RE: Spinnaker Coatings, LLC ("New Spinnaker")/Second Follow-Up Request/East Troy Aquifer

Kolak, Shari

Tue 9/10/2019 3:45 PM

To: Hoffman, Timothy <tim.hoffman@dinsmore.com>
Cc: Stuart.Postle@spinps.com <Stuart.Postle@spinps.com>; Louis Guzzetti Jr. <louguzzetti@msn.com>

Mr. Hoffman,

Thank you for your response. Shari

From: Hoffman, Timothy <tim.hoffman@dinsmore.com>
Sent: Tuesday, September 10, 2019 2:49 PM
To: Kolak, Shari <kolak.shari@epa.gov>
Cc: Stuart.Postle@spinps.com; Louis Guzzetti Jr. <louguzzetti@msn.com>
Subject: Spinnaker Coatings, LLC ("New Spinnaker")/Second Follow-Up Request/East Troy Aquifer

Hello Ms. Kolak.

I am responding to the USEPA's September 5, 2019 Second Follow-up Request to New Spinnaker. Attached please find the Phase 1 Environmental Site Assessment from 2002. You will note when you read the report that all appropriate inquiry activity started shortly after the Asset Purchase Agreement was signed on January 18, 2002 (the ERM site visit was January 31 and February 1, 2002; also see appendices for other AAI activity dates). The Bankruptcy Court approved the sale on March 6, 2002. By the date of closing, March 28, 2002, the AAI had been completed and the report was then finalized (dated April 8,2002).

Please let me know if you need anything else. I would also like to request that USEPA acknowledge the BFPP status of New Spinnaker assuming it continues to meet its continuing obligations to maintain that.

Thank you.

Tim

Dinsmore

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ENVIRONMENTAL RESOURCES MANAGEMENT

FINAL REPORT

Paul, Weiss, Rifkind, Wharton & Garrison

Phase I Environmental Site Assessment and Limited Compliance Review

Spinnaker Coating

Troy, Ohio

8 April 2002

HR501.00.01

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EXECUTIVE SUMMARY

Environmental Resources Management, Inc. (ERM) completed a Phase I Environmental Assessment and Limited Compliance Review of the Spinnaker Coating facilities located at 518 E. Water Street (Plant No 1) and 130 Mary Bill Drive (Plant No. 2). Both facilities are located in Troy, Ohio.

The facilities produce pressure, moisture and heat sensitive adhesive papers for postage stamps, labels and other applications. Operations include coating of rolled paper stock with water, acrylic, rubber or solvent-based (no longer used) adhesives, as well as "hot-melt" glues. Slitting was conducted on site until recently. Because of customer demands and a desire to improve response time, slitting operations are now, for the most part, out-sourced. Solvent-based adhesive-coated paper is still marketed by Spinnaker, but produced by IVEX Coating, Inc.

Plant No. 1 has applied for a Title V air operating permit, even though emissions are now well below Title V thresholds, due to the mothballing of the solvent-based coating lines. Principal raw materials at both facilities consist of rolled paper stock and raw materials used in the formulations of the water-based glues and adhesives.

Plant No. 1 consists of approximately 275,000-square feet of building space on an approximately 5-acre property. Plant No. 1 also includes a small outparcel located between two adjacent residences to the west. Approximately 75 percent of the building houses manufacturing operations, with the remainder used for warehousing and offices. Spinnaker has operated at Plant No. 1 since 1994.

Plant No. 2 consists of approximately 100,000-square feet of building space on an approximately 5-acre property, and also includes an adjacent 5-acre lot located immediately north of the facility. Approximately 50 percent of the building houses manufacturing operations, with the remainder used for warehousing and offices. Spinnaker also has operated at Plant No. 2 since 1994

ERM identified potential material findings (i.e., potentially > $10,000) that are summarized below and are discussed in greater detail in the body of the report.

PLANT NO. 1 (518 E. WATER STREET)

Ongoing Remediation/ Ohio EPA Enforcement

In October 1993, subsurface investigations conducted in preparation for a potential property transaction were conducted in two phases at the subject property. Soil borings were drilled, and groundwater monitoring wells were installed to facilitate collection of soil and groundwater samples. The investigations identified contamination of soil and groundwater on the west end of the subject property, related to suspected releases from the former non-hazardous waste storage area (trichloroethene), former underground reclaimed toluene line (toluene), and former 10,000-gallon and/or 30,000-gallon fuel oil aboveground storage tanks (ASTs) (fuel-related impacts). As such, the contaminants that were detected at levels of concern included volatile organic compounds (VOCs) (primarily toluene, TCE and its related breakdown products) and polynuclear aromatic hydrocarbons (PAHs). Free product was identified in soil and groundwater, suspected to be related to a release of fuel oil.

On the east end of the subject property, soil and groundwater impacts related to releases of toluene from the former 3,000-gallon toluene underground storage tank and the "aeration tanks". The primary contaminant of concern was toluene.

In 1994, Kimberly-Clark reported the contamination to the Ohio EPA, and discussed the options for remediating the subject property. The Ohio EPA, based on limited staff availability, recommended that the work proceed voluntarily.

Kimberly-Clark estimated the remedial costs for both areas to be approximately $1,300,000. In the asset purchase agreement between Kimberly-Clark and Spinnaker, Kimberly-Clark retained liability up to $2,000,000 to complete the remediation, with several exceptions that capped the total liability not-to-exceed $3,000,000. The purchase agreement was executed in June 1994 and the transaction was closed in September 1994.

Kimberly-Clark conducted remedial activities at the subject property in the Spring of 1995. The work included the removal of the aboveground storage tanks and hazardous and non-hazardous waste storage areas, excavation of contaminated soil, and the installation of two remediation systems.

The remediation system on the west end of the subject property consisted of a groundwater pump and treat system consisting of four groundwater recovery wells, oil/water separation and air stripping. Initially, treated effluent was discharged to the public sewer system. In 1997, an NPDES permit was obtained to discharge the treated effluent to the Great Miami River. The system began operation in August 1995, and has been in operation since that time, except for a period of 1 March 2001 into late March 2001. The average groundwater recovery rate for the system is 10 to 15 gallons per minute. Minimal free product was recovered, and the oil/water separation was by-passed beginning in June 1997. Significant progress has been made in reducing dissolved groundwater contaminant levels in this area of the subject property.

The remediation system on the east end was installed in 1995, consisting of soil vapor extraction (SVE) and air sparging. Five SVE wells and four sparging wells were installed. The system began operation in August 1995, and operated until February 1997. The remediation system in this portion of the subject property focused on remediating two primary sources of toluene impacts in soil and groundwater. The SVE/air sparging system was effective in reducing the levels of toluene to below the proposed cleanup levels. As such, Kimberly-Clark contends that the remediation was completed in this portion of the subject property.

Other VOCs, specifically tetrachloroethene (PCE), TCE and associated breakdown products, were present in the groundwater at concentrations of the US EPA Maximum Contaminant Levels for Drinking Water (MCLs); however, Kimberly-Clark contended that these contaminants were related to an off-site source of contamination. Therefore, the proposed cleanup levels for tetrachloroethene was proposed as "background", meaning the concentrations that were detected in upgradient monitoring wells located in the southwest and southeast portions of the subject property.

Enforcement by the Ohio EPA began in 1997, with the issuance of a proposed Director's Final Findings & Orders (DFF&O) to conduct an RI/FS at the subject property. Although the Ohio EPA eventually proposed only an Order containing only operation and maintenance (O&M) with continued monitoring, negotiation of the DFF&O stalled and the Order was never finalized.

In February 2001, Kimberly-Clark submitted a *Site Closure Report,* indicating that the remediation had been completed for both the west end and east end of the subject property. The Ohio EPA responded by issuing a DFF&O that ordered that the groundwater pump and treat system be re-started and that the effectiveness of the remediation system be evaluated,

and improved where necessary. In addition, the Ohio EPA established Interim Action Groundwater Compliance (IAGWC) standards, to be the MCL or calculated carcinogenic risk of 10^{-5} or non-cancer risk, whichever was lower, at a concentration not to be less than 1 microgram per Liter.

Kimberly-Clark re-started the groundwater pump and treat system, and prepared a Final Remediation Work Plan that involved the use of *in situ* oxidation to supplement the current remediation system. Representatives of the Ohio EPA, Kimberly-Clark and Spinnaker met at the subject property in June 2001 to discuss the proposed plan. The parties were not able to agree on an acceptable approach. As of the date of this report, no further remedial action, save the continued operation of the pump and treat system, has been conducted. Kimberly-Clark has appealed the matter to the Environmental Review Appeals Commission (ERAC).

There are continuing liabilities for this matter. The asset purchase agreement capped the liability for Kimberly-Clark at $2,000,000, with some exceptions that could bring the total to $3,000,000. Kimberly-Clark has notified Spinnaker that it is approaching or has approached the $2,000,000 cap. As such, Kimberly-Clark has attempted to place any future liability costs on Spinnaker.

Kimberly-Clark has attempted to make Spinnaker a party to the DFF&O and ongoing enforcement at the subject property. As of the date of this report, the ERAC has rejected this contention, and Spinnaker is not named in any of the enforcement proceedings.

Groundwater, and possibly soil (no current data available), impacts remain at the subject property in excess of the MCLs or IAGWC standards developed by the Ohio EPA. Depending on the legal outcome of these matters, Spinnaker or its successors could incur liability for the continued and/or supplemented remediation of the subject property. However, based on the review completed, there appears to be a remote likelihood that Spinnaker or its successors would incur such liability.

RCRA Corrective Action

In the March 2001 DFF&O, the Ohio EPA defined the VOCs, based on the quantity released, to be hazardous waste. As such, the Ohio EPA defined the subject property as a hazardous waste facility where hazardous waste has been treated, stored or disposed. Depending on the outcome of the enforcement and ERAC appeal, RCRA corrective action could be triggered as a mechanism to mandate cleanup of the subject property. However, based on the review completed, such action appears to be unlikely.

Contamination of City of Troy Well Field

Records indicate that VOCs have been detected in selected supply wells for the City of Troy on a periodic basis, specifically Well 18. The supply wells in question are located north of the Great Miami River, with Wells 14 and 18 being located about 900 feet and 1,200 feet east/northeast of the subject property, respectively.

The date of the first detection was not identified in the records reviewed. The contaminant of concern was primarily related to halogenated VOCs, specifically cis 1,2-dichloroethene (cis 1,2-DCE) in Well 18. The cis 1,2-DCE has been detected at relatively low concentrations (average of 0.7 micrograms per Liter [μg/L]), which is two orders of magnitude below the Maximum Contaminant Level for Drinking Water (MCL) of 70 μg/L.

In 1997 and 1999, the Ohio EPA conducted subsurface investigations in the vicinity of the well field, including the subject property. The work included collecting shallow and deeper groundwater samples to determine the potential source(s) of contamination identified in the well field. In regard to the subject property, the Ohio EPA sample results indicated the presence of VOCs on the subject property that were generally consistent with those identified by Kimberly-Clark. In general, contamination was not detected in the groundwater samples collected from deeper portions of the aquifer. The Ohio EPA has asserted that the subject property is a source of the contaminants, specifically the cis 1,2-DCE, detected in Well 18.

Kimberly-Clark and Spinnaker have constructed several technical arguments that attempt to refute this claim. In an effort to support their position, an aquifer-pumping test was conducted in July 1999. The pumping test indicated that the monitoring wells on the subject property did show influence from pumping of the City wells; however, the influence on pumping of the on-site supply wells was much greater (five times). Sampling and analysis results have not detected VOCs in the on-site supply wells.

There may be potential liability in regard to the contamination of the City of Troy supply wells. The Ohio EPA has not been convinced by evidence or technical argument that releases from the subject property are not the source of the VOCs detected in the City wells. Depending on the outcome of the continuing investigation, if the contaminant levels increase, Kimberly-Clark could incur liability for mitigating the VOC impacts to the City wells. However, there is only a remote likelihood that Spinnaker (or its successors) would incur such liability (based on lack of use of

substances of concern, lack of current exposure pathways, and uncertainty regarding connections between the shallow and deeper acquifers).

Off-Site Sources of Contamination

There are several potential sources of off-site contamination that have been identified in regard to the subject property. Each of these sites is located within one-eighth mile, and hydraulically upgradient of the subject property.

- Miami Valley Gas and Fuel Co. (FKA Troy Gas Works) This facility was located immediately west of the far northwest corner of the west parking lot for the subject property. This facility was a manufactured gas plant (MGP) facility that included a large gas holder. The site was in evidence on Sanborns from 1887 to 1905. MGP sites are well-known sources of legacy contamination, primarily related to coal tar and PAHs. Dense non-aqueous phase (DNAPL) liquids are often discovered in regard to releases from these facilities.

- Hobart Cabinet – This facility was established around 1907 on property that included the former MGP facility. The facility is known to use chlorinated solvents, and halogenated VOCs, among other contaminants, were identified in soil and groundwater samples collected on the Hobart property.

- Waltzs Cleaners – This facility was a dry cleaning operation. The dates of operation were not able to be identified, but the facility is now closed. This facility is located less than one-eighth mile south (upgradient) of the subject property. Dry cleaning operations used PCE as the predominant solvent of choice. This contaminant, and its breakdown products, have been identified in upgradient wells located on the subject property.

No conclusive evidence has been gathered to confirm that the groundwater contaminants identified on the subject property are the result of former operations or releases at these off-site facilities. The possible off-site contribution to the contamination present at the subject property is a major point for Kimberly-Clark's argument that it should not be responsible for remediating the remaining contamination at the subject property. Proving this point will require additional investigation to confirm the possible contribution of the off-site sources to the contamination present on the subject property.

Closure of Aboveground Storage Tank System

In 1995, an aboveground storage tanks system was installed on the east end of the subject property, consisting of three, 10,000-gallon tanks to store virgin toluene, reclaimed toluene and methanol. The chemicals were stored in support of the former solvent-based coating operations, which were shut down in 1999. The tanks are still in place and operational. It is not known if the tanks still contain product.

It is assumed that the solvent coating operations will not be re-initiated at the subject property, and the solvent-based coating lines have been removed. As such, there is no ongoing need for the ASTs. The ASTs should be appropriately mothballed if that has not yet been done.

Closure of Toluene Recovery System

The toluene recovery system was installed to reclaim toluene from the solvent-coating operations. As described above, solvent-coating operations are no longer conducted at the subject property. The toluene recovery system should be cleaned out and removed.

Asbestos-Containing Materials

In July 1994, a comprehensive asbestos survey was completed at the subject property. The survey included locations and types of asbestos-containing materials (ACMs), and provided estimated costs for abatement. Initial abatement costs to remove all ACMs was estimated at approximately $400,000. In October 1994, new asbestos regulations changed the definition of ACM to less than 1%, versus the old standard of less than 0.1%. Subsequently, samples of brown coat ceiling plaster were collected from several areas within the facility. All results were less than 1%. As such, the total abatement cost would have been reduced to approximately $190,000. Both the 1994 consultant report and resultant internal memorandum from Kimberly –Clark indicate that the facility was "in compliance with OSHA requirements" in regard to asbestos.

As part of the terms of the purchase agreement, Kimberly-Clark conducted selective abatement, encapsulation and/or repair for several areas within the facility buildings. However, significant quantities of ACM remain in place. Any repair, removal or other activities that would disturb the ACMs will result in additional costs for abatement.

PLANT NO. 2 (130 MARY BILL DRIVE)

Closure of 10,000-Gallon Spill Tank

In 1978, a 10,000-gallon underground storage tank was installed on the northeast side of the manufacturing building. The purpose of the tank was to contain spills overfills related to raw material loading and transfer operations. The transfer area has been move to the west, making this tank obsolete. This tank should be removed and properly closed.

Site Remediation

Kimberly-Clark conducted a site investigation at the subject property in 1993. The investigation included drilling five soil borings and collecting soil and groundwater samples, primarily in the drum storage and raw material offloading areas. VOCs and PAHs were detected in several soil and groundwater samples. Limited information regarding any resulting cleanup was provided. It is known that some volume of soil was removed; however, no groundwater remediation was conducted. The concentrations of VOCs (1,1,1-trichloroethan and 1,1-dichloroethane) were below the MCLs in the samples that were analyzed.

During the inspection of the subject property, staining of the concrete pad and adjacent unpaved areas was noted in the former and current raw material offloading areas. The raw materials currently used are water-based adhesives, and therefore, significant contamination is unlikely. However, without sampling and analysis information, the absence of potential significant impacts to soil and/or groundwater cannot be confirmed.

1.0 *INTRODUCTION AND BACKGROUND*

1.1 *PURPOSE AND AUDITORS*

Environmental Resources Management, Inc. (ERM) performed a Phase I Environmental Assessment and Limited Compliance Review of the Spinnaker Coating facilities located at 518 East Water Street (Plant No. 1) and 31 Mary Bill Drive (Plant No. 2) in Troy, Miami County, Ohio (hereinafter, the "subject property"). The environmental assessment was performed for Paul, Weiss, Rifkind, Wharton & Garrison in anticipation of a financial transaction involving the facility.

The site visit was performed on 31 January 2002 and 1 February 2002 by Daniel W. Longbrake and Leigh Anne Sievert (1 February 2002 only). Grant W. Wilkinson, Esq. (Farrar, Naayers and Wilkinson), facilitated the file review. ERM was accompanied on the site visit by Mr. Ronald W. Klenk, Corporate EHS Manager, Spinnaker Coating.

1.2 *SCOPE OF WORK*

This environmental assessment was conducted in conformance with ERM's proposal NEDS-020093, dated 17 January 2002, and in general conformance with the requirements of ASTM Standard E1527-00; *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. In addition, ERM completed a limited environmental compliance review. This effort was not meant to be a comprehensive compliance evaluation. Rather, the purpose was to evaluate areas of environmental concern that could result in significant penalty or require significant capital expenditure (above the materiality threshold of $10,000 set for this project).

The assessment was conducted to evaluate the potential for environmental impacts on the subject property as a result of past or current activities on the property or surrounding properties. ERM's Phase I Environmental Assessment included:

- an on-site inspection of the subject property to evaluate current conditions and identify areas of potential concern;
- a review of property history through interviews and city directories ownership records, and historical mapping;

- observation of adjacent properties and the local area to evaluate the potential for adverse environmental impact the subject property;
- contracting of Environmental Data Resources, Inc. (EDR) to identify sites of concern as required in the regulatory records review section of the ASTM standards for a Phase I Environmental Site Assessment. The information presented in the EDR report was supplemented by file reviews or phone interviews, as appropriate;
- review of previous site assessments conducted at the facilities including site investigation and remediation reports and asbestos surveys, including sampling of suspect or presumed asbestos-containing materials (ACMs). ERM's assessment included visible observations of readily accessible building areas, though no sampling was conducted; and
- a limited regulatory compliance review to evaluate the compliance of the operations at the property with federal, state, and local regulatory requirements, and identify material instances of non-compliance.

Photographs of the site and surrounding areas were taken to document current conditions and are included in Appendix A. Property environmental records or permits, reasonably obtainable at the time of the site visit, were reviewed and copies are included in this report, as appropriate.

1.3 *LIMITATIONS*

This report is based upon the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations. Professional judgments expressed herein are based on the facts currently available within the limits of the existing data, scope of work, budget, and schedule. We make no warranties, expressed or implied, including, without limitation, warranties as to merchantability or fitness for a particular purpose. In addition, the information provided in this report is not to be construed as legal advice.

ERM is not engaged in environmental auditing and reporting for the purpose of advertising, sales promotion, or endorsement of any client's interests, including raising investment capital, recommending investment decisions, or other publicity purposes. The client acknowledges that this report has been prepared for the exclusive use of the client and agrees that ERM reports or correspondence will not be used or reproduced in full or in part for such purposes, and may not be used or relied upon in any prospectus, offering circular, or similar document. Client also agrees that

none of its advertising, sales promotion, or other publicity matter containing information obtained from this audit and report will mention or imply the name of ERM.

1.4 *LIMITING ON-SITE CONDITIONS*

No limiting conditions were encountered during the site visit. The weather during the site visit was windy and cloudy. The temperature was approximately 25°F. There were occasional snow flurries during the day, but no snow cover was present.

2.0 *SITE SETTING*

2.1 *LOCATION*

Plant No. 1 is located at 518 East Water Street, immediately south of the Great Miami River, and between one-quarter and one-half mile east of State Route 55 in Troy, Miami County, Ohio. Plant No. 2 is located at 31 Mary Bill Drive, Troy, Miami County, Ohio, approximately 1/2-mile west of Interstate 75.

The general location of the properties and the physiographic features of the surrounding area are shown on Figure 1, developed from the United States Geological Survey (USGS) 7.5 minute quadrangle Troy, Ohio dated 1982 (photorevised).

2.2 *NEIGHBORING PROPERTIES*

Plant No. 1

The subject property is located in the City of Troy, in a mixed industrial and residential area. The abutting properties include:

- *North:* earthen flood control levee, Great Miami River and City of Troy Water Treatment facility and well field (North of the river);
- *East:* Residential properties;
- *South:* Van Cleve Elementary School (former high school) and St. Patrick's School and Church; and,
- *West:* Residential properties and Hobart Cabinet.

Sensitive environmental receptors were identified adjacent to or near the subject property. Two schools (listed above) are located immediately to the south, across E. Water Street. Residential dwellings are located immediately east and west of the subject property. The Great Miami River and City of Troy water supply well field are located to the north. Each of these features or properties represents a sensitive receptor that

could present a concern with regard to potential exposures to impacts related to environmental conditions at the subject site.

The Hobart Cabinet Co. (Hobart) facility, established circa 1907, is located adjacent to the northwest portion of the subject site (West parking lot). Metal cabinets are manufactured at this facility, with SIC codes of 1522, 2541, 2542 and 2599. There is a history of solvent usage at the Hobart facility, and previous environmental sampling and analysis indicate that soil and/or groundwater impacts that are related to volatile organic compounds (VOCs) are present. The Hobart facility is still in operation.

No visual evidence of environmental concerns was observed on other immediately-surrounding properties.

Plant No. 2

Current land use in the vicinity of the subject property is mixed commercial and light industrial. Prior to 1972, the land in the vicinity of the subject property was undeveloped. The 1982 historical topographic map indicates that construction of a road and several buildings occurred between 1972 and 1982.

North: The Troy Daily News

East: American Electric Power (AEP) maintenance facility

South: Roconex , which makes pre-press equipment for graphic art industries, lighting equipment and instruments. Activities include sheet metal fabricating.

West: Undeveloped land

No visual evidence of environmental concerns was observed on other immediately-surrounding properties.

2.3 *TOPOGRAPHY AND HYDROLOGY*

Plant No. 1 is located at an elevation of approximately 820 feet above mean sea level (msl). The property slopes gently to the north-northeast towards the Great Miami River, which borders the property to the north-northeast. Although Federal Emergency Management Agency (FEMA) Floodplain data was not reported in the EDR report, an earthen flood

control levee is located immediately north of the subject property located at 518 E. Water Street.

Plant No. 2 is located an elevation of approximately 920 feet above msl and moderately slopes to the east. An intermittent stream is located just north of the property and drains to the east towards the Great Miami River, which is located approximately 1.5 miles east of the property. FEMA Floodplain data was not reported in the EDR report.

2.4 *GEOLOGY AND HYDROGEOLOGY*

Physiography and Geology

Plant No. 1 is located adjacent to the Great Miami River. Surface soils at the site are classified as well drained loamy soils of the Eldean Series. The upper 30 inches of soil are described as fine-grained soils consisting lean clays and silts. The soil from 30 to 60 inches below ground surface (bgs) is described as gravel and silty gravels. The soils have moderate infiltration rates and the depth to groundwater is reportedly greater than 6 feet bgs.

The facility is located in a buried valley consisting of alluvial deposits of outwash, with interbedded sand and gravel deposits. The buried valley deposits are approximately 290 feet deep and 3.5 miles wide.

Soils at the Plant No. 2 location are classified as silty loams of the Crosby Series. Soils within the upper 60 inches are described as fine-grained soils consisting of silt loams, silty clay loams, clay loam, and loam. The soils are reportedly poorly drained with slow infiltration rates. Depth to groundwater is reportedly 1 to 3 feet bgs. This facility is located outside of the buried valley deposits, and consists of clayey and silty ground moraine till deposits.

The upper bedrock deposits in Miami County (both Plants) consist of the Dayton dolomite, underlain by the Brassfield limestone. Both are members of the Silurian System.

Hydrogeology

Groundwater at Plant No. 1 is encountered at approximately 20 feet below grade, in the sand and gravel deposits. A clay confining layer is reported in most of the soil borings that have been drilled at the subject property. Groundwater flow is primarily to the north/northeast, with some recharge influence from the Great Miami River. The deeper sand and

gravel deposits produce prolific quantities of water. An on-site production well, and the City of Troy water supply wells located immediately north of the Great Miami River are completed in the deeper sand and gravel deposits. The City wells are completed to depths between 100 and 180 feet below grade.

Groundwater is encountered at Plant No. 2 at depths of less than 20 feet below grade. Information regarding groundwater flow direction and production capacity were not available. Based on topography and surface water features, shallow groundwater flow is estimated to be west, toward the unnamed intermittent stream. Regional groundwater flow is probably to the east, toward the Great Miami River.

3.0 SITE AND OPERATIONS INFORMATION

3.1 GENERAL SITE DESCRIPTION

Plant No. 1 (518 E. Water Street)

The facility is located on an approximately 5-acre property owned by Spinnaker Coating. Operations are conducted in one contiguous structure that has been expanded six times, but now encompasses approximately 275,000 square feet (sf). Manufacturing activities include pressure, moisture and heat sensitive adhesive papers for postage stamps, labels and other applications that is achieved by coating of rolled paper stock with water, acrylic, rubber or solvent-based (no longer used as of 1998-99) adhesives, as well as "hot-melt" glues. A description of the site processes and material use is provided in Section 3.3. A general site plan is provided as Figure 2; layout drawings for the plant, by floor are provided in Appendix B. Site visit photographs are presented in Appendix A.

The main building at the facility houses most manufacturing operations as well as administrative offices. The building was constructed in multiple phases, with the original portion of the structure dating to the late 1800's, as summarized below.

- *Pre-1900*: - 11,680 sf (Building No. 3) original construction as whiskey distillery
- *1912* – 14,200 sf (Building No. 2) addition and re-build after train derailment
- *1946* – 25,000 sf (Building No. 1)
- *1951* – 5,000 sf (Building No. 4)
- *1957* – 45,000 sf (Building No. 1A)
- *1968* – 17,300 sf (Building No. 5)

Offices are located in several areas: the ground floor of Building No. 1A; the ground, second and fourth floors of Building No. 2; the second and third floors of Building No. 3; and, the third floor of Building No. 5 (main

offices). The buildings have between one and four floors, with basements in Building Nos. 1A, 2, and 5 (boiler room and fire pump). Loading docks are located on the south side of the building, in the area of Building Nos. 1 and 3

The ground floor and basements areas are constructed of concrete block and poured-concrete floors. Other floors are constructed of wood plank floors. The interior walls are constructed of concrete block, and/or conventional wood stud and wall board. Structural steel support beams and columns and/or concrete columns are present in all buildings. Carpeting, vinyl flooring and/or floor tile are present in office, laboratory, and lavatory areas. The roofs at Plant No. 1 are combination of built up and rubber roofs. Building 1A is built up, Building 1 is rubber, Building 2 is built up, Building 3 is rubber, Building 4 is rubber, and Building 5 is rubber. The exterior of the buildings is primarily constructed of brick and mortar.

Manufacturing operations are conducted in the areas described below.

Coating Lines

- Coater No. 1 (former "lick and stick" postage; removed 2001); located in Building No. 2, ground floor
- Coater No. 2 (water-based emulsion adhesives coating); located in Building No. 2, ground floor
- Coater No. 4 (water-based emulsion adhesives coating); located in Building No. 2, ground floor
- Coater No. 5 (former solvent-based coating, now used for "barrier coat" (clay-based coating); located in Building No. 1A, second floor.
- Coater No. 6 (former solvent-based coating) – removed 1998-99; located in Building No. 1A, second floor
- Coater No. 15 (former wax paper coating line; removed 1996-97); located in Building No. 3, ground floor
- Coater No. 16 (heat seal coating; removed 2000) located in Building No. 3, ground floor

Mixing Areas

- Building No. 1A, second floor – four former solvent mixing tanks, now two of the tanks are used for mixing related to the "barrier coat" line
- Building No. 2, ground floor – three mixing tanks
- Building No. 2, second floor – three coating tanks
- Building No. 3, second floor – four mixing tanks

Sheeters, Slitters, Trimmers (used to cut paper to size)

- No. 33 Sheeter – Building No. 1A, ground floor
- No. 38 Trimmer –Building No. 1A, ground floor
- No. 51, 52, 53, 57, 58 and 59 Slitters – Building No. 1
- No. 21 and 22 "Breakers" – Building No. 2, third floor
- No. 30 and 31 Sheeters – Building No. 2, third floor
- No. 36 Sheeter – Building No. 2, third floor

Maintenance and Repair activities are conducted on the second floor of Building Nos. 4 and 5, including forklift repair. Some form of roll or product storage occurs in nearly every building and floor.

One outbuilding, located in the west parking lot, houses a groundwater treatment system, and a second outbuilding houses hazardous waste storage. The outbuildings are constructed of corrugated aluminum with concrete floors/bases.

Three, 10,000-gallon capacity aboveground storage tanks (ASTs) are located on the northeast side of the subject property, used to store1,1,1-trichloroethane, isopropyl alcohol and fuel oil. The tanks are double-walled and located inside a concrete secondary containment dike with a concrete base. These tanks formerly supplied the solvent-coating lines. The tanks are still in place and operational, but are no longer used. The former solvent recovery system is located along the east side of Building No. 1A, inside a secondary containment dike with concrete walls and base. Chemical unloading occurs on the north side of Building No. 2, with a concrete pad and associated grate drain system that ties into the wastewater system. Bulk adhesive unloading occurs on the west side of Building No. 5.

Most operational areas of the facility grounds are paved with concrete or asphalt. However, open, unpaved gravel, grass or bare soils are located along the north side of the buildings. A chain-link fences surrounds the south, west and east sides of the subject property. An earthen flood control levee covered with grassy vegetation is located along the north side of the subject property. No areas of obvious staining were noted on the exterior grounds. Some obsolete equipment is stored in the far northwest portion of the west parking lot, on asphalt pavement.

The subject property includes one parcel of undeveloped land that is situated between two residential structures to the west of the west parking lot (approximately 45 feet by 55 feet). The northern edge of this lot is adjacent to the northwest portion of the west parking lot. The lot is vegetated with grass and several trees. No indications of disposal, staining or stressed vegetation were observed. No standing water was observed on the exterior grounds.

Plant No. 2 (130 Mary Bill Road)

The facility is located on an approximately 5-acre property owned by Spinnaker Coating. Operations are conducted in one building that was constructed in two phases. The original building was constructed in 1977, and the building was doubled in size in 1985. The total square footage under roof is 100,000 sf. Much of the coating that was formerly conducted at Plant No. 1 has been moved to this facility. Manufacturing activities include two silicone coating lines (Coater Nos. 19 and 20), which produce liner and backing that feeds the other coaters at both Plant No. 1 and Plant No. 2, and a coating line that was moved from Plant No. 1 (hot-melt glue coater No. 17). Coater No. 18 was also moved from Plant No. 1, but is no longer used.

Five slitters are present in the southeast portion of the building, but are rarely used. Most slitting has been out-sourced. Raw material storage is located inside on racks, along the west side of the building. Glue transfer and mixing is located in the north-central portion of the building. Five large mixing tanks are located in the northwest portion of the building. Rolled paper stock occupies the central portion of the building, running the length of the building from west to east. Maintenance, small-scale laboratory activities, storage and some offices are located in the mezzanine levels on the north and south sides of the building. Administrative offices are located near the entrance on the east side of the building.

The building is constructed of concrete block and poured-concrete floors. Corrugated aluminum siding sheaths the building exterior. The interior walls are constructed of concrete block, and/or conventional wood stud and wall board. Structural steel support beams and columns are present in the building. Carpeting, vinyl flooring and/or floor tile are present in office, laboratory, and lavatory areas. The roof at Plant 2 is a flat built up roof.

No outbuildings were identified at Plant No. 2. Most operational areas of the facility grounds are paved with concrete or asphalt. Loading docks are located on the southwest corner of the building. Open, unpaved gravel, grass or bare soils are located along the north and west side of the building. A hazardous waste and drum storage area is located outside, on the north side of the building. The area is fenced, with a concrete berm and concrete floor with a blind sump. Bulk adhesive loading is conducted along the north side of the building, and was formerly located further to the east along the building. Significant staining was identified in both areas. The loading areas are paved with concrete, but staining was observed on unpaved land surface adjacent to both areas.

The subject property includes one parcel of undeveloped land adjacent to the facility. Encompassing approximately 5 acres, the lot is vegetated with grass. No indications of disposal, staining or stressed vegetation were observed. No standing water was observed on the exterior grounds.

A description of the site processes and material use is provided in Section 3.3. A site plan is provided as Figure 3. Site visit photographs are presented in Appendix A.

3.2 *UTILITIES*

The facilities are provided with utilities as describe below.

Plant No. 1 (518 E. Water Street)

- Water is provided from on-site supply wells (process water only) and the City of Troy;
  - The exact location and construction of the on-site well is not known. Studies that were conducted in an effort to determine its location indicate that it is located approximately 10 to 20 feet north of Building No. 4. The groundwater pumping room and associated

equipment are located on the ground floor of Building No. 4, and underground piping leads from the well to this location.

- Sewer service from the City of Troy;
- Electricity from Vectren (discounter) with Dayton Power & Light (DP&L) transmission line usage;
- Natural gas by International Gas Services (discounter), again via DP&L transmission lines.
- Four, natural-gas fired steam boilers for process and building heat are present on the subject property:
  - Basement of Building No. 1A
  - Basement of Building No. 2 (2))
  - Second floor of Building No. 2 – used to steam paper (to take out curl)
  - Basement of Building No. 5

The office areas in Building 5 are equipped with a centralized heating, ventilation and air conditioning (HVAC) systems. Roof-mounted natural gas and electric heating and cooling systems are present. Climate control and air conditioning units for office areas in Building No. 2 are located on the fourth floor of the building.

Plant No. 2 (130 Mary Bill Drive)

- Water from the City of Troy;
- Sewer from the City of Troy;
- Electricity from Vectren (discounter) with Dayton Power & Light (DP&L) transmission line usage;
- Natural gas by International Gas Services (discounter), again via DP&L transmission lines;
- One natural-gas fired steam generator and stand-by boiler provide steam for process and building heat;

The office areas are equipped with a centralized heating, ventilation and air conditioning (HVAC) systems. Roof-mounted natural gas and electric heating and cooling systems are present.

3.3 *PROCESSES AND MATERIAL USE*

Current Operations

The Spinnaker facilities produce pressure, moisture and heat sensitive adhesive papers for postage stamps, labels and other applications. Operations include coating of rolled paper stock with water, acrylic, rubber or solvent-based (no longer used) adhesives, as well as "hot-melt" glues. The facility operates under SIC code of 2671. Operations are conducted on a 24-hour per day, five day per week basis. The facility employs a total of 50 hourly personnel at Plant No. 1 and 85 hourly personnel at Plant No. 2. Various engineering, administrative, executive and support staff brings the total employment in Troy to approximately 170 employees.

On-site operations include coating of rolled stock paper, and limited flexographic printing. Adhesives and glues used in the coating process are stored and mixed in aboveground tanks located in various parts of both facilities. Although now limited, operations also include slitting, cutting and packaging of the coated paper products. Raw materials and finished goods are shipped or received by truck.

Water-based, pressure-sensitive emulsion adhesives came into use in the 1970's. Development was initiated at Plant No. 1, but now occurs primarily at Plant No. 2.

Discontinued Operations

Plant No. 1

From the late 1800's until 1922, the facility was a whiskey distillery, and occupied what is now Building No. 3. The distillery was a secondary facility related to the original, main distillery operation located approximately one-quarter mile west of the subject property.

Solvent-based coating lines (Coater Nos. 5 and 6) were operated at the subject site from the 1960's to October 1999. These coaters have been removed. Solvent-based coating is now conducted by IVEX Coatings, under an alliance agreement, and marketed by Spinnaker Coating. The

chemical ASTs and solvent recovery system that were associated with the solvent-based coating line are still present at the subject property, but are no longer used. As previously described, these tanks are still in place and operational. The solvent-based coatings involved the use of Pandex solvent, toluene, methanol, isopropyl alcohol and polymers.

Coater Nos. 1, 2, 15 and 16 are no longer used. These coaters were related to wax paper coating and hot seal coating. The hot seal coating operations consisted of plastic that was melted to paper stock that crystallized upon cooling. Hot air was blown on the stock to adhere to bottles (primarily for the pharmaceutical industry).

Three slitters were removed from the site in the late 1990's. In addition, the majority of slitting operations are now out-sourced, but some slitting is conducted at the facility on a periodic basis.

A former staype (tape with reinforcing string) operation was formerly located on the ground floor of Building No. 4. No equipment associated with this former operation was still in place. On a 1957 facility drawing, a "pit" was located in the basement near this operation. The former use and status is unknown. No evidence of the "pit" was identified during the inspection of the subject property.

Plant No. 2

Coater No. 18 is no longer used. This coater was used for silicone-based coating.

3.4 *CHEMICAL USE AND STORAGE*

Chemical use at the facilities relates primarily to raw materials used in the formulation of water-based glues and adhesives. Plant No. 1 also produces a clay and rubber-based coating, called "barrier coat". Limited chemical usage occurs in the maintenance areas at both facilities. Chemicals are stored in bulk tanks, totes and containers.

Container Storage

Plant No.1

Chemical use at the facility relates primarily to maintenance operations and production support as outlined below:

- Inks are stored in 5-gallon containers next to the flexographic printing line;
- 5-gallon flammable cans containing solvent, primarily naphtha, that is used to clean equipment is stored on carts in building 1A;
- Boiler water treatment chemicals are stored in 55-gallon drums in the boiler room of building 1A and 2;
- Water-based emulsion adhesives are stored in 300-gallon totes next to the adhesive coating lines in building 2;
- 55-gallon drums of isopropyl alcohol and naphtha stored in flammable cabinets, and ammonia in plastic containers stored in a dedicated freezer, are located on the first floor of building 2;
- The oil storage area is located on the mezzanine of building 2;
- Laboratory reagents are stored on the fourth floor of building 2 in the laboratory and in the adjacent storage room;
- Maintenance chemicals are stored in the maintenance shop located in building 4; and
- Hydraulic oil for elevator maintenance is stored in a cage on the second floor of building 5.

Chemicals are stored inside the building on areas with concrete floors, and, in the case of isopropyl alcohol and naphtha, within flammable storage cabinets.

ERM did not observe evidence of spills or releases in the chemical use and storage areas.

Plant No. 2

Chemical use at the facility relates primarily to maintenance operations and production support as outlined below:

- The oil storage area is located in the east side of the boiler room;
- Boiler water treatment chemicals are stored in the boiler room;
- Raw material drum storage is on the racks on the west side of the building; and

- Maintenance chemicals are stored in the maintenance department.

Chemicals are stored inside the building on areas with concrete floors.

ERM did not observe evidence of spills or releases in the chemical use and storage areas.

3.4.2 *Underground Storage Tanks*

Plant No. 1

Several underground storage tanks (USTs) were previously utilized at the subject property for storage of various chemicals and waste. The listing of former USTs is provided below. Former tank locations are shown on Figure 4.

Table 1. ***Underground Storage Tanks at Plant No. 1***

Tank Identification	Contents	Location	Status
3,000-gallon bare steel	Toluene recovered from solvent recovery system	East side of Building 1A	Installed circa 1973 Removed 7/11/88
3,000-gallon bare steel	No. 2 fuel oil	Loading dock	Installed circa 1970 Removed 6/30/86*
15,000-gallon bare steel	No.2 fuel oil	Under floor – Building No. 1	Installed circa 1951, Abandoned in place (filled with concrete slurry) 10/14/88
500-gallon bare steel (some reports list as 400-gallons)	Gasoline (leaded)	East of former hazardous waste storage area	Installed circa 1958 Removed 12/15/88

*Most of the information in the files indicates this as the removal date, although there was some conflicting information indicating 1988 as the date of removal.

A *Notification for Underground Storage Tanks* form was submitted to the Ohio Department of Commerce, Division of State Fire Marshal on August 28, 1987 for the tanks that are listed above. No notification was made in regard to the 3,000-gallon fuel oil-spill pad tank that was identified in the files maintained at the subject property. No information provided indicating the former construction of this tank. Thus, it cannot be confirmed if this tank should have been registered.

On October 12 to 15, 1987, tank tightness testing was conducted for the 500-gallon gasoline UST and the 3,000-gallon toluene UST. The 3,000-gallon fuel oil UST had been previously removed. The results of the tightness testing indicated that the toluene tank failed the test at a leak rate of –0.7209 gallons per hour (gal/hr), which was well above the recommended standard of +/- 0.05 gal/hr.

In April 1988, the City of Troy Fire Department authorized the closure of the 3,000-gallon toluene UST and the 500-gallon gasoline UST (this tank is referenced as either a 400-gallon or 500-gallon tank, depending on the source of information) by removal, and the in-place abandonment of the 15,000-gallon fuel oil UST (filled with concrete slurry). Hines Builders conducted the abandonment/removal of the tanks. No information regarding the absence or presence of impacts to soil and/or groundwater was identified by ERM in regard to the 5,000-gallon fuel oil tank. No information was available regarding sampling conducted at the time of closure; however, subsequent sampling and investigation in the area of the gasoline UST was conducted in 1993-94 (see Section 4.3).

In regard to the 3,000-gallon toluene tank, impacts were identified during tank closure activities. Correspondence in the files provided to ERM indicate that Kimberly-Clark, via a 29 July 1988 internal memorandum, worked to retain a firm to conduct additional sampling and analysis to further define the nature and extent of impacts to soil and/or groundwater. Although no information was identified in the files, it is assumed that the additional investigation was conducted. In evidence is a 14 September 1988 letter from Kimberly-Clark to the Ohio EPA, Division of Solid and Hazardous Waste Management in which the release and resulting investigation was discussed. In the letter, Kimberly-Clark reported that contaminated soil was found down to a depth of approximately 10 feet below grade, where a clay layer was identified. It was reported that the impacts did not penetrate the clay layer. Further, the letter indicated that Kimberly-Clark was in the process of retaining a contractor to remove and dispose of the stockpiled soils. Apparently, more than one year passed before the work was conducted, as evidenced by a 20 October 1989 request for proposal from Kimberly-Clark to a local contractor (Ecolotec) to conduct additional investigation. Information regarding eventual remedial efforts are presented in Section 4.2.

Table 2. Other "Tanks" of Potential Concern at Plant No. 1

Tank Identification	Contents	Location	Status
20,000-gallon bare steel	No. 2 fuel oil	Hobart/Spinnaker	Hobart is owner/operator Still present, current status of operation not known
3,500-gallon "spill tank"	Contained spills from raw material off-loading	North side – Building No. 2	Installation date unknown Removed 1986
2 x 2,000-gallon aeration "tanks"	Toluene and alcohol	Northeast corner – Bldg. 1A	Installation date unknown Removed 1990's

A 20,000-gallon fuel oil UST straddles the former Hobart/Spinnaker property line (now completely on Hobart property). The tank is still present. In 1994, Kimberly-Clark conducted an investigation around the tank, and near the abandoned railroad spur to identify potential impacts to soil. A total of 8 soil borings were drilled. Polynuclear aromatic hydrocarbons (PAHs) and low levels of benzene, toluene, ethylbenzene and xylenes were identified in one or more of the borings. Although PAHs could be related to a release of fuel oil, in this case it appears unlikely because no measurable levels of total petroleum hydrocarbons and very low levels of naphthalene were detected in the samples. Also believed to be unrelated to the fuel oil tank, halogenated VOCs were identified in several borings, including trichloroethene, tetrachloroethene and associated breakdown products.

Several documents reference a 3,000- to 3,500-gallon "spill" tank that was present on the north side of Building 2 to contain spills or leaks that occurred during railcar, and more recently, truck off-loading of chemicals. It was reported in the files in 14 September 1993 document that this "tank" was removed 30 June 1986. Mr. Ron Klenk, Corporate EHS Manager for Spinnaker, indicated that it was/is a sump. No additional information was identified in regard to this "tank".

Two "aeration tanks" (actually a vault) were formerly located on the northeast corner of Building No. 1A. Mr. Ron Klenk reported that these were essentially gravel-filled pits where solvent-contaminated wastewaters were transferred. Air would be bubble up through the water to volatilize the VOCs that were present in the water. This area was removed during subsequent remedial activities conducted at the subject property, as discussed in Section 4.2.

Plant No. 2

Three USTs were formerly present at the subject property, as listed below. The spill tank is still in place, but is not being used.

Table 3. *Underground Storage Tanks at Plant No. 2*

Tank Identification	Contents	Location	Status
2 x 20,000-gallon bare steel	No. 2 fuel oil	Northeast side of building, outside near former chemical offloading area	Installed 1976 Removed 27 October 1988
10,000-gallon bare steel "spill tank"	Waste fluids from spills related to chemical offloading	Northeast side of building, outside near former chemical offloading area	Installed 1976 Still in place

In October 1988, the two, 20,000-gallon fuel oil USTs were removed by Hines Builders. During excavation of the "west" tank, evidence of a release was identified. It was reported in a 4 November 1988 Kimberly-Clark internal memorandum that the release occurred as the result of an overflow in preparation for a November 1987 tank tightness test. The stained soil was removed, and confirmatory samples were collected. In addition, a sheen of oil was reported on the water present in the excavation. At the direction of the Troy Fire Department representative, absorbent pads were used to clean up the sheen.

One, 10,000-gallon bare steel UST is present at Plant No. 2 to contain spills of "non-hazardous" chemicals in the offloading area. The tank collected fluids via a 3-inch diameter fill port that is flush with the concrete pad. Significant staining was identified on the pad and surrounding soil. The offloading area has been moved further to the west, and this area is no longer used for offloading. The tank is still in place.

Aboveground Tanks

Plant No. 1

An aboveground storage tank (AST) farm was formerly located west of Building No. 5 (see Figure 4). The area consisted of a 10,000-gallon virgin methanol tank, a 10,000-gallon virgin toluene tank, a 30,000-gallon fuel oil tank, and a 10,000-gallon fuel oil tank (later converted to a recovered toluene tank). Underground piping to the converted recovered toluene

tank ran from the solvent recovery area along the north side of the buildings to the tank. Aboveground conveyance piping related to the other tanks ran along pipe racks that were affixed to the north side of the buildings.

Table 4. *Outdoor AST Summary for Plant No. 1*

Tank Identification	Contents	Location	Status
30,000-gallon steel upright tank	No. 2 fuel oil	West tank farm	Removed Spring 1995
10,000-gallon steel tank	No. 2 fuel oil; converted to reclaimed toluene	West tank farm	Removed Spring 1995
10,000-gallon steel tank	Virgin toluene	West tank farm	Removed Spring 1995
10,000-gallon steel tank	Virgin methanol	West tank farm	Removed Spring 1995
10,000-gallon double-walled steel	Virgin toluene	East tank farm	Installed 1995No longer used
10,000-gallon double-walled steel	Virgin methanol	East tank farm	Installed 1995No longer used
10,000-gallon double-walled steel	Reclaimed toluene	East tank farm	Installed 1995No longer used

In 1993, a site investigation was conducted by GZA Geoenvironmental, Inc. (GZA) and Applied Environmental Services, Inc. (AES), including investigation of the soil/groundwater in the area of the ASTs. Results of the investigation are provided in Section 4.2. Based on the results of the investigation, a remediation plan was developed that included removal of the ASTs. In 1995, the tanks were removed as part of the remedial efforts at the subject property.

In 1995, a new AST tank farm was constructed on the east side of the subject property. Three, 10,000-gallon ASTs were installed. The tanks stored virgin toluene and methanol and reclaimed toluene. The tanks are double-walled enclosed steel tanks situated in a concrete containment dike. All piping is above grade. These tanks were taken out of service in 1999 when the solvent-based coating operations were discontinued. The tanks and associated piping are still in place.

Table 5. *Indoor AST Summary for Plant No. 1*

Tank Identification	Contents	Location	Status
Tanks 5A and 5B	Former solvent-based coating mixing tanks, now used for mixing for barrier coat (clay-based)	Building 1A – second floor	Still in use for barrier coating line
Tanks 6A and 6B	Former solvent-based coating mixing tanks	Building 1A – second floor	No longer in use, still present
Mixing tanks (3)	Glues/adhesive	Building 2 – ground floor	
Coating tanks (3)	Glue mixing	Building 2 – second floor	Tanks no longer used
Mixing tanks (4)	Glues (hot seal)	Building 3 – second floor	No longer used, two tanks remain
Melting tanks (2)	Wax	Building 3 – second floor	No longer used
Bulk storage tank (6,000-gallon)	Adhesive	Building 5 – ground floor	Currently in use

Plant No. 2

There are no ASTs located outside at Plant No. 2. Several storage tanks are located inside the building, as summarized below in Table 6. Water-based raw materials are transferred from tanker trucks through in-plant piping to the storage tanks. The transfer area for the glue storage and mixing tanks is located on a concrete pad with a trenched containment pit designed to collect any releases of materials.

Table 6. *Indoor AST Summary for Plant No. 2*

Tank Identification	Contents	Location	Status
10,000-gallon glue mixing tanks (3)	Glue	Northwest corner of building	Currently in use
5,000-gallon glue waste tank (1)	Glue waste	Northwest corner of building	Currently in use
Chill tank	Water	North side of building, near center	Currently in use
11,000-gallon glue mix tank (1)	Glue	Northwest corner of building	Currently in use
5,000-gallon water-based raw material tanks (3)	Water-based raw materials	Northwest corner of building	Currently in use

SARA/ EPCRA

Plant No. 1

According to facility personnel, the facility evaluates the hazardous constituents of all materials used on site on an annual basis to determine the SARA release reporting (Form R) and Emergency Planning and Community Right to Know Act (EPCRA) hazardous chemical inventory (Tier I and II) reporting requirements for the facility.

EPCRA Tier II inventory reporting has been completed for ammonia and sulfuric acid, both in bottles and in fork truck batteries, for 1998 through 2000. Methanol and toluene were also reported for calendar years 1987 through 1999 and 1,1,1-trichloroethane was reported for calendar years 1988 through 1992.

The facility's Standard Industrial Classification (SIC) code of 2671, is a designation that subjects the facility to Form R release reporting requirements under EPCRA. Because the facility processed or otherwise used EPCRA Section 313 chemicals in excess of the applicable thresholds, Form R reporting was required prior to the removal of the solvent-based coating operations.

The facility last filed a Form R report for calendar year 1999 when it reported processing toluene and methanol in excess of the 25,000 pound processing thresholds. No releases were reported. The facility reported air emissions, on-site recycling and energy use off-site.

Form R reporting is no longer required at the facility, as solvent-based coating operations are no longer conducted.

Plant No. 2

According to facility personnel, the facility evaluates the hazardous constituents of all materials used on site on an annual basis to determine the SARA release reporting (Form R) and Emergency Planning and Community Right to Know Act (EPCRA) hazardous chemical inventory (Tier I and II) reporting requirements for the facility.

EPCRA Tier II inventory reporting for the facility has been limited to sulfuric acid contained in fork truck batteries and vinyl acetate, a component of several raw materials, between 1998 and 2000.

The facility's Standard Industrial Classification (SIC) code of 2671, is a designation that subjects the facility to Form R release reporting requirements under the EPCRA. The facility does not process or otherwise use EPCRA Section 313 chemicals in excess of the applicable thresholds, therefore Form R reporting is not required. Form R reports were filed for 1,1,1-trichloroethane from 1987 through 1992

Spill Prevention Control and Countermeasure (SPCC) Plans

Plant No. 1

The volume of petroleum stored on site is over the applicable thresholds of 1,320 gallons in aggregate. Based on the volume of petroleum stored on site, the facility is subject to SPCC Plan requirements (40 CFR 112). Although a plan was not available for review during the site assessment, according to Ronald Klenk, the requirements of the SPPC Plan have been incorporated into the Hazardous Waste Contingency Plan.

Plant No. 2

The volume of petroleum stored on site is below the applicable thresholds of 1,320 gallons in aggregate and there are no petroleum storage tanks. Based on the volume of petroleum stored on site, the facility is not subject to the SPCC Plan requirements.

Other Plans

Although not made available for review, it is reported that each facility maintains a Hazardous Waste Contingency Plan.

3.5 *HAZARDOUS AND NON-HAZARDOUS WASTE MANAGEMENT*

Hazardous Waste

Plant No. 1

Permitting and Enforcement History

In 1980, Kimberly-Clark submitted the *Notification of Hazardous Waste Activity* form to the US EPA. A hazardous waste storage pad was constructed west of the buildings (see Figure 2). In addition, a RCRA Part A application was submitted.

In 1982, the Ohio EPA conducted a hazardous waste inspection. Several deficiencies were reported related to waste manifesting and training. Per an inspection report by Ohio EPA in 1984-85, the deficiencies were corrected.

In 1986, Kimberly-Clark requested the withdrawal of the Part A Permit Application. Based on the information provided, the US EPA determined that a permit was not required for the subject property.

In 1988, Kimberly-Clark reported to the US EPA the storage of sodium pentachlorophenol (from a boiler additive). The 90-day storage limit had been exceeded because no outlet for disposal could be identified. The waste was generated in 1987. A RCRA closure plan was prepared, and the waste sodium pentachlorophenol storage area was closed in 1989. On 26 July 1989, the waste was transported to Technical Environmental Services, Inc. in LaPorte, TX for disposal.

In 1991, the Ohio EPA conducted a hazardous waste inspection. Several administrative violations were identified, but were not determined to have material impact.

In 1992, the US EPA, Region 5 (using PRC Environmental as a contractor) conducted a Preliminary Assessment/Visual Site Inspection (PA/VSI) at the subject property to determine the need for RCRA corrective action, and list the property in terms of priority for action. The inspection was conducted as a result of the Part A permit application for the sodium pentachlorophenol waste, and resulting closure efforts. During the inspection, several solid waste management units (SWMUs) and areas of concern (AOCs) were identified:

- SWMU 1 – former pentachlorophenol waste storage area

- SWMU 2 – hazardous waste storage pad (outside)
- SWMU 3 – satellite accumulation areas (6)
- SWMU 4 – waste oil storage area
- AOC – removed/closed USTs
  - 400-gallon gasoline UST (removed)
  - 3,000-gallon fuel oil UST (removed)
  - 3,000-gallon toluene UST (removed)
  - 15,000-gallon fuel oil UST (closed in place – under building)

The inspection yielded a low priority ranking for the subject property. A review of the current RCRA corrective action databases listed Spinnaker Coating as a low priority site.

Waste Generation, Management, Recordkeeping and Reporting

The facility has been a large quantity generator of hazardous waste (USEPA ID No. OHD088648282). Removing the solvent-based coating lines has reduced the amount of hazardous generated to below the threshold of a large quantity generator. Approximately 220 pounds of hazardous waste were generated in 2000, 22,500 pounds in 1999 and 63,000 pounds in 1998. The primary hazardous wastes still generated at the facility are waste combustible liquids, waste flammable liquids, waste petroleum naphtha and flammable liquids with rags and filters with waste codes D001, D008, D018, D039, D040, F003, F005.

Waste is sent to one of the following disposal facilities for fuel blending:

- Safety Kleen, OHD980587364, located in Hebron, Ohio
- Rineco, ARD981057870, located in Benton, Arizona
- Safety Kleen, KYD053348108, located in Smithfield, Kentucky

Hazardous waste is staged inside flammable cabinets inside the fenced hazardous waste storage area located on the western side of the property. The cabinets are installed on concrete pads, and provide secondary containment.

The facility appears to be operating in compliance with the administrative requirements for large quantity generators of hazardous waste. These

requirements include completion of manifests and land disposal restriction forms, recordkeeping, employee training, labeling, emergency planning, inspections and annual reporting.

Plant No. 2

The facility is a large quantity generator of hazardous waste (USEPA ID No. OHD980569263). Approximately 3,800 pounds of hazardous waste were generated in 2000, 5,300 pounds in 1999 and 10,700 pounds in 1998. The primary hazardous wastes generated at the facility are waste combustible liquids, waste flammable liquids, waste petroleum naphtha and flammable liquids with rags and filters with waste codes D001, D018, D039, D040 and F024.

Waste is sent to one of the following disposal facilities for fuel blending:

- Safety Kleen, OHD980587364, located in Hebron, Ohio
- Rineco, ARD981057870, located in Benton, Arizona
- Safety Kleen, KYD053348108, located in Smithfield, Kentucky

Hazardous waste is staged inside the fenced hazardous waste storage area located on the northern side of the property. The pad is constructed of concrete and includes a concrete berm around the containment area, with a dead-head sump located near the center of the area.

The facility appears to be operating in compliance with the administrative requirements for large quantity generators of hazardous. These requirements include completion of manifests and land disposal restriction forms, recordkeeping, employee training, labeling, emergency planning, inspections and annual reporting.

Non-Hazardous Waste

Plant No. 1

Non hazardous solid waste is generated at the subject property. Recyclable paper, aluminum, glass, plastic and cardboard materials are stored in small bins or containers inside the buildings. Solid waste and wood are stored outside of the building in three 20-cubic yard roll-off containers. The solid waste and recyclable materials are removed regularly by Industrial Waste Management and shipped to the Miami County Transfer Station.

Waste paper is shredded and baled. The paper is sent to an off-site facility for pelletizing. The pelletized paper is used as a fuel source. Because slitting is now done only periodically at this facility, the shredder is used infrequently.

Minimal volumes of waste oil and grease are generated, primarily from maintenance activities.

An incinerator was formerly located on the subject property (at least until 1957 as shown in facility drawings), in the northeast corner of what is now Building No. 5. Two concrete-lined ash pits were associated with the incinerator. It was reported that the incinerator only accepted paper trash, and that the ash was sent off-site for disposal. No additional information was available regarding the dates of operation, the removal of the incinerator and ash pits, or the final disposition of the ash.

Plant No. 2

Non-hazardous waste management practices at Plant No. 2 are similar to those for Plant No. 1. Waste paper is either baled or placed in a compactor that is loaded inside on the south side of the building, with the compactor being located outside.

Minimal volumes of waste oil and grease are generated, primarily from maintenance activities.

Off-Site Waste Disposal Evaluation

Kimberly-Clark, as the successor to Brown Bridge Paper Company, has pending Superfund liability for waste that was shipped to the Chemical Waste Management facility located in Springfield, Ohio prior to 1981. The 1994 purchase agreement specifically indemnifies Spinnaker with regard to any off-site liabilities prior to the closing date (September 1994), including potential Superfund liabilities.

3.6 *WATER, WASTEWATER AND STORMWATER*

Water

The facility is connected to the City of Troy public water system. The public water supply is used for all potable and sanitary uses on-site. However, two on-site production wells are used in combination with the public water supply to provide process water supply. As described in

Section 3.2, the exact details regarding the construction and location of the well are not known. The facility uses about 20,000 gallons per day (gpd) of water from the City of Troy (12,000 gpd process/8,000 gpd sanitary). Spinnaker augments the process water usage with an average of 10,000 gpd from the on-site production wells.

Water samples have been collected from the on-site supply well (combined flow at wellhead) on several occasions. No VOCs have been detected in the water samples during any sampling events.

Sixteen groundwater monitoring wells (GZA-1 and 2; EEIB –2, 4, 8, 9, and 12; and, KMW- 1 through 9)are present at the subject property, along with four groundwater recovery wells (PW-1 through PW-4), four air sparging wells (AS1 through AS4) and five vapor extraction wells (SVE1 through SVE5). The wells were installed during various stages of environmental investigations that have been conducted. In addition, four groundwater pumping wells were installed at the subject property in conjunction with the groundwater pump and treat system installed in 1995. These wells continue to operate. Until June 1997, treated groundwater was discharged to the City of Troy POTW. Kimberly-Clark applied for and obtained an NPDES permit to discharge the treated groundwater to the Great Miami River, and began discharging to the river in June 1997.

Wastewater

Plant No. 1

The facility has an out-of-service (last year) cooling tower that was used with a previous cooling water system.

Non-contact cooling water is discharged to the Great Miami River via one outfall, a 12-inch diameter storm water line (NPDES Permit No. OH0010626). The storm water pumping and transfer station is located in the basement of Building No. 2, on the north side of the building. The discharge line extends underground, north to the Great Miami River. The outfall was located beneath the water level of the river on the date of the site inspection.

ERM reviewed quarterly wastewater monitoring data for 1998 through 2001. The data revealed that the facility exceeded the zinc standard in June and September in 1998. According to facility personnel, the zinc was a component of some of the adhesives. No other violations were noted.

Other process wastewater is generated in regard to the coating operations. This water is either re-circulated within the system, or contained with adhesive waste in waste totes for off-site disposal.

Treated effluent from the groundwater remediation system is discharged to the Great Miami River (NPDES Permit No. 1IFOO009*ED). Monitoring general water quality parameters are VOCs and PAHs. Available records indicate that the effluent concentrations have been in compliance with the applicable standards. It was reported that PAHs were detected, but not at concentrations above the discharge limits. The actual discharge monitoring reports are maintained by Kimberly-Clark, and were not available for review.

Annual Pretreatment Program Inspections conducted by the City of Troy, Utilities Supervision for sanitary discharges were reviewed for 1998 through 2000. The facility was in compliance with all requirements.

Plant No. 2

Wastewater discharges from the facility are limited to sanitary, boiler blow-down and non-contact cooling water and are released to the sanitary sewer. Based on our current understanding of site conditions and discharges, no permit is required for these discharges.

Stormwater

Plant No. 1

Precipitation that falls on the subject property is collected in a number of storm drains in paved and unpaved areas that tie into the Great Miami River to the north of the subject property. In 1994, Spinnaker submitted a Notice of Intent (NOI) to apply for coverage under the Ohio General Permit (Permit No. OHR000002) That permit expired in 1999. In 1999, Spinnaker submitted an NOI for coverage under the new Ohio General Permit (Permit No. OHR000003). That NOI was never processed by Ohio EPA. In January 2002, Spinnaker re-applied for coverage under the new Ohio General Permit. Currently, stormwater from the plant is discharged to the Miami River pursuant to the facility's NPDES permit for discharge of non-contact cooling water.

The facility prepared a storm water pollution prevention plan (SWP3) in 1994. This plan has not been updated since 1994. Evidence of annual compliance certification were not identified in the files.

Plant No. 2

Precipitation that falls on the subject property is collected in a number of storm drains in paved and unpaved areas that tie into the storm sewer system that drains from the southeastern corner of the property, to a nearby retention pond and eventually to the Great Miami River.

Although no record of a permit was identified for Plant No. 2, it is reported that a similar permitting history (1994 – 1999) was the case for this property. On 11 September 2000, the Ohio EPA submitted a request for renewal of the permit. On 16 January 2002, Mr. Grant Wilkinson (legal counsel for Spinnaker) discussed the permit status with Mr. John Morrison (Ohio EPA, Division of Surface Water). On 17 January 2002, a NOI was submitted by Spinnaker for coverage under the new Ohio EPA General Permit (Permit No. OHR000003).

The facility prepared a SWP3 in 1994. This plan has not been updated since 1994. Evidence of annual compliance certification were not identified in the files.

3.7 *AIR EMISSIONS*

Plant No. 1

The facility, Ohio EPA Premise number 0855140083, is subject to Title V federal operating permit requirements. The Title V permit was issued draft October 29, 1999 and is expected to be issued final in April 2002. The permit lists the following insignificant emissions units:

- B001, Leffel boiler #4
- B002, Bryan model L-56 boiler
- B003, Leffel boiler #2
- B004, Leffel boiler #3
- K008, #16 coater
- L001, Safety Kleen degreaser
- P004, Majac grinder
- T001, Reclaimed toluene tank
- T002, Methanol tank
- T003, New toluene tank
- T006, Holding tank 5A
- T007, Holding tank 5B
- T008, Holding tank 6A
- T009, Holding tank 6B

- Z001, Slitting space heater
- Z002, Solvent space heater
- Z007, Heat seal mix
- Z011, #26 duster (no longer used – associated with heat seal)

The following emissions units have specific terms and conditions.

- K002, Paper coater no. 5, limited to compliant coating use, less than or equal to 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents

- K003, Paper coater no. 1, limited to compliant coating use, less than or equal to 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents

- K004, Paper coater no. 2 with flexographic printing, limited to 40% VOC by volume of the coating and ink, excluding water and exempt solvents or 25% VOC by volume of the volatile matter in the coating and ink. Limited to 400 kilograms of hazardous air pollutants per month.

- K006, Paper coater no. 4, limited to compliant coating use, less than or equal to 2.9 pounds of volatile organic compounds (VOC) per gallon of coating, excluding water and exempt solvents

- K010, Flexographic printing press no. 61, limited to 40% VOC by volume of the coating and ink, excluding water and exempt solvents or 25% VOC by volume of the volatile matter in the coating and ink. Limited to 400 kilograms of hazardous air pollutants per month. State only requirements that were part of the issued Permit to Install 08-3949 reflect the potential to emit, 1.55 pounds per hour and 6.79 tons per year, and limit coating to 16% VOC by volume of the coating and ink excluding water are also included.

Some of the permitted emission units are no longer present, or are not in use. As part of post-acquisition integration, it may be appropriate to reconcile the permits to match current operations.

Plant No. 2

The facility, Ohio EPA Premise Number 0855140359, has one active operating permit for the #20 silicone paper coater that expires December 11, 2006. The emission source is limited to 0.23 pounds of VOC per gallon of coating and emissions of 4.23 pounds of VOC per hour and 19.04 tons of VOC per year. Number 19 coater with flexographic printer and #17

coater, hot melt were issued registration operating permits on October 24, 1986 and November 28, 1986 respectively.

3.8 *POLYCHLORINATED BIPHENYLS (PCBS)*

ERM inspected the property for types of equipment that have been historically associated with the use of PCBs as a dielectric fluid coolant and stabilizer. It was indicated by Mr. Ron Klenk (Spinnaker) that no PCBs are currently present in electrical equipment or hydraulic oils at the subject properties.

Plant No. 1

Electrical vaults are present in the basement of Building No. 1A and the ground floor of Building No. 5. A total of 12 transformers are present. It is reported that the PCBs in the transformer oils were removed prior to 1983. Currently, it is reported that 11 of the transformers contain mineral oil, and one is a dry-type transformer. Records provided by Spinnaker indicate that in testing conducted in the late 1980s, the transformers all tested below at or below 24 parts per million (ppm), with most detected at less than 5 ppm. Outside, there are two pole-mounted transformers that are owned and operated by Dayton Power & Light.

Fluorescent lights are present in facility buildings. Based on the age of the buildings, it is possible that some of the light ballasts contain PCBs. Although disposal of fluorescent light ballasts is not regulated, best management practice would suggest that fluorescent light ballasts removed in bulk during remodeling or demolition be disposed of properly at a permitted facility. Currently, the light ballast and lamps are disposed along with other solid waste generated at the facility.

Plant No. 2

Based on the date of construction and an inspection of the subject property, no potential PCB-containing equipment was identified. A dry-type transformer was located outside, on the north side of the manufacturing building.

3.9 *VISUAL INDICATIONS OF ON-SITE CONTAMINATION*

Plant No. 1

No evidence of staining or sheens on standing water were identified on the grounds of the subject property. Most of the exterior grounds are paved, and no significant staining was identified on the paved exterior surfaces. Prior to the remedial efforts conducted at the subject property beginning in 1995, areas of staining and obvious releases were identified, but have since been addressed.

Staining was identified in numerous locations inside the Plant No. 1 buildings. For the most part, the areas of staining do not represent a material threat of a release to the environment because the staining occurs on upper or ground floors under which there are other floors or basements. In terms of visual indications in the basement or ground floors where there is no basement, staining was observed in several areas, include the following:

- Ink from flexographic printing operations in Building No. 1A has stained the walls, sink and concrete floor. The sink drains to the sanitary sewer system. Based on a review of the MSDS for the inks, this is not interpreted to represent a potential or material threat of a release to the environment.

- Staining of the concrete floor was observed around the transfer piping associated with the 6,000-gallon raw adhesive material storage tank located in Building No. 5. The adhesive is a water-based chemical and does not represent a potential or material threat of a release to the environment.

- Staining was observed on the floor in several of the drum storage areas. The staining was associated with general housekeeping and is not interpreted to represent a potential or material threat of a release to the environment.

- Staining was observed on the concrete floor under and around many of the coating lines, but the nature of the glues and coating materials are such that the conditions do not represent a potential or material threat of a release to the environment.

- Former hot melt glue mixing tanks (located in basement of Building No. 2) and associated concrete containment areas contained hardened glue and were stained. These conditions do not represent a potential or material threat of a release to the environment.

Plant No. 2

Significant staining was observed in the raw material bulk unloading and transfer areas. The staining was identified on concrete surfaces and on adjacent unpaved surfaces. Based on the nature of the raw materials unloaded in these areas (glue formulations), it is likely that these releases present a minimal risk to the environment. However, it cannot be conclusively demonstrated whether impacts are present in these areas.

No other areas of significant staining were identified in other exterior areas. No significant staining was identified on the surface of the concrete hazardous waste and drum storage area. The entire south side of the subject property is paved, and the west and north sides of the subject property are unpaved. No significant staining was observed in these areas.

Staining and spillage was in evidence around and under the coating lines, primarily related to silicone and adhesive/glue. Based on the nature of the materials, these areas do not represent a significant or material threat of a release to the environment. Significant staining was observed in the boiler room located on the north side of the building. Within the room are the transfer piping for the raw material offloading. The transfer piping is situated over a large sink. In addition, staining was observed on the floor around several drums that were stored in the room. The room also contains a "shower" where equipment is cleaned. The shower has a sump that drains to the sanitary sewer.

3.10 *ASBESTOS-CONTAINING MATERIALS*

Asbestos was banned in most friable building materials (sprayed applied surfacing materials and thermal system insulation) in 1978, but the Occupational Safety and Health Administration deems spray applied surfacing materials, thermal system insulation materials, and vinyl flooring materials as "presumed asbestos-containing materials" (PACMs) if they are present in pre-1980 buildings (Title 29 of the Code of Federal Regulations, Parts 1910.1001 and 1926.1101). Historical records indicate that the site building was constructed prior to 1980, and therefore the PACMs may have been used in building construction.

The OSHA PACM definition does not include all suspect asbestos-containing material (ACM). The use of ACMs as building materials, except in the case of friable surfacing materials and thermal system insulation, has not been prohibited. Building materials that are ACMs can

continue to be used. In 1989 the EPA published the Ban and Phase-Out Final Rule, allowing a 7-year period to prohibit the future manufacturing, importation, processing, and distribution in commerce of most ACMs. However, this rule was partially overturned in 1992, an action that allows the continued use of asbestos in a variety of products. Although less likely, asbestos can still be found in some present day building materials, including floor tile.

Under OSHA regulations building and/or facility owners are required to identify the presence, location, and quantity of ACMs in structures built prior to 1981 if construction, alteration, repair, maintenance, renovation, or custodial activities are performed. Building and/or facility owners are required to communicate the presence, location, and quantity of PACMs to facility employees or subcontractors and/or building tenants.

Plant No. 1

ERM obtained a copy of an asbestos survey of the building at 518 E. Water Street. The survey was performed by Environmental Enterprises, Inc. on behalf of Kimberly-Clark Corporation on 6 July, 1994. The survey included the Buildings 1A, 1, 2, 3, 4, and 5.

Based on the survey, a copy of which is presented in Appendix C, asbestos is present in the buildings at various locations. The majority of the ACMs identified were reported to be present within boiler room, bathrooms, and basement. Table 3 is a summary of the asbestos results.

Table 7. Asbestos Survey Summary for 518 E. Water Street

Type of ACM	Description and Location
Thermal System Insulation	*Building 1A – Ground Level, Second Level*
	Building 1 – Ground Level
	Building 2 – Ground Level, Second Level Mezzanine, Third Level, Fourth Level
	Building 3 – Ground Level,
Surfacing Material	*Building 2 – Ground and Fourth Levels acoustical ceiling plaster material*
Fire Door Insulation	*Building 1A – Basement Level, Second Level*
	Building 2 – Basement Level, Second Level Mezzanine, Third Level
	Building 4 – Boiler Room, Maintenance Shop
	Building 5 – Second Level
Miscellaneous Materials	*Transite Board – Building 3 Ground Level*
	Roofing Felt – Building 1A Roof
	Floor Tile – Building 2 Second Level Factory Conference Room Cage Area

During the inspection of the subject property, ERM observed blue and red tape or paint identifying the remaining ACMs.

Plant No. 2

The facility located at 130 Mary Bill Drive was constructed after 1980 and therefore the potential for the presence of ACMs is considered minimal. No comprehensive survey or sampling has been conducted to confirm the absence or presence of ACMs.

3.12 *WETLANDS*

No information on mapped wetlands was identified for either facility. No evidence of potential wetland areas was identified during the inspection of the subject properties.

3.13 *LEAD-CONTAINING MATERIALS*

In 1978 the Lead-Based Paint Poison Prevention Act (LBPPPA) banned the sale and use of lead-based paint. The Department of Housing and Urban Development (HUD) was later mandated under the Act to conduct complete inspections of all Public and Indian Housing Programs by 1994

and to create comprehensive and workable plans for abatement. The Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X) provides guidance on sampling, maximum safe levels in residences, abatement, and evaluation and control of LBP hazards. Title X indicates that a positive finding of lead content in a dry film of paint is 0.5 percent by weight (5,000 milligrams/kilograms).

ERM conducted a visual survey of accessible, painted surfaces at the subject property. These areas included interior and exterior architectural surfaces and fixtures. This type of survey should not be interpreted as a comprehensive evaluation of lead-based paint at the property. Painted interior and exterior surfaces were in fair overall condition with minor to significant peeling, chipping, and cracking. Based on the age of the painted surfaces, the paints could contain lead.

3.14 *OZONE DEPLETING SUBSTANCES*

Plant No. 1

The facility's use of ozone-depleting substances (ODS) is limited to comfort HVAC equipment in the office areas. HVAC maintenance, including that involving ODS, is performed by certified outside contractors. The contractors are required to provide the facility with information about the date, type of service, and amount of refrigerant added to these appliances containing in excess of 50 pounds of refrigerant. These records are maintained on site.

Plant No. 2

The facility's use of ozone-depleting substances (ODS) is limited to comfort HVAC equipment in the office and laboratory areas and two chillers used in the manufacturing process. The McQuay unit contains 300 pounds of R-22 and the Trane unit contains 62 pounds of R-22. HVAC maintenance, including that involving ODS, is performed by certified outside contractors. The contractors are required to provide the facility with information about the date, type of service, and amount of refrigerant added to these appliances containing in excess of 50 pounds of refrigerant. These records are maintained on site.

3.15 *RADIOACTIVE SOURCES AND RADON*

No radioactive sources were identified at either Spinnaker facility.

A radon gas survey was not conducted during this assessment. However, information supplied by Environmental Data Resources that was obtained from the U.S. Environmental Protection Agency (USEPA), indicates that the subject properties are located in Zone 1, where the predicted average indoor radon level is typically greater than 4 (pCi/L) picocuries per liter, with an average of 8 pCi/L in five sites that were tested. Radon mitigation measures are recommended by the USEPA when concentrations of radon exceed 4 pCi/L . Site-specific sampling has not been performed to evaluate the concentrations of radon within the building at the subject property.

Radon is a colorless, odorless gas that exists naturally in some geologic formations. According to the Colorado Department of Health Radiation Control Division, "radon gas can enter a home from the soil through dirt floors, cracks in concrete floors and walls, floor drains, sump pumps, water wells, joints, and tiny cracks or pores in hollow-block walls. Radon levels are generally highest in basements and ground-floor rooms in contact with the earth." Building products, especially cinder blocks made from material high in uranium and other alpha-emitting radionuclides, may release radon gas.

3.17 ENVIRONMENTAL MANAGEMENT SYSTEMS

No formal environmental management system is in place for Spinnaker. The personnel responsible for environmental matters at the facilities located in Troy, Ohio appeared motivated and concerned about environmental compliance.

4.0 *ASSESSMENT OF PAST LAND USE AND OPERATIONS*

4.1 *GENERAL INFORMATION*

Development of the subject property for Plant No. 1 (518 E. Water Street) is recorded as early as 1854. Since that time, the land has been used for industrial purposes. There is a long and significant history of site assessment, investigation and remediation, which is described below in detail.

For Plant No. 2 (130 Mary Bill Drive), the subject property remained undeveloped until the first phase of the manufacturing building was constructed in 1977. The adjacent 5-acre parcel remains undeveloped. Limited investigation and remediation was conducted at Plant No. 2 in conjunction with proposed and/or actual property transactions in 1993-94. A summary of past land use and operations in regard to Plant No. 2 is provided below.

4.2 *PREVIOUS ENVIRONMENTAL REPORTS/ CHRONOLOGY OF INVESTIGATIVE AND REMEDIAL EFFORTS*

ERM reviewed a number of reports and documents in regard to previous environmental studies completed at the subject properties. The documents reviewed, and summarized findings are presented below. Copies of pertinent site figures or documents are provided in Appendix D.

Plant No. 1

1. Internal Correspondence and Correspondence to the State Fire Marshal and Ohio EPA regarding USTs. 1987 – 1993.

USTs were removed and/or abandoned in place at Plant No. 1 in 1986 and 1988 by Kimberly-Clark. Information regarding the tank removals is provided in Section 3.4.2 of this report. Information that was reviewed indicated that a release was identified in regard to the former 3,000-gallon toluene tank located near the toluene recovery system. Additional sampling and analysis was conducted in regard to this tank, with eventual

remedial efforts being conducted in 1995 as part of the overall remediation for the subject property.

When the release from the toluene tank was reported to the Ohio EPA in 1989, it was also reported that a release of cooling tower blowdown water occurred, and that soil samples from the area of the release contained hexavalent chromium (concentrations not reported). The cooling tower is located in the northeast corner of Building No. 1A. The spill occurred in the area of the toluene recovery system. No documentation regarding the volume of soil removed or the results of confirmatory sampling, if conducted, were identified in the files.

2. *Phase I/ II Environmental Site Assessment - GZA Geoenvironmental, Inc. (GZA), October 1993 (conducted for IVEX – copy not available for review)*

3. *Site Investigations and Remediation Recommendations. Applied Engineering & Science, Inc.(AES) November 1993.*

- GZA work was conducted October 12–14, 1993 pursuant to potential purchase of assets by IVEX Coating, Inc. The document was not available for review, as the deal fell through due to Federal Trade Commission concerns. Applied Engineering & Science, Inc. (AES) was on site to split samples on behalf of Kimberly-Clark during first phase of the project

- AES completed a second phase of investigation on October 20–26, 1993 for Kimberly-Clark.

  Areas of concern identified included:

  - Bulk Storage Area - ASTs
  - Hazardous Waste Storage Pad
  - Former 400-gallon gasoline UST (east of hazardous waste storage)
  - Former 3,000-gallon fuel oil UST (shipping dock)
  - Closed 15,000-gallon fuel oil UST (under Building No. 2)
  - Toluene recovery system (east side of Building No. 1A)
  - Former 3,000-gallon toluene UST (toluene recovery system)
  - Non hazardous Waste Storage Area (west side of Building No. 5)
  - Spill tank (east parking lot gate)
  - Bulk unloading area (north side of Building No. 4)

- In-ground aeration tanks (northeast corner of Building No. 1A)

- Soil and groundwater samples were collected. Impacts were identified in soil and groundwater samples related to the following areas:
  - Bulk Storage Area – fuel oil and toluene related impacts (soil and groundwater)
    - Toluene (ND to 660 mg/kg for soil, ND to 320 mg/L for groundwater)
    - PAHs (max. 27 mg/kg in soil, max. 16 mg/L in groundwater)
    - Free-floating product near boring KCB3
    - TCE (ND to 51 μg/L)
    - 111 TCA (ND to 84 μg/kg in soil, ND to 270 μg/L in groundwater)
    - 11 DCA (ND to 120 μg/L)
    - chloroethane (ND to 120 μg/L)
    - Contaminants along north site of building likely related, in large part, to underground piping leaks
  - Non hazardous Waste Storage Area – VOCs (soil and groundwater)
    - TCE (ND to 53 mg/Kg in soil, ND to 400 μg/L)
    - PAHs (GP8 – 38 mg/Kg in soil)
    - Low concentrations – 111-TCA, 11 DCA, chloroethane, vinyl chloride, toluene, benzene
  - Former 3,000-gallon toluene UST – toluene (groundwater)
    - Toluene (GP6 – 260 mg/kg soil, KCB9 - 16 μg/L in groundwater)
    - Low concentrations of ethylbenzene, xylenes, TCE, 11-DCA, PAHs
  - In-ground aeration tank(s) – toluene (groundwater)

- Upgradient groundwater samples indicated the presence of TCE and PCE. An off-site source of these contaminants was suggested.

- AES provided recommendations for remediation and estimated costs for cleanup in report. Estimated costs totaled approximately $1,300,000.

4. Environmental and Occupational Safety and Health Assessment and Compliance Audit; Brown-Bridge Facilities; Troy, Ohio. 8 April 1994. ERM, Inc.

- Work conducted in preparation for possible sale of assets.
- Identified areas consistent with previous reports.
- No sampling and analysis conducted.
- Additional findings:
  - 1994 toluene spill (500 gallons) to soil from aboveground pump in SW corner of carbon adsorption solvent recovery system. The release was reported to the Ohio EPA. Approximately 74 cubic yards of soil were removed. Confirmatory samples indicated that impacts were removed (sample results <2.5 ppm toluene). The results were provided to Ohio EPA and the area was backfilled.
  - It was reported that PCBs in transformer oils were removed prior to 1983. PCBs in dielectric fluids removed from 3 capacitors were removed in 1987.
  - Solid waste incinerator and concrete-lined ash pit operated at Plant #1 – NW corner of Building No. 5. Reported that the incinerator only accepted paper trash, and that ash was sent off-site for disposal.

5. Soil Sampling Results, Hobart UST and Rail Spur Property, Brown-Bridge Facility, Troy, Ohio. June 1994. AES.

- The purpose of the investigation was to identify potential impacts to soil related to the 20,000-gallon fuel oil UST owned and operated by Hobart Cabinet and former railroad spur.
- Nine soil borings were drilled and soil samples were collected for laboratory analysis.
- No total petroleum hydrocarbons (TPH) detected. VOCs and PAHs identified in soil samples. TCE, PCE and breakdown products identified in samples. PAHs identified not indicative of fuel oil release. These contaminants could be migrating onto the subject property.

6. Phase II Report on the Subsurface Contamination on the Real Property known as Kimberly Clark; Brown Bridge Plant; Asbestos Survey;

Remediation Recommendations. July-August 1994. Environmental Enterprises, Inc.

- The work was conducted for a prospective purchaser (Brown Bridge Acquisition Corp – now DBA Spinnaker).
- The findings of the assessment were similar to previous reports.
- Remedial costs were estimated at $1,225,000.
- An asbestos survey was conducted by EEI. Asbestos-containing materials were identified. Provisions for selected abatement were built into the asset purchase agreement with the remaining liability for ACMs going to Spinnaker. A cost estimate to abate the ACMs was provided subsequent to this report.

7. Brown Bridge Acquisition Corporation (DBA as Spinnaker Coating) completes an asset purchase and property purchase, including subject property, from Kimberly-Clark.

Based on the results of the various investigations described above, an asset purchase agreement was structured and finalized in September 1994. As part of the agreement, Kimberly-Clark agreed to take responsibility for the cleanup at the subject property related to the releases identified in 1993-94. In summary, Kimberly-Clark assumed all liabilities, obligations and costs associated with these releases, up to a cap of $2,000,000. In addition, Kimberly-Clark agreed to pay for other losses that exceed $250,000 in aggregate, not to exceed a total of $3,000,000. The indemnification terminated on the third anniversary of the closing date (September 1997), with the exception of the following:

- Any loss or expense to which Spinnaker notified Kimberly-Clark of prior to the termination date;
- Any retained off-site liabilities; and,
- Continued costs up to $2,000,000 for the specified remediation at Plant No. 1.

8. Meetings with Ohio EPA to discuss Site Conditions and Proposed Remediation Strategy

No specific correspondence or meeting notes were available for review, but are assumed to be contained in Kimberly-Clark files. Based on the information reviewed, it is reported that Kimberly-Clark notified the Ohio

EPA of the releases, and approached the Ohio EPA in 1994 to discuss the strategy for addressing the reported releases. After a series of meetings and correspondence, the Ohio EPA claimed that staffing was not available to oversee the remedial efforts, but that remediation should be conducted voluntarily. These efforts preceded the establishment of the Ohio EPA Voluntary Action Program (VAP).

9. Removal of aboveground storage tanks, hazardous waste storage pad, and soil remediation

In Spring 1995, the ASTs located on the west side of the subject property (see Table 4) were removed, along with the former hazardous waste storage pad, non hazardous waste storage area, and underground reclaimed toluene line. During the removal efforts, contaminated soil was excavated. Although the remediation plan called for a biopile to be constructed, the actual soil remediation included the excavation and off-site disposal of approximately 800 cubic yards of impacted soil at a licensed hazardous waste facility.

10. Design and Installation of Remediation Systems

No reports were provided that described that remediation system that was installed in Spring 1995. Based on correspondence and information provided in subsequent reports, it is known that two systems were installed.

For the west end of the subject property, a groundwater pump and treat system was installed, that included four groundwater recovery wells. A treatment building was installed to house a water collection tank with oil skimming, controls and recording equipment, and an air stripper. Initially, exhaust from the air stripper was filtered through carbon canister prior to discharge to the atmosphere. The system pumped at a rate of 15 to 20 gallons per minute (gpm). After four months of monitoring air emission concentrations, it was determined that the canisters were not required to meet the applicable air permitting limits. This system was designed to remediate groundwater impacts related to releases of VOCs and semivolatile compounds in regard to contaminants released from the former fuel oil ASTs and the former hazardous waste, chemical storage and nonhazardous waste storage areas. A permit was obtained to discharge the treated effluent to the City of Troy publicly-owned treatment works (POTW).

For the east end of the subject property, a soil vapor extraction (SVE)/air sparging system was installed, consisting of four air injection wells and

five vapor extraction wells. The system was designed to remediate toluene impacts to soil and groundwater related to releases from the former toluene UST and the former aeration system.

11. Operation and Maintenance of the Remediation Systems and Progress Reporting to Ohio EPA (1995 – 1997)

Both remediation systems began operation in August 1995. Monthly and/or quarterly monitoring of the systems was conducted, and reports were provided to the Ohio EPA. Copies of these reports were not available for review, and it is again assumed that Kimberly-Clark has maintained files in this regard.

Subsequent reports that were available for review indicate that significant progress was made in the remediation of both areas between 1995 and 1997. In 1996, groundwater monitoring results indicated that the contaminant plume had been reduced in size, and the extraction well located furthest to the west was replaced by a well located closer to the center of the groundwater contaminant plume.

Quarterly sampling and analysis for groundwater monitoring wells located on the east end of the subject property indicated that the cleanup goals had been met in February 1997. As a result, the air sparging system was shut down in March 1997. The vapor extraction system was shut down in January 1998. Operation and monitoring of the groundwater remediation on the west end of the subject property continued.

In 1997, Kimberly-Clark applied for and obtained a NPDES permit to discharge the treated effluent to the Great Miami River (Permit No. 1IN00260). The effluent is monitored for selected chemical parameters including VOCs and polynuclear aromatic hydrocarbons (PAHs).

12. Contamination Identified in City of Troy Supply Wells

Records indicate that VOCs have been detected in selected supply wells for the City of Troy on a periodic basis, specifically Well 18. The supply wells in question are located north of the Great Miami River, with Wells 14 and 18 being located about 900 feet and 1,200 feet east/northeast of the subject property, respectively.

The date of the first detection was not identified in the records reviewed. The contaminants of concern were primarily related to halogenated VOCs, specifically cis 1,2-dichloroethene (cis 1,2-DCE) in Well 18. The cis 1,2-DCE has been detected at relatively low concentrations (average of 0.7

micrograms per Liter [$\mu g/L$]), which is two orders of magnitude below the Maximum Contaminant Level for Drinking Water (MCL) of 70 $\mu g/L$.

During Summer 1997, the Ohio EPA retained Earth Tech, Inc. to conduct an investigation in the City of Troy to identify possible sources for the VOCs identified in the supply wells. A total of 43 borings were drilled during the investigation using either a Hurricane or Geoprobe® drilling rig. The results of the investigation were documented in a December 1997 report, as summarized below.

- There are 8 active supply wells located in the City of Troy well field, pumping an average of 3.5 million gallons per day. The wells are installed in the buried valley outwash deposits (3.5 miles wide and 290 feet deep in the Troy area) that consist primarily of sand and gravel, at depths of 110 to 180 feet below grade. Locally thick layers of glacial till (clay) are interbedded with the outwash deposits.

- In 1991, tetrachloroethene (PCE) was detected in Well 12W at a concentration of 3.3 $\mu g/L$ (upgradient [west] of the subject property).

- In 1995, PCE and 1,1,1-trichloroethane were detected in groundwater samples collected at Wampler Buick (approximately one mile upgradient [west/northwest] of the subject property).

- A total of seven borings were drilled on the Hobart Cabinet property, located immediately west of the subject property. The following contaminants (maximum concentrations reported) were identified in the groundwater samples:
  - PCE 3.4 $\mu g/L$
  - TCE 23 $\mu g/L$
  - Cis 1,2-DCE 22.4 $\mu g/L$
  - Trans 1,2-DCE 0.8 $\mu g/L$
  - Benzene 0.9 $\mu g/L$
  - Toluene 1.3 $\mu g/L$
  - Naphthalene 10.4 $\mu g/L$

- One boring was drilled on the east side of the subject property, and yielded the following results:
  - TCE 0.8 $\mu g/L$
  - Cis 1,2-DCE 9.1 $\mu g/L$

- Toluene 0.9 $\mu g/L$

- Based on information provided in correspondence and notes in the files, the Ohio EPA has focused their attention on Wampler Buick and the subject property as potential sources of the VOCs detected in the City of Troy wells. It does not appear that much attention has been given to the Hobart Cabinet property, although this could not be confirmed in the information reviewed.

13. Ohio EPA Enforcement at the Subject Property (1997 – 98)

- 22 July 1997 - The Director of the Ohio EPA sent a Director's Final Findings and Orders (DFF&O) to both Kimberly –Clark and Spinnaker requiring a remedial investigation/feasibility study (RI/FS) for the subject property.

- Both Kimberly-Clark and Spinnaker responded to the DFF&O by providing information regarding its initial meetings with the Ohio EPA in 1994-95, and the status of the remedial efforts that had been conducted at the subject property.

- 8 September 1997 - The Ohio EPA sent a response to comments on the proposed DFF&O indicating that although voluntary cleanup was recommended, that did not infer Ohio EPA's consent in regard to the remedial work, and that a DFF&O was still required.

- 17 November 1997 - The Ohio EPA, Division of Emergency and Remedial Response (DERR) sent a letter with specific questions about the cleanup at the subject property.

- 16 July 1998 - A conference call between Ohio EPA, Kimberly-Clark and Spinnaker was held to negotiate the terms of the DFF&O. the Ohio EPA proposed an order containing provisions for continued operation and maintenance (O&M) of the groundwater remediation system and groundwater monitoring.

- 15 October 1998 - The Ohio EPA sent a letter indicating that the O&M and monitoring was a one-time offer for an interim-action type order.

- The DFF&O was never issued final, nor was it signed.

14. Continued O&M and Groundwater Monitoring at Subject Property

Even though the DFF&O was never finalized, Kimberly-Clark continued to operate the groundwater remediation system on the west end of the

subject property, and conducted quarterly groundwater monitoring. Contaminant levels in groundwater samples continued to show progress toward reaching the cleanup goals for the subject property.

In 1999-2000 the cleanup goals for TCE and vinyl chloride, which had been the most persistent chemicals detected above the cleanup goals, were reached. Even as the VOC concentrations in the suspected release areas on the west and north portions of the subject property continued to decline, VOCs were identified at increasing concentrations in upgradient monitoring wells (PCE and TCE). It was suggested that these contaminants were migrating onto the subject property from an upgradient source.

15. Aquifer Pumping Test – ARCADIS Geraghty & Miller. July 1999

On 2 through 7 July 1999, ARCADIS Geraghty & Miller conducted an aquifer pumping test. The purpose of the pumping test was to determine the influence on the shallow monitoring wells on the subject property in response to: 1) pumping of the on-site production wells; 2) pumping of the City of Troy Well 18; and, 3) recharge from the Great Miami River. The results of the pumping test can be summarized as follow:

- Drawdown (showing influence from pumping) was observed, at a maximum of 0.05 feet, in on-site groundwater monitoring wells during pumping of City Well 18. The influence was greater in the wells located on the east side of the subject property than those on the west side were.

- Drawdown was observed in the on-site monitoring wells in response to pumping of the on-site water supply wells. Drawdown observed was approximately five to six times greater than that observed in regard to pumping of the City Well 18, even though the pumping rate for the City Well 18 was approximately eight time greater.

- When no pumping was occurring, water levels in the monitoring wells showed that recharge from the Great Miami River to the upper sand and gravel unit does occur.

16. Continued Ohio EPA Investigation of Contamination in City of Troy Well Field

During 1999, correspondence was directed between the Ohio EPA, Spinnaker and Kimberly-Clark regarding the cis 1,2-DCE identified in the City of Troy Well 18. The Ohio EPA remained convinced, and provided arguments, that the contamination source was the subject property. A

technical expert with ARCADIS Geraghty & Miller was retained to respond to the Ohio EPA on behalf of Spinnaker. The arguments put forth by Spinnaker indicated that the contaminants were not emanating from the subject property because:

- A confining layer of clay till was identified at depths below the saturated shallow sand and gravel where the VOCs were detected in the groundwater.

- The on-site water supply well is likely completed in a lower sand and gravel unit, based on yield and pumping rate (110 gpm), and no VOCs had ever been detected in water samples collected from the well. The influence of pumping on the shallow monitoring wells indicates that groundwater would tend to migrate toward this well versus the City of Troy wells.

17. Integrated Assessment Report; East Troy Contaminated Aquifer, Troy, Miami County, Ohio. Prepared by IT Corporation on behalf of the Ohio EPA. 30 June 2000.

In May 2000, the Ohio EPA retained IT Corporation to conduct a drilling and sampling program to gather additional water quality information in regard to the contamination identified in the City of Troy well field. Several borings were drilled using the Rotasonic drilling method. Groundwater samples were collected at depths of 20, 30 and 40 feet below grade in an effort to determine if VOC impacts were present in deeper portions of the aquifer. In addition, groundwater samples were collected from the on-site monitoring and remediation pumping wells. VOCs were again identified in most of the wells.

With the exception of boring RS06, contaminants were not found in the deeper portions of the aquifer. At RS06, cis 1,2-DCE, the primary contaminant of concern, was identified in deeper samples at concentrations of 8.7 and 4.3 $\mu g/L$, respectively. VOCs were detected in many of the shallow samples. The detected contaminants were related to releases of TCE, PCE, 1,1,1-trichloroethane, and toluene.

Kimberly-Clark has consistently argued that the PCE is coming from an off-site source. However, PCE was highest in a rotosonic boring (RS03) drilled just downgradient (east/northeast) of the former nonhazardous waste storage area, where documented releases of VOCs have occurred. PCE was detected in upgradient samples at concentrations of 19, 23 and 14 $\mu g/L$ to the west and south of the suspected release areas. In addition,

PCE was detected in upgradient well on the southern portion of the east side of the subject property.

There was no documented evidence of TCE or PCE use on the subject property in the information provided, although all parties involved concede that the use of one or both of these solvents was possible or probable.

18. Site Closure Report, Former Brown-Bridge Facility, Troy, Ohio. Steve McFadden. February 2001.

In February 2001, Mr. Steve McFadden submitted a *Site Closure Report* to the Ohio EPA on behalf of Kimberly-Clark. The report summarized the remedial efforts for the west and east ends of the subject property and provided a summary of operation, maintenance and monitoring results. The report concludes that the remediation was deemed complete based on the following:

- The toluene impacts in groundwater on the east end of the subject property were reduced to below applicable cleanup levels.
- The TCE and vinyl chloride concentrations (contended to be the only constituents of concern) were reduced to within acceptable statistical levels that were below the cleanup levels.
- The remaining VOC contamination is related to an off-site source of groundwater contamination that is migrating onto the subject property.

19. Ohio EPA submits letter to Kimberly-Clark requesting that System remain in operation. 27 February 2001.

20. Kimberly-Clark shuts the groundwater pump and treat system down. 1 March 2001.

21. Directors Final Findings & Orders. 13 March 2001. Ohio EPA.

In response to the *Site Closure Report,* and shutting down of the groundwater remediation system, the Ohio EPA issued a DFF&O requiring Kimberly-Clark to conduct the following:

- Re-start the groundwater remediation system and continue O&M and monitoring until Interim Action Groundwater Concentrations are met and confirmed by Ohio EPA.

- Develop a work plan to evaluate the effectiveness of the current groundwater remediation system on the west end of the subject property. Submit a plan to do so within 45 days of the issuance of the DFF&O. Work to include an evaluation of the aquifer system.

- Implement the work plan upon approval by the Ohio EPA.

- Collect water-level measurements and conduct groundwater monitoring on a quarterly basis for analysis of VOCs.

- Once IAGWC standards are met, shut the system down, but remain operational, and continue monitoring groundwater until 8 consecutive quarters of groundwater sampling and analysis demonstrate compliance with the IAGWC standards.

22. Kimberly-Clark restarted the groundwater remediation system.

23. Final Remediation Work Plan, Spinnaker Facility, Troy, Ohio. Steve McFadden. May 2001.

In response to the issuance of the DFF&O, Steve McFadden, on behalf of Kimberly-Clark, submitted a work plan to optimize the effectiveness of the groundwater remediation system. The work plan included the use of *in situ* oxidation to accelerate the cleanup.

Representatives from the Ohio EPA, Kimberly-Clark and Spinnaker met at the subject property in June 2001 to discuss the work plan and evaluated its viability. No agreement was reached between the parties. It is reported that Kimberly-Clark has since submitted an appeal to the Environmental Review Appeals Commission (ERAC). The issue remains open.

Plant No. 2

1. Site Investigations and Remediation Recommendations. Applied Engineering & Science, Inc.(AES) November 1993.

The subsurface investigation at Plant No. 2 was conducted in concert with the investigation conducted at Plant No. 1 in October 1993. The work was conducted for Kimberly-Clark. Four soil borings were drilled at the subject property: one background sample (B-1), one sample near the transformer on the north side of the building (T-PAD); one boring on the west side of the raw material offloading area (B-3); and, one boring adjacent to the drum storage pad (B-2). Soil and groundwater samples

were collected from each of the borings, except for the T-PAD boring. Analytical results indicated that "trace" concentrations of VOCs were present in each of the soil samples and in the groundwater sample collected from boring B-1. 1,1,1-trichloroethane was detected in the water sample collected from boring B-2 at a concentration of 79 $\mu g/L$, and 1,1-dichloroethane was detected at a concentration of 15 $\mu g/L$.

Soil was removed from either side of the truck bulk unloading area on the northern side of the building.

4.3 *EVALUATION OF HISTORIC INFORMATION SOURCES*

To determine past uses of the subject properties and surrounding properties, ERM reviewed historical sources of information as outlined below. Copies of the Sanborn maps, topographic maps, city directory search, telephone interview records, as applicable, for Plant Nos. 1 and 2 are presented in Appendices E and F, respectively.

Table 8. ***Summary of Historical Records Reviewed – Plant No. 1***

	Years Reviewed	
Source of Information	*Subject Property*	*Adjacent Properties*
Interview(s)	Mr. Ron Klenk (Spinnaker)	
Sanborn Fire Insurance Company Map(s)	1898, 1905, 1911, 1923, 1931, 1947, 1955	1887, 1892, 1898, 1905, 1911, 1923, 1931, 1947, 1955
USGS Topographic Map(s)	1961, 1972, 1982, 1984	1961, 1972, 1982, 1984
Local Planning Map(s)	Year(s)	year(s)
City Directories (organized by address)	1980, 1985, 1990, 1995, 1999	1980, 1985, 1990, 1995, 1999
Aerial Photograph(s)*	Not readily available	Not readily available
50-year Chain-of-Title	Not reviewed	Not reviewed
Other:	Year(s)	year(s)

Table 9. *Summary of Historical Records Reviewed – Plant No. 2*

	Years Reviewed	
Source of Information	*Subject Property*	*Adjacent Properties*
Interview(s)	Mr. Ron Klenk (Spinnaker) Mr. Jim Bowell (Fire Inspector) Mr. Aloka Roy (Zoning Technician)	
Sanborn Fire Insurance Company Map(s)	Not Available	Not Available
USGS Topographic Map(s)	1961, 1972, 1982, 1984	1961, 1972, 1982, 1984
Local Planning Map(s)	Not reviewed	Not reviewed
City Directories (organized by address)	No listings	1980, 1985, 1990, 1995, 1999
Aerial Photograph(s)*	Not readily available	Not readily available
50-year Chain-of-Title	Not reviewed	Not reviewed
Other:	Year(s)	year(s)

Subject Property

Plant No. 1

The subject property has a long history of development dating back to the mid-1850's. The earliest records of property use reviewed were Sanborn Fire Insurance Maps (Sanborns), dating back to 1898. The first recorded use of the subject property, albeit a smaller parcel, shows the property in use as Hayner's Whiskey Distillery. Information identified in previous reports dates property development even further back to 1854, with reported use as a brick storage yard. This original building is what is now called Building No. 3. Other parcels that are now part of the subject parcel included domestic residences on either side (east and west) of the distillery. The Hayner's Distillery "rectifying building" was located west of the residence immediately adjacent to the west of the main distillery building. Land on the northern and northwestern portions of what is now the subject property was undeveloped.

The Sanborns for 1905 shows the main distillery building at about one-third of the size of the building in 1898. The residences were still noted on either side of the building. The "rectifying building" noted in 1898 was now labeled "vacant".

Although information contained in several reports reviewed by ERM indicated that a train derailment in 1911 destroyed or damaged a significant portion of the building, this appears to conflict with information on the 1911 Sanborn and earlier Sanborns that do not show a railroad spur adjacent to the subject property. The main Hayner's Distillery operation was located west of the subject property, and was immediately adjacent to a rail line. It could be that this was the facility affected by the derailment. Residences were still in evidence both east and west of the building, and property development had not occurred on the north side of what is now the subject property.

Although it is reported that in 1912 there was an addition of 14,200 square feet (Building No. 2), the information on the Sanborns actually indicates that this was re-building the operation back to about the size of the building that was present in 1898. A slight westward block on the building, although not legible, is thought to represent the former incinerator. Site plans produced in 1957 appear to support this, showing this area as the exact location of the former incinerator.

Around 1922, information indicates that the distillery was shut down. No changes from the 1911 Sanborn were identified, and no other records indicate a significant change in property use and/or development.

Information contained in previous environmental reports indicated that in 1928, the Brown-Bridge Paper Company began operation at the subject property. Expansion to the existing buildings occurred in 1946, with the addition of Building No. 1 (25,000 square feet). That expansion to the east enveloped what had been six residences and/or small buildings. In addition, the residence present in 1931 to east of the main building was no longer present. Evidence of the railroad spur was identified in the 1947 Sanborn, along the north side of the buildings. A small building toward the southwest side of the subject property was identified as "miscellaneous storage".

A small addition (Building No. 4) was made in 1951. In 1955, the Sanborn and facility drawings indicate that Building No. 1A was added to the east of the existing buildings (45,000 square feet). Both the 1955 Sanborn and 1957 facility drawings clearly show the railroad siding (2 spurs). The longest spur extended along the length of the buildings to the east side of Building No. 1A. No significant changes were noted in other areas of what is now the subject property. A small building was located on the southwest side of the subject property, called the "white house". The former use of this building is not known.

In 1968, an additional 17,300 square feet were added to the west of the existing buildings (Building No. 5). The "white house" was no longer present.

In 1971, Kimberly-Clark purchased the assets of Brown Bridge Industries, including the subject property.

Plant No. 2

Title search information indicated a property transfer on 6 May 1911 from J.H. Landis to the Miami County Growth Corporation. Information provided by Mr. Ron Klenk and facility records indicated that the facility was initially developed in 1978. Title search information indicated that Kimberly-Clark acquired the property on 30 June 1978 from the Miami County Growth Corporation. The initial building was about 50,000 square feet. The building was doubled in size in 1985-6, to bring the total square footage under roof to 100,000 square feet.

Adjacent Properties and Surrounding Area

Plant No. 1

The area surrounding the subject property was mixed commercial, industrial, and residential during the late 1800s until the present day.

Sensitive Receptors to Contamination

Present throughout much or all of the history of operation at the subject property, the following sensitive receptors were identified:

- Van Cleve School (former high school, now an elementary school) located immediately south of the subject property, south of E. Water Street.
- St. Patrick's Church and school located south/southeast of the subject property;
- Residential properties located immediately east and west of the subject property;
- The Great Miami River, located immediately north of the subject property; and,

- The City of Troy public water supply well field, located immediately north of the Great Miami River, and north/north west of the subject property.

Potential Sources of Off-Site Contamination

The following properties were present between the late 1800's and the present day, and present a potential for contamination migrating toward or onto the subject property:

- Miami Valley Gas and Fuel Co. (FKA Troy Gas Works) This facility was located immediately west of the far northwest corner of the west parking lot for the subject property. This facility was a manufactured gas plant (MGP) facility that included a large gas holder. The site was in evidence on Sanborns from 1887 to 1905. MGP sites are well-known sources of legacy contamination, primarily related to coal tar and PAHs. Dense non-aqueous phase (DNAPL) liquids are often discovered in regard to releases from these facilities. This facility was located hydraulically upgradient of the subject property.

- Hobart Cabinet – This facility was established around 1907 on property that included the former MGP facility. The facility is known to use chlorinated solvents, and halogenated VOCs, among other contaminants, were identified in soil and groundwater samples collected on the Hobart property.

- Waltzs Cleaners – This facility was a dry cleaning operation. The dates of operation were not able to be identified, but the facility is now closed. This facility is located less than one-eighth mile south (upgradient) of the subject property. Dry cleaning operations used PCE as the predominant solvent of choice. This contaminant, and its breakdown products, have been identified in upgradient wells located on the subject property.

Plant No. 2

Current land use in the vicinity of the subject property is mixed commercial and light industrial. Prior to 1972, the land in the vicinity of the subject property was undeveloped. The 1982 historical topographic map indicates that construction of a road and several buildings occurred between 1972 and 1982. The Troy Daily News building is located to the north of the subject property. An American Electric Power (AEP) maintenance facility is located to the east of the subject property. Roconex is located immediately south of the subject property. Undeveloped land is

located west of the subject property. Ace abrasives is located further south and east of the subject property.

5.0 *DATABASE AND GOVERNMENT RECORDS REVIEW*

5.1 *GOVERNMENT RECORDS REVIEW/ INTERVIEWS*

Plant No. 1

No interviews with government official were conducted in regard to Plant No. 1. Significant agency correspondence was reviewed in files provided by Spinnaker, primarily in regard to the various tank closures and releases identified at the subject property.

Plant No. 2

ERM retained Environmental Data Resources, Inc. (EDR) to conduct telephone interviews in regard to the subject property.

Mr. Jim Bowell, a fire inspector with the City of Troy was contacted. He stated that in 1978, two fuel oil underground storage tanks were installed, and were subsequently removed in 1988. He did not have any record of any fires or spills at the subject property for which the fire department was called.

Mr. Aloka Roy, a zoning technician with the City of Troy was contacted. He stated that the subject property is zoned M-2 Industrial, and that the surrounding properties are also zoned industrial. Public sewer serves the subject property.

5.2 *ENVIRONMENTAL DATABASE SEARCH*

ERM contracted EDR to conduct a database search for agency records. The reports for Plant Nos. 1 and 2, presented in Appendices G and H, respectively, define and summarize the ASTM databases reviewed in the EDR reports and notes if any sites (including the subject properties) were identified in the specified radius.

It should be noted that the computerized geocoding technology used in the database search is based on available census data and is only accurate to approximately ±300 feet. The EDR report provides a list of unmapped sites for which inadequate location information was provided. ERM has reviewed the list of "unmapped" sites to determine if these sites are

within the study radius. If the "unmapped" sites appeared likely to be within the search radius for a specific database, they are discussed in the sections that follow.

Based on maps of the area, the required database search radius for a given database, and the site reconnaissance, it appears that none of the orphan sites are within the designated search distances for each database.

Sites identified within the study radii were evaluated to determine if they are likely to have adversely impacted the subject properties. The criteria used to evaluate the potential for adverse impact to the subject properties include:

- distance from the subject property,
- expected depth and direction of ground water and surface water flow,
- expected storm water flow direction, and
- the presence/absence of documented contaminant releases at the identified sites that have not been remedied to the satisfaction of regulators.

The identification of a site as potentially upgradient or downgradient is based on the expected direction of ground water flow to the north/northeast for Plant No. 1, and to the east for Plant No. 2.

Plant No. 1 – 518 E. Water Street

The subject property located at 518 E. Water Street in Troy, Ohio was identified on the following data bases: CORRACTS, RCRIS – TSD and Large Quantity Generator, FINDS, DERR, and SPILLS.

- CORRACTS: This database identifies hazardous waste handlers with RCRA corrective action activity. The entire facility was identified for corrective action activities but was assigned a low corrective action priority in July 1992.
- RCRIS: The subject property was identified in the RCRA Large Quantity Generator (LQG) database and the RCRA Treatment, Storage, and/or Disposal Facility (TSDF) database. During 1999, the facility generated D001 waste (2,211 lbs.), D039 waste (43 lbs.), F003 waste (1,804 lbs.), and F005 waste (2,201 lbs.). TSDF activities were not reported. Three violation records were reported for the site; areas of

violations included Generator – all requirements, TSD – other requirements, and TSD – closure/post closure requirements. All violations were assigned a low priority and have been abated.

- FINDS: This EPA database identifies facility information and sources that provide additional detail for the subject property. The facility was identified in the Aerometric Information Retrieval System (AIRS), Biennial Reporting System (BRS), Facility Registry System (FRS), Ohio Core database (OH_CORE), Permit Compliance System (PCS), Resource Conservation and Recovery Act Information system (RCRAINFO), and Toxic Chemical Release Inventory System (TRIS).

- DERR: The subject property was identified in the Ohio EPA Division of Emergency and Remedial Response's database. This database identifies facilities that may or may not have contamination. No additional information was provided for the subject property.

- SPILLS: The subject property was identified in the Ohio EPA Emergency Response Database which contains all reported incidents, spills, or releases to the environment. A release incident to the air was reported at the subject property on May 22, 1998. The size and material of the release was not reported; the priority of the incident was low ("respond when possible or convenient"). A second release incident of waste water (non-contact cooling water and service water) was reported at the subject property on May 28, 1998 to the Great Miami River. The size of the release was unknown and the assigned priority for the incident was "no response by Emergency Response."

Properties Surrounding Plant No.1 (518 E. Water Street)

No immediately surrounding properties were identified within the specified search radii in EDR's search of the following databases: National Priority List (NPL); Proposed NPL; Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS); CERCLIS No Further Remedial Action Planned (NFRAP); CORRACTS; RCRIS TSD and LQG; State Landfill; Underground Storage Tank File (UST); Superfund Consent Decrees (CONSENT); Records of Decision (ROD); Delisted NPL; and Mines Master Index File (MINES).

Sites identified in EDR's review of other databases are summarized in Table 10.

Table 10. Sites Surrounding 518 E. Water Street Identified in EDR Report

Database	Radius searched	Sites Found
Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) No Further Remedial Action Planned (NFRAP) Compilation by the EPA of sites at which No Further Remedial Action is Planned for a site where a hazardous substance had been stored or disposed.	1.0 mile	1
Resource Conservation and Recovery Information System (RCRIS) Small Quantity Generators Facilities that are regulated based on current hazardous waste generation management activities.	0.25 mile	3
State Hazardous Waste Sites This database identifies state hazardous waste sites planned for cleanup paid by state funds or by potentially responsible parties.	1.0 mile	6
Leaking Underground Storage Tank Sites (LUST) List of closed or unremediated reported leaking underground storage tanks.	0.5 mile	10
Former Manufactured Gas Sites (Coal Gas) Database identifies historical manufactured gas sites that are no longer in use.	1.0 mile	1

Based on Table 2, several sites of concern have been identified in the vicinity of the subject property located at 518 E. Water Street. The number and type of sites identified is consistent with the development of the surrounding area. The database indicates that there are many regulated sites in the vicinity of the subject property.

Based on ERM's review of the database findings for vicinity sites, an adverse impact to the subject property from the Hobart Cabinet Co., former Troy Gas Co., and/or Waltzs Cleaners could have occurred, although no evidence of violations or releases was identified in the databases. Each of these sites is located hydraulically upgradient of the subject property.

- Hobart Cabinet Co. The facility is located immediately west of the subject property, and was listed on the RCRIS and FINDS databases as a small quantity generator of hazardous waste. No violations were identified.

- Troy Gas Co. This facility was located on what is now the Hobart Cabinet Co. property, and may have extended onto the far

northwestern portion of the west parking lot for the subject property. This facility was listed beginning in 1887 in the Coal Gas database. Name was changed to Miami Valley Gas and Fuel Co. in 1898. The facility was not in operation in 1905.

- Troy Well Field The City of Troy water supply well field is located immediately north of the Great Miami River, north/northeast of the subject property. The closest supply wells are located approximately 900 feet from the subject property. This facility was listed in the SHWS and DERR databases for contaminated water supply from an unknown source.

- Miami Shores Golf Course The golf course is located within the water supply well field. The facility was listed in the LUST database for the closure of six USTs. A No Further Action letter was issued for the USTs.

- Waltzs Cleaners This facility is located about one-eighth mile south of the subject property, and was listed on the RCRIS-SQG and FINDS databases. No violations were reported for this facility.

Plant No. 2 – 130 Mary Bill Drive

The subject property located at 130 Mary Bill Drive in Troy, Ohio was identified on the RCRIS database as a RCRA large quantity generator. During 1999, reported wastes generated included waste D001 (466 lbs.) and waste D039 (65 lbs.). No violations were found for the subject property. The FINDS database also identified the subject property at 130 Mary Bill Drive in the following systems/databases: AIRS Facility System, BRS, FRS, OH_CORE, RCRAINFO, and TRIS. No additional information was identified or found for the subject property.

Properties Surrounding 130 Mary Bill Drive

Sites in the vicinity of the subject property were identified in the databases and on Table 11.

Table 11. Sites Surrounding 130 Mary Bill Drive Identified in EDR Report

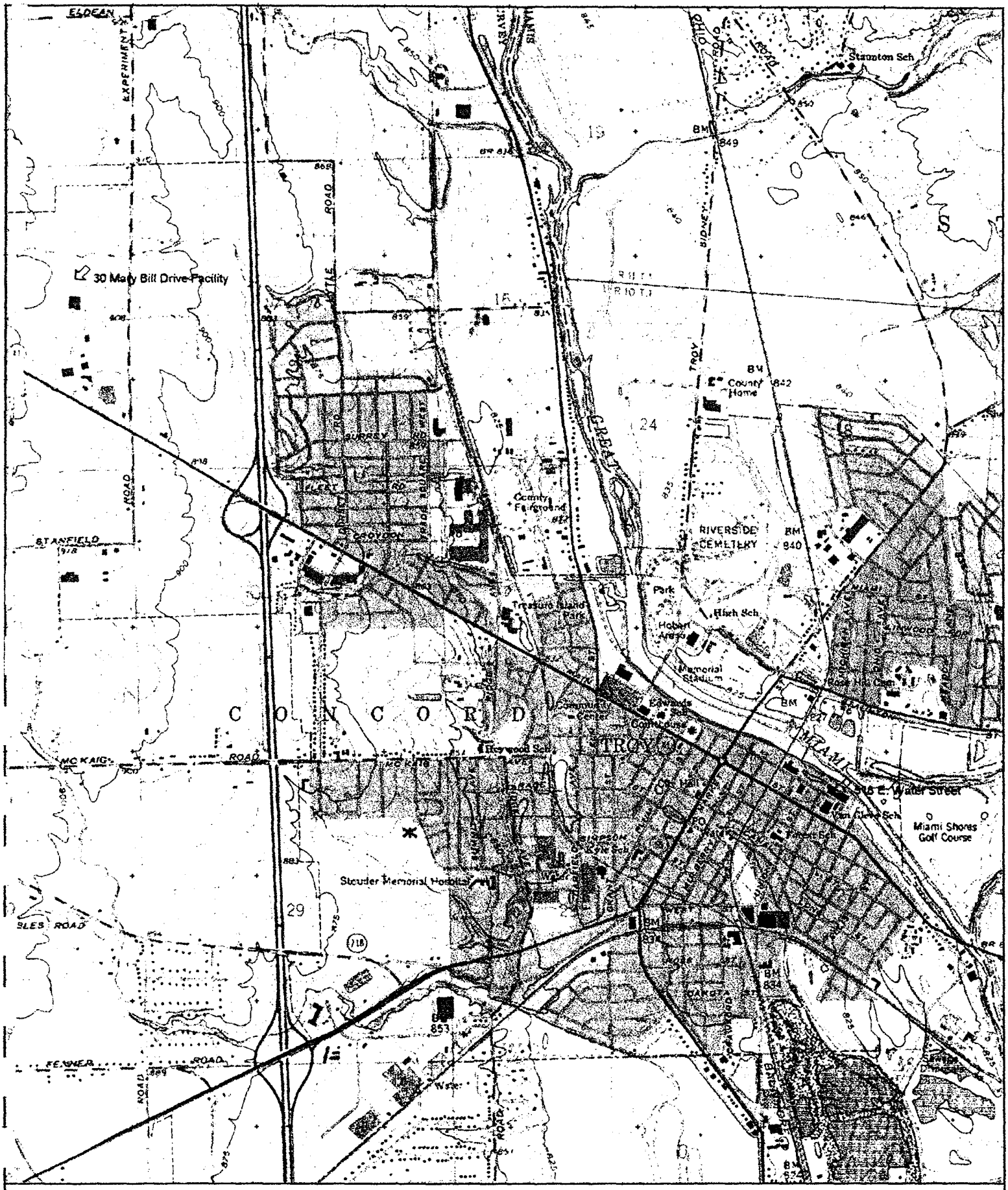
Database	Radius searched	Sites Found
Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) No Further Remedial Action Planned (NFRAP) Compilation by the EPA of sites at which No Further Remedial Action is Planned for a site where a hazardous substance had been stored or disposed.	0.25 mile	1
Resource Conservation and Recovery Information System (RCRIS) Small Quantity Generators Facilities that are regulated based on current hazardous waste generation management activities.	0.25 mile	5
State Hazardous Waste Sites This database identifies state hazardous waste sites planned for cleanup paid by state funds or by potentially responsible parties	1.0 mile	1
Leaking Underground Storage Tank Sites (LUST) List of closed or unremediated reported leaking underground storage tanks	0.5 mile	2
Underground Storage Tank Sites (UST) List of sites with registered underground storage tanks..	0.25 mile	1

Based on Table 3, several sites of concern have been identified in the vicinity of the subject property located at 130 Mary Bill Drive. The number and type of sites identified is consistent with the development of the surrounding area. The database indicates that there are many regulated sites in the vicinity of the subject property.

Based on ERM's review of the database findings for vicinity sites, an adverse impact to the subject property from vicinity sites is not expected. No impact is expected because the identified vicinity sites are in expected down- or cross-gradient locations, the sites have been remedied to the satisfaction of regulators, and no releases to the subsurface have been reported.

6.0 *QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONAL CONDUCTING THIS ASSESSMENT*

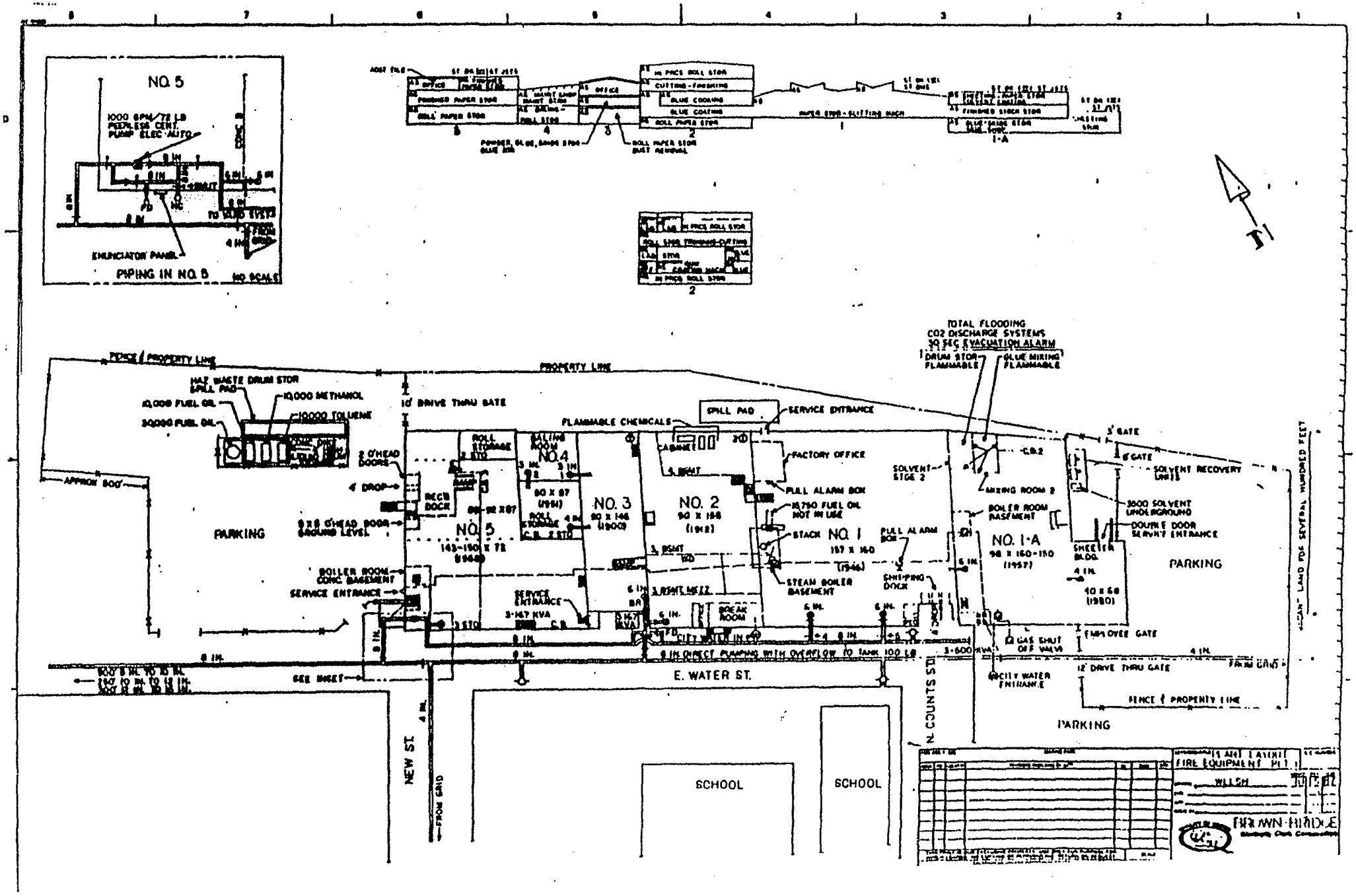
Daniel W. Longbrake and Leigh Anne Sievert, of ERM's Columbus, Ohio office conducted this assessment. Dennis P. Shelly, P.E. of ERM'sNew York City office reviewed the contents of this report. The professional qualifications for Mr. Longbrake, Ms. Sievert and Mr. Shelly are included in Appendix I.

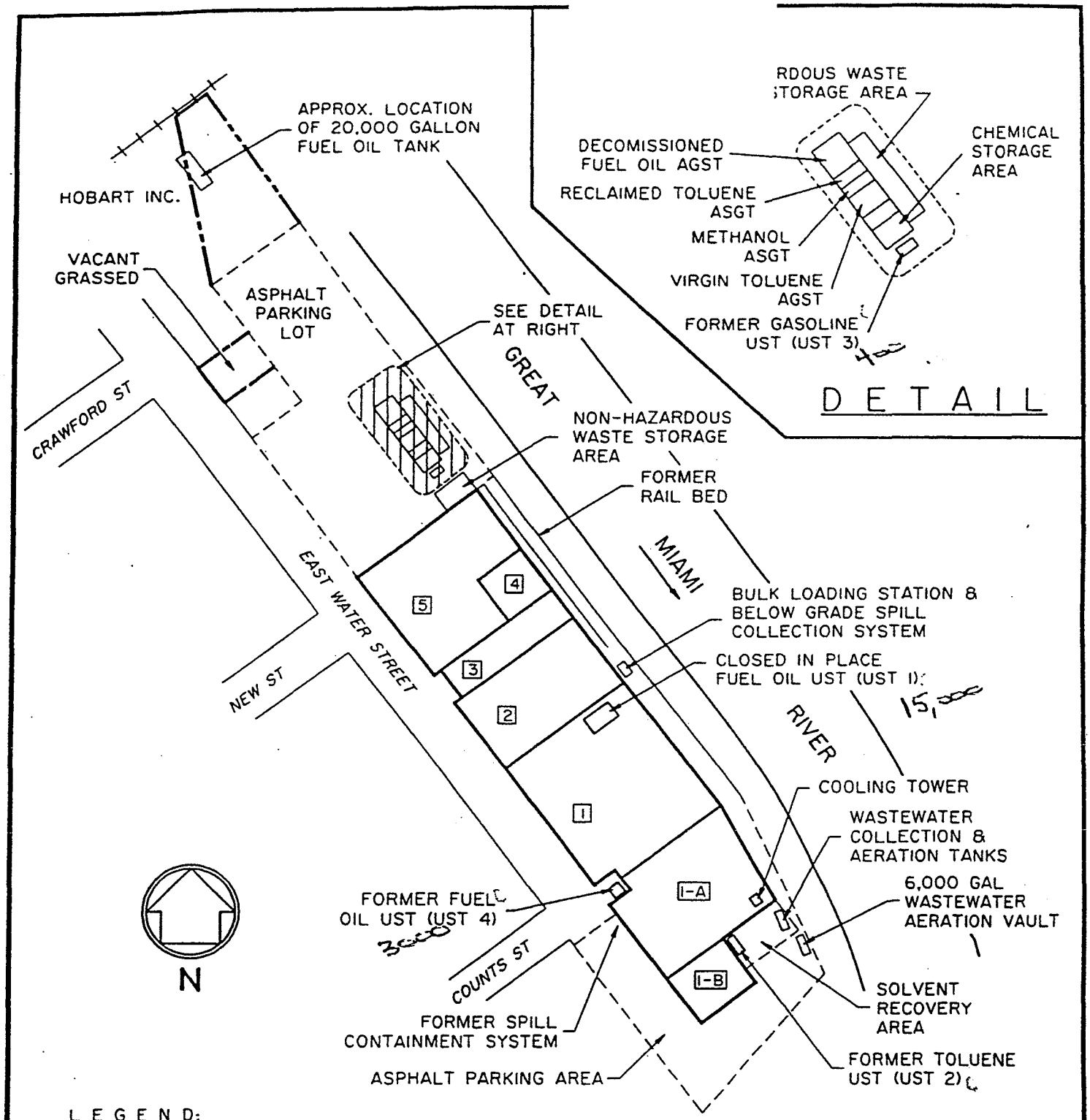


Name: TROY
Date: 2/15/102
Scale: 1 inch equals 2222 feet

Location: 040° 02' 52.2" N 084° 13' 01.2" W
Caption: Site Location Map
Sites located at 518 E. Water St and 30 Mary Bill Dr
Troy, Ohio

Copyright (C) 1997, Maptech, Inc.


NO. 5
1000 GPM/72 LB PEERLESS CENT. PUMP ELEC AUTO
ENUNCIATOR PANEL
PIPING IN NO. 5
NO SCALE
TOTAL FLOODING CO2 DISCHARGE SYSTEMS 30 SEC EVACUATION ALARM
DRUM STOR FLAMMABLE
GLUE MIXING FLAMMABLE
PROPERTY LINE
HAZ WASTE DRUM STOR SPILL PAD
10,000 METHANOL
10,000 FUEL OIL
30,000 FUEL OIL
10,000 TOLUENE
10' DRIVE THRU GATE
FLAMMABLE CHEMICALS
SPILL PAD
SERVICE ENTRANCE
FACTORY OFFICE
PULL ALARM BOX
STACK
STEAM BOILER BASEMENT
BOILER ROOM BASEMENT
MIXING ROOM 2
SOLVENT RECOVERY UNITS
3500 SOLVENT UNDERGROUND
DOUBLE DOOR SERVICE ENTRANCE
SHEETER BLDG.
SHIPPING DOCK
BREAK ROOM
CITY WATER IN
GAS SHUT OFF VALVE
EMPLOYEE GATE
12' DRIVE THRU GATE
FENCE & PROPERTY LINE
PARKING
APPROX 800'
2 O'HEAD DOORS
4' DROP
9 X 8 O'HEAD DOOR GROUND LEVEL
BOILER ROOM CONC BASEMENT
SERVICE ENTRANCE
NO. 5
NO. 4
NO. 3
NO. 2
NO. 1
NO. 1-A
E. WATER ST.
N. COUNTS ST.
NEW ST.
SCHOOL
SCHOOL
FROM GRID
SEE INSET
FIRE EQUIPMENT PLT
WELSH
BROWN-BRIDGE



LEGEND:

FENCE LINE ------

BUILDING NUMBERS [1]

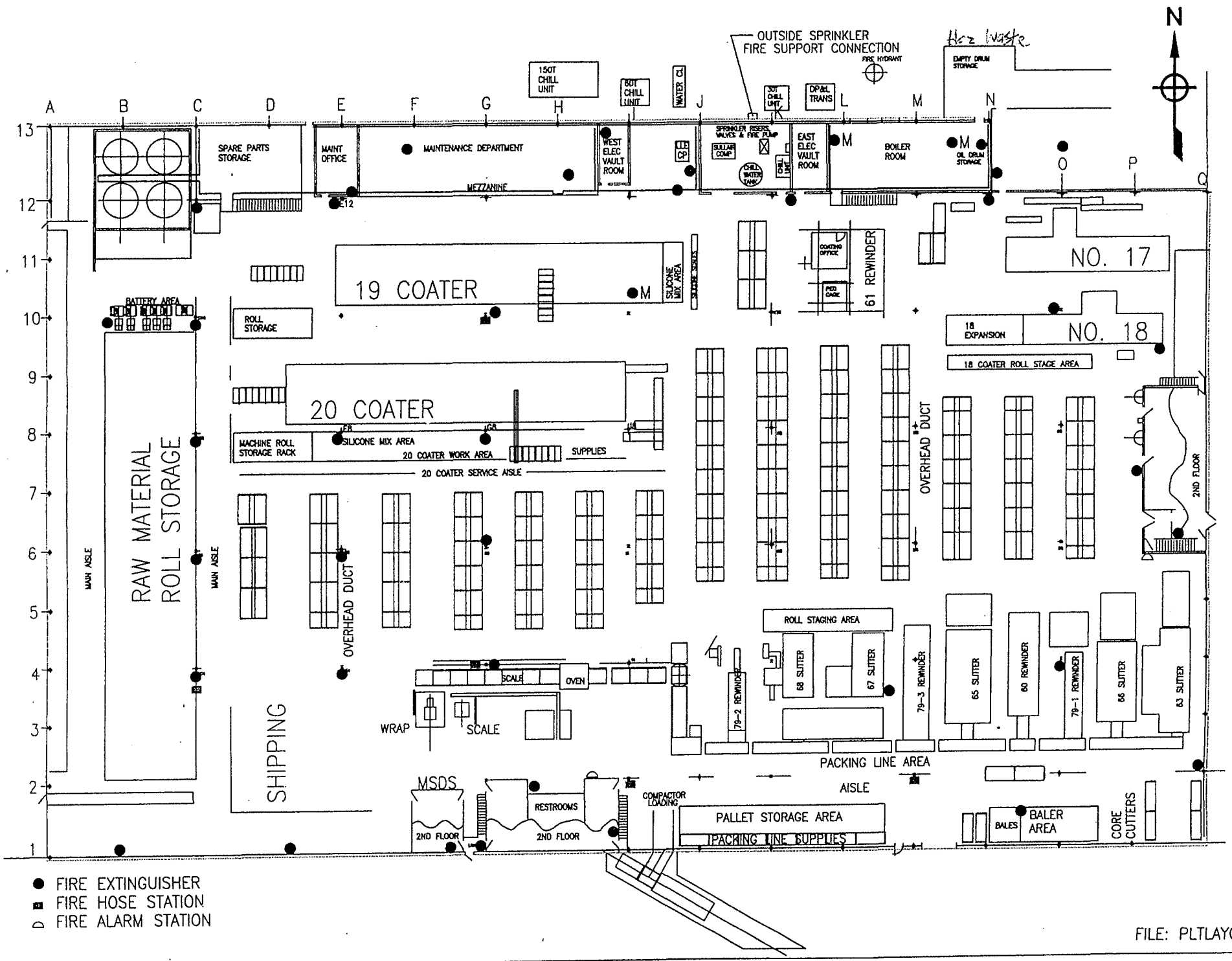
SITE MAP
PLANT 1
BROWN - BRIDGE FACILITY

PREPARED FOR

KIMBERLY - CLARK

ERM-Northeast

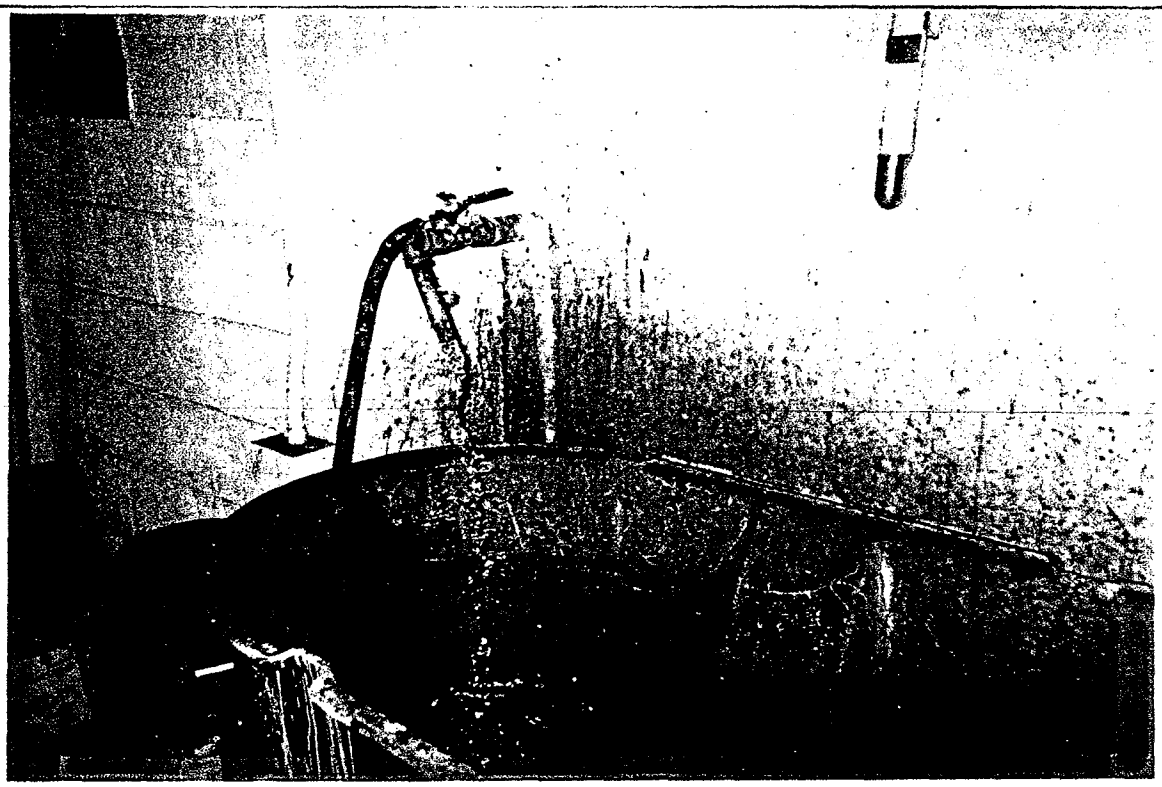
SCALE	FIGURE
1"=140'	2-2
DATE 03/94	



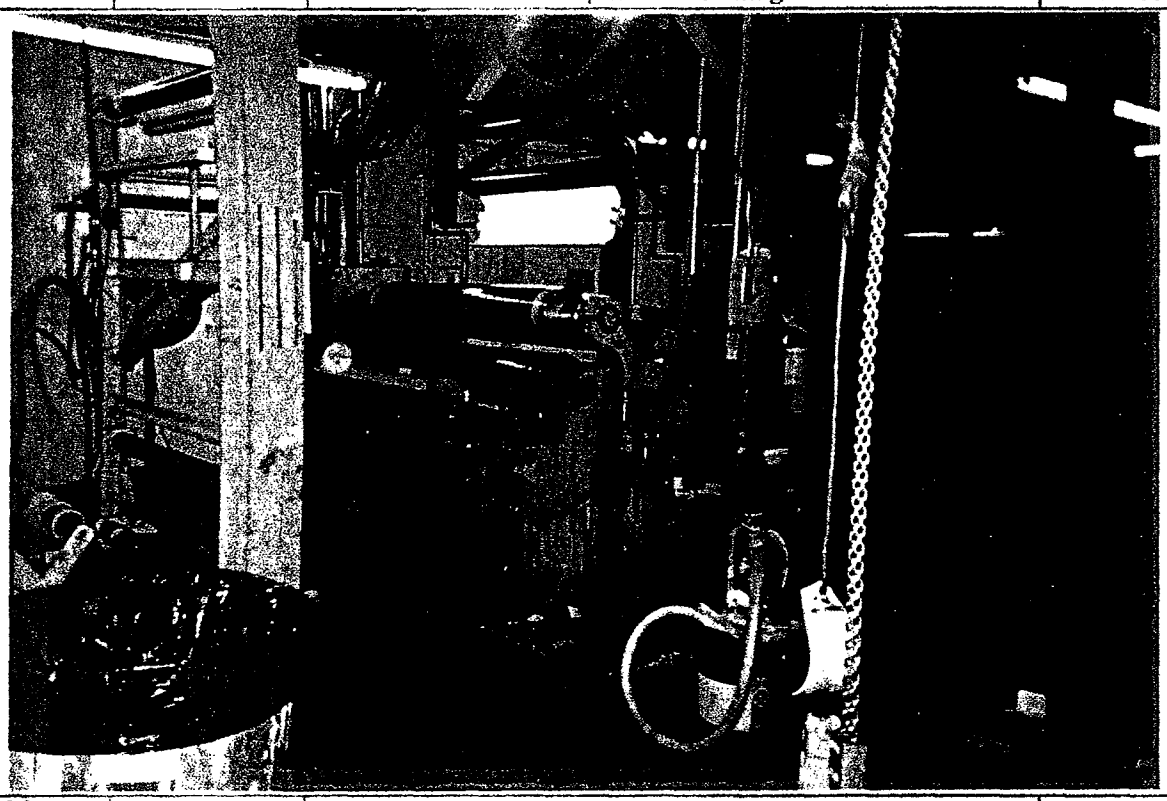
N
OUTSIDE SPRINKLER
FIRE SUPPORT CONNECTION
FIRE HYDRANT
Haz Waste
EMPTY DRUM STORAGE
150T CHILL UNIT
60T CHILL UNIT
WATER CL
30T CHILL UNIT
DP&L TRANS
SPARE PARTS STORAGE
MAINT OFFICE
MAINTENANCE DEPARTMENT
MEZZANINE
WEST ELEC VAULT ROOM
LLE CP
SPRINKLER RISERS, VALVES & FIRE PUMP
SULLAIR COMP
CHILL WATER TANK
CHILL UNIT
EAST ELEC VAULT ROOM
BOILER ROOM
OIL DRUM STORAGE
19 COATER
SILICONE MIX AREA
SILICONE SCALES
COATING OFFICE
PED CAGE
61 REWINDER
NO. 17
NO. 18
18 EXPANSION
18 COATER ROLL STAGE AREA
BATTERY AREA
ROLL STORAGE
20 COATER
MACHINE ROLL STORAGE RACK
SILICONE MIX AREA
20 COATER WORK AREA
SUPPLIES
20 COATER SERVICE AISLE
OVERHEAD DUCT
2ND FLOOR
RAW MATERIAL ROLL STORAGE
MAIN AISLE
MAIN AISLE
OVERHEAD DUCT
ROLL STAGING AREA
SCALE
OVEN
WRAP
SCALE
SHIPPING
79-2 REWINDER
68 SLITTER
67 SLITTER
79-3 REWINDER
65 SLITTER
60 REWINDER
79-1 REWINDER
66 SLITTER
63 SLITTER
PACKING LINE AREA
AISLE
MSDS
2ND FLOOR
RESTROOMS
2ND FLOOR
COMPACTOR LOADING
PALLET STORAGE AREA
PACKING LINE SUPPLIES
BALES
BALER AREA
CORE CUTTERS
FIRE EXTINGUISHER
FIRE HOSE STATION
FIRE ALARM STATION
FILE: PLTLAYOT

Appendices

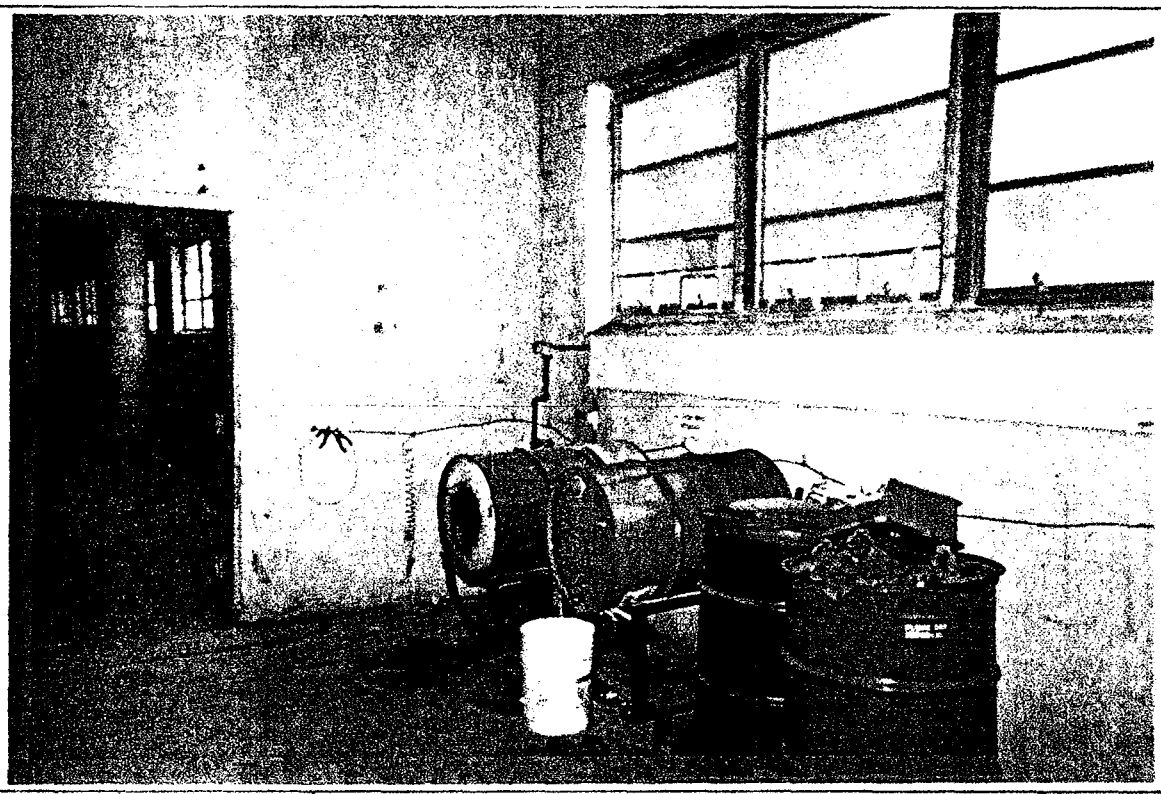
Appendix A
Site Photographs



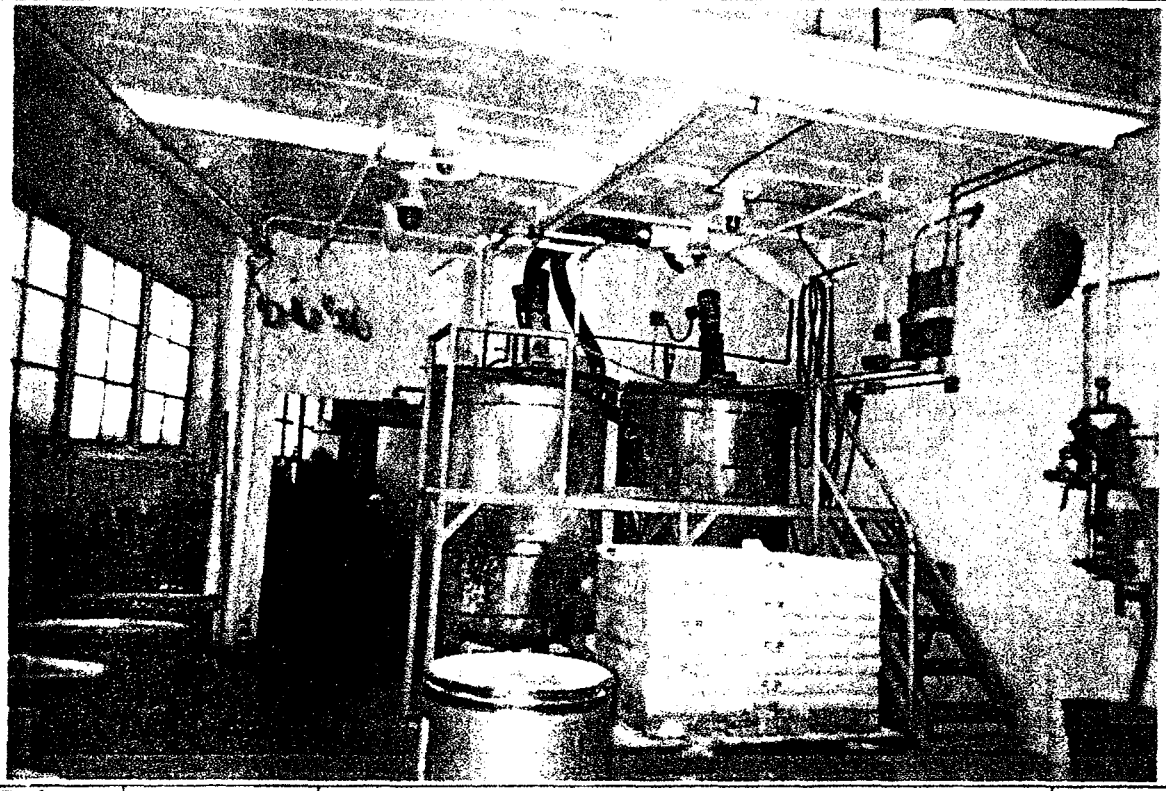
ERM Project No.	Description	Sink, wash water from flexographic printing discharged to POTW	Photo 1
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02



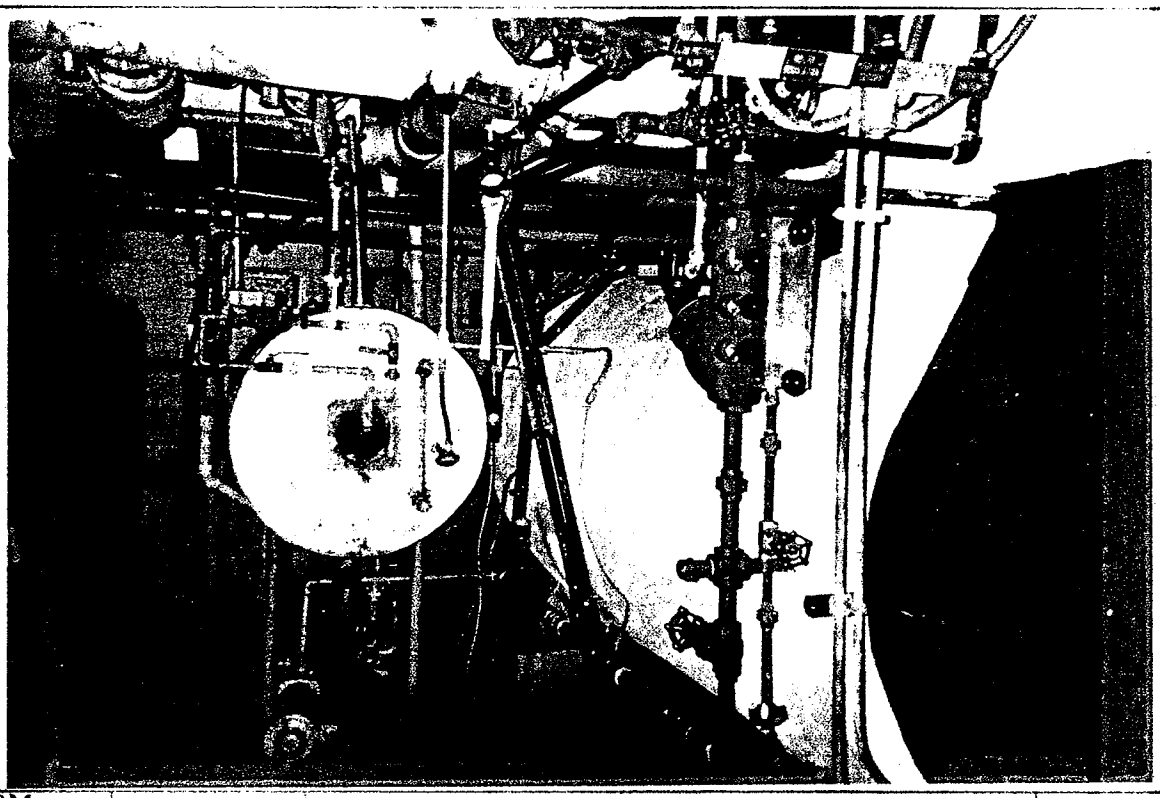
ERM Project No.	Description	Flexographic Printer #61	Photo 2
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02



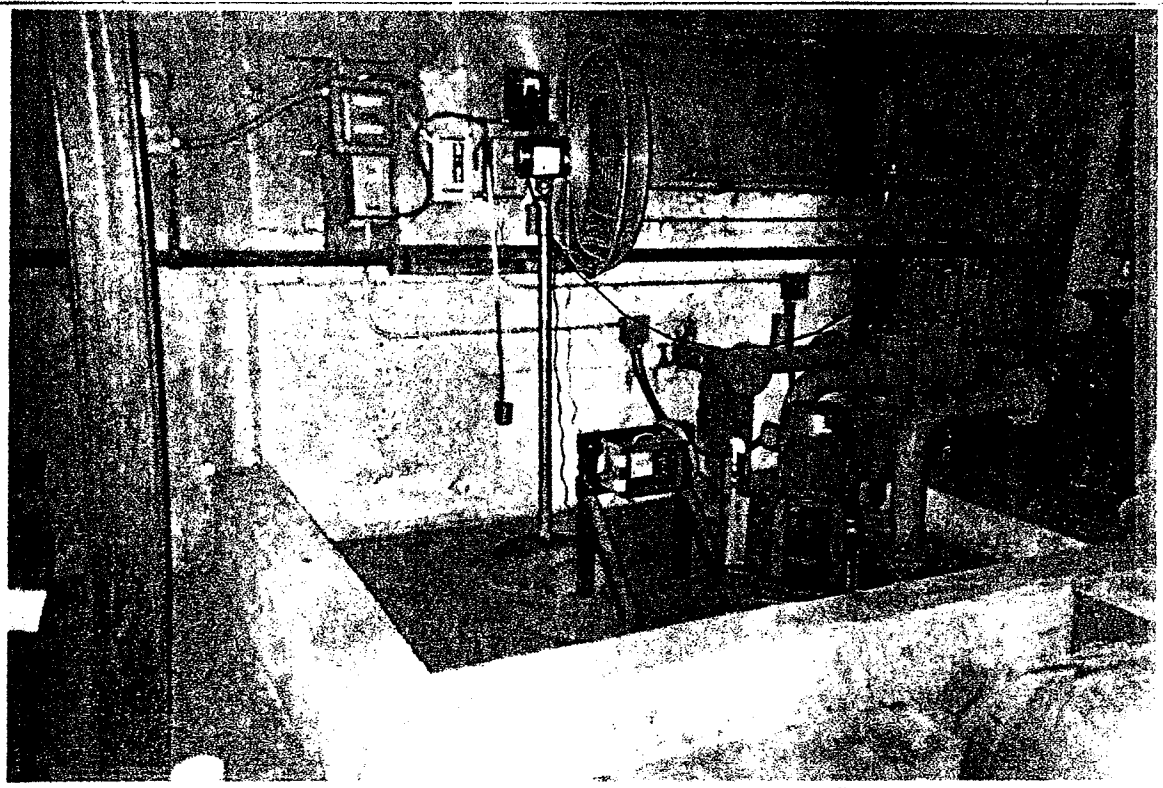
ERM Project No. HR501.00.01	Description	Former Solvent Storage Area	Photo 3
	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date 1-Feb-02
	Client	Spinnaker Coating	



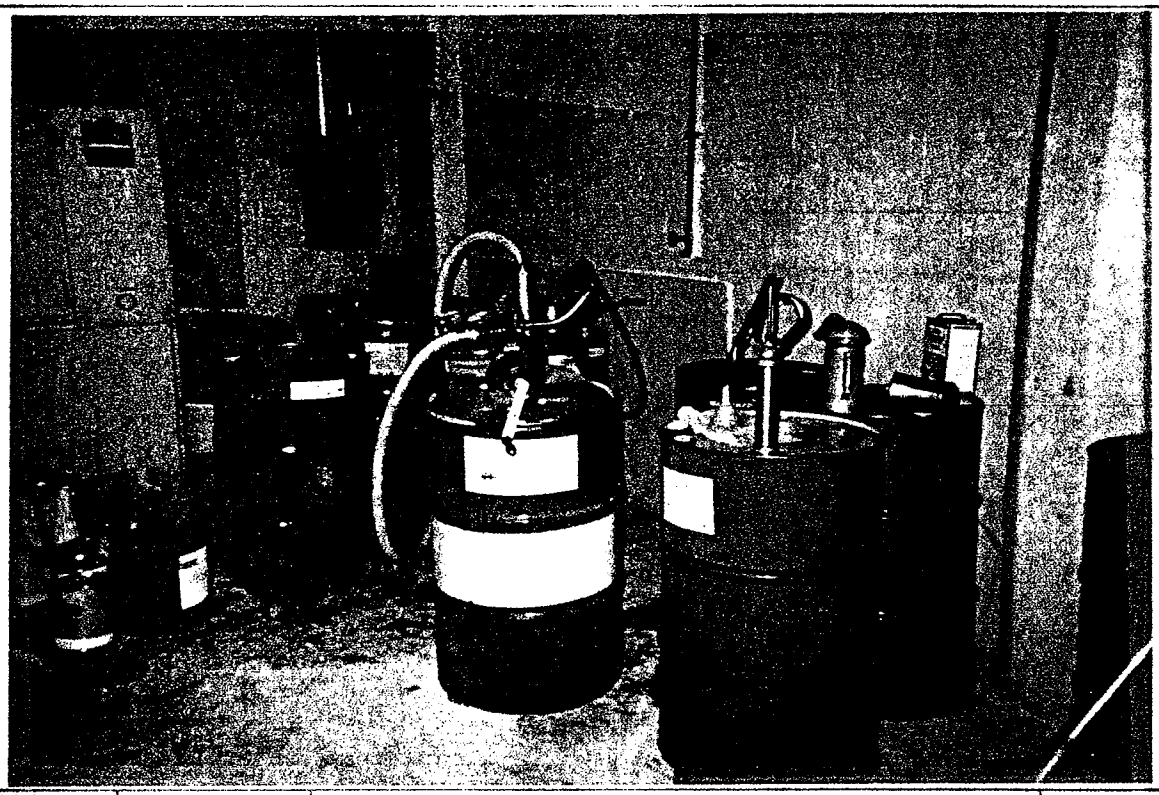
ERM Project No. HR501.00.01	Description	Holding Tanks 6A and 6B, mixes barrier coat	Photo 4
	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date 1-Feb-02
	Client	Spinnaker Coating	



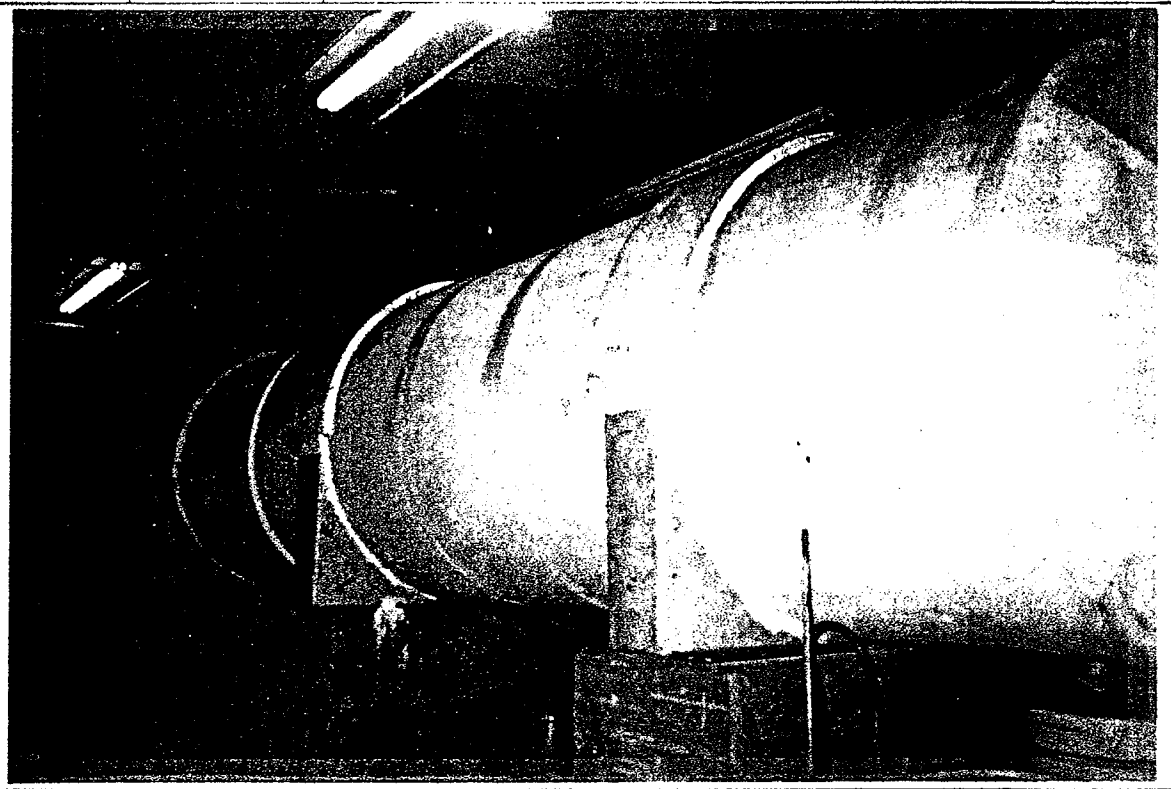
ERM Project No.	Description	Basement Boiler Room, asbestos removed	Photo 5
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02



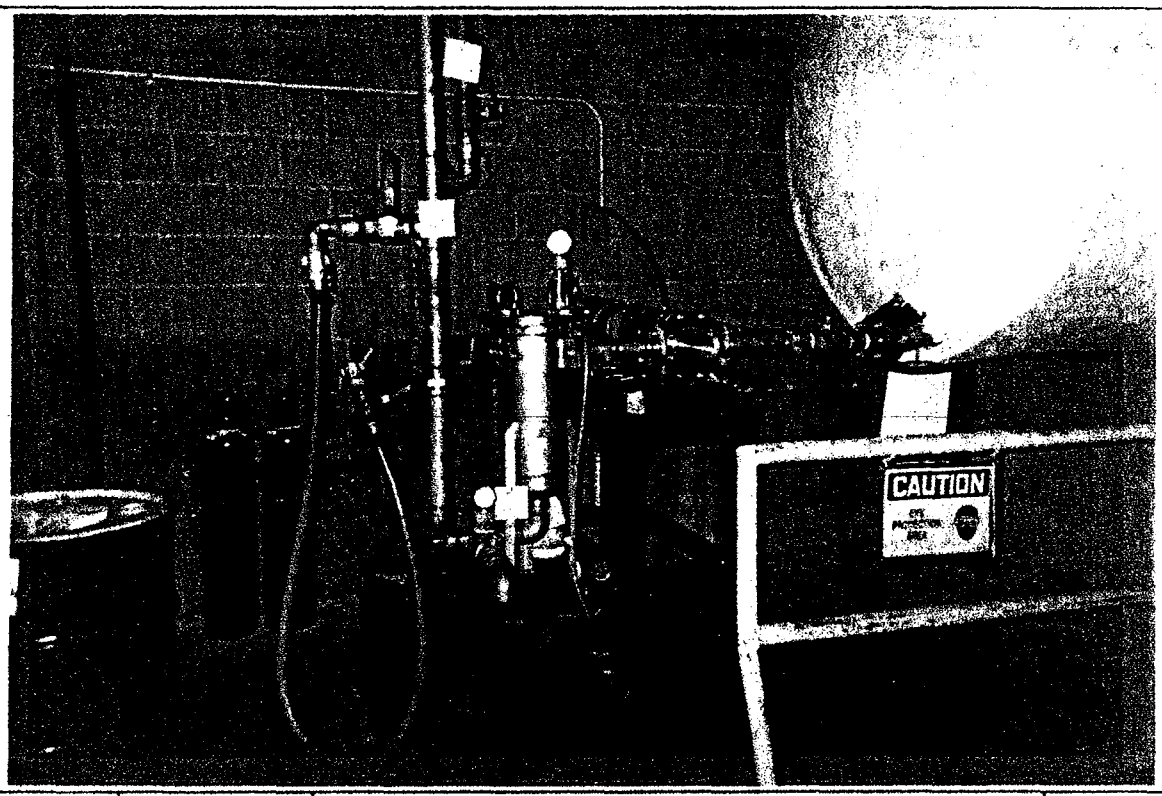
ERM Project No.	Description	Building 2 Basement NPDES Outfall	Photo 6
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02



ERM Project No.	Description	Building 2 Second Floor Mezzanine Oil Storage Area	Photo 7
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02

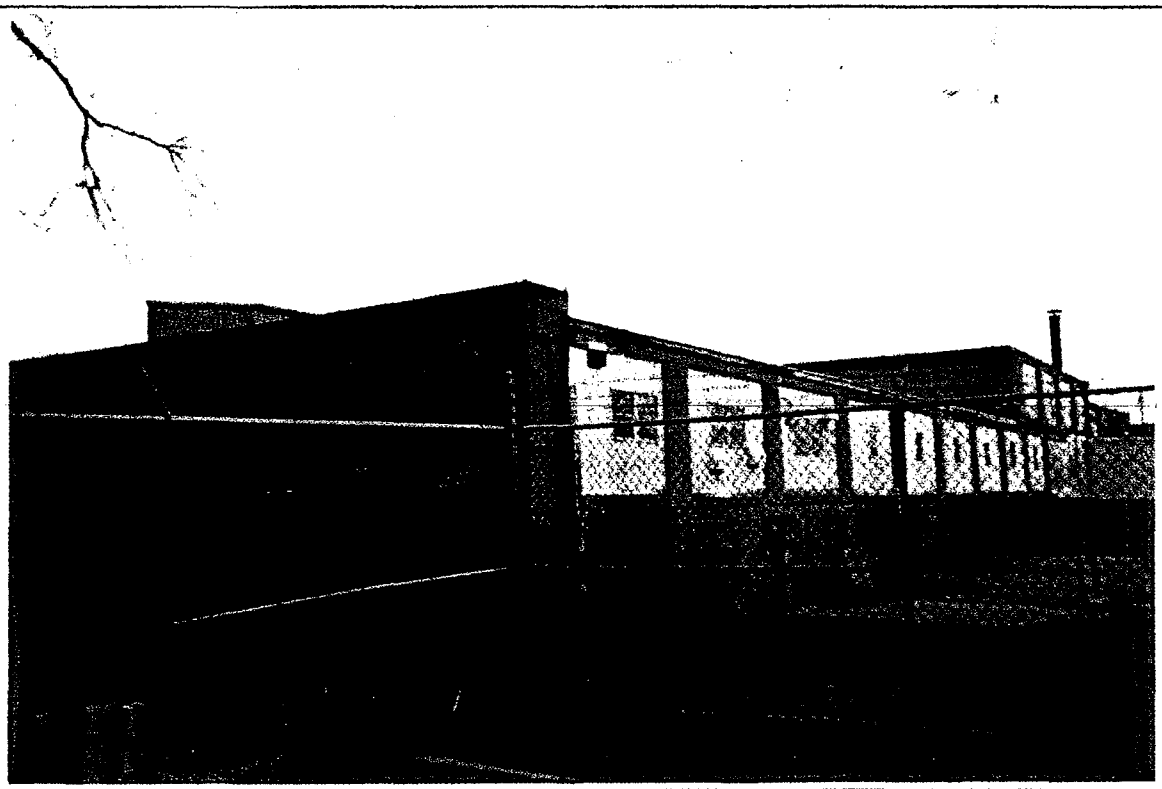


ERM Project No.	Description	Building 5 First Floor 6,000-gallon Water-based Adhesive Tank	Photo 8
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02

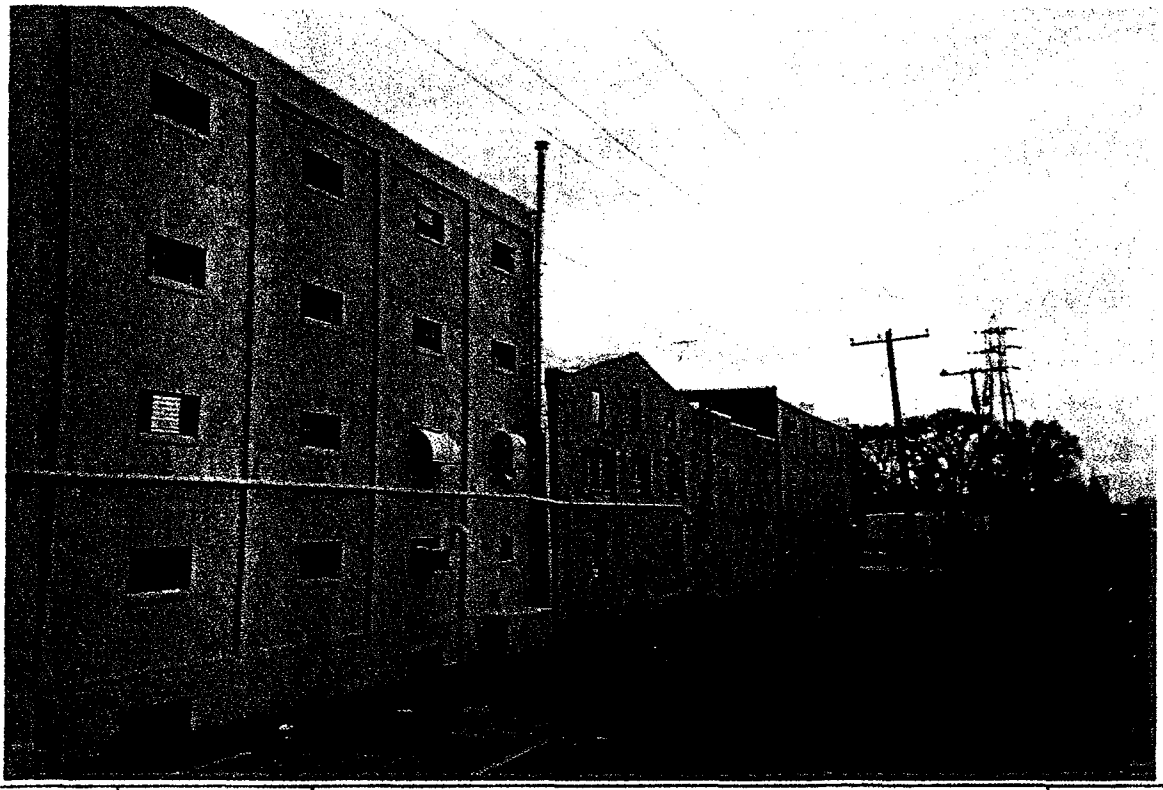


ERM Project No.	Description	Building 5 First Floor 6,000-gallon Water-based Adhesive Tank	Photo 9
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02

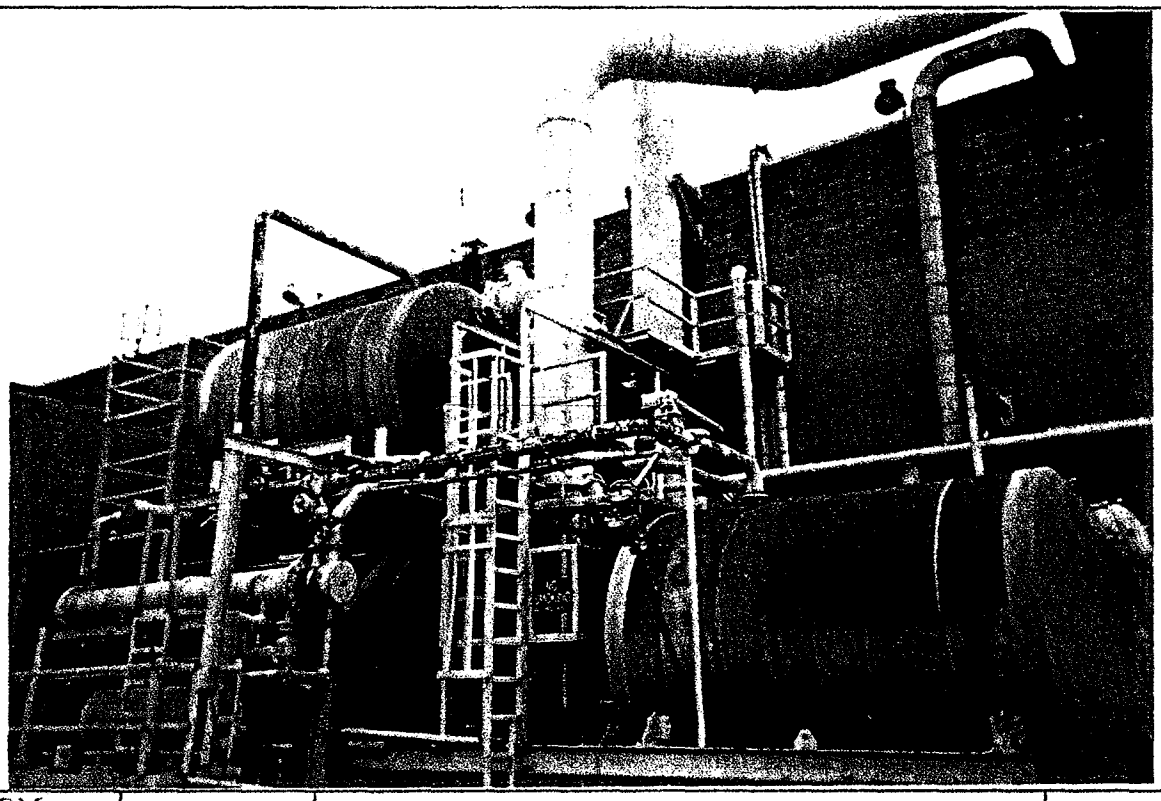
ERM Project No.	Description	West Side of Plant #1	Photo 10
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02



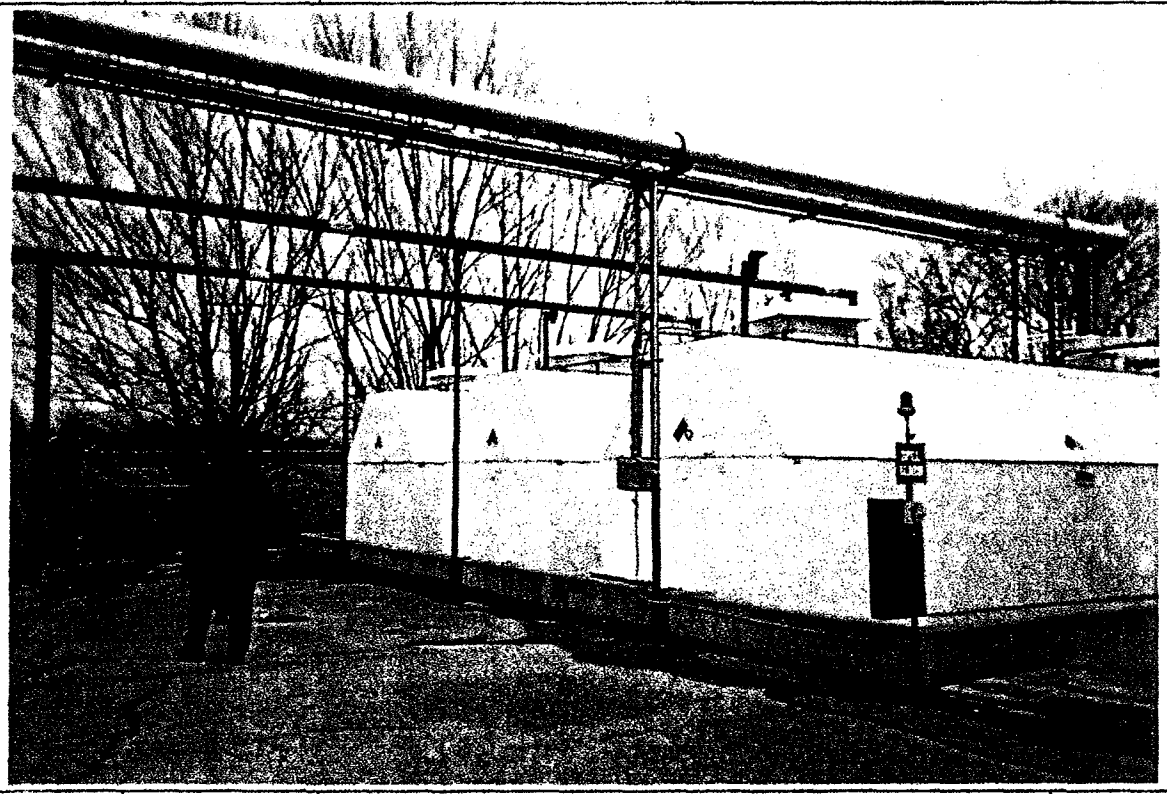
ERM Project No.	Description	Hobart Cabinet Company located west of Plant#1	Photo 11
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02



ERM Project No.	Description	North Side of Plant #1	Photo 12
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02

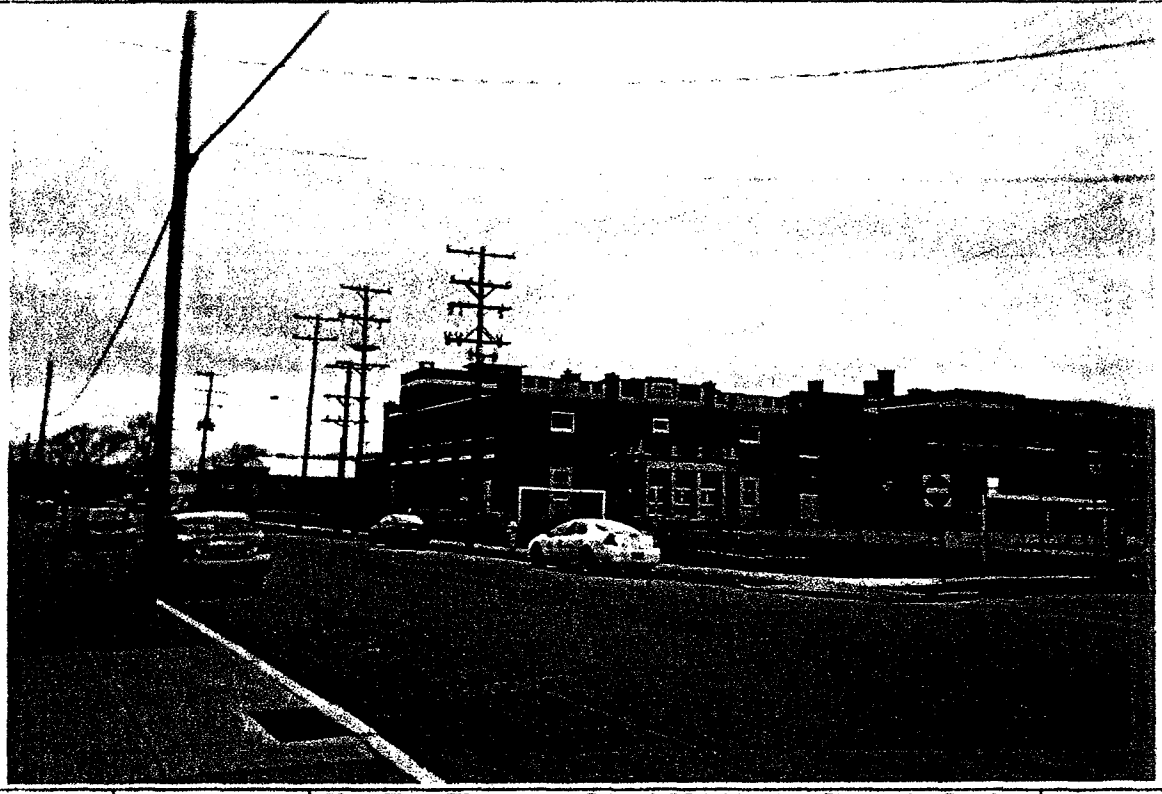


ERM Project No.	Description	Former Solvent Recovery System	Photo 13
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02



ERM Project No.	Description	Solvent AST Tank Farm - no longer in service	Photo 14
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02

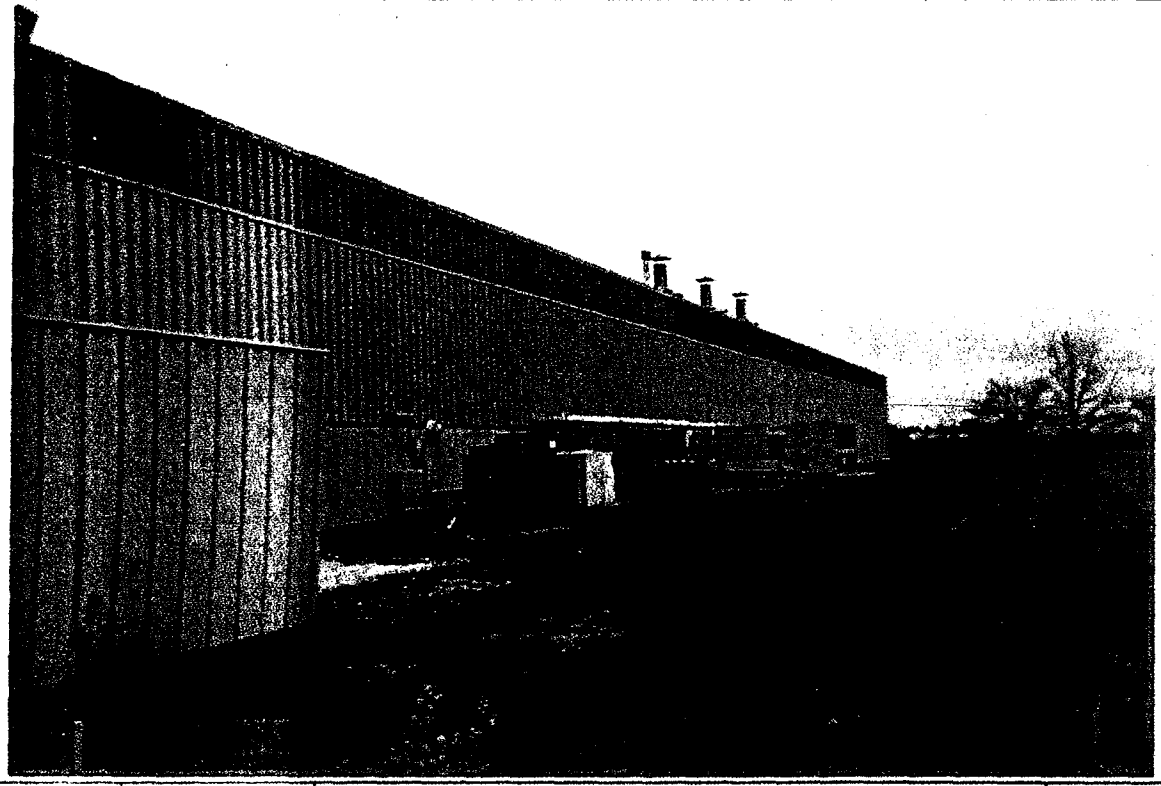
ERM Project No.	Description	South Side of Plant #1	Photo 15
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02



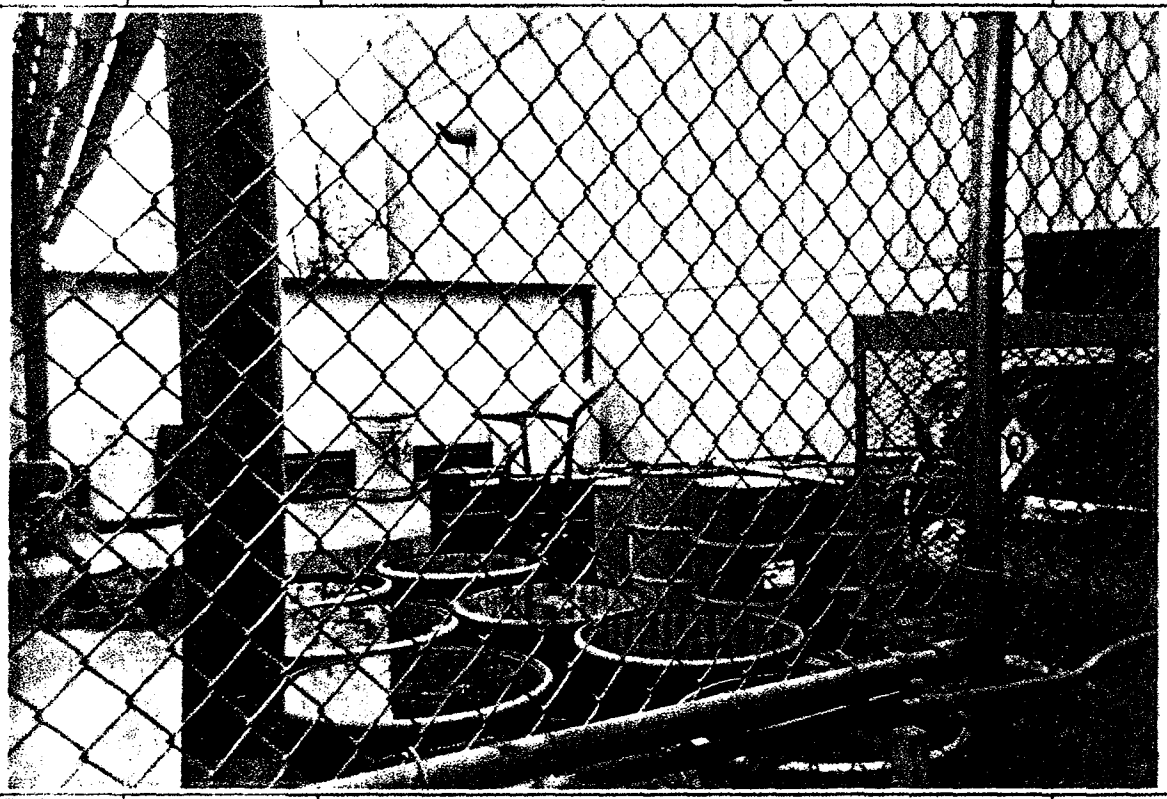
ERM Project No.	Description	Van Cleve Elementary School (Neighboring Site to the South of Plant #1)	Photo 16
HR501.00.01	Site Name	Plant #1 - 518 E. Water Street, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02

ERM Project No.	Description	East Property Line	Photo 17
HR501.00.01	Site Name	Plant #2 - 30 Mary Bill Drive, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02

ERM Project No.	Description	South Side of Plant #2	Photo 18
HR501.00.01	Site Name	Plant #2 - 30 Mary Bill Drive, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02

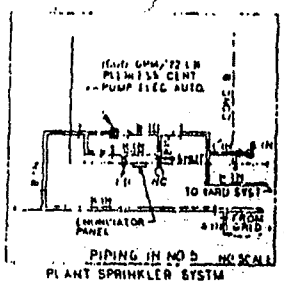


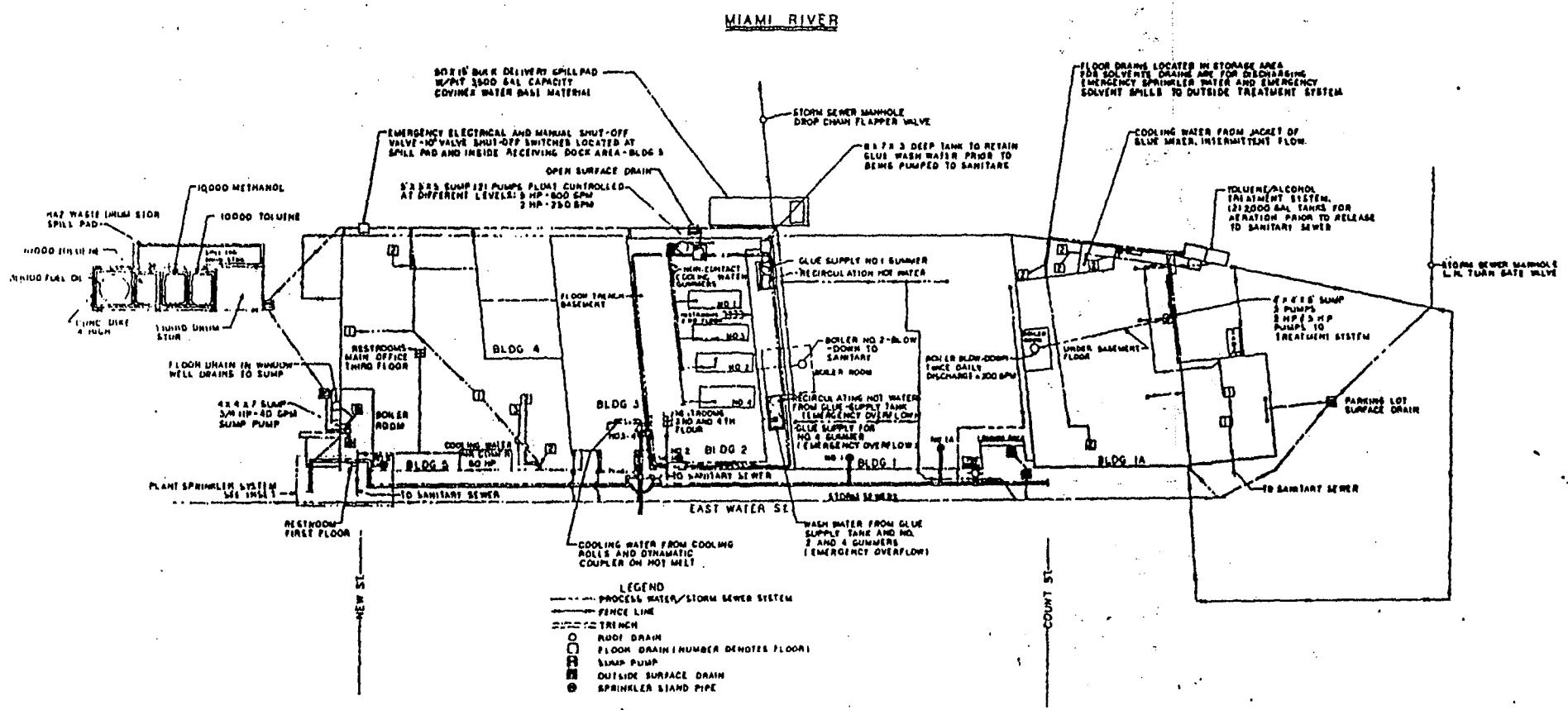
ERM Project No.	Description	North Side of Plant #2	Photo 19
HR501.00.01	Site Name	Plant #2 - 30 Mary Bill Drive, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02



ERM Project No.	Description	Hazardous Waste Storage Pad	Photo 20
HR501.00.01	Site Name	Plant #2 - 30 Mary Bill Drive, Troy OH	Date
	Client	Spinnaker Coating	1-Feb-02

Appendix B
Facility Layout Drawings for Plant No. 1

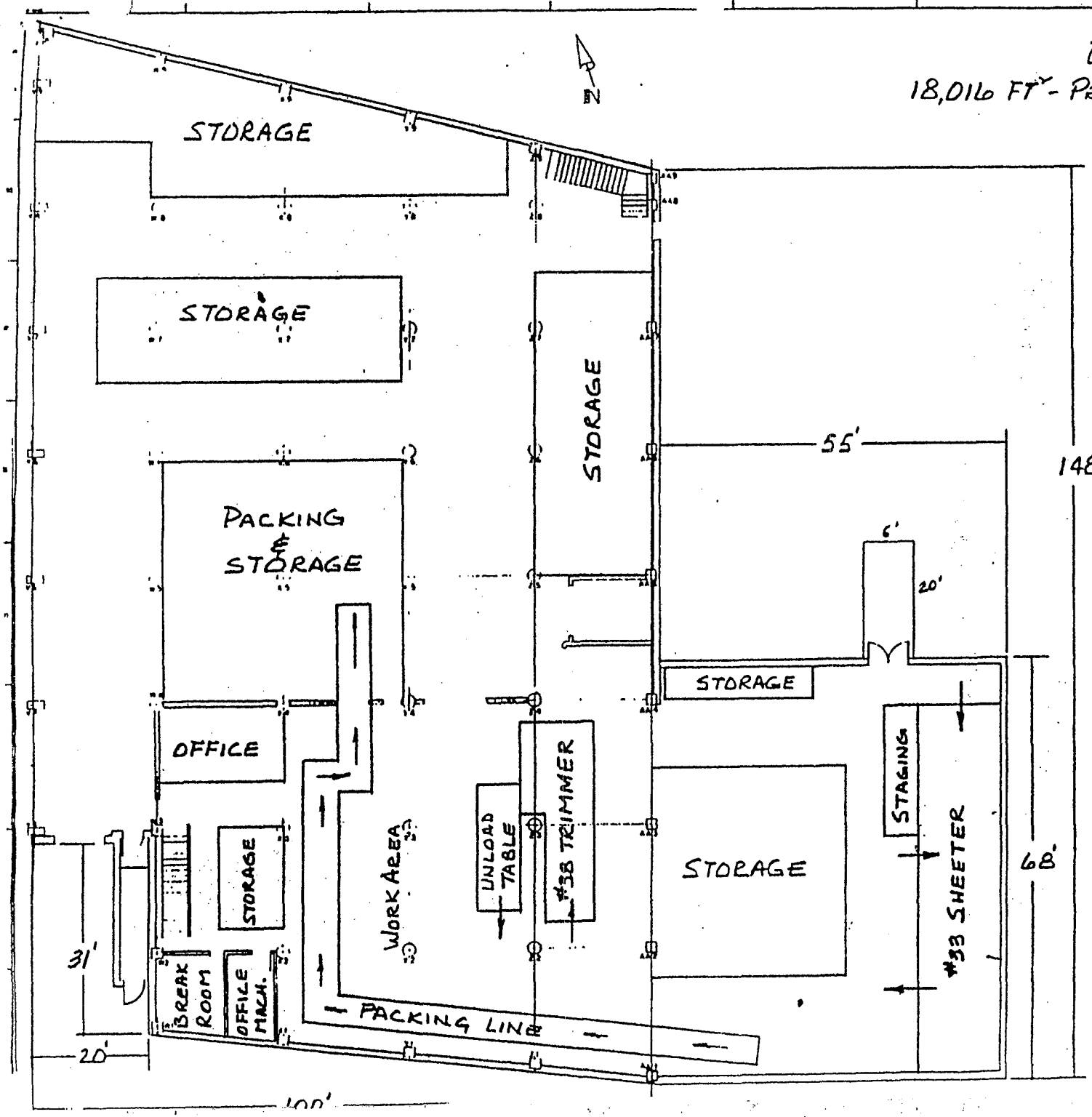




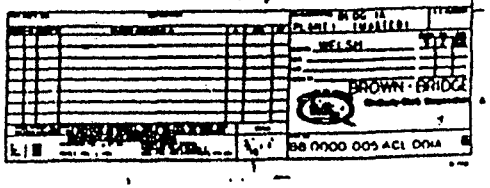
BROWN-BRIDGE

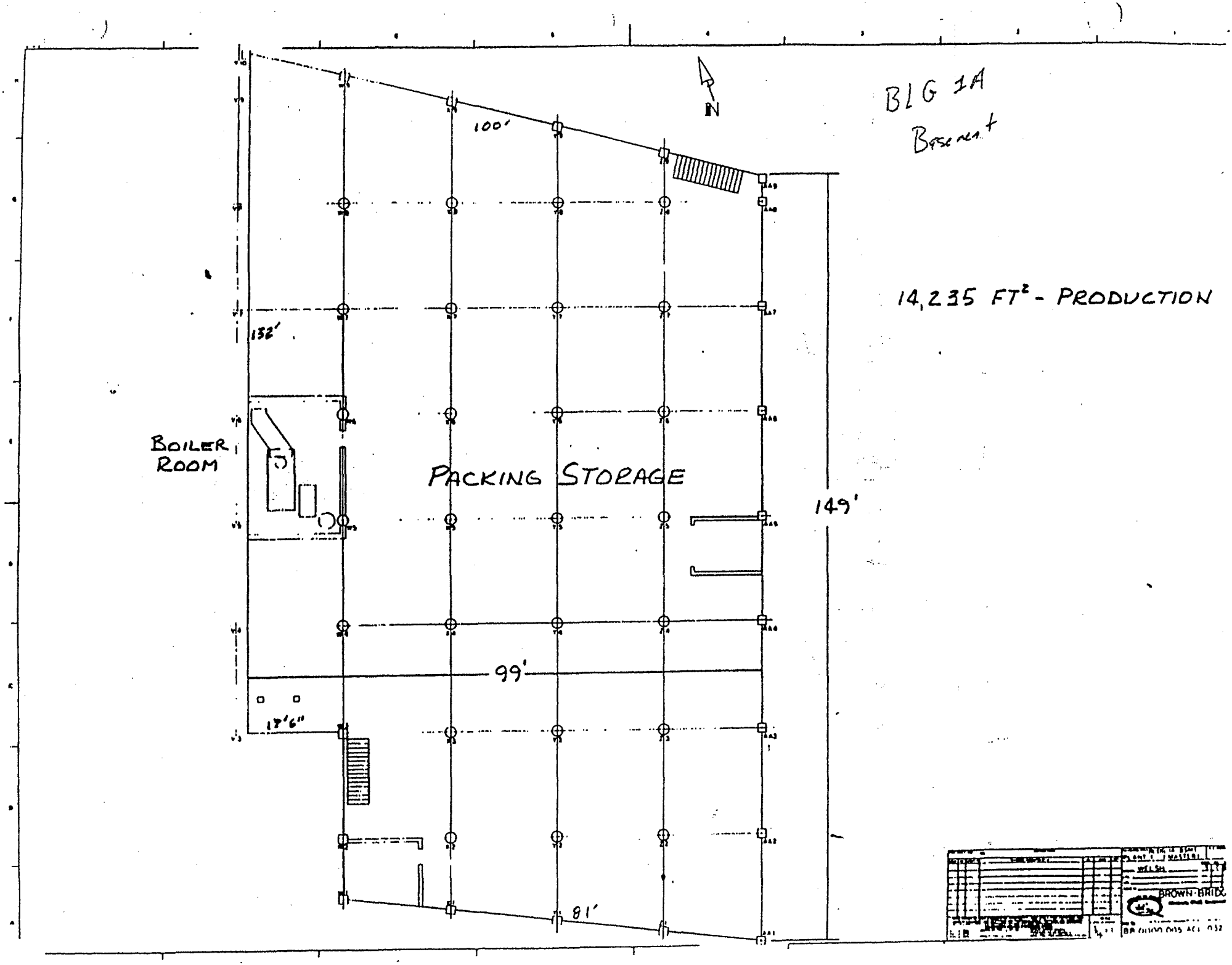
E-1056-1

Bldg 1A - Ground
18,016 FT² - PRODUCTION

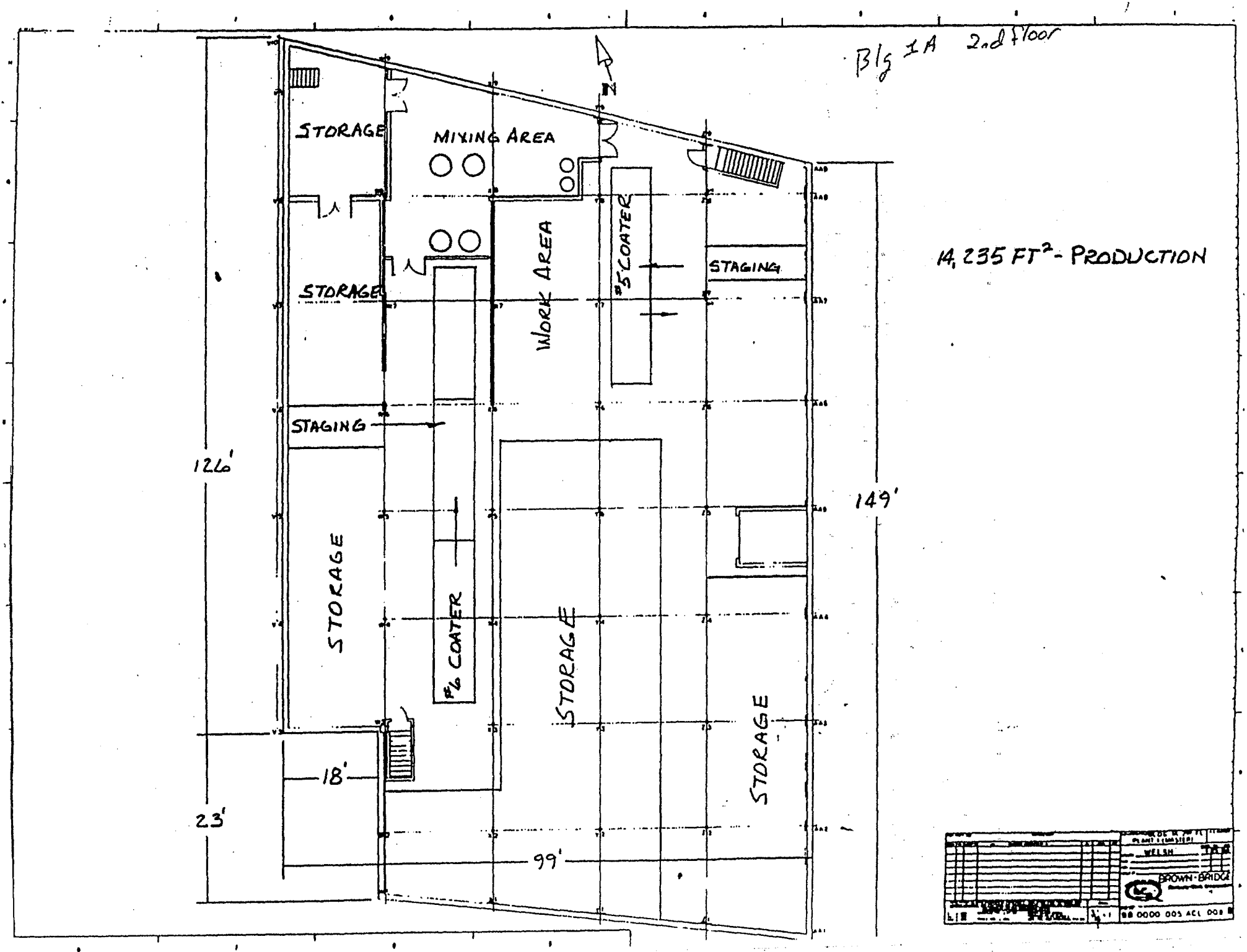


East Parking Lot
23,736 FT²

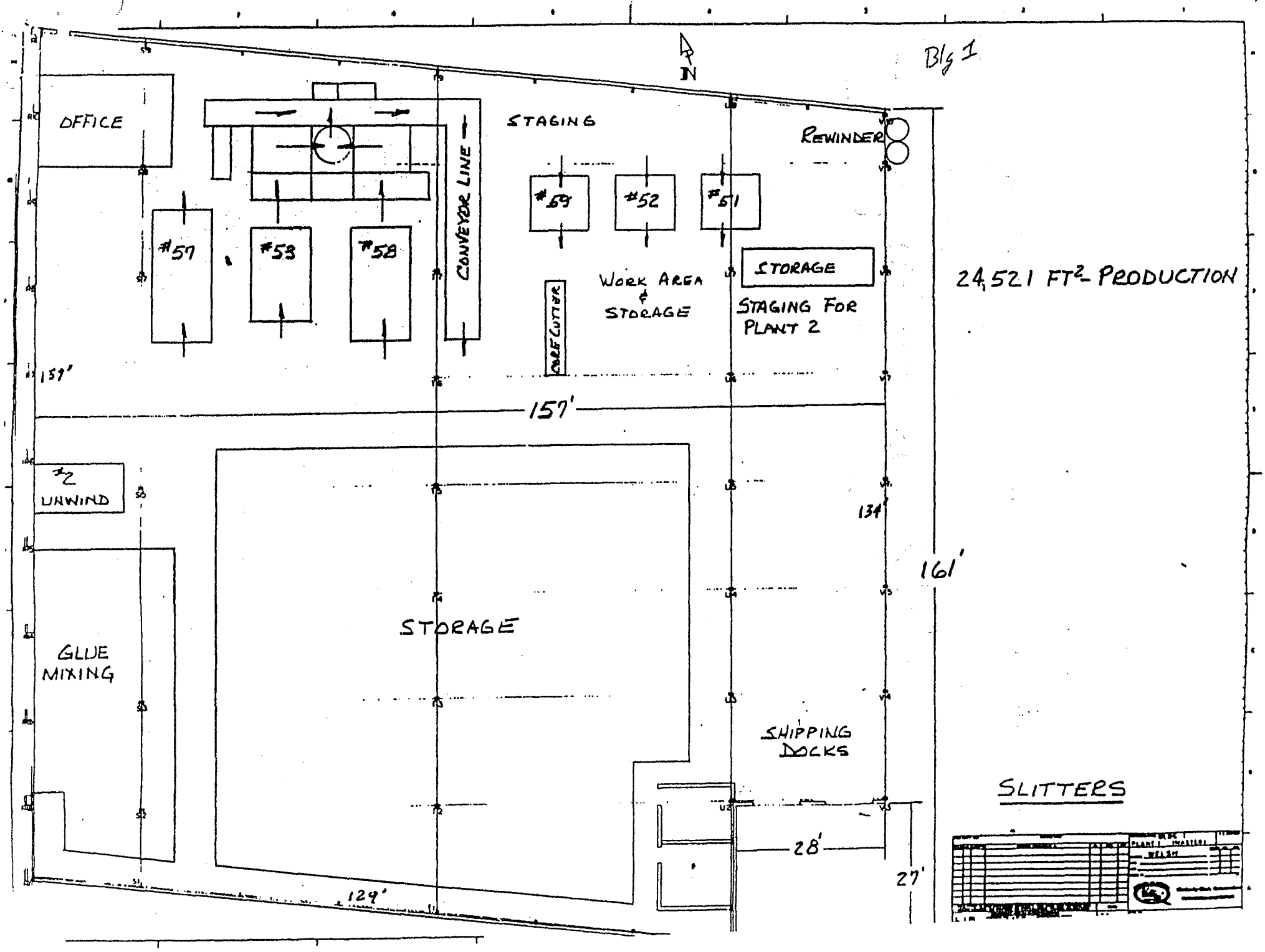


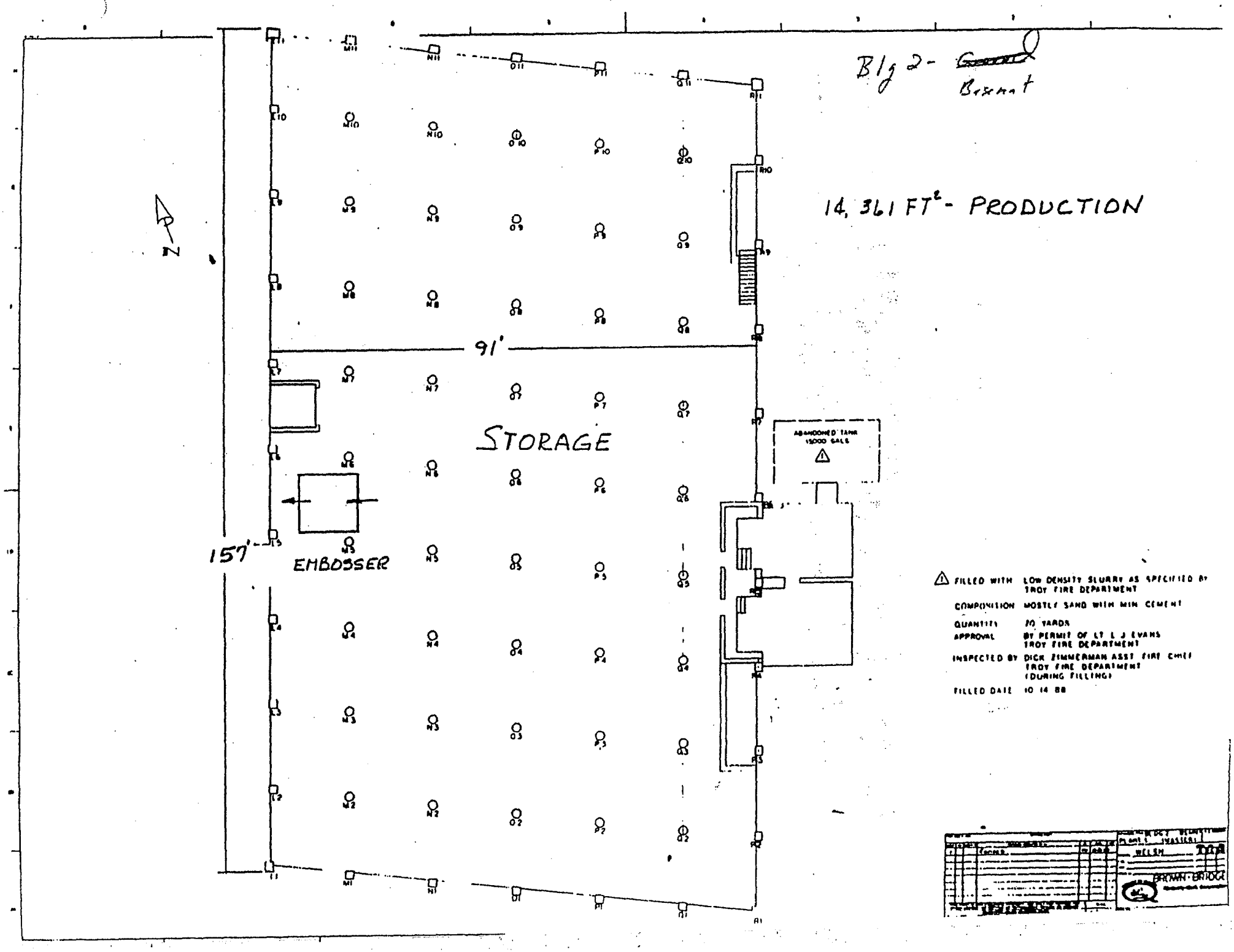

BLG 1A
Basement
N
100'
132'
BOILER ROOM
PACKING STORAGE
149'
99'
17'6"
81'
14,235 FT² - PRODUCTION
BROWN-BRIDGE

Blg 1A 2nd floor

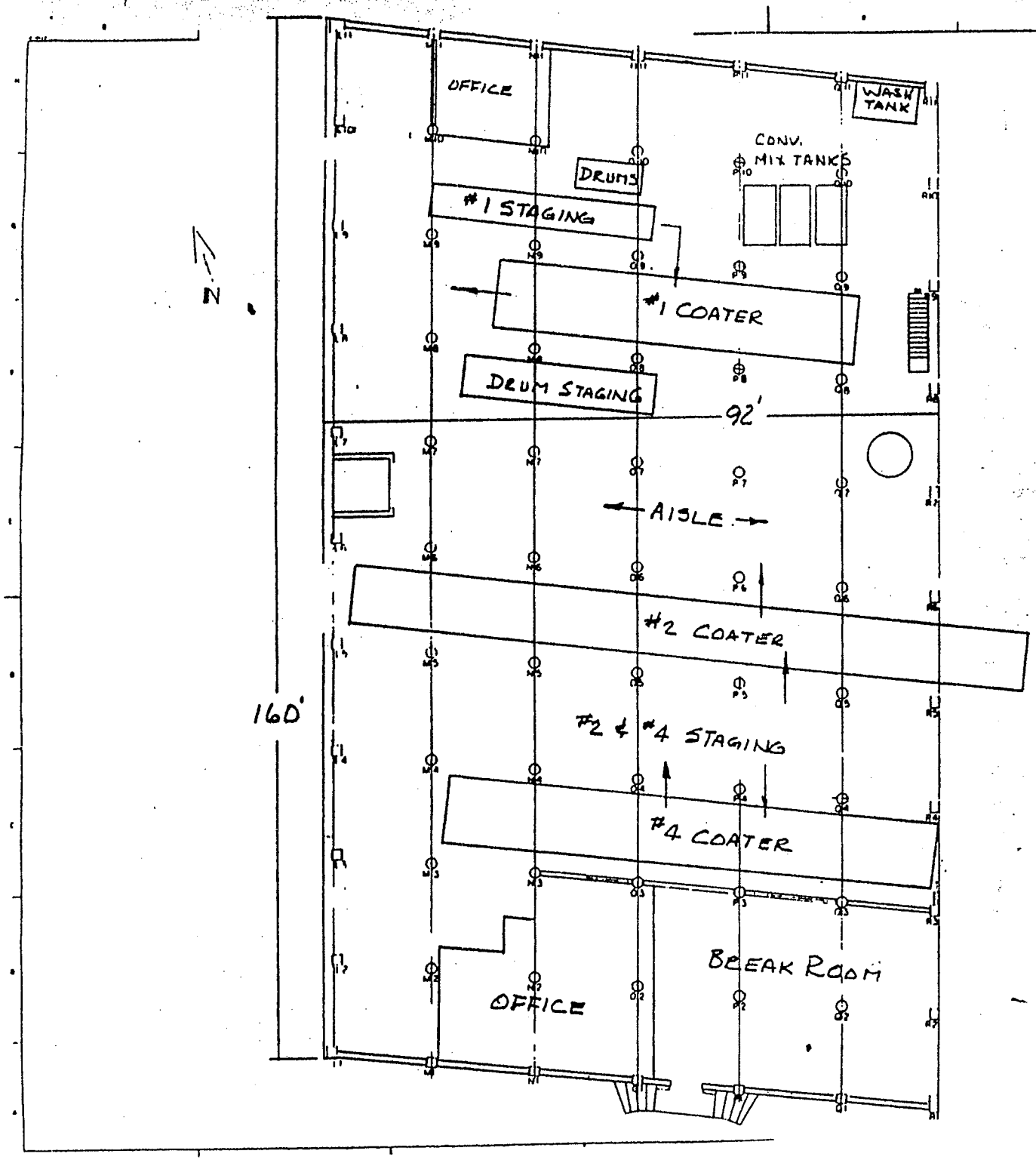


14,235 FT² - PRODUCTION


Blg 1
N
OFFICE
STAGING
REWINDER
CONVEYOR LINE
#57
#53
#58
#59
#52
#51
WORK AREA & STORAGE
CORE CUTTER
STORAGE
STAGING FOR PLANT 2
24,521 FT² - PRODUCTION
157'
157'
#2 UNWIND
134'
161'
GLUE MIXING
STORAGE
SHIPPING DOCKS
SLITTERS
28'
27'
124'

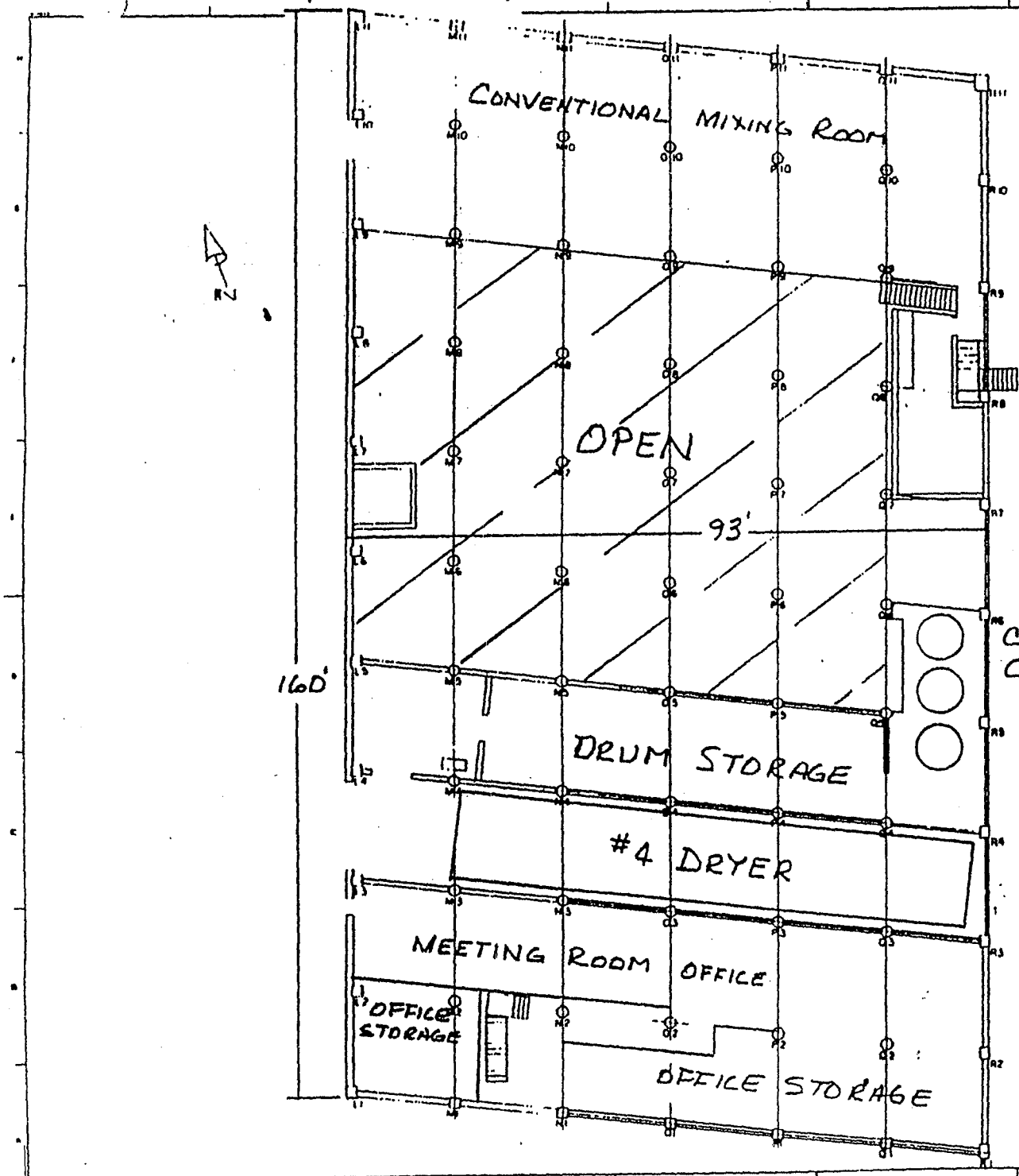

Blg 2- Basement
14,361 FT² - PRODUCTION
N
91'
157'
STORAGE
EMBOSSER
ABANDONED TANK 15000 GALS
FILLED WITH LOW DENSITY SLURRY AS SPECIFIED BY TROY FIRE DEPARTMENT
COMPOSITION MOSTLY SAND WITH MIN CEMENT
QUANTITY 70 YARDS
APPROVAL BY PERMIT OF LT L J EVANS TROY FIRE DEPARTMENT
INSPECTED BY DICK ZIMMERMAN ASST FIRE CHIEF TROY FIRE DEPARTMENT (DURING FILLING)
FILLED DATE 10 14 88
WELSH
BROWN-BRIDGE

Bldg 2 - ground



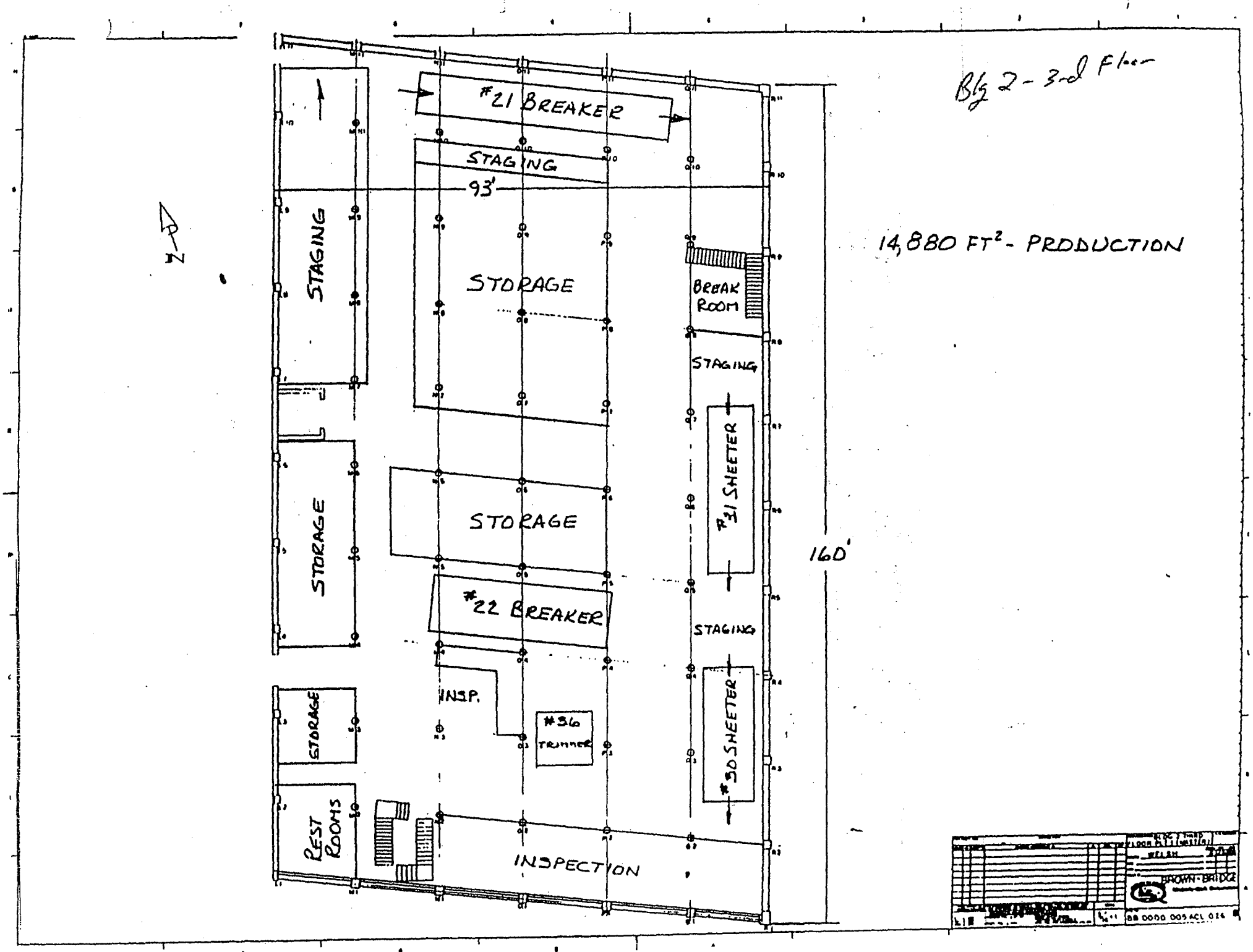
15,012 FT² - PRODUCTION

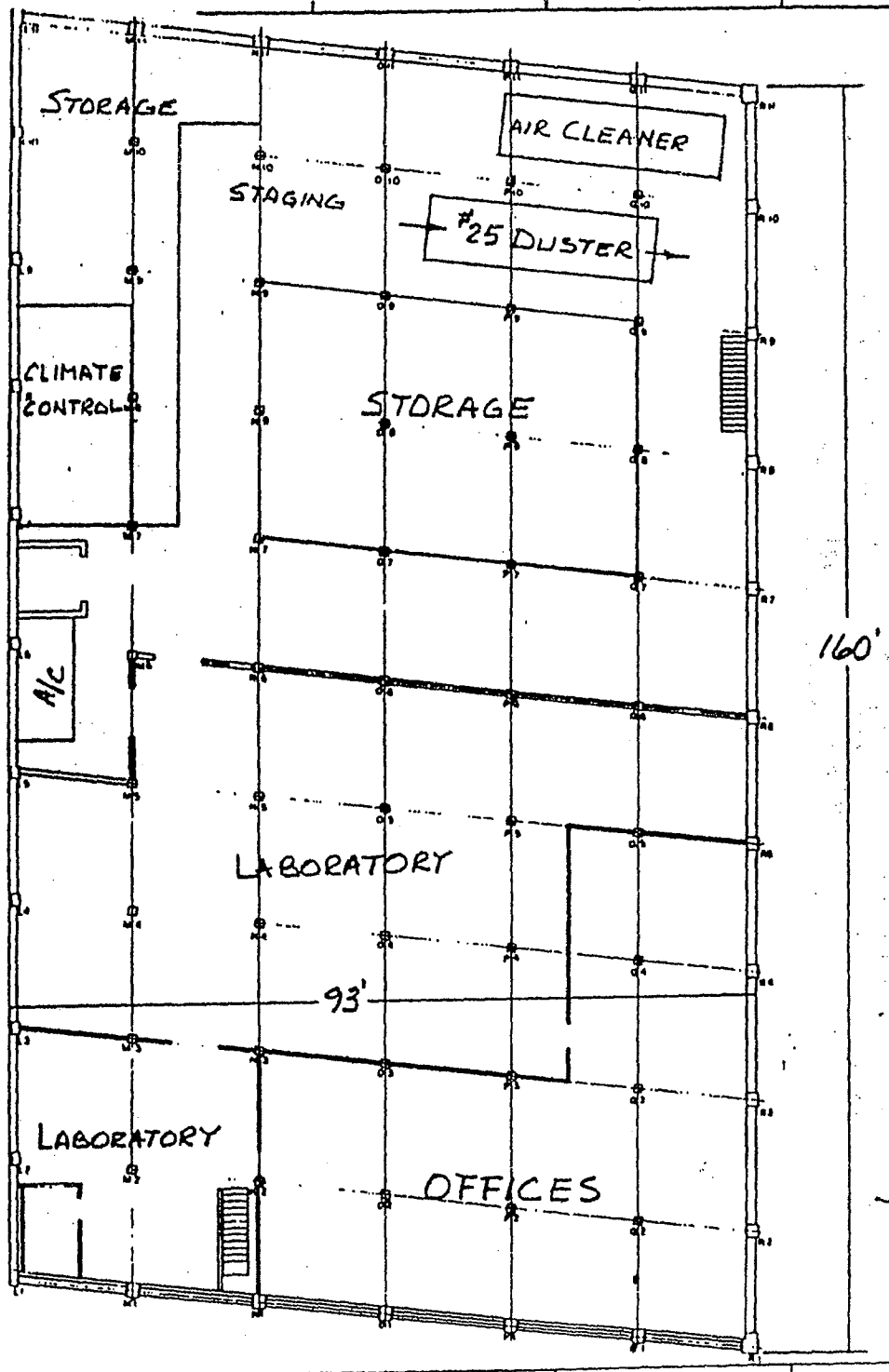
Bldg 2 - 2nd floor



6806 FT² - PRODUCTION
2970 FT² - OFFICE
5104 FT² - OPEN
14,880 FT² - TOTAL

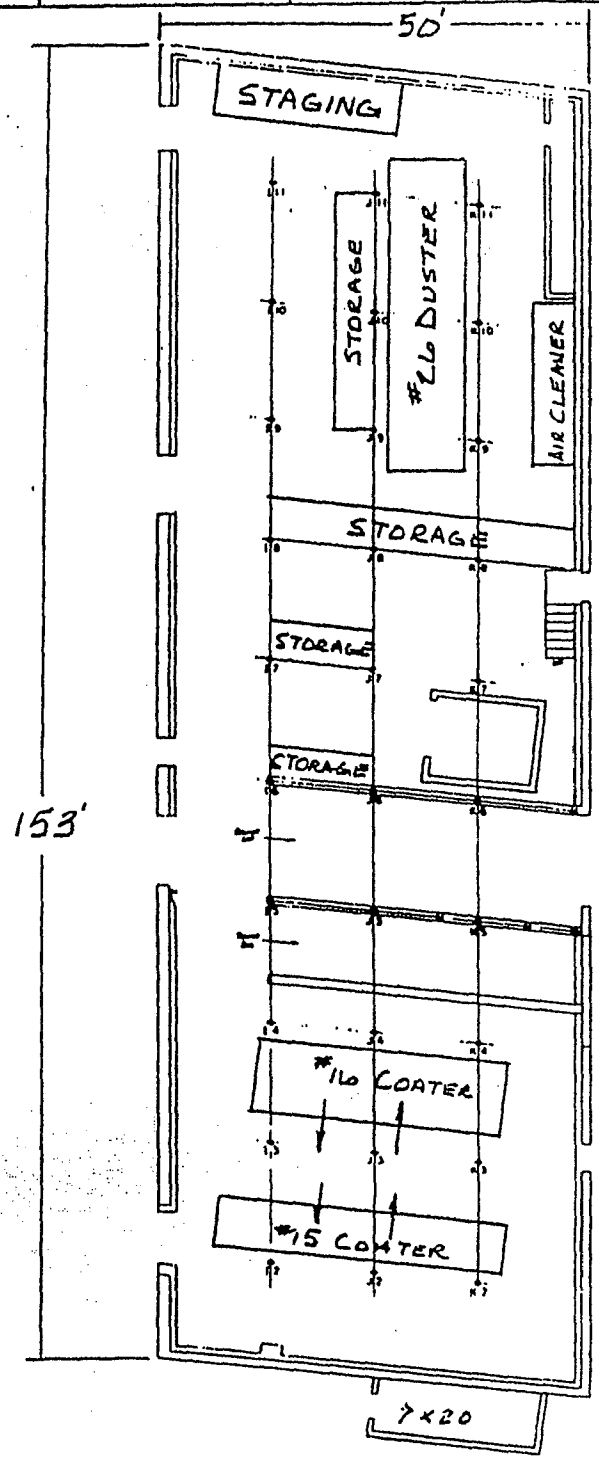
BROWN-BRIDGE


Bldg 2 - 3rd Floor
14,880 FT² - PRODUCTION
#21 BREAKER
STAGING
93'
STAGING
STORAGE
BREAK ROOM
STAGING
#31 SHEETER
STORAGE
STORAGE
160'
#22 BREAKER
STAGING
INSP.
#36 TRIMMER
#30 SHEETER
STORAGE
REST ROOMS
INSPECTION
N
WELSH
BROWN-BRIDGE



Bldg 2 4th Floor

7192 FT² - OFFICE
7688 FT² - PRODUCTION
14,880 FT² - TOTAL

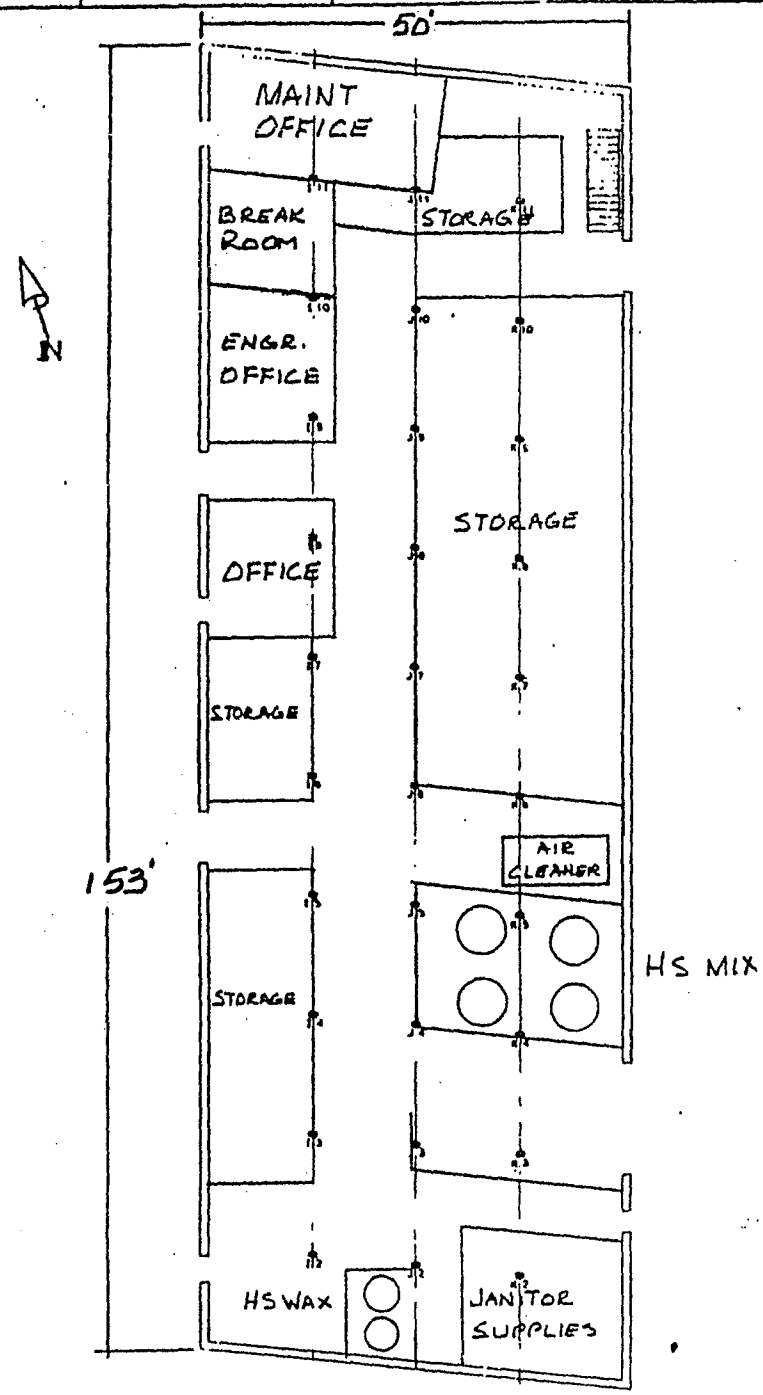


B/g 3 ground floor

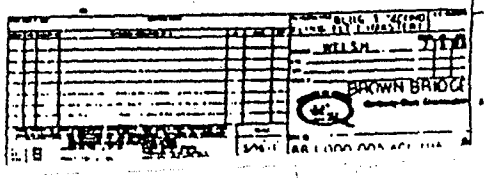
7665 FT² - PRODUCTION

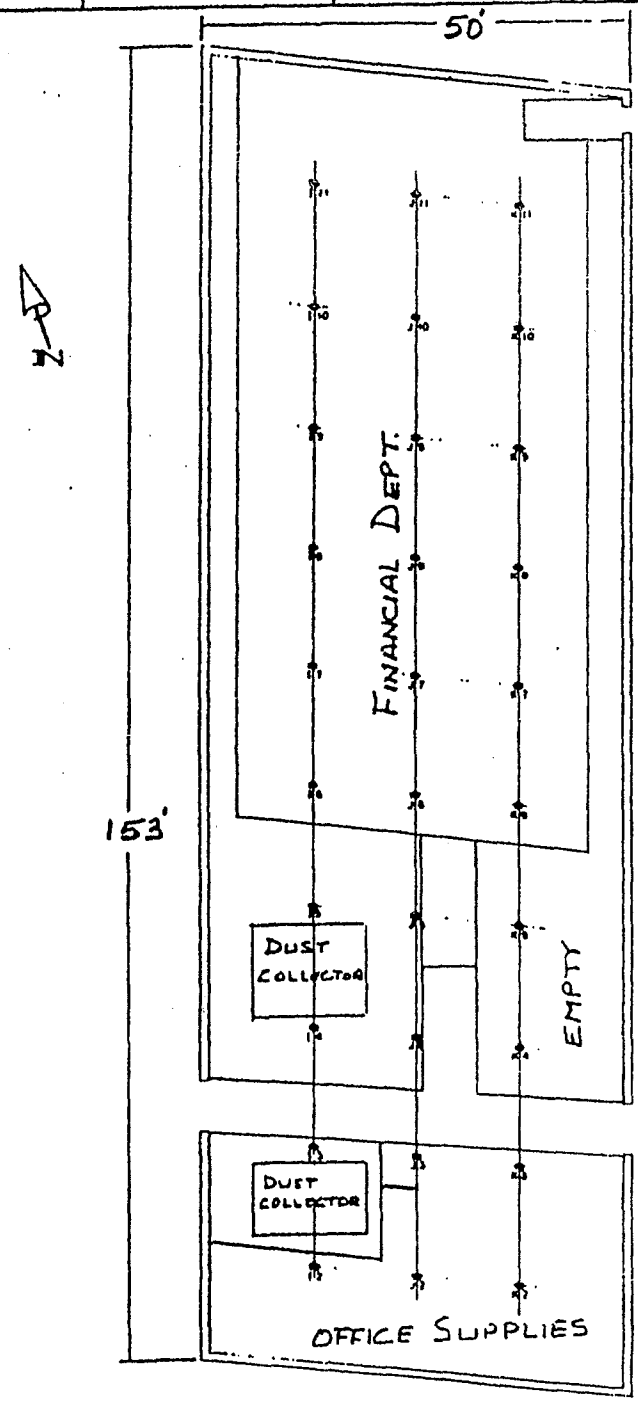
BROWN-BRIDGE

Blg 3 2nd floor



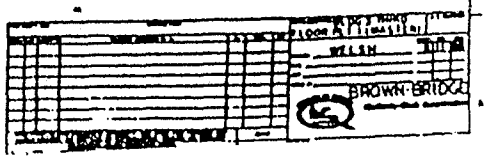
1703 FT² - OFFICE
5962 FT² - PRODUCTION
7,665 FT² - TOTAL

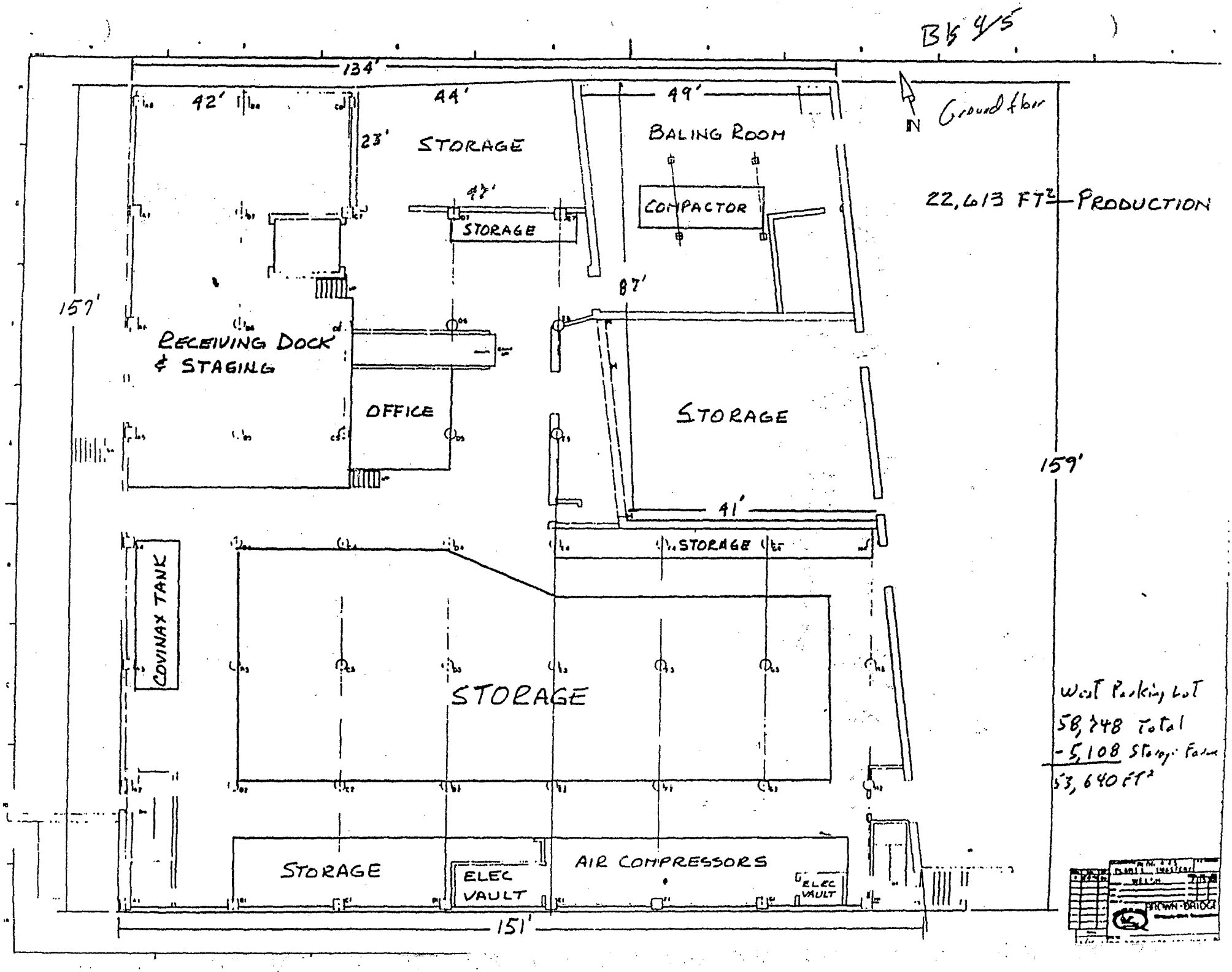


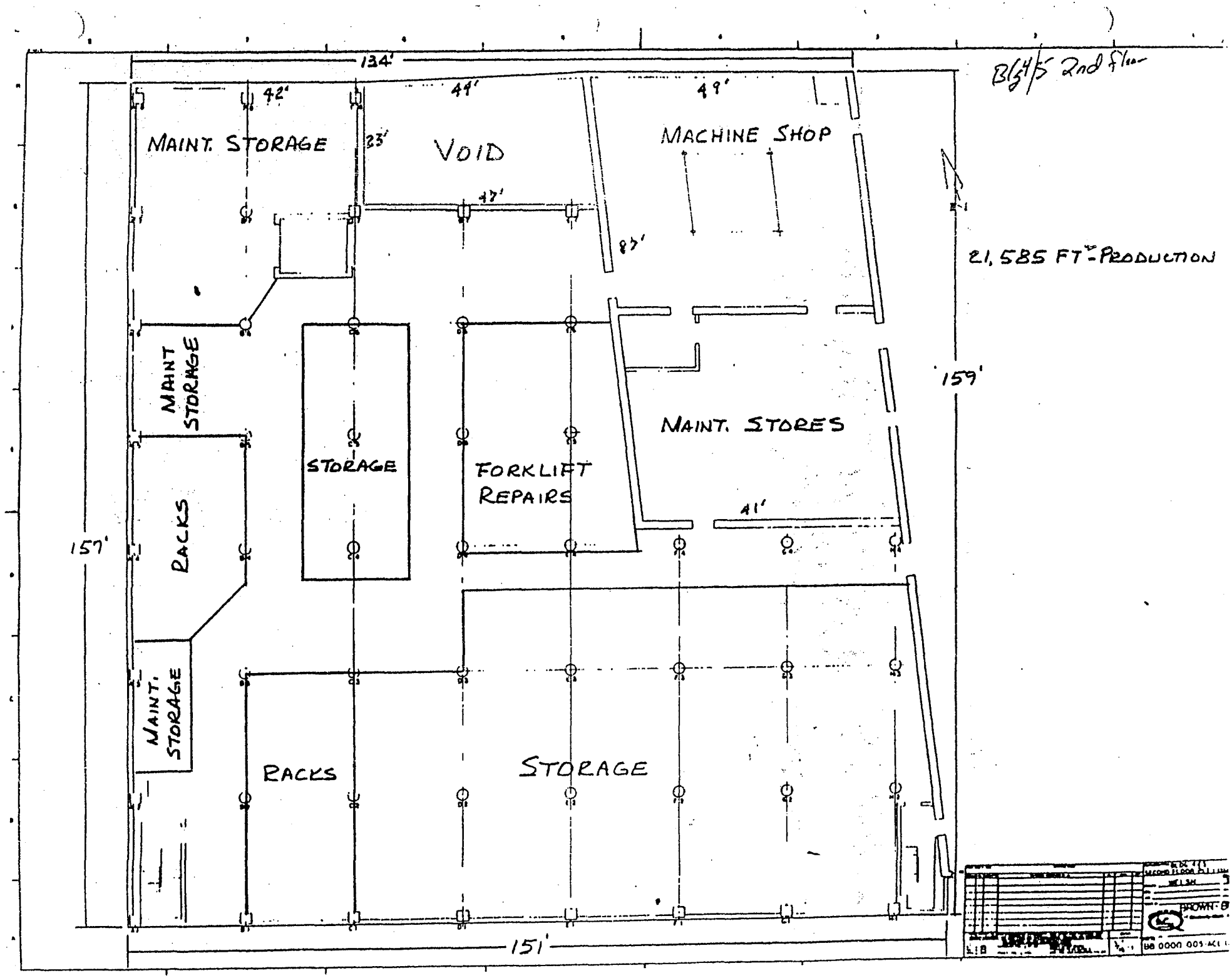


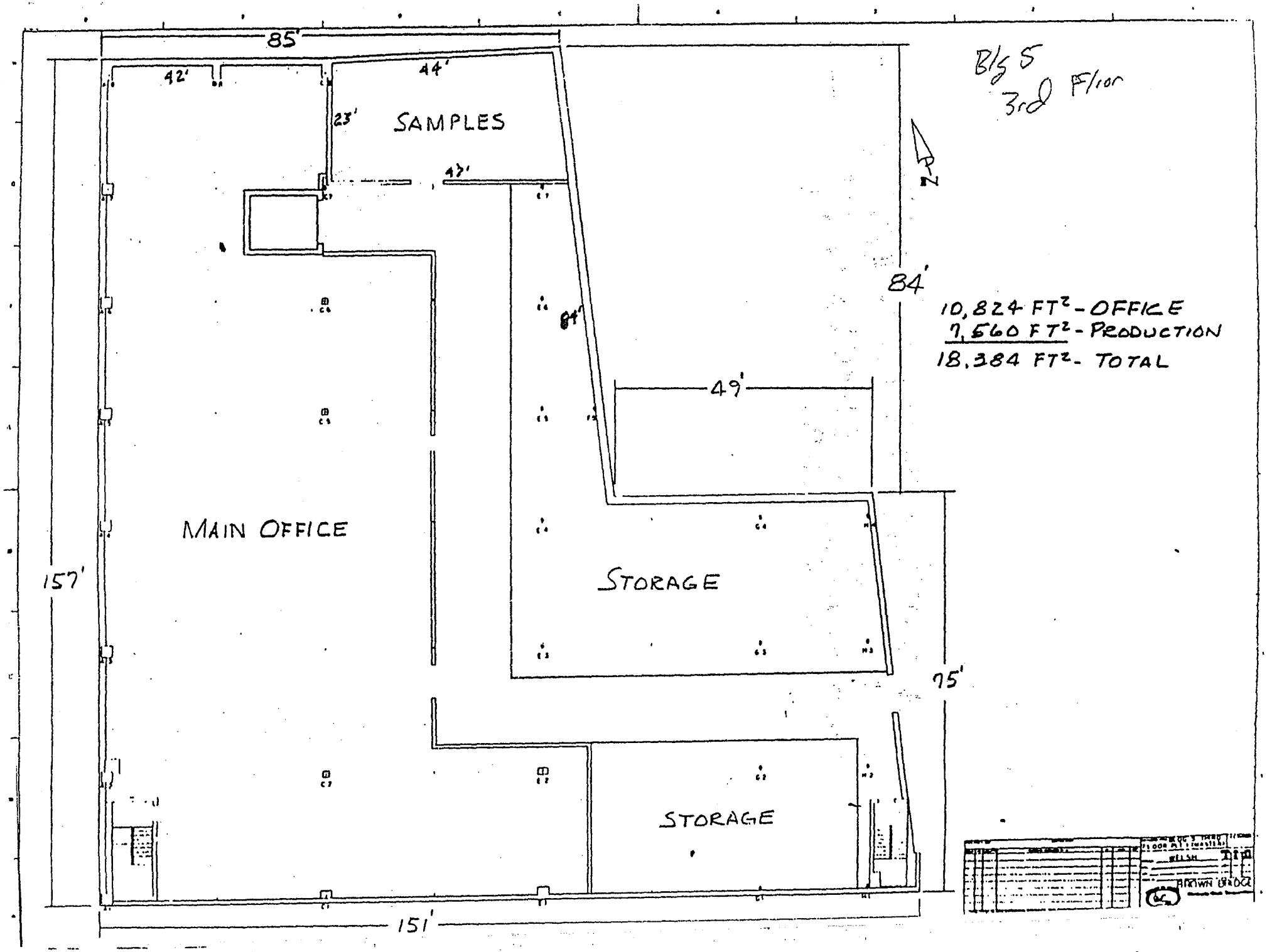
Blg. 3 - 3rd Floor

7665 FT² - OFFICE

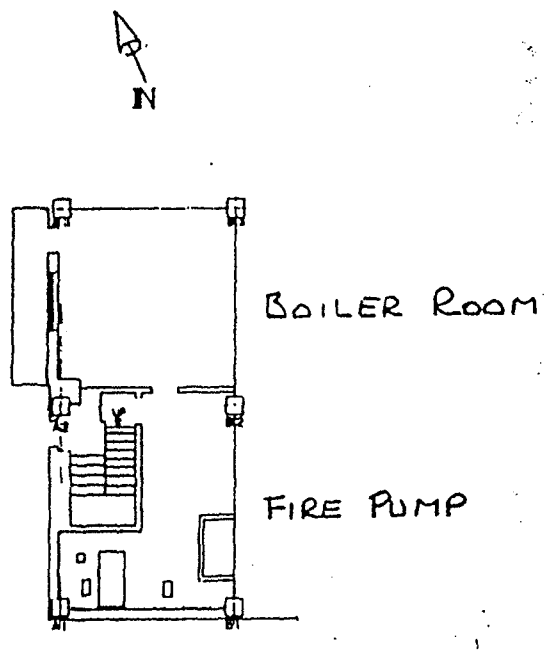



Bl 4/5
134'
42'
44'
49'
23'
STORAGE
BALING ROOM
N
Ground floor
22,613 FT² — PRODUCTION
47'
STORAGE
COMPACTOR
87'
157'
RECEIVING DOCK & STAGING
OFFICE
STORAGE
159'
41'
STORAGE
COVINAX TANK
STORAGE
West Parking Lot
58,748 Total
- 5,108 Storage Farm
53,640 FT²
STORAGE
ELEC VAULT
AIR COMPRESSORS
ELEC VAULT
151'
BROWN-BRIDGE


B/4/5 2nd floor
134'
42'
44'
49'
MAINT. STORAGE
23'
VOID
MACHINE SHOP
47'
83'
21,585 FT² - PRODUCTION
MAINT STORAGE
159'
MAINT. STORES
STORAGE
FORKLIFT REPAIRS
41'
157'
RACKS
MAINT. STORAGE
RACKS
STORAGE
151'


Bldg 5
3rd Floor
85'
42'
44'
23'
SAMPLES
42'
84'
84'
49'
MAIN OFFICE
STORAGE
STORAGE
157'
75'
151'
N
10,824 FT² - OFFICE
7,560 FT² - PRODUCTION
18,384 FT² - TOTAL

Bldg 5 sub-basement



BROWN · BRIDGE

08 0000 005-ACL 005

Appendix C
1994 Asbestos Survey Results for Plant No. 1

InterOffice

ANNEX 1

Kimberly-Clark Corporation

To: K. C. Caldabaugh

Location:

Date: August 23, 1994

From: J. E. Carter

Subject: ASBESTOS

Confirming our phone discussion yesterday about asbestos, our plan is as follows:

1. Remove asbestos insulation on drain trap identified by EEI's sample KC 11. Re-insulate with non-asbestos material.

2. Remove asbestos insulation on air handling unit identified by EEI's sample KC 10. Re-insulate with non-asbestos material.

3. Remove asbestos insulation on 50' of miscellaneous steam piping and re-insulate as required with non-asbestos material.

4. Repair cover material on asbestos insulation on 2,100' of steam piping including providing non-asbestos insulation at each pipe hanger.

All items will be done by a licensed contractor with permits obtained prior to beginning the work.

Items 1, 2 and 3 will be done by the end of August. Item 4 will be scheduled for September and will be paid for by Kimberly-Clark even if not done until after closing of the sale.

As I explained, our laboratory analysis by two different methods (PLM and TEM), showed only a trace (less than 1%) of asbestos content in the brown coat plaster ceilings. Therefore, we do not plan on do any work on these ceilings.

Attached are copies of the results from our two different sampling methods and a summary of the inspection by our corporate personnel.

Please call if you need any further information on our asbestos plan.

John

John E. Carter

JEC/tjb

InterOffice

Kimberly-Clark Corporation

TO: Wayne H. Deitrich

C: J. C. Morgenstern
W. J. Sharkey

FROM: Anthony L. Gasper

FAX COPY: J. E. CARTER 8/22/94

DATE: August 22, 1994

SUBJECT: BROWN-BRIDGE ASBESTOS SURVEY/EEI REPORT

Attached is a summary for my August 17 visit to Brown-Bridge to review the condition of asbestos-containing materials within the facility in response to the Environmental Enterprises, Inc. report of July 15, 1994.

There are no nonconformance issues relative to OSHA or EPA regulations reported in the EEI document. Similarly, I found the facility to be in conformance with OSHA requirements regarding asbestos.

The following recommendations are provided to ensure that friable asbestos fibers are not exposed to air and will not become airborne.

1) **Relative to the steam pipe insulation in Building 1, Ground Floor: Repair the fabric wrapping to eliminate the exposure of the asbestos pipe insulation to the air.** Estimated Cost: $7,500.00

2) **Relative to the four other insulation locations identified: Removal of these four isolated asbestos insulation runs is recommended.** Estimated Cost: $1,000.00.

Discussions with the asbestos abatement contractor indicates that Recommendation 2 could be completed in August through inclusion into the contract issued for the removal of the asbestos on the Building 2 fourth floor air handling unit. The other recommendation could be completed in September.

3) **It is recommended that no remedial action be taken relative to the ceiling surface brown coat plaster materials in the mezzanine area above the #2 and #4 coater or in the factory conference room.**

These plaster materials have been determined to be less than 1% asbestos, as confirmed by Transmission Electron Microscopy. As such, the plaster is not considered to be an asbestos containing material by the EPA or OSHA.

If I can be of further assistance in this matter, please let me know.

Anthony L. Gasper

Anthony L. Gasper P.E. C.I.H.
Occupational Safety and Health

TOTAL P.07

Environmental Enterprises Incorporated

TREATMENT FACILITY
4650 Spring Grove Ave.
Cincinnati, Ohio 45232
(513) 541 - 1823

EPA ID # : OHD 083377010

OFFICE / LABORATORY
10163 Cincinnati - Dayton Rd.
Cincinnati, Ohio 45241
(513) 772 - 2818

August 29, 1994

Grant Wilkinson, Esq.
University of Findlay
1000 North Main Street
Findlay, Ohio 45840

RE: Asbestos content of the brown coat ceiling surface material located above the #2 and #4 coater and in the factory conference room.

Dear Mr. Wilkinson:

Upon review of the data supplied by the Kimberly-Clark Corporation which confirms the asbestos content of the plaster materials to be less than 1% by Transmission Electron Microscopy Environmental Enterprises Inc. is prepared to amend the July 15, 1994, survey report if desired. Recommendations made in the survey report were based on asbestos content guidelines established by the EPA 40 CFR Part 763, which is any material analyzed by polarized light microscopy containing more than 1 percent asbestos and the OSHA 29 CFR 1926.58, any material containing more than 0.1 percent by weight.

As of the August 10, 1994, Federal Register, 29 CFR 1926.1101, OSHA has changed its definition of asbestos-containing material to any material which contains amounts of asbestos greater than 1 percent. The effective date of this standard is October 11, 1994. Prior to this date materials reported as containing trace amounts of asbestos are regulated by OSHA unless otherwise analyzed and specifically reported to be less than 0.1 by weight.

The painted ceiling surface brown coat plaster material located on the second level mezzanine of building #2 should also be reanalyzed by more accurate methods to confirm whether the asbestos content is below 1 percent. If this information is desired we

Printed On Recycled and Recyclable Paper

COMPREHENSIVE ASBESTOS SURVEY REPORT

KIMBERLY-CLARK CORPORATION

BROWN-BRIDGE FACILITIES
TROY, OHIO

DATE OF INSPECTION AND SURVEY: JULY 6, 1994

DATE OF FINAL REPORT: JULY 15, 1994

INVESTIGATORS:

ENVIRONMENTAL ENTERPRISES, INC.
Environmental Assessment Group

Mark B. Kimura, BS, IH

Mr. Mark Koetter, IHT

ASBESTOS CONTAINING HOMOGENEOUS AREAS DOCUMENTED BY KIMBERLY-CLARK CORPORATION

BUILDING 1A

GROUND LEVEL

* Thermal System Pipe Insulation
* Thermal System Boiler Stack Insulation

SECOND LEVEL

* Thermal System Glue Tank Insulation

ROOF

* Miscellaneous Built-up Roofing Materials

BUILDING 1

GROUND LEVEL

* Thermal System Roof Drain Insulation
* Thermal System Pipe Insulation
* Thermal System Boiler Stack Insulation

ASBESTOS CONTAINING HOMOGENEOUS AREAS
DOCUMENTED BY KIMBERLY-CLARK CORPORATION

BUILDING #2

GROUND LEVEL

* Thermal System Oven Insulation
* Acoustical Ceiling Surface Plaster Material

SECOND LEVEL MEZZANINE

* Case Door Insulation #2 Coater
* Thermal System Oven Insulation #4 Coater

THIRD LEVEL

* Thermal System Pipe Insulation

FOURTH LEVEL

* Acoustical Ceiling Surface Plaster Material
* Thermal System Pipe Insulation

BUILDING 3

GROUND LEVEL

* Thermal System Pipe Insulation
* Miscellaneous Transite Board

ASBESTOS CONTAINING HOMOGENEOUS AREAS
DOCUMENTED BY
ENVIRONMENTAL ENTERPRISES, INC.

7 areas

BUILDING 1A

BASEMENT LEVEL

* Fire Door Insulation

GROUND LEVEL

* Thermal System Trap Insulation

SECOND LEVEL

* Fire Door Insulation

ROOF

* Miscellaneous Built-up Roofing Materials

BUILDING #2

BASEMENT BOILER ROOM

* Fire Door Insulation

SECOND LEVEL FACTORY CONFERENCE ROOM CAGE AREA

* Ceiling Surface Brown Coat Plaster Material

* Miscellaneous Floor Tile Material

SECOND LEVEL MEZZANINE

* Ceiling Surface Brown Coat Plaster Material

* Painted Ceiling Surface Brown Coat Material

* Fire Door Insulation

THIRD LEVEL

* Fire Door Insulation

FOURTH LEVEL

* Thermal System AHU Panel Insulation

BUILDING 4

BOILER ROOM

* Fire Door Insulation

MAINTENANCE SHOP

* Fire Door Insulation

BUILDING 5

SECOND LEVEL

* Fire Door Insulation

ASBESTOS MATERIALS ESTIMATED ABATEMENT COST
FOR
MATERIALS DOCUMENTED BY KIMBERLY-CLARK

LOCATION: BUILDING 1A, GROUND LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
THERMAL SYSTEM PIPE INSULATION	1 LINEAR FOOT	$15.00/LF	$15.00
THERMAL SYSTEM BOILER STACK INSULATION	55 SQUARE FEET	$15.00/SF	$825.00
TOTAL COST			$840.00

LOCATION: BUILDING 1A, SECOND LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
THERMAL SYSTEM GLUE TANK INSULATION	112 SF	$15.00/SF	$1,680.00
TOTAL COST			$1,680.00

LOCATION: BUILDING 1, GROUND LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
THERMAL SYSTEM PIPE INSULATION	2,176 LF	$15.00/LF	$32,640.00
THERMAL SYSTEM BOILER STACK INSULATION	52 SF	$15.00/SF	$780.00
TOTAL COST			$33,420.00

LOCATION: BUILDING #2, GROUND LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
THERMAL SYSTEM OVEN INSULATION	2,747 SF	$15.00/LF	$41,205.00
ACOUSTICAL CEILING SURFACE PLASTER MATERIAL	560 SF	$15.00/SF	$8,400.00
TOTAL COST			$49,605.00

LOCATION: BUILDING #2, SECOND LEVEL MEZZANINE

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
THERMAL SYSTEM CASE DOOR #2 COATER	153 SF	$15.00/SF	$2,295.00
THERMAL SYSTEM OVEN INSULATION #4 COATER	1,906 SF	$15.00/SF	$28,590.00
TOTAL COST			$30,885.00

LOCATION: BUILDING #2, THIRD LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
THERMAL SYSTEM PIPE INSULATION	13 LF	$15.00/SF	$195.00
TOTAL COST			$195.00

LOCATION: BUILDING #2, FOUR LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
ACOUSTICAL CEILING SURFACE PLASTER MATERIAL	2,954 SF	$15.00/SF	$44,310.00
THERMAL SYSTEM PIPE INSULATION	7 LF	$15.00/SF	$105.00
TOTAL COST			$44,415.00

LOCATION: BUILDING #3, GROUND LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
THERMAL SYSTEM PIPE INSULATION	29 LF	$15.00/SF	$435.00
MISCELLANEOUS TRANSITE BOARD MATERIAL	148 SF	$4.00/SF	$592.00
TOTAL COST			$1,027.00

TOTAL ESTIMATED ABATEMENT COST	$162,067.00

ASBESTOS MATERIALS ESTIMATED ABATEMENT COST
FOR
MATERIALS DOCUMENTED BY ENVIRONMENTAL ENTERPRISES, INC

LOCATION: BUILDING 1A, BASEMENT LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
FIRE DOORS	2 DOORS	$200.00/DOOR	$400.00
TOTAL COST			$400.00

LOCATION: BUILDING 1A, GROUND LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
THERMAL SYSTEM TRAP INSULATION	2 PIPE JOINTS	$15.00/PJ	$30.00
TOTAL COST			$30.00

LOCATION: BUILDING 1A, SECOND LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
FIRE DOORS	5 DOORS	$200.00/DOOR	$1,000.00
TOTAL COST			$1,000.00

LOCATION: BUILDING 1A, ROOF

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
MISCELLANEOUS ROOFING FELT MATERIAL	5,000 SF	$4.00/SF	$17,500.00
TOTAL COST			$17,500.00

LOCATION: BUILDING 1, GROUND LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
THERMAL SYSTEM ROOF DRAIN INSULATION	170 LF	$15.00/LF	$2,550.00
TOTAL COST			$2,550.00

LOCATION: BUILDING #2, BASEMENT LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
FIRE DOORS	2 DOORS	$200.00/DOOR	$400.00
TOTAL COST			$400.00

LOCATION: BUILDING #2, SECOND LEVEL FACTORY CONFERENCE ROOM CAGE AREA

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
CEILING SURFACE BROWN COAT PLASTER MATERIAL	800 SF	$15.00/SF	$12,000.00
MISCELLANEOUS FLOOR TILE	969 SF	$3.00/SF	$2,907.00
TOTAL COST			$14,907.00

LOCATION: BUILDING #2, SECOND LEVEL MEZZANINE

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
CEILING SURFACE BROWN COAT PLASTER MATERIAL	2,880 SF	$15.00/SF	$43,200.00
PAINTED CEILING SURFACE BROWN COAT PLASTER MATERIAL	10,740 SF	$15.00/SF	$161,100.00
FIRE DOOR	1 DOOR	$200.00/DOOR	$200.00
TOTAL COST			$204,500.00

LOCATION: BUILDING #2, THIRD LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
FIRE DOORS	2 DOORS	$200.00/DOOR	$400.00
TOTAL COST			$400.00

LOCATION: BUILDING #2, FOUR LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
THERMAL SYSTEM AHU PANEL INSULATION	196 SF	$15.00/SF	$2,940.00
TOTAL COST			$2,940.00

LOCATION: BUILDING #4, BOILER ROOM

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
FIRE DOOR	1 DOOR	$200.00/DOOR	$200.00
TOTAL COST			$200.00

LOCATION: BUILDING #4, MAINTENANCE SHOP

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
FIRE DOOR	1 DOOR	$200.00/DOOR	$200.00
TOTAL COST			$200.00

LOCATION: BUILDING #5, SECOND LEVEL

MATERIAL TYPE	QUANTITIES	REMOVAL COST	TOTAL COST
FIRE DOOR	1 DOOR	$200.00/DOOR	$200.00
TOTAL COST			$200.00
TOTAL ESTIMATED ABATEMENT COST			$245,227.00
GRAND TOTAL ESTIMATED ASBESTOS ABATEMENT COST			$407,294.00

Appendix D
Information from Previous Investigations

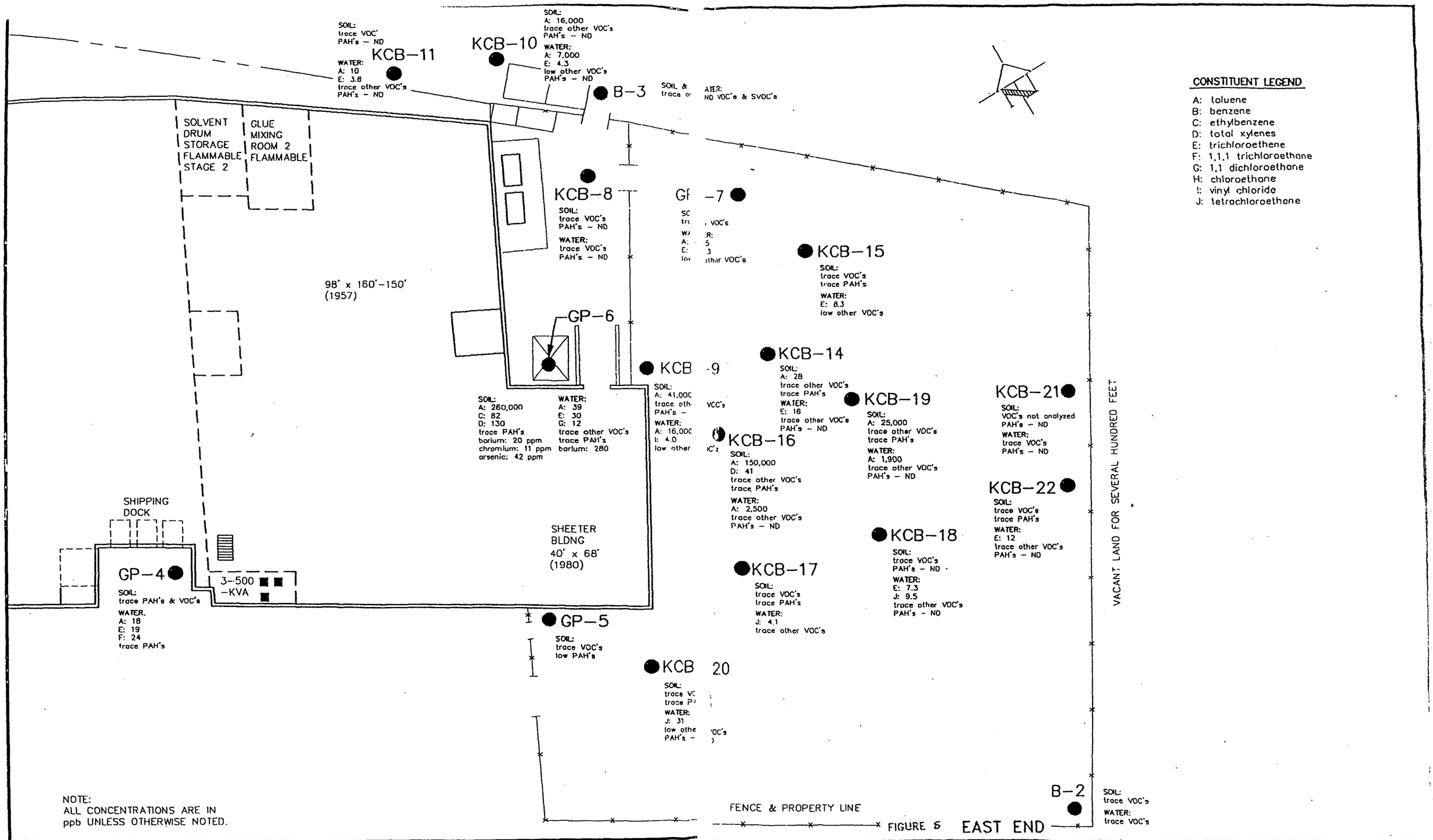
SITE INVESTIGATIONS AND REMEDIATION RECOMMENDATIONS

Brown-Bridge Facility

Troy, Ohio

Kimberly-Clark Corporation

November 1993



NOTE:
ALL CONCENTRATIONS ARE IN ppb UNLESS OTHERWISE NOTED.

FIGURE 5

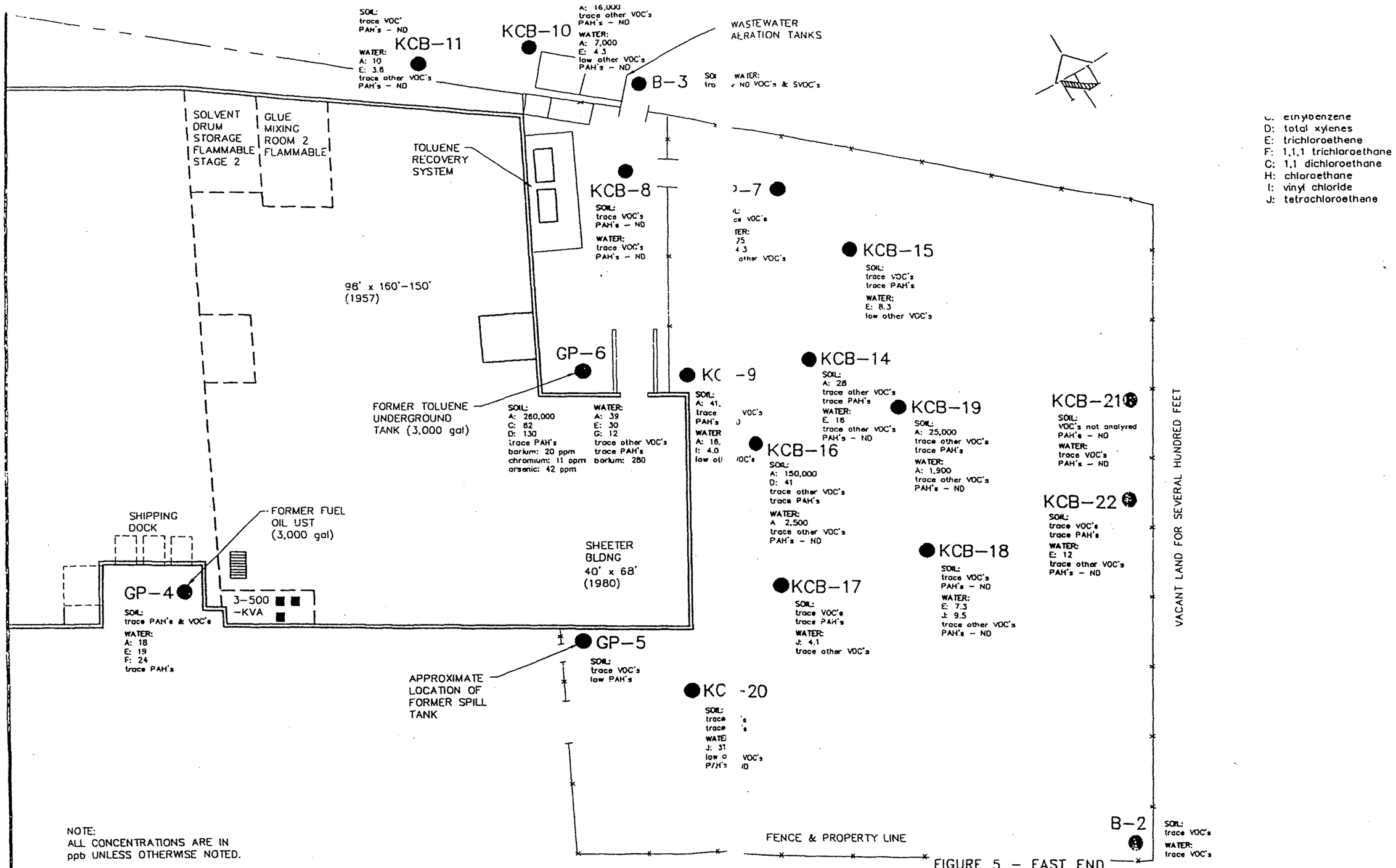
SCALE NOT TO SCALE	NO.	DATE	REVISION	DESCRIPTION
DWN. BY BAA				
CHK'D. BY KMK				
APPR. BY SM				

Applied Engineering & Science

Atlanta Georgia

TOLUENE RECOVERY SYSTEM
CONTAMINANT CONCENTRATIONS
KIMBERLY–CLARK CORPORATION
BROWN–BRIDGE PLANT 1, TROY, OHIO

DATE NOV. 19, 1993
DWG. NO. 3326A102
SHEET NO. 4



C: ethylbenzene
D: total xylenes
E: trichloroethene
F: 1,1,1 trichloroethane
G: 1,1 dichloroethane
H: chloroethane
I: vinyl chloride
J: tetrachloroethane

NOTE:
ALL CONCENTRATIONS ARE IN
ppb UNLESS OTHERWISE NOTED.

FIGURE 5 – EAST END

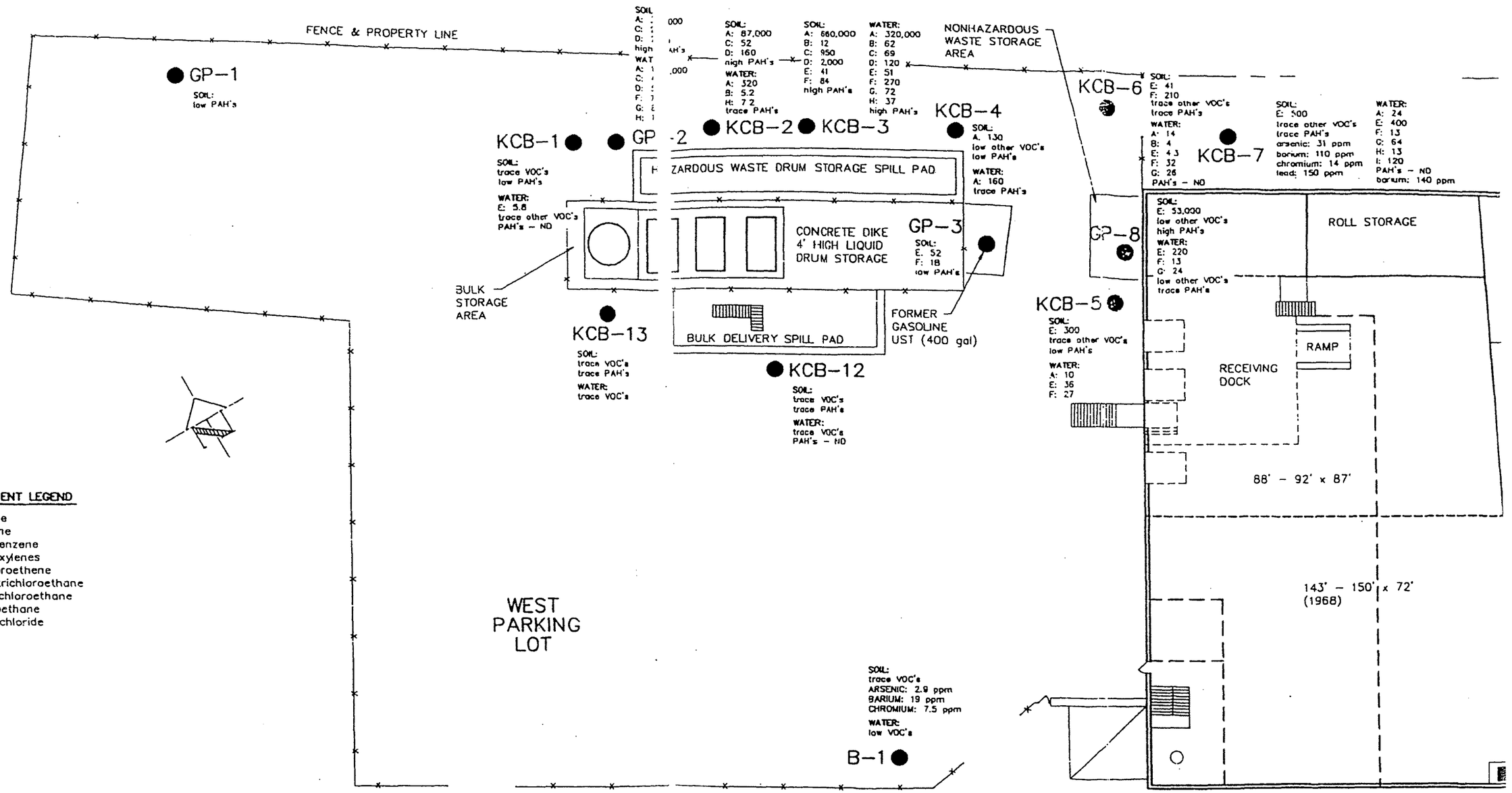
SCALE NOT TO SCALE	NO.	DATE	REVISION DESCRIPTION
DWN. BY BAA			
CHK'D. BY KMK			
APPR. BY SM			

Applied Engineering Science

Atlanta Georgia

TOLUENE RECOVERY SYSTEM
CONTAMINANT CONCENTRATIONS
KIMBERLY–CLARK CORPORATION
BROWN–BRIDGE PLANT 1, TROY, OHIO

DATE NOV. 23, 199
DWG. NO. 3326A102
SHEET NO.



CONSTITUENT LEGEND

A: toluene
B: benzene
C: ethylbenzene
D: total xylenes
E: trichloroethene
F: 1,1,1 trichloroethane
G: 1,1 dichloroethane
H: chloroethane
I: vinyl chloride

NOTE:
ALL CONCENTRATIONS ARE IN PPB UNLESS OTHERWISE NOTED.

FIGURE 3 - WEST END

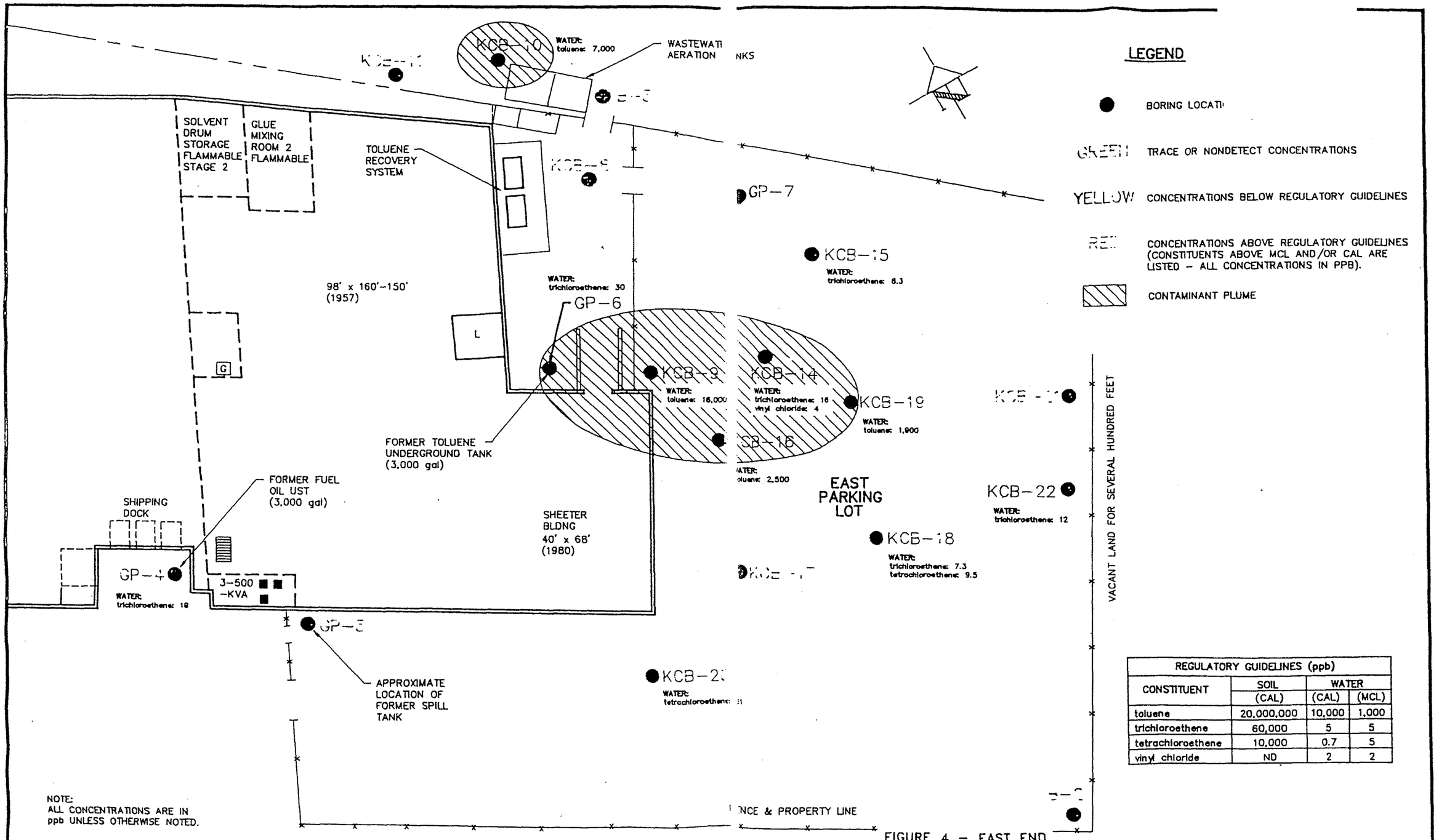
SCALE NOT TO SCALE	NO.	DATE	REVISION	DESCRIPTION
DWN. BY BAA				
CHK'D. BY KMK				
APPR. BY SM				

Applied Engineering Science

Atlanta Georgia

BULK AND HAZARDOUS WASTE STORAGE AREAS
CONTAMINANT CONCENTRATIONS
KIMBERLY-CLARK CORPORATION
BROWN-BRIDGE PLANT 1, TROY, OHIO

DATE NOV. 23, 199
DWG. NO. 3326A103
SHEET NO.



REGULATORY GUIDELINES (ppb)			
CONSTITUENT	SOIL	WATER	
	(CAL)	(CAL)	(MCL)
toluene	20,000,000	10,000	1,000
trichloroethene	60,000	5	5
tetrachloroethene	10,000	0.7	5
vinyl chloride	ND	2	2

NOTE:
ALL CONCENTRATIONS ARE IN ppb UNLESS OTHERWISE NOTED.

FIGURE 4 - EAST END

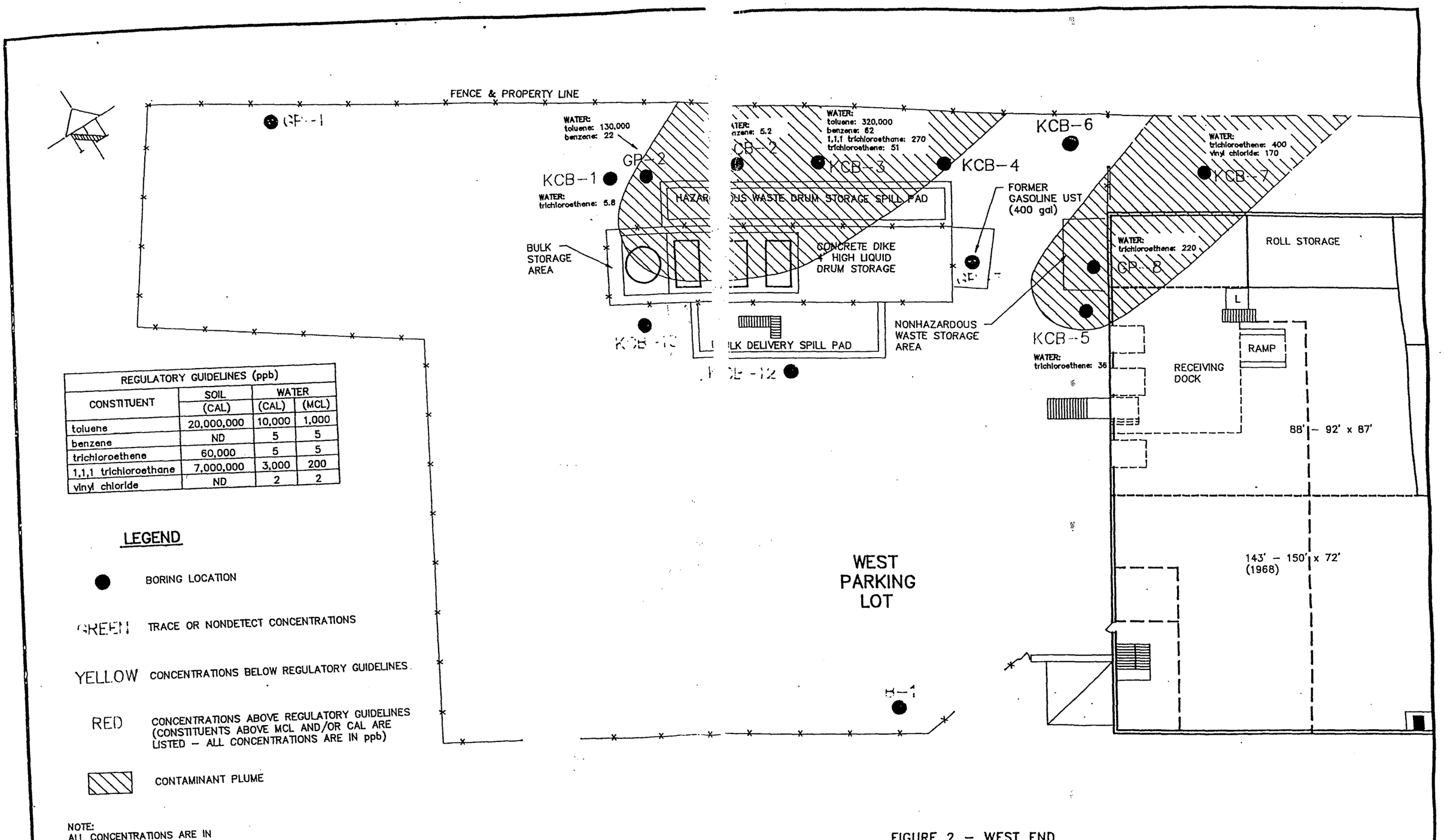
SCALE NOT TO SCALE	NO.	DATE	REVISION	DESCRIPTION
DWN. BY BAA				
CHK'D. BY KMK				
APPR. BY SM				

Applied Engineering & Science

Atlanta Georgia

TOLUENE RECOVERY SYSTEM
CONTAMINANT PLUME
KIMBERLY-CLARK CORPORATION
BROWN-BRIDGE PLANT 1, TROY, OHIO

DATE NOV. 23, 1993
DWG. NO. 3326A104
SHEET NO.



REGULATORY GUIDELINES (ppb)			
CONSTITUENT	SOIL (CAL)	WATER (CAL)	WATER (MCL)
toluene	20,000,000	10,000	1,000
benzene	ND	5	5
trichloroethene	60,000	5	5
1,1,1 trichloroethane	7,000,000	3,000	200
vinyl chloride	ND	2	2

LEGEND

● BORING LOCATION

GREEN TRACE OR NONDETECT CONCENTRATIONS

YELLOW CONCENTRATIONS BELOW REGULATORY GUIDELINES

RED CONCENTRATIONS ABOVE REGULATORY GUIDELINES (CONSTITUENTS ABOVE MCL AND/OR CAL ARE LISTED – ALL CONCENTRATIONS ARE IN ppb)

CONTAMINANT PLUME

NOTE:
ALL CONCENTRATIONS ARE IN ppb UNLESS OTHERWISE NOTED.

FIGURE 2 – WEST END

SCALE NOT TO SCALE	NO.	DATE	REVISION	DESCRIPTION
DWN. BY BAA				

Applied Engineering & Science

Atlanta Georgia

BULK AND HAZARDOUS WASTE STORAGE AREAS
CONTAMINANT PLUME
KIMBERLY-CLARK CORPORATION
BROWN-BRIDGE PLANT 1, TROY, OHIO

DATE NOV. 23, 1993
DWG. NO. 3326A105
SHEET NO.

APPLIED
ENGINEERING
SCIENCE, INC.

SOIL SAMPLIN
RESULTS
HOBART UST
AND RAIL SPU
PROPERTY

Brown-Bridge
Facility

Troy, Ohio

Kimberly-Clark
Corporation

June 1994

SOIL SAMPLING RESULTS
HOBART UST AND RAIL SPUR PROPERTY

BROWN-BRIDGE FACILITY

TROY, OHIO

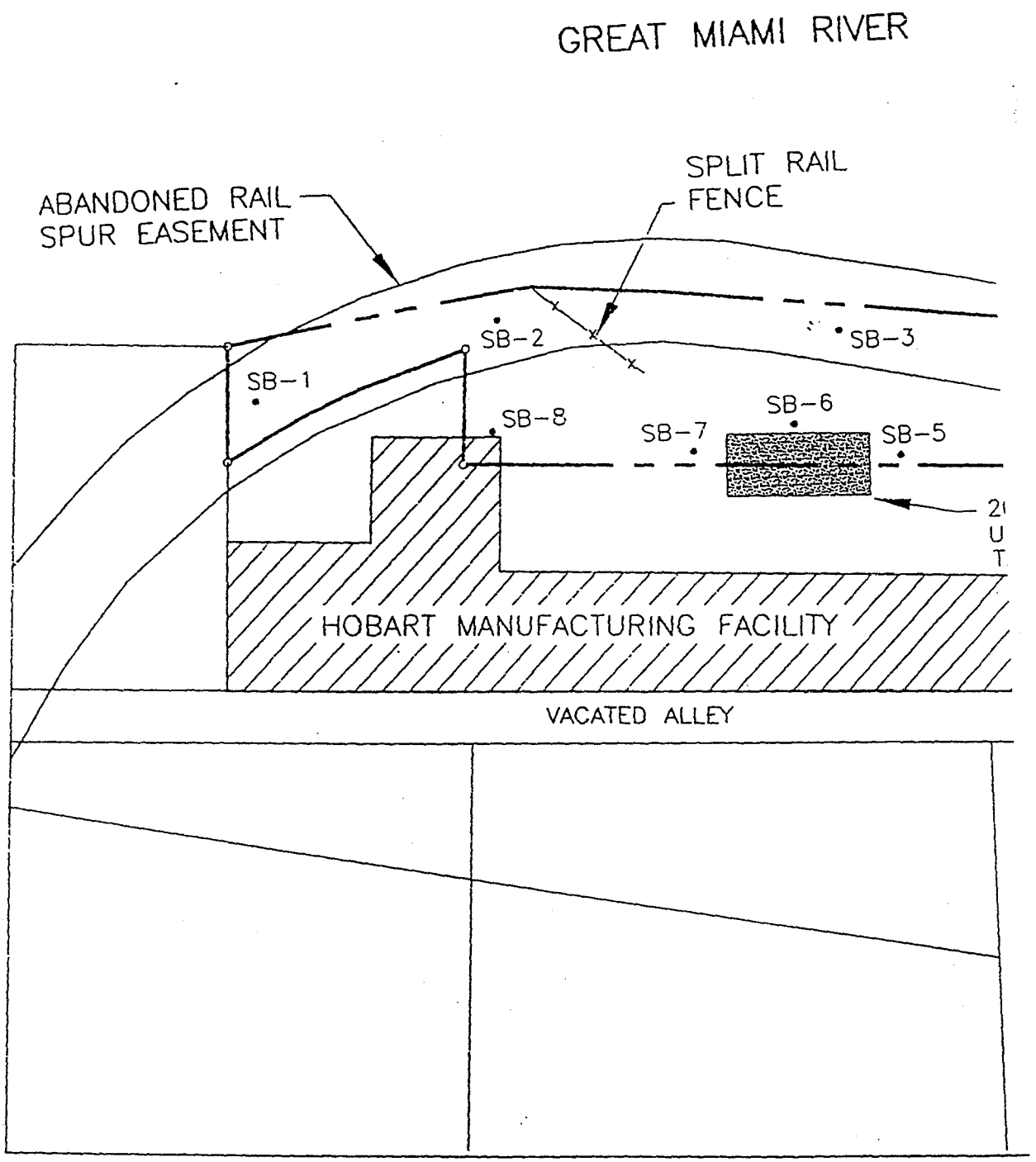
Prepared for:

KIMBERLY-CLARK CORPORATION

June, 1994

Prepared by:

Applied Engineering & Science, Inc.
Atlanta, Georgia



LEGEND

• SB-1 SOIL BORING LOCATION

SCALE		NO.	DATE	REVISION DESCRIPTION
APPROX. 1"=40'				
DWN. BY	KMK			
CHK'D. BY	GEW			

Applied Engineerin Science

3326A003.DWG

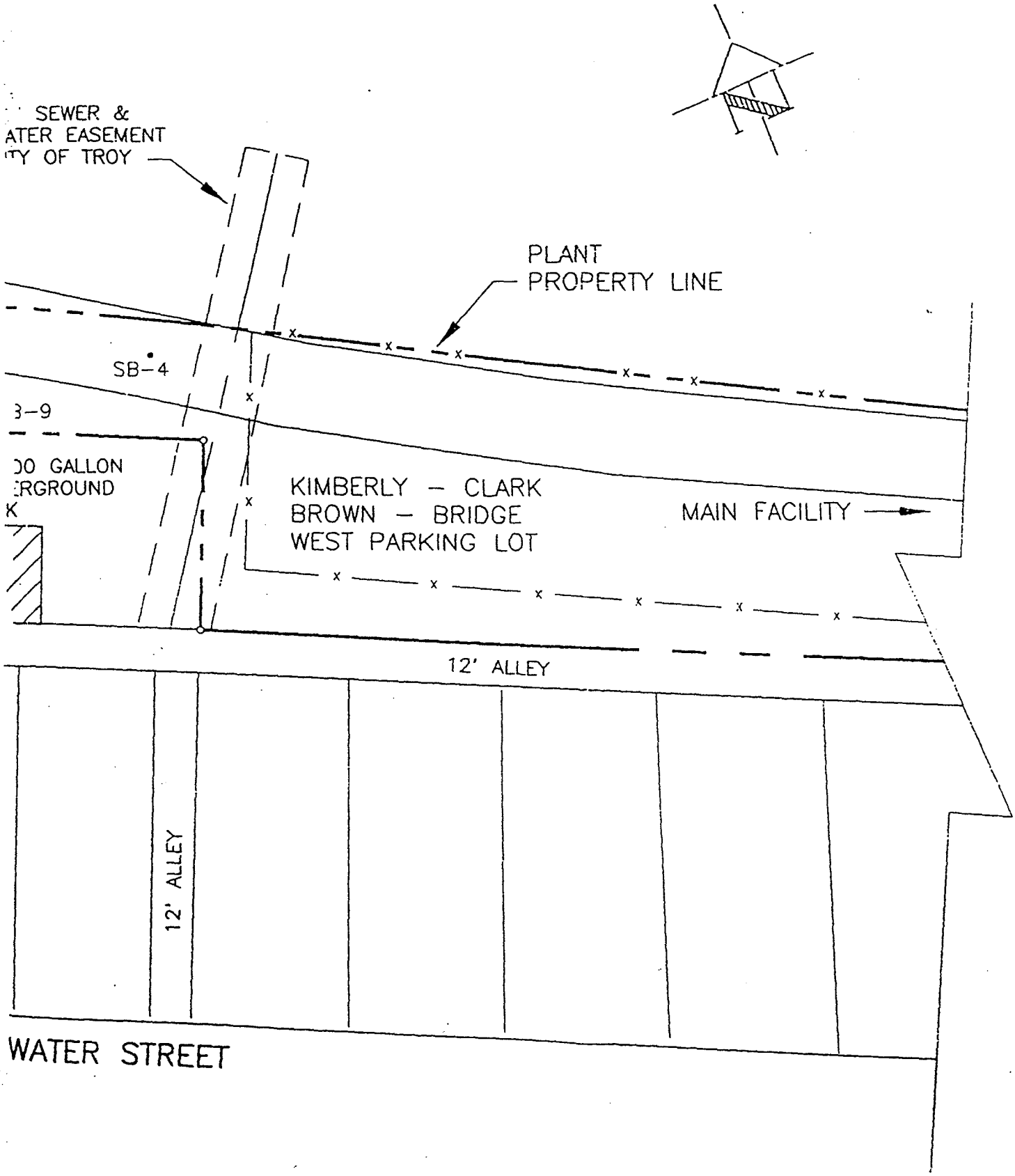


FIGURE 1

Atlanta & Georgia	SOIL BORING LOCATION MAP KIMBERLY-CLARK CORPORATION BROWN-BRIDGE PLANT 1, TROY OHIO	DATE JUNE, 1 DWG. N 3326A SHEET

TABLE 1 (CONTINUED)
KIMBERLY-CLARK CORPORATION
BROWN-BRIDGE MAIN PLANT
TROY, OHIO
AES/May 24-25, 1994

Soil Borings ID	SB1-3'	SB2-3'	SB3-2.3'	SB4-2.5'	SB5-10'	SB6-10'	SB7-10'	SB8-2'	SB9-3'	CAL
TPH (8015)										
Gasoline	ND	ND	ND	ND	ND	ND	ND	ND	ND	NRL
Kerosene	ND	ND	ND	ND	ND	ND	ND	ND	ND	NRL
Diesel	ND	ND	ND	ND	ND	ND	ND	ND	ND	NRL

All concentrations reported in µg/kg (ppb)
ND - Not detected
NRL - No regulatory level exists
[1] - Proposed July 27, 1990, Federal Corrective Action Level

TABLE 1
KIMBERLY-CLARK CORPORATION
BROWN-BRIDGE MAIN PLANT
TROY, OHIO
AES/May 24-25, 1994

Soil Borings ID	SB1-3'	SB2-3'	SB3-2.3'	SB4-2.5'	SB5-10'	SB6-10'	SB7-10'	SB8-2'	SB9-3'	CAL
VOC'S (EPA-8260)										
Benzene	ND	ND	ND	11	ND	ND	ND	ND	ND	NRL
CIS-1,2-Dichloroethene	ND	ND	ND	26	ND	ND	ND	ND	ND	NRL
Methylene Chloride	16	14	ND	15	ND	ND	ND	ND	ND	90,000[1]
Napthalene	ND	ND	ND	81	ND	ND	ND	ND	ND	NRL
Trichloroethene	ND	ND	640	12,000	ND	9.0	58	500	ND	60,000[1]
1,2,3 Trichlorobenzene	8	6.3	ND	7	ND	ND	ND	ND	ND	NRL
1,2,4, Trichlorobenzene	6	ND	ND	5	ND	ND	ND	ND	ND	2,000,000[1]
1,1,2, Trichloroethane	ND	ND	ND	160	ND	ND	ND	ND	ND	1,000,000[1]
Tetrachloroethene	ND	ND	200	240	ND	6.0	24	470	ND	10,000[1]
Toluene	8	ND	ND	20	ND	ND	ND	31	ND	20,000,000[1]
Xylene	ND	ND	ND	13	ND	ND	ND	ND	ND	200,000,000[1]

All concentrations reported in µg/kg (ppb)
ND - Not detected
NRL - No regulatory level exists
[1] - Proposed July 27, 1990, Federal Corrective Action Level

TABLE 1 (CONTINUED)
KIMBERLY-CLARK CORPORATION
BROWN-BRIDGE MAIN PLANT
TROY, OHIO
AES/May 24-25, 1994

Soil Borings ID	SB1-3'	SB2-3'	SB3-2.3'	SB4-2.5'	SB5-10'	SB6-10'	SB7-10'	SB8-2'	SB9-3'	CAL
SVOC's (EPA-8270)										
Anthracene	ND	ND	ND	2450	ND	ND	ND	ND	ND	NRL
Acenaphthylene	ND	ND	ND	1300	ND	ND	ND	ND	ND	NRL
Benzo (A) Anthracene	5300	ND	ND	16,100	ND	ND	ND	1200	ND	NRL
Benzo (G,H,I) Perylene	7000	ND	ND	8,500	ND	ND	ND	1370	ND	NRL
Benzo (A) Pyrene	6710	ND	ND	13,500	ND	ND	ND	1020	ND	NRL
Benzo (B) Fluoranthene	8030	ND	ND	16,500	ND	ND	ND	ND	ND	NRL
Benzo (K) Fluoranthene	4460	ND	ND	9,260	ND	ND	ND	1040	ND	NRL
Chrysene	6200	ND	ND	11,900	ND	ND	ND	1160	ND	NRL
Dibenzo (A,H) Anthlacene	2340	ND	ND	5,450	ND	ND	ND	1130	ND	NRL
Fluoranthene	5100	ND	ND	16,200	ND	ND	ND	1690	ND	NRL
Ideno (1,2,3-CD) Pyrene	6740	ND	ND	11,800	ND	ND	ND	ND	ND	NRL
Phenanthrene	1050	ND	ND	6,530	ND	ND	ND	1670	ND	NRL
Pyrene	6950	ND	ND	23,200	ND	ND	ND	1830	ND	NRL

All concentrations reported in µg/kg (ppb)
ND - Not detected
NRL - No regulatory level exists
[1] - Proposed July 27, 1990, Federal Corrective Action Level

Applied Engineering & Science, Inc.

Perimeter Crest Office Park
2261 Perimeter Park Drive
Atlanta, Georgia 30341

Telephone (770) 454-1810
FAX (770) 454-1816
Internet: appengsci@aol.com

Engineering &
Environmenta
Consultants

March 27, 1998

Mr. Grant W. Wilkinson, Esq.
Attorney-At-Law
5944 Wakefield Drive
Toledo, Ohio 43560

3326M

RE: Sample Results – Hobart UST
Troy, Ohio

Dear Mr. Wilkinson:

Enclosed is a copy of the report describing the soil sampling completed near the Hobart UST, formerly on Brown-Bridge property. The sampling was more extensive than I remembered and included samples collected near the tank and from the former rail spur that ran along the back of the Hobart property. Polynuclear aromatic hydrocarbons (PAHs), very common constituents along rail lines, were detected and some volatile organic compounds (VOCs), which supports our position that at least some of the VOCs present in groundwater beneath the Brown-Bridge property originate from off-site sources.

Please let me know if you need any additional information.

Sincerely,

Steve McFadden

Steve McFadden
Vice President
Environmental Services

cc. Cindy Jernigan

Enclosure

3326M\cor\wilken1

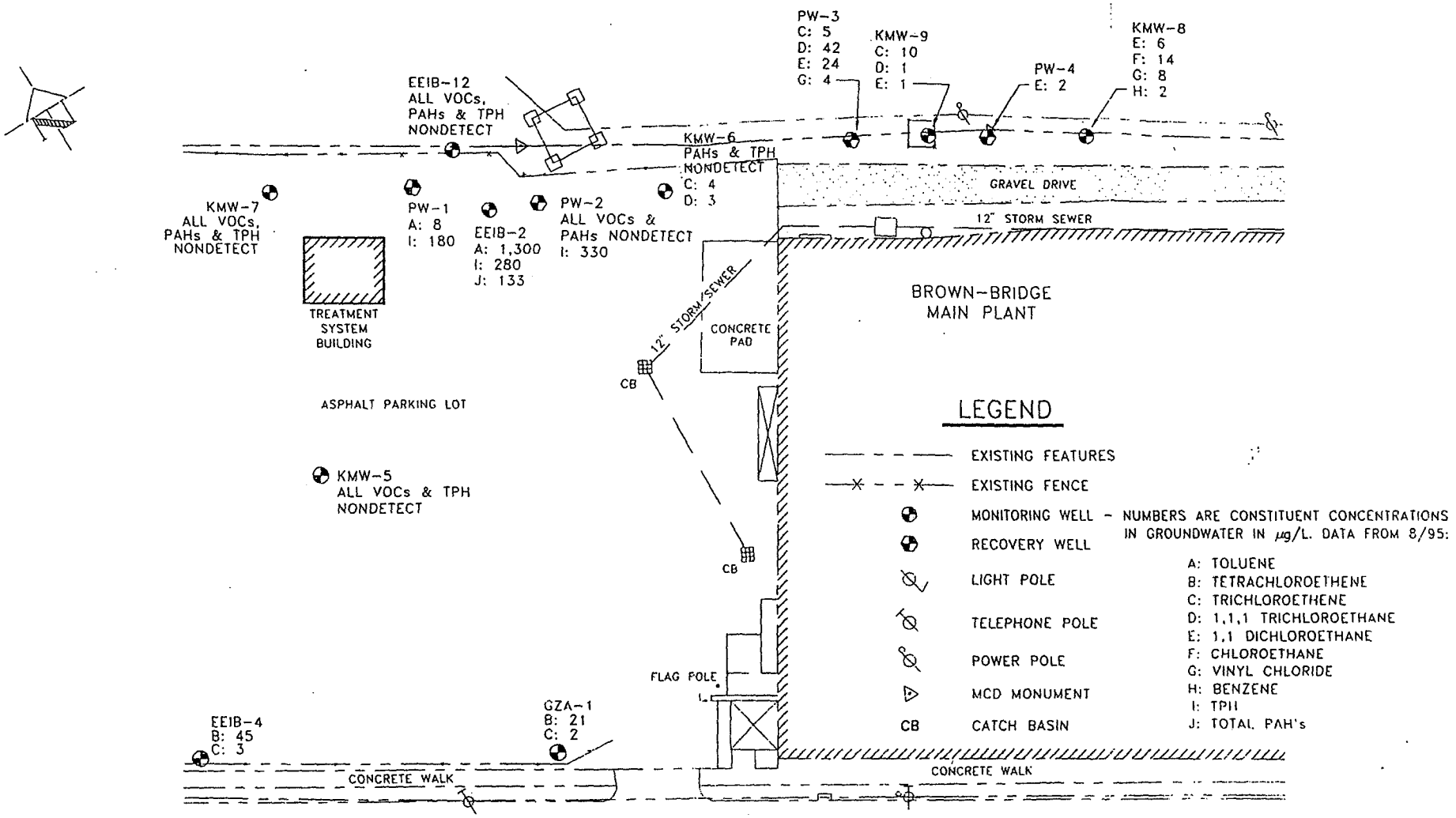


FIGURE 1

SCALE 1" = 30'	NO.	DATE	REVISION DESCRIPTION
DWN. BY SKN			
CHK'D. BY SSM			
APPR. BY SSM			

Applied Engineering & Science — Atlanta Georgia

GROUNDWATER CONTAMINANT CONCENTRATIONS
WEST END - AUGUST, 1995
KIMBERLY-CLARK CORPORATION
TROY, OHIO

DATE NOV., 1995
DWG. NO. 3326D-02
SHEET NO. 2 OF 4

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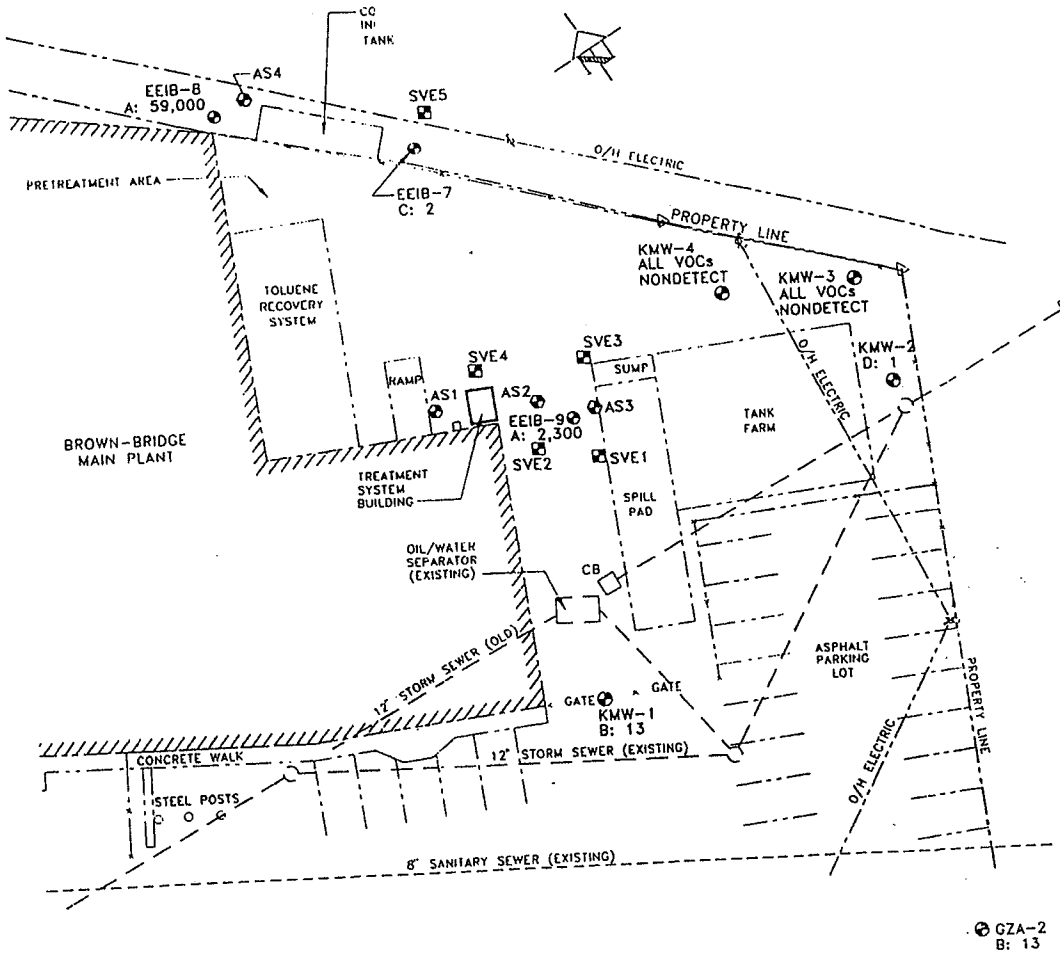


LEGEND

- EXISTING FEATURES
- EXISTING FENCE
- STORM SEWER
- SANITARY SEWER
- AIR INJECTION WELL
- VAPOR EXTRACTION WELL
- MONITORING WELL – NUMBERS ARE CONSTITUENT CONCENTRATIONS IN GROUNDWATER IN µg/L. DATA FROM 8/95:
  - A: TOLUENE
  - B: TETRACHLOROETHENE
  - C: TRICHLOROETHENE
  - D: 1,1 DICHLOROETHANE
- LIGHT POLE
- POWER POLE
- MCD MONUMENT

FIGURE 2

SCALE 1" = 30'	NO.	DATE	REVISION DESCRIPTION
DWN. BY GOE			
CHK'D. BY SSM			
APPR. BY SSM			

Applied Engineering & Science — Atlanta Georgia

GROUNDWATER CONTAMINANT CONCENTRATIONS
EAST END – AUGUST, 1995
KIMBERLY-CLARK CORPORATION
TROY, OHIO

DATE NOV., 1995
DWG. NO. 3326D-03
SHEET NO. 3 OF 4

I:\DWG\3326\EBASPOT.DWG

WELL FIELD MAP

TDH HAS ORIGINAL

OHIO E.P.A.
MAR 13 2001
ENTERED DIRECTOR'S JOURNAL

BEFORE THE

OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:	:	
	:	
Kimberly-Clark Corporation	:	**Director's Final**
1400 Holcomb Bridge Road	:	**Findings and Orders**
Roswell, Georgia 30076-2199	:	

I. JURISDICTION

1. These Director's Final Findings and Orders ("Orders") are issued pursuant to the authority vested in the Director of the Ohio EPA under Sections 3734.13, 3734.20, 6111.03, and 3745.01 of the Ohio Revised Code.

II. PARTIES BOUND

2. These Orders shall apply to and be binding upon Kimberly-Clark Corporation ("Kimberly-Clark"), its agents, successors, and assigns.

3. No change in ownership or corporate status of Kimberly-Clark including, but not limited to, any transfer of assets or real or personal property shall in any way alter Kimberly-Clark's obligations under these Orders.

4. Kimberly-Clark shall provide a copy of these Orders to all contractors, subcontractors, laboratories and consultants retained to perform any portion of the Work performed pursuant to these Orders. Kimberly-Clark shall ensure that all contractors, subcontractors, laboratories and consultants retained to perform Work pursuant to these Orders comply with the provisions of these Orders.

III. DEFINITIONS

5. Unless otherwise expressly provided herein, terms used in these Orders or in any appendices shall have the same meaning as used in Chapters 3734 and 6111 of the Ohio Revised Code. Whenever the terms listed below are used in these Orders or in any appendices, attached hereto and incorporated herein, the following definitions shall apply:

I certify this to be a true and correct copy of the official document filed in the records of the Ohio Environmental Protection Agency
By [illegible] Date 3/13/01

a. "Day" shall mean a calendar day unless expressly stated to be a business day. "Business day" shall mean a day other than a Saturday, Sunday, or State Holiday. In computing any period of time under these Orders, where the last day would fall on a Saturday, Sunday, or State Holiday, the period shall run until the close of the next business day.

b. "NCP" shall mean the National Oil and Hazardous Substances Pollution Contingency Plan, codified at 40 C.F.R. Part 300 (1990), as amended.

c. "Ohio EPA" shall mean the Ohio Environmental Protection Agency and its designated representatives.

d. "Paragraph" shall mean a portion of these Orders identified by an Arabic numeral or an upper or lower case letter.

e. "Parties" shall mean Kimberly-Clark and the Ohio EPA.

f. "Risk Assessment Guidance for Superfund" ("RAGS") shall mean RAGS: Volume 1 - Human Health Evaluation Manual, Part B, Development of Risk-based Preliminary Remediation Goals, OSWER Directive 9285.7-01B, December, 1991, Interim attached hereto and incorporated herein as Attachment B of these Orders.

g. "Section" shall mean a portion of these Orders identified by a roman numeral.

h. "Site" shall mean the property located at 518 East Water Street, Troy, Miami County, Ohio, commonly referred to as "Brown-Bridge Plant 1," where the treatment, storage, and/or disposal of hazardous waste, and/or the discharge into waters of the state of industrial waste or other waste has occurred, including any other area where such hazardous wastes, industrial wastes, and/or other wastes have migrated or threaten to migrate.

i. "Waste Material" shall mean (1) any "hazardous waste" under Section 3734.01(J) of the Ohio Revised Code; (2) any "solid waste" under Section 3734.01(E) of the Ohio Revised Code; (3) any "industrial waste" under Section 6111.01(C) of the Ohio Revised Code; and (4) any "other waste" under Section 6111.01(D) of the Ohio Revised Code.

j. "Work" shall mean all activities Kimberly-Clark is required to perform under these Orders.

IV. FINDINGS OF FACT, DETERMINATIONS, AND CONCLUSIONS OF LAW

6. All findings of fact, determinations, and conclusions of law necessary for the issuance of these Orders pursuant to Sections 3734.13, 3734.20, 3745.01 and 6111.03 of the Ohio Revised Code have been made and are outlined below. Ohio EPA has determined the following:

a. Kimberly-Clark acquired the property located at 518 East Water Street in Troy, Miami County, Ohio (the "Site") as a result of a merger with Brown-Bridge Mills, Inc. on December 31, 1977. The Site consists of approximately 5 acres of land adjacent to the flood plain of the Great Miami River. Prior to September, 1994, the Site was used for the manufacture of pressure, moisture, and heat sensitive stock for labels, stamps, and related items.

b. Brown-Bridge Industries acquired the Site from Kimberly-Clark on September 16, 1994. In 1998, Brown-Bridge Industries changed its name to Spinnaker Coating, Inc. ("Spinnaker"). Spinnaker continues to utilize this facility for the manufacture of pressure, moisture, and heat sensitive stock for labels, stamps, and related items.

c. Toluene, as product, was stored in bulk tanks at the bulk storage area at the west end of the Site. The Site formerly contained a toluene recovery system at the west end which included a 3000 gallon flow through process tank. The flow through process tank was removed in 1988.

d. There are known to have been at least four instances of releases at the Site, including the following:

i. According to Kimberly-Clark, during due diligence interviews associated with the sale of the Site to Brown-Bridge, it was discovered that in 1986 or 1987, approximately 15 to 25 gallons of toluene overflowed from a virgin toluene tank at the bulk chemical storage tank location on the Site's west end.

ii. According to Kimberly-Clark, in July, 1988, above-ground piping to a toluene storage tank was found to be leaking during a regularly scheduled tank-tightness test. The quantity discharged during this release has not been determined.

iii. According to an initial pollution incident report prepared by Ohio EPA, an

estimated 4000 pounds of toluene leaked into the atmosphere over several days prior to its discovery on April 12, 1989. The leak apparently was due to a malfunctioning steam valve at the toluene recovery system.

iv. According to an initial pollution incident report prepared by Ohio EPA, an estimated 500 gallons of toluene leaked from the toluene recovery system to the ground underneath the system on January 25, 1994.

e. Analysis of ground-water samples from the Site conducted by Kimberly-Clark in October, 1993 and July, 1994 showed the presence of the following compounds at levels presented below:

Chemical	Concentration (μg/l)
Toluene	320,000
Benzene	62
1,1,1-Trichloroethane	270
Tetrachloroethene	28
Trichloroethene	400
Vinyl Chloride	170
Cis-1,2-dichloroethene	230

f. Contaminated ground water at the Site is located approximately 900 feet upgradient from a City of Troy production well. According to the City's well head protection program, the Site is located within the one-year capture zone of the City's well field.

g. Kimberly-Clark's consultant, Applied Engineering & Science, Inc. (AES), in a report dated August, 1994, determined that ground-water contamination is migrating downgradient in a northeasterly direction off the Site onto adjacent property.

h. Two areas of soil and ground water contamination, on the east and west portions of the property, were identified by AES.

i. In April 1995, approximately 1525 cubic yards of contaminated soils were excavated and removed from the bulk storage and nonhazardous waste storage areas of the Site. Soil samples collected from these areas contained trichloroethene at concentrations up to 29,000 μg/kg, 1,1,1-trichloroethane at concentrations up to 1400 μg/kg, and tetrachloroethene at concentrations up to 790 μg/kg.

j. The material excavated from the bulk storage area was placed in roll-off containers. One container was manifested as hazardous waste due to its trichloroethene content.

k. In the summer of 1995, a ground water treatment system was installed on the west end of the property and an air sparging/vapor extraction system was installed on the east end. Both systems began operation on September 6, 1995.

l. In February 1997, Kimberly-Clark and Brown-Bridge determined that, according to ground water monitoring, their cleanup goals had been reached for the east end. The air sparging stopped in March 1997, while vapor extraction continued until January 1998.

m. The West End pump-and-treat system consists of four pumping wells and an air stripper to treat the water. The treated water was discharged to the Great Miami River under a NPDES discharge permit.

n. Ohio EPA invited Kimberly-Clark to negotiate an administrative order for the performance of a Remedial Investigation and Feasibility Study ("RI/FS") in 1997. At that time, Kimberly-Clark declined to enter into the administrative order stating that "continuation of the voluntary cleanup appears to be the most cost effective way to insure completion of the Site cleanup." Ohio EPA decided to change the scope of work from an RI/FS to operation and maintenance of the West End pump and treat system, with a provision for periodic evaluation of the effectiveness of the system. Kimberly-Clark declined to enter into an order that included the evaluation of effectiveness provision.

o. In a letter dated February 14, 2001, Kimberly-Clark stated that it had "completed the soil and ground water remediation project at Spinnaker Coating Facility ..." and that it planned to shut down the system on March 1, 2001. In response to this letter, Ohio EPA sent correspondence to Kimberly-Clark on February 27, 2001 asking that the system not be shut down because of concerns that the City of Troy's public water supply wells could be jeopardized. Ohio EPA suggested that a meeting take place before any action was taken and asked for possible dates to meet. On March 1, 2001, Kimberly-Clark proceeded to shut down the pump and treat system without waiting to meet with Ohio EPA to hear Ohio EPA's concerns.

p. Kimberly-Clark collected ground-water samples on a quarterly basis from the pumping wells and monitoring wells at the Site. The analytical results for vinyl chloride from pumping wells 3 and 4 and vinyl chloride and trichloroethene from pumping well 3 and monitoring well KMW-9 for the years 1999 and 2000 follow. The results show that the concentrations of vinyl chloride and trichloroethene exceed Federal and state drinking water maximum contaminant levels (MCLs). Pumping wells 3 and 4 and monitoring well KMW-9 lie between the bulk storage area and Troy's east well field.

Vinyl Chloride

Well	3/15/99	6/16/99	9/2/99	12/16/99	3/1/00	6/6/00	9/7/00	12/13/00
PW-3	6	7	13	n	**2.0**	6.7	9.2	8.0
PW-4	n	3	1	1.1	n	n	n	3.7

Trichloroethene

Well	3/15/99	6/16/99	9/2/99	12/16/99	3/1/00	6/6/00	9/7/00	12/13/00
PW-3	3	9	3	1.1	2.1	3.4	12	9.5
KMW-9	1	12	n	7.8	2.6	n	16	7.4

Notes:
All values are in $\mu g/l$.
n - not detected
Boldface denotes values greater than federal and state drinking water MCLs.
The MCL for vinyl chloride is 2.0 $\mu g/l$.
The MCL for trichloroethene is 5.0$\mu g/l$.

q. On May 23, 24 and 25, 2000, Ohio EPA collected ground-water samples from borings RS02, RS03, RS04, and RS06 along the northeast side of the Spinnaker building between the facility and Troy's east well field. Trichloroethene was detected in boring RS02 at 72 $\mu g/l$, in boring RS03 at 70 $\mu g/l$, in boring RS04 at 5 $\mu g/l$, and in boring RS06 at 9.6 $\mu g/l$. Vinyl chloride was detected in boring RS04 at 3.5 $\mu g/l$ and in boring RS06 at 2.8 $\mu g/l$.

r. Trichloroethene and tetrachloroethene in soil and ground water will degrade to form cis-1,2-dichloroethene. Analysis performed during the excavation and removal of soils from the Site did not include cis-1,2-dichloroethene, which has been detected in Site wells. Generally, wells downgradient from the bulk storage and nonhazardous waste storage areas have shown higher concentrations of cis-1,2-dichloroethene than upgradient

wells.

s. The City of Troy analyzes its well water for volatile organic compounds periodically (generally, once per quarter). Cis-1,2-dichloroethene has been detected in Troy's east well field since 1988. Trichloroethene was detected in the east well field in 1990.

t. Ohio EPA conducted a pump test of the aquifer beneath the Site in November, 2000. The pump test demonstrated that shallow ground water beneath the Site is hydraulically connected to Troy's east well field, that contaminants in ground water at the Site will migrate to the east well field, and that the Great Miami River does not form a hydraulic barrier preventing the migration of contaminants from the site to the east well field.

u. Without the operation of the ground-water pump and treat system, increased concentrations of trichloroethene, cis-1,2-dichloroethene, and vinyl chloride will migrate to Troy's east well field.

v. Kimberly-Clark is a "person" as defined under Section 3734.01(G) of the Ohio Revised Code.

w. Because of their quantity, concentration, or physical or chemical characteristics, the Director has determined that toluene, benzene, 1,1,1-trichloroethane, tetrachloroethene, trichloroethene, vinyl chloride, cis-1,2-dichloroethene and other contaminants found at the Site are "hazardous wastes" as defined under Section 3734.01(J) of the Ohio Revised Code.

x. The Site is a hazardous waste facility, solid waste facility, or other location where hazardous waste was treated, stored, or disposed.

y. Conditions at the Site constitute a substantial threat to public health or safety or are causing or contributing or threatening to cause or contribute to air or water pollution or soil contamination.

z. Kimberly-Clark is a "person" as defined under Section 6111.01(I) of the Ohio Revised Code.

aa. The toluene, benzene, 1,1,1-trichloroethane, tetrachloroethene, trichloroethene, vinyl chloride, cis-1,2-dichloroethene, and other contaminants found at the Site are "industrial wastes" or "other wastes" as defined under Section 6111.01 of the Ohio

Revised Code.

bb. The ground water and surface water at the Site are "waters of the state" as defined under Section 6111.01(H) of the Ohio Revised Code.

cc. The Work required by these Orders will contribute to the prohibition or abatement of the discharge of industrial wastes or other wastes into the waters of the state.

dd. In issuing these Orders, the Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and their relation to benefits to the people of the state to be derived from such compliance.

ee. Based upon information available to the Director as set forth in these Findings of Fact, the Director has determined that the work required by these Orders, set forth below, is in the nature of interim measures only, designed to contain, abate, mitigate and control contamination. The Director has given consideration to the evidence related to documented activities which have occurred and/or will occur at the Site. Based upon the facts presented, the Director believes that issuance of these Orders is furthering the intent of the General Assembly, that Ohio EPA will prevent, control or abate pollution of the environment for the protection and preservation of the health, safety, welfare and property of the people of the State.

V. GENERAL PROVISIONS

7. Objectives of the Orders

The objective of the Ohio EPA in issuing these Orders is to contribute to the protection of public health, safety, and welfare and the environment from the disposal, discharge, or release of Waste Material at the Site through the continued implementation and monitoring of the West End ground water pump and treatment system by Kimberly-Clark. Kimberly-Clark shall perform the Work in accordance with these Orders, including but not limited to, relevant guidance documents, and all standards, specifications, and schedules set forth in or developed pursuant to these Orders.

8. Compliance With Law

a. All activities undertaken by Kimberly-Clark pursuant to these Orders shall be performed in accordance with the requirements of all applicable federal and state laws

and regulations.

b. Kimberly-Clark shall perform the activities required pursuant to these Orders in a manner which is not inconsistent with the NCP.

c. Where any portion of the Work requires a permit or approval, Kimberly-Clark shall timely submit applications and take all other actions necessary to obtain such permits or approval. These Orders are not, and shall not be construed to be, a permit issued pursuant to any statute or regulation.

VI. PERFORMANCE OF THE WORK

9. Within five (5) days of the issuance of these Orders, Kimberly-Clark shall resume operation of the existing West End ground-water pump and treatment system described in the Site Remediation Report, found in Attachment A, until such time as the interim action ground-water compliance (IAGWC) standards described in Section VI., Paragraph 16 (a-d) of these Orders, are met and confirmed by the Ohio EPA. Kimberly-Clark shall maintain the West End ground water pump and treat system during its operation.

10. Kimberly-Clark shall evaluate the effectiveness of the West End ground-water pump and treatment system in preventing further migration of contamination from sources at the Site in accordance with the following provisions:

a. Within 45 days of the issuance of these Orders, Kimberly-Clark shall submit a work plan for evaluating the effectiveness of the West End ground-water pump and treatment system in preventing further migration of contamination from sources at the Site. The evaluation shall include the measurement of aquifer properties at the Site including vertical and horizontal hydraulic conductivity, specific yield, and gradient. The evaluation shall estimate the capture zone of the pumping wells using both empirical data collected from the Site and mathematical modeling. All models used to estimate the capture zones of the pumping wells shall be calibrated and verified. Scale drawings showing the estimated vertical and horizontal extent of the capture zones for the pumping wells shall be prepared. The work plan shall include a fixed-date schedule for conducting the evaluation and submitting a final report on the evaluation to Ohio EPA.

b. The work plan and final report shall be subject to the review, approval, or disapproval of Ohio EPA, in accordance with the provisions set

forth in Section XI of these Orders.

c. Upon Ohio EPA's approval of the work plan, Kimberly-Clark shall implement the Work detailed therein in accordance with the schedule contained in the approved work plan.

11. Kimberly-Clark shall collect and analyze ground-water samples from all operating pumping wells on a quarterly basis.

12. Kimberly-Clark shall collect and analyze ground-water samples from the following Site wells on a quarterly basis: PW-1, PW-2, PW-3, PW-4, KMW-5, KMW-6, KMW-7, KMW-8, KMW-9, EEIB-2, EEIB-4, EEIB-12, GZA-1, RS04, and RS06.

13. Kimberly-Clark shall continue to collect water level measurements from the following Site wells on a quarterly basis: PW-1, PW-2, PW-3, PW-4, KMW-1, KMW-2, KMW-3, KMW-4, KMW-5, KMW-6, KMW-7, KMW-8, KMW-9, EEIB-2, EEIB-4, EEIB-7, EEIB-8, EEIB-9, EEIB-11, EEIB-12, GZA-1, GZA-2, RS04, and RS06.

14. Ground water samples shall be analyzed by EPA Method SW846-8260, with low detection limits (25 ml purge).

15. Ohio EPA may modify any portion of the ground-water monitoring program. Ohio EPA shall notify Kimberly-Clark in writing if any such modifications are determined to be warranted.

16. **IAGWC** standards shall be determined according to the following procedure:

a. The Site contaminants of concern (**"COC"**) are trichloroethene and vinyl chloride.

b. For each COC, identify the corresponding maximum contaminant level (**"MCL"**) and calculate the residential water carcinogenic effects remediation goal (10^{-5}) and the residential water non-carcinogenic effects remediation goal (HI=1) using equations 1' and 2' on pages 21 and 22 of the Risk Assessment Guidance for Superfund, Part B, found in Attachment B of these Orders. When using equation 1', substitute a target excess individual lifetime cancer risk value of 10^{-5} into the equation.

c. For each COC, select the lowest concentration from among the MCL,

the carcinogenic risk-based remediation goal, and the non-carcinogenic risk-based remediation goal.

d. The value obtained in item "c" above becomes the IAGWC standard unless the value is less than 1.0 part per billion in which case 1.0 part per billion becomes the IAGWC standard.

17. Kimberly-Clark may petition the Ohio EPA to cease operation of the West End ground-water pump and treatment system should ground-water sampling and analysis indicate that the concentrations of each COC are less than the IAGWC standards for four consecutive quarters in the following wells: PW-1, PW-2, PW-3, PW-4, KMW-6, KMW-7, KMW-8, KMW-9, EEIB-2, EEIB-12, RS04, and RS06. Kimberly-Clark shall resample the ground-water approximately one week following receipt of the fourth consecutive quarter's sampling results to confirm whether the concentrations of each COC are less than the IAGWC standards. Following receipt of written concurrence from the Ohio EPA that the concentrations of each COC are less than the IAGWC standards, Kimberly-Clark may cease operation of the West End ground-water pump and treatment system.

18. Following the Ohio EPA-approved cessation of operation of the West End ground-water pump and treatment system, Kimberly-Clark shall continue to maintain the treatment system in such a manner as to allow for the resumed operation of the treatment system, if resumed operation of the system is required by Ohio EPA due to any exceedance of the IAGWC standards.

19. Following Ohio EPA-approved cessation of operation of the West End ground-water pump and treatment system, Kimberly-Clark shall continue ground-water analytical sampling on a quarterly basis for Site wells listed in Section VI., Paragraphs 12 and 13 of these Orders. If Kimberly-Clark's sampling results indicate that IAGWC standards have been exceeded during any sampling event, Kimberly-Clark shall resample the ground water approximately one week following receipt of the initial sampling results to confirm whether IAGWC standards have been exceeded. If the resampling results confirm that the IAGWC standards have been exceeded, Kimberly-Clark shall resume operation of the West End ground-water pump and treatment system, including the resumption of quarterly water level measurements, and continue quarterly ground-water analytical sampling. Kimberly-Clark shall notify Ohio EPA within twenty-four (24) hours of the resumption of operation of the treatment system if the sampling and resampling, as described above, show that the IAGWC standards have been exceeded.

20. These Orders shall not be eligible for termination pursuant to Section XVI, Termination, until eight (8) consecutive quarters of ground-water sampling and analysis

have demonstrated continued compliance with the IAGWC standards.

VII. SAMPLING AND DATA AVAILABILITY

21. Kimberly-Clark shall notify Ohio EPA not less than fifteen (15) days in advance of all sample collection activity. Kimberly-Clark shall allow split and/or duplicate samples to be taken by Ohio EPA. Ohio EPA shall also have the right to take any additional samples it deems necessary.

22. Within seven (7) days of a request by Ohio EPA, Kimberly-Clark shall submit to Ohio EPA copies of the results of all sampling and/or tests or other data, including raw data and original laboratory reports, generated by or on behalf of Kimberly-Clark with respect to the Site and/or the implementation of these Orders. Kimberly-Clark may submit to Ohio EPA any interpretive reports and written explanations concerning the raw data and original laboratory reports. Such interpretive reports and written explanations shall not be submitted in lieu of original laboratory reports and raw data. Should Kimberly-Clark subsequently discover an error in any report or raw data, Kimberly-Clark shall promptly notify Ohio EPA of such discovery and provide the correct information within seven (7) days.

VIII. ACCESS

23. Ohio EPA shall have access at all times to the Site and any other property to which access is required for the implementation of these Orders, to the extent access to the property is controlled by Kimberly-Clark. Access under these Orders shall be for the purposes of conducting any activity related to these Orders including, but not limited to the following:

a. monitoring the Work;

b. conducting sampling;

c. inspecting and copying records, operating logs, contracts, and/or other documents related to the implementation of these Orders;

d. conducting investigations and tests related to the implementation of these Orders; and

e. verifying any data and/or other information submitted to Ohio EPA.

24. To the extent that the Site or any other property to which access is required for the implementation of these Orders is owned or controlled by persons other than Kimberly-Clark, Kimberly-Clark shall use its best efforts to secure from such persons access for Kimberly-Clark and Ohio EPA as necessary to effectuate these Orders. Copies of all access agreements obtained by Kimberly-Clark shall be provided promptly to Ohio EPA. If any access required to effectuate these Orders is not obtained within thirty (30) days of the effective date of these Orders, or within thirty (30) days of the date Ohio EPA notifies Kimberly-Clark in writing that additional access beyond that previously secured is necessary, Kimberly-Clark shall promptly notify the Ohio EPA in writing of the steps Kimberly-Clark has taken to attempt to obtain access.

25. Notwithstanding any provision of these Orders, the State of Ohio retains all of its access rights and authorities, including enforcement authorities related thereto, under any applicable statute or regulations.

IX. DESIGNATED SITE COORDINATORS

26. Within five (5) days of the effective date of these Orders, Kimberly-Clark shall notify Ohio EPA, in writing, of the name, address and telephone number of its designated Site Coordinator and Alternate Site Coordinator. If a designated Site Coordinator or Alternate Site Coordinator is changed, the identity of the successor shall be given to the other Party at least five (5) days before the changes occur, unless impracticable; but in no event later than the actual day the change is made.

27. To the maximum extent practicable, except as specifically provided in these Orders, communications between Kimberly-Clark and Ohio EPA concerning the implementation of these Orders shall be made between the Site Coordinators. Kimberly-Clark's Site Coordinator shall be available for communication with Ohio EPA regarding the implementation of these Orders for the duration of these Orders. Each Site Coordinator shall be responsible for assuring that all communications from the other Party are appropriately disseminated and processed. Kimberly-Clark's Site Coordinator or alternate shall be present on the Site or on call during all hours of Work at the Site.

28. Without limitation of any authority conferred on Ohio EPA by statute or regulation, Ohio EPA Site Coordinator's authority includes, but is not limited to the following:

a. taking samples and directing the type, quantity and location of samples to be taken by Kimberly-Clark pursuant to an approved work plan;

b. observing, taking photographs, or otherwise recording information related to the implementation of these Orders, including the use of any mechanical or photographic device;

c. directing that the Work stop whenever the Site Coordinator for Ohio EPA determines that the activities at the Site may create or exacerbate a threat to public health or safety, or threaten to cause or contribute to air or water pollution or soil contamination;

d. conducting investigations and tests related to the implementation of these Orders;

e. inspecting and copying records, operating logs, contracts and/or other documents related to the implementation of these Orders; and

f. assessing Kimberly-Clark's compliance with these Orders.

X. PROGRESS REPORTS AND NOTICE

29. Unless otherwise directed by Ohio EPA, Kimberly-Clark shall provide quarterly progress reports to the Ohio EPA concerning the work carried out by Kimberly-Clark during the previous quarter. The quarters shall be divided into the following reporting periods: the First Quarter shall be months January through March; the Second Quarter shall be months April through June; the Third Quarter shall be months July through September; and the Fourth Quarter shall be months October through December. The quarterly progress reports shall be submitted by the tenth (10) day of the first month following the reporting period. The quarterly progress reports shall include, at a minimum, the following information:

a. a description of the status of the Work and progress to date;

b. summaries of all changes made in the interim measures during the reporting period;

c. summaries of all contacts with representatives of the City of Troy, local community, public interest groups, county and state agencies, and government during the reporting period concerning the Work being done as a result of these Orders;

d. summaries of all relevant findings including, but not limited to, water level measurements, flow maps, etc., from Site wells listed in Section VI., Paragraph 13 of these

Orders;

e. summaries of all relevant findings including, but not limited to, analytical sampling results, etc., from Site wells listed in Section VI., Paragraphs 11 and 12 of these Orders;

f. an accounting of how much contaminated ground water was pumped during the reporting period;

g. a description of the difficulties encountered during the reporting period;

h. a description of the actions taken to rectify any difficulties encountered;

i. a description of activities planned for the next quarter; and

j. an identification of changes in key project personnel.

30. Progress reports and all other documents required to be submitted pursuant to these Orders shall be sent by certified mail return receipt requested, or equivalent, to the following address, or to such other address as directed by Ohio EPA:

Ohio Environmental Protection Agency
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049
ATTN: DERR Records Room

Ohio EPA
Southwest District Office
401 East Fifth Street
Dayton, Ohio 45402
ATTN: Brown Bridge Site Coordinator, DERR

XI. REVIEW OF SUBMITTALS

31. Ohio EPA will review any work plan, report, or other item required to be submitted pursuant to these Orders. Upon review, Ohio EPA may in its sole discretion: (a) approve the submission in whole or in part; (b) approve the submission upon specified conditions; (c) modify the submission; (d) disapprove the submission in whole or in part, notifying Kimberly-Clark of deficiencies; or (e) any combination of the above.

32. In the event of Ohio EPA's approval, approval upon condition, or modification of any submission, Kimberly-Clark shall proceed to take any action required by the submission as approved, conditionally approved, or modified by Ohio EPA.

33. In the event that Ohio EPA initially disapproves a submission, in whole or in part, and notifies Kimberly-Clark of the deficiencies, Kimberly-Clark shall, within fourteen (14) days, or such longer period of time as specified by Ohio EPA in writing, correct the deficiencies and resubmit to Ohio EPA for approval a revised submission. The revised submission shall incorporate all of the changes, additions, and/or deletions specified by Ohio EPA in its notice of deficiency. Notwithstanding the notice of deficiency, Kimberly-Clark shall proceed to take any action required by a non-deficient portion of the submission.

34. In the event that Ohio EPA disapproves a revised submission, in whole or in part, Ohio EPA may require Kimberly-Clark to correct the deficiencies and incorporate all changes, additions, and/or deletions within fourteen (14) days, or such period of time as specified by Ohio EPA in writing. Or, in the alternative, Ohio EPA retains the right to terminate these Orders, perform any additional remediation, conduct further investigation, and/or enforce the terms of these Orders.

35. All work plans, reports, or other items required to be submitted to Ohio EPA under these Orders shall, upon approval by Ohio EPA, be deemed to be incorporated in and made an enforceable part of these Orders. In the event that Ohio EPA approves a portion of a work plan, report, or other item, the approved portion shall be deemed to be incorporated in and made an enforceable part of these Orders.

XII. RESERVATION OF RIGHTS

36. Ohio EPA reserves the right to seek legal and/or equitable relief to enforce the terms and conditions of these Orders, including penalties against Kimberly-Clark for noncompliance with these Orders.

37. Ohio EPA reserves the right to terminate these Orders and/or perform all or any portion of the Work or any other measures, including but not limited to conducting further investigation and/or remediation, in the event that the requirements of these Orders are not wholly complied with within the time frames required by these Orders.

38. Ohio EPA reserves the right to take any action, including but not limited to any enforcement action, action to recover costs, or action to recover damages to natural

resources, pursuant to any available legal authority as a result of past, present, or future violations of state or federal laws or regulations or the common law, and/or as a result of events or conditions arising from, or related to, the Site. Upon termination of these Orders pursuant to Section XVI, Termination, Kimberly-Clark shall have resolved its liability to Ohio EPA only for the Work performed pursuant to these Orders.

XIII. ACCESS TO INFORMATION

39. Kimberly-Clark shall provide to Ohio EPA, upon request, copies of all documents and information within its possession or control or that of its contractors or agents relating to events or conditions at the Site including, but not limited to manifests, reports, correspondence, or other documents or information related to the Work.

40. Kimberly-Clark may assert a claim that documents or other information submitted to the Ohio EPA pursuant to these Orders is confidential under the provisions of Rule 3745-50-30(A) of the Ohio Administrative code or Section 6111.05(A) of the Ohio Revised Code. If no such claim of confidentiality accompanies the documents or other information when it is submitted to Ohio EPA, it may be made available to the public without notice to Kimberly-Clark.

41. Kimberly-Clark may assert that certain documents or other information are privileged under the attorney-client or any other privilege recognized by state law. If Kimberly-Clark makes such an assertion, it shall provide Ohio EPA with the following: (1) the title of the document or information; (2) the date of the document or information; (3) the name and title of the author of the document or information; (4) the name and title of each addressee and recipient; (5) a general description of the contents of the document or information; and (6) the privilege being asserted by Kimberly-Clark.

42. No claim of confidentiality shall be made with respect to any data, including but not limited to, all sampling, analytical monitoring, or laboratory or interpretive reports.

43. Kimberly-Clark shall preserve for the duration of these Orders and for a minimum of ten (10) years after its termination, all documents and other information within its possession or control, or within the possession or control of its contractors or agents, which in any way relate to the Work, notwithstanding any document retention policy to the contrary. Kimberly-Clark may preserve such documents by microfiche, or other electronic or photographic device. At the conclusion of this document retention period, Kimberly-Clark shall notify Ohio EPA at least sixty (60) days prior to the destruction of these documents or other information; and upon request, shall deliver such documents and other

Information to Ohio EPA.

XIV. OTHER CLAIMS

44. Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action, or demand in law or equity against any person, firm, partnership, or corporation, not subject to these Orders for any liability arising from, or related to, events or conditions at the Site.

XV. EFFECTIVE DATE AND SUBSEQUENT MODIFICATION

45. The effective date of these Orders shall be the date on which these Orders are entered in the Journal of the Director of Ohio EPA.

46. These Orders may be modified by Ohio EPA. Modifications shall be in writing and shall be effective on the date entered in the Journal of the Director of Ohio EPA.

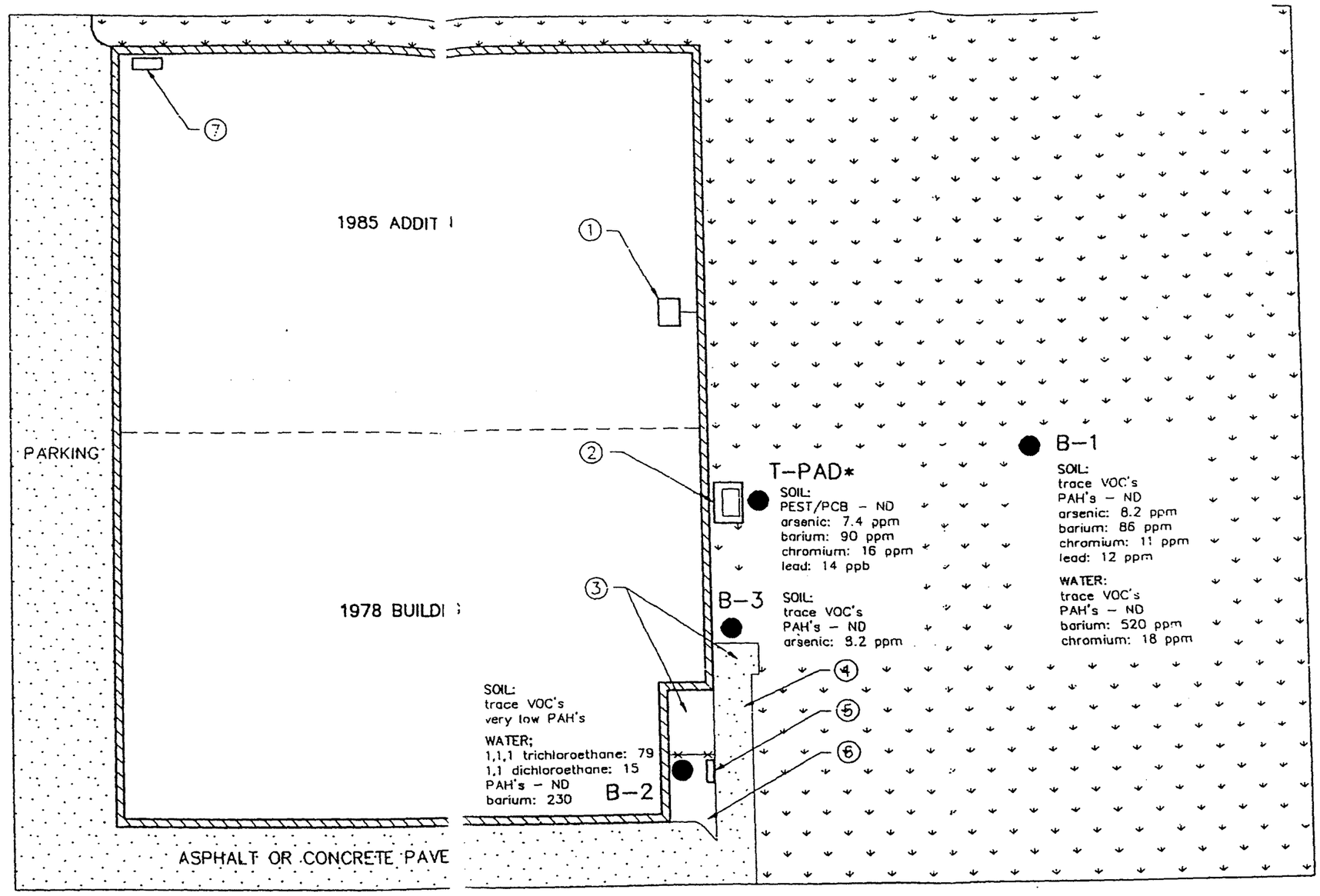
XVI. TERMINATION

47. These Orders shall terminate upon Ohio EPA's approval in writing of Kimberly-Clark's written certification to Ohio EPA that all Work required to be performed under these Orders has been completed. The termination of these Orders shall not affect the terms and conditions of Section XII, Reservation of Rights, Section XIII, Access to Information, and Section XIV, Other Claims.

IT IS SO ORDERED:

Christopher Jones, Director
Ohio Environmental Protection Agency

3-12-01
Date



1. AIR COMPRESSOR DISCHARGE
2. TRANSFORMER PAD
3. DRUM STORAGE AREAS
4. SPILL COLLECTION TANK (8,000 gal)
5. BULK UNLOADING STATION
6. FORMER FUEL OIL USTs (2)
7. OIL/WATER SEPARATOR FOR FORKLIFT WASHING

DISCLAIMER:
THIS DRAWING WAS REPRODUCED FROM INFORMATION OBTAINED FROM A GZA GEOENVIRONMENTAL DRAWING.

• - REPRESENTS SURFACE GRAB SAMPLE

NOTE:
ALL CONCENTRATIONS ARE IN ppb UNLESS OTHERWISE NOTED.

FIGURE 7

SCALE NOT TO SCALE	NO.	DATE	REVISION	DESCRIPTION
DWN. BY BAA				
CHK'D. BY KMK				
APPR. BY SM				

Applied Engineering & Science

Atlanta Georgia

CONTAMINANT CONCENTRATIONS
KIMBERLY-CLARK CORPORATION
BROWN-BRIDGE PLANT 2, TROY, OHIO

DATE NOV. 19, 199.
DWG. NO. 3326A106
SHEET NO. 7

Appendix E
Sanborn Maps, Historical Topographic Maps and City Directories for Plant No. 1

Environmental Data Resources, Inc.

"Linking Technology with Tradition"

Sanborn® Map Report

Ship to: Leigh Anne Sievert
ERM, Inc.
355 East Campus View
Columbus, OH 43235

1181019SXM 614-433-7900

Order Date: 1/30/2002 **Completion Date:** 01/31/2002
Inquiry #: 729028.4S
P.O. #: hr501.00.01
Site Name: Spinnaker Coating
Address: 518 E. Water Street
City/State: Troy, OH 45373
Cross Streets:

Based on client-supplied information, fire insurance maps for the following years were identified

1887 - 1 - map
1892 - 1 - map
1898 - 2 - maps
1905 - 2 - maps
1911 - 1 - map
1923 - 1 - map
1931 - 1 - map
1947 - 1 - map
1955 - 1 - map

Total Maps: 11

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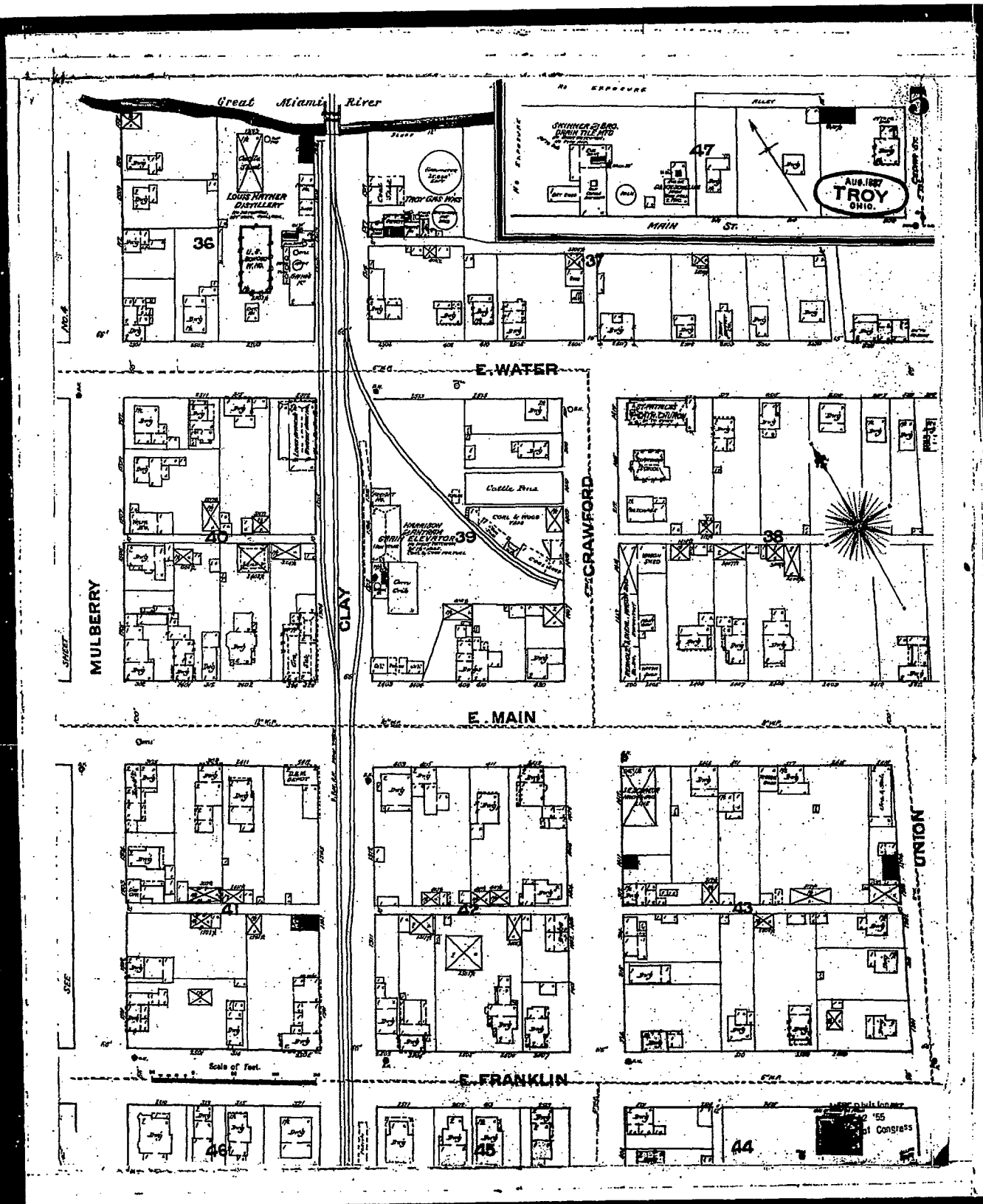

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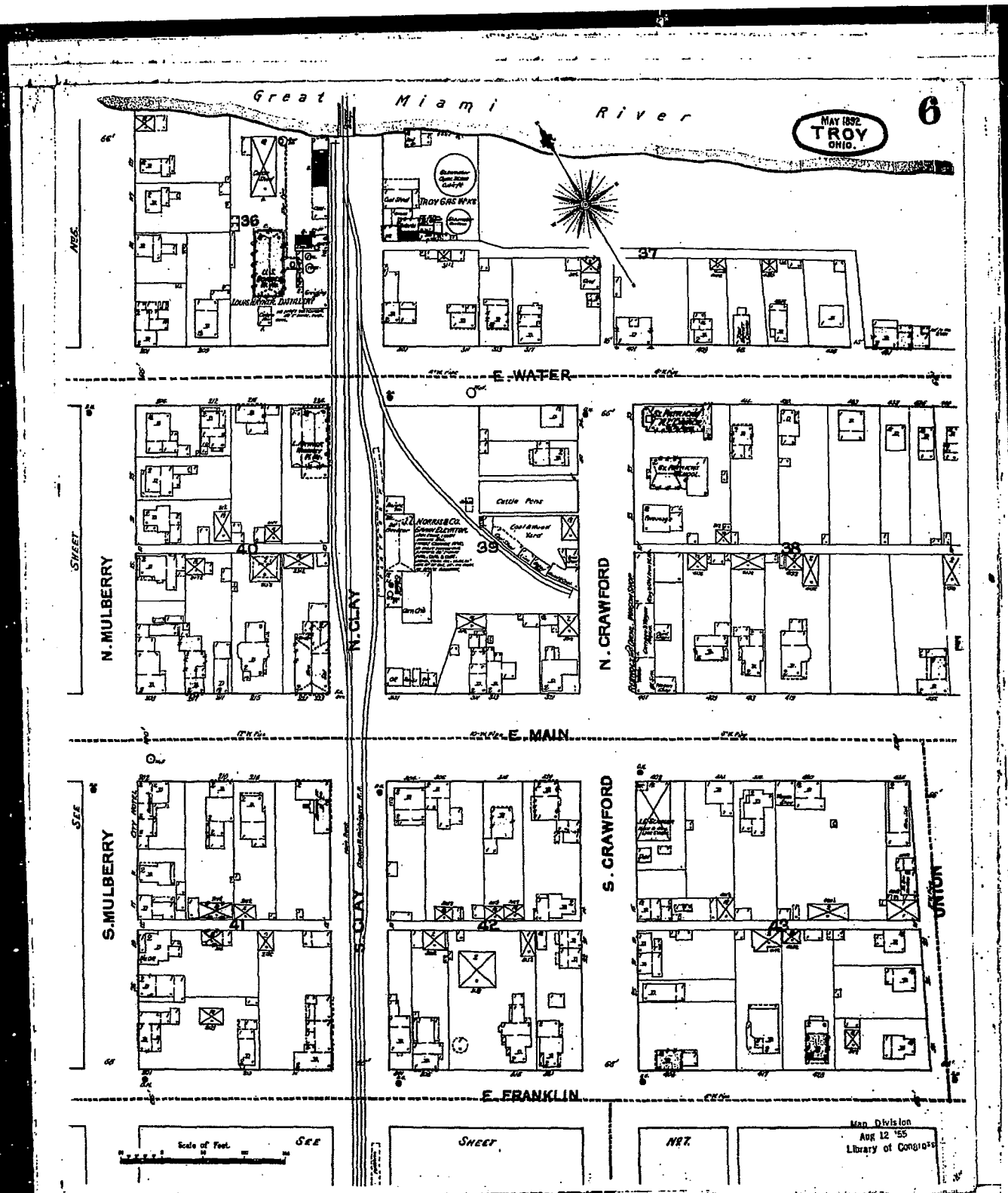

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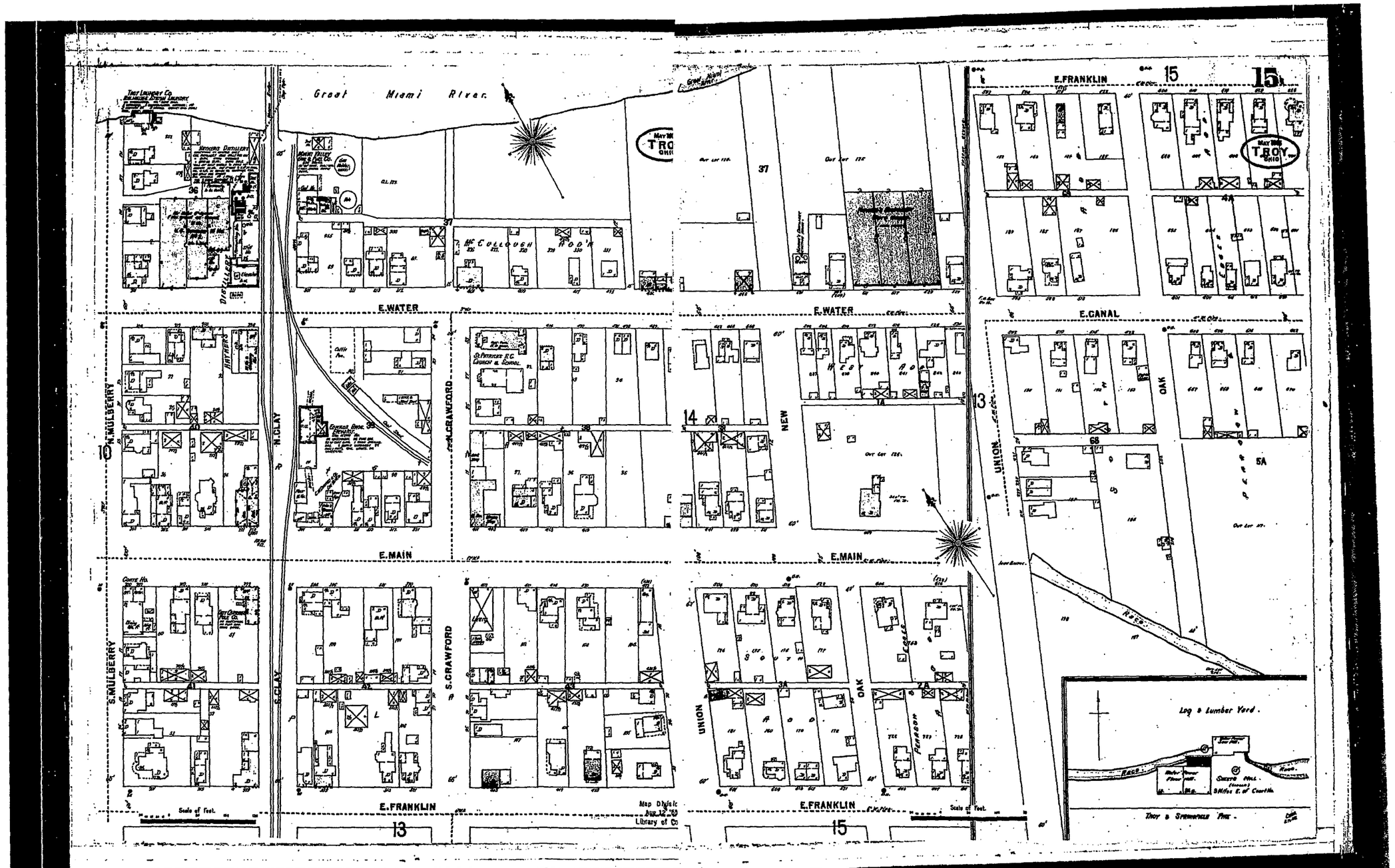

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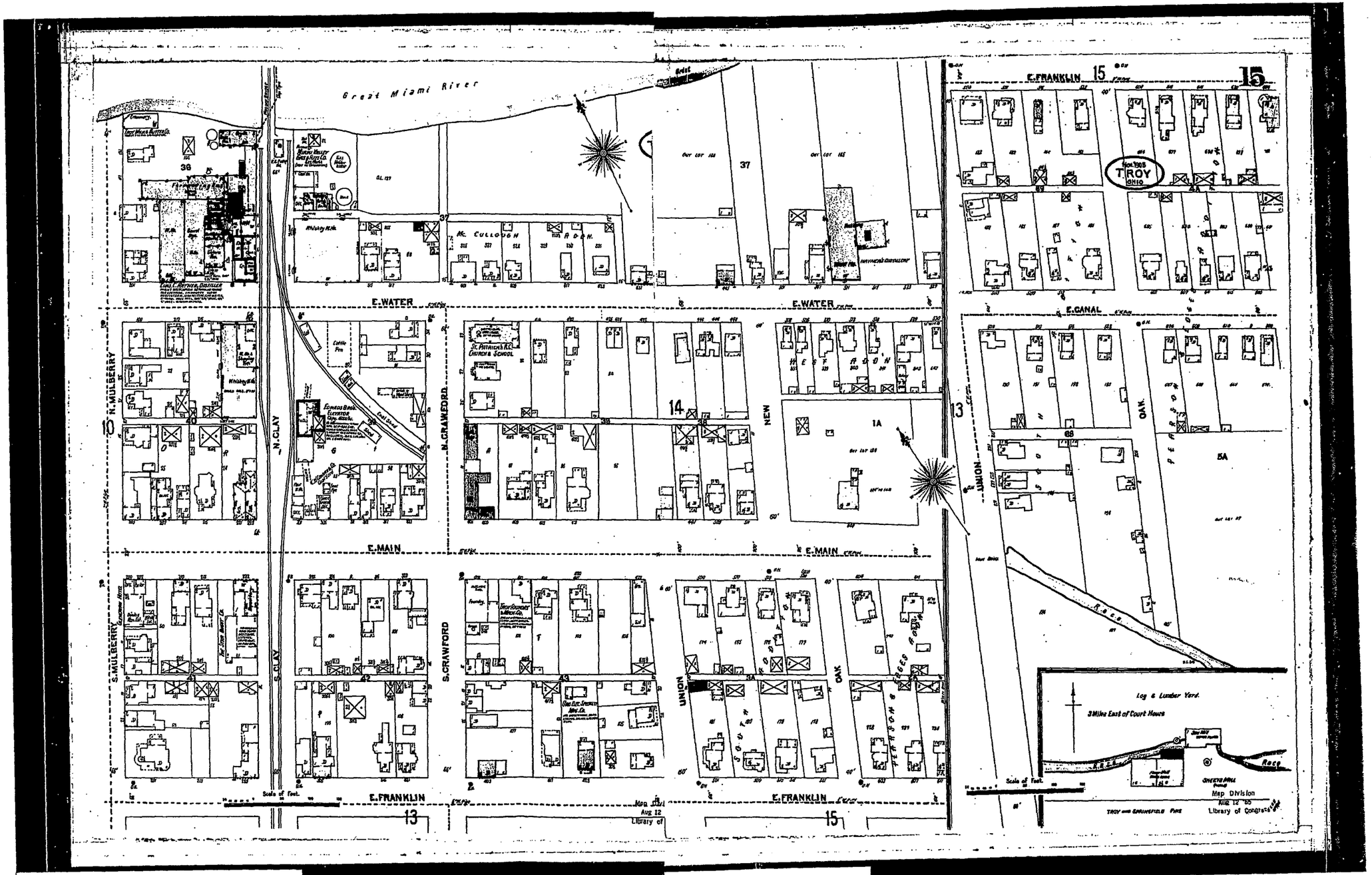

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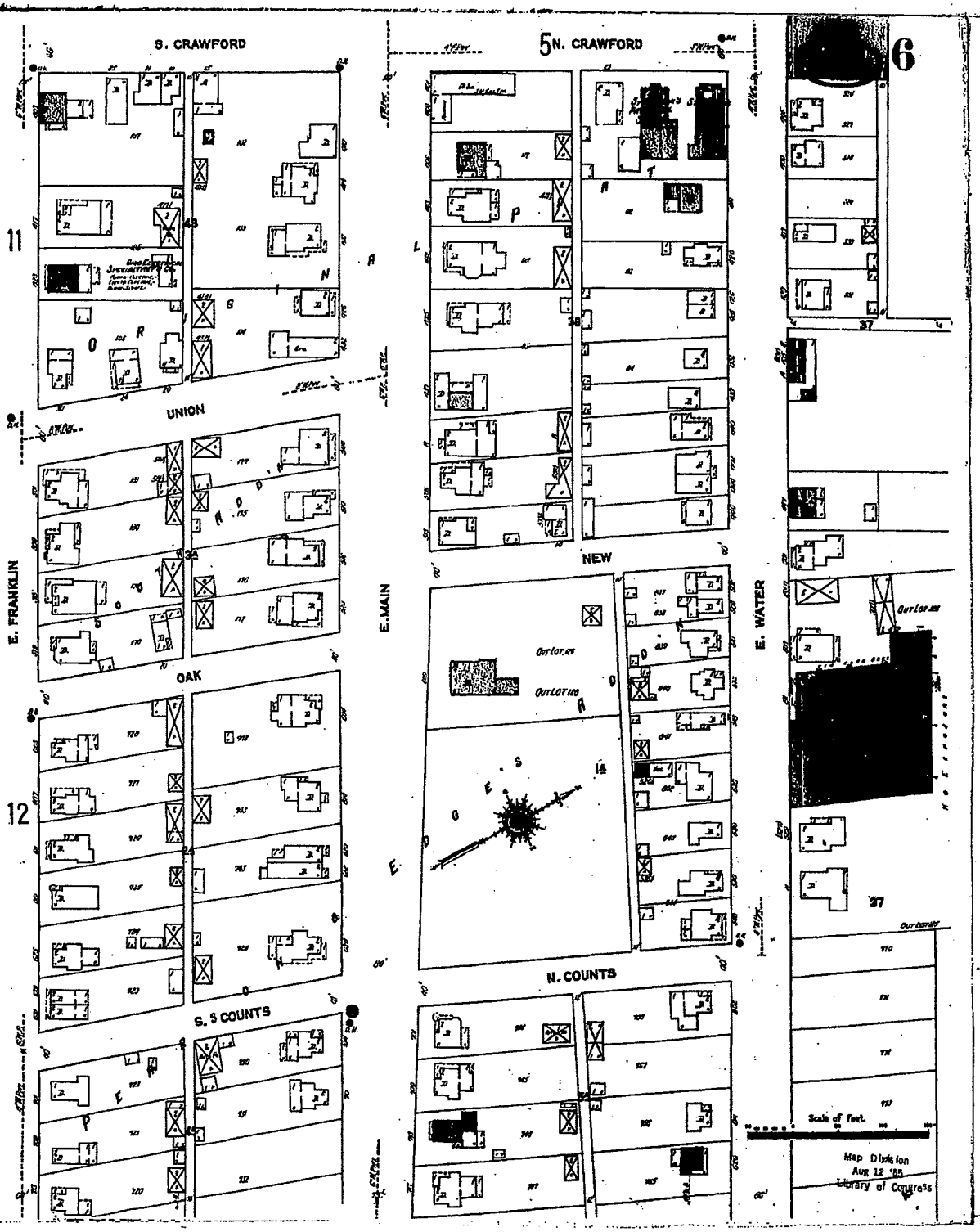

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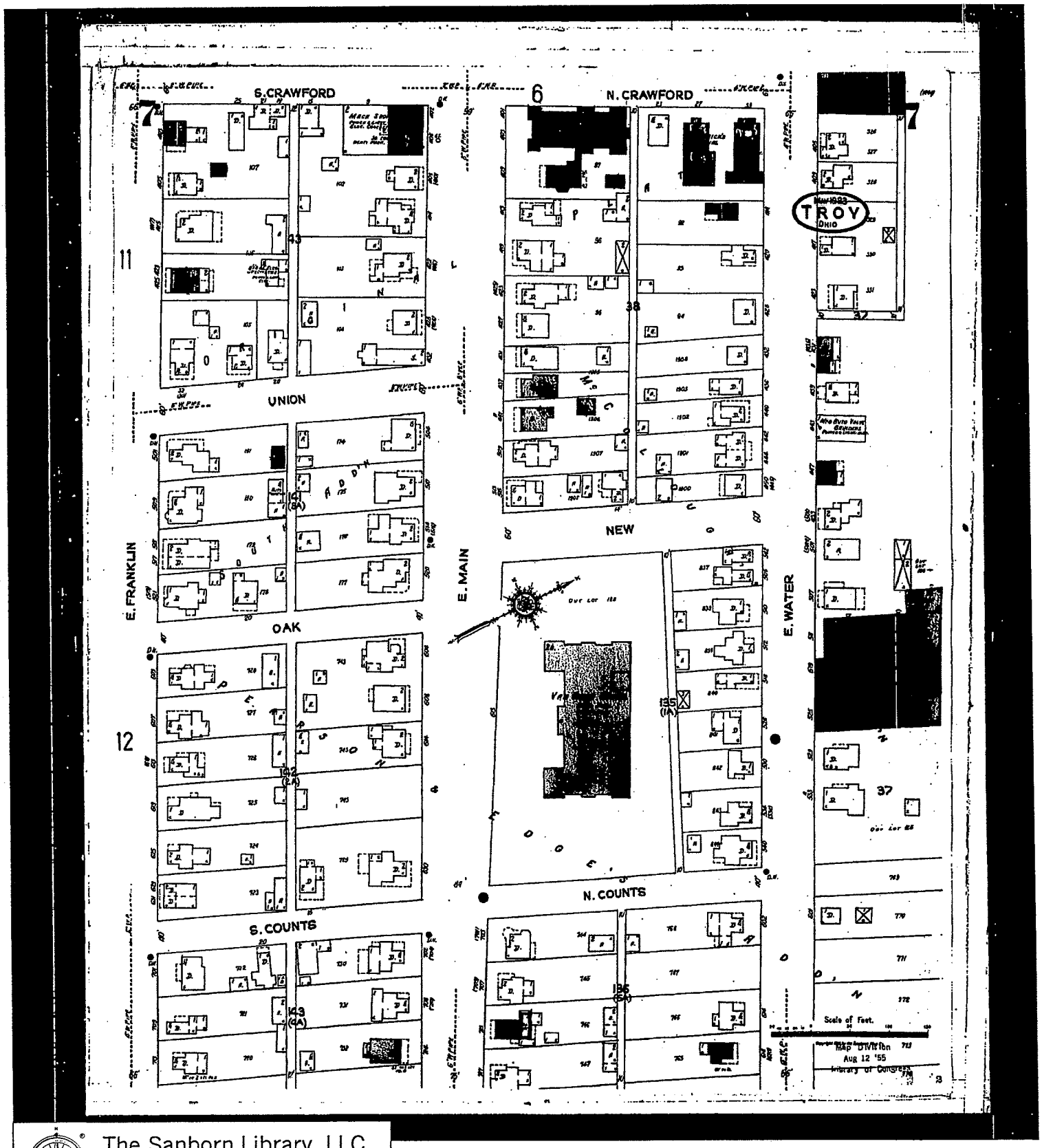

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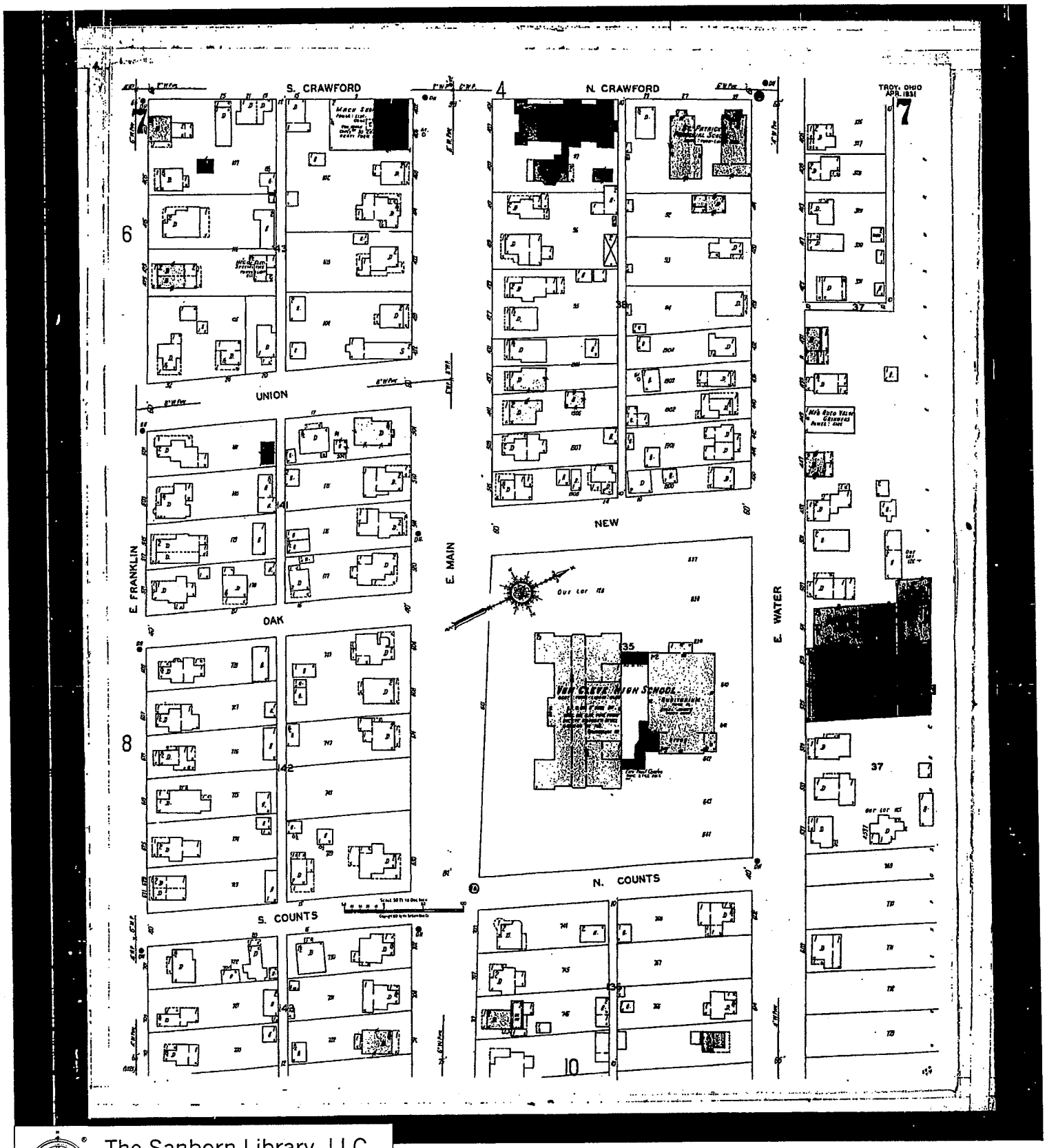

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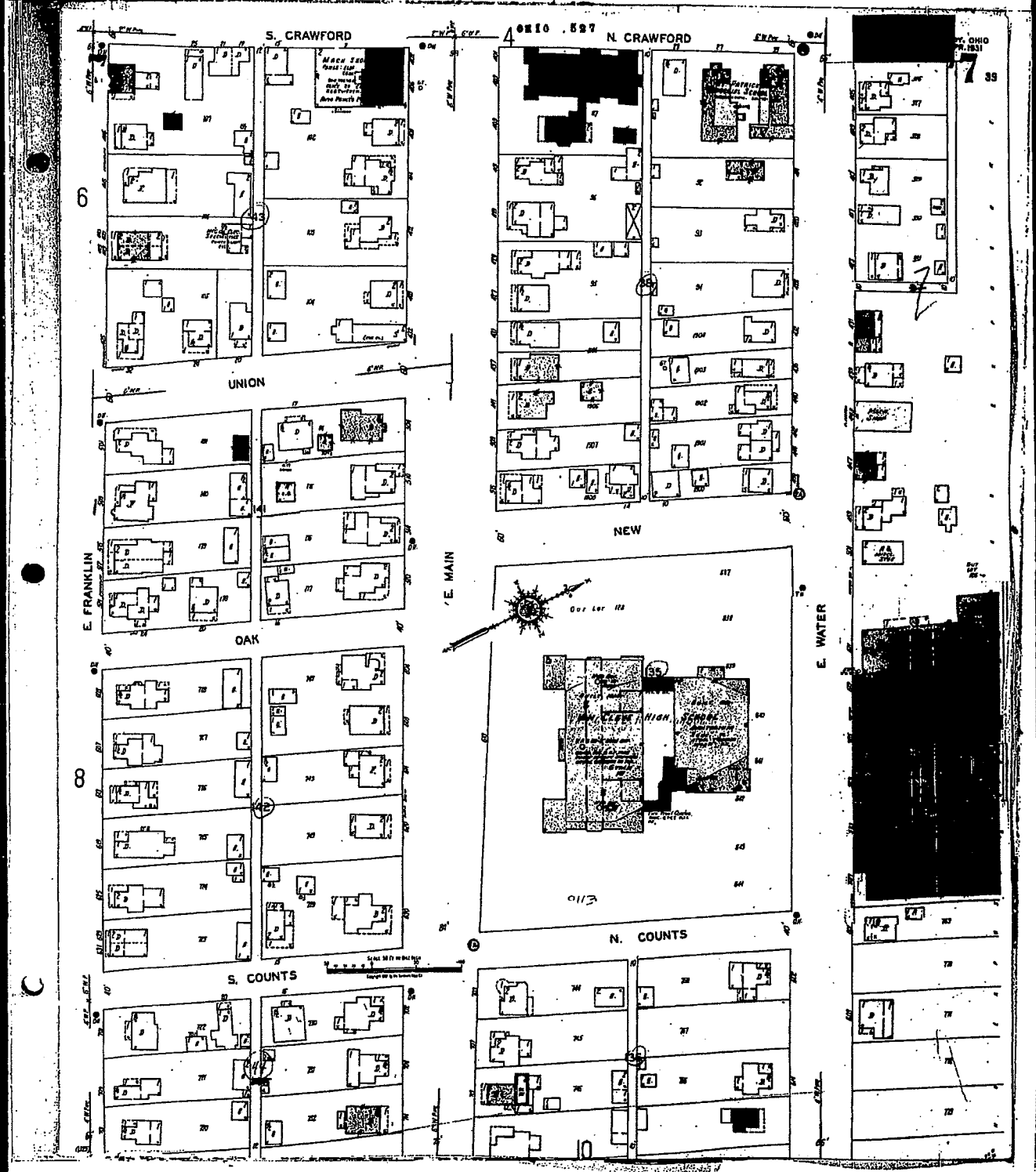

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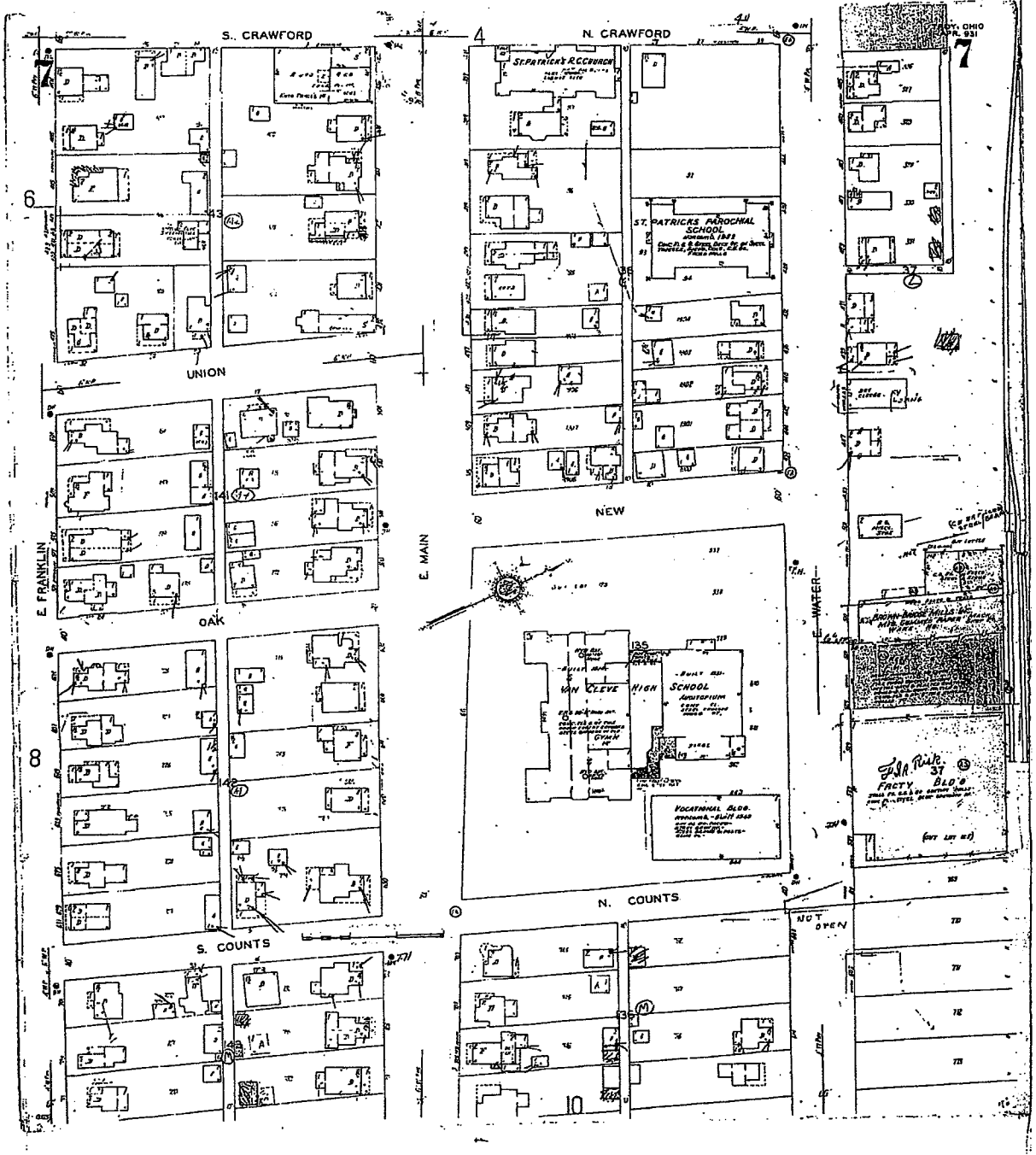

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The EDR-Historical Topographic Map Report

Spinnaker Coating
518 E. Water Street
Troy, OH 45373

January 30, 2002

Inquiry Number: 729028-5

Environmental Data Resources, Inc.
an edr company

The Source For Environmental Risk Management Data

3530 Post Road
Southport, Connecticut 06490

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802

Environmental Data Resources, Inc.
Historical Topographic Map Report

Environmental Data Resources, Inc.'s (EDR) Historical Topographic Map Report is designed to assist professionals in evaluating potential liability on a target property, and its surrounding area, resulting from past activities. ASTM E 1527-94, Section 7.3 on Historical Use Information, identifies the prior use requirements for a Phase I environmental site assessment. The ASTM standard requires a review of *reasonably ascertainable standard historical sources. Reasonably ascertainable is defined as information that is publicly available, obtainable from a source with reasonable time and cost constraints, and practically reviewable.*

To meet the prior use requirements of ASTM E 1527-94, Section 7.3.2, the following *standard historical sources* may be used: aerial photographs, city directories, fire insurance maps, topographic maps, property tax files, land title records (although these cannot be the sole historical source consulted), building department records, or zoning/and use records. ASTM E 1527-94 requires *"All obvious uses of the property shall be identified from the present, back to the property's obvious first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources as are necessary, and that are reasonably ascertainable and likely to be useful."* (ASTM E 1527-94, Section 7.3.2 page 11.)

EDR's Historical Topographic Map Report includes a search of available public and private color historical topographic map collections.

Topographic Maps

A topographic map (topo) is a color coded line-and-symbol representation of natural and selected artificial features plotted to a scale. Topos show the shape, elevation, and development of the terrain in precise detail by using contour lines and color coded symbols. Many features are shown by lines that may be straight, curved, solid, dashed, dotted, or in any combination. The colors of the lines usually indicate similar classes of information. For example, topographic contours (brown); lakes, streams, irrigation ditches, etc. (blue); land grids and important roads (red); secondary roads and trails, railroads, boundaries, etc. (black); and features that have been updated using aerial photography, but not field verified, such as disturbed land areas (e.g., gravel pits) and newly developed water bodies (purple).

For more than a century, the USGS has been creating and revising topographic maps for the entire country at a variety of scales. There are about 60,000 U.S. Geological Survey (USGS) produced topo maps covering the United States. Each map covers a specific quadrangle (quad) defined as a four-sided area bounded by latitude and longitude. Historical topographic maps are a valuable historical resource for documenting the prior use of a property and its surrounding area, and due to their frequent availability can be particularly helpful when other standard historical sources (such as city directories, fire insurance maps, or aerial photographs) are not reasonably ascertainable.

Please call EDR Nationwide Customer Service at
1-800-352-0050 (8am-8pm ET)
with questions or comments about your report.
Thank you for your business!

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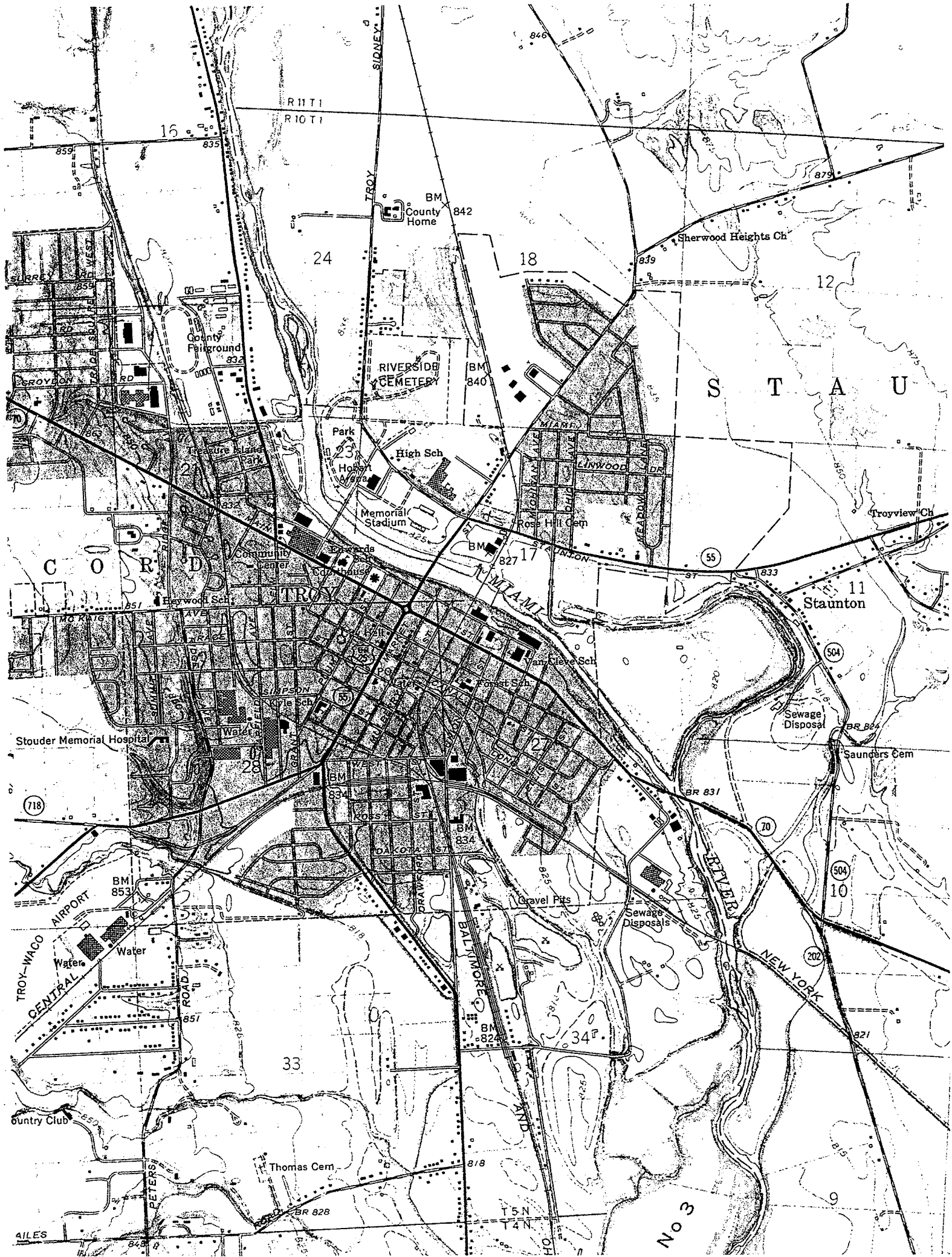


R 11 T 1
R 10 T 1
16
24
18
12
11
10
9
33
34
TROY
SIDNEY
County Home
BM 842
Sherwood Heights Ch
County Fairground
RIVERSIDE CEMETERY
BM 840
S T A U
Park
High Sch
Hobart Arena
Treasure Island Park
Memorial Stadium
Rose Hill Cem
Troyview Ch
Community Center
Courthouse
C O R D
TROY
Heywood Sch
MIAMI
Staunton
Van Cleve Sch
Forest Sch
Kyle Sch
Water
Stouder Memorial Hospital
Sewage Disposal
Saunders Cem
BR 831
BM 834
BM 853
AIRPORT
TROY-WACO
CENTRAL
Water
Gravel Pits
Sewage Disposals
RIVER
NEW YORK
BALTIMORE
AND
BM 824
ROAD
Country Club
Thomas Cem
BR 828
T 5 N
T 4 N
No 3

Inquiry Number: 729628-5

TP Quad [✓] Adj Quad [] ↑N

Quad Troy

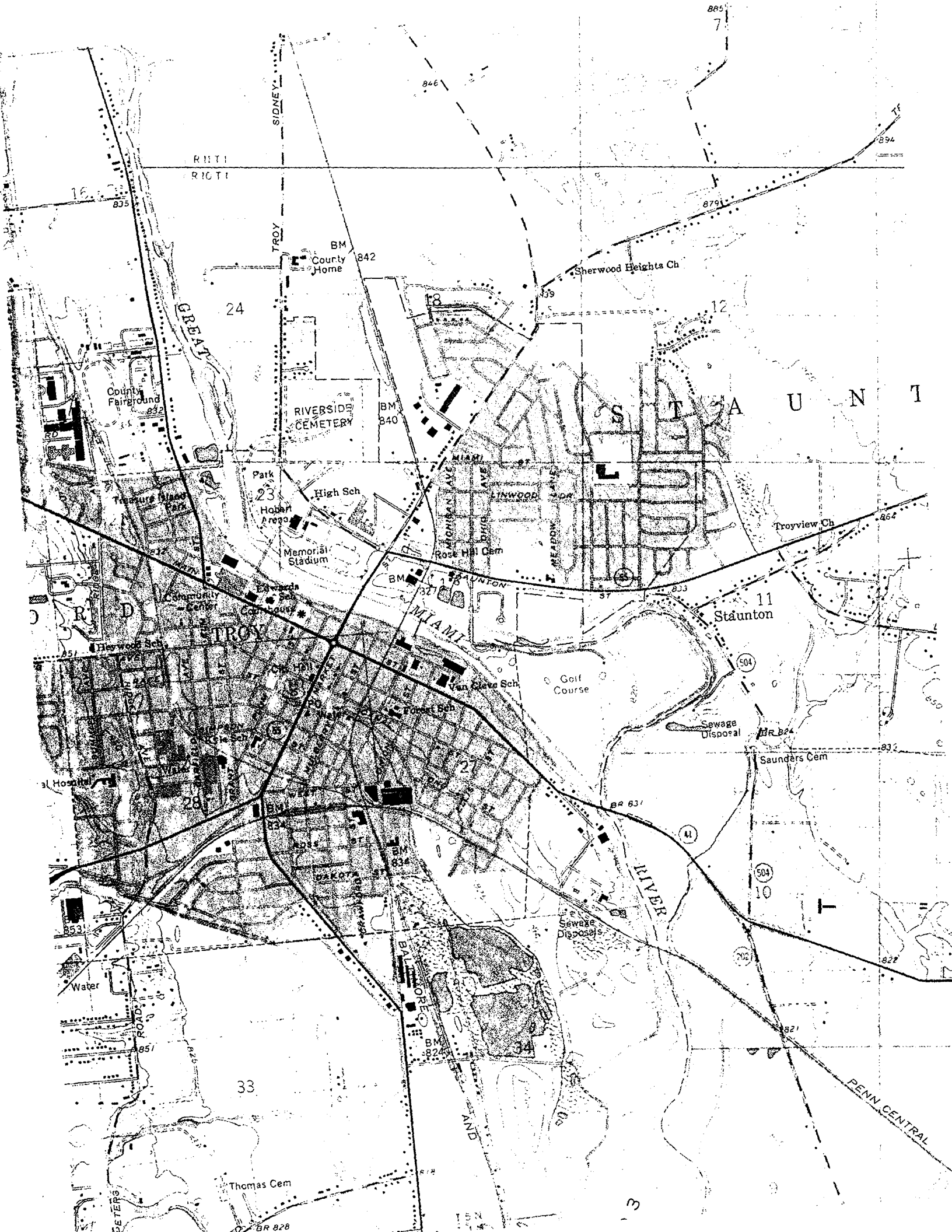
Minute Series [✓] 7.5 [] 15 [] 30 [] 30x60

Year 1961 []Provisional Edition []Revised

[]Photorevised []Inspected from _____

Scale [✓] 1:24,000 [] 1:25,000 [] 1:50,000

[] 1:62,500 [] 1:100,000 [] 1:125,000



SIDNEY
TROY
County Home
BM 842
Sherwood Heights Ch
GREAT
County Fairground
RIVERSIDE CEMETERY
BM 840
S T A U N T
Park
High Sch
Hobart Arena
Memorial Stadium
Treasure Island Park
Rose Hill Cem
Troyview Ch
Staunton
Community Center
Edwards Sch
Courthouse
TROY
MIAMI
Heywood Sch
Van Cleve Sch
Golf Course
Forest Sch
Sewage Disposal
Saunders Cem
Water
RIVER
Sewage Disposals
Water
BALTIMORE AND
PENN CENTRAL
Thomas Cem

Inquiry Number: 729028-5

TP Quad [✓] Adj Quad [] ↑N

Quad Troy

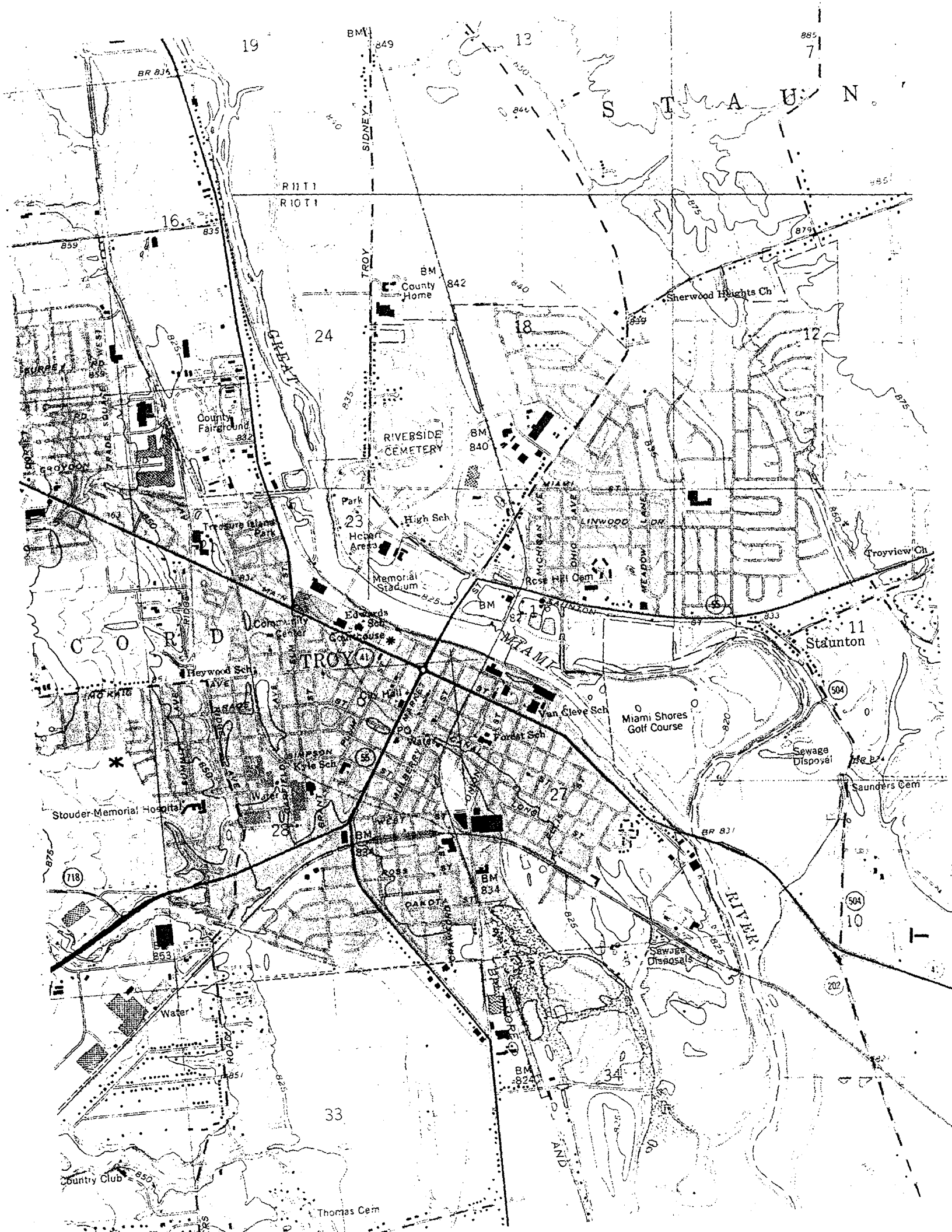
Minute Series [✓] 7.5 [] 15 [] 30 [] 30x60

Year 1972 []Provisional Edition []Revised

[✓]Photorevised []Inspected from 1961

Scale [✓] 1:24,000 [] 1:25,000 [] 1:50,000

[] 1:62,500 [] 1:100,000 [] 1:125,000



S T A U N
C O R D
TROY
Staunton
Sherwood Heights Ch
Troyview Ch
County Home
County Fairground
RIVERSIDE CEMETERY
Park
High Sch
Hobart Area
Memorial Stadium
Rose Hill Cem
Edwards Sch
Courthouse
Community Center
Heywood Sch
City Hall
Van Cleve Sch
Forest Sch
Miami Shores Golf Course
Sewage Disposal
Saunders Cem
Kyle Sch
Stouder Memorial Hospital
Water
Sewage Disposals
Country Club
Thomas Cem
GREAT
MIAMI
RIVER
TROY SIDNEY
R11T1
R10T1

Inquiry Number: 729028-5

TP Quad [✓] Adj Quad [] ↑N

Quad Troy

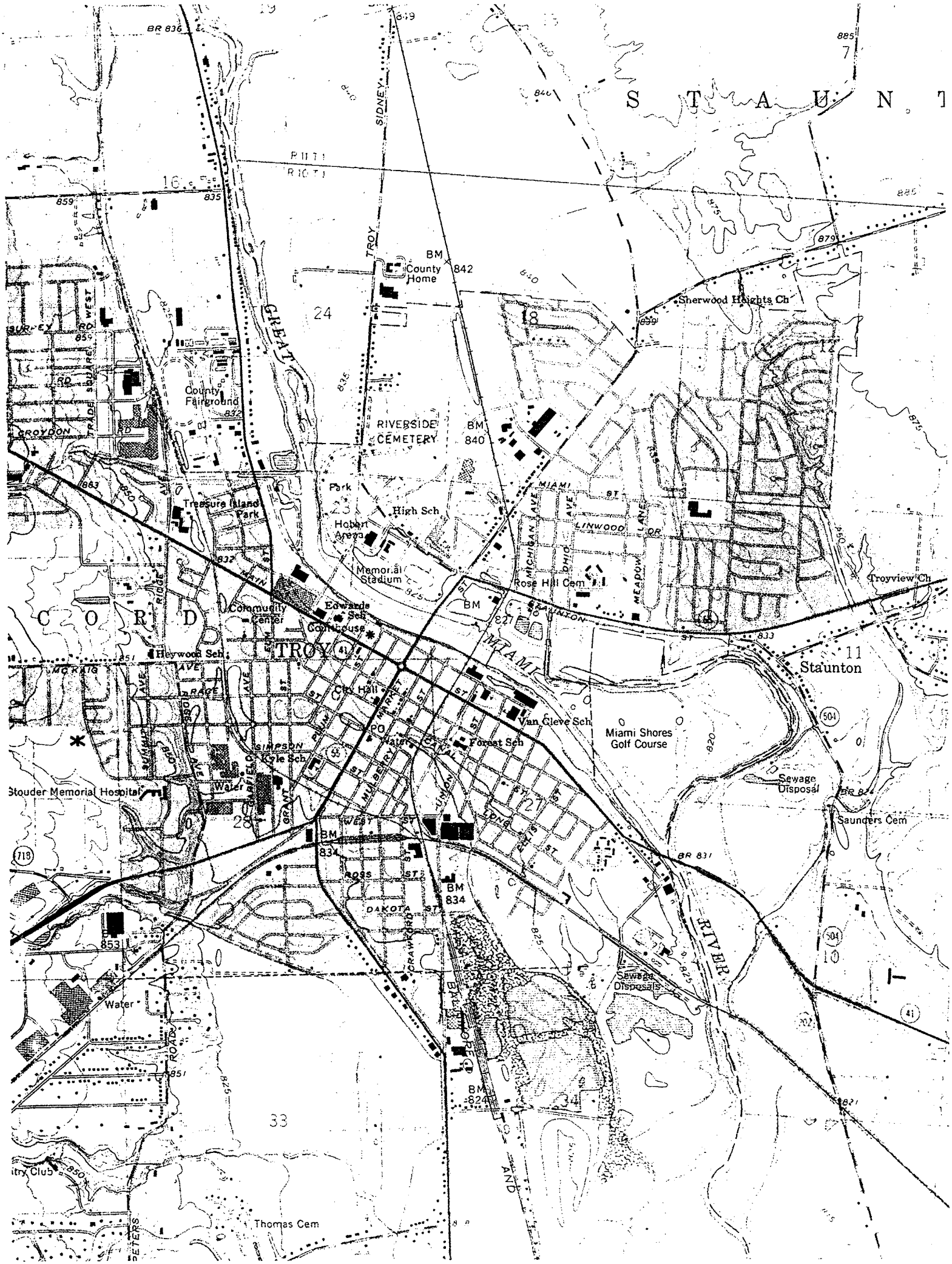
Minute Series [✓] 7.5 [] 15 [] 30 [] 30x60

Year 1982 []Provisional Edition []Revised

[✓]Photorevised []Inspected from 1961

Scale [✓] 1:24,000 [] 1:25,000 [] 1:50,000

[] 1:62,500 [] 1:100,000 [] 1:125,000



S T A U N T
County Home
BM 842
Sherwood Heights Ch
County Fairground
RIVERSIDE CEMETERY
BM 840
Park
High Sch
Hobart Arena
Memorial Stadium
Treasure Island Park
Rose Hill Cem
Troyview Ch
Community Center
Edwards Sch
Courthouse
C O R D
TROY
Heywood Sch
City Hall
Staunton
Van Cleve Sch
Miami Shores Golf Course
Forest Sch
Kyle Sch
Water
Stouder Memorial Hospital
Sewage Disposal
Saunders Cem
BM 834
BM 834
BM 824
Sewage Disposals
Water
Thomas Cem
GREAT
MIAMI
RIVER
TROY
SIDNEY
MIAMI ST
LINWOOD DR
MEADOW LANE
MICHIGAN AVE
OHIO AVE
STAUNTON ST
MAIN ST
RIDGE AVE
MC KAIG AVE
RACE ST
SIMPSON
MARKET ST
PLUM ST
MULBERRY ST
UNION ST
CANAL ST
LONG ST
ELLIS ST
WEST ST
ROSS ST
DAKOTA ST
CRAWFORD
GRANT
SUMMIT AVE
SURREY RD
TRADE SQUARE WEST
CROYDON RD
BALTIMORE AND
PETERS ROAD
BR 836
BR 831
BR 824

Inquiry Number: 729028-5

TP Quad [] Adj Quad [] ↑N

Quad Troy

Minute Series [] 7.5 [] 15 [] 30 [] 30x60

Year 1984 []Provisional Edition []Revised

[]Photorevised []Inspected from 1961

Scale [] 1:24,000 [] 1:25,000 [] 1:50,000

[] 1:62,500 [] 1:100,000 [] 1:125,000

Appendix F
City Directories, Historical Topographic Maps and Telephone Interviews for Plant No. 2

The EDR-City Directory
Abstract

Spinnaker Coating
518 E. Water Street
Troy, OH 45373

February 01, 2002

Inquiry Number: 729028-6

Environmental Data Resources, Inc.

***The* Source For Environmental Risk Management Data**

3530 Post Road
Southport, Connecticut 06490

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802

Environmental Data Resources, Inc.
City Directory Abstract

Environmental Data Resources, Inc.'s (EDR) City Directory Abstract is a screening tool designed to assist professionals in evaluating potential liability on a target property resulting from past activities. ASTM E 1527-00, Section 7.3 on Historical Use Information, identifies the prior use requirements for a Phase I environmental site assessment. The ASTM standard requires a review of *reasonably ascertainable standard historical sources. Reasonably ascertainable means information that is publicly available, obtainable from a source with reasonable time and cost constraints, and practically reviewable.*

To meet the prior use requirements of ASTM E 1527-00, Section 7.3.4, the following *standard historical sources* may be used: aerial photographs, fire insurance maps, property tax files, land title records (although these cannot be the sole historical source consulted), topographic maps, city directories, building department records, or zoning/land use records. ASTM E 1527-00 requires *All obvious uses of the property shall be identified from the present, back to the property's obvious first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources as are necessary, and that are reasonably ascertainable and likely to be useful.*(ASTM E 1527-00,Section 7.3.4, page 12. EDR's City Directory Abstract includes a search and abstract of available city directory data.

City Directories
City directories have been published for cities and towns across the U.S. since the 1700s. Originally a list of residents, the city directory developed into a sophisticated tool for locating individuals and businesses in a particular urban or suburban area. Twentieth century directories are generally divided into three sections: a business index, a list of resident names and addresses, and a street index. With each address, the directory lists the name of the resident or, if a business is operated from this address, the name and type of business (if unclear from the name). While city directory coverage is comprehensive for major cities, it may be spotty for rural areas and small towns. ASTM E 1528-00 specifies that a *review of city directories (standard historical sources) at less than approximately five year intervals is not required by this practice. (ASTM E 1528-00, Section 7.3.4, page 12.)*

Please call EDR Nationwide Customer Service at
1-800-352-0050 (8am-8pm EST)
with questions or comments about your report.
Thank you for your business!

Disclaimer
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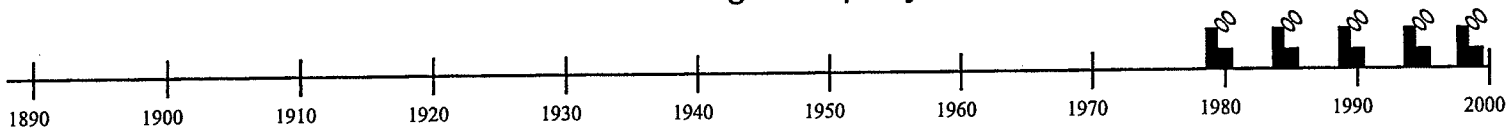
Environmental Data Resources, Inc.

Prior Use Report® Timeline

Target Property



Legend:

= Historical Topographic Map (**HT**)

= National Wetland Inventory Map (**WT**) *

= Flood Prone/FEMA Maps (**FP/FR**) *

= Aerial Photos Included (**P**) *

= Aerial Photos Available *

= Residential (**R**)

= Commercial or Industrial (**C**)

Superscript number corresponds to graph ID in text

**Displayed on timeline when aerial photos, flood prone, FEMA, wetland maps, or Aerial Research Summary are purchased.*

Target Property: Spinnaker Coating
Address: 518 E. Water Street
City/State/Zip: Troy, OH 45373

Customer: ERM, Inc.
Contact: Leigh Anne Sievert
Inquiry #: 729028-6
Date: 2/1/2002

4. SUMMARY

- ***City Directories:***

Business directories including city, cross reference and telephone directories were reviewed, if available, at approximately five year intervals for the years spanning 1980 through 1999. (These years are not necessarily inclusive.) A summary of the information obtained is provided in the text of this report.

Date EDR Searched Historical Sources:
City Directories Feb 01, 2002

Target Property:
518 E. Water Street
Troy, OH 45373

PUR ID *Year*	*Uses*	*Portion-Findings (FIM Information Only)*	*Source*
-- 1980	Brownbridge		Haines Criss Cross Directory
	KimberlyClark		
-- 1985	Brownbridge		Haines Criss Cross Directory
	KimberlyClark		
-- 1990	Brownbridge		Haines Criss Cross Directory
	KimberlyClark		
-- 1995	Brownbridge		Haines Criss Cross Directory
	KimberlyClark		
-- 1999	Brown Bridge Ind		Haines Criss Cross Directory

Adjoining Properties

SURROUNDING
Multiple Addresses
Troy, OH 45373

PUR ID *Year*	*Uses*	*Portion-Findings (FIM Information Only)*	*Source*
1980	**E Water**		Haines Criss Cross Directory
	St Patrick School (420)		
	Residence (423)		
	No Return (450)		
	Troy City School (523)		
	-No other listings within range		
1985	**E Water**		Haines Criss Cross Directory
	St Patrick School (420)		
	Residence (423)		
	No Return (450)		
	Troy City School (523)		
	-No other listings within range		
1990	**E Water**		Haines Criss Cross Directory
	St Patrick School (420)		
	Residence (423)		

PUR ID Year	Uses	Portion-Findings (FIM Information Only)	Source
1990 (continued)			
	No Return (450)		
	Troy City School (523)		
	-No other listings within range		
1995	**E Water**		Haines Criss Cross Directory
	St Patrick School (420)		
	Residence (423)		
	No Return (450)		
	Troy City School (523)		
	-No other listings within range		
1999	**E Water**		Haines Criss Cross Directory
	St Patrick School (420)		
	Residence (423)		
	No Return (450)		
	Troy City School (523)		
	-No other listings within range		

Glossary of Terms

A.A.A.

Aerial photograph flyer: Agriculture Adjustment Administration (Federal).

A.S.C.S

Aerial photograph flyer: Agricultural Stabilization and Conservation Service (Federal)

Address in Research Source

Indicates that a property is listed at a different address than the one provided by the user. Generally occurs when a property is located on a corner or, when the physical address of a property is different than its mailing address.

Address Not Listed in Research Source

Occurs when a specific site address is not listed in city directories and/or fire insurance maps.

Adjoining

Any property that is contiguous, or a property that would be contiguous if not for a public thoroughfare, to the target property. *To differentiate from each adjoining property, stand at the target property's "front door" facing the street.*

Adjoining Back

Property directly to the rear of the target property. (Applies only to fire insurance map data.)

Adjoining Front

Property directly in front of the target property. (Applies only to fire insurance map data.)

Adjoining Left

Property directly to the left of the target property. (Applies only to fire insurance map data.)

Adjoining Right

Property directly to the right of the target property. (Applies only to fire insurance map data.)

Adjoining Surrounding Area

Property that may adjoin the target property but due to lack of specific map information cannot be located precisely. This situation typically occurs when city directory information, but not fire insurance map information, is available.

C.A.S

Aerial photograph flyer: Chicago Aerial Survey (private).

C.S.S.

Aerial photograph flyer: Commodity Stabilization Service (Federal).

Cartwright

Aerial photograph flyer: Cartwright (private)

CD

City Directory

Commercial

Any property including, but not limited to, property used for industrial, retail, office, agricultural, other commercial, medical, or educational purposes; property used for residential purposes that has more than four residential dwelling units.

Commercial or Industrial

Property that has either a commercial *or* an industrial use. Examples include retail stores, manufacturing facilities, factories, and apartment buildings.

D.N.R.

Aerial photograph flyer: Department of National Resources (state).

D.O.T.

Aerial photograph flyer: Department of Transportation (state).

Fairchild

Aerial photograph flyer: Fairchild (private).

FIM

Fire Insurance Map

Flood Insurance Rate Maps

Flood Insurance Rate Maps are produced by the Federal Emergency Management Agency (FEMA). These maps indicate special flood hazard areas, base flood elevations and flood insurance risk zones.

Flood Prone Area Maps

Flood Prone Area maps are produced by the United States Geological Survey (USGS). Areas identified as flood prone have been determined by available information gathered from past floods.

F.S.

Aerial photograph flyer: Forest Service (Federal).

Geonex

Aerial photograph flyer: Geonex (private).

M.C.

Aerial photograph flyer: Metropolitan Council of the Twin Cities Area (state).

Mark Hurd

Aerial photograph flyer: Mark Hurd (private)

N.A.P.P.

Aerial photograph flyer: National Aerial Photography Program (Federal).

National Wetland Inventory Maps

National Wetland Inventory Maps are produced by the U.S. Fish and Wildlife Service, a division of the U.S. Department of the Interior. Wetland and deepwater habitat information is identified on a 7.5 minute U.S.G.S. topographic map. The classification system used categorizes these habitats into five systems: marine, estuarine, riverine, lacustrine and palustrine.

No Return

Indicates that site owner was unavailable at time of surveyor's contact. *(Applies only to city directories.)*

No Structure Identified on Parcel

Used when site boundaries and/or site address is indicated on a fire insurance map; no structure details exist.

Other

Occurs when the site's classification is different that EDR's standard categories. Examples may include undeveloped land and buildings with no specified function.

P.M.A.

Aerial photograph flyer: Production and Marketing Administration (Federal).

Pacific Aerial

Aerial photograph flyer: Pacific Aerial (private)

Portion

Refers to the fire insurance map information identified on the four quadrants of a target or adjoining property. The portions are referred to as *Frontright*, *Frontleft*, *Backright*, and *Backleft* and are determined as if one were standing at the front door, facing the street.

Property Not Defined

Used when property is not clearly demarcated on a fire insurance map.

Residential

Any property having fewer than five dwelling units used exclusively for residential purposes.

Residential with Commercial Uses (a.k.a. Multiple Purpose Address)

A business (firm) and residence at the same address. Examples include a doctor, attorney, etc. working out of his/her home.

Sidwell

Aerial photograph flyer: Sidwell (private).

Site Not Mapped

Occurs when an adjoining property has not been mapped by fire insurance map surveyors. (Applies only to fire insuance map data.)

Teledyne

Aerial photograph flyer: Teledyne (private)

Topographic Maps

Topographic maps are produced by the United States Geological Survey (USGS). These maps are color coded line and symbol representations of natural and selected artificial features plotted to scale.

Turnbow

Aerial photograph flyer: Michael Turnbow (private)

U.S.D.A.

Aerial photograph flyer: United States Department of Agriculture (Federal).

U.S.D.I.

Aerial photograph flyer: United States Department of the Interior (Federal).

U.S.G.S.

Aerial photograph flyer: United States Geological Survey (Federal).

Vacant

May refer to an unoccupied structure or land. *Used only when fire insurance map or city directory specifies 'vacant.'*

W.P.A.

Aerial photograph flyer: Works Progress Administration (Federal).

WALLACE

Aerial photograph flyer: Wallace (private).

The EDR-Historical Topographic Map Report

Spinnaker Coating
30 Mary Bill Drive
Troy, OH 45373

January 30, 2002

Inquiry Number: 729029-5

Environmental Data Resources, Inc.
an edr company

The Source For Environmental Risk Management Data

3530 Post Road
Southport, Connecticut 06490

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802

Environmental Data Resources, Inc.
Historical Topographic Map Report

Environmental Data Resources, Inc.'s (EDR) Historical Topographic Map Report is designed to assist professionals in evaluating potential liability on a target property, and its surrounding area, resulting from past activities. ASTM E 1527-94, Section 7.3 on Historical Use Information, identifies the prior use requirements for a Phase I environmental site assessment. The ASTM standard requires a review of *reasonably ascertainable standard historical sources. Reasonably ascertainable is defined as information that is publicly available, obtainable from a source with reasonable time and cost constraints, and practically reviewable.*

To meet the prior use requirements of ASTM E 1527-94, Section 7.3.2, the following *standard historical sources* may be used: aerial photographs, city directories, fire insurance maps, topographic maps, property tax files, land title records (although these cannot be the sole historical source consulted), building department records, or zoning/and use records. ASTM E 1527-94 requires *"All obvious uses of the property shall be identified from the present, back to the property's obvious first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources as are necessary, and that are reasonably ascertainable and likely to be useful."* (ASTM E 1527-94, Section 7.3.2 page 11.)

EDR's Historical Topographic Map Report includes a search of available public and private color historical topographic map collections.

Topographic Maps

A topographic map (topo) is a color coded line-and-symbol representation of natural and selected artificial features plotted to a scale. Topos show the shape, elevation, and development of the terrain in precise detail by using contour lines and color coded symbols. Many features are shown by lines that may be straight, curved, solid, dashed, dotted, or in any combination. The colors of the lines usually indicate similar classes of information. For example, topographic contours (brown); lakes, streams, irrigation ditches, etc. (blue); land grids and important roads (red); secondary roads and trails, railroads, boundaries, etc. (black); and features that have been updated using aerial photography, but not field verified, such as disturbed land areas (e.g., gravel pits) and newly developed water bodies (purple).

For more than a century, the USGS has been creating and revising topographic maps for the entire country at a variety of scales. There are about 60,000 U.S. Geological Survey (USGS) produced topo maps covering the United States. Each map covers a specific quadrangle (quad) defined as a four-sided area bounded by latitude and longitude. Historical topographic maps are a valuable historical resource for documenting the prior use of a property and its surrounding area, and due to their frequent availability can be particularly helpful when other standard historical sources (such as city directories, fire insurance maps, or aerial photographs) are not reasonably ascertainable.

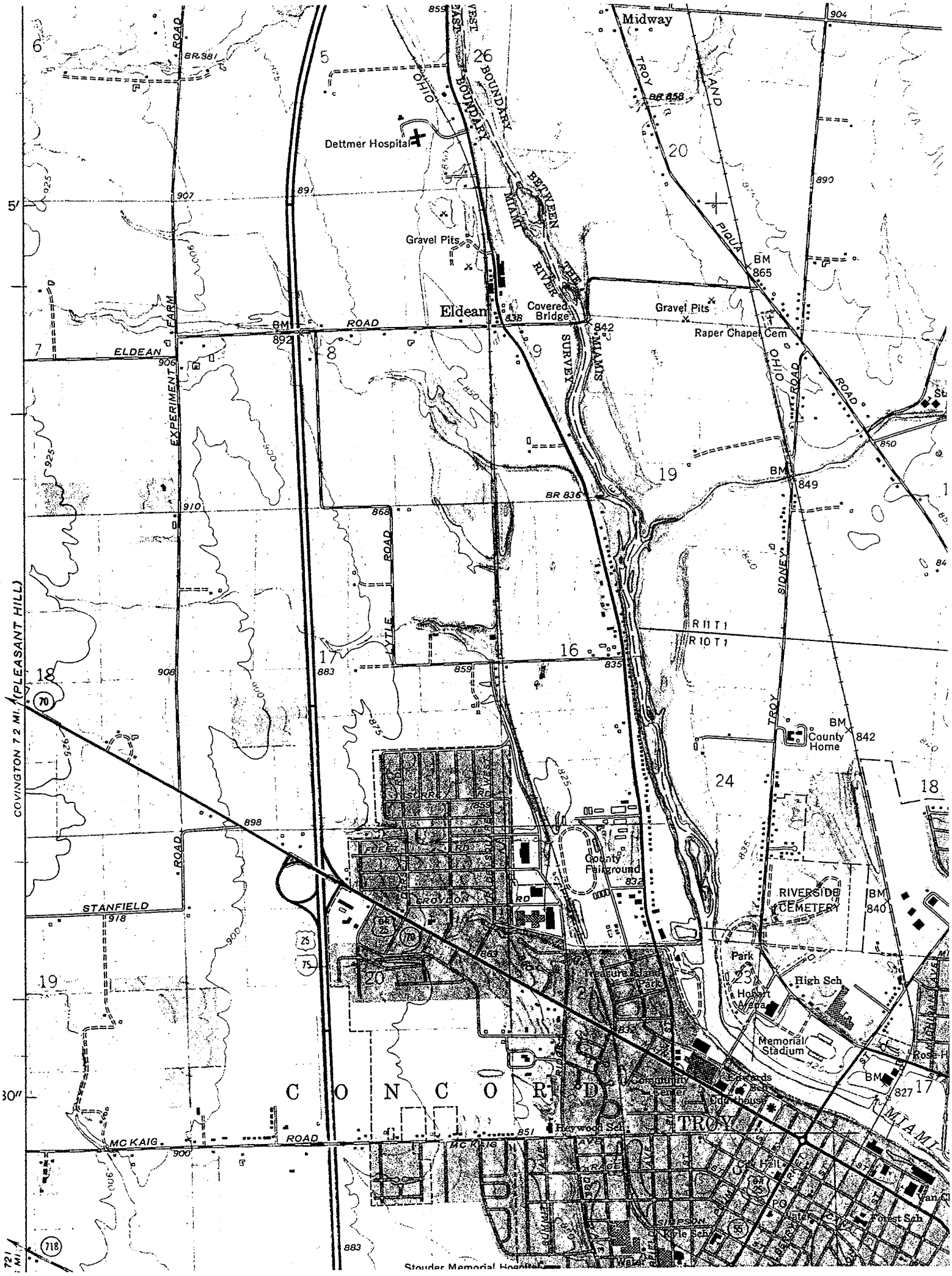
Quadrangle Relation Chart

7.5 minute series
Scale = 1: 24,000

Inquiry # 229029-5

Adjoining Quadrant	Target Quadrant
Pleasant Hill	Troy

N



Midway
Dettmer Hospital
Gravel Pits
Eldean
Covered Bridge
Gravel Pits
Raper Chapel Cem
ELDEAN ROAD
EXPERIMENT FARM
OHIO BOUNDARY
BETWEEN THE MIAMI RIVER SURVEY
TROY PIQUA ROAD
SIDNEY ROAD
LYTLE ROAD
R 11 T 1
R 10 T 1
County Home
County Fairground
RIVERSIDE CEMETERY
Park
High Sch
Hobart Arena
Memorial Stadium
Treasure Island Park
Community Center
Courthouse
Heywood Sch
City Hall
Forest Sch
Kyle Sch
Stouder Memorial Hospital
STANFIELD ROAD
MC KAIG ROAD
COVINGTON 7.2 MI. (PLEASANT HILL)
C O N C O R D
TROY
MIAMI

Inquiry Number: 729029-5

TP Quad [X] Adj Quad [] ↑N

Quad Troy

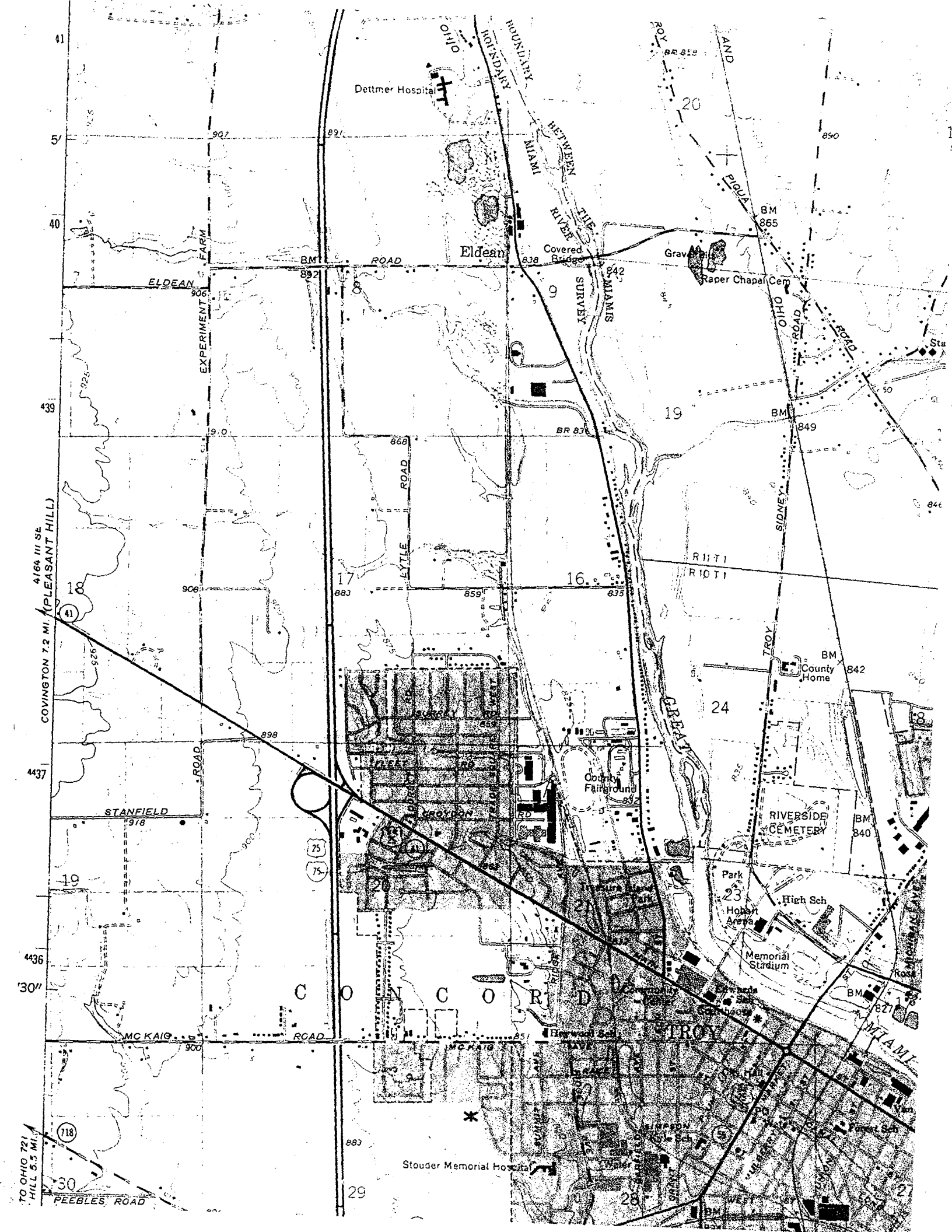
Minute Series [X] 7.5 [] 15 [] 30 [] 30x60

Year 1961 []Provisional Edition []Revised

[]Photorevised []Inspected from _____

Scale [X] 1:24,000 [] 1:25,000 [] 1:50,000

[] 1:62,500 [] 1:100,000 [] 1:125,000



Dettmer Hospital
OHIO BOUNDARY
BOUNDARY
BETWEEN THE MIAMI RIVER
MIAMIS SURVEY
Eldean
Covered Bridge
Raper Chapel Cem
PIQUA ROAD
OHIO ROAD
ELDEAN ROAD
EXPERIMENT FARM
LYTLE ROAD
SIDNEY ROAD
TROY
R11T1
R10T1
County Home
GREAT
County Fairground
RIVERSIDE CEMETERY
Park
High Sch
Hobart Arena
Memorial Stadium
Treasure Island Park
Edwards Sch
Courthouse
Heywood Sch
C O N C O R D
TROY
MC KAIG ROAD
Stouder Memorial Hospital
PEEBLES ROAD
STANFIELD ROAD
COVINGTON 7.2 MI.
4164 III SE
(PLEASANT HILL)
TO OHIO 721
HILL 5.5 MI.

Inquiry Number: 729029-5

TP Quad [x] Adj Quad [] ↑N

Quad Troy

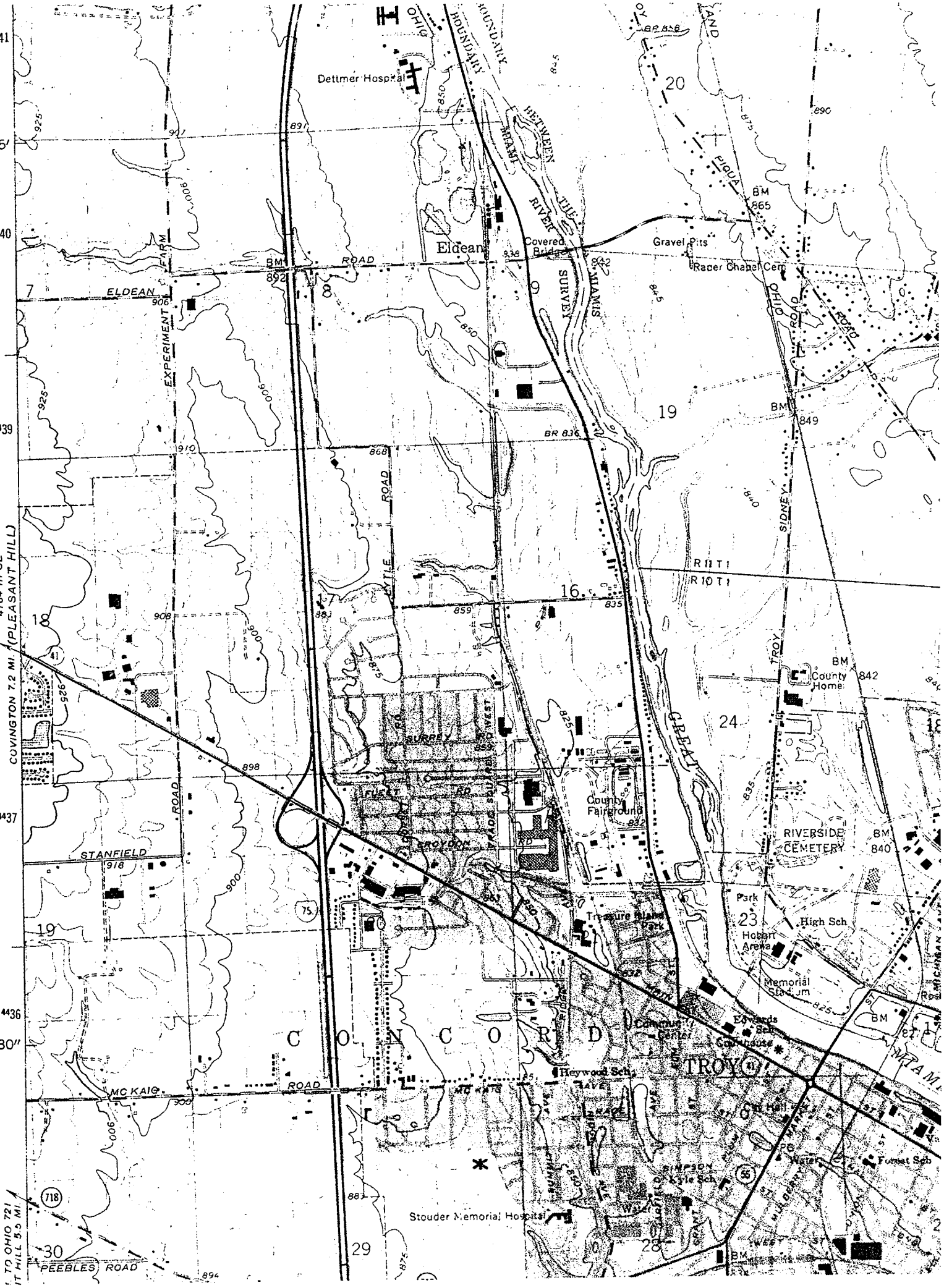
Minute Series [x] 7.5 [] 15 [] 30 [] 30x60

Year 1972 []Provisional Edition []Revised

[x]Photorevised []Inspected from 1961

Scale [x] 1:24,000 [] 1:25,000 [] 1:50,000

[] 1:62,500 [] 1:100,000 [] 1:125,000



Dettmer Hospital
Eldean
Covered Bridge
Gravel Pits
Raper Chapel Cem
ELDEAN ROAD
EXPERIMENT FARM
LYTLE ROAD
SURREY RD
FUEST RD
CROYDON RD
STANFIELD ROAD
MC KAIG ROAD
PEEBLES ROAD
County Fairground
Treasure Island Park
County Home
RIVERSIDE CEMETERY
High Sch
Hobart Arena
Memorial Stadium
Edwards Sch
Courthouse
Community Center
Heywood Sch
TROY
Stouder Memorial Hospital
Kyle Sch
Forest Sch
GREAT MIAMI RIVER
SIDNEY ROAD
TROY
PIQUA
OHIO
BOUNDARY
BETWEEN THE MIAMIS
SURVEY
R 11 T 1
R 10 T 1
COVINGTON 7.2 MI.
4164 III SE (PLEASANT HILL)
TO OHIO 721
IT HILL 5.5 MI.
C O N C O R D

Inquiry Number: 779029-5

TP Quad [✓] Adj Quad [] ↑N

Quad Troy

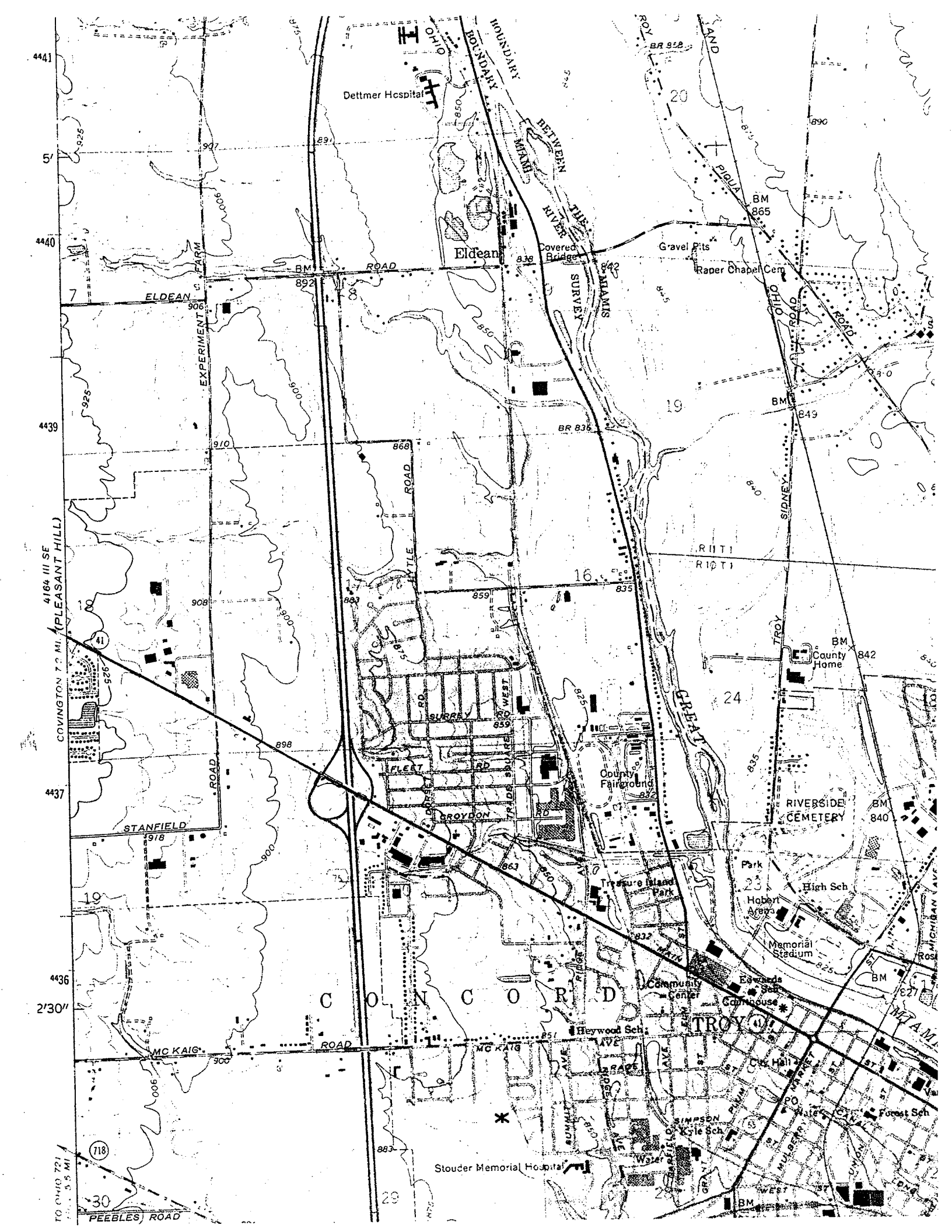
Minute Series [✓] 7.5 [] 15 [] 30 [] 30x60

Year 1982 []Provisional Edition []Revised

[✓]Photorevised []Inspected from 1961

Scale [✓] 1:24,000 [] 1:25,000 [] 1:50,000

[] 1:62,500 [] 1:100,000 [] 1:125,000



Dettmer Hospital
OHIO BOUNDARY
BOUNDARY
BETWEEN THE MIAMI RIVER SURVEY
MIAMIS
Eldean
Covered Bridge
Gravel Pits
Raper Chapel Cem
PIQUA
ROAD
ELDEAN
EXPERIMENT FARM
LYTLE ROAD
SIDNEY
TROY
County Home
GREAT
County Fairground
RIVERSIDE CEMETERY
Park
High Sch
Hobert Arena
Memorial Stadium
Treasure Island Park
Community Center
Edwards Sch
Courthouse
TROY
Heywood Sch
City Hall
Forest Sch
Kyle Sch
Stouder Memorial Hospital
MC KAIG ROAD
STANFIELD
SURREY RD
FLEET RD
CROYDON RD
TRADE SQUARE WEST
PEEBLES ROAD
COVINGTON 7.2 MI.
4164 III SE
(PLEASANT HILL)
C O N C O R D
4441
4440
4439
4437
4436
5'
2'30"

Inquiry Number: 729029-5

TP Quad [X] Adj Quad [] ↑N

Quad Troy

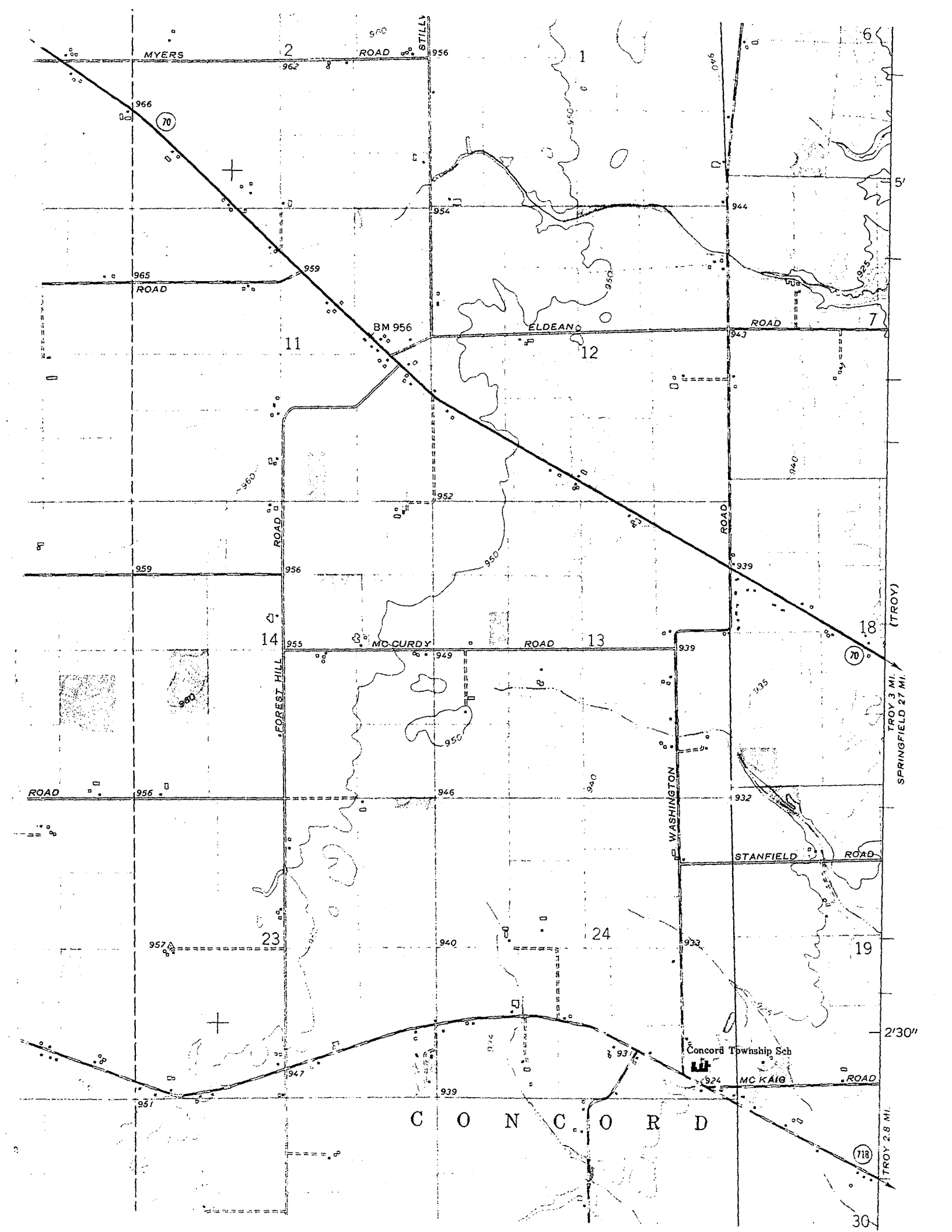
Minute Series [X] 7.5 [] 15 [] 30 [] 30x60

Year 1984 []Provisional Edition []Revised

[]Photorevised [X]Inspected from 1967

Scale [X] 1:24,000 [] 1:25,000 [] 1:50,000

[] 1:62,500 [] 1:100,000 [] 1:125,000


MYERS ROAD
STILLW
ROAD
BM 956
ELDEAN ROAD
FOREST HILL ROAD
MC CURDY ROAD
WASHINGTON ROAD
STANFIELD ROAD
MC KAIG ROAD
Concord Township Sch
C O N C O R D
TROY 3 MI.
SPRINGFIELD 27 MI.
(TROY)
TROY 2.8 MI.
5'
2'30"
1
2
6
7
11
12
13
14
18
19
23
24
30
70
718

Inquiry Number: 729029-5

TP Quad [] Adj Quad [X] ↑N

Quad Pleasant Hill

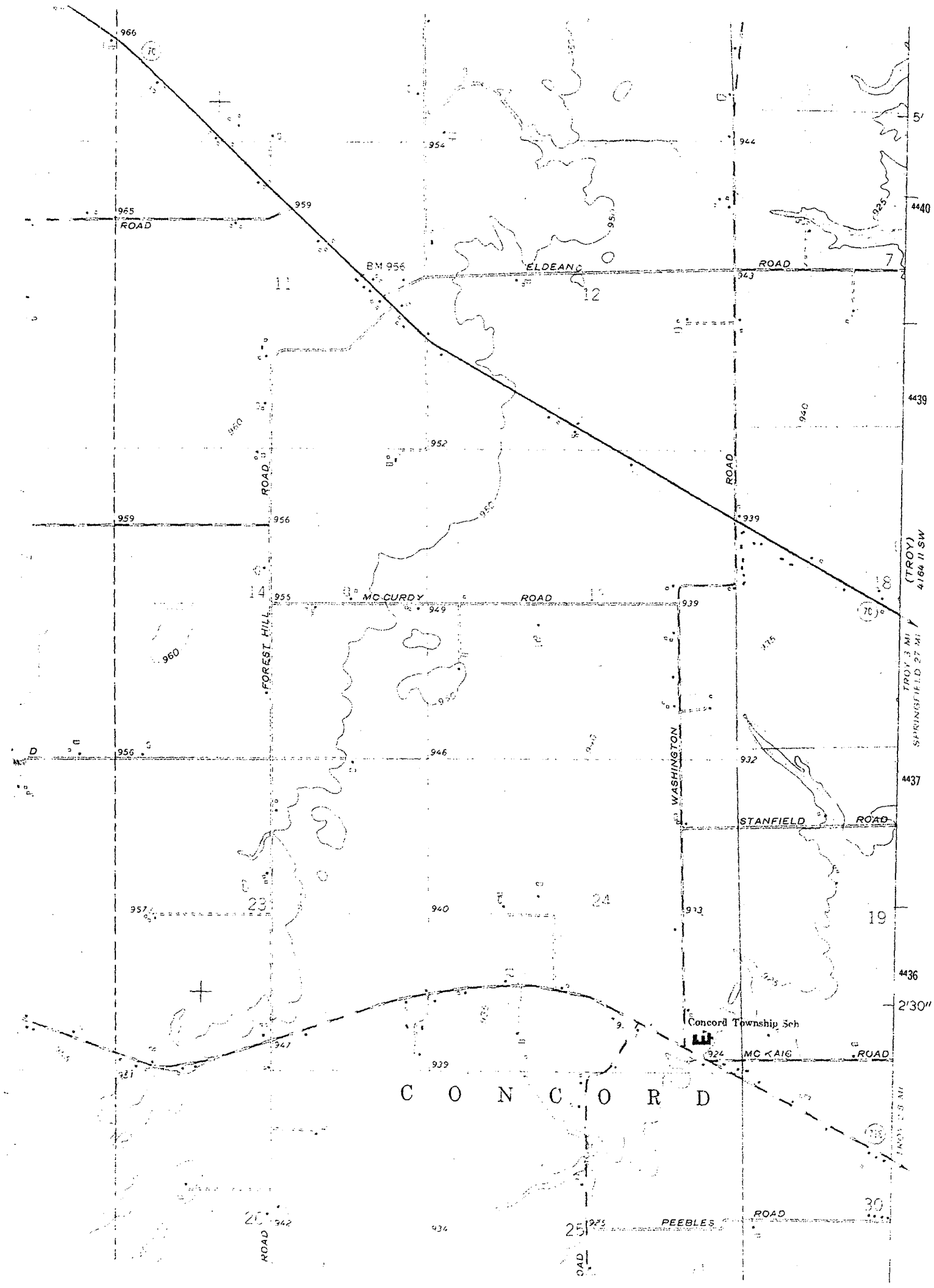
Minute Series [X] 7.5 [] 15 [] 30 [] 30x60

Year 1961 []Provisional Edition []Revised

[]Photorevised []Inspected from _____

Scale [X] 1:24,000 [] 1:25,000 [] 1:50,000

[] 1:62,500 [] 1:100,000 [] 1:125,000


ROAD
ELDEAN
ROAD
BM 956
MC CURDY
ROAD
FOREST HILL
ROAD
WASHINGTON
ROAD
STANFIELD
ROAD
Concord Township Sch
MC KAIG
ROAD
C O N C O R D
PEEBLES
ROAD
(TROY)
4164 II SW
TROY 3 MI
SPRINGFIELD 27 MI
4440
4439
4437
4436
2'30"

Inquiry Number: 729029-5

TP Quad [] Adj Quad [✓] ↑N

Quad Pleasant Hill

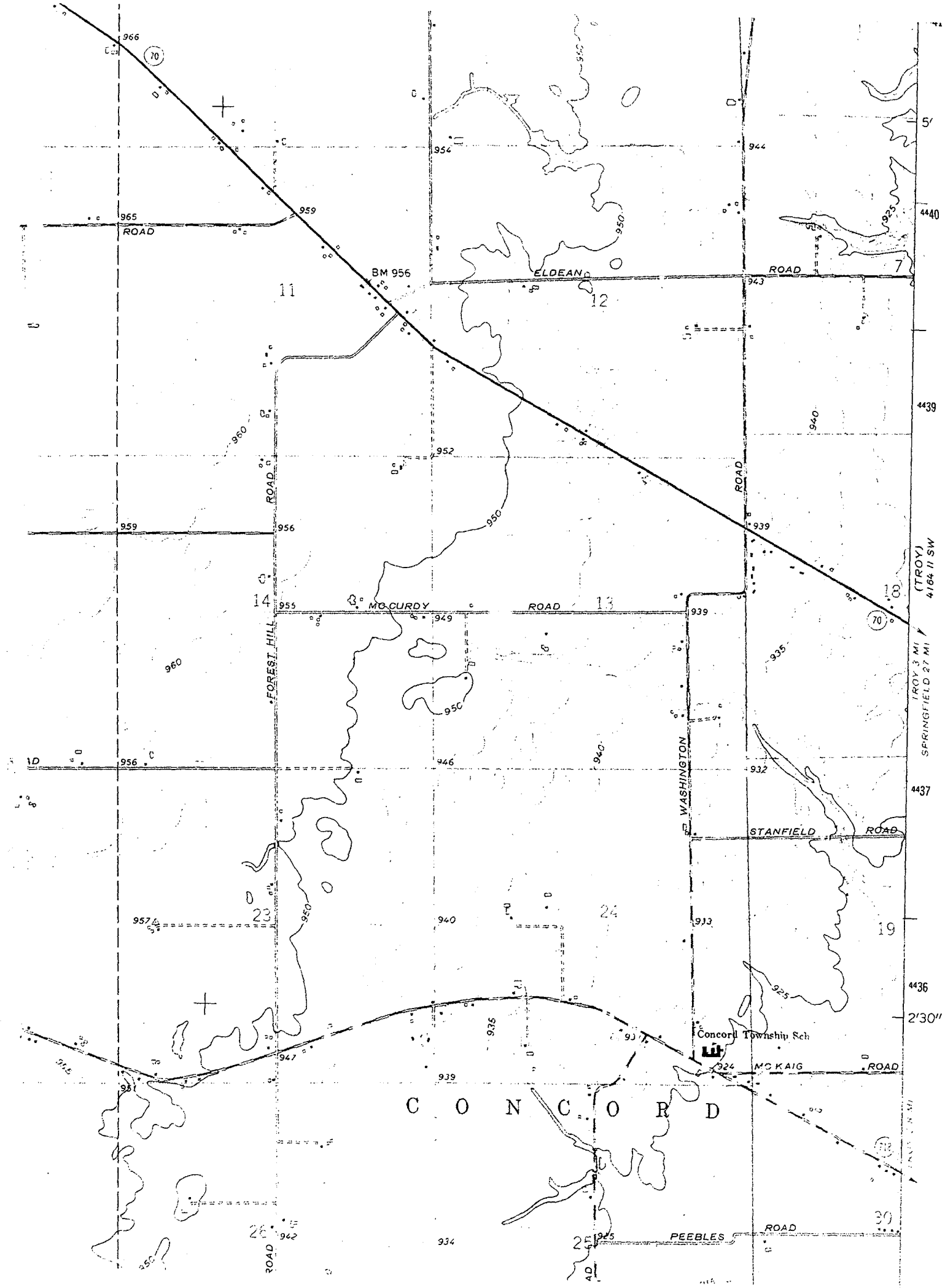
Minute Series [✓] 7.5 [] 15 [] 30 [] 30x60

Year 1973 []Provisional Edition []Revised

[]Photorevised [✓]Inspected from 1961

Scale [✓] 1:24,000 [] 1:25,000 [] 1:50,000

[] 1:62,500 [] 1:100,000 [] 1:125,000


ROAD
BM 956
ELDEAN
ROAD
MC CURDY
ROAD
FOREST HILL
ROAD
WASHINGTON
ROAD
STANFIELD
ROAD
Concord Township Sch
MC KAIG
ROAD
C O N C O R D
PEEBLES
ROAD
(TROY)
4164 II SW
TROY 3 MI
SPRINGFIELD 27 MI
4440
4439
4437
4436
2'30"
11
12
7
14
13
18
23
24
19
26
25
30

Inquiry Number: 729029-5

TP Quad [] Adj Quad [✓] ↑N

Quad Pleasant Hill

Minute Series [✓] 7.5 [] 15 [] 30 [] 30x60

Year 1983 []Provisional Edition []Revised

[]Photorevised [✓]Inspected from 1961

Scale [✓] 1:24,000 [] 1:25,000 [] 1:50,000

[] 1:62,500 [] 1:100,000 [] 1:125,000

The EDR-City Directory
Abstract

Spinnaker Coating
30 Mary Bill Drive
Troy, OH 45373

February 01, 2002

Inquiry Number: 729029-6

Environmental Data Resources, Inc.

The Source For Environmental Risk Management Data

3530 Post Road
Southport, Connecticut 06490

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802

Environmental Data Resources, Inc.
City Directory Abstract

Environmental Data Resources, Inc.'s (EDR) City Directory Abstract is a screening tool designed to assist professionals in evaluating potential liability on a target property resulting from past activities. ASTM E 1527-00, Section 7.3 on Historical Use Information, identifies the prior use requirements for a Phase I environmental site assessment. The ASTM standard requires a review of *reasonably ascertainable standard historical sources. Reasonably ascertainable means information that is publicly available, obtainable from a source with reasonable time and cost constraints, and practically reviewable.*

To meet the prior use requirements of ASTM E 1527-00, Section 7.3.4, the following *standard historical sources* may be used: aerial photographs, fire insurance maps, property tax files, land title records (although these cannot be the sole historical source consulted), topographic maps, city directories, building department records, or zoning/land use records. ASTM E 1527-00 requires *All obvious uses of the property shall be identified from the present, back to the property's obvious first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources as are necessary, and that are reasonably ascertainable and likely to be useful.* (ASTM E 1527-00,Section 7.3.4, page 12. EDR's City Directory Abstract includes a search and abstract of available city directory data.

City Directories
City directories have been published for cities and towns across the U.S. since the 1700s. Originally a list of residents, the city directory developed into a sophisticated tool for locating individuals and businesses in a particular urban or suburban area. Twentieth century directories are generally divided into three sections: a business index, a list of resident names and addresses, and a street index. With each address, the directory lists the name of the resident or, if a business is operated from this address, the name and type of business (if unclear from the name). While city directory coverage is comprehensive for major cities, it may be spotty for rural areas and small towns. ASTM E 1528-00 specifies that a *review of city directories (standard historical sources) at less than approximately five year intervals is not required by this practice. (ASTM E 1528-00, Section 7.3.4, page 12.)*

Please call EDR Nationwide Customer Service at
1-800-352-0050 (8am-8pm EST)
with questions or comments about your report.
Thank you for your business!

Disclaimer
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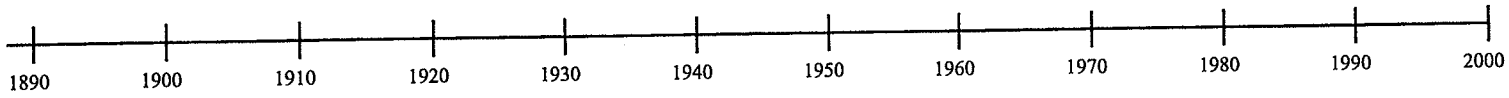
Environmental Data Resources, Inc.

Prior Use Report® Timeline

Target Property



Legend:

= Historical Topographic Map (**HT**)

= National Wetland Inventory Map (**WT**) *

= Flood Prone/FEMA Maps (**FP/FR**) *

= Aerial Photos Included (**P**) *

= Aerial Photos Available *

= Residential (**R**)

= Commercial or Industrial (**C**)

Superscript number corresponds to graph ID in text

**Displayed on timeline when aerial photos, flood prone, FEMA, wetland maps, or Aerial Research Summary are purchased.*

Target Property: Spinnaker Coating
Address: 30 Mary Bill Drive
City/State/Zip: Troy, OH 45373

Customer: ERM, Inc.
Contact: Leigh Sievert
Inquiry #: 729029-6
Date: 2/1/2002

4. SUMMARY

- *City Directories:*

Business directories including city, cross reference and telephone directories were reviewed, if available, at approximately five year intervals for the years spanning 1980 through 1999. (These years are not necessarily inclusive.) A summary of the information obtained is provided in the text of this report.

Date EDR Searched Historical Sources:
City Directories Feb 01, 2002

Target Property:
30 Mary Bill Drive
Troy, OH 45373

PUR ID Year	*Uses*	*Portion-Findings (FIM Information Only)*	*Source*
-- 1980	Address not Listed in Research Source		Haines Criss Cross Directory
-- 1985	Address not Listed in Research Source		Haines Criss Cross Directory
-- 1990	Address not Listed in Research Source		Haines Criss Cross Directory
-- 1995	Address not Listed in Research Source		Haines Criss Cross Directory
-- 1999	Address not Listed in Research Source		Haines Criss Cross Directory

Adjoining Properties

SURROUNDING
Multiple Addresses
Troy, OH 45373

PUR ID Year	*Uses*	*Portion-Findings (FIM Information Only)*	*Source*
1980	**Mary Bill Dr**		Haines Criss Cross Directory
	Address not listed in research source (15)		
	Raconex (20)		
	Address not listed in research source (33)		
	Liberty Tool (35)		
	Lefco Tool (35)		
	Stanley Auto (55)		
	-No other listings within range		
1985	**Mary Bill Dr**		Haines Criss Cross Directory
	Address not listed in research source (15)		
	Raconex (20)		
	Address not listed in research source (33)		
	Liberty Tool (35)		
	Lefco Tool (35)		
	Stanley Auto (55)		
	-No other listings within range		
1990	**Mary Bill Dr**		Haines Criss Cross Directory
	Datajam (15)		
	Raconex (20)		
	Address not listed in research source (33)		
	Liberty Tool (35)		
	Technacast (35)		

PUR ID Year	Uses	Portion-Findings (FIM Information Only)	Source
1990 (continued)			
	Ishmael Precision (55)		
	-No other listings within range		
1995	**Mary Bill Dr**		Haines Criss Cross Directory
	Jayna Inc (15)		
	Raconex (20)		
	No Return (33)		
	Liberty Tool (35)		
	Plastronic (35)		
	Ishmael Precision (55)		
	-No other listings within range		
1999	**Mary Bill Dr**		Haines Criss Cross Directory
	Jayna Inc (15)		
	Raconex (20)		
	No Return (33)		
	Liberty Tool (35)		
	Plastronic (35)		
	Ishmael Precision (55)		
	-No other listings within range		

Glossary of Terms

A.A.A.

Aerial photograph flyer: Agriculture Adjustment Administration (Federal).

A.S.C.S

Aerial photograph flyer: Agricultural Stabilization and Conservation Service (Federal)

Address in Research Source

Indicates that a property is listed at a different address than the one provided by the user. Generally occurs when a property is located on a corner or, when the physical address of a property is different than its mailing address.

Address Not Listed in Research Source

Occurs when a specific site address is not listed in city directories and/or fire insurance maps.

Adjoining

Any property that is contiguous, or a property that would be contiguous if not for a public thoroughfare, to the target property. *To differentiate from each adjoining property, stand at the target property's "front door" facing the street.*

Adjoining Back

Property directly to the rear of the target property. (Applies only to fire insurance map data.)

Adjoining Front

Property directly in front of the target property. (Applies only to fire insurance map data.)

Adjoining Left

Property directly to the left of the target property. (Applies only to fire insurance map data.)

Adjoining Right

Property directly to the right of the target property. (Applies only to fire insurance map data.)

Adjoining Surrounding Area

Property that may adjoin the target property but due to lack of specific map information cannot be located precisely. This situation typically occurs when city directory information, but not fire insurance map information, is available.

C.A.S

Aerial photograph flyer: Chicago Aerial Survey (private).

C.S.S.

Aerial photograph flyer: Commodity Stabilization Service (Federal).

Cartwright

Aerial photograph flyer: Cartwright (private)

CD

City Directory

Commercial

Any property including, but not limited to, property used for industrial, retail, office, agricultural, other commercial, medical, or educational purposes; property used for residential purposes that has more than four residential dwelling units.

Commercial or Industrial

Property that has either a commercial *or* an industrial use. Examples include retail stores, manufacturing facilities, factories, and apartment buildings.

D.N.R.

Aerial photograph flyer: Department of National Resources (state).

D.O.T.

Aerial photograph flyer: Department of Transportation (state).

Fairchild

Aerial photograph flyer: Fairchild (private).

FIM

Fire Insurance Map

Flood Insurance Rate Maps

Flood Insurance Rate Maps are produced by the Federal Emergency Management Agency (FEMA). These maps indicate special flood hazard areas, base flood elevations and flood insurance risk zones.

Flood Prone Area Maps

Flood Prone Area maps are produced by the United States Geological Survey (USGS). Areas identified as flood prone have been determined by available information gathered from past floods.

F.S.

Aerial photograph flyer: Forest Service (Federal).

Geonex

Aerial photograph flyer: Geonex (private).

M.C.

Aerial photograph flyer: Metropolitan Council of the Twin Cities Area (state).

Mark Hurd

Aerial photograph flyer: Mark Hurd (private)

N.A.P.P.

Aerial photograph flyer: National Aerial Photography Program (Federal).

National Wetland Inventory Maps

National Wetland Inventory Maps are produced by the U.S. Fish and Wildlife Service, a division of the U.S. Department of the Interior. Wetland and deepwater habitat information is identified on a 7.5 minute U.S.G.S. topographic map. The classification system used categorizes these habitats into five systems: marine, estuarine, riverine, lacustrine and palustrine.

No Return

Indicates that site owner was unavailable at time of surveyor's contact. *(Applies only to city directories.)*

No Structure Identified on Parcel

Used when site boundaries and/or site address is indicated on a fire insurance map; no structure details exist.

Other

Occurs when the site's classification is different that EDR's standard categories. Examples may include undeveloped land and buildings with no specified function.

P.M.A.

Aerial photograph flyer: Production and Marketing Administration (Federal).

Pacific Aerial

Aerial photograph flyer: Pacific Aerial (private)

Portion

Refers to the fire insurance map information identified on the four quadrants of a target or adjoining property. The portions are referred to as *Frontright*, *Frontleft*, *Backright*, and *Backleft* and are determined as if one were standing at the front door, facing the street.

Property Not Defined

Used when property is not clearly demarcated on a fire insurance map.

Residential

Any property having fewer than five dwelling units used exclusively for residential purposes.

Residential with Commercial Uses (a.k.a. Multiple Purpose Address)

A business (firm) and residence at the same address. Examples include a doctor, attorney, etc. working out of his/her home.

Sidwell

Aerial photograph flyer: Sidwell (private).

Site Not Mapped

Occurs when an adjoining property has not been mapped by fire insurance map surveyors. (Applies only to fire insuance map data.)

Teledyne

Aerial photograph flyer: Teledyne (private)

Topographic Maps

Topographic maps are produced by the United States Geological Survey (USGS). These maps are color coded line and symbol representations of natural and selected artificial features plotted to scale.

Turnbow

Aerial photograph flyer: Michael Turnbow (private)

U.S.D.A.
Aerial photograph flyer: United States Department of Agriculture (Federal).

U.S.D.I.
Aerial photograph flyer: United States Department of the Interior (Federal).

U.S.G.S.
Aerial photograph flyer: United States Geological Survey (Federal).

Vacant
May refer to an unoccupied structure or land. *Used only when fire insurance map or city directory specifies 'vacant.'*

W.P.A.
Aerial photograph flyer: Works Progress Administration (Federal).

WALLACE
Aerial photograph flyer: Wallace (private).

The EDR-Telephone Interview Report

Spinnaker Coating
30 Mary Bill Drive
Troy, OH 45373

February 4, 2002

Inquiry Number: 729029-8

Environmental Data Resources, Inc.

The Source For Environmental Risk Management Data

3530 Post Road
Southport, Connecticut 06490

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802

Environmental Data Resources, Inc.
Telephone Interviews

Environmental Data Resources, Inc.'s (EDR) Telephone Interviews is a screening tool designed to assist professionals in evaluating potential liability on a target property resulting from past activities. ASTM E 1527-00, Section 7.3 on Historical Use Information, identifies the prior use requirements for a Phase I environmental site assessment. The ASTM standard requires a review of *reasonably ascertainable standard historical sources. Reasonably ascertainable means information that is publicly available, obtainable from a source with reasonable time and cost constraints, and practically reviewable.*

To meet the prior use requirements of ASTM E 1527-00, Section 7.3.4, the following *standard historical sources* may be used: aerial photographs, fire insurance maps, property tax files, land title records (although these cannot be the sole historical source consulted), topographic maps, city directories, building department records, or zoning/land use records. ASTM E 1527-00 requires *"All obvious uses of the property shall be identified from the present, back to the property's obvious first developed use, or back to 1940, whichever is earlier. This task requires reviewing only as many of the standard historical sources as are necessary, and that are reasonably ascertainable and likely to be useful."* (ASTM E 1527-00, Section 7.3.4, page 12.)

The objective of telephone interviews is to obtain information about possible recognized environmental conditions. Telephone interviews are consistent with ASTM E 1527-00, Section 10. As stated in Section 10.5 *"A reasonable attempt shall be made to interview <u>at least one staff member of any one of the following types of local government</u> agencies: Local fire department that serves the property, local health agency or local agency or local/regional office of state health agency serving the area in which the property is located, or local agency or local/regional office of state health agency having jurisdiction over hazardous waste disposal or other environmental matters in the area in which the property is located...[i.e., State Agency Hazardous Waste Department (or equivalent)].* EDR's historical researchers will identify and contact the following local government officials (or their equivalent).

- Fire Department/Fire Marshal,
- Building/Plainning Department, or
- Health Department.

It should also be noted that *"While the person conducting the interview(s) has an obligation to ask questions, in many instances the persons to whom the questions are addressed will have no obligation to answer them. If the person conducting the interview(s) asks questions but does not receive answers or receives partial answers, this section shall not thereby be deemed incomplete, provided that questions have been asked (or attempted to be asked) in person or by telephone and written records have been kept of the person to whom the questions were addressed and their responses."* (ASTM E 1527-00, Section 10.5 and 10.8, page 16)

In the event a local government official is unavailable, EDR will place two followup phone calls and document all results. This process will help ensure timely report delivery.

Please call EDR Nationwide Customer Service at
1-800-352-0050 (8am-8pm EST)
with questions or comments about your report.
Thank you for your business!

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4. SUMMARY

- ***Telephone Interview:***

(Begins on the following page)

Interviews with Local Government Officials

Exceeds Requirements of ASTM E 1527-00, Section 10

Fire Department: Troy Fire Department

Date Called: 02/01/2002 Time: 9:40 a.m.

Name: Jim Bowell Title: Fire Inspector Phone: 937-335-5678

_ Referred to Another _ Answered Questions X Not Available

#1. To the best of your knowledge, are you aware of any releases of hazardous substances or petroleum products on or near the target property? **Not answered**

#2. To the best of your knowledge, are there now, or have there been in the past, any underground or above ground storage tanks located on the target property? **Not answered**

#3. To the best of your knowledge, what was the history of the property? Of the area?
Not answered

#4. Other information:

A message was left for Mr. Bowell to return the call as soon as possible with the requested information. A second call was made on 02/01/02 at 4:15 p.m. and a second message was left for Mr. Bowell to return the call as soon as possible with the requested information. A third and final call was made on 02/04/02 at 9:35 a.m. and final message was left for Mr. Bowell to return the call as soon as possible with the requested information.

A return call was received from Jim Bowell on February 4th. He stated that in 1978 a couple of underground storage tanks were installed to be used for fuel oil, and that the same tanks were pulled out in 1988. He said that except for false alarms, there were no fire runs on the property. The only other record Mr. Bowell had for the property was that a truck had backed into a fire hydrant, causing water to spray.

Civil/Public Works:

Date Called: 02/01/2002 Time: 4:48 pm

Name: _____ Title: _____ Phone: _____

_ Referred to Another _ Answered Questions _ Not Available

#1. To the best of your knowledge, is the target property listed on area's FEMA map as being in a flood plain? **Not answered**

What year flood plain? **Year**

Date of flood plain map: **12/30/1899**

Panel #:

#2. To the best of your knowledge, what was the history of the property? Of the area?

Not answered

#3. Other information:

Not answered

Planning Department: Troy Planning & Development Department

Date Called: 02/01/2002 Time: 4:10 p.m.

Name: Aloka Roy Title: Zoning Technician Phone: 937-339-9481

_ Referred to Another X Answered Questions _ Not Available

#1. To the best of your knowledge, what is the target property's current zoning?
Ms. Roy said the property is zoned M-2 Industrial.

Past Zoning?
Ms. Roy did not have this information available.

#2. To the best of your knowledge, what is the zoning of the surrounding neighborhood? **Industrial**

#3. To the best of your knowledge, how is the target property currently used? **Industrial**

#4. To the best of your knowledge, is the property served by a public or private water system, sewer or septic system?
Public Sewer

#5. To the best of your knowledge, what was the history of the property? Of the area?
Ms. Roy was not familiar with the history of the property and could not provide this information.

#6. Other information:
No other information was obtained from this contact.

Environmental Data Resources, Inc.

"Linking Technology with Tradition"

Sanborn® Map Report

Ship to: Leigh Sievert
ERM, Inc.
355 East Campus View
Columbus, OH 43235

1181019SXM 614-433-7900

Order Date: 1/30/2002 **Completion Date:** 01/31/2002
Inquiry #: 729029.4S
P.O. #: hr501.00.01
Site Name: Spinnaker Coating
Address: 30 Mary Bill Drive
City/State: Troy, OH 45373
Cross Streets:

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

NO COVERAGE

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Appendix G
EDR Database Search Results for Plant No. 1

The EDR Radius Map
with GeoCheck®

Spinnaker Coating
518 E. Water Street
Troy, OH 45373

Inquiry Number: 1729028.3p

January 30, 2002

Environmental Data Resources, Inc.

The Source For Environmental Risk Management Data

3530 Post Road
Southport, Connecticut 06490

Nationwide Customer Service

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

FORM-SXM

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Physical Setting Source Summary	A-2
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Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc. (EDR). The report meets the government records search requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-00. Search distances are per ASTM standard or custom distances requested by the user.

TARGET PROPERTY INFORMATION

ADDRESS

518 E. WATER STREET
TROY, OH 45373

COORDINATES

Latitude (North):	40.038900 - 40˚ 2' 20.0"
Longitude (West):	84.198400 - 84˚ 11' 54.2"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	739030.9
UTM Y (Meters):	4435625.5

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property:	2440084-A2 TROY, OH
Source:	USGS 7.5 min quad index

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following government records. For more information on this property see page 5 of the attached EDR Radius Map report:

Site	Database(s)	EPA ID
BROWN-BRIDGE PLANT #1 518 E WATER ST TROY, OH 45373	SHWS	N/A
BROWN-BRIDGE CORPORATION 518 E WATER ST TROY, OH 45373	FINDS RCRIS-LQG TRIS RCRIS-TSD CORRACTS DERR	45373KMBRL51
518 E WATER ST 518 E WATER ST TROY, OH 45373	ERNS	N/A
KIMBERLY-CLARK 518 EAST WATER STREET TROY, OH 45373	FINDS	000007355850
518 E WATER ST 518 E WATER ST TROY, OH	OH Spills	N/A
518 EAST WATER STREET EAST END OF PROPERTY 518 EAST WATER STREET EAST END OF PROPERTY TROY, OH 45373	ERNS	N/A

EXECUTIVE SUMMARY

518 E WATER ST
518 E WATER ST
TROY, OH

OH Spills N/A

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the ASTM E 1527-00 search radius around the target property for the following databases:

FEDERAL ASTM STANDARD

NPL..... National Priority List
Proposed NPL..... Proposed National Priority List Sites
CERCLIS..... Comprehensive Environmental Response, Compensation, and Liability Information System
CERC-NFRAP..... CERCLIS No Further Remedial Action Planned

STATE ASTM STANDARD

SWF/LF..... Licensed Solid Waste Facilities
UST..... Underground Storage Tank Tank File

FEDERAL ASTM SUPPLEMENTAL

CONSENT..... Superfund (CERCLA) Consent Decrees
ROD..... Records Of Decision
Delisted NPL..... National Priority List Deletions
HMIRS..... Hazardous Materials Information Reporting System
MLTS..... Material Licensing Tracking System
MINES..... Mines Master Index File
NPL Liens..... Federal Superfund Liens
PADS..... PCB Activity Database System
RAATS..... RCRA Administrative Action Tracking System
TSCA..... Toxic Substances Control Act
FTTS..... FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

Elevations have been determined from the USGS 1 degree Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. EDR's definition of a site with an elevation equal to the target property includes a tolerance of +/- 10 feet. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property (by more than 10 feet). Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

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

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

EXECUTIVE SUMMARY

FEDERAL ASTM STANDARD

RCRIS: The Resource Conservation and Recovery Act database includes selected information on sites that generate, store, treat, or dispose of hazardous waste as defined by the Act. The source of this database is the U.S. EPA.

A review of the RCRIS-SQG list, as provided by EDR, and dated 06/21/2000 has revealed that there are 3 RCRIS-SQG sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
HOBART CABINET CO	***301 E WATER ST***	***0 - 1/8 WNW***	***8***	***8***
WALTZS CLEANERS	***432 E MAIN ST***	***0 - 1/8 WSW***	***9***	***8***
SPEEDWAY 1030	***801 N MAIN ST***	***1/8 - 1/4 SE***	***11***	***9***

STATE ASTM STANDARD

SHWS: The State Hazardous Waste Sites records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. The data come from the Ohio Environmental Protection Agency's Master Sites List.

A review of the SHWS list, as provided by EDR, has revealed that there are 6 SHWS sites within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
TROY WELL FIELD / UNK SOURCE	***300 E STAUNTON RD***	***1/4 - 1/2 NNE***	***15***	***11***
TROY RAILROAD DEPOT	***EAST WEST ST***	***1/2 - 1 SSW***	***B22***	***13***
IVEX CORP	421 UNION ST	1/2 - 1 SSW	23	14
HOBART CORP TROY SUNSHADE CO D	***750 LINCOLN AVE***	***1/2 - 1 WSW***	***24***	***14***
HOBART BROS CO	***BTWN 439 / 507 N ELM***	***1/2 - 1 NW***	***26***	***15***
WAMPLER BUICK-GMC INC.	***507 N ELM ST***	***1/2 - 1 NW***	***27***	***15***

LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Commerce Division of State Fire Marshal's List of Reported Petroleum Underground Storage Tank Release Incidents.

A review of the LUST list, as provided by EDR, and dated 12/16/2001 has revealed that there are 10 LUST sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
ERWIN CHRYSLER-PLYMOUTH DODGE,	120 E MAIN ST	1/8 - 1/4 W	10	9
VERIZON NORTH, INC.	***17-19 S MARKET***	***1/4 - 1/2 W***	***12***	***10***
COUNTRY JUNCTION	229 S MULBERRY ST	1/4 - 1/2 WSW	13	10
ACTION GBW, INC.	***201 E STAUNTON RD***	***1/4 - 1/2 NNE***	***14***	***10***
TROY FIRE DEPT	18 E CANAL ST	1/4 - 1/2 WSW	16	12
RIVER CORRIDOR OFFICE	209 W WATER ST	1/4 - 1/2 WNW	17	12
MIAMI SHORES GOLF COURSE	402 E STAUNTON RD	1/4 - 1/2 NE	18	12
FORMER AVEY SERVICE	430 S CRAWFORD	1/4 - 1/2 SSW	19	13
RAYS TUNE UP	15 N OXFORD	1/4 - 1/2 WNW	20	13

EXECUTIVE SUMMARY

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
JONES TRANSFER CO.	707 S CRAWFORD ST	1/4 - 1/2 SSW	B21	13

PROPRIETARY DATABASES

Former Manufactured Gas (Coal Gas) Sites:

The existence and location of Coal Gas sites is provided exclusively to EDR by Real Property Scan, Inc. Copyright 1993 Real Property Scan, Inc. For a technical description of the types of hazards which may be found at such sites, contact your EDR customer service representative

A review of the Coal Gas list, as provided by EDR, has revealed that there is 1 Coal Gas site within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
TROY GAS CO.	1318 CLAY STREET	1/2 - 1 SSW	25	15

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

Site Name	Database(s)
DYE MILL RD LANDFILL	SHWS, DERR
HOBART BROS METAL FILLER DUMP	SHWS, DERR
TROSTEL PARK LDFL UNION STREET LDFL	CERC-NFRAP
TROY RAILROAD SITE	CERC-NFRAP
MAXINE DAVIS	LUST
FORMER GAS STA	LUST
ODOT MAINTENANCE GARAGE	LUST
WAGNER PLUMBING & HEATING	LUST
CONCORD TWP GARAGE	LUST
ELIZABETH ELEM SCHOOL	LUST
TRUE NORTH # 809	UST
CITY TRANSFER AND STORAGE CO	RCRIS-SQG, FINDS

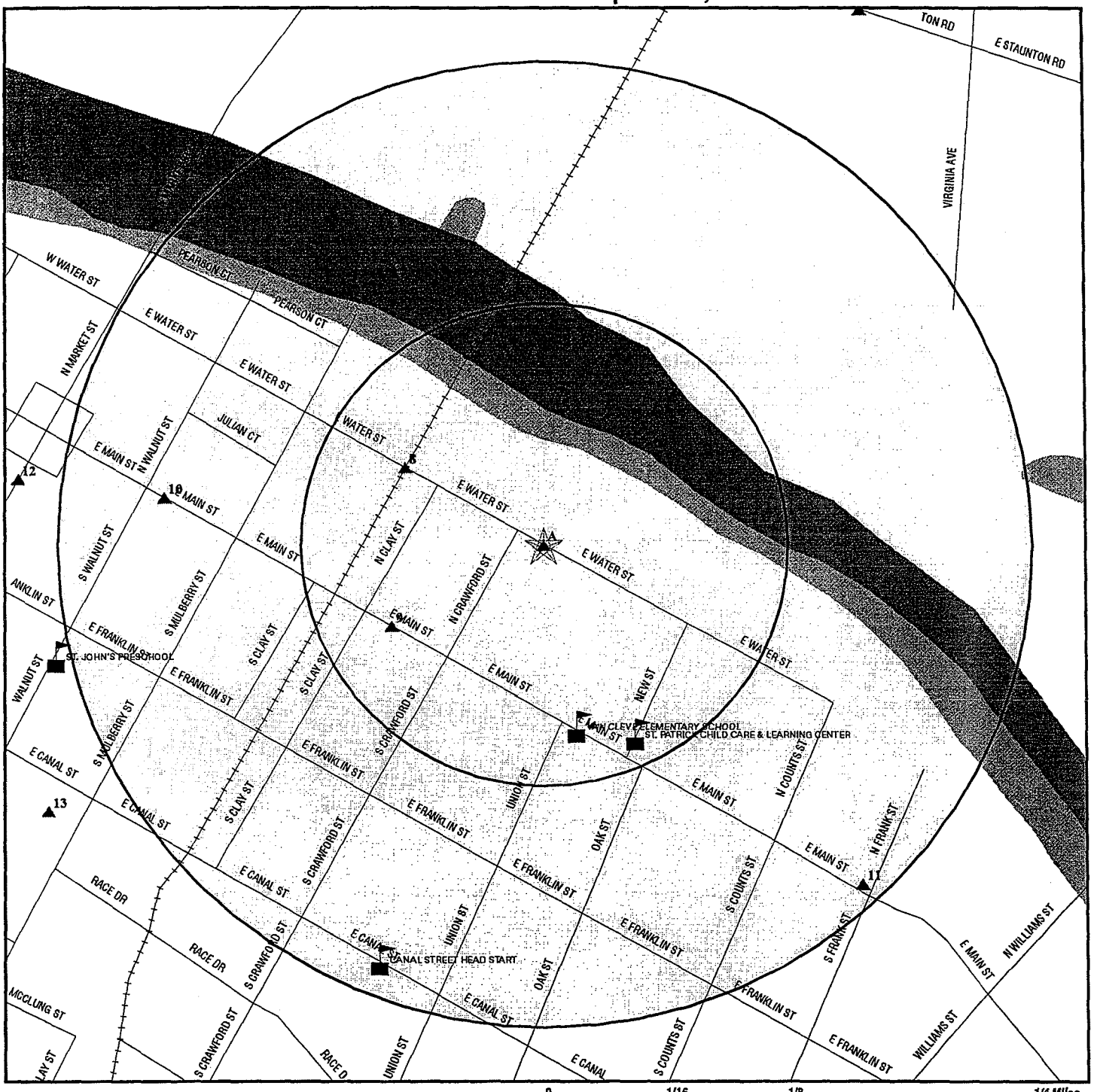
OVERVIEW MAP - 1729028.3p - ERM, Inc.

0 1/4 1/2 1 Miles

- ☆ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- Coal Gasification Sites
- National Priority List Sites
- Landfill Sites
- Power transmission lines
- Oil & Gas pipelines
- Wetlands

TARGET PROPERTY:	Spinnaker Coating	CUSTOMER:	ERM, Inc.
ADDRESS:	518 E. Water Street	CONTACT:	Leigh Anne Sievert
CITY/STATE/ZIP:	Troy OH 45373	INQUIRY #:	1729028.3p
LAT/LONG:	40.0389 / 84.1984	DATE:	January 30, 2002 12:51 pm

DETAIL MAP - 1729028.3p - ERM, Inc.



0 1/16 1/8 1/4 Miles

- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- Coal Gasification Sites
- Sensitive Receptors
- National Priority List Sites
- Landfill Sites
- Power transmission lines
- Oil & Gas pipelines
- Wetlands

TARGET PROPERTY:	Spinnaker Coating	CUSTOMER:	ERM, Inc.
ADDRESS:	518 E. Water Street	CONTACT:	Leigh Anne Sievert
CITY/STATE/ZIP:	Troy OH 45373	INQUIRY #:	1729028.3p
LAT/LONG:	40.0389 / 84.1984	DATE:	January 30, 2002 12:52 pm

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

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

Elapsed ASTM days: Provides confirmation that this EDR report meets or exceeds the 90-day updating requirement of the ASTM standard.

FEDERAL ASTM STANDARD RECORDS

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

Date of Government Version: 10/22/01
Date Made Active at EDR: 12/11/01
Database Release Frequency: Semi-Annually
Date of Data Arrival at EDR: 11/05/01
Elapsed ASTM days: 36
Date of Last EDR Contact: 11/05/01

NPL Site Boundaries

Sources:

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

EPA Region 1
Telephone 617-918-1143

EPA Region 3
Telephone 215-814-5418

EPA Region 4
Telephone 404-562-8033

EPA Region 6
Telephone: 214-655-6659

EPA Region 8
Telephone: 303-312-6774

Proposed NPL: Proposed National Priority List Sites
Source: EPA
Telephone: N/A

Date of Government Version: 10/22/01
Date Made Active at EDR: 12/11/01
Database Release Frequency: Semi-Annually
Date of Data Arrival at EDR: 11/05/01
Elapsed ASTM days: 36
Date of Last EDR Contact: 11/05/01

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System
Source: EPA
Telephone: 703-413-0223
CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 07/12/01
Date Made Active at EDR: 10/16/01
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 09/24/01
Elapsed ASTM days: 22
Date of Last EDR Contact: 12/26/01

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned
Source: EPA
Telephone: 703-413-0223
As of February 1995, CERCLIS sites designated "No Further Remedial Action Planned" (NFRAP) have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund action or NPL consideration. EPA has removed approximately 25,000 NFRAP sites to lift the unintended barriers to the redevelopment of these properties and has archived them as historical records so EPA does not needlessly repeat the investigations in the future. This policy change is part of the EPA's Brownfields Redevelopment Program to help cities, states, private investors and affected citizens to promote economic redevelopment of unproductive urban sites.

Date of Government Version: 07/12/01
Date Made Active at EDR: 10/16/01
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 09/24/01
Elapsed ASTM days: 22
Date of Last EDR Contact: 12/16/01

CORRACTS: Corrective Action Report
Source: EPA
Telephone: 800-424-9346
CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 11/14/01
Date Made Active at EDR: 01/14/02
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 11/14/01
Elapsed ASTM days: 61
Date of Last EDR Contact: 11/14/01

RCRIS: Resource Conservation and Recovery Information System
Source: EPA/NTIS
Telephone: 800-424-9346
Resource Conservation and Recovery Information System. RCRIS includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA).

Date of Government Version: 06/21/00
Date Made Active at EDR: 07/31/00
Database Release Frequency: Varies

Date of Data Arrival at EDR: 07/10/00
Elapsed ASTM days: 21
Date of Last EDR Contact: 11/07/01

ERNS: Emergency Response Notification System
Source: EPA/NTIS
Telephone: 202-260-2342
Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 08/08/00
Date Made Active at EDR: 09/06/00
Database Release Frequency: Varies

Date of Data Arrival at EDR: 08/11/00
Elapsed ASTM days: 26
Date of Last EDR Contact: 10/25/01

FEDERAL ASTM SUPPLEMENTAL RECORDS

BRS: Biennial Reporting System
Source: EPA/NTIS
Telephone: 800-424-9346
The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/99
Database Release Frequency: Biennially

Date of Last EDR Contact: 12/17/01
Date of Next Scheduled EDR Contact: 03/18/02

CONSENT: Superfund (CERCLA) Consent Decrees
Source: EPA Regional Offices
Telephone: Varies
Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: N/A
Database Release Frequency: Varies

Date of Last EDR Contact: N/A
Date of Next Scheduled EDR Contact: N/A

ROD: Records Of Decision
Source: NTIS
Telephone: 703-416-0223
Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 09/30/00
Database Release Frequency: Annually

Date of Last EDR Contact: 01/07/02
Date of Next Scheduled EDR Contact: 04/08/02

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

Date of Government Version: 11/13/01
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 11/05/01
Date of Next Scheduled EDR Contact: 02/04/02

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

Date of Government Version: 10/29/01
Database Release Frequency: Quarterly

Date of Last EDR Contact: 01/07/02
Date of Next Scheduled EDR Contact: 04/08/02

HMIRS: Hazardous Materials Information Reporting System
Source: U.S. Department of Transportation
Telephone: 202-366-4526
Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 05/31/01
Database Release Frequency: Annually

Date of Last EDR Contact: 10/22/01
Date of Next Scheduled EDR Contact: 01/21/02

MLTS: Material Licensing Tracking System
Source: Nuclear Regulatory Commission
Telephone: 301-415-7169
MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 10/25/01
Database Release Frequency: Quarterly

Date of Last EDR Contact: 01/07/02
Date of Next Scheduled EDR Contact: 04/08/02

MINES: Mines Master Index File
Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-5959

Date of Government Version: 08/24/01
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 01/02/02
Date of Next Scheduled EDR Contact: 04/01/02

NPL LIENS: Federal Superfund Liens
Source: EPA
Telephone: 205-564-4267
Federal Superfund Liens. Under the authority granted the USEPA by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner receives notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/91
Database Release Frequency: No Update Planned
Date of Last EDR Contact: 11/19/01
Date of Next Scheduled EDR Contact: 02/18/02

PADS: PCB Activity Database System
Source: EPA
Telephone: 202-260-3936
PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 09/30/01
Database Release Frequency: Annually
Date of Last EDR Contact: 11/13/01
Date of Next Scheduled EDR Contact: 02/12/02

RAATS: RCRA Administrative Action Tracking System
Source: EPA
Telephone: 202-564-4104
RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/95
Database Release Frequency: No Update Planned
Date of Last EDR Contact: 12/11/01
Date of Next Scheduled EDR Contact: 03/11/02

TRIS: Toxic Chemical Release Inventory System
Source: EPA
Telephone: 202-260-1531
Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/99
Database Release Frequency: Annually
Date of Last EDR Contact: 12/26/01
Date of Next Scheduled EDR Contact: 03/25/02

TSCA: Toxic Substances Control Act
Source: EPA
Telephone: 202-260-5521
Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/98
Database Release Frequency: Every 4 Years
Date of Last EDR Contact: 10/24/01
Date of Next Scheduled EDR Contact: 01/21/02

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-564-2501
FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 10/25/01
Database Release Frequency: Quarterly
Date of Last EDR Contact: 12/26/01
Date of Next Scheduled EDR Contact: 03/25/02

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
Source: EPA
Telephone: 202-564-2501

Date of Government Version: 10/25/01
Database Release Frequency: Quarterly
Date of Last EDR Contact: 12/26/01
Date of Next Scheduled EDR Contact: 03/25/02

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

STATE OF OHIO ASTM STANDARD RECORDS

SHWS: Master Sites List
Source: Ohio Environmental Protection Agency
Telephone: 614-644-2068
State Hazardous Waste Sites. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. Available information varies by state.

Date of Government Version: 03/01/99
Date Made Active at EDR: 04/21/99
Database Release Frequency: No Update Planned
Date of Data Arrival at EDR: 03/29/99
Elapsed ASTM days: 23
Date of Last EDR Contact: 12/11/01

SWF/LF: Licensed Solid Waste Facilities
Source: Ohio Environmental Protection Agency
Telephone: 614-644-2621
Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 11/01/01
Date Made Active at EDR: 11/28/01
Database Release Frequency: Annually
Date of Data Arrival at EDR: 11/15/01
Elapsed ASTM days: 13
Date of Last EDR Contact: 11/14/01

LUST: Leaking Underground Storage Tank File
Source: Department of Commerce
Telephone: 614-752-7924
Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 12/16/01
Date Made Active at EDR: 12/28/01
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 12/17/01
Elapsed ASTM days: 11
Date of Last EDR Contact: 12/17/01

UST: Underground Storage Tank Tank File
Source: Department of Commerce
Telephone: 614-752-7938
Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 12/16/01
Date Made Active at EDR: 12/28/01
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 12/17/01
Elapsed ASTM days: 11
Date of Last EDR Contact: 12/17/01

STATE OF OHIO ASTM SUPPLEMENTAL RECORDS

SPILLS: Emergency Response Database
Source: Ohio EPA
Telephone: 614-644-2084
All reported incidents, spills or releases to the environment.

Date of Government Version: 12/31/98
Database Release Frequency: Varies
Date of Last EDR Contact: 12/11/01
Date of Next Scheduled EDR Contact: 03/11/02

DERR: Division of Emergency & Remedial Response's Database
Source: Ohio EPA, Div. of Emergency Response
Telephone: 614-644-3538
Sites that may or may not have contamination.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 12/01/01
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 12/18/01
Date of Next Scheduled EDR Contact: 03/18/02

EDR PROPRIETARY HISTORICAL DATABASES

Former Manufactured Gas (Coal Gas) Sites: The existence and location of Coal Gas sites is provided exclusively to EDR by Real Property Scan, Inc. ©Copyright 1993 Real Property Scan, Inc. For a technical description of the types of hazards which may be found at such sites, contact your EDR customer service representative.

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The information contained in this report has predominantly been obtained from publicly available sources produced by entities other than Real Property Scan. While reasonable steps have been taken to insure the accuracy of this report, Real Property Scan does not guarantee the accuracy of this report. Any liability on the part of Real Property Scan is strictly limited to a refund of the amount paid. No claim is made for the actual existence of toxins at any site. This report does not constitute a legal opinion.

OTHER DATABASE(S)

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

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

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

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

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 1999 from the U.S. Fish and Wildlife Service.

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
FEDERAL ASTM STANDARD								
NPL		1.000	0	0	0	0	NR	0
Proposed NPL		1.000	0	0	0	0	NR	0
CERCLIS		0.500	0	0	0	NR	NR	0
CERC-NFRAP		0.250	0	0	NR	NR	NR	0
CORRACTS	X	1.000	0	0	0	0	NR	0
RCRIS-TSD	X	0.500	0	0	0	NR	NR	0
RCRIS Lg. Quan. Gen.	X	0.250	0	0	NR	NR	NR	0
RCRIS Sm. Quan. Gen.		0.250	2	1	NR	NR	NR	3
ERNS	X	TP	NR	NR	NR	NR	NR	0
STATE ASTM STANDARD								
State Haz. Waste	X	1.000	0	0	1	5	NR	6
State Landfill		0.500	0	0	0	NR	NR	0
LUST		0.500	0	1	9	NR	NR	10
UST		0.250	0	0	NR	NR	NR	0
FEDERAL ASTM SUPPLEMENTAL								
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	0	0	0	0	NR	0
Delisted NPL		1.000	0	0	0	0	NR	0
FINDS	X	TP	NR	NR	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
MINES		0.250	0	0	NR	NR	NR	0
NPL Liens		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
RAATS		TP	NR	NR	NR	NR	NR	0
TRIS	X	TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
STATE OR LOCAL ASTM SUPPLEMENTAL								
OH Spills	X	TP	NR	NR	NR	NR	NR	0
DERR	X	TP	NR	NR	NR	NR	NR	0
EDR PROPRIETARY HISTORICAL DATABASES								
Coal Gas		1.000	0	0	0	1	NR	1
AQUIFLOW - see EDR Physical Setting Source Addendum								

TP = Target Property

NR = Not Requested at this Search Distance

* Sites may be listed in more than one database

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
A1 Target Property	**BROWN-BRIDGE PLANT #1** **518 E WATER ST** **TROY, OH 45373**	**SHWS**	**S101396147** **N/A**

Site 1 of 7 in cluster A

SHWS:

Facility ID:	555-1490
EPA ID:	NOT ASSIGNED
Lat/Long:	40 02 22 / 84 11 58
Facility Type:	None

A2 Target Property	**BROWN-BRIDGE CORPORATION** **518 E WATER ST** **TROY, OH 45373**	**FINDS** **RCRIS-LQG** **TRIS** **RCRIS-TSD** **CORRACTS** **DERR**	**1000162875** **45373KMBRL51**

Site 2 of 7 in cluster A

CORRACTS Data:

EPA Id:	OHD088648282
Region:	5
State:	Not reported
Area Name:	ENTIRE FACILITY
Original Scheduled Date:	Not reported
New Scheduled Date:	Not reported
Actual Date:	09/29/1992
Corrective Action:	CA075LO - CA Prioritization, Facility or area was assigned a low corrective action priority

RCRIS:

Owner:	SPINNAKER INDUSTRIES INC (214) 855-0322
Contact:	MAURICE REYNOLDS (513) 339-0561
Record Date:	09/30/1993
Classification:	Large Quantity Generator, TSDF

BIENNIAL REPORTS:

Last Biennial Reporting Year: 1999

Waste	Quantity (Lbs)	Waste	Quantity (Lbs)
D001	2211.00	D039	43.00
F003	1804.00	F005	2201.00

Used Oil Recyc: No

TSDF Activities: Not reported

Violation Status: Violations exist

Regulation Violated:	Not reported
Area of Violation:	TSD-Closure/Post Closure Requirements
Date Violation Determined:	12/11/1989
Priority of Violation:	Low
Schedule Date to Achieve Compliance:	01/10/1990
Actual Date Achieved Compliance:	05/03/1990
Enforcement Action:	Written Informal
Enforcement Action Date:	12/11/1989
Proposed Monetary Penalty:	Not reported
Final Monetary Penalty:	Not reported
Regulation Violated:	Not reported
Area of Violation:	TSD-Other Requirements

BROWN-BRIDGE CORPORATION (Continued) **1000162875**

Date Violation Determined:	04/30/1991
Priority of Violation:	Low
Schedule Date to Achieve Compliance:	06/15/1991
Actual Date Achieved Compliance:	12/30/1991
Enforcement Action:	Written Informal
Enforcement Action Date:	05/08/1991
Proposed Monetary Penalty:	Not reported
Final Monetary Penalty:	Not reported
Regulation Violated:	Not reported
Area of Violation:	Generator-All Requirements
Date Violation Determined:	03/27/1998
Priority of Violation:	Low
Schedule Date to Achieve Compliance:	Not reported
Actual Date Achieved Compliance:	06/10/1998
Enforcement Action:	Written Informal
Enforcement Action Date:	03/30/1998
Proposed Monetary Penalty:	Not reported
Final Monetary Penalty:	Not reported

There are 3 violation record(s) reported at this site:

Evaluation	Area of Violation	Date of Compliance
Compliance Evaluation Inspection (CEI)	Generator-All Requirements	06/10/1998
Other Evaluation	TSD-Other Requirements	12/30/1991
Compliance Evaluation Inspection (CEI)	TSD-Other Requirements	12/30/1991
Other Evaluation	TSD-Closure/Post Closure Requirements	05/03/1990

FINDS:
Other Pertinent Environmental Activity Identified at Site:
AIRS Facility System (AIRS/AFS)
Biennial Reporting System (BRS)
Facility Registry System (FRS)
Ohio Core database (OH_CORE)
Permit Compliance System (PCS)
Resource Conservation and Recovery Act Information system (RCRAINFO)
Toxic Chemical Release Inventory System (TRIS)

DERR:
Facility Id: 555-1490
Lat/Long: 40 02 22 / 84 11 58
EPA ID: NOT ASSIGNED
Voluntary Action Program: False

A3 Target Property **518 E WATER ST**
518 E WATER ST
TROY, OH 45373

ERNS **94355803**
N/A

Site 3 of 7 in cluster A

A4 Target Property **KIMBERLY-CLARK**
518 EAST WATER STREET
TROY, OH 45373

FINDS **1004056585**
000007355850

Site 4 of 7 in cluster A

KIMBERLY-CLARK (Continued) **1004056585**

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Permit Compliance System (PCS)

A5 **OH Spills** **S103775844**
Target Property **518 E WATER ST** **N/A**
TROY, OH

Site 5 of 7 in cluster A

SPILLS:

Facility ID:	19980--2038		
Spill Date:	0/1998	Date Reported	05/22/98 15:34
Spill Number:	9800-00-2038		
Size of Spill:	Unknown	Priority:	Respond When Possible or Convenient
Cause:	Process Malfunction	Reason:	Undefined
Affected Area:	Air		
Material:	Not reported		
Type:	Chemicals prior to use in the use cycle, abandoned materials		
Units:	Not reported		
Waterway Affctd:	Not reported		
Spill Source:	Fixed Facility, Industry, Stack release - Air		
Reportable Qnty:	Not reported		

Name of Company or person that had spill: Not reported
Suspected Spiller:
SPINNAKER COATING
518 E WATER ST
TROY, OH 45373
Carrier: Not reported

A6 **518 EAST WATER STREET EAST END OF PROPERTY** **ERNS** **98438187**
Target Property **518 EAST WATER STREET EAST END OF PROPERTY** **N/A**
TROY, OH 45373

Site 6 of 7 in cluster A

A7 **OH Spills** **S103775592**
Target Property **518 E WATER ST** **N/A**
TROY, OH

Site 7 of 7 in cluster A

(Continued) **S103775592**

SPILLS:

Facility ID:	19980--2134		
Spill Date:	0/1998	Date Reported	05/28/98 16:20
Spill Number:	9800-00-2134		
Size of Spill:	Unknown	Priority:	No Response by Emergency Response
Cause:	Permit Violation	Reason:	Undefined
Affected Area:	Post-88 surface water		
Material:	Not reported		
Type:	Waste Water ie: noncontact cooling water, service water		
Units:	Not reported		
Waterway Affctd:	GREAT MIAMI RIVER		
Spill Source:	Fixed Facility, Industry, Waste system		
Reportable Qnty:	Not reported		

Name of Company or person that had spill: Not reported

Suspected Spiller:
KIMBERLY CLARK CORP/ BROWN BRIDGE IN
518 E WATER ST
TROY, OH 45373

Carrier: Not reported

---

8 WNW < 1/8 431 Higher | **HOBART CABINET CO** | **301 E WATER ST** | **TROY, OH 45373** | **RCRIS-SQG** | **1000156247** | **FINDS** | **OHD004268520**

RCRIS:

Owner: HOBART CABINET CO
(312) 555-1212

Contact: EDWARD HOBART
(513) 335-4666

Record Date: 03/19/1986
Classification: Small Quantity Generator
Used Oil Recyc: No

Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
- Facility Registry System (FRS)
- Ohio Core database (OH_CORE)
- Resource Conservation and Recovery Act Information system (RCRAINFO)

---

9 WSW < 1/8 470 Higher | **WALTZS CLEANERS** | **432 E MAIN ST** | **TROY, OH 45373** | **RCRIS-SQG** | **1000423854** | **FINDS** | **OHD981198765**

WALTZS CLEANERS (Continued) **1000423854**

RCRIS:
Owner: BROCK ANNA
(312) 555-1212

Contact: ANNA BROCK
(513) 339-4015

Record Date: 05/06/1986
Classification: Small Quantity Generator
Used Oil Recyc: No

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Resource Conservation and Recovery Act Information system (RCRAINFO)

---

10 West 1/8-1/4 1038 Higher | **ERWIN CHRYSLER-PLYMOUTH DODGE, I**
120 E MAIN ST
TROY, OH 45373 | **LUST** | **S104269054**
N/A

LUST:
Owner: ERWIN CHRYSLER-PLYMOUTH DODGE, I
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 55003275-N00001
Owner Address: PO BOX 339
TROY, OH 45373
FR Status: No Further Action letter issued
Old Facility Id: 553275
Former Lust Release Number: 553018500

---

11 SE 1/8-1/4 1264 Higher | **SPEEDWAY 1030**
801 N MAIN ST
TROY, OH 45373 | **RCRIS-SQG** | **1000467071**
FINDS | **OHD987002722**

RCRIS:
Owner: SPEEDWAY/SUPERAMERICA
(937) 322-1873

Contact: COORD ENVIRONMENTAL
(513) 323-1192

Record Date: 12/03/1997
Classification: Conditionally Exempt Small Quantity Generator
Used Oil Recyc: No

Violation Status: No violations found

SPEEDWAY 1030 (Continued) **1000467071**

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Ohio Core database (OH_CORE)
Resource Conservation and Recovery Act Information system (RCRAINFO)

---

12 West 1/4-1/2 1440 Higher

VERIZON NORTH, INC.
17-19 S MARKET
TROY, OH 45373

UST U003749478
LUST N/A

LUST:
Owner: VERIZON NORTH INC
Facility Status: Inactive
LTF Status: 1 SUS/CON from regulated UST
Release Number: 55007126-N00001
Owner Address: 19845 N US 31;MC:INAAAHE
WESTFIELD, IN 46074
FR Status: No Further Action letter issued
Old Facility Id: 557126
Former Lust Release Number: 556003100

UST:
Facility ID: 55007126 Tank ID: T00002
Owner: VERIZON NORTH INC
Owner Address: 19845 N US 31;MC:INAAAHE
WESTFIELD, IN 46074
Capacity: 0 Tank Status: CIU
Install Date: 01/01/1996
Content: Not reported
Tank Type: Not reported

---

13 WSW 1/4-1/2 1529 Higher

COUNTRY JUNCTION
229 S MULBERRY ST
TROY, OH 45373

LUST S104269043
N/A

LUST:
Owner: COUNTRY JUNCTION
Facility Status: Active
LTF Status: 6 Closure of regulated UST
Release Number: 55010036-N00001
Owner Address: 229 S MULBERRY ST
TROY, OH 45373
FR Status: Deficiency response recieved and has not been reviewed
Old Facility Id: 0
Former Lust Release Number: 551271300

---

14 NNE 1/4-1/2 1670 Higher

ACTION GBW, INC.
201 E STAUNTON RD
TROY, OH 45373

UST U002038657
LUST N/A

ACTION GBW, INC. (Continued) **U002038657**

LUST:
Owner: KEVIN ACCUSSO
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 55002314-N00001
Owner Address: 201 E STAUNTON RD
TROY, OH 45373
FR Status: No Further Action letter issued
Old Facility Id: 552314
Former Lust Release Number: 554182300

UST:

Facility ID:	55002314	Tank ID:	T00001
Owner:	ACTION GBW, INC.		
Owner Address:	201 E STAUNTON RD TROY, OH 45373		
Capacity:	6000	Tank Status:	CIU
Install Date:	10/01/1994		
Content:	Kerosene		
Tank Type:	Fiberglass Reinforced Plastic		
Facility ID:	55002314	Tank ID:	T00002
Owner:	ACTION GBW, INC.		
Owner Address:	201 E STAUNTON RD TROY, OH 45373		
Capacity:	6000	Tank Status:	CIU
Install Date:	10/01/1994		
Content:	Diesel		
Tank Type:	Fiberglass Reinforced Plastic		
Facility ID:	55002314	Tank ID:	T00003
Owner:	ACTION GBW, INC.		
Owner Address:	201 E STAUNTON RD TROY, OH 45373		
Capacity:	12000	Tank Status:	CIU
Install Date:	10/01/1994		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic		
Facility ID:	55002314	Tank ID:	T00004
Owner:	ACTION GBW, INC.		
Owner Address:	201 E STAUNTON RD TROY, OH 45373		
Capacity:	8000	Tank Status:	CIU
Install Date:	10/01/1994		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic		

---

15 NNE 1/4-1/2 1697 Higher **TROY WELL FIELD / UNK SOURCE**
300 E STAUNTON RD
TROY, OH 45373

SHWS S103686367
DERR N/A

SHWS:
Facility ID: 555-1353
EPA ID: NOT ASSIGNED
Lat/Long: 40 02 55 / 84 12 25
Facility Type: Contaminated Public Water Supply

TROY WELL FIELD / UNK SOURCE (Continued) **S103686367**

DERR:
Facility Id: 555-1353
Lat/Long: 40 02 55 / 84 12 25
EPA ID: OHSFN0507962
Voluntary Action Program: False

16
WSW
1/4-1/2
1761
Higher

TROY FIRE DEPT
18 E CANAL ST
TROY, OH 45373

LUST **S104257485**
N/A

LUST:
Owner: TROY FIRE DEPT
Facility Status: Inactive
LTF Status: 1 SUS/CON from regulated UST
Release Number: 55010007-N00001
Owner Address: 18 E CANAL ST
TROY, OH 45373
FR Status: No Further Action letter issued
Old Facility Id: 0
Former Lust Release Number: 550089700

17
WNW
1/4-1/2
1937
Higher

RIVER CORRIDOR OFFICE
209 W WATER ST
TROY, OH 45373

LUST **S104269051**
N/A

LUST:
Owner: RIVER CORRIDOR OFFICE
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 55010042-N00001
Owner Address: 209 W WATER ST
TROY, OH 45373
FR Status: No Further Action letter issued
Old Facility Id: 0
Former Lust Release Number: 552223300

18
NE
1/4-1/2
1955
Higher

MIAMI SHORES GOLF COURSE
402 E STAUNTON RD
TROY, OH 45373

LUST **S104257470**
N/A

LUST:
Owner: MIAMI SHORES GOLF COURSE
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 55009994-N00001
Owner Address: 402 E STAUNTON RD
TROY, OH 45373
FR Status: No Further Action letter issued
Old Facility Id: 0
Former Lust Release Number: 550012300

Map ID Direction Distance Distance (ft.) Elevation	Site	Database(s)	EDR ID Number EPA ID Number
19 SSW 1/4-1/2 2191 Higher	**FORMER AVEY SERVICE 430 S CRAWFORD TROY, OH 45373**	**LUST**	**S104257455 N/A**

LUST:
Owner: FORMER AVEY SERVICE
Facility Status: Active
LTF Status: 6 Closure of regulated UST
Release Number: 55010078-N00001
Owner Address: 430 S CRAWFORD
TROY, OH 45373
FR Status: A possible incident is reported
Old Facility Id: 0
Former Lust Release Number: 55939400

---

20 WNW 1/4-1/2 2549 Higher	**RAYS TUNE UP 15 N OXFORD TROY, OH 45373**	**LUST**	**S104257465 N/A**

LUST:
Owner: RAYS TUNE UP
Facility Status: Inactive
LTF Status: 1 SUS/CON from regulated UST
Release Number: 55010084-N00001
Owner Address: 15 N OXFORD
TROY, OH 45373
FR Status: No Further Action letter issued
Old Facility Id: 0
Former Lust Release Number: 55993400

B21 SSW 1/4-1/2 2623 Higher	**JONES TRANSFER CO. 707 S CRAWFORD ST TROY, OH 45373 Site 1 of 2 in cluster B**	**LUST**	**S104778085 N/A**

LUST:
Owner: JONES TRANSFER CO.
Facility Status: Active
LTF Status: 6 Closure of regulated UST
Release Number: 55000006-N00001
Owner Address: 24901 NORTHWESTERN HWY STE 502
SOUTHFIELD, MI 48075
FR Status: No closure report received letter sent
Old Facility Id: 550006
Former Lust Release Number: 553201500

B22 SSW 1/2-1 2694 Higher	**TROY RAILROAD DEPOT EAST WEST ST TROY, OH 45373 Site 2 of 2 in cluster B**	**SHWS DERR**	**1000440665 N/A**

TROY RAILROAD DEPOT (Continued) **1000440665**

SHWS:
Facility ID: 555-0822
EPA ID: OHD981537574
Lat/Long: 40 01 52 / 84 12 05
Facility Type: None

DERR:
Facility Id: 555-0822
Lat/Long: 40 01 52 / 84 12 05
EPA ID: OHD981537574
Voluntary Action Program: False

---

23 SSW 1/2-1 3123 Higher

IVEX CORP
421 UNION ST
TROY, OH 45373

SHWS **S100779271**
N/A

SHWS:
Facility ID: 555-1242
EPA ID: NOT ASSIGNED
Lat/Long: 40 01 54 / 84 12 02
Facility Type: None

---

24 WSW 1/2-1 3897 Higher

HOBART CORP TROY SUNSHADE CO DIV
750 LINCOLN AVE
TROY, OH 45373

FINDS **1000156222**
RCRIS-LQG **OHD004474466**
CERC-NFRAP
SHWS
DERR

CERCLIS-NFRAP Classification Data:
Site Incident Category: Not reported
Non NPL Code: NFRAP
Ownership Status: Other
Federal Facility: Not a Federal Facility
NPL Status: Not on the NPL

CERCLIS-NFRAP Assessment History:
Assessment: DISCOVERY — Completed: 08/01/1980
Assessment: PRELIMINARY ASSESSMENT — Completed: 06/30/1987

RCRIS:
Owner: HOBART CORP
(937) 332-3000

Contact: JAMES CARLETON
(513) 335-7171

Record Date: 08/28/1998
Classification: Large Quantity Generator, Conditionally Exempt Small Quantity Generator, Hazardous Waste Transporter
Used Oil Recyc: No

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
AIRS Facility System (AIRS/AFS)
Facility Registry System (FRS)
Ohio Core database (OH_CORE)
Resource Conservation and Recovery Act Information system (RCRAINFO)

HOBART CORP TROY SUNSHADE CO DIV (Continued) **1000156222**

SHWS:
Facility ID: 555-0400
EPA ID: OHD004474466
Lat/Long: 40 02 00 / 84 12 40
Facility Type: None

DERR:
Facility Id: 555-0400
Lat/Long: 40 02 00 / 84 12 40
EPA ID: OHD004474466
Voluntary Action Program: False

---

25 SSW 1/2-1 4817 Higher

TROY GAS CO.
1318 CLAY STREET
TROY, OH 45373

Coal Gas **G000000885** **N/A**

COAL GAS SITE DESCRIPTION:
1887 Troy Gas Works is located on the southwest bank of the Great Miami River, o de of Clay Street, north of E. Water Street. Site is on the southeast side of t 1898, site is called Miami Valley Gas and Fule Co. 1905, not in operation. By tilling Co. is on site. By 193l, pump house is on site.

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26 NW 1/2-1 4864 Higher

HOBART BROS CO
BTWN 439 / 507 N ELM ST
TROY, OH 45373

SHWS **S100037511**
DERR **N/A**

SHWS:
Facility ID: 555-0450
EPA ID: OHD980612279
Lat/Long: 40 02 57 / 84 12 38
Facility Type: None

DERR:
Facility Id: 555-0450
Lat/Long: 40 02 57 / 84 12 38
EPA ID: OHD980612279
Voluntary Action Program: False

---

27 NW 1/2-1 5173 Higher

WAMPLER BUICK-GMC INC.
507 N ELM ST
TROY, OH 45373

SHWS **S100779272**
DERR **N/A**

SHWS:
Facility ID: 555-1407
EPA ID: NOT ASSIGNED
Lat/Long: 40 02 57 / 84 12 43
Facility Type: Contaminated Public Water Supply, Active

DERR:
Facility Id: 555-1407
Lat/Long: 40 02 57 / 84 12 43

WAMPLER BUICK-GMC INC. (Continued) **S100779272**

EPA ID: NOT ASSIGNED
Voluntary Action Program: False

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)	Facility ID
ALCONY	S104257540	MAXINE DAVIS	7997 RT 41	45373	LUST	
TROY	S104269025	FORMER GAS STA	SR 55 / SR 718	45373	LUST	
TROY	1000440859	CITY TRANSFER AND STORAGE CO	BIG FOUR RR AND CRAWFORD	45373	RCRIS-SQG, FINDS	
TROY	S103686363	DYE MILL RD LANDFILL	DYE MILL RD	45373	SHWS, DERR	555-0253
TROY	S101871559	HOBART BROS METAL FILLER DUMP	LYTLE RD	45373	SHWS, DERR	555-0390
TROY	S104778121	ODOT MAINTENANCE GARAGE	2423 W MARKET ST SR 55	45373	LUST	
TROY	S104257479	WAGNER PLUMBING & HEATING	4007 W SR 718	45373	LUST	
TROY	S104257481	CONCORD TWP GARAGE	2678 W SR 718	45373	LUST	
TROY	U003749476	TRUE NORTH # 809	I-75 / ST.RT. 41 (A)	45373	UST	55000086
TROY	1003872396	TROSTEL PARK LDFL UNION STREET LDFL	SOUTH UNION STREET	45373	CERC-NFRAP	
TROY	S104257487	ELIZABETH ELEM SCHOOL	5760 E WALNUT GROVE RD	45373	LUST	
TROY	1003872403	TROY RAILROAD SITE	EAST WEST STREET	45373	CERC-NFRAP	

EPA Waste Codes Addendum

Code	Description
D001	IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.
D039	TETRACHLOROETHYLENE
F003	THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: XYLENE, ACETONE, ETHYL ACETATE, ETHYL BENZENE, ETHYL ETHER, METHYL ISOBUTYL KETONE, N-BUTYL ALCOHOL, CYCLOHEXANONE, AND METHANOL; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONLY THE ABOVE SPENT NON-HALOGENATED SOLVENTS; AND ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS, AND, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THOSE SOLVENTS LISTED IN F001, F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.
F005	THE FOLLOWING SPENT NON-HALOGENATED SOLVENTS: TOLUENE, METHYL ETHYL KETONE, CARBON DISULFIDE, ISOBUTANOL, PYRIDINE, BENZENE, 2-ETHOXYETHANOL, AND 2-NITROPROPANE; ALL SPENT SOLVENT MIXTURES/BLENDS CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE NON-HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F001, F002, OR F004; AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.

GEOCHECK®- PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

SPINNAKER COATING
518 E. WATER STREET
TROY, OH 45373

TARGET PROPERTY COORDINATES

Latitude (North):	40.038898 - 40˚ 2' 20.0"
Longitude (West):	84.198402 - 84˚ 11' 54.2"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	739030.9
UTM Y (Meters):	4435625.5

EDR's GeoCheck Physical Setting Source Addendum has been developed to assist the environmental professional with the collection of physical setting source information in accordance with ASTM 1527-00, Section 7.2.3. Section 7.2.3 requires that a current USGS 7.5 Minute Topographic Map (or equivalent, such as the USGS Digital Elevation Model) be reviewed. It also requires that one or more additional physical setting sources be sought when (1) conditions have been identified in which hazardous substances or petroleum products are likely to migrate to or from the property, and (2) more information than is provided in the current USGS 7.5 Minute Topographic Map (or equivalent) is generally obtained, pursuant to local good commercial or customary practice, to assess the impact of migration of recognized environmental conditions in connection with the property. Such additional physical setting sources generally include information about the topographic, hydrologic, hydrogeologic, and geologic characteristics of a site, and wells in the area.

Assessment of the impact of contaminant migration generally has two principle investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata. EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

USGS TOPOGRAPHIC MAP ASSOCIATED WITH THIS SITE

Target Property: 2440084-A2 TROY, OH
Source: USGS 7.5 min quad index

GENERAL TOPOGRAPHIC GRADIENT AT TARGET PROPERTY

Target Property: General East

Source: General Topographic Gradient has been determined from the USGS 1 Degree Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

Target Property County	FEMA Flood Electronic Data
MIAMI, OH	Not Available

Flood Plain Panel at Target Property: Not Reported

Additional Panels in search area: Not Reported

NATIONAL WETLAND INVENTORY

NWI Quad at Target Property	NWI Electronic Data Coverage
TROY	YES - refer to the Overview Map and Detail Map

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

AQUIFLOW®

Search Radius: 2.000 Miles.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

MAP ID	LOCATION FROM TP	GENERAL DIRECTION GROUNDWATER FLOW
Not Reported		

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

Era:	Paleozoic
System:	Ordovician
Series:	Upper Ordovician (Cincinnatian)
Code:	O3 *(decoded above as Era, System & Series)*

GEOLOGIC AGE IDENTIFICATION

Category: Stratified Sequence

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps. The following information is based on Soil Conservation Service STATSGO data.

Soil Component Name:	ELDEAN
Soil Surface Texture:	loam
Hydrologic Group:	Class B - Moderate infiltration rates. Deep and moderately deep, moderately well and well drained soils with moderately coarse textures.
Soil Drainage Class:	Well drained. Soils have intermediate water holding capacity. Depth to water table is more than 6 feet.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Hydric Status: Soil does not meet the requirements for a hydric soil.

Corrosion Potential - Uncoated Steel: HIGH

Depth to Bedrock Min: > 60 inches

Depth to Bedrock Max: > 60 inches

Soil Layer Information							
	Boundary			Classification			
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil	Permeability Rate (in/hr)	Soil Reaction (pH)
1	0 inches	12 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 2.00 Min: 0.60	Max: 7.30 Min: 5.60
2	12 inches	23 inches	clay	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 2.00 Min: 0.20	Max: 7.80 Min: 5.60
3	23 inches	30 inches	very gravelly - clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 2.00 Min: 0.60	Max: 8.40 Min: 6.60
4	30 inches	60 inches	stratified	Granular materials (35 pct. or less passing No. 200), Stone Fragments, Gravel and Sand.	COURSE-GRAINED SOILS, Gravels, Gravels with fines, Silty Gravel	Max: 20.00 Min: 6.00	Max: 8.40 Min: 7.40

OTHER SOIL TYPES IN AREA

Based on Soil Conservation Service STATSGO data, the following additional subordinant soil types may appear within the general area of target property.

Soil Surface Textures: clay loam
silt loam
silty clay loam

Surficial Soil Types: clay loam
silt loam
silty clay loam

Shallow Soil Types: silty clay loam
clay loam
silt loam
sandy clay loam

Deeper Soil Types: gravelly - coarse sand

sand and gravel
clay loam
loam

ADDITIONAL ENVIRONMENTAL RECORD SOURCES

According to ASTM E 1527-00, Section 7.2.2, "one or more additional state or local sources of environmental records may be checked, in the discretion of the environmental professional, to enhance and supplement federal and state sources... Factors to consider in determining which local or additional state records, if any, should be checked include (1) whether they are reasonably ascertainable, (2) whether they are sufficiently useful, accurate, and complete in light of the objective of the records review (see 7.1.1), and (3) whether they are obtained, pursuant to local, good commercial or customary practice." One of the record sources listed in Section 7.2.2 is water well information. Water well information can be used to assist the environmental professional in assessing sources that may impact groundwater flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

WELL SEARCH DISTANCE INFORMATION

DATABASE	SEARCH DISTANCE (miles)
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

FEDERAL USGS WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
A1	400221084114600	1/8 - 1/4 Mile East
A2	400221084114500	1/8 - 1/4 Mile East
A3	400222084114300	1/8 - 1/4 Mile ENE
A5	400217084113800	1/8 - 1/4 Mile ESE
B6	400213084113600	1/4 - 1/2 Mile ESE
B7	400208084112900	1/4 - 1/2 Mile ESE
9	400239084122000	1/2 - 1 Mile NW
10	400249084122800	1/2 - 1 Mile NW
12	400136084112300	1/2 - 1 Mile SSE

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
4	OH5531312	1/8 - 1/4 Mile West

Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

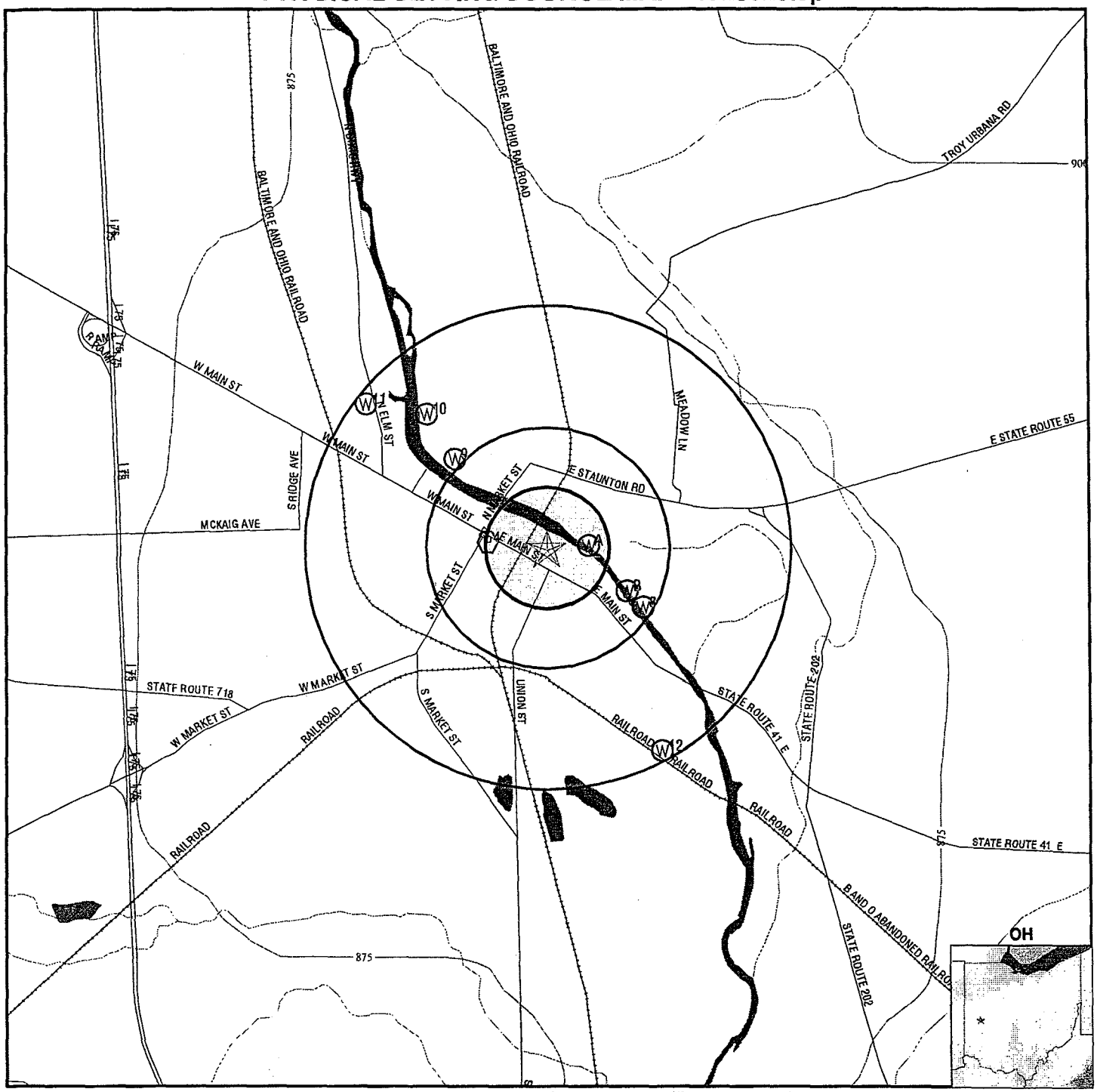
MAP ID	WELL ID	LOCATION FROM TP

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
8	5501612	1/4 - 1/2 Mile ESE
11	5502303	1/2 - 1 Mile NW

PHYSICAL SETTING SOURCE MAP - 1729028.3p



- Major Roads
- Contour Lines
- Water Wells
- Public Water Supply Wells
- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location
- Cluster of Multiple Icons
- Earthquake epicenter, Richter 5 or greater

TARGET PROPERTY:	Spinnaker Coating	CUSTOMER:	ERM, Inc.
ADDRESS:	518 E. Water Street	CONTACT:	Leigh Anne Sievert
CITY/STATE/ZIP:	Troy OH 45373	INQUIRY #:	1729028.3p
LAT/LONG:	40.0389 / 84.1984	DATE:	January 30, 2002 12:52 pm

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID Direction Distance Elevation	Database	EDR ID Number
A1 **East** **1/8 - 1/4 Mile** **Higher**	**FED USGS**	**400221084114600**

BASIC WELL DATA

Site Type:	Single well, other than collector or Ranney type		
Year Constructed:	1966	County:	Miami
Altitude:	824.00 ft.	State:	Ohio
Well Depth:	100.00 ft.	Topographic Setting:	Valley flat
Depth to Water Table:	12.00 ft.	Prim. Use of Site:	Test
Date Measured:	12011966	Prim. Use of Water:	Unused

A2 **East** **1/8 - 1/4 Mile** **Higher**	**FED USGS**	**400221084114500**

BASIC WELL DATA

Site Type:	Single well, other than collector or Ranney type		
Year Constructed:	1966	County:	Miami
Altitude:	825.00 ft.	State:	Ohio
Well Depth:	166.00 ft.	Topographic Setting:	Valley flat
Depth to Water Table:	12.00 ft.	Prim. Use of Site:	Test
Date Measured:	12011966	Prim. Use of Water:	Unused

A3 **ENE** **1/8 - 1/4 Mile** **Higher**	**FED USGS**	**400222084114300**

BASIC WELL DATA

Site Type:	Single well, other than collector or Ranney type		
Year Constructed:	1966	County:	Miami
Altitude:	825.00 ft.	State:	Ohio
Well Depth:	100.00 ft.	Topographic Setting:	Valley flat
Depth to Water Table:	6.00 ft.	Prim. Use of Site:	Test
Date Measured:	12011966	Prim. Use of Water:	Unused

4 **West** **1/8 - 1/4 Mile** **Higher**	**FRDS PWS**	**OH5531312**

PWS ID:	OH5531312	PWS Status:	Active
Date Initiated:	Not Reported	Date Deactivated:	Not Reported
PWS Name:	DOLPHIN SWIM CLUB MANAGER 2250 STATE ROUTE 718 TROY, OH 45373		
Addressee / Facility:	Not Reported		

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS

Facility Latitude:	40 02 21	Facility Longitude	084 12 11
City Served:	Not Reported		
Treatment Class:	Treated	Population:	300

PWS currently has or had major violation(s) or enforcement: Yes

Violations information not reported.

ENFORCEMENT INFORMATION:

System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Monitoring, Routine Major (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-04-01 - 1995-06-30	Analytical Value:	00000000.00
Violation ID:	9505217	Enforcement ID:	9504188
Enforcement Date:	1995-07-19	Enf. Action:	State Violation/Reminder Notice
System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Monitoring, Routine Major (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-04-01 - 1995-06-30	Analytical Value:	00000000.00
Violation ID:	9505217	Enforcement ID:	9504189
Enforcement Date:	1995-07-19	Enf. Action:	State Public Notif Requested
System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Monitoring, Routine Major (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1995-04-01 - 1995-06-30	Analytical Value:	00000000.00
Violation ID:	9505217	Enforcement ID:	9504190
Enforcement Date:	1995-07-20	Enf. Action:	State Public Notif Received
System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Max Contaminant Level, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-04-01 - 1998-06-30	Analytical Value:	0000000.000000000
Violation ID:	98040522	Enforcement ID:	98013272
Enforcement Date:	1998-06-01 S	Enf. Action:	FH
System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Max Contaminant Level, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-04-01 - 1998-06-30	Analytical Value:	0000000.000000000
Violation ID:	98040522	Enforcement ID:	98013273
Enforcement Date:	1998-06-01 S	Enf. Action:	IA
System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Max Contaminant Level, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-04-01 - 1998-06-30	Analytical Value:	0000000.000000000
Violation ID:	98040337	Enforcement ID:	98013270
Enforcement Date:	1998-06-01 S	Enf. Action:	IE
System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Max Contaminant Level, Acute (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-04-01 - 1998-06-30	Analytical Value:	0000000.000000000
Violation ID:	98040522	Enforcement ID:	98013271
Enforcement Date:	1998-06-24 S	Enf. Action:	IF

ENFORCEMENT INFORMATION:

System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Max Contaminant Level, Monthly (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-04-01 - 1998-06-30	Analytical Value:	0000000.000000000
Violation ID:	98040522	Enforcement ID:	98013273
Enforcement Date:	1998-06-01 S	Enf. Action:	IA
System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Max Contaminant Level, Monthly (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-04-01 - 1998-06-30	Analytical Value:	0000000.000000000
Violation ID:	98040338	Enforcement ID:	98013270
Enforcement Date:	1998-06-01 S	Enf. Action:	IE
System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Max Contaminant Level, Monthly (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-04-01 - 1998-06-30	Analytical Value:	0000000.000000000
Violation ID:	98040522	Enforcement ID:	98013271
Enforcement Date:	1998-06-24 S	Enf. Action:	IF
System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Monitoring, Routine Major (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-04-01 - 1998-06-30	Analytical Value:	0000000.000000000
Violation ID:	98040522	Enforcement ID:	98013684
Enforcement Date:	1998-08-04 S	Enf. Action:	IA
System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Monitoring, Routine Major (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-04-01 - 1998-06-30	Analytical Value:	0000000.000000000
Violation ID:	98040522	Enforcement ID:	98013685
Enforcement Date:	1998-08-04 S	Enf. Action:	IE
System Name:	DOLPHIN SWIM CLUB		
Violation Type:	Monitoring, Routine Major (TCR)		
Contaminant:	COLIFORM (TCR)		
Compliance Period:	1998-04-01 - 1998-06-30	Analytical Value:	0000000.000000000
Violation ID:	98040522	Enforcement ID:	98013686
Enforcement Date:	1998-08-20 S	Enf. Action:	IF

A5
ESE
1/8 - 1/4 Mile
Higher

FED USGS **400217084113800**

BASIC WELL DATA

Site Type:	Single well, other than collector or Ranney type		
Year Constructed:	1966	County:	Miami
Altitude:	821.00 ft.	State:	Ohio
Well Depth:	125.00 ft.	Topographic Setting:	Valley flat
Depth to Water Table:	10.00 ft.	Prim. Use of Site:	Test
Date Measured:	12011966	Prim. Use of Water:	Unused

GEOCHECK®- PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID Direction Distance Elevation	Database	EDR ID Number
B6 **ESE** **1/4 - 1/2 Mile** **Higher**	**FED USGS**	**400213084113600**

BASIC WELL DATA

Site Type:	Single well, other than collector or Ranney type		
Year Constructed:	1966	County:	Miami
Altitude:	828.00 ft.	State:	Ohio
Well Depth:	134.00 ft.	Topographic Setting:	Valley flat
Depth to Water Table:	14.00 ft.	Prim. Use of Site:	Test
Date Measured:	12011966	Prim. Use of Water:	Unused

B7 **ESE** **1/4 - 1/2 Mile** **Higher**	**FED USGS**	**400208084112900**

BASIC WELL DATA

Site Type:	Single well, other than collector or Ranney type		
Year Constructed:	1973	County:	Miami
Altitude:	820.00 ft.	State:	Ohio
Well Depth:	105.00 ft.	Topographic Setting:	Not Reported
Depth to Water Table:	Not Reported	Prim. Use of Site:	Withdrawal of water
Date Measured:	Not Reported	Prim. Use of Water:	Public supply

8 **ESE** **1/4 - 1/2 Mile** **Higher**	**OH WELLS**	**5501612**

PWS ID:	5501612	Population Served:	20,250
Latitude:	0400207	Longitude:	0841128
Owner:	TROY, CITY OF		
Source:	Ground		

9 **NW** **1/2 - 1 Mile** **Higher**	**FED USGS**	**400239084122000**

BASIC WELL DATA

Site Type:	Single well, other than collector or Ranney type		
Year Constructed:	1950	County:	Miami
Altitude:	825.00 ft.	State:	Ohio
Well Depth:	Not Reported	Topographic Setting:	Valley flat
Depth to Water Table:	Not Reported	Prim. Use of Site:	Withdrawal of water
Date Measured:	Not Reported	Prim. Use of Water:	Public supply

10 **NW** **1/2 - 1 Mile** **Higher**	**FED USGS**	**400249084122800**

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

BASIC WELL DATA

Site Type:	Single well, other than collector or Ranney type		
Year Constructed:	1962	County:	Miami
Altitude:	827.00 ft.	State:	Ohio
Well Depth:	177.00 ft.	Topographic Setting:	Valley flat
Depth to Water Table:	14.00 ft.	Prim. Use of Site:	Withdrawal of water
Date Measured:	10061962	Prim. Use of Water:	Public supply

11
NW
1/2 - 1 Mile
Higher

OH WELLS **5502303**

PWS ID:	5502303	Population Served:	120
Latitude:	0400251	Longitude:	0841245
Owner:	MIAMI CO-N25A EXTENSION		
Source:	Purchased Ground Water		

12
SSE
1/2 - 1 Mile
Higher

FED USGS **400136084112300**

BASIC WELL DATA

Site Type:	Single well, other than collector or Ranney type		
Year Constructed:	Not Reported	County:	Miami
Altitude:	824.00 ft.	State:	Ohio
Well Depth:	Not Reported	Topographic Setting:	Valley flat
Depth to Water Table:	Not Reported	Prim. Use of Site:	Withdrawal of water
Date Measured:	Not Reported	Prim. Use of Water:	Industrial

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS
RADON

AREA RADON INFORMATION

Federal EPA Radon Zone for MIAMI County: 1

Note: Zone 1 indoor average level > 4 pCi/L.
: Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
: Zone 3 indoor average level < 2 pCi/L.

Zip Code: 45373

Number of sites tested: 5

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	1.300 pCi/L	100%	0%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	8.280 pCi/L	20%	80%	0%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

HYDROLOGIC INFORMATION

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

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 1999 from the U.S. Fish and Wildlife Service.

HYDROGEOLOGIC INFORMATION

AQUIFLOW[R] Information System
Source: EDR proprietary database of groundwater flow information
EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit
Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database
The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the national Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

ADDITIONAL ENVIRONMENTAL RECORD SOURCES

FEDERAL WATER WELLS

PWS: Public Water Systems
Source: EPA/Office of Drinking Water
Telephone: 202-260-2805
Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data
Source: EPA/Office of Drinking Water
Telephone: 202-260-2805
Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: In November 1971 the United States Geological Survey (USGS) implemented a national water resource information tracking system. This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on more than 900,000 wells, springs, and other sources of groundwater.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STATE RECORDS

Ohio Public Water Systems
Source: Ohio EPA, Division of Drinking and Groundwater
Telephone: 614-644-2752

RADON

Area Radon Information: The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

EPA Radon Zones: Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Epicenters: World earthquake epicenters, Richter 5 or greater
Source: Department of Commerce, National Oceanic and Atmospheric Administration

Appendix H
EDR Database Search Results for Plant No. 2

The EDR Radius Map
with GeoCheck®

Spinnaker Coating
30 Mary Bill Drive
Troy, OH 45373

Inquiry Number: 1729029.3p

January 30, 2002

Environmental Data Resources, Inc.

The Source For Environmental Risk Management Data

3530 Post Road
Southport, Connecticut 06490

Nationwide Customer Service

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

FORM-SXM

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GEOCHECK ADDENDUM

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

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc. (EDR). The report meets the government records search requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-00. Search distances are per ASTM standard or custom distances requested by the user.

TARGET PROPERTY INFORMATION

ADDRESS

30 MARY BILL DRIVE
TROY, OH 45373

COORDINATES

Latitude (North):	40.059700 - 40˚ 3' 34.9"
Longitude (West):	84.244300 - 84˚ 14' 39.5"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	735042.7
UTM Y (Meters):	4437812.5

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property:	2440084-A2 TROY, OH
Source:	USGS 7.5 min quad index

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following government records. For more information on this property see page 5 of the attached EDR Radius Map report:

Site	Database(s)	EPA ID
SPINNAKER COATING 30 MARY BILL DR TROY, OH 45373	FINDS RCRIS-LQG	OHD980569263

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the ASTM E 1527-00 search radius around the target property for the following databases:

FEDERAL ASTM STANDARD

NPL..... National Priority List
Proposed NPL..... Proposed National Priority List Sites
CERCLIS..... Comprehensive Environmental Response, Compensation, and Liability Information System
CORRACTS..... Corrective Action Report
RCRIS-TSD..... Resource Conservation and Recovery Information System
ERNS..... Emergency Response Notification System

STATE ASTM STANDARD

SWF/LF..... Licensed Solid Waste Facilities

EXECUTIVE SUMMARY

FEDERAL ASTM SUPPLEMENTAL

CONSENT..... Superfund (CERCLA) Consent Decrees
ROD..... Records Of Decision
Delisted NPL..... National Priority List Deletions
HMIRS..... Hazardous Materials Information Reporting System
MLTS..... Material Licensing Tracking System
MINES..... Mines Master Index File
NPL Liens..... Federal Superfund Liens
PADS..... PCB Activity Database System
RAATS..... RCRA Administrative Action Tracking System
TRIS..... Toxic Chemical Release Inventory System
TSCA..... Toxic Substances Control Act
FTTS..... FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

STATE OR LOCAL ASTM SUPPLEMENTAL

OH Spills..... Emergency Response Database
DERR..... Division of Emergency & Remedial Response's Database

EDR PROPRIETARY HISTORICAL DATABASES

Coal Gas..... Former Manufactured Gas (Coal Gas) Sites

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

Elevations have been determined from the USGS 1 degree Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. EDR's definition of a site with an elevation equal to the target property includes a tolerance of +/- 10 feet. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property (by more than 10 feet). Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

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

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

FEDERAL ASTM STANDARD

CERCLIS-NFRAP: As of February 1995. CERCLIS sites designated "No Further Remedial Action Planned" (NFRAP) have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund Action or NPL consideration. EPA has removed approximately 25,000 NFRAP sites to lift the unintended barriers to the redevelopment of these properties and has archived them as historical records so EPA does not needlessly repeat the investigations in the future. This policy change is part of the EPA's Brownfields Redevelopment Program to help cities, states, private investors and affected citizens to promote economic redevelopment of unproductive urban sites.

A review of the CERC-NFRAP list, as provided by EDR, and dated 07/12/2001 has revealed that there is 1 CERC-NFRAP site within approximately 0.25 miles of the target property.

EXECUTIVE SUMMARY

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CHROMPARTS INC	*35 MARY BILL DR BLDG D*	*0 - 1/8 NNW*	*2*	*5*

RCRIS: The Resource Conservation and Recovery Act database includes selected information on sites that generate, store, treat, or dispose of hazardous waste as defined by the Act. The source of this database is the U.S. EPA.

A review of the RCRIS-SQG list, as provided by EDR, and dated 06/21/2000 has revealed that there are 5 RCRIS-SQG sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CHROMPARTS INC	*35 MARY BILL DR BLDG D*	*0 - 1/8 NNW*	*2*	*5*
DATAJAM CORP	*15 MARYBILL DR*	*0 - 1/8 S*	*3*	*6*
KIMBERLY CLARK CORP BROWN-BRID	MARYBILL DRIVE	1/8 - 1/4 S	4	6
TROY MAINTENANCE FACILITY CITY	*1400 EXPERIMENT FARM RD*	*1/8 - 1/4 E*	*5*	*7*
VEDO TROY	*1300 1300 EXPERIMENT FA*	*1/8 - 1/4 SE*	*6*	*8*

STATE ASTM STANDARD

SHWS: The State Hazardous Waste Sites records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. The data come from the Ohio Environmental Protection Agency's Master Sites List.

A review of the SHWS list, as provided by EDR, has revealed that there is 1 SHWS site within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CHROMPARTS INC	*35 MARY BILL DR BLDG D*	*0 - 1/8 NNW*	*2*	*5*

LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Commerce Division of State Fire Marshal's List of Reported Petroleum Underground Storage Tank Release Incidents.

A review of the LUST list, as provided by EDR, and dated 12/16/2001 has revealed that there are 2 LUST sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
FRIENDLY ICE CREAM CORP.	*1903 W MAIN ST*	*1/4 - 1/2 SE*	*A7*	*8*
SPEEDWAY #5298	*1894 W MAIN ST*	*1/4 - 1/2 SE*	*A8*	*9*

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Commerce Division of State Fire Marshal's Facility File.

A review of the UST list, as provided by EDR, and dated 12/16/2001 has revealed that there is 1 UST site within approximately 0.25 miles of the target property.

EXECUTIVE SUMMARY

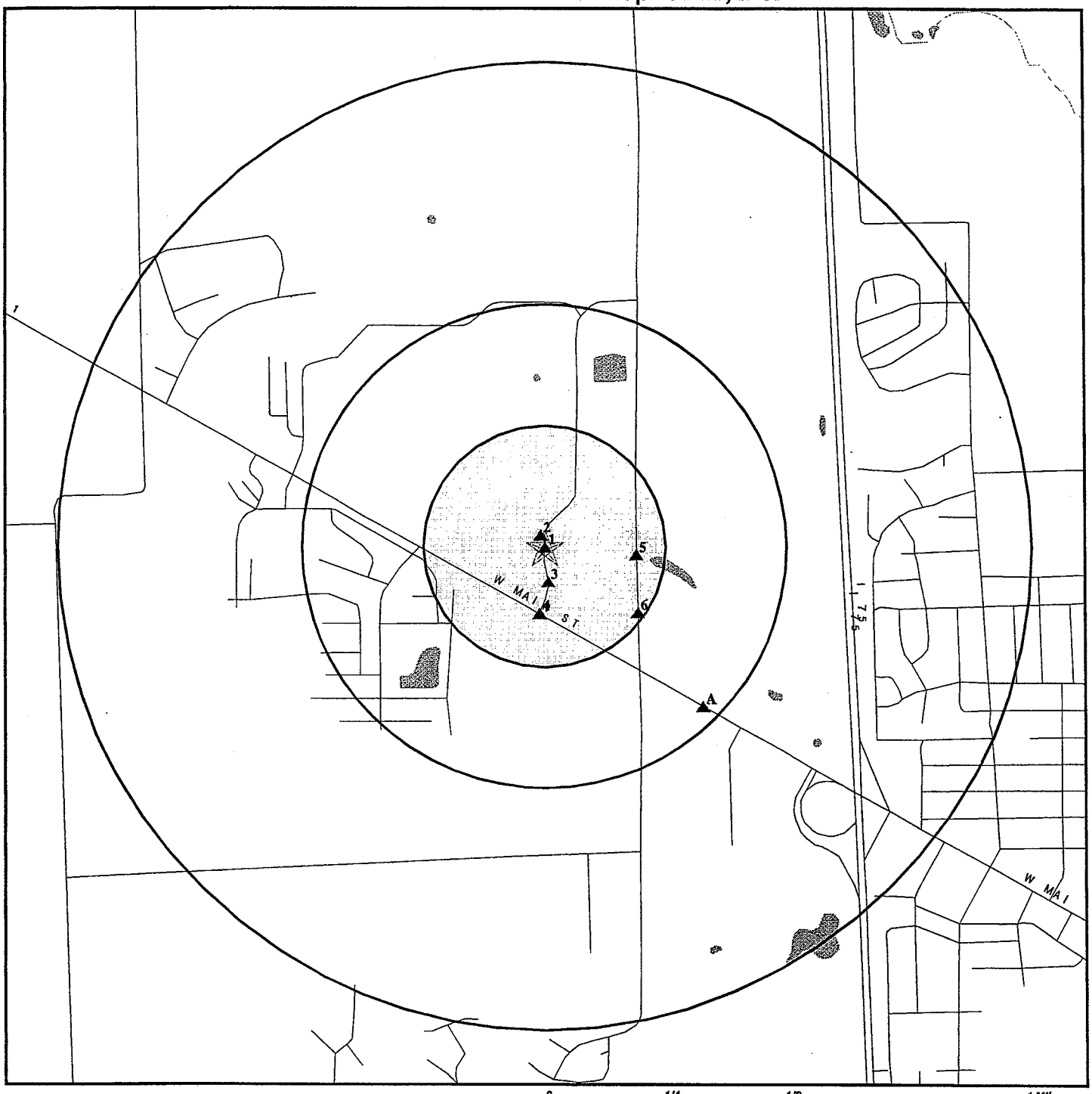
Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
TROY MAINTENANCE FACILITY CITY	*1400 EXPERIMENT FARM RD*	*1/8 - 1/4 E*	*5*	*7*

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

Site Name	Database(s)
DYE MILL RD LANDFILL	SHWS, DERR
HOBART BROS METAL FILLER DUMP	SHWS, DERR
MAXINE DAVIS	LUST
FORMER GAS STA	LUST
ODOT MAINTENANCE GARAGE	LUST
WAGNER PLUMBING & HEATING	LUST
CONCORD TWP GARAGE	LUST
TRUE NORTH # 809	UST

OVERVIEW MAP - 1729029.3p - ERM, Inc.

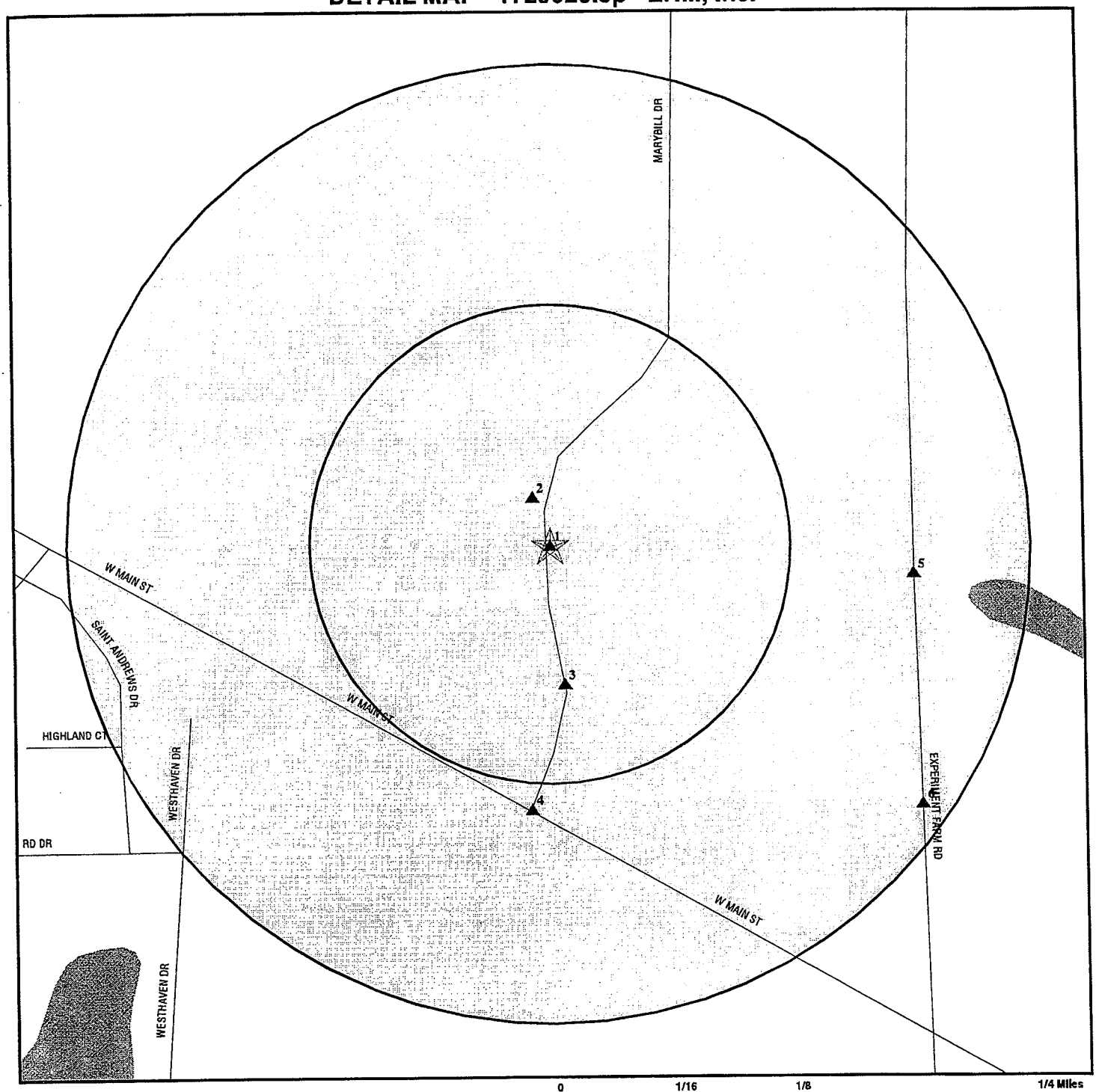


0 1/4 1/2 1 Miles

- ★ Target Property
- ▲ Sites at elevations higher than or equal to the target property
- ◆ Sites at elevations lower than the target property
- Coal Gasification Sites
- National Priority List Sites
- Landfill Sites
- Power transmission lines
- Oil & Gas pipelines
- Wetlands

TARGET PROPERTY:	Spinnaker Coating	CUSTOMER:	ERM, Inc.
ADDRESS:	30 Mary Bill Drive	CONTACT:	Leigh Sievert
CITY/STATE/ZIP:	Troy OH 45373	INQUIRY #:	1729029.3p
LAT/LONG:	40.0597 / 84.2443	DATE:	January 30, 2002 12:28 pm

DETAIL MAP - 1729029.3p - ERM, Inc.



0 1/16 1/8 1/4 Miles

- Target Property
- Sites at elevations higher than or equal to the target property
- Sites at elevations lower than the target property
- Coal Gasification Sites
- Sensitive Receptors
- National Priority List Sites
- Landfill Sites
- Power transmission lines
- Oil & Gas pipelines
- Wetlands

TARGET PROPERTY:	Spinnaker Coating	CUSTOMER:	ERM, Inc.
ADDRESS:	30 Mary Bill Drive	CONTACT:	Leigh Sievert
CITY/STATE/ZIP:	Troy OH 45373	INQUIRY #:	1729029.3p
LAT/LONG:	40.0597 / 84.2443	DATE:	January 30, 2002 12:28 pm

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
FEDERAL ASTM STANDARD								
NPL		1.000	0	0	0	0	NR	0
Proposed NPL		1.000	0	0	0	0	NR	0
CERCLIS		0.500	0	0	0	NR	NR	0
CERC-NFRAP		0.250	1	0	NR	NR	NR	1
CORRACTS		1.000	0	0	0	0	NR	0
RCRIS-TSD		0.500	0	0	0	NR	NR	0
RCRIS Lg. Quan. Gen.	X	0.250	0	0	NR	NR	NR	0
RCRIS Sm. Quan. Gen.		0.250	2	3	NR	NR	NR	5
ERNS		TP	NR	NR	NR	NR	NR	0
STATE ASTM STANDARD								
State Haz. Waste		1.000	1	0	0	0	NR	1
State Landfill		0.500	0	0	0	NR	NR	0
LUST		0.500	0	0	2	NR	NR	2
UST		0.250	0	1	NR	NR	NR	1
FEDERAL ASTM SUPPLEMENTAL								
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	0	0	0	0	NR	0
Delisted NPL		1.000	0	0	0	0	NR	0
FINDS	X	TP	NR	NR	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
MINES		0.250	0	0	NR	NR	NR	0
NPL Liens		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
RAATS		TP	NR	NR	NR	NR	NR	0
TRIS		TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
STATE OR LOCAL ASTM SUPPLEMENTAL								
OH Spills		TP	NR	NR	NR	NR	NR	0
DERR		TP	NR	NR	NR	NR	NR	0
EDR PROPRIETARY HISTORICAL DATABASES								
Coal Gas		1.000	0	0	0	0	NR	0
AQUIFLOW - see EDR Physical Setting Source Addendum								

TP = Target Property

NR = Not Requested at this Search Distance

* Sites may be listed in more than one database

Coal Gas Site Search: No site was found in a search of Real Property Scan's ENVIROHAZ database.

---

1 Target Property — **SPINNAKER COATING**, **30 MARY BILL DR**, **TROY, OH 45373** — **FINDS** **RCRIS-LQG** — **1000162876** **OHD980569263**

RCRIS:
Owner: SPINNAKER INDUSTRIES INC
(214) 855-0322

Contact: RICHARD OWENS
(513) 339-0561

Record Date: 09/08/1998
Classification: Large Quantity Generator

BIENNIAL REPORTS:
Last Biennial Reporting Year: 1999

Waste	Quantity (Lbs)	Waste	Quantity (Lbs)
D001	466.00	D039	65.00

Used Oil Recyc: No

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
AIRS Facility System (AIRS/AFS)
Biennial Reporting System (BRS)
Facility Registry System (FRS)
Ohio Core database (OH_CORE)
Resource Conservation and Recovery Act Information system (RCRAINFO)
Toxic Chemical Release Inventory System (TRIS)

---

2 NNW < 1/8 142 Higher — **CHROMPARTS INC**, **35 MARY BILL DR BLDG D**, **TROY, OH 45373** — **RCRIS-SQG** **FINDS** **CERC-NFRAP** **SHWS** **DERR** — **1000335086** **OHT400012514**

CERCLIS-NFRAP Classification Data:
Site Incident Category: Not reported — Federal Facility: Not a Federal Facility
Non NPL Code: NFRAP
Ownership Status: Other — NPL Status: Not on the NPL

CERCLIS-NFRAP Assessment History:

Assessment:	DISCOVERY	Completed:	06/01/1981
Assessment:	PRELIMINARY ASSESSMENT	Completed:	06/30/1987
Assessment:	PRELIMINARY ASSESSMENT	Completed:	03/28/1990

CHROMPARTS INC (Continued) **1000335086**

RCRIS:
Owner: CHROMPARTS INC
(312) 555-1212

Contact: DEAN CLINEFELTER
(513) 335-3333

Record Date: 11/15/1980
Classification: Not reported
Used Oil Recyc: No

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Resource Conservation and Recovery Act Information system (RCRAINFO)

SHWS:
Facility ID: 555-0166
EPA ID: OHT400012514
Lat/Long: 40 03 30 / 84 14 10
Facility Type: None

DERR:
Facility Id: 555-0166
Lat/Long: 40 03 30 / 84 14 10
EPA ID: OHT400012514
Voluntary Action Program: False

---

3 South < 1/8 385 Higher | **DATAJAM CORP**
15 MARYBILL DR
TROY, OH 45373 | **RCRIS-SQG FINDS** | **1000146994 OHD085511590**

RCRIS:
Owner: DATAJAM CORP
(312) 555-1212

Contact: DON BIRDSALL
(513) 339-5550

Record Date: 08/18/1980
Classification: Small Quantity Generator
Used Oil Recyc: No

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Resource Conservation and Recovery Act Information system (RCRAINFO)

---

4 South 1/8-1/4 732 Higher | **KIMBERLY CLARK CORP BROWN-BRIDGE DIV 2**
MARYBILL DRIVE
TROY, OH 45373 | **RCRIS-SQG** | **1000162878 OHT400011664**

KIMBERLY CLARK CORP BROWN-BRIDGE DIV 2 (Continued) **1000162878**

RCRIS:
Owner: NAME NOT REPORTED
(312) 555-1212

Contact: ENVIRONMENTAL COORDINATOR
(312) 555-1212

Record Date: Not reported
Classification: Not reported
Used Oil Recyc: No

Violation Status: No violations found

---

5 East 1/8-1/4 1002 Higher

TROY MAINTENANCE FACILITY CITY OF
1400 EXPERIMENT FARM RD
TROY, OH 45373

RCRIS-SQG FINDS UST
1000990732 OHR000000380

RCRIS:
Owner: MAYOR AND COUNCIL
(513) 339-1221

Contact: MARK J LIVENGOOD
(937) 339-5554

Record Date: 10/31/1997
Classification: Conditionally Exempt Small Quantity Generator
Used Oil Recyc: No

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Ohio Core database (OH_CORE)
Resource Conservation and Recovery Act Information system (RCRAINFO)

UST:

Facility ID:	55005715	Tank ID:	T00001
Owner:	CITY OF TROY		
Owner Address:	100 S MARKET ST TROY, OH 45373		
Capacity:	10000	Tank Status:	CIU
Install Date:	04/01/1985		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic		

TROY MAINTENANCE FACILITY CITY OF (Continued) **1000990732**

Facility ID:	55005715	Tank ID:	T00002
Owner:	CITY OF TROY		
Owner Address:	100 S MARKET ST TROY, OH 45373		
Capacity:	10000	Tank Status:	CIU
Install Date:	04/01/1985		
Content:	Diesel		
Tank Type:	Fiberglass Reinforced Plastic		
Facility ID:	55005715	Tank ID:	T00003
Owner:	CITY OF TROY		
Owner Address:	100 S MARKET ST TROY, OH 45373		
Capacity:	4000	Tank Status:	CIU
Install Date:	04/01/1985		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic		
Facility ID:	55005715	Tank ID:	T00004
Owner:	CITY OF TROY		
Owner Address:	100 S MARKET ST TROY, OH 45373		
Capacity:	550	Tank Status:	CIU
Install Date:	04/01/1985		
Content:	Used Oil		
Tank Type:	Fiberglass Reinforced Plastic		

6
SE
1/8-1/4
1244
Higher

VEDO TROY — **RCRIS-SQG** **1000561316**
1300 1300 EXPERIMENT FARM RD — **FINDS** **OHD987021151**
TROY, OH 45373

RCRIS:
Owner: DAYTON POWER AND LIGHT CO
(513) 227-2564

Contact: PAUL BROWN
(513) 338-2611

Record Date: 06/13/1991
Classification: Conditionally Exempt Small Quantity Generator, Hazardous Waste Transporter
Used Oil Recyc: No

Violation Status: No violations found

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Ohio Core database (OH_CORE)
Resource Conservation and Recovery Act Information system (RCRAINFO)

A7
SE
1/4-1/2
2457
Higher

FRIENDLY ICE CREAM CORP. — **LUST** **1000560292**
1903 W MAIN ST — **UST** **N/A**
TROY, OH 45373

Site 1 of 2 in cluster A

FRIENDLY ICE CREAM CORP. (Continued) **1000560292**

LUST:
Owner: FRIENDLY ICE CREAM CORP.
Facility Status: Inactive
LTF Status: 1 SUS/CON from regulated UST
Release Number: 55000051-N00001
Owner Address: 1903 W MAIN ST
TROY, OH 45373
FR Status: No Further Action letter issued
Old Facility Id: 550051
Former Lust Release Number: 552152500

UST:
Facility ID: 55000051 Tank ID: T00001
Owner: FRIENDLY ICE CREAM CORP.
Owner Address: 1903 W MAIN ST
TROY, OH 45373
Capacity: 20000 Tank Status: CIU
Install Date: / /
Content: Diesel
Tank Type: Cathodically Protected Steel

A8 SE 1/4-1/2 2524 Higher | **SPEEDWAY #5298**
1894 W MAIN ST
TROY, OH 45373 | **UST U000894366**
LUST N/A

Site 2 of 2 in cluster A

LUST:
Owner: JOHN KERR
Facility Status: Inactive
LTF Status: 1 SUS/CON from regulated UST
Release Number: 55000281-N00001
Owner Address: PO BOX 1500 ATTN:JOHN M HELMS
SPRINGFIELD, OH 45501
FR Status: Release id Disproved
Old Facility Id: 550281
Former Lust Release Number: 555059800

Owner: JOHN KERR
Facility Status: Inactive
LTF Status: 1 SUS/CON from regulated UST
Release Number: 55000281-N00002
Owner Address: PO BOX 1500 ATTN:JOHN M HELMS
SPRINGFIELD, OH 45501
FR Status: Release id Disproved
Old Facility Id: 550281
Former Lust Release Number: 555059801

SPEEDWAY #5298 (Continued) **U000894366**

UST:

Facility ID:	55000281	Tank ID:	T00001
Owner:	SPEEDWAY\SUPERAMERICA LLC		
Owner Address:	PO BOX 1500 ATTN:JOHN M HELMS SPRINGFIELD, OH 45501		
Capacity:	12000	Tank Status:	CIU
Install Date:	04/01/1990		
Content:	Gasoline		
Tank Type:	Steel		

Facility ID:	55000281	Tank ID:	T00002
Owner:	SPEEDWAY\SUPERAMERICA LLC		
Owner Address:	PO BOX 1500 ATTN:JOHN M HELMS SPRINGFIELD, OH 45501		
Capacity:	12000	Tank Status:	CIU
Install Date:	04/01/1990		
Content:	Gasoline		
Tank Type:	Steel		

Facility ID:	55000281	Tank ID:	T00003
Owner:	SPEEDWAY\SUPERAMERICA LLC		
Owner Address:	PO BOX 1500 ATTN:JOHN M HELMS SPRINGFIELD, OH 45501		
Capacity:	12000	Tank Status:	CIU
Install Date:	04/01/1990		
Content:	Gasoline		
Tank Type:	Steel		

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)	Facility ID
ALCONY	S104257540	MAXINE DAVIS	7997 RT 41	45373	LUST	
TROY	S104269025	FORMER GAS STA	SR 55 / SR 718	45373	LUST	
TROY	S103686363	DYE MILL RD LANDFILL	DYE MILL RD	45373	SHWS, DERR	555-0253
TROY	S101871559	HOBART BROS METAL FILLER DUMP	LYTLE RD	45373	SHWS, DERR	555-0390
TROY	S104778121	ODOT MAINTENANCE GARAGE	2423 W MARKET ST SR 55	45373	LUST	
TROY	S104257479	WAGNER PLUMBING & HEATING	4007 W SR 718	45373	LUST	
TROY	S104257481	CONCORD TWP GARAGE	2678 W SR 718	45373	LUST	
TROY	U003749476	TRUE NORTH # 809	1-75 / ST.RT. 41 (A)	45373	UST	55000086

EPA Waste Codes Addendum

Code	Description
D001	IGNITABLE HAZARDOUS WASTES ARE THOSE WASTES WHICH HAVE A FLASHPOINT OF LESS THAN 140 DEGREES FAHRENHEIT AS DETERMINED BY A PENSKY-MARTENS CLOSED CUP FLASH POINT TESTER. ANOTHER METHOD OF DETERMINING THE FLASH POINT OF A WASTE IS TO REVIEW THE MATERIAL SAFETY DATA SHEET, WHICH CAN BE OBTAINED FROM THE MANUFACTURER OR DISTRIBUTOR OF THE MATERIAL. LACQUER THINNER IS AN EXAMPLE OF A COMMONLY USED SOLVENT WHICH WOULD BE CONSIDERED AS IGNITABLE HAZARDOUS WASTE.
D039	TETRACHLOROETHYLENE

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

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

Elapsed ASTM days: Provides confirmation that this EDR report meets or exceeds the 90-day updating requirement of the ASTM standard.

FEDERAL ASTM STANDARD RECORDS

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

Date of Government Version: 10/22/01
Date Made Active at EDR: 12/11/01
Database Release Frequency: Semi-Annually
Date of Data Arrival at EDR: 11/05/01
Elapsed ASTM days: 36
Date of Last EDR Contact: 11/05/01

NPL Site Boundaries

Sources:

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

EPA Region 1
Telephone 617-918-1143

EPA Region 6
Telephone: 214-655-6659

EPA Region 3
Telephone 215-814-5418

EPA Region 8
Telephone: 303-312-6774

EPA Region 4
Telephone 404-562-8033

Proposed NPL: Proposed National Priority List Sites
Source: EPA
Telephone: N/A

Date of Government Version: 10/22/01
Date Made Active at EDR: 12/11/01
Database Release Frequency: Semi-Annually
Date of Data Arrival at EDR: 11/05/01
Elapsed ASTM days: 36
Date of Last EDR Contact: 11/05/01

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System
Source: EPA
Telephone: 703-413-0223
CERCLIS contains data on potentially hazardous waste sites that have been reported to the USEPA by states, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites which are either proposed to or on the National Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

Date of Government Version: 07/12/01
Date Made Active at EDR: 10/16/01
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 09/24/01
Elapsed ASTM days: 22
Date of Last EDR Contact: 12/26/01

CERCLIS-NFRAP: CERCLIS No Further Remedial Action Planned
Source: EPA
Telephone: 703-413-0223
As of February 1995, CERCLIS sites designated "No Further Remedial Action Planned" (NFRAP) have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the need for the site to be placed on the NPL, or the contamination was not serious enough to require Federal Superfund action or NPL consideration. EPA has removed approximately 25,000 NFRAP sites to lift the unintended barriers to the redevelopment of these properties and has archived them as historical records so EPA does not needlessly repeat the investigations in the future. This policy change is part of the EPA's Brownfields Redevelopment Program to help cities, states, private investors and affected citizens to promote economic redevelopment of unproductive urban sites.

Date of Government Version: 07/12/01
Date Made Active at EDR: 10/16/01
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 09/24/01
Elapsed ASTM days: 22
Date of Last EDR Contact: 12/16/01

CORRACTS: Corrective Action Report
Source: EPA
Telephone: 800-424-9346
CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 11/14/01
Date Made Active at EDR: 01/14/02
Database Release Frequency: Semi-Annually
Date of Data Arrival at EDR: 11/14/01
Elapsed ASTM days: 61
Date of Last EDR Contact: 11/14/01

RCRIS: Resource Conservation and Recovery Information System
Source: EPA/NTIS
Telephone: 800-424-9346
Resource Conservation and Recovery Information System. RCRIS includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA).

Date of Government Version: 06/21/00
Date Made Active at EDR: 07/31/00
Database Release Frequency: Varies
Date of Data Arrival at EDR: 07/10/00
Elapsed ASTM days: 21
Date of Last EDR Contact: 11/07/01

ERNS: Emergency Response Notification System
Source: EPA/NTIS
Telephone: 202-260-2342
Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 08/08/00
Date Made Active at EDR: 09/06/00
Database Release Frequency: Varies
Date of Data Arrival at EDR: 08/11/00
Elapsed ASTM days: 26
Date of Last EDR Contact: 10/25/01

FEDERAL ASTM SUPPLEMENTAL RECORDS

BRS: *Biennial Reporting System*
Source: EPA/NTIS
Telephone: 800-424-9346
The Biennial Reporting System is a national system administered by the EPA that collects data on the generation and management of hazardous waste. BRS captures detailed data from two groups: Large Quantity Generators (LQG) and Treatment, Storage, and Disposal Facilities.

Date of Government Version: 12/31/99
Database Release Frequency: Biennially
Date of Last EDR Contact: 12/17/01
Date of Next Scheduled EDR Contact: 03/18/02

CONSENT: Superfund (CERCLA) Consent Decrees
Source: EPA Regional Offices
Telephone: Varies
Major legal settlements that establish responsibility and standards for cleanup at NPL (Superfund) sites. Released periodically by United States District Courts after settlement by parties to litigation matters.

Date of Government Version: N/A
Database Release Frequency: Varies
Date of Last EDR Contact: N/A
Date of Next Scheduled EDR Contact: N/A

ROD: Records Of Decision
Source: NTIS
Telephone: 703-416-0223
Record of Decision. ROD documents mandate a permanent remedy at an NPL (Superfund) site containing technical and health information to aid in the cleanup.

Date of Government Version: 09/30/00
Database Release Frequency: Annually

Date of Last EDR Contact: 01/07/02
Date of Next Scheduled EDR Contact: 04/08/02

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

Date of Government Version: 11/13/01
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 11/05/01
Date of Next Scheduled EDR Contact: 02/04/02

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

Date of Government Version: 10/29/01
Database Release Frequency: Quarterly

Date of Last EDR Contact: 01/07/02
Date of Next Scheduled EDR Contact: 04/08/02

HMIRS: Hazardous Materials Information Reporting System
Source: U.S. Department of Transportation
Telephone: 202-366-4526
Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version: 05/31/01
Database Release Frequency: Annually

Date of Last EDR Contact: 10/22/01
Date of Next Scheduled EDR Contact: 01/21/02

MLTS: Material Licensing Tracking System
Source: Nuclear Regulatory Commission
Telephone: 301-415-7169
MLTS is maintained by the Nuclear Regulatory Commission and contains a list of approximately 8,100 sites which possess or use radioactive materials and which are subject to NRC licensing requirements. To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 10/25/01
Database Release Frequency: Quarterly

Date of Last EDR Contact: 01/07/02
Date of Next Scheduled EDR Contact: 04/08/02

MINES: Mines Master Index File
Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-5959

Date of Government Version: 08/24/01
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 01/02/02
Date of Next Scheduled EDR Contact: 04/01/02

NPL LIENS: Federal Superfund Liens
Source: EPA
Telephone: 205-564-4267
Federal Superfund Liens. Under the authority granted the USEPA by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner receives notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

Date of Government Version: 10/15/91
Database Release Frequency: No Update Planned
Date of Last EDR Contact: 11/19/01
Date of Next Scheduled EDR Contact: 02/18/02

PADS: PCB Activity Database System
Source: EPA
Telephone: 202-260-3936
PCB Activity Database. PADS Identifies generators, transporters, commercial storers and/or brokers and disposers of PCB's who are required to notify the EPA of such activities.

Date of Government Version: 09/30/01
Database Release Frequency: Annually
Date of Last EDR Contact: 11/13/01
Date of Next Scheduled EDR Contact: 02/12/02

RAATS: RCRA Administrative Action Tracking System
Source: EPA
Telephone: 202-564-4104
RCRA Administration Action Tracking System. RAATS contains records based on enforcement actions issued under RCRA pertaining to major violators and includes administrative and civil actions brought by the EPA. For administration actions after September 30, 1995, data entry in the RAATS database was discontinued. EPA will retain a copy of the database for historical records. It was necessary to terminate RAATS because a decrease in agency resources made it impossible to continue to update the information contained in the database.

Date of Government Version: 04/17/95
Database Release Frequency: No Update Planned
Date of Last EDR Contact: 12/11/01
Date of Next Scheduled EDR Contact: 03/11/02

TRIS: Toxic Chemical Release Inventory System
Source: EPA
Telephone: 202-260-1531
Toxic Release Inventory System. TRIS identifies facilities which release toxic chemicals to the air, water and land in reportable quantities under SARA Title III Section 313.

Date of Government Version: 12/31/99
Database Release Frequency: Annually
Date of Last EDR Contact: 12/26/01
Date of Next Scheduled EDR Contact: 03/25/02

TSCA: Toxic Substances Control Act
Source: EPA
Telephone: 202-260-5521
Toxic Substances Control Act. TSCA identifies manufacturers and importers of chemical substances included on the TSCA Chemical Substance Inventory list. It includes data on the production volume of these substances by plant site.

Date of Government Version: 12/31/98
Database Release Frequency: Every 4 Years
Date of Last EDR Contact: 10/24/01
Date of Next Scheduled EDR Contact: 01/21/02

FTTS: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
Source: EPA/Office of Prevention, Pesticides and Toxic Substances
Telephone: 202-564-2501
FTTS tracks administrative cases and pesticide enforcement actions and compliance activities related to FIFRA, TSCA and EPCRA (Emergency Planning and Community Right-to-Know Act). To maintain currency, EDR contacts the Agency on a quarterly basis.

Date of Government Version: 10/25/01
Database Release Frequency: Quarterly
Date of Last EDR Contact: 12/26/01
Date of Next Scheduled EDR Contact: 03/25/02

FTTS INSP: FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
Source: EPA
Telephone: 202-564-2501

Date of Government Version: 10/25/01
Database Release Frequency: Quarterly
Date of Last EDR Contact: 12/26/01
Date of Next Scheduled EDR Contact: 03/25/02

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

STATE OF OHIO ASTM STANDARD RECORDS

SHWS: Master Sites List
Source: Ohio Environmental Protection Agency
Telephone: 614-644-2068
State Hazardous Waste Sites. State hazardous waste site records are the states' equivalent to CERCLIS. These sites may or may not already be listed on the federal CERCLIS list. Priority sites planned for cleanup using state funds (state equivalent of Superfund) are identified along with sites where cleanup will be paid for by potentially responsible parties. Available information varies by state.

Date of Government Version: 03/01/99
Date Made Active at EDR: 04/21/99
Database Release Frequency: No Update Planned
Date of Data Arrival at EDR: 03/29/99
Elapsed ASTM days: 23
Date of Last EDR Contact: 12/11/01

SWF/LF: Licensed Solid Waste Facilities
Source: Ohio Environmental Protection Agency
Telephone: 614-644-2621
Solid Waste Facilities/Landfill Sites. SWF/LF type records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. Depending on the state, these may be active or inactive facilities or open dumps that failed to meet RCRA Subtitle D Section 4004 criteria for solid waste landfills or disposal sites.

Date of Government Version: 11/01/01
Date Made Active at EDR: 11/28/01
Database Release Frequency: Annually
Date of Data Arrival at EDR: 11/15/01
Elapsed ASTM days: 13
Date of Last EDR Contact: 11/14/01

LUST: Leaking Underground Storage Tank File
Source: Department of Commerce
Telephone: 614-752-7924
Leaking Underground Storage Tank Incident Reports. LUST records contain an inventory of reported leaking underground storage tank incidents. Not all states maintain these records, and the information stored varies by state.

Date of Government Version: 12/16/01
Date Made Active at EDR: 12/28/01
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 12/17/01
Elapsed ASTM days: 11
Date of Last EDR Contact: 12/17/01

UST: Underground Storage Tank Tank File
Source: Department of Commerce
Telephone: 614-752-7938
Registered Underground Storage Tanks. UST's are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA) and must be registered with the state department responsible for administering the UST program. Available information varies by state program.

Date of Government Version: 12/16/01
Date Made Active at EDR: 12/28/01
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 12/17/01
Elapsed ASTM days: 11
Date of Last EDR Contact: 12/17/01

STATE OF OHIO ASTM SUPPLEMENTAL RECORDS

SPILLS: Emergency Response Database
Source: Ohio EPA
Telephone: 614-644-2084
All reported incidents, spills or releases to the environment.

Date of Government Version: 12/31/98
Database Release Frequency: Varies
Date of Last EDR Contact: 12/11/01
Date of Next Scheduled EDR Contact: 03/11/02

DERR: Division of Emergency & Remedial Response's Database
Source: Ohio EPA, Div. of Emergency Response
Telephone: 614-644-3538
Sites that may or may not have contamination.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 12/01/01
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 12/18/01
Date of Next Scheduled EDR Contact: 03/18/02

EDR PROPRIETARY HISTORICAL DATABASES

Former Manufactured Gas (Coal Gas) Sites: The existence and location of Coal Gas sites is provided exclusively to EDR by Real Property Scan, Inc. ©Copyright 1993 Real Property Scan, Inc. For a technical description of the types of hazards which may be found at such sites, contact your EDR customer service representative.

Disclaimer Provided by Real Property Scan, Inc.

The information contained in this report has predominantly been obtained from publicly available sources produced by entities other than Real Property Scan. While reasonable steps have been taken to insure the accuracy of this report, Real Property Scan does not guarantee the accuracy of this report. Any liability on the part of Real Property Scan is strictly limited to a refund of the amount paid. No claim is made for the actual existence of toxins at any site. This report does not constitute a legal opinion.

OTHER DATABASE(S)

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

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

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

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

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 1999 from the U.S. Fish and Wildlife Service.

GEOCHECK®- PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

SPINNAKER COATING
30 MARY BILL DRIVE
TROY, OH 45373

TARGET PROPERTY COORDINATES

Latitude (North):	40.059700 - 40˚ 3' 34.9"
Longitude (West):	84.244301 - 84˚ 14' 39.5"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	735042.7
UTM Y (Meters):	4437812.5

EDR's GeoCheck Physical Setting Source Addendum has been developed to assist the environmental professional with the collection of physical setting source information in accordance with ASTM 1527-00, Section 7.2.3. Section 7.2.3 requires that a current USGS 7.5 Minute Topographic Map (or equivalent, such as the USGS Digital Elevation Model) be reviewed. It also requires that one or more additional physical setting sources be sought when (1) conditions have been identified in which hazardous substances or petroleum products are likely to migrate to or from the property, and (2) more information than is provided in the current USGS 7.5 Minute Topographic Map (or equivalent) is generally obtained, pursuant to local good commercial or customary practice, to assess the impact of migration of recognized environmental conditions in connection with the property. Such additional physical setting sources generally include information about the topographic, hydrologic, hydrogeologic, and geologic characteristics of a site, and wells in the area.

Assessment of the impact of contaminant migration generally has two principle investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata. EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

USGS TOPOGRAPHIC MAP ASSOCIATED WITH THIS SITE

Target Property: 2440084-A2 TROY, OH
Source: USGS 7.5 min quad index

GENERAL TOPOGRAPHIC GRADIENT AT TARGET PROPERTY

Target Property: General East

Source: General Topographic Gradient has been determined from the USGS 1 Degree Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

Target Property County	FEMA Flood Electronic Data
MIAMI, OH	Not Available

Flood Plain Panel at Target Property: Not Reported

Additional Panels in search area: Not Reported

NATIONAL WETLAND INVENTORY

NWI Quad at Target Property	NWI Electronic Data Coverage
TROY	YES - refer to the Overview Map and Detail Map

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

AQUIFLOW®

Search Radius: 2.000 Miles.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

MAP ID	LOCATION FROM TP	GENERAL DIRECTION GROUNDWATER FLOW
Not Reported		

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

Era:	Paleozoic
System:	Silurian
Series:	Middle Silurian (Niagoaran)
Code:	S2 *(decoded above as Era, System & Series)*

GEOLOGIC AGE IDENTIFICATION

Category: Stratifed Sequence

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps. The following information is based on Soil Conservation Service STATSGO data.

Soil Component Name:	CROSBY
Soil Surface Texture:	silt loam
Hydrologic Group:	Class C - Slow infiltration rates. Soils with layers impeding downward movement of water, or soils with moderately fine or fine textures.
Soil Drainage Class:	Somewhat poorly. Soils commonly have a layer with low hydraulic conductivity, wet state high in profile, etc. Depth to water table is 1 to 3 feet.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Hydric Status: Soil does not meet the requirements for a hydric soil.

Corrosion Potential - Uncoated Steel: HIGH

Depth to Bedrock Min: > 60 inches

Depth to Bedrock Max: > 60 inches

Soil Layer Information							
	Boundary			Classification			
Layer	Upper	Lower	Soil Texture Class	AASHTO Group	Unified Soil	Permeability Rate (in/hr)	Soil Reaction (pH)
1	0 inches	9 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay. FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 2.00 Min: 0.60	Max: 7.30 Min: 5.10
2	9 inches	13 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 0.20 Min: 0.06	Max: 7.30 Min: 5.10
3	13 inches	22 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 0.20 Min: 0.06	Max: 7.30 Min: 5.10
4	22 inches	60 inches	loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Silty Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay. FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), silt.	Max: 0.20 Min: 0.06	Max: 8.40 Min: 7.40

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

OTHER SOIL TYPES IN AREA

Based on Soil Conservation Service STATSGO data, the following additional subordinant soil types may appear within the general area of target property.

Soil Surface Textures:	silty clay loam loam
Surficial Soil Types:	silty clay loam loam
Shallow Soil Types:	silt loam clay clay loam
Deeper Soil Types:	stratified gravelly - coarse sand

ADDITIONAL ENVIRONMENTAL RECORD SOURCES

According to ASTM E 1527-00, Section 7.2.2, "one or more additional state or local sources of environmental records may be checked, in the discretion of the environmental professional, to enhance and supplement federal and state sources... Factors to consider in determining which local or additional state records, if any, should be checked include (1) whether they are reasonably ascertainable, (2) whether they are sufficiently useful, accurate, and complete in light of the objective of the records review (see 7.1.1), and (3) whether they are obtained, pursuant to local, good commercial or customary practice." One of the record sources listed in Section 7.2.2 is water well information. Water well information can be used to assist the environmental professional in assessing sources that may impact groundwater flow direction, and in forming an opinion about the impact of contaminant migration on nearby drinking water wells.

WELL SEARCH DISTANCE INFORMATION

DATABASE	SEARCH DISTANCE (miles)
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

FEDERAL USGS WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
1	400338084154200	1/2 - 1 Mile West

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
No PWS System Found		

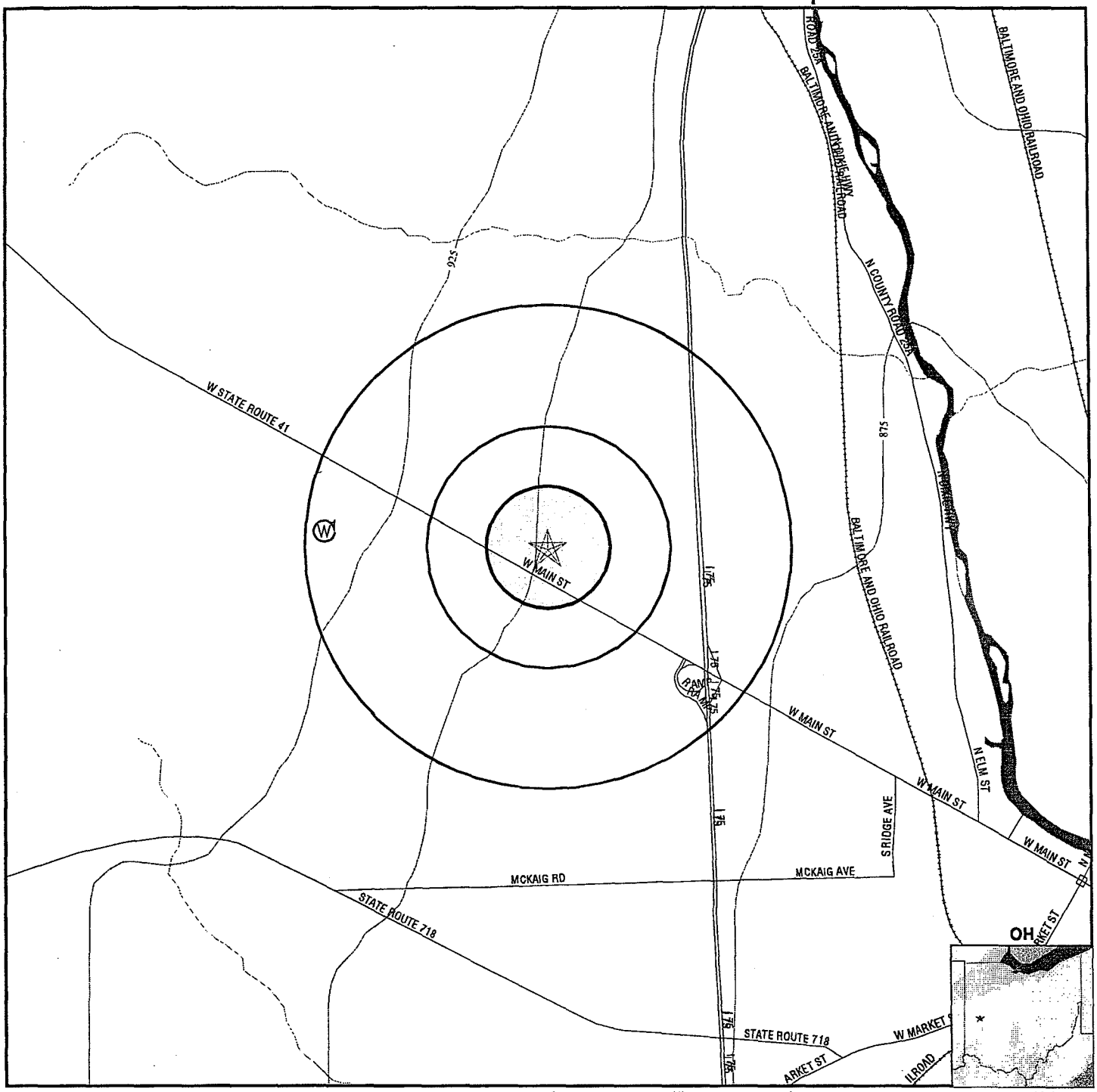
Note: PWS System location is not always the same as well location.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
No Wells Found		

PHYSICAL SETTING SOURCE MAP - 1729029.3p



0 1/2 1 2 Miles

- Major Roads
- Contour Lines
- Water Wells
- Public Water Supply Wells
- Groundwater Flow Direction
- Indeterminate Groundwater Flow at Location
- Groundwater Flow Varies at Location
- Cluster of Multiple Icons

Earthquake epicenter, Richter 5 or greater

TARGET PROPERTY:	Spinnaker Coating	CUSTOMER:	ERM, Inc.
ADDRESS:	30 Mary Bill Drive	CONTACT:	Leigh Sievert
CITY/STATE/ZIP:	Troy OH 45373	INQUIRY #:	1729029.3p
LAT/LONG:	40.0597 / 84.2443	DATE:	January 30, 2002 12:28 pm

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID Direction Distance Elevation	Database	EDR ID Number
1 **West** **1/2 - 1 Mile** **Higher**	**FED USGS**	**400338084154200**

BASIC WELL DATA

Site Type:	Single well, other than collector or Ranney type		
Year Constructed:	1979	County:	Miami
Altitude:	937.00 ft.	State:	Ohio
Well Depth:	68.00 ft.	Topographic Setting:	Flat surface
Depth to Water Table:	2.00 ft.	Prim. Use of Site:	Withdrawal of water
Date Measured:	06261979	Prim. Use of Water:	Domestic

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS
RADON

AREA RADON INFORMATION

Federal EPA Radon Zone for MIAMI County: 1

Note: Zone 1 indoor average level > 4 pCi/L.
: Zone 2 indoor average level >= 2 pCi/L and <= 4 pCi/L.
: Zone 3 indoor average level < 2 pCi/L.

Zip Code: 45373

Number of sites tested: 5

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	1.300 pCi/L	100%	0%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	8.280 pCi/L	20%	80%	0%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

HYDROLOGIC INFORMATION

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

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 1999 from the U.S. Fish and Wildlife Service.

HYDROGEOLOGIC INFORMATION

AQUIFLOW[R] Information System
Source: EDR proprietary database of groundwater flow information
EDR has developed the AQUIFLOW Information System (AIS) to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted to regulatory authorities at select sites and has extracted the date of the report, hydrogeologically determined groundwater flow direction and depth to water table information.

GEOLOGIC INFORMATION

Geologic Age and Rock Stratigraphic Unit
Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - A digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

STATSGO: State Soil Geographic Database
The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the national Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

ADDITIONAL ENVIRONMENTAL RECORD SOURCES

FEDERAL WATER WELLS

PWS: Public Water Systems
Source: EPA/Office of Drinking Water
Telephone: 202-260-2805
Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data
Source: EPA/Office of Drinking Water
Telephone: 202-260-2805
Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: In November 1971 the United States Geological Survey (USGS) implemented a national water resource information tracking system. This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on more than 900,000 wells, springs, and other sources of groundwater.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STATE RECORDS

Ohio Public Water Systems
Source: Ohio EPA, Division of Drinking and Groundwater
Telephone: 614-644-2752

RADON

Area Radon Information: The National Radon Database has been developed by the U.S. Environmental Protection Agency (USEPA) and is a compilation of the EPA/State Residential Radon Survey and the National Residential Radon Survey. The study covers the years 1986 - 1992. Where necessary data has been supplemented by information collected at private sources such as universities and research institutions.

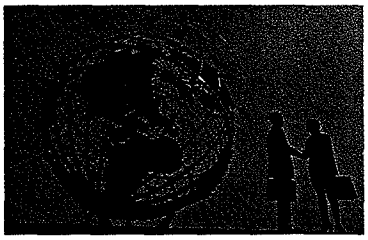
EPA Radon Zones: Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Epicenters: World earthquake epicenters, Richter 5 or greater
Source: Department of Commerce, National Oceanic and Atmospheric Administration

Appendix I
Professional Profiles

Leigh Anne Sievert



Over nine years of EH&S related experience including over three years with Ohio EPA, Division of Air Pollution Control providing technical assistance. Determined regulatory requirements and completed all aspects of permit application.

As a consultant, provided staff augmentation to support ISO 14001 certification process, and completed environmental regulatory reporting including hazardous waste, SARA 302, 303 and 311, Title V Fee Emission Reports, Title V Emission Inventory Statements, and SARA 313 (TRI). Experience also includes conducting environmental compliance audits, developing EH&S intranet web sites for two large manufacturing facilities, formulating industrial hygiene exposure assessment plans and conducting appropriate sampling and monitoring, investigating indoor air quality complaints and developing Health and Safety Management System, and performing Environmental Site Assesssments (ESAs).

Fields of Competence

- Environmental regulatory compliance & reporting
- ISO 14001
- Environmental Site Assessments (ESAs)
- Air permitting
- Clean air act amendments
- MACT compliance
- Air emissions inventory development
- Environmental auditing
- Pollution prevention
- EH&S Intranet development
- Health and safety management systems
- Health and safety program development
- Database development
- Industrial hygiene sampling/monitoring
- Environmental program development

Education

- B.S., Environmental Health, Bowling Green State University, 1995

Certification and Training

- OSHA 40 hour HAZWOPER Training, 1998

Key Projects

Provided ISO 14001 support for Tier 2 automotive suppliers preparing for certification.

Provided ISO 14001 staff support for newly certified facility including; writing and revising EMS documents, designing on-line EMS awareness reviews and tracking /publishing metrics.

Performed Environmental Site Assessments/ Compliance audits for international companies.

Performed air quality compliance audits for over 100 facilities.

Prepared emission inventories and emissions estimates while providing air permitting guidance and engineering support to a wide variety of industries including: dry cleaners, foundries, metal parts manufacturing, plastic recycling, stone processing plants, printing operations, sawmills, fuel burning operations, specialty rubber manufacturing, electronics, storage tanks, grain elevators and chrome plating.

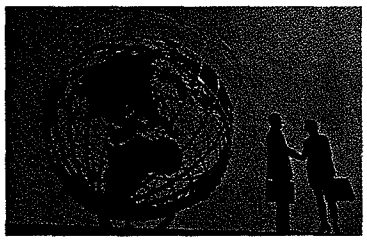
Conducted audits in response to U.S. EPA's SARA 313 Nitrate Compliance Initiative.

Prepared Integrated Contingency Plans for export /warehouse facility and automotive parts manufacturers.

Developed Health and Safety Management System for a large telecommunications company.

Developed EH&S web page for two large manufacturing facilities.

Dennis P. Shelly, P.E., DEE, CPEA



Mr. Shelly has more than 25 years of professional experience and provides strategic due diligence, environmental management, and compliance services to corporations, financial groups and their counsel. Mr. Shelly has extensive experience conducting and managing environmental due diligence services on transactions of all sizes on a local to global scale. He leads ERM's M&A Services Practice in New York City, New York, northern New Jersey, and Connecticut. His road experience includes conducting and managing environmental site assessments, compliance audits, and other environmental and engineering studies for the financial, real estate, commercial, legal, and industrial sectors. In addition, he has managed a variety of municipal and industrial water and wastewater treatment, permitting, distribution and collection projects. His responsibilities typically include designing and conducting environmental due diligence activities, coordinating multiple teams of auditors, ensuring quality and consistency of reporting, client and counsel liason, and presentation of findings. He has an exceptional record of simultaneously managing multiple complex and fast-paced projects.

Prior to joining ERM, Mr. Shelly was a co-founder of Alden Environmental Management, Inc., a firm that provided environmental auditing and due diligence services to a wide variety of corporate, legal, and financial institutions. In prior employment, he has been responsible for all aspects of non-remediation environmental projects for industry including wastewater treatment, environmental permits, and emergency response planning. He also managed a Management Consulting Department where he was responsible for corporate environmental program assistance including training and environmental reporting. His experience has included the power, steel, chemical, petroleum, pulp and paper, pharmaceutical, electronics and precious metals industries, as well as municipal water and wastewater.

Registration

- Registered Professional Engineer in PA, NJ, and DE
- Diplomate, Board Certified by American Academy of Environmental Engineers
- Professional Environmental Auditor, Board of Environmental Auditor Certifications

Fields of Competence

- Environmental due diligence assessments
- Environmental Management Systems
- Environmental compliance audits
- Corporate auditing program development
- Environmental program assistance, including training and environmental reporting

Credentials

- B.S., Civil Engineering, Pennsylvania State University, 1973
- M.E., Civil Engineering, Villanova University, 1979
- EPA Accredited Asbestos Building Inspector
- Part-time instructor, Villanova University, Graduate Program, Hazardous Waste Management (1990, 1992) and Industrial Wastewater Treatment (1990)
- Chair of Contractor/Vendor Assessment Work Group, Environmental Auditing Roundtable, 1996-98

Professional Affiliations

- Appointed Member of Water Quality Technical Advisory Committee for the Pennsylvania Department of Environmental Protection, 1996-2001

Key Projects

Managed the environmental due diligence assessment of a metal chemicals manufacturer as part of a proposed acquisition. The target company operated in 14 countries and over 100 locations. ERM prepared an estimate of environmental liabilities using a limited number of site visits, a data room review, and interviews with company personnel. The value of the transaction exceeded $1 billion.

Managed the environmental due diligence assessment of 21 facilities of a major film and video processing company located in 8 countries.

Managed the environmental due diligence of 15 locations of an agricultural chemical company located in 6 countries.

Managed the due diligence assessments of hundreds of industrial facilities, including: heavy equipment manufacturing; petroleum distribution; chemical and pharmaceutical; battery manufacturing; agricultural chemicals; railcar repair; electronics; meat processing; waste oil processors; auto parts; telecommunications; utilities; environmental and radiological laboratories; primary metals; explosives; children's apparel; and wire manufacturing.

Completed detailed audits of more than 80 operating waste management facilities across the U.S. during a 12-year period. As manager of an ongoing contract for a major consortium of companies, has been responsible for quality and scheduling of scores of waste management facility audits.

Completed compliance audits for the steel, mining, chemical, pharmaceutical, packaging, petroleum, paper, automobile, and metal finishing and production industries.

Has assisted corporate clients with reporting obligations under Community Right to Know since 1986. Provided technical guidance in the development of SARA 313 reporting software.

Completed Phase I environmental assessments of scores of commercial and retail properties throughout the country.

Designed a wastewater treatment facility for a precious metals product manufacturing facility. The process included ammonia stripping, two-stage neutralization, and metals removal to part-per-billion concentrations.

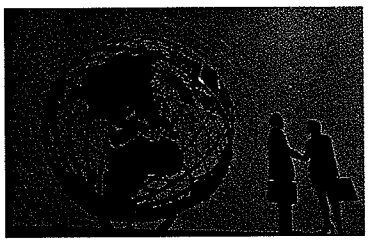
Provided wastewater treatment system analysis and operations assistance for an auto parts manufacturing company.

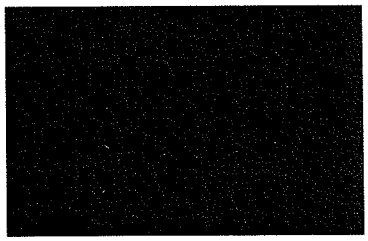
Completed pilot plant studies for wastewater discharges including landfill leachate, specialty chemicals, metal products manufacturing and municipal sanitary wastes.

Throughout his career, has completed water distribution system analyses, designed the expansion and upgrade of water and wastewater treatment facilities, oversaw the design and construction of assorted wastewater collection and treatment facilities, and provided operation analysis and consultation for wastewater treatment facilities.

Designed, specified, and supervised the manufacture and construction of major portions of a flue gas desulfurization facility for a major southwestern utility.

Daniel W. Longbrake





Fifteen years of diverse experience in the environmental consulting field. Experienced in the areas of permitting, negotiation, and implementation of projects associated with the RCRA and CERCLA programs. Extensive experience regarding the design, management, and execution of subsurface soil and groundwater investigations, contamination assessments, risk-based decision making, remedial action planning, and soil and groundwater remediation strategies for industrial clients. Has also assisted clients on numerous projects involving liability management/reduction, property acquisition/divestiture, voluntary cleanup programs, and aboveground and underground storage tank management.

Registration

- Certified Professional, Ohio EPA Voluntary Action Program

Fields of Competence

- Merger, Divestiture and Acquisition
- RCRA Corrective Action (RFA, RFI/CMS/CMI)
- RCRA permitting and closures
- CERCLA , RI/FS and RD/RA
- State voluntary clean-up programs (IL, IN, OH, PA)
- Multi-media assessment and remediation activities
- Storage tank management, assessment & remediation
- Environmental liability management & reduction strategies

Education

- B.S., Geology, Allegheny College, 1988

Professional Affiliations

- Air & Waste Management Association
- Association of Groundwater Scientists and Engineers
- Association of Iron and Steel Engineers
- Member of the Ohio Chamber of Commerce
- Member of the Ohio Cast Metals Association
- American Foundrymens Society

Recent Publications

"RCRA Corrective Action: Reforms, Initiatives, and Strategies." Presented at the 10th Annual Business and Industry's Environmental Symposium, Cincinnati, Ohio, March 22, 2001.

"The Due Diligence Process: Business Environmental Risk." Presented to Squire, Sanders & Dempsey, LLP, January 2001, and to Roetzel & Andress, November 2000.

Key Projects

Senior Manager and technical lead for a USEPA lead RCRA Corrective Action at a 700-acre steel mill site located in Northeastern Ohio. The site had over 100 solid waste management units (SWMUs) and areas of concern (AOCs). Contaminants were a complex array of constituents that include, but were not limited to, metals, volatile organic compounds (VOCs), and polynuclear aromatic hydrocarbons (PAHs). Participated in the negotiation of the Consent Order and Statement of Work (SOW), managed investigation and remediation activities, and provided technical oversight of all deliverables (workplans, reports, etc.).

Managed and participated in extensive multi-media environmental investigations related to RCRA RFI and CERCLA RI/FS at numerous military installations in the Southeast and Midwest. Contaminants included VOCs, SVOCs, pesticides/herbicides, and other more exotic contaminants. Work included workplan development, soil gas surveys, investigation activities (soil, groundwater, sediment, surface water) reporting, and remedial planning.

Managed preparation of a Focused Feasibility Study (FFS) and aided in negotiating, designing, and implementing recovery and interim remedial measures including containment remedies for groundwater impacted with pyridine-and coal tar-related constituents at a Superfund site in central Indiana. Work included extensive hydrogeologic investigation, fate and transport modeling, and risk assessment.

Project Manager for UST management program for client having over 100 retail gasoline service stations located in the southeast United States. Work included conducting preliminary contamination assessments, contamination assessments, remedial action plans, interim remedial actions, tank closures, and soil and groundwater remediation. Where applicable, reimbursement packages were prepared. As the manager of the program, responsibilities included agency negotiation, oversight of technical performance, and deliverables (reports, plans, etc.).

Served as Senior Project Manager for a Phase I/II environmental site assessment for a forge located in Central Indiana. Work included an asbestos survey, a PCB inventory and sampling, surface and subsurface soil sampling and analysis, groundwater sampling and analysis, interpretation of the results, and the development of remedial cost estimates. Specific concerns included former bulk fuel storage, a manufactured gas plant, and drum storage areas. Contaminants of concern included VOCs, PAHs, and metals. Work was conducted on a fast track to allow for quick decision-making as to the viability of purchasing the property.

Senior Manager for merger & acquisition project involving 45 retail gasoline stations. Work included Phase I and II Environmental Site Assessments. Phase II work included collection of soil and groundwater samples, and on-site analysis of collected samples utilizing a portable laboratory equipped with a gas chromatograph.

Managed the assessment of environmental liabilities for SEC filings for a major U.S. steel producer. Work included "white paper" studies and on-site evaluations to establish and/or update booked liabilities at nine locations.

Managed over 150 individual and/or multi-facility Phase I Environmental Site Assessments and limited compliance reviews related to property transfer at industrial and commercial facilities located throughout the U.S. Most assessments were conducted in general conformance with the ASTM standards in effect at the time (1994, 1997, 2000). Follow-on work often included Phase II Environmental Site Assessments. In many cases, environmental liabilities were quantified and summarized for use in negotiating the property transfer.

Managed voluntary cleanups in several states including Ohio, Indiana, Illinois, Pennsylvania and Florida. Where applicable, work was conducted in accordance with the state-specific voluntary cleanup program guidance and rules.