Sturgis Iron & Metal Co., Inc.
P O BOX 579, 70675 CE TERVILLE ROAD • STURGIS, MICHIGA 49091
Scrap Brokers
AREA CODE 269 • PHONE: 651-7851

948954

July 23, 2008

Ms. Grace Co
U.S. Environmental Protection Agency
Region 5 (SR-6J)
77 West Jackson Blvd
Chicago, IL 60604-3590

Via Federal Express

Re: Response to Request for Information Pursuant to Section 104(e) of CERCLA for Lusher Street Groundwater Contamination Site, Elkhart, Indiana

Dear Ms. Co:

Sturgis Iron and Metal Co., Inc. (Sturgis) hereby responds to your March 3, 2008 request for information pursuant to CERCLA Section 104(e). We understand that you had previously corresponded with Attorney David Hatchett who had requested an extension of the date to respond to that request. Mr. Hatchett is not representing the Company so please direct all future correspondence regarding this matter to my attention or that of our counsel, Arthur Siegal of Jaffe Raitt Heuer & Weiss, PC., 27777 Franklin, Suite 2500, Southfield, MI, 48034 and John Dresser of Dresser, Dresser, Haas & Caywood, P.C., 112 S. Monroe Street, Sturgis, MI 49091.

As you are aware, Sturgis filed a Chapter 11 Bankruptcy on April 4, 2008. As part of its winding down, Sturgis has terminated the employment of virtually all of its employees and of its consultants. The following answers your questions and requests, given these limitations.

1. State the dates during which you or your company have owned, operated, or leased a facility or any part thereof located within the boundaries of the Site and provide copies of all documents evidencing or relating to such ownership, operation, or lease arrangement (e.g. including but limited to purchase and sale agreements, deeds, leases, etc.).

ANSWER

Sturgis acquired four separate parcels of property which it consolidated as its property. Attached as Exhibit 1 is a map showing the four parcels:

A. The main (unnamed) parcel was purchased in 1985, see attached deeds and indenture, Exhibit 2.

B. The former Godfrey Marine property purchased by an affiliate in 1997 and by Sturgis in 2005, see attached Exhibit 3.

C. The former Patrick Industries property that was purchased in 2004, see attached Exhibit 4.

D. The former Elkhart Rubber property that was purchased in 2005 from Rick and Nona Hollar. See attached Exhibit 5.

2. Did you or any other person or entity ever use, purchase, store, treat, dispose, transport or otherwise handle any material containing chlorinated solvents, including but not limited to, trichloroethylene (TCE); trichloroethane (1,1,1-TCA); dichloroethene (trans 1,2-DCE; cis-1,2-DCE; or 1,1-DCE) or tetrachlorethylene (PCE) at the facility? If the answer to this question is anything but an unqualified "no" identify:

a) the chemical composition, characteristics, physical state (e.g., solid, liquid) of each material;

b) who supplied the material;

c) how, when, and where the material was used, purchased, generated, stored, treated, transported, disposed of or otherwise handled;

d) the quantity of such materials used, purchased, generated, stored, treated, transported, disposed of or otherwise handled;

e) all supervisory personnel for areas where chlorinated solvents were identified above. For each person identified, indicate the years during which they were a supervisor and, to the best of your knowledge and belief, their duties and responsibilities.

ANSWER: To the best of Sturgis' knowledge, neither Sturgis, nor any employee or agent of Sturgis ever used, purchased, stored, treated, disposed or transported any material containing chlorinated solvents. A review of Sturgis' records reflects no such chlorinated solvents having been purchased, used, stored, treated, or transported by Sturgis. Sturgis cannot answer this question as to any prior owner or occupant of the property as it has no knowledge with respect to the prior operators other than the reports which are appended hereto as Exhibit 6. Attached as Exhibit 7 are copies of EPCRTKA Tier Two forms prepared by Sturgis. Sturgis is aware of certain tests conducted by EPA of shredder fluff at the property and low levels of PCE detected in the fluff. See Exhibit 8 attached hereto. Sturgis has no information how such PCE came to be located in the fluff as it did not knowingly purchase, use, store, treat, transport or dispose of any material containing any chlorinated solvents. However, due to the nature of its business (recycling of used metals and vehicles), it appears that certain trace amounts of PCE found their way into automotive fluff on at least one occasion. That fluff was typically stored on the ground until it was removed and disposed of off-site.

3. Identify all past and present solid waste management units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc) at the facility. For each such solid waste management unit, provide the following information:

a) A map shows the unit's boundaries and the location of all known solid waste management units, whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;

b) the type of unit (e.g., storage area, landfill, waste pile, etc.) and the dimensions of the unit;

c) the dates that the unit was in use;

d) the purpose and past usage of the unit (e.g., storage, spill containment, etc.);

e) the quantity and types of materials (hazardous substances and any other chemicals) located in each unit;

f) the construction (materials, composition), volume, size, dates of cleaning, and condition of each unit; and

g) if unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

ANSWER: Sturgis only operated the following SWMUs, none of which are understood to be RCRA regulated as reflected on the attached map, Exhibit 9:

1. A diesel AST;

2. cast iron breakage storage

3. auto shredder fluff piles

4. baler pit

5. two 275 gallon used oil tanks (inside the Equipment Maintenance Building)

6. 700 gallon used oil tank (inside the Equipment Maintenance Building)

7. waste compactor (outside, on the east side of the Process Building)

8. metal piles (on the northeast and southwest side of the Mega-Shredder and various locations across the northwest portion of the property)

9. drums in the environmental station

These are reflected in the various reports that are provided herewith.

In 1992, the US EPA had prepared a Preliminary Assessment/Visual Site Inspection conducted of the former Patrick Paint property, a copy of which is attached behind tab 3 of Exhibit 6 and that report identified 10 SWMUs, but provided no map:

A. indoor waste storage area;

B. solvent still bottoms satellite accumulation area;

C. Wastewater treatment system

D. wastewater treatment filter cake accumulation area

E. former waste oil drip pans

F. former waste oil storage area

G. former UST

H. former outdoor drum storage area

I. former roll-off hopper area

J. Former caustic cleaner storage area

All of these SWMUs predated Strugis' ownership or operation.

4. Identify all leaks, spills, or releases into the environment of any chlorinated solvents that have occurred at or from the facility. In addition, identify:

a) when, where, and how such releases occurred;

b) the amount of each hazardous substance, or contaminant release;

c) activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental unites about the release;

d) investigations of the circumstance, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken; and

e) all persons with information relating to these releases.

ANSWER Sturgis is unaware of any release, leak or spill into the environment of any chlorinated solvents that have occurred at or from the facility.

In 1996, Sturgis had a Phase I and II Environmental Site Assessment done of the Godfrey Marine parcel which was owned and operated by various companies from at least 1910 until the mid 1980's. That report, a copy of which is attached behind tab 2 of Exhibit 6, did not investigate a known release or leak but it did reflect detections of low, but elevated levels of 1,1,1 Trichloroethane and Trichloroethene in groundwater prior to any activities by Sturgis. The consultant concluded that these detections resulted from an offsite source migrating onto the property.

In 1992, the US EPA had prepared a Preliminary Assessment/Visual Site Inspection conducted of the former Patrick Paint property, a copy of which is attached behind tab 3 of Exhibit 6.

In 2004, Sturgis had a Phase I and II Environmental Site Assessment done of the Patrick Paint parcel. That report, a copy of which is attached behind tab 4 of Exhibit 6, did not investigate a known release or leak but it did reflect detections of elevated levels of trichloroethylene in soils and low, but elevated levels of trichloroethylene and tetrachloroethylene in groundwater prior to any activities by Sturgis. The consultant concluded that these detections resulted from an offsite source migrating onto the property.

In 2005, Sturgis had a Phase I and II Environmental Site Assessment done of the Elkhart Rubber parcel which was owned and operated by Elkhart Rubber Works from at least 1910 until the early 1980's and then was operated by Draggoo Group and Draggoo Electric Company until 1992; and then was a glass and mirror processing facility from 1992 until 2005. That report, a copy of which is attached behind tab 5 of Exhibit 6, did not investigate a known release or leak but it did reflect detections of elevated levels of 1,1,1 Trichloroethane and Trichloroethene in groundwater and soils prior to any activities by Sturgis.

In 2006, Sturgis had soils analyzed and its on-site groundwater production wells analyzed and the laboratory indicated that there was a detection of 2-Butanone at 54 ug/L. See Exhibit 10.

In 2007, the City of Elkhart retained an environmental consultant to conduct an air quality assessment in the area of the Sturgis facility and a copy of that report is attached behind tab 1 of Exhibit 6. That report concluded that while VOCs were detected, it appeared that the Sturgis shredder "has minimal, if any, impact on the presence of VOCs in the atmosphere."

In 2008, Sturgis, conducted additional groundwater testing which again indicated impacts migrating from off-site onto the Sturgis property. Attached as Exhibit 11 are a diagram and spreadsheet relating to that sampling.

5. Provide copies of all local, state, and federal environmental permits ever granted for the facility of any part thereof (e.g., RCRA permits, NPDES permits, etc.)

ANSWER See attached:

A. IDEM Permit No. MSOP 039-20972-00622, New Source Construction Permit and minor source operating permit, office of air quality. Exhibit 12.

B. 2003 Elkhart Public Works Industrial Wastewater Discharge Permit No. 97-01 behind tab 6 of Exhibit 6.

C. 2005 general stormwater permit. Exhibit 13.

6. Identify any persons or entities, other than those responding to this information request that may have information about the history, use, purchase, storage, treatment, disposal, transportation or handling of any materials containing chlorinated solvents at any facilities in the area identified as the Lusher Street Ground Water Site.

ANSWER

Joe Turpin, Director of Purchasing
Non-Responsive
Shipshewana IN 46565
260-768-7313

Christina Baldwin, Purchasing Manager
Non-Responsive
Sturgis MI 49091
269-659-8329

Dale McDougle, General Operations Manager
Non-Responsive
Elkhart IN 46517
574-875-7815

Charles Kelley Jr, Elkhart Operations Manager
Non-Responsive
Elkhart IN 46517
574-293-3176

David Centeno, Health & Environmental Safety Manager
Non-Responsive
Goshen IN 46526
No Phone # on file

Nick Miedema, Health & Environmental Safety Manager
Last Known Address: Non-Responsive
Constantine MI 49042
269-435-7264

Mr. Rick Hollar, Owner of ANEWCO
Non-Responsive
No other information on file

John Smits, Project Manager
Non-Responsive
Sturgis MI 49091
269-651-4263

Thomas O'Connell, ERM Partner
3352 128th Avenue
Holland, MI 49424
616-738-7340

Sara Turrell, ERM, Project Manager
3352 128th Avenue
Holland, MI 49424
616-738-7362

Matt Kwiatkowski, ERM, Project Manager
3352 128th Avenue
Holland, MI 49424
616-738-7396

Mike Beck, ERM, Partner
3352 128th Avenue
Holland, MI 49424
616-738-7320
Matthew Boardman, ERM, Project manager
3352 128th Avenue
Holland, MI 49424
616-738-7361

Dan Rusiecki – ERM, assessor
3352 128th Avenue
Holland, MI 49424

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision following an approach designed to assure that the information was properly gathered and evaluated.

Based upon my first-hand knowledge and efforts to locate information and documents, the information submitted is, to the best of my knowledge and belief, true, accurate and as

complete as possible. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Sturgis Iron and Metal, Inc.

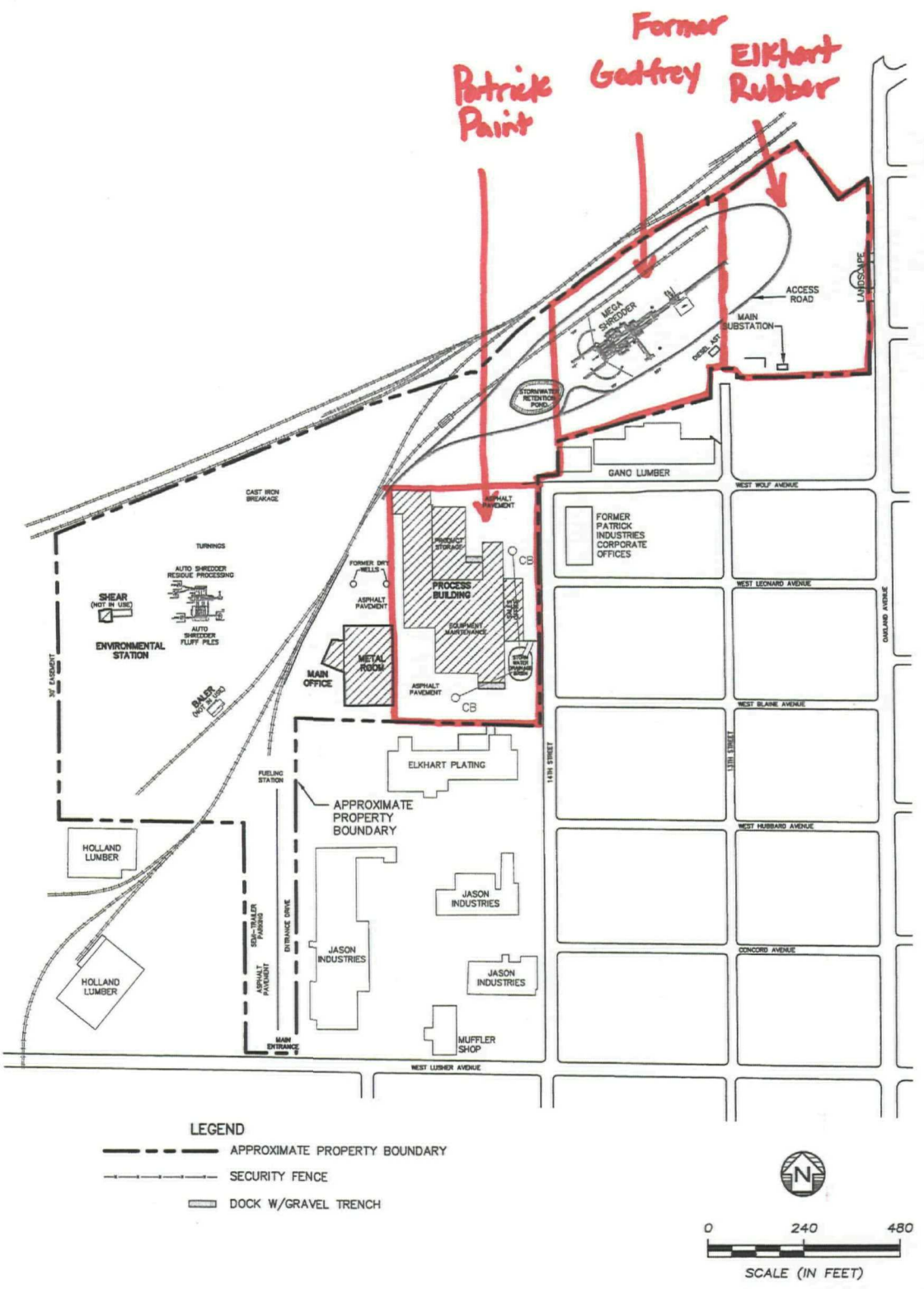
Kevin Young,
Vice-President and Chief Operating Officer

cc: Arthur H. Siegal
John Dresser, Esq.
Michael Khoury, Esq.

EXHIBIT 1

R:\CADD\ClntQ-T\Sturgis Iron and Metal\0080520\Elkhart Lusher Ave\0080520-01 ELKHART LUSHER AVE.dwg, SITE PLAN, 3/24/2008 3:08:28 PM, FAK

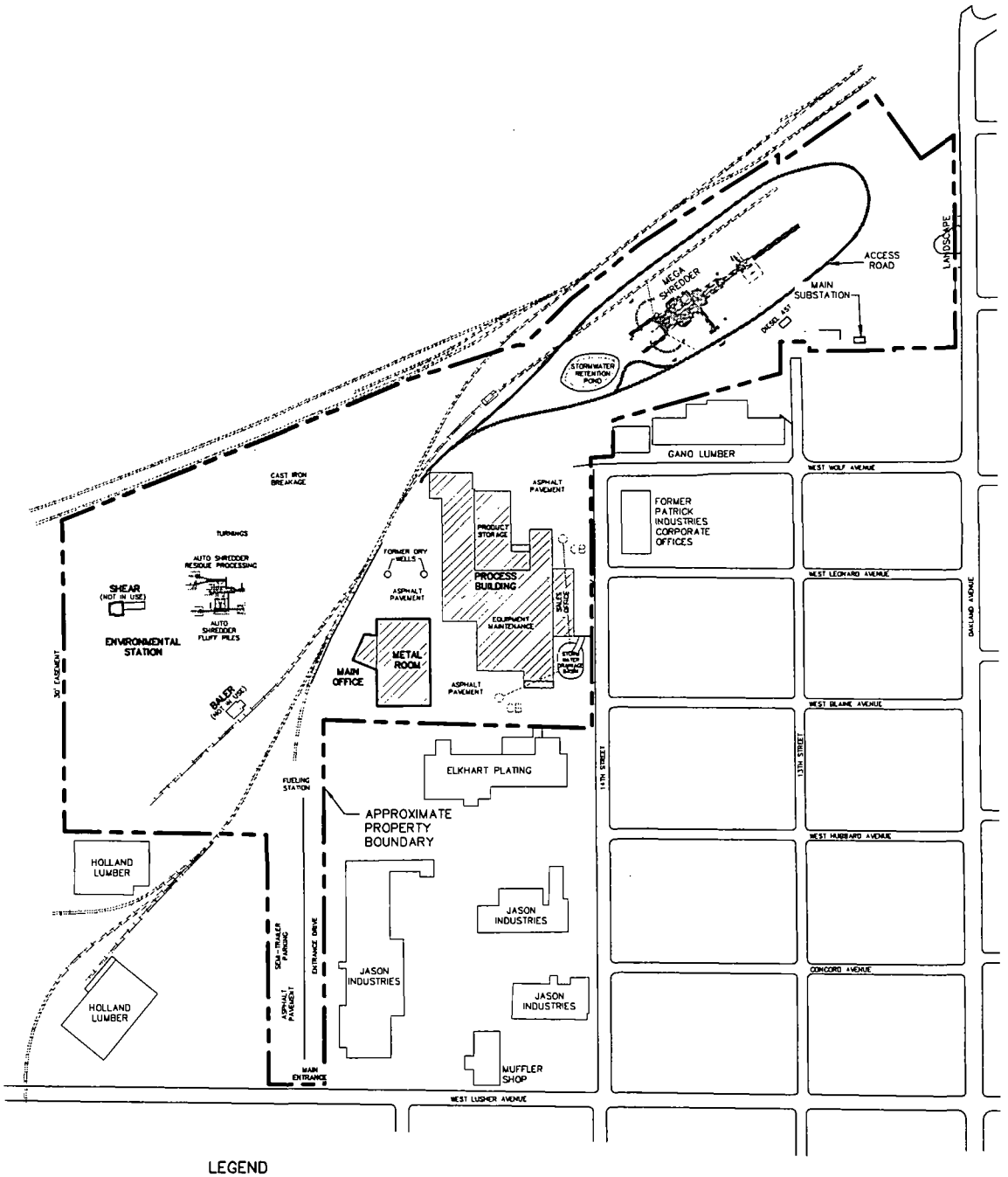
SITE MAP



CADD Review FAK	ERM.	STURGIS IRON & METAL 1514 LUSHER AVENUE ELKHART, INDIANA	CHK'D BY: CAH
DRAWN BY: RMK			0080520
Date Drawn/Rev'd 2/27/08–3/24/08		Environmental Resources Management	FIGURE 2

R:\CADD\ClntQ-T\Sturgis Iron and Metal\0080520\Elkhart Lusher Ave\0080520-01 ELKHART LUSHER AVE.dwg, SITE PLAN, 3/24/2008 3:08:28 PM, FAK

SITE MAP



CADD Review FAK	ERM	**STURGIS IRON & METAL** 1514 LUSHER AVENUE ELKHART, INDIANA	CHK'D BY: CAH
DRAWN BY: RMK			0080520
Date Drawn/Rev'd 2/27/08-3/24/08		Environmental Resources Management	FIGURE 2

EXHIBIT 2

Vesting Deed

Mail Deed to:
Sturgis Iron & Metal Co., Inc.
P. O. Box 579
70675 Centerville Road
Sturgis, Michigan 49091

Mail Tax Bills to:
Same

VOL 415 PAGE 739
DULY ENTERED FOR TAXATION
May 17 1985
Lyla J. Moore AUDITOR
01312

CORPORATE WARRANTY DEED

THIS INDENTURE WITNESSETH, That THE 1610 CORPORATION ("Grantor"), a corporation organized and existing under the laws of the State of Indiana, CONVEYS AND WARRANTS to STURGIS IRON & METAL CO., INC. ("Grantee"), a corporation organized and existing under the laws of the State of Michigan, for the sum of One Dollar ($1.00) and other valuable consideration, the receipt of which is hereby acknowledged, the following described real estate in Elkhart County, in the State of Indiana:

(SEE EXHIBIT A ATTACHED HERETO)

Subject to real estate taxes for the year 1984 and all subsequent years; provided, however, that grantor expressly assumes and agrees to pay (a) all of the 1984 real estate taxes due and payable in 1985 and (b) 34% of the 1985 real estate taxes due and payable in 1986.

Subject also to all zoning laws, easements, restrictions and covenants of record.

The undersigned persons executing this deed on behalf of Grantor represent and certify that they are duly elected officers of Grantor and have been fully empowered, by proper resolution of the Board of Directors of Grantor, to execute and deliver this deed; that Grantor has full corporate capacity to convey the real estate described herein; and that all necessary corporate action for the making of such conveyance has been taken and done.

IN WITNESS WHEREOF, Grantor has caused this deed to be executed this 3rd day of May, 1985.

THE 1610 CORPORATION

(SEAL) ATTEST:

By _____ By _____

760922
MAY 17 3 29 PM '85
ELKHART COUNTY RECORDER
JOYCE M. ROKE
FILED FOR RECORD

STATE OF INDIANA)
) SS:
ST. JOSEPH COUNTY)

Before me, a Notary Public in and for said County and State, personally appeared JAMES E. HURWICH and MORTON M. DOBBINS, the PRESIDENT and ASSISTANT SECRETARY respectively of The 1610 Corporation, who acknowledged execution of the foregoing Deed for and on behalf of said Grantor, and who, having been duly sworn, stated that the representations therein contained are true.

Witness my hand and Notarial Seal this 3rd day of May, 1985.

Edward J. Gray, Notary Public
Residing in St. Joseph County,
Indiana

My Commission Expires
September 30, 1986

This instrument was prepared by Edward J. Gray, Attorney at Law.

INDIANA GROSS INCOME TAX
SALE OF REAL ESTATE
Paid by
1610 Corp.
Date paid May 17, 1985
Amount $ $42.00
Treasurer's Receipt 4/33103
Elkhart County

An irregular shaped parcel of land in the Southeast Quarter of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East of the Second Principal Meridian in the City of Elkhart, in the County of Elkhart, in the State of Indiana, described as follows:

Beginning at a point on a line which is parallel with, west of and distant five hundred ninety (590) feet, as measured along the South line of said Section Seven (7), from the East line of the land known as Parcel No. One (1) in the conveyance to A. Davidson and Co., Inc., dated July 13, 1953 and recorded on January 25, 1954 in Book 199, page 252 in the records of the Recorder of Elkhart County, Indiana, said point also being nine hundred sixty-four and forty-three hundredths (964.43) feet north of the South line of said Section Seven (7), as measured along said East line of land conveyed to A. Davidson and Co., Inc., said point of beginning is also the Northwest corner of the property covered by the above conveyance; thence northerly along the projection of the said five hundred ninety (590) feet West and parallel line a distance of fifty-six (56) feet to a point; thence northerly along a line making a deflection angle to the left from the last described course of zero (0) degrees forty-two (42) minutes, zero (0) seconds for a distance of two hundred ninety-eight and twenty-one hundredths (298.21) feet to a point; thence northeasterly along a line making an angle of one hundred eleven (111) degrees eighteen (18) minutes forty (40) seconds to the last described course, as measured from South to East, a distance of seven hundred and sixty-nine hundredths (700.69) feet to a point; thence northeasterly along a line making a deflection angle to the left of the last described course of one (1) degree ten (10) minutes thirty (30) seconds, a distance of one hundred fifty-two and fifty-seven hundredths (152.57) feet to a point; thence southeasterly along a line making an angle of one hundred four (104) degrees forty-seven (47) minutes zero (0) seconds to the last described course, as measured from West to South, a distance of one hundred nineteen and sixty-five hundredths (119.65) feet, more or less to the intersection of the Northeasterly projection of the Easterly line of that land known as Parcel No. 2 in the conveyance to the A. Davidson and Co., Inc. aforementioned; thence Southwesterly along said Northeasterly projection a distance of three hundred ninety-three and forty-five hundredths (393.45) feet, more or less, to the Northeast corner of said aforementioned conveyance; thence westerly along the irregular Northerly line of the aforementioned conveyance to A. Davidson and Co., Inc. to the point of beginning.

avp 23

EXHIBIT A

(Page 1 of 2)

ALSO, a non-exclusive easement for roadway purposes across the following described premises in the City of Elkhart, County of Elkhart, and State of Indiana:

A strip of land constituting a roadway thirty (30) feet in width running in a northerly and southerly direction lying easterly of, adjacent to, and contiguous with the Easterly line of that certain parcel of land conveyed to Robert G. Homan and Marie M. Homan by deed dated July 15, 1963 and recorded August 20, 1963 in Deed Record 247, page 215, said thirty (30) foot strip commencing at the Northerly line of a street known as Lusher Avenue and terminating at the Northerly line of the aforementioned conveyance.

ALSO, a non-exclusive easement for roadway purposes across the following described premises in the City of Elkhart, County of Elkhart, and State of Indiana:

That part of the Southeast Quarter of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East of the Second Principal Meridian in the City of Elkhart, County of Elkhart, State of Indiana, described as follows:

A strip of land Thirty (30) feet in width bounded on the South by a line Five Hundred Seventy (570) feet North of the North line of Lusher Avenue and on the North by the Westerly projection of the Northerly line of that tract of land conveyed to Warren J. Rommes, Trustee, by a deed dated May 4, 1965 (said deed being recorded in Deed Record 265, Pages 605, 606 and 607) and lying Westerly of and contiguous with the Westerly line of lands conveyed to said Warren J. Rommes, Trustee, as now located.

Vesting Deed

VOL 415 PAGE 743

ST. JOSEPH COUNTY, INDIANA
BAR ASSOCIATION
PROPERTY FORM 561 — 1975

MAIL DEED TO:

Sturgis Iron & Metal Co., Inc.
P. O. Box 479
70675 Centerville Road
Sturgis, Michigan 49091

MAIL TAX BILLS TO:

Same

AUDITOR'S RECORD

Transfer No. _____

Taxing Unit _____

Date _____

MAY 17 3 29 PM '85

ELKHART COUNTY RECORDER
JOYCE M. ROWE
FILED FOR RECORD

WARRANTY DEED

760923

JAMES E. HURWICH the Grantor

Convey and Warrant s to STURGIS IRON & METAL CO., INC.

DULY ENTERED FOR TAXATION

May 17 1985

AUDITOR

the G antee

for and in consideration of One Dollar ($1.00) and other good and valuable consideration

0133

the receipt of which is hereby acknowledged. Real Estate in Elkhart County, in the State of Indiana, described as follows:

SEE EXHIBIT "A" ATTACHED HERETO.

Subject to real estate taxes for the year 1984 and all subsequent years; provided, however, that grantor expressly assumes and agrees to pay (a) all of the 1984 real estate taxes due and payable in 1985 and (b) 34% of the 1985 real estate taxes due and payable in 1986.

Subject also to all zoning laws, easements, restrictions and covenants of record.

Subject also to a real estate mortgage in the original principal amount of $120,000.00 in favor of Joseph P. Goldman dated March 8, 1978 and recorded March 9, 1978 in Mortgage Record 453, page 196 of the records of Elkhart County, Indiana which grantor assumes and agrees to pay in accordance with its terms. Grantor hereby certifies that the unpaid balance of said mortgage as of this date is $62,755.40. If grantor does not pay off the balance of said mortgage and have it released of record on or before July 3, 1985, grantee is authorized to do so, and offset such payment against the Promissory Note issued by grantee to grantor as of this date in accordance with the terms of said Promissory Note.

Signed and dated on May 3, 1985

James E. Hurwich
Typed or printed name

Signature

Typed or printed name

Signature

Typed or printed name

Signature

Typed or printed name

State of Indiana, St. Joseph County, ss:

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared:

James E. Hurwich

and acknowledged the execution of the foregoing deed on

May 3, 1985

Edward J. Gray, Notary Public

Typed or printed name

My commission expires September 30, 1986

Prepared by Edward J. Gray, Attorney at Law, 6th Fl., 1st Source Bank Center, 100 North Michigan, South Bend, Indiana 46601

TRACT A - A part of the Southeast Quarter (SE¼) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

Commencing at the northwest corner of Concord Avenue and Fourteenth Street, said point being fifty (50) feet westwardly from the southwest corner of Lot Number One Hundred Eighteen (118) Elliston Addition to the City of Elkhart, Indiana; thence north eighty-nine (89) degrees two (2) minutes west along the north line of said Concord Avenue, six hundred thirteen and twenty-five hundredths (613.25) feet to an iron stake on the east line of land formerly owned by the New York Central Railroad Company; thence north along the east line of said railroad lands five hundred twenty-four and eighty-three hundredths (524.83) feet to the beginning point of this description; thence north seventy-nine and seventeen hundredths (79.17) feet; thence north eighty-nine (89) degrees two (2) minutes west twenty-three and twenty-five hundredths (23.25) feet; thence north twenty-seven (27) degrees fifty-nine (59) minutes east five hundred sixty-two and two tenths (562.2) feet to an iron stake; thence north seventy-four (74) degrees twenty-seven (27) minutes east three and five tenths (3.5) feet to an iron stake; thence south three (3) degrees fifty-six (56) minutes west fifty-eight and forty-three hundredths (58.43) feet to an iron stake; thence south five (5) degrees forty (40) minutes east one hundred thirty-five and forty-five hundredths (135.45) feet to an iron stake; thence south one (1) degree forty (40) minutes east seventy-nine and thirty-five hundredths (79.35) feet; thence south zero (0) degrees two (2) minutes west three hundred twelve and nine tenths (312.9) feet to an iron stake; thence westwardly two hundred fifty-four and four tenths (254.4) feet to the place of beginning.

ALSO, an Easement for ingress and egress over and across a strip of land approximately one (1) foot in width east and west adjacent to and immediately east of the above described real estate, as shown of record in the deed recorded June 16,1941 in Deed Record 168, page 39 of the records of Elkhart County, Indiana.

PARCEL ONE: A part of the Southeast Quarter (SE¼) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

Beginning at the point of intersection of the south line of said Section Seven (7) and the extension southerly of the east line of vacated Lot Number Twenty-six (26) in Elliston Addition, recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana; said point of intersection being one thousand one hundred seventy-five and four tenths (1,175.4)

EXHIBIT A

(Page 1 of 5)

feet, more or less, east of the southwest corner of said southeast quarter of Section Seven (7), measured along said south line of said Section Seven (7); thence north along a straight line which is the east lines of vacated Lots Number Twenty-six (26), Seventy-nine (79), One Hundred Thirty (130), One Hundred Eighty-three (183), Two Hundred Thirty-four (234) and Two Hundred Eighty-seven (287) in aforesaid Addition, and the extension North and South of said East lines across the vacated streets and alleys in aforesaid addition, to an intersection with the north line of Blaine Avenue in aforesaid addition, a distance of nine hundred thirty-six (936) feet, more or less, measured along said east lines and their extensions; thence westerly along the north line of vacated Blaine Avenue and parallel to the south line of said Section Seven (7), a distance of twenty-four and eighty-seven hundredths (24.87) feet; thence southwesterly along a curved line, convex to the northwest, having a radius of four hundred seventy-seven and sixty-eight hundredths (477.68) feet, an arc distance of seventy (70) feet, more or less, to a point of tangency in a straight line which is parallel to, west of and distance thirty (30) feet by rectangular measurement from the first course of the parcel hereby described, said point of tangency being eight hundred sixty-six and two tenths (866.2) feet north of the south line of said Section Seven (7), measured along said line which is parallel to the first course of the parcel hereby described; thence south along said straight line a distance of seven hundred thirty-six and two tenths (736.2) feet; thence west along a straight line which is parallel to the south line of said Section Seven (7) a distance of seventy (70) feet, more or less, to an intersection with a line which is parallel to, west of and distant one hundred (100) feet by rectangular measurement from the first course of the parcel hereby described; thence south along a straight line which is parallel to the first course of the parcel hereby described, a distance of one hundred thirty (130) feet to the south line of said Section Seven (7); thence east along the south line of said Section Seven (7), a distance of one hundred (100) feet, more or less, to the point of beginning; said parcel being part of Lots Number Twenty-six (26), Twenty-seven (27), Twenty-eight (28), Seventy-nine (79), One Hundred thirty (130), One Hundred Eighty-three (183), Two Hundred Thirty-four (234), and Two Hundred Eighty-seven (287), and parts of Markel Avenue, Hubbard Avenue and Blaine Avenue, and the alleys adjoining said part of lots, all in that part of aforesaid Elliston Addition which was vacated by order entered September 12, 1907 in the Elkhart Superior Court, a certified copy of said order having been recorded December 12, 1907 in Record 116, page 53 of the records in the Office of the Recorder of Elkhart County, Indiana.

PARCEL TWO: A part of the Southeast Quarter (SE¼) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

Beginning at a point in a line which is parallel to, west of and adjacent five hundred ninety (590) feet, measured along a line which is parallel to the south line of said Section Seven (7), from the east line of Parcel One above described and the extension north of said east line, said point of beginning being nine hundred sixty-four and forty-three hundredths (964.43) feet north of the south line of said Section Seven (7), measured along said line which is parallel to the east line of Parcel One above described and the extension north of said east line; thence northeasterly along a curved line, convex to the northwest having a radius of four hundred seventy-seven and sixty-eight hundredths (477.68) feet, an arc distance of one hundred seventy-nine (179) feet, more or less, to a point of tangency in a straight line which begins at a point in last described parallel line which is thirty-four and sixty hundredths (34.60) feet north of the point of beginning of this description, measured along said parallel lines, and extends northeasterly to a point in a line which is parallel to, west of and distant twenty-four and eighty-seven hundredths (24.87) feet from the extension to the north of the east line of Parcel One above described, measured along a line which is parallel to the south line of said Section Seven (7), said point being forty-nine and eighty-five hundredths (49.85) feet south of a line which is parallel to, north of and distant one thousand two hundred twelve and forty-six hundredths (1,212.46) feet from the south line of said Section Seven (7), measured along a line which is parallel to the East line of Parcel One above described and the extension north of said east line; thence northeasterly along said straight line a distance of two hundred twenty-one and fifty-five hundredths (221.55) feet to a point of tangency; thence northeasterly along a curved line, convex to the southeast, having a radius of four hundred seventy-seven and sixty-eight hundredths (477.68) feet, an arc distance of two hundred six and five tenths (206.5) feet, more or less, to a point in said line which is parallel to, north of and distant one thousand two hundred twelve and forty-six hundredths (1,212.46) feet, from the south line of said Section Seven (7), said point being twenty-four and eighty-seven hundredths (24.87) feet, measured along a line which is parallel to the south line of said Section Seven (7), west of the intersection of the extension to the north of the east line of Parcel One above described and the said line which is parallel to, north of and distant one thousand two hundred twelve and forty-six hundredths (1,212.46) feet from the south line of said Section Seven (7); thence easterly parallel with the said South line

of Section Seven (7), a distance of one hundred six and ninety-four hundredths (106.94) feet; thence southwesterly along a straight line a distance of five hundred ninety-five and forty-one hundredths (595.41) feet to a point of tangency, said straight line intersecting the said parallel lines, west of and distant twenty-four and eighty-seven hundredths (24.87) feet, from the extension to the north of the east line of Parcel One above described, at a point two hundred two and eighty-nine hundredths (202.89) feet, measured along a line which is parallel to the extension to the north of the east line of Parcel One above described, south of the said line which is parallel to, north of and distant one thousand two hundred twelve and forty-six hundredths (1,212.46) feet from the south line of said Section Seven (7); thence southwesterly along a curved line convex to the southeast, having a radius of four hundred seventy-seven and sixty-eight hundredths (477.68) feet, an arc distance of one hundred and eight tenths (100.8) feet, more or less, to a point in a straight line which is parallel to, north of and distant six hundred (600) feet from the south line of said Section Seven (7), measured along a line which is parallel to the east line of Parcel One above described; thence west along last described straight line a distance of three hundred thirty-seven and twenty-five hundredths (337.25) feet to an intersection with the line which is parallel to, west of and distant five hundred ninety (590) feet from the east line of Parcel One above described; thence north along last described parallel line a distance of three hundred sixty-four and forty-three hundredths (364.43) feet to the point of beginning; said parcel being in part all of Lots Number Two Hundred Thirty-nine (239) to Two Hundred Forty-three (243), both inclusive, and Two Hundred Seventy-eight (278) to Two Hundred Eighty-three (283), both inclusive, and part of Lots Number Two Hundred Thirty-seven (237), Two Hundred Thirty-eight (238), Two Hundred Forty-four (244), Two Hundred Seventy-seven (277), Two Hundred Eighty-four (284) and Two Hundred Eighty-five (285), and parts of Blaine Avenue, Hubbard Avenue and 16th Street and the alleys adjoining said lots and parts of lots, said Lots, Avenues, street and alleys being in that part of said Elliston Addition which was vacated by order entered September 12, 1907, in the Elkhart Superior Court, a certified copy of said order having been recorded December 12, 1907, in Record 116, page 53, of the records of the Recorder of Elkhart County, Indiana.

ALSO, Two (2) roadway easements for the purpose of vehicular and pedestrian ingress and egress to and from Parcel Two above described.

One easement being between Parcel One above described and Parcel

Two above described, over and along a strip of land twenty (20) feet in width, the center line of said strip intersecting the southeasterly line of Parcel Two above described at a point approximately four hundred twenty (420) feet southwesterly of the northeast corner of Parcel Two above described, measured along said southeasterly line, and extending at right angles from said southeasterly line a distance of approximately ninety-five (95) feet to an intersection with the west line of Parcel One above described at a point approximately seven hundred ninety (790) feet north of the south line of said Section Seven (7), measured along a line which is parallel to the east line of Parcel One above described.

The second easement being from Parcel Two to the present northwestern boundary line of Tract A to reach the northwest boundary line of Tract A, over and along a strip of land twenty (20) feet in width, the center line of said strip intersecting the southeasterly line of Parcel Two above described at a point approximately fifty (50) feet southwesterly of the northeast corner of said Parcel Two, measured along said southeasterly line, and extending at right angles from said southeasterly line a distance of approximately thirty-five (35) feet to the northwestern line of Tract A.

Vesting Deed

VOL 420 PAGE 295

DULY ENTERED FOR TAXATION
Dec. 16 1985
Myla J. Moore AUDITOR
5094

CASE NO. 67992

TO WHOM IT MAY CONCERN:

I HEREBY CERTIFY THAT BY THE AUTHORITY CONFERRED BY THE BOARD OF DIRECTORS OF CONSOLIDATED RAIL CORPORATION (CONRAIL) ON AUGUST 10, 1976 TO THE CHAIRMAN AND CHIEF EXECUTIVE OFFICER TO CONDUCT THE BUSINESS AND AFFAIRS OF THE CORPORATION AND TO DELEGATE SUCH AUTHORITY AS HE MAY DEEM NECESSARY, L. STANLEY CRANE AS SUCH CHAIRMAN AND CHIEF EXECUTIVE OFFICER DID DELEGATE TO THE ASSISTANT VICE PRESIDENT-REAL ESTATE THE AUTHORITY TO EXECUTE AND DELIVER ON BEHALF OF CONRAIL ANY AND ALL DOCUMENTS NECESSARY TO COMPLETE THE SALE OF PROPERTY SITUATE IN THE VICINITY OF LUSHER AVENUE IN ELKHART, ELKHART COUNTY, INDIANA CONTAINING 1.66 ACRES, MORE OR LESS, AND 1,078 LINEAL FEET OF TRACK, FOR THE TOTAL CONSIDERATION OF $20,800 (LAND - $16,600 AND TRACK - $4,200) TO STURGIS IRON AND METAL COMPANY, INC., OR THE NOMINEE THEREOF.

773235

Dec 16 8 38 AM '85
ELKHART COUNTY RECORDER
JOYCE M. ROWE
FILED FOR RECORD

J. D. McGIBBAN
Assistant Secretary

STURGIS IRON & METAL

THIS INDENTURE WITNESSETH, that **CONSOLIDATED RAIL CORPORATION**, a Corporation of the Commonwealth of Pennsylvania, whose mailing address is Six Penn Center Plaza, Philadelphia, Pennsylvania, 19103, hereinafter referred to as the Grantor, for and in consideration of the sum of TWENTY THOUSAND EIGHT HUNDRED DOLLARS ($20,800.00), to it paid, the receipt of which sum is hereby acknowledged, releases and quitclaims to **STURGIS IRON AND METAL COMPANY, INC.**, a Corporation of the State of Michigan, having a mailing address of 70675 Centerville Road, Sturgis, Michigan 49091, hereinafter referred to as the Grantee, all its right, title and interest of, in and to the following described premises:

ALL THAT CERTAIN piece or parcel of land, being a part of the Southeast Quarter of Section 7, Township 37 North, Range 5 East, situate in the City of Elkhart, County of Elkhart and State of Indiana, being more particularly bounded and described in accordance with a Plat of Survey prepared by John W. Weaver, R.P.E., R.L.S. No. 6695, dated June 14, 1985 and revised October 3, 1985; as follows:

BEGINNING at an iron stake found on the north line of Lusher Avenue, said iron stake being 3410.67 feet east of the west line of said section and said iron stake being the southeasterly corner of a parcel of land designated as "Tract VI" in the conveyance to Barbara M. Noble, et al. (Elkhart County Deed Record 353 Pages 632 and 633); thence North 0° 55' West, along the easterly line of said Noble, et al. land, 701.86 feet to an iron stake that is South 0° 55' East, 32.01 feet from an iron stake found at the northeasterly corner of said Noble, et al. land; thence North 27° 05' East, parallel with and 25 feet (measured at right angles) southeasterly from the centerline of a spur track (No. 230) of railroad of Consolidated Rail Corporation (formerly Penn Central Transportation Company) known as the Main Line Buffalo-Chicago and identified as Line Code 3200 in the records of the United States Railway Association, 220.52 feet to an iron stake on a curve which forms the westerly line of a tract of land designated as "Parcel 1" in the conveyance to Sturgis Iron & Metal Co., Inc., (Elkhart County Deed Record 415 page 743); thence southerly along the westerly line of said Sturgis Iron & Metal Co., Inc. land and along a curve bearing left, with a radius of 477.68 feet and a distance of 82.14 feet to an iron stake at the point of tangent of said curve; thence South 0° 57' East, along the westerly line of said Sturgis Iron & Metal Co., Inc. land, 736.20 feet to an iron stake found at a corner of said corporation's land; thence due west along a boundary of said Sturgis Iron & Metal Co., Inc. land 70 feet to an iron stake found at this point; thence South 0° 57' East, along the westerly line of said Sturgis Iron & Metal Co., Inc. land 100 feet to an iron stake found on the north line of said Lusher Avenue; thence due west along the north line of said Lusher Avenue 30 feet to the place of Beginning.

CONTAINING 1.66 acres, more or less.

BEING a part or portion of the same premises which Robert W. Blanchette, Richard C. Bond and John H. McArthur, as Trustees

of the Property of Penn Central Transportation Company, Debtor, by Conveyance Document No. PC-CRC-RP-72, dated March 30, 1976 and recorded on September 20, 1978 in the Recorder's Office of Elkhart County, Indiana, in Deed Book Volume 375 at page 170, granted and conveyed the aforesaid property unto Consolidated Rail Corporation.

SUBJECT, however, to any easements or agreements of record or otherwise affecting the land hereby conveyed, and to the state of facts which a personal inspection or accurate survey would disclose, and to any pipes, wires, poles, cables, culverts, drainage courses or systems and their appurtenances now existing and remaining in, on, under, over, across and through the herein conveyed premises, together with the right to maintain, repair, renew, replace, use and remove same.

THIS INSTRUMENT is executed and delivered by Grantor, and is accepted by Grantee, subject to the covenants set forth below, which shall be deemed part of the consideration of this conveyance and which shall run with the land and be binding upon, and inure to the benefit of, the respective personal representatives, successors and assigns of Grantor and Grantee. Grantee hereby knowingly, willingly, and voluntarily waives the benefit of any rule, law, custom, or statute of the State of Indiana now or hereafter in force with respect to the covenants set forth below.

(1) Grantor shall neither be liable or obligated to construct or maintain any fence or similar structure between the land hereinbefore described and adjoining land of Grantor nor shall Grantor be liable or obligated to pay for any part of the cost or expense of constructing or maintaining any fence or similar structure, and Grantee hereby forever releases Grantor from any loss or damage, direct or consequential, that may be caused by or arise from the lack or failure to maintain any such fence or similar structure.

(2) In the event the tracks or land of Grantor are elevated or depressed, or the grades of any streets, avenues, roads, lanes, highways or alleys over such railroad in the vicinity of the land hereinbefore described are changed so that they shall pass overhead or underneath such tracks or land, or in the event any grade crossing is vacated and closed, Grantee forever releases Grantor from all liability for any loss or damage, direct or consequential, caused by or arising from the separation or change of grades of such railroad or such streets, avenues, roads, lanes, highways, or alleys, or from the vacating and closing of any grade crossing.

(3) No right or means of ingress, egress or passageway to or from the land hereinbefore described is hereby granted, expressly or by implication, and Grantor shall not be liable or obliged to provide or obtain for Grantee such means of ingress, egress or passageway.

(4) Grantee hereby forever releases Grantor from all liability for any loss or damage, direct or consequential, to the land hereinbefore described and to any buildings or improvements now or hereafter erected thereon, and to the contents thereof, which may be caused by or arise from the normal operation, maintenance, repair, or renewal of Grantor's railroad, or which may be caused by or arise from vibration resulting from the normal operation, maintenance, repair or renewal thereof.

(5) Should a claim adverse to the title hereby quitclaimed be asserted and/or proved, no recourse shall be had against the Grantor herein.

(6) Grantee shall indemnify and defend Grantor against, and hold Grantor harmless from, all claims, actions, proceedings, judgments and awards, for death, injury, loss, or damage to any person or property, brought by any person, firm, corporation, or governmental entity, caused by, resulting to, arising from, or in connection with, the active or passive effects or existence of any physical substance of any nature or character, on, under, or in the land, water, air, structures, fixtures, or personal property comprising the land hereinbefore described, from and after the date of delivery of this deed.

THE words "Grantor" and "Grantee" used herein shall be construed as if they read "Grantors" and "Grantees", respectively, whenever the sense of this instrument so requires and whether singular or plural, such words shall be deemed to include in all cases the successors and assigns of the respective parties.

IN WITNESS WHEREOF, the said Grantor has caused this

Indenture to be executed by John F. Jaeger, its Assistant Vice President-Real Estate, and attested by J. D. McGEEHAN, its Assistant Secretary, this 6th day of December A. D. 1985.

SEALED and DELIVERED
In the presence of us:

Nancy B Basilio

CONSOLIDATED RAIL CORPORATION
By:

John F. Jaeger, Assistant
Vice President-Real Estate

ATTEST:

J. D. McGEEHAN, Assistant Secretary

COMMONWEALTH OF PENNSYLVANIA)
: ss
COUNTY OF PHILADELPHIA)

BEFORE ME, the undersigned, a Notary Public in and for said Commonwealth and County, personally appeared John F. Jaeger, as Assistant Vice President-Real Estate and J. D. McGEEHAN, as Assistant Secretary, respectively, of CONSOLIDATED RAIL CORPORATION, and severally acknowledged the execution of the foregoing instrument to be the voluntary act and deed of said CONSOLIDATED RAIL CORPORATION, and their voluntary act and deed as such officers.

WITNESS my hand and notarial seal, this 6th day of December A. D. 1985.

Notary Public

FRANCIS C. FLYNN, Notary Public, Philadelphia, Phila. Co.
My Commission Expires July 2, 1987

THIS INSTRUMENT PREPARED BY:

Nancy B. Basilio
Consolidated Rail Corporation
Ninth Floor, 1528 Walnut Street
Philadelphia, Pennsylvania 19102

:nls

Case No. 57312

VOL 420 PAGE 300

AFFIDAVIT

To: Recorders Office Elkhart County, Indiana

1. By deed dated December 6, 1985 Consolidated Rail Corporation, a corporation of the Commonwealth of Pennsylvania, with an office at Six Penn Center Plaza, Philadelphia, Pennsylvania 19103, conveyed certain of its property containing 1.66 acres situate north of Lusher Avenue in the City of Elkhart, Elkhart County, Indiana, more particularly described in said deed, to Sturgis Iron and Metal Company, Inc., with a mailing address of 70675 Centerville Road, Sturgis, Michigan 49091.

2. No Gross Indiana Income Tax is due and payable on this transaction pursuant to Section 1140.(a) Title II of the Regional Rail Reorganization Act of 1973 (45 U.S.C. 711 et seq.) as amended by Subpart B of Section 217 of the Northeast Rail Service Act of 1981 (H.R. 3982, Omnibus Budget Reconciliation Act of 1981, Subtitle B).

CONSOLIDATED RAIL CORPORATION
BY:

John P. Jaeger, Assistant
Vice President-Real Estate

Dated DEC 6 - 1985

PROMISSORY NOTE

$136,680.72 Dated: May 3, 1985

FOR VALUE RECEIVED, the undersigned, STURGIS IRON METAL CO., INC., a corporation organized and existing under the laws of the State of Michigan (hereinafter referred to as "Borrower") hereby promises to pay to the order of JAMES E. HURWICH, (hereinafter referred to as "Payee"), as hereinafter provided, the principal sum of One Hundred Thirty Six Thousand Six Hundred Eighty and 72/100 Dollars ($136,680.72), together with interest at the fixed per annum rate of 12 percent on all amounts remaining unpaid hereunder, to the extent permitted by law, from the date hereof until payment in full.

Payment shall be made in equal, successive annual installments of principal and interest due and payable in accord with the following schedule:

Date	Interest	Principal
May 3, 1986	16,401.69	28,598.31
May 3, 1987	12,969.89	32,030.11
May 3, 1988	9,126.28	35,873.72
May 3, 1989	4,821.43	40,178.58

Installment payments hereinabove provided shall be applied first to the payment of any unpaid interest, and the remainder to be applied on the unpaid principal hereof until the same is paid in full.

Principal, interest and costs are payable in lawful money of the United States of America to Payee at 1610 Circle Avenue, South Bend, Indiana, or at such other location as the Payee may designate to the Borrower in writing.

The Borrower may not prepay the within obligation in whole or in part.

This Note shall, at the option of the holder hereof, become immediately due and payable, without notice or demand, upon the happening of any one of the following events:

1. Failure to pay any amount as set forth herein when due;

2. Default in the performance of any other obligation of Borrower to the Payee;

3. The making by Borrower of a general assignment for the benefit of creditors; or

4. The filing of any petition or the commencement of any proceeding by or against the Borrower or any endorser or guarantor for any relief under any bankruptcy or insolvency laws, or any laws relating to the relief of debtors, readjustment of indebtedness, reorganizations, compositions or extensions.

Borrower hereby unconditionally waives diligence, presentment, protest, demand for payment, notice of dishonor, notice of default and any or all notices or demands regarding delivery, acceptance, performance, default, enforcement, or otherwise in connection with this Note. All amounts payable hereunder are payable without relief from valuation and appraisement laws.

In the event holder shall institute any action for the collection of the monies due hereunder, Borrower shall be liable, in addition to amounts due, for all costs and expenses, including attorneys' fees with regard to such collection.

If Payee has not paid off the entire balance of the mortgage from Payee to Joseph P. Goldman (dated March 8, 1978 and recorded March 9, 1978 in Mortgage Record 453, page 196 of the records of Elkhart County, Indiana) on or before July 3, 1985, Borrower is authorized to do so and offset such payment against the payments due on the Note on May 3, 1986 and May 3, 1987.

STURGIS IRON & METAL CO., INC.

[SEAL]

BY: Ralph Levin
Ralph Levin

Its President

ATTEST:

BY: Delmer Richmond
Delmer Richmond

Its Secretary

AGREEMENT FOR PURCHASE AND SALE OF ASSETS

THIS AGREEMENT, made and entered into this 3rd day of May, 1985, by and between ELKHART METALS CORP., an Indiana Corporation, hereinafter referred to as "SELLER", and STURGIS IRON & METAL CO., INC., a Michigan Corporation, (or its successors or assigns), hereinafter referred to as "PURCHASER".

WITNESSETH:

WHEREAS, SELLER is the owner of a scrap metal business together with such equipment, materials, furnishings, supplies and fixtures as are necessary for the operation of such business and various other assets used in said business; and

WHEREAS, SELLER desires to sell a portion of the aforementioned assets, both tangible and intangible, a complete list of which portion is attached hereto, made a part hereof and designated as Exhibit "A"; and

WHEREAS, PURCHASER desires to purchase the property listed in Exhibit "A"; and

WHEREAS, both SELLER and PURCHASER desire that the terms and conditions of the aforementioned sale and purchase shall be contained herein.

NOW, THEREFORE, in consideration of the premises, the mutual covenants and promises of the parties hereinafter set forth and other good and valuable consideration, the parties hereto do hereby agree as follows:

ARTICLE I

SUBJECT MATTER OF PURCHASE AND SALE

Subject to the terms and conditions set forth in this Agreement, SELLER does hereby agree to sell and deliver and hereby sells and delivers to PURCHASER and PURCHASER does hereby agree to purchase and acquire and hereby purchases and acquires from SELLER all those items enumerated in that document which is attached hereto, made a part hereof and designated as Exhibit "A", free and clear of any liens and encumbrances of whatever nature except as specifically provided for herein. It is expressly agreed and understood that none of SELLER's accounts receivable, accounts payable, nor any other contract rights or intangible property are or shall be conveyed to PURCHASER hereunder except as expressly set forth in Exhibit "A." PURCHASER assumes no liabilities of SELLER except as may be set forth herein.

ARTICLE II

CONSIDERATION AND PAYMENT OF PURCHASE PRICE

In consideration of the sale and delivery of all those assets set forth in Exhibit "A", PURCHASER shall pay the following amounts:

Asset	Purchase Price
One (1) Scale, One (1) 500-Ton Richards Shear, and One (1) Press (Galon-Heney)	$ 68,634.94
All Customer Lists and Right to use Corporate Name, "Elkhart Metals Corp." in Indiana	$233,358.79
Covenant Not To Compete	$ 807.47
TOTAL	$302,801.20

Payment of the purchase price shall be made in cash due and payable at the Closing (as hereinafter defined) in the amount of $75,000, plus a promissory note bearing interest at a fixed per annum rate of 12% executed by PURCHASER payable to SELLER or SELLER's successors and assigns, delivered at the Closing, in the principal amount of $227,801.20 payable in four equal annual installments of principal and interest of $75,000 per installment on May 3, 1986, May 3, 1987, May 3, 1988 and May 3, 1989.

ARTICLE III

CLOSING

The closing ("Closing") of the transaction provided for in this Agreement shall be held on May 3, 1985 at 10:00 A.M. (the Closing Date) at the offices of Barnes & Thornburg. The Closing Date may be extended as provided hereinbelow, or by mutual agreement between the parties hereto by an instrument in writing amending this Agreement.

At the Closing, the parties hereto shall execute and deliver all documents and instruments necessary to effect the transfer of the assets set forth in Exhibit "A". At the Closing and at any time or times thereafter at the request of PURCHASER, SELLER, or its successors and assigns, shall execute such documents and take such further action to transfer title and right to the assets set forth in Exhibit "A" to PURCHASER.

ARTICLE IV

REPRESENTATIONS AND WARRANTIES OF SELLER

SELLER hereby covenants, represents and warrants to PURCHASER, and PURCHASER hereby relies upon said covenants,

representations and warranties in the consummation of this Agreement, as follows:

A. TITLE TO ASSETS: SELLER has on the Closing Date full, valid, good and marketable title to all of the assets set forth in Exhibit "A". Said assets on the Closing Date are free from any and all obligations, liabilities, debts and encumbrances of any sort whatsoever, whether direct or indirect, fixed or contingent. There is not now pending, nor is there threatened, before any municipal, governmental or regulatory agency, or any court whatsoever, any suit or proceeding against SELLER materially affecting the title to the assets or the ability of SELLER to continue to use the assets in their present use at their present locations which are set forth in Exhibit "A", nor has SELLER received notice from any party threatening to commence any such suit or proceeding.

B. AUTHORITY FOR SALE: SELLER has the full legal capacity and authority to enter into this Agreement and to sell and deliver to PURCHASER the assets set forth in Exhibit "A". The appropriate Board of Directors' and Shareholders' approval of the disposition of the assets and the transactions contemplated by this Agreement has been completed by SELLER before the Closing Date in compliance with Article 1, Chapter 6 of the Indiana Business Corporation Act or as otherwise or additionally required by law or regulation.

C. CORPORATE EXISTENCE AND GOOD STANDING: SELLER is a corporation, duly organized, validly existing and in good

standing under the laws of the State of Indiana, being the state of its principal place of business and incorporation. SELLER has all corporate power necessary to own those properties which are set forth in Exhibit "A" and to carry on its business as the same is now being conducted.

D. OTHER OPTIONS: There are no other outstanding options, contracts or commitments for the purchase of the assets set forth in Exhibit "A" with any individual, partnership, corporation or other form of entity whatsoever.

E. TAXES: SELLER will pay all personal property taxes with respect to the property set forth in Exhibit "A" which accrue in calendar year 1985.

F. CONDITION OF ASSETS: PURCHASER is purchasing and acquiring the assets set forth in Exhibit "A" "AS IS." Other than the SELLER's warranty in Article IV, Section A hereof with respect to title to such assets, the sale to PURCHASER by SELLER of such assets is made "as is - where is" and is made without any further representations or warranties.

> SELLER MAKES NO WARRANTY OF MERCHANTABILITY OR FITNESS OF THE PROPERTY FOR ANY PARTICULAR PURPOSE.
>
> NO EXPRESS OR IMPLIED WARRANTIES HAVE BEEN MADE BY SELLER WITH REFERENCE TO THE PROPERTY, AND THERE ARE NO WARRANTIES WHICH EXTEND BEYOND THE DESCRIPTION ON THE FACE HEREOF.
>
> PURCHASER HAS HAD REASONABLE OPPORTUNITY TO INSPECT THE PROPERTY AND ACCEPTS THE PROPERTY "AS IS - WHERE IS" WITH ANY AND ALL FAULTS.

PURCHASER has inspected the equipment set forth in Exhibit "A".

G. EXCLUSIVE RIGHT TO NAME: SELLER is the sole entity which has legal right and authority to use the corporate name ELKHART METALS CORP. in the State of Indiana, and has full right, title and authority to transfer the exclusive right to use said name in the State of Indiana to PURCHASER.

H. COMPLIANCE WITH LAWS AND REGULATIONS: SELLER has complied with all aspects of applicable federal, state and local laws and regulations in the conduct of its business. SELLER has received no notice from any governmental entity of any violation of any applicable laws, orders, or regulations of the federal, state, or local government or of any agencies thereof including but not limited to violations of the laws and regulations known as OSHA and MIOSHA, and federal and state environmental laws.

I. OPERATION OF BUSINESS: There is presently no fact or condition known to SELLER which will prohibit PURCHASER from operating the business in substantially the same manner as SELLER.

J. BROKER'S FEES: All negotiations relative to this Agreement and the transactions contemplated herein have been carried on by the SELLER directly with the PURCHASER and without any intervention of any other person and SELLER does hereby agree to hold PURCHASER harmless from any claim of any broker or person for a finder's fee, brokerage commission or other like payment arising from such finder or broker having been engaged by or on behalf of SELLER.

The warranties of SELLER set forth in this ARTICLE IV are true as of the Closing Date and shall survive the Closing Date, continuing in full force and effect thereafter, notwithstanding the final closing of this transaction.

SELLER expressly makes no covenant, representation, or warranty with respect to whether its customers, or any of them, on the Customer List being purchased and sold hereby can or will agree to do business with PURCHASER, and SELLER expressly does not undertake any obligation to assist PURCHASER in this regard.

ARTICLE V

REPRESENTATIONS AND WARRANTIES OF PURCHASER

PURCHASER hereby covenants, represents and warrants to SELLER, and SELLER hereby relies upon said covenants, representations and warrants in the consummation of this Agreement, as follows:

A. CORPORATE EXISTENCE AND GOOD STANDING: PURCHASER is a corporation, duly organized, validly existing and in good standing of the laws of the State of Michigan, being the state of its incorporation. PURCHASER has all corporate power to enter into and perform this Agreement and to purchase the assets which are set forth in Exhibit "A."

B. CORPORATE AUTHORITY: The execution, delivery and performance of this Agreement by PURCHASER has been duly and effectively authorized by its Board of Directors and no further corporate action is necessary on the part of PURCHASER in accordance with all the terms contained herein.

C. NO VIOLATION OF AGREEMENT: As of the Closing Date, the execution, delivery and performance of this Agreement and the consummation of the transactions contemplated hereby will not violate any agreement or undertaking to which PURCHASER is a party.

D. CONDITION OF ASSETS: PURCHASER is purchasing and acquiring the assets set forth in Exhibit "A" "AS IS." Other than the SELLER's warranty in Article IV, Section A hereof with respect to title to such assets, the sale to PURCHASER by SELLER of such assets is made "as is - where is" and is made without any further representations or warranties.

> SELLER MAKES NO WARRANTY OF MERCHANTABILITY OR FITNESS OF THE PROPERTY FOR ANY PARTICULAR PURPOSE.
>
> NO EXPRESS OR IMPLIED WARRANTIES HAVE BEEN MADE BY SELLER WITH REFERENCE TO THE PROPERTY, AND THERE ARE NO WARRANTIES WHICH EXTEND BEYOND THE DESCRIPTION ON THE FACE HEREOF.
>
> PURCHASER HAS HAD REASONABLE OPPORTUNITY TO INSPECT THE PROPERTY AND ACCEPTS THE PROPERTY "AS IS - WHERE IS" WITH ANY AND ALL FAULTS.

PURCHASER has inspected the equipment set forth in Exhibit "A."

E. BROKER'S OR FINDER'S FEES: All negotiations regarding this Agreement and the transactions provided hereby have been carried on by PURCHASER directly with SELLER without the involvement or participation of any other person on behalf of PURCHASER, and PURCHASER does hereby agree to hold SELLER harmless from any claim of any broker or person for a finder's

fee, brokerage commission or other like payment arising from such finder or broker having been engaged by or on behalf of PURCHASER.

The warranties of PURCHASER set forth in this ARTICLE V are true as of the Closing Date, and shall survive the Closing Date, continuing in full force and effect thereafter, notwithstanding the final closing of this transaction.

ARTICLE VI

NO COMPETITION

It is hereby agreed that for and in consideration of the portion of the purchase price paid by PURCHASER as set forth in Article II hereof, and other good and valuable consideration, SELLER and each shareholder of SELLER shall execute and deliver to PURCHASER at the Closing a non-competition agreement in the same form as set forth in Exhibit "B," attached hereto and made a part hereof.

ARTICLE VII

NAME

PURCHASER shall acquire, as one (1) of the assets purchased hereunder, all right, title and exclusive authority to use the corporate name ELKHART METALS CORP. in Indiana.

ARTICLE VIII

INSTRUMENTS OF TRANSFER AND CLOSING DOCUMENTS

At the Closing, SELLER shall deliver to PURCHASER all instruments and documents reasonably necessary for the transfer to PURCHASER of the assets set forth in Exhibit "A," including the following:

A. A general Bill of Sale conveying all of the property and assets set forth in Exhibit "A," free from all claims, liens and encumbrances.

B. A written consent to PURCHASER to use the name of ELKHART METALS CORP. in any corporate name which may thereafter be filed by, or on behalf of, PURCHASER in the State of Indiana.

C. A Covenant Not To Compete in the form set forth in Exhibit "B".

D. Such other instruments of sale and assignment as may be necessary to effectuate the sale and transfer contemplated by this Agreement.

ARTICLE IX

MISCELLANEOUS

This Agreement, including the exhibits and schedules attached hereto, constitutes the entire agreement between the parties with respect to this transaction for the acquisition of the assets set forth in Exhibit "A", except as herein stated, and contains all of the representations and warranties of the respective parties.

This Agreement shall inure to the benefit of and be binding upon the parties hereto, their successors, heirs and legatees.

This Agreement may not be assigned by operation of law or otherwise.

The Agreement may be executed in counterparts, each of which shall be deemed an original.

This Agreement shall be construed and enforced in accordance with the laws of the State of Indiana.

If any provision or provisions or portion thereof in this Agreement shall for any reason be determined to be invalid or unenforceable, the balance of such provision and the remaining provisions of this Agreement shall nevertheless continue to be valid and enforceable as though the invalid or unenforceable provision had not been a part hereof.

The title of the sections and subsections of this Agreement are for convenience of reference only and are not to be considered in construing this Agreement.

IN WITNESS WHEREOF, we have hereunto set our hands and seals the day and year first above written.

ELKHART METALS CORP.

By _____
James E. Hurwich
Its President

[SEAL]

Attest:

By _____
Morton M. Dobbins
Its Secretary

STURGIS IRON & METAL CO., INC.

By _____
Ralph Levin
Its President

[SEAL]

Attest:

By _____
Delmer Richmond
Its Secretary

EXHIBIT A

One (1) Scale

One (1) 500-Ton Richards Shear

One (1) Press (Galon-Heney)

All Customer Lists and Right to use Corporate Name, "Elkhart Metals Corp." in Indiana
Covenant Not To Compete

AGREEMENT FOR PURCHASE AND SALE OF ASSETS

THIS AGREEMENT, made and entered into this 3rd day of May, 1985, by and between INDUSTRIAL PLANT SERVICE, INC., an Indiana Corporation sometimes operating under the assumed business name "IPS", hereinafter referred to as "SELLER", and STURGIS IRON & METAL CO., INC., a Michigan Corporation, (or its successors or assigns), hereinafter referred to as "PURCHASER".

WITNESSETH:

WHEREAS, SELLER is the owner of an industrial scrap hauling and trash hauling business together with such equipment, materials, furnishings, supplies and fixtures as are necessary for the operation of such business and various other assets used in said business; and

WHEREAS, SELLER desires to sell a portion of the aforementioned assets, both tangible and intangible, a complete list of which portion is attached hereto, made a part hereof and designated as Exhibit "A"; and

WHEREAS, PURCHASER desires to purchase the property listed in Exhibit "A"; and

WHEREAS, both SELLER and PURCHASER desire that the terms and conditions of the aforementioned sale and purchase shall be contained herein.

NOW, THEREFORE, in consideration of the premises, the mutual covenants and promises of the parties hereinafter set forth and other good and valuable consideration, the parties hereto do hereby agree as follows:

ARTICLE I

SUBJECT MATTER OF PURCHASE AND SALE

Subject to the terms and conditions set forth in this Agreement, SELLER does hereby agree to sell and deliver and hereby sells and delivers to PURCHASER and PURCHASER does hereby agree to purchase and acquire and hereby purchases and acquires from SELLER all those items enumerated in that document which is attached hereto, made a part hereof and designated as Exhibit "A", free and clear of any liens and encumbrances of whatever nature except as specifically provided for herein. It is expressly agreed and understood that none of SELLER's accounts receivable, accounts payable, nor any other contract rights or intangible property are or shall be conveyed to PURCHASER hereunder except as expressly set forth in Exhibit "A." PURCHASER assumes no liabilities of SELLER except as may be set forth herein.

ARTICLE II

CONSIDERATION AND PAYMENT OF PURCHASE PRICE

In consideration of the sale and delivery of all those assets set forth in Exhibit "A", PURCHASER shall pay the following amounts:

Asset	Purchase Price
One Thousand (1,000) lugger and roll off containers, including those located at customer sites, Twenty (20) Trucks, and Ten (10) or more Compactors	$ 59,752.77

All Customer Lists and Right to use Corporate Name, "Industrial Plant Service, Inc." in Indiana	$242,240.96
Covenant Not To Compete	$ 807.47
TOTAL	$302,801.20

Payment of the purchase price shall be made in cash due and payable at the Closing (as hereinafter defined) in the amount of $75,000, plus a promissory note bearing interest at a fixed per annum rate of 12% executed by PURCHASER payable to SELLER or SELLER's successors and assigns, delivered at the Closing, in the principal amount of $227,801.20 payable in four equal annual installments of principal and interest of $75,000 per installment on May 3, 1986, May 3, 1987, May 3, 1988 and May 3, 1989.

ARTICLE III

CLOSING

The closing ("Closing") of the transaction provided for in this Agreement shall be held on May 3, 1985 at 10:00 A.M. (the Closing Date) at the offices of Barnes & Thornburg. The Closing Date may be extended as provided hereinbelow, or by mutual agreement between the parties hereto by an instrument in writing amending this Agreement.

At the Closing, the parties hereto shall execute and deliver all documents and instruments necessary to effect the transfer of the assets set forth in Exhibit "A". At the Closing and at any time or times thereafter at the request of PURCHASER, SELLER, or its successors and assigns, shall execute

such documents and take such further action to transfer title and right to the assets set forth in Exhibit "A" to PURCHASER.

ARTICLE IV

REPRESENTATIONS AND WARRANTIES OF SELLER

SELLER hereby covenants, represents and warrants to PURCHASER, and PURCHASER hereby relies upon said covenants, representations and warranties in the consummation of this Agreement, as follows:

A. TITLE TO ASSETS: SELLER has on the Closing Date full, valid, good and marketable title to all of the assets set forth in Exhibit "A". Said assets on the Closing Date are free from any and all obligations, liabilities, debts and encumbrances of any sort whatsoever, whether direct or indirect, fixed or contingent. There is not now pending, nor is there threatened, before any municipal, governmental or regulatory agency, or any court whatsoever, any suit or proceeding against SELLER materially affecting the title to the assets or the ability of SELLER to continue to use the assets in their present use at their present locations which are set forth in Exhibit "A", nor has SELLER received notice from any party threatening to commence any such suit or proceeding.

B. AUTHORITY FOR SALE: SELLER has the full legal capacity and authority to enter into this Agreement and to sell and deliver to PURCHASER the assets set forth in Exhibit "A". The appropriate Board of Directors' and Shareholders' approval of the disposition of the assets and the transactions contem-

plated by this Agreement has been completed by SELLER before the Closing Date in compliance with Article 1, Chapter 6 of the Indiana Business Corporation Act or as otherwise or additionally required by law or regulation.

C. CORPORATE EXISTENCE AND GOOD STANDING: SELLER is a corporation, duly organized, validly existing and in good standing under the laws of the State of Indiana, being the state of its principal place of business and incorporation. SELLER has all corporate power necessary to own those properties which are set forth in Exhibit "A" and to carry on its business as the same is now being conducted.

D. OTHER OPTIONS: There are no other outstanding options, contracts or commitments for the purchase of the assets set forth in Exhibit "A" with any individual, partnership, corporation or other form of entity whatsoever.

E. TAXES: SELLER will pay all personal property taxes with respect to the property set forth in Exhibit "A" which accrue in calendar year 1985.

F. CONDITION OF ASSETS: PURCHASER is purchasing and acquiring the assets set forth in Exhibit "A" "AS IS," except for the twenty (20) trucks, which SELLER warrants to be in "running condition." Other than the SELLER's warranty in Article IV, Section A hereof with respect to title to such assets, and except with respect to SELLER's warranty in the preceding sentence as to trucks, the sale to PURCHASER by SELLER of such assets is made "as is - where is" and is made without any further representations or warranties.

SELLER MAKES NO WARRANTY OF MERCHANTABILITY OR FITNESS OF THE PROPERTY FOR ANY PARTICULAR PURPOSE.

NO EXPRESS OR IMPLIED WARRANTIES HAVE BEEN MADE BY SELLER WITH REFERENCE TO THE PROPERTY, AND THERE ARE NO WARRANTIES WHICH EXTEND BEYOND THE DESCRIPTION ON THE FACE HEREOF.

PURCHASER HAS HAD REASONABLE OPPORTUNITY TO INSPECT THE PROPERTY AND ACCEPTS THE PROPERTY "AS IS - WHERE IS" WITH ANY AND ALL FAULTS.

PURCHASER has inspected the equipment set forth in Exhibit "A".

G. EXCLUSIVE RIGHT TO NAME: SELLER is the sole entity which has legal right and authority to use the corporate name INDUSTRIAL PLANT SERVICE, INC. in the State of Indiana, and has full right, title and authority to transfer the exclusive right to use said name in the State of Indiana to PURCHASER.

H. COMPLIANCE WITH LAWS AND REGULATIONS: SELLER has complied with all aspects of applicable federal, state and local laws and regulations in the conduct of its business. SELLER has received no notice from any governmental entity of any violation of any applicable laws, orders, or regulations of the federal, state, or local government or of any agencies thereof including but not limited to violations of the laws and regulations known as OSHA and MIOSHA, and federal and state environmental laws.

I. OPERATION OF BUSINESS: There is presently no fact or condition known to SELLER which will prohibit PURCHASER from

operating the business in substantially the same manner as SELLER.

J. BROKER'S FEES: All negotiations relative to this Agreement and the transactions contemplated herein have been carried on by the SELLER directly with the PURCHASER and without any intervention of any other person and SELLER does hereby agree to hold PURCHASER harmless from any claim of any broker or person for a finder's fee, brokerage commission or other like payment arising from such finder or broker having been engaged by or in behalf of SELLER.

The warranties of SELLER set forth in this ARTICLE IV are true as of the Closing Date and shall survive the Closing Date, continuing in full force and effect thereafter, notwithstanding the final closing of this transaction.

SELLER expressly makes no covenant, representation, or warranty with respect to whether its customers, or any of them, on the Customer List being purchased and sold hereby can or will agree to do business with PURCHASER, and SELLER expressly does not undertake any obligation to assist PURCHASER in this regard.

ARTICLE V

REPRESENTATIONS AND WARRANTIES OF PURCHASER

PURCHASER hereby covenants, represents and warrants to SELLER, and SELLER hereby relies upon said covenants, representations and warrants in the consummation of this Agreement, as follows:

A. CORPORATE EXISTENCE AND GOOD STANDING: PURCHASER is a corporation, duly organized, validly existing and in good standing of the laws of the State of Michigan, being the state of its incorporation. PURCHASER has all corporate power to enter into and perform this Agreement and to purchase the assets which are set forth in Exhibit "A."

B. CORPORATE AUTHORITY: The execution, delivery and performance of this Agreement by PURCHASER has been duly and effectively authorized by its Board of Directors and no further corporate action is necessary on the part of PURCHASER in accordance with all the terms contained herein.

C. NO VIOLATION OF AGREEMENT: As of the Closing Date, the execution, delivery and performance of this Agreement and the consummation of the transactions contemplated hereby will not violate any agreement or undertaking to which PURCHASER is a party.

D. CONDITION OF ASSETS: PURCHASER is purchasing and acquiring the assets set forth in Exhibit "A" "AS IS," except for the twenty (20) trucks which SELLER warrants to be in "running condition." Other than the SELLER's warranty in Article IV, Section A hereof with respect to title to such assets, and except with respect to SELLER's warranty in the preceding sentence as to trucks, the sale to PURCHASER by SELLER of such assets is made "as is - where is" and is made without any further representations or warranties.

SELLER MAKES NO WARRANTY OF MERCHANTABILITY OR FITNESS OF THE PROPERTY FOR ANY PARTICULAR PURPOSE.

NO EXPRESS OR IMPLIED WARRANTIES HAVE BEEN MADE BY SELLER WITH REFERENCE TO THE PROPERTY, AND THERE ARE NO WARRANTIES WHICH EXTEND BEYOND THE DESCRIPTION ON THE FACE HEREOF.

PURCHASER HAS HAD REASONABLE OPPORTUNITY TO INSPECT THE PROPERTY AND ACCEPTS THE PROPERTY "AS IS - WHERE IS" WITH ANY AND ALL FAULTS.

PURCHASER has inspected the equipment set forth in Exhibit "A."

E. BROKER'S OR FINDER'S FEES: All negotiations regarding this Agreement and the transactions provided hereby have been carried on by PURCHASER directly with SELLER without the involvement or participation of any other person on behalf of PURCHASER, and PURCHASER does hereby agree to hold SELLER harmless from any claim of any broker or person for a finder's fee, brokerage commission or other like payment arising from such finder or broker having been engaged by or on behalf of PURCHASER.

The warranties of PURCHASER set forth in this ARTICLE V are true as of the Closing Date, and shall survive the Closing Date, continuing in full force and effect thereafter, notwithstanding the final closing of this transaction.

ARTICLE VI

NO COMPETITION

It is hereby agreed that for and in consideration of the portion of the purchase price paid by PURCHASER as set forth in Article II hereof, and other good and valuable consideration, SELLER and each shareholder of SELLER shall execute

and deliver to PURCHASER at the Closing a non-competition agreement in the same form as set forth in Exhibit "B," attached hereto and made a part hereof.

ARTICLE VII

NAME

PURCHASER shall acquire, as one (1) of the assets purchased hereunder, all right, title and exclusive authority to use the corporate name INDUSTRIAL PLANT SERVICE, INC. in Indiana.

ARTICLE VIII

INSTRUMENTS OF TRANSFER AND CLOSING DOCUMENTS

At the Closing, SELLER shall deliver to PURCHASER all instruments and documents reasonably necessary for the transfer to PURCHASER of the assets set forth in Exhibit "A," including the following:

A. A general Bill of Sale conveying all of the property and assets set forth in Exhibit "A," free from all claims, liens and encumbrances.

B. A written consent to PURCHASER to use the name INDUSTRIAL PLANT SERVICE, INC. in any corporate name which may thereafter be filed by, or on behalf of, PURCHASER in the State of Indiana.

C. A Covenant Not To Compete in the form set forth in Exhibit "B".

D. Separate assignments in statutory or other required forms of any and all automobiles, trucks or other licensed vehicles sold hereunder.

E. Such other instruments of sale and assignment as may be necessary to effectuate the sale and transfer contemplated by this Agreement.

ARTICLE IX

MISCELLANEOUS

This Agreement, including the exhibits and schedules attached hereto, constitutes the entire agreement between the parties with respect to this transaction for the acquisition of the assets set forth in Exhibit "A", except as herein stated, and contains all of the representations and warranties of the respective parties.

This Agreement shall inure to the benefit of and be binding upon the parties hereto, their successors, heirs and legatees.

This Agreement may not be assigned by operation of law or otherwise.

The Agreement may be executed in counterparts, each of which shall be deemed an original.

This Agreement shall be construed and enforced in accordance with the laws of the State of Indiana.

If any provision or provisions or portion thereof in this Agreement shall for any reason be determined to be invalid or unenforceable, the balance of such provision and the remaining provisions of this Agreement shall nevertheless continue to be valid and enforceable as though the invalid or unenforceable provision had not been a part hereof.

The title of the sections and subsections of this Agreement are for convenience of reference only and are not to be considered in construing this Agreement.

IN WITNESS WHEREOF, we have hereunto set our hands and seals the day and year first above written.

INDUSTRIAL PLANT SERVICE, INC.

By _____
James E. Hurwich
Its President

[SEAL]

Attest:

By _____
Morton M. Dobbins
Its Secretary

STURGIS IRON & METAL CO., INC.

By _____
Ralph Levin
Its President

[SEAL]

Attest:

By _____
Delmer Richmond
Its Secretary

EXHIBIT A

One Thousand (1,000) lugger and roll off containers, including those located at customer sites

Twenty (20) Trucks

Ten (10) or more Compactors

All Customer Lists and Right to use Corporate Name, "Industrial Plant Service, Inc." in Indiana

Covenant Not To Compete

PROMISSORY NOTE

$227,801.20 Dated: May 3, 1985

FOR VALUE RECEIVED, the undersigned, STURGIS IRON METAL CO., INC., a corporation organized and existing under the laws of the State of Michigan (hereinafter referred to as "Borrower") hereby promises to pay to the order of ELKHART METALS CORP., an Indiana Corporation (hereinafter referred to as "Company") or its successors and assigns (together with Company hereinafter referred to as "Noteholder"), as hereinafter provided, the principal sum of Two Hundred Twenty Seven Thousand Eight Hundred One and 20/100 Dollars ($227,801.20), together with interest at the fixed per annum rate of 12 percent on all amounts remaining unpaid hereunder, to the extent permitted by law, from the date hereof until payment in full.

Payment shall be made in equal, successive annual installments of principal and interest due and payable in accord with the following schedule:

Date	Interest	Principal
May 3, 1986	27,336.14	47,663.86
May 3, 1987	21,616.48	53,383.52
May 3, 1988	15,210.46	59,789.54
May 3, 1989	8,035.71	66,964.28

Installment payments hereinabove provided shall be applied first to the payment of any unpaid interest, and the remainder to be applied on the unpaid principal hereof until the same is paid in full.

Principal, interest and costs are payable in lawful money of the United States of America to Noteholder at its principal place of business in Elkhart County, Indiana or at such other location as the Noteholder may designate to the Borrower in writing.

The Borrower may not prepay the within obligation in whole or in part.

This Note shall, at the option of the holder hereof, become immediately due and payable, without notice or demand, upon the happening of any one of the following events:

1. Failure to pay any amount as set forth herein when due;

2. Breach by the Borrower under the Agreement for Purchase and Sale of Assets (the "Agreement") between the Company and Borrower of even date here-

with, or if any covenant, representation or warranty by Borrower in the Agreement proves untrue in any material respect;

3. Default in the performance of any other obligation of Borrower to the Noteholder;

4. The making by Borrower of a general assignment for the benefit of creditors; or

5. The filing of any petition or the commencement of any proceeding by or against the Borrower or any endorser or guarantor for any relief under any bankruptcy or insolvency laws, or any laws relating to the relief of debtors, readjustment of indebtedness, reorganizations, compositions or extensions.

Borrower hereby unconditionally waives diligence, presentment, protest, demand for payment, notice of dishonor, notice of default and any or all notices or demands regarding delivery, acceptance, performance, default, enforcement, or otherwise in connection with this Note. All amounts payable hereunder are payable without relief from valuation and appraisement laws.

In the event holder shall institute any action for the collection of the monies due hereunder, Borrower shall be liable, in addition to amounts due, for all costs and expenses, including attorneys' fees with regard to such collection.

STURGIS IRON & METAL CO., INC.

[SEAL]

BY: Ralph Levin
Ralph Levin

Its President

ATTEST:

BY: Delmer Richmond
Delmer Richmond

Its Secretary

PROMISSORY NOTE

$227,801.20 Dated: May 3, 1985

FOR VALUE RECEIVED, the undersigned, STURGIS IRON METAL CO., INC., a corporation organized and existing under the laws of the State of Michigan (hereinafter referred to as "Borrower") hereby promises to pay to the order of INDUSTRIAL PLANT SERVICE, INC., an Indiana Corporation (hereinafter referred to as "Company") or its successors and assigns (together with Company hereinafter referred to as "Noteholder"), as hereinafter provided, the principal sum of Two Hundred Twenty Seven Thousand Eight Hundred One and 20/100 Dollars ($227,801.20), together with interest at the fixed per annum rate of 12 percent on all amounts remaining unpaid hereunder, to the extent permitted by law, from the date hereof until payment in full.

Payment shall be made in equal, successive annual installments of principal and interest due and payable in accord with the following schedule:

Date	Interest	Principal
May 3, 1986	27,336.14	47,663.86
May 3, 1987	21,616.48	53,383.52
May 3, 1988	15,210.46	59,789.54
May 3, 1989	8,035.71	66,964.28

Installment payments hereinabove provided shall be applied first to the payment of any unpaid interest, and the remainder to be applied on the unpaid principal hereof until the same is paid in full.

Principal, interest and costs are payable in lawful money of the United States of America to Noteholder at its principal place of business in Elkhart County, Indiana or at such other location as the Noteholder may designate to the Borrower in writing.

The Borrower may not prepay the within obligation in whole or in part.

This Note shall, at the option of the holder hereof, become immediately due and payable, without notice or demand, upon the happening of any one of the following events:

1. Failure to pay any amount as set forth herein when due;

2. Breach by the Borrower under the Agreement for Purchase and Sale of Assets (the "Agreement") between the Noteholder and Borrower of even date here-

with, or if any covenant, representation or warranty by Borrower in the Agreement proves untrue in any material respect;

3. Default in the performance of any other obligation of Borrower to the Noteholder;

4. The making by Borrower of a general assignment for the benefit of creditors; or

5. The filing of any petition or the commencement of any proceeding by or against the Borrower or any endorser or guarantor for any relief under any bankruptcy or insolvency laws, or any laws relating to the relief of debtors, readjustment of indebtedness, reorganizations, compositions or extensions.

Borrower hereby unconditionally waives diligence, presentment, protest, demand for payment, notice of dishonor, notice of default and any or all notices or demands regarding delivery, acceptance, performance, default, enforcement, or otherwise in connection with this Note. All amounts payable hereunder are payable without relief from valuation and appraisement laws.

In the event holder shall institute any action for the collection of the monies due hereunder, Borrower shall be liable, in addition to amounts due, for all costs and expenses, including attorneys' fees with regard to such collection.

STURGIS IRON & METAL CO., INC.

[SEAL]

BY: Ralph Levin
Ralph Levin

Its President

ATTEST:

BY: Delmer Richmond
Delmer Richmond

Its Secretary

PROMISSORY NOTE

$15,186.75 Dated: May 3, 1985

FOR VALUE RECEIVED, the undersigned, STURGIS IRON METAL CO., INC., a corporation organized and existing under the laws of the State of Michigan (hereinafter referred to as "Borrower") hereby promises to pay to the order of THE 1610 CORPORATION, an Indiana Corporation (hereinafter referred to as "Company") or its successors and assigns (together with Company hereinafter referred to as "Noteholder"), as hereinafter provided, the principal sum of Fifteen Thousand One Hundred Eighty Six and 75/100 Dollars ($15,186.75), together with interest at the fixed per annum rate of 12 percent on all amounts remaining unpaid hereunder, to the extent permitted by law, from the date hereof until payment in full.

Payment shall be made in equal, successive annual installments of principal and interest due and payable in accord with the following schedule:

Date	Interest	Principal
May 3, 1986	1,822.41	3,177.59
May 3, 1987	1,441.10	3,558.90
May 3, 1988	1,014.03	3,985.97
May 3, 1989	535.71	4,464.29

Installment payments hereinabove provided shall be applied first to the payment of any unpaid interest, and the remainder to be applied on the unpaid principal hereof until the same is paid in full.

Principal, interest and costs are payable in lawful money of the United States of America to Noteholder at its principal place of business in Elkhart County, Indiana or at such other location as the Noteholder may designate to the Borrower in writing.

The Borrower may not prepay the within obligation in whole or in part.

This Note shall, at the option of the holder hereof, become immediately due and payable, without notice or demand, upon the happening of any one of the following events:

1. Failure to pay any amount as set forth herein when due;

2. Default in the performance of any other obligation of Borrower to the Noteholder;

3. The making by Borrower of a general assignment for the benefit of creditors; or

4. The filing of any petition or the commencement of any proceeding by or against the Borrower or any endorser or guarantor for any relief under any bankruptcy or insolvency laws, or any laws relating to the relief of debtors, readjustment of indebtedness, reorganizations, compositions or extensions.

Borrower hereby unconditionally waives diligence, presentment, protest, demand for payment, notice of dishonor, notice of default and any or all notices or demands regarding delivery, acceptance, performance, default, enforcement, or otherwise in connection with this Note. All amounts payable hereunder are payable without relief from valuation and appraisement laws.

In the event holder shall institute any action for the collection of the monies due hereunder, Borrower shall be liable, in addition to amounts due, for all costs and expenses, including attorneys' fees with regard to such collection.

STURGIS IRON & METAL CO., INC.

[SEAL]

BY: Ralph Levin
Ralph Levin

Its President

ATTEST:

BY: Delmer Richmond
Delmer Richmond

Its Secretary

AGREEMENT
NOT TO COMPETE

THIS AGREEMENT made and entered into at South Bend, Indiana effective as of May 3, 1985, in multiple counterparts, each of which shall be deemed an original, by and between STURGIS IRON & METAL CO., INC., a Michigan corporation ("Buyer"), and INDUSTRIAL PLANT SERVICE, INC., an Indiana corporation ("Seller"); and Seller's shareholders, JEFFREY MICHAEL HURWICH, SCOTT DAVID HURWICH, and STACEY R. MACDONALD; and Seller's affiliate, JAMES E. HURWICH (said shareholders and affiliate herein collectively referred to as "Seller's Principals").

WHEREAS, the Buyer and Seller have heretofore executed an Agreement for Purchase and Sale of Assets ("Purchase Agreement") dated May 3, 1985; and

WHEREAS, Buyer has purchased substantially all of the operating assets of Seller; and

WHEREAS, it is a condition to closing the Purchase Agreement that the Seller and Seller's Principals enter into an agreement not to compete; and

NOW, THEREFORE, the parties each in consideration of the promises of the other hereinafter contained do now agree as follows:

For a period commencing on the date first above written in this Agreement Not to Compete ("Agreement") and ending on the date five (5) years after such date, Seller and Seller's Principals will not, directly or indirectly, engage in the industrial scrap hauling or industrial trash hauling business in competition with Buyer in the State of Michigan in the counties of Berrien, Cass and St. Joseph, or in the State of Indiana north of U.S. Highway 6; PROVIDED THAT, it is not and shall not be a violation of this Agreement if Seller or Seller's Principals engage in the industrial scrap hauling or industrial trash hauling business in competition with Buyer with respect to any one or more of the following customers, or their successors:

Wyatt Farm Center
Wyatt, Indiana

Hutch's Tire & Retreading
South Bend, Indiana

Scheid Tire, Inc.
South Bend, Indiana

R & J Mfg. Corp. Division of Hoosier Tire
Lakeville, Indiana

Kelly's Tire Service, Inc.
Lakeville, Indiana

Wire Craft Electrical Systems
Lakeville and New Carlisle, Indiana

McGill Mfg. Co. Inc.
Valparaiso, Indiana

Northern Indiana Public Service Co.
LaPorte, Indiana

A & K Industries
Lakeville, Indiana

National Can
Wanatah, Indiana

In the event of a breach of this Agreement by Seller or Seller's Principals, Buyer shall be entitled to any remedy available at law or in equity.

Seller and Seller's Principals shall be jointly and severally liable for any and all breaches hereunder.

IN WITNESS WHEREOF, the parties hereto here set their hands effective on the date first referred to above.

BUYER:

STURGIS IRON & METAL CO., INC.

By Ralph Levin
Ralph Levin
Its President

[SEAL]

Attest:

By Delmer Richmond
Delmer Richmond
Its Secretary

SELLER:

INDUSTRIAL PLANT SERVICE, INC.

By _____
James E. Hurwich
Its President

[SEAL]

Attest:

By _____
Morton M. Dobbins
Its Secretary

SELLER'S PRINCIPALS

_____
James E. Hurwich

_____
Jeffrey Michael Hurwich

_____
Scott David Hurwich

_____
Stacey R. MacDonald

EXHIBIT 3

ASSIGNMENT OF REAL ESTATE SALE CONTRACT

This Assignment of Agreement of Real Estate Sale Contract made this 4th day of February, 1997 by and between Sturgis Iron & Metal Co., Inc. ("Assignor") and R 11, L. L. C., a Michigan limited liability company ("Assignee").

WITNESSETH

A Real Estate Purchase Agreement ("Agreement") dated May 23, 1996, by and between Godfrey Conveyor Co, Inc. ("Seller") and Assignor, a true copy of which is attached hereto, providing that the Seller agreed to sell to the Assignor and Assignor agreed to purchase from the Seller all the land lying in the City of Elkhart, Elkhart County, Indiana which is described in a title commitment issued by Elkhart Title Corp., dated October 29, 1996 under commitment number 96E 16411 ("Property"); and

Assignor hereby desires to assign to Assignee all of its rights and obligations as buyer under the provisions of the Agreement and for the Assignee to accept such assignment.

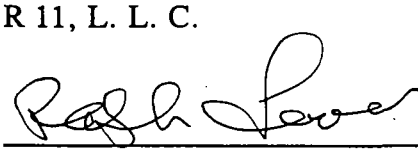
Now, Therefore, the Assignor and Assignee agree as follows:

The Assignor hereby assigns to Assignee and Assignee hereby accepts and assumes from the Assignor, all of Assignor's rights and obligations under the provisions of this Agreement, including, but not limited to all of Assignor's rights, title and interest in to any and all earnest money and deposits paid to Seller, all of Assignor's rights of access to the property and all of Assignor's rights to certain remedies if Seller defaults.

STURGIS IRON & METAL CO., INC.

By: Ralph Levin, President

R 11, L. L. C.



By: Ralph Levin

REAL ESTATE PURCHASE AGREEMENT

THIS AGREEMENT made and entered into this 23 day of May, 1996, by and between GODFREY CONVEYOR CO., INC., hereinafter referred to as "SELLER" and STURGIS IRON & METAL CO., INC., hereinafter referred to as "BUYER".

WITNESSETH

WHEREAS, SELLER holds the title to the real estate hereinafter described; and

WHEREAS, SELLER wishes to sell said real estate to BUYER and BUYER wishes to purchase from SELLER said real estate in cash; and

WHEREAS, SELLER and BUYER hereto wish to reduce their Agreement to writing;

NOW, THEREFORE, in consideration of the premises and the mutual covenants of SELLER and BUYER herein contained, it is mutually agreed as follows:

1. SELLER hereby agrees to sell to BUYER, and BUYER hereby agrees to purchase from SELLER the following described real estate located in Elkhart County, Indiana, commonly known as 1703 S. 13th Street, Elkhart, Indiana: to wit:

See attached Exhibit "A"

For Thirty Thousand and 00/100 ($30,000.00) dollars contingent upon BUYERS obtaining mortgage loan financing on terms satisfactory to BUYER no later than thirty (30) days from the date of this Agreement unless waived by BUYER. Should the BUYER be unable to obtain said financing, or chooses not to waive this condition, all sums paid to SELLER in the form of down payment or earnest money shall be returned to BUYER forthwith, and the obligations of SELLER and BUYER hereunder shall cease and be of no further legal force or effect.

SELLER acknowledges the receipt of One Thousand and 00/100 ($1,000.00) dollars heretofore paid as the initial payment on said purchase price. At closing, BUYER shall pay, or cause to be paid to SELLER, the balance of said purchase price upon delivery by SELLER of warranty deed conveying fee title to said real estate to BUYER.

2. This Agreement is also contingent upon BUYER'S receipt of an environmental audit, and if necessary, a phase II audit, satisfactory to BUYER and BUYER'S counsel. The audit is to be performed by an engineering firm satisfactory to BUYER and BUYER'S financial institution if in fact BUYER finances this purchase. BUYER shall pay the cost of the environmental testing. The BUYER shall have forty-five (45) days from the date of this Agreement to complete the environmental testing. In the event that BUYER is not satisfied with the condition of the property and so notifies the SELLER in writing, the agreement shall terminate and neither party shall have any further liability or responsibility thereunder and, in such event, SELLER shall forthwith return to BUYER its deposit.

3. SELLER shall pay the taxes on said real estate for the year 1995 and prior years. The taxes on said real estate for the year 1996, shall be prorated between SELLER and BUYER to the date of closing. SELLER shall also pay, on or before the date of closing, any and all assessment assessed against the real estate which are not assessed thereon prior to the date of closing.

4. SELLER agrees to affirmatively assist BUYER to rezone the real estate if it is not currency zoned to permit BUYER to store equipment and be used for BUYER'S employees for parking. BUYER shall promptly initiate appropriate action with local governmental officials if the property is not currently zoned for BUYER'S intended uses. If the property cannot be rezoned by the closing date, the Agreement shall terminate and neither party shall have any further liability or responsibility thereunder and in such event, SELLER shall forthwith return to BUYER its deposit.

5. At closing, SELLER agrees to execute and deliver to BUYER a good and sufficient warranty deed conveying said real estate in the same condition it now is, ordinary wear and tear excepted, in fee simple, free and clear of all liens and encumbrances. Within a reasonable time following the execution of this Agreement, which shall be no later than twenty-one (21) days, SELLER, at its expense, shall provide BUYER with a title insurance policy insuring over all objections to or defects in title and on standard form ALTA owner's policy.

6. The risk of loss or damage to said real estate or to the improvements on said real estate by any fire or other cause or occurrences is assumed by SELLER until delivery of said warranty deed by SELLER to BUYER at closing. Within a reasonable time following the execution of this agreement and the performance of an environmental site assessment, which shall be no later than twenty-one (21) days, SELLER, at its expense, shall provide BUYER with a title insurance policy insuring over all objection to or defects in title and on a standard

form ALTA owner's policy.

7. SELLER agrees to deliver possession of said premises to BUYER at the date of closing, which shall be on or before July 15, 1996, or as soon thereafter as the same can be reasonably accomplished, contingent upon the BUYER being satisfied that all conditions have been met unless waived by BUYER. The closing shall take place in Elkhart, Indiana or as the parties shall otherwise agree.

8. This Agreement is contingent upon the BUYER being able to determine to its satisfaction that:

(a) the real estate is not contaminated with Hazardous Substances;

(b) the real estate is not subject to any federal, state or local "superfund" lien, proceedings, claim, liability or action, or the threat or likelihood thereof, for the clean up, removal or remediation of any such Hazardous Substances from the real estate;

(c) there is no asbestos on the real estate; and

(d) there is no underground storage tank(s) on the real estate.

The terms "Hazardous Substance", "release" and "removal" as used herein shall have the same meaning and definition as set forth in 42 USC Section 9601, provided, however, that the term "Hazardous Substance" as used herein shall include "Hazardous Waste" as defined in 42 USC Section 6903 and "petroleum" as defined in 42 USC Section 6991. The term "superfund" as used herein means the Comprehensive Environmental Response, Compensation and Liability Act, as amended, 42 USC Section 9601 et. seq., as amended and any similar state statute or local ordinance applicable to said real estate, and all rules and regulations promulgated, administered and enforced by any government agency or authority pursuant thereto. The term "underground storage tank" is used and shall have the same meaning as set forth in USC Section 991.

9. This Agreement shall be governed by and construed in accordance with the laws of the State of Indiana.

10. The parties agree to close this transaction as soon as possible, and no later than July 15, 1996 unless closing is extended by a written agreement between SELLER and BUYER.

11. SELLER is not making any warranties or representations to BUYER pertaining to the quality or condition of the real estate.

12. SELLER and BUYER agree that the provisions of this Agreement shall be

binding upon, applied to and inured to the benefit of SELLER and BUYER and their respective successors and assigns.

IN WITNESS WHEREOF, SELLER and BUYER have signed, sealed and delivered this Agreement on the day and year first above written.

GODFREY CONVEYOR CO., INC.

By: PRESIDENT

"Seller"

STURGIS IRON & METAL CO., INC.

By:

"Buyer"

MAIL DEED TO: MAIL TAX BILLS TO: John R. Dresser
112 S. Monroe St.
Sturgis, MI 49091

97 002756

HOLD FOR ELKHART TITLE CORP.

CORPORATE WARRANTY DEED

97 011036

This Deed being re-recorded to show correct Grantees name

AUDITOR'S RECORD
FEB 5 2 10 PM '97
Transfer No. FEB 5 2:10 PM '97
ELKHART COUNTY RECORDER
Taxing Unit SUSAN M GUIPE
FILED FOR RECORD
Date

THIS INDENTURE WITNESSETH, that, **GODFREY CONVEYOR CO., INC.**, *the Grantor, a corporation organized and existing under the laws of the State of Indiana* CONVEYS AND WARRANTS TO R 11, L. L. C., a Michigan limited liability company, the Grantee, *for and in consideration of one dollar ($1.00), and other valuable consideration, the receipt of which is hereby acknowledged, the following described real estate in Elkhart County, Indiana:*

MAY 8 11 23 AM '97
MAY 8 11:23 AM '97
ELKHART COUNTY RECORD
SUSAN M GUIPE
FILED FOR RECORD

TRACT I

A portion of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East in the City of Elkhart, Elkhart County, State of Indiana, more particularly described as follows:

Commencing at the intersection of the West line of 13th Street and the South property line of the New York Central Railroad as conveyed to its predecessor, The Lake Shore & Michigan Southern Railway Company by Quit-Claim Deed dated February 16, 1909 and recorded in the Office of the Recorder of Elkhart County on May 1, 1909 in Book 117, page 506, said point being Seventy (70) feet directly South from the Southeast corner of the property formerly owned by the Elkhart Frog & Crossing Company; thence North a distance of Seventy (70) feet to the said Southeast corner; thence West along the South line of the property formerly owned by the said Elkhart Frog and Crossing Company and along the North line of the above conveyance, a distance of Six hundred (600) feet, more or less, to a point Twelve (12) feet Southeasterly by radial measurement from the centerline of the most Easterly track of the Grantor; thence Southerly along a curved line concentric with the centerline of said track, a distance of Two hundred seventy-five (275) feet, more or less, to a point in the South line of the property covered by the above conveyance; thence Northeasterly along said property line, a distance of Seven hundred fifteen (715) feet, more or less, to the point of beginning.

TRACT II

A part of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

Commencing at the Northeast corner of Fourteenth Street as marked on the recorded Plat of Elliston's Addition; thence North Eighty (80) feet; thence West Thirty-three (33) feet; thence South Eighty (80) feet; thence East Thirty-three (33) feet to the place of beginning.

ALSO: A part of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, situated in the City of Elkhart, State of Indiana, bounded and described as follows:

Commencing at the intersection of the West line of Fourteenth Street and the North line of Wolf Avenue, as the said are platted in the City of Elkhart, Indiana; thence South along the West line of Fourteenth Street, Four and thirty-nine hundredths (4.39) feet to an iron stake; thence North Eighty-nine (89) degrees Forty-four (44) minutes West, Ninety-six and seventy-eight hundredths (96.78) feet to an iron stake; thence North Zero (0) degrees Sixteen (16) minutes East, Forth-five and seventy-three hundredths (45.73) feet to an iron stake on the North line of the former Sideway property for the beginning point of this description; thence South Zero (0) degrees Sixteen (16) minutes West, Forty-five and seventy-three hundredths (45.73) feet to an iron stake; thence South Eighty-nine (89) degrees Forty-four (44) minutes East, Ninety-six and seventy-eight hundredths (96.78) feet to an iron stake on the West line of Fourteenth Street; thence North along the West line of Fourteenth Street, Four and thirty-nine hundredths (4.39) feet to the North line of Wolf Avenue; thence South Eighty-nine (89) degrees Fifty-nine (59) minutes East, Seventeen (17) feet to an iron stake; thence North Sixty-two and forty-five hundredths (62.45) feet to an iron stake; thence North Eighty-nine (89) degrees Fifty-nine (59) minutes West, Thirty-three (33) feet; thence North Two and five hundredths (2.05) feet; thence South Seventy-four (74) degrees Twenty-seven (27) minutes West along the North line of the former Sideway Property to the place of beginning.

SUBJECT to an easement for ingress and egress, more particularly described as follows:
All that certain lot, piece or parcels of land situate in the City of Elkhart, County of Elkhart, State of Indiana, bounded and described as follows:

SUBJECT TO FINAL ACCEPTANCE FOR TRANSFER
19 97
AUDITOR
TRANSFER FEE
PARCEL NO.
DISCLOSURE FEE PAID
25-06-07-429-001, 002, 004, 005
NONCONFORMING $ 3.00
May 8 - (3) 19 97
AUDITOR
TRANSFER FEE
PARCEL NO.

Commencing at the Northwest corner of Concord Avenue and Fourteenth Street, said point being Fifty (50) feet Westwardly from the Southwest corner of Lot No. 118 Elliston First Addition, City of Elkhart, State of Indiana; thence North along the West line of said Fourteenth Street, One thousand one hundred forty-seven and sixteen hundredths (1147.16) feet for the beginning point of this description; thence South along the West line of said Fourteenth Street, Six (6) feet; thence North Eighty-nine (89) degrees Forty-four (44) minutes West, Ninety-six and seventy-eight hundredths (96.78) feet; thence North Zero (0) degrees Ten (10)minutes East, Six (6) feet; thence South Eighty-nine (89) degrees Forty-four (44) minutes East, Ninety-six and seventy-eight hundredths (96.78) feet to the place of beginning, the Grantor reserves the right of ingress and egress for itself and its successor and successors in title for persons on foot or vehicles to have free access to the real estate adjacent to the said last described tract of real estate and the same shall at all times be free from obstruction and open for free passage. And the Grantor conveys to the Grantee, his successor, successors and assigns the right of ingress and egress for persons on foot and vehicles to a strip of land Six (6) feet in width by parallel lines adjacent to an immediately adjoining the South boundary line of the last above described tract of real estates.

97-007756

SUBJECT to Public Highways.

TRACT III

A part of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

97 011036

Commencing at a point which is Seventeen hundred fifty-five (1755) feet North and Four hundred thirty-five (435) feet West of the Southeast corner of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, which point is the Northeast corner of a certain parcel of land now owned by the New York Central Railroad Company; thence West Five hundred eighty-four and five tenths (584.5) feet; thence a Northeastwardly direction at an angle of Forty-seven (47) degrees measured from East to Northeast from said South line, a distance of One hundred Forty-four (144) feet to a point; thence Northeastwardly in a straight line Two hundred (200) feet, more or less, to a point on the South line of the right-of-way of Lake Shore and Michigan Southern Railway (now New York Central Railroad Company) which point is Four hundred eighty-five (485) feet distant Northeastwardly from a point which is Seven hundred forty-nine and five tenths (749.5) feet Westwardly from the beginning point of this description, measured along the first above described line produced Westwardly; thence Northeastwardly along the South line of said right of way to a point, which is Four hundred thirty-five (435) feet due North of the place of beginning; thence South Four hundred thirty-five (435) feet to the place of beginning.

SUBJECT to all highways, easements and restrictions of record.

The undersigned persons executing this deed on behalf of Grantor represent and certify that they are duly elected officers of Grantor and have been fully empowered, by proper resolution of the Board of Directors of Grantor, to execute and delivery this deed; that Grantor has full corporate capacity to convey the real estate described herein; and that all necessary corporate action for making of such conveyance has been taken and done, and that no Indiana Gross Income Tax is due or payable at this time in respect to the transfer made by this Deed.

Executed this 23 day of December, 1996.

ATTEST:

By Van W. Kessler
Signature
Van W. Kessler
Printed Name and Office

GODFREY CONVEYOR CO., INC.
(Name of Corporation)

By Robert J. Deputy
Robert J. Deputy
President

ATTEST:

By Lawrence P. Deputy
Signature
Lawrence P. Deputy, Vice-President
Printed Name and Office

GODFREY CONVEYOR CO., INC.
(Name of Corporation)

By William J. Deputy
William J. Deputy
Secretary

County of Elkhart)
) SS:
State of Indiana)

97 011036
97 002756

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared Robert J. Deputy and William J. Deputy, the President and Secretary respectively of GODFREY CONVEYOR CO., INC., who acknowledged the execution of the foregoing Deed for and on behalf of said Grantor on the date of its execution set forth above.

Jan Dickens Sargent, Notary Public
Signature

Jan Dickens Sargent
Printed Name

[SEAL]

A Resident of Elkhart County, Indiana

My Commission Expires 11/17/99

Jan Dickens Sargent
Notary Public, State of Indiana
Elkhart County
My Commission Expires 11/17/99

This instrument was prepared by Richard W. Paulen, Barnes & Thornburg, NBD Bank Building, 121 West Franklin Street, Suite 200, Elkhart, Indiana 46516

RWP 49926

DISCLOSURE FEE NOT REQUIRED
DULY ENTERED FOR TAXATION
SUBJECT TO FINAL ACCEPTANCE FOR TRANSFER
7-1 2005
David L. Hess AUDITOR
003252
TRANSFER FEE 3.00 pd
PARCEL NO.

2005 20391
ELKHART CNTY RECORDER
CHRISTOPHER J ANDERSON
FILED FOR RECORD
AS PRESENTED

2005 JUL -1 A 11:43

RETURN TO: **HOLD FOR MERIDIAN TITLE CORP.**

Property Address:
1703 Thirteenth 1727 Fourteenth
Elkhart, IN 46516

Tax ID No. 20-06-07-429-001-000-012
20-06-07-429-002-000-012
20-06-07-429-004-000-012
20-06-07-429-005-000-012

Mail Tax Statements To:
P.O. Box 579
70675 S. CENTERVILLE RD
Sturgis, MI 49091

QUIT CLAIM DEED

THIS INDENTURE WITNESSETH

R 11, L.L.C., a Michigan limited liability company

RELEASE AND QUIT CLAIM

To Sturgis Iron and Metal Co., Inc., a Michigan Corporation for Ten Dollars and other valuable consideration the receipt whereof is hereby acknowledged, the following described REAL ESTATE in Elkhart, in the State of Indiana, to wit:

SEE ATTACHED LEGAL DESCRIPTION

Subject to taxes for the year 2005, due and payable in 2006, and taxes for all subsequent years.

Subject to covenants, restrictions and easements of record.

The undersigned persons executing this deed on behalf of Grantor represent and certify that they are a current member/manager of said Limited Liability Company and have been fully empowered by a proper meeting and vote of Grantor's members to execute and deliver this deed.

IN WITNESS WHEREOF, The Grantor has executed this deed this 28TH day of June, 2005.

R 11, L.L.C., a Michigan limited liability company

By: Ralph Levin
Ralph Levin, Member

State of Indiana, County of Elkhart ss:

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared the within named Ralph Levin who acknowledged the execution of the foregoing Deed and who, having been duly sworn, stated that the representations therein contained are true.

WITNESS, my hand and Seal this 28TH day of June, 2005.

My Commission Expires: _____

Signature of Notary Public

Printed Name of Notary Public

Notary Public County and State of Residence

NOTARY PUBLIC SEAL INDIANA

JAMES HUGHEY
RES. OF ELKHART CO.
MY COMM. EXP. 6-13-08

This instrument was prepared by: Debra A. Guy, Attorney-at-Law #24473-71.
202 S. Michigan St., Ste. 1000, South Bend, IN 46601
C1223E05 jdh

LEGAL DESCRIPTION

TRACT I

A portion of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East in the City of Elkhart, Elkhart County, State of Indiana, more particularly described as follows:

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TRACT II

art of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

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ALSO: A part of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, situated in the City of Elkhart, State of Indiana, bounded and described as follows:

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TRACT III

A part of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

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EXHIBIT 4

PURCHASE AGREEMENT

1. **PARTIES:** Patrick Industries, Inc., an Indiana corporation ("Seller") agrees to sell and convey to Sturgis Iron and Metal Co., Inc. ("Purchaser") and Purchaser agrees to buy from Seller, the following Property for the consideration and upon and subject to the terms, provisions, and conditions hereinafter set forth.

2. **PROPERTY:** The Property is a tract of land situated in the City of Elkhart, Elkhart County, Indiana, together with all buildings and permanent improvements and fixtures attached thereto such as HVAC system, carpeting and similar types of fixtures (but excluding the generator); and all privileges and appurtenances pertaining thereto including any right, title and interest of Seller in and to adjacent streets, alleys, or rights-of-way; all of the above hereinafter collectively called "Property," and whose legal description is contained on Exhibit "A" attached hereto and incorporated herein. All of the right, title and interest of Seller in and to all contracts, agreements relating to the upkeep, repair, maintenance or operation of the Property which are in effect and are assignable, which Purchaser assumes and agrees to perform all of Seller's obligations after the closing. If Seller decides to sell the generator located on the Property, at or prior to Seller vacating, Seller will offer the generator to Purchaser at fair market value. If the parties cannot agree on the fair market value, they shall select an appraiser with no connections to either party to determine the fair market value. The parties shall each pay one-half of the appraiser's fee.

3. **PRICE:** The total purchase price shall be One Million One Hundred Thousand Dollars ($1,100,000) ("Purchase Price"), payable in accordance with the terms and conditions stated in this agreement.

4. **CLOSING:** The closing of the sale (the "Closing Date") shall take place at a mutually agreed place in Elkhart, Indiana within thirty (30) days from the date hereof, unless extended in a writing signed by both parties hereto, with the costs thereof shared equally.

5. **POSSESSION:** The Seller shall retain possession of the Property office portion of 1819 S. 14th Street, the house at 1313 Wolf Avenue and the office at

1800 S. 14th Street in Elkhart, Indiana, rent free, for a period of up to two (2) years. Seller shall pay real estate taxes, insurance (naming Buyer as a co-insured) and maintenance on said office portion of 1819 S. 14th Street, 1800 S. 14th Street and 1313 Wolf Avenue for the period of its occupancy, including without implied limitation, lawn maintenance and snow removal for the premises. Taxes for the office portion of 1819 S. 14th Street shall be prorated based upon the square footage. The balance of the Property shall be delivered to Purchaser at closing in its present condition, ordinary wear and tear excepted. Seller agrees to maintain the Property in good condition until possession is delivered to Purchaser. Seller shall retain and remove the generator on the Property when Seller moves out of the Property. At the end of the two (2) year rental, Seller shall have an option to rent all or any portion of the three (3) above-described addresses for an additional twelve (12) months at a fair market rent. If the parties cannot agree on a fair market rent, they shall jointly appoint a real estate appraiser to determine the fair market rent. The decision of the appraiser shall be final.

6. **REAL ESTATE TAXES:** All real estate taxes due for the current and any prior calendar year and remaining unpaid, shall be paid by Seller. All accruing real estate taxes shall be prorated to the date of closing except as provided in Section 5. If the current tax rate has not been established, the prior year rate will be used to compute the proration.

7. **DISCLOSURE OF LIENS AND CLAIMS:** Purchaser acknowledges purchasing the Property and accepting it in its "AS IS – WHERE IS" condition based upon inspection as to the Property, without representation or warranty on the part of the Seller except as specifically set forth in this section 7. Seller's representations, warranties and covenants shall survive the consummation of the purchase by Buyer for a period of twelve months after the closing.

a. Except as shown on the title commitment, Seller is the fee title owner of the Property subject to no liens, encumbrances, pledges, or mortgages;

b. Except as shown on the title commitment, to the knowledge of Seller, there are no unrecorded or undisclosed legal or equitable interests in the Property owned by any other party other than Seller;

c. To the knowledge of Seller, there is no special assessment by any governmental authority, presently outstanding, for improvements or otherwise which has or may become a lien against the Property. Further, Seller knows of no proposed assessments for any public improvements against the Property;

d. Seller has received no notice of, and has no knowledge of, any existing condemnation, eminent domain proceedings or any action of a similar kind or other modification of the zoning classification at the Property.

e. To the knowledge of Seller, there are no existing violations of any zoning ordinance, building rule or regulation affecting the Property in any material respect;

f. Seller has no knowledge of any material defect, whether latent or patent with respect to the Property;

g. Seller is not currently a party to any proceeding under any applicable bankruptcy, reorganization, insolvency or similar laws; and

h. Seller is a duly organized and validly existing Indiana corporation.

8. **TITLE APPROVAL:** Seller, at its expense, shall deliver to Purchaser within fifteen (15) days after acceptance of this purchase agreement, a Commitment for Title Insurance from Century Title Co. with the standard exceptions deleted at Purchaser's expense, if any, in the amount of the Purchase Price to insure in Purchaser a marketable title in fee simple absolute to the Property, and subject to the easements and restrictions of record, current zoning laws, and real estate taxes on the Closing Date (the "Commitment") and, at Purchaser's request, legible copies of all recorded instruments affecting the Property recited as exceptions in the Commitment. If Purchaser has an objection to items disclosed in such Commitment, Purchaser shall promptly make written objection to Seller after receipt of each such

instrument. If Purchaser makes such objections or if the objections are disclosed in the Commitment, Seller shall have thirty (30) days from the date such objections are disclosed to cure the same, and the Closing Date shall be extended if necessary. Seller agrees to utilize its best efforts and reasonable diligence to cure such objection, if any. If the objections are not satisfied within such time period, Purchaser may (a) terminate this Contract, or (b) waive the unsatisfied objections and close the transaction.

9. **PURCHASER'S CONDITIONS TO CLOSING.**

Purchaser's obligations under this agreement are expressly conditioned upon the occurrence of the following events:

(1) The Title Company shall be ready, willing and able to issue the Title Policy in the form required on the Closing Date.

(2) Seller shall be ready, willing and able to deliver to Purchaser on the Closing Date the fully executed Warranty Deed, in form acceptable to Purchaser and its counsel, as required hereunder.

(3) The Purchaser shall have received an affidavit of the Seller, sworn to under penalty of perjury, setting forth the Seller's name, address and Federal tax identification number and stating that such Seller is not a "foreign person" within the meaning of Section 1445 of the Internal Revenue Code of 1986 (the "Code"), or, alternatively, if applicable, a statement issued by the Seller and otherwise in the form required by the Code certifying that the Seller was not a "United States real property holding company" within the meaning of the Code at any time during the five years preceding the Closing Date. If, on or before

the Closing Date, the Purchaser shall not have received each such affidavit or such statement, the Purchaser may withhold from the Purchase Price payable pursuant hereto at Closing to Seller such sums as are required to be withheld therefrom under Section 1445 of the Code.

(4) Seller's delivery of the Indiana Responsible Property Transfer Act disclosure, if applicable.

(5) Purchaser and/or the Title Company shall have received such other documents as, in the opinion of Purchaser's counsel, and the title insurer, are necessary to complete the transactions contemplated by this Agreement, including without limitation a fully executed Indiana Disclosure of Sales form.

10. **SELLER'S CONDITIONS TO CLOSING:**

Seller's obligations under this agreement are expressly conditioned upon the occurrence of the following events:

Purchaser shall have delivered to the Closing Agent the Purchase Price on the Closing Date.

11. **SALES EXPENSES:** Seller and Purchaser agree that all sales expenses are to be paid in cash prior to or at the closing.

a. Seller's Expenses. Seller shall be responsible for and pay all costs for the following: 1) releasing existing liens and recording the releases; 2) Owner's Title Policy; 3) one-half (1/2) of any closing fee; 4) preparation of Deed and Vendor's Affidavit; and 5) other expenses stipulated to be paid by Seller under other provisions of this Contract.

b. Purchaser's Expenses. Purchaser agrees to pay all other recording fees; one-half (1/2) of any closing fee; copies of documents pertaining to

restrictions, easements, or conditions affecting the Property; and expenses stipulated to be paid by Purchaser under other provisions of this agreement.

12. **DEFAULT:** If Purchaser breaches this agreement and is in default, (a) Seller may seek specific performance or any other remedy provided by law or equity; or (b) Seller may treat this Agreement as being terminated. If Seller, through no fault of Seller, is unable to convey marketable title as required by this agreement and the defect or defects are not waived by Purchaser, Seller's sole obligation shall be to return promptly any Earnest Money and any sums expended by Purchaser for survey or title evidence; provided, however, Purchaser shall have the right to pay and satisfy any existing liens not otherwise assumed by Purchaser and deduct that amount from the Purchase Price. If Seller refuses to perform as required, Purchaser may pursue all available legal and equitable remedies.

13. **ATTORNEY'S FEES:** Any signatory to this agreement who is the prevailing party in any legal or equitable proceeding against any other signatory brought under or with relation to the agreement or transaction shall be additionally entitled to recover court costs and reasonable attorney's fees from the non-prevailing party.

14. **DUTIES OF PURCHASER AND SELLER AT CLOSING:**

a. At the closing, Seller shall deliver to Purchaser, at Seller's sole cost and expense, the following:

(1) A duly executed and acknowledged Deed conveying good and indefeasible title in fee simple to all of the Property, free and clear of any and all liens, encumbrances, conditions, easements, assessments, reservations and restrictions, except as permitted herein and/or approved by Purchaser in writing and execute a Vendor's Affidavit;

(2) An Owner's Policy of Title Insurance (the "Title Policy") issued by a reputable title insurance company

chosen by the Seller in the full amount of the Purchase Price, dated as of the closing, insuring Purchaser's fee simple title to the Property to be good and indefeasible.

(3) Furnish evidence of its capacity and authority for the closing of this transaction;

(4) Seller agrees to provide Purchaser with a certification establishing that no federal income tax is required to be withheld under the Foreign Investment and Real Property Tax Act, nor any Indiana Gross Income Tax, or to consent to withholding of tax from the proceeds of sale as required;

(5) Execute all other necessary documents to close this transaction.

b. At the closing, Purchaser shall perform the following:

(1) Pay the cash portion of the Sales Price in the form of a certified or cashier's check;

(2) Furnish evidence of its capacity and authority for the closing of this transaction;

(3) Execute all other necessary documents to close this transaction.

15. **CONDEMNATION:** If prior to Closing Date condemnation proceedings are commenced against any portion of the Property, Purchaser may, at its option, terminate this agreement by written notice to Seller within ten (10) days after Purchaser is advised of the commencement of condemnation proceedings, or Purchaser shall have the right to appear and defend in such condemnation proceedings, and any award in condemnation shall, at the Purchaser's election, become the property of Seller and reduce the purchase price by the same amount or shall become the property of Purchaser and the purchase price shall not be reduced.

16. **CASUALTY LOSS:** Risk of loss by damage or destruction to the Property prior to the closing shall be borne by Seller. In the event any such damage or destruction is not fully repaired prior to closing, Purchaser, at its option, may either (a) terminate this Agreement, or (b) elect to close the transaction, in which event Seller's right to all insurance proceeds resulting from such damage or destruction shall be assigned in writing by Seller to Purchaser.

17. **CONTINGENCIES:** This Agreement is contingent upon

a. Purchaser obtaining financing in the amount of Nine Hundred Ninety Thousand Dollars ($990,000) at market rates.

b. Purchaser obtaining at its own expense, a Phase II environmental report for the work described in Exhibit B attached hereto which does not recommend further testing and does not indicate that Purchaser's ownership of the Property will impose liability on Purchaser under any applicable federal or state environmental laws.

18. **MISCELLANEOUS:**

a. Any notice required or permitted to be delivered hereunder, shall be deemed received when personally delivered or sent by United States mail, postage prepaid, certified and return receipt requested, addressed to Seller or Purchaser, as the case may be, at the address set forth below the signature of such party hereto, with a copy to their respective counsel.

b. During the term of this agreement, Seller shall entertain no competing offers nor shall he negotiate with any third person or entity for the sale of this Property.

c. Both Purchaser and Seller agree that there are no brokers involved in this agreement.

d. Purchaser reserves the right to assign its interest in this agreement to persons or entities of his choice without recourse to the Purchaser. In the event of such assignment, Purchaser shall have no personal liability to the Seller

or to any third party on account of this agreement. In the event of assignment, all Purchaser's rights under this agreement will transfer to the Assignee.

e. This agreement shall be construed under and in accordance with the laws of the State of Indiana.

f. This agreement shall be binding upon and inure to the benefit of the parties hereto and their respective legal representatives, successors and assigns.

g. In case of any one or more of the provisions contained in this agreement shall for any reason be held to be invalid, illegal, or unenforceable in any respect, such invalidity, illegality, or unenforceability shall not affect any other provision hereof, and this agreement shall be construed as if such invalid, illegal, or unenforceable provision had never been contained herein.

h. This agreement constitutes the sole and only agreement of the parties hereto and supersedes any prior understandings or written or oral agreements between the parties respecting the transaction and cannot be changed except by their written consent.

i. Time is of the essence of this agreement.

j. Words of any gender used in this agreement shall be held and constructed to include any other gender, and words in the singular number shall be held to include the plural, and vice versa, unless the context requires otherwise.

k. All rights, duties and obligations of the signatories hereto shall survive the passing of title to, or an interest in, the Property.

1. This agreement may be executed simultaneously or in two or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.

"PURCHASER"	"SELLER"
Sturgis Iron and Metal Co., Inc.	Patrick Industries, Inc.
By: Ralph Levin President Mia Levin-Horwitz Secretary	By: [illegible] VP Finance
Date: 7/7, 2004	Date: 7/13/, 2004
P.O. Box 579, Sturgis, Mi. 49091 Purchaser's Address for Notice Purposes	1800 S. 14th St. Elkhart, IN 46516 Seller's Address for Notice Purposes

Exhibit A

TRACT I

All that certain lot, piece or parcels of land situate in the City of Elkhart, County of Elkhart, State of Indiana, bounded and described as follows:

Commencing at the northwest corner of Concord Avenue and Fourteenth Street, said point being fifty (50) feet westwardly from the southwest corner of Lot No. 118 Elliston First Addition, City of Elkhart, State of Indiana; thence north along the west line of said Fourteenth Street, eleven hundred forty-five and fifty-five hundredths (1145.55) feet to the north line of Wolf Avenue; thence south along the west line of said Fourteenth Street four and thirty-nine hundredths (4.39) feet to an iron stake for the beginning point of this description; thence south along the west line of said Fourteenth Street sixty-eight and fifty-nine hundredths (68.59) feet to an iron stake; thence north eighty-nine (89) degrees forty-four (44) minutes west; seventeen and two tenths (17.2) feet to a brick building; thence north eighty-nine (89) degrees forty-four (44) minutes west along the south line of a thirteen (13) inch brick wall seventy-six and four hundredths (76.04) feet; thence south zero (0) degrees sixteen (16) minutes west, six and nine tenths (6.9) feet to a cut in the concrete; thence north eighty-nine (89) degrees forty-four (44) minutes west, one hundred fifty-seven and ninety-four hundredths (157.94) feet to an iron stake which is two (2) feet east of the guage of the east rail of a switch track; thence north six (6) degrees twenty (20) minutes west, seventy-five and fifty-six hundredths (75.56) feet to an iron stake, which is two (2) feet east of the guage of the east rail of said switch track, said iron stake being on the north line of the former Sidway property; thence north seventy-four (74) degrees twenty-seven (27) minutes east along the north line of said former Sidway property, one hundred sixty-nine and three tenths (169.3) feet to an iron stake; thence South zero (0) degrees sixteen minutes (16) west, forty-five and seventy-three hundredths (45.73) feet to an iron stake; thence south eighty-nine (89) degrees forty-four (44) minutes east, ninety-six and seventy-eight hundredths (96.78) feet to the place of beginning.

TRACT 2

All that certain lot, piece or parcels of land situate in the City of Elkhart, County of Elkhart, State of Indiana, bounded and described as follows:

Commencing at the northwest corner of Concord Avenue and Fourteenth Street, said point being fifty (50) feet westwardly from the southwest corner of Lot No. 118 Elliston First Addition, City of Elkhart, State of Indiana; thence north along the west line of said Fourteenth Street, one thousand seventy-two and fifty-seven hundredths (1072.57) feet to an iron stake for the beginning point of this description; thence north eighty-nine (89) degrees forty-four (44) minutes west, ninety-three

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and twenty-four hundredths (93.24) feet; thence south zero (0) degrees sixteen (16) minutes west, thirteen and eight tenths (13.8) feet; thence south eighty-nine (89) degrees forty-four (44) minutes east, ninety-three and three tenths (93.3) feet to the west line of Fourteenth Street; thence north along the west line of Fourteenth Street, thirteen and eight tenths (13.8) feet to the place of beginning.

TRACT 3

All that certain lot, piece or parcels of land situate in the City of Elkhart, County of Elkhart, State of Indiana, bounded and described as follows:

Commencing at the northwest corner of Concord Avenue and Fourteenth Street, said point being fifty (50) feet westwardly from the southwest corner of Lot No. 118 Elliston First Addition, City of Elkhart, State of Indiana; thence north along the west line of said Fourteenth Street eleven hundred forty-five and fifty-five hundredths (1145.55) feet to the north line of Wolf Avenue; thence south along the west line of said Fourteenth Street four and thirty-nine hundredths (4.39) feet to an iron stake; thence south along the west line of said Fourteenth Street sixty-eight and fifty-nine hundredths (68.59) feet to an iron stake, thence north eighty-nine (89) degrees forty-four (44) minutes west seventeen and two tenths (17.2) feet to a brick building, thence north eighty-nine (89) degrees forty-four (44) minutes west along the south line of a thirteen (13) inch brick wall, seventy-five and four hundredths (75.04) feet for the beginning point of this description; thence south zero (0) degrees, sixteen (16) minutes west, thirteen and eight tenths (13.8) feet; thence north eighty-nine (89) degrees forty-four (44) minutes west, one hundred and fourteen hundredths (100.14) feet; thence north zero (0) degrees sixteen (16) minutes east, five and eight tenths (5.8) feet; thence north eighty-nine (89) degrees eighteen (18) minutes west, forty-seven (47) feet; thence north seven and sixty-five hundredths (7.65) feet; thence eastwardly to the place of beginning.

TRACT 4

All that certain lot, piece or parcels of land situate in the City of Elkhart, County of Elkhart, State of Indiana, bounded and described as follows:

Commencing at the northwest corner of Concord Avenue and Fourteenth Street, said point being fifty (50) feet westwardly from the southwest corner of Lot No. 118 Elliston First Addition, City of Elkhart, State of Indiana; thence north along the west line of said Fourteenth Street one thousand one hundred forty-seven and sixteen hundredths (1147.16) feet for the beginning point of this description; thence south along the west line of said Fourteenth Street twelve (12) feet; thence north eighty-nine (89) degrees Forty-four (44) minutes west, ninety-six and seventy-eight hundredths (96.78) feet; thence north zero (0) degrees ten (10) minutes east, twelve (12) feet, thence south eighty-nine (89) degrees forty-four (44) minutes east, ninety-six and seventy-eight hundredths (96.78) feet to the Place of beginning.

TRACT 5

All that certain lot, piece or parcels of land situate in the City of Elkhart, County of Elkhart, State of Indiana, bounded and described as follows:

Commencing at the northwest corner of Concord Avenue and Fourteenth Street, said point being fifty (50) feet westwardly from the southwest corner of Lot No. 118 Elliston First Addition, City of Elkhart, State of Indiana; thence north along the west line of said Fourteenth Street eleven hundred forty-five and fifty-five hundredths (1145.55) feet to the north line of Wolf Avenue; thence south along the west line of said Fourteenth Street four and thirty-nine hundredths (4.39) feet to an iron stake; thence south along the west line of said Fourteenth Street sixty-eight and fifty-nine hundredths (68.59) feet to an iron stake; thence north eighty-nine (89) degrees forty-four (44) minutes west seventeen and two tenths (17.2) feet to a brick building for the beginning point of this description; thence north eighty-nine (89) degrees forty-four (44) minutes west along the south line of a thirteen (13) inch brick wall seventy-six and four hundredths (76.04) feet; thence north zero (0) degrees sixteen (16) minutes east, thirteen (13) inches to the north side of said wall; thence south eighty-nine (89) degrees forty-four (44) minutes east along the north line of said wall seventy-six and four hundredths (76.04) feet; thence south zero (0) degrees sixteen (16) minutes west, thirteen (13) inches to the place of beginning.

Subject to all easements and restrictions, more fully set out in Deed Record 173, Page 470, and recorded in the Office of the Recorder of Elkhart County, Indiana.

The West eighty (80) feet of the East one hundred eighty-nine (189) feet by parallel lines of that part of Lot Number Three Hundred Fifty-five (355) as the said Lot is known and designated on the recorded Plat of ELLISTON ADDITION, which is south of Wolf Avenue as said street is now used in the City of Elkhart; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

SUBJECT TO taxes, easements, assessments, restrictions, covenants and encumbrances, if any, of record.

Lot Number Three Hundred Forty-nine (349), as the said Lot is known and designated on the Recorded Plat of ELLISTONS ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

Lot Number Three Hundred Fifty-one (351), as the said Lot is known and designated on the recorded Plat of ELLISTON ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO:

Lot Number Three Hundred Fifty (350), as the said Lot is known and designated on the recorded Plat of ELLISTON ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

Lot Number Three Hundred Fifty-two (352), as the said Lot is known and designated on the recorded Plat of ELLISTON ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

Lots Numbered Three Hundred Twenty-seven (327) and Three Hundred Twenty-eight (328), as the said Lots are known and designated on the recorded Plat of ELLISTON ADDITION, to the City of Elkhart; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO, Lots Numbered Three Hundred Fifty-three (353) and Three Hundred Fifty-four (354), as the said Lots are known and designated on the recorded Plat of ELLISTON ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana. Also, the South half (S 1/2) of the vacated alley lying North of and adjacent to said Lots.

ALSO, all that part of Lot Number Three Hundred Fifty-five (355), as the said Lot is known and designated on the recorded Plat of ELLISTON ADDITION to the City of Elkhart, lying South of Wolf Avenue, as the said street is now used in the City of Elkhart, Indiana, EXCEPTING therefrom the East One Hundred Eighty-nine (189) feet. ALSO, EXCEPTING that part of said Lot deeded to the City of Elkhart for alley purposes, and more particularly described in Deed Record 277, page 634. Said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana. ALSO CONVEYING the North half (N 1/2) of the vacated alley lying north of Lots Three Hundred Fifty-three (353) and Three Hundred Fifty-four (354) in said Addition and south of Lot Three Hundred Fifty-five (355) in said addition.

Lot Number Three Hundred Twenty-nine (329) as the same is known and designated on the recorded Plat of ELLISTON'S FIRST ADDITION to the City of Elkhart, Indiana; as recorded in Deed Record 111, page 188 of the records in the Office of the Recorder of Elkhart County, Indiana.

.00CK

Subject to easements & restrictions of record.

2004-31095

ELKHART CNTY RECORDER
CHRISTOPHER J ANDERSON
FILED FOR RECORD

2004 SEP 14 A 11:47

Century Title Services

MAIL DEED TO:
Sturgis Iron & Metal Co., Inc.
c/o Dresser, Dresser, Haas & Cagnard
112 S. MONROE St
Sturgis, Mi 49091

MAIL TAX BILLS TO:
Sturgis Iron & Metal Co., Inc.
P.O. BOX 579, Sturgis, Mi 49091

WARRANTY DEED

Patrick Industries, Inc., for itself and as successor to Industrial Lamp Corporation and ILC Products Company, Inc., *the Grantor*
Conveys and Warrants to Sturgis Iron & Metal, Inc., *the Grantee*

for and in consideration of One Dollar ($1) and other good and valuable consideration, the receipt of which is hereby acknowledged, Real Estate in Elkhart County, in the State of Indiana, described as follows:

See Exhibit A attached hereto and incorporated herein.

Subject to 2003 real estate taxes due in 2004, 2004 real estate taxes due in 2005, public rights of way, and easements and restrictions of record.

The undersigned persons executing this deed on behalf of the Grantor certify that: they are duly elected officers of Grantor and have been fully empowered, by proper resolution of the Board of Directors of Grantor, to execute and deliver this [illegible]d; that Grantor has full corporate capacity to convey the real estate described herein; and that all necessary corporate action [illegible] the making of such conveyance has been taken and done.

Signed and dated on September 7, 2004.

State of Indiana, Elkhart County, ss
Before me, the undersigned, a Notary Public in and for said County and State, personally appeared Patrick Industries, Inc. by its Secretary, Andy L. Nemeth, and being duly authorized, acknowledged the execution of the foregoing deed on behalf of said corporation on September 7, 2004.

Edward W Hardig Jr.
Notary Public Signature

Typed or Printed Name
Residing in Elkhart County
My Commission Expires: _____

Patrick Industries, Inc.

By: [signature]
Signature

Typed or printed name: Andy L. Nemeth, Secretary

NOTARY PUBLIC SEAL STATE OF INDIANA
EDWARD W. HARDIG, Jr, Notary Public
A Resident of St. Joseph County, IN
My Commission Expires: 09-24-2008

Prepared by the law firm of Warrick & Boyn, LLP, 121 W. Franklin Street, Suite 400, Elkhart, Indiana 46516, by James V. Woodsmall.

msw\reale\pisim-wtydeed\jvw\mj

DISCLOSURE FEE PAID
$10.00
DULY ENTERED FOR TAXATION
SUBJECT TO FINAL ACCEPTANCE FOR TRANSFER
9-14 2004
David L. Hess AUDITOR
005413
TRANSFER FEE 3.00pd
PARCEL NO. 2006-07-429-003/431-013.000-012
20-06-07-478-009/017.000-012
20-06-07-476-002.000-012
20-06-07-479-001 thru -004.000-012

2004-31095

EXHIBIT A - LEGAL DESCRIPTION

TRACT I:

A portion of the East One-Half of the Southeast Quarter of Section 7, Township 37 North, Range 5 East, Concord Township, Elkhart County, Indiana, more particularly described as follows:

COMMENCING at the Northwest corner of Concord Avenue, and Fourteenth Street, said point being 50 feet Westwardly from the Southwest corner of Lot Number 118, Elliston Addition to the City of Elkhart, and marked by a 3/4" iron pipe; thence North along the West line of said Fourteenth Street, a distance of 516.12 feet to a 1/2" iron pipe and the point of beginning; thence North 88°09'27" West, a distance of 358.47 feet to a 1" iron pipe; thence North 00°01'25" East, a distance of 312.90 feet to a 3/4" rebar w/cap; thence North 01°40'35" West, a distance of 79.35 feet to a 3/4" rebar w/cap; thence North 05°40'35" West, a distance of 135.45 feet to a 3/4" rebar w/cap; thence North 03°55'25" East, a distance of 58.43 feet to a 3/4" rebar w/cap; thence North 75°02'21" East, a distance of 114.03 feet to a 3/4" rebar w/cap; thence North 75°35'14" East, a distance of 169.23 feet to a 3/4" rebar w/cap; thence South 00°16'00" West, a distance of 45.73 feet to a 3/4" rebar w/cap; thence South 89°44'00" East, a distance of 96.78 feet to a 1" iron pipe, said point being on the West line of said Fourteenth Street; thence South 00°02'51" West, along said West line, a distance of 625.27 feet to the point of beginning.

TRACT II:

Lots Numbered 353 and 354 as the said Lots are known and designated on the recorded Plat of Elliston Addition to the City of Elkhart; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO, the South Half of the vacated alley lying North of and adjacent to said Lots.

ALSO, all that part of Lot Number 355, as the said Lot is known and designated on the recorded Plat of Elliston Addition to the City of Elkhart, lying South of Wolf Avenue as the said street is now used in the City of Elkhart, Indiana; EXCEPTING THEREFROM the East 189 feet.

ALSO, EXCEPTING that part of said Lot deeded to the City of Elkhart for alley purposes, and more particularly described in Deed Record 277, page 634. Said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart

EH

EXHIBIT A - CONT'D

County, Indiana.

ALSO conveying the North Half of the vacated alley lying North of Lots 353 and 354 in said Addition and South of Lot 355 in said Addition.

ALSO, COMMENCING on the South line of an East-West alley lying between Lots 347-354, inclusive, and Lot 355 in Elliston's Addition to the City of Elkhart, Indiana, at an iron at the Northeast corner of Lot 349 in Elliston's Addition; thence Westwardly along the South line of said alley, 100 feet to the Northeast corner of Lot 351 in Elliston's Addition; thence Northwardly parallel with the West right-of-way line of Thirteenth Street in said City, 12 feet to a point on the North line of said alley, which is the point of beginning; thence Northwardly parallel with the Easterly right-of-way line of Fourteenth Street in said City, 52 feet, more or less, to the South right-of-way line of Wolf Avenue; thence Eastwardly along the South right-of-way line of Wolf Avenue, 16.5 feet; thence Southwardly parallel with the East right-of-way line of said Fourteenth Street, 35.77 feet, more or less, to a point 16.5 feet North of the North right-of-way line of said alley; thence Southeasterly 23.33 feet to a point on the North line of said alley, 167 feet West of the West right-of-way line of Thirteenth Street; thence Westwardly along the North right-of-way line of said alley, 33 feet, more or less to the place of beginning.

ALSO, the West 80 feet of the East 189 feet by parallel lines of that part of Lot Number 355 as the said Lot is known and designated on the recorded Plat of Elliston Addition, which is South of Wolf Avenue, as said street is now used in the City of Elkhart; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO, Lots Numbered 349, 350, 351 and 352 as the said Lots are known and designated on the recorded Plat of Elliston's Addition, City of Elkhart; said plat being recorded in Plat Book 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO: Lot Number 300, as the said Lot is known and designated on the recorded Plat of Elliston Addition to the City of Elkhart, Indiana; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

EH

EXHIBIT A - CONT'D

ALSO: Lots Numbered 326, 327 and 299, as said Lots are known and designated on the recorded Plat of Elliston Addition to the City of Elkhart, Indiana.

ALSO: Lot Number 329 as the same is known and designated on the recorded Plat of Elliston's First Addition to the City of Elkhart, Indiana; as recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO: Lot Number 301 as the said Lot is known and designated on the recorded Plat of Elliston's Addition to the City of Elkhart, Indiana; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO: Ellistons Lots 302, 303 and 304 in Elkhart City Concord Township.

ALSO: Lots Numbered 327 and 328 as the said Lots are known and designated on the recorded Plat of Elliston Addition to the City of Elkhart, said Plat being recorded in Plat Book 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

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INDEMNIFICATION AGREEMENT

This Indemnification Agreement is made as of this 24th day of September, 2004 by Patrick Industries, Inc., an Indiana corporation, ("Patrick") in favor of Sturgis Iron & Metal Co., Inc., a Michigan corporation, ("Sturgis").

WITNESSETH:

WHEREAS, Sturgis is purchasing the real estate described in Exhibit A from Patrick;

WHEREAS, Sturgis has obtained a Phase II report on the real estate which is attached hereto as Exhibit B;

WHEREAS, Sturgis and Patrick desire to allocate their environmental liabilities for the matters described in Exhibit B;

NOW, THEREFORE, IN CONSIDERATION of One Dollar ($1.00) and other good and valuable consideration, Patrick agrees as follows:

1. Patrick, its successors and assigns agrees to defend, indemnify and hold harmless Sturgis, its directors, officers, and employees, from and against any all judgments, causes of actions, administrative orders, consent agreements and orders, liabilities, including but not limited to any cleanup costs, remediation costs, response costs which Sturgis may incur in relation to the real estate described in Exhibit A which relates to matters described in Exhibit B and for which Patrick is liable pursuant to applicable federal law including but not limited to the Comprehensive Environmental Response, Compensation and Liability Act, the Resource Conservation and Recovery Act, or the Federal Water Pollution Control Act and the related Indiana statutes. In the event of any claim covered hereunder, Sturgis shall promptly notify Patrick, who shall assume defense of the matter at Patrick's expense. Sturgis agrees to cooperate with Patrick in implementing this agreement and any remediation or feasibility studies.
2. This Agreement shall be governed by and construed in accordance with the laws of the United States and the State of Indiana.
3. No amendment, change or modification of this agreement shall be valid, unless in writing and signed by the party against whom enforcement of the change is sought.
4. All of the terms and provisions contained herein shall inure to the benefit of and shall be binding upon the parties hereto and their respective successors and assigns.

5. No waiver of a breach of any provision of this agreement shall constitute a waiver of any preceding or succeeding breach of the same or any other provision.
6. In case any one or more of the provisions of this agreement shall be invalid, illegal or unenforceable in respect, the validity of this agreement and the remaining provisions thereof shall be in no way affected, prejudiced or disturbed thereby.
7. In the event of any dispute between the parties hereto, the substantially prevailing party in any litigation shall be entitled to recover their attorneys' fees from the other party.
8. This agreement cannot be assigned by either party without the prior written consent of the other party.

Dated: 9-7, 2004.

PATRICK INDUSTRIES, INC.

By: _____
Andy L. Nemeth, Secretary

STURGIS IRON & METAL Co., Inc.

By: _____
Ralph Levin, President

CASE NO. 042001449

EXHIBIT A - LEGAL DESCRIPTION

TRACT I:

A portion of the East One-Half of the Southeast Quarter of Section 7, Township 37 North, Range 5 East, Concord Township, Elkhart County, Indiana, more particularly described as follows:

COMMENCING at the Northwest corner of Concord Avenue, and Fourteenth Street, said point being 50 feet Westwardly from the Southwest corner of Lot Number 118, Elliston Addition to the City of Elkhart, and marked by a 3/4" iron pipe; thence North along the West line of said Fourteenth Street, a distance of 516.12 feet to a 1/2" iron pipe and the point of beginning; thence North 88°09'27" West, a distance of 358.47 feet to a 1" iron pipe; thence North 00°01'25" East, a distance of 312.90 feet to a 3/4" rebar w/cap; thence North 01°40'35" West, a distance of 79.35 feet to a 3/4" rebar w/cap; thence North 05°40'35" West, a distance of 135.45 feet to a 3/4" rebar w/cap; thence North 03°55'25" East, a distance of 58.43 feet to a 3/4" rebar w/cap; thence North 75°02'21" East, a distance of 114.03 feet to a 3/4" rebar w/cap; thence North 75°35'14" East, a distance of 169.23 feet to a 3/4" rebar w/cap; thence South 00°16'00" West, a distance of 45.73 feet to a 3/4" rebar w/cap; thence South 89°44'00" East, a distance of 96.78 feet to a 1" iron pipe, said point being on the West line of said Fourteenth Street; thence South 00°02'51" West, along said West line, a distance of 625.27 feet to the point of beginning.

TRACT II:

Lots Numbered 353 and 354 as the said Lots are known and designated on the recorded Plat of Elliston Addition to the City of Elkhart; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO, the South Half of the vacated alley lying North of and adjacent to said Lots.

ALSO, all that part of Lot Number 355, as the said Lot is known and designated on the recorded Plat of Elliston Addition to the City of Elkhart, lying South of Wolf Avenue as the said street is now used in the City of Elkhart, Indiana; EXCEPTING THEREFROM the East 189 feet.

Continued on next page

EXHIBIT A - CONT'D

ALSO, EXCEPTING that part of said Lot deeded to the City of Elkhart for alley purposes, and more particularly described in Deed Record 277, page 634. Said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO conveying the North Half of the vacated alley lying North of Lots 353 and 354 in said Addition and South of Lot 355 in said Addition.

ALSO, COMMENCING on the South line of an East-West alley lying between Lots 347-354, inclusive, and Lot 355 in Elliston's Addition to the City of Elkhart, Indiana, at an iron at the Northeast corner of Lot 349 in Elliston's Addition; thence Westwardly along the South line of said alley, 100 feet to the Northeast corner of Lot 351 in Elliston's Addition; thence Northwardly parallel with the West right-of-way line of Thirteenth Street in said City, 12 feet to a point on the North line of said alley, which is the point of beginning; thence Northwardly parallel with the Easterly right-of-way line of Fourteenth Street in said City, 52 feet, more or less, to the South right-of-way line of Wolf Avenue; thence Eastwardly along the South right-of-way line of Wolf Avenue, 16.5 feet; thence Southwardly parallel with the East right-of-way line of said Fourteenth Street, 35.77 feet, more or less, to a point 16.5 feet North of the North right-of-way line of said alley; thence Southeasterly 23.33 feet to a point on the North line of said alley, 167 feet West of the West right-of-way line of Thirteenth Street; thence Westwardly along the North right-of-way line of said alley, 33 feet, more or less to the place of beginning.

ALSO, the West 80 feet of the East 189 feet by parallel lines of that part of Lot Number 355 as the said Lot is known and designated on the recorded Plat of Elliston Addition, which is South of Wolf Avenue, as said street is now used in the City of Elkhart; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO, Lots Numbered 349, 350, 351 and 352 as the said Lots are known and designated on the recorded Plat of Elliston's Addition, City of Elkhart; said plat being recorded in Plat Book 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO: Lot Number 300, as the said Lot is known and designated on the recorded Plat of Elliston Addition to the City of

Continued on next page

EXHIBIT A - CONT'D

Elkhart, Indiana; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO: Lots Numbered 326, 327 and 299, as said Lots are known and designated on the recorded Plat of Elliston Addition to the City of Elkhart, Indiana.

ALSO: Lot Number 329 as the same is known and designated on the recorded Plat of Elliston's First Addition to the City of Elkhart, Indiana; as recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO: Lot Number 301 as the said Lot is known and designated on the recorded Plat of Elliston's Addition to the City of Elkhart, Indiana; said Plat being recorded in Deed Record 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

ALSO: Ellistons Lots 302, 303 and 304 in Elkhart City Concord Township.

ALSO: Lots Numbered 327 and 328 as the said Lots are known and designated on the recorded Plat of Elliston Addition to the City of Elkhart, said Plat being recorded in Plat Book 111, page 188 in the Office of the Recorder of Elkhart County, Indiana.

END OF EXHIBIT A

Exhibit B

Privileged and Confidential
Attorney Work Product
Attorney-Client Communication

Environmental
Resources
Management

3352 128th Avenue
Holland, MI 49424-9203
(616) 399-3500
(616) 399-3777 (fax)
http://www.erm.com

4 August 2004

Mr. John R. Dresser, Esq.
Dresser, Dresser, Haas & Caywood, P.C.
112 South Monroe Street
Sturgis, Michigan 49091

Re: Site Investigation Summary Report
Patrick Paint, 1819 South 14th Street, Elkhart, Indiana

Dear Mr. Dresser:

Environmental Resources Management, Inc. (ERM) performed a site investigation of the above-referenced property consistent with our 23 June 2004 proposal. The objective of the investigation was to obtain site characterization information to assist Sturgis Iron & Metal Co., Inc. (SIM) in its purchase decision. Following is a discussion of the scope of the investigation, investigation methodology, data evaluation, and conclusions.

SCOPE OF INVESTIGATION

Based upon ERM's review of a 3 March 2000 *Phase I Environmental Site Assessment and Limited Compliance Review* prepared by ATC Associates, Inc., ERM selected sampling locations in areas of potential environmental concern. The targeted investigation areas and the borings that addressed these areas are presented in the following table (see Figure 1 in Attachment A for sample locations).

Area of Potential Concern	Boring(s)
Former Roll-Off Hopper (waste paints, solvents)	SB-9, SB-10
Former Outdoor Drum Storage	SB-11, SB-12
Empty Drum Storage Area	SB-3
Discharge Pipes/Depression	NA-groundwater sample only
Paint Room	SB-5, SB-6
Former Wastewater Treatment	SB-4
Wastewater Sludge Storage	SB-16
Waste Caustic Storage	SB-7
Hazardous Waste Storage	SB-7, SB-8
Flammables Building	SB-15
Former Waste Storage	SB-13, SB-14
Former Fuel Oil Tank	SB-2
Stressed Vegetation Area (non-specific)	SB-1
Waste Lubricating Oil/General Storage Area	SB-17

Note: Soil samples from SB-8, -9, -11 and -13 were not submitted for lab analysis

As proposed, at several locations, multiple borings were conducted to increase the probability of locating the areas of concern since precise location information was not available. Soil samples were screened to determine the possible "worst-case" sample for lab analysis from each particular area. Consequently, not all borings had samples collected for laboratory analysis (i.e., soil samples not submitted for analysis include SB-8 at the hazardous waste storage area, SB-9 at the former rolloff area, SB-11 at the former outdoor drum storage area, and SB-13 at the former waste storage area).

Groundwater samples were collected at six locations: TW-1 and TW-2 at the estimated "downgradient" side of the property; TW-3 at the empty drum storage area; TW-4 at the former rolloff storage area and "upgradient" side of the property; TW-5 at the drainage/outfall area; and TW-6 at the northwest side of the property.

INVESTIGATION METHODOLOGY

Borings were advanced with a Geoprobe® drill rig by Paramount Environmental Services of Portage, Indiana. Soil samples were collected continuously for geologic logging and screening with an iso butylene-calibrated photoionization detector (PID). The PID is capable of detecting volatile organic compounds (VOCs), albeit at a higher detection limit than in a laboratory analysis. PID readings were used to select the sample interval for laboratory-analyzed samples. Groundwater samples were collected from temporary wells set within the upper three feet of the water table, which was present at a depth of 15 feet below the natural grade of the site. Boring logs with field observations are presented in Attachment C.

Since there were no indications of potential contamination based on field screening of soil samples (PID readings were all 1 part per million/ppm or less and no visual indications such as staining were noted), all samples selected for laboratory analysis were from 0'-1' below grade, with the exception of SB-17. A coarser rust-colored sand was noted in SB-17 from 3' to 4' below grade, although no indications of contamination were observed. Soils encountered in borings conducted at the site consisted of fine and medium tan sands. At many locations, a trace of black sand/coal fragments was noted just beneath the surface. At SB-1, dried paint residue was noted to a depth of 1 foot beneath the asphalt-paved lot.

Samples collected for laboratory analysis were placed in clean, labeled jars and an iced cooler and transported to e-Lab of Holland, Michigan for analysis under chain-of-custody. Analytical parameters were selected based upon the following rationale:

- Volatile Organic Compounds - associated with solvent, petroleum hydrocarbon and paint usage;
- Polynuclear Aromatic Hydrocarbons (PAHs) - associated with petroleum hydrocarbons and former coal storage;
- Metals - associated with paint wastes, wastewater treatment, electroplating;
- Cyanide - associated with electroplating;
- Polychlorinated Biphenyls (PCBs) - associated with various industrial uses, transformers and other electrical equipment, waste oils, certain paint formulations.

All sampling and analytical methodologies were consistent with U.S. EPA and Indiana Department of Environmental Management (IDEM) protocol.

ANALYTICAL RESULTS

Analytical results are compared to Risk Integrated System of Closures (RISC) cleanup criteria generated by IDEM dated 1 January 2004. Cleanup criteria have been developed for residential and industrial/commercial land uses. The results in Tables 1 (soil) and 2 (groundwater) compare the analytical data for samples collected to both the default residential and industrial closure levels (Attachment B). Residential levels are presented for comparative purposes to levels safe for unrestricted (i.e., residential) land use. The industrial levels are presented for comparative purposes to levels safe for industrial land use. Comparison to residential criteria is made since these are the levels above which a property could be considered contaminated. The laboratory report is included in Attachment D.

Soil Data Evaluation

Exceedances of criteria (residential and/or industrial) were noted in SB-1, SB-3, SB-4, SB-12, SB-14, and SB-17. PCB data is not presented in Table 1 since none were detected.

SB-1: indications of paint waste were noted in this boring just beneath the surface; the metals arsenic, cadmium, hexavalent chromium, lead and zinc were detected above criteria;

SB-3: this boring was conducted in the former empty drum storage area; arsenic, lead and naphthalene were detected above criteria; none, however, exceeded industrial criteria;

SB-4: this boring was conducted in the former wastewater treatment area; arsenic was detected above criteria; however, the level was below industrial criteria;

SB-12: this boring was conducted in the former drum storage area; arsenic, benzene, benzo(a)pyrene and dibenzo(a,h)anthracene were detected above criteria; other hydrocarbons (VOCs and PAHs) were also detected but at levels below residential criteria;

SB-14: this boring was conducted in the former waste storage area; arsenic, trichloroethylene (TCE), and benzo(a)pyrene were detected above criteria; and

SB-17: this boring was conducted in the former oil storage area; lead and TCE were detected above criteria.

Groundwater Data Evaluation

As indicated in Table 2, exceedances of criteria (residential and/or industrial) were noted in TW-4 and TW-6. The common industrial solvents TCE and tetrachloroethylene (PCE) were detected in these groundwater samples (TCE only in TW-4). Metals and PAHs were not detected in groundwater at concentrations exceeding the criteria, which indicates that these soils containing these parameters are not leaching through the soil column to underlying groundwater to a significant degree (due in part to the presence of the building/pavement).

CONCLUSIONS

Following are ERM's conclusions from the site investigation:

1. Groundwater is contaminated with trichloroethylene (TCE), a common industrial solvent and degreaser. TCE was detected at TW-4 and TW-6. Some or all of the TCE could be migrating onto the property from an upgradient site (estimated groundwater flow

direction is northerly). Another common industrial solvent tetrachloroethylene was also detected in TW-6 at concentrations above criteria, and since this compound was not detected in TW-4, it may have been released on the subject property.

2. Soil samples collected from the subject property indicate TCE and benzene are present at concentrations exceeding criteria at several locations. The data suggests releases occurred to soil in the former waste storage area (SB-14), waste lubricating oil/ general storage area (SB-17), outside drum storage areas (SB-3 and -12), and the former waste dumpster area (SB-10/TW-4). Several metals and PAH compounds were also detected. Evidence of paint solids was noted in SB-1, where elevated metals were detected. No other waste materials or evidence of spills/releases were noted by ERM.

3. Although response activities (i.e., actions undertaken to reduce the contaminant concentrations and/or exposure risks) would be necessary to address the identified contaminants to levels that would require no further action by IDEM, there does not appear to be any current unacceptable risk for industrial use of the property. This is based upon the asphalt cover at SB-1 where direct contact risk levels are exceeded, the lack of groundwater use/consumption, and the lack of a threat to indoor air from volatilization of subsurface VOC-impacted soils. However, the source of the VOC impact has not been defined and higher concentrations may be present. Further investigation would be necessary to determine the necessary response activities to meet the IDEM cleanup criteria.

Please feel free to contact me at (616) 738-7340 if you have any questions regarding the proposed work. We appreciate the opportunity to be of service to you.

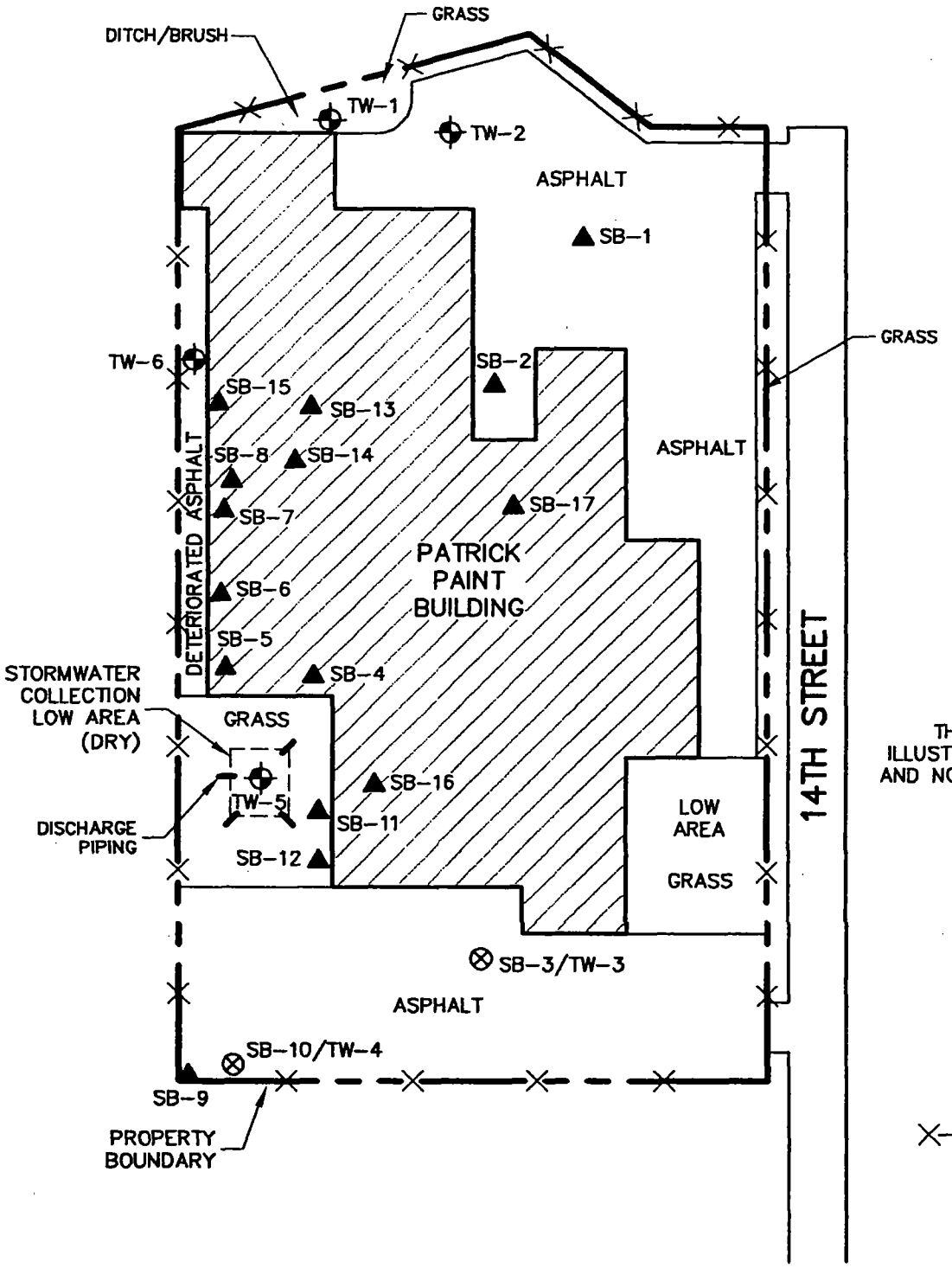
Sincerely,

Thomas P. O'Connell, P.E.
Principal-in-Charge

TPO:rmv
cc: File

Attachment A
Figure 1

SITE MAP WITH SAMPLING LOCATIONS



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FAK 7/12/04	**STURGIS IRON AND METAL CO.** PATRICK PAINT SITE 1819 14TH STREET, ELKHART, INDIANA	CADD Review RMK CHK'D 0019369
ERM.	Environmental Resources Management	FIGURE 1

Attachment B
Tables

Table 1 Soil Analytical Data Summary
Patrick Paint Site, 1819 14th Street, Elkhart, Indiana

Analyte	RISC Default Industrial Closure Levels[A]	RISC Default Residential Closure Levels[A]	SB-1 (0-1') 07/07/2004	SB-2 (0-1') 07/07/2004	SB-3 (0-1') 07/07/2004	SB-4 (0-1') 07/07/2004	SB-5 (0-1') 07/07/2004	SB-6 (0-1') 07/07/2004	SB-7 (0-1') 07/07/2004	SB-10 (0-1') 07/07/2004	SB-12 (0-1 07/08/200	
Metals (mg/kg):												
Aluminum	NA	NA	8,900	3,900	8,400	7,800	5,000	5,900	5,500	6,100	4,200	
Arsenic	20	3.9	88	2.5	8.2	5.1	2.1	2.5	2.5	2.2	12	
Cadmium	77	7.5	8.4	0.16	1.80	0.08	0.11	0.41	0.07	0.44	0.92	
Chromium, Hexavalent	120	38	56	0.61	2.2	< 0.53	1.0	2.1	0.74	0.69	1.3	
Chromium, Trivalent	10,000	10,000	< 0.59	9.3	14	11	14	11	6.7	8.1	5.0	
Copper	2,700	920	24	9.6	42	12	8.2	32	11	150	30	
Lead	230	81	700	17	100	8.1	23	23	6.6	75	48	
Magnesium	NA	NA	4,600	3,600	710	1,300	1,300	2,100	3,100	7,000	3,000	
Mercury	32	2.1	0.08	0.02	0.10	< 0.011	0.02	< 0.0092	< 0.016	0.01	0.03	
Nickel	2,700	950	32	7.50	13	11	21	8.1	9.3	10	9.2	
Silver	87	31	< 0.27	< 0.25	< 0.26	< 0.23	< 0.24	< 0.23	< 0.22	< 0.23	< 0.2	
Zinc	10,000	10,000	14,000	< 0.51	< 0.53	< 0.45	< 0.48	< 0.46	< 0.45	< 0.45	< 0.4	
VOCs (ug/kg):												
Benzene	350	34	< 54	< 43	< 57	< 43	< 43	< 44	< 43	< 43	57	
Chloroform	1,200	470	< 54	< 43	< 57	< 43	< 43	< 44	< 43	< 43	96	
Ethylbenzene	160,000	13,000	< 54	< 43	< 57	< 43	< 43	58	< 43	< 43	21	
m,p-Xylene	NA	NA	< 80	< 64	< 86	< 64	< 65	< 66	< 64	< 65	95	
o-Xylene	NA	NA	< 54	< 43	69	< 43	< 43	98	< 43	< 43	80	
Toluene	240,000	12,000	< 54	< 43	< 57	< 43	< 43	< 44	< 43	< 43	2,0	
Trichloroethene	82	57	< 54	< 43	< 57	< 43	< 43	< 44	< 43	< 43	<	
Xylenes, Total	170,000	170,000	< 120	< 96	< 130	< 96	< 97	< 99	< 97	< 97	1,	
PAHs (ug/kg):												
Acenaphthene	1,200,000	130,000	17	< 5.0	34	< 5.4	< 4.9	< 5.5	< 5.5	11	3	
Acenaphthylene	180,000	18,000	< 35	< 15	39	< 16	< 15	< 16	< 17	30		
Anthracene	51,000	51,000	130	< 10	130	< 11	< 9.8	< 11	< 11	33	2	
Benzo(a)anthracene	15,000	5,000	750	29	220	< 11	160	36	130	150	2	
Benzo(a)pyrene	1,500	500	400	31	190	< 11	90	74	100	240	1	
Benzo(b-k)fluoranthene[1]	15,000	5,000	430	65	410	< 22	150	120	110	500	3	
Benzo(g,h,i)perylene	16,000	16,000	140	21	70	< 11	55	18	25	77		
Chrysene	25,000	25,000	360	22	45	< 5.4	< 4.9	40	30	< 5.3		
Dibenzo(a,h)anthracene	1,500	500	< 120	< 10	41	< 11	18	< 11	< 11	41		
Fluoranthene	880,000	880,000	240	32	640	< 16	94	47	53	180	6	
Fluorene	1,100,000	170,000	35	< 10	32	< 11	< 9.8	< 11	13	19	380	
Indeno(1,2,3-cd)pyrene	3,100	3,100	130	18	74	< 11	46	18	21	90	1,700	
2-Methylnaphthalene	210,000	16,000	200	39	1,100	< 11	< 9.8	34	12	28	390	
Naphthalene	170,000	700	110	90	1,200	< 16	< 15	18	< 17	23	450	
Phenanthrene	170,000	13,000	450	47	540	< 27	61	90	89	280	2,900	9
Pyrene	570,000	570,000	1,100	50	270	< 16	220	70	93	310	3,800	1,900
Cyanide(mg/kg)												
Total[2]	9.6	0.94	< 0.59	< 0.53	< 0.57	< 0.53	< 0.50	< 0.52	< 0.54	< 0.51	< 0.55	< 0.53

Notes:

For simplification, only compounds detected at one or more locations are shown on this table. For full list of compounds analyzed see laboratory analytical reports.

(A) - From RISC Technical Guide Table A–Default Closure Table–January 1, 2004.

Shaded Values Exceed RISC Default Residential Closure Levels

Red-text values exceed RIS Default Industrial Closure Levels

1 Closure Levels are for Benzo(b)fluoranthene, results are for Benzo(b+k)fluoranthene

2 Closure Levels are for Free Cyanide, Sample results are for Total Cyanide

NA - Criteria Not Available

Ta 2 Groundwater Analytical Data Summary
Patrick Paint Site, 1819 14th Street, Elkhart, Indiana

Analyte	RISC Default Industrial Closure Levels(A)	RISC Default Residential Closure Levels(A)	TW-1 (11-16') 07/08/2004	TW-2 (15-16') 07/07/2004	TW-3 (14.5-18') 07/07/2004	TW-4 (15-18') 07/07/2004	TW-5 (9.5-12') 07/08/2004	TW-6 (15-18') 07/08/2004
Metals (mg/L)								
Chromium[1]	0.31	0.10	< 0.0020	0.0026	< 0.0020	< 0.0020	< 0.0020	< 0.0020
Copper	3.8	1.30	< 0.0010	0.0052	0.0013	0.0014	0.003	0.002
Cyanide, Total[2]	2.0	0.20	0.013	0.0078	< 0.0050	0.025	< 0.0050	< 0.0050
Magnesium	NA	NA	13	18	19	17	8.8	23
Nickel	2.0	0.73	0.031	< 0.025	< 0.025	< 0.025	< 0.025	< 0.025
VOCs (ug/L)								
Tetrachloroethene	55	5.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	7.4
Trichloroethene	7.2	5.0	< 1.0	< 1.0	< 1.0	22	< 1.0	27
PAHs (ug/L)								
Acenaphthene	4,200	460	< 0.25	6.9	< 0.25	< 0.25	< 0.25	< 0.26
Fluoranthene	210	210	< 0.50	6.7	< 0.50	< 0.50	< 0.50	< 0.51
Cyanide(mg/L)								
Total[2]	2.0	0.20	0.013	0.0078	< 0.0050	0.025	< 0.0050	< 0.0050

Notes:

For simplification, only compounds detected at one or more locations are shown on this table. For full list of compounds analyzed see laboratory analytical reports.

(A) - From RISC Technical Guide Table A--Default Closure Table--January 1, 2004.

1 Closure Levels are for Hexavalent Chromium, Sample results are for total Chromium

2 Closure Levels are for Free Cyanide, Sample results are for Total Cyanide

Shaded Values Exceed RISC Default Residential Closure Levels

Red text values exceed RIS Default Industrial Closure Levels

NA - Criteria Not Available

Privileged and Confidential
Attorney Work Product
Attorney-Client Communication

4 August 2004

Mr. John R. Dresser, Esq.
Dresser, Dresser, Haas & Caywood, P.C.
112 South Monroe Street
Sturgis, Michigan 49091

ERM

Re: Patrick Paint, 1819 South 14th Street, Elkhart, Indiana

Dear Mr. Dresser:

As a follow-up to our 4 August 2004 Site Investigation Letter Report, Environmental Resources Management, Inc. (ERM) is pleased to submit this proposed scope of work for undertaking additional site investigation at the property referenced above. The objective of the additional investigation is to further characterize areas of concern based on the initial investigation, and to identify contaminant source areas. This information would be used to prepare an estimate of response activities required to meet site Indiana Department of Environmental Management (IDEM) cleanup criteria. Following is a discussion of the areas of concern, our proposed scope of services, cost estimate and schedule for project execution.

The following locations were noted to have contaminant concentrations exceeding IDEM criteria. The recommendations for each area are also presented.

SB-1: Indications of paint waste were noted in this boring just beneath the surface; the metals arsenic, cadmium, hexavalent chromium, lead and zinc were detected above criteria.

Recommendation: Advance four soil borings around SB-1 to define the extent of paint waste. Since this can be accomplished visually, lab analysis will be minimized. Two soil samples will be collected from beneath the paint waste to determine if the underlying soil has been impacted. Deeper samples would also be collected but held in the lab for possible analysis pending the results of the upper samples. Lab analysis would include the metals of concern and PAHs.

SB-3: This boring was conducted in the former empty drum storage area; arsenic, lead and naphthalene were detected above criteria; none, however, exceeded industrial criteria.

Recommendation: Advance three soil borings around SB-3 to define the arsenic and PAH affected soils. Deeper samples would also be collected but held in the lab for possible analysis pending the results of the upper samples. Lab analysis would include three soil samples for the metals of concern, VOCs and PAHs.

SB-4: This boring was conducted in the former wastewater treatment area; arsenic was detected above criteria; however, the level was below industrial criteria.

Recommendation: Since arsenic was the only parameter detected above criteria and there were no indications of VOC or SVOC impact, no further assessment is recommended in this area.

SB-12: This boring was conducted in the former drum storage area; arsenic, benzene, benzo(a)pyrene and dibenzo(a,h)anthracene were detected above criteria; other hydrocarbons (VOCs and PAHs) were also detected but at levels below residential criteria.

Recommendation: Advance three soil borings around SB-12 to further define the extent of affected soils. Deeper samples would also be collected but held in the lab for possible analysis pending the results of the upper samples. Lab analysis would include three soil samples for the metals of concern, VOCs and PAHs.

SB-14: This boring was conducted in the former waste storage area; arsenic, trichloroethylene (TCE), and benzo(a)pyrene were detected above criteria.

Recommendation: Advance three soil borings around SB-14 to further define the extent of affected soils. Deeper samples would also be collected but held in the lab for possible analysis pending the results of the upper samples. Lab analysis would include three soil samples for the metals of concern, VOCs and PAHs.

SB-17: This boring was conducted in the former oil storage area; lead and TCE were detected above criteria.

Recommendation: Advance four soil borings around SB-17 to further define the extent of affected soils. Deeper samples would also be collected but held in the lab for possible analysis pending the results of the upper samples. Lab analysis would include four soil samples for the metals of concern and VOCs.

With respect to groundwater contamination, the chlorinated solvents detected tend to sink in an aquifer. Therefore, vertical aquifer profiling at three locations is recommended (near TW-4, TW-6 and north of SB-1). Profiling will consist of collecting samples at depths of approximately 7'-10' and 15'-18' into the aquifer. A total of six samples plus one shallow sample at the location north of SB-1 would be analyzed for VOCs. The vertical profiling data may also provide information regarding whether the source of the TCE is from an upgradient off-site location.

Borings would be completed with a pick-up mounted Geoprobe® drill rig using the same methodologies used during the initial investigation.

Following receipt of the analytical results, a report of findings would be prepared along with order-of-magnitude cost estimates to address the identified contamination.

ESTIMATE OF PROBABLE COST AND PROPOSED TERMS

The estimated probable cost to perform the proposed scope of work described above is $12,500. This cost is based on an estimated 2 days of field sampling and a 5-day laboratory turnaround. A cost breakdown is provided below.

Task	Details	Estimated Cost
1	Project Coordination	$500
2	Field Investigation • Geoprobe Drill Rig (2 days), Supplies • ERM Oversight, Sample Collection	$4,500
3	Laboratory Analyses	$6,000
4	Data analysis, Report Preparation	$1,500
	TOTAL ESTIMATED PROBABLE COST	$12,500

ERM would invoice for these services on a time-and-materials basis. Only those costs incurred by ERM will be charged, but they will not exceed the estimated probable cost without your prior approval. To avoid misunderstanding, it should be emphasized that the estimated probable cost is a budget estimate, based upon our present knowledge of the project, which is believed sufficient to cover the services described herein, but no guarantee is made or implied with respect to the actual cost of performing the project. The project budget assumes normal drilling conditions will be encountered, that access will be readily available to the proposed sampling locations, and that the concrete floor can be penetrated with the Geoprobe® rig. If abnormal

drilling conditions are encountered, you would be contacted to discuss implications to the budget. This project will be governed by ERM's November 1999 General Terms and Conditions, a copy of which is attached.

An Authorization Form is included with this proposal. If you would like us to perform the work as proposed, please sign and return the form to acknowledge your acceptance of our proposal and the attached Terms and Conditions. Unless otherwise instructed by you, the return of this Authorization Form will serve as our necessary authorization to proceed.

Please feel free to contact me at (616) 738-7340 if you have any questions regarding the proposed work. We appreciate the opportunity to be of service to you.

Sincerely,

Thomas P. O'Connell, P.E.
Principal-in-Charge

TPO:rmv
cc: File

A. U.S.DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

B.TYPE OF LOAN

1. [ ]FHA 2. [ ]FMHA 3. [ ]CONV. UNINS.
4. [ ]VA 5. [ ]CONV. INS.

6. FILE NUMBER: 042001449

7. LOAN NUMBER:

8. MTG. INS. CASE NO.:

NOTE: This form is furnished to give you a statement of actual settlement costs. Amounts paid to and by the settlement agent are shown. Items marked ("p.o.c.") were paid outside the closing: they are shown here for information purposes and are not included in the totals.

D. NAME OF BORROWER: STURGIS IRON AND METAL CO., INC.

ADDRESS:

E. NAME OF SELLER: Patrick Industries, Inc.

ADDRESS: SELLER TIN:

F. NAME OF LENDER:

ADDRESS:

G.PROPERTY LOCATION: Lot 349-352 ELLISTON ADDN (ALSO LTS 327-329 & 353-355)
1800, 1819 South 14th Street Elkhart IN 46517

H. SETTLEMENT AGENT: Century Title Services, LLC CLOSER: OUTSIDE CLOSING PHONE NUMBER: (574) 293-2341
ADDRESS: 401 W. High Street
Elkhart, Indiana 46516 SETTLEMENT AGENT TIN: 35-1431729

PLACE OF SETTLEMENT: Century Title Services, LLC PHONE NUMBER: (574) 293-2341
ADDRESS: 401 W. High Street
Elkhart, Indiana 46516

I.SETTLEMENT DATE
Closing date: 09/07/04
Proration date: 09/07/04

J. SUMMARY OF BORROWER'S TRANSACTION		K. SUMMARY OF SELLER'S TRANSACTION	
100. GROSS AMOUNT DUE FROM BORROWER:		400. GROSS AMOUNT DUE TO SELLER:	
101. Contract sales price	1,100,000.00	401. Contract sales price	1,100,000.00
102. Personal property		402. Personal property	
103. Settlement charges to borrower(line 1400)	185.00	403.	
10		404.	
1		405.	
Adjustments for items paid by seller in advance:		Adjustments for items paid for seller in advance:	
106. City/town taxes to		406. City/town taxes to	
107. County taxes to		407. County taxes to	
108. Assessments to		408. Assessments to	
109.		409.	
110.		410.	
111.		411.	
112.		412.	
120. GROSS AMOUNT DUE FROM BORROWER:	1,100,185.00	420. GROSS AMOUNT DUE TO SELLER:	1,100,000.00
200. AMOUNTS PAID BY OR IN BEHALF OF BORROWER:		500. REDUCTIONS IN AMOUNT DUE TO SELLER:	
201. Deposit or earnest money		501. Excess deposit(see instructions)	
202. Principal amount of new loan(s)		502. Settlement charges to seller(line 1400)	2,250.00
203. Existing loan(s) taken subject to		503. Existing loan(s) taken subject to	
204.		504. Payoff of first mortgage loan	
205.		505. Payoff of second mortgage loan	
206.		506.	
207.		507.	
208.		508.	
209.		509.	
Adjustments for items unpaid by seller:		Adjustments for items unpaid by seller:	
210. City/town taxes to		510. City/town taxes to	
211 County taxes 01/01/04 to 09/07/04	28,358.70	511. County taxes 01/01/04 to 09/07/04	28,358.70
2 ssessments to		512. Assessments to	
213.		513.	
214.		514.	
215.		515. 2003 Payable 2004	41,517.14
216.		516.	
217.		517.	
218.		518.	
219.		519.	
220. TOTAL PAID BY/FOR BORROWER:	28,358.70	520. TOTAL REDUCTION IN AMOUNT:	72,125.84
300. CASH AT SETTLEMENT FROM/TO BORROWER:		600. CASH AT SETTLEMENT TO/FROM SELLER:	
301. Gross amount due from borrower(line 120)	1,100,185.00	601. Gross amount due to seller(line 420)	1,100,000.00
302. Less amounts paid by/for borrower(line 220)	28,358.70	602. Less total reductions in amount due seller(line 520)	72,125.84
303. CASH [X FROM] [TO] BORROWER:	1,071,826.30	603. CASH [X TO] [FROM] SELLER:	1,027,874.16

SUBSTITUTE FORM 1099 SELLER STATEMENT-The information contained in Blocks E,G,H and I and on line 401 (or, if line 401 is asterisked, lines 403 and 404) is important tax information and is being furnished to the Internal Revenue Service. If you are required to file a return, a negligence penalty or other sanction will be imposed on you if this item is required to be reported and the IRS determines that it has not been reported.

SELLER INSTRUCTION-If this real estate was your principal residence, file Form 2119, Sale or Exchange of Principal Residence, for any gain, with your income tax return; for other transactions, complete the applicable parts of Form 4797, Form 6252 and/or Schedule D (Form 1040).

You are required by law to provide Three Rivers Title Company, Inc. with your correct taxpayer identification number.

If you do not provide Three Rivers Title Company, Inc. with your correct taxpayer identification number, you may be subject to civil or criminal penalties.

Under penalties of perjury, I certify that the number shown on this statement is my correct taxpayer identification number.

Andy Lineweth, Secretary

Seller

File 042001449

L. SETTLEMENT CHARGES

			PAID FROM BORROWER'S FUNDS AT SETTLEMENT	PAID FROM SELLER'S FUNDS AT SETTLEMENT
700. TOTAL SALES/BROKER'S COMMISION Based on $	@	% =		
Division of Commission (line 700) as follows:				
701. $	to			
7	to			
7. Commission paid at settlement				
704.				
800. ITEMS PAYABLE IN CONNECTION WITH LOAN.				
801. Loan Origination fee	%			
802. Loan Discount	%			
803. Appraisal fee	to			
804. Credit Report	to			
805. Lender's inspection fee	to			
806. Mortgage Insurance application fee	to			
807. Assumption Fee	to			
808.	to			
809.	to			
810.	to			
811.	to			
812.	to			
900. ITEMS REQUIRED BY LENDER TO BE PAID IN ADVANCE.				
901. Interest from to	@$	/day		
902. Mortgage insurance premium for	mo. to			
903. Hazard insurance premium for	yrs. to			
904.	yrs. to			
905.				
1000. RESERVES DEPOSITED WITH LENDER				
1001. Hazard Insurance	mo.@$	per mo.		
1002. Mortgage insurance	mo.@$	per mo.		
100 City property taxes	mo.@$	per mo.		
1 ounty property taxes	mo.@$	per mo.		
1005. Annual assessments (Maint.)	mo.@$	per mo.		
1006.	mo.@$	per mo.		
1007.	mo.@$	per mo.		
1008.				
1100. TITLE CHARGES:				
1101. Settlement or closing fee	to CENTURY TITLE SERVICES, LLC		150.00	150.00
1102. Abstract or title search	to			
1103. Title examination	to			
1104. Title insurance binder	to			
1105. Document preparation	to			
1106. Notary fee	to			
1107. Attorney's fee to	to			
(includes above items No.:				
1108. Title insurance	to CENTURY TITLE SERVICES, LLC			2,100.00
(includes above items No.:)				
1109. Lender's coverage	$			
1110. Owner's coverage 1,100,000.00	$ 2,100.00			
1111.	to			
1112.	to			
1113.	to			
1114.	to			
1200. GOVERNMENT RECORDING AND TRANSFER CHARGES				
1201. Recording fees: Deed $	Mrtg $	Rel. $		
City/county tax/stamps: Deed $	Mrtg $			
1203. State tax/stamps: Deed $	Mrtg $			
1204.	to			
1205.	to			
1206. Recording and Service Fees	to CENTURY TITLE SERVICES, LLC		35.00	
1300. ADDITIONAL SETTLEMENT CHARGES				
1301. Survey	to			
1302. Pest inspection	to			
1303.	to			
1304.	to			
1305.	to			
1400. TOTAL SETTLEMENT CHARGES (entered on lines 103, Section J and 502, Section K)			185.00	2,250.00

CERTIFICATION: I have carefully reviewed the HUD-1 Settlement Statement and to the best of my knowledge and belief, it is a true and accurate statement of all receipts and disbursements made on my account or by me in this transaction. I further certify that I have received a copy of HUD-1 Settlement Statement.

Ralph Lewis, PRESIDENT
Borrowers

Sellers

The HUD-1 Settlement Statement which I have prepared is a true and accurate account of this transaction. I have caused or will cause the funds to be disbursed in accordance with this statement.

Edward W Hardesty
Settlement Agent

9-7-04
Date

WARNING: It is a crime to knowingly make false statements to the United States on this or any other similar form. Penalties upon conviction can include a fine and imprisonment. For details see: Title 18: U.S. Code Section 1001 and Section 1010.

SALES DISCLOSURE FORM

State Form 46021 (R3/1-00)
Approved by State Board of Accounts, 2000
Prescribed by the State Board of Tax Commissioners, 1999
Pursuant to IC 6-1.1-5.5

Part 1 - To be completed by BUYER and SELLER (see instructions on reverse side)

SELLER

First name(s)	M.I.(s)	Last name(s)
Patrick Industries, Inc.		

Address (number and street)	Primary residence?
1800 S. 14th Street	☐ Yes ☒ No

City, Town or Post Office	State	ZIP code
Elkhart.	IN	46516

BUYER

First name(s)	M.I.(s)	Last name(s)
Sturgis Iron & Metal Co., Inc.		

Address (number and street)	Primary residence?
1514 W. Lusher Ave.	☐ Yes ☐ No

City, Town or Post Office	State	ZIP code
Elkhart	IN	46516

Send tax bills and notices to this address?	If no, provide mailing address (number and street, city, state, ZIP code)
☐ Yes ☒ No	P.O. Box 579, Sturgis, Mi. 49091

PROPERTY TRANSFERRED

Street address		
1800 & 1819 S. 14th St., 1313 Wolf Ave. and vacant land		
City, Town or Post Office	State	ZIP code
Elkhart	IN	46516
County	Township	School Corporation Name
Elkhart	Concord	Elkhart

EXEMPT TRANSACTIONS (see Instructions on reverse side)

Exempt Transaction?	If yes, specify the number of the exemption. (see "Exempt Transactions" on reverse side)
☐ Yes ☒ No	

SALES INFORMATION

DATE OF SALE									1. Total sales price	$ 1,100,000
Month		Day		Year					2. Seller paid points	$ (-0-)
0	9	0	7	2	0	0	4		3. Net sales price (line 1 minus line 2)	$ 1,100,00

Check ALL of the following conditions that apply to this sale.

☒ Transfer of entire parcel ☒ Purchase of adjoining land ☐ Vacant land ☐ Exchange for other real property ("Trade")

☐ Seller provided financing ☐ Mobile home ☐ Condominium ☐ Split(s)

☐ Existence of family or business relationship between buyer and seller ☐ Personal property included in transfer (Estimated value $_____)

Describe any unusual or special circumstances related to this sale, including the specification of any less-than-complete ownership interest, and the terms of any seller financing.

PART 2 - To be completed by COUNTY AUDITOR (see instructions on reverse side)

County Auditor must verify and complete the following information:

☐ Buyer and Seller Information ☐ Sales price ☐ Parcel / Key number _____

☐ Address of property transferred ☐ Conditions of sale ☐ School corporation number _____

te of sale/transfer ☐ Warranty deed? ☐ YES ☐ NO

PART 3 - To be completed by COUNTY ASSESSOR (see instructions on reverse side)

County Assessor must verify and complete the following information:

☐ Significant physical changes to property between March 1 and date of sale

☐ Current property record card attached

☐ Property class / use code _____

ASSESSED VALUE (AV) INFORMATION	
AV LAND	$
AV IMPROVEMENT(S)	$
AV TOTAL	$

PART 4 - Signature and Verification Section (see instructions on reverse side)

The parties to a real property conveyance are required to file this form and attest in writing and under the penalties of perjury that the information contained herein is true and correct. A person who knowingly and intentionally falsifies or omits any information required on this form commits a Class A infraction.

Under penalties of perjury, I hereby certify that this Sales Disclosure, to the best of my knowledge and belief, is true, correct and complete as required by law, and is prepared in accordance with IC 6-1.1-5.5, "Real Property Sales Disclosure Act."

Signature of Seller or representative	Telephone number	Date signed (month, day, year)
[signature] VP Finance	574-294-7511	9/7/04
Signature of Buyer or representative	Telephone number	Date signed (month, day, year)
Ralph Lewin, President	574-295-0155	9/7/04

CASE NO. 042001449

VENDOR'S AFFIDAVIT

STATE OF INDIANA)
) SS:
COUNTY OF Elkhart)

Andy L. Nemeth the Secretary of Patrick Industries, Inc., an Indiana corporation, and, being first duly sworn state[s] that Patrick Industries, Inc., an Indiana corporation, and (hereinafter referred to, jointly and severally, as "Vendor") is/are this day conveying to STURGIS IRON AND METAL CO., INC. (hereinafter referred to, jointly and severally, as "Purchaser"), by Warranty deed, the following described Real Estate located in Elkhart County, Indiana:

SEE EXHIBIT "A" ATTACHED

and commonly known as 1800, 1819 South 14th Street, Elkhart, IN 46517 (hereinafter referred to as "Real Estate").

In connection with the sale of the Real Estate, Vendor has furnished Purchaser with a commitment for an owner's policy of title insurance for the Real Estate under date of August 19th, 2004, issued by as number 042001449.

Vendor has an indefeasible estate in fee simple in the Real Estate; and the Real Estate is free and clear of every kind or description of lien, lease or encumbrance except the following:

1. Easements, agreements and restrictions of record disclosed in said commitment.

2. Current taxes not delinquent.

3. Whatever matters affecting the Real Estate, if any, are disclosed in the above deed.

Vendor has not executed, or permitted anyone in Vendor's behalf to execute, any conveyance, mortgage, lien, lease, security agreement, financing statement or encumbrance of or upon the Real Estate or any fixtures attached thereto, except as stated above, which is now outstanding or enforceable against the Real Estate. Vendor has made no contract to sell all or a part of the Real Estate to any person other than the Purchaser, and Vendor has not given to any person an option to purchase all or any part of the Real Estate, which is enforceable or exercisable now or at any time in the future. There are no unpaid claims for labor done upon or materials furnished for the Real Estate in respect of which liens have been or may be filed. The improvements upon the Real Estate are all located entirely within the bounds of the Real Estate, and there are no encroachments thereon. There are no existing violations of zoning ordinances or other restrictions applicable to the Real Estate.

There is no judgment of any court of the State of Indiana or of any court of the United States that is or may become a lien on the Real Estate. No petition for bankruptcy has been filed by or against Vendor within the last six months, nor is any petition now pending with respect to Vendor for bankruptcy, insolvency or incompetency. Vendor is neither principal nor surety on any bond payable to the State of Indiana.

The Real Estate is now in possession of Patrick Industries, Inc., an Indiana corporation, and as owner(s) and no other person has a right to possession or claims possession of all or any part of the Real Estate. Vendor will deliver possession of Real Estate to Purchaser on or before September 7, 2004, free and clear of any right or claim of any person to the possession of the Real Estate except none.

Vendor is not acting, directly or indirectly, in any capacity whatsoever for any foreign country or national thereof,

and Vendor is
a corporation duly in good standing under the laws of Indiana, and the persons executing this affidavit and the deed on behalf of Vendor are duly elected officers of Vendor and have been fully empowered by proper resolution of the Board of Directors of Vendor to execute and deliver this affidavit and the deed; and Vendor has full corporate capacity to convey the real estate described herein and all necessary corporate action for making of such conveyance has been taken and done.

Vendor intends that each of the statements made herein shall be construed as a representation; each of the representations is made for the purpose of inducing Purchaser to purchase the Real Estate; and each of the representations, whether construed jointly or severally, is true. Vendor expressly authorizes Purchaser and all other persons to rely on such representations.

Patrick Induistries, Inc.
AN Indiana Corporation

BY VP Finance
Andy Nemeth

SWORN TO AND SUBSCRIBED before me by said Affiant before me, a Notary Public in and for said County and State this 7th day of September, 2004.

Edward W Hardig Jr
Notary Public
A Resident of St. Jospeh Co., IN

My Commission Expires:

NOTARY PUBLIC SEAL STATE OF INDIANA
EDWARD W. HARDIG, Jr, Notary Public
A Resident of St. Joseph County, IN
My Commission Expires: 05-14-2008

EXHIBIT 5

Listing Broker (Co.) A Progressive Realty (95 office code) By Steve Stose (2487 individual code)
Selling Broker (Co.) A Progressive Realty (95 office code) By Steve Stose (2487 individual code)

PURCHASE AGREEMENT
COMMERCIAL-INDUSTRIAL REAL ESTATE

A. PARTIES: Rick & Nona Hollar ("Seller")
agrees to sell and convey to RII, LLC OR ITs Assignee entity ("Buyer")
and Buyer agrees to buy from Seller the following property for the consideration and subject to the following:

B. PROPERTY: The property is commonly known as 1631 Oakland
in Concord Township, Elkhart County, Elkhart, Indiana,
including all buildings and permanent improvements and fixtures attached owned by Seller; all privileges, easements and appurtenances pertaining thereto including any right, title and interest of Seller in and to adjacent streets, alleys, rights-of-way, leases, rents, security deposits, licenses and permits with respect to the property, trade name, and warranties or guaranties relating to the property being sold, and any personal property specified herein; all of the above referred to as the "Property," the legal description of which is ☒ (attached as Exhibit "A") ☐ (described as follows):
; subject to exact determination by survey pursuant to Paragraph J.
The following items of personal property are INCLUDED in the sale: -0-
All other personal property and the following additional items are EXCLUDED from the sale: -0-

C. PRICE: The purchase price shall be Four Hundred Thousand Dollars ($ 400,000.00), payable ☒ (in cash at closing) ☐ (in accordance with the terms and conditions in this Agreement).

D. EARNEST MONEY: Buyer submits $ 10,000.00 as Earnest Money to be held by A Progressive Realty Steve Stose as Escrow Agent, upon execution of this Agreement by both parties. The Earnest Money shall be applied to the purchase price at closing unless returned to Buyer, released to Seller, or otherwise disbursed in accordance with this Agreement. The Escrow Agent is not a party to this Agreement and does not assume or have any liability for performance or non-performance of any party. Before the Escrow Agent has any obligation to disburse the Earnest Money in the event of dispute, Escrow Agent has the right to require from all parties a written release of liability of the Escrow Agent, termination of the Agreement and authorization or court order to disburse the Earnest Money.

E. ADDITIONAL PROVISIONS: Buyers possession To Be within 60 days After Closing
"MAY" Be part of A 1031 TAX Exchange

Included in this Agreement are the following addenda: **(Place an "X" on the appropriate line or lines)**

X Financing Addendum	____ Feasibility Study Addendum
____ Leased Property Addendum	____ Exchange Addendum
X Zoning/Governmental Approval Addendum	____ Representations & Warranties of Seller Addendum
____ Alternative Dispute Resolution Addendum	____ Lead-Based Paint Disclosure Addendum
____ Addendum to Purchase Agreement	

F. CLOSING: The closing of the sale shall take place at ☒ (the Title Company) ☐ (Meridian Title Elkhart IN) on or before February 24, 2005 or within ____ days after the end of the Due Diligence Period, whichever is later, (the "Closing Date") or this Agreement shall terminate unless the Closing Date is changed in writing by Seller and Buyer, or otherwise extended pursuant to this Agreement.

G. POSSESSION: The possession of the Property shall be delivered to Buyer, subject to the rights of tenants in possession, if any, in its present condition, ordinary wear and tear excepted, on the Closing Date. Seller shall maintain the Property, including fixtures, equipment and any included personal property in its present condition until possession is delivered to Buyer.

____ (office use only)

gressive Realty 23929 US 33 East Elkhart, IN 46517
(574) 875 - 5149 Fax: (574) 875 - 6002 Deborah Kauffman Stose
Produced with ZipForm™ by RE FormsNet, LLC 18025 Fifteen Mile Road, Clinton Township, Michigan 48035, (800) 383-0805

H. **REAL ESTATE TAXES: (Check paragraph 1, 2, or 3 below)**

☒ **1. Current Year (Lien Basis in Arrears) Indiana Customary Proration:** The taxes assessed for the current year, due and payable in the year following closing, shall be prorated between Seller and Buyer on a calendar year basis as of the day immediately prior to the Closing Date. All taxes assessed for any prior calendar year and remaining unpaid shall also be paid by Seller.

☐ **2. ~~Prior Year~~ (Cash Basis) Proration When Taxes Are Paid:** The taxes assessed for the year prior to closing, ~~due and~~ payable during ~~the year of~~ closing, shall be prorated between Seller and Buyer on a ~~calendar year basis as of the day~~ immediately prior to the Closing Date. ~~Buyer shall be responsible for all taxes assessed for the current year~~ due and payable in the year following closing.

☐ **3. Installment Basis: ~~Buyer will assume and pay all taxes~~** on the Property beginning ~~with the tax installment~~ due and ~~payable on~~ _____, _____, and all taxes due thereafter. Seller shall pay all taxes ~~for the Property due and payable~~ before such tax installment not assumed by Buyer.

For Purposes of 1, 2, and 3 above:

(A) If the tax rate or assessment for taxes assessed or payable in the year of closing has not been determined as of the Closing Date, the assessment or rate shall be assumed to be the same as the most recent assessment or rate.

(B) Taxes which are Seller's responsibility and not yet due as of the Closing Date shall be credited against the purchase price or cash portion thereof payable by Buyer at closing, and Seller shall have no further liability for such taxes.

(C) All taxes due and payable on or prior to the Closing Date shall be paid at or before closing and charged at closing to the responsible party.

(D) Buyer shall have the right to assume control and responsibility of all real estate tax appeals, and any rebates, refunds or credits shall be prorated between Seller and Buyer as of the Closing Date.

(NOTE: The succeeding year's tax bill for recently constructed buildings or following reassessment periods may greatly exceed the last tax bill available to the closing agent.)

I. **INSURANCE AND RISK OF LOSS:** Seller shall maintain replacement cost (if available) or actual cash value "all risk" insurance on the Property through the Closing Date. Seller's insurance shall be canceled as of the Closing Date and Buyer shall provide its own insurance thereafter. Risk of loss by damage or destruction to the Property prior to the closing shall be borne by Seller. In the event any damage or destruction is not fully repaired prior to closing, Buyer, at its option, may either terminate this Agreement or elect to close the transaction, in which event Seller's right to all insurance proceeds not yet applied to repair of the damage or destruction shall be assigned in writing by Seller to Buyer at closing. Seller shall reimburse Buyer at closing for any insurance deductible.

J. **CONDITIONS TO CLOSING:** Buyer's obligations under this Agreement are conditioned upon satisfaction of each of the following items which are for the Buyer's benefit and may be waived by Buyer at Buyer's sole discretion within 7 days from the last date between Seller and Buyer of this Agreement or any counter-offers (the "Due Diligence Period").

1. Title Commitment: A commitment for title insurance (the "Commitment") issued by a reputable title insurance company selected or approved by Buyer (the "Title Company") showing marketable title in Seller's name shall be ordered by ☒ **(Seller)** ☐ **(Buyer)** promptly upon acceptance of this Agreement and shall be delivered to Buyer within 14 days after ACCEPTANCE. At Buyer's request, legible copies of all recorded instruments affecting the Property ~~or recited as exceptions in the Commitment~~ shall also be delivered.

2. Survey: A survey shall be ordered promptly upon acceptance of this Agreement and shall be furnished at ☐ **(Seller's)** ☒ **(Buyer's)** expense within _____ days after _____. It shall be prepared by a licensed Indiana surveyor selected or approved by Buyer, shall comply with requirements for ALTA Surveys, including optional requirements from Table A, shall reflect whether the Property is located in a designated flood zone area and shall be certified to Buyer, the Title Company and Buyer's lender.

3. Title and Survey Approval: If Buyer has an objection to items disclosed in the Commitment or the survey, Buyer shall make written objections to Seller within 14 days after receipt of both the Commitment and survey. Upon the expiration of such period, any item not objected to by Buyer or subsequently approved by Buyer in writing shall be deemed a permitted exception ("Permitted Exception"). If Buyer makes objections, Seller shall have thirty (30) days from the date the objections are made to cure the same, and the Closing Date shall be extended, if necessary. Seller agrees to utilize its best efforts and reasonable diligence to cure any objections, but only to the extent necessary to convey marketable title. If the objections are not satisfied within the time period, Buyer may either terminate this Agreement and receive a refund of the Earnest Money or waive the unsatisfied objections and close the transaction.

4. Inspections: (Check paragraph (A) and/or (B) or paragraph (C) below) Unless Buyer waives inspections under paragraph (C), Buyer shall have determined that the Property has no unacceptable, adverse environmental or physical condition as provided below.

☒ (A) **Environmental Assessment:** A Phase I environmental site assessment ("Phase I") on the Property shall be ordered by ☐ **(Seller)** ☒ **(Buyer)** promptly upon acceptance of this Agreement at ☐ **(Seller's)** ☒ **(Buyer's)** expense from a reputable, qualified engineer, acceptable to Buyer. The Phase I shall be conducted in accordance with current ASTM standards unless otherwise agreed and may also include at Buyer's option the following matters:

(1) an investigation for the presence of asbestos, radon, lead or polychlorinated biphenyls (PCBs) on the Property; and/or

(2) an investigation to determine if the Property is located in any regulated or protected area under the jurisdiction of the U.S. Army Corps of Engineers, the U.S. Environmental Protection Agency, the Indiana Department of Environmental Management, the Indiana Department of Natural Resources, the U.S. Fish and Wildlife Service or any other federal, state or local agency.

If Buyer does not make a written objection to any problem(s) revealed in the report within 14 days of the date Buyer receives the FINAL WRITTEN REPORT, the Property shall be deemed to be acceptable. If Buyer determines that the

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environmental condition is unsatisfactory, Seller shall have a reasonable period of time, not to exceed 60 days days, to remediate the condition to Buyer's satisfaction and the Closing Date shall be extended, if necessary. If Seller fails or refuses to remediate, Buyer may either terminate this Agreement and receive a refund of the Earnest Money or waive its objection and close the transaction.

☐ (B) **Physical Inspections:** Promptly upon acceptance of this Agreement, all physical inspections shall be ordered at ☐ **(Seller's)** ☐ **(Buyer's)** expense. Inspections shall be made by qualified inspectors or contractors, selected or approved by Buyer, with written reports delivered to Seller and Buyer. Inspections may include but are not limited to the following: heating, cooling, electrical, plumbing, roof, walls, ceilings, floors, foundation, basement, crawl space, mold, water, storm and waste sewer, well/septic, geotechnical, other:_____. If Buyer, in its reasonable discretion, believes that an Inspection report reveals a major defect in or with the Property, Buyer shall report such defect in writing to Seller within _____ days of _____. If Buyer does not make a written objection to any problem(s) revealed in the report(s) within such time period, the Property shall be deemed acceptable to Buyer. Seller shall have a reasonable period of time, not to exceed _____ days, to repair any such major defect to Buyer's reasonable satisfaction and the Closing Date shall be extended, if necessary. If Seller fails or refuses to repair, Buyer may either terminate this Agreement and receive a refund of the Earnest Money or waive its objection and close the transaction.

☐ (C) **Waiver of Inspections:** BUYER HAS BEEN MADE AWARE THAT INDEPENDENT INSPECTIONS DISCLOSING THE CONDITION OF THE PROPERTY ARE AVAILABLE, AND BUYER HAS BEEN AFFORDED THE OPPORTUNITY TO REQUIRE SUCH INSPECTIONS AS A CONDITION OF THIS AGREEMENT. HOWEVER, BUYER WAIVES THE RIGHT TO OBTAIN INSPECTIONS AND RELIES UPON THE CONDITION OF THE PROPERTY BASED UPON BUYER'S OWN EXAMINATION AND RELEASES SELLER AND LISTING AND SELLING BROKER(S) FROM ANY AND ALL LIABILITY RELATING TO ANY PROBLEM, DEFECT OR DEFICIENCY AFFECTING THE PROPERTY, WHICH RELEASE SHALL SURVIVE THE CLOSING.

Buyer and its agents shall have the right to enter upon the Property upon reasonable advance notice and make all inspections provided for herein. Buyer shall restore any damage to the Property resulting from the entry of Buyer or its agents and shall indemnify, defend and hold harmless Seller as to any injury to persons or damage to their property resulting from the negligence of Buyer or its agents in conducting their activities on the Property. pd By Seller

K. **PRORATIONS AND SPECIAL ASSESSMENTS:** Interest on any debt assumed or taken subject to, any rents, all other income and ordinary operating expenses of the Property, including but not limited to, public utility charges, shall be prorated as of the day prior to the Closing Date. Any special assessments applicable to the Property for municipal improvements made to benefit the Property prior to the date of acceptance of this Agreement shall be paid by Seller at or before closing. At closing, Buyer will assume and agree to pay all special assessments for municipal improvements which are completed after acceptance of this Agreement.

L. **SALES EXPENSES:** All sales expenses are to be paid in cash prior to or at the closing.

1. **Seller's Expenses:** Seller shall pay all costs of releasing existing loans and recording the releases, one-half (1/2) of any closing fee, preparation of Deed and Vendor's Affidavit, Indiana Gross Income Tax, and other expenses stipulated to be paid by Seller under other provisions of this Agreement. Seller is Solely Responsible For Payment of Real Estate Commission
2. **Buyer's Expenses:** Buyer shall pay all expenses incident to any new or assumed loan, one-half (1/2) of any closing fee, and expenses stipulated to be paid by Buyer under other provisions of this Agreement.

M. **DEFAULT:** If Buyer breaches this Agreement, Seller may seek any remedy provided by law or equity, or terminate this Agreement and receive the Earnest Money as liquidated damages. If Seller breaches this Agreement, Buyer may terminate this Agreement and receive a refund of the Earnest Money, or Buyer may seek specific performance or any other remedy provided by law or equity. In the event of Seller default, Seller shall immediately be obligated to pay all brokerage commissions that would have been paid had this transaction closed. In the event of Buyer default, commissions may also be due and payable pursuant to the terms of the applicable brokerage agreements, By Seller.

N. **DUTIES OF BUYER AND SELLER AT CLOSING:**

1. At the closing, Seller shall deliver to Buyer, at Seller's sole cost and expense, the following:

(A) A duly executed and acknowledged WARRANTY Deed conveying marketable title in fee simple to all of the Property, free and clear of any and all liens, encumbrances, conditions, easements, assessments, reservations and restrictions, except Permitted Exception(s);

(B) An Owner's Policy of Title Insurance (the "Title Policy") issued by the Title Company in the amount of the purchase price, dated as of closing, insuring Buyer's fee simple title to the Property to be marketable subject only to the Permitted Exception(s), and deleting the standard printed exceptions contained in the usual form of the Title Policy;

(C) An executed Vendor's Affidavit in form acceptable to the Title Company;

(D) A Bill of Sale, duly executed by Seller, containing warranties of title, conveying title, free and clear of all liens, to any personal property specified in Paragraph B;

(E) An assignment, duly executed by Seller, of leases, prepaid rents, security deposits, and trade name, and to the extent assignable, licenses and permits, warranties or guarantees, and to the extent agreed to be assumed by Buyer, all service, maintenance, management or other contracts relating to the ownership or operation of the Property. Such assignment shall include an indemnity from Seller in favor of Buyer with respect to all claims and obligations arising under such leases and contracts prior to the Closing Date. If Buyer does not agree to assume any such contract, then Seller shall deliver evidence of termination of such contract at closing and shall indemnify Buyer as to all claims and obligations thereunder;

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(F) A current rent roll duly certified by Seller and any security or tenant deposits, if applicable;
(G) Evidence of its capacity and authority for the closing of this transaction;
(H) Certification establishing that no federal income tax is required to be withheld under the Foreign Investment and Real Property Tax Act, or consent to withhold tax from the proceeds of sale as required, unless it is established that the transaction is exempt;
(I) All other executed documents necessary to close this transaction.

2. At the closing, Buyer shall perform, at Buyer's sole cost and expense, the following:

(A) Pay the cash portion of the purchase price in the form of a cashier's check or other immediately available funds;
(B) Execute any note(s) and mortgage(s) and cause the funds to be made available to the closing agent for disbursement;
(C) Provide evidence of its capacity and authority for the closing of this transaction;
(D) Provide to Buyer's lender any title policy as required by the holder(s) of the mortgage(s);
(E) ~~An assumption agreement by Buyer (which may be included in Seller's assignment pursuant to Paragraph N.1(E) above) with respect to leases assigned to Buyer and contracts, if any, which Buyer has agreed to assume. Such assumption agreement shall include an indemnity from Buyer in favor of Seller as to claims and obligations arising under such leases and contracts assumed~~ by Buyer from and after the ~~Closing Date~~;
(F) Execute all other documents necessary to close this transaction, which are within Buyers Power

O. CONDEMNATION: Seller shall promptly notify Buyer in writing of the commencement of any condemnation proceedings against any portion of the Property. If such condemnation proceedings are commenced, Buyer, at its option, may (1) terminate this Agreement by written notice to Seller within seven (7) days after Buyer is advised of the commencement of condemnation proceedings, or (2) appear and defend in any condemnation proceedings, and any award shall, at Buyer's election, (a) become the property of Seller and reduce the purchase price by the same amount or (b) shall become the property of Buyer and the purchase price shall not be reduced.

P. RESPONSIBLE PROPERTY TRANSFER LAW:

1. Seller is not required to provide Buyer with a Disclosure Statement pursuant to I.C. Section 13-25-3-1 et seq., Indiana's Responsible Property Transfer Law ("IRPTL"), because, to the best of Seller's knowledge, the Property is exempt from the provisions of the law or (a) the Property does not contain any hazardous chemical or material which must be disclosed under the Federal Emergency Planning and Community Right-to-Know Act of 1986; (b) the Property does not contain any underground storage tanks which are or have been utilized to hold petroleum or other regulated substances; and (c) the or Buyer Property is not listed on the Comprehensive Environmental Response, Compensation and Liability Information System.
2. If Seller learns that the Property comes within the terms of IRPTL after execution of this Agreement, then Seller shall provide to Buyer the required disclosure document and comply with all other parts of this law.

Q. MISCELLANEOUS:

1. Any notice required or permitted to be delivered shall be deemed received when personally delivered or when confirmed as received by facsimile (with a copy sent by United States mail), express courier or United States mail (postage prepaid, certified and return receipt requested) addressed to Seller or Buyer or their designee at the address set forth below the signature of each party.
2. This Agreement shall be construed in accordance with the laws of the State of Indiana.
3. Time is of the essence. Time periods specified in this Agreement and any addenda are calendar days and shall expire at midnight of the date stated unless the parties agree otherwise in writing.
4. This Agreement is binding upon and for the benefit of the parties' respective heirs, administrators, executors, legal representatives, successors, and assigns. No assignment of this Agreement shall release a party from liability for its obligations hereunder.
5. If any provision contained in this Agreement is held invalid, illegal, or unenforceable in any respect, the invalidity, illegality, or unenforceability shall not affect any other provision.
6. This Agreement constitutes the entire agreement of the parties and cannot be changed except by their written consent.
7. By signing below, the parties to this transaction acknowledge receipt of a copy of this Agreement and give their permission to a Multiple Listing Service or other advertising media, if any, to publish information regarding this transaction.
8. Broker(s) may refer Buyer or Seller to other professionals, service providers or product vendors, including lenders, loan brokers, title insurers, escrow companies, inspectors, surveyors, engineers, consultants, environmental inspectors and contractors. Broker(s) has no responsibility for the performance of any service provider and/or inspector. Buyer and Seller are free to select providers/inspectors other than those referred or recommended to them by Broker(s).
9. Buyer discloses to Seller that Buyer is licensed and holds License # ⊖. Seller discloses to Buyer that Seller is licensed and holds License # ⊖.
10. Where the word "Broker" appears, it shall mean "Licensee" as provided in I.C. 25-34.1-10-6.8.
11. Any party who is the prevailing party against any other party in any legal or equitable proceeding relating to this Agreement shall be entitled to recover court costs and reasonable attorney fees from the non-prevailing party.
12. The parties agree that this Agreement may be transmitted between them electronically or digitally. The parties intend that electronically or digitally transmitted signatures constitute original signatures and are binding on the parties. The original document shall be promptly executed and/or delivered. This Agreement may be executed simultaneously or in two or more counterparts, each of which shall be deemed an original, but all of which together shall constitute one and the same instrument.
13. Each person executing this Agreement on behalf of a party represents and warrants that he or she has been authorized by all necessary action to execute and deliver this Agreement on behalf of such party.

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R. **CONSULT YOUR ADVISORS:** Buyer and Seller acknowledge they have been advised that, prior to signing this document, they should seek the advice of an attorney for the legal or tax consequences of this document and the transaction to which it relates. In any real estate transaction, it is recommended that you consult with a professional, such as a civil engineer, environmental engineer, or other person, with experience in evaluating the condition of the property, including the possible presence of asbestos, hazardous and/or toxic materials and underground storage tanks.

S. **CONFIRMATION OF AGENCY RELATIONSHIPS:** Buyer and Seller acknowledge that each has received agency office policy disclosures, had agency explained and now confirm their agency relationships. Buyer and Seller further acknowledge that they understand and accept agency relationships involved in this transaction.

T. **TERMINATION OF OFFER:** Unless accepted by Seller and delivered to Buyer by _____ ☐ (A.M.) ☐ (P.M.) ☐ (Noon), the _____ day of _____, _____, this Purchase Agreement shall be null and void and all parties shall be released of any and all liability or obligations.

X
BUYER'S SIGNATURE By Ralph Levin DATE

BUYER'S SIGNATURE DATE

RII LLC
PRINTED By Ralph Levin

PRINTED

BUYER'S SOCIAL SECURITY #/FEDERAL ID #

BUYER'S SOCIAL SECURITY #/FEDERAL ID #

269-651-7851 Office
269-651-4189 FAX
(AREA CODE) TELEPHONE NUMBER/FAX NUMBER

(AREA CODE) TELEPHONE NUMBER/FAX NUMBER

70675 S. Centerville Rd P.O Box 579 Sturgis, Mich 49091
BUYER'S ADDRESS FOR NOTICE PURPOSES

ACCEPTANCE OF PURCHASE AGREEMENT

Seller accepts the offer made by Buyer as set forth above, without change or condition at _____ ☐ (A.M.) ☐ (P.M.) ☐ (Noon) on the _____ day of _____, _____.

X
SELLER'S SIGNATURE

X
SELLER'S SIGNATURE

Rick Hollar
PRINTED 574-536-5644 Cell

Nona Hollar
PRINTED

574-522-2855 FAX
(AREA CODE) TELEPHONE NUMBER/FAX NUMBER

(AREA CODE) TELEPHONE NUMBER/FAX NUMBER

SELLER'S SOCIAL SECURITY #/FEDERAL ID #

SELLER'S SOCIAL SECURITY #/FEDERAL ID #

SELLER'S ADDRESS FOR NOTICE PURPOSES

Approved by and restricted to use by members of the Indiana Association of REALTORS®, Inc.
This is a legally binding contract, seek legal advice if not understood. Form # F05. Copyright IAR 2003

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A PROGRESSIVE REALTY'S OFFICE POLICY WHEN REPRESENTING BUYERS

Agency Relationships. Indiana law (I.C. 25-34.1-10-9.5) provides that a Licensee has an agency relationship with, and is representing, the individual with whom the Licensee is working unless (1) there is a written agreement to the contrary; or (2) the Licensee is merely assisting the individual as a customer. The Licensee (your broker or salesperson) at A Progressive Realty represents the interests of the Buyer as a Buyer's agent when showing another company's listing. Such Licensee owes duties of trust, loyalty, confidentiality, accounting and disclosure to the Buyer. However, Licensee must deal honestly with a seller. All representations made by Licensee are made as the agent of the Buyer.

Limited Agency Authorization. The Licensee or the principal or managing broker may personally represent a seller as a seller's agent in the case of a property listed with A Progressive Realty. If that occurs, then Licensee has agency duties to both Buyer and Seller which may be different or even adverse. If limited agency arises, Licensee **shall not disclose** the following without the informed consent, in writing, of both Buyer and Seller:

(a) Any material or confidential information, except adverse material facts or risks actually known by Licensee concerning the physical condition of the Property and facts required by statute, rule, or regulation to be disclosed and that could not be discovered by a reasonable and timely inspection of the Property by the parties.
(b) That a Buyer will pay more than the offered purchase price for the Property.
(c) That Seller will accept less than the listed price for the Property.
(d) Other terms that would create a contractual advantage for one party over another party.
(e) What motivates a party to buy or sell the Property.

In a limited agency situation, the parties agree that there will be no imputation of knowledge or information between any party and the limited agent or among Licensees.

By signing below, Buyer acknowledges that Limited Agency Authorization has been read and understood. Buyer understands that Buyer does not have to consent to Licensee(s) acting as limited agent(s), but gives informed consent voluntarily to limited agency and waives any claims, damages, losses, expenses, including attorneys' fees and costs, against Licensee(s) arising from Licensee's(s') role of limited agent(s).

× Ralph Levin
Buyer's Signature R11 LLC By Ralph Levin — Date

Buyer's Signature — Date

Steve Hosea
Licensee's Signature — Date 1/20/05

Exhibit "A"

The land referred to in this Commitment is located in the County of Elkhart, State of Indiana described as follows:

A part of the Southeast Quarter (SE ¼) of Section Seven (7) Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

Beginning in the center of the vacated alley, at a point eight and one-fourth (8 ¼) feet West of the Southwest corner of Lot Numbered Three Hundred sixty-two (362) in Ellistons Addition to the City of Elkhart; thence North along the centerline of said vacated alley, Two Hundred three (203) feet; thence East Eight and One-fourth (8 ¼) feet to the East line of the alley; thence North along the East line of said alley to the Northwest corner of Lot Numbered One Hundred Ten (110) in West Elkhart Addition; thence West Sixteen and one-half (16 ½) feet to the West line of the alley; thence North along the West line of said alley to the South line of Garfield Avenue; thence Northeasterly Sixty-three and ninety-eight hundredths (63.98) feet to the Southwest corner of Lot Numbered Three Hundred seventy-six (376) in the vacated Elliston Addition; thence Northeasterly on the Northern line of Garfield Avenue Fifty (50) feet to the Southwest corner of Lot Numbered Sixty-four (64) in West Elkhart Addition; thence Northwestwardly along the Westerly line of said Lot Sixty-four (64), One Hundred twenty-seven and ninety-five hundredths (127.95) feet to the Grounds of the Lake Shore and Michigan Southern Railway Company; thence Southwesterly along the Southerly line of said Railway Company ground Two Hundred seventy-two and three tenths (272.3) feet to an iron stake; thence South, parallel with Oakland Avenue, One Hundred fifty-five and eighty-five hundredths(155.85) feet; thence East thirty-three (33) feet; thence South parallel with Oakland Avenue, Two Hundred fifty-five and six tenths (255.6) feet; thence East, thirty-three (33) feet to the East line of Thirteenth Street; thence South on the East line of said Thirteenth Street, One Hundred twenty-two and twenty-five hundredths (122.25) feet to the northwest corner of Lot Numbered Three Hundred sixty (360) in Elliston Addition; thence East on the North line of said Lot Numbered Three Hundred sixty (360) and said North line extended to the point of beginning.

ALSO: Lots Numbered One Hundred Six (106), One Hundred seven (107), One Hundred eight (108), One Hundred nine (109), One Hundred ten (110), One Hundred eleven (111) and One Hundred twelve (112) as the said Lots are known and designated on the recorded Plat of ELLIS BROTHERS WEST ELKHART ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 60, page 208 in the Office of the Recorder of Elkhart County, Indiana.

Tax Key Numbers

20-06-07-430-001-000-012 – Elkhart City Concord Township (Sec 7-37-5)
20-06-07-430-007-000-012 - Elkhart City Concord Township (Lot 106)
20-06-07-430-008-000-012 - Elkhart City Concord Township (Lot 107)
20-06-07-430-009-000-012 - Elkhart City Concord Township (Lot 107)
20-06-07-430-010-000-012 - Elkhart City Concord Township (Pt Lot 108)
20-06-07-430-011-000-012 - Elkhart City Concord Township (Pt Lot 109 & 108)
20-06-07-430-012-000-012 - Elkhart City Concord Township (Pt Lots 110 & 111)
20-06-07-430-013-000-012 - Elkhart City Concord Township (Pt Lots 11 & 112)
20-06-07-430-014-000-012 - Elkhart City Concord Township (Pt Lot 112)

Addendum 1 to Commercial Real Estate Purchase Agreement
Between Rick Hollar and Nona Hollar ("Seller")and
R 11, L.L.C. or its assignee entity ("Buyer")

1. The Buyer's consummation of the transactions contemplated under the Commercial Real Estate Purchase Agreement dated January _____, 2005 is contingent upon Buyer obtaining financing on terms satisfactory to Buyer in Buyer's sole discretion.

2. Buyer's consummation of the transactions contemplated under the Commercial Real Estate Purchase Agreement dated January _____, 2005 is contingent upon the property zoned for Buyer's intended use.

Executed and delivered on January _____, 2005.

_____
Rick Hollar

_____
Nona Hollar

Seller

R 11, L.L.C. or its assignee entity

_____
By: Ralph Levin, Member

Buyer

DISCLOSURE

DULY ENTERED FOR TAXATION
SUBJECT TO FINAL ACCEPTANCE FOR TRANSFER
7-1 20 05
David L. Hess AUDITOR
003253
TRANSFER FEE 3.00 gd
PARCEL NO. ✓

ELKHART CNTY RECORDER
CHRISTOPHER J ANDERSON
FILED FOR RECORD
AS PRESENTED

2005 JUL -1 A 11:43

RETURN TO: **HOLD FOR MERIDIAN TITLE CORP.**
Mail Tax Notices To:
P.O. Box 579
70675 S. CENTERVILLE RD
Sturgis, MI 49091

Property Address:
1631 Oakland
Elkhart, IN

Tax ID No. 20-06-07-430-001-000-012
20-06-07-430-007-000-012
20-06-07-430-008-000-012
20-06-07-430-009-000-012
20-06-07-430-010-000-012
20-06-07-430-011-000-012
20-06-07-430-012-000-012
20-06-07-430-013-000-012
20-06-07-430-014-000-012

WARRANTY DEED

THIS INDENTURE WITNESSETH

Rick Hollar and Nona Hollar, Husband and Wife

CONVEY(S) AND WARRANT(S) TO

Sturgis Iron and Metal Co., Inc., a Michigan Corporation, for Ten Dollars and other valuable consideration the receipt whereof is hereby acknowledged, the following described REAL ESTATE in Elkhart County, in the State of Indiana, to wit:

A part of the Southeast Quarter (SE ¼) of Section Seven (7) Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

(1) 14.00 CK

Beginning in the center of the vacated alley, at a point eight and one-fourth (8 ¼) feet West of the Southwest corner of Lot Numbered Three Hundred sixty-two (362) in Elliston's Addition to the City of Elkhart; thence North along the centerline of said vacated alley, Two Hundred three (203) feet; thence East Eight and One-fourth (8 ¼) feet to the East line of the alley; thence North along the East line of said alley to the Northwest corner of Lot Numbered One Hundred Ten (110) in West Elkhart Addition; thence West Sixteen and one-half (16 ½) feet to the West line of the alley; thence North along the West line of said alley to the South line of Garfield Avenue; thence Northeasterly Sixty-three and ninety-eight hundredths (63.98) feet to the Southwest corner of Lot Numbered Three Hundred seventy-six (376) in the vacated Elliston's Addition; thence Northeasterly on the Northern line of Garfield Avenue Fifty (50) feet to the Southwest corner of Lot Numbered Sixty-four (64) in West Elkhart Addition; thence Northwestwardly along the Westerly line of said Lot Sixty-four (64), One Hundred twenty-seven and ninety-five hundredths (127.95) feet to the Grounds of the Lake Shore and Michigan Southern Railway Company; thence Southwesterly along the Southerly line of said Railway Company ground Two Hundred seventy-two and three tenths (272.3) feet to an iron stake; thence South, parallel with Oakland Avenue, One Hundred fifty-five and eighty-five hundredths(155.85) feet; thence East thirty-three (33) feet; thence South parallel with Oakland Avenue, Two Hundred fifty-five and six tenths (255.6) feet; thence East, Thirty-three (33) feet to the East line of Thirteenth Street; thence South on the East line of said Thirteenth Street, One Hundred twenty-two and twenty-five hundredths (122.25) feet to the northwest corner of Lot Numbered Three Hundred sixty (360) in Elliston's Addition; thence East on the North line of said Lot Numbered Three Hundred sixty (360) and said North line extended to the point of beginning.

ALSO: Lots Numbered One Hundred Six (106), One Hundred Seven (107), One Hundred Eight (108), One Hundred Nine (109), One Hundred Ten (110), One Hundred Eleven (111) and One Hundred Twelve (112) as the said Lots are known and designated on the recorded Plat of ELLIS BROTHERS WEST ELKHART ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 60, page 208 in the Office of the Recorder of Elkhart County, Indiana.

Property to be combined and Taxed as One Parcel

Subject to taxes for the year 2005, due and payable in 2006, and taxes for all subsequent years.

Subject to covenants, restrictions and easements of record including but not limited to Rights of public utility companies to continue to use the vacated streets and alleys.

IN WITNESS WHEREOF, the Grantor has executed this deed this 28TH day of June, 2005.

Rick Hollar

Nona Hollar

State of Indiana, County of Elkhart ss:

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared the within named Rick Hollar and Nona Hollar who acknowledged the execution of the foregoing Deed and who, having been duly sworn, stated that the representations therein contained are true.

WITNESS, my hand and Seal this 28TH day of June, 2005.

My Commission Expires: _____

Signature of Notary Public

Printed Name of Notary Public

Notary Public County and State of Residence

NOTARY PUBLIC SEAL INDIANA

JAMES HUGHEY
RES. OF ELKHART CO.
MY COMM. EXP. 6-13-08

This instrument was prepared by: Debra A. Guy, Attorney-at-Law #24473-71.
202 S. Michigan St., Ste. 1000, South Bend, IN 46601
C1223E05 skc

Please combine the following Tax Key Numbers as one Tax Parcel:

Tax ID No. 20-06-07-429-001-000-012
20-06-07-429-002-000-012
20-06-07-429-004-000-012
20-06-07-429-005-000-012

Tax ID No. 20-06-07-430-001-000-012
20-06-07-430-007-000-012
20-06-07-430-008-000-012
20-06-07-430-009-000-012
20-06-07-430-010-000-012
20-06-07-430-011-000-012
20-06-07-430-012-000-012
20-06-07-430-013-000-012
20-06-07-430-014-000-012

Signed this 28th day of June, 2005.

Sturgis Iron and Metal Co., Inc., a Michigan Corporation

By: Ralph Levin
Ralph Levin

State of Indiana, County of Elkhart ss:

Before me, the undersigned, a Notary Public in and for said County and State aforesaid, on this 28TH day of June, 2005, personally appeared Ralph Lavin, of Sturgis Iron and Metal Co., Inc., a Michigan Corporation who acknowledged the execution of the foregoing power of attorney to be a voluntary act and deed for the uses and purposes therein set forth.

WITNESS, my hand and Notary Seal.

MyCommission Expires:

Signature of Notary Public

Printed Name of Notary Public

Notary Public County and State of Residence

NOTARY PUBLIC SEAL INDIANA

JAMES HUGHEY
RES. OF ELKHART CO.
MY COMM. EXP. 6-13-08

Second Addendum to Real Estate Purchase Agreement
By and Between Rick Hollar and Nona Hollar ("Seller") and
R 11, L.L.C. or its assignee entity ("Purchaser") dated June 27,2005

Property: 1613 Oakland Avenue, Elkhart, Indiana

This Second Addendum is executed in consideration of the mutual promises contained herein and is an integral part of the Real Estate Purchase Agreement ("Purchase Agreement") between Seller and Purchaser to which it is attached and is hereby incorporated by reference into the Purchase Agreement. In the event of any conflict between the terms of the Purchase Agreement and this Addendum, the Addendum shall be controlling.

1. The first part of Paragraph E containing the hand written language prepared by the realtor for the Seller is deleted and the following substituted therefore:

At closing, the Purchaser shall have possession of the westerly and southwesterly portion of the Property including the existing smoke stacks. Seller shall vacate this agreed upon portion of the Property within two weeks from closing to allow Purchaser to demolish the buildings and improvements located on this portion of the Property. Seller shall possess the balance of the Property for a period up to and including 210 days from closing without rent payable by Seller to Purchaser. During the time from closing to vacating the Property, Seller shall be responsible for the payment of all utility charges including but not limited to gas, water, electrical and sewer at the Property. Notwithstanding this provision, the Seller shall use its best efforts to vacate the balance of the Property as soon as possible consistent with the continued operation of Seller's business. Seller has informed Purchaser that Seller has located a building to purchase and anticipates vacating the Property as quickly as possible

2. Paragraph F is deleted in its entirety and the following substituted therefore:

F. Closing. The closing on the sale shall take place at Meridian Title Company, Elkhart, Indiana on or before June 27, 2005 or at the end of the Due Diligence Period, whichever is later ("Closing Date") or this agreement shall terminate unless the Closing Date is extended in writing by Seller and Purchaser which agreement shall be signed without either Seller or Purchaser withholding consent.

3. Paragraph J (4) is amended by adding subparagraph 3 as follows:

Access to and Inspection of Property. Seller hereby consents to entry upon the Property by Purchaser and Purchaser's consultant for the purpose of conducting an additional Phase II environmental site assessment and asbestos abatement survey. Such inspection and testing shall be conducted in a reasonable manner and shall not interfere with the current operation of the Property. The inspection and testing shall be conducted at the sole cost and expense of the Purchaser. Purchaser hereby agrees that the results of any such testing and any reports or data generated in the course of conducting the environmental assessment and testing shall be deemed confidential and not disclosed to third parties, absent an order of administrative or judicial body

mandating such disclosure. The Purchaser agrees to pay the cost of all environmental assessments conducted for the Property.

4. On the Closing Date, the Seller and Purchaser agree to sign an environmental agreement releasing Seller from environmental liabilities other than those environmental liabilities caused by Seller during the time they owned the Property.

IN WITNESS WHEREOF, the undersigned have executed this Addendum as of the date set forth above.

Rick Hollar

Nona Hollar

Seller

R 11, L.L.C. or its assignee entity

By: Ralph Levin, Member

Purchaser

SALES DISCLOSURE FORM

State Form 46021 (R4/9-04)

Prescribed by Department of Local Government Finance
Pursuant to IC 6-1.1-5.5

PRIVACY NOTICE: The telephone numbers of the parties on this form are confidential according to IC 6-1.1-5.5-3(d)

PART 1 - To be completed by BUYER/GRANTEE and SELLER/GRANTOR (typed or printed in black ink)

PROPERTY TRANSFERRED

Parcel Number(s) (Show additional parcels on separate sheet if necessary.) | Acreage or Lot Size | Part of Parcel (split)

See Attached

Address: 1631 Oakland

# of Parcels: 9

City, Town, or Post Office: Elkhart | State: IN | ZIP Code

Tax Billing Address (if other than property address)

City, Town, or Post Office | State | ZIP Code

Legal Description

See Attached Legal Description
()

CONDITIONS

Identify all conditions/items that apply

NOTE: If items 12-21 apply, filers are not subject to disclosure filing fee.

- (●) 1-Buyer is an adjacent property owner
- ( ) 2-Vacant Land
- ( ) 3-Exchange for other real property ("Trade")
- ( ) 4-Seller Paid Points; amount if applicable
  $ [ ] , [ ] [ ] [ ] , [ ] [ ] [ ]
- ( ) 5-Change planned primary use of property? Describe in special circumstances
- ( ) 6-Existence of family or business relationship between buyer and seller
- ( ) 7-Land Contract Dated: _____
- ( ) 8-Personal property included in transfer, amount if applicable
  $ [ ] , [ ] [ ] [ ] , [ ] [ ] [ ]
- ( ) 9-Significant physical changes to property between March 1 and date of sale
- ( ) 10-Non-warranty deed; specify type _____
- ( ) 11-Partial Interest. Describe in special circumstances
- ( ) 12-Security interest documents such as mortgages or trust deeds.
- ( ) 13-Leases less than 90 years.
- ( ) 14-Document resulting from foreclosure, or express threat of foreclosure, divorce court order, condemnation,. probate or other judicial proceedings
- ( ) 15-Agreements and other documents for mergers, consolidations, and incorporations
- ( ) 16-Quitclaim deeds not serving as a source of title
- ( ) 17-Documents involving the partition of land between tenants in common, joint tenants, or tenants by the entirety.
- ( ) 18-Transfer to a charity, not for profit or government institution
- ( ) 19-Transfer for no or discounted consideration, or gift
- ( ) 20-Rerecording to correct prior recorded document
- ( ) 21-Easements, Right-of-way grants

ES DATA

Contract Date (MM/DD/YYYY): 06/28/2005 | Sales Price: $ [ ] , 400 , 000

Describe any unusual or special circumstances related to this sale, including the specification of any less-than-complete ownership interest and terms of seller financing.

Buildings to be demolished and combined as one Parcel

PART 1 - To be completed by BUYER/GRANTEE and SELLER/GRANTOR (typed or printed in black ink)

Seller(s)/Grantor(s)

Seller 1 - Name or Entity as appears on deed: Rick Hollar

Address: 19456 CR 104

City, Town, or Post Office: Bristol | State: IN | ZIP Code: 46507 -

Seller 2 - Name or Entity as appears on deed: Nona Hollar

Address: 19456 CR 104

City, Town, or Post Office: Bristol | State: IN | ZIP Code: 46507 -

Title Company Name (if applicable): Meridian Title Corporation | Title Company Phone: 800-777-1574

Buyer(s)/Grantee(s)

Buyer 1 - Name or Entity as appears on deed: Sturgis Iron and Metal Co., Inc.

Will this property be the buyer's primary residence? ◯ Yes ⊘ No

Address: 70675 S. CENTERVILLE RD

City, Town, or Post Office: Sturgis | State: MI | ZIP Code: 49091 -

Buyer 2 - Name or Entity as appears on deed:

Address:

City, Town, or Post Office: | State: | ZIP Code: -

Signatures

Under penalties of perjury, I hereby certify that this Sales Disclosure, to the best of my knowledge and belief, is true, correct and complete as required by law, and is prepared in accordance with IC 6-1.1-5.5, "Real Property Sales Disclosure Act".

Signature of Seller: [signature] | Seller Sign Date (MM/DD/YYYY): 06/28/2005 | Seller Phone: 574-293-9088

Signature of Buyer: Ralph Levin | Buyer Sign Date (MM/DD/YYYY): 06/28/2005 | Buyer Phone: 269-651-7851

PART 2 - COUNTY AUDITOR

AUDITOR'S FILE STAMP

Completion ◯ Yes ◯ No

Date Entered in Transfer Book: / /

PART 3 - COUNTY OR TOWNSHIP ASSESSOR

County Assessor or other assessing offical must verify and complete the following information:

◯ Significant physical changes to property between March 1 and date of sale

$, , AV LAND | Property class / use code

$, , AV IMPV | Taxing District (DLGF assigned)

$, , AV TOTAL ◯ Valid Sale

NEIGHBORHOOD CODE

INSTRUCTIONS

Indiana law requires a sales disclosure form to be completed when a conveyance document (see definition below) is filed with the county auditor. The county auditor may not accept a conveyance if (1) the sales disclosure form is not included with the conveyance document; or (2) the sales disclosure form is incomplete. A person filing a sales disclosure form shall pay a fee of ten dollars ($10.00) to the county auditor.

PART 1: BUYER AND SELLER INFORMATION

Property Transferred Information. Either the buyer/grantee or the seller/grantor should provide the parcel number(s) (including all dashes and decimals), full address, tax billing address, lot size, and legal description of the parcel(s) transferred. A legal description is especially important for metes and bounds descriptions and new parcels. If the transaction consists of more than three parcels, an additional list of parcel numbers and lot sizes must be attached to this document.

Sales conditions/items. The information in this section is used to determine sales characteristics, establish market value, determine applicability of the sale and for use in ratio or other studies. The appropriate circle or circles should be filled in for all conditions/items that apply to the sale. With regard to personal property (see definitions below), the buyer or seller must enter an estimated value of the personal property included in the sale. Similarly, the buyer and seller must enter the amount of seller paid points as applicable. Please note that while indicating that certain conditions/items will result in not paying a filing fee, the buyer/grantee or seller/grantor is still responsible for completing the form in full.

Sales Data. The date and sales price of the property transfer is to be printed in the spaces provided. Any unusual or special conditions of the sale that may affect the sales price or terms of the sales agreement should also be described.

Seller/Grantor Information. Seller(s)/grantor(s) are to provide the full name and address for seller(s) or entity as applicable. If there are more than two individuals or entities involved in the transaction, additional ownership information must be included in an attachment to this form. The seller/grantor must also provide, if applicable, the name and telephone number of the title company that handled the transaction.

Buyer/Grantee Information. Buyer(s)/grantee(s) are to provide the full name and address for buyer(s) or entity as applicable. If there are more than two individuals or entities involved in the transaction, additional ownership information must be included in an attachment to this form. The buyer/grantee must also indicate whether the property will be used as a residential primary residence.

Signature and Verification. The buyer/grantee, seller/grantor or their representatives must sign one (1) sales disclosure form, or if the parties do not agree on the information to be included on the completed form, each party must sign and file a separate form. If anyone other than the buyer/seller or an attorney of the buyer/seller is filling out the form, a properly executed Power of Attorney must be completed and attached. **A person who knowingly and intentionally falsifies or omits any information required on this form commits a Class A infraction.**

PART 2: COUNTY AUDITOR RESPONSIBILITY

The county auditor is responsible for collecting the filing fee as well as ensuring that all parties to the conveyance have completed and signed the form as required. The county auditor may not accept the sales disclosure statement if the statement is not signed by the buyer or seller. If the buyer or seller fails to completely fill out their designated portion of the form, the county auditor may not accept the conveyance document. The county auditor must also confirm the date the property was duly entered for transfer.

PART 3: COUNTY ASSESSOR INFORMATION

The county assessor is responsible for determining whether or not significant physical changes have been made to the property between March 1 and the date of sale. The county assessor is also responsible for entering property class or use codes, the proper department of local government finance taxing district number, the current assessed value, and neighborhood code information. The county assessor and/or other assessing officials are responsible for verifying the sale as well (note that verification is not required prior to submitting sales data to the DLGF). Sales disclosure forms provided in response to public records requests should not include phone numbers.

Definitions

Conveyance Document means any document, land sale contract, deed, quitclaim deed serving as a source of title, or other document presented for recording, that purports to transfer a real property interest for valuable consideration.

Personal property – items that are not attached (built-in or affixed) to the real estate (land and buildings). This might include items such as washers, dryers, window treatments, stoves and refrigerators. Other items considered personal property are boats and other vehicles, inventories (livestock, goods in process or for trade, or agricultural commodities) and machinery used in farming or manufacturing.

Tax ID No. 20-06-07-430-001-000-012
20-06-07-430-007-000-012
20-06-07-430-008-000-012
20-06-07-430-009-000-012
20-06-07-430-010-000-012
20-06-07-430-011-000-012
20-06-07-430-012-000-012
20-06-07-430-013-000-012
20-06-07-430-014-000-012

A part of the Southeast Quarter (SE ¼) of Section Seven (7) Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

Beginning in the center of the vacated alley, at a point eight and one-fourth (8 ¼) feet West of the Southwest corner of Lot Numbered Three Hundred sixty-two (362) in Elliston's Addition to the City of Elkhart; thence North along the centerline of said vacated alley, Two Hundred three (203) feet; thence East Eight and One-fourth (8 ¼) feet to the East line of the alley; thence North along the East line of said alley to the Northwest corner of Lot Numbered One Hundred Ten (110) in West Elkhart Addition; thence West Sixteen and one-half (16 ½) feet to the West line of the alley; thence North along the West line of said alley to the South line of Garfield Avenue; thence Northeasterly Sixty-three and ninety-eight hundredths (63.98) feet to the Southwest corner of Lot Numbered Three Hundred seventy-six (376) in the vacated Elliston's Addition; thence Northeasterly on the Northern line of Garfield Avenue Fifty (50) feet to the Southwest corner of Lot Numbered Sixty-four (64) in West Elkhart Addition; thence Northwestwardly along the Westerly line of said Lot Sixty-four (64), One Hundred twenty-seven and ninety-five hundredths (127.95) feet to the Grounds of the Lake Shore and Michigan Southern Railway Company; thence Southwesterly along the Southerly line of said Railway Company ground Two Hundred seventy-two and three tenths (272.3) feet to an iron stake; thence South, parallel with Oakland Avenue, One Hundred fifty-five and eighty-five hundredths(155.85) feet; thence East thirty-three (33) feet; thence South parallel with Oakland Avenue, Two Hundred fifty-five and six tenths (255.6) feet; thence East, Thirty-three (33) feet to the East line of Thirteenth Street; thence South on the East line of said Thirteenth Street, One Hundred twenty-two and twenty-five hundredths (122.25) feet to the northwest corner of Lot Numbered Three Hundred sixty (360) in Elliston's Addition; thence East on the North line of said Lot Numbered Three Hundred sixty (360) and said North line extended to the point of beginning.

ALSO: Lots Numbered One Hundred Six (106), One Hundred Seven (107), One Hundred Eight (108), One Hundred Nine (109), One Hundred Ten (110), One Hundred Eleven (111) and One Hundred Twelve (112) as the said Lots are known and designated on the recorded Plat of ELLIS BROTHERS WEST ELKHART ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 60, page 208 in the Office of the Recorder of Elkhart County, Indiana.

RETURN TO: **HOLD FOR MERIDIAN TITLE CORP.**
Mail Tax Notices To:
P.O. Box 579
70675 S. CENTERVILLE RD
Sturgis, MI 49091

Property Address:
1631 Oakland
Elkhart, IN

Tax ID No. 20-06-07-430-001-000-012
20-06-07-430-007-000-012
20-06-07-430-008-000-012
20-06-07-430-009-000-012
20-06-07-430-010-000-012
20-06-07-430-011-000-012
20-06-07-430-012-000-012
20-06-07-430-013-000-012
20-06-07-430-014-000-012

WARRANTY DEED

THIS INDENTURE WITNESSETH

Rick Hollar and Nona Hollar, Husband and Wife

CONVEY(S) AND WARRANT(S) TO

Sturgis Iron and Metal Co., Inc., a Michigan Corporation, for Ten Dollars and other valuable consideration the receipt whereof is hereby acknowledged, the following described REAL ESTATE in Elkhart County, in the State of Indiana, to wit:

A part of the Southeast Quarter (SE ¼) of Section Seven (7) Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

Beginning in the center of the vacated alley, at a point eight and one-fourth (8 ¼) feet West of the Southwest corner of Lot Numbered Three Hundred sixty-two (362) in Elliston's Addition to the City of Elkhart; thence North along the centerline of said vacated alley, Two Hundred three (203) feet; thence East Eight and One-fourth (8 ¼) feet to the East line of the alley; thence North along the East line of said alley to the Northwest corner of Lot Numbered One Hundred Ten (110) in West Elkhart Addition; thence West Sixteen and one-half (16 ½) feet to the West line of the alley; thence North along the West line of said alley to the South line of Garfield Avenue; thence Northeasterly Sixty-three and ninety-eight hundredths (63.98) feet to the Southwest corner of Lot Numbered Three Hundred seventy-six (376) in the vacated Elliston's Addition; thence Northeasterly on the Northern line of Garfield Avenue Fifty (50) feet to the Southwest corner of Lot Numbered Sixty-four (64) in West Elkhart Addition; thence Northwestwardly along the Westerly line of said Lot Sixty-four (64), One Hundred twenty-seven and ninety-five hundredths (127.95) feet to the Grounds of the Lake Shore and Michigan Southern Railway Company; thence Southwesterly along the Southerly line of said Railway Company ground Two Hundred seventy-two and three tenths (272.3) feet to an iron stake; thence South, parallel with Oakland Avenue, One Hundred fifty-five and eighty-five hundredths(155.85) feet; thence East thirty-three (33) feet; thence South parallel with Oakland Avenue, Two Hundred fifty-five and six tenths (255.6) feet; thence East, Thirty-three (33) feet to the East line of Thirteenth Street; thence South on the East line of said Thirteenth Street, One Hundred twenty-two and twenty-five hundredths (122.25) feet to the northwest corner of Lot Numbered Three Hundred sixty (360) in Elliston's Addition; thence East on the North line of said Lot Numbered Three Hundred sixty (360) and said North line extended to the point of beginning.

ALSO: Lots Numbered One Hundred Six (106), One Hundred Seven (107), One Hundred Eight (108), One Hundred Nine (109), One Hundred Ten (110), One Hundred Eleven (111) and One Hundred Twelve (112) as the said Lots are known and designated on the recorded Plat of ELLIS BROTHERS WEST ELKHART ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 60, page 208 in the Office of the Recorder of Elkhart County, Indiana.

Property to be combined and Taxed as One Parcel

Subject to taxes for the year 2005, due and payable in 2006, and taxes for all subsequent years.

Subject to covenants, restrictions and easements of record including but not limited to Rights of public utility companies to continue to use the vacated streets and alleys.

IN WITNESS WHEREOF, the Grantor has executed this deed this 28TH day of June, 2005.

Rick Hollar

Nona Hollar

State of Indiana, County of Elkhart ss:

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared the within named Rick Hollar and Nona Hollar who acknowledged the execution of the foregoing Deed and who, having been duly sworn, stated that the representations therein contained are true.

WITNESS, my hand and Seal this 28TH day of June, 2005.

My Commission Expires: _____

Signature of Notary Public

Printed Name of Notary Public

Notary Public County and State of Residence

NOTARY PUBLIC SEAL INDIANA

JAMES HUGHEY
RES. OF ELKHART CO.
MY COMM. EXP. 6-13-08

This instrument was prepared by: Debra A. Guy, Attorney-at-Law #24473-71.
202 S. Michigan St., Ste. 1000, South Bend, IN 46601
C1223E05 skc

LIMITED POWER OF ATTORNEY
FOR PREPARATION, COMPLETION AND SIGNATURE
OF THE INDIANA SALES DISCLOSURE FORM

' ' all men by these presents that the undersigned Buyer(s) and Seller(s) do hereby make, constitute and appoint Meridian Title C.. poration or its designated agent

to be my/our true and lawful attorney, for me/us and in my/our name, place and stead to do any and all of the following:

1. To prepare, complete and, if necessary, sign the Indiana Sales Disclosure Form for the property located at:
   1631 Oakland, Elkhart, IN

This power shall not be affected by my/our later disability or incompetence.

I/We give and grant to my/our said Attorney-in-Fact full power and authority to do and perform all and every act and thing requisite or proper to be done in the exercise of the rights and powers herein granted, as fully, to all intents and purposes, as I/we might or could do if personally present, with full power and substitution and revocation and with full authority to deal with the property as authorized above hereby ratifying and confirming all that my/our said Attorney-in-Fact, or his/her substitute, or substitutes, lawfully do or cause to be done by virtue of the authority granted herein.

Signed this 28TH day of June, 2005.

SELLER(S)

Rick Hollar

Nona Hollar

BUYER(S)

Sturgis Iron and Metal Co., Inc., a Michigan Corporation

By: Ralph Levin

Ralph Levin

State of Indiana, County of Elkhart ss:

Before me, the undersigned, a Notary Public in and for said County and State aforesaid, on this 28TH day of June, 2005, personally appeared Ralph Levin, Member of Sturgis Iron and Metal Co., Inc., a Michigan Corporation who acknowledged the execution of the foregoing power of attorney to be a voluntary act and deed for the uses and purposes therein set forth.

WITNESS, my hand and Notary Seal.

My Commission Expires: _____

Signature of Notary Public

Printed Name of Notary Public

Notary Public County and State of Residence

NOTARY PUBLIC SEAL INDIANA

JAMES HUGHEY
RES. OF ELKHART CO.
MY COMM. EXP. 6-13-08

State of Indiana, County of Elkhart ss:

Before me, the undersigned, a Notary Public in and for said County and State aforesaid, on this 28TH day of June, 2005, personally appeared Rick Hollar and Nona Hollar, Husband and Wife who acknowledged the execution of the foregoing power of attorney to be a voluntary act and deed for the uses and purposes therein set forth.

WITNESS, my hand and Notary Seal.

My Commission Expires: _____

Signature of Notary Public

Printed Name of Notary Public

Notary Public County and State of Residence

NOTARY PUBLIC SEAL INDIANA

JAMES HUGHEY
RES. OF ELKHART CO.
MY COMM. EXP. 6-13-08

[redacted] instrument was prepared by: Debra A. Guy, Attorney-at-Law #24473-71.
202 S. Michigan St., Ste. 1000, South Bend, IN 46601
C1223E05

RETURN TO: **HOLD FOR MERIDIAN TITLE CORP.**
Mail Tax Notices To:

Property Address:
1631 Oakland
Elkhart, IN

Tax ID No.

20-06-07-430-014-000-012
20-06-07-430-013-000-012
20-06-07-430-012-000-012
20-06-07-430-011-000-012
20-06-07-430-010-000-012
20-06-07-430-001-000-012
20-06-07-430-007-000-012
20-06-07-430-008-000-012
20-06-07-430-009-000-012

WARRANTY DEED

THIS INDENTURE WITNESSETH

Rick Hollar and Nona Hollar, Husband and Wife

CONVEY(S) AND WARRANT(S) TO

Sturgis Iron and Metal Co., Inc., a Michigan Corporation, for Ten Dollars and other valuable consideration the receipt whereof is hereby acknowledged, the following described REAL ESTATE in Elkhart County, in the State of Indiana, to wit:

A part of the Southeast Quarter (SE ¼) of Section Seven (7) Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:
Beginning in the center of the vacated alley, at a point eight and one-fourth (8 ¼) feet West of the Southwest corner of Lot Numbered Three Hundred sixty-two (362) in Elliston's Addition to the City of Elkhart; thence North along the centerline of said vacated alley, Two Hundred three (203) feet; thence East Eight and One-fourth (8 ¼) feet to the East line of the alley; thence North along the East line of said alley to the Northwest corner of Lot Numbered One Hundred Ten (110) in West Elkhart Addition; thence West Sixteen and one-half (16 ½) feet to the West line of the alley; thence North along the West line of said alley to the South line of Garfield Avenue; thence Northeasterly Sixty-three and ninety-eight hundredths (63.98) feet to the Southwest corner of Lot Numbered Three Hundred seventy-six (376) in the vacated Elliston's Addition; thence Northeasterly on the Northern line of Garfield Avenue Fifty (50) feet to the Southwest corner of Lot Numbered Sixty-four (64) in West Elkhart Addition; thence Northwestwardly along the Westerly line of said Lot Sixty-four (64), One Hundred twenty-seven and ninety-five hundredths (127.95) feet to the Grounds of the Lake Shore and Michigan Southern Railway Company; thence Southwesterly along the Southerly line of said Railway Company ground Two Hundred seventy-two and three tenths (272.3) feet to an iron stake; thence South, parallel with Oakland Avenue, One Hundred fifty-five and eighty-five hundredths(155.85) feet; thence East thirty-three (33) feet; thence South parallel with Oakland Avenue, Two Hundred fifty-five and six tenths (255.6) feet; thence East, Thirty-three (33) feet to the East line of Thirteenth Street; thence South on the East line of said Thirteenth Street, One Hundred twenty-two and twenty-five hundredths (122.25) feet to the northwest corner of Lot Numbered Three Hundred sixty (360) in Elliston's Addition; thence East on the North line of said Lot Numbered Three Hundred sixty (360) and said North line extended to the point of beginning.

ALSO: Lots Numbered One Hundred Six (106), One Hundred Seven (107), One Hundred Eight (108), One Hundred Nine (109), One Hundred Ten (110), One Hundred Eleven (111) and One Hundred Twelve (112) as the said Lots are known and designated on the recorded Plat of ELLIS BROTHERS WEST ELKHART ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 60, page 208 in the Office of the Recorder of Elkhart County, Indiana.

Subject to taxes for the year 2005, due and payable in 2006, and taxes for all subsequent years.
Subject to covenants, restrictions and easements of record.

IN WITNESS WHEREOF, the Grantor has executed this deed this ___ day of _____, 2005.

_____ _____
Rick Hollar Nona Hollar

State of Indiana, County of Elkhart ss:

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared the within named Rick Hollar and Nona Hollar who acknowledged the execution of the foregoing Deed and who, having been duly sworn, stated that the representations therein contained are true.

WITNESS, my hand and Seal this _____ day of _____, 2005.

My Commission Expires: _____ _____
Signature of Notary Public

_____
Printed Name of Notary Public

_____
Notary Public County and State of Residence

This instrument was prepared by: Debra A. Guy, Attorney-at-Law #24473-71.
202 S. Michigan St., Ste. 1000, South Bend, IN 46601
C1223E05 skc

MERIDIAN
ITLE CORPORATION

Corporate Office
202 S. Michigan St., Ste. 1000
South Bend, IN 46601
574 232-5845 FAX 289-1514

Elkhart Office
405 S. Second St., Ste. 100
Elkhart, IN 46516
574 293-3075 FAX 674-0070

BUYER(S) AND SELLER(S) CLOSING STATEMENT

MTC File No: C1223E05
Customer Reference:
Buyer(s): Sturgis Iron and Metal Co., Inc., a Michigan corporation
Seller(s): Meridian Title Corporation, as QI for Rick & Nona Hollar
Date: 6/28/2005

	BUYER(S)	SELLER(S)
PURCHASE PRICE:	$400,000.00	$400,000.00
CHARGES:		
Total sales/broker commission		$20,000.00
Appraisal fee		
Title insurance Owners (MTC)		$1,100.00
Lenders (MTC)		
Settlement or closing fee	$200.00	$200.00
Recording/Filing Service Fee	$85.00	
Document preparation		$50.00
Express Mail Service Fee	$40.00	
Attorney's fees to		
Processing Fee		
Administrative Fee		
Survey Paid Outside Closing by Buyer		
Environmental Cleanup POC by Buyer		
1031 Exchange Fee		$500.00
Excess deposit (see instructions)		
Payoff of first mortgage loan KeyBank		$16,042.52
Payoff of second mortgage loan		
Real Estate Tax Proration		$4,133.36
1/1/2005 to 6/28/2005		
178 days @ $ 23.22 per diem		
Real Estate Taxes		$4,237.85
Spring / Fall Installment		
TOTAL CHARGES:	$400,325.00	$46,313.73
CREDITS:		
Real Estate Tax Proration	$4,133.36	
1/1/2005 to 6/28/2005		
178 days @ $ 23.22 per diem		
Real Estate Taxes		
Spring /Fall Installment		
Deposit or earnest money	$10,000.00	
Principal amount of new loan(s)		
TOTAL CREDITS:	$14,133.36	$400,000.00
NET DUE (FROM BUYER - TO SELLER):	$386,191.64	$353,686.27

Sturgis Iron and Metal Co., Inc.

By: Ralph Lewin

Meridian Title Corporation, as Qualified Intermidiary

Approved by Rick Hollar

Approved by Nona Hollar

VENDOR'S AFFIDAVIT

Rick Hollar and Nona Hollar, Husband and wife (hereinafter referred to, jointly and severally as "Vendor") being first duly sworn state(s) that conveyance is being made, this day, to Sturgis Iron and Metal Co., Inc., a Michigan Corporation (hereinafter referred to, jointly and severally, as "Purchaser"), by Warranty Deed, the following described Real Estate located in Elkhart County, Indiana:

A part of the Southeast Quarter (SE ¼) of Section Seven (7) Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

Beginning in the center of the vacated alley, at a point eight and one-fourth (8 ¼) feet West of the Southwest corner of Lot Numbered Three Hundred sixty-two (362) in Elliston's Addition to the City of Elkhart; thence North along the centerline of said vacated alley, Two Hundred three (203) feet; thence East Eight and One-fourth (8 ¼) feet to the East line of the alley; thence North along the East line of said alley to the Northwest corner of Lot Numbered One Hundred Ten (110) in West Elkhart Addition; thence West Sixteen and one-half (16 ½) feet to the West line of the alley; thence North along the West line of said alley to the South line of Garfield Avenue; thence Northeasterly Sixty-three and ninety-eight hundredths (63.98) feet to the Southwest corner of Lot Numbered Three Hundred seventy-six (376) in the vacated Elliston Addition; thence Northeasterly on the Northern line of Garfield Avenue Fifty (50) feet to the Southwest corner of Lot Numbered Sixty-four (64) in West Elkhart Addition; thence Northwestwardly along the Westerly line of said Lot Sixty-four (64), One Hundred twenty-seven and ninety-five hundredths (127.95) feet to the Grounds of the Lake Shore and Michigan Southern Railway Company; thence Southwesterly along the Southerly line of said Railway Company ground Two Hundred seventy-two and three tenths (272.3) feet to an iron stake; thence South, parallel with Oakland Avenue, One Hundred fifty-five and eighty-five hundredths(155.85) feet; thence East thirty-three (33) feet; thence South parallel with Oakland Avenue, Two Hundred fifty-five and six tenths (255.6) feet; thence East, Thirty-three (33) feet to the East line of Thirteenth Street; thence South on the East line of said Thirteenth Street, One Hundred twenty-two and twenty-five hundredths (122.25) feet to the northwest corner of Lot Numbered Three Hundred sixty (360) in Elliston Addition; thence East on the North line of said Lot Numbered Three Hundred sixty (360) and said North line extended to the point of beginning.

ALSO: Lots Numbered One Hundred Six (106), One Hundred Seven (107), One Hundred Eight (108), One Hundred Nine (109), One Hundred Ten (110), One Hundred Eleven (111) and One Hundred Twelve (112) as the said Lots are known and designated on the recorded Plat of ELLIS BROTHERS WEST ELKHART ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 60, page 208 in the Office of the Recorder of Elkhart County, Indiana.

and commonly known as 1631 Oakland, Elkhart, Indiana (street address) (hereinafter referred to as "Real Estate").

In connection with the sale of the Real Estate, Vendor has furnished Purchaser with a commitment for an owner's policy of title insurance for the Real Estate under date of June 2, 2005 at 8:00 AM issued by Meridian Title Corporation as File No. C1223E05.

Vendor has an indefeasible estate in fee simple in the Real Estate and the Real Estate is free and clear of every kind or description of lien, lease or encumbrance EXCEPT the following:

1. Current real estate taxes, not delinquent.

2. Such other matters affecting the Real Estate, if any, as are disclosed in the above commitment for title insurance.

Vendor has not executed, or permitted anyone on Vendor's behalf to execute, any conveyance, mortgage, lien, lease, security agreement, financing statement or encumbrance of or upon the Real Estate or any fixtures attached thereto, except as stated above, which is now outstanding or enforceable against the Real Estate. Vendor has made no contract to sell all or a part of the Real Estate to any person other than the Purchaser, and Vendor has not given to any person an option or right of first refusal to purchase all or any part of the Real Estate, which is enforceable or exercisable now or at any time in the future. There are no unpaid claims for labor done upon or materials or equipment furnished for the Real estate in respect of which liens have been or may be filed, and to the best knowledge and belief of Affiant, the

improvements upon the Real Estate are all located entirely within the bounds of the Real Estate, and there are no encroachments thereon. There are no existing violations of zoning ordinances or other restrictions applicable to the Real Estate known to Affiant.

There is no judgment of any court of the State of Indiana or of any Court of the United States that is or may become a lien on the Real Estate. No petition for bankruptcy has been filed by or against Vendor within the last six months, nor is any petition now pending with respect to Vendor for bankruptcy, insolvency or incompetency. Vendor is neither principal nor surety on any bond payable to the State of Indiana.

The Real Estate is now occupied by and in possession of Rick Hollar and Nona Hollar, Husband and wife as Fee Simple and no other person has a right to possession or claims possession of all or any part of the Real Estate.

Vendor will deliver possession of Real Estate to Purchaser on or before **DATE OF CLOSING**, free and clear of any right or claim of any person to the possession of the Real Estate except:

Vendor has 210 days to vacate and remove equipment from the premises.

Vendor is not acting, directly or indirectly, in any capacity whatsoever for any foreign country or nation thereof, and Vendor is more than eighteen (18) years of age and a citizen of the United States.

Vendor has not received any bill, invoice or statement for special assessment of the Real Estate for public improvements thereto, nor any bill, invoice or statement for any special tax levy, and that neither the Vendor, nor affiant(s) (if different than Vendor) have received any notice or have any knowledge of any pending proceedings for the special assessment or special taxation of the Real Estate.

Vendor intends that each of the statements made herein shall be construed as a representation; each of the representations is made for the purpose of inducing Purchaser to purchase the Real Estate; and each of the representations, whether construed jointly or severally, is true. Vendor expressly authorizes Purchaser and the Title Insurance Company, and all other persons to rely on such representations.

Rick Hollar

Nona Hollar

State of Indiana, County of Elkhart ss:

Subscribed and sworn to before me, a Notary Public in and for said County and State, this 28TH day of June, 2005.

My Commission Expires: _____

Signature of Notary Public

Printed Name of Notary Public

Notary Public County and State of Residence

NOTARY PUBLIC SEAL INDIANA

JAMES HUGHEY
RES. OF ELKHART CO.
MY COMM. EXP. 6-13-08

This instrument was prepared by: Debra A. Guy, Attorney-at-Law #24473-71.
202 S. Michigan St., Ste. 1000, South Bend, IN 46601
C1223E05 jdh

SALES DISCLOSURE FORM

State Form 46021 (R4/9-04)

Prescribed by Department of Local Government Finance
Pursuant to IC 6-1.1-5.5

PRIVACY NOTICE: The telephone numbers of the parties on this form are confidential according to IC 6-1.1-5.5-3(d)

PART 1 - To be completed by BUYER/GRANTEE and SELLER/GRANTOR (typed or printed in black ink)

PROPERTY TRANSFERRED

Parcel Number(s) (Show additional parcels on separate sheet if necessary.) | Acreage or Lot Size | Part of Parcel (split)

See Attached

Address | # of Parcels

City, Town, or Post Office | State | ZIP Code

Tax Billing Address (if other than property address)

P.O. Box 579 70675 S. Centerville Rd

City, Town, or Post Office | State | ZIP Code

Sturgis MI 49091

Legal Description

See Attached

CONDITIONS

Identify all conditions/items that apply

NOTE: If items 12-21 apply, filers are not subject to disclosure filing fee.

- ● 1-Buyer is an adjacent property owner
- ● 2-Vacant Land
- ○ 3-Exchange for other real property ("Trade")
- ○ 4-Seller Paid Points; amount if applicable
  $, ,
- ○ 5-Change planned primary use of property? Describe in special circumstances
- ○ 6-Existence of family or business relationship between buyer and seller
- ○ 7-Land Contract Dated: _____
- ○ 8-Personal property included in transfer, amount if applicable
  $, ,
- ○ 9-Significant physical changes to property between March 1 and date of sale
- ○ 10-Non-warranty deed; specify type _____
- ○ 11-Partial Interest. Describe in special circumstances
- ○ 12-Security interest documents such as mortgages or trust deeds.
- ○ 13-Leases less than 90 years.
- ○ 14-Document resulting from foreclosure, or express threat of foreclosure, divorce court order, condemnation, probate or other judicial proceedings
- ○ 15-Agreements and other documents for mergers, consolidations, and incorporations
- ○ 16-Quitclaim deeds not serving as a source of title
- ○ 17-Documents involving the partition of land between tenants in common, joint tenants, or tenants by the entirety.
- ○ 18-Transfer to a charity, not for profit or government institution
- ● 19-Transfer for no or discounted consideration, or gift
- ○ 20-Rerecording to correct prior recorded document
- ○ 21-Easements, Right-of-way grants

S DATA

Contract Date (MM/DD/YYYY) 06/28/2005 | Sales Price $ .00

Describe any unusual or special circumstances related to this sale, including the specification of any less-than-complete ownership interest and terms of seller financing.

To be combined as one Parcel & with deed from Rick & Wona Hollar

PART 1 - To be completed by BUYER/GRANTEE and SELLER/GRANTOR (typed or printed in black ink)

Seller(s)/Grantor(s)

Seller 1 - Name or Entity as appears on deed

R II, L.L.C.

Address

70675 S. Centerville Rd

City, Town, or Post Office | State | ZIP Code

Sturgis | MI | 49091-

Seller 2 - Name or Entity as appears on deed

Address

City, Town, or Post Office | State | ZIP Code

Title Company Name (If applicable) | Title Company Phone

Meridian Title Corp | 800-777-1574

Buyer(s)/Grantee(s)

Buyer 1 - Name or Entity as appears on deed

Sturgis Iron and Metal Co., Inc.

Will this property be the buyer's primary residence? ○ Yes ● No

Address

70675 S. Centerville Rd

City, Town, or Post Office | State | ZIP Code

Sturgis | MI | 49091-

Buyer 2 - Name or Entity as appears on deed

Address

City, Town, or Post Office | State | ZIP Code

Signatures

Under penalties of perjury, I hereby certify that this Sales Disclosure, to the best of my knowledge and belief, is true, correct and complete as required by law, and is prepared in accordance with IC 6-1.1-5.5, "Real Property Sales Disclosure Act".

Signature of Seller: Ralph Lewin

Seller Sign Date (MM/DD/YYYY): 06/28/2005

Seller Phone: 269-651-7851

Signature of Buyer: Ralph Lewin

Buyer Sign Date (MM/DD/YYYY): 06/28/2005

Buyer Phone: 269-651-7851

PART 2 - COUNTY AUDITOR

AUDITOR'S FILE STAMP

Completion ○ Yes ○ No

Date Entered in Transfer Book

/ /

PART 3 - COUNTY OR TOWNSHIP ASSESSOR

County Assessor or other assessing offical must verify and complete the following information:

○ Significant physical changes to property between March 1 and date of sale

$, , AV LAND

Property class / use code

Taxing District (DLGF assigned)

$, , AV IMPV

$, , AV TOTAL

○ Valid Sale

NEIGHBORHOOD CODE

INSTRUCTIONS

Indiana law requires a sales disclosure form to be completed when a conveyance document (see definition below) is filed with the county auditor. The county auditor may not accept a conveyance if (1) the sales disclosure form is not included with the conveyance document; or (2) the sales disclosure form is incomplete. A person filing a sales disclosure form shall pay a fee of ten dollars ($10.00) to the county auditor.

PART 1: BUYER AND SELLER INFORMATION

Property Transferred Information. Either the buyer/grantee or the seller/grantor should provide the parcel number(s) (including all dashes and decimals), full address, tax billing address, lot size, and legal description of the parcel(s) transferred. A legal description is especially important for metes and bounds descriptions and new parcels. If the transaction consists of more than three parcels, an additional list of parcel numbers and lot sizes must be attached to this document.

Sales conditions/items. The information in this section is used to determine sales characteristics, establish market value, determine applicability of the sale and for use in ratio or other studies. The appropriate circle or circles should be filled in for all conditions/items that apply to the sale. With regard to personal property (see definitions below), the buyer or seller must enter an estimated value of the personal property included in the sale. Similarly, the buyer and seller must enter the amount of seller paid points as applicable. Please note that while indicating that certain conditions/items will result in not paying a filing fee, the buyer/grantee or seller/grantor is still responsible for completing the form in full.

Sales Data. The date and sales price of the property transfer is to be printed in the spaces provided. Any unusual or special conditions of the sale that may affect the sales price or terms of the sales agreement should also be described.

Seller/Grantor Information. Seller(s)/grantor(s) are to provide the full name and address for seller(s) or entity as applicable. If there are more than two individuals or entities involved in the transaction, additional ownership information must be included in an attachment to this form. The seller/grantor must also provide, if applicable, the name and telephone number of the title company that handled the transaction.

Buyer/Grantee Information. Buyer(s)/grantee(s) are to provide the full name and address for buyer(s) or entity as applicable. If there are more than two individuals or entities involved in the transaction, additional ownership information must be included in an attachment to this form. The buyer/grantee must also indicate whether the property will be used as a residential primary residence.

Signature and Verification. The buyer/grantee, seller/grantor or their representatives must sign one (1) sales disclosure form, or if the parties do not agree on the information to be included on the completed form, each party must sign and file a separate form. If anyone other than the buyer/seller or an attorney of the buyer/seller is filling out the form, a properly executed Power of Attorney must be completed and attached. **A person who knowingly and intentionally falsifies or omits any information required on this form commits a Class A infraction.**

PART 2: COUNTY AUDITOR RESPONSIBILITY

The county auditor is responsible for collecting the filing fee as well as ensuring that all parties to the conveyance have completed and signed the form as required. The county auditor may not accept the sales disclosure statement if the statement is not signed by the buyer or seller. If the buyer or seller fails to completely fill out their designated portion of the form, the county auditor may not accept the conveyance document. The county auditor must also confirm the date the property was duly entered for transfer.

PART 3: COUNTY ASSESSOR INFORMATION

The county assessor is responsible for determining whether or not significant physical changes have been made to the property between March 1 and the date of sale. The county assessor is also responsible for entering property class or use codes, the proper department of local government finance taxing district number, the current assessed value, and neighborhood code information. The county assessor and/or other assessing officials are responsible for verifying the sale as well (note that verification is not required prior to submitting sales data to the DLGF). Sales disclosure forms provided in response to public records requests should not include phone numbers.

Definitions

Conveyance Document means any document, land sale contract, deed, quitclaim deed serving as a source of title, or other document presented for recording, that purports to transfer a real property interest for valuable consideration.

Personal property – items that are not attached (built-in or affixed) to the real estate (land and buildings). This might include items such as washers, dryers, window treatments, stoves and refrigerators. Other items considered personal property are boats and other vehicles, inventories (livestock, goods in process or for trade, or agricultural commodities) and machinery used in farming or manufacturing.

Tax ID No. 20-06-07-429-001-000-012
20-06-07-429-002-000-012
20-06-07-429-004-000-012
20-06-07-429-005-000-012

TRACT I

A portion of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East in the City of Elkhart, Elkhart County, State of Indiana, more particularly described as follows:

Commencing at the intersection of the West line of 13th Street and the South property line of the New York Central Railroad as conveyed to its predecessor, The Lake Shore & Michigan Southern Railway Company by Quit-Claim Deed dated February 16, 1909 and recorded in the Office of the Recorder of Elkhart County on May 1, 1909 in Book 117, page 506, said point being Seventy (70) feet directly South from the Southeast corner of the property formerly owned by the Elkhart Frog & Crossing Company; thence North a distance of Seventy (70) feet to the said Southeast corner; thence West along the South line of the property formerly owned by the said Elkhart Frog and Crossing Company and along the North line of the above conveyance, a distance of Six hundred (600) feet, more or less, to a point Twelve (12) feet Southeasterly by radial measurement from the centerline of the most Easterly track of the Grantor; thence Southerly along a curved line concentric with the centerline of said track, a distance of Two hundred seventy-five (275) feet, more or less, to a point in the South line of the property covered by the above conveyance; thence Northeasterly along said property line, a distance of Seven hundred fifteen (715) feet, more or less, to the point of beginning.

TRACT II

A part of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

Commencing at the Northeast corner of Fourteenth Street as marked on the recorded Plat of Elliston's Addition; thence North Eighty (80) feet; thence West Thirty-three (33) feet; thence South Eighty (80) feet; thence East Thirty-three (33) feet to the place of beginning.

ALSO: A part of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, situated in the City of Elkhart, State of Indiana, bounded and described as follows:

Commencing at the intersection of the West line of Fourteenth Street and the North line of Wolf Avenue, as the said are platted in the City of Elkhart, Indiana; thence South along the West line of Fourteenth Street, Four and thirty-nine hundredths (4.39) feet to an iron stake; thence North Eighty-nine (89) degrees Forty-four (44) minutes West, Ninety-six and seventy-eight hundredths (96.78) feet to an iron stake; thence North Zero (0) degrees Sixteen (16) minutes East, Forty-five and seventy-three hundredths (45.73) feet to an iron stake on the North line of the former Sidway property for the beginning point of this description; thence South Zero (0) degrees Sixteen (16) minutes West, Forty-five and seventy-three hundredths (45.73) feet to an iron stake; thence South Eighty-nine (89) degrees Forty-four (44) minutes East, Ninety-six and seventy-eight hundredths (96.78) feet to an iron stake on the West line of Fourteenth Street; thence North along the West line of Fourteenth Street, Four and thirty-nine hundredths (4.39) feet to the North line of Wolf Avenue; thence South Eighty-nine (89) degrees Fifty-nine (59) minutes East, Seventeen (17) feet to an iron stake; thence North Sixty-two and forty-five hundredths (62.45) feet to an iron stake; thence North Eighty-nine (89) degrees Fifty-nine (59) minutes West, Thirty-three (33) feet; thence North Two and five hundredths (2.05) feet; thence South Seventy-four (74) degrees Twenty-seven (27) minutes West along the North line of the former Sidway Property to the place of beginning.

TRACT III

A part of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

Commencing at a point which is Seventeen hundred fifty-five (1755) feet North and Four hundred thirty-five (435) feet West of the Southeast corner of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, which point is the Northeast corner of a certain parcel of land now owned by the New York Central Railroad Company; thence West Five hundred eighty-four and five tenths (584.5) feet; thence in a Northeastwardly direction at an angle of Forty-seven (47) degrees measured from East to Northeast from said South line, a distance of One hundred Forty-four (144) feet to a point; thence Northeastwardly in a straight line Two hundred (200) feet, more or less, to a point on the South line of the right-of-way of Lake Shore and Michigan Southern Railway (now New York Central Railroad Company) which point is Four hundred eighty-five (485) feet distant Northeastwardly from a point which is Seven hundred forty-nine and five tenths (749.5) feet Westwardly from the beginning point of this description, measured along the first above described line produced Westwardly; thence Northeastwardly along the South line of said right of way to a point, which if Four hundred thirty-five (435) feet due North of the place of beginning; thence South Four hundred thirty-five (435) feet to the place of beginning.

RETURN TO: **HOLD FOR MERIDIAN TITLE CORP.**

Property Address:
1703 Thirteenth 1727 Fourteenth
Elkhart, IN 46516

Tax ID No. 20-06-07-429-001-000-012
20-06-07-429-002-000-012
20-06-07-429-004-000-012
20-06-07-429-005-000-012

Mail Tax Statements To:
P.O. Box 579
70675 S. CENTERVILLE RD
Sturgis, MI 49091

QUIT CLAIM DEED

THIS INDENTURE WITNESSETH

R 11, L.L.C., a Michigan limited liability company

RELEASE AND QUIT CLAIM

To Sturgis Iron and Metal Co., Inc., a Michigan Corporation for Ten Dollars and other valuable consideration the receipt whereof is hereby acknowledged, the following described REAL ESTATE in Elkhart, in the State of Indiana, to wit:

SEE ATTACHED LEGAL DESCRIPTION

Subject to taxes for the year 2005, due and payable in 2006, and taxes for all subsequent years.

Subject to covenants, restrictions and easements of record.

The undersigned persons executing this deed on behalf of Grantor represent and certify that they are a current member/manager of said Limited Liability Company and have been fully empowered by a proper meeting and vote of Grantor's members to execute and deliver this deed.

IN WITNESS WHEREOF, The Grantor has executed this deed this 28TH day of June, 2005.

R 11, L.L.C., a Michigan limited liability company

By: Ralph Levin
Ralph Levin, Member

State of Indiana, County of Elkhart ss:

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared the within named Ralph Levin who acknowledged the execution of the foregoing Deed and who, having been duly sworn, stated that the representations therein contained are true.

WITNESS, my hand and Seal this 28TH day of June, 2005.

My Commission Expires: _____

Signature of Notary Public

Printed Name of Notary Public

Notary Public County and State of Residence

NOTARY PUBLIC SEAL INDIANA

JAMES HUGHEY
RES. OF ELKHART CO.
MY COMM. EXP. 6-13-08

instrument was prepared by: Debra A. Guy, Attorney-at-Law #24473-71.
202 S. Michigan St., Ste. 1000, South Bend, IN 46601
C1223E05 jdh

LEGAL DESCRIPTION

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TRACT II

A part of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

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RELEASE OF MORTGAGE

THIS CERTIFIES that a mortgage executed by Rick Hollar and Nona Hollar, husband and wife to KeyBank National Association on the 2nd day of January, 2004, securing $156,228.60 and recorded January 9, 2004 as Document Number 2004-00863 in the Office of the Recorder of Elkhart County, State of Indiana, has been released and discharged, that Lake City Bank is the holder of the Note/Mortgage, and that the lien of the Mortgage is hereby released.

Such release of said Mortgage in no way effects a discharge of the underlying debt, and shall not prejudice any existing or future rights, remedies, benefits or powers belonging or accruing to payee under the Note. The Terms of said Note shall remain in full force and effect.

IN WITNESS WHEREOF KeyBank National Association, Mortgagee(s) aforesaid, has hereunto executed this Release of Mortgage this 27th day of June, 2005.

KeyBank National Association

By: Robert J. Mater

S of Indiana, County of Elkhart ss:

Before me, a Notary Public in and for said County and State, personally appeared Robert J. Mater of KeyBank National Association, who acknowledged the execution of the foregoing Release of Mortgage, and who, having been duly sworn, stated that the representations therein contained are true.

WITNESS my hand and Notarial Seal this 27th day of June, 2005.

My Commission Expires: Feb 1, 2010

Michael B. Makowski
Signature of Notary Public

Michael B. Makowski
Printed Name of Notary Public

St. Joseph Co. / Indiana
Notary Public County and State of Residence

This instrument was prepared by: Debra A. Guy, Attorney-at-Law #24473-71.
202 S. Michigan St., Ste. 1000, South Bend, IN 46601
C1223E05 jdh

RELEASE OF MORTGAGE

THIS CERTIFIES that a mortgage executed by Rick Hollar and Nona Hollar, husband and wife to KeyBank National Association on the 2nd day of January, 2004, securing $52,141.90 and recorded January 8, 2004 as Document Number 2004-00800 in the Office of the Recorder of Elkhart County, State of Indiana, has been fully paid and satisfied, and the same hereby released.

IN WITNESS WHEREOF KeyBank National Association, Mortgagee(s) aforesaid, has hereunto executed this Release of Mortgage this 27th day of June, 2005.

KeyBank National Association

By: Robert J. Mater

State of INDIANA, County of ELKHART ss:

Before me, a Notary Public in and for said County and State, personally appeared ROBERT J. MATER of K Bank National Association, who acknowledged the execution of the foregoing Release of Mortgage, and who, having b duly sworn, stated that the representations therein contained are true.

WITNESS my hand and Notarial Seal this 27th day of June, 2005.

Michael B. Makowski
Signature of Notary Public

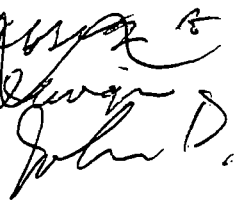
My Commission Expires: FEB 1, 2010

MICHAEL B. MAKOWSKI
Printed Name of Notary Public

ST. JOSEPH CO. / INDIANA
Notary Public County and State of Residence

This instrument was prepared by: Debra A. Guy, Attorney-at-Law #24473-71.
202 S. Michigan St., Ste. 1000, South Bend, IN 46601
C1223E05 jdh

Second Addendum to Real Estate Purchase Ag
By and Between Rick Hollar and Nona Hollar ("S
R 11, L.L.C. or its assignee entity ("Purchaser") dated



Property: 1613 Oakland Avenue, Elkhart, Indiana

This Second Addendum is executed in consideration of the mutual [illegible]
and is an integral part of the Real Estate Purchase Agreement ("Purchase Agreement") between Seller and Purchaser to which it is attached and is hereby incorporated by reference into the Purchase Agreement. In the event of any conflict between the terms of the Purchase Agreement and this Addendum, the Addendum shall be controlling.

1. The first part of Paragraph E containing the hand written language prepared by the realtor for the Seller is deleted and the following substituted therefore:

At closing, the Purchaser shall have possession of the westerly and southwesterly portion of the Property including the existing smoke stacks. Seller shall vacate this agreed upon portion of the Property within two weeks from closing to allow Purchaser to demolish the buildings and improvements located on this portion of the Property. Seller shall possess the balance of the Property for a period up to and including 210 days from closing without rent payable by Seller to Purchaser. During the time from closing to vacating the Property, Seller shall be responsible for the payment of all utility charges including but not limited to gas, water, electrical and sewer at the Property. Notwithstanding this provision, the Seller shall use its best efforts to vacate the balance of the Property as soon as possible consistent with the continued operation of Seller's business. Seller has informed Purchaser that Seller has located a building to purchase and anticipates vacating the Property as quickly as possible

2. Paragraph F is deleted in its entirety and the following substituted therefore:

F. Closing. The closing on the sale shall take place at Meridian Title Company, Elkhart, Indiana on or before June 27, 2005 or at the end of the Due Diligence Period, whichever is later ("Closing Date") or this agreement shall terminate unless the Closing Date is extended in writing by Seller and Purchaser which agreement shall be signed without either Seller or Purchaser withholding consent.

3. Paragraph J (4) is amended by adding subparagraph 3 as follows:

Access to and Inspection of Property. Seller hereby consents to entry upon the Property by Purchaser and Purchaser's consultant for the purpose of conducting an additional Phase II environmental site assessment and asbestos abatement survey. Such inspection and testing shall be conducted in a reasonable manner and shall not interfere with the current operation of the Property. The inspection and testing shall be conducted at the sole cost and expense of the Purchaser. Purchaser hereby agrees that the results of any such testing and any reports or data generated in the course of conducting the environmental assessment and testing shall be deemed confidential and not disclosed to third parties, absent an order of administrative or judicial body

mandating such disclosure. The Purchaser agrees to pay the cost of all environmental assessments conducted for the Property.

4. On the Closing Date, the Seller and Purchaser agree to sign an environmental agreement releasing Seller from environmental liabilities other than those environmental liabilities caused by Seller during the time they owned the Property.

IN WITNESS WHEREOF, the undersigned have executed this Addendum as of the date set forth above.

Rick Hollar

Nona Hollar

Seller

R 11, L.L.C. or its assignee entity

By: Ralph Levin, Member

Purchaser

ENVIRONMENTAL RELEASE

WHEREAS R 11, LLC entered into a real estate purchase agreement as the Buyer with Rick Hollar and Nona Hollar as Sellers dated January 31, 2005, as amended, for the purchase of the property commonly known as 1613 Oakland Avenue, Elkhart, Indiana;

WHEREAS, Sturgis Iron and Metal Company, Inc. is the assignee of R 11, LLC;

WHEREAS, R 11, LLC and/or Sturgis Iron and Metal Company, Inc., through their agents have conducted extensive environmental investigations of the said real estate;

THEREFORE, in consideration of One Dollar ($1.00) and other good and valuable consideration, the receipt and sufficiency of which is hereby acknowledged, Sturgis Iron and Metal Company, Inc. hereby release Rick Hollar and Nona Hollar from any and all liability for the environmental condition of the said real estate. Notwithstanding the foregoing, the said Release does not apply to any environmental contamination which occurred during the period the said real estate was owned by Rick Hollar and Nona Hollar.

Without limiting the foregoing, this Release shall apply to any common law cause of action or any statutory cause of action under the Federal Resource Conservation and Recovery Act, the Comprehensive Environmental Response Compensation and Liability Act, the Solid Waste Disposal Act, and any other comparable state, federal, or local environmental law or regulation.

This Release shall survive the closing and delivery of the deed.

Dated: 6-28, 2005.

Sturgis Iron and Metal, Inc.

By: Ralph Lewis

msw\agree\r11sim-envrel\jvw\mj

John Dresser

From: "James Hughey" <JHughey@meridiantitle.com>
To: "James V. Woodsmall (E-mail)" <jwoodsmall@warrickandboyn.com>; "John Dresser (E-mail)" <jdresser@dresserlaw.com>
Sent: Thursday, June 23, 2005 12:37 PM
Attach: C1223E05(1099)Nona.doc; C1223E05(1099)Rick.doc; c1223E05Deed.doc; C1223E05Disc.tif; C1223E05DisclosurePOA.doc; C1223E05Settlement.pdf; C1223E05SettlementComm.pdf; C1223E05Vendors.doc
Subject: C1223E05

Attached, please find draft settlement in HUD format and a commercial closing statement. The November Taxes will be paid at closing. I have revised the deed to reference possible easements within vacated alleys.

Jim, I will send by seperate email the 1031 documents.

Also attached, please find copies of Transfer documents for review and comments. Per request, I have included some lanuage regarding tenant in possession on the Vendor's Statement.

I will forward a revised commitment and Mark Up later today.

James Hughey
Meridian Title Corporation
405 S. Second St., Suite 100
Elkhart, IN 46516-3244
Phone: (574) 293-3075
Fax: (574) 523-0449
Cell: (574) 849-8886

http://www.meridiantitle.com

<<C1223E05(1099)Nona.doc>> <<C1223E05(1099)Rick.doc>> <<c1223E05Deed.doc>> <<C1223E05Disc.tif>> <<C1223E05DisclosurePOA.doc>> <<C1223E05Settlement.pdf>> <<C1223E05SettlementComm.pdf>> <<C1223E05Vendors.doc>>

Confidentiality Notice: This e-mail message, including any attachments, is for the sole use of the recipient and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact JHughey@meridiantitle.com by reply e-mail and destroy all copies of the original message.

A. U.S. Department of Housing and Urban Development	B. Type of Loan		
	1. [ ] FHA	2. [ ] FMHA	3. [ ] Conv. Unins.
	4. [ ] VA	5. [ ] Conv. Ins.	
	6. File Number: C1223E05	7. Loan Number:	
Settlement Statement	8. Mortgage Ins. Case No.		

C. Note:	This form is furnished to give you a statement of actual settlement costs. Amounts paid to and by the settlement agent are shown. Items marked ("POC") were paid outside the closing: they are shown here for information purposes and are not included in the totals.
D. Name of Borrower:	Sturgis Iron and Metal Co., Inc., P.O. Box 579, 70675 S. CENTERVILLE RD, Sturgis, MI 49091
E. Name of Seller:	Rick Hollar, 19456 CR 104, Bristol, IN 46507 TIN: Nona Hollar, 19456 CR 104, Bristol, IN 46507 TIN:
F. Name of Lender:	
G. Property Location:	7-37-5; Lot 106, West Elkhart; Lot 107, West Elkhart; Lot 107, West Elkhart; Lot 108, West Elkhart; Lot 108&109, West Elkhart; Lot 111, West Elkhart; Lot 112, West Elkhart; Lot 112, West Elkhart 1631 Oakland, Elkhart, IN
H. Settlement Agent:	Meridian Title Corporation (800) 777-1574 TIN: 35-0134643
Place of Settlement:	405 S. Second Street, Suite 100, Elkhart, IN 46516
I. Settlement Date:	6/28/2005 **Proration Date:** 6/28/2005

J. Summary of Borrower's Transaction		K. Summary of Seller's Transaction	
100. Gross amount due from borrower:		**400. Gross amount due to seller:**	
101. Contract sales price	400,000.00	401. Contract sales price	400,000.00
102. Personal property		402. Personal property	
103. Settlement charges to borrower (line 1400)	325.00	403.	
104.		404.	
105.		405.	
Adjustments for items paid by seller in advance		**Adjustments for items paid by seller in advance**	
106. City/town taxes		406. City/town taxes	
107. County taxes		407. County taxes	
108. Assessments		408. Assessments	
109.		409.	
110.		410.	
111.		411.	
112.		412.	
120. Gross amount due from borrower:	400,325.00	**420. Gross amount due to seller:**	400,000.00
200. Amounts paid by or in behalf of the borrower:		**500. Reduction in amount due to seller:**	
201. Deposit or earnest money	10,000.00	501. Excess deposit (see instructions)	
202. Principal amount of new loan(s)		502. Settlement charges to seller (line 1400)	21,400.00
203. Existing loan(s) taken subject to		503. Existing loan(s) taken subject to	
204.		504. Payoff of first mortgage loan KeyBank	16,042.52
205.		505. Payoff of second mortgage loan	
206.		506.	
207.		507.	
208.		508.	
209.		509.	
Adjustments for items unpaid by seller		**Adjustments for items unpaid by seller**	
210. City/town taxes		510. City/town taxes	
211. County taxes 1/1/2005 to 6/28/2005	4,133.36	511. County taxes 1/1/2005 to 6/28/2005	4,133.36
212. Assessments		512. Assessments	
213.		513.	
214.		514.	
215.		515.	
216.		516. 04 pay 05 Taxes	4,237.85
217.		517.	
218.		518.	
219.		519.	
220. Total paid by/for borrower:	14,133.36	**520. Total reduction in amount due seller:**	45,813.73
300. Cash at settlement from/to borrower		**600. Cash at settlement to/from seller**	
301. Gross amount due from borrower (line 120)	400,325.00	601. Gross amount due to seller (line 420)	400,000.00
302. Less amount paid by/for borrower (line 220)	14,133.36	602. Less total reduction in amount due seller(line 520)	45,813.73
303. CASH (X)FROM ()TO BORROWER	386,191.64	**603. CASH ()FROM (X)TO SELLER**	354,186.27

L. Settlement Charges 6/23/05 10:15 AM		File Number: C1223E05	
700.	Total sales/broker commission based on : $400,000.00 @ 5.0000% = $20,000.00	Paid From Borrower's Funds at Settlement	Paid From Seller's Funds at Settlement
	Division of commission (line 700) as follows:		
701.	$20,000.00 to A Progressive Realty		
702.			
703.	Commission paid at settlement $20,000.00		20,000.00
704.	$10,000.00 earnest money retained by Listing Broker as POC.		
800.	Items payable in connection with loan		
801.	Loan origination fee		
802.	Loan discount		
803.	Appraisal fee		
804.	Credit report		
805.	Lender's inspection fee		
806.	Mortgage insurance application fee		
807.	Assumption fee		
808.			
809.			
810.			
811.			
812.			
900.	Items required by lender to be paid in advance		
901.	Interest from		
902.	Mortgage insurance premium for		
903.	Hazard insurance premium for		
904.			
905.			
1000.	Reserves deposited with lender		
1001.	Hazard insurance		
1002.	Mortgage insurance		
1003.	City property taxes		
1004.	County property taxes		
1005.	Annual assessments (maint.)		
1006.			
1007.			
1008.			
1009.	Aggregate Accounting Adjustment		
1100.	Title charges		
1101.	Settlement or closing fee to Meridian Title	200.00	200.00
1102.	Abstract or title search		
1103.	Title examination		
1104.	Title insurance binder		
1105.	Document preparation to Debra A. Guy		50.00
1106.	Notary fees		
1107.	Attorney's fees to		
	includes above items no.:		
1108.	Title insurance to Meridian Title Corporation		1,100.00
	includes above items no.:		
1109.	Lender's coverage		
1110.	Owner's coverage $400,000.00 $1,100.00		
1111.	Processing Fee		
1112.	Administrative Fee		
1113.	Express Mail Service Fee to Meridian Title	40.00	
1200.	Government recording and transfer charges		
1201.	Recording fees: Release $50.00		50.00
1202.	City/county tax/stamps:		
1203.	State tax/stamps:		
1204.			
1205.	County R.E. Certification		
1206.	Recording/Filing Service Fee to Meridian Title	85.00	
1300.	Additional settlement charges		
1301.	Survey Paid Outside Closing by Buyer		
1302.	Pest inspection		
1303.	Environmental Cleanup POC by Buyer		
1304.			
1305.			
1400.	Total settlement charges (entered on lines 103, section J and 502, section K)	325.00	21,400.00

CERTIFICATION: I have carefully reviewed the HUD-1 Settlement Statement and to the best of my knowledge and belief, it is a true and accurate statement of all receipts and disbursements made on my account or by me in this transaction. I further certify that I have received a copy of HUD-1 Settlement Statement.

Sturgis Iron and Metal Co., Inc., a Michigan corporation

By:

Meridian Title Corporation, Qualified Intermediary

Approved by Rick Hollar

Approved by Nona Hollar

To the best of my knowledge, the HUD-1 Settlement Statement which I have prepared is a true and accurate account of the funds which were received and have been or will be disbursed by the undersigned as part of the settlement of this transaction.

Meridian Title Corporation (800) 777-1574

Date

LIMITED POWER OF ATTORNEY
FOR PREPARATION, COMPLETION AND SIGNATURE
OF THE INDIANA SALES DISCLOSURE FORM

Know all men by these presents that the undersigned Buyer(s) and Seller(s) do hereby make, constitute and appoint Meridian Title Corporation or its designated agent

to be my/our true and lawful attorney, for me/us and in my/our name, place and stead to do any and all of the following:

1. To prepare, complete and, if necessary, sign the Indiana Sales Disclosure Form for the property located at: 1631 Oakland, Elkhart, IN

This power shall not be affected by my/our later disability or incompetence.

I/We give and grant to my/our said Attorney-in-Fact full power and authority to do and perform all and every act and thing requisite or proper to be done in the exercise of the rights and powers herein granted, as fully, to all intents and purposes, as I/we might or could do if personally present, with full power and substitution and revocation and with full authority to deal with the property as authorized above hereby ratifying and confirming all that my/our said Attorney-in-Fact, or his/her substitute, or substitutes, lawfully do or cause to be done by virtue of the authority granted herein.

Signed this ____ day of June, 2005.

SELLER(S)

_____
Rick Hollar

_____
Nona Hollar

BUYER(S)

Sturgis Iron and Metal Co., Inc., a Michigan Corporation

By: _____

State of Indiana, County of Elkhart ss:

Before me, the undersigned, a Notary Public in and for said County and State aforesaid, on this ____ day of June, 2005, personally appeared _____, of Sturgis Iron and Metal Co., Inc., a Michigan Corporation who acknowledged execution of the foregoing power of attorney to be a voluntary act and deed for the uses and purposes therein set forth.

WITNESS, my hand and Notary Seal.

My Commission Expires: _____

_____
Signature of Notary Public

_____
Printed Name of Notary Public

_____
Notary Public County and State of Residence

State of Indiana, County of Elkhart ss:

Before me, the undersigned, a Notary Public in and for said County and State aforesaid, on this ____ day of June, 2005, personally appeared Rick Hollar and Nona Hollar, Husband and Wife who acknowledged the execution of the foregoing power of attorney to be a voluntary act and deed for the uses and purposes therein set forth.

WITNESS, my hand and Notary Seal.

My Commission Expires: _____

_____
Signature of Notary Public

_____
Printed Name of Notary Public

_____
Notary Public County and State of Residence

This instrument was prepared by: Debra A. Guy, Attorney-at-Law #24473-71.
202 S. Michigan St., Ste. 1000, South Bend, IN 46601
C1223E05

RETURN TO: **HOLD FOR MERIDIAN TITLE CORP.**

Mail Tax Notices To:

Tax ID No. 20-06-07-430-001-000-012
20-06-07-430-007-000-012
20-06-07-430-008-000-012
20-06-07-430-009-000-012
20-06-07-430-010-000-012
20-06-07-430-011-000-012
20-06-07-430-012-000-012
20-06-07-430-013-000-012
20-06-07-430-014-000-012

Property Address:
1631 Oakland
Elkhart, IN

WARRANTY DEED

THIS INDENTURE WITNESSETH

Rick Hollar and Nona Hollar, Husband and Wife

CONVEY(S) AND WARRANT(S) TO

Sturgis Iron and Metal Co., Inc., a Michigan Corporation, for Ten Dollars and other valuable consideration the receipt whereof is hereby acknowledged, the following described REAL ESTATE in Elkhart County, in the State of Indiana, to wit:

A part of the Southeast Quarter (SE ¼) of Section Seven (7) Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:
Beginning in the center of the vacated alley, at a point eight and one-fourth (8 ¼) feet West of the Southwest corner of Lot Numbered Three Hundred sixty-two (362) in Elliston's Addition to the City of Elkhart; thence North along the centerline of said vacated alley, Two Hundred three (203) feet; thence East Eight and One-fourth (8 ¼) feet to the East line of the alley; thence North along the East line of said alley to the Northwest corner of Lot Numbered One Hundred Ten (110) in West Elkhart Addition; thence West Sixteen and one-half (16 ½) feet to the West line of the alley; thence North along the West line of said alley to the South line of Garfield Avenue; thence Northeasterly Sixty-three and ninety-eight hundredths (63.98) feet to the Southwest corner of Lot Numbered Three Hundred seventy-six (376) in the vacated Elliston's Addition; thence Northeasterly on the Northern line of Garfield Avenue Fifty (50) feet to the Southwest corner of Lot Numbered Sixty-four (64) in West Elkhart Addition; thence Northwestwardly along the Westerly line of said Lot Sixty-four (64), One Hundred twenty-seven and ninety-five hundredths (127.95) feet to the Grounds of the Lake Shore and Michigan Southern Railway Company; thence Southwesterly along the Southerly line of said Railway Company ground Two Hundred seventy-two and three tenths (272.3) feet to an iron stake; thence South, parallel with Oakland Avenue, One Hundred fifty-five and eighty-five hundredths(155.85) feet; thence East thirty-three (33) feet; thence South parallel with Oakland Avenue, Two Hundred fifty-five and six tenths (255.6) feet; thence East, Thirty-three (33) feet to the East line of Thirteenth Street; thence South on the East line of said Thirteenth Street, One Hundred twenty-two and twenty-five hundredths (122.25) feet to the northwest corner of Lot Numbered Three Hundred sixty (360) in Elliston's Addition; thence East on the North line of said Lot Numbered Three Hundred sixty (360) and said North line extended to the point of beginning.

ALSO: Lots Numbered One Hundred Six (106), One Hundred Seven (107), One Hundred Eight (108), One Hundred Nine (109), One Hundred Ten (110), One Hundred Eleven (111) and One Hundred Twelve (112) as the said Lots are known and designated on the recorded Plat of ELLIS BROTHERS WEST ELKHART ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 60, page 208 in the Office of the Recorder of Elkhart County, Indiana.

Subject to taxes for the year 2005, due and payable in 2006, and taxes for all subsequent years.

Subject to covenants, restrictions and easements of record including but not limited to Rights of public utility companies to continue to use the vacated streets and alleys.

IN WITNESS WHEREOF, the Grantor has executed this deed this ___ day of June, 2005.

Rick Hollar

Nona Hollar

State of Indiana, County of Elkhart ss:

Before me, the undersigned, a Notary Public in and for said County and State, personally appeared the within named Rick

SALES DISCLOSURE FORM

State Form 46021 (R4/9-04)

Prescribed by Department of Local Government Finance
Pursuant to IC 6-1.1-5.5

PRIVACY NOTICE: The telephone numbers of the parties on this form are confidential according to IC 6-1.1-5.5-3(d)

PART 1 - To be completed by BUYER/GRANTEE and SELLER/GRANTOR (typed or printed in black ink)

PROPERTY TRANSFERRED

Parcel Number(s) (Show additional parcels on separate sheet if necessary.) | Acreage or Lot Size | Part of Parcel (split)

Address: 1631 Oakland | # of Parcels

City, Town, or Post Office: Elkhart | State: IN | ZIP Code

Tax Billing Address (if other than property address)

City, Town, or Post Office | State | ZIP Code

Legal Description

See Attached Legal Description
()

CONDITIONS

Identify all conditions/items that apply

NOTE: If items 12-21 apply, filers are not subject to disclosure filing fee.

- ○ 1-Buyer is an adjacent property owner
- ○ 2-Vacant Land
- ○ 3-Exchange for other real property ("Trade")
- ○ 4-Seller Paid Points; amount if applicable
  $, ,
- ○ 5-Change planned primary use of property? Describe in special circumstances
- ○ 6-Existence of family or business relationship between buyer and seller
- ○ 7-Land Contract Dated:
- ○ 8-Personal property included in transfer, amount if applicable
  $, ,
- ○ 9-Significant physical changes to property between March 1 and date of sale
- ○ 10-Non-warranty deed; specify type
- ○ 11-Partial Interest. Describe in special circumstances
- ○ 12-Security interest documents such as mortgages or trust deeds.
- ○ 13-Leases less than 99 years.
- ○ 14-Document resulting from foreclosure, or express threat of foreclosure, divorce court order, condemnation,, probate or other judicial proceedings
- ○ 15-Agreements and other documents for mergers, consolidations, and incorporations
- ○ 16-Quitclaim deeds not serving as a source of title
- ○ 17-Documents involving the partition of land between tenants in common, joint tenants, or tenants by the entirety.
- ○ 18-Transfer to a charity, not for profit or government institution
- ○ 19-Transfer for no or discounted consideration, or gift
- ○ 20-Rerecording to correct prior recorded document
- ○ 21-Easements, Right-of-way grants

SALES DATA

Contract Date (MM/DD/YYYY): 06 / 28 / 2005 | Sales Price: $, 400 , 000 .

Describe any unusual or special circumstances related to this sale, including the specification of any less-than-complete ownership interest and terms of seller financing.

INDIANA SALES DISCLOSURE FORM

PART 1 - To be completed by BUYER/GRANTEE and SELLER/GRANTOR (typed or printed in black ink)

Seller(s)/Grantor(s)

Seller 1 - Name or Entity as appears on deed: Rick Hollar

Address: 19456 CR 104

City, Town, or Post Office: Bristol | State: IN | ZIP Code: 46507 -

Seller 2 - Name or Entity as appears on deed: Nona Hollar

Address: 19456 CR 104

City, Town, or Post Office: Bristol | State: IN | ZIP Code: 46507 -

Title Company Name (if applicable): Meridian Title Corporation | Title Company Phone: 800-777-1574

Buyer(s)/Grantee(s)

Buyer 1 - Name or Entity as appears on deed: Sturgis Iron and Metal Co., Inc.

Will this property be the buyer's primary residence? ○ Yes ⊘ No

Address: 70675 S. CENTERVILLE RD

City, Town, or Post Office: Sturgis | State: MI | ZIP Code: 49091 -

Buyer 2 - Name or Entity as appears on deed:

Address:

City, Town, or Post Office: | State: | ZIP Code: -

Signatures

Under penalties of perjury, I hereby certify that this Sales Disclosure, to the best of my knowledge and belief, is true, correct and complete as required by law, and is prepared in accordance with IC 6-1.1-5.5, "Real Property Sales Disclosure Act".

Signature of Seller:

Seller Sign Date (MM/DD/YYYY): 06/28/2005

Seller Phone: - -

Signature of Buyer:

Buyer Sign Date (MM/DD/YYYY): 06/28/2005

Buyer Phone: - -

PART 2 - COUNTY AUDITOR

AUDITOR'S FILE STAMP

Completion ○ Yes ○ No

Date Entered in Transfer Book: / /

PART 3 - COUNTY OR TOWNSHIP ASSESSOR

County Assessor or other assessing official must verify and complete the following information:

○ Significant physical changes to property between March 1 and date of sale

$, , AV LAND

Property class / use code

Taxing District (DLGF assigned)

$, , AV IMPV

$, , AV TOTAL

○ Valid Sale

NEIGHBORHOOD CODE

INDIANA SALES DISCLOSURE FORM

INSTRUCTIONS

Indiana law requires a sales disclosure form to be completed when a conveyance document (see definition below) is filed with the county auditor. The county auditor may not accept a conveyance if (1) the sales disclosure form is not included with the conveyance document; or (2) the sales disclosure form is incomplete. A person filing a sales disclosure form shall pay a fee of ten dollars ($10.00) to the county auditor.

PART 1: BUYER AND SELLER INFORMATION

Property Transferred Information. Either the buyer/grantee or the seller/grantor should provide the parcel number(s) (including all dashes and decimals), full address, tax billing address, lot size, and legal description of the parcel(s) transferred. A legal description is especially important for metes and bounds descriptions and new parcels. If the transaction consists of more than three parcels, an additional list of parcel numbers and lot sizes must be attached to this document.

Sales conditions/items. The information in this section is used to determine sales characteristics, establish market value, determine applicability of the sale and for use in ratio or other studies. The appropriate circle or circles should be filled in for all conditions/items that apply to the sale. With regard to personal property (see definitions below), the buyer or seller must enter an estimated value of the personal property included in the sale. Similarly, the buyer and seller must enter the amount of seller paid points as applicable. Please note that while indicating that certain conditions/items will result in not paying a filing fee, the buyer/grantee or seller/grantor is still responsible for completing the form in full.

Sales Data. The date and sales price of the property transfer is to be printed in the spaces provided. Any unusual or special conditions of the sale that may affect the sales price or terms of the sales agreement should also be described.

Seller/Grantor Information. Seller(s)/grantor(s) are to provide the full name and address for seller(s) or entity as applicable. If there are more than two individuals or entities involved in the transaction, additional ownership information must be included in an attachment to this form. The seller/grantor must also provide, if applicable, the name and telephone number of the title company that handled the transaction.

Buyer/Grantee Information. Buyer(s)/grantee(s) are to provide the full name and address for buyer(s) or entity as applicable. If there are more than two individuals or entities involved in the transaction, additional ownership information must be included in an attachment to this form. The buyer/grantee must also indicate whether the property will be used as a residential primary residence.

Signature and Verification. The buyer/grantee, seller/grantor or their representatives must sign one (1) sales disclosure form, or if the parties do not agree on the information to be included on the completed form, each party must sign and file a separate form. If anyone other than the buyer/seller or an attorney of the buyer/seller is filling out the form, a properly executed Power of Attorney must be completed and attached. **A person who knowingly and intentionally falsifies or omits any information required on this form commits a Class A infraction.**

PART 2: COUNTY AUDITOR RESPONSIBILITY

The county auditor is responsible for collecting the filing fee as well as ensuring that all parties to the conveyance have completed and signed the form as required. The county auditor may not accept the sales disclosure statement if the statement is not signed by the buyer or seller. If the buyer or seller fails to completely fill out their designated portion of the form, the county auditor may not accept the conveyance document. The county auditor must also confirm the date the property was duly entered for transfer.

PART 3: COUNTY ASSESSOR INFORMATION

The county assessor is responsible for determining whether or not significant physical changes have been made to the property between March 1 and the date of sale. The county assessor is also responsible for entering property class or use codes, the proper department of local government finance taxing district number, the current assessed value, and neighborhood code information. The county assessor and/or other assessing officials are responsible for verifying the sale as well (note that verification is not required prior to submitting sales data to the DLGF). Sales disclosure forms provided in response to public records requests should not include phone numbers.

Definitions

Conveyance Document means any document, land sale contract, deed, quitclaim deed serving as a source of title, or other document presented for recording, that purports to transfer a real property interest for valuable consideration.

Personal property – items that are not attached (built-in or affixed) to the real estate (land and buildings). This might include items such as washers, dryers, window treatments, stoves and refrigerators. Other items considered personal property are boats and other vehicles, inventories (livestock, goods in process or for trade, or agricultural commodities) and machinery used in farming or manufacturing.

VENDOR'S AFFIDAVIT

Rick Hollar and Nona Hollar, Husband and wife (hereinafter referred to, jointly and severally as "Vendor") being first duly sworn state(s) that conveyance is being made, this day, to Sturgis Iron and Metal Co., Inc., a Michigan Corporation (hereinafter referred to, jointly and severally, as "Purchaser"), by Warranty Deed, the following described Real Estate located in Elkhart County, Indiana:

A part of the Southeast Quarter (SE ¼) of Section Seven (7) Township Thirty-seven (37) North, Range Five (5) East, more particularly described as follows:

Beginning in the center of the vacated alley, at a point eight and one-fourth (8 ¼) feet West of the Southwest corner of Lot Numbered Three Hundred sixty-two (362) in Elliston's Addition to the City of Elkhart; thence North along the centerline of said vacated alley, Two Hundred three (203) feet; thence East Eight and One-fourth (8 ¼) feet to the East line of the alley; thence North along the East line of said alley to the Northwest corner of Lot Numbered One Hundred Ten (110) in West Elkhart Addition; thence West Sixteen and one-half (16 ½) feet to the West line of the alley; thence North along the West line of said alley to the South line of Garfield Avenue; thence Northeasterly Sixty-three and ninety-eight hundredths (63.98) feet to the Southwest corner of Lot Numbered Three Hundred seventy-six (376) in the vacated Elliston Addition; thence Northeasterly on the Northern line of Garfield Avenue Fifty (50) feet to the Southwest corner of Lot Numbered Sixty-four (64) in West Elkhart Addition; thence Northwestwardly along the Westerly line of said Lot Sixty-four (64), One Hundred twenty-seven and ninety-five hundredths (127.95) feet to the Grounds of the Lake Shore and Michigan Southern Railway Company; thence Southwesterly along the Southerly line of said Railway Company ground Two Hundred seventy-two and three tenths (272.3) feet to an iron stake; thence South, parallel with Oakland Avenue, One Hundred fifty-five and eighty-five hundredths(155.85) feet; thence East thirty-three (33) feet; thence South parallel with Oakland Avenue, Two Hundred fifty-five and six tenths (255.6) feet; thence East, Thirty-three (33) feet to the East line of Thirteenth Street; thence South on the East line of said Thirteenth Street, One Hundred twenty-two and twenty-five hundredths (122.25) feet to the northwest corner of Lot Numbered Three Hundred sixty (360) in Elliston Addition; thence East on the North line of said Lot Numbered Three Hundred sixty (360) and said North line extended to the point of beginning.

ALSO: Lots Numbered One Hundred Six (106), One Hundred Seven (107), One Hundred Eight (108), One Hundred Nine (109), One Hundred Ten (110), One Hundred Eleven (111) and One Hundred Twelve (112) as the said Lots are known and designated on the recorded Plat of ELLIS BROTHERS WEST ELKHART ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 60, page 208 in the Office of the Recorder of Elkhart County, Indiana.

and commonly known as 1631 Oakland, Elkhart, Indiana (street address) (hereinafter referred to as "Real Estate").

In connection with the sale of the Real Estate, Vendor has furnished Purchaser with a commitment for an owner's policy of title insurance for the Real Estate under date of June 2, 2005 at 8:00 AM issued by Meridian Title Corporation as File No. C1223E05.

Vendor has an indefeasible estate in fee simple in the Real Estate and the Real Estate is free and clear of every kind or description of lien, lease or encumbrance EXCEPT the following:

1. Current real estate taxes, not delinquent.
2. Such other matters affecting the Real Estate, if any, as are disclosed in the above commitment for title insurance.

Vendor has not executed, or permitted anyone on Vendor's behalf to execute, any conveyance, mortgage, lien, lease, security agreement, financing statement or encumbrance of or upon the Real Estate or any fixtures attached thereto, except as stated above, which is now outstanding or enforceable against the Real Estate. Vendor has made no contract to sell all or a part of the Real Estate to any person other than the Purchaser, and Vendor has not given to any person an option or right of first refusal to purchase all or any part of the Real Estate, which is enforceable or exercisable now or at any time in the future. There are no unpaid claims for labor done upon or materials or equipment furnished for the Real estate in respect of which liens have been or may be filed, and to the best knowledge and belief of Affiant, the

Vendor has 210 days to vacate and remove equipment from the premises.

Vendor is not acting, directly or indirectly, in any capacity whatsoever for any foreign country or nation thereof, and Vendor is more than eighteen (18) years of age and a citizen of the United States.

Vendor has not received any bill, invoice or statement for special assessment of the Real Estate for public improvements thereto, nor any bill, invoice or statement for any special tax levy, and that neither the Vendor, nor affiant(s) (if different than Vendor) have received any notice or have any knowledge of any pending proceedings for the special assessment or special taxation of the Real Estate.

Vendor intends that each of the statements made herein shall be construed as a representation; each of the representations is made for the purpose of inducing Purchaser to purchase the Real Estate; and each of the representations, whether construed jointly or severally, is true. Vendor expressly authorizes Purchaser and the Title Insurance Company, and all other persons to rely on such representations.

_____ Rick Hollar

_____ Nona Hollar

State of Indiana, County of Elkhart ss:

Subscribed and sworn to before me, a Notary Public in and for said County and State, this ___ day of June, 2005.

My Commission Expires: _____

_____ Signature of Notary Public

_____ Printed Name of Notary Public

_____ Notary Public County and State of Residence

This instrument was prepared by: Debra A. Guy, Attorney-at-Law #24473-71.

thence South parallel with Oakland Avenue, Two Hundred fifty-five and six tenths (255.6) feet; thence East, Thirty-three (33) feet to the East line of Thirteenth Street; thence South on the East line of said Thirteenth Street, One Hundred twenty-two and twenty-five hundredths (122.25) feet to the northwest corner of Lot Numbered Three Hundred sixty (360) in Elliston Addition; thence East on the North line of said Lot Numbered Three Hundred sixty (360) and said North line extended to the point of beginning.

ALSO: Lots Numbered One Hundred Six (106), One Hundred Seven (107), One Hundred Eight (108), One Hundred Nine (109), One Hundred Ten (110), One Hundred Eleven (111) and One Hundred Twelve (112) as the said Lots are known and designated on the recorded Plat of ELLIS BROTHERS WEST ELKHART ADDITION to the City of Elkhart; said Plat being recorded in Deed Record 60, page 208 in the Office of the Recorder of Elkhart County, Indiana.

THE FOLLOWING ARE THE REQUIREMENTS TO BE COMPLIED WITH:

1. Instruments necessary to create the estate or interest to be insured must be properly executed, delivered and duly filed for record.

   a) *Properly executed and acknowledged Warranty Deed to the proposed insured.*

2. Payment and release of a Mortgage in the amount of $52,141.90 from Rick Hollar and Nona Hollar, husband and wife to KeyBank National Association dated January 2, 2004 and recorded January 8, 2004 as Document Number 2004-00800 in the Office of the Recorder of Elkhart County, Indiana.

3. Payment and release of a Mortgage in the amount of $156,228.60 from Rick Hollar and Nona Hollar, husband and wife to KeyBank National Association dated January 2, 2004 and recorded January 9, 2004 as Document Number 2004-00863 in the Office of the Recorder of Elkhart County, Indiana.

4. Release of Compliance with Substandard Repair Order by Code Enforcement Division of the City of Elkhart, State of Indiana, Order No. 03-06-16-04 recorded December 9, 2004 in the Office of the Recorder of Elkhart County, State of Indiana.
   The Company assumes no responsibility for loss or damages, or costs occasioned by non-compliance with such Order.

THE POLICY OR POLICIES TO BE ISSUED WILL CONTAIN EXCEPTIONS TO THE FOLLOWING MATTERS UNLESS THE SAME ARE DISPOSED OF TO THE SATISFACTION OF THE COMPANY.

1. Defects, liens, encumbrances, adverse claims, or other matters, if any, created, first appearing in the public records or attaching subsequent to the effective date hereof but prior to the date the proposed Insured acquires for value of record the estate or interest or mortgage thereon covered by this Commitment.

2. Standard Exceptions:
   a) Rights or claims of parties in possession not shown by the public records.
   b) Easements, or claims of easements, not shown by the public records.
   c) Encroachments, overlaps, boundary line disputes, or other matters which would be disclosed by an accurate survey or inspection of the premises.
   d) Any lien, or right to a lien, for services, labor, or material heretofore or hereafter furnished, imposed by law and not shown by the public records.

3. Special Exceptions:
   a) Taxes for the year 2005 payable in 2006 are a lien not yet due and payable.

   Taxes for the year 2004 payable in 2005 are as follows:
   Key No. 20-06-07-430-001-000-012 – Elkhart City Concord Township (Sec 7-37-5)
   1st installment due May 10, 2005 $ 3,590.16 - Paid
   2nd installment due Nov 10, 2005 $ 3,590.16 - Unpaid.

Assessed Valuations:	04-05
Land	$ 152200.00
Improvements	$ 149900.00
Residential Land	$ 0.00
Residential Improvements	$ 0.00
Exemption (Mortgage)	$ 0.00
Exemption (Homeowners)	$ 0.00
Exemption	$ 0.00
Net Valuations	$ 302100.00

   Taxes for the year 2004 payable in 2005 are as follows:
   Key No. 20-06-07-430-007-000-012 – Elkhart City Concord Township (Lot 106)
   1st installment due May 10, 2005 $ 45.16 - Paid
   2nd installment due Nov 10, 2005 $ 45.16 – Unpaid.

Assessed Valuations:	04-05
Land	$ 3800.00
Improvements	$ 0.00
Residential Land	$ 0.00
Residential Improvements	$ 0.00
Exemption (Mortgage)	$ 0.00
Exemption (Homeowners)	$ 0.00
Exemption	$ 0.00
Net Valuations	$ 3800.00

Taxes for the year 2004 payable in 2005 are as follows:
Key No. 20-06-07-430-008-000-012 – Elkhart City Concord Township (Pt Lot 107)
1st installment due May 10, 2005 $ 65.36 - Paid
2nd installment due Nov 10, 2005 $ 65.36 - Unpaid.

Assessed Valuations:		04-05
Land	$	5500.00
Improvements	$	0.00
Residential Land	$	0.00
Residential Improvements	$	0.00
Exemption (Mortgage)	$	0.00
Exemption (Homeowners)	$	0.00
Exemption	$	0.00
Net Valuations	$	5500.00

Taxes for the year 2004 payable in 2005 are as follows:
Key No. 20-06-07-430-009-000-012 – Elkhart City Concord Township (Pt Lot 107)
1st installment due May 10, 2005 $ 30.90 - Paid
2nd installment due Nov 10, 2005 $ 30.90 - Unpaid.

Assessed Valuations:		04-05
Land	$	2600.00
Improvements	$	0.00
Residential Land	$	0.00
Residential Improvements	$	0.00
Exemption (Mortgage)	$	0.00
Exemption (Homeowners)	$	0.00
Exemption	$	0.00
Net Valuations	$	2600.00

Taxes for the year 2004 payable in 2005 are as follows:
Key No. 20-06-07-430-010-000-012 – Elkhart City Concord Township (Pt Lot 108)
1st installment due May 10, 2005 $ 64.17 - Paid
2nd installment due Nov 10, 2004 $ 64.17 - Unpaid.

Assessed Valuations:		04-05
Land	$	5400.00
Improvements	$	0.00
Residential Land	$	0.00
Residential Improvements	$	0.00
Exemption (Mortgage)	$	0.00
Exemption (Homeowners)	$	0.00
Exemption	$	0.00
Net Valuations	$	5400.00

Taxes for the year 2004 payable in 2005 are as follows:
Key No. 20-06-07-430-011-000-012 – Elkhart City Concord Township (Pt Lot 109 & 108)

1st installment due May 10, 2005 $ 137.86 - Paid
2nd installment due Nov 10, 2005 $ 137.86 - Unpaid.

Assessed Valuations:		04-05
Land	$	11600.00
Improvements	$	0.00
Residential Land	$	0.00
Residential Improvements	$	0.00
Exemption (Mortgage)	$	0.00
Exemption (Homeowners)	$	0.00
Exemption	$	0.00
Net Valuations	$	11600.00

Taxes for the year 2004 payable in 2005 are as follows:
Key No. 20-06-07-430-012-000-012 – Elkhart City Concord Township (Pt Lots 110 & 111)
1st installment due May 10, 2005 $ 152.12 - Paid
2nd installment due Nov 10, 2005 $ 152.12 - Unpaid.

Assessed Valuations:		04-05
Land	$	12800.00
Improvements	$	0.00
Residential Land	$	0.00
Residential Improvements	$	0.00
Exemption (Mortgage)	$	0.00
Exemption (Homeowners)	$	0.00
Exemption	$	0.00
Net Valuations	$	12800.00

Taxes for the year 2004 payable in 2005 are as follows:
Key No. 20-06-07-430-013-000-012 – Elkhart City Concord Township (Pt Lots 11 & 112)
1st installment due May 10, 2005 $ 73.68 - Paid
2nd installment due Nov 10, 2005 $ 73.68 - Unpaid.

Assessed Valuations:		04-05
Land	$	6200.00
Improvements	$	0.00
Residential Land	$	0.00
Residential Improvements	$	0.00
Exemption (Mortgage)	$	0.00
Exemption (Homeowners)	$	0.00
Exemption	$	0.00
Net Valuations	$	6200.00

Taxes for the year 2004 payable in 2005 are as follows:
Key No. 20-06-07-430-014-000-012 – Elkhart City Concord Township (Pt Lot 112)
1st installment due May 10, 2005 $ 78.44 - Paid
2nd installment due Nov 10, 2005 $ 78.44 – Unpaid.

Assessed Valuations:		04-05
Land	$	6600.00
Improvements	$	0.00
Residential Land	$	0.00
Residential Improvements	$	0.00
Exemption (Mortgage)	$	0.00
Exemption (Homeowners)	$	0.00
Exemption	$	0.00
Net Valuations	$	6600.00

NOTE: Tax information supra is limited to the date of the most current computer input information in the Treasurer's Office and not necessarily the effective date hereof. A check with the Treasurer's Office should be made to determine the exact amount of taxes due, if any.
PLEASE NOTE EXEMPTION VALUATION INFORMATION MAY NOT BE FULLY POSTED.

b) Rights of public utility companies to continue to use the vacated streets and alleys shown in Item 4 of Schedule "A" herein for the location and maintenance of utility lines as set forth in IC 36-07-3-16.

NOTE: Upon satisfactory evidence from a registered land surveyor that there are no utilities in that portion of the real estate which is a vacated alley, this exception will be deleted.

Privacy Policy Notice

PURPOSE OF THIS NOTICE

Title V of the Gramm-Leach-Bliley Act (GLBA) generally prohibits any financial institution, directly or through its affiliates (including insurance companies and insurance agents), from sharing nonpublic personal information about a consumer with a nonaffiliated third party unless the institution provides the consumer with a notice of its privacy policies and practices, such as type of information that it collects about the consumer and the categories of persons or entities to whom it may be disclosed. In compliance with the GLBA, we are providing you with this document, which notifies you of privacy policies and practices of Lawyers Title Insurance Corporation, or its subsidiaries.
We may collect nonpublic information about you from the following sources:

- information we receive from you, such as on applications or other forms,
- information about your transaction that we secure from our files, from our affiliates or from third parties,
- information we receive from a consumer reporting agency and
- information that we receive from others involved in your transaction, such as the real estate agent or lender.

Unless it is specifically stated otherwise in an amended Privacy Policy Notice, no additional nonpublic information will be collected about you.

If you are concerned about the information we have collected, please write us.

We may disclose any of the above information that we collect about our customers or former customers to our affiliates or to nonaffiliated third parties permitted by law.

WE DO NOT DISCLOSE ANY NONPUBLIC PERSONAL INFORMATION ABOUT YOU WITH ANYONE FOR ANY PURPOSE THAT IS NOT SPECIFICALLY PERMITTED BY LAW.

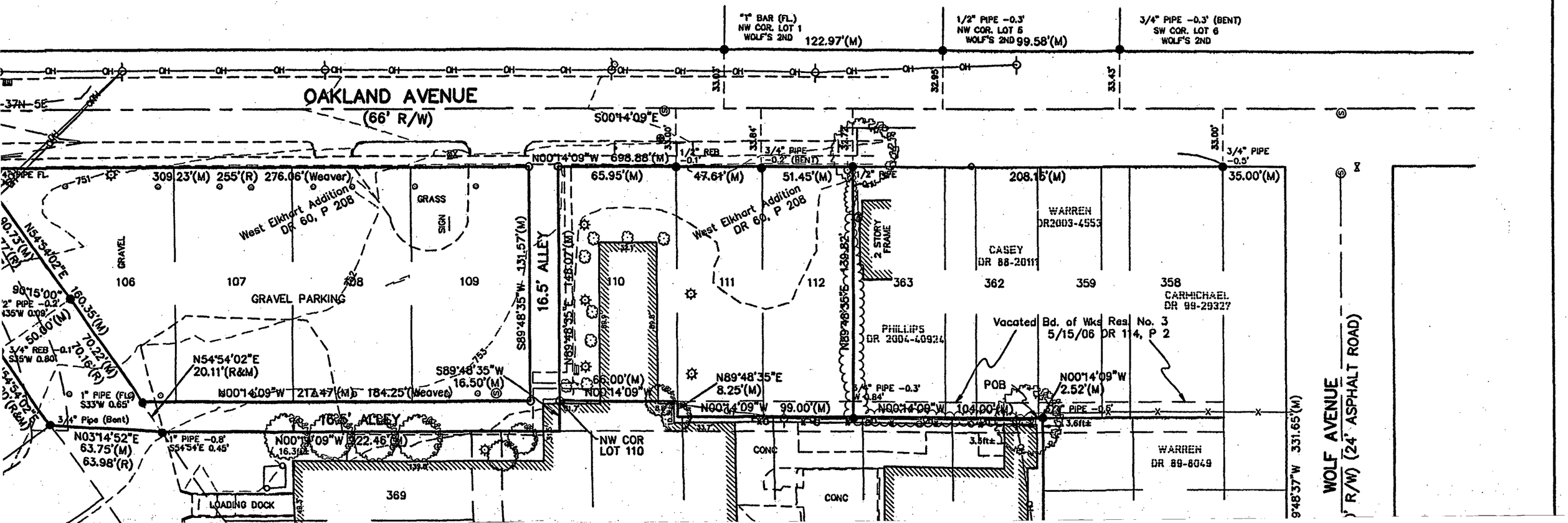
We restrict access to non public personal information about you to those employees who need to know that information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information.

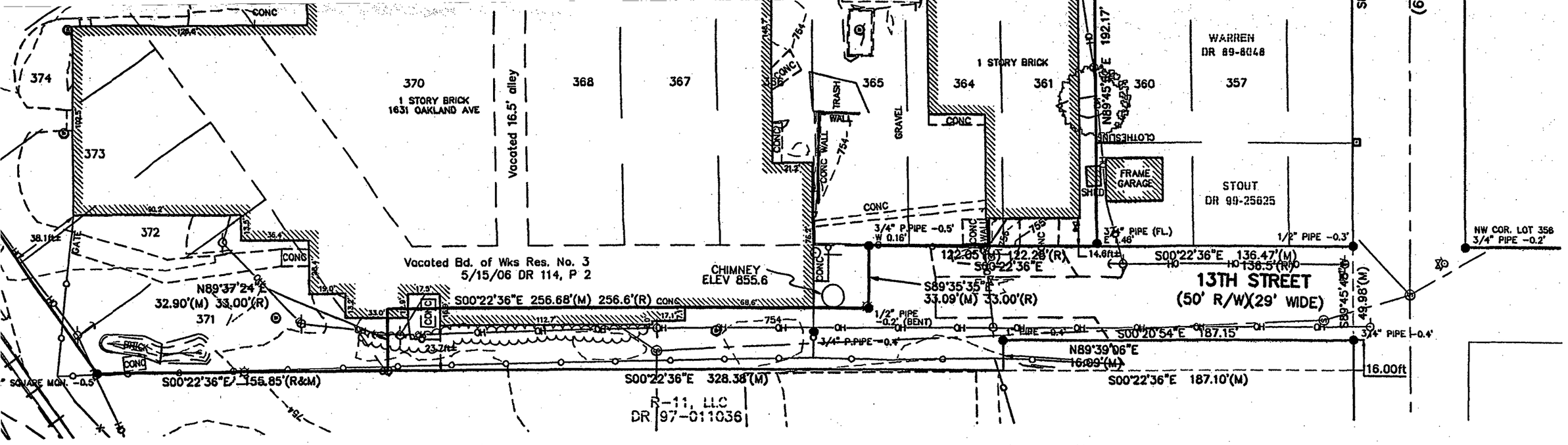
No response to this notice is required, but if you have questions, please write us:

LandAmerica
P.O. Box 27567
Richmond, VA 23261-7567

Certificate of Survey

Located within the Southeast Quarter of Section 7
Township 37 North, Range 5 East, Concord Township, Elkhart County, Indiana





GRAPHIC SCALE

0 25 50 100

(IN FEET)
1 inch = 50 ft.

LEGEND

●	MONUMENT RECOVERED
o	SET REBAR AND CAP
Δ	PK NAIL SET
(r)	RECORD
(m)	MEASURED
FL.	MON. FLUSH WITH GROUND
-0.1'	ELEV OF MON. ABOVE GROUND (TYP.)
——o——	CHAIN LINK FENCE

SHEET 1 OF 2

Wightman Petrie, Inc.
4703 CHESTER DRIVE, ELKHART, IN. 46516
PH: 574-293-7762 FAX: 574-294-3717

CONSULTING ENGINEERS AND LAND SURVEYORS

CLIENT: Sturgis Iron and Metal
2160 So. Centerville, Road
Sturgis, MI. 49091

OWNER: Rick and Nona Hollar

PHONE: REF. DOC. NO.: SEE DRAWING

SCALE: 1"= 50'	DRAWN BY: V. MACE	SURVEYED: 3/10/05	
DATE: 3/10/05	CHECKED BY: MHS 3/25/05	JOB NO. 2005-0053	

PROJ: Sturgis Iron and Metal
DESC: Certificate of Survey
LOC: SE1/4 Section 7-37N-5E, Concord Twp

C-774-1

Certificate of Survey

Located within the Southeast Quarter of Section 7
Township 37 North, Range 5 East, Concord Township, Elkhart County, Indiana

2, Section 1 Through 29 of the Indiana Administrative Code, the following observations certainties in the locations of the lines and corners established on this survey as a

ats;

l Uncertainty);

s in measurement) of the corners of the subject tract established in this survey is

the boundary of that tract described in Meridian Title Corporation file number c1223E05.

ace except as shown.

ced:

e 60, page 208. Said plat shows the widths of Lots 107 through 112 to be 60 feet. Leonard Street (now Garfield Avenue width indicated to be 49.5'. The alley between Lots s such on County Aerial Maps.

lume 111, page 188. This plat replatted all of West Elkhart (see above) except for Lots 2–363 are shown as 52' by 132'. Lots 357, 360–361, & 364–369 are shown as eet wide. Wolf Avenue shown as 50 feet wide and immediately south of Lots 357 &

PE, of parts of the subject property, revised 4–21–70, entitled: "Part SE1/4 Sec. 7, 110–112 inclusive WEST ELKHART ADD.; Lots 364 to 376 inclusive & Lot 361 Vacated field Ave. & Thirteenth St.", drawing Mb1092. Irons from said survey were recovered in The Weaver survey indicates that many record dimensions on both the West Elkhart and –112 on the West Elkhart plat were retraced by Weaver to be 66 feet wide instead of to be 50 feet wide by found monumentation.

Legal Description per Meridian Title file no. c1223E05

A part of the Southeast Quarter (SE 1/4) of Section Seven (7), Township Thirty–seven (37) North, Range Five (5) East, more particularly described as follows:

Beginning in the center of the vacated alley, at a point eight and one–fourth (8 1/4) feet West of the Southwest corner of Lot Numbered Three Hundred sixty–two (362) in Ellistons Addition to the City of Elkhart; thence North along the centerline of said vacated alley, Two Hundred three (203) feet; thence East Eight and One–fourth (8 1/4) feet to the East line of the alley; thence North along the East line of said alley to the Northwest corner of Lot Numbered One Hundred Ten (110) in West Elkhart Addition; thence West Sixteen and one–half (16 1/2) feet to the West line of the alley; thence North along the West line of said alley to the South line of Garfield Avenue; thence Northeasterly Sixty–three and ninety–eight hundredths (63.98) feet to the Southwest corner of Lot Numbered Three Hundred seventy–six (376) in the vacated Elliston Addition; thence Northeasterly on the Northern line of Garfield Avenue Fifty (50) feet to the Southwest corner of Lot Numbered Sixty–four (64) in West Elkhart Addition; thence Northwestwardly along the Westerly line of said Lot Sixty–four (64), One Hundred twenty–seven and ninety–five hundredths (127.95) feet to the Grounds of the Lake Shore and Michigan Southern Railway Company; thence Southwesterly along the Southerly line of said Railway company ground Two Hundred seventy–two and three tenths (272.3) feet to an iron stake; thence South, parallel with Oakland Avenue, One Hundred fifty–five and eighty–five hundredths (155.85) feet; thence East Thirty–three (33) feet; thence South parallel with Oakland Avenue, Two Hundred fifty–five and six tenths (255.6) feet; thence East Thirty–three (33) feet to the East line of Thirteenth Street; thence South on the East line of said Thirteenth Street, One Hundred twenty–two and twenty–five hundredths (122.25) feet to the Northwest corner of Lot Numbered Three Hundred sixty (360) in Elliston Addition; thence East on the North line of said Lot Numbered Three Hundred sixty (360) and said North line extended to the point of beginning.

ALSO: Lots Numbered One Hundred Six (106), One Hundred Seven (107), One Hundred Eight (108), One Hundred Nine (109), One Hundred Ten (110), One Hundred Eleven (111) and One Hundred Twelve (112) as the said lots are known and designated on the recorded Plat of Ellis Brothers West Elkhart Addition to the City of Elkhart, Indiana

) Right of Way and Track Map numbered V215A/2.

33.00 feet east of the line running between the iron recovered at the southeast corner ner of Lot 106 as shown. Offsets to other irons recovered along the east and west awing.

held to lie 2.52 feet north of the iron recovered at the northeast corner of Lot 360, rings along the interior of the block were held to be parallel to the center line of ecovered irons are as shown.

l to match the line between the iron recovered at northeast corner of Lot 106 and the The northwest boundary of Garfield Avenue was held to lie offset 50 feet northwest ed on the road width documented on the above Weaver survey.

l held. The northeast line of Lot 376 was held to match the line between the said found along the northwest line of Lot 106.

371 was held. North-south bearings along the west lines of the subject property were oundary of Thirteenth Street, based on ties shown on the Weaver survey.

cord and measured distances shown. As noted above, there are substantial variances between lots within both Elkhart West and Elliston's Addition.

ise note that the record description does not close. The last course is described as said North line extended to the point of beginning." The said north line extended, which is the southwest corner of Lot 362. The plat of Elliston's Addition makes clear of the south line of Lot 361. This discrepancy is also noted on the Weaver survey.

existing building extends past the subject property boundary is locations shown on the

per information obtained from Flood Insurance Rate Map, National Flood Insurance , Dated June 5, 1985.

nsed in accordance with the laws and statutes in the State of Indiana, hereby certify to sents a survey done by me or under my supervision. In accordance with Title 865, Code.

5

B

PETER H. SCHNAARS REGISTERED #29900028 STATE OF INDIANA LAND SURVEYOR

Record 60, page 208 in the Office of the Recorder of Elkhart County, Indiana.

wpi Wightman Petrie, Inc. 4703 CHESTER DRIVE, ELKHART, IN. 46516 PH: 574-293-7762 FAX: 574-294-3717		CONSULTING ENGINEERS AND LAND SURVEYORS
CLIENT	Sturgis Iron and Metal 2160 So. Centerville Road Sturgis, MI. 49091	
OWNER	Rick and Nona Hollar	
PHONE:		REF. DOC. NO.: SEE DRAWING
SCALE: 1"= 50'	DRAWN BY: V. MACE	SURVEYED: 3/10/05
DATE: 3/10/05	CHECKED BY: PHS 3/25/05	JOB NO. 2005-0053
PROJ: Sturgis Iron and Metal DESC: Certificate of Survey LOC: SE1/4 Section 7-37N-5E, Concord Twp		C-774-1

SHEET 2 OF 2

EXHIBIT 6

PHASE I ESA AND LIMITED COMPLIANCE REVIEW
PATRICK PAINT
1819 South 14th Street
Elkhart, Indiana
ATC PROJECT NO. 86.14217.0002 Task 9

Prepared For:

Patrick Industries, Inc.
1800 South 14th Street
Elkhart, Indiana 46515

Attn: Mr. Keith Kankel

March 3, 2000

ATC ASSOCIATES INC.

5150 East 65th Street
Indianapolis, Indiana 46220
www.atc-enviro.com
317.849.4990
Fax 317.849.4278

March 3, 2000

Mr. Keith Kankel
Patrick Industries, Inc.
1800 South 14th Street
Elkhart, Indiana 46515

Re: Phase I ESA and Limited Compliance Review
PATRICK PAINT
1819 South 14th Street
Elkhart, Indiana
ATC Project No. 86.14217.0002 Task 9

Dear Mr. Kankel:

In accordance with ATC Proposal No. PE-990719R dated November 19, 1999, ATC Associates Inc. (ATC) has performed an Phase I ESA and Limited Compliance Review on the above-referenced site. The purpose of this assessment was to evaluate potential environmental concerns from on-site or off-site sources. A review of Elkhart County and Indiana Department of Environmental Management (IDEM) records was conducted to determine historical use of the property regarding possible hazardous substances usage, storage, or disposal. Public information concerning nearby properties was also reviewed. The attached report provides a summation of the findings of this study. This Phase I ESA and Limited Compliance Review was performed following at a minimum the standards established in the American Society for Testing and Materials (ASTM) document Standard Practice for Environmental Site Assessments: (ASTM Designation: E 1527-97).

We trust this submittal is responsive to your needs. If you have any questions or comments regarding this report, or if we can be of further service to you, please do not hesitate to call.

Sincerely,

ATC ASSOCIATES INC.

Debra B. Gehm
Environmental Scientist

Christopher J. Bishop, CPG
Project Manager

EXECUTIVE SUMMARY

ATC Associates Inc. (ATC) was retained by Patrick Industries, Inc. (Patrick) to conduct an Phase I ESA and Limited Compliance Review, in conformance with the scope and limitations of ASTM Standard Practice for Environmental Site Assessments (E 1527-97), of Patrick Paint located at 1819 South 14th Street in Elkhart, Indiana. On December 8, 1999, ATC visited the site to visually identify potential environmental concerns. Any exceptions to, or deletions from this practice, including client specific requirements, are described in Sections 2.0 and 4.0 of this report.

The site consists of a single-story buildings and associated parking lots and drives comprising of approximately 70 percent of the site. The remainder of the site consists of vacant land covered by vegetation. The facilities operations are the electrostatic spray-painting of aluminum parts for the mobile home and recreational vehicle industry.

ATC reviewed databases and files from federal, state and local environmental regulatory agencies to identify use, generation, storage, treatment or disposal of hazardous materials and chemicals or release incidents of such materials which may impact the subject site. The records reviewed included: Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS), National Priorities List (NPL), Resource Conservation Recovery Information System (RCRIS), Treatment, Storage and Disposal Facilities (TSD) and Large Quantity Generators, Emergency Response Incidence Logs, state registered underground storage tanks (UST), state leaking underground storage tank incident reports (LUST), state solid waste facilities/landfill sites (SWF/LS), state hazardous waste sites (SHWS) and other local records.

This assessment has revealed evidence of recognized environmental conditions in connection with the project site:

- A depression with two drainage pipes was noted on the southwest side of the site. Based on the historical operations of the facility, the depression is a recognized environmental condition. ATC recommends a limited subsurface investigation in this area.

- The facility contained a paint storage room. The room housed approximately 40 55-gallon drums that were located on a recessed floor that acted as secondary containment. Pitting of the concrete floor was noted in the paint storage room.

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2.0 PHYSICAL SITE DESCRIPTION

On December 8, 1999, a visual inspection and walk-through of the site was conducted by Ms. Debra B. Gehm, ATC Environmental Scientist and Mr. Christopher Bishop, ATC Project Manager. This inspection included an examination of the site and a reconnaissance of surrounding properties. Mr. George Kalil, Patrick Paint General Manager, accompanied ATC during the visual inspection of the site.

2.1 General Site Conditions

2.1.1 Physical Site Description

The project site is located on the southwest side of Elkhart, Indiana. The site is found within the Elkhart, Indiana 7.5 Minute Topographic Quadrangle map and is a part of the southeast quarter of Section 7, Township 37 North, Range 5 East. A site vicinity map and site plan are provided in Appendix A. Photographic documentation is provided in Appendix B. Records of verbal communication are provided in Appendix C

Patrick Paint consists of one single-story facility constructed of brick and concrete block on a steel frame. The original facility was reportedly constructed in the 1890's; however, the facility underwent multiple remodeling and addition phases. The Patrick Paint facilities primary operations are electrostatic spray-painting of aluminum parts for the mobile home and recreational vehicle industry. Currently, the facility consists of approximately 90,000 square feet under roof.

The facility is divided into four primary areas: the paint process area, the chemical storage area, material storage area and office space. The paint process begins with aluminum pieces being hung on hooks which area attached to a mechanical conveyer. The aluminum is then sent through a spray bath followed by a spray rinse cycle. Next the aluminum is cleaned and

scuffed using an acid spray and sent through a second water rinse cycle. After the aluminum is cleaned and scuffed it is sent through a pretreatment process, followed by a drying process. Once these steps area complete the aluminum is sent through two paint cycles followed by an oven curing process.

The electrostatic paint process utilizes caustics and acids which are stored in 55-gallon drums which are located north of the paint room. Beyond the drum storage area to the north are material storage and a maintenance shop. The maintenance shop contains three oxygen/acetylene torches, tools, parts, drill presses, etc.

The electrostatic paint process produces hazardous waste. The liquid waste is containerized in 55-gallon drums. The solid waste is containerized in 300-gallon plastic lined cardboard boxes. These materials are located in a roped off area north of the paint room. The materials are stored on a concrete slab and appeared to be properly labeled and in good condition. The hazardous waste storage containers were not placed in secondary containment.

The facility contained a paint storage room. The room housed approximately 40 55-gallon drums that were located on a recessed floor that acted as secondary containment. The room appeared to be well ventilated. Pitting of the concrete floor was noted in the paint storage room.

Patrick Paint contained one flammable storage trailer, which contained a slotted floor serving as secondary containment, ventilation and fire protection system. Drums stored in the trailer appeared to be in good condition. ATC did not note any staining or foul odors in the storage trailer.

Two small office areas are located in the Patrick Paint facility. The first is located on the south side of the facility and the second is located in a mezzanine in the central region of the facility. ATC noted general office equipment including desks, computers, etc. in the office areas.

The exterior of Patrick paint contained approximately 25 empty drums Reportedly, these drums are waiting to be disposed. A portable liquid propane cage containing approximately ten portable units was located in this area. In addition, ATC noted various metal debris on the southwest portion of the site.

One depression containing two pipe discharges was located on the west/southwest side of the facility. The pipes' origin is unknown. In addition, ATC noted remnants of historic building foundations on the west/southwest side of the facility. Ground cover in this area included sparse vegetation and moss. Vegetation around the facility appeared to be stressed, however, based on the climate and historic demolition disturbance at the site, the source of the stressed vegetation was not apparent.

2.1.2 Site Geology

The site topography is generally level. The Elkhart, Indiana Quadrangle Topographic Map (USGS, 1961, photo revised 1981, Figure 1) indicates the ground surface has an elevation of approximately 755 above mean sea level (MSL). Regionally the ground surface slopes to the northwest in the project area.

Infiltration and minor sheet flow drain the unpaved areas of the site. Storm drains divert rainwater from the paved areas of the property. No evidence of streams or creeks draining the site were noted. The St. Joseph River is located approximately one-quarter mile northwest and flows generally from east to west in the study area. Runoff from the site appears to eventually flow into the St. Joseph River.

The U.S. Department of Agriculture Soil Survey of Elkhart County classifies the soil at the site as Oshtemo loamy sand. The Oshtemo Series consists of "deep, somewhat excessively drained, coarse-textured soils. These soils are on outwash plains along the main streams of the

country and on knolls and ridges of the uplands" (Kirschner and McCarter, 1974). These soils have a moderately rapid permeability.

The Atherton Formation undifferentiated outwash forms the unconsolidated material below the Site. The loam till has a thickness of approximately 150 feet.

Devonian age Ellsworth Shale forms the bedrock below the Site. The surface of the bedrock has an elevation of approximately 605 feet above MSL. Regionally the bedrock surface slopes to the northwest in the study area.

Regional groundwater flow direction is generally influenced by major hydrogeologic features such as a river or lake. Surface and/or bedrock topography may also influence regional groundwater flow direction. The available hydrogeologic information indicates that local groundwater flow is northwest. Regional groundwater flow is considered to be northwest toward the St. Joseph River. Local geologic features may cause local groundwater flow direction to differ from the regional flow direction. Local hydraulic gradient at the project Site is interpreted based on a review of the USGS Topographic Quadrangle. Estimated groundwater levels and/or flow direction(s) may vary due to seasonal fluctuations in precipitation, local usage demands, geology, underground structures, or dewatering operations. A complete hydrogeologic investigation would be necessary to determine actual groundwater flow direction.

040-701-2640

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

November 5, 1992

Mr. Phil Starkey
Patrick Industries, Inc.
5020 Lincolnway East, P.O. Box 1330
Mishawaka, IN 46546

Re: Visual Site Inspection
ILC Products Company
Elkhart, Indiana
IND 005 470 521

Dear Mr. Starkey:

As indicated in the letter of introduction sent to you on January 3, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

Printed on Recycled Paper

City of Elkhart
Air Quality Assessment

Final Report
December 5, 2007

Industrial Safety and Environmental Services, Inc.
30723 Old US Highway 20
Elkhart, Indiana 46514

ISES
Industrial Safety and Environmental Services

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ISES
Industrial Safety and Environmental Services

"We put you in compliance"

30723 Old US Highway 20, Elkhart IN 46514 • Phone (574) 674-8357 • Fax (574) 674-6166 • ises@goises.com

FOREWARD

Industrial Safety and Environmental Services, Inc. (ISES) was contracted by the City of Elkhart to make an assessment of odor issues in the area around the Sturgis Iron & Metal, Inc. (SIM) Mega Shredder. ISES conducted a survey of area residents to establish their concerns regarding odor and dust (along with noise and vibration, which were the subject of a concurrent, but separate, assessment). ISES used the survey responses to establish the geographic areas for testing, and to determine what substances in the atmosphere to test. Accredited laboratories furnished analyses of air samples. The results of analyses were compared against Federal and State regulations, and against Elkhart City statutes to determine whether any regulation or statute was violated. This report includes the methodology of sampling, the results of laboratory analyses and recommendations for mitigating the negative impact on the local atmosphere by the Mega Shredder.

Tris O. Gour
Principal Senior Scientist
Industrial Safety and Environmental Services, Inc.

Kathy Norris
Senior Industrial Hygienist
Industrial Safety and Environmental Services, Inc.

Randy Martin
Director of Engineering Services
Industrial Safety and Environmental Services, Inc.

EXECUTIVE SUMMARY

ISES conducted atmospheric testing and obtained the following results:

Volatile Organic Compounds – sampling was conducted to determine the presence of Volatile Organic Compounds (VOCs) in the area around the Mega Shredder, and to determine whether the Mega Shredder was a source of VOCs (volatile toxics). Results showed that VOC levels in the area atmosphere are very low, and that the Mega Shredder does not contribute VOCs to the atmosphere.

Elemental Carbon - (diesel particulate) sampling was conducted. Analytical results were below laboratory detection limits, despite the influence of Norfolk and Southern diesel locomotives on the neighborhood's atmosphere. This testing was conducted to address survey responses indicating the presence of "greasy" or "oily" or "gas station" odors.

Total Metals – sampling was conducted to address residents' concerns regarding "metallic" odors and/or "metal taste in mouth." Results showed that only trace amounts of metals were present.

Suspended particulate – simultaneous tests showed that a location downwind from the Mega Shredder has 73% more particulate in the atmosphere than a location upwind. 326 IAC, Article 6, Rule 4, Section 2 states, in part:

> Sec. 2. A source or sources generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:
>
> (1) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations
>
> (2) The fugitive dust is comprised of fifty percent (50%) or more respirable[1] dust, then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:
>
> $$PR = (1.5 \pm N) P$$
>
> Where N = Fraction of fugitive dust that is respirable dust;
> PR = allowable percentage increase in dust concentration above background; and
> P = no value greater than sixty-seven percent (67%).
>
> (3) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.
>
> (4) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section.

[1] Defined by 326 IAC 1-2 as 8μg or less in diameter. No test exists for measuring 8μg-diameter particulate.

Upwind of the shredder, the concentration of particulate was 81µg/m^3 (micrograms per cubic meter); downwind, the concentration was 140µg/m^3. In addition to representing an increase greater than 67% of the upwind concentration, the downwind result is more than 50µg/m^3 greater than upwind; this violates both 326 IAC 6-4-2(1) and (3).

On several occasions during the course of this study, ISES personnel directly observed particulate (and some larger debris) crossing the SIM property line. Similar sightings have been noted by area residents. Each sighting would constitute a violation of 326 IAC 6-4-2(4), unless the observation is refuted by a test such as the one run by ISES.

With particulate emissions from the SIM site documented by observation and measurement, we infer that the site is in violation of Elkhart Code 151.081(G)(4), which states:

> *No emission of toxic or noxious matter[2], which is injurious to human health, comfort or enjoyment of life and property or to animal and plant life shall be permitted. Where such emissions could be produced as a result of an accident or equipment malfunction, adequate safeguards considered suitable for safe operation in the industry involved shall be taken.*

Visible particulate and debris (as observed and measured by ISES) emitting from the SIM site have been determined to be "noxious matter" as defined by Elkhart Code 151.011(B). The site is in violation of 151.011(B). While toxics are present in the atmosphere of the neighborhood (in concentrations less than those typically found in residential buildings), no evidence was found in this study which would point to the SIM site as a source of toxics.

Total and Respirable Particulate – sampling was conducted at various points, based on survey complaints of the accumulation of particulate indoors and outdoors. Results showed that particulate and respirable (very fine) dust were present. The presence of dust in atmospheric samples suggests that a buildup of dust on outdoor surfaces could occur.

We anticipate that any reduction in Suspended Particulate Matter achieved by SIM action will result in a proportional decrease in finer particulate (i.e., "respirable dust").

---

[2] Elkhart Code 151 011(B), *Definitions*:
Noxious Matter. fumes, dust or other material that is offensive to human senses, especially sight and smell.
Toxics. Those pollutants or combinations of pollutants, including disease-causing agents, which, after discharge and upon exposure, ingestion, inhalation or assimilation into any organism, either directly from the environment or indirectly by ingestion through the food chains, will on the basis of information available to the Planning and Zoning Staff, cause death, disease, behavioral abnormalities, cancer, genetic mutations, physiological malfuntions (including malfunctions in reproduction) or physical deformations in such organisms or their offspring.

RECOMMENDATIONS

ISES observed that most particulate became airborne as a result of material handling (loading and unloading the mega shredder) and vehicular traffic on unpaved (or dirt-covered) areas, rather than directly from the mega shredder. We recognize the significant effort SIM made prior to our ambient air monitoring, cleaning and wetting paved surfaces. In addition to SIM's recent improvements, we recommend the following:

1. wetting materials as they are placed on the shredder intake conveyer; and
2. enclosing conveyors as much as possible (in particular, conveyors transporting shredded materials); and
3. paving all routes used by trucks and other mobile equipment.

We also recommend that additional monitoring for Suspended Particulate Matter[3] be conducted as SIM moves toward compliance with 326 IAC 6-4-2.

[3] The High Volume Method of 40 CFR 50, Appendix B should be employed for this monitoring.

AIR QUALITY ASSESSMENT

TEST METHODS
&
REPORT OF FINDINGS

A. Volatile Organic Compounds (VOCs)

On August 27th, August 28th, and September 12th, 2007, Industrial Safety and Environmental Services, Inc. (ISES) conducted monitoring for Volatile Organic Compounds (VOCs) in the neighborhood surrounding the Sturgis Iron & Metal (SIM) Mega Shredder. Sampling locations were chosen based on responses received while conducting the door-to-door surveys in July 2007.

Tests: EPA Method TO-15

ISES utilized a 6.0 liter Summa Canister for the collection of VOCs. Each canister was placed at a designated sampling location based on weather conditions and wind direction. On each sampling date, one canister was placed upwind of the Mega Shredder, and one downwind to determine the contribution of contaminants coming from the Mega Shredder.

After preparation of sampler per the Method, the valve was opened and sampling initiated. At the completion of sampling, each canister was prepared per the laboratory method, and shipped for analysis.

Sampling was conducted over approximately a 24-hour period, with ISES staff conducting hourly checks of the gauge to record canister pressure. ISES staff also obtained direct bi-hourly area temperature, carbon dioxide, carbon monoxide and relative humidity readings with the use of a Q-Trak T8851 hand held analyzer.

An equivalent to Environmental Protection Agency (EPA) Compendium Method TO-15 was used by LA Testing for analysis of samples collected. This method utilizes a gas chromatograph coupled with a mass spectrometer (GC/MS). According to the EPA, this method is more definitive than single specific detectors or a multidetector arrangement as it reduces the chance for misidentification and further enhances correct identification and quantification of VOCs.

Sampling Results

At least 23 VOCs were detected between all of the sampling locations, but only the 12 with the greatest concentrations are shown in the graphs below. The results in their entirety are included in the appendices to this report.

On August 27, 2007, sampling was conducted at 13th and Wolf, upwind of the site and the ISES site (located northeast of the Mega Shredder), downwind of the site. The results are:

August 27: 8-hour Time Weighted Average (TWA) was calculated for each result. The 8-hour TWA for each result is shown here

Constituent	13th and Wolf (upwind) (mg/m^3)	ISES Site (mg/m^3)
1,2,4-Trimethylbenzene	0.0418	0 0339
1,4-Dichlorobenzene	0.0300	0 0409
2-Butanone	0 0442	0.0530
Acetone	0.1140	0.1377
Benzene	0.0032	0.0054
Ethanol	0.1658	0.1696
Ethyl Benzene	0.0156	0.0130
Isopropyl Alcohol	0.0135	0.0197
n-Heptane	0.0365	0.0491
Propylene	0.0671	0.0894
Toluene	0.1506	0.0527
Xylene (ortho)	0.0521	0.0156
Xylene (para and meta)	0.0521	0.0434

No meaningful statistical difference exists between upwind and downwind results. It would appear that the SIM Mega Shredder has minimal, if any, impact on the presence of VOCs in the atmosphere. The presence of Toluene and Xylene are in greater concentration upwind of the site, which means that the Mega Shredder is not contributing to the emission of these two VOCs.

On August 28, 2007, sampling was conducted at 1002 Hubbard, upwind of the site and at 1429 West Indiana Ave., downwind of the site. The results are:

August 28: 8-hour Time Weighted Average (TWA) was calculated for each result. The 8-hour TWA is shown here

Constituent	1002 Hubbard (upwind) (mg/m^3)	1429 West Indiana Ave. (downwind) (mg/m^3)
1,2,4-Trimethylbenzene	0.0388	0.0418
1,4-Dichlorobenzene	0.0547	0.0300
2-Butanone	0.0884	0.0648
Acetone	0.2612	0.1639
Benzene	0 0048	0.0032
Ethanol	0.1507	0.1131
Ethyl Benzene	0 0152	0.0156
Isopropyl Alcohol	0.0199	0.0128
n-Heptane	0.0778	0.0381
Propylene	0.1531	0.0585
Toluene	0.0565	0.6776
Xylene (ortho)	0.0191	0.0191
Xylene (para and meta)	0 0521	0.0521

Again, the majority of VOC emissions were detected upwind of the Mega Shredder. Toluene, however, appeared in a larger concentration downwind of the site. It is unlikely that the SIM or its Mega Shredder would use toluene, so it is likely that toluene was emitted from another industrial source.

On September 12, 2007, sampling was conducted at 1332 West Indiana Ave., upwind of the site and at 1113 Cleveland, downwind of the site. The results are:

September 12: 8-hour Time Weighted Average (TWA) was calculated for each result. The 8-hour TWA is shown here

Constituent	1332 West Indiana Ave. (upwind) (mg/m^3)	1113 Cleveland (downwind) (mg/m^3)
1,2,4-Trimethylbenzene	0.0285	0.0133
1,4-Dichlorobenzene	0.0186	0.0042
2-Butanone	0.0153	0.0141
Acetone	0.0546	0.0451
Benzene	0.0032	0 0032
Ethanol	0 0452	0.0490
Ethyl Benzene	0.0048	0.0052
Isopropyl Alcohol	0.0147	0.0000
n-Heptane	0.0000	0.0102
Propylene	0.0258	0.0139
Toluene	0.1807	0.0489
Xylene (ortho)	0 0096	0.0061
Xylene (para and meta)	0.0191	0.0148

Yet again, the majority of VOC emissions were detected upwind of the Mega Shredder, and toluene again appeared in a larger concentration upwind of the site. A more likely source of toluene would be an industrial location near West Indiana Avenue.

Background Information: VOCs

VOCs are organic chemical compounds containing one or more carbon atoms that have high enough vapor pressures under normal conditions to significantly vaporize and enter the atmosphere. There are thousands of compounds that meet these criteria, and a variety of methods from which they enter the atmosphere. VOC emissions may result from natural sources as well as man-made sources, and although the natural sources are more abundant, it is the man-made sources that are the greatest contributors to air quality problems.

Fossil-fuel consuming internal combustion engines are a major contributor to the emissions of VOCs into the air. Vented storage of gasoline, oil and other volatile chemicals also contribute VOCs. Industrial processes and the use of consumer and commercial solvents can also play a role. Many VOC-containing products used by industry and/or burned in internal combustion engines have very distinct (and sometimes unpleasant) odors, which can contribute to localized odor nuisance issues. On the positive side, operators of industrial processes are regulated to control their VOC emissions, and numerous strides have been made in the transportation industry to help reduce the impact of fossil fuel use to limit environmental and health risks.

The health effects of VOCs can vary greatly depending on the organic compound and its concentration. Eye and respiratory tract irritation, nose and throat irritation, headaches and dizziness are among the immediate symptoms some people encounter soon after exposure to some organics.

Individuals with pre-existing respiratory disorders such as asthma and persons with heightened sensitivity to chemicals may be more susceptible to the effects of VOC exposure than others.

B. Elemental Carbon (Diesel Particulate)

On July 31st and August 27th, 2007, ISES conducted monitoring for Elemental Carbon in the neighborhood surrounding the SIM Mega Shredder. Sampling locations were chosen based on responses received while conducting the door-to-door surveys in July 2007.

Tests: NIOSH Method 5040

The diesel particulate samples were collected using a single source sampling medium (a 37mm quartz filter). An equivalent to the NIOSH 5040 method was used by LA Testing for analysis of the collected samples. For sample collection, the MSA sampling pumps were calibrated, on-site, to draw a known volume of air through a 37mm quartz filter. Sample duration was approximately 85 minutes.

Sampling Results

Diesel particulate results were below laboratory detection limits. Results beginning with "<" identify that the sample collected was below laboratory detection limits. The results in their entirety are included in the appendices to this report.

Results of NIOSH 5040 Sampling for Elemental Carbon (Diesel Particulate)

Sample Collection Date	Sample Number	Address	Results in mg/m^3
7/31/07	73101	RV/ISES Site	<0.014
7/31/07	73103	1010 Cleveland	<0.015
7/31/07	73104	1204 Garfield	<0.014
7/31/07	73105	1229 Harrison	<0.015
7/31/07	73102	1324 Blaine	<0.014
8/27/07	82702	1829 Oakland	<0.012
8/27/07	82705	1429 Indiana	<0.016
8/27/07	82704	1024 Hubbard	<0.015
8/27/07	82703	1006 Wolf	<0.012
8/27/07	82701	901 Cleveland	<0.014

Background Information: Elemental Carbon (Diesel Particulate)

It is not uncommon to find diesel exhaust contaminants in the air in both rural and urban environments. The sight and smell of diesel exhaust is objectionable to many people. Many sources generate diesel exhaust such as buses, semi-trucks, trains, electrical generators and earth moving equipment. Type of fuel, how the engine is used, emission control equipment, maintenance and operation of the engine all determine the chemical compounds released.

Particles and gases from diesel exhaust are suspended in the air, so exposure to this pollutant occurs whenever a person breathes air that contains these substances. The commonness of diesel-powered engines makes it almost impossible to avoid exposure to diesel exhaust or its byproducts.

Diesel exhaust exposure can have immediate health effects, causing irritation to the nose, eyes, throat and lungs, headaches, nausea and light-headedness. Studies have shown that diesel exhaust particles made individuals with allergies more susceptible to the materials to which they are allergic, such as pollen and dust. Exposure to diesel exhaust can also cause inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the intensity or frequency of asthma attacks.

C. Metals and Total Weight Gain (Particulate)

On August 17th, 2007, ISES conducted monitoring for Metals and Total Weight Gain (Particulate) in the neighborhood surrounding SIM. Sampling locations were chosen based on responses received while conducting the door-to-door surveys in July 2007.

Tests: OSHA Method ID 121/OSHA ID 125G

ISES utilized MSA sampling pumps, calibrated on-site, to draw a known volume of air through a 37mm 0.8 micron Matched Weight Mixed Cellulose Ester Filter for the collection of Particulate (Total Weight Gain). Each pump was placed at a designated sampling location based on results from the door to door surveys, weather conditions and wind direction. On the sampling date, one MSA sampling pump was placed outside a residence (addresses are located in the results section in this portion of the report).

Sampling was conducted over approximately an 8-hour period, with ISES staff conducting hourly checks of pumps and media.

An equivalent to Occupational Safety and Health Administration (OSHA) Method ID 121 and 125 for Metal and Metalloid Particulates was used by NATLSCO Testing for analysis of samples collected. In OSHA Method 121, samples are desorbed or digested using water extractions or mineral acid digestions. Elemental analysis of the prepared sample solutions is performed by atomic absorption or emission spectroscopy. With OSHA Method 125G, filters are digested with nitric acid, sulfuric acid and hydrogen peroxide. Dissolution of the elements is facilitated by addition of hydrochloric acid. Analysis is performed using Inductively Coupled Argon Plasma-Atomic Emission Spectroscopy (ICAP-AES).

Sampling Results

Analysis was requested for 14 metals. Only five of these metals were present in levels above laboratory detection limits (as shown below). Laboratory results in their entirety are included in the appendices to this report.

Results of Methods 121/125G Sampling
Results preceeded by "less than" (<) indicate that the concentration was below laboratory detection limits.

Location	Sample Number	Chromium (mg/m^3)	Iron (mg/m^3)	Nickel (mg/m^3)	Total Dust (mg/m^3)	Zinc (mg/m^3)
1207 Wolf	27034121	<0.00011	0.0037	<0.00011	<0.11	0.00032
1025 Cleveland	27034133	<0.00018	0.006	<0.00018	0.26	0.0007
1728 10th Street	27034112	<0.0001	0.0029	<0.0001	<0.1	0.00031
1002 Hubbard	27034115	<0.000098	0.002	<0.000098	<0.098	0.000098
1324 Blaine	27034151	0.00012	0.0029	0.00024	<0.12	0.00012

There is no OSHA Permissible Exposure Limit (PEL) for iron. Material Safety Data Sheets refer to "airborne" risk coming from exposure to "ferric oxide fume". Despite concerns expressed by residents, overexposure to ferric oxide (aka "rouge dust" or "hermatite dust) seems improbable. (The OSHA Permissible Exposure Limit for iron oxide dust, "respirable fraction," is 10 mg/m^3).

D. Total Particulate

On September 13th and 18th, 2007, ISES conducted monitoring for total particulate in the neighborhood surrounding the SIM Mega Shredder. Sampling locations were chosen based on responses received while conducting the door-to-door surveys in July 2007.

Test: NIOSH 0500

Total particulate samples were collected using a single source sampling medium (i.e. one 5.0 micron polyvinyl chloride filter, 2-piece cassette, preweighed filter). An equivalent to the NIOSH 0500 method was used by NATLSCO for analysis of the collected samples. For sample collection, the MSA sampling pumps were calibrated, on-site, to draw a known volume of air through a 5.0 micron polyvinyl chloride filter. Sample duration was approximately 480 minutes.

Sampling Results

As stated above, total particulate can be generated from a multitude of sources. Based on visual observations by ISES personnel of materials handling processes (loading and unloading the shredder creating dust clouds and airborne debris which cross SIM property lines), SIM is a contributor to the generation of total particulate in the surrounding neighborhood. The highest total particulate result was 0.42 milligrams per cubic meter (mg/m^3). Results beginning with "<" identify that the sample collected was below laboratory detection limits. Results in their entirety are included in the appendices to this report.

Results of NIOSH 0500 Sampling

Sample Collection Date	Sample Number	Address	Results in mg/m^3
9/13/07	27031530	1307 Hubbard	<0.011
9/13/07	27031525	1110 Blaine	0.02
9/13/07	27031526	1032 Hubbard	<0.0093
9/13/07	27031522	1713 Oakland	0.041
9/13/07	27031516	1824 Oakland	0.019
9/18/07	27031527	1300 Leonard	0.047
9/18/07	27031529	1033 Wolf	<0.0093
9/18/07	27031514	1010 Cleveland	0.046
9/18/07	27031535	1204 Garfield	0.42

Background Information: Particulate

Particulate matter is a term used to describe solid or liquid particles emitted into the air. Particulates vary in size; some are large enough to be seen while others are so small that they can only be detected with an electron microscope.

Particulate matter can be generated from many sources. Processes or activities which involve burning of materials or any dust generating activities are sources of particulate.

We can generate particulate from just working in our yards. Weed wackers, lawn mowers and leaf blowers all generate particulate in addition to our vehicles.

Individuals most susceptible are individuals with asthma, influenza, lung, heart, or cardiovascular disease, children and the elderly.

E. Respirable Particulate

On September 13th and 18th, 2007, ISES conducted monitoring for respirable particulate[4] in the neighborhood surrounding the SIM Mega Shredder. Sampling locations were chosen based on responses received while conducting the door-to-door surveys in July 2007.

Test: NIOSH 0600

Respirable particulate samples were collected using a single source sampling medium (i.e. one 5.0 micron polyvinyl chloride filter, 2-piece cassette, preweighed filter) attached to a cyclone. An equivalent to the NIOSH 0600 method was used by NATLSCO for analysis of the collected samples. For sample collection, the MSA sampling pumps were calibrated, on-site, to draw a known volume of air through a 5.0 micron polyvinyl chloride filter. Sample duration was approximately 480 minutes. Similar to NIOSH 0500, determining the respirable fraction of dust is a gravimetric procedure requiring special pre-weighed PVC filters. OSHA and others have developed threshold values ranging from 2 to 5 mg/m^3.

Sampling Results

The highest respirable particulate result was 0.05 mg/m^3. Results in their entirety are included in the appendices to this report.

Results of NIOSH 0600 Sampling

Sample Collection Date	Sample Number	Address	Results in mg/m^3
9/13/07	27031532	1204 Garfield	0.050
9/13/07	27031520	1113 Cleveland	0.025
9/18/07	27031517	1712 Oakland	0.025
9/18/07	27031534	1226 Wolf	0.036

[4] Respirable particulate matter is a term used to describe airborne material which is capable of penetrating to the gas-exchange region of the lungs and is capable of being drawn deep into the lungs when you take a breath

F. Suspended Particulate Matter

ISES conducted ambient air monitoring for Suspended Particulate Matter on October 15, 2007 at positions upwind and downwind (herein described as "South" and "North," respectively) of the Mega Shredder as follows:

TEST: 40 CFR 50, Appendix B - Reference Method for the Determination of Suspended Particulate Matter in the Atmosphere (High-Volume Method)

Test Start: 2 06PM

Test End: 3:06PM

Wind Direction: Southeast

Wind Speed: 6.9 mph

Uniformity of air flow: *North sampler was powered by a portable generator during testing and* post-calibration of air flow. South sampler was powered by 110v AC from the local power grid during testing and post-calibration of air flow.

Calibration method: both samplers were equipped with exhaust pipes. Differential pressures during calibration were measured, and air flows calculated per modified EPA Method 2 (Velocity - S-type Pitot). Moisture was calculated based on relative humidity readings taken at the time of testing and at the time of calibration, and air flow was adjusted to dry standard conditions as specified in the High-Volume Method.

Test Filters: numbered, pre-weighed filters supplied by Chester Laboratory (analytical laboratory) were used during testing, then removed from the samplers, packaged and shipped to the lab.

Sampling Results

Results of High Volume Testing

Position	Site	Particle Size	Tare Wt. (g)	Gross Wt. (g)	Net Wt. (µg)	Volume (m^3)	Concentration[5] (ug/m^3)
Downwind (North)	Elliston	TSP	4.6421	4.6595	17,400	124.2	**140**
Upwind (South)	1216 Wolf St	TSP	4.6305	4.6419	11,400	141.2	**81**

The increase in suspended particulate from upwind of the Mega Shredder to downwind of the Mega Shredder (expressed in micrograms per cubic meter) is 59. This is a 72.8% increase over the baseline of 81 ug/m^3 established upwind.

[5] The US EPA National Ambient Air Quality Standard (NAAQS) for particulate matter 10 microns in diameter ("PM10") is 150 ug/m^3 over 24 hours. The results shown here are for TSP, and do not reflect the fraction of PM10 present in the samples

326 Indiana Administrative Code, Article 6 (Particulate Rules)
Rule 4. Fugitive Dust Emissions

326 IAC 6-4-1 Applicability of rule
Sec. 1. This rule (326 IAC 6-4) shall apply to all sources of fugitive dust. For the purposes of this rule (326 IAC 6-4), "fugitive dust" means the generation of particulate matter to the extent that some portion of the material escapes beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located.

326 IAC 6-4-2 Emission limitations
Sec. 2. A source or sources generating fugitive dust shall be in violation of this rule (326 IAC 6-4) if any of the following criteria are violated:

(1) A source or combination of sources which cause to exist fugitive dust concentrations greater than sixty-seven percent (67%) in excess of ambient upwind concentrations as determined by the following formula:

$$P = \frac{100\,(R - U)}{U}$$

P = Percentage increase
R = Number of particles of fugitive dust measured at downward receptor site
U = Number of particles of fugitive dust measured at upwind or background site

(2) The fugitive dust is comprised of fifty percent (50%) or more respirable dust[6], then the percent increase of dust concentration in subdivision (1) of this section shall be modified as follows:

$$P_R = (1.5 \pm N)\,P$$

Where N = Fraction of fugitive dust that is respirable dust;
P_R = allowable percentage increase in dust concentration above background; and
P = no value greater than sixty-seven percent (67%).

(3) The ground level ambient air concentrations exceed fifty (50) micrograms per cubic meter above background concentrations for a sixty (60) minute period.

(4) If fugitive dust is visible crossing the boundary or property line of a source. This subdivision may be refuted by factual data expressed in subdivisions (1), (2) or (3) of this section.

Description of the High-Volume Method (excerpted from 40 CFR 50, Appendix B)

This method provides a measurement of the mass concentration of total suspended particulate matter (TSP) in ambient air. An air sampler, properly located at the measurement site, draws a measured quantity of ambient air into a covered housing and through a filter during a 1-hr (nominal) sampling period. The sampler flow rate and the geometry of the shelter favor the collection of particles up to 25–50 µm (aerodynamic diameter), depending on wind speed and direction. The filters used are specified to have a minimum collection efficiency of 99 percent for 0 3 µm (DOP) particles

The filter is weighed (after moisture equilibration) before and after use to determine the net weight (mass) gain. The total volume of air sampled, corrected to EPA standard conditions (25 °C, 760 mm Hg [101 kPa]), is determined from the measured flow rate and the sampling time. The concentration of total suspended particulate matter in the ambient air is computed as the mass of

[6] In Indiana, *"respirable dust" is defined as 8 microns in diameter (or less) No test exists for particulate equal to or less* than 8 microns in diameter.

collected particles divided by the volume of air sampled, corrected to standard conditions, and is expressed in micrograms per standard cubic meter (µg/std m^3).

The approximate concentration range of the method is 2 to 750 µg/std m^3 . The upper limit is determined by the point at which the sampler can no longer maintain the specified flow rate due to the increased pressure drop of the loaded filter. This point is affected by particle size distribution, moisture content of the collected particles, and variability from filter to filter, among other things. The lower limit is determined by the sensitivity of the balance and by inherent sources of error.

At wind speeds between 1 3 and 4.5 m/sec (3 and 10 mph), the high-volume air sampler has been found to collect particles up to 25 to 50 µm, depending on wind speed and direction. For the filter specified in Section 7.1 of the method, there is effectively no lower limit on the particle size collected

PARAMETERS OF STUDY

This study was performed in a manner consistent with standards typically applied to a statement of professional opinion. The study and resulting report are based partially on information obtained from others.

The information contained in this report was developed from information available at the time the report was compiled. Industrial Safety and Environmental Services, Inc. assumes no liability for financial or other losses or subsequent damage caused by or related to any use of this document.

LIST OF APPENDICES

Results of Laboratory Analyses

- Volatile Organic Data Analysis Summary (VOCs)
- Elemental Carbon on Quartz Filters (Diesel Particulate)
- Metals and Total Weight Gain (Particulate)
- Total Particulate/Respirable Particulate
- Suspended Particulate Matter

Sampling Documentation

- Sampling Media Sheets
- Mega Shredder Log Sheets

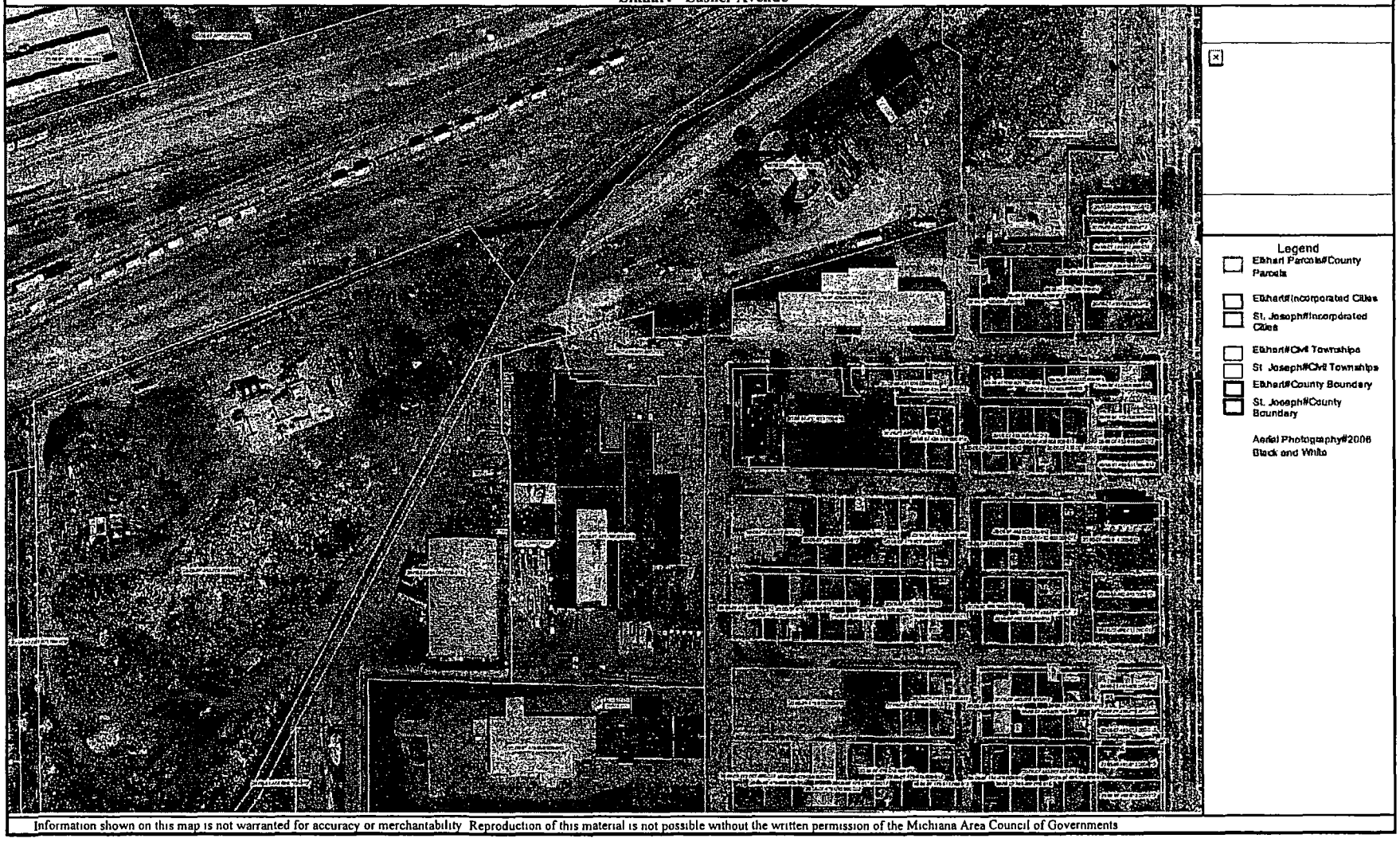
Drawings

- Sampling Locations by Sampling Session
- Survey Area

Regulatory Agency Database Search Results

Neighborhood Survey Forms

Elkhart - Lusher Avenue



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DELL ENGINEERING, INC.
Civil Engineering • Environmental Consulting

3352 128th Avenue, Holland, Michigan 49424-9263
Phone: 616-399-3500 FAX: 616-399-3777
Muskegon Heights, Michigan - Branch Office

August 21, 1996

Sturgis Iron & Metal Company
70675 Centerville Road
Sturgis, Michigan 49091

Attn: Mr. Ralph Levin

Re: Former Godfrey Marine Property
1703 South 13th Street, Elkhart, Indiana

Dear Mr. Levin:

This correspondence provides a summary of recent environmental investigation performed at the above-referenced site. The investigation included installation and sampling of additional groundwater monitoring wells and performance of a limited Phase I Environmental Site Assessment (ESA). This work was performed in accordance with our proposal dated July 12, 1996, in order to minimize potential future cleanup liability.

GROUNDWATER SAMPLING

In order to more completely define the extent of groundwater contamination previously identified at MW-3 and MW-5, two (2) additional monitoring wells (MW-6 and MW-7) were installed and sampled on July 24, 1996. Locations of new and existing monitoring wells are illustrated in Figure 1 (Attachment A).

WELL INSTALLATION & SAMPLING

Monitoring wells were installed with a hydraulically-driven drill rig by Great Lakes Drilling Company under the supervision of Dell. Split-barrel core samples were collected from each boring for volatile organic compound (VOC) screening and geologic logging. VOC screening was performed with a 10.2 eV photoionization detector (PID) calibrated to a benzene equivalent gas.

Boring logs and well construction details are included in Appendix B. Soil encountered in the borings consisted primarily of brown and tan, fine sand. No significant VOC levels were noted in soils screened with the PID (see boring logs). Groundwater was encountered in the borings at a depth of approximately 14.5 feet below the ground surface. Wells were constructed of 2-inch diameter PVC materials with 5-foot screens set in the upper 5 feet of the aquifer. Upon installation, wells were developed until a minimum of suspended fines were noted in the development water.

Static water levels (SWLs) were measured in new and existing monitoring wells to allow calculation of the groundwater flow direction. The new wells were surveyed to determine their relative top-of-casing elevations and allowed to stabilize for approximately 1 hour prior to SWL measurement. July 1996 SWLs were generally consistent with prior measurements, indicating a northerly groundwater flow gradient (see Figure 1 Attachment A).

SAMPLE COLLECTION & ANALYSIS

Groundwater samples were collected using disposable polyethylene bailers upon purging three (3) well volumes of groundwater from each well. A new bailer and bailer twine were used for

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purging and sample collection at each well. Following sample collection, containers were labeled, chain-of-custody documents completed, and the samples were placed in an iced cooler chest and transported to Western Michigan Environmental Services, Inc. for laboratory analysis. Samples were analyzed for MDNR Scan 1 & 2 VOCs and vinyl chloride (indicative of common industrial degreasers and solvents). Analytical procedures and techniques were conducted in accordance with the following documents:

- U.S. EPA, *Methods for Chemical Analysis of Water and Wastes*, EPA-600
- U.S. EPA, *Test Methods for Evaluating Solid Wastes*, SW-846, November 1986, as amended.

Analytical methodologies and detection limits were consistent with Michigan regulatory guidance per ERD Operational Memorandum #6, Revision 4, September 13, 1995. The Michigan regulatory programs are felt to be more thorough and restrictive than those in Indiana. Thus, the protocol followed is likely to be consistent with Indiana requirements, if any exist.

SAMPLING RESULTS

Results for the sampling of the new wells and prior sampling at existing wells are summarized in Table 1 (Attachment C). The laboratory report for the new well sampling is included in Attachment D. The results for MW-6 indicate trichloroethene (TCE), the only detected parameter, is present at a concentration of 19 μg/l which exceeds Indiana's residential drinking water criterion of 5 μg/l. The results for MW-7 indicate 1,1,1-trichloroethane, the only detected parameter, is present at a concentration of 2.3 μg/l which meets Indiana's residential drinking water criterion of 1,290 μg/l.

An evaluation of results at new and existing wells indicates low-level chlorinated VOC impact across the site. Residential drinking water exceedences (for TCE only) have been noted only in wells MW-3, MW-5 and MW-6 at the western portion of the site. The TCE levels at MW-3 and MW-6 (at the southern property boundary) suggest on-site migration of contaminants from an upgradient source. The increase in TCE levels from MW-6 to MW-5 suggests an on-site source may be contributing to the measured groundwater contamination. However, it is possible that all of the detected TCE on site, including at MW-5, originated from an upgradient, off-site source.

LIMITED PHASE I ESA

In order to evaluate potential sources of environmental contamination due to former operations on-site and operations in the vicinity of the site, a limited Phase I ESA was performed. The scope of the limited Phase I ESA consisted of a regulatory agency records search/file review and a historical records review (i.e., aerial photographs, Polk's Directories, Sanborn Fire Insurance Maps, and tax records).

REGULATORY REVIEW

A July 15, 1996, report prepared by Environmental Data Resources, Inc. (EDR) provides a summary of Federal and State "Standard Environmental Record Sources" within the "approximate minimum search distance" (distance from the subject site) of "practically reviewable" information as defined by ASTM Standard E 1527-94. A copy of this report is included as Attachment E.

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As indicated in the EDR report, information was obtained "from a variety of public sources" (typically the Indiana Department of Environmental Management [IDEM], State Fire Marshal, and U.S. EPA) and placed on a computer database. The lists are reviewed to determine potential areas of environmental concern in the vicinity of the investigated site. Dell makes no warranty or guarantee of the accuracy or completeness of the database information prepared by EDR, nor the lists prepared by the State or Federal agencies.

EDR did not identify the former Godfrey Marine site on any of the databases searched, indicating no "reasonably ascertainable" governmental records of environmental contamination are available. Several nearby sites of potential environmental contamination were identified by EDR (see Attachment E).

In order to evaluate whether nearby, upgradient sites identified by EDR pose the threat of impacting the investigated site, available records were requested from the IDEM Office of Environmental Response. The IDEM provided underground storage tank (UST) information for several sites on Lusher Street and Oakland Avenue (located south of the site). UST removal/closure reports were provided for Gano Plywood and Patrick Industries (both located adjacent to the site's southern property boundary). The limited sampling conducted during closure activities at these sites did not indicate significant releases of petroleum products.

No information regarding investigation of potential sources of chlorinated VOCs or TCE in groundwater was provided by the IDEM. EDR identification of the site "Lusher Street Groundwater Contamination" suggests a regional upgradient groundwater plume (Lusher Street is located approximately ¼ mile south of the site). However, based on the lack of IDEM records for this site, significant investigation in the vicinity of the site does not appear to have been conducted to date.

HISTORICAL RECORDS REVIEW

Aerial Photographs

Aerial photographs were used to identify obvious outside historic operations or items of potential environmental concern. Aerial photographs for the site were available from 1993 and 1977 (see Attachment F). Both aerials depict the existing structure at the south side of the site and the (former) main building at the eastern portion of the site. Several unknown items and apparent roll-off boxes are stored at the eastern portion of the site in the 1993 aerial. No obvious items of environmental concern are apparent in either aerial photograph.

Polk's Directories

Polk's Directories were reviewed at the Elkhart Public Library to evaluate the ownership history of the site. The first documented occupant at 1703 S. 13th Street was the "Sidway Mercantile Co.," which was listed from 1910 through 1917. "Godfrey Conveyor" was listed as the next site occupant from 1924 through 1980. "San Pan Boats (Godfrey Marine Division)" was listed as an additional occupant in the 1960 listing. The site was listed as "vacant" in the 1985 to 1994 directories.

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Sanborn Maps

Sanborn fire insurance maps for the site were obtained through EDR Sanborn, Inc. to evaluate historic property conditions and items of potential environmental concern. Sanborn maps for the site were available from 1910 through 1968 (see Attachment G). The site was not shown on a 1901 map, suggesting is was not likely developed at this time.

The maps depict the site as occupied by Sidway Mercantile Co. in 1910 and 1917, and by Godfrey Conveyor in 1927, 1950, and 1968. Building descriptions are included on the maps (see Attachment G). Sidway operations are described in the maps to consist of manufacture of collapsible go-carts. Godfrey operations are described to consist of manufacture of metal conveyors. Items of potential environmental concern noted in the maps include an apparent oil warehouse at the eastern portion of the site in the 1910 map, and several references to painting operations (which likely involved hazardous substance use). In order to determine whether environmental contamination is present due to potential releases from these areas, follow-up investigation would be necessary.

Tax Records

Tax records for the site were obtained from the Elkhart City Assessor's office. Tax records were reviewed for any references to items of potential environmental concern. Available tax records indicate the site buildings were first constructed in the early 1900s for "light manufacturing" use. No items of environmental concern were noted.

CONCLUSIONS

Groundwater sampling described above indicates probable migration of contaminants from an off-site, upgradient source; however, a potential on-site source may be contributing to the contamination. The compound TCE is a common industrial degreaser used since the 1940s and its use and subsequent release to the environment on the subject property is possible, given the history of metal fabrication on the property by Godfrey Conveyor. However, Sidway Mercantile Co. (manufacturer of go-karts), Sidway Topliff Co. (manufacturer of metal toys), Klingler Manufacturing Co. (manufacturer of machine shop products) and the Industrial Lamp Co. all operated immediately upgradient of the site. These companies also may have used TCE in their manufacturing processes, which included plating and polishing operations.

The limited Phase I ESA work described above indicates several sites of environmental contamination are located upgradient from the investigated site; however, no records were available documenting impact to the investigated site. Historical information described above indicates the site was apparently first developed in the early 1900s for Sidway Mercantile. Sidway apparently utilized the site for collapsible go-cart manufacture until approximately 1920, at which time Godfrey Conveyor began metal conveyor manufacturing operations. The site was apparently utilized by Godfrey until the early 1980s and has been vacant since this time. Items of potential environmental concern include a former oil warehouse and likely hazardous substance use during former manufacturing operations (Sanborn maps indicate painting operations were conducted on the property by Godfrey).

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If Sturgis Iron & Metal Company (SI&M) purchases the site, it could be held liable for contamination identified on the site in the event that enforcement actions are pursued by state or federal regulatory agencies. The Phase I work described above affords SI&M a limited "due diligence" defense to liability for potential contamination not identified by Dell's groundwater studies and the sources described above. However, interviews with persons familiar with former operations, as required by ASTM Standard E 1527-94, would be required to establish more of a defense. A soil sampling investigation could be implemented in an attempt to determine potential on-site sources of TCE contamination.

The conclusions in this report are based upon the scope stated within and are intended to function as indicators of potential environmental impact from readily determined historical or current activities conducted at or in close proximity of the subject site. The results and conclusions of this study do not insure, warrant, or represent that there are not additional environmental issues which might be discovered if a more thorough evaluation were undertaken.

If you have any questions regarding the information described above or would like additional investigation performed at the site, please do not hesitate to contact Lee Dell or one of the undersigned at 616-399-3500.

Sincerely,

DELL ENGINEERING, INC.

Chad Weber (TPO)

Chad A. Weber
Staff Engineer

Thomas P. O'Connell

Thomas P. O'Connell, P.E.
Project Manager

CAW:cw
(960142/ck:TPO/LRD)

Attachments (7)

cc: John Dresser - Dresser Law Office
File

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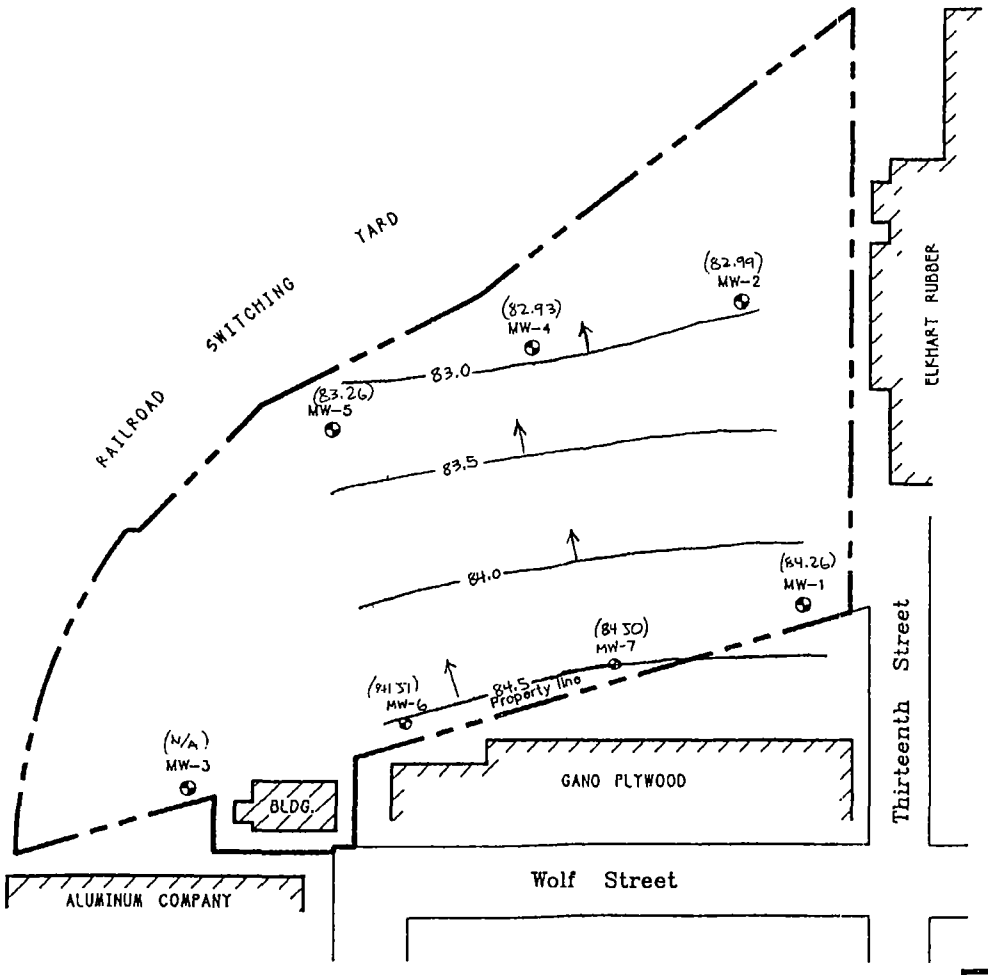
ATTACHMENT A

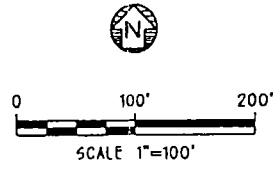
• FIGURE 1 •

SITE PLAN

PIEZOMETRIC SURFACE CONTOURS

JULY 24, 1996





LEGEND

- MONITORING WELL LOCATION
- (84.26) STATIC WATER ELEVATION
- —84.5— PIEZOMETRIC SURFACE CONTOUR

STURGIS IRON & METAL ELKHART, INDIANA	NOVEMBER 1991
	910858
de DELL ENGINEERING, INC. Environmental Consultants HOLLAND, MICHIGAN 49424	FIGURE 1

<9101006> 910858SP 12/05/91
REVISIONS ARE TO BE MADE ON THE CADD MASTER FILE ONLY

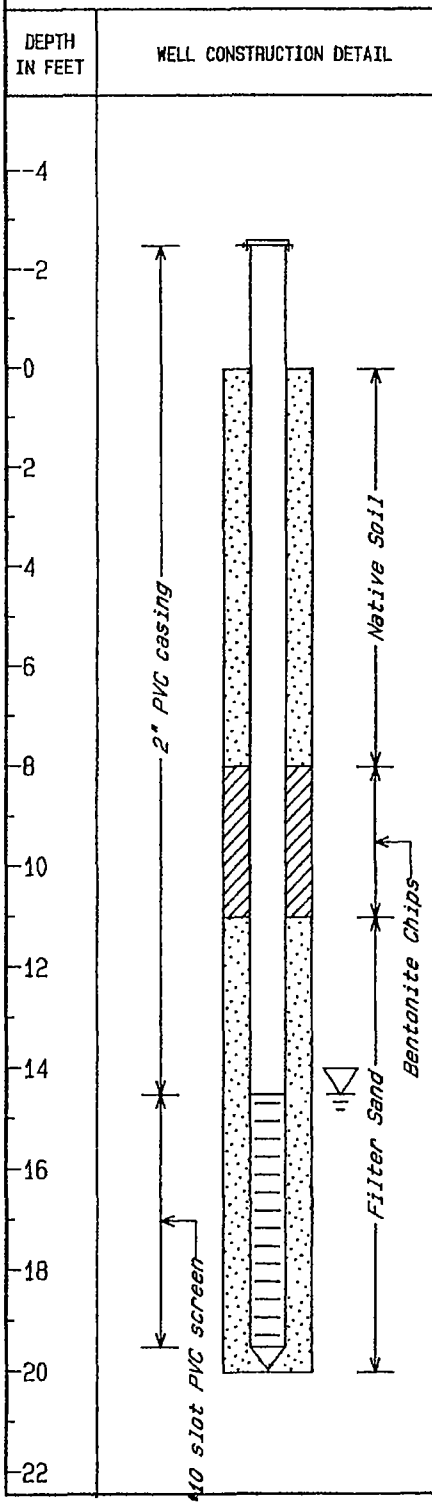
ATTACHMENT B

• BORING LOGS •

DELL ENGINEERING, INC.

Project STURGIS IRON & METAL
Location ELKHART, INDIANA
Job No. 960142
Geologist/Engineer CAW
Drill Agency GREAT LAKES DRILLING CO.

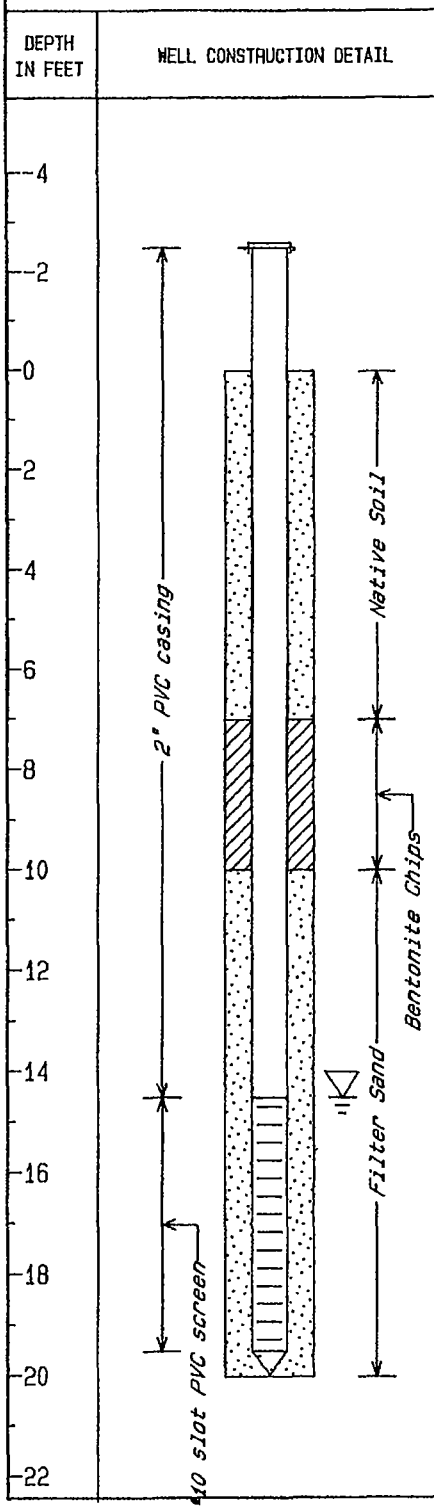
Hole/Well No. MW-6
Diameter of Drill Hole 8 inches
Total Depth of Hole 20 feet
Date Started 7/24/96
Date Completed 7/24/96



DELL ENGINEERING, INC.

Project STURGIS IRON & METAL
Location ELKHART, INDIANA
Job No. 960142
Geologist/Engineer CAW
Drill Agency GREAT LAKES DRILLING CO.

Hole/Well No. MW-7
Diameter of Drill Hole 8 inches
Total Depth of Hole 20 feet
Date Started 7/24/96
Date Completed 7/24/96



ATTACHMENT C

• TABLE 1 •

DELL ENGINEERING, INC.

TABLE 1

GROUNDWATER ANALYTICAL RESULTS

Former Godfrey Marine Site
1703 South 13th Street
Elkhart, Indiana

PARAMETER	Tier II Cleanup Criteria[1]		MW-1			MW-2			MW-3			MW-4			MW-5			MW-6	MW-7
	Residential	Non-Residential	11/91	1/93	2/96	11/91	1/93	2/96	11/91	1/93	2/96	11/91	1/93	2/96	11/91	1/93	2/96	7/96	7/96
Chloroform	100	469	2.6	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*	*
Trichloroethene	5.0	260	*	*	*	1.2	1.5	2.9	9.0	8.0	6.7	2.2	2.7	*	49	61	72	19	*
1,1,1-Trichloroethane	1,290	9,200	*	*	*	*	3.7	*	*	*	*	*	*	*	*	*	*	*	2.3

NOTES:

- Concentrations reported in µg/l (parts per billion)
- [1] Indiana Department of Environmental Management (IDEM) Tier II groundwater cleanup criteria.
- * = Below detection limit
- Shaded values exceed IDEM Tier II residential cleanup criteria.
- MDNR Scan 1 & 2 parameters not listed were not present at detectable concentrations.

ATTACHMENT D

• LABORATORY REPORT •

WESTERN MICHIGAN
ENVIRONMENTAL SERVICES, INC.

3352 128th Avenue, Holland, Michigan 49424-9263
Phone: 616-399-6070 FAX 616-399-6185

RECEIVED
JUL 31 1996
DELL
ENGINEERING

CLIENT: Dell Engineering, Inc.
3352 128th Avenue
Holland, Michigan 49424

Attn: Chad Weber
Re: Sturgis Iron & Metal (960142)

DATE: July 31, 1996

ANALYSIS OF: Groundwater Samples

REPORTED BY: Robert K. Zahray, Laboratory Manager

DATE RECEIVED: Received from client on July 25, 1996.

Sample ID: MW-6 Lab ID: 9607228-01 Collected: 07/24/96

TEST	RESULT	UNITS	ANALYZED	BY	METHOD	MDL
MDNR Scans 1&2					EPA 8260	
Bromodichloromethane	BDL	µg/L	07/25/96	DAH		1.0
Bromoform	BDL	µg/L	07/25/96	DAH		1.0
Carbon Tetrachloride	BDL	µg/L	07/25/96	DAH		1.0
Chlorobenzene	BDL	µg/L	07/25/96	DAH		1.0
Chlorodibromomethane	BDL	µg/L	07/25/96	DAH		1.0
Chloroform	BDL	µg/L	07/25/96	DAH		1.0
1,1-dichloroethane	BDL	µg/L	07/25/96	DAH		1.0
1,2-dichloroethane	BDL	µg/L	07/25/96	DAH		1.0
1,1-dichloroethene	BDL	µg/L	07/25/96	DAH		1.0
cis-1,2-dichloroethene	BDL	µg/L	07/25/96	DAH		1.0
trans-1,2-dichloroethene	BDL	µg/L	07/25/96	DAH		1.0
1,2-dichloropropane	BDL	µg/L	07/25/96	DAH		1.0
1,3-dichloropropene	BDL	µg/L	07/25/96	DAH		1.0
Methylene Chloride	BDL	µg/L	07/25/96	DAH		5.0
1,1,2,2-Tetrachloroethane	BDL	µg/L	07/25/96	DAH		1.0
Tetrachloroethene	BDL	µg/L	07/25/96	DAH		1.0
1,1,1-trichloroethane	BDL	µg/L	07/25/96	DAH		1.0
1,1,2-trichloroethane	BDL	µg/L	07/25/96	DAH		1.0
Trichloroethene	19	µg/L	07/25/96	DAH		1.0
Benzene	BDL	µg/L	07/25/96	DAH		1.0
Ethyl Benzene	BDL	µg/L	07/25/96	DAH		1.0
Toluene	BDL	µg/L	07/25/96	DAH		1.0
Styrene	BDL	µg/L	07/25/96	DAH		1.0
Xylene Isomers	BDL	µg/L	07/25/96	DAH		1.0
Vinyl Chloride	BDL	µg/L	07/25/96	DAH	EPA 8260	1.0

BDL = Below Detection Limit
MDL = Method Detection Limit

Printed on Recycled Paper

ample ID: MW-7 Lab ID: 9607228-02 Collected: 07/24/96

TEST	RESULT	UNITS	ANALYZED	BY	METHOD	MDL
MDNR Scans 1&2					EPA 8260	
Bromodichloromethane	BDL	µg/L	07/25/96	DAH		1.0
Bromoform	BDL	µg/L	07/25/96	DAH		1.0
Carbon Tetrachloride	BDL	µg/L	07/25/96	DAH		1.0
Chlorobenzene	BDL	µg/L	07/25/96	DAH		1.0
Chlorodibromomethane	BDL	µg/L	07/25/96	DAH		1.0
Chloroform	BDL	µg/L	07/25/96	DAH		1.0
1,1-dichloroethane	BDL	µg/L	07/25/96	DAH		1.0
1,2-dichloroethane	BDL	µg/L	07/25/96	DAH		1.0
1,1-dichloroethene	BDL	µg/L	07/25/96	DAH		1.0
cis-1,2-dichloroethene	BDL	µg/L	07/25/96	DAH		1.0
trans-1,2-dichloroethene	BDL	µg/L	07/25/96	DAH		1.0
1,2-dichloropropane	BDL	µg/L	07/25/96	DAH		1.0
1,3-dichloropropene	BDL	µg/L	07/25/96	DAH		1.0
Methylene Chloride	BDL	µg/L	07/25/96	DAH		5.0
1,1,2,2-Tetrachloroethane	BDL	µg/L	07/25/96	DAH		1.0
Tetrachloroethene	BDL	µg/L	07/25/96	DAH		1.0
1,1,1-trichloroethane	2.3	µg/L	07/25/96	DAH		1.0
1,1,2-trichloroethane	BDL	µg/L	07/25/96	DAH		1.0
Trichloroethene	BDL	µg/L	07/25/96	DAH		1.0
Benzene	BDL	µg/L	07/25/96	DAH		1.0
Ethyl Benzene	BDL	µg/L	07/25/96	DAH		1.0
Toluene	BDL	µg/L	07/25/96	DAH		1.0
Styrene	BDL	µg/L	07/25/96	DAH		1.0
Xylene Isomers	BDL	µg/L	07/25/96	DAH		1.0
Vinyl Chloride	BDL	µg/L	07/25/96	DAH	EPA 8260	1.0

BDL = Below Detection Limit
MDL = Method Detection Limit

Printed on Recycled Paper

ımple ID: Trip Blank Lab ID: 9607228-03 Collected: 07/22/96

TEST	RESULT	UNITS	ANALYZED	BY	METHOD	MDL
MDNR Scans 1&2					EPA 8260	
Bromodichloromethane	BDL	µg/L	07/25/96	DAH		1.0
Bromoform	BDL	µg/L	07/25/96	DAH		1.0
Carbon Tetrachloride	BDL	µg/L	07/25/96	DAH		1.0
Chlorobenzene	BDL	µg/L	07/25/96	DAH		1.0
Chlorodibromomethane	BDL	µg/L	07/25/96	DAH		1.0
Chloroform	BDL	µg/L	07/25/96	DAH		1.0
1,1-dichloroethane	BDL	µg/L	07/25/96	DAH		1.0
1,2-dichloroethane	BDL	µg/L	07/25/96	DAH		1.0
1,1-dichloroethene	BDL	µg/L	07/25/96	DAH		1.0
cis-1,2-dichloroethene	BDL	µg/L	07/25/96	DAH		1.0
trans-1,2-dichloroethene	BDL	µg/L	07/25/96	DAH		1.0
1,2-dichloropropane	BDL	µg/L	07/25/96	DAH		1.0
1,3-dichloropropene	BDL	µg/L	07/25/96	DAH		1.0
Methylene Chloride	BDL	µg/L	07/25/96	DAH		5.0
1,1,2,2-Tetrachloroethane	BDL	µg/L	07/25/96	DAH		1.0
Tetrachloroethene	BDL	µg/L	07/25/96	DAH		1.0
1,1,1-trichloroethane	BDL	µg/L	07/25/96	DAH		1.0
1,1,2-trichloroethane	BDL	µg/L	07/25/96	DAH		1.0
Trichloroethene	BDL	µg/L	07/25/96	DAH		1.0
Benzene	BDL	µg/L	07/25/96	DAH		1.0
Ethyl Benzene	BDL	µg/L	07/25/96	DAH		1.0
Toluene	BDL	µg/L	07/25/96	DAH		1.0
Styrene	BDL	µg/L	07/25/96	DAH		1.0
Xylene Isomers	BDL	µg/L	07/25/96	DAH		1.0
Vinyl Chloride	BDL	µg/L	07/25/96	DAH	EPA 8260	1.0

BDL = Below Detection Limit
MDL = Method Detection Limit

Printed on Recycled Paper

WESTERN MICHIGAN
ENVIRONMENTAL SERVICES, INC.

3352 128th Avenue Holland, Michigan 49424-9263
Phone: 616-399-6070 FAX 616-399-6185

CLIENT SAMPLE -- CHAIN OF CUSTODY FORM

Project Name:	Sturgis Iron & Metal / Elkhart (960142)
Name of Sampler:	Chad Weber

ESI # 9607228	Date	Time	Sample Matrix	Sample ID	No. Cont.	Analyses Requested
-1	7-24-96	1310	GW	MW-6	3	Scan 1,2 + Vinyl Chloride
-2	"	1320	GW	MW-7	3	" "

Remarks: Samples transported w/ iced cooler, stored in Dell cooler overnight.

Samples Relinquished By:	Samples Transported By:	Samples Received By:
Affiliation: Dell	Affiliation: Dell	Affiliation: WMES
Date: 7-25-96 Time: 905	Date: 7-24-96 Time: 1700	Date: 7/25/96 Time: 0905

SAMPLE MATRIX CODES:

W = Water
GW = Groundwater
SW = Surface Water
WW = Wastewater
WST = Waste
S = Soil
O = Other

ATTACHMENT E

• EDR REPORT •

The EDR-Radius Map
with GeoCheck™

Former Godfrey Marine
1703 S. 13th Street
Elkhart, IN 46516

Inquiry Number: 126060.1s

July 15, 1996

Environmental Data Resources, Inc.

Creators of Toxicheck/®

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

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APPENDICES

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EPA Waste Codes	A2
Government Records Searched / Data Currency Tracking Addendum	A3

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

Disclaimer

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc. (EDR). The search met the specific requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-94, or custom distances requested by the user.

The address of the subject property for which the search was intended is:

1703 S. 13TH STREET
ELKHART, IN 46516

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the subject property or within the ASTM E 1527-94 search radius around the subject property for the following Databases:

NPL:	National Priority List
Delisted NPL:	NPL Deletions
RCRIS-TSD:	Resource Conservation and Recovery Information System
State Haz. Waste:	List of Hazardous Waste Response Sites Scored Using the Indiana Scoring Model
CERCLIS:	Comprehensive Environmental Response, Compensation, and Liability Information System
CERC-NFRAP:	Comprehensive Environmental Response, Compensation, and Liability Information System
CORRACTS:	Corrective Action Report
SWF/LF:	Permitted Solid Waste Facilities
RAATS:	RCRA Administrative Action Tracking System
RCRIS-LQG:	Resource Conservation and Recovery Information System
HMIRS:	Hazardous Materials Information Reporting System
PADS:	PCB Activity Database System
ERNS:	Emergency Response Notification System
FINDS:	Facility Index System
TRIS:	Toxic Chemical Release Inventory System
NPL Liens:	Federal Superfund Liens
TSCA:	Toxic Substances Control Act
MLTS:	Material Licensing Tracking System
RODS:	Records Of Decision
CONSENT:	Superfund (CERCLA) Consent Decrees
IN Spills:	Spills Incidents
Coal Gas:	Former Manufactured gas (Coal Gas) Sites.

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

Search Results:

Search results for the subject property and the search radius, are listed below.

Subject Property:

The subject property was not listed in any of the databases searched by EDR.

EXECUTIVE SUMMARY

Surrounding Properties:

Sites with an elevation equal to or higher than the subject property are in the left hand column; those with a lower elevation are in the right hand column. Page numbers refer to the EDR Radius Map report where detailed data on individual sites may be reviewed.

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

LUST: N/A.

A review of the LUST list, as provided by EDR, and dated 07/01/1994 has revealed that there are 3 LUST sites within approximately 0 5 Miles of the subject property.

Equal/Higher Elevation	Page/Map ID	Lower Elevation	Page/Map ID
GANO PLYWOOD INC	*8/1*		
YODER MART	9/4		
MILITARY MAINTENANCE SHOP 12	9/5		

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 comes from the Department of Environmental Management's Indiana Registered Underground Storage Tanks list.

A review of the UST list, as provided by EDR, and dated 10/10/1995 has revealed that there is 1 UST site within approximately 0 25 Miles of the subject property

Equal/Higher Elevation	Page/Map ID	Lower Elevation	Page/Map ID
GANO PLYWOOD INC	*8/1*		

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 02/29/1996 has revealed that there are 2 RCRIS-SQG sites within approximately 0.25 Miles of the subject property.

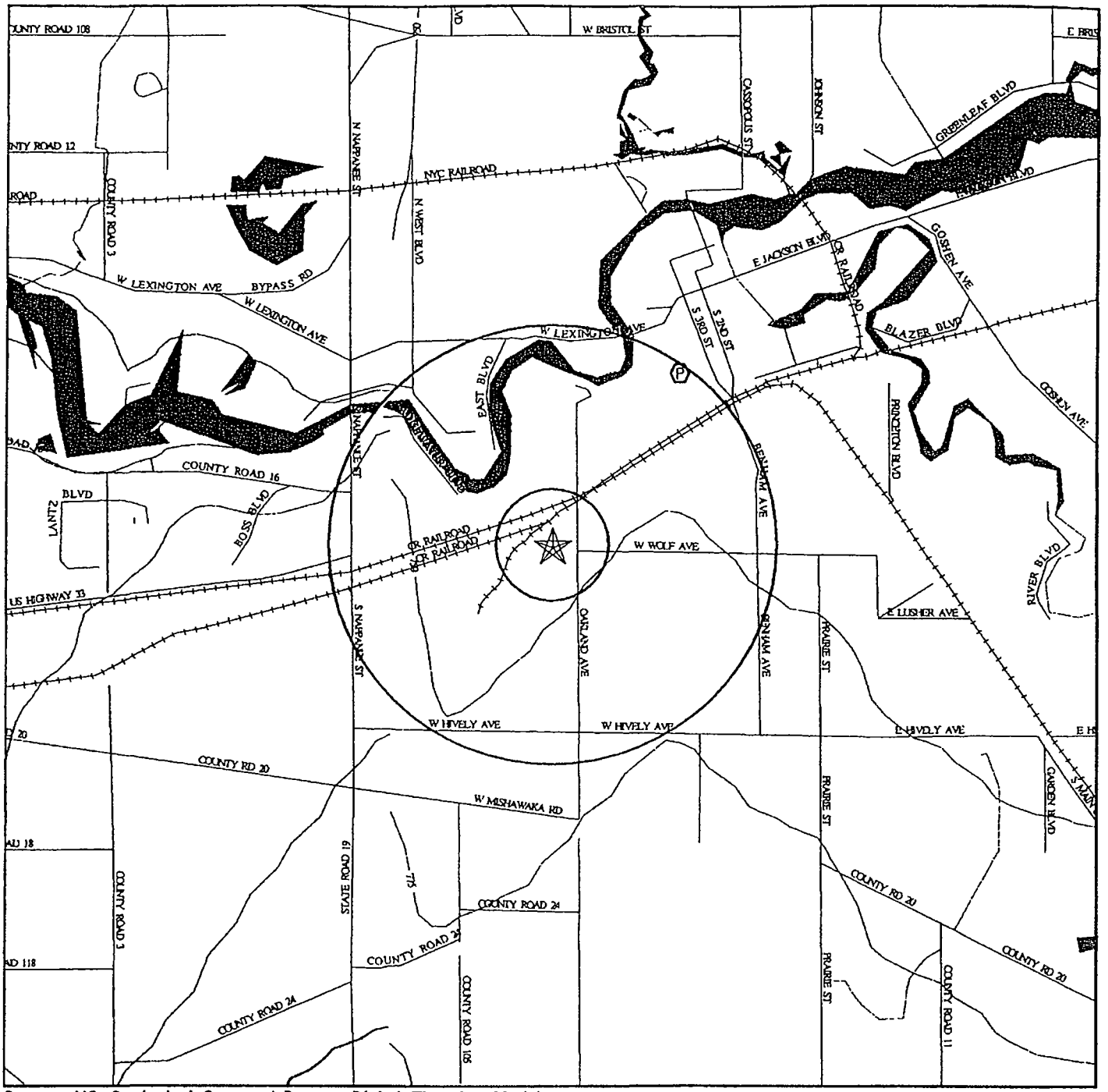
Equal/Higher Elevation	Page/Map ID	Lower Elevation	Page/Map ID
SELDOM REST BODY SHOP	8/A2		
SELDOM REST BODY SHOP	*9/A3*		

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped

Site Name	Database(s)
YODER OIL	RCRIS-SQG,FINDS,RCRIS-TSD CORRACTS,CERC-NFRAP,UST
HERMASEAL CO	RCRIS-LQG,RCRIS-TSD,CORRACTS
GEMEINHARDT	RCRIS-SQG,RCRIS-TSD
CTS CORP ELKHART PLASTICS DIV	FINDS,RCRIS-LQG,RCRIS-TSD CORRACTS,CERC-NFRAP
LUSHER AVENUE	State Haz. Waste
SYCAMORE STREET	CERCLIS,FINDS,State Haz. Waste
BELMONT-HURON STREETS	CERCLIS
WAGNER AVENUE SITE	CERCLIS,FINDS
LUSHER STREET GROUNDWATER CONTAMINATION	CERCLIS,FINDS
SUPERIOR STREET AREA	CERCLIS,FINDS
ELKHART SLUDGE FARM	CERCLIS,FINDS
NEW PARIS LF	SWF/LF
ELKHART COUNTY LF	SWF/LF
OAK RIDGE CEMETERY SFS	SWF/LF
SCHULT HOMES SFS	SWF/LF
EARTHMOVERS LANDFILL	SWF/LF
COUNTY ROAD 45 PIT C/D SITE	SWF/LF
ELKHART COUNTY LANDFILL (CR 7 LANDFILL)	SWF/LF
YODER SIX SPAN 76	LUST
AMERICAN TRAILER	LUST
UNITED UNIT # 6086	LUST
MDK OIL CO	LUST
CITY OF ELKHART	LUST
VARIOUS SITES	LUST
CONRAIL	LUST
VARIOUS SITES	LUST
MARATHON UNIT 2381	UST
JR FOOD MART/SIX SPAN	UST
INDIANA DEPT OF TRANSPORTATION	UST
BOCK INDUSTRIES INC	UST
DEL'S MARATHON SERVICE STATION	UST
FORMER SERVICE STATION	UST
PICKRELL'S FLORIST INC	UST
WYLAND MARINE	UST
GODFREY CONVEYOR CO INC	RCRIS-SQG,FINDS
S AND S BODY SHOP	RCRIS-SQG,FINDS
ELKHART PLATING CORP	RCRIS-LQG
GODFREY CONVEYOR CO INC	FINDS,RCRIS-LQG

TOPOGRAPHIC MAP - 126060.1s - Dell Engineering, Inc.



Source: US Geological Survey 1-Degree Digital Elevation Model
Compiled 09/15/92

0 1/4 1/2 1 2
Miles

N - Major Roads

N - Contour lines (25 foot interval unless otherwise shown)

N - Waterways

◎ - Earthquake epicenter, Richter 5 or greater.

(F)(S) - Closest well according to (F)ederal or (S)tate database in quadrant.

(P) - Closest public water supply well.

TARGET PROPERTY:	Former Godfrey Marine	CUSTOMER:	Dell Engineering, Inc.
ADDRESS:	1703 S. 13th Street	CONTACT:	Tom OConnell
CITY/STATE/ZIP:	Elkhart IN 46516	INQUIRY #:	126060.1s
LAT/LONG:	41.6711 / 85.9869	DATE:	July 15, 1996

GEOCHECK VERSION 2.1
SUMMARY

GEOLOGIC AGE IDENTIFICATION†

Geologic Code	M1
Era:	Paleozoic
System:	Mississippian
Series:	Osagean and Kinderhookian Series

ROCK STRATIGRAPHIC UNIT†

Category:	Stratified Sequence

GROUNDWATER FLOW INFORMATION

General Topographic Gradient.	General NW
General Hydrogeologic Gradient	no hydrogeologic data available.

Note: In a general way, the water table typically conforms to surface topography.‡

USGS TOPOGRAPHIC MAP ASSOCIATED WITH THIS SITE

Target Property:	2441085-F8 ELKHART, IN

FEDERAL DATABASE WELL INFORMATION

WELL QUADRANT	DISTANCE FROM TP	LITHOLOGY	DEPTH TO WATER TABLE

NO WELLS FOUND

STATE DATABASE WELL INFORMATION

WELL QUADRANT	DISTANCE FROM TP

NO WELLS FOUND

PUBLIC WATER SUPPLY SYSTEM INFORMATION (EPA-FRDS)

Searched by Nearest Well

NOTE: PWS System location is not always the same as well location.

PWS Name:	CHICKEN COOP OF INDIANA INC 2727 BENHAM AVE ELKHART, IN 46514
Location Relative to TP.	1/2 - 1 Mile North
Well currently has or has had major violation(s):	No

AREA RADON INFORMATION

Zip Code. 46516

Number of sites tested: 9

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	1 650 pCi/L	100%	0%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	5 156 pCi/L	56%	44%	0%

1 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)

‡ U S EPA Ground Water Handbook Vol 1 Ground Water and Contamination Office of Research and development EPA/625/6 90/016a Chapter 4 page 78 September 1990

OVERVIEW MAP - 126060.1s - Dell Engineering, Inc.

★ - Indicates TARGET PROPERTY.

▲ - Indicates sites at elevations higher than or equal to the target property.

◆ - Indicates sites at elevations lower than the target property.

- Coal Gasification Sites (if requested)

- National Priority List Sites

0 1/4 1/2 1

Miles

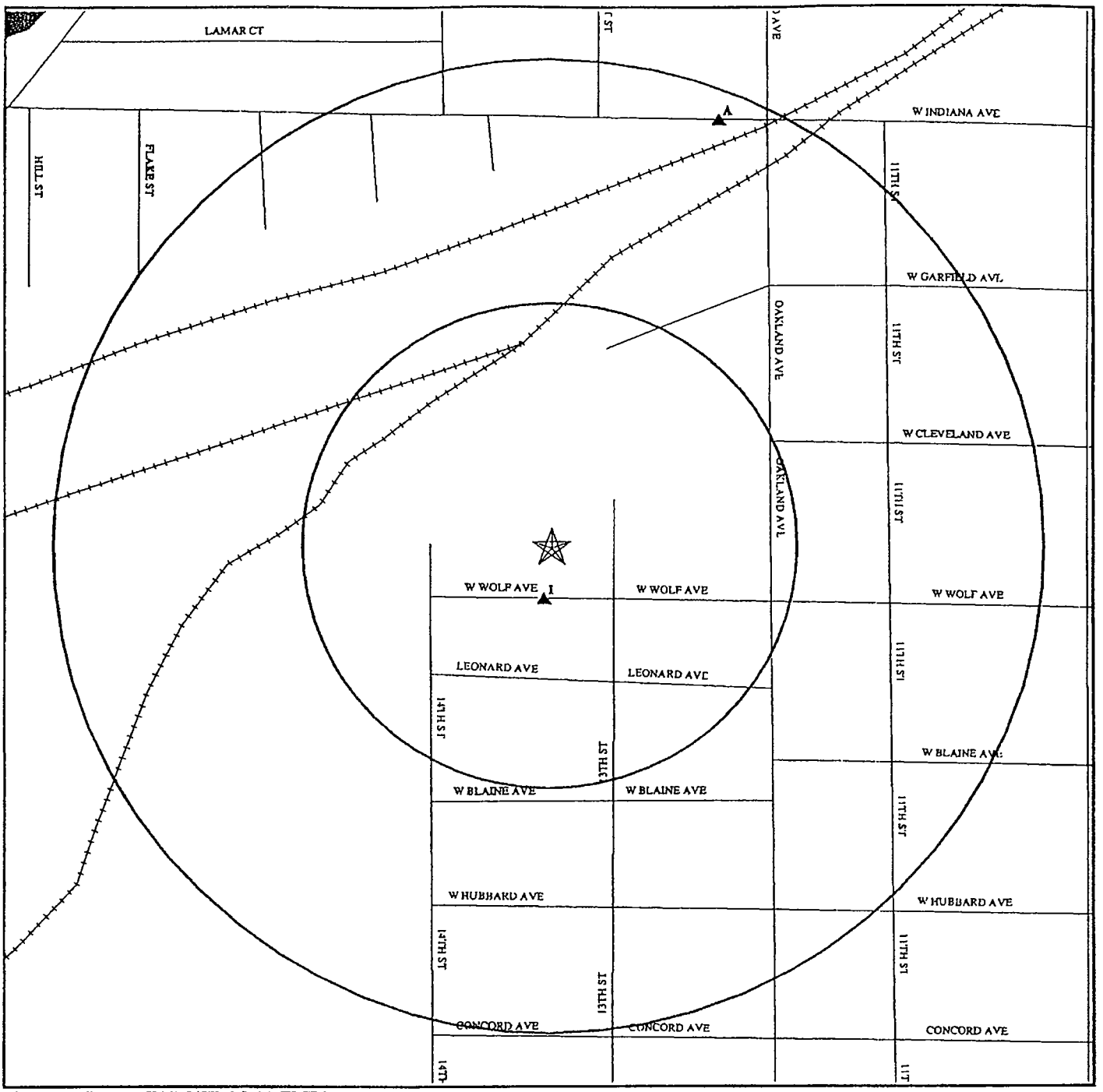
N

- Power transmission lines (USGS DLG, 1993)

- Oil & Gas pipelines (USGS DLG, 1993)

TARGET PROPERTY:	Former Godfrey Marine	CUSTOMER:	Dell Engineering, Inc.
ADDRESS:	1703 S. 13th Street	CONTACT:	Tom OConnell
CITY/STATE/ZIP:	Elkhart IN 46516	INQUIRY #:	126060.1s
LAT/LONG:	41.6711 / 85.9869	DATE:	July 15, 1996

DETAIL MAP - 126060.1s - Dell Engineering, Inc.



★ - Indicates TARGET PROPERTY.

▲ - Indicates sites at elevations higher than or equal to the target property.

◆ - Indicates sites at elevations lower than the target property.

- Coal Gasification Sites (if requested)

- Sensitive Receptors

- National Priority List Sites

0 1/8 1/4

Miles

- Power transmission lines (USGS DLG, 1993)

- Oil & Gas pipelines (USGS DLG, 1993)

TARGET PROPERTY:	Former Godfrey Marine	CUSTOMER:	Dell Engineering, Inc.
ADDRESS:	1703 S. 13th Street	CONTACT:	Tom OConnell
CITY/STATE/ZIP:	Elkhart IN 46516	INQUIRY #:	126060.1s
LAT/LONG:	41.6711 / 85.9869	DATE:	July 15, 1996

MAP FINDINGS SUMMARY SHOWING ALL SITES

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
NPL		1.000	0	0	0	0	NR	0
Delisted NPL		TP	NR	NR	NR	NR	NR	0
RCRIS-TSD		1.000	0	0	0	0	NR	0
State Haz. Waste		1.000	0	0	0	0	NR	0
CERCLIS		0.500	0	0	0	NR	NR	0
CERC-NFRAP		TP	NR	NR	NR	NR	NR	0
CORRACTS		1.000	0	0	0	0	NR	0
State Landfill		0.500	0	0	0	NR	NR	0
LUST		0.500	1	0	2	NR	NR	3
UST		0.250	1	0	NR	NR	NR	1
RAATS		TP	NR	NR	NR	NR	NR	0
RCRIS Sm. Quan. Gen		0.250	0	2	NR	NR	NR	2
RCRIS Lg Quan. Gen.		0.250	0	0	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
ERNS		TP	NR	NR	NR	NR	NR	0
FINDS		TP	NR	NR	NR	NR	NR	0
TRIS		TP	NR	NR	NR	NR	NR	0
NPL Liens		TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
IN Spills		TP	NR	NR	NR	NR	NR	0
ROD		1.000	0	0	0	0	NR	0
CONSENT		1.000	0	0	0	0	NR	0
Coal Gas		1.000	0	0	0	0	NR	0

TP = Target Property

NR = Not Requested at this Search Distance

* Sites may be listed in more than one database

MAP FINDINGS SUMMARY SHOWING
ONLY SITES HIGHER THAN OR THE SAME ELEVATION AS TP

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
NPL		1.000	0	0	0	0	NR	0
Delisted NPL		TP	NR	NR	NR	NR	NR	0
RCRIS-TSD		1.000	0	0	0	0	NR	0
State Haz Waste		1.000	0	0	0	0	NR	0
CERCLIS		0.500	0	0	0	NR	NR	0
CERC-NFRAP		TP	NR	NR	NR	NR	NR	0
CORRACTS		1.000	0	0	0	0	NR	0
State Landfill		0.500	0	0	0	NR	NR	0
LUST		0.500	1	0	2	NR	NR	3
UST		0.250	1	0	NR	NR	NR	1
RAATS		TP	NR	NR	NR	NR	NR	0
RCRIS Sm. Quan. Gen.		0.250	0	2	NR	NR	NR	2
RCRIS Lg Quan Gen		0.250	0	0	NR	NR	NR	0
HMIRS		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
ERNS		TP	NR	NR	NR	NR	NR	0
FINDS		TP	NR	NR	NR	NR	NR	0
TRIS		TP	NR	NR	NR	NR	NR	0
NPL Liens		TP	NR	NR	NR	NR	NR	0
TSCA		TP	NR	NR	NR	NR	NR	0
MLTS		TP	NR	NR	NR	NR	NR	0
IN Spills		TP	NR	NR	NR	NR	NR	0
ROD		1.000	0	0	0	0	NR	0
CONSENT		1.000	0	0	0	0	NR	0
Coal Gas		1.000	0	0	0	0	NR	0

TP = Target Property

NR = Not Requested at this Search Distance

* Sites may be listed in more than one database

MAP FINDINGS

Map ID Direction Distance Elevation	Site	Database(s)	EDR ID Number EPA ID Number

Coal Gas Site Search: No site was found in a search of Real Property Scan's ENVIROHAZ database.

1
South
< 1/8
Higher

GANO PLYWOOD INC
1334 W WOLF AVE
ELKHART, IN 46516

FINDS
UST
LUST

1000762618
IND985098615

Other Pertinent Environmental Activity Identified at Site
facility regulated by state environmental programs

LUST.

Facility ID.	002305	Site No ·	9008582
Responsible Staff.	XXX	Priority.	Low

UST

Facility ID.	002305	Total Tanks:	00
Form Status·	COMPLETE	Tank Number	01
Facility Contact:	MERV LUNG	Tank Status·	Perm Out of Use
Contact Tel ·	Not reported	Year Installed.	1975
Owner Name.	GANO PLYWOOD INC	Age	99
Owner Address:	1334 W WOLF AVENUE	Capacity	00550
City, State, Zip·	ELKHART, IN 46516	Material·	STEEL
Owner Tel	219-295-7136	Internal Prot :	CATHODIC PROT.
Owner Type	CURRENT	External Prot..	CATHODIC PROT
Owner Descr.:	PRIVATE/CORP.	Piping·	BARE STEEL
Invoice Date:	01-DEC-89	Piping Method.	Not Reported
Entry Date·	Not reported	Empty	YES
User ID.	Not reported	Substance:	GASOLINE
Revise Date	Not reported	Other Petroleum.	Not reported
Install Date:	Not reported	Haz Subst Descr.:	Not reported
Closure Date:	Not reported	Last Used·	01/90
Closure Status	Not Defined	Substance Removal.	00000
Last Used Date:	01-JAN-90		
Tank Features	NONE		

Facility ID.	002305	Total Tanks	00
Form Status:	COMPLETE	Tank Number·	02
Facility Contact:	MERV LUNG	Tank Status	Perm Out of Use
Contact Tel..	Not reported	Year Installed·	1975
Owner Name:	GANO PLYWOOD INC.	Age:	99
Owner Address:	1334 W. WOLF AVENUE	Capacity	01000
City, State, Zip	ELKHART, IN 46516	Material·	STEEL
Owner Tel.:	219-295-7136	Internal Prot.	CATHODIC PROT
Owner Type·	CURRENT	External Prot :	CATHODIC PROT.
Owner Descr.:	PRIVATE/CORP.	Piping:	BARE STEEL
Invoice Date.	01-DEC-89	Piping Method:	Not Reported
Entry Date·	Not reported	Empty	YES
User ID.	Not reported	Substance:	GASOLINE
Revise Date:	Not reported	Other Petroleum:	Not reported
Install Date:	Not reported	Haz Subst. Descr ·	Not reported
Closure Date.	Not reported	Last Used	01/90
Closure Status	Not Defined	Substance Removal.	00000
Last Used Date:	01-JAN-90		
Tank Features·	NONE		

A2
NNE
1/8-1/4
Higher

SELDOM REST BODY SHOP
1317 W INDIANA AVE
ELKHART, IN 46516

RCRIS-SQG

1000464300
IND025012329

MAP FINDINGS

Map ID / Direction / Distance / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number

SELDOM REST BODY SHOP (Continued) — 1000464300

There are 1 compliance/violation record(s) reported at this site

Evaluation	Date	Violations
OTHER EVALUATION	01-APR-86	YES

A3 NNE 1/8-1/4 Higher — SELDOM REST BODY SHOP, 1317 W INDIANA AVE, ELKHART, IN 46515 — RCRIS-SQG, FINDS — 1000124161, IND981779473

RCRIS.
Owner HAKES PHILIP M
(312) 555-1212
Contact: CONSTANCE MAHAN
(214) 647-4111

Waste	Quantity	Info Source	Waste	Quantity	Info Source
D001	00000 (N)	Notification	F005	00000 (N)	Notification

(P) = Pounds, (K) = Kilograms, (M) = Metric Tons, (T) = Tons, (N) = Not Reported

Other Pertinent Environmental Activity Identified at Site:
hazardous waste generator, transporter, treatment, storage or disposal facility (TSDFS)

4 NW 1/4-1/2 Higher — YODER MART, 1589 W FRANKLIN ST, ELKHART, IN 46516 — LUST — S101138709, N/A

LUST:
Facility ID: 009068 — Site No: 8912516
Responsible Staff: XXX — Priority: Medium

5 SSE 1/4-1/2 Higher — MILITARY MAINTENANCE SHOP 12, 2313 OAKLAND AVE, ELKHART, IN 46517 — LUST — S101138726, N/A

LUST
Facility ID. 012022 — Site No.: 9009589
Responsible Staff XXX — Priority. Low

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)	Facility ID
ELKHART	S100024742	LUSHER AVENUE			SHWS	
ELKHART	1000149914	SYCAMORE STREET	108, 116 & 117	46514	CERCLIS, FINDS, SHWS	
ELKHART	U000186830	MARATHON UNIT 2381	22013 SR 120 & CR 17	46516	UST	005453
ELKHART	U001444341	JR FOOD MART/SIX SPAN	21870 SR 120	46516	UST	000052
ELKHART	S101138762	YODER SIX SPAN 76	21870 S R 120		LUST	
ELKHART	1000921810	ELKHART PLATING CORP	1913 S 14TH ST	46516	RCRIS-LQG	
ELKHART	1000979201	GODFREY CONVEYOR CO INC	430 CR 15	46516	RCRIS-SQG, FINDS	
ELKHART	U000194458	INDIANA DEPT OF TRANSPORTATION	51438 SR 19	46516	UST	017343
ELKHART	U001076960	BOCK INDUSTRIES INC	57540 SR 19 S	46516	UST	002479
ELKHART	S101138752	AMERICAN TRAILER	HIGHWAY 19 NORTH		LUST	
ELKHART	S101138763	*UNITED UNIT # 6086*	*57766 S R. 19*		LUST	
ELKHART	U002178595	DEL'S MARATHON SERVICE STATION	SR 19 & CR 6		UST	
ELKHART	S101138707	MDK OIL CO	51451 SR 19N		LUST	
ELKHART	1000996422	BELMONT-HURON STREETS	BELMONT & HURON	46516	CERCLIS	
ELKHART	S101138738	CITY OF ELKHART	BENHAM / MARTIN KING		LUST	
ELKHART	U002178649	FORMER SERVICE STATION	NW CORNER INDIANA & BENHAM AVE		UST	
ELKHART	1000707312	WAGNER AVENUE SITE	NW CORNER OF WAGNER & SIXTH STREET	46516	CERCLIS, FINDS	
ELKHART	S101138755	VARIOUS SITES	W FRANKLIN / INDIANA		LUST	
ELKHART	U001079341	PICKRELL'S FLORIST INC	30803 US HIGHWAY 33	46516	UST	016890
ELKHART	U000188024	WYLAND MARINE	13100 E JEFFERSON	46516	UST	010687
ELKHART	1000210976	YODER OIL	1125 KENT STREET	46514	RCRIS-SQG, FINDS, RCRIS-TSD, CORRACTS CERC-NFRAP, UST	015322
ELKHART	1000464810	S AND S BODY SHOP	500 DR KING DR	46516	RCRIS-SQG, FINDS	
ELKHART	1000841365	HERMASEAL CO	1101 LAFAYETTE ST	46514	RCRIS-LQG, RCRIS-TSD, CORRACT:	
ELKHART	1000240589	LUSHER STREET GROUNDWATER CONTAMINATION	LUSHER STREET	46516	CERCLIS, FINDS	
ELKHART	S101138744	CONRAIL	N LUSHER ST		LUST	
ELKHART	S101138754	VARIOUS SITES	OAKLAND AVE		LUST	
ELKHART	1000215629	SUPERIOR STREET AREA	N OF PENN CENTRAL RR & W OF RIVERVIEW	46516	CERCLIS, FINDS	
ELKHART	1000230569	GODFREY CONVEYOR CO INC	720 CO RD 15	46516	FINDS, RCRIS-LQG	
ELKHART	1000239911	ELKHART SLUDGE FARM	CO RD 3	46514	CERCLIS, FINDS	
ELKHART	1000703841	GEMEINHARDT	57882 STATE RD 19S	46517	RCRIS-SQG, RCRIS-TSD	
ELKHART	1000109016	CTS CORP ELKHART PLASTICS DIV	900 NORTH WEST BLVD	46514	FINDS, RCRIS-LQG, RCRIS-TSD, CORRACTS, CERC-NFRAP	
ELKHART COUNTY	S100343243	NEW PARIS LF			SWF/LF	
ELKHART COUNTY	S100521542	ELKHART COUNTY LF			SWF/LF	
ELKHART COUNTY	S100521543	OAK RIDGE CEMETERY SFS			SWF/LF	
ELKHART COUNTY	S100521544	SCHULT HOMES SFS			SWF/LF	
ELKHART COUNTY	S101429605	EARTHMOVERS LANDFILL	CR 26, 1/2 MILE EAST OF CR 7		SWF/LF	
ELKHART COUNTY	S101429606	COUNTY ROAD 45 PIT C/D SITE	24399 CR 45, NEAR TOWN OF DUNLAP		SWF/LF	
ELKHART COUNTY	S101273025	ELKHART COUNTY LANDFILL (CR 7 LANDFILL)	CR 7, 1 1/2 MILES SOUTH OF CR 20, 59530		SWF/LF	

GEOCHECK VERSION 2.1
PUBLIC WATER SUPPLY SYSTEM INFORMATION

Searched by Nearest Well.

PWS SUMMARY:

PWS ID.	IN2200349	PWS Status:	Active	Distance from TP	1/2 - 1 Mile
Date Initiated:	March / 1981	Date Deactivated	Not Reported	Dir relative to TP:	North
PWS Name.	CHICKEN COOP OF INDIANA INC 2727 BENHAM AVE ELKHART, IN 46514				
Addressee / Facility Type:	Not Reported				
Facility Name:	Not Reported				
Facility Latitude:	41 40 54		Facility Longitude:	085 58 36	
City Served:	ELKHART				
Treatment Class:	Untreated		Population Served:	501 - 1,000 Persons	

Well currently has or has had major violation(s): No

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
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.

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 RECORDS:

CERCLIS: Comprehensive Environmental Response, Compensation, and Liability Information System
Source: EPA/NTIS
Telephone: 703-603-8904
CERCLIS: 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: 03/31/96
Date Made Active at EDR: 06/03/96
Database Release Frequency: Monthly
Date of Data Arrival at EDR: 04/23/96
Elapsed ASTM days: 41
Date of Last EDR Contact: 06/25/96

ERNS: Emergency Response Notification System
Source: EPA/NTIS
Telephone: 202-260-2342
ERNS: Emergency Response Notification System. ERNS records and stores information on reported releases of oil and hazardous substances.

Date of Government Version: 12/31/95
Date Made Active at EDR: 02/19/96
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 01/26/96
Elapsed ASTM days: 24
Date of Last EDR Contact: 06/25/96

NPL: National Priority List
Source: EPA
Telephone: 703-603-8852
NPL: 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, it is EDR's policy to plot NPL sites greater than approximately 500 acres in size as areas (polygons). Sites smaller in size are point-geocoded at the site's address.

Date of Government Version: 09/01/95
Date Made Active at EDR: 10/25/95
Database Release Frequency: Semi-Annually
Date of Data Arrival at EDR: 10/17/95
Elapsed ASTM days: 8
Date of Last EDR Contact: 06/19/96

RCRIS: Resource Conservation and Recovery Information System
Source: EPA/NTIS
Telephone: 703-308-7907
RCRIS: 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: 02/29/96
Date Made Active at EDR: 05/09/96
Database Release Frequency: Semi-Annually
Date of Data Arrival at EDR: 03/18/96
Elapsed ASTM days: 52
Date of Last EDR Contact: 06/05/96

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

FEDERAL NON-ASTM RECORDS:

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: Varies
Database Release Frequency Varies
Date of Last EDR Contact N/A
Date of Next Scheduled EDR Contact 09/01/95

CORRACTS: Corrective Action Report
Source: EPA
Telephone: 703-308-7907
CORRACTS: CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 04/10/95
Database Release Frequency: Semi-Annually
Date of Last EDR Contact: 06/19/96
Date of Next Scheduled EDR Contact: 09/16/96

FINDS: Facility Index System
Source: EPA/NTIS
Telephone. 800-908-2493
FINDS: Facility Index System FINDS contains both facility information and "pointers" to other sources that contain more detail. These include: RCRIS, PCS (Permit Compliance System), AIRS (Aerometric Information Retrieval System), FATES (FIFRA [Federal Insecticide Fungicide Rodenticide Act] and TSCA Enforcement System, FTTS [FIFRA/TSCA Tracking System]), CERCLIS, DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes), FURS (Federal Underground Injection Control), FRDS (Federal Reporting Data System), SIA (Surface Impoundments), CICIS (TSCA Chemicals in Commerce Information System), PADS, RCRA-J (medical waste transporters/disposers), TRIS and TSCA.

Date of Government Version. 09/30/95
Database Release Frequency Quarterly
Date of Last EDR Contact. 06/05/96
Date of Next Scheduled EDR Contact 10/07/96

HMIRS: Hazardous Materials Information Reporting System
Source. U.S Department of Transportation
Telephone. 202-366-4555
HMIRS. Hazardous Materials Incident Report System HMIRS contains hazardous material spill incidents reported to DOT

Date of Government Version 12/31/95
Database Release Frequency Annually
Date of Last EDR Contact. 04/29/96
Date of Next Scheduled EDR Contact: 07/29/96

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: 02/13/96
Database Release Frequency Quarterly
Date of Last EDR Contact: 04/15/96
Date of Next Scheduled EDR Contact. 07/15/96

NPL LIENS: Federal Superfund Liens
Source: EPA
Telephone: 205-564-4267
NPL LIENS: 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. 06/25/96
Date of Next Scheduled EDR Contact 08/26/96

PADS: PCB Activity Database System
Source: EPA
Telephone: 202-260-3992
PADS 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: 10/14/94
Database Release Frequency: Semi-Annually
Date of Last EDR Contact: 05/20/96
Date of Next Scheduled EDR Contact: 08/19/96

RAATS: RCRA Administrative Action Tracking System
Source: EPA
Telephone 202-564-4104
RAATS: 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

Date of Government Version: 04/17/95
Database Release Frequency: Semi-Annually
Date of Last EDR Contact 06/19/96
Date of Next Scheduled EDR Contact: 09/16/96

ROD: Records Of Decision
Source: NTIS
Telephone 703-416-0703
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 03/31/95
Database Release Frequency: No Update Planned
Date of Last EDR Contact: 06/07/96
Date of Next Scheduled EDR Contact 09/02/96

TRIS: Toxic Chemical Release Inventory System
Source: EPA/NTIS
Telephone 202-260-2320
TRIS: 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: 12/31/92
Database Release Frequency Annually
Date of Last EDR Contact 07/08/96
Date of Next Scheduled EDR Contact: 09/30/96

TSCA: Toxic Substances Control Act
Source: EPA/NTIS
Telephone 202-260-1444
TSCA: 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 USEPA has no current plan to update and/or re-issue this database

Date of Government Version: 01/31/95
Database Release Frequency: Annually
Date of Last EDR Contact: 06/21/96
Date of Next Scheduled EDR Contact 09/16/96

STATE OF INDIANA ASTM RECORDS:

LUST: Lust List
Source. Department of Environmental Management
Telephone 317-233-6366
LUST· 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. 07/01/94
Date Made Active at EDR 12/23/94
Database Release Frequency Annually
Date of Data Arrival at EDR 10/01/94
Elapsed ASTM days. 83
Date of Last EDR Contact 06/28/96

SHWS: List of Hazardous Waste Response Sites Scored Using the Indiana Scoring Model
Source: Department of Environmental Management
Telephone: 317-308-3052
SHWS· 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 12/10/95
Date Made Active at EDR· 01/24/96
Database Release Frequency: Annually
Date of Data Arrival at EDR· 01/23/96
Elapsed ASTM days: 1
Date of Last EDR Contact· 04/12/96

SWF/LF: Permitted Solid Waste Facilities
Source: Department of Environmental Management
Telephone 317-232-4445
SWF/LF: 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 Section 2004 criteria for solid waste landfills or disposal sites

Date of Government Version· 01/08/96
Date Made Active at EDR· 02/27/96
Database Release Frequency. Semi-Annually
Date of Data Arrival at EDR· 01/26/96
Elapsed ASTM days· 32
Date of Last EDR Contact· 07/01/96

UST: Indiana Registered Underground Storage Tanks
Source: Department of Environmental Management
Telephone· 317-233-6400
UST: 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: 10/10/95
Date Made Active at EDR: 11/20/95
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 10/17/95
Elapsed ASTM days 34
Date of Last EDR Contact. 06/28/96

STATE OF INDIANA NON-ASTM RECORDS:

SPILLS: Spills Incidents
Source· Department of Environmental Management
Telephone: 317-233-6413

Date of Government Version· 09/16/95
Database Release Frequency Semi-Annually
Date of Last EDR Contact· 06/17/96
Date of Next Scheduled EDR Contact. 09/16/96

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Historical and 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

Former Manufactured Gas (Coal Gas) Sites: The existence and location of Coal Gas sites is provided exclusively to EDR by Real Property Scan, Inc \251Copyright 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.

DELISTED NPL: Delisted NPL Sites
Source: EPA
Telephone: 703-603-8769
DELISTED NPL: 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.

NFRAP: No Further Remedial Action Planned
Source: EPA/NTIS
Telephone: 703-416-0702
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.

FRDS: Federal Reporting Data System
Source: EPA/Office of Drinking Water
Telephone: 202-260-2805
FRDS provides information regarding public water supplies and their compliance with monitoring requirements, maximum contaminant levels (MCL's), and other requirements of the Safe Drinking Water Act of 1986

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

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 who, due to their fragile immune systems, are deemed to be especially sensitive to environmental discharges These typically include the elderly, the sick, and children. While the exact location of these sensitive receptors cannot be determined, EDR indicates those facilities, such as schools, hospitals, day care centers, and nursing homes, where sensitive receptors are likely to be located

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

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.

Flood Zone Data: This data, available in select counties across the country, was obtained by EDR in 1994 from the Federal Emergency Management Agency (FEMA) Data depicts 100-year and 500-year flood zones as defined by FEMA.

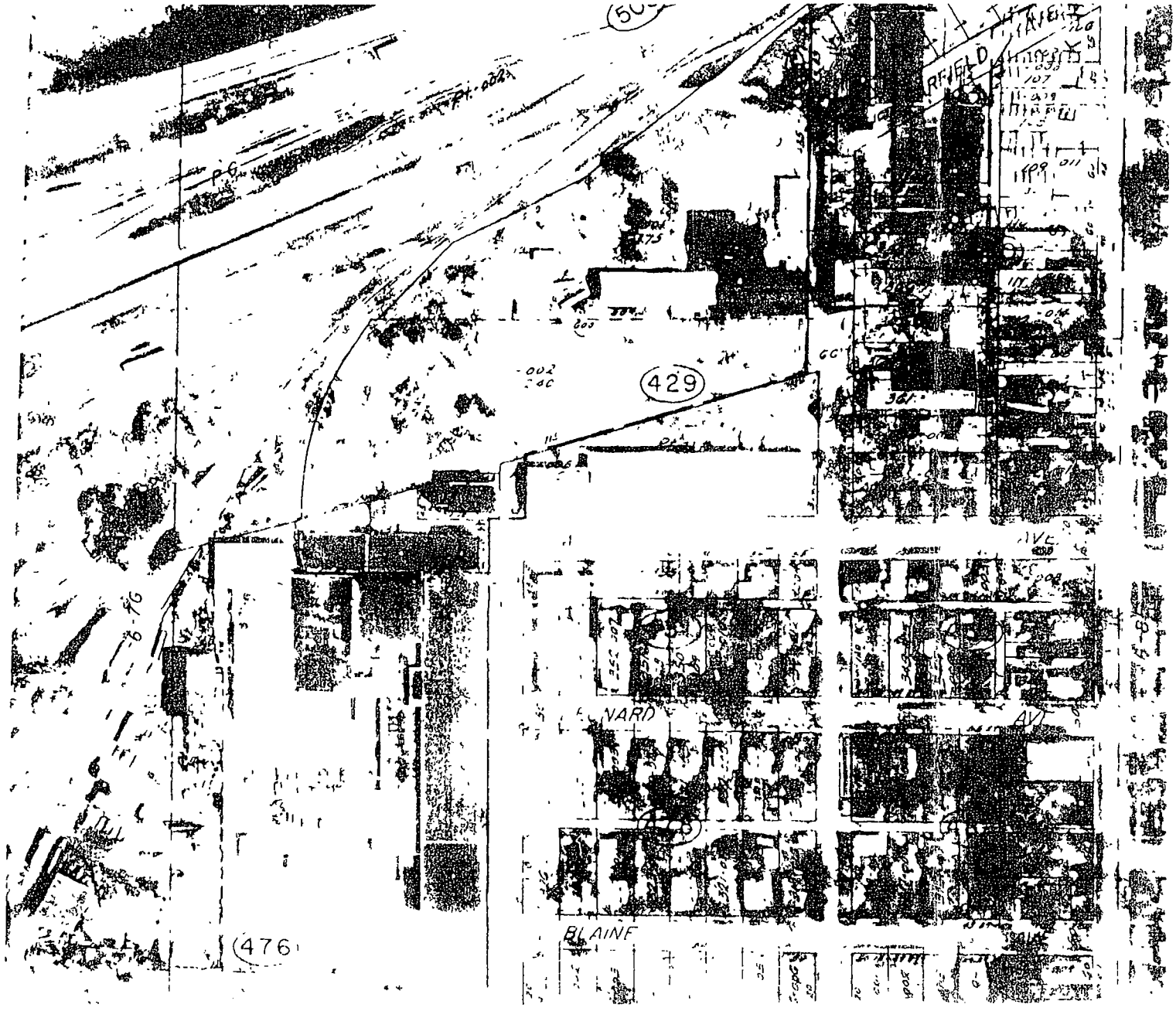
Epicenters: World earthquake epicenters, Richter 5 or greater
Source: Department of Commerce, National Oceanic and Atmospheric Administration

Water Dams: National Inventory of Dams
Source: Federal Emergency Management Agency
Telephone 202-646-2801
WATER DAMS: National computer database of more than 74,000 dams maintained by the Federal Emergency Management Agency.

Community and Non-Community Wells
Source: Department of Environmental Management
Telephone: 317-323-4166

ATTACHMENT F

• AERIAL PHOTOGRAPHS •



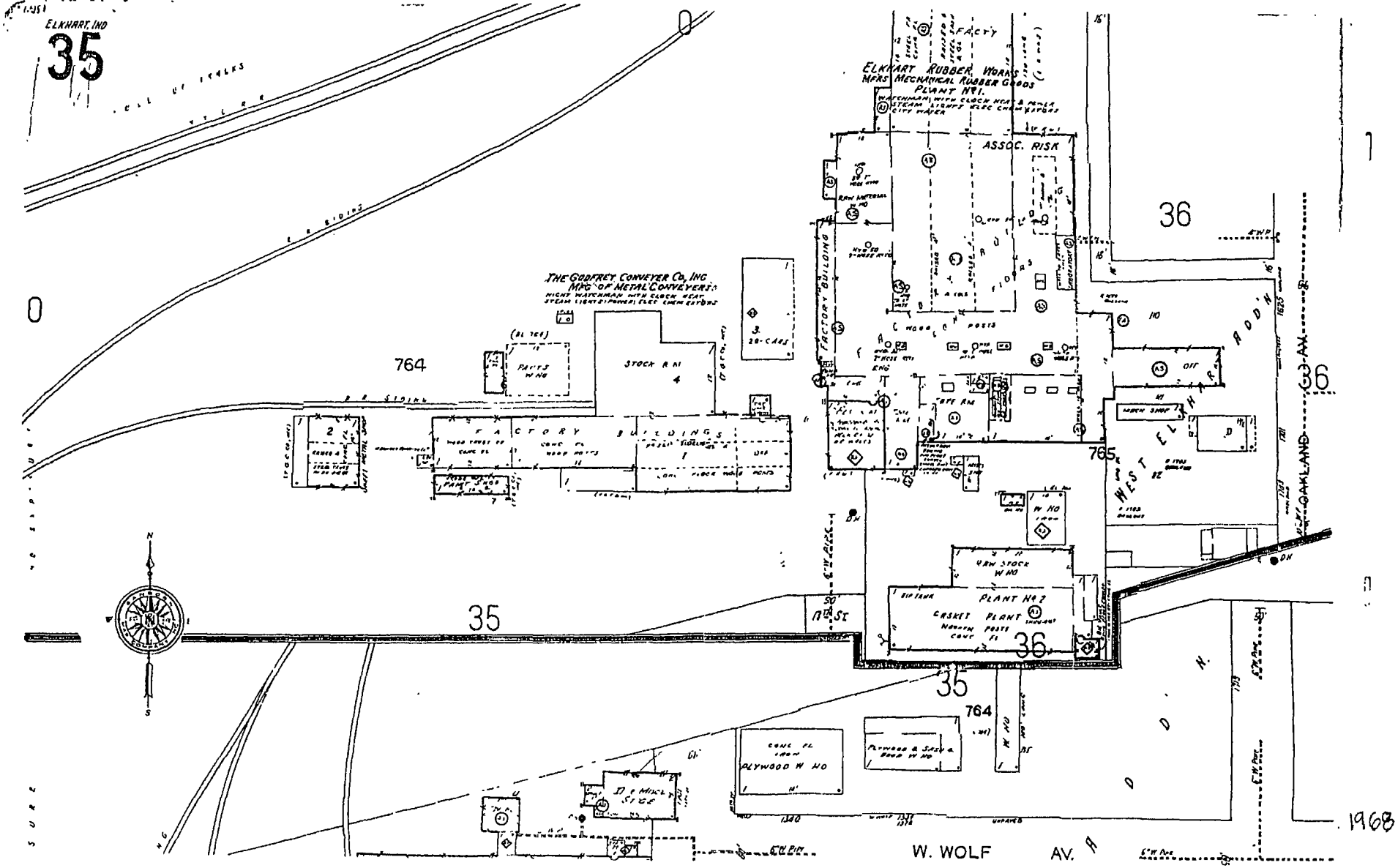
1977

Pt-002
P/C
429
-002
2.40
-005
.06 Pl
-006
365
WOLF
ST
LEONARD
AVE
AVE
FIELD
-007
-008
107
-009
-010
108
109
132

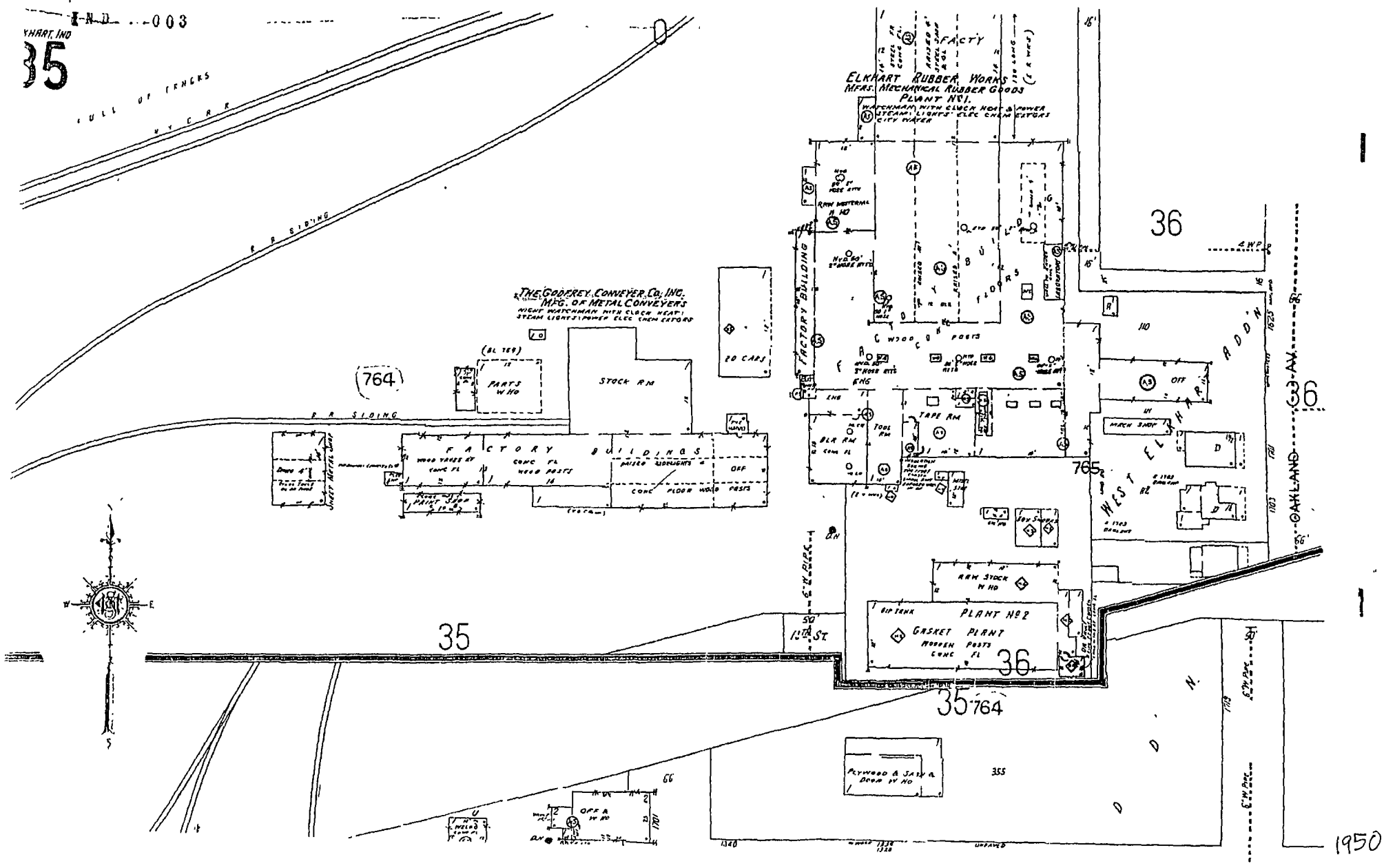
1993

ATTACHMENT G

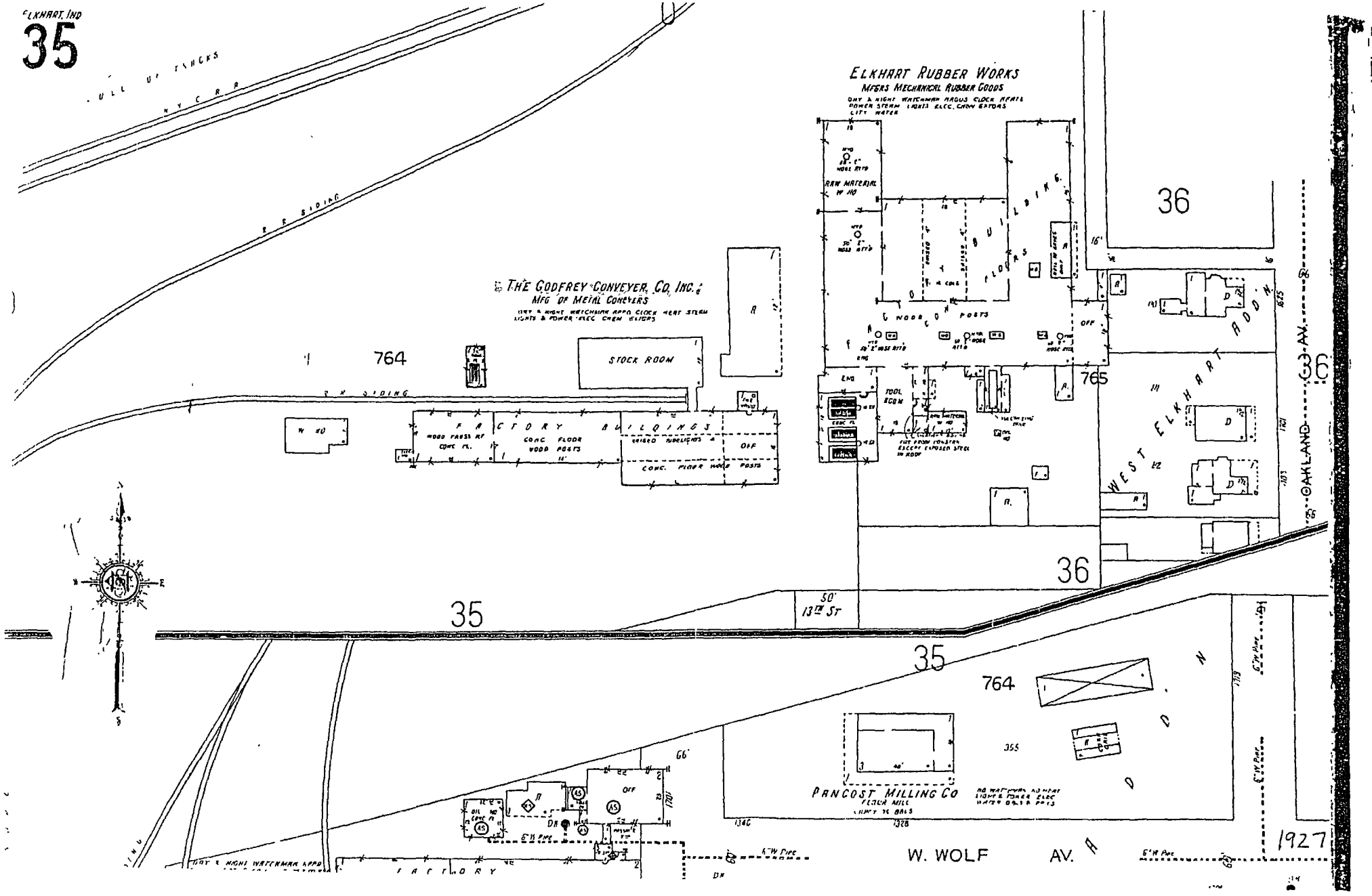
• SANBORN MAPS •



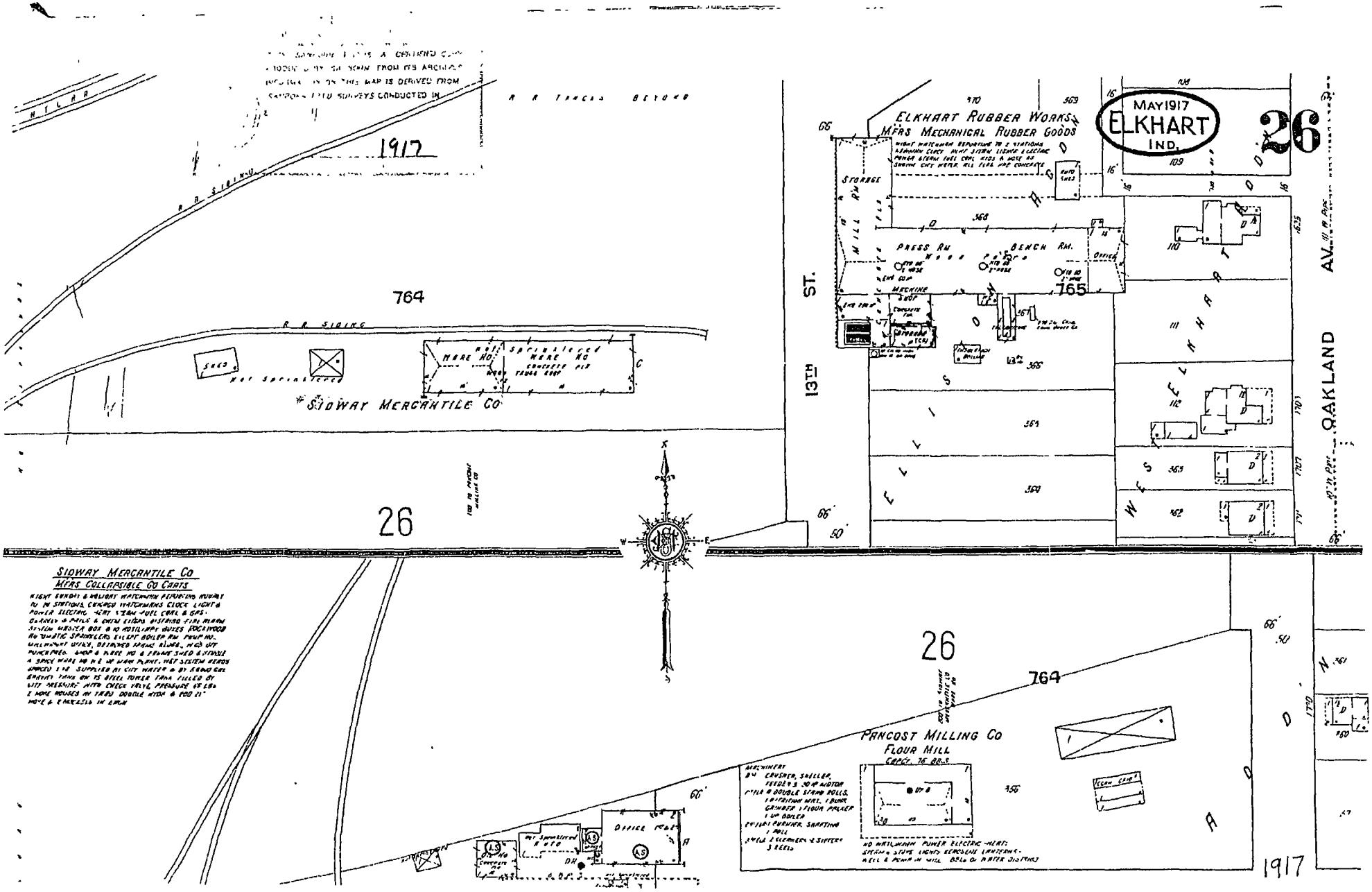
ELKHART, IND
35
THE GODFREY CONVEYER CO, INC
MFG OF METAL CONVEYERS
ELKHART RUBBER WORKS
MFRS MECHANICAL RUBBER GOODS
PLANT No 1.
ASSOC. RISK
FACTORY BUILDING
FACTORY BUILDINGS
STOCK RM
764
765
36
35
PLANT No 2
GASKET PLANT
RAW STOCK W HO
PLYWOOD W HO
W. WOLF AV.
OAKLAND AV.
1968



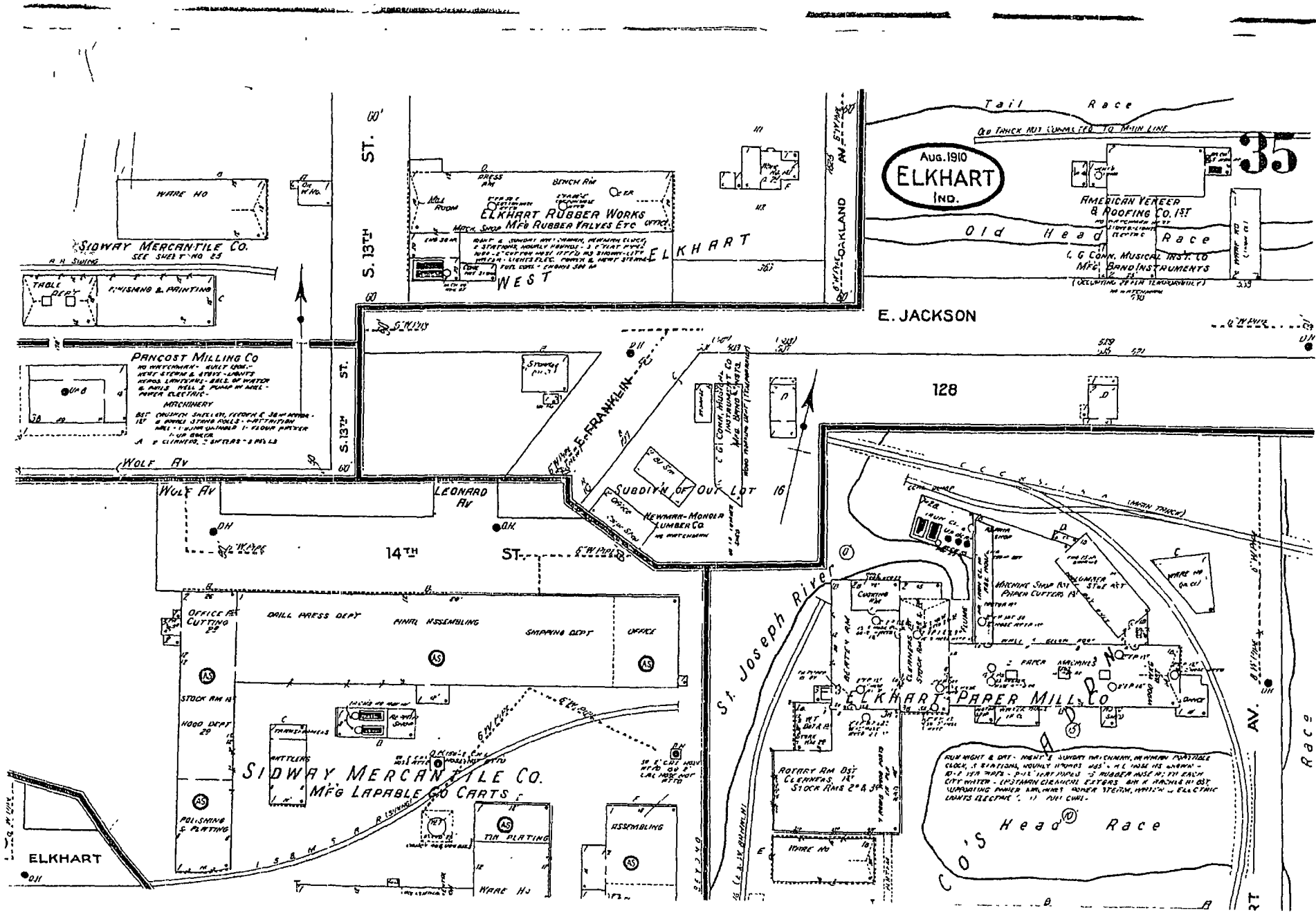
IND 003
35
FULL OF TANKS
R R SIDING
THE GODFREY CONVEYER CO. INC.
MFG. OF METAL CONVEYERS
NIGHT WATCHMAN WITH CLOCK HEAT
STEAM LIGHTS POWER ELEC CHEM EXTGRS
764
PARTS W HO
STOCK RM
20 CARS
FACTORY BUILDINGS
WOOD VALVE RT
CONC FL
WOOD POSTS
RAISED SIDELIGHTS
OFF
CONC FLOOR WOOD POSTS
PAINT SHOP
SHEET METAL SHOP
FACTY
ELKHART RUBBER WORKS
MFRS. MECHANICAL RUBBER GOODS
PLANT No 1.
WATCHMAN WITH CLOCK HEAT & POWER
STEAM LIGHTS ELEC CHEM EXTGRS
CITY WATER
FACTORY BUILDING
FACTORY BUILDING
FLOORS
WOOD POSTS
TAPE RM
TOOL RM
BLR RM
CONC FL
36
OFF
MACH SHOP
WEST ELKHART ADD'N
765
OAKLAND AV
RRW STOCK W HO
PLANT No 2
GASKET PLANT
WOODEN POSTS
CONC FL
36
35
35 764
PLYWOOD & SASH & DOOR W HO
355
OFF & W HO
1950



ELKHART, IND
35
ELKHART RUBBER WORKS
MFGRS MECHANICAL RUBBER GOODS
THE GODFREY CONVEYER CO. INC.
MFG OF METAL CONVEYERS
STOCK ROOM
764
765
36
35
13TH ST
50'
WEST ELKHART ADD'N
OAKLAND AV.
PANCOST MILLING CO
FLOUR MILL
W. WOLF AV.
1927



MAY 1917
ELKHART
IND.
26
ELKHART RUBBER WORKS
MFRS MECHANICAL RUBBER GOODS
STORAGE
MILL RM
PRESS RM
BENCH RM.
MACHINE SHOP
OFFICE
765
13TH ST.
OAKLAND AV.
ELLISON ADDN
WEST ELKHART ADDN
R R TRACKS BEYOND
R R SIDING
764
SIDWAY MERCANTILE CO
SHED
Not Sprinklered
WARE HO
Not Sprinklered
WARE HO
CONCRETE PLK
TRUSS ROOF
26
SIDWAY MERCANTILE CO
MFRS COLLAPSIBLE GO CARTS
26
764
PANCOST MILLING CO
FLOUR MILL
CAPCY. 75 BBLS
MACHINERY
BM CRUSHER, SHELLER, FEEDER & 30 HP MOTOR
1 PAIR & DOUBLE STAND ROLLS, 1 PAIRSTAND MAIL, 1 BUNK GRINDER 1 FLOUR PACKER 1 UP BOILER
1 BURNER, SHAFTING 1 ROLL
2 SCRUBBERS 2 SIFTERS 3 REELS
NO WATCHMAN POWER ELECTRIC HEAT: STEAM & STOVE LIGHTS KEROSENE LANTERNS-WELL & PUMP IN MILL BBLS OF WATER DISTRICT
OFFICE
1917



Aug. 1910
ELKHART
Ind.
35
Tail Race
Old Head Race
AMERICAN VENEER & ROOFING CO. 1ST
C. G. CONN. MUSICAL INST. CO
MFG BAND INSTRUMENTS
E. JACKSON
128
ELKHART RUBBER WORKS
MFG RUBBER VALVES ETC
WEST ELKHART
OAKLAND AV
S. 13TH ST.
SIDWAY MERCANTILE CO.
SEE SHEET NO 25
WARE HO
TABLE DEPT
FINISHING & PAINTING
PANCOST MILLING CO
MACHINERY
WOLF AV
LEONARD AV
14TH ST.
E. FRANKLIN
SUBDIV'N OF OUT LOT 16
NEWMAN-MONDER LUMBER CO
OFFICE & CUTTING 29
DRILL PRESS DEPT
FINAL ASSEMBLING
SHIPPING DEPT
OFFICE
STOCK RM 13
HOOD DEPT 29
SIDWAY MERCANTILE CO.
MFG LAPABLE CO CARTS
POLISHING & PLATING
TIN PLATING
ASSEMBLING
WARE HO
ELKHART
St. Joseph River
ELKHART PAPER MILL CO
ROTARY RM DST CLEANERS, 1ST STOCK RMS 2ND & 3RD
WARE HO
Head Race
CO'S
AV.
Race

1910

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PRC

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

ILC PRODUCTS COMPANY, INC. ELKHART, INDIANA IND 005 470 521

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

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EPA Region	:	5
Site No.	:	IND 005 470 521
Date Prepared	:	March 24, 1992
Contract No.	:	68-W9-0006
PRC No.	:	009-C05087IN2P
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A EPA PRELIMINARY ASSESSMENT FORM 2070-12
B VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
C VISUAL SITE INSPECTION FIELD NOTES

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1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the ILC Products Company, Inc. (ILC) facility in Elkhart, Indiana. The PA was completed on January 3, 1992. PRC gathered and reviewed information from Indiana Department of Environmental Management (IDEM) and from EPA Region 5 RCRA files. PRC also reviewed relevant documentation from the U.S. Department of Agriculture (USDA), United States Geological Survey (USGS), Federal Emergency Management Agency (FEMA), and U.S. Department of Commerce (DOC). The VSI was conducted on January 21, 1992. It included interviews with ILC facility representatives and a walk-through inspection of the facility. Ten SWMUs and no AOCs were identified at the facility.

PRC completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized and 11 inspection photographs are included in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The facility is located at 1819 South 14th Street in Elkhart, Elkhart County, Indiana (latitude 41°40'13" N and longitude 85°59'16" W) as shown in Figure 1. The facility occupies 6.3 acres in an industrial and residential area.

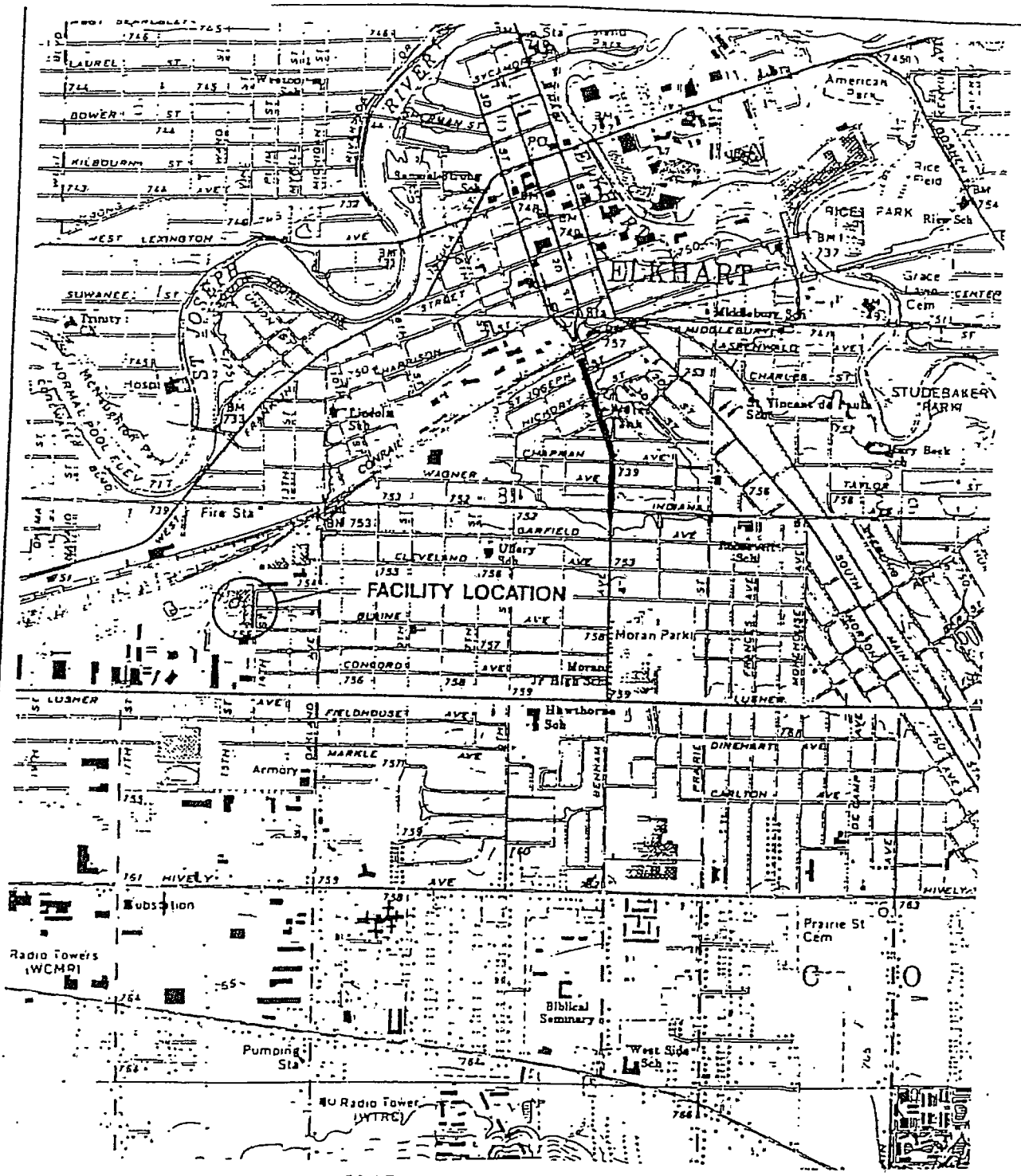
The facility is bordered on the north by Conrail Railroad, on the west by a scrap yard, on the south by Elkhart Plating Company, and on the east by an office building.

2.2 FACILITY OPERATIONS

The facility was built during the 1880s. The first occupant was Sidway Mercantile Company, which manufactured woven baby buggies. Later, the building was used as a railroad car switching depot. In 1939, Industrial Lamp Company moved into the building and began assembling turn signal lamps; in 1959 it began manufacturing aluminum turn signals (lamps) for RVs. In 1969, Industrial Lamp Company was purchased by ILC Products Company, Inc., which was wholly owned by O.H. Williams Investment Co. and which continued manufacturing processes. In 1980 the holding company, O.H. Williams Investment Co. was purchased by Patrick Industries, Inc. during a hostile take-over. In 1985 ILC Products Company, Inc. became a division of Patrick Industries, Inc. In 1990, ILC stopped all manufacturing processes at this location, but continued its painting operations. The facility occupies 6.3 acres in an industrial and residential area. It is completely fenced and has a 24 hour alarm system. ILC employs 16 people working one shift.

From 1959 until 1990 the facility received raw aluminum pieces from an aluminum mill. The aluminum was placed into a tank and heated to 875°F so that it was in liquid form. The aluminum was sent to a die press that forced the aluminum into a certain shape. The newly manufactured part was then cooled, packaged, and shipped.

Dies were cleaned with a caustic which was stored in drums. In 1978 the facility began using the caustic in its wastewater treatment system (SWMU 3) to adjust the pH of the water. The



SCALE: 1" = 2,000'

SOURCE: MODIFIED FROM USGS, 1981

ILC PRODUCTS COMPANY, INC.
ELKHART, INDIANA

FIGURE 1

FACILITY LOCATION

ENVIRONMENTAL MANAGEMENT, INC.

die press process also generated waste lubricating oil. The oil was poured over the presses tokeep them running smoothly.

In 1978 the facility began painting the pieces it manufactured. Currently, painting is the only activity at the facility. At the paint line, the piece is placed on a conveyor belt and sent through a sodium hydroxide wash followed by a water rinse. The piece is then sprayed with chromic acid so that the paint will properly adhere to the aluminum. The part is again rinsed with water and then sent to an oven to dry. Once dry, the part is sent to a spray booth where paint is applied. After the paint is applied, the part is placed into an oven so the paint can dry properly. Wastewater containing sodium hydroxide and chromic acid is treated in the wastewater treatment system (SWMU 3), which generates waste filter cake and waste solvent still bottoms. Waste paints are generated from the paint spray booth walls. Waste solvents and waste still bottoms (F003, F005) are generated in the solvent recycling still. Facility SWMUs are identified in Table 1. The facility layout, including SWMU locations, is shown in Figure 2.

2.3 WASTE GENERATING PROCESSES

From 1959 until 1990 the facility manufactured aluminum parts for RVs and that process generated waste lubricating oil and waste caustic cleaner. In 1978 the facility began painting the aluminum parts it manufactured. The painting process is currently the only process at the facility. The current painting process generates four waste streams: (1) wastewater containing sodium hydroxide and chromic acid from painting pre-treatment; (2) filter cake waste from the Wastewater Treatment System (SWMU 3); (3) heavy waste paint overspray (D001, F003, F005) from the spray booth walls; and (4) waste solvents and waste still bottoms (F003, F005) from the paint lines that can no longer be recycled in the solvent still. Wastes generated at the facility are discussed below and summarized in Table 2. Waste generation rates are based on information provided at the time of the VSI.

As part of the aluminum manufacturing process, the facility received raw aluminum pieces from an aluminum mill. The aluminum was placed into a tank and heated to 875°F until it was in liquid form. The liquid aluminum was forced through a die by a press, allowed to cool and then sold. The die was cleaned with a caustic cleaner (sodium hydroxide). The used caustic cleaner was collected and stored in the Former Underground Storage Tank (SWMU 7) or in the Former Caustic Cleaner Storage Area (SWMU 10). Prior to 1978, about 26,000 gallons of waste caustic cleaner were generated per year. In 1978 the facility began using the waste sodium hydroxide to adjust the pH level in its Wastewater Treatment System (SWMU 3). Because the sodium hydroxide was reused, according to 40 CFR 261.2(e)(1), it is not considered a waste. The aluminum press was kept cool and lubricated by oil which was collected in the Former Waste Oil

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Indoor Waste Storage Area	No	Active, less than 90 day storage
2	Solvent Still Bottoms Satellite Accumulation Area	No	Active
3	Wastewater Treatment System	No	Active
4	Wastewater Treatment Filter Cake Accumulation Area	No	Active
5	Former Waste Oil Drip Pans	No	Inactive since 1990
6	Former Waste Oil Storage Area	No	Inactive since 1990
7	Former Underground Storage Tank	Yes	Inactive, removed in 1986. Closure plan approved by IDEM in 1988 pending modifications which remain unresolved.
8	Former Outdoor Drum Storage Area	Yes	Inactive since 1982. Closure plan approved by IDEM in 1988 pending modifications which remain unresolved.
9	Former Roll-Off Hopper Area	Yes	Inactive since 1982. Closure plan approved by IDEM in 1988 pending modifications which remain unresolved.

TABLE 1 (CONT'D)

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
10	Former Caustic Cleaner Storage Area	Yes	Inactive since 1985. Closure plan approved by IDEM in 1988 pending modifications which remain unresolved.

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Waste lubricating oil, NA**	Press machines	Formerly SWMUs 5 and 6
Wastewater, NA**	Painting pre-treatment	SWMU 3
Heavy waste paint overspray/ D001, F003, F005	Spray booths	SWMU 1
Waste solvents and waste solvent still bottoms/ F003, F005	Solvent stills	SWMUs 1 and 2 and formerly SWMU 9
Filter cake waste, NA**	Wastewater treatment system filter press	SWMUs 1 and 4, formerly SWMUs 8 and 9
Fuel oil with caustic/D002	Die cleaning	SWMU 7
Waste caustic cleaner/D002	Die cleaning	SWMU 7, formerly SWMU 10

Notes:

* Primary management unit refers to a SWMU that currently manages or formerly managed the waste.

** Nonapplicable (NA) designates nonhazardous waste.

Drip Pans (SWMU 5) and transferred into 275-gallon steel tanks in the Former Waste Oil Storage Area (SWMU 6) prior to disposal by Bereth Oil, Mishawaka, Indiana. About 1,100 gallons of waste oil were generated per year.

In 1978 the facility began painting the aluminum parts it manufactured. The painting process consists of placing a part on a conveyor belt and sending it through a sodium hydroxide wash followed by a water rinse. The part is then sprayed with chromic acid in order for the paint to properly adhere to the aluminum. The part is again rinsed with water and then sent to an oven to dry. The sodium hydroxide mixed with water and the chromic acid mixed with water are collected in the sump pit portion of the Wastewater Treatment System (SWMU 3) and pumped into 7,500-gallon steel holding tank. Once the holding tank is full, the wastewater is pumped to a 7,500-gallon steel treatment tank where its pH is adjusted to neutral with caustics or acids. The sludge generated from pH adjustment is allowed to settle and then pumped into a 2,000-gallon fiberglass sludge holding tank. Water overlying the sludge in the 7,500 gallon tank is decanted and discharged to the City of Elkhart Sanitary System. From the 2,000 gallon tank, the sludge is pumped to a filter press where effluent and filter cake waste are generated. The effluent is returned to the 7,500 gallon holding tank where it goes through treatment. The filter cake waste is placed into a 10-cubic yard, plastic-lined box in the Wastewater Treatment Filter Cake Accumulation Area (SWMU 4) located next to the filter press. When the box is full, it is transferred to the Indoor Waste Storage Area (SWMU 1) to await disposal as a special waste by Himco Waste-Away Service, Inc., Elkhart, Indiana. About 60 cubic yards of filter cake waste is generated per year.

Prior to 1982, the facility placed the filter cake waste into 55-gallon drums and stored the drums, for greater than 90 days, in the Former Outdoor Drum Storage Area (SWMU 8) and the Former Roll-off Hopper Area (SWMU 9). Closure for these areas began in 1985 and has not been acknowledged by EPA or IDEM.

After pretreatment, the part is sent to a spray booth to be painted. Heavy paint overspray (D001, F003, F005) from spray booth walls is collected in 5-gallon buckets and placed in the Indoor Waste Storage Area (SWMU 1) to await disposal by Safety & Environmental Resources, Inc. (SER), Mishawaka, Indiana. About 1,000 gallons of heavy paint overspray (D001, F003, F005)is generated per year. The facility changes paint colors throughout the day and cleans the paint lines with a xylene solvent. The used solvent (F003, F005) is recycled through a still. Solvent still bottoms (F003, F005) from the recycling process are accumulated in a 55-gallon drum in the Solvent Still Bottoms Satellite Accumulation Area (SWMU 2). Occasionally the waste solvent (F003, F005) becomes too thick to be sent through the still and is also placed inside the 55-gallon drum with the still bottoms in SWMU 2. When the drum is full, it is transferred to the

Indoor Waste Storage Area (SWMU 1) to await disposal by SER. About 1,900 gallons of waste solvent and waste solvent still bottoms are generated per year. Heavy waste paint overspray, used solvents, and solvent still bottoms were stored in the Former Roll-Off Hopper Area (SWMU 9) until 1982.

2.4 HISTORY OF DOCUMENTED RELEASES

This section discusses the history of documented releases to ground water, surface water, air, and on-site soils at the ILC facility.

During soil testing required by the approved Modified Closure Plan of September 28, 1988, about 12 cubic yards of chromium contaminated soil, 6 inches in depth, was discovered in the Former Roll-off Hopper Area (SWMU 9) in December 1988. Additional samples were collected and on November 11, 1991, the facility filed a Special Waste Certification Application with IDEM to transport the contaminated soil to Elkhart County Landfill, Elkhart, Indiana as a special waste. The chromium-contaminated top soil is still in place while the facility is awaits approval from IDEM to excavate and dispose of the waste.

In December 1988 testing of soil samples collected in the Former Underground Storage Tank (SWMU 7) area and in the Former Outdoor Drum Storage Area (SWMU 8) indicated that the soil was not contaminated.

A May 26, 1988 IDEM facility inspection noted that wastewater treatment sludge had spilled on the floor in the wastewater treatment room. The spillage was swept up every three days (IDEM, 1988c). This inspection also noted black, discolored soil in the outside courtyard in the area of the Former Underground Storage Tank (SWMU 7). In 1989 the soil was sampled, tested, and found not to be contaminated (EIS, 1989).

2.5 REGULATORY HISTORY

ILC filed a Notification of Hazardous Waste Activity on July 11, 1980 which listed F017, F018, U239, and U220 wastes (ILC, 1980a). The facility filed a RCRA Part A permit application on October 27, 1980 (ILC, 1980b). This application covered 15,000,000 gallons per day of tank storage (T01) and 3,000,000 gallons per day of filter press storage (T04) for D004 waste.

On October 11, 1984, the Indiana State Board of Health (ISBH) conducted a RCRA interim status inspection and found that the wastes listed on the 1980 Part A permit application were generated from a wastewater treatment system which was exempt from RCRA regulation.

The October 1984 inspection also found that the facility generated and stored for greater than 90 days at least two additional waste streams not named on its 1980 Part A permit application (ISBH, 1985a). On December 20, 1984 ISBH sent a Notice of Violation (NOV) concerning violation of interim status requirements (mostly paperwork violations) to the facility (ISBH, 1984). This NOV did not address permit violations, since ISBH was directed to refer such violations to the EPA. ISBH addressed the permit violations as directed by EPA on May 28, 1985, when it sent a Notice of Violation and Inadequacy (NOVI) to ILC (ISBH, 1985b).

The facility, through its representative, Bill Fletcher and Associates (BFA), requested and received a 30-day extension to respond to the December 1984 NOV (BFA, 1985a). The facility responded on February 20, 1985. Its response was inadequate and it received a Notice of Violation and Inadequacy (NOVI) on May 28, 1985 (ISBH, 1985b). The facility responded to the NOVI on July 22, 1985. Its response was again inadequate, and it received a Notice of Inadequacy (NOI) on August 15, 1985 (ISBH, 1985c).

The facility filed an amended Part A permit application on August 22, 1985 (BFA, 1985b). This application covered 6,160 gallons of container storage (S01) for F019, F001, F003, and F005 wastes. On September 9, 1985, the facility submitted a second amended Part A permit application, following an undocumented telephone conversation with ISBH (BFA, 1985c). This second amended application covered 1,800 gallons of container storage (S01) for F001 and F017 waste. The 6,160 gallons of container storage (S01) for F019, F001, F003, and F005 wastes were removed.

On September 26, 1985, the facility submitted EPA Policy Form 121, Container/Storage Closure Request, to ISBH (BFA, 1985d). This form, certifying that the facility does not store hazardous waste for greater than 90 days was returned on October 22, 1985 because an underground storage tank (UST) containing unknown waste was discovered by the facility (ISBH, 1985d).

On December 11, 1985, the facility resubmitted EPA Policy Form 121 along with (1) a Waste Analysis Profile for the tank contents and (2) a notification of an underground storage tank in use (BFA, 1985d). Resubmission of the Form 121 and attachments was acknowledged by EPA Region 5 on January 3, 1986 (EPA, 1986). EPA Region 5 requested state confirmation of closure (EPA, 1986). On March 7, 1986, the facility sent a letter to ISBH requesting a change in status to generator only (BFA, 1986a).

On March 17, 1986, the facility received a NOV resulting from a RCRA record review inspection (ISBH, 1986a). According to ISBH, the facility stored waste in the UST for greater

than 90 days. Additionally, its notification for Underground Storage Tank in use was in error because Form 121 was not appropriate for tanks containing hazardous waste. ISBH sent a memo to the facility and required ILC to submit a closure plan for its UST and its container storage areas (ISBH, 1986b). The facility responded to the March 17, 1986 NOV on March 31, 1986, by submitting a closure and removal plan for its UST but not for its storage areas (BFA, 1986b).

On August 15, 1986 the facility reported to the Indiana Department of Environmental Management (IDEM) (formerly ISBH) that the UST was removed. According to ILC, the tank was in reasonably good condition. No spills or leaks were noted during removal (BFA, 1986c). The facility again requested a change in status to generator only. Manifests for the tank removal were incorrect. The facility rectified the errors on November 25, 1986, and again requested a change in status to generator only (BFA, 1986d).

On October 9, 1986, IDEM conducted a full interim status inspection and noted numerous violations such as inadequate manifests, unmarked containers, and no waste analysis for certain wastes (IDEM, 1986). On April 6, 1987, the facility received a NOV from IDEM requesting correction of these violations (IDEM, 1987a). This NOV also requested a composite closure plan detailing procedures used to determine contamination after the UST was removed and detailing closure of its container storage area.

The facility responded to the NOV on May 18, 1987 (BFA, 1987a). On June 25, 1987, the facility received a NOI from IDEM (IDEM, 1987b). The facility responded on July 28, 1987 and its response was inadequate (IDEM, 1987c). It received another NOI on September 25, 1987 (IDEM, 1987c). The facility resubmitted its closure plan along with financial assurance documents on December 1, 1987 (BFA, 1987b). IDEM issued a Notice of Violation with Proposed Agreed Order on May 11, 1988 because ILC's response to the October 1986 NOV was inadequate (IDEM, 1988a). The facility signed this order on September 1, 1988 (IDEM, 1988e).

On May 26, 1988, IDEM conducted a compliance evaluation inspection and noted several violations, such as storing open drums of hazardous wastes (IDEM, 1988a). IDEM discovered that in addition to the UST and the two drum storage areas addressed in the closure plans, the facility had stored trichromic wastewater sludge, waste paint, and waste solvents in containers placed directly on the ground in the Former Roll-Off Hopper Area (IDEM, 1988b). This area was not addressed in previous closure plans. On August 1, 1988, IDEM issued a Notification of Deficiency (NOD) for the facility's closure plan and requested that the facility include closure information for the Former Roll-Off Hopper Area (IDEM, 1988c). The facility responded by submitting a consolidated closure plan on August 16, 1988 (BFA, 1988). IDEM approved this closure plan with modifications on September 28, 1988 (IDEM, 1988d). The approval stipulated

that closure was to take place within 180 days. Within 60 days of completion of closure, the facility was to submit a certification of closure. On December 29, 1988, IDEM issued a Notice of Violation of the September 1988 Agreed Order (IDEM, 1988h). On March 21, 1989, the facility signed another Agreed Order to comply with the terms of the approved Modified Closure Plan (IDEM, 1988g).

On November 4, 1988, IDEM approved the facility's request for a 30-day extension to submit the supplemental information required by the September 28, 1988, approved Modified Final Closure Plan (IDEM, 1988f). On January 13, 1989, the facility submitted its supplemental information (BFA, 1989a), which IDEM determined to be inadequate on March 16, 1989 (IDEM, 1989). The facility addressed the inadequacies on March 27, 1989 (BFA, 1989b).

In 1990, the facility hired a new consulting engineering company, EIS Environmental Engineers, Inc. (EIS). As of October 30, 1991, inadequacies in the supplemental information were not completely addressed (EIS, 1991). Closure has not been approved, and the facility is regulated as a treatment, storage, and disposal facility, although it does not store waste for greater than 90 days.

The facility holds air permit, number 20-06-81-0521, for volatile organic compound emissions generated in its paint spray booth. According to IDEM, the facility was registered for operation in April 1981. This type of air permit does not need to be renewed. ILC applied for another air permit for its recently constructed virgin paint storage area. The facility has no history of odor complaints from area residents. It is not required to have a National Pollutant Discharge Elimination System (NPDES) permit.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the ILC facility.

2.6.1 Climate

The climate in Elkhart County is temperate. The average temperature is 49.6°F. The average daily minimum temperature is 15.5°F in January, and the average daily maximum temperature is 83.1°F in July.

The average annual precipitation is 33.7 inches. The mean annual evaporation for the area is about 30 inches with an annual net precipitation of 3.7 inches (U.S. Department of

Commerce, 1968). The 1-year 24-hour rainfall is 2.3 inches (U.S. Department of Commerce, 1963).

The prevailing wind is from the southwest. Maximum average wind speed is 12 miles per hour (U.S. Department of Commerce, 1968).

2.6.2 Flood Plain and Surface Water

The facility is about 755 feet above mean sea level. It is situated about 1/2 mile southeast of the St. Joseph River at its closest point. The facility is about 1-3/4 miles south of Christiana Creek and 5 miles south of Simonton Lake. Surface water drainage at the site appears to be in a north-northwesterly direction toward the St. Joseph River. The facility is located in a Zone C flood plain area (FEMA, 1985). This is considered to be an area of minimal flooding.

2.6.3 Geology and Soils

Elkhart County is in extreme north-central Indiana. The northern portion of the county is characterized by nearly level and gently sloping eolian and outwash sands, nearly level to moderate sloping outwash terraces and plains in the northern and central parts, and nearly level to strongly sloping glacial till plains in the eastern and western parts. The county is drained mainly by the Elkhart and St. Joseph Rivers (USDA, 1974).

Surficial geology in Elkhart County is characterized by glacial till deposits, about 300 feet thick, of the Wisconsinan Age. Soils in the general facility area are characterized as "made land" and consist of levelled or filled areas that may have any combination of sand, silt, clayey material, and trash.

As part of closure activities for SWMUs 7, 8, 9, and 10, soil borings were conducted at the facility to a depth of 18 inches. Those borings indicate surficial deposits consist of fill material underlain primarily by loamy sand and sandy loam with a trace of clay.

2.6.4 Ground Water

Wells are the major source of drinking water in Elkhart County. The City of Elkhart draws ground water from four separate well fields. The nearest well field is about 1-1/2 miles to the southeast. The direction of ground water flow is north-northwest. Many residents outside the Elkhart city limits get their water from private wells. The static ground water level is 10 to 15 feet below ground surface (IDNR, 1991).

2.7 RECEPTORS

The facility occupies 6.3 acres in an industrial and residential area in Elkhart, Indiana. Elkhart has a population of about 137,330. The facility is bordered on the north by Conrail Railroad, on the west by a scrap yard, on the south by a plating company and on the east by an office building. The nearest residence is about 200 feet east. The nearest school, Lincoln School, is about 1/2 mile north of the facility. Facility access is controlled by a barbed wire fence and a 24-hour alarm system.

The nearest surface water body, the St. Joseph River, is located about 1/2 mile northwest of the facility and is used for recreational purposes. Other surface water bodies in the area include Christiana Creek 1-3/4 miles north and Simonton Lake about 5 miles north of the facility.

Ground water is used as a source of drinking water. The City of Elkhart draws ground water from four separate well fields. The nearest well field to the facility is about 1-1/2 miles to the southeast, upgradient from the facility. The nearest well field located downgradient is about 2-1/2 miles northeast of the facility.

Wetlands are located about 4 miles northeast and 5 miles north of the facility. McNaughton Park is located along the St. Joseph River about 1/2 mile northwest of the facility. According to the information obtained at the time of the VSI and from the USGS topographic map, no forest preserves, no habitats of endangered species, and no other sensitive environments are located within 2 miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the 10 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC observations.

SWMU 1	**Indoor Waste Storage Area**
Unit Description:	This unit consists of an indoor area about 20 feet by 20 feet in the north end along an inside west wall of the facility (see Photograph Nos. 6 and 7). Heavy waste paint overspray (D001, F003, F005) from spray booth walls is accumulated in uncovered 5-gallon plastic buckets. Waste solvents and solvent still bottoms (F003, F005) from the solvent recycling still are stored in 55-gallon drums, which are closed and labeled as hazardous waste. Filter cake waste from the Wastewater Treatment System (SWMU 3) is stored in 10-cubic yard, plastic-lined boxes.
Date of Startup:	This unit began operation in 1978.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages waste paint overspray from spray booth walls, waste solvent and solvent still bottoms (F003, F005) generated from a solvent recycling still, and filter cake waste generated from the Wastewater Treatment System (SWMU 3).
Release Controls:	This unit is inside a building that has a concrete floor with no visible cracks or gaps.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	Several uncovered buckets of heavy waste paint overspray (D001, F003, F005) were placed directly on the concrete along an inside west wall. One closed drum of waste solvent and solvent still bottoms (F003, F005) was placed directly on the concrete and labeled as hazardous waste. The visible portion of the drum did

	not have any holes or cracks at the time of the VSI. Boxes of filter cake waste were placed on pallets and stored closed. The visible portions of the boxes did not have any rips or tears at the time of the VSI. PRC observed no visible evidence of release.
SWMU 2	Solvent Still Bottoms Satellite Accumulation Area
Unit Description:	This unit consists of a 6-foot by 6-foot area inside the solvent recovery room in the northwest portion of the facility. The unit is about 5 feet from the solvent recycling still. Solvent recycling still bottoms and solvent too thick to be recycled through the still are placed in a closed-top 55-gallon drum. When the drum is full, it is transferred to the Indoor Waste Storage Area (SWMU 1), where it is stored for less than 90 days.
Date of Startup:	This unit began operation in 1978.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages waste solvent and solvent still bottoms (F003, F005) from the solvent recycling still.
Release Controls:	This unit is inside the facility on a concrete floor with no visible cracks or gaps.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	One partially full 55-gallon drum was in the area at the time of the VSI. The visible portion of the drum did not have any holes or cracks at the time of the VSI. PRC observed no visible evidence of release.
SWMU 3	Wastewater Treatment System
Unit Description:	This unit consists of a 6-inch concrete berm beneath the spray washers and tanks of raw product. Wastewater from parts washing that has mixed with sodium hydroxide or chromic acid is

accumulated in the bermed area and collected by pumps into a sump area. The wastewater is then pumped into a 7,500-gallon steel holding tank. Once the holding tank is full, the waste is pumped to a 7,500-gallon steel treatment tank where its pH is adjusted. The sludge generated from pH adjustment is allowed to settle and then pumped into a 2,000-gallon fiberglass holding tank. Water overlying the sludge in the 7,500 gallon tank is decanted and then discharged to the City of Elkhart Sanitary System. From the 2,000 gallon tank, the sludge is pumped to a filter press where effluent and filter cake waste are generated. The effluent is placed back into the 7,500 gallon holding tank where it goes through treatment. The filter cake waste is placed into a 10-cubic yard, plastic-lined box in the Wastewater Treatment Filter Cake Accumulation Area (SWMU 4) located next to the filter press (see Photograph Nos. 1, 2, 3, and 4). The unit is located in the southwestern portion of the facility.

Date of Startup: This unit began operation in 1978.

Date of Closure: This unit is currently operational.

Wastes Managed: This unit manages wastewater mixed with sodium hydroxide and chromic acid from paint pre-treatment operations.

Release Controls: This unit is inside a building that has a concrete floor with no visible cracks or gaps.

History of Documented Releases: A May 26, 1988, IDEM facility inspection noted sludge had spilled on the floor and was swept up every three days (IDEM, 1988c).

Observations: PRC observed stained concrete under the filter press at the time of the VSI.

SWMU 4 **Wastewater Treatment Filter Cake Accumulation Area**

Unit Description: This unit consists of a 10-cubic yard, plastic-lined fiber box containing wastewater filter cake waste. It is located directly

	adjacent to the Wastewater Treatment System (SWMU 3) filter press in the southwestern portion of the facility (see Photograph No. 4). When the box is full, it is transferred to the Indoor Waste Storage Area (SWMU 1).
Date of Startup:	This unit began operation in 1978.
Date of Closure:	This unit is currently operational.
Wastes Managed:	This unit manages wastewater filter cake.
Release Controls:	This unit is located inside a building that has a concrete floor with no visible cracks or gaps.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	One partially full box of filter cake waste was in the area at the time of the VSI. The visible portion of the box did not have any holes or rips at the time of the VSI. PRC observed no visible evidence of release.
SWMU 5	**Former Waste Oil Drip Pans**
Unit Description:	These units consisted of 2-inch high metal pans placed beneath the die press machines to collect waste lubricating oil. The actual number of pans and their capacities were not known by facility representatives at the time of the VSI. When full, the oil from the pans was transferred into 275 gallon steel tanks in the Former Waste Oil Storage Area (SWMU 6).
Date of Startup:	This unit began operation in about 1959.
Date of Closure:	These units have been inactive since 1990, when the facility stopped all manufacturing operations.
Wastes Managed:	These units managed waste lubricating oil from the die-press machines.

Release Controls:	These units were located inside a building that has a concrete floor with no visible cracks or gaps.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	At the time of the VSI, PRC observed empty pits where the die press machines were located. PRC observed no visible evidence of release at the time of the VSI.
SWMU 6	**Former Waste Oil Storage Area**
Unit Description:	This unit consisted of an area about 25 feet by 25 feet in the northeastern portion of the facility. It stored two 275-gallon aboveground steel tanks containing waste lubricating oil.
Date of Startup:	This unit began operation in about 1959.
Date of Closure:	This unit has been inactive since 1990, when the facility stopped all manufacturing operations.
Wastes Managed:	This unit managed waste lubricating oil from the die-press machines.
Release Controls:	This unit was inside the facility on a concrete floor with no visible cracks or gaps.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	One empty 275-gallon steel tank was in the area at the time of the VSI (see Photograph No. 8). PRC observed no visible evidence of release.

SWMU 7	**Former Underground Storage Tank**
Unit Description:	This unit consisted of a 10,000-gallon steel tank that held product fuel oil. Upon testing at removal, this unit was also found to contain waste caustic.
Date of Startup:	This unit began operation about 1961.
Date of Closure:	The unit was removed in 1986. EPA and IDEM have not acknowledged closure of the unit.
Wastes Managed:	This unit managed product fuel oil and waste caustic, which was probably sodium hydroxide wastewater from die cleaning operations.
Release Controls:	This unit had no release controls.
History of Documented Releases:	A May 26, 1988, IDEM inspection noted black, discolored soil in the outside courtyard. In 1989, the soil was sampled, tested, and found not to be contaminated (EIS, 1989).
Observations:	PRC observed a snow-covered courtyard at the time of the VSI (see Photograph No. 9). PRC observed no visible evidence of release at the time of the VSI.
SWMU 8	**Former Outdoor Drum Storage Area**
Unit Description:	This unit consisted of a 14-foot by 30-foot concrete pad about 6 inches thick. The unit was adjacent to building "P" and joined another concrete surface, with soil to the west. Filter cake waste from the Wastewater Treatment System (SWMU 3) was placed into 55-gallon drums and stored in this area.
Date of Startup:	This unit began operation in about 1981.

Date of Closure:	This unit has been inactive since 1982. The closure plan was approved with modifications in 1988, but EPA and IDEM have not acknowledged closure.
Wastes Managed:	This unit managed waste filter cake generated during wastewater treatment.
Release Controls:	The unit was located on concrete.
History of Documented Releases:	No releases from this unit have been documented. In 1989, the soil at this unit was sampled, tested, and found not to be contaminated (EIS, 1989).
Observations:	PRC observed a snow-covered concrete pad with drums piled three high at the time of the VSI (see Photograph No. 10). PRC observed no visible evidence of release at the time of the VSI.
SWMU 9	Former Roll-Off Hopper Area
Unit Description:	This unit consisted of a 15-foot by 40-foot outdoor area in the southwest corner of the property. Waste solvents and solvent still bottoms (F003, F005), and filter cake waste were placed into 55-gallon drums, which were placed directly on the ground.
Date of Startup:	This unit began operation in about 1979.
Date of Closure:	This unit has been inactive since 1982. The closure plan was approved with modifications in 1988, but closure has not been completed in accordance with the closure plan.
Wastes Managed:	This unit managed waste solvents and solvent still bottoms (F003, F005) generated from painting processes. This unit also managed wastewater filter cake.
Release Controls:	This unit had no release controls.

History of Documented Releases:	During soil testing required by the September 1988 approved Modified Final Closure Plan, about 12 cubic yards of chromium-contaminated soil, 6 inches deep, was discovered. Additional sampling was conducted and on November 11, 1991, the facility filed a Special Waste Certification Application with IDEM to transport the contaminated soil to Elkhart County Landfill, Elkhart, Indiana, as a special waste (see Photograph No. 11). The facility is awaiting IDEM's approval to dispose of the waste.
Observations:	PRC observed snow-covered ground at the time of the VSI. PRC observed no visible evidence of release at the time of the VSI.
SWMU 10	Former Caustic Cleaner Storage Area
Unit Description:	This unit consisted of a 20-foot by 25-foot area with a concrete floor inside the facility along the west wall. Used sodium hydroxide from die cleaning was placed into 55-gallon drums and stored in this area to await disposal. After 1978, the waste sodium hydroxide (waste caustic cleaner) was used to adjust wastewater pH. Because the used sodium hydroxide was being re-used, according to 40 CFR 261.2(e)(1), it was not considered a waste after 1978.
Date of Startup:	This unit began operation in 1959.
Date of Closure:	This unit has been inactive since 1985. The closure plan was approved with modification in 1988, but EPA and IDEM have not acknowledged closure.
Wastes Managed:	This unit managed waste sodium hydroxide (waste caustic cleaner). In 1978, the waste sodium hydroxide was used to adjust the pH in the wastewater treatment system. Because the used sodium hydroxide was re-used, according to 40 CFR 261.2(e)(1), it is not considered a waste.
Release Controls:	The unit was located indoors on concrete.

History of Documented Releases:	No releases from this unit have been documented. Soil sampling required by the approved Modified Final Closure Plan did not reveal contamination (EIS, 1989).
Observations:	PRC observed an empty concrete floor at the time of the VSI. The concrete floor was in good condition with no visible cracks or gaps. PRC observed no visible evidence of release at the time of the VSI.

4.0 AREAS OF CONCERN

No AOCs were identified during the VSI.

ACOUSTICS BY DESIGN

October 23, 2007

Larry Meteiver
City Attorney
City of Elkhart
229 South 2nd Street
Elkhart, IN 46516
larry@meteiver@coei.org

Re: Sturgis Iron & Metal, 1514 W. Lusher Ave, Elkhart, Indiana
Noise and Vibration Monitoring Report

REPORT:

We have completed the initial sound and vibration monitoring as outlined in the Scope-of-Services section of our proposal. This report describes the monitoring procedure, provides the results and our observations, and draws conclusions regarding sound and vibration present in the residential community.

1. PURPOSE

Monitor sound and vibration levels in the residential community near the Sturgis Iron and Metal Inc. (Sturgis) industrial property in such a manner as to determine the levels of sound and vibration attributable to operations on the Sturgis property. Residential community members have complained to the City about sound and vibration which they believe to be associated specifically with operation of the "Mega Shredder." This sound and vibration survey considered all sound and vibration sources on the Sturgis property. This report presents the results of the sound and vibration survey and compares those results with the sound and vibration criteria stated in the municipal ordinances.

2. TERMINOLOGY AND CONCEPTS

When dealing with sound, there is the physical quantity which is expressed as sound level and the perceived level which is expressed as loudness. Sound level is measured in units called decibels (abbreviated dB). Decibels are power ratios and are logarithmic quantities. Audible sound occurs over a wide frequency range, from approximately 20 Hertz (Hz) to 20,000 Hz. Human hearing does not respond equally to sounds at different frequencies (or pitch). Lower frequency sounds that are equally as "loud" have a much higher decibel level than high

frequency sounds. To accommodate this variation in frequency sensitivity of human hearing, a frequency weighting can be applied to sound level measurements. When the weighting is applied, the resulting sound level measurements are said to be "A-weighted" and the decibel level is abbreviated dBA.

While the decibel or A-weighted decibel are the basic units used for noise measurement, other indices are also used. One index, known as the equivalent sound level and abbreviated as L_{eq}, is commonly used to indicate the average sound level over a period of time. L_{eq} represents the steady level of sound which would contain the same amount of sound energy as does the actual time varying sound level. Although it is an average, it is strongly influenced by the loudest events occurring during the time period because these loudest events contain most of the sound energy.

The logarithmic nature of dB and dBA, and the human subjective perception of relative sound levels, results in the following approximate rules for judging increases in noise. A 3 dBA sound level increase typically cannot be heard or is barely perceptible. A 5 dBA sound level increase is perceptible and is often considered significant. A sound level which increases by 10 dBA will be perceived as twice as loud. These perceived changes in the noise level are mostly independent of the absolute noise level. That is, a 30 dBA noise will be perceived as twice as loud as a 20 dBA noise, and a 70 dBA noise will be perceived as twice as loud as a 60 dBA noise.

3. MEASUREMENT PROCEDURE

3.1 Sound Level Measurement Locations

Sound level monitoring was performed at 9 locations in the residential community, at 3 locations on the Sturgis property, and near the railway that borders the Sturgis property. Because the City of Elkhart ordinance does not specify a height above grade at which sound level measurements are to be made, the data logging sound level meters used for this monitoring were located at roughly the level of a second story window (residences in this neighborhood are generally one or two stories in height). Placing sound level meters at this height above the grade allowed some of the meters to have a direct line of sight over the Sturgis's perimeter sound wall and to the Mega Shredder. The measurement locations are presented in Figure 1. Sound level data was collected for seven days. In addition to this automated monitoring, ABD personnel made short duration measurements at the monitoring locations using hand held, real time signal analyzers.

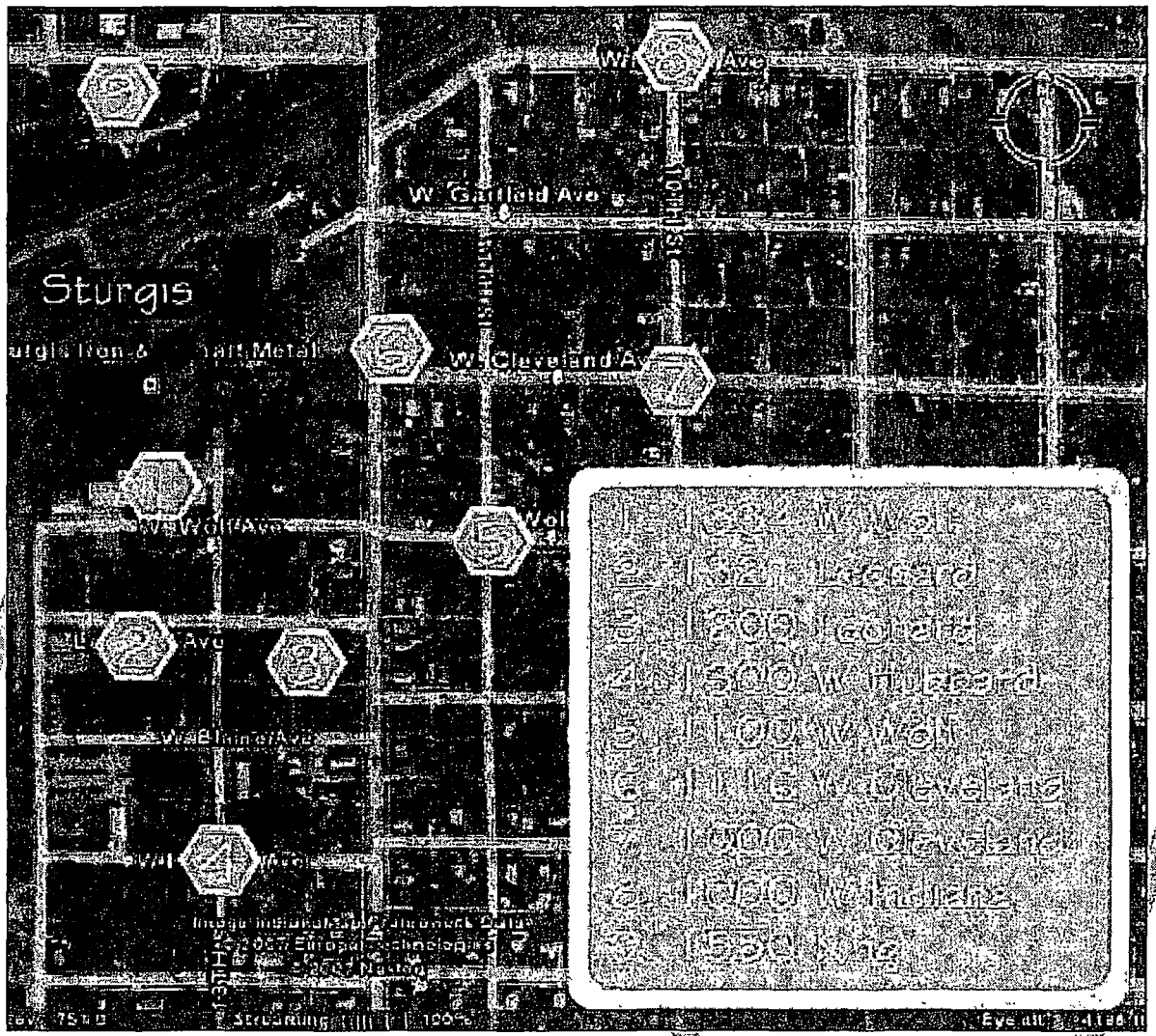


Figure 1: Community Sound Level Monitoring Locations

3.2 Vibration Level Measurement Locations

Vibration level monitoring was performed at 4 locations in the residential community, at 1 location on the Sturgis property, and near the railway that borders the Sturgis property. The data logging vibration meters were attached to residential foundation walls, to the Megga Shredder foundation wall, and, at the railway, to a steel stake driven into the soil of the rail bed. The vibration measurement locations are presented in Figure 2. Vibration level data was collected for 48 hours.

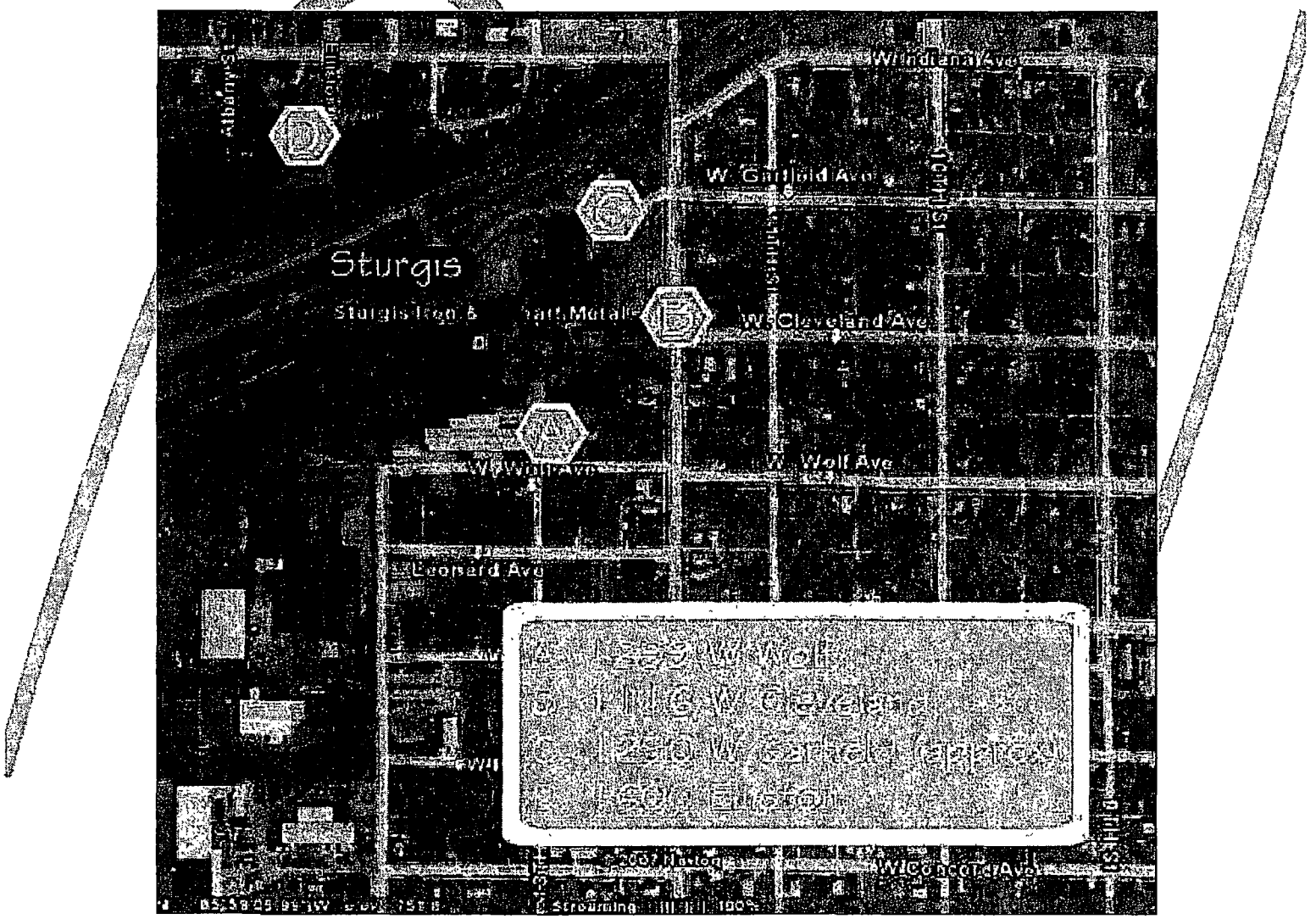


Figure 2: Community Vibration Level Monitoring Locations

3.3 Instrumentation

Larson-Davis Laboratories model 703-PLUS and model 706-RC sound level meters were used for A-weighted measurements. These meters conform to ANSI Standard Specifications for Sound level Meters S1.4-1983, Type 2, and the IEC 651-1979, Sound Level Meters Type 2. The instruments were calibrated and are traceable to the National Institute of Standards. Evidence of traceability is on file at the Larson Davis Corporate Headquarters. The meters were field calibrated before and after the measurement session.

In addition, a Larson-Davis Laboratories model 824 integrating sound level meter and real time analyzer was used to make short duration sound level measurements at the monitoring locations. This meter conforms to ANSI Standard Specifications for Sound level Meters S1.4-1983, Type 1, and the IEC 60804 (1985), Sound Level Meters Type 1. The instrument was calibrated and the calibration is traceable to the National Institute of Standards. Evidence of traceability is on file at the Larson Davis Corporate Headquarters. The meter was field calibrated before and after the measurement session.

Vibration monitoring was performed with Larson-Davis model HVM100 vibration monitors. These monitors measure along all axis of vibration and apply digital filters that conform to the ISO standards for assessing human exposure to vibration. The monitors conform to ISO standards 2631 and 5349.

4. RESULTS & ANALYSIS

4.1 Noise and Vibration Exceedence Criteria

City of Elkhart municipal code section 95.095, *General Noise Regulations*, paragraph A.17, states:

> Any noise that exceeds a noise level of 83 dBA based on a distance from the noise source of not less than 15 feet, or any noise that can be heard more than 50 feet from its source and is inherently obnoxious or patently offensive shall be prima facie evidence of a noise prohibited by division (A) of this section; and (Noise that creates less decibels than 83 dBA from 15 feet also constitutes noise prohibited by division (A) if the noise otherwise constitutes a prohibited noise stated at division (B) of this section. Further, there is not any decibel measurement requirement to prove the existence of a noise prohibited by division (A).

83 dBA has, therefore, been used in this study to determine if a noise level exceedence has occurred.

International Standards Organization standard 2631-1 (ISO 2631-1) states that fifty percent of alert, fit persons can just detect a vibration with a peak magnitude of 0.015 m/s^2. This 0.015 m/s^2

value was used in this study as the exceedence criterion for assessing impact on the residences by vibration.

4.2 Measured Noise Levels

Sound level monitoring was performed from 8/13/2007 through 8/19/2007. There were operations taking place on the Stugis property, either material movement near the Mega Shredder or operation of the Mega Shredder, during the following approximate times on each of those days:

08/13/07: 12:00 (start of monitoring) to 18:00
08/14/07: 06:00 to 19:00
08/15/07: 06:15 to 18:00
08/16/07: 06:00 to 18:30
08/17/07: 06:00 to 19:00
08/18/07: 06:00 to 12:00
08/19/07: no operations

The clocks in all of the sound monitors were synchronized. This allowed the time stamp of the sound level data logged by each monitor to be compared with the time stamp on the other monitors. After collecting all of the data, computer algorithms were used to compare the sound levels logged by the monitors in the community with the sound levels logged by the monitors on the Sturgis property. The algorithms searched the data logged at the monitors in the community for exceedences which corresponded in time to spikes in the sound level logged by the monitors on the Sturgis property. The algorithms accounted for the speed at which sound travels and the distance from the Sturgis property to each sound monitoring location in the community. If the sound level logged by a monitor in the community was greater than 83 dBA and corresponded in time to a spike in the sound level on the Sturgis property, with an appropriate time lag to account for the speed of sound, then that incident was counted as a sound level exceedence and attributed to activity on the Sturgis property.

Table 1 tabulates the number of times that the sound level at each monitoring location exceeded 83 dBA due to a source on the Sturgis property, during the seven days of monitoring. These exceedences were due to impulsive sound events. Each exceedence represents one second of time.

The Table also presents the hourly average sound level, $L_{eq(hr)}$, measured during the daytime, with and without the Mega Shredder operating. Note that the sound level "without" the Mega Shredder operating still includes contributions from movement of scrap material near the Mega Shredder.

Graphs appended to this report show a sample of the data collected at the community sound monitoring locations.

Sound Monitoring Location Number	Number of times sound level[2] exceeded 83 dBA due to activity on Sturgis Property during 7 days of monitoring	Average daytime sound level[3], dBA, with and without Mega Shredder operation (with / without[1])
1	43 exceedences highest level: 90 dBA	74 / 70
2	0	64 / 64
3	0	63 / 61
4	0	61 / 59
5	0	64 / 63
6	34 exceedences highest level: 90 dBA	72 / 70
7	0	64 / 62
8	0	65 / 65
9	0	65 / 65

1. Without Mega Shredder operating but with material movement on Property.
2. Average sound level during 1 second of time, $L_{eq(1\,second)}$.
3. Average hourly sound level, $L_{eq(hr)}$, 8AM to 6PM weekdays.

Table 1: Number of exceedences and average sound level

4.3 Measured Vibration Levels

The peak vibration levels at the four community vibration monitoring locations exceeded the 0.015 m/s^2 criterion 104 times at Location A, 161 at Location B, 560 at Location C, and 22 at Location D. None of these incidents were attributable to operation of the Mega Shredder. The majority of high level vibration incidents are attributable to railway activity, especially at Location C, and other incidents are caused by sources local to the monitoring location, such as street traffic. Vibration levels at the monitoring locations reached (A) 0.051 m/s^2, (B) 0.091 m/s^2, (C) 0.140 m/s^2, and (D) 0.023 m/s^2. There are measurable levels of vibration at the monitoring locations which are attributable to operation of the Mega Shredder, but these levels are below the 0.015 m/s^2 criterion. A graph of the vibration data is presented in the appendices.

4.4 Observations and Analysis

It was our observation that the impulsive sound events, which caused sound levels at the monitoring locations near the Sturgis property to exceed the 83 dBA limit, were due to movement of scrap material on the Sturgis property rather than operation of the Mega Shredder. We also observed that operation of the Mega Shredder itself was easily audible at locations immediately adjacent to the Sturgis property and at locations further from the property, particularly along Cleveland Avenue, which has a direct line of sight to the Mega Shredder. Although sound from the Mega Shredder is not causing the impulsive spikes above the City's 83 dBA criterion, sound from the Mega Shredder is raising the ambient sound level at some of the monitoring locations, as indicated by the difference in the daytime hourly average sound level measured when the Mega Shredder was and was not operating (Table 1).

The one exception, where noise from the Mega Shredder itself caused a sound level exceedence at the community sound monitoring locations, was the explosion which took place within the Mega Shredder on August 14th at approximately 07:21:30 AM. The sound level generated by this explosion was 84 dBA at the 1334 Wolf monitoring location and 83 dBA at the 1116 Cleveland monitoring location. At other monitoring locations within the community the sound level generated by the explosion was well below the 83 dBA exceedence criterion.

The sound level monitoring positions were similar in elevation to the second story windows of the houses in the neighborhood. Placing the monitors at this elevation rather than at a lower elevation, such as five feet above grade, gave the monitors nearest to Sturgis (Locations 1 and 6) a less interrupted line of sight to activities on the property. Positions closer to the ground would have been more shielded from Sturgis's operations by Sturgis's perimeter sound wall. The shielding provided by the sound wall would likely have reduced the number of measured exceedences.

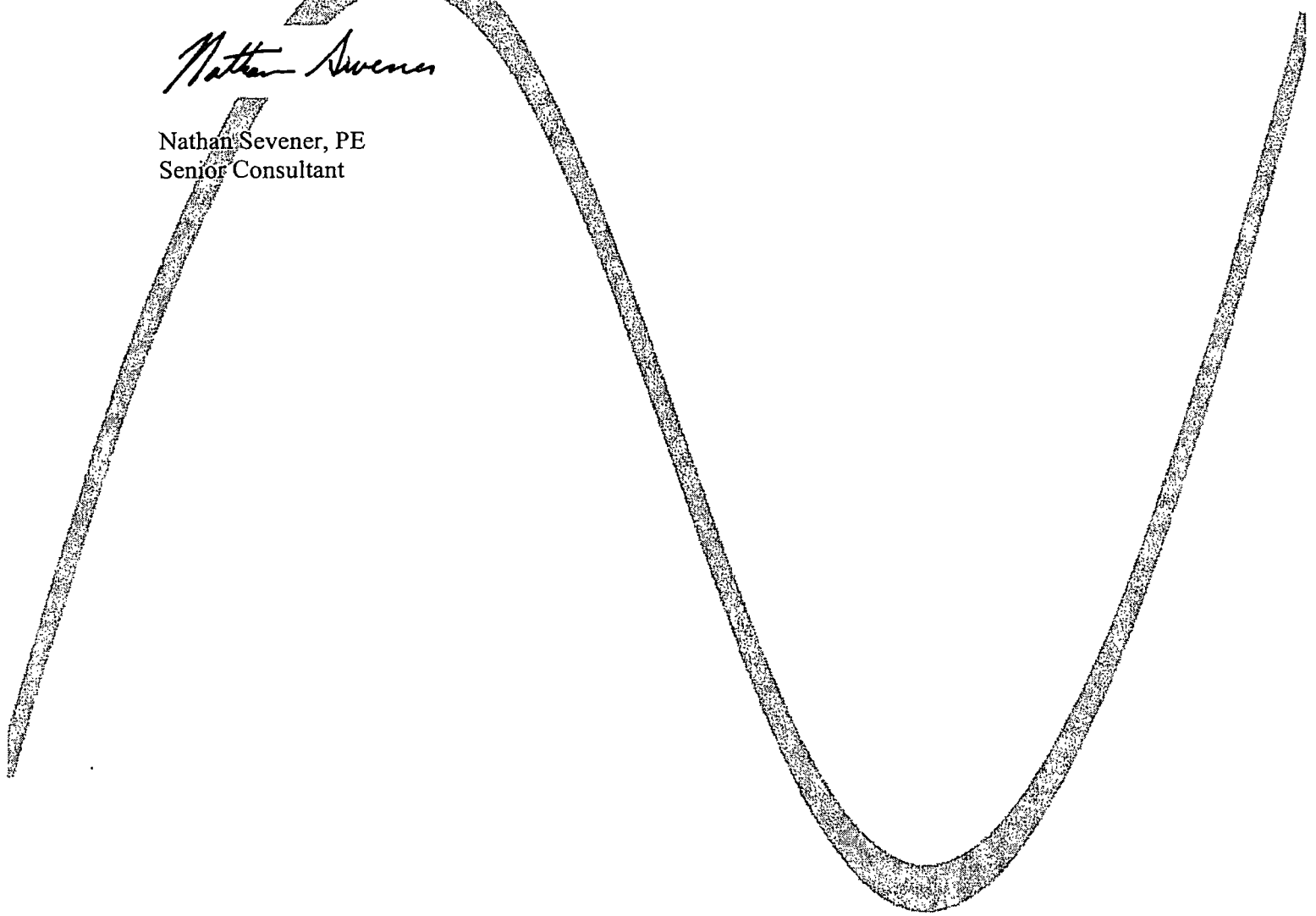
5. CONCLUSIONS

Sound generated by scrap material movement on Sturgis's property exceeds the City of Elkhart criterion of 83 dBA at nearby residential locations. Vibration levels at residential locations routinely exceed the 0.015 m/s^2 criterion, but those vibration events are not attributable to operation of the Mega Shredder. Those vibration events are attributable to railway activity and to sources local to individual monitoring locations, such as street traffic.

This concludes our initial monitoring and assessment of sound and vibration. Please let us know if you require any further clarification of our findings.

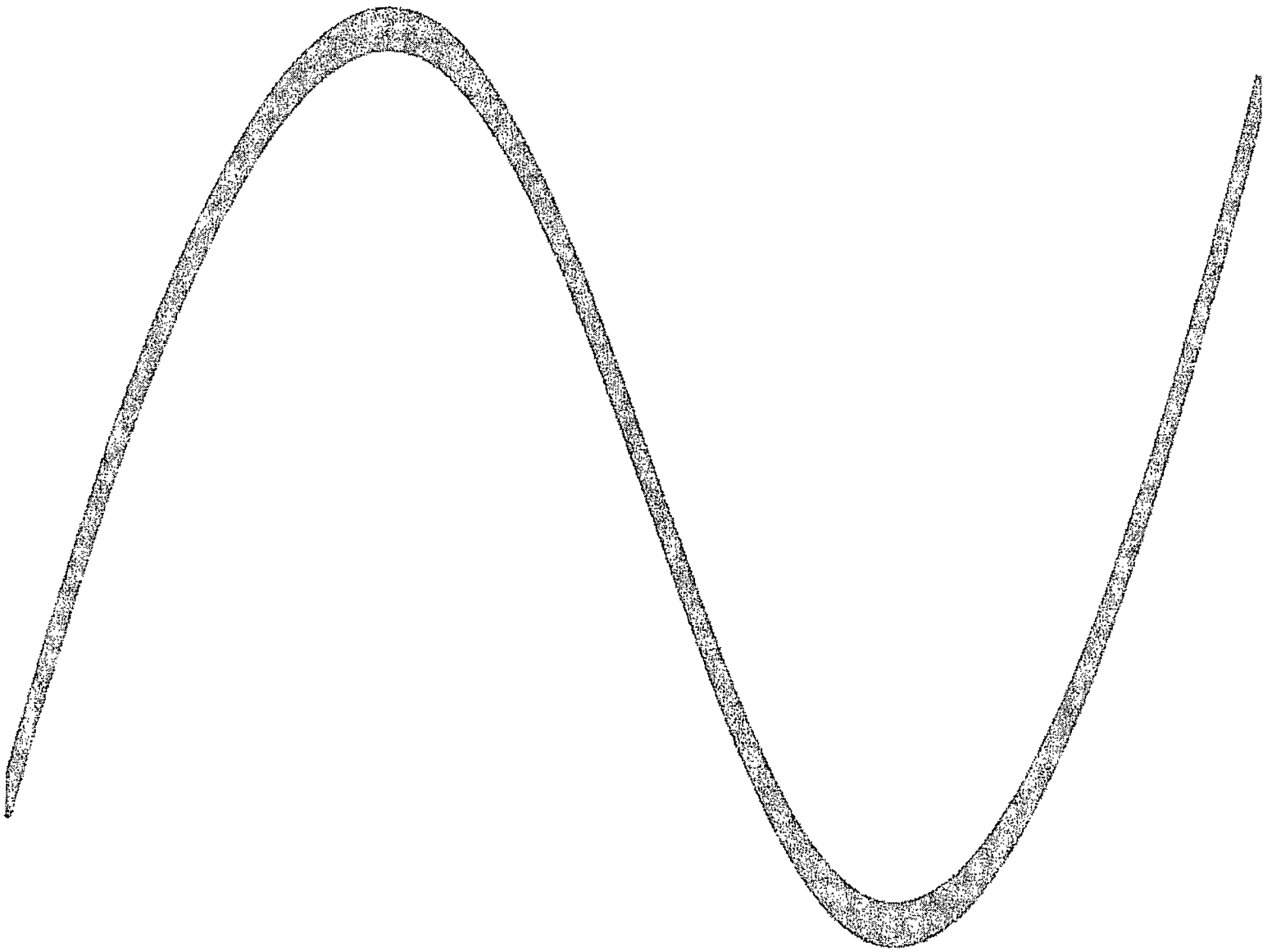
Sincerely,

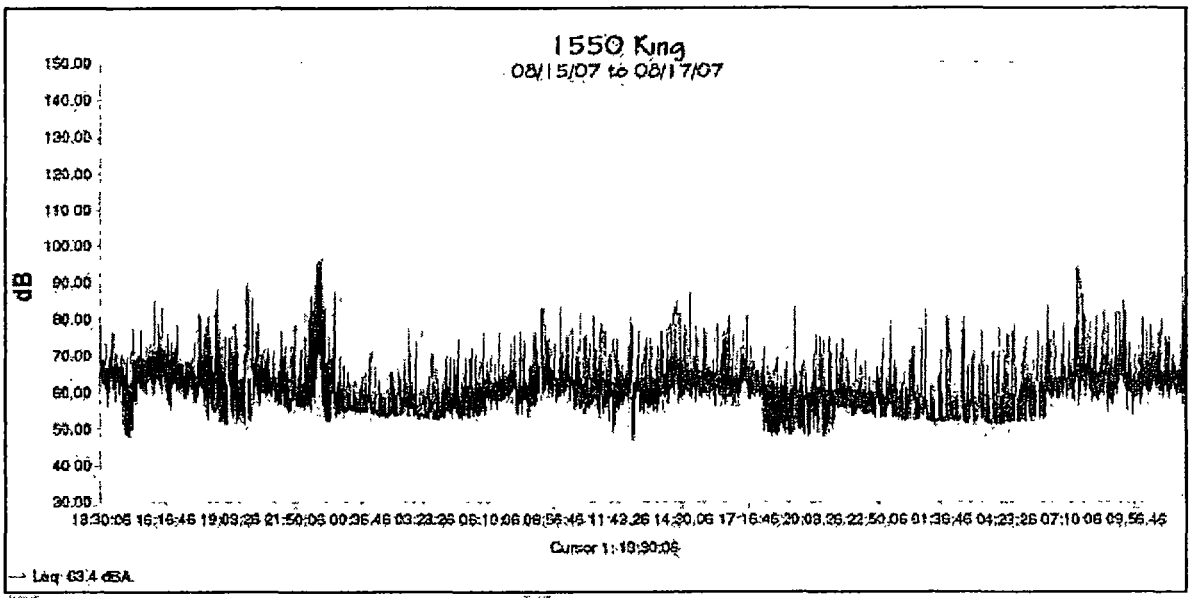
ACOUSTICS BY DESIGN, INC.
Per:

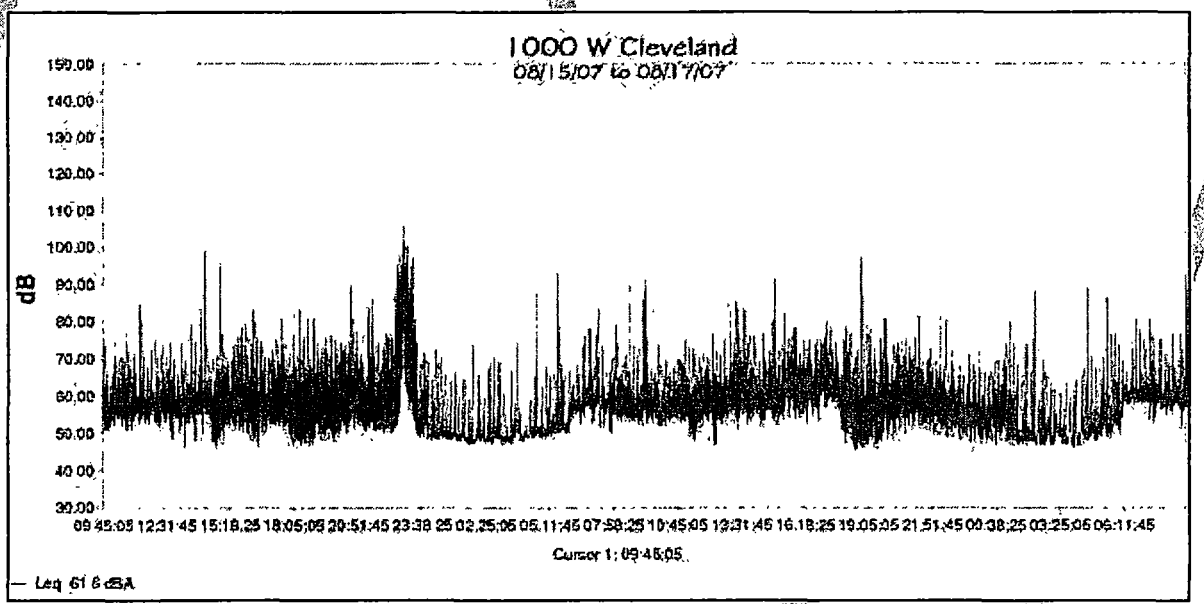


Nathan Sevener, PE
Senior Consultant

Sample Sound Level Data




1550 King
08/15/07 to 08/17/07
dB
150.00
140.00
130.00
120.00
110.00
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
Cursor 1: 19:30:06
Leq 63.4 dBA


1000 W Cleveland
08/15/07 to 08/17/07
dB
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140.00
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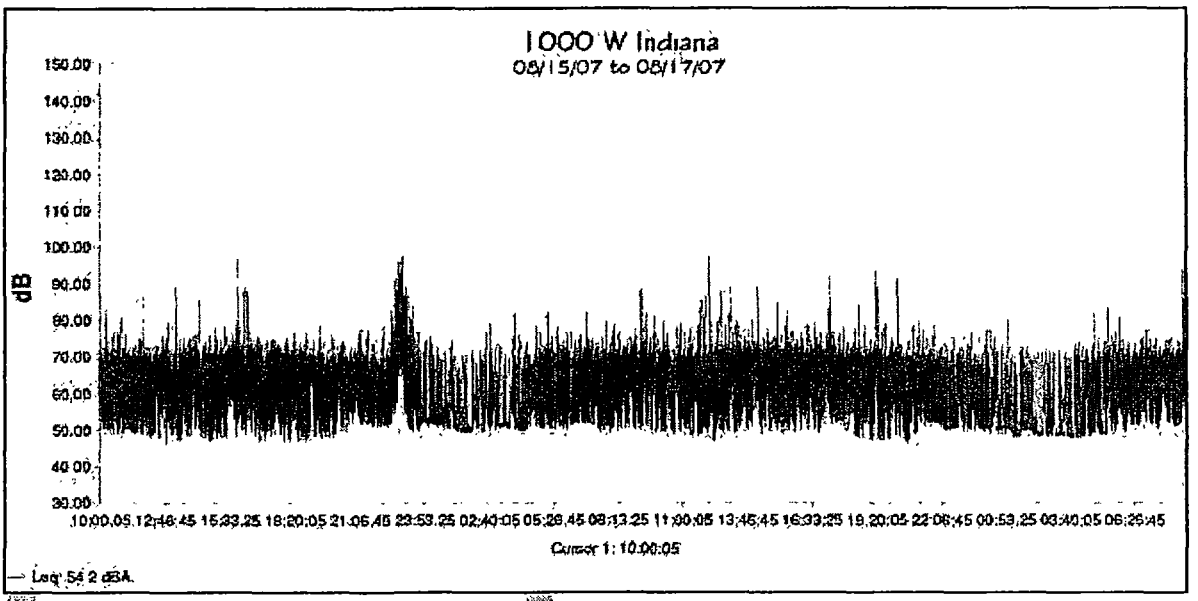
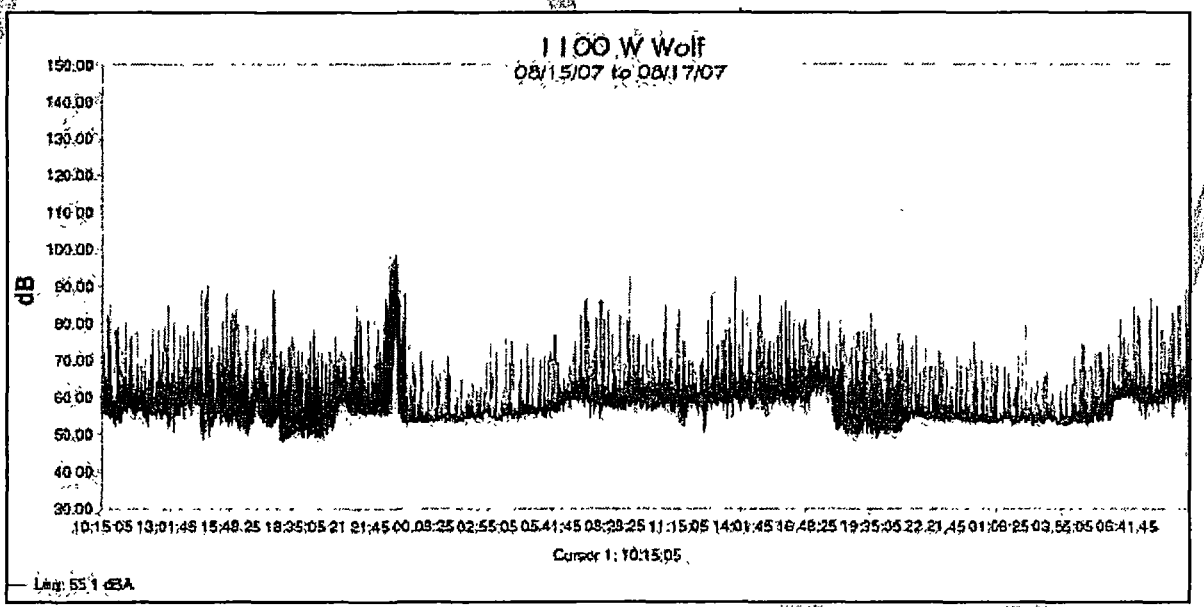
120.00
110.00
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
09:45:05 12:31:45 15:18:25 18:05:05 20:51:45 23:38:25 02:25:05 05:11:45 07:58:25 10:45:05 13:31:45 16:18:25 19:05:05 21:51:45 00:38:25 03:25:05 06:11:45
Cursor 1: 09:45:05
Leq 61.6 dBA


1000 W Indiana
08/15/07 to 08/17/07
dB
150.00
140.00
130.00
120.00
110.00
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
10:00:05 12:46:45 15:33:25 18:20:05 21:06:45 23:53:25 02:40:05 05:26:45 08:13:25 11:00:05 13:46:45 16:33:25 19:20:05 22:06:45 00:53:25 03:40:05 06:26:45
Cursor 1: 10:00:05
Leq: 54.2 dBA


1100 W Wolf
08/15/07 to 08/17/07
dB
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140.00
130.00
120.00
110.00
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
10:15:05 13:01:45 15:48:25 18:35:05 21:21:45 00:08:25 02:55:05 05:41:45 08:28:25 11:15:05 14:01:45 16:48:25 19:35:05 22:21:45 01:08:25 03:55:05 06:41:45
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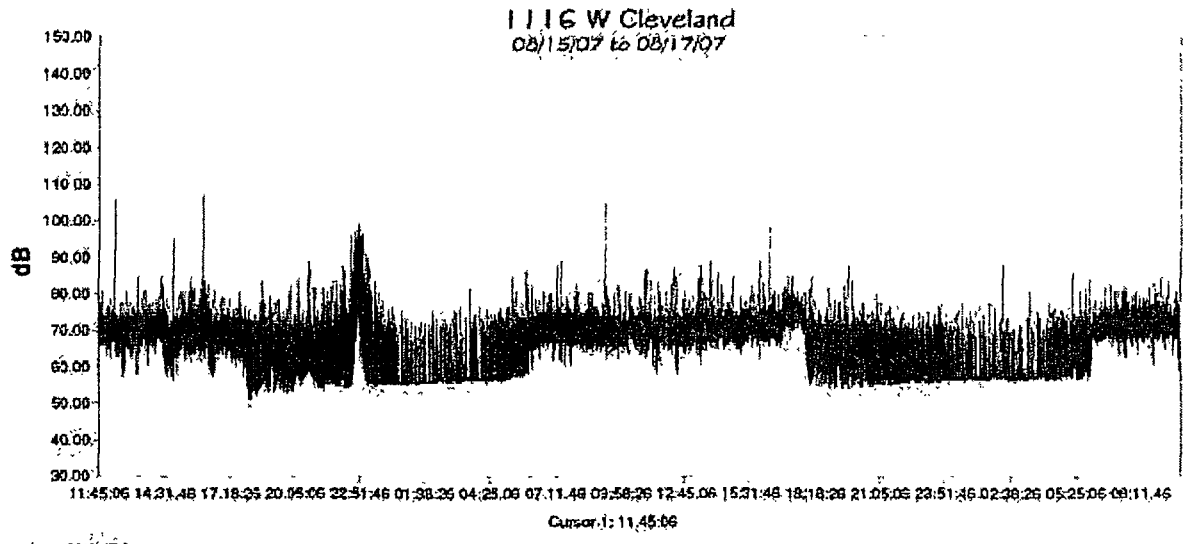
Leq: 55.1 dBA


1116 W Cleveland
08/15/07 to 08/17/07
dB
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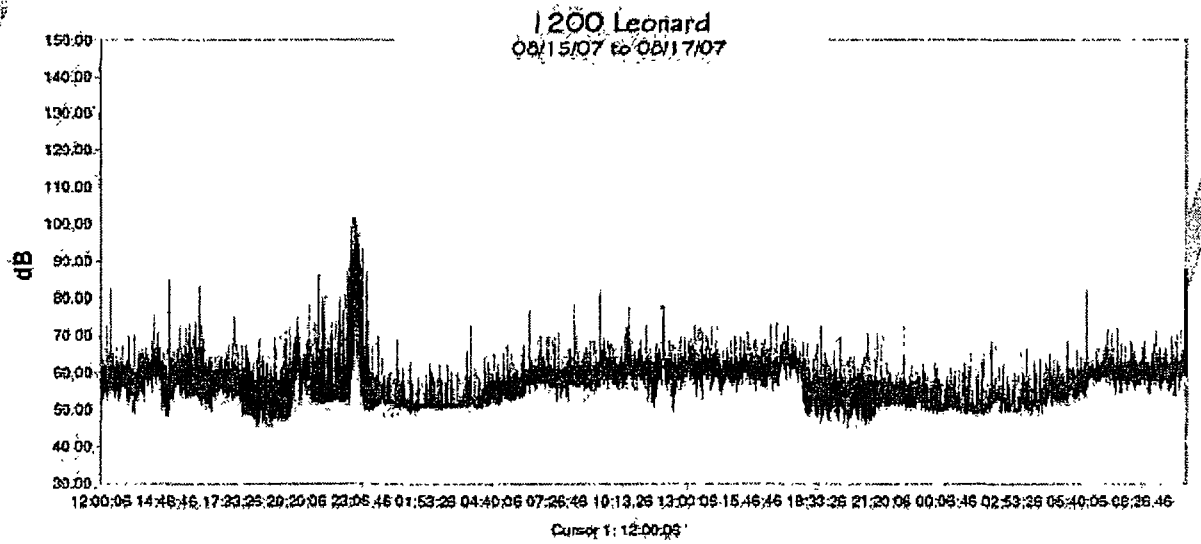
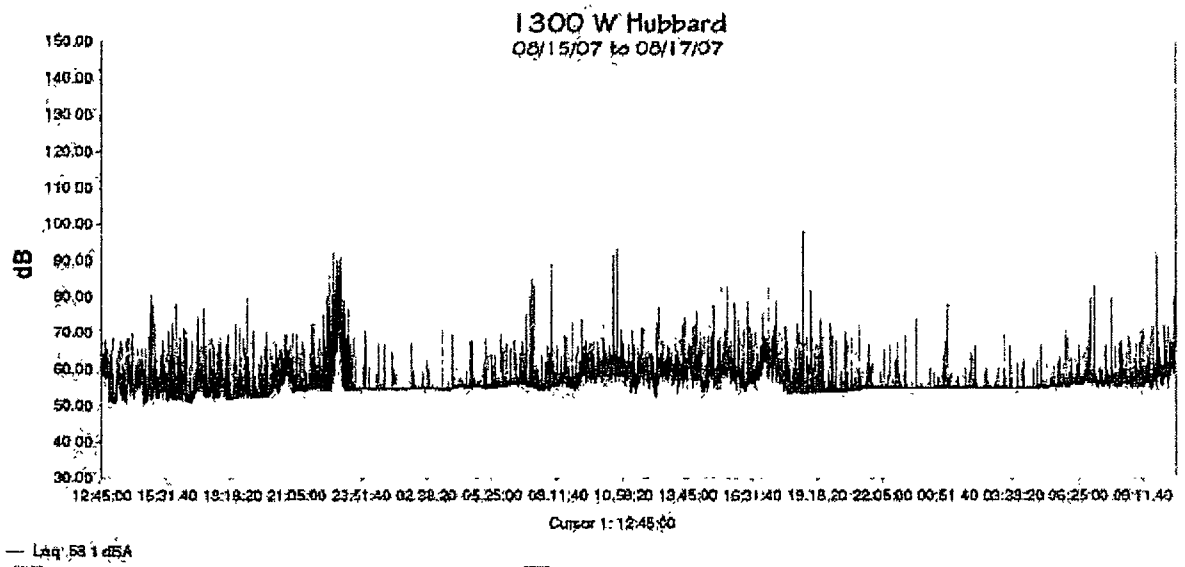
140.00
130.00
120.00
110.00
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
11:45:06 14:31:46 17:18:26 20:05:06 22:51:46 01:38:26 04:25:06 07:11:46 09:58:26 12:45:06 15:31:46 18:18:26 21:05:06 23:51:46 02:38:26 05:25:06 08:11:46
Cursor 1: 11:45:06
Leq 66.0 dBA


1200 Leonard
08/15/07 to 08/17/07
dB
150.00
140.00
130.00
120.00
110.00
100.00
90.00
80.00
70.00
60.00
50.00
40.00
30.00
12:00:06 14:46:46 17:33:26 20:20:06 23:06:46 01:53:26 04:40:06 07:26:46 10:13:26 13:00:06 15:46:46 18:33:26 21:20:06 00:06:46 02:53:26 05:40:06 08:26:46
Cursor 1: 12:00:06
Leq 59.7 dBA


1300 W Hubbard
08/15/07 to 08/17/07
dB
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140.00
130.00
120.00
110.00
100.00
90.00
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70.00
60.00
50.00
40.00
30.00
12:45:00 15:31:40 18:18:20 21:05:00 23:51:40 02:38:20 05:25:00 08:11:40 10:58:20 13:45:00 16:31:40 19:18:20 22:05:00 00:51:40 03:38:20 06:25:00 09:11:40
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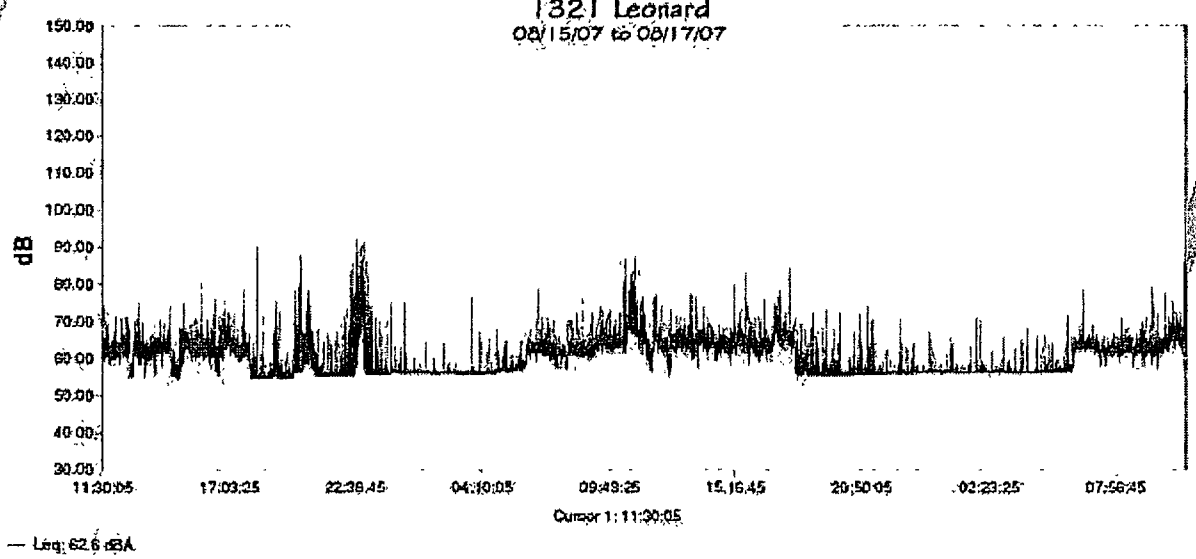
Leq: 58.1 dBA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08/15/07 to 08/17/07
dB
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130.00
120.00
110.00
100.00
90.00
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60.00
50.00
40.00
30.00
11:30:05 17:03:25 22:36:45 04:10:05 09:43:25 15:16:45 20:50:05 02:23:25 07:56:45
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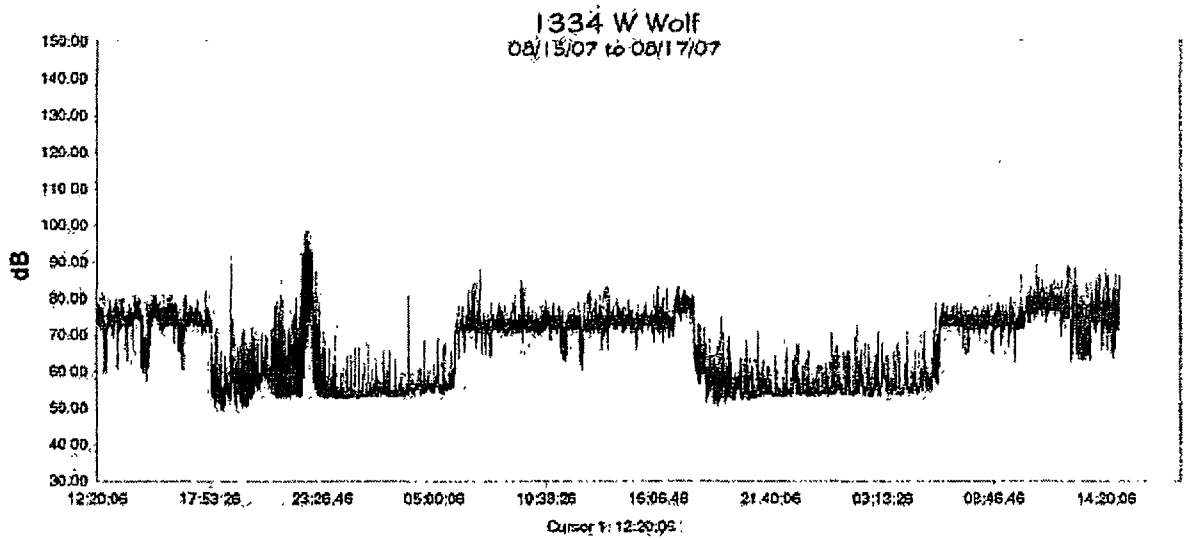
1334 W Wolf
08/15/07 to 08/17/07
dB
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140.00
130.00
120.00
110.00
100.00
90.00
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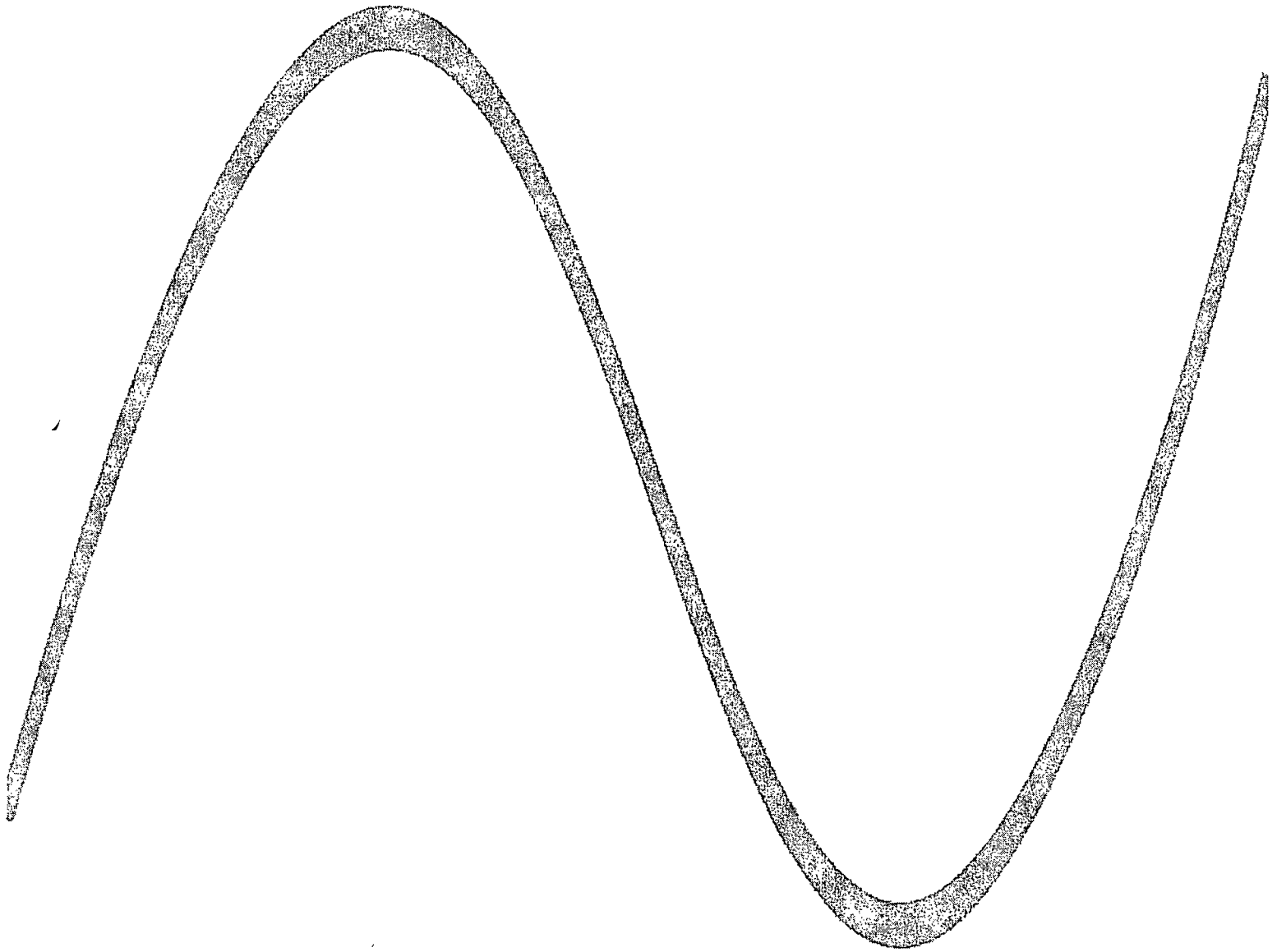
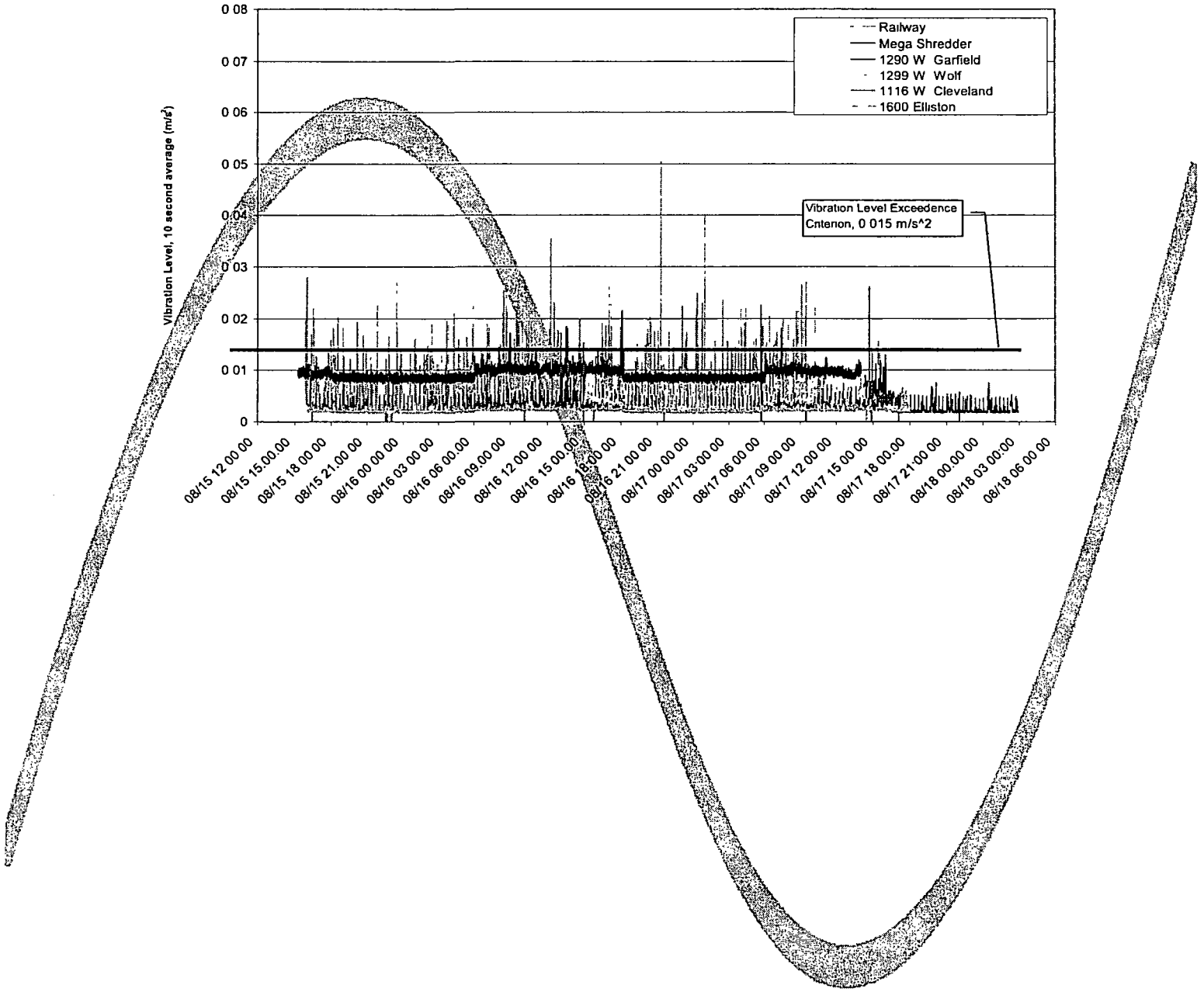
40.00
30.00
12:20:06
17:53:26
23:26:46
05:00:06
10:33:26
16:06:46
21:40:06
03:13:26
08:46:46
14:20:06
Cursor 1: 12:20:06
Leq: 75.4 dBA

Vibration Data



Measured Vibration Levels



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Environmental
Resources
Management

3352 128th Avenue
Holland, MI 49424-9263
(616) 399-3500
(616) 399-3777 (fax)
http://www.erm.com

4 August 2004

Mr. John R. Dresser, Esq.
Dresser, Dresser, Haas & Caywood, P.C.
112 South Monroe Street
Sturgis, Michigan 49091

Re: Site Investigation Summary Report
Patrick Paint, 1819 South 14th Street, Elkhart, Indiana

Dear Mr. Dresser:

Environmental Resources Management, Inc. (ERM) performed a site investigation of the above-referenced property consistent with our 23 June 2004 proposal. The objective of the investigation was to obtain site characterization information to assist Sturgis Iron & Metal Co., Inc. (SIM) in its purchase decision. Following is a discussion of the scope of the investigation, investigation methodology, data evaluation, and conclusions.

SCOPE OF INVESTIGATION

Based upon ERM's review of a 3 March 2000 *Phase I Environmental Site Assessment and Limited Compliance Review* prepared by ATC Associates, Inc., ERM selected sampling locations in areas of potential environmental concern. The targeted investigation areas and the borings that addressed these areas are presented in the following table (see Figure 1 in Attachment A for sample locations).

Area of Potential Concern	Boring(s)
Former Roll-Off Hopper (waste paints, solvents)	SB-9, SB-10
Former Outdoor Drum Storage	SB-11, SB-12
Empty Drum Storage Area	SB-3
Discharge Pipes/Depression	NA-groundwater sample only
Paint Room	SB-5, SB-6
Former Wastewater Treatment	SB-4
Wastewater Sludge Storage	SB-16
Waste Caustic Storage	SB-7
Hazardous Waste Storage	SB-7, SB-8
Flammables Building	SB-15
Former Waste Storage	SB-13, SB-14
Former Fuel Oil Tank	SB-2
Stressed Vegetation Area (non-specific)	SB-1
Waste Lubricating Oil/General Storage Area	SB-17

Note: Soil samples from SB-8, -9, -11 and -13 were not submitted for lab analysis

As proposed, at several locations, multiple borings were conducted to increase the probability of locating the areas of concern since precise location information was not available. Soil samples were screened to determine the possible "worst-case" sample for lab analysis from each particular area. Consequently, not all borings had samples collected for laboratory analysis (i.e., soil samples not submitted for analysis include SB-8 at the hazardous waste storage area, SB-9 at the former rolloff area, SB-11 at the former outdoor drum storage area, and SB-13 at the former waste storage area).

Groundwater samples were collected at six locations: TW-1 and TW-2 at the estimated "downgradient" side of the property; TW-3 at the empty drum storage area; TW-4 at the former rolloff storage area and "upgradient" side of the property; TW-5 at the drainage/outfall area; and TW-6 at the northwest side of the property.

INVESTIGATION METHODOLOGY

Borings were advanced with a Geoprobe® drill rig by Paramount Environmental Services of Portage, Indiana. Soil samples were collected continuously for geologic logging and screening with an iso butylene-calibrated photoionization detector (PID). The PID is capable of detecting volatile organic compounds (VOCs), albeit at a higher detection limit than in a laboratory analysis. PID readings were used to select the sample interval for laboratory-analyzed samples. Groundwater samples were collected from temporary wells set within the upper three feet of the water table, which was present at a depth of 15 feet below the natural grade of the site. Boring logs with field observations are presented in Attachment C.

Since there were no indications of potential contamination based on field screening of soil samples (PID readings were all 1 part per million/ppm or less and no visual indications such as staining were noted), all samples selected for laboratory analysis were from 0'-1' below grade, with the exception of SB-17. A coarser rust-colored sand was noted in SB-17 from 3' to 4' below grade, although no indications of contamination were observed. Soils encountered in borings conducted at the site consisted of fine and medium tan sands. At many locations, a trace of black sand/coal fragments was noted just beneath the surface. At SB-1, dried paint residue was noted to a depth of 1 foot beneath the asphalt-paved lot.

Samples collected for laboratory analysis were placed in clean, labeled jars and an iced cooler and transported to e-Lab of Holland, Michigan for analysis under chain-of-custody. Analytical parameters were selected based upon the following rationale:

- Volatile Organic Compounds – associated with solvent, petroleum hydrocarbon and paint usage;
- Polynuclear Aromatic Hydrocarbons (PAHs) – associated with petroleum hydrocarbons and former coal storage;
- Metals – associated with paint wastes, wastewater treatment, electroplating;
- Cyanide – associated with electroplating;
- Polychlorinated Biphenyls (PCBs) – associated with various industrial uses, transformers and other electrical equipment, waste oils, certain paint formulations.

All sampling and analytical methodologies were consistent with U.S. EPA and Indiana Department of Environmental Management (IDEM) protocol.

ANALYTICAL RESULTS

Analytical results are compared to Risk Integrated System of Closures (RISC) cleanup criteria generated by IDEM dated 1 January 2004. Cleanup criteria have been developed for residential and industrial/commercial land uses. The results in Tables 1 (soil) and 2 (groundwater) compare the analytical data for samples collected to both the default residential and industrial closure levels (Attachment B). Residential levels are presented for comparative purposes to levels safe for unrestricted (i.e., residential) land use. The industrial levels are presented for comparative purposes to levels safe for industrial land use. Comparison to residential criteria is made since these are the levels above which a property could be considered contaminated. The laboratory report is included in Attachment D.

Soil Data Evaluation

Exceedances of criteria (residential and/or industrial) were noted in SB-1, SB-3, SB-4, SB-12, SB-14, and SB-17. PCB data is not presented in Table 1 since none were detected.

SB-1: indications of paint waste were noted in this boring just beneath the surface; the metals arsenic, cadmium, hexavalent chromium, lead and zinc were detected above criteria;

SB-3: this boring was conducted in the former empty drum storage area; arsenic, lead and naphthalene were detected above criteria; none, however, exceeded industrial criteria;

SB-4: this boring was conducted in the former wastewater treatment area; arsenic was detected above criteria; however, the level was below industrial criteria;

SB-12: this boring was conducted in the former drum storage area; arsenic, benzene, benzo(a)pyrene and dibenzo(a,h)anthracene were detected above criteria; other hydrocarbons (VOCs and PAHs) were also detected but at levels below residential criteria;

SB-14: this boring was conducted in the former waste storage area; arsenic, trichloroethylene (TCE), and benzo(a)pyrene were detected above criteria; and

SB-17: this boring was conducted in the former oil storage area; lead and TCE were detected above criteria.

Groundwater Data Evaluation

As indicated in Table 2, exceedances of criteria (residential and/or industrial) were noted in TW-4 and TW-6. The common industrial solvents TCE and tetrachloroethylene (PCE) were detected in these groundwater samples (TCE only in TW-4). Metals and PAHs were not detected in groundwater at concentrations exceeding the criteria, which indicates that these soils containing these parameters are not leaching through the soil column to underlying groundwater to a significant degree (due in part to the presence of the building/pavement).

CONCLUSIONS

Following are ERM's conclusions from the site investigation:

1. Groundwater is contaminated with trichloroethylene (TCE), a common industrial solvent and degreaser. TCE was detected at TW-4 and TW-6. Some or all of the TCE could be migrating onto the property from an upgradient site (estimated groundwater flow

direction is northerly). Another common industrial solvent tetrachloroethylene was also detected in TW-6 at concentrations above criteria, and since this compound was not detected in TW-4, it may have been released on the subject property.

2. Soil samples collected from the subject property indicate TCE and benzene are present at concentrations exceeding criteria at several locations. The data suggests releases occurred to soil in the former waste storage area (SB-14), waste lubricating oil/ general storage area (SB-17), outside drum storage areas (SB-3 and -12), and the former waste dumpster area (SB-10/TW-4). Several metals and PAH compounds were also detected. Evidence of paint solids was noted in SB-1, where elevated metals were detected. No other waste materials or evidence of spills/releases were noted by ERM.

3. Although response activities (i.e., actions undertaken to reduce the contaminant concentrations and/or exposure risks) would be necessary to address the identified contaminants to levels that would require no further action by IDEM, there does not appear to be any current unacceptable risk for industrial use of the property. This is based upon the asphalt cover at SB-1 where direct contact risk levels are exceeded, the lack of groundwater use/consumption, and the lack of a threat to indoor air from volatilization of subsurface VOC-impacted soils. However, the source of the VOC impact has not been defined and higher concentrations may be present. Further investigation would be necessary to determine the necessary response activities to meet the IDEM cleanup criteria.

Please feel free to contact me at (616) 738-7340 if you have any questions regarding the proposed work. We appreciate the opportunity to be of service to you.

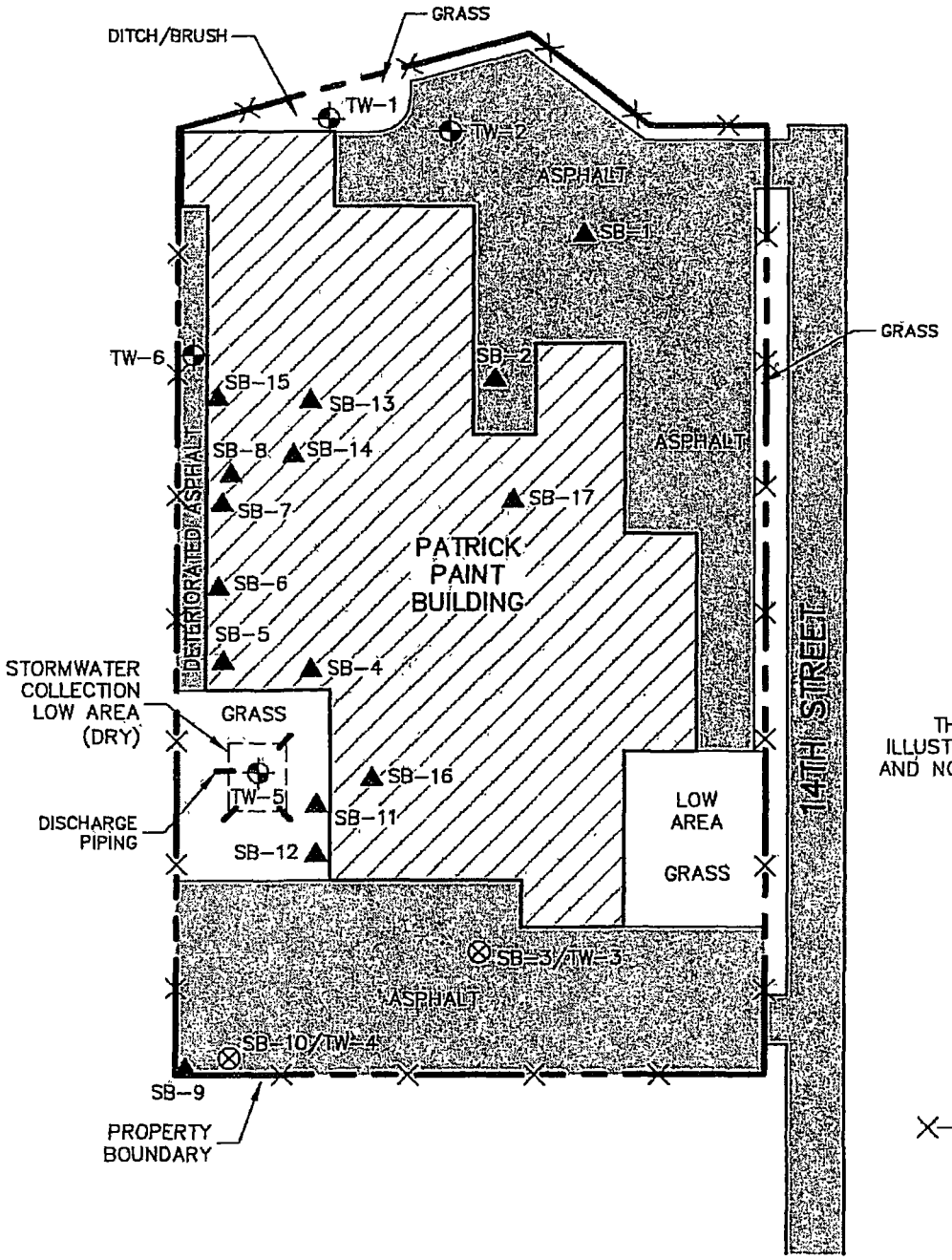
Sincerely,

Thomas P. O'Connell, P.E.
Principal-in-Charge

TPO:rmv
cc: File

Attachment A
Figure 1

SITE MAP WITH SAMPLING LOCATIONS



R:\CADD\Cln\Q-T\Sturgis Iron and Metal\0019369\0019369-01.dwg, Layout1, 7/23/2004 12:17:19 PM

FAK 7/12/04	**STURGIS IRON AND METAL CO.**	CADD Review RMK
ERM	PATRICK PAINT SITE	CHK'D
	1819 14TH STREET, ELKHART, INDIANA	0019369
	Environmental Resources Management	FIGURE 1

Attachment B
Tables

Table 1 Soil Analytical Data Summary
Patrick Paint Site, 1819 14th Street, Elkhart, Indiana

DRAFT

Analyte	RISC Default Industrial Closure Levels(A)	RISC Default Residential Closure Levels(A)	SB-1 (0-1') 07/07/2004	SB-2 (0-1') 07/07/2004	SB-3 (0-1') 07/07/2004	SB-4 (0-1') 07/07/2004	SB-5 (0-1') 07/07/2004	SB-6 (0-1') 07/07/2004	SB-7 (0-1') 07/07/2004	SB-10 (0-1') 07/07/2004	SB-12 (0-1') 07/08/2004	SB-14 (0-1') 07/08/2004	SB-15 (0-1') 07/08/2004	SB-16 (0-1') 07/08/2004	SB-17 (3-4') 07/08/2004
Metals (mg/kg):															
Aluminum	NA	NA	8,900	3,900	8,400	7,800	5,000	5,900	5,500	6,100	4,200	5,800	5,500	6,200	5,200
Arsenic	20	3.9	108	2.5	8.2	5.1	2.1	2.5	2.5	2.2	12	4.1	3.1	3.1	3.3
Cadmium	77	7.5	8.4	0.16	1.80	0.08	0.11	0.41	0.07	0.44	0.92	0.49	0.09	0.45	0.53
Chromium, Hexavalent	120	38	56	0.61	2.2	< 0.53	1.0	2.1	0.74	0.69	1.3	1.4	4.9	0.87	1.9
Chromium, Trivalent	10,000	10,000	< 0.59	9.3	14	17	14	11	6.7	8.1	5.0	10	0.8	6.5	24
Copper	2,700	920	24	9.6	42	12	8.2	32	11	150	30	130	4.6	26	18
Lead	230	81	700	17	100	8.1	23	23	6.6	75	48	68	6.9	37	100
Magnesium	NA	NA	4,600	3,600	710	1,300	1,300	2,100	3,100	7,000	3,000	3,000	2,900	3,900	5,700
Mercury	32	2.1	0.08	0.02	0.10	< 0.011	0.02	< 0.0092	< 0.016	0.01	0.03	0.07	0.02	0.05	0.03
Nickel	2,700	950	32	7.50	13	11	21	8.1	9.3	10	9.2	36	7.7	7.8	9.8
Silver	87	31	< 0.27	< 0.25	< 0.26	< 0.23	< 0.24	< 0.23	< 0.22	< 0.23	< 0.24	< 0.24	< 0.24	< 0.23	0.45
Zinc	10,000	10,000	14,000	< 0.51	< 0.53	< 0.45	< 0.48	< 0.46	< 0.45	< 0.45	< 0.48	< 0.49	< 0.49	< 0.45	< 0.47
VOCs (ug/kg):															
Benzene	350	34	< 54	< 43	< 57	< 43	< 43	< 44	< 43	< 43	970	< 46	< 42	< 48	< 44
Chloroform	1,200	470	< 54	< 43	< 57	< 43	< 43	< 44	< 43	< 43	96	< 46	< 42	< 48	< 44
Ethylbenzene	160,000	13,000	< 54	< 43	< 57	< 43	< 43	58	< 43	< 43	210	< 46	< 42	< 48	< 44
m,p-Xylene	NA	NA	< 80	< 64	< 86	< 64	< 65	< 66	< 64	< 65	950	< 69	< 63	< 72	< 66
o-Xylene	NA	NA	< 54	< 43	69	< 43	< 43	98	< 43	< 43	800	70	< 42	< 48	< 44
Toluene	240,000	12,000	< 54	< 43	< 57	< 43	< 43	< 44	< 43	< 43	2,000	75	< 42	< 48	58
Trichloroethene	82	57	< 54	< 43	< 57	< 43	< 43	< 44	< 43	< 43	< 44	2,700	< 42	< 48	310
Xylenes, Total	170,000	170,000	< 120	< 96	< 130	< 96	< 97	< 99	< 97	< 97	1,700	< 100	< 95	< 110	< 98
PAHs (ug/kg):															
Acenaphthene	1,200,000	130,000	17	< 5.0	34	< 5.4	< 4.9	< 5.5	< 5.5	11	380	67	6	< 5.5	27
Acenaphthylene	180,000	18,000	< 35	< 15	39	< 16	< 15	< 16	< 17	30	89	67	< 15	< 16	40
Anthracene	51,000	51,000	130	< 10	130	< 11	< 9.8	< 11	< 11	33	2,100	310	< 9.9	51	140
Benzo(a)anthracene	15,000	5,000	750	29	220	< 11	160	36	130	150	2,800	1,500	66	140	310
Benzo(a)pyrene	1,500	500	400	31	190	< 11	90	74	100	240	1,900	950	< 49	55	230
Benzo(b-k)fluoranthene[1]	15,000	5,000	430	65	410	< 22	150	120	110	500	3,600	1,400	< 99	100	500
Benzo(g,h,i)perylene	16,000	16,000	140	21	70	< 11	55	18	25	77	1,500	420	< 49	34	130
Chrysene	25,000	25,000	360	22	45	< 5.4	< 4.9	40	30	< 5.5	< 5.6	< 5.1	100	15	250
Dibenzo(a,h)anthracene	1,500	500	< 120	< 10	41	< 11	18	< 11	< 11	41	640	360	< 49	17	65
Fluoranthene	880,000	880,000	240	32	640	< 16	94	47	53	180	6,200	1,800	38	140	390
Fluorene	1,100,000	170,000	35	< 10	32	< 11	< 9.8	< 11	13	19	380	90	11	18	33
Indeno(1,2,3-cd)pyrene	3,100	3,100	130	18	74	< 11	46	18	21	90	1,700	710	< 49	31	150
2-Methylnaphthalene	210,000	16,000	200	39	1,100	< 11	< 9.8	34	12	28	390	190	11	82	110
Naphthalene	170,000	700	110	90	1,200	< 16	< 15	18	< 17	23	450	160	< 15	31	120
Phenanthrene	170,000	13,000	450	47	540	< 27	61	90	89	280	2,900	960	49	230	500
Pyrene	570,000	570,000	1,100	50	270	< 16	220	70	93	310	3,800	1,900	< 74	83	390
Cyanide(mg/kg)															
Total[2]	96	0.94	< 0.59	< 0.53	< 0.57	< 0.53	< 0.50	< 0.52	< 0.54	< 0.51	< 0.53	< 0.53	< 0.53	< 0.52	< 0.53

Notes:

For simplification, only compounds detected at one or more locations are shown on this table. For full list of compounds analyzed see laboratory analytical reports.

(A) - From RISC Technical Guide Table A--Default Closure Table--January 1, 2004

Shaded Values Exceed RISC Default Residential Closure Levels

Red-text values exceed RIS Default Industrial Closure Levels

1 Closure Levels are for Benzo(b)fluoranthene, results are for Benzo(b+k)fluoranthene

2 Closure Levels are for Free Cyanide, Sample results are for Total Cyanide.

NA - Criteria Not Available

Table 2 Groundwater Analytical Data Summary
Patrick Paint Site, 1819 14th Street, Elkhart, Indiana

DRAFT

Analyte	RISC Default Industrial Closure Levels (A)	RISC Default Residential Closure Levels (A)	TW-1 (11-16') 07/08/2004	TW-2 (15-16') 07/07/2004	TW-3 (14.5-19') 07/07/2004	TW-4 (15-18') 07/07/2004	TW-5 (9.5-12') 07/08/2004	TW-6 (15-18') 07/08/2004
Metals (mg/L)								
Chromium[1]	0.31	0.10	< 0.0020	0 0026	< 0.0020	< 0 0020	< 0 0020	< 0.0020
Copper	3 8	1.30	< 0.0010	0.0052	0.0013	0 0014	0.003	0 002
Cyanide, Total[2]	2.0	0.20	0 013	0.0078	< 0.0050	0.025	< 0.0050	< 0 0050
Magnesium	NA	NA	13	18	19	17	8 8	23
Nickel	2.0	0 73	0 031	< 0 025	< 0 025	< 0.025	< 0.025	< 0.025
VOCs (ug/L)								
Tetrachloroethene	55	5 0	< 1 0	< 1 0	< 1 0	< 1.0	< 1 0	7.4
Trichloroethene	7.2	5 0	< 1 0	< 1.0	< 1.0	21	< 1.0	9 7
PAHs (ug/L)								
Acenaphthene	4,200	460	< 0.25	6 9	< 0.25	< 0.25	< 0.25	< 0.26
Fluoranthene	210	210	< 0.50	6 7	< 0 50	< 0.50	< 0.50	< 0.51
Cyanide(mg/L)								
Total[2]	2.0	0 20	0 013	0 0078	< 0.0050	0.025	< 0 0050	< 0 0050

Notes:
For simplification, only compounds detected at one or more locations are shown on this table. For full list of compounds analyzed see laboratory analytical reports.
(A) - From RISC Technical Guide Table A--Default Closure Table--January 1, 2004.
1 Closure Levels are for Hexavalent Chromium, Sample results are for total Chromium
2 Closure Levels are for Free Cyanide, Sample results are for Total Cyanide
Shaded Values Exceed RISC Default Residential Closure Levels
Red text values exceed RIS Default Industrial Closure Levels
NA - Criteria Not Available

Attachment C
Soil Boring Logs

Attachment D
Lab Report

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-1 (11-16')
Work Order:	0407134	**Collection Date:**	7/8/2004 4:10:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-01	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
MERCURY BY CVAA		**EPA 7470**			Prep Date: **7/12/2004**	Analyst: **JDA**
Mercury	ND	0.00020		mg/L	1	7/12/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			Prep Date: **7/17/2004**	Analyst: **RM**
Aluminum	ND	0.050		mg/L	1	7/17/2004 9:19:00 PM
Arsenic	ND	0.0010		mg/L	1	7/17/2004 9:19:00 PM
Cadmium	ND	0.00020		mg/L	1	7/17/2004 9:19:00 PM
Chromium	ND	0.0020		mg/L	1	7/17/2004 9:19:00 PM
Copper	ND	0.0010		mg/L	1	7/17/2004 9:19:00 PM
Lead	ND	0.0010		mg/L	1	7/17/2004 9:19:00 PM
Magnesium	13	0.10		mg/L	1	7/17/2004 9:19:00 PM
Nickel	0.031	0.025		mg/L	1	7/17/2004 9:19:00 PM
Silver	ND	0.00050		mg/L	1	7/17/2004 9:19:00 PM
Zinc	ND	0.010		mg/L	1	7/17/2004 9:19:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	ND	0.25		µg/L	1	7/15/2004 10:43:00 PM
Acenaphthene	ND	0.25		µg/L	1	7/15/2004 10:43:00 PM
Acenaphthylene	ND	0.50		µg/L	1	7/15/2004 10:43:00 PM
Anthracene	ND	0.25		µg/L	1	7/15/2004 10:43:00 PM
Benzo(a)anthracene	ND	0.25		µg/L	1	7/15/2004 10:43:00 PM
Benzo(a)pyrene	ND	0.25		µg/L	1	7/15/2004 10:43:00 PM
Benzo(b-k)fluoranthene	ND	0.25		µg/L	1	7/15/2004 10:43:00 PM
Benzo(g,h,i)perylene	ND	0.25		µg/L	1	7/15/2004 10:43:00 PM
Chrysene	ND	0.50		µg/L	1	7/15/2004 10:43:00 PM
Dibenzo(a,h)anthracene	ND	0.25		µg/L	1	7/15/2004 10:43:00 PM
Fluoranthene	ND	0.50		µg/L	1	7/15/2004 10:43:00 PM
Fluorene	ND	0.50		µg/L	1	7/15/2004 10:43:00 PM
Indeno(1,2,3-cd)pyrene	ND	0.25		µg/L	1	7/15/2004 10:43:00 PM
Naphthalene	ND	0.50		µg/L	1	7/15/2004 10:43:00 PM
Phenanthrene	ND	1.0		µg/L	1	7/15/2004 10:43:00 PM
Pyrene	ND	0.50		µg/L	1	7/15/2004 10:43:00 PM
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: **BAT**
1,1,1-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
1,1,2,2-Tetrachloroethane	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
1,1,2-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
1,1-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
1,1-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
1,2-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
1,2-Dichloropropane	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
2-Butanone	ND	5.0		µg/L	1	7/13/2004 4:50:00 AM

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-1 (11-16')
Work Order:	0407134	**Collection Date:**	7/8/2004 4:10:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-01	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
2-Hexanone	ND	5.0		µg/L	1	7/13/2004 4:50:00 AM
4-Methyl-2-pentanone	ND	5.0		µg/L	1	7/13/2004 4:50:00 AM
Acetone	ND	20		µg/L	1	7/13/2004 4:50:00 AM
Benzene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Bromodichloromethane	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Bromoform	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Bromomethane	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Carbon disulfide	ND	2.5		µg/L	1	7/13/2004 4:50:00 AM
Carbon tetrachloride	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Chlorobenzene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Chloroethane	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Chloroform	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Chloromethane	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
cis-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
cis-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Dibromochloromethane	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Ethylbenzene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
m,p-Xylene	ND	2.0		µg/L	1	7/13/2004 4:50:00 AM
Methylene chloride	ND	5.0		µg/L	1	7/13/2004 4:50:00 AM
o-Xylene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Styrene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Tetrachloroethene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Toluene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
trans-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
trans-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Trichloroethene	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
Vinyl chloride	ND	1.0		µg/L	1	7/13/2004 4:50:00 AM
1,2-Dichloroethene, Total	ND	2.0		µg/L	1	7/13/2004 4:50:00 AM
1,3-Dichloropropene, Total	ND	2.0		µg/L	1	7/13/2004 4:50:00 AM
Xylenes, Total	ND	3.0		µg/L	1	7/13/2004 4:50:00 AM
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE
Cyanide, Total	0.013	0.0050		mg/L	2	7/16/2004

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-2 (15-16')
Work Order:	0407134	**Collection Date:**	7/7/2004 10:15:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-02	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
MERCURY BY CVAA		**EPA 7470**			Prep Date: **7/12/2004**	Analyst: **JDA**
Mercury	ND	0.00020		mg/L	1	7/12/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			Prep Date: **7/17/2004**	Analyst: **RM**
Aluminum	ND	0.050		mg/L	1	7/17/2004 9:24:00 PM
Arsenic	ND	0.0010		mg/L	1	7/17/2004 9:24:00 PM
Cadmium	ND	0.00020		mg/L	1	7/17/2004 9:24:00 PM
Chromium	0.0026	0.0020		mg/L	1	7/17/2004 9:24:00 PM
Copper	0.0052	0.0010		mg/L	1	7/17/2004 9:24:00 PM
Lead	ND	0.0010		mg/L	1	7/17/2004 9:24:00 PM
Magnesium	18	0.10		mg/L	1	7/17/2004 9:24:00 PM
Nickel	ND	0.025		mg/L	1	7/17/2004 9:24:00 PM
Silver	ND	0.00050		mg/L	1	7/17/2004 9:24:00 PM
Zinc	ND	0.010		mg/L	1	7/17/2004 9:24:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	ND	0.28		µg/L	1	7/15/2004
Acenaphthene	6.9	2.8		µg/L	10	7/16/2004 12:19:00 PM
Acenaphthylene	ND	5.6		µg/L	10	7/16/2004 12:19:00 PM
Anthracene	ND	2.8		µg/L	10	7/16/2004 12:19:00 PM
Benzo(a)anthracene	ND	2.8		µg/L	10	7/16/2004 12:19:00 PM
Benzo(a)pyrene	ND	2.8		µg/L	10	7/16/2004 12:19:00 PM
Benzo(b-k)fluoranthene	ND	2.8		µg/L	10	7/16/2004 12:19:00 PM
Benzo(g,h,i)perylene	ND	2.8		µg/L	10	7/16/2004 12:19:00 PM
Chrysene	ND	5.6		µg/L	10	7/16/2004 12:19:00 PM
Dibenzo(a,h)anthracene	ND	2.8		µg/L	10	7/16/2004 12:19:00 PM
Fluoranthene	6.7	5.6		µg/L	10	7/16/2004 12:19:00 PM
Fluorene	ND	5.6		µg/L	10	7/16/2004 12:19:00 PM
Indeno(1,2,3-cd)pyrene	ND	2.8		µg/L	10	7/16/2004 12:19:00 PM
Naphthalene	ND	0.56		µg/L	1	7/15/2004
Phenanthrene	ND	11		µg/L	10	7/16/2004 12:19:00 PM
Pyrene	ND	5.6		µg/L	10	7/16/2004 12:19:00 PM
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: **BAT**
1,1,1-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
1,1,2,2-Tetrachloroethane	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
1,1,2-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
1,1-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
1,1-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
1,2-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
1,2-Dichloropropane	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
2-Butanone	ND	5.0		µg/L	1	7/13/2004 5:24:00 AM

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-2 (15-16')
Work Order:	0407134	**Collection Date:**	7/7/2004 10:15:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-02	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
2-Hexanone	ND	5.0		µg/L	1	7/13/2004 5:24:00 AM
4-Methyl-2-pentanone	ND	5.0		µg/L	1	7/13/2004 5:24:00 AM
Acetone	ND	20		µg/L	1	7/13/2004 5:24:00 AM
Benzene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Bromodichloromethane	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Bromoform	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Bromomethane	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Carbon disulfide	ND	2.5		µg/L	1	7/13/2004 5:24:00 AM
Carbon tetrachloride	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Chlorobenzene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Chloroethane	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Chloroform	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Chloromethane	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
cis-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
cis-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Dibromochloromethane	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Ethylbenzene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
m,p-Xylene	ND	2.0		µg/L	1	7/13/2004 5:24:00 AM
Methylene chloride	ND	5.0		µg/L	1	7/13/2004 5:24:00 AM
o-Xylene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Styrene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Tetrachloroethene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Toluene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
trans-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
trans-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Trichloroethene	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
Vinyl chloride	ND	1.0		µg/L	1	7/13/2004 5:24:00 AM
1,2-Dichloroethene, Total	ND	2.0		µg/L	1	7/13/2004 5:24:00 AM
1,3-Dichloropropene, Total	ND	2.0		µg/L	1	7/13/2004 5:24:00 AM
Xylenes, Total	ND	3.0		µg/L	1	7/13/2004 5:24:00 AM
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE
Cyanide, Total	0.0078	0.0050		mg/L	2	7/16/2004

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-3 (14.5-18')
Work Order:	0407134	**Collection Date:**	7/7/2004 12:15:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-03	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
MERCURY BY CVAA		**EPA 7470**			Prep Date: **7/12/2004**	Analyst: **JDA**
Mercury	ND	0.00020		mg/L	1	7/12/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			Prep Date: **7/17/2004**	Analyst: **RM**
Aluminum	ND	0.050		mg/L	1	7/17/2004 9:29:00 PM
Arsenic	ND	0.0010		mg/L	1	7/17/2004 9:29:00 PM
Cadmium	ND	0.00020		mg/L	1	7/17/2004 9:29:00 PM
Chromium	ND	0.0020		mg/L	1	7/17/2004 9:29:00 PM
Copper	0.0013	0.0010		mg/L	1	7/17/2004 9:29:00 PM
Lead	ND	0.0010		mg/L	1	7/17/2004 9:29:00 PM
Magnesium	19	0.10		mg/L	1	7/17/2004 9:29:00 PM
Nickel	ND	0.025		mg/L	1	7/17/2004 9:29:00 PM
Silver	ND	0.00050		mg/L	1	7/17/2004 9:29:00 PM
Zinc	ND	0.010		mg/L	1	7/17/2004 9:29:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	ND	0.25		µg/L	1	7/16/2004 12:55:00 PM
Acenaphthene	ND	0.25		µg/L	1	7/16/2004 12:55:00 PM
Acenaphthylene	ND	0.50		µg/L	1	7/16/2004 12:55:00 PM
Anthracene	ND	0.25		µg/L	1	7/16/2004 12:55:00 PM
Benzo(a)anthracene	ND	0.25		µg/L	1	7/16/2004 12:55:00 PM
Benzo(a)pyrene	ND	0.25		µg/L	1	7/16/2004 12:55:00 PM
Benzo(b-k)fluoranthene	ND	0.25		µg/L	1	7/16/2004 12:55:00 PM
Benzo(g,h,i)perylene	ND	0.25		µg/L	1	7/16/2004 12:55:00 PM
Chrysene	ND	0.50		µg/L	1	7/16/2004 12:55:00 PM
Dibenzo(a,h)anthracene	ND	0.25		µg/L	1	7/16/2004 12:55:00 PM
Fluoranthene	ND	0.50		µg/L	1	7/16/2004 12:55:00 PM
Fluorene	ND	0.50		µg/L	1	7/16/2004 12:55:00 PM
Indeno(1,2,3-cd)pyrene	ND	0.25		µg/L	1	7/16/2004 12:55:00 PM
Naphthalene	ND	0.50		µg/L	1	7/16/2004 12:55:00 PM
Phenanthrene	ND	1.0		µg/L	1	7/16/2004 12:55:00 PM
Pyrene	ND	0.50		µg/L	1	7/16/2004 12:55:00 PM
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: **BAT**
1,1,1-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
1,1,2,2-Tetrachloroethane	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
1,1,2-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
1,1-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
1,1-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
1,2-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
1,2-Dichloropropane	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
2-Butanone	ND	5.0		µg/L	1	7/13/2004 5:57:00 AM

Qualifiers:

- ND - Not Detected at the Reporting Limit
- J - Analyte detected below quantitation limits
- B - Analyte detected in the associated Method Blank
- * - Value exceeds Maximum Contaminant Level
- S - Spike Recovery outside accepted recovery limits
- P - Dual Column results percent difference > 40%
- E - Value above quantitation range
- H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-3 (14.5-18')
Work Order:	0407134	**Collection Date:**	7/7/2004 12:15:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-03	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
2-Hexanone	ND	5.0		µg/L	1	7/13/2004 5:57:00 AM
4-Methyl-2-pentanone	ND	5.0		µg/L	1	7/13/2004 5:57:00 AM
Acetone	ND	20		µg/L	1	7/13/2004 5:57:00 AM
Benzene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Bromodichloromethane	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Bromoform	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Bromomethane	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Carbon disulfide	ND	2.5		µg/L	1	7/13/2004 5:57:00 AM
Carbon tetrachloride	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Chlorobenzene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Chloroethane	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Chloroform	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Chloromethane	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
cis-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
cis-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Dibromochloromethane	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Ethylbenzene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
m,p-Xylene	ND	2.0		µg/L	1	7/13/2004 5:57:00 AM
Methylene chloride	ND	5.0		µg/L	1	7/13/2004 5:57:00 AM
o-Xylene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Styrene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Tetrachloroethene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Toluene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
trans-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
trans-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Trichloroethene	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
Vinyl chloride	ND	1.0		µg/L	1	7/13/2004 5:57:00 AM
1,2-Dichloroethene, Total	ND	2.0		µg/L	1	7/13/2004 5:57:00 AM
1,3-Dichloropropene, Total	ND	2.0		µg/L	1	7/13/2004 5:57:00 AM
Xylenes, Total	ND	3.0		µg/L	1	7/13/2004 5:57:00 AM
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE
Cyanide, Total	ND	0.0050		mg/L	2	7/16/2004

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-4 (15-18')
Work Order:	0407134	**Collection Date:**	7/7/2004 4:30:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-04	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
MERCURY BY CVAA		**EPA 7470**			**Prep Date: 7/12/2004**	**Analyst: JDA**
Mercury	ND	0.00020		mg/L	1	7/12/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			**Prep Date: 7/17/2004**	**Analyst: RM**
Aluminum	ND	0.050		mg/L	1	7/17/2004 9:33:00 PM
Arsenic	ND	0.0010		mg/L	1	7/17/2004 9:33:00 PM
Cadmium	ND	0.00020		mg/L	1	7/17/2004 9:33:00 PM
Chromium	ND	0.0020		mg/L	1	7/17/2004 9:33:00 PM
Copper	0.0014	0.0010		mg/L	1	7/17/2004 9:33:00 PM
Lead	ND	0.0010		mg/L	1	7/17/2004 9:33:00 PM
Magnesium	17	0.10		mg/L	1	7/17/2004 9:33:00 PM
Nickel	ND	0.025		mg/L	1	7/17/2004 9:33:00 PM
Silver	ND	0.00050		mg/L	1	7/17/2004 9:33:00 PM
Zinc	ND	0.010		mg/L	1	7/17/2004 9:33:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			**Prep Date: 7/14/2004**	**Analyst: DAH**
2-Methylnaphthalene	ND	0.25		µg/L	1	7/16/2004 1:28:00 AM
Acenaphthene	ND	0.25		µg/L	1	7/16/2004 1:28:00 AM
Acenaphthylene	ND	0.50		µg/L	1	7/16/2004 1:28:00 AM
Anthracene	ND	0.25		µg/L	1	7/16/2004 1:28:00 AM
Benzo(a)anthracene	ND	0.25		µg/L	1	7/16/2004 1:28:00 AM
Benzo(a)pyrene	ND	0.25		µg/L	1	7/16/2004 1:28:00 AM
Benzo(b-k)fluoranthene	ND	0.25		µg/L	1	7/16/2004 1:28:00 AM
Benzo(g,h,i)perylene	ND	0.25		µg/L	1	7/16/2004 1:28:00 AM
Chrysene	ND	0.50		µg/L	1	7/16/2004 1:28:00 AM
Dibenzo(a,h)anthracene	ND	0.25		µg/L	1	7/16/2004 1:28:00 AM
Fluoranthene	ND	0.50		µg/L	1	7/16/2004 1:28:00 AM
Fluorene	ND	0.50		µg/L	1	7/16/2004 1:28:00 AM
Indeno(1,2,3-cd)pyrene	ND	0.25		µg/L	1	7/16/2004 1:28:00 AM
Naphthalene	ND	0.50		µg/L	1	7/16/2004 1:28:00 AM
Phenanthrene	ND	1.0		µg/L	1	7/16/2004 1:28:00 AM
Pyrene	ND	0.50		µg/L	1	7/16/2004 1:28:00 AM
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				**Analyst: BAT**
1,1,1-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
1,1,2,2-Tetrachloroethane	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
1,1,2-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
1,1-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
1,1-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
1,2-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
1,2-Dichloropropane	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
2-Butanone	ND	5.0		µg/L	1	7/13/2004 6:30:00 AM

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-4 (15-18')
Work Order:	0407134	**Collection Date:**	7/7/2004 4:30:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-04	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
2-Hexanone	ND	5.0		µg/L	1	7/13/2004 6:30:00 AM
4-Methyl-2-pentanone	ND	5.0		µg/L	1	7/13/2004 6:30:00 AM
Acetone	ND	20		µg/L	1	7/13/2004 6:30:00 AM
Benzene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Bromodichloromethane	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Bromoform	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Bromomethane	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Carbon disulfide	ND	2.5		µg/L	1	7/13/2004 6:30:00 AM
Carbon tetrachloride	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Chlorobenzene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Chloroethane	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Chloroform	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Chloromethane	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
cis-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
cis-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Dibromochloromethane	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Ethylbenzene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
m,p-Xylene	ND	2.0		µg/L	1	7/13/2004 6:30:00 AM
Methylene chloride	ND	5.0		µg/L	1	7/13/2004 6:30:00 AM
o-Xylene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Styrene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Tetrachloroethene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Toluene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
trans-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
trans-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
Trichloroethene	22	1.0		µg/L	1	7/13/2004 6:30:00 AM
Vinyl chloride	ND	1.0		µg/L	1	7/13/2004 6:30:00 AM
1,2-Dichloroethene, Total	ND	2.0		µg/L	1	7/13/2004 6:30:00 AM
1,3-Dichloropropene, Total	ND	2.0		µg/L	1	7/13/2004 6:30:00 AM
Xylenes, Total	ND	3.0		µg/L	1	7/13/2004 6:30:00 AM
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE
Cyanide, Total	0.025	0.0050		mg/L	2	7/16/2004

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-5 (9.5-12')
Work Order:	0407134	**Collection Date:**	7/8/2004 10:00:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-05	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
MERCURY BY CVAA		**EPA 7470**			Prep Date: **7/12/2004**	Analyst: **JDA**
Mercury	ND	0.00020		mg/L	1	7/12/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			Prep Date: **7/17/2004**	Analyst: **RM**
Aluminum	ND	0.050		mg/L	1	7/18/2004 10:11:00 PM
Arsenic	ND	0.0010		mg/L	1	7/17/2004 11:08:00 PM
Cadmium	ND	0.00020		mg/L	1	7/17/2004 11:08:00 PM
Chromium	ND	0.0020		mg/L	1	7/17/2004 11:08:00 PM
Copper	0.0030	0.0010		mg/L	1	7/17/2004 11:08:00 PM
Lead	ND	0.0010		mg/L	1	7/17/2004 11:08:00 PM
Magnesium	8.8	0.10		mg/L	1	7/18/2004 10:11:00 PM
Nickel	ND	0.025		mg/L	1	7/17/2004 11:08:00 PM
Silver	ND	0.00050		mg/L	1	7/17/2004 11:08:00 PM
Zinc	ND	0.010		mg/L	1	7/17/2004 11:08:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	ND	0.25		µg/L	1	7/16/2004 2:00:00 AM
Acenaphthene	ND	0.25		µg/L	1	7/16/2004 2:00:00 AM
Acenaphthylene	ND	0.50		µg/L	1	7/16/2004 2:00:00 AM
Anthracene	ND	0.25		µg/L	1	7/16/2004 2:00:00 AM
Benzo(a)anthracene	ND	0.25		µg/L	1	7/16/2004 2:00:00 AM
Benzo(a)pyrene	ND	0.25		µg/L	1	7/16/2004 2:00:00 AM
Benzo(b-k)fluoranthene	ND	0.25		µg/L	1	7/16/2004 2:00:00 AM
Benzo(g,h,i)perylene	ND	0.25		µg/L	1	7/16/2004 2:00:00 AM
Chrysene	ND	0.50		µg/L	1	7/16/2004 2:00:00 AM
Dibenzo(a,h)anthracene	ND	0.25		µg/L	1	7/16/2004 2:00:00 AM
Fluoranthene	ND	0.50		µg/L	1	7/16/2004 2:00:00 AM
Fluorene	ND	0.50		µg/L	1	7/16/2004 2:00:00 AM
Indeno(1,2,3-cd)pyrene	ND	0.25		µg/L	1	7/16/2004 2:00:00 AM
Naphthalene	ND	0.50		µg/L	1	7/16/2004 2:00:00 AM
Phenanthrene	ND	1.0		µg/L	1	7/16/2004 2:00:00 AM
Pyrene	ND	0.50		µg/L	1	7/16/2004 2:00:00 AM
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: **BAT**
1,1,1-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
1,1,2,2-Tetrachloroethane	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
1,1,2-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
1,1-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
1,1-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
1,2-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
1,2-Dichloropropane	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
2-Butanone	ND	5.0		µg/L	1	7/13/2004 7:03:00 AM

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-5 (9.5-12')
Work Order:	0407134	**Collection Date:**	7/8/2004 10:00:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-05	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
2-Hexanone	ND	5.0		µg/L	1	7/13/2004 7:03:00 AM
4-Methyl-2-pentanone	ND	5.0		µg/L	1	7/13/2004 7:03:00 AM
Acetone	ND	20		µg/L	1	7/13/2004 7:03:00 AM
Benzene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Bromodichloromethane	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Bromoform	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Bromomethane	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Carbon disulfide	ND	2.5		µg/L	1	7/13/2004 7:03:00 AM
Carbon tetrachloride	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Chlorobenzene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Chloroethane	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Chloroform	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Chloromethane	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
cis-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
cis-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Dibromochloromethane	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Ethylbenzene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
m,p-Xylene	ND	2.0		µg/L	1	7/13/2004 7:03:00 AM
Methylene chloride	ND	5.0		µg/L	1	7/13/2004 7:03:00 AM
o-Xylene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Styrene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Tetrachloroethene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Toluene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
trans-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
trans-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Trichloroethene	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
Vinyl chloride	ND	1.0		µg/L	1	7/13/2004 7:03:00 AM
1,2-Dichloroethene, Total	ND	2.0		µg/L	1	7/13/2004 7:03:00 AM
1,3-Dichloropropene, Total	ND	2.0		µg/L	1	7/13/2004 7:03:00 AM
Xylenes, Total	ND	3.0		µg/L	1	7/13/2004 7:03:00 AM
CYANIDE, TOTAL		**EPA 9014**				Analyst: **KAE**
Cyanide, Total	ND	0.0050		mg/L	2	7/16/2004

Qualifiers:	ND - Not Detected at the Reporting Limit	S - Spike Recovery outside accepted recovery limits
	J - Analyte detected below quantitation limits	P - Dual Column results percent difference > 40%
	B - Analyte detected in the associated Method Blank	E - Value above quantitation range
	* - Value exceeds Maximum Contaminant Level	H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-6 (15-18')
Work Order:	0407134	**Collection Date:**	7/8/2004 10:45:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-06	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
MERCURY BY CVAA		**EPA 7470**			Prep Date: **7/12/2004**	Analyst: **JDA**
Mercury	ND	0.00020		mg/L	1	7/12/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			Prep Date: **7/17/2004**	Analyst: **RM**
Aluminum	ND	0.050		mg/L	1	7/18/2004 10:16:00 PM
Arsenic	ND	0.0010		mg/L	1	7/17/2004 11:12:00 PM
Cadmium	ND	0.00020		mg/L	1	7/17/2004 11:12:00 PM
Chromium	ND	0.0020		mg/L	1	7/17/2004 11:12:00 PM
Copper	0.0020	0.0010		mg/L	1	7/17/2004 11:12:00 PM
Lead	ND	0.0010		mg/L	1	7/17/2004 11:12:00 PM
Magnesium	23	0.10		mg/L	1	7/18/2004 10:16:00 PM
Nickel	ND	0.025		mg/L	1	7/17/2004 11:12:00 PM
Silver	ND	0.00050		mg/L	1	7/17/2004 11:12:00 PM
Zinc	ND	0.010		mg/L	1	7/17/2004 11:12:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	ND	0.26		µg/L	1	7/16/2004 2:33:00 AM
Acenaphthene	ND	0.26		µg/L	1	7/16/2004 2:33:00 AM
Acenaphthylene	ND	0.51		µg/L	1	7/16/2004 2:33:00 AM
Anthracene	ND	0.26		µg/L	1	7/16/2004 2:33:00 AM
Benzo(a)anthracene	ND	0.26		µg/L	1	7/16/2004 2:33:00 AM
Benzo(a)pyrene	ND	0.26		µg/L	1	7/16/2004 2:33:00 AM
Benzo(b-k)fluoranthene	ND	0.26		µg/L	1	7/16/2004 2:33:00 AM
Benzo(g,h,i)perylene	ND	0.26		µg/L	1	7/16/2004 2:33:00 AM
Chrysene	ND	0.51		µg/L	1	7/16/2004 2:33:00 AM
Dibenzo(a,h)anthracene	ND	0.26		µg/L	1	7/16/2004 2:33:00 AM
Fluoranthene	ND	0.51		µg/L	1	7/16/2004 2:33:00 AM
Fluorene	ND	0.51		µg/L	1	7/16/2004 2:33:00 AM
Indeno(1,2,3-cd)pyrene	ND	0.26		µg/L	1	7/16/2004 2:33:00 AM
Naphthalene	ND	0.51		µg/L	1	7/16/2004 2:33:00 AM
Phenanthrene	ND	1.0		µg/L	1	7/16/2004 2:33:00 AM
Pyrene	ND	0.51		µg/L	1	7/16/2004 2:33:00 AM
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: **BAT**
1,1,1-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
1,1,2,2-Tetrachloroethane	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
1,1,2-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
1,1-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
1,1-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
1,2-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
1,2-Dichloropropane	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
2-Butanone	ND	5.0		µg/L	1	7/13/2004 7:37:00 AM

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	TW-6 (15-18')
Work Order:	0407134	**Collection Date:**	7/8/2004 10:45:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-06	**Matrix:**	GROUNDWATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
2-Hexanone	ND	5.0		µg/L	1	7/13/2004 7:37:00 AM
4-Methyl-2-pentanone	ND	5.0		µg/L	1	7/13/2004 7:37:00 AM
Acetone	ND	20		µg/L	1	7/13/2004 7:37:00 AM
Benzene	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Bromodichloromethane	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Bromoform	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Bromomethane	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Carbon disulfide	ND	2.5		µg/L	1	7/13/2004 7:37:00 AM
Carbon tetrachloride	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Chlorobenzene	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Chloroethane	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Chloroform	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Chloromethane	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
cis-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
cis-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Dibromochloromethane	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Ethylbenzene	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
m,p-Xylene	ND	2.0		µg/L	1	7/13/2004 7:37:00 AM
Methylene chloride	ND	5.0		µg/L	1	7/13/2004 7:37:00 AM
o-Xylene	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Styrene	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Tetrachloroethene	7.4	1.0		µg/L	1	7/13/2004 7:37:00 AM
Toluene	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
trans-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
trans-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
Trichloroethene	.27	1.0		µg/L	1	7/13/2004 7:37:00 AM
Vinyl chloride	ND	1.0		µg/L	1	7/13/2004 7:37:00 AM
1,2-Dichloroethene, Total	ND	2.0		µg/L	1	7/13/2004 7:37:00 AM
1,3-Dichloropropene, Total	ND	2.0		µg/L	1	7/13/2004 7:37:00 AM
Xylenes, Total	ND	3.0		µg/L	1	7/13/2004 7:37:00 AM
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE
Cyanide, Total	ND	0.0050		mg/L	2	7/16/2004

Qualifiers:

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* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-1 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 11:05:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-07	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS		**EPA 8082**			Prep Date: **7/15/2004**	Analyst: **RM**
Aroclor 1016	ND	67		µg/Kg-dry	1	7/17/2004 2:53:08 PM
Aroclor 1221	ND	67		µg/Kg-dry	1	7/17/2004 2:53:08 PM
Aroclor 1232	ND	67		µg/Kg-dry	1	7/17/2004 2:53:08 PM
Aroclor 1242	ND	67		µg/Kg-dry	1	7/17/2004 2:53:08 PM
Aroclor 1248	ND	67		µg/Kg-dry	1	7/17/2004 2:53:08 PM
Aroclor 1254	ND	67		µg/Kg-dry	1	7/17/2004 2:53:08 PM
Aroclor 1260	ND	67		µg/Kg-dry	1	7/17/2004 2:53:08 PM
MERCURY BY CVAA		**EPA 7471**			Prep Date: **7/16/2004**	Analyst: **JDA**
Mercury	0.082	0.0089		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			Prep Date: **7/16/2004**	Analyst: **RM**
Aluminum	8,900	540		mg/Kg-dry	1000	7/18/2004 8:31:00 PM
Arsenic	88	0.54		mg/Kg-dry	10	7/18/2004 8:40:00 PM
Cadmium	8.4	0.027		mg/Kg-dry	1	7/18/2004 1:20:00 AM
Chromium	56	0.27		mg/Kg-dry	1	7/18/2004 1:20:00 AM
Copper	24	0.54		mg/Kg-dry	1	7/18/2004 1:20:00 AM
Lead	700	54		mg/Kg-dry	100	7/18/2004 8:35:00 PM
Magnesium	4,600	16		mg/Kg-dry	10	7/18/2004 8:40:00 PM
Nickel	32	0.54		mg/Kg-dry	1	7/18/2004 1:20:00 AM
Silver	ND	0.27		mg/Kg-dry	1	7/18/2004 1:20:00 AM
Zinc	14,000	540		mg/Kg-dry	1000	7/18/2004 8:31:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	200	23		µg/Kg-dry	1	7/16/2004 3:06:00 PM
Acenaphthene	17	12		µg/Kg-dry	1	7/16/2004 3:06:00 PM
Acenaphthylene	ND	35		µg/Kg-dry	1	7/16/2004 3:06:00 PM
Anthracene	130	23		µg/Kg-dry	1	7/16/2004 3:06:00 PM
Benzo(a)anthracene	750	120		µg/Kg-dry	5	7/21/2004 3:39:00 AM
Benzo(a)pyrene	400	120		µg/Kg-dry	5	7/21/2004 3:39:00 AM
Benzo(b-k)fluoranthene	430	230		µg/Kg-dry	5	7/21/2004 3:39:00 AM
Benzo(g,h,i)perylene	140	120		µg/Kg-dry	5	7/21/2004 3:39:00 AM
Chrysene	360	58		µg/Kg-dry	5	7/21/2004 3:39:00 AM
Dibenzo(a,h)anthracene	ND	120		µg/Kg-dry	5	7/21/2004 3:39:00 AM
Fluoranthene	240	35		µg/Kg-dry	1	7/16/2004 3:06:00 PM
Fluorene	35	23		µg/Kg-dry	1	7/16/2004 3:06:00 PM
Indeno(1,2,3-cd)pyrene	130	120		µg/Kg-dry	5	7/21/2004 3:39:00 AM
Naphthalene	110	35		µg/Kg-dry	1	7/16/2004 3:06:00 PM
Phenanthrene	450	58		µg/Kg-dry	1	7/16/2004 3:06:00 PM
Pyrene	1,100	170		µg/Kg-dry	5	7/21/2004 3:39:00 AM

Qualifiers:

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B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-1 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 11:05:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-07	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				**Analyst: DAH**
1,1,1-Trichloroethane	ND	54		µg/Kg-dry	114	7/12/2004
1,1,2,2-Tetrachloroethane	ND	80		µg/Kg-dry	114	7/12/2004
1,1,2-Trichloroethane	ND	54		µg/Kg-dry	114	7/12/2004
1,1-Dichloroethane	ND	54		µg/Kg-dry	114	7/12/2004
1,1-Dichloroethene	ND	54		µg/Kg-dry	114	7/12/2004
1,2-Dichloroethane	ND	54		µg/Kg-dry	114	7/12/2004
1,2-Dichloropropane	ND	54		µg/Kg-dry	114	7/12/2004
2-Butanone	ND	200		µg/Kg-dry	114	7/12/2004
2-Hexanone	ND	200		µg/Kg-dry	114	7/12/2004
4-Methyl-2-pentanone	ND	200		µg/Kg-dry	114	7/12/2004
Acetone	ND	600		µg/Kg-dry	114	7/12/2004
Benzene	ND	54		µg/Kg-dry	114	7/12/2004
Bromodichloromethane	ND	80		µg/Kg-dry	114	7/12/2004
Bromoform	ND	80		µg/Kg-dry	114	7/12/2004
Bromomethane	ND	200		µg/Kg-dry	114	7/12/2004
Carbon disulfide	ND	200		µg/Kg-dry	114	7/12/2004
Carbon tetrachloride	ND	54		µg/Kg-dry	114	7/12/2004
Chlorobenzene	ND	54		µg/Kg-dry	114	7/12/2004
Chloroethane	ND	200		µg/Kg-dry	114	7/12/2004
Chloroform	ND	54		µg/Kg-dry	114	7/12/2004
Chloromethane	ND	200		µg/Kg-dry	114	7/12/2004
cis-1,2-Dichloroethene	ND	54		µg/Kg-dry	114	7/12/2004
cis-1,3-Dichloropropene	ND	54		µg/Kg-dry	114	7/12/2004
Dibromochloromethane	ND	80		µg/Kg-dry	114	7/12/2004
Ethylbenzene	ND	54		µg/Kg-dry	114	7/12/2004
m,p-Xylene	ND	80		µg/Kg-dry	114	7/12/2004
Methylene chloride	ND	270		µg/Kg-dry	114	7/12/2004
o-Xylene	ND	54		µg/Kg-dry	114	7/12/2004
Styrene	ND	54		µg/Kg-dry	114	7/12/2004
Tetrachloroethene	ND	54		µg/Kg-dry	114	7/12/2004
Toluene	ND	54		µg/Kg-dry	114	7/12/2004
trans-1,2-Dichloroethene	ND	54		µg/Kg-dry	114	7/12/2004
trans-1,3-Dichloropropene	ND	54		µg/Kg-dry	114	7/12/2004
Trichloroethene	ND	54		µg/Kg-dry	114	7/12/2004
Vinyl chloride	ND	80		µg/Kg-dry	114	7/12/2004
1,2-Dichloroethene, Total	ND	80		µg/Kg-dry	114	7/12/2004
1,3-Dichloropropene, Total	ND	80		µg/Kg-dry	114	7/12/2004
Xylenes, Total	ND	120		µg/Kg-dry	114	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				**Analyst: KAE**

Qualifiers:

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E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-1 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 11:05:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-07	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.59		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: **JJG**
Chromium, Trivalent	ND	0.59		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: **7/14/2004**	Analyst: **JJG**
Chromium, Hexavalent	56	5.6		mg/Kg-dry	10	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: **KAE**
Percent Moisture	15	0.010		% of sample.	1	7/12/2004

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* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-2 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 11:35:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-08	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS			**EPA 8082**		Prep Date: **7/15/2004**	Analyst: **RM**
Aroclor 1016	ND	61		µg/Kg-dry	1	7/17/2004 3:30:30 PM
Aroclor 1221	ND	61		µg/Kg-dry	1	7/17/2004 3:30:30 PM
Aroclor 1232	ND	61		µg/Kg-dry	1	7/17/2004 3:30:30 PM
Aroclor 1242	ND	61		µg/Kg-dry	1	7/17/2004 3:30:30 PM
Aroclor 1248	ND	61		µg/Kg-dry	1	7/17/2004 3:30:30 PM
Aroclor 1254	ND	61		µg/Kg-dry	1	7/17/2004 3:30:30 PM
Aroclor 1260	ND	61		µg/Kg-dry	1	7/17/2004 3:30:30 PM
MERCURY BY CVAA			**EPA 7471**		Prep Date: **7/16/2004**	Analyst: **JDA**
Mercury	0.015	0.013		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS			**EPA 6020A**		Prep Date: **7/16/2004**	Analyst: **RM**
Aluminum	3,900	51		mg/Kg-dry	100	7/18/2004 10:21:00 PM
Arsenic	2.5	0.051		mg/Kg-dry	1	7/17/2004 4:37:00 PM
Cadmium	0.16	0.025		mg/Kg-dry	1	7/17/2004 4:37:00 PM
Chromium	9.9	0.25		mg/Kg-dry	1	7/17/2004 4:37:00 PM
Copper	9.6	0.51		mg/Kg-dry	1	7/17/2004 4:37:00 PM
Lead	17	0.51		mg/Kg-dry	1	7/17/2004 4:37:00 PM
Magnesium	3,600	1.5		mg/Kg-dry	1	7/17/2004 4:37:00 PM
Nickel	7.5	0.51		mg/Kg-dry	1	7/17/2004 4:37:00 PM
Silver	ND	0.25		mg/Kg-dry	1	7/17/2004 4:37:00 PM
Zinc	ND	0.51		mg/Kg-dry	1	7/17/2004 4:37:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM			**EPA 8270M**		Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	39	10		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Acenaphthene	ND	5.0		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Acenaphthylene	ND	15		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Anthracene	ND	10		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Benzo(a)anthracene	29	10		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Benzo(a)pyrene	31	10		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Benzo(b-k)fluoranthene	65	20		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Benzo(g,h,i)perylene	21	10		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Chrysene	22	5.0		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Dibenzo(a,h)anthracene	ND	10		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Fluoranthene	32	15		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Fluorene	ND	10		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Indeno(1,2,3-cd)pyrene	18	10		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Naphthalene	90	15		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Phenanthrene	47	25		µg/Kg-dry	1	7/16/2004 10:07:00 AM
Pyrene	50	15		µg/Kg-dry	1	7/16/2004 10:07:00 AM

Qualifiers:

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* - Value exceeds Maximum Contaminant Level
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P - Dual Column results percent difference > 40%
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H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-2 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 11:35:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-08	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: **DAH**
1,1,1-Trichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,1,2,2-Tetrachloroethane	ND	64		µg/Kg-dry	100	7/12/2004
1,1,2-Trichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,1-Dichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,1-Dichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
1,2-Dichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,2-Dichloropropane	ND	43		µg/Kg-dry	100	7/12/2004
2-Butanone	ND	160		µg/Kg-dry	100	7/12/2004
2-Hexanone	ND	160		µg/Kg-dry	100	7/12/2004
4-Methyl-2-pentanone	ND	160		µg/Kg-dry	100	7/12/2004
Acetone	ND	480		µg/Kg-dry	100	7/12/2004
Benzene	ND	43		µg/Kg-dry	100	7/12/2004
Bromodichloromethane	ND	64		µg/Kg-dry	100	7/12/2004
Bromoform	ND	64		µg/Kg-dry	100	7/12/2004
Bromomethane	ND	160		µg/Kg-dry	100	7/12/2004
Carbon disulfide	ND	160		µg/Kg-dry	100	7/12/2004
Carbon tetrachloride	ND	43		µg/Kg-dry	100	7/12/2004
Chlorobenzene	ND	43		µg/Kg-dry	100	7/12/2004
Chloroethane	ND	160		µg/Kg-dry	100	7/12/2004
Chloroform	ND	43		µg/Kg-dry	100	7/12/2004
Chloromethane	ND	160		µg/Kg-dry	100	7/12/2004
cis-1,2-Dichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
cis-1,3-Dichloropropene	ND	43		µg/Kg-dry	100	7/12/2004
Dibromochloromethane	ND	64		µg/Kg-dry	100	7/12/2004
Ethylbenzene	ND	43		µg/Kg-dry	100	7/12/2004
m,p-Xylene	ND	64		µg/Kg-dry	100	7/12/2004
Methylene chloride	ND	210		µg/Kg-dry	100	7/12/2004
o-Xylene	ND	43		µg/Kg-dry	100	7/12/2004
Styrene	ND	43		µg/Kg-dry	100	7/12/2004
Tetrachloroethene	ND	43		µg/Kg-dry	100	7/12/2004
Toluene	ND	43		µg/Kg-dry	100	7/12/2004
trans-1,2-Dichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
trans-1,3-Dichloropropene	ND	43		µg/Kg-dry	100	7/12/2004
Trichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
Vinyl chloride	ND	64		µg/Kg-dry	100	7/12/2004
1,2-Dichloroethene, Total	ND	64		µg/Kg-dry	100	7/12/2004
1,3-Dichloropropene, Total	ND	64		µg/Kg-dry	100	7/12/2004
Xylenes, Total	ND	96		µg/Kg-dry	100	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: **KAE**

Qualifiers:

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P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-2 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 11:35:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-08	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.53		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: **JJG**
Chromium, Trivalent	9.3	0.53		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: **7/14/2004**	Analyst: **JJG**
Chromium, Hexavalent	0.61	0.52		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: **KAE**
Percent Moisture	5.9	0.010		% of sample	1	7/12/2004

Qualifiers:

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J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-3 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 12:05:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-09	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS		**EPA 8082**			Prep Date: **7/15/2004**	Analyst: **RM**
Aroclor 1016	ND	68		µg/Kg-dry	1	7/17/2004 4:07:44 PM
Aroclor 1221	ND	68		µg/Kg-dry	1	7/17/2004 4:07:44 PM
Aroclor 1232	ND	68		µg/Kg-dry	1	7/17/2004 4:07:44 PM
Aroclor 1242	ND	68		µg/Kg-dry	1	7/17/2004 4:07:44 PM
Aroclor 1248	ND	68		µg/Kg-dry	1	7/17/2004 4:07:44 PM
Aroclor 1254	ND	68		µg/Kg-dry	1	7/17/2004 4:07:44 PM
Aroclor 1260	ND	68		µg/Kg-dry	1	7/17/2004 4:07:44 PM
MERCURY BY CVAA		**EPA 7471**			Prep Date: **7/16/2004**	Analyst: **JDA**
Mercury	0.10	0.015		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			Prep Date: **7/16/2004**	Analyst: **RM**
Aluminum	8,400	260		mg/Kg-dry	500	7/18/2004 10:25:00 PM
Arsenic	8.2	0.053		mg/Kg-dry	1	7/17/2004 4:41:00 PM
Cadmium	1.8	0.026		mg/Kg-dry	1	7/17/2004 4:41:00 PM
Chromium	16	0.26		mg/Kg-dry	1	7/17/2004 4:41:00 PM
Copper	42	0.53		mg/Kg-dry	1	7/17/2004 4:41:00 PM
Lead	100	5.3		mg/Kg-dry	10	7/18/2004 8:07:00 PM
Magnesium	710	1.6		mg/Kg-dry	1	7/17/2004 4:41:00 PM
Nickel	13	0.53		mg/Kg-dry	1	7/17/2004 4:41:00 PM
Silver	ND	0.26		mg/Kg-dry	1	7/17/2004 4:41:00 PM
Zinc	ND	0.53		mg/Kg-dry	1	7/17/2004 4:41:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	1,100	110		µg/Kg-dry	10	7/21/2004 12:20:00 PM
Acenaphthene	34	5.6		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Acenaphthylene	39	17		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Anthracene	130	11		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Benzo(a)anthracene	220	11		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Benzo(a)pyrene	190	11		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Benzo(b-k)fluoranthene	410	22		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Benzo(g,h,i)perylene	70	11		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Chrysene	45	5.6		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Dibenzo(a,h)anthracene	41	11		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Fluoranthene	640	17		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Fluorene	32	11		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Indeno(1,2,3-cd)pyrene	74	11		µg/Kg-dry	1	7/16/2004 10:40:00 AM
Naphthalene	1,200	170		µg/Kg-dry	10	7/21/2004 12:20:00 PM
Phenanthrene	540	280		µg/Kg-dry	10	7/21/2004 12:20:00 PM
Pyrene	270	17		µg/Kg-dry	1	7/16/2004 10:40:00 AM

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- * - Value exceeds Maximum Contaminant Level
- S - Spike Recovery outside accepted recovery limits
- P - Dual Column results percent difference > 40%
- E - Value above quantitation range
- H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-3 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 12:05:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-09	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: DAH
1,1,1-Trichloroethane	ND	57		µg/Kg-dry	126	7/12/2004
1,1,2,2-Tetrachloroethane	ND	86		µg/Kg-dry	126	7/12/2004
1,1,2-Trichloroethane	ND	57		µg/Kg-dry	126	7/12/2004
1,1-Dichloroethane	ND	57		µg/Kg-dry	126	7/12/2004
1,1-Dichloroethene	ND	57		µg/Kg-dry	126	7/12/2004
1,2-Dichloroethane	ND	57		µg/Kg-dry	126	7/12/2004
1,2-Dichloropropane	ND	57		µg/Kg-dry	126	7/12/2004
2-Butanone	ND	220		µg/Kg-dry	126	7/12/2004
2-Hexanone	ND	220		µg/Kg-dry	126	7/12/2004
4-Methyl-2-pentanone	ND	220		µg/Kg-dry	126	7/12/2004
Acetone	ND	650		µg/Kg-dry	126	7/12/2004
Benzene	ND	57		µg/Kg-dry	126	7/12/2004
Bromodichloromethane	ND	86		µg/Kg-dry	126	7/12/2004
Bromoform	ND	86		µg/Kg-dry	126	7/12/2004
Bromomethane	ND	220		µg/Kg-dry	126	7/12/2004
Carbon disulfide	ND	220		µg/Kg-dry	126	7/12/2004
Carbon tetrachloride	ND	57		µg/Kg-dry	126	7/12/2004
Chlorobenzene	ND	57		µg/Kg-dry	126	7/12/2004
Chloroethane	ND	220		µg/Kg-dry	126	7/12/2004
Chloroform	ND	57		µg/Kg-dry	126	7/12/2004
Chloromethane	ND	220		µg/Kg-dry	126	7/12/2004
cis-1,2-Dichloroethene	ND	57		µg/Kg-dry	126	7/12/2004
cis-1,3-Dichloropropene	ND	57		µg/Kg-dry	126	7/12/2004
Dibromochloromethane	ND	86		µg/Kg-dry	126	7/12/2004
Ethylbenzene	ND	57		µg/Kg-dry	126	7/12/2004
m,p-Xylene	ND	86		µg/Kg-dry	126	7/12/2004
Methylene chloride	ND	290		µg/Kg-dry	126	7/12/2004
o-Xylene	69	57		µg/Kg-dry	126	7/12/2004
Styrene	ND	57		µg/Kg-dry	126	7/12/2004
Tetrachloroethene	ND	57		µg/Kg-dry	126	7/12/2004
Toluene	ND	57		µg/Kg-dry	126	7/12/2004
trans-1,2-Dichloroethene	ND	57		µg/Kg-dry	126	7/12/2004
trans-1,3-Dichloropropene	ND	57		µg/Kg-dry	126	7/12/2004
Trichloroethene	ND	57		µg/Kg-dry	126	7/12/2004
Vinyl chloride	ND	86		µg/Kg-dry	126	7/12/2004
1,2-Dichloroethene, Total	ND	86		µg/Kg-dry	126	7/12/2004
1,3-Dichloropropene, Total	ND	86		µg/Kg-dry	126	7/12/2004
Xylenes, Total	ND	130		µg/Kg-dry	126	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE

Qualifiers:

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* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-3 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 12:05:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-09	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.57		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: JJG
Chromium, Trivalent	14	0.57		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: **7/14/2004**	Analyst: JJG
Chromium, Hexavalent	2.2	0.53		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: KAE
Percent Moisture	12	0.010		% of sample	1	7/12/2004

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* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-4 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 12:45:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-10	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS		EPA 8082			Prep Date: 7/15/2004	Analyst: RM
Aroclor 1016	ND	61		µg/Kg-dry	1	7/17/2004 4:44:57 PM
Aroclor 1221	ND	61		µg/Kg-dry	1	7/17/2004 4:44:57 PM
Aroclor 1232	ND	61		µg/Kg-dry	1	7/17/2004 4:44:57 PM
Aroclor 1242	ND	61		µg/Kg-dry	1	7/17/2004 4:44:57 PM
Aroclor 1248	ND	61		µg/Kg-dry	1	7/17/2004 4:44:57 PM
Aroclor 1254	ND	61		µg/Kg-dry	1	7/17/2004 4:44:57 PM
Aroclor 1260	ND	61		µg/Kg-dry	1	7/17/2004 4:44:57 PM
MERCURY BY CVAA		EPA 7471			Prep Date: 7/16/2004	Analyst: JDA
Mercury	ND	0.011		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS		EPA 6020A			Prep Date: 7/16/2004	Analyst: RM
Aluminum	7,800	230		mg/Kg-dry	500	7/18/2004 10:30:00 PM
Arsenic	5.1	0.045		mg/Kg-dry	1	7/17/2004 4:46:00 PM
Cadmium	0.077	0.023		mg/Kg-dry	1	7/17/2004 4:46:00 PM
Chromium	11	0.23		mg/Kg-dry	1	7/17/2004 4:46:00 PM
Copper	12	0.45		mg/Kg-dry	1	7/17/2004 4:46:00 PM
Lead	8.1	0.45		mg/Kg-dry	1	7/17/2004 4:46:00 PM
Magnesium	1,300	1.4		mg/Kg-dry	1	7/17/2004 4:46:00 PM
Nickel	11	0.45		mg/Kg-dry	1	7/17/2004 4:46:00 PM
Silver	ND	0.23		mg/Kg-dry	1	7/17/2004 4:46:00 PM
Zinc	ND	0.45		mg/Kg-dry	1	7/17/2004 4:46:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		EPA 8270M			Prep Date: 7/14/2004	Analyst: DAH
2-Methylnaphthalene	ND	11		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Acenaphthene	ND	5.4		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Acenaphthylene	ND	16		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Anthracene	ND	11		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Benzo(a)anthracene	ND	11		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Benzo(a)pyrene	ND	11		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Benzo(b-k)fluoranthene	ND	22		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Benzo(g,h,i)perylene	ND	11		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Chrysene	ND	5.4		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Dibenzo(a,h)anthracene	ND	11		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Fluoranthene	ND	16		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Fluorene	ND	11		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Indeno(1,2,3-cd)pyrene	ND	11		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Naphthalene	ND	16		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Phenanthrene	ND	27		µg/Kg-dry	1	7/16/2004 8:28:00 AM
Pyrene	ND	16		µg/Kg-dry	1	7/16/2004 8:28:00 AM

Qualifiers:

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P - Dual Column results percent difference > 40%
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e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-4 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 12:45:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-10	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: DAH
1,1,1-Trichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,1,2,2-Tetrachloroethane	ND	64		µg/Kg-dry	100	7/12/2004
1,1,2-Trichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,1-Dichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,1-Dichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
1,2-Dichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,2-Dichloropropane	ND	43		µg/Kg-dry	100	7/12/2004
2-Butanone	ND	160		µg/Kg-dry	100	7/12/2004
2-Hexanone	ND	160		µg/Kg-dry	100	7/12/2004
4-Methyl-2-pentanone	ND	160		µg/Kg-dry	100	7/12/2004
Acetone	ND	480		µg/Kg-dry	100	7/12/2004
Benzene	ND	43		µg/Kg-dry	100	7/12/2004
Bromodichloromethane	ND	64		µg/Kg-dry	100	7/12/2004
Bromoform	ND	64		µg/Kg-dry	100	7/12/2004
Bromomethane	ND	160		µg/Kg-dry	100	7/12/2004
Carbon disulfide	ND	160		µg/Kg-dry	100	7/12/2004
Carbon tetrachloride	ND	43		µg/Kg-dry	100	7/12/2004
Chlorobenzene	ND	43		µg/Kg-dry	100	7/12/2004
Chloroethane	ND	160		µg/Kg-dry	100	7/12/2004
Chloroform	ND	43		µg/Kg-dry	100	7/12/2004
Chloromethane	ND	160		µg/Kg-dry	100	7/12/2004
cis-1,2-Dichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
cis-1,3-Dichloropropene	ND	43		µg/Kg-dry	100	7/12/2004
Dibromochloromethane	ND	64		µg/Kg-dry	100	7/12/2004
Ethylbenzene	ND	43		µg/Kg-dry	100	7/12/2004
m,p-Xylene	ND	64		µg/Kg-dry	100	7/12/2004
Methylene chloride	ND	210		µg/Kg-dry	100	7/12/2004
o-Xylene	ND	43		µg/Kg-dry	100	7/12/2004
Styrene	ND	43		µg/Kg-dry	100	7/12/2004
Tetrachloroethene	ND	43		µg/Kg-dry	100	7/12/2004
Toluene	ND	43		µg/Kg-dry	100	7/12/2004
trans-1,2-Dichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
trans-1,3-Dichloropropene	ND	43		µg/Kg-dry	100	7/12/2004
Trichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
Vinyl chloride	ND	64		µg/Kg-dry	100	7/12/2004
1,2-Dichloroethene, Total	ND	64		µg/Kg-dry	100	7/12/2004
1,3-Dichloropropene, Total	ND	64		µg/Kg-dry	100	7/12/2004
Xylenes, Total	ND	96		µg/Kg-dry	100	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE

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e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-4 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 12:45:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-10	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.53		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		CALCULATION				Analyst: JJG
Chromium, Trivalent	11	0.53		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		EPA 7196A			Prep Date: 7/14/2004	Analyst: JJG
Chromium, Hexavalent	ND	0.53		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		EPA 160.3				Analyst: KAE
Percent Moisture	6.0	0.010		% of sample	1	7/12/2004

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- P - Dual Column results percent difference > 40%
- E - Value above quantitation range
- H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	***Client Sample ID:***	SB-5 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 1:05:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-11	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS		**EPA 8082**			Prep Date: **7/15/2004**	Analyst: **RM**
Aroclor 1016	ND	40		µg/Kg-dry	1	7/17/2004 5:22:11 PM
Aroclor 1221	ND	40		µg/Kg-dry	1	7/17/2004 5:22:11 PM
Aroclor 1232	ND	40		µg/Kg-dry	1	7/17/2004 5:22:11 PM
Aroclor 1242	ND	40		µg/Kg-dry	1	7/17/2004 5:22:11 PM
Aroclor 1248	ND	40		µg/Kg-dry	1	7/17/2004 5:22:11 PM
Aroclor 1254	ND	40		µg/Kg-dry	1	7/17/2004 5:22:11 PM
Aroclor 1260	ND	40		µg/Kg-dry	1	7/17/2004 5:22:11 PM
MERCURY BY CVAA		**EPA 7471**			Prep Date: **7/16/2004**	Analyst: **JDA**
Mercury	0.015	0.012		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			Prep Date: **7/16/2004**	Analyst: **RM**
Aluminum	5,000	240		mg/Kg-dry	500	7/19/2004 4:49:00 PM
Arsenic	2.1	0.048		mg/Kg-dry	1	7/17/2004 4:51:00 PM
Cadmium	0.11	0.024		mg/Kg-dry	1	7/17/2004 4:51:00 PM
Chromium	15	0.24		mg/Kg-dry	1	7/17/2004 4:51:00 PM
Copper	8.2	0.48		mg/Kg-dry	1	7/17/2004 4:51:00 PM
Lead	23	0.48		mg/Kg-dry	1	7/17/2004 4:51:00 PM
Magnesium	1,300	1.4		mg/Kg-dry	1	7/17/2004 4:51:00 PM
Nickel	21	0.48		mg/Kg-dry	1	7/17/2004 4:51:00 PM
Silver	ND	0.24		mg/Kg-dry	1	7/17/2004 4:51:00 PM
Zinc	ND	0.48		mg/Kg-dry	1	7/17/2004 4:51:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	ND	9.8		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Acenaphthene	ND	4.9		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Acenaphthylene	ND	15		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Anthracene	ND	9.8		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Benzo(a)anthracene	160	9.8		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Benzo(a)pyrene	90	9.8		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Benzo(b-k)fluoranthene	150	20		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Benzo(g,h,i)perylene	55	9.8		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Chrysene	ND	4.9		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Dibenzo(a,h)anthracene	18	9.8		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Fluoranthene	94	15		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Fluorene	ND	9.8		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Indeno(1,2,3-cd)pyrene	46	9.8		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Naphthalene	ND	15		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Phenanthrene	61	25		µg/Kg-dry	1	7/16/2004 6:49:00 AM
Pyrene	220	15		µg/Kg-dry	1	7/16/2004 6:49:00 AM

Qualifiers:

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J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
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e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-5 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 1:05:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-11	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: DAH
1,1,1-Trichloroethane	ND	43		µg/Kg-dry	108	7/12/2004
1,1,2,2-Tetrachloroethane	ND	65		µg/Kg-dry	108	7/12/2004
1,1,2-Trichloroethane	ND	43		µg/Kg-dry	108	7/12/2004
1,1-Dichloroethane	ND	43		µg/Kg-dry	108	7/12/2004
1,1-Dichloroethene	ND	43		µg/Kg-dry	108	7/12/2004
1,2-Dichloroethane	ND	43		µg/Kg-dry	108	7/12/2004
1,2-Dichloropropane	ND	43		µg/Kg-dry	108	7/12/2004
2-Butanone	ND	160		µg/Kg-dry	108	7/12/2004
2-Hexanone	ND	160		µg/Kg-dry	108	7/12/2004
4-Methyl-2-pentanone	ND	160		µg/Kg-dry	108	7/12/2004
Acetone	ND	490		µg/Kg-dry	108	7/12/2004
Benzene	ND	43		µg/Kg-dry	108	7/12/2004
Bromodichloromethane	ND	65		µg/Kg-dry	108	7/12/2004
Bromoform	ND	65		µg/Kg-dry	108	7/12/2004
Bromomethane	*ND*	*160*		*µg/Kg-dry*	*108*	*7/12/2004*
Carbon disulfide	ND	160		µg/Kg-dry	108	7/12/2004
Carbon tetrachloride	ND	43		µg/Kg-dry	108	7/12/2004
Chlorobenzene	ND	43		µg/Kg-dry	108	7/12/2004
Chloroethane	ND	160		µg/Kg-dry	108	7/12/2004
Chloroform	ND	43		µg/Kg-dry	108	7/12/2004
Chloromethane	ND	160		µg/Kg-dry	108	7/12/2004
cis-1,2-Dichloroethene	ND	43		µg/Kg-dry	108	7/12/2004
cis-1,3-Dichloropropene	ND	43		µg/Kg-dry	108	7/12/2004
Dibromochloromethane	ND	65		µg/Kg-dry	108	7/12/2004
Ethylbenzene	ND	43		µg/Kg-dry	108	7/12/2004
m,p-Xylene	ND	65		µg/Kg-dry	108	7/12/2004
Methylene chloride	ND	220		µg/Kg-dry	108	7/12/2004
o-Xylene	ND	43		µg/Kg-dry	108	7/12/2004
Styrene	ND	43		µg/Kg-dry	108	7/12/2004
Tetrachloroethene	ND	43		µg/Kg-dry	108	7/12/2004
Toluene	ND	43		µg/Kg-dry	108	7/12/2004
trans-1,2-Dichloroethene	ND	43		µg/Kg-dry	108	7/12/2004
trans-1,3-Dichloropropene	ND	43		µg/Kg-dry	108	7/12/2004
Trichloroethene	ND	43		µg/Kg-dry	108	7/12/2004
Vinyl chloride	ND	65		µg/Kg-dry	108	7/12/2004
1,2-Dichloroethene, Total	ND	65		µg/Kg-dry	108	7/12/2004
1,3-Dichloropropene, Total	ND	65		µg/Kg-dry	108	7/12/2004
Xylenes, Total	ND	97		µg/Kg-dry	108	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE

Qualifiers:

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J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	***Client Sample ID:***	SB-5 (0-1')
Work Order:	0407134	***Collection Date:***	7/7/2004 1:05:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-11	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.50		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: JJG
Chromium, Trivalent	14	0.50		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: **7/14/2004**	Analyst: JJG
Chromium, Hexavalent	1.0	0.49		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: KAE
Percent Moisture	0.24	0.010		% of sample	1	7/12/2004

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-6 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 1:45:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-12	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS		EPA 8082			Prep Date: 7/15/2004	Analyst: RM
Aroclor 1016	ND	59		µg/Kg-dry	1	7/17/2004 7:14:06 PM
Aroclor 1221	ND	59		µg/Kg-dry	1	7/17/2004 7:14:06 PM
Aroclor 1232	ND	59		µg/Kg-dry	1	7/17/2004 7:14:06 PM
Aroclor 1242	ND	59		µg/Kg-dry	1	7/17/2004 7:14:06 PM
Aroclor 1248	ND	59		µg/Kg-dry	1	7/17/2004 7:14:06 PM
Aroclor 1254	ND	59		µg/Kg-dry	1	7/17/2004 7:14:06 PM
Aroclor 1260	ND	59		µg/Kg-dry	1	7/17/2004 7:14:06 PM
MERCURY BY CVAA		EPA 7471			Prep Date: 7/16/2004	Analyst: JDA
Mercury	ND	0.0092		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS		EPA 6020A			Prep Date: 7/16/2004	Analyst: RM
Aluminum	5,900	230		mg/Kg-dry	500	7/19/2004 4:54:00 PM
Arsenic	2.5	0.046		mg/Kg-dry	1	7/17/2004 6:24:00 PM
Cadmium	0.41	0.023		mg/Kg-dry	1	7/17/2004 6:24:00 PM
Chromium	13	0.23		mg/Kg-dry	1	7/17/2004 6:24:00 PM
Copper	32	0.46		mg/Kg-dry	1	7/17/2004 6:24:00 PM
Lead	23	0.46		mg/Kg-dry	1	7/17/2004 6:24:00 PM
Magnesium	2,100	1.4		mg/Kg-dry	1	7/17/2004 6:24:00 PM
Nickel	8.1	0.46		mg/Kg-dry	1	7/17/2004 6:24:00 PM
Silver	ND	0.23		mg/Kg-dry	1	7/17/2004 6:24:00 PM
Zinc	ND	0.46		mg/Kg-dry	1	7/17/2004 6:24:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		EPA 8270M			Prep Date: 7/14/2004	Analyst: DAH
2-Methylnaphthalene	34	11		*µg/Kg-dry*	1	*7/16/2004 11:13:00 AM*
Acenaphthene	ND	5.5		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Acenaphthylene	ND	16		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Anthracene	ND	11		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Benzo(a)anthracene	36	11		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Benzo(a)pyrene	74	11		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Benzo(b-k)fluoranthene	120	22		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Benzo(g,h,i)perylene	18	11		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Chrysene	40	5.5		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Dibenzo(a,h)anthracene	ND	11		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Fluoranthene	47	16		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Fluorene	ND	11		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Indeno(1,2,3-cd)pyrene	18	11		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Naphthalene	18	16		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Phenanthrene	90	27		µg/Kg-dry	1	7/16/2004 11:13:00 AM
Pyrene	70	16		µg/Kg-dry	1	7/16/2004 11:13:00 AM

Qualifiers:

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- * - Value exceeds Maximum Contaminant Level
- S - Spike Recovery outside accepted recovery limits
- P - Dual Column results percent difference > 40%
- E - Value above quantitation range
- H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-6 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 1:45:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-12	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: DAH
1,1,1-Trichloroethane	ND	44		µg/Kg-dry	105	7/12/2004
1,1,2,2-Tetrachloroethane	ND	66		µg/Kg-dry	105	7/12/2004
1,1,2-Trichloroethane	ND	44		µg/Kg-dry	105	7/12/2004
1,1-Dichloroethane	ND	44		µg/Kg-dry	105	7/12/2004
1,1-Dichloroethene	ND	44		µg/Kg-dry	105	7/12/2004
1,2-Dichloroethane	ND	44		µg/Kg-dry	105	7/12/2004
1,2-Dichloropropane	ND	44		µg/Kg-dry	105	7/12/2004
2-Butanone	ND	160		µg/Kg-dry	105	7/12/2004
2-Hexanone	ND	160		µg/Kg-dry	105	7/12/2004
4-Methyl-2-pentanone	ND	160		µg/Kg-dry	105	7/12/2004
Acetone	ND	490		µg/Kg-dry	105	7/12/2004
Benzene	ND	44		µg/Kg-dry	105	7/12/2004
Bromodichloromethane	ND	66		µg/Kg-dry	105	7/12/2004
Bromoform	ND	66		µg/Kg-dry	105	7/12/2004
Bromomethane	ND	160		µg/Kg-dry	105	7/12/2004
Carbon disulfide	ND	160		µg/Kg-dry	105	7/12/2004
Carbon tetrachloride	ND	44		µg/Kg-dry	105	7/12/2004
Chlorobenzene	ND	44		µg/Kg-dry	105	7/12/2004
Chloroethane	ND	160		µg/Kg-dry	105	7/12/2004
Chloroform	ND	44		µg/Kg-dry	105	7/12/2004
Chloromethane	ND	160		µg/Kg-dry	105	7/12/2004
cis-1,2-Dichloroethene	ND	44		µg/Kg-dry	105	7/12/2004
cis-1,3-Dichloropropene	ND	44		µg/Kg-dry	105	7/12/2004
Dibromochloromethane	ND	66		µg/Kg-dry	105	7/12/2004
Ethylbenzene	58	44		µg/Kg-dry	105	7/12/2004
m,p-Xylene	ND	66		µg/Kg-dry	105	7/12/2004
Methylene chloride	ND	220		µg/Kg-dry	105	7/12/2004
o-Xylene	98	44		µg/Kg-dry	105	7/12/2004
Styrene	ND	44		µg/Kg-dry	105	7/12/2004
Tetrachloroethene	ND	44		µg/Kg-dry	105	7/12/2004
Toluene	ND	44		µg/Kg-dry	105	7/12/2004
trans-1,2-Dichloroethene	ND	44		µg/Kg-dry	105	7/12/2004
trans-1,3-Dichloropropene	ND	44		µg/Kg-dry	105	7/12/2004
Trichloroethene	ND	44		µg/Kg-dry	105	7/12/2004
Vinyl chloride	ND	66		µg/Kg-dry	105	7/12/2004
1,2-Dichloroethene, Total	ND	66		µg/Kg-dry	105	7/12/2004
1,3-Dichloropropene, Total	ND	66		µg/Kg-dry	105	7/12/2004
Xylenes, Total	ND	99		µg/Kg-dry	105	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE

Qualifiers:

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P - Dual Column results percent difference > 40%
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e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-6 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 1:45:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-12	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.52		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: JJG
Chromium, Trivalent	11	0.52		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: 7/14/2004	Analyst: JJG
Chromium, Hexavalent	2.1	0.52		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: KAE
Percent Moisture	4.4	0.010		% of sample	1	7/12/2004

Qualifiers:	ND - Not Detected at the Reporting Limit	S - Spike Recovery outside accepted recovery limits
	J - Analyte detected below quantitation limits	P - Dual Column results percent difference > 40%
	B - Analyte detected in the associated Method Blank	E - Value above quantitation range
	* - Value exceeds Maximum Contaminant Level	H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-7 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 3:00:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-13	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS		EPA 8082			Prep Date: 7/15/2004	Analyst: RM
Aroclor 1016	ND	43		µg/Kg-dry	1	7/17/2004 7:51:27 PM
Aroclor 1221	ND	43		µg/Kg-dry	1	7/17/2004 7:51:27 PM
Aroclor 1232	ND	43		µg/Kg-dry	1	7/17/2004 7:51:27 PM
Aroclor 1242	ND	43		µg/Kg-dry	1	7/17/2004 7:51:27 PM
Aroclor 1248	ND	43		µg/Kg-dry	1	7/17/2004 7:51:27 PM
Aroclor 1254	ND	43		µg/Kg-dry	1	7/17/2004 7:51:27 PM
Aroclor 1260	ND	43		µg/Kg-dry	1	7/17/2004 7:51:27 PM
MERCURY BY CVAA		EPA 7471			Prep Date: 7/16/2004	Analyst: JDA
Mercury	ND	0.016		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS		EPA 6020A			Prep Date: 7/16/2004	Analyst: RM
Aluminum	5,500	220		mg/Kg-dry	500	7/19/2004 4:58:00 PM
Arsenic	2.5	0.045		mg/Kg-dry	1	7/17/2004 6:29:00 PM
Cadmium	0.065	0.022		mg/Kg-dry	1	7/17/2004 6:29:00 PM
Chromium	7.4	0.22		mg/Kg-dry	1	7/17/2004 6:29:00 PM
Copper	11	0.45		mg/Kg-dry	1	7/17/2004 6:29:00 PM
Lead	6.6	0.45		mg/Kg-dry	1	7/17/2004 6:29:00 PM
Magnesium	3,100	1.3		mg/Kg-dry	1	7/17/2004 6:29.00 PM
Nickel	9.3	0.45		mg/Kg-dry	1	7/17/2004 6:29.00 PM
Silver	ND	0.22		mg/Kg-dry	1	7/17/2004 6:29:00 PM
Zinc	ND	0 45		mg/Kg-dry	1	7/17/2004 6:29.00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		EPA 8270M			Prep Date: 7/14/2004	Analyst: DAH
2-Methylnaphthalene	12	11		µg/Kg-dry	1	7/16/2004 9:01:00 AM
Acenaphthene	ND	5 5		µg/Kg-dry	1	7/16/2004 9:01:00 AM
Acenaphthylene	ND	17		µg/Kg-dry	1	7/16/2004 9:01:00 AM
Anthracene	ND	11		µg/Kg-dry	1	7/16/2004 9:01.00 AM
Benzo(a)anthracene	130	11		µg/Kg-dry	1	7/16/2004 9.01:00 AM
Benzo(a)pyrene	100	11		µg/Kg-dry	1	7/16/2004 9:01:00 AM
Benzo(b-k)fluoranthene	110	22		µg/Kg-dry	1	7/16/2004 9:01:00 AM
Benzo(g,h,i)perylene	25	11		µg/Kg-dry	1	7/16/2004 9:01:00 AM
Chrysene	30	5.5		µg/Kg-dry	1	7/16/2004 9:01:00 AM
Dibenzo(a,h)anthracene	ND	11		µg/Kg-dry	1	7/16/2004 9:01:00 AM
Fluoranthene	53	17		µg/Kg-dry	1	7/16/2004 9:01:00 AM
Fluorene	13	11		µg/Kg-dry	1	7/16/2004 9:01:00 AM
Indeno(1,2,3-cd)pyrene	21	11		µg/Kg-dry	1	7/16/2004 9:01:00 AM
Naphthalene	ND	17		µg/Kg-dry	1	7/16/2004 9:01.00 AM
Phenanthrene	89	28		µg/Kg-dry	1	7/16/2004 9:01.00 AM
Pyrene	93	17		µg/Kg-dry	1	7/16/2004 9:01:00 AM

Qualifiers:

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* - Value exceeds Maximum Contaminant Level
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P - Dual Column results percent difference > 40%
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e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-7 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 3:00:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-13	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: DAH
1,1,1-Trichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,1,2,2-Tetrachloroethane	ND	64		µg/Kg-dry	100	7/12/2004
1,1,2-Trichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,1-Dichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,1-Dichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
1,2-Dichloroethane	ND	43		µg/Kg-dry	100	7/12/2004
1,2-Dichloropropane	ND	43		µg/Kg-dry	100	7/12/2004
2-Butanone	ND	160		µg/Kg-dry	100	7/12/2004
2-Hexanone	ND	160		µg/Kg-dry	100	7/12/2004
4-Methyl-2-pentanone	ND	160		µg/Kg-dry	100	7/12/2004
Acetone	ND	480		µg/Kg-dry	100	7/12/2004
Benzene	ND	43		µg/Kg-dry	100	7/12/2004
Bromodichloromethane	ND	64		µg/Kg-dry	100	7/12/2004
Bromoform	ND	64		µg/Kg-dry	100	7/12/2004
Bromomethane	ND	160		µg/Kg-dry	100	7/12/2004
Carbon disulfide	ND	160		µg/Kg-dry	100	7/12/2004
Carbon tetrachloride	ND	43		µg/Kg-dry	100	7/12/2004
Chlorobenzene	ND	43		µg/Kg-dry	100	7/12/2004
Chloroethane	ND	160		µg/Kg-dry	100	7/12/2004
Chloroform	ND	43		µg/Kg-dry	100	7/12/2004
Chloromethane	ND	160		µg/Kg-dry	100	7/12/2004
cis-1,2-Dichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
cis-1,3-Dichloropropene	ND	43		µg/Kg-dry	100	7/12/2004
Dibromochloromethane	ND	64		µg/Kg-dry	100	7/12/2004
Ethylbenzene	ND	43		µg/Kg-dry	100	7/12/2004
m,p-Xylene	ND	64		µg/Kg-dry	100	7/12/2004
Methylene chloride	ND	210		µg/Kg-dry	100	7/12/2004
o-Xylene	ND	43		µg/Kg-dry	100	7/12/2004
Styrene	ND	43		µg/Kg-dry	100	7/12/2004
Tetrachloroethene	ND	43		µg/Kg-dry	100	7/12/2004
Toluene	ND	43		µg/Kg-dry	100	7/12/2004
trans-1,2-Dichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
trans-1,3-Dichloropropene	ND	43		µg/Kg-dry	100	7/12/2004
Trichloroethene	ND	43		µg/Kg-dry	100	7/12/2004
Vinyl chloride	ND	64		µg/Kg-dry	100	7/12/2004
1,2-Dichloroethene, Total	ND	64		µg/Kg-dry	100	7/12/2004
1,3-Dichloropropene, Total	ND	64		µg/Kg-dry	100	7/12/2004
Xylenes, Total	ND	97		µg/Kg-dry	100	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE

Qualifiers:

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P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-7 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 3:00:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-13	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.54		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: JJG
Chromium, Trivalent	6.7	0.54		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: 7/14/2004	Analyst: JJG
Chromium, Hexavalent	0.74	0.51		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: KAE
Percent Moisture	6.9	0.010		% of sample	1	7/12/2004

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-10 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 4:00:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-14	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS			**EPA 8082**		Prep Date: **7/15/2004**	Analyst: **RM**
Aroclor 1016	ND	56		µg/Kg-dry	1	7/17/2004 8:28:41 PM
Aroclor 1221	ND	56		µg/Kg-dry	1	7/17/2004 8:28:41 PM
Aroclor 1232	ND	56		µg/Kg-dry	1	7/17/2004 8:28:41 PM
Aroclor 1242	ND	56		µg/Kg-dry	1	7/17/2004 8:28:41 PM
Aroclor 1248	ND	56		µg/Kg-dry	1	7/17/2004 8:28:41 PM
Aroclor 1254	ND	56		µg/Kg-dry	1	7/17/2004 8:28:41 PM
Aroclor 1260	ND	56		µg/Kg-dry	1	7/17/2004 8:28:41 PM
MERCURY BY CVAA			**EPA 7471**		Prep Date: **7/16/2004**	Analyst: **JDA**
Mercury	0.013	0.0062		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS			**EPA 6020A**		Prep Date: **7/16/2004**	Analyst: **RM**
Aluminum	6,100	230		mg/Kg-dry	500	7/19/2004 5:03:00 PM
Arsenic	2.2	0.045		mg/Kg-dry	1	7/17/2004 6:34:00 PM
Cadmium	0.44	0.023		mg/Kg-dry	1	7/17/2004 6:34:00 PM
Chromium	8.8	0.23		mg/Kg-dry	1	7/17/2004 6:34:00 PM
Copper	150	4.5		mg/Kg-dry	10	7/18/2004 8:12:00 PM
Lead	75	4.5		mg/Kg-dry	10	7/18/2004 8:12:00 PM
Magnesium	7,000	14		mg/Kg-dry	10	7/18/2004 8:12:00 PM
Nickel	10	0.45		mg/Kg-dry	1	7/17/2004 6:34:00 PM
Silver	ND	0.23		mg/Kg-dry	1	7/17/2004 6:34:00 PM
Zinc	ND	0.45		mg/Kg-dry	1	7/17/2004 6:34:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM			**EPA 8270M**		Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	28	11		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Acenaphthene	11	5.3		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Acenaphthylene	30	16		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Anthracene	33	11		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Benzo(a)anthracene	150	11		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Benzo(a)pyrene	240	11		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Benzo(b-k)fluoranthene	500	110		µg/Kg-dry	5	7/21/2004 12:54:00 PM
Benzo(g,h,i)perylene	77	11		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Chrysene	ND	5.3		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Dibenzo(a,h)anthracene	41	11		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Fluoranthene	180	16		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Fluorene	19	11		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Indeno(1,2,3-cd)pyrene	90	11		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Naphthalene	23	16		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Phenanthrene	280	27		µg/Kg-dry	1	7/16/2004 11:46:00 AM
Pyrene	310	80		µg/Kg-dry	5	7/21/2004 12:54:00 PM

Qualifiers:

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S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-10 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 4:00:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-14	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: DAH
1,1,1-Trichloroethane	ND	43		µg/Kg-dry	105	7/12/2004
1,1,2,2-Tetrachloroethane	ND	65		µg/Kg-dry	105	7/12/2004
1,1,2-Trichloroethane	ND	43		µg/Kg-dry	105	7/12/2004
1,1-Dichloroethane	ND	43		µg/Kg-dry	105	7/12/2004
1,1-Dichloroethene	ND	43		µg/Kg-dry	105	7/12/2004
1,2-Dichloroethane	ND	43		µg/Kg-dry	105	7/12/2004
1,2-Dichloropropane	ND	43		µg/Kg-dry	105	7/12/2004
2-Butanone	ND	160		µg/Kg-dry	105	7/12/2004
2-Hexanone	ND	160		µg/Kg-dry	105	7/12/2004
4-Methyl-2-pentanone	ND	160		µg/Kg-dry	105	7/12/2004
Acetone	ND	490		µg/Kg-dry	105	7/12/2004
Benzene	ND	43		µg/Kg-dry	105	7/12/2004
Bromodichloromethane	ND	65		µg/Kg-dry	105	7/12/2004
Bromoform	ND	65		µg/Kg-dry	105	7/12/2004
Bromomethane	ND	160		µg/Kg-dry	105	7/12/2004
Carbon disulfide	ND	160		µg/Kg-dry	105	7/12/2004
Carbon tetrachloride	ND	43		µg/Kg-dry	105	7/12/2004
Chlorobenzene	ND	43		µg/Kg-dry	105	7/12/2004
Chloroethane	ND	160		µg/Kg-dry	105	7/12/2004
Chloroform	ND	43		µg/Kg-dry	105	7/12/2004
Chloromethane	ND	160		µg/Kg-dry	105	7/12/2004
cis-1,2-Dichloroethene	ND	43		µg/Kg-dry	105	7/12/2004
cis-1,3-Dichloropropene	ND	43		µg/Kg-dry	105	7/12/2004
Dibromochloromethane	ND	65		µg/Kg-dry	105	7/12/2004
Ethylbenzene	ND	43		µg/Kg-dry	105	7/12/2004
m,p-Xylene	ND	65		µg/Kg-dry	105	7/12/2004
Methylene chloride	ND	220		µg/Kg-dry	105	7/12/2004
o-Xylene	ND	43		µg/Kg-dry	105	7/12/2004
Styrene	ND	43		µg/Kg-dry	105	7/12/2004
Tetrachloroethene	ND	43		µg/Kg-dry	105	7/12/2004
Toluene	ND	43		µg/Kg-dry	105	7/12/2004
trans-1,2-Dichloroethene	ND	43		µg/Kg-dry	105	7/12/2004
trans-1,3-Dichloropropene	ND	43		µg/Kg-dry	105	7/12/2004
Trichloroethene	ND	43		µg/Kg-dry	105	7/12/2004
Vinyl chloride	ND	65		µg/Kg-dry	105	7/12/2004
1,2-Dichloroethene, Total	ND	65		µg/Kg-dry	105	7/12/2004
1,3-Dichloropropene, Total	ND	65		µg/Kg-dry	105	7/12/2004
Xylenes, Total	ND	97		µg/Kg-dry	105	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE

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P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-10 (0-1')
Work Order:	0407134	**Collection Date:**	7/7/2004 4:00:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-14	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.51		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: JJG
Chromium, Trivalent	8.1	0.51		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: **7/14/2004**	Analyst: JJG
Chromium, Hexavalent	0.69	0.50		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: KAE
Percent Moisture	2.9	0.010		% of sample	1	7/12/2004

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- S - Spike Recovery outside accepted recovery limits
- P - Dual Column results percent difference > 40%
- E - Value above quantitation range
- H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-12 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 11:45:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-15	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS		EPA 8082			Prep Date: 7/15/2004	Analyst: RM
Aroclor 1016	ND	59		µg/Kg-dry	1	7/17/2004 9:06:03 PM
Aroclor 1221	ND	59		µg/Kg-dry	1	7/17/2004 9:06:03 PM
Aroclor 1232	ND	59		µg/Kg-dry	1	7/17/2004 9:06:03 PM
Aroclor 1242	ND	59		µg/Kg-dry	1	7/17/2004 9:06:03 PM
Aroclor 1248	ND	59		µg/Kg-dry	1	7/17/2004 9:06:03 PM
Aroclor 1254	ND	59		µg/Kg-dry	1	7/17/2004 9:06:03 PM
Aroclor 1260	ND	59		µg/Kg-dry	1	7/17/2004 9:06:03 PM
MERCURY BY CVAA		EPA 7471			Prep Date: 7/16/2004	Analyst: JDA
Mercury	0.033	0.013		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS		EPA 6020A			Prep Date: 7/16/2004	Analyst: RM
Aluminum	4,200	48		mg/Kg-dry	100	7/19/2004 12:10:00 AM
Arsenic	12	0.048		mg/Kg-dry	1	7/17/2004 6:38:00 PM
Cadmium	0.92	0.024		mg/Kg-dry	1	7/17/2004 6:38:00 PM
Chromium	6.3	0.24		mg/Kg-dry	1	7/17/2004 6:38:00 PM
Copper	30	0.48		mg/Kg-dry	1	7/17/2004 6:38:00 PM
Lead	48	4.8		mg/Kg-dry	10	7/18/2004 8:16:00 PM
Magnesium	3,000	1.4		mg/Kg-dry	1	7/17/2004 6:38:00 PM
Nickel	9.2	0.48		mg/Kg-dry	1	7/17/2004 6:38:00 PM
Silver	ND	0.24		mg/Kg-dry	1	7/17/2004 6:38:00 PM
Zinc	ND	0.48		mg/Kg-dry	1	7/17/2004 6:38:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		EPA 8270M			Prep Date: 7/14/2004	Analyst: DAH
2-Methylnaphthalene	390	280		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Acenaphthene	380	140		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Acenaphthylene	89	17		µg/Kg-dry	1	7/16/2004 2:32:00 PM
Anthracene	2,100	280		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Benzo(a)anthracene	2,800	280		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Benzo(a)pyrene	1,800	280		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Benzo(b-k)fluoranthene	3,600	560		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Benzo(g,h,i)perylene	1,500	280		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Chrysene	ND	5.6		µg/Kg-dry	1	7/16/2004 2:32:00 PM
Dibenzo(a,h)anthracene	640	280		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Fluoranthene	6,200	420		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Fluorene	380	280		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Indeno(1,2,3-cd)pyrene	1,700	280		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Naphthalene	450	420		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Phenanthrene	2,900	700		µg/Kg-dry	25	7/21/2004 1:27:00 AM
Pyrene	3,800	420		µg/Kg-dry	25	7/21/2004 1:27:00 AM

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e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-12 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 11:45:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-15	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: DAH
1,1,1-Trichloroethane	ND	44		µg/Kg-dry	100	7/12/2004
1,1,2,2-Tetrachloroethane	ND	65		µg/Kg-dry	100	7/12/2004
1,1,2-Trichloroethane	ND	44		µg/Kg-dry	100	7/12/2004
1,1-Dichloroethane	ND	44		µg/Kg-dry	100	7/12/2004
1,1-Dichloroethene	ND	44		µg/Kg-dry	100	7/12/2004
1,2-Dichloroethane	ND	44		µg/Kg-dry	100	7/12/2004
1,2-Dichloropropane	ND	44		µg/Kg-dry	100	7/12/2004
2-Butanone	ND	160		µg/Kg-dry	100	7/12/2004
2-Hexanone	ND	160		µg/Kg-dry	100	7/12/2004
4-Methyl-2-pentanone	ND	160		µg/Kg-dry	100	7/12/2004
Acetone	ND	490		µg/Kg-dry	100	7/12/2004
Benzene	570	44		µg/Kg-dry	100	7/12/2004
Bromodichloromethane	ND	65		µg/Kg-dry	100	7/12/2004
Bromoform	ND	65		µg/Kg-dry	100	7/12/2004
Bromomethane	ND	160		µg/Kg-dry	100	7/12/2004
Carbon disulfide	ND	160		µg/Kg-dry	100	7/12/2004
Carbon tetrachloride	ND	44		µg/Kg-dry	100	7/12/2004
Chlorobenzene	ND	44		µg/Kg-dry	100	7/12/2004
Chloroethane	ND	160		µg/Kg-dry	100	7/12/2004
Chloroform	96	44		µg/Kg-dry	100	7/12/2004
Chloromethane	ND	160		µg/Kg-dry	100	7/12/2004
cis-1,2-Dichloroethene	ND	44		µg/Kg-dry	100	7/12/2004
cis-1,3-Dichloropropene	ND	44		µg/Kg-dry	100	7/12/2004
Dibromochloromethane	ND	65		µg/Kg-dry	100	7/12/2004
Ethylbenzene	210	44		µg/Kg-dry	100	7/12/2004
m,p-Xylene	950	65		µg/Kg-dry	100	7/12/2004
Methylene chloride	ND	220		µg/Kg-dry	100	7/12/2004
o-Xylene	800	44		µg/Kg-dry	100	7/12/2004
Styrene	ND	44		µg/Kg-dry	100	7/12/2004
Tetrachloroethene	ND	44		µg/Kg-dry	100	7/12/2004
Toluene	2,000	44		µg/Kg-dry	100	7/12/2004
trans-1,2-Dichloroethene	ND	44		µg/Kg-dry	100	7/12/2004
trans-1,3-Dichloropropene	ND	44		µg/Kg-dry	100	7/12/2004
Trichloroethene	ND	44		µg/Kg-dry	100	7/12/2004
Vinyl chloride	ND	65		µg/Kg-dry	100	7/12/2004
1,2-Dichloroethene, Total	ND	65		µg/Kg-dry	100	7/12/2004
1,3-Dichloropropene, Total	ND	65		µg/Kg-dry	100	7/12/2004
Xylenes, Total	1,700	98		µg/Kg-dry	100	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE

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e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-12 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 11:45:00 AM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-15	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.55		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: JJG
Chromium, Trivalent	5.0	0.55		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: **7/14/2004**	Analyst: JJG
Chromium, Hexavalent	1.3	0.53		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: KAE
Percent Moisture	8.4	0.010		% of sample	1	7/12/2004

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- P - Dual Column results percent difference > 40%
- E - Value above quantitation range
- H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-14 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 1:15:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-16	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS		**EPA 8082**			**Prep Date: 7/15/2004**	**Analyst: RM**
Aroclor 1016	ND	53		µg/Kg-dry	1	7/17/2004 9:43:18 PM
Aroclor 1221	ND	53		µg/Kg-dry	1	7/17/2004 9:43:18 PM
Aroclor 1232	ND	53		µg/Kg-dry	1	7/17/2004 9:43:18 PM
Aroclor 1242	ND	53		µg/Kg-dry	1	7/17/2004 9:43:18 PM
Aroclor 1248	ND	53		µg/Kg-dry	1	7/17/2004 9:43:18 PM
Aroclor 1254	ND	53		µg/Kg-dry	1	7/17/2004 9:43:18 PM
Aroclor 1260	ND	53		µg/Kg-dry	1	7/17/2004 9:43:18 PM
MERCURY BY CVAA		**EPA 7471**			**Prep Date: 7/16/2004**	**Analyst: JDA**
Mercury	0.065	0.0074		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			**Prep Date: 7/16/2004**	**Analyst: RM**
Aluminum	5,800	240		mg/Kg-dry	500	7/19/2004 5:08:00 PM
Arsenic	4.1	0.049		mg/Kg-dry	1	7/17/2004 6:43:00 PM
Cadmium	0.49	0.024		mg/Kg-dry	1	7/17/2004 6:43:00 PM
Chromium	12	0.24		mg/Kg-dry	1	7/17/2004 6:43:00 PM
Copper	130	4.9		mg/Kg-dry	10	7/18/2004 8:21:00 PM
Lead	68	4.9		mg/Kg-dry	10	7/18/2004 8:21:00 PM
Magnesium	3,000	1.5		mg/Kg-dry	1	7/17/2004 6:43:00 PM
Nickel	36	0.49		mg/Kg-dry	1	7/17/2004 6:43.00 PM
Silver	ND	0.24		mg/Kg-dry	1	7/17/2004 6:43:00 PM
Zinc	ND	0.49		mg/Kg-dry	1	7/17/2004 6:43:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			**Prep Date: 7/14/2004**	**Analyst: DAH**
2-Methylnaphthalene	190	10		µg/Kg-dry	1	7/16/2004 12:53:00 PM
Acenaphthene	67	5.1		µg/Kg-dry	1	7/16/2004 12:53.00 PM
Acenaphthylene	67	15		µg/Kg-dry	1	7/16/2004 12:53:00 PM
Anthracene	310	10		µg/Kg-dry	1	7/16/2004 12:53:00 PM
Benzo(a)anthracene	1,500	100		µg/Kg-dry	10	7/21/2004 2:00:00 AM
Benzo(a)pyrene	950	100		µg/Kg-dry	10	7/21/2004 2.00:00 AM
Benzo(b-k)fluoranthene	1,400	210		µg/Kg-dry	10	7/21/2004 2:00:00 AM
Benzo(g,h,i)perylene	420	100		µg/Kg-dry	10	7/21/2004 2:00:00 AM
Chrysene	ND	5.1		µg/Kg-dry	1	7/16/2004 12:53:00 PM
Dibenzo(a,h)anthracene	360	100		µg/Kg-dry	10	7/21/2004 2:00:00 AM
Fluoranthene	1,800	150		µg/Kg-dry	10	7/21/2004 2:00:00 AM
Fluorene	90	10		µg/Kg-dry	1	7/16/2004 12:53.00 PM
Indeno(1,2,3-cd)pyrene	710	100		µg/Kg-dry	10	7/21/2004 2:00:00 AM
Naphthalene	160	15		µg/Kg-dry	1	7/16/2004 12:53:00 PM
Phenanthrene	960	260		µg/Kg-dry	10	7/21/2004 2:00.00 AM
Pyrene	1,900	15		µg/Kg-dry	1	7/16/2004 12:53:00 PM

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P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-14 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 1:15:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-16	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: **DAH**
1,1,1-Trichloroethane	ND	46		µg/Kg-dry	108	7/12/2004
1,1,2,2-Tetrachloroethane	ND	69		µg/Kg-dry	108	7/12/2004
1,1,2-Trichloroethane	ND	46		µg/Kg-dry	108	7/12/2004
1,1-Dichloroethane	ND	46		µg/Kg-dry	108	7/12/2004
1,1-Dichloroethene	ND	46		µg/Kg-dry	108	7/12/2004
1,2-Dichloroethane	ND	46		µg/Kg-dry	108	7/12/2004
1,2-Dichloropropane	ND	46		µg/Kg-dry	108	7/12/2004
2-Butanone	ND	170		µg/Kg-dry	108	7/12/2004
2-Hexanone	ND	170		µg/Kg-dry	108	7/12/2004
4-Methyl-2-pentanone	ND	170		µg/Kg-dry	108	7/12/2004
Acetone	ND	510		µg/Kg-dry	108	7/12/2004
Benzene	ND	46		µg/Kg-dry	108	7/12/2004
Bromodichloromethane	ND	69		µg/Kg-dry	108	7/12/2004
Bromoform	ND	69		µg/Kg-dry	108	7/12/2004
Bromomethane	ND	170		µg/Kg-dry	108	7/12/2004
Carbon disulfide	ND	170		µg/Kg-dry	108	7/12/2004
Carbon tetrachloride	ND	46		µg/Kg-dry	108	7/12/2004
Chlorobenzene	ND	46		µg/Kg-dry	108	7/12/2004
Chloroethane	ND	170		µg/Kg-dry	108	7/12/2004
Chloroform	ND	46		µg/Kg-dry	108	7/12/2004
Chloromethane	ND	170		µg/Kg-dry	108	7/12/2004
cis-1,2-Dichloroethene	ND	46		µg/Kg-dry	108	7/12/2004
cis-1,3-Dichloropropene	ND	46		µg/Kg-dry	108	7/12/2004
Dibromochloromethane	ND	69		µg/Kg-dry	108	7/12/2004
Ethylbenzene	ND	46		µg/Kg-dry	108	7/12/2004
m,p-Xylene	ND	69		µg/Kg-dry	108	7/12/2004
Methylene chloride	ND	230		µg/Kg-dry	108	7/12/2004
o-Xylene	70	46		µg/Kg-dry	108	7/12/2004
Styrene	ND	46		µg/Kg-dry	108	7/12/2004
Tetrachloroethene	ND	46		µg/Kg-dry	108	7/12/2004
Toluene	75	46		µg/Kg-dry	108	7/12/2004
trans-1,2-Dichloroethene	ND	46		µg/Kg-dry	108	7/12/2004
trans-1,3-Dichloropropene	ND	46		µg/Kg-dry	108	7/12/2004
Trichloroethene	2,700	46		µg/Kg-dry	108	7/12/2004
Vinyl chloride	ND	69		µg/Kg-dry	108	7/12/2004
1,2-Dichloroethene, Total	ND	69		µg/Kg-dry	108	7/12/2004
1,3-Dichloropropene, Total	ND	69		µg/Kg-dry	108	7/12/2004
Xylenes, Total	ND	100		µg/Kg-dry	108	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: **KAE**

Qualifiers:

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B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-14 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 1:15:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-16	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.53		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: JJG
Chromium, Trivalent	10	0.53		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: **7/14/2004**	Analyst: JJG
Chromium, Hexavalent	1.4	0.52		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: KAE
Percent Moisture	5.5	0.010		% of sample	1	7/12/2004

Qualifiers:

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J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-15 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 2:00:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-17	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS		**EPA 8082**			Prep Date: **7/15/2004**	Analyst: **RM**
Aroclor 1016	ND	57		µg/Kg-dry	1	7/17/2004 10:20:00 PM
Aroclor 1221	ND	57		µg/Kg-dry	1	7/17/2004 10:20:00 PM
Aroclor 1232	ND	57		µg/Kg-dry	1	7/17/2004 10:20:00 PM
Aroclor 1242	ND	57		µg/Kg-dry	1	7/17/2004 10:20:00 PM
Aroclor 1248	ND	57		µg/Kg-dry	1	7/17/2004 10:20:00 PM
Aroclor 1254	ND	57		µg/Kg-dry	1	7/17/2004 10:20:00 PM
Aroclor 1260	ND	57		µg/Kg-dry	1	7/17/2004 10:20:00 PM
MERCURY BY CVAA		**EPA 7471**			Prep Date: **7/16/2004**	Analyst: **JDA**
Mercury	0.015	0.0079		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			Prep Date: **7/16/2004**	Analyst: **RM**
Aluminum	5,500	240		mg/Kg-dry	500	7/19/2004 5:13:00 PM
Arsenic	3.1	0.049		mg/Kg-dry	1	7/17/2004 6:48:00 PM
Cadmium	0.093	0.024		mg/Kg-dry	1	7/17/2004 6:48:00 PM
Chromium	5.7	0.24		mg/Kg-dry	1	7/17/2004 6:48:00 PM
Copper	4.6	0.49		mg/Kg-dry	1	7/17/2004 6:48:00 PM
Lead	6.9	0.49		mg/Kg-dry	1	7/17/2004 6:48:00 PM
Magnesium	2,900	1.5		mg/Kg-dry	1	7/17/2004 6:48:00 PM
Nickel	7.7	0.49		mg/Kg-dry	1	7/17/2004 6:48:00 PM
Silver	ND	0.24		mg/Kg-dry	1	7/17/2004 6:48:00 PM
Zinc	ND	0.49		mg/Kg-dry	1	7/17/2004 6:48:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	11	9.9		µg/Kg-dry	1	7/16/2004 1:26:00 PM
Acenaphthene	5.9	4.9		µg/Kg-dry	1	7/16/2004 1:26:00 PM
Acenaphthylene	ND	15		µg/Kg-dry	1	7/16/2004 1:26:00 PM
Anthracene	ND	9.9		µg/Kg-dry	1	7/16/2004 1:26:00 PM
Benzo(a)anthracene	66	49		µg/Kg-dry	5	7/21/2004 2:33:00 AM
Benzo(a)pyrene	ND	49		µg/Kg-dry	5	7/21/2004 2:33:00 AM
Benzo(b+k)fluoranthene	ND	99		µg/Kg-dry	5	7/21/2004 2:33:00 AM
Benzo(g,h,i)perylene	ND	49		µg/Kg-dry	5	7/21/2004 2:33:00 AM
Chrysene	100	25		µg/Kg-dry	5	7/21/2004 2:33:00 AM
Dibenzo(a,h)anthracene	ND	49		µg/Kg-dry	5	7/21/2004 2:33:00 AM
Fluoranthene	38	15		µg/Kg-dry	1	7/16/2004 1:26:00 PM
Fluorene	11	9.9		µg/Kg-dry	1	7/16/2004 1:26:00 PM
Indeno(1,2,3-cd)pyrene	ND	49		µg/Kg-dry	5	7/21/2004 2:33:00 AM
Naphthalene	ND	15		µg/Kg-dry	1	7/16/2004 1:26:00 PM
Phenanthrene	49	25		µg/Kg-dry	1	7/16/2004 1:26:00 PM
Pyrene	ND	74		µg/Kg-dry	5	7/21/2004 2:33:00 AM

Qualifiers:

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P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-15 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 2:00:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-17	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: DAH
1,1,1-Trichloroethane	ND	42		µg/Kg-dry	100	7/12/2004
1,1,2,2-Tetrachloroethane	ND	63		µg/Kg-dry	100	7/12/2004
1,1,2-Trichloroethane	ND	42		µg/Kg-dry	100	7/12/2004
1,1-Dichloroethane	ND	42		µg/Kg-dry	100	7/12/2004
1,1-Dichloroethene	ND	42		µg/Kg-dry	100	7/12/2004
1,2-Dichloroethane	ND	42		µg/Kg-dry	100	7/12/2004
1,2-Dichloropropane	ND	42		µg/Kg-dry	100	7/12/2004
2-Butanone	ND	160		µg/Kg-dry	100	7/12/2004
2-Hexanone	ND	160		µg/Kg-dry	100	7/12/2004
4-Methyl-2-pentanone	ND	160		µg/Kg-dry	100	7/12/2004
Acetone	ND	470		µg/Kg-dry	100	7/12/2004
Benzene	ND	42		µg/Kg-dry	100	7/12/2004
Bromodichloromethane	ND	63		µg/Kg-dry	100	7/12/2004
Bromoform	ND	63		µg/Kg-dry	100	7/12/2004
Bromomethane	ND	160		µg/Kg-dry	100	7/12/2004
Carbon disulfide	ND	160		µg/Kg-dry	100	7/12/2004
Carbon tetrachloride	ND	42		µg/Kg-dry	100	7/12/2004
Chlorobenzene	ND	42		µg/Kg-dry	100	7/12/2004
Chloroethane	ND	160		µg/Kg-dry	100	7/12/2004
Chloroform	ND	42		µg/Kg-dry	100	7/12/2004
Chloromethane	ND	160		µg/Kg-dry	100	7/12/2004
cis-1,2-Dichloroethene	ND	42		µg/Kg-dry	100	7/12/2004
cis-1,3-Dichloropropene	ND	42		µg/Kg-dry	100	7/12/2004
Dibromochloromethane	ND	63		µg/Kg-dry	100	7/12/2004
Ethylbenzene	ND	42		µg/Kg-dry	100	7/12/2004
m,p-Xylene	ND	63		µg/Kg-dry	100	7/12/2004
Methylene chloride	ND	210		µg/Kg-dry	100	7/12/2004
o-Xylene	ND	42		µg/Kg-dry	100	7/12/2004
Styrene	ND	42		µg/Kg-dry	100	7/12/2004
Tetrachloroethene	ND	42		µg/Kg-dry	100	7/12/2004
Toluene	ND	42		µg/Kg-dry	100	7/12/2004
trans-1,2-Dichloroethene	ND	42		µg/Kg-dry	100	7/12/2004
trans-1,3-Dichloropropene	ND	42		µg/Kg-dry	100	7/12/2004
Trichloroethene	ND	42		µg/Kg-dry	100	7/12/2004
Vinyl chloride	ND	63		µg/Kg-dry	100	7/12/2004
1,2-Dichloroethene, Total	ND	63		µg/Kg-dry	100	7/12/2004
1,3-Dichloropropene, Total	ND	63		µg/Kg-dry	100	7/12/2004
Xylenes, Total	ND	95		µg/Kg-dry	100	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE

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e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-15 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 2:00:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-17	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.53		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: JJG
Chromium, Trivalent	0.80	0.53		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: **7/14/2004**	Analyst: JJG
Chromium, Hexavalent	4.9	0.51		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: KAE
Percent Moisture	4.9	0.010		% of sample	1	7/12/2004

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- P - Dual Column results percent difference > 40%
- E - Value above quantitation range
- H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-16 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 2:45:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-18	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS		**EPA 8082**			Prep Date: **7/15/2004**	Analyst: **RM**
Aroclor 1016	ND	58		µg/Kg-dry	1	7/17/2004 10:57:00 PM
Aroclor 1221	ND	58		µg/Kg-dry	1	7/17/2004 10:57:00 PM
Aroclor 1232	ND	58		µg/Kg-dry	1	7/17/2004 10:57:00 PM
Aroclor 1242	ND	58		µg/Kg-dry	1	7/17/2004 10:57:00 PM
Aroclor 1248	ND	58		µg/Kg-dry	1	7/17/2004 10 57:00 PM
Aroclor 1254	ND	58		µg/Kg-dry	1	7/17/2004 10:57:00 PM
Aroclor 1260	ND	58		µg/Kg-dry	1	7/17/2004 10:57:00 PM
MERCURY BY CVAA		**EPA 7471**			Prep Date: **7/16/2004**	Analyst: **JDA**
Mercury	0.049	0.010		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			Prep Date: **7/16/2004**	Analyst: **RM**
Aluminum	6,200	230		mg/Kg-dry	500	7/19/2004 5:18:00 PM
Arsenic	3.1	0.045		mg/Kg-dry	1	7/17/2004 6:52:00 PM
Cadmium	0.45	0.023		mg/Kg-dry	1	7/17/2004 6:52:00 PM
Chromium	7.4	0.23		mg/Kg-dry	1	7/17/2004 6:52:00 PM
Copper	26	0.45		mg/Kg-dry	1	7/17/2004 6:52:00 PM
Lead	37	0.45		mg/Kg-dry	1	7/17/2004 6:52:00 PM
Magnesium	3,900	1.4		mg/Kg-dry	1	7/17/2004 6:52:00 PM
Nickel	7.8	0.45		mg/Kg-dry	1	7/17/2004 6:52:00 PM
Silver	ND	0.23		mg/Kg-dry	1	7/17/2004 6:52:00 PM
Zinc	ND	0.45		mg/Kg-dry	1	7/17/2004 6:52:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	82	11		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Acenaphthene	ND	5.5		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Acenaphthylene	ND	16		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Anthracene	51	11		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Benzo(a)anthracene	140	11		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Benzo(a)pyrene	55	11		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Benzo(b-k)fluoranthene	100	22		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Benzo(g,h,i)perylene	34	11		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Chrysene	15	5.5		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Dibenzo(a,h)anthracene	17	11		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Fluoranthene	140	16		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Fluorene	18	11		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Indeno(1,2,3-cd)pyrene	31	11		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Naphthalene	31	16		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Phenanthrene	230	27		µg/Kg-dry	1	7/16/2004 9:34:00 AM
Pyrene	83	16		µg/Kg-dry	1	7/16/2004 9:34:00 AM

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e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-16 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 2:45:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-18	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: DAH
1,1,1-Trichloroethane	ND	48		µg/Kg-dry	115	7/12/2004
1,1,2,2-Tetrachloroethane	ND	72		µg/Kg-dry	115	7/12/2004
1,1,2-Trichloroethane	ND	48		µg/Kg-dry	115	7/12/2004
1,1-Dichloroethane	ND	48		µg/Kg-dry	115	7/12/2004
1,1-Dichloroethene	ND	48		µg/Kg-dry	115	7/12/2004
1,2-Dichloroethane	ND	48		µg/Kg-dry	115	7/12/2004
1,2-Dichloropropane	ND	48		µg/Kg-dry	115	7/12/2004
2-Butanone	ND	180		µg/Kg-dry	115	7/12/2004
2-Hexanone	ND	180		µg/Kg-dry	115	7/12/2004
4-Methyl-2-pentanone	ND	180		µg/Kg-dry	115	7/12/2004
Acetone	ND	540		µg/Kg-dry	115	7/12/2004
Benzene	ND	48		µg/Kg-dry	115	7/12/2004
Bromodichloromethane	ND	72		µg/Kg-dry	115	7/12/2004
Bromoform	ND	72		µg/Kg-dry	115	7/12/2004
Bromomethane	ND	180		µg/Kg-dry	115	7/12/2004
Carbon disulfide	ND	180		µg/Kg-dry	115	7/12/2004
Carbon tetrachloride	ND	48		µg/Kg-dry	115	7/12/2004
Chlorobenzene	ND	48		µg/Kg-dry	115	7/12/2004
Chloroethane	ND	180		µg/Kg-dry	115	7/12/2004
Chloroform	ND	48		µg/Kg-dry	115	7/12/2004
Chloromethane	ND	180		µg/Kg-dry	115	7/12/2004
cis-1,2-Dichloroethene	ND	48		µg/Kg-dry	115	7/12/2004
cis-1,3-Dichloropropene	ND	48		µg/Kg-dry	115	7/12/2004
Dibromochloromethane	ND	72		µg/Kg-dry	115	7/12/2004
Ethylbenzene	ND	48		µg/Kg-dry	115	7/12/2004
m,p-Xylene	ND	72		µg/Kg-dry	115	7/12/2004
Methylene chloride	ND	240		µg/Kg-dry	115	7/12/2004
o-Xylene	ND	48		µg/Kg-dry	115	7/12/2004
Styrene	ND	48		µg/Kg-dry	115	7/12/2004
Tetrachloroethene	ND	48		µg/Kg-dry	115	7/12/2004
Toluene	ND	48		µg/Kg-dry	115	7/12/2004
trans-1,2-Dichloroethene	ND	48		µg/Kg-dry	115	7/12/2004
trans-1,3-Dichloropropene	ND	48		µg/Kg-dry	115	7/12/2004
Trichloroethene	ND	48		µg/Kg-dry	115	7/12/2004
Vinyl chloride	ND	72		µg/Kg-dry	115	7/12/2004
1,2-Dichloroethene, Total	ND	72		µg/Kg-dry	115	7/12/2004
1,3-Dichloropropene, Total	ND	72		µg/Kg-dry	115	7/12/2004
Xylenes, Total	ND	110		µg/Kg-dry	115	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE

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P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-16 (0-1')
Work Order:	0407134	**Collection Date:**	7/8/2004 2:45:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-18	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.52		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: **JJG**
Chromium, Trivalent	6.5	0.52		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: **7/14/2004**	Analyst: **JJG**
Chromium, Hexavalent	0.87	0.52		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: **KAE**
Percent Moisture	4.7	0.010		% of sample	1	7/12/2004

Qualifiers:

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J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-17 (3-4')
Work Order:	0407134	**Collection Date:**	7/8/2004 3:05:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-19	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
PCBS		**EPA 8082**			Prep Date: **7/15/2004**	Analyst: **RM**
Aroclor 1016	ND	66		µg/Kg-dry	1	7/17/2004 11:35:00 PM
Aroclor 1221	ND	66		µg/Kg-dry	1	7/17/2004 11:35:00 PM
Aroclor 1232	ND	66		µg/Kg-dry	1	7/17/2004 11:35:00 PM
Aroclor 1242	ND	66		µg/Kg-dry	1	7/17/2004 11:35:00 PM
Aroclor 1248	ND	66		µg/Kg-dry	1	7/17/2004 11:35:00 PM
Aroclor 1254	ND	66		µg/Kg-dry	1	7/17/2004 11:35:00 PM
Aroclor 1260	ND	66		µg/Kg-dry	1	7/17/2004 11:35:00 PM
MERCURY BY CVAA		**EPA 7471**			Prep Date: **7/16/2004**	Analyst: **JDA**
Mercury	0.025	0.0068		mg/Kg-dry	1	7/16/2004
METALS ANALYSIS BY ICP-MS		**EPA 6020A**			Prep Date: **7/16/2004**	Analyst: **RM**
Aluminum	5,200	230		mg/Kg-dry	500	7/19/2004 5:22:00 PM
Arsenic	3 3	0.047		mg/Kg-dry	1	7/17/2004 6:57:00 PM
Cadmium	0 53	0.023		mg/Kg-dry	1	7/17/2004 6:57:00 PM
Chromium	26	0.23		mg/Kg-dry	1	7/17/2004 6:57:00 PM
Copper	18	0.47		mg/Kg-dry	1	7/17/2004 6:57:00 PM
Lead	100	4.7		mg/Kg-dry	10	7/18/2004 8:26:00 PM
Magnesium	5,700	14		mg/Kg-dry	10	7/18/2004 8:26:00 PM
Nickel	9 8	0.47		mg/Kg-dry	1	7/17/2004 6:57:00 PM
Silver	0.45	0.23		mg/Kg-dry	1	7/17/2004 6:57:00 PM
Zinc	ND	0.47		mg/Kg-dry	1	7/17/2004 6:57:00 PM
POLYNUCLEAR AROMATIC HYDROCARBONS (PAHS) - SIM		**EPA 8270M**			Prep Date: **7/14/2004**	Analyst: **DAH**
2-Methylnaphthalene	110	11		µg/Kg-dry	1	7/16/2004 1:59:00 PM
Acenaphthene	27	5.4		µg/Kg-dry	1	7/16/2004 1:59:00 PM
Acenaphthylene	40	16		µg/Kg-dry	1	7/16/2004 1:59:00 PM
Anthracene	140	11		µg/Kg-dry	1	7/16/2004 1:59:00 PM
Benzo(a)anthracene	310	11		µg/Kg-dry	1	7/16/2004 1:59:00 PM
Benzo(a)pyrene	230	54		µg/Kg-dry	5	7/21/2004 3:06:00 AM
Benzo(b-k)fluoranthene	500	110		µg/Kg-dry	5	7/21/2004 3:06:00 AM
Benzo(g,h,i)perylene	130	54		µg/Kg-dry	5	7/21/2004 3:06:00 AM
Chrysene	250	5.4		µg/Kg-dry	1	7/16/2004 1:59:00 PM
Dibenzo(a,h)anthracene	65	54		µg/Kg-dry	5	7/21/2004 3:06:00 AM
Fluoranthene	390	16		µg/Kg-dry	1	7/16/2004 1:59:00 PM
Fluorene	33	11		µg/Kg-dry	1	7/16/2004 1:59:00 PM
Indeno(1,2,3-cd)pyrene	150	54		µg/Kg-dry	5	7/21/2004 3:06:00 AM
Naphthalene	120	16		µg/Kg-dry	1	7/16/2004 1:59:00 PM
Phenanthrene	500	140		µg/Kg-dry	5	7/21/2004 3:06:00 AM
Pyrene	390	81		µg/Kg-dry	5	7/21/2004 3:06:00 AM

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S - Spike Recovery outside accepted recovery limits
P - Dual Column results percent difference > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-17 (3-4')
Work Order:	0407134	**Collection Date:**	7/8/2004 3:05:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-19	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: DAH
1,1,1-Trichloroethane	ND	44		µg/Kg-dry	104	7/12/2004
1,1,2,2-Tetrachloroethane	ND	66		µg/Kg-dry	104	7/12/2004
1,1,2-Trichloroethane	ND	44		µg/Kg-dry	104	7/12/2004
1,1-Dichloroethane	ND	44		µg/Kg-dry	104	7/12/2004
1,1-Dichloroethene	ND	44		µg/Kg-dry	104	7/12/2004
1,2-Dichloroethane	ND	44		µg/Kg-dry	104	7/12/2004
1,2-Dichloropropane	ND	44		µg/Kg-dry	104	7/12/2004
2-Butanone	ND	160		µg/Kg-dry	104	7/12/2004
2-Hexanone	ND	160		µg/Kg-dry	104	7/12/2004
4-Methyl-2-pentanone	ND	160		µg/Kg-dry	104	7/12/2004
Acetone	ND	490		µg/Kg-dry	104	7/12/2004
Benzene	ND	44		µg/Kg-dry	104	7/12/2004
Bromodichloromethane	ND	66		µg/Kg-dry	104	7/12/2004
Bromoform	ND	66		µg/Kg-dry	104	7/12/2004
Bromomethane	ND	160		µg/Kg-dry	104	7/12/2004
Carbon disulfide	ND	160		µg/Kg-dry	104	7/12/2004
Carbon tetrachloride	ND	44		µg/Kg-dry	104	7/12/2004
Chlorobenzene	ND	44		µg/Kg-dry	104	7/12/2004
Chloroethane	ND	160		µg/Kg-dry	104	7/12/2004
Chloroform	ND	44		µg/Kg-dry	104	7/12/2004
Chloromethane	ND	160		µg/Kg-dry	104	7/12/2004
cis-1,2-Dichloroethene	ND	44		µg/Kg-dry	104	7/12/2004
cis-1,3-Dichloropropene	ND	44		µg/Kg-dry	104	7/12/2004
Dibromochloromethane	ND	66		µg/Kg-dry	104	7/12/2004
Ethylbenzene	ND	44		µg/Kg-dry	104	7/12/2004
m,p-Xylene	ND	66		µg/Kg-dry	104	7/12/2004
Methylene chloride	ND	220		µg/Kg-dry	104	7/12/2004
o-Xylene	ND	44		µg/Kg-dry	104	7/12/2004
Styrene	ND	44		µg/Kg-dry	104	7/12/2004
Tetrachloroethene	ND	44		µg/Kg-dry	104	7/12/2004
Toluene	58	44		µg/Kg-dry	104	7/12/2004
trans-1,2-Dichloroethene	ND	44		µg/Kg-dry	104	7/12/2004
trans-1,3-Dichloropropene	ND	44		µg/Kg-dry	104	7/12/2004
Trichloroethene	310	44		µg/Kg-dry	104	7/12/2004
Vinyl chloride	ND	66		µg/Kg-dry	104	7/12/2004
1,2-Dichloroethene, Total	ND	66		µg/Kg-dry	104	7/12/2004
1,3-Dichloropropene, Total	ND	66		µg/Kg-dry	104	7/12/2004
Xylenes, Total	ND	98		µg/Kg-dry	104	7/12/2004
CYANIDE, TOTAL		**EPA 9014**				Analyst: KAE

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E - Value above quantitation range
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e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	SB-17 (3-4')
Work Order:	0407134	**Collection Date:**	7/8/2004 3:05:00 PM
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-19	**Matrix:**	SOIL

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
Cyanide, Total	ND	0.53		mg/Kg-dry	1	7/16/2004
CHROMIUM, TRIVALENT		**CALCULATION**				Analyst: JJG
Chromium, Trivalent	24	0.53		mg/Kg-dry	1	7/19/2004
CHROMIUM, HEXAVALENT		**EPA 7196A**			Prep Date: **7/14/2004**	Analyst: JJG
Chromium, Hexavalent	1.9	0.51		mg/Kg-dry	1	7/16/2004
PERCENT MOISTURE		**EPA 160.3**				Analyst: KAE
Percent Moisture	4.9	0.010		% of sample	1	7/12/2004

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- P - Dual Column results percent difference > 40%
- E - Value above quantitation range
- H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

Date: *July 21, 2004*

CLIENT:	ERM, Inc	**Client Sample ID:**	Trip Blank
Work Order:	0407134	**Collection Date:**	7/7/2004
Project:	Patrick Paint / Sturgis Iron & Metal		
Lab ID:	0407134-20	**Matrix:**	TRIP BLANK

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
TARGET COMPOUND LIST (TCL) - VOC		**EPA 8260**				Analyst: **BAT**
1,1,1-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
1,1,2,2-Tetrachloroethane	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
1,1,2-Trichloroethane	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
1,1-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
1,1-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
1,2-Dichloroethane	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
1,2-Dichloropropane	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
2-Butanone	ND	5.0		µg/L	1	7/13/2004 3:44:00 AM
2-Hexanone	ND	5.0		µg/L	1	7/13/2004 3:44:00 AM
4-Methyl-2-pentanone	ND	5.0		µg/L	1	7/13/2004 3:44:00 AM
Acetone	ND	20		µg/L	1	7/13/2004 3:44:00 AM
Benzene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Bromodichloromethane	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Bromoform	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Bromomethane	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Carbon disulfide	ND	2.5		µg/L	1	7/13/2004 3:44:00 AM
Carbon tetrachloride	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Chlorobenzene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Chloroethane	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Chloroform	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Chloromethane	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
cis-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
cis-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Dibromochloromethane	ND	1.0		µg/L	1	7/13/2004 3:44.00 AM
Ethylbenzene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
m,p-Xylene	ND	2.0		µg/L	1	7/13/2004 3:44:00 AM
Methylene chloride	ND	5.0		µg/L	1	7/13/2004 3:44:00 AM
o-Xylene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Styrene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Tetrachloroethene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Toluene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
trans-1,2-Dichloroethene	ND	1.0		µg/L	1	7/13/2004 3:44 00 AM
trans-1,3-Dichloropropene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Trichloroethene	ND	1.0		µg/L	1	7/13/2004 3:44:00 AM
Vinyl chloride	ND	1.0		µg/L	1	7/13/2004 3:44.00 AM
1,2-Dichloroethene, Total	ND	2.0		µg/L	1	7/13/2004 3.44.00 AM
1,3-Dichloropropene, Total	ND	2.0		µg/L	1	7/13/2004 3.44:00 AM
Xylenes, Total	ND	3.0		µg/L	1	7/13/2004 3:44:00 AM

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Phase I and II Environmental Site Assessment

Dresser, Dresser, Haas & Caywood, P C.

ANEWCO
1631 Oakland Avenue
Elkhart, Indiana

24 March 2005

www.erm.com

FINAL REPORT

Dresser, Dresser, Haas & Caywood, P.C.

Phase I and II Environmental Site Assessment
ANEWCO
1631 Oakland Avenue
Elkhart, Indiana

24 March 2005

Project No. 0027887

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EXECUTIVE SUMMARY

Environmental Resources Management (ERM) completed a Phase I and II Environmental Assessment of the ANEWCO facility located at 1631 Oakland Avenue in Elkhart, Indiana (the "Site" and "subject property"). The subject property consists of an approximately 4.79-acre parcel that is developed with a 39,520 square foot main (north) building and a 10,782 square foot secondary (south) building.

The subject property is a glass and mirror processing facility that was reported to have started around 1992. Prior to 1992, the property was used by Draggoo Group, Inc. and Draggoo Electric Company as an electrical services business starting in early 1980s. Prior to the early 1980s the Site was used by Elkhart Rubber Works since at least 1910. Current operations at the subject property include the cutting, doubling, beveling, de-grooving, V-grooving, placement of white backing to create decorative designs on glass and mirrors. Chemical materials required for the operations included cerium oxide, PNT-88 (lacquer/thinner), MERIT (a cleaning soap), and small quart-size containers of motor oil and grease. Waste materials from these operations include glass and mirror scraps, pretreated wash water, and dried wash water (settled) solids.

ERM reviewed a 28 July 1993 *The 1629 Corporation Environmental Testing Project* report prepared by Wightman Petrie Environmental, Inc., and a 17 August 1992, *Phase II Environmental Property Assessment* report prepared by Bruce Carter & Associates. The *1629 Corporation Environmental Testing Project* report revealed that a monitoring well was installed south of the manufacturing building in an area where chemical mixing was believed to have occurred while the property was occupied by Elkhart Rubber. Analysis of the soil and groundwater samples revealed concentrations of tetrachloroethene and 1,1,1-trichloroethane below cleanup standards. The *Phase II Environmental Property Assessment* report revealed that six (6) soil borings were conducted around the monitoring well and analysis of soil samples from these borings revealed low level contaminant concentrations. The detected concentrations do not exceed current Indiana Department of Environmental Management (IDEM) generic residential cleanup criteria.

Based on the information and data obtained during this investigation, ERM's assessment has revealed evidence of recognized environmental conditions (RECs), as defined by ASTM Practice E 1527, in connection with the subject property, except as described below. A REC is defined as "the presence or likely presence of *hazardous substances* or *petroleum products* on a *property* under conditions that indicate an existing release, a past release, or a material threat of a release of *hazardous substances* or *petroleum products*

into structures on the *property* or into the ground, groundwater, or surface water of the *property*, excluding *de minimis* conditions that generally do not present a material risk of harm to public health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies." ERM's assessment has revealed no evidence of RECs in connection with the subject property, with the exception of the following:

- Review of a 1917 Sanborn map revealed a 270-gallon gasoline tank located along the south wall of the Elkhart Rubber Works building. Potential leaks/spills associated with the gasoline tank represents a REC to the Site;

- Review of the 1917, 1927, 1950 and1968 Sanborn maps revealed a "vulcanization" tank used in the rubber treatment process located along the southern wall of the Elkhart Rubber Works building. Substances associated with the vulcanization tank operation represent a REC to the Site if releases occurred;

- Review of the 1950 and 1968 Sanborn maps revealed a machine shop that was located south of the office area. Contaminants associated with the machine shop operations represents a REC to the Site;

- Review of the 1950 and 1968 Sanborn maps revealed a "dip" tank that was located in the northwest corner of the southern building. Contaminants associated with the dip tank operation represent a REC to the Site;

- Review of the 1917, 1927 and 1950 Sanborn maps revealed an "oil house" south of the Elkhart Rubber Works Building. Contaminants associated with the oil house operation represent a REC to the Site; and

- Review of the EDR database reported revealed that the subject property is located on the northeastern corner of the Conrail Rail Yard National Priority List (NPL) site boundary. The 765-acre NPL site has been impacted by releases of carbon tetrachloride, oil, diesel fuel, hydrochloric acid, caustic soda, and degreasers. Although specific locations of contamination have not been assessed, past releases at the NPL site represents a REC to the Site.

- The Elkhart County Health Department - Environmental Health Division (ECHD-EHD) had files on a nearby leaking underground storage tank (LUST) site located at the corner of Wolf Avenue and 13th Street (south and potentially upgradient of the subject property). A release occurred at the site in 1990, and presents a REC to the subject property.

The following are ERM's conclusions and recommendations based on the Phase II investigation of the RECs:

- Soil – IDEM cleanup criteria exceedances for arsenic, lead, and/or SVOCs were detected in GP-3 (1 - 4'), GP-7 (0 - 3'), GP-10 (0 - 3'), GP-11 (0 - 3'), GP-13 (1 - 2'), and GP-14 (0.5 - 1.5'). The source of the impact appears to be from releases associated with a gasoline tank and other historical operations.

  Arsenic was detected in six (6) samples (GP-3, GP-7, GP-10, GP-11, GP-13 and GP-14) exceeding residential contact criteria, none exceeded industrial cleanup criteria. Based on the planned industrial use of the property, no further testing is recommended.

  Lead was detected in one (1) sample (GP-10) at a concentration exceeding both the residential and industrial contact criteria. This sample was collected near the former gasoline tank and the elevated lead concentrations may be associated with leaded gasoline. Additional investigation is recommended to determine the extent of soil impacted above industrial cleanup criteria and to estimate the cost for remediation.

  Several SVOCs were detected above residential and industrial cleanup criteria at GP-7, which was conducted adjacent to the former vulcanization tank. Five (5) SVOCs parameters exceeded industrial criteria. Black fill material was noted in this sample, but otherwise no obvious evidence of contamination. Analysis of soil samples collected from nearby borings GP-7, GP-8, and GP-11 did not indicate elevated concentrations of lead; therefore, this is likely to be an isolated condition. Additional investigation is recommended to determine the extent of soil impacted above industrial cleanup criteria and to estimate the cost for remediation.

- Groundwater – No exceedences of IDEM cleanup criteria were identified. No further investigation of groundwater is recommended.

- Asbestos – Five (5) homogeneous materials were identified as asbestos-containing materials (ACMs) or presumed asbestos-containing materials (PACMs). It is recommended that prior to any renovation or demolition activities conducted at the subject property, these materials should be properly removed and managed by a certified asbestos abatement contractor and proper notifications should be submitted to the appropriate government agencies.

1.0 INTRODUCTION AND BACKGROUND

1.1 PURPOSE AND AUDITORS

Environmental Resources Management (ERM) performed a Phase I and II Environmental Site Assessment (ESA) of ANEWCO ("ANEWCO"), located at 1631 Oakland Avenue, Elkhart, Indiana (the "Site" or the "subject property"). The environmental assessment was performed for Dresser, Dresser, Haas & Caywood, P.C., and Sturgis Iron and Metal Company in anticipation of a possible sale of the subject property.

The Phase I Site visit was conducted on 2 and 11 February 2005 by ERM assessor Dan Rusiecki. Mr. Rick Hollar, President of ANEWCO, was interviewed on 2 February 2005 for information regarding recent and historic operations at the Site. The Phase II investigation and an asbestos assessment were conducted on 23, 24 and 25 February 2005 by ERM assessors Dan Rusiecki and Paul Sterkenburg.

1.2 SCOPE OF WORK

This environmental assessment was conducted in accordance with ERM's proposals dated 31 January 2005, and 26 February 2005, and in general conformance with the requirements of ASTM Standard E1527-00 (Phase I only); *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.*

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 and II ESA 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 review of fire insurance maps city directories;
- observation of adjacent properties and the local area to evaluate the potential for adverse environmental impact to the subject property;
- contracting of Environmental Data Resources (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;

- a preliminary building asbestos assessment included visible observations of readily accessible building areas, sample collection and analysis for asbestos;

- conducting seventeen (17) soil borings for collection of soil and groundwater samples; and

- submittal of samples for laboratory analysis of parameters potentially associated with historical operations.

Photographs of the Site and surrounding areas were taken to document current conditions and are included in Appendix A.

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*

Limiting conditions were encountered during the Site visit consisted of snow on the ground that limited a visual inspection of the ground for staining and distressed vegetation. In addition, a small building at the Site, which was reported as being vacant, could not be accessed due to a jammed door. The weather during the Site visit on 2 February 2005 was

partly cloudy and the temperature approximately 30°F. The Site visit on 11 February 2005 was cloudy and the temperature approximately 30°F.

2.0 SITE SETTING

2.1 LOCATION

The Site is located at 1631 Oakland Avenue, within the city limits of Elkhart, Indiana. The Site is developed with a manufacturing and office building occupying approximately 39,520 square feet on the northern portion of the Site, and a storage building occupying approximately 10,782 square feet located on the southern portion of the Site. The total Site encompasses approximately five (5) acres. The general location of the property and the physiographic features of the surrounding area are shown on Figure 1, developed from the United States Geological Survey (USGS) 7.5-minute topographic map for the Elkhart, Indiana quadrangle (dated 1994).

Tax assessor records and a legal description of the Site, as provided by the Elkhart County Board of Realtors, is included in Appendix B.

2.2 NEIGHBORING PROPERTIES

The Site is located in a commercial area. Adjacent properties include:

- North: Railroad tracks and a residence.
- East: Oakland Avenue and residences.
- South: Residences and West Wolf Avenue.
- West: Elkhart Metals.

ERM did not observe visual evidence of potential environmental concerns at the adjacent properties.

2.3 TOPOGRAPHY AND HYDROLOGY

The Site is located at an elevation of approximately 750 feet above mean sea level (msl), with a ground surface that that is relatively flat with the surrounding area. The overall area slopes gently to the north-northwest. The nearest major surface water body is the St. Joseph River, which is located approximately 1,700 feet to the northwest.

Storm water runoff at the Site infiltrates into the ground or is directed to the municipal storm water sewer along Oakland Avenue.

No suspected wetland areas were noted on the property during ERM's Site visit. EDR's review of the National Wetlands Inventory and Federal Emergency Management Agency's floodplain maps for the area did not identify coverage for the Site.

2.4 *GEOLOGY AND HYDROGEOLOGY*

Limited site-specific geologic and hydrogeologic information was available to ERM from a 28 July 1993 *The 1629 Corporation Environmental Testing Project* report prepared by Wightman Petrie Environmental, Inc. Based on the report, the soils at the Site consists of a coarse sand and fine gravel to approximately 9 feet below grade, which is underlain by a coarse sand. Saturated coarse sand was at depth of approximate 17 feet below grade. The depth to groundwater is approximately 16 feet below grade.

Groundwater flow direction can be influenced locally and regionally by the presence of local wetland features, surface topography, recharge and discharge areas, horizontal and vertical inconsistencies in the types and location of subsurface soils, and proximity to water pumping wells. No water supply wells were identified in the EDR report within ¼ mile of the subject property.

3.0 SITE AND OPERATIONS INFORMATION

3.1 GENERAL SITE DESCRIPTION

A Site map is provided as Figure 2 and the enlargement of the building is provided on Figure 3. The subject property consists of an approximately 4.79-acre parcel that is developed with a 39,520 square foot main (north) building and a 10,782 square foot secondary (south) building. The two buildings were constructed approximately 75 years ago (1929 or earlier). A parking area (bare ground and gravel) is located to the east of the main building with access drives to the east off Oakland Avenue. A parking area (asphalt paved) is located west of the secondary (south) building with an access drive to the north off West Wolf Avenue.

The subject property is currently used for glass and mirror processing. Current and former operations at the Site are discussed in Section 3.3.

The main (north) building contains the glass and mirror processing operations and an office, and the secondary (south) building is used for storage. The building materials in the office area include vinyl tile floors, wood paneled walls, dropped acoustical ceiling tiles, and block/brick walls. The glass and mirror processing areas of the main and secondary buildings have concrete block walls, concrete floors, and wood ceilings.

3.2 UTILITIES

The Site is provided with the following utilities:

- Water provided by the City of Elkhart;
- Sanitary sewer provided by the City of Elkhart;
- Electricity from the AEP; and
- Natural gas by NIPSCO.

The building is heated with natural gas-fired space heaters.

3.3 PROCESSES AND MATERIAL USE

3.3.1 *Current Operations*

The Site is a glass and mirror processing facility that was reported was started around 1992. Operations at the subject property include the cutting,

doubling, beveling, de-grooving, V-grooving, placement of white backing, and creating decorative designs on glass and mirror orders.

3.3.2 *Discontinued Operations*

According to Mr. Hollar, the Site has been used as a glass and mirror processing facility since approximately 1992 (see Section 4.0 for further discussion of the Site history). Mr. Hollar reported that the process that places the decorative designs on glass and mirrors have been reduced in the past couple of years. The designs are created by placing lacquer on the glass or mirror and sending the material through ovens thereby creating a design on the material. Mr. Hollar reported that only one of four ovens is currently used in the operations. Mr. Hollar reported that prior to 1992, the property was used by Draggoo Group, Inc. and Draggoo Electric Company as an electrical services business that started in early the early 1980s. Prior to the early 1980s the Site was used by Elkhart Rubber Works until at least 1959. Mr. Hollar was not aware of the use of the property prior to 1959, and was not aware of the operations Elkhart Rubber Works conducted at the Site.

3.4 *CHEMICAL USE AND STORAGE*

Current chemical storage at the Site (at the time of the walkover) included three (3) 5-gallon containers of tar, an open 5-gallon container of oil, one (1) 55-gallon drum of Nitric Acid, nineteen (19) 5-gallon containers of ink, one (1) 55-gallon drum of soap, five (5) 55-gallon drums of PNT-88 (lacquer/thinner), one (1) 55-gallon drum of MERIT (a lacquer/thinner), two (2) 55-gallon drums of dry cerium oxide, four (4) 200-gallon tots of settling water, one (1) 55-gallon drum of cyclohexanone (a lacquer/thinner), twenty plus 1-gallon containers of ink, a 5-gallon container of cangol (ink), six (6) 5-gallon container of crystalustre compound (ink), a 55-gallon drum of screen wash (soap), and approximately ten (10) 1-gallon containers of paint. Mr. Hollar reported that all these materials will be removed from the Site, when his business moves to another location.

Five (5) propane tanks were used for the fork lift.

Hazardous and non-hazardous wastes were reportedly generated in minor quantities, as discussed further in Section 3.5.

3.4.1 *Container Storage*

As indicated above, chemical materials were formerly stored in 55-gallon drums and smaller containers in the former boiler house, dumpster area, east storage area, glass processing area, and the furnace/glass storage area of the main (north) building. These areas have concrete floors that appeared to be in fair condition with some cracking.

3.4.2 *Underground Storage Tanks (USTs)*

Mr. Hollar reported that no underground storage tanks (USTs) were present at the Site. ERM did not observe any evidence of USTs at the Site.

3.4.3 *Aboveground Tanks (ASTs)*

ERM observed a four (4) 200-gallon totes or aboveground storage tanks (ASTs) inside the glass processing area. The ASTs contained wash water (with the cerium oxide) and were used as settling tanks. The ASTs appeared to be in good condition. No staining of the floors around the ASTs was noted.

3.5 *HAZARDOUS AND NON-HAZARDOUS WASTE MANAGEMENT*

3.5.1 *Hazardous Waste*

No hazardous waste management activities were observed at the Site during the Site walkover. Mr. Hollar was not aware of any prior generation of hazardous wastes.

3.5.2 *Non-Hazardous Waste*

According to Mr. Hollar, non-hazardous wastes generated included paper and cardboard. The general refuse is removed by BFI and disposed of at Elkhart County Landfill.

Mr. Hollar reported that sediment from the settling tanks were removed by BFI and disposed of at Elkhart County Landfill. The wash water from the glass and mirror processing were contained in the ASTs and allowed to settle for approximately six (6) months. The water from the ASTs is discharged through the City of Elkhart sanitary sewer system and the settlement material was placed in an open 200-gallon container and allowed to dry. The dried material was then placed in a dumpster and removed by BFI for disposal.

3.6 *WATER, WASTEWATER AND STORM WATER*

3.6.1 *Water*

According to Mr. Hollar, the Site and surrounding areas uses municipal water from the City of Elkhart.

3.6.2 *Wastewater*

The facility generates sanitary waste that is discharged to the City of Elkhart. The facility generated wash water from the glass and mirror processing that is discharged to the City of Elkhart sanitary sewer system. Mr. Hollar reported that the City of Elkhart has monitored the discharge from Site but has stopped the monitoring two (2) years ago. Mr. Hollar indicated that the Site has not received any notices of violation from the City of Elkhart from the discharge monitoring.

ERM observed two (2) floor drains in the main (north) building and a floor drain in the secondary (south) building. Mr. Hollar reported that the floor drains are connected the City of Elkhart sanitary sewer system. No staining or unusual odors were noted in or around the floor drains.

3.6.3 *Storm Water*

Storm water from roof drains flows to the ground. Storm water runoff from the parking areas and the remaining areas of the Site infiltrates into the ground or flows into storm water sewer system along Oakland Avenue.

According to Mr. Hollar, the Site has not prepared a Storm Water Pollution Prevention Plan (SWP3) or a Notification of Intent (NOI) to participate in the Indiana general permit program.

3.7 *AIR EMISSIONS*

According to Mr. Hollar, the Site does generate some air emissions from ovens that are used as a silt screen processes that in-print decorative design onto the glass or mirror products. Mr. Hollar reported that the Site has four (4) ovens but only one (1) oven is used, because of the Site could not cost-effectively operate the four ovens. No air permits were obtained or are required for this operation.

Mr. Hollar reported that approximately four (4) years ago, the Indiana Occupational Safety and Health Administration (OSHA) conducted air

monitoring at the Site because of an anomalous complaint. The air monitoring revealed that the air at the Site was clean and that the Site did not violate any Indiana air emissions or permitting requirements. Mr. Hollar reported that OSHA did not send him any documents concerning the monitoring findings.

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. According to Mr. Hollar, the Site did not have any transformers, capacitors or any equipment that contained PCBs. Inspection of the main (north) building revealed three (3) dry-type non-PCB transformers. No staining was noted on the floor around the transformers.

Inspection of the secondary (south) buildings revealed electrical equipment consisting of capacitors, fuses and fuse boxes, wiring, and small dry-type non-PCB transformers.

3.9 *LEAD-CONTAINING MATERIALS*

In 1978 the Lead-Based Paint Poison Prevention Act (LBPPPA) banned the sale and use of lead-based paint. The buildings at the Site were constructed prior to 1978 and the paints used in the buildings may likely contained lead-based paint (LBP). However, the interior and exterior surfaces of the main (north) and secondary (south) buildings were not painted. The interior walls of the office area were painted and may contain LBPs. The paint on the walls was intact with no signs of chipping, pealing or deterioration.

3.10 *VISUAL INDICATIONS OF ON-SITE CONTAMINATION*

Inspection of the Site grounds was limited by snow cover. ERM did not observe any ASTs or UST piping systems at the Site.

3.11 *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).

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.

ERM conducted visual observations for suspect asbestos-containing materials in easily accessible areas. Building materials that could be considered "suspect ACM" include brick insulation in the Old Boiler House, vinyl floor tile and suspended acoustical ceiling tile in the Office Area. The suspect ACMs appeared to be in good physical condition and should not pose a health hazard. Should any ACM which is present become damaged and friable, or disturbed during restoration or construction activities, this could result in release of airborne asbestos and pose potential exposure hazards. This would require abatement or long-term management. An assessment of the suspected ACMs is discussed in Section 7.0.

3.12 ENVIRONMENTAL NOISE

Mr. Hollar reported that there have not been any noise complaints relating to Site activities.

4.0 ASSESSMENT OF PAST LAND USE AND OPERATIONS

4.1 GENERAL INFORMATION

Based on Site records and interview with Mr. Hollar, a glass and mirror processing operation has began at the Site around 1992 when the property was purchased. The main (north) and secondary (south) buildings were reportedly constructed at least 75 plus years ago (around 1929). Operations at the subject property include the cutting, doubling, beveling, de-grooving, V-grooving, placement of white backing, and creative decorative designs on glass and mirror orders. Mr. Hollar reported that prior to 1992, the property was used by Draggoo Group, Inc. and Draggoo Electric Company as an electrical services business that starting in early the early 1980s. Prior to the early 1980s the Site was used by Elkhart Rubber Works until at least 1959. Mr. Hollar was not aware of the use of the property prior to 1959, and was not aware of the operations Elkhart Rubber Works conducted at the Site.

4.2 PREVIOUS ENVIRONMENTAL REPORTS

Previous environmental reports related to the Site that were reviewed by ERM include:

- A 28 July 1993 *The 1629 Corporation Environmental Testing Project* report prepared by Wightman Petrie Environmental, Inc.; and
- A 17 August 1992, *Phase II Environmental Property Assessment* report prepared by Bruce Carter & Associates.

The *1629 Corporation Environmental Testing Project* report revealed that a monitoring well was installed south of the manufacturing building in a area where chemical mixing was believed to have occurred while the property was occupied by Elkhart Rubber. Analysis of the soil and groundwater samples revealed concentrations of tetrachloroethene and 1,1,1-trichloroethane below drinking water standards.

The *Phase II Environmental Property Assessment* report revealed that six (6) soil borings were conducted around the monitoring well and analysis of soils samples from these borings did not reveal any concentrations of surface contamination exceeding the Indiana Department of Environmental Management (IDEM) residential drinking water cleanup criteria.

4.3 EVALUATION OF HISTORIC INFORMATION SOURCES

To determine past uses of the subject property and surrounding properties, ERM reviewed historical sources of information, as available. Historical aerial photography, topographic maps, Sanborn maps, and city directory review findings were provided by EDR. In additions, aerial photographs were provided by National Medial Consultants BBL (BBL), and Kosciusko County. Copies of these documents are presented in Appendix C.

Summary of Historical Records Reviewed

	Years Reviewed	
Source of Information	Subject Property	Adjacent Properties
Interviews	Rick Hollar	Rick Hollar
Sanborn Fire Insurance Company Maps	1910, 1917, 1927, 1950 and 1968	1910, 1917, 1927, 1950 and 1968
USGS Topographic Maps	1961, 1981 and 1994	1961, 1981 and 1994
Local Tax Records	All Available	Not Reviewed
City Directories	1945 - 2003	1945 - 2003
Aerial Photographs - EDR	1957, 1965, 1973, 1987 and 1992	1957, 1965, 1973, 1987 and 1992
Aerial Photographs - Elkhart County Archives and Microfilm Department	1977 and 1986	1977 and 1986
Aerial Photograph - TerraServer USGS	1999	1999
50-year Chain-of-Title	Not Reviewed	Not Reviewed

4.3.1 *Subject Property*

Based on the historical records described above, observations pertaining to the subject property include the following:

- The earliest historical record source for the Site is the 1910 Sanborn Fire Insurance Company Map. No other reasonably obtainable record sources are known to be available to document the Site history prior to 1910. The 1910 Sanborn map denotes Site as being developed with a building that was occupied by Elkhart Rubber Works, and a residential-type structure in the eastern section of the subject property.

- The next available record source (1917 Sanborn map) shows an addition to the northwest section of the Site building, a 270-gallon gasoline tank, a vulcanizing tank, an oil house and an insulation boiler located south of the building. The gasoline tank, vulcanizing tank and oil house may potentially contain hazardous substances and, therefore, present a recognized environmental condition (REC) to the subject property.

- The 1927 Sanborn map shows an addition to the northern half of the building and the removal of the 270 gallon gasoline tank.

- The 1950 Sanborn map shows additions to the Site, which included the following: an addition was constructed to the middle northern section of the main building; an additional office area was constructed along the east side of the main building; a machine shop building south of the eastern office was constructed; a miscellaneous building, an oil house and a box shooks building were constructed south of the main building; and a Plant #2 building consisting of a raw stock and gasket plant areas were constructed and located south of the main building. The map shows a laboratory area in the eastern section of the main building and a dip tank in the northwestern corner of Plant #2. The oil house, laboratory and dip tank potentially contained hazardous materials and, therefore, may present a REC to the subject property. In addition, the machine shop building potentially conducted operations that may have used or produced wastes consisting of solvents or petroleum products, and therefore, the machine shop presents a REC to the subject property.

- The 1957 aerial photograph depicts the Site as being developed. Due to limited resolution, Site features are not discernable.

- The 1961 topographic map depicts the main building on the Site.

- The 1965 aerial photograph depicts the Site as being developed. Due to limited resolution, Site features are not discernable.

- The 1968 Sanborn map does not show any significant changes to the Site since the 1950 Sanborn map, with the exception of the removal of the residential-type structure from the eastern section of the subject property.

- The 1973 and 1977 aerial photographs depict the Site as being developed. Due to limited resolution, Site features are not discernable.

- The 1981 topographic map is a revised 1961 topographic map that shows the addition of Plant #2 to the Site, as noted in the 1950 Sanborn map.

- The 1986 aerial photograph depicts the Site as being developed. Due to limited resolution, Site features are not discernable.

- The City Directory dated 1988 denotes the Site as being occupied by Draggoo Electric Company.

- The 1992 aerial photograph depicts the Site as being developed. Due to limited resolution, Site features are not discernable.

- The City Directory dated 1993 denotes the Site as being occupied by Draggoo Group, Inc.

- The 1994 topographic map is a revised 1961 topographic map that does not show any significant changes to the Site, since the 1981 topographic map.

- The City Directory dated 1998 denotes the Site as being occupied by Anew Company.

- The 1999 aerial photograph depicts the Site as being developed. Due to limited resolution, Site features are not discernable. However, the content in the aerial appears to be consistent with what was observed during the walkover.

- The City Directory dated 2003 denotes the Site as being occupied by Anew co.

Review of the historical documents from the Sanborn Fire Insurance Maps, USGS Topographic Maps, City Directories, and aerial photographs revealed the following issues that present a REC to the subject property:

- The 1917 Sanborn map shows the presence of a 270-gallon gasoline tank, a vulcanizing tank and an oil house south of the main building.

- The 1950 Sanborn map shows the presence of a machine shop building south of an eastern office addition, an oil house south of the main building, a laboratory area in the eastern section of the main building, and a dip tank in the northwestern corner of Plant #2.

ERM obtained a copy of current tax records for the Site from the Elkhart County Board of Realtors. These records indicate the Site is zoned Business/commercial/industrial, has two (2) buildings that are used for manufacturing-distribution, and the owned of the Site was not noted on the records. The records that the main building has a size of approximately 39,520 square feet and the south secondary building has a size of approximately 10,782 square feet. The main building was constructed around 1929 and covers an approximately 4.79-acre parcel. The Site occupies nine (9) parcels and the parcel numbers are present in the legal description provided Appendix B.

4.3.2 *Adjacent Properties and Surrounding Area*

Based on the historical records described above, past uses of adjacent properties and the surrounding area include the following:

- The 1910 Sanborn map does not depicts any adjacent properties.
- The 1917 Sanborn map depicts residential-type structures to the east and Sidway Mercantile Company to the west. The north and south adjacent properties are not depicted on the map.
- The 1927 Sanborn map depicts residential-type structures to the east, Pancost Milling Company (flour mill) and residential-type structures to the south, The Godfrey Conveyer Company, Inc. to the west, and NYCRR railroad tracks to the north.
- The 1950 Sanborn map depicts a Plywood & Sash & Door business to the south, and the remaining adjacent properties to the west, north and east remain the same as noted in the 1927 Sanborn map.
- The 1968 Sanborn map does not depict any significant changes of the adjacent properties.
- The 1957 through 1999 aerial photographs shows residential-type buildings to the east and south of the subject property, railroad tracks to the north, and industrial activities to the west of the subject property. No items of environmental concern on adjacent properties are discernable from the aerial photographs. However, due to limited resolution/photo quality, no significant environmental observations indicating waste storage, disposal or releases could be discerned from the aerial photographs.
- The 1961 through 1994 topographic maps did not show any discernable items of environmental concern with the adjacent properties.
- The 1945 through 2003 city directory indicates the presence of residential and commercial business at the adjoining properties. In addition, the city directory identified an Elkhart Rubber Works, Inc. at 1629 Oakland Avenue (which is located at the subject property). The city directory abstract indicate that the Elkhart Rubber Works, Inc. facility has been operating at 1629 Oakland Avenue from 1945 through 1979.

5.0 *DATABASE AND GOVERNMENT RECORDS REVIEW*

5.1 *ENVIRONMENTAL DATABASE SEARCH*

ERM contracted EDR to conduct a database search for agency records. The report, presented in Appendix D, defines and summarizes the ASTM databases reviewed and notes if any sites (including the subject property) 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 or "orphan" sites for which inadequate location information was provided. ERM has reviewed the list of "orphan" sites to determine if these sites are within the study radius, as described below.

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

- distance from the subject property,
- expected depth and direction of groundwater 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 a presumed north-northwesterly groundwater flow gradient in the vicinity of the Site, towards the St. Joseph River.

5.1.1 *Subject Property*

The EDR report did not identify the subject property on any of the searched databases. However, the EDR report indicates the Site is within the study area (at the eastern edge) of the Conrail Rail Yard - National Priority List (NPL) site, identified below. The Conrail Rail Yard site consists of a 765-acre property that has been impacted by releases of carbon tetrachloride, oil, diesel fuel, hydrochloric acid, caustic soda, and degreasers. Impacts at the Conrail site have not been remediated.

5.1.2 *Surrounding Properties*

No properties were identified within the ASTM-specified search radii of the subject property in EDR's search of the Proposed NPL, RCRS-LQG, ERNS, SHWS, State Landfills, or VCP databases (the acronyms are defined in the EDR report). Several non-ASTM databases were also reviewed by EDR, with no mapped sites found in the CONSENT, Delisted NPL, FINDS, HMIRS, MLTS, NPL Liens, PADS, DOD, INDIAN RESERV, ODI, UMTRA, FUDS, RAATS, TRIS, TSCA, SSTS, FTTS, IN Spills, BULK and DRYCLEANERS (see EDR report).

The following nearby sites were identified within the ASTM-specified search radii on one or more of the specified databases:

1. Conrail Rail Yard (Elkhart), SR 33
   Database(s): CERCLIS, RCRA-SQG, FINDS, IN Spills, NPL, ROD

2. ARA Mfg. Co., 1317 Indiana Avenue
   Database(s): RCRA-SQG

3. Gano Plywood, Inc., 1334 West Wolf Avenue
   Database(s): LUST, UST

4. Seldom Rest Body Shop, 1317 West Indiana Avenue
   Database(s): RCRIS-SQG, FINDS

5. Benham West Brainfield Site, 10th Street/Indiana Avenue
   Database(s): US Brownfields

6. Elkhart Operating Headquarters, 907 Oakland Avenue
   Database(s): UST

7. Patrick Metals Elkhart, 1819 South 14th Street
   Database(s): RCRIS-SQG, FINDS, CORRACTS, CERC-NFRAP

8. Fidler, Inc., (no address reported)
   Database(s): MINES (sand and gravel)

9. Hermaseal Co., 1101 Lafayette Street
   Database(s): RCRIS-SQG, FINDS, TRIS, RCRA-TSDF, CORRACTS

10. American Electronic Components-LAF, 1101 Lafayette Street
    Database(s): RCRA-SQG

11. Hermaseal Co., 1101 Lafayette Street
Database(s): RCRA-SQG

12. Smoke Express #3, 1589 West Franklin Street
Database(s): LUST, UST

13. Oakland Auto Service, 1207 West Lusher Avenue
Database(s): LUST, UST

ERM evaluated the information provided by EDR to determine the potential for these sites to adversely impact the subject property. Based on the location and status of the sites listed above, and a presumed northwesterly groundwater flow gradient, site #1 appears to pose a potential for impacting the subject property. Therefore, this site is considered to a REC to the subject property.

Seventeen (17) "orphan" sites listed in the EDR report could not be located due to insufficient data and further investigation to determine the potential for these orphan sites impact the subject site was not within the scope of this assessment.

5.2 *GOVERNMENT RECORDS REVIEW/INTERVIEWS*

5.2.1 *Local Agencies*

On 8 February 2005, ERM contacted Fire Chief Dennis Man of the City of Elkhart for information regarding former operations, USTs, and hazardous substance use/storage at the subject property. Mr. Man reported that there were no documents of any releases from USTs or ASTs at the subject property. Mr. Man could not recall if the subject property has any UST or ASTs. Mr. Man reported that there were some small fires at the subject property in the past twenty (20) years and that a building at the property did burned to the ground. Mr. Man also reported that there was a release of anhydrous ammonia approximately 20 years ago, from a railroad tanker located at the railroad station situated north-northwest of the subject property.

ERM submitted a Freedom of Information Act (FOIA) request to the City of Elkhart Public Works and Utilities Administration (City) for information on the subject property. City personnel found records on the subject site associated with an Industrial Wastewater Discharge Permit No. 97-01. The Wastewater Discharge Permit was effective dated July 1, 2003 and expires on July 1, 2008. The permit requires monitoring of the discharged wastewater for metals and other industrial compounds and

the submittal of periodic reports (see copy of permit for specific compound). A letter from the City dated 28 January 2002, reported that ANEWCO has been a permitted discharger since 1997, and during that time the company has experienced three effluent violations (1997, 1999, and 2000), and have filed thirteen (13) late reports. No other notices of violations have been reported since the 28 January 2002 letter. Copies of the City of Elkhart records are presented in Appendix E.

5.2.2 *State Agencies*

A FOIA request dated 8 February 2005 was made to the IDEM for information on the subject property. In addition, a FOIA request dated 17 February 2005, was made to the Elkhart County Health Department – Environmental Health Division (ECHD-EHD).

The IDEM did not have any records on the subject property. The ECHD-EHD did not have any files on the subject property but reported a nearby LUST site. The LUST site was located at the corner of Wolf Avenue and 13th Street (south and potentially upgradient of the subject property). The LUST site had a release in 1990; however, the ECHD-EHD did not have any other records on the LUST site. This LUST site presents a REC to the subject property.

6.0 *PHASE II ESA INVESTIGATION*

The following RECs were identified by the Phase I ESA conducted in connection with the subject property:

- Review of a 1917 Sanborn map revealed a 270-gallon gasoline tank located along the south wall of Elkhart Rubber Works building. Potential releases associated with the gasoline tank operation represents a REC to the Site;

- Review of the 1917, 1927, 1950 and1968 Sanborn maps revealed a vulcanization tank located along the southern wall of the Elkhart Rubber Works building. Potential releases associated with the vulcanization tank operation represents a REC to the Site;

- Review of the 1950 and 1968 Sanborn maps revealed a machine shop that was located south of the office area. Potential releases associated with the machine shop operations represents a REC to the Site;

- Review of the 1950 and 1968 Sanborn maps revealed a dip tank that was located in the northwest corner of the southern building. Potential releases associated with the dip tank operation represents a REC to the Site;

- Review of the 1917, 1927 and 1950 Sanborn maps revealed an oil house south of the Elkhart Rubber Works Building. Potential releases associated with the oil house operation represents a REC to the Site;

- Review of the EDR database reported revealed that the subject property is located on the northeastern corner of the Conrail Rail Yard National Priority List (NPL) site boundary. The 765-acre NPL site has been impacted by releases of carbon tetrachloride, oil, diesel fuel, hydrochloric acid, caustic soda, and degreasers. Although specific locations of contamination have not been inquired by this investigation, past releases at the NPL site represents a REC to the Site; and,

- The ECHD-EHD reported a LUST site at the corner of Wolf Avenue and 13th Street (potentially upgradient). This site presents a REC to the subject property.

An investigation of soil and groundwater was conducted at the Site to determine if contaminants are present at concentrations that may trigger remediation obligations or enforcement actions by the IDEM. The field procedures and findings are discussed below.

6.1 *FIELD ACTIVITIES*

On 23, 24 and 25 February 2005, seventeen (17) geoprobe borings (GP-1 through GP-14, and MW-1 through MW-3) were conducted on the subject property at the locations shown on Figure 4. The borings were advanced with a Geoprobe® drill rig by Terra Probe Environmental, Inc. of Ottawa Lake, Michigan. Soil samples were collected continuously for geologic logging and field screening with an iso butylene-calibrated photoionization detector (PID). The PID is capable of detecting volatile organic compounds (VOCs), albeit at a higher detection limit than in a laboratory analysis. PID readings were used to screen for potentially VOC-affected soils, and to select the sample interval for laboratory-analyzed samples. Groundwater samples were collected from temporary wells screened within the upper three (3) to four (4) feet of the water table, which was present at depths ranging between 16 and 20 feet below ground surface (bgs). Boring logs with field observations are presented in Appendix F.

Screening of the soil samples collected from the borings did not indicate any potential contamination (PID readings < 1 part per million [ppm] and no visual indications such as staining), with the exception of soils collected from GP-4, GP-7, GP-9, GP-11, GP-13, MW-1, MW-2, and MW-3. Soils from GP-7, GP-9, GP-11 and GP-13 had coke or coal fill material within the upper 1.5-feet of soil. A slight petroleum odor was detected in soils collected from GP-4 (8 - 20'), MW-1 (10 - 20'), MW-2 (10 - 23'), and MW-3 (12 - 20'). In addition, a trace of coal was observed at MW-1 (0.5 - 7.8'), and PID readings of 28 ppm and 30 ppm were noted at MW-2 (8 - 16'). Soils encountered in borings conducted at the Site generally consisted of dark brown or black silty sands with occasional thin lenses of gravel or clay, and some building debris (brick, concrete) in the upper foot of soil. Soils from approximately 1 to 23 feet bgs consisted of fine to medium grained sands with some silt.

6.2 *SOIL AND GROUNDWATER SAMPLE COLLECTION*

Based upon the findings identified by this Phase I ESA, investigation was conducted to evaluate the RECs. The table below identifies the on-site RECs and the corresponding borings conducted to evaluate the concern. Figure 4 depicts the sampling locations.

Recognized Environmental Condition (RECs)	*Boring/Temporary Well*
Former Machine Shop	GP-1, GP-2, GP-3, GP-4
Former Laboratory	GP-5, GP-6
Former Vulcanization Tank	GP-7, GP-8
Former 270-Gallon Gasoline Tank	GP-9, GP-10
Former Oil House	GP-11, GP-12
Former Dip Tank	GP-13, GP-14
General Groundwater Characterization	MW-1, MW-2, MW-3

Note: Soil and/or groundwater samples were selectively collected from borings for laboratory analyses based on field assessment and specific contaminants of concern. No samples from locations GP-1, GP-2, GP-5, or GP-9 were analyzed.

Samples collected for laboratory analysis were placed in clean, labeled jars and transported in an iced cooler to e-Lab of Holland, Michigan for analysis under chain-of-custody forms presented in Appendix G. Analytical parameters were selected based upon the following rationale:

- Volatile Organic Compounds (VOCs) - associated with petroleum hydrocarbons;
- Semi-Volatile Organic Compounds (SVOCs) - associated with petroleum hydrocarbons and waste oils;
- Metals - associated with historical vulcanization operations;
- Sulfate - associated with historical vulcanization processes;
- Polychlorinated Biphenyls (PCBs) - associated with various industrial uses, transformers and other electrical equipment, waste oils, certain paint formulations.

All sampling and analytical methodologies were consistent with U.S. EPA and IDEM protocol.

6.3 *SOIL AND GROUNDWATER ANALYTICAL RESULTS*

Analytical results are compared to Risk Integrated System of Closures (RISC) cleanup criteria generated by IDEM dated 1 January 2004. Cleanup criteria have been developed for residential and industrial/commercial land uses. The laboratory report and chain-of-custody are included in Appendix G. The results in Tables 1 (soil) and 2 (groundwater) compare the sample analyses to both the default residential and industrial closure levels (Appendix H). Residential levels are presented for comparative purposes to levels safe for unrestricted (*i.e.*, residential) land use. The industrial levels are presented for comparative purposes to levels safe for industrial land use. Comparison to residential criteria is made since these are the levels above which a property could be considered contaminated.

6.3.1 *Soil Data Evaluation*

Exceedances of criteria (residential and/or industrial) were identified at GP-3 (1 - 4'), GP-7 (0 - 3'), GP-10 (0 - 3'), GP-11 (0 - 3'), GP-13 (1 - 2'), and GP-14 (0.5 - 1.5').

GP-3 (1 - 4'): this sample was collected south of the former machine shop; arsenic was detected above residential criteria; concentrations did not exceed industrial criteria;

GP-7 (0 - 3'): this sample was collected near the southeast side of the former vulcanization tank; arsenic and SVOCs - benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenzo(a,h)anthracene, indeno(1,2,3-cd)pyrene, and naphthalene were detected above residential criteria; all concentrations exceeded industrial criteria with the exception of arsenic and naphthalene;

GP-10 (0 - 3'): this sample was collected on the west end of the former gasoline tank; arsenic and lead were detected above residential criteria; lead concentration exceeded industrial criteria;

GP-11 (0 - 3'): this sample was collected on the north side of the former oil house; arsenic was detected above residential criteria; concentration did not exceed industrial criteria;

GP-13 (1 - 2'): this sample was collected north of the former dip tank located in the south building; arsenic was detected above criteria; concentration did not exceed industrial criteria; and

GP-14 (0.5 - 1.5'): this sample was collected west of the former dip tank located in the south building; arsenic was detected above criteria; concentration did not exceed industrial criteria.

6.3.2 *Groundwater Data Evaluation*

As indicated in Table 2, groundwater samples were collected from GP-3, GP-4, GP-6, GP-8, GP-10, GP-12, GP-14, MW-1, MW-2, and MW-3 to address each of the on-site RECs. No exceedances of IDEM criteria were identified at these locations.

6.3.3 *Trip Blank Data Evaluation*

As part of the laboratory quality assurance and quality control (QA/QC) program, two (2) trip blank samples were analyzed for VOCs. Trip blank #1 consisted of water and trip blank #2 consisted of methanol. Trip blank

#1 had concentrations of 1,1,1-trichloroethane (15 µg/L) and tetrachloroethene (2.6 µg/L that was slightly above the laboratory detection limit). Concentrations of 1,1,1-trichloroethane were detected in other samples collected from the subject property and was below IDEM residential cleanup criteria. No concentrations of tetrachloroethene were detected in any other samples collected from the subject property. Trip blank #2 did not have any concentrations of VOCs above the laboratory detection limits. Further evaluation of the data has been requested of the laboratory.

7.0 *ASBESTOS ASSESSMENT*

7.1 *PACM IDENTIFICATION/LOCATION*

Mr. Daniel R. Rusiecki of ERM conducted a visual walk-through of the buildings on 23 February 2005. The inspection of the buildings, involved identifying accessible friable and non-friable presumed asbestos-containing materials (PACMs) within the entire interior portions of the buildings; delineating homogeneous materials; quantifying the homogeneous materials; assessing the condition of the PACMs; and assessing the potential for disturbance of the PACMs. The homogeneous PACM (referring to material that is uniform in color and texture) identified during this limited inspection was documented on Homogeneous Materials Sheets found in Appendix I.

The areas in which each specific homogeneous material was found are noted in the Functional Area column of the Homogeneous Materials Sheets. The condition and friability of each material were assessed on-site and recorded on the Homogeneous Materials Sheet. The condition of the material was assessed for damage (*i.e.*, good, damaged, or significantly damaged) and if the material was friable or non-friable. The damage assessment was conducted as follows:

- Good (intact) - indicates that the material does not appear to show any signs of water, physical, or deterioration damage;
- Damaged - indicates that the material shows signs of water, physical, or deterioration damage which has localized damage of less than 25% or general damage of less than 10%; and
- Significantly damaged - indicates that the material shows signs of water, physical, or deterioration damage which has localized damage of more than 25% or general damage of more than 10%.

As a final inspection criterion, the materials were assessed for the potential for disturbance. The potential for disturbance is determined by evaluating four (4) factors (*i.e.*, accessibility, air erosion, frequency of contact, and vibration) and the level of potential disturbance (*i.e.*, low [L], moderate [M], and high [H]). The factors and levels of potential disturbance are delineated as follows:

- Accessibility - refers to materials that can be reached by the building occupants or custodial/maintenance personnel, either directly or with equipment or other objects;
- Air Erosion - refers to the potential for an air stream to erode a PACM surface causing fibers to be released;

- Frequency of Contact - refers to the potential for physical contact of a PACM which may cause fibers to be released;
- Vibration - refers to activities that would potentially create vibration of the PACM which accelerates the fiber release process;
- Low (L) - indicates that the material is not accessible, not subject to vibration, contact, or air erosion;
- Moderate (M) - indicates that the material is accessible, subject to vibration, contact, or air erosion but these materials are not disturbed on a regular basis; and
- High (H) - indicates that the material is accessible, subject to vibration, contact, or air erosion on a regular basis.

Inspection of the office area revealed suspended ceiling tiles consisting of fiberglass which was considered to be non-PACM. The fire doors and roofing material on the roof of the building were not sampled and were considered to be PACM.

7.2 *SAMPLE COLLECTION AND ANALYTICAL METHODS*

Mr. Rusiecki of ERM collected representative samples of PACMs from the building on 23 February 2005. Samples were collected from each PACM homogeneous material in accordance with Federal Regulations found in the Federal Register, Volume 52, No. 210, page 48419, Section 763.86, and per 29 CFR 1926.1101 section (k)(4)(B). Prior to sampling, all surface areas were moistened using a surfactant wetting agent to prevent the release of potential asbestos fibers. A section of the material was then cut, and a sample was retrieved and placed into an air tight, sealed container. After collection, the sample holes were sealed with a spackling compound. An Asbestos Sample Location/Analytical Results Sheet, which details the locations of the samples, is provided in Appendix J.

The samples were sent on 25 February 2005 to Environmental Hazards Services, L.L.C. (EHS) located at 7469 White Pine Road, Richmond, Virginia. EHS received the samples on 1 March 2005, and analyzed the samples for asbestos using polarized light microscopy (PLM) per EPA 600/R-93/116 test method.

7.3 *ASBESTOS ANALYSIS RESULTS*

The analytical results are presented on the EHS report in Appendix L and summarized on the Asbestos Sample Location/Analytical Results Sheets, in Appendix J. The analytical results reveal that the following

homogeneous material contains asbestos minerals, which make up more than 1% of the analyzed material:

E - Boiler Wall Insulation;
F - Mud Joint;
G - Mag Block Pipe Insulation;
H - Fire Door (PACM); and
I - Roofing (PACM).

The locations of homogeneous friable and non-friable ACMs and PACMs are shown on Figure 5.

Samples of homogeneous materials that did not contain asbestos minerals above 1% are as follows:

A - Brown Decorative Rolled-on Flooring;
B - Plaster Wall;
C - Gold Decorative Rolled-on Flooring; and
D - Cardboard Pipe Insulation.

8.0 CONCLUSIONS AND RECOMMENDATIONS

ERM completed a Phase I and II Environmental Site Assessment of the ANEWCO facility located at 1631 Oakland Avenue, Elkhart, Indiana. The assessments were performed in accordance with ERM's proposals dated 31 January 2005, and 16 February 2005, and in general conformance with the scope and limitations of ASTM Practice E 1527-00 (Phase I). Any exceptions to, or deletions from, the project scope of work are described in the applicable sections of this report.

Based on the information and data obtained during this investigation, ERM's assessment has revealed no evidence of RECs in connection with the subject property, with the exception of the following:

- Review of a 1917 Sanborn map revealed a 270-gallon gasoline tank located along the south wall of Elkhart Rubber Works building. Contaminants associated with the gasoline tank operation represents a REC to the Site;

- Review of the 1917, 1927, 1950 and1968 Sanborn maps revealed a vulcanization tank located along the southern wall of the Elkhart Rubber Works building. Contaminants associated with the vulcanization tank operation represents a REC to the Site;

- Review of the 1950 and 1968 Sanborn maps revealed a machine shop that was located south of the office area. Contaminants associated with the machine shop operations represents a REC to the Site;

- Review of the 1950 and 1968 Sanborn maps revealed a dip tank that was located in the northwest corner of the southern building. Contaminants associated with the dip tank operation represents a REC to the Site;

- Review of the 1917, 1927 and 1950 Sanborn maps revealed an oil house south of the Elkhart Rubber Works Building. Contaminants associated with the oil house operation represents a REC to the Site; and

- Review of the EDR database reported revealed that the subject property is located on the northeastern corner of the Conrail Rail Yard NPL site boundary. The 765-acre NPL site has been impacted by releases of carbon tetrachloride, oil, diesel fuel, hydrochloric acid, caustic soda, and degreasers. Although specific locations of contamination have not been inquired by this investigation, past releases at the NPL site represents a REC to the Site.

- The ECHD-EHD had files on a nearby LUST site located at the corner of Wolf Avenue and 13th Street (south and potentially upgradient of the subject property). A release occurred at the site in 1990, and presents a REC to the subject property.

The following are ERM's conclusions and recommendations based on the Phase II investigation of the RECs:

- Soil – IDEM cleanup criteria exceedances for arsenic, lead, and/or SVOCs were detected in GP-3 (1 - 4'), GP-7 (0 - 3'), GP-10 (0 - 3'), GP-11 (0 - 3'), GP-13 (1 - 2'), and GP-14 (0.5 - 1.5'). The source of the impact appears to be from releases associated with gasoline tank and other historical operations.

  Arsenic was detected in six samples (GP-3, GP-7, GP-10, GP-11, GP-13 and GP-14) exceeding residential contact criteria, none exceeded industrial cleanup criteria. Based on the planned industrial use of the property, no further testing is recommended.

  Lead was detected in one sample (GP-10) at a concentration exceeding both the residential and industrial contact criteria. This sample was collected near the former gasoline tank and the elevated lead concentrations may be associated with leaded gasoline. Additional investigation is recommended to determine the extent of soil impacted above industrial cleanup criteria and to estimate the cost for remediation.

  Several SVOCs were detected above residential and industrial cleanup criteria at GP-7, which was conducted adjacent to the former vulcanization tank. Five (5) SVOCs parameters exceeded industrial criteria. Black fill material was noted in this sample, but otherwise no obvious evidence of contamination. Analysis of soil samples collected from nearby borings GP-7, GP-8, and GP-11 did not indicate elevated concentrations of lead; therefore, this is likely to be an isolated condition. Additional investigation is recommended to determine the extent of soil impacted above industrial cleanup criteria and to estimate the cost for remediation.

- Groundwater – No exceedences of IDEM cleanup criteria were identified. No further investigation of groundwater is recommended.

- ACMs – Five (5) homogeneous materials were identified as ACMs or PACMs. It is recommended that prior to any renovation or demolition activities conducted at the subject property, these materials should be properly removed and managed by a certified asbestos abatement

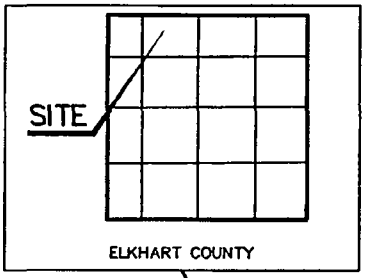
contractor and proper notifications should be submitted to the appropriate government agencies.

9.0 *QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONALS CONDUCTING THIS ASSESSMENT*

This assessment was conducted by Dan Rusiecki of ERM. This report was reviewed by Tom O'Connell of ERM. The professional qualifications for these ERM employees are included in Appendix L.

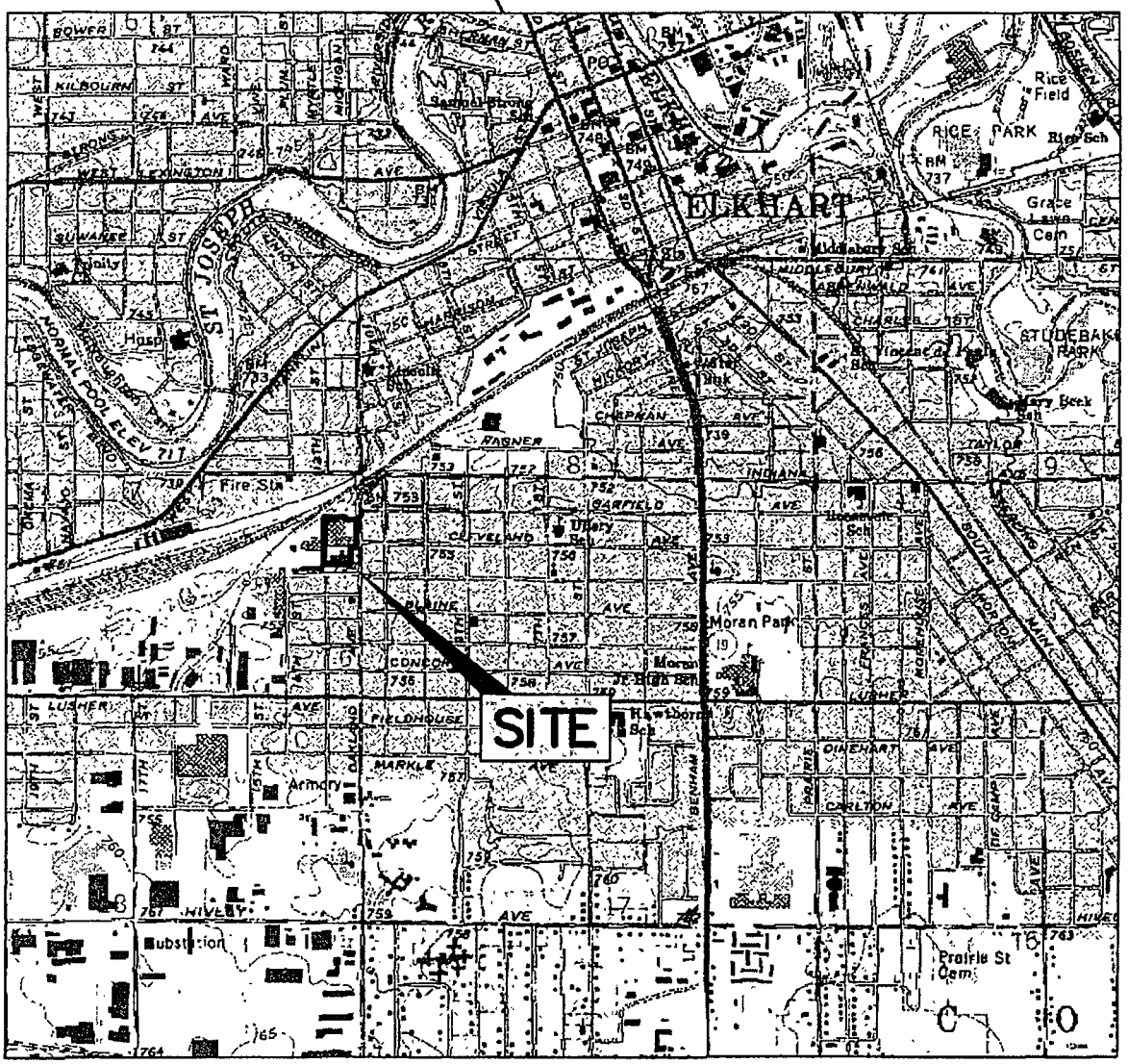
Figures

- *Figure 1 – Site Location Map*
- *Figure 2 – Site Map*
- *Figure 3 – Building Enlargement*
- *Figure 4 - Sampling Location Map*
- *Figure 5 – Asbestos-Containing Material Location Map*



SECTION 7
T.37N. – R.5E.
CITY OF ELKHART
ELKHART COUNTY
INDIANA

0 2000
SCALE (IN FEET)



SITE LOCATION MAP

ADAPTED FROM USGS
ELKHART/1961–REVISED/1994

REVISIONS ARE TO BE MADE ON THE CADD FILE ONLY

ERM.	**STURGIS IRON AND METAL** 1631 OAKLAND AVENUE ELKHART, INDIANA	CADD Review RMR CHK'D DRR 0027887
Drawn By GML–02/21/05	Environmental Resources Management	FIGURE 1

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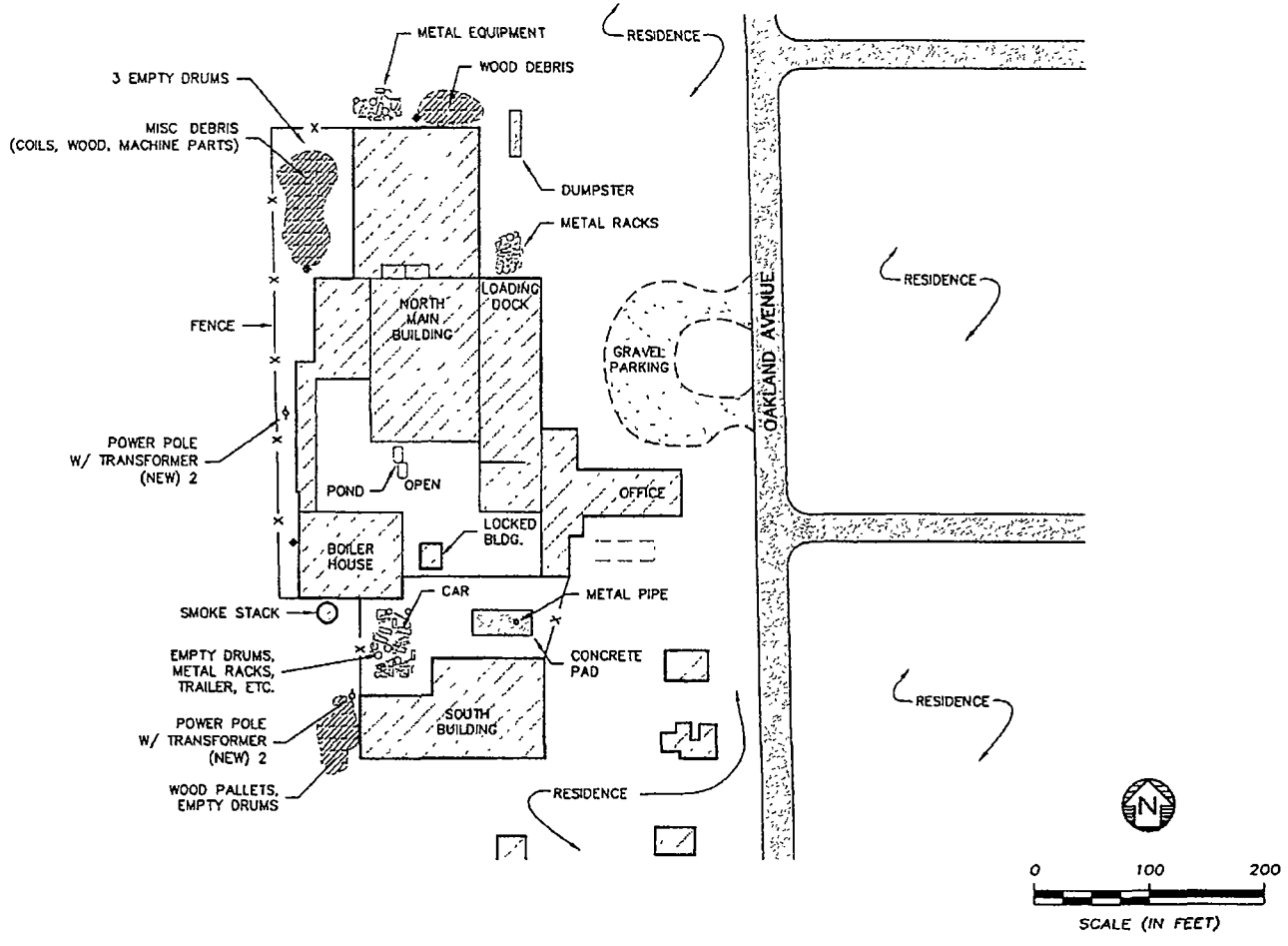
SITE MAP



Drawn By GML	ERM.	**STURGIS IRON AND METAL** 1631 OAKLAND AVENUE ELKHART, INDIANA	CHK'D DRR
CADD Review RMK			0027887
Date Drawn/Rev'd 2/21/04		Environmental Resources Management	FIGURE 2

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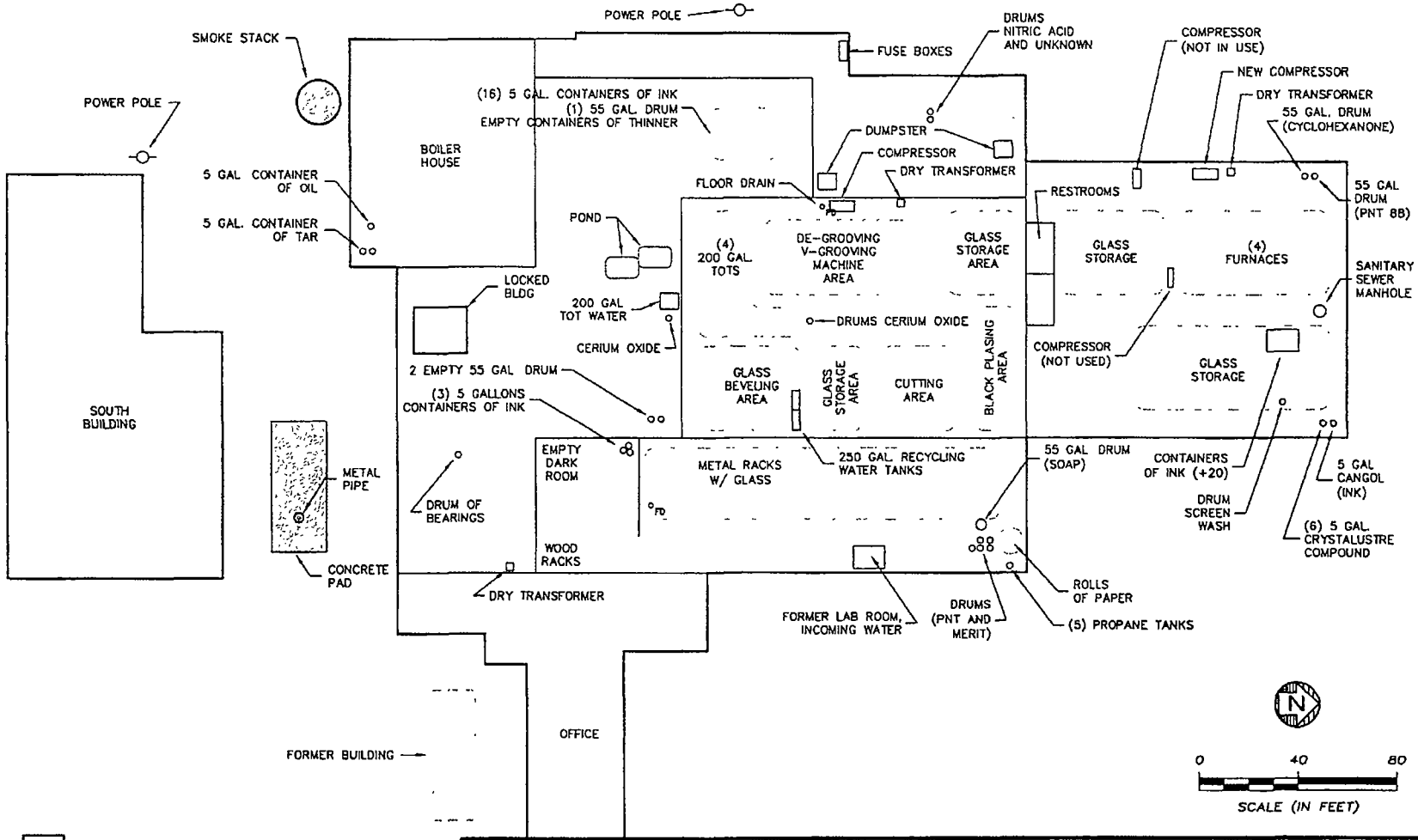
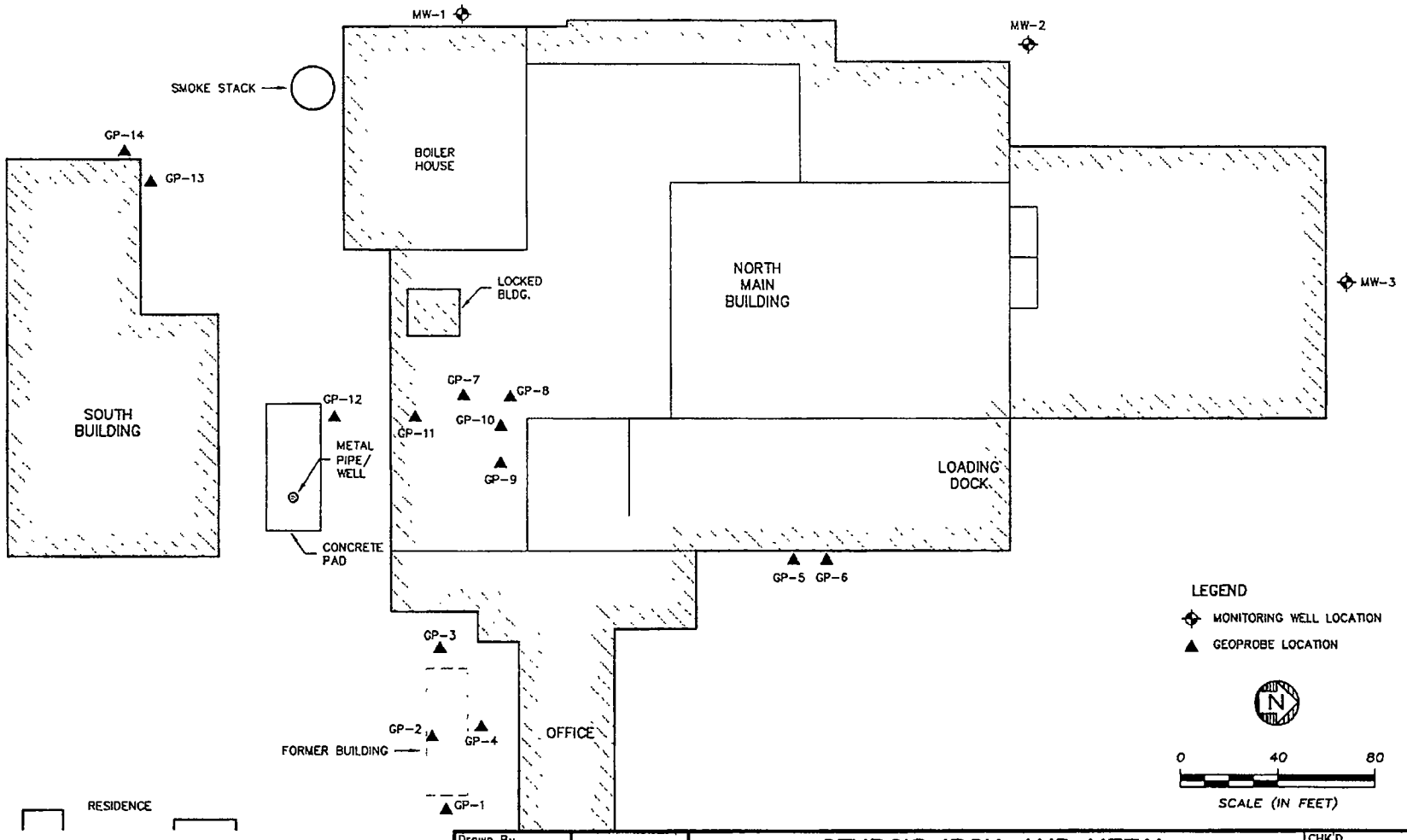
BUILDING ENLARGEMENT



Drawn By GML	ERM.	STURGIS IRON AND METAL 1631 OAKLAND AVENUE ELKHART, INDIANA	CHK'D
CADD Review			0027887
Date Drawn/Rev'd 2/21/04		Environmental Resources Management	FIGURE 3

R:\CADD\CHKD-T1\Sturgis Iron and Metal\0027887\ELKHART SITE\0027887-02.dwg, BUILDING, 3/24/2005 4:19:10 PM, FAK

SAMPLE LOCATION MAP



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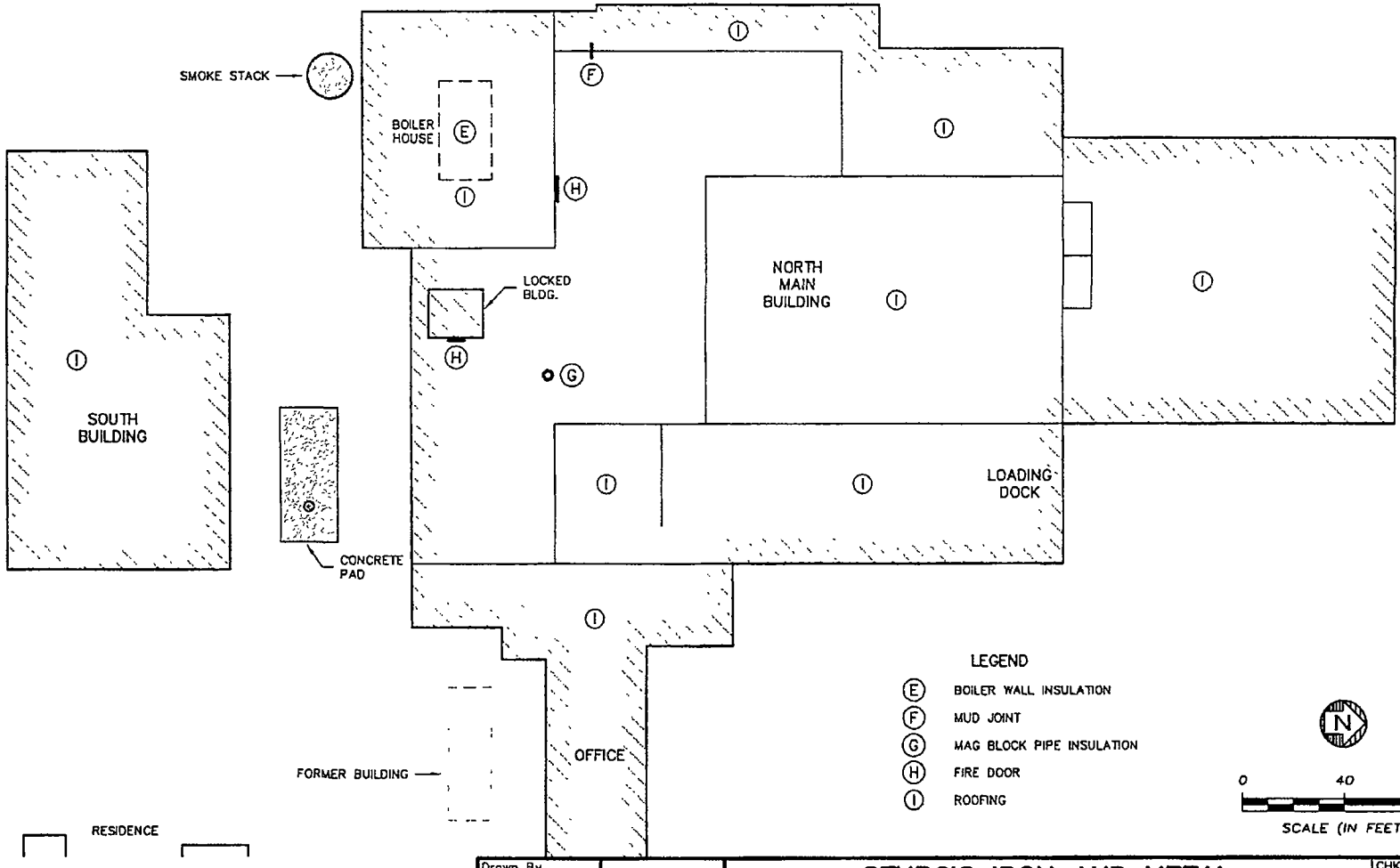
Drawn By GML	ERM.	STURGIS IRON AND METAL 1631 OAKLAND AVENUE ELKHART, INDIANA	CHK'D TPO
CADD Review RMK			0027887
Date Drawn/Rev'd 2/21/04		Environmental Resources Management	FIGURE 4

ASBESTOS – CONTAINING MATERIAL LOCATION MAP



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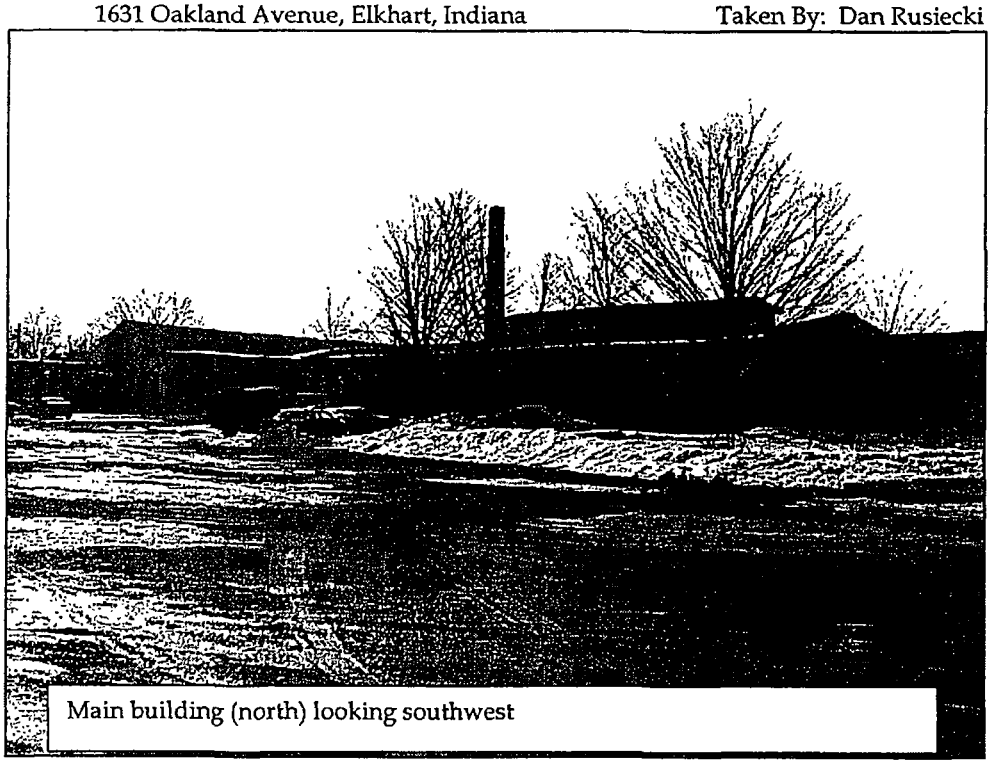
CADD Review RMK			0027887
Date Drawn/Rev'd 2/21/04		Environmental Resources Management	FIGURE 5

R:\CADD\Cint\O-T\Sturgis Iron and Metal\0027887\ELKHART SITE\0027887-02.dwg, ASBESTOS MAP, 3/24/2005 4:45:38 PM, FAK

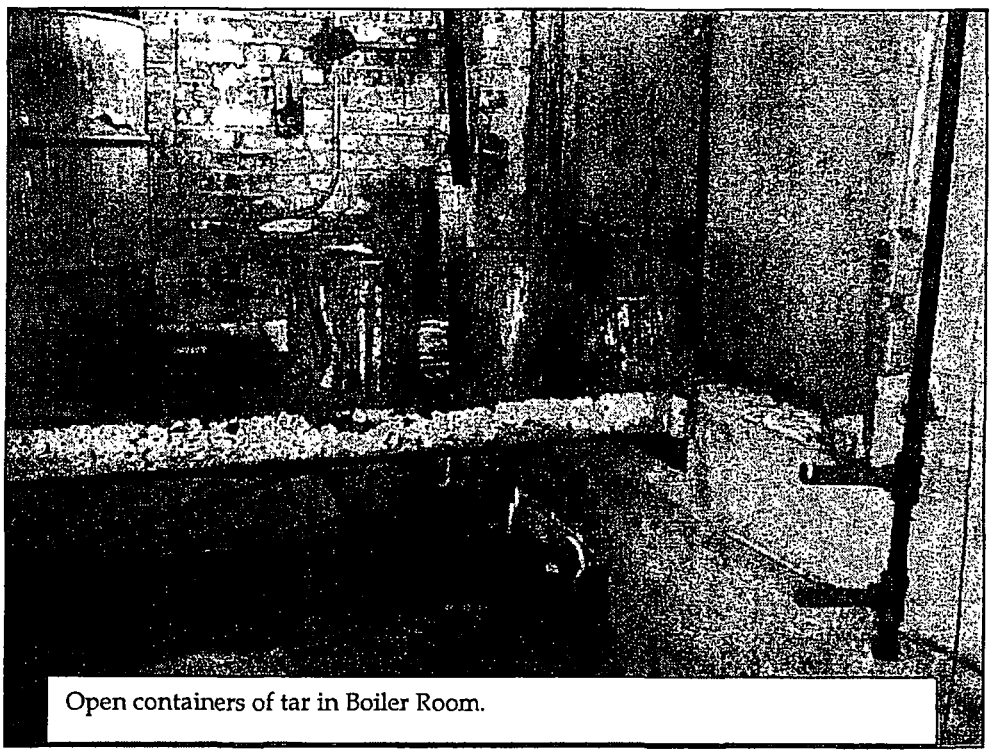
Appendix A
Site Photographs

Site: Sturgis Iron & Metal
1631 Oakland Avenue, Elkhart, Indiana

Photo Date: 02/02/05
Taken By: Dan Rusiecki



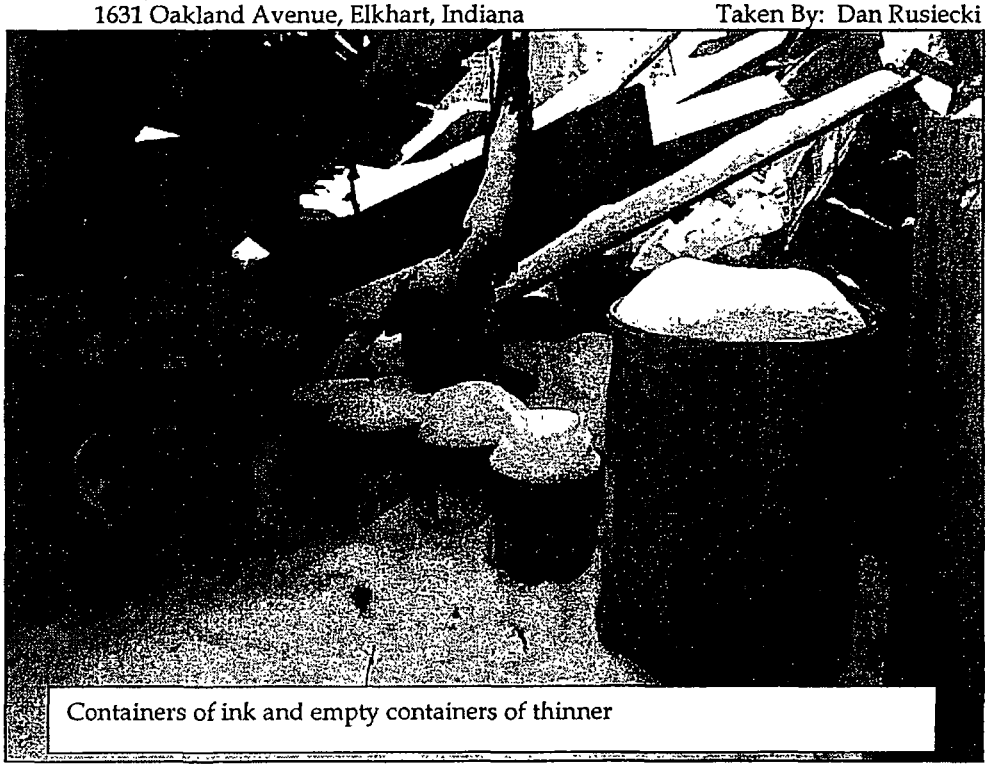
Main building (north) looking southwest



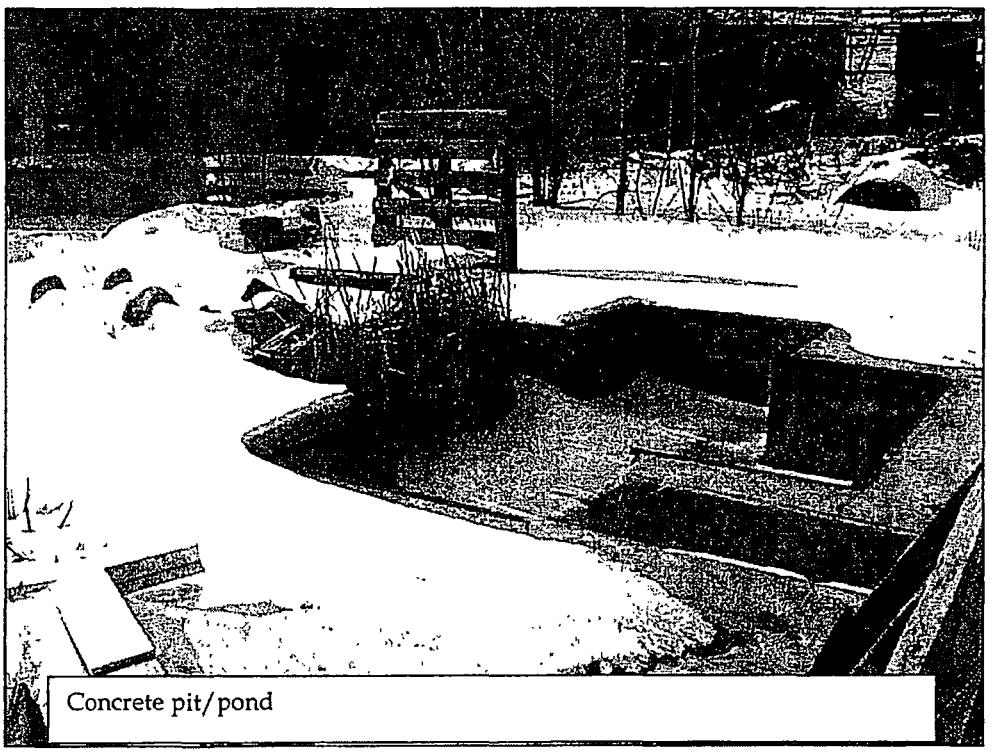
Open containers of tar in Boiler Room.

Site: Sturgis Iron & Metal
1631 Oakland Avenue, Elkhart, Indiana

Photo Date: 02/02/05
Taken By: Dan Rusiecki



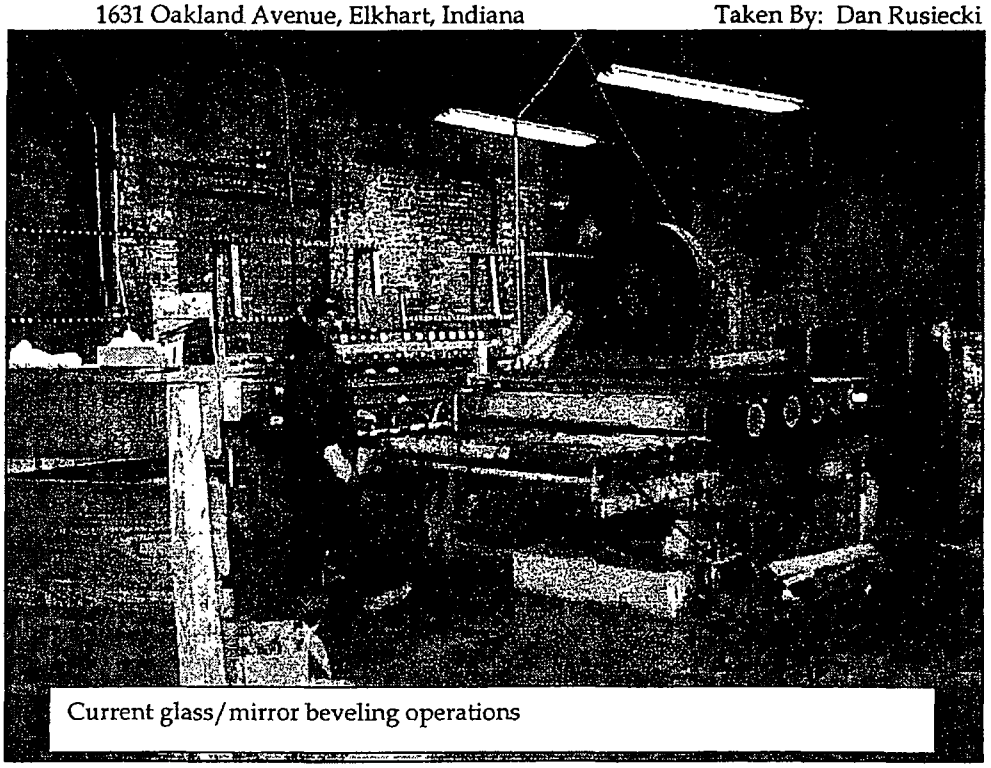
Containers of ink and empty containers of thinner



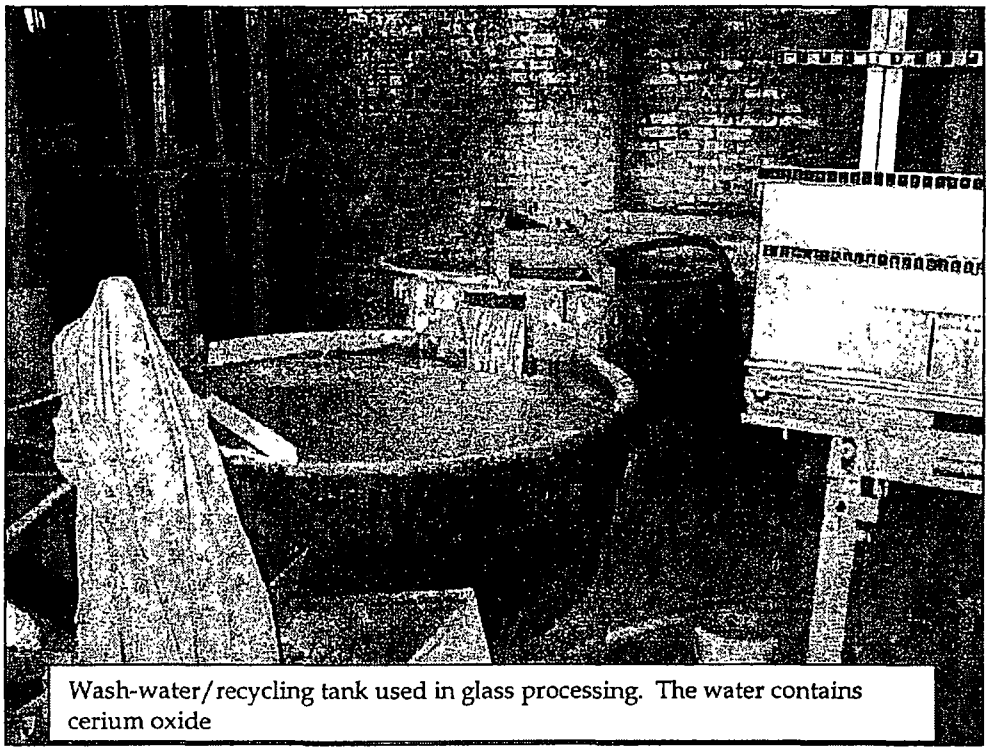
Concrete pit/pond

Site: Sturgis Iron & Metal
1631 Oakland Avenue, Elkhart, Indiana

Photo Date: 02/02/05
Taken By: Dan Rusiecki



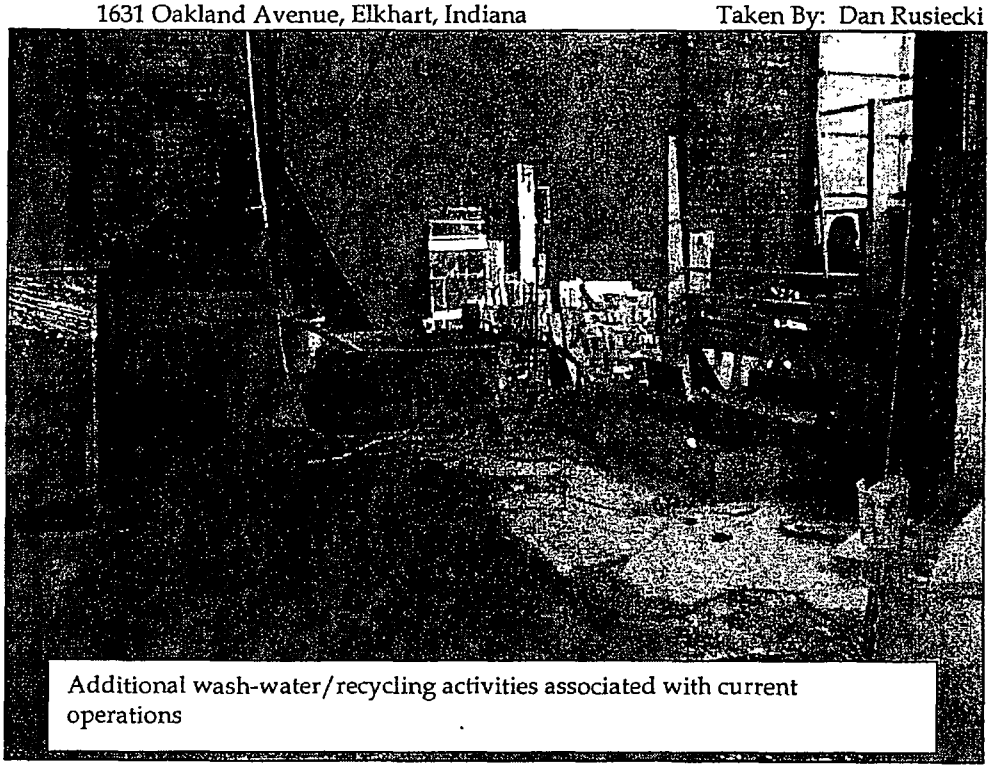
Current glass/mirror beveling operations



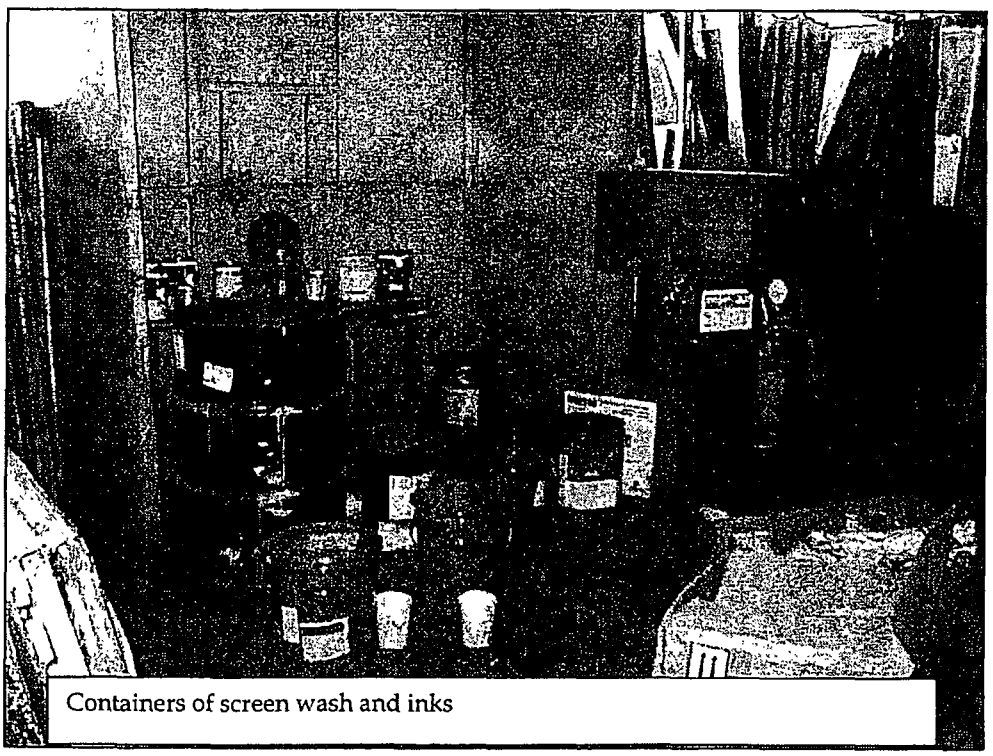
Wash-water/recycling tank used in glass processing. The water contains cerium oxide

Site: Sturgis Iron & Metal
1631 Oakland Avenue, Elkhart, Indiana

Photo Date: 02/02/05
Taken By: Dan Rusiecki



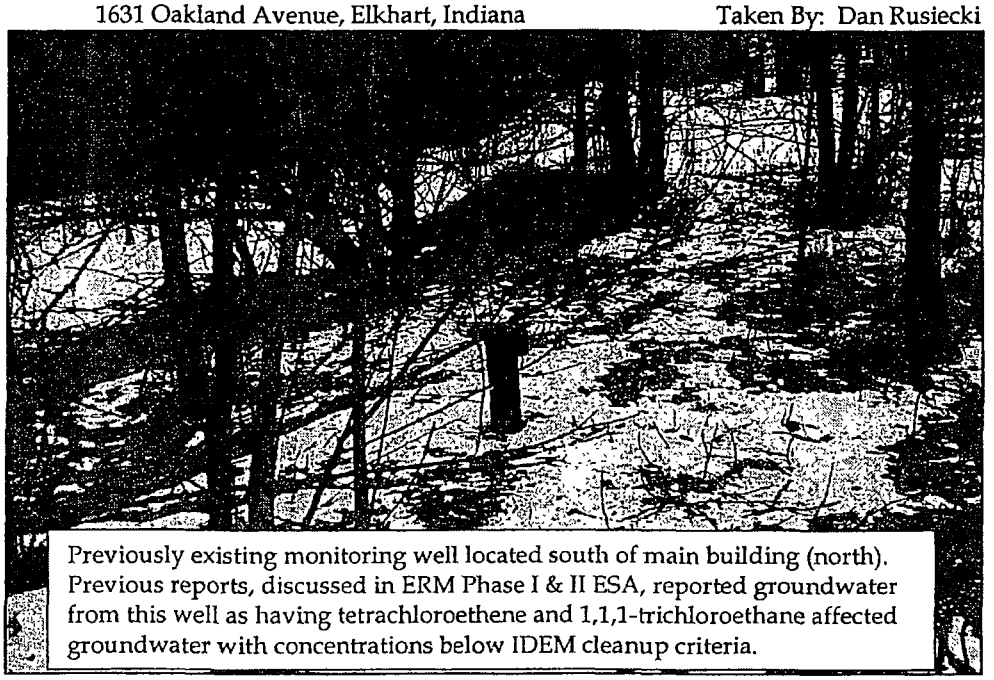
Additional wash-water/recycling activities associated with current operations



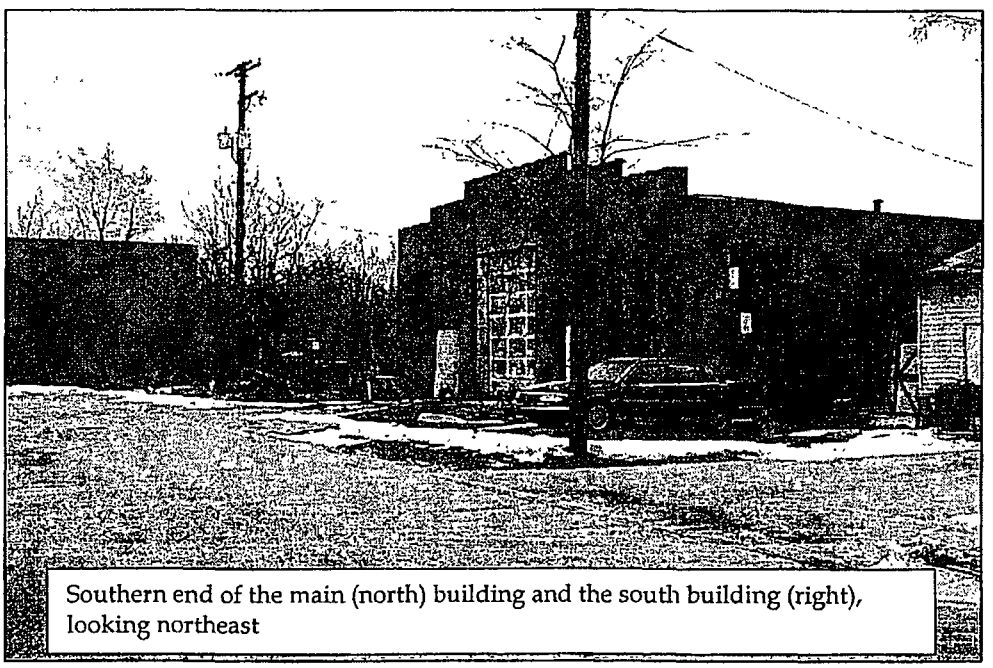
Containers of screen wash and inks

Site: Sturgis Iron & Metal
1631 Oakland Avenue, Elkhart, Indiana

Photo Date: 02/11/05
Taken By: Dan Rusiecki



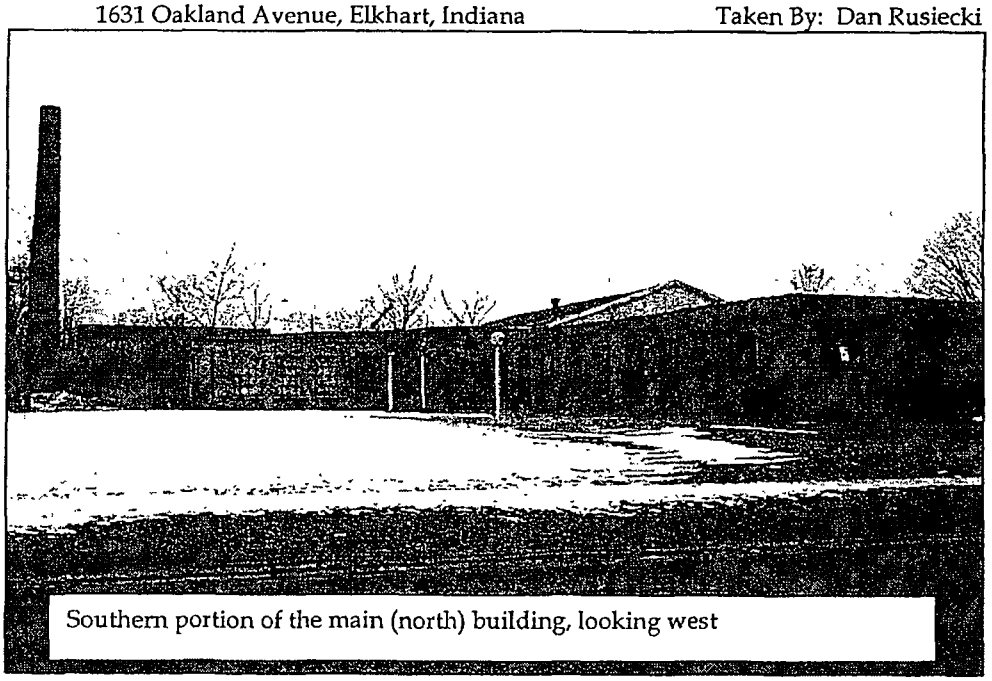
Previously existing monitoring well located south of main building (north). Previous reports, discussed in ERM Phase I & II ESA, reported groundwater from this well as having tetrachloroethene and 1,1,1-trichloroethane affected groundwater with concentrations below IDEM cleanup criteria.



Southern end of the main (north) building and the south building (right), looking northeast

Site: Sturgis Iron & Metal
1631 Oakland Avenue, Elkhart, Indiana

Photo Date: 02/11/05
Taken By: Dan Rusiecki



Southern portion of the main (north) building, looking west

Appendix B
Site Information

Appendix C
Historical Review Documents

EDR™ Environmental Data Resources Inc

"Linking Technology with Tradition"®

Sanborn® Map Report

Ship To: Dan Rusiecki
ERM, Inc.
3352 128th Avenue
Holland, MI 49424

Order Date: 1/31/2005 **Completion Date:** 2/1/2005
Inquiry #: 1351823.3S
P.O. #: 0027887
Site Name: Sturgin Iron and Metal
Address: 1631 Oakland Avenue
City/State: Elkhart, IN 46516
Cross Streets:

Customer Project: DDHC
1681019DPM 616-399-3500

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

1910 - 1 Map
1917 - 1 Map
1927 - 2 Maps
1950 - 2 Maps
1968 - 2 Maps

Limited Permission to Photocopy Total Maps: 8

ERM, Inc (the client) is permitted to make up to THREE photocopies of this Sanborn Map transmittal and each fire insurance map accompanying this report solely for the limited use of its customer. No one other than the client is authorized to make copies. Upon request made directly to an EDR Account Executive, the client may be permitted to make a limited number of additional photocopies. This permission is conditioned upon compliance by the client, its customer and their agents with EDR's copyright policy; a copy of which is available upon request.

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USER'S GUIDE

This User's Guide provides guidelines for accessing Sanborn Map® images and for transferring them to your Word Processor.

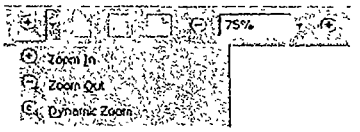
ıding Sanborn Maps

- Sanborn Maps document historical property use by displaying property information through words, abbreviations, and map symbols. The Sanborn Map Key provides information to help interpret the symbols and abbreviations used on Sanborn Maps. The Key is available from EDR's Web Site at: http://www.edrnet.com/reports/samples/key.pdf

Organization of Electronic Sanborn Image File

- Sanborn Map Report, listing years of coverage
- User's Guide
- Oldest Sanborn Map Image
- Most recent Sanborn Map Image

Navigating the Electronic Sanborn Image File

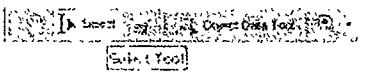


1. Open file on screen.
2. Identify TP (Target Property) on the most recent map.
3. Find TP on older printed images.
4. Using Acrobat® Reader®, zoom to 250% in order to view more clearly. (200-250% is the approximate equivalent scale of hardcopy Sanborn Maps.)
   A. On the menu bar, click "View" and then "Zoom to..."
   B. Or, use the magnifying tool and drag a box around the TP

Printing a Sanborn Map From the Electonic File

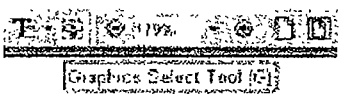
- EDR recommends printing images at 300 dpi (300 dpi prints faster than 600 dpi)
- To print only the TP area, cut and paste from Acrobat to your word processor application.

Acrobat Versions 6 and 7



1. Go to the menu bar
2. Click the "Select Tool"
3. Draw a box around the area selected
4. "Right click" on your mouse
5. Select "Copy Image to Clipboard"
6. Go to Word Processor such as Microsoft Word, paste and print.

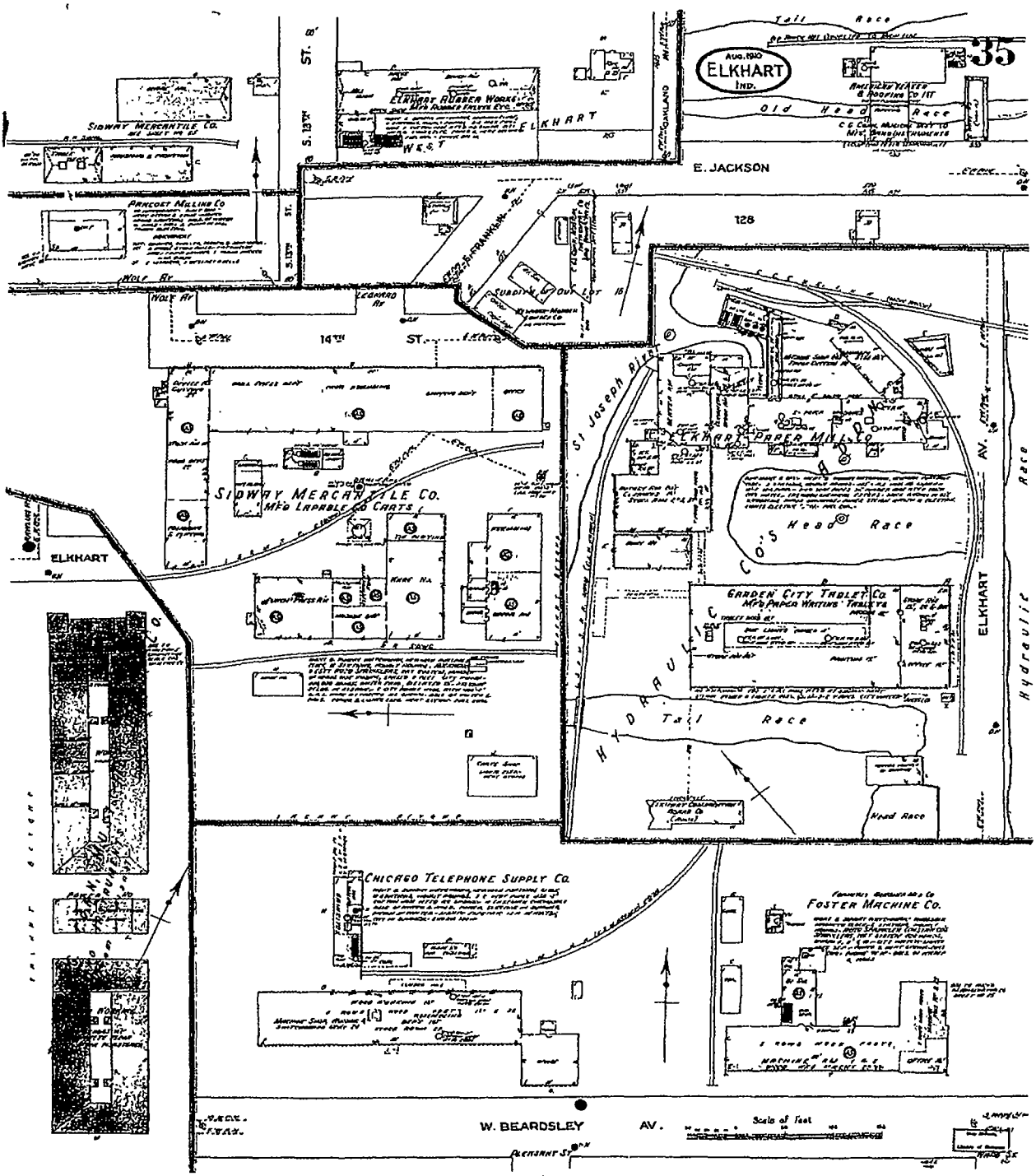
Acrobat Version 5



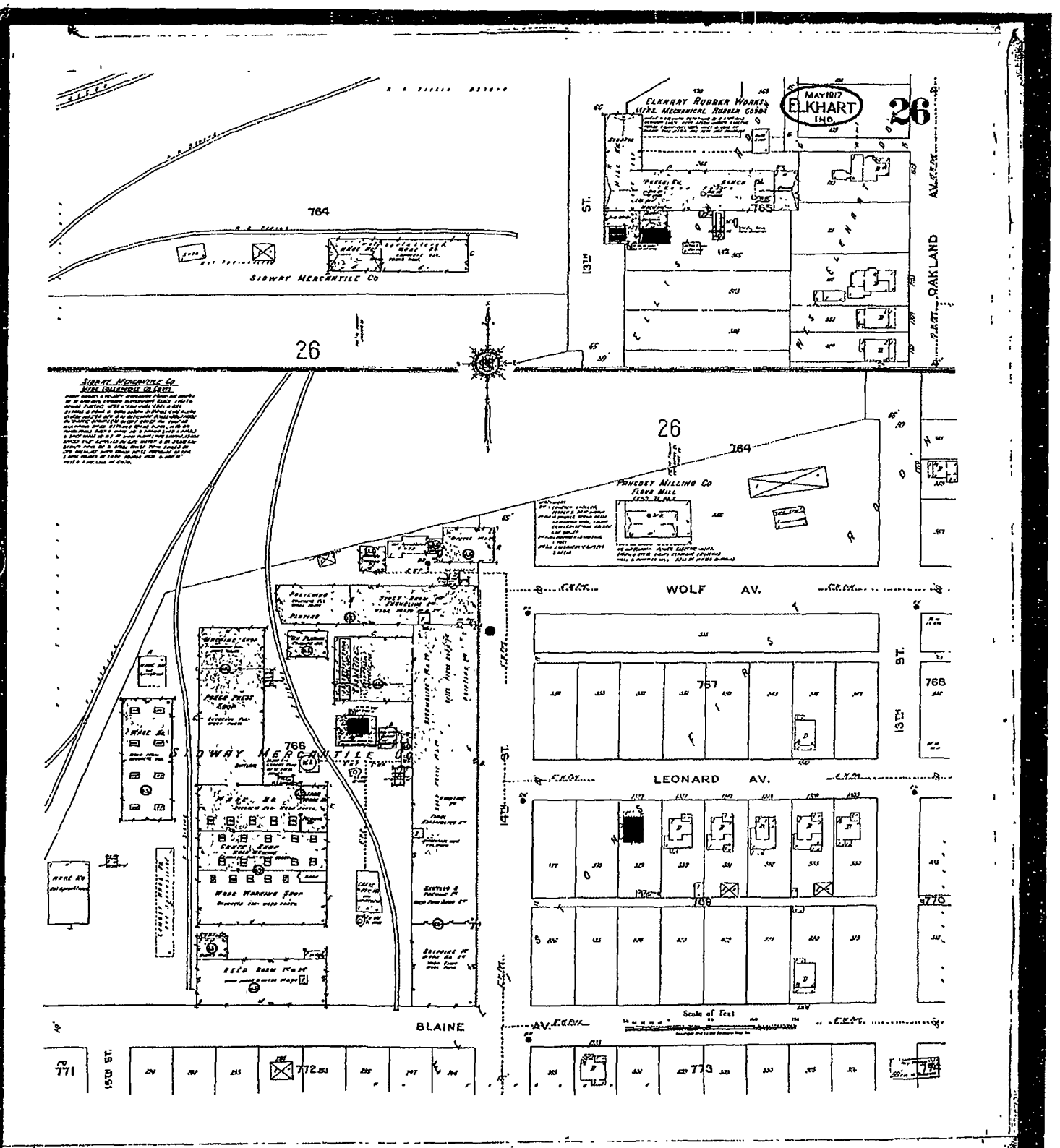
1. Go to the menu bar
2. Click the "Graphics Select Tool"
3. Draw a box around the area selected
4. Go to "Menu"
5. Highlight "Edit"
6. Highlight "Copy"
7. Go to Word Processor such as Microsoft Word, paste and print.

Important Information about Email Delivery of Electronic Sanborn Map Images

- Images are grouped intro one file, up to 2MB.
- In cases where in excess of 6-7 map years are available, the file size typically exceeds 2MB. In these cases, you will receive multiple files, labeled as "1 of 3", "2 of 3", etc. including all available map years.
- Due to file size limitations, certain ISPs, including AOL, may occasionally delay or decline to deliver files. Please contact your ISP to identify their specific file size limitations.



The Sanborn Library, LLC
Copyright© 1910 The Sanborn Library LLC MAP
Year LOT Research Assistant



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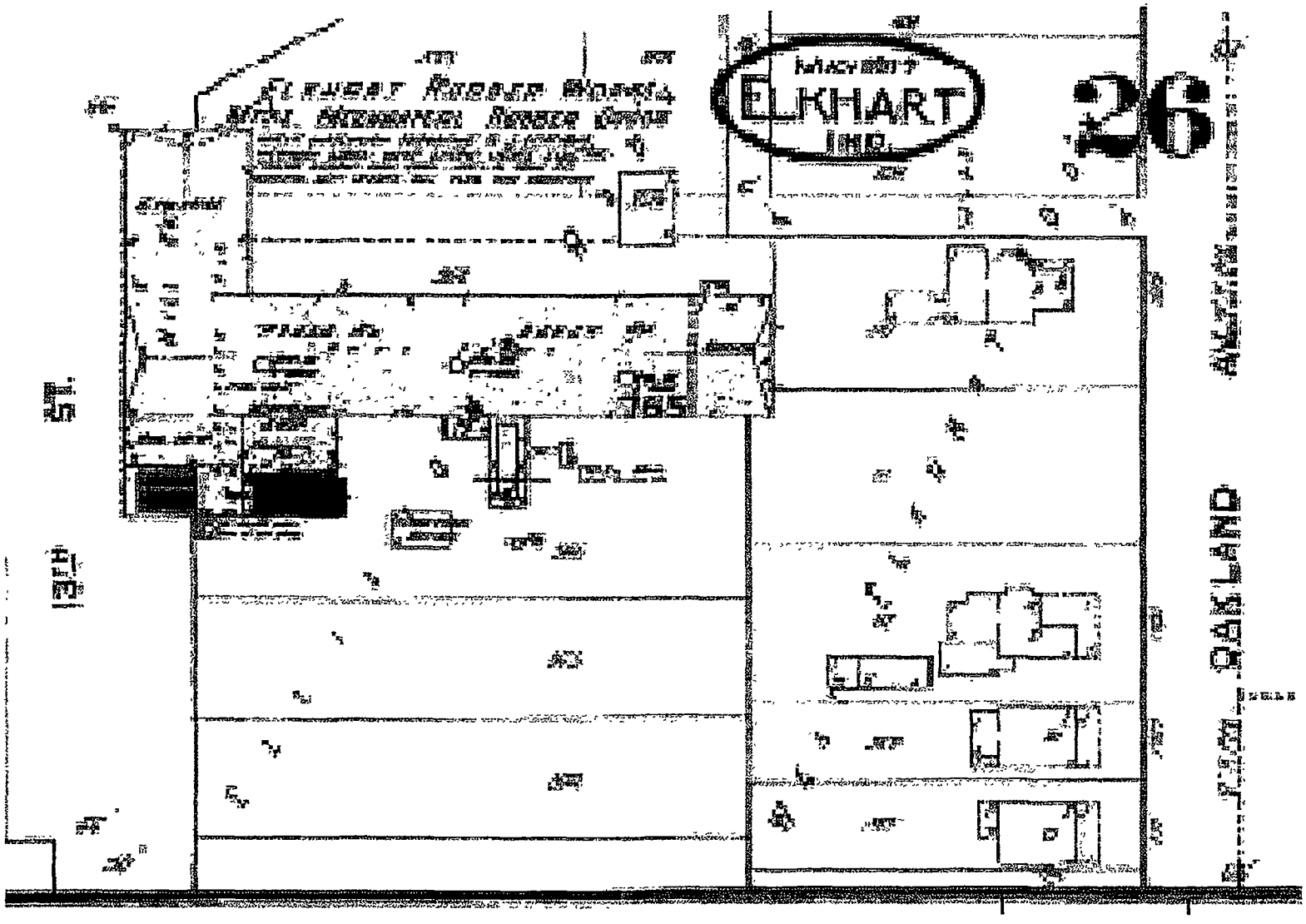
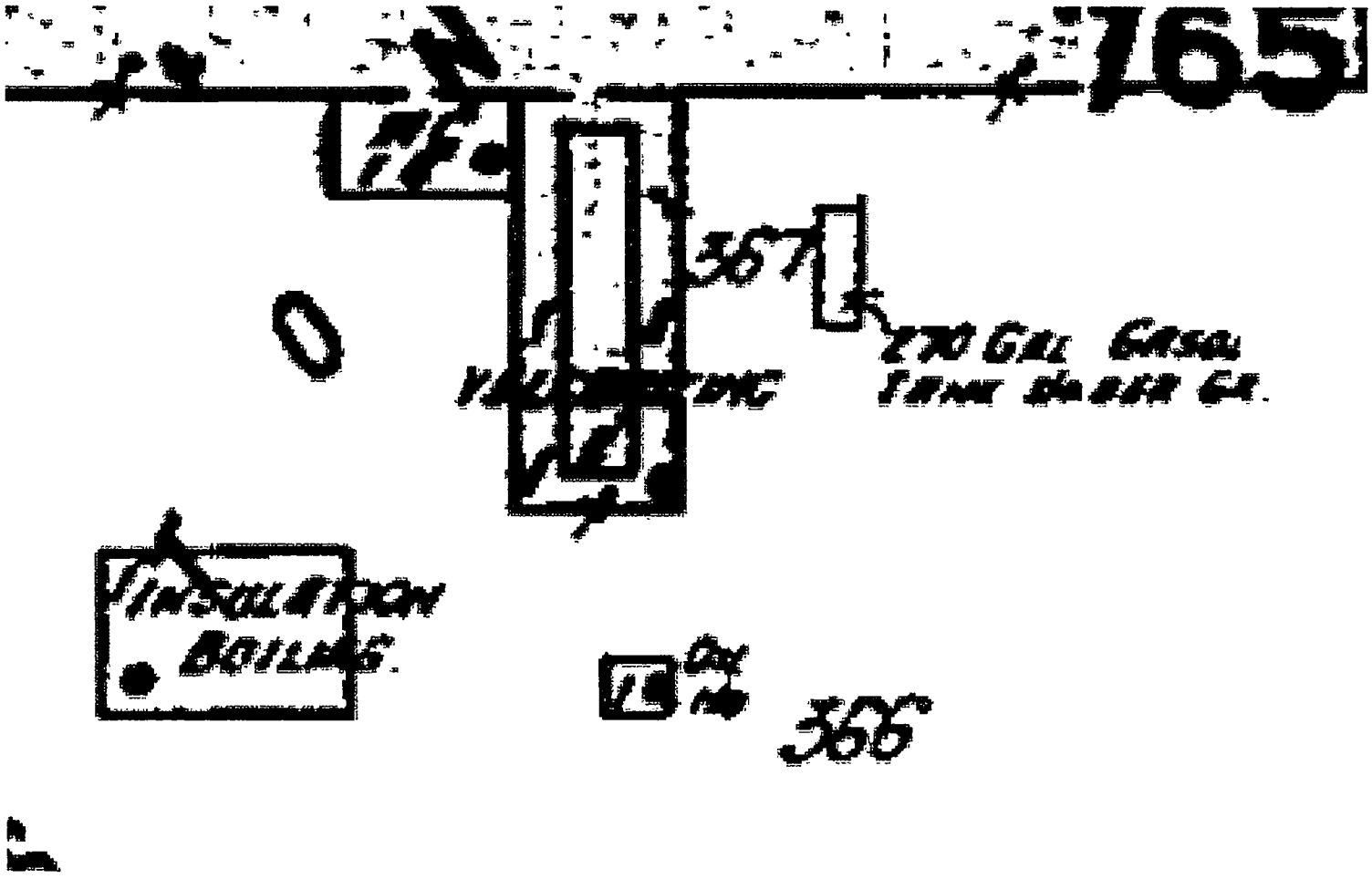
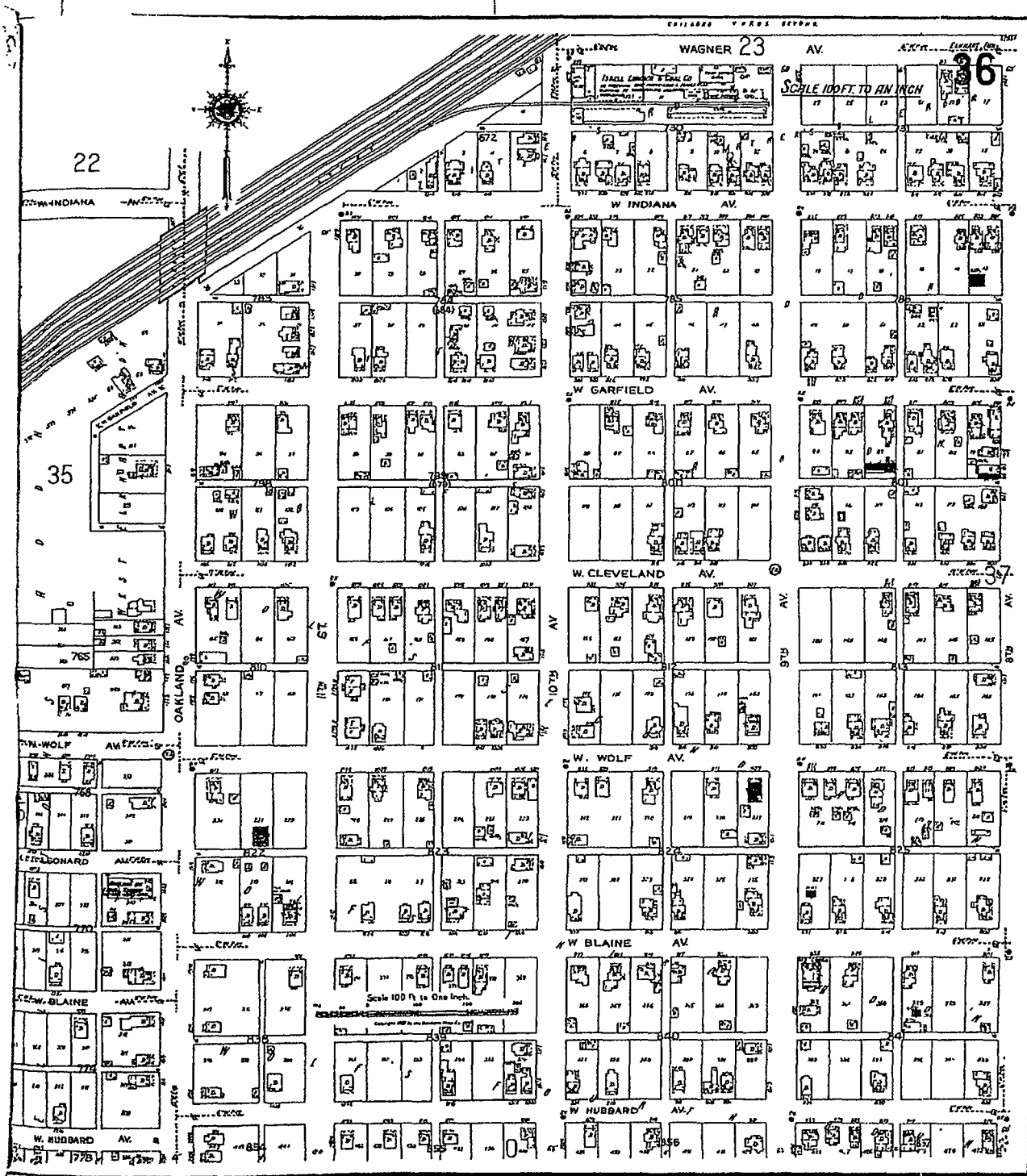


1917 Sanborn - Site



1917 Sanborn – Site Specific



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Yes CDR Research Associate

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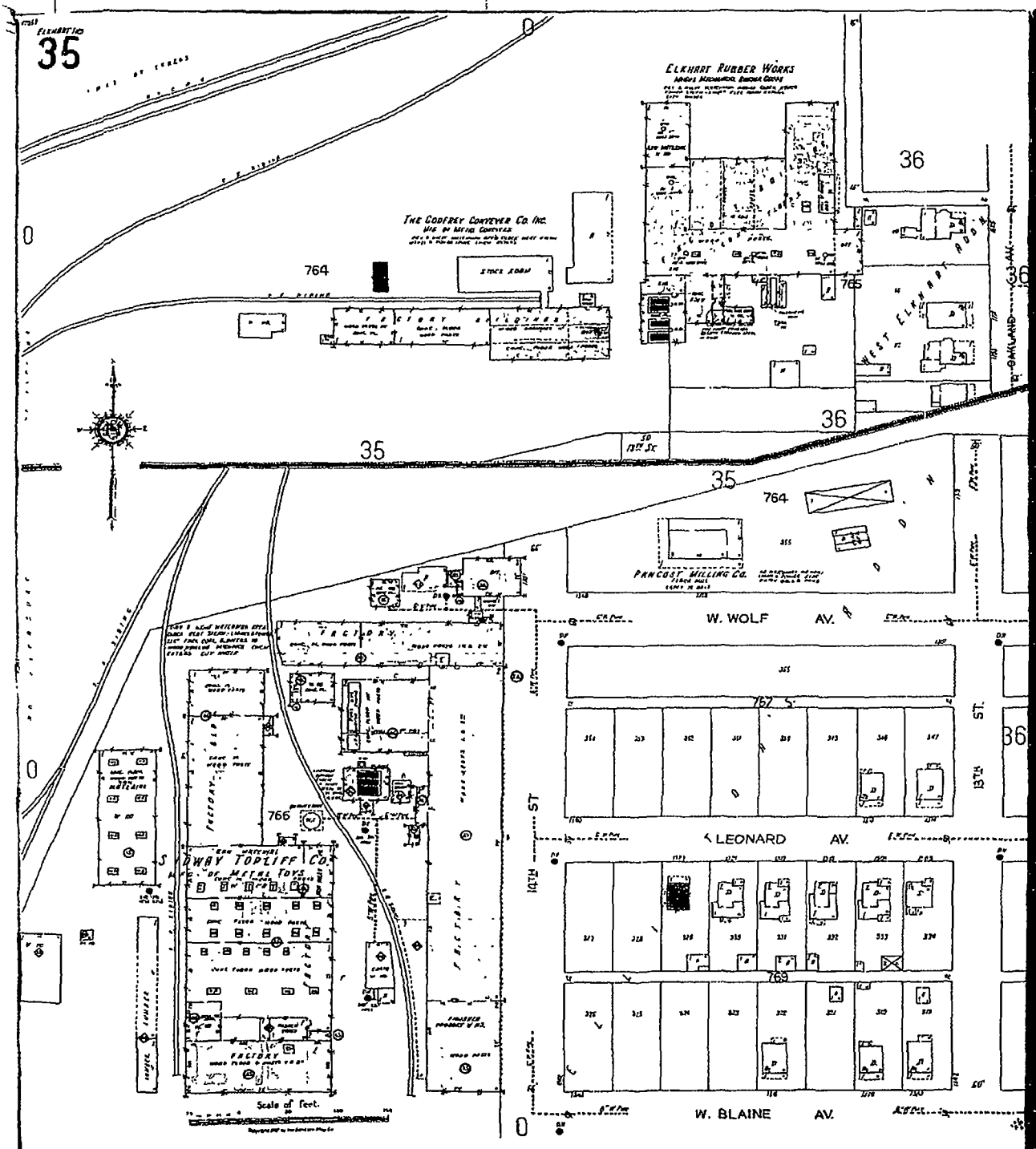

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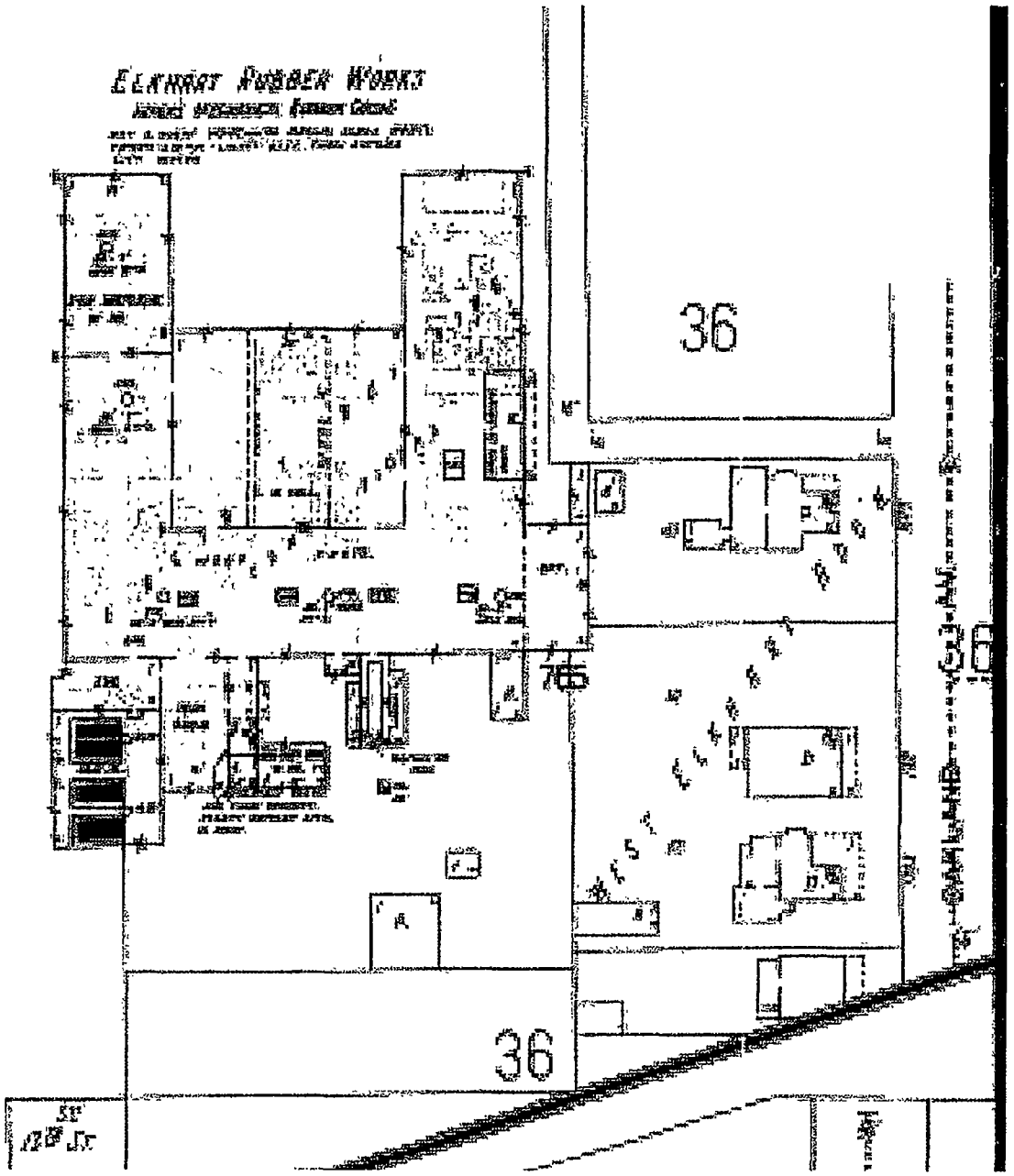
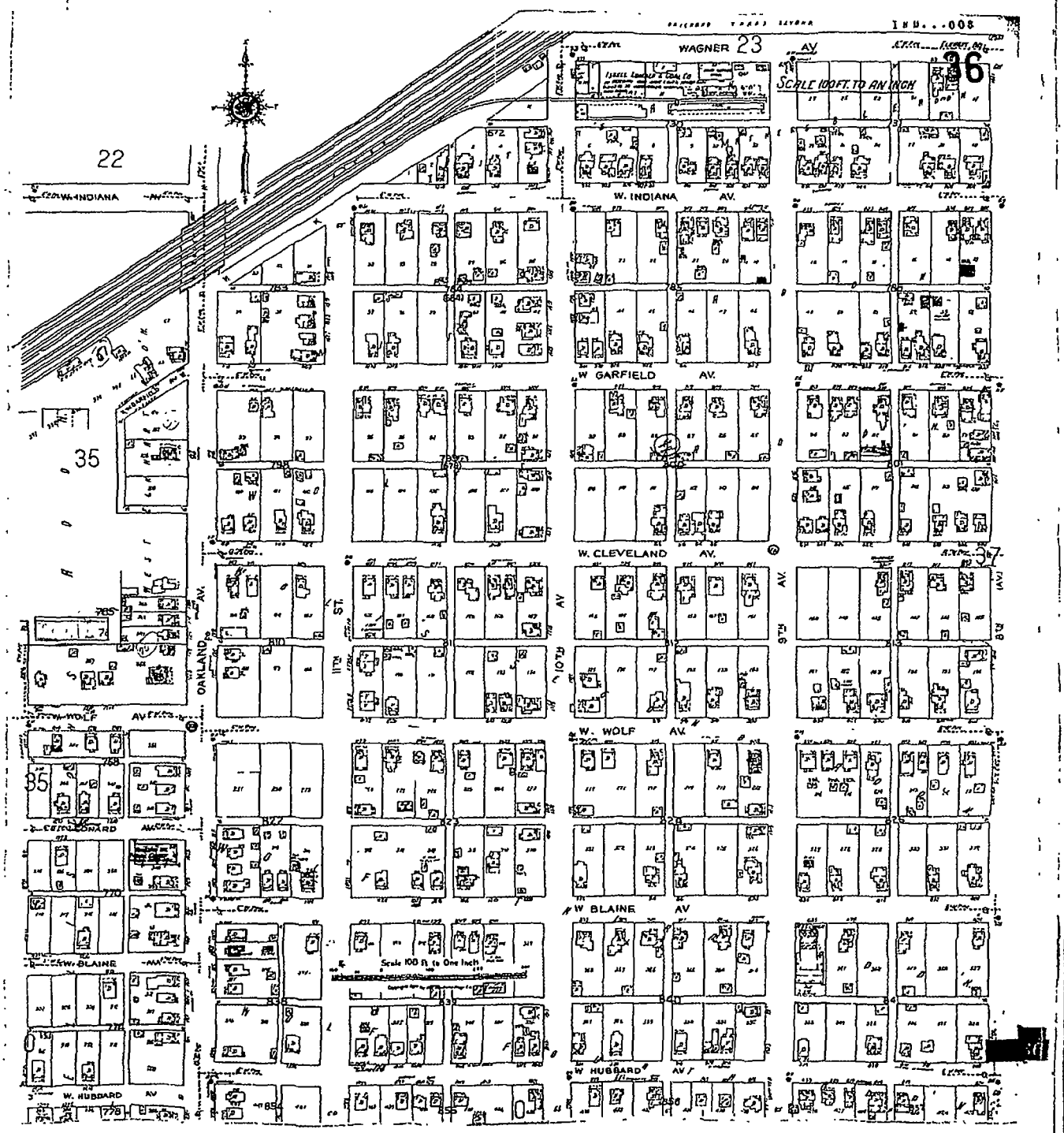
Year



1927 Sanborn - Site



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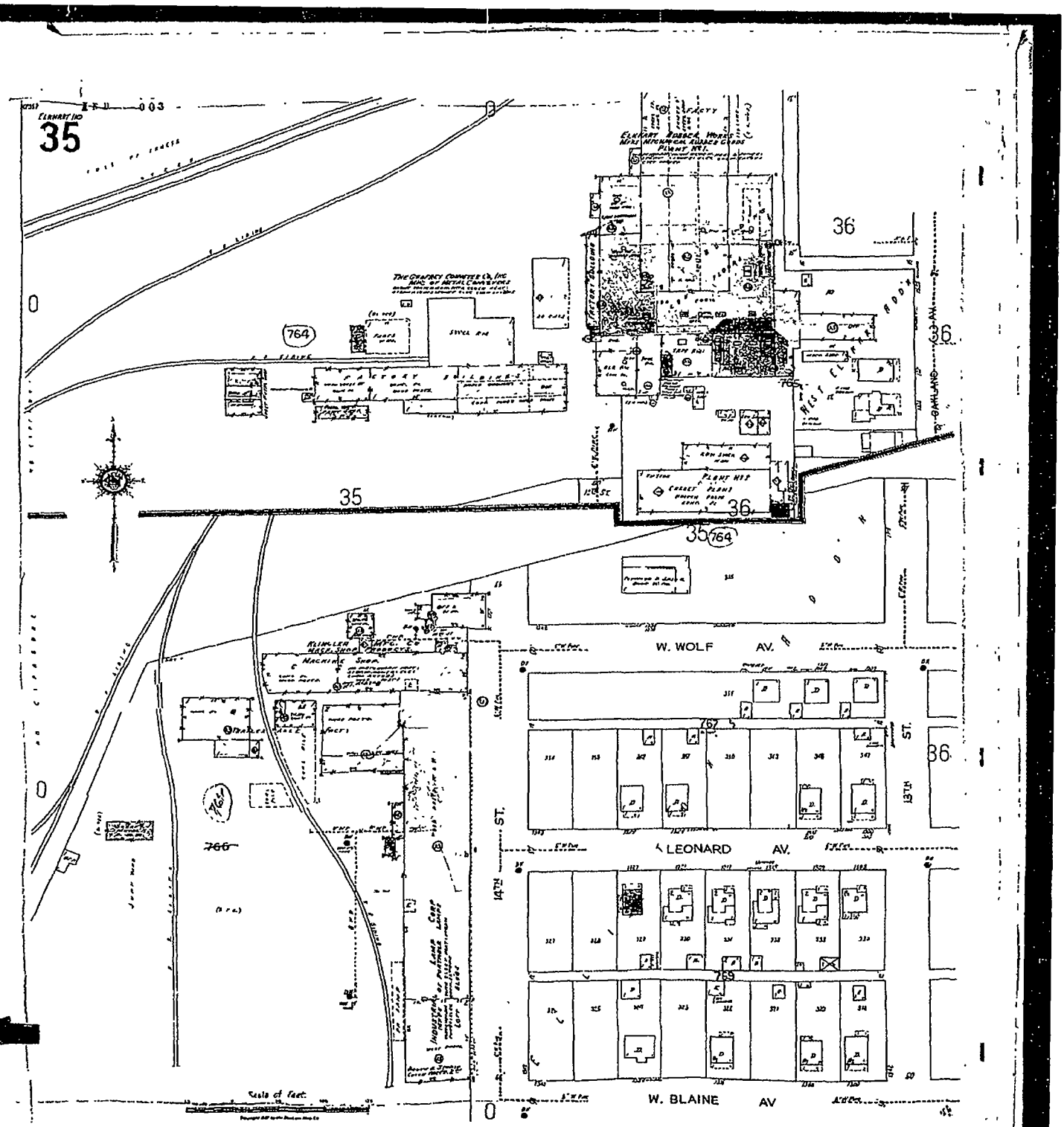

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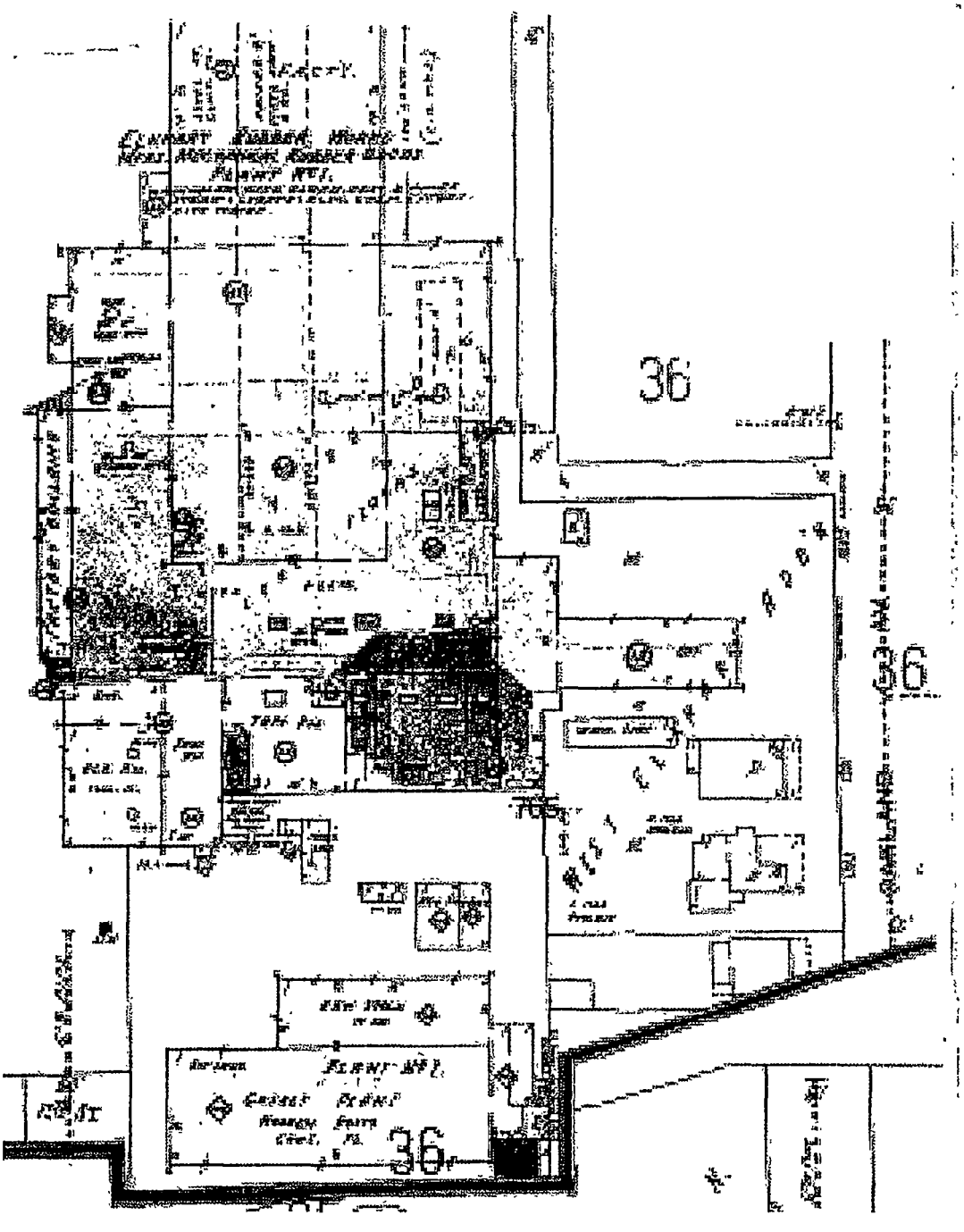
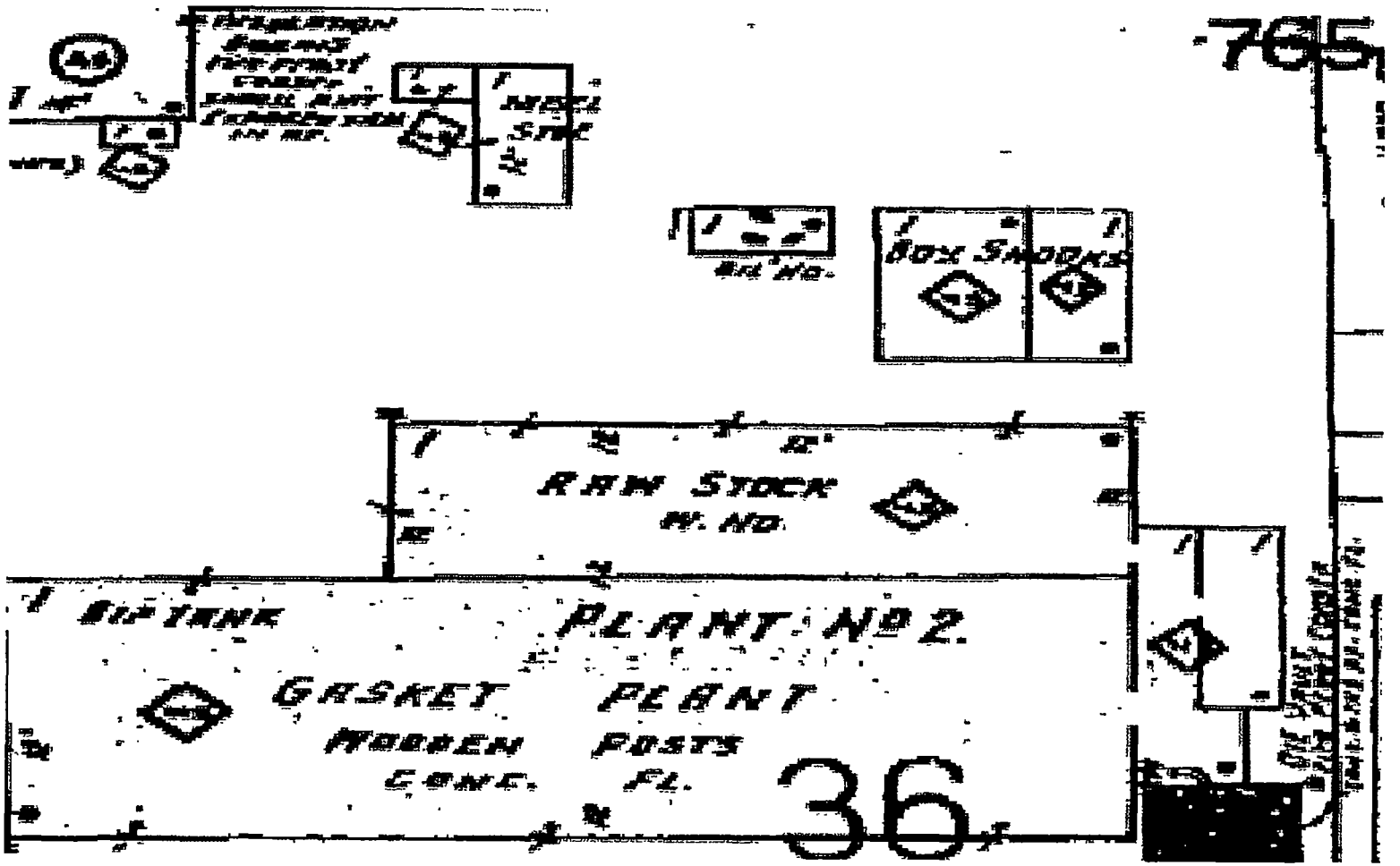
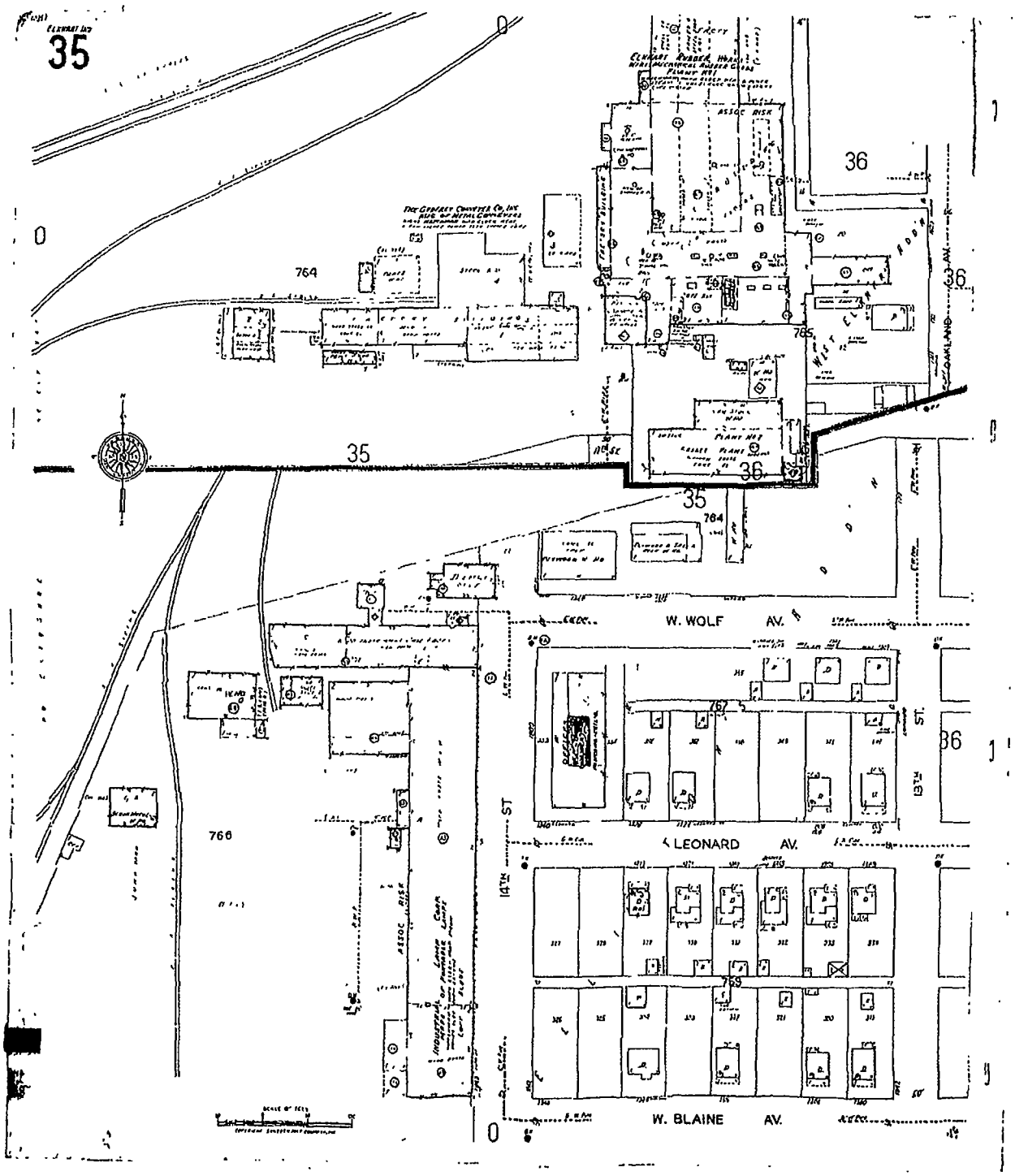


1950 Sanborn - Site



1950 Sanborn – Lower Plant



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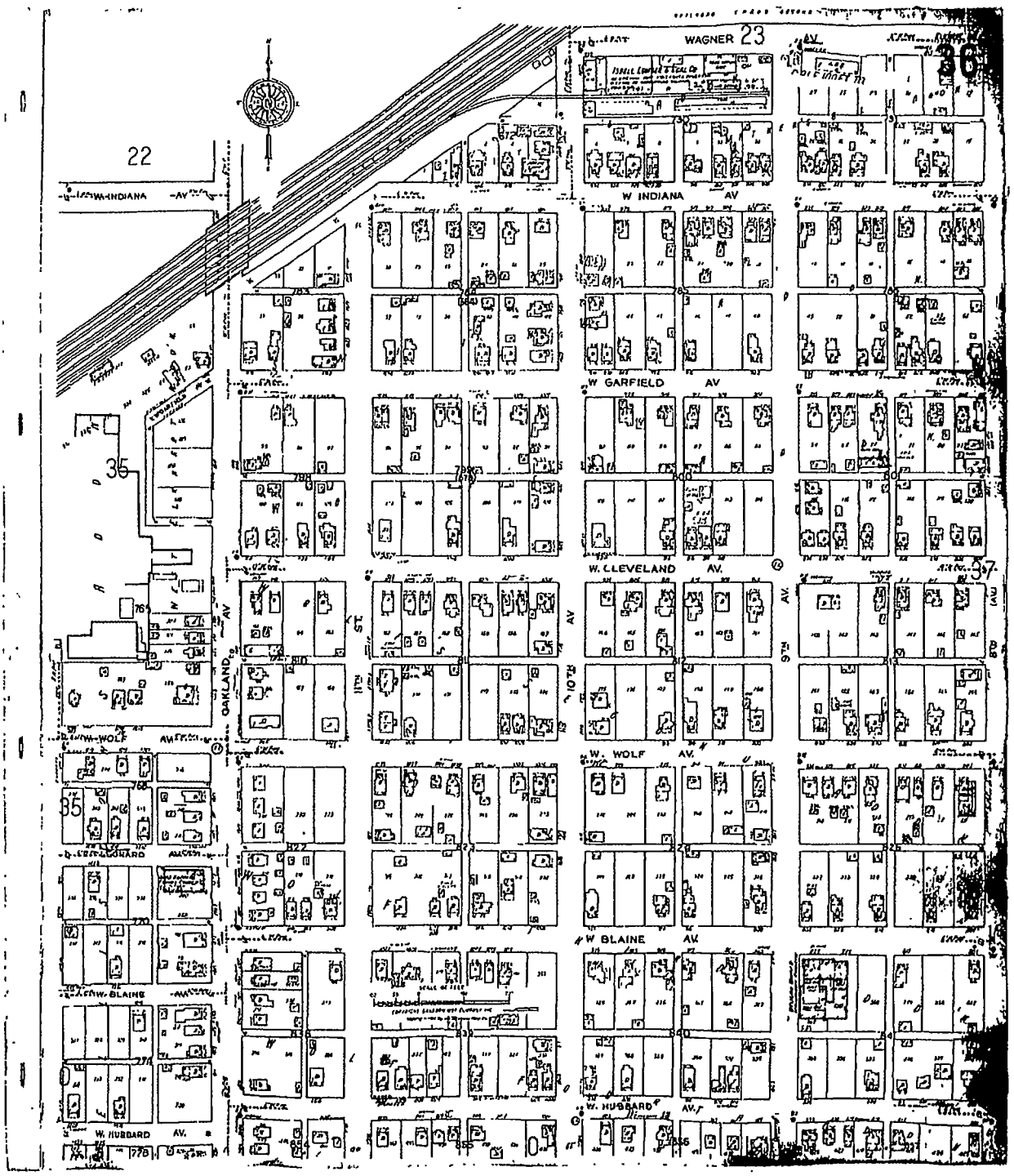
Year Edit Reference Associate



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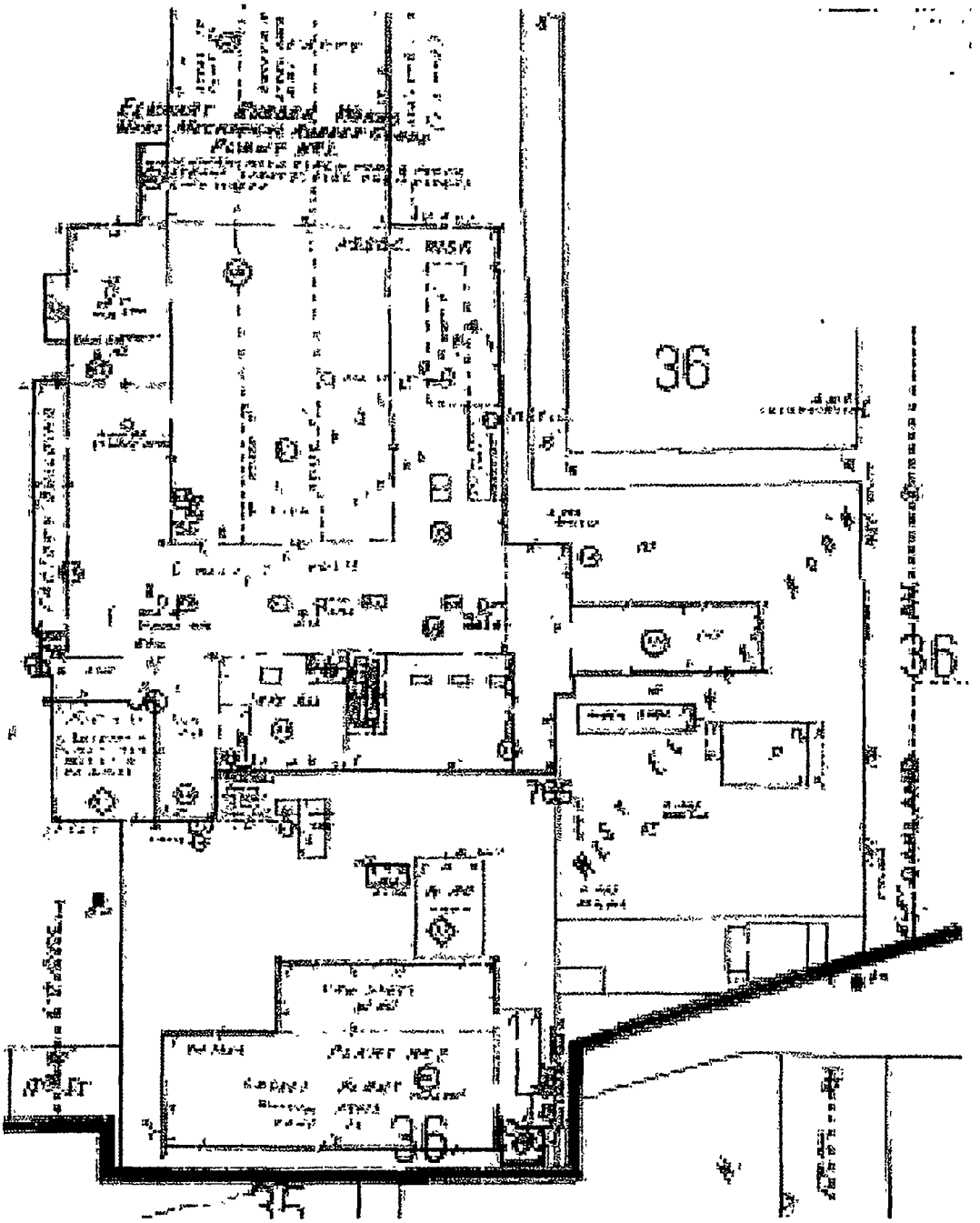
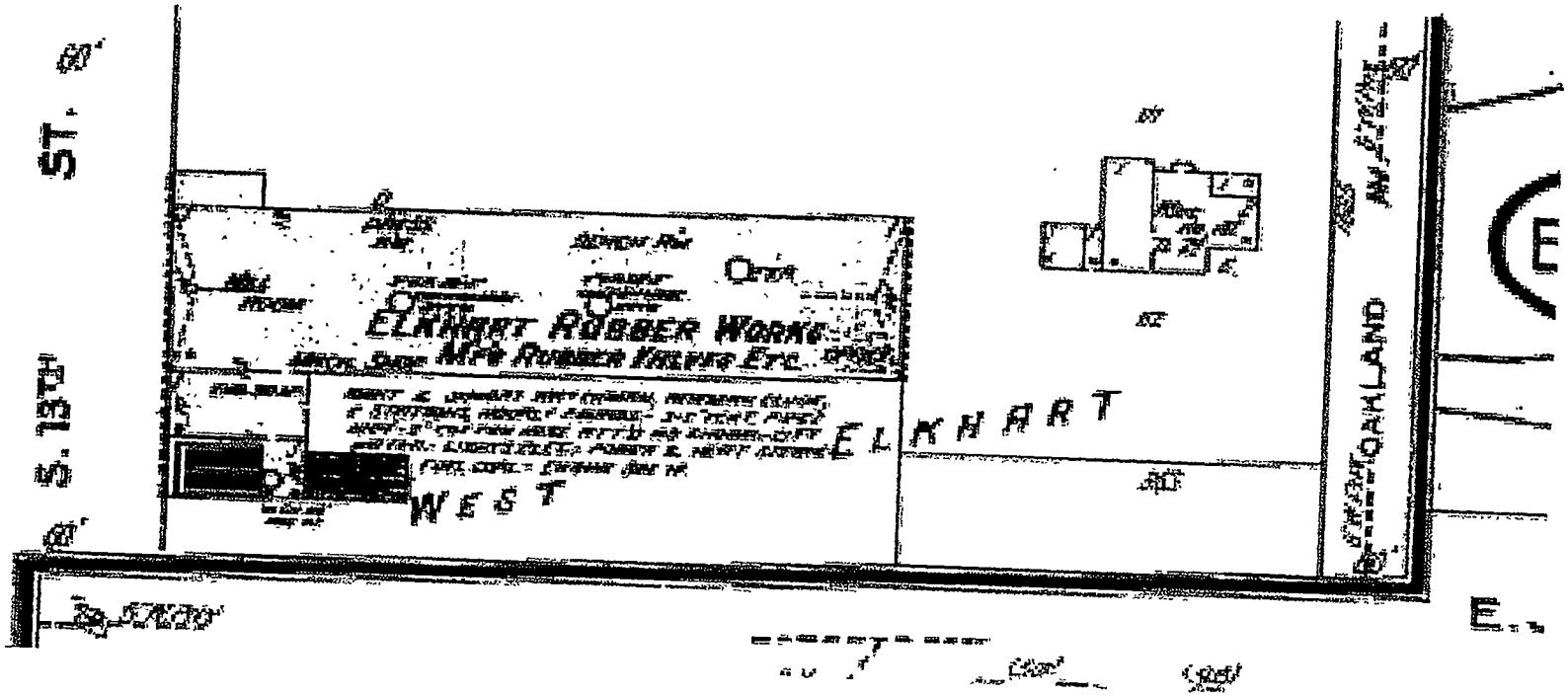


1968 Sanborn - Site



1910 Sanborn - Site

EDR™ Environmental
Data Resources Inc

The EDR-City Directory
Abstract

Sturgin Iron and Metal
1631 Oakland Avenue
Elkhart, IN 46516

February 02, 2005

Inquiry Number: 1351823-7

The Standard In Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06460

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 2, 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 1527-00 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 1527-00, Section 7.3.2.1, page 12.)*

NAICS (North American Industry Classification System) Codes
NAICS is a unique, all-new system for classifying business establishments. Adopted in 1997 to replace the prior Standard Industry Classification (SIC) system, it is the system used by the statistical agencies of the United States. It is the first economic classification system to be constructed based on a single economic concept. To learn more about the background, the development and difference between NAICS and SIC, visit the following Census website: http://www.census.gov/epcd/www/naicsdev.htm.

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

- ***City Directories:***

Business directories including city, cross reference and telephone directories were reviewed, if available, at approximately five year intervals for the years spanning 1945 through 2003. (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 02, 2005

Target Property:
1631 Oakland Avenue
Elkhart, IN 46516

PUR ID Year	*Uses*	*NAICS*	*Source*
-- 1945	Address not Listed in Research Source	N/A	Polk City Directory
-- 1959	Address not Listed in Research Source	N/A	Polk City Directory
-- 1964	Address not Listed in Research Source	N/A	Polk City Directory
-- 1969	Address not Listed in Research Source	N/A	Polk City Directory
-- 1974	Address not Listed in Research Source	N/A	Polk City Directory
-- 1979	Address not Listed in Research Source	N/A	Polk City Directory
-- 1983	Address not Listed in Research Source	N/A	Polk City Directory
-- 1988	Draggoo Electric Co		Polk City Directory
-- 1993	Draggoo Group Inc		Polk City Directory
-- 1998	Anew Company		Polk City Directory
-- 2003	Anewco		Polk City Directory

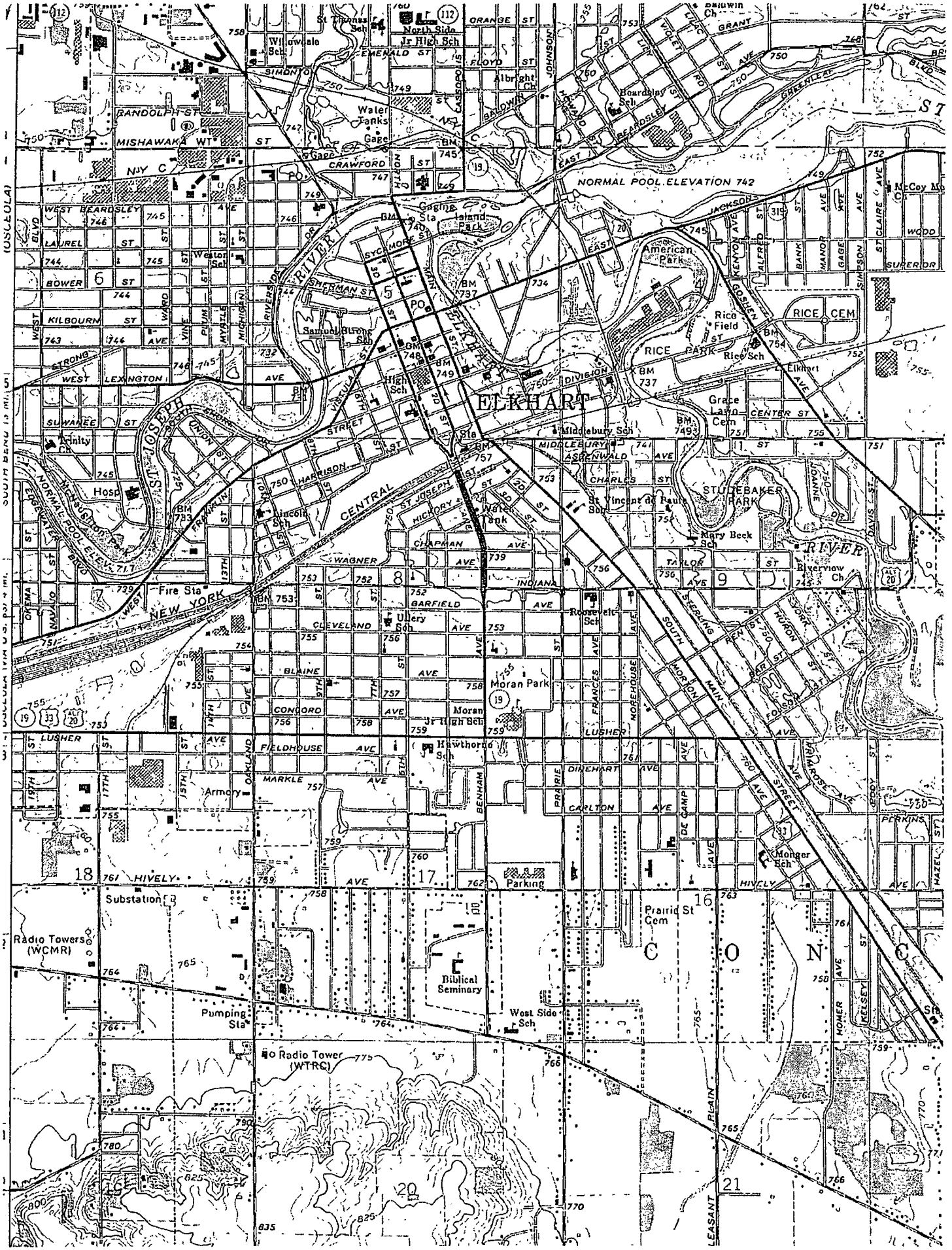
Adjoining Properties

SURROUNDING
Multiple Addresses
Elkhart, IN 46516

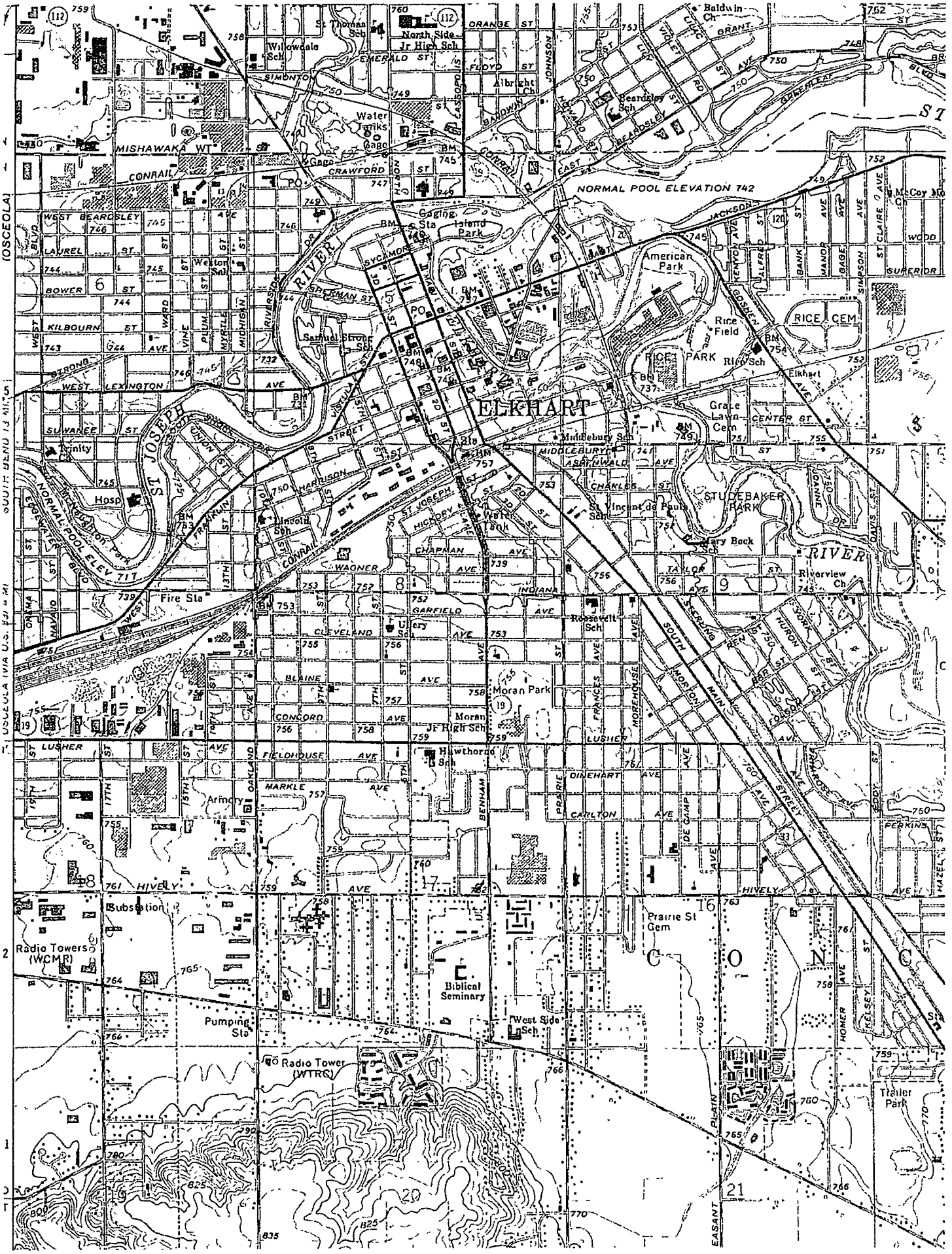
PUR ID Year	*Uses*	*NAICS*	*Source*
1945	**OAKLAND AVE**		Polk City Directory
	Vacant (1613)	N/A	
	Residence (1614)		
	Address not listed in research source (1629)	N/A	
	Residence (1701)		
	Residence (1703)		
	Residence (1707)		
	Residence (1711)		
	Abbott's Grocery (1712)		
	Residence (1715)		
1959	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		

PUR ID Year	Uses	NAICS	Source
1959 (continued)			
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Vacant (1703)	N/A	
	Residence (1707)		
	Residence (1711)		
	Oakland Avenue Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1964	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Residence (1707)		
	Residence (1711)		
	Nancy's Burger Store (1712)		
	Residence (1715)		
	-No other addresses within range		
1969	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Residence (1707)		
	Residence (1711)		
	Oakland Food Mart (1712)		
	Residence (1715)		
	-No other addresses within range		
1974	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1707)		
	Vacant (1711)	N/A	
	Rixter's Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1979	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Anchor Packing Co (1629)		

PUR ID Year	*Uses*	*NAICS*	*Source*
1979 (continued)			
	Residence (1707)		
	Oakland Market (1712)		
	Vacant (1715)	N/A	
	-No other addresses within range		
1983	**OAKLAND AVE**		Polk City Directory
	Vacant (1614)	N/A	
	Vacant (1629)	N/A	
	Residence (1707)		
	Rixter's Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1988	**OAKLAND AVE**		Polk City Directory
	Paul Wilhs, Trash Hauler (1614)		
	Residence (1707)		
	Rixter's Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1993	**OAKLAND AVE**		Polk City Directory
	Vacant (1614)	N/A	
	Vacant (1707)	N/A	
	Vacant (1712)	N/A	
	Vacant (1715)	N/A	
	-No other addresses within range		
1998	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		
	Residence (1707)		
	Address not listed in research source (1712)	N/A	
	Address not listed in research source (1715)	N/A	
	-No other addresses within range		
2003	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		
	Residence (1707)		
	Dave's Tax Svc (1712)		
	No Current Listing (1715)		
	-No other addresses within range		



ELKHART
NORMAL POOL ELEVATION 742
ST JOSEPH RIVER
NEW YORK CENTRAL
RICE PARK
RICE CEM
American Park
STUDEBAKER PARK
Moran Park
Moran Jr High Sch
Hawthorne Sch
Ullery Sch
Roosevelt Sch
Mary Beck Sch
Riverview Ch
Grace Lawn Cem
Rice Field
Rice Sch
Elkhart
Middlebury Sch
Samuel Strong Sch
High Sch
Lincoln Sch
Fire Sta
Hosp
Trinity Ch
Weston Sch
Water Tanks
Gage
Gaging Sta
Island Park
Albright Ch
Beardsley Sch
Willowdale Sch
North Side Jr High Sch
St Thomas Sch
Armory
Parking
Substation
Radio Towers (WCMR)
Pumping Sta
Radio Tower (WTRC)
Biblical Seminary
West Side Sch
Prairie St Cem
Monger Sch
C O N C


ELKHART
RIVER
NORMAL POOL ELEVATION 742
NORMAL POOL ELEV 717
MISHAWAKA WT
CONRAIL
Water Tanks
Gage
Gaging Sta
Island Park
American Park
Rice Field
RICE PARK
RICE CEM
Rice Sch
Grace Lawn Cem
Middlebury Sch
STUDEBAKER PARK
St Vincent de Paul Sch
Mary Beck Sch
Riverview Ch
Roosevelt Sch
Moran Park
Moran JF High Sch
Hawthorne Sch
Armory
Fire Sta
Hosp
Lincoln Sch
Trinity
Weston Sch
Samuel Brown Sch
Albright Ch
Beardsley Sch
Willowdale Sch
St Thomas Sch
North Side Jr High Sch
Baldwin Ch
Prairie St Cem
Biblical Seminary
West Side Sch
Pumping Sta
Radio Towers (WCMR)
Radio Tower (WTRC)
Substation
Trailer Park
Elkhart
Grant
Violet
Floyd
Simonton
Emerald
Crawford
Jackson
Sycamore
Main
Harrison
Franklin
Indiana
Cleveland
Garfield
Blaine
Concord
Lusher
Hively
Markle
Fieldhouse
Dinehart
Carlton
Chapman
Wagner
Taylor
Huron
Perkins
Hazel
Plain
Easant
Prairie
Benham
Oakland
Frances
Morehouse
Lexington
Kilbourn
Bower
Laurel
Strong
Suwanee
Orkma
Navajo
Michigan
Myrtle
Vine
Plum
Ward
Union
Division
Nappanee
Elkhart
Jackson
Goshen
Simpson
Claire
Wood
Superior
Manor
Bank
Alfred
Kenyon
Gage
Lafayette
Charles
Middlebury
Ash
Oakwald
Davis
Johnson
Howard
Cassopolis
Baldwin
Conrail
Michigan Division
Michigan Div Conrail
Michigan Div Conrail Yard
Edgewater
Boulevard
Island
Water Tank
Gage
Sta
Sch
Ch
Cem
Hosp
Sub
Jr
Hi
Ave
St
Blvd
Dr
Pl
Ct
Rd
Pk
Yard
Tank
Tower
Towers
Pumping
Seminary
Substation
Trailer
Park
Armory
Fire
Gaging
Water
Tanks
Prairie
Biblical
West Side
Radio
Towers
Tower
(WCMR)
(WTRC)
(OSCEOLA)
SOUTH BEND 13 MI
OSCEOLA (VIA U.S. 33) 4 MI
T 37 N
R 2 E
R 3 E
R 4 E
R 5 E
R 6 E
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ELKHART
NORMAL POOL ELEVATION 742
ST JOSEPH RIVER
Island Park
American Park
RICE PARK
Rice Field
RICE CEM
Rice Sch
Grace Lawn Cem
STUDEBAKER PARK
Willowdale Sch
St Thomas Sch
North Side Jr High Sch
Albright Ch
Beardsley Sch
Water Tanks
Gage
Gaging Sta
Weston Sch
Samuel Strong Sch
PO
Sta
Trinity Ch
Hosp
McNaughton Park
NORMAL POOL ELEV 717
Lincoln Sch
Middlebury Sch
St Vincent de Paula Sch
Mary Beck Sch
Fire Sta
Roosevelt Sch
Ulery Sch
Moran Park
Moran Jr High Sch
Hawthorne Sch
Armory
Substation
Prairie St Cem
Biblical Seminary
West Side Sch
Pumping Sta
Radio Tower (WTRC)
MISHAWAKA
CRAWFORD ST
WEST BEARDSLEY AVE
LAUREL ST
BOWER ST
KILBOURN ST
STRONG AVE
WEST LEXINGTON AVE
SUWANEE ST
HARRISON ST
WAGNER AVE
CHAPMAN AVE
INDIANA AVE
GARFIELD AVE
CLEVELAND AVE
BLAINE AVE
CONCORD AVE
LUSHER AVE
FIELDHOUSE AVE
MARKLE AVE
DINEHART AVE
CARLTON AVE
HIVELY AVE
MIDDLEBURY ST
ASPENWALD AVE
CHARLES ST
TAYLOR ST
CENTER ST
JACKSON
SUPERIOR DR
WOOD
ORANGE ST
GRANT
EMERALD ST
SIMONTON
FLOYD
BAUGO
BENHAM AVE
OAKLAND
PRAIRIE
FRANCES AVE
MOREHOUSE
DE CAMP
SOUTH MAIN STREET
MORTON
PRAIRIE
GOSHEN AVE
PARK
PERKINS
HOMER
KELSEY
C O N C

The EDR Aerial Photo Decade Package

Sturgin Iron and Metal
1631 Oakland Avenue
Elkhart, IN 46516

February 1, 2005

Inquiry Number: 1351823.5

RECEIVED
FEB 04 2005
ERM

The Source For Environmental Risk Management Data

440 Wheelers Farms Rd
Milford, Connecticut 06460

Nationwide Customer Service

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

THE EDR AERIAL PHOTO DECADE PACKAGE

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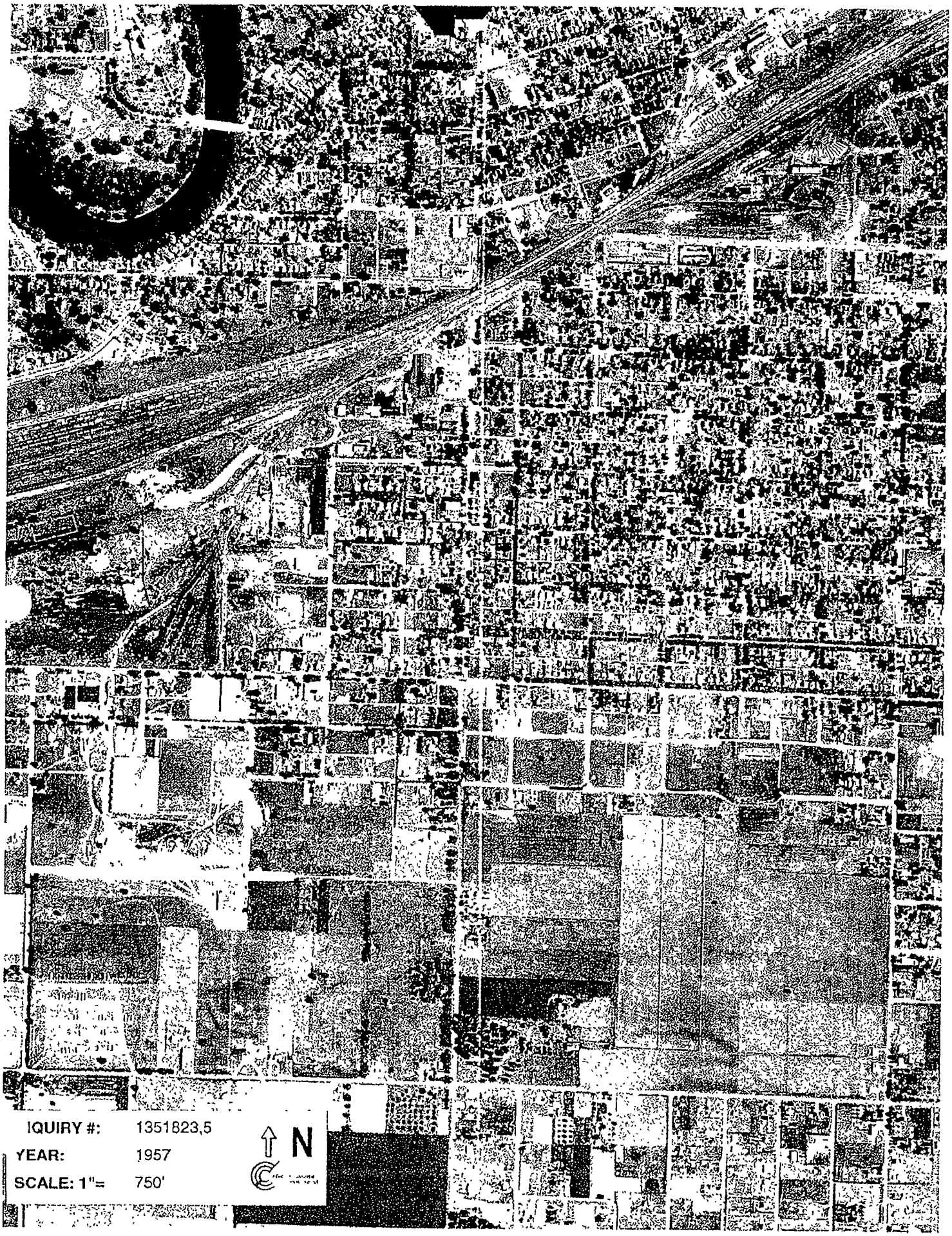
Date EDR Searched Historical Sources:
Aerial Photography February 01, 2005

Target Property:
1631 Oakland Avenue
Elkhart, IN 46516

PUR ID *Year*	*Uses*	*Portion-Findings (FIM Information Only)*	*Source*
1 1957	Aerial Photograph Scale: 1"=750'	Panel #: 2441085-F8/FlightDate: June 3, 1957	nat
2 1965	Aerial Photograph Scale: 1"=750'	Panel #: 2441085-F8/FlightDate: August 20, 1965	nat
3 1973	Aerial Photograph Scale: 1"=750'	Panel #: 2441085-F8/FlightDate: July 13, 1973	nat
4 1987	Aerial Photograph Scale: 1"=833'	Panel #: 2441085-F8/FlightDate: July 17, 1987	nat
5 1992	Aerial Photograph Scale: 1"=833'	Panel #: 2441085-F8/FlightDate: April 5, 1992	nat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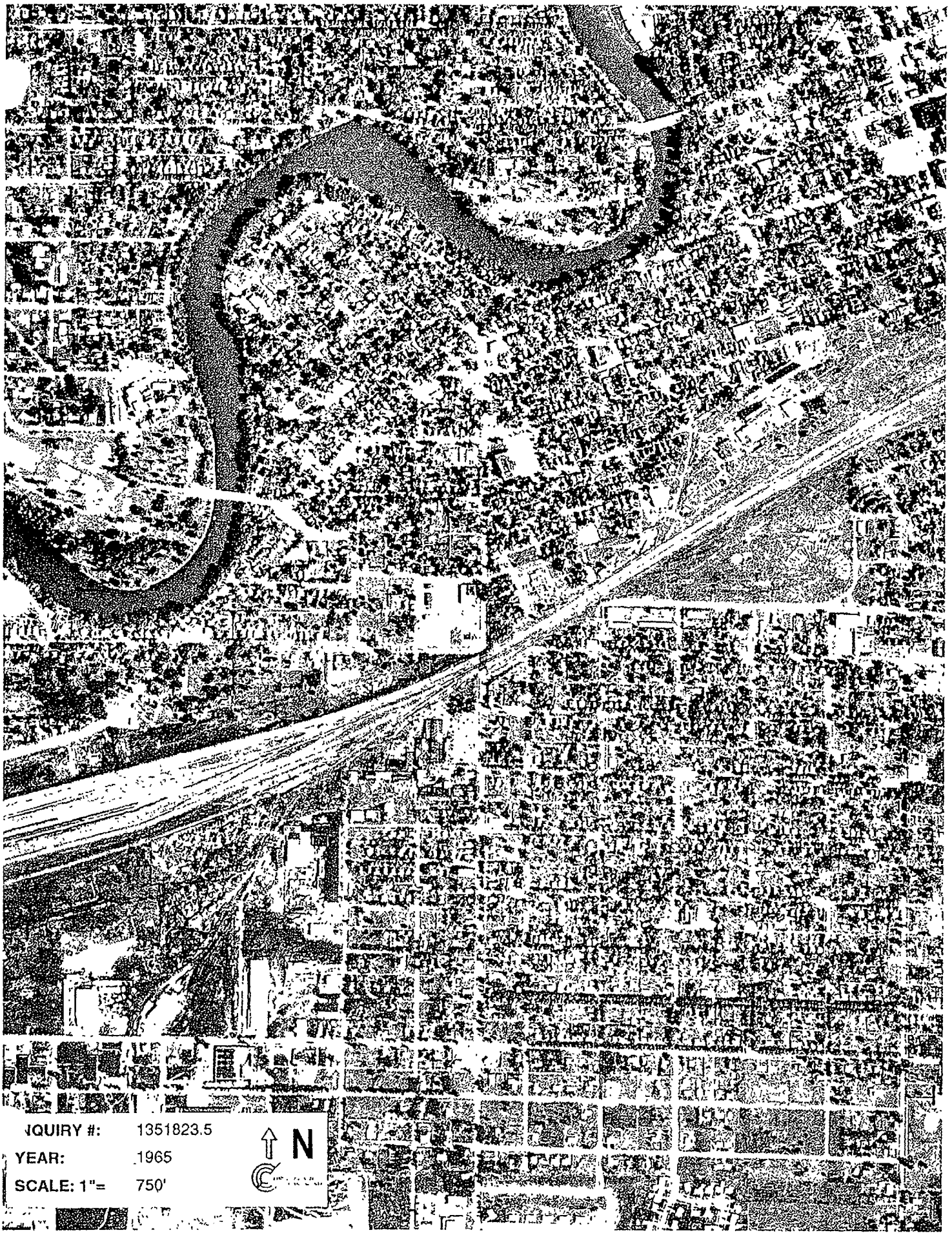
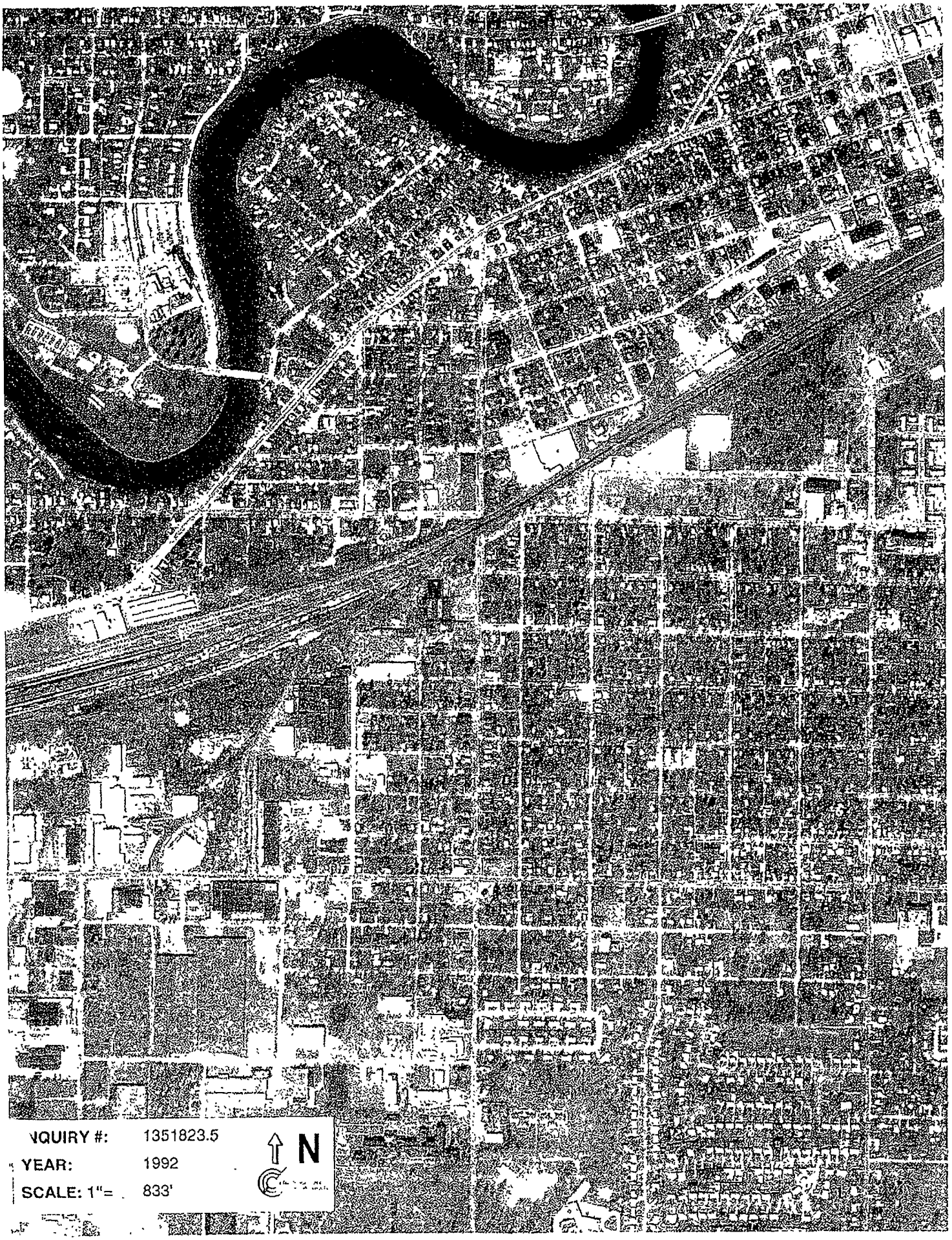
YEAR: 1957
SCALE: 1"= 750'
N


NQUIRY #: 1351823.5
YEAR: 1965
SCALE: 1"= 750'
N

IQUIRY #: 1351823.5
YEAR: 1973
SCALE: 1"= 750'
N

IQUIRY #: 1351823.5
YEAR: 1987
SCALE: 1"= 833'
N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YEAR: 1992
SCALE: 1"= 833'
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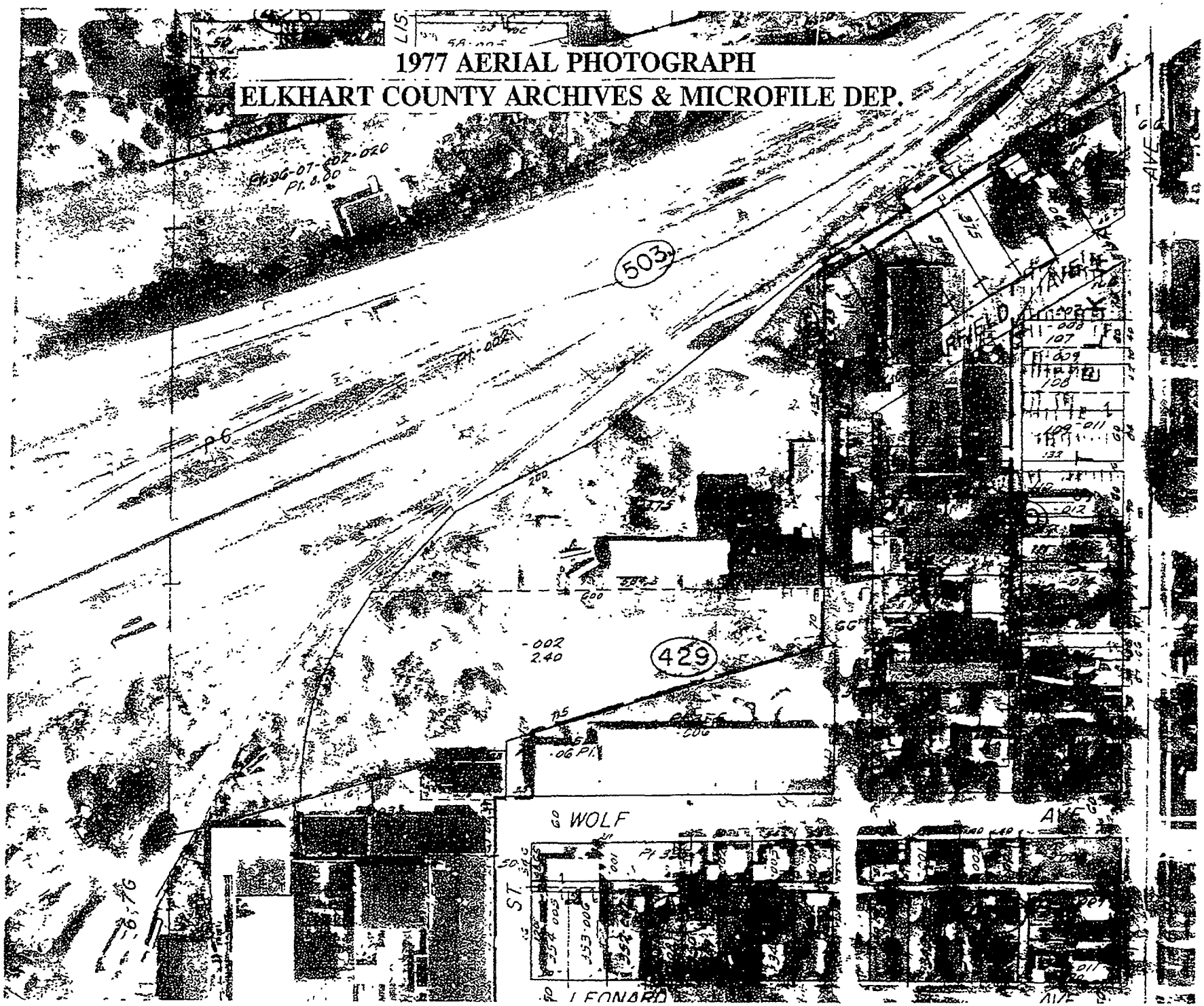
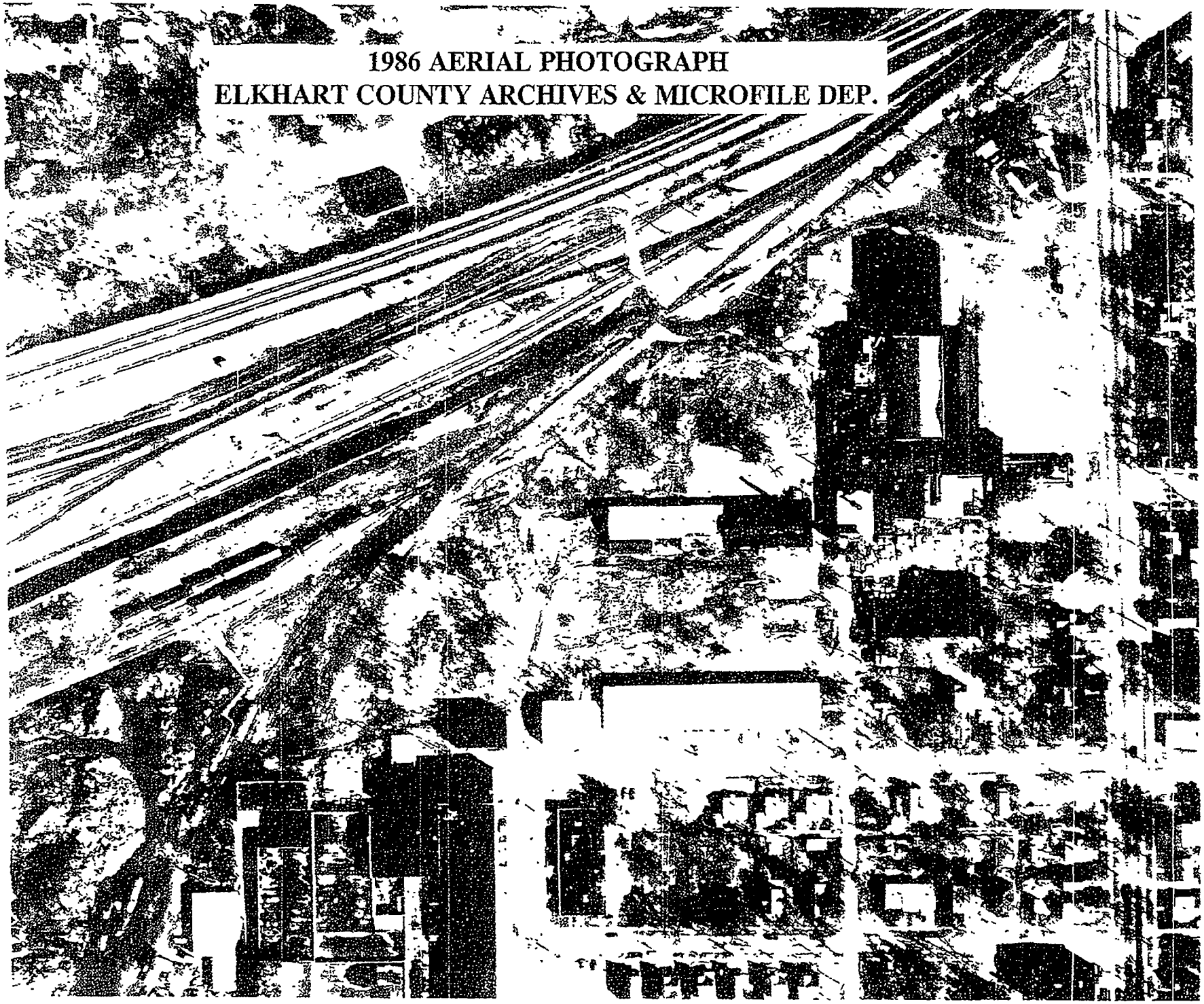

1977 AERIAL PHOTOGRAPH
ELKHART COUNTY ARCHIVES & MICROFILE DEP.
503
429
WOLF
ST
LEONARD
AVE


1986 AERIAL PHOTOGRAPH
ELKHART COUNTY ARCHIVES & MICROFILE DEP.

USGS

Appendix D
EDR Database Search Results

EDR™ Environmental
Data Resources Inc

The EDR Radius Map
with GeoCheck®

Sturgin Iron and Metal
1631 Oakland Avenue
Elkhart, IN 46516

Inquiry Number: 01351823.2r

January 31, 2005

The Standard in Environmental Risk Management Information

440 Wheelers Farms Road
Milford, Connecticut 06460

Nationwide Customer Service

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

FORM DPH

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GEOCHECK ADDENDUM

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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

1631 OAKLAND AVENUE
ELKHART, IN 46516

COORDINATES

Latitude (North):	41.672600 - 41° 40' 21.4"
Longitude (West):	85.985300 - 85° 59' 7.1"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	584467 2
UTM Y (Meters).	4613710.5
Elevation:	750 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property:	41085-F8 ELKHART, IN
Source:	USGS 7 5 min quad index

TARGET PROPERTY SEARCH RESULTS

The target property was not listed in any of the databases searched by EDR.

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

Proposed NPL..... Proposed National Priority List Sites
RCRA-LQG..... Resource Conservation and Recovery Act Information
ERNS..... Emergency Response Notification System

STATE ASTM STANDARD

SHWS..... List of Hazardous Waste Response Sites Scored Using the Indiana Scoring Model
SWF/LF..... Permitted Solid Waste Facilities
VCP..... Voluntary Remediation Program Site List

FEDERAL ASTM SUPPLEMENTAL

CONSENT..... Superfund (CERCLA) Consent Decrees

EXECUTIVE SUMMARY

Delisted NPL	National Priority List Deletions
FINDS	Facility Index System/Facility Identification Initiative Program Summary Report
HMIRS	Hazardous Materials Information Reporting System
MLTS	Material Licensing Tracking System
NPL Liens	Federal Superfund Liens
PADS	PCB Activity Database System
DOD	Department of Defense Sites
INDIAN RESERV	Indian Reservations
ODI	Open Dump Inventory
UMTRA	Uranium Mill Tailings Sites
FUDS	Formerly Used Defense Sites
RAATS	RCRA Administrative Action Tracking System
TRIS	Toxic Chemical Release Inventory System
TSCA	Toxic Substances Control Act
SSTS	Section 7 Tracking Systems
FTTS INSP	FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)

STATE OR LOCAL ASTM SUPPLEMENTAL

IN Spills	Spills Incidents
BULK	Registered Bulk Fertilizer and Pesticide Storage Facilities
DRYCLEANERS	Drycleaner Facility Listing

EDR PROPRIETARY HISTORICAL DATABASES

Coal Gas	Former Manufactured Gas (Coal Gas) Sites

BROWNFIELDS DATABASES

Brownfields	Brownfields Site List
AUL	Sites with Restrictions
VCP	Voluntary Remediation Program Site List

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

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

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

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

FEDERAL ASTM STANDARD

EXECUTIVE SUMMARY

NPL: Also known as Superfund, the National Priority List database is a subset of CERCLIS and identifies over 1,200 sites for priority cleanup under the Superfund program. The source of this database is the U.S. EPA.

A review of the NPL list, as provided by EDR, and dated 10/12/2004 has revealed that there is 1 NPL site within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CONRAIL RAIL YARD (ELKHART)	*SR 33*	*0 - 1/8*	*0*	*6*

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

A review of the CERCLIS list, as provided by EDR, and dated 08/10/2004 has revealed that there is 1 CERCLIS site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CONRAIL RAIL YARD (ELKHART)	*SR 33*	*0 - 1/8*	*0*	*6*

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 08/10/2004 has revealed that there is 1 CERC-NFRAP site within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
PATRICK METALS ELKHART	*1819 SOUTH 14TH STREET*	*1/8 - 1/4 SW*	*6*	*15*

CORRACTS: CORRACTS is a list of handlers with RCRA Corrective Action Activity. This report shows which nationally-defined corrective action core events have occurred for every handler that has had corrective action activity.

A review of the CORRACTS list, as provided by EDR, and dated 09/23/2004 has revealed that there are 2 CORRACTS sites within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
PATRICK METALS ELKHART	*1819 SOUTH 14TH STREET*	*1/8 - 1/4 SW*	*6*	*15*
HERMASEAL CO	*1101 LAFAYETTE ST*	*1/8 - 1/4 NNE*	*A8*	*21*

EXECUTIVE SUMMARY

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

A review of the RCRA-TSDF list, as provided by EDR, and dated 11/23/2004 has revealed that there is 1 RCRA-TSDF site within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
HERMASEAL CO	*1101 LAFAYETTE ST*	*1/8 - 1/4 NNE*	*A8*	*21*

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

A review of the RCRA-SQG list, as provided by EDR, and dated 11/23/2004 has revealed that there are 7 RCRA-SQG sites within approximately 0.25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CONRAIL RAIL YARD (ELKHART)	*SR 33*	*0 - 1/8*	*0*	*6*
PATRICK METALS ELKHART	*1819 SOUTH 14TH STREET*	*1/8 - 1/4 SW*	*6*	*15*
HERMASEAL CO	*1101 LAFAYETTE ST*	*1/8 - 1/4 NNE*	*A8*	*21*
AMERICAN ELECTRONIC COMPONENTS	1101 LAFAYETTE ST	1/8 - 1/4 NNE	A9	25
HERMASEAL CO	1101 LAFAYETTE ST	1/8 - 1/4 NNE	A10	25
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
ARA MFG CO	1317 INDIANA AVE	0 - 1/8 N	1	13
SELDOM REST BODY SHOP	*1317 W INDIANA AVE*	*1/8 - 1/4 NW*	*3*	*14*

STATE ASTM STANDARD

LUST: Lust List.

A review of the LUST list, as provided by EDR, and dated 08/04/2004 has revealed that there are 3

LUST sites within approximately 0.5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
GANO PLYWOOD INC	*1334 W WOLF AVE*	*1/8 - 1/4 SW*	*2*	*13*
OAKLAND AUTO SERVICE	*1207 W LUSHER AVE*	*1/4 - 1/2 S*	*12*	*27*
Lower Elevation	**Address**	**Dist / Dir**	**Map ID**	**Page**
SMOKE EXPRESS #3	*1589 W FRANKLIN ST*	*1/4 - 1/2 WNW*	*11*	*26*

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 Environmental Management's Indiana Registered Underground Storage Tanks list.

A review of the UST list, as provided by EDR, and dated 08/04/2004 has revealed that there are 2 UST sites within approximately 0.25 miles of the target property

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
GANO PLYWOOD INC	*1334 W WOLF AVE*	*1/8 - 1/4 SW*	*2*	*13*
ELKHART OPERATING HEADQUARTERS	907 OAKLAND AVE	1/8 - 1/4 N	5	14

FEDERAL ASTM SUPPLEMENTAL

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

A review of the ROD list, as provided by EDR, has revealed that there is 1 ROD site within approximately 1 mile of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
CONRAIL RAIL YARD (ELKHART)	*SR 33*	*0 - 1/8*	*0*	*6*

Mines: Mines Master Index File. The source of this database is the Dept. of Labor, Mine Safety and Health Administration.

A review of the MINES list, as provided by EDR, and dated 09/13/2004 has revealed that there is 1 MINES site within approximately 0 25 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
FIDLER, INC.		1/8 - 1/4 SW	7	20

BROWNFIELDS DATABASES

US BROWNFIELDS: The EPA's listing of Brownfields properites addressed by Cooperative Agreement Recipients and Brownfields properties addressed by Targeted Brownfields Assessments

A review of the US BROWNFIELDS list, as provided by EDR, has revealed that there is 1 US BROWNFIELDS

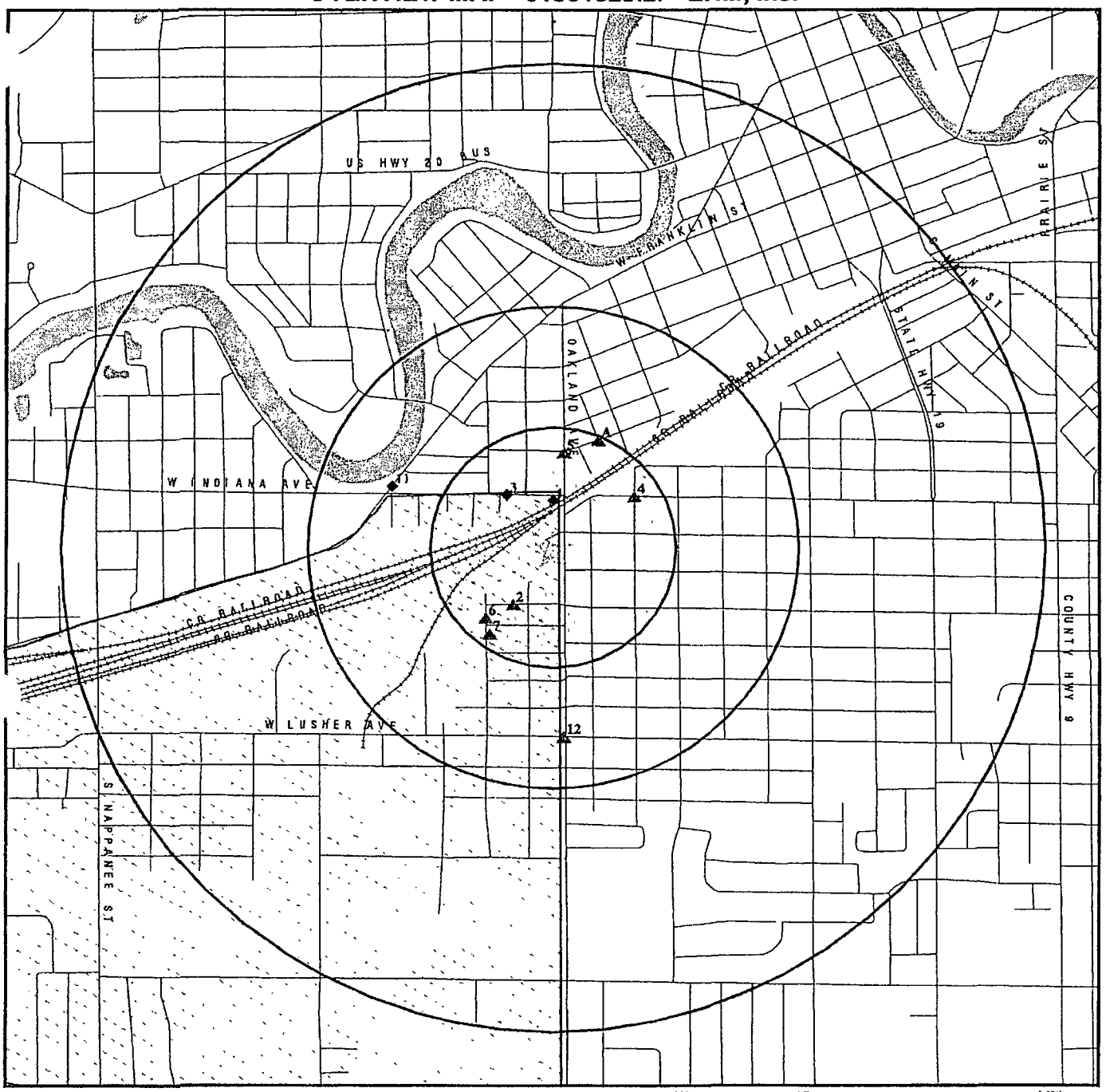
site within approximately 0 5 miles of the target property.

Equal/Higher Elevation	Address	Dist / Dir	Map ID	Page
BENHAM WEST BRAINFIELD SITE	10TH STREET/INDIANA AVE	1/8 - 1/4 ENE	4	14

Due to poor or inadequate address information, the following sites were not mapped:

Site Name	Database(s)
LUSHER AVENUE	SHWS
SYCAMORE STREET	SHWS
INDIANA AVENUE LANDFILL	Brownfields
BENHAM WEST BROWNFIELD SITE	Brownfields
WOODLAWN INDUSTRIAL DEVELOPMENT	CERCLIS, FINDS
WAGNER AVENUE SITE	CERC-NFRAP
ELKHART GASOLINE SPILL	CERC-NFRAP
WARNER & SONS INC C/D SITE	SWF/LF
ELKHART COUNTY LANDFILL	SWF/LF
SIX SPAN AMOCO	LUST
VARIOUS SITES	LUST, UST
SEE FAC ID 10907 DUP FILE 2	LUST
HUDSON BUILDING SUPPLY	IN Spills, UST
SIX SPAN AMOCO	UST
S AND S BODY SHOP	RCRA-SQG
INDIANA MICHIGAN POWER	RCRA-SQG, FINDS
CEISNICKI DUMP	ODI

OVERVIEW MAP - 01351823.2r - ERM, Inc.



- 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
- Dept. Defense Sites
- Indian Reservations BIA
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Federal Wetlands

TARGET PROPERTY:	Sturgin Iron and Metal	CUSTOMER:	ERM, Inc.
ADDRESS:	1631 Oakland Avenue	CONTACT:	Dan Ruslecki
CITY/STATE/ZIP:	Elkhart IN 46516	INQUIRY #:	01351823.2r
LAT/LONG:	41.6726 / 85.9853	DATE:	January 31, 2005 6:41 pm

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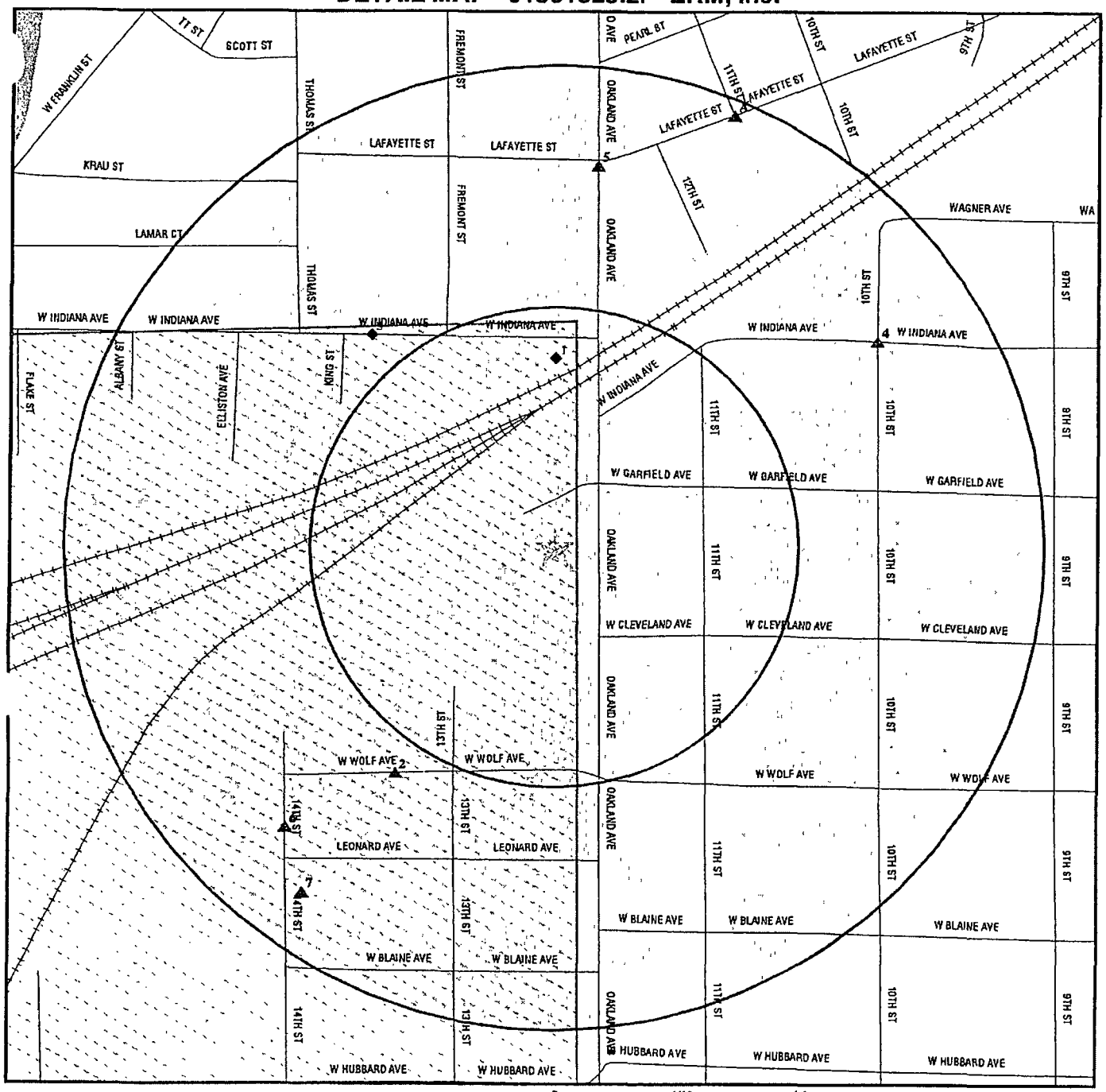
DETAIL MAP - 01351823.2r - ERM, Inc.



- 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
- Dept. Defense Sites
- Indian Reservations BIA
- Oil & Gas pipelines
- 100-year flood zone
- 500-year flood zone
- Federal Wetlands

TARGET PROPERTY:	Sturgin Iron and Metal	CUSTOMER:	ERM, Inc.
ADDRESS:	1631 Oakland Avenue	CONTACT:	Dan Rusiecki
CITY/STATE/ZIP:	Elkhart IN 46516	INQUIRY #:	01351823.2r
LAT/LONG:	41.6726 / 85.9853	DATE:	January 31, 2005 6:42 pm

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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	1	0	0	0	NR	1
Proposed NPL		1.000	0	0	0	0	NR	0
CERCLIS		0.500	1	0	0	NR	NR	1
CERC-NFRAP		0.250	0	1	NR	NR	NR	1
CORRACTS		1.000	0	2	0	0	NR	2
RCRA TSD		0.500	0	1	0	NR	NR	1
RCRA Lg. Quan Gen.		0.250	0	0	NR	NR	NR	0
RCRA Sm. Quan. Gen.		0.250	2	5	NR	NR	NR	7
ERNS		TP	NR	NR	NR	NR	NR	0
STATE ASTM STANDARD								
State Haz. Waste		1.000	0	0	0	0	NR	0
State Landfill		0.500	0	0	0	NR	NR	0
LUST		0.500	0	1	2	NR	NR	3
UST		0.250	0	2	NR	NR	NR	2
VCP		0.500	0	0	0	NR	NR	0
FEDERAL ASTM SUPPLEMENTAL								
CONSENT		1.000	0	0	0	0	NR	0
ROD		1.000	1	0	0	0	NR	1
Delisted NPL		1.000	0	0	0	0	NR	0
FINDS		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	1	NR	NR	NR	1
NPL Liens		TP	NR	NR	NR	NR	NR	0
PADS		TP	NR	NR	NR	NR	NR	0
DOD		1.000	0	0	0	0	NR	0
INDIAN RESERV		1.000	0	0	0	0	NR	0
ODI		0.500	0	0	0	NR	NR	0
UMTRA		0.500	0	0	0	NR	NR	0
FUDS		1.000	0	0	0	0	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
SSTS		TP	NR	NR	NR	NR	NR	0
FTTS		TP	NR	NR	NR	NR	NR	0
STATE OR LOCAL ASTM SUPPLEMENTAL								
IN Spills		TP	NR	NR	NR	NR	NR	0
BULK		TP	NR	NR	NR	NR	NR	0
DRYCLEANERS		0.250	0	0	NR	NR	NR	0
EDR PROPRIETARY HISTORICAL DATABASES								
Coal Gas		1.000	0	0	0	0	NR	0

MAP FINDINGS SUMMARY

Database	Target Property	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
BROWNFIELDS DATABASES								
US BROWNFIELDS		0.500	0	1	0	NR	NR	1
Brownfields		0.500	0	0	0	NR	NR	0
AUL		0.500	0	0	0	NR	NR	0
VCP		0.500	0	0	0	NR	NR	0

NOTES:

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.

NPL **CONRAIL RAIL YARD (ELKHART)** **CERCLIS 1000353185**
Region **SR 33** **RCRA-SQG IND000715490**
ELKHART, IN 46514 **FINDS**
< 1/8 **IN Spills**
1 ft. **NPL**
ROD

CERCLIS Classification Data:

Site incident category	Not reported	Federal Facility:	Not a Federal Facility
Non NPL Status:	Not reported		
Ownership Status	Private	NPL Status:	Currently on the Final NPL
Contact:	BRAD BRADLEY	Contact Tel	(312) 886-4742
Contact Title:	Not reported		
Contact	LAWRENCE SCHMITT	Contact Tel	(312) 353-6565
Contact Title	Not reported		

Site Description: The railyard began operations in 1956 as part of the New York Central Railroad, and continued operations as a subsidiary of the Penn Central Transportation Company until 1976 From 1961 to 1968, numerous citizen complaints regarding oil discharges from the railyard to the St Joseph River were filed with state and local authorities Between 1966 and 1969 a tank car containing carbon tetrachloride collided with another car during humping operations at the railyard, causing the release of appro ximately 16,000 gallons of carbon tetrachloride. In 1976 operations at the railyard were transferred to the Consolidated Rail Corporation (Conrail) From 1976 to the present, spills and releases of oil, diesel fuel, hydrochloric acid, caustic soda, and *various petroleum-related substances have occurred there.*
Track-cleaning substances (unknown chemical composition) and engine degreasers were also used and disposed of at the railyard. In 1986, a resident reported to EPA that his residential w ell contained elevated levels of volatile organic compounds Later in 1986, the EPA/Technical Assistance Team (EPA/TAT) performed sample analysis indicating that several residential wells contained trichloroethylene (TCE), with concentrations as hig h as 4,870 ppb, and carbon tetrachloride (CCl4), with concentations as high as 6,680 ppb.
Bottled water was provided to residents with affected wells, and many residents installed carbon filters after being connected to the water-main extension from the city The Indiana Department of Environmental Management assisted in the operation and maintenance of these filters until 1992. IDEM also periodically sampled the wells to monitor migration. EPA/TAT later discovered soil contamination EPA s ent a notice to Conrail in 1988, offering them the opportunity to undertake the RI/FS. Conrail expressed a willingness to undertake only part of the RI/FS, so EPA determined that Conrail had not presented a "good faith" offer to conduct the entire investigation. Later in 1988, EPA entered into a contract to have the RI/FS conducted. The RI was conducted in three phases, the first of which was completed in January 1990 and consisted of a soil gas survey, soil sampling, and ground water sampl ing for TCE and CCl4. The second phase, summarized in 1992, preliminarily identified potential sources contributing to contamination The third phase defined the path of ground water contamination plumes. An interim ROD was signed in June 1991 bas ed on the phase I and II RI results. EPA issued a Unilateral Administrative Order for Remedial Design and Remedial Action requiring Conrail and Penn Central to perform

CONRAIL RAIL YARD (ELKHART) (Continued) **1000353185**

remedial actions Only Conrail has complied. The Interim Remedial Action consi sts of institutional controls, inluding deed restrictions, a monitoring program for ground water and air, ground water extraction, collection, treatment, and discharge; fence installation; provision of an alternate water supply. The Interim Remedial Action was approved for implementation in 1994, and should begin before the end of 1994.
The 675-acre Conrail Railyard site is adjacent to and within the southwestern city limits of Elkhart, Indiana It is bounded to the north by US33 (Franklin Street), on the east by State Route 19, to the south by Mishawaka Road, and to the west by S tate Route 219. The railyard is an electronically controlled hump yard which serves as a classification distribution yard for freight cars The yard, which began operations In 1956, processes about 74 trains per day via 15 receiving and 14 departing tracks Car repair, engine cleaning, and diesel refueling facilities are also located on the yard. The actual study area includes the railyard and encompasses about 2,500 acres with generally flat topography. The study area is bounded on the nort h by the St. Joseph River, on the west by Baugo Bay, on the east by Oakland Ave, and on the south by the southern border of the Conrail railyard Several light industrial properties are within the study area to the north and northwest of the railyar d and along the eastern and southern portions of the study area. Several residential areas, with the total population of 3,500, are located within the study area, about 1.5 miles away from the site. About 3,000 people use private residential wells for their water supply. Crawford ditch originates at the site and flows intermittently to the St Joseph River. Floodplains and wetland areas exist along both the St Joseph River and Baugo Bay The rail yard began operations in 1956 as part of t he New York Central Railroad, and continued as a subsidiary of the Penn Central Transportation Company (now known as American Premier Underwriters) until 1976. From 1962 to 1968, numerous citizen complaints regarding oil discharges from the rail yar d to the St Joseph River via the Crawford Ditch were filed with state and local authorities. In 1976, operations at the rail yard were transferred to the Consolidated Rail Yard Corporation (Conrail) From 1976 to the present, spills and releas
es of oil, diesel fuel, hydrochloric acid, caustic soda, and various petroleum-related substances have occurred there Reports also indicate that a track-cleaning substance (the chemical composition of which is unknown) and engine degreasers were u sed and disposed of at the rail yard The Conrail Site is partially located within the southwestern city limits of Elkhart, Indiana. The remainder of the Site extends into St Joseph County to the west. The Site encompasses the 675-acre Elkhart Ya rd of Conrail (now operated by Norfolk Southern), and the area to the north to the St Joseph River, most of which is residential. Areas of groundwater contamination extend from within the Conrail Rail Yard in two directions, north and northwest, in to residential areas, designated as the County Road 1 area, the LaRue Street area, the Vistula Avenue area, and the Charles Avenue area (see Figure 1). Contaminants detected in samples collected from private wells in these areas include carbon tetra chloride (CCl4), trichloroethylene (TCE), and other volatile organic compounds (VOC's) Based upon sampling performed by EPA representatives in 1986, bottled water was provided to residents whose wells were affected by the contamination Either car bon filters or water main connections were later installed in residences to ensure safe drinking water.

CONRAIL RAIL YARD (ELKHART) (Continued) **1000353185**

CERCLIS Assessment History.

Assessment:	DISCOVERY	Completed.	07/01/1983
Assessment:	PRELIMINARY ASSESSMENT	Completed:	02/05/1987
Assessment.	PRELIMINARY ASSESSMENT	Completed.	09/11/1987
Assessment:	NPL RP SEARCH	Completed:	12/30/1987
Assessment:	PROPOSAL TO NPL	Completed:	06/24/1988
Assessment	HRS PACKAGE	Completed:	06/24/1988
Assessment:	SITE INSPECTION	Completed:	06/24/1988
Assessment:	RI/FS NEGOTIATIONS	Completed:	09/29/1988
Assessment:	REMOVAL ASSESSMENT	Completed	07/25/1990
Assessment:	FINAL LISTING ON NPL	Completed	08/30/1990
Assessment.	REMOVAL	Completed:	05/12/1991
Assessment:	REMOVAL ASSESSMENT	Completed	06/25/1991
Assessment:	RECORD OF DECISION	Completed:	06/28/1991
Assessment:	COMBINED RI/FS	Completed	06/28/1991
Assessment	RD/RA NEGOTIATIONS	Completed:	07/07/1992
Assessment:	UNILATERAL ADMIN ORDER	Completed	07/07/1992
Assessment	REMOVAL ASSESSMENT	Completed	05/27/1993
Assessment:	RISK/HEALTH ASSESSMENT	Completed:	03/31/1994
Assessment.	ECOLOGICAL RISK ASSESSMENT	Completed	03/31/1994
Assessment:	PRP RD	Completed:	06/02/1994
Assessment:	RECORD OF DECISION	Completed:	09/09/1994
Assessment:	COMBINED RI/FS	Completed:	09/09/1994
Assessment:	UNILATERAL ADMIN ORDER	Completed:	05/15/1995
Assessment.	Lodged By DOJ	Completed.	08/02/1996
Assessment:	CONSENT DECREE	Completed:	03/18/1997
Assessment:	PRP RA	Completed:	06/16/1997
Assessment:	Lodged By DOJ	Completed:	08/12/1997
Assessment:	CONSENT DECREE	Completed.	11/10/1997
Assessment	FIVE YEAR REVIEW	Completed.	09/23/1999
Assessment:	ROD Amendment	Completed	09/27/2000
Assessment	COMMUNITY INVOLVEMENT	Completed:	12/31/2001
Assessment.	PRP RD	Completed.	05/29/2003
Assessment	TECHNICAL ASSISTANCE GRANT	Completed	12/31/2003

CERCLIS Site Status:
Not reported

CERCLIS Alias Name(s):
COUNTY RD 1
COUNTY RD 1
COUNTY RD 1
CONRAIL RAILYARD ELKHART
CONRAIL RAILYARD ELKHART
CONRAIL RAILYARD ELKHART
CONRAIL RAIL YARD (ELKHART)

NPL:

EPA ID.	IND000715490
Region:	05
Federal:	General
Final Date.	08/30/1990

NPL SUMMARY:

Summary : Conditions at proposal June 24, 1988): Consolidated Rail Corp Conrail) has operated a rail yard on County Road 1 at the southwestern edge of Elkhart, Elkhart County, Indiana, since 1976. Previously, the 675 acre property had been a rail yard fo
r New York Central Railroad 1956 68) and Penn Central Railroad 1968 76).The Indiana Department of Environmental Management has documented numerous spills at

CONRAIL RAIL YARD (ELKHART) (Continued) **1000353185**

the rail yard since 1976 In June 1986, EPA s emergency removal program was asked by the El
khart County Health Department to confirm analyses indicating that local wells were contaminated with carbon tetrachloride and trichloroethylene TCE). EPA s investigation identified five areas covering about 5 acres requiring further study: the d
iesel shop, the area surrounding oil and water tanks, several areas where wastes may have been buried, the shop where car tanks were cleaned, and the Crawford Ditch, which flows into the St. Joseph River. Analyses indicate that soils in some of the
se areas contain carbon tetrachloride, and wells downgradient of the rail yard contain carbon tetrachloride, TCE, tetrachloroethylene, chloroform, and dichloroethane EPA installed activated carbon units at residences with contaminated wells. EPA
analyses indicate a plume of contaminated ground water that is 1 5 2 miles long and empties into the St Joseph River An estimated 55,000 people obtain drinking water from Elkhart municipal wells and private wells within 3 miles of the site Status
August 30, 1990) In June 1988, EPA issued a special notice letter offering Conrail the opportunity to conduct a remedial investigation/feasibility study RI/FS) to determine the type and extent of contamination at the site and identify alternat
ives for remedial action. In September 1988, EPA notified Conrail its response could not be considered an acceptable good faith offer. Accordingly, EPA is conducting the RI/FS, field work began in August 1989. Initial data confirmed the existen
ce of two plumes of contaminated ground water EPA is reviewing the data to assess the need for additional field work and interim remedial measures.Field investigations by a Conrail contractor found TCE and carbon tetrachloride in soil and ground w
ater within the rail yard

NPL Contaminant.

NPL Status:	Final
Substance Id	A030
Case Num:	540-59-0
Substance :	DICHLOROETHENE, NOS
Pathway :	NOT INDICATED
GW Scoring :	Not reported
SW Scoring .	Not reported
Air Scoring:	Not reported
Soil Scoring	Not reported
DC Scoring:	Not reported
FE Scoring.	Not reported

NPL Status.	Final
Substance Id:	C321
Case Num	Not reported
Substance :	TRICHLOROETHANE, NOS
Pathway :	NOT INDICATED
GW Scoring :	Not reported
SW Scoring :	Not reported
Air Scoring:	Not reported
Soil Scoring:	Not reported
DC Scoring:	Not reported
FE Scoring:	Not reported

NPL Status:	Final
Substance Id.	U044

CONRAIL RAIL YARD (ELKHART) (Continued) **1000353185**

Case Num:	67-66-3
Substance	CHLOROFORM
Pathway :	The Ground water migration route , or pathway.
GW Scoring	Observed Release & Toxicity
SW Scoring .	Not reported
Air Scoring	Not reported
Soil Scoring	Not reported
DC Scoring:	Not reported
FE Scoring.	Not reported
NPL Status.	Final
Substance Id:	U210
Case Num:	79-34-5
Substance :	TETRACHLOROETHENE
Pathway	The Ground water migration route , or pathway
GW Scoring :	Observed Release
SW Scoring :	Not reported
Air Scoring.	Not reported
Soil Scoring:	Not reported
DC Scoring.	Not reported
FE Scoring:	Not reported
NPL Status:	Final
Substance Id.	U211
Case Num:	56-23-5
Substance	CARBON TETRACHLORIDE
Pathway :	The Ground water migration route , or pathway.
GW Scoring	Observed Release & Toxicity
SW Scoring .	Not reported
Air Scoring:	Not reported
Soil Scoring:	Not reported
DC Scoring:	Not reported
FE Scoring	Not reported
NPL Status	Final
Substance Id.	U228
Case Num:	79-01-6
Substance :	TRICHLOROETHYLENE (TCE), 1,1,2-
Pathway	The Ground water migration route , or pathway
GW Scoring :	Observed Release
SW Scoring :	Not reported
Air Scoring	Not reported
Soil Scoring:	Not reported
DC Scoring	Not reported
FE Scoring:	Not reported

NPL Site.

CERCLIS Id:	IND000715490
Site City:	Elkhart
Site State	IN
NPL Status:	Final
Status Date:	08/30/90
Federal Site:	Not reported
HRS Score:	42.24
GW Score:	73.08
SW Score:	0 00
Air Score.	0 00
Soil Score:	0.00
DC Score	0.00

CONRAIL RAIL YARD (ELKHART) (Continued) **1000353185**

FE Score: 0 0

NPL Char:

NPL Status: Final
Category Description: DEPTH TO AQUIFER
Category Value 16

NPL Status: Final
Category Description: DISTANCE TO THE NEAREST POPULATION
Category Value 0

NPL Status: Final
Category Description OBSERVED RELEASE-Ground Water
Category Value: Not reported

NPL Status Final
Category Description: OTHER GROUND WATER USE-Industrial Process Cooling
Category Value: Not reported

NPL Status: Final
Category Description PERMIT-None
Category Value: Not reported

NPL Status Final
Category Description: PHYSICAL STATE-Liquid
Category Value Not reported

NPL Status: Final
Category Description: SITE ACTIVITY WASTE SOURCE-Ground Water Plume
Category Value: Not reported

NPL Status: Final
Category Description: SITE ACTIVITY WASTE SOURCE-Industry Railroad
Category Value: Not reported

NPL Status: Final
Category Description: SURFACE WATER ADJACENT TO SITE-Drain Ditch
Category Value: Not reported

NPL Status: Final
Category Description: SURFACE WATER ADJACENT TO SITE-River
Category Value Not reported

NPL SITE STATUS
NPL Status: Final
Proposed Date 06/24/1988
Final Date: 08/30/1990
Deleted Date: Not reported

ROD:
Full-text of USEPA Record of Decision(s) is available from EDR

CONRAIL RAIL YARD (ELKHART) (Continued) **1000353185**

RCRAInfo·
Owner: NAME NOT REPORTED
(312) 555-1212
EPA ID IND000715490
Contact· KEITH R MILLER
(540) 981-4154
Classification: Conditionally Exempt Small Quantity Generator
TSDF Activities. Not reported

BIENNIAL REPORTS.
Last Biennial Reporting Year: 2001

Waste	Quantity (Lbs)
D008	2500 00

Violation Status. Violations exist

Regulation Violated· 279 22c
Area of Violation: INUOA
Date Violation Determined· 09/28/1998
Actual Date Achieved Compliance 12/23/1998

Enforcement Action WRITTEN INFORMAL
Enforcement Action Date· 11/18/1998
Penalty Type: Not reported

There are 1 violation record(s) reported at this site:

Evaluation	Area of Violation	Date of Compliance
Compliance Evaluation Inspection	INUOA	19981223

FINDS
Other Pertinent Environmental Activity Identified at Site:
Aerometric Information Retneval System/AIRS Facility Subsystem
Comprehensive Environmental Response, Compensation and Liability Information System
Integrated Compliance Information
Permit Compliance System
Resource Conservation and Recovery Act Information system

SPILL.
Facility ID. 198906002
Incident Date· 05/31/1989 Report Date 06/01/1989
Spill Type· Spill
Spill Source Trans - RR
Contained: No
Water Affected. Elkhart Area Affected Miles
Fish Killed: 0 Wtr Supply Affctd· No
Enforcement. NONE
Spilled Amount. 0 Units: Gallons
Recovered Amnt: 0 Units. Unknown Units
Material: Diesel Fuel
Cleanup Duration· 0

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
1 North < 1/8 520 ft. Relative: Lower Actual: 748 ft.	**ARA MFG CO** **1317 INDIANA AVE** **ELKHART, IN 46515**	RCRA-SQG	1000124161 IND981779473

RCRAInfo:
- Owner: HAKES PHILIP M (312) 555-1212
- EPA ID: IND981779473
- Contact: Not reported
- Classification: Small Quantity Generator
- TSDF Activities: Not reported
- Violation Status: No violations found

Map ID / Direction / Distance / Distance (ft.) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
2 SW 1/8-1/4 754 ft. Relative: Higher Actual: 754 ft.	**GANO PLYWOOD INC** **1334 W WOLF AVE** **ELKHART, IN 46516**	LUST UST	1000762618 N/A

LUST:
- Facility ID: 2305
- Owner Name: Gano Plywood
- Incident Number: 199008582
- Priority: Low
- Affected Area: Soil
- Description: NFA-94 guidance

UST:
- Facility ID: 2305
- Tank Number: 1
- Tank Status: PERMANENTLY OUT OF SERVICE
- Install Date: / /
- Closure Date: Not reported
- Owner Id: 1693
- Company Name: Gano Plywood Inc
- Mailing Address: 1334 W Wolf Ave, Elkhart, IN 46516
- Closure Status: Open

- Facility ID: 2305
- Tank Number: 2
- Tank Status: PERMANENTLY OUT OF SERVICE
- Install Date: / /
- Closure Date: Not reported
- Owner Id: 1693
- Company Name: Gano Plywood Inc
- Mailing Address: 1334 W Wolf Ave, Elkhart, IN 46516
- Closure Status: Open

Map ID / Direction / Distance / Distance (ft) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
3 NW 1/8-1/4 767 ft. Relative: Lower Actual: 747 ft.	**SELDOM REST BODY SHOP** **1317 W INDIANA AVE** **ELKHART, IN 46516**	RCRA-SQG FINDS	1000464300 IND025012329

RCRAInfo
Owner: NA
(312) 555-1212
EPA ID: IND025012329
Contact: Not reported
Classification: Small Quantity Generator
TSDF Activities. Not reported

Violation Status. Violations exist

Regulation Violated:	Not reported
Area of Violation:	GENERATOR-ALL REQUIREMENTS (OVERSIGHT)
Date Violation Determined	07/25/1986
Actual Date Achieved Compliance	12/07/1988
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	07/25/1986
Penalty Type:	Not reported

There are 1 violation record(s) reported at this site:

Evaluation	Area of Violation	Date of Compliance
Other Evaluation	GENERATOR-ALL REQUIREMENTS (OVERSIGHT)	19881207

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Indiana Facility Registry System
Resource Conservation and Recovery Act Information system

Map ID / Direction / Distance / Distance (ft) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
4 ENE 1/8-1/4 1037 ft. Relative: Higher Actual: 755 ft.	**BENHAM WEST BRAINFIELD SITE** **10TH STREET/INDIANA AVE** **ELKHART, IN 46516**	US BROWNFIELDS	1007265918 N/A

US BROWNFIELDS:

Pilot Name.	Not reported
EPA Region:	05
EPA ID	INB000508971
Site ID:	0508971
Ownership Type:	Not reported
Action.	TARGETED BROWNFIELDS ASSESSMENTS
Action Complete Date:	07/03/2003

Map ID / Direction / Distance / Distance (ft) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
5 North 1/8-1/4 1053 ft. Relative: Equal Actual: 750 ft.	**ELKHART OPERATING HEADQUARTERS** **907 OAKLAND AVE** **ELKHART, IN 46515**	UST	1000754191 N/A

UST:

Facility ID:	6087
Tank Number:	1
Tank Status:	CURRENTLY IN USE
Install Date.	/ /
Closure Date:	Not reported
Owner Id:	4502
Company Name.	Northern In Public Service- Sidney Rice

ELKHART OPERATING HEADQUARTERS (Continued) **1000754191**

Mailing Address: 801 E 86th Ave
Merrillville, IN 46410
Closure Status: Open

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6 SW 1/8-1/4 1056 ft. **PATRICK METALS ELKHART** **RCRA-SQG 1000892729**
1819 SOUTH 14TH STREET **FINDS IND005470521**
ELKHART, IN 46515 **CORRACTS**
CERC-NFRAP

Relative: Higher

Actual: 754 ft.

CERCLIS-NFRAP Classification Data:
Site Incident Category: Not reported
Non NPL Code: DR
Ownership Status: Unknown
Federal Facility: Not a Federal Facility
NPL Status: Not on the NPL

CERCLIS-NFRAP Assessment History

Assessment:	DISCOVERY	Completed: 01/21/1992
Assessment:	PRELIMINARY ASSESSMENT	Completed 03/27/1992
Assessment:	ARCHIVE SITE	Completed: 12/13/1995

CERCLIS-NFRAP Alias Name(s):
ILC PRODUCTS CO INC ALUMINUM E
ILC PRODUCTS COMPANY, INC.

CORRACTS Data:

EPA Id:	IND005470521
Region:	5
Area Name:	ENTIRE FACILITY
Actual Date:	03/09/1992
Corrective Action:	CA050 - RFA Completed
2002 NAICS Title	Coating, Engraving, Heat Treating, and Allied Activities

EPA Id:	IND005470521
Region:	5
Area Name:	ENTIRE FACILITY
Actual Date:	02/25/1992
Corrective Action:	CA225YE - Stabilization Measures Evaluation, This facility ,is amenable to stabilization activity based on the, status of corrective action work at the facility, technical factors, the degree of risk, timing considerations and administrative considerations
2002 NAICS Title	Coating, Engraving, Heat Treating, and Allied Activities

EPA Id:	IND005470521
Region:	5
Area Name:	ENTIRE FACILITY
Actual Date	03/31/1992
Corrective Action:	CA075LO - CA Prioritization, Facility or area was assigned a low corrective action priority
2002 NAICS Title.	Coating, Engraving, Heat Treating, and Allied Activities

RCRAInfo Corrective Action Summary:
Event: CA Prioritization, Facility or area was assigned a low corrective action priority
Event Date: 03/31/1992

PATRICK METALS ELKHART (Continued) **1000892729**

Event. RFA Completed
Event Date 03/09/1992

Event: Stabilization Measures Evaluation,This facility is amenable to stabilization activity based on the status of corrective action work at the facility, technical factors, the degree of risk, timing considerations and administrative considerations.
Event Date: 02/25/1992

RCRAInfo:
Owner: ILC PRODUCTS CO INC
(219) 293-6565
EPA ID: IND005470521

Contact: DAVID THOMPSON
(219) 293-6565

Classification. Small Quantity Generator
TSDF Activities Not reported

BIENNIAL REPORTS
Last Biennial Reporting Year. 2001

Waste	Quantity (Lbs)	Waste	Quantity (Lbs)
D001	34833.00	F003	62621.00
F005	62621 00		

Violation Status: Violations exist

Regulation Violated: 262 34a3
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 09/27/2000
Actual Date Achieved Compliance Not reported

Regulation Violated: 262 34/265 173a
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 09/27/2000
Actual Date Achieved Compliance: Not reported

Regulation Violated: 262.34c1ii
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined. 09/27/2000
Actual Date Achieved Compliance: Not reported

Regulation Violated 262.34a2
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 09/27/2000
Actual Date Achieved Compliance: Not reported

Regulation Violated: Not reported
Area of Violation GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined 09/18/1997
Actual Date Achieved Compliance 01/30/1998

Regulation Violated. Not reported
Area of Violation: INUWR
Date Violation Determined: 09/18/1997
Actual Date Achieved Compliance 01/30/1998

Regulation Violated: Not reported
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined 06/11/1993
Actual Date Achieved Compliance: 03/25/1998

PATRICK METALS ELKHART (Continued) **1000892729**

Regulation Violated:	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined	06/11/1993
Actual Date Achieved Compliance	03/25/1998
Regulation Violated	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	06/11/1993
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation.	TSD-LAND BAN REQUIREMENTS
Date Violation Determined	06/11/1993
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation.	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	06/11/1993
Actual Date Achieved Compliance.	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-MANIFEST REQUIREMENTS
Date Violation Determined.	06/11/1993
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	06/11/1993
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation.	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	06/11/1993
Actual Date Achieved Compliance	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-OTHER REQUIREMENTS
Date Violation Determined	06/11/1993
Actual Date Achieved Compliance	03/25/1998
Regulation Violated.	Not reported
Area of Violation:	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined:	09/23/1992
Actual Date Achieved Compliance.	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined	02/14/1992
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS
Date Violation Determined:	02/14/1992
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined	02/14/1992
Actual Date Achieved Compliance:	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	02/14/1992

PATRICK METALS ELKHART (Continued) **1000892729**

Actual Date Achieved Compliance	03/25/1998
Regulation Violated	Not reported
Area of Violation:	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS
Date Violation Determined:	02/14/1992
Actual Date Achieved Compliance.	03/25/1998
Regulation Violated:	Not reported
Area of Violation:	GENERATOR-OTHER REQUIREMENTS
Date Violation Determined.	02/14/1992
Actual Date Achieved Compliance	03/25/1998
Regulation Violated	Not reported
Area of Violation:	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	09/04/1990
Actual Date Achieved Compliance:	Not reported
Regulation Violated	Not reported
Area of Violation:	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined.	09/04/1990
Actual Date Achieved Compliance:	Not reported
Regulation Violated:	Not reported
Area of Violation	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS
Date Violation Determined	09/04/1990
Actual Date Achieved Compliance	Not reported
Regulation Violated.	Not reported
Area of Violation.	GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined:	09/04/1990
Actual Date Achieved Compliance:	Not reported
Regulation Violated:	Not reported
Area of Violation:	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined	10/29/1987
Actual Date Achieved Compliance:	03/25/1998
Enforcement Action:	INITIAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date	08/18/1988
Penalty Type	Final Monetary Penalty
Enforcement Action:	FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date	09/30/1988
Penalty Type:	Final Monetary Penalty
Regulation Violated:	Not reported
Area of Violation:	TSD-OTHER REQUIREMENTS
Date Violation Determined:	10/09/1986
Actual Date Achieved Compliance:	03/25/1998
Enforcement Action.	WRITTEN INFORMAL
Enforcement Action Date:	04/06/1987
Penalty Type:	Final Monetary Penalty
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	12/29/1988
Penalty Type:	Final Monetary Penalty
Enforcement Action:	FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date:	04/18/1989
Penalty Type:	Final Monetary Penalty
Regulation Violated.	Not reported
Area of Violation:	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS

PATRICK METALS ELKHART (Continued) 1000892729

Date Violation Determined: 10/11/1984
Actual Date Achieved Compliance: 03/25/1998

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 04/06/1987
Penalty Type: Final Monetary Penalty

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/29/1988
Penalty Type: Final Monetary Penalty

Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date 04/18/1989
Penalty Type: Final Monetary Penalty

Regulation Violated: Not reported
Area of Violation: GENERATOR-OTHER REQUIREMENTS
Date Violation Determined: 10/11/1984
Actual Date Achieved Compliance: 03/25/1998

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 04/06/1987
Penalty Type: Final Monetary Penalty

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 12/29/1988
Penalty Type: Final Monetary Penalty

Enforcement Action FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date. 04/18/1989
Penalty Type: Final Monetary Penalty

There are 30 violation record(s) reported at this site:

Evaluation	Area of Violation	Date of Compliance
Compliance Schedule Evaluation	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
Compliance Schedule Evaluation	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980130
	INUWR	19980130
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980130
	INUWR	19980130
Compliance Evaluation Inspection	TSD-GENERAL STANDARDS	19980325
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325
	TSD-LAND BAN REQUIREMENTS	19980325
	GENERATOR-GENERAL REQUIREMENTS	19980325
	GENERATOR-MANIFEST REQUIREMENTS	19980325
	GENERATOR-GENERAL REQUIREMENTS	19980325
	GENERATOR-OTHER REQUIREMENTS	19980325
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19980325
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325
	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19980325

PATRICK METALS ELKHART (Continued) **1000892729**

	GENERATOR-OTHER REQUIREMENTS	19980325
	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19980325
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	
	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	
Compliance Evaluation Inspection	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
	TSD-OTHER REQUIREMENTS	19980325
	GENERATOR-OTHER REQUIREMENTS	19980325
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19980325
Non-Financial Record Review	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
	TSD-OTHER REQUIREMENTS	19980325
	GENERATOR-OTHER REQUIREMENTS	19980325
Compliance Evaluation Inspection	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
	TSD-OTHER REQUIREMENTS	19980325
	GENERATOR-OTHER REQUIREMENTS	19980325
Compliance Evaluation Inspection	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19980325
	GENERATOR-OTHER REQUIREMENTS	19980325

FINDS:
Other Pertinent Environmental Activity Identified at Site:
Aerometric Information Retrieval System/AIRS Facility Subsystem
Indiana Facility Registry System
National Emissions Inventory
Resource Conservation and Recovery Act Information system
Toxics Release Inventory

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7 **FIDLER, INC.** **MINES** **M100027133**
SW **N/A**
1/8-1/4 **ELKHART (County), IN**
1164 ft.

Relative:
Higher

Actual:
755 ft.

U S MINES:

Mine ID	1200779	SIC Codes.	14410 00000 00000 00000 00000 00000
Entity Name	PIT #3	Company:	FIDLER, INC.
State FIPS code:	18	County FIPS code:	039
Status Date	12/06/1977	Status:	Not reported
Operation Class.	Non-coal mining	Number of Shops:	6
Number of Pits:	000	Number of Plants:	0
Latitude.	41 40 12	Longitude:	085 59 16

FIDLER, INC. (Continued) **M100027133**

U S MINE VIOLATIONS

Operator:	Fidler Inc		
Mine Name:	Pit #3		
Mined Material:	Construction Sand and Gravel		
Ownership Date	03/01/00	Mine Type:	Surface
Mine Status:	Intermittent	Status Date:	12/06/77
Violation Number:	6156118	Date Issued:	04/16/03
Action Type:	104A		
Date Abated	04/16/03	Citation/Order:	C
S & S:	N	Standard	56
Proposed Penalty:	60	Contractor ID:	Not reported
Paid Penalty:	60		
Assess Case Status code:		Closed	
Assessment Status code:		Proposed	

Operator:	Fidler Inc		
Mine Name:	Pit #3		
Mined Material	Construction Sand and Gravel		
Ownership Date:	03/01/00	Mine Type.	Surface
Mine Status:	Intermittent	Status Date:	12/06/77
Violation Number:	6156590	Date Issued.	07/07/04
Action Type:	104A		
Date Abated.	07/08/04	Citation/Order:	C
S & S:	N	Standard:	56.12025
Proposed Penalty:	60	Contractor ID:	Not reported
Paid Penalty:	0		
Assess. Case Status code:		Received	
Assessment Status code:		Proposed	

A8 **HERMASEAL CO** **RCRA-SQG** **1000841365**
NNE **1101 LAFAYETTE ST** **FINDS** **46515HRMSL11**
1/8-1/4 **ELKHART, IN 46514** **TRIS**
1277 ft. **RCRA-TSDF**
CORRACTS

Site 1 of 3 in cluster A

Relative:
Higher

CORRACTS Data:

Actual:
753 ft.

EPA Id:	IND980501936
Region:	5
Area Name:	ENTIRE FACILITY
Actual Date:	12/28/1992
Corrective Action:	CA075LO - CA Prioritization, Facility or area was assigned a low corrective action priority
2002 NAICS Title:	Not Reported

RCRAInfo Corrective Action Summary:

Event:	CA Prioritization, Facility or area was assigned a low corrective action priority.
Event Date.	12/28/1992

HERMASEAL CO (Continued) **1000841365**

RCRAInfo:
Owner: DURAKOOL INC
(312) 555-1212
EPA ID: IND980501936
Contact: GEORGE BUCKLEN
(219) 264-1116
Classification: TSDF
TSDF Activities: Not reported

BIENNIAL REPORTS:
Last Biennial Reporting Year: 2001

Waste	Quantity (Lbs)	Waste	Quantity (Lbs)
D009	8280 00	F001	3784.00
F006	1300.00	U151	25.00

Violation Status: Violations exist

Regulation Violated: Not reported
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 01/29/1997
Actual Date Achieved Compliance: 07/24/1997
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/18/1997
Penalty Type: Not reported

Regulation Violated: Not reported
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined 01/29/1997
Actual Date Achieved Compliance: 07/24/1997
Enforcement Action WRITTEN INFORMAL
Enforcement Action Date 02/18/1997
Penalty Type: Not reported

Regulation Violated: Not reported
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined. 01/29/1997
Actual Date Achieved Compliance: 07/24/1997
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/18/1997
Penalty Type: Not reported

Regulation Violated: Not reported
Area of Violation: TSD-CLOSURE/POST-CLOSURE REQUIREMENTS
Date Violation Determined. 01/29/1996
Actual Date Achieved Compliance: 07/24/1997
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/18/1997
Penalty Type: Not reported

Regulation Violated: 262C
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 03/14/1994
Actual Date Achieved Compliance: 10/01/1994
Enforcement Action WRITTEN INFORMAL
Enforcement Action Date. 06/01/1994
Penalty Type Not reported

HERMASEAL CO (Continued) **1000841365**

Regulation Violated	264.16
Area of Violation:	TSD-GENERAL STANDARDS
Date Violation Determined.	03/14/1994
Actual Date Achieved Compliance:	10/01/1994
Enforcement Action.	WRITTEN INFORMAL
Enforcement Action Date:	06/01/1994
Penalty Type·	Not reported
Regulation Violated:	264.73
Area of Violation:	TSD-OTHER REQUIREMENTS
Date Violation Determined.	03/14/1994
Actual Date Achieved Compliance.	10/01/1994
Enforcement Action.	WRITTEN INFORMAL
Enforcement Action Date:	06/01/1994
Penalty Type·	Not reported
Regulation Violated·	Not reported
Area of Violation:	TSD-OTHER REQUIREMENTS
Date Violation Determined·	02/13/1992
Actual Date Achieved Compliance:	02/08/1993
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date·	05/18/1992
Penalty Type:	Not reported
Regulation Violated:	Not reported
Area of Violation·	GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined:	02/13/1992
Actual Date Achieved Compliance.	02/08/1993
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date·	05/18/1992
Penalty Type:	Not reported
Regulation Violated:	Not reported
Area of Violation	TSD-OTHER REQUIREMENTS
Date Violation Determined	02/13/1992
Actual Date Achieved Compliance	02/08/1993
Enforcement Action	WRITTEN INFORMAL
Enforcement Action Date:	05/18/1992
Penalty Type	Not reported
Regulation Violated:	40 CFR 268.50
Area of Violation:	TSD-LAND BAN REQUIREMENTS
Date Violation Determined.	02/13/1992
Actual Date Achieved Compliance·	06/22/1993
Regulation Violated:	Not reported
Area of Violation	GENERATOR-LAND BAN REQUIREMENTS
Date Violation Determined:	12/01/1989
Actual Date Achieved Compliance·	04/02/1991
Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date	11/26/1990
Penalty Type·	Not reported
Regulation Violated.	Not reported
Area of Violation:	TSD-LAND BAN REQUIREMENTS
Date Violation Determined:	12/01/1989
Actual Date Achieved Compliance:	04/02/1991

HERMASEAL CO (Continued) **1000841365**

Enforcement Action:	WRITTEN INFORMAL
Enforcement Action Date:	11/26/1990
Penalty Type:	Not reported
Regulation Violated:	Not reported
Area of Violation:	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined	12/21/1987
Actual Date Achieved Compliance:	01/24/1991
Enforcement Action:	INITIAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date	09/30/1988
Penalty Type	Final Monetary Penalty
Regulation Violated:	Not reported
Area of Violation:	TSD-OTHER REQUIREMENTS (OVERSIGHT)
Date Violation Determined.	12/21/1987
Actual Date Achieved Compliance:	01/24/1991
Enforcement Action:	INITIAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date:	09/30/1988
Penalty Type:	Final Monetary Penalty
Regulation Violated:	Not reported
Area of Violation:	TSD-OTHER REQUIREMENTS (OVERSIGHT)
Date Violation Determined	12/21/1987
Actual Date Achieved Compliance	01/24/1991
Enforcement Action:	INITIAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date:	09/30/1988
Penalty Type:	Final Monetary Penalty
Regulation Violated.	Not reported
Area of Violation:	GENERATOR-LAND BAN REQUIREMENTS
Date Violation Determined:	12/21/1987
Actual Date Achieved Compliance:	Not reported
Regulation Violated.	Not reported
Area of Violation:	TSD-LAND BAN REQUIREMENTS
Date Violation Determined	12/21/1987
Actual Date Achieved Compliance:	Not reported

There are 18 violation record(s) reported at this site

Evaluation	Area of Violation	Date of Compliance
Compliance Schedule Evaluation	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
Compliance Evaluation Inspection	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19970724
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19970724
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19941001
	TSD-GENERAL STANDARDS	19941001
	TSD-OTHER REQUIREMENTS	19941001
Compliance Schedule Evaluation	TSD-OTHER REQUIREMENTS	19930208
	GENERATOR-GENERAL REQUIREMENTS	19930208
	TSD-OTHER REQUIREMENTS	19930208
Compliance Evaluation Inspection	TSD-OTHER REQUIREMENTS	19930208
	GENERATOR-GENERAL REQUIREMENTS	19930208
	TSD-OTHER REQUIREMENTS	19930208
Land Disposal Restriction Requirements In	TSD-LAND BAN REQUIREMENTS	19930622

HERMASEAL CO (Continued) **1000841365**

Other Evaluation	GENERATOR-LAND BAN REQUIREMENTS	19910402
	TSD-LAND BAN REQUIREMENTS	19910402
Compliance Evaluation Inspection	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19910124
	TSD-OTHER REQUIREMENTS (OVERSIGHT)	19910124
	TSD-OTHER REQUIREMENTS (OVERSIGHT)	19910124
Other Evaluation	GENERATOR-LAND BAN REQUIREMENTS	
	TSD-LAND BAN REQUIREMENTS	

FINDS.
Other Pertinent Environmental Activity Identified at Site:
Indiana Facility Registry System
Resource Conservation and Recovery Act Information system
Toxics Release Inventory

A9
NNE
1/8-1/4
1277 ft.

Relative:
Higher

Actual:
753 ft.

AMERICAN ELECTRONIC COMPONENTS-LAF **RCRA-SQG** **1007093588**
1101 LAFAYETTE ST **INR000109942**
ELKHART, IN 46516

Site 2 of 3 in cluster A

RCRAInfo:
Owner: AMERICAN ELECTRONIC COMPONENTS
EPA ID: INR000109942
Contact. KENT SAYRE
(574) 264-1116
Classification: Small Quantity Generator
TSDF Activities: Not reported
Violation Status: No violations found

A10
NNE
1/8-1/4
1277 ft.

Relative:
Higher

Actual:
753 ft.

HERMASEAL CO **RCRA-SQG** **1000296493**
1101 LAFAYETTE ST **INT190010900**
ELKHART, IN 46515

Site 3 of 3 in cluster A

RCRAInfo
Owner: NAME NOT REPORTED
(312) 555-1212
EPA ID: INT190010900
Contact: Not reported
Classification: Small Quantity Generator
TSDF Activities: Not reported
Violation Status: No violations found

Map ID / Direction / Distance / Distance (ft) / Elevation	Site	Database(s)	EDR ID Number / EPA ID Number
11 WNW 1/4-1/2 1862 ft.	**SMOKE EXPRESS #3** **1589 W FRANKLIN ST** **ELKHART, IN 46516**	**LUST** **UST**	**U000191273** **N/A**

Relative:
Lower

Actual:
729 ft.

LUST:

Facility ID.	9068
Owner Name:	Yoder Mart
Incident Number:	198912516
Priority:	Medium
Affected Area:	Soil
Description	Active

UST:

Facility ID:	9068
Tank Number	1
Tank Status.	PERMANENTLY OUT OF SERVICE
Install Date:	/ /
Closure Date:	Not reported
Owner Id.	7610
Company Name	National Oil & Gas Inc
Mailing Address:	409 N Main St Po Box 476
	Bluffton, IN 46714
Closure Status:	Open

Facility ID:	9068
Tank Number:	2
Tank Status:	PERMANENTLY OUT OF SERVICE
Install Date:	/ /
Closure Date	Not reported
Owner Id:	7610
Company Name:	National Oil & Gas Inc
Mailing Address.	409 N Main St Po Box 476
	Bluffton, IN 46714
Closure Status	Open

Facility ID:	9068
Tank Number:	3
Tank Status	PERMANENTLY OUT OF SERVICE
Install Date.	/ /
Closure Date.	Not reported
Owner Id:	7610
Company Name:	National Oil & Gas Inc
Mailing Address	409 N Main St Po Box 476
	Bluffton, IN 46714
Closure Status:	Open

Facility ID	9068
Tank Number:	11
Tank Status:	CURRENTLY IN USE
Install Date	01/15/1990
Closure Date:	Not reported
Owner Id:	7610
Company Name	National Oil & Gas Inc
Mailing Address:	409 N Main St Po Box 476
	Bluffton, IN 46714
Closure Status:	Open

Facility ID:	9068

SMOKE EXPRESS #3 (Continued) **U000191273**

Tank Number: 12
Tank Status CURRENTLY IN USE
Install Date: *01/15/1990*
Closure Date: Not reported
Owner Id. 7610
Company Name: National Oil & Gas Inc
Mailing Address: 409 N Main St Po Box 476
Bluffton, IN 46714
Closure Status. Open

Facility ID 9068
Tank Number: 13
Tank Status: CURRENTLY IN USE
Install Date. 01/15/1990
Closure Date. Not reported
Owner Id: 7610
Company Name: National Oil & Gas Inc
Mailing Address. 409 N Main St Po Box 476
Bluffton, IN 46714
Closure Status: Open

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12 South 1/4-1/2 2077 ft. **OAKLAND AUTO SERVICE** **LUST U003094732**
1207 W LUSHER AVE **UST N/A**
ELKHART, IN 46517

Relative: Higher

Actual: 756 ft.

LUST:
Facility ID: 17117
Owner Name Oaklawn Service
Incident Number 199008593
Priority Low
Affected Area: Soil
Description: NFA-94 guidance

UST
Facility ID. 17117
Tank Number: 4
Tank Status: PERMANENTLY OUT OF SERVICE
Install Date: 01/01/1955
Closure Date 9/8/1995 0:00
Owner Id: 9609
Company Name: Gerald Mclemore
Mailing Address 1207 W Lusher Ave
Elkhart, IN 46517
Closure Status: Open

Facility ID 17117
Tank Number: 3
Tank Status: PERMANENTLY OUT OF SERVICE
Install Date: 01/01/1955
Closure Date: 9/8/1995 0.00
Owner Id 9609
Company Name: Gerald Mclemore
Mailing Address: 1207 W Lusher Ave
Elkhart, IN 46517
Closure Status: Open

Facility ID: 17117

OAKLAND AUTO SERVICE (Continued) **U003094732**

Tank Number: 2
Tank Status: PERMANENTLY OUT OF SERVICE
Install Date: 01/01/1955
Closure Date: 9/8/1995 0:00
Owner Id 9609
Company Name Gerald Mclemore
Mailing Address: 1207 W Lusher Ave
Elkhart, IN 46517
Closure Status. Open

Facility ID: 17117
Tank Number: 1
Tank Status: PERMANENTLY OUT OF SERVICE
Install Date: 01/01/1955
Closure Date: 9/8/1995 0 00
Owner Id: 9609
Company Name. Gerald Mclemore
Mailing Address. 1207 W Lusher Ave
Elkhart, IN 46517
Closure Status: Open

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
ELKHART	U000185035	HUDSON BUILDING SUPPLY	30244 CR 12		IN Spills, UST
ELKHART	U000186214	SIX SPAN AMOCO	21870 SR 120	46516	UST
ELKHART	U001444341	SIX SPAN AMOCO	21870 SR 120	46516	LUST
ELKHART	S106488209	WARNER & SONS INC C/D SITE	29099 US 33 W	46516	SWF/LF
ELKHART	S106488208	ELKHART COUNTY LANDFILL	59530 CR 7 SOUTH	46517	SWF/LF
ELKHART	S105678277	LUSHER AVENUE	CR18 AND 21ST STREET		SHWS
ELKHART	1003873057	WAGNER AVENUE SITE	NW CORNER OF WAGNER & SIXTH STREET	46516	CERC-NFRAP
ELKHART	U003209636	VARIOUS SITES	W FRANKLIN / INDIANA		LUST, UST
ELKHART	S105702675	INDIANA AVENUE LANDFILL	INDIANA AVENUE	46516	Brownfields
ELKHART	1001114913	WOODLAWN INDUSTRIAL DEVELOPMENT	INTERSECTION OF WOODLAWN & MCNAUGHTON	46516	CERCLIS, FINDS
ELKHART	1003870929	ELKHART GASOLINE SPILL	ST JOSEPH RIV & FRANKLIN ST	46516	CERC-NFRAP
ELKHART	1007093256	S AND S BODY SHOP	500 DR KING DR	46516	RCRA-SQG
ELKHART	S106350070	SEE FAC ID 10907 DUP FILE 2	N LUSHER ST		LUST
ELKHART	1004698782	INDIANA MICHIGAN POWER	3340 US RT 20 E	46516	RCRA-SQG, FINDS
ELKHART	1007444074	CEISNICKI DUMP	0.5 MI SOUTH OF US 20, EAST SIDE OF STATE ROAD 219		ODI
ELKHART	S105588662	BENHAM WEST BROWNFIELD SITE	6TH STREET/INDIANA AVENUE/OAKL	46516	Brownfields
ELKHART	S104325407	SYCAMORE STREET	100 SYCAMORE STREET		SHWS

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.
D008	LEAD
D009	MERCURY
F001	THE FOLLOWING SPENT HALOGENATED SOLVENTS USED IN DEGREASING: TETRACHLOROETHYLENE, TRICHLOROETHYLENE, METHYLENE CHLORIDE, 1,1,1-TRICHLOROETHANE, CARBON TETRACHLORIDE, AND CHLORINATED FLUOROCARBONS; ALL SPENT SOLVENT MIXTURES/BLENDS USED IN DEGREASING CONTAINING, BEFORE USE, A TOTAL OF TEN PERCENT OR MORE (BY VOLUME) OF ONE OR MORE OF THE ABOVE HALOGENATED SOLVENTS OR THOSE SOLVENTS LISTED IN F002, F004, AND F005, AND STILL BOTTOMS FROM THE RECOVERY OF THESE SPENT SOLVENTS AND SPENT SOLVENT MIXTURES.
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.
F006	WASTEWATER TREATMENT SLUDGES FROM ELECTROPLATING OPERATIONS EXCEPT FROM THE FOLLOWING PROCESSES: (1) SULFURIC ACID ANODIZING OF ALUMINUM; (2) TIN PLATING ON CARBON STEEL; (3) ZINC PLATING (SEGREGATED BASIS) ON CARBON STEEL; (4) ALUMINUM OR ZINC-ALUMINUM PLATING ON CARBON STEEL; (5) CLEANING/STRIPPING ASSOCIATED WITH TIN, ZINC AND ALUMINUM PLATING ON CARBON STEEL; AND (6) CHEMICAL ETCHING AND MILLING OF ALUMINUM.
U151	MERCURY

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 10/12/04
Date Made Active at EDR: 12/09/04
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR 11/02/04
Elapsed ASTM days: 37
Date of Last EDR Contact: 11/02/04

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: 09/23/04
Date Made Active at EDR 12/09/04
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 11/02/04
Elapsed ASTM days: 37
Date of Last EDR Contact: 11/02/04

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: 08/10/04
Date Made Active at EDR. 10/27/04
Database Release Frequency Quarterly

Date of Data Arrival at EDR. 09/21/04
Elapsed ASTM days. 36
Date of Last EDR Contact 12/21/04

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.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 08/10/04
Date Made Active at EDR: 10/27/04
Database Release Frequency: Quarterly
Date of Data Arrival at EDR: 09/21/04
Elapsed ASTM days: 36
Date of Last EDR Contact: 12/21/04

CORRACTS: Corrective Action Report
Source: EPA
Telephone: 800-424-9346
CORRACTS identifies hazardous waste handlers with RCRA corrective action activity

Date of Government Version: 09/23/04
Date Made Active at EDR: 11/18/04
Database Release Frequency: Semi-Annually
Date of Data Arrival at EDR: 10/07/04
Elapsed ASTM days: 42
Date of Last EDR Contact: 12/07/04

RCRA: Resource Conservation and Recovery Act Information
Source: EPA
Telephone: 800-424-9346
RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. RCRAInfo replaces the data recording and reporting abilities of the Resource Conservation and Recovery Information System (RCRIS). The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Conditionally exempt small quantity generators (CESQGs) generate less than 100 kg of hazardous waste, or less than 1 kg of acutely hazardous waste per month. Small quantity generators (SQGs) generate between 100 kg and 1,000 kg of hazardous waste per month. Large quantity generators (LQGs) generate over 1,000 kilograms (kg) of hazardous waste, or over 1 kg of acutely hazardous waste per month. Transporters are individuals or entities that move hazardous waste from the generator off-site to a facility that can recycle, treat, store, or dispose of the waste. TSDFs treat, store, or dispose of the waste.

Date of Government Version: 11/23/04
Date Made Active at EDR: 01/18/05
Database Release Frequency: Varies
Date of Data Arrival at EDR: 11/24/04
Elapsed ASTM days: 55
Date of Last EDR Contact: 11/24/04

ERNS: Emergency Response Notification System
Source: National Response Center, United States Coast Guard
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: 12/31/03
Date Made Active at EDR: 03/12/04
Database Release Frequency: Annually
Date of Data Arrival at EDR: 01/26/04
Elapsed ASTM days: 46
Date of Last EDR Contact: 10/25/04

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: 12/01/01
Database Release Frequency: Biennially
Date of Last EDR Contact: 12/13/04
Date of Next Scheduled EDR Contact: 03/14/05

CONSENT: Superfund (CERCLA) Consent Decrees
Source: Department of Justice, Consent Decree Library
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: 03/05/04
Database Release Frequency: Varies
Date of Last EDR Contact 10/25/04
Date of Next Scheduled EDR Contact: 01/24/05

ROD: Records Of Decision
Source EPA
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: 09/09/04
Database Release Frequency Annually
Date of Last EDR Contact: 01/05/05
Date of Next Scheduled EDR Contact 04/04/05

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: 10/12/04
Database Release Frequency. Quarterly
Date of Last EDR Contact: 11/02/04
Date of Next Scheduled EDR Contact 01/31/05

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: 09/09/04
Database Release Frequency: Quarterly
Date of Last EDR Contact: 01/03/05
Date of Next Scheduled EDR Contact 04/04/05

HMIRS: Hazardous Materials Information Reporting System
Source: U.S. Department of Transportation
Telephone 202-366-4555
Hazardous Materials Incident Report System. HMIRS contains hazardous material spill incidents reported to DOT.

Date of Government Version 09/08/04
Database Release Frequency Annually
Date of Last EDR Contact: 10/28/04
Date of Next Scheduled EDR Contact: 01/17/05

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: 07/15/04
Database Release Frequency: Quarterly
Date of Last EDR Contact: 01/03/05
Date of Next Scheduled EDR Contact: 04/04/05

MINES: Mines Master Index File
Source: Department of Labor, Mine Safety and Health Administration
Telephone. 303-231-5959

Date of Government Version: 09/13/04
Database Release Frequency: Semi-Annually
Date of Last EDR Contact: 12/28/04
Date of Next Scheduled EDR Contact: 03/28/05

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

NPL LIENS: Federal Superfund Liens
Source: EPA
Telephone: 202-564-4267
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 11/22/04
Date of Next Scheduled EDR Contact: 02/21/05

PADS: PCB Activity Database System
Source: EPA
Telephone: 202-564-3887
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: 09/30/04
Database Release Frequency: Annually
Date of Last EDR Contact. 11/12/04
Date of Next Scheduled EDR Contact. 02/07/05

DOD: Department of Defense Sites
Source: USGS
Telephone: 703-692-8801
This data set consists of federally owned or administered lands, administered by the Department of Defense, that have any area equal to or greater than 640 acres of the United States, Puerto Rico, and the U.S. Virgin Islands.

Date of Government Version: 10/01/03
Database Release Frequency: Semi-Annually
Date of Last EDR Contact: 11/12/04
Date of Next Scheduled EDR Contact 02/07/05

UMTRA: Uranium Mill Tailings Sites
Source Department of Energy
Telephone 505-845-0011
Uranium ore was mined by private companies for federal government use in national defense programs. When the mills shut down, large piles of the sand-like material (mill tailings) remain after uranium has been extracted from the ore. Levels of human exposure to radioactive materials from the piles are low; however, in some cases tailings were used as construction materials before the potential health hazards of the tailings were recognized. In 1978, 24 inactive uranium mill tailings sites in Oregon, Idaho, Wyoming, Utah, Colorado, New Mexico, Texas, North Dakota, South Dakota, Pennsylvania, and on Navajo and Hopi tribal lands, were targeted for cleanup by the Department of Energy

Date of Government Version: 04/22/04
Database Release Frequency Varies
Date of Last EDR Contact: 12/21/04
Date of Next Scheduled EDR Contact: 03/21/05

ODI: Open Dump Inventory
Source Environmental Protection Agency
Telephone 800-424-9346
An open dump is defined as a disposal facility that does not comply with one or more of the Part 257 or Part 258 Subtitle D Criteria

Date of Government Version: 06/30/85
Database Release Frequency: No Update Planned
Date of Last EDR Contact: 05/23/95
Date of Next Scheduled EDR Contact: N/A

FUDS: Formerly Used Defense Sites
Source U S Army Corps of Engineers
Telephone: 202-528-4285
The listing includes locations of Formerly Used Defense Sites properties where the US Army Corps of Engineers is actively working or will take necessary cleanup actions.

Date of Government Version: 12/31/03
Database Release Frequency: Varies
Date of Last EDR Contact: 01/03/05
Date of Next Scheduled EDR Contact 04/04/05

INDIAN RESERV: Indian Reservations
Source: USGS
Telephone 202-208-3710
This map layer portrays Indian administered lands of the United States that have any area equal to or greater than 640 acres.

Date of Government Version 10/01/03
Database Release Frequency: Semi-Annually
Date of Last EDR Contact. 11/12/04
Date of Next Scheduled EDR Contact: 02/07/05

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: 12/06/04
Date of Next Scheduled EDR Contact. 03/07/05

TRIS: Toxic Chemical Release Inventory System
Source: EPA
Telephone: 202-566-0250
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: 12/31/02
Database Release Frequency: Annually
Date of Last EDR Contact 12/20/04
Date of Next Scheduled EDR Contact: 03/21/05

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: 12/31/02
Database Release Frequency: Every 4 Years
Date of Last EDR Contact: 12/06/04
Date of Next Scheduled EDR Contact: 03/07/05

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: 04/13/04
Database Release Frequency Quarterly
Date of Last EDR Contact: 12/01/04
Date of Next Scheduled EDR Contact: 03/21/05

SSTS: Section 7 Tracking Systems
Source: EPA
Telephone 202-564-5008
Section 7 of the Federal Insecticide, Fungicide and Rodenticide Act, as amended (92 Stat. 829) requires all registered pesticide-producing establishments to submit a report to the Environmental Protection Agency by March 1st each year. Each establishment must report the types and amounts of pesticides, active ingredients and devices being produced, and those having been produced and sold or distributed in the past year.

Date of Government Version: 12/31/03
Database Release Frequency: Annually
Date of Last EDR Contact: 11/29/04
Date of Next Scheduled EDR Contact: 04/18/05

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: 09/13/04
Database Release Frequency: Quarterly

Date of Last EDR Contact: 12/01/04
Date of Next Scheduled EDR Contact: 03/21/05

STATE OF INDIANA ASTM STANDARD RECORDS

SHWS: List of Hazardous Waste Response Sites Scored Using the Indiana Scoring Model
Source: Department of Environmental Management
Telephone: 317-308-3052
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: 03/01/04
Date Made Active at EDR: 04/21/04
Database Release Frequency Annually

Date of Data Arrival at EDR: 03/31/04
Elapsed ASTM days: 21
Date of Last EDR Contact: 12/29/04

SWF/LF: Permitted Solid Waste Facilities
Source: Department of Environmental Management
Telephone: 317-232-0066
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: 09/03/04
Date Made Active at EDR 11/17/04
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 10/14/04
Elapsed ASTM days 34
Date of Last EDR Contact: 01/11/05

LUST: Lust Leaking Underground Storage Tank List
Source: Department of Environmental Management
Telephone. 317-308-3008
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 08/04/04
Date Made Active at EDR: 10/21/04
Database Release Frequency: Annually

Date of Data Arrival at EDR 09/28/04
Elapsed ASTM days: 23
Date of Last EDR Contact: 12/28/04

UST: Indiana Registered Underground Storage Tanks
Source Department of Environmental Management
Telephone: 317-308-3008
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. 08/04/04
Date Made Active at EDR: 10/19/04
Database Release Frequency. Quarterly

Date of Data Arrival at EDR: 09/28/04
Elapsed ASTM days: 21
Date of Last EDR Contact: 12/28/04

VCP: Voluntary Remediation Program Site List
Source Department of Environmental Management
Telephone. 317-234-0966
A current list of Voluntary Remediation Program sites that are no longer confidential.

Date of Government Version: 09/01/04
Date Made Active at EDR: 12/13/04
Database Release Frequency Semi-Annually

Date of Data Arrival at EDR 11/09/04
Elapsed ASTM days: 34
Date of Last EDR Contact: 11/09/04

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

STATE OF INDIANA ASTM SUPPLEMENTAL RECORDS

SPILLS: Spills Incidents
Source: Department of Environmental Management
Telephone: 317-308-3008

Date of Government Version 08/04/04
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 12/28/04
Date of Next Scheduled EDR Contact: 03/28/05

BULK: Registered Bulk Fertilizer and Pesticide Storage Facilities
Source: Office of Indiana State Chemist
Telephone: 765-494-0579
A listing of registered dry or liquid bulk fertilizer and pesticide storage facilities.

Date of Government Version: 09/28/04
Database Release Frequency: Varies

Date of Last EDR Contact: 12/13/04
Date of Next Scheduled EDR Contact 03/14/05

DRYCLEANERS: Drycleaner Facility Listing
Source. Department of Environmental Management
Telephone: 800-988-7901
A list of drycleaners involved in the Indiana 5-Star Environmental Recognition Program. It is a voluntary program that ranks participating drycleaners on a scale of one to five stars The program recognizes those drycleaners willing to do more for the environment and worker safety than the rules require. These drycleaners are going above and beyond the rules to protect the environment, their employees and their neighbors and customers.

Date of Government Version: 07/31/04
Database Release Frequency: Varies

Date of Last EDR Contact: 01/14/05
Date of Next Scheduled EDR Contact: 04/11/05

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.

BROWNFIELDS DATABASES

Brownfields: Brownfields Site List
Source: Department of Environmental Management
Telephone: 317-233-2570
A brownfield site is an industrial or commercial property that is abandoned, inactive, or underutilized, on which expansion or redeveloopment is complicated due to the actual or perceived environmental contamination.

Date of Government Version: 10/01/04
Database Release Frequency: Semi-Annually

Date of Last EDR Contact. 01/10/05
Date of Next Scheduled EDR Contact 03/28/05

VCP: Voluntary Remediation Program Site List
Source. Department of Environmental Management
Telephone 317-234-0966
A current list of Voluntary Remediation Program sites that are no longer confidential.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 09/01/04
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 11/09/04
Date of Next Scheduled EDR Contact: 02/07/05

AUL: Sites with Restrictions
Source: Department of Environmental Management
Telephone: 317-232-8603
Activity and use limitations include both engineering controls and institutional controls. A listing of Comfort/Site Status Letter sites that have been issued with controls.

Date of Government Version: 09/30/04
Database Release Frequency: Varies

Date of Last EDR Contact: 01/07/05
Date of Next Scheduled EDR Contact: 03/28/05

US BROWNFIELDS: A Listing of Brownfields Sites
Source: Environmental Protection Agency
Telephone: 202-566-2777
Included in the listing are brownfields properties addresses by Cooperative Agreement Recipients and brownfields properties addressed by Targeted Brownfields Assessments. Targeted Brownfields Assessments-EPA's Targeted Brownfields Assessments (TBA) program is designed to help states, tribes, and municipalities--especially those without EPA Brownfields Assessment Demonstration Pilots--minimize the uncertainties of contamination often associated with brownfields. Under the TBA program, EPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. Targeted Brownfields Assessments supplement and work with other efforts under EPA's Brownfields Initiative to promote cleanup and redevelopment of brownfields. Cooperative Agreement Recipients-States, political subdivisions, territories, and Indian tribes become Brownfields Cleanup Revolving Loan Fund (BCRLF) cooperative agreement recipients when they enter into BCRLF cooperative agreements with the U.S. EPA. EPA selects BCRLF cooperative agreement recipients based on a proposal and application process. BCRLF cooperative agreement recipients must use EPA funds provided through BCRLF cooperative agreement for specified brownfields-related cleanup activities.

Date of Government Version: N/A
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: N/A
Date of Next Scheduled EDR Contact: N/A

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

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

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

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

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

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

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

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

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

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

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

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

STREET AND ADDRESS INFORMATION

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GEOCHECK® - PHYSICAL SETTING SOURCE ADDENDUM

TARGET PROPERTY ADDRESS

STURGIN IRON AND METAL
1631 OAKLAND AVENUE
ELKHART, IN 46516

TARGET PROPERTY COORDINATES

Latitude (North):	41.672600 - 41° 40' 21 4"
Longitude (West).	85.985298 - 85° 59' 7.1"
Universal Tranverse Mercator:	Zone 16
UTM X (Meters):	584467.2
UTM Y (Meters):	4613710.5
Elevation:	750 ft above sea level

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).

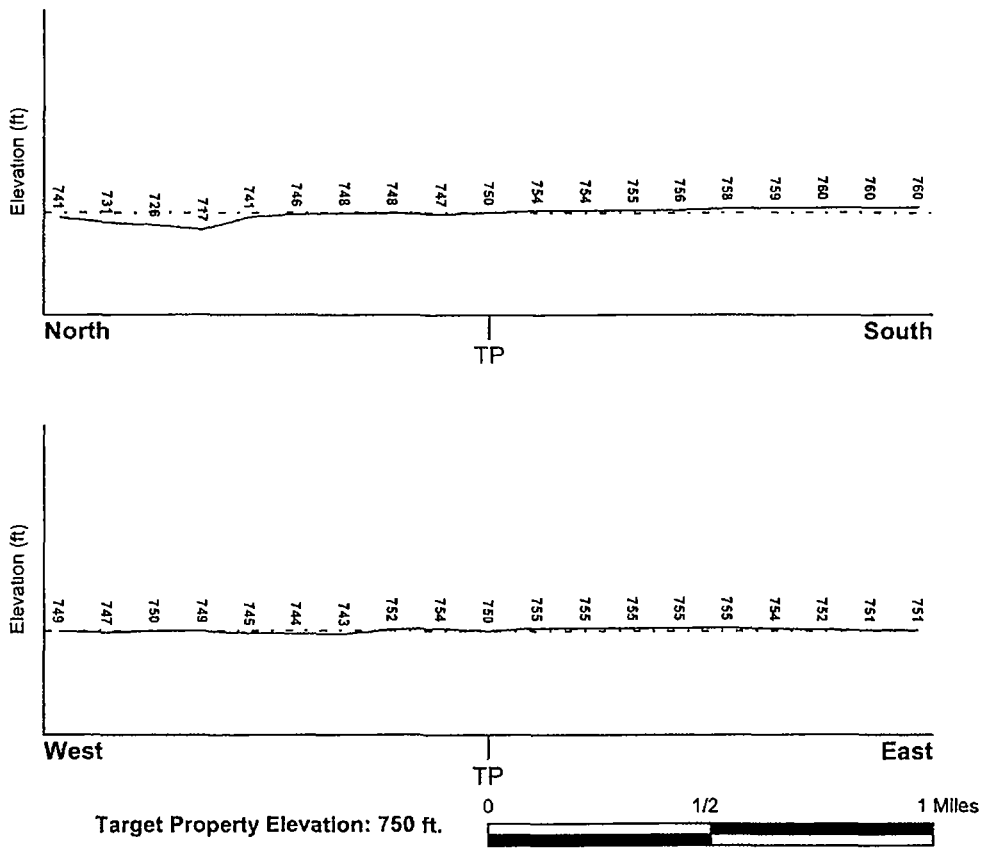
TOPOGRAPHIC INFORMATION

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.

TARGET PROPERTY TOPOGRAPHY

USGS Topographic Map:	41085-F8 ELKHART, IN
General Topographic Gradient:	General NW
Source:	USGS 7.5 min quad index

SURROUNDING TOPOGRAPHY: ELEVATION PROFILES



Source: Topography has been determined from the USGS 7 5' 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.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

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
ELKHART, IN	YES - refer to the Overview Map and Detail Map
Flood Plain Panel at Target Property.	1800570010C
Additional Panels in search area:	1800560015B

NATIONAL WETLAND INVENTORY

NWI Quad at Target Property	NWI Electronic Data Coverage
ELKHART	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.

AQUIFLOW®

Search Radius: 1.000 Mile.

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
11	1/2 - 1 Mile East	NNE

For additional site information, refer to Physical Setting Source Map Findings.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

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 **GEOLOGIC AGE IDENTIFICATION**

Era:	Paleozoic	Category:	Stratified Sequence
System:	Mississippian		
Series:	Osagean and Kinderhookian Series		
Code:	M1 *(decoded above as Era, System & Series)*		

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:	KALAMAZOO
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.

Hydric Status: Soil does not meet the requirements for a hydric soil.

Corrosion Potential - Uncoated Steel: LOW

Depth to Bedrock Min: > 60 inches

Depth to Bedrock Max: > 60 inches

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

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	11 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 10
2	11 inches	38 inches	clay loam	Silt-Clay Materials (more than 35 pct. passing No 200), Silty Soils.	COARSE-GRAINED SOILS, Sands, Sands with fines, Clayey sand.	Max 2 00 Min: 0.60	Max. 7 30 Min 5.10
3	38 inches	55 inches	sand	Granular materials (35 pct or less passing No. 200), Silty, or Clayey Gravel and Sand.	COARSE-GRAINED SOILS, Sands, Sands with fines, Silty Sand	Max: 20.00 Min 6 00	Max 7 80 Min: 5 10
4	55 inches	60 inches	stratified	Granular materials (35 pct. or less passing No. 200), Stone Fragments, Gravel and Sand.	COARSE-GRAINED SOILS, Sands, Clean Sands, Poorly graded sand.	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: sandy loam
muck
loamy sand
fine sand

Surficial Soil Types: sandy loam
muck
loamy sand
fine sand

Shallow Soil Types: sandy loam
loamy sand
sandy clay loam
gravelly - sandy clay loam
silty clay loam

Deeper Soil Types: muck
gravelly - sand
fine sand

sand
sand and gravel
mucky-peat

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	USGS0257812	1/4 - 1/2 Mile SSW
2	USGS0257822	1/4 - 1/2 Mile East
3	USGS0257898	1/4 - 1/2 Mile North
4	USGS0257897	1/2 - 1 Mile NE
A5	USGS0257743	1/2 - 1 Mile SE
A6	USGS0257794	1/2 - 1 Mile SE
A7	USGS0257795	1/2 - 1 Mile SE
8	USGS0257790	1/2 - 1 Mile SE
9	USGS0257793	1/2 - 1 Mile SW
B12	USGS0257760	1/2 - 1 Mile ESE
B13	USGS0257754	1/2 - 1 Mile ESE
14	USGS0257782	1/2 - 1 Mile SSW
15	USGS0257894	1/2 - 1 Mile WNW
C16	USGS0257774	1/2 - 1 Mile West
17	USGS0257818	1/2 - 1 Mile West
18	USGS0257909	1/2 - 1 Mile NNE
C19	USGS0257830	1/2 - 1 Mile West
21	USGS0257753	1/2 - 1 Mile WSW

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

MAP ID	WELL ID	LOCATION FROM TP

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

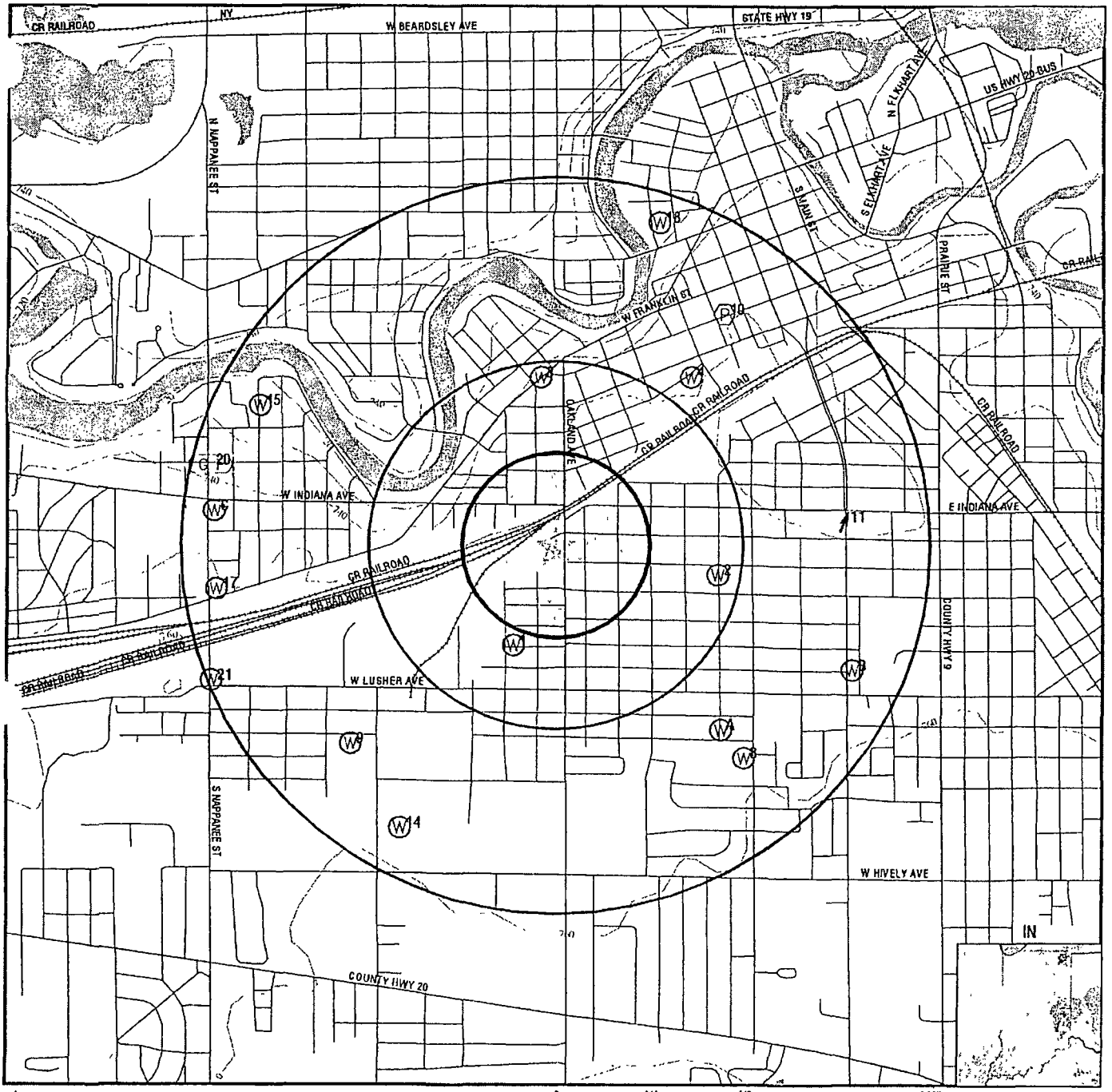
MAP ID	WELL ID	LOCATION FROM TP
10	IN2200801	1/2 - 1 Mile NE

Note PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

MAP ID	WELL ID	LOCATION FROM TP
No Wells Found		

PHYSICAL SETTING SOURCE MAP - 01351823.2r



- County Boundary
- Major Roads
- Contour Lines
- Earthquake epicenter, Richter 5 or greater
- Water Wells
- Public Water Supply Wells
- Cluster of Multiple Icons
- Groundwater Flow Direction
- (GI) Indeterminate Groundwater Flow at Location
- (GV) Groundwater Flow Varies at Location

TARGET PROPERTY:	Sturgin Iron and Metal	CUSTOMER:	ERM, Inc.
ADDRESS:	1631 Oakland Avenue	CONTACT:	Dan Ruslecki
CITY/STATE/ZIP:	Elkhart IN 46516	INQUIRY #:	01351823.2r
LAT/LONG:	41.6726 / 85.9853	DATE:	January 31, 2005 6:42 pm

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GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
1 **SSW** **1/4 - 1/2 Mile** **Higher**	**FED USGS**	**USGS0257812**

Agency	USEPA	Site ID.	414007085591501
Site Name.	WELL MW18 AT CONRAIL AT ELKHART		
Dec. Latitude	41.66866		
Dec. Longitude:	-85 9875		
Coord Sys·	NAD83		
State:	IN		
County:	Elkhart County		
Altitude	745.85		
Hydrologic code:	04050001		
Topographic	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date	19891016	Inven Date	Not Reported
Well Type.	Single well, other than collector or Ranney type		
Primary Aquifer.	Not Reported		
Aquifer type	Not Reported		
Well depth:	19 5		
Hole depth:	21.5	Source.	logs
Project no.	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1989-10-16	5.4	

	Database	EDR ID Number
2 **East** **1/4 - 1/2 Mile** **Higher**	**FED USGS**	**USGS0257822**

Agency·	USEPA	Site ID·	414017085583701
Site Name	WELL MW19D AT CONRAIL AT ELKHART		
Dec Latitude	41.67144		
Dec. Longitude	-85 97694		
Coord Sys:	NAD83		
State·	IN		
County.	Elkhart County		
Altitude:	749 77		
Hydrologic code.	04050001		
Topographic:	Not Reported		
Site Type.	Ground-water other than Spring		
Const Date:	19891103	Inven Date.	Not Reported
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer:	Not Reported		
Aquifer type:	Not Reported		
Well depth·	70		
Hole depth:	71.5	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements. 0

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Map ID
Direction
Distance
Elevation

	Database	EDR ID Number
3 **North** **1/4 - 1/2 Mile** **Lower**	**FED USGS**	**USGS0257898**

Agency	IN002	Site ID	414045085591001
Site Name	WELL F7 NEAR ELKHART T37NR5E		
Dec Latitude	41 67922		
Dec. Longitude:	-85 98611		
Coord Sys:	NAD83		
State:	IN		
County:	Elkhart County		
Altitude:	754		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type	Ground-water other than Spring		
Const Date	19340628	Inven Date:	19340628
Well Type	Single well, other than collector or Ranney type		
Primary Aquifer:	110QRNR		
Aquifer type:	Not Reported		
Well depth:	Not Reported		
Hole depth.	111	Source:	logs
Project no	Not Reported		

Ground-water levels, Number of Measurements 0

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4 **NE** **1/2 - 1 Mile** **Higher**		**FED USGS**	**USGS0257897**
Agency	USEPA	Site ID:	414045085584201
Site Name	WELL MW20D AT CONRAIL AT ELKHART IN		
Dec. Latitude	41.67922		
Dec. Longitude:	-85 97833		
Coord Sys	NAD83		
State:	IN		
County:	Elkhart County		
Altitude:	748.41		
Hydrologic code.	04050001		
Topographic:	Not Reported		
Site Type	Ground-water other than Spring		
Const Date:	19891013	Inven Date	Not Reported
Well Type	Single well, other than collector or Ranney type		
Primary Aquifer	Not Reported		
Aquifer type:	Not Reported		
Well depth:	81		
Hole depth:	81 5	Source:	logs
Project no.	Not Reported		

Ground-water levels, Number of Measurements: 0

A5 **SE** **1/2 - 1 Mile** **Higher**	**FED USGS**	**USGS0257743**

Agency:	USEPA	Site ID:	413957085583701
Site Name:	WELL MW16 AT CONRAIL AT ELKHART IN		
Dec Latitude.	41 66588		
Dec. Longitude:	-85.97694		
Coord Sys:	NAD83		
State.	IN		
County·	Elkhart County		
Altitude·	741 11		
Hydrologic code.	04050001		
Topographic.	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19891012	Inven Date	Not Reported
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer:	Not Reported		
Aquifer type.	Not Reported		
Well depth:	24.5		
Hole depth	26 5	Source:	logs
Project no·	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1989-10-12	3 4	

A6
SE
1/2 - 1 Mile
Higher

FED USGS **USGS0257794**

Agency:	USGS	Site ID:	413954085583601
Site Name·	USGS ELKHART WELL 15S 2 INCH STEEL 24 FT		
Dec. Latitude.	41 66505		
Dec. Longitude:	-85.97667		
Coord Sys:	NAD83		
State·	IN		
County:	Elkhart County		
Altitude:	760		
Hydrologic code	04050001		
Topographic:	Not Reported		
Site Type.	Ground-water other than Spring		
Const Date:	19771006	Inven Date:	Not Reported
Well Type·	Single well, other than collector or Ranney type		
Primary Aquifer:	112OTWS		
Aquifer type·	Unconfined single aquifer		
Well depth:	24		
Hole depth:	27	Source:	driller
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 24

Date	Feet below Surface	Feet to Sealevel	Date	Feet below Surface	Feet to Sealevel
1992-04-23	13.38		1991-10-31	13.91	
1991-04-12	12 22		1990-10-04	13 83	
1990-04-23	13.54		1989-10-17	18.80	
1989-04-20	18 40		1988-10-12	20.20	
1988-03-28	19.60		1987-10-20	19 70	
1987-04-27	18.80		1986-09-30	18 30	

Ground-water levels, continued.

Date	Feet below Surface	Feet to Sealevel	Date	Feet below Surface	Feet to Sealevel
1986-04-17	17.90		1985-11-11	19 00	
1985-04-11	16 60		1984-10-25	18.00	
1984-04-18	17.80		1983-10-26	18.10	
1983-04-18	16 80		1982-05-03	16 30	
1981-09-17	15 50		1981-05-13	16.90	
1980-12-11	17.40				
1977-10-06	16.49				

Note: The site had been pumped recently.

A7
SE
1/2 - 1 Mile
Higher

FED USGS **USGS0257795**

Agency.	USGS	Site ID	413954085583602
Site Name.	USGS ELKHART WELL 15D AT ELKHART IN		
Dec. Latitude:	41 66505		
Dec. Longitude	-85.97667		
Coord Sys:	NAD83		
State:	IN		
County·	Elkhart County		
Altitude	758		
Hydrologic code	04050001		
Topographic·	Not Reported		
Site Type	Ground-water other than Spring		
Const Date·	19781128	Inven Date·	Not Reported
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer·	112OTWS		
Aquifer type:	Unconfined single aquifer		
Well depth:	151		
Hole depth:	166	Source·	driller
Project no:	Not Reported		

Ground-water levels, Number of Measurements. 19

Date	Feet below Surface	Feet to Sealevel	Date	Feet below Surface	Feet to Sealevel
1989-10-17	16.80		1989-04-20	16.50	
1988-10-12	18 30		1988-03-28	17.60	
1987-10-20	17.80		1987-04-27	16 10	
1986-10-01	16 30		1986-04-17	15.90	
1985-11-11	17.00		1985-04-11	14 40	
1984-10-25	16.00		1984-04-18	16.20	
1983-10-26	16.60		1983-04-18	14 70	
1982-05-03	14.30		1981-09-17	13.50	
1981-05-13	14.90		1980-12-11	15 40	
1978-11-28	16				

8
SE
1/2 - 1 Mile
Higher

FED USGS **USGS0257790**

Agency:	USEPA	Site ID	413951085583201
Site Name:	BORING PB21 AT CONRAIL AT ELKHART IN		
Dec. Latitude.	41 66422		
Dec Longitude	-85 97556		
Coord Sys:	NAD83		
State:	IN		
County	Elkhart County		
Altitude:	752 37		
Hydrologic code:	04050001		
Topographic	Hillside (slope)		
Site Type:	Ground-water other than Spring		
Const Date:	19891009	Inven Date	Not Reported
Well Type.	Test hole, not completed as a well		
Primary Aquifer:	Not Reported		
Aquifer type	Not Reported		
Well depth:	Not Reported		
Hole depth:	130 5	Source	driller
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 0

9
SW
1/2 - 1 Mile
Higher

FED USGS **USGS0257793**

Agency:	IN002	Site ID:	413953085594501
Site Name:	WELL B32 T37NR5E AT ELKHART (GEMEIN. ERT WELL 14-1		
Dec. Latitude.	41 66477		
Dec Longitude.	-85 99583		
Coord Sys:	NAD83		
State:	IN		
County:	Elkhart County		
Altitude:	754 56		
Hydrologic code.	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date	19871104	Inven Date	Not Reported
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer:	112OTWS		
Aquifer type.	Unconfined single aquifer		
Well depth	35		
Hole depth:	38	Source.	driller
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1987-11-04	16.96	

10
NE
1/2 - 1 Mile
Higher

FRDS PWS **IN2200801**

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

PWS ID:	IN2200801	PWS Status:	Active
Date Initiated:	7601	Date Deactivated:	Not Reported
PWS Name:	CONCORD MALL STUART LANDERMAN 3701 SOUTH MAIN STREET ELKHART, IN 46517		
Addressee / Facility:	Not Reported		
Facility Latitude:	41 40 54	Facility Longitude:	085 58 36
City Served:	DALEVILLE		
Treatment Class:	Treated	Population:	00000025

PWS currently has or had major violation(s) or enforcement: Yes

VIOLATIONS INFORMATION:

Violation ID:	93V0001	Source ID.	Not Reported	PWS Phone	Not Reported
Vio beginning Date:	01/01/93	Vio. end Date:	12/31/93	Vio Period:	012 Months
Num required Samples:	Not Reported	Number of Samples Taken.		000	
Analysis Result:	Not Reported	Maximum Contaminant Level:		Not Reported	
Analysis Method:	Not Reported				
Violation Type:	Monitoring, Regular				
Contaminant:	NITRATE				
Vio. Awareness Date:	Not Reported				

ENFORCEMENT INFORMATION:

System Name	CONCORD MALL		
Violation Type:	Monitoring, Routine Major (TCR)		
Contaminant	COLIFORM (TCR)		
Compliance Period.	1995-07-01 - 1995-09-30	Analytical Value:	00000000.00
Violation ID.	9500001V	Enforcement ID.	9500001E
Enforcement Date:	1995-11-03	Enf. Action	State Public Notif Requested

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11
East
1/2 - 1 Mile
Lower

Site ID:	19568	**AQUIFLOW**	**4221**
Groundwater Flow:	NNE		
Water Table Depth.	8-9		
Date	Mar-91		

B12
ESE
1/2 - 1 Mile
Higher

FED USGS **USGS0257760**

Agency:	IN002	Site ID:	414004085581201
Site Name.	WELL A13 T37NR5E AT ELKHART		
Dec. Latitude.	41.66783		
Dec. Longitude:	-85.97		
Coord Sys:	NAD83		
State	IN		
County:	Elkhart County		
Altitude:	755		
Hydrologic code.	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19610823	Inven Date.	19610823
Well Type:	Single well, other than collector or Ranney type		

Primary Aquifer:	110QRNR		
Aquifer type	Unconfined single aquifer		
Well depth:	59		
Hole depth:	59	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements. 1

Date	Feet below Surface	Feet to Sealevel
1961-08-23	16	

B13
ESE
1/2 - 1 Mile
Higher

FED USGS **USGS0257754**

Agency:	IN002	Site ID	414003085581201
Site Name:	WELL 32 T37NR5E AT ELKHART		
Dec. Latitude:	41.66755		
Dec. Longitude	-85.97		
Coord Sys:	NAD83		
State:	IN		
County:	Elkhart County		
Altitude:	755		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19610823	Inven Date.	19610823
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer:	110QRNR		
Aquifer type	Confined single aquifer		
Well depth:	118		
Hole depth:	118	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1961-08-23	14	

14
SSW
1/2 - 1 Mile
Higher

FED USGS **USGS0257782**

Agency:	IN002	Site ID:	413941085593601
Site Name:	WELL 75 T37NR5E AT ELKHART		
Dec. Latitude:	41.66144		
Dec. Longitude:	-85.99333		
Coord Sys:	NAD83		
State:	IN		
County:	Elkhart County		
Altitude.	755		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19591130	Inven Date:	19591130
Well Type	Single well, other than collector or Ranney type		

Primary Aquifer:	110QRNR		
Aquifer type	Unconfined single aquifer		
Well depth:	89		
Hole depth	89	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements 1

Date	Feet below Surface	Feet to Sealevel
1959-11-30	14	

15
WNW
1/2 - 1 Mile
Lower

FED USGS **USGS0257894**

Agency:	IN002	Site ID:	414041086000201
Site Name:	WELL F37 T37NR5E AT ELKHART IN		
Dec. Latitude:	41.6781		
Dec. Longitude.	-86 00056		
Coord Sys:	NAD83		
State	IN		
County:	Elkhart County		
Altitude:	726		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type	Ground-water other than Spring		
Const Date:	19781102	Inven Date	Not Reported
Well Type	Single well, other than collector or Ranney type		
Primary Aquifer:	112OTWS		
Aquifer type:	Not Reported		
Well depth.	103		
Hole depth	103	Source:	driller
Project no.	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1978-11-02	5	

C16
West
1/2 - 1 Mile
Higher

FED USGS **USGS0257774**

Agency:	IN002	Site ID	414025086001001
Site Name:	WELL A12 T37NR5E AT ELKHART		
Dec. Latitude:	41.67366		
Dec. Longitude:	-86 00278		
Coord Sys:	NAD83		
State	IN		
County:	Elkhart County		
Altitude:	745		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19630601	Inven Date.	19630601
Well Type	Single well, other than collector or Ranney type		

Primary Aquifer:	110QRNR		
Aquifer type	Confined single aquifer		
Well depth:	53		
Hole depth	53	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1963-06-01	16.5	

17
West
1/2 - 1 Mile
Higher

FED USGS **USGS0257818**

Agency:	IN002	Site ID	414015086001001
Site Name:	WELL A11 T37NR5E AT ELKHART		
Dec. Latitude	41.67088		
Dec. Longitude:	-86.00278		
Coord Sys.	NAD83		
State:	IN		
County	Elkhart County		
Altitude.	755		
Hydrologic code	04050001		
Topographic	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19740802	Inven Date.	19740802
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer.	110QRNR		
Aquifer type	Confined single aquifer		
Well depth:	102		
Hole depth:	102	Source.	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1974-08-02	4	

18
NNE
1/2 - 1 Mile
Lower

FED USGS **USGS0257909**

Agency:	IN002	Site ID.	414107085584801
Site Name:	WELL 19 T37NR5E AT ELKHART		
Dec Latitude	41.68533		
Dec. Longitude:	-85.98		
Coord Sys:	NAD83		
State:	IN		
County.	Elkhart County		
Altitude:	725		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date	19650726	Inven Date:	19650726
Well Type:	Single well, other than collector or Ranney type		

Primary Aquifer:	110QRNR		
Aquifer type:	Confined single aquifer		
Well depth:	75		
Hole depth:	75	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements: 1

Date	Feet below Surface	Feet to Sealevel
1965-07-26	3	3

C19
West
1/2 - 1 Mile
Lower

FED USGS **USGS0257830**

Agency	IN002	Site ID:	414027086001101
Site Name:	WELL A10 T37NR5E AT ELKHART		
Dec. Latitude:	41 67422		
Dec. Longitude.	-86 00306		
Coord Sys:	NAD83		
State:	IN		
County:	Elkhart County		
Altitude:	740		
Hydrologic code:	04050001		
Topographic:	Not Reported		
Site Type.	Ground-water other than Spring		
Const Date:	19760203	Inven Date	19760203
Well Type:	Single well, other than collector or Ranney type		
Primary Aquifer:	110QRNR		
Aquifer type:	Confined single aquifer		
Well depth:	58		
Hole depth:	58	Source:	logs
Project no:	Not Reported		

Ground-water levels, Number of Measurements 1

Date	Feet below Surface	Feet to Sealevel
1976-02-03	15	

20
WNW
1/2 - 1 Mile
Lower

Site ID.	15134
Groundwater Flow:	NOT REPORTED
Water Table Depth:	10.71-12.43
Date:	Jan-98

AQUIFLOW **4210**

21
WSW
1/2 - 1 Mile
Higher

FED USGS **USGS0257753**

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS

Agency:	IN002	Site ID:	414002086001101
Site Name.	WELL A9 T37NR5E ELKHART		
Dec Latitude.	41.66727		
Dec Longitude	-86 00306		
Coord Sys:	NAD83		
State	IN		
County	Elkhart County		
Altitude:	752		
Hydrologic code	04050001		
Topographic.	Not Reported		
Site Type:	Ground-water other than Spring		
Const Date:	19651210	Inven Date:	19651210
Well Type	Single well, other than collector or Ranney type		
Primary Aquifer	110QRNR		
Aquifer type.	Not Reported		
Well depth	45		
Hole depth:	45	Source:	logs
Project no	Not Reported		

Ground-water levels, Number of Measurements 1

Date	Feet below Surface	Feet to Sealevel
1965-12-10	18	

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS
RADON

AREA RADON INFORMATION

State Database: IN Radon

Radon Test Results

City	County	Zip	Result
ELKHART	ELKHART	46516	5.099999904632568
ELKHART	ELKHART	46516	9.300000190734863
ELKHART	ELKHART	46516	7.800000190734863
ELKHART	ELKHART	46516	8.600000381469727
ELKHART	ELKHART	46516	11.80000019073486
ELKHART	ELKHART	46516	11.89999961853027
ELKHART	ELKHART	46516	0.200000002980232
ELKHART	ELKHART	46516	0
ELKHART	ELKHART	46516	6 400000095367432
ELKHART	ELKHART	46516	6.5
ELKHART	ELKHART	46516	8.800000190734863
ELKHART	ELKHART	46516	10 89999961853027
ELKHART	ELKHART	46516	2.299999952316284
ELKHART	ELKHART	46516	1 100000023841858
ELKHART	ELKHART	46516	4 099999904632568
ELKHART	ELKHART	46516	0.300000011920929
ELKHART	ELKHART	46516	4.800000190734863
ELKHART	ELKHART	46516	2.099999904632568
ELKHART	ELKHART	46516	3 400000095367432
ELKHART	ELKHART	46516	2 099999904632568
ELKHART	ELKHART	46516	1 600000023841858
ELKHART	ELKHART	46516	2.599999904632568
ELKHART	ELKHART	46516	3 599999904632568
ELKHART	ELKHART	46516	3 799999952316284
ELKHART	ELKHART	46516	1.100000023841858
ELKHART	ELKHART	46516	2 099999904632568
ELKHART	ELKHART	46516	3 299999952316284
ELKHART	ELKHART	46516	0 899999976158142
ELKHART	ELKHART	46516	1.700000047683716
ELKHART	ELKHART	46516	0 899999976158142
ELKHART	ELKHART	46516	3 099999904632568
CULVER		46516	1.600000023841858
CULVER	MARSHALL	46516	1 600000023841858
CULVER	MARSHALL	46516	2 299999952316284
CULVER	MARSHALL	46516	2 400000095367432
CULVER	MARSHALL	46516	1.799999952316284
CULVER	MARSHALL	46516	4 800000190734863
CULVER	MARSHALL	46516	1.899999976158142
BURKET	KOSCIUSCO	46516	1.299999952316284
BRISTOL	SULLIVAN	46516	0.5
MIDDLEBURY	ELKHART	46516	2 099999904632568
BRISTOL	SULLIVAN	46516	6.900000095367432
BRISTOL	SULLIVAN	46516	57.40000152587891
BRISTOL	SULLIVAN	46516	1 399999976158142
BRISTOL	SULLIVAN	46516	10.80000019073486
BRISTOL	SULLIVAN	46516	3.299999952316284
BRISTOL			

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS
RADON

AREA RADON INFORMATION

	SULLIVAN	46516	3 599999904632568
BRISTOL	SULLIVAN	46516	3.099999904632568
BRISTOL	SULLIVAN	46516	1.200000047683716
BRISTOL	SULLIVAN	46516	2 099999904632568
BRISTOL		46516	0.600000023841858
BRISTOL		46516	0
BRISTOL	ELKHART	46516	2 099999904632568
BRISTOL	ELKHART	46516	3 099999904632568
BRISTOL		46516	0 600000023841858
BRISTOL		46516	3.5
BRISTOL	ELKHART	46516	1 299999952316284
BRISTOL	ELKHART	46516	0 600000023841858
BRISTOL	ELKHART	46516	1 299999952316284
BRISTOL	ELKHART	46516	0 400000005960465
BRISTOL		46516	3 299999952316284
BRISTOL		46516	9 399999618530273
BRISTOL	ELKHART	46516	1
BRISTOL	ELKHART	46516	2 299999952316284

Federal EPA Radon Zone for ELKHART 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.

Federal Area Radon Information for Zip Code: 46516

Number of sites tested: 9

Area	Average Activity	% <4 pCi/L	% 4-20 pCi/L	% >20 pCi/L
Living Area - 1st Floor	1 650 pCi/L	100%	0%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	5 156 pCi/L	56%	44%	0%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

TOPOGRAPHIC INFORMATION

USGS 7.5' Digital Elevation Model (DEM)
Source: United States Geologic Survey
EDR acquired the USGS 7 5' Digital Elevation Model in 2002 7.5-Minute DEMs correspond to the USGS 1:24,000- and 1 25,000-scale topographic quadrangle maps.

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 2002 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
Source. Department of Agriculture, Natural Resources Conservation Services
The U S. Department of Agriculture's (USDA) Natural Resources Conservation Service (NRCS) leads the national Conservation 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: 202-564-3750
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· 202-564-3750
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: USGS National Water Inventory System (NWIS)
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 wells, springs, and other sources of groundwater

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STATE RECORDS

Public Water Supply Wells
Source: Department of Environmental Management
Telephone: 317-308-3323
Community and non-community drinking water wells.

RADON

State Database: IN Radon
Source: Department of Health
Telephone 317-233-7148
Radon Test Results

Area Radon Information
Source: USGS
Telephone 703-356-4020
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
Source: EPA
Telephone: 703-356-4020
Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Airport Landing Facilities: Private and public use landing facilities
Source: Federal Aviation Administration, 800-457-6656

Epicenters: World earthquake epicenters, Richter 5 or greater
Source. Department of Commerce, National Oceanic and Atmospheric Administration

Date EDR Searched Historical Sources:
City Directories Feb 02, 2005

Target Property:
1631 Oakland Avenue
Elkhart, IN 46516

PUR ID Year	*Uses*	*NAICS*	*Source*
1945	Address not Listed in Research Source	N/A	Polk City Directory
1959	Address not Listed in Research Source	N/A	Polk City Directory
1964	Address not Listed in Research Source	N/A	Polk City Directory
1969	Address not Listed in Research Source	N/A	Polk City Directory
1974	Address not Listed in Research Source	N/A	Polk City Directory
1979	Address not Listed in Research Source	N/A	Polk City Directory
1983	Address not Listed in Research Source	N/A	Polk City Directory
1988	Draggoo Electric Co		Polk City Directory
1993	Draggoo Group Inc		Polk City Directory
1998	Anew Company		Polk City Directory
2003	Anewco		Polk City Directory

Adjoining Properties

SURROUNDING
Multiple Addresses
Elkhart, IN 46516

PUR ID Year	*Uses*	*NAICS*	*Source*
1945	**OAKLAND AVE**		Polk City Directory
	Vacant (1613)	N/A	
	Residence (1614)		
	Address not listed in research source (1629)	N/A	
	Residence (1701)		
	Residence (1703)		
	Residence (1707)		
	Residence (1711)		
	Abbott's Grocery (1712)		
	Residence (1715)		
1959	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		

PUR ID *Year*	*Uses*	*NAICS*	*Source*
1959 (continued)			
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Vacant (1703)	N/A	
	Residence (1707)		
	Residence (1711)		
	Oakland Avenue Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1964	**OAKLAND AVE**		Polk City Directory
	Residence (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Residence (1707)		
	Residence (1711)		
	Nancy's Burger Store (1712)		
	Residence (1715)		
	-No other addresses within range		
1969	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1701)		
	Residence (1707)		
	Residence (1711)		
	Oakland Food Mart (1712)		
	Residence (1715)		
	-No other addresses within range		
1974	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Residence (1707)		
	Vacant (1711)	N/A	
	Rixter's Grocery (1712)		
	Residence (1715)		
	-No other addresses within range		
1979	**OAKLAND AVE**		Polk City Directory
	Paul Willis, Trucker (1614)		
	Elkhart Rubber Works Inc (1629)		
	Anchor Packing Co (1629)		

City of Elkhart

The city with a heart

February 16, 2005

Dan Rusiecki
Environmental Resources Management
3352 128th Avenue
Holland, MI 49424

Dear Mr. Rusiecki:

Enclosed you will find the following files for ANEWCO as per your February 11th request:

- The latest Industrial Wastewater Discharge Permit
- Two Enforcement Actions
- Sampling results (11/1/00 – 7/2/03) – Note the parameter limits listed at the top of sheet

Sincerely,

Greg Koehler
Pretreatment Coordinator

David L. Miller
Mayor

Public Works
& Utilities

Administration
1201 S. Nappanee Street
Elkhart, Indiana 46516
Phone: 574 293 2572
Fax: 574 293 7658

Customer Billing
921 N. Main Street
Elkhart, Indiana 46514
Phone: 574 264 4273
Fax: 574 206 8963

Board Of Public Works
229 S. Second Street
Elkhart, Indiana 46516
Phone: 574 294 5471
Fax: 574 293.7964

CITY OF ELKHART
PUBLIC WORKS & UTILITIES ADMINISTRATION
1201 S. Nappanee Street
Elkhart, Indiana 46516

INDUSTRIAL WASTEWATER DISCHARGE PERMIT
Permit No. 97-01

In compliance with the provisions the City of Elkhart Sewer Use and Rate Ordinance No. 4187, as amended,

ANEW COMPANY, INC.
1631 Oakland Avenue
Elkhart, Indiana 46516
(574) 293-9088

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Elkhart sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards or requirements under local, State, and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit. Nothing in this permit shall be construed to relieve the permittee from liabilities and administrative, civil or criminal penalties resulting from noncompliance with this permit or the City of Elkhart Sewer Use and Rate Ordinance No. 4187, as amended and Ordinance 4653.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Elkhart Sewer Use and Rate Ordinance No. 4187.

This permit incorporates the City of Elkhart Sewer Use and Rate Ordinance No. 4187 and the City of Elkhart Enforcement Response Plan. Anything not covered specifically by this permit shall be referred to the City of Elkhart Sewer Use and Rate Ordinance No. 4187 and the City of Elkhart Enforcement Response Plan. No exceptions will be implied and must be expressly stated.

EFFECTIVE DATE: **July 1, 2003**

EXPIRATION DATE: **July 1, 2008**

PART I. FACILITY DESCRIPTION

ANEW Company, Inc., is located at 1631 Oakland Avenue, Elkhart, Indiana. It is subject to the National Categorical Pretreatment Standards for the Metal Finishing Point Source Category, as listed in 40 CFR Part 433.17. More specifically, it is subject to Subpart A - Metal Finishing Subcategory, as a new source, therefore subject to Pretreatment Standards for New Sources (PSNS). The primary metal finishing operations are chemical etching on glass and mirrors.

The manufacturing process includes chemical etching of copper and silver. Wastewater is generated from rinses after cleaning and etching of mirror backing containing copper and silver. Operations are performed three to four hours per day, five days a week, at a rate of 800 gallons per day (gpd). The sanitary wastewater discharge is of 200 gallons per day and enters the sewer system combined with the process wastewater. A control manhole is present and identified on the diagram included in this permit.

PART II. EFFLUENT LIMITATIONS

A. During the period of **July 1, 2003 to July 1, 2008** permittee is authorized to discharge wastewater to the City of Elkhart sewer system through the control manhole located in the front of the building, on Oakland Avenue. The discharge includes sanitary and process water.

B. During the period **July 1, 2003 to July 1, 2008** the discharges of wastewaters shall not exceed the limits set fourth in this permit.

C. The following limits apply to **end of process wastewaters** discharged to the sewer system before they commingle with sanitary and/or other exempted or unregulated wastewaters:

PART III. SELF MONITORING REQUIREMENTS

A. From the period beginning on **July 1, 2003** to **July 1, 2008 the permittee shall monitor at the END OF PROCESS** for the following parameters, at the indicated frequency:

PARAMETER	FREQUENCY	SAMPLE TYPE[5]
pH	every three months	Grab[6]
Copper	every three months	one day's composite
Silver	every three months	one day's composite
Zinc	every three months	one day's composite
Cadmium	every six months	one day's composite
Chromium	every six months	one day's composite
Lead	every six months	one day's composite
Nickel	every six months	one day's composite
Cyanide (T)	every six months	Grab
TTO	every six months	Grab

B. A Grab sample is defined as an individual sample collected over a period of time not to exceed 15 minutes.

C. For this application, a composite sample is interpreted to be a minimum of four grab samples collected at equal intervals, collecting identical volumes, over the period of the work day. Upon review, the Pretreatment Office may increase the number of grab samples to be collected. The sample volume will depend on the number of analyses to be performed by the analytical laboratory. Alternative methods may be submitted for approval and must demonstrate to be representative of discharge.

PART IV. REPORTING

A. Self-monitoring sampling results from sampling conducted in a calendar month shall be summarized and reported to the Pretreatment Office in the following

[5] Samples are to be taken in accordance with 40 CFR Part 136 and amendments thereto, according to the City of Elkhart Sewer Use and Rate Ordinance, Section 3.5.1, unless specified otherwise in this permit.

[6] In a grab sample, pH must be taken within thirty minutes following collection of sample. If a continuous measurement is done, calibration data must be submitted to the Pretreatment Office with monitoring report. No pH taken from composite samples will be accepted.

F. If TTO reporting is required, it shall be performed according to instructions provided in the Forms section of this Permit. The instructions and required Certification Statement are included.

G. All reports shall include all proper signatures according to the City of Elkhart's Sewer Use and Rate Ordinance No. 4187, Section 3.3.4, as amended.

H. Notification and resampling shall be conducted in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Section 3.3.1, as amended.

PART V. POTW MONITORING AND INSPECTIONS

All POTW monitoring and inspections will be performed according to the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Article VIII.

PART VI. NONCOMPLIANCE AND ENFORCEMENT

All noncompliance and enforcement action determinations will be made according to the City of Elkhart Sewer Use and Rate Ordinance No.4187 and the City of Elkhart Enforcement Response Plan.

PART VII. STANDARD CONDITIONS AND PROHIBITIONS

All conditions and prohibitions contained in the City of Elkhart Sewer Use and Rate Ordinance No. 4187, as amended, shall be incorporated in this permit by reference, and any violations of any such conditions shall constitute violation of this permit.

PART VIII. REOPENER CLAUSE

This permit may be reopened and modified in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Section 3.2.3, as amended

PART IX. ANNUAL PUBLICATION

Annual publication of significant noncompliance will be conducted in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Section 4.6, as amended, and the City of Elkhart Enforcement Response Plan.

PART XVI. NOTICE OF PERMIT REVOCATION

This permit may be revoked pursuant to permittee noncompliance in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Section 4.2, as amended.

PART XVII. SEVERABILITY

If any provisions, paragraph, word, section or article of this permit is invalidated by the City of Elkhart Board of Public Works or any court of competent jurisdiction, the remaining provisions, paragraphs, words, sections and chapters shall not be affected and shall continue in full force and effect.

PART XVIII. RETENTION OF RECORDS

a) The permittee shall retain records of monitoring information, including all calibration and maintenance records and all original strip chart recordings for

b) continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three years from the date of the sample, measurement, report or application. This period may be extended at the request of the City of Elkhart at any time.

b) All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the City of Elkhart shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

This provision is mandated in accordance with the City of Elkhart Sewer Use and Rate Ordinance No. 4187, Section 3.2.8.

PART XIX. OPERATOR CERTIFICATION

The permittee shall comply with all operator certification requirements as mandated by state law.

PART XX: EXCEPTIONS

No exceptions shall be implied from any part of this permit. Any and all exceptions must be expressly stated upon approval by the City. All sections of

EXHIBIT 7

Reporting period: From January 1 to December 31, 2006

Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Information

Name: Elkhart Metals
Address: 1514 W Lusher Ave. - Po Box 4537
City: Elkhart State: IN Zip: 465140537
County: Elkhart
SIC Code: 5093 Dun & Bradstreet Number: 01 744 6454

FOR OFFICIAL USE ONLY — Date Received: ID:

Owner/Operator Name

Name: Sturgis Iron Metal Co Phone: 269 6517851
Mailing Address: 2160 S Centerville Road
City: Sturgis State: MI Zip: 49091

Emergency Contact

Name: Chuck Kelley Title: Operations Manager
Phone: 574 2950155 24-hr. Phone: 260 4631604
Name: Dale McDougle Title: Director of Operations
Phone: 574 3619944 24-hr. Phone: 574 3619944

Important: Read all instructions before completing form. Reporting Period From January 1 to December 31, 2006 ☐ Check if information below is identical to the information submitted last year.

Chemical Description	Physical and Health Hazards (check all that apply)	INVENTORY	Storage Codes and Location (Non-Confidential) Storage Locations	Optional
CAS 68334305 Trade Secret ☐ Chem. name Diesel Fuel Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	B 1 4 Fuel Station	☐
CAS 8006619 Trade Secret ☐ Chem. name Gasoline Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	B 1 4 Fuel Station A 1 4 Environmental	☐
CAS 7439921 Trade Secret ☐ Chem. name Lead Check all that apply: ☒ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name	☐ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☐ Immediate (acute) ☒ Delayed (chronic)	04 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	R 1 4 In lead-acid	☐

Certification (read and sign after completing all sections)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one through 5, and that based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate and complete.

CHUCK KELLEY, Ops Mgr — Chuck Kelley — 2-21-07

Name and official title of owner/operator's authorized representative — Signature — Date signed

OPTIONAL ATTACHEMENTS:

☒ I have attached a site plan.
☐ I have attached a list of site coordinate abbreviations.
☐ I have attached a description of dikes and other safeguard measures.

Tier Two
EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY
Specific information by Chemical

Facility Information
Name: Elkhart Metals
Address: 1514 W Lusher Ave. - Po Box 4537
City: Elkhart State: IN Zip: 465140537
County: Elkhart
SIC Code: 5093 Dun & Bradstreet Number: 01 744 6454
FOR OFFICIAL USE ONLY — Date Received: ID:

Owner/Operator Name
Name: Sturgis Iron Metal Co Phone: 269 6517851
Mailing Address: 2160 S Centerville Road
City: Sturgis State: MI Zip: 49091

Emergency Contact
Name: Chuck Kelley Title: Operations Manager
Phone: 574 2950155 24-hr. Phone: 269 4631604
Name: Dale McDougle Title: Director of Operations
Phone: 574 3619944 24-hr. Phone: 574 3619944

Important: Read all instructions before completing form. | Reporting Period From January 1 to December 31, 2006 | ☐ Check if information below identical to the information submitted last year.

Chemical Description	Physical and Health Hazards (check all that apply)	INVENTORY	Storage Codes and Location (Non-Confidential)	Optional
CAS 999013 Trade Secret ☐ Chem. name: Other Chemical 11 Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☐ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (code) 04 Avg. Daily Amount (code) 365 No. of Days On-site (days)	A 14 Located at truck D 14 Located at truck	☐
CAS 7782447 Trade Secret ☐ Chem. name: Oxygen Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☒ Sudden Release of Pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (code) 03 Avg. Daily Amount (code) 365 No. of Days On-site (days)	L 24 Process building and	☐
CAS 7664939 Trade Secret ☐ Chem. name: Sulfuric acid Check all that apply: ☒ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☒ EHS EHS Name: Sulfuric acid	☐ Fire ☐ Sudden Release of Pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	03 Max. Daily Amount (code) 03 Avg. Daily Amount (code) 365 No. of Days On-site (days)	R 14 In lead-acid	☐

Certification (read and sign after completing all sections)
I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages one through 5, and that based on my inquiry of these individuals responsible for obtaining the information, I believe the submitted information is true, accurate and complete.

Chuck Kelley Ops. Mgr. — Name and official title of owner/operator's or authorized representative
Chuck Kelley — Signature
2-21-07 — Date signed

OPTIONAL ATTACHEMENTS:
☒ I have attached a site plan.
☐ I have attached a list of site coordinate abbreviations.
☐ I have attached a description of dikes and other safeguard measures.

Storage Locations for Reporting Period: January 1, through December 31, 2006

Chemical Description:

CAS#: 68334305

Name: Diesel Fuel

Storage Locations:

1) Fuel Station
2)
3)
4)

Chemical Description:

CAS#: 8006619

Name: Gasoline

Storage Locations:

1) Fuel Station
2) Environmental Station
3)
4)

Storage Locations for Reporting Period: January 1, through December 31, 2006

Chemical Description:

CAS#: 7439921

Name: Lead

Storage Locations:

1) In lead-acid batteries in the NW corner of Process building, in new parts storage, and in non-ferrous production area
2)
3)
4)

Chemical Description:

CAS#: 999013

Name: Other Chemical 13

Storage Locations:

1) Located at truck maintenance, process building, shear, baler, environmental station, shredder, main substation
2) Located at truck maintenance, process building, shredder. The chemical contained in these containers is OIL
3)
4)

Storage Locations for Reporting Period: January 1, through December 31, 2006

Chemical Description:

CAS#: 7782447

Name: Oxygen

Storage Locations:

1) Process building and cast iron breakage area
2)
3)
4)

Chemical Description:

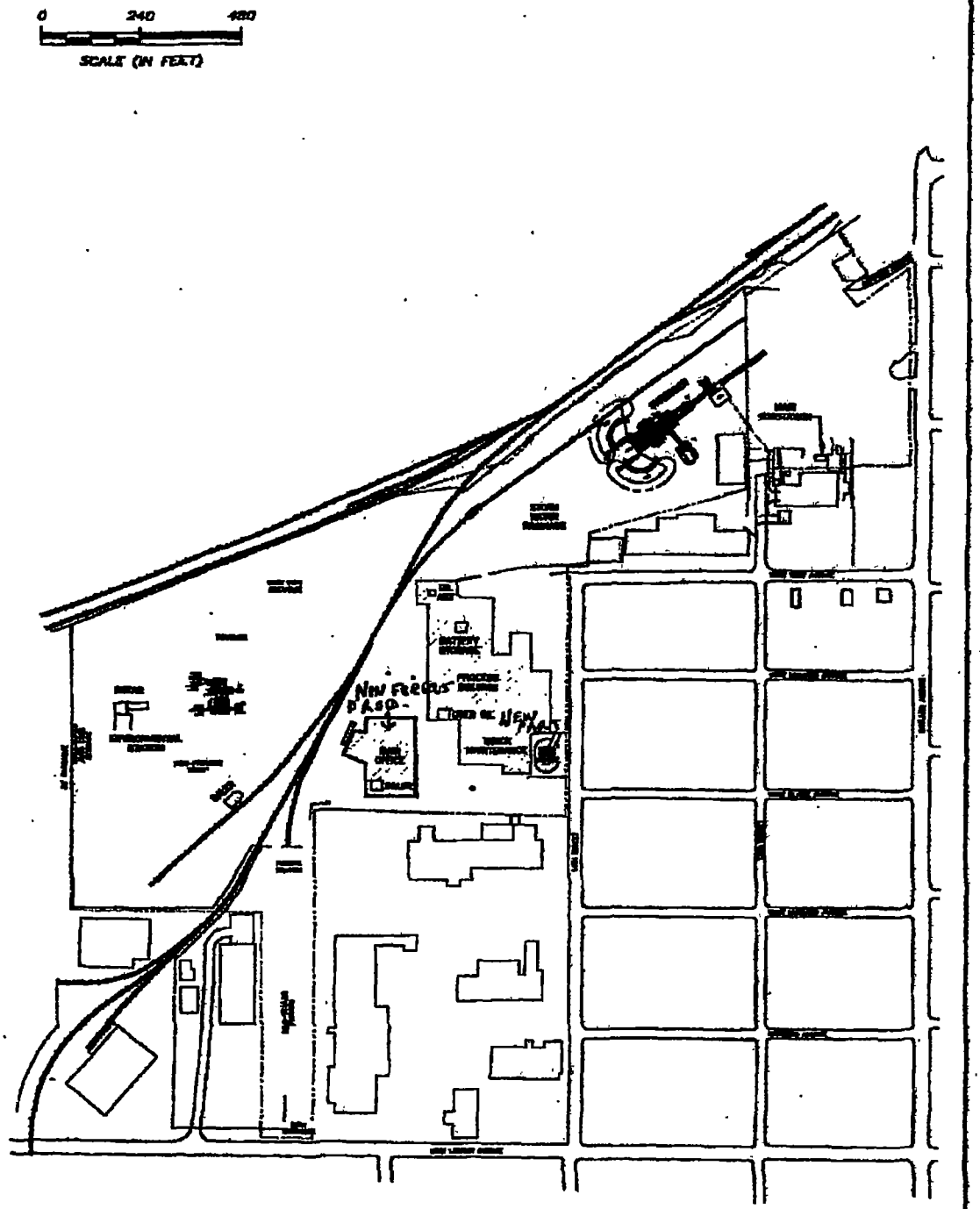
CAS#: 7664939

Name: Sulfuric acid

Storage Locations:

1) In lead-acid batteries in the NW corner of Process building, in new parts storage, and in non-ferrous production area
2)
3)
4)

SITE PLAN



CADD Review	ERM.	STURGIS IRON & METAL 1514 LUSHER AVENUE ELKHART, INDIANA	CHK'D BY:
DRAWN BY: DWB			00:55:30
Date Drawn/Rev'd 10/27/05-12/19/05		Environmental Resources Management	FIGURE 1

2005 Tier II Report

NONCONFIDENTIAL LOCATION INFORMATION

State Form 52015 (5-95)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instructions found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2006 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 17013 (*From Mailing Label*)
Name Elkhart Metals
Street Address 1514 Lusher Ave. City Elkhart
County Elkhart ZIP 46514 E-mail elkchuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 017446454
OFFICIAL USE ONLY (*DO NOT FILL*)
Date Received

Owner/Operator Name (*Mailing Address*)

Name Sturgis Iron & Metal Phone (269) 651-7851
Mailing Address 2110 S. Centerville Rd Sturgis, MI 49091

Emergency Contact

Name Chuck Kelley Title Operations Mgr.
Phone (574) 295-0155 24-Hr. Phone (269) 463-1609
Name Dale McDougle Title Dir. of Operations
Phone (574) 361-9944 24-Hr. Phone (574) 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (*Nonconfidential*) Storage Location	Optional
CAS 7664-93-9 ☐ Trade Secret Chem. Name Sulfuric Acid Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☒ EHS EHS Name Sulfuric Acid	☐ Fire ☐ Sudden Release of pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	03 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA	☐
CAS 7439-92-1 ☐ Trade Secret Chem. Name LEAD Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name	☐ Fire ☐ Sudden Release of pressure ☐ Reactivity ☐ Immediate (acute) ☒ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR — Chuck Kelley — 1-2-07
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 82015 (6-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31 2005 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1705 (From Mailing Label)
Name Elkhart Metals
Street Address 1514 N. Lusher Ave City Elkhart
County Elkhart ZIP 46514 E-mail elk.chuck@sturgisiron.net
SIC Code 5015 Dunn & Bradstreet 017446454

OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (Mailing Address)

Name Sturgis Iron & Metal Phone (269) 651-7851
Mailing Address 3160 S. Centreville Rd Sturgis MI 49091

Emergency Contact

Name Chuck Kelley Title Operations Mgr.
Phone 574 295-0155 24-Hr. Phone (850) 463-1607
Name Dale Mc Dougle Title Dir. of Operations
Phone 574 361-9944 24-Hr. Phone 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS / Chem. Name Diesel ☐ Trade Secret Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	06 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	At fueling Station	☐
CAS / Chem. Name Oils ☐ Trade Secret Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	A D	1 1	4 4	Located at truck maintenance, process building, shear, baler, environmental station, main substation, shredder	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR. — Name and official title of owner/operator OR authorized representative
Chuck Kelley — Signature
1-2-07 — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of site coordinates/abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 82016 (5-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2006 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1703 *(From Mailing Label)*
Name ELKHART METALS
Street Address 1514 LUSHER AVE City ELKHART
County ELKHART ZIP 46514 E-mail elkchuck@sturgisiron.net
SIC Code 5015 Dun & Bradstreet 017446454
OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (Mailing Address)

Name STURGIS IRON & METAL Phone (269) 651-7851
Mailing Address 216 D S. CENTERVILLE RD, STURGIS MI 49091

Emergency Contact

Name CHUCK KELLEY Title OPERATIONS MGR
Phone 574 295-0155 24-Hr. Phone 269 463-1604
Name DALE MCDOUGLE Title DIR. OF OPERATIONS
Phone 574 361-9944 24-Hr. Phone 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS 7782-44-7 ☐ Trade Secret Chem. Name OXYGEN Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☒ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	L	2	4	PROCESS BUILDING AND CAST IRON BREAKAGE AREA	☐
CAS 8006-61-9 ☐ Trade Secret Chem. Name GASOLINE Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	LOCATED AT THE FUELING STATION	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR — Chuck Kelley — 1-2-07
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of site contingency abbreviations
☐ I have attached a description of drills and other safeguards

2004 Tier II Report

NONCONFIDENTIAL LOCATION INFORMATION

State Form 52016 (6-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instructions found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2006 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific information by Chemical

Facility Identification

Facility ID # 170-3 (From Mailing Label)
Name: Elkhart Metals
Street Address: 1514 Lusher Ave. City: Elkhart
County: Elkhart ZIP: 46514 E-mail: elkchuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 01-744-9454
OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (Mailing Address)

Name: Sturgis Iron & Metal Phone: (269) 651-7851
Mailing Address: 2110 S Centerville Rd Sturgis, MI 49091

Emergency Contact:

Name: Chuck Kelley Title: Operations Mgr
Phone: (574) 295-0155 24-Hr. Phone: (269) 463-1604
Name: Dale McDougle Title: Dir. of Operations
Phone: (574) 361-9944 24-Hr. Phone: (574) 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS: 7664-93-9 ☐ Trade Secret Chem. Name: Sulfuric Acid Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☒ EHS EHS Name: Sulfuric Acid	☐ Fire ☐ Sudden Release of pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	03 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA.	☐
CAS: 7439-92-1 ☐ Trade Secret Chem. Name: LEAD Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden Release of pressure ☐ Reactivity ☐ Immediate (acute) ☒ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR — Chuck Kelley — 1-2-07
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of site-specific abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 82015 (5-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found at the first page before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2014 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1705 (From Mailing Label)
Name Elkhart Metals
Street Address 1514 W. Lusher Ave City Elkhart
County Elkhart ZIP 46514 E-mail elk.chuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 017441464
OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (Mailing Address)

Name Sturgis Iron & Metal Phone 269 651-7851
Mailing Address 2100 S. Centreville Rd Sturgis MI 49091

Emergency Contact

Name Chuck Kelley Title Operations Mgr.
Phone 574 295-0155 24-Hr. Phone 269 463-1609
Name Dale Mc Dougle Title Dir. of Operations
Phone 574 361-9944 24-Hr. Phone 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS # ☐ Trade Secret Chem. Name Diesel Check all that Apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	At fueling Station	☐
CAS # ☐ Trade Secret Chem. Name Oils Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	A D	1 1	4 4	Located at truck maintenance, process building, shear, baler, environmental station, main substation, shredder	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR. (Name and official title of owner/operator OR authorized representative) | Chuck Kelley (Signature) | 1-2-07 (Date signed)

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 52016 (5-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instructions found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2004 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1703 (*From Mailing Label*)
Name ELKHART METALS
Street Address 1514 LUSHER AVE City ELKHART
County ELKHART ZIP 46514 E-mail elchuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 01-744-6454

OFFICIAL USE ONLY (*DO NOT FILL*)
Date Received

Owner/Operator Name (*Mailing Address*)

Name STURGIS IRON & METAL Phone (269) 651-7851
Mailing Address 2160 S. CENTERVILLE RD, STURGIS MI 49091

Emergency Contact

Name CHUCK KELLEY Title OPERATIONS MGR
Phone 574 215-0165 24-Hr. Phone 269 463-1604
Name DALE MCDOUGLE Title DIR. OF OPERATIONS
Phone 574 361-9944 24-Hr. Phone 574 361-9944

Chemical Description	Physical and Health Hazards		Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (*Nonconfidential*) Storage Location	Optional
CAS 7782-44-7 ☐ Trade Secret Chem. Name OXYGEN Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☒ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)		04 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	L	2	4	PROCESS BUILDING AND CAST IRON BREAKAGE AREA	☐
CAS 8006-61-9 ☐ Trade Secret Chem. Name GASOLINE Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)		04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	LOCATED AT THE FUELING STATION	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3, And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR — Chuck Kelley — 1-2-05
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of fillers and other safeguards

2003 Tier II Report

NONCONFIDENTIAL LOCATION INFORMATION

State Form 82015 (6-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2006 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific information by Chemical

Facility Identification

Facility ID # 17023 (From Mailing Label)
Name: Elkhart Metals
Street Address: 1514 Lusher Ave City: Elkhart
County: Elkhart ZIP: 46514 E-mail: elk.chuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 017446454
OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (Mailing Address)

Name: Sturgis Iron & Metal Phone: (269) 651-7851
Mailing Address: 2110 S. Centerville Rd Sturgis, MI 49091

Emergency Contact:

Name: Chuck Kelley Title: Operations Mgr
Phone: (574) 295-0155 24-Hr. Phone: 269 463-1604
Name: Dale McDougle Title: Dir. of Operations
Phone: (574) 361-9944 24-Hr. Phone: (574) 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS: 7664-93-9 ☐ Trade Secret Chem. Name: Sulfuric Acid Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☒ Gas EHS EHS Name: Sulfuric Acid	☐ Fire ☐ Sudden Release of pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	03 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA.	☐
CAS: 7439-92-1 ☐ Trade Secret Chem. Name: LEAD Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas EHS EHS Name:	☐ Fire ☐ Sudden Release of pressure ☐ Reactivity ☐ Immediate (acute) ☒ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR — Chuck Kelley — 1-2-07
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 62015 (5-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2001 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID #: 17015 (From Mailing Label)
Name: Elkhart Metals
Street Address: 1514 N. Lusher Ave City: Elkhart
County: Elkhart ZIP: 46514 E-mail: elk.chuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 017416454
OFFICIAL USE ONLY (DO NOT FILL)
Date Received:

Owner/Operator Name (Mailing Address)

Name: Sturgis Iron & Metal Phone: 269 651-7151
Mailing Address: 210 S. Centerville Rd Sturgis MI 49091

Emergency Contact:

Name: Chuck Kelley Title: Operations Mgr.
Phone: 574 295-0155 24-Hr. Phone: 260 463-1609
Name: Dale Mc Dougle Title: Dir. of Operations
Phone: 574 361-9944 24-Hr. Phone: 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS: / Chem. Name: Diesel ☐ Trade Secret. Check all that apply: ☐ Fire ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS. EHS Name:	☒ Fire; ☐ Sudden Release of pressure; ☐ Reactivity; ☒ Immediate (acute); ☐ Delayed (chronic)	05 Max. Daily Amount (Code); 04 Avg. Daily Amount (Code); 365 No. of Days On-site (Days)	B	1	4	At fueling Station	☐
CAS: ___ Chem. Name: Oils ☐ Trade Secret. Check all that apply: ☐ Fire ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS. EHS Name:	☒ Fire; ☐ Sudden Release of pressure; ☐ Reactivity; ☒ Immediate (acute); ☐ Delayed (chronic)	05 Max. Daily Amount (Code); 04 Avg. Daily Amount (Code); 365 No. of Days On-site (Days)	A D	1 1	4 4	Located at truck maintenance, process building, shear, baler, environmental station, main substation shredder	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR — Chuck Kelley — 1-2-02
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 62015 (6-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form.

Reporting Period: From January 1 to December 31, 2005

☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1703 *(From Mailing Label)*

Name ELKHART METALS

Street Address 1514 LUSHER AVE City ELKHART

County ELKHART ZIP 46514 E-mail elichuck@sturgisiron.net

SIC Code: 5015 Dun & Bradstreet 079466459

OFFICIAL USE ONLY *(DO NOT FILL)*

Date Received

Owner/Operator Name *(Mailing Address)*

Name STURGIS IRON & METAL Phone 269 651-7851

Mailing Address 2160 S. CENTERVILLE RD, STURGIS MI 49091

Emergency Contact

Name CHUCK KELLEY Title OPERATIONS MGR

Phone 574 295-0155 24-Hr. Phone 269 463-1604

Name DALE MCDOUGLE Title DIR. OF OPERATIONS

Phone 574 361-9944 24-Hr. Phone 574 361-9944

Chemical Description	Physical and Health Hazards		Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (*Nonconfidential*) Storage Location	Optional
CAS 7782-44-7 ☐ Trade Secret Chem. Name OXYGEN Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒	Fire	04 Max. Daily Amount (Code)	L	2	4	PROCESS BUILDING AND	☐
	☒	Sudden Release of pressure	03 Avg. Daily Amount (Code)				CAST IRON BREAKAGE AREA	
	☐	Reactivity	365 No. of Days On-site (Days)					
	☒	Immediate (acute)						
	☐	Delayed (chronic)						
CAS 8006-61-9 ☐ Trade Secret Chem. Name GASOLINE Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒	Fire	04 Max. Daily Amount (Code)	B	1	4	LOCATED AT THE FUELING	☐
	☐	Sudden Release of pressure	04 Avg. Daily Amount (Code)				STATION	
	☐	Reactivity	365 No. of Days On-site (Days)					
	☒	Immediate (acute)						
	☐	Delayed (chronic)						

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3 And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR — Chuck Kelley — 1-2-07

Name and official title of owner/operator OR authorized representative — Signature — Date Signed

Optional Attachments

☐ I have attached a site plan

☐ I have attached a list of facility coordinate abbreviations

☐ I have attached a description of dikes and other safeguards

2002 Tier II Report

NONCONFIDENTIAL LOCATION INFORMATION

State Form 52015 (5-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instructions found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2002 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific information by Chemical

Facility Identification

Facility ID # 1703 (From Mailing Label)
Name: Elkhart Metals
Street Address: 1514 Lusher Ave. City: Elkhart
County: Elkhart ZIP: 46514 E-mail: elkchuck@sturgisiron.net
SIC Code: 5015 Dunn & Bradstreet: 017446454

OFFICIAL USE ONLY (DO NOT FILL)
Date Received:

Owner/Operator Name (Mailing Address)

Name: Sturgis Iron & Metal Phone: (269) 651-7851
Mailing Address: 2160 S. Centerville Rd Sturgis, MI 49091

Emergency Contact

Name: Chuck Kelley Title: Operations Mgr
Phone: (574) 295-0155 24-Hr. Phone: 269 463-1604
Name: Dale McDougle Title: Dir. of Operations
Phone: (574) 361-9944 24-Hr. Phone: (574) 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS 7664-93-9 ☐ Trade Secret Chem. Name: Sulfuric Acid Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☒ EHS EHS Name: Sulfuric Acid	☐ Fire ☐ Sudden Release of pressure ☒ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	03 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA.	☐
CAS 7439-92-1 ☐ Trade Secret Chem. Name: LEAD Check all that apply: ☐ Pure ☐ Mix ☒ Solid ☐ Liquid ☐ Gas ☐ EHS EHS Name:	☐ Fire ☐ Sudden Release of pressure ☐ Reactivity ☐ Immediate (acute) ☒ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	R	1	4	IN LEAD-ACID BATTERIES, LOCATED IN THE NORTHWEST CORNER OF PROCESS BUILDING, IN NEW PARTS STORAGE, AND IN THE NON-FERROUS PRODUCTION AREA	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3.
And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY / OPERATIONS MGR — Name and official title of owner/operator OR authorized representative
Chuck Kelley — Signature
1-2-07 — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 52016 (5-05)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2007 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID #: 17055 (From Mailing Label)
Name: Elkhart Metals
Street Address: 1514 N. Usher Ave City: Elkhart
County: Elkhart ZIP: 46514 E-mail: elk.chuck@sturgisiron.net
SIC Code: 5015 Dun & Bradstreet: 017416454

OFFICIAL USE ONLY (DO NOT FILL)
Date Received:

Owner/Operator Name (Mailing Address)

Name: Sturgis Iron & Metal Phone: 269 651-7351
Mailing Address: 3140 S. Centerville Rd Sturgis MI 49091

Emergency Contact

Name: Chuck Kelley Title: Operations Mgr.
Phone: 574 295-0155 24-Hr. Phone: 260 463-1609
Name: Dale Mc Dougle Title: Dir. of Operations
Phone: 574 361-9944 24-Hr. Phone: 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS: ☐ Trade Secret Chem. Name: Diesel Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	At fueling Station	☐
CAS: ☐ Trade Secret Chem. Name: Oils Check all that apply: ☐ Pure ☒ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name:	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	05 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	A D	1 1	4 4	Located at truck maintenance, process building, shear, baler, environmental station, main substation, Shredder	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3. And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR — Chuck Kelley — 1-2-07
Name and official title of owner/operator OR authorized representative — Signature — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of the site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

NONCONFIDENTIAL LOCATION INFORMATION

State Form 52016 (5-03)
Indiana Department of Environmental Management
Indiana Emergency Response Commission

Read instruction found after this form before completing this form.

Important: Read all instructions before completing form. | Reporting Period: From January 1 to December 31, 2002 | ☐ Check if information below is identical to the information submitted last year

Tier II EMERGENCY AND HAZARDOUS CHEMICAL INVENTORY

Specific Information by Chemical

Facility Identification

Facility ID # 1703 (From Mailing Label)
Name ELKHART METALS
Street Address 1514 LUSHER AVE City ELKHART
County ELKHART ZIP 46514 E-mail ellchuck@sturgisiron.net
SIC Code 5015 Dunn & Bradstreet 01-744-6454

OFFICIAL USE ONLY (DO NOT FILL)
Date Received

Owner/Operator Name (Mailing Address)

Name STURGIS IRON & METAL Phone (269) 651-7851
Mailing Address 216 D S. CENTERVILLE RD. STURGIS MI 49091

Emergency Contact

Name CHUCK KELLEY Title OPERATIONS MGR
Phone 574 295-0155 24-Hr. Phone 269 463-1604
Name DALE MCDOUGLE Title DIR. OF OPERATIONS
Phone 574 361-9944 24-Hr. Phone 574 361-9944

Chemical Description	Physical and Health Hazards	Inventory	Container Type	Pressure	Temperature	Storage Codes and Locations (Nonconfidential) Storage Location	Optional
CAS 7782-44-7 ☐ Trade Secret Chem. Name OXYGEN Check all that Apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☒ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (Code) 03 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	L	2	4	PROCESS BUILDING AND CAST IRON BREAKAGE AREA	☐
CAS 8006-61-9 ☐ Trade Secret Chem. Name GASOLINE Check all that apply: ☐ Pure ☐ Mix ☐ Solid ☒ Liquid ☐ Gas ☐ EHS EHS Name	☒ Fire ☐ Sudden Release of pressure ☐ Reactivity ☒ Immediate (acute) ☐ Delayed (chronic)	04 Max. Daily Amount (Code) 04 Avg. Daily Amount (Code) 365 No. of Days On-site (Days)	B	1	4	LOCATED AT THE FUELING STATION	☐

Certification: *Read and sign after completing all sections*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in pages 1 through 3 And that, based on my inquiry of those individuals responsible for obtaining the information, I believe the submitted information is true, accurate, and complete.

CHUCK KELLEY/OPERATIONS MGR. — Name and official title of owner/operator OR authorized representative
Chuck Kelly — Signature
1-2-02 — Date signed

Optional Attachments

☐ I have attached a site plan
☐ I have attached a list of site coordinate abbreviations
☐ I have attached a description of dikes and other safeguards

EXHIBIT 8

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

Volatile Organic Analysis

Site Name: Sturgis Metals
Location: *Elkhart, IN Elkhart Co*
Date Sampled: 7-Sep-06
Date Reported. 28-Sep-06
Lab: PACE

Automotive FLUFF

Method SW846-8260B

UNITS **ug/kg**

Sample # Lab	Sample # IDEM	Type/ID#	Date of Analysis	Acetone	2-butanone	4-methyl-2-pentanone	dichlorodifluorimethane	ethylbenzene	fluorotrichloromethane	styrene	isopropylbenzene	Naphthalene	Tetrachloroethene	Toluene	xylene, m + p	xylene, o
			D L >	1100	1100	1100	230	230	230	230	230	230	230	230	460	230
RISC Default Industrial Table				**370,000**	**na**	**73,000**	**na**	**13,000**	**na**	**550,000**	**na**	**170,000**	**640**	**240,000**	**170,000**	**170,000**
875887-001	LQ3791	Auto-fluff composite	9/19/2006	1900	850(J)	580(J)	150(J,N)	500	37000(N)	1400	230(J)	1500(N)	[illegible]	770	1100	1100
875887-002	LQ3792	Methanol Trip Blank	9/19/2006													

* BLANK (Type Indicated)
** FIELD DUPLICATE

Empty Box Indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table
J = Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated
N = Spiked sample recovery not within control limits Therefore, results estimated
* = Precision not within control limits Therefore, the results estimated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

Semi-Volatiles

Site Name: Sturgis Metals
Location: Elkhart, IN Elkhart Co
Date Sampled: 7-Sep-06
Date Reported: 28-Sep-06
Lab: PACE

Automotive FLUFF

Method: SW846-8270C

UNITS **ug/kg**

Sample #		Type/ID#	Date of	bis(2-ethylhexyl)phthalate	butylbenzylphthalate	di-n-octylphthalate	fluoranthene	phenanthrene	pyrene
Lab	IDEM		Analysis						
			D L >	11,000	11000	11000	11000	11000	11000
RISC Default Industrial Table				**980,000**	**310,000**	**na**	**880,000**	**170,000**	**570,000**
875887-001	LQ3791[D]	Auto-fluff composite	9/18/2006	[88000(N)]	[9000(N)]	[8000(N)]	[4800(N)]	[3900(N)]	[35000J]

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table
J = Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated.
N = Spiked sample recovery not within control limits Therefore, results estimated.
[D] = Surrogates diluted out of range, Surrogate recovery could not be calculated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

Toxicity Characteristic Leachate Procedure

Volatiles

Site Name: Sturgis Metals
Location: Elkhart, IN Elkhart Co.
Date Sampled: 7-Sep-06
Date Reported. 28-Sep-06
Lab: PACE

Automotive FLUFF

Method: SW846-8260B

Note All volatiles below the limit of detection
Limit of detection ranged from 0 12 - 0.25 mg/L
UNITS **mg/L**

Sample #		Type/ID#		Tetrachloroethene
Lab	IDEM	D L >		0 005
RISC Default Industrial Table				
875887-001	LQ3791	Auto-fluff composite		[illegible]0.0026[illegible]

* BLANK (Type indicated)
** FIELD DUPLICATE
Empty Box indicates NON-DETECTABLE
NR = NOT RUN
[illegible] Concentration detected equal to or greater than the method detection limit but less than the reporting limit. Therefore, results estimated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

Toxicity Characteristic Leachate Procedure

Metals

Site Name:	Sturgis Metals
Location:	Elkhart, IN Elkhart Co
Date Sampled:	7-Sep-06
Date Reported:	28-Sep-06
Lab:	PACE

Automotive FLUFF

Method SW846-6010B, SW846-7470A
UNITS. **mg/L**

Sample #		Type/ID#	Percent Solids	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
Lab	IDEM	D L >		1	1	0 25	0 25	1	0 0002	1	0 25
TCLP - Type III Waste Threshold				**0.5**	**10**	**0 1**	**0 5**	**0 5**	**0 02**	**0.1**	**0.5**
875887-001	LQ3791	Auto-fluff composite	87 6		0.95B	0.084B		0.39B	0.00015B		

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

Note Automotive Fluff is a mixed heterogeneous Automotive Fluff / Automotive Scrap Waste

B = Analyte detected between the method detection limit and the reporting limit Therefore, results estimated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

RCRA Metals

Site Name: Sturgis Metals
Location: Elkhart, IN Elkhart Co
Date Sampled: 7-Sep-06
Date Reported: 28-Sep-06
Lab. PACE

Automotive FLUFF

Method SW846-6010B, SW846-7471A
UNITS. **mg/kg**

Sample #		Type/ID#	Percent	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
Lab	IDEM	D L >	Solids	11	0 57	2 9	0 57	5 7	0 23	11	1 1
RISC Default Industrial Table			**na**	**5 8**	**1,000**	**77**	**120**	**230**	**32**	**53**	**87**
IDEM 20x Rule Potential Exceedance			**na**	**100**	**2,000**	**20**	**100**	**100**	**4**	**20**	**100**
875887-001	LQ3791	Auto-fluff composite	87 6	**12**	**550**	**25**	**240**	**1200**	**4.8**		5 6

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table or 20x rule for the potential to exceed TCLP
Precision not within control limits Therefore, results estimated
note Total Cd, Cr and Pb are of concern since these metals exceed the 20x rule

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

PCBs

Site Name: Sturgis Metals
Location: Elkhart, IN Elkhart Co
Date Sampled: 7-Sep-06
Date Reported: 28-Sep-06
Lab: PACE

Automotive FLUFF

Method: SW846-8082

UNITS. **ug/kg**

Sample #		Type/ID#	Date of	Aroclor 1242	Aroclor 1254	Total PCBs
Lab	IDEM		Analysis			
			D.L.>	2300	2300	2300
RISC Default Industrial Table				**5,300**	**5,300**	**5,300**
875887-001	LQ3791[D]	Auto-fluff composite	9/14/2006	**47,000**	**9,400**	**57,000**

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

[D] = Surrogates diluted out of range. Surrogate recovery could not be calculated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

Toxicity Characteristic Leachate Procedure

Semi-Volatiles

Automotive FLUFF

Site Name:	Sturgis Metals
Location	Elkhart, IN Elkhart Co
Date Sampled:	7-Sep-06
Date Reported:	28-Sep-06
Lab:	PACE

Method SW846-8270C

Note All semivolatiles below the limit of detection
Limit of detection ranged from 0 12 - 0 25 mg/L
UNITS: **mg/L**

Sample #		Type/ID#	
Lab	IDEM	D L >	
RISC Default Industrial Table			
875887-001	LQ3791	Auto-fluff composite	

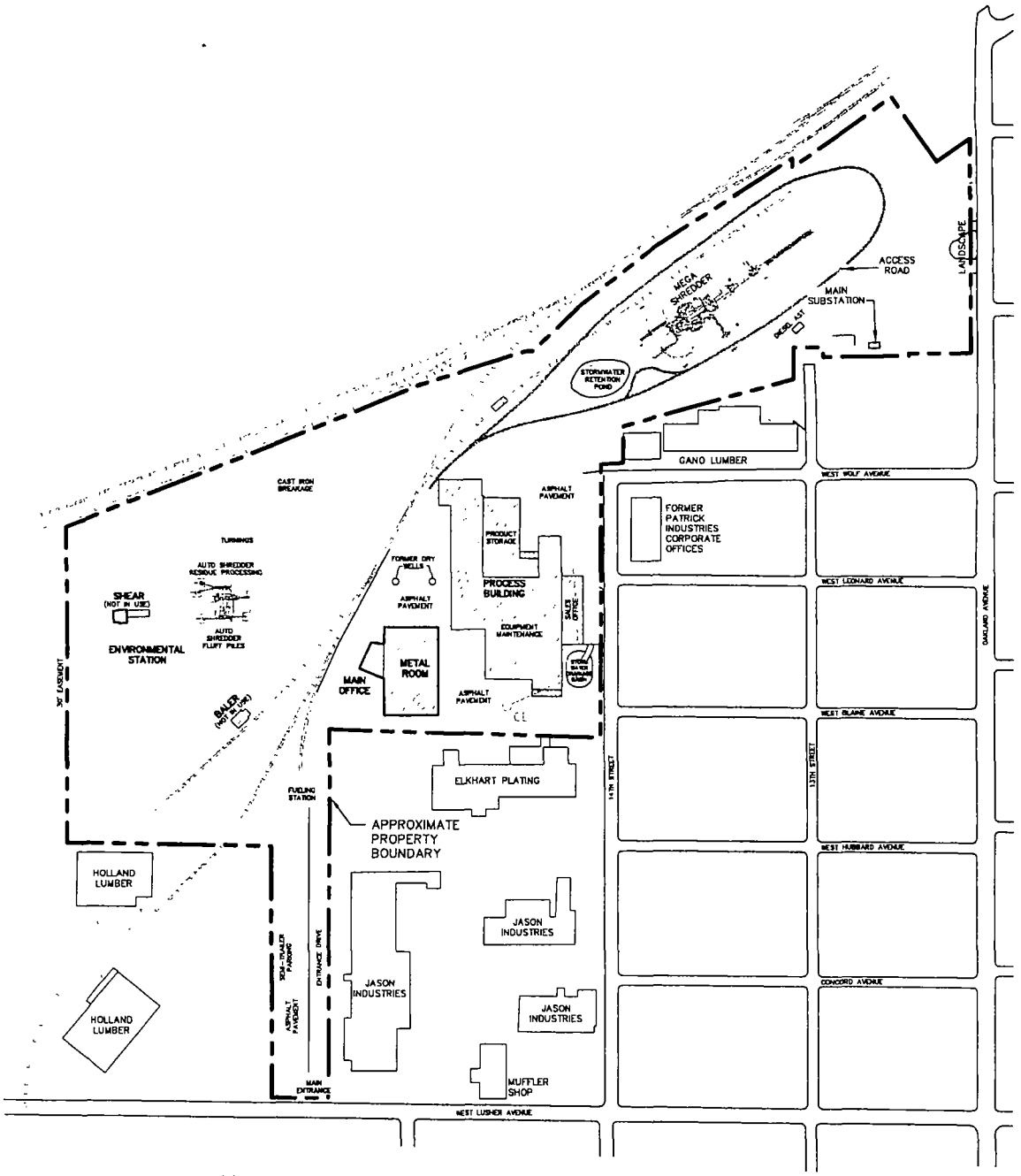
* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

EXHIBIT 9

R:\CADD\Clnt\Q-T\Sturgis Iron and Metal\0080520\Elkhart Lusher Ave\0080520-01 ELKHART LUSHER AVE.dwg, SITE PLAN 3/24/2008 3:08:28 PM FAK

SITE MAP



CADD Review FAK	ERM.	**STURGIS IRON & METAL** 1514 LUSHER AVENUE ELKHART, INDIANA	CHK'D BY CAH
DRAWN BY RMK			0080520
Date Drawn/Rev'd 2/27/08-3/24/08		Environmental Resources Management	FIGURE 2

Volatiles

Site Name. Sturgis Metals
Location· Elkhart, IN Elkhart Co
Date Sampled: 7-Sep-06
Date Reported. 5-Oct-06
Lab: PACE

SOIL

Method SW846-8260B

UNITS **ug/kg**

Sample # Lab	Sample # IDEM	Type/ID#	Date of Analysis	Fluorodichloromethane	4-Methyl-2-pentanone	Styrene	Toluene	Acetone	2-Butanone	Benzene	1 1-Dichloroethane	cis-1,2-Dichloroethene
			D L >	32	54-160	2 2-5.4	5 4-16	54-57	54	5 4	5 4	5 4
		RISC Default Induastrial Table		**na**	**73,000**	**550,000**	**240,000**	**370,000**	**na**	**350**	**58,000**	**6,800**
875884-01	LQ3806[a]	Soil Composite Shredder	9/12/06									
875883-03	LQ3808	Soil Composite Equipment Decommissioning Area	9/12/06					19 U				
875884-04	LQ3809	Soil Composite Metal Turnings Pile Footprint	9/12/06									
875884-05	LQ3810[a]	Soil Composite· Old shredder/car crusher area	9/12/06									
875887-02	LQ3792	Methanol Trip Blank	9/19/06									

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box Indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table
J = Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated
N = Spiked sample recovery not within control limits Therefore, results estimated
[a] = Low internal standard response for LQ3806, LQ3806MS, LQ3806MSD and LQ3810 Therefore, results estimated, biased high

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

RCRA Metals

Site Name: Sturgis Metals
Location. Elkhart, IN Elkhart Co
Date Sampled. 7-Sep-06
Date Reported 5-Oct-06
Lab: PACE

SOIL

Methods SW846-6020 and SW846-7471A (mercury only)

UNITS mg/Kg

Sample #		Type/ID#	Percent	As	Ba	Cd	Cr	Pb	Hg	Se	Ag
Lab	IDEM	D L >	Solids	0 32-0 39	0 32-2	0 11-0 13	0 32-0 39	0 27-0 33	0 11-0 22	0 54-0 65	0 32-0 39
		RISC Default Industrial Table	na	5 8	10,000	77	120	230	32	53	87
875884-01	LQ3806	Soil Composite Shredder	76 4	**12**	770	14	**2501**	**600**	2 1	1 6	1 4
875883-03	LQ3808	Soil Composite Equipment Decommissioning Area	86 2	**13**	210	5 9	**200**	**300**	2	0.83	3 2
875884-04	LQ3809	Soil Composite Metal Turnings Pile Footprint	92 3	**25**	33	0 83	**1700**	49	0 35	[illegible]	1 5
875884-05	LQ3810	Soil Composite Old shredder/car crusher area	92 8	**6.6**	140	0 79	24	38	0 73	[illegible]	[illegible]

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table

Note LQ3806 - MS/MSD for Cr, Ba, Pb and Hg Sample results greater than 4 x spike amount. LCS for analytes was acceptable Therefore, results for Cr, Ba, Pb and Hg acceptable for screen values

[illegible] = Precision not within control limits Therefore, results estimated

J = Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

PCBs

Site Name: Sturgis Metals
Location: Elkhart, IN Elkhart Co
Date Sampled 7-Sep-06
Date Reported: 5-Oct-06
Lab: PACE

SOIL

Method SW846-8082

UNITS **ug/kg**

Sample #		Type/ID#	Date of	Aroclor 1242	Aroclor 1254	Total PCBs
Lab	IDEM		Analysis			
			D L.>	43 - 780	43 - 2300	43 - 2300
RISC Default Industrial Table				**5,300**	**5,300**	**5,300**
875884-01	LQ3806	Soil Composite Shredder	9/20/06	**12,000**	2,500	**15,000**
875883-03	LQ3808[D]	Soil Composite Equipment Decommissioning Area	9/19/06		**5,600**	**5,600**
875884-04	LQ3809	Soil Composite Metal Turnings Pile Footprint	9/20/06	290	500	790
875884-05	LQ3810	Soil Composite Old shredder/car crusher area	9/19/06	210	500	710

* BLANK (Type indicated)
** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table
[D] = Surrogates diluted out of range Surrogate recovery could not be calculated

Semi-Volatile Organic Analysis

Site Name	Sturgis Metals
Location	Elkhart, IN Elkhart Co
Date Sampled	7-Sep-06
Date Reported	5-Oct-06
Lab	PACE

SOIL

Method SW846-8270C

UNITS **ug/kg**

Sample # Lab	Sample # IDEM	Type/ID#	Date of Analysis	Benzo(a)anthracene	Benzo(a)pyrene	Benzo(b)fluoranthene	Benzo(k)fluoranthene	bis(2-Ethylhexyl)phthalate	Butylbenzylphthalate	Chrysene	Di-n-octylphthalate	Fluoranthene	Phenanthrene	Pyrene	Phenol
			DL >	1300-27000	1300-27000	1300 27000	1300-27000	1300-17000	1300-27000	1300	1300	1300-27000	1300-27000	1300-17000	1400-27000
RISC Default Industrial Table				**15,000**	**11,500**	**16,000**	**39,000**	**980 000**	**310,000**	**25,000**	**2,000,000**	**680,000**	**170,000**	**970,000**	**160,000**
875884-01	LQ3806	Soil Composite Shredder	9/18/06	310(J,N)	330(J)	[illegible]	[illegible]	7900	2000	[illegible]	[illegible]	[illegible]	340(J,N)	890(J)	
875883-03	LQ3808[D,K]	Soil Composite Equipment Decommissioning Area	9/18/06			[illegible]		[illegible]						4600(J,K)	
875884-04	LQ3809	Soil Composite Metal Turnings Pile Footprint	9/18/06					1400					190(J)	180(J)	4900
875884-05	LQ3810[D,K]	Soil Composite Old shredder/car crusher area	9/18/06	5700(J,K)	5200(J,K)	15600(J,K)	4600(J,K)	57000(K)				10000(K)	5900(J,K)	13000(J,K)	

* BLANK (Type indicated)

** FIELD DUPLICATE

Empty Box indicates NON-DETECTABLE

NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table

J = Precision not within control limits Therefore, results estimated

J = Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated

N = Spiked sample recovery not within control limits Therefore, results estimated

K = Analyte/surrogate detection limit may be elevated to to the presence of interfering analyte

[D] = Surrogates diluted out of range Surrogate recovery could not be calculated

NOT A REPORT - OLQ CHEMISTRY WORKSHEET ONLY - REFER TO ATTACHED MEMO

TPH

Site Name: Sturgis Metals
Location: Elkhart, IN Elkhart Co
Date Sampled. 7-Sep-06
Date Reported: 5-Oct-06
Lab: PACE

SOIL

Method SW846-M8015

UNITS **mg/kg**

Sample #		Type/ID#	Date of	TPH-GRO	Date of	TPH-DRO	TPH-ERO	
Lab	IDEM		Analysis		Analysis			
			D L >	11 to 13	D L >	33 to 3700	33 to 1900	
		RISC Default Industrial Table		330		1000	na	
875884-01	LQ3806	Soil Composite Shredder	9/12/06	5.9(J,N)	9/20/06	140(N*)	300(N*)	
875883-03	LQ3808	Soil Composite Equipment Decommissioning Area	9/12/06		9/20/06	**11,000**	23000	
875884-04	LQ3809	Soil Composite Metal Turnings Pile Footprint	9/12/06		9/20/06	330	550	
875884-05	LQ3810	Soil Composite Old shredder/car crusher area	9/12/06		9/20/06	**14,000**	39,000	

* BLANK (Type indicated)
** *FIELD DUPLICATE*

Empty Box indicates NON-DETECTABLE
NR = NOT RUN

BOLD = Exceeds RISC Default Industrial Table
J = Precision not within control limits Therefore, results estimated
J = Concentration detected equal to or greater than the method detection limit but less than the reporting limit Therefore, results estimated
N = Spiked sample recovery not within control limits Therefore, results estimated

e-Lab Analytical, Inc

3352 128th Avenue Holland, Michigan 49424-9263 (616) 399-6070 Fax (616) 399-6185

November 30, 2006

Sara Turrell
ERM, Inc
3352 128th Avenue
Holland, MI 49424

Tel: (616) 399-3500
Fax: (616) 399-3777

Re: Sturgis Iron & Metal Work Order : **0611442**

Dear Sara:

e-Lab Analytical, Inc received 3 samples on 11/21/06 for the analyses presented in the following report.

The analytical data provided relates directly to the samples received by e-Lab Analytical, Inc. and for only the analyses requested.

QC sample results for this data met laboratory specifications. Any exceptions are noted in the Case Narrative, or noted with qualifiers in the report or QC batch information. Should this laboratory report need to be reproduced, it should be reproduced in full unless written approval has been obtained from e-Lab Analytical, Inc. The total number of pages in this report is 9.

If you have any questions regarding this report, please feel free to contact me.

Sincerely,

Tom Beamish

Electronically approved by Tom Beamish

Tom Beamish
Project Manager

Certificate No IL100452

-Lab Analytical, Inc

Date: *November 30, 2006*

CLIENT: ERM, Inc
Project: Sturgis Iron & Metal
Work Order: **0611442**

Work Order Sample Summary

Lab Samp ID	Client Sample ID	Matrix	Tag Number	Collection Date	Date Received	Hold
0611442-01	Baler Well	Water		11/21/2006 11:30	11/21/2006 03:50	☐
0611442-02	N.F. Well	Water		11/21/2006 11:40	11/21/2006 03:50	☐
0611442-03	Trip Blank	Water		11/21/2006	11/21/2006 03:50	☐

e-Lab Analytical, Inc

Date: *November 30, 2006*

CLIENT: ERM, Inc
Project: Sturgis Iron & Metal
Work Order: 0611442

Lab ID: 0611442-01A
Collection Date: 11/21/2006 11:30:00 AM
Client Sample ID: Baler Well
Matrix: WATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
VOLATILE ORGANIC COMPOUNDS			**EPA 8260**			Analyst **CW**
Trichloroethene	ND	1 0		µg/L	1	11/30/2006 8.31 00 AM

Lab ID: 0611442-02A
Collection Date: 11/21/2006 11:40:00 AM
Client Sample ID: N.F. Well
Matrix: WATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
VOLATILE ORGANIC COMPOUNDS			**EPA 8260**			Analyst **CW**
Trichloroethene	ND	1 0		µg/L	1	11/30/2006 8 03 00 AM

Lab ID: 0611442-03A
Collection Date: 11/21/2006
Client Sample ID: Trip Blank
Matrix: WATER

Analyses	Result	Report Limit	Qual	Units	Dilution Factor	Date Analyzed
VOLATILE ORGANIC COMPOUNDS			**EPA 8260**			Analyst **CW**
Trichloroethene	ND	1 0		µg/L	1	11/26/2006 3 13 00 AM

Qualifiers:

ND - Not Detected at the Reporting Limit
J - Analyte detected below quantitation limits
B - Analyte detected in the associated Method Blank
* - Value exceeds Maximum Contaminant Level
S - Spike Recovery outside accepted recovery limits
P - Dual Column results RPD > 40%
E - Value above quantitation range
H - Analyzed outside of Hold Time

e-Lab Analytical, Inc

CLIENT: ERM, Inc

ork Order: 0611442

Project: Sturgis Iron & Metal

Date: *Nov 30 2006*

QC BATCH REPORT

Batch ID **R44305** Instrument ID **VMS6** Method **EPA 8260**

MBLK Sample ID **VBLKW2-061125** Units **µg/L** Analysis Date **11/26/06 2:47**

Client ID Run ID **VMS6_061125B** SeqNo **693822** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	ND	1 0								
Surr 1,2-Dichloroethane-d4	*109 1*	0 10	*100*	0	*109*	*80-120*	0			
Surr 4-Bromofluorobenzene	*98 53*	0 10	*100*	0	*98 5*	*80-120*	0			
Surr Dibromofluoromethane	*99 48*	0 10	*100*	0	*99 5*	*80-120*	0			
Surr Toluene-d8	*101 3*	0 10	*100*	0	*101*	*80-120*	0			

LCS Sample ID **VLCSW2-061125** Units. **µg/L** Analysis Date **11/26/06 1:26**

Client ID Run ID **VMS6_061125B** SeqNo **693820** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	23 38	1 0	20	0	117	70-125	0			
Surr 1,2-Dichloroethane-d4	*105 5*	0 10	*100*	0	*106*	*70-120*	0			
Surr 4-Bromofluorobenzene	*105*	0 10	*100*	0	*105*	*75-120*	0			
Surr Dibromofluoromethane	*101 6*	0 10	*100*	0	*102*	*85-115*	0			
Surr Toluene-d8	*102*	0 10	*100*	0	*102*	*85-120*	0			

LCSD Sample ID **VLCSDW2-061124** Units **µg/L** Analysis Date **11/26/06 1:53**

Client ID Run ID **VMS6_061125B** SeqNo **693821** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	23.89	1 0	20	0	119	70-125	23 38	2 16	30	
Surr 1,2-Dichloroethane-d4	*104 9*	0 10	*100*	0	*105*	*70-120*	105 5	*0 532*	*30*	
Surr 4-Bromofluorobenzene	*105*	0 10	*100*	0	*105*	*75-120*	105	*0 00952*	*30*	
Surr Dibromofluoromethane	*101 4*	0 10	*100*	0	*101*	*85-115*	101 6	*0 197*	*30*	
Surr Toluene-d8	*101 2*	0 10	*100*	0	*101*	*85-120*	102	*0 768*	*30*	

MS Sample ID **0611475-02C MS** Units. **µg/L** Analysis Date **11/26/06 9:54**

Client ID Run ID. **VMS6_061125B** SeqNo **693839** Prep Date. DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	22 9	1 0	20	0	114	70-130	0			
Surr 1,2-Dichloroethane-d4	*106 4*	0 10	*100*	0	*106*	*70-130*	0			
Surr 4-Bromofluorobenzene	*104 5*	0 10	*100*	0	*104*	*70-130*	0			
Surr Dibromofluoromethane	*103*	0 10	*100*	0	*103*	*70-130*	0			
Surr Toluene-d8	*102 4*	0.10	*100*	0	*102*	*70-130*	0			

- Not Detected at the Reporting Limit
- Analyte detected below quantitation limits
- O - Referenced analyte value is > 4 times amount spiked
- S - Spike Recovery outside accepted recovery limits
- R - RPD outside accepted recovery limits
- P - Dual Column results percent difference > 40%
- B - Analyte detected in assoc Method Blank
- U - Analyzed for but not detected
- E - Value above quantitation range

CLIENT: ERM, Inc
Work Order: 0611442
ject: Sturgis Iron & Metal

QC BATCH REPORT

Batch ID **R44305** Instrument ID **VMS6** Method **EPA 8260**

MSD Sample ID **0611475-02C MSD** Units **µg/L** Analysis Date **11/26/06 10:20**

Client ID Run ID **VMS6_061125B** SeqNo **693840** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	22 11	1 0	20	0	111	70-130	22 9	3 51	30	
Surr 1,2-Dichloroethane-d4	*105 3*	0 10	*100*	0	*105*	*70-130*	106 4	*1 02*	*30*	
Surr 4-Bromofluorobenzene	*103 8*	0 10	*100*	0	*104*	*70-130*	104 5	*0 701*	*30*	
Surr Dibromofluoromethane	*103 6*	0 10	*100*	0	*104*	*70-130*	103	*0 61*	*30*	
Surr Toluene-d8	*101 7*	0 10	*100*	0	*102*	*70-130*	102 4	*0 676*	*30*	

The following samples were analyzed in this batch: 0611442-03A

`ND - Not Detected at the Reporting Limit
analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: ERM, Inc
Work Order: 0611442
ject: Sturgis Iron & Metal

QC BATCH REPORT

Batch ID **R44416** Instrument ID **VMS6** Method **EPA 8260**

MBLK Sample ID **VBLKW2-061129** Units **µg/L** Analysis Date **11/30/06 12:57**
Client ID Run ID **VMS6_061129B** SeqNo **695659** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	ND	1 0								
Surr 1,2-Dichloroethane-d4	*94 45*	0 10	*100*	0	*94 4*	*80-120*	0			
Surr 4-Bromofluorobenzene	*94 42*	0 10	*100*	0	*94 4*	*80-120*	0			
Surr Dibromofluoromethane	*97 76*	0 10	*100*	0	*97 8*	*80-120*	0			
Surr Toluene-d8	*98 03*	0 10	*100*	0	*98*	*80-120*	0			

LCS Sample ID **VLCSW2-061129** Units **µg/L** Analysis Date **11/29/06 23:37**
Client ID. Run ID **VMS6_061129B** SeqNo **695654** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	20 04	1 0	20	0	100	70-125	0			
Surr 1,2-Dichloroethane-d4	*92 43*	0 10	*100*	0	*92 4*	*70-120*	0			
Surr 4-Bromofluorobenzene	*98 53*	0 10	*100*	0	*98 5*	*75-120*	0			
Surr Dibromofluoromethane	*100 4*	0 10	*100*	0	*100*	*85-115*	0			
Surr Toluene-d8	*97 94*	0 10	*100*	0	*97 9*	*85-120*	0			

`D Sample ID **VLCSDW2-061129** Units **µg/L** Analysis Date **11/30/06 12:03**
Client ID Run ID **VMS6_061129B** SeqNo **695658** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	21 19	1 0	20	0	106	70-125	20 04	5 58	30	
Surr 1,2-Dichloroethane-d4	*92 97*	0 10	*100*	0	*93*	*70-120*	92 43	*0 583*	*30*	
Surr 4-Bromofluorobenzene	*99 25*	0 10	*100*	0	*99 2*	*75-120*	98 53	*0 728*	*30*	
Surr Dibromofluoromethane	*100 3*	0 10	*100*	0	*100*	*85-115*	100 4	*0 0897*	*30*	
Surr Toluene-d8	*97 8*	0 10	*100*	0	*97 8*	*85-120*	97 94	*0 143*	*30*	

MS Sample ID **0611284-11C MS** Units **µg/L** Analysis Date **11/30/06 8:58**
Client ID Run ID **VMS6_061129B** SeqNo **695684** Prep Date DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	22 7	1 0	20	0	114	70-130	0			
Surr 1,2-Dichloroethane-d4	*94 9*	0 10	*100*	0	*94 9*	*70-130*	0			
Surr 4-Bromofluorobenzene	*98 4*	0 10	*100*	0	*98 4*	*70-130*	0			
Surr Dibromofluoromethane	*104*	0 10	*100*	0	*104*	*70-130*	0			
Surr Toluene-d8	*98 97*	0 10	*100*	0	*99*	*70-130*	0			

`` - Not Detected at the Reporting Limit
.nalyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

CLIENT: ERM, Inc
Work Order: 0611442
Project: Sturgis Iron & Metal

QC BATCH REPORT

Batch ID: **R44416** Instrument ID **VMS6** Method **EPA 8260**

MSD Sample ID **0611284-11C MSD** Units **µg/L** Analysis Date **11/30/06 9:24**

Client ID Run ID **VMS6_061129B** SeqNo **695685** Prep Date: DF **1**

Analyte	Result	PQL	SPK Val	SPK Ref Value	%REC	Control Limit	RPD Ref Value	%RPD	RPD Limit	Qual
Trichloroethene	21 65	1 0	20	0	108	70-130	22 7	4 74	30	
Surr 1,2-Dichloroethane-d4	*94 35*	0 10	*100*	0	*94 4*	*70-130*	94 9	*0 581*	*30*	
Surr 4-Bromofluorobenzene	*98 94*	0 10	*100*	0	*98 9*	*70-130*	98 4	*0 547*	*30*	
Surr Dibromofluoromethane	*103 6*	0 10	*100*	0	*104*	*70-130*	104	*0 318*	*30*	
Surr Toluene-d8	*99 5*	0 10	*100*	0	*99 5*	*70-130*	98 97	*0 534*	*30*	

The following samples were analyzed in this batch: 0611442-01A 0611442-02A

- Not Detected at the Reporting Limit
- Analyte detected below quantitation limits
O - Referenced analyte value is > 4 times amount spiked
S - Spike Recovery outside accepted recovery limits
R - RPD outside accepted recovery limits
P - Dual Column results percent difference > 40%
B - Analyte detected in assoc Method Blank
U - Analyzed for but not detected
E - Value above quantitation range

QUALITY • INTEGRITY • SERVICE

☐ e-Lab Analytical, Inc.
10450 Stancliff Rd. #210
Houston, Texas 77099
(Tel) 281.530.5656
(Fax) 281.530.5887

Chain of Custody Form

____ of ____

The Chain of Custody is a Legal Document. All information must be completed accurately.

☒ e-Lab Analytical, Inc.
3352 128th Avenue
Holland, Michigan 4.
(Tel) 616.399.6070
(Fax) 616.399.6185

e-Lab Project Manager: TBB | e-Lab Work Order #: 06114G2

Customer Information		Project Information		Parameter/Method Request for Analysis	
Purchase Order		Project Name	STURGIS IRON & METAL	A	TCE
Work Order		Project Number	55380	B	
Company Name		Bill To Company	ERM	C	
Send Report To		Invoice Attn	SKT	D	
Address		Address		E	
				F	
City/State/Zip		City/State/Zip		G	
Phone		Phone		H	
Fax		Fax		I	
e-Mail Address		e-Mail Address		J	

No.	Sample Description	Date	Time	Matrix	Pres.	# Bottles	A	B	C	D	E	F	G	H	I	J	Hold
1	BALER WELL	11/21/06	1130	W		3	X										
2	N.F. WELL	11/21/06	1140	W		3	X										
3	TRIP BLANK						X										
4																	
5																	
6																	
7																	
8																	
9																	
10																	

Sampler(s) Please Print & Sign: | **Shipment Method:** | **Required Turnaround Time: (Check Box)** ☐ STD 10 Wk Days ☐ 5 Wk Days ☐ 2 Wk Days ☐ 24 Hour ☐ Other | **Results Due Date:**

Relinquished by: Sara Turnell	Date: 11/21/06	Time: 3:50p	Received by:	Notes:		
Relinquished by:	Date: 11/21	Time: 3:50	Received by (Laboratory):	e-Lab Analytical Cooler ID	Trip Blank Number	QC Package: (Check One Box Below)
Logged by (Laboratory):	Date: 11/21	Time:	Checked by (Laboratory): TBB			☐ Level II Std QC ☐ TRRP Checklist ☐ Level III Std QC/Raw Data ☐ TRRP Level IV ☐ Level IV SW846/CLP ☐ Other

Preservative Key: 1-HCl 2-HNO$_3$ 3-H$_2$SO$_4$ 4-NaOH 5-Na$_2$S$_2$O$_3$ 6-NaHSO$_4$ 7-Other 8-4°C 9-5035

Note: 1. Any changes must be made in writing once samples and COC Form have been submitted to e-Lab Analytical, Inc.

2. Unless otherwise agreed in a formal contract, services provided by e-Lab Analytical, Inc. are expressly limited to the terms and conditions stated on the reverse.

Copyright 2006 by e-Lab Analytical, Inc.

e-Lab Analytical, Inc

Sample Receipt Checklist

Client Name ERM-HOLL

Date/Time Received: 11/21/2006 3:50:00 AM

Work Order Number 0611442

Received by: ARB

Checklist completed by _____ Signature 11/21/06 Date

Reviewed by TBB Initials 11/21/06 Date

Matrix:

Carrier name: Client

Shipping container/cooler in good condition?	Yes ☑	No ☐	Not Present ☐
Custody seals intact on shipping container/cooler?	Yes ☐	No ☐	Not Present ☑
Custody seals intact on sample bottles?	Yes ☐	No ☐	Not Present ☑
Chain of custody present?	Yes ☑	No ☐	
Chain of custody signed when relinquished and received?	Yes ☑	No ☐	
Chain of custody agrees with sample labels?	Yes ☑	No ☐	
Samples in proper container/bottle?	Yes ☑	No ☐	
Sample containers intact?	Yes ☑	No ☐	
Sufficient sample volume for indicated test?	Yes ☑	No ☐	
All samples received within holding time?	Yes ☑	No ☐	
Container/Temp Blank temperature in compliance?	Yes ☑	No ☐	
Temperature(s)/Thermometer(s).	4 0 C		
Water - VOA vials have zero headspace?	Yes ☐	No ☑	No VOA vials submitted ☐
Water - pH acceptable upon receipt?	Yes ☑	No ☐	N/A ☐

Adjusted? NO Checked by AT

Login Notes:

Client contacted ✓ Date contacted: 11/21/06 Person contacted Sara Tunnell

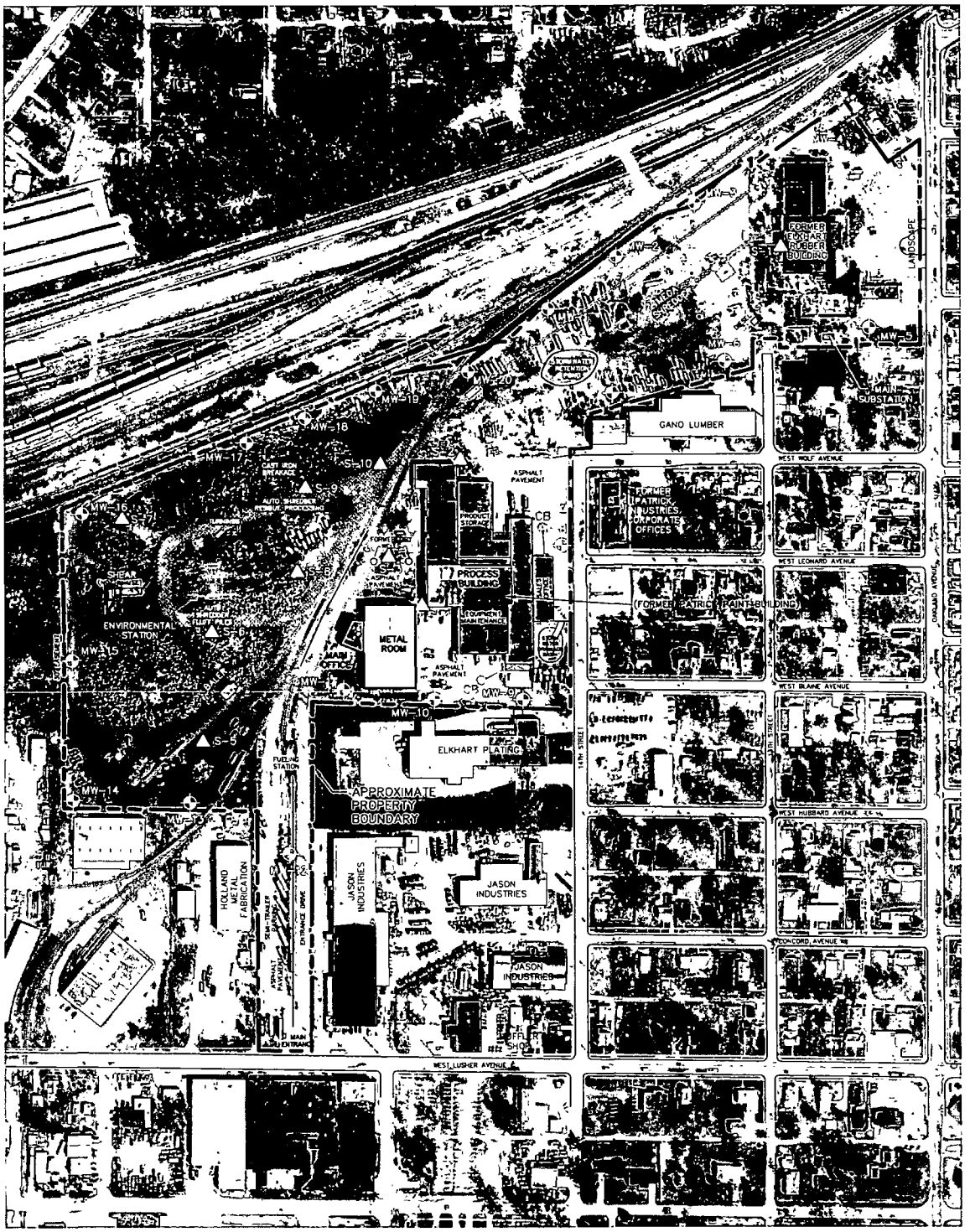
Contacted by: TBB Regarding: Headspace in samples.

Comments: Samples to be analyzed, per client request.

Corrective Action

EXHIBIT 11

APRIL 2008 SAMPLING LOCATIONS



CADD Review: FAK	ERM	**STURGIS IRON & METAL** 1514 LUSHER AVENUE ELKHART, INDIANA	CHK'D BY: MJD
DRAWN BY: GML			0080520
Date Drawn/Rev'd: 04/7/08–04/7/08		Environmental Resources Management	FIGURE 1

R:\CADD\Cin\O-T\Sturgis Iron and Metal\0080520\Elkhart Lusher Ave\0080520-01 ELKHART LUSHER AVE.dwg SAMPLING MAP 4/7/2008 4:54:02 PM RMA - HOLLAND

SOIL DA' tMARY
PRI\ D AND
CONFIDENTIAL
PREPARED AT THE DIRECTION OF COUNSEL
DO NOT COPY

Table 1 of 2

Summary of Soil Analyses- 04/03/08
1514 Lusher Ave, Elkhart, Indiana

Analyte	RISC Default Industrial Closure Levels[A]	RISC Default Residential Closure Levels[A]	S-1 (1')	S-2 (3')	S-2 (7')	S-3 (7')	S-4 (13')	S-5 (15')	S-6 (9')	S-7 (9')	S-7 (9')	S-8 (13')	S-9 (5')	S-9 (9')	S-10 (1')	S-10 (9')
VOCs (ug/kg):																
1,1,1-Trichloroethane	280,000	1,900	ND	ND	ND	ND	ND	ND	ND	290	ND	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	640	58	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,2-Trichloroethane	300 0000	3 00	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	58,000	5,600	ND	ND	ND	ND	ND	ND	ND	270	ND	ND	ND	ND	ND	ND
1,1-Dichloroethene	42,000	58	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloroethane	150	24	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,2-Dichloropropane	250	30	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,3-Dichloropropene, Total	200	40	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2-Butanone (MEK)	250,000	35,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2-Hexanone (MBK)	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
4-Methyl-2-pentanone (MIBK)	75,000	20,000	840	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Acetone	370,000	28,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzene	350	34	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromodichloromethane	510	510	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromoform	2,700	600	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromomethane	700	52	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon disulfide	82,000	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon tetrachloride	290	66	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chlorobenzene	27,000	1,300	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloroethane	10,000	650	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloroform	1,200	470	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloromethane	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	5,800	400	ND	ND	ND	ND	ND	ND	ND	600	ND	ND	ND	ND	ND	ND
cis-1,3-Dichloropropene [1]	200	40	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	160,000	13,000	2,600	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
m,p-Xylene	170,000	170,000	10,000	ND	ND	ND	ND	ND	ND	50	ND	ND	ND	ND	ND	ND
methylene chloride	1,800	23	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
o-Xylene	170,000	170,000	4,100	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Styrene	550,000	3,500	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethene	640	58	ND	ND	ND	ND	ND	950	ND	ND	ND	ND	ND	ND	ND	ND
Toluene	240,000	12,000	120	ND	ND	ND	ND	ND	ND	78	ND	ND	ND	ND	ND	ND
trans-1,2-Dichloroethene	14,000	680	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
trans-1,3-Dichloropropene [2]	200	40	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Trichloroethene	82	57	ND	ND	ND	ND	ND	ND	ND	630	ND	ND	ND	ND	ND	ND
Vinyl chloride	27	13	ND	ND	ND	ND	ND	ND	ND	250	ND	ND	ND	ND	ND	ND
Xylenes, Total	170,000	170,000	15,000	ND	ND	ND	ND	ND	ND	50	ND	ND	ND	ND	ND	ND

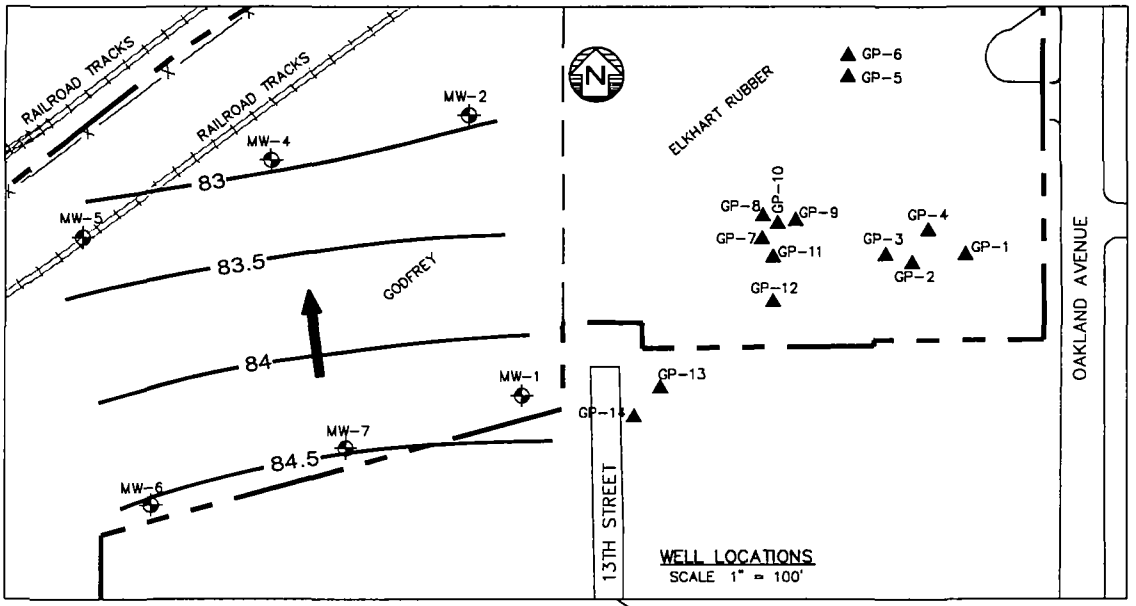
Notes
(A) - From RISC Technical Guide Table A--Default Closure Table--January 31, 2006
Shaded Values Exceed RISC Default Residential Closure Levels
Red-text values exceed RISC Default Industrial Closure Levels
1 Closure Levels are for Total 1,3-Dichloropropene, Data are for cis-1,3-Dichloropropene
2. Closure Levels are for Total 1,3-Dichloropropene, Data are for trans-1,3-Dichloropropene
NA - Criteria Not Available

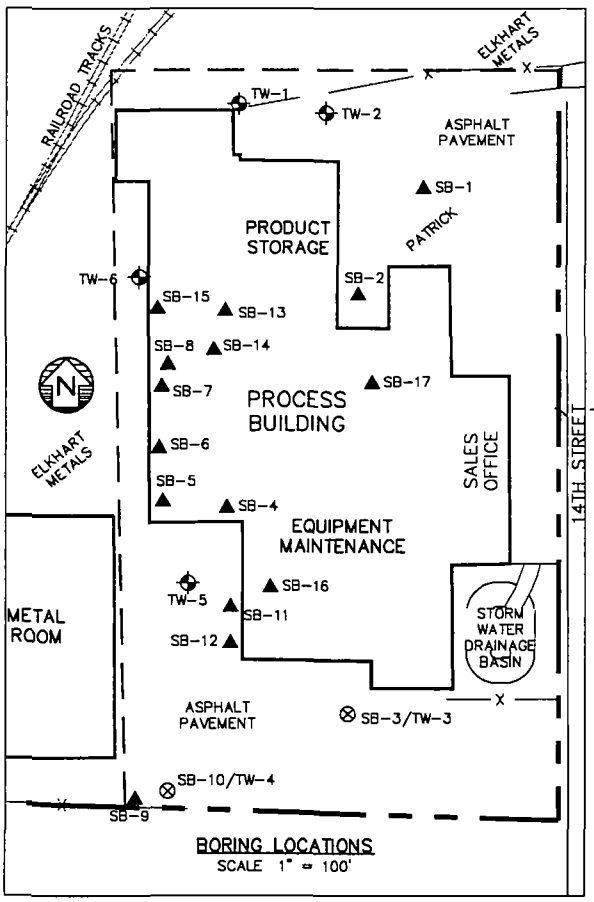
Table 2 of 2 *Summary of Groundwater Analyses 04/02/08-04/03/08*
1514 Lusher Ave, Elkhart, Indiana

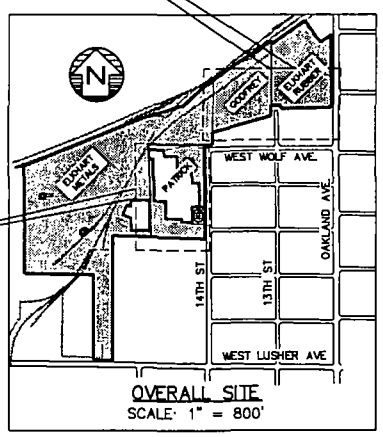
Analyte	RISC Default Industrial Closure Levels[A]	RISC Default Residential Closure Levels[A]	MW-1	MW-2	MW-3	MW-4	MW-5	MW-6	MW-7	MW-8	MW-9	MW-10	MW-11	MW-12	MW-13	MW-14	MW-15	MW-16	MW-17	MW-18	MW-19	MW-20
VOCs (ug/L)																						
1,1,1-Trichloroethane	29,000	200	ND	ND	ND	2.1	ND	ND	ND	ND	ND	ND	ND	3 1	1.8	70	83	230	82	11	1.8	ND
1,1,2,2-Tetrachloroethane	14	0 9	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,2-Trichloroethane	50	5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1-Dichloroethane	10,000	990	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	31	ND	3.1	20	270	84	ND	ND	ND
1,1-Dichloroethene	5,100	7 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.4	ND	ND	ND	3.5	1.6	ND	ND	ND
1,2-Dichloroethane	31	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.1	ND	ND	ND	ND
1,2-Dichloropropane	42	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,3-Dichloropropene, Total	29	5 6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2-Butanone	61,000	8,400	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
2-Hexanone	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
4-Methyl-2-pentanone	8,200	2,200	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Acetone	92,000	6,900	ND	ND	ND	190	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Benzene	52	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	17	ND	ND	ND	ND
Bromodichloromethane	80	80 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromoform	*360*	*80 0*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*	*ND*
Bromomethane	140	11 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon disulfide	10,000	1,300	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Carbon tetrachloride	22	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chlorobenzene	2,000	100	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloroethane	990	62	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1,000	ND	ND	ND	ND
Chloroform	1,000	80	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1 0	ND	ND	ND	1.6	ND	ND	ND	ND	ND
Chloromethane	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	1,000	70	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3 0	290	3.5	ND	2.6	ND
cis-1,3-Dichloropropene [1]	29	5 6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	NA	NA	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Ethylbenzene	10,000	700	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	11	ND	ND	ND	ND
m,p-Xylene	20,000	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	13	ND	ND	ND	ND
Methylene chloride	380	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
o-Xylene	20,000	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3.6	ND	ND	ND	ND
Styrene	20,000	100 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethene	55	5 0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	1.8	ND	ND	ND	ND	ND	ND	ND
Toluene	8,200	1,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	3.9	ND	ND	ND	ND
trans-1,2-Dichloroethene	2,000	100	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	15	ND	ND	ND	ND
trans-1,3-Dichloropropene [2]	29	5 6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Trichloroethene	7 2	5 0	170	9.5	ND	ND	ND	ND	ND	7 3	ND	22	3.0	ND	ND	14	42	16	15	80	78	5 0
Vinyl chloride	4 0	2.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	130	7.0	ND	ND	ND
Xylenes, Total	20,000	10,000	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	17	ND	ND	ND	ND

Notes
(A) - From RISC Technical Guide Table A--Default Closure Table--January 31, 2006
1 Closure Levels are for Total 1,3-Dichloropropene, Data are for cis-1,3-Dichloropropene
2. Closure Levels are for Total 1,3-Dichloropropene, Data are for trans-1,3-Dichloropropene
Shaded Values Exceed RISC Default Residential Closure Levels
Red text values exceed RISC Default Industrial Closure Levels
NA - Criteria Not Available
na - paramater not analyzed

SAMPLING LOCATION MAP







LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- SECURITY FENCE
- MONITORING WELL LOCATION
- GEOPROBE LOCATION
- SOIL BORING LOCATION
- 84 GROUNDWATER CONTOUR
- GROUNDWATER FLOW DIRECTION

CADD Review RMK	ERM.	STURGIS IRON & METAL 1514 LUSHER AVENUE ELKHART, INDIANA	CHK'D BY CCD
DRAWN BY. PGM			0080520
Date Drawn/Rev'd 3/28/08		Environmental Resources Management	FIGURE 2

R:\CADD\CHIO-TV\Sturgis Iron and Metal\0080520\Elkhart Lusher Ave\0080520-02_WELLOCATES.dwg, 3/28/2008 10:40:28 AM, paul marsh

EXHIBIT 12

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

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

NEW SOURCE CONSTRUCTION PERMIT AND MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

Sturgis Iron and Metal Co., Elkhart Metal Division
1514 West Lusher Avenue
Elkhart, Indiana 46517

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

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-20972-00622	
Issued by: Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: June 14, 2005 Expiration Date: June 14, 2010

COPY

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C.7 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee plans to construct and operate a stationary automobile shredding and ferrous scrap separation plant.

Authorized Individual:	Director of Operations
Source Address:	1514 West Lusher Avenue, Elkhart, Indiana 46517
Mailing Address:	P.O. Box 4537, Elkhart, Indiana 47514
General Source Phone:	(574) 295-0155
SIC Code:	5093
County Location:	Elkhart
Source Location Status:	Nonattainment area for 8-hour ozone standard Attainment area for all other criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD and Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

The stationary source is approved to construct and operate the following emissions units and pollution control devices:

(a) One (1) automobile shredder, identified as 01-01 Shredder, to be constructed in 2005, consisting of an 8,000 Hp Wendt scrap shredder, with a maximum capacity of 400 tons per hour, using water sprays at the materials feed chute, cutter head, and materials output chute.

(b) Twenty-seven (27) conveyor transfer points, identified as 01-02 Conveyor, to be constructed in 2005, each with a maximum capacity of 400 tons per hour of wetted material.

(c) Two (2) ferrous/non-ferrous metal separation processes, identified as 02-01A and 02-01B, to be constructed in 2005, each consisting of magnetic separators and a z-box/cyclone air separation system, with a combined maximum capacity of 400 tons per hour, and exhausting to stacks 02-01 S1 and 02-01 S2, respectively.

(d) One (1) conveyor transfer point, identified as 02-02 Conveyor, to be constructed in 2005, with a maximum capacity of 100 tons per hour of dry material.

(e) One (1) non-ferrous metal separation process, identified as 03-01, to be constructed in 2005, consisting of a trammel, conveyor, magnetic separator and eddy current separator, with a maximum capacity of 70 tons per hour with emissions exhausting inside the building.

(f) A diesel fuel storage tank and dispensing facility, having a maximum capacity of 20,000 gallons (75.7 cubic meters) of diesel fuel.

(g) Paved and unpaved roads and parking lots with public access.

(h) Repainting of customer scrap metal bins, using less than five (5) gallons of paint per day and having a potential to emit less than 15 pounds of VOC per day.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Revocation of Permits [326 IAC 2-1.1-9(5)]

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the Commissioner may revoke this permit if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Modification to Permit [326 IAC 2]

Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.7 Minor Source Operating Permit [326 IAC 2-6.1]

This document shall also become a minor source operating permit pursuant to 326 IAC 2-6.1 when, prior to start of operation, the following requirements are met:

(a) The attached Affidavit of Construction shall be submitted to the Office of Air Quality (OAQ), Permit Administration & Development Section.

(1) If the Affidavit of Construction verifies that the facilities covered in this Construction Permit were constructed as proposed in the application, then the facilities may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(2) If actual construction of the emission units differs from the construction proposed in the application, the source may not begin operation until the permit has been revised pursuant to 326 IAC 2-6.1-6 and an Operation Permit Validation Letter is issued.

(b) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(c) Upon receipt of the Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section, the Permittee shall attach it to this document.

(d) The operation permit will be subject to annual operating permit fees pursuant to 326 IAC 2-1.1-7(Fees).

B.8 Phase Construction Time Frame

Pursuant to 326 IAC 2-1.1-9(5)(Revocation of Permits), the IDEM may revoke this permit to construct if the construction of the automobile and ferrous scrap separation plant has not begun within eighteen (18) months from the effective date of this permit or if during the construction of the automobile and ferrous scrap separation plant, work is suspended for a continuous period of one (1) year or more.

The OAQ may extend such time upon satisfactory showing that an extension, formally requested by the Permittee is justified.

B.9 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.10 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days (this time frame is determined on a case by case basis but no more than ninety (90) days) after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.11 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

(d) No permit amendment or modification is required for the addition, operation or removal of a non-road engine, as defined in 40 CFR 89.2.

B.12 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC13-17-3-2][IC 13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

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

B.13 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.14 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

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

B.15 Credible Evidence [326 IAC 1-1-6]

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

SECTION C **SOURCE OPERATION CONDITIONS**

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds per Hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute non-overlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Fugitive Particulate Matter Emission Limitations [326 IAC 6-5]

Pursuant to 326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations), fugitive particulate matter emissions shall be controlled according to the plan submitted on March 21, 2005. The plan consists of:

Fugitive particulate matter emissions resulting from vehicle traffic on paved and unpaved roads and parking lots shall be controlled by sweeping and/or flushing with water on an as-needed basis.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ (and local agency) not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, (and local agency), if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be ten (10) days or more until the unit or device will be shut down, then the Permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down. The notification shall also include the status of the applicable compliance monitoring parameter with respect to normal, and the results of the response actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.12 Actions Related to Noncompliance Demonstrated by a Stack Test

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that re-testing in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the re-testing deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to non-compliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and

usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

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

(c) Unless otherwise specified in this permit, any annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years, unless otherwise specified in this permit. For the purpose of this permit "calendar year" means the twelve (12) month period from January 1 to December 31 inclusive.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-6-1-5(a)(1)]:

(a) One (1) automobile shredder, identified as 01-01 Shredder, to be constructed in 2005, consisting of an 8,000 Hp Wendt scrap shredder, with a maximum capacity of 400 tons per hour, using water sprays at the materials feed chute, cutter head, and materials output chute.

(b) Twenty-seven (27) conveyor transfer points, identified as 01-02 Conveyor, to be constructed in 2005, each with a maximum capacity of 400 tons per hour of wetted material.

(c) Two (2) ferrous/non-ferrous metal separation processes, identified as 02-01A and 02-01B, to be constructed in 2005, each consisting of magnetic separators and a z-box/cyclone air separation system, with a combined maximum capacity of 400 tons per hour, and exhausting to stacks 02-01 S1 and 02-01 S2, respectively.

(d) One (1) conveyor transfer point, identified as 02-02 Conveyor, to be constructed in 2005, with a maximum capacity of 100 tons per hour of dry material.

(e) One (1) non-ferrous metal separation process, identified as 03-01, to be constructed in 2005, consisting of a trammel, conveyor, magnetic separator and eddy current separator, with a maximum capacity of 70 tons per hour, with emissions exhausting inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from the metal shredder, ferrous/non-ferrous metal separators, non-ferrous metal separator, and conveyor transfer points shall not exceed the values shown in the following table when operating at the process weight shown:

Emission Unit	Process Weight (tons/hr)	326 IAC 6-3-2 Allowable Emissions (lbs/hr)
Metal Shredder (01-01)	400	66.3
Conveyors (01-02, 02-02)	400	66.3
Ferrous/Non-Ferrous Metal Separators (each) (02-01A, 02-01B)	200	58.5
Non-Ferrous Metal Separator (03-01)	70	47.8

The pounds per hour limitation was calculated with the following equation:
Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour;
and P = process weight rate in tons per hour

D.1.2 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.1.3 Particulate Control

(a) Pursuant to 326 IAC 6-3-2, and in order to comply with Condition D.1.1, the water sprays shall be in operation and control emissions from the metal shredder at all times that the metal shredder is in operation.

(b) Pursuant to 326 IAC 6-3-2, and in order to comply with Condition D.1.1, the cyclones shall be in operation and control emissions from the z-box/cyclone metal separators at all times that the z-box/cyclone metal separators are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)][326 IAC 2-6.1-5(a)(2)]

D.1.4 Visible Emissions Notations

(a) Visible emission notations of the ferrous/non-ferrous metal separator stack exhausts (02-01 S1 and 02-01 S2) shall be performed once per day during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those expected to prevail, eighty percent (80%) of the time the pro counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings s of the operation that would normally be expected to cause th

(d) A trained employee is an employee who has worked at the l and has been trained in the appearance and characteristics for that specific process.

(e) The Compliance Response Plan for this unit shall contain tr and response steps for when an abnormal emission is obse response steps in accordance with Section C - Compliance and Implementation shall be considered a deviation from th

We must send someone to school!

Record Keeping and Reporting Requirement

D.1.5 Record Keeping Requirements

(a) To document compliance with Condition D.1.4, the Permittee shall maintain records of visible emission notations of the ferrous/non-ferrous metal separator stack exhausts once per day.

(b) To document compliance with Condition D.1.2, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emissions Unit Description [326 IAC 2-6.1-5(a)(1)]:

(f) A diesel fuel storage tank and dispensing facility, having a maximum capacity of 20,000 gallons (75.7 cubic meters) of diesel fuel.

(g) Paved and unpaved roads and parking lots with public access.

(h) Repainting of customer scrap metal bins, using less than five (5) gallons of paint per day and having a potential to emit less than 15 pounds of VOC per day.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-6.1-5(a)(1)]

D.2.1 Volatile Organic Compound (VOC) Limitations [326 IAC 8-2-9]

In order for 326 IAC 8-2-9 to be not applicable to the repainting operation, the amount of VOC applied shall be not exceed 15 pounds per day.

D.2.2 Particulate [326 IAC 6-3-2(d)]

In order for 326 IAC 6-3-2(d) (Particulate Emission Limitations for Manufacturing Processes) to be not applicable to the repainting operation, the amount of paint applied shall not exceed five (5) gallons per day.

Record Keeping and Reporting Requirement [326 IAC 2-5.1-3(e)] [326 IAC 2-6.1-5(a)(2)]

D.2.3 Volatile Organic Compounds (VOC) [326 IAC 12]

Pursuant to 326 IAC 12 (New Source Performance Standards), the Permittee shall maintain the following information for the 20,000 gallon (75.7 cubic meter) diesel fuel storage tank:

(a) The vessel dimensions.

(b) The vessel capacity.

The Permittee shall keep all records as described for the life of the vessel.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Sturgis Iron and Metal Co., Elkhart Metal Division**
Address:	**1514 West Lusher Avenue**
City:	**Elkhart, Indiana 46517**
Phone #:	**(574) 295-0155**
MSOP #:	**M 039-20972-00622**

I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division is

☐ still in operation.
☐ no longer in operation.

I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division is

☐ in compliance with the requirements of MSOP 039-20972-00622.
☐ not in compliance with the requirements of MSOP 039-20972-00622.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERM LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____
_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

_____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____
*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Mail to: Permit Administration & Development Section
Office of Air Quality
100 North Senate Avenue
Indianapolis, Indiana 46204

Sturgis Iron and Metal Co., Elkhart Metal Division
1514 West Lusher Avenue
Elkhart, Indiana 46517

Affidavit of Construction

I, _____, being duly sworn upon my oath, depose and say:
(Name of the Authorized Representative)

1. I live in _____ County, Indiana and being of sound mind and over twenty-one (21) years of age, I am competent to give this affidavit.

2. I hold the position of _____ for _____.
(Title) (Company Name)

3. By virtue of my position with _____,I have personal
(Company Name)
knowledge of the representations contained in this affidavit and am authorized to make these representations on behalf of _____ .
(Company Name)

4. I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division, 1514 West Lusher Avenue, Elkhart, Indiana 46517, completed construction of the automobile shredding and ferrous scrap separation plant on _____ _____in conformity with the requirements and intent of the construction permit application received by the Office of Air Quality on March 21, 2005 and as permitted pursuant to Permit No. 039-20972-00622 issued on _____

Further Affiant said not.

I affirm under penalties of perjury that the representations contained in this affidavit are true, to the best of my information and belief.

_____
Signature

_____
Date

STATE OF INDIANA)
)SS
COUNTY OF _____)

Subscribed and sworn to me, a notary public in and for _____ County and State of Indiana on this _____ day of _____, 20 _____ .

My Commission expires: _____

_____
Signature

_____
Name (typed or printed)

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a
New Source Construction and Minor Source Operating Permit

Source Background and Description

Source Name:	Sturgis Iron and Metal Co., Elkhart Metal Division
Source Location:	1514 West Lusher Avenue, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	5093
Operation Permit No.:	039-20972-00622
Permit Reviewer:	ERG/ST

The Office of Air Quality (OAQ) has reviewed an application from Sturgis Iron and Metal Co., Elkhart Metal Division relating to the construction and operation of an automobile shredding and ferrous scrap separation plant.

New Emission Units and Pollution Control Equipment

The application includes information relating to the construction and operation of the following emission units and pollution control devices:

(a) One (1) automobile shredder, identified as 01-01 Shredder, to be constructed in 2005, consisting of an 8,000 Hp Wendt scrap shredder, with a maximum capacity of 400 tons per hour, using water sprays at the materials feed chute, cutter head, and materials output chute.

(b) Twenty-seven (27) conveyor transfer points, identified as 01-02 Conveyor, to be constructed in 2005, each with a maximum capacity of 400 tons per hour of wetted material.

(c) Two (2) ferrous/non-ferrous metal separation processes, identified as 02-01A and 02-01B, to be constructed in 2005, each consisting of magnetic separators and a z-box/cyclone air separation system, with a combined maximum capacity of 400 tons per hour, and exhausting to stacks 02-01 S1 and 02-01 S2, respectively.

(d) One (1) conveyor transfer point, identified as 02-02 Conveyor, to be constructed in 2005, with a maximum capacity of 100 tons per hour of dry material.

(e) One (1) non-ferrous metal separation process, identified as 03-01, to be constructed in 2005, consisting of a trammel, conveyor, magnetic separator and eddy current separator, with a maximum capacity of 70 tons per hour with emissions exhausting inside the building.

(f) A diesel fuel storage tank and dispensing facility, having a maximum capacity of 20,000 gallons (75.7 cubic meters) of diesel fuel.

(g) Paved and unpaved roads and parking lots with public access.

(h) Repainting of customer scrap metal bins, using less than five (5) gallons of paint per day and having a potential to emit less than 15 pounds of VOC per day.

Existing Approvals

This is the first permit to be issued to this source at this location.

Air Pollution Control Justification as an Integral Part of the Process

The company has submitted the following justifications such that the water sprays on the metal shredder (01-01 Shredder) and the cyclones on the two (2) ferrous/non-ferrous metal separation processes (02-01A and 02-01B) be considered as an integral part of the metal shredding process and the ferrous/non-ferrous metal separation processes, respectively:

(a) The materials inputs to the metal shredder consist primarily of crushed and uncrushed automobile bodies. These junk vehicle bodies typically contain flammable liquids and flammable solids. The high speed shearing action of the cutters on the Wendt metal shredder creates high instantaneous temperatures and sparks. The simultaneous presence of flammable materials and ignition sources may result in fires and explosions within the machinery. In order to prevent this, water sprays are directed at the metal shredder's material input chute, cutterhead and materials output chute, thereby thoroughly wetting the material before, during and after it is shredded. This wetting process both prevents explosions within the machinery and extinguishes any materials that ignite.

This wetting process is considered integral to the process because:

1. The water sprays serve a primary purpose other than pollution control. The purpose of the water sprays is to prevent fires and explosions within the machinery. Any fire or explosion of flammable materials within the machinery would damage it and, therefore, must be prevented. Also, any solid materials that caught fire would be transported via automatic conveyor to downline processes, with the possibility of damaging other equipment.

2. The water sprays have an overall positive net economic effect, and are designed by the manufacturer of the equipment to operate whenever the shredder operates. The constant operation of the water sprays while the shredder is in operation prevents explosions and fires which could result in damage to the shredding machine and unplanned shutdowns of the process. Damage to the machinery would result in repair and replacement costs. Process shutdowns would result in loss of revenue. Either of these results would have substantial negative financial impacts on the company.

(b) The z-box/cyclone in the ferrous/nonferrous metal separator sorts the shredded metal into ferrous, nonferrous and mixed (tramp) metals by use of an air powered centripetal process. Upon entering the metal separator, the stream of shredded metal is first sorted with magnets into ferrous and non-ferrous materials streams. The "ferrous" materials" stream (which, at this point in the process still contains about 4% non-ferrous materials by weight) then enters the z-box/cyclone where, by use of air currents, it is spun, sorted, separated and collected into ferrous and non-ferrous material streams.

The z-box/cyclone is considered integral to process because:

1. The z-box/cyclone serves a primary purpose other than pollution control. The z-box/cyclone is part of the materials sorting and collection mechanism. Its use enables high quality sorting of the input material into ferrous and non-ferrous

IDEM, OAC
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Enforcement Issue

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Stack Summary

Stack ID
02-01 S1
02-01 S2

Recommendation

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Emission Calculati

See Append

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materials in a one-pass-through operation. (Without use of the cyclone, a poor quality sorting of materials occurs, requiring reprocessing.)

2. The process cannot operate without the z-box/cyclone. The cyclone creates the air current needed in the z-box/cyclone to sort the shredded metal that passes through the z-box/cyclone into ferrous and nonferrous materials. Without the air current, the shredded metal is not sorted.

IDEM, OAQ has evaluated the justifications and agreed that the water sprays on the metal shredder and the cyclones on the two (2) ferrous/non-ferrous metal separators will be considered as an integral part of the metal shredding and metal separation processes, respectively. Therefore, the permitting level will be determined using the potential to emit after the water sprays and cyclones.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (°F)
02-01 S1	Separator	73.5	2.5	6,000	Ambient
02-01 S2	Separator	73.5	2.5	6,000	Ambient

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on March 21, 2005.

Emission Calculations

See Appendix A of this document for detailed emission calculations (pages 1 through 6).

The source reports that the composition of scrap material input to the shredding operation is 75% ferrous and 25% non-ferrous materials. Because the maximum capacity of the non-ferrous materials separator process (03-01) is 70 tons per hour (613,200 tons per year), the upstream shredder and ferrous separator processes (01-01, 01-02, 02-01A, 02-01B) can only process 2,452,800 tons per year (2,452,800 x 0.25 = 613,200) and the materials conveyor (02-02) can only process 613,200 tons per year, even though the maximum hourly operating capacities for these units are larger. PTE calculations for the entire source take this process bottleneck into account.

Potential to Emit of the Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr)
PM	28.1
PM-10	24.4
SO_2	0
VOC	6.2
CO	0
NO_x	0

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of PM is less than 100 tons per year but greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1. An MSOP will be issued.

(b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
PM2.5	Attainment or Unclassifiable
SO_2	Attainment
NO_2	Attainment
1-hour Ozone	Maintenance Attainment
8-hour Ozone	Basic Nonattainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) and Nitrogen Oxides (NOx) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NOx emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Emission Offset (326 IAC 2-3). See the State Rule Applicability for the source section.

(b) Elkhart County has been classified as unclassifiable or attainment for PM2.5. U.S. EPA has not yet estabilied the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 for PM2.5 emissions. Therefore, until the U.S.EPA adopts specific provisions for PSD review for PM2.5 emissions, it has directed states to regulate PM10 emissions as surrogate for PM2.5 emissions. See the State Rule Applicability for the source section.

(c) Elkhart County has been classified as attainment or unclassifiable in Indiana for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

New Source PSD Definition (emissions after controls, based on 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/yr)
PM	28.1
PM-10	24.4
SO_2	0
VOC	6.2
CO	0
NO_x	0
Single HAP	0
Combination HAPs	0

This new source is not a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater, no nonattainment pollutant is emitted at a rate of 100 tons per year or greater, and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2 and 326 IAC 2-3, the PSD and Emission Offset requirements do not apply.

Air Quality Impacts from Minor Sources

Modeling Overview: Pursuant to 326 IAC 2-1.1-5, IDEM, OAQ, has conducted a modeling analysis of the Limited Potential to Emit (PTE) of criteria pollutants from this proposed source to estimate whether the Limited PTE of criteria pollutants will cause or contribute to a violation of any National Ambient Air Quality Standard (NAAQS).

Modeling Results – Criteria Pollutants: The modeling results indicate that the Limited PTE of criteria pollutants from this source will not exceed the National Ambient Air Quality Standards (NAAQS).

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons per year.

This is the first air approval issued to this source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) included in this permit.

(b) The 20,000 gallon diesel fuel storage tank at this source is not subject to the New Source Performance Standard (NSPS), 40 CFR 60, Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for which Construction, Reconstruction, or Modification Commenced After July 23, 1984, because the diesel fuel storage tank has a capacity greater than 75 cubic meters but less than 151 cubic meters and is used to store a liquid with a maximum true vapor pressure less than 15.0 kPa. 40 CFR 60, Subpart Kb was revised on October 15, 2003.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAP)(326 IAC 14, 20 and 40 CFR Part 61, 63) included in this permit.

(d) The repainting of customer metal scrap bins is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants for Miscellaneous Metal Parts and Products Surface Coating Operations (40 CFR 63, Subpart MMMM) because this source is not a major source of HAPs (i.e., the source does not have the potential to emit 10 tons per year or greater of a single HAP or 25 tons per year or greater of a combination of HAPs) as defined in 40 CFR 63, Subpart A. Any change that would increase HAP emissions to greater than ten (10) tons per year of a single HAP or greater than twenty-five (25) tons per year of a combination of HAPs requires prior approval from IDEM, OAQ.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

This source is not in 1 of the 28 source categories and there are no applicable New Source Performance Standards that were in effect on August 7, 1980, therefore, fugitive emissions are not counted towards applicability of PSD.

The PTE for PM, PM10, SO_2, and CO for this automobile shredding and ferrous scrap metal processing facility is less than 250 tons per year. Therefore, pursuant to 326 IAC 2-2, this source is a minor PSD source.

326 IAC 2-3 (Emission Offset)

This source is located in Elkhart County. Elkhart County was designated as a nonattainment area for the 8-hour ozone standard on June 15, 2004. The potential to emit of VOC and NOx for this source is less than 100 tons per year. Therefore, this source is a minor source under Emission Offset. Any future modifications that increase VOC or NOx emissions must be reviewed in accordance with 326 IAC 2-3.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of this automobile shredding and ferrous scrap metal processing facility will emit less than ten (10) tons per year of a single HAP and less than twenty-five (25) tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and the potential to emit of PM, PM10, SO_2, NOx, CO and VOC is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-4 (Fugitive Dust Emissions)

The source is subject to 326 IAC 6-4 (Fugitive Dust Emissions) because the source maintains paved and unpaved roads and parking lots with public access. Pursuant to 326 IAC 6-4, the Permittee shall not generate fugitive dust to the extent that some portion of the material escapes

beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4.

326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)

This new source is located in Elkhart County, has fugitive particulate matter emissions greater than 25 tons per year, requires a permit as set forth in 326 IAC 2, and has not received all of the necessary preconstruction approvals before December 13, 1985. Therefore, this new source is subject to the requirements of 326 IAC 6-5. Pursuant to 326 IAC 6-5, the source has submitted a fugitive particulate matter control plan with their permit application. The plan is as follows, and is appended to the permit as Appendix A:

Fugitive particulate matter emissions resulting from vehicle traffic on paved and unpaved roads and parking lots shall be controlled by sweeping and/or flushing with water on an as-needed basis.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2, the particulate from the metal shredder, ferrous/non-ferrous metal separators, non-ferrous metal separator, and conveyors shall be limited by the following:

Emission Unit	Process Weight (tons/hr)	326 IAC 6-3-2 Allowable Emissions (lbs/hr)
Metal Shredder (01-01)	400	66.3
Conveyors (01-02, 02-02)	400	66.3
Ferrous/Non-Ferrous Metal Separators (each) (02-01A, 02-01B)	200	58.5
Non-Ferrous Metal Separator (03-01)	70	47.8

Interpolation and extrapolation of the data for the process weight rate in excess of sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 55.0\ P^{0.11} - 40$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

The water sprays shall be in operation at all times the metal shredder is in operation, in order to comply with this limit.

The cyclones shall be in operation at all times the z-box/cyclone metal separators are in operation, in order to comply with this limit.

Calculations show that particulate emissions from the metal shredder (01-01 Shredder), the ferrous/non-ferrous metal separators (02-01A and 02-01B) and the conveyors will be in compliance with these limits. (See Appendix A)

The non-ferrous metal separator (03-01) separates non-ferrous metallic from non-metallic materials by use of a sizing screen (trammel), magnetic separator and eddy current (rapidly changing electrical field) separator, as the material travels along a conveyor. Generation of airborne particulate matter is minimal. These emissions are uncontrolled.

326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

The insignificant repainting of customer metal scrap bins is a manufacturing process, as defined in 326 IAC 6-3-1.5(2), and uses less than five (5) gallons of paint per day. Pursuant to 326 IAC 6-3-1(b)(15), this facility is exempt from the requirements of 326 IAC 6-3.

326 IAC 8-1-6 (General Reduction Requirements for VOC Emissions)

The potential VOC emissions from the insignificant repainting of customer metal scrap bins are less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The insignificant repainting of customer metal scrap bins is located in Elkhart County, applies coatings to metal surfaces and does not have actual VOC emissions of greater than 15 pounds per day. Therefore, pursuant to 326 IAC 8-2-1(a)(4), this facility is not subject to the requirements of 326 IAC 8-2-9.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The diesel fuel storage tank is not located in Clark, Floyd, Lake, or Porter County. Therefore, the requirements of 326 IAC 8-9 do not apply to this facility.

326 IAC 12 (New Source Performance Standards)

The 20,000 gallon (75.7 cubic meter) diesel fuel storage tank is subject to the requirements of 326 IAC 12 because it has a volume greater than 75 cubic meters but less than 151 cubic meters and contains a volatile organic liquid with a maximum true vapor pressure less than 15.0 kilopascals. 326 IAC 12 incorporates by reference a version of 40 CFR 60, Subpart Kb, which predates the revisions made to 40 CFR 60, Subpart Kb on October 15, 2003. The following requirements will remain in effect until the State of Indiana incorporates the revised version of 40 CFR, Subpart Kb into its SIP.

Pursuant to 326 IAC 12, the Permittee shall maintain records of the dimensions of the tank and an analysis showing the capacity of the tank. These records shall be maintained for the life of the source.

Conclusion

The construction and operation of this automobile shredding and ferrous scrap separation plant shall be subject to the conditions of the New Source Construction and Minor Source Operating Permit M039-20972-00622.

Appendix A: Emissions Calculations
PM and PM10 Emissions from the Shredder

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

Process ID	Process Description	Maximum Capacity (tons/hour)	PM Emission Factor (lbs/ton)	PTE of PM (tons/year)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/year)
01-01	Metal Shredder	280	0.00257	3.15	0.00257	3.15

Assume all PM emissions are equal to PM10.
Material is wetted with water sprays at input feed, cutter head and output feed to minimize explosion and fire hazards.
The maximum hourly capacity for the Shredder (01-01) is limited by downstream capacity of the non-ferrous separation process.
The emission factor for the shredder is from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-10.F, for a comparable metal shredder (1996).

METHODOLOGY
PTE of PM/PM10 (tons/year) = Maximum Capacity (tons/hour) x Emission Factor (lbs/ton) x 8760 (hrs/year) x 1 ton/2000 lbs

Appendix A: Emissions Calculations
PM and PM10 Emissions from the Conveyors

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

Process ID	Process Description	Number of Processes	Maximum Capacity (tons/hour)	PM Emission Factor (lbs/ton)	PTE of PM (tons/year)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/year)
01-02	Conveyor Transfer Point - wet	27	280	0.00014	4.64	0.000046	1.52
02-02	Conveyor Transfer Point - dry	1	70	0.003	0.92	0.0011	0.34

The material input to the conveyors is thoroughly wetted in a previous step (shredding) and remains wetted during transit on the conveyors.
The maximum capacity for conveyors (01-02) are limited by downstream capacity of the non-ferrous separation process.
The emission factor for conveyor transfer point - wet is from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-06) (8/04).
The emission factor for conveyor transfer point - dry is from AP-42, Chapter 11.19, Table 11.19.2-2 (SCC 3-05-020-06) (8/04).

METHODOLOGY

PTE of PM/PM10 (tons/year) = Number of Processes x Maximum Capacity (tons/hour) x Emission Factor (lbs/ton) x 8760 (hours/year) x 1 ton/2000 lbs

Appendix A: Emission Calculations
PM and PM10 Emissions from the Metal Separators

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

Process ID	Process Description	Number of Processes	Combined Maximum Capacity (tons/hour)	PM Emission Factor (lbs/ton)	PTE of PM (tons/year)	PM10 Emission Factor (lbs/ton)	PTE of PM10 (tons/year)
02-01A, 02-01B	Z-box Ferrous/Non-Ferrous Metal Separators	2	280	0.0137	16.8	0.0137	16.8

The maximum capacity for Z-box Ferrous/Non-Ferrous Metal Separators (02-01A, 02-01B) are limited by downstream capacity of the non-ferrous separation process.
The emission factor for the ferrous/non-ferrous metal separators are from the Institute of Scrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-11.E, for a comparable metal separator (1996).

METHODOLOGY
PTE of PM/PM10 (tons/year) = Maximum Capacity (tons/hour) x Emission Factor (lbs/ton) x 8760 (hrs/year) x 1 ton/2000 lbs

Appendix A: Emission Calculations
VOC and PM/PM10 Emissions from Metal Coating Booth

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

Coating Material	Density (lbs/gal)	Weight % Water	Weight % VOC	Weight % Solids	Maximum Usage (gals/hour)	Actual VOC Usage (lbs/day)	PTE of VOC (tons/year)	PTE of PM/PM10 (tons/year)
Metal Primer	10.5	0.0%	54.2%	45.8%	0.25	14.2	6.20	2.63
Metal Topcoat	8.87	0.0%	63.2%	36.8%	0.25	14.0	6.14	1.79
					Worst Case Total	**14.2**	**6.20**	**2.63**

Surface coating booth can spray either primer or topcoat. Total assumes worst case coating
Assume all PM = PM10
Assume transfer efficiency for a spray gun is equal to 50%.
Assume all VOC is emitted.

METHODOLOGY
Actual VOC Usage (lbs/day) = Density (lbs/gal) x Weight % VOC (%) x Max. Usage (gals/hr) x 10 (hrs/day)
PTE of VOC (tons/year) = Density (lbs/gal) x Weight % VOC x Maximum Usage (gals/hour) x 8760 (hrs/year) x 1 ton/2000 lbs
PTE of PM/PM10 (tons/year) = Density (lbs/gal) x Weight % Solids x Maximum Usage (gals/hour) x 8760 (hrs/year) x 1 ton/2000 lbs x (1-Transfer Efficiency %)

Appendix A: Emission Calculations
Fugitive Emissions from Paved Roads

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

1. Emission Factors:

According to AP-42, Chapter 13 2.1 - Paved Roads (12/03), the PM/PM10 emission factors for paved roads can be estimated from the following equation:

$$E = k \times (sL/2)^a \times (w/3)^b - C$$

where:

E = emission factor (lb/vehicle mile traveled)
sL = road surface silt loading (g/m^2) = 0.6 (g/m^2) (AP-42, Table 13.2.1-3)
w = mean vehicle weight (tons) = 21.2 tons (see the calculations below)
k = empirical constant = 0.082 for PM and 0.016 for PM10
a = empirical constant = 0 65
b = empirical constant = 1.5
C = emission factor for vehicle exhaust (lb/VMT) = 0.00047 for PM and PM10 (AP-42, Table 13.2.1-2)

PM Emission Factor = $0.082 \times (0.6/2)^{0\ 65} \times (21.5/3)^{1\ 5} - 0\ 00047$ = **0.70 lbs/mile**

PM10 Emission Factor = $0.016 \times (0.6/2)^{0\ 65} \times (21.5/3)^{1\ 5} - 0.00047$ = **0.14 lbs/mile**

length of paved roads in one direction = **0.22 mile**

2. Potential to Emit (PTE) of PM/PM10 from Paved Roads:

Vehicle Type	* Trucks per day	*Average Vehicle Weight	* Total Trip Number	Traffic Component	Component Vehicle Weight	Vehicle Mile Traveled (VMT)	PTE of PM	PTE of PM10
		(tons)	(trips/yr)	(%)	(tons)	(miles/yr)	(tons/yr)	(tons/yr)
HH scrap receiving	25	28.0	9,125	17.9%	5.00	3,975	1.40	0.27
HH scrap shipping	25	28.0	9,125	17.9%	5.00	3,975	1.40	0.27
Semi scrap receiving	25	29.5	9,125	17 9%	5.27	3,975	1.40	0.27
Semi scrap shipping	25	29.5	9,125	17.9%	5.27	3,975	1.40	0.27
Pickup Truck	40	2.30	14,600	28.6%	0.66	6,360	2.24	0.44
Total	**140**			**100%**	**21.2**	**22,259**	**7.83**	**1.52**

* This information is provided by the source

Methodology
Component Vehicle Weight = Average Vehicle Weight (tons) x Traffic Component (%)
(Note that the summation of the component vehicle weight equals the Mean Vehicle Weight.)
VMT(miles/yr) = 0.22 mile/trip x 2 x Total Trip Numbers (trips/yr)
PTE of PM/PM10 (tons/yr) = VMT (miles/yr) x Emission Factor (lbs/mile) x 1 tons/ 2000 lbs

Appendix
Fugitive Emi

Company Name
Address
NSC/MSOF
Reviewer
Date

1. Emission Factors:

According to AP-42, C
factors for unpaved ro

$$E = k \times (s/1$$

where:

E
s
w
k
a
b

PM Emission Factor =

PM10 Emission Factor

2. Potential to Emit (PTE) of PM/

Vehicle Type	* Miles p day
10-yard Loader	45.6

* This information is provided by the source

Methodology

VMT(miles/yr) = Miles per day (mil
PTE of PM/PM10 (tons/yr) = VMT

Appendix A: Emission Calculations
Fugitive Emissions from Unpaved Roads

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division
Address: 1514 West Lusher Avenue, Elkhart, Indiana 46517
NSC/MSOP: M039-20972-00622
Reviewer: ERG/ST
Date: March 25, 2005

1. Emission Factors:

According to AP-42, Chapter 13.2.2 - Unpaved Roads (12/03), the PM/PM10 emission factors for unpaved roads can be estimated from the following equation:

$$E = k \times (s/12)^a \times (w/3)^b$$

where:

E = emission factor (lb/vehicle mile traveled)	
s = surface material silt content (%) =	2.6 % (source)
w = mean vehicle weight (tons) =	59.0 tons
k = empirical constant =	4.9 for PM and 1.5 for PM10
a = empirical constant =	0.7 for PM and 0.9 for PM10
b = empirical constant =	0.45 for PM and PM10

PM Emission Factor = $4.9 \times (2.6/12)^{0.7} \times (59/3)^{0.45}$ = **6.4 lbs/mile**

PM10 Emission Factor = $1.5 \times (2.6/12)^{0.9} \times (59/3)^{0.45}$ = **1.4 lbs/mile**

2. Potential to Emit (PTE) of PM/PM10 from Unpaved Roads:

Vehicle Type	* Miles per day	*Average Vehicle Weight	Traffic Component	Component Vehicle Weight	Vehicle Mile Traveled (VMT)	PTE of PM	PTE of PM10
		(tons)	(%)	(tons)	(miles/yr)	(tons/yr)	(tons/yr)
10-yard Loader	45.6	59	100%	59.0	11,856	38.0	8.58

* This information is provided by the source.

Methodology
VMT(miles/yr) = Miles per day (miles) x Days of Operation (days/yr)
PTE of PM/PM10 (tons/yr) = VMT (miles/yr) x Emission Factor (lbs/mile) x 1 tons/ 2000 lbs

OFFICE OF AIR QUALITY

Minor Source Criteria Pollutant Modeling
Screening Form - Raw Data

General Permit Information

Permit Number: M039-20972-00622

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Division

City: Elkhart

County: Elkhart

Permit Reviewer: ERG/ST

Date results are needed:

Source Specific Information

TABLE 1 - Criteria Pollutant Emission Rates (lb/hr) - based on the highest allowable emissions rate

Stack ID	CO	NO_x	PM_{10}	Pb	SO_2
02-01 S1	0	0	1 915	0	0
02-01 S2	0	0	1 915	0	0
Totals:	*0*	*0*	*3 83*	*0*	*0*

TABLE 2 - Stack Information: (All heights are from ground level)
For non-circular stacks, take the average of the stack dimensions as the stack diameter.

Stack ID	Stack Height (ft)	Flow Rate (acfm)	Stack Temp. (°F)	Stack Diameter (ft)	Closest building related to stack: Height (ft)	Width (ft)	Length (ft)
02-01 S1	73 5	6,000	ambient	2 5			
02-01 S2	73.5	6,000	ambient	2.5			
0							
0							
0							
0							
0							

Closest Property Line (Distance in feet): 275 No No building *(Please check if this applies)*

OFFICE OF AIR QUALITY

Minor Source Criteria Pollutant Modeling
Screening Form - Modeling Results

General Permit Information

Permit Number: M039-20972-00622

Company Name: Sturgis Iron and Metal Co., Elkhart Metal Di **Model Used** ***(Please check one)*:**

City: Elkhart ☑ SCREEN ☐ ISCST

County: Elkhart **Date Modeling Completed:** 3/31/2005

Permit Reviewer: ERG/ST **Modeler:** ERG/ST

Date results are needed: NA

Modeling Results

TABLE 3 - Criteria Pollutants - Maximum Concentration (ug/m3):

Averaging Period	CO	NOX	PM10	Pb	SO2
1-hour modeled concentration					
NAAQ Standard	40000				
PASS or FAIL	PASS				
3-hour modeled concentration					
NAAQ Standard					1300
PASS or FAIL					PASS
8-hour modeled concentration					
NAAQ Standard	10000				
PASS or FAIL	PASS				
24-hour modeled concentration			29		
NAAQ Standard			150		365
PASS or FAIL			PASS		PASS
Quarterly modeled concentration					
NAAQ Standard				1.5	
PASS or FAIL				PASS	
Annual modeled concentration			5.8		
NAAQ Standard		100	50		80
PASS or FAIL		PASS	PASS		PASS

What if you are not satisfied with this decision and you want to file an appeal?

Who may file an appeal?
The decision described in the accompanying Notice of Decision may be administratively appealed. Filing an appeal is formally known as filing a "Petition for Administrative Review" to request an "administrative hearing."

If you object to this decision issued by the Indiana Department of Environmental Management (IDEM) and are: 1) the person to whom the decision was directed, 2) a party specified by law as being eligible to appeal, or 3) aggrieved or adversely affected by the decision, you are entitled to file an appeal. (An aggrieved or adversely affected person is one who would be considered by the court to be negatively impacted by the decision. If you file an appeal because you feel that you are aggrieved, it will be up to you to demonstrate in your appeal how you are directly impacted in a negative way by the decision).

The Indiana Office of Environmental Adjudication (OEA) was established by state law – see Indiana Code (IC) 4-21.5-7 – and is a separate state agency independent of IDEM. The jurisdiction of the OEA is limited to the review of environmental pollution concerns or any alleged technical or legal deficiencies associated with the IDEM decision making process. Once your request has been received by OEA, your appeal may be considered by an Environmental Law Judge.

What is required of persons filing an appeal?
Filing an appeal is a legal proceeding, so it is suggested that you consult with an attorney. Your request for an appeal must include your name and address and identify your interest in the decision (Or, if you are representing someone else, his or her name and address and their interest in the decision). In addition, please include a photocopy of the accompanying Notice of Decision or list the permit number and name of the applicant, or responsible party, in your letter.

Before a hearing is granted, you must identify the reason for the appeal request and the issues proposed for consideration at the hearing. You also must identify the permit terms and conditions that, in your judgment, would appropriately satisfy the requirements of law with respect to the IDEM decision being appealed. That is, you must suggest an alternative to the language in the permit (or other order, or decision) being appealed, and your suggested changes must be consistent with all applicable laws (See Indiana Code 13-15-6-2) and rules (See Title 315 of the Indiana Administrative Code, or 315 IAC).

The effective date of this agency action is stated on the accompanying Notice of Decision (or other IDEM decision notice). If you file a "Petition for Administrative Review" (appeal), you may wish to specifically request that the action be "stayed" (temporarily halted) because most appeals do not allow for an automatic "stay." If, after an evidentiary hearing, a "stay" is granted, the IDEM-approved action may be halted altogether, or only allowed to continue in part, until a final decision has been made regarding the appeal. However, if the action is not "stayed" the IDEM-approved activity will be allowed to continue during the appeal process.

(See reverse side)

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

'itchell E. Daniels, Jr.
overnor

Thomas W. Easterly
Commissioner

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

TO: Interested Parties / Applicant

DATE: June 14, 2005

RE: Sturgis Iron & Metal Co. / 039-20972-00622

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

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

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

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 1/10/05

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Sturgis Iron and Metal Co., Elkhart Metal Division**
Address:	**1514 West Lusher Avenue**
City:	**Elkhart, Indiana 46517**
Phone #:	**(574) 295-0155**
MSOP #:	**M 039-20972-00622**

I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division is
☐ still in operation.
☐ no longer in operation.

IN CONSTRUCTION

I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division is
☑ in compliance with the requirements of MSOP 039-20972-00622.
☐ not in compliance with the requirements of MSOP 039-20972-00622.

Authorized Individual (typed):	Dale McDougle
Title:	Director of Operations
Signature:	
Date:	May 26, 2006

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

COPY

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

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MSOP #:	**M 039-20972-00622**

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- ☐ still in operation.
- ☐ no longer in operation. IN CONSTRUCTION

I hereby certify that Sturgis Iron and Metal Co., Elkhart Metal Division is

- ☑ in compliance with the requirements of MSOP 039-20972-00622.
- ☐ not in compliance with the requirements of MSOP 039-20972-00622.

Authorized Individual (typed):	Dale McDougle
Title:	Director of Operations
Signature:	
Date:	May 26, 2006

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

COPY

EXHIBIT 13

NOTICE OF INTENT (NOI) STORM WATER RUNOFF ASSOCIATED WITH CONSTRUCTION ACTIVITY

State Form 47487 (R6 / 9-04)
Approved by State Board of Accounts 2004
Indiana Department of Environmental Management
Drinking Water Branch

Submission of this Notice of Intent letter constitutes notice that the project site owner is applying for coverage under the National Pollutant Discharge Elimination System (NPDES) General Permit Rule for Storm Water Discharges Associated with Construction Activity. Permitted project site owners are required to comply with all terms and conditions of the General Permit Rule 327 IAC 15-5 (Rule 5).

Check the type of Submittal: [X] Initial [ ] Amendment [ ] Renewal

(Permit Number below required for Renewals and Admendments Only - Not required for Initial Submittal)

Project Name and Location:

Project Permit # _____ Project Name: HEAVY SHREDDER County: ELKHART

Brief Description of Project Location W OF OAKLAND AVE. & N OF LUSNER AVE IN CITY OF ELKHART

Latitude Deg 41 / Min. 40 / Sec 31.2 and Quarter SE Section 7

Longitude Deg 85 / Min 59 / Sec 23.9 Township 37 N Range 5E

Does [X] all or [ ] part of this project lie within the jurisdictional boundaries of a Municipal Separate Storm Sewer System (MS4) [X] Yes [ ] No If yes, please name the MS4(s):

GREATER ELKHART COUNTY

Project Site Owner and Project Contact Information:

Company Name (If Applicable): CR MEYER

Project Site Owner's Name (An Individual) DONALD "BUCK" LARSH Title/Position:

Address P O BOX 2157

City OSHKOSH State: WI Zip: 54903

Phone: 920-235-3350 E-Mail Address (If Available):

Ownership Status (check one): Governmental Agency: [ ] Federal [ ] State [ ] Local

Non-Governmental: [ ] Public [X] Private [ ] Other (Explain):

Contact Person: JASON M. HANAWAY Affiliation with Project Site Owner: PROJECT ENGINEER

Company Name: WIGHTMAN & PEIRCE

Address (if different from above): 4703 CHESTER DR.

City ELKHART State IN Zip 46516

Phone: 574-293-7762 E-Mail Address (If Available) jhanaway@wightmanpeirce.com

Project Description:

[ ] Residential-Single Family [ ] Residential-Multi-Family [ ] Commercial [X] Industrial [ ] Other

Discharge Information:

Name of Receiving Water: ST. JOSEPH RIVER

(If applicable, name of municipal operator of storm sewer. Please note that even if a retention pond is present on the property, the name of the nearest possible receiving water is required).

Project Acreage:

Total Acreage: 17.61 Acres Proposed Acreage to be Disturbed: 8 Acres

Total Impervious Surface Area (Estimated for Completed Project): 116708 Square Feet

(as defined in 327 IAC 15-5-4(16) including structures, roads, parking lots, and other similar improvements)

Timetable:

Start Date: JULY 1, 2005 and Estimated End Date for all Land Disturbing Activity: JAN. 1, 2006

NOTE: Within forty-eight hours of the initiation of construction activity, the project site owner must notify the appropriate plan reviewing agency of the actual project start date.

(Continued on Reverse Side)

Construction Plan Certification:

By signing this Notice of Intent letter, I certify the following

A The storm water quality measures included in the construction plan comply with the requirements of 327 IAC 15-5-6.5, 327 IAC 15-5-7, and 327 IAC 15-5-7.5;

B the storm water pollution prevention plan complies with all applicable federal, state, and local storm water requirements.

C the measures required by 327 IAC 15-5-7 and 327 IAC 15-5-7.5 will be implemented in accordance with the storm water pollution prevention plan;

D if the projected land disturbance is one (1) acre or more the applicable Soil and Water Conservation District or other entity designated by the Department, has been sent a copy of the construction plan for review,

E storm water quality measures beyond those specified in the storm water pollution prevention plan will be implemented during the life of the permit if necessary to comply with 327 IAC 15-5-7, and

F implementation of storm water quality measures will be inspected by trained individuals.

In addition to this form, I have enclosed the Following:

☑ Verification by the reviewing agency of acceptance of the construction plan

☑ Proof of publication in a newspaper of general circulation in the affected area that notified the public that a construction activity is to commence, including all required elements contained in 327 IAC 15-5-5 (9)

☑ $100 check or money order payable to the Indiana Department of Environmental Management. If the project lies solely within the permitted jurisdiction of an MS4 **and is regulated by the MS4 under 327 IAC 15-13 – a fee is not required with submittal of this Notice of Intent**

A permit issued under 327 IAC 15-5 is granted by the commissioner for a period of five (5) years from the date coverage commences. Once the five (5) year permit term duration is reached, a general permit issued under this rule will be considered expired, and, as necessary for construction activity continuation, a new Notice of Intent letter would need to be submitted ninety (90) days prior to the termination of coverage.

Project Site Owner Responsibility Statement:

By signing this Notice of Intent letter, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Printed Name of Project Owner _____

Signature of Project Owner Barry Ratliff Date: 6-23-05

This Notice of Intent must be signed by an individual meeting the signatory requirements in 327 IAC 15-4-3(g) and submitted in accordance with 327 IAC 15-5-6.

Mail this form to: Indiana Department of Environmental Management
Urban Wet Weather Section
Cashiers Office Attn: OWQ Rule 5
100 North Senate Avenue
Indianapolis, IN 46204

327 IAC 15-5-6 (a) also requires a copy of the completed Notice of Intent letter be submitted to the local Soil and Water Conservation District or other entity designated by the Department, where the land disturbing activity is to occur.

Questions regarding the development of the Construction Plan and/or field implementation of 327 IAC 15-5 may be directed to your local Soil and Water Conservation District office or the Department of Natural Resources at 317-233-3870. Questions regarding the Notice of Intent may be directed to the Rule 5 contact person at 317/233-1864 or 800/451-6027 ext 31864

Elkhart County Soil and Water Conservation District
17746 B County Road 34, Goshen IN 46528-9261 ✦ Phone: (574) 533-3630, Ext 3 ✦ Fax: (574) 533-4620

Fax Cover Sheet

Date: 6-22-05

To: Mr. Donald Coobs, C R Meyer
Fax #: 920-235-3919

From: Eric Kurtz
Elkhart County SWCD
Fax#: 574/533-4620
Phone#: 574/533-3630 x3

Pages (including cover sheet): 4

* * * * *

Attached is the stormwater pollution prevention plan review for your project. The plan is adequate as submitted. Please copy the cover page of the review and submit with the Notice of Intent (NOI) packet. The NOI packet also includes the NOI Form, Public Notice and the $100 Filing Fee. To make sure you have the most up-to-date form, I recommend that you download the NOI from the IDEM Website each time you need it. That website is
http://www.in.gov/icpr/webfile/formsdiv/47487.pdf

Construction may start 48 hours after the postmarked date of your NOI submittal to IDEM.

Make sure amendments to the plan are delivered to the contractor and are utilized in the construction of this project

Construction/Stormwater Pollution Prevention Plan Technical Review and Comment *(Form 1)*

Project Information

Project Name: Sturgis Iron & Metal Heavy Shredder Site County: Elkhart
Plan Submittal Date: 06/06/05 Hydrologic Unit Code: *04050001220010
Project Location Description: W Side of Oakland Ave. N of Lusher Ave., Elkhart
Latitude and Longitude Lat 41 40' 01.2"N Long. 85 59' 23.9"W
Civil Township: Concord Quarter: SE Section: 7 Township: 37N Range: 5E

Project Owner Name: CR Meyer
Contact: Donald Laabs
Address: P.O. Box 2157
City: Oshkosh State: WI Zip: 54903
Phone: 920-235-3350 FAX: 920-235-3419 E-Mail:

Plan Preparer Name: Jason Hanaway
Affiliation: Wightman Petrie, Inc.
Address: 4703 Chester Dr
City: Elkhart State: IN Zip: 46516
Phone: 574-293-7762 FAX: 574-294-3717 E-Mail: jhanaway@wightmanpetrie.com

Plan Review

Review Date: 06/22/05
Principal Plan Reviewer: Eric Kurtz, Urban Conservationist
Agency: Elkhart Co. Soil and Water Conservation District
Address: 17746-B CR 34
City: Goshen State: IN Zip: 46528
Phone: 574-533-3630 x3 FAX: 574-533-4620 E-Mail: Eric.Kurtz@IN.Nacdnet.net
Assisted By:

☑ **PLAN IS ADEQUATE:** A comprehensive plan review has been completed and it has been determined that the plan satisfies the minimum requirements and intent of 327 IAC 15-5.

- ☑ Please refer to additional information included on the following page(s).
- ☑ Submit Notice of Intent (NOI): *Attach a copy of this cover page when submitting the NOI to the Indiana Department of Environmental Management. Construction activities may begin 48 hours following the submittal of the NOI. A copy of the NOI must also be sent to the Reviewing Authority (e.g. SWCD, DNR).*

☐ A preliminary plan review has been completed; a comprehensive review will not be completed within the 28-day review period. The reviewing authority reserves the right to perform a comprehensive review at a later date and revisions to the plan may be required at that time to address deficiencies.

- ☐ Please refer to additional information included on the following page(s).
- ☐ Submit Notice of Intent (NOI): *Attach a copy of this cover page when submitting the NOI to the Indiana Department of Environmental Management. Construction activities may begin 48 hours following the submittal of the NOI. A copy of the NOI must also be sent to the Reviewing Authority (e.g. SWCD, DNR).*

☐ **PLAN IS DEFICIENT:** Significant deficiencies were identified during the plan review.

- ☐ Please refer to additional information included on the following page(s).
- ☐ DO NOT file a Notice of Intent for this project.
- ☐ DO NOT commence land disturbing activities until all deficiencies are adequately addressed, the plan re-submitted, and notification has been received that the minimum requirements have been satisfied.

☐ Plan Revisions ☐ Deficient Items should be mailed or delivered to the Principal Plan Reviewer identified in the Plan Review Section above.

Construction/Stormwater Pollution Prevention Plan - Technical Review and Comment *(Form 1)*

Project Name: Sturgis Iron & Metal Heavy Shredder Site
Date Reviewed: 06/22/05

The technical review and comments are intended to evaluate the completeness of the Construction/Stormwater Pollution Prevention Plan for the project. The Plan submitted was not reviewed for the adequacy of the engineering design. All measures included in the plan, as well as those recommended in the comments should be evaluated as to their feasibility by a qualified individual with structural measures designed by a qualified engineer. The Plan has not been reviewed for other local, state, or federal permits that may be required to proceed with this project. Additional information, including design calculations may be requested to further evaluate the Plan.

All proposed stormwater pollution prevention measures and those referenced in this review must meet the design criteria and standards set forth in the "Indiana Stormwater Quality Manual" from the Indiana Department of Natural Resources, Division of Soil Conservation or similar Guidance Documents.

Please direct questions and/or comments regarding this plan review to:
Eric Kurtz, Urban Conservationist
Please refer to the address and contact information identified in the Plan Review Section on page 1

Assessment of Construction Plan Elements *(Section A)*

The Construction Plan Elements are adequately represented to complete a plan review:
☑ Yes ☐ No
The items checked below are deficient and require submittal to meet the requirements of the rule.

A			A		
☐	1	Index showing locations of required Plan Elements	☐	2	11 by 17 inch plat showing building lot numbers/boundaries and road layout/names
☐	3	Narrative describing the nature and purpose of the project	☐	4	Vicinity map showing project location
☐	5	Legal Description of the Project Site (Include Latitude and Longitude - NOI Requirement)	☐	6	Location of all lots and proposed site improvements (roads, utilities, structures, etc.)
☐	7	Hydrologic unit code (14 Digit)	☐	8	Notation of any State or Federal water quality permits
☐	9	Specific points where stormwater discharge will leave the site	☐	10	Location and name of all wetlands, lakes and water courses on and adjacent to the site
☐	11	Identification of all receiving waters	☐	12	Identification of potential discharges to ground water (abandoned wells, sinkholes, etc.)
☐	13	100 year floodplains, floodways, and floodway fringes	☐	14	Pre-construction and post construction estimate of Peak Discharge (10 Year storm event)
☐	15	Adjacent landuse, including upstream watershed	☐	16	Locations and approximate boundaries of all disturbed areas (Construction Limits)
☐	17	Identification of existing vegetative cover	☐	18	Soils map including soil descriptions and limitations
☐	19	Locations, size and dimensions of proposed stormwater systems (e.g. pipes, swales and channels)	☐	20	Plans for any off-site construction activities associated with this project (sewer/water tie-ins)
☐	21	Locations of proposed soil stockpiles and/or borrow/disposal areas	☐	22	Existing site topography at an interval appropriate to indicate drainage patterns
☐	23	Proposed final topography at an interval appropriate to indicate drainage patterns			

Construction/Stormwater Pollution Prevention Plan - Technical Review and Comment *(Form 1)*

Project Name: Sturgis Iron & Metal Heavy Shredder Site
Date Reviewed: 06/22/05

Assessment of Stormwater Pollution Prevention Plan *(Sections B & C)*

Stormwater Pollution Prevention Plan - Construction Component *(Section B)*

The construction component of the Stormwater Pollution Prevention Plan includes stormwater quality measures to address erosion, sedimentation, and other pollutants associated with land disturbance and construction activities. Proper implementation of the plan and inspections of the construction site are necessary to minimize the discharge of pollutants. The Project Site Owner should be aware that unforeseen construction activities and weather conditions may affect the performance of a practice or the effectiveness of the plan. The plan must be a flexible document, with provisions to modify or substitute practices as necessary.

Adequate	Deficient	Not Applicable	B	
☑	☐	☐	1	Description of potential pollutant sources associated with construction activities
☑	☐	☐	2	Sequence describing stormwater quality measure implementation relative to land disturbing activities
☑	☐	☐	3	Stable construction entrance locations and specifications (at all points of ingress and egress)
☑	☐	☐	4	Sediment control measures for sheet flow areas
☑	☐	☐	5	Sediment control measures for concentrated flow areas
☑	☐	☐	6	Storm sewer inlet protection measure locations and specifications
☐	☐	☑	7	Runoff control measures (*e.g. diversions, rock check dams, slope drains, etc.*)
☑	☐	☐	8	Storm water outlet protection specifications
☐	☐	☑	9	Grade stabilization structure locations and specifications
☑	☐	☐	10	Location, dimensions, specifications, and construction details of each stormwater quality measure
☑	☐	☐	11	Temporary surface stabilization methods appropriate for each season (*include sequencing*)
☑	☐	☐	12	Permanent surface stabilization specifications (*include sequencing*)
☑	☐	☐	13	Material handling and spill prevention plan
☑	☐	☐	14	Monitoring and maintenance guidelines for each proposed stormwater quality measure
☐	☐	☑	15	Erosion & sediment control specifications for individual building lots

Stormwater Pollution Prevention Plan - Post Construction Component *(Section C)*

The post construction component of the Stormwater Pollution Prevention Plan includes the implementation of stormwater quality measures to address pollutants that will be associated with the final landuse. Post construction stormwater quality measures should be functional upon completion of the project. Long term functionality of the measures are critical to their performance and should be monitored and maintained.

Adequate	Deficient	Not Applicable	C	
☑	☐	☐	1	Description of pollutants and their sources associated with the proposed land use
☑	☐	☐	2	Sequence describing stormwater quality measure implementation
☑	☐	☐	3	Description of proposed post construction stormwater quality measures *(Include a written description of how these measures will reduce discharge of expected pollutants)*
☑	☐	☐	4	Location, dimensions, specifications, and construction details of each stormwater quality measure
☑	☐	☐	5	Description of maintenance guidelines for post construction stormwater quality measures

NAPPANEE

HIVELY

6-16A

19th

6-18B

ELKHART

6-18C

CORP.

15th

6-18D

AVE

OAKLAND

6-18E

MISHAWAKA

6-18F

6-18G

GH 20

LINE

6-18H

LEXINGTON

MEISNER AVE

U.S. 20

HIGHLAND

St. Joseph

ST.

6-7A

6-7B

6-7C

6-7D

6-7E

6-7F

6-7G

S-F

S2 LINE

CORP

INDIANA

OKEMA

ALBANY

ELKHART

TROXEL AVE

P.C.

TR. CO.

U.S. 33

NAPPANEE

LUSHER

U.S. 33 & IND. 19

6-6

1977 1" = 400'

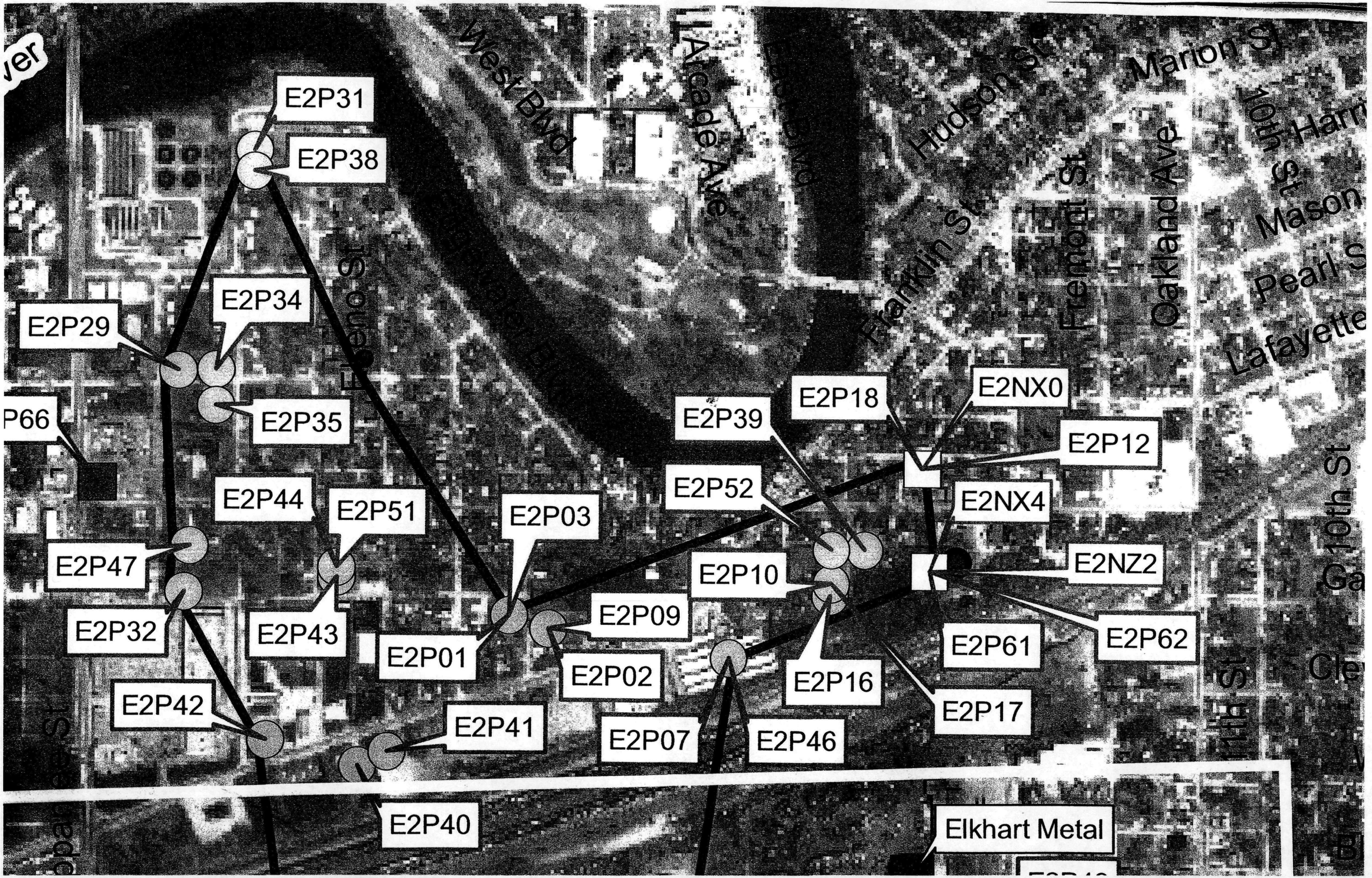
CONCORD TWP

MEISNER AVE.
U.S. 20
AVE.
HIGHLAND
ST.
6-1B
6-1C
TROKEL AVE.
6-1D
AVE.
AVE.
ALBANY ST.
TR. CO.
OKEMA
6-1F
6-1G
TR. CO.
6-1H
P.C.
OAKLAND
U.S. 33 & IND. 19
AVE.
1977
1" = 400'
6-6

18

CFL 21L 40
8-20-65
1" = 660 ft
SR19
Hively
CR20
Franklin
Lusher
17th
CR7
Oakland

SR 19
Franklin
Lasher
Oakland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E2P34
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E2P35
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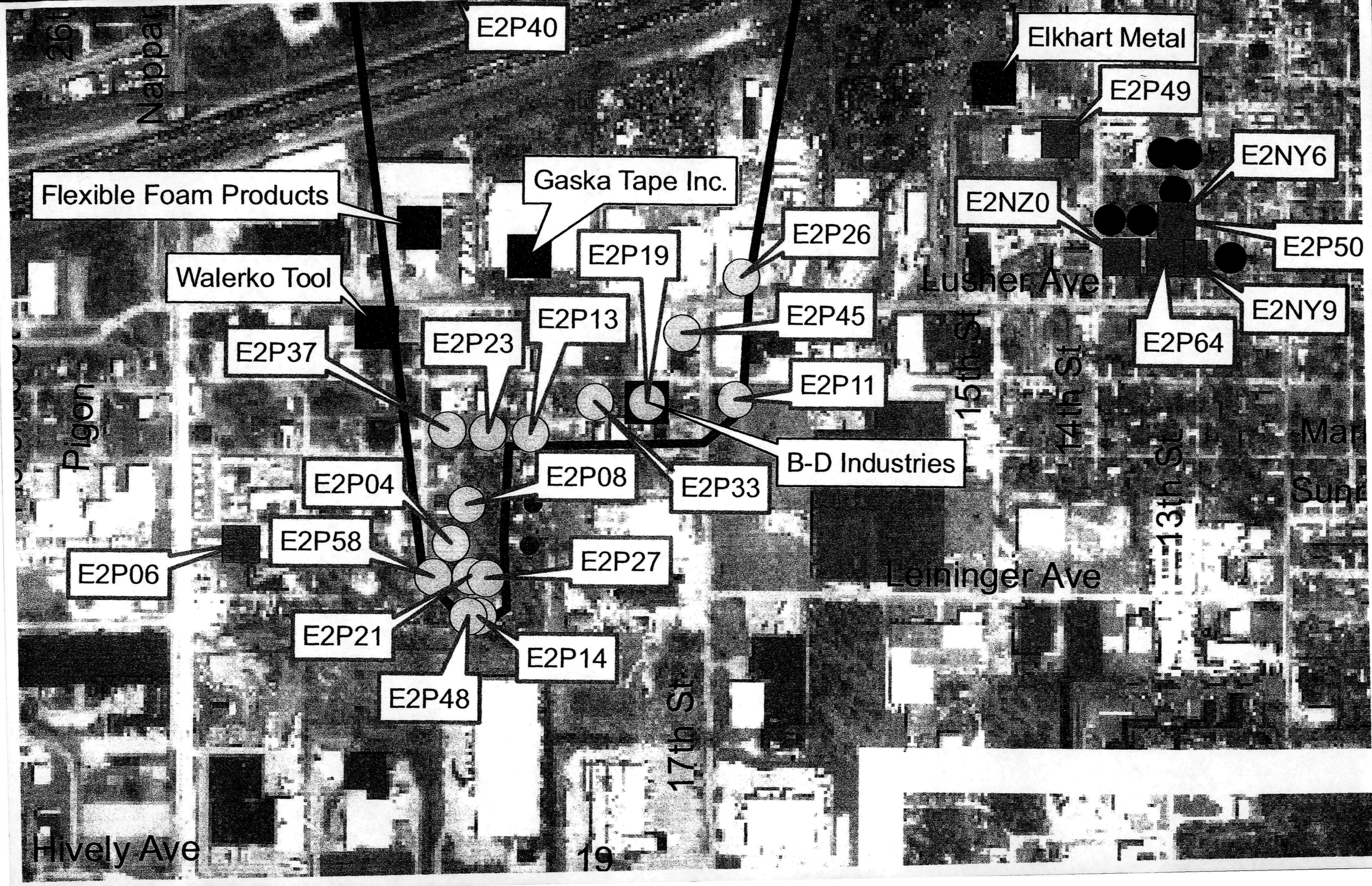
E2P10
E2P09
E2P32
E2P43
E2P01
E2P02
E2P16
E2P61
E2P62
E2P42
E2P41
E2P07
E2P46
E2P17
E2P40
E2P39
E2P18
E2NX0
E2P12
E2NX4
E2NZ2
Elkhart Metal
West Blvd
Arcade Ave
Franklin St
Hudson St
Fremont St
Oakland Ave
Marion St
Mason St
Pearl St
Lafayette St
10th St


E2P40
Elkhart Metal
E2P49
E2NY6
Flexible Foam Products
Gaska Tape Inc.
E2NZ0
E2P26
E2P50
E2P19
Walerko Tool
Lusher Ave
E2P13
E2P45
E2NY9
E2P23
E2P37
E2P64
E2P11
15th St
14th St
Pigon
B-D Industries
E2P04
E2P08
E2P33
13th St
E2P58
E2P06
E2P27
Leininger Ave
E2P21
E2P14
E2P48
17th St
Hively Ave

AVE
ELKHART
HIVELY
NAPPANEE
15th
CORP.
6-18D
6-18C
6-18B
19th
6-18A
AVE.
ST.
ST.
ST.
ST.
AVE
U.S. 33
IND. 19
6-A
LUSHER

1977

1" = 400'

FedEx Express US Airbill

FedEx Tracking Number: 8634 2968 2871

Form ID No. 0215

Recipient's Copy

RECIPIENT: PEEL HERE

1 From This portion can be removed for Recipient's records.

Date 72308 FedEx Tracking Number 863429682871

Sender's Name ARTHUR SIEGAL Phone 248 351-3000

Company JAFFE RAITT HEUER & WEISS

Address 27777 FRANKLIN RD STE 2500 Dept./Floor/Suite/Room

City SOUTHFIELD State MI ZIP 48034-8222

2 Your Internal Billing Reference SIMCO-DISB

3 To

Recipient's Name MS GRACE C/O Phone

Company USEPA REGION 5 (SR-6J)

Recipient's Address 77 W. JACKSON BLVD

We cannot deliver to P.O. boxes or P.O. ZIP codes. Dept./Floor/Suite/Room

Address

To request a package be held at a specific FedEx location, print FedEx address here.

City CHICAGO State IL ZIP 60604-3590

0369157030

8634 2968 2871

RECEIVED 7/24/08

4a Express Package Service *Packages up to 150 lbs.*

- [X] FedEx Priority Overnight — Next business morning.* Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx Standard Overnight — Next business afternoon.* Saturday Delivery NOT available.
- [ ] FedEx First Overnight — Earliest next business morning delivery to select locations.* Saturday Delivery NOT available.
- [ ] FedEx 2Day — Second business day.* Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx Express Saver — Third business day.* Saturday Delivery NOT available.

FedEx Envelope rate not available. Minimum charge: One-pound rate.

* To most locations.

4b Express Freight Service *Packages over 150 lbs.*

- [ ] FedEx 1Day Freight* — Next business day.** Friday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx 2Day Freight — Second business day.** Thursday shipments will be delivered on Monday unless SATURDAY Delivery is selected.
- [ ] FedEx 3Day Freight — Third business day.** Saturday Delivery NOT available.

* Call for Confirmation:

** To most locations.

5 Packaging

- [ ] FedEx Envelope*
- [ ] FedEx Pak* — Includes FedEx Small Pak, FedEx Large Pak, and FedEx Sturdy Pak.
- [ ] FedEx Box
- [ ] FedEx Tube
- [X] Other

* Declared value limit $500.

6 Special Handling Include FedEx address in Section 3.

- [ ] SATURDAY Delivery — Not available for FedEx Standard Overnight, FedEx First Overnight, FedEx Express Saver, or FedEx 3Day Freight.
- [ ] HOLD Weekday at FedEx Location — Not available for FedEx First Overnight.
- [ ] HOLD Saturday at FedEx Location — Available ONLY for FedEx Priority Overnight and FedEx 2Day to select locations.

Does this shipment contain dangerous goods? One box must be checked.

- [X] No
- [ ] Yes — As per attached Shipper's Declaration.
- [ ] Yes — Shipper's Declaration not required.
- [ ] Dry Ice — Dry Ice, 9, UN 1845 ____ x ____ kg
- [ ] Cargo Aircraft Only

Dangerous goods (including dry ice) cannot be shipped in FedEx packaging.

7 Payment *Bill to:* Enter FedEx Acct. No. or Credit Card No. below. Obtain Recip. Acct. No. [ ]

- [X] Sender — Acct. No. in Section 1 will be billed.
- [ ] Recipient
- [ ] Third Party
- [ ] Credit Card
- [ ] Cash/Check

[redacted]

Total Packages [redacted] Total Weight [redacted] Credit Card Auth.

†Our liability is limited to $100 unless you declare a higher value. See the current FedEx Service Guide for details.

8 Residential Delivery Signature Options If you require a signature, check Direct or Indirect.

- [ ] No Signature Required — Package may be left without obtaining a signature for delivery.
- [ ] Direct Signature — Someone at recipient's address may sign for delivery. *Fee applies.*
- [ ] Indirect Signature — If no one is available at recipient's address, someone at a neighboring address may sign for delivery. *Fee applies.*

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