UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 17 2011

REPLY TO THE ATTENTION OF:
West Vermont Drinking Water
SE-5J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: West Vermont Drinking Water Site, Speedway, Indiana Site ID#B5UJ
General Notice of Potential Liability

The United States Environmental Protection Agency (EPA) has documented and investigated releases or threat of release of hazardous substances, pollutants, or contaminants at the West Vermont Drinking Water Site, Speedway, Indiana located in Speedway, Indiana ("West Vermont Drinking Water Site" or "the Site",). The Site is a residential neighborhood in the West Vermont Street and Cossell Road area, comprised of multiple residential parcels.

Since June 2009, the Marion County Health Department (MCHD) has documented vinyl chloride in water samples collected from residential drinking water wells at a maximum concentration of 62.7 micrograms per liter (ug/L), which exceeds EPA's Removal Action Level (RAL) of 2 ug/L.

EPA has reviewed the effects of these hazardous substances, pollutants, or contaminants on the public health, welfare or the environment and concluded that a response action addressing conditions at the Site is necessary to protect the public health, welfare or the environment. EPA has/will expend public funds to take this action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C.§ 9601 *et seq* (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, 100 Stat. 1613 (1986) (SARA), unless EPA determines that such action will be done properly by a responsible party or parties.

Responsible parties under CERCLA include the current and former owners and operators of facilities, persons who generated the hazardous substances, and persons who were involved in the transport, treatment, or disposal of hazardous substances at the Site. Under Section 107(a) of CERCLA, where EPA expends public funds in responding to and cleaning up hazardous

substances, responsible parties are liable for all costs associated with the response action and all other necessary costs incurred in cleaning up the Site, including investigation, planning, and enforcement-related costs.

EPA is currently planning or has performed the following response actions to mitigate threats posed by the presence of hazardous substances at the Site:

1. Develop and implement a Health and Safety Plan;

2. Prepare a detailed work plan to accomplish the project in the most effective, efficient and safe manner;

3. Connect residential properties in the West Vermont Street and Cossell Road area to a municipal drinking water supply.

4. Transport and dispose off-site any hazardous substances, pollutants and contaminants at a CERCLA-approved disposal facility in accordance with EPA's Off-Site Rule (40 CFR § 300.440); and,

5. Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

EPA has received information that your client may have owned or operated a facility near the West Vermont Street and Cossell Road area (the Site) that generated or transported hazardous substances that were disposed of at that facility. By this letter, EPA notifies you of your client's potential liability with regard to this matter and encourages your client, as a potentially responsible party, to agree to reimburse EPA for costs incurred to date and to voluntarily perform or finance the response activities which EPA has determined or will determine are required at the facility. EPA is willing to discuss with your client the entry of an appropriate administrative consent order under which your client would perform or finance response activities and reimburse EPA for its costs. If a consent order cannot be promptly concluded, EPA may issue a unilateral order under Section 106 of CERCLA, requiring your client to perform specified work. Under Sections 106 and 107 of CERCLA, your client may be liable for reimbursement of EPA's costs, for statutory penalties, and for treble damages for noncompliance with such an order. If your client is a qualified small business, enclosed is an EPA Small Business Regulatory Enforcement Fairness Act (SBREA) information sheet which may be helpful if you are subject to an EPA enforcement action.

Because of the conditions described above, EPA believes that response activities at the Site must be initiated as quickly as possible. Therefore, EPA does not intend to utilize the special notice procedures available under Section 122(e) of CERCLA.

As a potentially responsible party, your client should notify EPA in writing within fifteen (15) days of receipt of this letter of your client's willingness to perform or finance the activities

AMMH002604

described above and to reimburse EPA for its costs. The response should be sent to:

Valerie Mullins, Enforcement Specialist
EPA – Region 5
Enforcement Services Section 1
(Mail Code: SE-5J)
77 West Jackson Boulevard
Chicago, IL 60604-3590

If EPA does not receive a timely response, EPA will assume that your client does not wish to negotiate a resolution of their potential responsibility in connection with the Site and that your client declined any involvement in performing the response activities.

Your client's response should indicate an appropriate name, address, and telephone number for further contact. If your client is already involved in discussions with State or local authorities or involved in a lawsuit regarding this facility, your client may continue such activities as they see fit. This letter is not intended to advise your client or direct you to counsel your client to restrict or discontinue any such activities already underway. You are advised; however, to report the status of those discussions or actions that you have with State and local authorities in your response to this letter and to provide a copy of the response to any other parties involved in those discussions or actions.

If you need further information regarding this letter, you may contact Mr. Thomas C. Nash of the EPA, Office of Regional Counsel at 312-886-0552 or Ms. Valerie Mullins of the Enforcement Services Section at 312-353-0324. For technical questions, you may contact EPA On-Scene Coordinator Shelly Lam at (317) 417-0980.

Due to the nature of the problem at this facility and the attendant legal ramifications, EPA strongly encourages your client to submit a written response within the time frame specified here. We hope your client will give this matter immediate attention.

Sincerely yours,

Michael Rebordy for LN

Linda M. Nachowicz, Chief
Emergency Response Branch

cc: Erin Brittain, Indiana Department of Environmental Management

Enclosure: SBREFA

LIST OF PRPs SENT GENERAL NOTICE LETTER

Eric Scroggins, Vice-President
General Counsel
Allison Transmissions
P. O. Box 894
Indianapolis, Indiana 46222

Stephen Evanoff
AIMCO
4582 South Ulster Street Pkwy
Suite 1100
Denver, Colorado 80237

Eric Hilty, Senior Vice-President
General Counsel
AIMCO
Suite 1100
4582 S. Ulster Street Parkway
Denver, Colorado 80237

Bob Lewis
Genuine Parts Company
2999 Circle 75 Parkway
Atlanta, Georgia 30339

Scott Smith, Senior Vice-President
Corporate
Genuine Parts Company
2999 Circle 75 Parkway
Atlanta, Georgia 30339

AMMH002606

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 17 2011

REPLY TO THE ATTENTION OF:
West Vermont Drinking Water
SE-5J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Eric Scroggins, Vice-President
General Counsel
Allison Transmissions
P. O. Box 894
Indianapolis, Indiana 46222

RE: West Vermont Drinking Water Site, Speedway, Indiana Site ID#B5UJ
General Notice of Potential Liability

The United States Environmental Protection Agency (EPA) has documented and investigated releases or threat of release of hazardous substances, pollutants, or contaminants at the West Vermont Drinking Water Site, Speedway, Indiana located in Speedway, Indiana ("West Vermont Drinking Water Site" or "the Site",). The Site is a residential neighborhood in the West Vermont Street and Cossell Road area, comprised of multiple residential parcels.

Since June 2009, the Marion County Health Department (MCHD) has documented vinyl chloride in water samples collected from residential drinking water wells at a maximum concentration of 62.7 micrograms per liter (ug/L), which exceeds EPA's Removal Action Level (RAL) of 2 ug/L.

EPA has reviewed the effects of these hazardous substances, pollutants, or contaminants on the public health, welfare or the environment and concluded that a response action addressing conditions at the Site is necessary to protect the public health, welfare or the environment. EPA has/will expend public funds to take this action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C.§ 9601 *et seq* (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, 100 Stat. 1613 (1986) (SARA), unless EPA determines that such action will be done properly by a responsible party or parties.

Responsible parties under CERCLA include the current and former owners and operators of facilities, persons who generated the hazardous substances, and persons who were involved in the transport, treatment, or disposal of hazardous substances at the Site. Under Section 107(a) of CERCLA, where EPA expends public funds in responding to and cleaning up hazardous

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590
FEB 17 2011

REPLY TO THE ATTENTION OF:
West Vermont Drinking Water
SE-5J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stephen Evanoff
AIMCO
4582 South Ulster Street Pkwy
Suite 1100
Denver, Colorado 80237

RE: West Vermont Drinking Water Site, Speedway, Indiana Site ID#B5UJ
General Notice of Potential Liability

The United States Environmental Protection Agency (EPA) has documented and investigated releases or threat of release of hazardous substances, pollutants, or contaminants at the West Vermont Drinking Water Site, Speedway, Indiana located in Speedway, Indiana ("West Vermont Drinking Water Site" or "the Site",). The Site is a residential neighborhood in the West Vermont Street and Cossell Road area, comprised of multiple residential parcels.

Since June 2009, the Marion County Health Department (MCHD) has documented vinyl chloride in water samples collected from residential drinking water wells at a maximum concentration of 62.7 micrograms per liter (ug/L), which exceeds EPA's Removal Action Level (RAL) of 2 ug/L.

EPA has reviewed the effects of these hazardous substances, pollutants, or contaminants on the public health, welfare or the environment and concluded that a response action addressing conditions at the Site is necessary to protect the public health, welfare or the environment. EPA has/will expend public funds to take this action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C.§ 9601 *et seq* (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, 100 Stat. 1613 (1986) (SARA), unless EPA determines that such action will be done properly by a responsible party or parties.

Responsible parties under CERCLA include the current and former owners and operators of facilities, persons who generated the hazardous substances, and persons who were involved in the transport, treatment, or disposal of hazardous substances at the Site. Under Section 107(a) of CERCLA, where EPA expends public funds in responding to and cleaning up hazardous

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 17 2011

REPLY TO THE ATTENTION OF:
West Vermont Drinking Water
SE-5J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Eric Hilty, Senior Vice-President
General Counsel
AIMCO, Suite 1100
4582 S. Ulster Street Parkway
Denver, Colorado 80237

RE: West Vermont Drinking Water Site, Speedway, Indiana Site ID#B5UJ
General Notice of Potential Liability

The United States Environmental Protection Agency (EPA) has documented and investigated releases or threat of release of hazardous substances, pollutants, or contaminants at the West Vermont Drinking Water Site, Speedway, Indiana located in Speedway, Indiana ("West Vermont Drinking Water Site" or "the Site",). The Site is a residential neighborhood in the West Vermont Street and Cossell Road area, comprised of multiple residential parcels.

Since June 2009, the Marion County Health Department (MCHD) has documented vinyl chloride in water samples collected from residential drinking water wells at a maximum concentration of 62.7 micrograms per liter (ug/L), which exceeds EPA's Removal Action Level (RAL) of 2 ug/L.

EPA has reviewed the effects of these hazardous substances, pollutants, or contaminants on the public health, welfare or the environment and concluded that a response action addressing conditions at the Site is necessary to protect the public health, welfare or the environment. EPA has/will expend public funds to take this action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C.§ 9601 *et seq* (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, 100 Stat. 1613 (1986) (SARA), unless EPA determines that such action will be done properly by a responsible party or parties.

Responsible parties under CERCLA include the current and former owners and operators of facilities, persons who generated the hazardous substances, and persons who were involved in the transport, treatment, or disposal of hazardous substances at the Site. Under Section 107(a) of CERCLA, where EPA expends public funds in responding to and cleaning up hazardous

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 17 2011

REPLY TO THE ATTENTION OF:
West Vermont Drinking Water
SE-5J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Bob Lewis
Genuine Parts Company
2999 Circle 75 Parkway
Atlanta, Georgia 30339

RE: West Vermont Drinking Water Site, Speedway, Indiana Site ID#B5UJ
General Notice of Potential Liability

The United States Environmental Protection Agency (EPA) has documented and investigated releases or threat of release of hazardous substances, pollutants, or contaminants at the West Vermont Drinking Water Site, Speedway, Indiana located in Speedway, Indiana ("West Vermont Drinking Water Site" or "the Site",). The Site is a residential neighborhood in the West Vermont Street and Cossell Road area, comprised of multiple residential parcels.

Since June 2009, the Marion County Health Department (MCHD) has documented vinyl chloride in water samples collected from residential drinking water wells at a maximum concentration of 62.7 micrograms per liter (ug/L), which exceeds EPA's Removal Action Level (RAL) of 2 ug/L.

EPA has reviewed the effects of these hazardous substances, pollutants, or contaminants on the public health, welfare or the environment and concluded that a response action addressing conditions at the Site is necessary to protect the public health, welfare or the environment. EPA has/will expend public funds to take this action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C.§ 9601 *et seq* (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, 100 Stat. 1613 (1986) (SARA), unless EPA determines that such action will be done properly by a responsible party or parties.

Responsible parties under CERCLA include the current and former owners and operators of facilities, persons who generated the hazardous substances, and persons who were involved in the transport, treatment, or disposal of hazardous substances at the Site. Under Section 107(a) of CERCLA, where EPA expends public funds in responding to and cleaning up hazardous

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 17 2011

REPLY TO THE ATTENTION OF:
West Vermont Drinking Water
SE-5J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Scott Smith, Senior Vice-President
Corporate
Genuine Parts Company
2999 Circle 75 Parkway
Atlanta, Georgia 30339

RE: West Vermont Drinking Water Site, Speedway, Indiana Site ID#B5UJ
General Notice of Potential Liability

The United States Environmental Protection Agency (EPA) has documented and investigated releases or threat of release of hazardous substances, pollutants, or contaminants at the West Vermont Drinking Water Site, Speedway, Indiana located in Speedway, Indiana ("West Vermont Drinking Water Site" or "the Site",). The Site is a residential neighborhood in the West Vermont Street and Cossell Road area, comprised of multiple residential parcels.

Since June 2009, the Marion County Health Department (MCHD) has documented vinyl chloride in water samples collected from residential drinking water wells at a maximum concentration of 62.7 micrograms per liter (ug/L), which exceeds EPA's Removal Action Level (RAL) of 2 ug/L.

EPA has reviewed the effects of these hazardous substances, pollutants, or contaminants on the public health, welfare or the environment and concluded that a response action addressing conditions at the Site is necessary to protect the public health, welfare or the environment. EPA has/will expend public funds to take this action pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C.§ 9601 *et seq* (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, 100 Stat. 1613 (1986) (SARA), unless EPA determines that such action will be done properly by a responsible party or parties.

Responsible parties under CERCLA include the current and former owners and operators of facilities, persons who generated the hazardous substances, and persons who were involved in the transport, treatment, or disposal of hazardous substances at the Site. Under Section 107(a) of CERCLA, where EPA expends public funds in responding to and cleaning up hazardous

United States Environmental Protection Agency

Office of Enforcement and Compliance Assurance (2201A)
EPA 300-F-07-003 October 2007

Office of Enforcement and Compliance Assurance
INFORMATION SHEET

U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance resources such as workshops, training sessions, hotlines, websites, and guides to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance, and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

Compliance Assistance Centers

(www.assistancecenters.net)
In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers that provide information targeted to industries with many small businesses.

Agriculture
(www.epa.gov/agriculture or 1-888-663-2155)

Automotive Recycling Industry
(www.ecarcenter.org)

Automotive Service and Repair
(www.ccar-greenlink.org or 1-888-GRN-LINK)

Chemical Industry
(www.chemalliance.org)

Construction Industry
(www.cicacenter.org or 1-734-995-4911)

Education
(www.campuserc.org)

Healthcare Industry
(www.hercenter.org or 1-734-995-4911)

Metal Finishing
(www.nmfrc.org or 1-734-995-4911)

Paints and Coatings
(www.paintcenter.org or 1-734-995-4911)

Printed Wiring Board Manufacturing
(www.pwbrc.org or 1-734-995-4911)

Printing
(www.pneac.org or 1-888-USPNEAC)

Transportation Industry
(www.transource.org)

Tribal Governments and Indian Country
(www.epa.gov/tribal/compliance or 202--564-2516)

US Border Environmental Issues
(www.bordercenter.org or 1-734-995-4911)

The Centers also provide State Resource Locators (www.envcap.org/statetools/index.cfm) for a wide range of topics to help you find important environmental compliance information specific to your state.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

EPA's Home Page
www.epa.gov

Small Business Gateway
www.epa.gov/smallbusiness

Compliance Assistance Home Page
www.epa.gov/compliance/assistance

Office of Enforcement and Compliance Assurance
www.epa.gov/compliance

Voluntary Partnership Programs
www.epa.gov/partners

Recycled/Recyclable
Printed with Soy/Canola ink on paper that contains at least 30% post consumer fiber

AMMH002612

U.S. EPA SMALL BUSINESS RESOURCES

Hotlines, Helplines & Clearinghouses

(www.epa.gov/epahome/hotline.htm)
EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. A few examples are listed below:

Clean Air Technology Center
(www.epa.gov/ttn/catc or 1-919-541-0800)

Emergency Planning and Community Right-To-Know Act
(www.epa.gov/superfund/resources/infocenter/epcra.htm or 1-800-424-9346)

EPA's Small Business Ombudsman Hotline provides regulatory and technical assistance information.
(www.epa.gov/sbo or 1-800-368-5888)

The National Environmental Compliance Assistance Clearinghouse provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers
(www.epa.gov/clearinghouse)

National Response Center to report oil and hazardous substance spills.
(www.nrc.uscg.mil or 1-800-424-8802)

Pollution Prevention Information Clearinghouse
(www.epa.gov/opptintr/ppic or 1-202-566-0799)

Safe Drinking Water Hotline
(www.epa.gov/safewater/hotline/index.html or 1-800-426-4791)

Stratospheric Ozone Refrigerants Information
(www.epa.gov/ozone or 1-800-296-1996)

Toxics Assistance Information Service also includes asbestos inquiries.
(1-202-554-1404)

Wetlands Helpline
(www.epa.gov/owow/wetlands/wetline.html or 1-800-832-7828)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information or the following two resources:

EPA's Small Business Ombudsman
(www.epa.gov/sbo or 1-800-368-5888)

Small Business Environmental Homepage
(www.smallbiz-enviroweb.org or 1-724-452-4722)

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses:

The Small Business Compliance Policy
(www.epa.gov/compliance/incentives/smallbusiness)

Audit Policy
(www.epa.gov/compliance/incentives/auditing)

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an SBA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees, or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.