US EPA RECORDS CENTER REGION 5
412904

ANCO PRODUCTS, INC.

API

Our Energy Saves You Energy.®

a subsidiary of API Group, Inc.

Date May 30, 2011

Name **Andy McCleery**
Title President / CEO
Company Anco Product Inc
Address 2500 South 17th Street
Address Elkhart, IN. 46517

To whom it may Concern:

This memo is in response to a request for information Pursuant to Section 104(e) of CERCLA for Lusher Street Groundwater Contamination Site.

Answers to questions as per Enclosure 4.

1. The property at 2500 South 17th Street was purchased by Lee Anderson from Dietzgen Corporation July 7, 1977. Anco Products Inc. was already in production at 1627 W Lusher Ave. Elkhart, IN. since 1972 and moved to the new location in 1979. (Appendices A: Property Timeline & B: CHES Preliminary Site Assessment)
2. During the years 1977 to 1985, Trichloroethylene (TCE) was used for cleaning of metal moving parts. Specifically, cleaning mandrels used for manufacturing flexible duct of adhesive build-up.
   a. The chemical was bought in the liquid, cold vapor state in usually 55 gallon drum increments. (Appendix E: TCE Purchase Documents)
   b. Purchases were made from the Ashland Chemical Company located in South Bend. (Appendix E: TCE Purchase Documents)
   c. We have affidavits from former employees testifying to the use of TCE at the time. (Appendix D: Affidavits regarding TCE use at Anco)
   d. Purchase records show that a total of 2660 gallons of TCE was purchased. (Appendix E: TCE Purchase Documents)
3. Waste Management Units:
   a. Presently:
      i. Anco uses a 45 yard compactor for its solid waste disposal. The compactor is serviced by Himco Waste Away group.
      ii. We also use two 30 yard open top containers for the segregation and collection of OCC and clear plastic recycling.
      iii. Hydraulic oil waste is removed by Crystal Clean in quantities of one 55 gallon drum a year. Other universal

Anco Products, Inc.
2500 17th Street
Elkhart, IN 46517

Information
info@AncoProductsInc.us
www.AncoProductsInc.com

Phone
574.293.5574
800.837.ANCO (2626)

Fax
574.295.6235

APi Group, Inc.
www.APiGroupInc.com

waste is also disposed of through Crystal Clean on an as-needed basis.

b. Previously:
   i. Two underground storage tanks (UST) were installed on the property by the previous owner, Dietgzen Corp.. These tanks were constructed of Stainless steel and approximately held 5000 gallons each. The UST's were located at the South end of the building under an area now covered with concrete. Previous investigations have revealed that these were used to store Acetone and Toluene, solvents used in the manufacture of drafting and specialty paper products. In 1989, these UST's were discovered, cleaned, neutralized and efforts began to have them environmentally closed out. Soil samples surrounding the UST's were taken and analyzed for Acetone and Toluene. Four sample wells were installed to monitor and test the ground water on the property for possible contamination. In 1991 the UST's were given approval by IDEM for close-out and filled with an inert material (sand). (Appendices B: CHES Preliminary Site Assessment, H: Tank Assessment, John Wallace & I: UST Closure Notification)

4. As we have previously testified: to the knowledge of Anco Products Inc. there have been no leaks, spills or releases of chlorinated solvents at this facility. (Appendices C: Plews & Shadley response from USA VS Walerko Tool subpoena, L: TCE, TCA Findings 1994, M: Groundwater Sampling & Analysis 1995, & N: Groundwater Sampling & Analysis 1999)
5. Permits
   a. Current and past permits include Part 70 Title V Air Permits numbered and dated as follows: Copies of the permits can be viewed using IDEM CAATS: (Appendix F: Air Permits & History) http://www.in.gov/apps/idem/caats/loadPermitApplication.jspx?id=70849180309841Idem
      i. FESOP 039-6389-00069, issued December 1996
      ii. FESOP minor revision 039-8111-00069, issued August 1997
      iii. T039-9008-00069, issued December 1998
      iv. First Re-opening R039-13210-00069, issued December 2001
      v. Administrative amendment 039-20097-00069, issued September 2005
      vi. T039-17563-00069, issued June, 2007
      vii. Significant Modification 039-28476-00069, issued April, 2010
   b. NPDES permits (Appendix G: NPDES Permits)
      i. INR 00A037
      1. Storm water samples taken July 1993
      2. Pollution Prevention Plan completed Oct 1993
      3. Storm water samples taken July 1994
      4. Storm water samples taken March 1997
      ii. INR210222: No Exposure Exclusion filed Dec. 2009.
6. All information regarding this request is included in the attachments

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and history gathered in previous investigations. (Appendices C: Plew & Shadley response to USA VS Walerko Tool subpoena, J: Continuing Investigation Report April 1993, K: Continuing Investigation Report May 1993, L: TCE, TCA Findings 1994, M: Groundwater Sampling & Analysis 1995, and N: Groundwater Sampling & Analysis 1999)

7. All information regarding this request is included in the attachments and history gathered in previous investigations. (Appendices C: Plew & Shadley response to USA VS Walerko Tool subpoena, J: Continuing Investigation Report April 1993, K: Continuing Investigation Report May 1993, L: TCE, TCA Findings 1994, M: Groundwater Sampling & Analysis 1995, and N: Groundwater Sampling & Analysis 1999)

References and Supporting Documents

1. Appendix A: 2500 South 17th Street Property Timeline
2. Appendix B: Preliminary Site Assessment performed by CHES Consultants
3. Appendix C: Plews & Shadley reports from subpoena of Anco in USA VS Walerko Tool
4. Appendix D: Affidavits of Mary Wirt and Georgia Shephard regarding TCE at Anco
5. Appendix E: TCE purchase documents requested for Information Sharing & CERCLIS SITES
6. Appendix F: Air Permits: searching under source: Anco Products Inc http://www.in.gov/apps/idem/caats/loadPermitApplication.jspx?id=70849180309841
7. Appendix G: NPDES Permits INR 00A037 & INR 210222
8. Appendix H: Tank Assessment: John Wallace Inc.
9. Appendix I: UST Closure Notification form
10. Appendix J: Continuing Investigation Report April 1993
11. Appendix K: Continuing Investigation Report May 1993
12. Appendix L: TCE, TCA Findings 1994
13. Appendix M: Groundwater Sampling & Analysis 1995
14. Appendix N: Groundwater Sampling & Analysis 1999

We hope this has answered all your questions to a satisfactory level.

Sincerely,

Andrew McCleery
President / CEO

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Elkhart, IN 46517

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2500 South 17th, Elkhart, IN. Property Timeline

1960: Building built by Central warehouse Corp.

1969: Land made part of Concord Township

1975: Land & structure purchased by Dietzgen

1977: Land & structure purchased by Lee Anderson

1983: Gemeinhardt violation

1984: Bock GW contamination found

1987: Honey RV GW contamination found

Elkhart Co. Health Dept begin Lusher Street Program

1989: IDEM begin own water testing in Lusher area

1990 - 1996: samples taken yearly at Anco sample wells

1999: Last run of GW sample taken from Anco wells

2006: IDEM additional testing at Lusher site

2007: Lusher site proposed for National Priorities Listing

1959: (2) wells installed on property By Dietzgen

1972: Anco Products Inc. Established Lusher St, Elkhart

1977: first record of TCE purchase @ Anco

1979: Glass line bought & production begin @ 2500 17th St. address

1985: TCE discontinued @ Anco total amount = 2660 gal

1987: Anco sell South portion of land to UPS

1989: UST discovered, cleaned & neutralized

1990: Sample wells installed @ Anco for UST closeout sampling

1991: IDEM approval of UST Close Out

1993: USA vs Walerko Tool, Anco Subpoena for information regarding TCE & TCA in manufacturing & possible release (Plews & Shandley)

2009: EPA begin Phased Remedial Investigation of Lusher site resulting in 2010 report identifying potential sources of GW contamination at Lusher site. Information being gathered for use in making an enforcement decision

PRELIMINARY SITE ASSESSMENT
ANCO PRODUCTS, INC.
2500 SOUTH SEVENTEENTH STREET

INTRODUCTION:

As a result of recent Federal Court interpretation of CERCLA, buyers and lenders, insurers and others establishing more than casual contractual relationship with "owners" of commercial property, may be exposed to serious environmental liability. Parties contemplating contractual relationship should make informed decisions with regard to potential environmental liability.

The use of an environmental audit will provide systematic, documented and objective review of environmental requirements peculiar to the site in question. The information contained herein should provide Anco Products, Incorporated, of Elkhart, Indiana and Mr. Lee Anderson of St. Paul, Minnesota with the necessary information to allow for an informed decision to be made with regard to any possible environmental liability.

PURPOSE:

The purpose of this document is to provide an outline of activities completed and the additional steps necessary for the determination of environmental *and subsurface* conditions associated with properties;

1) A portion of A parcel of land in the Northeast Quarter of Section 18, Township 37 ex. 1.72A ex.5.34A. 2) Pt Northeast ex. 4.35A ex. .17A ex.14.06A Section 18 5.91A and 3) Pt South 1/2 Northeast 1/4 Section 18 561.3' S N Line S 1/2 Northeast 1/4 160' by 468.78' 1.72A.
A part of the northeast quarter (NE 1/4) of section eighteen (18), township Thirty-seven (37) North, Range five (5) East, In Concord Township, Elkhart County, Indiana;

Also Known As: 2500 South Seventeen Street, Elkhart, Indiana.

Objective: To assess the above-mentioned site for possible soil and groundwater contamination sources and a preliminary risk assessment of any possible source(s) in relation to the extent and seriousness of any possible contamination, with a suggested course of action in relation to the findings.

SITE HISTORY

The purpose of conducting a site history research is to try and recognize the contributing factors relevant to the past usage of the property in question.

The building, which appears on the property, was apparently built on or about the year 1960. The purpose and intent of the facility was that of a warehouse for Central Warehouse of Elkhart Indiana.

In July of 1975 the property was transferred to the Dietzgen Corporation who used the facility for paper related manufacturing. The Dietzgen company had installed Underground Storage Tanks for materials related to their manufacturing processes. It was learned through conversations with Mr. Frank Bach of Osceola, Indiana, formerly of Dietzgen Corporation, that the tanks were used for storage of acetone (see attached M.S.D.S., for data concerning product).

METHOD:

The site was subjected to a walk-through survey on April 27, 1989. This was to make a visual determination as to the additional steps needed for the completion of project. Through cooperative efforts with public servants associated with the Township Assessor and Recorders offices, certain factors have been ascertained as to the type of business operations *[as stated previously]* associated with this site over the years.

FINDINGS:

The current usage of this property is for the manufacturing of insulating products and flexible air ducts. The facility was found to be using the city sewer system for wastewater disposal and also had city water. It was also learned through conversations with Mr. David Simmmons from Indiana's Department of Natural Resources, that a well exists at this facility, installed at the direction of the Dietzgen Company.

It has been learned, through conversations with Mr. Howard Tomlinson, Mr. Gary Luft and Mr. Al Guantino of Anco Products, Incorporated and Mr. Frank Bach formerly of Dietzgen Corporation that two *closed* tanks exist at the south end of the building . It was further learned that the method of closure for these tanks was filling with inert material; filled with sand. This process was believed to of been completed before transfer of property to Mr. Lee R. Anderson.

DISCUSSION:

In that most recent property acquisition have been marked by concern, due to environmental risk, it has become more and more appropriate to ascertain necessary and cost effective measures for making assurances to all parties involved with the properties in question that all efforts have been made to minimize the associated *environmental liability.* The most effective way of doing is to conduct an audit of the status of the facility with respect to environmental regulations and standards. If there are areas identified with environmental problems, an agreement for the remediation (e.g. cleanup of contaminated areas) that is agreeable to all parties involved, as far as distribution of cost for said cleanup, needs to be developed.

Under CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act), an innocent landowner may avoid liability if he meets the requirements of a third-party defense. To establish *third-party*, you must establish that neither you nor anyone to whom you are contracted to, caused property to become *environmentally unsound (contaminated).* Those persons under the term "contractual relationship" includes, but is not limited to, land contracts, deeds or other instruments transferring title or possession.

It does not seem likely that the intention of the laws pertaining to environmental liability were intended to suggest that property perceived as a "risk" be allowed to be deemed "unusable", but rather those parties involved establish a "Commitment to follow-up on audit findings".

RECOMMENDATIONS AND CONCLUSIONS:

There are certain areas of concern that need be addressed;

* Subsurface soils and waters associated with the Underground Storage Tanks should be tested to insure that releases have not occurred.

* Monitor wells need to be installed at several points to adequately define onsight impact (see attached; proposed work map).

* Surface soils should be taken at several areas near the railroad tracks at the east side of the building. This will help assess whether or not "house-keeping" practices have had an adverse impact on the environment (see work map).

* Transformer fluids will be sampled to assess the presence of PCBs.

* Soils associated with the dust collectors will have to be analyzed.

* Metal detection and/or a probing apparatus will be used to determine if tanks exist in the asphalt parking lot, to the north end of the building (see attached work map).

C.H.E.S. Consultants, Incorporated, will assess the condition of tanks and determine, if in fact they have been closed properly. This will be done by accessing the manhole area and allowing adequate time for Ventilation before taking appropriate readings while using a Sensydine Air Sampling unit.

CLOSING COMMENTS

Subject to any state of fact that would not be revealed based upon the initial environmental audit, this document fulfills requirements for phased reporting pursuant to EPA policy statement of November 8, 1985, "Environmental Auditing Policy Statement".

Inasmuch as this report is intended to help determine the "environmental risks" with this property, C.H.E.S. Consultants, Incorporated can only recommend procedural steps necessary to minimize that risk. It is the opinion of C.H.E.S. Consultants, Incorporated that further investigation of this site should take place to fully characterize the status of this site. Should it be deemed necessary to enact "sampling and cleanup procedures", C.H.E.S. Consultants, Incorporated can provide the necessary disciplines to conduct such activities.

Activities will begin as soon as possible. Costs for the assessment CAN ONLY BE ESTIMATED ON A TIME AND MATERIALS BASIS, (see attached project costs;well drilling estimates, expenses thus far). C.H.E.S. Consultants, Incor-

porated, will continue to inform you of these costs. Should a problem area be found additional funding may be required to adequately define subsurface conditions.

Submitted by C.H.E.S. Consultants, Incorporated

John C. Wallace, Paralegal for Consultants

Michael Furfaro, Environmental Consultant

May 12, 1989

ATTACHMENTS:

A) PROPOSALS FOR MONITOR WELL INSTALLATION;

1) BOWSER & MORNER

2) COOK, comparative pricing schedule.

B) ASSESSOR RECORDS

C) MAPS

1) PROPOSED PLACEMENT

2) OVERHEADS

D) WELL LOGS (DNR)

E) TIME LOG FOR PROJECT

F) PRICING SCHEDULE, C.H.E.S. Consultants, Incorporated

G) ACETONE MSDS

May 12, 1989

BOWSER MORNER

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122 S. St. Clair St. • P.O. Box 838 • Toledo, OH 43696-0838 • 419/255-8200

May 5, 1989

C.H.E.S. Consultants
716 Lincolnway West
Osceola, Indiana 46561

Attention: Mr. John Wallace

RE: Soil Sampling and Well Installations, ANCO Products
2500 South 17th Street
Elkhart, Indiana

Gentlemen:

Enclosed is a proposal for the soil sampling and well installations for the above-referenced site. We believe this will cover the various aspects of the work you propose to have BOWSER-MORNER perform.

As you indicated, your firm will prepare a necessary site safety plan and perform necessary monitoring of the work areas. Your firm will have the responsibility for determining when additional personal protective measures are necessary. Our field crew will have the necessary clothing and equipment to provide Level C protection.

If we are informed by May 10, 1989, that we may proceed with this work, we can begin this project on May 15, 1989.

The proposal is a budget estimate and the work will be performed on a time-and-materials basis. We find this to be the best method of working when the exact work scope cannot be determined beforehand.

We thank you for your inquiry, and look forward to working on this project. Please contact the undersigned if you have any questions.

Respectfully submitted,

BOWSER-MORNER ASSOCIATES, INC.

H. Neal Troy

H. Neal Troy
Senior Environmental Consultant

HNT:jl(11)
Encls.

BOWSER-MORNER, INC.
Testing Division

BOWSER-MORNER ASSOCIATES, INC.
Engineering Division

Other Locations:
420 Davis Ave. • P.O. Box 51 • Dayton, OH 45401-0051 • 513/253-8805
169 E. Reynolds Rd. • P.O. Box 24289 • Lexington, KY 40524-4289 • 606/273-9111

BOWSER MORNER

FOUNDED 1911

122 S. St. Clair St. • P.O. Box 838 • Toledo, OH 43696-0838 • 419/255-8200

May 5, 1989

ANCO Products, Inc.
2500 South 17th Street
Elkhart, Indiana 46517

Attention: Mr. Howard Tomlinson

RE: Soil Sampling and Well Installations, Elkhart, Indiana
Quote No. T-2117

Gentlemen:

Pursuant to the request of C.H.E.S. Consultants, BOWSER-MORNER has prepared a cost estimate for the installation of wells and performing soil sampling at your property in Elkhart, Indiana.

The estimate covers the installation of five wells. The wells will be 2 inch I.D., and will be constructed with PVC piping, 10-foot PVC screen, and a 5-foot steel guard pipe with locking cap and lock. The approximate depth of the wells will be 20 to 25 feet. BOWSER-MORNER will develop the wells, but any soil sampling, other than that necessary for logging the well borings, will be at the direction of C.H.E.S. and at a cost set forth in the attached estimate. The total estimated cost involves only the five wells.

To indicate that you accept the scope-of-work, the cost, the attached GENERAL TERMS AND CONDITIONS presented with this proposal, and you authorize us to proceed with this project, please indicate with your signature in the space provided below. Note that before BOWSER-MORNER can deliver our final report, a signed copy of this proposal must be returned to us.

BOWSER-MORNER, INC.
Testing Division

BOWSER-MORNER ASSOCIATES, INC.
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If you have any questions, please contact the undersigned.

Respectfully submitted,

BOWSER-MORNER ASSOCIATES, INC.

H. Neal Troy

H. Neal Troy
Senior Environmental Consultant

HNT:jl(11)
Encls.
ACCEPT:

By: _____

Title: _____

Date: _____

BOWSER MORNER

UNIT PRICE FEE SCHEDULE

ANCO PRODUCTS, INC.
ELKHART, INDIANA
Quote No. T-2117

Item	Estimated Quantity	Unit Price	Extension
Mobilization/demobilization	1	$700.00	$ 700.00
Subsistence of crew	2 days	$120/day	$ 240.00
Hollow stem auger soil boring: 4 1/4" I.D. *	112.5	$10.75/ft.	$1,210.00
Split spoon samples *	23	$15.00 ea.	$ 345.00
2" PVC well installation Labor and materials	112.5	$18.00/ft.	$2,025.00
Steel guard pipe (6"x5') with locking cap and lock	5	$160.00 ea.	$ 800.00
Decontamination time *	2.5 hrs.	$100.00/hr.	$ 250.00
Well development *	2.5 hrs.	$100.00/hr.	$ 250.00
Decon trailer	2 days	$125.00/day	$ 250.00
Access time	0	$100.00/hr.	--
Stand-by time	0	$100.00/hr.	--
ESTIMATED TOTAL			$6,070.00

3 Days portal to portal

* 25% surcharge if Level C protection is used.

$30/day/man equipment charge for Level C. protection

Hollow stem auger soil boring 3 1/4" I.D., $9.75/foot

Grouting of soil borings $7.00/foot

BOWSER MORNER

GENERAL TERMS AND CONDITIONS

THESE SERVICES ARE SUBJECT TO THE FOLLOWING CONDITIONS:

1. Payment. The CLIENT shall pay BOWSER-MORNER within thirty (30) days after receipt of each approved invoice.

2. Standard Performance. In performing the professional services specified herein, BOWSER-MORNER, its officers, agents and employees, will use that degree of care and skill ordinarily exercised under similar circumstances by an independent testing laboratory or consulting engineer in performing such services. THE WARRANTY STATED HEREIN IS EXPRESSLY IN LIEU OF ANY OTHER WARRANTIES, EXPRESSED OR IMPLIED, INCLUDING ANY IMPLIED WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, AND IS ALSO EXPRESSLY IN LIEU OF ANY OTHER OBLIGATIONS OR LIABILITY ON THE PART OF BOWSER-MORNER, WHETHER IN CONTRACT, TORT OR OTHERWISE. BOWSER-MORNER NEITHER ASSUMES NOR HAS AUTHORIZED ANY PERSON TO ASSUME FOR IT ANY OTHER WARRANTY OR LIABILITY IN CONNECTION WITH THE SERVICES AND THE REPORTS WHICH IT RENDERS HEREUNDER.

3. Additional Services. BOWSER-MORNER shall provide additional services under this Contract as requested by the CLIENT and shall invoice the CLIENT for these additional services. It is understood that the scope-of-work defined in this Contract is based on the information provided by the CLIENT. If unexpected site conditions are encountered or if additional services are required beyond the defined scope-of-work, BOWSER-MORNER shall make reasonable effort to contact the CLIENT when a change in the scope-of-work is necessary. Work will progress when authorized by the CLIENT or his authorized representative. The CLIENT, by agreeing to the change, also recognizes that the estimated costs or quoted figure may also change.

4. Job Site.

(a) CLIENT shall furnish or cause to be furnished to BOWSER-MORNER all documents and information known to OWNER that relate to the identity, location, quantity, nature or characteristics of any hazardous waste at, on or under the site. In addition, OWNER will furnish or cause to be furnished such other reports, data, studies, plans, specifications, documents and other information on surface and subsurface site conditions required by BOWSER-MORNER for proper performance of its services. BOWSER-MORNER shall be entitled to rely upon CLIENT-provided documents and information in performing the services required under this Contract; however, BOWSER-MORNER assumes no responsibility or liability for their accuracy or completeness. CLIENT-provided documents will remain the property of the CLIENT.

(b) BOWSER-MORNER shall be responsible only for its activities and the activities of its employees on the job site.

(c) BOWSER-MORNER will not direct, supervise or control the work of contractors their subcontractors, nor will it accept liability for the actions of the contractors or their subcontractors.

(d) BOWSER-MORNER shall not be responsible for job site safety.

(e) BOWSER-MORNER shall not be liable for damage or injury arising from damage to subterranean structures (pipes, tanks, telephone cables, etc.) which are not called to BOWSER-MORNER's attention in writing and correctly shown on plans furnished.

5. Disposal of Contaminated Material. It is understood and agreed that BOWSER-MORNER is not, and has not responsibility as a handler, generator, operator, treator or storer, transporter or disposer of hazardous or toxic substances found or identified at a site. It is understood that CLIENT hereby instructs BOWSER-MORNER to make arrangements, as CLIENT's agent, for appropriate transportation and disposal of samples with appropriate licensed parties. CLIENT agrees to remunerate BOWSER-MORNER for services rendered and costs incurred for transportation and disposal of contaminated samples.

6. Limit of Liability. If BOWSER-MORNER shall be found liable for any direct loss or damage attributable to breach of its warranty hereunder, or for any breach of contract, expressed or implied, or for any degree of negligence, whether by malfeasance, misfeasance, or nonfeasance, and whether active or passive, then, in such event, under all circumstances, BOWSER-MORNER's liability shall be limited to payment of any direct damages in an amount not to exceed the contract price hereunder. In no event shall BOWSER-MORNER be liable for any special, indirect, punitive, consequential or economic damages, including but not limited to damages for loss of use, loss of profits, loss of investment, or otherwise resulting from the services and reports it renders hereunder.

7. Waiver. CLIENT expressly waives any other right of recovery and agrees that any payment by BOWSER-MORNER hereunder shall be the sole and exclusive remedy of CLIENT and others.

8. Release. Except as set forth at paragraph 6 hereunder, CLIENT hereby releases BOWSER-MORNER, its employees, agents and successors, from direct or indirect liability based on any other rights of recovery that it may have.

9. Delay in Performance. BOWSER-MORNER shall diligently perform its work under this Contract within the time limits specified; however, BOWSER-MORNER shall not be liable for failure or delay in performance of its services due to acts of God, labor disputes or shortages, fire, flood or other casualty, governmental regulations or requirements, shortages or failure of raw materials, supplies, fuel, power or transportation, breakdown of equipment, or any causes beyond reasonable control.

10. Objections to Service. Claims for CLIENT must be made promptly and BOWSER-MORNER given an opportunity to investigate.

11. Reports. BOWSER-MORNER shall consider all reports to be the confidential property of CLIENT and distribute reports only to those persons, organizations or agencies specifically designated in writing by the CLIENT or their authorized representative.

12. Insurance. BOWSER-MORNER shall furnish and keep in full force and effect at all times during the term of this Contract Workers' Compensation insurance covering all employees of BOWSER-MORNER, its agents and its consultants.

BOWSER MORNER

BOWSER MORNER

FOUNDED 1911

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May 5, 1989

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Quote No. T-2117

Gentlemen:

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The estimate covers the installation of five wells. The wells will be 2 inch I.D., and will be constructed with PVC piping, 10-foot PVC screen, and a 5-foot steel guard pipe with locking cap and lock. The approximate depth of the wells will be 20 to 25 feet. BOWSER-MORNER will develop the wells, but any soil sampling, other than that necessary for logging the well borings, will be at the direction of C.H.E.S. and at a cost set forth in the attached estimate. The total estimated cost involves only the five wells.

To indicate that you accept the scope-of-work, the cost, the attached GENERAL TERMS AND CONDITIONS presented with this proposal, and you authorize us to proceed with this project, please indicate with your signature in the space provided below. Note that before BOWSER-MORNER can deliver our final report, a signed copy of this proposal must be returned to us.

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If you have any questions, please contact the undersigned.

Respectfully submitted,

BOWSER-MORNER ASSOCIATES, INC.

H. Neal Troy

H. Neal Troy
Senior Environmental Consultant

HNT:jl(11)
Encls.
ACCEPT:

By: _____

Title: _____

Date: _____

BOWSER MORNER

UNIT PRICE FEE SCHEDULE

ANCO PRODUCTS, INC.
ELKHART, INDIANA
Quote No. T-2117

Item	Estimated Quantity	Unit Price	Extension
Mobilization/demobilization	1	$700.00	$ 700.00
Subsistence of crew	2 days	$120/day	$ 240.00
Hollow stem auger soil boring: 4 1/4" I.D. *	112.5	$10.75/ft.	$1,210.00
Split spoon samples *	23	$15.00 ea.	$ 345.00
2" PVC well installation Labor and materials	112.5	$18.00/ft.	$2,025.00
Steel guard pipe (6"x5') with locking cap and lock	5	$160.00 ea.	$ 800.00
Decontamination time *	2.5 hrs.	$100.00/hr.	$ 250.00
Well development *	2.5 hrs.	$100.00/hr.	$ 250.00
Decon trailer	2 days	$125.00/day	$ 250.00
Access time	0	$100.00/hr.	--
Stand-by time	0	$100.00/hr.	--
ESTIMATED TOTAL			$6,070.00

3 Days portal to portal

* 25% surcharge if Level C protection is used.

$30/day/man equipment charge for Level C. protection

Hollow stem auger soil boring 3 1/4" I.D., $9.75/foot

Grouting of soil borings $7.00/foot

BOWSER MORNER

COOK DRILLING CO.

Bus: 1119 South Bend Avenue
South Bend, Indiana 46617
(219) 233-6820

Res: 2410 Weaver Road
Niles, MI 49120
(616) 684-6269

PRICE LIST - October 1988

1. Conventional Drilling with standard penetration tests, hollow stem or flight augers:
   - 0.0 - 30.0'.....6.00 ft.
   - 0.0 - 50.0'.....6.25 ft.
   - 0.0 - 65.0'.....6.85 ft.
   - 0.0 - 80.0'.....7.90 ft.
   - 0.0 - 100.0'.....8.75 ft.
   - 100.0 & over.....9.50 ft.

   Additional sampling after 15' other than 5' intervals: $15.00 per sample.

2. No additional charge for wash boring. For rotary drilling with fluids add to the above charges: .....1.25 ft.

3. Mobilization. A round trip charge for drill rig and support vehicle from shop to shop.....1.50 mi.
   Additional vehicle (for hauling large quantities of pipe, backfill materials, extra water tank, etc.) Client will be asked to approve before proceeding.....
   .....1.00 mi.

4. Crew subsistence. (Per diem) over 75 miles from South Bend, Indiana.
   Per two man crew.....80.00 day
   Per three man crew.....100.00 day

5. Rig time (also standby or delay time).....90.00 hr.

6. Auger borings or probes.....3.50 ft.

7. Concrete coring. Time begins with loading of core tools and accessories; time ends with unloading.....60.00 hr.

8. Shelby tube sampling (2" & 3" - includes tube and wax sealant)
   - 0.0 - 30.0'.....40.00 ea.
   - 30.0 - 50.0'.....46.00 ea.
   - 50.0 - 65.0'.....53.00 ea.
   - 65.0 - 80.0.....60.00 ea.
   - 80.0 - 100.0'.....68.00 ea.
   - 100.0 & over.....80.00 ea.

9. OBSERVATION WELLS - Installation and Grouting
   Wells installed without special backfilling requirements such as cement or grout will be charged on a time and materials basis.
   Wells backfilled using tremie pipe with cement or cement/bentonite mix:
   - 0.0 - 30.0'.....125.00 ea.
   - 30.0 - 50.0'.....175.00 ea.
   - 50.0 - 80.0'.....225.00 ea.
   - 80.0 - 100.0'.....300.00 ea.
   - 100.0' & over.....time & materials

10. Protective cover installation: 4".....115.00 ea.
    6".....150.00 ea.

11. Steam cleaning (augers, samplers, drill rod, etc.)..... 175.00 per hole

COOK DRILLING CO.

Bus: 1119 South Bend Avenue
South Bend, Indiana 46617
(219) 233-6820

Res: 2410 Weaver Road
Niles, MI 49120
(616) 684-6269

October, 1988

The following prices are for 2" PVC observation wells with 10' .006 - .010 inch slot screens. Other items that these prices includes are as follows:

a) 2" PVC riser extending 2' above ground surface

b) 4" protective casing with 2'X 2' concrete pad installed

c) 2" PVC plug and cap

d) Well grouting (from top of screen to surface using bentonite and cement mix)

e) Well development (when static water depth permits using Moyno 3L6 pump or equivalent; 30 min.)

When total depths of wells fall between the footage breakdowns listed below, the next highter price will be charged. (Example: 27.5' well cost: 600.00)

Well depth	3' sampling intervals	Continous sampling
0-15'	390.00	390.00
20'	430.00	450.00
25'	500.00	525.00
30'	575.00	600.00
35'	630.00	690.00
40'	725.00	790.00
45'	785.00	925.00
50'	835.00	1000.00
55'	1000.00	1175.00
60'	1075.00	1275.00
65'	1150.00	1375.00
70'	1225.00	1450.00

In the event that sand packs are needed, the well price will reflect the time and materials needed for installation.

Wells in excess of 70' will be quoted.

COOK DRILLING CO.

Bus: 1119 South Bend Avenue
South Bend, Indiana 46617
(219) 233-6820

Res: 2410 Weaver Road
Niles, MI 49120
(616) 684-6269

SOIL BORING AND GROUTING PRICE LIST - OCTOBER, 1988

Depth	3' sampling no grout	Grouted	Continous sampling no grout	Grouted
15'	82.50	207.50	90.00	215.00
20'	110.00	235.00	120.00	245.00
25'	137.50	262.50	187.50	312.50
30'	165.00	290.00	232.50	357.00
35'	218.75	368.75	300.00	450.00
40'	250.00	400.00	362.00	512.00
45'	281.25	456.00	490.00	639.00
50'	312.50	487.50	552.50	702.50
55'	385.00	560.00	664.75	839.75
60'	420.00	610.00	731.00	906.00
65'	455.00	650.00	830.00	1005.00
70'	525.00	725.00	880.00	1100.00
75'	600.00	825.00	1040.00	1265.00
80'	675.00	900.00	1100.00	1325.00
85'	750.00	1050.00	1240.00	1490.00
90'	810.00	1110.00	1360.00	1650.00

This indenture witnesseth that DIETZGEN CORPORATION, a Delaware corporation

of COOK *County in the State of* ILLINOIS

Conveys and warrants to LEE R. ANDERSON
2366 Rose Place
St. Paul, Minnesota 55113

of RAMSEY *County in the State of* MINNESOTA

for and in consideration of One Dollar ($1.00) and other valuable consideration *the receipt whereof is hereby acknowledged, the following Real Estate in* Elkhart *County in the State of Indiana, to wit:*

A part of the northeast quarter (NE 1/4) of Section eighteen (18), Township Thirty-seven (37) North, Range five (5) East, in Concord Township, Elkhart County, Indiana, more particularly described as follows:

Beginning at the southwest corner of said quarter section; thence northwardly along the west line of said quarter section, one thousand two hundred ninety-four and three tenths (1294.3) feet to a point that is thirty (30) feet south of the north line of the south half (S 1/2) of said quarter section; thence eastwardly parallel with the north line of said South half (S 1/2) of said quarter section, eight hundred twenty and three hundredths (820.03) feet; thence southwardly parallel with the west line of said quarter section, one thousand two hundred ninety-four and forty-two hundredths (1294.42) feet to the south line of said quarter section; thence westwardly along the south line of said quarter section eight hundred twenty and three hundredths (820.03) feet to the place of beginning; containing approximately twenty-four and ninety-three hundredths (24.93) acres of land.

Excepting the south thirty (30) feet which is used as a part of Hively Avenue and excepting the west thirty (30) feet which is used as a part of Seventeenth Street.

Subject to the easement of the New York Central Railroad (now Penn-Central Railroad).

Subject to all taxes, assessments and restrictions of record, if any.

The Grantor herein hereby certifies that it is the successor by name change to Eugene Dietzgen Co., a Delaware corporation and that Eugene Dietzgen Co., and Dietzgen Corporation are one and the same entity.

The Grantor herein hereby certifies under oath that no Indiana Gross Income Tax is due or payable as a result of this conveyance and transaction.

State of Indiana, Elkhart County, ss:

Before me, the undersigned, a Notary Public in and for said County and State, this 20 *day of* June 1977 *personally appeared:*

DIETZGEN CORPORATION, a Delaware corporation, by WILLIAM C. PETERSON its President and R. A. GLAB, its Secretary and who for and on behalf of said corporation,

acknowledged the execution of the foregoing deed. In witness whereof, I have hereunto subscribed my name and affixed my official seal. My commission expires Sept. 18 1979

Geoffrey K Church *Notary Public*

Dated this 20 **Day of** June 19 77

DIETZGEN CORPORATION

BY _____ *Seal*
William C. Peterson, President

_____ *Seal*

Attest: _____ *Seal*
R. A. Glab, Secretary

_____ *Seal*

_____ *Seal*

_____ *Seal*

Prepared by the law office of Slabaugh, Cosentino & Walker by Michael A. Cosentino
Member of Elkhart County Indiana Bar Association

MAIL TO:

COPYRIGHT MAY 1963, ST. JOSEPH COUNTY INDIANA BAR ASSOCIATION

FILED FOR RECORD
Jul 6 2 35 PM '77
Maynard E. Kauffman
ELKHART COUNTY RECORDER
633126

Legal Description

Pt NE ex 1.72A ex 5.34 A
Sec. 18 7.0 A

T.D.	Twp.	Sec. No.	Block	Parcel
26	06	18	251	020

251-003

Owner's Name TO 7-6-77 - 24	Property Address	Date	Transfer No.
Anderson, Lee			

5-19-56-7 373A-16607

Pt NE ex 4.35A ex .17A ex 14.06A
Sec 18 5.91A

CENTRAL WAREHOUSE CORP., IND
2500 S. 17th ST. CORP.
ELKHART, IND.

DATE	TRANSFER NUMBER	25 06 18 251 001
5-7-69	Ord. 2358	Gross Conc. Sup. 5-175
7-15-75	8175	Dietzgen Corporation
7-6-77	24	Lee A. Anderson
~~Corrected~~	#2145	Jan. 1, '80
Agreement		per School Districts

POSTING DATE	REFERENCE	A-L	LAND/LOT	IMPROVEMENTS	GROSS VALUATION	EXEMPTIONS KIND	EXEMPTIONS AMOUNT	NET VALUATION	½ TAX
3-1-70		A	7870	143930	151800	m	1000	150800	
3-1-71		A	7870	143930	151800	m	1000	150800	
3-1-72		A	7870	~~158770~~ 146620	~~166640~~ 154490	m	1000	~~165640~~ 153490	Corr. to 166640 Was assess
3-1-73		A	7870	146620	154490	m	1000	153490	
3-1-74		A	7870	146620	154490	m	1000	153490	
3-1-75		A	7870	146620	154490	m	1000	153490	
3-1-76	OVER	A	7870	146620	154490			154490	
3-1-76	D.T. Assm'T	A	14980	146620	161400			161400	
3-1-76	B/R	A	7870	146620	154490			154490	OVER

FORM T-1 APPROVED BY STATE BOARD OF ACCOUNTS FOR ELKHART COUNTY - 1961

5-19-56-7 373A-16608

Pt S½ NE¼ Sec 18
561.3'S N Line S½ NE¼
160'x468.78' 1.72A

CENTRAL WAREHOUSE CORP.,
2500 S. 17th ST.
ELKHART, IND.

DATE	TRANSFER NUMBER	26 25 06 18 251 002
5-7-69	Ord. 2358	Gross Conc. Sup. 5-175-1
7-15-75	8175	Dietzgen Corporation
7-6-77	24	Lee A. Anderson
~~Corrected~~	#2145	Jan. 1, '80
Agreement		per School Districts

POSTING DATE	REFERENCE	A-L	LAND/LOT	IMPROVEMENTS	GROSS VALUATION	EXEMPTIONS KIND	EXEMPTIONS AMOUNT	NET VALUATION	½ TAX
3-1-70		A	860		860			860	
3-1-76	D.T. Assm'T	A	2870		2870			2870	
3-1-76	B/R	A	860		860			860	
3-1-76	S/B	A	1290		1290			1290	#118 5-26-

FORM T-1 APPROVED BY STATE BOARD OF ACCOUNTS FOR ELKHART COUNTY 1961

.o 06 18 251 ~~025~~ 020

ELKHART COUNTY CONCORD TOWNSHIP ELK. CITY CORPORATION

DISTRICT | SECTION & PLAT | ROUTING NUMBER | CARD NUMBER 01 OF 01

I

PROPERTY CLASS 530

5-19-56-7 373A-16609 OWNERSHIP

PROPERTY ADDRESS

2500 S. 17th St. 46517

MEMORANDUM

5-15-80 Proceed from #1134/139 to ex-
tend improvement. Improvements to ex
tend already assessed on Code #25-06-18-251-001.

1-1-80 Agreement per School Districts.
Taxing Unit changed per Annexation #2145
Split 7/20/87 # 6564
Anderson Lee
2366 Rose Place St Paul Minn. 55113

~~In NE ex 1.72A Sec 18 12.34A~~

In NE ex 1.72A ex 5.34A Sec 18 7.00A

DIETZGEN, EUGENE CO., A DEL CORP
2500 SOUTH ~~17th ST.~~ % CENTRAL
ELKHART, IND. (WAREHOUSE CORP.
46514

TRANSFER OF OWNERSHIP		DATE
~~Anderson, Lee R.~~	#9024	7/6/77
~~2366 Rose Place Street, St. Paul Minn. 55113~~		
Evind Corporation	#6564	7-20-87
~~Robert L Heering United Parcel Service~~		
~~51 Weaver St, Greenwich Office Park 5~~		
~~Greenwich, Connecticut 06830~~		

PT PLANT PT UO. UNO.

VALUATION RECORD

ASSESSMENT YEAR		1978	19 77	19 79	19 80	19	19	19	19
REASON FOR CHANGE		REVALUATION	Chan Ty	Correction By #133	P				
TRUE CASH VALUE	LAND	51540	35540	35,540	33600				
	IMPROVEMENTS	872700	872700	—	—				
	TOTAL	924240	908240	35,540	33600				
ASSESSED VALUE	LAND	17180	11850	11,850	11200				
	IMPROVEMENTS	290880	290900		—				
	TOTAL	308060	302750	11,850	11200				

LAND DATA AND COMPUTATIONS

TOPOGRAPHY		PUBLIC UTILITIES	
LEVEL	(	WATER	
HIGH		SEWER	
LOW		GAS	✓
ROLLING		ELECTRICITY	✓
SWAMPY		ALL	
STREET OR ROAD		NEIGHBORHOOD	
PAVED		IMPROVING	
UNPAVED		STATIC	/
PROPOSED		DECLINING	
SIDEWALK			
ALLEY		BLIGHTED	

INFLUENCE FACTOR

1 CORNER INFLUENCE
2 ALLEY INFLUENCE
3 TOPOGRAPHY
4 UNDER IMPROVED
5 EXCESS FRONTAGE
6 SHAPE OR SIZE
7 MISIMPROVEMENT
8 RESTRICTIONS
9 VIEW

LAND TYPE		ACTUAL FRONTAGE	EFFECTIVE FRONTAGE	EFFECTIVE DEPTH	DEPTH FACTOR	BASE RATE	ADJUSTED RATE	EXTENDED VALUE	INFLUENCE FACTOR	TRUE CASH VALUE
F FRONT LOT		•							[ ] %	
R REAR LOT		•							[ ] %	
1 PRIMARY IND/COMM SITE		•							[ ] %	
2 SECONDARY IND/COMM SITE									[ ] %	
3 UNDEVELOPED				SQ. FT.						
4 OPEN TILLABLE										
5 OPEN NON-TILLABLE		SOIL I.D.	ACREAGE		FACTOR					
6 WOOD/WASTELAND										
61 PUBLIC ROAD										
7 HOME SITE	F 1		2.00		~~8000~~			~~16000~~	[ ] %	~~16000~~
8	2		3.00		~~8000~~			~~24000~~	04 [ ] 40 %	~~14400~~
9	3		~~7.34~~		~~8000~~			~~58720~~	04 [ ] 64 %	~~21140~~
0			~~12.34~~		~~8000~~			~~98720~~	04 [ ] 64 %	~~35540~~
			7.00			8M	8M	56000	[ ] 40 %	33600
									[ ] %	
									[ ] %	
									[ ] %	
									[ ] %	
									[ ] %	336(00)
									[ ] %	~~3554~~

TOTAL ACREAGE | TOTAL TRUE CASH LAND VALUE ~~37554~~

1 AGRICULTURAL
00 vacant land
01 cash grain/gen. farm
02 livestock o/t 03 & 04
03 dairy farms
04 poultry farms
05 fruit & nut farms
06 vegetable farms
07 tobacco farms
08 nurseries
09 greenhouses
20 timber
99 other agricultural use

2 MINERAL

3 INDUSTRIAL
00 vacant l.
10 food & drink
20 foundries & heavy mfg.
30 medium mfg. & assemb
40 light mfg & assembly
50 Ind. warehouses
60 Ind. truck terminals
70 small shops
80 mines & quarries
90 grain elevators
99 other Ind. structures

4 COMMERCIAL
00 vacant land
01 04 19 family apts.
02 20-39 family apts.
03 40 or more families
10 motels/tourist cabins
11 hotels
12 nursing hms/hospitals
15 mobile home parks
16 Comm. camp grounds
19 other Comm. housing
20 small det. retl (-10000)
21 supermarkets
22 discnt/jr. dept. stores
24 full line dept. stores
25 neighborhd. shop. cent.
26 community shop. cente
27 regional shop. center
29 other retail struct.
30 rest., cafe and/or bar
35 drive-in restaurant
39 other food svc. struct.
40 dry clean plant/laundry
41 funeral homes
42 med. clinics & offices
44 full service banks
45 savings and loans
47 office bldg--1 & 2 story
48 office o/t 47—walk up
49 office o/t 47—elevator
52 auto service station
53 car washes
54 auto sales & service
55 Comm. garage
56 parking lot or struct.
60 theaters
61 drive in theaters
62 golf range/min. course
63 golf courses
64 bowling alleys
65 lodge halls/amuse. pks
80 Comm. warehouses
82 Comm. truck terminals
90 marine svc. facilities
96 marinas (small boats)
99 other Comm. structures

5 RESIDENTIAL
0 vacant land
1 one-family dwelling
2 two-family dwelling
3 three-family dwelling
4 house trailer (real)
5 condominium unit
0 platted lot
1 unplatted 0-09.99 acs
2 unplatted 10-19.99 acs
3 unplatted 20-29.99 acs
4 unplatted 30-39.99 acs
5 unplatted 40+
99 other res. structures

IMPROVEMENT DATA AND COMPUTATIONS

RESIDENTIAL BUILDINGS

OCCUPANCY	STORY HEIGHT	ATTIC	BSMT	CRAWL
SINGLE FAMILY	1	NONE	NONE	
DUPLEX	1-1/2	UNFINISHED		
TRIPLEX	2	FINISHED		
4 FAMILY	BI-LEVEL			
	TRI-LEVEL			
ROW HOUSE				

CONSTRUCTION	BASE AREA	FLOOR LEVEL	FIN. LIVING AREA	VALUE
FRAME OR ALUM.				
STUCCO				
TILE				
CONCRETE BLOCK				
METAL				
CONCRETE				
BRICK		ATTIC %	%	
STONE				
FRAME W/MAS.		BSMT CRAWL		

ROOFING	
ASPHALT SHINGLES	
TILE OR TILE	
TAL	

DOORS	B	1	UP
TH			
B			
& JOISTS			
WOOD OR FIR			
QUET			
E			
RPET			
INISHED			

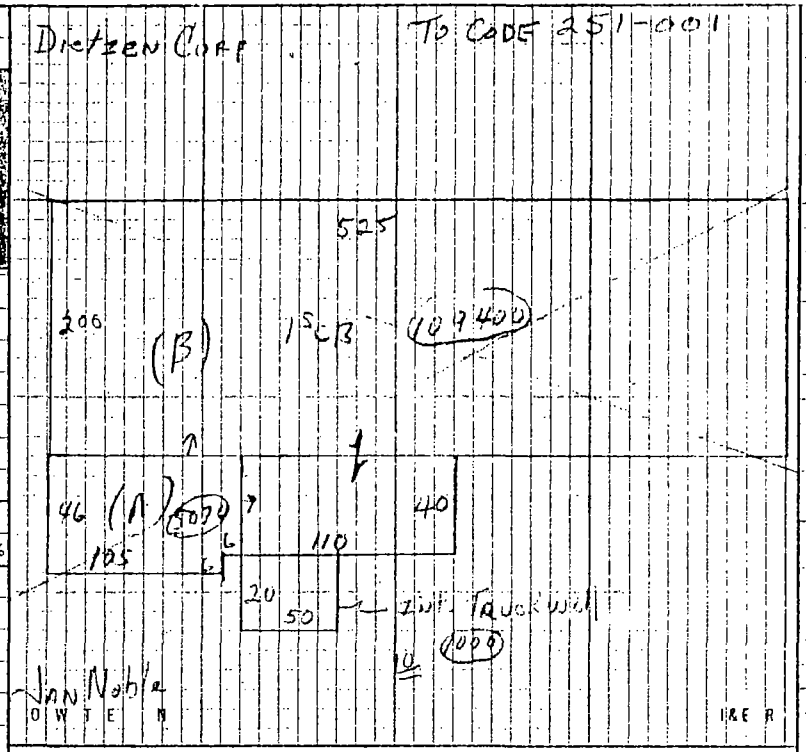
FIN. FINISH	B	1	A
TR OR D.W.			
VELING			
ERBOARD			
INISHED			

COMMODATIONS	
MBER OF ROOMS	
DROOMS	
MILY ROOM	
RMAL DINING ROOM	
C. ROOM TYPE	
C. ROOM SIZE	
EPLACE STACKS	
EPLACE OPENINGS	
ATING BASE	
HEATING	
NTRAL WARM AIR	
W. OR STEAM	
NTRAL AIR COND.	
UMBING BASE	
PLUMBING	
TER ONLY	
LL BATHS	
LF BATHS	
C. & LAVS.	

TOTAL BASE	±	
ROW-TYPE ADJUSTMENT		%
SUB-TOTAL		
UNFINISHED INTERIOR		
EXTRA LIVING UNITS		
REC. ROOM		
FIREPLACE		
NO HEATING		
AIR CONDITIONING		
NO PLUMBING		
BASE PLBG. [−]		
BASE PLBG. [+]		
SUB-TOTAL, ONE UNIT		
SUB-TOTAL, ___ UNITS		
GARAGES & CARPORTS		
EXTERIOR FEATURES		
SUB-TOTAL		
GRADE & DESIGN FACTOR [ ]		%
REPRODUCTION COST		
COST FACTOR		
REPRODUCTION COST		

REMODELING & MODERNIZATION

EXTERIOR	
INTERIOR	
KITCHEN	
BATH FACILITIES	
PLUMBING SYSTEM	
HEATING SYSTEM	
ELECTRICAL SYSTEM	
TENSIONS	



SPECIAL FEATURES FOR COMMERCIAL/INDUSTRIAL BUILDINGS

QTY	ITEM DESCRIPTION	VALUE
	Paint Hse Concrete in Place	
	TOTAL (TO BE CARRIED TO PRICING LADDER) →	

COMMERCIAL/INDUSTRIAL BUILDING

WALLS		ROOFING	
BRICK	A	BUILT UP	B
STONE		METAL	
CONCRETE		SLATE/TILE	
WO/MTL.		SHINGLE	
CB/TILE	B		
		INSUL.	

FRAMING	B	1	2	UP
WOOD JOIST				
FIRE RESISTNT		A		
FIRE PROOF				
FLOORS				
CONCRETE		B		
WOOD				
TILE Comp		A		
FINISH TYPE				
UNFINISHED		B		
SEMIFINISHED				
FINISHED OPEN				
FIN. DIVIDED		A		
USE				
STORE				
OFFICE		A		
APARTMENT				
Factory		B		
VACANT				
ABANDONED				
HEATING & A.C.				
NO HEATING				
CEN. WARM AIR		A		
H.W. OR STEAM				
UNIT HEATING		B		
CENTRAL AIR		A		
PKG/UNIT AIR				
PLUMBING				
FULL BATHS				
HALF BATHS				
OTHER FIXT.		25		
SPRINKLER				

	A	B
PRICING KEY	[illegible]	[illegible]
S.F. AREA	5070	[illegible]
EFF. PERIMETER	[illegible] L/F	[illegible] L/F
PERIM. AREA RATIO	[illegible]	[illegible]
NUMBER OF UNITS		
AVE. UNIT SIZE		
FLOOR	HGT. / RATE	HGT. / RATE
Fdng		
BSMT.		
FIRST	19.70	20.10 / 3.53
SECOND		
	Add 2.150	
W.U.	[illegible]	[illegible]
BASE PRICE	19.70	10.15
B.P.A. %	110 %	[illegible] %
SUB. TOTAL	[illegible]	[illegible]
UNIT FINISH		
INTERIOR FINISH		
DIV. WALLS		
LIGHTING		
HEATING & A.C.	[illegible]	
SPRINKLER		
S.F./C.F. PRICE	[illegible]	[illegible]
AREA CUBAGE	[illegible]	[illegible]
SUB-TOTAL	109500	[illegible]
PLUMBING	[illegible]	
SPECIAL FEATURES		
EXTERIOR FEAT.		[illegible]
TOTAL BASE	[illegible]	[illegible]
G/D FACTOR %	100	100
REPRO. COST	123500	1,144,200
COST FACTOR	—	—
REPRO. COST	123500	1,144,200

SUMMARY OF IMPROVEMENTS

I.D.	USE	STORY HEIGHT	CONST.	GRADE	YEAR CONST.	YEAR REMOD.	COND.	SIZE	AREA	RATE	REPRODUCTION COST	ACCRUED DEPRECIATION NORM.	OBSOL.	TOTAL	TRUE CASH VALUE
	DWELLING	—	—	—				—	—	—					
	GARAGE														
B	Factory	15	JB		1972		G		109400		1,144,200	20	10	30	800,900
A	Office	15	BR		1972		G		4370		123500	20	30	50	61,800
Asph	Paving		Asph					40,000	50		20,000			50	10,000
														TOTAL TRUE CASH IMPROVEMENT	872700

DATA COLLECTOR/DATE: [illegible] 2-11-77

APPRAISER/DATE: DH 11-14-77

25-06-18-251-003

PROPERTY RECORD

TOWNSHIP OR CORPORATION: CONCORD

TAXING DISTRICT: CONCORD

SECTION OR PLAT: 2-25

ROUTING NUMBER

ADDRESS OF PROPERTY

CLASS OF PROPERTY

CARD NUMBER ___ OF ___

~~5-6-1 57-1754~~
5-19-56-7 373A-16609

In NE ex 1.72A Sec 18 12.34A

~~DIETZGEN, EUGENE CO., A DEL CORP~~
~~2500 SOUTH 17th ST. % CENTRAL~~
~~ELKHART, IND. (WAREHOUSE CORP.~~

RECORD OF OWNERSHIP

	DATE	STAMPS
Anderson, Lee R. 2366 Rose Place, St. Paul, Minnesota 55113	7-6-77	9024

ASSESSMENT RECORD

19 76	LAND	30,85
	BLDGS.	12,150
	TOTAL	43,00
19 77	LAND	700
	BLDGS.	12,150
	TOTAL	19,150
19 78	LAND	10,00
	BLDGS.	12,15
	TOTAL	22,15
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	

LAND VALUE COMPUTATIONS AND SUMMARY

FRONTAGE	DEPTH	UNIT VALUE	DEPTH FACTOR	ACTUAL VALUE	TRUE CASH VALUE	ASSESSED VALUE
LOT DEPRECIATION						
CORNER INFL.						

CLASSIFICATION	NO. OF ACRES	RATE	TRUE CASH VALUE	ASSESSED VALUE
TILLABLE LAND				
TILLABLE LAND (10)				
PASTURE	12.34 @ 7500		92,550	30,850
WOODLAND			1972	
~~WASTELAND~~ Ind'l	1	4000		
	11.34+2.34	~~1500~~	21,010	7000
HOMESITE		1500	36440	12150
TOTAL ACREAGE			57450	19150
TOTAL VALUE LAND			18,510	6160
TOTAL VALUE BUILDINGS				
TOTAL VALUE LAND AND BUILDINGS			18510	6160

MEMORANDA

CBR 76 entry appealed to State 72-77

BUILDING PERMIT RECORD

DATE	NUMBER	AMOUNT	PURPOSE

PROPERTY FACTORS

TOPOGRAPHY		IMPROVEMENTS		STREET OR ROAD		DISTRICT	
LEVEL	✓	CITY WATER		PAVED		IMPROVING	
HIGH		SEWER		SEMI-IMPROVED	✓	STATIC	✓
LOW		GAS		UNIMPROVED		DECLINING	
RO'		ELECTRICITY	✓				
SW		ALL UTILITIES		SIDEWALK		BLIGHTED AREA	

BUILDING RECORD

CONSTRUCTION SPECIFICATIONS

OCCUPANCY

1	2	3
VAC. LOT	DWELLING	OTHER

BASEMENT

1	2	3	4	5
SLAB	CRAWL	PART	HALF	FULL

SIZE

HEATING

1	2	3
NONE	BASE	AIRCON

WARM AIR
HOT WATER/STEAM
FLOOR FURNACE
UNIT HEATERS

WALLS

FRAME/STUCCO
CONCRETE BLOCK
BRICK/STONE
PLATE GLASS FRONT

ROOF

SHINGLE—ASPHALT/ASBESTOS
SLATE/TILE
COMP. ON WD/STL FRAMING
METAL

FLOORS

	B	1	2	3
CONCRETE				
PINE				
HARDWOOD				
TILE				
WOOD FRAMING				
STEEL FRAMING				
REIN. CONCRETE				

INTERIOR FINISH

	B	1	2	3
PLST./DRY WALL				
FIBERBOARD				
UNFINISHED				

NUMBER OF ROOMS

1ST	2ND	3RD
BEDROOMS	FAMILY RM.	

PLUMBING

PLUMBING
STANDARD
BATHROOM
TOILET ROOM
SINK/LAVATORY
WATER CLOSET
WATER HEATER
URINAL
NO PLUMBING

ATTIC

1	2	3	4
NONE	UNFIN.	HALF	FULL

OTHER FEATURES

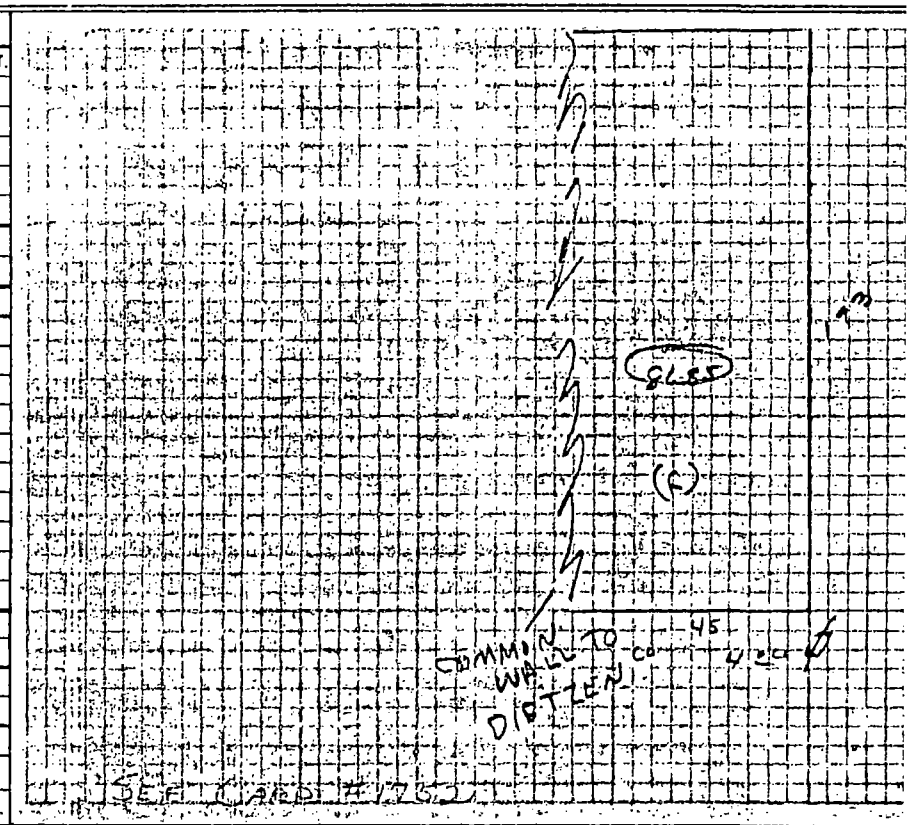
PART MASONRY WALLS
FIREPLACE
MODERN KITCHEN
FINISHED BASEMENT

DWELLING COMPUTATIONS

UNIT	AMOUNT
S.F.	
BASEMENT	
HEATING	
PLUMBING	
ATTIC	
ADDNS. & PCHS.	
SUBTOTAL	
GRADE FACT. %	
OTHER FEATURES	
DESIGN FACT. %	
SUBTOTAL	
COUNTY FACTOR	
REPL. VALUE	

COMMERCIAL COMPUTATIONS

WL. HT.		BLDG. A	BLDG. B	WL. HT.
	B			
	1ST			
	2ND			
	3RD			
SUB TOTAL				
C & GF	%			
BASE PRICE				
B.P.A.	%			
FRONT				
HTG-A.C.				
LIGHTING				
PLUMBING				
PARTITIONS				
FLOORS				
ELEVATOR				
SPRINKLER				
S.F. PRICE				
AREA				
SUBTOTAL				
ADDNS.				
TOTAL BASE				
COUNTY FACTOR				
REPL. VALUE				



BUILDING TYPE	NO.	CONSTRUCTION	SIZE	UNIT VALUE	GRADE	AGE	CDU	REPL. VALUE	DEPR.	TRUE CASH VAL
DWELLING										
~~GARAGE~~	(F)	1 STORY	41x19	40	C	72	G	C.F. 36440	—	36440
LISTED		DATE								
SKETCHED								TOTAL TRUE CASH VALUE OF BUILDINGS		36440

GRADE DENOTES QUALITY OF CONSTRUCTION; A—EXCELLE B—GOOD; C—AVERAGE; D—CHEAP; E—VERY CHEAP
CDU FACTOR REFERS TO THE CONDITION, DESIR TY, AND USEFULNESS OF THE BUILDING

ELKHART COUNTY CONCORD TOWNSHIP ELK. CITY CORPORATION

DISTRICT | SECTION & PLAT | ROUTING NUMBER | CARD NUMBER

I

5-19-56-7 373A-1660 OWNERSHIP

PROPERTY ADDRESS

17th St.

PROPERTY CLASS 3 50

Pt S½ NE¼ Sec 18
561.3'S N Line S½ NE¼
160'x468.78' 1.72A

~~DIETZGEN CORPORATION (A DEL CORP~~
~~2425 N. SHEFFIELD AV.~~
~~CHICAGO, ILL. 60614~~

TRANSFER OF OWNERSHIP

		DATE
Anderson, Lee R.	#9024	7/6/77
2366 Rose Place Street, St. Paul Minn. 55113		

MEMORANDUM

1-1-80 Agreement per School Districts.
Taxing Unit changed per Annexation #2145

PLANT SITE

VALUATION RECORD

ASSESSMENT YEAR		1978-79	19__	19__	19__	19__	19__	19__	19__
REASON FOR CHANGE		REVALUATION							
TRUE CASH VALUE	LAND	13760							
	IMPROVEMENTS	—							
	TOTAL	13760							
ASSESSED VALUE	LAND	4590							
	IMPROVEMENTS	—							
	TOTAL	4590							

LAND DATA AND COMPUTATIONS

TOPOGRAPHY		PUBLIC UTILITIES	
LEVEL	/	WATER	
HIGH		SEWER	
LOW		GAS	/
ROLLING		ELECTRICITY	✓
SWAMPY		ALL	
STREET OR ROAD		NEIGHBORHOOD	
PAVED		IMPROVING	
UNPAVED		STATIC	/
PROPOSED		DECLINING	
SIDEWALK			
ALLEY		BLIGHTED	

INFLUENCE FACTOR

1 CORNER INFLUENCE
2 ALLEY INFLUENCE
3 TOPOGRAPHY
4 UNDER IMPROVED
5 EXCESS FRONTAGE
6 SHAPE OR SIZE
7 MISIMPROVEMENT
8 RESTRICTIONS
9 NEW

LAND TYPE		ACTUAL FRONTAGE	EFFECTIVE FRONTAGE	EFFECTIVE DEPTH	DEPTH FACTOR	BASE RATE	ADJUSTED RATE	EXTENDED VALUE	INFLUENCE FACTOR	TRUE CASH VALUE
F FRONT LOT		•							[ ] %	
R REAR LOT		•							[ ] %	
1 PRIMARY IND/COMM SITE		•							[ ] %	
2 SECONDARY IND/COMM SITE				SQ. FT.					[ ] %	
3 UNDEVELOPED										
4 OPEN TILLABLE		SOIL I.D.	ACREAGE		FACTOR					
5 OPEN NON-TILLABLE										
6 WOOD/WASTELAND										
61 PUBLIC ROAD	1		1.72		8000			13760	[ ] %	13760
7 HOME SITE										
8			•						[ ] %	
9			•						[ ] %	
0			•						[ ] %	
			•						[ ] %	
			•						[ ] %	
			•						[ ] %	
			•						[ ] %	
			•						[ ] %	
			•						[ ] %	
			•						[ ] %	
TOTAL ACREAGE								TOTAL TRUE CASH LAND VALUE		13760

1 AGRICULTURAL
00 vacant land
01 cash grain/gen farm
02 livestock o/t 03 & 04
03 dairy farms
04 poultry farms
05 fruit & nut farms
06 vegetable farms
07 tobacco farms
08 nurseries
09 greenhouses
20 timber
99 other agricultural use

2 MINERAL

3 INDUSTRIAL
00 vacant l.
10 food & drink
20 foundries & heavy mfg
30 medium mfg. & assemb
40 light mfg & assembly
50 ind. warehouses
60 ind. truck terminals
70 small shops
80 mines & quarries
90 grain elevators
99 other ind structures

4 COMMERCIAL
00 vacant land
01 04-19 family apts
02 20-39 family apts.
03 40 or more families
10 motels/tourist cabins
11 hotels
12 nursing hms/hospitals
15 mobile home parks
16 Comm camp grounds
19 other Comm. housing
20 small det. retl. (-10000
21 supermarkets
22 discnt/jr. dept. stores
24 full line dept. stores
25 neighborhd shop. cent
26 community shop. centr
27 regional shop. center
29 other retail struct
30 rest., cafe and/or bar
35 drive-in restaurant
39 other food svc. struct.
40 dry clean plant/laundr
41 funeral homes
42 med. clinics & offices
44 full service banks
45 savings and loans
47 office bldg—1 & 2 stor
48 office o/t 47—walk up
49 office o/t 47—elevato
52 auto service station
53 car washes
54 auto sales & service
55 Comm. garage
56 parking lot or struct.
60 theaters
61 drive in theaters
62 golf range/min. coursi
63 golf courses
64 bowling alleys
65 lodge halls/amuse. pk
80 Comm. warehouses
82 Comm. truck terminals
90 marine svc facilities
96 marinas (small boats)
99 other Comm. structure

5 RESIDENTIAL
0 vacant land
1 one-family dwelling
2 two-family dwelling
3 three-family dwelling
4 house trailer (reall
5 condominium unit
0 platted lot
1 unplatted 0-09.99 acs
2 unplatted 10-19.99 acs
3 unplatted 20-29.99 acs
4 unplatted 30-39.99 acs
5 unplatted 40+
99 other res structures

25-06-18-251-002

PROPERTY RECORD

TOWNSHIP OR CORPORATION: CONCORD

TAXING DISTRICT: CONCORD

SECTION OR PLAT: 2-25

ROUTING NUMBER

ADDRESS OF PROPERTY

CLASS OF PROPERTY

CARD NUMBER ___ OF ___

~~5-6-1 57-1754-1~~
5-19-56-7 373A-16608

Pt S½ NE¼ Sec 18
561.3'S N Line S½ NE¼
160'x468.78' 1.72A

~~CENTRAL WAREHOUSE CORP.,~~
~~2500 S. 17th ST.~~
ELKHART, ~~IND.~~

RECORD OF OWNERSHIP

	DATE	STAMPS
~~Dietzgen Corp.~~		
~~2425 Bo Sheffield Av Chicago 60600~~	7-15-75	#8175
~~2500 So 17th St Ell.~~		
Anderson, Lee R.		
2366 Rose Place, St. Paul, Minnesota 55113	7-6-77	9024

ASSESSMENT RECO

1976	LAND	2870
	BLDGS.	
	TOTAL	2870
1976	LAND	860
	BLDGS.	—
	TOTAL	860
1976	LAND	1,29
	BLDGS.	—
	TOTAL	1,29
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	

LAND VALUE COMPUTATIONS AND SUMMARY

FRONTAGE	DEPTH	UNIT VALUE	DEPTH FACTOR	ACTUAL VALUE	TRUE CASH VALUE	ASSESSED VALUE
LOT DEPRECIATION						
CORNER INFL.						

CLASSIFICATION	NO. OF ACRES	RATE		
TILLABLE LAND	1			
TILLABLE LAND				
PASTURE				
WOODLAND				
WASTELAND				
Comm.	1 1/2	1500	2580	
HOMESITE				
TOTAL ACREAGE 76	1 1/2	500	8600,	2,870
TOTAL VALUE LAND			2580	860
TOTAL VALUE BUILDINGS				1
TOTAL VALUE LAND AND BUILDINGS			2580	860

MEMORANDA

CBL '76 entry appealed to State 7-29-77

PROPERTY FACTORS

TOPOGRAPHY		IMPROVEMENTS		STREET OR ROAD		DISTRICT	
LEVEL		CITY WATER		PAVED		IMPROVING	
HIGH		SEWER		SEMI-IMPROVED		STATIC	
LOW		GAS		UNIMPROVED		DECLINING	
R G		ELECTRICITY					
S /		ALL UTILITIES		SIDEWALK		BLIGHTED AREA	

BUILDING PERMIT RECORD

DATE	NUMBER	AMOUNT	PURPOSE

ELKHART COUNTY CONCORD TOWNSHIP ELK. CITY CORPORATION

DISTRICT	SECTION & PLAT	ROUTING NUMBER	CARD NUMBER
[illegible]	[illegible]	[illegible]	01 OF 01

I

5-19-56-7 373A-1660 OWNERSHIP

Pt NE ex 4.35A ex .17A ex 14.06A
Sec 18 5.91A

~~DIETZGEN CORPORATION (A DEL CORP~~
~~2424 N. SHEFFIELD AV.~~
~~CHICAGO, ILL. 60614~~

TRANSFER OF OWNERSHIP	DATE
Anderson, Lee R. #9024	7/6/77
2366 Rose Place Street, St Paul Minn. 55113	

PROPERTY ADDRESS

2500 S. 17th St 46517

MEMORANDUM

1-1-80 Agreement per School Districts.
Taxing Unit changed per Annexation #2145.

PT PLANT SITE Post concld. and 2nd site

PROPERTY CLASS 330

1 AGRICULTURAL
00 vacant land
01 cash grain/gen. farr
02 livestock o/t 03 & 0
03 dairy farms
04 poultry farms
05 fruit & nut farms
06 vegetable farms
07 tobacco farms
08 nurseries
09 greenhouses
20 timber
99 other agricultural us

2 MINERAL

3 INDUSTRIAL
00 vacant l.
10 food & drink
20 foundries & heavy m
30 medium mfg. & asse
40 light mfg & assembl
50 Ind. warehouses
60 Ind. truck terminals
70 small shops
80 mines & quarries
90 grain elevators
99 other Ind. structures

4 COMMERCIAL
00 vacant land
01 04-19 family apts.
02 20-39 family apts.
03 40 or more families
10 motels/tourist cabir
11 hotels
12 nursing hms/hospita
15 mobile home parks
16 Comm. camp grounds
19 other Comm. housing
20 small det. retl. (-1000
21 supermarkets
22 discnt/jr. dept. store
24 full line dept. stores
25 neighborhd. shop. ce
26 community shop. cen
27 regional shop. center
29 other retail struct.
30 rest., cafe and/or ba
35 drive-in restaurant
39 other food svc. struc
40 dry clean plant/laun
41 funeral homes
42 med. clinics & office
44 full service banks
45 savings and loans
47 office bldg.–1 & 2 st
48 office o/t 47–walk u
49 office o/t 47–elevat
52 auto service station
53 car washes
54 auto sales & service
55 Comm. garage
56 parking lot or struct.
60 theaters
61 drive-in theaters
62 golf range/min. cour
63 golf courses
64 bowling alleys
65 lodge halls/amuse. p
80 Comm. warehouses
82 Comm. truck termina
90 marine svc. facilities
96 marinas (small boats)
99 other Comm. structur

5 RESIDENTIAL
0 vacant land
1 one-family dwelling
2 two-family dwelling
3 three-family dwelling
4 house trailer (real)
5 condominium unit
0 platted lot
1 unplatted 0-09.99 a
2 unplatted 10-19.99 a
3 unplatted 20-29.99 a
4 unplatted 30-39.99 a
5 unplatted 40+
99 other res. structures

VALUATION RECORD

ASSESSMENT YEAR		1978	19 79	19___	19___	19___	19___	19___	19___
REASON FOR CHANGE		REVALUATION	D						
TRUE CASH VALUE	LAND	36370	47280						
	IMPROVEMENTS	—	872700						
	TOTAL	36370	919980						
ASSESSED VALUE	LAND	12120	15760						
	IMPROVEMENTS	—	290900						
	TOTAL	12120	306660						

LAND DATA AND COMPUTATIONS

TOPOGRAPHY		PUBLIC UTILITIES	
LEVEL	✓	WATER	
HIGH		SEWER	
LOW		GAS	✓
ROLLING		ELECTRICITY	✓
SWAMPY		ALL	
STREET OR ROAD		NEIGHBORHOOD	
PAVED	✓	IMPROVING	
UNPAVED		STATIC	✓
PROPOSED		DECLINING	
SIDEWALK			
ALLEY		BLIGHTED	

INFLUENCE FACTOR

1 CORNER INFLUENCE
2 ALLEY INFLUENCE
3 TOPOGRAPHY
4 UNDER IMPROVED
5 EXCESS FRONTAGE
6 SHAPE OR SIZE
7 MISIMPROVEMENT
8 RESTRICTIONS
9 VIEW

LAND TYPE		ACTUAL FRONTAGE	EFFECTIVE FRONTAGE	EFFECTIVE DEPTH	DEPTH FACTOR	BASE RATE	ADJUSTED RATE	EXTENDED VALUE	INFLUENCE FACTOR	TRUE CASH VALUE
F FRONT LOT		•							[ ] %	
R REAR LOT		•							[ ] %	
1 PRIMARY IND/COMM SITE		•							[ ] %	
2 SECONDARY IND/COMM SITE										
3 UNDEVELOPED				SQ. FT.					[ ] %	
4 OPEN TILLABLE										
5 OPEN NON-TILLABLE		SOIL I.D.	ACREAGE		FACTOR					
6 WOOD/WASTELAND										
61 PUBLIC ROAD	1		2.50			8000		~~20000~~	[ ] %	~~20000~~
7 HOME SITE	2		3.41			8000		27280	0.41 [ ] -40 %	16370
8										
9										
0	1		5.91			8000		47280	[ ] %	47280
			•						[ ] %	
			•						[ ] %	
			•						[ ] %	
			•						[ ] %	
			•						[ ] %	
			•						[ ] %	
			•						[ ] %	
			•						[ ] %	47

TOTAL ACREAGE TOTAL TRUE CASH VALUE

IMPROVEMENT DATA AND COMPUTATIONS

RESIDENTIAL BUILDINGS

OCCUPANCY	STORY HEIGHT	ATTIC	BSMT	CRAWL
SINGLE FAMILY	1 STORY	0 NONE	0 NONE	0 NONE
DUPLEX	1½ STORY	1 UNFINISHED		
TRIPLEX	2 STORY	2 FINISHED		
4-6 FAMILY	BI-LEVEL	3 PARTIAL FINISHED		
	TRI-LEVEL	4 FINISHED		
ROW-TYPE				

CONSTRUCTION	BASE AREA	FLOOR LEVEL	FIN. LIVING AREA	VALUE
FRAME OR ALUM.				
STUCCO				
TILE				
CONCRETE BLOCK				
METAL				
CONCRETE				
BRICK		ATTIC		
STONE				
FRAME W/MAS.		BSMT-CRAWL		

ROOFING	
PHALT SHINGLES	
ATE OR TILE	
TAL	

DOORS	B	1	UP
RTH			
AB			
B & JOISTS			
. WOOD OR FIR			
RQUET			
E			
RPET			
FINISHED			

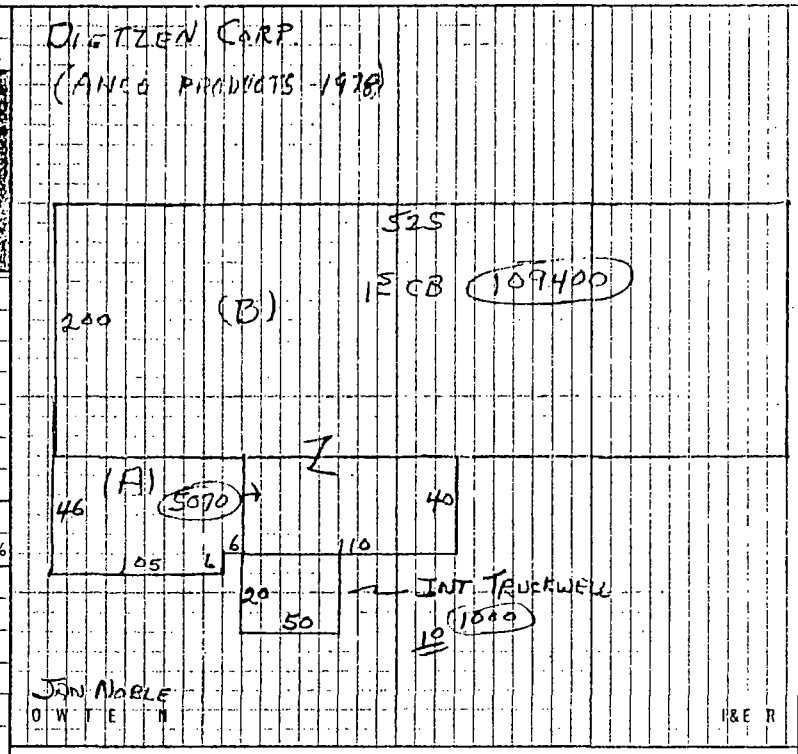
T. FINISH	B	1	A
STR OR D.W.			
NELING			
ERBOARD			
FINISHED			

COMMODATIONS	
MBER OF ROOMS	
DROOMS	
MILY ROOM	
RMAL DINING ROOM	
C. ROOM TYPE	
C. ROOM SIZE	
REPLACE STACKS	
REPLACE OPENINGS	
ATING BASE	
HEATING	
NTRAL WARM AIR	
N. OR STEAM	
NTRAL AIR COND.	
UMBING BASE	
PLUMBING	
ATER ONLY	
LL BATHS	
ALF BATHS	
C. & LAVS.	

TOTAL BASE	±	
ROW-TYPE ADJUSTMENT		%
SUB-TOTAL		
UNFINISHED INTERIOR		
EXTRA LIVING UNITS		
REC. ROOM		
FIREPLACE		
NO HEATING		
AIR CONDITIONING		
NO PLUMBING		
BASE PLBG. [−]		
BASE PLBG. [+]		
SUB-TOTAL, ONE UNIT		
SUB-TOTAL, ___ UNITS		
GARAGES & CARPORTS		
EXTERIOR FEATURES		
SUB-TOTAL		
GRADE & DESIGN FACTOR [ ]		%
REPRODUCTION COST		
COST FACTOR		
REPRODUCTION COST		

REMODELING & MODERNIZATION

EXTERIOR	
INTERIOR	
KITCHEN	
BATH FACILITIES	
PLUMBING SYSTEM	
HEATING SYSTEM	
ELECTRICAL SYSTEM	
TENSIONS	



SPECIAL FEATURES FOR COMMERCIAL/INDUSTRIAL BUILDINGS

QTY	ITEM DESCRIPTION	VALUE
	PENT HOUSE	
	TOTAL (TO BE CARRIED TO PRICING LADDER)	

COMMERCIAL/INDUSTRIAL BUILDING

WALLS		ROOFING	
BRICK	A	BUILT UP	AB
STONE		METAL	
CONCRETE		SLATE/TILE	
WO/MTL.		SHINGLE	
CB/MTL	B		
		INSUL.	

FRAMING	B	1	2	UP
WOOD JOIST				
FIRE RESISTNT		AB		
FIRE PROOF				
FLOORS				
CONCRETE		B		
WOOD				
TILE CARP		A		
FINISH TYPE				
UNFINISHED		B		
SEMI FINISHED				
FINISHED OPEN				
FIN. DIVIDED		A		
USE				
STORE				
OFFICE		A		
APARTMENT				
FACTORY		B		
VACANT				
ABANDONED				
HEATING & A.C.				
NO HEATING				
CEN. WARM AIR		A		
H.W. OR STEAM				
UNIT HEATING		B		
CENTRAL AIR		A		
PKG/UNIT AIR				
PLUMBING				
FULL BATHS				
HALF BATHS				
OTHER FIXT.		35		
SPRINKLER				

	A	B
PRICING KEY	9-1-2	3-1-2
S.F. AREA	5000	109400
EFF. PERIMETER	103 LF	1530 LF
PERIM. AREA RATIO	2	1
NUMBER OF UNITS		
AVE. UNIT SIZE		

FLOOR	HGT	RATE	HGT	RATE
FRMG				
BSMT.				
FIRST	14	19.70	20	9.55
SECOND				
	0		16	.70
BASE PRICE	19.70		10.45	
B.P.A. %	100%		100%	
SUB. TOTAL	19.70		10.45	
UNIT FINISH				
INTERIOR FINISH				
DIV. WALLS				
LIGHTING				
HEATING & A.C.	+ 1.90			
SPRINKLER				
S.F. ~~UNIT~~ PRICE	21.60		10.45	
AREA CUBAGE	5000		109400	
SUB-TOTAL	109500		1143200	
PLUMBING				
SPECIAL FEATURES				
EXTERIOR FEAT.			+ 1000	
TOTAL BASE	123500		1144200	
G/D FACTOR %	100		100	
REPRO. COST	123500		1144200	
COST FACTOR				
REPRO. COST				

SUMMARY OF IMPROVEMENTS

I.D.	USE	STORY HEIGHT	CONST.	GRADE	YEAR CONST.	YEAR REMOD.	COND.	SIZE	AREA	RATE	REPRODUCTION COST	ACCRUED DEPRECIATION NORM.	OBSOL.	TOTAL	TRUE CASH VALUE
	DWELLING	—	—	—				—	—	—					
	GARAGE														
B	FACTORY	1E	CB		1972		G				1,144,200	20	10	30	800700
A	OFFICE	1E	BR		1972		G				123500	20	30	50	61800
ASPH	PAVING		ASPH						HAZARD	.50	20				

DATA COLLECTOR/DATE 2-11-77

APPRAISER/DATE DH 11-14-77

TOTAL TRUE CASH IMPROVEMENT VALUE 872700

25-06-18-251-001

PROPERTY RECORD

OWNER OR CORPORATION: CONCORD

TAXING DISTRICT: CONCORD

SECTION OR PLAT: 2-25

ROUTING NUMBER:

ADDRESS OF PROPERTY: 2500 So. 17TH. St.

CLASS OF PROPERTY: INDUS.

CARD NUMBER: 1 OF 2

~~5-6-1 57-1752~~

5-19-56-7 373A-16607

Pt NE ex 4.35A ex .17A ex 14.06A
Sec 18 5.91A

~~CENTRAL WAREHOUSE CORP., IND~~
~~8600 S. MAIN ST.~~ ~~CORP.~~
~~ELKHART, IND.~~

RECORD OF OWNERSHIP

	DATE	STAMPS
~~Dietzen Corporation~~	7-15-75	#8175
~~2500 So. 17th St~~		
Anderson, Lee R.		
2366 Rose Place, St. Paul, Minnesota 55113	7-6-77	9024

ASSESSMENT RECORD

19	LAND	
	BLDGS.	~~14340~~
	TOTAL	
1976	LAND	14780
	BLDGS.	146620
	TOTAL	161400
1976	LAND	7870
	BLDGS.	146620
	TOTAL	154490
1976	LAND	8,870
	BLDGS.	146,620
	TOTAL	155,490
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	B	

LAND VALUE COMPUTATIONS AND SUMMARY

FRONTAGE	DEPTH	UNIT VALUE	DEPTH FACTOR	ACTUAL VALUE	TRUE CASH VALUE	ASSESSED VALUE
DEPRECIATION						
INNER INFL.						

CLASSIFICATION	NO. OF ACRES	RATE		
TAXABLE LAND				
TAXABLE LAND				
FUTURE			23640	7870
WOODLAND			476,500	158770
PASTELAND			499,840	166,646
	1.91	4000		
WASTE		7500	44,325.	14780.
TOTAL ACREAGE				
TOTAL VALUE LAND			23640	7870
TOTAL VALUE BUILDINGS			431,990	143,990
TOTAL VALUE LAND AND BUILDINGS			455,430	151,660
				151,800

MEMORANDA

Bldg. based by Dietzen Inc.
CBL '76 entry. appealed to State 2-9-77

(72) Correction

23640 - 7870
439860 146620
463500 154490

BUILDING PERMIT RECORD

DATE	NUMBER	AMOUNT	PURPOSE
-12-71	B3824	134,000	Warehouse @ 75%

PROPERTY FACTORS

TOPOGRAPHY		IMPROVEMENTS		STREET OR ROAD		DISTRICT	
LEVEL	✓	CITY WATER		PAVED		IMPROVING	✓
HIGH		SEWER		SEMI-IMPROVED	✓	STATIC	
LOW		GAS	✓	UNIMPROVED		DECLINING	
ROLLING		ELECTRICITY	✓				
SWAMP		ALL UTILITIES		SIDEWALK		BLIGHTED AREA	

BUILDING RECORD

MR. GAGE

CONSTRUCTION SPECIFICATIONS

OCCUPANCY

2 DWELLING — (3) OTHER

BASEMENT

2 CRAWL — 3 PART — 4 HALF — 5 FULL

HEATING

(2) BASE — (3) AIRCON

IR
TER/STEAM
URNACE
ATERS ✓

WALLS

STUCCO
TE BLOCK ✓
TONE
LASS FRONT

ROOF

E—ASPHALT/ASBESTOS
TILE
D/STL FRAMING ✓

FLOORS

	B	1	2	3
TE			✓	
OOD				
RAMING				
RAMING			✓	
ONCRETE				

INTERIOR FINISH

	B	1	2	3
RY WALL				
OARD			✓	
SHED				

ER OF ROOMS

3RD

FAMILY RM

PLUMBING

PLUMBING

STANDARD		
BATHROOM	NO	
TOILET ROOM		
SINK/LAVATORY	NO	
WATER CLOSET		
WATER HEATER	A	
URINAL		
NO PLUMBING		

ATTIC

1 NONE — 2 UNFIN. — 3 HALF — 4 FULL

OTHER FEATURES

PART MASONRY WALLS		
FIREPLACE		
MODERN KITCHEN		
FINISHED BASEMENT		

DWELLING COMPUTATIONS

UNIT	AMOUNT
S.F.	
BASEMENT	
HEATING	
PLUMBING	
ATTIC	
ADDNS. & PCHS.	
SUBTOTAL	
GRADE FACT. %	
OTHER FEATURES	
DESIGN FACT. %	
SUBTOTAL	
COUNTY FACTOR	
REPL. VALUE	

COMMERCIAL COMPUTATIONS

WL. HT.		BLDG. A	BLDG. B	WL. HT.
	B			
	1ST			
	2ND			
	3RD			
SUB TOTAL				
C & GF %				
BASE PRICE				
B.P.A. %				
FRONT				
HTG-A.C.				
LIGHTING				
PLUMBING				
PARTITIONS				
FLOORS				
ELEVATOR				
SPRINKLER				
S.F. PRICE				
AREA				
SUBTOTAL				
ADDNS.				
TOTAL BASE				
COUNTY FACTOR				
REPL. VALUE				

(A) 1120 ↑ F x 40 = 44800
71344 ↑ C 3.80 = 271110
ADDN 400
1920 ↑ 4.50 = 8640
324950

(B) 15876 ↑ C 6.50 = 103190

BUILDING TYPE	NO.	CONSTRUCTION	SIZE	UNIT VALUE	GRADE	AGE	CDU	REPL. VALUE	DEPR.	TRUE CASH VALUE
DWELLING										
GARAGE										
	A	1F C.B.			C+	1960	G	324950	15%	276210
	B	H.1 1/2 C.B.			B	1968	G	103190	3%	100090
OFFICE	C	1 1/2 BE	3895	8.50	C	1960	G	33110	15%	28140
DOCK	D	1 1/2 BE	3100	4.20		1960	G	13020	15%	11070
	E	1 1/2 BR	2337	4.00		1960	G	9350	15%	7950
CONC	WELL	PIT	224	5.00		1960	G	1120	20%	900
AVG.			31200 #	.25				7800	50%	3900
R.R. JOB			420 ↑ F	14.00				5880	40%	3530
CARD 16609	F		8188	4.00				36846		34[illegible]
	G		1920	4.00				CF 8070		[illegible]
LISTED K.K.		DATE 3-20-69								
SKETCHED K.K.								TOTAL TRUE CASH VALUE OF BUILDINGS		453790

GRADE DENOTES QUALITY OF CONSTRUCTION; A—EXCELLENT; B— OD; C—AVERAGE; D—CHEAP; E—VERY CHEAP
CDU FACTOR REFERS TO THE CONDITION, DESIRABILI ID USEFULNESS OF THE BUILDING

364

(A)

1 S CB 18' HI. 1960

71344

196

CONC. FDTN. & FLR. WLS. CONC. H'HI. 8" C.B. & STL. JA 18' HI
FLAT TYPE T&G. RFG. INSUL. STL. DKG. 24" STL. BAR. JSTS.
6' O.C. 21"X9" STL. BMS. 32' O.C. 8"X6½ STL. COLS. 32'X42' O.C.
INCL. LTG. HTG. & SPRINK.

1 S CB.
4/00
13
8

20
1 S CB
1968
60
1920
36
20

81
(B)
1 S CB 25' HI. 196

15876

CONC. FDTN. & FLR.
8" C.B. WLS.
FLAT STL. DKG. RF.
30" B. JST. 6' O.C.
196 10"X8" STL.
COLS. 30' O.C.
INCL. LTG. HTG.
1-WC 1-URIN.
2-LAVS.
INCL. AIR COND.
INCL. MET. FRNT
HJE 20'X66'X8' HI.

1 S BR. 1960
41
(C)
3895
OFFICE
95

1 S BR. 1960
(D)
62
3100
50

1 S BR. 1960
41
(E)
2337
57

(G)
20X96
1 Rec @400

(F)
45X193
8685
@ 400
SEE CARD
166.0

10' DEEP
CONC. WELL
PIT
224
14
16

EUGENE DIETZGEN CO. 2500 So. 17TH ST.

11-26-75

E C C 16607

wouldn't have card.

Trans. # 8175

7-15-75

From Central Warehouse

to Reitzgen Corp.

PROPERTY RECORD

TOWNSHIP OR CORPORATION: CONCORD

TAXING DISTRICT: CONCORD

SECTION OR PLAT: 8-95 2-12

ROUTING NUMBER:

ADDRESS OF PROPERTY:

CLASS OF PROPERTY:

CARD NUMBER ___ OF ___

~~5-6-1 57-1755~~
5-19-56-7 373A-16610
SW Cor NE¼ (Oakland Pk. Lots 18-24 Vacated) Sec 18 4.59A

~~DIETZGEN, EUGENE CO., A DEL CORP~~
~~2425 N. SHEFFIELD AVE.~~
~~CHICAGO 14, ILLINOIS~~
60600
2500 S 17th St. Elk

RECORD OF OWNERSHIP	DATE	STAMPS
Anderson, Lee R.		
2366 Rose Place, St. Paul, Minnesota 55113	7-6-77	9024

ASSESSMENT RECORD		
1976	LAND	6,870
	BLDGS.	
	TOTAL	6,870
1976	LAND	2060
	BLDGS.	
	TOTAL	2060
1976	LAND	3,090
	BLDGS.	
	TOTAL	3,090
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	
19	LAND	
	BLDGS.	
	TOTAL	

LAND VALUE COMPUTATIONS AND SUMMARY

FRONTAGE	DEPTH	UNIT VALUE	DEPTH FACTOR	ACTUAL VALUE	TRUE CASH VALUE	ASSESSED VALUE
IT DEPRECIATION						
ORNER INFL.						

CLASSIFICATION	NO. OF ACRES		RATE	TRUE CASH VALUE	ASSESSED VALUE
LLABLE LAND	4	12.	1500	6180	
LLABLE LAND	(1½) 1½		5000	20600.	6,870.
ASTURE					
OODLAND					
ASTELAND					
Rd	1-C		-00		
OMESITE					
TOTAL ACREAGE					
TOTAL VALUE LAND				6180	2060
TOTAL VALUE BUILDINGS					
TOTAL VALUE LAND AND BUILDINGS				6180	2060

MEMORANDA

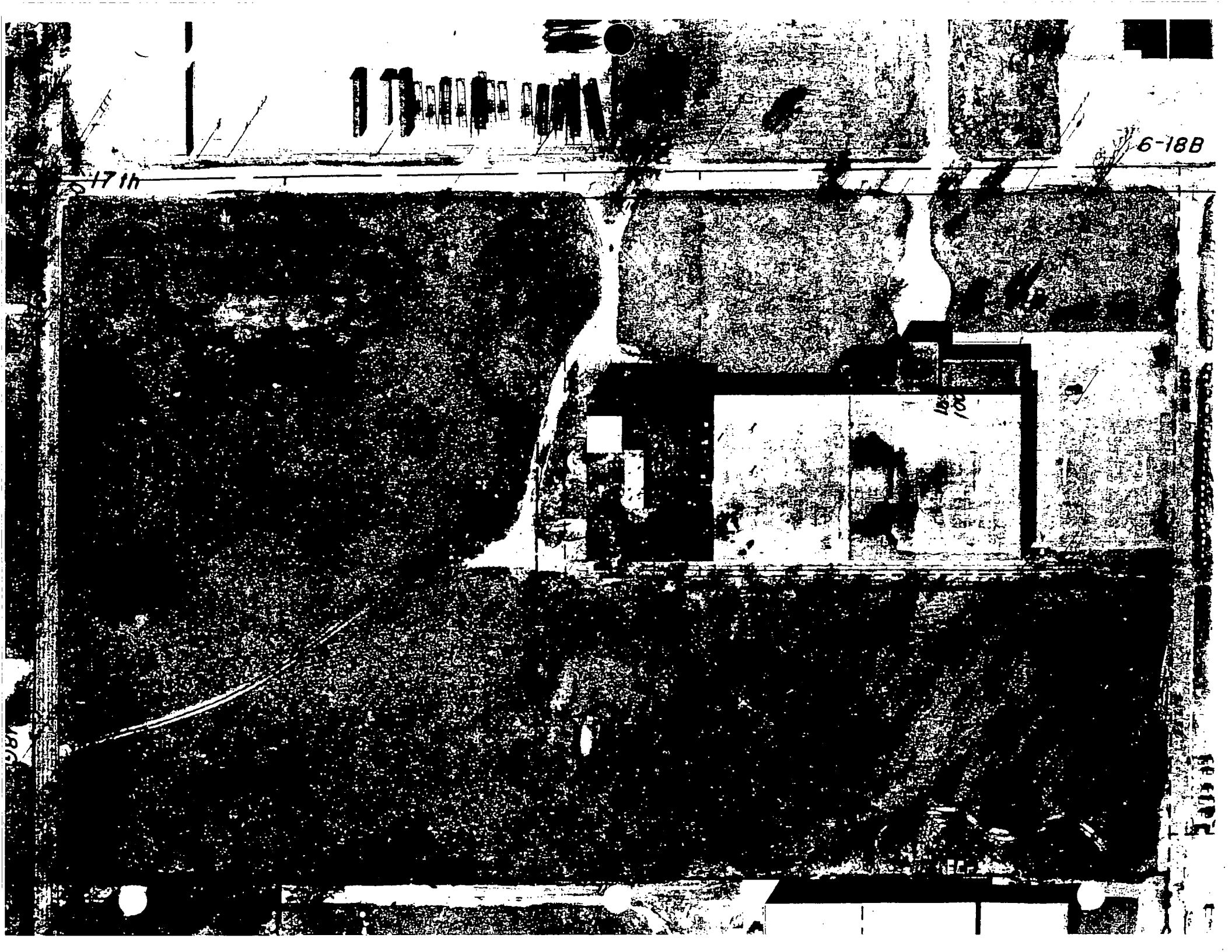
CBL 76 entry appealed to State 7-29-77

BUILDING PERMIT RECORD

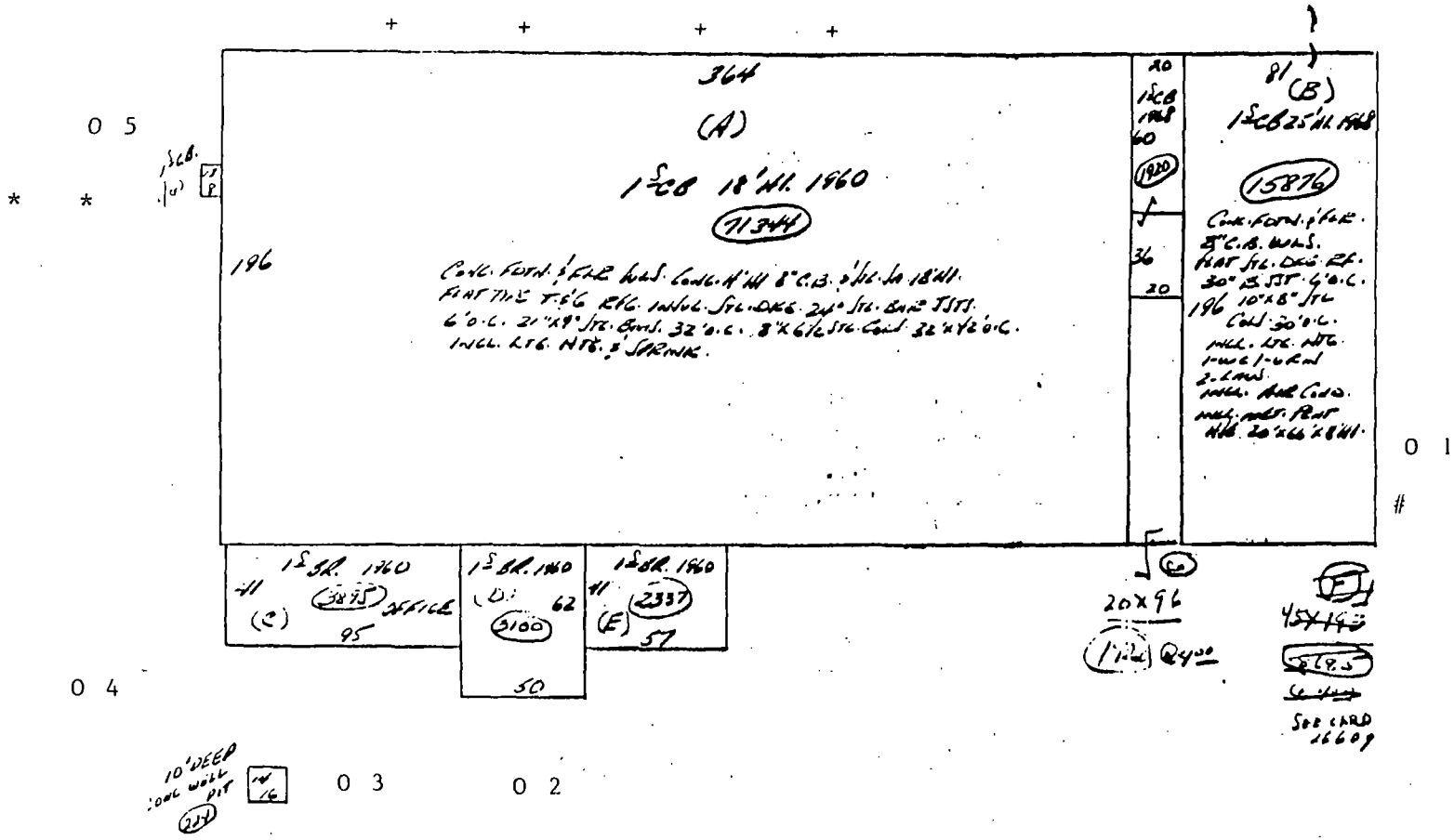
DATE	NUMBER	AMOUNT	PURPOSE

PROPERTY FACTORS

TOPOGRAPHY		IMPROVEMENTS		STREET OR ROAD		DISTRICT	
LEVEL	✓	CITY WATER		PAVED		IMPROVING	
HIGH		SEWER		SEMI-IMPROVED	✓	STATIC	✓
LOW		GAS		UNIMPROVED		DECLINING	
ROLL		ELECTRICITY	✓				
SWAMPY		ALL UTILITIES		SIDEWALK		BLIGHTED AREA	


6-18B
17th

RAILROAD AREA



EUGENE DIETZGEN CO. 2500 So. 17TH ST.

+ = Hand Auger/Soil Borings

0 = Proposed Monitor Well

* = Cement Slabs

= USTs Location

DIVISION OF WATER
DEPARTMENT OF NATURAL RESOURCES, STATE OF INDIANA
STATE OFFICE BUILDING
INDIANAPOLIS, INDIANA 46204
Telephone 633-5267 Area Code 317

JUN 1974 RECEIVED DEPT. OF NATURAL RESOURCES DIVISION OF WATER

WATER WELL RECORD

WELL LOCATION

(Fill in completely - Refer to instruction sheet)

County in which well was drilled Elkhart Civil Township Concord

Driving directions to the well location: Include County Road Names, Numbers, Subdivision Name, lot number, distinctive landmarks, etc.

1320 Marble Ave Elkhart

NAME OF WELL OWNER and/or BUILDING CONTRACTOR

Well Owner Hobart D Blough Sr Address 1320 Marble Elk.

Building Contractor _____ Address _____

Name of Well Drilling Contractor: ELKHART CO. FARM BUREAU CO-OP ASSN.

Address 212 W Lincoln Goshen

Name of Drilling Equipment Operator: Bill Hoover

WELL INFORMATION

Depth of well: 46' Date well was completed: May 10, 1974

Diameter of casing or drive pipe: 2½" Total Length: 18' LEN

Diameter of liner (if used): _____ Total Length: _____

Diameter of Screen: 2" Length: 6' Slot Size: 10

Type of Well: Drilled [X] Gravel Pack [ ] Driven [ ] Other _____

Use of Well: For Home [X] For Industry [ ] For Public Supply [ ] Stock [ ]

Method of Drilling: Cable Tools [ ] Rotary [ ] Rev. Rotary [ ] Jet [X] Bucket Rig [ ]

Static water level in completed well (Distance from ground to water level) _____ feet

Bailer Test: Hours Tested _____ Rate _____ g.p.m. Drawdown _____ ft.

Pumping Test: Hours Tested _____ Rate _____ g.p.m. Drawdown _____ ft.

(Drawdown is the difference between static level and water level at end of test)

Signature Bill Hoover

Date 5/13/74

FOR WELL LOG SPACE USE REVERSE SIDE OF THIS SHEET

FOR ADMINISTRATIVE USE ONLY
(Well driller does fill out)

COUNTY Elkhart TWP. 37N RGE. 5E ¼ ¼ NE SEC 18 Subdivision Name

Topo Map Elkhart 7½ Ft W of EL. Ground Elevation ~755

Field Located By Date Ft N of SL. Depth to bedrock

Courthouse Location By Date Ft E of WL. Bedrock elevation

Location accepted w/o verification by LSV 5-20-76 Ft S of NL. Aquifer elevation Lot Number

WATER WELL LOG

To	From	FORMATIONS (Color, type of material, hardness, etc.)
10	0	Sand
35	10	Gravel & Clay
46	35	Gravel

DIVISION OF WATER
DEPARTMENT OF NATURAL RESOURCES, STATE OF INDIANA
STATE OFFICE BUILDING
INDIANAPOLIS, INDIANA 46204
Telephone 633-5267 Area Code 317

SEP 1974
RECEIVED
DEPT. OF NATURAL RESOURCES
DIVISION OF WATER

WATER WELL RECORD

WELL LOCATION

(Fill in completely - Refer to instruction sheet)

County in which well was drilled Elkart Civil Township Concord

Driving directions to the well location: Include County Road Names, Numbers, Subdivision Name, lot number, distinctive landmarks, etc.

1321 Fieldhouse off of 14th street

NAME OF WELL OWNER and/or BUILDING CONTRACTOR

Well Owner James Barnett Address 1321 Fieldhouse

Building Contractor _____ Address _____

Name of Well Drilling Contractor: R. L. Mayfield

Address 10807 Leland Rd.

Name of Drilling Equipment Operator: R. L. Mayfield

WELL INFORMATION

Depth of well: 33' Date well was completed: 8/27/74

Diameter of casing or drive pipe: 2" Total Length: 29'

Diameter of liner (if used): _____ Total Length: _____

Diameter of Screen: 1 1/4 Length: 4' Slot Size: 60 gauge

Type of Well: Drilled ☑ Gravel Pack ☐ Driven ☐ Other _____

Use of Well: For ~~Home~~ GARDEN ☑ For Industry ☐ For Public Supply ☐ Stock ☐

Method of Drilling: Cable Tools ☐ Rotary ☐ Rev. Rotary ☐ Jet ☑ Bucket Rig ☐

Static water level in completed well (Distance from ground to water level) _____ feet

Bailer Test: Hours Tested _____ Rate _____ g.p.m. _____ Drawdown _____ ft.

Pumping Test: Hours Tested 1 Rate 10 g.p.m. _____ Drawdown _____ ft.

(Drawdown is the difference between static level and water level at end of test)

Signature Robert T. Mayfield

Date 8/27/74

FOR WELL LOG SPACE USE REVERSE SIDE OF THIS SHEET

FOR ADMINISTRATIVE USE ONLY
(Well driller does not fill out)

COUNTY Elkhart TWP. 37N RGE. 5E ¼ ¼ NE SEC 18 Subdivision Name

Topo Map Elkhart 7½ Ft W of EL. Ground Elevation

Field Located By Date Ft N of SL. Depth to bedrock

Courthouse Location By Date Ft E of WL. Bedrock elevation

Location accepted w/o verification by Ft S of NL. Aquifer elevation Lot Number

WATER WELL LOG

From	To	FORMATIONS (Color, type of material, hardness, etc.)
0	10	medium brown sand + gravel
10	13	Gray sandy clay
13	20	Brown fine sand
20	25	medium gravel
25	30	Coarse gravel
30	33	Coarse sand + gravel

DIVISION OF WATER
DEPARTMENT OF NATURAL RESOURCES, STATE OF INDIANA
STATE OFFICE BUILDING
INDIANAPOLIS, INDIANA 46209
MElrose 3-6757

WATER WELL RECORD

JAN 197
RECEIVED
DEPT. OF NATURAL RESOURCES
DIVISION OF WATER

INFORMATION ON WELL LOCATION

County in which well was drilled: Elkhart Civil Township: Concord

Congressional township: _____ Range: _____ Number of section: _____

(Fill in as completely as possible)

Describe in your own words the well location with respect to nearby towns, roads, streets or distinctive landmarks: About 1/2 block South of Lively Ave. on 17th Street on west side of Road

Name of owner: Prince Tool and Die Co. Address: 2721-17th Street Elkhart, Indiana 46514

Name of Well Drilling Contractor: B. J. Moore & Son

Address: 1606 N. Indiana Ave. Elkhart, Indiana, 46514

Name of Drilling Equipment Operator: Wayne L. Moore

INFORMATION ON THE WELL

Completed depth of well: 61 ft. Date well was completed: 1976

Diameter of outside casing or drive pipe: 4" Length: 51'

Diameter of inside casing or liner: _____ Length: _____

Diameter of Screen: 3 3/4" Length: 10' Slot size: #10

Type of Well: Drilled ☒ Gravel Pack ☐ Driven ☐ Other _____

Use of Well: For home ☐ For industry ☒ For public supply ☐ Stock ☐

Method of Drilling: Cable Tools ☒ Rotary ☐ Rev. Rotary ☐ Jet ☐ Driven ☐

Static water level in completed well (Distance from ground to water level) 15'-06" ft.

Bailer Test: Hours tested _____ Rate _____ g.p.m. Drawdown _____ ft. (Difference between static level and water level at end of test)

Pumping Test: Hours tested 4 Rate 50 g.p.m. Drawdown 0 ft.

Signature Wayne L. Moore

Date 12/28/76

FOR WELL LOG SPACE USE REVERSE SIDE OF THIS SHEET

Pierce 1001 ≈ NE

FOR ADMINISTRATIVE USE ONLY
(Well driller does not fill out)

COUNTY: Elkhart TWP. 37N RGE. 5E ___ ¼ NE ¼ SW ¼ SEC. 18

Topo Map: Elkhart

Well log classified By TC Date 12-76
Courthouse located By ___ Date ___
Field located By ___ Date ___
Acc. w/o verification By SMB Date 1-7-77

___ Ft W of EL.
___ Ft N of SL.
___ Ft E of WL.
___ Ft S of NL.

Ground elevation ≈762
Depth to bedrock ___
Bedrock elevation ___
Aquifer elevation ___

FORMATIONS (Color, type of material, hardness, etc.)	From	To
Coarse brown sand and gravel	0	24
Coarse gray gravel and clay balls (Hard pan) Cocrotilistib	24	30
Hard sandy blue clay and gravel	30	38
Extremely hard packed gray sand, gravel and stones	38	51
Coarse brown sand, gravel and stones	51	61

REMARKS:

INSTRUCTIONS

This Water Well Record form is designed to record the most essential data concerning a water well. We request that you be as accurate as possible in recording this information as it may be of great assistance in the planning and development of new water supplies.

An accurate location of the well is equally as important as an accurate well log. Please include all information possible in the space provided for well location.

As specified in Chapter 6 of the Acts of 1959, a copy of this report must be submitted within thirty days after the completion of a well to the Division of Water

Base Map

DIVISION OF WATER RESOURCES
INDIANA DEPARTMENT OF CONSERVATION
609 STATE OFFICE BUILDING
INDIANAPOLIS 9, INDIANA

RECEIVED AUG 1965 Dept. of Nat. Resources Division of Water

WATER WELL RECORD

INFORMATION ON WELL LOCATION

County in which well was drilled: Elkhart Civil Township: _____

Congressional township: _____ Range: _____ Number of section: _____

(Fill in as completely as possible)

Describe in your own words the well location with respect to nearby towns, roads, streets or distinctive landmarks: 1407 South 14th St.

Name of owner: Carl Baumgartner Address: 1407 S. 14th St. Goshen

Name of Well Drilling Contractor: Glen Hapner

Address: 907 Gallinger Rd. Goshen, Indiana

Name of Drilling Equipment Operator: Glen Hapner

INFORMATION ON THE WELL

Completed depth of well: 31 ft. Date well was completed: august 4

Diameter of outside casing or drive pipe: 2 in. Length: _____

Diameter of inside casing or liner: _____ Length: _____

Diameter of Screen: 2 in Length: _____ Slot size: 60 ga.

Type of Well: Drilled ☐ Gravel Pack ☐ Driven ☒ Other _____

Use of Well: For home ☐ For industry ☐ For public supply ☐ Stock ☐

Method of Drilling: Cable Tools ☐ Rotary ☐ Rev. Rotary ☐ Jet ☐ Driven ☒

Static water level in completed well (Distance from ground to water level) 21 ft.

Bailer Test: Hours tested _____ Rate _____ g.p.m. Drawdown _____ ft. (Difference between static level and water level at end of test)

Pumping Test: Hours tested _____ Rate _____ g.p.m. Drawdown _____ ft.

Signature Hapner and Son

Date 8/26/65

FOR WELL LOG SPACE USE REVERSE SIDE OF THIS SHEET

FOR ADMINISTRATIVE USE ONLY
(Well driller does not fill ...)

COUNTY: Elk TWP. 32N RGE. 5E ___ ¼ ___ ¼ NE ¼ SEC. 18

Topo Map: Elkhart

Well log classified By dm Date 8/65
Courthouse located By ___ Date ___
Field located By ___ Date ___
Acc. w/o verification By ___ Date ___

___ Ft W of EL. Ground elevation ___
___ Ft N of SL. Depth to bedrock ___
___ Ft E of WL. Bedrock elevation ___
___ Ft S of NL. Aquifer elevation ___

WATER WELL LOG

FORMATIONS (Color, type of material, hardness, etc.)	From	To
Sand & gravel	0	10 ft
gravel & hard pan	10	20
gravel	20	31
This well is used for sprinkling lawn		

REMARKS:

INSTRUCTIONS

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An accurate location of the well is equally as important as an accurate well log. ...ease include all information possible in the space provided for well location.

As specified in Chapter 6 of the Acts of 1959, a copy of this report must be submitted within thirty days after the completion of a well to the Division of Water Resources, Indiana Department of Conservation.

DIVISION OF WATER RESOURCES
INDIANA DEPARTMENT OF CONSERVATION
311 WEST WASHINGTON STREET
INDIANAPOLIS, INDIANA

JAN 1960
RECEIVED
Dept. of Conservation
Division of
Water Resources

WATER WELL RECORD

INFORMATION ON WELL LOCATION

County in which well was drilled: Elkhart Civil Township: Concord

Congressional township: 37 N Range: 5 E Number of section: _____

(Fill in as completely as possible)

Describe in your own words the well location with respect to nearby towns, roads, streets or distinctive landmarks: 1/4 Block East of 17th street and one Block South of Lieuinger Ave., Elkhart, Indiana

Name of owner: Eugene Dietzgen Co Inc. Address: 2500 S. 17th Street

Name of Well Drilling Contractor: B.J. Moore & Son

Address: 1606 W. Indiana Ave. Elkhart, Indiana

Name of Drilling Equipment Operator: Wayne L. Moore

INFORMATION ON THE WELL

Completed depth of well: 89 ft. Date well was completed: _____

Diameter of outside casing or drive pipe: 8" I.D. Length: 68'

Diameter of inside casing or liner: _____ Length: _____

Diameter of Screen: 6 3/4" O.D. Length: 20' Slot size: 30

Type of Well: Drilled ☒ Gravel Pack ☐ Driven ☐ Other _____

Use of Well: For home ☐ For industry ☒ For public supply ☐ Stock ☐

Method of Drilling: Cable Tools ☒ Rotary ☐ Rev. Rotary ☐ Jet ☐ Driven ☐

Static water level in completed well (Distance from ground to water level) 14 ft.

Bailer Test: Hours tested _____ Rate _____ g.p.m. Drawdown _____ ft. (Difference between static level and water level at end of test)

Pumping Test: Hours tested 8 Rate 75 g.p.m. Drawdown 1 ft.

Signature Wayne L. Moore

Date 11/30/59

FOR WELL LOG SPACE USE REVERSE SIDE OF THIS SHEET

FOR ADMINISTRATIVE USE ONLY
(Well Driller does not fill out)

2450 W OF EL
1950 S OF NL

Oil & Gas Co

COUNTY: Elkhart TWP. 37N RGE. 5E NW ¼ SW ¼ NE ¼ SEC. 18

VERIFIED BY PLANT ENGINEER

Topo. Map: Elkhart Loc. accepted w/o verification Yes ___ No ___

El. of grnd. surface at well: 755+ Courthouse Loc. By ___ Date ___
Depth to bedrock: ___ Field Located By PW Date 8-72
Well Log processed by: ___ Placed in Master Well Log File Date ___

WATER WELL LOG

FORMATIONS (Color, type of material, hardness, etc.)	From	To
Brown sand & gravel	0'	10'
gray sand & coarse gravel	10'	26'
Blue clay & coarse gravel	26'	31'
Whitish medium fine &		
Coarse gray sand	31'	42'
Coarse gray sand & gravel	42'	47'
Coarse gray sand & gravel		
mixed with brown clay balls	47'	58'
& silt		
Grayish brown sand, gravel	58'	68'
and clay " "		
Coarse light brown gravel	68'	89'
& stones, with silt		

REMARKS:
Well equipped with 1500 G.P.M. turbine pump for heat pump heating with 12" diameter well at idle nearby

INSTRUCTIONS

This Water Well Record form is designed to record the most essential data concerning a water well. We request that you be as accurate as possible in recording this information as t may be of great assistance in the planning and development of new water supplies.

An accurate location of the well is equally as important as an accurate well log. Please include all information possible in the space provided for well location.

As specified in Chapter 6 of the Acts of 1959, a copy of this report must be submitted within thirty days after the completion of a well to the Division of Water Resources, Indiana Department of Conservation, 311 West Washington Street, Indianapolis, Indiana.

See Map

PLEWS & SHADLEY

ATTORNEYS AT LAW

GEORGE M. PLEWS
SUE A. SHADLEY
PETER M. RACHER
HARINDER KAUR*
TIMOTHY J. PARIS**
DONN H. WRAY***
KARON A. HATLELI °
JEFFREY D. CLAFLIN
JOHN E. KLARQUIST

OF COUNSEL
CRAIG A. WOOD °° †
CHRISTINE C. H. PLEWS
M. SCOTT BARRETT °°°
WILLIAM E. ALLEN

1346 NORTH DELAWARE STREET
INDIANAPOLIS, INDIANA 46202-2415
TELEPHONE (317) 637-0700
TELEFAX (317) 637-0710

* ADMITTED IN INDIANA AND MASSACHUSETTS
** ADMITTED IN INDIANA, CALIFORNIA AND ARIZONA
*** ADMITTED IN INDIANA AND ILLINOIS
° ADMITTED IN INDIANA AND ARIZONA
°° ADMITTED IN INDIANA AND CALIFORNIA
°°° ADMITTED IN NEW YORK AND INDIANA
† ADMITTED U.S. PATENT AND TRADEMARK OFFICE

January 5, 1993

Mr. Michael A. Metz
Barnes & Thornburg
305 Ameritrust National Bank Building
301 South Main Street
Elkhart, Indiana 46516

Re: Request for Production of Documents Directed to Anco Products, Inc.

Dear Mr. Metz:

This will confirm our telephone conversation of January 5, 1993. At that time I advised you that we represent Anco Products, Inc. in responding to your request for production of documents to a non-party.

I told you that Anco is willing to cooperate with you by providing documents and information relevant to your case. However, I also stated that the breadth of your document production requests is so great that, as served, the requests are unduly burdensome. In an effort to cooperate you advised me that we can comply with your requests by providing information related to two general categories:

1. Personal knowledge of individuals in the corporation about procedures utilizing the chemicals TCA and TCE

2. Personal knowledge of individuals in the corporation regarding the release of hazardous materials by the corporation.

Since our conversation I have spoken with Howard Tomlinson, President of Anco. As to category 2, Mr. Tomlinson advises that Anco has never had a release of hazardous

materials. As to category 1, Mr. Tomlinson is in the process of pursuing anecdotal oral leads that a small amount of TCE may have been used by Anco within the last 10 years. We will advise in greater detail after his investigation is complete. He does not believe, on the basis of the anecdotal oral reports, that a large amount was used or ever on Anco's premises.

I told you that, in response to your request for production, Anco is willing to produce its MSDS file (including MSDSs for substances no longer in use) and information pertaining to test borings done on its property over a period of time. As I advised you, the first of those test borings showed that that groundwater under Anco's property was clean, but later borings have shown that TCE has migrated onto Anco's property through the groundwater. I also advised you that Anco has a pending permit application for an air permit with IDEM. Although you indicated that probably that is not germane to your inquiry, we will provide you with the data necessary to help you locate that file at IDEM if you desire to do so. I also advised that Anco closed two stainless steel USTs left behind by the prior owner, Deiztgen Company. Those tanks contained toluene and acetone in small quantities. The solvents remaining in the tanks were cleaned and properly disposed of. Test borings consistent with IDEM's UST closure protocol were taken and showed that the surrounding soil was clean. IDEM issued a closure approval statement on that project and we will provide you with all of those documents or information necessary for you to locate them in IDEM's files.

This will also confirm that you will grant an extension to comply with your request to January 26, 1993. You also agreed that, by extending time pursuant to this agreement, we do not waive any right we may have to object to your request for production pursuant to the rules.

I anticipate being able to provide you with the additional information referred to above in the near future. Should you have any questions or comments do not hesitate to contact me.

Very truly yours,

Donn H. Wray

DHW/rlg
cc: Howard Tomlinson

PLEWS & SHADLEY

ATTORNEYS AT LAW

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SUE A. SHADLEY
PETER M. RACHER
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° ° ° ADMITTED IN NEW YORK AND INDIANA
† ADMITTED U.S. PATENT AND TRADEMARK OFFICE

February 15, 1993

Mr. Howard Tomlinson
Anco Products, Inc.
2500 South 17th Street
Eklhart, Indiana 46517

Dear Howard:

Completing our project on the document production, I enclose for your signature an "Affidavit of Diligent Search in Response to Request for Production of Documents." Mr. Metz has approved the form of this document as being responsive to his desires.

If you would be so kind as to sign this and return it in the self-addressed, stamped envelope provided for your convenience, that will complete our document production. For your information, Mr. Metz has told me that Barnes & Thornburg is having to get out of this case due to a conflict that came up involving one of the non-parties whose documents were subpoenaed in this production request. Mr. Metz tells me that if we get this stuff back to him this week he can still take care of it, otherwise we will have to handle it through successor counsel. I figure it is easier for us to wrap this up with the guy we started with.

Very truly yours,

Donn H. Wray

DHW/rlg
Enclosure

AFFIDAVIT OF DILIGENT SEARCH IN RESPONSE
TO REQUEST FOR PRODUCTION OF DOCUMENTS

Howard Tomlinson, having been duly sworn upon his oath, deposes and says:

1. I am the president of Anco Products, Inc. ("Anco"), and make this affidavit of my own personal knowledge on behalf of Anco.

2. On or about December 28, 1992 Anco was served with a request for production of documents by counsel for Walerko Tool & Engineering Corporation ("Walerko").

3. Subsequently, in consultation with Anco's counsel, counsel for Walerko amended his request for production of documents to include a request for documents and information pertaining to two general categories, specifically:

A. Personal knowledge of individuals employed by Anco about procedures utilizing the chemicals TCA and TCE by Anco; and

B. Personal knowledge of individuals working for Anco regarding the release of hazardous materials by Anco.

Counsel for Walerko further requested any documents pertaining to either of the above general categories.

4. I personally have made diligent search of Anco's records and have also supervised other Anco employees in that diligent search. By means of Anco's counsel's letter of January 26, 1993 (which enclosures) to Michael A. Metz, counsel to Walerko, Anco has previously produced the following documents:

A. Photocopy of Anco's material safety data sheet file including Anco's general product information.

B. Rosters showing "documents of public record" filed by Anco with various environmental agencies.

C. Document dated 1/17/85 with photocopy of drum photograph reflecting that one 55-gallon drum of

trichloroethane was received and returned for credit at that time.

D. Series of invoices and warehouse receipts reflecting purchase of trichloroethane in various amounts at various times and dates ranging from 8/1/79 to 5/23/85.

E. Portion of environmental audit of Anco site conducted by C.H.E.S. Consultants, Inc., in May and June, 1989 with accompanying analytic showing TCE as non-detect on Anco's premises. Additionally, these materials reflect soil samples with 17,000 and 1,900 parts per million total petroleum hydrocarbons at one location. I am advised these were soils impacted by hydraulic fluid that had leaked from the Himco trash compactor and that the impacted soils were removed by Himco later in 1989.

In addition to the above-enumerated documents produced with Anco's counsel's letter of January 26, 1993, I have provided to Walerko's counsel, on behalf of Anco, the Affidavit of Mary Wirt.

5. The above-enumerated documents are all the documents responsive to Walerko's counsel's request, as amended, that I was able to locate as a result of my diligent search.

FURTHER AFFIANT SAYETH NOT.

I hereby swear or affirm under the penalties for perjury that the foregoing representations are true and correct to the best of my knowledge and belief.

Howard Tomlinson

Howard Tomlinson, President, Anco Products, Inc.

Date: Feb 19 1993

AO 88 (Rev. 11/91) Subpoena in a Civil Case

United States District Court

NORTHERN DISTRICT OF INDIANA

UNITED STATES OF AMERICA

V.

WALERKO TOOL AND ENGINEERING CORPORATION

SUBPOENA IN A CIVIL CASE

CASE NUMBER: S91-411 (RLM)

TO: Anco
2500 17th St.
Elkhart, IN 46517

☐ YOU ARE COMMANDED to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

☐ YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case.

PLACE OF DEPOSITION	DATE AND TIME

☒ YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

See Exhibit "A"

PLACE	DATE AND TIME
Barnes & Thornburg 301 South Main Street, Suite 305 Elkhart, IN 46516	Monday, January 11, 1993

☐ YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rules of Civil Procedure, 30(b)(6).

ISSUING OFFICER SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT)	DATE

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION

UNITED STATES OF AMERICA, Plaintiff, vs. WALERKO TOOL AND ENGINEERING CORPORATION, Defendant.	)))))))))	CIVIL CASE NO. S91-411 (RLM)

DEFENDANT WALERKO TOOL & ENGINEERING CORPORATION'S REQUEST FOR PRODUCTION OF DOCUMENTS FROM NON-PARTIES

Defendant Walerko Tool & Engineering Corporation ("Walerko"), pursuant to Rules 5(b), 34(c), and 45 of the Federal Rules of Civil Procedure request the non-party referred to on the Subpoena to which this is an exhibit to produce the documents and tangible items identified below. This production is to be made at the offices of Barnes & Thornburg, 301 South Main Street, Suite 305, Elkhart, Indiana 46514 and is to occur no later than Monday, January 11, 1993.

DEFINITIONS AND INSTRUCTIONS

1. The term "document" means any written, recorded, graphic or other matter whether produced, reproduced, or stored on paper, cards, tapes, disks, belts, charts, film, computer storage devices, or any other medium including, but not limited to, matter in the form of books, manuals, resolutions, minutes, reports, studies, statements, inter-office communications, notebooks, applications, agreements, appointment calendars, working papers, graphs, contracts, memoranda, notes, records, correspondence, diaries, bookkeeping, regulations, and any published

EXHIBIT "A"

material, and also includes, but is not limited to, originals, copies with or without notes or changes thereon, and drafts.

2. The documents requested are those in the possession, custody, or control of, or obtainable by the non-party or by its attorneys.

3. In the event that any document is not produced because of a claim of privilege or other reason, state the following with respect to each document:

a. the date of the document;

b. the author of the document;

c. the addresses and all recipients of the document;

d. the type of document (for example, but not limited to, letter, statement, or memorandum) including the number of pages, attachments, exhibits, and the appendices;

e. a general description of the subject matter of the document; and

f. the nature of the privilege or other reason why the document has not been produced.

REQUESTS

REQUEST NO. 1: Produce all documents relating or referring to any laboratory analysis ever performed by or on behalf of you on any material used by your company or any waste material ever disposed of by or on behalf of your company.

ANSWER:

REQUEST NO. 2: Produce all documents identifying all raw materials, intermediate materials, and finished products ever used or created by your company at its present facility in Elkhart, Indiana, including all chemicals used.

ANSWER:

REQUEST NO. 3: Produce all documents describing, relating to or referring to all pollution control equipment ever operated by your company at its present facility in Elkhart County, Indiana.

ANSWER:

REQUEST NO. 4: Produce all documents describing, relating to, or referring to all manufacturing processes ever performed at your company at its present facility in Elkhart County, Indiana.

ANSWER:

REQUEST NO. 5: Produce all documents relating to or referring to any citations, claimed violations, violations or fines concerning any federal, state, or local laws, regulations, or ordinances by your company at its present facility in Elkhart County, Indiana.

ANSWER:

REQUEST NO. 6: Produce all permits ever issued to your company for releasing or disposing of any materials, substances, or emissions from your company at its present facility in Elkhart County, Indiana, into the air, water, soil, or sewer system including any hazardous waste permits pursuant to the Resource Conservation and Recovery Act.

ANSWER:

REQUEST NO. 7: Produce any and all documents describing all products ever manufactured by your company at its present facility in Elkhart County, Indiana.

ANSWER:

REQUEST NO. 8: Produce all documents describing the ingredients and components contained in all products ever manufactured by your company at its present facility in Elkhart County, Indiana, including material safety data sheets for such products.

ANSWER:

REQUEST NO. 9: Produce all documents relating to or referring to disposal of any hazardous waste by or on behalf of your company at its present facility in Elkhart County, Indiana, including all bills of lading, manifests, and annual hazardous waste disposal forms filed with any federal, state, or local agency.

ANSWER:

REQUEST NO. 10: Produce all documents relating to or referring to the Federal Toxic Substances Control Act, including any 8-E submissions ever made by your company at its present facility in Elkhart County, Indiana.

ANSWER:

REQUEST NO. 11: Please produce any and all documents, including, without limitation, accounting records, cancelled checks, purchase orders, invoices and contracts, relating to or referring to disposal of any waste by or on behalf of your company at its present facility in Elkhart County, Indiana, at any time, whether by your company's employees or by independent contractors.

ANSWER:

REQUEST NO. 12: Produce all documents relating to or referring to operating instructions dealing with any portion of the chemical processes, procedures, and operations ever performed at your company on its present facility in Elkhart County, Indiana, including any documents dealing with the creation, handling, and disposal of residues, filters, filter cakes, solid waste, liquid waste, and emissions.

ANSWER:

REQUEST NO. 13: Produce all documents relating to or referring to any filings, submissions, disclosures, or publications ever made by your company at its present facility in Elkhart County, Indiana, pursuant to any federal or state "right to know" laws.

ANSWER:

REQUEST NO. 14: Produce any and all documents relating to or referring to any products ever made or used by your company at its present facility in Elkhart County, Indiana, which are subject to regulation under the Federal Insecticide, Fungicide, and Rodenticide Act.

ANSWER:

REQUEST NO. 15: Produce all documents relating to or referring to any violations or claim violations by your company of the Occupational Safety and Health Act due to an employee's injury from exposure or claimed injury from exposure to chemicals, including gases, liquids, and solids, in the work place at your company at its present facility in Elkhart County, Indiana.

ANSWER:

REQUEST NO. 16: Produce all documents relating to or referring to any wastes ever disposed of by or on behalf of your company at its present facility in Elkhart County, Indiana.

ANSWER:

REQUEST NO. 17: Produce all documents relating to or referring to your company's record retention policy or policies concerning the present facility in Elkhart County, Indiana.

ANSWER:

REQUEST NO. 18: Produce all documents which identify the names and last known addresses of all present and former employees of your company while at its present facility in Elkhart County, Indiana.

ANSWER:

REQUEST NO. 19: Produce all documents relating to or referring to any inquiry, investigation, visit, or report performed by the United States Environmental Protection Agency or the State of Indiana concerning your present facility in Elkhart County, Indiana.

ANSWER:

Requests for Production Submitted by:
BARNES & THORNBURG

Michael A. Metz
Attorney No. 13722-20
BARNES & THORNBURG
305 Ameritrust National Bank Bldg.
301 South Main Street
Elkhart, Indiana 46516
Telephone: (219) 293-0681

Attorneys for Defendant
Walerko Tool & Engineering

MAM02171

4

PLEWS & SHADLEY

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February 12, 1993

Mr. Howard Tomlinson
Anco Products, Inc.
2500 South 17th Street
Eklhart, Indiana 46517

Dear Howard:

Enclosed is the original of the Mary Wirt affidavit. I received your fax late Friday afternoon. In order to move this matter forward, I figured I would go ahead and send this up notwithstanding the fact I also have to get with Metz to determine the form of your affidavit regarding the document production. I anticipate sending that up to you within the next day or two.

Very truly yours,

Donn H. Wray

DHW/rlg
Enclosure

AFFIDAVIT

Mary Wirt, having been duly sworn upon her oath, deposes and says:

1. My name is Mary Wirt and I make this affidavit of my own personal knowledge acquired throughout the course of my employment with Anco Products, Inc. ("Anco").

2. I have been employed at Anco Products since 1973. Anco moved to its present facility, located at 2500 South 17th Street, Elkhart, Indiana, to the best of my recollection, in early 1978.

3. I have been employed as a machine operator/duct assembler throughout my duration of employment with Anco.

4. Commencing with Anco's location at its present facility in 1978, I worked on 7-foot-long duct-making machines. These machines include 7-foot-long mandrils, which were utilized for the fabrication of fiberglass ducts. This process involved building layers of material with glue between the layers to create a strong fiberglass duct.

5. In the course of making ducts, some glue would spread to unwanted areas. It was necessary to clean that unwanted glue. To clean that glue, we utilized the solvent TCE.

6. We had four 7-foot mandril machines in service at the same time.

7. During the time period we utilized the 7-foot mandril machines, which ended some time in late 1979, each person working on each of the four machines would get about a gallon or a little more TCE in a work bucket by pumping it from a 55-gallon drum equipped with a pump. We would use that gallon of TCE for wiping down the machine and we would also put our glue gun in the bucket to clean it.

8. All of the TCE used for removing unwanted glue would evaporate. Similarly, the TCE used on the glue gun would evaporate. We kept sheets of cardboard underneath the mandril machines to catch drips of glue and TCE. The TCE and the solvents in the glue that fell on the cardboard would all evaporate, and at the end of the week we would throw away dry cardboard.

9. It is my best estimate that, throughout the time period in question, each 7-foot mandril machine utilized about a gallon of TCE during each shift. We were working two shifts a day at that time, so therefore about eight gallons of TCE a day were being used in the above-described fashion. All of that TCE evaporated.

10. In late 1979, the 7-foot mandrils were discontinued. We went to a 25-foot "hot melt" system. These mandrils also required cleaning with TCE, which was accomplished in a similar fashion. We also had four 25-foot hot melt mandril machines, and we were working two shifts. However, the use of the 25-foot machines was not as consistent and heavy during the 1979-1984 time period as was the earlier use of the 7-foot mandril machines, so therefore there was not as much necessity to wipe off glue and therefore there was not as much TCE used. Nevertheless, when the 25-foot machines were in use, they consumed about one gallon of TCE per machine per shift, all of which evaporated in a manner identical to that described above pertaining to the 7-foot mandril machines.

11. Throughout all of my years of employment with Anco Products, I never observed any TCE pooled on the floor or flowing anywhere. All of the TCE utilized evaporated in the course of its usage.

12. TCE use was discontinued completely in the early to mid-80s, and since that time we have used alternative solvents. These alternative solvents are such things as citrus-based cleaners and Windex.

FURTHER AFFIANT SAYETH NOT.

I hereby swear or affirm under the penalties for perjury that the foregoing representations are true and correct to the best of my knowledge and belief.

Mary Wirt

Mary Wirt

Dated: 2-16-93

January 22, 1993

Mr Donn H. Wray
Plews & Shadley
1346 North Delaware Street
Indianapolis, IN 46202-2415

Dear Mr. Wray,

This morning, January 22, 1993, we interviewed one of our long time employees, Ms. Georgia Shephard. The purpose of this interview was to determine how the trichloroethylene which was purchased during the period prox. 1978 through 1985 was used and/or disposed of. The present management team including the foreman in the plant joined the company in the period between June and October 1981 so our knowledge of events prior to that time is limited and we must depend on the recollections of the few people now in our employ who were with the company at that time.

According to our interview with Ms. Shephard there were three mandrell type machines on which a liner or core material, wire and insulation, were applied and sprayed with an adhesive. The trichloroethylene was used to clean the glue off the mandrell, wire cutter and tools. She relates that the employees wore gloves and using a piece of insulation would dip it in the solvent and wipe or wash off those items indicated above. Since the solvent was highly volatile it evaporated off of the machines and the insulation which was disposed of in the normal manner. She was very clear in stating that the solvent was allowed to evaporate and that to the best of her knowledge none was ever disposed of in any other way.

It appears this process began operating at greatly reduced levels sometime in 1978 declining further through 1979 and 1980 and ceasing alltogether sometime before our arrival in 1981 at which time it was replaced by the 25' product produced on the core machines. From that time forward the limited amount of solvent purchased were used to wipe down and clean the hot melt core machine and mandrells. As indicated it appears our last purchase of the solvent was made sometime in 1985.

There is one more employee that we can interview, Mary Wirt, but she is on a short vacation and will not be returning until next week sometime.

Sincerely,
Anco Products, Inc.

Howard J. Tomlinson
President

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API ANCO PRODUCTS, INC.

February 8, 1993

Mr. Harry Ackerson
Indiana Department of Environmental Management
Site Investigation Section
106 South Meridian Street
Indianapolis, IN 46206

Ref: Information Sharing
CERCLIS SITES
Gemeinhardt and Bock Industries
Elkhart County
Elkhart, IN

Dear Mr. Ackerson,

As part of a recent review of our records we find that information provided to you previously on this subject was incorrect. I refer specifically to a letter dated July 21, 1991 and addressed to you from Mr. John C. Wallace, Inc., an environmental consultant working on our behalf.

Based on information available to us at that time Mr. Wallace stated in that letter and I quote, **"Anco Products, Inc. has never used Trichlorethylene (TCE) in their manufacturing processes, and ask that you assist them in determining the source and or the responsible party."** We find that this information is not correct, that in fact, Anco Products did use Trichlorethylene in their manufacturing processes and although the quantities are not large they were significant and we feel we are obligated to correct the record.

By way of explanation, on or about June 1, 1981 the former management of Anco Products, Inc. resigned enmass and at the same time established their own business manufacturing the same product in the city. The entire management group, including all of the administrative staff, plant supervisory personnel and a large number of the hourly employees left the company at that time. For a period of two months the company was operated by representatives of the parent company in St. Paul, Minnesota.

Mr. Gary Luft, the present Controller, was hired in August of 1981 and I took responsibility as President of Anco Products, Inc. in October in 1981. It was necessary to hire and train an entirely new administrative and supervisory group. Our knowledge of the activities of the company prior to our coming were very limited and no personnel remained with the company, other than a few production workers who had little knowledge of the period in question. An examination of our records made at the time Mr. Wallace wrote you and our knowledge of the processes and activities of the plant at that time indicated that Trichlorethylene was not used in any significant quantities nor was it a part of our regular production processes.

2500 South 17th Street • Elkhart, Indiana 46517
(219) 293-5574 • (800) 837-2626 • FAX (219) 295-6235

Ref: Information Sharing
CERCLIS SITES
Gemeinhardt and Bock Industries
Elkhart County
Elkhart, IN

As part of the review mentioned above, we discovered records dating back to 1979 confirming Anco purchases of quantities of Trichlorethylene. We have two production employees who were with the company at that time and based on their recollection we were told that the solvent was used to remove excess spray adhesive which had adhered to production equipment. This was accomplished by wiping the production equipment with the solvent. It is also their recollection that the solvent was all lost by means of evaporation and that no solvent was disposed of in liquid form.

Below you will find a summary of purchases of Trichlorethylene:

1979	1500	Gallons
1980	555	Gallons
1981	55	Gallons
1982	55	Gallons
1983	110	Gallons
1984	220	Gallons
1985	165	Gallons
	2600	Gallons Total (1979 - 1985)

***No purchases after the year of 1985.

Sincerely,
Anco Products, Inc.

Howard J. Tomlinson
President

cc: Gary Luft

Ashland Chemical
Trichlorethylene Summary

Date	Invoice #	P.O. #	Qty / Gallon	Amount	
3-11-77	050 435734	18147	330	7425	Old Address
7-20-79	050 895163	21773	500	169494	
8-24-79	050 953402	21961	500	169494	
10-11-79	050 031561	22232	500	169494	
	1979 TOTALS		1500 G	508482	
1-10-80	050 174477	22852	500	179088	
1-19-80	050 046866	22362	1 can	4000	
10-17-80	050 603223	24233	55	27397	
	1980 TOTALS		555	210485	
4-10-81	050 879451	25275	55	28770	
	1981 TOTALS		55	28770	
2-23-82	050 370823	27200	55	30486	
	1982 TOTALS		55	30486	
3-10-83	050 952610	6474	55	30760	
12-8-83	050 420224	6751	55	34225	
	1983 TOTALS		110	64985	
3-29-84	050 613942	6768	55	34225	
6-21-84	050 762439	6951	55	36304	
8-28-84	050 883302	7028	55	34304	
11-6-84	050 019676	7119	55	31796	
	1984 TOTALS		220	136629	
2-7-85	050 175073	7192	55	31796	
3-12-85	050 231789	7233	55	31796	
5-23-85	050 372436	7306	55	31796	
	1985 TOTALS		165	95388	
	TOTALS 1979-1985		2660 Gallons	$1075225	

© WILSON JONES COMPANY G7206 GREEN 7206 BUFF MADE IN U.S.A.

SEND REMITTANCE TO:

Ashland

RECEIVED MAR 24 1977

PO BOX 51787
CHICAGO ILLINOIS 60693

ASHLAND CHEMICAL COMPANY
A DIVISION OF ASHLAND OIL, INC.

PLEASE RETURN REMITTANCE ADVICE WITH YOUR PAYMENT.

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

CUSTOMER NUMBER			INVOICE NUMBER
50	065	047280	050 435734

ANCO PRODUCTS
1627 W COSHOCTON AVE
ELKHART IN 46514

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" [illegible] PLEASE HEREOF.

* TERMS: DISCOUNT DOES NOT APPLY TO FREIGHT OR TAXES.
PAYMENTS NOT MADE WITHIN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO A DELINQUENCY CHARGE BY THE SELLER.

006

OUR ORDER NO.	CAR NUMBER	CUSTOMER ORDER NO.	F.O.B.
23347			DESTINATION

CONSIGNEE	* TERMS		DATE SHIPPED	SHIPPED FROM
SAME	NET 30 DAYS	213	03-11-77	SOUTH BEND

SHIPPED VIA	INVOICE DATE
OUR CARRIER	03-18-77

DESCRIPTION	GROSS QTY.	CONT.	GRAVITY	TEMP.	NET QUANTITY	●	UNIT PRICE	AMOUNT
TRICHLOROETHYLENE DEG COLD/VAP	330	T/W			330.00	P	.22500	74.2

REMITTANCE ADVICE
PLEASE RETURN WITH
YOUR PAYMENT

Old address

● P = POUNDS
G = GALLONS
K = KILOGRAMS
H = CWT
T = TONS
E = EACH

IF PAID IN ACCORDANCE WITH THE ABOVE TERMS . . .
A DISCOUNT IN THE AMOUNT OF .00 WILL BE ALLOWED.

74.2

Pay as it is see if additional billing goes through.

TOTAL

ATTENTION DIRECTOR OF PURCHASING:

This is an acknowledgment of your purchase order and unless accompanying actual shipment of your order as stated herein, shall **NOT** constitute a commitment on **SELLER's** part to ship the product ordered. The price for all products ordered shall be the price in effect on the date of shipment for the quantity actually shipped.

This is a copy of your order as entered on our records. Should the above information be incorrect, please notify us promptly. Amounts not paid within specified terms are subject to a delinquency charge as determined by **SELLER.**

Ken Malus

SEE REVERSE SI
FOR
TERMS & CONDITI

THIS IS TO CERTIFY THAT THE ABOVE NAMED ARTICLES ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARK LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION, ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEP OF TRANSPORTATION.

WARNING: *Excessive inhaling of solvent vapor or prolonged contact with skin may be harmful.*

CASH SETTLEMENT	
CASH	
CHECKS	
C/M'S	
TOTAL	

NOTE: THE QUANTITY OF CONTAINERS BEING RECEIVED MAY NOT REFLECT THE AMOUNT OF CREDIT THAT WILL BE ISSUED. CREDIT WILL BE ISSUED UPON FURTHER INSPECTION AS TO REUSEABILITY.

5—CONTAINER I.D. NUMBERS
1.POLY CARBOYS
2.GLASS CARBOYS
3.DEL DRUM
4.DEL BOY
5.AL DRUMS
6.POLY/STEEL DRUMS
7.S/S DRUMS
8.STEEL DRUMS
9.GAS CYLINDE

METER READING:

Subject to correction of clerical errors

DELIVERED BY: Gene

RECEIVED BY:

ACKNOWLEDG

TAXES—Existing taxes or any additional tax levied by any governmental authority on products herein named shall be to account of the buyer.

✓ SALES TAX KEY
1=Taxable
2=Exempt
3=Hand Code

1—SPECIAL LINE CODE
2—MULTI-INVOICE CODE

3—DRUM DEPOSIT
0=No drum deposit
1=Drum deposit
2=Manual drum deposit
3=Ashland container incl.

4—HOW BILLED
E=Each H=CWT
G=Gallon T=Tons
P=Pounds

Ashland

ORDER NO. 60348

LOCAL PURCHASE ORDER

TERMS

REQUESTED SHIP DATE 7-18-79

ATTENTION DIRECTOR OF PURCHASING: Ship items shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provision. No other terms shall have effect unless in writing signed by Seller.

ORDERED	NET QUANTITY SHIPPED	PRICE	AMOUNT
3 Cans	1 Cans		
	6150		

QUANTITY RECEIVED	PRICE	AMOUNT
GAUGE DOOR		

TOTAL

Material contact will skin may be harmful

METER READING

OPENING

CLOSING

FINAL NUMBER

IMPORTANT

NUMBER

2 DRUMS

4 STEEL DRUMS

6 GAS CYLINDERS

METER READING

2 DRUMS

4 STEEL DRUMS

6 GAS CYLINDERS

Ashland

ORDER NO. 61436

(213)

ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the terms and conditions of this reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by a Seller.

USED FOR Cars	Temp.	NET QUANTITY SHIPPED	PRICE	AMOUNT
00	63	6150		

QUANTITY RECEIVED	PRICE	AMOUNT

TOTAL

Packages marked in accordance with the applicable regulations of the I.C.C.

...nged, contact with skin may be harmful.

AINER I.D. NUMBERS: 1. DEL BOY, 2. STEEL DRUMS, 3. CAL DRUMS, 4. POLY/STEEL DRUMS, 5. GAS CYLINDERS

METER READING

Terms named shall be to account of the buyer.

4 — HOW BILLED: E = Each, H = CWT, G = Gallon, T = Tons, P = Pounds

CUSTOMER'S COPY

CUSTOMER ORDER NUMBER	* TERMS	SHIPPED FROM	SHIPPED VIA
NONE	NET 30 DAYS	SOUTH BEND	OUR CARRIER

F.O.B.
DESTINATION

DATE SHIPPED
08-24-79

INVOICE DATE
08-27-79

CAR NO.

SALESMAN
006

ID NO.

OUR ORDER NO.
61436

213

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	*	UNIT PRICE	AMOUNT
TRICHLOROETHYLENE DEG COLD/VAP	500	T/H		6150.00	P	.26500	1,629.75
INDIANA SALES TAX				1629.75		.04000	65.19
							1,694.94

Ashland

ASHLAND CHEMICAL COMPANY
A DIVISION OF ASHLAND OIL, INC.

* BILLING UNITS: P = POUNDS, G = GALLONS, K = KILOGRAMS, H = CWT, T = TONS, E = EACH

INVOICE NUMBER		CUSTOMER NUMBER		
050 953402	50	065	047260	61436

PLEASE RETURN REMITTANCE ADVICE WITH YOUR PAYMENT

PAYMENTS NOT MADE WITHIN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO DELINQUENCY CHARGE BY SELLER.

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

REMIT TO: ASHLAND CHEMICAL COMPANY
PO BOX 91787
CHICAGO ILLINOIS

CUSTOMER ORDER NUMBER	* TERMS	SHIPPED FROM	SHIPPED VIA
NONE	NET 30 DAYS	SOUTH BEND	OUR CARRIER

F.O.B.
DESTINATION

DATE SHIPPED
10-11-79

INVOICE DATE
10-13-79

CAR NO.

SALESMAN
006

ID NO.

OUR ORDER NO.
62964

213

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY		UNIT PRICE	AMOUNT
TRICHLOROETHYLENE DEG COLD/VAP	500	T/W		6150.00	P	.26500	1,629.75
INDIANA SALES TAX				1629.75		.04000	65.19
							1,694.94

Ashland

ASHLAND CHEMICAL COMPANY
A DIVISION OF ASHLAND OIL, INC.

* BILLING UNITS: P = POUNDS, G = GALLONS, K = KILOGRAMS, H = CWT, T = TONS, E = EACH

INVOICE NUMBER			CUSTOMER NUMBER	
050 031561	50	065	047260	62964

PLEASE RETURN REMITTANCE ADVICE WITH YOUR PAYMENT

PAYMENTS NOT MADE WITHIN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO DELINQUENCY CHARGE BY SELLER.

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

REMIT TO:
ASHLAND CHEMICAL COMPANY
PO BOX 91787
CHICAGO ILLINOIS 60693

Ashland

ORDER NO. 63291

CUSTOMER ORDER NO. 11-15-79

REQUESTED SHIP DATE 10-22-79

TERMS NET 30

SHIPPED VIA OUR CARRIER

"ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by Seller."

CONTENDED or Cap.	Temp	NET QUANTITY SHIPPED	PRICE	AMOUNT
3		5		

QUANTITY RECEIVED	GAUGE	PRICE	AMOUNT

TOTAL

...nged, contact with skin may be harmful

...scribed, packaged, marked ... the applicable regulations of ...

CONTAINER I.D. NUMBERS	
1 CARBOYS	4 DEL BOX
2 SS CARBOYS	5 AL DRUMS
3 DRUM	6 STEEL DRUMS
	7 POLY/STEEL DRUMS
	8 SPRINGS
	9 GAS CYLINDERS

METER READING

...hereinnamed shall be to account of the buyer.

4—HOW BILLED E = Each, H = CWT, G = Gallon, T = Tons, P = Pounds

FOR

1 = Drum deposit
2 = Manual drum deposit

CUSTOMER'S COPY

CUSTOMER ORDER NUMBER	* TERMS	SHIPPED FROM	SHIPPED VIA
NONE	NET 30 DAYS	SOUTH BEND	OUR CARRIER

F.O.B. DESTINATION

DATE SHIPPED 10-19-79

INVOICE DATE 10-21-79

CAR NO.

SALESMAN 006

ID NO.

OUR ORDER NO. 63247

213

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	*	UNIT PRICE	AMOUNT
TOLUENE	1	CAN		5.00	G	4.00000	20.00
TRICLORETHANE 111 DEGRS COLD/V	1	CAN		5.00	G	8.00000	40.00
INDIANA SALES TAX				60.00		.04000	2.40
							62.40

Ashland

ASHLAND CHEMICAL COMPANY
A DIVISION OF ASHLAND OIL, INC.

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

* BILLING UNITS: P = POUNDS, G = GALLONS, K = KILOGRAMS, H = CWT, T = TONS, E = EACH

INVOICE NUMBER	CUSTOMER NUMBER		
050 046866	50	065	047260

63247

PLEASE RETURN REMITTANCE ADVICE WITH YOUR PAYMENT

PAYMENTS NOT MADE WITHIN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO DELINQUENCY CHARGE BY SELLER.

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

REMIT TO: ASHLAND CHEMICAL COMPANY
PO BOX 91787
CHICAGO ILLINOIS 60693

CUSTOMER ORDER NUMBER	TERMS	SHIPPED FROM	SHIPPED VIA
NONE	NET 30 DAYS	SOUTH BEND	OUR CARRIER

F.O.B.
DESTINATION

DATE SHIPPED
01-10-80

INVOICE DATE
01-13-80

CAR NO.

SALESMAN
006

ID NO.

OUR ORDER NO.
65286

213

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	*	UNIT PRICE	AMOUNT
TRICHLOROETHYLENE DEG COLD/VAP	500	T/W		6150.00	P	.28000	1,7
INDIANA SALES TAX				1722.00		.04000	
							1,790.88

Ashland

ASHLAND CHEMICAL COMPANY
A DIVISION OF ASHLAND OIL, INC.

* BILLING UNITS: P = POUNDS, G = GALLONS, K = KILOGRAMS, H = CWT, T = TONS, E = EACH

INVOICE NUMBER			CUSTOMER NUMBER	
050 174477	50	065	047260	

65286

PLEASE RETURN REMITTANCE ADVICE WITH YOUR PAYMENT

PAYMENTS NOT MADE WITHIN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO DELINQUENCY CHARGE SELLER.

CONSIGNEE
AMCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

AMCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

REMIT TO:
ASHLAND CHEMICAL COMPANY
PO BOX 91787
CHICAGO ILLINOIS 60693

INVOICE CODE 3—DRUM DEPOSIT
0 = No drum deposit
1 = Drum deposit
2 = Manual drum deposit
3 = Ashland container incl.

4—HOW BILLED
E = Each
G = Gallon
H = CWT
P = Pounds
T = Tons

(13)

ORDER NO. 65286 | DATE OF ORDER 11-8-80 | REQUESTED SHIP DATE 11-10-80 | TERMS NET 30 | DATE SHIPPED 11-10-80 | TANK NO.

ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by Seller.

QUANTITY SHIPPED	Temp	PRICE	AMOUNT
6150			

QUANTITY RECEIVED	PRICE	AMOUNT
TOTAL		

marked ations of

with skin may be harmful

METER READING

4. DEE BOX
5. DRUMS
6. POLY/STEEL DRUMS
7. S/S DRUMS
8. STEEL DRUMS
9. GAS CYLINDERS

Ashland

ORDER NO. 73596

DATE OF ORDER 10-14-80

REQUESTED SHIP DATE 10-16-80

TERMS

DATE SHIPPED 10-16-80

"ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by Seller."

DERED or Cap.	3	Temp	NET QUANTITY SHIPPED	PRICE	4	AMOUNT
	1		660			

GAUGE	D.O.T.	QUANTITY RECEIVED	PRICE	4	AMOUNT

TOTAL

ged contact with skin may be harmful.

1. CARBOYS 2. CARBOYS 3. DEL BOY 4. DEL BOY 5. ALDRUMS 6. POLY/STEEL DRUMS 7. S/S DRUMS 8. STEEL DRUMS 9. GAS CYLINDERS

METER READING

10-16

erein named shall be to account of the buyer.

4—HOW BILLED
E = Each H = CWT
G = Gallon T = Tons
P = Pounds

CUSTOMER'S COPY

3 = Ashland container incl.

CUSTOMER ORDER NUMBER	TERMS	SHIPPED FROM	SHIPPED VIA
4654	NET 30 DAYS	SOUTH BEND	OUR CARRIER

F.O.B. DESTINATION

DATE SHIPPED 10-16-80

INVOICE DATE 10-17-80

CAR NO.

SALESMAN 006

ID NO.

OUR ORDER NO. 73596

213

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	*	UNIT PRICE	AMOUNT
TRICHLORDETHYLENE DEG COLD/VAP	1	DRM		660.00	P	.37000	244.20
55 GAL REGULAR DRUM				1.00	E	20.00000	20.00
INDIANA SALES TAX				244.20		.04000	9.77
							273.97

REMITTANCE [illegible]

PLEASE [illegible]

YOUR PAY[illegible]

* BILLING UNITS: P = POUNDS G = GALLONS K = KILOGRAMS H = CWT T = TONS E = EACH

INVOICE NUMBER	CUSTOMER NUMBER			
050 603223	50	065	047260	

73596

[illegible] INDICATED [illegible] SELLER.

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

REMIT TO:
ASHLAND CHEMICAL COMPANY
PO BOX 91787
CHICAGO ILLINOIS 60693

5233 | NET 30 DAYS | SOUTH BEND | YOUR CARRIER

F.O.B.
DESTINATION

DATE SHIPPED
04-10-86

INVOICE DATE
04-11-86

CAR NO.

SALESMAN
006

ID NO.

OUR ORDER NO.
77930

215

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	*	UNIT PRICE	AMOUNT
TRICHLOROETHYLENE DEG COLD/VAP	1	DRM		660.00	P	.39000	257.40
55 GAL REGULAR DRUM				1.00	E	20.00000	20.00
INDIANA SALES TAX				257.40		.04000	10.30
							287.70

* BILLING UNITS: P = POUNDS, G = GALLONS, K = KILOGRAMS, H = CWT, T = TONS, E = EACH

INVOICE NUMBER	CUSTOMER NUMBER			
360 479451	50	065	047260	

77930

PLEASE RETURN REMITTANCE ADVICE WITH YOUR PAYMENT

PAYMENTS NOT MADE WITHIN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO DELINQUENCY CHARGE BY SELLER.

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

REMIT TO:
ASHLAND CHEMICAL COMPANY
PO BOX 91767
CHICAGO ILLINOIS 60693

Ashland

ORDER NO. 77930

DATE OF ORDER 4-8-86

REQUESTED SHIP DATE 4-10-86

DATE SHIPPED 4-10-86

TERMS NET 30

*ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by Seller.

ORDERED or Cap.	Temp	NET QUANTITY SHIPPED	PRICE	AMOUNT
1		660		

GAUGE D.O.T.	QUANTITY RECEIVED	PRICE	AMOUNT
		TOTAL	

described, packaged, marked and labeled, and in all respects in accordance with applicable regulations of

ed contact with skin may be harmful.

R.I.D. NUMBERS
PBOYS 4. DEL BOY
ARBOYS 3. ALDRUMS
M 6. POLY/STEEL DRUMS

1. S/S DRUMS
2. CONTAINERS
5. CELLOPACKS
8. GAS CYLINDERS

METER READING:

Rd Anco

ein named shall be to account of the buyer.

4—HOW BILLED
E = Each H = CWT
G = Gallon T = Tons
P = Pounds

3 = Hand Code

1 = Drum deposit
2 = Manual drum deposit
3 = Ashland container incl.

CUSTOMER'S COPY

Ashland

TANK NO.	ORDER No. 85781
(13)	OCO / DATE OF ORDER 2-18-82
DATE SHIPPED 2-24	TERMS 31 / REQUESTED SHIP. DATE 2-22-82

"ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by Seller."

ORDERED (Gs. or Cap.)	3	Temp.	NET QUANTITY SHIPPED	PRICE	4	AMOUNT
1	1		660			

SIZE	GAUGE	D.O.T.	QUANTITY RECEIVED	PRICE	4	AMOUNT
8			1	20.3		

described, packaged, marked
the applicable regulations of
110

TOTAL

onged contact with skin may be harmful.

TAINER I.D. NUMBERS
LY CARBOYS
ASS CARBOYS
L DRUM

4..DEL BOY
5..AL DRUMS
6..POLY/STEEL DRUMS

7..S/S DRUMS
8..STEEL DRUMS
9..GAS CYLINDERS

METER READING

s herein named shall be to account of the buyer.

4—HOW BILLED
E = Each H = CWT
G = Gallon T = Tons
P = Pounds

2 = Manual drum deposit

CUSTOMER ORDER NUMBER 5578

F.O.B. DESTINATION

DATE SHIPPED 02-24-82

INVOICE DATE 02-26-82

CAR NO.

SALESMAN 006

ID NO.

OUR ORDER NO. 85781

213

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

TERMS NET 30 DAYS

SHIPPED FROM SOUTH BEND

SHIPPED VIA OUR CARRIER

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY		UNIT PRICE	AMOUNT
TRICHLOROETHYLENE DEG COLD/VAP	1	DRM		660.00	P	.41500	273.90
55 GAL REGULAR DRUM				1.00	E	20.00000	20.00
INDIANA SALES TAX				273.90		.04000	10.96
REMIT/ARRANGE ABOVE PLEASE REMIT DIRECT TO YOUR PAYMENT							
							304.86

• BILLING UNITS: P = POUNDS G = GALLONS K = KILOGRAMS H = CWT T = TONS E = EACH

INVOICE NUMBER	CUSTOMER NUMBER
050 3703823	50 065 047263

CONSIGNEE
ANCO PRODUCTS
2500 S 12TH ST

ANCO PRODUCTS
2500 S 3
ELKHART 46514

85781

PAYMENTS NOT MADE IN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO DELINQUENCY CHARGE BY SELLER.

REMIT TO: ASHLAND CHEMICAL COMPANY
PO BOX 91757
CHICAGO ILLIN

Ashland®

ASHLAND CHEMICAL COMPANY

DIVISION OF ASHLAND OIL, INC.
INDUSTRIAL CHEMICALS AND SOLVENTS DIVISION

SALES ORDER - 9221A

TIME	DATE OF ORDER	ORDER NUMBER

CO. NO.	DIV	ORG	ACCOUNT NO.	DEST.	SLSM	SHIPPED VIA	SHIP FROM (CITY AND STATE)	FOB SHIP-1, DEST-2	FREIGHT PPD-1, COLL-2	SHIP CODE TC-1, LTL-2	TERMS	OCO	REQUESTED SHIP DATE

DATE SHIPPED	CUSTOMER ORDER AND REQ. NO.	TRUCK NO	TANK NO.	DELIVERED BY
3-10-93		1567		Bate

SHIP TO

ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by the seller.

THIS IS TO CERTIFY THAT THE BELOW NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

1	2	PRODUCT CODE	CONT. CODE	✓	HM	DESCRIPTION	QUANTITY ORD QUANTITY	UM	QTY/CTR	DRUM CODE	TEMP.	NET QUANTITY SHIPPED	BILLING QUANTITY
						DPM-A							

CUSTOMER ORDER NUMBER	• TERMS	SHIPPED FROM	SHIPPED VIA
1474	NET 30 DAYS	SOUTH BEND	OUR CARRIER

F.O.B. DESTINATION
DATE SHIPPED 03-10-93
INVOICE DATE 03-10-93
CAR NO.
SALESMAN 036
ID NO.
OUR ORDER NO. 05988
213

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	•	UNIT PRICE	AMOUNT
TRICHLOROETHYLENE DEG COLD/VAP	1	DRM		660.00	P	.41500	273.90
55 GAL REGULAR DRUM				1.00	E	20.00000	20.00
INDIANA SALES TAX				273.90		.05500	15.07
							307.60

• BILLING UNITS: P=POUNDS G=GALLONS K=KILOGRAMS H=CWT T=TONS E=EACH

INVOICE NUMBER	CUSTOMER NUMBER			
050 952610	50	065	047260	05988

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

REMIT TO: ASHLAND CHEMICAL COMPANY
PO BOX 91787
CHICAGO ILLINOIS 60693

Ashland®

ASHLAND CHEMICAL COMPANY
DIVISION OF ASHLAND OIL, INC.
INDUSTRIAL CHEMICALS AND SOLVENTS DIVISION

SALES ORDER - 9221A REGULAR ORDER

TIME	DATE OF ORDER	ORDER NUMBER
[illegible]	[illegible]	[illegible]

NO.	DIV	ORG	ACCOUNT NO.	DEST.	SLSM	SHIPPED VIA	SHIP FROM (CITY AND STATE)	FOB SHIP-1, DEST-2	FREIGHT PPD-1, COLL-2	SHIP CODE TC-1, LTL-2	TERMS	OCO	REQUESTED SHIP DATE
[illegible]	[illegible]	[illegible]	[illegible]		[illegible]		SOUTH BEND					N	[illegible]

DATE SHIPPED	CUSTOMER ORDER AND REQ. NO.	TRUCK NO.	TANK NO.	DELIVERED BY
10-8-83	[illegible]	7819		4403

SHIP TO ANCO PRODUCTS
[illegible]
[illegible]

ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by the seller.

THIS IS TO CERTIFY THAT THE BELOW NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

1	2	PRODUCT CODE	CONT. CODE	✓	HM	DESCRIPTION	QUANTITY ORD QUANTITY	UM	QTY/CTR	DRUM CODE	TEMP.	NET QUANTITY SHIPPED	BILLING QUANTITY
[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	TRICHLOROETHYLENE	1	DRM	[illegible]	1		[illegible]	[illegible]
						[illegible]							

CUSTOMER ORDER NUMBER: 4751
TERMS: NET 30 DAYS
SHIPPED FROM: SOUTH BEND
SHIPPED VIA: OUR CARRIER

F.O.B.	DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	•	UNIT PRICE	AMOUNT
DESTINATION	TRICHLOROETHYLENE DES COLD/VAP	1	DRM		660.00	P	.46500	306.90
DATE SHIPPED 12-04-83	55 GAL REGULAR DRUM				1.00	E	20.00000	20.00
INVOICE DATE 12-04-83	INDIANA SALES TAX				306.90		.05000	15.35
CAR NO.								
SALESMAN 006								
ID NO.								
OUR ORDER NO. 14939								
213								

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

• BILLING UNITS: P=POUNDS H=CWT G=GALLONS T=TONS K=KILOGRAMS E=EACH

342.25

INVOICE NUMBER	CUSTOMER NUMBER	
050-42024	50 065 04725	14939

PLEASE RETURN REMITTANCE ADVICE WITH YOUR PAYMENT

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

PAYMENTS NOT MADE WITHIN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO DELINQUENCY CHARGE BY SELLER.

REMIT TO:
ASHLAND CHEMICAL COMPANY
P.O. BOX 93263
CHICAGO, ILLINOIS 60673

Ashland

ASHLAND CHEMICAL COMPANY

DIVISION OF ASHLAND OIL, INC.
INDUSTRIAL CHEMICALS AND SOLVENTS DIVISION

LES ORDER - 9221A

TIME	DATE OF ORDER	ORDER NUMBER

NO.	DIV	ORG	ACCOUNT NO.	DEST.	SLSM	SHIPPED VIA	SHIP FROM (CITY AND STATE)	FOB SHIP-1, DEST-2	FREIGHT PPD-1, COLL-2	SHIP CODE TC-1, LTL-2	TERMS	OCO	REQUESTED SHIP DATE

DATE SHIPPED	CUSTOMER ORDER AND REQ. NO.	TRUCK NO.	TANK NO.	DELIVERED BY
3-27-94				

SHIP TO
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by the seller.

THIS IS TO CERTIFY THAT THE BELOW NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

1	2	PRODUCT CODE	CONT. CODE	✓	HM	DESCRIPTION	QUANTITY ORD QUANTITY	UM	QTY/CTR	DRUM CODE	TEMP.	NET QUANTITY SHIPPED	BILLING QUANTITY
						TRICHLOROETHYLENE							

FOB	DATE SHIPPED	INVOICE DATE	CAR NO.	SALESMAN	PO NO.	OUR ORDER NO.
	03-29-94	03-29-94				18795

DESTINATION

INDIANA SALES TAX

55 GAL REGULAR DRUM

00230d

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	UNIT PRICE	AMOUNT
TRICHLOROETHYLENE DEG COLD/VAP	1	DRM		660.00 P	.46500	306.90
				1.00 E	20.00000	20.00
				306.90	.05000	15.35

NET 30 DAYS | SOUTH BEND | OUR CARRIER

REMITTANCE ADVICE
PLEASE RETURN WITH
YOUR PAYMENT

342.25

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

• BILLING UNITS: P = POUNDS, G = GALLONS, K = KILOGRAMS, H = CWT, T = TONS, E = EACH

INVOICE NUMBER	CUSTOMER NUMBER	
050 6394 2	50 065 047260	18795

REMIT AND ADVISE WITH YOUR PAYMENT

PAYMENTS NOT MADE WITHIN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO DELINQUENCY CHARGE BY SELLER.

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

REMIT TO:
ASHLAND CHEMICAL COMPANY
P.O. BOX 93263
CHICAGO, ILLINOIS 60673

Ashland

ASHLAND CHEMICAL COMPANY

DIVISION OF ASHLAND OIL, INC.
INDUSTRIAL CHEMICALS AND SOLVENTS DIVISION

SALES ORDER - 9221A

TIME	DATE OF ORDER	ORDER NUMBER

CO. NO.	DIV	ORG	ACCOUNT NO.	DEST.	SLSM	SHIPPED VIA	SHIP FROM (CITY AND STATE)	FOB SHIP-1, DEST-2	FREIGHT PPD-1, COLL-2	SHIP CODE TC-1, LTL-2	TERMS	OCO	REQUESTED SHIP DATE

DATE SHIPPED	CUSTOMER ORDER AND REQ. NO.	TRUCK NO.	TANK NO.	DELIVERED BY
6-21-94				

SHIP TO

ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by the seller.

THIS IS TO CERTIFY THAT THE BELOW NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

1	2	PRODUCT CODE	CONT. CODE	✓	HM	DESCRIPTION	QUANTITY ORD QUANTITY	UM	QTY/CTR	DRUM CODE	TEMP.	NET QUANTITY SHIPPED	BILLING QUANTITY
						ORM-A							

[redacted]

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

REMIT TO:
ASHLAND CHEMICAL COMPANY
P.O. BOX 93253
CHICAGO, ILLINOIS 60673

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

INVOICE NUMBER	CUSTOMER NUMBER				
050 762439	50	065	047250	2463	

PAYMENTS NOT MADE WITHIN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO DELINQUENCY CHARGE BY SELLER.

CUSTOMER ORDER NUMBER: 6951
F.O.B.: DESTINATION
DATE SHIPPED: 06-21-94
INVOICE DATE: 06-21-94
CAR NO.:
SALESMAN: 005
ID NO.:
OUR ORDER NO.: 2463
213

THIS SALE IS SUBJECT TO THE TERMS AND CONDITIONS SHOWN ON THE REVERSE SIDE HEREOF.

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

• BILLING UNITS: P=POUNDS G=GALLONS K=KILOGRAMS T=TONS H=CWT E=EACH

TERMS: NET 30 DAYS
SHIPPED FROM: SOUTH BEND
SHIPPED VIA: OUR CARRIER

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	•	UNIT PRICE	AMOUNT
TRICHLOROETHYLENE DEG COLD/VAP	1	DRM		660.00	P	.49500	326.70
55 GAL REGULAR DRUM				1.00	E	20.00000	20.00
INDIANA SALES TAX				326.70		.05000	16.34
							343.04

HEMIDANGE ADVICE
PLEASE INITIATE WITH
YOUR PAYMENT

Ashland®

ASHLAND CHEMICAL COMPANY
DIVISION OF ASHLAND OIL, INC.
INDUSTRIAL CHEMICALS AND SOLVENTS DIVISION

SALES ORDER - 9221A REGULAR ORDER

TIME	DATE OF ORDER	ORDER NUMBER
[illegible]	[illegible]	[illegible]

O. NO.	DIV	ORG	ACCOUNT NO.	DEST.	SLSM	SHIPPED VIA	SHIP FROM (CITY AND STATE)	FOB SHIP-1, DEST-2	FREIGHT PPD-1, COLL-2	SHIP CODE TC-1, LTL-2	TERMS	OCO	REQUESTED SHIP DATE
55	50	065	0472600		006		SOUTH BEND		1				

DATE SHIPPED	CUSTOMER ORDER AND REQ NO.	TRUCK NO.	TANK NO.	DELIVERED BY
8-28-84	7028	7567		Self

SHIP TO
ANCO PRODUCTS
2500 S. 17TH ST
ELKHART IN 46514

ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by the seller.

THIS IS TO CERTIFY THAT THE BELOW NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

1	2	PRODUCT CODE	CONT. CODE	✓	HM	DESCRIPTION	QUANTITY ORD QUANTITY	UM	QTY/CTR	DRUM CODE	TEMP.	NET QUANTITY SHIPPED	BILLING QUANTITY
		[illegible]	[illegible]			[illegible] OPM: A	1	[illegible]	[illegible]	1		1	

TERMS: NET 30 DAYS SHIPPED FROM: SOUTH BEND VIA: OUR TRUCK

CUSTOMER ORDER NUMBER: 7028
F.O.B.: DESTINATION
DATE SHIPPED: 08-28-84
INVOICE DATE: 08-28-84
CAR NO.
SALESMAN: 006
ID NO.
OUR ORDER NO.: 23937
213

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	•	UNIT PRICE	AMOUNT
TRICHLOROETHYLENE DEG COLD/VAP	1	DRM		660.00	P	.49500	326.70
55 GAL REGULAR DRUM				1.00	E	20.00000	20.00
INDIANA SALES TAX				326.70		.05000	16.34
							363.04

EMERGENCY

SEP 1984 RECEIVED

THIS SALE IS SUBJECT TO THE TERMS AND CONDITIONS SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

• BILLING UNITS: P = POUNDS, G = GALLONS, K = KILOGRAMS, H = CWT, T = TONS, E = EACH

INVOICE NUMBER	CUSTOMER NUMBER			
050 883302	50	065	047260	23937

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

REMIT TO: ASHLAND CHEMICAL COMPANY
PO BOX 93263
CHICAGO, IL 60673

Ashland

ASHLAND CHEMICAL COMPANY

DIVISION OF ASHLAND OIL, INC.
INDUSTRIAL CHEMICALS AND SOLVENTS DIVISION

SALES ORDER - 9221A REGULAR ORDER

CO. NO.	DIV	ORG	ACCOUNT NO.	DEST.	SLSM	SHIPPED VIA
5	50	065	0472600		006	

SHIP FROM (CITY AND STATE): SOUTH BEND

DATE SHIPPED: 11-6

CUSTOMER ORDER AND REQ. NO: 7119

TIME | DATE OF ORDER | ORDER NUMBER

FOB: SHIP-1, DEST-2 | FREIGHT: PPD-1, COLL-2 | SHIP CODE: TC-1, LTL-2 | TERMS | OCO: N | REQUESTED SHIP DATE

TRUCK NO. | TANK NO. | DELIVERED BY: PU

SHIP TO
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by the seller.

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1	2	PRODUCT CODE	CONT. CODE	✓	HM	DESCRIPTION	QUANTITY ORD QUANTITY	UM	QTY/CTR	DRUM CODE	TEMP.	NET QUANTITY SHIPPED	BILLING QUANTITY
		30000500	004		X	111 TRICHLORETHANE DRM-A	1	E500#	1			1.00	

CUSTOMER ORDER NUMBER: 7119
* TERMS: NET 30 DAYS
SHIPPED FROM: SOUTH BEND
SHIPPED VIA: OUR CARRIER

F.O.B.: DESTINATION
DATE SHIPPED: 11-06-84
INVOICE DATE: 11-06-84
CAR NO.:
SALESMAN: 006
ID NO.:
OUR ORDER NO.: 26351

213

ORIGINAL INVOICE

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	*	UNIT PRICE	AMOUNT
TRICHLORETHAN 111 DEGRS COLD/V	1	DRM		588.00	P	.51500	302.82
55 GAL REGULAR DRUM				1.00	E	20.00000	20.00
INDIANA SALES TAX				302.82		.05000	15.14
							337.96

RECEIVED NOV 1984

* BILLING UNITS P = POUNDS G = GALLONS K = KILOGRAMS M = CUBIC FT T = TONS E = EACH

	CUSTOMER NUMBER			
019676	50	065	047260	26351

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

PLEASE RETURN REMITTANCE ADVICE WITH YOUR PAYMENT

PAYMENTS NOT MADE WITHIN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO LATE PAYMENT CHARGE BY SELLER.

REMIT TO: ASHLAND CHEMICAL COMPANY
PO BOX 93263
CHICAGO, IL 60673

ORDER - 9221A

DIV	ORG	ACCOUNT NO.	DEST.	SLSM	SHIPPED VIA
20	205	2472020		008	

ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

SHIP FROM (CITY AND STATE): SOUTH BEND
SHIP-1, DEST-2 | PPD-1, COLL-2: 1
TRUCK NO.: 7867
TANK NO.:
DELIVERED BY:

DATE SHIPPED: 2-7-85
CUSTOMER ORDER AND REQ. NO.: 7192

ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by the seller.

THIS IS TO CERTIFY THAT THE BELOW NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED, AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.

2	PRODUCT CODE	CONT. CODE	✓	HM	DESCRIPTION	QUANTITY ORD QUANTITY	UM	QTY/CTR	DRUM CODE	TEMP.	NET QUANTITY SHIPPED	BILLING QUANTITY
	2060500	244	✓		111 TRICHLOROETHANE DRM-A	1	EACH	1			1.00	500.00

CUSTOMER ORDER NUMBER: 7192
TERMS: NET 30 DAYS
SHIPPED FROM: SOUTH BEND
SHIPPED VIA: OUR CARRIER

P.O.B.: DESTINATION
DATE SHIPPED: 02-07-85
INVOICE DATE: 02-07-85
CAR NO.:
SALESMAN: 006
ID NO.:
OUR ORDER NO.: 29085

213

ORIGINAL INVOICE

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY		UNIT PRICE	AMOUNT
TRICHLORETHAN 111 DEGRS COLD/V	1	DRM		588.00	P	.51500	302.82
55 GAL REGULAR DRUM				1.00	E	20.00000	20.00
INDIANA SALES TAX				302.82		.05000	15.14
							337.96

FEB 1985 RECEIVED

* BILLING UNITS: P = POUNDS, G = GALLONS, K = KILOGRAMS, H = CWT, T = TONS, E = EACH

INVOICE NUMBER	CUSTOMER NUMBER			
050 175073	50	065	047260	

29085

PAYMENTS NOT MADE IN THE TERMS AND CONDITIONS INDICATED ARE SUBJECT TO LATE PAYMENT CHARGE BY SELLER.

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

REMIT TO: ASHLAND CHEMICAL COMPANY
PO BOX 93263
CHICAGO

ASHLAND CHEMICAL COMPANY

DIVISION OF ASHLAND OIL, INC.
INDUSTRIAL CHEMICALS AND SOLVENTS DIVISION

SALES ORDER - 9221A

CO. NO.	DIV	ORG	ACCOUNT NO.	DEST.	SLSM	SHIPPED VIA	SHIP FROM (CITY AND STATE)	FOB SHIP-1, DEST-2	FREIGHT PPD-1, COLL-2	SHIP CODE TC-1, LTL-2	TERMS	OCO	REQUESTED SHIP DATE
5	50	[illegible]	[illegible]		[illegible]		[illegible]		1				[illegible]

TIME	DATE OF ORDER	ORDER NUMBER
[illegible]	[illegible]	

DATE SHIPPED	CUSTOMER ORDER AND REQ. NO.	TRUCK NO.	TANK NO.	DELIVERED BY
	[illegible]			

SHIP TO
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by the seller.

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1	2	PRODUCT CODE	CONT. CODE	✓	HM	DESCRIPTION	QUANTITY ORD QUANTITY	UM	QTY/CTR	DRUM CODE	TEMP.	NET QUANTITY SHIPPED	BILLING QUANTITY
		3000520	241		X	111 TRICHLOROETHANE DRM-A	1	LB	538	1		[illegible]	[illegible]

CUSTOMER ORDER NUMBER	TERMS	SHIPPED FROM	SHIPPED VIA
7233	NET 30 DAYS	SOUTH BEND	OUR CARRIER

F.O.B.	DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY	*	UNIT PRICE	AMOUNT
DESTINATION	TRICHLORETHAN 111 DEGRS COLD/V	1	DRM		538.00	P	.51500	302.82
DATE SHIPPED 03-12-85	55 GAL REGULAR DRUM				1.00	E	20.00000	20.00
INVOICE DATE 03-12-85	INDIANA SALES TAX				302.82		.05000	15.14
CAR NO.								
SALESMAN 006								
ID NO.								
OUR ORDER NO. 30030								
213								

THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF

PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

* BILLING UNITS: P=POUNDS G=GALLONS K=KILOGRAMS H=CWT T=TONS E=EACH

337.96

RECEIVED MAR 1985

INVOICE NUMBER	CUSTOMER NUMBER			
050 231789	50	065	047260	30030

FREIGHTS NOT MAD [illegible] AND CONDITIONS INDICATED ON SHIPPER [illegible] ADVANCE CHARGE BY [illegible]

CONSIGNEE
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

REMIT TO: ASHLAND CHEMICAL COMPANY
PO BOX 93263
CHICAGO, IL 60673

ASHLAND CHEMICAL COMPANY

DIVISION OF ASHLAND OIL, INC.
INDUSTRIAL CHEMICALS AND SOLVENTS DIVISION

PAGE: 1

SALES ORDER - 9221A REGULAR ORDER 00011

TIME	DATE OF ORDER	ORDER NUMBER
10:14	05/22/85	32142

NO.	DIV	ORG	ACCOUNT NO.	DEST.	SLSM	SHIPPED VIA	SHIP FROM (CITY AND STATE)	FOB SHIP-1, DEST-2	FREIGHT PPD-1, COLL-2	SHIP CODE TC-1, LTL-2	TERMS	OCO	REQUESTED SHIP DATE
5	50	065	047260		006		SOUTH BEND	2	1	2	81	N	05/23/85

DATE SHIPPED	CUSTOMER ORDER AND REQ. NO.	TRUCK NO.	TANK NO.	DELIVERED BY
5-23-85	7306	7867		

SHIP TO
ANCO PRODUCTS
2500 S 17TH ST
ELKHART IN 46514

ATTENTION DIRECTOR OF PURCHASING: All shipments shall be governed by the Terms and Conditions on the reverse side. Acceptance of delivery shall be deemed acceptance of such provisions. No other terms shall have effect unless in writing signed by the seller.

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1	2	PRODUCT CODE	CONT. CODE	✓	HM	DESCRIPTION	QUANTITY ORD QUANTITY	UM	QTY/CTR	DRUM CODE	TEMP.	NET QUANTITY SHIPPED	BILLING QUANTITY
		[illegible]	[illegible]	✓	Y	1,1,1 TRICHLOROETHANE [illegible] DRM-A	1	EA	[illegible]				

CUSTOMER ORDER NUMBER 7306
F.O.B. DESTINATION
DATE SHIPPED 05-23-85
INVOICE DATE 05-23-85
CAR NO.
SALESMAN 006
ID NO.
OUR ORDER NO. 32142
213
ORIGINAL INVOICE
THIS SALE IS SUBJECT TO THE "TERMS AND CONDITIONS" SHOWN ON THE REVERSE SIDE HEREOF
PLEASE REFER TO THIS NUMBER ON ALL CORRESPONDENCE

TERMS NET 30 DAYS
SHIPPED FROM SOUTH BEND
SHIPPED VIA OUR CARRIER

DESCRIPTION	QUANTITY ORDERED	CONT.	TEMP.	NET QUANTITY		UNIT PRICE	AMOUNT
TRICHLORETHAN 111 DEGRS COLD/V	1	DRM		588.00	P	.51500	302.82
55 GAL REGULAR DRUM				1.00	E	20.00000	20.00
INDIANA SALES TAX				302.82		.05000	15.14
							337.96

RECEIVED MAY 1985

BILLING UNITS: P = POUNDS, G = GALLONS, K = KILOGRAMS, H = CWT, T = TONS, E = EACH

INVOICE NUMBER		CUSTOMER NUMBER	
050 372436	50	065	047260

32142

ANCO PRODUCTS
2500 S 17TH
ELKHART IN 46514

CONSIGNEE
O PRODUCTS
2500 S 17TH ST IN 46514

REMIT TO: ASHLAND CHEMICAL COMPANY
PO BOX 93263
CHICAGO, IL 6067

6

Air Quality Permit Status Search

Search Results

Please click on the permit number to return further details on that specific source and permit.
To sort results select **Permit Type**, **Permit Status**, or **Status Date**.

1-10 | next | out of 93 | Revise Search

Source Name: Anco Products Inc
Source ID: 039-00069
Source Location: 2500 S 17th St Elkhart IN 46517
County: Elkhart

Permit #	Permit Type Permit Sub-Type	Permit Status	Status Date
039-28476-00069	Title V Significant Permit Modification	Issued	04/27/2010
039-24991-00069	Title V Administrative Amendment	Withdrawn	08/02/2007
039-17563-00069	Title V Renewal	Issued	06/21/2007
039-24665-00069	Undetermined	Combined	05/01/2007
039-24295-00069	Title V Administrative Amendment	Issued	02/21/2007
039-20097-00069	Title V Administrative Amendment	Issued	09/21/2005
039-13210-00069	Title V Reopen - Cont. vs Intermittent Compliance	Issued	12/18/2001
039-9008-00069	Title V	Issued	12/31/1998
039-8111-00069	FESOP Minor Permit Revision	Issued	08/02/1997
039-6389-00069	FESOP	Issued	12/12/1996

1-10 | next | out of 93 | Revise Search

IDEM Home | Air Quality Home

IDEM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

SENT VIA U.S. MAIL: CONFIRMED DELIVERY AND SIGNATURE REQUESTED

TO: Andrew McCleery
GM
Anco Products, Inc.
2500 S. 17th St.
Elkhart IN 46517

DATE: Apr. 27, 2010

FROM: Matt Stuckey, Branch Chief
Permits Branch
Office of Air Quality

SUBJECT: Final Decision
Significant Permit Modification
039-28476-00069

Enclosed is the final decision and supporting materials for the air permit application referenced above. Please note that this packet contains the original, signed, permit documents.

The final decision is being sent to you because our records indicate that you are the contact person for this application. However, if you are not the appropriate person within your company to receive this document, please forward it to the correct person.

A copy of the final decision and supporting materials has also been sent via standard mail to:
Randy Martin Safety & Environmental Services, Inc.
OAQ Permits Branch Interested Parties List

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178, or toll-free at 1-800-451-6027 (ext. 3-0178), and ask to speak to the permit reviewer who prepared the permit. If you think you have received this document in error, please contact Joanne Smiddie-Brush of my staff at 1-800-451-6027 (ext 3-0185), or via e-mail at jbrush@idem.IN.gov.

Final Applicant Cover letter.dot 11/30/07

IDEM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: April 27, 2010

RE: Anco Products, Inc. / 039-28476-00069

FROM: Matthew Stuckey, Branch Chief
Permits Branch
Office of Air Quality

Notice of Decision: Approval – Effective Immediately

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 IC 13-17-3-4 and 326 IAC 2, this permit modification is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require 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 Environmental Adjudication, 100 North Senate Avenue, Government Center North, Suite N 501E, Indianapolis, IN 46204, **within eighteen (18) days of 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.

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IDEM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Mr. Andy McCleery
Anco Products, Inc.
2500 South 17th Street
Elkhart, IN 46517

Apr. 27, 2010

Re: 039-28476-00069
1st Significant Permit Modification to:
Part 70 permit No.: T 039-17563-00069

Dear Mr. McCleery:

Anco Products, Inc. was issued Part 70 operating permit T 039-28476-00069 on June 21, 2007, for a stationary fiberglass insulation production source. A letter requesting changes to this permit was received on September 11, 2009. Pursuant to the provisions of 326 IAC 2-7-12 a significant permit modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification involves the deletion of VOC and PM testing requirements for an existing curing oven, and associated changes to compliance monitoring conditions.

All other conditions of the permit shall remain unchanged and in effect. Please find enclosed the entire revised permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act – IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, MC 61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, or call at (800) 451-6027, and ask for Madhurima Moulik or extension (3-0868), or dial (317) 233-0868.

Sincerely,

Chrystal Wagner, Section Chief
Permits Branch
Office of Air Quality

Attachments

MDM
cc: File - Elkhart County
Elkhart County Health Department
Air Compliance and Enforcement

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.

Mitchell E. Daniels Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

PART 70 OPERATING PERMIT RENEWAL
OFFICE OF AIR QUALITY

Anco Products, Inc.
2500 S 17th Street
Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-17563-00069	
Issued by: *Original document signed by* Nisha Sizemore, Chief Permits Branch Office of Air Quality	Issuance Date: June 21, 2007 Expiration Date: June 21, 2012

1st Significant Permit Modification No.: 039-28476-00069	
Issued by: Chrystal Wagner, Section Chief Permits Branch Office of Air Quality	Issuance Date: Apr. 27, 2010 Expiration Date: June 21, 2012

C.18 General Record Keeping Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-6]
C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]
C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

D.1.1 Particulate [326 IAC 6-3-2]
D.1.2 Preventive Maintance Plan [326 IAC 2-7-5(13)]
D.1.3 Particulate
D.1.4 Thermal Oxidizer
D.1.5 Visible Emissions Notations
D.1.6 Weekly Inspections
D.1.7 Failure Detection
D.1.8 Record Keeping Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

D.2.1 Particulate [326 IAC 6-3-2]
D.2.2 Particulate [326 IAC 6-3-2]
D.2.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]
D.2.4 Particulate

Certification
Emergency Occurrence Report
Quarterly Deviation and Compliance Monitoring Report

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

B.8 Certification [326 IAC 2-7-4(f)][326 IAC 2-7-6(1)][326 IAC 2-7-5(3)(C)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by the "responsible official" of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification. One (1) certification may cover multiple forms in one (1) submittal.

(c) The "responsible official" is defined at 326 IAC 2-7-1(34).

B.9 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

IDEM Northern Regional Office
220 West Colfax Avenue, Suite 200
South Bend, Indiana 46601-1634

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) The Permittee seeking to establish the occurrence of an emergency shall make records available upon request to ensure that failure to implement a PMP did not cause or contribute to an exceedance of any limitations on emissions. However, IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.13 Prior Permits Superseded [326 IAC 2-1.1-9.5][326 IAC 2-7-10.5]

(a) All terms and conditions of permits established prior toT039-17563-00069 and issued pursuant to permitting programs approved into the state implementation plan have been either:

(1) incorporated as originally stated,

(2) revised under 326 IAC 2-7-10.5, or

(3) deleted under 326 IAC 2-7-10.5.

(b) All previous registrations and permits are superseded by this permit.

B.14 Termination of Right to Operate [326 IAC 2-7-10][326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)][326 IAC 2-7-8(a)][326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 Operating Permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:

submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.19 Operational Flexibility [326 IAC 2-7-20][326 IAC 2-7-10.5]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b),(c), or (e) without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;

(3) The changes do not result in emissions which exceed the limitations provided in this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site, on a rolling five (5) year basis, which document all such changes and emission trades that are subject to 326 IAC 2-7-20(b),(c), or (e). The Permittee shall make such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ in the notices specified in 326 IAC 2-7-20(b)(1), (c)(1), and (e)(2).

permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.

(b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.24 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314] [326 IAC 1-1-6]

For the purpose of submitting compliance certifications or establishing whether or not the Permittee has violated or is in violation of any condition of this permit, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether the Permittee would have been in compliance with the condition of this permit if the appropriate performance or compliance test or procedure had been performed.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
MC 61-52 IGCN 1003
Indianapolis, Indiana 46204-2251

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

C.11 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.12 Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) When required by any condition of this permit, an analog instrument used to measure a parameter related to the operation of an air pollution control device shall have a scale such that the expected maximum reading for the normal range shall be no less than twenty percent (20%) of full scale.

(b) The Permittee may request that the IDEM, OAQ approve the use of an instrument that does not meet the above specifications provided the Permittee can demonstrate that an alternative instrument specification will adequately ensure compliance with permit conditions requiring the measurement of the parameters.

Corrective Actions and Response Steps [326 IAC 2-7-5][326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on February 3, 1999.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level.
[326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

C.15 Response to Excursions or Exceedances [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) Upon detecting an excursion or exceedance, the Permittee shall restore operation of the emissions unit (including any control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) Pursuant to 326 IAC 2-6-3(a)(1), the Permittee shall submit by July 1 of each year an emission statement covering the previous calendar year. The emission statement shall contain, at a minimum, the information specified in 326 IAC 2-6-4(c) and shall meet the following requirements:

(1) Indicate estimated actual emissions of all pollutants listed in 326 IAC 2-6-4(a);

(2) Indicate estimated actual emissions of regulated pollutants as defined by 326 IAC 2-7-1 (32) ("Regulated pollutant, which is used only for purposes of Section 19 of this rule") from the source, for purpose of fee assessment.

The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue
MC 61-50 IGCN 1003
Indianapolis, Indiana 46204-2251

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

C.18 General Record Keeping Requirements[326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

(a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) production line with a natural gas fired curing oven, designated as ID A-1 and constructed in 1955, with a maximum rated burner capacity of 1.0 million British thermal units per hour, producing up to 1,630 pounds fiberglass insulation per hour. Particulate emissions are controlled by a gravity settling chamber, a dry prefilter chamber, and a fume thermal oxidizer (12.5 million British thermal units per hour maximum rated capacity) in series, exhausting through stack A.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the curing oven shall not exceed 3.57 pounds per hour when operating at a process weight rate of 1,630 pounds per hour.

This emission limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Preventive Maintance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for oven curing and its control devices.

Compliance Determination Requirements

D.1.3 Particulate

(a) In order to comply with condition D.1.1 and C.2, the dry prefilter chamber and gravity settling chamber shall be in operation at all times the curing oven is in operation.

(b) In order to comply with condition D.1.1 and C.2, the thermal oxidizer shall be in operation at all times the curing oven is in operation and a phenol - formaldehyde based binder is being used.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)][326 IAC 2-7-5(1)]

D.1.4 Thermal Oxidizer

When using a phenol-formaldehyde based binder:

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. Continuous monitoring shall mean at least one (1) reading each minute. The output of this system shall be recorded as a three-hour average. The Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three-hour average temperature of the thermal oxidizer is below 880°F. A three-hour average temperature that is below 880°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, when using the phenol-formaldehyde binder, the Permittee shall maintain continuous temperature records (on a three-hour average basis) for the thermal oxidizer and the three-hour average temperature used to demonstrate compliance during the most recent compliant stack test

(b) To document compliance with Condition D.1.5, the Permittee shall maintain records of the once per shift visible emission notations of the cure oven stack exhaust and the ventilation roof stack exhausting the cure oven production line. The Permittee shall include in their once per shift record when a visible emission notation is not taken and the reason for the lack of visible emission notation (i.e. the process did not operate that day).

(c) To document compliance with Condition D.1.6, the Permittee shall maintain records of the inspections and ductwork cleaning required under Condition D.1.6.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Compliance Determination Requirements

D.2.4 Particulate

The dust cage (dry filter) on the pneumatic conveyor, the dry filters on the matte cooling segment, and the baghouse on the forming chamber, shall be in operation at all times that these units are in operation.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, Indiana 46204-2251
Phone: 317-233-0178
Fax: 317-233-6865

PART 70 OPERATING PERMIT
EMERGENCY OCCURRENCE REPORT

Source Name:	Anco Products, Inc.
Source Address:	2500 S 17th Street, Elkhart, IN 46517
Mailing Address:	2500 S 17th Street, Elkhart, IN 46517
Part 70 Permit No.:	T039-17563-00069

This form consists of 2 pages **Page 1 of 2**

☐ This is an emergency as defined in 326 IAC 2-7-1(12)

X The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-0178, ask for Compliance Section); and

X The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-6865), and follow the other requirements of 326 IAC 2-7-16.

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Anco Products, Inc.
Source Address: 2500 S 17th Street, Elkhart, IN 46517
Mailing Address: 2500 S 17th Street, Elkhart, IN 46517
Part 70 Permit No.: T039-17563-00069

Months: _____ **to** _____ **Year:** _____

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(1) This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. A deviation required to be reported pursuant to an applicable requirement that exists independent of the permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

☐ NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

☐ THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Permit Modification

Source Description and Location

Source Name:	Anco Products, Inc.
Source Location:	2500 S 17th Street, Elkhart, IN 46517
County:	Elkhart
SIC Code:	3296 and 3444
Operation Permit No.:	T 039-17563-00069
Operation Permit Issuance Date:	June 21, 2007
Significant Permit Modification No.:	039-28476-00069
Permit Reviewer:	Madhurima D. Moulik

Existing Approvals

The source was issued Part 70 Operating Permit (1st Renewal) No. T 039-17563-00069 on June 21, 2007.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Designation
SO_2	Better than national standards.
CO	Unclassifiable or attainment effective November 15, 1990.
O_3	Attainment effective July 19, 2007, for the 8-hour ozone standard.[1]
PM_{10}	Unclassifiable effective November 15, 1990.
NO_2	Cannot be classified or better than national standards.
Pb	Not designated.

[1]Attainment effective October 18, 2000, for the 1-hour ozone standard for the South Bend-Elkhart area, including Elkhart County, and is a maintenance area for the 1-hour National Ambient Air Quality Standards (NAAQS) for purposes of 40 CFR 51, Subpart X*. The 1-hour standard was revoked effective June 15, 2005.
Unclassifiable or attainment effective April 5, 2005, for PM2.5.

Note: On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(a) Ozone Standards

(1) On October 25, 2006, the Indiana Air Pollution Control Board finalized a rule revision to 326 IAC 1-4-1 revoking the one-hour ozone standard in Indiana.

(2) On September 6, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Allen, Clark, Elkhart, Floyd, LaPorte, and St. Joseph counties as attainment for the 8-hour ozone standard.

(3) On November 9, 2007, the Indiana Air Pollution Control Board finalized a temporary emergency rule to re-designate Boone, Hamilton, Hancock, Hendricks, Johnson, Madison, Marion, Morgan and Shelby counties as attainment for the 8-

Permit Level Determination – Part 70

The modification will be incorporated into the Part 70 Operating Permit through a significant permit modification issued pursuant to 326 IAC 2-7-12, as the modification involves significant changes in the permit terms and conditions.

Federal Rule Applicability Determination

There are no changes to federal rule applicabilities.

State Rule Applicability Determination

There are no changes to the state rule applicabilities.

Compliance Determination and Monitoring Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with all applicable state and federal rules on a continuous basis. All state and federal rules contain compliance provisions; however, these provisions do not always fulfill the requirement for a continuous demonstration. When this occurs, IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, Compliance Determination Requirements are included in the permit. The Compliance Determination Requirements in Section D of the permit are those conditions that are found directly within state and federal rules and the violation of which serves as grounds for enforcement action.

If the Compliance Determination Requirements are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The changes to the compliance requirements are included in the "Proposed Changes" section below.

Proposed Changes

The changes listed below have been made to Part 70 Operating Permit No. 039-17563-00069. Deleted language appears as ~~strikethroughs~~ and new language appears in **bold**:

1. The facility descriptions in Section A.2 and D.1 have been modified, since the Permittee plans to use the curing oven to process non-phenolic binders. All references to "phenolic" when describing the curing oven have been deleted from permit conditions.

2. Condition D.1.3 - Particulate has been modified as requested by the Permittee and approved by IDEM's Air Compliance and Enforcement Manager. In the modified condition, the thermal oxidizer controlling particulates and opacity from the curing oven will be required to be in operation only when a phenol-formaldehyde based binder is being used, since inspection by IDEM confirmed that there are no particulate emissions and opacity issues (when bypassing the thermal oxidizer) with a non-phenolic binder.

3. After internal review and as approved by IDEM's Air Compliance and Enforcement Branch, the PM and VOC testing requirements under Condition D.1.4 have been deleted.

D.1.2 Preventive Maintance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B – Preventive Maintenance Plan, of this permit, is required for ~~phenolic~~ oven curing and its control devices.

D.1.3 Particulate

(a) In order to comply with condition D.1.1 and C.2, the dry prefilter chamber, **and** gravity settling chamber ~~and thermal oxidizer~~ shall be in operation at all times the ~~phenolic~~ curing oven is in operation.

(b) In order to comply with condition D.1.1 and C.2, the thermal oxidizer shall be in operation at all times the curing oven is in operation and a phenol - formaldehyde based binder is being used.

~~D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]~~

~~Within one-hundred and eighty (180) days after permit issuance, the Permittee shall conduct performance testing to~~

~~(a) Establish the fume thermal oxidizer system particulate capture and control efficiency, and determine compliance with the respective particulate and opacity limitations per conditions D.1.1 and C.2. The particulate testing shall be conducted for PM and PM-10 utilizing methods as approved by the Commissioner. PM-10 includes filterable and condensible PM-10.~~

~~(b) Determine the uncontrolled total volatile organic compound (VOC) emission rate from the phenolic curing oven.~~

~~Testing shall be conducted in accordance with Section C - Performance Testing.~~

~~D.1.5~~ **D.1.4** Thermal Oxidizer

When using a phenol-formaldehyde based binder:

(a) A continuous monitoring system shall be calibrated, maintained, and operated on the thermal oxidizer for measuring operating temperature. Continuous monitoring shall mean at least one (1) reading each minute. The output of this system shall be recorded as a three-hour average. ~~From the date of issuance of this permit until the approved stack test results are available, the~~ **The** Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three-hour average temperature of the thermal oxidizer is below 880°F. A three-hour average temperature that is below 880°F is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

~~(b) The Permittee shall determine the three-hour average temperature from the most recent valid stack test that demonstrates compliance with limits in conditions D.1.1 and C.2, as approved by IDEM.~~

~~(c)~~ **(b)** ~~On and after the date the approved stack test results are available, the~~ **The** Permittee shall take appropriate response steps in accordance with Section C - Response to Excursions or Exceedances whenever the three-hour average temperature of the thermal oxidizer is below **880 deg F** ~~the three-hour average temperature as observed during the compliant stack test.~~ A three-hour average temperature that is below **880 deg F** ~~the three-hour average temperature as observed during the compliant stack test~~ is not a deviation from this permit. Failure to take response steps in accordance with Section C - Response to Excursions or Exceedances shall be considered a deviation from this permit.

~~D.1.6~~ **D.1.5** Visible Emissions Notations

(a) Visible emission notations of the ~~phenolic~~ curing oven thermal oxidizer stack exhaust (stack ID A) and the ventilation roof stack exhausting the ~~phenolic~~ cure oven production

Conclusion and Recommendation

This proposed modification shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No. 039-28476-00069. The staff recommends to the Commissioner that this Part 70 Significant Permit Modification be approved.

7

IDEM

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

December 7, 2009

65-42 WQS/RJB
Leah Thwig
Anco Products Inc.
2500 SOUTH 17TH STREET
Elkhart, IN 46517

Re: No Exposure Exclusion
Anco Products Inc., Elkhart
Permit # INR210222

Dear Ms Thwig:

The Indiana Department of Environmental Management (IDEM) has received your facility's Conditional No Exposure Exclusion Certification pursuant to 327 IAC 15-6-12. By submitting this application your facility is certifying to IDEM there are no materials or operations exposed to storm water.

In order for a no exposure exclusion from NPDES Industrial Storm Water permitting to remain applicable a facility must maintain a condition of no exposure. Failure to maintain the condition of no exposure may lead to the unauthorized discharge of pollutants to waters of the state and IDEM is authorized to conduct inspections to confirm the condition of No Exposure.

Be aware that if any industrial activities or materials are or will be exposed to precipitation, the facility is not eligible for the conditional no exposure exclusion and must obtain coverage prior to exposure. Facilities must renew their exclusion by resubmitting a Conditional No Exposure Certification form prior to the five (5) year anniversary date, 11/02/2014.

If you have questions, please refer to our website, http://www.in.gov/idem/4901.htm, or contact Megan Nagle, Storm Water Specialist, at 317-234-5029 or by e-mail at mnagle@idem.in.gov.

Sincerely,

Randy J. Braun

Randy J. Braun, CPESC
Storm Water Program Manager
Office of Water Quality

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live

Evan Bayh
Governor

Michael O'Connor
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Telephone 317-232-8603
Environmental Helpline 1-800-451-6027

January 14, 1997

VIA CERTIFIED MAIL P 451 356 765

ANCO PRODUCTS, INC.
2500 SOUTH 17TH STREET
ELKHART, IN 46517

Dear Facility:

NPDES Permit No.: INR00A037
Facility Type: STORMWATER
Re: Annual NPDES Permit Fee Assessment

Please find enclosed the 1997 annual NDPES permit fee assessment for your facility. The fees for your facility are due on 03/15/1997. It is important to note that payment of fees must be received by the Department of Environmental Management by the due date, or a delinquency charge or other penalty under IC 13-18-20 will be imposed. Along with the assessment, the fee packet includes some or all of the following information depending on your facility type:

- Fee assessment invoice
- Installment payment coupons
- A pre-signed claim form
- How to Reduce Flow Rates at Wastewater Treatment Plants
- Important Information for Permittees
- Important Facts Concerning the Calculation of Annual Flow Fees
- Pertinent sections of IC 13-18-20, which includes fee schedules
- Questions & Answers About Permit Fees
- Custom Connect and FaxBack information

Please notice a change made to the invoice this year. According to I.C. 13-22-12-14, which was passed this year by the legislature, IDEM now offers the alternative of installment payments for those facilities that determine a single payment places undue hardship on them. Facilities should notify IDEM in writing that they feel such hardship with the payment due. Each facility may either pay the 1997 annual assessment fee in entirety by the due date, or pay the assessment in four equal, quarterly installments. Please check the appropriate box on the invoice if you desire to pay in installments, and note the amount due (which is the total fee divided by four). IDEM will **not** be sending separate assessments for each installment, so it will be your responsibility to check the due dates on the attached payment coupons and make appropriate payments. One payment coupon should be included with EACH installment payment. They provide documentation of your facility permit number and the address to which you should send your payment. IDEM will assess late penalties (equal to 10% of the installment total) on each installment that is not received by IDEM within 30 days after the due date.

Your permit fees will provide money for permitting and directly associated activities of the NPDES program. During the coming year, the Indiana Department of Environmental Management (IDEM) will continue to provide educational and technical assistance to Indiana businesses. Enclosed is information on two helpful IDEM services: Custom Connect and FaxBack. These services enable you to access IDEM information -- night or day. By working together, both the regulated community and IDEM can make Indiana a cleaner, healthier place to live.

If you have any questions regarding your fee assessment, please contact Laurie Maudlin at 317/233-0569. Due to the high volume of telephone inquiries received during the billing period, it may be necessary for you to leave a voicemail message. If you do so, please include your permit number with your message.

Sincerely,

R. J. Henley

R. J. Henley
Assistant Commissioner
Office of Water Management

Enclosures

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

Controller's Dept., Attention: Cashier, 100 N. Senate Ave., P.O. Box 7060, Room 1324, Indianapolis, IN 46207-7060

1997 ANNUAL NPDES PERMIT FEE ASSESSMENT

DATE: 01/14/1997

INVOICE NO.: 9700032
REVENUE CODE: 2830-433600-100600

PERMIT NO.: INR00A037
FACILITY TYPE: STORMWATER

FLOW (in MGD):
 # OF OUTFALLS:

MAILING ADDRESS:

ANCO PRODUCTS, INC.
2500 SOUTH 17TH STREET
ELKHART, IN 46517

BASE FEE:	$100.00
ADDITIONAL FEE*:	$.00
DISCOUNT:	-$.00
1997 CREDIT:	-$.00
AMOUNT DUE:	**$100.00**

NOTE: IF YOU HAVE ALREADY PAID YOUR 1997 NPDES PERMIT FEE, PLEASE DISREGARD THIS NOTICE.

*Additional fees are based upon flow, # of outfalls, or # of pipes.

DATE PAYMENT DUE: 03/15/1997

PLEASE KEEP TOP PORTION FOR YOUR RECORDS

IMPORTANT: PLEASE RETURN BOTTOM PORTION WITH YOUR PAYMENT

REMIT PAYMENT TO: IDEM
Controller's Dept.
Attention: Cashier
100 N. Senate Ave.
P.O. Box 7060, Room 1324
Indianapolis, IN 46207-7060

DATE: 01/14/1997

Pay in FEB 97

1997 ANNUAL NPDES PERMIT FEE ASSESSMENT

PERMIT NO.: INR00A037
FACILITY TYPE: STORMWATER

INVOICE NO.: 9700032
REVENUE CODE: 2830-433600-100600

MAILING ADDRESS:

ANCO PRODUCTS, INC.
2500 SOUTH 17TH STREET
ELKHART, IN 46517

AMOUNT DUE: **$100.00**

DATE PAYMENT DUE: 03/15/1997

☐ Check here if you would like to pay your 1997 annual fee assessment in equal, quarterly installments. Please consult the attached payment coupons for due dates. Your quarterly payment due will be **$25.**

ADDRESS CORRECTION: _____

INDUSTRIAL
SAFETY AND
ENVIRONMENTAL
SERVICES

P.O. BOX 233 • OSCEOLA, IN 46561 • PHONE: (219) 259-4138

May 13, 1994

Mr. Gary Luft
Anco Products, Inc.
2500 South 17th Street
Elkhart, Indiana 46517

Dear Gary:

Enclosed you will find an "update' letter sent to the Indiana Department of Environmental Management (IDEM) concerning Anco Products, Inc.'s Storm Water Pollution Prevention Plan. These letters let the IDEM know that Anco Products, Inc. is complying with the Storm Water Permit Rule.

The letter should be kept on file along with the Pollution Prevention Plan specifically written for Anco Products, Inc.

The scheduling for 1994's storm water sampling is for late spring, depending on the weather.

If you have any questions, please feel free to contact me at the Industrial Safety and Environmental Services office.

Very Truly Yours,

Dana Simpson

Dana Simpson
Industrial Safety and Environemntal Services

INDUSTRIAL
SAFETY AND
ENVIRONMENTAL
SERVICES

P.O. BOX 233 • OSCEOLA, IN 46561 • PHONE: (219) 259-4138

May 13, 1994

Ms. Laura Bieberich
Storm Water Coordinator
Office of Water Management
Indiana Department of Environmental Management
105 South Meridian Street
Indianapolis, Indiana

Dear Ms. Bieberich:

The purpose of this letter is to inform you of the work completed on the Stormwater Pollution Prevention Plan for Anco Products, Inc. (Anco), 2500 South 17th Street, Elkhart, Indiana, NPDES general permit number 00A037, as of May 13, 1994.

Please be advised of the following:

On June 28, 1993, storm water sampling was conducted at the Anco facility. The storm water samples consist of eight (8) parameters specified in the Stormwater Pollution Prevention Plan Workbook distributed by the Indiana Department of Environmental Management (IDEM).

On October 18, 1993, the Stormwater Pollution Prevention Plan was completed for Anco. A copy of the Stormwater Pollution Prevention Plan is retained on site at the facility.

The dates of implementation concerning the Best Management Practices (BMPs), planting new vegetation near erosion areas and inspecting those areas continuously, have been documented in the Stormwater Pollution Prevention Plan and will be implemented by the appropriate dates.

Completion of the training program for Anco is also at this time being developed for future use.

Storm water sampling is scheduled for late spring at the Anco facility.

I trust that the information provided will give you a better understanding of what has been accomplished thus far. If there are any questions as to the Stormwater Pollution Prevention Plan for Anco, please feel free to contact me at your convenience.

Very Truly Yours,

Dana Simpson

Dana Simpson
Industrial Safety and Environmental Services

cc: Mr. Gary Luft -- Anco Products, Inc.

INDUSTRIAL
SAFETY AND
ENVIRONMENTAL
SERVICES

P.O. BOX 233 • OSCEOLA, IN 46561 • PHONE: (219) 259-4138

January 4, 1995

Gary Luft
Anco Products, Inc.
2500 South 17th Street
Elkhart, Indiana 46517

Dear Mr. Luft:

The purpose of this letter is to inform you of the status of the Anco stormwater Pollution Prevention Plan (PPP). There are a few more requirements to fulfill before the issue can be considered closed.

Stormwater sampling was performed at your facility on July 7, 1994. Analysis results from that sampling are enclosed with this letter. One further sample needs to be taken in order to comply with 327 IAC 15: NPDES General Permit Rule Program.

Four visual inspections of stormwater are also required. Two of these inspections must take place in 1995 and the other two in 1997. These inspections require visual characterization of stormwater turbidity, color, foam, solids, floatables, and oil sheen.

Please remember that the PPP for Anco must be updated every time there is modification to the path, quality or character of the stormwater on the property. This is a requirement of the state code which must be followed in order to maintain compliance.

I have enclosed the annual progress letter that was sent to Laura Bieberich, Stormwater Coordinator, IDEM. An annual update letter must be sent to the state every year that stormwater sampling or visual inspections take place.

I will be contacting you during the spring to inform you of stormwater sampling and visual inspections that should occur. If you have any questions regarding the letter to Ms. Bieberich, or the sampling and visual inspection requirements, please feel free to contact me at your convenience.

Very Truly Yours,

Nathan Bair
Consulting Engineer
Industrial Safety and Environmental Services

Enclosures: 2as

INDUSTRIAL
SAFETY AND
ENVIRONMENTAL
SERVICES

P.O. BOX 233 • OSCEOLA, IN 46561 • PHONE: (219) 259-4138

January 4, 1995

Laura Bieberich
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46206

Dear Ms. Bieberich:

The purpose of this letter is to report to you the stormwater sampling performed at Anco Products, Inc. Elkhart, Indiana. Industrial Safety and Environmental Services (ISES) was retained to assist Anco Products with the creation of their Pollution Prevention Plan (PPP) and stormwater sampling.

Initial Sampling took place on July 7, 1993. A stormwater sample was taken on July 6, 1994. The results of the analysis performed on those samples are enclosed with this letter. Another sample will be taken in the spring of 1995 to complete the physical stormwater sampling requirements. Visual inspection of stormwater will occur for two precipitation events in 1995 and 1997. Annual reports will be made to your office for every year that sampling or visual inspections take place.

The updating of the Anco PPP, stormwater sampling, and visual inspections are intended to maintain Anco Products' compliance with 327 IAC 15: NPDES General Permit Rule Program. If you have any questions regarding the results of the stormwater sampling, please feel free to contact me at your convenience.

Very Truly Yours,

Nathan Bair
Consulting Engineer
Industrial Safety and Environmental Services

cc: Mr. Gary Luft Anco Products, Inc.

Environmental Health Laboratories

110 S. Hill Street
South Bend, IN 46617
(219) 233-4777
(219) 233-3272
FAX (219) 233-8207

LABORATORY REPORT

Client: Industrial Safety & Environmental Services
Attn: Nathan Bair
716 Lincolnway West
Osceola, IN 46561

Report#: 120744–58(44-51)

Priority: Standard Written

Status: Final

Project/Site: ANCO / Stormwater (Front Prop.)

Samples Submitted: Eight Stormwater Samples

Copies to: None

Collected: 07–06–94 By: Client Received: 07–07–94

REPORT RESULTS

Eight samples were submitted for BOD, COD, Nitrogen (Kjeldahl), Oil & Grease, Total Phosphorus, Total Suspended Solids (TSS), Nitrate–Nitrite, and Nitrite analysis. Quantitative results are presented below. Results of all associated quality control samples were within acceptance limits. No project specific quality control was requested.

GENERAL CHEMISTRY–Stormwater

Parameter	Method	PQL			Results	
BOD	EPA-405.1	10	√	<	10	mg/L
COD	EPA-410.1	2.0			58	mg/L
Nitrogen (Kjeldahl)	EPA-351.4	0.5			2.6	mg/L
Oil & Grease, Total	EPA-413.1	1.0			6.0	mg/L
Phosphorus, Total	EPA-365.2	0.1			0.3	mg/L
Suspended Solids, Total	EPA-160.2	4.0		<	4.0	mg/L
Nitrogen, Nitrate-Nitrite	EPA-353.2	0.02			1.3	mg/L
Nitrogen, Nitrite	EPA-353.2	0.01			0.06	mg/L

If dilutions were required for quantitation of specific parameters, they are indicated by a (√) preceeding the result.

Analyzed: 07–08 to 07–18–94 Analyst: PC/ JV/ WJ & Ref. Lab(Edglo)

Contiuned on the following page

Client: Industrial Safety & Environmental Services Report#: 120744-58(44-51)

We appreciate the opportunity to provide you with this analysis. If you have any questions concerning this report, please do not hesitate to call us at (219) 233-4777.

REVIEWED BY: Paul J Carnie DATE: 8-4-94

FINALIZED BY: John E. George III DATE: 8/5/94

Client: Industrial Safety & Environmental Services Report#: 120744-58(44-51)

REFERENCES AND DEFINITIONS OF TERMS

General Chemistry

References:

1. EPA-600/4-79-020
Methods for Chemical Analysis of Water and Wastes
2. Standard Methods For the Examination of Water and Wastewater
Vol. 17, 1989
3. Standard Method of Test for Nitrate Using an Ion Selective Electrode
Orion WeWWG/5880
4. EPA Test Methods for Evaluating Solid Waste
SW-846, Third Edition, November 1986

Practical Quantitation Limits (PQL's) represent the lower limit at which the compounds of interest can be accurately measured, at a 95% confidence level, and reported for a sample exhibiting minimal chemical background interference under the conditions employed in the analytical procedure. PQL's are by definition a function of the instrument performance for an ideal sample and thus are not adjusted for sample dilutions used to calculate results.

Results: Values presented in the result column represent the lowest reportable value for a parameter after correcting for all sample dilutions.

1 mg/L = 1 milligram per liter = 1 part per million (ppm).

< = "less than." This number is the lowest reportable value by the procedure used for analysis after factoring in all dilutions.

Industrial Safety and Environmental
P.O. Box 233
1415 Lincolnway West-Suite E
Osceola, IN 46561
ATTN: Nathan Bair

HEADQUARTERS/LABORATORY
705 FRONT STREET
TOLEDO, OHIO 43605
PHONE: (419) 693-5307
FAX: (419) 691-0418

ENVIRONMENTAL LABORATORY
1632 ENTERPRISE PARKWAY
TWINSBURG, OHIO 44087
PHONE: (216) 425-8200
FAX: (216) 425-1349

lab no. 97T03157
p.o. no.

rev: 0

SAMPLE
DESCRIPTION: Project Name - ANCO - Grab 1-5 - Sample Date 03/25/97 @ 10:05

RESULTS:

ANALYTE	METHOD	RESULT
pH in S. U.	EPA-600, 150.1	4.58
Total Oil & Grease	EPA-600, 413.2	0.66 mg/L
Total Suspended Solids	EPA-600, 160.2	44 mg/L
Kjeldahl Nitrogen as N	EPA-600, 351.3	Less than 0.15 mg/L
Nitrate - Nitrite as N	EPA-600, 353.3	0.61 mg/L
Total Phosphorus as P	EPA-600, 365.2	Less than 0.10 mg/L
BOD_5	EPA-600, 405.1	14 mg/L
COD	EPA-600, 410.1	170 mg/L

date completed: 04/07/97
tech: LMJ/PG/CSY/GJB
approved by:

Industrial Safety and Environmental
P.O. Box 233
1415 Lincolnway West-Suite E
Osceola, IN 46561
ATTN: Nathan Bair

HEADQUARTERS/LABORATORY
705 FRONT STREET
TOLEDO, OHIO 43605
PHONE: (419) 693-5307
FAX: (419) 691-0418

ENVIRONMENTAL LABORATORY
1632 ENTERPRISE PARKWAY
TWINSBURG, OHIO 44087
PHONE: (216) 425-8200
FAX: (216) 425-1349

lab no. 97T03158
p.o. no.

rev: 0

SAMPLE
DESCRIPTION: Project Name - ANCO - Composite 1-4 - Sample Date 03/25/97 @ 10:05

RESULTS:

ANALYTE	METHOD	RESULT
pH in S. U.	EPA-600, 150.1	6.69
Total Suspended Solids	EPA-600, 160.2	160 mg/L
Kjeldahl Nitrogen as N	EPA-600, 351.3	Less than 0.15 mg/L
Nitrate - Nitrite as N	EPA-600, 353.3	1.6 mg/L
Total Phosphorus as P	EPA-600, 365.2	Less than 0.10 mg/L
BOD_5	EPA-600, 405.1	10 mg/L
COD	EPA-600, 410.1	150 mg/L

date completed:	tech.	approved by:
04/07/97	LMV/FG/CSY/GJB	

TANK ASSESSMENT
ANCO PRODUCTS
2500 S. 17TH STREET
ELKHART, INDIANA

John C. Wallace, Inc.

Environmental Consultant
1215 Whitehall Drive
South Bend, Indiana 46615

Telephone 219-233-7141

February 20, 1991

Mr. Mark Billington
Indiana Department of Environmental Management
Underground Storage Tank Division
2321 Executive Drive
Indianapolis, Indiana 46241

RE: UST Closure
Anco Products Corporation
2500 17th Street
Elkhart, Indiana

Dear Mr. Billington:

This letter/report is intended to clarify the work completed, as well as the work still in progress, at the above mentioned site. There has been continual correspondence with your office during work proceedings, beginning with Registration and Intent To Close documents dated; September 12, 1989.

BACKGROUND:

The position of the USTs for the site is under a portion of the facility. These tanks were discovered during a site assessment conducted for business purposes unrelated to the purpose of this writing. Four monitor wells were installed as part of the investigation for the business related site assessment (figure 01).

The tanks are constructed of stainless steel and are entombed in a cement (secondary) containment. At this time it is not known as to whether or not the cement containment extends beyond the building.

GROUNDWATER:

Inferred Groundwater flow was established by using Department of National Resources Document; St. Joseph River Basin Water Resource Assessment 87-1, and work performed by ENSR of Boston Massachusetts.

The monitor wells were installed by Cook Well Drilling Company of Niles, Michigan, June 7, 1989. A gasoline powered rotary drill was used. The apparatus for installation of wells and soil identifications consisted of a hollow stem flight auger and a split spoon sampling devise.

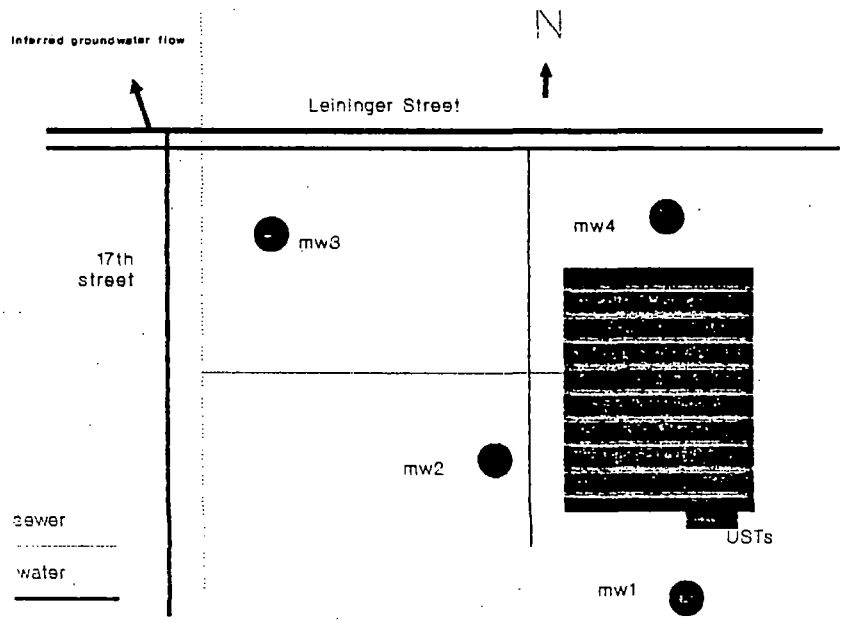
Monitor well construction consists of 2" pvc tubing (non glue assembly). The wells have been seated at approximate depth of 22'-23'. A ten foot section of screen was installed at 12', or at a level that would allow for the screen to straddle the

approximate depth that groundwater was first detected. Soil conditions have been described in the well logs (Exhibit C).

UNDERGROUND STORAGE TANKS:

Products found in the tanks contained regulated substances; acetone and toluene. June 14, 1989 water samples were drawn from each monitor well. Before samples were taken, three columns of water were removed from each well. Sample results did not indicate the presence of acetone or toluene in the groundwater (Exhibit B).

Figure 01
USTs located at the south end of the facility and directly north of Monitor Well 1 (mw1).



October 13, 1989 the tanks were cleaned and neutralized by K&D Industrial Services, Kalamazoo, Michigan. Waste materials were transported by K&D to Petro Chem of Detroit, Michigan for disposal. An inspection of the interior of the tanks did not reveal any leaks, pinholes or cracks. The tanks are presumed to be in sound condition.

AGENCY CORRESPONDENCE:

It was decided that the tanks would be closed in place so as not to undermine the facility structure. This procedure and the position of the tanks would not allow for samples to be

taken in the three (3) areas described by the IDEM (two from the floor at both ends, and one from the sidewall). Ms. Karla McDonald of the IDEM was contacted and informed of this decision.

Ms. Karla McDonald and Ms. Anne Black from the IDEM informed CHES Consultants and Anco Products that the appropriate means of closure for the tanks would be temporary, until a document describing procedures for tank related site assessments was released by the IDEM. A request for this document was given in writing December 18, 1989. As of February 11, 1991, said document has not been received.

CURRENT WORK:

December 11, 1990 the monitor wells were accessed to determine groundwater level. A significant rise in water was detected. Groundwater was first encountered at a depth of @ 12', a difference of about two (2) feet from the levels detected during well installation (June 7, 1989).

January 24, 1991 samples were drawn from monitor wells; mw1, mw2 and mw3 (due to the amount of snow covering, mw4 was not sampled). Before samples were taken, three columns of water were removed from each well. Sample results do not indicate the presence of compounds; toluene and acetone (Exhibit A).

PROPOSED WORK:

March 5, 1991 is the scheduled date for excavation to begin. Mr. Steve Gatman from the Concord Township Fire Chiefs office has been informed of the intended proceedings

It is possible, that the USTs can be totally removed and sampling can be achieved in the appropriate manner (2 samples from the floor at both ends, and one sample from the sidewall). In the event that it is decided during the excavation that total removal of the USTs would seriously undermine the structure, all or a portion of the USTs will have to remain. Sampling would than be achieved by cutting holes through the floor of the USTs. Closure of the tanks would then be achieved by closure in place and sand fill material would be used.

Sample analysis will be conducted by Dihydro Analytical Services, 4455 Fletcher, Wayne, Michigan. Parameter for analysis will be performed in the described manner (TPH; GCFID).

CLOSING:

Closure documents will be prepared and then submitted to your office.

Thank you for your time and consideration in this matter. If there are any questions regarding the information contained herein, please do not hesitate to contact my office at your earliest convenience.

Very truly yours,
John C. Wallace, Inc.

John C. Wallace

Exhibits:

A. Monitor Well Sampling Results; January 24, 1991

B. Monitor Well Sampling Results; June 14, 1989

C. Well Logs

D. Groundwater Information

EXHIBIT A

SAMPLE RESULTS 1-24-91

DIHYDRO ANALYTICAL REPORT

CLIENT: John C. Wallace, Inc.

REPORT#: L-91-01-148

SAMPLING SITE: Anco Tank Assessment

SAMPLING DATE: 1-24-91

MATRIX: Water

SAMPLE DESCRIPTION	ACETONE	TOLUENE
Anco-1A, MW-1	<10	<0.2
Anco-2A, MW-2	<10	<0.2
Anco-3A, MW-3	<10	<0.2

All results are expressed as µg/l (ppb) .

Fred Hoitash

Fred Hoitash
Director of Environmental Services

EXHIBIT B

SAMPLE RESULTS 6-14-89

DIHYDRO ANALYTICAL REPORT

CLIENT: C.H.E.S. Consultants, Inc.

REPORT#: L-89-06-86

SAMPLING DATE: 6-14-89

SAMPLING SITE(S): Anco Products

PARAMETERS	RESULTS			
Matrix:	*Water*			
Sample(s) Description:	*AW-1*	*AW-2*	*AW-3*	*AW-4*
Acetone	<0.2	<0.2	<0.2	<0.2
Toluene	<0.0004	<0.0004	<0.0004	<0.0004
Phenols	<0.1	<0.1	<0.1	<0.1

All results are expressed as mg/l (ppm) except as noted.

Fred Hoitash

Fred Hoitash
Director of Environmental Services

EXHIBIT C

WELL LOGS

EXHIBIT B

wellpoint installation

Project Anco WELLS Job No.

Location ANCO Products Date 6/7/89 Boring No.

Vented Cap (yes) (no)

Protective Casing

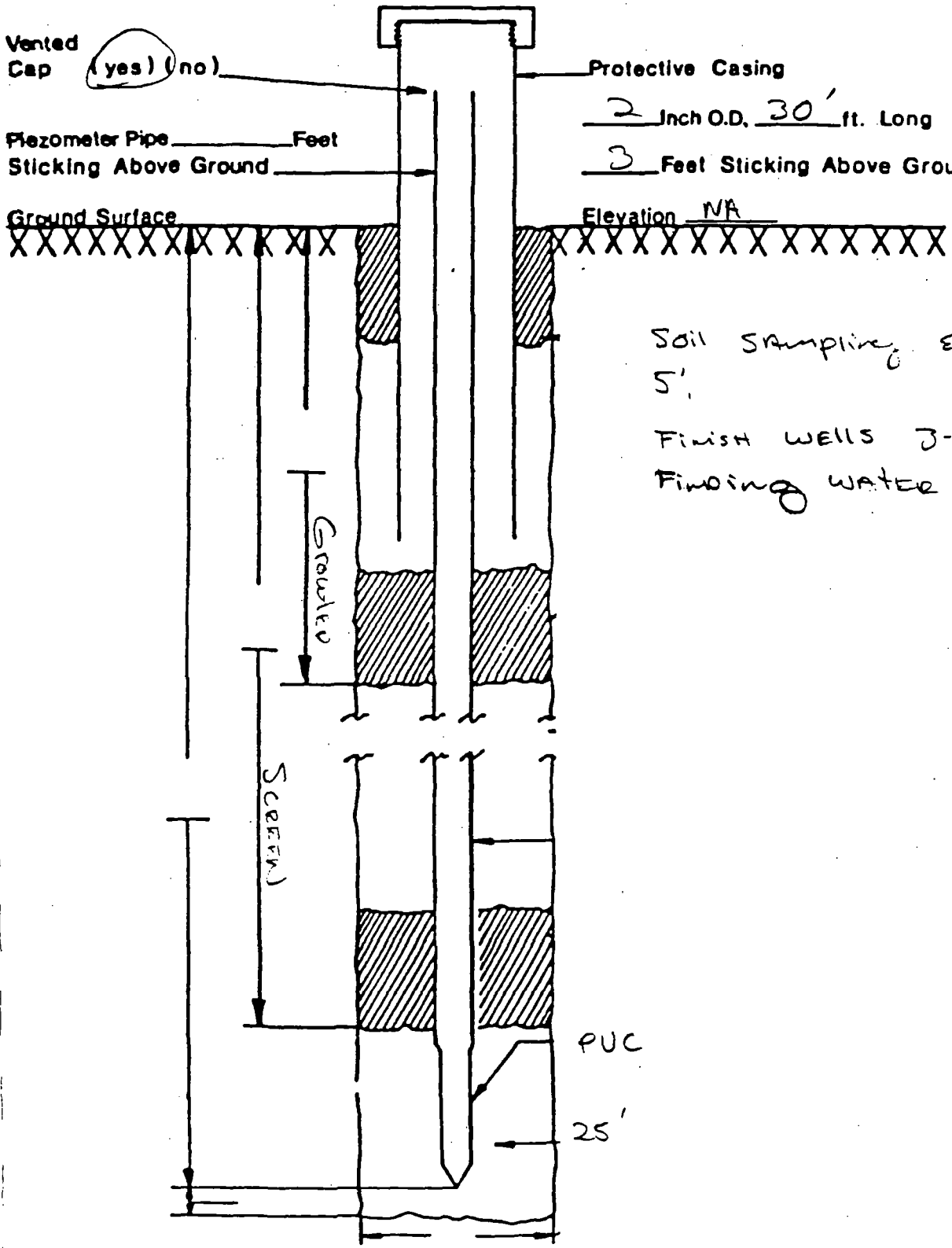
2 Inch O.D. 30' ft. Long

Piezometer Pipe Feet Sticking Above Ground

3 Feet Sticking Above Ground

Ground Surface

Elevation NA



Soil sampling every 5'.

Finish wells 3-5' after finding water in auger

EXHIBIT C

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

2410 Weaver Rd.
Niles, MI 49120
616-684-6269

BORING NO. Well #1 SHEET 1 OF 5

PROJECT ANCO LOCATION ELKHART Ind

JOB NO. Anco DATE COMPLETED June 7 89 WEATHER Sunny HOT

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 24.3 AFTER 24 HRS. _____

FIELD BORING LOG

DEPTH (From - To)	METHOD	SAMPLE NO.	RECOVERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	N	DESCRIPTION, REMARKS, ETC.
0.0-0.1	SS	1	18"	0.0-1.5	7	7	8		Sandy Top Soil
0.1-1.0	"	2	"	4.5-6.0	2	2	2		Med Dark Brn fine-med Sand
1.0-4.8	"	3	"	9.0-10.5	4	6	10		Med Brn fine-med Sand
4.8-7.2	"	4	"	13.5-15.0	3	4	5		Loose Brn fine-med Sand Trace silt
7.2-14.0									Med-Brn med-course Sand - gravel
14.0-15.0									wet Loose Brn-fine-med-Sand fine gravel
				Augered To 23.0					
				Set Well	18.0 To 23.0, Screen				
									EOB 23.0

LOG NO. CMC 75 LOGGED BY Brian Matendale

EXHIBIT C

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

2410 Weaver Rd.
Niles, MI 49120
616-684-6269

BORING NO. Well #2 SHEET 2 OF 4

PROJECT ANLO LOCATION ELKHART Ind

JOB NO. ANLO DATE COMPLETED June 7 89 WEATHER Sunny HOT

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 14.5 15.3 In well AFTER 24 HRS. _____

FIELD BORING LOG

DEPTH (From - To)	METHOD	SAMPLE NO.	RECOVERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	N	DESCRIPTION, REMARKS, ETC.
0.0 - 0.4	SS	1	18	0.0 - 1.5	1	3	4		Sandy Top Soil
0.4 - 7.6	"	2	"	4.5 - 6.0	2	3	3		Loose Brn fine-med Sand Tr Gravel
7.6 - 12.0	"	3	"	9.0 - 10.5	3	4	5		Loose Brn. med - coarse Sand fine gravel
12.0 - 14.4	"	4	"	13.5 - 15.0	3	5	8		med Brn med - coarse Sand. gravel
14.4 - 15.0									wet, " " " " "
				Augered to @ 23.0					
				Set Screen from 14.0 - 23.0					

IG NO. CME 75 LOGGED BY Dan Martindale

EXHIBIT C

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

2410 Weaver Rd.
Niles, MI 49120
616-684-6269

BORING NO. Well #3 SHEET 3 OF 4

PROJECT ANCO LOCATION Elkhart Ind

JOB NO. ANCO DATE COMPLETED June 7 89 WEATHER Sunny Hot

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 14.0 AFTER 24 HRS. _____

FIELD BORING LOG

DEPTH (From - To)	METHOD	SAMPLE NO.	RECOVERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	N	DESCRIPTION, REMARKS, ETC.
0.0 - 0.7	SS	1	18"	0.0-1.5	2	2	2		Sandy Top Soil
0.7 - 3.4	"	2	"	4.5-6.0	2	2	3		Loose Dark Brn fine-med Sand
3.4 - 7.8	"	3	"	9.0-10.5	3	4	5		Loose Brn fine-med Sand
7.8 - 14.0	"	4	"	13.5-15.0	4	4	5		Loose Lht Brn fine sand
14.0 - 16.0									Loose Brn med-course sand-gravel
				Agreed	To	23.0			EOB 23.0'
				Set well	Screen			14.0	-23.0

ING NO. CMC 25 LOGGED BY [illegible]

EXHIBIT C

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

2410 Weaver Rd.
Niles, MI 49120
616-684-6269

BORING NO. Well #4 SHEET 4 OF 4

PROJECT ANCO LOCATION ELKHART Ind

JOB NO. ANCO DATE COMPLETED June 7 89 WEATHER Sunny Hot!

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 13.8. AFTER 24 HRS. _____

FIELD BORING LOG

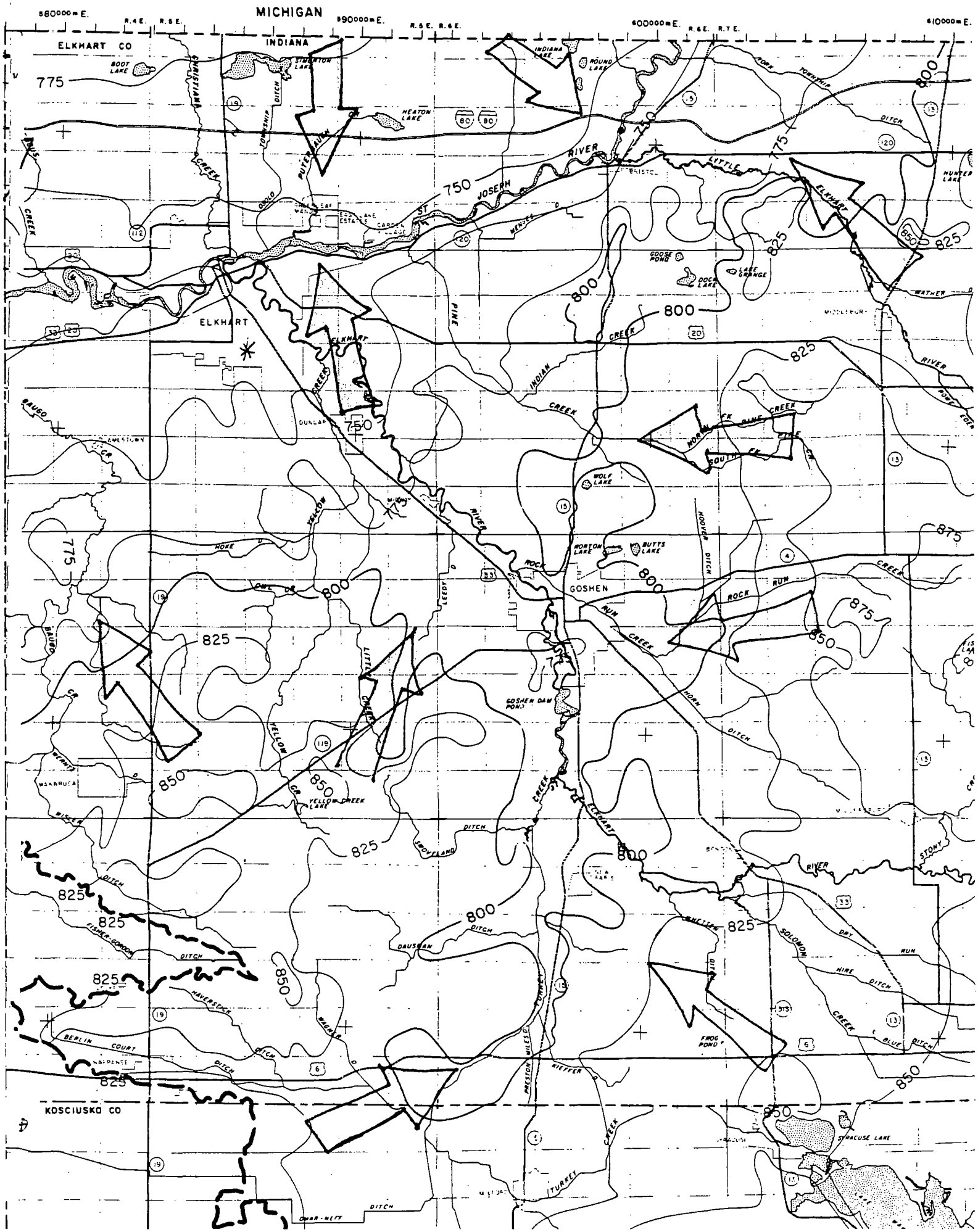
DEPTH (From - To)	METHOD	SAMPLE NO.	RECOV-ERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	N	DESCRIPTION, REMARKS, ETC.
0.0 - 0.2	SS	1	1.0'	0.0-1.5	Auger	5	6		Asphalt
0.2 - 3.2	"	2	"	4.5-6.0	4	4	5		Med Brn fine - med - Sand to gravel to silt
3.2 - 4.7	"	3	"	9.0-10.5	4	6	4		Dark Brn med - coarse Sand - to silt - gravel
4.7 - 10.4	"	4	"	13.5-15.0	3	7	5		Loose Brn med - coarse Sand - gravel
10.4 - 13.8									Med Brn fine Sand
13.8 - 15.0									wet med Brn - med - coarse Sand gravel
				Augered down to 23.0' EOB 23.0'					
				Set Well Screen					18.0' To 23.0'

JOB NO. Cre 75 LOGGED BY Alan Martindale

EXHIBIT D

GROUNDWATER INFORMATION

ENHIBIT A JAMES M.



APPENDIX B - GROUND-WATER FLOW AND TRANSPORT MODEL

1.0 Model Application

The most extensive application of this model was for the screening and preliminary design of the remedial alternatives. Modeling enables a more precise design of remedial alternatives to aid in predicting the cost estimates. For example, it will be possible to simulate numerous alternatives for treatment by pumping, enabling evaluation of combinations of pumping parameters that will most effectively reduce or remove contamination. Plume behavior under no action and source-control remedial alternatives was also simulated.

The results of this portion of the modeling will be discussed in the Remedial Action Evaluation, which is to be submitted to the EPA on November 15, 1988.

1.1 Analysis of Contaminant Transport

The model has been used to test and add detail to the preliminary, qualitative assessment of contaminant transport in the Site Area - to change apparent contaminant sources and flow systems into definitive ones. Modeling made possible the simulation of ground-water flow and transport to a relatively detailed field of measured hydraulic conductivity and gradient values. Most significantly, the modeling of contaminant transport has shown which contaminant plumes appear to be attributable to the Site, and which do not.

1.2 Model Selection

Selection of a mathematical model for a particular study primarily involves consideration of study objectives and the complexity of the study area. The model study objectives consist of analysis of contaminant transport, determination of

potential exposure concentrations for the hazard evaluation and the evaluation of various alternatives for ground-water remediation. These objectives dictate the need for a contaminant-tranport model that can simulate ground-water flow and contaminant concentrations, both with and without the effects of pumping. In order to explore various pumping and/or reinjection scenarios, the model should also have the capability to simulate the effects of ground-water pumping into and out of the aquifer (positive and negative fluxes) at various locations.

Due to the complexity of the Site Area, a fully three dimensional model is needed which can account for the presence of an intermittent clay layer as well as variations in hydraulic conductivity, layer elevations and thicknesses and other hydraulic properties. The model selected was a three-dimensional numerical contaminant-transport model developed at Princeton University (Babu et al. 1987).

1.3 Model Description

The model has two parts, the ground-water flow portion and the contaminant-transport portion which are performed in phases. The first phase only evaluates the ground-water flow and outputs the steady-state water elevations. These steady-state elevations are then used by the model to calculate the ground-water velocity field for the contaminant-transport phase. The model uses a finite-element formulation to solve the basic equations of flow and conservation of mass in the horizontal plane. A finite difference formulation is used in the vertical direction. The contaminant fate and transport mechanisms considered by the model include advection, dispersion and adsorption. In addition, the model allows the following:

- source conditions consisting of either a specified contaminant-flux rate or specified concentration;
- boundary conditions consisting of a specified water elevation or a specified flux rate; three-dimensional, element-by-element variations in aquifer thickness, layer thickness, hydraulic conductivity and dispersivity; and
- specification of pumping or injection at any nodal point.

1.4 Model Setup and Calibration

In order to apply the numerical ground-water model to the Site Area, a finite-element grid was developed and the model boundary conditions and parameters were specified. Grid development consists of partitioning the study area into subregions called elements. Points at which elements intersect are called nodes. Calculations of flow and contaminant conservation are performed at the nodal locations; therefore, the grid spacing determines the precision of model simulations. The model grid developed for the Site Area is shown in Figure B-1. This grid was developed so that the nodal spacing would provide adequate resolution of the contaminant plumes.

Boundary conditions were specified based on hydrogeological data collected by ENSR (1988). These data indicated that the general direction of ground-water flow in the region is north-northwest. The finite element grid was oriented so that the x-axis is approximately parallel to the direction of ground-water flow. No-flux boundary conditions were then specified along the eastern and western model boundaries that are parallel to flow. Ground-water elevation boundary conditions were specified along the northern and southern boundaries in accordance with water-level data collected in October 1987, February 1988, May 1988 and July

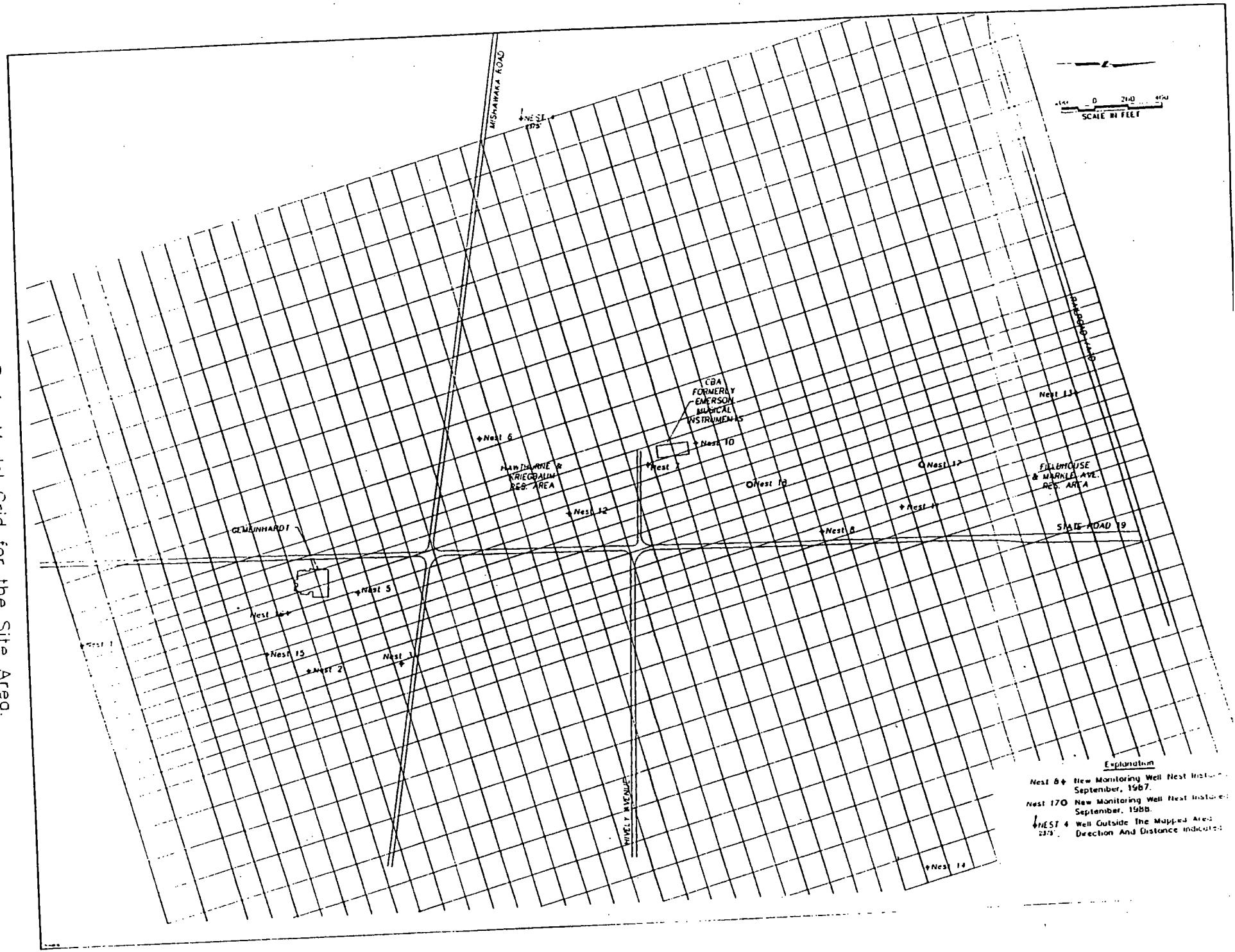


Figure B-1 Model Grid for the Site Area.

1988 (ENSR, 1988). The May, 1988 data were used as a representative sample to calibrate the flow portion of the model. The ground-water elevation boundaries that were specified were interpolated from the May 1988 data to the north and south nodes using a geostatistical interpolation technique known as kriging (Journal and Huijbregts, 1978). The FORTRAN code AKRIP (Kafritsas and Bras, 1984) was used to perform the kriging.

Values for aquifer and layer thickness were derived from information presented in the preliminary hyrdogeological report (ENSR, 1988). These values were kriged to the nodes in the grid using AKRIP. Initial estimates of hydraulic conductivity were based on slug tests performed at the 14 well nests installed by ENSR (1988). Some of these estimates were confirmed with laboratory grain-size analyses and falling-head permeability tests. Calibration of the flow portion of the model involved refinement of the hydraulic conductivity values until predicted ground-water elevations were in good agreement with actual ground-water elevation from field data (Figure B-2). The closeness of this agreement is a measure of the accuracy with which the model is able to describe ground-water flow conditions and the movement of contaminants in the ground water. To obtain this fit between the predicted and observed ground-water elevations, some of the hydraulic conductivity values used in the model were changed no more than an order of magnitude from measured hydraulic conductivity values. A plot of the final kriged natural log hydraulic conductivities used for the model is presented in Figure B-3.

The contaminant transport portion of the model was calibrated by adjusting the duration and magnitude of the contaminant source and the magnitude of the dispersivity values. These values were adjusted until the model closely simulated contaminant concentration values measured by ENSR (1988). The selection of these parameters is discussed below. The tetrachloroethene data were used to calibrate the

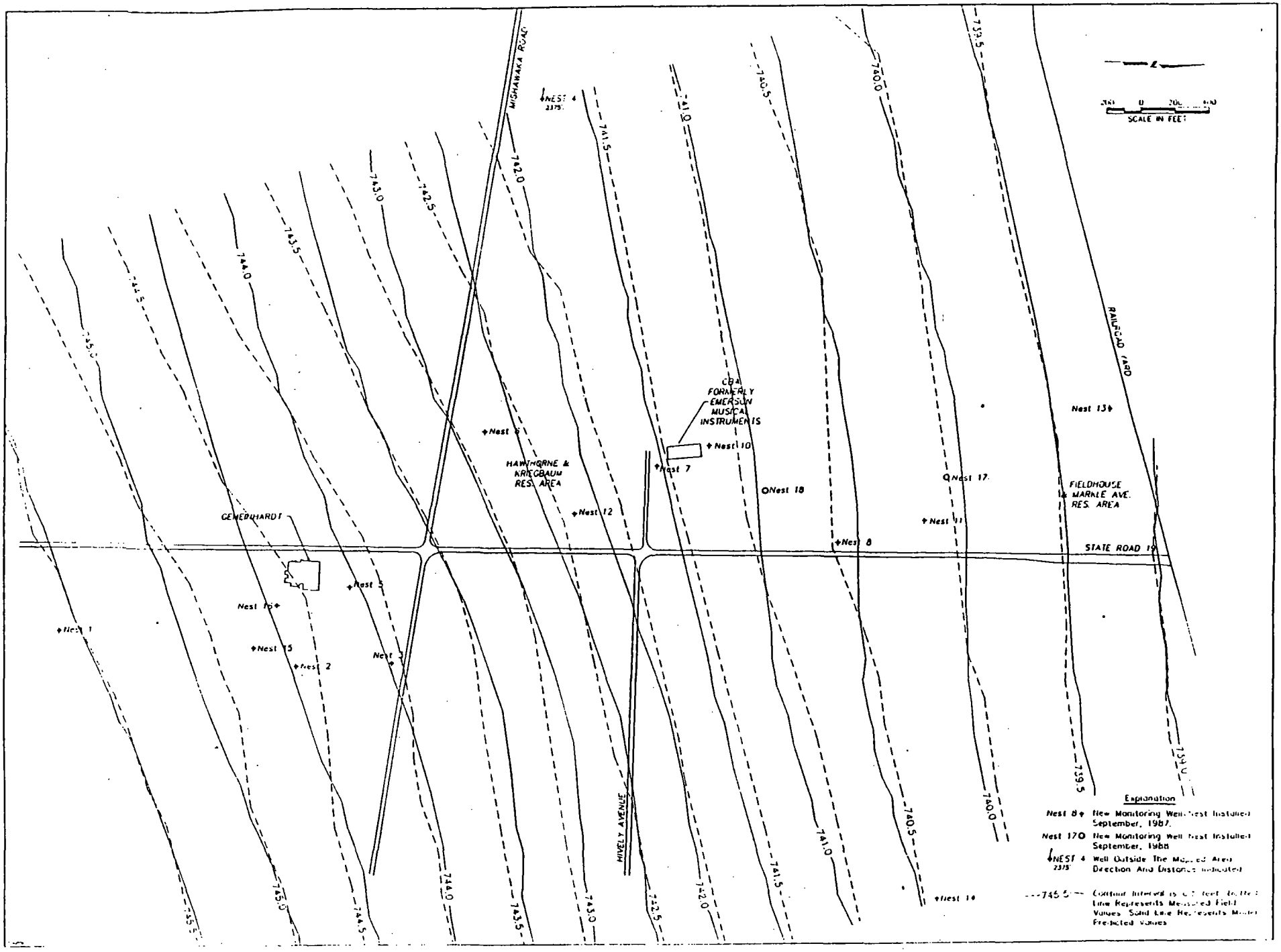


Figure B-2 Site Area Water-Table Map Of Measured Field Values Taken May 1988 and Predicted Model Values.

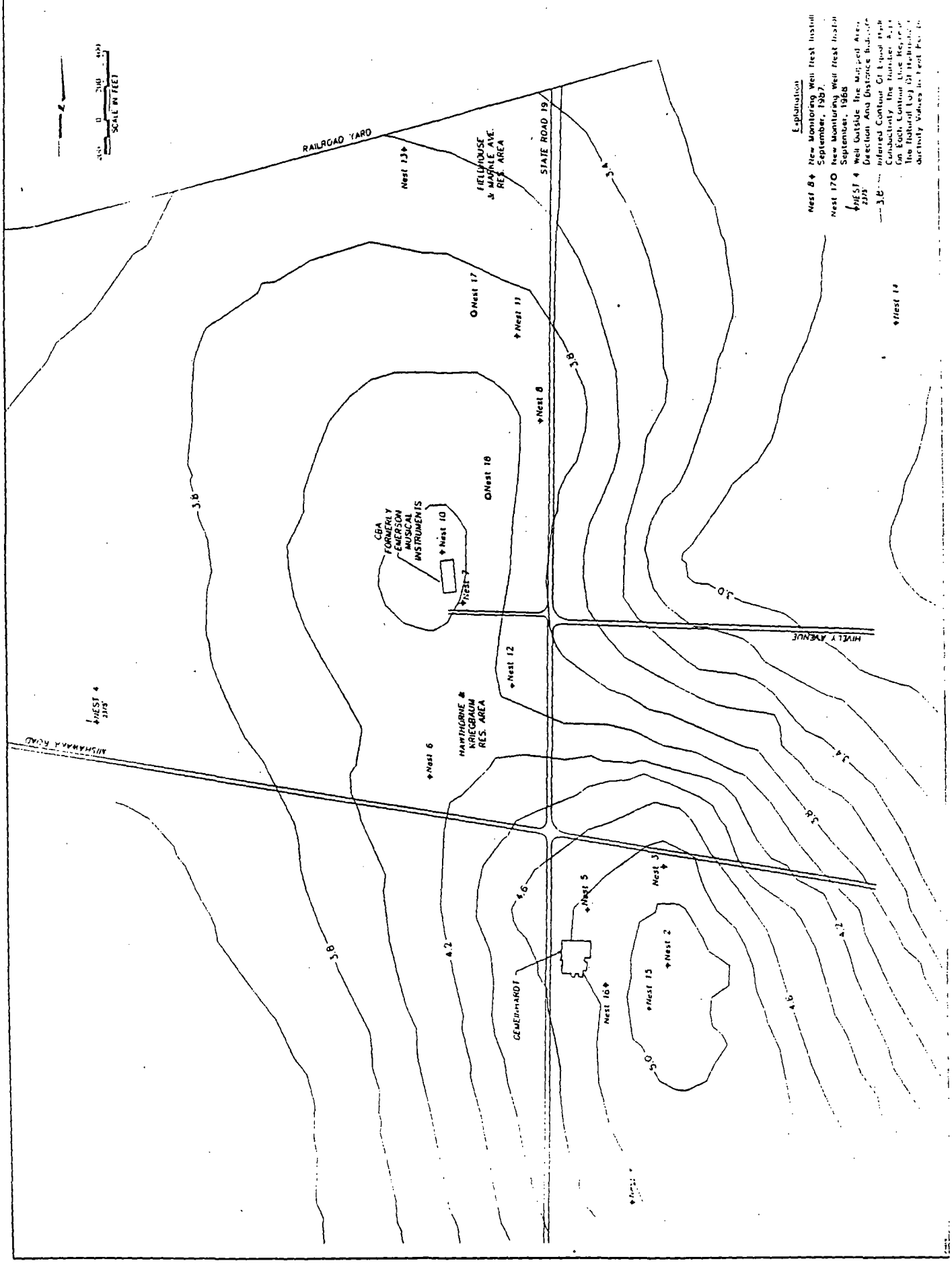


Figure B-3 Site Area Log Hydraulic Conductivity Values used in the Model.

contaminant-transport parameters; these data were chosen to calibrate to for a variety of reasons. First, tetrachloroethene was used for a relatively short and well-defined period of time, facilitating the specification of the source strength. Secondly, there is no documentation of another source of tetrachloroethene in the immediate vicinity, so it is more likely that the plume, as sampled in 1988, is only a result of a source near well nest 5.

The longitudinal and transverse dispersivity values were adjusted until the width and length of the modeled plume match the sampled values. Due to the sparse nature of reliable contaminant data, it is difficult to determine exactly how much dispersion has taken place. Numerical dispersion in the model makes an exact selection of dispersivity values impossible. The dispersivity values used in the calibration were 50 ft and 10 ft for the longitudinal and transverse dispersivities, respectively. Although the transverse dispersivity predicts a slightly wider plume than is observed, attempting to use a smaller value results in numerical instabilities in the model. The difference between the width of the observed and predicted plumes is not significant for the purposes of the model.

To calibrate the contaminant plume, the possibility of adsorption of the contaminant to the aquifer deposits was considered. If the contaminant of interest is adsorbed, the general effect will be to slow the movement of the plume. The degree to which a contaminant is adsorbed is proportional to the fraction of organic carbon content of the aquifer. The fraction of organic carbon values measured in samples collected in the Site Area ranged from 0.03% to 0.17%, with most of the non-clayey soils having values at the low end. These values are very low and suggest that very little contaminant adsorbtion is occurring. Using the ground-water velocities calculated during the first phase of the model calibration and assuming no retardation, the position of the plume predicted by the model closely matches the observed plume location.

John C. Wallace, Inc.

Environmental Consultant
1215 Whitehall Drive
South Bend, Indiana 46615
Telephone 219-233-7141

February 26, 1991

Mr. Mark Billington
IDEM
Office of Environmental Response
UST Section
5500 West Bradbury Ave.
Indianapolis, IN 46241

RE: Tank Closure
Anco Products
2500 17th St.
Elkhart, IN 46517

Dear Mark:

Enclosed please find Closure Notification Form. A document dated February 20, 1991 was submitted to your attention, in which a description of the efforts surrounding the assessment of the USTs and the site in general was delineated.

Thank you for your time and consideration in this matter. If there are any questions regarding the information submittred to you, please do not hesitate to contact my office at your earliest convenience.

Very truly yours,

John C. Wallace, Inc.

j.c.w.

Note: Starks Excavating has applied for a Certification Number. Upon receipt of said number, an addendum will follow to be attached to the enclosed Closure Notification.

Underground Storage Tank Closure Notification Form

Mail 30 days prior to intended tank closure date to:
Indiana Dept. of Environmental Management
Office of Environmental Response
UST Section/Closure Notice
5500 West Bradbury Avenue
Indianapolis, IN 46241

Tank Owner Information

Owner Name: Mr. Howard Tomlinson
Street Address: 2500 S.17th St.
City, State, Zip: Elkhart IN. 46517
Telephone: 219 293 5574
Contact Person: Al Guantiano

Tank Location Information

Location Name: Anco Products
Street Address: 2500 S. 17th St
City, State, Zip: Elkhart. IN 46517
Telephone/County: 219 293 5574 /Elkhart
Contact Person: Al Guantiano

Tank Information

Tank #	Size (gallons)	Contents	Age	Closure Method	Comments
1)	@5,000	empty	unknown	fill in place	
2)	@5,000	empty	unknown	fill in place	

Intended Closure Date March 28, 1991

Contractor Information

Name: Starks Excavating
Street Address: 14950 M-60
City, State, Zip: Three Rivers MI 49093
Telephone: 616 279 9265
Contact Person: Rick Starks
Certification Number:

Fire Department Information

Department Name: Elkhart Fire Dept.
Street Address: 500 East St.
City, State, Zip: Elkhart, IN 46516
Telephone: 219 293 8931
Contact Person: Steve Gatman

Tank closures must be performed by persons certified by the State Fire Marshal's Office

Tank Owner Signature H. Tomlinson
Date Signed Feb 26, 1991

If the intended closure date is changed please contact IDEM at (317) 243-5022 .

If the site assessment shows signs of soil contamination please call (317) 243-5022 .

Underground Storage Tank Closure Notification Form

Mail 30 days prior to intended tank closure date to:
Indiana Dept. of Environmental Management
Office of Environmental Response
UST Program
P.O. Box 7015
Indianapolis, IN 46207-7015

Tank Owner Information

Owner Name: Mr. Howard Tomlinson
Street Address: 2500 South 17th Street
City, State, Zip: Elkhart, IN 46517
Telephone: (219) 293-5574
Contact Person: Al Guantiano

Tank Location Information

Location Name: Anco Products, Inc.
Street Address: 2500 South 17th Street
City, State, Zip: Elkhart, IN 46517
Telephone: (219) 293-5574
Contact Person: Al Guantiano

Tank Information

Tank #	Size (gallons)	Contents	Age	Closure Method	Comments
1)	@ 5,000	Waste Solvent	unknown	fill with inert material	
2)	@ 5,000	Waste Solvent	unknown	fill with inert material	

Intended Closure Date October 13, 1989

Contractor Information

Name: C.H.E.S. Consultants
Street Address: 716 Lincolnway West
City, State, Zip: Osceola, IN 46561
Telephone: (219) 674-0951
Contact Person: John Wallace

Fire Department Information

Department Name: Elkhart City Fire Dept.
Street Address: 500 East Street
City, State, Zip: Elkhart, IN 46516
Telephone: (219) 293-8931
Contact Person: Dennis Mann

Tank Owner Signature _____

Date Signed _____

If the intended closure date is changed please contact IDEM at (317) 243-5022 .

If the site assessment shows signs of soil contamination please call (317) 243-5022 .

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

105 South Meridian Street
P.O. Box 6015
Indianapolis 46206-6015
Telephone 317/232-8603

January 18, 1990

Mr. H. Tomlinson
Anco Products
2500 South 17th Street
Elkhart, Indiana 46617

Dear Mr. Tomlinson:

This office has received your Notification for Underground Storage Tanks. However, the following requested information was incomplete:

Additional information for tanks permanently taken out of service.

Certification signature in ink.

Enclosed you will find your notification form that is to be completed with the requested information. Please resubmit your notification form within ten (10) days from receipt of this letter. If you have any questions, please contact our office at AC 317/243-5022.

Sincerely,

Anne D. Black

Anne D. Black, Chief
Underground Storage Tank Section
Office of Environmental Response

DD/bo
Enclosure

JAN 1990
RECEIVED

Indiana Department of
Environmental Management
Office of Environmental Response
UST Program
P.O. Box 7015
Indianapolis, IN 46207-7015

Tanks

FORM APPROVED
OMB NO. 2050-0049
APPROVAL EXPIRES 6-30-88

(317) 243-5060

STATE USE ONLY

I.D. Number

Date Received

GENERAL INFORMATION

Notification is required by Federal law for all underground tanks that have been used to store regulated substances since January 1, 1974, that are in the ground as of May 8, 1986, or that are brought into use after May 8, 1986. The information requested is required by Section 9002 of the Resource Conservation and Recovery Act, (RCRA), as amended.

RECEIVED
DEC 21 1989

The primary purpose of this notification program is to locate and evaluate underground tanks that store or have stored petroleum or hazardous substances. It is expected that the information you provide will be based on reasonably available records, or, in the absence of such records, your knowledge, belief, or recollection.

Who Must Notify? Section 9002 of RCRA, as amended, requires that, unless exempted, owners of underground tanks that store regulated substances must notify designated State or local agencies of the existence of their tanks. Owner means—

(a) in the case of an underground storage tank in use on November 8, 1984, or brought into use after that date, any person who owns an underground storage tank used for the storage, use, or dispensing of regulated substances, and

(b) in the case of any underground storage tank in use before November 8, 1984, but no longer in use on that date, any person who owned such tank immediately before the discontinuation of its use.

What Tanks Are Included? Underground storage tank is defined as any one or combination of tanks that (1) is used to contain an accumulation of "regulated substances," and (2) whose volume (including connected underground piping) is 10% or more beneath the ground. Some examples are underground tanks storing: **1.** gasoline, used oil, or diesel fuel, and **2.** industrial solvents, pesticides, herbicides or fumigants.

What Tanks Are Excluded? Tanks removed from the ground are not subject to notification. Other tanks excluded from notification are:

1. farm or residential tanks of 1,100 gallons or less capacity used for storing motor fuel for noncommercial purposes;
2. tanks used for storing heating oil for consumptive use on the premises where stored;
3. septic tanks;
4. pipeline facilities (including gathering lines) regulated under the Natural Gas Pipeline Safety Act of 1968, or the Hazardous Liquid Pipeline Safety Act of 1979, or which is an intrastate pipeline facility regulated under State laws;
5. surface impoundments, pits, ponds, or lagoons;
6. storm water or waste water collection systems;
7. flow-through process tanks;
8. liquid traps or associated gathering lines directly related to oil or gas production and gathering operations;
9. storage tanks situated in an underground area (such as a basement, cellar, mineworking, drift, shaft, or tunnel) if the storage tank is situated upon or above the surface of the floor.

What Substances Are Covered? The notification requirements apply to underground storage tanks that contain regulated substances. This includes any substance defined as hazardous in section 101 (14) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA), with the exception of those substances regulated as hazardous waste under Subtitle C of RCRA. It also includes petroleum, e.g., crude oil or any fraction thereof which is liquid at standard conditions of temperature and pressure (60 degrees Fahrenheit and 14.7 pounds per square inch absolute).

Where To Notify? Completed notification forms should be sent to the address given at the top of this page.

When To Notify? 1. Owners of underground storage tanks in use or that have been taken out of operation after January 1, 1974, but still in the ground, must notify by May 8, 1986. **2.** Owners who bring underground storage tanks into use after May 8, 1986, must notify within 30 days of bringing the tanks into use.

Penalties: Any owner who knowingly fails to notify or submits false information shall be subject to a civil penalty not to exceed $10,000 for each tank for which notification is not given or for which false information is submitted.

INSTRUCTIONS

Please type or print in ink all items except "signature" in Section V. **This form must by completed for each location containing underground storage tanks.** If more than 5 tanks are owned at this location, photocopy the reverse side, and staple continuation sheets to this form.

Indicate number of continuation sheets attached [ ]

I. OWNERSHIP OF TANK(S)

Owner Name (Corporation, Individual, Public Agency, or Other Entity)
Howard Tomlinson, Anco Products

Street Address
2500 South 17th Street

County
Elkhart

City: Elkhart, State: IN ZIP Code: 46617

Area Code: (219) Phone Number: 293-5574

Type of Owner (*Mark all that apply* [X])

[X] Current [ ] Former
[ ] State or Local Gov't
[ ] Federal Gov't (GSA facility I.D. no. _____)
[X] Private or Corporate
[ ] Ownership uncertain

II. LOCATION OF TANK(S)

(If same as Section 1, mark box here [X])

Facility Name or Company Site Identifier, as applicable

Street Address or State Road, as applicable

County

City (nearest) State ZIP Code

Indicate number of tanks at this location: 2

Mark box here if tank(s) are located on land within an Indian reservation or on other Indian trust lands [ ]

JAN 1990
RECEIVED

III. CONTACT PERSON AT TANK LOCATION

Name (If same as Section I, mark box here [ ])
Al Guantiano

Job Title
Maintenance Supervisor

Area Code Phone Number
(219) 293-5574

IV. TYPE OF NOTIFICATION

[ ] Mark box here only if this is an amended or subsequent notification for this location.

V. CERTIFICATION (Read and sign after completing Section VI.)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete.

Name and official title of owner or owner's authorized representative	Signature	Date Signed
Howard Tomlinson, President	[signature]	1/22/90

CONTINUE ON REVERSE SIDE

Owner Name (from Section I) Howard Tomlinson Location (from Section II) 2500 S. 17th Street Page No. 2 of 2 Pages

VI. DESCRIPTION OF UNDERGROUND STORAGE TANKS *(Complete for each tank at this location.)*

Tank Identification No. (e.g., ABC-123), or Arbitrarily Assigned Sequential Number (e.g., 1,2,3...)	Tank No. 1	Tank No. 2	Tank No.	Tank No.	Tank No.
1. Status of Tank *(Mark all that apply ☒)* — Currently in Use	☐	☐	☐	☐	☐
Temporarily Out of Use	☒	☒	☐	☐	☐
Permanently Out of Use	☐	☐	☐	☐	☐
Brought into Use after 5/8/86	☐	☐	☐	☐	☐
2. Estimated Age (Years)	15	15			
3. Estimated Total Capacity (Gallons)	10,000	10,000			
4. Material of Construction *(Mark one ☒)* — Steel	☒	☒	☐	☐	☐
Concrete	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify	Stainless	Stainless			
5. Internal Protection *(Mark all that apply ☒)* — Cathodic Protection	☐	☐	☐	☐	☐
Interior Lining (e.g., epoxy resins)	☐	☐	☐	☐	☐
None	☒	☒	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify					
6. External Protection *(Mark all that apply ☒)* — Cathodic Protection	☐	☐	☐	☐	☐
Painted (e.g., asphaltic)	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic Coated	☐	☐	☐	☐	☐
None	☐	☐	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify	Cement	Cement			
7. Piping *(Mark all that apply ☒)* — Bare Steel	☐	☐	☐	☐	☐
Galvanized Steel	☐	☐	☐	☐	☐
Fiberglass Reinforced Plastic	☐	☐	☐	☐	☐
Cathodically Protected	☐	☐	☐	☐	☐
Unknown	☐	☐	☐	☐	☐
Other, Please Specify	Removed	Removed			
8. Substance Currently or Last Stored in Greatest Quantity by Volume *(Mark all that apply ☒)* — **a. Empty**	☒	☒	☐	☐	☐
b. Petroleum — Diesel	☐	☐	☐	☐	☐
Kerosene	☐	☐	☐	☐	☐
Gasoline (including alcohol blends)	☐	☐	☐	☐	☐
Used Oil	☐	☐	☐	☐	☐
Other, Please Specify					
c. Hazardous Substance	☒	☒	☐	☐	☐
Please Indicate Name of Principal CERCLA Substance	Solvent	Solvent			
OR Chemical Abstract Service (CAS) No.					
Mark box ☒ if tank stores a mixture of substances	☒	☒	☐	☐	☐
d. Unknown	☐	☐	☐	☐	☐
9. Additional Information (for tanks permanently taken out of service) — a. Estimated date last used (mo/yr)	/	/	/	/	/
b. Estimated quantity of substance remaining (gal.)					
c. Mark box ☒ if tank was filled with inert material (e.g., sand, concrete)	☐	☐	☐	☐	☐

☆ U.S. Government Printing Office: 1986—496-735

10

Anco Products, Incorporated
2500 South 17th Street
Elkhart, Indiana

Continuing Investigation Report

As Prepared By:

Industrial Safety and Environmental Services
716 Lincolnway West
Osceola, Indiana 46561

INDUSTRIAL
SAFETY AND
ENVIRONMENTAL
SERVICES

P.O. BOX 233 • OSCEOLA, IN 46561 • PHONE: (219) 259-4138

Mr. Howard Tomlinson
President
Anco Products, Incorporated
2500 South 17th Street
Elkhart, Indiana 46517

April 8, 1993

Dear Howard,

The attached report is intended to provide an overview of studies performed at Anco Products, Incorporated (Project Site). I trust that this information will provide for a more thorough understanding of the work performed relative to chemical constituents present in groundwater at the project site.

Should you have any further questions, please feel free to contact our office at your earliest convenience.

Very Truly Yours,

Tris O. Gour
Industrial Safety and Environmental Services

ENCLOSURE

I. Introduction

Industrial Safety and Environmental Services (ISES) is retained by Anco Products, Incorporated, 2500 South 17th Street, Elkhart, Indiana, (Project Site) to assess current groundwater conditions. As part of this assessment, a groundwater investigation was conducted during February and March 1993. In addition, review of findings from previous investigations conducted at the project site were also reexamined in order to provide for more thorough final documentation. In cases were previous reports prove beneficial to interpretation, they have been included as appendix's of this document. This report presents the findings as of February and March 1993.

II. Site Background

The current building located at 2500 South 17th Street, Elkhart, Indiana, was built on or about 1960. The purpose and intent of the initial structure was that of a warehouse for Central Warehouse of Elkhart, Indiana.

In July 1975, the property was transferred to the Dietzgen Corporation. The facility was then primarily used for paper related product manufacturing. As part of their manufacturing process operation, the Dietzgen Corporation had installed two (2) Underground Storage Tanks (UST's) for chemical product storage. It was learned through interviews with personnel that were employed with the Dietzgen Corporation that the product contained in the UST's was acetone.

Transfer of property from the Dietzgen Corporation to Lee R. Anderson, current owner of Anco Products, Incorporated occurred during June 1977. At present, the project site is engaged in the process of manufacturing insulating products and flexible air ducts. The project site discharges only sanitary wastewater to the Elkhart Publicly Owned Treatment Works (POTW). Water is supplied to the manufacturing facility by the POTW. In addition, there are no drywells, septic/field systems, nor retention basins located at the project site. It should also be stated that the facility does not generate hazardous waste as defined by Environmental Protection Agency (EPA) regulation/definition.

The UST's located at the project site were initially thought to be taken "out of service" when Lee R. Anderson purchased the property. After learning that the UST's had not been removed or closed in place, it was decided by representatives of Anco Products, that closure would take place.

During the time of UST closure, four (4) monitoring wells were installed at the project site. Hollow-stem auger techniques were used with a screened lead auger to evaluate the vertical and lateral extent of potential groundwater constituent plume(s). Four soil borings were drilled and all were converted to monitoring wells. Each borehole was logged by a field operator qualified to identify subsurface conditions. Locations of the monitoring wells are contained in **Appendix I**. All pertinent field and geological data were recorded. Boring locations were chosen judgementally. This method requires a limited knowledge relevant to historical usage of the property including visual assessment methodologies. The project site was assessed for inferred groundwater flow and surface run-off as depicted in the Indiana Department of Natural Resources (IDNR) document; Saint Joseph River Basin, Water Resource Assessment, 87-1.

The measuring point elevations of all installed monitoring wells were surveyed by a registered land surveyor and referenced to a site benchmark. **Table II-1** lists the monitoring well elevations. Locations of the borings are contained in the topography collected and developed by Saylor Land Surveying, 9038 East, 50 North, Mill Creek, Indiana.

Included in the topography are groundwater elevations and groundwater flow as determined by a Hydrogeologist. Directional groundwater flow for the project site is North, Northeast (NNE). It should be stated that the directional flow of NNE is inconsistent with regional flow patterns to the Saint Joseph River Basin, or to the North Northwest (NNW).

The installed monitoring wells consist of a clean sand filter pack installed around the well screen to a level two feet above the top of the screen, followed by a two foot bentonite seal. The annulus of the monitoring well was sealed with a bentonite/cement slurry backfill. The wells were then secured with a locking cap. A generalized flush mount well construction diagram is presented in **Appendix II**. Following the completion of drilling, and installation of the monitoring wells, the monitoring wells were developed using a Geo-Tech hand pump or Teflon Bailer. A minimum of twenty well volumes of the groundwater was purged due to the presence of silty fine grain sands.

Based upon information prepared, reviewed, and submitted, the UST's were closed in accordance with EPA methodology.

ANCO PRODUCTS, INCORPORATED
ELKHART, INDIANA

TABLE 11 - 1

MONITORING WELL ELEVATION (FEET)

MARCH 25, 1993

MONITOR WELL	STATIC LEVEL	TOP OF PVC TO GROUND	TOP OF PVC TO BOTTOM OF THE MONITOR WELL
MW 1	12.5	N/A	23.35
MW 2	15.0	2.75	25.6
MW 3	15.2	2.8	25.4
MW 4	13.9	2.9	25.6

WEATHER CONDITIONS: 50 DEGREES; CLOUDY

Closure documents were filed with the Indiana Department of Environmental Management (IDEM) to include copies of analytical results meeting the criteria for UST closure. Based upon findings, it was determined that the UST's did not impact soil or groundwater at the project site.

As part of additional environmental related concerns, it was decided upon by representatives of Anco Products to conduct annual monitoring of groundwater at the project site. Upon recommendation by engineering/consulting firms, future laboratory analysis of groundwater collected from the monitoring wells will include parameters identified as Volatile Organic Compounds (VOC's).

III. Detection Of TCE And TCA

After closure of the UST's was completed, sampling of the monitoring wells were conducted in December 1990, September 1991, and February 1992. **Table III-1** provides an overview of analytical results from each sampling round.

Contained in **Appendix III** are analytical results from December 1990. Contained in **Appendix IV** are analytical results from September 1991. Contained in **Appendix V** are analytical results from February 1992.

Since laboratory results verified the presence of Trichloroethylene (TCE) and 1,1,1-Trichloroethane (TCA) it was determined that off-site sources should be evaluated to determine if their chemical usage could have impacted the project site.

As part of Anco Products continuing efforts to identify source(s) of TCE and TCA contamination, an "Assessment Update" was prepared by John C. Wallace, Incorporated, South Bend, Indiana, on August 21, 1991. The assessment update is included in **Appendix VI** of this document.

IV. Submission Of Documents To Regulating Agencies

During the course of investigation conducted, it was decided upon by representatives of Anco Products that results of findings would be submitted to the IDEM as part of an information sharing effort. On July 24, 1991, a report prepared by John C. Wallace, Incorporated, South Bend, Indiana, was submitted to Mr. Harry Ackerson, IDEM. This report is contained in **Appendix VII**.

ANCO PRODUCTS, INCORPORATED
ELKHART, INDIANA

TABLE 111 - 1

POSITIVE GROUNDWATER RESULTS

1990 RESULTS

	MW 1	MW 2	MW 3	MW 4
TCE	22	81	6.9	8.9
TCA	ND	ND	4.7	2.6

1991 RESULTS

	MW 1	MW 2	MW 3	MW 4
TCE	13	8.5	64	20
TCA	9.8	3.1	ND	1.2

1993 RESULTS

	MW 1	MW 2	MW 3	MW 4
TCE	17	38	6.8	14
TCA	ND	ND	3.1	3.6

- ALL RESULTS EXPRESSED IN PARTS PER BILLION

At the time of report preparation, it was believed by representatives of Anco Products that TCE was never used at the project site. It was stated in the submitted report that "**Anco Products, Incorporated has never used Trichloroethylene (TCE) in their manufacturing processes**". However, during the course of records reviewed by senior management, it was learned that TCE was used for equipment cleaning purposes. All equipment cleaning was conducted
in-house with the TCE evaporating after it was applied to equipment/machinery components. Application methods were that of "cleaning rags". TCE was never sprayed nor contained in degreasing tanks at the project site which is more consistent with its historical industrial usage. In addition, TCE was never generated as a hazardous waste nor transported off-site as a hazardous waste.

V. Final Discussion

It is the opinion of ISES that elevated levels of TCE, and TCA are not the result of manufacturing operations conducted at the project site.

The manufacturing facility is always found to be in good condition with respect to chemical storage and process operations associated with chemical usage. It is believed that the efforts put forth thus far by Anco Products have been prudent in trying to determine sources for TCE, and TCA contamination.

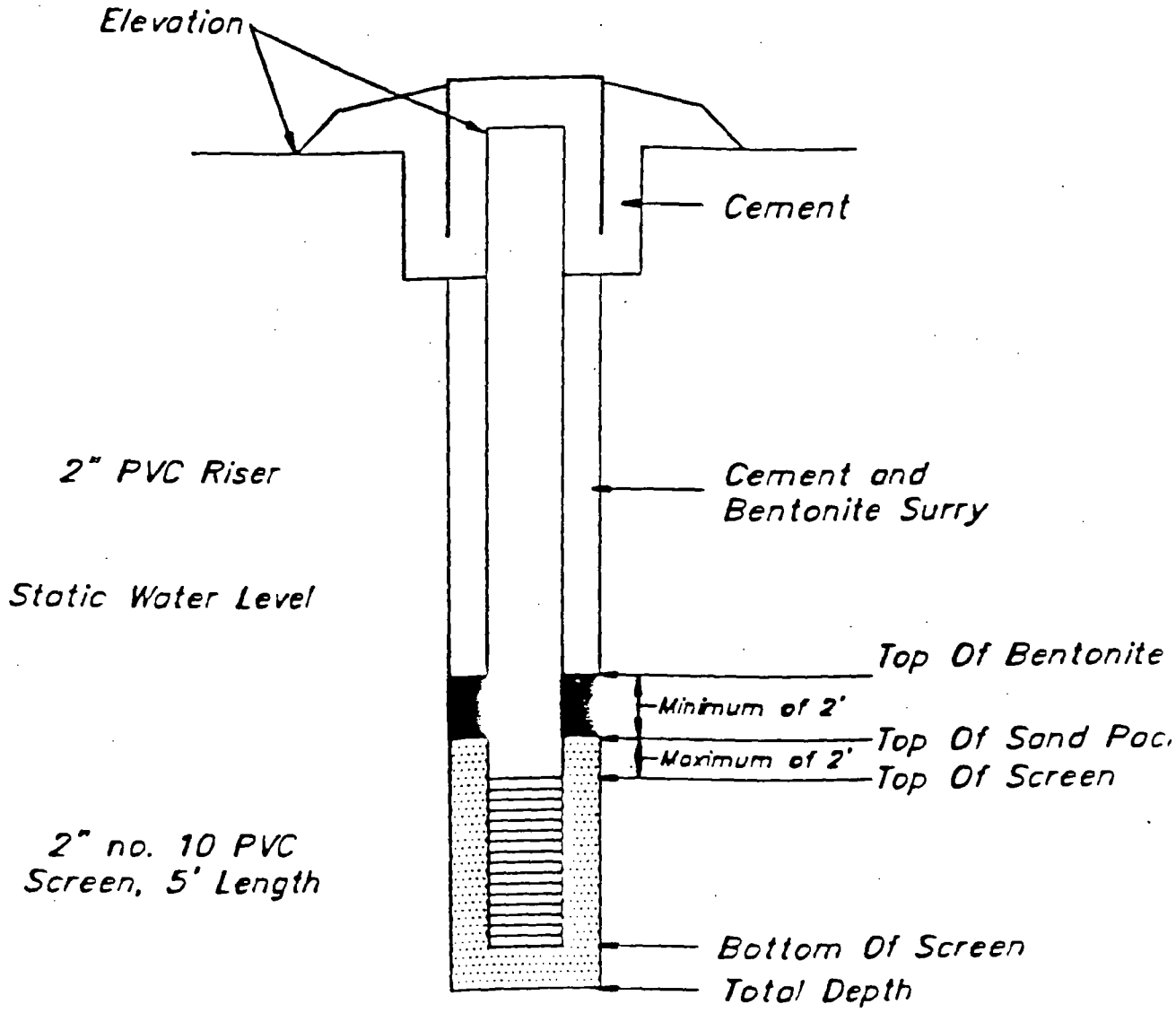
Based upon review of the analytical results, it appears that TCE contamination could be leaving the project site. It is recommended that monitoring of the installed wells be directed on a biannual basis. This effort would assist in determining if TCE is moving off-site.

Should additional information become available concerning the project site or adjacent properties, it may require altering the conclusions of this report. Such information would need to be made available to ISES in the event that the contents would need to be modified.

Should you have any questions, please feel free to contact our office at your earliest convenience.

Industrial Safety and Environmental Services

By:
Tris O. Gour
April 8, 1993



(Not to Scale)

WELL CONSTRUCTION DIAGRAM FOR MONITORING WELLS

MS91901D

Sample description - Anco 1
Anco tank assessment

Sample ID = 90-12-80-1
Parameter: Purgeables(601/02) Date analyzed: December 17, 1990
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	2.6	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	8.9	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco 2
Anco tank assessment

Sample ID = 90-12-80-2
Parameter: Purgeables(601/02) Date analyzed: December 17, 1990
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l	Detection Limit ug/l
Dichlorodifluoromethane	ND	< 1.0
Chloromethane	ND	< 2.0
Vinyl chloride	ND	< 2.0
Chloroethane	ND	< 2.0
Bromoethane	ND	< 1.5
1,1-Dichloroethene	ND	< 0.4
Methylene chloride	ND	< 2.0
t-1,2-Dichloroethene	ND	< 0.2
1,1-Dichloroethane	ND	< 0.3
c-1,2-Dichloroethene	ND	< 0.2
Chloroform	ND	< 1.0
1,1,1-Trichloroethane	4.7	< 0.2
Carbon tetrachloride	ND	< 0.2
Benzene	ND	< 0.4
1,2-Dichloroethane	ND	< 0.2
Trichloroethene	6.9	< 0.5
1,2-Dichloropropane	ND	< 1.0
Bromodichloromethane	ND	< 0.5
2-Chloroethylvinyl ether	ND	< 0.5
t-1,3-Dichloropropene	ND	< 1.0
Toluene	ND	< 0.2
c-1,3-Dichloropropene	ND	< 1.0
1,1,2-Trichloroethane	ND	< 1.0
Tetrachloroethene	ND	< 1.0
Dibromochloromethane	ND	< 1.0
Chlorobenzene	ND	< 0.2
Ethylbenzene	ND	< 0.2
m+p-Xylene	ND	< 0.2
o-Xylene	ND	< 0.2
Bromoform	ND	< 0.9
1,1,2,2-Tetrachloroethane	ND	< 0.7
1,3-Dichlorobenzene	ND	< 0.4
1,4-Dichlorobenzene	ND	< 0.4
1,2-Dichlorobenzene	ND	< 0.4

Analyst: R. S. Lynch

Sample description - Anco 3
Anco tank assessment

Sample ID = 90-12-80-3
Parameter: Purgeables(601/02) Date analyzed: December 17, 1990
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l	
Dichlorodifluoromethane		ND	<	1.0
Chloromethane		ND	<	2.0
Vinyl chloride		ND	<	2.0
Chloroethane		ND	<	2.0
Bromoethane		ND	<	1.5
1,1-Dichloroethene		ND	<	0.4
Methylene chloride		ND	<	2.0
t-1,2-Dichloroethene		ND	<	0.2
1,1-Dichloroethane		ND	<	0.3
c-1,2-Dichloroethene		ND	<	0.2
Chloroform		ND	<	1.0
1,1,1-Trichloroethane		ND	<	0.2
Carbon tetrachloride		ND	<	0.2
Benzene		ND	<	0.4
1,2-Dichloroethane		ND	<	0.2
Trichloroethene	81		<	0.5
1,2-Dichloropropane		ND	<	1.0
Bromodichloromethane		ND	<	0.5
2-Chloroethylvinyl ether		ND	<	0.5
t-1,3-Dichloropropene		ND	<	1.0
Toluene		ND	<	0.2
c-1,3-Dichloropropene		ND	<	1.0
1,1,2-Trichloroethane		ND	<	1.0
Tetrachloroethene		ND	<	1.0
Dibromochloromethane		ND	<	1.0
Chlorobenzene		ND	<	0.2
Ethylbenzene		ND	<	0.2
m+p-Xylene		ND	<	0.2
o-Xylene		ND	<	0.2
Bromoform		ND	<	0.9
1,1,2,2-Tetrachloroethane		ND	<	0.7
1,3-Dichlorobenzene		ND	<	0.4
1,4-Dichlorobenzene		ND	<	0.4
1,2-Dichlorobenzene		ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco 4
Anco tank assessment

Sample ID = 90-12-80-4
Parameter: Purgeables(601/02) Date analyzed: December 17, 1990
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l	
Dichlorodifluoromethane		ND	<	1.0
Chloromethane		ND	<	2.0
Vinyl chloride		ND	<	2.0
Chloroethane		ND	<	2.0
Bromoethane		ND	<	1.5
1,1-Dichloroethene		ND	<	0.4
Methylene chloride		ND	<	2.0
t-1,2-Dichloroethene		ND	<	0.2
1,1-Dichloroethane		ND	<	0.3
c-1,2-Dichloroethene		ND	<	0.2
Chloroform		ND	<	1.0
1,1,1-Trichloroethane		ND	<	0.2
Carbon tetrachloride		ND	<	0.2
Benzene		ND	<	0.4
1,2-Dichloroethane		ND	<	0.2
Trichloroethene	22		<	0.5
1,2-Dichloropropane		ND	<	1.0
Bromodichloromethane		ND	<	0.5
2-Chloroethylvinyl ether		ND	<	0.5
t-1,3-Dichloropropene		ND	<	1.0
Toluene		ND	<	0.2
c-1,3-Dichloropropene		ND	<	1.0
1,1,2-Trichloroethane		ND	<	1.0
Tetrachloroethene		ND	<	1.0
Dibromochloromethane		ND	<	1.0
Chlorobenzene		ND	<	0.2
Ethylbenzene		ND	<	0.2
m+p-Xylene		ND	<	0.2
o-Xylene		ND	<	0.2
Bromoform		ND	<	0.9
1,1,2,2-Tetrachloroethane		ND	<	0.7
1,3-Dichlorobenzene		ND	<	0.4
1,4-Dichlorobenzene		ND	<	0.4
1,2-Dichlorobenzene		ND	<	0.4

Analyst: R. [illegible]

Sample description - Method standard
90-12-39/-43/-64/-80/-98

SAMPLE ID = MSpike
Parameter: PURGEABLES(601&2)
Date analyzed: 12-17-90
Matrix: Water
Analyst: rsl

Compound	Mean ug/l	Spike ug/l	True Spike ug/l	% Recovery
Methylene chloride	0.0	25.1	21.2	118.6
1,1-Dichloroethane	0.0	24.5	21.8	112.3
Chloroform	0.0	24.8	23.0	107.8
1,1,1-Trichloroethane	0.0	24.4	23.1	105.6
1,2-Dichloroethane	0.0	26.8	22.6	118.7
Trichloroethene	0.0	25.3	25.6	98.8
1,2-Dichloropropane	0.0	22.1	22.5	98.4
Toluene	0.0	23.2	21.0	110.7
1,1,2-Trichloroethane	0.0	24.3	24.4	99.6
Tetrachloroethene	0.0	30.9	32.2	96.0
Chlorobenzene	0.0	18.5	22.5	82.4
Ethylbenzene	0.0	20.7	22.1	93.5
m+p-Xylene	0.0	20.5	21.2	96.8
o-Xylene	0.0	19.4	22.4	86.8
1,1,2,2-Tetrachloroethane	0.0	19.8	21.8	90.8
1,3-Dichlorobenzene	0.0	18.3	22.4	81.9
1,4-Dichlorobenzene	0.0	28.5	27.3	104.3
1,2-Dichlorobenzene	0.0	21.3	23.1	92.2

Sample description - ANCO-1 Monitoring Well

Sample ID = 91-09-97-1
Parameter: Purgeables(601/02) Date analyzed: September 24, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l	Detection Limit ug/l
Dichlorodifluoromethane	ND	1.0
Chloromethane	ND	2.0
Vinyl chloride	ND	2.0
Chloroethane	ND	2.0
Bromoethane	ND	1.5
1,1-Dichloroethene	ND	0.4
Methylene chloride	ND	2.0
t-1,2-Dichloroethene	ND	0.2
1,1-Dichloroethane	ND	0.3
c-1,2-Dichloroethene	ND	0.2
Chloroform	ND	1.0
1,1,1-Trichloroethane	9.8	0.2
Carbon tetrachloride	ND	0.2
Benzene	ND	0.4
1,2-Dichloroethane	ND	0.2
Trichloroethene	13	0.5
1,2-Dichloropropane	ND	1.0
Bromodichloromethane	ND	0.5
2-Chloroethylvinyl ether	ND	0.5
t-1,3-Dichloropropene	ND	1.0
Toluene	ND	0.2
c-1,3-Dichloropropene	ND	1.0
1,1,2-Trichloroethane	ND	0.8
Tetrachloroethene	ND	0.5
Dibromochloromethane	ND	1.0
Chlorobenzene	ND	0.2
Ethylbenzene	ND	0.2
m+p-Xylene	ND	0.2
o-Xylene	ND	0.2
Bromoform	ND	0.9
1,1,2,2-Tetrachloroethane	ND	0.7
1,3-Dichlorobenzene	ND	0.4
1,4-Dichlorobenzene	ND	0.4
1,2-Dichlorobenzene	ND	0.4

Claudia R. Donase

Analyst: Claudia R. Donase

Sample description - ANCO-2 Monitoring Well

Sample ID = 91-09-97-2
Parameter: Purgeables(601/02) Date analyzed: September 24, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l	Detection Limit ug/l
Dichlorodifluoromethane	ND	1.0
Chloromethane	ND	2.0
Vinyl chloride	ND	2.0
Chloroethane	ND	2.0
Bromoethane	ND	1.5
1,1-Dichloroethene	ND	0.4
Methylene chloride	ND	2.0
t-1,2-Dichloroethene	ND	0.2
1,1-Dichloroethane	ND	0.3
c-1,2-Dichloroethene	ND	0.2
Chloroform	ND	1.0
1,1,1-Trichloroethane	3.1	0.2
Carbon tetrachloride	ND	0.2
Benzene	ND	0.4
1,2-Dichloroethane	ND	0.2
Trichloroethene	8.5	0.5
1,2-Dichloropropane	ND	1.0
Bromodichloromethane	ND	0.5
2-Chloroethylvinyl ether	ND	0.5
t-1,3-Dichloropropene	ND	1.0
Toluene	ND	0.2
c-1,3-Dichloropropene	ND	1.0
1,1,2-Trichloroethane	1.1	0.8
Tetrachloroethene	ND	0.5
Dibromochloromethane	ND	1.0
Chlorobenzene	ND	0.2
Ethylbenzene	ND	0.2
m+p-Xylene	ND	0.2
o-Xylene	ND	0.2
Bromoform	ND	0.9
1,1,2,2-Tetrachloroethane	ND	0.7
1,3-Dichlorobenzene	ND	0.4
1,4-Dichlorobenzene	ND	0.4
1,2-Dichlorobenzene	ND	0.4

Claudia R. Donase
Analyst: Claudia R. Donase

Sample description - ANCO-3 Monitoring Well

Sample ID = 91-09-97-3
Parameter: Purgeables(601/02) Date analyzed: September 24, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l	Detection Limit ug/l
Dichlorodifluoromethane	ND	1.0
Chloromethane	ND	2.0
Vinyl chloride	ND	2.0
Chloroethane	ND	2.0
Bromoethane	ND	1.5
1,1-Dichloroethene	ND	0.4
Methylene chloride	ND	2.0
t-1,2-Dichloroethene	ND	0.2
1,1-Dichloroethane	ND	0.3
c-1,2-Dichloroethene	ND	0.2
Chloroform	ND	1.0
1,1,1-Trichloroethane	ND	0.2
Carbon tetrachloride	ND	0.2
Benzene	ND	0.4
1,2-Dichloroethane	ND	0.2
Trichloroethene	64	0.5
1,2-Dichloropropane	ND	1.0
Bromodichloromethane	ND	0.5
2-Chloroethylvinyl ether	ND	0.5
t-1,3-Dichloropropene	ND	1.0
Toluene	ND	0.2
c-1,3-Dichloropropene	ND	1.0
1,1,2-Trichloroethane	ND	0.8
Tetrachloroethene	ND	0.5
Dibromochloromethane	ND	1.0
Chlorobenzene	ND	0.2
Ethylbenzene	ND	0.2
m+p-Xylene	ND	0.2
o-Xylene	ND	0.2
Bromoform	ND	0.9
1,1,2,2-Tetrachloroethane	ND	0.7
1,3-Dichlorobenzene	ND	0.4
1,4-Dichlorobenzene	ND	0.4
1,2-Dichlorobenzene	ND	0.4

Claudia R. Donase
Analyst: Claudia R. Donase

Sample description - ANCO-4 Monitoring Well

Sample ID = 91-09-97-4
Parameter: Purgeables(601/02) Date analyzed: September 24, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l	Detection Limit ug/l
Dichlorodifluoromethane	ND	1.0
Chloromethane	ND	2.0
Vinyl chloride	ND	2.0
Chloroethane	ND	2.0
Bromoethane	ND	1.5
1,1-Dichloroethene	ND	0.4
Methylene chloride	ND	2.0
t-1,2-Dichloroethene	ND	0.2
1,1-Dichloroethane	ND	0.3
c-1,2-Dichloroethene	ND	0.2
Chloroform	ND	1.0
1,1,1-Trichloroethane	ND	0.2
Carbon tetrachloride	ND	0.2
Benzene	ND	0.4
1,2-Dichloroethane	ND	0.2
Trichloroethene	20	0.5
1,2-Dichloropropane	ND	1.0
Bromodichloromethane	ND	0.5
2-Chloroethylvinyl ether	ND	0.5
t-1,3-Dichloropropene	ND	1.0
Toluene	ND	0.2
c-1,3-Dichloropropene	ND	1.0
1,1,2-Trichloroethane	1.2	0.8
Tetrachloroethene	ND	0.5
Dibromochloromethane	ND	1.0
Chlorobenzene	ND	0.2
Ethylbenzene	ND	0.2
m+p-Xylene	ND	0.2
o-Xylene	ND	0.2
Bromoform	ND	0.9
1,1,2,2-Tetrachloroethane	ND	0.7
1,3-Dichlorobenzene	ND	0.4
1,4-Dichlorobenzene	ND	0.4
1,2-Dichlorobenzene	ND	0.4

Claudia R. Donase
Analyst: Claudia R. Donase

Environmental Health Laboratories

110 S. Hill Street
South Bend, IN 46617
(219) 233-4777
(219) 233-3272
FAX (219) 233-8207

LABORATORY REPORT

Client: Industrial Safety & Environmental Services
Attn: Tris Gour
716 Lincolnway West
Osceola, IN 46561

Report#: 53250-53

Priority: Standard Written

Status: Final

Project/Site: Anco Products

Samples Submitted: Four groundwater samples

Copies to: None

Collected: 02-10-93 By: Client Received: 02-10-93

REPORT SUMMARY

Volatile Organic Chemicals: The volatile organic chemicals listed below were detected in the water sample submitted for analysis.

Site	Parameter	Results
MW-1	Trichloroethylene	38 µg/L
MW-2	1,1,1-Trichloroethane	3.1 µg/L
	Trichloroethylene	6.8 µg/L
MW-3	1,1,1-Trichloroethane	3.6 µg/L
	Trichloroethylene	14 µg/L
MW-4	Trichloroethylene	17 µg/L

Results of all associated quality control samples were within acceptance limits. No project specific quality control was requested.

This test covers chemical contamination arising from gasoline and other fuels, dry-cleaning and paint solvents, and many other industrial solvents.

Detailed quantitative results are presented on the following pages.

We appreciate the opportunity to provide you with this analysis. If you have any questions concerning this report, please do not hesitate to call us at (219) 233-4777.

REVIEWED BY: Paul Barrett DATE: 03-03-93

FINALIZED BY: Jeff Brown DATE: 03/03/93

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS--Groundwater

Site: MW-1 Lab #: 53250

Parameter	PQL	Results			
Benzene	0.5	<	0.5	µg/L
Bromobenzene	1.0	<	1.0	µg/L
Bromochloromethane	1.0	<	1.0	µg/L
Bromodichloromethane	0.5	<	0.5	µg/L
Bromoform	0.5	<	0.5	µg/L
Bromomethane	2.0	<	2.0	µg/L
n-Butylbenzene	1.0	<	1.0	µg/L
sec-Butylbenzene	1.0	<	1.0	µg/L
tert-Butylbenzene	1.0	<	1.0	µg/L
Carbon tetrachloride	0.5	<	0.5	µg/L
Chlorobenzene	1.0	<	1.0	µg/L
Chloroethane	2.0	<	2.0	µg/L
Chloroform	0.5	<	0.5	µg/L
Chloromethane	2.0	<	2.0	µg/L
1,2-Chlorotoluene	1.0	<	1.0	µg/L
1,4-Chlorotoluene	1.0	<	1.0	µg/L
Dibromochloromethane	0.5	<	0.5	µg/L
1,2-Dibromo-3-Chloropropane	1.0	<	1.0	µg/L
1,2-Dibromoethane(EDB)	1.0	<	1.0	µg/L
Dibromomethane	1.0	<	1.0	µg/L
1,2-Dichlorobenzene	1.0	<	1.0	µg/L
1,3-Dichlorobenzene	1.0	<	1.0	µg/L
1,4-Dichlorobenzene	0.5	<	0.5	µg/L
Dichlorodifluoromethane	1.0	<	1.0	µg/L
1,1-Dichloroethane	1.0	<	1.0	µg/L
1,2-Dichloroethane	0.5	<	0.5	µg/L
1,1-Dichloroethylene	0.5	<	0.5	µg/L
1,2-Dichloroethylene, cis	1.0	<	1.0	µg/L
1,2-Dichloroethylene, trans	1.0	<	1.0	µg/L
Dichloromethane	1.0	<	1.0	µg/L
1,2-Dichloropropane	1.0	<	1.0	µg/L
1,3-Dichloropropane	1.0	<	1.0	µg/L
2,2-Dichloropropane	1.0	<	1.0	µg/L
1,1-Dichloropropylene	1.0	<	1.0	µg/L
1,3-Dichloropropylene, cis	1.0	<	1.0	µg/L

Continued on the following page.

Client: Industrial Safety & Environmental Services Report#: 53250–53

VOLATILE ORGANIC CHEMICALS--Groundwater, continued

Site: MW-1 Lab #: 53250

Parameter	PQL		Results	
1,3-Dichloropropylene,trans	1.0	<	1.0	µg/L
Ethylbenzene	0.5	<	0.5	µg/L
Hexachlorobutadiene	1.0	<	1.0	µg/L
Isopropylbenzene	1.0	<	1.0	µg/L
1,4-Isopropyltoluene	1.0	<	1.0	µg/L
Napthalene	1.0	<	1.0	µg/L
n-Propylbenzene	1.0	<	1.0	µg/L
Styrene	1.0	<	1.0	µg/L
1,1,1,2-Tetrachloroethane	1.0	<	1.0	µg/L
1,1,2,2-Tetrachloroethane	1.0	<	1.0	µg/L
Tetrachloroethylene	1.0	<	1.0	µg/L
Toluene	1.0	<	1.0	µg/L
1,2,3-Trichlorobenzene	1.0	<	1.0	µg/L
1,2,4-Trichlorobenzene	1.0	<	1.0	µg/L
1,1,1-Trichloroethane	0.5	<	0.5	µg/L
1,1,2-Trichloroethane	1.0	<	1.0	µg/L
Trichloroethylene	0.5		**38**	**µg/L**
Trichlorofluoromethane	1.0	<	1.0	µg/L
1,2,3-Trichloropropane	1.0	<	1.0	µg/L
1,2,4-Trimethylbenzene	1.0	<	1.0	µg/L
1,3,5-Trimethylbenzene	1.0	<	1.0	µg/L
Vinyl chloride	0.5	<	0.5	µg/L
Total Xylenes	1.0	<	1.0	µg/L

If dilutions were required for quantitation of specific parameters, they are indicated by a (√) preceeding the result.

Surrogate Standards	Limits (%)	% Recovery Undil
Bromofluorobenzene	86-115	97
1,2-Dichloroethane-d4	76-114	94
Toluene - d8	88-110	97

Analyzed: 02–11–93 Analyst: ES Method: 8260

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS--Groundwater

Site: MW-2 Lab #: 53251

Parameter	PQL	Results		
Benzene	0.5	<	0.5	µg/L
Bromobenzene	1.0	<	1.0	µg/L
Bromochloromethane	1.0	<	1.0	µg/L
Bromodichloromethane	0.5	<	0.5	µg/L
Bromoform	0.5	<	0.5	µg/L
Bromomethane	2.0	<	2.0	µg/L
n-Butylbenzene	1.0	<	1.0	µg/L
sec-Butylbenzene	1.0	<	1.0	µg/L
tert-Butylbenzene	1.0	<	1.0	µg/L
Carbon tetrachloride	0.5	<	0.5	µg/L
Chlorobenzene	1.0	<	1.0	µg/L
Chloroethane	2.0	<	2.0	µg/L
Chloroform	0.5	<	0.5	µg/L
Chloromethane	2.0	<	2.0	µg/L
1,2-Chlorotoluene	1.0	<	1.0	µg/L
1,4-Chlorotoluene	1.0	<	1.0	µg/L
Dibromochloromethane	0.5	<	0.5	µg/L
1,2-Dibromo-3-Chloropropane	1.0	<	1.0	µg/L
1,2-Dibromoethane(EDB)	1.0	<	1.0	µg/L
Dibromomethane	1.0	<	1.0	µg/L
1,2-Dichlorobenzene	1.0	<	1.0	µg/L
1,3-Dichlorobenzene	1.0	<	1.0	µg/L
1,4-Dichlorobenzene	0.5	<	0.5	µg/L
Dichlorodifluoromethane	1.0	<	1.0	µg/L
1,1-Dichloroethane	1.0	<	1.0	µg/L
1,2-Dichloroethane	0.5	<	0.5	µg/L
1,1-Dichloroethylene	0.5	<	0.5	µg/L
1,2-Dichloroethylene, cis	1.0	<	1.0	µg/L
1,2-Dichloroethylene, trans	1.0	<	1.0	µg/L
Dichloromethane	1.0	<	1.0	µg/L
1,2-Dichloropropane	1.0	<	1.0	µg/L
1,3-Dichloropropane	1.0	<	1.0	µg/L
2,2-Dichloropropane	1.0	<	1.0	µg/L
1,1-Dichloropropylene	1.0	<	1.0	µg/L
1,3-Dichloropropylene, cis	1.0	<	1.0	µg/L

Continued on the following page.

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS–Groundwater, continued

Site: MW-2 Lab #: 53251

Parameter	PQL	Results		
1,3-Dichloropropylene,trans	1.0	<	1.0	µg/L
Ethylbenzene	0.5	<	0.5	µg/L
Hexachlorobutadiene	1.0	<	1.0	µg/L
Isopropylbenzene	1.0	<	1.0	µg/L
1,4-Isopropyltoluene	1.0	<	1.0	µg/L
Napthalene	1.0	<	1.0	µg/L
n-Propylbenzene	1.0	<	1.0	µg/L
Styrene	1.0	<	1.0	µg/L
1,1,1,2-Tetrachloroethane	1.0	<	1.0	µg/L
1,1,2,2-Tetrachloroethane	1.0	<	1.0	µg/L
Tetrachloroethylene	1.0	<	1.0	µg/L
Toluene	1.0	<	1.0	µg/L
1,2,3-Trichlorobenzene	1.0	<	1.0	µg/L
1,2,4-Trichlorobenzene	1.0	<	1.0	µg/L
1,1,1-Trichloroethane	0.5		**3.1**	**µg/L**
1,1,2-Trichloroethane	1.0	<	1.0	µg/L
Trichloroethylene	0.5		**6.8**	**µg/L**
Trichlorofluoromethane	1.0	<	1.0	µg/L
1,2,3-Trichloropropane	1.0	<	1.0	µg/L
1,2,4-Trimethylbenzene	1.0	<	1.0	µg/L
1,3,5-Trimethylbenzene	1.0	<	1.0	µg/L
Vinyl chloride	0.5	<	0.5	µg/L
Total Xylenes	1.0	<	1.0	µg/L

If dilutions were required for quantitation of specific parameters, they are indicated by a (√) preceeding the result.

Surrogate Standards	Limits (%)	% Recovery Undil
Bromofluorobenzene	86-115	102
1,2-Dichloroethane-d4	76-114	89
Toluene - d8	88-110	96

Analyzed: 02-11-93 Analyst: ES Method: 8260

Client: Industrial Safety & Environmental Services Report#: 53250–53

VOLATILE ORGANIC CHEMICALS--Groundwater

Site: MW-3 Lab #: 53252

Parameter	PQL	Results		
Benzene	0.5	<	0.5	µg/L
Bromobenzene	1.0	<	1.0	µg/L
Bromochloromethane	1.0	<	1.0	µg/L
Bromodichloromethane	0.5	<	0.5	µg/L
Bromoform	0.5	<	0.5	µg/L
Bromomethane	2.0	<	2.0	µg/L
n-Butylbenzene	1.0	<	1.0	µg/L
sec-Butylbenzene	1.0	<	1.0	µg/L
tert-Butylbenzene	1.0	<	1.0	µg/L
Carbon tetrachloride	0.5	<	0.5	µg/L
Chlorobenzene	1.0	<	1.0	µg/L
Chloroethane	2.0	<	2.0	µg/L
Chloroform	0.5	<	0.5	µg/L
Chloromethane	2.0	<	2.0	µg/L
1,2-Chlorotoluene	1.0	<	1.0	µg/L
1,4-Chlorotoluene	1.0	<	1.0	µg/L
Dibromochloromethane	0.5	<	0.5	µg/L
1,2-Dibromo-3-Chloropropane	1.0	<	1.0	µg/L
1,2-Dibromoethane(EDB)	1.0	<	1.0	µg/L
Dibromomethane	1.0	<	1.0	µg/L
1,2-Dichlorobenzene	1.0	<	1.0	µg/L
1,3-Dichlorobenzene	1.0	<	1.0	µg/L
1,4-Dichlorobenzene	0.5	<	0.5	µg/L
Dichlorodifluoromethane	1.0	<	1.0	µg/L
1,1-Dichloroethane	1.0	<	1.0	µg/L
1,2-Dichloroethane	0.5	<	0.5	µg/L
1,1-Dichloroethylene	0.5	<	0.5	µg/L
1,2-Dichloroethylene, cis	1.0	<	1.0	µg/L
1,2-Dichloroethylene, trans	1.0	<	1.0	µg/L
Dichloromethane	1.0	<	1.0	µg/L
1,2-Dichloropropane	1.0	<	1.0	µg/L
1,3-Dichloropropane	1.0	<	1.0	µg/L
2,2-Dichloropropane	1.0	<	1.0	µg/L
1,1-Dichloropropylene	1.0	<	1.0	µg/L
1,3-Dichloropropylene, cis	1.0	<	1.0	µg/L

Continued on the following page.

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS--Groundwater, continued

Site: MW-3 Lab #: 53252

Parameter	PQL		Results	
1,3-Dichloropropylene,trans	1.0	<	1.0	µg/L
Ethylbenzene	0.5	<	0.5	µg/L
Hexachlorobutadiene	1.0	<	1.0	µg/L
Isopropylbenzene	1.0	<	1.0	µg/L
1,4-Isopropyltoluene	1.0	<	1.0	µg/L
Napthalene	1.0	<	1.0	µg/L
n-Propylbenzene	1.0	<	1.0	µg/L
Styrene	1.0	<	1.0	µg/L
1,1,1,2-Tetrachloroethane	1.0	<	1.0	µg/L
1,1,2,2-Tetrachloroethane	1.0	<	1.0	µg/L
Tetrachloroethylene	1.0	<	1.0	µg/L
Toluene	1.0	<	1.0	µg/L
1,2,3-Trichlorobenzene	1.0	<	1.0	µg/L
1,2,4-Trichlorobenzene	1.0	<	1.0	µg/L
1,1,1-Trichloroethane	0.5		**3.6**	**µg/L**
1,1,2-Trichloroethane	1.0	<	1.0	µg/L
Trichloroethylene	0.5		**14**	**µg/L**
Trichlorofluoromethane	1.0	<	1.0	µg/L
1,2,3-Trichloropropane	1.0	<	1.0	µg/L
1,2,4-Trimethylbenzene	1.0	<	1.0	µg/L
1,3,5-Trimethylbenzene	1.0	<	1.0	µg/L
Vinyl chloride	0.5	<	0.5	µg/L
Total Xylenes	1.0	<	1.0	µg/L

If dilutions were required for quantitation of specific parameters, they are indicated by a (√) preceeding the result.

Surrogate Standards	Limits (%)	% Recovery Undil
Bromofluorobenzene	86-115	107
1,2-Dichloroethane-d4	76-114	88
Toluene - d8	88-110	100

Analyzed: 02-11-93 Analyst: ES Method: 8260

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS--Groundwater

Site: MW-4 Lab #: 53253

Parameter	PQL	Results		
Benzene	0.5	<	0.5	µg/L
Bromobenzene	1.0	<	1.0	µg/L
Bromochloromethane	1.0	<	1.0	µg/L
Bromodichloromethane	0.5	<	0.5	µg/L
Bromoform	0.5	<	0.5	µg/L
Bromomethane	2.0	<	2.0	µg/L
n-Butylbenzene	1.0	<	1.0	µg/L
sec-Butylbenzene	1.0	<	1.0	µg/L
tert-Butylbenzene	1.0	<	1.0	µg/L
Carbon tetrachloride	0.5	<	0.5	µg/L
Chlorobenzene	1.0	<	1.0	µg/L
Chloroethane	2.0	<	2.0	µg/L
Chloroform	0.5	<	0.5	µg/L
Chloromethane	2.0	<	2.0	µg/L
1,2-Chlorotoluene	1.0	<	1.0	µg/L
1,4-Chlorotoluene	1.0	<	1.0	µg/L
Dibromochloromethane	0.5	<	0.5	µg/L
1,2-Dibromo-3-Chloropropane	1.0	<	1.0	µg/L
1,2-Dibromoethane(EDB)	1.0	<	1.0	µg/L
Dibromomethane	1.0	<	1.0	µg/L
1,2-Dichlorobenzene	1.0	<	1.0	µg/L
1,3-Dichlorobenzene	1.0	<	1.0	µg/L
1,4-Dichlorobenzene	0.5	<	0.5	µg/L
Dichlorodifluoromethane	1.0	<	1.0	µg/L
1,1-Dichloroethane	1.0	<	1.0	µg/L
1,2-Dichloroethane	0.5	<	0.5	µg/L
1,1-Dichloroethylene	0.5	<	0.5	µg/L
1,2-Dichloroethylene, cis	1.0	<	1.0	µg/L
1,2-Dichloroethylene, trans	1.0	<	1.0	µg/L
Dichloromethane	1.0	<	1.0	µg/L
1,2-Dichloropropane	1.0	<	1.0	µg/L
1,3-Dichloropropane	1.0	<	1.0	µg/L
2,2-Dichloropropane	1.0	<	1.0	µg/L
1,1-Dichloropropylene	1.0	<	1.0	µg/L
1,3-Dichloropropylene, cis	1.0	<	1.0	µg/L

Continued on the following page.

Client: Industrial Safety & Environmental Services Report#: 53250–53

VOLATILE ORGANIC CHEMICALS--Groundwater, continued

Site: MW-4 Lab #: 53253

Parameter	PQL		Results	
1,3-Dichloropropylene,trans	1.0	<	1.0	µg/L
Ethylbenzene	0.5	<	0.5	µg/L
Hexachlorobutadiene	1.0	<	1.0	µg/L
Isopropylbenzene	1.0	<	1.0	µg/L
1,4-Isopropyltoluene	1.0	<	1.0	µg/L
Napthalene	1.0	<	1.0	µg/L
n-Propylbenzene	1.0	<	1.0	µg/L
Styrene	1.0	<	1.0	µg/L
1,1,1,2-Tetrachloroethane	1.0	<	1.0	µg/L
1,1,2,2-Tetrachloroethane	1.0	<	1.0	µg/L
Tetrachloroethylene	1.0	<	1.0	µg/L
Toluene	1.0	<	1.0	µg/L
1,2,3-Trichlorobenzene	1.0	<	1.0	µg/L
1,2,4-Trichlorobenzene	1.0	<	1.0	µg/L
1,1,1-Trichloroethane	0.5	<	0.5	µg/L
1,1,2-Trichloroethane	1.0	<	1.0	µg/L
Trichloroethylene	0.5		**17**	**µg/L**
Trichlorofluoromethane	1.0	<	1.0	µg/L
1,2,3-Trichloropropane	1.0	<	1.0	µg/L
1,2,4-Trimethylbenzene	1.0	<	1.0	µg/L
1,3,5-Trimethylbenzene	1.0	<	1.0	µg/L
Vinyl chloride	0.5	<	0.5	µg/L
Total Xylenes	1.0	<	1.0	µg/L

If dilutions were required for quantitation of specific parameters, they are indicated by a (√) preceeding the result.

Surrogate Standards	Limits (%)	% Recovery Undil
Bromofluorobenzene	86-115	104
1,2-Dichloroethane-d4	76-114	83
Toluene - d8	88-110	86

Analyzed: 02–11–93 Analyst: ES Method: 8260

Client: Industrial Safety & Environmental Services Report#: 53250-53

REFERENCES AND DEFINITIONS OF TERMS

Volatile Organic Chemical (VOC) Groundwater Analysis
Analytical Technique: Purge & Trap/GC/MS
Reference: EPA Test Methods for Evaluating Solid Waste
SW-846, Third Edition, November 1986

Volatile Organic Chemicals (VOC's) are a group of natural and synthetic organic chemicals characterized by their volatility (ability to evaporate). The volatile chemicals included in this report have been selected by the EPA to be monitored both because of their suspected toxicity and because of their widespread use in industry. Many are used in the production of plastics, clothing and other common items found in most industries.

Practical Quantitation Limits (PQL's) represent the lower limit at which the compounds of interest can be accurately measured, at a 95% confidence level, and reported for a sample exhibiting minimal chemical background interference under the conditions employed in the analytical procedure. PQL's are by definition a function of the instrument performance for an ideal sample and thus are not adjusted for sample dilutions used to calculate results.

Results: Values presented in the result column represent the lowest reportable value for a parameter after correcting for all sample dilutions.

1µg/L = 1 microgram per liter (ug/L) = 1 part per billion

< = "less than". This number is the lowest reportable value by the procedure used for analysis.

John C. Wallace, Inc.

Environmental Consultant
1215 Whitehall Drive
South Bend, Indiana 46615
Telephone 219-233-7141

August 21, 1991

Attn. Mr. Howard Tomlinson
Anco Products
2500 S. 17th St.
Elkhart, IN

RE: Assessment for Risk Evaluation.
Gemeinhardt, Bock, and Lusher Sites

Dear Howard:

I am pleased to submit three (3) copies of this report for an assessment for risk evaluation at Anco Products, 2500 S. Seventeenth Street, Elkhart, Indiana, hereinafter referred to as **project site.**

Background.

The original intent of the site assessment conducted at the project site was to determine the impact, if any, that activities conducted during manufacturing processes, past and present, have had on the environment. This assessment was started by CHES Consultants and documents were released May 12, 1989; Preliminary Assessment, June 20, 1989; sample results and meeting with NBD representative.

During the time of the original assessment two underground storage tanks (USTs) were discovered. It was also discovered that a significant build up of waste material from the manufacturing processes, was known to exist at the base of the dust collection unit. Actions were taken to provide temporary closure of USTs till a formal site assessment for UST closure could be achieved. A system of monitor wells were installed as part of the assessment, to understand the subsurface condition of the project site related to The USTs and the dust collection unit.

Monitor wells were installed in a manner consistent with the inferred groundwater flow, depicted in the Indiana Department of Natural Resource (IDNR) document; St. Joseph River Basin, Water Resource Assessment 87-1. Parameters for analysis were decided upon as related to the products stored in the USTs and the material related to the dust collection unit (acetone, toluene, formaldehyde, phenols).

Samples were taken from the monitor wells in December of 1990 and again in January of 1991. The intent of the samples taken was to provide assessment data for the closure of the USTs. For the purpose of closure, it was only necessary to be concerned with the contents of the USTs (acetone and toluene). EPA Method 601/02 were the parameters requested for the analysis. This method is considered a solvent scan.

Assessment Update
August 21, 1991

It was on receipt of the results for the analysis of the December samples that we learned of trichloroethylene (TCE) being present in the groundwater. Our findings were then confirmed through a second round of sampling, January 24, 1991. The analytical results were received February 1, 1991.

At that time it was decided by Anco Products and John C. Wallace, Inc., that closure of the USTs was of major concern. Dyhydro Analytical Services of Wayne, Michigan, who has provided analytical services throughout the project, agreed to enclose analysis data for compounds; acetone and toluene under a separate letter to be included with closure information, submitted to the Indiana Department of Environmental Management. Closure was achieved through submission of the February 20, 1991 document submitted by John C. Wallace, Inc. and Anco Products.

The findings hereunder are limited to findings of fact and not as to the applicability of the statute for the particular matter, for all such legal opinions advise of legal counsel should be obtained. John C. Wallace, Inc. approaches the legal issues from the point of view of the informed layman.

Gemeinhardt, Bock Industries and Lusher St.

Companies; Gemeinhardt and Bock Industries and the Lusher Street Groundwater Contamination Site, have long been on the state list of Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) properties for Elkhart County. The contamination associated with these sites is TCE. What makes the information for these sites even more confusing, is that the Gemeinhardt property is the only site with a known source for the TCE contamination. There has been much speculation that the origin for the contamination in all three sites has originated at the Gemeinhardt Site.

Gemeinhardt, has in the past, used an injection well for much of the water type waste disposal including degreasing type solvents; TCE. Gemeinhardt took the injection well out of service prior to 1984. Hazardous waste was banned in December of 1984, in a system like the one for the Gemeinhardt site (40 Code of Federal Regulations 144). However, considerable contamination was thought to of originated from the usage. It was also learned, by the IDEM, that the injection well was continually used after it had been thought to be out of service.

In April of 1983 a Consent Decree was issued for violations concerning a known contamination found at the Gemeinhardt location. The order was impart, to refund money to the state for water services provided to area residents and businesses, in the form of water main extension, water hook ups and bottled water for interim periods. The Decree also stated

that an investigation and remedial techniques were to be investigated and decided upon with cooperation with the state agency (IDEM).

In 1984 it was estimated that the contamination extended north, northwest for a distance of one mile. Which included the Bock Industries location. Poor housekeeping practices were observed at the Bock Industries site, and it was also found that TCE was used at this location.

In 1987, Honey RV, Hively Street, contamination was discovered at levels for TCE; 10 ppb. By this time ENSR, a firm from Boston Massachusetts, had begun work as the environmental engineer for Gemeinhardt. As many as sixteen nested monitor wells were placed at various locations throughout the area. Groundwater modeling was completed using these well locations. Attached you will find a map depicting the model of the presumed plume released in a document from ENSR, 1988.

Also in 1987, the Elkhart County Health Department began work on the Lusher Street Project. Again TCE was the main contaminant found. A sixteen block radius was established using Leininger Street, SR 19, 18th Street and Lusher Street as boundaries. It was established that 34% of the wells sampled were contaminated by TCE. The contaminated area included a portion of 17th Street, in that a residential well at 2205 17th was found to have TCE at levels above maximum contamination level (MCL) for drinking water. Again, it appears that the immediate action provided by the state and county was to provide hook up and access to public water. A source for the contamination was never established.

Discussion

While it is consistent, with what is known on the conditions of the local environment, to believe that contamination discovered at the Anco property is a result of impact form offsite sources, it is not easy to determine the exact source, or the direction from which the contamination is coming from. There are several possibilities for sources that can be discussed. The most obvious source, and most likely the **major source**, being that of the Gemeinhardt site. Inferred groundwater flow for the area is depicted in informational sources (USGS topographical maps, IDNR studies) as being north, northwest. For the most part, engineers for ENSR, the firm conducting surveys for Gemeinhardt, have concluded that groundwater flow is consistent at north, northwest. You will notice that a large portion of the plume, as described in the attached map of model results prepared by ENSR, has moved eastward, and apparently the plume has even backed up (Area of nest 2). This is still a model, and is only presumed to be accurate.

There are, of course, inconsistencies within the makeup of subsurface conditions in the soil. These inconsistencies would allow for groundwater to be influenced in different directions. Although the aquifer in the area consists largly of sand and gravel, which allow for groundwater to flow somewhat freely, there are areas of silt and clay. In much of the area within the St. Joseph River there are two

aquifers, an upper unconfined and a lower confined aquifer. These two aquifers are separated by a silt and clay bed. Information suggests that these aquifers are highly transmissive and intersect.

There are other influences on groundwater flow, such as; rivers, creeks, surface water and areas which recharge the aquifer. These do not seem to be prevalent in the immediate area, however, a substantial rise in water levels of nearly two feet were detected during sampling procedures conducted during December 1990, and may of caused additional movement and surface water influence.

It seems the most interesting diversion to the surface and subsurface water flow may be man made. The sewer line runs along Leininger Street. This may allow for water to move along the sewer route, indicating that the source for contamination may be unidentified at present.

Impaired Value

According to a recent publication of the Focus Bulletin published by the Hazardous Materials Institute, Findlay, Ohio, it is estimated that 10% to 40% of commercial properties, and 50% to 90% of industrial properties are "significantly contaminated." "Significantly contaminated" does not imply that the property is not useful or productive. Many "significantly contaminated" properties are probably best left that way and used in a reasonably normal fashion, taking proper precautions. In general, the least risk to

human health and the environment tends to result from the implementation of a long-term management and control programs to govern the risk. This approach to dealing with the presence of environmental risks is wholly consistent with published policies and practices of the government agencies. However, negative environmental impact, such as the impact detected at the property for Anco Products does leave a sense of possible impaired value.

A text book definition of environmentally impaired value would be;

Impaired Value = unimpaired value - stigma - cost to control.

The stigma associated with owning a piece of property such as the Anco property, may only be felt during the time of transfer. Stigma may be viewed as a marketplace reaction to uncertainty. The dollar amount for stigmas associated with properties seem to change periodically. The level of knowledge about the risk source in terms of quantitative information on the amount, location, and methods for dealing with the contaminate, with increasing knowledge decreasing the stigma factor. The contaminant (TCE) itself is considered persistent, and the fact that it is considered a carcinogen, as opposed to a familiar toxin, increases the stigma.

Cost to control/cost to cure, so far, has been more of a sampling and monitoring cost, with review of information as it becomes available from sources such as the Indiana

Department of Environmental Management and the Elkhart County Health Department. The amount of liability for costs is a legal question, and advise of legal counsel should be obtained. The amount of contamination in the area, and number of possible sources, as outlined above, make it increasingly difficult to establish an exact source.

Recommendations.

Continual sampling of the monitor wells has been agreed on previously, and may be appropriate at present. There are several approaches for more definitive answers for establishing the source of contamination. They may not be cost effective or even conclusive, but deserve consideration.

1. The information available at the state offices concerning Gemeinhardt and Bock has been updated since the report released in 1988. This information is available for review at the Indianapolis location for the IDEM. This may be done at a minimal cost.
2. The monitor wells in existence at Anco Products are singularly set for the depth of groundwater. TCE is not a floater. A nest of wells at different depths, should give a more accurate profile as to the extent of contamination.
3. A survey of the monitor wells would give an accurate depiction as to the slope and direction of groundwater flow.

Thank you for allowing us to provide for your environmental concerns. Should there be any questions regarding the information contained herein, or if a cost estimate is desired for the above recommendations, please do not hesitate to contact my office at your earliest convenience.

Very truly yours,

John C. Wallace, Inc.

John C. Wallace

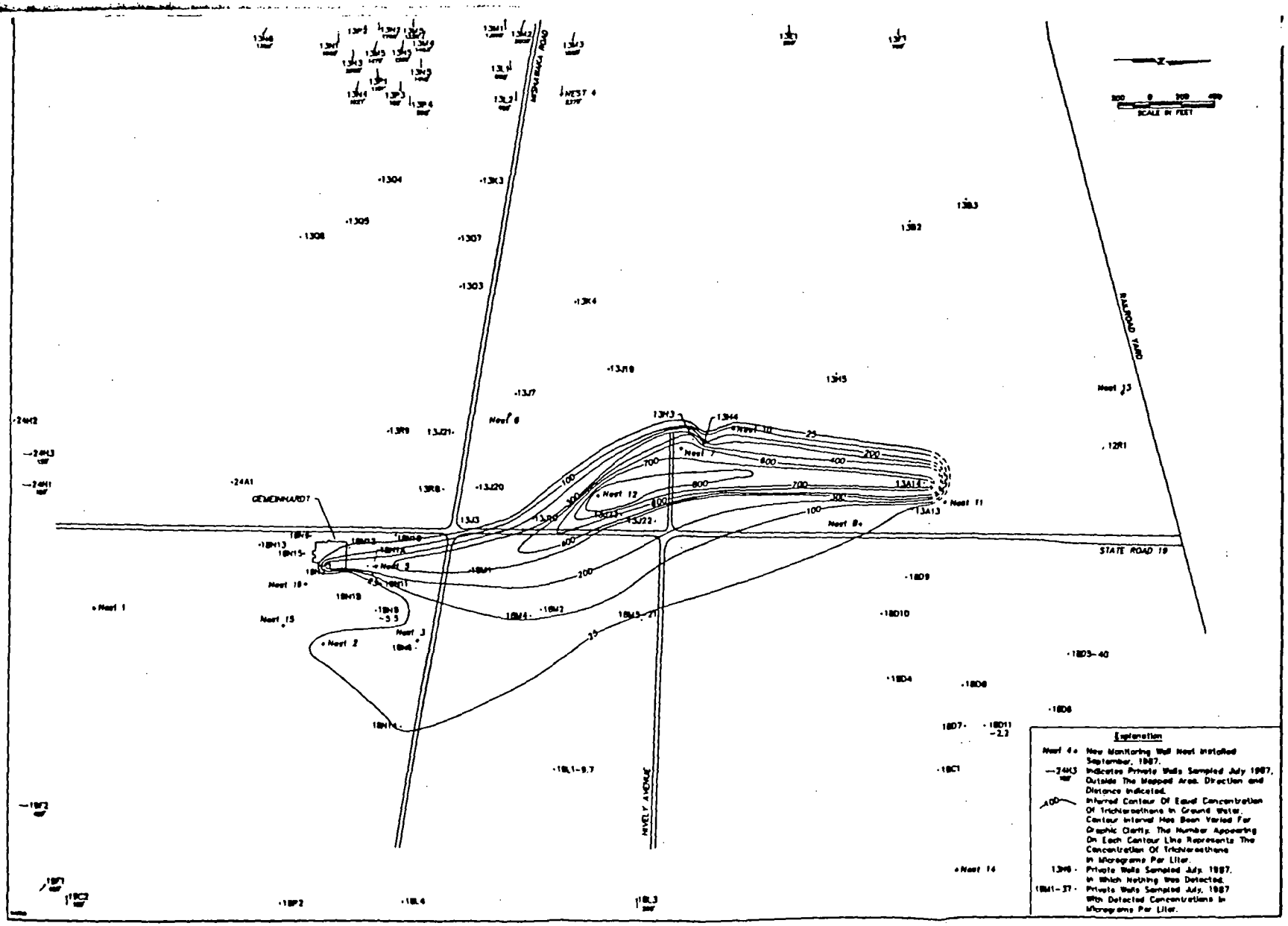


Figure 4-14

Areal Distribution of Trichloroethene from February, 1988 Sampling of New Monitoring Well

Information Sources

Department of Environmental Management, Office of Solid Waste Management and Hazardous Waste Management, Site Investigation Section, CERCLIS Sites.

Indiana Department of Environmental Management, 5500 Bradbury Street, Indianapolis, Indiana (spill files).

Indiana Department of Environmental Management, Underground Storage Tank Program, 2321 Executive Drive, Indianapolis, Indiana.

Environmental Protection Agency, National Priority List, BNA Publications, National Contingency Section.

Guidance on landowner Liability under Section 107(a)(1) of CERCLA, and Settlements with Prospective Purchasers of Contaminated Property: MEMORANDUM; June 6, 1989; USEPA.

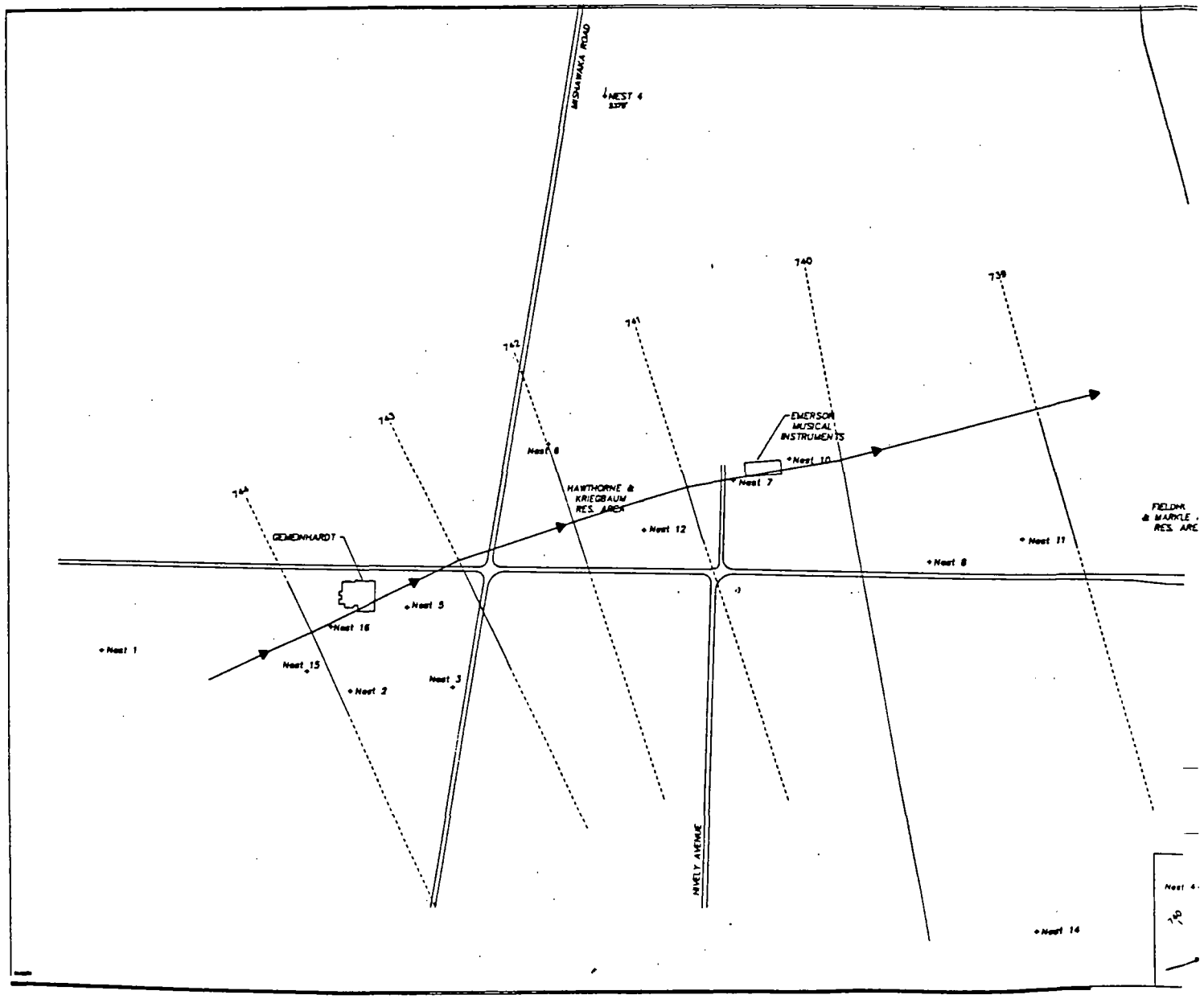
FOCUS "The Bulletin of Environmental Risk Evaluation and Management" Published for Hazardous Materials Institute, Inc., Columbus Ohio.

Hydrologic and Chemical Evaluation of the Groundwater Resources of Northern Elkhart, Investigations 81-53; October 1981.

Anco Assessment Documents, CHES Consultants; released May 12, 1989; Preliminary Assessment, June 20, 1989; sample results, and John C. Wallace, Inc.; released February 20 1990; UST Closure, July 19, 1991; Sharing of Information Notice, Mr. Harry Ackerman, Indiana Department of Environmental Mangement.

MAPS:

United States Department of the Interior Geological Survey, Eastern Elkhart Quadrangle (Topographical).


MISHAWAKA ROAD
NEST 4
740
739
741
742
743
744
EMERSON MUSICAL INSTRUMENTS
Nest 10
Nest 7
Nest 6
HAWTHORNE & KRIEGBAUM RES. AREA
Nest 12
GEMENHARDT
Nest 5
Nest 16
Nest 1
Nest 15
Nest 2
Nest 3
Nest 11
Nest 8
FIELDHA & MARKLE RES. ARE
HIKELY AVENUE
Nest 14
Nest 4

John C. Wallace, Inc.

Environmental Consultant
1215 Whitehall Drive
South Bend, Indiana 46615
Telephone 219-233-7141

July 24, 1991

Attn. Mr. Harry Ackerson
IDEM
Site Investigation Section
105 S. Meridian
Indianapolis, IN 46206-6013

RE: Information Sharing
CERCLIS Sites;
Gemeinhardt and Bock Industries
Elkhart County
Elkhart, Indiana

Dear Mr. Ackerson:

As stated during our phone conversation, July 17, 1991, certain information is available from four monitor wells at a property within approximately 1/4 mile of the area of the above mentioned CERCLIS Sites.

Anco Products, Inc., 2500 S. Seventeenth St., Elkhart, Indiana, is in the business of manufacturing insulated ducting. As part of a business program, unrelated to the concerns addressed in this writing, an environmental property assessment was conducted. Part of the assessment called for the installation of four (4) monitor wells. The monitor wells were placed in manner that would allow a subsurface investigation of the groundwater as it moved on-site (upgradient), and the impact, if any, that the manufacturing processes conducted at Anco Products would have.

In addition to sampling and analysis completed for compounds related to the manufacturing processes conducted at Anco Products, a solvent scan or method 601/02, were parameters also included in the analysis, in part, to determine the impact from adjacent and area manufacturing businesses. Anco Products, became aware of potential contamination during previous investigations of the CERCLIS Sites mentioned above and the Lusher Street investigation. Anco Products, Incorporated has never used Trichloroethylene (TCE) in their manufacturing processes, and asks that you assist them in determining the source and /or the responsible party.

You stated during our phone conversation that it is not uncommon to find TCE in the groundwater in the area. Anco Products, however, is quite concerned as to the impact that local businesses have had on the groundwater, and hopes that the sharing of this information will assist the IDEM in their investigation.

Enclosed you will find; well logs, results of sampling and analysis, and a site map (sketch) depicting monitor well placement.

Thank you for your time and consideration in this matter. If there are any questions regarding the information contained herein, please do not hesitate to contact my office at; 219, 233-7141.

Very truly yours,

John C. Wallace, Inc.

John C. Wallace

Enclosures.

EXHIBIT C

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

2410 Weaver Rd.
Niles, MI 49120
616-684-6269

BORING NO. Well #1 SHEET 1 OF 5

PROJECT ANCO LOCATION ELKHART Ind

JOB NO. ANCO DATE COMPLETED June 7 89 WEATHER Sunny Hot

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 14.3 AFTER 24 HRS. _____

FIELD BORING LOG

DEPTH (From - To)	METHOD	SAMPLE NO.	RECOVERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	N	DESCRIPTION, REMARKS, ETC.
0.0-0.1	SS	1	18"	0.0-1.5	4	7	4		Sandy Top Soil
0.1-1.0	"	2	"	4.5-6.0	2	2	2		Med Dark Brn fine-med Sand
1.0-4.8	"	3	"	9.0-10.5	4	6	10		Med Brn fine-med Sand -
4.8-7.2	"	4	"	13.5-15.0	3	4	5		Loose Brn fine-med Sand Trace
7.2-14.0									Med-Brn - med-coarse Sand - Gravel
14.0-15.0									wet Loose Brn - fine-med - Sand fine Gra
				Augered To 23.0					
				Set Well	18.0 To 23.0. Screen				
									EOB 23.0

RIG NO. CME 75 LOGGED BY Brian Martindale

EXHIBIT C

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

2410 Weaver Rd.
Niles, MI 49120
616-684-6269

BORING NO. Well #2 SHEET 2 OF 4

PROJECT ANCO LOCATION ELKHART - Ind

JOB NO. ANCO DATE COMPLETED June 7 99 WEATHER Sunny HOT

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 14.5 15.3 In well AFTER 24 HRS. _____

FIELD BORING LOG

DEPTH (From - To)	METHOD	SAMPLE NO.	RECOVERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	4	DESCRIPTION, REMARKS, ETC.
0.0 - 0.4	SS	1	18	0.0-1.5	1	3	4		Sandy Top Soil
0.4 - 7.6	"	2	"	4.5-6.0	2	3	3		Loose Brn fine-med Sand Trace gravel
7.6 - 12.0	"	3	"	9.0-10.5	3	4	5		Loose Brn. med-coarse Sand fine gravel
12.0 - 14.4	"	4	"	13.5-15.0	3	5	8		med Brn med - coarse Sand. gravel
14.4 - 15.0									wet, " " " " "
				Augered to 23.0					
				Set screen from 19.0-23.0					

RIG NO. CME 75 LOGGED BY Dan Matuszko

EXHIBIT C

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

2410 Weaver Rd.
Niles, MI 49120
616-684-6269

BORING NO. Well #3 SHEET 3 OF 4

PROJECT ANCO LOCATION Elkhart Ind

JOB NO. ANCO DATE COMPLETED June 7 89 WEATHER Sunny Hot

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 14.0 AFTER 24 HRS. _____

FIELD BORING LOG

DEPTH (From - To)	METHOD	SAMPLE NO.	RECOV-ERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	N	DESCRIPTION, REMARKS, ETC.
0.0 - 0.7	SS	1	18"	0.0-1.5	2	2	2		Sandy Top Soil
0.7 - 3.4	"	2	"	4.5-6.0	2	2	3		Loose Dark Brn Fine-med Sand
3.4 - 7.8	"	3	"	9.0-10.5	3	4	5		Loose Brn Fine-med Sand
7.8 - 14.0	"	4	"	13.5-15.0	4	4	5		Loose Lht Brn Fine Sand
14.0 - 15.0									Loose Brn Med-Coarse Sand - Trace
				Assumed	To	23.0			EOB 23.0
				Set wen	Screen			14.0	-23.0

FIG NO. 5 LOGGED BY [illegible]

EXHIBIT C

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

2410 Weaver Rd.
Niles, MI 49120
616-684-6269

BORING NO. Well #4 SHEET 4 OF 4

PROJECT ANCO LOCATION Elkhart Ind

JOB NO. ANCO DATE COMPLETED June 7 89 WEATHER Sunny Hot!

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 13.8. AFTER 24 HRS. _____

FIELD BORING LOG

DEPTH (From - To)	METHOD	SAMPLE NO.	RECOVERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	4	DESCRIPTION, REMARKS, ETC.
0.0 - 0.2	SS	1	18"	0.0-1.5	Auger	5	6		Asphalt
0.2 - 3.2	"	2	"	4.5-6.0	4	4	5		Med Brn fine - Med - Sand & Trace Silt
3.2 - 4.7	"	3	"	9.0-10.5	4	6	7		Dark Brn Med - Coarse Sand - Trace Silt - gravel
4.7 - 10.4	"	4	"	13.5-15.0	3	7	5		Loose Brn Med - Coarse Sand - gravel
10.4 - 13.8									Med Brn fine Sand
13.8 - 15.0									wet Med Brn - Med - Coarse Sand & gravel
				Augered down to 23.0' EOB 23.0'					
				Set Well Screen					18.0' To 23.0'

RIG NO Crc 75 LOGGED BY Alan Martindale

Sample description - Anco 1
Anco tank assessment

Sample ID = 90-12-80-1
Parameter: Purgeables(601/02) Date analyzed: December 17, 1990
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	2.6	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	8.9	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco 2
Anco tank assessment

Sample ID = 90-12-80-2
Parameter: Purgeables(601/02) Date analyzed: December 17, 1990
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	4.7	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	6.9	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco 3
Anco tank assessment

Sample ID = 90-12-80-3
Parameter: Purgeables(601/02) Date analyzed: December 17, 1990
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l	
Dichlorodifluoromethane		ND	<	1.0
Chloromethane		ND	<	2.0
Vinyl chloride		ND	<	2.0
Chloroethane		ND	<	2.0
Bromoethane		ND	<	1.5
1,1-Dichloroethene		ND	<	0.4
Methylene chloride		ND	<	2.0
t-1,2-Dichloroethene		ND	<	0.2
1,1-Dichloroethane		ND	<	0.3
c-1,2-Dichloroethene		ND	<	0.2
Chloroform		ND	<	1.0
1,1,1-Trichloroethane		ND	<	0.2
Carbon tetrachloride		ND	<	0.2
Benzene		ND	<	0.4
1,2-Dichloroethane		ND	<	0.2
Trichloroethene	81		<	0.5
1,2-Dichloropropane		ND	<	1.0
Bromodichloromethane		ND	<	0.5
2-Chloroethylvinyl ether		ND	<	0.5
t-1,3-Dichloropropene		ND	<	1.0
Toluene		ND	<	0.2
c-1,3-Dichloropropene		ND	<	1.0
1,1,2-Trichloroethane		ND	<	1.0
Tetrachloroethene		ND	<	1.0
Dibromochloromethane		ND	<	1.0
Chlorobenzene		ND	<	0.2
Ethylbenzene		ND	<	0.2
m+p-Xylene		ND	<	0.2
o-Xylene		ND	<	0.2
Bromoform		ND	<	0.9
1,1,2,2-Tetrachloroethane		ND	<	0.7
1,3-Dichlorobenzene		ND	<	0.4
1,4-Dichlorobenzene		ND	<	0.4
1,2-Dichlorobenzene		ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco 4
Anco tank assessment

Sample ID = 90-12-80-4
Parameter: Purgeables(601/02) Date analyzed: December 17, 1990
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l	
Dichlorodifluoromethane		ND	<	1.0
Chloromethane		ND	<	2.0
Vinyl chloride		ND	<	2.0
Chloroethane		ND	<	2.0
Bromoethane		ND	<	1.5
1,1-Dichloroethene		ND	<	0.4
Methylene chloride		ND	<	2.0
t-1,2-Dichloroethene		ND	<	0.2
1,1-Dichloroethane		ND	<	0.3
c-1,2-Dichloroethene		ND	<	0.2
Chloroform		ND	<	1.0
1,1,1-Trichloroethane		ND	<	0.2
Carbon tetrachloride		ND	<	0.2
Benzene		ND	<	0.4
1,2-Dichloroethane		ND	<	0.2
Trichloroethene	22		<	0.5
1,2-Dichloropropane		ND	<	1.0
Bromodichloromethane		ND	<	0.5
2-Chloroethylvinyl ether		ND	<	0.5
t-1,3-Dichloropropene		ND	<	1.0
Toluene		ND	<	0.2
c-1,3-Dichloropropene		ND	<	1.0
1,1,2-Trichloroethane		ND	<	1.0
Tetrachloroethene		ND	<	1.0
Dibromochloromethane		ND	<	1.0
Chlorobenzene		ND	<	0.2
Ethylbenzene		ND	<	0.2
m+p-Xylene		ND	<	0.2
o-Xylene		ND	<	0.2
Bromoform		ND	<	0.9
1,1,2,2-Tetrachloroethane		ND	<	0.7
1,3-Dichlorobenzene		ND	<	0.4
1,4-Dichlorobenzene		ND	<	0.4
1,2-Dichlorobenzene		ND	<	0.4

Analyst: R. S. Lynch

Sample description - Method standard
90-12-39/-43/-64/-80/-98

SAMPLE ID = MSpike
Parameter: PURGEABLES(601&2)
Date analyzed: 12-17-90
Matrix: Water
Analyst: rsl

Compound	Mean ug/l	Spike ug/l	True Spike ug/l	% Recovery
Methylene chloride	0.0	25.1	21.2	118.6
1,1-Dichloroethane	0.0	24.5	21.8	112.3
Chloroform	0.0	24.8	23.0	107.8
1,1,1-Trichloroethane	0.0	24.4	23.1	105.6
1,2-Dichloroethane	0.0	26.8	22.6	118.7
Trichloroethene	0.0	25.3	25.6	98.8
1,2-Dichloropropane	0.0	22.1	22.5	98.4
Toluene	0.0	23.2	21.0	110.7
1,1,2-Trichloroethane	0.0	24.3	24.4	99.6
Tetrachloroethene	0.0	30.9	32.2	96.0
Chlorobenzene	0.0	18.5	22.5	82.4
Ethylbenzene	0.0	20.7	22.1	93.5
m+p-Xylene	0.0	20.5	21.2	96.8
o-Xylene	0.0	19.4	22.4	86.8
1,1,2,2-Tetrachloroethane	0.0	19.8	21.8	90.8
1,3-Dichlorobenzene	0.0	18.3	22.4	81.9
1,4-Dichlorobenzene	0.0	28.5	27.3	104.3
1,2-Dichlorobenzene	0.0	21.3	23.1	92.2

Sample description - Anco-1A MW-1
Anco tank assessment

Sample ID = 91-01-148-1
Parameter: Purgeables(601/02) Date analyzed: January 25, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	4.8	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	16	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco-2A MW-2
Anco tank assessment

Sample ID = 91-01-148-2
Parameter: Purgeables(601/02) Date analyzed: January 25, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	6.0	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	9.1	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	1.1	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

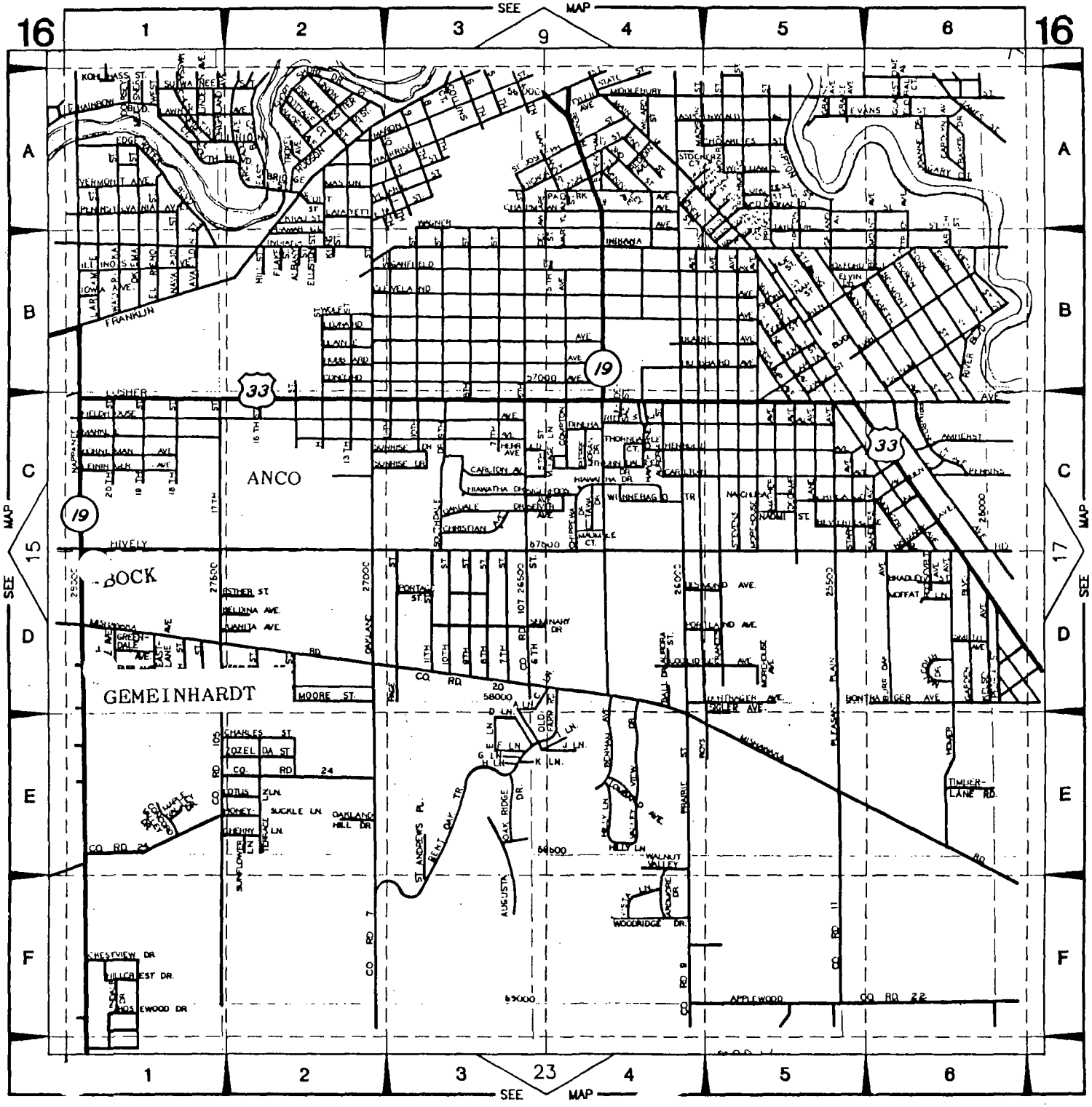
Analyst: R. S. Lynch

Sample description - Anco 4A MW-4
Anco tank assessment

Sample ID = 91-01-148A-4
Parameter: Purgeables(601/02) Date analyzed: February 18, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	ND	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	21	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch


16
1
2
3
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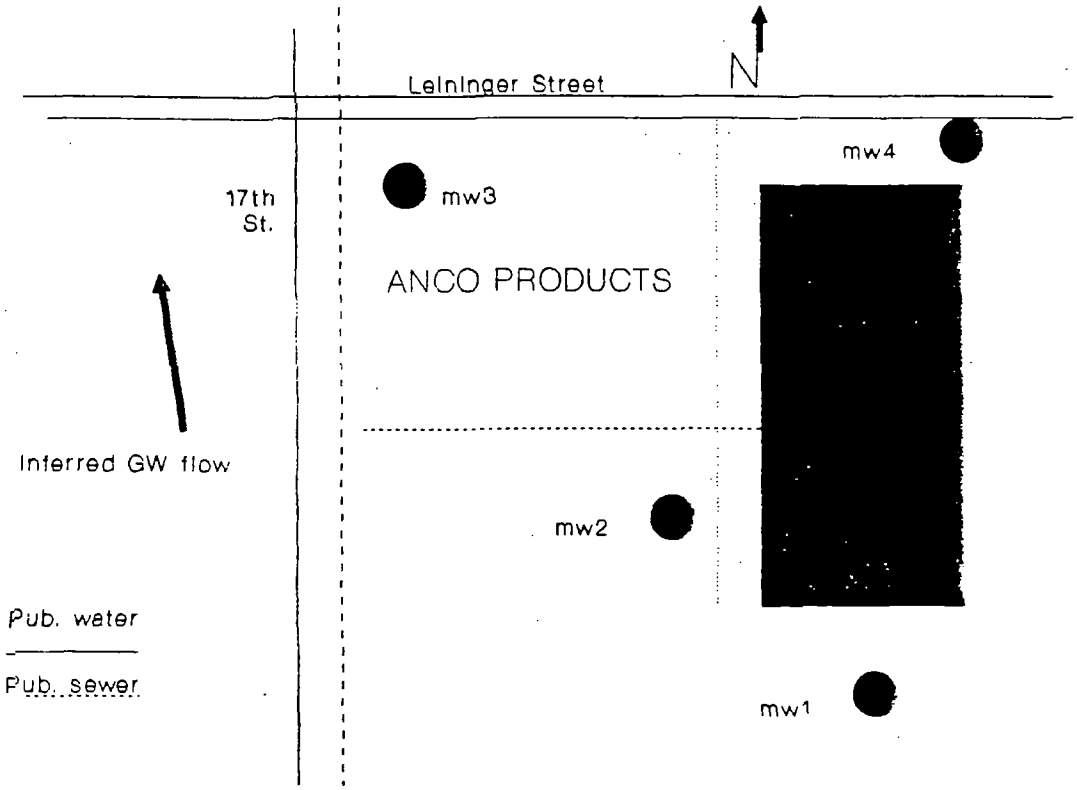
6
SEE MAP 9
SEE MAP 23
SEE MAP 15
SEE MAP 17
A
B
C
D
E
F
ANCO
BOCK
GEMEINHARDT
FRANKLIN
HIVELY
FISHER
MOORE ST.
CO. RD. 24
CO. RD. 23
CO. RD. 22
CO. RD. 7
CO. RD. 20
CO. RD. 11
CO. RD. 9
APPLEWOOD
WOODRIDGE DR.
WALNUT VALLEY
ST. ANDREWS PL.
AUGUSTA
OAK RIDGE DR.
OAKLAND HILL DR.
CHARLES ST.
ZOZELDA ST.
LOTUS LN.
HONEYSUCKLE LN.
SUNFLOWER LN.
CRESTVIEW DR.
HILLCREST DR.
ROSEWOOD DR.
ESTHER ST.
BELINDA AVE.
JUANITA AVE.
GREENDALE AVE.
EASTLANE ST.
OAKLAND
MISSOURI
MIDDLEBURY
EVANS
STATE
HOLLINS
HARRISON
HUDSON
MASON
WOOLF
WOOSTER
WOODLAND
CLEVELAND
ELAINE
DINAHA
THORNWOOD CT.
CARLTON AVE.
HIAWATHA DR.
WINNEBAGO TR.
OBSIDIAN
SOUTHDALE
PROSPECT AVE.
NAOMI ST.
HOPEHOUSE
STEVENS
AMHERST
PENDING
ELVIN
RIVER BLVD.
HOLLAND AVE.
MORGAN AVE.
MORGAN CT.
MORGHOUSE AVE.
WHITTIER AVE.
FULLER AVE.
BONTHA BRIGER AVE.
BRADLEY
MOFFAT
PLEASANT PLAIN
TIMBER-LANE RD.
HOMER
FRANKLIN
PRAIRIE
BONHAM AVE.
HILLY LN.
HILLY VIEW
OLD CORP
SEMINARY DR.
FONTANA ST.
ALDRICH
ALBANY
ELLIS
BRIDGE
EDGE
VERMONT AVE.
PENNSYLVANIA AVE.
ILLINOIS
IOWA AVE.
LARAMIE
NEVADA
RENO
OKLAHOMA
AVA
19
33


Leininger Street
N
mw4
17th
St.
mw3
ANCO PRODUCTS
Inferred GW flow
mw2
Pub. water
Pub. sewer
mw1

Anco Products, Incorporated
2500 South 17th Street
Elkhart, Indiana

Continuing Investigation Report

As Prepared By:

Industrial Safety and Environmental Services
716 Lincolnway West
Osceola, Indiana 46561

INDUSTRIAL
SAFETY AND
ENVIRONMENTAL
SERVICES

P.O. BOX 233 • OSCEOLA, IN 46561 • PHONE: (219) 259-4138

Mr. Howard Tomlinson
President
Anco Products, Incorporated
2500 South 17th Street
Elkhart, Indiana 46517

May 28, 1993

Re: Amended Report

Dear Howard,

Per request of Mr. Donn Wray, Plews & Shadley, 1346 North Delaware Street, Indianapolis, Indiana, enclosed you will find a copy of the amended "Continuing Investigation Report". The changes which Mr. Wray requested were specifically dealing with the section pertaining to how TCE usage was discovered.

I appreciate the input from Mr. Wray, and will be forwarding two (2) original copies to him, as well as one (1) original copy to you. It is my understanding that he will be forwarding a copy to the Indiana Department of Environmental Management for their records.

Should you or any reviewers of the amended report have additional questions, please feel free to contact me at your earliest convenience.

Very Truly Yours,

Tris O. Gour
Industrial Safety and Environmental Services

TOG/mkn

Enclosure

cc: Mr. Donn Wray, Plews & Shadley, w/enclosures

I. Introduction

Industrial Safety and Environmental Services (ISES) is retained by Anco Products, Incorporated, 2500 South 17th Street, Elkhart, Indiana, (Project Site) to assess current groundwater conditions. As part of this assessment, a groundwater investigation was conducted during February and March 1993. In addition, review of findings from previous investigations conducted at the project site were also reexamined in order to provide for more thorough final documentation. In cases were previous reports prove beneficial to interpretation, they have been included as appendix's of this document. This report presents the findings as of February and March 1993.

II. Site Background

The current building located at 2500 South 17th Street, Elkhart, Indiana, was built on or about 1960. The purpose and intent of the initial structure was that of a warehouse for Central Warehouse of Elkhart, Indiana.

In July 1975, the property was transferred to the Dietzgen Corporation. The facility was then primarily used for paper related product manufacturing. As part of their manufacturing process operation, the Dietzgen Corporation had installed two (2) Underground Storage Tanks (UST's) for chemical product storage. It was learned through interviews with personnel that were employed with the Dietzgen Corporation that the product contained in the UST's was acetone.

Transfer of property from the Dietzgen Corporation to Lee R. Anderson, current owner of Anco Products, Incorporated occurred during June 1977. At present, the project site is engaged in the process of manufacturing insulating products and flexible air ducts. The project site discharges only sanitary wastewater to the Elkhart Publicly Owned Treatment Works (POTW). Water is supplied to the manufacturing facility by the POTW. In addition, there are no drywells, septic/field systems, nor retention basins located at the project site. It should also be stated that the facility does not generate hazardous waste as defined by Environmental Protection Agency (EPA) regulation/definition.

The UST's located at the project site were initially thought to be taken "out of service" when Lee R. Anderson purchased the property. After learning that the UST's had not been removed or closed in place, it was decided by representatives of Anco Products, that closure would take place.

During the time of UST closure, four (4) monitoring wells were installed at the project site. Hollow-stem auger techniques were used with a screened lead auger to evaluate the vertical and lateral extent of potential groundwater constituent plume(s). Four soil borings were drilled and all were converted to monitoring wells. Each borehole was logged by a field operator qualified to identify subsurface conditions. Locations of the monitoring wells are contained in **Appendix I**. All pertinent field and geological data were recorded. Boring locations were chosen judgementally. This method requires a limited knowledge relevant to historical usage of the property including visual assessment methodologies. The project site was assessed for inferred groundwater flow and surface run-off as depicted in the Indiana Department of Natural Resources (IDNR) document; Saint Joseph River Basin, Water Resource Assessment, 87-1.

The measuring point elevations of all installed monitoring wells were surveyed by a registered land surveyor and referenced to a site benchmark. **Table II-1** lists the monitoring well elevations. Locations of the borings are contained in the topography collected and developed by Saylor Land Surveying. 9038 East, 50 North, Mill Creek, Indiana.

Included in the topography are groundwater elevations and groundwater flow as determined by a Hydrogeologist. Directional groundwater flow for the project site is North, Northeast (NNE). It should be stated that the directional flow of NNE is inconsistent with regional flow patterns to the Saint Joseph River Basin, or to the North Northwest (NNW).

The installed monitoring wells consist of a clean sand filter pack installed around the well screen to a level two feet above the top of the screen, followed by a two foot bentonite seal. The annulus of the monitoring well was sealed with a bentonite/cement slurry backfill. The wells were then secured with a locking cap. A generalized flush mount well construction diagram is presented in **Appendix II**. Following the completion of drilling, and installation of the monitoring wells, the monitoring wells were developed using a Geo-Tech hand pump or Teflon Bailer. A minimum of twenty well volumes of the groundwater was purged due to the presence of silty fine grain sands.

Based upon information prepared, reviewed, and submitted, the UST's were closed in accordance with EPA methodology.

ANCO PRODUCTS, INCORPORATED
ELKHART, INDIANA

TABLE 11 - 1

MONITORING WELL ELEVATION (FEET)

MARCH 25, 1993

MONITOR WELL	STATIC LEVEL	TOP OF PVC TO GROUND	TOP OF PVC TO BOTTOM OF THE MONITOR WELL
MW 1	12.5	N/A	23.35
MW 2	15.0	2.75	25.6
MW 3	15.2	2.8	25.4
MW 4	13.9	2.9	25.6

WEATHER CONDITIONS: 50 DEGREES; CLOUDY

Closure documents were filed with the Indiana Department of Environmental Management (IDEM) to include copies of analytical results meeting the criteria for UST closure. Based upon findings, it was determined that the UST's did not impact soil or groundwater at the project site.

As part of additional environmental related concerns, it was decided upon by representatives of Anco Products to conduct annual monitoring of groundwater at the project site. Upon recommendation by engineering/consulting firms, future laboratory analysis of groundwater collected from the monitoring wells will include parameters identified as Volatile Organic Compounds (VOC's).

III. Detection Of TCE And TCA

After closure of the UST's was completed, sampling of the monitoring wells were conducted in December 1990, September 1991, and February 1992. **Table III-1** provides an overview of analytical results from each sampling round.

Contained in **Appendix III** are analytical results from December 1990. Contained in **Appendix IV** are analytical results from September 1991. Contained in **Appendix V** are analytical results from February 1992.

Since laboratory results verified the presence of Trichloroethylene (TCE) and 1,1,1-Trichloroethane (TCA) it was determined that off-site sources should be evaluated to determine if their chemical usage could have impacted the project site.

As part of Anco Products continuing efforts to identify source(s) of TCE and TCA contamination, an "Assessment Update" was prepared by John C. Wallace, Incorporated, South Bend, Indiana, on August 21, 1991. The assessment update is included in **Appendix VI** of this document.

IV. Submission Of Documents To Regulating Agencies

During the course of investigation conducted, it was decided upon by representatives of Anco Products that results of findings would be submitted to the IDEM as part of an information sharing effort. On July 24, 1991, a report prepared by John C. Wallace, Incorporated, South Bend, Indiana, was submitted to Mr. Harry Ackerson, IDEM. This report is contained in **Appendix VII**.

ANCO PRODUCTS, INCORPORATED
ELKHART, INDIANA

TABLE 111 - 1

POSITIVE GROUNDWATER RESULTS

1990 RESULTS

	MW 1	MW 2	MW 3	MW 4
TCE	22	81	6.9	8.9
TCA	ND	ND	4.7	2.6

1991 RESULTS

	MW 1	MW 2	MW 3	MW 4
TCE	13	8.5	64	20
TCA	9.8	3.1	ND	1.2

1993 RESULTS

	MW 1	MW 2	MW 3	MW 4
TCE	17	38	6.8	14
TCA	ND	ND	3.1	3.6

- ALL RESULTS EXPRESSED IN PARTS PER BILLION

At the time of report preparation, it was believed by representatives of Anco Products that TCE was never used at the project site. It was stated in the submitted report that "**Anco Products, Incorporated has never used Trichloroethylene (TCE) in their manufacturing processes**". However, during the course of records reviewed by senior management in December 1992 as a result of a request for production of documents to a non-party resulting from a lawsuit, it was learned that TCE was used for equipment cleaning purposes in the late 1970's and early 1980's. All equipment cleaning was conducted in-house with the TCE evaporating after it was applied to equipment/machinery components. Application methods were that of "cleaning rags". TCE was never sprayed nor contained in degreasing tanks at the project site which is more consistent with its historical industrial usage. In addition, TCE was never generated as a hazardous waste nor transported off-site as a hazardous waste.

V. Final Discussion

It is the opinion of ISES that elevated levels of TCE, and TCA are not the result of manufacturing operations conducted at the project site.

The manufacturing facility is always found to be in good condition with respect to chemical storage and process operations associated with chemical usage. It is believed that the efforts put forth thus far by Anco Products have been prudent in trying to determine sources for TCE, and TCA contamination.

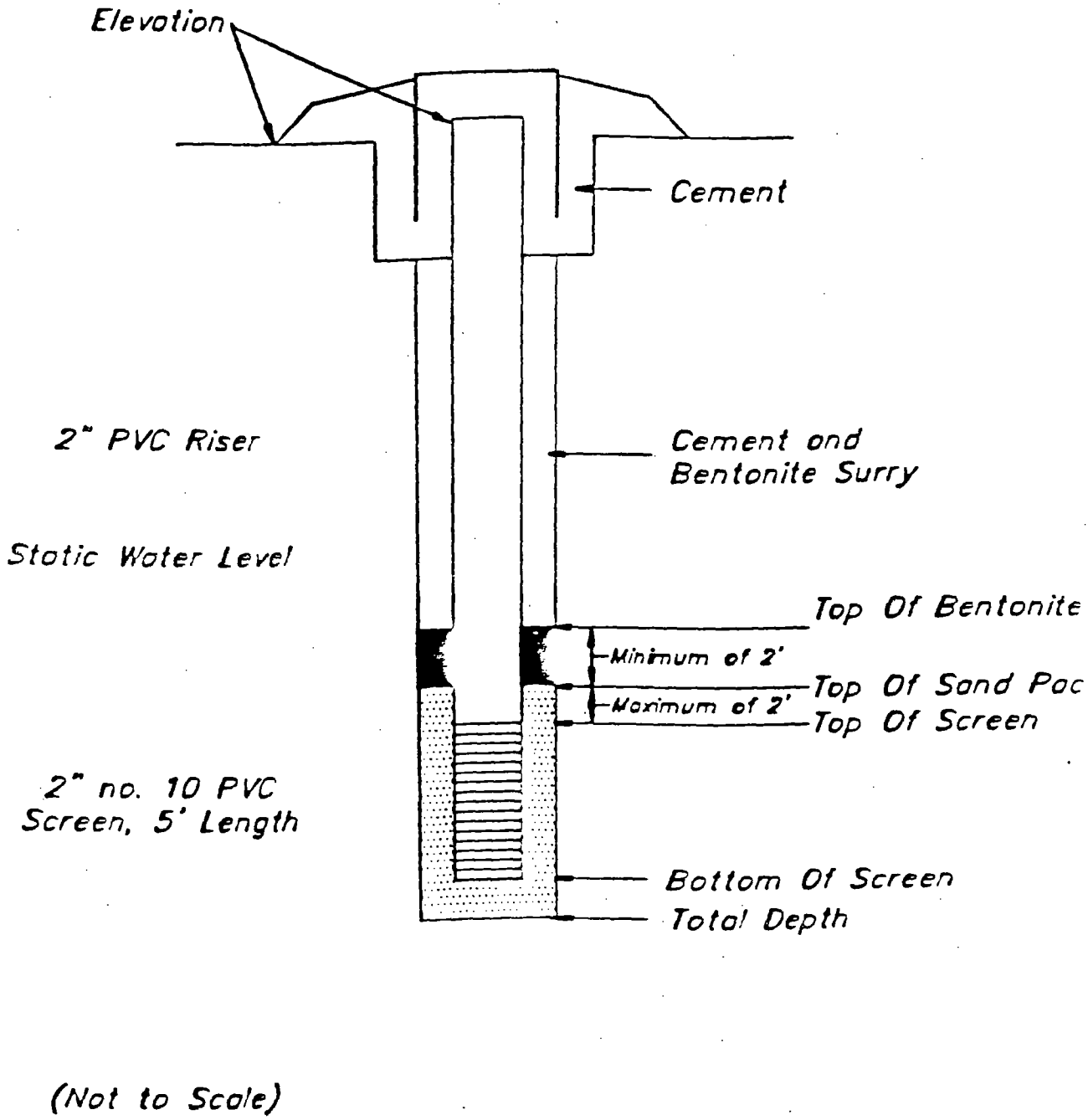
Based upon review of the analytical results, it appears that TCE contamination could be leaving the project site. It is recommended that monitoring of the installed wells be directed on a biannual basis. This effort would assist in determining if TCE is moving off-site.

Should additional information become available concerning the project site or adjacent properties, it may require altering the conclusions of this report. Such information would need to be made available to ISES in the event that the contents would need to be modified.

Should you have any questions, please feel free to contact our office at your earliest convenience.

Industrial Safety and Environmental Services

By:
Tris O. Gour
April 8, 1993



WELL CONSTRUCTION DIAGRAM FOR MONITORING WELLS

MS91901D

Sample description - Anco 1
Anco tank assessment

Sample ID = 90-12-80-1
Parameter: Purgeables(601/02) Date analyzed: December 17, 1990
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	2.6	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	8.9	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco 2
Anco tank assessment

Sample ID = 90-12-80-2
Parameter: Purgeables(601/02) Date analyzed: December 17, 1990
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	4.7	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	6.9	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco 3
Anco tank assessment

Sample ID = 90-12-80-3
Parameter: Purgeables(601/02)
Matrix: Water

Date analyzed: December 17, 1990
Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	ND	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	81	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco 4
Anco tank assessment

Sample ID = 90-12-80-4
Parameter: Purgeables(601/02) Date analyzed: December 17, 1990
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	ND	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	22	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. G. Eyne

Sample description - Method standard
90-12-39/-43/-64/-80/-98

SAMPLE ID = MSpike
Parameter: PURGEABLES(601&2)
Date analyzed: 12-17-90
Matrix: Water
Analyst: rsl

Compound	Mean ug/l	Spike ug/l	True Spike ug/l	% Recovery
Methylene chloride	0.0	25.1	21.2	118.6
1,1-Dichloroethane	0.0	24.5	21.8	112.3
Chloroform	0.0	24.8	23.0	107.8
1,1,1-Trichloroethane	0.0	24.4	23.1	105.6
1,2-Dichloroethane	0.0	26.8	22.6	118.7
Trichloroethene	0.0	25.3	25.6	98.8
1,2-Dichloropropane	0.0	22.1	22.5	98.4
Toluene	0.0	23.2	21.0	110.7
1,1,2-Trichloroethane	0.0	24.3	24.4	99.6
Tetrachloroethene	0.0	30.9	32.2	96.0
Chlorobenzene	0.0	18.5	22.5	82.4
Ethylbenzene	0.0	20.7	22.1	93.5
m+p-Xylene	0.0	20.5	21.2	96.8
o-Xylene	0.0	19.4	22.4	86.8
1,1,2,2-Tetrachloroethane	0.0	19.8	21.8	90.8
1,3-Dichlorobenzene	0.0	18.3	22.4	81.9
1,4-Dichlorobenzene	0.0	28.5	27.3	104.3
1,2-Dichlorobenzene	0.0	21.3	23.1	92.2

Sample description - ANCO-1 Monitoring Well

Sample ID = 91-09-97-1
Parameter: Purgeables(601/02) Date analyzed: September 24, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l	Detection Limit ug/l
Dichlorodifluoromethane	ND	1.0
Chloromethane	ND	2.0
Vinyl chloride	ND	2.0
Chloroethane	ND	2.0
Bromoethane	ND	1.5
1,1-Dichloroethene	ND	0.4
Methylene chloride	ND	2.0
t-1,2-Dichloroethene	ND	0.2
1,1-Dichloroethane	ND	0.3
c-1,2-Dichloroethene	ND	0.2
Chloroform	ND	1.0
1,1,1-Trichloroethane	9.8	0.2
Carbon tetrachloride	ND	0.2
Benzene	ND	0.4
1,2-Dichloroethane	ND	0.2
Trichloroethene	13	0.5
1,2-Dichloropropane	ND	1.0
Bromodichloromethane	ND	0.5
2-Chloroethylvinyl ether	ND	0.5
t-1,3-Dichloropropene	ND	1.0
Toluene	ND	0.2
c-1,3-Dichloropropene	ND	1.0
1,1,2-Trichloroethane	ND	0.8
Tetrachloroethene	ND	0.5
Dibromochloromethane	ND	1.0
Chlorobenzene	ND	0.2
Ethylbenzene	ND	0.2
m+p-Xylene	ND	0.2
o-Xylene	ND	0.2
Bromoform	ND	0.9
1,1,2,2-Tetrachloroethane	ND	0.7
1,3-Dichlorobenzene	ND	0.4
1,4-Dichlorobenzene	ND	0.4
1,2-Dichlorobenzene	ND	0.4

Claudia R. Donase
Analyst: Claudia R. Donase

Sample description - ANCO-2 Monitoring Well

Sample ID = 91-09-97-2
Parameter: Purgeables(601/02) Date analyzed: September 24, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l	Detection Limit ug/l
Dichlorodifluoromethane	ND	1.0
Chloromethane	ND	2.0
Vinyl chloride	ND	2.0
Chloroethane	ND	2.0
Bromoethane	ND	1.5
1,1-Dichloroethene	ND	0.4
Methylene chloride	ND	2.0
t-1,2-Dichloroethene	ND	0.2
1,1-Dichloroethane	ND	0.3
c-1,2-Dichloroethene	ND	0.2
Chloroform	ND	1.0
1,1,1-Trichloroethane	3.1	0.2
Carbon tetrachloride	ND	0.2
Benzene	ND	0.4
1,2-Dichloroethane	ND	0.2
Trichloroethene	8.5	0.5
1,2-Dichloropropane	ND	1.0
Bromodichloromethane	ND	0.5
2-Chloroethylvinyl ether	ND	0.5
t-1,3-Dichloropropene	ND	1.0
Toluene	ND	0.2
c-1,3-Dichloropropene	ND	1.0
1,1,2-Trichloroethane	1.1	0.8
Tetrachloroethene	ND	0.5
Dibromochloromethane	ND	1.0
Chlorobenzene	ND	0.2
Ethylbenzene	ND	0.2
m+p-Xylene	ND	0.2
o-Xylene	ND	0.2
Bromoform	ND	0.9
1,1,2,2-Tetrachloroethane	ND	0.7
1,3-Dichlorobenzene	ND	0.4
1,4-Dichlorobenzene	ND	0.4
1,2-Dichlorobenzene	ND	0.4

Claudia R. Donase

Analyst: Claudia R. Donase

DIHYDRO ANALYTICAL SERVICES

Sample description - ANCO-3 Monitoring Well

Sample ID = 91-09-97-3
Parameter: Purgeables(601/02) Date analyzed: September 24, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l	Detection Limit ug/l
Dichlorodifluoromethane	ND	1.0
Chloromethane	ND	2.0
Vinyl chloride	ND	2.0
Chloroethane	ND	2.0
Bromoethane	ND	1.5
1,1-Dichloroethene	ND	0.4
Methylene chloride	ND	2.0
t-1,2-Dichloroethene	ND	0.2
1,1-Dichloroethane	ND	0.3
c-1,2-Dichloroethene	ND	0.2
Chloroform	ND	1.0
1,1,1-Trichloroethane	ND	0.2
Carbon tetrachloride	ND	0.2
Benzene	ND	0.4
1,2-Dichloroethane	ND	0.2
Trichloroethene	64	0.5
1,2-Dichloropropane	ND	1.0
Bromodichloromethane	ND	0.5
2-Chloroethylvinyl ether	ND	0.5
t-1,3-Dichloropropene	ND	1.0
Toluene	ND	0.2
c-1,3-Dichloropropene	ND	1.0
1,1,2-Trichloroethane	ND	0.8
Tetrachloroethene	ND	0.5
Dibromochloromethane	ND	1.0
Chlorobenzene	ND	0.2
Ethylbenzene	ND	0.2
m+p-Xylene	ND	0.2
o-Xylene	ND	0.2
Bromoform	ND	0.9
1,1,2,2-Tetrachloroethane	ND	0.7
1,3-Dichlorobenzene	ND	0.4
1,4-Dichlorobenzene	ND	0.4
1,2-Dichlorobenzene	ND	0.4

Claudia R. Donase

Analyst: Claudia R. Donase

Sample description - ANCO-4 Monitoring Well

Sample ID = 91-09-97-4
Parameter: Purgeables(601/02) Date analyzed: September 24, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l	Detection Limit ug/l
Dichlorodifluoromethane	ND	1.0
Chloromethane	ND	2.0
Vinyl chloride	ND	2.0
Chloroethane	ND	2.0
Bromoethane	ND	1.5
1,1-Dichloroethene	ND	0.4
Methylene chloride	ND	2.0
t-1,2-Dichloroethene	ND	0.2
1,1-Dichloroethane	ND	0.3
c-1,2-Dichloroethene	ND	0.2
Chloroform	ND	1.0
1,1,1-Trichloroethane	ND	0.2
Carbon tetrachloride	ND	0.2
Benzene	ND	0.4
1,2-Dichloroethane	ND	0.2
Trichloroethene	20	0.5
1,2-Dichloropropane	ND	1.0
Bromodichloromethane	ND	0.5
2-Chloroethylvinyl ether	ND	0.5
t-1,3-Dichloropropene	ND	1.0
Toluene	ND	0.2
c-1,3-Dichloropropene	ND	1.0
1,1,2-Trichloroethane	1.2	0.8
Tetrachloroethene	ND	0.5
Dibromochloromethane	ND	1.0
Chlorobenzene	ND	0.2
Ethylbenzene	ND	0.2
m+p-Xylene	ND	0.2
o-Xylene	ND	0.2
Bromoform	ND	0.9
1,1,2,2-Tetrachloroethane	ND	0.7
1,3-Dichlorobenzene	ND	0.4
1,4-Dichlorobenzene	ND	0.4
1,2-Dichlorobenzene	ND	0.4

Claudia R. Donase

Analyst: Claudia R. Donase

Environmental Health Laboratories

110 S. Hill Street
South Bend, IN 46617
(219) 233-4777
(219) 233-3272
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LABORATORY REPORT

Client: Industrial Safety & Environmental Services
Attn: Tris Gour
716 Lincolnway West
Osceola, IN 46561

Report#: 53250-53

Priority: Standard Written

Status: Final

Project/Site: Anco Products

Samples Submitted: Four groundwater samples

Copies to: None

Collected: 02-10-93 By: Client Received: 02-10-93

REPORT SUMMARY

Volatile Organic Chemicals: The volatile organic chemicals listed below were detected in the water sample submitted for analysis.

Site	Parameter	Results
MW-1	Trichloroethylene	38 µg/L
MW-2	1,1,1-Trichloroethane	3.1 µg/L
	Trichloroethylene	6.8 µg/L
MW-3	1,1,1-Trichloroethane	3.6 µg/L
	Trichloroethylene	14 µg/L
MW-4	Trichloroethylene	17 µg/L

Results of all associated quality control samples were within acceptance limits. No project specific quality control was requested.

This test covers chemical contamination arising from gasoline and other fuels, dry-cleaning and paint solvents, and many other industrial solvents.

Detailed quantitative results are presented on the following pages.

We appreciate the opportunity to provide you with this analysis. If you have any questions concerning this report, please do not hesitate to call us at (219) 233-4777.

REVIEWED BY: Paul Parrat DATE: 03-03-93

FINALIZED BY: Jeff Brown DATE: 03/03/93

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS–Groundwater

Site: MW-1 Lab #: 53250

Parameter	PQL		Results	
Benzene	0.5	<	0.5	µg/L
Bromobenzene	1.0	<	1.0	µg/L
Bromochloromethane	1.0	<	1.0	µg/L
Bromodichloromethane	0.5	<	0.5	µg/L
Bromoform	0.5	<	0.5	µg/L
Bromomethane	2.0	<	2.0	µg/L
n-Butylbenzene	1.0	<	1.0	µg/L
sec-Butylbenzene	1.0	<	1.0	µg/L
tert-Butylbenzene	1.0	<	1.0	µg/L
Carbon tetrachloride	0.5	<	0.5	µg/L
Chlorobenzene	1.0	<	1.0	µg/L
Chloroethane	2.0	<	2.0	µg/L
Chloroform	0.5	<	0.5	µg/L
Chloromethane	2.0	<	2.0	µg/L
1,2-Chlorotoluene	1.0	<	1.0	µg/L
1,4-Chlorotoluene	1.0	<	1.0	µg/L
Dibromochloromethane	0.5	<	0.5	µg/L
1,2-Dibromo-3-Chloropropane	1.0	<	1.0	µg/L
1,2-Dibromoethane(EDB)	1.0	<	1.0	µg/L
Dibromomethane	1.0	<	1.0	µg/L
1,2-Dichlorobenzene	1.0	<	1.0	µg/L
1,3-Dichlorobenzene	1.0	<	1.0	µg/L
1,4-Dichlorobenzene	0.5	<	0.5	µg/L
Dichlorodifluoromethane	1.0	<	1.0	µg/L
1,1-Dichloroethane	1.0	<	1.0	µg/L
1,2-Dichloroethane	0.5	<	0.5	µg/L
1,1-Dichloroethylene	0.5	<	0.5	µg/L
1,2-Dichloroethylene, cis	1.0	<	1.0	µg/L
1,2-Dichloroethylene, trans	1.0	<	1.0	µg/L
Dichloromethane	1.0	<	1.0	µg/L
1,2-Dichloropropane	1.0	<	1.0	µg/L
1,3-Dichloropropane	1.0	<	1.0	µg/L
2,2-Dichloropropane	1.0	<	1.0	µg/L
1,1-Dichloropropylene	1.0	<	1.0	µg/L
1,3-Dichloropropylene, cis	1.0	<	1.0	µg/L

Continued on the following page.

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS--Groundwater, continued

Site: MW-1 Lab #: 53250

Parameter	PQL		Results	
1,3-Dichloropropylene,trans	1.0	<	1.0	µg/L
Ethylbenzene	0.5	<	0.5	µg/L
Hexachlorobutadiene	1.0	<	1.0	µg/L
Isopropylbenzene	1.0	<	1.0	µg/L
1,4-Isopropyltoluene	1.0	<	1.0	µg/L
Napthalene	1.0	<	1.0	µg/L
n-Propylbenzene	1.0	<	1.0	µg/L
Styrene	1.0	<	1.0	µg/L
1,1,1,2-Tetrachloroethane	1.0	<	1.0	µg/L
1,1,2,2-Tetrachloroethane	1.0	<	1.0	µg/L
Tetrachloroethylene	1.0	<	1.0	µg/L
Toluene	1.0	<	1.0	µg/L
1,2,3-Trichlorobenzene	1.0	<	1.0	µg/L
1,2,4-Trichlorobenzene	1.0	<	1.0	µg/L
1,1,1-Trichloroethane	0.5	<	0.5	µg/L
1,1,2-Trichloroethane	1.0	<	1.0	µg/L
Trichloroethylene	0.5		38	µg/L
Trichlorofluoromethane	1.0	<	1.0	µg/L
1,2,3-Trichloropropane	1.0	<	1.0	µg/L
1,2,4-Trimethylbenzene	1.0	<	1.0	µg/L
1,3,5-Trimethylbenzene	1.0	<	1.0	µg/L
Vinyl chloride	0.5	<	0.5	µg/L
Total Xylenes	1.0	<	1.0	µg/L

If dilutions were required for quantitation of specific parameters, they are indicated by a (√) preceeding the result.

Surrogate Standards	Limits (%)	% Recovery Undil
Bromofluorobenzene	86-115	97
1,2-Dichloroethane-d4	76-114	94
Toluene - d8	88-110	97

Analyzed: 02-11-93 Analyst: ES Method: 8260

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS–Groundwater

Site: MW-2 Lab #: 53251

Parameter	PQL		Results	
Benzene	0.5	<	0.5	µg/L
Bromobenzene	1.0	<	1.0	µg/L
Bromochloromethane	1.0	<	1.0	µg/L
Bromodichloromethane	0.5	<	0.5	µg/L
Bromoform	0.5	<	0.5	µg/L
Bromomethane	2.0	<	2.0	µg/L
n-Butylbenzene	1.0	<	1.0	µg/L
sec-Butylbenzene	1.0	<	1.0	µg/L
tert-Butylbenzene	1.0	<	1.0	µg/L
Carbon tetrachloride	0.5	<	0.5	µg/L
Chlorobenzene	1.0	<	1.0	µg/L
Chloroethane	2.0	<	2.0	µg/L
Chloroform	0.5	<	0.5	µg/L
Chloromethane	2.0	<	2.0	µg/L
1,2-Chlorotoluene	1.0	<	1.0	µg/L
1,4-Chlorotoluene	1.0	<	1.0	µg/L
Dibromochloromethane	0.5	<	0.5	µg/L
1,2-Dibromo-3-Chloropropane	1.0	<	1.0	µg/L
1,2-Dibromoethane(EDB)	1.0	<	1.0	µg/L
Dibromomethane	1.0	<	1.0	µg/L
1,2-Dichlorobenzene	1.0	<	1.0	µg/L
1,3-Dichlorobenzene	1.0	<	1.0	µg/L
1,4-Dichlorobenzene	0.5	<	0.5	µg/L
Dichlorodifluoromethane	1.0	<	1.0	µg/L
1,1-Dichloroethane	1.0	<	1.0	µg/L
1,2-Dichloroethane	0.5	<	0.5	µg/L
1,1-Dichloroethylene	0.5	<	0.5	µg/L
1,2-Dichloroethylene, cis	1.0	<	1.0	µg/L
1,2-Dichloroethylene, trans	1.0	<	1.0	µg/L
Dichloromethane	1.0	<	1.0	µg/L
1,2-Dichloropropane	1.0	<	1.0	µg/L
1,3-Dichloropropane	1.0	<	1.0	µg/L
2,2-Dichloropropane	1.0	<	1.0	µg/L
1,1-Dichloropropylene	1.0	<	1.0	µg/L
1,3-Dichloropropylene, cis	1.0	<	1.0	µg/L

Continued on the following page.

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS–Groundwater, continued

Site: MW-2 Lab #: 53251

Parameter	PQL	Results		
1,3-Dichloropropylene,trans	1.0	<	1.0	µg/L
Ethylbenzene	0.5	<	0.5	µg/L
Hexachlorobutadiene	1.0	<	1.0	µg/L
Isopropylbenzene	1.0	<	1.0	µg/L
1,4-Isopropyltoluene	1.0	<	1.0	µg/L
Napthalene	1.0	<	1.0	µg/L
n-Propylbenzene	1.0	<	1.0	µg/L
Styrene	1.0	<	1.0	µg/L
1,1,1,2-Tetrachloroethane	1.0	<	1.0	µg/L
1,1,2,2-Tetrachloroethane	1.0	<	1.0	µg/L
Tetrachloroethylene	1.0	<	1.0	µg/L
Toluene	1.0	<	1.0	µg/L
1,2,3-Trichlorobenzene	1.0	<	1.0	µg/L
1,2,4-Trichlorobenzene	1.0	<	1.0	µg/L
1,1,1-Trichloroethane	0.5		**3.1**	**µg/L**
1,1,2-Trichloroethane	1.0	<	1.0	µg/L
Trichloroethylene	0.5		**6.8**	**µg/L**
Trichlorofluoromethane	1.0	<	1.0	µg/L
1,2,3-Trichloropropane	1.0	<	1.0	µg/L
1,2,4-Trimethylbenzene	1.0	<	1.0	µg/L
1,3,5-Trimethylbenzene	1.0	<	1.0	µg/L
Vinyl chloride	0.5	<	0.5	µg/L
Total Xylenes	1.0	<	1.0	µg/L

If dilutions were required for quantitation of specific parameters, they are indicated by a (√) preceeding the result.

Surrogate Standards	Limits (%)	% Recovery Undil
Bromofluorobenzene	86-115	102
1,2-Dichloroethane-d4	76-114	89
Toluene - d8	88-110	96

Analyzed: 02-11-93 Analyst: ES Method: 8260

Client: Industrial Safety & Environmental Services Report#: 53250–53

VOLATILE ORGANIC CHEMICALS–Groundwater

Site: MW-3 Lab #: 53252

Parameter	PQL		Results	
Benzene	0.5	<	0.5	µg/L
Bromobenzene	1.0	<	1.0	µg/L
Bromochloromethane	1.0	<	1.0	µg/L
Bromodichloromethane	0.5	<	0.5	µg/L
Bromoform	0.5	<	0.5	µg/L
Bromomethane	2.0	<	2.0	µg/L
n-Butylbenzene	1.0	<	1.0	µg/L
sec-Butylbenzene	1.0	<	1.0	µg/L
tert-Butylbenzene	1.0	<	1.0	µg/L
Carbon tetrachloride	0.5	<	0.5	µg/L
Chlorobenzene	1.0	<	1.0	µg/L
Chloroethane	2.0	<	2.0	µg/L
Chloroform	0.5	<	0.5	µg/L
Chloromethane	2.0	<	2.0	µg/L
1,2-Chlorotoluene	1.0	<	1.0	µg/L
1,4-Chlorotoluene	1.0	<	1.0	µg/L
Dibromochloromethane	0.5	<	0.5	µg/L
1,2-Dibromo-3-Chloropropane	1.0	<	1.0	µg/L
1,2-Dibromoethane(EDB)	1.0	<	1.0	µg/L
Dibromomethane	1.0	<	1.0	µg/L
1,2-Dichlorobenzene	1.0	<	1.0	µg/L
1,3-Dichlorobenzene	1.0	<	1.0	µg/L
1,4-Dichlorobenzene	0.5	<	0.5	µg/L
Dichlorodifluoromethane	1.0	<	1.0	µg/L
1,1-Dichloroethane	1.0	<	1.0	µg/L
1,2-Dichloroethane	0.5	<	0.5	µg/L
1,1-Dichloroethylene	0.5	<	0.5	µg/L
1,2-Dichloroethylene, cis	1.0	<	1.0	µg/L
1,2-Dichloroethylene, trans	1.0	<	1.0	µg/L
Dichloromethane	1.0	<	1.0	µg/L
1,2-Dichloropropane	1.0	<	1.0	µg/L
1,3-Dichloropropane	1.0	<	1.0	µg/L
2,2-Dichloropropane	1.0	<	1.0	µg/L
1,1-Dichloropropylene	1.0	<	1.0	µg/L
1,3-Dichloropropylene, cis	1.0	<	1.0	µg/L

Continued on the following page.

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS–Groundwater, continued

Site: MW-3 Lab #: 53252

Parameter	PQL		Results	
1,3-Dichloropropylene,trans	1.0	<	1.0	µg/L
Ethylbenzene	0.5	<	0.5	µg/L
Hexachlorobutadiene	1.0	<	1.0	µg/L
Isopropylbenzene	1.0	<	1.0	µg/L
1,4-Isopropyltoluene	1.0	<	1.0	µg/L
Napthalene	1.0	<	1.0	µg/L
n-Propylbenzene	1.0	<	1.0	µg/L
Styrene	1.0	<	1.0	µg/L
1,1,1,2-Tetrachloroethane	1.0	<	1.0	µg/L
1,1,2,2-Tetrachloroethane	1.0	<	1.0	µg/L
Tetrachloroethylene	1.0	<	1.0	µg/L
Toluene	1.0	<	1.0	µg/L
1,2,3-Trichlorobenzene	1.0	<	1.0	µg/L
1,2,4-Trichlorobenzene	1.0	<	1.0	µg/L
1,1,1-Trichloroethane	0.5		**3.6**	**µg/L**
1,1,2-Trichloroethane	1.0	<	1.0	µg/L
Trichloroethylene	0.5		**14**	**µg/L**
Trichlorofluoromethane	1.0	<	1.0	µg/L
1,2,3-Trichloropropane	1.0	<	1.0	µg/L
1,2,4-Trimethylbenzene	1.0	<	1.0	µg/L
1,3,5-Trimethylbenzene	1.0	<	1.0	µg/L
Vinyl chloride	0.5	<	0.5	µg/L
Total Xylenes	1.0	<	1.0	µg/L

If dilutions were required for quantitation of specific parameters, they are indicated by a (√) preceeding the result.

Surrogate Standards	Limits (%)	% Recovery Undil
Bromofluorobenzene	86-115	107
1,2-Dichloroethane-d4	76-114	88
Toluene - d8	88-110	100

Analyzed: 02-11-93 Analyst: ES Method: 8260

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS--Groundwater

Site: MW-4 Lab #: 53253

Parameter	PQL	Results		
Benzene	0.5	<	0.5	µg/L
Bromobenzene	1.0	<	1.0	µg/L
Bromochloromethane	1.0	<	1.0	µg/L
Bromodichloromethane	0.5	<	0.5	µg/L
Bromoform	0.5	<	0.5	µg/L
Bromomethane	2.0	<	2.0	µg/L
n-Butylbenzene	1.0	<	1.0	µg/L
sec-Butylbenzene	1.0	<	1.0	µg/L
tert-Butylbenzene	1.0	<	1.0	µg/L
Carbon tetrachloride	0.5	<	0.5	µg/L
Chlorobenzene	1.0	<	1.0	µg/L
Chloroethane	2.0	<	2.0	µg/L
Chloroform	0.5	<	0.5	µg/L
Chloromethane	2.0	<	2.0	µg/L
1,2-Chlorotoluene	1.0	<	1.0	µg/L
1,4-Chlorotoluene	1.0	<	1.0	µg/L
Dibromochloromethane	0.5	<	0.5	µg/L
1,2-Dibromo-3-Chloropropane	1.0	<	1.0	µg/L
1,2-Dibromoethane(EDB)	1.0	<	1.0	µg/L
Dibromomethane	1.0	<	1.0	µg/L
1,2-Dichlorobenzene	1.0	<	1.0	µg/L
1,3-Dichlorobenzene	1.0	<	1.0	µg/L
1,4-Dichlorobenzene	0.5	<	0.5	µg/L
Dichlorodifluoromethane	1.0	<	1.0	µg/L
1,1-Dichloroethane	1.0	<	1.0	µg/L
1,2-Dichloroethane	0.5	<	0.5	µg/L
1,1-Dichloroethylene	0.5	<	0.5	µg/L
1,2-Dichloroethylene, cis	1.0	<	1.0	µg/L
1,2-Dichloroethylene, trans	1.0	<	1.0	µg/L
Dichloromethane	1.0	<	1.0	µg/L
1,2-Dichloropropane	1.0	<	1.0	µg/L
1,3-Dichloropropane	1.0	<	1.0	µg/L
2,2-Dichloropropane	1.0	<	1.0	µg/L
1,1-Dichloropropylene	1.0	<	1.0	µg/L
1,3-Dichloropropylene, cis	1.0	<	1.0	µg/L

Continued on the following page.

Client: Industrial Safety & Environmental Services Report#: 53250-53

VOLATILE ORGANIC CHEMICALS--Groundwater, continued

Site: MW-4 Lab #: 53253

Parameter	PQL	Results		
1,3-Dichloropropylene,trans	1.0	<	1.0	µg/L
Ethylbenzene	0.5	<	0.5	µg/L
Hexachlorobutadiene	1.0	<	1.0	µg/L
Isopropylbenzene	1.0	<	1.0	µg/L
1,4-Isopropyltoluene	1.0	<	1.0	µg/L
Napthalene	1.0	<	1.0	µg/L
n-Propylbenzene	1.0	<	1.0	µg/L
Styrene	1.0	<	1.0	µg/L
1,1,1,2-Tetrachloroethane	1.0	<	1.0	µg/L
1,1,2,2-Tetrachloroethane	1.0	<	1.0	µg/L
Tetrachloroethylene	1.0	<	1.0	µg/L
Toluene	1.0	<	1.0	µg/L
1,2,3-Trichlorobenzene	1.0	<	1.0	µg/L
1,2,4-Trichlorobenzene	1.0	<	1.0	µg/L
1,1,1-Trichloroethane	0.5	<	0.5	µg/L
1,1,2-Trichloroethane	1.0	<	1.0	µg/L
Trichloroethylene	0.5		**17**	**µg/L**
Trichlorofluoromethane	1.0	<	1.0	µg/L
1,2,3-Trichloropropane	1.0	<	1.0	µg/L
1,2,4-Trimethylbenzene	1.0	<	1.0	µg/L
1,3,5-Trimethylbenzene	1.0	<	1.0	µg/L
Vinyl chloride	0.5	<	0.5	µg/L
Total Xylenes	1.0	<	1.0	µg/L

If dilutions were required for quantitation of specific parameters, they are indicated by a (√) preceeding the result.

Surrogate Standards	Limits (%)	% Recovery Undil
Bromofluorobenzene	86-115	104
1,2-Dichloroethane-d4	76-114	83
Toluene - d8	88-110	86

Analyzed: 02-11-93 Analyst: ES Method: 8260

Client: Industrial Safety & Environmental Services Report#: 53250-53

REFERENCES AND DEFINITIONS OF TERMS

Volatile Organic Chemical (VOC) Groundwater Analysis
Analytical Technique: Purge & Trap/GC/MS
Reference: EPA Test Methods for Evaluating Solid Waste
SW-846, Third Edition, November 1986

Volatile Organic Chemicals (VOC's) are a group of natural and synthetic organic chemicals characterized by their volatility (ability to evaporate). The volatile chemicals included in this report have been selected by the EPA to be monitored both because of their suspected toxicity and because of their widespread use in industry. Many are used in the production of plastics, clothing and other common items found in most industries.

Practical Quantitation Limits (PQL's) represent the lower limit at which the compounds of interest can be accurately measured, at a 95% confidence level, and reported for a sample exhibiting minimal chemical background interference under the conditions employed in the analytical procedure. PQL's are by definition a function of the instrument performance for an ideal sample and thus are not adjusted for sample dilutions used to calculate results.

Results: Values presented in the result column represent the lowest reportable value for a parameter after correcting for all sample dilutions.

1µg/L = 1 microgram per liter (ug/L) = 1 part per billion

< = "less than". This number is the lowest reportable value by the procedure used for analysis.

John C. Wallace, Inc.

Environmental Consultant
1215 Whitehall Drive
South Bend, Indiana 46615
Telephone 219-233-7141

August 21, 1991

Attn. Mr. Howard Tomlinson
Anco Products
2500 S. 17th St.
Elkhart, IN

RE: Assessment for Risk Evaluation.
Gemeinhardt, Bock, and Lusher Sites

Dear Howard:

I am pleased to submit three (3) copies of this report for an assessment for risk evaluation at Anco Products, 2500 S. Seventeenth Street, Elkhart, Indiana, hereinafter referred to as **project site.**

Background.

The original intent of the site assessment conducted at the project site was to determine the impact, if any, that activities conducted during manufacturing processes, past and present, have had on the environment. This assessment was started by CHES Consultants and documents were released May 12, 1989; Preliminary Assessment, June 20, 1989; sample results and meeting with NBD representative.

During the time of the original assessment two underground storage tanks (USTs) were discovered. It was also discovered that a significant build up of waste material from the manufacturing processes, was known to exist at the base of the dust collection unit. Actions were taken to provide temporary closure of USTs till a formal site assessment for UST closure could be achieved. A system of monitor wells were installed as part of the assessment, to understand the subsurface condition of the project site related to The USTs and the dust collection unit.

Monitor wells were installed in a manner consistent with the inferred groundwater flow, depicted in the Indiana Department of Natural Resource (IDNR) document; St. Joseph River Basin. Water Resource Assessment 87-1. Parameters for analysis were decided upon as related to the products stored in the USTs and the material related to the dust collection unit (acetone, toluene, formaldehyde, phenols).

Samples were taken from the monitor wells in December of 1990 and again in January of 1991. The intent of the samples taken was to provide assessment data for the closure of the USTs. For the purpose of closure, it was only necessary to be concerned with the contents of the USTs (acetone and toluene). EPA Method 601/02 were the parameters requested for the analysis. This method is considered a solvent scan.

It was on receipt of the results for the analysis of the December samples that we learned of trichloroethylene (TCE) being present in the groundwater. Our findings were then confirmed through a second round of sampling, January 24, 1991. The analytical results were received February 1, 1991.

At that time it was decided by Anco Products and John C. Wallace, Inc., that closure of the USTs was of major concern. Dyhydro Analytical Services of Wayne, Michigan, who has provided analytical services throughout the project, agreed to enclose analysis data for compounds; acetone and toluene under a separate letter to be included with closure information, submitted to the Indiana Department of Environmental Management. Closure was achieved through submission of the February 20, 1991 document submitted by John C. Wallace, Inc. and Anco Products.

The findings hereunder are limited to findings of fact and not as to the applicability of the statute for the particular matter, for all such legal opinions advise of legal counsel should be obtained. John C. Wallace, Inc. approaches the legal issues from the point of view of the informed layman.

<u>Gemeinhardt, Bock Industries and Lusher St.</u>

Companies; Gemeinhardt and Bock Industries and the Lusher Street Groundwater Contamination Site, have long been on the state list of Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) properties for Elkhart County. The contamination associated with these sites is TCE. What makes the information for these sites even more confusing, is that the Gemeinhardt property is the only site with a known source for the TCE contamination. There has been much speculation that the origin for the contamination in all three sites has originated at the Gemeinhardt Site.

Gemeinhardt, has in the past, used an injection well for much of the water type waste disposal including degreasing type solvents; TCE. Gemeinhardt took the injection well out of service prior to 1984. Hazardous waste was banned in December of 1984, in a system like the one for the Gemeinhardt site (40 Code of Federal Regulations 144). However, considerable contamination was thought to of originated from the usage. It was also learned, by the IDEM, that the injection well was continually used after it had been thought to be out of service.

In April of 1983 a Consent Decree was issued for violations concerning a known contamination found at the Gemeinhardt location. The order was impart, to refund money to the state for water services provided to area residents and businesses, in the form of water main extension, water hook ups and bottled water for interim periods. The Decree also stated

that an investigation and remedial techniques were to be investigated and decided upon with cooperation with the state agency (IDEM).

In 1984 it was estimated that the contamination extended north, northwest for a distance of one mile. Which included the Bock Industries location. Poor housekeeping practices were observed at the Bock Industries site, and it was also found that TCE was used at this location.

In 1987, Honey RV, Hively Street, contamination was discovered at levels for TCE; 10 ppb. By this time ENSR, a firm from Boston Massachusetts, had begun work as the environmental engineer for Gemeinhardt. As many as sixteen nested monitor wells were placed at various locations throughout the area. Groundwater modeling was completed using these well locations. Attached you will find a map depicting the model of the presumed plume released in a document from ENSR, 1988.

Also in 1987, the Elkhart County Health Department began work on the Lusher Street Project. Again TCE was the main contaminant found. A sixteen block radius was established using Leininger Street, SR 19, 18th Street and Lusher Street as boundaries. It was established that 34% of the wells sampled were contaminated by TCE. The contaminated area included a portion of 17th Street, in that a residential well at 2205 17th was found to have TCE at levels above maximum contamination level (MCL) for drinking water. Again, it appears that the immediate action provided by the state and county was to provide hook up and access to public water. A source for the contamination was never established.

Department of Environmental Management and the Elkhart County Health Department. The amount of liability for costs is a legal question, and advise of legal counsel should be obtained. The amount of contamination in the area, and number of possible sources, as outlined above, make it increasingly difficult to establish an exact source.

Recommendations.

Continual sampling of the monitor wells has been agreed on previously, and may be appropriate at present. There are several approaches for more definitive answers for establishing the source of contamination. They may not be cost effective or even conclusive, but deserve consideration.

1. The information available at the state offices concerning Gemeinhardt and Bock has been updated since the report released in 1988. This information is available for review at the Indianapolis location for the IDEM. This may be done at a minimal cost.
2. The monitor wells in existence at Anco Products are singularly set for the depth of groundwater. TCE is not a floater. A nest of wells at different depths, should give a more accurate profile as to the extent of contamination.
3. A survey of the monitor wells would give an accurate depiction as to the slope and direction of groundwater flow.

Thank you for allowing us to provide for your environmental concerns. Should there be any questions regarding the information contained herein, or if a cost estimate is desired for the above recommendations, please do not hesitate to contact my office at your earliest convenience.

Very truly yours,

John C. Wallace, Inc.

John C. Wallace

Information Sources

Department of Environmental Management, Office of Solid Waste Management and Hazardous Waste Management, Site Investigation Section, CERCLIS Sites.

Indiana Department of Environmental Management, 5500 Bradbury Street, Indianapolis, Indiana (spill files).

Indiana Department of Environmental Management, Underground Storage Tank Program, 2321 Executive Drive, Indianapolis, Indiana.

Environmental Protection Agency, National Priority List, BNA Publications, National Contingency Section.

Guidance on landowner Liability under Section 107(a)(1) of CERCLA, and Settlements with Prospective Purchasers of Contaminated Property: MEMORANDUM; June 6, 1989; USEPA.

FOCUS "The Bulletin of Environmental Risk Evaluation and Management" Published for Hazardous Materials Institute, Inc., Columbus Ohio.

Hydrologic and Chemical Evaluation of the Groundwater Resources of Northern Elkhart, Investigations 81-53; October 1981.

Anco Assessment Documents, CHES Consultants; released May 12, 1989; Preliminary Assessment, June 20, 1989; sample results, and John C. Wallace, Inc.; released February 20 1990; UST Closure, July 19, 1991; Sharing of Information Notice, Mr. Harry Ackerman, Indiana Department of Environmental Mangement.

MAPS:

United States Department of the Interior Geological Survey, Eastern Elkhart Quadrangle (Topographical).

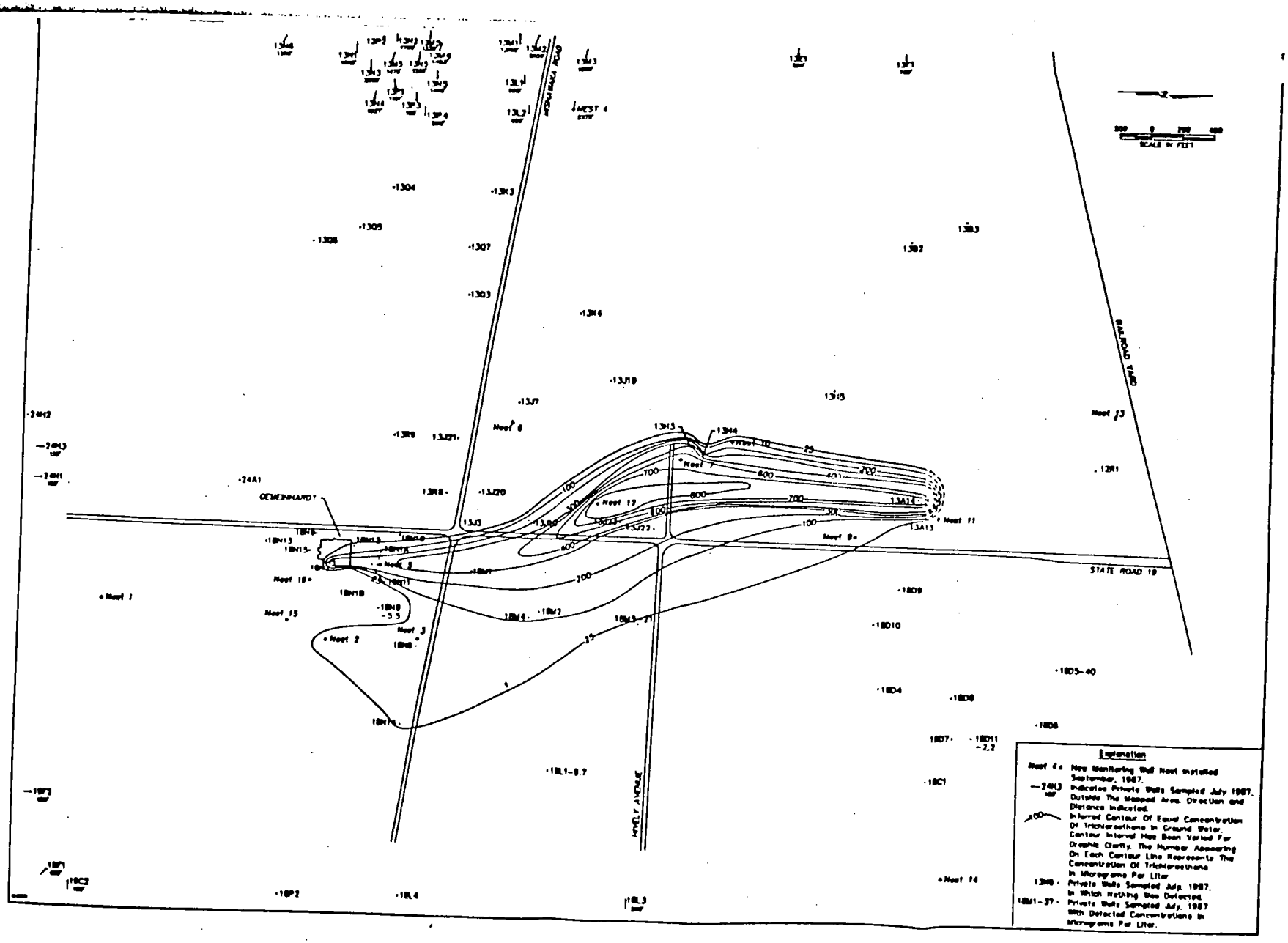
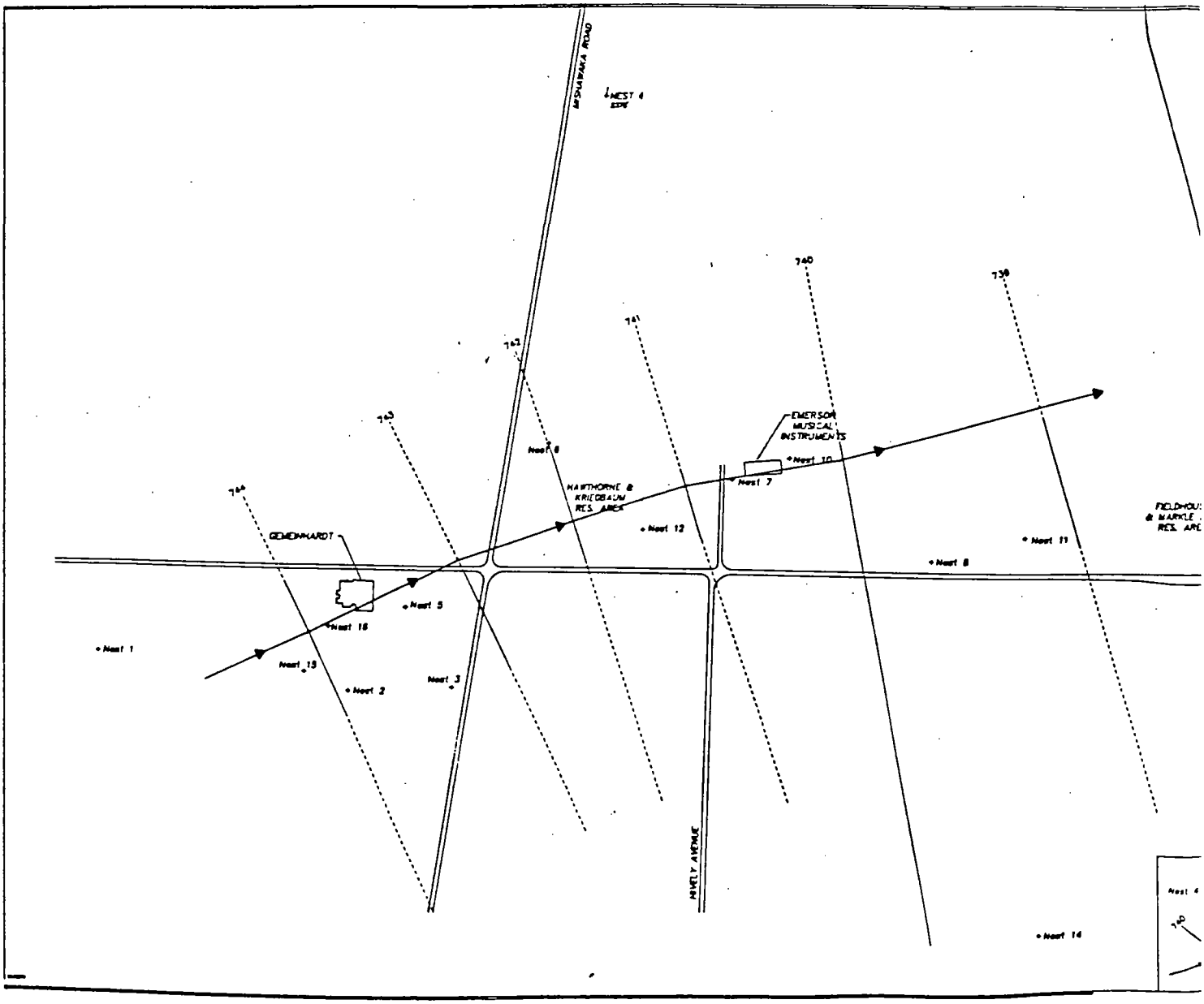


Figure 4-14

Areal Distribution of Trichloroethene from February, 1988 Sampling of New Monitoring Well


MESHABAKA ROAD
WEST 4
EDW
740
739
741
742
743
744
EMERSON
MUSICAL
INSTRUMENTS
Nest 10
Nest 7
Nest 6
HAWTHORNE &
KRIEGBAUM
RES. AREA
Nest 12
GEMEINHARDT
Nest 5
Nest 16
Nest 1
Nest 15
Nest 2
Nest 3
Nest 11
Nest 8
FIELDHOU
& MARKLE
RES. ARE
MIVELY AVENUE
Nest 14
Nest 4

John C. Wallace, Inc.

Environmental Consultant
1215 Whitehall Drive
South Bend, Indiana 46615
Telephone 219-233-7141

July 24, 1991

Attn. Mr. Harry Ackerson
IDEM
Site Investigation Section
105 S. Meridian
Indianapolis, IN 46206-6013

RE: Information Sharing
CERCLIS Sites:
Gemeinhardt and Bock Industries
Elkhart County
Elkhart, Indiana

Dear Mr. Ackerson:

As stated during our phone conversation, July 17, 1991, certain information is available from four monitor wells at a property within approximately 1/4 mile of the area of the above mentioned CERCLIS Sites.

Anco Products, Inc., 2500 S. Seventeenth St., Elkhart, Indiana, is in the business of manufacturing insulated ducting. As part of a business program, unrelated to the concerns addressed in this writing, an environmental property assessment was conducted. Part of the assessment called for the installation of four (4) monitor wells. The monitor wells were placed in manner that would allow a subsurface investigation of the groundwater as it moved on-site (upgradient), and the impact, if any, that the manufacturing processes conducted at Anco Products would have.

In addition to sampling and analysis completed for compounds related to the manufacturing processes conducted at Anco Products, a solvent scan or method 601/02, were parameters also included in the analysis, in part, to determine the impact from adjacent and area manufacturing businesses. Anco Products, became aware of potential contamination during previous investigations of the CERCLIS Sites mentioned above and the Lusher Street investigation. Anco Products, Incorporated has never used Trichloroethylene (TCE) in their manufacturing processes, and asks that you assist them in determining the source and /or the responsible party.

You stated during our phone conversation that it is not uncommon to find TCE in the groundwater in the area. Anco Products, however, is quite concerned as to the impact that local businesses have had on the groundwater, and hopes that the sharing of this information will assist the IDEM in their investigation.

Enclosed you will find; well logs, results of sampling and analysis, and a site map (sketch) depicting monitor well placement.

Thank you for your time and consideration in this matter. If there are any questions regarding the information contained herein, please do not hesitate to contact my office at; 219, 233-7141.

Very truly yours,

John C. Wallace, Inc.

John C. Wallace

Enclosures.

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

EXHIBIT C
2410 Weaver Rd.
Niles, MI 49120
616-684-6269

BORING NO. Well #1 SHEET 1 OF 5

PROJECT ANCO LOCATION Elkhart Ind

JOB NO. Anco DATE COMPLETED June 7 99 WEATHER Sunny Hot

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 14.3 AFTER 24 HRS. _____

FIELD BORING LOG

DEPTH (From - To)	METHOD	SAMPLE NO.	RECOVERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	N	DESCRIPTION, REMARKS, ETC.
0.0-0.1	SS	1	18"	0.0-1.5	7	7	8		Sandy Top Soil
0.1-1.0	"	2	"	4.5-6.0	2	2	2		Med Dark Brn fine-med Sand
1.0-4.8	"	3	"	9.0-10.5	4	6	10		Med Brn fine-med Sand -
4.8-7.2	"	4	"	13.5-15.0	3	4	5		Loose Brn fine-med Sand Trace
7.2-14.0									Med-Brn-med-coarse Sand - Gravel
14.0-15.0									wet Loose Brn-fine-med-Sand fine Gra
				Augered To 33.0					
				Set well 19.0 to 28.0. Screen					
									EOB 28.0

RIG NO. CME 75 LOGGED BY Brian Martindale

EXHIBIT C

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

2410 Weaver Rd.
Niles, MI 49120
616-684-6269

BORING NO. Well #2 SHEET 2 OF 4

PROJECT ANLO LOCATION ELKHART - Ind

JOB NO. ANLO DATE COMPLETED 7 99 WEATHER Sunny HOT

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 14.5 15.3 In well AFTER 24 HRS. _____

FIELD BORING LOG

DEPTH (From - To)	METHOD	SAMPLE NO.	RECOVERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	4	DESCRIPTION, REMARKS, ETC.
0.0 - 0.4	SS	1	18	0.0 - 1.5	1	3	4		Sandy Top Soil
0.4 - 7.6	"	2	"	4.5 - 6.0	2	3	3		Loose Brn fine-med Sand Trace gravel
7.6 - 12.0	"	3	"	9.0 - 10.5	3	4	5		Loose Brn. med - coarse Sand fine gravel
12.0 - 14.4	"	4	"	13.5 - 15.0	3	5	5		Med Brn med - coarse Sand. gravel
14.4 - 15.0									wet, " " " " "
				Augered to 23.0					
				Set Screen from 18.0 - 23.0					

FIG NO. Cme 75 LOGGED BY Dan Matisse

EXHIBIT C

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

2410 Weaver Rd.
Niles, MI 49120
616-684-8269

BORING NO. Well #3 SHEET 3 OF 4

PROJECT ANCO LOCATION ELKHART IND

JOB NO. ANCO DATE COMPLETED June 7 85 WEATHER Sunny Hot

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 14.0 AFTER 24 HRS. _____

FIELD BORING LOG

DEPTH (From - To)	METHOD	SAMPLE NO.	RECOVERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	N	DESCRIPTION, REMARKS, ETC.
0.0 - 0.7	SS	1	18"	0.0-1.5	2	2	2		Sandy Top Soil
0.7 - 3.4	"	2	"	4.5-6.0	2	2	3		Loose Dark Brn Fine-med Sand
3.4 - 7.9	"	3	"	9.0-10.5	3	4	5		Loose Brn Fine-med Sand
7.9 - 14.0	"	4	"	13.5-15.0	4	4	5		Loose Lht Brn Fine Sand
14.0 - 15.0									Loose Brn Med-Coarse Sand-Gravel
				Reamed	To	23.0			EOB 23.0
				Set wen	Screen			18.0	-23.0

RIG NO. [illegible] LOGGED BY [illegible]

EXHIBIT C

1103 South Bend Avenue
South Bend, IN 46617
219-233-6820

COOK DRILLING COMPANY

2410 Weaver Rd.
Niles, MI 49120
616-684-6269

BORING NO. Well #4 SHEET 4 OF 4

PROJECT ANCO LOCATION Elkhart Ind

JOB NO. ANCO DATE COMPLETED June 7 89 WEATHER Sunny Hot!

SURFACE ELEVATION _____ WATER DEPTH @ COMPLETION 13.8. AFTER 24 HRS. _____

FIELD BORING LOG

DEPTH (From - To)	METHOD	SAMPLE NO.	RECOVERY	SAMPLE INTERVAL	PENETRATION IN BLOW COUNT 1	2	3	4	DESCRIPTION, REMARKS, ETC.
0.0 - 0.2	SS	1	18"	0.0-1.5	Auger	5	6		Asphalt
0.2 - 3.2	"	2	"	4.5-6.0	4	4	5		Med Brn fine - mid - Sand To gravel Tr Silt
3.2 - 4.7	"	3	"	9.0-10.5	4	6	7		Dk Brn med. coarse Sand - Tr Silt. gr
4.7 - 10.4	"	4	"	13.5-15.0	3	7	5		Loose Brn med - coarse Sand - gravel
10.4 - 13.8									Med Brn fine Sand
13.8 - 15.0									wet med Brn - med - coarse Sand gravel
				Augered down to 23.0' EOB 23.0'					
				Set well Screen					18.0' To 23.0'

RIG NO. Crc 75 LOGGED BY Alan Martindale

Sample description - Anco 1
Anco tank assessment

Sample ID = 90-12-80-1
Parameter: Purgeables(601/02)
Matrix: Water

Date analyzed: December 17, 1990
Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	2.6	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	8.9	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco 2
Anco tank assessment

Sample ID = 90-12-80-2
Parameter: Purgeables(601/02)
Matrix: Water

Date analyzed: December 17, 1990
Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	4.7	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	6.9	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco 3
Anco tank assessment

Sample ID = 90-12-80-3
Parameter: Purgeables(601/02)
Matrix: Water

Date analyzed: December 17, 1990
Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l	
Dichlorodifluoromethane		ND	<	1.0
Chloromethane		ND	<	2.0
Vinyl chloride		ND	<	2.0
Chloroethane		ND	<	2.0
Bromoethane		ND	<	1.5
1,1-Dichloroethene		ND	<	0.4
Methylene chloride		ND	<	2.0
t-1,2-Dichloroethene		ND	<	0.2
1,1-Dichloroethane		ND	<	0.3
c-1,2-Dichloroethene		ND	<	0.2
Chloroform		ND	<	1.0
1,1,1-Trichloroethane		ND	<	0.2
Carbon tetrachloride		ND	<	0.2
Benzene		ND	<	0.4
1,2-Dichloroethane		ND	<	0.2
Trichloroethene	81		<	0.5
1,2-Dichloropropane		ND	<	1.0
Bromodichloromethane		ND	<	0.5
2-Chloroethylvinyl ether		ND	<	0.5
t-1,3-Dichloropropene		ND	<	1.0
Toluene		ND	<	0.2
c-1,3-Dichloropropene		ND	<	1.0
1,1,2-Trichloroethane		ND	<	1.0
Tetrachloroethene		ND	<	1.0
Dibromochloromethane		ND	<	1.0
Chlorobenzene		ND	<	0.2
Ethylbenzene		ND	<	0.2
m+p-Xylene		ND	<	0.2
o-Xylene		ND	<	0.2
Bromoform		ND	<	0.9
1,1,2,2-Tetrachloroethane		ND	<	0.7
1,3-Dichlorobenzene		ND	<	0.4
1,4-Dichlorobenzene		ND	<	0.4
1,2-Dichlorobenzene		ND	<	0.4

Analyst: R. S. Lynch

Sample description - Method standard
90-12-39/-43/-64/-80/-98

SAMPLE ID = MSpike
Parameter: PURGEABLES(601&2)
Date analyzed: 12-17-90
Matrix: Water
Analyst: rsl

Compound	Mean ug/l	Spike ug/l	True Spike ug/l	% Recovery
Methylene chloride	0.0	25.1	21.2	118.6
1,1-Dichloroethane	0.0	24.5	21.8	112.3
Chloroform	0.0	24.8	23.0	107.8
1,1,1-Trichloroethane	0.0	24.4	23.1	105.6
1,2-Dichloroethane	0.0	26.8	22.6	118.7
Trichloroethene	0.0	25.3	25.6	98.8
1,2-Dichloropropane	0.0	22.1	22.5	98.4
Toluene	0.0	23.2	21.0	110.7
1,1,2-Trichloroethane	0.0	24.3	24.4	99.6
Tetrachloroethene	0.0	30.9	32.2	96.0
Chlorobenzene	0.0	18.5	22.5	82.4
Ethylbenzene	0.0	20.7	22.1	93.5
m+p-Xylene	0.0	20.5	21.2	96.8
o-Xylene	0.0	19.4	22.4	86.8
1,1,2,2-Tetrachloroethane	0.0	19.8	21.8	90.8
1,3-Dichlorobenzene	0.0	18.3	22.4	81.9
1,4-Dichlorobenzene	0.0	28.5	27.3	104.3
1,2-Dichlorobenzene	0.0	21.3	23.1	92.2

Sample description - Anco-1A MW-1
Anco tank assessment

Sample ID = 91-01-148-1
Parameter: Purgeables(601/02) Date analyzed: January 25, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	4.8	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	16	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco-2A MW-2
Anco tank assessment

Sample ID = 91-01-148-2
Parameter: Purgeables(601/02) Date analyzed: January 25, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	6.0	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	9.1	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	1.1	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

Analyst: R. S. Lynch

Sample description - Anco-3A MW-3
Anco tank assessment

Sample ID = 91-01-148-3
Parameter: Purgeables(601/02) Date analyzed: January 25, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l
Dichlorodifluoromethane	ND	<	1.0
Chloromethane	ND	<	2.0
Vinyl chloride	ND	<	2.0
Chloroethane	ND	<	2.0
Bromoethane	ND	<	1.5
1,1-Dichloroethene	ND	<	0.4
Methylene chloride	ND	<	2.0
t-1,2-Dichloroethene	ND	<	0.2
1,1-Dichloroethane	ND	<	0.3
c-1,2-Dichloroethene	ND	<	0.2
Chloroform	ND	<	1.0
1,1,1-Trichloroethane	ND	<	0.2
Carbon tetrachloride	ND	<	0.2
Benzene	ND	<	0.4
1,2-Dichloroethane	ND	<	0.2
Trichloroethene	87	<	0.5
1,2-Dichloropropane	ND	<	1.0
Bromodichloromethane	ND	<	0.5
2-Chloroethylvinyl ether	ND	<	0.5
t-1,3-Dichloropropene	ND	<	1.0
Toluene	ND	<	0.2
c-1,3-Dichloropropene	ND	<	1.0
1,1,2-Trichloroethane	ND	<	1.0
Tetrachloroethene	ND	<	1.0
Dibromochloromethane	ND	<	1.0
Chlorobenzene	ND	<	0.2
Ethylbenzene	ND	<	0.2
m+p-Xylene	ND	<	0.2
o-Xylene	ND	<	0.2
Bromoform	ND	<	0.9
1,1,2,2-Tetrachloroethane	ND	<	0.7
1,3-Dichlorobenzene	ND	<	0.4
1,4-Dichlorobenzene	ND	<	0.4
1,2-Dichlorobenzene	ND	<	0.4

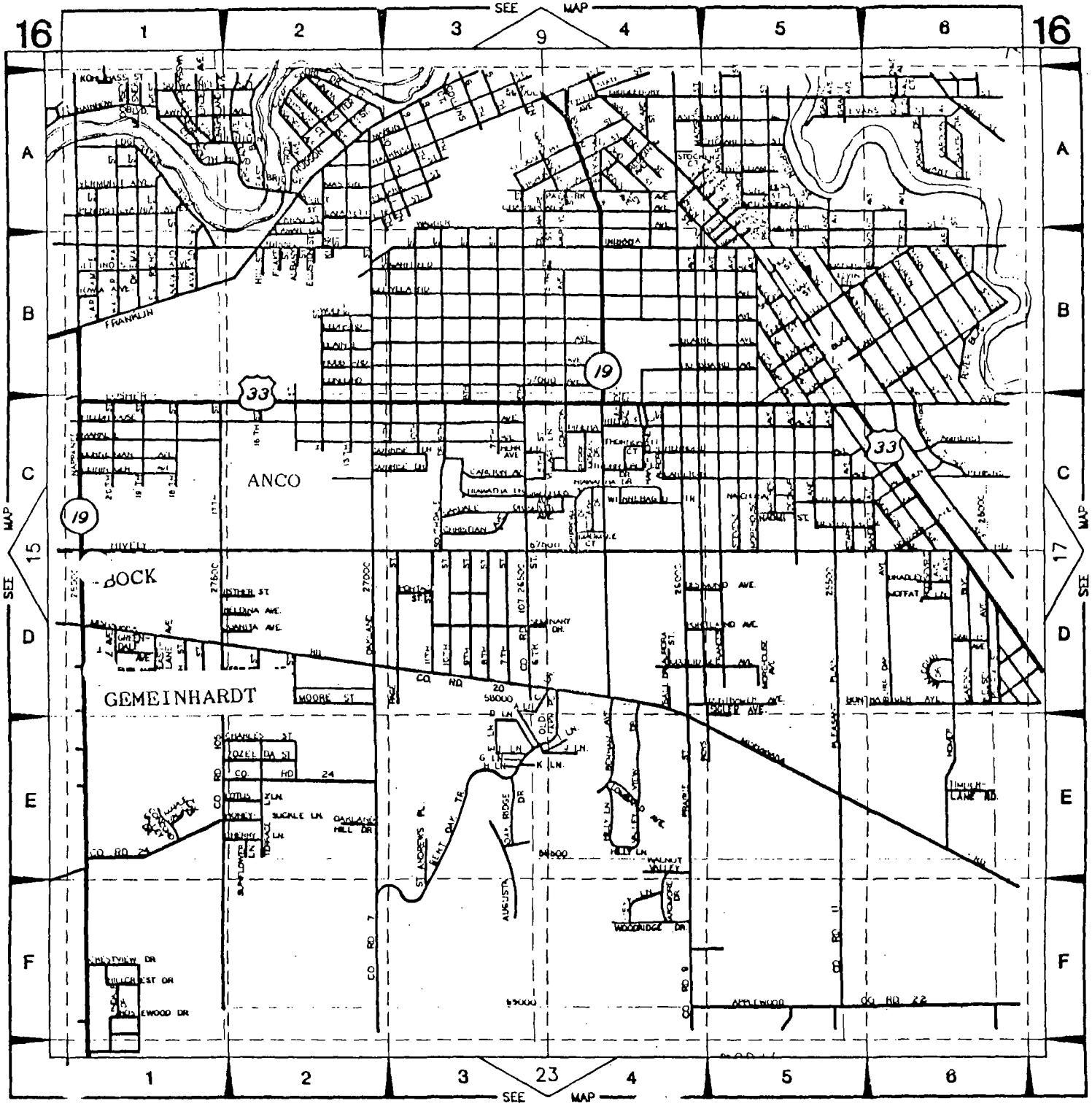
Analyst: R. S. Lynch

Sample description - Anco 4A MW-4
Anco tank assessment

Sample ID = 91-01-148A-4
Parameter: Purgeables(601/02) Date analyzed: February 18, 1991
Matrix: Water Method: Purge & Trap

Compound	Concentration ug/l		Detection Limit ug/l	
Dichlorodifluoromethane		ND	<	1.0
Chloromethane		ND	<	2.0
Vinyl chloride		ND	<	2.0
Chloroethane		ND	<	2.0
Bromoethane		ND	<	1.5
1,1-Dichloroethene		ND	<	0.4
Methylene chloride		ND	<	2.0
t-1,2-Dichloroethene		ND	<	0.2
1,1-Dichloroethane		ND	<	0.3
c-1,2-Dichloroethene		ND	<	0.2
Chloroform		ND	<	1.0
1,1,1-Trichloroethane		ND	<	0.2
Carbon tetrachloride		ND	<	0.2
Benzene		ND	<	0.4
1,2-Dichloroethane		ND	<	0.2
Trichloroethene	21		<	0.5
1,2-Dichloropropane		ND	<	1.0
Bromodichloromethane		ND	<	0.5
2-Chloroethylvinyl ether		ND	<	0.5
t-1,3-Dichloropropene		ND	<	1.0
Toluene		ND	<	0.2
c-1,3-Dichloropropene		ND	<	1.0
1,1,2-Trichloroethane		ND	<	1.0
Tetrachloroethene		ND	<	1.0
Dibromochloromethane		ND	<	1.0
Chlorobenzene		ND	<	0.2
Ethylbenzene		ND	<	0.2
m+p-Xylene		ND	<	0.2
o-Xylene		ND	<	0.2
Bromoform		ND	<	0.9
1,1,2,2-Tetrachloroethane		ND	<	0.7
1,3-Dichlorobenzene		ND	<	0.4
1,4-Dichlorobenzene		ND	<	0.4
1,2-Dichlorobenzene		ND	<	0.4

Analyst: R. S. Lynch


16
SEE MAP 9
16
1
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SEE MAP 15
SEE MAP 17
SEE MAP 23
ANCO
BOCK
GEMEINHARDT
FRANKLIN
19
33
MOORE ST
CO. RD. 24
CO. RD. 7
CO. RD. 22
ST. ANDREWS PL.
FLINT CREEK TR.
AUGUSTA
WOODRIDGE DR.
APPLEWOOD
LANE RD.
MOFFAT
MIDDLEFIELD AVE.
HUNTINGDON AVE.
WALNUT VALLEY
OAKLAND HILL DR.
SUGALE LN.
SUNFLOWER LN.
CHARLES ST.
OZEL PA ST.
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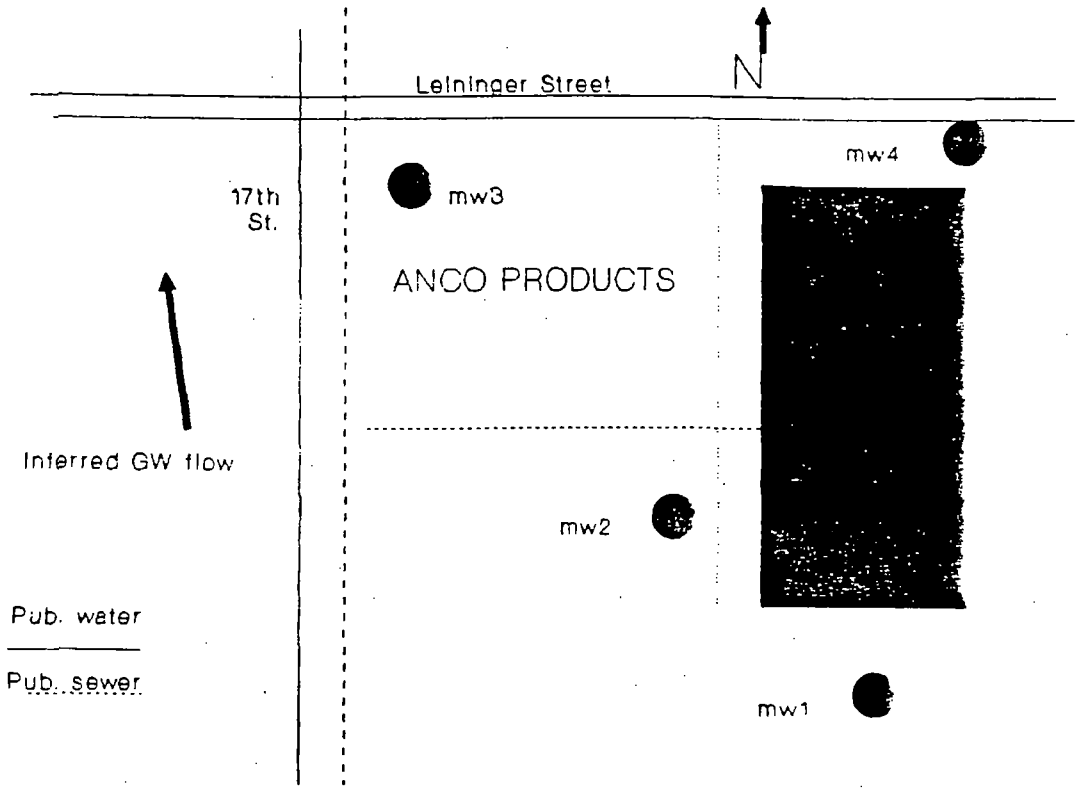
Leininger Street
N
17th St.
mw3
mw4
ANCO PRODUCTS
Inferred GW flow
mw2
Pub. water
Pub. sewer
mw1

12

Anco Products, Incorporated
2500 South 17th Street
Elkhart, Indiana 46517

TCE, TCA Findings

As Prepared By:

Industrial Safety and Environmental Services
716 Lincolnway West
Osceola, Indiana 46561

INDUSTRIAL
SAFETY AND
ENVIRONMENTAL
SERVICES

P.O. BOX 233 • OSCEOLA, IN 46561 • PHONE: (219) 259-4138

February 24, 1994

Mr. Howard Tomlinson
Anco Products, Incorporated
2500 South 17th Street
Elkhart, Indiana 46517

Dear Howard:

On February 4, 1994, the annual sampling of the four (4) monitoring wells at Anco Products (Anco), Incorporated for Volatile organic Compounds (VOC's) was conducted. The annual sampling was recommended by Industrial Safety and Environmental Services (ISES) in the Continuing Investigation Report provided to Anco from ISES.

The attached report is intended to provide an overview of the field investigation performed at Anco.

If you have any questions regarding the information provided, please feel free to contact me at your convenience.

Very Truly Yours,

Dana Simpson

Dana Simpson
Industrial Safety and Environmental Services

1. Introduction

As part of a continuing investigation at Anco Products, Incorporated, 2500 South 17th Street, Elkhart, Indiana, (Project Site), Industrial Safety and Environmental Services (ISES) was retained to assess current groundwater conditions following the closure in 1990 of two (2) underground storage tanks (USTs) located at the project site. Trichloroethylene (TCE) and 1,1,1-Trichloroethane (TCA) were found to be impacting the groundwater at the project site. Since Anco has not used TCE or TCA in their associated industrial processes it would be highly unlikely that Anco would be the source point of contamination. It is because of this that it is believed the migration of TCE and TCA are from an off-site source. An annual sampling program was established for the four (4) monitoring wells installed in 1990 at the project site to monitor that migration.

II. Monitoring Well Sampling

On February 4, 1994, a representative from ISES arrived at the project site for the purpose of collecting groundwater samples from the four (4) monitoring wells. A site map depicting the locations of the four (4) monitoring wells is contained in **Figure II-I**. The samples were collected, labeled, packed on ice and sent to Brighton Analytical, Brighton, Michigan for analysis. The samples were analyzed for Volatile Organic Compounds (VOC's).

During the same site visit, static water levels of the monitoring wells were recorded. The static water levels for February 4, 1994 are contained in **Table II-I**, and the static water levels for March 25, 1993, are contained in **Table II-II** for comparison purposes. A minimum of six (6) well volumes were purged from the monitoring wells due to high solids content.

The monitoring wells (MW) were sampled in the order of MW one (1), MW two (2), MW three (3), and MW four (4), respectively. Sample collection was accomplished using a Teflon Bailer. All field equipment was decontaminated using distilled water for the final rinse.

III. Conclusions

Positive groundwater results are contained in **Table III-I**. For comparison purposes, Table III-I also contains the positive groundwater results from 1990, 1991, and 1993. These

results are provided for comparison purposes. The laboratory analytical results for February 4, 1994 are attached in **Appendix I**.

The results from the sampling analysis suggest that the positive sampling results of TCE and TCA could be gradually leaving the project site. It is recommended that the monitoring wells be sampled biannually to continue to evaluate the water quality and the movement of the TCE and the TCA.

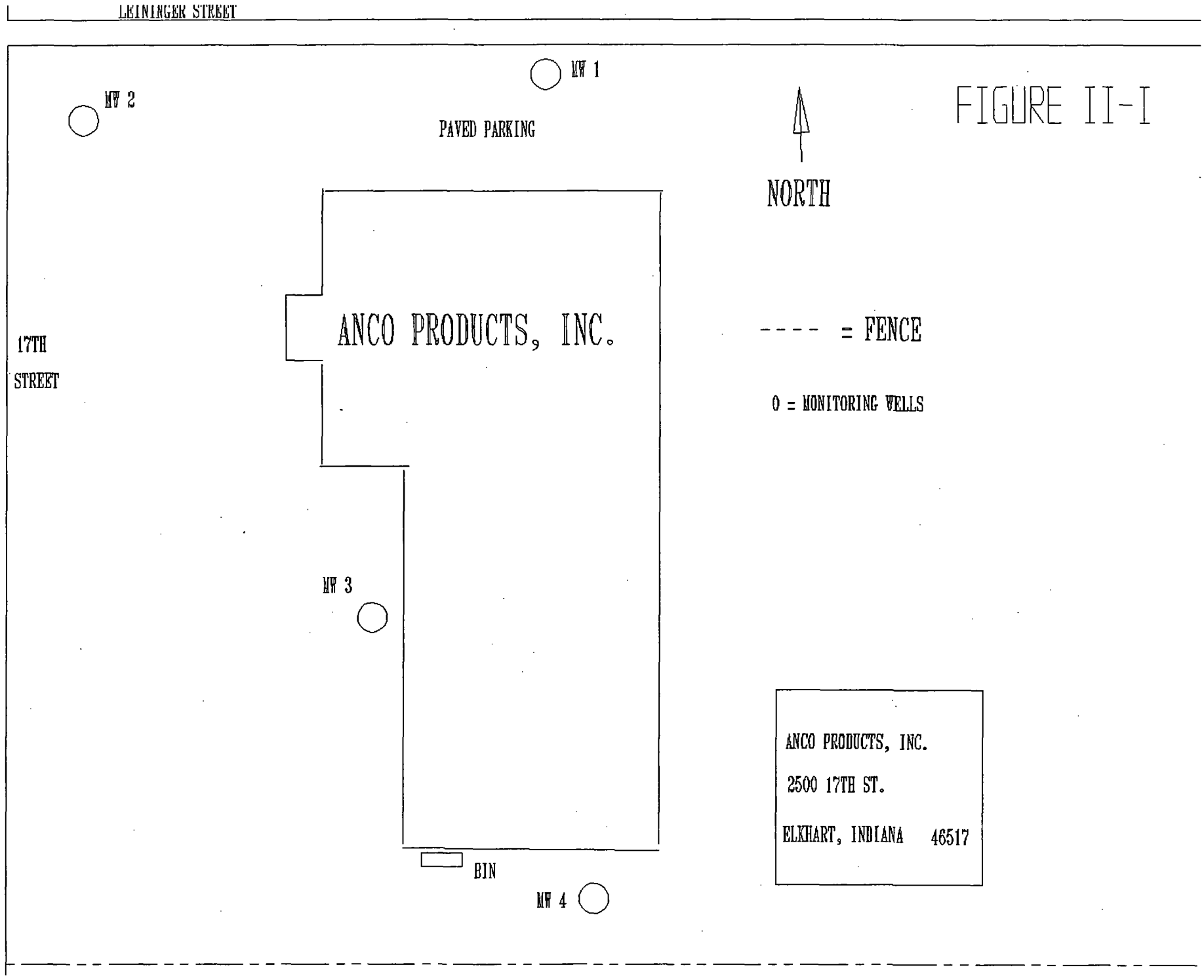
LEININGER STREET
MW 1
MW 2
PAVED PARKING
NORTH
17TH
STREET
ANCO PRODUCTS, INC.
---- = FENCE
0 = MONITORING WELLS
MW 3
BIN
MW 4
ANCO PRODUCTS, INC.
2500 17TH ST.
ELKHART, INDIANA 46517

FIGURE II-I

ANCO PRODUCTS, INCORPORATED **TABLE II-I**

FEBRUARY 4, 1994

Monitoring Well Elevation (Feet)

Monitor Well	Static Level	Top of PVC to Ground Level	Top of PVC to Bottom of Monitoring Well
MW1	12.5'	N/A	24.12'
MW2	15.0'	2.7 1/2'	26.3'
MW3	15.2'	2.8'	27.1'
MW4	13.9'	2.9'	26.1'

Weather Conditions: 31 Degrees
Cloudy

ANCO PRODUCTS, INCORPORATED
ELKHART, INDIANA

MONITORING WELL ELEVATION (FEET)

MARCH 25, 1993

MONITOR WELL	STATIC LEVEL	TOP OF PVC TO GROUND	TOP OF PVC TO BOTTOM OF THE MONITOR WELL
MW 1	12.5	N/A	23.35
MW 2	15.0	2.75	25.6
MW 3	15.2	2.8	25.4
MW 4	13.9	2.9	25.6

WEATHER CONDITIONS: 50 DEGREES; CLOUDY

ANCO PRODUCTS, INCORPORATED
SAMPLE ANALYSIS COMPARISON

TABLE III-I

POSITIVE GROUNDWATER SAMPLING RESULTS

1990 RESULTS

	MW 1	MW 2	MW 3	MW 4
TCE	22	81	6.9	8.9
TCA	ND	ND	4.7	2.6

1991 RESULTS

	MW 1	MW 2	MW 3	MW 4
TCE	13	8.5	64	20
TCA	9.8	3.1	ND	1.2

1993 RESULTS

	MW 1	MW 2	MW 3	MW 4
TCE	17	38	6.8	14
TCA	ND	ND	3.1	3.6

1994 RESULTS

	MW 1	MW 2	MW 3	MW 4
TCE	22	22	5	11
TCA	ND	ND	3	1

Brighton Analytical Inc.

Brighton Analytical, Inc.
718 Advance Street
Brighton, Michigan 48116
Phone: (810)229-7575 FAX: (810)229-8650

Date: 02/14/94

Date Submitted: 02/08/94
Date Sampled: 02/04/94

To: Industrial Safety & Envir.
P.O. Box 233
716 Lincolnway West
Osceola, IN 46561

BA Report Number: **7650**

Project Name: **ANCO Products MW Sampling (Annual)**

Sample ID: **MW-1**

BA Sample ID: **AD01680**

Project Number:

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
Volatile Analysis						
Bromodichloromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Bromoform	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Bromomethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Carbon tetrachloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
2-Chloroethyl vinyl ether	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloroform	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chlorodibromomethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,3-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,4-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Dichlorodifluoromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1-Dichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94

Brighton Analytical Inc.

BA Report Number: **7650**

Project Name: **ANCO Products MW Sampling (Annual)**

Sample ID: **MW-1**

BA Sample ID: **AD01680**

Project Number:

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
1,1-Dichloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
cis,trans-1,2-Dichloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichloropropane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
cis-1,3-Dichloropropene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
trans-1,3-Dichloropropene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Methylene chloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1,2,2-Tetrachloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Tetrachloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1,1-Trichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1,2-Trichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Trichloroethene	**22**	ug/L	1	SW846 8260	MC	02/10/94
Trichlorofluoromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Vinyl chloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Benzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Toluene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Ethyl Benzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Xylenes	**Not detected**	ug/L	3	SW846 8260	MC	02/10/94

DL=Detection Limit

Released by: [illegible]

Date: 2/14/94

Brighton Analytical Inc.

Brighton Analytical, Inc.
718 Advance Street
Brighton, Michigan 48116
Phone: (810)229-7575 FAX: (810)229-8650

Date: 02/14/94

Date Submitted: 02/08/94
Date Sampled: 02/04/94

To: Industrial Safety & Envir.
P.O. Box 233
716 Lincolnway West
Osceola, IN 46561

BA Report Number: **7650**

Project Name: **ANCO Products MW Sampling (Annual)**

Sample ID: **MW-2**

BA Sample ID: **AD01681**

Project Number:

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
Volatile Analysis						
Bromodichloromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Bromoform	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Bromomethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Carbon tetrachloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
2-Chloroethyl vinyl ether	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloroform	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chlorodibromomethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,3-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,4-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Dichlorodifluoromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1-Dichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94

Brighton Analytical Inc.

BA Report Number: **7650**

Project Name: **ANCO Products MW Sampling (Annual)**

Sample ID: **MW-2**

BA Sample ID: **AD01681**

Project Number:

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
1,1-Dichloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
cis,trans-1,2-Dichloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichloropropane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
cis-1,3-Dichloropropene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
trans-1,3-Dichloropropene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Methylene chloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1,2,2-Tetrachloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Tetrachloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1,1-Trichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1,2-Trichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Trichloroethene	**22**	ug/L	1	SW846 8260	MC	02/10/94
Trichlorofluoromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Vinyl chloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Benzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Toluene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Ethyl Benzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Xylenes	**Not detected**	ug/L	3	SW846 8260	MC	02/10/94

DL=Detection Limit

Released by: [illegible]

Date: 2/14/94

Brighton Analytical Inc.

Brighton Analytical, Inc.
718 Advance Street
Brighton, Michigan 48116
Phone: (810)229-7575 FAX: (810)229-8650

Date: 02/14/94

Date Submitted: 02/08/94
Date Sampled: 02/04/94

To: Industrial Safety & Envir.
P.O. Box 233
716 Lincolnway West
Osceola, IN 46561

BA Report Number: **7650**

Project Name: **ANCO Products MW Sampling (Annual)**

Sample ID: **MW-3**

BA Sample ID: **AD01682**

Project Number:

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
Volatile Analysis						
Bromodichloromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Bromoform	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Bromomethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Carbon tetrachloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
2-Chloroethyl vinyl ether	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloroform	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chlorodibromomethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,3-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,4-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Dichlorodifluoromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1-Dichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94

Brighton Analytical Inc.

BA Report Number: **7650**

Project Name: **ANCO Products MW Sampling (Annual)**

Sample ID: **MW-3**

BA Sample ID: **AD01682**

Project Number:

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
1,1-Dichloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
cis,trans-1,2-Dichloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichloropropane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
cis-1,3-Dichloropropene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
trans-1,3-Dichloropropene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Methylene chloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1,2,2-Tetrachloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Tetrachloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1,1-Trichloroethane	**3**	ug/L	1	SW846 8260	MC	02/10/94
1,1,2-Trichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Trichloroethene	**5**	ug/L	1	SW846 8260	MC	02/10/94
Trichlorofluoromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Vinyl chloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Benzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Toluene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Ethyl Benzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Xylenes	**Not detected**	ug/L	3	SW846 8260	MC	02/10/94

DL=Detection Limit

Released by: [illegible]

Date: 2/14/94

Brighton Analytical Inc.

Brighton Analytical, Inc.
718 Advance Street
Brighton, Michigan 48116
Phone: (810)229-7575 FAX: (810)229-8650

Date: 02/14/94

Date Submitted: 02/08/94
Date Sampled: 02/04/94

To: Industrial Safety & Envir.
P.O. Box 233
716 Lincolnway West
Osceola, IN 46561

BA Report Number: **7650**

Project Name: **ANCO Products MW Sampling (Annual)**

Sample ID: **MW-4**

BA Sample ID: **AD01683**

Project Number:

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
Volatile Analysis						
Bromodichloromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Bromoform	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Bromomethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Carbon tetrachloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
2-Chloroethyl vinyl ether	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloroform	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chloromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Chlorodibromomethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,3-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,4-Dichlorobenzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Dichlorodifluoromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1-Dichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94

Brighton Analytical Inc.

BA Report Number: **7650**

Project Name: **ANCO Products MW Sampling (Annual)**

Sample ID: **MW-4**

BA Sample ID: **AD01683**

Project Number:

Parameters	Results	Units	DL	Method Reference	Analyst	Analysis Date
1,1-Dichloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
cis,trans-1,2-Dichloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,2-Dichloropropane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
cis-1,3-Dichloropropene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
trans-1,3-Dichloropropene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Methylene chloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1,2,2-Tetrachloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Tetrachloroethene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
1,1,1-Trichloroethane	**1**	ug/L	1	SW846 8260	MC	02/10/94
1,1,2-Trichloroethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Trichloroethene	**11**	ug/L	1	SW846 8260	MC	02/10/94
Trichlorofluoromethane	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Vinyl chloride	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Benzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Toluene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Ethyl Benzene	**Not detected**	ug/L	1	SW846 8260	MC	02/10/94
Xylenes	**Not detected**	ug/L	3	SW846 8260	MC	02/10/94

DL=Detection Limit

Released by: [illegible]

Date: 2/11/94

Brighton Analytical Inc.

718 Advance St. • Brighton, MI 48116
Phone: (313) 229-7575 • Fax: (313) 229-8650

219
674-8351

CHAIN-OF-CUSTODY

DATE: Feb. 4, 1994 P.O.#

COMPANY: ISES PROJECT #:

PROJECT NAME: ANCO PRODUCTS MW SAMPLING (ANNUAL) RESULTS TO: DANA SIMPSON

TURN-AROUND:
48 HOUR RUSH ☐ surcharge applies
☐ ONE WEEK surcharge applies
☒ STANDARD 14 DAYS

PARAMETERS

SAMPLE DESIGNATION	DATE SAMPLED	MATRIX	LOCATION	# OF CONTAIN	VOC (601/602)							LAB ID
MW 1	2/4/94;8:45	W	ANCO PRODUCTS	2	X							01680
MW 2	2/4/94:9:10	W	ANCO PRODUCTS	2	X							01681
MW 3	2/4/94;9:40	W	ANCO PRODUCTS	2	X							01682
MW 4	2/4/94;10:00	W	ANCO PRODUCTS	2	X							01683

per Dana Simpson

SPECIAL INSTRUCTIONS: Dana Simpson

RELINQUISHED BY: DANA SIMPSON DATE: 2/4/94 TIME: 11:30

RECEIVED BY: via FedEx Express C. Walter 2/8/94 11:30 AM

RELINQUISHED BY: DATE: TIME:

RECEIVED BY:

Anco Products Inc.
2500 South 17th Street
Elkhart, Indiana

Groundwater Sampling and Analysis

As Prepared May 11, 1995 By:
Industrial Safety and Environmental Services (ISES)
716 Lincoln Way West
Osceola, Indiana 46561

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Executive Summary

Conclusions

1. The levels of contamination in the samples are approximately equal to those from the previous sampling. Historically, levels have generally decreased over time.

2. Tetrahydrofuran (THF) was detected in a sample collected from monitoring well one. The well was recently repaired with a THF containing glue. It is the opinion of ISES that the source of the THF in the groundwater sample is most likely the glue used to repair the well.

Recommendations

1. The locks have been removed from the wells and could not be located. ISES recommends that new locks be purchased and be used to secure the monitoring wells. The locks are necessary to ensure that access to the wells is limited to Anco approved personnel.

2. Levels of contamination are still sufficient to pose an environmental detriment to the value of the Anco property. ISES recommends that the annual sampling and analysis of groundwater continue.

3. The presence of THF in the groundwater sample should not be considered serious as the concentration is low and the likely source is small in quantity. No Federal Drinking Water standard exists for the THF. THF will most likely be undetectable in next years samples if the source was the glue.

I. Introduction

This report was generated by Industrial Safety & Environmental Services (ISES), Osceola, Indiana, for Anco Products Inc. (Anco), Elkhart, Indiana. Annual sampling of the monitoring wells was recommended during the course of environmental studies performed at Anco.

This report was written to report the results from the sampling of the groundwater performed on April 3rd and 14th, 1995.

II. Monitoring Well Conditions

On April 3, 1995, all of the monitoring wells were inspected prior to sampling to ascertain their condition. The wells were closed and not open to the elements. Several problem areas were identified.

It was observed that Monitoring well number one (MW #1) had been damaged. The metal cover of the well was missing and the area above the well and throughout the casing was filled with debris. The well cap was crushed onto the wellhead and could not be removed by hand.

ISES did not sample from MW #1 on the initial sampling date. Gary Luft at Anco was informed of the damage to the well. Mr. Luft informed ISES personnel that he would arrange for the repair of the well.

It was also observed that the wells were missing locks. The wells should be locked to prevent their misuse. It is not known who removed the locks or where they may be. A recommendation to this affect is included in **Section VI** of this document.

On April 14, 1994, ISES assessed the condition of MW #1. The well appeared to be repaired, however, it could not be discerned if the well had been repaired with glue. The use of glue to repair the well can cause contamination of samples collected from the well.

III. Measurement of Static Water Levels

The static water level in the wells was measured before the wells were purged. The measurement was performed using a Model 51453 Water Level Indicator manufactured by the Slope Indicator Company of Seattle, Washington and a fiberglass measuring tape with markings for tenths and hundredths of a foot.

A map of the location of the monitoring wells is located in **Appendix I** as **Figure 1**. A table of the results of the measurements is included in **Appendix II** as **Table 1**.

A map depicting the static water table was not created for this report. The repair of MW #1 changed the elevation of the wellhead so as to make the survey data inaccurate. Without accurate well elevations a map of the static water table could not be created.

IV. Groundwater Sampling

The wells were opened and purged before sampling. Purging of the wells was performed using disposable teflon bailers. Three volumes of the groundwater in the well were purged from the well prior to sampling.

The water from the purging of the wells was stored on-site at Anco until laboratory analysis could determine the character of the waste. The purging water was stored in a closed plastic lined cardboard drum.

Each sample was collected in two (2) forty milliliter (40 ml) vials. The samples were labeled with the sample identification, date, time, and sampler initials.

Immediately after labeling, the samples were placed in an insulated cooler containing ice. The samples were presented to a representative of B.E.C. Laboratories, Toledo, Ohio (BEC) on the day of sampling.

V. Laboratory Analysis and Results

Analysis were performed on the samples by BEC. The analysis included EPA Method 8240 for volatile organic compounds.

The results of the analysis are presented in **Table 2a** and **2b** in **Appendix II**. A copy of the laboratory results and chain of custody documentation is located in **Appendix III**.

A level of 7.87 parts per billion (ppb) of Tetrahydrofuran (THF), was detected in the sample collected from MW #1. This chemical was not detected in groundwater samples collected previously. A Material Safety Data Sheet (MSDS) for THF is included in **Appendix IV** for reference.

As stated before, personnel from Anco repaired the top portion of MW #1. THF is used in Polyvinyl Chloride (PVC) glues. Al Guantanio confirmed that glue was used to repair MW #1.

VI. Conclusions and Recommendations

Conclusions

1. The levels of contamination in the samples are approximately equal to those from the previous sampling. Historically, levels have generally decreased over time. There is no known information to account for the lack of change in the contamination levels.

2. Tetrahydrofuran (THF) was detected in monitoring well one (MW #1). The well was recently repaired with a THF containing glue. It is the opinion of ISES that the source of the THF in the groundwater is most likely from the glue used to repair the well.

Recommendations

1. The locks were removed from the wells and could not be located. ISES recommends that new locks be purchased and be used to secure the monitoring wells. The locks are necessary to ensure that access to the wells is limited to Anco approved personnel.

   All companies should try to protect to their physical assets and limit possible liabilities. Industrial sabotage by disgruntled employees can cause extreme financial hardship even in cases where the criminal is apprehended. Although simple precautions cannot stop a determined criminal, they can hinder and discourage most individuals inclined to cause your company harm.

2. Levels of contamination are still sufficient to pose an environmental detriment to the value of the Anco property. As such, ISES recommends that the annual sampling and analysis of groundwater continue.

   It cannot be determined from the available data why the level of contamination has not decreased. The contamination levels have generally decreased during the monitoring of the groundwater.

3. The presence of THF in the groundwater sample should not be considered serious as the concentration is low. The most likely source, the well repair glue, is small in quantity and the level should drop off if the glue is truly the source.

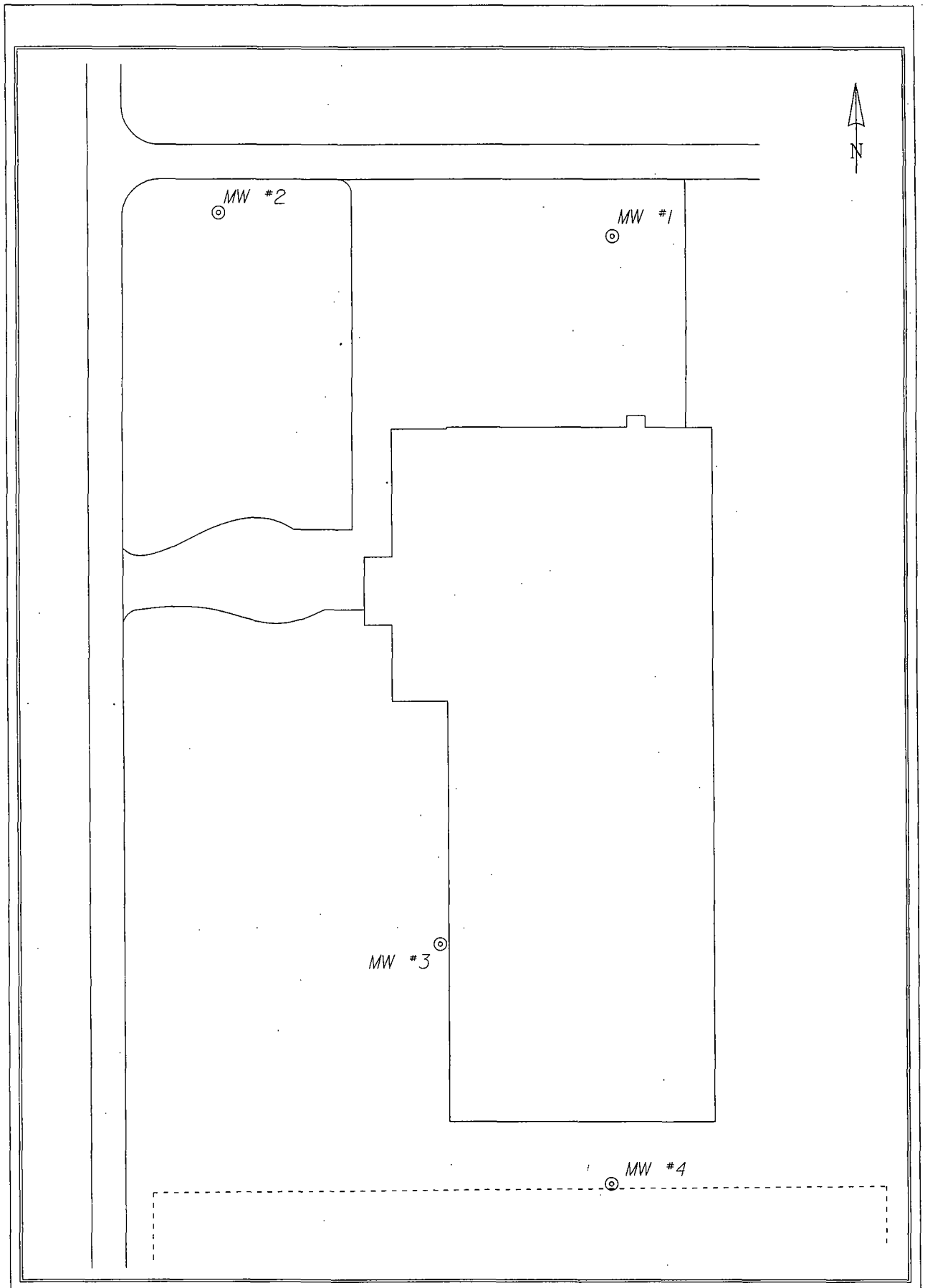
   There is currently no Federal Drinking Water standard for the chemical. It is therefore unnecessary to report the detection of THF in groundwater. If glue is the source of the THF, the groundwater sampling and analysis performed next year will most likely show that THF is not present in the groundwater in detectable levels.

VII. Limitations of Assessment

This assessment was performed in a manner consistent with standards typically applied to a basic statement of professional opinion. The assessment is based partially on information obtained from others and Industrial Safety and Environmental Services makes no representation or warranty concerning the accuracy or completeness of this analysis.

Some information, recommendations, and suggestions contained within this report may be subject to interpretation and differing conclusions are possible. The information contained in this report was developed from information available at the time the report was compiled. Industrial Safety and Environmental Services does not assume liability for financial or other losses or subsequent damage caused by or related to any use of this document.

Appendix I



Sheet 1 OF 1	ANCO PRODUCTS INC. ELKHART, INDIANA MONITORING WELL LOCATIONS	Job ID: 004683 Date: 5/11/95 Scale: 1" = 100' Drawn By: NB	Revisions	Industrial Safety and Environmental Services PO Box 233 Osceola, Indiana 46561 (219) 674-8357 259-4138

Appendix II

Table 1 - Static Water Level Determinations

Monitoring Well	Well Elevation	Depth to Groundwater	Static Water Level
MW #1	97.03	13.73	83.30
MW #2	100.00	17.02	82.98
MW #3	101.26	17.50	83.76
MW #4	100.53	18.47	82.06

All levels in feet. All elevations based on assumed MW #2 elevation of 100.00 ft.
* Wellhead repair may have caused elevation change

Table 2a - 1,1,1 Trichlrorethane (TCA)

Well	1990	1991	1993	1994	1995
MW #1	ND	9.8	ND	ND	ND
MW #2	ND	3.1	ND	ND	ND
MW #3	4.7	ND	3.1	3	3.17
MW #4	2.6	1.2	3.6	1	2.36

All results in parts per billion (ppb)

Table 2b - Trichloroethene (TCE)

Well	1990	1991	1993	1994	1995
MW #1	22	13	17	22	25.4
MW #2	81	8.5	38	22	22.9
MW #3	6.9	64	6.8	5	5.16
MW #4	8.9	20	14	11	6.56

All results in parts per billion (ppb)

Appendix III

Industrial Safety and Environmental
P.O. Box 233

Osceola, IN 46561
ATTN: Nathan Bair

HEADQUARTERS/LABORATORY
705 FRONT STREET
TOLEDO, OHIO 43605
PHONE: (419) 693-5307
FAX: (419) 691-0418

ENVIRONMENTAL LABORATORY
1632 ENTERPRISE PARKWAY
TWINSBURG, OHIO 44087
PHONE: (216) 425-8200
FAX: (216) 425-1349

lab no. 95T05525
p.o. no.

rev: 0

SAMPLE DESCRIPTION: Anco - grab - MW # 3 G. water - 4/3/95 @ 11:00

ANALYSIS: VOA

PROCEDURE: The sample was analyzed as outlined in US EPA "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", SW-846, Third Edition, November, 1986, Method 8260.

RESULTS:

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
Acrolein	10	< 10
Acrylonitrile	10	< 10
Acetone	10	< 10
Benzene	1	< 1
Bromodichloromethane	1	< 1
Bromoform	1	< 1
Bromomethane	1	< 1
2-Butanone (MEK)	10	< 10
Carbon disulfide	1	< 1
Carbon tetrachloride	1	< 1
Chlorobenzene	1	< 1
Chlorodibromomethane	1	< 1
Chloroethane	2	< 2
2-Chloroethyl Vinyl Ether	2	< 2
Chloroform	1	< 1
Chloromethane	1	< 1
1,2-Dibromoethane (EDB)	1	< 1
Dibromomethane	1	< 1
1,2-Dichlorobenzene	1	< 1
1,3-Dichlorobenzene	1	< 1
1,4-Dichlorobenzene	1	< 1
1,4-Dichloro-2-butene	2	< 2
Dichlorodifluoromethane	1	< 1
1,1-Dichloroethane	1	< 1
1,2-Dichloroethane	1	< 1

date completed:	tech:	approved by:
04/07/95	JM	

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FAX: (216) 425-1349

lab no. 95T05525
p.o. no.

rev: 0

SAMPLE
DESCRIPTION: Anco - grab - MW # 3 G. water - 4/3/95 @ 11:00

ANALYSIS: VOA

RESULTS: continued

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
1,1-Dichloroethene	1	< 1
cis-1,2-Dichloroethene	1	< 1
trans-1,2-Dichloroethene	1	< 1
1,2-Dichloropropane	1	< 1
cis-1,3-Dichloropropene	1	< 1
trans-1,3-Dichloropropene	1	< 1
Ethyl Acetate	1	< 1
Ethyl Benzene	1	< 1
Ethyl Ether	2	< 2
Ethyl methacrylate	1	< 1
2-Hexanone	2	< 2
Methylene Chloride	1	< 1
Methyl iodide	1	< 1
4-Methyl-2-pentanone (MIBK)	10	< 10
Naphthalene	1	< 1
Styrene	1	< 1
1,1,1,2-Tetrachloroethane	1	< 1
1,1,2,2-Tetrachloroethane	1	< 1
Tetrachloroethene	1	< 1
Tetrahydrofuran	1	< 1
Toluene	1	< 1
1,1,1-Trichloroethane	1	3.17
1,1,2-Trichloroethane	1	< 1
Trichloroethene	1	5.16
Trichlorofluoromethane	1	< 1

date completed:	tech:	approved by:
04/07/95	JM	

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lab no. 95T05525
p.o. no.

rev: 0

SAMPLE DESCRIPTION: Anco - grab - MW # 3 G. water - 4/3/95 @ 11:00

ANALYSIS: VOA

RESULTS: continued

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
1,1,2-Trichloro-1,2,2-Trifluoroethane (Freon 113)	1	< 1
1,2,3-Trichloropropane	1	< 1
Vinyl acetate	2	< 2
Vinyl chloride	1	< 1
m & p-Xylenes	1	< 1
o-Xylenes	1	< 1

SURROGATES:

Compound	% Recovery	Acceptable Range
1,2-Dichloroethane-d4	109	76-114
Toluene-d8	103	88-110
4-Bromofluorobenzene	102	86-115

1) A value reported as "less than" indicates the analyte was not detected. The number is the quantification limit for the sample.

date completed:	tech:	approved by:
04/07/95	JM	

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PHONE: (216) 425-8200
FAX: (216) 425-1349

lab no. 95T05524
p.o. no.

rev: 0

SAMPLE DESCRIPTION: Anco - grab - MW # 2 G. water - 4/3/95 @ 10:39

ANALYSIS: VOA

PROCEDURE: The sample was analyzed as outlined in US EPA "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", SW-846, Third Edition, November, 1986, Method 8260.

RESULTS:

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
Acrolein	10	< 10
Acrylonitrile	10	< 10
Acetone	10	< 10
Benzene	1	< 1
Bromodichloromethane	1	< 1
Bromoform	1	< 1
Bromomethane	1	< 1
2-Butanone (MEK)	10	< 10
Carbon disulfide	1	< 1
Carbon tetrachloride	1	< 1
Chlorobenzene	1	< 1
Chlorodibromomethane	1	< 1
Chloroethane	2	< 2
2-Chloroethyl Vinyl Ether	2	< 2
Chloroform	1	< 1
Chloromethane	1	< 1
1,2-Dibromoethane (EDB)	1	< 1
Dibromomethane	1	< 1
1,2-Dichlorobenzene	1	< 1
1,3-Dichlorobenzene	1	< 1
1,4-Dichlorobenzene	1	< 1
1,4-Dichloro-2-butene	2	< 2
Dichlorodifluoromethane	1	< 1
1,1-Dichloroethane	1	< 1
1,2-Dichloroethane	1	< 1

date completed:	tech:	approved by:
04/10/95	PDB/KJY	

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PHONE: (216) 425-8200
FAX: (216) 425-1349

lab no. 95T05524
p.o. no.

rev: 0

SAMPLE
DESCRIPTION: Anco - grab - MW # 2 G. water - 4/3/95 @ 10:39

ANALYSIS: VOA

RESULTS: continued

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
1,1-Dichloroethene	1	< 1
cis-1,2-Dichloroethene	1	< 1
trans-1,2-Dichloroethene	1	< 1
1,2-Dichloropropane	1	< 1
cis-1,3-Dichloropropene	1	< 1
trans-1,3-Dichloropropene	1	< 1
Ethyl Acetate	1	< 1
Ethyl Benzene	1	< 1
Ethyl Ether	2	< 2
Ethyl methacrylate	1	< 1
2-Hexanone	2	< 2
Methylene Chloride	1	< 1
Methyl iodide	1	< 1
4-Methyl-2-pentanone (MIBK)	10	< 10
Naphthalene	1	< 1
Styrene	1	< 1
1,1,1,2-Tetrachloroethane	1	< 1
1,1,2,2-Tetrachloroethane	1	< 1
Tetrachloroethene	1	< 1
Tetrahydrofuran	1	< 1
Toluene	1	< 1
1,1,1-Trichloroethane	1	< 1
1,1,2-Trichloroethane	1	< 1
Trichloroethene	1	22.9
Trichlorofluoromethane	1	< 1

date completed:	tech:	approved by:
04/10/95	PDB/KJY	

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lab no. 95T05524
p.o. no.

rev: 0

SAMPLE DESCRIPTION: Anco - grab - MW # 2 G. water - 4/3/95 @ 10:39

ANALYSIS: VOA

RESULTS: continued

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
1,1,2-Trichloro-1,2,2-Trifluoroethane (Freon 113)	1	< 1
1,2,3-Trichloropropane	1	< 1
Vinyl acetate	2	< 2
Vinyl chloride	1	< 1
m & p-Xylenes	1	< 1
o-Xylenes	1	< 1

SURROGATES:

Compound	% Recovery	Acceptable Range
1,2-Dichloroethane-d4	106	76-114
Toluene-d8	96.6	88-110
4-Bromofluorobenzene	99.2	86-115

1) A value reported as "less than" indicates the analyte was not detected. The number is the quantification limit for the sample.

Date completed:	tech:	approved by:
04/10/95	PDB/KJY	

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lab no. 95T05526
p.o. no.

rev: 0

SAMPLE DESCRIPTION: Anco - grab - MW # 4 G. water - 4/3/95 @ 11:25

ANALYSIS: VOA

PROCEDURE: The sample was analyzed as outlined in US EPA "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", SW-846, Third Edition, November, 1986, Method 8260.

RESULTS:

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
Acrolein	10	< 10
Acrylonitrile	10	< 10
Acetone	10	< 10
Benzene	1	< 1
Bromodichloromethane	1	< 1
Bromoform	1	< 1
Bromomethane	1	< 1
2-Butanone (MEK)	10	< 10
Carbon disulfide	1	< 1
Carbon tetrachloride	1	< 1
Chlorobenzene	1	< 1
Chlorodibromomethane	1	< 1
Chloroethane	2	< 2
2-Chloroethyl Vinyl Ether	2	< 2
Chloroform	1	< 1
Chloromethane	1	< 1
1,2-Dibromoethane (EDB)	1	< 1
Dibromomethane	1	< 1
1,2-Dichlorobenzene	1	< 1
1,3-Dichlorobenzene	1	< 1
1,4-Dichlorobenzene	1	< 1
1,4-Dichloro-2-butene	2	< 2
Dichlorodifluoromethane	1	< 1
1,1-Dichloroethane	1	< 1
1,2-Dichloroethane	1	< 1

date completed:	tech:	approved by:
04/10/95	JM/KJY	

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FAX: (216) 425-1349

lab no. 95T05526
p.o. no.

rev: 0

SAMPLE
DESCRIPTION: Anco - grab - MW # 4 G. water - 4/3/95 @ 11:25

ANALYSIS: VOA

RESULTS: continued

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
1,1-Dichloroethene	1	< 1
cis-1,2-Dichloroethene	1	< 1
trans-1,2-Dichloroethene	1	< 1
1,2-Dichloropropane	1	< 1
cis-1,3-Dichloropropene	1	< 1
trans-1,3-Dichloropropene	1	< 1
Ethyl Acetate	1	< 1
Ethyl Benzene	1	< 1
Ethyl Ether	2	< 2
Ethyl methacrylate	1	< 1
2-Hexanone	2	< 2
Methylene Chloride	1	< 1
Methyl iodide	1	< 1
4-Methyl-2-pentanone (MIBK)	10	< 10
Naphthalene	1	< 1
Styrene	1	< 1
1,1,1,2-Tetrachloroethane	1	< 1
1,1,2,2-Tetrachloroethane	1	< 1
Tetrachloroethene	1	< 1
Tetrahydrofuran	1	< 1
Toluene	1	< 1
1,1,1-Trichloroethane	1	2.36
1,1,2-Trichloroethane	1	< 1
Trichloroethene	1	6.56
Trichlorofluoromethane	1	< 1

date completed:	tech:	approved by:
04/10/95	JM/KJY	

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FAX: (216) 425-1349

lab no. 95T05526
p.o. no.

rev: 0

SAMPLE DESCRIPTION: Anco - grab - MW # 4 G. water - 4/3/95 @ 11:25

ANALYSIS: VOA

RESULTS: continued

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
1,1,2-Trichloro-1,2,2-Trifluoroethane (Freon 113)	1	< 1
1,2,3-Trichloropropane	1	< 1
Vinyl acetate	2	< 2
Vinyl chloride	1	< 1
m & p-Xylenes	1	< 1
o-Xylenes	1	< 1

SURROGATES:

Compound	% Recovery	Acceptable Range
1,2-Dichloroethane-d4	111	76-114
Toluene-d8	105	88-110
4-Bromofluorobenzene	105	86-115

1) A value reported as "less than" indicates the analyte was not detected. The number is the quantification limit for the sample.

date completed:	tech:	approved by:
04/10/95	JM/KJY	

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toledo, ohio 43605
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1632 enterprise parkway
twinsburg, ohio 44087
(216) 425-8200

CHAIN OF CUSTODY RECORD

CLIENT NAME: ~~ANCO~~ ISES

SAMPLERS: (SIGNATURE)

PROJECT NUMBER:

PROJECT NAME: ANCO

ANALYSIS: 8260

STATION NUMBER	DATE	TIME	COMPOSITE	GRAB	SAMPLE DESCRIPTION INCLUDING MATRIX & PROJECT	NUMBER OF CONTAINERS	8260									REMARKS
	4/3/95	10:31		✓	MW #2 GWATER	2	✓									95T05524
					~~DW~~	~~X~~										
	4/3/95	11:00		✓	MW #3 GWATER	2	✓									5525
	4/3/95	11:25		✓	MW #4 GWATER	2	✓									5526

RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME	RECEIVED FOR LAB: (SIGNATURE)	DATE	TIME
[illegible]	4/3/95	[illegible]	[illegible]	4/3/95	3:56	Patricia Vandenhoven	4/4/95	12:30 pm
[illegible]	4/3/95	4:45						

SAMPLE MAY BE RETURNED TO CLIENT AT BEC's DISCRETION, UNLESS ARRANGEMENTS HAVE BEEN MADE PRIOR TO SAMPLE SUBMISSION.

Industrial Safety and Environmental
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TWINSBURG, OHIO 44087
PHONE: (216) 425-8200
FAX: (216) 425-1349

lab no. 95T06066
p.o. no.

rev: 0

SAMPLE DESCRIPTION: Anco - grab - MW # 1 - 4/14/95 @ 13:49

ANALYSIS: VOA

PROCEDURE: The sample was analyzed as outlined in US EPA "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", SW-846, Third Edition, November, 1986, Method 8240.

RESULTS:

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
Acrolein	10	< 10
Acrylonitrile	10	< 10
Acetone	10	< 10
Benzene	1	< 1
Bromodichloromethane	1	< 1
Bromoform	1	< 1
Bromomethane	1	< 1
2-Butanone (MEK)	10	< 10
Carbon disulfide	1	< 1
Carbon tetrachloride	1	< 1
Chlorobenzene	1	< 1
Chlorodibromomethane	1	< 1
Chloroethane	2	< 2
2-Chloroethyl Vinyl Ether	2	< 2
Chloroform	1	< 1
Chloromethane	1	< 1
1,2-Dibromoethane (EDB)	1	< 1
Dibromomethane	1	< 1
1,2-Dichlorobenzene	1	< 1
1,3-Dichlorobenzene	1	< 1
1,4-Dichlorobenzene	1	< 1
1,4-Dichloro-2-butene	2	< 2
Dichlorodifluoromethane	1	< 1
1,1-Dichloroethane	1	< 1
1,2-Dichloroethane	1	< 1

date completed:	tech:	approved by:
04/18/95	JM	Margaret M. Nagura

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lab no. 95T06066
p.o. no.

rev: 0

SAMPLE
DESCRIPTION: Anco - grab - MW # 1 - 4/14/95 @ 13:49

ANALYSIS: VOA

RESULTS: continued

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
1,1-Dichloroethene	1	< 1
cis-1,2-Dichloroethene	1	< 1
trans-1,2-Dichloroethene	1	< 1
1,2-Dichloropropane	1	< 1
cis-1,3-Dichloropropene	1	< 1
trans-1,3-Dichloropropene	1	< 1
Ethyl Acetate	1	< 1
Ethyl Benzene	1	< 1
Ethyl Ether	2	< 2
Ethyl methacrylate	1	< 1
2-Hexanone	2	< 2
Methylene Chloride	1	< 1
Methyl iodide	1	< 1
4-Methyl-2-pentanone (MIBK)	10	< 10
Naphthalene	1	< 1
Styrene	1	< 1
1,1,1,2-Tetrachloroethane	1	< 1
1,1,2,2-Tetrachloroethane	1	< 1
Tetrachloroethene	1	< 1
Tetrahydrofuran	1	7.87
Toluene	1	< 1
1,1,1-Trichloroethane	1	< 1 (0.520)
1,1,2-Trichloroethane	1	< 1
Trichloroethene	1	25.4
Trichlorofluoromethane	1	< 1

date completed:	tech:	approved by:
04/18/95	JM	

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lab no. 95T06066
p.o. no.

rev: 0

SAMPLE
DESCRIPTION: Anco - grab - MW # 1 - 4/14/95 @ 13:49

ANALYSIS: VOA

RESULTS: continued

COMPOUND	LOW LEVEL METHOD PQL (ug/L)	RESULT (ug/L)
1,1,2-Trichloro-1,2,2-Trifluoroethane (Freon 113)	1	< 1
1,2,3-Trichloropropane	1	< 1
Vinyl acetate	2	< 2
Vinyl chloride	1	< 1
m & p-Xylenes	1	< 1
o-Xylenes	1	< 1

SURROGATES:

Compound	% Recovery	Acceptable Range
1,2-Dichloroethane-d4	90.2	76-114
Toluene-d8	100	88-110
4-Bromofluorobenzene	98.8	86-115

1) A value reported as "less than" indicates the analyte was not detected. The number is the quantification limit for the sample.
2) A value in parenthesis following a "less than" value indicates the analyte was detectable but below the limit of quantification. The value is an estimate only.

date completed:	tech:	approved by:
04/18/95	JM	Margaret M. Lagueux

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CHAIN OF CUSTODY RECORD

CLIENT NAME: ISES

SAMPLERS: (SIGNATURE)

PROJECT NUMBER:

PROJECT NAME: ANCO

ANALYSIS

STATION NUMBER	DATE	TIME	COMPOSITE	GRAB	SAMPLE DESCRIPTION INCLUDING MATRIX & PROJECT	NUMBER OF CONTAINERS	CC/MS 8240									REMARKS
	4/14/95	13:49		✓	MW #1	2	✓									95T06066

RELINQUISHED BY:	(SIGNATURE)	DATE	TIME	RECEIVED BY:	(SIGNATURE)	DATE	TIME	RECEIVED FOR LAB: (SIGNATURE)	DATE	TIME
		4/14/95	1600			4/14/95	1600	Patricia Vanderhorst	4/17/95	1315
RELINQUISHED BY:	(SIGNATURE)	DATE	TIME	RECEIVED BY:	(SIGNATURE)	DATE	TIME			
		4-17-95	13:15							
RELINQUISHED BY:	(SIGNATURE)	DATE	TIME	RECEIVED BY:	(SIGNATURE)	DATE	TIME			
RELINQUISHED BY:	(SIGNATURE)	DATE	TIME	RECEIVED BY:	(SIGNATURE)	DATE	TIME			

SAMPLE MAY BE RETURNED TO CLIENT AT BEC's DISCRETION, UNLESS ARRANGEMENTS HAVE BEEN MADE PRIOR TO SAMPLE SUBMISSION.

Appendix IV

Genium Publishing Corporation
One Genium Plaza
Schenectady, NY 12304-4690 USA
(518) 377-8854

Section 1. Material Identification

Tetrahydrofuran ($CH_2CH_2CH_2CH_2O$) Description: Derived by catalytic hydrogenation of maleic anhydride or furan (with a nickel catalyst), or by acid-catalyzed dehydration of 1,4-butanediol. To prevent peroxide formation, it is stabilized with 0.025% butylated hydroxytoluene, 0.05 to 1% *p*-cresol, 0.05 to 1% hydroquinone, or 0.01 to 1% 4,4'-thiobis (6-*t*-butyl-*m*-cresol). Used as a solvent in histological techniques or for high polymers such as polyvinyl chloride; as a reaction medium for Grignard and metal hydride reactions; for synthesis of butyrolactone, succinic acid, and 1,4-butanediol diacetate; in topcoating solutions, polymer coatings, cellophane, lacquers, magnetic tapes, and printing inks; in food packaging as long as residual amount is < 1.5% of the film; and as a Lewis base to moderate the extreme reactivity of sulfur trioxide.

Other Designations: CAS No. 109-99-9, butylene oxide, cyclotetramethylene oxide, diethylene oxide, 1,4-epoxybutane, Furanidine, hydrofuran, NCI-C60560, oxacyclopentane, Oxolane, tetramethylene oxide, THF.

Manufacturer: Contact your supplier or distributor. Consult latest *Chemical Week Buyers' Guide*[73] for a suppliers list.

Cautions: THF in concentrations greater than 20% are irritating to the eyes, nose, and respiratory tract. It produces central nervous system (CNS) depression from inhalation of high concentrations. Tetrahydrofuran is highly flammable and forms explosive peroxides when uninhibited and exposed to air. Use with care!

R	2
I	2
S	3
K	4

NFPA

HMIS
H 2
F 3
R 2
PPE*
* Sec. 8

Section 2. Ingredients and Occupational Exposure Limits

Tetrahydrofuran, ca <99%

1991 OSHA PELs
8-hr TWA: 200 ppm (590 mg/m^3)
15-min STEL: 250 ppm (735 mg/m^3)

1990 IDLH Level
20,000 ppm

1991-92 ACGIH TLVs
TWA: 200 ppm (590 mg/m^3)
STEL: 250 ppm (737 mg/m^3)

1990 DFG (Germany) MAK
Ceiling: 200 ppm (590 mg/m^3)
Category II: Substances with systemic effects
Half-life: 2 hr to shift end
Peak Exposure Limit: 1000 ppm, 30 min average value, 2/shift

1985-86 Toxicity Data*
Human, inhalation, TC_{Lo}: 25,000 ppm caused general anesthesia.
Rat, oral, LD_{50}: 2816 mg/kg; no toxic effect noted
Rat, inhalation, LC_{50}: 21,000 ppm/3 hr produced sleep, respiratory stimulation, and nausea or vomiting.

1990 NIOSH RELs
TWA: 200 ppm (590 mg/m^3)
STEL: 250 ppm (735 mg/m^3)

* See NIOSH, *RTECS* (LU5950000), for additional mutation and toxicity data.

Section 3. Physical Data

Boiling Point: 151 °F (66 °C)
Melting Point: -163 °F (-108 °C)
Relative Evaporation Rate (BuAc = 1): 8
Odor Threshold: 30 to 60 ppm
Surface Tension: 28 dyne/cm at 68 °F (20 °C)
Ionization Potential: 9.45 eV
Critical Temperature: 512.6 °F (267 °C)
Critical Pressure: 51.2 atm
Viscosity: 0.48 cP at 68 °F (20 °C)

Molecular Weight: 72.12
Density: 0.8892 at 68 °F (20/4 °C)
Water Solubility: Soluble, 30% at 77 °F (25 °C)
Other Solubilities: Soluble in alcohol, ketones, esters, ethers, and hydrocarbons.
Refraction Index: 1.4070 at 68 °F (20 °C)
Vapor Pressure: 114 mm Hg at 59 °F (15 °C); 145 mm Hg at 68 °F (20 °C)
Saturated Vapor Density (Air = 0.075 lb/ft^3 or 1.2 kg/m^3): 0.096 lb/ft^3 or 1.539 kg/m^3
pH: ~ 7 (aqueous solution)
Appearance and Odor: Water-white to clear liquid with a fruity odor and pungent taste.

Section 4. Fire and Explosion Data

Flash Point: 5 °F (-15 °C) OC	Autoignition Temperature: 610 °F (321 °C)	LEL: 2% v/v	UEL: 11.8% v/v

Extinguishing Media: THF is a Class 1B Flammable Liquid. For small fires, use dry chemical, carbon dioxide, water spray, or 'alcohol-resistant' foam. For large fires, use water spray, fog, or 'alcohol-resistant' foam. **Unusual Fire or Explosion Hazards:** Vapors may travel to an ignition source and flash back. Containers may rupture in fire. Burning rate = 4.7 mm/min. Uninhibited THF forms explosive peroxides in air. Due to its volatility, even dilute THF-water mixtures present a fire hazard. **Special Fire-fighting Procedures:** Because fire may produce toxic thermal decomposition products, wear a self-contained breathing apparatus (SCBA) with a full facepiece operated in pressure-demand or positive-pressure mode. Structural firefighters' protective clothing provides only limited protection. If fire becomes uncontrollable, evacuate for a 1500 ft radius. If possible without risk, move container from fire area or apply cooling water to sides of container until well after fire is out. Stay away from ends of tanks. For massive fire in cargo area, use monitor nozzles or unmanned hose holders; if impossible, withdraw and let fire burn. Withdraw from fire if you hear a rising sound from venting safety device or notice any tank discoloration due to fire. Do not release runoff from fire control methods to sewers or waterways.

Section 5. Reactivity Data

Stability/Polymerization: THF forms explosive (>1%) peroxides when exposed to air or sunlight. It is inhibited (Sec. 1) to prevent peroxide formation. Hazardous polymerization may occur in the presence of cationic initiators such as strong proton acids or selected Lewis acids. **Chemical Incompatibilities:** THF will attack some forms of plastics, rubber, and coatings. It is explosive with potassium hydroxide, sodium hydroxide, and sodium tetrahydroaluminate since caustic alkalies deplete the inhibitor; reacts with potassium dioxide 2-aminophenol to form an explosive product; reacts violently with metal halides; forms explosive hydrogen gas with borane or lithium tetrahydroaluminate and reacts vigorously with bromine and calcium hydride + heat. Also incompatible with sulfinyl chloride and oxidizing materials. **Conditions to Avoid:** Exposure to heat, ignition sources, and incompatibles. **Hazardous Products of Decomposition:** Thermal oxidative decomposition of THF can produce carbon oxides and irritating vapors. **Other:** Because distillation or alkali treatment of stabilized THF removes the involatile antioxidant, it must be restabilized or stored under nitrogen to prevent peroxide formation. Do not store more than a few days without a stabilizer. Sodium benzophenone ketyl or an activated alumina column have been used to remove moisture and peroxides. Peroxides may also be destroyed by passage through activated carbon at 86 to 154 °F (20 to 66 °C) with contact time > 2 min. Only use lithium tetrahydroaluminate for drying THF if it is *peroxide-free* and *not* glossy wet. Distill only in presence of a reducing agent such as ferrous sulfate, since peroxide explosions have occurred.

Continue on next page

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Section 6. Health Hazard Data

Carcinogenicity: The IARC,[164] NTP,[169] and OSHA[164] do not list THF as a carcinogen. **Summary of Risks:** THF is a strong skin and mucous membrane irritant when present at levels > 20% but it is not a sensitizer. Effects in humans are not well known due to a lack of exposure data. CNS depression is seen in exposure to high concentrations. Liver and kidney damage occurred in animals but recent attempts to confirm these reports have failed. Thus, the liver and kidney damage has been attributed to impurities present in the THF used in older experiments. Even so, some authorities still recommend monitoring kidney and liver function in exposed persons. **Medical Conditions Aggravated by Long-Term Exposure:** Skin diseases. **Target Organs:** Eyes, CNS, skin, respiratory system. **Primary Entry Routes:** Inhalation, skin contact. **Acute Effects:** Vapor inhalation of high concentrations can cause slight smarting of the eyes or respiratory system as well as cough and chest pain. Inhalation of 25,000 ppm can cause anesthesia which may last 6 to 8 hr. Investigators testing pharmacological properties have reported severe occipital headache, nausea, and dizziness; these are easily reversible in fresh air. A marked decrease in WBC count was observed in researchers involved in experimental spinning of synthetic fibers (made from polyvinyl chloride with THF as a solvent). Recovery occurred after 2 years treatment with cystin, liver preparate, and vitamins B & C. Alcoholic beverages appear to enhance THF toxicity. **Chronic Effects:** Possible liver and kidney damage.

FIRST AID **Eyes:** *Do not* allow victim to rub or keep eyes tightly shut. Gently lift eyelids and flush immediately and continuously with flooding amounts of water until transported to an emergency medical facility. Consult a physician immediately. **Skin:** *Quickly* remove contaminated clothing. Rinse with flooding amounts of water for at least 15 min. Wash exposed area with soap and water. **Inhalation:** Remove exposed person to fresh air, support breathing and administer 100% humidified supplemental oxygen if needed. **Ingestion:** Never give anything by mouth to an unconscious or convulsing person. Contact a poison control center and unless otherwise advised, have that *conscious and alert* person drink 1 to 2 glasses of water to dilute. Gastric lavage is indicated if performed soon after ingestion or in patients at risk of convulsing.

Note to Physicians: Even though THF's effect on the liver and kidneys is uncertain, it is suggested that renal and hepatic function be monitored, especially AST, ALT, and GGT. If gastric lavage is performed protect airway by placement in Trendelenburg and left lateral decubitus position or by cuffed endotracheal intubation.

Section 7. Spill, Leak, and Disposal Procedures

Spill/Leak: Notify safety personnel, isolate and ventilate area, deny entry, and stay upwind. Shut off all ignition sources. Cleanup personnel should protect against vapor inhalation and skin/eye contact. Use water spray to reduce vapor and form nonflammable mixtures. Take up small spills with earth, sand, vermiculite, or other absorbent, noncombustible material and place in suitable containers. Dike far ahead of large spills for later reclamation or disposal. Report any release in excess of 1000 lb. Follow applicable OSHA regulations (29 CFR 1910.120). **Ecotoxicity Values:** Blue-green algae, growth inhibition microcyctis = 225 mg/L(pH 7); Protozoa, cell multiplication inhibition test = 858 mg/L. **Environmental Degradation:** In air, THF photodegrades by reaction with hydroxyl radicals with an estimated half-life of hrs to a few days. It is soluble and expected to wash out in rain. In water, its fate is uncertain. Based on very limited evidence THF is expected to biodegrade and not absorb to sediment. Tests in distilled water showed THF to last as follows: 0.5 mg/L for 1 to 2 days, 5 mg/L for 6 to 8 days, and 10 mg/L for 10 days. **Disposal:** A good candidate for rotary kiln incineration at 1508 to 2912 °F (820 to 1600 °C), for liquid injection incineration at 1202 to 2912 °F (650 to 1600 °C), and fluidized bed incineration at 842 to 1796 °F (450 to 980 °C). Contact your supplier or a licensed contractor for detailed recommendations. Follow applicable Federal, state, and local regulations.

EPA Designations
Listed as a RCRA Hazardous Waste (40 CFR 261.33): No. U213
SARA Extremely Hazardous Substance (40 CFR 355), TPQ: Not listed
SARA Toxic Chemical (40 CFR 372.65): Not listed
Listed as a CERCLA Hazardous Substance* (40 CFR 302.4): Final Reportable Quantity (RQ), 1000 lb (454 kg) [* per CWA, Sec. 311 (b)(4)]

OSHA Designations
Listed as an Air Contaminant (29 CFR 1910.1000, Table Z-1-A)

Section 8. Special Protection Data

Goggles: Wear protective eyeglasses, chemical safety goggles, or faceshields per OSHA eye- and face-protection regulations (29 CFR 1910.133). Because contact lens use in industry is controversial, establish your own policy. **Respirator:** Seek professional advice prior to respirator selection and use. Follow OSHA respirator regulations (29 CFR 1910.134) and, if necessary, wear a MSHA/NIOSH-approved respirator. For <1000 ppm, use any powered air-purifying respirator with organic vapor cartridge. For < 5000 ppm, use any supplied-air respirator (SAR) operated in continuous flow mode. For < 10,000 ppm, use any SAR or SCBA with a full facepiece. For < 20,000 ppm, use any SAR operated in pressure demand or positive pressure mode. For emergency or nonroutine operations (cleaning spills, reactor vessels, or storage tanks), wear an SCBA. *Warning! Air-purifying respirators do not protect workers in oxygen-deficient atmospheres.* If respirators are used, OSHA requires a written respiratory protection program that includes at least: medical certification, training, fit-testing, periodic environmental monitoring, maintenance, inspection, cleaning, and convenient, sanitary storage areas. **Other:** Wear chemically protective gloves, boots, aprons, and gauntlets made of butyl rubber or neoprene to prevent skin contact. **Ventilation:** Provide general and local exhaust ventilation systems to maintain airborne concentrations below the OSHA PELs (Sec. 2). Local exhaust ventilation is preferred because it prevents contaminant dispersion into the work area by controlling it at its source.[103] **Safety Stations:** Make available in the work area emergency eyewash stations, safety/quick-drench showers, and washing facilities. **Contaminated Equipment:** Separate contaminated work clothes from street clothes and launder before reuse. Remove this material from your shoes and clean PPE. **Comments:** Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, using the toilet, or applying cosmetics.

Section 9. Special Precautions and Comments

Storage Requirements: Store in dark glass bottles or steel drums in a cool, dry, well-ventilated area away from heat, oxidizing materials and sunlight. Outside or detached storage is preferred; if inside, keep in a standard flammable liquids storage room or cabinet. Use Class 1, Group C electrical equipment. Regularly check inhibitor levels to maintain peroxide level below 1%. Before use, test for absence of peroxides with potassium iodide-starch paper. Electrically ground and bond all equipment used with THF. In addition, provide jumpers at swing joints and other necessary locations to give a ground circuit of low resistance. Restabilize and store THF that has been recovered for reuse under a blanket of dry nitrogen gas. **Engineering Controls:** To reduce potential health hazards, use sufficient dilution or local exhaust ventilation to control airborne contaminants and to maintain concentrations at the lowest practical level. **Administrative Controls:** Consider preplacement and periodic medical exams of exposed workers with emphasis on the skin, eyes, CNS, and respiratory system.

Transportation Data (49 CFR 172.101)

DOT Shipping Name: Tetrahydrofuran
DOT Hazard Class: 3
ID No.: UN2056
DOT Packing Group: II
DOT Label: Flammable Liquid
Special Provisions (172.102): T8

Packaging Authorizations
a) Exceptions: None
b) Non-bulk Packaging: 173.202
c) Bulk Packaging: 173.242

Quantity Limitations
a) Passenger Aircraft or Railcar: 5 L
b) Cargo Aircraft Only: 60 L

Vessel Stowage Requirements
a) Vessel Stowage: B
b) Other: --

MSDS Collection **References:** 1, 73, 89, 100, 101, 103, 124, 126, 127, 132, 139, 148, 149, 153, 159, 162, 163, 164, 167, 168, 171
Prepared by: M Gannon, BA; **Industrial Hygiene Review:** D Wilson, CIH; **Medical Review:** AC Darlington, MPH, MD

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Anco Products Inc.
2500 South 17th Street
Elkhart, Indiana

1999 Groundwater Sampling and Analysis

As Prepared November 10, 1999 By:
Industrial Safety and Environmental Services (ISES)
716 Lincoln Way West
Osceola, Indiana 46561

ISES
Industrial Safety and Environmental Services

"We put you in compliance"

30723 Old US 20 West, Elkhart, IN 46517, P.O. Box 233, Osceola, IN 46561
Phone (219) 674-8357 • Fax (219) 674-6166 • ISES@I-S-E-S.com

November 10, 1999

Ray Plagens
Anco Products, Inc.
2500 South 17th Street
Elkhart, Indiana 46517

Dear Ray:

Enclosed you will find laboratory reports covering the October 1999 annual monitoring well sampling at Anco. The project was performed per your request submitted to Tris Gour, Randy Martin, and myself at our office on October 20, 1999.

The sample results have changed significantly since the last sampling event in 1995. Generally concentrations of Trichloroethene (TCE) still exceed the federal drinking water limit in MWs 1,2,and 4, but concentrations for 1,1,1 Trichloroethane (TCA) have reduced to levels below laboratory detection limits (non-detect) in all four wells. This appears to indicate that the plume has moved such that Anco is now in the plume "tail" as it moves offsite.

ISES was unable to recalculate ground water gradient and direction since our records indicate a change in top of well casing (TOC) elevation has occurred due to the casing repairs performed on MW-1 and there are no available records to indicate an updated TOC elevation survey has occurred. ISES would be pleased to provide this service once the well repairs are completed.

Thank you for the opportunity to service your environmental consulting requirements. If you have any questions or concerns about this years results or the monitoring wells in general please call.

Truly Yours,

Alan G. Esko

Alan G. Esko
Environmental Consultant
Industrial Safety and Environmental Services

Enclosures: 1as

Compliance File: Environmental / Groundwater / 1999

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Executive Summary

The levels of contamination in the recent samples have changed significantly to those from the previous sampling event in 1995. Generally concentrations of Trichloroethene (TCE) still exceed the federal drinking water Maximum Contaminant Levels (MCLs) in MWs 1,2,and 4, but concentrations for 1,1,1 Trichloroethane (TCA) have reduced to levels below laboratory detection limits (non-detect) in all four wells. The concentration of TCE has also reduced below the laboratory detection limit in MW-3. This appears to indicate that the plume has moved such that Anco is now in the plume "tail" as it moves offsite. This professional opinion cannot, however, be proven ground water gradient and direction calculations cannot be verified from the recent water level measurements.

The groundwater contamination is still above federal drinking water MCLs, yet below the Voluntary Remediation Program (VRP) Tier II Non-Residential and the proposed Risk Interagated System of Cleanups (RISC) Tier I Default cleanup objectives. The contamination does not appear to be an environmental detriment to the value of the property. The discontinuing of annual monitoring should be considered if API is not receiving groundwater as a potable resource and the monitoring is voluntary.

MW-1 was observed to be unsecure, requiring well protection repairs. Repairs details recommendations are to be found in the body of this text.

I. Introduction

This report was generated by Industrial Safety and Environmental Services (ISES), Elkhart, Indiana, for Anco Products Inc. (Anco), Elkhart, Indiana. Annual sampling of the monitoring wells was recommended to, and authorized by Ray Plagens.

This report details the results from the sampling of groundwater performed on October 28, 1999.

II. Monitoring Well Conditions

All four wells were inspected prior to sampling and measurement. The condition of each well was assessed to ascertain whether repair was required.

The monitoring wells (MWs) 2,3 and 4 appeared to be in good working order. MW-1 was unsecure since it did not have a well cap or a protective cover attached to the well casing. MW-1 repair to reinstall a protective flush mount cover and locking well cap is required. MWs 2,3, and 4 had locks but client supplied keys would not work for MWs 3 and 4, therefore ISES needed to gain access by cutting off those MW's locks. ISES recomends three new "keyed-alike" locks be installed on the previously referenced MWs. ISES recommends to have these repairs performed as soon as possible to prevent tampering and vandalism. The above referenced verbal observations were given to Ray Plagens before ISES departed the site on the day of the sampling event.

III. Measurement of Static Water Levels

The static water level in the wells was measured before the wells were purged. The measurements were performed using an electronic water level indicator with markings for tenths and hundredths of a foot. Due to the previous well casing repairs to MW-1, ISES is unable to determine water level elevations from MW-1 unless the top of casing (TOC) is re-surveyed. Without accurate TOC well elevations, a ground water table directional map can not be created.

Table 1

October 1999 Water Table Level Measurements				
MW	**Well Depth**	**TOC Elevation**	**Depth to Groundwater**	**Water Table Elevations**
1	23.35	97.03	14.20'	Not Available
2	25.6	100	17.26'	82.74'
3	25.4	101.26	17.73'	83.53'
4	25.6	100.53	16.69'	83.84'

All distances in feet

IV. Groundwater Sampling

The wells were purged before sampling. Purging of the wells was performed using disposable polyethylene bailers. Three to five well casing volumes of groundwater were purged prior to sampling.

The collected purge water from the the wells was disposed on-site, near each particular MW.

Each sample was collected in two (2) forty milliliter (40 ml) laboratory supplied prepreseved vials. The samples were labeled with the project name, sample identification, date and time of sampling, and sampler initials.

Immediately after sample collection, the samples were placed in an insulated cooler containing ice to maintain the required temperature. The samples were shipped "priority overnight" to Test America, Inc. laboratories, Indianapolis, IN on the day of sampling.

V. Laboratory Analysis and Results

Volatile Organic Compound (VOC) analysis was performed in accordance to EPA Method 8260, by Test America, Inc.

A historic summary of the analytical results, from 1995 to present, is presented in **Table 3.** A copy of the recent laboratory reports and chain of custody documentation is located in **Appendix I.**

Table 3

WELL	1995		1996		1999	
	TCA	TCE	TCA	TCE	TCA	TCE
MW #1	ND	25.4	ND	26.9	ND	37.0
MW #2	ND	22.9	ND	17.7	ND	12.0
MW #3	3.17	5.16	2.20	4.30	ND	ND
MW #4	2.36	6.56	1.50	6.80	ND	6.7
Drinking Water MCL	200	5	200	5	200	5

All levels in micrograms per liter (ug/l) which is equivalent to parts per billion (ppb)
MW Monitoring Well
TCA 1,1,1 Trichloroethane
TCE Trichloroethene

VI. Conclusions and Recommendations

The levels of contamination in the recent samples have changed significantly to those from the previous sampling event in 1995. Generally concentrations of Trichloroethene (TCE) still exceed the federal drinking water Maximum Contaminant Levels (MCLs) in MWs 1,2,and 4, but concentrations for 1,1,1 Trichloroethane (TCA) have reduced to levels below laboratory detection limits (non-detect) in all four wells. The concentration of TCE has also reduced below the laboratory detection limit in MW-3. This appears to indicate that the plume has moved such that Anco is now in the plume "tail" as it moves offsite. This professional opinion cannot, however, be proven ground water gradient and direction calculations cannot be verified from the recent water level measurements.

The groundwater contamination is still above federal drinking water MCLs, yet below the Voluntary Remediation Program (VRP) Tier II Non-Residential and the proposed Risk Interagated System of Cleanups (RISC) Tier I Default cleanup objectives. The contamination does not appear to be an environmental detriment to the value of the property. The discontinuing of annual monitoring should be considered if API is not receiving groundwater as a potable resource and the monitoring is voluntary.

MW-1 was observed to be unsecure, requiring well protection repairs.
Repairs details recommendations are to be found in the body of this text.

VII. Limitations of Assessment

This assessment was performed in a manner consistent with standards typically applied to a basic statement of professional opinion. The assessment is based partially on information obtained from others and Industrial Safety and Environmental Services makes no representation or warranty concerning the accuracy or completeness of this analysis.

Some information, recommendations, and suggestions contained within this report may be subject to interpretation and differing conclusions are possible. The information contained in this report was developed from information available at the time the report was compiled. Industrial Safety and Environmental Services does not assume liability for financial or other losses or subsequent damage caused by or related to any use of this document.

VIII. Signatorial

Industrial Safety and Environmental Safety was glad to perform this action for Anco Products Incorporated. If you have any questions or concerns regarding this issue, please feel free to contact our office at your convenience.

Sincerely,

Alan G. Esko

Alan G. Esko
Environmental Consultant
Industrial Safety and Environmental Services

November 10, 1999

IX. Appendices

TestAmerica
INCORPORATED

ANALYTICAL REPORT

Mr. Alan Esko
INDUSTRIAL SAFETY AND
ENVIRONMENTAL
30723 Old US Highway 20
Elkhart, IN 46514

11/03/1999

Job Number: 99.06259

Enclosed are the Analytical Results for the following samples submitted to TestAmerica, Inc. Indianapolis Division for analysis:

Project Description: API ANNUAL SAMPLING - ELKHART

Sample Number	Sample Description	Date Taken	Date Received
251593	MW-1	10/28/1999	10/29/1999
251594	MW-2	10/28/1999	10/29/1999
251595	MW-3	10/28/1999	10/29/1999
251596	MW-4	10/28/1999	10/29/1999

TestAmerica, Inc. certifies that the analytical results contained herein apply only to the specific samples analyzed.

Reproduction of this analytical report is permitted only in its entirety.

Project Representative

6964 HILLSDALE CT. / INDIANAPOLIS, IN 46250 / 317-842-4261 / FAX: 317-842-4286

TestAmerica
INCORPORATED

ANALYTICAL REPORT

Mr. Alan Esko
INDUSTRIAL SAFETY AND
ENVIRONMENTAL
30723 Old US Highway 20
Elkhart, IN 46514

11/03/1999

Job No.: 99.06259

Date Received: 10/29/1999
Job Description: API ANNUAL SAMPLING - ELKHART

Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251593 MW-1			10/28/1999			
VOLATILES-8260 (AQ)				/		
Acetone	<50		ug/L	aka / 11/02/1999	SW 8260B	<50
Acrolein	<250		ug/L	aka / 11/02/1999	SW 8260B	<250
Acrylonitrile	<250		ug/L	aka / 11/02/1999	SW 8260B	<250
Benzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Bromobenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Bromochloromethane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Bromodichloromethane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Bromoform	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Bromomethane	<10.		ug/L	aka / 11/02/1999	SW 8260B	<10.
n-Butylbenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
sec-Butylbenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
tert-Butylbenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Carbon disulfide	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Carbon tetrachloride	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Chlorobenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Chlorodibromomethane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Chloroethane	<10.		ug/L	aka / 11/02/1999	SW 8260B	<10.
Chloroform	<20		ug/L	aka / 11/02/1999	SW 8260B	<20
Chloromethane	<10.		ug/L	aka / 11/02/1999	SW 8260B	<10.
2-Chlorotoluene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
4-Chlorotoluene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
2-Chloroethyl vinyl ether	<50.		ug/L	aka / 11/02/1999	SW 8260B	<50.
1,2-Dibromo-3-chloropropane	<50.		ug/L	aka / 11/02/1999	SW 8260B	<50.

TestAmerica
INCORPORATED

ANALYTICAL REPORT

Mr. Alan Esko
INDUSTRIAL SAFETY AND
ENVIRONMENTAL
30723 Old US Highway 20
Elkhart, IN 46514

11/03/1999

Job No.: 99.06259

Date Received: 10/29/1999
Job Description: API ANNUAL SAMPLING - ELKHART

Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251593 MW-1			10/28/1999			
1,2-Dibromoethane(EDB)	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Dibromomethane	<10.		ug/L	aka / 11/02/1999	SW 8260B	<10.
1,2-Dichlorobenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,3-Dichlorobenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,4-Dichlorobenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Dichlorodifluoromethane	<10		ug/L	aka / 11/02/1999	SW 8260B	<10
trans-1,4-Dichloro-2-butene	<50		ug/L	aka / 11/02/1999	SW 8260B	<50
1,1-Dichloroethane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,2-Dichloroethane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,1-Dichloroethene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
cis-1,2-Dichloroethene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
trans-1,2-Dichloroethene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,2-Dichloropropane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,3-Dichloropropane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
2,2-Dichloropropane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,1-Dichloropropene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
cis-1,3-Dichloropropene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
trans-1,3-Dichloropropene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Ethylbenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Ethyl methacrylate	<10.		ug/L	aka / 11/02/1999	SW 8260B	<10.
2-Hexanone	<50.		ug/L	aka / 11/02/1999	SW 8260B	<50.
Hexachlorobutadiene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Iodomethane	<10.		ug/L	aka / 11/02/1999	SW 8260B	<10.
Isopropylbenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0

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Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251593 MW-1			10/28/1999			
p-Isopropyltoluene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Methylene chloride	<10.		ug/L	aka / 11/02/1999	SW 8260B	<10.
Methyl-ethyl-ketone (MEK)	<50.		ug/L	aka / 11/02/1999	SW 8260B	<50.
Methyl-tert-butyl ether (MTBE)	<10.		ug/L	aka / 11/02/1999	SW 8260B	<10.
4-Methyl-2-pentanone (MIBK)	<50.		ug/L	aka / 11/02/1999	SW 8260B	<50.
Naphthalene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
n-Propylbenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Styrene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,1,1,2-Tetrachloroethane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,1,2,2-Tetrachloroethane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Tetrachloroethene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Toluene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,2,3-Trichlorobenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,2,4-Trichlorobenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,1,1-Trichloroethane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,1,2-Trichloroethane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Trichloroethene	37.		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Trichlorofluoromethane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,2,3-Trichloropropane	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,2,4-Trimethylbenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
1,3,5-Trimethylbenzene	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Vinyl acetate	<10.		ug/L	aka / 11/02/1999	SW 8260B	<10.
Vinyl chloride	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0
Xylenes, (Total)	<5.0		ug/L	aka / 11/02/1999	SW 8260B	<5.0

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Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251593 MW-1			10/28/1999			
SURR: Toluene-d8	95		75-132%	aka / 11/02/1999	SW 8260B	
SURR: Dibromofluoromethane	96		91-114%	aka / 11/02/1999	SW 8260B	
SURR: 4-Bromofluorobenzene	97		87-132%	aka / 11/02/1999	SW 8260B	

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Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251594 MW-2			10/28/1999			
VOLATILES-8260 (AQ)				/		
Acetone	<50		ug/L	aka / 10/30/1999	SW 8260B	<50
Acrolein	<250		ug/L	aka / 10/30/1999	SW 8260B	<250
Acrylonitrile	<250		ug/L	aka / 10/30/1999	SW 8260B	<250
Benzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromochloromethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromodichloromethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromoform	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromomethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
n-Butylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
sec-Butylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
tert-Butylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Carbon disulfide	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Carbon tetrachloride	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Chlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Chlorodibromomethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Chloroethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Chloroform	<20		ug/L	aka / 10/30/1999	SW 8260B	<20
Chloromethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
2-Chlorotoluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
4-Chlorotoluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
2-Chloroethyl vinyl ether	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
1,2-Dibromo-3-chloropropane	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.

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Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251594 MW-2			10/28/1999			
1,2-Dibromoethane(EDB)	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Dibromomethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
1,2-Dichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,3-Dichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,4-Dichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Dichlorodifluoromethane	<10		ug/L	aka / 10/30/1999	SW 8260B	<10
trans-1,4-Dichloro-2-butene	<50		ug/L	aka / 10/30/1999	SW 8260B	<50
1,1-Dichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2-Dichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1-Dichloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
cis-1,2-Dichloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
trans-1,2-Dichloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2-Dichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,3-Dichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
2,2-Dichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1-Dichloropropene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
cis-1,3-Dichloropropene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
trans-1,3-Dichloropropene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Ethylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Ethyl methacrylate	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
2-Hexanone	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
Hexachlorobutadiene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Iodomethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Isopropylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0

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251594 MW-2			10/28/1999			
p-Isopropyltoluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Methylene chloride	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Methyl-ethyl-ketone (MEK)	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
Methyl-tert-butyl ether (MTBE)	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
4-Methyl-2-pentanone (MIBK)	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
Naphthalene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
n-Propylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Styrene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,1,2-Tetrachloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,2,2-Tetrachloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Tetrachloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Toluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,3-Trichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,4-Trichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,1-Trichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,2-Trichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Trichloroethene	12.		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Trichlorofluoromethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,3-Trichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,4-Trimethylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,3,5-Trimethylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Vinyl acetate	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Vinyl chloride	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Xylenes, (Total)	<5.0		ug/L	aka / 10/29/1999	SW 8260B	<5.0

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Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251594 MW-2			10/28/1999			
SURR: Toluene-d8	98		75-132%	aka / 10/30/1999	SW 8260B	
SURR: Dibromofluoromethane	106.		91-114%	aka / 10/30/1999	SW 8260B	
SURR: 4-Bromofluorobenzene	95		87-132%	aka / 10/30/1999	SW 8260B	

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Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251595 MW-3			10/28/1999			
VOLATILES-8260 (AQ)				/		
Acetone	<50		ug/L	aka / 10/30/1999	SW 8260B	<50
Acrolein	<250		ug/L	aka / 10/30/1999	SW 8260B	<250
Acrylonitrile	<250		ug/L	aka / 10/30/1999	SW 8260B	<250
Benzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromochloromethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromodichloromethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromoform	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromomethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
n-Butylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
sec-Butylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
tert-Butylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Carbon disulfide	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Carbon tetrachloride	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Chlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Chlorodibromomethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Chloroethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Chloroform	<20		ug/L	aka / 10/30/1999	SW 8260B	<20
Chloromethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
2-Chlorotoluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
4-Chlorotoluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
2-Chloroethyl vinyl ether	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
1,2-Dibromo-3-chloropropane	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.

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251595 MW-3			10/28/1999			
1,2-Dibromoethane(EDB)	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Dibromomethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
1,2-Dichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,3-Dichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,4-Dichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Dichlorodifluoromethane	<10		ug/L	aka / 10/30/1999	SW 8260B	<10
trans-1,4-Dichloro-2-butene	<50		ug/L	aka / 10/30/1999	SW 8260B	<50
1,1-Dichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2-Dichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1-Dichloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
cis-1,2-Dichloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
trans-1,2-Dichloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2-Dichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,3-Dichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
2,2-Dichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1-Dichloropropene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
cis-1,3-Dichloropropene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
trans-1,3-Dichloropropene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Ethylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Ethyl methacrylate	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
2-Hexanone	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
Hexachlorobutadiene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Iodomethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Isopropylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0

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251595 MW-3			10/28/1999			
p-Isopropyltoluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Methylene chloride	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Methyl-ethyl-ketone (MEK)	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
Methyl-tert-butyl ether (MTBE)	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
4-Methyl-2-pentanone (MIBK)	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
Naphthalene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
n-Propylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Styrene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,1,2-Tetrachloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,2,2-Tetrachloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Tetrachloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Toluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,3-Trichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,4-Trichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,1-Trichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,2-Trichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Trichloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Trichlorofluoromethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,3-Trichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,4-Trimethylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,3,5-Trimethylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Vinyl acetate	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Vinyl chloride	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Xylenes, (Total)	<5.0		ug/L	aka / 10/29/1999	SW 8260B	<5.0

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ANALYTICAL REPORT

Mr. Alan Esko
INDUSTRIAL SAFETY AND
ENVIRONMENTAL
30723 Old US Highway 20
Elkhart, IN 46514

11/03/1999

Job No.: 99.06259

Date Received: 10/29/1999
Job Description: API ANNUAL SAMPLING - ELKHART

Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251595 MW-3			10/28/1999			
SURR: Toluene-d8	94		75-132%	aka / 10/30/1999	SW 8260B	
SURR: Dibromofluoromethane	106.		91-114%	aka / 10/30/1999	SW 8260B	
SURR: 4-Bromofluorobenzene	98		87-132%	aka / 10/30/1999	SW 8260B	

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11/03/1999

Job No.: 99.06259

Date Received: 10/29/1999
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Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251596 MW-4			10/28/1999			
VOLATILES-8260 (AQ)				/		
Acetone	<50		ug/L	aka / 10/30/1999	SW 8260B	<50
Acrolein	<250		ug/L	aka / 10/30/1999	SW 8260B	<250
Acrylonitrile	<250		ug/L	aka / 10/30/1999	SW 8260B	<250
Benzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromochloromethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromodichloromethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromoform	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Bromomethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
n-Butylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
sec-Butylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
tert-Butylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Carbon disulfide	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Carbon tetrachloride	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Chlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Chlorodibromomethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Chloroethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Chloroform	<20		ug/L	aka / 10/30/1999	SW 8260B	<20
Chloromethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
2-Chlorotoluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
4-Chlorotoluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
2-Chloroethyl vinyl ether	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
1,2-Dibromo-3-chloropropane	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.

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11/03/1999

Job No.: 99.06259

Date Received: 10/29/1999
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Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251596 MW-4			10/28/1999			
1,2-Dibromoethane(EDB)	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Dibromomethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
1,2-Dichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,3-Dichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,4-Dichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Dichlorodifluoromethane	<10		ug/L	aka / 10/30/1999	SW 8260B	<10
trans-1,4-Dichloro-2-butene	<50		ug/L	aka / 10/30/1999	SW 8260B	<50
1,1-Dichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2-Dichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1-Dichloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
cis-1,2-Dichloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
trans-1,2-Dichloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2-Dichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,3-Dichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
2,2-Dichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1-Dichloropropene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
cis-1,3-Dichloropropene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
trans-1,3-Dichloropropene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Ethylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Ethyl methacrylate	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
2-Hexanone	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
Hexachlorobutadiene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Iodomethane	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Isopropylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0

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11/03/1999

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Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251596 MW-4			10/28/1999			
p-Isopropyltoluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Methylene chloride	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Methyl-ethyl-ketone (MEK)	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
Methyl-tert-butyl ether (MTBE)	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
4-Methyl-2-pentanone (MIBK)	<50.		ug/L	aka / 10/30/1999	SW 8260B	<50.
Naphthalene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
n-Propylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Styrene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,1,2-Tetrachloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,2,2-Tetrachloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Tetrachloroethene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Toluene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,3-Trichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,4-Trichlorobenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,1-Trichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,1,2-Trichloroethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Trichloroethene	6.7		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Trichlorofluoromethane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,3-Trichloropropane	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,2,4-Trimethylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
1,3,5-Trimethylbenzene	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Vinyl acetate	<10.		ug/L	aka / 10/30/1999	SW 8260B	<10.
Vinyl chloride	<5.0		ug/L	aka / 10/30/1999	SW 8260B	<5.0
Xylenes, (Total)	<5.0		ug/L	aka / 10/29/1999	SW 8260B	<5.0

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Sample Number / Sample I.D. Parameters	Result	Flag	Sample Date/ Units	Analyst & Date Analyzed	Method	Reporting Limit
251596 MW-4			10/28/1999			
SURR: Toluene-d8	94		75-132%	aka / 10/30/1999	SW 8260B	
SURR: Dibromofluoromethane	101.		91-114%	aka / 10/30/1999	SW 8260B	
SURR: 4-Bromofluorobenzene	97		87-132%	aka / 10/30/1999	SW 8260B	

KEY TO ABBREVIATIONS

<	Less than; when appearing in the result column, indicates analyte not detected at or above the Reporting Limit.
%	Percent; To convert ppm to %, divide result by 10,000. To convert % to ppm, multiply the result by 10,000.
*	Indicates the Reporting Limit is elevated due to insufficient sample volume.
mg/L	Part per million; Concentration in units of milligrams of analyte per Liter of aqueous sample.
ug/L	Part per billion; Concentration in units of micrograms of analyte per Liter of aqueous sample.
mg/kg	Part per million; Concentration in units of milligrams of analyte per kilogram of non-aqueous sample.
ug/kg	Part per billion; Concentration in units of micrograms of analyte per kilogram of non-aqueous sample.
a	Indicates the sample concentration was quantitated using a diesel fuel standard.
b	Indicates the analyte of interest was also found in the method blank.
c	Sample resembles unknown Hydrocarbon.
dw	When indicated, the result is reported on a dry weight basis. The contribution of the moisture content in the sample has been subtracted when calculating the concentration.
d1	Indicates the analyte has elevated Reporting Limit due to high concentration.
d2	Indicates the analyte has elevated Reporting Limit due to matrix.
e	Indicates the reported concentration is estimated.
f	Indicates the sample concentration was quantitated using a fuel oil standard.
g	Indicates the sample concentration was quantitated using a gasoline standard.
h	Indicates the sample was analyzed past recommended holding time.
i	Insufficient spike concentration due to high analyte concentration in the sample.
j	Indicates the reported concentration is below the Reporting Limit.
k	Indicates the sample concentration was quantitated using a kerosene standard.
l	Indicates an MS/MSD was not analyzed due to insufficient sample. An LCS / LCS Duplicate provided for precision.
m	Indicates the sample concentration was quantitated using a mineral spirits standard.
o	Indicates the sample concentration was quantitated using a motor oil standard.
p	Indicates the sample was post spiked due to sample matrix.
q	Indicates MS/MSD exceeded control limits. All other Quality Control Indicators were in control.
r	Indicates the sample was received past recommended holding time.
s	Indicates the sample concentration was quantitated using a stoddard solvent standard.
u	Indicates the sample was received improperly preserved and/or imporperly contained.
uj	Indicates the result is below the Reporting Limit and is considered estimated.

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CHAIN OF CUSTODY RECORD

COMPANY ISES
ADDRESS 30723 Old U.S. Hwy 20, Elkhart, IN 46514
PHONE 219-674-8357 FAX 219-674-6166
PROJECT NAME/LOCATION API Annual Sampling - Elkhart
PROJECT NUMBER
PROJECT MANAGER Alan Esko

REPORT TO: Alan Esko
INVOICE TO: Same
P.O. NO.
QUOTE NO.

SAMPLED BY
Alan G. Esko (PRINT NAME) — Alan G. Esko (SIGNATURE)
Kevin Perkins (PRINT NAME) — Kevin Perkins (SIGNATURE)

ANALYSES

To assist us in selecting the proper method

Is this work being conducted for regulatory compliance monitoring? Yes ___ No X

Is this work being conducted for regulatory enforcement action? Yes ___ No X

Which regulations apply: RCRA ___ NPDES Wastewater ___ UST ___ Drinking Water ___ Other ___ None X

DATE	TIME	SAMPLE ID/DESCRIPTION	MATRIX	GRAB	COMP	# and Type of Containers: HCl	NaOH	HNO_3	H_2SO_4	OTHER	VOCs (8260)	COMMENTS
10/28/99	1330	MW-1	W	X		2					X	
	1400	MW-2										
	1500	MW-3										
	515	MW-4										

CONDITION OF SAMPLE: BOTTLES INTACT? YES / NO — FIELD FILTERED? ~~YES / NO~~ — COC SEALS PRESENT AND INTACT? ~~YES / NO~~ — VOLATILES FREE OF HEADSPACE? YES / NO — TEMPERATURE UPON RECEIPT: 5.8 C — Bottles supplied by LAB? YES / NO

SAMPLE REMAINDER DISPOSAL: RETURN SAMPLE REMAINDER TO CLIENT VIA ___ I REQUEST LAB TO DISPOSE OF ALL SAMPLE REMAINDERS A. Esko DATE 10-28-99

RELINQUISHED BY:	DATE	TIME	RECEIVED BY:	RELINQUISHED BY:	DATE	TIME	RECEIVED FOR LAB BY:
Alan G. Esko	10/28/99		Common Carrier		10/28	830	[illegible]

METHOD OF SHIPMENT: Fed Ex

REMARKS:

PT 1 - ORIGINAL - WHITE PT 2 - PROJECT MANAGER - YELLOW PT 3 - CUSTOMER COPY - PINK