PHASE I ENVIRONMENTAL SITE ASSESSMENT

Geocel Corporation
53280 Marina Drive
Elkhart, Indiana

Prepared For:

Geocel

Prepared By:

Roberts Environmental Services, LLC
2112 Carmen Court
Goshen, Indiana 46526

RES Project No. 06-10246-10

October 20, 2006

Reference: 27

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Prepared For:

Geocel Holdings Corporation
P.O. Box 398
Elkhart, Indiana 46515

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We declare that, to the best of our professional knowledge and belief, we meet the definition of *Environmental Professional* as defined in §312.10 of 40 CFR 312 and we have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

Jeffrey C. Roberts
Senior Project Manager

David D. Jeffers, L.P.G.
Hydrogeologist

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EXECUTIVE SUMMARY

Roberts Environmental Services, LLC ("RES") performed a Phase I Environmental Site Assessment ("ESA") of the Geocel Corporation facility located at 53280 Marina Drive in Elkhart, Indiana (Figure 1). Operations at the site involve the manufacturing and packaging of sealants, caulks, and adhesives. General processes include product formulation/mixing and packaging into tubes and other containers. A variety of hazardous and non-hazardous chemicals are used and stored at the site. The site consists of a 55,000 square feet production building with two-story offices located in the northwestern portion of the building. The original western portion of the manufacturing building (western two-thirds of the building) was constructed in 1977/1978 and an addition was constructed on the eastern portion of the building (eastern one-third of the building) in 2004/2005. As shown in Figure 2, asphalt-paved areas are located on the west-southwestern, southern, and eastern portions of the approximately 4.78-acre site. The physical setting of the site reportedly consists of loamy sand soils near the surface grading to sands and gravels at depth combined with a relatively shallow ground water table (i.e., approximately 5.0 to 15.0-feet below surface grade). The anticipated ground water flow direction in the area is to the south-southwest.

The objective of this Phase I ESA was to ascertain if areas of recognized environmental conditions are present at the subject site. "Recognized environmental condition" means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water, or surface water of the property. The term includes hazardous substances or petroleum products even under conditions in compliance with laws. The Phase I ESA consisted of (1) a review of historical documents, (2) a visit to observe site conditions, (3) a regulatory records review, and (4) a summary report.

Based on the research and site visit conducted within the scope of this Phase I ESA, recognized environmental conditions were identified in connection with the subject site. The recognized environmental conditions identified are:

- Four (4) underground storage tanks (USTs) were historically located at the southwestern exterior of the building. The USTs were reportedly removed in 1986 and were used to store tetrachloroethylene (PERC), xylene, aromatic hydrocarbons, and a plasticizer. A letter from the UST removal contractor provided to RES by Geocel stated that no visual indications of contamination were observed during the UST removal and the USTs were in "good condition". No soil confirmation sampling and analysis was evidently performed as part of the removal activities. Due to the absence of confirmatory sampling and the coarse-grained nature of the soils in the area, soil and ground water sampling would be necessary within/near the former UST basin to ascertain what, if any, impact the historical USTs have had on the site.

- Large quantities of chemicals and petroleum products are stored and utilized at the site, including tetrachloroethylene (PERC), aromatic hydrocarbons, phthalates, plasticizers, and oils/greases, among others. PERC and aromatic hydrocarbons represent the majority

of the chemicals stored and used at the site. The site is considered a RCRA large quantity generator of hazardous wastes, primarily due to waste toxic materials (PERC) and waste flammable liquids (aromatic hydrocarbons). In general, unless involved in a process at the time, most of the chemicals are stored in four (4) aboveground storage tanks (ASTs) located at the southwestern exterior of the building and ASTs located inside the southwestern portion of the building. The four (4) exterior ASTs consist of two (2) 5,000-gallon PERC ASTs and two (2) 3,000-gallon aromatic hydrocarbon blend ASTs. Bulk ASTs located inside the building primarily contain plasticizers, phthalates, acrylic emulsion, and wastewater. 55-gallon drums of virgin chemicals and empty drums are stored outside along the southern exterior of the building. 55-gallon drums of oils/greases and virgin chemicals are also stored throughout the building interior. Indications of past spills/leaks were observed near the empty drums stored at the southern exterior of the building at the time of the site visit. Full or partially full drums of chemicals or wastes should not be stored outside without providing secondary containment and protection from the elements (i.e., covered so precipitation does not come into contact with the drums). Sampling and analysis would be required to determine whether current and past chemical storage practices have impacted the site.

- Some staining was observed on the concrete floor throughout the chemical storage/mixing area and the mechanical room located in the southwestern portion of the building. A system of sub-grade concrete trenches runs throughout this area, which reportedly collects residual spills in the area. The wastewater in the trenches is then pumped to a 5,000-gallon wastewater AST located in the southwestern portion of the building. The wastewater is periodically transported off-site for disposal. Since chemicals apparently routinely enter the concrete trenches, the trench system should be periodically cleaned and its structural integrity evaluated. If visual inspections identify cracks or other integrity issues, maintenance should be performed and soil sampling and analysis beneath the trenches would be warranted in order to determine if chemicals have migrated beneath the trenches to the underlying soil.

- Staining was also observed near the four (4) exterior ASTs and the exterior remote fill manifold located at the southwestern exterior of the building. Staining was observed on the concrete pavement and on the concrete secondary containment structures around the ASTs and the remote fill manifold. Cracks/seams in the concrete were observed near the stained areas and gravel-covered areas are also located next to portions of the AST secondary containment structure. A slight sheen was observed on accumulated rainwater within the AST secondary containment structure during the site visit. Furthermore, personnel at the site indicate that accumulated rainwater within the AST secondary containment structure was historically pumped onto the ground without treatment. Additionally, it would be prudent to periodically clean and inspect the structural integrity of the secondary containment structures. Due to the long history of chemical storage in this area, staining noted on the concrete near cracks and unpaved areas, and the historical pumping of secondary containment precipitation onto the ground, soil and ground water sampling and analysis would be needed in order to evaluate the possible impacts these practices have had on the site.

- The site previously utilized an underground septic system for wastewater disposal from 1978 to circa 2001. Septic effluent sampling and analysis events conducted in 1992, 1993, and 1998 identified volatile organic compounds (VOCs) in the septic effluent. Some of the VOC constituent concentrations (tetrachloroethylene in 1992 and trimethylbenzenes in 1993) exceeded their respective Indiana Department of Environmental Management (IDEM) Risk Integrated System of Closure (RISC) residential default closure levels (RDCLs) for ground water. While no closure/cleanup levels are currently provided for septic effluent, septic systems discharge directly to the subsurface soil. As such, considering that the three (3) sampling events are a "snapshot" of conditions at the time of sampling (i.e., three sampling events over a 23-year history of usage), soil and ground water sampling and analysis would be necessary to better evaluate the historical septic system's impact on the site.

Other areas of environmental concern observed during the site visit that, in RES's opinion, would be unlikely to invoke a regulatory response or represent an immediate "material threat" to the soil and/or ground water at the site, but could require further action or the collection of additional information, include:

- Since the original portion of the on-site building was constructed before 1981, materials used in its construction may contain asbestos. Some potential ACBMs were observed in the building (i.e., drywall, ceiling tiles, cove base). An asbestos survey by a licensed asbestos inspector would be required to determine if the suspect materials in the building contain asbestos. An asbestos survey is required prior to most demolition or renovation activities by federal and state agencies. Additionally, U.S. Department of Labor Occupational Safety & Health Administration (OSHA) regulations require building and facility owners to notify employers of the presence, location and quantity of asbestos in the building. Employers must then notify employees of this information and possibly provide awareness training to employees that may contact or be exposed to asbestos in the workplace.

- An older, apparently inactive, capped, 1.25-inch diameter water well was observed in the far northern portion of the building. Indiana Department of Natural Resources (IDNR) regulations require water wells to be properly abandoned if they are no longer utilized.

This summary is provide for the reader's convenience and should be considered a part of the appended report. Interpretation of this summary should be considered incomplete without reviewing the Phase I ESA Report 06-10246-10 and associated appendices. The reader is directed to the report text for additional information regarding areas and conditions of potential environmental concern.

1.0 INTRODUCTION

1.1 Purpose

Roberts Environmental Services, LLC ("RES") was retained by Geocel Holdings Corporation to perform a Phase I Environmental Site Assessment (ESA) of the Geocel Corporation ("Geocel") facility located at 53280 Marina Drive in Elkhart, Indiana. The objective of this Phase I ESA was to ascertain if current or historical recognized environmental conditions are present at the site.

1.2 Special Terms and Limiting Conditions of the Assessment

This report was prepared according to the scope of work in RES's September 27, 2006, proposal and in general accordance with the American Society for Testing and Materials (ASTM) Standard E1527-05, *Standard Practice for Environmental Site Assessment: Phase I ESA Process.* RES was authorized to proceed on October 5, 2006, by Mr. Keith Halley of Geocel Holdings Corporation. In accordance with the scope of work, this Phase I ESA did not include soil or water sampling/testing by RES to identify or assess the possible presence of contaminants at the site. This ESA did not include a wetlands determination, asbestos or lead surveys, or radon or mold inspections, nor were samples obtained for geotechnical purposes. The ESA did not include an environmental compliance audit to determine if site activities were subject to, or deficient in, applicable multi-media regulatory requirements. See Section 6.0 of this report for further limitations of the assessment.

1.3 User Information Regarding Environmental Liens or Specialized Knowledge

As specified in the ASTM standard, certain responsibilities lie with the "user" of the assessment, who is defined as the party that intends to use the ASTM guidance to perform an assessment. The "user" is generally the purchaser, owner, lender, property manager, or potential tenant. Under the ASTM standard, it is the responsibility of the "user" to verify whether any environmental liens or activity and use limitations exist with regards to the property and to provide this information to the environmental professional preparing the assessment. Additionally, the "user" must make the environmental professional aware of any specialized knowledge, experience, actual knowledge, and commonly known or reasonably ascertainable information material to "Recognized Environmental Conditions" in connection with the property. The user is also responsible for evaluating the purchase price of the property relative to fair market value of the property if the property was not affected by hazardous substances or petroleum products. The user should attempt to identify an explanation for a purchase price which does not reasonably reflect fair market value if the property were not contaminated, and make a written record of such explanation. Information provided in this regard is presented in the Environmental Records Review Section of this report. Mr. Kerman Peterson, Director of Operations and employee at Geocel for approximately 21 years, and Mr. Don Krable, President and Owner, were interviewed as part of this assessment.

1.4 Previous Environmental Reports

Two (2) previous Phase I ESAs were provided to RES both of which were prepared by Envirocorp Services & Technology, Inc. of South Bend, Indiana. The Phase I ESA dated February 18, 1992, listed several items in the conclusions of the report, including the former presence of underground storage tanks (USTs) at the site and large amounts of chemicals stored at the site. The Phase I ESA dated December 1998 listed several Recognized Environmental Conditions in connection with the property, including: floor drains from the laboratory exiting to the septic system; former USTs at the site; contaminants detected in the septic tank during sampling events; and the presence of large quantities of chemicals at the site.

2.0 SITE DESCRIPTION

2.1 Site Location

The site is located at 53280 Marina Drive in Elkhart, Indiana (Figure 1). The building at the site reportedly encompasses approximately 55,000 square feet. The site is part of the northeast ¼ of Section 26, Township 38 North, Range 5 East, Osolo Township, Elkhart County, Indiana. The site is identified as Parcel No. 20-02-26-251-001.000-026 and encompasses a total of approximately 4.78-acres. The approximate geographic coordinates of the middle of the site are 41.7199° North and -85.9160° West (NAD83). The location of the site is depicted in Figure 1 (Appendix A).

2.2 Site and Vicinity Characteristics

The subject site is located in an area used primarily for manufacturing purposes. The topography of the site vicinity is generally flat with a slight slope to the south-southeast. The site has an approximate elevation of 770 feet above mean sea level (USGS Topographic Map – Elkhart, Indiana).

2.3 Description of the Site

The site consists of a 55,000 square feet production building with two-story offices located in the northwestern portion of the building. The original western portion of the manufacturing building (western two-thirds of the building) was constructed in 1977/1978 and an addition was constructed on the eastern portion of the site (eastern one-third of the building) in 2004/2005. The areas immediately south and east of the building are asphalt-paved, while the primary parking area for the building is located at the asphalt-paved area to the southwest of the building. Concrete-paved recessed loading docks are located at the southern and eastern exterior of the building. The southwestern, southern, and eastern portions of the site are fenced. A drainage swale is located along the eastern and southern portions of the site. The far northern and northwestern portions of the site are grass-covered with some trees and landscaping. A 2005 aerial photograph showing the site is provided as Figure 2 in Appendix A and a facility evacuation plan detailing the layout of the building interior is also included in Appendix A.

2.4 Current Uses of the Site

Operations at the site involve the manufacturing and packaging of sealants, caulks, and adhesives. General processes include product formulation/mixing and packaging into tubes and other containers. A variety of hazardous and non-hazardous chemicals are used and stored at the site.

2.5 *Past Uses of the Site*

Based on a review of Elkhart County Auditor's records, Elkhart County Recorder's archives, interviews with persons familiar with the site, and historical aerial photographs, the site has apparently been used for industrial purposes since the original western portion of the building was built in 1977/1978. It appears the site was either vacant or used for agricultural purposes (i.e., row cropping) before this time. Additional discussions regarding past uses of the site are provided in the Historical-Use Information portion of this report, contained in Section 3.3.

Prior Ownership. Prior site ownership was researched through records at the Elkhart County Auditor's Office and Recorder's Office with no data gaps encountered until data failure in 1915. The current owner of the site is Geocel Holdings Corporation, which acquired the site in September 2000. The following table lists the historical ownership as defined utilizing readily available records:

HISTORICAL OWNERSHIP	
Owner	**Ownership Dates**
Geocel Holding Corporation	September 2000 to Present
Geocel Limited, Inc.	September 1977 to September 2000
Allan Ludwig & David Miller	August 1977 to September 1977
Newberry & Faye Cooper	April 1937 to August 1977
Federal Land Bank of Louisville	February 1933 to April 1937
Eva Brown	September 1927 to February 1933
Ollie Sowers	October 1922 to September 1927
Charles Fisher	March 1921 to October 1922
John Grames	*Before 1915 to March 1921

* Further Data Not Practically Reviewable or Data Failure

2.6 *Uses of Adjoining Properties*

Current uses of adjoining properties were assessed via visual reconnaissance from the subject site and from information obtained from record reviews. The subject site is located within a manufacturing area. Manufacturing properties are located north (across Cooper Drive), south, east, and west (beyond Marina Drive) of the site and are detailed on Figure 2 in Appendix A.

3.0 PHYSICAL SETTING & ENVIRONMENTAL RECORDS REVIEW

3.1 Physical Setting

Information regarding the physical setting of the property was obtained from the site reconnaissance on October 13, 2006, a review of the USGS topographic map, the Indiana Department of Natural Resources (IDNR), and the Soil Survey of Elkhart County. Information regarding the adjoining properties was obtained by visual reconnaissance from the subject site and information obtained from record reviews.

Site Soils and Geology. According to the *Soil Survey of Elkhart County, Indiana* (U.S. Department of Agriculture (USDA), 2000), surficial soils on the site consist of the urban land subsection of the Brems Complex (UdoA). Urban land designated soils have been reworked to the extent that they may no longer match the typical type-section description. However, Brems Series soils are described as a loamy sand that formed from glacial outwash deposits. These soils are gently sloping and occupy swells and outwash plains. Dark brown loamy sands exist in the top 27-inches of soil. The soil progressively becomes sandier at depths beyond the surficial loamy sands. Brems soils are moderately well-drained with a low available water capacity.

Surficial geology in the general vicinity of the site is represented by outwash deposits of gravel, sand, and silt (Schneider and Keller, 1972). These sediments are associated with the outwash facies of the Atherton Formation in Indiana. Bedrock subcrops at an approximate depth of 175 feet beneath the surficial unconsolidated deposits and consists of Sunbury and Ellsworth Shales.

Site Hydrogeology. According to *Water Resources Availability in the St. Joseph River Basin, Indiana* (Indiana Department of Natural Resources - IDNR, 1987), the site is located within the St. Joseph Aquifer System. According to IDNR well logs in the area, the depth to ground water at the site is approximately 5.0 to 15.0 feet below surface grade. The regional and local ground water flow direction is likely south-southwesterly towards the St. Joseph River, which is located approximately 1.5-miles south of the site. Production wells in the area or other local subsurface anomalies may also affect the ground water flow direction. The St. Joseph Aquifer System consists of thick sand and gravel deposits that have excellent ground water availability (100 to 1,500 gallons per minute (gpm)). According to IDNR, the St. Joseph Aquifer is susceptible to contamination and is a U.S.EPA designated sole-source aquifer.

3.2 Standard Environmental Record Sources, Federal, State and Local

RES contracted Environmental Data Resources, Inc. (EDR) to perform the initial database records search (Appendix B). Due to insufficient and/or inaccurate information, some sites may have unmappable addresses ("orphan" sites); however, the federal and state databases were also searched by the subject property's zip code and by city and county. If any orphan sites were indicated by the search, an orphan-sites list was also generated and reviewed.

Federal. The federal ASTM databases searched, their respective search distances, and number of facilities identified in each database are presented in the following table:

FEDERAL ASTM DATABASES SEARCHED		
ASTM Database	**Search Distance (Miles)**	**Number of Facilities per Database**
National Priority List (NPL)	1.0	0
Proposed NPL	1.0	0
Comprehensive Environmental Response, Compensation, and Liability Information Systems (CERCLIS)	0.5	0
CERCLIS No Further Remedial Action Planned (CERC-NFRAP)	0.25	0
Corrective Action Report (CORRACTS)	1.0	0
Resource Conservation and Recovery Information System – Treatment, Storage, and Disposal Facilities (RCRIS-TSDs)	0.5	0
RCRIS-Large Quantity Generators (RCRIS-LQG)	0.25	1
RCRIS-Small Quantity Generators (RCRIS-SQG)	0.25	4
Emergency Response Notification Systems (ERNS)	0.125	0

The site was listed on the RCRA-LQG database in the EDR FieldCheck® Report. The site was also listed on the FINDS database, which is a "pointer" database and is often associated with facilities with present or past air permits (see ECHD section below). The site is listed as a RCRA large quantity generator with some minor violations, primarily transportation and manifesting violations. Mr. Kerman Peterson provided RES with summaries of hazardous waste streams generated at the site which include waste toxic materials and waste flammable liquids.

Four (4) off-site facilities were listed within the specified search radii the federal databases. All four (4) of these facilities were listed on the RCRA-SQG database with no reported violations or releases. As such, they represent a low environmental concern.

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State. The state ASTM databases searched, their respective search distances, and number of facilities identified in each database are presented in the following table:

STATE ASTM DATABASES SEARCHED

ASTM Database	Search Distance (Miles)	Number of Facilities per Database*
State Hazardous Waste (SHW) Facilities	1.0	0
State Landfill Facilities	0.5	0
Leaking Underground Storage Tanks (LUSTs)	0.5	0
Underground Storage Tanks (USTs)	0.25	0
Voluntary Remediation Program (VCP) List	0.5	0

The site was not listed on any of the state databases. Additionally, no off-site facilities were listed on the state databases (only manifest listings related to the RCRA status of the previously mentioned facilities).

Elkhart County Health Department/MACOG. A records request was submitted to the Elkhart County Health Department (ECHD) for environmental information relating to the site and immediately adjacent properties. Elkhart County Ground Water Protection Ordinance (GWPO) inspections were conducted at the site in April 2005, February 2000, January 1999, July 1997, July 1995, December 1993, and January 1992. Ground Water Protection Program (GWPP) inspections were also conducted by ECHD in August 1986 and September 1985, while septic system sampling and analysis occurred in October 1998, March 1993, and April 1992. No significant violations were noted during any of the inspections. However, the inspection forms noted large quantities of chemicals stored at the site during each inspection. Additionally, volatile organic compounds (VOCs) were identified in all three (3) septic sampling and analysis events. The tetrachloroethylene concentration of 5.8 micrograms per liter (ug/l) identified in the 1992 septic sample is greater than the Indiana Department of Environmental Management (IDEM) Risk Integrated System of Closures (RISC) residential default closure level (RDCL) of 5.0 ug/l for tetrachloroethylene in ground water. Trimethylbenzenes (1,3,5- and 1,2,4-) were also identified at concentrations greater than the IDEM RISC RDCLs for ground water in the 1993 septic sample. Records were also on-file regarding IDEM Industrial Waste Management and multi-media compliance inspections at the site. Some apparently minor violations were noted during the inspections. Follow-up inspections or letters indicated that these violations were corrected. Documentation related to Geocel's air permitting status (exempt from permitting) was also on-file at the ECHD. Select ECHD documents are provided in Appendix C.

Numerous records for facilities in the immediate vicinity of the site were on-file at the ECHD. Some apparently minor GWPO inspection violations (storage and secondary containment violations) were noted at these facilities. However, no indications of significant contamination or releases were on-file for the immediate area. The 1999 Michiana Area Council of Governments (MACOG) map of "Elkhart County Potential Groundwater Contamination Sites" does not depict any known sources of ground water contamination in the immediate site vicinity.

Assessment of Potential Off-Site Contamination. An assessment of the effect off-site facilities could potentially exert on the site is interpretive and is based on available state and federal regulatory database/file information (reported events) that may not have been recently updated; general assumptions concerning surface topography, drainage and groundwater flow; and other available information. An assessment of whether unreported releases have occurred or an evaluation of additional investigation required at the identified facilities is beyond the scope of this assessment. The primary means to determine if documented or undocumented off-site sources of contamination have impacted the subject site is through soil and ground water sampling and analysis.

Based on our review of available data, and relying on the identified assumptions, there appears to be a low probability of significant off-site contamination affecting the subject site.

3.3 Historical-Use Information

The historical-use data evaluation consisted of a review of historical aerial photographs for the site and vicinity.

Aerial Photographs. Aerial photographs were reviewed to assess prior land use and identify possible evidence of processes, facilities, or surface features that suggest storage or disposal of waste materials. Aerial photographs of the site and site vicinity dated 2005, 2002, and 1998 were viewed on the Internet at the MACOG GIS website. Copies of 1993, 1977, and 1965 aerial photographs showing the site were reviewed at the Elkhart County Surveyor's Office. A 1986 aerial photograph was obtained from the Elkhart County Planning Department, while copies of aerial photographs taken in 1992, 1987, 1973, 1957, and 1938 were reviewed at the Elkhart County USDA Natural Resource Conservation Service (NRCS) office. A copy of the 2005 aerial photograph showing the approximate site boundaries is provided as Figure 2 in Appendix A.

The 2005 aerial photograph depicts primary site features as being substantially similar to those observed during the site reconnaissance. Only the original western portion of the building is visible in the 2002 through 1986 aerial photographs, while the property appears vacant or used as cultivated fields in the 1977 and earlier aerial photographs.

The 2002, 1998, 1993, and 1986 aerial photographs depict a ground disturbance east of the building. Mr. Peterson indicated that this was a brush pile that was eventually cleaned-up. The 1993 aerial photograph depicts a similar ground disturbance south of the brush pile on the southeastern portion of the site, which may be another brush pile that is shown on a map in the 1992 Envirocorp Phase I ESA. Exterior drum storage is also visible in the 1993 aerial photograph on the southeastern portion of the site (i.e., far eastern portion of asphalt drive area). The four (4) present-day ASTs are visible in the 2005 through 1987 aerial photographs only.

The aerial photograph review identified the presence of exterior drum storage. RES's inspection and assessment of potential concerns associated with this review is limited by the scale and

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quality of the aerial photographs viewed. Due to the scale and clarity of the aerial photographs, specific site features with potential environmental significance may not have been discernible. Data gaps in the aerial photography record are noted between 1978 and 1985 (no aerial photographs available), but are less significant between 1986 and present-day (seven aerial photographs available). However, Mr. Krable verified that similar operations occurred at the site during the timeframe between 1978 and 1985, including exterior drum storage on the southeastern portion of the site. It is the opinion of the Environmental Professional that the absence of aerial photographs during the initial years of operation at the site does not constitute a significant data gap.

Sanborn® Fire Insurance Maps. No Sanborn® Fire Insurance Map coverage was available for this portion of Elkhart.

4.0 INFORMATION FROM SITE RECONNAISSANCE

The following is a summary of information from the site reconnaissance conducted by RES on October 13, 2006. Photographic documentation of the site reconnaissance is provided in Appendix D. Mr. Kerman Peterson accompanied RES throughout the majority of the site visit.

4.1 Hazardous Substances in Connection with Identified Uses

Large quantities of chemicals are stored and utilized at the site including bulk storage tanks, 55-gallon drums, and smaller containers or packages of adhesives, caulks, plasticizers, and oils/greases. As described in Section 3.2, the site is considered a RCRA large quantity generator of hazardous wastes, primarily due to waste flammable liquids and solvents associated with the bulk storage (see Storage Tanks section below) of tetrachloroethylene and aromatic hydrocarbons solvents. Numerous empty drums are also staged outside on the southern asphalt-paved driveway. Some full drums of plasticizer were also stored in this area. A complete inventory of all of the chemicals used and stored at the site was beyond the scope of this assessment. The empty drums and the new drums were stored outside without secondary containment and were exposed to the elements. Full or partially full drums of chemicals or wastes should not be stored outside without providing secondary containment and protection from the elements (i.e., covered so precipitation does not come into contact with the drums). The drums appeared to be in good condition. An area of staining was observed on the asphalt near the empty drums within an area of deteriorated asphalt. Mr. Peterson stated that this area of staining/deteriorated asphalt may have been caused by the spillage/leakage of automotive fluids from a truck typically parked at this location.

4.2 Containers of Unidentified Substances

No containers of unidentified substances were observed at the site.

4.3 Storage Tanks

Several aboveground storage tanks (ASTs) were observed at the site. Most notably, two (2) 5,000-gallon ASTs of tetrachloroethylene (PERC) and two (2) 3,000-gallon ASTs of aromatic hydrocarbon blend are located within a concrete secondary containment structure near the southwestern exterior of the building. A slight sheen was observed on accumulated rainwater within the AST secondary containment structure during the site visit. Several large ASTs (up to 5,000-gallons) of other process chemicals (phthalates, acrylics, plasticizers) and wastewater are also located inside the southwestern portion of the building. Stained areas were observed on the concrete/asphalt throughout the southwestern interior of the building and at the southwestern exterior of the building near the exterior ASTs and their associated fill ports and the exterior remote fill manifold system for the interior ASTs. Cracks and/or seams in the concrete and a gravel-covered area around portions of the AST secondary containment structure could allow chemical spills to migrate to the underlying soils. Mr. Peterson stated that until approximately

2000 the water inside the secondary containment unit was historically pumped on to the ground after facility personnel visually inspected the water for sheening. The accumulated precipitation in the AST secondary containment unit is now periodically pumped by a contractor and disposed of off-site.

Four (4) 6,000-gallon underground storage tanks (USTs) were previously located at the southwestern exterior of the building. The USTs were reportedly removed in 1986 and historically contained tetrachloroethylene (PERC), xylene, aromatic hydrocarbon solvent, and a plasticizer. UST removal documentation prepared by the UST removal contractor (A-1 Disposal Corporation) provided to RES by Mr. Peterson, indicated that "upon visual inspection we did not detect any evidence of leakage and found said tanks to be in good condition". Apparently, no soil sampling and analysis was conducted during the removal activities. A copy of the letter is provided in Appendix E. Mr. Krable also stated that the tanks appeared to be in good physical condition when they were removed.

4.4 Asbestos-Containing Building Materials (ACBMs)

A survey of asbestos-containing building materials (ACBMs) is not within the ASTM Phase I ESA scope. Since the original portion of the building was constructed before 1981, materials used in its construction may contain asbestos. The only means to verify the presence or absence of asbestos is through bulk sampling by a licensed asbestos inspector and laboratory analysis. An asbestos survey is required prior to most demolition or renovation activities by federal and state agencies. Additionally, U.S. Department of Labor Occupational Safety & Health Administration (OSHA) regulations require building and facility owners to notify employers of the presence, location and quantity of asbestos in the building. Employers must then notify employees of this information and possibly provide awareness training to employees that may contact or be exposed to asbestos in the workplace.

4.5 Utilities

Elkhart municipal sewer and water are provided to the site. Municipal sewer service was connected to the site in circa 2001. However, a septic system was previously utilized at the site and was reportedly located on the west-northwestern portion of the site. As previously mentioned in Section 3.2, some VOC constituents were identified in the septic system during sampling conducted in 1998, 1993, and 1992. Mr. Peterson stated that approximately four (4) floor drains in the manufacturing area were permanently plugged at some point in the past.

Municipal water was reportedly connected to the site in circa 1990. However, a private water well is still utilized at the site for irrigation purposes only. The water well is located along the northern exterior of the building. Another, apparently older, capped, 1.25-inch diameter water well was observed in the northern interior of the building. Indiana Department of Natural Resources (IDNR) regulations require that unused water wells be properly abandoned by a licensed Water Well Driller.

4.6 Miscellaneous Observations

A series of sub-grade concrete trenches were observed throughout the chemical storage/mixing area and the mechanical room located in the southwestern portion of the building. The trenches reportedly collect residual spills in the area. The trenches drain to a sump area where the accumulated liquids are pumped to a 5,000-gallon wastewater AST located in the southwestern portion of the building. The wastewater is periodically disposed of off-site on an as-needed basis by a waste disposal contractor.

5.0 FINDINGS AND CONCLUSIONS

Roberts Environmental Services, LLC ("RES") was retained by Geocel Holdings Corporation to perform a Phase I Environmental Site Assessment (ESA) of the Geocel Corporation facility located at 53280 Marina Drive in Elkhart, Indiana. The Phase I ESA was performed in substantial conformance with the scope and limitations of the ASTM Standard Practice E1527-05 with limitations on the materials reviewed, as described in RES's September 27, 2006, proposal.

Based on the research and site visit conducted within the scope of this Phase I ESA, recognized environmental conditions were identified in connection with the subject site. The recognized environmental conditions identified are:

- Four (4) underground storage tanks (USTs) were historically located at the southwestern exterior of the building. No soil confirmation sampling and analysis was evidently performed as part of the removal activities in 1986. Due to the absence of confirmatory sampling and the coarse-grained nature of the soils in the area, soil and ground water sampling would be necessary within/near the former UST basin to ascertain what, if any, impact the historical USTs have had on the site.

- Large quantities of chemicals are stored and utilized at the site, including tetrachloroethylene (PERC), aromatic hydrocarbons, phthalates, plasticizers, and oils/greases, among others. PERC and aromatic hydrocarbons represent the majority of the chemicals stored and used at the site. In general, unless involved in a process at the time, most of the chemicals are stored in four (4) aboveground storage tanks (ASTs) located at the southwestern exterior of the building and ASTs located inside the southwestern portion of the building. The four (4) exterior ASTs consist of two (2) 5,000-gallon PERC ASTs and two (2) 3,000-gallon aromatic hydrocarbon blend ASTs. Bulk ASTs located inside the building primarily contain plasticizers, phthalates, acrylic emulsion, and wastewater. 55-gallon drums of virgin chemicals and empty drums are stored outside along the southern exterior of the building. 55-gallon drums of oils/greases and virgin chemicals are also stored throughout the building interior. Indications of past spills/leaks were observed near the empty drums stored at the southern exterior of the building at the time of the site visit. Full or partially full drums of chemicals or wastes should not be stored outside without providing secondary containment and protection from the elements (i.e., covered so precipitation does not come into contact with the drums). Subsurface sampling and analysis would be needed to assess possible impacts to the site from current and historical chemical storage practices.

- Some staining was observed on the concrete floor throughout the chemical storage/mixing area and the mechanical room located in the southwestern portion of the building. A system of sub-grade concrete trenches runs throughout this area, which reportedly collects residual spills in the area. The wastewater in the trenches is then pumped to a 5,000-gallon wastewater AST located in the southwestern portion of the building. The wastewater is periodically transported off-site for disposal. Since

chemicals apparently routinely enter the concrete trenches, the trench system should be periodically cleaned and its structural integrity evaluated. If visual inspections identify cracks or other integrity issues, maintenance should be performed and soil sampling and analysis beneath the trenches would be warranted in order to determine if chemicals have migrated beneath the trenches to the underlying soil.

- Staining was also observed near the four (4) exterior ASTs and the exterior remote fill manifold located at the southwestern exterior of the building. Cracks/seams in the concrete were observed near the stained areas and gravel-covered areas are also located next to portions of the AST secondary containment structure. A slight sheen was observed on accumulated rainwater within the AST secondary containment structure during the site visit. Furthermore, personnel at the site indicate that accumulated rainwater within the AST secondary containment structure was previously pumped onto the ground without treatment. Additionally, it would be prudent to periodically clean and inspect the structural integrity of the secondary containment structures. Due to the long history of chemical storage in this area, staining noted on the concrete near cracks and unpaved areas, and the historical pumping of secondary containment precipitation onto the ground, soil and ground water sampling and analysis would be needed in order to evaluate the possible impacts these practices have had on the site.

- The site previously utilized an underground septic system for wastewater disposal from 1978 to circa 2001. Septic effluent sampling and analysis events identified VOC constituent concentrations (tetrachloroethylene in 1992 and trimethylbenzenes in 1993) that exceeded their respective IDEM RISC RDCLs for ground water. Considering that the three (3) sampling events are a "snapshot" of conditions at the time of sampling (i.e., three sampling events over a 23-year history of usage), soil and ground water sampling and analysis would be necessary to better evaluate the historical septic system's impact on the site.

Other areas of environmental concern observed during the site visit that, in RES's opinion, would be unlikely to invoke a regulatory response or represent an immediate "material threat" to the soil and/or ground water at the site, but could require further action or the collection of additional information, include:

- Since the original portion of the on-site building was constructed before 1981, materials used in its construction may contain asbestos. Some potential ACBMs were observed in the building (i.e., drywall, ceiling tiles, cove base). An asbestos survey by a licensed asbestos inspector would be required to determine if the suspect materials in the building contain asbestos. An asbestos survey is required prior to most demolition or renovation activities by federal and state agencies. Additionally, U.S. Department of Labor Occupational Safety & Health Administration (OSHA) regulations require building and facility owners to notify employers of the presence, location and quantity of asbestos in the building. Employers must then notify employees of this information and possibly provide awareness training to employees that may contact or be exposed to asbestos in the workplace.

020

- An older, apparently inactive, capped, 1.25-inch diameter water well was observed in the far northern portion of the building. Indiana Department of Natural Resources (IDNR) regulations require water wells to be properly abandoned if they are no longer utilized.

020 A

6.0 LIMITATIONS

The services, data, and opinions of Roberts Environmental Services, LLC (RES) performed for and expressed in this report are for the sole and exclusive use of Geocel Holdings Corporation. Reliance by any third party on the facts, conclusions, and recommendations in this report is not contemplated. The scope of services for this project may not be appropriate for the needs of others, and the use or re-use of this document and the findings, conclusions, or recommendations expressed herein by any third party is at their sole risk.

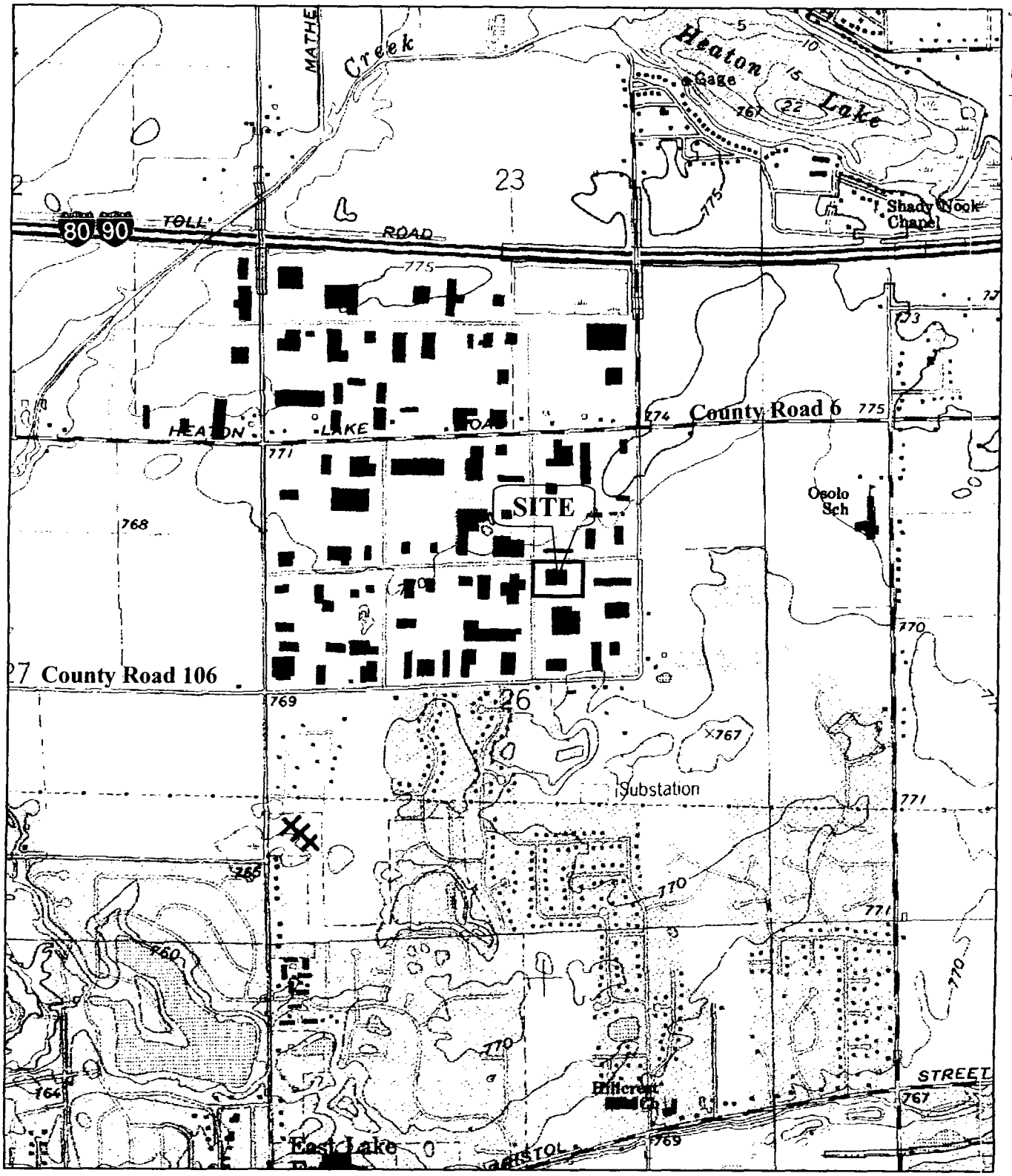
In performing this investigation, RES warrants that it has conformed to generally accepted principles and practices of consultants conducting similar investigations in the same geographic area. This warranty is in lieu of all others, either expressed or implied. Although the opinion provided by RES in this report has been rendered in accordance with generally accepted professional standards, this opinion cannot be construed as a guarantee or warranty as to the potential liabilities or impacts associated with the site. The investigation is limited to the specific project, property, and date of RES's site visit, as described in this report, and its findings should not be relied upon by any party to represent conditions at other times or properties. The investigation described in this report was also conducted within the context of agency rules, regulations, and enforcement policies in effect at the time of its execution; later changes in rules, regulations, and policies may result in different conclusions than those expressed in this report.

The scope of the investigation and report was mutually devised by RES and Geocel Holdings Corporation and is not intended as an audit for regulatory compliance. No activity, including sampling, investigation or evaluation of any material or substance, may be assumed to be included in this investigation unless such activity is expressly considered in the scope of work and this report. Maps and drawings in this report are included only to aid the reader and should not be considered surveys or engineering studies.

RES's observations, findings, and opinions are based on our professional judgment concerning the significance of the data gathered during the course of this assessment. Specifically, RES does not and cannot represent that the site contains no hazardous or toxic material or other latent condition beyond that observed by RES during the assessment. The findings of the investigation are probabilities based on RES's professional judgment of site conditions as discernible from the limited, and often indirect, information provided by others and obtained or observed by RES using the methods specified. RES does not warrant the accuracy or completeness of information and independent opinions, conclusions, and recommendations provided or developed by others, and assumes no responsibility for documenting conditions detectable with methods or techniques not specified in the scope of work. RES's opinion regarding site conditions is not a warranty that all areas within the site and beneath site structures are of the same quality or condition as those observed. It should be noted that if conditions change or additional data becomes available, the opinions, findings, and conclusions presented in this report may require modification.

APPENDIX A

Figure 1 – Site Vicinity Map
Figure 2 – 2005 Aerial Photograph
Facility Evacuation Plan/Layout



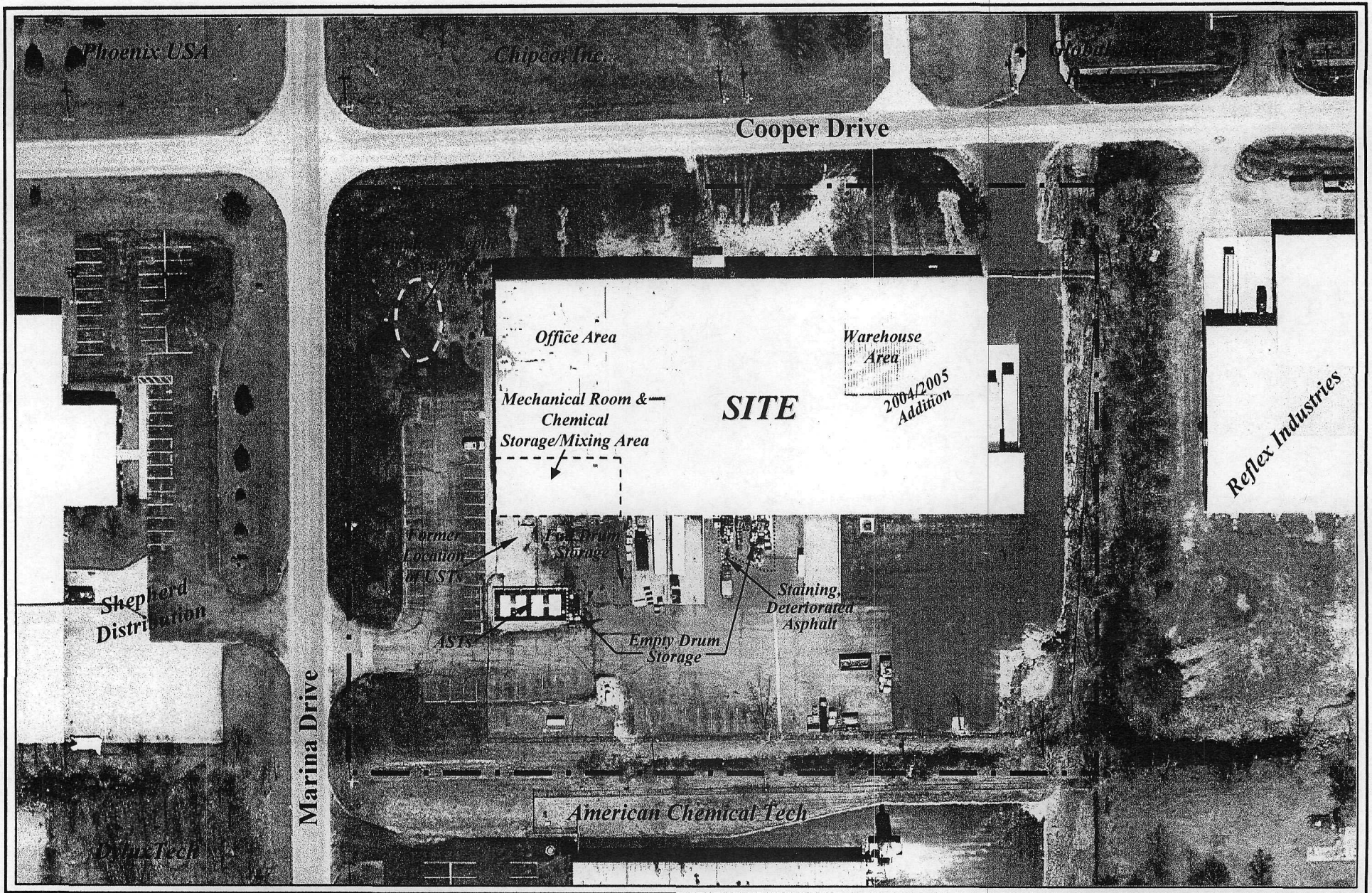
SCALE
0 1,500 3,000
1-Inch = 1,500-Feet

Prepared By:	Date Prepared:
DDJ	October 2006

USGS 7.5-Minute Topographic Map
Elkhart, Indiana, 1981

R-E-S
ROBERTS ENVIRONMENTAL SERVICES, LLC
2112 Carmen Court ▲ Goshen, Indiana 46526
Ph: (574) 537-0881 ▲ *www.robertsenvserv.com*

FIGURE 1
SITE VICINITY MAP
GEOCEL CORPORATION FACILITY
53280 MARINA DRIVE
ELKHART, INDIANA



R · E · S
ROBERTS ENVIRONMENTAL SERVICES, LLC
2112 Carmen Court • Goshen, Indiana 46526
Ph: (574) 537-0881 • Fax: (574) 537-9021
www.robertsenvserv.com

Aerial Photograph: Elkhart County GIS 2005

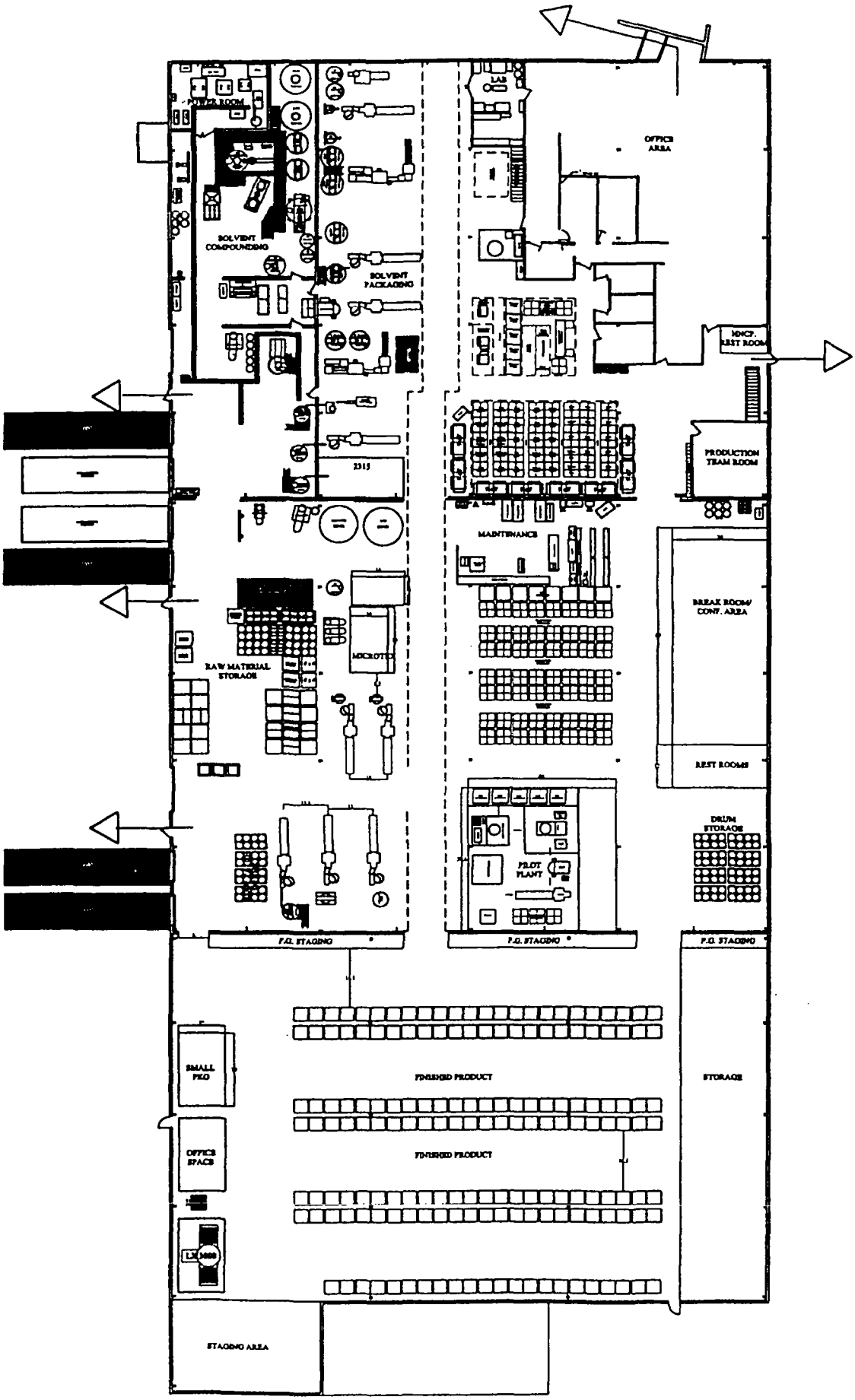
NOT TO SCALE

Approximate Property Boundary

N

FIGURE 2
2005 AERIAL PHOTOGRAPH
GEOCEL CORPORATION FACILITY
53280 MARINA DRIVE
ELKHART, INDIANA

420


OFFICE AREA
SOLVENT COMPOUNDING
SOLVENT PACKAGING
2515
MAINTENANCE
PRODUCTION TEAM ROOM
BREAK ROOM/ CONF. AREA
REST ROOMS
RAW MATERIAL STORAGE
DRUM STORAGE
PILOT PLANT
F.O. STAGING
F.O. STAGING
F.O. STAGING
SMALL PKG
FINISHED PRODUCT
FINISHED PRODUCT
STORAGE
OFFICE SPACE
STAGING AREA

North

APPENDIX B

EDR Report
(State & Federal Database Search)

EDR FieldCheck® Report

EDR® Environmental
Data Resources Inc

GeoCel Holdings Corp.
53280 Marina Drive
Elkhart, IN 46514

Inquiry Number: 1774911.1s

October 13, 2006

The Standard in Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06461

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

FORM-NULL-MEN

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TABLE OF CONTENTS

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

Important information about The EDR FieldCheck® System

The FieldCheck® system enables EDR's customers to make certain online modifications to the maps and text contained in EDR Radius Map Reports, such as relocating/deleting plotted sites or plotting/deleting orphan sites that would otherwise appear with an EDR Radius Map Report, and/or adding sites that would otherwise not appear with an EDR Radius Map Report. Such modifications may be based on site visits, independent data verification and/or other actions taken or decisions made by EDR's customer. As a result, the maps and text contained in this Report may have been so modified. EDR has not taken any action to verify any such modifications, and this report and the findings set forth herein must be read in light of this fact. ROBERTS ENV. SERVICES, LLC. should be contacted for information concerning all such modifications.

EXECUTIVE SUMMARY

At the request of ROBERTS ENV. SERVICES, LLC., a search of the environmental records covering the area detailed herein was conducted by Environmental Data Resources, Inc. (EDR). This report was derived from the results of such search, which, as conducted by EDR, met the government records search requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-05. Search distances were per ASTM standard or custom distances requested by the user.

NOTE: ALL MAPS AND TEXT INCLUDED HEREIN MAY HAVE BEEN MODIFIED BY ROBERTS ENV. SERVICES, LLC. BASED ON SITE VISITS, INDEPENDENT DATA VERIFICATION AND/OR OTHER ACTIONS TAKEN OR DECISIONS MADE BY ROBERTS ENV. SERVICES, LLC.. EDR HAS NOT TAKEN ANY ACTION TO VERIFY ANY OF SUCH MODIFICATIONS, AND THIS REPORT AND THE FINDINGS SET FORTH HEREIN MUST BE READ IN LIGHT OF THIS FACT. ROBERTS ENV. SERVICES, LLC. SHOULD BE CONTACTED FOR INFORMATION CONCERNING ALL SUCH MODIFICATIONS.

TARGET PROPERTY INFORMATION

ADDRESS

53280 MARINA DRIVE
ELKHART, IN 46514

COORDINATES

Latitude (North):	41.720200 - 41° 43' 12.7"
Longitude (West):	85.916700 - 85° 55' 0.1"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	590111.4
UTM Y (Meters):	4619065.0
Elevation:	770 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map:	41085-F8 ELKHART, IN
Most Recent Revision:	1994

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following government records. For more information on this property see page 6 of the attached report:

Site	Database(s)	EPA ID
GEOCEL CORP 53280 MARINA DR ELKHART, IN 46514	FINDS RCRA-LQG TRIS IN MANIFEST	46514GCLCR53

DATABASES WITH NO MAPPED SITES

No sites were found in an online review and analysis by ROBERTS ENV. SERVICES, LLC. of EDR's search of available ("reasonably ascertainable") government records either on the target property or within the ASTM E 1527-05 search radius around the target property for the following databases:

FEDERAL RECORDS

NPL..... National Priority List

EXECUTIVE SUMMARY

Proposed NPL	Proposed National Priority List Sites
Delisted NPL	National Priority List Deletions
NPL RECOVERY	Federal Superfund Liens
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CERC-NFRAP	CERCLIS No Further Remedial Action Planned
CORRACTS	Corrective Action Report
RCRA-TSDF	Resource Conservation and Recovery Act Information
ERNS	Emergency Response Notification System
HMIRS	Hazardous Materials Information Reporting System
US ENG CONTROLS	Engineering Controls Sites List
US INST CONTROL	Sites with Institutional Controls
DOD	Department of Defense Sites
FUDS	Formerly Used Defense Sites
US BROWNFIELDS	A Listing of Brownfields Sites
CONSENT	Superfund (CERCLA) Consent Decrees
ROD	Records Of Decision
UMTRA	Uranium Mill Tailings Sites
ODI	Open Dump Inventory
TSCA	Toxic Substances Control Act
FTTS	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
SSTS	Section 7 Tracking Systems
ICIS	Integrated Compliance Information System
PADS	PCB Activity Database System
MLTS	Material Licensing Tracking System
MINES	Mines Master Index File
RAATS	RCRA Administrative Action Tracking System

STATE AND LOCAL RECORDS

SHWS	List of Hazardous Waste Response Sites Scored Using the Indiana Scoring Model
SWF/LF	Permitted Solid Waste Facilities
LUST	Lust Leaking Underground Storage Tank List
UST	Indiana Registered Underground Storage Tanks
BULK	Registered Bulk Fertilizer and Pesticide Storage Facilities
IN Spills	Spills Incidents
AUL	Sites with Restrictions
VCP	Voluntary Remediation Program Site List
DRYCLEANERS	Drycleaner Facility Listing
BROWNFIELDS	Brownfields Site List
AIRS	Permitted Sources & Emissions Listing
TIER 2	Tier 2 Facility Listing

TRIBAL RECORDS

INDIAN RESERV	Indian Reservations
INDIAN LUST	Leaking Underground Storage Tanks on Indian Land
INDIAN UST	Underground Storage Tanks on Indian Land

EDR PROPRIETARY RECORDS

Manufactured Gas Plants	EDR Proprietary Manufactured Gas Plants

EXECUTIVE SUMMARY

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property.
Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in ***bold italics*** are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

FEDERAL RECORDS

RCRAInfo: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System(RCRIS). The database includes selective information on sites which generate, transport, store , treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month Large quantity generators generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator offsite to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

An online review and analysis by ROBERTS ENV. SERVICES, LLC. of the RCRA-SQG list, as provided by EDR, and dated 06/13/2006 has revealed that there are 4 RCRA-SQG sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CHIPCO INC	***53224 MARINA DR***	***0 - 1/8 N***	***2***	***11***
R E JACKSON CO INC	***53217 MARINA DR***	***0 - 1/8 NW***	***5***	***17***
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
VAHALA FOAM INC	***53293 MARINA DR***	***0 - 1/8 W***	***3***	***13***
KEYLINE SALES INC	***53364 MARINA DR***	***0 - 1/8 S***	***4***	***15***

STATE AND LOCAL RECORDS

MANIFEST:

An online review and analysis by ROBERTS ENV. SERVICES, LLC. of the IN MANIFEST list, as provided by EDR, and dated 12/31/2004 has revealed that there are 4 IN MANIFEST sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CHIPCO INC	***53224 MARINA DR***	***0 - 1/8 N***	***2***	***11***
R E JACKSON CO INC	***53217 MARINA DR***	***0 - 1/8 NW***	***5***	***17***
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
VAHALA FOAM INC	***53293 MARINA DR***	***0 - 1/8 W***	***3***	***13***

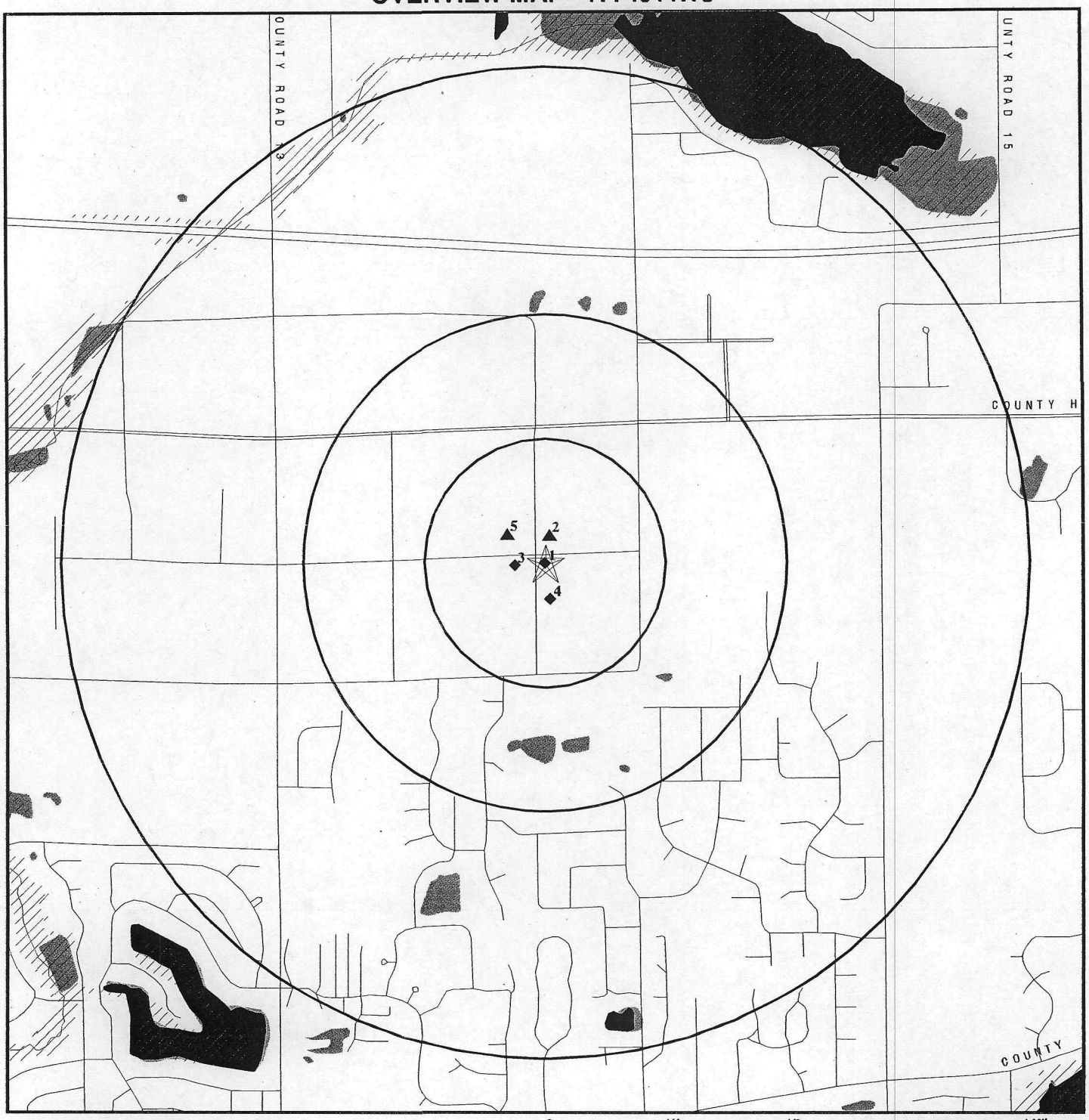
EXECUTIVE SUMMARY

Lower Elevation	Address	Dist / Dir	Map ID	Page
KEYLINE SALES INC	*53364 MARINA DR*	*0 - 1/8 S*	*4*	*15*

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:
There were no unmapped sites in this report.

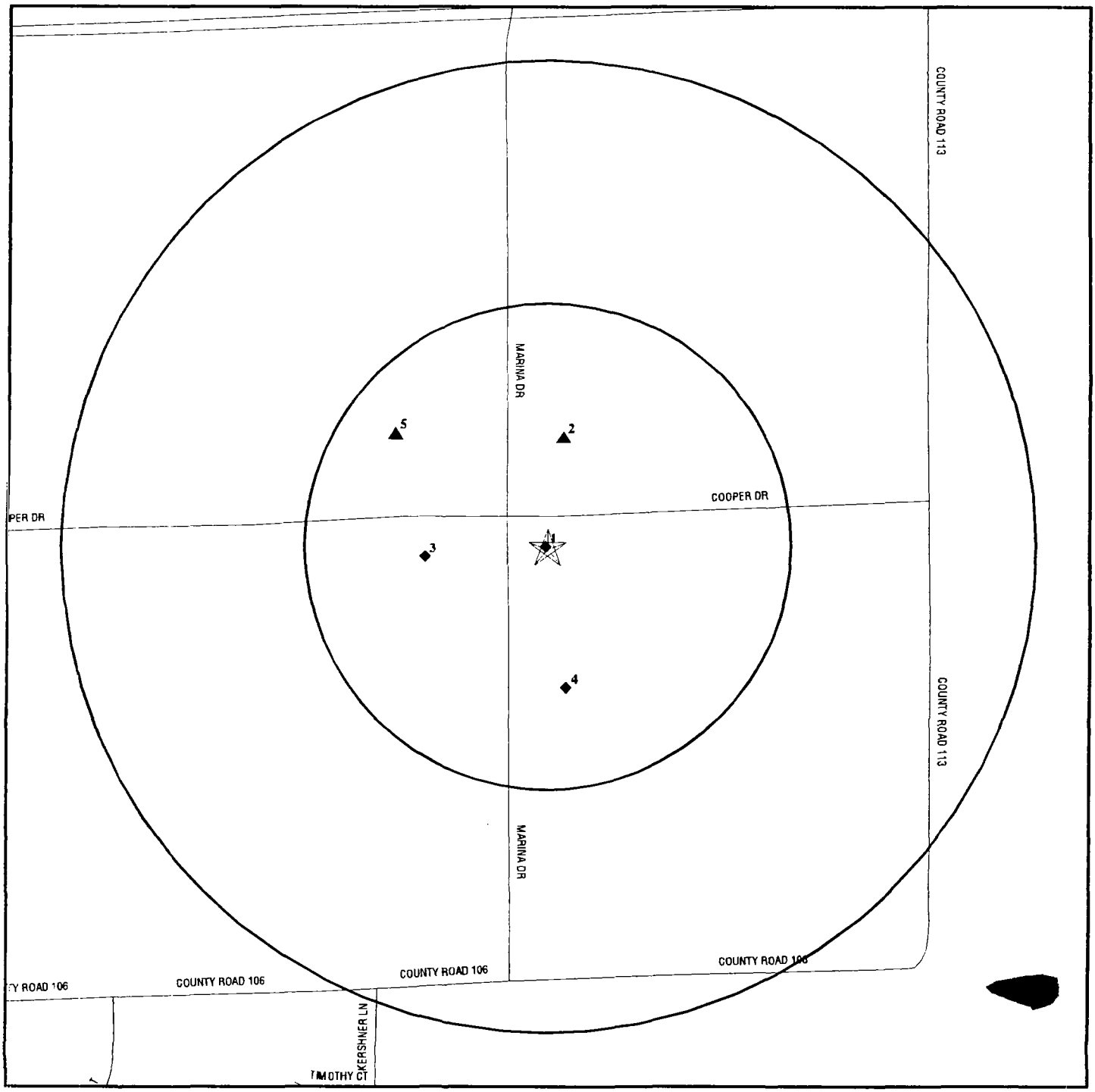
OVERVIEW MAP - 1774911.1s



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- Manufactured Gas Plants
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory

SITE NAME: GeoCel Holdings Corp.	CLIENT: Roberts Env. Services, LLC.
ADDRESS: 53280 Marina Drive Elkhart IN 46514	CONTACT: Dave Jeffers
LAT/LONG: 41.7202 / 85.9167	INQUIRY #: 1774911.1s DATE: October 13, 2006 1:50 pm

DETAIL MAP - 1774911.1s



- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- Manufactured Gas Plants
- Sensitive Receptors
- National Priority List Sites
- Landfill Sites
- Dept. Defense Sites
- Indian Reservations BIA
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- National Wetland Inventory

SITE NAME: GeoCel Holdings Corp.	CLIENT: Roberts Env. Services, LLC.
ADDRESS: 53280 Marina Drive	CONTACT: Dave Jeffers
Elkhart IN 46514	INQUIRY #: 1774911.1s
LAT/LONG: 41.7202 / 85.9167	DATE: October 13, 2006 1:50 pm

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
FEDERAL RECORDS								
NPL		1.000	0	0	0	0	NR	0
Proposed NPL		1.000	0	0	0	0	NR	0
Delisted NPL		1.000	0	0	0	0	NR	0
NPL RECOVERY		TP	NR	NR	NR	NR	NR	0
CERCLIS		0.500	0	0	0	NR	NR	0
CERC-NFRAP		0.500	0	0	0	NR	NR	0
CORRACTS		1.000	0	0	0	0	NR	0
RCRA TSD		0.500	0	0	0	NR	NR	0
RCRA Lg. Quan. Gen.	X	0.250	0	0	NR	NR	NR	0
RCRA Sm. Quan. Gen.		0.250	4	0	NR	NR	NR	4
ERNS		TP	NR	NR	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
US ENG CONTROLS		0.500	0	0	0	NR	NR	0
US INST CONTROL		0.500	0	0	0	NR	NR	0
DOD		1.000	0	0	0	0	NR	0
FUDS		1.000	0	0	0	0	NR	0
US BROWNFIELDS		0.500	0	0	0	NR	NR	0
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	0	0	0	0	NR	0
UMTRA		0.500	0	0	0	NR	NR	0
ODI		0.500	0	0	0	NR	NR	0
TRIS	X	TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
SSTS		TP	NR	NR	NR	NR	NR	0
ICIS		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
MINES		0.250	0	0	NR	NR	NR	0
FINDS	X	TP	NR	NR	NR	NR	NR	0
RAATS		TP	NR	NR	NR	NR	NR	0
STATE AND LOCAL RECORDS								
State Haz. Waste		1.000	0	0	0	0	NR	0
State Landfill		0.500	0	0	0	NR	NR	0
LUST		0.500	0	0	0	NR	NR	0
UST		0.250	0	0	NR	NR	NR	0
BULK		0.250	0	0	NR	NR	NR	0
MANIFEST	X	0.250	4	0	NR	NR	NR	4
IN Spills		TP	NR	NR	NR	NR	NR	0
AUL		0.500	0	0	0	NR	NR	0
VCP		0.500	0	0	0	NR	NR	0
DRYCLEANERS		0.250	0	0	NR	NR	NR	0
BROWNFIELDS		0.500	0	0	0	NR	NR	0
AIRS		TP	NR	NR	NR	NR	NR	0
TIER 2		TP	NR	NR	NR	NR	NR	0
TRIBAL RECORDS								
INDIAN RESERV		1.000	0	0	0	0	NR	0

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
INDIAN LUST		0.500	0	0	0	NR	NR	0
INDIAN UST		0.250	0	0	NR	NR	NR	0
EDR PROPRIETARY RECORDS								
Manufactured Gas Plants		1.000	0	0	0	0	NR	0

NOTES:

TP = Target Property

NR = Not Requested at this Search Distance

Sites may be listed in more than one database

1 **GEOCEL CORP** **FINDS** **1000892732**
Target **53280 MARINA DR** **RCRA-LQG** **46514GCLCR53**
Property **ELKHART, IN 46514** **TRIS**
IN MANIFEST

Actual:
769 ft.

FINDS:
Other Pertinent Environmental Activity Identified at Site

IN-FRS (Indiana - Facility Registry System). The Indiana Department of Environmental Management (I-DEM) has implemented the Indiana-Facility Registry System (I-FRS). The I-FRS provides the interface and processes to link facility data monitored by multiple State and EPA program systems. In addition, I-FRS enables IDEM to reconcile environmental data and exchange it with EPA FRS using the electronic data exchange over the Network Node

The NEI (National Emissions Inventory) database contains information on stationary and mobile sources that emit criteria air pollutants and their precursors, as well as hazardous air pollutants (HAPs).

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

TRIS (Toxics Release Inventory System) contains information from facilities on the amounts of over 300 listed toxic chemicals that these facilities release directly to air, water, land, or that are transported off-site.

RCRAInfo:
Owner: GEOCEL LIMITED INC
(574) 264-0645
EPA ID: IND069763639
Contact: Not reported
Classification: Large Quantity Generator
TSDF Activities: Not reported

BIENNIAL REPORTS:
Last Biennial Reporting Year: 2003

Waste	Quantity (Lbs)
D001	45766.50

Violation Status: Violations exist

Regulation Violated: 262.34/265.16
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 06/23/2005
Actual Date Achieved Compliance: 08/19/2005

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 06/23/2005
Penalty Type: Not reported

Regulation Violated: IC 13-30-2-1(4)

GEOCEL CORP (Continued) **1000892732**

Area of Violation: INSRS
Date Violation Determined: 06/23/2005
Actual Date Achieved Compliance: 08/19/2005

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 06/23/2005
Penalty Type: Not reported

Regulation Violated: 262.11
Area of Violation: GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined: 02/13/1998
Actual Date Achieved Compliance: 05/12/1998

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 03/27/1998
Penalty Type: Not reported

Regulation Violated: 265.32
Area of Violation: TSD-PREPAREDNESS/PREVENTION REQUIREMENTS
Date Violation Determined: 02/13/1998
Actual Date Achieved Compliance: 05/12/1998

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 03/27/1998
Penalty Type: Not reported

There are 4 violation record(s) reported at this site:

Evaluation	Area of Violation	Date of Compliance
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	20050819
	INSRS	20050819
Compliance Schedule Evaluation	GENERATOR-GENERAL REQUIREMENTS	19980512
	TSD-PREPAREDNESS/PREVENTION REQUIREMENTS	19980512
Compliance Evaluation Inspection	GENERATOR-GENERAL REQUIREMENTS	19980512
	TSD-PREPAREDNESS/PREVENTION REQUIREMENTS	19980512

IN MANIFEST:
EPA ID: IND069763639
Flag: HANDLER
Facility Addess 2: Not reported

MANIFEST HANDLER :
EPA ID #: IND069763639
Generator Type: LQG
Generator Status: Active
Transporter Type: Not reported
Transporter Status: Non Active
TSD Type: Interim or Enforcement TSD
TSD Status: Non Active
Handler Mailing Address: PO BOX 398
Handler Mailing City: ELKHART
Handler Mailing State: IN
Handler Mailing Zip: 46515
Contact Last Name: PETERSON
Contact First Name: KERMAN
Contact Telephone: 574-264-0645
Contact Type: B

MANIFEST REC:
Report Year: Not reported

GEOCEL CORP (Continued) **1000892732**

EPA ID: Not reported
Page Number: Not reported
Sub Page: Not reported
Generator EPA ID: Not reported
Waste Description: Not reported
Quantity of Waste: Not reported
Unit of Measure: Not reported

MANIFEST SHIPPER:
EPA ID: IND069763639
Waste Description Shipped: WASTE FLAMMABLE LIQUID (END OF RUN BATCH MATERIAL)
Shipped File Page Number: 1
Number Of TSD Facilities: 1
Waste Codes on Page Number: 1
Waste Code: D001
Tons Of Waste Shipped Year: 3
TSD Facility EPA ID: IND000646943
Facility Address 2: Not reported

EPA ID: IND069763639
Waste Description Shipped: WASTE FLAMMABLE SOLIDS (END OF RUN BATCH MATERIAL)
Shipped File Page Number: 2
Number Of TSD Facilities: 1
Waste Codes on Page Number: 1
Waste Code: D001
Tons Of Waste Shipped Year: 0
TSD Facility EPA ID: IND000646943
Facility Address 2: Not reported

EPA ID: IND069763639
Waste Description Shipped: WASTE PETROLEUM DISTILLATES (CLEANING SOLVENT)
Shipped File Page Number: 3
Number Of TSD Facilities: 1
Waste Codes on Page Number: 1
Waste Code: D001
Tons Of Waste Shipped Year: 0
TSD Facility EPA ID: IND000646943
Facility Address 2: Not reported

EPA ID: IND069763639
Waste Description Shipped: WASTE CORROSIVE LIQUID (MISCELLANEOUS WASTE MATERIAL)
Shipped File Page Number: 4
Number Of TSD Facilities: 1
Waste Codes on Page Number: 1
Waste Code: D006
Tons Of Waste Shipped Year: 1
TSD Facility EPA ID: ILD980613913
Facility Address 2: Not reported

EPA ID: IND069763639
Waste Description Shipped: WASTE CORROSIVE LIQUID (MISCELLANEOUS WASTE MATERIAL)
Shipped File Page Number: 4
Number Of TSD Facilities: 1
Waste Codes on Page Number: 2
Waste Code: D008
Tons Of Waste Shipped Year: 1
TSD Facility EPA ID: ILD980613913

GEOCEL CORP (Continued) **1000892732**

Facility Address 2: Not reported
IN MANIFEST SHIPPER: Has 19 more record(s) for this section. Please contact your EDR Account Executive for more information

MANIFEST TRA :
Report Year: 2004
Generator EPA ID: IND069763639
Page Number of Report: 1
Transporter's EPA ID: IND984872846
Num Of Tranporters Used: 1

Report Year: 2004
Generator EPA ID: IND069763639
Page Number of Report: 3
Transporter's EPA ID: IND984872846
Num Of Tranporters Used: 1

Report Year: 2004
Generator EPA ID: IND069763639
Page Number of Report: 4
Transporter's EPA ID: TXR000050930
Num Of Tranporters Used: 1

Report Year: 2004
Generator EPA ID: IND069763639
Page Number of Report: 2
Transporter's EPA ID: IND000646943
Num Of Tranporters Used: 2

Report Year: 2004
Generator EPA ID: IND069763639
Page Number of Report: 2
Transporter's EPA ID: IND984872846
Num Of Tranporters Used: 1
IN MANIFEST TRA: Has 13 more record(s) for this section. Please contact your EDR Account Executive for more information

EPA ID: IND069763639
Flag: SHIP
Facility Addess 2: Not reported

MANIFEST HANDLER :
EPA ID #: IND069763639
Generator Type: LQG
Generator Status: Active
Transporter Type: Not reported
Transporter Status: Non Active
TSD Type: Interim or Enforcement TSD
TSD Status: Non Active
Handler Mailing Address: PO BOX 398
Handler Mailing City: ELKHART
Handler Mailing State: IN
Handler Mailing Zip: 46515
Contact Last Name: PETERSON
Contact First Name: KERMAN
Contact Telephone: 574-264-0645

GEOCEL CORP (Continued) **1000892732**

Contact Type: B

MANIFEST REC:
Report Year: Not reported
EPA ID: Not reported
Page Number: Not reported
Sub Page: Not reported
Generator EPA ID: Not reported
Waste Description: Not reported
Quantity of Waste: Not reported
Unit of Measure: Not reported

MANIFEST SHIPPER:
EPA ID: IND069763639
Waste Description Shipped: WASTE FLAMMABLE LIQUID (END OF RUN BATCH MATERIAL)
Shipped File Page Number: 1
Number Of TSD Facilities: 1
Waste Codes on Page Number: 1
Waste Code: D001
Tons Of Waste Shipped Year: 3
TSD Facility EPA ID: IND000646943
Facility Address 2: Not reported

EPA ID: IND069763639
Waste Description Shipped: WASTE FLAMMABLE SOLIDS (END OF RUN BATCH MATERIAL)
Shipped File Page Number: 2
Number Of TSD Facilities: 1
Waste Codes on Page Number: 1
Waste Code: D001
Tons Of Waste Shipped Year: 0
TSD Facility EPA ID: IND000646943
Facility Address 2: Not reported

EPA ID: IND069763639
Waste Description Shipped: WASTE PETROLEUM DISTILLATES (CLEANING SOLVENT)
Shipped File Page Number: 3
Number Of TSD Facilities: 1
Waste Codes on Page Number: 1
Waste Code: D001
Tons Of Waste Shipped Year: 0
TSD Facility EPA ID: IND000646943
Facility Address 2: Not reported

EPA ID: IND069763639
Waste Description Shipped: WASTE CORROSIVE LIQUID (MISCELLANEOUS WASTE MATERIAL)
Shipped File Page Number: 4
Number Of TSD Facilities: 1
Waste Codes on Page Number: 1
Waste Code: D006
Tons Of Waste Shipped Year: 1
TSD Facility EPA ID: ILD980613913
Facility Address 2: Not reported

EPA ID: IND069763639
Waste Description Shipped: WASTE CORROSIVE LIQUID (MISCELLANEOUS WASTE MATERIAL)
Shipped File Page Number: 4

GEOCEL CORP (Continued) **1000892732**

Number Of TSD Facilities: 1
Waste Codes on Page Number: 2
Waste Code: D008
Tons Of Waste Shipped Year: 1
TSD Facility EPA ID: ILD980613913
Facility Address 2: Not reported
IN MANIFEST SHIPPER: Has 19 more record(s) for this section. Please contact your EDR Account Executive for more information

MANIFEST TRA :
Report Year: 2004
Generator EPA ID: IND069763639
Page Number of Report: 1
Transporter's EPA ID: IND984872846
Num Of Tranporters Used: 1

Report Year: 2004
Generator EPA ID: IND069763639
Page Number of Report: 3
Transporter's EPA ID: IND984872846
Num Of Tranporters Used: 1

Report Year: 2004
Generator EPA ID: IND069763639
Page Number of Report: 4
Transporter's EPA ID: TXR000050930
Num Of Tranporters Used: 1

Report Year: 2004
Generator EPA ID: IND069763639
Page Number of Report: 2
Transporter's EPA ID: IND000646943
Num Of Tranporters Used: 2

Report Year: 2004
Generator EPA ID: IND069763639
Page Number of Report: 2
Transporter's EPA ID: IND984872846
Num Of Tranporters Used: 1
IN MANIFEST TRA: Has 13 more record(s) for this section. Please contact your EDR Account Executive for more information

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2 **CHIPCO INC** **RCRA-SQG** **1004698810**
North **53224 MARINA DR** **FINDS** **IN0000238832**
< 1/8 **ELKHART, IN 46514** **IN MANIFEST**
301 ft.

Relative:
Equal

Actual:
770 ft.

CHIPCO INC (Continued) **1004698810**

RCRAInfo:
Owner: CHIPO INC
(219) 264-1818
EPA ID: IN0000238832
Contact: BECKY LOTH
(219) 264-1818
Classification: Conditionally Exempt Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site

IN-FRS (Indiana - Facility Registry System). The Indiana Department of Environmental Management (I-DEM) has implemented the Indiana-Facility Registry System (I-FRS). The I-FRS provides the interface and processes to link facility data monitored by multiple State and EPA program systems. In addition, I-FRS enables IDEM to reconcile environmental data and exchange it with EPA FRS using the electronic data exchange over the Network Node

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

TRIS (Toxics Release Inventory System) contains information from facilities on the amounts of over 300 listed toxic chemicals that these facilities release directly to air, water, land, or that are transported off-site.

IN MANIFEST:
EPA ID: IN0000238832
Flag: HANDLER
Facility Addess 2: Not reported

MANIFEST HANDLER :
EPA ID #: IN0000238832
Generator Type: CEG
Generator Status: Active
Transporter Type: Not reported
Transporter Status: Non Active
TSD Type: Interim or Enforcement TSD
TSD Status: Non Active
Handler Mailing Address: 53224 MARINA DR
Handler Mailing City: ELKHART
Handler Mailing State: IN
Handler Mailing Zip: 46514-8325
Contact Last Name: LOTH
Contact First Name: BECKY
Contact Telephone: 574-264-1818

CHIPCO INC (Continued) **1004698810**

Contact Type: B

MANIFEST REC:
Report Year: Not reported
EPA ID: Not reported
Page Number: Not reported
Sub Page: Not reported
Generator EPA ID: Not reported
Waste Description: Not reported
Quantity of Waste: Not reported
Unit of Measure: Not reported

MANIFEST SHIPPER:
EPA ID: Not reported
Waste Description Shipped: Not reported
Shipped File Page Number: Not reported
Number Of TSD Facilities: Not reported
Waste Codes on Page Number: Not reported
Waste Code: Not reported
Tons Of Waste Shipped Year: Not reported
TSD Facility EPA ID: Not reported
Facility Address 2: Not reported

MANIFEST TRA :
Report Year: Not reported
Generator EPA ID: Not reported
Page Number of Report: Not reported
Transporter's EPA ID: Not reported
Num Of Tranporters Used: Not reported

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3 **VAHALA FOAM INC** **RCRA-SQG** **1004699896**
West **53293 MARINA DR** **FINDS** **INR000004135**
< 1/8 **ELKHART, IN 46515** **IN MANIFEST**
332 ft.

Relative:
Lower

Actual:
769 ft.

RCRAInfo:
Owner: DANIEL P VAHALA
(219) 875-3157
EPA ID: INR000004135
Contact: DANIEL VAHALA
(219) 264-9942

Classification: Conditionally Exempt Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site

AFS (Aerometric Information Retrieval System (AIRS) Facility Subsystem) replaces the former Compliance Data System (CDS), the National Emission Data System (NEDS), and the Storage and Retrieval of Aerometric Data (SAROAD). AIRS is the national repository for information concerning airborne pollution in the United States. AFS is used to track emissions and compliance data from industrial

VAHALA FOAM INC (Continued) **1004699896**

plants. AFS data are utilized by states to prepare State Implementation Plans to comply with regulatory programs and by EPA as an input for the estimation of total national emissions. AFS is undergoing a major redesign to support facility operating permits required under Title V of the Clean Air Act.

IN-FRS (Indiana - Facility Registry System). The Indiana Department of Environmental Management (I-DEM) has implemented the Indiana-Facility Registry System (I-FRS). The I-FRS provides the interface and processes to link facility data monitored by multiple State and EPA program systems. In addition, I-FRS enables IDEM to reconcile environmental data and exchange it with EPA FRS using the electronic data exchange over the Network Node

The NEI (National Emissions Inventory) database contains information on stationary and mobile sources that emit criteria air pollutants and their precursors, as well as hazardous air pollutants (HAPs).

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

TRIS (Toxics Release Inventory System) contains information from facilities on the amounts of over 300 listed toxic chemicals that these facilities release directly to air, water, land, or that are transported off-site.

IN MANIFEST:

EPA ID:	INR000004135
Flag:	HANDLER
Facility Addess 2:	Not reported

MANIFEST HANDLER :

EPA ID #:	INR000004135
Generator Type:	CEG
Generator Status:	Active
Transporter Type:	Not reported
Transporter Status:	Non Active
TSD Type:	Interim or Enforcement TSD
TSD Status:	Non Active
Handler Mailing Address:	PO BOX 2602
Handler Mailing City:	ELKHART
Handler Mailing State:	IN
Handler Mailing Zip:	46515
Contact Last Name:	VAHALA
Contact First Name:	DANIEL
Contact Telephone:	574-264-9942
Contact Type:	B

MANIFEST REC:

Report Year:	Not reported

VAHALA FOAM INC (Continued) **1004699896**

EPA ID: Not reported
Page Number: Not reported
Sub Page: Not reported
Generator EPA ID: Not reported
Waste Description: Not reported
Quantity of Waste: Not reported
Unit of Measure: Not reported

MANIFEST SHIPPER:
EPA ID: Not reported
Waste Description Shipped: Not reported
Shipped File Page Number: Not reported
Number Of TSD Facilities: Not reported
Waste Codes on Page Number: Not reported
Waste Code: Not reported
Tons Of Waste Shipped Year: Not reported
TSD Facility EPA ID: Not reported
Facility Address 2: Not reported

MANIFEST TRA :
Report Year: Not reported
Generator EPA ID: Not reported
Page Number of Report: Not reported
Transporter's EPA ID: Not reported
Num Of Tranporters Used: Not reported

4
South
< 1/8
388 ft.

KEYLINE SALES INC
53364 MARINA DR
ELKHART, IN 46515

RCRA-SQG **1000109029**
FINDS **IND074301268**
IN MANIFEST

Relative:
Lower

Actual:
769 ft.

RCRAInfo:
Owner: LOWENHAR JUDD
(312) 555-1212
EPA ID: IND074301268
Contact: JUDD LOWENHAR
(219) 262-4571
Classification: Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site

IN-FRS (Indiana - Facility Registry System). The Indiana Department of Environmental Management (I-DEM) has implemented the Indiana-Facility Registry System (I-FRS). The I-FRS provides the interface and processes to link facility data monitored by multiple State and EPA program systems. In addition, I-FRS enables IDEM to reconcile environmental data and exchange it with EPA FRS using the electronic data exchange over the Network Node

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or

KEYLINE SALES INC (Continued) **1000109029**

dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

IN MANIFEST:

EPA ID:	IND074301268
Flag:	HANDLER
Facility Addess 2:	Not reported

MANIFEST HANDLER :

EPA ID #:	IND074301268
Generator Type:	0
Generator Status:	Non Active
Transporter Type:	Not reported
Transporter Status:	Non Active
TSD Type:	Interim or Enforcement TSD
TSD Status:	Non Active
Handler Mailing Address:	53364 MARINA DR
Handler Mailing City:	ELKHART
Handler Mailing State:	IN
Handler Mailing Zip:	46514
Contact Last Name:	Not reported
Contact First Name:	Not reported
Contact Telephone:	Not reported
Contact Type:	Not reported

MANIFEST REC:

Report Year:	Not reported
EPA ID:	Not reported
Page Number:	Not reported
Sub Page:	Not reported
Generator EPA ID:	Not reported
Waste Description:	Not reported
Quantity of Waste:	Not reported
Unit of Measure:	Not reported

MANIFEST SHIPPER:

EPA ID:	Not reported
Waste Description Shipped:	Not reported
Shipped File Page Number:	Not reported
Number Of TSD Facilities:	Not reported
Waste Codes on Page Number:	Not reported
Waste Code:	Not reported
Tons Of Waste Shipped Year:	Not reported
TSD Facility EPA ID:	Not reported
Facility Address 2:	Not reported

MANIFEST TRA :

Report Year:	Not reported
Generator EPA ID:	Not reported
Page Number of Report:	Not reported
Transporter's EPA ID:	Not reported
Num Of Tranporters Used:	Not reported

5
NW
< 1/8
516 ft.

R E JACKSON CO INC
53217 MARINA DR
ELKHART, IN 46514

RCRA-SQG
FINDS
IN MANIFEST

1000265319
IND065854887

Relative:
Equal

Actual:
770 ft.

RCRAInfo:
Owner: NAME NOT REPORTED
(312) 555-1212
EPA ID: IND065854887
Contact: Not reported
Classification: Conditionally Exempt Small Quantity Generator
TSDF Activities: Not reported

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site

IN-FRS (Indiana - Facility Registry System). The Indiana Department of Environmental Management (I-DEM) has implemented the Indiana-Facility Registry System (I-FRS). The I-FRS provides the interface and processes to link facility data monitored by multiple State and EPA program systems. In addition, I-FRS enables IDEM to reconcile environmental data and exchange it with EPA FRS using the electronic data exchange over the Network Node

RCRAInfo is a national information system that supports the Resource Conservation and Recovery Act (RCRA) program through the tracking of events and activities related to facilities that generate, transport, and treat, store, or dispose of hazardous waste. RCRAInfo allows RCRA program staff to track the notification, permit, compliance, and corrective action activities required under RCRA.

IN MANIFEST:
EPA ID: IND065854887
Flag: HANDLER
Facility Addess 2: Not reported

MANIFEST HANDLER :
EPA ID #: IND065854887
Generator Type: CEG
Generator Status: Active
Transporter Type: Not reported
Transporter Status: Non Active
TSD Type: Interim or Enforcement TSD
TSD Status: Non Active
Handler Mailing Address: 53217 MARINA DR
Handler Mailing City: ELKHART
Handler Mailing State: IN
Handler Mailing Zip: 46514
Contact Last Name: CRAIG
Contact First Name: GORDON
Contact Telephone: 574-264-7557
Contact Type: B

R E JACKSON CO INC (Continued) **1000265319**

MANIFEST REC:

Report Year:	Not reported
EPA ID:	Not reported
Page Number:	Not reported
Sub Page:	Not reported
Generator EPA ID:	Not reported
Waste Description:	Not reported
Quantity of Waste:	Not reported
Unit of Measure:	Not reported

MANIFEST SHIPPER:

EPA ID:	Not reported
Waste Description Shipped:	Not reported
Shipped File Page Number:	Not reported
Number Of TSD Facilities:	Not reported
Waste Codes on Page Number:	Not reported
Waste Code:	Not reported
Tons Of Waste Shipped Year:	Not reported
TSD Facility EPA ID:	Not reported
Facility Address 2:	Not reported

MANIFEST TRA :

Report Year:	Not reported
Generator EPA ID:	Not reported
Page Number of Report:	Not reported
Transporter's EPA ID:	Not reported
Num Of Tranporters Used:	Not reported

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
		NO SITES FOUND			

EPA Waste Codes Addendum

Code	Description
D001	IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

To maintain currency of the following federal and state databases, EDR contacts the appropriate governmental agency on a monthly or quarterly basis, as required.

Number of Days to Update: Provides confirmation that EDR is reporting records that have been updated within 90 days from the date the government agency made the information available to the public.

FEDERAL RECORDS

NPL: National Priority List

National Priorities List (Superfund). The NPL is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund Program. NPL sites may encompass relatively large areas. As such, EDR provides polygon coverage for over 1,000 NPL site boundaries produced by EPA's Environmental Photographic Interpretation Center (EPIC) and regional EPA offices.

Date of Government Version: 07/05/2006
Date Data Arrived at EDR: 08/02/2006
Date Made Active in Reports: 09/12/2006
Number of Days to Update: 41

Source: EPA
Telephone: N/A
Last EDR Contact: 08/02/2006
Next Scheduled EDR Contact: 10/30/2006
Data Release Frequency: Quarterly

NPL Site Boundaries

Sources:

EPA's Environmental Photographic Interpretation Center (EPIC)
Telephone: 202-564-7333

EPA Region 1
Telephone 617-918-1143

EPA Region 6
Telephone: 214-655-6659

EPA Region 3
Telephone 215-814-5418

EPA Region 7
Telephone: 913-551-7247

EPA Region 4
Telephone 404-562-8033

EPA Region 8
Telephone: 303-312-6774

EPA Region 5
Telephone 312-886-6686

EPA Region 9
Telephone: 415-947-4246

EPA Region 10
Telephone 206-553-8665

Proposed NPL: Proposed National Priority List Sites

Date of Government Version: 07/05/2006
Date Data Arrived at EDR: 08/02/2006
Date Made Active in Reports: 09/12/2006
Number of Days to Update: 41

Source: EPA
Telephone: N/A
Last EDR Contact: 08/02/2006
Next Scheduled EDR Contact: 10/30/2006
Data Release Frequency: Quarterly

DELISTED NPL: National Priority List Deletions

The National Oil and Hazardous Substances Pollution Contingency Plan (NCP) establishes the criteria that the EPA uses to delete sites from the NPL. In accordance with 40 CFR 300.425.(e), sites may be deleted from the NPL where no further response is appropriate.

Date of Government Version: 07/05/2006
Date Data Arrived at EDR: 08/02/2006
Date Made Active in Reports: 09/12/2006
Number of Days to Update: 41

Source: EPA
Telephone: N/A
Last EDR Contact: 08/02/2006
Next Scheduled EDR Contact: 10/30/2006
Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

NPL RECOVERY: Federal Superfund Liens

Federal Superfund Liens. Under the authority granted the USEPA by CERCLA of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner received notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/1991
Date Data Arrived at EDR: 02/02/1994
Date Made Active in Reports: 03/30/1994
Number of Days to Update: 56

Source: EPA
Telephone: 202-564-4267
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: No Update Planned

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System

CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 06/19/2006
Date Data Arrived at EDR: 06/22/2006
Date Made Active in Reports: 08/23/2006
Number of Days to Update: 62

Source: EPA
Telephone: 703-603-8960
Last EDR Contact: 09/21/2006
Next Scheduled EDR Contact: 12/18/2006
Data Release Frequency: Quarterly

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

Date of Government Version: 07/17/2006
Date Data Arrived at EDR: 08/02/2006
Date Made Active in Reports: 09/12/2006
Number of Days to Update: 41

Source: EPA
Telephone: 703-603-8960
Last EDR Contact: 09/18/2006
Next Scheduled EDR Contact: 12/18/2006
Data Release Frequency: Quarterly

CORRACTS: Corrective Action Report

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 03/15/2006
Date Data Arrived at EDR: 03/17/2006
Date Made Active in Reports: 04/13/2006
Number of Days to Update: 27

Source: EPA
Telephone: 800-424-9346
Last EDR Contact: 09/05/2006
Next Scheduled EDR Contact: 12/04/2006
Data Release Frequency: Quarterly

RCRA: Resource Conservation and Recovery Act Information

RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS). The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month. Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 06/13/2006
Date Data Arrived at EDR: 06/28/2006
Date Made Active in Reports: 08/23/2006
Number of Days to Update: 56

Source: EPA
Telephone: 800-424-9346
Last EDR Contact: 09/28/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Quarterly

ERNS: Emergency Response Notification System

Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 01/12/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 40

Source: National Response Center, United States Coast Guard
Telephone: 202-260-2342
Last EDR Contact: 07/25/2006
Next Scheduled EDR Contact: 10/23/2006
Data Release Frequency: Annually

HMIRS: Hazardous Materials Information Reporting System

Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 07/03/2006
Date Data Arrived at EDR: 07/19/2006
Date Made Active in Reports: 08/23/2006
Number of Days to Update: 35

Source: U.S. Department of Transportation
Telephone: 202-366-4555
Last EDR Contact: 07/19/2006
Next Scheduled EDR Contact: 10/16/2006
Data Release Frequency: Annually

US ENG CONTROLS: Engineering Controls Sites List

A listing of sites with engineering controls in place. Engineering controls include various forms of caps, building foundations, liners, and treatment methods to create pathway elimination for regulated substances to enter environmental media or effect human health.

Date of Government Version: 03/21/2006
Date Data Arrived at EDR: 03/27/2006
Date Made Active in Reports: 05/22/2006
Number of Days to Update: 56

Source: Environmental Protection Agency
Telephone: 703-603-8905
Last EDR Contact: 09/07/2006
Next Scheduled EDR Contact: 10/02/2006
Data Release Frequency: Varies

US INST CONTROL: Sites with Institutional Controls

A listing of sites with institutional controls in place. Institutional controls include administrative measures, such as groundwater use restrictions, construction restrictions, property use restrictions, and post remediation care requirements intended to prevent exposure to contaminants remaining on site. Deed restrictions are generally required as part of the institutional controls.

Date of Government Version: 03/21/2006
Date Data Arrived at EDR: 03/27/2006
Date Made Active in Reports: 05/22/2006
Number of Days to Update: 56

Source: Environmental Protection Agency
Telephone: 703-603-8905
Last EDR Contact: 09/07/2006
Next Scheduled EDR Contact: 10/02/2006
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

DOD: Department of Defense Sites

This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 12/31/2004
Date Data Arrived at EDR: 02/08/2005
Date Made Active in Reports: 08/04/2005
Number of Days to Update: 177

Source: USGS
Telephone: 703-692-8801
Last EDR Contact: 08/11/2006
Next Scheduled EDR Contact: 11/06/2006
Data Release Frequency: Semi-Annually

FUDS: Formerly Used Defense Sites

The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 12/05/2005
Date Data Arrived at EDR: 01/19/2006
Date Made Active in Reports: 02/21/2006
Number of Days to Update: 33

Source: U.S. Army Corps of Engineers
Telephone: 202-528-4285
Last EDR Contact: 09/18/2006
Next Scheduled EDR Contact: 01/01/2007
Data Release Frequency: Varies

US BROWNFIELDS: A Listing of Brownfields Sites

Included in the listing are brownfields properties addresses by Cooperative Agreement Recipients and brownfields properties addressed by Targeted Brownfields Assessments. Targeted Brownfields Assessments-EPA's Targeted Brownfields Assessments (TBA) program is designed to help states, tribes, and municipalities–especially those without EPA Brownfields Assessment Demonstration Pilots–minimize the uncertainties of contamination often associated with brownfields. Under the TBA program, EPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. Targeted Brownfields Assessments supplement and work with other efforts under EPA's Brownfields Initiative to promote cleanup and redevelopment of brownfields. Cooperative Agreement Recipients-States, political subdivisions, territories, and Indian tribes become Brownfields Cleanup Revolving Loan Fund (BCRLF) cooperative agreement recipients when they enter into BCRLF cooperative agreements with the U.S. EPA. EPA selects BCRLF cooperative agreement recipients based on a proposal and application process. BCRLF cooperative agreement recipients must use EPA funds provided through BCRLF cooperative agreement for specified brownfields-related cleanup activities.

Date of Government Version: 07/10/2006
Date Data Arrived at EDR: 07/13/2006
Date Made Active in Reports: 09/06/2006
Number of Days to Update: 55

Source: Environmental Protection Agency
Telephone: 202-566-2777
Last EDR Contact: 09/11/2006
Next Scheduled EDR Contact: 12/11/2006
Data Release Frequency: Semi-Annually

CONSENT: Superfund (CERCLA) Consent Decrees

Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: 12/14/2004
Date Data Arrived at EDR: 02/15/2005
Date Made Active in Reports: 04/25/2005
Number of Days to Update: 69

Source: Department of Justice, Consent Decree Library
Telephone: Varies
Last EDR Contact: 09/18/2006
Next Scheduled EDR Contact: 10/23/2006
Data Release Frequency: Varies

ROD: Records Of Decision

Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 07/10/2006
Date Data Arrived at EDR: 07/21/2006
Date Made Active in Reports: 09/06/2006
Number of Days to Update: 47

Source: EPA
Telephone: 703-416-0223
Last EDR Contact: 10/02/2006
Next Scheduled EDR Contact: 01/01/2007
Data Release Frequency: Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

UMTRA: Uranium Mill Tailings Sites

Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized.

Date of Government Version: 11/04/2005
Date Data Arrived at EDR: 11/28/2005
Date Made Active in Reports: 01/30/2006
Number of Days to Update: 63

Source: Department of Energy
Telephone: 505-845-0011
Last EDR Contact: 09/05/2006
Next Scheduled EDR Contact: 12/18/2006
Data Release Frequency: Varies

ODI: Open Dump Inventory

An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria.

Date of Government Version: 06/30/1985
Date Data Arrived at EDR: 08/09/2004
Date Made Active in Reports: 09/17/2004
Number of Days to Update: 39

Source: Environmental Protection Agency
Telephone: 800-424-9346
Last EDR Contact: 06/09/2004
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

PRP: Potentially Responsible Parties

A listing of verified Potentially Responsible Parties

Date of Government Version: 07/20/2006
Date Data Arrived at EDR: 07/21/2006
Date Made Active in Reports: 08/22/2006
Number of Days to Update: 32

Source: EPA
Telephone: 202-564-6064
Last EDR Contact: 10/02/2006
Next Scheduled EDR Contact: 01/01/2007
Data Release Frequency: Quarterly

TRIS: Toxic Chemical Release Inventory System

Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/2004
Date Data Arrived at EDR: 06/22/2006
Date Made Active in Reports: 08/23/2006
Number of Days to Update: 62

Source: EPA
Telephone: 202-566-0250
Last EDR Contact: 09/22/2006
Next Scheduled EDR Contact: 12/18/2006
Data Release Frequency: Annually

TSCA: Toxic Substances Control Act

Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/2002
Date Data Arrived at EDR: 04/14/2006
Date Made Active in Reports: 05/30/2006
Number of Days to Update: 46

Source: EPA
Telephone: 202-260-5521
Last EDR Contact: 07/17/2006
Next Scheduled EDR Contact: 10/16/2006
Data Release Frequency: Every 4 Years

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 07/14/2006
Date Data Arrived at EDR: 07/18/2006
Date Made Active in Reports: 09/06/2006
Number of Days to Update: 50

Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-566-1667
Last EDR Contact: 09/18/2006
Next Scheduled EDR Contact: 12/18/2006
Data Release Frequency: Quarterly

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

Date of Government Version: 07/14/2006
Date Data Arrived at EDR: 07/18/2006
Date Made Active in Reports: 09/06/2006
Number of Days to Update: 50

Source: EPA
Telephone: 202-566-1667
Last EDR Contact: 09/18/2006
Next Scheduled EDR Contact: 12/18/2006
Data Release Frequency: Quarterly

SSTS: Section 7 Tracking Systems

Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/2004
Date Data Arrived at EDR: 05/11/2006
Date Made Active in Reports: 05/22/2006
Number of Days to Update: 11

Source: EPA
Telephone: 202-564-4203
Last EDR Contact: 07/17/2006
Next Scheduled EDR Contact: 10/16/2006
Data Release Frequency: Annually

ICIS: Integrated Compliance Information System

The Integrated Compliance Information System (ICIS) supports the information needs of the national enforcement and compliance program as well as the unique needs of the National Pollutant Discharge Elimination System (NPDES) program.

Date of Government Version: 02/13/2006
Date Data Arrived at EDR: 04/21/2006
Date Made Active in Reports: 05/11/2006
Number of Days to Update: 20

Source: Environmental Protection Agency
Telephone: 202-564-5088
Last EDR Contact: 07/17/2006
Next Scheduled EDR Contact: 10/16/2006
Data Release Frequency: Quarterly

PADS: PCB Activity Database System

PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 07/07/2006
Date Data Arrived at EDR: 08/09/2006
Date Made Active in Reports: 09/06/2006
Number of Days to Update: 28

Source: EPA
Telephone: 202-566-0500
Last EDR Contact: 08/09/2006
Next Scheduled EDR Contact: 11/06/2006
Data Release Frequency: Annually

MLTS: Material Licensing Tracking System

MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 07/10/2006
Date Data Arrived at EDR: 07/20/2006
Date Made Active in Reports: 09/06/2006
Number of Days to Update: 48

Source: Nuclear Regulatory Commission
Telephone: 301-415-7169
Last EDR Contact: 10/02/2006
Next Scheduled EDR Contact: 01/01/2007
Data Release Frequency: Quarterly

MINES: Mines Master Index File

Contains all mine identification numbers issued for mines active or opened since 1971. The data also includes violation information.

Date of Government Version: 05/16/2006
Date Data Arrived at EDR: 06/28/2006
Date Made Active in Reports: 08/23/2006
Number of Days to Update: 56

Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-5959
Last EDR Contact: 09/27/2006
Next Scheduled EDR Contact: 12/25/2006
Data Release Frequency: Semi-Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

FINDS: Facility Index System/Facility Registry System

Facility Index System. FINDS contains both facility information and 'pointers' to other sources that contain more detail. EDR includes the following FINDS databases in this report: PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), C-DOCKET (Criminal Docket System used to track criminal enforcement actions for all environmental statutes), FFIS (Federal Facilities Information System), STATE (State Environmental Laws and Statutes), and PADS (PCB Activity Data System).

Date of Government Version: 07/21/2006
Date Data Arrived at EDR: 07/25/2006
Date Made Active in Reports: 09/06/2006
Number of Days to Update: 43

Source: EPA
Telephone: N/A
Last EDR Contact: 10/02/2006
Next Scheduled EDR Contact: 01/01/2007
Data Release Frequency: Quarterly

RAATS: RCRA Administrative Action Tracking System

RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/1995
Date Data Arrived at EDR: 07/03/1995
Date Made Active in Reports: 08/07/1995
Number of Days to Update: 35

Source: EPA
Telephone: 202-564-4104
Last EDR Contact: 09/05/2006
Next Scheduled EDR Contact: 12/04/2006
Data Release Frequency: No Update Planned

BRS: Biennial Reporting System

The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/2003
Date Data Arrived at EDR: 06/17/2005
Date Made Active in Reports: 08/04/2005
Number of Days to Update: 48

Source: EPA/NTIS
Telephone: 800-424-9346
Last EDR Contact: 10/06/2006
Next Scheduled EDR Contact: 12/11/2006
Data Release Frequency: Biennially

STATE AND LOCAL RECORDS

SHWS: List of Hazardous Waste Response Sites Scored Using the Indiana Scoring Model

State Hazardous Waste Sites. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. Available information varies by state.

Date of Government Version: 04/21/2006
Date Data Arrived at EDR: 05/16/2006
Date Made Active in Reports: 06/12/2006
Number of Days to Update: 27

Source: Department of Environmental Management
Telephone: 317-308-3052
Last EDR Contact: 09/28/2006
Next Scheduled EDR Contact: 12/25/2006
Data Release Frequency: Annually

SWF/LF: Permitted Solid Waste Facilities

Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 02/24/2006
Date Data Arrived at EDR: 04/28/2006
Date Made Active in Reports: 05/26/2006
Number of Days to Update: 28

Source: Department of Environmental Management
Telephone: 317-232-0066
Last EDR Contact: 10/12/2006
Next Scheduled EDR Contact: 01/08/2007
Data Release Frequency: Semi-Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

LUST: Lust Leaking Underground Storage Tank List

Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 06/14/2006
Date Data Arrived at EDR: 06/28/2006
Date Made Active in Reports: 07/28/2006
Number of Days to Update: 30

Source: Department of Environmental Management
Telephone: 317-308-3008
Last EDR Contact: 09/28/2006
Next Scheduled EDR Contact: 12/25/2006
Data Release Frequency: Annually

UST: Indiana Registered Underground Storage Tanks

Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 06/14/2006
Date Data Arrived at EDR: 06/28/2006
Date Made Active in Reports: 08/04/2006
Number of Days to Update: 37

Source: Department of Environmental Management
Telephone: 317-308-3008
Last EDR Contact: 09/27/2006
Next Scheduled EDR Contact: 12/25/2006
Data Release Frequency: Quarterly

BULK: Registered Bulk Fertilizer and Pesticide Storage Facilities

A listing of registered dry or liquid bulk fertilizer and pesticide storage facilities.

Date of Government Version: 06/12/2006
Date Data Arrived at EDR: 06/13/2006
Date Made Active in Reports: 07/28/2006
Number of Days to Update: 45

Source: Office of Indiana State Chemist
Telephone: 765-494-0579
Last EDR Contact: 09/11/2006
Next Scheduled EDR Contact: 12/11/2006
Data Release Frequency: Varies

MANIFEST: Manifest Data

Date of Government Version: 12/31/2004
Date Data Arrived at EDR: 03/16/2006
Date Made Active in Reports: 05/02/2006
Number of Days to Update: 47

Source: Department of Environmental Management
Telephone: 317-233-4624
Last EDR Contact: 07/31/2006
Next Scheduled EDR Contact: 10/30/2006
Data Release Frequency: Annually

SPILLS: Spills Incidents

Date of Government Version: 03/01/2006
Date Data Arrived at EDR: 03/29/2006
Date Made Active in Reports: 05/02/2006
Number of Days to Update: 34

Source: Department of Environmental Management
Telephone: 317-308-3038
Last EDR Contact: 10/05/2006
Next Scheduled EDR Contact: 12/25/2006
Data Release Frequency: Semi-Annually

AUL: Sites with Restrictions

Activity and use limitations include both engineering controls and institutional controls. A listing of Comfort/Site Status Letter sites that have been issued with controls.

Date of Government Version: 06/29/2006
Date Data Arrived at EDR: 06/29/2006
Date Made Active in Reports: 07/28/2006
Number of Days to Update: 29

Source: Department of Environmental Management
Telephone: 317-232-8603
Last EDR Contact: 09/25/2006
Next Scheduled EDR Contact: 12/25/2006
Data Release Frequency: Varies

VCP: Voluntary Remediation Program Site List

A current list of Voluntary Remediation Program sites that are no longer confidential.

Date of Government Version: 05/01/2006
Date Data Arrived at EDR: 05/11/2006
Date Made Active in Reports: 05/26/2006
Number of Days to Update: 15

Source: Department of Environmental Management
Telephone: 317-234-0966
Last EDR Contact: 08/11/2006
Next Scheduled EDR Contact: 11/06/2006
Data Release Frequency: Semi-Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

DRYCLEANERS: Drycleaner Facility Listing
A list of drycleaners involved in the Indiana 5-Star Environmental Recognition Program. It is a voluntary program that ranks participating drycleaners on a scale of one to five stars. The program recognizes those drycleaners willing to do more for the environment and worker safety than the rules require. These drycleaners are going above and beyond the rules to protect the environment, their employees and their neighbors and customers.

Date of Government Version: 10/17/2005
Date Data Arrived at EDR: 01/09/2006
Date Made Active in Reports: 01/30/2006
Number of Days to Update: 21

Source: Department of Environmental Management
Telephone: 800-988-7901
Last EDR Contact: 07/14/2006
Next Scheduled EDR Contact: 10/09/2006
Data Release Frequency: Varies

BROWNFIELDS: Brownfields Site List
A brownfield site is an industrial or commercial property that is abandoned, inactive, or underutilized, on which expansion or redeveloopment is complicated due to the actual or perceived environmental contamination.

Date of Government Version: 06/27/2006
Date Data Arrived at EDR: 06/27/2006
Date Made Active in Reports: 07/28/2006
Number of Days to Update: 31

Source: Department of Environmental Management
Telephone: 317-233-2570
Last EDR Contact: 09/25/2006
Next Scheduled EDR Contact: 12/25/2006
Data Release Frequency: Semi-Annually

AIRS: Permitted Sources & Emissions Listing
Current permitted sources and emissions inventory information.

Date of Government Version: 05/12/2006
Date Data Arrived at EDR: 05/17/2006
Date Made Active in Reports: 06/12/2006
Number of Days to Update: 26

Source: Department of Environmental Management
Telephone: 317-233-0185
Last EDR Contact: 08/30/2006
Next Scheduled EDR Contact: 10/30/2006
Data Release Frequency: Varies

TIER 2: Tier 2 Facility Listing
A listing of facilities which store or manufacture hazardous materials that submit a chemical inventory report.

Date of Government Version: 04/03/2006
Date Data Arrived at EDR: 05/04/2006
Date Made Active in Reports: 06/12/2006
Number of Days to Update: 39

Source: Department of Environmental Management
Telephone: 317-233-0066
Last EDR Contact: 09/25/2006
Next Scheduled EDR Contact: 12/25/2006
Data Release Frequency: Varies

TRIBAL RECORDS

INDIAN RESERV: Indian Reservations
This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version: 12/31/2004
Date Data Arrived at EDR: 02/08/2005
Date Made Active in Reports: 08/04/2005
Number of Days to Update: 177

Source: USGS
Telephone: 202-208-3710
Last EDR Contact: 08/11/2006
Next Scheduled EDR Contact: 11/06/2006
Data Release Frequency: Semi-Annually

INDIAN LUST R1: Leaking Underground Storage Tanks on Indian Land
A listing of leaking underground storage tank locations on Indian Land.

Date of Government Version: 06/08/2006
Date Data Arrived at EDR: 06/09/2006
Date Made Active in Reports: 06/28/2006
Number of Days to Update: 19

Source: EPA Region 1
Telephone: 617-918-1313
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Varies

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

INDIAN LUST R6: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in New Mexico and Oklahoma.

Date of Government Version: 01/04/2005
Date Data Arrived at EDR: 01/21/2005
Date Made Active in Reports: 02/28/2005
Number of Days to Update: 38

Source: EPA Region 6
Telephone: 214-665-6597
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Varies

INDIAN LUST R8: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Colorado, Montana, North Dakota, South Dakota, Utah and Wyoming.

Date of Government Version: 06/06/2006
Date Data Arrived at EDR: 06/09/2006
Date Made Active in Reports: 07/28/2006
Number of Days to Update: 49

Source: EPA Region 8
Telephone: 303-312-6271
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Quarterly

INDIAN LUST R10: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Alaska, Idaho, Oregon and Washington.

Date of Government Version: 06/08/2006
Date Data Arrived at EDR: 06/09/2006
Date Made Active in Reports: 07/28/2006
Number of Days to Update: 49

Source: EPA Region 10
Telephone: 206-553-2857
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Quarterly

INDIAN LUST R9: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Arizona, California, New Mexico and Nevada

Date of Government Version: 06/01/2006
Date Data Arrived at EDR: 06/23/2006
Date Made Active in Reports: 08/02/2006
Number of Days to Update: 40

Source: Environmental Protection Agency
Telephone: 415-972-3372
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Quarterly

INDIAN LUST R7: Leaking Underground Storage Tanks on Indian Land
LUSTs on Indian land in Iowa, Kansas, and Nebraska

Date of Government Version: 06/01/2006
Date Data Arrived at EDR: 07/10/2006
Date Made Active in Reports: 09/12/2006
Number of Days to Update: 64

Source: EPA Region 7
Telephone: 913-551-7003
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Varies

INDIAN UST R7: Underground Storage Tanks on Indian Land

Date of Government Version: 06/01/2006
Date Data Arrived at EDR: 07/10/2006
Date Made Active in Reports: 09/12/2006
Number of Days to Update: 64

Source: EPA Region 7
Telephone: 913-551-7003
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Varies

INDIAN UST R5: Underground Storage Tanks on Indian Land

Date of Government Version: 12/02/2004
Date Data Arrived at EDR: 12/29/2004
Date Made Active in Reports: 02/04/2005
Number of Days to Update: 37

Source: EPA Region 5
Telephone: 312-886-6136
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Varies

INDIAN UST R8: Underground Storage Tanks on Indian Land

Date of Government Version: 06/06/2006
Date Data Arrived at EDR: 06/09/2006
Date Made Active in Reports: 07/28/2006
Number of Days to Update: 49

Source: EPA Region 8
Telephone: 303-312-6137
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Quarterly

INDIAN UST R10: Underground Storage Tanks on Indian Land

Date of Government Version: 06/08/2006
Date Data Arrived at EDR: 06/09/2006
Date Made Active in Reports: 07/28/2006
Number of Days to Update: 49

Source: EPA Region 10
Telephone: 206-553-2857
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Quarterly

INDIAN UST R1: Underground Storage Tanks on Indian Land

A listing of underground storage tank locations on Indian Land.

Date of Government Version: 06/08/2006
Date Data Arrived at EDR: 06/09/2006
Date Made Active in Reports: 06/30/2006
Number of Days to Update: 21

Source: EPA, Region 1
Telephone: 617-918-1313
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Varies

INDIAN UST R6: Underground Storage Tanks on Indian Land

Date of Government Version: 06/30/2006
Date Data Arrived at EDR: 07/03/2006
Date Made Active in Reports: 09/06/2006
Number of Days to Update: 65

Source: EPA Region 6
Telephone: 214-665-7591
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Semi-Annually

INDIAN UST R9: Underground Storage Tanks on Indian Land

Date of Government Version: 06/01/2006
Date Data Arrived at EDR: 06/23/2006
Date Made Active in Reports: 08/02/2006
Number of Days to Update: 40

Source: EPA Region 9
Telephone: 415-972-3368
Last EDR Contact: 08/21/2006
Next Scheduled EDR Contact: 11/20/2006
Data Release Frequency: Quarterly

EDR PROPRIETARY RECORDS

Manufactured Gas Plants: EDR Proprietary Manufactured Gas Plants

The EDR Proprietary Manufactured Gas Plant Database includes records of coal gas plants (manufactured gas plants) compiled by EDR's researchers. Manufactured gas sites were used in the United States from the 1800's to 1950's to produce a gas that could be distributed and used as fuel. These plants used whale oil, rosin, coal, or a mixture of coal, oil, and water that also produced a significant amount of waste. Many of the byproducts of the gas production, such as coal tar (oily waste containing volatile and non-volatile chemicals), sludges, oils and other compounds are potentially hazardous to human health and the environment. The byproduct from this process was frequently disposed of directly at the plant site and can remain or spread slowly, serving as a continuous source of soil and groundwater contamination.

Date of Government Version: N/A
Date Data Arrived at EDR: N/A
Date Made Active in Reports: N/A
Number of Days to Update: N/A

Source: EDR, Inc.
Telephone: N/A
Last EDR Contact: N/A
Next Scheduled EDR Contact: N/A
Data Release Frequency: No Update Planned

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

OTHER DATABASE(S)

Depending on the geographic area covered by this report, the data provided in these specialty databases may or may not be complete. For example, the existence of wetlands information data in a specific report does not mean that all wetlands in the area covered by the report are included. Moreover, the absence of any reported wetlands information does not necessarily mean that wetlands do not exist in the area covered by the report.

CT MANIFEST: Hazardous Waste Manifest Data
Facility and manifest data. Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a tsd facility.

Date of Government Version: 12/31/2004
Date Data Arrived at EDR: 02/17/2006
Date Made Active in Reports: 04/07/2006
Number of Days to Update: 49

Source: Department of Environmental Protection
Telephone: 860-424-3375
Last EDR Contact: 09/11/2006
Next Scheduled EDR Contact: 12/11/2006
Data Release Frequency: Annually

NJ MANIFEST: Manifest Information
Hazardous waste manifest information.

Date of Government Version: 06/01/2006
Date Data Arrived at EDR: 07/06/2006
Date Made Active in Reports: 08/01/2006
Number of Days to Update: 26

Source: Department of Environmental Protection
Telephone: N/A
Last EDR Contact: 10/05/2006
Next Scheduled EDR Contact: 01/01/2007
Data Release Frequency: Annually

NY MANIFEST: Facility and Manifest Data
Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a TSD facility.

Date of Government Version: 05/02/2006
Date Data Arrived at EDR: 05/31/2006
Date Made Active in Reports: 06/27/2006
Number of Days to Update: 27

Source: Department of Environmental Conservation
Telephone: 518-402-8651
Last EDR Contact: 08/30/2006
Next Scheduled EDR Contact: 11/27/2006
Data Release Frequency: Annually

PA MANIFEST: Manifest Information
Hazardous waste manifest information.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 05/04/2006
Date Made Active in Reports: 06/06/2006
Number of Days to Update: 33

Source: Department of Environmental Protection
Telephone: N/A
Last EDR Contact: 09/11/2006
Next Scheduled EDR Contact: 12/11/2006
Data Release Frequency: Annually

RI MANIFEST: Manifest information
Hazardous waste manifest information

Date of Government Version: 09/30/2005
Date Data Arrived at EDR: 05/09/2006
Date Made Active in Reports: 05/24/2006
Number of Days to Update: 15

Source: Department of Environmental Management
Telephone: 401-222-2797
Last EDR Contact: 09/18/2006
Next Scheduled EDR Contact: 12/18/2006
Data Release Frequency: Annually

VT MANIFEST: Hazardous Waste Manifest Data
Hazardous waste manifest information.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 06/29/2006
Date Made Active in Reports: 07/31/2006
Number of Days to Update: 32

Source: Department of Environmental Conservation
Telephone: 802-241-3443
Last EDR Contact: 08/15/2006
Next Scheduled EDR Contact: 11/13/2006
Data Release Frequency: Annually

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

WI MANIFEST: Manifest Information
Hazardous waste manifest information.

Date of Government Version: 12/31/2005
Date Data Arrived at EDR: 03/17/2006
Date Made Active in Reports: 05/02/2006
Number of Days to Update: 46

Source: Department of Natural Resources
Telephone: N/A
Last EDR Contact: 10/09/2006
Next Scheduled EDR Contact: 01/08/2007
Data Release Frequency: Annually

Oil/Gas Pipelines: This data was obtained by EDR from the USGS in 1994. It is referred to by USGS as GeoData Digital Line Graphs from 1:100,000-Scale Maps. It was extracted from the transportation category including some oil, but primarily gas pipelines.

Electric Power Transmission Line Data
Source: PennWell Corporation
Telephone: (800) 823-6277
This map includes information copyrighted by PennWell Corporation. This information is provided on a best effort basis and PennWell Corporation does not guarantee its accuracy nor warrant its fitness for any particular purpose. Such information has been reprinted with the permission of PennWell.

Sensitive Receptors: There are individuals deemed sensitive receptors due to their fragile immune systems and special sensitivity to environmental discharges. These sensitive receptors typically include the elderly, the sick, and children. While the location of all sensitive receptors cannot be determined, EDR indicates those buildings and facilities - schools, daycares, hospitals, medical centers, and nursing homes - where individuals who are sensitive receptors are likely to be located.

AHA Hospitals:
Source: American Hospital Association, Inc.
Telephone: 312-280-5991
The database includes a listing of hospitals based on the American Hospital Association's annual survey of hospitals.

Medical Centers: Provider of Services Listing
Source: Centers for Medicare & Medicaid Services
Telephone: 410-786-3000
A listing of hospitals with Medicare provider number, produced by Centers of Medicare & Medicaid Services, a federal agency within the U.S. Department of Health and Human Services.

Nursing Homes
Source: National Institutes of Health
Telephone: 301-594-6248
Information on Medicare and Medicaid certified nursing homes in the United States.

Public Schools
Source: National Center for Education Statistics
Telephone: 202-502-7300
The National Center for Education Statistics' primary database on elementary and secondary public education in the United States. It is a comprehensive, annual, national statistical database of all public elementary and secondary schools and school districts, which contains data that are comparable across all states.

Private Schools
Source: National Center for Education Statistics
Telephone: 202-502-7300
The National Center for Education Statistics' primary database on private school locations in the United States.

Daycare Centers: child Care Listing
Source: Family & Social Services Administration
Telephone: 317-232-4740

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1999 from the Federal Emergency Management Agency (FEMA). Data depicts 100-year and 500-year flood zones as defined by FEMA.

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 2002 and 2005 from the U.S. Fish and Wildlife Service.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

STREET AND ADDRESS INFORMATION

EDR® Environmental Data Resources Inc

"Linking Technology with Tradition"®

Sanborn® Map Report

Ship To: Dave Jeffers
Roberts Env. Services,
2112 Carmen Court
Goshen, IN 46526

Order Date: 10/13/2006 **Completion Date:** 10/13/2006
Inquiry #: 1774911.2
P.O. #: NA
Site Name: GeoCel Holdings Corp.
Address: 53280 Marina Drive
City/State: Elkhart, IN 46514
Cross Streets:

Customer Project: 06-10246-10
4013401MEN 574-537-0881

This document reports that the largest and most complete collection of Sanborn fire insurance maps has been reviewed based on client supplied information, and fire insurance maps depicting the target property at the specified address were not identified.

NO COVERAGE

APPENDIX C

Elkhart County Health Department Records

ELKHART COUNTY GROUND WATER PROTECTION PROGRAM
REGISTRATION AND INSPECTION FORM

Facility Name	Geocel Corp.		Facility I.D. Number	332	Date 4-26-05
Address	53280 Marina Dr. P.O Box 348		Contact Name	Kermon Peterson	
City	Elkhart	Zip 46515	Township 02	Phone Number 264-0645	NAICS 325520

Purpose: (check all that apply)

Routine	[✓]	Registration	[ ]
Reinspection	[ ]	Spill	[ ]
Complaint	[ ]	Other	[ ]

Additional Information: (check all that apply)

Hazardous Waste Inspected: SQG [ ] LQG [✓] TSD [ ] Unknown [ ]

SARA Title III:
- Emergency Planning (EHS) [✓]
- Toxic Chemical Release Reporting [✓]
- Community Right-To-Know Requirements [✓]
- Unknown [ ]

Registration Exemption: (check all that apply)

- No on-site wastewater disposal system [✓]
- Store < 100 kg/mo. of hazardous/toxic substances [ ]
- Resale of unopened products [ ]
- Laboratory [ ]

The items marked below identify violations of the Elkhart County Ground Water Protection Ordinance 99-250. All violations should be corrected as soon as possible, but no later than the compliance time indicated under each violation. Failure to comply may result in the assessment of fines. **Prior to the indicated compliance time written requests for the extension of compliance times or appeals regarding this inspection may be directed to the Elkhart County Health Department, 4230 Elkhart Road, Goshen, IN, 46526, Phone (574) 875-3391, Fax (574) 875-3376.**

Registration

11 Registered on-site wastewater disposal systems (5.A.) **(Immediate compliance)**

System 1: Type City Flow _____
Location ✓ connected 4 yrs ago ≈ 2001
System 2: Type _____ Flow _____
Location _____
System 3: Type _____ Flow _____
Location _____
System 4: Type _____ Flow _____
Location _____
System 5: Type _____ Flow _____
Location _____

12 Registered hazardous/toxic materials storage area (5.B.) **(Immediate compliance)**

13 Notified ECHD of changes to on-site wastewater disposal system or hazardous/toxic substances storage area (RR 2.C., RR 2.D.) **(Immediate compliance)**

On-site Wastewater Disposal System

14 Furnished a wastewater characterization for each on-site wastewater disposal system (6.) **(30 days to comply)**

Inspections

15 Upon notice of a violation, correct the violation as requested (12.B.) **(Immediate compliance)**

16 Provided requested information to determine compliance with ordinance (13.C.) **(Immediate compliance)**

Indoor Storage of Hazardous/Toxic Substances

17 Toxic/hazardous substances located in a manner to prevent a spill onto the ground (RR 4.B.) **(7 days to comply)**

18 Toxic/hazardous substances located in a manner to prevent a spill into a drain that is connected to an on-site wastewater disposal system (RR 4.B.) **(7 days to comply)**

Outside Storage of Hazardous/Toxic Substances

19 Storage on an impervious underlying base (RR 4.A.) **(7 days to comply)**

20 Storage in a containment system with adequate capacity (RR 4.A.) **(14 days to comply)**

21 Proper maintenance of containment system to protect integrity and capacity (RR 4.A.) **(14 days to comply)**

22 Proper removal or disposal of spilled material and accumulated precipitation (RR 4.A.) **(7 days to comply)**

23 Storage in product-tight containers (RR 4.C.) **(7 days to comply)**

24 Controlled drainage of precipitation in the containment system (RR 4.D.) **(7 days to comply)**

25 Storage in secondary containment (RR 4.A.) **(14 days to comply)**

Temporary Storage Areas

26 Storage on an impervious underlying base (RR 4.H.) **(7 days to comply)**

27 Storage does not exceed two (2) business days (RR 4.H.) **(2 days to comply)**

28 Spill response plan (RR 4.H.) **(7 days to comply)**

Spills

29 Spill of a toxic or hazardous substance (4.) **(Immediate compliance)**

30 Discharge of process wastewater into or above an aquifer (4.) **(Immediate compliance)**

31 Reportable spill due to quantity requirements (10.A. and 10.C.) **(Immediate compliance)**

32 Reportable spill damaging waters of the state (10.A. and 10.C.) **(Immediate compliance)**

33 Reportable spill due to no spill response (10.A.) **(Immediate compliance)**

34 Undertake spill response activities (10.C.)**(7 days to comply)**

#25 - Corrected upon inspection - Tramel

Follow-up Action: Reinspection on or about ____/____/____

Routine (Priority Category) (1) 2 3 0

Received by: Mark Tramel

Inspected by: Connie Burgan

*Compliance with the Elkhart County Ground Water Protection Ordinance does not exempt this facility from any other federal, state or local laws, codes or regulations.

10/03 White – ECHD 1 Yellow – Facility Pink – ECHD 2

060

5-2

ELKHART COUNTY GROUND WATER PROTECTION PROGRAM
REGISTRATION AND INSPECTION FORM

Facility Name Geocel Corp	Facility I.D. Number 332	Date 4-26-05
Address 53280 Marina Dr. P.O. Box 398	Contact Name Kerman Peterson	

City Elkhart	Zip 46515	Township 02	Phone Number 264-0645	NAICS 325520

Purpose: (check all that apply)

- Routine [✓]
- Reinspection [ ]
- Complaint [ ]
- Registration [ ]
- Spill [ ]
- Other [ ]

Additional Information: (check all that apply)

Hazardous Waste Inspected: SQG [ ] LQG [✓] TSD [ ] Unknown [ ]

SARA Title III:
- Emergency Planning (EHS) [✓]
- Toxic Chemical Release Reporting [✓]
- Community Right-To-Know Requirements [✓]
- Unknown [ ]

Registration Exemption: (check all that apply)

- No on-site wastewater disposal system [✓]
- Store < 100 kg/mo. of hazardous/toxic substances [ ]
- Resale of unopened products [ ]
- Laboratory [ ]

The items marked below identify violations of the Elkhart County Ground Water Protection Ordinance 99-250. All violations should be corrected as soon as possible, but no later than the compliance time indicated under each violation. Failure to comply may result in the assessment of fines. **Prior to the indicated compliance time written requests for the extension of compliance times or appeals regarding this inspection may be directed to the Elkhart County Health Department, 4230 Elkhart Road, Goshen, IN, 46526, Phone (574) 875-3391, Fax (574) 875-3376.**

Registration

11 Registered on-site wastewater disposal systems (5.A.) **(Immediate compliance)**

System 1: Type City Flow ____
Location connected 4 yrs ago ≈ 2001
System 2: Type ____ Flow ____
Location ____
System 3: Type ____ Flow ____
Location ____
System 4: Type ____ Flow ____
Location ____
System 5: Type ____ Flow ____
Location ____

12 Registered hazardous/toxic materials storage area (5.B.) **(Immediate compliance)**

13 Notified ECHD of changes to on-site wastewater disposal system or hazardous/toxic substances storage area (RR 2.C., RR 2.D.) **(Immediate compliance)**

On-site Wastewater Disposal System

14 Furnished a wastewater characterization for each on-site wastewater disposal system (6.) **(30 days to comply)**

Inspections

15 Upon notice of a violation, correct the violation as requested (12.B.) **(Immediate compliance)**

16 Provided requested information to determine compliance with ordinance (13.C.) **(Immediate compliance)**

Indoor Storage of Hazardous/Toxic Substances

17 Toxic/hazardous substances located in a manner to prevent a spill onto the ground (RR 4.B.) **(7 days to comply)**

18 Toxic/hazardous substances located in a manner to prevent a spill into a drain that is connected to an on-site wastewater disposal system (RR 4.B.) **(7 days to comply)**

Outside Storage of Hazardous/Toxic Substances

19 Storage on an impervious underlying base (RR 4.A.) **(7 days to comply)**

20 Storage in a containment system with adequate capacity (RR 4.A.) **(14 days to comply)**

21 Proper maintenance of containment system to protect integrity and capacity (RR 4.A.) **(14 days to comply)**

22 Proper removal or disposal of spilled material and accumulated precipitation (RR 4.A.) **(7 days to comply)**

23 Storage in product-tight containers (RR 4.C.) **(7 days to comply)**

24 Controlled drainage of precipitation in the containment system (RR 4.D.) **(7 days to comply)**

(25) Storage in secondary containment (RR 4.A.) **(14 days to comply)**

Temporary Storage Areas

26 Storage on an impervious underlying base (RR 4.H.) **(7 days to comply)**

27 Storage does not exceed two (2) business days (RR 4.H.) **(2 days to comply)**

28 Spill response plan (RR 4.H.) **(7 days to comply)**

Spills

29 Spill of a toxic or hazardous substance (4.) **(Immediate compliance)**

30 Discharge of process wastewater into or above an aquifer (4.) **(Immediate compliance)**

31 Reportable spill due to quantity requirements (10.A. and 10.C.) **(Immediate compliance)**

32 Reportable spill damaging waters of the state (10.A. and 10.C.) **(Immediate compliance)**

33 Reportable spill due to no spill response (10.A.) **(Immediate compliance)**

34 Undertake spill response activities (10.C.) **(7 days to comply)**

#25 - Corrected upon inspection - Thanks!

Follow-up Action: Reinspection on or about ___/___/___

Routine (Priority Category) (1) 2 3 0

Received by: Kerman Peterson

Inspected by: Carrie Brunson

*Compliance with the Elkhart County Ground Water Protection Ordinance does not exempt this facility from any other federal, state or local laws, codes or regulations.

10/03 White – ECHD 1 Yellow – Facility Pink – ECHD 2

070

ELKHART COUNTY GROUND WATER PROTECTION PROGRAM
TOXIC OR HAZARDOUS SUBSTANCE STORAGE AREAS
REGISTRATION INFORMATION

5-2-05

FACILITY NAME Geocel FACILITY ID NUMBER 332

Hazardous Substance	Type of Container D	B	C	A	T	U	O	Maximum Amount Stored In Any Month			Storage Location Inside	Outside	Date Added	Deleted
Perchloroethylene				2				10,000	(gals)	lbs		✓	4/04	
SC-100 (xylene)				2				8,000	(gals)	lbs		✓	↓	
Wastewater				1				4,000	(gals)	lbs	✓		↓	
mineral spirits	3							165	(gals)	lbs	✓		↓	
santicizer	4							220	(gals)	lbs	✓		↓	
propylene glycol	2							110	(gals)	lbs	✓		↓	
ethylene glycol	2							110	(gals)	lbs	✓		↓	
hazardous waste	5							275	(gals)	lbs	✓		↓	
nonhazardous waste	4							220	(gals)	lbs	✓		↓	
used oil	2							110	(gals)	lbs	✓		↓	
unknown	1							55	(gals)	lbs		✓	↓	
PM acetate	2							110	(gals)	lbs	✓		↓	
Ammonium hydroxide	2							110	(gals)	lbs	✓		↓	
									gals	lbs				
									gals	lbs				
									gals	lbs				
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									gals	lbs				
									gals	lbs				

Container type D – drum, B – bucket, C – can, A – above ground storage tank, T – tote, U – underground storage tank, O – other

1/00 White – ECHD Yellow - Facility

3-1-00

ELKHART COUNTY GROUND WATER PROTECTION PROGRAM
REGISTRATION AND INSPECTION FORM

Facility Name Geocel Corp		Facility I.D. Number 332	Date 2/10/00
Address 53280 Marina Dr		Contact Name Bill Grashorn	
City Elkhart	Zip 46514	Township 02	Phone Number 264-0645	NAICS 325520

Purpose: (check all that apply)

Routine	☒	Registration	☐
Reinspection	☐	Spill	☐
Complaint	☐	Other	☐

Additional Information: (check all that apply)

Hazardous Waste Inspected: SQG ☐ LQG ☒ TSD ☐ Unknown ☐

SARA Title III:	Emergency Planning (EHS)	☐
	Toxic Chemical Release Reporting	☒
	Community Right-To-Know Requirements	☒
	Unknown	☐

Registration Exemption: (check all that apply)

No on-site wastewater disposal system	☐	Resale of unopened products	☐
Store < 100 kg/mo. of hazardous/toxic substances	☐	Laboratory	☐

The items marked below identify violations of the Elkhart County Ground Water Protection Ordinance 99-250. All violations should be corrected as soon as possible, but no later than the compliance time indicated under each violation. Failure to comply may result in the assessment of fines. **Prior to the indicated compliance time written requests for the extension of compliance times or appeals regarding this inspection may be directed to the Elkhart County Health Department, 4230 Elkhart Road, Goshen, IN, 46526, (219) 875-3391.**

Registration

11 Registered on-site wastewater disposal systems (5.A.) **(Immediate compliance)**

System 1: Type Septic Flow _____
Location 50' west, 70' South of NE corner of Bldg.

System 2: Type _____ Flow _____
Location _____

System 3: Type _____ Flow _____
Location _____

System 4: Type _____ Flow _____
Location _____

System 5: Type _____ Flow _____
Location _____

System 6: Type _____ Flow _____
Location _____

12 Registered hazardous/toxic materials storage area (5.B.) **(Immediate compliance)**

13 Notified ECHD of changes to on-site wastewater disposal system or hazardous/toxic substances storage area (RR 2.C., RR 2.D.) **(Immediate compliance)**

On-site Wastewater Disposal System

14 Furnished a wastewater characterization for each on-site wastewater disposal system (6.) **(30 days to comply)**

Inspections

15 Upon notice of a violation, correct the violation as requested (12.B.) **(Immediate compliance)**

16 Provided requested information to determine compliance with ordinance (13.C.) **(Immediate compliance)**

Indoor Storage of Hazardous/Toxic Substances

17 Toxic/hazardous substances located in a manner to prevent a spill onto the ground (RR 4.B.) **(7 days to comply)**

18 Toxic/hazardous substances located in a manner to prevent a spill into a drain that is connected to an on-site wastewater disposal system (RR 4.B.) **(7 days to comply)**

Outside Storage of Hazardous/Toxic Substances

19 Storage on an impervious underlying base (RR 4.A.) **(7 days to comply)**

20 Storage in a containment system with adequate capacity (RR 4.A.) **(14 days to comply)**

21 Proper maintenance of containment system to protect integrity and capacity (RR 4.A.) **(14 days to comply)**

22 Proper removal or disposal of spilled material and accumulated precipitation (RR 4.A.) **(7 days to comply)**

23 Storage in product-tight containers (RR 4.C.) **(7 days to comply)**

24 Controlled drainage of precipitation in the containment system (RR 4.D.) **(7 days to comply)**

25 Storage in secondary containment (RR 4.A.) **(14 days to comply)**

Temporary Storage Areas

26 Storage on an impervious underlying base (RR 4.H.) **(7 days to comply)**

27 Storage does not exceed two (2) business days (RR 4.H.) **(2 days to comply)**

28 Spill response plan (RR 4.H.) **(7 days to comply)**

Spills

29 Spill of a toxic or hazardous substance (4.) **(Immediate compliance)**

30 Discharge of process wastewater into or above an aquifer (4.) **(Immediate compliance)**

31 Reportable spill due to quantity requirements (10.A. and 10.C.) **(Immediate compliance)**

32 Reportable spill damaging waters of the state (10.A. and 10.C.) **(Immediate compliance)**

33 Reportable spill due to no spill response (10.A.) **(Immediate compliance)**

34 Undertake spill response activities (10.C.)**(7 days to comply)**

Follow-up Action: Reinspection on or about ___/___/___

Routine (Priority Category) (1) 2 3 0

Received by: Bill Grashorn

Inspected by: Christie J Stubbs

*Compliance with the Elkhart County Ground Water Protection Ordinance does not exempt this facility from any other federal, state or local laws, codes or regulations.

1/00 White – ECHD 1 Yellow – Facility Pink – ECHD 2

DA

072

3-1-00

ELKHARTY COUNTY GROUND WATER PROTECTION PROGRAM
TOXIC OR HAZARDOUS SUBSTANCE STORAGE AREAS
REGISTRATION INFORMATION

FACILITY NAME Geocel Corp. FACILITY ID NUMBER 332

Hazardous Substance	Type of Container							Maximum Amount Stored In Any Month			Storage Location		Date	
	D	B	C	A	T	U	O				Inside	Outside	Added	Deleted
Acrylic Emulsion				X				9000	gals	lbs	X		2/10/00	
Waste Cleaning Water				X				6000	gals	lbs	X		2/10/00	
Odor Mask			X					28	gals	lbs	X		2/10/00	
Combustible Solvents				X				18000	gals	lbs		X	2/10/00	
Silane	X							55	gals	lbs	X		2/10/00	
NOPCO	X							55	gals	lbs	X		2/10/00	
Texanol	X							220	gals	lbs	X		2/10/00	
Kerosene	X							55	gals	lbs	X		2/10/00	
Polysat AMR	X							275	gals	lbs	X		2/10/00	
Used Solvents	X							220	gals	lbs	X		2/10/00	
PM Acetate	X							55	gals	lbs	X		2/10/00	
Indopol	X							330	gals	lbs	X		2/10/00	
DIDP		X						100	gals	lbs	X		2/10/00	
Diisodecyl Phtalate					X			2190	gals	lbs	X		2/10/00	
Ammonium hydroxide	X							220	gals	lbs	X		2/10/00	
Hydraulic Oil	X							495	gals	lbs	X		2/10/00	
Perchloroethylene	X							330	gals	lbs	X		2/10/00	
Ethylene Glycol	X							110	gals	lbs	X		2/10/00	
Santicizer 160	X							165	gals	lbs	X		2/10/00	
Hercules RES A-2538	X							990	gals	lbs	X		2/10/00	
Crosslinking Agent							X	20	gals	lbs	X		2/10/00	
Mineral Spirits	X							55	gals	lbs	X		2/10/00	
Latex Emulsion					X			2400	gals	lbs	X		2/10/00	
									gals	lbs				
									gals	lbs				
									gals	lbs				
									gals	lbs				
									gals	lbs				
									gals	lbs				
									gals	lbs				

Container type: D – drum, B – bucket, C – can, A – above ground storage tank, T – tote, U – underground storage tank, O – other

1/00

White – ECHD Yellow - Facility

1-11-99

ELKHART COUNTY
GROUND WATER PROTECTION ORDINANCE
INSPECTION FORM

ID NUMBER 332 DATE 1/5/99 PAGE 1 OF 3

BUSINESS NAME Geocel Corp.

ADDRESS 53280 Marina Dr. Elkhart ZIP 46514

PHONE NUMBER 264-0645 CONTACT NAME Bill Grashorn

CHECK ALL APPLICABLE:

[X] SEPTIC [ ] DRYWELL [ ] CITY SEWER [ ] OTHER

[X] FLOOR DRAINS self-contained - pumped to holding tank (600gal AST

[X] STORAGE OF HAZARDOUS OR TOXIC SUBSTANCES (SEE INVENTORY)

[X] WASTE WATER CHARACTERIZATION PROVIDED / NEXT DUE 3/2003

EXEMPTIONS: [ ] REGISTRATION [ ] W.W.C. CLASS 1 NEXT INSPECTION 1/200x

CODE	INV.#	VIOLATION	COMPLIANCE TIME/DATE	COMPLETED
		No Violations		

Christie J. Mills
ENVIRONMENTALIST

William Grashorn
FACILITY CONTACT PERSON

REINSPECTION DATE _____ INITIALS _____

*COMPLIANCE WITH THE ELKHART COUNTY GROUND WATER PROTECTION ORDINANCE DOES NOT EXEMPT THIS FACILITY FROM ANY OTHER FEDERAL, STATE OR LOCAL LAWS, CODES OR REGULATIONS.

074

ELKHART COUNTY
GROUND WATER PROTECTION ORDINANCE
HAZARDOUS/TOXIC SUBSTANCE INVENTORY

COMPANY NAME Geocel Corp **Date** 1/5/99

	SUBSTANCE	LOCATION	AMT	CPCTY	CONTAINER	COMPLY
1.	Acrylic Emulsion	Inside - Receiving	1	6000 gal	AST	Y
2.	Acrylic Emulsion	"	1	3000 gal	AST	Y
3.	Waste cleaning water	"	1	6000 gal	AST	Y
4.	Polysat AMR 50	"	37	55 gal	drum	Y
5.	PM Acetate	"	2	55 gal	drum	Y
6.	Indopol	"	29	55 gal	drum	Y
7.	DiDP	"	1	1000 lb	plastic	Y
8.	Diisodecyl Phthalate	"	1	2190 lb	plastic	Y
9.	Water base Coatings	"	32	55 gal	drum	Y
10.	Primer	"	10	5 gal	metal	Y
11.	Texanol	"	3	55 gal	drum	Y
12.	Silicone 70w	"	5	55 gal	drum	Y
13.	Bionet	"	1	55 gal	drum	Y
14.	Aqua Ammonia	"	1	55 gal	drum	Y
15.	UCAR Latex	"	3	55 gal	plastic	Y
16.	Ammonium hydroxide	"	3	10 gal	plastic	Y
17.	Cross linking Agent	"	4	5 gal	plastic	Y
18.	Odor mask	"	6	3.5 gal	metal	Y
19.	Combustible Solvents	Outside	2	5000 gal	AST	Y
20.	Combustible Solvents	"	2	4000 gal	AST	Y
21.	Silane	Inside	1	55 gal	drum	Y
22.	Nopco	"	1	55 gal	drum	Y
23.	Texanol	"	1	55 gal	drum	Y
24.	Kerosene	"	1	55 gal	drum	Y
25.	Polycat AM2	"	1	55 gal	drum	Y
26.	Used Solvents	"	2	55 gal	drum	Y

7/92 REV/KSK FACILITY COPY

ELKHART COUNTY
GROUND WATER PROTECTION ORDINANCE
HAZARDOUS/TOXIC SUBSTANCE INVENTORY

COMPANY NAME Geocel Corp. **Date** 1/5/99

	SUBSTANCE	LOCATION	AMT	CPCTY	CONTAINER	COMPLY
1.	Hydraulic oil	Inside	2	55 gal	drum	Y
2.						
3.						
4.						
5.						
6.						
7.						
8.						
9.						
10.						
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26.						

CAS-CHEM
LABORATORIES INCORPORATED
1712 Ira Turpin Way, NE • Canton, OH 44705
TEL: (330) 588-TEST • FAX: (330) 588-8412

- REPORT OF ANALYSIS -

MIDDLEBURY SEPTIC, INC.
16403 COUNTY ROAD 108
BRISTOL, IN 46507

Client ID: 5067

CasChem Lab ID: 9810140727
Your Sample ID: Grab
Sample Type: Water
Project Name: Geocel
Project # :
P. O. # :

Date Sampled: 10/9/98
Time Sampled: 11:30
Date Received: 10/14/98
Time Received: 8:30
Date Reported: 10/22/98
Time Reported: 9:40

Test Group	Test	Result	Units	Detection Limit	Analysis Date
VOCL8260T	SW846_8260		Calibration Date: 10/19/98		
	Acetone	<50	ug/L	50	10/19/98
	Benzene	<5	ug/L	5	10/19/98
	Bromodichloromethane	<5	ug/L	5	10/19/98
	Bromoform	<5	ug/L	5	10/19/98
	Bromomethane	<10	ug/L	10	10/19/98
	2-Butanone	<10	ug/L	10	10/19/98
	Carbon disulfide	<10	ug/L	10	10/19/98
	Carbon tetrachloride	<10	ug/L	10	10/19/98
	Chlorobenzene	<5	ug/L	5	10/19/98
	Chloroethane	<5	ug/L	5	10/19/98
	2-Chloroethylvinyl ether	<5	ug/L	5	10/19/98
	Chloroform	<5	ug/L	5	10/19/98
	Chloromethane	<5	ug/L	5	10/19/98
	Dibromomethane	<5	ug/L	5	10/19/98
	1,1-Dichloroethane	<5	ug/L	5	10/19/98
	1,2-Dichloroethane	<5	ug/L	5	10/19/98

Results for CasChem Lab ID: 9810140727 Continued:

Test Group	Test	Result	Units	Detection Limit	Analysis Date
VOCL8260T					
	1,1-Dichloroethylene	<5	ug/L	5	10/19/98
	1,2-Dichloroethylene	<5	ug/L	5	10/19/98
	1,2-Dichloropropane	<5	ug/L	5	10/19/98
	cis-1,3-Dichloropropene	<5	ug/L	5	10/19/98
	trans-1,3-Dichloropropene	<5	ug/L	5	10/19/98
	Ethyl benzene	<5	ug/L	5	10/19/98
	2-Hexanone	<10	ug/L	10	10/19/98
	Methylene chloride	<10	ug/L	10	10/19/98
	4-Methyl-2-pentanone	<10	ug/L	10	10/19/98
	Styrene	<5	ug/L	5	10/19/98
	1,1,2,2-Tetrachloroethane	<10	ug/L	10	10/19/98
	Tetrachloroethylene	<10	ug/L	10	10/19/98
	Toluene	313	ug/L	5	10/19/98
	1,1,1-Trichloroethane	<5	ug/L	5	10/19/98
	1,1,2-Trichloroethane	<5	ug/L	5	10/19/98
	Trichloroethylene	<5	ug/L	5	10/19/98
	Vinyl acetate	<10	ug/L	10	10/19/98
	Vinyl chloride	<10	ug/L	10	10/19/98
	Xylene (Total)	<15	ug/L	15	10/19/98

Comments:

Organic solids are dry weight corrected when applicable.

Analyst

QA/QC Manager

8-27-97

ELKHART COUNTY
GROUND WATER PROTECTION ORDINANCE
INSPECTION FORM

ID NUMBER GW-332 DATE 7-24-97 PAGE 1 OF 2

BUSINESS NAME Geocel Corp.

ADDRESS 53280 Marina Dr. Elkhart ZIP 46514

PHONE NUMBER 264-0645 CONTACT NAME Bill Grashorn

CHECK ALL APPLICABLE:

[X] SEPTIC [ ] DRYWELL [ ] CITY SEWER [ ] OTHER

[X] FLOOR DRAINS self-contained - pumped to holding tank

[X] STORAGE OF HAZARDOUS OR TOXIC SUBSTANCES (SEE INVENTORY)

[X] WASTE WATER CHARACTERIZATION PROVIDED / NEXT DUE March/1998

EXEMPTIONS: [ ] REGISTRATION [ ] W.W.C. CLASS 1 NEXT INSPECTION 7/199

CODE	INV.#	VIOLATION	COMPLIANCE TIME/DATE COMPLETED	
		No Violations		

ENVIRONMENTALIST

Bill Grashorn
FACILITY CONTACT PERSON

REINSPECTION DATE _____ INITIALS _____

*COMPLIANCE WITH THE ELKHART COUNTY GROUND WATER PROTECTION ORDINANCE DOES NOT EXEMPT THIS FACILITY FROM ANY OTHER FEDERAL, STATE OR LOCAL LAWS, CODES OR REGULATIONS.

079

ELKHART COUNTY
GROUND WATER PROTECTION ORDINANCE
HAZARDOUS/TOXIC SUBSTANCE INVENTORY

COMPANY NAME Geocel Corp. **Date** 7-24-97

	SUBSTANCE	LOCATION	AMT	CPCTY	CONTAINER	COMPLY
1.	Acrylic emulsion	Inside - Receiver	1	6000gal	AST	Yes
2.	Waste cleaning late	" "	1	600gal	AST	Yes
3.	Acrylic emulsion	" "	1	3000gal	AST	Yes
4.	Polysat resin	" "	37	55gal	drums	Yes
5.	Indopol resin (Polybutene)	" "	25	55gal	drums	Yes
6.	PM Acetate	" "	2	55gal	drums	Yes
7.	Texanol	" "	2	55gal	drums	Yes
8.	Ethylene glycol	" "	2	55gal	drums	Yes
9.	Liquid ammonia	Inside - compounding	1	115gal	drum	Yes
10.	Combustible solvent	Outside - SW	2	5000gal	AST	Yes
11.	" "	" "	2	4000gal	AST	Yes
12.	Silane	Inside - compounds	1	55gal	drum	Yes
13.	Kerosene	" "	1	55gal	drum	Yes
14.	Texanol	" "	1	55gal	drum	Yes
15.	Polysat resin	" "	3	55gal	drum	Yes
16.	Mineral spirits	" "	1	55gal	drum	Yes
17.	Hydraulic oil	" "	1	55gal	drum	Yes
18.	Waste solvent	Inside - storage	50	55gal	drums	Yes
19.						
20.						
21.						
22.						
23.						
24.						
25.						
26.						

030

7/25/95

ELKHART COUNTY
GROUND WATER PROTECTION ORDINANCE
INSPECTION FORM

ID NUMBER GW-332 DATE 7/10/95 PAGE 1 OF 2

BUSINESS NAME Glocel Corp.

ADDRESS 53280 Manna Dr. Elkhart, IN. ZIP 46514

PHONE NUMBER 264-0645 CONTACT NAME William Grashorn

CHECK ALL APPLICABLE:

[✓] SEPTIC [ ] DRYWELL [ ] CITY SEWER [ ] OTHER _____

[✓] FLOOR DRAINS Self contained - pumped to holding tank

[✓] STORAGE OF HAZARDOUS OR TOXIC SUBSTANCES (SEE INVENTORY)

[ ] WASTE WATER CHARACTERIZATION PROVIDED / NEXT DUE Sept. 30, 1996

EXEMPTIONS: [ ] REGISTRATION [ ] W.W.C. CLASS 1 NEXT INSPECTION 199

CODE	INV.#	VIOLATION	COMPLIANCE TIME/DATE COMPLETED
		No violations	

Michael A. Hoover
ENVIRONMENTALIST

X William Grashorn
FACILITY CONTACT PERSON

REINSPECTION DATE _____ INITIALS _____

*COMPLIANCE WITH THE ELKHART COUNTY GROUND WATER PROTECTION ORDINANCE DOES NOT EXEMPT THIS FACILITY FROM ANY OTHER FEDERAL, STATE OR LOCAL LAWS, CODES OR REGULATIONS.

081

ELKHART COUNTY
GROUND WATER PROTECTION ORDINANCE
HAZARDOUS/TOXIC SUBSTANCE INVENTORY

PAGE 2 OF 2

COMPANY NAME Geocel Corp. **Date** 7/10/95

	SUBSTANCE	LOCATION	AMT	CPCTY	CONTAINER	COMPLY
1.	7-11 plasticizer	inside - south	2	55gal	drum	Y
2.	kerosene	inside -	1	55gal	drum	Y
3.	AMR-50	inside	1	55gal	drum	Y
4.	PM-Acetate	inside -	1	55gal	drum	Y
5.	hydraulic	inside	3	55gal	drum	Y
6.	motor oil	maintenance room	1	55gal	drum	Y
7.	power wash		1	55gal	drum	Y
8.	titanium dioxide/pigments		10	5gal	other	Y
9.	combustible solvents	outside - contain -	2	5,000	AST	Y
10.	combustible solvents	mentarea	2	4,000	AST	Y
11.	plasticizer	mixing room	2	6,000	AST	Y
12.	butene	central storage	4	55gal	drum	Y
13.	aqua ammonia	compound area	1	15gal	other	Y
14.	detergent	receiving dock	1	55gal	drum	Y
15.	acetate		3	55gal	drum	Y
16.	roof patch	"	≈40	55gal	drum	Y
17.	mineral spirits		3	55gal	drum	Y
18.	preblend resin		40	55gal	drum	Y
19.	distressed caulk		≈300	55gal	drum	Y
20.	ethylene glycol	central storage	2	55gal	drum	Y
21.	latex emulsion		1	6,000	AST	Y
22.	latex emulsion		1	3,000	AST	Y
23.	process wastewater		1	6,000	AST	Y
24.						
25.						
26.						

ELKHART COUNTY
GROUND WATER PROTECTION ORDINANCE
INSPECTION FORM

10-19-94

ID NUMBER GW-332 DATE 12-3-93 PAGE 1 OF 2

BUSINESS NAME Geocel Corp.

ADDRESS 53280 Marina Dr. Elkhart, IN ZIP 46514

PHONE NUMBER 264-0645 CONTACT NAME William Grashorn

CHECK ALL APPLICABLE:

[✓] SEPTIC [ ] DRYWELL [ ] CITY SEWER [ ] OTHER

[✓] FLOOR DRAINS self-contained - pumped to holding tank

[✓] STORAGE OF HAZARDOUS OR TOXIC SUBSTANCES (SEE INVENTORY)

[✓] WASTE WATER CHARACTERIZATION PROVIDED / NEXT DUE 9-94

EXEMPTIONS: [ ] REGISTRATION [ ] W.W.C. [✓] NONE Class V

CODE	INV.#	VIOLATION	COMPLIANCE TIME/DATE	COMPLETED

Geoff Coons
ENVIRONMENTALIST

X William Grashorn
FACILITY CONTACT PERSON

REINSPECTION DATE _____ INITIALS _____

*COMPLIANCE WITH THE ELKHART COUNTY GROUND WATER PROTECTION ORDINANCE DOES NOT EXEMPT THIS FACILITY FROM ANY OTHER FEDERAL, STATE OR LOCAL LAWS, CODES OR REGULATIONS.

033

1/93 ANT EGWP COPY

ELKHART COUNTY
GROUND WATER PROTECTION ORDINANCE
HAZARDOUS/TOXIC SUBSTANCE INVENTORY

COMPANY NAME Geocel

	SUBSTANCE	LOCATION	AMT	CPCTY	CONTAINER	COMPLY
1.	latex emulsion	central storage area	1	6000gal	AST	Y
2.	latex emulsion	" "	1	3000gal	AST	Y
3.	process wastewater	" "	1	6000gal	AST	Y
4.	butene	" "	6	55gal	drum	Y
5.	an acetate	" "	4	55gal	drum	Y
6.	mineral spirits	" "	4	55gal	drum	Y
7.	ethylene glycol	" "	4	55gal	drum	Y
8.	petroleum distillates	mixing room	1	55gal	drum	Y
9.	plasticizer		1	55gal	drum	Y
10.	petroleum-based solvent		1	55gal	drum	Y
11.	kerosene		1	55gal	drum	Y
12.	hydraulic oil		7	55gal	drum	Y
13.	pigments	compressor room	30	5gal	other	Y
14.	combustible solvents	caustic-containment area	2	5000gal	AST	Y
15.	combustible solvents	" "	2	4000gal	AST	Y
16.	plasticizer	mixing room	2	6000gal	AST	Y
17.						
18.						
19.						
20.						
21.						
22.						
23.						
24.						
25.						
26.						

ELKHART COUNTY
GROUND WATER PROTECTION ORDINANCE
INSPECTION FORM

ID Number GW-332 Date 1-20-92

Name of Business Geocel

Owner/Operator William Grashorn

Address 53280 Marina Dr, Elkhart Zip 46514

Phone Number 264-0645

Is this facility registered with the ECHD? (Y) N

Is this facility a laboratory? (Y)* N

Has SARA information been provided to ECHD? (Y) N

Does facility have any areas regulated by RCRA? (Y) N

Are registration records being maintained? (Y) N

I On- Site Waste Water Disposal Systems: N/A

A.

	Type	Location	Flow Rate	Working Properly	
1.	Septic	NE Corner Bldg.	1 to employees	(Y)	N
2.				Y	N
3.				Y	N

B. Has waste water characterization been provided by a qualified laboratory for the current year?

	Provided		Qual. Lab		Results and Comments
1.	Y	(N)	Y	N	
2.	Y	N	Y	N	
3.	Y	N	Y	N	

165

* laboratory contained w/in facility

II. Storage of hazardous/toxic substances:

A. Location

Substance	Class	Location	Amt	Type of Container	Ade-quate?
"toxic" raw material solvents	I C R T	southwall/batching area	8	55 gal	(Y) N
hydraulic oil	I C R T	" "	2	55 gal	(Y) N
~~pa~~ hydraulic oil	I C R T	pump room	2	" "	(Y) N
batching area solvent - mixing tank upstairs	I C R T		1	5 gal	(Y) N
pigments	I C R T		2	55 gal	(Y) N
pigments	I C R T		32	5 gal	(Y) N
Ammonia	I C R T		1	55 gal	(Y) N
"Blankophor"	I C R T		1	10 gal	(Y) N
engine glycol	I C R T		1	55 gal	(Y) N
	I C R T				Y N
	I C R T				Y N
	I C R T				Y N
	I C R T				Y N
	I C R T				Y N
	I C R T				Y N
	I C R T				Y N
	I C R T				Y N
	I C R T				Y N
	I C R T				Y N
	I C R T				Y N

B. Explain if storage is not adequate: _____

III. Above Ground Storage Tanks (AST's) N/A

A. Is AST stored inside or outside? (1.) Inside Outside
2. Inside Outside

B. Product in AST 1. (2) 500 gal aromatic hydrocarbons
2. (2) 500 gal " "

C. Describe AST (age, condition, material, structure)

20' x 50' x 4' concrete containment w/ manual sump to empty precipitation

D. Describe underlying surface: concrete/asphalt

E. Is secondary containment provided? 1. (Y) N
2. Y N

Describe (type, size, drainage) approximately 30,000 gal containment capacity provided for ASTs

F. Recommendations: secondary containment adequate

IV. Discharge Notification N/A

A. Have any spills occurred at this facility? Y (N)

Date_____ Substance_____

Quantity_____ Location_____

B. Was spill reported to State and Local Officials?

V. Variances

A. Have any variances been approved by ECHD? Y N

Geoffrey Downie 1-20-92

Environmentalist Date

Williams Grafton

Responsible Party
(Owner/Operator or Contact Person)

ELKHART COUNTY HEALTH DEPARTMENT

Environmental Health Services

4230 Elkhart Road
U.S. 33 & C.R. 26
Goshen, Indiana 46526
(219) 875-3391

Frederick W. Bigler, M.D.
Health Officer

October 14, 1994

Geocel Corp.
53280 Marina Dr.
Elkhart, IN 46514

COPY

ATTN: William Grashorn

Dear Mr. Grashorn:

The purpose of this correspondence is to inform you that our office has considered your request for an extension on your due date on your next wastewater characterization. Since Elkhart County's re-authorized Groundwater Protection Ordinance now requires testing once every five years, this department has extended your due date to September 30, 1996. If you have any further questions in this regard, please don't hesitate to call.

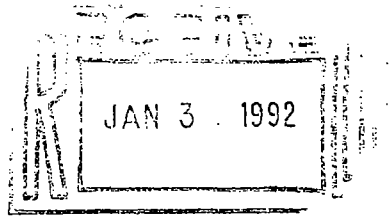
Sincerely,

Geoff Downie

Geoff Downie
Environmentalist III

GD/ng

Geocel®
Corporation
P.O. 398, Elkhart, Indiana 46515
Phone: (219) 264-0645
Fax: (219) 264-3698



January 28, 1992

Mr. Geoffrey Downie
Environmentalist II
Elkhart County Health Dept.
22830 U.S. 33
Goshen, IN 46526

Dear Mr. Downie:

From your letter dated January 21, 1992, I understand that we must submit an annual waste characterization of our septic waste. In particular, sampling and testing for volatile organic compounds this year. I will schedule the waste profile analysis this summer the next time we pump our septic. I trust this will be acceptable.

Please inform me if I have any further requirements.

Sincerely,

William W. Grashorn

William W. Grashorn
Director of Operations

WWG/p

cc: Don L. Krabill

ELKHART
COUNTY
HEALTH
DEPARTMENT

Environmental Health Services

22830 U.S. 33
Goshen, Indiana 46526
(219) 875-3391

Frederick W. Bigler, M.D.
Health Officer

January 21, 1992

Geocel
Attn: William Grashorn
53280 Marina Drive
Elkhart, IN 46514

Dear Mr. Grashorn:

On January 20, 1992, your facility was inspected by a representative of the Elkhart County Health Department (ECHD) to ensure the compliance with the Elkhart County Ground Water Protection Ordinance. All hazardous and toxic substances at your facility were found to be appropriately stored.

Since your facility does utilize an on-site waste water disposal system and you store toxic and hazardous substances, you will be required to submit an annual waste water characterization. The appropriate test for your system is a Volatile Organic Compound (VOC) analysis. Please respond in writing within thirty (30) calendar days to inform the ECHD of your intentions in this matter.

Please keep all pertinent documentation on file at your facility for a period of no less than three (3) years. Please do not hesitate to contact me with any questions or concerns.

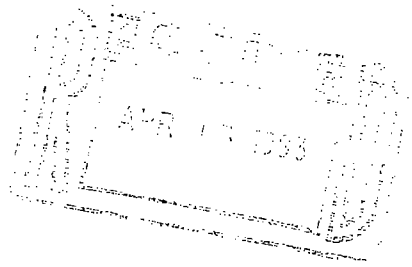
Sincerely,

Geoffrey Downie
Environmentalist II

GD/sf

COPY

Geocel®
Corporation
P.O. 398, Elkhart, Indiana 46515
Phone: (219) 264-0645
Fax: (219) 264-3698



9-28-93

April 12, 1993

Mr. Geoffrey Downie
Environmentalist II
Elkhart County Health Department
22830 U.S. 33
Goshen, IN 46526

Dear Mr. Downie:

In accordance with the Elkhart County Ground Water Protection Ordinance, I am submitting our annual waste water characterization of our septic tank.

Attached you will find the VOC analysis collected on March 30, 1993, with results from SER Oil Services. I trust this will satisfy our requirement under the Ground Water Protection Ordinance.

If you have any questions please call.

Sincerely,

William W. Grashorn

William W. Grashorn
Director of Operations

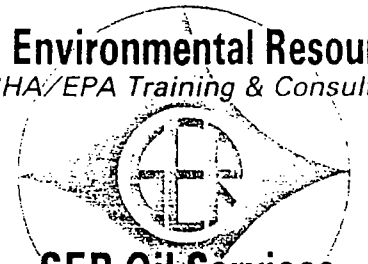
WWG/p
enclosure

cc: Don L. Krabill

1122 DIVISION ST.
P.O. BOX 582
MISHAWAKA, IN 46544
PHONE: (219) 258-0507
(219) 674-0450

Safety & Environmental Resources, Inc.

OSHA/EPA Training & Consulting



SER Oil Services

Waste Oil/Water Processing
Specialty Products

DAN WILSON
PRESIDENT

DAN SCHROEDER
GENERAL MANAGER

LABORATORY REPORT

CLIENT: Geocel
ATTN: Bill Grasshorn
53280 Marina Dr.
Elkhart, IN 46514

REPORT: A0311

PROJECT/SITE: Geocel Sepic Tanks

SAMPLES SUBMITTED: Two liquid sample(s) for VOC analysis.

COLLECTED: 3-30-93 BY: JF RECEIVED: 3-31-93

REPORT SUMMARY:

Volatile Organic Compounds (VOCs) are analyzed by a Gas Chromatograph (GC) using the EPA Method 8021.

The purge and trap system, Method 5030, is utilized to separate the VOCs for the sample matrix and thermally desorbed into the GC. VOC detection is accomplished by a Photoionization Detector (PID) and an Electrolytic Conductivity Detector (ELCD) in series. Purging of known concentrations of standards are interpreted by the PID/ELCD in order to identify the unknown coumpunds.

The detection limits of this method is 1.0 parts per billion (ppb).

Detailed results of the analysis are presented on the following page.

If you have any questions or comments concerning this report, please do not hesitate to call us at (219) 258-0507.

APPROVED BY: John Howard DATE: April 1, 1993

"Serving Your Future"

ANALYTICAL RESULTS

CLIENT: Geocel
ANALYSIS DATE: 3-31-93
SAMPLE DESCRIPTION: Septic Tank (A0311)

Volatile Organic Compound	DL ug/L	Results	Volatile Organic Compound	DL ug/L	Result
Benzene	1	N.D.	2,2-Dichloropropane	1	N.D.
Bromobenzene	1	N.D.	1,1-Dichloropropene	1	N.D.
Bromochloromethane	1	N.D.	cis-1,3-Dichloropropene	1	N.D.
Bromodichloromethane	1	BDL	trans-1,3-Dichloropropene	1	N.D.
Bromoform	1.6	N.D.	Ethylbenzene	1	[redacted]
Bromomethane	1.1	N.D.	Hexachlorobutadiene	1	N.D.
n-Butylbenzene	1	[redacted]	Isopropylbenzene	1	[redacted]
sec-Butylbenzene	1	[redacted]	p-Isopropyltoluene	1	[redacted]
tert-Butylbenzene	1	N.D.	Methylene Chloride	1	[redacted]
Carbon Tetrachloride	1	N.D.	Naphthalene	1	BDL
Chlorobenzene	1	N.D.	n-Propylbenzene	1	[redacted]
Chloroethane	1	N.D.	Styrene	1	[redacted]
Chloroform	1	N.D.	1,1,1,2-Tetrachloroethane	1	N.D.
Chloromethane	1	N.D.	1,1,2,2-Tetrachloroethane	1	N.D.
2-Chlorotoluene	1	N.D.	Tetrachloroethene	1	N.D.
4-Chlorotoluene	1	N.D.	Toluene	1	[redacted]
Dibromomethane	1	N.D.	1,2,3-Trichlorobenzene	1	N.D.
1,2-Dibromo-3-Chloropropane	3	N.D.	1,2,4-Trichlorobenzene	1	N.D.
1,2-Dibromoethane	1	N.D.	1,1,1-Trichloroethane	1	N.D.
Dibromomethane	2.2	N.D.	1,1,2-Trichloroethane	1	N.D.
1,2-Dichlorobenzene	1	N.D.	Trichloroethene	1	BDL
1,3-Dichlorobenzene	1	N.D.	Trichlorofluoromethane	1	N.D.
1,4-Dichlorobenzene	1	BDL	1,2,3-Trichloropropane	1	N.D.
Dichlorodifluoromethane	1	N.D.	1,2,4-Trimethylbenzene	1	[redacted]
1,1-Dichlorethane	1	N.D.	1,3,5-Trimethylbenzene	1	[redacted]
1,2-Dichlorethane	1	N.D.	Vinyl Chloride	1	N.D
1,1-Dichloroethene	1	N.D.	m&p-Xylenes	1	[redacted]
cis-1,2-Dichoroethene	1	[redacted]	o- Xylenes	1	N.D.
trans-1,2-Dichloroethene	1	N.D.			
1,2-Dichloropropane	1	N.D.			
1,3-Dichloropropane	1	[redacted]			

Comments:

DL - Detection Limit
N.D. - Not Detected
BDL - Below Detection Limits
ug/L - Parts per Billion
* mg/L - Parts per Millon

Geocel®
Corporation
P.O. 398, Elkhart, Indiana 46515
Phone: (219) 264-0645
Fax: (219) 264-3698

E

May 4, 1992

Mr. Geoffrey Downie
Environmentalist II
Elkhart County Health Department
22830 U.S. 33
Goshen, IN 46526

Dear Mr. Downie:

In accordance with the Elkhart County Ground Water Protection Ordinance, I am submitting our annual waste water characterization as requested in your letter to me dated January 20, 1992.

Attached you will find the VOC analysis collected on April 4, 1992, with results from SER Oil Services dated April 27, 1992. I trust this will satisfy our requirement under the Ground Water Protection Ordinance.

If you have any questions please call.

Sincerely,

William W. Grashorn

William W. Grashorn
Director of Operations

WWG/p
enclosure

cc: Don L. Krabill

Safety & Environmental Resources, Inc.

OSHA/EPA Training & Consulting

1122 DIVISION ST.
P.O. BOX 582
MISHAWAKA, IN 46544
PHONE: (219) 258-0507
(219) 674-0450

DAN WILSON
PRESIDENT

DAN SCHROEDER
GENERAL MANAGER

SER Oil Services

Waste Oil/Water Processing
Specialty Products

LABORATORY REPORT

CLIENT: Geocel
ATTN:
53280 Marina Drive
Elkhart, IN 46514

REPORT: EIS 7.D

PROJECT/SITE: Groundwater Ordinance

SAMPLES SUBMITTED:
One septic sample
for VOC analysis.

COLLECTED: 4/08/92 BY: KAP

RECEIVED: 4/08/92

REPORT SUMMARY

Volatile Organic Compounds (VOC) are analyzed by purge & trap, GC/MS procedure. VOC of interest are purged from the matrix along with an internal standard (IS) by the purge & trap. The effluent from the gas chromotograph is monitored by either mass spectrograph.

EPA Method 8240 is used to detect the VOC's in the septic samples submitted.

Detailed results are presented on the following page.

If you have any questions or comments concerning this report, please do not hesitate to call us at (219) 258-0507.

APPROVED BY: John Howard

DATE: April 27, 1992

ANALYTICAL RESULTS

SAMPLE DESCRIPTION: Geocel

Volatile Organic Compound	DL ug/L	Results	Volatile Organic Compound	DL ug/L	Result
Benzene	1	N.D.	2,2-Dichloropropane	1	N.D.
Bromobenzene	1	N.D.	1,1-Dichloropropene	1	N.D.
Bromochloromethane	1	N.D.	cis-1,3-Dichloropropene	1	N.D.
Bromodichloromethane	1	N.D.	trans-1,3-Dichloropropene	1	N.D.
Bromoform	1.6	N.D.	Ethylbenzene	1	N.D.
Bromomethane	1.1	N.D.	Hexachlorobutadiene	1	N.D.
n-Butylbenzene	1	N.D.	Isopropylbenzene	1	N.D.
sec-Butylbenzene	1	N.D.	p-Isopropyltoluene	1	N.D.
tert-Butylbenzene	1	N.D.	Methylene Chloride	1	N.D.
Carbon Tetrachloride	1	N.D.	Naphthalene	1	N.D.
Chlorobenzene	1	N.D.	n-Propylbenzene	1	N.D.
Chloroethane	1	N.D.	Styrene	1	1.59
Chloroform	1	N.D.	1,1,1,2-Tetrachloroethane	1	N.D.
Chloromethane	1	N.D.	1,1,2,2-Tetrachloroethane	1	N.D.
2-Chlorotoluene	1	N.D.	Tetrachloroethene	1	5.80 –
4-Chlorotoluene	1	N.D.	Toluene	1	21.9
Dibromomethane	1	N.D.	1,2,3-Trichlorobenzene	1	N.D.
1,2-Dibromo-3-Chloropropane	3	N.D.	1,2,4-Trichlorobenzene	1	N.D.
1,2-Dibromoethane	1	N.D.	1,1,1-Trichloroethane	1	N.D.
Dibromomethane	2.2	N.D.	1,1,2-Trichloroethane	1	N.D.
1,2-Dichlorobenzene	1	N.D.	Trichloroethene	1	N.D.
1,3-Dichlorobenzene	1	N.D.	Trichlorofluoromethane	1	N.D.
1,4-Dichlorobenzene	1	N.D.	1,2,3-Trichloropropane	1	N.D.
Dichlorodifluoromethane	1	N.D.	1,2,4-Trimethylbenzene	1	N.D.
1,1-Dichlorethane	1	N.D.	1,3,5-Trimethylbenzene	1	N.D.
1,2-Dichlorethane	1	N.D.	Vinyl Chloride	1	N.D
1,1-Dichloroethene	1	N.D.	Total Xylenes	1	7.41
cis-1,2-Dichoroethene	1	N.D.	Acetone	1	199
trans-1,2-Dichloroethene	1	N.D.	2-Butanone	1	151 –
1,2-Dichloropropane	1	N.D.	4-Methyl-2-Pentanone	1	16.8 –
1,3-Dichloropropane	1	N.D.			

Comments:

DL - Detection Limit
N.D. - Not Detected
BDL - Below Detection Limits
ug/L - Parts per Billion
* mg/L - Parts per Million

HAZ SUB.

GW SECT. A[illegible]

File

ELKHART COUNTY COMPLAINT FORM

Date: 1/24/87 Department: Health Taken By: M. [illegible]

~~Location: N.S.E.W. side/cor. of~~ off CR 6 ~~mi./ft. N.S.E.W.~~ side/cor. of

Address: 53280 Marina Twp: Oslo Zone:

Complaint: "Recycled" water being used to clean machines - smells very bad. Unknown disposal of water (not in sewer). Water being "cleaned" by distiller in middle of plant. Best time to visit is before 2:00 pm

Property Owner: Georel Corp. Telephone Number: UNK

Address: 53280 Marina

Referral - Department: Date:

Conditions Found: 2-3-87, MET W/ PLANT MGR. LARRY STICKEL. FOR [illegible] WEEK THEY WERE HEATING [illegible] (CONTAINS - $CaCO_3$, STODDART SOLVENT, ETHYLENE GLYCOL, EPOXY) DRUMS OF CLEANING WATER TO EVAPORATE EXCESS LIQUID. THE SMOKE [illegible] EMPLOYEES [illegible] they had no [illegible] for ventilation. They have discontinued until they get ventilation and to work under waste water is hauled away by "A-1" WASTE HAULERS and is proper [illegible] MANIFEST D. Spilman - ECHD WASTEBUSTER

Action:

Reinvestigation: Closed: 2-3-87

By: Return Call Requested: Yes No

Reported By: UNKNOWN

Address:

Telephone Number:

057

(11-22-81)

ECHD CODE 132-255

ELKHART COUNTY HEALTH DEPARTMENT

GROUNDWATER PROTECTION PROGRAM

VOLUNTARY COMPLIANCE SURVEY

Ruhe Grain Corp

1. DATE: 8/5/86

2. SIC NUMBER(S): _____

3. RCRA EPA I.D.NUMBER: (SQG* (G) GSTD) IND 069 763 639

4. RCRA CLASSIFICATION

A. 100 TO 1000 Kg Generator (SQG)_____ _____
B. > 1000 Kg Generator (G)_____ ✓
C. Generator, Treatment, Storage, and Disposal(GTSD)_ _____
D. Non-Notifier_____ _____

5. DESCRIPTION OF OPERATION _____

_____

RCRA REQUIRED PRACTICES

6. (SQG$ G GTSD) PERCENTAGE OF HAZARDOUS WASTE CONTAINERS LABELLED PER RCRA REQUIREMENTS?

100 % (8 of 8) Remarks _____

7. (G GTSD) HAZARDOUS WASTE STORAGE CONTAINERS OF REACTIVE OR IGNITABLE WASTE STORED 50 FT. OR MORE INSIDE PROPERTY LINE PER RCRA REQUIREMENTS?

Yes___ No ____ Remarks _____

8. (SQG$ G GTSD) ARE AISLES ADEQUATE FOR MOVEMENT OF PERSONNEL AND EMERGENCY EQUIPMENT PER RCRA REQUIREMENTS?

Yes ✓ No ____ Remarks _____

9. (GTSD)ARE "DANGER" SIGNS POSTED PER RCRA REQUIREMENTS?

Yes___ No ____ Remarks _____

10. (GTSD)ARE "NO SMOKING" SIGNS POSTED PER RCRA REQUIREMENTS?

Yes___ No ____ Remarks _____

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* Applicable on Sept. 22, 1986 $ Applicable on March 22, 1986

11. (SQG$ G GTSD) IS THERE "FIRE CONTROL" EQUIPMENT AVAILABLE PER RCRA REQUIREMENTS?

Yes___ No ____ Remarks _____

12. (SQG$ G GTSD) IS THERE SPILL CONTROL EQUIPEMENT AVAILABLE PER RCRA REQUIREMENTS?

Yes___ No ____ Remarks _____

13. (SQG$ G GTSD) IS EMERGENCY INTERNAL COMMUNICATIONS/ALARM SYSTEMS ADEQUATE PER RCRA REQUIREMENTS?

Yes___ No ____ Remarks _____

14. (GTSD)IS HAZARDOUS WASTE STORAGE AREA ENTRY CONTROLLED?

Yes ____ No _____

15. HAZARDOUS WASTE HANDLING PRACTICES (NOT RCRA REGULATED AREA)

A. Is there evidence of spills in the hazardous waste handling areas?

Yes___ No____

If Yes: (1) Near Drums? Yes___ No____
(2) Near Above Ground Storage Tanks? Yes___ No____
(3) Near UST (Suspected Overfill)? Yes___ No____

Comments_____

_____

B. Is there evidence of run-off in hazardous waste handling areas?

Yes___ No____

If Yes: (1) Near Drums? Yes___ No____
(2) Near Above Ground Storage Tanks? Yes___ No____
(3) Near UST (Suspected Overfill)? Yes___ No____

Comments_____

_____

16. HAZARDOUS WASTE STORAGE AREA SURFACE TYPE (NOT RCRA REGULATED)

Concrete _____ Asphalt _____ Gravel _____

Wood_____ Dirt_____

* Applicable on Sept. 22, 1986 $ Applicable on March 22, 1986

HAZARDOUS WASTE DISPOSAL ACTIVITIES

17. HOW LONG IS HAZARDOUS WASTE STORED ON SITE? 5/86 earliest Date

18. IS HAZARDOUS WASTE HAULED OFF-SITE? Yes ____ No _____

If Yes, Name of Hauler_____

(SQG* G GTSD) Is waste properly manifested? Yes ____ No _____

If Yes, Date of Earliest Manifest _____ 19____

Date of Latest Manifest _____ 19____

a. (G GTSD) Is there a Biennial Report on file(EPA Form 8700-13B)?

Yes ____ No _____

If not being hauled off-site, where is it being disposed of at?

_____

_____

RCRA REPORTING REQUIREMENTS

19. (G GTSD)DOES THIS FACILITY HAVE A RCRA CONTINGENCY/EMERGENCY PLAN?

Yes ___ No ____ If Yes:

Is the plan on file with local emergency response facilities?

Yes ___ No ____ Agency _____

A. (SQG*), DOES IT:

a) Have an Designated Emergency Coordinator? Yes ___ No ____

If Yes, Name and Title _____

_____

b) Have the following next to phone?

Emergency Coordinators name and phone number? Yes ___ No ___

Location of Fire and Spill Control Equipment? Yes ___ No ___

Phone number of Fire Department? Yes ___ No ___

c) Insure that employees are familar with waste handling and emergency procedures relavent to the job performed?

Yes ___ No ___

* Applicable on Sept. 22, 1986 $ Applicable on March 22, 1986

20. (G GTSD) ARE RCRA PERSONNEL TRAINING RECORDS ON FILE?

Has new form w/ Yes ✓ No ___

If Yes: Are job descriptions for personnel dealing with hazardous waste included?

Yes ✓ No ___

21. (GTSD) ARE INSPECTION LOGS KEPT FOR DAILY INSPECTIONS OF AREAS SUBJECT TO SPILLS?

Yes ___ No ____

22. (SQGS G GTSD) ARE INSPECTION LOGS KEPT FOR WEEKLY INSPECTIONS OF HAZARDOUS WASTE CONTAINERS?

Yes ___ No ____

23. (GTSD) DOES INSPECTION SCHEDULE IDENTIFY THE TYPES OF PROBLEMS TO BE LOOKED FOR DURING INSPECTIONS?

Yes ___ No ____

24. (GTSD) HAS A FACILITY CLOSURE PLAN BEEN DEVELOPED? Yes ___ No ____

If Yes, where is it filed? _____

NOTES_____

Jeff B. told Geocel that they didn't need inspection log - check reasoning to find out why (?)

Just inspected by Jeff ow 8/1/86

* Applicable on Sept. 22, 1986 $ Applicable on March 22, 1986

Max
Originator

PHONE CONVERSATION RECORD

Conversation with:
Name: Jeff Blankenberger
Company: ISBH
Address:

Phone:
Subject: Stoutco / Geocel

Date: 11 / 5 / 85
Time: 9:30 AM/PM

☐ Originator Placed Call
☒ Originator Received Call

Notes: (1) Jeff called to let me know
That on Friday he will go to Stoutco.
Stoutco followed Survey Advice and asked
ISBH to change status from Gen to SQG
ISBH inspection required so Jeff up
to do it —

Also

(2) Found out Geocel due for RCRA
inspection soon —
Told him I had rec'd call (white lie
knew from Survey) that Geocel over 90 day
& having trouble getting OK from ISBH to
dispose — Chem Waste Man taking over for SQ
at Adams Center FW — requires another waste anal.
— no info back ISBH ok to dispose there —

Jeff said Geocel due for RCRA soon —
will wait a bit

☒ File ________
___/___/___

☐ Follow-Up By:

☐ Copy/Route To:

Follow-Up-Action:

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Originator's Initials

Max
Originator

PHONE CONVERSATION RECORD

Conversation with:

Name: Larry Stickel

Company: Geocel

Address:

Phone: 264-0645

Date: 11 / 5 / 85

Time: 9:45 AM/PM (AM circled)

☐ Originator Placed Call

☐ Originator Received Call

Subject: RCRA Vios Observed Survey

Notes:
— Asked Larry about Progress on >90 days
— Said he had Rec'd Letter today from Ralph Picard
Haz Waz Man Sect Saying unsuitable
due to flammability to land dispose → Requires
Incineration —
~~Told him he hadn't had R~~
Told him it looked like it had been awhile since
last RCRA inspection at Geocel and was probably
due for another soon —
— He said he'd get in contact with Geocel's
consultant to arrange disposal — He mentioned options he might
take
① Contest finding — so can land dispose at nearby [illegible]
② Attempt land disp in Ohio/other States
③ Incinerate — if can find incinerator that will take solid

My Comments — Get Rid of current >90 day waste
(by incin. if necessary) & contest
later
— Straighten out other RCRA Viols
stickel 3 high / labels / file out
Stickel cooperative / only Rec'd info on FSBH analysis today
Going as fast as info comes in

☒ File

Follow-Up-Action:

__ / __ / __

☐ Follow-Up By: Stickel — to call with option selected

☐ Copy/Route To:

Originator's Initials: MDM

Elkhart County Health Department

2400 ELKHART ROAD
GOSHEN, INDIANA 46526
PHONE: (219) 534-1404

STAN REEDY, M.D., M.P.
HEALTH OFFICER

October 8, 1985

Mr. Larry Stickel
Geocel Corporation
P.O. Box 398
53280 Marina Drive
Elkhart, IN 46515

Dear Larry:

This letter will serve as a follow-up to the survey I conducted of Geocel on September 25, 1985.

You are encouraged to maintain a regular inventory of underground storage tank contents, as well as perform periodic pressure testing, to assure against leaks in these tanks. The Kent-Moore pressure test appears the only acceptable method. Serious incidents of groundwater contamination have resulted from leaking underground storage tanks. State and federal law will likely soon require the performance of inventories and testing.

Also, Geocel was observed to be in less than full compliance with many RCRA hazardous waste handling regulations. Enclosed is a list of a few of the RCRA requirements for hazardous waste generators. Those requirements which Geocel is currently failing to meet have been highlighted.

It remains the intent of this office to protect our vital groundwater resource. We must rely on the assistance of local industry. We would appreciate further contact with your firm concerning the above mentioned items. Should you have any further concerns, do not hesitate to contact our office at 523-2272.

Sincerely,

Max D. Michael
Groundwater Protection Specialist

MDM/rjw
Enclosure

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Elkhart County Health Department

2400 ELKHART ROAD
GOSHEN, INDIANA 46526
PHONE: (219) 534-1404

STAN REEDY, M.D., M
HEALTH OFFICEI

GROUNDWATER PROTECTION SECTION

SUGGESTED COMPLIANCE ACTION

COMPANY NAME Geocel Corporation

ADDRESS PO Box 398 53280 Marina Drive

CONTACT'S NAME Larry Stickel TELEPHONE NUMBER 264-0645

	GENERATOR	TRANSPORTER	TREATMENT	STORAGE	DISPOSAL
CHECK FACILITY TYPE (X or N/A)	✓	—	—	—	—
CHECK AREAS NEEDING IMPROVEMENT	✓	—	—	—	—

EPA IDENTIFICATION NUMBER IND 069763639

NEEDED IMPROVEMENTS	COMPANY ACTION	HEALTH DEPT. FOLLOW-
⊖ Aisle space + Stacking (Pallets 3 high)		⊖ Check Stacki[ng] Limits
⊖ Inspection Logs Daily for Areas subject to spills weekly for containers I.D. Problems		⊖ Check Aisle space Exemption
⊖ Personnel Training needs to include Job Descriptions + the words Hazardous waste		⊖ Check Dating [illegible] ISBH in D[illegible] for Chem waste, To Accept [illegible]
⊖ Hazardous waste labelling incomplete on 10% containers		[owner ch[ange] from SCA to Chem wast[e]

⊖ Over 90 day accumulation time

man necessitated Re[illegible] of was[te]

COMMENTS: Annual UST pressure check Oct 7 MAM

Signature [signature] Date 9/25/85 Signature ____________ Date ____

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ECHD CODE 132-25

2:30
6:00

ELKHART COUNTY HEALTH DEPARTMENT

GROUNDWATER PROTECTION PROGRAM

Rethe Wood Corp

INDUSTRIAL SURVEY

1. DATE: 9/25/85

2. SIC NUMBER(S): ~~37~~ 26

3. RCRA EPA I.D. NUMBER: IND 069763639 NO ____ N/A ____

4. RCRA CLASSIFICATION

A. Generator (G)	(Yes) X	No ____	
B. Transporter (Tr)	~~Yes~~ ____	No ____	
C. Treatment (Tt)	Yes ____	No ____	
D. Storage (S)	Yes ____	No ____	
E. Disposal (D)	Yes ____	No ____	
F. Abbreviation	G/__/__/__/__		
G. Non-Notifier	Yes ____	No X	
H. Future SQG ?	Yes ____	No ____	N/A X

5. ENVIRONMENTAL PERMITS

A. SPC-15	Yes ____	No ____	N/A ____
B. NPDES	Yes ____	No ____	N/A ____
C. SPCC	Yes ____	No ____	N/A ____
D. AIR QUALITY	Yes ____	No ____	N/A ____
E. OTHERS	Yes ____	No ____	N/A ____

If Others, explain: _____

6. DESCRIPTION OF OPERATION

(A). Manufacturing
B. Assembly
C. Metal Stamping
D. Metal Extrusions
E. Plastics/Fiberglass - Molding/Forming
F. Plating/Metal Finishing
G. Painting/Industrial Coatings

PRODUCTS RECEIVED FROM 9/15/85 TO 9/25/86

CHLORINATED SOLVENT	45,398 GAL.
AROMATIC SOLVENT (2)	78,650 GAL.
MINERAL SPIRITS	3572 GAL.

H. Printing
I. Painting/Manufacturing/Warehouse-Distribution
J. Chemical/Manufacturing/Warehouse-Distribution
K. Petroleum Products/Storage
L. Pharmaceutical Manufacturing
M. Chemical Packaging
N. Transportation
O. Furniture/Fixtures/Display Equipment
P. Instrument - Musical
Q. Instrument Measuring - Meters, etc.
R. Electronics - Equipment
S. Sporting Equipment/Accessories. etc.
T. Farm Products/Services
U. Others - Explain: Mixing

7. NUMBER OF EMPLOYEES: ?

8. PRODUCTS/SERVICES (DESCRIBE):

A. Caulking + Sealants
B.
C.
D.
E.

9. CHEMICAL RAW MATERIALS General information given only - confidentiality concern

	Chem. Type	Chem. Name	Haz Prod?	Amt Used/Yr	Physical State
A.	Xylene	Chlorinated Solvents	Yes	45,398 Gal/yr	Liq
B.	PCE	Aromatic Solvents	Yes (2 kinds)	78,650 Gal/yr	
C.	SC-100	Mineral Spirits		3572 gal/yr	
D.	7-11				
E.	160				

	Supplier	Material Safety Data Sheet
A.		Top 10 Count MSDS
B.		Generic USE into OBTained
C.		Concerned About Confidentiality
D.		

E. Ropelex

F. Comments: Mann Navy __ Chem ____ 55 gal

10. CHEMICAL RAW MATERIAL STORAGE CONTAINERS

A. Metal Drums Yes X No ____

If Yes:

(1) Number ~50
(2) Closed? Yes ✓ No ____
(3) Good Condition? Yes ✓ No ____

B. Non-Metal/Fiber Yes ✓ No ____

If Yes:

(1) Number 100
(2) Closed? Yes ✓ No ____
(3) Good Condition? Yes ✓ No ____

C. Any other containers less than 30 gallons? Yes ✓ No ____

If Yes, describe: ~100 X 5 gal

D. Above Ground Storage Tanks? Yes X No ____

If Yes, complete:

	Tank 1	Tank 2	Tank 3	Tank 4	Other
Structure	~~Steel~~ Fiberglass	~~Steel~~ Steel	~~Steel~~ Fiberglass	Steel	
Age(yrs)	6000 gal	Plasticizer	Plasticizer		
Contents	Resin	7	7	7	
Capacity	6000 ~~10,000~~	6000 ~~10,000~~	6000 ~~10,000~~	6000 ~~10,000~~	
Inv Kept?					

Comments: ~~Visual Testing / 2 UST's Repaired~~

E. Under Ground Storage Tanks? Yes X No ____

If Yes, complete:

	Tank 1	Tank 2	Tank 3	Tank 4	Other
Structure	Steel	Steel	Steel	Steel	
Age (yrs)	7	7	7	7	
Contents	Xylene	SC-100	PCE	Stoddard Solvent	Mineral spirits
Capacity	6000 ~~10,000~~	6000 ~~10,000~~	6000 ~~10,000~~	6000 ~~10,000~~	
Inv Kept?	Dip stick →	→	→	→	
Testing?	← none	→	→		
Date-Last	← Summer 1984	→	→	→	Cleaned by contractor + inspector
Type Test	Visual	In situ – man inside			

Comments: ____

11. PERCENTAGE RAW MATERIAL CONTAINERS PROPERLY MARKED:

_______ %   Comments: not USTS

12. MATERIAL HANDLING PRACTICES AND HISTORY

A. Is there evidence of material spills? Yes ____ No X

If Yes:

(1) From Drums? Yes ___ No X
(2) From Above Ground Storage Tanks? Yes ___ No X
(3) From Under Ground Storage Tanks (overfill)? Yes ___ No X

B. Is there a history of material spills? Yes X No ____

NON haz 1983 Summer Resin tank blowout

If Yes:

(1) From Drums? Yes ___ No X
(2) From Above Ground Storage Tanks? Yes X No ___
(3) From Under Ground Storage Tanks (overfill)? Yes ___ No X

C. Is there evidence of material run-off? Yes ____ No ____

If Yes:

(1) From Drums? Yes ___ No X
(2) From Above Ground Storage Tanks? Yes ___ No X
(3) From Under Ground Storage Tanks (overfill)? Yes ___ No X

D. Is there a history of material run-off? Yes ____ No X

If Yes:

(1) From Drums? Yes ___ No _/_
(2) From Above Ground Storage Tanks? Yes ___ No _|_
(3) From Under Ground Stroage Tanks (overfill)? Yes ___ No _|_

Comments: 1983 ~~was~~ ECHD on Site Resin Blowout

13. RAW MATERIAL STORAGE SURFACE AREA (ODTS/area UST 1 ft thick cap)

_X_ Concrete
___ Asphalt
___ Gravel
___ Wood
___ Dirt

Drums + ASTs inside

14. STORM DRAINS THREATENED? Yes ___ No _X_

Comments: ___

15. IS MATERIAL STORAGE AREA ENTRY CONTROLLED? Yes _X_ No ___

16. ARE MATERIAL STORAGE AREAS ENCLOSED? Yes _X_ (others) No _X_ (USTs)

If Yes, Is Emergency Ventilation Available? Yes ___ No _X_

17. ARE SECONDARY MEANS OF CONTAINMENT PROVIDED? Yes ___ No _|_

If Yes:

(1) For Drums? Yes ___ No _|_
Comments: (structure, capacity): ___

(2) For Above Ground Storage Tanks? Yes ___ No _|_
Comments: (structure, capacity): ___

(3) For Under Ground Storage Tanks? Yes ___ No _X_
Comments: (structure, capacity): ___

PLANT FEATURES:

18. ARE THERE PITS, PONDS, LAGOONS ON PROPERTY? Yes ___ No _X_

If Yes, Comments: _____

_____

19. DRINKING WATER SUPPLY:

Municipal _____ Well 1 If Well, Depth 30 ft

20. PROCESS WATER SUPPLY:

Municipal _____ Well _____ If Well, Depth _____

21. NUMBER OF WELLS ON PROPERTY:

Drinking 1 Process _____

22. SEWAGE DISPOSAL SYSTEM:

Municipal Sewer _____ Private Septic X

23. ANY DRYWELLS THAT ARE NOT PART OF A SEPTIC SYSTEM? Yes ____ No X

If Yes, Describe: _____

_____

PROCESSES

24. HOW ARE RAW MATERIALS USED?

_____ Applied as received

X Mixed/Blended for on-site use
Explain: _____

X Packaged for re-sale/distribution
Explain: _____

_____ Other uses
Explain: _____

WASTES AND HAZARDOUS WASTES

25. ARE SOLID, LIQUID, OR HAZARDOUS WASTES GENERATED? Yes X No ____

If Yes, List all wastes generated: Hazardous Waste?

A. off spec Solvent Based Caulk Yes X No ____

B. Wash water from Acrylic — is manifested out Yes ____ No X

C. ____ Yes ____ No ____

D. ____ Yes ____ No ____

Comments: ____

26. IS CONTACT WASTEWATER GENERATED? Yes X No ____

If Yes, Is it discharged by:

A. Municipal sewer system after pretreatment? Yes ____ No ____

B. Municipal sewer system without pretreatment? Yes ____ No ____

C. Exempt from pretreatment? Yes ____ No ____

D. Septic system? Yes ____ No ____

E. Drywell not part of septic system? Yes ____ No ____

F. Deep-Well Injection? Yes ____ No ____

G. Lagoon/Pond? Yes ____ No ____

H. Is discharge approved by appropriate agency? Yes ____ No ____

Comments: ____

I Hauled out See B

27. IS ~~NON~~-CONTACT PROCESS WASTEWATER GENERATED? Yes ____ No X

If Yes, Is it discharged by:

A. Municipal sewer system after pretreatment? Yes ____ No ____

B. Municipal sewer system without pretreatment? Yes ____ No ____

C. Exempt from pretreatment? Yes ____ No ____

D. Septic system? Yes ____ No ____

E. Drywell not part of septic system? Yes ____ No ____

F. Deep-Well Injection? Yes ____ No ____

G. Lagoon/Pond? Yes ____ No ____

H. Is discharge approved by appropriate agency? Yes ____ No ____

Comments: ____

28. HOW LONG IS HAZARDOUS WASTE STORED ON SITE? Days ____ N/A ____ 9 mos But currently New disposal from 5 yrs

29. HAZARDOUS WASTE STORAGE CONTAINERS

Is hazardous waste stored in :

A. Metal Drums? Yes X No ____

If Yes,

(1) Number 120
(2) Closed? Yes ✓ No ____
(3) Good Condition? Yes ✓ No ____

Comments: ______________________________

B. Non-Metal/Fiber Drums? Yes ____ No ____

If Yes,

(1) Number ________
(2) Closed? Yes ____ No ____
(3) Good Condition? Yes ____ No ____

Comments: ______________________________

C. Containers Less Than 30 Gallons? Yes X No ____

If Yes, Describe: 50 X 5 gal pails closed in good cond

D. Above Ground Storage Tanks? Yes ____ No ____

If Yes, complete:

	Tank 1	Tank 2	Tank 3	Tank 4	Other
Structure					
Age (yrs)					
Contents					
Capacity					
Inv Kept?					

Comments: ______________________________

E. Under Ground Storage Tanks? Yes ____ No ____

If Yes, complete:

	Tank 1	Tank 2	Tank 3	Tank 4	Other
Structure					
Age(yrs)					
Contents					
Capacity					
Inv Kept?					
Testing?					
Date-Last					
Type Test					

Comments: _____

_____

RCRA REQUIRED PRACTICES

30. PERCENTAGE HAZARDOUS WASTE CONTAINERS LABELLED PER RCRA REQUIREMENTS

90 % Remarks Some Labels Not Filled

31. ARE HAZARDOUS WASTE STORAGE CONTAINERS STORED 50 FEET OR MORE INSIDE PROPERTY LINES PER RCRA REQUIREMENTS?

Yes X No ____ Remarks _____

32. ARE AISLES ADEQUATE FOR MOVEMENT OF PERSONNEL AND EMERGENCY EQUIPMENT PER RCRA REQUIREMENTS?

Yes ____ No X Remarks Stacked on Pallets 3 high
NO AISLE SPACE

33. ARE "DANGER" SIGNS POSTED PER RCRA REQUIREMENTS?

Yes ____ No X Remarks _____

34. ARE "NO SMOKING" SIGNS POSTED PER RCRA REQUIREMENTS?

Yes ____ No X Remarks _____

35. IS THERE "FIRE CONTROL" EQUIPMENT AVAILABLE PER RCRA REQUIREMENTS?

Yes _X_ No ____ Remarks _____

36. IS THERE SPILL CONTROL EQUIPMENT AVAILABLE PER RCRA REQUIRMENTS?

Yes _X_ No ____ Remarks _____

37. IS EMERGENCY INTERNAL COMMUNICATIONS/ALARM SYSTEM ADEQUATE PER RCRA REQUIREMENTS?

Yes _X_ No ____ Remarks _____

38. HAZARDOUS WASTE HANDLING PRACTICES AND HISTORY

A. Is there evidence of hazardous waste spill? Yes ____ No ____

If Yes:

(1) From Drums? Yes ____ No ____
(2) From Above Ground Storage Tanks? Yes ____ No ____
(3) From Under Ground Storage Tanks (overfill)? Yes ____ No ____

B. Is there a history of hazardous waste spill? Yes ____ No ____

If Yes:

(1) From Drums? Yes ____ No ____
(2) From Above Ground Storage Tanks? Yes ____ No ____
(3) From Under Ground Storage Tanks (overfill)? Yes ____ No ____

C. Is there evidence of hazardous waste run-off? Yes ____ No ____

If Yes:

(1) From Drums? Yes ____ No ____
(2) From Above Ground Storage Tanks? Yes ____ No ____
(3) From Under Ground Storage Tanks (overfill)? Yes ____ No ____

D. Is there a history of hazardous waste run-off? Yes ____ No ____

If Yes:

(1) From Drums? Yes ____ No ____
(2) From Above Ground Storage Tanks? Yes ____ No ____
(3) From Under Ground Storage Tanks (overfill)? Yes ____ No ____

Comments: _____
_____
_____

39. HAZARDOUS WASTE STORAGE AREA

__X__ Concrete
______ Asphalt
______ Gravel
______ Wood
______ Dirt

40. STORM DRAINS THREATENED? Yes ____ No __X__

Comments: ____

41. IS HAZARDOUS WASTE STORAGE AREA ENTRY CONTROLLED? Yes __X__ No ____

42. ARE HAZARDOUS WASTE STORAGE AREAS ENCLOSED? Yes __X__ No ____

If Yes, Is Emergency Ventilation Available? Yes __X__ No __X__

43. ARE SECONDARY MEANS OF CONTAINMENT PROVIDED? Yes ~~X~~ No __X__

If Yes:

(1) For Drums? Yes ____ No ____
Comments: (structure, capacity): ______________________________

(2) For Above Ground Storage Tanks? Yes ____ No ____
Comments: (structure, capacity): ______________________________

(3) For Under Ground Storage Tanks? Yes ____ No ____
Comments: (structure, capacity): ______________________________

HAZARDOUS WASTE DISPOSAL ACTIVITIES

44. IS HAZARDOUS WASTE HAULED OFF-SITE? / And Receiving Final Last Copy Yes __X__ No ____

Delay Changeover from SCA to Chemwaste Man named new And

If Yes:

A. Name of Hauler: SCA / Adams Chemical Waste Man

Delay from Changing Haulers – Previous Hauler subsequently SCA

B. Is waste properly manifested? Yes __X__ No ____

Lost Shipment 12/84

If No:

C. Recycled through closed-loop system? Yes ____ No ____

D. Discharged to municipal sewer after pretrtmt? Yes ____ No ____

Approved ____ Disapproved ____

E. Discharged to municipal sewer w/o pretrtmt? Yes ____ No ____
Approved ____ Disapproved ____

F. Exempt from pretreatment? Yes ____ No ____

G. Discharged to septic system after pretrtmt? Yes ____ No ____
Approved ____ Disapproved ____

H. Discharge to septic system w/o pretrtmt? Yes ____ No ____
Approved ____ Disapproved ____

I. Discharge to drywell not part of septic system after pretreatment? Yes ____ No ____
Approved ____ Disapproved ____

J. Discharge to drywell not part of septic system without pretreatment? Yes ____ No ____
Approved ____ Disapproved ____

K. Discharged to pit, pond, lagoon? Yes ____ No ____
Approved ____ Disapproved ____

L. Landfilled on-site? Yes ____ No ____
Approved ____ Disapproved ____

Comments: _____
_____
_____

RCRA REPORTING REQUIRMENTS

45. DOES THIS FACILITY HAVE A RCRA CONTINGENY/EMERGENCY PLAN?

Yes ____ No ____ If Yes:

A. Is the plan filed with local emergency response facilities?

Yes ____ No ____

46. ARE RCRA PERSONNEL TRAINING RECORDS ON FILE?

Yes ____ No ____ If Yes:

A. Are there job descriptions for personnel dealing with hazardous wastes included?

Yes ____ No ____

47. ARE INSPECTION LOGS KEPT FOR DAILY INSPECTIONS OF AREAS SUBJECT TO SPILLS?

Yes ____ No X

48. ARE INSPECTION LOGS KEPT FOR WEEKLY INSPECTIONS OF HAZARDOUS WASTE CONTAINERS?

Yes ____ No X

49. DOES INSPECTION SCHEDULE IDENTIFY THE TYPES OF PROBLEMS TO BE LOOKED FOR DURING AN INSPECTION?

Yes ____ No X

50. HAS A FACILITY CLOSURE PLAN BEEN DEVELOPED?

Yes ____ No X If Yes, where filed? _____

Notes: _____

MISCELLANEOUS

51. ARE THERE ANY OTHER HAZARDOUS MATERIAL OR HAZARDOUS WASTE FACILITIES ON THIS PROPERTY?

Yes ____ No X

Comments: _____

52. MONITORING GROUNDWATER QUALITY? Yes X No ____

Comments: V for Drinking Water Standards

53. PROPERTY HISTORY

A. Date property occupied by current owner: 1978

B. Name of previous owner if known: VACANT

C. What was facility previously used for? VACANT

D. Any knowledge of abandoned drums, storage tanks, dumps, etc. on property? NONE / AST / empty / [illegible]

54. ASSESSMENT

A. Does this facility require follow-up contact by ECHD personnel?

Yes X No ____ Comments: RCRA violations

B. Was this facility cooperative during survey?

Yes X No ____ Comments: ____

C. Is there an environmental coordinator or person assigned by management who is responsible for environmental activities?

Yes X No ____ Comments: Director of Operations

55. ADDITIONAL COMMENTS, NOTES, REFERENCES:

Check on SLA to Chem Waste Anal / State OK

Check on Stacking Requirement

Check on exemption on Aisle Space since solid

Previous Transporter
Hall's Specialties
IND 094579547

Dec 84 33,000 lbs Solvent Based Caulk D001

Aug 84 48,000 lbs Non Haz waste

ELKHART COUNTY HEALTH DEPARTMENT
Investigation Report Form

Nature of Investigation: Chemical spill at Geocel Corporation

Name/Address: Geocel Corporation, 53280 Marina Drive, Elkhart, IN

Date: 8-18-83/4:30 p.m. Environmentalist: JLB

Findings: Spoke with Larry Stickel - Operation Officer. Spill of approximately 50 gallons of a nonhazardous plasticizer, Di (C_7-C_9-C_{11}) alkyl Phthalate Ester. Spill occurred when an inside storage tank overflowed causing the material to exit through a vent pipe on the roof. The material was contained to asphalt parking lot and inside plant. "Oil Dry" absorbent was spread over spill area and placed in 55 gallon drums. A small amount of plasticizer drained off parking lot onto lawn. The material inside the plant did not enter any floor drains. No streams or waterways in immediate area.

Jeff Blankenberger
Environmentalist

cc: Bruce Frost, Indiana State Board of Health
Water Pollution Control Division

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

VIA CERTIFIED MAIL 7002 0510 0004 0410 9292 September 1, 2005

Mr. Kerman Peterson
Geocel Corporation/Elkhart
53280 Marina Dr.
Elkhart, Indiana 46514

Re: Violation Letter
Geocel Corporation/Elkhart
IND 069 763 639
Elkhart, Elkhart County

Dear Mr. Peterson:

On 6/23/05, a representative of the Indiana Department of Environmental Management, Office of Land Quality, conducted an inspection of Geocel Corporation, located at 53280 Marina Dr., Elkhart, Indiana. This inspection was conducted pursuant to IC 13-14-2-2. For your information, and in accordance with IC 13-14-5, a summary of the inspection is provided below:

Type of Inspection:
_X_ Compliance Evaluation Inspection (Industrial Waste)
___ Complaint
_X__ Other _Multimedai Screening Checklist

Results of Inspection:
_X__ Violations were observed but corrected during the inspection and a submittal was received July 28, 2005. See inspection report.
____ Violations were observed. See inspection report.

Noncompliance with any of the violations noted in the inspection report at the time of the next inspection may result in a referral to IDEM's Office of Enforcement. Please direct any questions to Theresa Pichtel at (317) 308-3050. Thank you for your attention to this matter.

Sincerely,
Rosemary Cantwell
Rosemary Cantwell
Section Chief
Industrial Waste Compliance Section
Compliance and Response Branch

Enclosure
cc: Elkhart County Health Department

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Governor

Lori F. Kaplan
Commissioner

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Indianapolis, Indiana 46206-6015
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(800) 451-6027
www.in.gov/idem

September 1, 2004

TO: Interested Parties / Applicant

RE: Geocel Corporation / 039-19208-00605

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03

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(800) 451-6027
ww.IN.gov/idem

April 13, 2005

Mr. Kerman Peterson
Geocel Corporation
53280 Marina Drive
Elkhart, IN 46515-0398

Dear Sir or Madam:

Re: Notice of Termination/Exemption
Geocel Corporation, Elkhart, IN
Permit # INR23X128

This letter is in response to your letter requesting concurrence with your interpretation of the applicability of the federal and state storm water regulations to your facility.

According to your letter, your facility does not meet the regulatory criteria which would require you to submit a NPDES storm water permit application (or continue coverage) for the following reason(s):

(2) The facility meets the applicability requirements in 327 IAC 15-6-2 and has filed a Conditional No Exposure Exclusion Certification with the Indiana Department of Environmental Management pursuant to 327 IAC 15-6-12.

If the above statement(s) is/are true, it is not necessary that an application for a storm water permit be submitted at this time. In accordance with state and federal regulations, only those facilities described in 327 IAC 15-6-2 that have discharges of storm water associated with industrial activity that enter municipal separate storm sewer systems or result in point source discharges to waters of the state, which includes ground water, are required to submit applications for storm water discharge permits. Facilities with existing NPDES permits that cover outfalls that receive storm water associated with industrial activity shall maintain their existing permits. Forms 1 and 2F must be submitted at least 180 days prior to the expiration date of the NPDES permit.

Please note that the definition of "point source" is very broad. According to 327 IAC 5-1-2(33), "point source" means "any discernable, confined, and discrete conveyance, including, but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel, or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture, or agricultural storm runoff. See 327 IAC 5-2-4(a)(4) for exclusions."

Elkhart 2.

STATE of INDIANA

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

INDIANAPOLIS, 46225

105 South Meridian Street

RECEIVED
NOV 20 1986
Elk. Co. Health Dept.

NOV 19 1986

VIA CERTIFIED MAIL

Mr. Larry D. Stickel, Vice President Operations
Geocel Corporation
P.O. Box 398
53280 Marina Drive
Elkhart, IN 46515

Re: Hazardous Waste Management
Generator Inspection
Geocel Corporation
IND069763639
Letter of Warning (L-145)

Dear Mr. Stickel:

Representatives of the Department of Environmental Management are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of hazardous waste. Facilities are being inspected to determine compliance with the Environmental Management Act and 320 IAC 4.1, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements." These inspections and record reviews are also being conducted pursuant to the requirements of the Resource Conservation and Recovery Act (RCRA), Public Law 94-580, as amended, for authorized state hazardous waste management programs.

This letter is to inform you that on July 25, 1986, an inspection of Geocel Corporation, located at 53280 Marina Drive, Elkhart, Indiana, was conducted by Mr. Jeff Blankenberger of the Office of Solid and Hazardous Waste Management, Department of Environmental Management. You represented your firm at this inspection.

The following concerns pertaining to the operation of your facility were noted:

1.	320 IAC 4.1-9-5	Personnel have not participated in an annual review of initial training. The inspector noted that an annual review of personnel training had not been given for 1983 or 1984.
2.	320 IAC 4.1-9-5	Personnel training records do not include job descriptions.
3.	320 IAC 4.1-9-5	Personnel training records do not include a description of personnel training.

125

4.	320 IAC 4.1-9-5	The contingency plan does not describe arrangements agreed to by local police departments, fire departments, hospitals, contractors, and state and local emergency response teams.
5.	320 IAC 4.1-9-5	The contingency plan does not include a list of all emergency equipment, location of equipment, physical description of each item on the list, and a brief outline of equipment capabilities. The inspector noted that the list does not include safety boots, gloves, or respirators.
6.	320 IAC 4.1-9-5	The contingency plan does not list, the home addresses of all persons who may assume responsibility as emergency coordinators.

Geocel Corporation, within thirty (30) calendar days of receipt of this letter, shall achieve compliance with the following requirements:

1. Personnel shall participate in an annual review of initial training.

2. Revise personnel training records to include job descriptions. Please be advised that the job descriptions must include the requisite skill, education, or other qualifications of facility personnel assigned to each hazardous waste management duty at the facility. See 320 IAC 4.1-16-7(d)(2). Submit a copy of the job descriptions to this office.

3. Revise personnel training records to include a description of personnel training. See 320 IAC 4.1-16-7(d)(3). Submit a copy of the personnel description to this office.

4. Attempt to make arrangements with local police departments, fire departments, hospitals, and State and local emergency response teams. See 320 IAC 4.1-17-7. These arrangements must be documented in the facility's contingency plan. See 320 IAC 4.1-18-3(c).

5. Revise your contingency plan emergency equipment section to include safety boots, gloves, and respirators.

6. Revise your contingency plan emergency coordinator section to include the home addresses of emergency coordinators. Submit a copy of your contingency plan to this office.

Within thirty-five (35) days of receipt of this letter, submit to this office a letter stating the actions your company has taken to achieve compliance.

Failure to respond adequately to this Letter of Warning will result in a Notice of Violation being issued.

Please direct your response to this letter and any questions to Mr. Rod Steele of the Office of Solid and Hazardous Waste Management, Department of Environmental Management, AC 317/232-3405.

Very truly yours,

Thomas Russell

Thomas Russell, Chief
Enforcement Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

RJS/slh
cc: Elkhart County Health Department
Ms. Sally K. Swanson, U.S. EPA, Region V
Mr. Jeff Blankenberger

STATE of INDIANA

DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015

Mr. Larry D. Stickel
Vice President, Operations
Geocel Corporation
P.O. Box 398
53280 Marina Drive
Elkhart, IN 46515

Re: Letter of Compliance, Case No. L-145
Geocel Corporation
EPA I.D. No. IND 069763639
Elkhart, Indiana

Dear Mr. Stickel:

Based upon documents available to the Office of Solid and Hazardous Waste Management staff during a record review on February 20, 1987, it has been determined that Geocel Corporation has achieved compliance with the terms of the Letter of Warning issued to your firm on November 19, 1986.

Thank you for your cooperation. If you have any questions concerning this matter, feel free to contact Mr. Rod Steele of the Office of Solid and Hazardous Waste Management at AC 317/232-3405.

Very truly yours,

Thomas L. Russell

Thomas L. Russell, Chief
Enforcement Section
Hazardous Waste Management Branch
Solid and Hazardous Waste Management

RJS/tjd
cc: Elkhart County Health Department
Ms. Sally Swanson, U.S. EPA, Region V
Mr. Jeff Blankenberger

66-01

STATE OF INDIANA

INDIANAPOLIS

STATE BOARD OF HEALTH
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:
Indiana State Board of Health
1330 West Michigan Street
P. O. Box 1964
Indianapolis, IN 46206-1964

FEB 08 1983

FEB 10 198

Mr. Larry D. Steckel
Geocel Corporation
53280 Marina Drive
Elkhart, IN 46513

Dear Mr. Steckel:

Re: RCRA Compliance Inspection
Geocel Corporation
IND 069763639

This letter will acknowledge receipt of information from Geocel Corporation on December 20, 1982. This information was submitted in response to our letter of October 19, 1982, citing violations of the Federal Resource Conservation and Recovery Act (RCRA) and Environmental Management Board (EMB) Rule 320 IAC 4.

Based on the information submitted, our staff has determined that all requirements for compliance with RCRA and Rule 320 IAC 4 have been met. A reinspection may be made at a later date for an on-site evaluation. Your cooperation and efforts in this matter are appreciated.

If you have any questions, please call Mr. James J. Mattes at the Indiana State Board of Health, 317/633-0836.

Very truly yours,

James M. Hunt, Chief
Generator/Transporter Section
Hazardous Waste Management Branch
Division of Land Pollution Control

JJM/tw
cc: Elkhart County Health Department

LISTED BELOW ARE A FEW OF THE REQUIREMENTS
OF A HAZARDOUS WASTE GENERATOR

A. Per 40CFR 262.34 and 320IAC 4-4-1 hazardous waste is not to be stored on-site longer than 90 days unless a facility is so designated as a storage facility.

B. As a Generator of hazardous waste you are required under 40CFR 262.34 and 320IAC 4-4-1 to clearly mark the START of the accumulation period of each hazardous waste container.

C. As a Generator of hazardous waste you are required under 40CFR 262.34 and 320IAC 4-4-1 to clearly label each container as containing hazardous waste. Labels may be obtained from several vendors.

D. As a Generator of hazardous waste you are required under 40CFR 262.34 and 320IAC 4-4-1 to inspect hazardous waste containers on a weekly basis. It is recommended that such inspections begin immediately and that an inspection log be kept documenting these inspections.

E. According to 40CFR 262.20 "a Generator who transports or offers for transportation hazardous waste for off-site treatment, storage or disposal must prepare a manifest before transporting the waste off-site".

F. According to 40CFR 262.42 (a) "a Generator who does not receive a copy of the manifest with the handwritten signature of the owner or operator of the designated facility within 35 days of the date the waste was accepted by the initial transporter must contact the transporter and/or the owner or operator of the designated facility to determine the status of the hazardous waste".

This rule goes on to state you must further contact the EPA (Chicago Region V 1-800-621-8431) to report such a fact if the manifest copy is not returned within 45 days.

G. According to 40CFR 262.33 and 320IAC 4-4-1 "before transporting hazardous waste or offering hazardous waste for transportation off-site, a Generator must placard or offer the initial transporter the appropriate placards according to Department of Transportation regulations for hazardous materials under 49CFR Part 172, Subpart F".

H. Per 40CFR 262.34 (4) "Generators (must) comply with the requirements for owners or operators in Subpart C and D of 40CFR Part 265 and with 265.16". This section, in part, refers to the need for "internal communication systems, alarm systems, telephone, or two-way radio, fire control, spill control and decontamination equipment".

I. Per 40CFR 262.34 (4) Generators must also provide adequate aisle space in waste drum storage areas. Generally this is interpreted as meaning drums may be stacked only 2 high and 2 by side with an equal separation distance between rows.

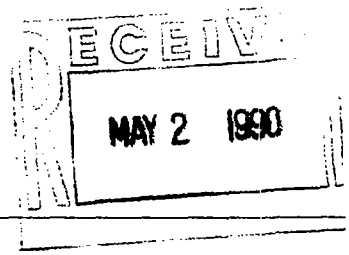
J. As a Generator of hazardous waste you are required under 40CFR 262.34 (265.16) and 320IAC 4-4-1 to train facility personnel in hazardous waste management procedures. You are also required to keep personnel training records at your facility. Include Job Descriptions

It is recommended that an appropriate Personnel Training Program be completed by your firm as soon as possible. One such program is offered through Purdue University and enclosed you will find a pamphlet prepared by Purdue describing their

Elkhart County Health Department

Elkhart County Ground Water Protection Ordinance
REGISTRATION FORM

(see back for directions)



SECTION I — **GENERAL INFORMATION**

A. NAME OF BUSINESS Girl Camp

ADDRESS 53250 Morris Rd

CITY Elkhart ZIP CODE 46514

TOWNSHIP Osolo

B. CONTACT PERSON ~~Larry Stickel~~ Bill Grosshorn PHONE 264-0645

ALTERNATE PHONE 536-1258

C. Are you RCRA inspected? YES ✓ NO _____ if YES when was the last inspection _____

D. Has CERCLA information been provided to Elkhart County? YES ✓ NO _____

SECTION II — **ON-SITE WASTEWATER DISPOSAL REGISTRATION**

A. Type	B. Purpose	C. Location	D. Estimated Flow
Septic	Sewage	50' West, 70' South	approx. 40
	NO process waste	of NE Corner of Bldg	people

SECTION III — **STORAGE OF TOXIC OR HAZARDOUS SUBSTANCES**
(not required if registered under CERCLA)

A. Substance	B. Class	C. Maximum Amount	D. Location	E. Type of Container

TO BE RETURNED TO ELKHART COUNTY HEALTH DEPARTMENT PRIOR TO MAY 1, 1990

Address: 315 So. Second Street
Elkhart, IN 46516
Phone: (219) 523-2272

Elkhart Co HD

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

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Governor

John M. Hamilton
Commissioner

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Indianapolis, Indiana 46206-6015
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www.ai.org/idem

VIA CERTIFIED MAIL P 125 733 900 March 27, 1998

Mr. William Grashorn, Director of Operations
Geocel Corporation
53280 Marina Drive
Elkhart, IN 46515

Dear Mr. Grashorn:

Re: Inspection Results
Hazardous Waste Management
Compliance Evaluation
Geocel Corporation
EPA I.D. No. IND 069 763 639
Elkhart, Elkhart County

Representatives of the Department of Environmental Management (Department) are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of hazardous waste. Facilities are being inspected to determine compliance with Indiana Code 13 (IC 13), "Environmental Management Act", and Indiana Administrative Code, 329 IAC 3.1, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements". This article incorporates federal standards for the management of hazardous waste, which have been published in 40 CFR 260 through 40 CFR 270, as of July 1, 1995. These inspections and record reviews are also being conducted pursuant to the requirements of the Resource Conservation and Recovery Act (RCRA), Public Law 94-580, as amended, for authorized state hazardous waste management programs.

This is to inform you that on February 13, 1998, I conducted an inspection of Geocel, located at 53280 Marina Drive. You represented your firm. For your information, a summary of the inspection report is provided below:

Type of Inspection:
- _x_ Complete RCRA Hazardous Waste Inspection
- __ Limited RCRA Hazardous Waste Inspection
- __ Complaint
- __ Other:_____

i 32

Results of Inspection:
__ Additional information is required to evaluate overall compliance. You will receive a completed report within 30 days.
__ In compliance, no violations observed.
__ In compliance, violations were observed but were corrected during the inspection. See inspection report.
x Violations were observed and require a follow-up inspection. See inspection report. Re-inspection will be conducted after _____.
__ Violations were observed and require a submittal. See inspection report. Submittal is due 30 days after receipt.
__ Violations were observed and are being referred to our Office of Enforcement. See inspection report.

Please direct any response to this letter and any questions to me at 317-233-2800.

Sincerely,

Kirk Maravolo
Environmental Manager
Hazardous Waste Compliance Branch
Solid and Hazardous Waste Management

kbm
Enclosure
cc: Elkhart Co. Health Department

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Evan Bayh
Governor
Kathy Prosser
Commissioner

105 South Meridian Street
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-60

Office of Solid and Hazardous Waste Management
Special Waste Disposal Approval
Certification No. 30749

The following State Permitted Sanitary Landfill

Elkhart County Landfill, OPP No. 20-4
59530 County Road 7 South
Elkhart, IN 46517

is authorized by the Indiana Department of Environmental Management, Office of Solid and Hazardous Waste Management, to dispose of:

caulking and sealant from line flush

from the following generator:

Geocel Corporation
53280 Marwa Dr.
Elkhart, IN 46514

This approval shall expire on July 31, 1995.
Conditions that apply to this approval are indicated on the reverse side.

Jerry Rud (for Patrick Carroll) 7/21/93

Patrick Carroll, Chief
Solid Waste Permit Branch
Solid and Hazardous Waste Management

Date

General Conditions That Apply To All Special Waste Approvals:

1. The generator and/or hauler shall provide the landfill with advanced notification of intended disposal.
2. If nuisance or pollution conditions are created, immediate corrective action shall be taken by the operator.
3. Waste material(s) accepted under this approval shall be included on the Special Waste Monthly Report to be submitted to this office monthly.
4. This approval may be revoked if the landfill enters corrective action under 329 IAC 2-16-9 or fails to maintain compliance with 329 IAC 2.
5. Any change in the raw materials, the process(es) generating the waste, or the characteristics of the waste stream(s) shall be reported in writing to the IDEM and the disposal site prior to further disposal. If it is determined that the change is substantial, this certification shall be void.
6. The waste(s) shall not contain free liquids.
7. The waste(s) shall not present a fire or explosion hazard.

Special Conditions That Are Required For Disposal of The Waste(s) Will Be Indicated By The Reviewer's Initials:

____ 1. At least one end of the container shall be completely opened so that the waste(s) may be readily identified.

____ 2. Specific conditions concerning asbestos are attached.

~~AGH~~ 3. A new TCLP for organics, flash point, and a paint filter test of each waste shall be provided to IDEM at the time of renewal of this approval.

Anticipated Disposal Quantity: Approximately 100 cubic yards annually.

AGH 7/19/93
Reviewer/Date

DCL 7/20/93
Senior E.M./Date

Jerry Rud 7/21/93
Sec. Chief/Date

cc: Elkhart County Health Department
Elkhart County Solid Waste Management District
Mr. Bill Grasshorn, Geocel Corp., P.O. Box 398, Elkhart, IN 46515

Elkhart Co HD

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Frank O'Bannon
Governor

John M. Hamilton
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.ai.org/idem

VIA CERTIFIED MAIL Z 441 078 698

June 30, 1998

Mr. William Grashorn, Director of Operations
Geocel Corporation
53280 Marina Drive
Elkhart, Indiana 46515

Dear Mr. Grashorn:

Re: Inspection Results
Hazardous Waste Management
Enforcement Follow-up Inspection
Geocel Corporation
EPA I.D. No. IND 069 763 639
Elkhart, Elkhart County

Representatives of the Department of Environmental Management (Department) are conducting inspections of facilities in Indiana that are engaged in the generation, transportation, treatment, storage, or disposal of hazardous waste. Facilities are being inspected to determine compliance with Indiana Code 13 (IC 13), "Environmental Management Act;" and Indiana Administrative Code, 329 IAC 3.1, "Hazardous Waste Management Permit Program and Related Hazardous Waste Management Requirements." This article incorporates federal standards for the management of hazardous waste, which have been published in 40 CFR 260 through 40 CFR 270, as of July 1, 1995. These inspections and record reviews are also being conducted pursuant to the requirements of the Resource Conservation and Recovery Act (RCRA), Public Law 94-580, as amended, for authorized state hazardous waste management programs.

This is to inform you that on June 17, 1998, I conducted an inspection of Geocel Corporation, located at 53280 Marina Drive, Elkhart. You represented your firm. For your information, a summary of the inspection report is provided below:

Type of Inspection:

___	Complete RCRA Hazardous Waste Inspection
✓	Limited RCRA Hazardous Waste Inspection
___	Complaint
✓	Other: Enforcement Follow-Up Inspection

36

Results of Inspection:

__ Additional information is required to evaluate overall compliance. You will receive a completed report within 30 days.

__ In compliance, no violations observed.

✓ In compliance, violations were observed but were corrected during the inspection. See inspection report.

__ Violations were observed and require a follow-up inspection. See inspection report. Re-inspection will be conducted after _____.

__ Violations were observed and require a submittal. See inspection report. Submittal is due _____.

__ Violations were observed and are being referred to our Office of Enforcement. See inspection report.

Please direct any response to this letter and any questions to me at 317/233-1522.

Sincerely,

Mary E. Shelton
Environmental Manager
Compliance Section
Hazardous Waste Compliance Branch
Solid and Hazardous Waste Management

MES
Enclosure
cc: Elkhart County Health Department

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September 1, 2004

TO: Interested Parties / Applicant

RE: Geocel Corporation / 039-19208-00605

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 9/16/03

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

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Indianapolis, Indiana 46206-6015
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September 1, 2004

Mr. Kerman Peterson
Geocel Corporation
53280 Marina Drive
P.O. Box 398
Elkhart, IN 46515

Re: Exempt Operation Status,
039-19208-00605

Dear Mr. Peterson:

The application from Geocel Corporation, received on May 20, 2004, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following caulks and sealants compounding source, located at 53280 Marina Drive, Elkhart, Indiana, is classified as exempt from air pollution permit requirements:

(a) Two (2) above ground, fixed-roof storage tanks, constructed between 1975 and 1982, storing Aromatic 100 Fluid, capacity: 5,000 gallons, each.

(b) One (1) above ground, fixed-roof storage tank, constructed between 1975 and 1982, storing Perc, capacity: 4,000 gallons.

(c) One (1) above ground, fixed-roof storage tank, constructed between 1975 and 1982, storing a plasticizer, capacity: 4,000 gallons.

(d) Three (3) solvent compounding mixing tanks, constructed between 1975 and 1982, each equipped with vacuum lines and a condenser, and all equipped with a one (1) common final condenser, two (2) with a capacity of 1,000 gallons and one (1) with a capacity of 500 gallons.

(e) One (1) small open mixer for the pigmenting process, constructed between 1975 and 1982, for water-based products only, processing no VOCs or HAPs, capacity: 2,000 pounds of product per batch and 3 batches per day.

(f) One (1) large open mixer for the pigmenting process, constructed between 1975 and 1982, for solvent-based products, capacity: 1,635 pounds per batch and two (2) batches per hour.

(g) Twelve (12) small, portable product holding tanks, constructed between 1975 and 1982, capacity: 200 gallons, each.

(h) Eight (8) large, portable product holding tanks, constructed between 1975 and 1982, with capacities ranging from 1,000 to 1,500 gallons, each.

(i) One (1) latex compounding operation, using no solvent based products, constructed between 1975 and 1982, capacity: 15,000 pounds per batch and two (2) batches per day.

(j) One (1) maintenance parts washing unit, constructed around 1994, using only non-halogenated solvents, maximum solvent usage: 25 gallons per month.

The following conditions shall be applicable:

(1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) *Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15* minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

(2) Pursuant to326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(a) Equip the cleaner with a cover;

(b) Equip the cleaner with a facility for draining cleaned parts;

(c) Close the degreaser cover whenever parts are not being handled in the cleaner;

(d) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(e) Provide a permanent, conspicuous label summarizing the operation requirements;

(f) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

(3) The condensors on the three (3) solvent compounding mixing tanks shall operate at all times when the solvent compounding mixing tanks are in operation in order to be considered integral to the process. Any change or modification which causes the condensors to not operate at all times when the solvent mixing tanks are in operation may cause the source to require a Registration under 326 IAC 2-5.5-1, and shall require prior IDEM, OAQ, approval.

This exemption supercedes the Registration issued on August 3, 1982.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

CAP/MES

cc: File - Elkhart County
Elkhart County Health Department
Air Compliance - Paul Karkiewicz
Northern Regional Office
Permit Tracking
Compliance Data Section

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	**Geocel Corporation**
Source Location:	**53280 Marina Drive, Elkhart, IN 46515**
County:	**Elkhart**
SIC Code:	**2891**
Exemption No.:	**039-19208-00605**
Permit Reviewer:	**CarrieAnn Paukowits**

The Office of Air Quality (OAQ) has reviewed an application from Geocel Corporation relating to the operation of a caulks and sealants compounding source.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Two (2) above ground, fixed-roof storage tanks, constructed between 1975 and 1982, storing Aromatic 100 Fluid, capacity: 5,000 gallons, each.

(b) One (1) above ground, fixed-roof storage tank, constructed between 1975 and 1982, storing Perc, capacity: 4,000 gallons.

(c) One (1) above ground, fixed-roof storage tank, constructed between 1975 and 1982, storing a plasticizer, capacity: 4,000 gallons.

(d) Three (3) solvent compounding mixing tanks, constructed between 1975 and 1982, each equipped with vacuum lines and a condenser, and all equipped with a one (1) common final condenser, two (2) with a capacity of 1,000 gallons and one (1) with a capacity of 500 gallons.

(e) One (1) small open mixer for the pigmenting process, constructed between 1975 and 1982, for water-based products only, processing no VOCs or HAPs, capacity: 2,000 pounds of product per batch and 3 batches per day.

(f) One (1) large open mixer for the pigmenting process, constructed between 1975 and 1982, for solvent-based products, capacity: 1,635 pounds per batch and two (2) batches per hour.

(g) Twelve (12) small, portable product holding tanks, constructed between 1975 and 1982, capacity: 200 gallons, each.

(h) Eight (8) large, portable product holding tanks, constructed between 1975 and 1982, with capacities ranging from 1,000 to 1,500 gallons, each.

(i) One (1) latex compounding operation, using no solvent based products, constructed between 1975 and 1982, capacity: 15,000 pounds per batch and two (2) batches per day.

(j) One (1) maintenance parts washing unit, constructed around 1994, using only non-halogenated solvents, maximum solvent usage: 25 gallons per month.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted emission units operating at this source during this review process.

Existing Approvals

This is a transition from Registered Operation status to Exempt status. The source has been operating under previous approvals including, but not limited to, the following:

Registered Operation Status, no number, issued on August 3, 1982

All conditions from previous approvals were incorporated into this permit except the following:

"Emissions shall be at a level acceptable to 325 IAC 6-3." That rule is now 326 IAC 6-3.

Reason not incorporated:

The facilities at this source are exempt from the requirements of 326 IAC 6-3 as explained in the State Rule Applicability - Individual Facilities section of this document.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justification such that the condensors on each of the three (3) solvent compounding mixing tanks be considered as an integral part of the solvent mixing process:

(a) The condensors are used to capture and return the solvent to the product tanks.

(b) The vacuum is required to remove trapped air from the product prior to shipping. The solvent capture and return on the vacuum lines is necessary for product quality control to maintain the correct compositon of the products. Without the condensors, the vacuum lines would become plugged with solvent and would need to be shut down.

IDEM, OAQ has evaluated the justifications and agreed that the condensors will be considered as an integral part of the solvent compounding process. Therefore, the permitting level will be determined using the potential to emit after the condensors. The Exemption Letter requires that these condensors operate at all times when the solvent compounding mixing tanks are in operation.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on May 20, 2004, with additional information received on July 14 and August 2, 2004.

Emission Calculations

See Appendix A of this document for detailed emission calculations.

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, includling air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	0.701
PM_{10}	0.701
SO_2	0.00
VOC	6.98
CO	0.00
NO_x	0.00

HAPs	Potential to Emit (tons/yr)
Perchloro-ethylene	8.16
Xylenes	0.020
Cumene	0.010
Total	8.19

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM, PM_{10}, and VOC are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
1-HourOzone	Maintenance attainment
8-Hour Ozone	Basic nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and nitrogen oxides (NO_X) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_X emissions were reviewed pursuant to the requirements for nonattainment new source review.

(b) Elkhart County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD, Part 70, or FESOP Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	0.701
PM_{10}	0.701
SO_2	0.00
VOC	6.98
CO	0.00
NO_x	0.00
Single HAP	8.16
Combination HAPs	8.19

(a) This existing source is **not** a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28

listed source categories, and no nonattainment regulated pollutant is emitted at a rate of 100 tons per year or greater.

(b) These emissions are the unrestricted potential emissions from this source.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) criteria pollutant is less than 100 tons per year,

(b) single hazardous air pollutant (HAP) is less than 10 tons per year, and

(c) any combination of HAPs is less than 25 tons per year.

This status is based on all the air approvals issued to the source. This status has been verified by the OAQ inspector assigned to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in the permit for this source.

(b) The parts cleaner at this source does not use halogenated solvents. Therefore, the requirements of 40 CFR 63, Subpart T, are not applicable.

(c) This source is not a major source of HAPs. Therefore, although the source may produce many different products, the requirements of 40 CFR 63, Subpart U and Subpart JJJ, are not applicable.

(d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14 and 20 and 40 CFR Parts 61 and 63) included in the permit for this source.

State Rule Applicability – Entire Source

326 IAC 2-6 (Emission Reporting)

This source is not located in Lake or Porter County with the potential to emit greater than twenty-five (25) tons per year of NO_x, does not emit five (5) tons per year or more of lead and does not require a Part 70 Operating Permit. Therefore, the requirements of 326 IAC 2-6 do not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this caulks and sealants manufacturing source will emit less than ten (10) tons per year of a single HAP and twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The potential particulate emissions from each facility at this source are less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(b)(14), the requirements of 326 IAC 6-3 are not applicable.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The potential VOC emissions from each facility at this source are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-3 (Organic Solvent Degreasing Operations)

(a) The cold cleaner at this source has a remote solvent reservoir. Therefore, the requirements of 326 IAC 8-3-5 are not applicable.

(b) The cold cleaner at this source was constructed after 1980. Therefore, the requirements of 326 IAC 8-3-2 are applicable. Pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), for cold cleaning operations constructed after January 1, 1980, the Permittee shall:

(1) Equip the cleaner with a cover;

(2) Equip the cleaner with a facility for draining cleaned parts;

(3) Close the degreaser cover whenever parts are not being handled in the cleaner;

(4) Drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

(5) Provide a permanent, conspicuous label summarizing the operation requirements;

(6) Store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a manner that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

Conclusion

The operation of this caulks and sealants manufacturing source shall be subject to the conditions of the **Exemption 039-19208-00605.**

Appendix A: Emission Calculations

Company Name: Geocel Corporation
Plant Location: 53280 Marina Drive, Elkhart, IN 46515
County: Elkhart
Approval No.: 039-19208-00605
Application Date: May 20, 2004
Permit Reviewer: CarrieAnn Paukowits

Solvent Compounding Mixing Tanks

Actual Solvent Captured (gallons/year)	Actual Operating Hours (hrs/year)	Maximum Potential Solvent Captured (gallons/yr)	Capture Efficiency of Integral Control (%)	Control Efficiency of Integral Control (%)	Maximum Solvent Density (lbs/gallon)	Potential VOC Emissions (tons/yr)
250	2574	851	100%	50%	10.0	4.25

Methodology
Potential VOC Emissions (tons/yr) = Actual Solvent Captured (gal/yr) x (8,760 hrs/yr / 2,574 hrs/yr) x Maximum Solvent Density (lbs/gal) x 1 ton/2,000 lbs
Since the control efficiency is 50%, an equal amount is captured and emitted.

Pigmenting Process

Blend Weight (lbs)	Product Weight (lbs)	Maximum Potential Emissions (lbs/batch)	Batch Processing Time (hrs)	Maximum Potential Mass Lost (tons/year)	Maximum Weight % Perchloro-ethylene in Mixture	Maximum Weight % SC-100 in Mixture
1635	1635	1	0.5	17.52	46.6%	3.80%

Weight % VOC in SC-100	Weight % 1,2,4 Trimethylbenzene in SC-100	Weight % Xylene in SC-100	Weight % Cumene in SC-100	Potential Perchloro-ethylene Emissions (tons/yr)	Potential VOC Emissions (tons/yr)	Potential Xylene Emissions (tons/yr)	Potential Cumene Emissions (tons/yr)	Potential Total HAP Emissions (tons/yr)
100%	32.0%	3.0%	1.5%	8.16	0.666	0.020	0.010	8.19

Pigment Weight in blend (lbs)	Emission Factor (lb/ton)	Potential PM/PM10 Emissions (tons/yr)	Number of Mixers handling solids	Total Potential PM/PM10 Emissions (tons/yr)
4.0	20	0.350	2	0.701

Methodology

EPA has determined that Perchloroethylene has negligible photochemical reactivity and is not a VOC.
Particulate
Emission factor from AP-42, Chapter 6.4, Table 6.4-1 and FIRE 6.2
Total Potential PM/PM10 Emissions (tons/yr) = Pigment weight in blend (lbs) x 1 ton/2,000 lbs x 2 batches/hr x 8,760 hrs/yr x Emission Factor (lbs/ton) x 1 lb/2,000 tons
VOC/HAP
Maximum potential emissions (lbs/batch) is based on the scale, which is accurate to 0.5 lbs.
The scale did not measure any loss between the batch and the product; Therefore, the maximum amount lost is 1 lb/batch.
Maximum potential emissions (tons/yr) = maximum potential emissions (lbs/batch) x 2 batches/hr x 8,760 hrs/yr x 1 ton/2,000 lbs
Potential Perchloroethylene Emissions (tons/yr) = Maximum Potential Emissions (tons/yr) x Maximum Weight % Perchloroethylene in Mixture
Potential VOC Emissions (tons/yr) = Maximum Potential Emissions (tons/yr) x Maximum Weight % SC-100 in Mixture x Weight % VOC in SC-100
Potential Individual HAP Emissions other than Perchloroethylene (tons/yr) = Maximum Potential Emissions (tons/yr) x Maximum Weight % SC-100 in Mixture x Weight % HAP in SC-100

Degreasing

Material	Maximum Usage Rate (gallons/month)	Solvent Density (lbs/gal)	Weight % VOC	Potential to Emit VOC (tons/yr)
Safety Kleen	25	6.7	100%	1.01

Methodology
Potential to Emit VOC (tons/yr) = Maximum Usage Rate (gallons/month) x Solvent Density (lbs/gal) x Weight % VOC x 12 months/yr x 1 ton/2,000 lbs

Other Operations

	Potential to Emit VOC (tons/yr)
Tanks	0.059
Cleanup	1.00
Total	1.06

Methodology
Tanks emissions provided by the applicant and calculated with TANKS 4.0.
Cleanup emissions conservatively estimated.

Totals

Potential to Emit PM/PM10 (tons/yr)	Potential to Emit VOC (tons/yr)	Potential to Emit Perchloro-ethylene (tons/yr)	Potential to Emit Xylenes (tons/yr)	Potential to Emit Cumene (tons/yr)	Potential to Emit Total HAPs (tons/yr)
0.701	6.98	8.16	0.020	0.010	8.19

147 A

HAZARDOUS WASTE CONTINGENCY PLAN
AND
EMERGENCY PROCEDURES

Prepared for:

Geocel Corporation
53280 Marina Drive
Elkhart, IN 46515
SIC Code: 2891

Prepared by:

Cornerstone Environmental, Health and Safety, Inc.
880 Lennox Court
Zionsville, Indiana
Telephone: (317) 733-2637
Fax: (317) 733-2481

March 2003
Updated February 2004

Client #2068

MANAGEMENT APPROVAL
FEBRUARY 2004 UPDATE

"I certify that this document and all attachments were prepared under my direction or supervision and developed in accordance with the regulations mandated by the Resource Conservation and Recovery Act (RCRA) as found in 40 CFR 262.34 which incorporates 40 CFR 265 subparts C and D on the subjects of Preparedness, Prevention and the Contingency Plan, and 40 CFR 265.16 on the subject of Training. To my knowledge and belief the information contained herein is true, accurate, and complete."

SIGNATURE: 

NAME: Kerwin Peterson

TITLE: Director of Operations

DATE: 2-13-04

ARRANGEMENTS

In accordance with federal regulations, Geocel Corporation is required to make arrangements to familiarize local authorities with the layout of the facility, properties of hazardous waste handled at the facility and associated hazards, and other relevant emergency information. *The following agencies will receive a copy of this Plan upon management approval:*

John Lerner, Chair *Elkhart County Emergency Planning Committee* *4320 Elkhart Road* *Goshen, IN 46526*	*Mailed to agency on: 2/26/04* *Via Certified Mail: 7003 0500 0004 4368 3359*
Elkhart Police Department *Administration Department* *175 Waterfall Drive* *Elkhart, IN 46516*	*Mailed to agency on: 2/26/04* *Via Certified Mail: 7003 0500 0004 4368 3366*
Fire Chief Jerry Miller *Osolo Township Fire Department* *24936 Buddy Street* *Elkhart, IN 46514*	*Mailed to agency on: 2/26/04* *Via Certified Mail: 7003 0500 0004 4368 3373*
Wes Davis, President *Elkhart General Hospital* *600 East Blvd.* *Elkhart, IN 46516*	*Mailed to agency on: 2/26/04* *Via Certified Mail: 7003 0500 0004 4368 3380*
Indiana Emergency Response Commission *100 N. Senate Avenue* *P.O. Box 7024* *Indianapolis, IN 46207-7024*	*Mailed to agency on: 2/26/04* *Via Certified Mail: 7003 0500 0004 4368 3397*

FOREWARD

This Contingency Plan with Emergency Response Procedures has been developed to meet the requirements of industrial facilities that manufacture, import, process, or otherwise use hazardous materials and/or generate hazardous wastes. The Plan is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water.

The Plan has been prepared under the guidelines of the Environmental Protection Agency (EPA) resulting from the regulations mandated by the Resource Conservation and Recovery Act (RCRA). The State of Indiana accepts by reference the federal regulations found under 40 CFR 262.34 that incorporate 40 CFR 265 subparts C and D on the subjects of Preparedness, Prevention and the Contingency Plan, and 40 CFR 265.16 on the subject of Training. The Indiana regulations are found in Indiana Administrative Code (IAC) Title 329, Parts 3.1-10.1. Information in this Plan is organized under three sections; (1) Contingency Planning and Emergency Procedures, (2) Preparedness and Prevention, and (3) Personnel Training.

This document should be used by the facility as a guideline for meeting the Federal and State requirements that pertain to this matter. Throughout this document the terms substance, material, or waste refer to hazardous substances, materials, and wastes, unless otherwise noted.

- *Used fluorescent lamps (Universal Waste)*
  DOT Description: Environmentally Hazardous Substance, Solid (Mercury)
  Generation Process: Replacement of used bulbs
  EPA Waste Code: D009
  Hazards: Minimal hazards if lamps are unbroken and properly stored to reduce breakage. Broken lamps may cause exposure to mercury vapor, which can occur through inhalation, and eye or skin contact. Gloves, long sleeves and goggles should be worn when handling broken lamps. Any broken lamps should be carefully packaged and stored in a secure area, and arrangements for a pickup should be made as quickly as possible. Any glass and powder debris should be collected using stiff paper or dustpan and brush and placed in a sealed container.

1.3 Emergency Coordinators

See Section 10, Appendix A, for list of Emergency Coordinators.

The Emergency Coordinators listed in Appendix A have the responsibility of coordinating emergency response measures at the facility, in the event of a fire, explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility. The personnel listed have been chosen based on their knowledge of the overall operations involving hazardous waste, and have received RCRA Waste Training.

The listed personnel have authority to commit all resources of the Company in the event of a hazardous waste release. They are familiar with procedures to be followed in the event of an emergency, the location and characteristics of hazardous wastes generated at the plant, and the location of hazardous waste records within the facility.

1.4 Emergency Response Numbers

The table below lists organizations that may need to be contacted, depending on the nature of the emergency.

EMERGENCY RESPONSE NUMBERS	
Fire/ Police/ Ambulance	**911**
Elkhart General Hospital	(574) 523-3315
Elkhart County Local Emergency Planning Committee (LEPC)	(574) 875-3391 (574) 533-4151
Elkhart Police Department (non-emergency)	(574) 295-7070
Osolo Township Fire Department (non-emergency)	(574) 264-1066
Indiana State Police – Bremen District (non-emergency)	(574) 233-1123
Indiana Department of Environmental Management 24-hour Spill Reporting Hotline	(888) 233-7745
National Response Center (U.S.C.G.) - 24 hour service	(800) 424-8802
Indiana Poison Center	(800) 222-1222
NIPSCO – Gas Leak Emergencies	(800) 634-3524
American Electric Power – Customer Service	(800) 311-4634

2.0 Implementation of Contingency Plan

The decision to implement the Contingency Plan at Geocel depends upon whether an imminent or actual incident could threaten human health, property, or the environment. The Contingency Plan will be implemented under the conditions listed below if they result in the release of hazardous waste which could threaten human health or the environment.

2.1 Fire and/or Explosion

- The fire causes release of hazardous waste or hazardous waste constituents to air, soil, or surface water at the facility.
- An imminent danger exists that an explosion could result in release of hazardous waste(s).
- An explosion has occurred, causing the release of hazardous waste(s).

2.2 Spill or Material Release

- The spill could cause or has caused the release of hazardous waste or hazardous waste constituents to air, soil or surface water at the facility.
- The spill could result, or has resulted in release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.
- The spill cannot be contained on site, resulting in off-site soil, surface water or ground water contamination.

2.3 Natural Disaster

- There is impending danger of tornadoes or high winds.
- The potential exists for localized flooding due to large rainfall amounts.

2.4 Other

- Bomb or personnel threat.

3.0 Emergency Procedures

3.1 General

This Section deals with emergencies that may involve the release of hazardous waste.

Upon the discovery of a fire, explosion or spill, or a situation that may result in a fire, explosion or spill, the employee discovering the situation shall notify an Emergency Coordinator, who will determine if the Evacuation Plan must be implemented. In the event of a fire, the facility fire alarm will sound, indicating that all employees must evacuate. Any other emergency messages will be communicated via the PA system or direct communication.

No Geocel employees are authorized to perform hazardous waste cleanup, unless they have received at least twenty-four hours of training at the level of Hazardous Materials Technician. (Employees who have received eight hours of training at the First Responder Operations level may attempt to contain the release from a safe distance to keep it from spreading, but may not perform clean up).

In the event of a hazardous waste release which does not involve a fire or explosion, the Emergency Coordinator will call a spill response agency, or call 911 for outside assistance, unless the release is small enough to be easily contained (approximately five gallons or less). Phones are located throughout the plant that can access outside lines. A list of emergency phone numbers is located by key phone(s).

Personnel trained in the use of fire extinguishers may respond to small fires, using portable fire extinguishers. If outside assistance is needed, or if an explosion should occur, the Emergency Coordinator for that shift will contact the Osolo Township Fire Department.

3.2 Fire and/or Explosion Involving Hazardous Waste

The following areas involve potential hazardous waste generation or storage, and have the potential for fire and/or explosion to occur:

- *Tanks in Solvent Compounding Area*
- *Parts washer in Maintenance Department*
- *Distressed Inventory Storage Area*
- *Material to be Disposed Area*

Procedures :

1. If a fire or explosion should occur, all employees must evacuate the building. Evacuation procedures are listed in Section 4.0.
2. If the fire has resulted in the release of hazardous waste or hazardous waste constituents, the procedures in Section 3.3 will be implemented, if time allows and it is safe to do so.
3. If the Emergency Coordinator determines that the fire or explosion could threaten human health or the environment outside the facility, he must immediately notify the Elkhart County LEPC and the National Response Center (phone numbers listed in Section 1.4).
4. The Emergency Coordinator must monitor for leaks, pressure buildup, gas generation or ruptures in valves, pipes, or other equipment, wherever this is appropriate. This should be done with the assistance of the local fire department.

3.3 Spill or Material Release of Hazardous Waste

Spills of hazardous waste may occur at the point of generation or storage, during transport inside the building(s), or during pick-up by the hazardous waste contractor. Spills of hazardous waste may occur in the following areas:

- *Spills from mixing or storage tanks*
- *Spill from parts washer*
- *Spill from Distressed Inventory Storage Area*
- *Spill from drums in Satellite Accumulation Storage Areas (2)*
- *Spill from drums in Material to be Disposed Area*

The following actions will be taken in the event of a hazardous waste spill.

1. Any employee discovering the spill will notify the Emergency Coordinator.

2. The Emergency Coordinator will determine what material has been spilled, what hazards are present as a result of the spill, and the direction and speed of travel of the spilled material.
3. The Emergency Coordinator will call a spill response contractor or call 911 and request a HAZMAT team, unless the spill is small and can be easily contained using available resources.
4. If the Emergency Coordinator determines that the incident requires evacuation of the plant, due to harmful fumes or fire or explosion potential, the fire alarm will be activated, or an evacuation announcement will be made via the PA system. Evacuation procedures as listed in Section 4.0 of this Plan will be followed.
5. If the Emergency Coordinator determines that the release could threaten human health or the environment outside the facility, he must immediately notify the Elkhart County LEPC and the National Response Center (phone numbers listed in Section 1.4).
6. The Emergency Coordinator must provide for treatment, storage, or disposal of recovered waste, contaminated soil or surface water, or any other materials generated from the cleanup.
7. Prior to reoccupation of the facility, if evacuation has occurred, the Emergency Coordinator shall assure and document, in coordination with the other emergency personnel present, that the spill(s) have been cleaned up and that a threat no longer exists to human health, welfare, or the environment.
8. As soon as possible following an emergency, all spill equipment must be serviced and returned to its original location, or replaced if necessary.
9. Any follow up reporting that may be needed due to the spill must be completed, submitted to local agencies if necessary, and documented for the facility's files.

3.4 Spill Cleanup Procedures

These procedures may only be performed by personnel who have received at least 24 hours of training at the level of Hazardous Materials Technician or Hazardous Materials Specialist.

1. Locate source of spill and stop discharge if possible: close valves, shut down pumping operations, use drum overpack, etc.
2. Identify the spilled substance and the hazards associated with the substance, including health hazards, flammability hazards, and physical hazards. Consult the MSDS sheet(s) if needed.
3. If the spilled material is flammable, remove all sources of ignition and evacuate personnel who are not involved in the cleanup area. Use only non-sparking tools during cleanup. Make sure that portable fire extinguishers are available.
4. Contain the spill to the smallest area possible. Initiate containment measures to prevent the spill from migrating off-site or into a storm drain. Use absorbent

materials in spill kits, and sand or gravel if needed to form a berm around the spilled product.

5. Cover any storm drains in the pathway of the release with a drain cover or other impervious material.
6. Contact LEPC, IDEM, and the National Response Center if the spill enters a storm drain and/or migrates off-site.
7. Clean up the spill and all contaminated absorbent materials, or assist outside agencies in clean up, per directions given by agencies.
8. Collect cleanup materials appropriately. All liquids and contaminated materials must be placed in a container marked "Hazardous Waste" and "Spill Response Clean up," and properly disposed of.
9. Clean up, restore, or replace spill response equipment and return it to its original location.
10. Follow up with outside agencies requests, if necessary, such as filing of written spill reports.

Any hazardous material spill which exceeds the CERCLA reportable quantity must be immediately reported to:

- **The National Response Center at (800) 424-8802**
- **The IDEM Emergency Response Section at (888) 233-7745 (toll-free)**
- **Elkhart County LEPC at (574) 875-3391**

See Appendix D for a list of CERCLA reportable chemicals at the Geocel facility.

3.5 Tornadoes and Severe Weather

Tornadoes or severe weather conditions, such as high winds, may result in the release of hazardous waste. If there is the potential for a weather emergency, facility management will monitor for the latest weather conditions by radio, television, or Internet, and notify personnel if they must move to the tornado shelters. Following the severe weather emergency, the Emergency Coordinator must inspect all hazardous waste storage areas for evidence of a release, and follow the procedures listed in Section 3.3 if a release has occurred.

4.0 Evacuation Plan

The procedures listed below will be followed as closely as possible; however, in specific emergency situations, the Emergency Coordinator may deviate from the procedures to provide a more effective plan for bringing the situation under control.

4.1 Alarm System

The Geocel facility is equipped with a fire alarm system that is activated by smoke detectors, water flow through the sprinkler system, or manual pull stations at exit doors. The fire alarm can also be activated by dialing 155 on a facility phone. The fire alarm is a continuous bell that can be heard throughout the building. Upon activation of the fire alarm, all employees must evacuate the building and report to their outside assembly area.

4.2 Evacuation Plan – Chain of Command

The Emergency Coordinators and Evacuation Wardens are listed in Appendix A of this Plan.

4.3 Evacuation Groups

Personnel will assemble in three groups on the west side of the building following evacuation. Designated personnel will conduct head counts of the assembled groups, and report results of the head count back to the Emergency Coordinator. All visitors, service contractors, etc. entering the plant are the responsibility of the person that they are scheduled to see. The receptionist will bring the visitors log outside to verify that all visitors are accounted for.

4.4 Evacuation Procedures

In the event plant evacuation is required, the following actions will be taken:

1. Management will make an evacuation announcement over the facility PA system or sound the fire alarm to initiate evacuation.
2. Upon hearing the fire alarm or evacuation announcement, all personnel must exit the building through the nearest exit door. If that door is blocked by fire or other hazard, they must proceed to the next closest exit door. All employees must report to their outside Assembly Area, as identified on the facility layout in Appendix B.
3. The Plant Engineer will shut down main power or gas supply if necessary and it is safe to do so.
4. The Evacuation Wardens will do a quick walkthrough of the building to determine the source of the emergency, and will meet at the front entrance for communication with the other Evacuation Wardens. During this walk-through, the Evacuation Wardens should look for persons who may be trapped or otherwise unable to evacuate, and provide assistance as needed.
5. All evacuated personnel must report to the outside Assembly Areas so they can be accounted for. Personnel must remain in the safe assembly area until the Emergency Coordinator gives the "all clear."

6. Any discrepancies in employee counts will be reported to the Emergency Coordinator so that further action may be taken with the assistance of the Fire Department or other emergency personnel arriving at the scene. No person shall re-enter the building, unless specifically authorized by the Emergency Coordinator.
7. Any visitors (non-employees) in the building at the time of an emergency will be the responsibility of the employee they are seeing at the time of the incident. The receptionist will bring the visitors log to the Assembly Area to ensure that all visitors are accounted for.
8. Re-entry of personnel into the building will be made only after all hazards are removed and the Emergency Coordinator gives clearance.

Geocel will hold evacuation drills once annually to practice these evacuation procedures, and ensure that all employees are aware of their responsibilities in the event of an emergency. Any drills or training must be consistent with the facility's ISO procedures.

4.5 Evacuation Routes/Outside Assembly Areas

Appendix B contains a facility layout showing evacuation routes and outside assembly areas for employees to gather for a head count following evacuation. Partial evacuation will be called for if an emergency threatens only one portion of the building.

Evacuation Group	Outside Assembly Area
Logistics and Compounding	Assembly Area A – west side of building
Office and Lab	Assembly Area B – west side of building
Operations and Packaging	Assembly Area C – west side of building

5.0 Reporting and Other Post Incident Actions

5.1 Contingency Plan Implementation Report Filing

As required by 40 CFR 264.56(j), any incident that requires the implementation of the Contingency Plan must be reported in writing within 15 days to the EPA Region 5 Administrator at the following address:

Regional Administrator
EPA Region 5
77 West Jackson
Chicago, IL 60604

and the Assistant Commissioner of the Indiana Department of Environmental Management, Office of Land Quality, at the following address:

Assistant Commissioner
Indiana Department of Environmental Management
Office of Land Quality
P.O. Box 6015
Indianapolis, IN 46206

The report should contain the following:

- Name, address, telephone number of owner/operator;
- Name, address, and telephone number of the facility;
- Date, time, and type of incident (e.g., fire, explosion);
- Name and quantity of material(s) involved;
- The extent of injuries, if any;
- An assessment of actual or potential hazards to human health and the environment, if applicable; and
- Estimated quantity and disposition of recovered material that resulted from the incident.

Before operations are resumed in the affected areas of the facility, the owner/operator must notify the Regional Administrator and appropriate state and local authorities that the facility is in compliance with the following:

1. No waste that may be incompatible with the released materials is treated, stored, or disposed of until cleanup procedures are completed; and
2. All emergency equipment listed in the contingency plan is cleaned and fit for its intended use before operations are resumed.

5.2 Prevention of Recurrence

Action will be taken to prevent recurrence or spread of fires, explosions or releases, including shut-down of processes and operations, collecting and containing released waste, and recovering or isolating containers. Trained personnel must handle these procedures. Facility operations will not resume until all conditions causing the original incident have been eliminated or reduced to an acceptable risk level.

5.3 Storage and Treatment

Immediately after an emergency, the Emergency Coordinator will make arrangements for treatment, storage, or disposal of recovered waste, contaminated soil, water, or any other contaminated material, if necessary. The recovered material must be handled as a hazardous waste unless it is potentially "characteristic" hazardous waste, which after testing is found not to be hazardous. The Coordinator will ensure that wastes that may be incompatible with the released material are treated, stored or disposed of until cleanup procedures are completed.

5.4 Post-Emergency Equipment Maintenance

After an emergency event, all emergency equipment will be cleaned so that it is fit for use, or it will be replaced. Before operation resumes, Evacuation Wardens will inspect all safety equipment in the area and report findings to the Emergency Coordinator. The Emergency Coordinator will then notify the Regional Administrator, state, and local authorities that post-emergency equipment maintenance has been performed, and operations will be resumed.

6.0 Coordination Arrangements

6.1 Emergency Response and Disposal Resources

The Osolo Township Fire Department will respond to an emergency call placed to '911' for the release of hazardous waste. Osolo Township has personnel trained at the First Responder level; if trained personnel are needed at the technician or specialist level, the Elkhart Fire Department will be dispatched to the site.

Any injured personnel will be transported if necessary to the Elkhart General Hospital for treatment. The Hospital will be provided with a copy of this Plan to familiarize them with information regarding the types of hazardous wastes generated at the site, and potential emergencies that may occur at the plant.

6.2 Coordination Agreements

A copy of this Contingency Plan will be maintained at the facility and submitted to the local police department, local fire department, local hospital, and Indiana Emergency Response Commission, as they may be requested to provide emergency services to the facility.

A list of agencies that have received a copy of this Plan is located on Page iii.

7.0 Amendments to the Contingency Plan

The Contingency Plan will be reviewed annually by the Emergency Coordinator, and immediately amended, if:

1. Applicable regulations are revised;
2. The plan fails in an emergency;
3. The facility changes in its operation and maintenance, or other circumstances in a way that materially increases the potential for fires, explosions, or release of hazardous waste or constituents, or changes in the response necessary in any emergency;
4. The list of Coordinators changes;
5. The list of emergency equipment changes; or
6. As required by the EPA director.

PREPAREDNESS AND PREVENTION

40 CFR 265 Subpart C

The information provided in this section pertains to the situation as it exists at the Geocel facility. Security, Inspection, Emergency Equipment, and Prevention are addressed.

8.0 Preparedness and Prevention Measures

8.1 Security

All visitors to the building must enter through the front door and sign the visitor log. The building has an electronic security system that is activated after hours. No hazardous materials are stored outside the building. These measures, in addition to security lighting outside the building after dark, reduce the potential for hazardous material releases due to vandalism or unauthorized entry.

8.2 Inspection

8.2.1 Facility Inspections

The Director of Operations is responsible for conducting weekly inspections of the hazardous waste storage areas, if applicable, and maintaining inspection logs. A visual inspection of fire extinguishers is conducted monthly.

8.2.2 Containers

Two satellite accumulation areas are located at the facility. A 55-gallon satellite drum is located outside the lab on the west side of the building, and a 55-gallon satellite drum is located in the Lab Storage area. Once the satellite drums are filled, they are closed, marked with accumulation start date, and stored in the Lab Storage area until picked up by a licensed hazardous waste hauler. Drums that are full and ready to be picked up can also be stored in the Material to be Disposed Area. All drums of hazardous waste are labeled with the words "Hazardous Waste". Waste containers must be arranged to maintain adequate aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area. IDEM recommends that fifty-five (55) gallon drums or other similar containers should be stored in rows that are no more than two (2) drums high and two (2) drums wide (see attached guidance document for details).

8.2.3 Remedial Action

If inspections reveal that non-emergency maintenance is needed, it will be completed in a timely manner to preclude further damage and reduce the need for emergency repairs. If a hazard is imminent or has already occurred during the course of an inspection, or any time between inspections, remedial action will be taken immediately.

8.3 Preventive Procedures

8.3.1 Loading/Unloading

During loading and unloading operations, spills are unlikely; however, in the event of an accident, the material spilled will be contained with standard industrial absorbent. If the spill is large, trained personnel must be called in to respond to the spill. Contaminated materials will be labeled as "hazardous waste," if necessary, and hauled to a properly permitted waste disposal site by a permitted transporter. Affected areas of the facility and equipment will be decontaminated. Precautions have been taken, and employee training conducted, to reduce the potential for hazards during loading and unloading operations.

8.3.2 Water Supplies

Water for fire fighting, sanitary and process use is provided by the city of Elkhart. The potential for surface water and ground water contamination is reduced by the storage of hazardous waste inside the building, regular inspections of waste containers, and spill kits located nearby.

8.3.3 Equipment and Power Failure

In the event of a brief power interruption, the company has an emergency lighting system that will activate to supply emergency lighting at exit points. After power failure, maintenance personnel will check for malfunctions and equipment failures, and the local service company will be contacted for assistance if needed.

8.3.4 Personnel Protection

A list of Personal Protective Equipment (PPE) required or recommended for employees is located in Appendix B of this Plan. All employees that are required to wear PPE must be trained on the proper use of such equipment, as required by the Occupational Safety and Health Standards of 29 CFR Part 1910, Subpart I - Personal Protective Equipment.

8.3.5 Ignition Prevention

As flammable chemicals are stored and used inside the plant, smoking is not allowed in these areas. Smoking is allowed only on the mezzanine level above the offices. Signs bearing the legend "No Smoking - Flammable Hazard" are placed in areas storing flammable chemicals. Portable fire extinguishers are located throughout the plant.

8.3.6 Management of Containers

Precautions are taken throughout the facility to prevent accidents, including the proper storage of containers, adequate aisle spacing, labeling and sealing of containers, and appropriate posting of warning signs. Before storage, each container is sealed and labeled. All drum storage areas are inspected on a regular basis to ensure proper storage procedures are followed.

PERSONNEL TRAINING

9.0 Training Requirements

9.1 Training Content, Frequency, and Technique

Geocel personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the Contingency Plan requirements. The training program must be directed by a person trained in hazardous waste management procedures, and must include instruction which teaches facility personnel hazardous waste management procedures (including, but not limited to, contingency plan implementation) relevant to the positions in which they are employed.

The training program is designed to ensure that facility personnel know what to do in the event of an emergency, and includes review of the following:

1. Locations and functions of emergency equipment, and procedures for using, inspecting, and repairing or replacing equipment;
2. Locations and functions of communication and alarm systems located in the building;
3. Response to fires, explosions, or chemical spills;
4. Response to water contamination incidents;
5. Shutdown operations in event of emergency; and
6. Evacuation routes and safe assembly areas outside of the building.

9.2 Implementation of Training Program

Personnel must receive the above training within six months after the date of their employment at Geocel. Employees must not work in unsupervised positions until they have completed the training requirements listed above. Facility personnel must take part in an annual review of the initial training.

9.3 Training Records

Records that document training must be maintained at the facility. Training records on current personnel must be kept until closure of the facility. Training records on former employees must be kept for at least three years from the date the employee last worked at the facility.

9.4 Job Titles and Descriptions

The following is a list of employees that handle or manage hazardous waste.

Job Title - **Emergency Coordinator (Primary Coordinator)**		
Name	*Home Address*	*Phone Number*
KERMAN PETERSON Director of Operations	58239 Gary Drive Goshen, IN ETA: 20 minutes	Work: (574) 264-0645 Home: (574) 875-8975

Applicable Training

- RCRA Training
- Hazard Communication Standard Training [29 CFR 1910.1200]
- HMIS Training

Contingency Planning Job Description

- If a release occurs, leads determination of released substance and hazards involved
- Contacts local fire department or spill response agencies if outside assistance is needed
- Contacts National Response Center, IDEM, and Elkhart County LEPC if a release which exceeds CERCLA reportable quantity has occurred
- Works with outside agencies in communicating details of the release and potential hazards involved
- Coordinates remediation of contaminated soil or water if necessary
- Responsible for follow-up reporting to outside agencies if necessary
- Responsible for emergency equipment inspection and restocking following release
- Reviews Contingency Plan annually, and makes changes as needed

General Duties and Responsibilities

- Oversees hazardous waste program at facility
- Knows how to implement emergency response procedures
- Knows the classification, identification, and verification of known and unknown material
- Knows how to perform basic control, containment, and/or confinement for small spills, within the capabilities of the resources and personal protective equipment available

Job Title - **Emergency Coordinator (Secondary Coordinator)**		
Name	***Home Address***	***Phone Number***
BRUCE KULP Maintenance Manager	21560 Channel Parkway Edwardsburg, MI *ETA: 20 minutes*	Work: (574) 264-0645 Home: (269) 699-7669

Applicable Training

- RCRA Training
- Hazard Communication Standard Training [29 CFR 1910.1200]
- HMIS Training

Contingency Planning Job Description

- Will act as Emergency Coordinator if Primary Coordinator is not available at the time of a hazardous waste emergency
- Assists in implementing strategies and objectives to safely respond to emergencies
- Assists with interpretation of the hazards associated with the type of emergency
- Assists with control and cleanup procedures
- Works with outside response agencies upon arrival, providing information on type of waste or chemicals involved in release and potential hazards
- Reviews Contingency Plan annually, and makes changes as needed

General Duties and Responsibilities

- Assists with monitoring of hazardous waste generation and storage
- Knows locations of all satellite accumulation areas and hazardous waste storage areas
- Assists with weekly inspections of hazardous waste storage areas if needed
- Knows how to perform basic control, containment, and/or confinement for small spills, within the capabilities of the resources and personal protective equipment available

Job Title - **Hazardous Waste Response Team Member**		
Name	***Home Address***	***Phone Number***
DOUG MATTIX Managing Director	23528 Broadwood Drive Elkhart, IN *ETA: 5 minutes*	Work: (574) 264-0645 Home: (574) 264-6245

Applicable Training

- RCRA Training
- Hazard Communication Standard Training [29 CFR 1910.1200]
- HMIS Training

Contingency Planning Job Description

- Assists in implementing strategies and objectives to safely respond to emergencies
- Assists with interpretation of the hazards associated with the type of emergency
- Assists with control and cleanup procedures
- Works with outside response agencies upon arrival, providing information on type of waste or chemicals involved in release and potential hazards
- Reviews Contingency Plan annually, and makes changes as needed

General Duties and Responsibilities

- Assists with monitoring of hazardous waste generation and storage
- Knows locations of all satellite accumulation areas and hazardous waste storage areas
- Assists with weekly inspections of hazardous waste storage areas if needed
- Knows how to perform basic control, containment, and/or confinement for small spills, within the capabilities of the resources and personal protective equipment available

Duties involving Hazardous Waste and Responsible Personnel

Duties Involving Hazardous Waste	Responsible Personnel
Marking accumulation start date and labeling containers with Hazardous Waste labels	Kerman Peterson
Transporting hazardous waste from satellite areas to staging/storage areas	Kerman Peterson Doug Mattix Bruce Kulp
Performing weekly inspection of hazardous waste storage areas	Kerman Peterson Doug Mattix Bruce Kulp
Signing waste manifests	Kerman Peterson Supervisors
Maintaining hazardous waste manifest copies	Kerman Peterson
Initial response and assessment to release of hazardous waste	Emergency Coordinator and/or Alternates

WARRANTY

This Contingency Plan with Emergency Response Procedures is based on information provided by the client for its specific facility. Cornerstone Environmental, Health and Safety, Inc. has exercised due diligence in analyzing and compiling the information and recommendations into this Plan. The responsibility and liability for the accuracy and completeness of the input data remains solely with the provider (client) of the information. Requests for unusual additions or corrections, or requests for representation or attendance at meetings for discussion of the information contained in the Plan; such will be subject to negotiation for additional remuneration beyond that included in the initial contract.

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CONTINGENCY PLANNING AND EMERGENCY PROCEDURES

40 CFR 265 Subpart D

The information below is submitted in accordance with the requirements for a Contingency Plan as described in 262.34 referenced to 40 CFR 264/265, Subpart D. The contingency plan is designed to minimize the hazards to human health or the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or constituents into the environment [264/265.51(a)]. Emergency procedures are to be implemented whenever there is a fire, explosion, or release of hazardous waste [264/265.56(a)].

For emergencies that extend beyond the scope of employee training, such as large fires, explosions, or chemical spills that pose a health risk to employees, Geocel will implement their Evacuation Plan and contact the local fire department and/or Local Emergency Planning Committee (LEPC). Responses to incidental releases of hazardous substances where the substance can be easily absorbed, neutralized, or otherwise controlled at the time of release by employees in the immediate release area, are not considered emergency responses within the scope of the Standard. Responses to releases below the established permissible exposure limits where there is no potential safety or health hazard are not considered to be emergency responses.

1.0 General Information

1.1 Facility Description

Geocel Corporation, located in Elkhart, Indiana, is classified under SIC Code 2891, "Adhesives and Sealants." The facility develops, manufactures, packages, and distributes sealants, coatings and adhesives for use in the light construction industry. Geocel is located in a 47,000 square foot building, which houses office, manufacturing, laboratory and storage areas. Four large bulk tanks are located to the south of the building, inside a concrete dike for secondary containment.

Geocel employs approximately 60 people and operates one shift, Monday through Friday, from 6:00am to 2:30pm. Office hours are 8:00am to 5:00pm, Monday through Friday. Geocel is currently classified as a Large Quantity Generator (LQG), based on several shipments of large quantities (greater than 2,200 pounds) of waste adhesive and spent solvent in calendar year 2003.

The facility's EPA generator number is IND069763639. A description of hazardous waste streams that is routinely generated at the Geocel facility is listed below:

1.2 Hazardous Waste Descriptions

- *Spent Solvent*
  DOT Description: Waste Petroleum Distillates
  Generation Process: Cleaning of mixing tanks between batches, as necessary, with Exxon Aromatic 100 petroleum solvent. Generation of this waste has been significantly reduced by maintaining dedicated tanks for product mixing, and re-using the solvent used for tank cleaning in subsequent batches.
  EPA Waste Codes: D001
  Hazards: Flammable waste. Heat, flame or spark may ignite waste. Breathing of vapors may cause headaches, dizziness, drowsiness, unconsciousness and other central nervous system effects. Skin contact may cause skin irritation and/or dermatitis. Personal protective equipment must be worn when handling waste.

- *End-of-run adhesive waste*
  DOT Description: Waste Flammable Liquid, n.o.s. (Aromatic Hydrocarbons, PM Acetate)
  Generation Process: End-of-run batch materials ("distressed inventory") from adhesive manufacturing process becomes hazardous waste when it has been contaminated or otherwise cannot be reworked. Generation of this waste has been reduced by emphasis on re-use of distressed inventory and dedication of a mixing tank for reworking distressed inventory.
  EPA Waste Code: D001
  Hazards: Flammable waste. Heat, flame or spark may ignite waste. May contain solvent and produce harmful vapors. Personal protective equipment must be worn when handling waste.

10.0 Appendices

Appendix A
List of Emergency Coordinators and Evacuation Wardens

Table A

EMERGENCY COORDINATORS		
NAME/TITLE	**ADDRESS**	**PHONE**
Primary Coordinator **Kerman Peterson** **Director of Operations**	58239 Gary Drive Goshen, IN *20 min. from facility*	Work: (574) 264-0645 Home: (574) 875-8975
Alternate Coordinator **Doug Mattix** **Managing Director**	23528 Broadwood Drive Elkhart, IN 46514 *5 min. from facility* .	Work: (574) 264-0645 Home: (574) 264-6245
Alternate Coordinator **Bruce Kulp** **Maintenance Manager**	21560 Channel Parkway Edwardsburg, MI *20 min. from facility*	Work: (574) 264-0645 Home: (269) 699-7669

Table B

EVACUATION WARDENS
Kerman Peterson
Bill Kulcsar
Bruce Kulp

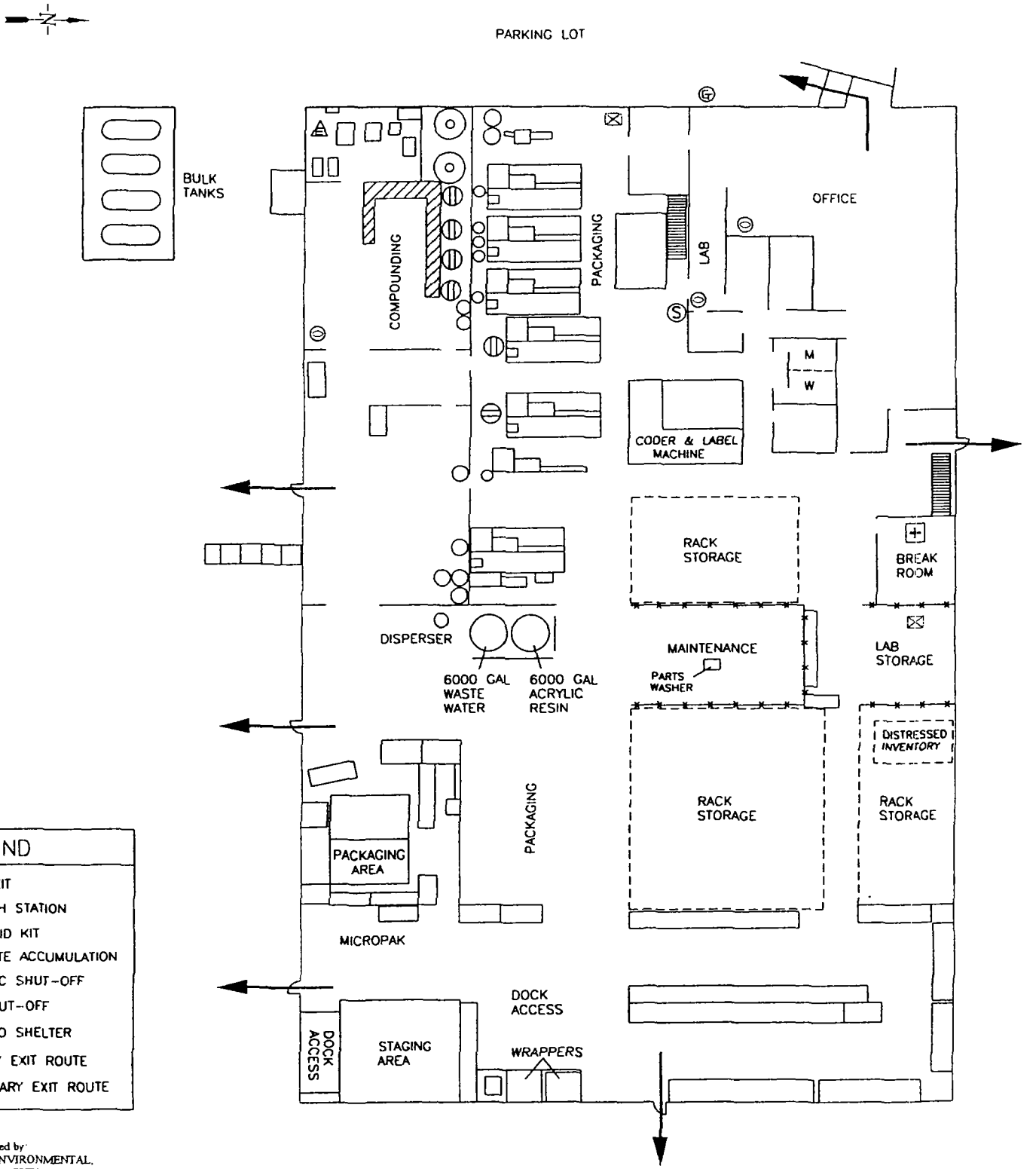
Appendix B
Facility Layout/Emergency Evacuation Routes

EVACUATION PLAN

ASSEMBLY AREA Ⓐ LOGISTICS & COMPOUNDING

ASSEMBLY AREA Ⓑ OFFICE & LAB

ASSEMBLY AREA Ⓒ OPERATIONS & PACKAGING



LEGEND

- Ⓢ SPILL KIT
- EYEWASH STATION
- FIRST AID KIT
- SATELLITE ACCUMULATION
- ELECTRIC SHUT-OFF
- GAS SHUT-OFF
- TORNADO SHELTER
- PRIMARY EXIT ROUTE
- SECONDARY EXIT ROUTE

Prepared by:
CORNERSTONE ENVIRONMENTAL, HEALTH and SAFETY, INC.

Appendix C
Emergency Equipment List

Emergency Equipment Detail

Item	Location	Equipment, Description, Capability and Emergency Function
Fire Protection		
Fixed Extinguisher Water Sprinkler	Located throughout building	Heat-activated system, provides flow of water into sprinklers to extinguish fire. Alarm sounds upon activation.
Portable Fire Extinguishers	Located throughout building	Extinguishers are easily accessible if fire fighting activity becomes necessary. Extinguishers are checked monthly by Geocel personnel, and annually by Elkhart Extinguisher Svc
Fire Alarms - Automatic	Located throughout building	Activated by smoke detectors, to notify employees of fire
Fire Alarms - Manual Pull Stations	Located near exit doors	Can be pulled to activate fire alarm.
Communications		
Internal Communication - Public Address (PA) system	All telephones have access to PA system	PA System may be used by Emergency Coordinator and others to make emergency announcements.
Two-way Radio System	N/A	N/A
Touch Tone Phone System	Phones throughout building	Enables Emergency Coordinator and others to contact outside agencies in the event of an emergency.
External Communication - Posted Emergency Numbers	Emergency Response phone numbers posted by key phone stations	All offices and plant departments are capable of calling for outside help. Emergency phone numbers are updated when changes occur.
Spill Equipment		
Spill Cart	Located outside Lab	Contains oil-dry and absorbent pigs and socks for use in cleaning up small spills
Personal Protective Equipment	Request from supervisor	Gloves, glasses and other PPE to use when cleaning up small spills
Brooms, Mops	Located throughout building	Maintain cleanliness of facility to prevent accidents & sweep up non-liquid spills.
Personal Protective Equipment		
First-Aid Station(s)	Located in employee Break Room	Contains supplies used to treat minor illnesses or injuries.
Eye-wash Station(s)	Two stations – located in Lab and Compounding Area	Capable of flushing eyes w/ solution in the event of chemical or other irritant in eye.
Safety Glasses	Mandatory use when handling hazardous waste	Eye protection from chemicals or other foreign objects.
Aprons	Recommended use when handling hazardous waste	Protection of body and clothing from contact with hazardous chemicals
Respirators	Optional – available from supervisors	Protection from inhalation of harmful vapors and/or particulates.
Gloves	Mandatory use when handling hazardous waste	Protection of hands from contact with hazardous chemicals.

Appendix D
CERCLA List of Reportable Chemicals

EPA SARA Title III Section 304 CERCLA GEOCEL CORPORATION

CLIENT: 2068 *REPORTING YEAR: 2003* *PRINT DATE: 2/25/04*

Cas Number	Chemical Name	RQ Lbs
100-41-4	ETHYLBENZENE	1,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31201	Inactive	POLYSAT, INC.	POLYSAT AMR-50% AR100 (AMR50)	14,000.0	1.5 %	210.0	No
31276	Active	BOSTIK INCORPORATED	GEOCEL 3500 ALL COLORS	8,400.0	3.0 %	252.0	No

Cas Number	Chemical Name	RQ Lbs
100-42-5	STYRENE	1,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31218	Inactive	HARLOW CHEMICAL COMPANY	REVACRYL 245	6,600.0	N/D %	N/D	No
31219	Active	HARLOW CHEMICAL COMPANY	REVACRYL DP 4228	12,600.0	N/D %	N/D	No
31220	Active	HARLOW CHEMICAL COMPANY	REVACRYL DP4776	6,600.0	N/D %	N/D	No
31280	Active	NOVA CHEMICALS INCORPORATED	DYLARK ENGINEERING RESINS - IMPACT GRADE	11,000.0	0.3 %	33.0	No
31292	Active	EXXONMOBIL CHEMICAL COMPANY	3139 NAPHTHA (MINERAL SPIRITS)	400.0	N/D %	N/D	No

Cas Number	Chemical Name	RQ Lbs
100-44-7	BENZYL CHLORIDE	100

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
37121	Active	OSI SPECIALTIES, INC.	SILQUEST A-1128 SILANE	430.0	0.3 %	1.3	Yes

Cas Number	Chemical Name	RQ Lbs
101-68-8	4,4'-DIPHENYLMETHANE ISOCYANATE	5,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31276	Active	BOSTIK INCORPORATED	GEOCEL 3500 ALL COLORS	8,400.0	0.6 %	46.2	No

EPA SARA Title III Section 304 CERCLA GEOCEL CORPORATION

CLIENT: 2068 *REPORTING YEAR: 2003* *PRINT DATE: 2/25/04*

Cas Number	Chemical Name	RQ Lbs
107-13-1	ACRYLONITRILE	100

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31253	Active	UNION CARBIDE	UCAR LATEX 123	1,500.0	0.0 %	0.0	Yes
35465	Active	EXPANCEL	EXPANCEL DE (551-20; 551; 551-80)	80.0	0.0 %	0.0	Yes

Cas Number	Chemical Name	RQ Lbs
107-15-3	ETHYLENEDIAMINE	5,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31227	Active	DOW CORNING CORP	SILANE(R) Z 6020	40.0	0.7 %	0.3	Yes
37122	Active	OSI SPECIALTIES, INCORPORATED	SILQUEST A-1120 SILANE	430.0	2.0 %	8.6	Yes

Cas Number	Chemical Name	RQ Lbs
107-21-1	ETHYLENE GLYCOL	5,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31281	Active	THE DOW CHEMICAL COMPANY	ETHYLENE GLYCOL INDUSTRIAL GRADE	700.0	99.0 %	693.0	No
37111	Active	AIR PRODUCTS AND CHEMICALS INC.	SURFYNOL 104H SURFACTANT	40.0	25.0 %	10.0	No

Cas Number	Chemical Name	RQ Lbs
108-05-4	VINYL ACETATE	5,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
39791	Active	UNION CARBIDE CORPORATION	UCAR LAYEX 367		0.1 %	N/D	Yes

Cas Number	Chemical Name	RQ Lbs
123-91-1	1,4-DIOXANE	100

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31281	Active	THE DOW CHEMICAL COMPANY	ETHYLENE GLYCOL INDUSTRIAL GRADE	700.0	0.5 %	3.5	No
31283	Active	COGNIS CORPORATION	FOAMASTER NXZ	450.0	0.0 %	0.0	No
39790	Active	UNION CARBIDE CORPORATION	TERGITOL NP-9 SURFACTANT		0.0 %	N/D	No

EPA SARA Title III Section 304 CERCLA GEOCEL CORPORATION

CLIENT: 2068 *REPORTING YEAR: 2003* *PRINT DATE: 2/25/04*

Cas Number	Chemical Name	RQ Lbs
126-99-8	2-CHLORO-1,3-BUTADIENE	100

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
35446	Active	DUPONT DOW ELASTOMERS L.L.C.	AQUASTIK 1120 (NEOPRENE LATEX 115)	259.0	0.5 %	1.3	No

Cas Number	Chemical Name	RQ Lbs
127-18-4	TETRACHLOROETHYLENE	100

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31185	Active	THE DOW CHEMICAL COMPANY	PERCHLOROETHYLENE INDUSTRIAL (PERC)	52,000.0	99.9 %	51,948.0	No

Cas Number	Chemical Name	RQ Lbs
1310-73-2	SODIUM HYDROXIDE	1,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
37105	Active	AVECIA, INC.	PROXEL GXL	50.0	6.0 %	3.0	No

Cas Number	Chemical Name	RQ Lbs
1330-20-7	XYLENE	100

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31201	Inactive	POLYSAT, INC.	POLYSAT AMR-50% AR100 (AMR50)	14,000.0	5.0 %	700.0	No
31276	Active	BOSTIK INCORPORATED	GEOCEL 3500 ALL COLORS	8,400.0	7.5 %	630.0	No
35444	Active	ATOFINA CHEMICALS, INC.	BIOMET (R) 304/60 ANTIFOULING AGENT	465.0	40.0 %	186.0	No
35469	Active	ELEMENTIS SPECIALTIES	TINT-AYD ST 8703 PHTHALO GREEN	10.0	N/D %	N/D	No
37110	Active	ELEMENTIS SPECIALTIES	TINT-AYD ST 8317 TINTING BLACK	80.0	N/D %	N/D	No
37479	Active	EXXON MOBIL CHEMICAL COMPANY	AROMATIC 100 FLUID	42,000.0	3.0 %	1,260.0	No
37622	Active	POLYSAT, INC.	POLYSAT AMR-50% AR100	14,000.0	1.8 %	245.0	No

EPA SARA Title III Section 304 CERCLA GEOCEL CORPORATION

CLIENT: 2068 *REPORTING YEAR: 2003* *PRINT DATE: 2/25/04*

Cas Number	Chemical Name	RQ Lbs
1336-21-6	AMMONIUM HYDROXIDE	1,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31269	Active	VOPAK USA INC.	AMMONIUM HYDROXIDE (20-30% NH3)	140.0	20.0 %	28.0	No

Cas Number	Chemical Name	RQ Lbs
50-00-0	FORMALDEHYDE	100

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31244	Active	ROHM AND HAAS COMPANY	TAMOL 850 DISPERSANT	525.0	0.1 %	0.3	Yes
31255	Active	UNION CARBIDE	UCAR LATEX 169S	10,400.0	0.0 %	1.0	Yes
39790	Active	UNION CARBIDE CORPORATION	TERGITOL NP-9 SURFACTANT		0.0 %	N/D	Yes

Cas Number	Chemical Name	RQ Lbs
64-19-7	ACETIC ACID	5,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31281	Active	THE DOW CHEMICAL COMPANY	ETHYLENE GLYCOL INDUSTRIAL GRADE	700.0	0.0 %	0.0	No

Cas Number	Chemical Name	RQ Lbs
67-56-1	*METHYL ALCOHOL*	*5,000*

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31228	Active	DOW CORNING CORP	SILANE Z-6032	330.0	55.0 %	181.5	No
31229	Active	DOW CORNING CORP	SILANE Z-6040	40.0	5.0 %	2.0	No
37121	Active	OSI SPECIALTIES, INC.	SILQUEST A-1128 SILANE	430.0	60.0 %	258.0	No
37122	Active	OSI SPECIALTIES, INCORPORATED	SILQUEST A-1120 SILANE	430.0	3.0 %	12.9	No

Cas Number	Chemical Name	RQ Lbs
67-64-1	ACETONE	5,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
39798	Active	ILLBRUCK SEALANT SYSYTEMS, INC.	MULTICLEANER: GUN FOAM/SPRAY CLEANER	50.0	60.0 %	30.0	No

EPA SARA Title III Section 304 CERCLA GEOCEL CORPORATION

CLIENT: 2068 *REPORTING YEAR: 2003* *PRINT DATE: 2/25/04*

Cas Number	Chemical Name	RQ Lbs
7439-92-1	LEAD	10

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem. Lbs	EHS(302)
35461	Active	ZINC CORPORATION OF AMERICA	KADOX ZINC OXIDE	1,000.0	0.0 %	0.0	No

Cas Number	Chemical Name	RQ Lbs
7440-43-9	CADMIUM	10

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem. Lbs	EHS(302)
35461	Active	ZINC CORPORATION OF AMERICA	KADOX ZINC OXIDE	1,000.0	0.0 %	0.0	No

Cas Number	Chemical Name	RQ Lbs
7440-66-6	ZINC	1,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem. Lbs	EHS(302)
31275	Inactive	CALGON CORPORATION	CALGON COMPOSITION T	100.0	9.8 %	9.8	No
39797	Active	CALGON CORPORATION	CALGON COMPOSITION T	100.0	7.5 %	7.5	No

Cas Number	Chemical Name	RQ Lbs
75-07-0	ACETALDEHYDE	1,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem. Lbs	EHS(302)
31281	Active	THE DOW CHEMICAL COMPANY	ETHYLENE GLYCOL INDUSTRIAL GRADE	700.0	0.0 %	0.0	No
31283	Active	COGNIS CORPORATION	FOAMASTER NXZ	450.0	0.0 %	0.0	No
39790	Active	UNION CARBIDE CORPORATION	TERGITOL NP-9 SURFACTANT		0.0 %	N/D	No
39791	Active	UNION CARBIDE CORPORATION	UCAR LAYEX 367		0.0 %	N/D	No

EPA SARA Title III Section 304 CERCLA GEOCEL CORPORATION

CLIENT: 2068 *REPORTING YEAR: 2003* *PRINT DATE: 2/25/04*

Cas Number	Chemical Name	RQ Lbs
75-21-8	ETHYLENE OXIDE	10

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31283	Active	COGNIS CORPORATION	FOAMASTER NXZ	450.0	0.0 %	0.0	Yes
39790	Active	UNION CARBIDE CORPORATION	TERGITOL NP-9 SURFACTANT		0.0 %	N/D	Yes
39790	Active	UNION CARBIDE CORPORATION	TERGITOL NP-9 SURFACTANT		0.0 %	N/D	Yes

Cas Number	Chemical Name	RQ Lbs
75-35-4	VINYLIDENE CHLORIDE	100

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
35465	Active	EXPANCEL	EXPANCEL DE (551-20; 551; 551-80)	80.0	0.5 %	0.4	No

Cas Number	Chemical Name	RQ Lbs
75-56-9	PROPYLENE OXIDE	100

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31283	Active	COGNIS CORPORATION	FOAMASTER NXZ	450.0	0.0 %	0.0	Yes

Cas Number	Chemical Name	RQ Lbs
7601-54-9	SODIUM PHOSPHATE TRIBASIC	5,000

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
39797	Active	CALGON CORPORATION	CALGON COMPOSITION T	100.0	N/D %	N/D	No

Cas Number	Chemical Name	RQ Lbs
7664-41-7	AMMONIA	100

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31253	Active	UNION CARBIDE	UCAR LATEX 123	1,500.0	0.2 %	3.0	Yes
31267	Inactive	ROHM AND HAAS COMPANY	ZINPLEX 15	550.0	6.8 %	37.4	Yes

EPA SARA Title III Section 304 CERCLA GEOCEL CORPORATION

CLIENT: 2068 *REPORTING YEAR: 2003* *PRINT DATE: 2/25/04*

Cas Number	Chemical Name	RQ Lbs
85-68-7	BENZYL BUTYL PHTHALATE	100

MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31225	Active	SOLUTIA, INC.	SANTICIZER 160 PLASTICIZER (S-160)	900.0	98.0 %	882.0	No

Cas Number	Chemical Name	RQ Lbs
98-82-8	CUMENE	5,000

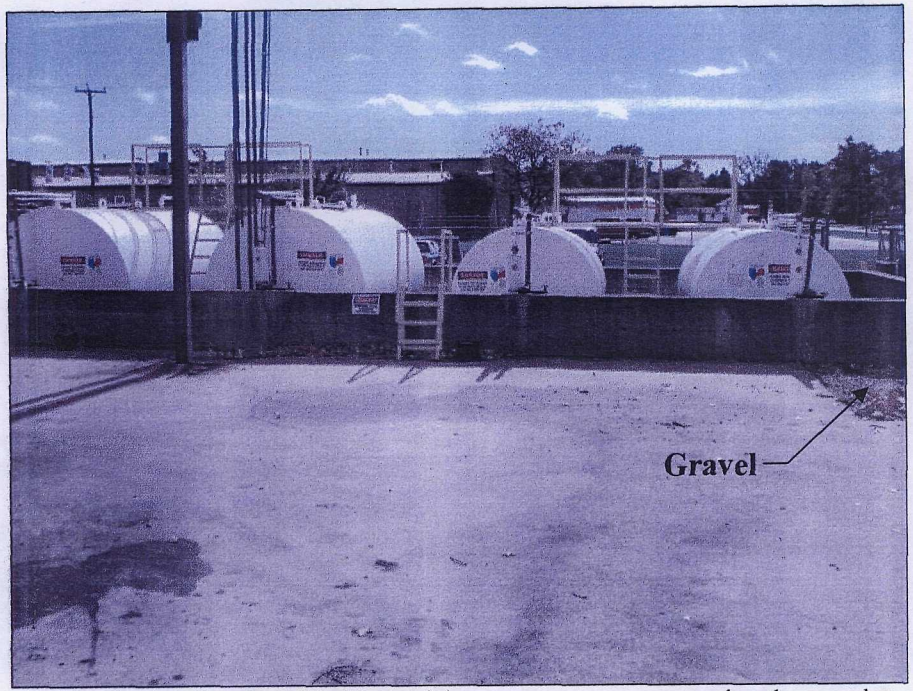
MSDS	Status	Manufacturer	Product Name	Max Lbs	Percent	Chem Lbs	EHS(302)
31201	Inactive	POLYSAT, INC.	POLYSAT AMR-50% AR100 (AMR50)	14,000.0	5.0 %	700.0	No
37110	Active	ELEMENTIS SPECIALTIES	TINT-AYD ST 8317 TINTING BLACK	80.0	N/D %	N/D	No
37479	Active	EXXON MOBIL CHEMICAL COMPANY	AROMATIC 100 FLUID	42,000.0	1.5 %	630.0	No
37622	Active	POLYSAT, INC.	POLYSAT AMR-50% AR100	14,000.0	1.0 %	140.0	No

APPENDIX D

Photographic Documentation

Looking Southeast at Site Building

General View Looking East Across Southern Portion of Site



Looking South at Exterior ASTs (Note staining on concrete pavement and on the secondary containment structure below the AST fill pipes)

Remote Fill Manifold for Interior ASTs Located at Southwestern Exterior of Building (Note staining on concrete pavement and containment structure)

Empty Drum Storage along Southern Exterior of Building

Staining and Deteriorated Asphalt Near Empty Drum Storage Area

Typical Staining on Concrete Floor in Interior Chemical Storage Area

Trench Drain System Throughout Chemical Storage/Mixing Area

APPENDIX E

UST Removal Documentation

A-1 DISPOSAL CORPORATION

Commercial Pumping and Incineration Division
P.O. Box 248 • 400 Broad Street • Plainwell, MI 49080 • 616-685-9801

May 15, 1986

Mr. Larry Stickel
Geocel Corporation
P.O. Box 398
53280 Marina Drive
Elkhart, Indiana 46515

Re: Underground storage tanks

Dear Mr. Stickel:

This letter is in regards to 4 - 6,000 underground storage tanks we removed from your facility at 53280 Marina Drive, Elkhart, Indiana prior to May 1, 1986. Upon visual inspection we did not detect any evidence of leakage, and found said tanks to be in good condition.

If you have any questions or if I can be of further service, please contact me at your convenience.

Thank you.

Sincerely,

Lynn Jensen
Project Corrdinator

LJ/cf

RECEIVED MAY 19 1986

APPENDIX F

Qualifications of RES Personnel Performing the Assessment

JEFFREY C. ROBERTS

President/Senior Project Manager

ROBERTS ENVIRONMENTAL SERVICES, LLC

Education, Certifications, & Training

BS Biology and Environmental Studies (Dual Major), Manchester College, 1990
Indiana Licensed Well Driller #2121
OSHA 40hr. Hazardous Materials Health & Safety Training
American Red Cross CPR Training
Indiana Asbestos Building Inspector #191012086

Employment History

Roberts Environmental Services, LLC - May 2002 to Present
AVANT Group, Inc. - November 2000 to May 2002
Triad Engineering, Inc. - July 1997 to November 2000
ATEC/ATC Associates, Inc. - May 1990 to July 1997

Project Experience

Mr. Roberts is the President and founder of Roberts Environmental Services, LLC. He has managed a variety of environmental projects over the past 16 years. His primary project management experience relates to Phase I Environmental Site Assessments, subsurface investigations, selection and implementation of soil and ground water remediation methods, underground storage tank closures, and asbestos inspections.

Phase I Environmental Site Assessment project management experience includes properties ranging in size from less than 1.0-acre to several hundred acres that were undeveloped or used for residential, commercial, or industrial purposes. Mr. Roberts has performed hundreds of Phase I Environmental Site Assessments for municipalities, individuals, attorneys, developers, real estate companies, lending institutions, and corporations.

Mr. Roberts has developed and implemented work-scopes to investigate soil and ground water conditions relative to potential on-site and offsite sources of contamination at various commercial and industrial facilities. These subsurface investigations have addressed potential petroleum and/or chemical contamination in soil and ground water. Common methods utilized to collect soil and/or ground water samples have included hollow-stem auger drilling, direct-push technology (i.e., Geoprobe®, Earthprobe®, and other similar equipment), hand-auger drilling, and test pits. Ground water monitoring wells were installed during some of these subsurface investigations to determine site-specific ground water conditions, such as ground water flow direction and gradient.

Ground water remediation experience includes the selection and implementation of remediation methods for petroleum-related compounds. Mr. Roberts has also managed remediation projects involving soils impacted by petroleum-related compounds and chlorinated solvents.

Project management activities relating to underground storage tanks have included budgeting, contractor scheduling, submission of proper state and local notices, performing closure assessments of the tank excavation, and completion of closure reports. Mr. Roberts has also completed investigations and reports required by regulatory agencies for leaking underground storage tanks.

Mr. Roberts has performed numerous asbestos inspections of residential, commercial, and industrial facilities. The inspections were either performed as part of a property transfer or in order to satisfy federal, state, and local regulations pertaining to pre-demolition/renovation activities.

DAVID D. JEFFERS, L.P.G.

Hydrogeologist/Project Manager

ROBERTS ENVIRONMENTAL SERVICES, LLC

EDUCATION

Masters of Science (ABT) Hydrogeology
*Wright State Univ. - Dayton, Ohio**

Bachelors of Science - Geology
University of Dayton, OH, 1992

CERTIFICATION/TRAINING

State of Indiana Licensed Professional Geologist No. 1862

Indiana Licensed Well Driller #2073

OSHA 40hr. Hazardous Materials Health and Safety

American Red Cross CPR

AFFILIATIONS

National Ground Water Association, (NGWA) Division of Groundwater Scientists and Engineers

Vice-Chairperson
St. Joseph County, Indiana
Water Advisory Board

National Ground Water Association (NGWA) Wellhead Protection Interest Group Committee

St. Joseph County, Indiana
Septic Ordinance Review Committee

St. Joseph County, Indiana
Confined Animal Feeding Operation
Technical Advisory Committee

SPEAKING ENGAGEMENTS

Guest Speaker – "Ionia's WHPP"
MDEQ Wellhead Protection
Seminar – Mt Pleasant 2002

Key Note Speaker – "WHPPs"
Michigan Assoc. of Professional
Geologists – Kalamazoo 2000

Guest Speaker – "Well Profiling"
Michigan AWWA Regional Meeting
South Haven 2001

EMPLOYMENT HISTORY

EIS Environmental Engineers, Inc. – September 1994 to July 1996
Triad Engineering, Inc. – July 1996 to July 1999
Peerless-Midwest, Inc. – July 1999 to May 2003

PROFESSIONAL EXPERIENCE

Mr. Jeffers has over twelve (12) years experience as a Hydrogeologist. His experience includes the site characterization of UST systems, landfills, nuclear power plants, bulk petroleum terminalling sites, and metal plating facilities among others. He has been involved in a wide variety of sites affected by gasoline, jet fuel, diesel, heating oil, aviation gasoline, heavy metals, and chlorinated solvents. Mr. Jeffers also has experience in asbestos building inspections, Phase I Site Assessments, brownfields, statistical analysis of landfill GW monitoring parameters, the design, operation, and maintenance of soil vapor extraction (SVE) and air sparging systems, UST removals, closures, & clean-ups.

Mr. Jeffers has extensive experience in groundwater and contaminant transport modeling, municipal water supply development, aquifer testing and analysis, and wellhead protection area (WHPA) delineation and management. He has been involved with over fifty (50) approved wellhead protection studies in Michigan, Indiana, and Ohio. He has implemented several innovative and cost-effective wellhead protection plan (WHPP) activities during his work. In addition to being one of five persons in North America leading NGWA's WHP Interest Group Committee, Mr. Jeffers was project manager for a Michigan AWWA Exemplary Wellhead Protection Program award-winning community.

Phase I Environmental Site Assessment experience includes a wide-variety of industrial, commercial, and residential properties. Mr. Jeffers has been involved with monitored natural attenuation, active remediation, and risk-based corrective actions. Common methods utilized to collect soil and/or groundwater samples have included hollow-stem auger drilling, direct push technology (i.e., Geoprobe®, Earthprobe®, and other similar equipment), hand-auger drilling, and test pits. He has also employed directional drilling under buildings, resistivity/conductivity, gamma-logging, and ground penetrating radar (GPR).

Mr. Jeffers has also performed numerous asbestos inspections of residential, commercial, industrial, and municipal facilities. He has also conducted abatement oversight activities. He has managed the inspections at historic university libraries, 150,000-square feet industrial complexes, municipal wastewater treatment plants, city halls, police academies, and residential dwellings, among others.

PUBLICATIONS

Edwards, David A., Conley, Denis M., Beikirch, Michael G., **Jeffers, David D.**, *Surfactant Applications in Environmental Restoration*, In: Proceedings of the Twenty-Eighth Mid-Atlantic Industrial and Hazardous Waste Conference, Buffalo, NY 1996.

* Recipient of 1994 NGWA-AGWSE Graduate Research Fellowship. ABT = All but Thesis completed.