UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2

In the matter of: **Lifestyle Footwear, Inc.** PR Road 125, km 3.8, Industrial Park, Pueblo Ward Moca, Puerto Rico, **Respondent.**	**Docket No. RCRA 02-2007-7115** **Proceeding under Section 3008 of the Solid Waste Disposal Act, as amended 42 U.S.C. § 6928**

ANSWER TO COMPLAINT, REQUEST FOR HEARING AND INFORMAL CONFERENCE WITH EPA TO PURSUE THE POSSIBILITY OF A SETTLEMENT

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ANSWER TO COMPLAINT, REQUEST FOR HEARING AND INFORMAL CONFERENCE WITH EPA TO PURSUE THE POSSIBILITY OF A SETTLEMENT

TO THE HONORABLE PRESIDING OFFICER:

COMES NOW, respondent Lifestyle Footwear, Inc. ("Lifestyle"), through the undersigned counsel, and very respectfully sets forth and prays:

1. The averments contained in paragraphs 1, 3, 5, 6, 9 and 10 of the complaint are admitted.

2. The averments contained in paragraph 2 of the complaint are admitted. However, respondent clarifies that Rocky Brands, Inc. does not own the manufacturing operation in China.

3. The averments contained in paragraph 4 of the complaint are admitted. However, respondent clarifies that it does not manufacture children's boots or hand-sewn casuals.

4. The averments contained in paragraph 7 of the complaint are admitted. However, respondent clarifies that it does not own a transportation fleet; rather the oil changes performed correspond exclusively to the sewing machinery.

5. The averments contained in paragraph 8 of the complaint are admitted in part and denied in part. Respondent admits to have the areas identified in subsections i, ii, iii, vi, vii, ix, x and xii in its facility. With regards to the areas identified in subsections iv, v, viii, xi, xiii, xiv

and xv such averments are denied for lack of sufficient information or belief to form an opinion as to the veracity of these allegations. In this context, respondent has been unable to identify the area by the name provided by the Environmental Protection Agency ("EPA").

6. The averments contained in paragraphs 11, 12, 13, 14, 15 and 16 of the complaint are admitted.

7. The averments contained in paragraphs 17, 18, 19, 20 and 21 of the complaint are admitted in part and denied in part. Respondent affirmatively avers that as long as it was a Conditionally Exempt Small Quantity Generator (CESQG), Lifestyle was not subject to accumulation, time and storage requirements of federal regulations, including, but not limited to, the requirements of 40 C.F.R. § 262.34.

8. The averments contained in paragraphs 22 through 26 of the complaint are denied for lack of sufficient information or belief to form an opinion as to the veracity of these allegations. Respondent affirmatively avers that as a CESQG, Lifestyle was not subject to accumulation, time and storage requirements of federal regulations, including, but not limited to, the requirements of 40 C.F.R. § 262.34.

9. The averments contained in paragraph 27 of the complaint are admitted.

10. The averments contained in paragraphs 28 and 29 of the complaint are denied. Respondent affirmatively avers that the EPA inspectors failed to hold a closing conference as required by applicable EPA procedural regulations.

11. The averments contained in paragraphs 30 through 34 of the complaint are admitted. However, Respondent clarifies that as a CESQG, Lifestyle was not subject to accumulation, time and storage requirements of federal regulations.

12. In connection to the averments contained in paragraph 35 of the complaint, respondent incorporates responses to pleadings corresponding to paragraphs 1 through 34.

13. The averments contained in paragraphs 36 through 38 of the complaint are admitted.

14. The averments contained in paragraph 39 of the complaint are admitted. However, respondent affirmatively avers that the waste material identified in subsections "a" through "c" did not constitute hazardous waste. *See*, **Exhibits I** through **IX** containing Material Safety Data Sheets ("MSDS") evidencing that paint and black sue ink used at the facility does not constitute hazardous waste.

15. The averments contained in paragraph 40 of the complaint are denied. Respondent affirmatively avers that the waste material identified in paragraph 39 of the complaint, subsections "a" through "c", were disposed by Safety Kleen even though such items did not constitute hazardous waste. *See*, **Exhibits X** through **XII** containing Purchase Order ("PO") amending the PO for March 24, 2006 and manifests for April 12 and 13, 2006. Note, however, that after the inspection, Lifestyle established an inventory control program in which the identification and the amounts of solid waste being handled at the facility are known at all times. *See*, Contingency Plan RCRA, USEPA, dated December 15, 2006, attached hereto as **Exhibit XIII.**

16. The averments contained in paragraphs 41 and 42 of the complaint are admitted in part and denied in part. Respondent affirmatively avers that not all the light bulbs identified in paragraph 41 were spent. In addition, with regards to the spent light bulbs, on July 14, 2006, Lifestyle purchased boxes to adequately label and dispose of these light bulbs. *See*, **Exhibits XIV** through **XVI** containing PO for boxes, picture of boxes adequately labeled as "Used

Fluorescent Bulbs" and PO/manifest for disposal thereof; *see also*, **Exhibit XIII**, for corrective measures taken thereafter.

17. The averments contained in paragraph 43 of the complaint are admitted in part and denied in part. Respondent affirmatively avers that not all the light bulbs identified in paragraph 41 were "discarded material" or "solid waste". In addition, none of the items identified in paragraph 39 constitutes hazardous waste. *See* **Exhibits I** through **IX;** *see also*, **Exhibit XIII**, for corrective measures taken by Lifestyle.

18. The averments contained in paragraph 44 of the complaint are admitted. However, respondent affirmatively avers that since the documents attached hereto as **Exhibits I** through **IX** clearly demonstrate that items identified in paragraph 39 do not constitute hazardous waste, no determination was needed. Notwithstanding, Respondent disposed of all these items as hazardous waste. *See*, **Exhibits XIV** through **XVI.** After the EPA inspection, respondent began labeling all its hazardous waste with a sign alerting of its presence. Each hazardous waste container is labeled with the words "Hazardous Wastes", a brief description of the waste contained therein and corresponding accumulation starting dates. *See*, **Exhibits XIII** and **XVII**.

19. The averments contained in paragraph 45 of the complaint are admitted in part and denied in part. To the extent that the documents attached hereto as **Exhibits I** through **IX** clearly demonstrate that the items identified in paragraph 39 of the complaint do not constitute hazardous waste, no such violation was committed. Regardless of said classification, respondents deposed of these items as hazardous waste. With regards to the items identified in paragraph 41, respondent affirmatively avers that on July 14, 2006, Lifestyle purchased boxes to adequately label and dispose of spent light bulbs. *See*, **Exhibits XIV** through **XVI**; and **Exhibit XIII**.

20. In connection to the averments contained in paragraph 46 of the complaint, respondent incorporates responses to pleadings corresponding to paragraphs 1 through 45.

21. The averments contained in paragraphs 47, 48 and 50 of the complaint are admitted. However, Respondent clarifies that as a CESQG, Lifestyle was not subject to accumulation, time and storage requirements of federal regulations. When Lifestyle became a Small Quantity Generator ("SQG"), Lifestyle was subject to limited waste management regulations, including, but not limited to 40 C.F.R. § 262.34.

22. The averments contained in paragraph 49 of the complaint are admitted in part and denied in part. Respondent admits to have stored hazardous waste in Hazardous Waste Area and the Backyard Area[1] but denies having stored hazardous waste in the Cutting Area.[2] No painting or chemical/raw material areas exist. Chemical and raw materials are treated in separate locations at the facility, neither of which was used to store hazardous waste. [3]

23. The averments contained in paragraph 51 of the complaint are denied for lack of sufficient information or belief to form an opinion as to the veracity of these allegations.

24. The averments contained in paragraph 52 of the complaint are admitted. However, Respondent clarifies that as a CESQG, Lifestyle was not subject to accumulation, time and storage requirements of federal regulations. When Lifestyle became a SQG, Lifestyle was subject to limited waste management regulations, including, but not limited to 40 C.F.R. § 262.34.

25. The averments contained in paragraphs 53 through 55 of the complaint are denied. Respondent affirmatively avers that to the extent that the containers allegedly

[1] For disposal of items located in Backyard Area, *see* **Exhibit XVIII** identifying them as residue, i.e. non EPA regulated material.
[2] *See* **Exhibit II.**

deteriorated and neglected were those identified in paragraph 75 of the complaint, these containers either did not contain hazardous waste or were never located in the Lifestyle facilities; thus, does not constitute proof of the amount of time in which Lifestyle stored hazardous waste. Regardless of the aforementioned, any waste stored by Lifestyle at the time of the inspection (March 20, 2006) was discarded by Safety Kleen between April and June 2006, i.e. within 180 days.

26. The averments contained in paragraphs 56 and 58 of the complaint are admitted. However, Respondent clarifies that as a CESQG, Lifestyle was not subject to accumulation, time and storage requirements of federal regulations. When Lifestyle became a SQG, Lifestyle was subject to limited waste management regulations, including, but not limited to 40 C.F.R. § 262.34.

27. The averments contained in paragraphs 57 and 59 of the complaint are admitted in part and denied in part. Items identified in subsections a,[4] b,[5] c[6], g,[7] h,[8] i,[9] and l[10] did not contain hazardous waste; thus are denied. As per items identified in subsections d and f, *see* **Exhibits XXII** and **XVIII**, providing corresponding manifest and evidencing that Safety Kleen identified 60 out of 69 five-gallon pails as residue, i.e. non EPA regulated material, respectively. Items identified in subsections e, j and k, are denied in its entirety, since respondent does not hold these

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[3] For disposal of raw material, see **Exhibit XIX.**

[4] *See*, **Exhibits I** through **IX** containing MSDS evidencing that paint used at the facility does not constitute hazardous waste. Notwithstanding, pursuant to **Exhibit X**, respondent disposed of said items as hazardous waste.

[5] *See*, **Exhibit III** containing MSDS evidencing that spent solvent waste does not constitute hazardous waste. Notwithstanding, pursuant to **Exhibit XII**, respondent disposed of said items as hazardous waste.

[6] Lifestyle does not use silicone in its facility, instead it uses wax, which does not constitute hazardous waste, see **Exhibit XX.**

[7] Latex glue does not constitute hazardous waste, *see* **Exhibit XXI.**

[8] Ink material does not constitute hazardous waste, *see* **Exhibit I.**

[9] The waste material identified in subsection "i" was disposed by Safety Kleen as hazardous waste, even though it did not constitute hazardous waste. *See*, **Exhibits X** through **XII.**

[10] *See*, **Exhibits IV** through **Exhibits IX** containing MSDS certifying that Desmas do not generate hazardous waste.

hazardous waste with a sign alerting of its presence. Each hazardous waste container is labeled with the words "Hazardous Wastes", a brief description of the waste contained therein and corresponding accumulation starting dates. See, **Exhibit XIII** and **XVII**.

28. The averments contained in paragraphs 60 and 61 of the complaint are admitted. However, Respondent clarifies that as a CESQG, Lifestyle was not subject to accumulation, time and storage requirements of federal regulations. When Lifestyle became a SQG, Lifestyle was subject to limited waste management regulations, including, but not limited to 40 C.F.R. § 262.34.

29. The averments contained in paragraph 62 of the complaint are admitted in part and denied in part. Respondent does not recognize the Chemical/Raw Material Warehouse Area. Chemical and raw materials are treated in separate locations at the facility, neither of which was used to store hazardous waste. [11] Respondent affirmatively avers that since the March 20 visit, Lifestyle has developed a Maintenance Program which includes scheduled and preventive maintenance ("PM"). See, **Exhibit XIII.** As part of the preventive maintenance program, Lifestyle's trained personnel identify the equipment or systems to which the PM program must apply; periodically inspect or test the equipment and systems identified as "Hazardous Waste"; conduct appropriate adjustment, repair, or replacement of parts and/or equipment, when needed; and maintain complete PM records on the applicable equipment and systems. In this context, Lifestyle is performing at least a weekly inspection of the Hazardous Waste Container Accumulation Area. See inspection logs attached hereto as **Exhibit XXIII.**

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[10] *See*, **Exhibits IV** through **Exhibits IX** containing MSDS certifying that Desmas do not generate hazardous waste.
[11] For disposal of raw material, *see* **Exhibit XIX**

30. The averments contained in paragraphs 63, 64 and 65 of the complaint are denied as drafted. The clarifications made in paragraphs 14 and 27 above with regards to the storage of non-hazardous waste, identified by the EPA as hazardous waste, are incorporated herein by reference. In addition, respondent clarifies that as a CESQG, Lifestyle was not subject to accumulation, time and storage requirements of federal regulations. When Lifestyle became a SQG, Lifestyle was subject to limited waste management regulations, including, but not limited to 40 C.F.R. § 262.34.

31. In connection to the averments contained in paragraph 66 of the complaint, respondent incorporates responses to pleadings corresponding to paragraphs 1 through 65.

32. The averments contained in paragraphs 67 and 68 of the complaint are admitted. However, respondent clarifies that as a CESQG, Lifestyle was not subject to accumulation, time and storage requirements of federal regulations. When Lifestyle became a SQG, Lifestyle was subject to limited waste management regulations, including, but not limited to 40 C.F.R. § 262.34.

33. The averments contained in paragraph 69, 70 and 71 are denied. The clarifications made in paragraphs 14 and 27 above with regards to the storage of non-hazardous waste, identified by the EPA as hazardous waste, are incorporated herein by reference. As per the items identified in subsection "a" through "e", please refer to the following Exhibits which demonstrate that corresponding container did not store hazardous waste:

(a) **Exhibit II**;

(b) **Exhibits I** through **X**;

(c) **Exhibit XXI;**

(d) **Exhibit I;** and,

(e) **Exhibits X** through **XII**.

In addition, Lifestyle affirmatively avers that each container opening is maintained in a closed, sealed position (i.e., covered with a gasket lid) at all times that the waste is in the container except when it is necessary to have the opening open during procedures to add, remove, inspect, or sample the waste in the container. Containers-transferring operations at the accumulation area are avoided, whenever possible. Preference is given to provide a DOT-approved overpack (rather than repackaging to a new container) when an organic waste container is rusted or damaged. If transferring becomes necessary, it is done in such a manner as to minimize waste exposure and volatilization to the atmosphere to the extent practical, considering good engineering and safety practices for handling hazardous materials. *See*, **Exhibit XIII.**

34. In connection to the averments contained in paragraph 72 of the complaint, respondent incorporates responses to pleadings corresponding to paragraphs 1 through 71.

35. The averments contained in paragraphs 73, 74, 78, 79 and 80 of the complaint are admitted. However, respondent clarifies that as a CESQG, Lifestyle was not subject to accumulation, time and storage requirements of federal regulations. When Lifestyle became a SQG, Lifestyle was subject to these limited waste management regulations.

36. In connection to the averments contained in paragraph 77 of the complaint, respondent incorporates responses to pleadings corresponding to paragraphs 1 through 76.

37. The averments contained in paragraphs 75 and 81 of the complaint are denied. The clarifications made in paragraphs 14 and 27 above with regards to the storage of non-hazardous waste, identified by the EPA as hazardous waste, are incorporated herein by reference. Respondent does not hold containers identified in subsection "a" of paragraphs 75 and 81 or containers identified in subsection "d" paragraphs 75. With regards to items identified in

subsection "b" of paragraphs 75 and 81, **Exhibits XXII** and **XVIII**, providing corresponding manifest, evidence that Safety Kleen identified 60 out of 69 five-gallon pails as residue, i.e. non EPA regulated material. According to **Exhibits X** through **XII**, the material identified in subsection "c" of paragraphs 75 and 81 was disposed by Safety Kleen as hazardous waste even though it did not constitute hazardous waste.

Lifestyle affirmatively avers that since the inspection, the containers are maintained within the diked area with gates shut. Also, there is a Containers Management Program at Lifestyle for adequate management of the containers, avoiding or minimizing the possibility of releases. If a release actually happens, it will be contained within the respective area by the existing secondary containment system. A container management system has been implemented and containers accumulating organic-type hazardous wastes are subject to special container management practices regarding prevention and control of volatile air emissions. See, **Exhibit XIII.**

38. The averments contained in paragraphs 76, 82 and 83 of the complaint are denied. The clarifications and affirmative defenses contained in paragraphs 37 above are incorporated herein by reference. In addition, respondent affirmatively avers that a roof is provided at all storage areas to protect the containers against moisture and sunlight. See, **Exhibits XVII** and **XXIV**. The Lifestyle Fire Prevention and Protection Program is also oriented toward the HWAA mentioned in Section 2.0. This area is within the ones posing the largest fire hazards at the site. The HWAA description in Section 2.0 includes proper handling and storage procedures instituted at Lifestyle, which also will help to avoid or minimize the occurrence of fires. Control procedures regarding fire control at the HWAAs include the prohibition of welding, smoking, and other potential ignition sources that can create a fire within each area. *See*, **Exhibit XIII.**

39. In connection to the averments contained in paragraph 84 of the complaint, respondent incorporates responses to pleadings corresponding to paragraphs 1 through 83.

40. The averments contained in paragraphs 85 through 90 of the complaint are admitted. However, respondent affirmatively avers that it has developed three (3) training levels, based upon the particular skills, capabilities, and involvement of the respective employees. These levels are: (1) General Awareness Training; (2) Hazardous Wastes Handling Training; (3) Emergency Response Team Training. *See*, **Exhibit XIII** and **Exhibit XXV**, identifying personnel who have already taken the initial training and yearly review.

41. In connection to the averments contained in paragraph 91 of the complaint, respondent incorporates responses to pleadings corresponding to paragraphs 1 through 90.

42. The averments contained in paragraphs 92 through 94 of the complaint are admitted. However, Lifestyle affirmatively avers it corrected this violation by adequately labeling the container with the words "Used Oil". *See*, **Exhibit XXVI**

AFFIRMATIVE DEFENSES

1. The complaint is time barred.

2. Penalty is excessive and do not hold proportion to the violations incurred by respondent.

3. Waiver.

4. Consent.

5. All affirmative allegations contained in the responses to specific allegations of the complaint are hereby incorporated and made part of this affirmative defense.

6. Lifestyle reserves the right to amend this answer to complaint to include additional affirmative defenses unknown at this moment that may arise from discovery.

WHEREFORE, Lifestyle respectfully requests this Honorable Presiding Officer a hearing in order to contest the allegations denied in whole of in part in the instant answer and contest the penalty proposed by the complaint. However, respondent respectfully requests that prior to initiating the proceedings for the formal hearing, the Honorable Presiding Officer allow the parties to participate in an informal conference to discuss issues relating to the alleged violations and the amount of the proposed penalty.

RESPECTFULLY SUBMITTED.

In San Juan, this 26 day of October, 2007.

I HEREBY CERTIFY: that the foregoing motion was sent on this date by Federal Express to the **Regional Hearing Clerk**, U.S. Environmental Protection Agency, Region 2, 290 Broadway, 16th floor, New York, New York 10007-1866; **Stuart Keith**, Assistant Regional Counsel, Office of Regional Counsel, U.S. Environmental Protection Agency, Region 2, 290 Broadway, 16th floor, New York, New York 10007-1866 and by regular mail certified receipt request to **Julio I. Rodriguez**, Director, Land Pollution Regulation Program, Puerto Rico Environmental Quality Board, P.O. Box 11488, Santurce, PR 00910.

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EXHIBIT I

ODUCTS, INC.

Central Street
igor, Maine 04401
A

L 207 942-6348
X 207 942-9662

MATERIAL SAFTEY DATA SHEET

BLACK REPIPLAST 99288

12 DISPOSAL CONSIDERATIONS

12.1 Dispose of in accordance with local regulation.

12.2 Contaminated containers must be handled in the same way as the product. Uncontaminated containers can be recycled or used for internal waste.

13 TRANSPORT INFORMATION

Non-hazardous product, not subject to special labeling.

13.1 RID/ADR:

13.2 IMDG-Code:

14.3 IATA

14.4 Flash point > 170 DegC

14 REGULATORY INFORMATION

This product is not classified as a hazardous substance or composition according to Italian DPR 256 and its subsequent modifications and according to EEC regulation 67/548.

14.1 EEC CLASSIFICATION

14.2 R-PHRASES (R)

14.3 SAFETY PHRASES (S)

15 OTHER INFORMATION

15.1 ADDITIONAL DATA

15.2 RECOMMENDED ADDITION RATE 3 %

15.3 STIR WELL BEFORE USE

This product should be stored, handled and used in accordance with good industrial hygiene practices and in conformity with current legal regulations. The information contained herein is based on the present state of our knowledge and is intended to describe our products from the point of view of safety requirements. It should not therefore be construed as guaranteeing specific properties.

N.A. = NOT APPLICABLE N.D. = NOT DETERMINED

COMPLETED ON 9/3/2003

ODUCTS, INC.
Central Street
igor, Maine 04401
A
207 942-6348
X 207 942-9662

MATERIAL SAFTEY DATA SHEET

BLACK REPIPLAST 99288

6 HANDLING AND STORAGE

6.1 HANDLING: Ensure good ventilation and adequate air exchange in the warehouse. Do not eat, drink, or smoke in the working area.

6.2 STORAGE: Keep away food and drinks. Material to be kept close in original containers at environmental temperature. Storage life: 6 months within sealed container.

7 EXPOSURE CONTROL / PERSONAL PROTECTION

7.1 PROTECTIVE MEASURES: No particular measure required.
7.2 EXPOSURE CONTROLS: Not indicated.
7.3 RESPIRATORY PROTECTION: Use mask with suitable filter.
7.4 HAND PROTECTION: Use protective gloves.
7.5 EYE PROTECTION: Use mask or other face protection.
7.6 SKIN PROTECTION: Use suitable footwear -being well closed

8 ECOLOGICAL INFORMATION

Contains partially biodegradable products. The product must not be disposed of in the soil or in stagnant, running or sewage water.

PHYSICAL AND CHEMICAL DATA

.1	Appearance	Paste	
9.2	Color	Black	
9.3	Odor	-	
9.4	Density gr/cc at 20 DegC ca.	1.10	
9.5	*Viscosity cps at 20 DegC	4000	Measured with BROOKFIELD RVF
9.6	pH at 20 DegC	N.D.	(Spindle n.6, 20 rpm)
9.7	Boiling point	> 190 DgC	
9.8	Melting point	N.A.	
9.9	Flash point	> 170 DgC	
9.10	Apparent Density gr/cc	N.A.	
9.11	Vapor pressure mbar at 20 DegC	N.A.	
9.12	Solubility in water at 20 DgC	INSOLUBLE	

10 STABILITY AND REACTIVITY

10.1 THERMAL DECOMPOSITION: 170 DegC
10.2 CONDITIONS TO BE AVOIDED: No particular conditions.
10.3 MATERIALS TO BE AVOID: Keep away from oxidizing substances, amines and acids.
10.4 HAZARDOUS DECOMPOSITION PRODUCTS: None if the product is utilized in accordance with the correct procedures of use.

11 TOXICOLOGICAL INFORMATION

11.1	Acute oral toxicity LD-50	> 10000 mg/kg (tested on rats)
2	Skin sensitisation tested on guinea pigs	N.D.
.3	Eye irritation	N.D.
11.4	Respiratory tract irritation	N.D.
11.5	Skin irritation	N.D.

P.A.T.
PRODUCTS, INC.

44 Central Street
Bangor, Maine 04401
USA

TEL 207 942-6348
FAX 207 942-9662

MATERIAL SAFTEY DATA SHEET

REPI S.p.A. (Manufacturer)
Via della Vecchia Stazione 104/106 - Gorla Maggiore (VA) ITALY

P.A.T. PRODUCTS, INC., AS DISTRIBUTOR
44 Central Street, Bangor, ME - USA

EMERGENCY TELEPHONE NUMBER 011 39 331 614001

TECHNICAL AND SAFETY DATA SHEET

Commercial Name BLACK REPIPLAST 99288 -

1.1 CHEMICAL COMPOSITION: Dispersion of pigments in plasticizer and additives.

1.2 HAZARDOUS INGREDIENTS: This product is not classified as a hazardous substance or composition according to Italian DPR 256 and its subsequent modifications and according to ECC regulation 67/548.

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2. HAZARD IDENTIFICATION: Not a dangerous product to EEC criteria.

3. FIRST AID MEASURES

3.1 SKIN CONTACT: Wash with soap and water. Do not use solvents or diluents.

3.2 EYE CONTACT: Rinse immediately with plenty of water for at least 15 minutes. In case of persistent irritation, seek medical attention.

3.3 INHALATION: Take the affected person into the open air. In case of feeling of illness or of prolonged exposure, seek medical attention.

3.4 INGESTION: Do not induce vomiting, keep the patient at rest and seek medical attention.

4. MEASURES FOR FIRE PREVENTION

4.1 SUITABLE EXTINGUISHING MEDIA: CO2; Dry powder; Water; Foam.

4.2 EXTINGUISHING MEDIA NOT TO BE USED: Water at high pressure.

4.3 EXPOSURE RISKS: None

4.4 PROTECTIVE EQUIPMENT IN CASE OF FIRE OPERATIONS: Use protective garment and masks.

5 MEASURES IN CASE OF ACCIDENTAL SPILLAGE

5.1 PERSONAL PRECAUTIONS: Avoid contact with skin, eyes and garment. Do not breathe vapor. Keep away from heat sources.

5.2 ENVIRONMENTAL PRECAUTIONS: Keep our of drains and sewers.

5.3 METHODS FOR CLEANING UP: Collect spilled material into appropriate sealed container and arrange for disposal.

EXHIBIT
I

MATERIAL SAFETY DATA SHEET

Prime Leather Finishes/Prime Coatings
1002 Hickory Street
Pewaukee, WI 53072

Date prepared: April 14, 2006
Prepared by: Lori Schneider
Information: 262-691-1930

24 hour emergency phone number: 1-800-688-4005

Section 1 – Chemical Product Identification

Product Number: 02-0241
Product Name: Black Dressing

Section 2 – Hazardous Ingredients

None

Section 3 – Hazards Identification

Emergency overview: None
Routes of entry: None
Effects and Symptoms of Overexposure: None expected in normal use.

Section 4 – First Aid Measures

Eyes: Immediately flush eyes with water.
Skin: Wash with soap and water if irritation develops.

Section 5 – Fire Fighting Measures

Non-flammable.

Section 6 -- Accidental Release Measures

Spill or Leak Procedures: Wipe up with absorbent material. Put in container for disposal. Not considered hazardous waste.

Section 7 – Handling and Storage

Storage precautions: Storing between 40° F and 95° F recommended.
Shelf life: 12 months; may be as long as 24 months if unopened and properly stored.

Incompatibilities: Protect from freezing.

Section 8 – Personal Protection

Eye Protection: Safety glasses should be worn in any industrial environment.
Skin Protection: Water resistant gloves recommended to prevent drying of skin.
Ventilation Requirements: None required unless material is sprayed, then the removal of airborne particles is recommended.
Other Protective Measures: Eye wash stations should be easily accessible to the work area.

Section 9 – Physical and Chemical Properties

Appearance: Liquid
pH: 7-10
Solubility: Miscible.
Specific gravity: 1.01
Non-volatile %: 21

Section 10 – Stability and Reactivity

Stability: Stable
Hazardous polymerization: Will not occur
Incompatibilities: None
Decomposition products: If burned: oxides of carbon

This information is supplied with no warranty, express or implied, except that it is accurate to the best of Prime Leather Finishes/Prime Coating's knowledge. Prime Leather Finishes/Prime Coatings assumes no legal responsibility for reliance on this information.

END OF MSDS

EXHIBIT
III

HUNTSMAN

Material Safety Data Sheet

Section 1. Chemical Product and Company Identification

Product name **DALTOPED® LS 34777** MSDS #00031853

Huntsman Polyurethanes (an international business unit of Huntsman International LLC.)

10003 Woodloch Forest Drive
The Woodlands, TX 77380

For Polyurethanes product information/assistance:
The Woodlands: (800) 257-5547
Auburn Hills: (800) 553-8624
Canada: (905) 678-9150

In Case of Emergency

Spills Leaks Fire or Exposure Call Chemtrec: (800) 424-9300
Medical Emergency Information: (800) 328-8501

Section 2. Composition, information on ingredients

Name	CAS #	% by Weight
Polyester polyol	85214-48-8	60 - 100

*** Occupational Exposure Limit(s), if available, are listed in section 8**

Section 3. Hazards Identification

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

Physical state and Appearance Liquid. (Viscous liquid.)

Potential Acute Health Effects

Eyes Hazardous in case of eye contact (irritant).

Skin Hazardous in case of skin contact (irritant).

Inhalation Hazardous in case of inhalation (lung irritant).

Ingestion Slightly hazardous in case of ingestion.

GENERAL INFORMATION Read the entire MSDS for a more thorough evaluation of the hazards.

Section 4. First Aid Measures

Eye contact Check for and remove any contact lenses. In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Get medical attention if irritation occurs.

Skin Contact Wash with soap and water. Get medical attention if symptoms occur.

Inhalation If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention.

Ingestion Do not induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. If potentially dangerous quantities of this material have been swallowed, call a physician immediately. Loosen tight clothing such as a collar, tie, belt or waistband.

Notes to physician Symptomatic and supportive therapy as needed. Following severe exposure medical follow-up should be monitored for at least 48 hours.

Section 5. Fire Fighting Measures

Auto-ignition temperature Not available.

Flash points Closed cup: >110°C (230°F). (Cleveland.)

Flammable Limits Not available.

Products of Combustion Thermal decomposition products are toxic and may include hydrocarbons, oxides of carbon and other irritating gases.

Fire-fighting media and instructions SMALL FIRE: Use dry chemical powder.
LARGE FIRE: Use water spray, fog or foam. Do not use water jet.

Protective Clothing (Fire) Splash goggles. Full suit. Boots. Gloves. Self-contained breathing apparatus (SCBA) should be used to avoid inhalation of the product.

Section 6. Accidental Release Measures

For major spills call Chemtrec (800-424-9300).

SEE MATERIAL SAFETY DATA SHEET Section 8. Exposure controls, personal protection

Small Spill and Leak Absorb with an inert material and transfer the spilled material and absorbent to an appropriate waste disposal container.

Large Spill and Leak Absorb with an inert material and transfer the spilled material and absorbent to an appropriate waste disposal container.

Section 7. Handling and Storage

Handling Avoid breathing vapors, spray or mists. Avoid contact with eyes, skin and clothing.

Storage Keep container tightly closed. Keep container in a cool, well-ventilated area.

Section 8. Exposure controls, personal protection

Preventive Measures Conditions of use, adequacy of engineering or other control measures, and actual exposures will dictate the need for specific protective devices at your workplace.

Engineering Controls Use local exhaust ventilation to maintain airborne concentrations below the TLV. Suitable respiratory equipment should be used in cases of insufficient ventilation or where operational procedures demand it. For guidance on engineering control measures refer to publications such as the ACGIH current edition of 'Industrial Ventilation, a manual of Recommended Practice.'

Personal Protection

Eyes Chemical safety goggles. If there is a potential for splashing, use a full face shield.

Body and Hands Lab coat.

Respiratory Wear appropriate respirator when ventilation is inadequate.

Consult your supervisor or S.O.P. for special handling instructions.

Personal Protection in Case of a Large Spill	Splash goggles. Full suit. Boots. Gloves. Suggested protective clothing might not be adequate. Consult a specialist before handling this product.

Product Name	**Exposure Limits**

No occupational exposure limits have been assigned.

Section 9. Physical and Chemical Properties

Physical state and Appearance	Liquid. (Viscous liquid.)
pH	Not available.
Boiling/Condensation Point	Not available.
Melting/Freezing Point	Not available.
Evaporation Rate	Not available.
Flash points	Closed cup: >110°C (230°F). (Cleveland.)

Section 10. Stability and Reactivity

Stability and reactivity	The product is stable.
Conditions of Instability	Not available.
Incompatibility with Various Substances	Strong oxidizing materials
Hazardous Decomposition Products	Thermal decomposition products are toxic and may include hydrocarbons, oxides of carbon and other irritating gases.
Hazardous Polymerization	Will not occur.

Section 11. Toxicological Information

Toxicity Data

Ingredient Name	**Test**	**Result**	**Route**	**Species**

No data available.

Inhalation	Hazardous in case of inhalation (lung irritant).
Skin Contact	Hazardous in case of skin contact (irritant).
Eye contact	Hazardous in case of eye contact (irritant).
Ingestion	Slightly hazardous in case of ingestion.
Carcinogenic remarks	**The ingredients of this product are not classified as carcinogenic by ACGIH or IARC, not regulated as carcinogens by OSHA, and not listed as carcinogens by NTP.**
Mutagenic Effects	None known.
Reproductive Effects	None known.
Teratogenic effects	None known.

Section 12. Ecological Information

Ecotoxicity	Not available.

Section 13. Disposal Considerations

Waste Information	Non-hazardous waste.The generation of waste should be avoided or minimized wherever possible. Dispose of waste material at an approved waste treatment/disposal facility in accordance with applicable local, provincial and federal regulations. Do not dispose of waste with normal garbage, or to sewer systems. Empty containers should be decontaminated and either passed to an approved drum recycler or destroyed.

Section 14. Transport Information

Transportation Emergency Number 1-800-424-9300 (CHEMTREC).

DOT Classification	Not regulated.
TDG Classification	Not regulated.
IMO/IMDG Classification	Not regulated.
ICAO/IATA Classification	Not regulated.

Section 15. Regulatory Information

U.S. Federal Regulations

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

HCS Classification Irritating material

TSCA 8(b) inventory:All Ingredients Listed.

SARA Title III Section 313 (40 CFR Part 372):

No ingredients listed.

This product does not contain nor is it manufactured with ozone depleting substances.

State Regulations

California Prop. 65: No ingredients listed.

Canadian Regulations

This product has been classified in accordance with the hazard criteria of the CPR (Controlled Products Regulations) and this MSDS (Material Safety Data Sheet) contains all the information required by the CPR.

WHMIS (Canada) Class D-2B: Material causing other toxic effects (Toxic).

CEPA DSL/NDSL:All Ingredients Listed.

Section 16. Other Information

Hazardous Material Information System (U.S.A.)

Health	1
Fire Hazard	1
Reactivity	0

National Fire Protection Association (U.S.A.)

Trademarks: DALTOPED® is a registered trademark of Huntsman LLC or an affiliate thereof in one or more countries, but not all countries.

Notice to Reader

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IN ALL CASES, IT IS THE RESPONSIBILITY OF THE USER TO DETERMINE THE APPLICABILITY OF SUCH INFORMATION AND RECOMMENDATIONS AND THE SUITABILITY OF ANY PRODUCT FOR ITS OWN PARTICULAR PURPOSE.

THE PRODUCT MAY PRESENT HAZARDS AND SHOULD BE USED WITH CAUTION. WHILE CERTAIN HAZARDS ARE DESCRIBED IN THIS PUBLICATION, NO GUARANTEE IS MADE THAT THESE ARE THE ONLY HAZARDS THAT EXIST.

Hazards, toxicity, and behavior of the products may differ when used with other materials and are dependent upon the manufacturing circumstances or other processes. Such hazards, toxicity and behavior should be determined by the user and made known to handlers, processors and end users.

Verified by newhodm.
Printed 9/28/2005.

EXHIBIT
IV

HUNTSMAN
Polyurethanes

Material Safety Data Sheet

Validated by newhodm on 5/21/2003.

Section 1. Chemical Product and Company Identification

Product name DALTOPED® HP 44682 **MSDS#7910**

Huntsman Polyurethanes (an international business unit of Huntsman International LLC.)

286 Mantua Grove Rd.
West Deptford, NJ 08066-1723

For Polyurethanes product information/assistance:
West Deptford: (800)257-5547
Auburn Hills: (800)553-8624
Canadian Office: (905)678-9150

In Case of Emergency

Spills Leaks Fire or Exposure Call Chemtrec: (800) 424-9300
Medical Emergency Information: (800) 328-8501

Section 2. Composition, Information on Ingredients

Name	CAS #	% by Weight
Polyester polyol	Not Disclosed	60-100
1,4 butanediol	110-63-4	7-13

* Occupational Exposure Limit(s), if available, are listed in section 8

Section 3. Hazards Identification

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

Physical State and Appearance Liquid.

Color Amber.

Emergency Overview Avoid contact with eyes. Wash thoroughly after handling.

Potential Acute Health Effects

Eyes Hazardous in case of eye contact (irritant).

Skin Slightly hazardous in case of skin contact (irritant).

Inhalation Slightly hazardous in caseof inhalation. (respiratory tract irritation)

Ingestion Slightly hazardous in case of ingestion.

GENERAL INFORMATION Read the entire MSDS for a more thorough evaluation of the hazards.

Section 4. First Aid Measures

Eye Contact Check for and remove any contact lenses. In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Cold water may be used. Get medical attention.

Skin Contact Wash with soap and water. Cold water may be used.Get medical attention if symptoms occur.

Inhalation If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention if symptoms appear.

Ingestion Do NOT induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. Loosen tight clothing such as a collar, tie, belt or waistband. Get medical attention if symptoms appear.

Notes to Physician Symptomatic and supportive therapy as needed. Following severe exposure medical follow-up should be monitored for at least 48 hours.

Section 5. Fire Fighting Measures

Autoignition Temperature Not available.

Flash Points CLOSED CUP: >110°C (230°F).

Flammable Limits Not available.

Products of Combustion Thermal decomposition products are toxic and may include hydrocarbons, oxides of carbon and other irritating gases.

Fire Hazards in Presence of Various Substances Slightly flammable to flammable in presence of open flames, sparks and static discharge.

Fire Fighting Media and Instructions SMALL FIRE: Use DRY chemical powder.
LARGE FIRE: Use water spray, fog or foam. Do not use water jet.

Protective Clothing (Fire) Splash goggles. Full suit. Boots. Gloves. A self-contained breathing apparatus should be used to avoid inhalation of the product.

Section 6. Accidental Release Measures

For major spills call Chemtrec (800-424-9300).

See Safety Data Sheet section 8 Personal protective equipment

Small Spill and Leak Dilute with water and mop up, or absorb with an inert dry material and place in an appropriate waste disposal container. Finish cleaning by spreading water on the contaminated surface and dispose of according to local and regional authority requirements.

Large Spill and Leak Absorb with an inert material and put the spilled material in an appropriate waste disposal container. Finish cleaning by spreading water on the contaminated surface and allow to evacuate through the sanitary system. Be careful that the product is not present at a concentration level above TLV. Check TLV on the MSDS and with local authorities.

Section 7. Handling and Storage

Handling Avoid contact with eyes, skin and clothing. Wash thoroughly after handling.

Storage Keep container tightly closed. Keep container in a cool, well-ventilated area. Do not store above 40°C (104°F).

Section 8. Exposure Controls, Personal Protection

Preventive Measures Conditions of use, adequacy of engineering or other control measures, and actual exposures will dictate the need for specific protective devices at your workplace.

Engineering Controls Use local exhaust ventilation to maintain airborne concentrations below the TLV. Suitable respiratory equipment should be used in cases of insufficient ventilation or where operational procedures demand it. For guidance on engineering control measures refer to publications such as the ACGIH current edition of 'Industrial Ventilation, a manual of Recommended Practice.'

Personal Protection

Eyes Chemical safety goggles. If there is a potential for splashing, use a full face shield.

Body and Hands Lab coat.
Gloves.

Respiratory Wear appropriate respirator when ventilation is inadequate.

Personal Protection in Case of a Large Spill Splash goggles. Full suit. Vapor respirator or a self-contained breathing apparatus. Boots. Gloves. Suggested protective clothing might not be sufficient; consult a specialist BEFORE handling this product.

Product Name	Exposure Limits
No occupational exposure limits have been assigned.	

Section 9. Physical and Chemical Properties

Physical State and Appearance Liquid. (Liquid.)

Odor Slight amine.

Color Amber.

pH Not available.

Boiling/Condensation Point Not available.

Melting/Freezing Point	Not available.
Specific Gravity	1.17 (Water = 1)
Evaporation Rate	Not available.
Viscosity	1292 cP
Flash Points	CLOSED CUP: >110°C (230°F).

Section 10. Stability and Reactivity

Stability and Reactivity	The product is stable.
Conditions of Instability	Not available.
Incompatibility with Various Substances	Slightly reactive to reactive with oxidizing agents, reducing agents.
Hazardous Decomposition Products	Thermal decomposition products are toxic and may include hydrocarbons, oxides of carbon and other irritating gases.
Hazardous Polymerization	Will not occur.

Section 11. Toxicological Information

Toxicity Data

Ingredient Name	Test	Result	Route	Species
1,4 butanediol	LD50	1780 mg/kg	Oral	Rat
	LD50	2180 mg/kg	Oral	Mouse
	LD50	>2000 mg/kg	Dermal	Rabbit
	LC50	5.1 to 15 mg/l (4 hours)	INHALATION	Rat

Inhalation	Slightly hazardous in case of inhalation.(respiratory tract irritation)
Skin Contact	Slightly hazardous in case of skin contact (irritant).
Eye Contact	Hazardous in case of eye contact (irritant).
Ingestion	Slightly hazardous in case of ingestion.
Remarks	Repeated exposure may produce adverse effects on the central nervous system, liver and kidneys. [1,4-BUTANEDIOL]
Carcinogenic remarks	**The ingredients of this product are not classified as carcinogenic by ACGIH or IARC, not regulated as carcinogens by OSHA, and not listed as carcinogens by NTP.**
Mutagenic Effects	None known.
Reproductive Effects	None known.
Teratogenic effects	None known.

Section 12. Ecological Information

Ecotoxicity Not available.

Section 13. Disposal Considerations

Waste Information Non-hazardous waste.The generation of waste should be avoided or minimized wherever possible. Dispose of waste material at an approved waste treatment/disposal facility in accordance with applicable local, provincial and federal regulations. Do not dispose of waste with normal garbage, or to sewer systems. Empty containers should be decontaminated and either passed to an approved drum recycler or destroyed.

Section 14. Transport Information

Transportation Emergency Number 1-800-424-9300 (CHEMTREC).

DOT Classification Not regulated.

TDG Classification Not regulated.

IMO/IMDG Classification Not regulated.

ICAO/IATA Classification Not regulated.

Section 15. Regulatory Information

U.S. Federal Regulations

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

HCS Classification HCS Class: Target organ effects.

TSCA 8(b) inventory:All Ingredients Listed.

EPCRA Section 313 (40 CFR 372)
No ingredients listed.

This product does not contain nor is it manufactured with ozone depleting substances.

State Regulations California prop. 65: No ingredients listed.

Canadian Regulations

This product has been classified in accordance with the hazard criteria of the CPR (Controlled Products Regulations) and this MSDS (Material Safety Data Sheet) contains all the information required by the CPR.

WHMIS (Canada) Class D-2B: Material causing other toxic effects (TOXIC).

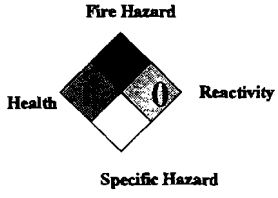
CEPA DSL/NDSL:All Ingredients Listed.

Section 16. Other Information

Hazardous Material Information System (U.S.A.)

Health	1
Fire Hazard	0
Reactivity	0

National Fire Protection Association (U.S.A.)



Trademarks: DALTOPED® is a registered trademark of Huntsman International LLC in one or more countries, but not all countries.

Notice to Reader

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THE PRODUCT MAY PRESENT HAZARDS AND SHOULD BE USED WITH CAUTION. WHILE CERTAIN HAZARDS ARE DESCRIBED IN THIS PUBLICATION, NO GUARANTEE IS MADE THAT THESE ARE THE ONLY HAZARDS THAT EXIST.

Hazards, toxicity, and behavior of the products may differ when used with other materials and are dependent upon the manufacturing circumstances or other processes. Such hazards, toxicity and behavior should be determined by the user and made known to handlers, processors and end users.

Verified by newhodm.

Printed 5/22/2003.

EXHIBIT
V

HUNTSMAN

Date: 2/10/2006.

Material Safety Data Sheet

Section 1. Chemical Product and Company Identification

Product name **DALTOPED® LF 56734** MSDS #00022247

Huntsman Polyurethanes (an international business unit of Huntsman International LLC.)

10003 Woodloch Forest Drive
The Woodlands, TX 77380
For Polyurethanes product information/assistance:
The Woodlands: (800) 257-5547
Auburn Hills: (800) 553-8624
Canada: (905) 678-9150

In Case of Emergency

Spills Leaks Fire or Exposure Call Chemtrec: (800) 424-9300
Medical Emergency Information: (800) 328-8501

Section 2. Composition, information on ingredients

Name	CAS #	% by Weight
Polyether polyol blend	Not Disclosed	60-100
1,4 butanediol	110-63-4	7-13
Ethylene glycol	107-21-1	1-3
N-Tridecloxyypropylaminopropylamine	68479-04-9	1-3

*** Occupational Exposure Limit(s), if available, are listed in section 8**

Section 3. Hazards Identification

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

Physical state and Appearance Liquid.

CAUSES EYE AND SKIN BURNS.
MAY BE HARMFUL IF INHALED OR SWALLOWED.
MAY CAUSE ALLERGIC SKIN REACTION.
CONTAINS MATERIAL WHICH MAY CAUSE BIRTH DEFECTS, BASED ON ANIMAL DATA..

Potential Acute Health Effects

Eyes Hazardous in case of eye contact (corrosive).

Skin Hazardous in case of skin contact (corrosive, sensitizer). Skin contact may produce burns.

Inhalation Hazardous in case of inhalation. Inhalation of the spray mist may produce severe irritation of respiratory tract, characterized by coughing, choking, or shortness of breath.

Ingestion May cause burns to mouth, throat and stomach.

GENERAL INFORMATION Read the entire MSDS for a more thorough evaluation of the hazards.

Section 4. First Aid Measures

Eye contact Check for and remove any contact lenses. In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Cold water may be used. Get medical attention immediately.

Skin Contact In case of contact, immediately flush skin with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Cold water may be used.Wash clothing before reuse. Get medical attention immediately.

Inhalation If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention.

Ingestion Do not induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. If potentially dangerous quantities of this material have been swallowed, call a physician immediately. Loosen tight clothing such as a collar, tie, belt or waistband.

Notes to physician Symptomatic treatment and supportive therapy as indicated.Administer oxygen if necessary.Following severe exposure the patient should be kept under medical review for at least 48 hours as delayed pulmonary oedema may develop.

Section 5. Fire Fighting Measures

Auto-ignition temperature Not available.

Flash points Closed cup: >230°C (446°F). (Cleveland.)

Flammable Limits Not available.

Products of Combustion Thermal decomposition products are toxic and may include oxides of carbon and nitrogen, amines, possibly other irritating gases.

Fire-fighting media and instructions SMALL FIRE: Use dry chemical powder.
LARGE FIRE: Use water spray, fog or foam. Do not use water jet.

Protective Clothing (Fire) Splash goggles. Full suit. Boots. Gloves. Self-contained breathing apparatus (SCBA) should be used to avoid inhalation of the product.

Section 6. Accidental Release Measures

For major spills call Chemtrec (800-424-9300).

SEE MATERIAL SAFETY DATA SHEET Section 8. Exposure controls, personal protection

Small Spill and Leak Corrosive liquid.
Dilute with water and mop up, or absorb with an inert dry material and place in an appropriate waste disposal container.

Large Spill and Leak Corrosive liquid.
Stop leak if without risk. Absorb with DRY earth, sand or other non-combustible material. Do not get water inside container. Absorb with an inert material and put the spilled material in an appropriate waste disposal. Do not touch spilled material. Use water spray curtain to divert vapor drift. Prevent entry into sewers, basements or confined areas; dike if needed. Eliminate all ignition sources. Call for assistance on disposal. Be careful that the product is not present at a concentration level above TLV. Check TLV on the MSDS and with local authorities.

Section 7. Handling and Storage

Handling Avoid contact with eyes, skin and clothing. Do not ingest. Avoid breathing vapors or spray mists. Keep container closed. Use only with adequate ventilation. Wash thoroughly after handling.

Storage Keep container tightly closed. Keep container in a cool, well-ventilated area.

Section 8. Exposure controls, personal protection

Preventive Measures Conditions of use, adequacy of engineering or other control measures, and actual exposures will dictate the need for specific protective devices at your workplace.

Engineering Controls Use local exhaust ventilation to maintain airborne concentrations below the TLV. Suitable respiratory equipment should be used in cases of insufficient ventilation or where operational procedures demand it. For guidance on engineering control measures refer to publications such as the ACGIH current edition of 'Industrial Ventilation, a manual of Recommended Practice.'

Personal Protection

Eyes Chemical safety goggles. If there is a potential for splashing, use a full face shield.

Body and Hands Full chemical suit.
Gloves.

Respiratory Wear appropriate respirator when ventilation is inadequate.

Consult your supervisor or S.O.P. for special handling instructions.

Personal Protection in Case of a Large Spill Splash goggles. Full suit. Vapor respirator or self-contained breathing apparatus (SCBA). Boots. Gloves. Suggested protective clothing might not be adequate. Consult a specialist before handling this product.

Product Name	Exposure Limits
Ethylene glycol	**ACGIH TLV (United States, 5/2004). Notes: See Notice of Intended changes. Refers to Appendix A -- Carcinogens.** CEIL: 100 mg/m³ Form: Aerosol **OSHA PEL 1989 (United States, 3/1989).** CEIL: 125 mg/m³ Form: All forms CEIL: 50 ppm Form: All forms

Section 9. Physical and Chemical Properties

Physical state and Appearance	Liquid.
pH	Not available.
Boiling/Condensation Point	Not available.
Melting/Freezing Point	Not available.
Specific Gravity	1.04 (Water = 1)
Evaporation Rate	Not available.
Flash points	Closed cup: >230°C (446°F). (Cleveland.)

Section 10. Stability and Reactivity

Stability and reactivity	The product is stable.
Conditions of Instability	Not available.
Incompatibility with Various Substances	Slightly reactive to reactive with oxidizing agents
Hazardous Decomposition Products	Thermal decomposition products are toxic and may include oxides of carbon and nitrogen, amines, possibly other irritating gases.
Hazardous Polymerization	Will not occur.

Section 11. Toxicological Information

Toxicity Data

Ingredient Name	Test	Result	Route	Species

Polyether polyol	LD50	>5000 mg/kg	Oral	Rat
	LD50	>2000 mg/kg	Dermal	Rabbit
1,4 butanediol	LD50	1525 mg/kg	Oral	Rat
	LD50	2180 mg/kg	Oral	Mouse
	LD50	2531 mg/kg	Oral	Rabbit
	LD50	>2000 mg/kg	Dermal	Rabbit
	LC50	5.1 to 15 mg/l (4 hour/hours)	Inhalation	Rat
Ethylene glycol	LD50	4000 to 6140 mg/kg	Oral	Rat
	LD50	14600 mg/kg	Oral	Mouse
	LD50	>2000 mg/kg	Dermal	Rabbit

Inhalation Hazardous in case of inhalation. Inhalation of the spray mist may produce severe irritation of respiratory tract, characterized by coughing, choking, or shortness of breath.

Skin Contact Hazardous in case of skin contact (corrosive, sensitizer). Skin contact may produce burns.

Eye contact Hazardous in case of eye contact (corrosive).

Ingestion May cause burns to mouth, throat and stomach.

Remarks At the present time, there is no direct evidence to suggest that ethylene glycol produces birth defects in humans under normal conditions of use and exposure. Ethylene glycol has caused teratogenic and fetotoxic effects in rats and mice following the administration of high doses in drinking water or by gavage even in the absence of maternal toxicity. Repeated exposure may produce adverse effects on the central nervous system, liver and kidneys. [MONOETHYLENE GLYCOL (MEG)]

Remarks This chemical has produced mild skin sensitization in an amimal study. However, skin sensitization has not been seen in humans following many years experience in the manufacture and use of this chemical. [POLYMER OF GLYCEROL/EO/PO] Repeated exposure may produce adverse effects on the central nervous system, liver and kidneys. [1,4-BUTANEDIOL]

Carcinogenic remarks **The ingredients of this product are not classified as carcinogenic by ACGIH or IARC, not regulated as carcinogens by OSHA, and not listed as carcinogens by NTP.**

Mutagenic Effects None known.

Reproductive Effects See remarks.

Teratogenic effects See remarks.

Section 12. Ecological Information

Ecotoxicity Not available.

Section 13. Disposal Considerations

Waste Information Non-hazardous waste.The generation of waste should be avoided or minimized wherever possible. Dispose of waste material at an approved waste treatment/disposal facility in accordance with applicable local, provincial and federal regulations. Do not dispose of waste with normal garbage, or to sewer systems. Empty containers should be decontaminated and either passed to an approved drum recycler or destroyed.

Section 14. Transport Information

Transportation Emergency Number 1-800-424-9300 (CHEMTREC).

DOT Classification Not regulated.

TDG Classification Not regulated.

IMO/IMDG Classification Not regulated.

ICAO/IATA Classification Not regulated.

Section 15. Regulatory Information

U.S. Federal Regulations

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

HCS Classification Sensitizing material
Target organ effects
Corrosive Material
Reproductive toxin

TSCA 8(b) inventory:All Ingredients Listed.

CERCLA (Comprehensive Environmental Response, Compensation and Liability Act):
ETHYLENE GLYCOL (CAS # 107-21-1) Reportable quantity(RQ) 5000 lbs
Any spill or release above the RQ must be reported to the National Response Center (800-424-8802).

SARA Title III Section 313 (40 CFR Part 372): SARA 313 toxic chemical notification and release reporting: ETHYLENE GLYCOL 1.90%

This product does not contain nor is it manufactured with ozone depleting substances.

State Regulations

California Prop. 65: No ingredients listed.

Canadian Regulations

This product has been classified in accordance with the hazard criteria of the CPR (Controlled Products Regulations) and this MSDS (Material Safety Data Sheet) contains all the information required by the CPR.

WHMIS (Canada) Class D-2A: Material causing other toxic effects (Very toxic).
Class D-2B: Material causing other toxic effects (Toxic).
Class E: Corrosive material

CEPA DSL/NDSL:All Ingredients Listed.

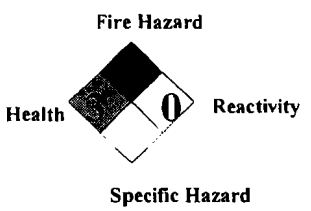
Section 16. Other Information

CAUSES EYE AND SKIN BURNS.
MAY BE HARMFUL IF INHALED OR SWALLOWED.
MAY CAUSE ALLERGIC SKIN REACTION.
CONTAINS MATERIAL WHICH MAY CAUSE DAMAGE TO THE FOLLOWING ORGANS: KIDNEYS, NERVOUS SYSTEM, REPRODUCTIVE SYSTEM, LIVER, BRAIN, EYES, CENTRAL NERVOUS SYSTEM.

Hazardous Material Information System (U.S.A.)

Health	3
Fire Hazard	1
Reactivity	0

National Fire Protection Association (U.S.A.)



Trademarks: DALTOPED® is a registered trademark of Huntsman LLC or an affiliate thereof in one or more countries, but not all countries.

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THE PRODUCT MAY PRESENT HAZARDS AND SHOULD BE USED WITH CAUTION. WHILE CERTAIN HAZARDS ARE DESCRIBED IN THIS PUBLICATION, NO GUARANTEE IS MADE THAT THESE ARE THE ONLY HAZARDS THAT EXIST.

Hazards, toxicity, and behavior of the products may differ when used with other materials and are dependent upon the manufacturing circumstances or other processes. Such hazards, toxicity and behavior should be determined by the user and made known to handlers, processors and end users.

NO PERSON OR ORGANIZATION EXCEPT A DULY AUTHORIZED HUNTSMAN EMPLOYEE IS AUTHORIZED TO PROVIDE, OR MAKE AVAILABLE, DATA SHEETS FOR HUNTSMAN PRODUCTS. DATA SHEETS FROM UNAUTHORIZED SOURCES MAY CONTAIN INFORMATION THAT IS NO LONGER CURRENT OR ACCURATE. NO PART OF THIS DATA SHEET MAY BE REPRODUCED OR TRANSMITTED IN ANY FORM, OR BY ANY MEANS, WITHOUT PERMISSION IN WRITING FROM HUNTSMAN. ALL REQUESTS FOR PERMISSION TO REPRODUCE MATERIAL FROM THIS DATA SHEET SHOULD BE DIRECTED TO HUNTSMAN, MANAGER, PRODUCT SAFETY, AT THE ABOVE ADDRESS.

Verified by newhodm.
Printed 2/13/2006.

EXHIBIT
VI

Date: 5/11/2006.

HUNTSMAN

Material Safety Data Sheet

Section 1. Chemical Product and Company Identification

Product name DALTOPED® LF 22746 **MSDS #00025194**

Huntsman Polyurethanes (an international business unit of Huntsman International LLC.)

10003 Woodloch Forest Drive
The Woodlands, TX 77380
For Polyurethanes product information/assistance:
The Woodlands: (800) 257-5547
Auburn Hills: (800) 553-8624
Canada: (905) 678-9150

In Case of Emergency
Spills Leaks Fire or Exposure Call Chemtrec: (800) 424-9300
Medical Emergency Information: (800) 328-8501

Section 2. Composition, information on ingredients

Name	CAS #	% by Weight
Polyether polyol	9082-00-2	60 - 100
Ethylene glycol	107-21-1	3 - 7

* Occupational Exposure Limit(s), if available, are listed in section 8

Section 3. Hazards Identification

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

Physical state and Appearance Liquid.

MAY BE HARMFUL IF SWALLOWED.
CONTAINS MATERIAL WHICH MAY CAUSE BIRTH DEFECTS, BASED ON ANIMAL DATA.

Potential Acute Health Effects

Eyes Slightly hazardous in case of eye contact (irritant).

Skin Slightly hazardous in case of skin contact (irritant).

Inhalation Slightly hazardous in case of inhalation.

Ingestion Hazardous in case of ingestion.

GENERAL INFORMATION Read the entire MSDS for a more thorough evaluation of the hazards.

Section 4. First Aid Measures

Eye contact Check for and remove any contact lenses. In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Cold water may be used. Get medical attention if irritation occurs.

Skin Contact Wash with soap and water. Cold water may be used.Get medical attention if symptoms occur.

Inhalation If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention if symptoms appear.

Ingestion Do NOT induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. If large quantities of this material are swallowed, call a physician immediately. Loosen tight clothing such as a collar, tie, belt or waistband.

Notes to physician Symptomatic. Treatment and supportive therapy as indicated.

Section 5. Fire Fighting Measures

Auto-ignition temperature Not available.

Flash points Closed cup: >230°C (446°F).

Flammable Limits Not available.

Products of Combustion Thermal decomposition products are toxic and may include oxides of carbon and nitrogen, amines, possibly other irritating gases.

Fire-fighting media and instructions SMALL FIRE: Use DRY chemical powder.
LARGE FIRE: Use water spray, fog or foam. Do not use water jet.

Protective Clothing (Fire) Splash goggles. Full suit. Boots. Gloves. A self-contained breathing apparatus should be used to avoid inhalation of the product.

Section 6. Accidental Release Measures

For major spills call Chemtrec (800-424-9300).

SEE MATERIAL SAFETY DATA SHEET Section 8. Exposure controls, personal protection

Small Spill and Leak Dilute with water and mop up, or absorb with an inert dry material and place in an appropriate waste disposal container.

Large Spill and Leak Stop leak if without risk. Absorb with dry earth, sand or other non-combustible material. Do not allow water to enter container. Do not touch spilled material. Use water spray curtain to divert vapor drift. Prevent entry into sewers, basements or confined areas. Dike if necessary. Eliminate all ignition sources. Call for assistance on disposal. Be careful that the product is not present at a concentration level above TLV. Check TLV on the MSDS and with local authorities.

Section 7. Handling and Storage

Handling Do not ingest. Wash thoroughly after handling. Avoid contact with eyes, skin and clothing.

Storage Keep container tightly closed. Keep container in a cool, well-ventilated area. Do not store above 40°C (104°F).

Section 8. Exposure controls, personal protection

Preventive Measures Conditions of use, adequacy of engineering or other control measures, and actual exposures will dictate the need for specific protective devices at your workplace.

Engineering Controls Use local exhaust ventilation to maintain airborne concentrations below the TLV. Suitable respiratory equipment should be used in cases of insufficient ventilation or where operational procedures demand it. For guidance on engineering control measures refer to publications such as the ACGIH current edition of 'Industrial Ventilation, a manual of Recommended Practice.'

Personal Protection

Eyes Chemical safety goggles. If there is a potential for splashing, use a full face shield.

Body and Hands Lab coat.
Gloves.

Respiratory Wear appropriate respirator when ventilation is inadequate.

Consult your supervisor or S.O.P. for special handling directions

Personal Protection in Case of a Large Spill Splash goggles. Full suit. Vapor respirator or self-contained breathing apparatus (SCBA). Boots. Gloves. Suggested protective clothing might not be adequate. Consult a specialist before handling this product.

Product Name	Exposure Limits
Ethylene glycol	**ACGIH TLV (United States, 5/2004). Notes: See Notice of Intended changes. Refers to Appendix A – Carcinogens.** CEIL: 100 mg/m^3 Form: Aerosol **OSHA PEL 1989 (United States, 3/1989).** CEIL: 125 mg/m^3 Form: All forms CEIL: 50 ppm Form: All forms

Section 9. Physical and Chemical Properties

Physical state and Appearance	Liquid.
pH	Not available.
Boiling/Condensation Point	Not available.
Melting/Freezing Point	Not available.
Evaporation Rate	Not available.

Flash points Closed cup: >230°C (446°F).

Section 10. Stability and Reactivity

Stability and reactivity The product is stable.

Conditions of Instability Not available.

Incompatibility with Various Substances Slightly reactive to reactive with alkalis.

Hazardous Decomposition Products Thermal decomposition products are toxic and may include oxides of carbon and nitrogen, amines, possibly other irritating gases.

Hazardous Polymerization Will not occur.

Section 11. Toxicological Information

Toxicity Data

Ingredient Name	Test	Result	Route	Species
Polyether polyol	LD50	>5000 mg/kg	Oral	Rat
	LD50	>2000 mg/kg	Dermal	Rabbit
Ethylene glycol	LD50	4000 to 6140 mg/kg	Oral	Rat
	LD50	14600 mg/kg	Oral	Mouse
	LD50	>2000 mg/kg	Dermal	Rabbit

Inhalation Slightly hazardous in case of inhalation.

Skin Contact Slightly hazardous in case of skin contact (irritant).

Eye contact Slightly hazardous in case of eye contact (irritant).

Ingestion Hazardous in case of ingestion.

Remarks This chemical has produced mild skin sensitization in an amimal study. However, skin sensitization has not been seen in humans following many years experience in the manufacture and use of this chemical. [POLYMER OF GLYCEROL/EO/PO]
At the present time, there is no direct evidence to suggest that ethylene glycol produces birth defects in humans under normal conditions of use and exposure. Ethylene glycol has caused teratogenic and fetotoxic effects in rats and mice following the administration of high doses in drinking water or by gavage even in the absence of maternal toxicity. Repeated exposure may produce adverse effects on the central

nervous system, liver and kidneys. [ETHYLENE GLYCOL]

Carcinogenic remarks **The ingredients of this product are not classified as carcinogenic by ACGIH or IARC, not regulated as carcinogens by OSHA, and not listed as carcinogens by NTP.**

Mutagenic Effects None known.

Reproductive Effects See remarks.

Teratogenic effects See remarks.

Section 12. Ecological Information

Ecotoxicity Not available.

Section 13. Disposal Considerations

Waste Information Non-hazardous waste.The generation of waste should be avoided or minimized wherever possible. Dispose of waste material at an approved waste treatment/disposal facility in accordance with applicable local, provincial and federal regulations. Do not dispose of waste with normal garbage, or to sewer systems. Empty containers should be decontaminated and either passed to an approved drum recycler or destroyed.

Section 14. Transport Information

Transportation Emergency Number 1-800-424-9300 (CHEMTREC).

DOT Classification Not regulated.

TDG Classification Not regulated.

IMO/IMDG Classification Not regulated.

ICAO/IATA Classification Not regulated.

Section 15. Regulatory Information

U.S. Federal Regulations

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

HCS Classification Toxic
Irritating material
Target organ effects

TSCA 8(b) inventory:All Ingredients Listed.

CERCLA (Comprehensive Environmental Response, Compensation and Liability Act):
ETHYLENE GLYCOL (CAS # 107-21-1) Reportable quantity(RQ) 5000 lbs
Any spill or release above the RQ must be reported to the National Response Center (800-424-8802).

SARA Title III Section 313 (40 CFR Part 372):

ETHYLENE GLYCOL 3 - 7

This product does not contain nor is it manufactured with ozone depleting substances.

State Regulations

California Prop. 65: No ingredients listed.

Canadian Regulations

This product has been classified in accordance with the hazard criteria of the CPR (Controlled Products Regulations) and this MSDS (Material Safety Data Sheet) contains all the information required by the CPR.

WHMIS (Canada) Class D-2A: Material causing other toxic effects (Very toxic).
Class D-2B: Material causing other toxic effects (Toxic).

CEPA DSL/NDSL:All Ingredients Listed.

Section 16. Other Information

MAY BE HARMFUL IF SWALLOWED.
CONTAINS MATERIAL WHICH MAY CAUSE BIRTH DEFECTS, BASED ON ANIMAL DATA.

Fire Hazard

HUNTSMAN

Date: 5/11/2006.

DALTOPED® LF 22746

Hazardous Material Information System (U.S.A.)

Health	1
Fire Hazard	1
Reactivity	0

National Fire Protection Association (U.S.A.)

Trademarks: DALTOPED® is a registered trademark of Huntsman LLC or an affiliate thereof in one or more countries, but not all countries.

Verified by newhodm.

Printed 5/11/2006.

EXHIBIT
V11

HUNTSMAN

Date: 3/30/2006.

Material Safety Data Sheet

Section 1. Chemical Product and Company Identification

Product name **DALTOPED® LP 55753** MSDS #00032548

Huntsman Polyurethanes (an international business unit of Huntsman International LLC.)

10003 Woodloch Forest Drive
The Woodlands, TX 77380
For Polyurethanes product information/assistance:
The Woodlands: (800) 257-5547
Auburn Hills: (800) 553-8624
Canada: (905) 678-9150

In Case of Emergency

Spills Leaks Fire or Exposure Call Chemtrec: (800) 424-9300
Medical Emergency Information: (800) 328-8501

Section 2. Composition, information on ingredients

Name	CAS #	% by Weight
Polyester polyol	25214-18-0	60 - 100
1,4 butanediol	110-63-4	13 - 30

*** Occupational Exposure Limit(s), if available, are listed in section 8**

Section 3. Hazards Identification

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

Physical state and Appearance Liquid.

Potential Acute Health Effects

Eyes Hazardous in case of eye contact (irritant).

Skin Slightly hazardous in case of skin contact (irritant).

Inhalation Slightly hazardous in case of inhalation. (respiratory tract irritation)

Ingestion Hazardous in case of ingestion.

GENERAL INFORMATION Read the entire MSDS for a more thorough evaluation of the hazards.

Section 4. First Aid Measures

Eye contact Check for and remove any contact lenses. In case of contact, immediately flush eyes with plenty of water for at least 15 minutes. Cold water may be used. Get medical attention.

Skin Contact Wash with soap and water. Cold water may be used.Get medical attention if symptoms occur.

Inhalation If inhaled, remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Get medical attention if symptoms appear.

Ingestion Do not induce vomiting unless directed to do so by medical personnel. Never give anything by mouth to an unconscious person. Loosen tight clothing such as a collar, tie, belt or waistband. Get medical attention if symptoms appear.

Notes to physician Symptomatic and supportive therapy as needed. Following severe exposure medical follow-up should be monitored for at least 48 hours.

Section 5. Fire Fighting Measures

Auto-ignition temperature Not available.

Flash points Closed cup: 110°C (230°F). (Cleveland.)

Flammable Limits Not available.

Products of Combustion Thermal decomposition products are toxic and may include oxides of carbon and nitrogen, amines, possibly other irritating gases.

Fire-fighting media and instructions SMALL FIRE: Use dry chemical powder.
LARGE FIRE: Use water spray, fog or foam. Do not use water jet.

Protective Clothing (Fire) Splash goggles. Full suit. Boots. Gloves. Self-contained breathing apparatus (SCBA) should be used to avoid inhalation of the product.

Section 6. Accidental Release Measures

For major spills call Chemtrec (800-424-9300).

SEE MATERIAL SAFETY DATA SHEET
Section 8. Exposure controls, personal protection

Small Spill and Leak Dilute with water and mop up if water-soluble or absorb with an inert dry material and place in an appropriate waste disposal container. Finish cleaning by spreading water on the contaminated surface and dispose of according to local and regional authority requirements.

Large Spill and Leak Absorb with an inert material and transfer the spilled material and absorbent to an appropriate waste disposal container. Be careful that the product is not present at a concentration level above the TLV. Check TLV on the MSDS and with local authorities.

Section 7. Handling and Storage

Handling Avoid contact with eyes, skin and clothing. Wash thoroughly after handling.

Storage Keep container tightly closed. Keep container in a cool, well-ventilated area.

Section 8. Exposure controls, personal protection

Preventive Measures Conditions of use, adequacy of engineering or other control measures, and actual exposures will dictate the need for specific protective devices at your workplace.

Engineering Controls Use local exhaust ventilation to maintain airborne concentrations below the TLV. Suitable respiratory equipment should be used in cases of insufficient ventilation or where operational procedures demand it. For guidance on engineering control measures refer to publications such as the ACGIH current edition of 'Industrial Ventilation, a manual of Recommended Practice.'

Personal Protection

Eyes Chemical safety goggles. If there is a potential for splashing, use a full face shield.

Body and Hands Lab coat.
Gloves.

Respiratory Wear appropriate respirator when ventilation is inadequate.

Consult your supervisor or S.O.P. for special handling instructions.

Personal Protection in Case of a Large Spill	Splash goggles. Full suit. Vapor respirator or self-contained breathing apparatus (SCBA). Boots. Gloves. Suggested protective clothing might not be adequate. Consult a specialist before handling this product.

Product Name	Exposure Limits
No occupational exposure limits have been assigned.	

Section 9. Physical and Chemical Properties

Physical state and Appearance	Liquid.
pH	Not available.
Boiling/Condensation Point	Not available.
Melting/Freezing Point	Not available.
Evaporation Rate	Not available.
Flash points	Closed cup: 110°C (230°F). (Cleveland.)

Section 10. Stability and Reactivity

Stability and reactivity	The product is stable.
Conditions of Instability	Not available.
Incompatibility with Various Substances	Slightly reactive to reactive with oxidizing agents.
Hazardous Decomposition Products	Thermal decomposition products are toxic and may include oxides of carbon and nitrogen, amines, possibly other irritating gases.

Hazardous Polymerization Will not occur.

Section 11. Toxicological Information

Toxicity Data

Ingredient Name	Test	Result	Route	Species
1,4 butanediol	LD50	1525 mg/kg	Oral	Rat
	LD50	2180 mg/kg	Oral	Mouse
	LD50	2531 mg/kg	Oral	Rabbit
	LD50	>2000 mg/kg	Dermal	Rabbit
	LC50	5.1 to 15 mg/l (4 hour/hours)	Inhalation	Rat

Inhalation Slightly hazardous in case of inhalation. (respiratory tract irritation)

Skin Contact Slightly hazardous in case of skin contact (irritant).

Eye contact Hazardous in case of eye contact (irritant).

Ingestion Hazardous in case of ingestion.

Remarks Repeated exposure may produce adverse effects on the central nervous system, liver and kidneys. [1,4-BUTANEDIOL]

Carcinogenic remarks **The ingredients of this product are not classified as carcinogenic by ACGIH or IARC, not regulated as carcinogens by OSHA, and not listed as carcinogens by NTP.**

Mutagenic Effects None known.

Reproductive Effects None known.

Teratogenic effects None known.

Section 12. Ecological Information

Ecotoxicity Not available.

Section 13. Disposal Considerations

Waste Information Non-hazardous waste.The generation of waste should be avoided or minimized wherever possible. Dispose of waste material at an approved waste treatment/disposal facility in accordance with applicable local, provincial and federal regulations. Do not dispose of waste with normal garbage, or to sewer systems. Empty containers should be decontaminated and either passed to an approved drum recycler or destroyed.

Section 14. Transport Information

Transportation Emergency Number 1-800-424-9300 (CHEMTREC).

DOT Classification Not regulated.

TDG Classification Not regulated.

IMO/IMDG Classification Not regulated.

ICAO/IATA Classification Not regulated.

Section 15. Regulatory Information

U.S. Federal Regulations

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

HCS Classification Target organ effects
Irritating material

TSCA 8(b) inventory:All Ingredients Listed.

SARA Title III Section 313 (40 CFR Part 372):

No ingredients listed.

This product does not contain nor is it manufactured with ozone depleting substances.

State Regulations

California Prop. 65: No ingredients listed.

Canadian Regulations

This product has been classified in accordance with the hazard criteria of the CPR (Controlled Products Regulations) and this MSDS (Material Safety Data Sheet) contains all the information required by the CPR.

WHMIS (Canada) Class D-2B: Material causing other toxic effects (Toxic).

CEPA DSL/NDSL:All Ingredients Listed.

Section 16. Other Information

MAY CAUSE EYE IRRITATION.
CONTAINS MATERIAL WHICH MAY CAUSE DAMAGE TO THE FOLLOWING ORGANS: KIDNEYS, NERVOUS SYSTEM, LIVER, EYES, CENTRAL NERVOUS SYSTEM.

Hazardous Material Information System (U.S.A.)

Health	1
Fire Hazard	1
Reactivity	0

National Fire Protection Association (U.S.A.)

Trademarks: DALTOPED is a registered trademark of Huntsman LLC or an affiliate thereof in one or more countries, but not all countries.

Verified by cliftj.
Printed 3/30/2006.

EXHIBIT
VIII

HUNTSMAN

Date: 1/26/2006.

Material Safety Data Sheet

Section 1. Chemical Product and Company Identification

Product name SUPRASEC® 2000 **MSDS #00004564**

Product Use Component of a Polyurethane System

Huntsman Polyurethanes (an international business unit of Huntsman International LLC.)

10003 Woodloch Forest Drive
The Woodlands, TX 77380
For Polyurethanes product information/assistance:
The Woodlands: (800) 257-5547
Auburn Hills: (800) 553-8624
Canada: (905) 678-9150

In Case of Emergency:
Spills Leaks Fire or Exposure Call Chemtrec: (800) 424-9300
Medical Emergency Information: (800) 328-8501

Section 2. Composition, information on ingredients

Hazardous ingredients

	%	CAS#
4,4'-Diphenylmethane-Diisocyanate	46	101-68-8
Modified MDI	44	Not Disclosed
Diisooctylphthalate	1-10	27554-26-3

* Occupational Exposure Limit(s), if available, are listed in section 8

Section 3. Hazards Identification

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

Physical state and Appearance Liquid. (Liquid.)

Emergency Overview Reacts slowly with water to produce carbon dioxide which may rupture closed containers. This reaction accelerates at higher temperatures.

Inhalation at levels above the occupational exposure limit could cause respiratory sensitization and risk of serious damage to respiratory system. The onset of the respiratory symptoms may be delayed for several hours after exposure. A hyper-reactive response to even minimal concentrations of diisocyanates may develop in sensitized persons.

Potential Acute Health Effects

Eyes Hazardous in case of eye contact (irritant).

Skin Hazardous in case of skin contact (irritant,sensitizer). Skin inflammation is characterized by itching, scaling or reddening.

Inhalation Hazardous in case of inhalation (lung irritant,lung sensitizer).

Ingestion Slightly hazardous in case of ingestion.

Medical conditions aggravated by over-exposure May cause or aggravate dermititis and asthma.

GENERAL INFORMATION Read the entire MSDS for a more thorough evaluation of the hazards.

Section 4. First Aid Measures

Eye contact Immediately flush eyes with running water for at least 15 minutes, keeping eyelids open. Seek immediate medical attention.

Skin Contact Remove contaminated clothing. After contact with skin, wash immediately with plenty of warm soapy water. If symptoms develop, obtain medical attention. Contaminated clothing should be thoroughly cleaned. An MDI study has demonstrated that a polyglycol-based skin cleanser or corn oil may be more effective than soap and water.

Inhalation Remove patient from exposure, keep warm and at rest. Obtain immediate medical attention. Treatment is symptomatic for primary irritation or bronchospasm. If breathing is labored, oxygen should be given by administered by qualified personnel. Apply artificial respiration if breathing has ceased or shows signs of failing.

Ingestion Do not induce vomiting. Provided the patient is conscious, wash out mouth with water. Obtain immediate medical attention.

Notes to physician Symptomatic and supportive therapy as needed. Following severe exposure medical follow-up should be monitored for at least 48 hours.

Section 5. Fire Fighting Measures

Auto-ignition temperature >600 °C

Flash points Closed cup: >100°C (212°F).

Flammable Limits Not available.

Products of Combustion Carbon monoxide., Carbon dioxide.,Nitrous Oxide and HCN.

Fire-fighting media and instructions SMALL FIRE: Use dry chemical powder.
LARGE FIRE: Use water spray, fog or foam. Do not use water jet.

Protective Clothing (Fire) Splash goggles. Full suit. Boots. Gloves. Self-contained breathing apparatus (SCBA) should be used to avoid inhalation of the product.

Special Remarks on Fire Hazards Reacts slowly with water to produce carbon dioxide which may rupture closed containers. This reaction accelerates at higher temperatures.

Section 6. Accidental Release Measures

For major spills call Chemtrec (800-424-9300).

SEE MATERIAL SAFETY DATA SHEET Section 8. Exposure controls, personal protection

Small Spill and Leak Clean-up should only be performed by trained personnel. People dealing with major spillages should wear full protective clothing including appropriate respiratory protection. Evacuate the area. Prevent further leakage, spillage or entry into drains.

Large Spill and Leak Contain and absorb large spillages onto an inert, non-flammable adsorbent carrier (such as earth or sand). Shovel into open-top drums or plastic bags for further decontamination, if necessary. Wash the spillage area clean with liquid decontaminant. Test atmosphere for MDI. Neutralize small spillages with decontaminant. Remove and properly dispose of residues. (See Section 13 for disposal considerations.) Notify applicable government authorities if release is reportable. The CERCLA RQ for 4,4-MDI is 5,000 lbs (see CERCLA in Section 15).

Decontaminant Preparation of Decontamination Solution: Prepare a decontamination solution of 0.2-0.5% liquid detergent and 3-8% concentrated ammonium hydroxide in water (5-10% sodium carbonate may be substituted for the ammonium hydroxide). Follow the precautions on the supplier's material safety data sheets when preparing and using solution. Use of Decontamination Solution: Allow deactivated material to stand for at least 30 minutes before shoveling into drums. Do not tighten the bungs. Mixing with wet earth is also effective, but slower.

Section 7. Handling and Storage

Handling Avoid personal contact with the product or reaction mixture. Use only with adequate ventilation to ensure that the occupational exposure limit is not exceeded. The efficiency of the ventilation system must be monitored regularly because of the possibility of blockage. Avoid breathing aerosols, mists and vapors. (See Section 8--Exposure Control for details.)

Storage Keep containers properly sealed and when stored indoors, in a well ventilated area. Keep contents away from moisture. Due to reaction with water, producing CO2-gas, a hazardous build-up of pressure could result if contaminated containers are re-sealed. Do not reseal contaminated containers. Uncontaminated containers, free of moisture, may be resealed only after placing under a nitrogen blanket. Do not store in containers made of copper, copper alloys or galvanized surfaces.

Ideal storage temperature is 16-38°C (60-100°F).

Keep stocks of decontaminant (See Section 6) readily available.

Section 8. Exposure controls, personal protection

Preventive Measures Conditions of use, adequacy of engineering or other control measures, and actual exposures will dictate the need for specific protective devices at your workplace.

Engineering Controls Use local exhaust ventilation to maintain airborne concentrations below the TLV. Suitable respiratory equipment should be used in cases of insufficient ventilation or where operational procedures demand it. For guidance on engineering control measures refer to publications such as the ACGIH current edition of 'Industrial Ventilation, a manual of Recommended Practice.'

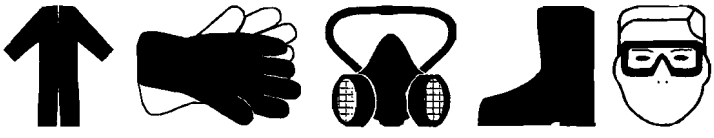
Personal Protection

Eyes Chemical safety goggles. If there is a potential for splashing, use a full face shield.

Body and Hands The following protective materials are recommended: Gloves - neoprene, nitrile rubber, butyl rubber. Thin latex disposable gloves should be avoided for repeated or long term use. Protective clothing should be selected and used in accordance with 'Guidelines for the Selection of Chemical Protective Clothing' published by ACGIH.

Respiratory When the product is sprayed or heated without adequate ventilation, an approved MSHA/NIOSH positive-pressure, supplied-air respirator may be required. Air purifying respirators equipped with organic vapor cartridges and a HEPA (P100) particulate filter may be used under certain conditions when a cartridge change-out schedule has been developed in accordance with the OSHA respiratory protection standard (29 C.F.R. 1910.134).

Protective Clothing (Pictograms)



Consult your supervisor or S.O.P. for special handling instructions.

Personal Protection in Case of a Large Spill Splash goggles. Full suit. Vapor respirator or self-contained breathing apparatus (SCBA). Boots. Gloves. Suggested protective clothing might not be adequate. Consult a specialist before handling this product.

Product Name

4,4-Diphenylmethane Diisocyanate

Exposure Limits

ACGIH TLV	0.05 mg/m3 (8-hour,40 hours/week)
OSHA PEL Ceiling Limit	0.20 mg/m3
NIOSH REL/TWA	0.05 mg/m3 (10-hour,40 hours/week)
NIOSH REL/CEILING	0.20 mg/m3 (10-minute)

Exposure controls/personal protection Medical supervision of all employees who handle or come in contact with respiratory sensitizers is recommended. Persons with respiratory problems including asthmatic-type conditions, chronic bronchitis, other chronic respiratory diseases or recurrent skin eczema or skin allergies should be evaluated for their suitability of working with this product. Once a person is diagnosed as sensitized, no further exposure to the material that caused the sensitization should be permitted.The Occupational Exposure Limits listed do not apply to previously sensitised individuals. Sensitised individuals should be removed from any further exposure.

Section 9. Physical and Chemical Properties

Physical state and Appearance	Liquid. (Liquid.)
Odor	slightly musty
pH	Not applicable.
Boiling/Condensation Point	>300 °C decomposes
Melting/Freezing Point	Not available.
Vapor Pressure	0.000004 mmHg
Vapor Density	8.5
Evaporation Rate	Not available.
Flash points	Closed cup: >100°C (212°F).

Section 10. Stability and Reactivity

Stability and reactivity	Stable at room temperature.
Conditions of Instability	Avoid high temperatures. Avoid freezing.
Incompatibility with Various Substances	This product will react with any materials containing active hydrogens such as water, alcohol, amines, bases and acids. The reaction with water is very slow under 50°C (122°F) but is accelerated at higher temperatures. Some reactions may be violent.
Hazardous Decomposition Products	Carbon monoxide., Carbon dioxide.,Nitrous Oxide and HCN.
Hazardous Polymerization	Polymerization may occur at elevated temperatures in the presence of alkalies, tertiary amines and metal compounds.

Section 11. Toxicological Information

Toxicity to Animals

LD50 Rat Oral: > 5000 mg/kg
LD50 Rabbit Dermal: > 5000 mg/kg
LC50 Rat Respirable aerosol: 2240 mg/m^3 1 hours
LC50 Rat Respirable aerosol: 490 mg/m^3 4 hours

Inhalation

This product is a respiratory irritant and potential respiratory sensitizer. Repeated inhalation of vapor or aerosol at levels above the occupational exposure limit could cause respiratory sensitization. Symptoms may include irritation to the eyes, nose, throat, and lungs, possibly combined with dryness of the throat, tightness of chest and difficulty in breathing. The onset of the respiratory symptoms may be delayed for several hours after exposure. A hyper-reactive response to even minimal concentrations of MDI may develop in sensitized persons.

Skin Contact

Moderate irritant. Repeated and/or prolonged contact may cause skin sensitization. There is limited evidence from animal studies that skin contact may play a role in respiratory sensitization. These results emphasize the need for protective clothing including gloves to be worn at all times when handling these chemicals or in maintenance work.

Eye contact

The vapor, aerosol, and liquid are irritant.

Ingestion

Ingestion may cause irritation of the gastrointestinal tract. Based on the acute oral LD50 this product is considered practically non-toxic by ingestion.

Remarks

Studies in animals have shown that doses produce adverse reproductive effects. Studies in animals have shown that repeated exposures produce developmental effects. [DIISOOCTYL PHTHALATE (DIOP)]

Carcinogenic Effects

The ingredients of this product are not classified as carcinogenic by ACGIH or IARC, not regulated as carcinogens by OSHA, and not listed as carcinogens by NTP.

Mutagenic Effects

There is no substantial evidence of mutagenic potential.

Reproductive Effects

No adverse reproductive effects are anticipated.

Teratogenic effects

No birth defects were seen in two independent animal (rat) studies. Fetotoxicity was observed at doses that were extremely toxic (including lethal) to the mother. Fetotoxicity was not observed at doses that were not maternally toxic. The doses used in these studies were maximal respirable concentrations well in excess of the defined occupational limits.

Remark

A study was conducted where groups of rats were exposed for 6 hours/day, 5 days/week for a lifetime to atmospheres of respirable polymeric MDI aerosol at concentrations of 0, 0.2, 1 or 6 mg/m3. No adverse effects were observed at 0.2 mg/m3. At the 1 mg/m3 concentration, minimal nasal and lung irritant effects were seen. Only at the top concentration (6.0 mg/m3) was there an increased incidence of a benign tumor of the lung (adenoma). One malignant pulmonary tumor (adenocarcinoma) was seen in the 6.0 mg/m3 group. MDI administration to rats in this study did not change the distribution and incidence of tumors from those seen in control animals. The increased incidence of lung tumors is associated with prolonged respiratory irritation and the concurrent accumulation of yellow material in the lung. In the absence of prolonged exposure to high concentrations leading to chronic irritation and lung damage, it is highly unlikely that tumor formation will occur. (MDI)

There are reports that chronic exposure to diisocyanates by inhalation may result in permanent decreases in lung function.

Section 12. Ecological Information

Ecotoxicity

Polymeric MDI. LC50 (Zebra Fish) > 1000 mg/l . EC50 (Daphnia magna) (24 hour) > 1000 mg/l EC50 (E. Coli) > 100 mg/l

Environmental Fate and Distribution

It is unlikely that significant environmental exposure in the air or water will arise based on consideration of the production and use of the substance.

Persistence and Degradation

Immiscible with water, but will react with water to produce inert and non-biodegradable solids.

Section 13. Disposal Considerations

Waste Information

The generation of waste should be avoided or minimized wherever possible.

Disposal should be in accordance with local, state, provincial or national regulations. This material is not a hazardous waste under RCRA 40 CFR 261. Small quantities should be treated with a decontaminant solution (See Section 6). The treated waste is not a hazardous material under RCRA 40 CFR 261. Chemical waste, even small quantities, should never be poured down drains, sewers or waterways.

Empty containers should be decontaminated and either passed to an approved drum recycler or destroyed.

Section 14. Transport Information

Transportation Emergency Number 1-800-424-9300 (CHEMTREC).

DOT Classification Single containers less than 5,000 lbs. are not regulated. Single containers with 5,000 lbs. or more of 4,4'-Methylene Diphenyl Diisocyanate are regulated as: Other Regulated Substances, Liquid, N.O.S. (Methylene Diphenyl Diisocyanate), 9, NA3082, PGIII, RQ.

TDG Classification Not regulated.

IMO/IMDG Classification Not regulated.

ICAO/IATA Classification Not regulated.

Section 15. Regulatory Information

U.S. Federal Regulations

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

HCS Classification Toxic
Irritating material
Sensitizing material
Target organ effects
Reproductive toxin

TSCA 8(b) inventory:All Ingredients Listed.

SARA Title III Section 313 (40 CFR Part 372): EPCRA Section 313 (40 CFR 372)

Diisocyanate Compounds (Category Code N120)	46%

EPCRA Section 313 (40 CFR 372) CERCLA (Comprehensive Environmental Response, Compensation and Liability Act): 4,4-Methylene diphenyl diisocyanate (CAS 101-68-8) has a 5,000 lb. RQ (reportable quantity). Any spill or release above the RQ must be reported to the National Response Center (800-424-8802).

This product does not contain nor is it manufactured with ozone depleting substances.

State Regulations

California Prop. 65: No ingredients listed.

Canadian Regulations

This product has been classified in accordance with the hazard criteria of the CPR (Controlled Products Regulations) and this MSDS (Material Safety Data Sheet) contains all the information required by the CPR.

WHMIS (Canada) Class D-1A: Material causing immediate and serious toxic effects (Very toxic).
Class D-2A: Material causing other toxic effects (Very toxic).
Class D-2B: Material causing other toxic effects (Toxic).

CEPA DSL/NDSL:All Ingredients Listed.

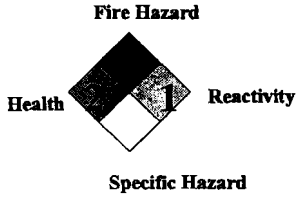
Section 16. Other Information

CAUSES DAMAGE TO THE FOLLOWING ORGANS: LUNGS, RESPIRATORY TRACT, SKIN, EYES. MAY BE HARMFUL IF INHALED. MAY CAUSE RESPIRATORY TRACT, EYE AND SKIN IRRITATION. MAY CAUSE ALLERGIC RESPIRATORY AND SKIN REACTION.

Hazardous Material Information System (U.S.A.)

Health	2
Fire Hazard	1
Reactivity	1

National Fire Protection Association (U.S.A.)



Trademarks: SUPRASEC® is a registered trademark of Huntsman LLC or an affiliate thereof in one or more countries, but not all countries.

Notice to Reader

While the information and recommendations in this publication are to the best of our knowledge, information and belief accurate at the date of publication, NOTHING HEREIN IS TO BE CONSTRUED AS A WARRANTY, EXPRESS OR OTHERWISE.

IN ALL CASES, IT IS THE RESPONSIBILITY OF THE USER TO DETERMINE THE APPLICABILITY OF SUCH INFORMATION AND RECOMMENDATIONS AND THE SUITABILITY OF ANY PRODUCT FOR ITS OWN PARTICULAR PURPOSE.

THE PRODUCT MAY PRESENT HAZARDS AND SHOULD BE USED WITH CAUTION. WHILE CERTAIN HAZARDS ARE DESCRIBED IN THIS PUBLICATION, NO GUARANTEE IS MADE THAT THESE ARE THE ONLY HAZARDS THAT EXIST.

Hazards, toxicity, and behavior of the products may differ when used with other materials and are dependent upon the manufacturing circumstances or other processes. Such hazards, toxicity and behavior should be determined by the user and made known to handlers, processors and end users.

NO PERSON OR ORGANIZATION EXCEPT A DULY AUTHORIZED HUNTSMAN EMPLOYEE IS AUTHORIZED TO PROVIDE, OR MAKE AVAILABLE, DATA SHEETS FOR HUNTSMAN PRODUCTS. DATA SHEETS FROM UNAUTHORIZED SOURCES MAY CONTAIN INFORMATION THAT IS NO LONGER CURRENT OR ACCURATE. NO PART OF THIS DATA SHEET MAY BE REPRODUCED OR TRANSMITTED IN ANY FORM, OR BY ANY MEANS, WITHOUT PERMISSION IN WRITING FROM HUNTSMAN. ALL REQUESTS FOR PERMISSION TO REPRODUCE

MATERIAL FROM THIS DATA SHEET SHOULD BE DIRECTED TO HUNTSMAN, MANAGER, PRODUCT SAFETY, AT THE ABOVE ADDRESS.

Verified by newhodm.

Printed 1/26/2006.

EXHIBIT
IX

Date: 2/27/2006.

HUNTSMAN

Material Safety Data Sheet

Section 1. Chemical Product and Company Identification

Product name SUPRASEC® 2445 **MSDS #00008614**

Product Use Component of a Polyurethane System

Huntsman Polyurethanes (an international business unit of Huntsman International LLC.)

10003 Woodloch Forest Drive
The Woodlands, TX 77380
For Polyurethanes product information/assistance:
The Woodlands: (800) 257-5547
Auburn Hills: (800) 553-8624
Canada: (905) 678-9150

In Case of Emergency
Spills Leaks Fire or Exposure Call Chemtrec: (800) 424-9300
Medical Emergency Information: (800) 328-8501

Section 2. Composition, information on ingredients

Hazardous ingredients

	%	CAS#
4,4'-Diphenylmethane-Diisocyanate	30-60	101-68-8
Modified MDI	30-60	Not Disclosed

* Occupational Exposure Limit(s), if available, are listed in section 8

Section 3. Hazards Identification

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

Physical state and Appearance Liquid.

Emergency Overview

Reacts slowly with water to produce carbon dioxide which may rupture closed containers. This reaction accelerates at higher temperatures.
Inhalation at levels above the occupational exposure limit could cause respiratory sensitization and risk of serious damage to respiratory system. The onset of the respiratory symptoms may be delayed for several hours after exposure. A hyper-reactive response to even minimal concentrations of diisocyanates may develop in sensitized persons.

Inhalation at levels above the occupational exposure limit could cause respiratory sensitization and risk of serious damage to respiratory system. The onset of the respiratory symptoms may be delayed for several hours after exposure. A hyper-reactive response to even minimal concentrations of diisocyanates may develop in sensitized persons.

Potential Acute Health Effects

Eyes Hazardous in case of eye contact (irritant)

Skin Hazardous in case of skin contact (irritant, sensitizer)

Inhalation Hazardous in case of inhalation (irritant, lung sensitizer)

Ingestion Slightly hazardous in case of ingestion

Medical conditions aggravated by over-exposure

May cause or aggravate dermititis and asthma.

GENERAL INFORMATION

Read the entire MSDS for a more thorough evaluation of the hazards.

Section 4. First Aid Measures

Eye contact

Immediately flush eyes with running water for at least 15 minutes, keeping eyelids open. Seek immediate medical attention.

Skin Contact

Remove contaminated clothing. After contact with skin, wash immediately with plenty of warm soapy water. If symptoms develop, obtain medical attention. Contaminated clothing should be thoroughly cleaned. An MDI study has demonstrated that a polyglycol-based skin cleanser or corn oil may be more effective than soap and water.

Inhalation

Remove patient from exposure, keep warm and at rest. Obtain immediate medical attention. Treatment is symptomatic for primary irritation or bronchospasm. If breathing is labored, oxygen should be given by administered by qualified personnel. Apply artificial respiration if breathing has ceased or shows signs of failing.

Ingestion Do not induce vomiting. Provided the patient is conscious, wash out mouth with water. Obtain immediate medical attention.

Notes to physician Symptomatic and supportive therapy as needed. Following severe exposure medical follow-up should be monitored for at least 48 hours.

Section 5. Fire Fighting Measures

Auto-ignition temperature >600

Flash points Closed cup: >110°C (230°F). (Setaflash.) Open cup: 215°C (419°F).

Flammable Limits Not available.

Products of Combustion carbon monoxide, carbon dioxide, nitrogen oxides, isocyanates, HCN

Fire-fighting media and instructions SMALL FIRE: Use dry chemical powder.
LARGE FIRE: Use water spray, fog or foam. Do not use water jet.

Protective Clothing (Fire) Splash goggles. Full suit. Boots. Gloves. Self-contained breathing apparatus (SCBA) should be used to avoid inhalation of the product.

Special Remarks on Fire Hazards Reacts slowly with water to produce carbon dioxide which may rupture closed containers. This reaction accelerates at higher temperatures.

Special Remarks on Explosion Hazards Due to reaction with water producing C02-gas, a hazardous build-up of pressure could result if contaminated containers are re-sealed. Containers may burst if overheated.

Section 6. Accidental Release Measures

For major spills call Chemtrec (800-424-9300).
SEE MATERIAL SAFETY DATA SHEET Section 8. Exposure controls, personal protection

Small Spill and Leak Clean-up should only be performed by trained personnel. People dealing with major spillages should wear full protective clothing including appropriate respiratory protection. Evacuate the area. Prevent further leakage, spillage or entry into drains.

Large Spill and Leak Contain and absorb large spillages onto an inert, non-flammable adsorbent carrier (such as earth or sand). Shovel into open-top drums or plastic bags for further decontamination, if necessary. Wash the spillage area clean with liquid decontaminant. Test atmosphere for MDI. Neutralize small spillages with decontaminant. Remove and properly dispose of residues. (See Section 13 for disposal considerations.) Notify applicable government authorities if release is reportable. The CERCLA RQ for 4,4-MDI is 5,000 lbs (see CERCLA in Section 15).

Decontaminant Preparation of Decontamination Solution: Prepare a decontamination solution of 0.2-0.5% liquid detergent and 3-8% concentrated ammonium hydroxide in water (5-10% sodium carbonate may be substituted for the ammonium hydroxide). Follow the precautions on the supplier's material safety data sheets when preparing and using solution. Use of Decontamination Solution: Allow deactivated material to stand for at least 30 minutes before shoveling into drums. Do not tighten the bungs. Mixing with wet earth is also effective, but slower.

Section 7. Handling and Storage

Handling Avoid personal contact with the product or reaction mixture. Use only with adequate ventilation to ensure that the occupational exposure limit is not exceeded. The efficiency of the ventilation system must be monitored regularly because of the possibility of blockage. Avoid breathing aerosols, mists and vapors. (See Section 8--Exposure Control for details.)

Storage Keep containers properly sealed and when stored indoors, in a well ventilated area. Keep contents away from moisture. Due to reaction with water, producing CO2-gas, a hazardous build-up of pressure could result if contaminated containers are re-sealed. Do not reseal contaminated containers. Uncontaminated containers, free of moisture, may be resealed only after placing under a nitrogen blanket. Do not store in containers made of copper, copper alloys or galvanized surfaces.

Ideal storage temperature is 16-38°C (60-100°F).

Keep stocks of decontaminant (See Section 6) readily available.

Section 8. Exposure controls, personal protection

Preventive Measures Conditions of use, adequacy of engineering or other control measures, and actual exposures will dictate the need for specific protective devices at your workplace. Medical supervision of all employees who handle or come in contact with respiratory sensitizers is recommended. Persons with respiratory problems including asthmatic-type conditions, chronic bronchitis, other chronic respiratory diseases or recurrent skin eczema or skin allergies should be evaluated for their suitability of working with this product. Once a person is diagnosed as sensitized, no further exposure to the material that caused the sensitization should be permitted.

Engineering Controls Use local exhaust ventilation to maintain airborne concentrations below the TLV. Suitable respiratory equipment should be used in cases of insufficient ventilation or where operational procedures demand it. For guidance on engineering control measures refer to publications such as the ACGIH current edition of 'Industrial Ventilation, a manual of Recommended Practice.'

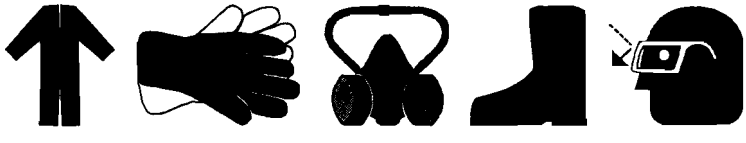
Personal Protection

Eyes Chemical safety goggles. If there is a potential for splashing, use a full face shield.

Body and Hands The following protective materials are recommended: Gloves - neoprene, nitrile rubber, butyl rubber. Thin latex disposable gloves should be avoided for repeated or long term use. Protective clothing should be selected and used in accordance with 'Guidelines for the Selection of Chemical Protective Clothing' published by ACGIH.

Respiratory When the product is sprayed or heated without adequate ventilation, an approved MSHA/NIOSH positive-pressure, supplied-air respirator may be required. Air purifying respirators equipped with organic vapor cartridges and a HEPA (P100) particulate filter may be used under certain conditions when a cartridge change-out schedule has been developed in accordance with the OSHA respiratory protection standard (29 C.F.R. 1910.134).

Protective Clothing (Pictograms)



Consult your supervisor or S.O.P. for special handling instructions.

Personal Protection in Case of a Large Spill Splash goggles. Full suit. Vapor respirator or self-contained breathing apparatus (SCBA). Boots. Gloves. Suggested protective clothing might not be adequate. Consult a specialist before handling this product.

Product Name
4,4-Diphenylmethane Diisocyanate

Exposure Limits

ACGIH TLV	0.05 mg/m3 (8-hour,40 hours/week)
OSHA PEL Ceiling Limit	0.20 mg/m3
NIOSH REL/TWA	0.05 mg/m3 (10-hour,40 hours/week)
NIOSH REL/CEILING	0.20 mg/m3 (10-minute)

Exposure controls/personal protection

Medical supervision of all employees who handle or come in contact with respiratory sensitizers is recommended. Persons with respiratory problems including asthmatic-type conditions, chronic bronchitis, other chronic respiratory diseases or recurrent skin eczema or skin allergies should be evaluated for their suitability of working with this product. Once a person is diagnosed as sensitized, no further exposure to the material that caused the sensitization should be permitted.

Section 9. Physical and Chemical Properties

Physical state and Appearance	Liquid.
Odor	slightly musty
pH	Not applicable.
Boiling/Condensation Point	>300 °C decomposes
Melting/Freezing Point	Not available.
Vapor Pressure	0.000004 mmHg
Vapor Density	8.5
Evaporation Rate	Not available.
Flash points	Closed cup: >110°C (230°F). (Setaflash.) Open cup: 215°C (419°F).

Section 10. Stability and Reactivity

Stability and reactivity

Stable at room temperature.

Conditions of Instability

Avoid high temperatures. Avoid freezing.

Incompatibility with Various Substances

This product will react with any materials containing active hydrogens such as water, alcohol, amines, bases and acids. The reaction with water is very slow under 50°C (122°F) but is accelerated at higher temperatures. Some reactions may be violent.

Hazardous Decomposition Products carbon monoxide, carbon dioxide, nitrogen oxides, isocyanates, HCN

Hazardous Polymerization Polymerization may occur at elevated temperatures in the presence of alkalies, tertiary amines and metal compounds.

Section 11. Toxicological Information

Toxicity to Animals

LD50 Rat Oral: > 5000 mg/kg
LD50 Rabbit Dermal: > 5000 mg/kg
LC50 Rat Respirable aerosol: 2240 mg/m^3 1 hours
LC50 Rat Respirable aerosol: 490 mg/m^3 4 hours

Inhalation

This product is a respiratory irritant and potential respiratory sensitizer. Repeated inhalation of vapor or aerosol at levels above the occupational exposure limit could cause respiratory sensitization. Symptoms may include irritation to the eyes, nose, throat, and lungs, possibly combined with dryness of the throat, tightness of chest and difficulty in breathing. The onset of the respiratory symptoms may be delayed for several hours after exposure. A hyper-reactive response to even minimal concentrations of MDI may develop in sensitized persons.

Skin Contact

Moderate irritant. Repeated and/or prolonged contact may cause skin sensitization. There is limited evidence from animal studies that skin contact may play a role in respiratory sensitization. These results emphasize the need for protective clothing including gloves to be worn at all times when handling these chemicals or in maintenance work.

Eye contact

The vapor, aerosol and liquid are irritant.

Ingestion

Ingestion may cause irritation of the gastrointestinal tract. Based on the acute oral LD50 this product is considered practically non-toxic by ingestion.

Carcinogenic Effects

The ingredients of this product are not classified as carcinogenic by ACGIH or IARC, not regulated as carcinogens by OSHA, and not listed as carcinogens by NTP.

Mutagenic Effects

There is no substantial evidence of mutagenic potential.

Reproductive Effects

No adverse reproductive effects are anticipated.

Teratogenic effects

No birth defects were seen in two independent animal (rat) studies. Fetotoxicity was observed at doses that were extremely toxic (including lethal) to the mother. Fetotoxicity was not observed at doses that were not maternally toxic. The doses used in these studies were maximal respirable concentrations well in excess of the defined occupational limits.

Remark

A study was conducted where groups of rats were exposed for 6 hours/day, 5 days/week for a lifetime to atmospheres of respirable polymeric MDI aerosol at concentrations of 0, 0.2, 1 or 6 mg/m3. No adverse effects were observed at 0.2 mg/m3. At the 1 mg/m3 concentration, minimal nasal and lung irritant effects were seen. Only at the top concentration (6.0 mg/m3) was there an increased incidence of a benign tumor of the lung (adenoma). One malignant pulmonary tumor (adenocarcinoma) was seen in the 6.0 mg/m3 group. MDI administration to rats in this study did not change the distribution and incidence of tumors from those seen in control animals. The increased incidence of lung tumors is associated with prolonged respiratory irritation and the concurrent accumulation of yellow material in the lung. In the absence of prolonged exposure to high concentrations leading to chronic irritation and lung damage, it is highly unlikely that tumor formation will occur. (MDI)
There are reports that chronic exposure to diisocyanates by inhalation may result in permanent decreases in lung function.

Section 12. Ecological Information

Ecotoxicity

Polymeric MDI. LC50 (Zebra Fish) > 1000 mg/l . EC50 (Daphnia magna) (24 hour) > 1000 mg/l EC50 (E. Coli) > 100 mg/l

Environmental Fate and Distribution

It is unlikely that significant environmental exposure in the air or water will arise based on consideration of the production and use of the substance.

Persistence and Degradation

Immiscible with water, but will react with water to produce inert and non-biodegradable solids.

Section 13. Disposal Considerations

Waste Information

The generation of waste should be avoided or minimized wherever possible.
Disposal should be in accordance with local, state, provincial or national regulations.
This material is not a hazardous waste under RCRA 40 CFR 261. Small quantities should be treated with a decontaminant solution (See Section 6). The treated waste is not a hazardous material under RCRA 40 CFR 261. Chemical waste, even small quantities, should never be poured down drains, sewers or waterways.
Empty containers should be decontaminated and either passed to an approved drum recycler or destroyed.

Section 14. Transport Information

Transportation Emergency Number 1-800-424-9300 (CHEMTREC).

DOT Classification Single containers less than 5,000 lbs. are not regulated. Single containers with 5,000 lbs. or more of 4,4'-Methylene Diphenyl Diisocyanate are regulated as: Other Regulated Substances, Liquid, N.O.S. (Methylene Diphenyl Diisocyanate), 9, NA3082, PGIII, RQ.

TDG Classification Not regulated.

IMO/IMDG Classification Not regulated.

ICAO/IATA Classification Not regulated.

Section 15. Regulatory Information

U.S. Federal Regulations

This material is classified as hazardous under OSHA Hazard Communication Standard (29 CFR 1910.1200).

HCS Classification Toxic
Irritating material
Sensitizing material
TSCA 8(b) inventory:All Ingredients Listed.

SARA Title III Section 313 (40 CFR Part 372): EPCRA Section 313 (40 CFR 372)
Diisocyanate Compounds (Category Code N120) 41%

EPCRA Section 313 (40 CFR 372) CERCLA (Comprehensive Environmental Response, Compensation and Liability Act): 4,4-Methylene diphenyl diisocyanate (CAS 101-68-8) has a 5,000 lb. RQ (reportable quantity). Any spill or release above the RQ must be reported to the National Response Center (800-424-8802).

This product does not contain nor is it manufactured with ozone depleting substances.

State Regulations
California Prop. 65: No ingredients listed.

Canadian Regulations

This product has been classified in accordance with the hazard criteria of the CPR (Controlled Products Regulations) and this MSDS (Material Safety Data Sheet) contains all the information required by the CPR.

WHMIS (Canada) WHMIS Class D-1A: Material causing immediate and serious toxic effects (Very toxic).
WHMIS Class D-2A: Material causing other toxic effects (Very toxic).
WHMIS Class D-2B: Material causing other toxic effects (Toxic).

CEPA DSL/NDSL:All Ingredients Listed.

Section 16. Other Information

CAUSES DAMAGE TO THE FOLLOWING ORGANS: LUNGS, RESPIRATORY TRACT, SKIN, EYES.MAY BE HARMFUL IF INHALED.MAY CAUSE RESPIRATORY TRACT, EYE AND SKIN IRRITATION.MAY CAUSE ALLERGIC RESPIRATORY AND SKIN REACTION.

Hazardous Material Information System (U.S.A.)

Health	2
Fire Hazard	1
Reactivity	1

National Fire Protection Association (U.S.A.)

Trademarks: SUPRASEC® is a registered trademark of Huntsman LLC or an affiliate thereof in one or more countries, but not all countries.

MATERIAL FROM THIS DATA SHEET SHOULD BE DIRECTED TO HUNTSMAN, MANAGER, PRODUCT SAFETY, AT THE ABOVE ADDRESS.

Verified by newhodm.
Printed 2/27/2006.

ROCKY RANDS

Rocky Shoes & Boots, Inc.
39 E. CANAL ST.
NELSONVILLE, OH 45764
PHONE: (740) 753-1951
FAX: (740) 753-4024

PURCHASE ORDER

EXHIBIT X

DATE 4/13/0

PO Number: **P040496**

Cur: US Dolla

VENDOR:

Safety-Kleen Envirosystems Co.
P O Box 382066
PITTSBURGH
PA
15250 -8066

RECEIVING:

LIFESTYLE FOOTWEAR CO.
ROAD 125, KM 3.8
PARQUE INDUSTRIAL BARRIO PUEBLO
787 877-5050
MOCA, PR 00676

Line #	Item Number - Description Color/Width - Vendor Part No.	Delivery Date	Units UOM	Price per UOM	Value
	This is amendment number 1 to order originally dated 3/24/06				
1	862 SKE-00408862 ~~2 Skids of~~ Unused, Stains, Thinner, Glues, Glycols Paints in cans	Delivery 3/30/06	3 EACH	1092.00000 Per EACH	3276.00
2	D B CUBIC YARD BOX "IF REQUIRED"	Delivery 3/30/06	2 EACH	119.00000 Per EACH	238.00
			5	US Dollar	3514.00

1. All attachements and enclosures are herein made part of the purchase order.
2. Do not overship or undership quantities and grades ordered.
3. For prompt payment our purchase order number must appear on all invoices and packages.

Authorized By: _____
SIGNATURE

RCKPO

EXHIBIT XI

Environmental Quality Board

ENIVIRONMENTAL QUALITY BOARD
P.O. BOX 11488, Santurce, Puerto Rico 00910

9-610-01 A)200091154/40138862 B 00092001/40140185
C)200086849/40132477 D)2293972/40140185

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

UNIFORM HAZARDOUS WASTE MANIFEST	1. Generator's US EPA ID No. PRR000012096	Manifest Document No. 0[illegible]3	2. Page 1 of 1	Information in the shaded areas is not required by Federal Law.

GENERATOR

3. Generator's Name and Mailing Address: CHESTEE FOOTWEAR INC
CARR 125 KM 3.8 P.O. BOX 728
MOCA PR00676

A. State Manifest Document Number:

B. State Generator's ID:

4. Generator's Phone (787 877-5050

5. Transporter 1 Company Name: SAFETY-KLEEN (MANATI) INC
6. US EPA ID Number: PRD090399718
C. State Transporter's ID: HW-02
D. Transporter's Phone: 787-854-1090

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address 000650: SAFETY-KLEEN (MANATI) INC.
KM51 HWY #2
MANATI, PR 00674
10. US EPA ID Number: PRD090399718
G. State Facility's ID:
H. Facility's Phone: 787 854-1090

11. US DOT Description (*Including Proper Shipping Name, Hazard Class, and ID Number*)	12. Containers No.	Type	13. Total Quantity	14. Unit WT/Vol	I. Waste No.
a. RQ WASTE PAINT RELATED MATERIAL 3 UN1263 PG II (D001)(ERG#127)	L.N.O.	CW	L.N.O.	P	D001 D035
b. WASTE SOLIDS CONTAINING FLAMMABLE LIQUID, N.O.S. (METHYL ETHYL KETONE, MINERAL SPIRITS)4.1 UN3175 PGII(ERG#133)	01	CW	500	P	F005 D001
c. NOT USDOT OR USEPA REGULATED MATERIAL, LIQUID (AQUEOUS STAINS)	09	CW	18,569	P	NONE
d. NON REGULATED LIQUID	L.N.O.	DM	L.N.O.	G	NONE

j. Additional Descriptions for Materials Listed Above:
A) D005 D006 D007 D008 U002 U080 U031 U112 U057 U154 UNUSED PAINT, STAINS, THINNER, GLUES
B)D035 RAGS WITH SOLVENTS
C)WASTE GLYCOL
D)LB 3477

k. Handling Codes for Wastes Listed Above:
(A) S01 T50 T81
(B) S01 T50 T81
(C) S01 T50 T81
(D)S01, T50, T81

15. Special Handling Instructions and Additional Information: MEST R/T#107227767 0009-4048-80
EMERGENCY RESP 1-800-468-1760(24 HR)IF UNDELIVERABLE RETURN TO GENERATOR.
ALT TSDF-SCD077995488 SAFETY-KLEEN 130-A FRONTAGE RD. LEXINGTON, SC 29073

24 hours Emergency response information number - Infotrac 1-(800) 468-1760 SKDOT# A: 5841 B: 32488 C: 171165 D:

16 **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practiable and that I have selected the practiable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Type Name (ON BEHALF OF)	Signature	Month	Day	Year
	[signature]	4	12	06

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
[illegible]	[signature]	4	12	[illegible]

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FA

19. Discrepancy Indication Space

ITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Month	Day	Year

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

XI

Environmental Quality Board 9-610-01

ENVIRONMENTAL QUALITY BOARD
P.O. BOX 11488, Santurce, Puerto Rico 00910
A)200091154/40138862 B)2[illegible]8972/4014

EXHIBIT XII

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

Form Approved. OMB No. 2050-0039. Expires 9-

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: PRR000012096
Manifest Document No.: 06004
2. Page 1 of 1
Information in the shaded areas is not required by Federal Law.

3. Generator's Name and Mailing Address
LIFESTYLE FOOTWEAR INC
CARR 125 KM 3.3 P.O. BOX 728
MOCA PR00676

A. State Manifest Document Number

B. State Generator's ID

4. Generator's Phone (787) 877-5050

5. Transporter 1 Company Name: SAFETY-KLEEN (MANATI) INC
6. US EPA ID Number: PRD090399718
C. State Transporter's ID: HM-02
D. Transporter's Phone: 787 854-1090

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: 000650
SAFETY-KLEEN (MANATI) INC.
KM51 HWY #2
MANATI, PR 00674
10. US EPA ID Number: PRD090399718
G. State Facility's ID
H. Facility's Phone: 787 854-1090

11. US DOT Description (*Including Proper Shipping Name, Hazard Class, and ID Number*)	12. Containers No.	Type	13. Total Quantity	14. Unit WT/Vol	I. Waste No.
a. RQ WASTE PAINT RELATED MATERIAL 9 UN1263 PG II (D001)(ERG#127)	03	CW	2100	P	D001 D035
b. NON-REGULATED LIQUID	01	DM	55	G	NONE
c.					
d.					

GENERATOR

J. Additional Descriptions for Materials Listed Above
A)D005 D006 D007 D008 U002 U080 U031 U112 U057 U154 UNUSED PAINTS, STAINS, THINNER
B)LS 3477

K. Handling Codes for Wastes Listed Above
(A) S01 T50 T81
(B) S01 T50 T81

15. Special Handling Instructions and Additional Information
MFST R/T#107230339 0009-4048-80
EMERGENCY RESP 1-800-468-1760(24 HR)IF UNDELIVERABLE RETURN TO GENERATOR.
ALT TSDF-SCD077995488 SAFETY-KLEEN 130-A FRONTAGE RD. LEXINGTON, SC 29073

24 hours Emergency response information number - Infotrac 1-(800) 468-1760 SKDOT# A: 5841 B: 23136 C: D:

16 **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practiable and that I have selected the practiable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Type Name (ON BEHALF OF)	Signature	Month	Day	Year
Eugenio Lugo Velez	Eugenio Lugo Velez	04	13	06

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

18 Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Month	Day	Year

EPA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.

IN CASE OF EMERGENCY OR SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

EXHIBIT
XIII

Contingency Plan RCRA USEPA

December 15

2006

This Hazardous Waste Contingency Plan has been developed with the purpose of establishing procedures and activities required for the prevention of, and response to, a hazardous waste releases. This plan was developed as part of Lifestyle Footwear, Inc. commitment to meet the goals and objectives of local and federal regulations.

Emergency Plan

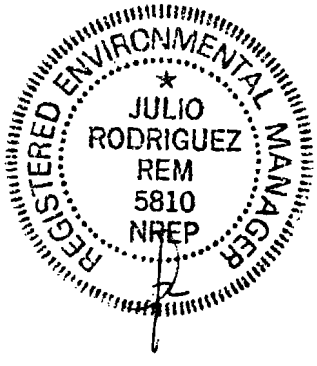


TABLE OF CONTENTS

1.0 INTRODUCTION

1.1 Purpose and Scope

This Hazardous Waste Contingency Plan (HWCP) has been developed with the purpose of establishing the procedures and activities required for the prevention of, and response to, hazardous waste releases at Lifestyle Footwear, Inc. Caribbean Operation (Lifestyle), Moca, Puerto Rico. The Plan has been designed to minimize hazards to human health and the environment from hazardous-waste-related incidents. A copy of this Plan is always maintained onsite (see Section 1.6.1 on details of how to obtain this copy) and has been submitted to all local entities/authorities that may provide emergency response services.

The HWCP was developed as part of LIFESTYLE commitment to meet the goals and objectives of 40 CFR 262 and the local Hazardous Waste Regulation of the P.R. Environmental Quality Board (EQB).

1.2 Plan Contents

A general description of the contents of the HWCP is provided below, as per each of the major sections of the document:

- Section 1.0 provides a description of the purpose and scope of the Plan, when the plan should be reviewed and updated, and the Plan certification by LIFESTYLE site management.

- Section 2.0 provides a description of the existing hazardous waste accumulation area at LIFESTYLE, including a description of the release prevention and control measures provided at each area.

- Section 3.0 provides a description of LIFESTYLE Response Management System to abate an actual hazardous waste incident.

- Section 4.0 provides a description of LIFESTYLE hazardous waste contingency procedures, including release abatement and evacuation.

Appendices A to G provide support information to the one present in the main document.

1.3 Plan Review and Update

Local/Federal regulations require that the HWCP is reviewed and immediately amended, if necessary, whenever any of the following occurs:

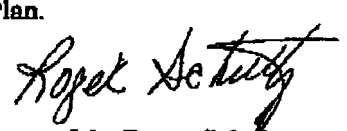
- Applicable regulations are revised;
- the plan fails in an emergency;
- the site changes in its design, construction, operation, maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents, or changes the response necessary in an emergency;
- the list of Safety Health Officers changes, or
- the list of emergency equipment changes.

LIFESTYLE will review and update its Plan whenever any of the above events occur or for a minimum of every three (3) calendar years, whichever occurs first. Minor changes that do not affect the design and intent of the Plan (such as updating the lists of Safety Health Officers, emergency response agencies/entities, and emergency response equipment) will be updated without recertification. The following is a list of Plan reviews and updates:

- Original Plan issued on November 25, 2006.
- Revision No. 1: December 6, 2006

1.4 Management Approval and Commitment

Based on the authority conferred to me by my position at LIFESTYLE and on my personal inquiry of the persons involved in the preparation of this Plan, I do hereby approve this Plan. Also, by this signature and on behalf of LIFESTYLE, I abide to follow the requirements of this Plan, including the commitment of providing and allocating the resources needed for the implementation of the Plan.

Signature:	
Name (print):	Mr. Roger Schultz
Title:	General Manager
Company:	Lifestyle Footwear, Inc.
Date:	January 10, 2007

1.5 Relationship with Other Plans

In addition to this Plan, LIFESTYLE has developed and may implement as required by the regulations and several environmental release prevention, control, and countermeasure plans, which are itemized below:

- Best Management Practices (BMP) plan to prevent releases of oil, hazardous wastes, and hazardous materials to storm water. A BMP Plan exists for LIFESTYLE's; refer to Section 1.6 for a description of the site.

- Oil Release Prevention, Control & Countermeasures (SPCC) Plan (40 CFR 112.7) LIFESTYLE's . Not applicable.

The provisions of this Plan will apply whenever a hazardous waste release occurs. The release prevention provisions of the BMP Plan are adopted herein by reference.

1.6 General Sites Information

LIFESTYLE operations at Moca are performed at one (1) site located at Moca, Puerto Rico.The site is located at Road No. 125, Km. 3.8, in Moca, Puerto Rico (see Figure 1.1). The physical address, mailing address, and telephone of the company follow:

Physical Address: P.R. Road #125, Km. 3.8
Moca, P.R.

Mailing Address: P.O. Box 728
Moca, Puerto Rico 00676

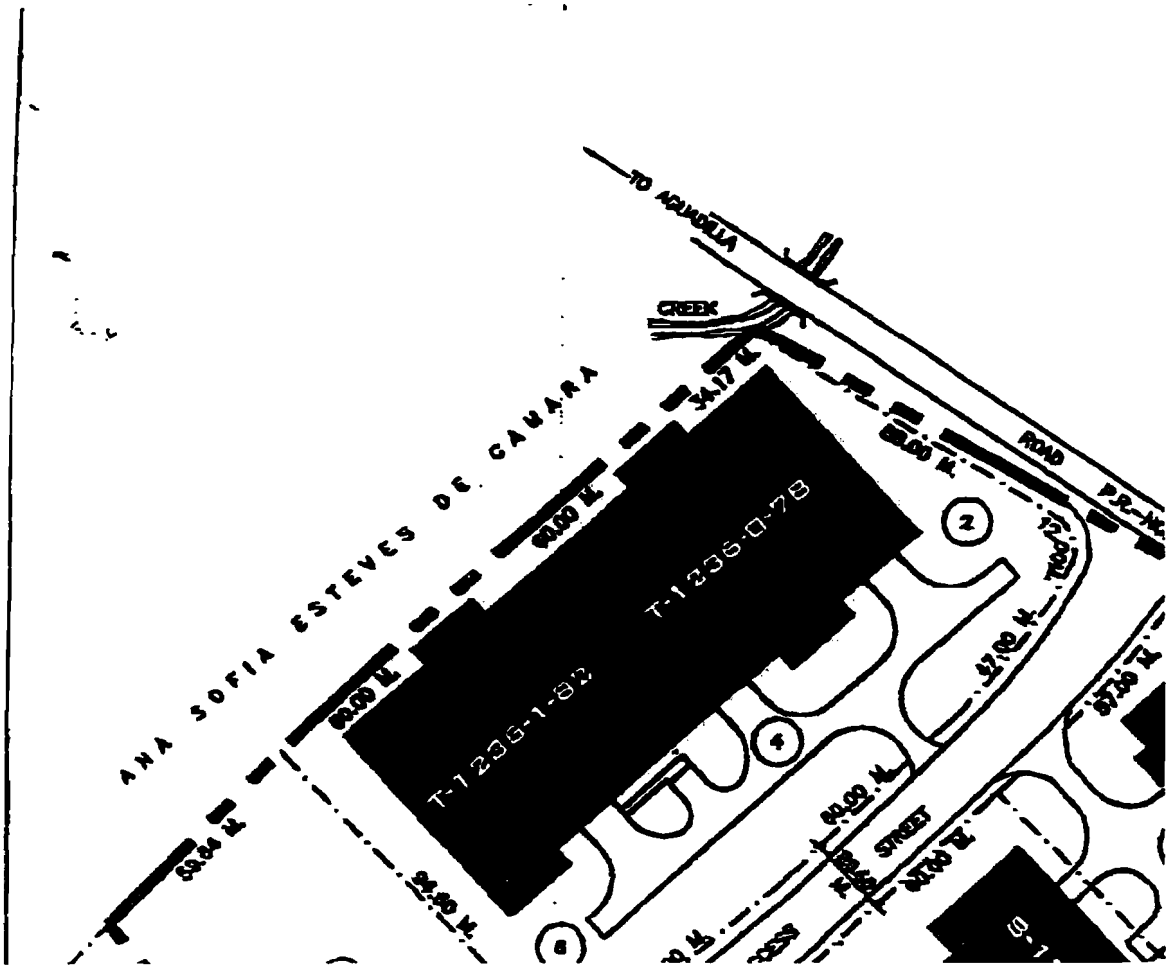
Telephone: (787) 877-5050

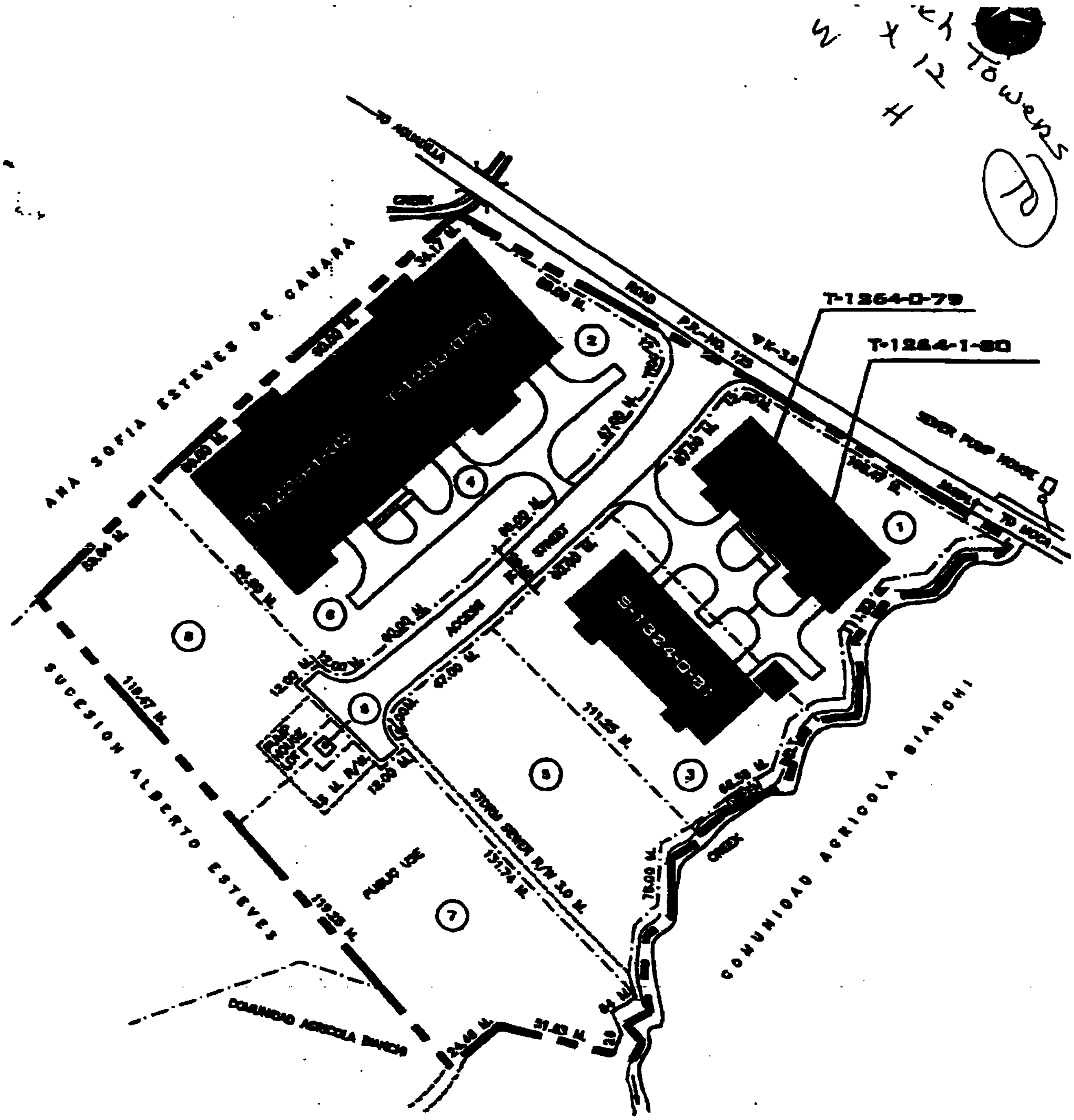
Principal activities at LIFESTYLE involve manufacturing, and packaging of footwear products. LIFESTYLE's NAICS Standard Industrial Codes (SIC) are 31621[1] (footwear manufacturing). Raw materials used in these processes generally-include basic and industrial chemicals, chemical intermediates, and solvents.

[1] NAICS 05 SIC for EPA.

FIGURE 1.1

LOCATION MAP





LOT NO.	AREA SQ. MTS.	AREA CUERDAS	BLDG. NO.	BLDG. AREA SQ. FEET	GENERAL INFORMATION
1	7,888.13	2.0394	T-1264-0-79	11,432.50	J.T. BAKER
			T-1264-1-80	11,241/25	J.T. BAKER
2/4/6	18,048.18	4.5922	T-1238-0-78	44,877.75	SENSORMATIC ELECTRONICS CORP.
			T-1238-1-82	38,581.80	SENSORMATIC ELECTRONICS CORP.
3	6,617.21	1.6836	S-1324-0-81	22,877.84	FLASH-PAK
5	7,277.81	1.8517			SENSORMATIC ELECTRONICS CORP.
7	8,677.52	2.2078			PUBLIC USE
8	6,945.0001	1.7670			SENSORMATIC ELECTRONICS CORP.
9	163.1114	0.0415			PUMP STATION

CADASTER NUMBER

The person in charge of environmental affairs at LIFESTYLE is:

Mr. Roger Schultz
General Manager – Puerto Rico Operations
Tel. (787) 846-5050

This person should be contacted with regards to the location of copies and the contents of this Plan. Mr. Schultz is also the person designated by LIFESTYLE for updating this Plan as necessary based upon site and/or operational changes.

1.6.1 Manufacturing Activities

The parent company of Lifestyle Footwear, Inc. is Rocky Shoes & Boots , Inc. ("Rocky"), which is a for profit corporation organized in accordance with the laws of the State of Delaware. Rocky has manufacturing operations in the following countries: China, Dominican Republic, and the United States.
The reasons for establishing operations in the above mentioned locations and sourcing Lifestyle's production growth at one or more of those installations are many. There is always a key reason for each location. In one location the decisive factor may be import restrictions, in another the proximity to a large developed market, and in yet another, the availability of lower cost, raw materials and/or labor. In Puerto Rico, the paramount reason is that the tax benefits, plus higher productivity of labor available, more than offset, by sufficient margin, certain growing cost disadvantages of chemical operator here. The Puerto Rico operation of Lifestyle will grow or shrink vis-a-vis its operation elsewhere depending on the magnitude of Puerto Rico's marginal after-tax advantage at the time Lifestyle must expand or reduce production.

Principal activities at LIFESTYLE involve manufacturing and packaging of footwear products. Supporting activities include solid and hazardous waste accumulation area, maintenance, safety/security, industrial hygiene, and administration. Manufactured products include military boots and accessories.

In the manufacture of its products, LIFESTYLE operations perform four (4) distinctive types of activities within the facility:

- outsole preparation
- cutting raw materials
- meeting design specifications, sewing, gluing and complying with client specifications
- packaging and shipment

1.6.2 Hazardous Waste Status

Pursuant to Lifestyle's commitment to fully comply with Subtitle C of the Resource Conservation and Recovery Act (RCRA) and associated Federal/Local regulations it has prepare this contingency plan. It is important to indicate that LIFESTYLE is a small quantity generator (SQG). Therefore, LIFESTYLE requested to the U.S. Environmental Protection Agency (EPA) an identification numbers for the site. Table 1.1 provides a description of the present hazardous waste. An amendment to RCRA SUBTITLE C site identification was sent to RCRA operational offices in Region 2.

TABLE 1.1
HAZARDOUS WASTE STATUS

Site	Plants Within Site	EPA Identification #	EPA I.D. # in the name of:	Hazardous Waste Status
Moca Plant	Lifestyle Footwear, Inc.	PRR000012096	Lifestyle Footwear, Inc.	CESQG

Wastes generated by LIFESTYLE includes: organic solvents spent at the manufacturing area, used or expired raw materials, reagents, acid/caustics, and others. Wastes are accumulated and stored at LIFESTYLE for a period not exceeding 180 days but could be stored for up to 180 days and shipped to, approved offsite hazardous waste management facility, The approved designated disposal company is Safety Kleen,Inc. in Manatí, Puerto Rico. Appendix A provides a list of the hazardous wastes generated at LIFESTYLE, including their hazardous waste classification.

1.7 Incidents Prevention Policy

Basic operational policies at LIFESTYLE are geared to emergency prevention because of their potential impact. The essential characteristics of LIFESTYLE Incidents Prevention Policy are the following:

- ❖ Plants must be maintained and operated to minimize the possibility of a fire, explosion, or any unplanned sudden or non-sudden hazardous waste release that could threaten human health or the environment.
- ❖ Use only accepted engineering practices in the design of new plant facilities.
- ❖ Provide upon requirement continuous operator training.
- ❖ Authorize valves operation only to trained personnel.
- ❖ Whenever feasible, drums and containers holding hazardous wastes shall be enclosed within fenced areas or closed buildings; all gates shall be either guarded or locked.
- ❖ Eight (8) hours, based on actual production rates, of constant monitoring by chemical operator personnel shall be provided, including areas not in operation.
- ❖ Adequate lighting shall be provided for night monitoring of plant area.
- ❖ An active Preventive Maintenance Program shall be always in place with expeditious repair of potential leak or overflow points.
- ❖ A rapid communication system shall be always available for emergency communications (via telephone, beeper system, radio, and other methods).
- ❖ Inspections should be regularly conducted at the area with release potential, and for assessing the available personnel protective equipment and the emergency response equipment.
- ❖ Whenever feasible, the area with a reasonable release potential shall be provided with adequate alert signs legible from distance. Also, the area shall be properly dike to contain releases whenever the conditions of the area allow so.
- ❖ Sand, sorbent material, and/or spill kits shall be made available in sufficient amounts at numerous portions of the site.
- ❖ All trained employees shall be active in the prevention of emergencies/releases and notify any emergency situation to his/her supervisor. Also, all trained employees shall act as "initial responders" in an emergency incident within the capabilities of each one and without compromising their safety.
- ❖ Each incident or "near-incident" is investigated by LIFESTYLE personnel. This provides LIFESTYLE valuable information of the potential/actual causes of the incident that can be used to prevent/minimize incident recurrence.

1.8 Plan Distribution

This Plan has been distributed to the following organizations:

- P.R. Environmental Quality Board (EQB) – Land Pollution Control Area
- Local and regional hospitals.
- P.R. Civil Defense (Office for the Management of Emergencies)
- Police Department
- Fire Department
- P.R. Department of Health (Regional Office)
- Local Emergency Planning Committee (LEPC)

2.0 DESCRIPTION OF HAZARDOUS WASTE ACCUMULATION AREA

This section describes the Hazardous Waste Accumulation Area (HWAA) at LIFESTYLE sites. The HWAA are considered in this Plan is one that could be subject to a reasonable potential of a significant hazardous waste release at LIFESTYLE. The HWAA is mentioned below:

- HWAA-1 - Container Accumulation Area

The HWAA is described as follows:

- General description of the area.
- Potential release causes, including a prediction of the direction, rate of flow, and total quantity of hazardous waste resulting from an equipment failure, container overflow, rupture, leak, or release.
- Specific provisions existing at the HWAA to comply with Release Prevention and Control requirements (such as containment and diversionary structures). LIFESTYLE practice regarding release prevention and control is based upon the provision of secondary containment at each of the HWAA, whenever feasible.

The location of the HWAA is provided in Figures 1.1 and 1.2. Based on the information provided by LIFESTYLE and the site physical inspection conducted by SHARE CORPORATION, there are no underground facilities for hazardous waste accumulation. For a list of the hazardous wastes that may be released at the HWAA, refer to Appendix A.

2.1 Hazardous Waste Tanks- Not applicable

2.2 Containers Accumulation Area

2.2.1 General Description

There is one area at LIFESTYLE used for temporary accumulation in containers of the hazardous wastes generated at the manufacturing process. The area is diked and provided with a manual drainage valve. The area is drained using a manual pump. Hazardous wastes containers stored in this area must have the date upon which each period of hazardous waste accumulation begin. Each container must be clearly marked and visible for inspection.

2.2.2 Release Potential Causes

One of the major causes of release at this HWAA is the physical damage to the containers located within the area. Nevertheless, this type of damage is very improbable to occur, because the containers are maintained within the diked area with gates shut. Also, there is a Containers Management Program at LIFESTYLE (see Appendix B, Page 54) for adequate management of the containers, avoiding or minimizing the possibility of releases. If a release actually happens, it will be contained within the respective area by the existing secondary containment system.

Regarding the prediction of the direction, rate of flow, and total quantity of hazardous wastes resulting from containers overflow, rupture, leak, or release, the largest release expected in the diked area is approximately 110 gallons [i.e., two (2) 55 gallon containers mounted on one (1) pallet, assuming the containers within the pallet fall down and break at the same time] during container handling operations at the respective area. This flow estimate assumes that all the volume in the containers is released within a one-hour period. The release will first overflow into the corresponding diked area and, in case of excessive storm water accumulation and/or dike failure; the material would flow directly into a nearby concrete pad/floor.

TABLE 2.1

DIKES DRAINAGE ACTIVITIES DOCUMENTATION

Container Accumulation Area	Liquid Color (should be clear)	Hazardous Wastes Present? (should not exist)	Liquid pH (should be neutral)	Containers Condition (should be absent of leaks)

NOTES:

1. This document should be filled-out every time drainage from dikes is planned.
2. Notify your supervisor any deviation to the parameters established for drainage.

Drained by:_____Date:_____

Supervisor:_____Date:_____

Comments:

_____

_____

2.2.3 Release Prevention and Control

Following are the release prevention and control features included in this HWAA:

- The area is provided of secondary containment i.e., concrete pad and diked. Secondary containment has been estimated by LIFESTYLE to be 110 gallons.
- Adequate aisle space among containers is maintained.
- Adequate containers management procedures have been instituted (see Appendix E).
- A sign alerting of the presence of hazardous wastes is available at the buildings.
- Only personnel trained in hazardous waste management is allowed to work in the area.
- Each hazardous waste container is labeled with the words "Hazardous Wastes" and a brief description of the waste contained inside the container.
- The area is inspected at least weekly.
- An alarm emergency system is in place.
- Fire protection is provided.
- Absorbent materials are readily available for release abatement.
- An immediate communication system (telephone) is provided.
- Dispensing of flammable wastes into accumulation containers is done inside the diked area.
- Adequate buffer zone for flammable storage.
- Table 2.1 provides a procedure for draining rainwater from dikes.
- Refer to Appendix E for the Release Prevention and Control programs at LIFESTYLE, which are also included in this HWAA.

Following are some special precautions to prevent accidental ignition or reaction of ignitable or reactive, or incompatible hazardous wastes (others are identified in Appendix B):

- Wastes are separated from potential ignition or reaction sources, such as open flames, sparks, smoking, radiant heat, and others. Smoking and open flame sources are confined to specially designated locations.
- "No smoking" signs are available.

- The handling of ignitable, reactive, or incompatible wastes is conducted so that it does not:
  - generate extreme heat or pressure, fire or explosion, or violent reaction;
  - produce uncontrolled toxic mists, fumes, dust, or gases in sufficient quantities to threaten human health;
  - produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion;
  - damage the structural integrity of the container for waste accumulation, or through other means threaten human health or the environment.
- A roof is provided at the area to protect the containers against moisture and sunlight.
- Special equipment (i.e., finger lifts and ramps) are provided for adequate handling of these and other containers within the area and offsite transportation vehicles.
- Hazardous waste is not placed in an unwashed container that previously held an incompatible waste or material.

2.3 Satellite Accumulation Area- Not Applicable

2.3.1 General Description

2.3.2 Release Potential Causes

One of the major causes of release in this HWAA is the physical damage to the containers located within the area. Nevertheless, this type of damage is very improbable to occur, because the HWAA area is distant from vehicles traffic (i.e., located within existing plant buildings). Also, there is a Containers Management Program at LIFESTYLE (see Appendix B, B.11) for adequate management of the containers, avoiding or minimizing the possibility of releases.

TABLE 2.2
HAZARDOUS WASTE ACCUMMULATION AREA

Site	Storage Area Location/Description
Lifestyle Footwear, Inc.	HAZARDOUS WASTE STORAGE AREA MANUFACTURING BUILDING

Regarding the prediction of the direction, rate of flow, and total quantity of hazardous wastes resulting from containers overflow, rupture, leak, or release, the largest release expected in any of this area is 110 gph [i.e., two (2) 55 gallon containers] during container handling operations at the respective storage area. This flow estimate assumes all the volume inside the container is released within a one-hour period. The release will most likely be contained within the corresponding building premises without significant effects.

2.3.3 Release Prevention and Control

Following are the release prevention and control provisions in this area:

- Adequate containers management procedures have been instituted (see Appendix B).
- When applicable, flammable cabinets are provided for storage of waste accumulation. The cabinets are vented to the outside of the corresponding building, whenever feasible.
- Signs are posted in the storage area, indicating the presence of hazardous wastes.
- Spill materials/spill kits are made readily accessible for the attention of any release in the area.
- Fire protection is provided by a water sprinkler system and fire extinguishers.
- The handling of ignitable, reactive, or incompatible wastes is conducted so that it does not:
  - generate extreme heat or pressure, fire or explosion, or violent reaction;
  - produce uncontrolled toxic mists, fumes, dust, or gases in sufficient quantities to threaten human health;
  - produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion;
  - damage the structural integrity of the container for waste accumulation, or through other means threaten human health or the environment.
- A roof is provided at the area to protect the containers against moisture and sunlight.
- Special equipment (i.e., finger lifts and ramps) is provided for adequate handling of these and other containers within the area and offsite transportation vehicles.
- Hazardous waste is not placed in any unwashed container that previously held an incompatible waste or material. Adequate containers management procedures have been instituted (see Appendix B).
- Only personnel trained in hazardous waste management is allowed to work in the area.
- Each hazardous waste container is labeled with the words "Hazardous Wastes" and a brief description of the waste inside the container.
- The storage accumulation area is inspected at least weekly.

3.0 RESPONSE MANAGEMENT SYSTEM

This section describes the existing LIFESTYLE Emergency Response Management System to abate a hazardous waste release at LIFESTYLE.

3.1 Commitment of Manpower and Equipment

LIFESTYLE will commit personnel, equipment, materials, and resources as necessary to control and remove in the most expeditious manner possible any quantity of hazardous wastes released, especially in those area in which the permanent establishment of secondary containment or other release control facilities is impractical. In addition, LIFESTYLE will contract external emergency response companies that will offer these services on an as per request basis. Refer to External Emergency Control List.

3.2 Safety Health Officers

At all times, there will be at least one (1) employee either at the site or on an on-call basis (available to respond to an emergency by reaching the plant within a short period of time) that will act as the Safety Health Officer. This Safety Health Officer- Ms. Francia Alvarado has the responsibility of coordinating all emergency response measures. Table 3.1 provides a list of Safety Health Officers and Emergency Response members. The Safety Health Officers are listed in the order in which they will assume responsibility as Safety Health Officers/alternates. In the case of an emergency, **ALL** personnel in the list will be notified. However, the first Safety Health Officer contacted and arriving to the emergency area will be the Safety Health Officer in charge of the incident.

The Safety Health Officer has the authority to compromise the resources needed to execute the emergency provisions of this Plan and has knowledge of the following:

- ❖ Emergency procedures and all aspects of the Hazardous Waste Contingency Plan (HWCP).
- ❖ Location and characteristics of the hazardous wastes handled at the plant.
- ❖ Release response procedures and emergency equipment lists.
- ❖ Emergency notification list.
- ❖ Contacts for external emergency abatement resources.
- ❖ Contractors for waste cleanup and disposal.
- ❖ Medical emergencies information.
- ❖ Facility layout.
- ❖ Location of associated records.

3.3 Emergency Response Team

Table 3.1 provides a list of the LIFESTYLE Emergency Response Team members, including a description of the role and responsibilities of each member within the team.

3.4 Arrangements with Local Authorities

The Fire Department, Police Station, and Area Hospitals, have been formally informed of our location and manufacturing facilities. Upon delivery of this plan, they are encouraged to visit our facilities to tour the plant. The purpose of this invitation is to familiarize these entities with the plant, the location and potential hazards of the hazardous wastes at LIFESTYLE, and the specific roles of each entity with regards to the site emergency response provisions.

A letter has been sent to the local authorities to obtain their commitment to provide emergency response services. The letter used for this effort is presented as Figure 3.1.

3.5 Emergency Response Equipment

The following is a list of key emergency equipment/facilities available at LIFESTYLE. This equipment is tested and maintained ready for use at all times (additional equipment details are provided in Table 3.2).

- A complete fire sprinkler system throughout the plant.
- Fire water system with adequate water volume and pressure. The system includes a fire pump for periods of power outage.
- There is a fully operational loudspeaker/intercommunication system throughout the plant and complete fire alarm systems, as required by the National Fire Protection Association.
- Hose Cabinets - All buildings are equipped with enough hose cabinets strategically located, as required by the National Fire Protection Association. Each cabinet is equipped with ax, connectors, fittings, and all the necessary parts to be used with the hoses.
- Sprinkler Systems - There is a sprinkler system protection system in LIFESTYLE manufacturing facility, and the building is protected.
- There are fully operational fire extinguishers throughout the plant, as required by the National Fire Protection Association.
- There are several spill absorbent material bags and booms in the site. For example, approximately 4 bags (about 160 lbs. each) are located at the Desma Machine and hazardous waste area and about 100 ft. of absorbent booms and spill kit.
- Personnel protective equipment includes: full-face respirators with cartridges, half-face respirators with cartridges, gloves, rubber boots, coveralls, and face hoods.
- First Aid Equipment distributed throughout the plant.
- Hydrants - There is one (1) hydrant strategically located on the outside area.

- Protective Clothing - Each member of the Fire Team has been assigned a protective coat, helmet and shield, and boots.

TABLE 3.1 - EMERGENCY RESPONSE TEAM

Name	ERT's Position	Home Address	Work Hours Phone Ext. [(787) 877-5050]	Off-Hours Phone
Francia Alvarado	Primary EC	Street #__ , Block__ Urb. _____,_____, P.R. ____		
Rafael Rodríguez	1st Alternate EC			
Américo Medina	2nd Alternate EC	-		
	3rd Alternate EC			
	4th Alternate EC			
Inés Echevarria-Arce	-			
Daniel Muñiz-Rosa	-			
José Ruíz-Varela	-	-		
	-	-		
-	-	-		
-	-	-		-
-	-	-		-
Roger Schultz	General Manager	-		-
Yarelix Rodríguez	Human Resources Professional	-		-

EMERGENCY RESPONSE TEAM LIFESTYLE FOOTWEAR

FRANCIA ALVARADO
URB. PRADERA REAL C-47
ISABELA P.R. 00662
WPHONE 787-877-5050 EXT. 229
TEL: 787-648-0270

AMERICO MEDINA
BO. ACEITUNA CARR. 464 KM. 3.3
MOCA, P.R. 006676
787-431-2242

RAFAEL RODRIGUEZ
CARR. 112 BZN 1981 CALLE ECUADOR
ISABELA P.R. 00662
787-872-0435

INES ECHEVARRIA
CARR. # 2 INT. AVNIDA LOS CORAZONES
AGUADILLA P.R. 00662
787-891-4406

DANIEL MUÑIZ
BO. CERRO GORDO CARR. 405
KM. 6.5
AÑASCO, P.R.
TEL: 787-826-0162

JESUS RUIZ VARELA
BO. TABLONAL BZN. 1763
AGUADA, P.R. 00602
TEL: 787-868-1284

ROGER SCHULTZ
BO. CEIBA BAJA CARR. 2 KM 118.5
INT. STATION C
AGUADILLA , P.R. 00605
TEL: 787-546-9672

YARELIX RODRIGUEZ
CARR. 346 KM 0.5 INT.BO JAGUITAS
HORMIGUEROS, P.R. 00660
TEL 787-463-3323

FIGURE 3.1
LETTER SENT TO LOCAL AUTHORITIES

Lifestyle Footwear, Inc.

7 de diciembre de 2006

Sr._____ [Conseguir nombre y dirección]

Comandante Policía, Área Oeste
Dirección
Mayagüez, Puerto Rico _____

Estimado Comandante:_____:

La Agencia de Protección Ambiental, (EPA, por sus siglas en inglés), bajo la autoridad de la Ley de Desperdicios Sólidos según enmendada en 1986 por la Ley de Recuperación y Conservación de Recursos (RCRA, por sus siglas en inglés), ha emitido reglamentación en torno a la generación, transportación, almacenaje, tratamiento y disposición de desperdicios peligrosos.

La facilidades de Lifestyle Footwear, Inc., ubicadas en Moca, generan algunos desperdicios designados por EPA como peligrosos según se define por la ley antes mencionada (RCRA). Lifestyle Footwear Inc., le ha notificado a EPA al respecto. En adición, nuestras facilidades han obtenido un permiso otorgado por EPA para la generación y almacenaje de los desperdicios peligrosos que son generados en la facilidad.

Como parte de los requisitos de este permiso la facilidad tiene que desarrollar y mantener en sus archivos un plan de contingencia que detalle las medidas y acciones a implementarse como respuesta a emergencias ocasionadas por algún tipo de accidente, tales como derrames de desperdicios peligrosos u otros. Dicho plan deberá estar diseñado para que los peligros y amenazas contra la salud humana y el ambiente sean reducidos en caso de que ocurra algún incidente de este tipo. Por tal motivo, la reglamentación exige que el coordinador de Emergencias Ambientales notifique a las autoridades locales pertinentes (Depto. de Policía, Depto. de Bombero, Hospitales, Defensa Civil, etc.) y les oriente sobre la información relacionada con respecto a posibles accidentes. Esta notificación es requerida con el propósito de obtener un mejor servicio de las autoridades, de ser necesario, para un buen manejo y control en la eventualidad de una emergencia que envuelva estos desperdicios peligrosos.

La reglamentación además requiere que el coordinador establezca contacto con las autoridades locales y los familiarice con las facilidades en general, las áreas donde se manejan desperdicios peligrosos, los peligros asociados y las rutas de desalojo. Le invitamos a que visiten nuestras facilidades ubicadas en la carretera 125, Km. 3.8, Parque Industrial Bo. Pueblo en Moca, Puerto Rico.

Por tanto, para su información encontrará copia del Plan de Contingencia incluyendo esquema de facilidades y rutas de desalojo establecidas.

En caso de que tenga duda a lo anteriormente expuesto o que requiera información adicional al respecto, favor de comunicarse con el que suscribe al teléfono 787-877-5050.

Atentamente,

Roger Schultz
Gerente Lifestyle Footwear, Inc
Operaciones del Caribe

j.r.q./msw/Lifestyle
c:\contingency plan.doc

Anejo: Plan de Contingencia Lifestyle Footwear Inc.

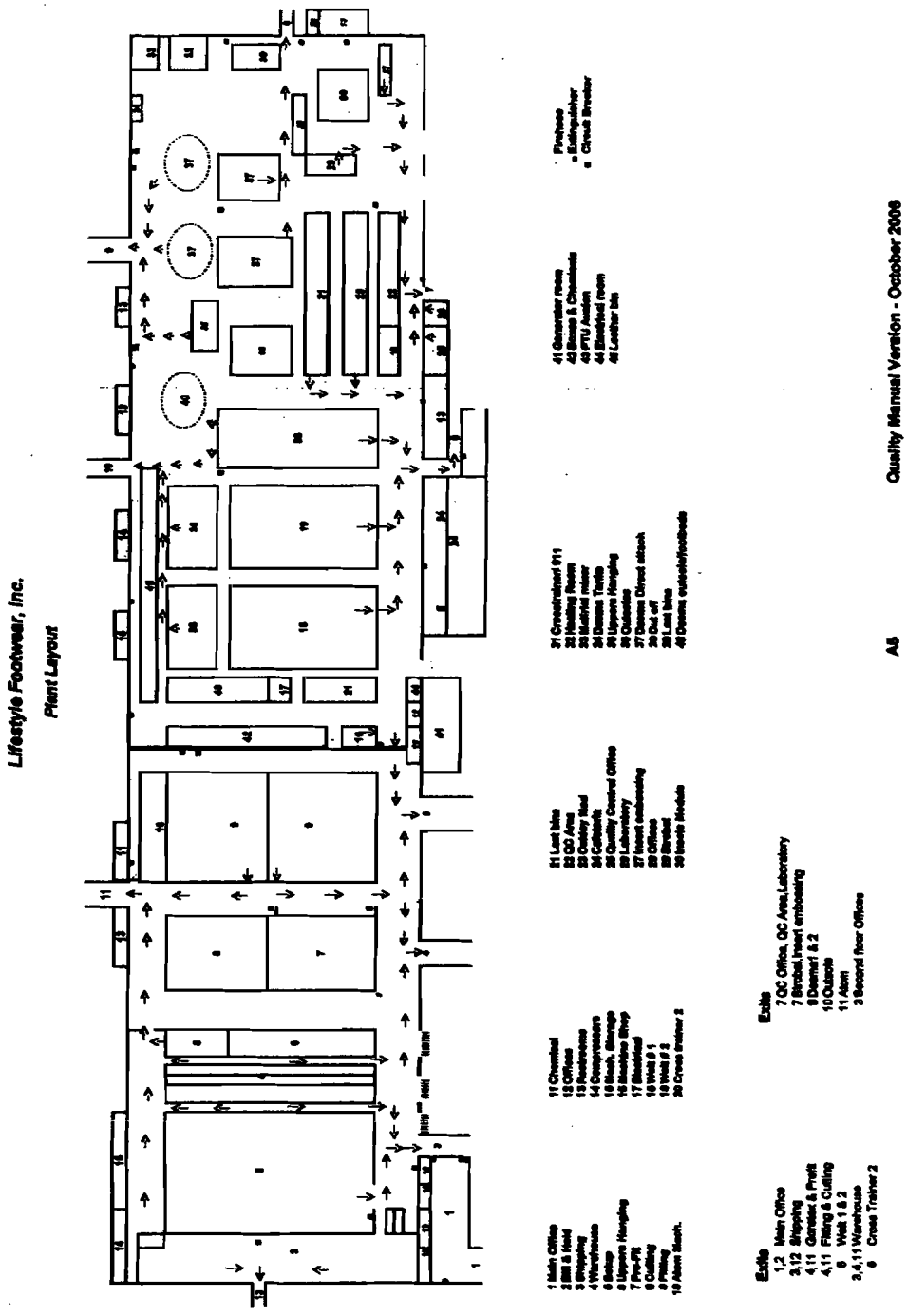
TABLE 3.2
EMERGENCY RESPONSE EQUIPMENT

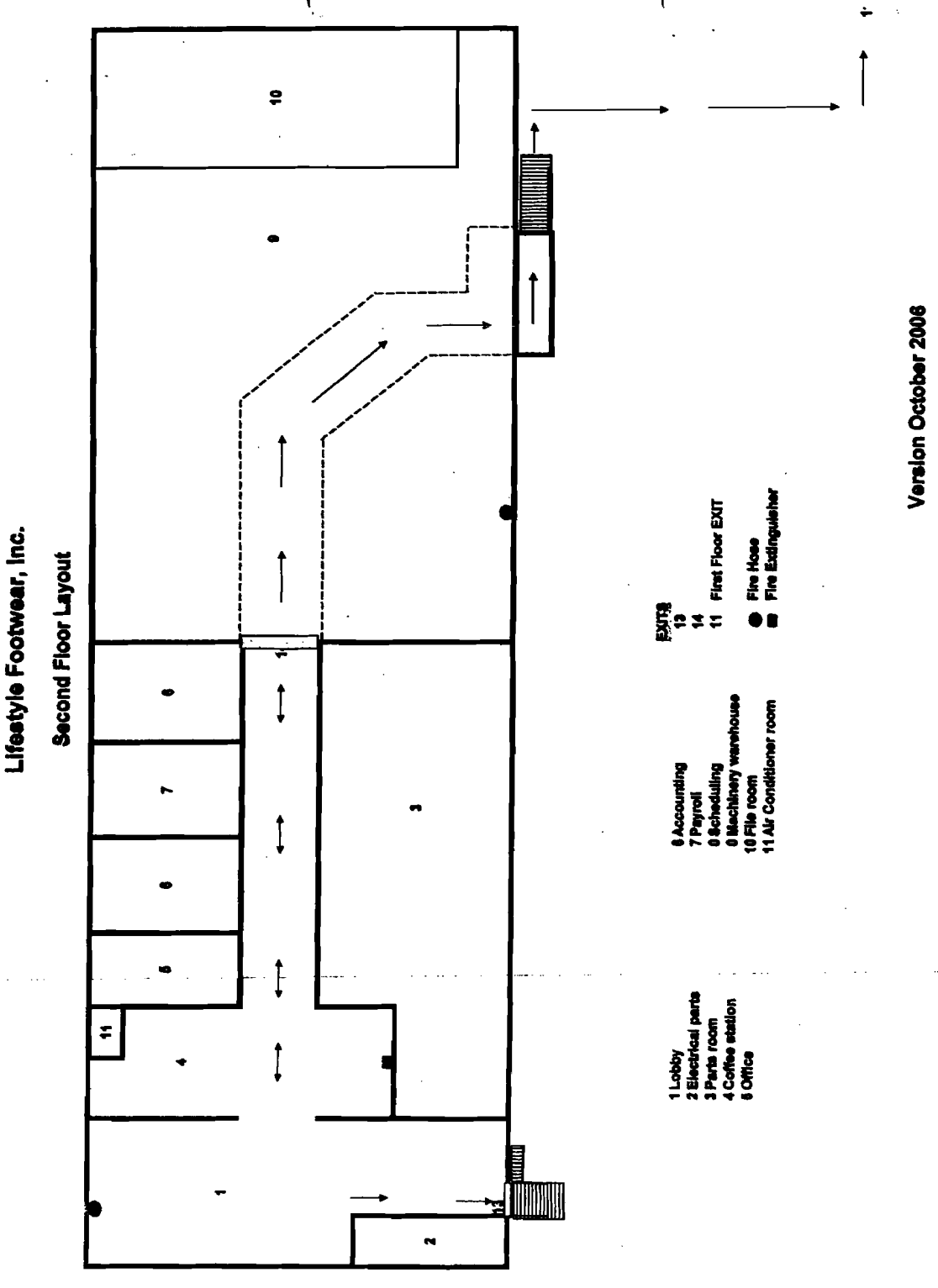
DESCRIPTION	QUANTITY	LOCATION
Shovels	2	
Squeegee	2	
Scoops	10	
Axes	1	
SCBA		
Level A Suits	0	
Level B Suits	0	
Level C Suits	15	
Saranex (Seal)	0	
Saranex (Breathable)	0	
Decon Station	1	
Full-Face Respirators	1	

- LIFESTYLE has a fully operational alarm system. This system provides a warning alarm for necessary emergency actions and reaction time for safe escape of employees from either the workplace or the immediate work area or both.

3.6 Training and Drills

Personnel involved in hazardous waste handling operations and/or emergency response is trained regarding the provisions of this HWCP. The training is an essential part of the LIFESTYLE Prevention Program (see Appendix B for a full description of the hazardous waste training program) to reduce/minimize the possibility of hazardous waste releases. Periodic drill exercises are conducted to evaluate the effectiveness of such training activities and to determine any changes to existing HWCP's procedures.


Lifestyle Footwear, Inc.
Plant Layout
Quality Manual Version - October 2006
A5


Lifestyle Footwear, Inc.
Second Floor Layout
Version October 2006
1 Lobby
2 Electrical parts
3 Parts room
4 Coffee station
5 Office
6 Accounting
7 Payroll
8 Scheduling
9 Machinery warehouse
10 File room
11 Air Conditioner room
EXITS
13
14
11 First Floor EXIT
Fire Hose
Fire Extinguisher

LIFESTYLE FOOTWEAR, INC.

Street 125 Km. 3.8 Industrial Park • Bo. Pueblo, Moca, Puerto Rico
P.O. Box 728 Moca, P.R. 00676
Tel. 787-877-5050 • Fax 787-877-2031

Fire Drill

1) Date and Time it was conducted:
   - October 31, 2006 at 1.30pm

2) Length of time it took to complete (OHSA standard is 3 minutes)
   - It took 2 minutes 56 seconds

3) What shifts were involved (if more than one shift)
   - 1st Shift and 2nd Shift (4 employees)

4) A line that states that the TBTA codes were posted at the factory
   - It was posted in the cafeteria and the main office since 09/25/2006.

4.0 CONTINGENCY PROCEDURES

Following are the LIFESTYLE Emergency Response procedures to be followed if an incident related with hazardous waste occurs. The procedures are provided as guidelines only, and may be modified by the Safety Health Officer depending on the specifics of the emergency, especially with regards to the time sequence of such procedures. Any deviations to these procedures can only be done by the Safety Health Officer- Ms. Francia Alvarado.

The procedures described hereinafter shall be carried out immediately whenever there is a fire, explosion, or release of hazardous wastes or hazardous waste constituents at LIFESTYLE that could threaten human health or the environment.

4.1 Discovery and Initial Response

- Any employee discovering a hazardous waste release should determine the source. If the source is readily obvious, the employee is responsible for providing initial response actions to stop the release, but only if these actions can be done safely without the risk of personal injury and if the actions are within the personal capabilities of the employee. These initial response actions may include items such as closing a valve, up righting a container; stop the source of release using absorbent materials, and others. The employee shall report the spill by activating the general announcing system and make the following announcement in a loud/clear voice: **"A hazardous waste spill is being reported herein at the _____ area, emergency response personnel please report at this area".**
  In addition, if the release is stopped, the employee will immediately notify his/her supervisor. If the source of the release cannot be determined or the release cannot be stopped, the following actions will be implemented by the employee as necessary (the order of the actions will depend on existing conditions and will be implemented only if employee safety is not compromised):

- Activate emergency alarms.
- Notify nearby employees to initiate evacuation of the area immediate to the release, if necessary.
- Immediately notify his/her supervisor. When notifying the release occurrence, the following information should be provided if known or can be reasonably determined without compromising the employee safety:

  1) Location of release
  2) Number of injured personnel and nature of injuries (if applicable)
  3) Waste released
  4) Amount released (estimated)
  5) Rate at which waste is currently being released (estimated)
  6) Extent to which release has traveled
  7) Any additional pertinent information (i.e., other potential hazards)

- Isolate release scene to unauthorized personnel.

- Restrict all sources of ignition when ignitable hazardous wastes or other flammable substances are involved.
- Report to the Safety Health Officer upon his/her arrival.

4.2 Sustained Actions

The following procedures are implemented immediately by the Safety Health Officer whenever there is an imminent or actual emergency situation:

- Immediately proceed to the affected area and evaluate the severity of the situation (release, fire, explosion, accident, etc.). The exact source, character, amount, and real extent of the released waste(s) must be determined, as well as the response necessary for substance containment and recovery. Information such as the one provided in the Material Safety Data Sheets of the released waste will be used for this purpose. Actualized MSDS are located at key strategic locations.
- The Safety Health Officer assesses possible hazards to human health or the environment that may result from the release, fire, or explosion. This assessment considers both direct and indirect effects of the release, fire, or explosion (e.g., the effects of any toxic, irritating, or asphyxiating gases that are generated, or the effect of any hazardous surface water run-offs from water or chemical agents used to control fire and heat-induced explosions).
- Determine the need to start or perform additional evacuation of the area. The plant must follow the Evacuation Plan developed by their respective plant and Safety Department that will be implemented whenever an emergency occurs which should require personnel evacuation. The Evacuation Plan describes the signals to be used to begin evacuation, the evacuation routes and the people responsible for safe evacuation of the different area. Evacuation routes are shown on diagrams posted nearby plant working area general evacuation routes. Site is included herein in Appendix C – diagrams posted nearby working area are not included, due to their quantity). The route nearest to the respective person will be the Primary Evacuation Route for that person. Should this route is unavailable/blocked for any reason, the person will use the second-nearest route (and so and so forth) as the Alternate Evacuation Route. All employees are trained in evacuation procedures, including routes to be followed, meeting points, and other aspects. To start evacuation of area inside the plant, the Safety Health Officer will activate the internal plant alarms and communication systems to notify the affected personnel.
- To assist in the safe and orderly emergency evacuation of employees, designated meeting points have been assigned and trained the personnel accordingly at LIFESTYLE [29 CFR 1910.38(a)(5)(i)]. The Safety Health Officer(s) will notify the meeting point Coordinator whether a portion of the plant or the entire plant must be evacuated. If evacuation is required, employees will assemble at their designated primary external Meeting Point, as indicated in the previously mentioned evacuation procedure. Each Meeting Point Coordinator has a list of the persons that should show up at the Meeting Point after evacuation. If any person is not found after a list review, he will communicate by radio or other means with the alternate Meeting point to see if the corresponding person(s) are at the point. If the person(s) is/are still missing, he/she will make the arrangements to search for the missing personnel [29 CFR

1910.38(a)(2)(iii)]. All employees are instructed to escort any visitor to the corresponding Meeting Points during evacuation.

- If the Safety Health Officer determines that the plant has had a release, fire, or explosion which could threaten human health or the environment of area outside the plant, he shall immediately notify the following local agencies: Civil Defense (Office for the Management of Emergencies), Fire Department, and Police to initiate evacuation of local area. Table 4.1 provides a list of external emergency contacts.
- Determine the need to activate the emergency response team. If so required, notify the emergency response and specifically-requested members of the emergency response team to assemble near the affected area (at a location to be designated by him). Following safety precautions activate or authorize action of appropriate members of the emergency response team to confine and control the release based on information obtained during the initial notification and immediate investigation of the reported release. The primary concern is to confine releases as close to their source as practical and if possible, prevent releases from reaching storm drains and/or to exit plant property. In accomplishing this task, the Safety Health Officer should refer to the following sources of information contained in this document:

  (1) Section 3.1 for release response equipment inventory.
  (2) Figure 1.2 to assist in the determination of probable release routes, access to the release sites, location of emergency response equipment, and location of the Hazardous Waste Accumulation Area (HWAA).
  (3) Section 2.0 for release prevention and control provisions at the HWAA.

TABLE 4.1
EXTERNAL EMERGENCY CONTACTS LIST

Agency/Entity	Telephone
National Response Center – Washington, DC	(800) 424-8802
Environmental Quality Board – Headquarters - San Juan Environmental Emergencies Office - San Juan Mayaguez Regional Office	(787) 767-8181 (787) 766-2823 (787) ____
Environmental Protection Agency - Caribbean Environmental Protection Division - San Juan	(787) 729-6951 (787) 729-6922
Environmental Protection Agency - Edison, NJ Hotline (24 hrs)	(800) 649-0394 (908) 548-8730
EPA Superfund and RCRA Hotline	(800) 424-9346
US Coast Guard Marine Safety Office (Emergency Rescue Line)	(787) 722-5500 (787) 722-2943
Fire Department - Island Wide Emergency Line Fire Department – Moca Fire Marshall	911 (787) 877-2030 (787) ____
Civil Defense – Island Wide Emergency Line Civil Defense – Moca	(787) 724-0124 (787) 877-5540
Hospitals Regional Aguadilla San Carlos San Carlos Emergency Regional Hospital – Aguadilla Ambulance Aguadilla Ambulance Aguadilla Ambulance- Aguada Ambulance - Island Wide Emergency Line	 (787) 891-3735 (787) 877-8000 (787) 877-3100 (787) 891-3735 (787)891-1805 (787) 891-1170 (787) 868-9110 911
Police Department - Island Wide Emergency Line State Police – Moca Municipal Police	911 (787) 877-0980 (787) 877-5540
Ochoa Environmental Services	(787) 788-8000 (787) 788-8888
Onyx Environmental Services	(787) 744-0070
Clean Harbors	(787) 774-0300
Caribe Hydroblasting Environmental Division	(787) 836-1110
Induchem Environmental Services, Inc.	(787) 720-6868

- The Safety Health Officer- Ms. Francia Alvarado must take appropriate safety precautions to protect response personnel and any additional personnel located in close proximity to the probable release route. In addition, the Safety Health Officer shall take all reasonable measures necessary to insure that fires, explosions, and releases do not occur, recur, or spread. These measures may include, where applicable, stopping processes and operations, collecting and containerizing released waste(s), and removing or isolating containers.
- If the site stops operations in response to a fire, explosion, or release, the Safety Health Officer must monitor for leaks, pressure buildup, gas generation, or ruptures in valves, pipes, or other equipment, wherever this is appropriate.
- The Safety Health Officer-Ms. Francia Alvardo must ensure that, in the affected area(s) of the site no waste that may be incompatible with the released waste is handled until cleanup procedures are completed. Also, all the emergency equipment utilized shall be cleaned and fit for its intended use before operations are resumed. LIFESTYLE must notify the EPA Regional Administrator and EQB that the site is in compliance with these two (2) items before resuming operations.
- The Safety Health Officer-Ms. Francia Alvarado must immediately determine the need of outside assistance to abate the emergency (Table 4.1) and proceed to request such assistance as early as possible. When notifying the release occurrence for this purpose, the following information should be provided if known or can reasonably be determined:

  1) Name and telephone number of individual reporting release
  2) Name and address of the site
  3) Location of incident and geography
  4) Number of injured personnel and nature of injuries (if applicable)
  5) Waste(s) released
  6) Type and estimated amount of released waste(s)
  7) Rate at which waste(s) is currently releasing (estimated)
  8) Time release occurred (estimated)
  9) Extent which release has traveled
  10) Safety Health Officer name and telephone number
  11) Magnitude and severity of the threat to public health, welfare and natural resources
  12) Weather conditions at release site
  13) Cause of incident
  14) Anticipated containment and clean-up action and effectiveness.
  15) Specific needs for assistance
  16) Any additional pertinent information (i.e., other potential hazards)

- The Safety Health Officer- Ms. Francia Alvarado must also notify the situation to LIFESTYLE CORPORATE OFFICE, as required, based upon Company procedures.

- The Safety Health Officer- Ms. Francia Alvarado shall initiate physical response and clean-up actions. Such measures may include, but may not be limited to, the following:

1. Unconfined releases - provide release confinement using existing physical systems (such as closing dike valves), absorbent materials, earth beams, trenches, or other methods. Collect the released material to the maximum extent possible using shovels, pumps, vacuum trucks, or other equipment. Table 4.2 provides additional guidance for unconfined releases.
2. Confined releases - the Safety Health Officer-Ms. Francia Alvarado must ensure that the containment is sound for waste recovery and, if not, institute the necessary actions (such as tightening valves and providing additional absorbent material). Also, it is important that, in the case of an ignitable hazardous waste, to ascertain that all ignition sources are isolated from the area. Releases contained in a dike at containers storage area can be recovered by draining out the water (if any), and transferring back the material to the other container. Unrecoverable and/or dirty released waste can be accumulated into containers until it is shipped out for ultimate disposal at an approved offsite hazardous waste management facility.
3. Recovered released waste, absorbents, and similar material shall be placed in containers, labeled, and accumulated temporarily if necessary for reuse/recycling or until eventual waste characterization for offsite disposal in accordance with RCRA and DOT regulations. The Chemical Hazards Response Information System (CHRIS) Hazardous Chemical Data Sheets, Material Safety Data Sheets (MSDS), and similar information should be consulted with regard to special handling procedures and precautions. Actualized MSDS are located at key strategic locations, such as the Safety and Health Office, and working areas.
4. If advisable, the Safety Health Officer will secure and coordinate necessary assistance for containment and/or special treatment of the released material. And the activity should not compromise compliance with LIFESTYLE permitted operations.
5. After release cleanup actions are completed, direct personnel from LIFESTYLE personnel or external contractors to collect environmental samples to determine the chemical nature, released materials concentration, and extent of the release if required for response actions and documentation. The Safety Health Officer shall use this, and any other available information, to assess any measures required to mitigate any persisting impact to the environment, once health and welfare of humans have been safeguarded.

TABLE 4.2
GUIDELINES FOR EMERGENCY ACTIONS FOR UNCONFINED RELEASES

These guidelines are based upon the general methods instituted by 33 CFR 153.305 (Methods and Procedures for Removal of Oil Discharges). The procedures are offered only as guide. The Safety Health Officer- Ms. should evaluate every release incident and lead the response operations using his best judgment.

Utilize at maximum all mechanical methods and absorbent materials that can minimize secondary contamination from the removal operations.
Control the release source, prevent additional releases, and interrupt or reduce the release by manual and/or mechanical methods or with absorbents.
Recover at maximum the substance discharge to the water using manual and/or mechanical methods.
Use chemical agents only when and as instructed by the Safety Health Officer.
Reuse or dispose of collected substances and contaminated material in accordance with the applicable local and federal regulations.
To contain small releases, methods such as dikes, absorbent bags, haybales, or sand bags/mounds may be used. This equipment must be available 24 hours a day at strategic points of the site. Larger releases may require the use of heavy equipment, such as bulldozers or excavators. This equipment is typically utilized to intercept the flow of released substance (by digging a hole or trench). Also, heavy equipment can be utilized to construct earthen berms to retain the release.

- After release is contained effectively and the emergency is controlled, the Safety Health Officer-Ms. Francia Alvarado must provide for offsite treatment, storage, or disposal of recovered waste, contaminated soil or surface water, or any other material that results from a release, fire, or explosion at the site. For performing such task, the Safety Health Officer will first classify all waste resulting from the incident among hazardous and non-hazardous wastes, respectively. The Safety Health Officer- Ms. Francia Alvardo must make arrangements for laboratory analysis of the wastes, if so needed for waste classification purposes. Then, the Safety Health Officer shall make the necessary steps for proper packaging and containerization of the waste, in accordance with the U.S. Department of Transportation (DOT), EPA, and EQB regulations. After the material is classified and packed properly, the Safety Health Officer or his designee must make arrangements for transportation and offsite disposal of the wastes, in accordance with applicable regulations. All waste shipments to offsite facilities shall be properly documented by the use of manifests, Bills of Lading, and any other shipping papers required by prevailing regulations.
- The Safety Health Officer shall determine if the emergency needs to be immediately reported by regulation and proceed immediately with this reporting, as needed. Appendix D provides a guideline for such initial reporting.

The Safety Health Officer or his alternate will maintain an Incident Log detailing all actions taken during the course of the release response activities. The log will include items such as a description of the incident, causes; waste released; the actions taken to abate the incident; any details on incident reporting to the agencies, actions to prevent incident recurrence, and any additional significant information.

4.3 Termination and Follow-up Actions

LIFESTYLE has not experienced yet any hazardous waste releases to be considered as reportable under Federal and Local regulations. If an event of such nature occurs, the release will be documented as explained in Appendix E and submitted to pertinent regulatory agencies. This report(s) will be maintained in the LIFESTYLE file in accordance with LIFESTYLE Corporate requirements.

Also, an objective critique of the emergency response procedures will be performed by LIFESTYLE, as stated in Appendix F.

APPENDIX A
HAZARDOUS WASTES GENERATED AT LIFESTYLE

Appendix A

HAZARDOUS WASTE CODES & DESCRIPTIONS

USEPA CODES	ADDITIONAL DESCRIPTION	USDOT CODES	CONTAINER TYPE	UNIT WT./VOL.	DESCRIPTION
F005 **F003**	D001 D035	UN1993	DM	G	TOLUENE 54% ALIPH HYDR. 20% ACETONE 9% MEK 7%
U220	D001	UN1294	DM	G	TOLUENE 90% BUTYL ACET. 3%
F005 **F003**	PLAST. MATL. W SOLIDS	UN3175	DM	P	ACETONE 20% PET.NAPHTHA
F005 **F003**	D001 D035	UN3175	DM	G	OIL BASED GLUE 10% MEK 10%
	D002	UN1791	DM	G	SODIUM HYPOCHLORITE SOLUTION 1% WATER 99%

APPENDIX B
PREVENTION PROGRAMS

PREVENTION PROGRAMS

This appendix presents and discusses the programs available at LIFESTYLE to avoid or minimize the occurrence of hazardous waste releases. For specific provisions regarding release prevention at each of the HWAA of the plant, the reader is referred to Section 2.0. For provisions regarding the abatement of an actual release of hazardous wastes, the reader is referred to Section 4.0 of the HWCP.

B.1 Maintenance Program

The LIFESTYLE Maintenance Program includes both unscheduled and preventive maintenance activities. Unscheduled activities consist of any work requested to the Maintenance Department in the eventuality of the failure or breakage of specific equipment or facilities. These activities include, but are not limited to, correct leakage of pump seals and repairing piping, and other equipment. Visible leaks that result in a loss of hazardous wastes are promptly corrected.

Preventive Maintenance (PM) activities include regular activities, such as lubrication, periodic cleaning, and the testing of equipment and valves. These activities will help in determining upfront the need of replacement or repair, minimizing the potential for a release.

LIFESTYLE regularly and properly maintains equipment and systems installed on heat-producing equipment to prevent accidental ignition of combustible materials [29 CFR 1910.38(b) (5)]. The following procedures are followed:

- ❖ Isolate all combustibles/flammable substances from the heat source, as possible.
- ❖ Use only spark-free tools when dealing with equipment servicing.
- ❖ Ensure that all temperature indicators are in working order.
- ❖ Monitor periodically the atmosphere for flammable gases during equipment servicing.
- ❖ Avoid welding operations, if possible.

LIFESTYLE PM- (Mr. Americo Medina-Supervisor) includes routine inspection and testing of plant equipment and control systems to identify conditions which could cause breakdowns or failures resulting in significant discharges. As part of the preventive maintenance program there are: identification of equipment or systems to which the PM program must apply; periodic inspections or tests of identified equipment and systems; appropriate adjustment, repair, or replacement of parts and/or equipment, when needed; and maintenance of complete PM records on the applicable equipment and systems.

Some of the equipment to be inspected and/or tested is the following:

- ❖ Safety release valves

The type and the frequency of inspection depend on the manufacturer recommendations, the experience of the equipment, the nature of the equipment and the kind of hazardous waste the equipment handles. The records of the inspection are kept in the Maintenance Department and/or the department owner of the equipment.

All facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, are tested and maintained as necessary to assure its proper operation in time of emergency.

B.2 Corrosion Protection Program- Not applicable

B.3 Release Detection and Integrity Testing Program- Not applicable

B.4 Site Inspection Program

The Inspection Program is one of the most important programs of LIFESTYLE to assure that the objectives of the HWCP are attained. By this program, anomalies in any of the HWAA are identified in advance and actions immediately taken to avoid or minimize the occurrence of a release. Items such as equipment condition, whether a container is closed or a pipe is leaking, etc., are crucial aspects of this inspection program.

As an example, the visual inspection of the hazardous waste accumulation area includes the following components:

- Dikes and visible structural members
- connections
- valves and fittings

As another example, LIFESTYLE performs at least a weekly inspection of the Hazardous Waste Container Accumulation Area in accordance with the HWR. This inspection is very detailed in order to comply with the requirements of RCRA Subtitle C for release prevention. Items such as containers condition, compatibility, the use of secondary containment, whether the containers are kept within the area, and other release prevention issues are assessed during the inspection.

Table B-1 provides the inspection form used to inspect the hazardous waste accumulation area.

Also, LIFESTYLE has a written schedule of inspection for key equipment that is important to prevent, detect, or respond to environmental or human health hazards. This includes safety and emergency equipment, security devices, and structural equipment such as dikes and containers. Table B-2 provides such schedule, including inspection frequency and the items to be checked during the inspection.

Records of each inspection made are maintained in pre-designed forms used for this purpose. These records are maintained for a three (3) years period.

TABLE B-1
HAZARDOUS WASTE ACCUMULATION AREA INSPECTION LOG

Week of: _____ Inspected by: _____

Items to be Inspected	Observations/Comments (indicate deficiencies and corrective actions)
Signs are posted with the following information/wording: site name, maximum containers capacity, "No Smoking", "Authorized Personnel Only", "Keep Out", emergency contacts with telephone, hours of area operation, identification of hazards, "Hazardous Waste Storage Area"	
Fire extinguishers are in place and inspected for adequate operation (check extinguisher inspection tag)	
Containers are placed over pallets and stacked no more than two (2) rows high	
Adequate entry space and adequate aisle space among containers maintained	
Each container is labeled or marked by the waste name and the waste accumulation start date (month should be in words)	
Ignitables are located at more than 50 ft. from property line.	
All containers are placed within the designated accumulation area. Segregation of incompatibles is provided by distance or dikes/berms	
All containers are in good condition, free of ruptures, corrosion, or leaks	
All containers are closed	
The area is free from releases evidence	
The floor and dike walls are structurally integral with no cracks observed; the concrete coating is on good condition	

NOTE: Immediate action shall be taken if any of the above is found to be deficient.

TABLE B-2

WRITTEN INSPECTION SCHEDULE FOR CRITICAL EMERGENCY EQUIPMENT

❖ (This equipment list should be revised as per scheduled as a minimum.)

Equipment	Items to be Checked	Frequency (minimum)
Alarms	Check if the alarm can be started and stopped properly, condition of wiring and instruments, etc.	Once every 90 days.
Dikes/secondary containment	See Table B-1.	See Table B-1.
Manual sump pumps	Check if the pump starts and stops properly, if it pumps adequately the liquid, condition of wires, instruments, and hoses, etc.	Once per month (can be done during dikes drainage).
Spill kits/cabinets	Check if enough equipment is available at each unit and if the kit/cabinet and associated materials are in good condition	Once per month.
Telephone/paging system	Check if all critical emergency contacts (internal/external) can be called through the system	Once every 90 days.
Two-way radios system	Check if all critical emergency contacts (internal/external) can be called through the system	Once every week. Four units.

B.5 Security Program

The LIFESTYLE security system consists of an organized guard force, which operates 24 hours per day, seven (7) days per week. The guards regularly patrol the property. The property has controlled access, and the perimeter of the property is fenced. All visitors, employees, vendors, etc., must pass through the guard area before entering the plant. The HWAAs are identified with appropriate warning signs. The area is well illuminated at night. The following are other features of LIFESTYLE security program:

- Fencing and Gates - The site is fenced and gates are locked or guarded at all times. Guards are on duty around the clock, seven days a week.
- Drain Valves - All drain valves are securely locked when not in use for extended periods.
- Communications - Telephone system with phones in most plant area and a public address (paging) system. The same telephone system is used for communication outside the plant.
- Identification - Employees are required to use identification cards. A system is available to register employee entrance and prevent unauthorized personnel entrance. Visitors are required to be accompanied by authorized personnel, and must sign a visitor log sheet and obtain temporary passes and restricted access cards from the security guards.

B.6 Personnel Training Program

As described earlier, there are hazards (both physical and chemical) at LIFESTYLE. There are also prevention and control programs and response systems in place to deal with those hazards. LIFESTYLE employees must be made aware of and understand these hazards and programs/response systems in order to prevent incidents to happen whenever possible, to respond effectively when incidents cannot be prevented, as well as to protect themselves from the particular hazards of the emergency.

LIFESTYLE Training Program has been designed to educate site personnel taking into consideration the expected involvement of each employee with regard to the prevention and control of incidents. Three (3) training levels have been developed, based upon the particular skills, capabilities, and involvement of the respective employees. These levels are:

- Level 1: General Awareness Training
- Level 2: Hazardous Wastes Handling Training
- Level 3: Emergency Response Team Training

A general description of LIFESTYLE Training Program is provided below. For further details of the Program, the reader shall consult the training manuals and other Training Program descriptive documents at LIFESTYLE Safety Office.

Training logs providing evidence of site training activities are maintained at the Safety Office.

B.6.1 Level 1: General Awareness Training

The General Awareness training is intended toward the employees that are not directly involved in the handling of hazardous wastes, but that can be affected by an incident and/or will be act as "initial responders" in an emergency. Items covered in the General Awareness Training include the following:

- General description of the hazardous wastes handled at the plant (with regards to location and a brief description of associated hazards).
- General description of site manufacturing activities, environmental, health, and safety program, and prevention/control measures.
- Brief description of the HWCP and of where to obtain a copy of the Plan.
- The responsibilities of each employee to work safely and of preserving the environment.
- How to act as "initial responders" during an emergency, especially in notifying any incident to the supervisor and emergency response personnel.
- Area of the plant that they should avoid entering or that they should be escorted.
- Evacuation procedures and corresponding meeting points.
- Key contacts at LIFESTYLE should answer any questions that could arise.

New hires are required to attend this training before starting to work at the plant or shortly thereafter. Retraining is required every one (1) year.

B.6.2 Level 2: Hazardous Wastes Handling Training

All personnel involved in the handling of hazardous wastes receive training on the release prevention and control requirements of this Plan. This training includes information specific to LIFESTYLE, including the implementation of the countermeasure provisions of this Plan. New personnel receive this training within 30 days after hiring. In the same manner, personnel transferred from other functions to responsibilities involving the handling of hazardous wastes will receive the training within 30 days after the transfer. All relevant employees will be retrained annually. Training records are reviewed every three (3) months to assure that this practice is maintained.

The training is conducted in accordance with a prewritten Training Plan, which addresses both classroom and on-the-job training. The training on HWCP's issues is incorporated into existing environmental and safety training sections and is conducted by personnel of the LIFESTYLE or external sources. These personnel are properly qualified in the provisions of this HWCP and hazardous waste management requirements. The hazardous waste training program includes the

following key features and topics:

A) Hazardous Waste Regulatory Requirements

- ❖ Waste identification and classification (definition of solid waste, listed/characteristic hazardous wastes, mixture/derived-from rules).
- ❖ Adequate waste handling procedures
- ❖ Container management standards (adequate containers, labeling/marking, handling of empty drums, etc.)
- ❖ Allowable accumulation time
- ❖ Hazardous waste generation log
- ❖ Manifest procedures
- ❖ RCRA's Preparedness/Prevention requirements
- ❖ Use approved transporters and offsite hazardous waste management facilities

B) Release Prevention and Control

- ❖ Laws and regulations
- ❖ Background and purpose
- ❖ HWCP's objectives and applicability
- ❖ Specific release prevention and control procedures
- ❖ Drills
- ❖ Handling of release residues

C) Occupational Safety

- ❖ Personnel protection and safety
- ❖ General precautions for handling hazardous wastes.
- ❖ Health effects
- ❖ Specific safety precautions during emergency incidents
- ❖ Health effects of exposure to hazardous wastes
- ❖ Applicable first aid procedures to be used following exposure
- ❖ Evacuation procedures
- ❖ Personnel Protective Equipment and procedures for using such equipment

D) Handling of Hazardous Wastes in Work Area

- ❖ Facilities operation and maintenance
- ❖ Operational procedures
- ❖ Material Safety Data Sheets (MSDS)
- ❖ Truck loading operations
- ❖ Records management

E) Other Important Aspects (as applicable)

- ❖ Flammability/combustibility of some released materials and potential for flashback along vapor trails
- ❖ Applicable fire fighting procedures and special hazards of combustion products
- ❖ Reactivity of released material with common materials (including water)
- ❖ Use and maintenance of all alarms and monitoring equipment associated with release prevention or response
- ❖ Initial notification procedures described in the HWCP
- ❖ Location of posted copies of the HWCP and Material Safety Data Sheets
- ❖ Immediate release response actions including the location of pump controls and valves to stop release flows, and the location and use of fire extinguisher, sorbents, neutralizing agents, and other immediate release response procedures, as appropriate
- ❖ The multiple aspects of visual inspections associated with the particular work area
- ❖ Good housekeeping

Training sections are conducted periodically for all personnel working with hazardous wastes, especially after any significant revisions to the training program or the HWCP, and after an emergency response in which training deficiencies are noted. Records of the type, extent and frequency of each employee's training will be maintained.

Although contractors working in area associated with hazardous wastes are responsible for training their personnel in release response and reporting procedures, they are debriefed in the provisions of this HWCP before they start to work at the plant.

B.6.3 Level 3: Emergency Response Team Training

All personnel designated in this Plan as part of the Emergency Brigade must take part in emergency response training programs. Retraining of the team is done annually. The training involves both general (i.e., Levels 1 and 2 training - see Sections E-1 and E-2), as well as detailed training on emergency response. The detailed training addresses the following:

- ❖ The responsibilities of the individuals being trained.
- ❖ The detailed response procedures to be followed in the event of a release.
- ❖ The location and use of release response equipment.
- ❖ The potential hazards associated with release response activities.
- ❖ Release response exercises (conducted periodically). Response to an actual release will satisfy the requirement for release response exercises. New brigade members are provided of an HWCP's copy and briefed upon assignment to the team.

All employees that form part of the Emergency Response Team must have taken the OSHA 40-hours Hazardous Waste & Emergency Response (HAZWOPER) training. Annual 8-hour HAZWOPER refreshers are also a requisite to these employees.

B.7 Contractors Management Program

LIFESTYLE recognizes that improper contractor activities may lead to the generation of releases. Therefore, LIFESTYLE instructs the contractors about the provisions of this HWCP, its relationship with the contractor activities to be done, and the responsibilities of the contractor to follow the procedures stated in the Plan and of reporting LIFESTYLE Management any incident which may require activation of the emergency response provisions of the Plan. Contractor is debriefed about the provisions of this HWCP prior to starting work at the site. Also, LIFESTYLE oversees contractor activities during their execution to assure conformance with the Plan. This is particularly important for contractors dealing with the preparation of lab packs for the hazardous wastes generated at the LIFESTYLE analytical laboratories and the companies offering hazardous waste transportation services to LIFESTYLE.

B.8 Facility Drainage

LIFESTYLE drainage system has been designed to minimize the possibility that hazardous wastes gain access to nearby "navigable waters" in the eventuality of equipment failure and/or human error. The intent of this HWCP is that all the HWAA are provided of secondary containment to retain releases. Specific provisions regarding drainage and release control at each of the HWAA are detailed in Section 2.0.

B.9 Facility Wastewater Discharges-Not applicable

B.10 Piping Program- Not applicable

B.11 Containers Management Program

The containers management program of LIFESTYLE for hazardous wastes has the following important key elements, in accordance with 49 CFR 172:

- If a container is not in good condition, or if it begins to leak, contents are transferred to a sound container or the container is overpacked.
- Containers are not opened, handled, or accumulated in a manner which may rupture the container or cause it to leak.
- All containers are to be maintained closed, except when filling or emptying.
- Only containers that are compatible with the contained substance are utilized.
- Incompatible substances are not placed within the same container.
- Containers of 55 gallons (or larger) size are to be always put over pallets and stacked neatly [no more than two (2) container stories are allowed].
- At a minimum, containers are to be placed at a paved and leveled area, and with a considerable distance from storm drains when no means of secondary containment is possible.
- Only DOT/United Nations (UN) - approved and in good condition containers are used for offsite shipments of hazardous wastes.
- Empty containers handling is closely supervised by LIFESTYLE by the hazardous waste area person- Mr. Rafael Rodriguez.
- Segregation of container holding incompatibles is provided by means of dikes or by a suitable distance.
- Adequate aisle space is maintained among parallel container rows.
- Containers holding ignitable or reactive are placed at more than 50 ft. from property line.

In addition to the above mentioned items, containers accumulating organic-type hazardous wastes are subject to special container management practices regarding prevention and control of volatile air emissions:

- Each container opening is maintained in a closed, sealed position (i.e., covered with a gasketed lid) at all times that the waste is in the container except when it is necessary to have the opening open during procedures to add, remove, inspect, or sample the waste in the container.
- Containers-transferring operations at the accumulation area are avoided, whenever possible. Preference is given to provide a DOT-approved overpack (rather than repackaging to a new container) when an organic waste container is rusted or damaged. If transferring becomes necessary, it is done in such a manner as to minimize waste exposure and volatilization to the atmosphere to the extent practical, considering good engineering and safety practices for handling hazardous materials. Examples of these methods include transferring waste through a conveyance tube that is fitted to the container opening above the liquid level to splash-fill

the material, and subsequently purging the conveyance tube with an inert gas (such as nitrogen) prior to removing it from the container opening.

B.12 Lighting

All operational area of the plant are sufficiently lighted to meet Occupational Health and Safety Act standards, allow detection of releases, and to discourage vandalism. In an emergency situation (such as a power shortage), all critical operational power demands necessary to maintain operation or to bring operation down safely is provided by Electricity Generator Units.

B.13 Inventory Control Program

LIFESTYLE has established an inventory control program in which the approximate amounts of substances handled at the plant are known at all times. An adequate inventory of substances is maintained that can supply company needs for the present and for immediate future. However, an excess inventory is avoided, recognizing that the larger the quantity of substances present, the higher the risks of releases at a particular site.

B.14 Fire Prevention and Protection Program [29 CFR 1910.38(b)(2)]

The LIFESTYLE Fire Prevention and Protection Program is also oriented toward the HWAA mentioned in Section 2.0. This area is within the ones posing the largest fire hazards at the site. The HWAA description in Section 2.0 includes proper handling and storage procedures instituted at LIFESTYLE, which also will help to avoid or minimize the occurrence of fires. Control procedures regarding fire control at the HWAAs include the prohibition of welding, smoking, and other potential ignition sources that can create a fire within each area.

Following are key elements of LIFESTYLE fire prevention and protection program:

- ❖ Employees are trained in how to respond to a fire, notifying the LIFESTYLE Safety Health Officer of any fire incident and how to avoid or minimize the occurrence of fires.
- ❖ An adequate storage of fire water exists at the plant, which is readily available for use at all times. This system is served by an oil-driven fire pump and is activated either automatically or manually. The fire water system supplies numerous fire sprinklers and hoses distributed throughout the plant. The system is supplemented by portable fire extinguishers.
- ❖ Personnel are available at the plant to combat fires in both incipient and structural stages, which is backed-up by the local municipal Fire Department.

B.15 Housekeeping Program

Employees at LIFESTYLE are instructed in adequate housekeeping procedures. As part of LIFESTYLE training, a section is offered to LIFESTYLE employees and contractors on good housekeeping practices in operational and plant area (where the potential exists for spills

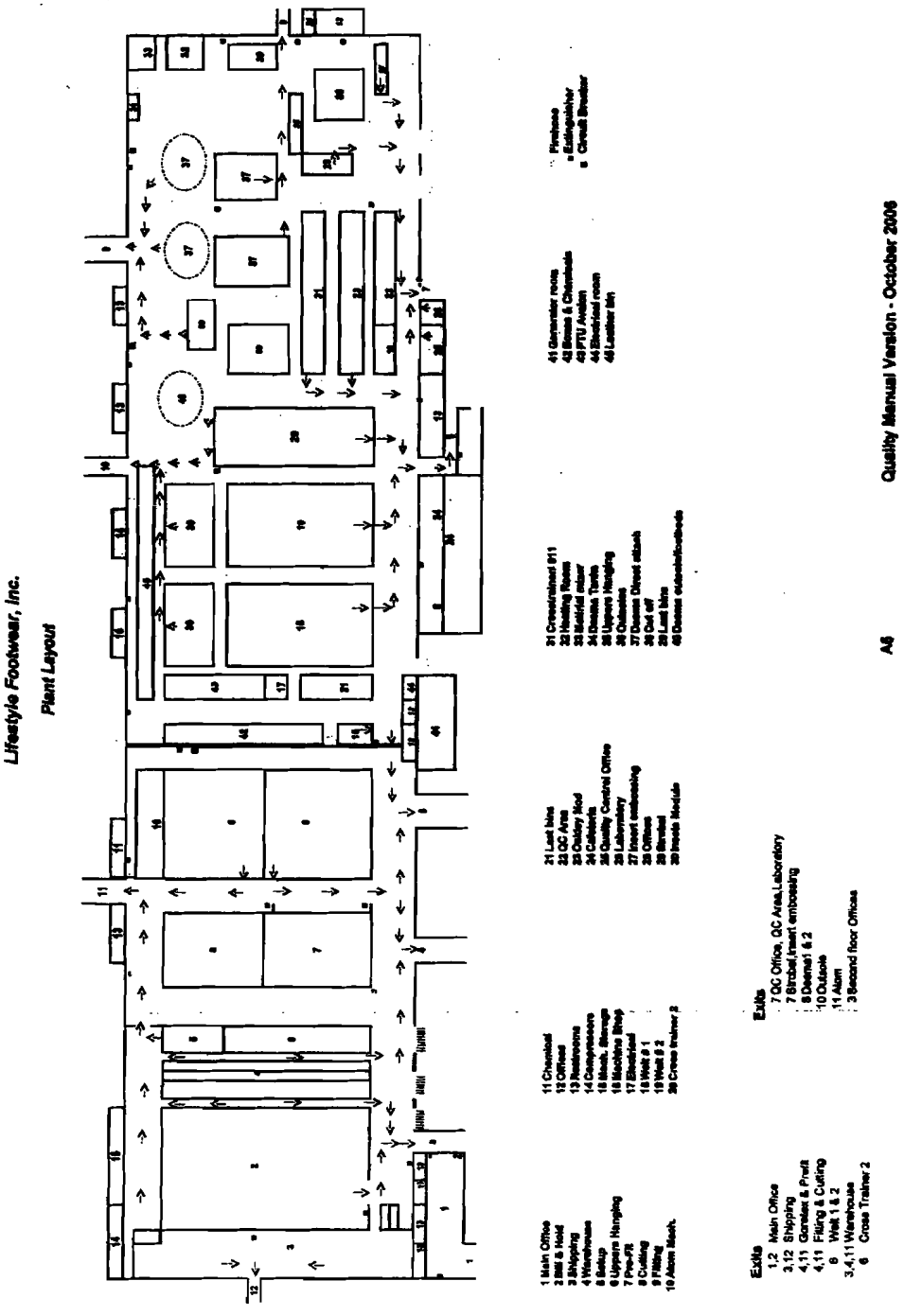
incidents). This reduces the possibility of incidents caused by mishandling of chemicals or equipment.

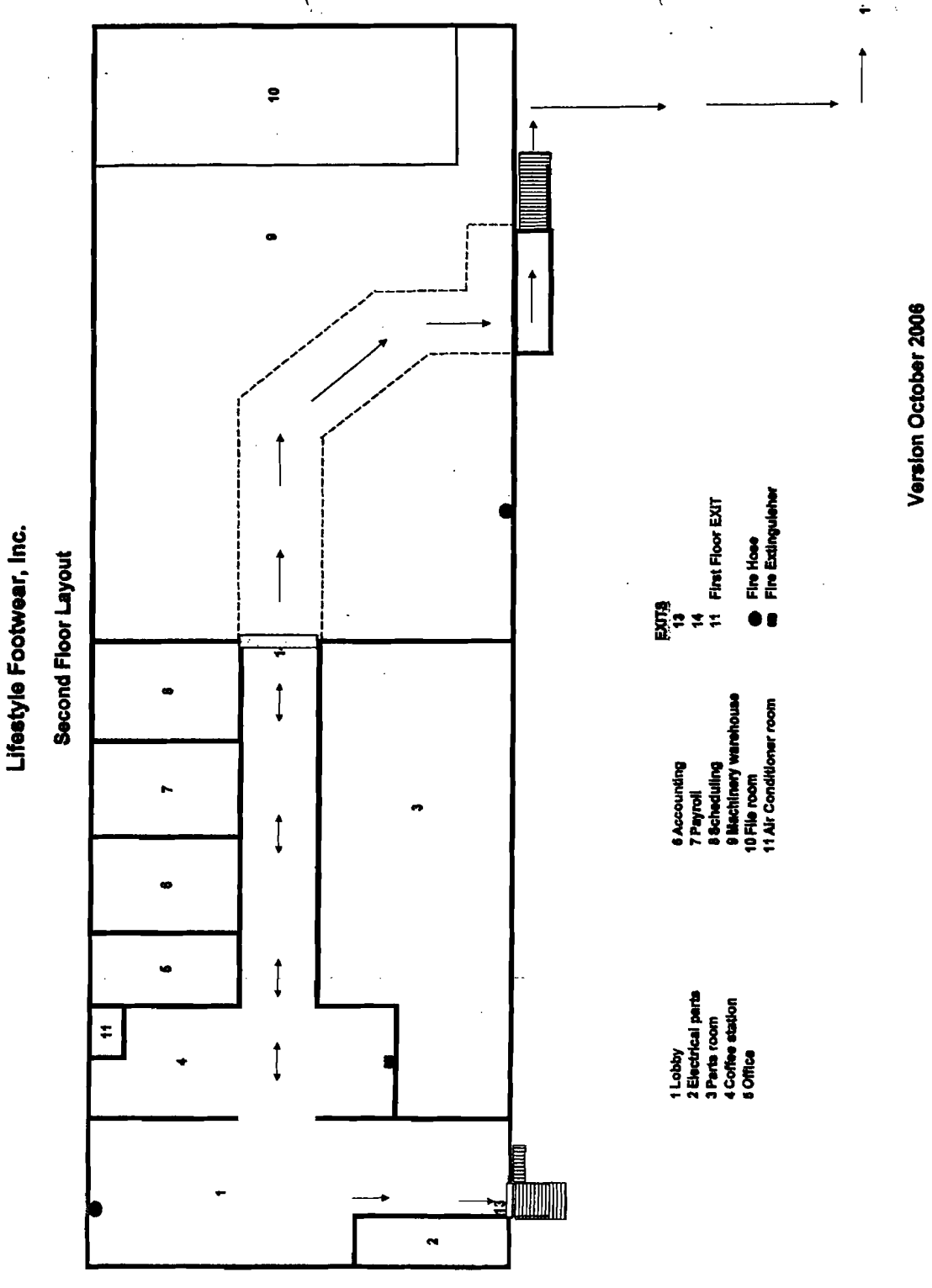
Every employee is responsible of maintaining his/her work area in proper condition, especially when leaving at the end of the corresponding shift. The following guideline is in place to maintain good housekeeping at LIFESTYLE. The practices contribute to maintaining a clean and orderly work environment and to the overall facility pollution control effort.

- Maintain container storage area neat and orderly. Chemicals are to be specially kept in neat condition and in a manner which does not promote the generation of releases.
- Collect any spill rapidly.
- Maintain dry and clean the floors by using adequate equipment.
- Maintain the pathways and walkways established for the employees clean and free of containers to avoid any spill.
- Remove any chemicals from dikes or any structures as soon as possible.
- Maintain up to date material inventory
- Identify all chemicals substances present in the workplace.
- Label all containers showing name and type of substance, appropriate hazards warnings, stock number, etc.

LIFESTYLE Maintenance Department has responsibilities for general housekeeping. Offsite contractors have to also follow these guidelines to prevent incidents.

APPENDIX C
EVACUATION ROUTES


Lifestyle Footwear, Inc.
Plant Layout
Quality Manual Version - October 2006
A6
Exits
1,2 Main Office
3,12 Shipping
4,11 Gardes & Prelt
4,11 Fitting & Cutting
8 Wet 1 & 2
3,4,11 Warehouse
6 Cross Trainer 2
Exits
7 QC Office, QC Area Laboratory
7 Strobel,Insert embossing
8 Dsmd 1 & 2
10 Outsole
11 Alum
3 Second floor Offices


Lifestyle Footwear, Inc.
Second Floor Layout
Version October 2006
1 Lobby
2 Electrical parts
3 Parts room
4 Coffee station
5 Office
6 Accounting
7 Payroll
8 Scheduling
9 Machinery warehouse
10 File room
11 Air Conditioner room
EXITS
13
14
11 First Floor EXIT
Fire Hose
Fire Extinguisher

APPENDIX D
RELEASE REPORTING REQUIREMENTS

RELEASE REPORTING

Reporting requirements for hazardous wastes releases are specified in various applicable federal and local laws and regulations, which are summarized below:

LAW	REGULATIONS
Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)	40 CFR 302
Superfund Amendments and Reauthorization Act (SARA)	40 CFR 335
Resource Conservation and Recovery Act (RCRA)	40 CFR 260 - 262 EQB's HWR

In addition, some reporting requirements are spelled out in site permits (consult LIFESTYLE Safety Department in this regard). The following is a summary of the release reporting requirements, as presently stated in the above-mentioned laws, regulations, and permits. Due to the dynamic nature of the above-mentioned laws and regulations (which are in constant change), the reader should consult them in order to have the most current information (especially for "reportable quantities").

A) Initial Assessment

The first step to determine reporting requirements regarding a specific release is to do an assessment of the characteristics of the emergency, in particular:

- Determine if the waste was really "released to the environment". For example, if the waste was fully contained within a concrete dike or a paved area and is not expected to volatilize at existing conditions, this does not constitute a "release to the environment". If the waste was really released to the environment, determine its name, chemical components, and associated concentration of each component (in the case of waste mixtures).
- Determine how many pounds of each component of the waste were "released to the environment". Determine (or estimate) relative proportions emitted to air, soil, and surface/groundwaters.
- Determine if the released waste exit the plant boundaries.
- Determine if the released waste reached the P.R. Aqueduct and Sewer Authority (PRASA's) sewerage system.

B) Determine if the Release Needs to be Reported

The following are the determinations that need to be made to determine whether the hazardous waste release needs to be reported to regulatory agencies. Any of the conditions mentioned below trigger reporting. In order to accomplish the requirements of the laws and regulations previously mentioned, ALL of the determinations mentioned below need to be done, regardless of the results of other determinations:

- ❖ Determine if the released waste is listed as a CERCLA Hazardous Substance (HS) in 40 CFR 302 and, if so, if the released quantity exceeds the Reportable Quantity (RQ) mentioned in the same regulatory reference. See Item C for details.
- ❖ If the released waste exits the property (i.e., an off-the-fence release), determine if the released substance is listed as a SARA Extremely Hazardous Substance (EHS) in 40 CFR 355 and, if so, if the released quantity exceeds the RQ mentioned in the same regulatory reference. See Item D for details.
- ❖ Determine if the released waste reached the PRASA's sewerage system and if so, if the release caused an exceedance of PRASA's pretreatment permit limitations/conditions (see Item F).

If any of the above applies (and considering that the released substance is a hazardous waste), the additional reporting requirements for hazardous waste releases stated on Item E also apply. Again, in the case of mixtures, it is important to analyze each of the components against each of the previously mentioned determinations in order to properly determine the need of reporting. Table D-1 provides RQs for some of the hazardous wastes handled at relatively large quantities at LIFESTYLE. A dash (-) has been placed in the respective RQ columns for wastes that do not presently have an RQ for the specified category.

C) Reporting Requirements for CERCLA Hazardous Substances

Report any release equal to or exceeding the RQ in any 24-hour period (see 40 CFR 302) to the NRC and/or U.S. Coast Guard (USCG) at (800) 424-8802. The report should contain the following information:

1. Name, address, and telephone of person notifying the release.
2. Location of release.
3. Type(s) of material(s) released/identity.
4. Estimate of quantity released.
5. Causes and circumstances of the release.
6. Possible source of the release.
7. Date and time of release.
8. Personnel injury or casualties, if any.
9. Corrective actions being taken and approximate timetable to complete them.
10. An assessment of existing or potential hazards (fire, explosion, etc.).

TABLE D-1

LIST OF HAZARDOUS WASTES AND REPORTABLE QUANTITIES
(in pounds)

Hazardous Waste	EPA's Waste Code(s)	Maximum Capacity of Storage Container (gallons)	HS (RQ in lbs.)	EHS (RQ in lbs.)
Acetone	D001, F003	10,000	5,000	-
Ethanol	D001	10,000	5,000	-
Ethyl Acetate	D001, F003, U112	10,000	5,000	-
Hydrochloric Acid	D002	10,000	5,000	-
				-
				-
				-

Legend: RQ=Reportable Quantity (in pounds)
HS= CERCLA Hazardous Substance (Item C)
EHS = SARA Extremely Hazardous Substance (Item D)

11. Any other information requested by NRC or USCG, or that can be provided to accelerate response procedures (such as any unique or unusual circumstances).

If the CERCLA Hazardous Substance release above the RQ also exits the property, the additional reporting requirements of Item D for EHS also apply. Since the CERCLA Hazardous Substance is a hazardous waste and it is released above the RQ, the additional reporting requirements of Item E also apply.

D) Reporting Requirements for SARA Extremely Hazardous Substances

Immediately report releases of "reportable quantities" of EHS which results in exposure to persons outside the boundaries of the facility to:

- Local Emergency Planning Committee (LEPC)
- State Emergency Response Commission (SERC)

Table 4.1 provides the telephone numbers for this reporting. The report should include the following:

- The chemical name or identity of any substance involved in the release.
- An indication of whether the substance is an extremely hazardous substance.
- An estimate of the quantity of any such substance that was released into the environment.
- The time and duration of the release.
- The medium or media into which the release occurred.
- Any known or anticipated acute or chronic health risks associated with the emergency and, where appropriate, advice regarding medical attention necessary for exposed individuals.
- Proper precautions to take as a result of the release, including evacuation (unless such information is readily available to the community emergency coordination pursuant to the emergency plan).
- The names and telephone number of the person or persons to be contacted for further information.

As soon as practicable after the release, a written follow-up emergency notice (or notices, as more information becomes available) setting forth and updating the information required under this section shall be provided to the LEPC and SERC, including additional information with respect to:

- Actions taken to respond to and contain the release,
- Any known or anticipated acute or chronic health risks associated with the release, and,
- Where appropriate, advice regarding medical attention necessary for exposed individuals.

E) Additional Reporting Requirements for Hazardous Wastes

The hazardous waste release shall also be reported to the EQB's Director of Land Pollution Control Area [(787) 767-8181] and the EPA's Regional Administrator. The information to be provided in such reporting shall be the same mentioned previously for CERCLA hazardous substances.

The verbal reporting must be followed with a written report (see Appendix E) within 15 days after the incident, indicating the final disposition of the recovered material that resulted from the incident (among others).

APPENDIX E
INCIDENT DOCUMENTATION

INCIDENT DOCUMENTATION

Upon completion of emergency response operations, a Post-Incident Report will be submitted to the Director of Environmental Affairs, Region II of U.S. EPA, and the Puerto Rico Environmental Quality Board. The report should contain all of the information listed below.

1. Name and address of the Company and/or owner;
2. Name and telephone number of Safety Health Officer;
3. Date and time of incident;
4. Time of official (verbal) release notification to the National Response Center and other regional and state officials;
5. Location of incident and the nature of the terrain at the location, including surface and subsurface drainage characteristics, relationship to water bodies, and estimated extent of area affected (such as miles of stream);
6. Weather conditions and how they affected response action;
7. Cause of incident;
8. Type and estimated amount (barrels, gallons, pounds) of released waste;
9. Actual damage and/or potential threat to human life, to property (private, state, or federal), and to plant or animal life;
10. Corrective actions taken;
11. Assistance required;
12. Estimated completion date of remedial actions and anticipated effectiveness;
13. Estimated quantity and disposition of released material and contaminated media (if any);
14. Confirmation that emergency response equipment is back in operation resuming chemical operator activities;
15. Description of any problems encountered during implementation of the Plan and an explanation of how the Plan was, or will be, modified to prevent the recurrence of the release event;
16. Anticipated or actual reaction by the news media and public to the incident (specify potential for liability);
17. A copy of this Plan if requested.

APPENDIX F
RESPONSE CRITIQUE AND REVIEW

RESPONSE CRITIQUE & REVIEW

It is of utmost importance that, after the conclusion of the emergency event, the plant staff and key persons involved in the incident meet and discuss all the aspects of the incident. This should be done with the main purposes of learning from the incident, how to avoid or minimize the possibility of recurrence, and to evaluate if response procedures need to be modified for the type of emergency observed. Some of the key questions to be asked during the critique and review of the response actions are the following:

1. Establish clearly the causes of the incident, paying particular attention on all details, some of which at first thought may appear to be minor or trivial, but that may be critical at the end of the evaluation process. Interview both the key personnel involved in the incident abatement and the affected personnel. When interviewing individuals, avoid the "finger-pointing" scenario, looking for responsible persons. This will affect the data to be gathered and the objectives of the evaluation. The key is to obtain clear data of what caused the incident, not to point out individual employees' behavior. Survey the affected area looking for anomalies causing the incident.
2. Do HWCP's procedures need change for the particular emergency?
3. Are there any internal plant physical changes required to be provided for the particular emergency and to maintain the safety of personnel? For example, are facility roads sufficiently wide for firefighting trucks?
4. Is there any additional emergency response/safety equipment needed?
5. Are there any additional internal personnel required to abate this type of emergency? Are there any additional training requirements for existing personnel? Does internal personnel needs to be relocated to other physical location or be assigned to other tasks?
6. Are there any additional external resources/contractors needed to abate this particular emergency?
7. Are there any additional actions (such as environmental sampling after release events) needed to determine the effects of the particular emergency/incident?
8. Think of different scenarios for the particular emergency. For example, if the incident happened in the day and within a regular plant working shift, evaluate if any measures need to be taken assuming the incident happens during the night and/or in off shift periods.
9. Are there any internal plant procedures that require change to attend this particular type of emergency?
10. Does the coordination among internal and external emergency contacts need to be improved? Do the capabilities of these internal/external emergency responders need to be upgraded?

The results of this evaluation should be communicated to all employees through written and verbal communications and appropriate actions taken as a result of this evaluation.

APPENDIX G
REGULATORY COMPLIANCE

REGULATORY COMPLIANCE

This appendix provides cross-reference tables (Tables G-1 and G-2, respectively), indicating the Federal/Local regulatory requirements pertaining to the preparation of a HWCP and the sections of the Plan in which each regulatory requirement is addressed.

TABLE G.1
REGULATORY COMPLIANCE TABLE FOR 40 CFR 262

Regulatory Citation (40 CFR)	Requirement Description	See Section
262.11	Requires that a person, who generates a solid waste, must determine if that waste is a hazardous waste.	-
262.34(a)	Requires that "while being accumulated on-site, each container is labeled or market clearly with the words "Hazardous Wastes"	2.2.3
262.34(a)(2)	Requires that the date upon which each period of hazardous waste accumulation begins must be clearly marked and visible for inspection on each container.	2.2.1 and TABLE B-1
262.34(d)(2) and 265.173 (a)	Requires container holding hazardous wastes to always be closed during storage, except when it is necessary to add or remove waste.	TABLE B-1
262.34(a)(1)	Requires that generator of hazardous wastes must comply with the requirements for management containers used to store hazardous wastes.	B-11
262.34(a)(1)(i), referencing 265.174	Requires the generator to inspect, at least weekly, areas where containers are stored, looking for leaking containers and for deterioration of containers and the containment system caused by corrosion and other factors.	2.2.3
262.34(a)(4) Referencing 265. 16	Requires that facility personnel must successfully complete an initial program of classroom instruction or in the job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of personnel training.	3.6 and B.6
262.34(a)(4)	Requires that each owner or operator must have a contingency plan for his facility. The contingency plan must be designed to minimize hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituent to air, soil, or surface water.	4.0

TABLE G.2
REGULATORY COMPLIANCE TABLE FOR EQB's HWR

Regulatory Citation	Requirement Description (see note at end of table)	See Section
207	Submit Operation Plan to the Board to obtain approval	1.8
207	Design Operation Plan to prevent the occurrence of accidents or disruptions	1.1, 1.7, Appendix B
207	Design Operation Plan to respond to accident or disruptions to avoid or reduce injury to human health or the environment	1.1, 4.0
207	Describe actions to be taken in response to hazardous waste incidents	4.0
207	Describe arrangements made with local authorities	3.4
207	Include updated list of names, addresses, and phone numbers of Safety Health Officers. Indicate Primary Safety Health Officer and alternates in the list.	3.2
207	Updated list of emergency response equipment, including its location, and brief description of its capabilities	3.5
207	Evacuation Plan, including signals and primary/alternate routes	4.2, Appendix C
207	Submit the Contingency Plan to local authorities	1.1, 1.8
I-803(E)(1)	Develop and submit Contingency Plan to the Board to obtain approval. Design Plan to minimize hazards to human health or the environment from hazardous waste incidents.	1.8, 1.1
I-803(E)(2)	Immediate implementation of the Plan at the time hazardous waste incidents occur	4.0
I-803(E)(3)	Describe actions to be taken in response to hazardous waste incidents	4.0
I-803(E)(5)	Describe arrangements made with local authorities	3.4
I-803(E)(6)	Include updated list of names, addresses, and phone numbers of Safety Health Officers. Indicate Primary Safety Health Officer and alternates in the list.	3.2
I-803(E)(7)	Updated list of emergency response equipment, including its location, and brief description of its capabilities	3.5
I-803(E)(8)	Evacuation Plan, including signals and primary/alternate routes	4.2, Appendix C
I-803(E)(9)	Maintain the Plan at the site. Submit the Plan to local authorities	1.1, 1.6.1, 1.8
I-803(E)(10)	When the Contingency Plan should be amended	1.3
I-803(E)(11)	Written emergency procedures	4.0

NOTE: The terms "Operation Plan", "Emergency Plan", and "Contingency Plan" are used interchangeably in the HWR to refer to the HWCP.

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PURCHASE ORDER

EXHIBIT XIV

DATE 7/08/06

PO Number: **P043611**

Cur: US Dollar

Rocky Shoes & Boots, Inc.
39 E. CANAL ST.
NELSONVILLE, OH 45764
PHONE: (740) 753-1951
FAX: (740) 753-4024

VENDOR:

Safety-Kleen Envirosystems Co.
P O Box 382066
PITTSBURGH
PA
15250 -8066

RECEIVING:

LIFESTYLE FOOTWEAR CO.
ROAD 125, KM 3.8
PARQUE INDUSTRIAL BARRIO PUEBLO
787 877-5050
MOCA, PR 00676

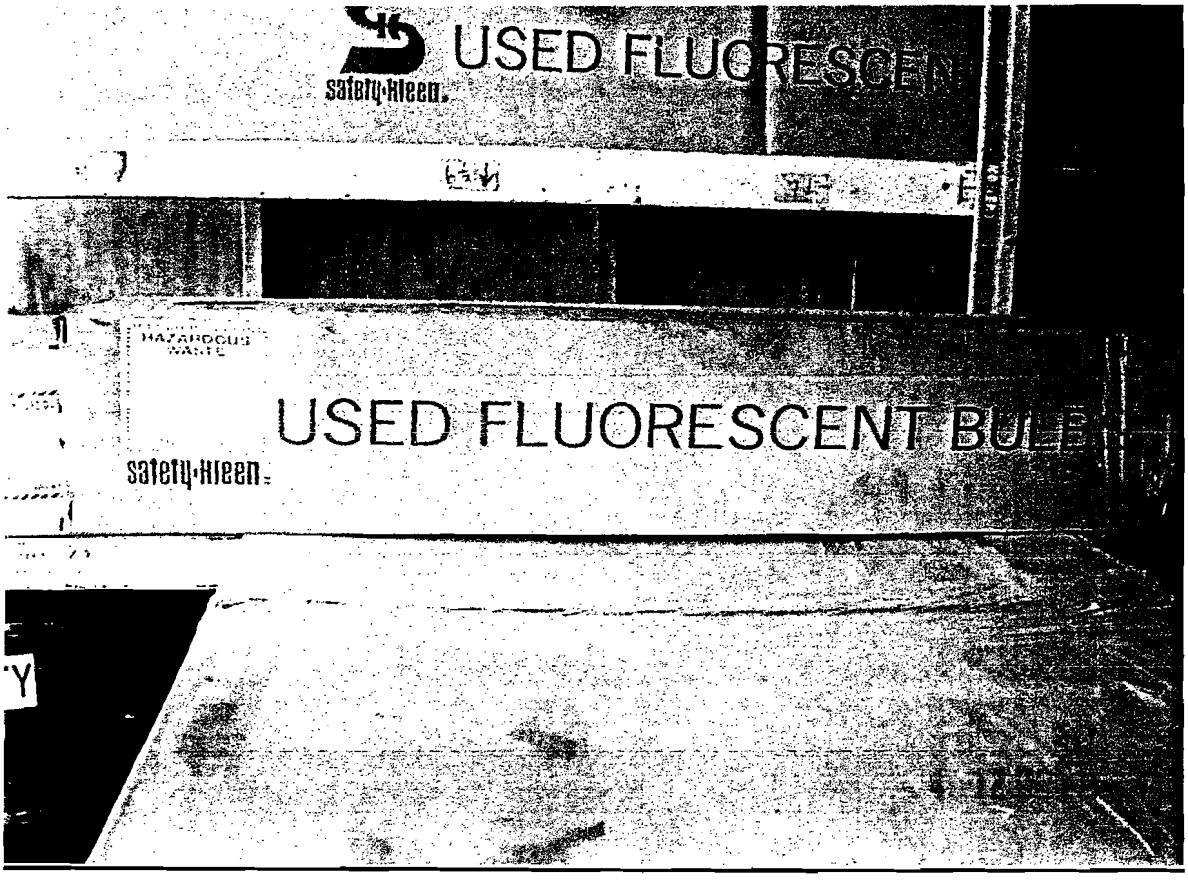
Line #	Item Number - Description Color/Width - Vendor Part No.	Delivery Date	Units UOM	Price per UOM	Value
		Delivery 7/14/06			
1	32 4FT BOX - 3206		3 EACH	80.00000 Per EACH	240.00
		Delivery 7/14/06			
2	32 8FT BOX - 3207		2 EACH	150.00000 Per EACH	300.00
	This payment include: Delivery, Pick Up and Disposal service				
			5	US Dollar	540.00

1. All attachements and enclosures are herein made part of the purchase order.
2. Do not overship or undership quantities and grades ordered.
3. For prompt payment our purchase order number must appear on all invoices and packages.

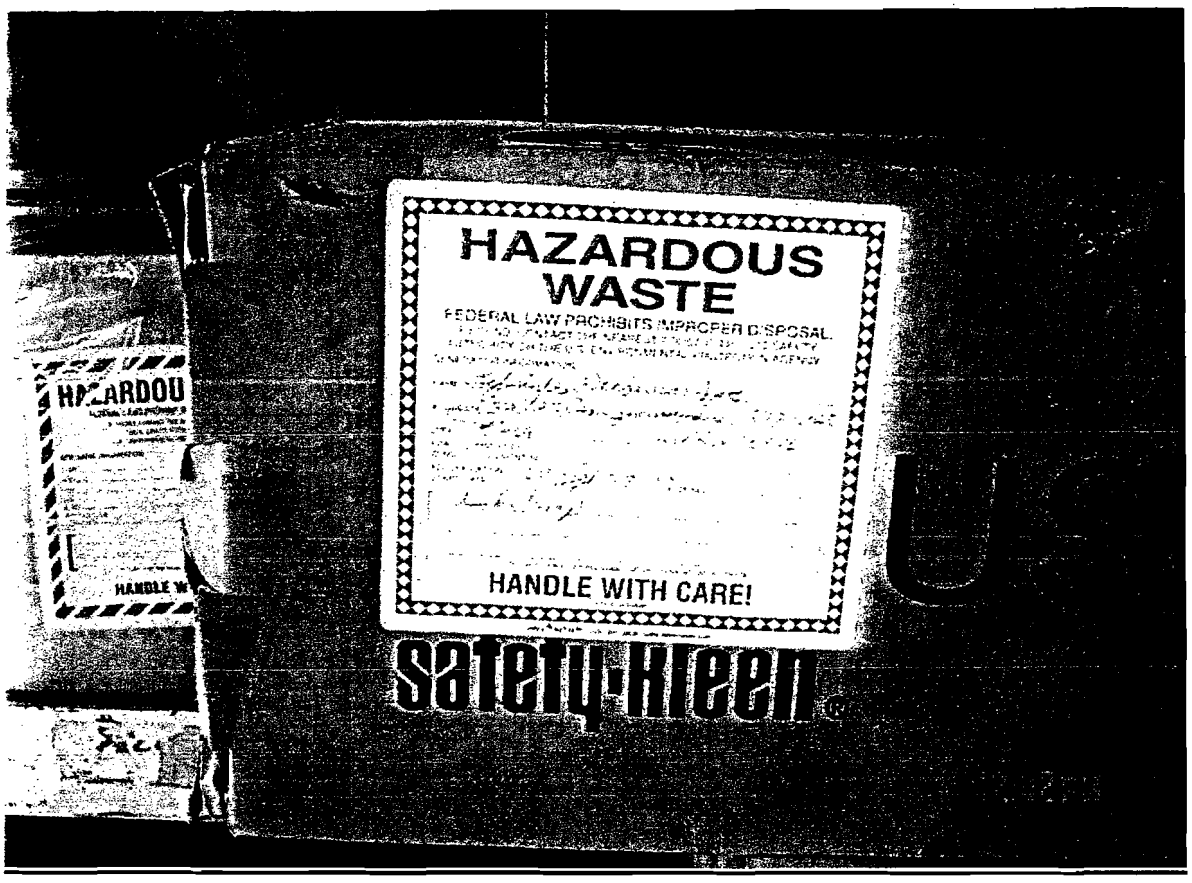
Authorized By: _____
SIGNATURE

RCKPO

EXHIBIT
XV



Waste Storage Area



Waste Storage Area

EXHIBIT
XVI

RECEIVING REPORT

Lifestyle Footwear, Inc.
Division Rocky Shoes & Boots

016036

Safety Kleen
Received From:
GRN # 89981

Date Received: 07/21/06
Our P.O. No. 43611 Shipt No.:
Packing Slip No. Total Pages:

Write the total amount rec'd in the corresponding box

Cartons	Boxes	Packages	Rolls	Bundles	Skids

Rec'd Via: Somi
(UPS, Fed Exp. Navieras, Allen Trailer, Truck, etc.)
Tracking No. Manifest 6006

Partial Shipt ____ Complete Shipt ✓

Container No. -

Mark with an "X" the type of material received

Raw Mat'ls	Mach. Parts	Mis. Supply	Office Supply	Service Call	Safety Supply

Rec. Rep. prepared by: F. Alvarado
Mat'ls physically rec'd by: Rafael Ro—

Quantity	Item Number	Description	Posted
8	3206	4 Feet Boxes	
2	3207	8 Feet Boxes	
	X	Florescent lamps	

see Manifest ok for disposal

White Copy - Accounts Payable Dept. Pink copy - Purchasing file Canary copy - Raw Material Warehouse

P.O. Box 11393
Columbia, SC 29211

DUNS NO: 05-397-6551
FED ID NO: 35-1283524

safety-kleen.

ORIGINAL INVOICE

PLANTA DE SERVICIO SK:	ESTADO DE IMPUESTOS/NUM.:	FECHA DE FACTURACION:	NO. DE FACTURA
R Manati		07/27/2006	P000107902
TELEFONO:	No. VENDEDOR:	TERMINOS: Net 30	

000025 1 MB 0.326 0025/000025/000026 003 1 6209001
LIFESTYLE FOOTWEAR INC
CARR 125 KM 3.8
P.O. BOX 728
MOCA PR 00676-0728

UBICACION DE SERVICIO:

LIFESTYLE FOOTWEAR INC
CARR 125 KM 3.8
P.O. BOX 728
MOCA , PR 00676

No. DE CUENTA:	No. DE SERVICIO:	No. DE UBICACION:	CODIGO ESPECIAL PARA COBRO:
0009404880	0009404880	961001	003 30

Departamento: 00 **Nombre Del Departamento:**
FECHA DE SERVICIO: 07/26/2006 **No. De Doc. De Servicio:** P000107902 **No. De Orden Compra:** 43611
No. De Liberacion: **Transportista:** **No. De Manifiesto:**

CANTIDAD	DESC. /NO. DE REFERENCIA	PRECIO	POR	IMPUESTO VENTA	TOTAL DE ARTICULO
1.000	FLUORESCENT BULB PROGRAM 000022444-52-000000000-0000000		EA	0.00	0.00
3.000	BOX FLOR BULBS 4' 000003206-00-000000000-0000000	80.0000	EA	0.00	240.00
2.000	BOX FLOR BULBS 8' 000003207-00-000000000-0000000	150.0000	EA	0.00	300.00
	INVOICE SUBTOTAL				540.00
	CANTIDAD DE PAGO				**$540.00**

8/2/06
89281
43611
Inv. Rcvd 8/2/06
CZ-000075
024021?
Rq 00198963
Aprobado Alvarado

Comentarios:

26

FAVOR REMITA ESTA SECCION CON SU PAGO. SIRVASE HACER LAS CORRECIONES NECESARIAS A SU DIRECCION EN CAS DE CAMBIOS. GRACIAS.

LIFESTYLE FOOTWEAR INC, P.O. BOX 728, MOCA, PR 00676

No. DE CUENTA	No. DE FACTURA	FECHA DE FACTURA	No. DE SERVICIO	CANTIDAD PAGADA
0009404880	P000107902	07/27/2006	0009404880	

0P000107902000940488050000054000l

PO Box 382066
Pittsburgh, PA 15250-8066

AMOUNT DUE
$540.00

Environmental Quality Board

COMMONWEALTH OF PUERTO RICO
ENVIRONMENTAL QUALITY BOARD
P.O. BOX 11488, Santurce, Puerto Rico 00910

A)200102785/40155930

9-610-01

6

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

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: PRR000012096 — Manifest Document No.: 06007
2. Page 1 of 2 — Information in the shaded areas is not required by Federal Law.

GENERATOR

3. Generator's Name and Mailing Address:
LIFESTYLE FOOTWEAR INC
CARR 129 KM 3.8 P.O. BOX 728
MOCA PR00676

4. Generator's Phone (787 877-5050

A. State Manifest Document Number:

B. State Generator's ID:

5. Transporter 1 Company Name: SAFETY-KLEEN (MANATI) INC — 6. US EPA ID Number: PRD090399718
C. State Transporter's ID: HW-02
D. Transporter's Phone: 787 854-1090

7. Transporter 2 Company Name: — 8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address: 000650 — 10. US EPA ID Number:
SAFETY-KLEEN (MANATI) INC.
KM51 HWY #2
MANATI, PR 00674 — PRD090399718
G. State Facility's ID:
H. Facility's Phone: 787 854-1090

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit WT/Vol	I. Waste No.
a. RQ WASTE PAINT RELATED MATERIALS 3 UN1263 PG II (D001) (ERG#128)	02	CW	800	P	F003 F005
b. WASTE MERCURY, 8, UN2809, PG III, CONTAINED IN MANUFACTURED ARTICLES, (D009)(ERG#172) (CONTAINS <2500 MG/KG)	04	CW	150	P	D009
c. ISOCYANATE SOLUTIONS, TOXIC, N.O.S. (DIPHENYLMETHANE DIISOCYANATE) 6.1 UN2206 PGIII (ERG#155)	02	DM	10	G	NONE
d. ISOCYANATE SOLUTIONS, TOXIC, N.O.S. DIPHENYLMETHANE DIISOCYANATE) 6.1 UN2206 PGIII (ERG#155)	01	DM	55	G	NONE

J. Additional Descriptions for Materials Listed Above:
A) D001 D035 D005 D006 D007 D008 WASTE PAINT
B) FLUORESCENT LAMPS
C,D) BAYFLEX ISO 90990

K. Handling Codes for Wastes Listed Above:
a,c,d) S01
b)T18 (RECYCLING)

15. Special Handling Instructions and Additional Information
MFST R/T#107582026 0009-4048-60
EMERGENCY RESP 1-800-468-1760(24 HR)IF UNDELIVERABLE RETURN TO GENERATOR
ALT TSDF SCD077395486 SAFETY-KLEEN 130-A FRONTAGE RD. LEXINGTON, SC 29073
24 hours Emergency response information number - Infotrac 1-(800) 468-1760
SKDOT# A: 13579 B: 15030 C: 1231231 D: 1231231

16 **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practiable and that I have selected the practiable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Type Name (ON BEHALF OF) | Signature | Month | Day | Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name | Signature | Month | Day | Year

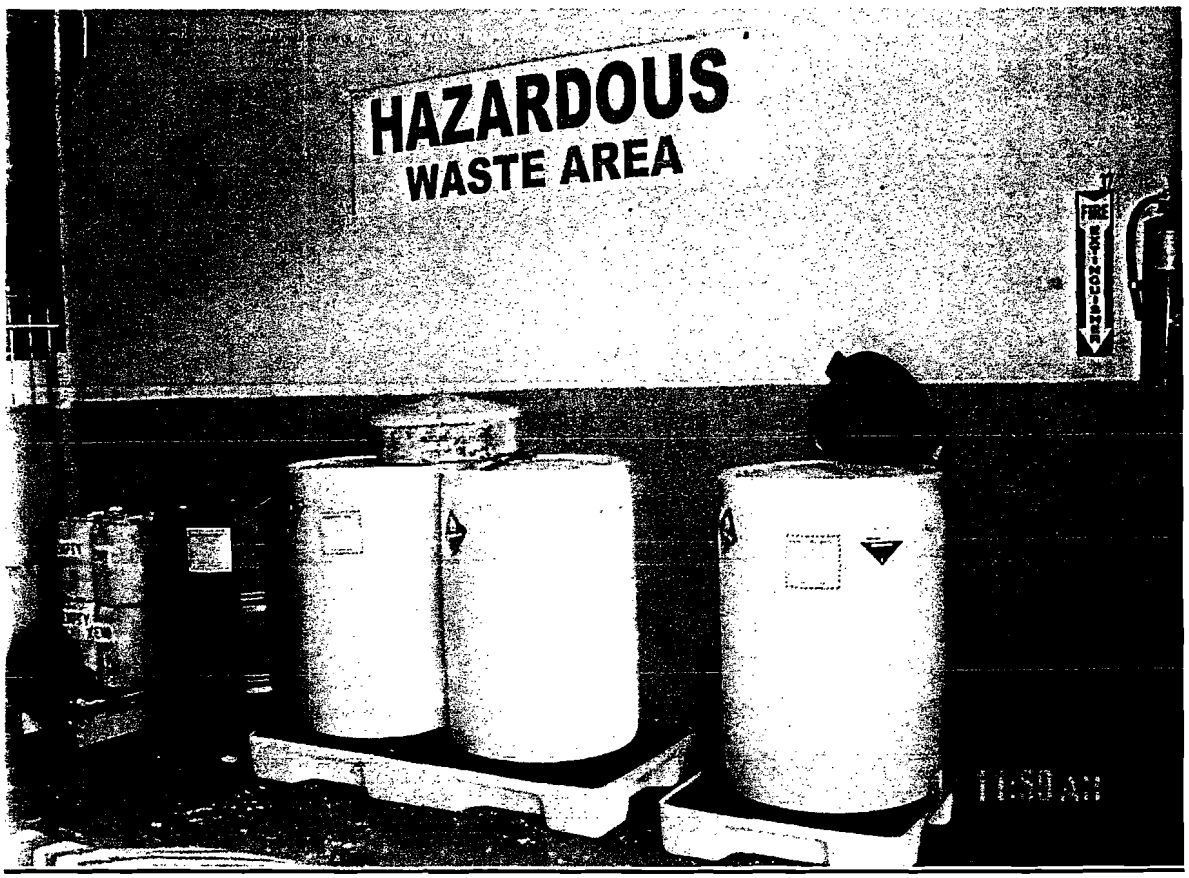
FACILITY

19. Discrepancy Indication Space

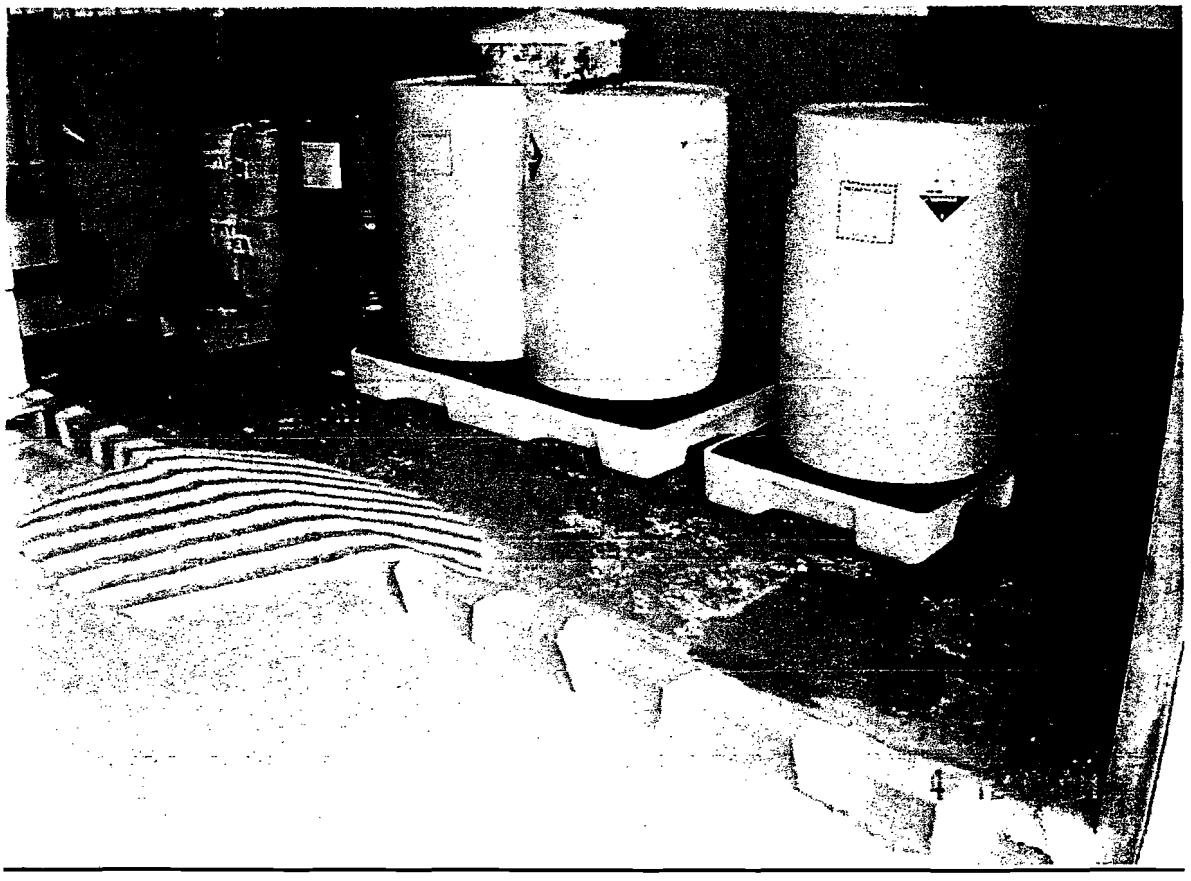
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.
Printed/Typed Name | Signature | Month | Day | Year

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

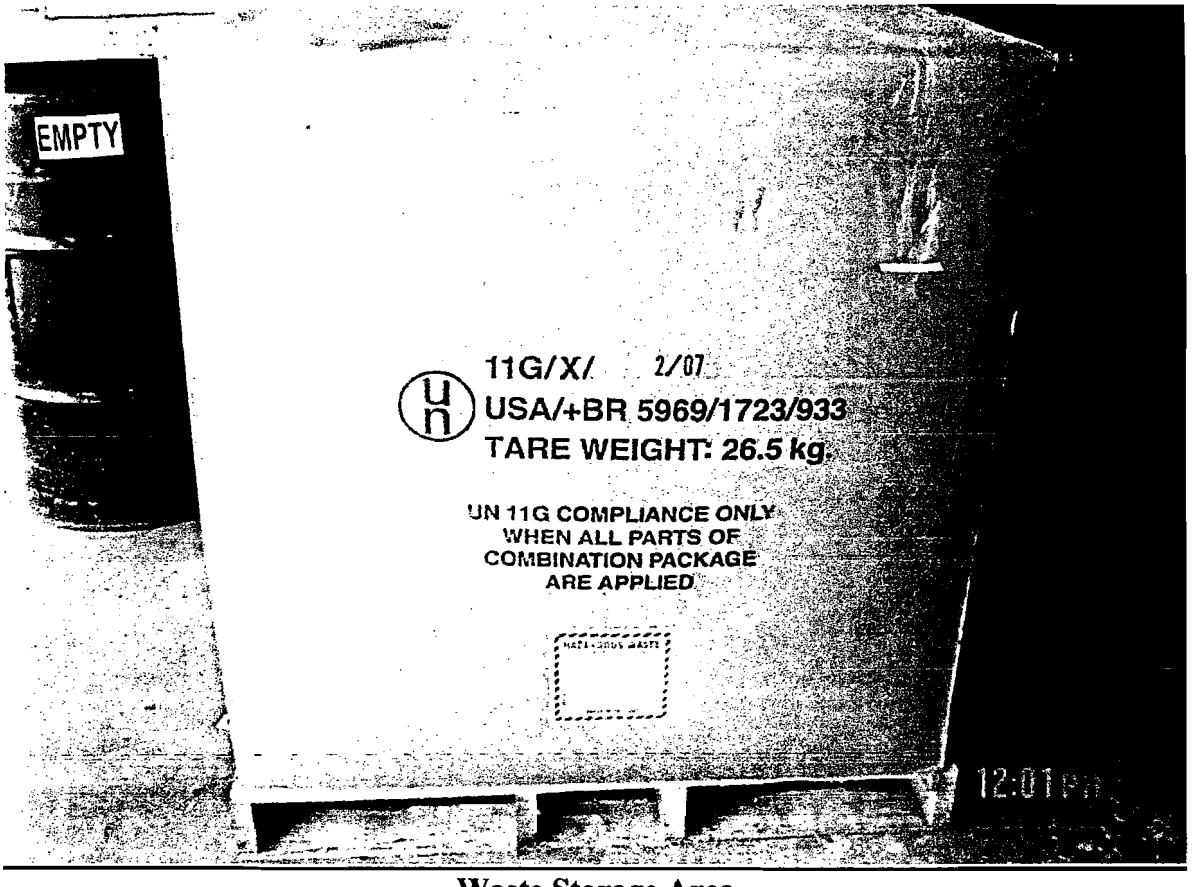
EXHIBIT
XVII



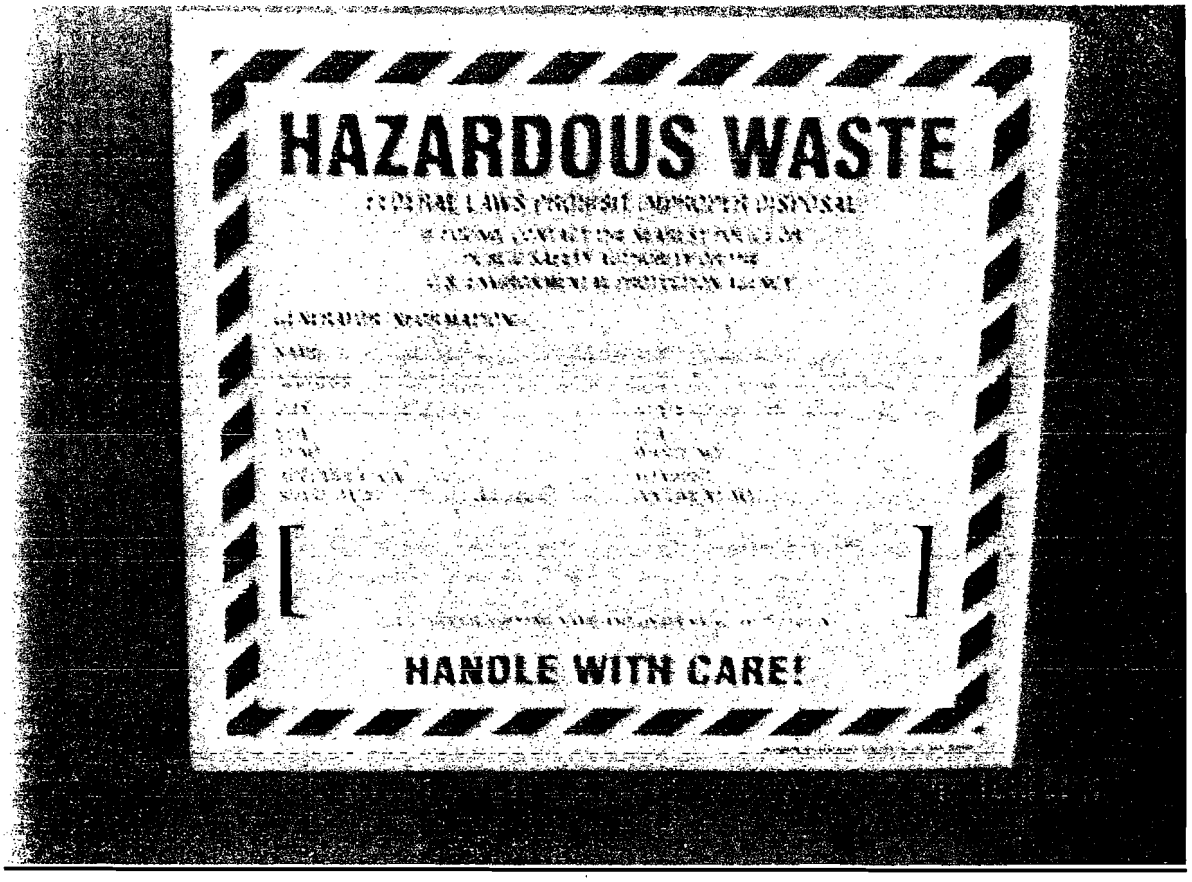
Waste Storage Area



Waste Storage Area



Waste Storage Area



Waste Storage Area

This Memorandum Bill of Lading, nor a copy or duplicate, covering the property named herein, intended solely for [illegible] record.

EXHIBIT XVIII

Page 1 of 1

SAFETY-KLEEN ENVIROSYSTEMS CO. OF PR INC.

(Name of carrier) (SCAC)

Carrier No.

Date 3/31/2006

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

TO
Co. SAFETY-KLEEN ENVIROSYSTEMS CO. OF PR
Street HWY. #2 KM 31.0, P.O. BOX 31098
City MANATI State PR Zip Code 00675

FROM:
Shipper LIFESTYLE FOOTWEAR INC.
Street P.O. BOX 728
City MOCA State PR Zip Code 00676
24 hr. Emergency Contact Tel. No. "3E" 1-800-468-1760

Route

Vehicle Number

No. of Units & Container Type	HM	BASIC DESCRIPTON Proper Shipping Name, Hazard Class, Identification Number (UN or NA), Packing Group, per 172.101, 172.202, 172.203	TOTAL QUANTITY (Weight, Volume, Gallons, etc.)	WEIGHT (Subject to Correction)	RATE	CHARGES (For Carrier Use Only)
		RESIDUE: LAST CONTAINED - NOT A US DOT OR US				
		EPA RECULATED MATERIAL. (55 GALLON DRUM)	10			
		RESIDUE: LAST CONTAINED - NOT A US DOT OR US				
		EPA REGULATED MATERIAL. (5 GALLON DRUM)	60			

PLACARDS TENDERED: YES ☐ NO ☐

(1) Where the rate is dependent on value, shippeers ara required to state specifically in writing the agreed or declared value of the property, as follows: "The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding _____ per _____."
(2) Where the applicable tariff provisions specify a limitation of the carrier's liability absent a release or a value declaration by the shipper and the shipper does not release the carrier's liability or declare a value, the carrier's liability shall be limited to the extent provided by such provisions. See NMFC Item 172.
(3)Commodities requiring special or additional care or attention in handling or stowing must be so marked and packaged as to ensure safe transportation. See section 2(e) of item 360, Bills of Lading, Freight Bills and Statements of Charges and Section 1(a) of the Contract Terms and Conditions for a list of such articles.

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 labelled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations.

_____ Signature

REMIT C.O.D. TO: ADDRESS

COD Amt: $

C.O.D. FEE: PREPAID ☐ COLLECT ☐ $

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

_____ (Signature of Consignor)

TOTAL CHARGES: $

FREIGHT CHARGES
FREIGHT PREPAID except when box at right is checked ☐ Check box if charges are to be collect

RECEIVED, subject to classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER LIFESTYLE FOOTWEAR INC.
PER [signature]

CARRIER SAFETY-KLEEN ENVIROSYSTEMS CO. OF PR INC.
PER [signature]
DATE 3/31/06

3

Permanent post-office address of shipper

(Alt. 11/97) STYLE F160-3 LABELMASTER® (800) 621-5808 www.labelmaster.com

PRINTED ON RECYCLED PAPER USING SOYBEAN INK SOY INK

COMMONWEALTH OF PUERTO RICO
ENVIRONMENTAL QUALITY BOARD
P.O. BOX 11488, Santurce, Puerto Rico 00910

Environmental Quality Board

A)2306021/40149080

9-610-01

EXHIBIT XIX

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

Form Approved. OMB No. 2050-0039. Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal Law.
PRR000012096	06006		

GENERATOR

3. Generator's Name and Mailing Address
LIFESTYLE FOOTWEAR INC
CARR 125 KM 3.8 P.O. BOX 728
MOCA PR00676

4. Generator's Phone ( ) 787-877-5050

A. State Manifest Document Number

B. State Generator's ID

5. Transporter 1 Company Name — 6. US EPA ID Number
SAFETY-KLEEN (MANATI) INC — PRD090399718

C. State Transporter's ID HW-02

D. Transporter's Phone 787 854-1090

7. Transporter 2 Company Name — 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address 000650 — 10. US EPA ID Number
SAFETY-KLEEN (MANATI) INC.
KM51 HWY #2
MANATI, PR 00674 — PRD090399718

G. State Facility's ID

H. Facility's Phone 787 854-1090

11. US DOT Description (*Including Proper Shipping Name, Hazard Class, and ID Number*)	12. Containers No.	Type	13. Total Quantity	14. Unit WT/Vol	I. Waste No.
a. ISOCYANATE SOLUTIONS, TOXIC, N.O.S. (DIPHENYLMETHANE DIISOCYANATE) 6.1 UN2206 PGIII (ERG#155)	11	DM	605	G	NONE
b.					
c.					
d.					

j. Additional Descriptions for Materials Listed Above
A)BAYFLEX ISO 90990 (PASS THROUGH ONLY)

k. Handling Codes for Wastes Listed Above
(A) S01

15. Special Handling Instructions and Additional Information
MFST R/T#107549484 0009-4048-30
EMERGENCY RESP 1-800-468-1760(24 HR)IF UNDELIVERABLE RETURN TO GENERATOR.
ALT RSDF-SCD077935488 SAFETY-KLEEN 130-A FRONTAGE RD. LEXINGTON SC 29072
24 hours Emergency response information number - Infotrac 1-(800) 468-1760

16 **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practiable and that I have selected the practiable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; **OR**, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Type Name (ON BEHALF OF)	Signature	Month	Day	Year

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
			5	

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name	Signature	Month	Day	Year

IN CASE OF EMERGENCY OF SPILL IMMEDIATELY CALL THE ENVIRONMENTAL QUALITY BOARD (809) 722-0439

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

P.O. Box 11393
Columbia, SC 29211

DUNS NO: 05-397-6551
FED ID NO: 35-1283524

safety-kleen

ORIGINAL INVOICE

PLANTA DE SERVICIO SK:	ESTADO DE IMPUESTOS/NUM.:	FECHA DE FACTURACION:	NO. DE FACTURA
BR Manati		07/27/2006	0017109611
No. TELEFONO:	No. VENDEDOR:	TERMINOS: Net 30	

000026 1 MB 0.326 0026/000026/000027 003 1 6209001
LIFESTYLE FOOTWEAR INC
CARR 125 KM 3.8
P.O. BOX 728
MOCA PR 00676-0728

UBICACION DE SERVICIO:

LIFESTYLE FOOTWEAR INC
CARR 125 KM 3.8
P.O. BOX 728
MOCA , PR 00676

No. DE CUENTA:	No. DE SERVICIO:	No. DE UBICACION:	CODIGO ESPECIAL PARA COBRO:
0009404880	0009404880	961001	003 30

Departamento: 00 **Nombre Del Departamento:**
FECHA DE SERVICIO: 07/26/2006 **No. De Doc. De Servicio:** 0017109611 **No. De Orden Compra:** 43855
No. De Liberacion: **Transportista:** **No. De Manifiesto:** 06006

CANTIDAD	DESC. /NO. DE REFERENCIA	PRECIO	POR	IMPUESTO VENTA	TOTAL DE ARTICULO
11.000	LANDF USDOT HAZMAT, NON R 55GL 000088888-52-040149080-0875470 0002306021 BAYFLEX ISO 90990	325.0000	DR	0.00	3,575.00
	INVOICE SUBTOTAL				3575.00
	CANTIDAD DE PAGO				**$3,575.00**

Logged 8/2/06
Correct 89282
PO 43885
Inv. Recd. 8/2/06
Vendor 0 2200075
0240712
Approved Mónica Alvarado
Ck 00198962

Comentarios:

27

FAVOR REMITA ESTA SECCION CON SU PAGO. SIRVASE HACER LAS CORRECIONES NECESARIAS A SU DIRECCION EN CAS DE CAMBIOS. GRACIAS.

LIFESTYLE FOOTWEAR INC, P.O. BOX 728, MOCA, PR 00676

safety-kleen

No. DE CUENTA	No. DE FACTURA	FECHA DE FACTURA	No. DE SERVICIO	CANTIDAD PAGADA
0009404880	0017109611	07/27/2006	0009404880	

000171096110009404880500003575001

PO Box 382066
Pittsburgh, PA 15250-8066

AMOUNT DUE
$3,575.00

Bostik

XX

MATERIAL SAFETY DATA SHEET

1. CHEMICAL PRODUCT & COMPANY IDENTIFICATION

Product name	**H251760**
Product name(s) covered	See Section 16 for Product Names Covered.
MSDS name	THERMOGRIP 6368-15 25LB CTN
CAS number	Mixture
Generic description	EVA Hotmelts
Manufacturer	Bostik, Inc. 211 Boston Street Middleton, MA 01949 USA
24 hour emergency assistance	Telephone: 1-800-227-0332
General assistance	Telephone: 1-978-777-0100
MSDS assistance	Telephone: 1-414-607-1347

2. COMPOSITION / INFORMATION ON INGREDIENTS

The manufacturer lists no ingredients as hazardous according to OSHA 29 CFR 1910.1200.

3. HAZARDS IDENTIFICATION

Emergency overview	Extended contact with this material may cause irritation to the skin, eyes, and mucous membranes. Contact with molten material will cause thermal burns. Primary Routes of Exposure: eyes, skin, and inhalation.
Potential health effects	
Skin	Molten material will produce burns to skin areas.
Eyes	HOT MOLTEN material can cause irreversible eye injury and burns. Contact with SOLID material may cause irritation with temporary redness with stinging and tearing.
Inhalation	Inhalation of hot mist may cause respiratory irritation.
Ingestion	Exposure is unlikely. This product can cause gastrointestinal irritation, nausea, vomiting, and diarrhea. Molten material will produce burns to the gastrointestinal tract.
Target organs	None known for product as a whole.
Fire and explosion	This product will not ignite under normal situations but can be ignited in the extreme heat associated with a fire. Vapors are lighter than air and should rise, accumulating in overhangs and ceilings. In a fire situation, exposed containers may build up pressure and burst explosively spewing hot material. Irritating and potentially harmful vapors may be released in a fire or spill situation.

4. FIRST AID MEASURES

First aid

Skin	For contact with molten product, do not remove any material or clothing adhering to the skin. Flush the burned area immediately with large amounts of cold water. If it is possible, submerge the area in cold water. Immediately seek medical attention or contact a physician.
Eye	If molten material contacts the eye, immediately flush with plenty of water for at least 15 minutes. Get medical attention immediately. See Notes to Physician.
Inhalation	Remove to fresh air. Get medical attention immediately for a large dose exposure or if cough or other symptoms develop.
Ingestion	If ingested, get immediate medical attention. Do not induce vomiting unless instructed to do so by medical personnel. Never give anything by mouth to a victim who is unconscious or is having convulsions.
Notes to physician	Burns should be treated as thermal burns. The material will come off as healing occurs, therefore, immediate removal from skin is not necessary, as it may cause additional harm to the skin.

5. FIRE FIGHTING MEASURES

Hazardous combustion products	Decomposition can produce hazardous chemicals. Carbon monoxide, carbon dioxide, acetic acid, vinyl acetate, and other unknown products may be produced during combustion.
Extinguishing media	Use dry chemical, carbon dioxide, or foam. Do not use water on molten adhesive to avoid splattering and spreading of fire.
Dust explosion hazard	None Known
Sensitivity to mechanical impact	None Known
Sensitivity to static discharge	None Known
Unusual fire & explosion hazards	Do not use water on molten adhesive to avoid splattering and spreading of fire.
Fire fighting equipment/instructions	Firefighters should wear full protective clothing including self contained breathing apparatus.
Flash point	> 400 °F (> 204.4 °C)

6. ACCIDENTAL RELEASE MEASURES

Emergency action	Appropriate safety measures and protective equipment should be used. See Section 8. Dispose of as solid waste in compliance with local, state, and federal regulations.
Containment	Isolate spill area. Stop discharge if safe to do so. Pellet or chip spill: Collect and contain for salvage or disposal. Molten adhesive spill: Placard hot material, allow to cool and remove. Collect and contain for salvage or disposal. Stop material from contaminating soil or from entering sewers or water streams.
Reporting	See Federal reporting requirements listed in Section 15. We recommend you contact local authorities to determine if there may be other local reporting requirements.

7. HANDLING & STORAGE

For Commercial Use Only - Not Packaged or Labeled for Home Use!

Handling	Avoid contact with skin and eyes. Avoid contact with molten material. Wash hands thoroughly after handling, especially before eating, drinking, smoking, and using restroom facilities. Wash contaminated goggles, face shields, and gloves. Professionally launder contaminated clothing before re-use. Avoid breathing fumes if this product is used at high temperatures. Use this product with adequate ventilation.
Storage	Store in a clean, dry area. Keep containers closed.
Empty container precaution	Attention! Follow label warnings even after container is emptied since empty containers may retain product residues. Do not reuse empty container without professional cleaning for food, clothing, or products for human or animal consumption, or where skin contact can occur.

8. EXPOSURE CONTROLS / PERSONAL PROTECTION

Engineering controls	Use local exhaust ventilation when vapors, mists, or dusts are being generated. Suitable respiratory equipment should be used when insufficient ventilation or operational procedures demand it.
Eye protection	Wear goggles or safety glasses with side shields. Contact lenses should not be worn.
Skin and body protection	Cover as much of exposed skin as possible. Wear protective clothing that provides protection against skin exposure and thermal burns, including longsleeved protective shirt, long pants, work shoes/boots, hard hat, face shield, and long-cuffed, rubber, thermal insulating gloves.
Respiratory protection	None required where adequate ventilation conditions exist. If airborne concentrations are above the applicable exposure limits, use NIOSH approved respiratory protection.
General	Eye wash fountain and emergency showers should be readily available.

9. PHYSICAL & CHEMICAL PROPERTIES

Target solids	100 %
pH	N/A
Density	0.94 g/cc
Odor	mild
Color	light amber
Physical state	Solid
Freeze protect	No

10. STABILITY & REACTIVITY

Hazardous reactions/decomposition products	If product is burned carbon monoxide, carbon dioxide, acetic acid, vinyl acetate, and other unknown products may be produced.
Hazardous polymerization	Will not occur.
Conditions to avoid	Do not add water or other volatile material to molten adhesive. Avoid excessive overheating.
Stability	Stable under normal conditions. Avoid water sensitive materials such as acids or alkalis or sodium and other metallic hydrides.

11. TOXICOLOGICAL INFORMATION

Toxicological data	If any toxicological data is available, it will be listed below:
Carcinogenicity	If this product contains any carcinogens, they will be noted below:

12. ECOLOGICAL INFORMATION

Bostik's hot melt adhesives are manufactured without the intentional use of volatile organic compounds and/or hazardous air pollutants regulated by the EPA in the Clean Air Act Amendment of 1990.

Ecotoxicological information	No data available for this product.

13. DISPOSAL CONSIDERATIONS

It is the obligation of each user of the product mentioned herein to determine and comply with the requirements of all applicable local, state and federal regulations.

Waste disposal	This product as supplied is not considered a hazardous waste under RCRA. Dispose of in compliance with all local, state, and federal regulations. Recommended disposal method is incineration.

14. TRANSPORT INFORMATION

Department of Transportation (DOT) Requirements

Not regulated as dangerous goods.

IATA

Not regulated as dangerous goods.

IMDG

Not regulated as dangerous goods.

15. REGULATORY INFORMATION

All components are on the U.S. EPA TSCA Inventory List.

This MSDS is prepared and distributed pursuant to the Federal Hazard Communication Standard, 29 CFR 1910.1200.

State regulations	If this product contains any ingredients listed under California Proposition 65, they will be noted below:
International regulations	This product has been classified in accordance with the hazard criteria of the Controlled Products Regulations and contains all the information required by the Controlled Products Regulations.
HMIS Ratings	Health: 1 Flammability: 1 Physical hazard: 0 Personal protection: X
SARA 311/312 HAZARD CATEGORIES	Immediate Hazard - No Delayed Hazard - No Fire Hazard - No Pressure Hazard - No Reactivity Hazard - No
WHMIS status	Non-controlled

16. OTHER INFORMATION

Disclaimer	The data in this MSDS has been compiled from publicly available sources. This data relates only to the designated product and not to the use of said product in combination with other materials. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards which exist. Responsibility for proper precautions and safe use of the product lies with the user. All data in this MSDS is typical of the product as a whole, and does not represent any individual lot or batch, therefore, Bostik, Inc. makes no warranty about the accuracy of the data herein and assumes no liability for the use of such data. It is the responsibility of the user to comply with all applicable federal, state, and local laws and regulations.
Further information	Any characters following " H251760 " are just designations for the various types of packaging that are available for this product. These characters do not indicate a different product nor a different regulatory, health, safety and/or environmental status. This document covers the H251760 for all of its packaging types.
Issue date	08/01/2007
Prepared by	Michael Simon
Supercedes	05/22/2006
MSDS sections updated	Other Information: Disclaimer

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: C-1064 **HMIS CODES: H F R P**
1 0 0

SECTION I - MANUFACTURER IDENTIFICATION

MANUFACTURER'S NAME: Slocum Adhesives Corp.
ADDRESS : 2500 Carroll Avenue
Lynchburg, VA 24501

EMERGENCY PHONE : 800-424-9300 (CHEMTREC) DATE PRINTED : 10/4/2006
INFORMATION PHONE : 434-847-5671 DATE REVISED : 07/12/06

SECTION II - HAZARDOUS INGREDIENTS

REPORTABLE COMPONENTS	CAS NUMBER	VAPOR PRESS.	WT. %

No known hazardous materials.

No SARA reportable components.

SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS

BOILING POINT(°F): N/A
VAPOR DENSITY: Lighter than air.
EVAPORATION RATE: Slower than nBuAc.
OD Not available.
VOLATILE (WT.%): 62.527%

SPECIFIC GRAVITY: .9423
WEIGHT PER GAL.: 7.8466 lb/gl
SOLUBILITY IN WATER: Dispersible.
APPEARANCE: Off-white paste.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT(°F): N/A **METHOD USED: N/A**
FLAMMABLE LIMITS IN AIR (% BY VOL): LOWER: N/A UPPER: N/A

EXTINGUISHING MEDIA: Use foam or water.

SPECIAL FIREFIGHTING PROCEDURES
The use of self-contained breathing apparatus is recommended for fire fighters.

SECTION V - REACTIVITY DATA

STABILITY: Stable.

CONDITIONS TO AVOID: Avoid extremes of heat or cold.

INCOMPATIBILITY (MATERIALS TO AVOID): Incompatible with alkali metals, halogens, and strong acids or bases.

HAZARDOUS DECOMPOSITION OR BYPRODUCTS: Carbon monoxide, carbon dioxide, smoke, and other unidentified organic compounds may be formed during combustion.

HAZARDOUS POLYMERIZATION: Will not occur.

SECTION VI - HEALTH HAZARD DATA

ROUTES OF ENTRY:
Inhalation, skin absorption, ingestion.

INHALATION HEALTH RISKS AND SYMPTOMS OF EXPOSURE
Breathing high concentrations of vapors may cause irritation of the nose and throat or signs of nervous system depression (i.e. - headache, nausea, drowsiness, dizziness, vomiting, loss of coordination and fatigue).

EYE CONTACT HEALTH RISKS AND SYMPTOMS OF EXPOSURE
May cause mild eye irritation.

SKIN ABSORPTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE
This material may cause mild skin irritation. Prolonged or repeated contact or exposure to vapors may cause redness, burning, and drying and cracking of the skin.

INGESTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE
Ingestion may cause irritation of the digestive tract, nausea, vomiting, and signs of nervous system depression.

CARCINOGENICITY: NTP CARCINOGEN: No.
IARC MONOGRAPHS: No.
OSHA REGULATED: No.
No special warnings.

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE
Pre-existing eye, skin, or respiratory disorders may be aggravated by exposure to this product.

EMERGENCY AND FIRST AID PROCEDURES

SKIN: In case of contact, immediately flush skin with plenty of soap and water for at least 15 minutes. Remove contaminated clothing and wash affected areas thoroughly with mild soap. If irritation develops, seek medical attention.

EYES: In case of contact, immediately flush eyes with plenty of water for at least 15 minutes and get medical attention if irritation persists.

INHALATION: If inhaled, remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. Get medical attention.

INGESTION: Get medical attention. If vomiting occurs, keep head lower than hips to prevent aspiration.

== ======= SECTION VII - PRECAUTIONS FOR SAFE HANDLING AND USE ==========

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED
Stop spill/release if it can be done without risk. Wear appropriate protective equipment including respiratory protection as conditions warrant and stay

up' ıd. Prevent material from entering sewers, storm drains, or other natural wa..rways. Dike far ahead of spill for later recovery or disposal. Spilled material may be absorbed into an appropriate absorbent material. Immediate clean-up of any spill is recommended. Notify fire authorities and appropriate federal, state, and local agencies.

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING
Avoid extremes of heat or cold. Keep product containers at normal room temperatures and avoid freezing which will result in irreversible coagulation. Keep product containers closed when not in use. Use and store material in well-ventilated areas away from open flames, heat, hot metal surfaces, and other potential sources of ignition. Store only in approved containers. Personal contact and inhalation should be avoided.

========== SECTION VIII - CONTROL MEASURES ==========

RESPIRATORY PROTECTION: None would generally be required for this product.

VENTILATION: Use only in well-ventilated area.

PROTECTIVE GLOVES: Impermeable gloves.

EYE PROTECTION: Wear safety glasses or goggles to protect against exposure.

OT ł PROTECTIVE CLOTHING OR EQUIPMENT: May use impermeable apron as needed, eye washes, and safety showers.

========== SECTION IX - DISCLAIMER ==========

The information contained herein is based on the data available to us and is believed to be correct. However, Slocum Adhesives Corporation makes no warranty, expressed or implied, regarding the accuracy of these data or the results to be obtained from the use thereof. Slocum Adhesives Corporation assumes no responsibility for injury from the use of the product described herein.

MATERIAL SAFETY DATA SHEET

PRODUCT NAME: C-1064 **HMIS CODES: H F R P**
1 0 0

SECTION I - MANUFACTURER IDENTIFICATION

MANUFACTURER'S NAME: Slocum Adhesives Corp.
ADDRESS : 2500 Carroll Avenue
Lynchburg, VA 24501

EMERGENCY PHONE : 800-424-9300 (CHEMTREC) DATE PRINTED : 10/4/2006
INFORMATION PHONE : 434-847-5671 DATE REVISED : 07/12/06

SECTION II - HAZARDOUS INGREDIENTS

REPORTABLE COMPONENTS	CAS NUMBER	VAPOR PRESS.	WT. %

No known hazardous materials.

No SARA reportable components.

SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS

BOILING POINT(°F): N/A
VAPOR DENSITY: Lighter than air.
EVAPORATION RATE: Slower than nBuAc.
OD . Not available.
VOLATILE (WT.%): 62.527%

SPECIFIC GRAVITY: .9423
WEIGHT PER GAL.: 7.8466 lb/gl
SOLUBILITY IN WATER: Dispersible.
APPEARANCE: Off-white paste.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT(°F): N/A **METHOD USED: N/A**
FLAMMABLE LIMITS IN AIR (% BY VOL): LOWER: N/A UPPER: N/A

EXTINGUISHING MEDIA: Use foam or water.

SPECIAL FIREFIGHTING PROCEDURES
The use of self-contained breathing apparatus is recommended for fire fighters.

SECTION V - REACTIVITY DATA

STABILITY: Stable.

CONDITIONS TO AVOID: Avoid extremes of heat or cold.

INCOMPATIBILITY (MATERIALS TO AVOID): Incompatible with alkali metals, halogens, and strong acids or bases.

HAZARDOUS DECOMPOSITION OR BYPRODUCTS: Carbon monoxide, carbon dioxide, smoke, and other unidentified organic compounds may be formed during combustion.

HAZARDOUS POLYMERIZATION: Will not occur.

SECTION VI - HEALTH HAZARD DATA

ROUTES OF ENTRY:
Inhalation, skin absorption, ingestion.

INHALATION HEALTH RISKS AND SYMPTOMS OF EXPOSURE
Breathing high concentrations of vapors may cause irritation of the nose and throat or signs of nervous system depression (i.e. - headache, nausea, drowsiness, dizziness, vomiting, loss of coordination and fatigue).

EYE CONTACT HEALTH RISKS AND SYMPTOMS OF EXPOSURE
May cause mild eye irritation.

SKIN ABSORPTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE
This material may cause mild skin irritation. Prolonged or repeated contact or exposure to vapors may cause redness, burning, and drying and cracking of the skin.

INGESTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE
Ingestion may cause irritation of the digestive tract, nausea, vomiting, and signs of nervous system depression.

CARCINOGENICITY: NTP CARCINOGEN: No.
IARC MONOGRAPHS: No.
OSHA REGULATED: No.
No special warnings.

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE
Pre-existing eye, skin, or respiratory disorders may be aggravated by exposure to this product.

EMERGENCY AND FIRST AID PROCEDURES

SKIN: In case of contact, immediately flush skin with plenty of soap and water for at least 15 minutes. Remove contaminated clothing and wash affected areas thoroughly with mild soap. If irritation develops, seek medical attention.

EYES: In case of contact, immediately flush eyes with plenty of water for at least 15 minutes and get medical attention if irritation persists.

INHALATION: If inhaled, remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. Get medical attention.

INGESTION: Get medical attention. If vomiting occurs, keep head lower than hips to prevent aspiration.

SECTION VII - PRECAUTIONS FOR SAFE HANDLING AND USE

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED
Stop spill/release if it can be done without risk. Wear appropriate protective equipment including respiratory protection as conditions warrant and stay

up[illegible]nd. Prevent material from entering sewers, storm drains, or other natural wa[illegible]ways. Dike far ahead of spill for later recovery or disposal. Spilled material may be absorbed into an appropriate absorbent material. Immediate clean-up of any spill is recommended. Notify fire authorities and appropriate federal, state, and local agencies.

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING
Avoid extremes of heat or cold. Keep product containers at normal room temperatures and avoid freezing which will result in irreversible coagulation. Keep product containers closed when not in use. Use and store material in well-ventilated areas away from open flames, heat, hot metal surfaces, and other potential sources of ignition. Store only in approved containers. Personal contact and inhalation should be avoided.

========== SECTION VIII - CONTROL MEASURES ==========

RESPIRATORY PROTECTION: None would generally be required for this product.

VENTILATION: Use only in well-ventilated area.

PROTECTIVE GLOVES: Impermeable gloves.

EYE PROTECTION: Wear safety glasses or goggles to protect against exposure.

OT[illegible]R PROTECTIVE CLOTHING OR EQUIPMENT: May use impermeable apron as needed, eye wash[illegible]es, and safety showers.

========== SECTION IX - DISCLAIMER ==========

The information contained herein is based on the data available to us and is believed to be correct. However, Slocum Adhesives Corporation makes no warranty, expressed or implied, regarding the accuracy of these data or the results to be obtained from the use thereof. Slocum Adhesives Corporation assumes no responsibility for injury from the use of the product described herein.

MATERIAL SAFETY DATA SHEET

EXHIBIT XXI 9/7/2007

PRODUCT NAME: C-1263 **NFPA CODES: H F R P 1 0 0 B**

SECTION I - MANUFACTURER IDENTIFICATION

MANUFACTURER'S NAME: Slocum Adhesives Corp.
ADDRESS : 2500 Carroll Avenue
Lynchburg, VA 24501

EMERGENCY PHONE : 800-424-9300 (CHEMTREC) DATE PRINTED : 9/7/2007
INFORMATION PHONE : 434-847-5671 DATE REVISED : 08/24/07

SECTION II - HAZARDOUS INGREDIENTS

REPORTABLE COMPONENTS	CAS NUMBER	VAPOR PRESS.	WT. %
Naphtha 2429 (VM&P) OSHA PEL: 400 ppm ACGIH TLV: 300 ppm TWA	64742-65-7	26.0	5 - 15%

No SARA reportable components.

SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS

BOILING POINT(°F): 258
VAPOR DENSITY: Heavier than air.
EVAPORATION RATE: Faster than nBuAc.
PH: Not available.
VOLATILE (WT.%): 56.199%

SPECIFIC GRAVITY: 1.0072
WEIGHT PER GAL.: 8.387 lb/gl
SOLUBILITY IN WATER: Dispersible.
APPEARANCE: Blue liquid.

SECTION IV - FIRE AND EXPLOSION HAZARD DATA

FLASH POINT(°F): N/A **METHOD USED: N/A**
FLAMMABLE LIMITS IN AIR (% BY VOL): LOWER: N/A UPPER: N/A

EXTINGUISHING MEDIA: Use foam or water.

SPECIAL FIREFIGHTING PROCEDURES
The use of self-contained breathing apparatus is recommended for fire fighters.

SECTION V - REACTIVITY DATA

STABILITY: Stable.

CONDITIONS TO AVOID: Avoid extremes of heat or cold.

INCOMPATIBILITY (MATERIALS TO AVOID): Incompatible with alkali metals, halogens, and strong acids or bases.

HAZARDOUS DECOMPOSITION OR BYPRODUCTS: Carbon monoxide, carbon dioxide, smoke, and other unidentified organic compounds may be formed during combustion.

HAZARDOUS POLYMERIZATION: Will not occur.

SECTION VI - HEALTH HAZARD DATA

ROUTES OF ENTRY:
Inhalation, skin absorption, ingestion.

INHALATION HEALTH RISKS AND SYMPTOMS OF EXPOSURE
Breathing high concentrations of vapors may cause irritation of the nose and throat or signs of nervous system depression (i.e. - headache, nausea, drowsiness, dizziness, vomiting, loss of coordination and fatigue).

EYE CONTACT HEALTH RISKS AND SYMPTOMS OF EXPOSURE
May cause mild eye irritation.

SKIN ABSORPTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE
This material may cause mild skin irritation. Prolonged or repeated contact or exposure to vapors may cause redness, burning, and drying and cracking of the skin.

INGESTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE
Ingestion may cause irritation of the digestive tract, nausea, vomiting, and signs of nervous system depression.

CARCINOGENICITY: **NTP CARCINOGEN: No.**
IARC MONOGRAPHS: No.
OSHA REGULATED: No.
No special warnings.

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE
Pre-existing eye, skin, or respiratory disorders may be aggravated by exposure to this product.

EMERGENCY AND FIRST AID PROCEDURES

SKIN: In case of contact, immediately flush skin with plenty of soap and water for at least 15 minutes. Remove contaminated clothing and wash affected areas thoroughly with mild soap. If irritation develops, seek medical attention.

EYES: In case of contact, immediately flush eyes with plenty of water for at least 15 minutes and get medical attention if irritation persists.

INHALATION: If inhaled, remove to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. If breathing is difficult, give oxygen. Get medical attention.

INGESTION: Get medical attention. If vomiting occurs, keep head lower than hips to prevent aspiration.

SECTION VII - PRECAUTIONS FOR SAFE HANDLING AND USE

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

Stop spill/release if it can be done without risk. Wear appropriate protective equipment including respiratory protection as conditions warrant and stay upwind. Prevent material from entering sewers, storm drains, or other natural waterways. Dike far ahead of spill for later recovery or disposal. Spilled material may be absorbed into an appropriate absorbent material. Immediate clean-up of any spill is recommended. Notify fire authorities and appropriate federal, state, and local agencies.

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

Avoid extremes of heat or cold. Keep product containers at normal room temperatures and avoid freezing which will result in irreversible coagulation. Keep product containers closed when not in use. Use and store material in well-ventilated areas away from open flames, heat, hot metal surfaces, and other potential sources of ignition. Store only in approved containers. Personal contact and inhalation should be avoided.

========== SECTION VIII - CONTROL MEASURES ==========

RESPIRATORY PROTECTION: None would generally be required for this product.

VENTILATION: Use only in well-ventilated area.

PROTECTIVE GLOVES: Impermeable gloves.

EYE PROTECTION: Wear safety glasses or goggles to protect against exposure.

OTHER PROTECTIVE CLOTHING OR EQUIPMENT: May use impermeable apron as needed, eye washes, and safety showers.

========== SECTION IX - DISCLAIMER ==========

The information contained herein is based on the data available to us and is believed to be correct. However, Slocum Adhesives Corporation makes no warranty, expressed or implied, regarding the accuracy of these data or the results to be obtained from the use thereof. Slocum Adhesives Corporation assumes no responsibility for injury from the use of the product described herein.

P.O. Box 11393
Columbia, SC 29211

DUNS NO: 05-397-6551
FED ID NO: 35-1283524

Safety-Kleen.

ORIGINAL INVOICE

EXHIBIT
XX II

PLANTA DE SERVICIO SK:	ESTADO DE IMPUESTOS/NUM.:	FECHA DE FACTURACION:	NO. DE FACTURA
BR Manati		06/15/2006	0017107122
No. TELEFONO:	No. VENDEDOR:	TERMINOS:	
		Net 30	

000033 1 MB 0.326 0033/000033/000036 003 2 6167008
LIFESTYLE FOOTWEAR INC
CARR 125 KM 3.8
P.O. BOX 728
MOCA PR 00676-0728

UBICACION DE SERVICIO:

LIFESTYLE FOOTWEAR INC
CARR 125 KM 3.8
P.O. BOX 728
MOCA , PR 00676

No. DE CUENTA:	No. DE SERVICIO:	No. DE UBICACION:	CODIGO ESPECIAL PARA COBRO:
0009404880	0009404880	961001	003 08

Departamento: 00 **Nombre Del Departamento:**
FECHA DE SERVICIO: 06/07/2006 **No. De Doc. De Servicio:**0017107122 **No. De Orden Compra:**42482
No. De Liberacion: **Transportista:** **No. De Manifiesto:**06005

CANTIDAD	DESC. /NO. DE REFERENCIA	PRECIO	POR	IMPUESTO VENTA	TOTAL DE ARTICULO
1.000	FEE, FUEL SURCHARGE 000100001-00-000000000-0000000	8.0000	EA	0.00	8.00
2.000	FUEL BLEND LIQ >12000 55GL 000088888-52-040146714-0875000 0002304144 USED THINNER	325.0000	DR	0.00	650.00
16.000	FUEL BLEND LIQ >12000 55GL 000088888-52-040146723-0875000 0002304137 LIQUID SHOE GLUE(ADHESIVE)	325.0000	DR	0.00	5,200.00

Logged 6/22/06
Qty Correct
Grn # 575475
S/Cat Ord.
PO# 42482
Ref 00195615

Inv. Rcvd. 6/21/06
Matls. Appr.
Vndr # 02000075
Grn # 02407150
Approval

Comentarios:

FAVOR REMITA ESTA SECCIÓN CON SU PAGO. SIRVASE HACER LAS CORRECIONES NECESARIAS A SU DIRECCION EN CAS DE CAMBIOS. GRACIAS.

LIFESTYLE FOOTWEAR INC, P.O. BOX 728, MOCA, PR 00676

Safety-Kleen.

No. DE CUENTA	No. DE FACTURA	FECHA DE FACTURA	No. DE SERVICIO	CANTIDAD PAGADA
0009404880	0017107122	06/15/2006	0009404880	

0001710712200094048805000079490 93

PO Box 382066
Pittsburgh, PA 15250-8066

AMOUNT DUE
$7,949.09

Customer Name: LIFESTYLE FOOT R INC

Account Number: 0009404880

Invoice Number: **0017107122**

Departamento: 00 **Nombre Del Departamento:**
FECHA DE SERVICIO: 06/07/2006 **No. De Doc. De Servicio:**0017107122 **No. De Orden Compra:**42482
No. De Liberacion: **Transportista:** **No. De Manifiesto:**06005

CANTIDAD	DESC. /NO. DE REFERENCIA	PRECIO	POR	IMPUESTO VENTA	TOTAL DE ARTICULO
3.000	INCINERATE REACT ORGANI 55GL 000088888-52-040146730-0875290 0002304129 SOLVENT WITH ACID (CUSTOMER	492.0300	DR	0.00	1,476.09
41.000	EMPTY PAIL 5 000003306-00-000000000-0000000	15.0000	EA	0.00	615.00
	INVOICE SUBTOTAL				7949.09
	CANTIDAD DE PAGO				**$7,949.09**

RECEIVING REPORT

Lifestyle Footwear, Inc.
Division Rocky Shoes & Boots

016012

Received From: Billy Klein 85738

Date Received: 06/04/06
Our P.O. No. 42482 Shipt No.:
Packing Slip No. 06005 Total Pages:

Write the total amount rec'd in the corresponding box

Cartons	Boxes	Packages	Rolls	Bundles	Skids

Rec'd Via: Dome
(UPS, Fed Exp. Navieras, Allen Trailer, Truck, etc.)
Tracking No.

Partial Shipt. Complete Shipt. ✓

Container No.

Mark with an "X" the type of material received

Raw Matls	Mach. Parts	Mis. Supply	Office Supply	Service Call	Safety Supply

Rec. Rep. prepared by: F. Hancock

Mat'ls physically rec'd by: Rafael Ruiz

Quantity	Item Number	Description	Posted
2		Work Plomb Lead	
16		Work Adhesive	
3		Hom/Canvas Mat (vent)	

White Copy - Accounts Payable Dept. Pink copy - Purchasing file Canary copy - Raw Material Warehouse

LIFESTYLE FOOTWEAR, INC.

EXHIBIT XXII.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 1 oct. 07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*	✓		Se encontro un envase con el embudo.
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 09-26-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*	✓		Se encontro una caja con la tapa abierta.
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 09-17-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 09-10-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 09-03-07

Inspeccionado por / Inspected By: Rafael Rodrigues

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 08-20-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	/	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 08-13-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 6 agosto 07

Inspeccionado por / Inspected By: Rafael Rodrigues

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 30 Julio 07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 7-23-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 16 julio 07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*	✓		Se encontraron unas pailas de 5 gal. fuera de area.
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LAFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 9 Julio 07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 2 Julio 07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*	✓		Debido a que el viernes 29 Junio llovio se encontro un poco de agua en el dique del Hazardous Waste area.
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 25 junio 07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 18 Junio 07

Inspeccionado por / Inspected By: Rafael Rodrigues

		X	J	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 11 Junio 07 **Inspeccionado por / Inspected By:** Rafael Rodrigues

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 4 Junio 07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 29 mayo 07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 05-21-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LUCKY LADY FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 05-14-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*	X		Se encontraron varias pailas de 5gals. que no estaban en las paletas.
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LATEST STYLE
FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 05-07-07

Inspeccionado por / Inspected By: Rafael Rodrigo

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 04/30/07

Inspeccionado por / Inspected By: Yesenia Alvarado

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	The drum has some water because of the rain
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 04-23-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 04-16-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*	X	✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*	X		Vacios envases de 5 galones se estaban bien Organizados, fuera de las paletas
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 04-09-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*	X		Está limpia, pero había algunos paelos de 5 galones que no estaban acomodados debidamente.
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

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FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 03-25-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 03-19-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Están los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close .*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 03-12-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 03-05-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storoge area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 12-26-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 02-19-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 02-12-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*	X		Las lamparas (tubos) estaban en una caja no apropiada.
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 02-05-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Están los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados Check that the *hazardous containers ARE NOT over fill*		✓	

FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 1-29-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers identied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 01-22-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 01-15-07

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 01-08-07 - 12.00pm.

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*	X		Para hoy 8 enero 2007, no han llegado los envases para hechar los desperdicios, estan pedidos dijeron que llegan hoy.
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*	X		hoy 8 enero 07; 12:00 pm. no han llegado los envases para hechar los desperdicios, y se estan pedidos.

01/08

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 12-25-06

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 12-18-06

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 12-11-06

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 12/8/06

Inspeccionado por / Inspected By: A. Medina

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	one tote needs new hazardous label
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 12-01-06

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*	X		Habían 2 envases sin tapa.
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 27 NOV. 06

Inspeccionado por / Inspected By: Rafael Rodrigues

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*	X		Se estuvo haciendo otras tareas
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 11/20/06

Inspeccionado por / Inspected By: F. Alvarado

		X	✓	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	Falta de fechar, se cambio. Empresa Safety Kleen
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 13 Nov. 06

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*	✓		Faltaba poner Etiqueta empty a los pailas vacias.
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 6 Dec. 06

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 30 oct. 06

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 23 oct 06

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*	✗	✓	Dos totes les falta labels
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 16 oct 06 **Inspeccionado por / Inspected By:** Kaylee Ortega

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 9 oct 06

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 10/3/06

Inspeccionado por / Inspected By: America Medina/a.re.

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 25 septiembre 06

Inspeccionado por / Inspected By: Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		√	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		√	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		√	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		√	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		√	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		√	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		√	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		√	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection (Storage Area)

Fecha / Date: 15 septiembre 06 **Inspeccionado por / Inspected By:** Rafael Rodriguez

		X	√	Comments
1)	Verificar escape en contenedores de material peligroso *Check for leaks on Hazardous containers*		✓	
2)	Estan todos los recipientes fechados y marcados apropiadamente? *Are all containers idenfied and dated in a properly way?*		✓	
3)	Estan los recipientes de contenido peligroso en buenas condiciones? *Are the dangerous containers in a good conditions?*		✓	
4)	Verificar que los contenedores con envases peligrosos estan cerrados *Check for Hazardous containers are Close*		✓	
5)	Verificar si hay algun derrame en el area de almacenamiento de material peligroso *Verify is there is some spill on the hazardous waste storage area*		✓	
6)	Verificar si el area de almacenamiento de material peligroso esta limpia *Check if the Hazardous Waste area is clean*		✓	
7)	Verificar que los envases para lamparas fluorescentes estan cerradas y marcadas como "used lamps" *Check if the used lamps containers are closed & labeled as "used lamps"*		✓	
8)	Verificar que los contenedores de materiales peligrosos NO estan sobrellenados *Check that the hazardous containers ARE NOT over fill*		✓	

LIFESTYLE FOOTWEAR, INC.

Hazardous Waste Weekly Inspection
for the storage area

Date 11 septiembre 06

	JJJJ	comments if not O.K.
Check for leaks on Hazardous containers	✓	
Check for label on the Hazardous containers	✓	
Check for Hazardous containers are in Good Condition	✓	
Check for Hazardous containers are Close	✓	
Check for any spill	✓	
Check if the Hazardous Waste area is clean	✓	
Check for the Use Lamps containers are Close & label USE LAMPS	✓	
Check that the Hazardous container are OVER FILL NOT	✓	

Inspected by Rafael Rodriguez

LIFESTYLE
FOOTWEAR, INC.

Hazardous Waste Weekly Inspection
for the storage area

Date 9/5/06

	JJJJ	comments if not O.K.
Check for leaks on Hazardous containers	✓	
Check for label on the Hazardous containers	✓	
Check for Hazardous containers are in Good Condition	✓	
Check for Hazardous containers are Close	✓	
Check for any silt	✓	
Check if the Hazardous Waste area is clean	✓	
Check for the Use Lamps containers are Close & label USE LAMPS	✓	
Check that the Hazardous container are OVER FILL	✓	

Inspected by Rafael Rodriguez

Atlantic OSHA Training Center

INSTITUTO DE EDUCACIÓN AMBIENTAL
San Juan, Puerto Rico

This is to certify that

Irwin Medina Perez

Has successfully completed the course

29 CFR 1910.120(e)(3)(i)
HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE
(40 HOURS TRAINING)
September 17 to 21, 2007

OSHA
Training Center

Carlos M. Padín Bibiloni, Ph.D
Dean
School of Environmental Affairs
Universidad Metropolitana
San Juan, Puerto Rico

Javier Saracho M.
INEDA Director
School of Environmental Affairs
Universidad Metropolitana
San Juan, Puerto Rico

Atlantic OSHA Training Center

INSTITUTO DE EDUCACIÓN AMBIENTAL
San Juan, Puerto Rico

This is to certify that

Rafael Rodríguez Hernández

Has successfully completed the course *RCRA*
In Resources Conservation and Recovery Act
Hazardous Waste Management
(16 hrs)

September 24 and 25, 2007

OSHA
Training Center

José M. Martínez
Instructor

Javier Saracho M.
INEDA Director
School of Environmental Affairs
Universidad Metropolitana
San Juan, Puerto Rico

Atlantic OSHA Training Center

INSTITUTO DE EDUCACIÓN AMBIENTAL
San Juan, Puerto Rico

This is to certify that

Francia Alvarado Lake

Has successfully completed the course *RCRA*
In Resources Conservation and Recovery Act
Hazardous Waste Management
(16 hrs)

September 24 and 25, 2007

OSHA
Training Center

José M. Martínez
Instructor

Javier Saracho M.
INEDA Director
School of Environmental Affairs
Universidad Metropolitana
San Juan, Puerto Rico

EXHIBIT
XXIV

Aisle

EXHIBIT XXV

Atlantic OSHA Training Center

INSTITUTO DE EDUCACIÓN AMBIENTAL
San Juan, Puerto Rico

This is to certify that

Rafael Rodríguez

Has successfully completed the course

29 CFR 1910.120(e)(3)(i)
HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE
(40 HOURS TRAINING)
October 2 to 6, 2006

OSHA Training Center

Carlos M. Padín Bibiloni, Ph.D
Dean
School of Environmental Affairs
Universidad Metropolitana
San Juan, Puerto Rico

Javier Saracho M.
INEDA Director
School of Environmental Affairs
Universidad Metropolitana
San Juan, Puerto Rico

PUERTO RICO MANUFACTURERS ASSOCIATION

SEMINAR PROGRAM

Certifies that

FRANCIA ALVARADO

has attended our seminar on:

Hazardous Waste Operations and Emergency Response
(OSHA 29 CFR 1910-120 / 8 Hours Annual Refresher Training)

And in testimony thereof this certificate is conferred at San Juan, Puerto Rico on August 23, 2006.

Executive Vice-President

Speaker(s)

ASOCIACION DE INDUSTRIALES DE PUERTO RICO

OSHA 900059504

U.S. Department of Labor
Occupational Safety and Health Administration

Francia Alvarado Lake

has successfully completed a 30-hour Occupational Safety and Health Training Course in

General Industry Safety & Health

(Trainer) 6/25/04 (Date)

PUERTO RICO MANUFACTURERS ASSOCIATION

SEMINAR PROGRAM

Certifies that

FRANCIA ALVARADO

has attended our seminar on:

DOT Regulations for the Transportation of Hazardous Materials (HM-126F, HM-181 AND HM-232)

And in testimony thereof this certificate is conferred at San Juan, Puerto Rico on September 6, 2006.

Executive Vice-President

Speaker(s)

ASOCIACIÓN DE INDUSTRIALES DE PUERTO RICO

Estado Libre Asociado de Puerto Rico

Cuerpo de Bomberos de Puerto Rico

Negociado de Adiestramiento

Certificado de Participación

Otorgado a

Inés Echevarría Arce

Curso Básico en Extinción de Incendios

(40 horas)

En testimonio de lo cual este certificado le es conferido hoy, 23 de abril de 2004, en San Juan, Puerto Rico.

Lcdo. Germán Ocasio Morales
Jefe

Cmdte. José A. Cruz Echevarría
Jefe Aux. Negociado de Adiestramiento

Estado Libre Asociado de Puerto Rico

Cuerpo de Bomberos de Puerto Rico

Negociado de Adiestramiento

Certificado de Participación

Otorgado a

Julio López Soto

Curso Básico en Extinción de Incendios

(40 horas)

en testimonio de lo cual este certificado le es conferido hoy, 23 de abril de 2004 en San Juan, Puerto Rico.

Germán Ocasio Morales
Jefe

Cnel. José A. Vázquez Echevarría
Jefe Auxiliar Negociado de Adiestramiento

Estado Libre Asociado de Puerto Rico

Cuerpo de Bomberos de Puerto Rico

Negociado de Adiestramiento

Certificado de Participación

Otorgado a

Daniel Muñiz Rosa

Curso Básico en Extinción de Incendios

(40 horas)

en testimonio de lo cual este certificado le es conferido hoy, 23 de abril de 2004, en San Juan, Puerto Rico.

(f) _____

Germán Ocasio Morales
Jefe

_____

Cnel. José A. Vázquez Feliciano
Jefe Ayte. Negociado de Adiestramiento

Estado Libre Asociado de Puerto Rico

Cuerpo de Bomberos de Puerto Rico

Negociado de Adiestramiento

Certificado de Participación

Otorgado a

Jesús Ruíz Varela

Curso Básico en Extinción de Incendios

(40 horas)

en testimonio de lo cual este certificado le es conferido hoy, 23 de abril de 2004, en San Juan, Puerto Rico.

Germán Osorio Morales
Jefe

Cpdte. José A. Vázquez Feliciano
Jefe Aux. Negociado de Adiestramiento

Atlantic OSHA Training Center

INSTITUTO DE EDUCACIÓN AMBIENTAL
San Juan, Puerto Rico

This is to certify that

Rafael Rodríguez

Has successfully completed the course

29 CFR 1910.120(e)(3)(i)
HAZARDOUS WASTE OPERATIONS AND EMERGENCY RESPONSE
(40 HOURS TRAINING)
October 2 to 6, 2006

OSHA
Training Center

Carlos M. Padín Bibiloni, Ph.D
Dean
School of Environmental Affairs
Universidad Metropolitana
San Juan, Puerto Rico

Javier Saracho M.
INEDA Director
School of Environmental Affairs
Universidad Metropolitana
San Juan, Puerto Rico

EXHIBIT
XXVI

Used Oil 10 gals.Pail