



GrafTech International Holdings Inc.
12900 Snow Road • Parma, Ohio 44130

Juanita Bursley
Senior Manager, Corporate Environmental Risk Management

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juanita.bursley@graftech.com

February 28, 2012

Mr. Brian Sadowski
Project Manager
New York State Department of Environmental Conservation
270 Michigan Ave.
Buffalo, NY 14203-2915

Subject: GrafTech International Holdings Inc. closed landfill site, SWMF #32N03 (formerly Site #932035)

Dear Mr. Sadowski:

Please find attached the requisite Periodic Review Report (PRR) for the subject GrafTech International Holdings Inc. (GTIH) closed landfill site, SWMF #32N03 (formerly Union Carbide Corp., Carbon Products Division and UCAR Republic Site #932035), as requested in your 45-Day Reminder Notice, dated January 15, 2012. This Landfill was closed and capped in 1987, and classified by the state in 1997 as a Class 4 Inactive Hazardous Waste Site. There is no required Remedial Program or remedial objectives established for this site. As requested by the state in March 2009, a proposed Operation, Maintenance and Monitoring (OM&M) Plan was submitted to New York State Department of Environmental Conservation (NYSDEC) Region 9 on September 30, 2009, which was subsequently approved on November 4, 2009. This is the third PRR submitted for this site, the purpose of which is to document GTIH's implementation and full compliance with the OM&M Plan. This report and enclosed certification cover the compliance period between January 1, 2011 and December 31, 2011. PDF files of this cover letter and the PRR were also submitted to you and Mr. Hinton on February 28, 2011.

Please contact me should you have any questions or need additional information regarding the PRR. My contact information is provided above in the letter header.

Sincerely,

Juanita M. Bursley
Senior Manager, Corporate Environmental Risk Management
GrafTech International Holdings Inc.

Enclosures

GrafTech International Holdings Inc. closed landfill site, SWMF #32N03 (formerly Site #932035)
Letter dated February 28, 2012

Cc (Hard Copies Only - Cover Letter, Periodic Review/OM&M Report and PRR IC/EC Certification):

Mr. Steven Bates
New York State Department of Health
Flanigan Square
547 River Street
Troy, NY 12180

Mr. Robert Bucci
3344 Wildwood Dr.
Niagara Falls, NY 14304

Mr. Marty Doster
Hazardous Waste Remediation Engineer, Region 9
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo, NY 14203-2999

Mr. Michael Hinton
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo, NY 14203

Mr. Robert Knizek
Bureau Director
New York State Department of Environmental Conservation
Division of Environmental Remediation, 11th Floor
625 Broadway
Albany, NY 12233-7020

Mr. Greg Sutton
Hazardous Waste Remediation Engineer, Region 9
New York State Department of Environmental Conservation
Division of Environmental Remediation, Region 9
270 Michigan Avenue
Buffalo, NY 14203-2999

GRAFTECH INTERNATIONAL HOLDINGS INC.
(formerly UCAR Carbon Company, Republic Site)

**PERIODIC REVIEW REPORT AND
ANNUAL OPERATION, MAINTENANCE
AND MONITORING REPORT
FOR THE CLOSED LANDFILL SITE
SWMF #32N03
(Formerly UCAR Republic Site Registry No. 932035)**

**PER THE SITE OM&M PLAN
APPROVED ON 11/04/09**

February 28, 2012

PERIODIC REVIEW REPORT AND OPERATION, MAINTENANCE AND MONITORING REPORT

For SWMF #32N03

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ENCLOSURES

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- Enclosure 2 Site Plan Map Showing Locations of Groundwater Monitoring
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- Enclosure 3 Institutional and Engineering Controls Certification Form

1.0 INTRODUCTION AND SITE OVERVIEW

This Periodic Review Report (PRR) is being submitted for the GrafTech International Holdings Inc. (GTIH) (formerly UCAR Carbon Company Inc.) closed landfill facility, SWMF #32N03 (Registry No. 932035) (“Landfill”), under the provisions of the Division of Environmental Remediation (DER) Inactive Hazardous Waste Site Program. The Landfill is located in the Town of Niagara, Niagara County, State of New York, on Parcel # 130.20-1.1. The Landfill is located off of Hyde Blvd. behind the former UCAR Republic Plant. The Landfill was closed and capped in 1987. The Landfill property, which is 61.80 acres, of which 16.48 acres make up the cap, is secured by a metal fence with two (2) locked entrance gates. In 1997, the Landfill was reclassified by the state from Class 2a to a Class 4 Inactive Hazardous Waste Site. **There is no required Remedial Program or remedial objectives for this site.** The purpose of this PRR is to document GTIH’s full implementation and compliance with the post-closure care procedures and institutional/engineering controls contained in the Operation, Monitoring and Maintenance (OM&M) Plan, which was approved by the state on November 4, 2009. The OM&M Plan specifies the routine inspection, maintenance, and groundwater monitor programs, and also describes the requirement for an approved Soil Management Plan (SMP) in the event that GTIH has future plans to excavate soil from the areas outside the footprint of the landfill. This PRR covers the period of January 1, 2011 through December 31, 2011.

2.0 SITE MANAGEMENT

For the report period specified above, GTIH has designated the Sr. Manager, Corporate Environmental Risk Management, to be responsible for managing the Landfill. This position is currently filled by Ms. Juanita M. Bursley, who is located at the Corporate Headquarters at 12900 Snow Road, Parma, Ohio 44130. In addition, GTIH has also contracted the services of Mr. Robert Bucci, a retired former UCAR Carbon manager, to act as the local point-of-contact for the Landfill. Mr Bucci lives in the local Niagara Falls community, and has the responsibility for managing the day-to-day operations at the Landfill, including conducting the scheduled inspections, managing contractors to perform routine sampling and any needed maintenance and/or repairs at the site, responding to neighborhood requests, etc. Mr. Bucci is also responsible for communicating to Ms. Bursley whenever any significant issue arises that could possibly prevent full conformance with the OM&M Plan, or any other important matters concerning the Landfill outside the scope of this Plan. Ms. Bursley has been granted the authority by GTIH to requisition the necessary resources, so that appropriate corrective actions can be promptly implemented to adequately address any identified deficiency and ensure full conformance with the provisions of the OM&M Plan.

3.0 INSPECTION AND MAINTENANCE

The following inspection and maintenance program requirements are included in the state-approved OM&M Plan. In agreement with Mr. Michael Hinton, NYSDEC Division of Environmental Remediation, Region 9, the annual OM&M compliance report is incorporated with this annual PRR. GTIH is presently working with the NYSDEC Division of Environmental Remediation, Region 9, to make the needed modifications to the approved OM&M Plan to convert it to a full Site Management Plan.

1. Weekly Inspections

Weekly visual inspections of the Landfill's security equipment (perimeter fence, gates and locks), cap, monitoring wells, and surrounding areas were conducted, as scheduled, and a record maintained on the standard inspection form, which documents the date and time of the inspection, the inspector's name, and the condition of these facilities, specifically noting any identified deficiency. The inspection record also documented any corrective action(s) taken. Any fence areas that were found damaged were also duly noted on the inspection map.

2. Required New York State Department of Environmental Conservation (NYSDEC) Annual Inspections

Annual visual inspections of the Landfill's monitoring well system (condition of the outer casings, concrete seals and security locks), and the condition of the cap were conducted, as scheduled, and a record maintained on the standard inspection form, which documents the date and time of the inspection, the inspector's name, and the condition of these facilities, specifically noting any identified deficiency. Copies of the annual inspection forms are provided in Enclosure 1.

3. Routine Maintenance and Repairs

The following maintenance and repair activities were conducted per the OM&M Plan:

- a. Repairs were scheduled, as needed, with outside contractor(s) to timely correct any deficiencies discovered during the routine weekly and annual inspections. These included numerous repairs to the perimeter security fencing.
- b. Mowing of the vegetative cover on the Landfill cap and the perimeter lawn of the Landfill and other general care were scheduled, as needed. The cap was mowed a minimum of once per year, starting after September 1, 2011.
- c. General clean-ups of any debris found along the fence line, etc. were performed, as needed, to keep the Landfill area clear of any objectionable or unsightly materials.

4. Recordkeeping

All inspection records are being retained for a minimum period of three (3) years and copies will be made available to the state upon written request.

5. NYSDEC Inspection

No NYSDEC inspection of the Landfill was conducted in 2011. The last NYSDEC on-site inspection of the Landfill was conducted on May 27, 2010. A visual inspection of the integrity of the cap, monitoring wells, perimeter security fencing and access gate was conducted, and no violations were found. GTIH was requested, however, to confirm that concrete seals were in place on several groundwater monitoring well casings, which could not be observed during the inspection, and to repair or replace the seals, as needed. This work was completed and GTIH subsequently provided the NYSDEC with documentation on June 22, 2010, that the seals on these well casings were in place.

In addition, during the site inspection, GTIH requested confirmation from NYSDEC that it was not responsible for monitoring wells GW-10A and GW-10B, which are located outside the perimeter security fencing on neighboring property not owned by GTIH. A records search subsequently conducted by NYSDEC verified that the Department owns and is responsible for these two wells, which were installed for the Preliminary Site Assessment. Therefore, this review confirmed that GTIH is not responsible to monitor or maintain these wells, and also that these wells should not be part of the long-term groundwater quality or water level monitoring program covered under the current OM&M Plan for this site.

4.0 GROUNDWATER MONITORING PROGRAM

The Landfill was capped and closed in 1987. The groundwater monitoring well network at the Landfill site consists of eleven (11) on-site wells. The history of the groundwater monitoring requirements is as follows. Between 1987 and 2000, groundwater monitoring was conducted quarterly. Following their review of the collected groundwater quality data, the New York State Department of Environmental Conservation (NYSDEC), Division of Environmental Remediation and the Division of Solid and Hazardous Materials approved a modified semi-annual sampling program, in a letter dated January 18, 2000, in accordance with the requirements of 6 NYCRR Section 360 to monitor the effectiveness of the solid waste landfill closure in protecting groundwater quality. This new monitoring program was implemented from April 2000 to November 2005. Following a subsequent review of the post-closure groundwater monitoring program and historical groundwater quality data, the NYSDEC Division of Environmental Remediation and the Division of Solid and Hazardous Materials agreed to a modified annual post-closure groundwater monitoring program, which was first implemented in the autumn of 2006. Since that time, the new monitoring program consists of sampling a network of seven (7) of the eleven (11) groundwater on-site wells at the Landfill (specifically, BW-1, BW-2, BW-3, BW-4, MW-3, GW-8B and GW-9B); testing the collected samples by the specified EPA Methodologies for five (5) parameters (Volatile Organic Compounds (VOCs), Total and Dissolved Iron, Potassium and Zinc, Ammonia, Nitrite and Total Kjeldahl Nitrogen (TKN)); and conducting four (4) field measurements for Turbidity, Specific Conductance, pH and temperature. A map of the Landfill showing the locations of the groundwater monitoring wells is provided in Enclosure 2. One sampling event must occur in every calendar year; scheduling of the sampling collection is rotated every year between spring (every odd year) and autumn (every even year). Groundwater elevation measurements are also recorded during each annual sampling campaign.

An annual groundwater sampling campaign was conducted on May 5, 2011. Analytical test results were compared to the New York State Class GA water criteria and to the results of the historical monitoring data for the Landfill; **no discernible negative trend in groundwater quality was observed**. An Annual Monitoring Report is submitted annually to the NYSDEC within six (6) months of the sampling event. The Annual Monitoring Report for the 2011 sampling campaign, including a written summary of the groundwater sampling results, quality assurance/quality control procedures and field logs were prepared and submitted electronically by GTIH's environmental consultant, Conestoga-Rovers & Associates on July 14, 2011. Hard copies were subsequently submitted by GTIH's representative, Mr. Robert Bucci, on August 1, 2011 to Ms. Mary McIntosh, Engineering Geologist II, NYSDEC, Division of Solid and Hazardous Materials, and to other state and local authorities. The analytical laboratory reports were later submitted to NYSDEC upon request. Analytical laboratory reports will be included with all future Annual Monitoring Reports submitted to NYSDEC. This requirement will be incorporated into the new Site Management Plan, which, once approved by NYSDEC, will replace the current OM&M Plan.

SOIL MANAGEMENT PLAN (SMP)

The state has agreed that there is no requirement for a written soil management plan for this Landfill, because there are no immediate plans or anticipation of any future plans to excavate and/or remove soils from the property surrounding the Landfill footprint. However, should this situation change at any time in the future, GTIH must prepare and submit to the NYDEC for approval a written Soil Management Plan a minimum of thirty (30) days prior to commencing such excavation activities. This plan would address the particulars of the planned project. In the event of an unlikely and unforeseen emergency event requiring that GTIH disturb the soils on-site, GTIH would follow all applicable OSHA regulations to protect the workers, would stage the removed soils as close to the excavation site as safely possible, and would contact the NYDEC within forty-eight (48) hours of this event.

5.0 SOIL VAPOR MANAGEMENT

On February 8, 2007, NYDEC approved a modified Work Plan specifying the installation of four (4) soil vapor implants along the south fence line of the Landfill property in order to collect soil gas samples near the residences along Rhode Island Street. These implants were installed on March 8, 2007. On March 26 - 27, 2007, these implants were purged and sampled in accordance with the sample collection criteria in the approved Work Plan. The volume of collected soil vapor at each sampling location was insufficient to analyze the contents in the laboratory. The inability to draw soil vapor from any of the implants suggested that the clay soils are too tight to allow migration of vapors. In May 2007, GTIH submitted a Soil Intrusion Evaluation Report to NYSDEC, which concluded that there is no threat to neighboring residential properties, based on the results of the attempted March 2007 soil vapor sampling event, and recommended that no further action concerning vapor studies was warranted.

On December 28, 2008, the NYSDEC and the New York State Department of Health (NYS DOH) informed GTIH, in writing, that they had reviewed the submitted Soil Intrusion Evaluation Report for the Landfill and determined that the potential for soil vapor intrusion into neighboring homes and businesses had been satisfactorily evaluated. Furthermore, the agencies concurred with GTIH's recommendation that no further action is needed at this site regarding soil vapor intrusion. Therefore, no vapor intrusion monitoring program is required at this Landfill.

7.0 CONCLUSIONS AND RECOMMENDATIONS

All site inspections, monitoring and maintenance activities, and reporting requirements were implemented as required in the OM&M Plan for the Landfill during the certification period. The analytical data from the annual groundwater monitoring event are consistent with the historical data. Engineering controls and associated institutional controls are in place, are performing properly and remain effective. There were no identified deficiencies in the approved institutional/engineering controls (IC/EC) at this site during the certification period, or any recommended improvements that would require changes to the OM&M Plan. However, planned modifications to the OM&M Plan are in progress to transition it to a full Site Management Plan, in accordance with applicable chapters and subsections of the NYS Division of Environmental Remediation, Final DER-10 Technical Guidance for Site Investigation and Remediation (dated May 2010), and to also address past potentially confusing and duplicative reporting requirements.

There are currently no required treatment or mitigation systems at this site, and no indication that any changes are needed. Based on this review, the remedy in place continues to be protective of public health and the environment. The completed IC/EC Certification form is attached (Enclosure 3).

Due to the facts that 1) this Landfill is a Class 4 Inactive Hazardous Waste Site; 2) there is no required Remedial Program or remedial objectives; and 3) the groundwater monitoring program for the past twenty-four (24) years since closure has identified no negative trends in the water quality, GTIH therefore recommends that compliance be maintained with the OM&M Plan (or an approved Site Management Plan) until thirty (30) years post-closure. At that time, an assessment and determination should be made as to whether the Site Management can be discontinued.

ENCLOSURE 1

ANNUAL INSPECTION
FORMS

Robert Bucci, Consultant
3344 Wildwood Dr.
Niagara Falls, New York 14304
Phone 716 297-6772 Cell & 716 628-8208
Email: nia3344@verizon.net

September 30, 2011

Juanita M. Bursley
Corporate Senior Manager, Environmental Protection
Graftech International Holdings Inc.
12900 Snow Road
Parma, Ohio 44130

Subject: Graftech International Holdings Inc.
Landfill #32N03 OM&M Compliance Report

Dear Ms. Bursley

In accordance with your Operation Monitoring and Maintenance Plan I am supplying the following information. I am enclosing a copy of the annual inspection of the wells, locks, casings, seals and the landfill cap and surrounding area.

If you have any questions please call me at (716-628-8208)

Yours truly,

A handwritten signature in black ink, appearing to read 'R. Bucci', with a long horizontal flourish extending to the right.

Robert Bucci
Site Consultant

Encl.

APPENDIX A

INSPECTION OF LANDFILL FENCE, CAP & SURROUNDING AREA

Date	Time	Inspector
9-27-11	9:45 Am	Paul [Signature]

AREA	OK	DAMAGED	DATE REPAIRED	REMARKS
A	✓			
B	✓			
C	✓			
D	✓			
E	✓			
F	✓			
G	✓			
H	✓			
I	✓			
J	✓			

GATE	OK	DAMAGED	DATE REPAIRED	REMARKS
1	✓			
2	✓			
3	✓			

COMMENTS:

CAP CONDITION COMMENTS: (Checking for erosion and vegetation)

CAP WAS CUT during the month of Sept. NO EROSION,
NORMAL VEGETATION.

SURROUNDING AREA:

NO SOIL WAS disrupted, AREA REMAINS NATURAL

APPENDIX B

ANNUAL MONITORING WELL INSPECTION

ID WELL NUMBER	WELL ID TAG INTACT <u>YES/NO</u>	LOCK CONDITION	OUTER CASING CONDITION	CONCRETE SEAL CONDITION	COMMENTS
MW1-78	Yes	Good	Good	Good	
MW2-78	Yes	Good	Good	Good	
MW3-79	Yes	Good	Good	Good	
BW1-86	Yes	Good	Good	Good	
BW2-86	Yes	Good	Good	Good	
BW3-86	Yes	Good	Good	Good	
BW4-86	Yes	Good	Good	Good	
BW5-86	Yes	Good	Good	Good	
BW6-86	Yes	Good	Good	Good	
WW1-86	Yes	Good	Good	Good	
OW1-88	Yes	Good	Good	Good	
OW2-88	Yes	Good	Good	Good	

NYSDEC WELLS

(INSTALLED SEPT/OCT 93)

ID WELL NUMBER	WELL ID TAG INTACT <u>YES/NO</u>	LOCK CONDITION	OUTER CASING CONDITION	CONCRETE SEAL CONDITION	COMMENTS
GW7B-93	Yes	Good	Good	Good	
GW8A-93	Yes	Good	Good	Good	
GW8B-93	Yes	Good	Good	Good	
GW9A-93	Yes	Good	Good	Good	
GW9B-93	Yes	Good	Good	Good	
GW11B-93	Yes	Good	Good	Good	

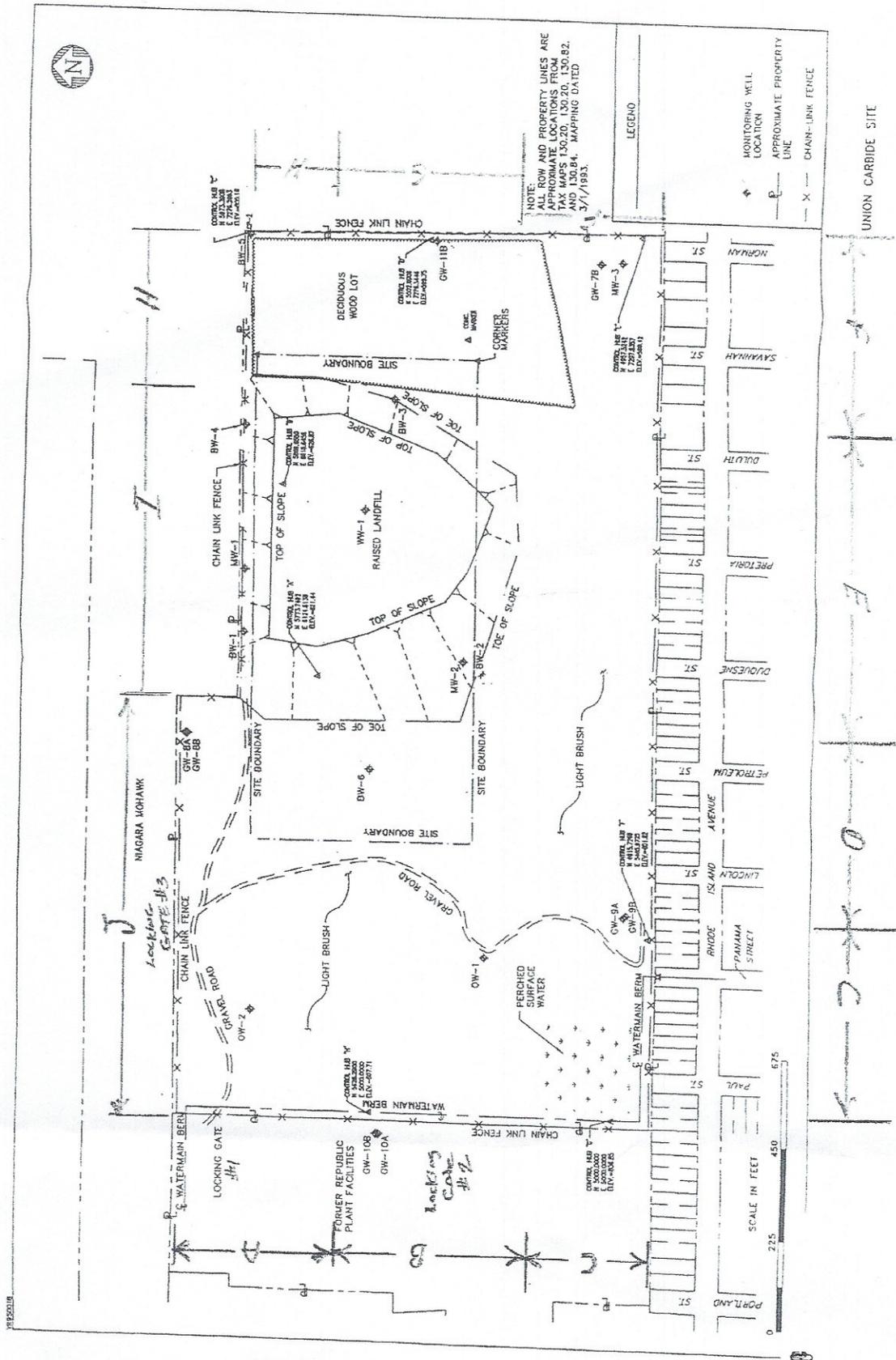
ENTIRE CAP MOWED: Sept. 2011



ENCLOSURE 2

SITE PLAN MAP
SHOWING LOCATIONS OF
GROUNDWATER MONITORING WELLS,
FENCING AND LOCKING GATES

LANDFILL OPERATION MONITORING AND MAINTENANCE MANUAL FOR SWMF #32N03



ENCLOSURE 3

INSTITUTIONAL AND ENGINEERING
CONTROLS CERTIFICATION FORM



Enclosure 2
NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
Site Management Periodic Review Report Notice
Institutional and Engineering Controls Certification Form



Site No.	932035	Site Details	Box 1
Site Name Union Carbide Corp., Carbon Prod. Div.			
Site Address: Hyde Park Boulevard Zip Code: 14303			
City/Town: Niagara			
County: Niagara			
Site Acreage: 61.8			
Reporting Period: January 29, 2011 to January 29, 2012			

- | | YES | NO |
|--|--------------------------|-------------------------------------|
| 1. Is the information above correct? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| If NO, include handwritten above or on a separate sheet. | | |
| 2. Has some or all of the site property been sold, subdivided, merged, or undergone a tax map amendment during this Reporting Period? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 3. Has there been any change of use at the site during this Reporting Period (see 6NYCRR 375-1.11(d))? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 4. Have any federal, state, and/or local permits (e.g., building, discharge) been issued for or at the property during this Reporting Period? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| If you answered YES to questions 2 thru 4, include documentation or evidence that documentation has been previously submitted with this certification form. | | |
| 5. Is the site currently undergoing development? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

- | | YES | NO |
|---|-------------------------------------|--------------------------|
| 6. Is the current site use consistent with the use(s) listed below?
Industrial | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 7. Are all ICs/ECs in place and functioning as designed? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

IF THE ANSWER TO EITHER QUESTION 6 OR 7 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

N/A

Signature of Owner, Remedial Party or Designated Representative

Date

SITE NO. 932035

Box 3

Description of Institutional Controls

<u>Parcel</u>	<u>Owner</u>	<u>Institutional Control</u>
130.20-1-1	GrafTech International Holdings Inc.	Monitoring Plan O&M Plan
130.20-1-1	GrafTech International Holdings Inc.	

Box 4

Description of Engineering Controls

<u>Parcel</u>	<u>Engineering Control</u>
130.20-1-1	Cover System Fencing/Access Control

Engineering Control Details for Site No. 932035

Parcel: 130.20-1-1

Per the revised OM&M Plan dated November 4, 2009, groundwater monitoring and landfill cap maintenance is required.

Periodic Review Report (PRR) Certification Statements

1. I certify by checking "YES" below that:

a) the Periodic Review report and all attachments were prepared under the direction of, and reviewed by, the party making the certification;

b) to the best of my knowledge and belief, the work and conclusions described in this certification are in accordance with the requirements of the site remedial program, and generally accepted engineering practices; and the information presented is accurate and complete.

YES NO

2. If this site has an IC/EC Plan (or equivalent as required in the Decision Document), for each Institutional or Engineering control listed in Boxes 3 and/or 4, I certify by checking "YES" below that all of the following statements are true:

(a) the Institutional Control and/or Engineering Control(s) employed at this site is unchanged since the date that the Control was put in-place, or was last approved by the Department;

(b) nothing has occurred that would impair the ability of such Control, to protect public health and the environment;

(c) access to the site will continue to be provided to the Department, to evaluate the remedy, including access to evaluate the continued maintenance of this Control;

(d) nothing has occurred that would constitute a violation or failure to comply with the ~~Site~~ OM&M Management Plan for this Control; and

(e) if a financial assurance mechanism is required by the oversight document for the site, the mechanism remains valid and sufficient for its intended purpose established in the document.

YES NO

IF THE ANSWER TO QUESTION 2 IS NO, sign and date below and DO NOT COMPLETE THE REST OF THIS FORM. Otherwise continue.

A Corrective Measures Work Plan must be submitted along with this form to address these issues.

N/A

Signature of Owner, Remedial Party or Designated Representative

Date

IC CERTIFICATIONS
SITE NO. 932035

Box 6

SITE OWNER OR DESIGNATED REPRESENTATIVE SIGNATURE

I certify that all information and statements in Boxes 1, 2, and 3 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I BARRY R. JUDD at 12900 SNOW ROAD, PARMA, OHIO 44130
print name print business address

am certifying as OWNER (Owner or Remedial Party)

for the Site named in the Site Details Section of this form.

Barry R. Judd
Signature of Owner, Remedial Party, or Designated Representative
Rendering Certification

2-28-12
Date

IC/EC CERTIFICATIONS

Box 7

Qualified Environmental Professional Signature

I certify that all information in Boxes 4 and 5 are true. I understand that a false statement made herein is punishable as a Class "A" misdemeanor, pursuant to Section 210.45 of the Penal Law.

I JUANITA M. BURSLEY at 12900 SNOW ROAD, PARMA, OHIO 44130
print name print business address

am certifying as a Qualified Environmental Professional for the OWNER
(Owner or Remedial Party)

Juanita M. Bursley
Signature of Qualified Environmental Professional, for
the Owner or Remedial Party, Rendering Certification

N/A
Stamp
(Required for PE)

2/28/12
Date