



Project Name:

Project Date:

Product(s) Supplied:

Questions for Determining Whether Substantial Transformation Has Occurred in the U.S.A.

| Question | Yes | No |
|---|-----|----|
| 1. Were all of the components of the manufactured goods manufactured in the United States, and were all of the components assembled in to the final product in the U.S.? (If the Answer is yes, then this is clearly manufactured in the U.S., and the inquiry is complete) | | X |
| 2. Was there a change in character or use of the good or the components in America? (These questions are asked about the finished good as a whole, not about each individual component) | X | |
| a. Was there a change in the physical and/or chemical properties or characteristics designed to alter the functionality of the good? | X | |
| b. Did the manufacturing or processing operation result in a change of a product(s) with one use into a product with a different use? | X | |
| c. Did the manufacturing or processing operation result in the narrowing of the range of possible uses of a multi-use product? | X | |
| 3. Was/(were) the process(es) performed in the U.S. (including but not limited to assembly) complex and meaningful? | X | |
| a. Did the process(es) take a substantial amount of time? | X | |
| b. Was/(were) the process(es) costly? | X | |
| c. Did the process(es) require particular high level skills? | X | |
| d. Did the process(es) require a number of different operations? | X | |
| e. Was substantial value added in the process(es)? | X | |



MANUFACTURER'S CERTIFICATE OF COMPLIANCE

Subject: Compliance of Determining whether Substantial Transformation has occurred in the U.S.A. per Section 1605 of ARRA-09

Halliday Products, Inc. hereby certifies all products are manufacture at our facility located at 6401 Edgewater Drive in **Orlando, Florida, United States of America**, and comply with section 1605 of ARRA-09 requirements with regard to determining whether substantial transformation has occurred in the U.S.A.

Manufacturing processes preformed on raw materials include the following value adding operations for each product.

ACCESS COVERS: Aluminum tread plate sheets, 1/4" thick, are sheared on a company owned 150 ton shear to the required size for each individual cover requirement. Holes are then punched in the cover panels for hinge mounting and a variety of locking systems. The door panels are then reinforced by welding either aluminum flat bar for 300 lb. rating or aluminum channel for H-20 rating. In another department, the unit's frame sections are cut to size on a double head miter saw. Halliday Products utilizes several proprietary extrusions for our frame members. All extrusions are manufactured in Oldsmar, Florida. After the frame members are cut to size, they are punched for hinge holes. Four frame pieces are then welded together at one of several welding stations. The covers and frames are then moved into an assembly area where the corresponding frames and covers are bolted together at the hinges. Hold open arms, locking systems and a variety of options are then bolted or welded to the frame and cover assemblies. All shearing, punching, machining and welding is performed by Halliday Products personnel using company owned machinery. The finished units are then inspected to insure they are manufactured to the correct size and with the required features and options.

PRODUCTION TIME: Production time for access covers is between 2.5 and 24 man hours depending on size, load rating and job specific option requirements. INTENDED USE: Access covers manufactured by Halliday products are designed to cover openings of various sizes with a reinforced hinged cover plate which allows access to equipment located below the opening. Access covers should not be used for anything other than their intended use.

PORTABLE HOISTS: Schedule 40 stainless steel pipes, in 20 foot lengths are cut to size on saws with an automatic feed feature. The cut pieces of pipe are then moved to a polishing station where a uniform grain is applied with an abrasive belt sander. The cut and polished pieces are then moved to a welding station where the hoist upright and hoist arm is bolted together. Winch plates and stiffeners are then attached. A cable sheave is installed at the end of the hoist arm and the winch is bolted to the assembly. Stainless steel cable with safety hook or shackle is then installed on the winch spool. All cutting, polishing, machining and welding is performed by Halliday Products personnel using company owned



machinery. The finished units are then inspected to insure they are manufactured to the correct size and with the required features and options.

PRODUCTION TIME: Production time for portable hoists is between 3 and 5 man hours depending on job specific option requirements.

INTENDED USE: Portable hoists manufactured by Halliday Products are designed to safely raise and lower equipment (never people) into and out of below grade basins or tanks. Portable hoists should be used for nothing other their intended use.

LADDERS: A proprietary extruded aluminum channel is utilized for the side pieces of the ladders. The side piece extrusion is cut to the required length in a cutting department that utilizes a single head cutoff saw. The side pieces are then moved to a punch that removes a “D” shaped section in the middle of the side pieces at 12” on center. The rung material that is used is a proprietary extruded aluminum shape that is cut to the required length, usually 16” long. Rungs are inserted into the punched area of the two side pieces. The rungs are then continuously welded around the rung perimeter at both ends. Bent and punched aluminum flat bar standoffs of varying lengths are then continuously welded to the side pieces of the ladder. All cutting, punching, bending and welding is performed by Halliday products personnel on company owned machinery. The finished ladder is then inspected to insure weld integrity and correct sizing and standoff length.

PRODUCTION TIME: Production time for ladders is between 1 and 4 man hours depending on ladder length requirements.

INTENDED USE: Ladders manufactured by Halliday Products are designed to allow personnel to climb into and out of basins located above and below ground. Ladders should be used for nothing other than their intended use.

TRASH BASKETS: Aluminum and stainless steel trash baskets and guide rail systems are manufactured in either aluminum or stainless steel. Halliday Products BA or “punched” style baskets are manufactured using .063 aluminum or 16 gage stainless steel sheet metal. The sheet metal blanks are provided by a local sheet metal shop to Halliday Products specifications with regard to hole size and hole location. The sheet metal blanks are then formed on a 150 ton press break. The formed pieces are then moved to a welding station where they are welded together. A rod style lifting bail is then welded to the basket providing a convenient attachment point for lifting cables used to facilitate basket retrieval. Halliday Products heavy duty BB or “bar rack” style baskets are manufactured using ¼ x 2” aluminum or stainless steel flat bars. The flat bars are cut and mitered to the correct size and angle. The mitered flat bars are then welded to the required angle of the finished basket. The mitered flat bar ribs are then placed at the desired spacing and welded to a perpendicular flat bar placed on the front of the ribs and the basket back thereby holding the desired rib spacing. The basket sides are then outfitted with four welded flat bars that the basket wheels are mounted to. The basket sides are welded to the back piece. A lifting bail providing a convenient attachment point for lifting cables is welded to the basket sides. Guide rail systems for both BA and BB trash baskets are manufactured in aluminum or stainless steel. All shearing, cutting, punching and welding is performed by Halliday Products personnel using



company owned machinery. The finished units are then inspected to insure they are manufactured to the correct basket size and guide rail length with the required bar or hole spacing.

PRODUCTION TIME: Production time for trash baskets is between 2 and 8 hours depending on basket size, bar spacing and hole spacing.

INTENDED USE: Trash baskets manufactured by Halliday Products are designed to capture and remove debris before it can be ingested by submersible pumping equipment. Trash baskets should be used for nothing other than their intended use.

TELESCOPING VALVES: Stainless steel telescoping valves with hand wheel are manufactured using 4" square stainless steel tube used for the hand wheel stand. The square tubing, round slip tube and the base plate is cut to a size determined by the project requirements. A lifting bail is fabricated and welded to the top of the slip tube. A connector pipe assembly is welded to one end of the acme rod. A threaded connection is attached at the lifting bail at the other end of the pipe connector assembly. The gusseted square tube stand is welded to the ½" thick, stainless steel base plate. A cast aluminum hand wheel and bearing housing assembly is provided by a local foundry. A brass lifting nut is press fitted into the hand wheel assembly and then attached to the top of the stand. The acme rod is then threaded into the lifting nut/hand wheel assembly. All welding, punching and machining operations are performed by Halliday personnel on company owned machinery. The finished units are then inspected to insure they are manufactured to the correct valve size and travel requirements.

PRODUCTION TIME: Production time for telescoping valves is between 8 and 12 man hours depending on slip tube style and base plate design.

INTENDED USE: Telescoping valves manufactured by Halliday Products are designed to regulate the level of water in various tanks located in wastewater treatment plants. Telescoping valves can also be used to dewater sludge drying beds. Telescoping valves should be used for nothing other than their intended use.

SLIDE/STOP GATES: Aluminum slide & stop gate frames are manufactured using a proprietary aluminum extrusion piece that is manufactured to accept an extruded polymer liner that reduces friction between the gate and the frame work. Slide and stop gates utilize several extrusions used in the gate frame works. All extrusions are manufactured in Oldsmar, Florida. The frame pieces outfitted with the polymer guide are cut to size with one square end and a mitered end. The cut pieces are then welded together to form the three side frame that will contain the aluminum gate. The ¼" thick aluminum gate is sheared to the proper size on a company owned 150 ton shear operated by company personnel. The gate is then reinforced using aluminum stiffeners welded to the plate. The gate is then inserted into the three side frame. All welding cutting and punching operations are performed by Halliday Products personnel on company owned machinery. The finished units are then inspected to insure they have been manufactured with the correct reinforcements and to the proper size.

PRODUCTION TIME: Production time for slide and stop gates is between 2 and 8 hours depending on gate size and if hand wheel assemblies are required.



INTENDED USE: Slide and stop gates manufactured by Halliday Products are designed to help regulate the flow of water between various locations within a wastewater treatment plant. Slide and stop gates should be used for nothing other than their intended use.

RETRO-GRATES: Aluminum Retro-Grate fall through protective panels utilize 1” aluminum I-bar grating and a proprietary extruded aluminum support piece. All extrusions are manufactured in Oldsmar, Florida. The grating panel is cut to the required size. The cut panel is then placed on a hanging rack. A powder coating of safety orange is applied and then baked at 400 degrees for approximately 30 minutes. Aluminum support pieces are designed to capture the grating panel on two sides. Square aluminum tubing is cut to size and captures the grating panel on the remaining two sides. The grating and supports are then welded together. A spring loaded lift handle is then attached to the panel. Two wall mounted support brackets are manufactured using a proprietary aluminum extrusion. The support brackets are cut to size. Mounting holes are drilled and counter sunk. All cutting, welding, and punching and powder coating operations are performed by Halliday Products personnel on company owned machinery and powder coating spray booth and oven. The finished unit is then inspected to insure the Retro-Grate has been welded and sized properly.

PRODUCTION TIME: Production time for Retro-Grates is between 3 and 6 hours depending on size requirements.

INTENDED USE: Retro-Grates manufactured by Halliday Products are designed to provide fall through protection for any existing access cover. Retro-Grates should be used for nothing other than their intended use.

MIXER MAST ASSEMBLIES: Mixer mast assemblies are manufactured using either 2” or 4” stainless steel square tubing. The square tube is cut to the size that is required for the installation. The cut piece of tubing is capped at both ends and outfitted with connecting socket plates, positioning plate, and hoist socket. Mast assemblies are supplied with upper and intermediate wall brackets as well as a pivoting base bracket. All brackets are manufactured using various stainless steel plates and rods that are cut to size, punched for mounting holes, placed in jig fixtures and welded together to form the intended upper, intermediate or base bracket. All welding, punching, cutting and machining is performed using company owned machinery operated by Halliday personnel. The finished mast assembly is then inspected to insure proper sizing and weld integrity.

PRODUCTION TIME: Production time for mixer mast assemblies is between 8 and 10 hours depending on length of mast and the number of wall brackets.

INTENDED USE: Mixer mast assemblies are designed as a guide rail system that submersible mixers are attached allowing for the mixer to be positioned and retrieved for inspection and maintenance. Mixer mast assemblies should be used for nothing other than their intended use.

All of the above products were manufactured from aluminum and stainless steel materials of common lengths, shapes and sizes. Each piece of raw material was transformed as described to complete a quality finished product. Due to the nature and complexities of the processes involved, the required personnel,



cost of machinery used and energy costs, Halliday Products does confirm that it is costly to manufacture our products.

Only trained and experienced personnel are allowed to work on the processes (welding, shearing, punching and assembly) required to complete a finished product.

Based on the above, we conclude that substantial value is added in the manufacturing process of all products manufactured.

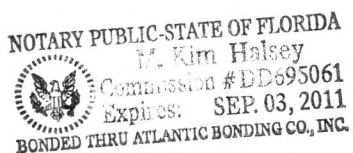
Halliday Products, Inc.

Bill Lovejoy
Vice President

STATE of FLORIDA
COUNTY of ORANGE

Sworn to and subscribed before me, a Notary in and for the State of Florida, by Bill Lovejoy, to me personally known to be Vice President of Halliday Products, Inc., this 29th day of November, 2010.

M. Kim Halsey
Notary Public, State of Florida at Large



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