

**PHASE I ENVIRONMENTAL PROPERTY
ASSESSMENT**

For the

**PROPERTY INCLUDING BECHTEL-MCLAUGHLIN, INC.
AND THE SANDUSKY BAPTIST TEMPLE**

Located at:
**U.S. ROUTE 250 AND STRUB ROAD
SANDUSKY, OHIO**

Prepared For:
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Hull
& associates, inc.

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1.0 INTRODUCTION

1.1 General

Hull & Associates, Inc. (Hull) was authorized by Mr. Jack Richeson (Client) to conduct a Phase I Environmental Property Assessment of A Property consisting of the following: the Bechtel-McLaughlin, Incorporated facility located at 3612 Milan Road; Sandusky Baptist Temple located at 3706 Milan Road; residences located at 3704, 3706B and 3806 Milan Road; and agricultural land in Sandusky, Ohio (hereafter collectively referred to as the Property). The location of the Property is shown on Figure 1 and photographs of the Property are included in Appendix A. All figures referenced in this report are located at the end of the text.

The project was executed under Hull project number HEM078, and was conducted by Hull from October 2002 through December 2002. Hull representative, Mr. Adam Altman, Scientist II, Karyn Selle, Hydrogeologist I, and Ms. Kelly Kester, Engineer I, conducted this assessment. The Phase I Property Assessment was prepared in accordance with the requirements of the Ohio Voluntary Action Program (VAP), Ohio Revised Code Chapter 3746, codified at Ohio Administrative Code (OAC) 3745-300-06.¹

1.2 Purpose

The purpose of a Phase I Property Assessment under OAC 3745-300-06 is to determine: (1) if identified areas exist at a property;² (2) whether a property is eligible for participation in Ohio's Voluntary Action Program (VAP); and, (3) the necessity for and initial scope of a Phase II Property Assessment.³

The Phase I Assessment was based on information gained by Hull personnel from the following sources: review of public documents, files, photographs, and maps; correspondence with regulatory agencies; review of an environmental regulatory database search report; review of reports of previous assessments conducted at the Property; and a reconnaissance of the Property.

¹ OAC 3546-300-06 describes the procedures for conducting a Phase I Property Assessment under Ohio's Voluntary Action Program (VAP).

² OAC 3745-300-01 (A)(22) defines an identified area as any location at a property at which hazardous substances or petroleum are known or suspected to be present.

³ OAC 3546-300-07 describes the procedures for conducting a Phase II Property Assessment under the VAP.

1.3 Property Description

The Property is located within the City of Sandusky, in Erie County, Ohio and consists of approximately 55.4 acres. The Property consists of the Bechtel-McLaughlin facility, the Sandusky Baptist Temple, farmland, and residential dwellings. Agricultural land on the Property is located to the northeast of the Bechtel-McLaughlin facility and the Sandusky Baptist Temple. The land use surrounding the Property is a mix of commercial, agricultural, and residential dwellings. Additionally, the Meadowlawn School and the Ohio Veterans Home are located to the southeast and southwest of the Property, respectively. The topography of the Property is relatively flat. A Property plan showing pertinent property features and surrounding properties is provided on Figure 2 and Figure 3.

2.0 HISTORICAL AND CURRENT USES OF THE PROPERTY

2.1 Ownership and Occupancy

Property ownership information was obtained by reviewing conveyance records on file at the Erie County Recorder's and Auditor's offices. A legal description and deed for the Property are included in Appendix B-1. Copies of the tax map, and available Property ownership documentation are provided in Appendix B-2. The following transfers were recorded for the Property:

3612 Milan Road:
Parcel # Map 7, Section 2, Lot 39

Date	Grantor	Grantee
1950	Unknown	Ronald W. and Gwyneth H. Bechtel
3-31-50	Ronald W. and Gwyneth H. Bechtel	Ronald W. Bechtel
9-6-57	Ronald W. Bechtel	Ronald W. and Lydia R. Bechtel
11-28-72	Ronald W. and Lydia R. Bechtel	Bechtel-McLaughlin, Inc.
11-30-84	Bechtel-McLaughlin, Inc.	B & F Properties

Parcel # Map 7, Section 2, Lot 40

Date	Grantor	Grantee
1957	Unknown	Ronald W. Bechtel
5-22-59	Ronald W. Bechtel	Ronald W. and Lydia R. Bechtel
11-28-72	Ronald W. and Lydia R. Bechtel	Bechtel-McLaughlin, Inc.
11-30-84	Bechtel-McLaughlin, Inc.	B & F Properties

3706 Milan Road:

Date	Grantor	Grantee
Unknown	Unknown	Amelia Mills
6-26-24	Amelia Mills	Amelia and William Mills
8-21-53	Amelia and William Mills	Amelia Mills
12-3-53	Amelia Mills	Orville and Helen Whitney
3-28-56	Orville and Helen Whitney	Helen Whitney
7-18-62	Helen Whitney	Meadowbrook Baptist Church

3806 Milan Road:

Date	Grantor	Grantee
Unknown	Unknown	Orville H. and Helen E. Whitney
4-3-53	Orville H. and Helen E. Whitney	Genevieve A. Miller

The Village Polk and the Haines directories were reviewed at the Carnegie Public Library in Sandusky. Bechtel-McLaughlin, Incorporated was listed as the occupant of the Property since 1955. The majority of the surrounding properties have been listed as residential.

2.2 Historic Property Usage

To determine the historical use of the Property, building permits, zoning information, utility information, Sanborn Fire Insurance Maps, and aerial photographs were reviewed.

2.2.1 Building Permits and Zoning Information

The Perkins Township Building Department was contacted to review building permits for indications of structures or equipment that may have affected the environmental condition of the Property (i.e., underground storage tanks (USTs), aboveground storage tanks (ASTs), etc.). No records were available for the Property.

Zoning information for the Property was provided by Perkins Township Zoning Commission. The Property is zoned I-1 for light industrial use, C-2 for general commercial, and R-1A for residential.

2.2.2 Utility Information

Water service is supplied by Erie County Water, sewer service is provided by Erie County Sewer, electricity is provided by Ohio Edison, and gas service is provided by Columbia Gas. The approximate location of these utilities is shown on Figure 2.

2.2.3 Sanborn Fire Insurance Map Review

Sanborn Fire Insurance Maps were requested from *Environmental Data Resources, Inc.* (EDR) for review in determining past usage of the Property and adjacent properties. Sanborn Map coverage for the Property was not available.

2.2.4 Aerial Photograph Review

Aerial photographs obtained from the Ohio Department of Transportation (ODOT) were reviewed to aid in determining past usage of the Property and adjacent properties. Photographs were reviewed for the years 1950, 1956, 1960, 1964, 1966, 1973, 1974, 1977, and 1988. Copies of these aerial photographs are provided in Appendix B-3.

<u>Date/ Scale</u>	<u>Property Description</u>
1950/1"=400'	The Property appears to be used for agricultural purposes and residential dwellings. Several residential dwellings exist along Milan Road. The Bechtel-McLaughlin facility has not yet been constructed in this photograph. The rest of the Property appears to be open, grassy areas or farmland. The adjacent properties appear to be residential houses and open farmland.
1956/1"=400'	One large building has been constructed (current Bechtel-McLaughlin facility) between two residential dwellings. Parking areas are located southwest and northeast of the large building. A pit or surface impoundment can be seen behind the large building. This pit/impoundment appears to drain to a wooded ditch area. The remaining portion of the Property is open grassy areas or farmland. The adjacent areas appear similar to the previous photograph.
1960/1"=400'	An addition has been constructed onto the northeast corner of the Bechtel-McLaughlin facility. Parking areas can be seen south and east of the facility building. The pit/surface impoundment identified above is less prominent and the area appears to be vegetated. A second smaller pit/surface impoundment can be seen northeast of this one. A school appears adjacent and at the southeast end of the Property. The remainder of the Property and the adjacent areas appear similar to the previous photograph.
1964/1"=400'	A new addition has been added to the northeast side of the Bechtel-McLaughlin facility. A third pit/surface impoundment can be identified adjacent and southeast of the area identified in the 1956 photograph. The second pit identified above in the 1960 photograph can no longer be seen. A church now appears on the Property, southeast of the Bechtel-McLaughlin facility. The remainder of the Property and the adjacent areas appear similar to the previous photograph.
1966/1"=400'	Another addition has been constructed onto the northeast side of the Bechtel-McLaughlin facility. The surface impoundment/fill area identified in the 1964 photograph can again be identified. The remainder of the Property and the adjacent areas appear similar to the previous photograph.
1973/1"=400'	Several additions have been made to buildings on the Property including additions to the church and the Bechtel-McLaughlin facility. The remainder of the Property and the adjacent areas appear similar to the previous photograph.

- 1974/1"=400' The Property and adjacent areas appear to be similar to the previous photographs.
- 1977/1"=400' The Property and adjacent areas appear to be similar to the previous photographs.
- 1988/1"=400' A new addition appears to have been added to the Bechtel-McLaughlin facility. This addition appears to extend through the area where the pits/surface impoundments were located on the previous photographs. The footprint of the church has also changed. The remainder of the Property and the adjacent areas appear similar to the previous photograph.

2.3 Current Property Usage

The Property consists of the Bechtel-McLaughlin facility, the Sandusky Baptist Temple, farmland, and houses located at 3704, 3706B, and 3806 Milan Road (U.S. 250).

more databases, but do not have enough address information to be located by *EDR*. The orphan facilities are discussed in Section 3.4.5.

Documents have been reviewed to determine topographical, geological and hydrogeological conditions in the area of the Property for determining whether releases from facilities identified in the databases may potentially affect the Property. Regional geology and hydrogeology is discussed further in Section 3.4.4.

3.2.1 United States Environmental Protection Agency

A review of the U.S. EPA databases identified 23 facilities within the specified search distance. There were nine Facility Index System (FINDS) sites and fourteen RCRA Small Quantity Generators (SQG) within the search radii.

There were no National Priority List (NPL) sites, Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) facilities, CERCLIS - No Further Remedial Action Planned (CERCLIS-NFRAP) facilities, Corrective Action Report (CORRACTS) facilities, RCRA transportation, storage, or disposal (TSD) facilities, Resource Conservation and Recovery Act (RCRA) Large Quantity Generators (LQG), Emergency Response Notification System (ERNS) facilities, Hazardous Materials Information Reporting System (HMIRS) facilities, Material Licensing Tracking System (MLTS) facilities, Toxic Release Information System (TRIS) reporters, or Polychlorinated Biphenyl (PCB) Activity Database System (PADS) facilities listed within the specified search radius. The facilities identified within the specified search radii are provided in the Map Findings section of the *EDR* report (Appendix D).

Bechtel-McLaughlin, Inc. is listed as a CERCLIS - No Further Remedial Action Planned (CERCLIS-NFRAP) facility, a Corrective Action Report (CORRACTS) facility, a Resource Conservation and Recovery Act (RCRA) transportation, storage, or disposal (TSD) facility, a RCRA Large Quantity Generator (LQG), a Facility Index System (FINDS) site, a RCRA Administrative Action Tracking Site (RAATS), and a Toxic Release Information System (TRIS) reporter in the databases.

3.2.2 Ohio Environmental Protection Agency

There are no facilities identified in the Ohio EPA State Hazardous Waste Sites (SHWS) database by *EDR* within the search radii. There are two Ohio State Landfills identified by *EDR* within the search radii. Corso's Flower & Garden, located approximately up-gradient $\frac{1}{4}$ to $\frac{1}{2}$ mile

west of the Property, at 3404 Milan Road is listed as a Composting Facility. Ohio Veteran's Home, located up-gradient ½ to 1 mile west/southwest of the Property, at 3416 South Columbus Avenue is also listed as a Composting Facility.

The State of Ohio Environmental Protection Agency was contacted to obtain information regarding spills or any other environmental problems associated with the Property. The following files were reviewed at the Ohio EPA – North West District Office:

1. A letter dated May 12, 1969 from Mr. Dan C. Armbruster, Chief of the Ohio Division of Wildlife to Mr. Theodore F. Lauber, President of Bechtel-McLaughlin, Incorporated states that the division had investigated a pollution instance in Second Creek. In the inspection it was found that industrial waste emanating from Bechtel-McLaughlin had killed ducks, fish, and muskrats. The location of Second Creek relative to the Property was not provided in this document.
2. Notes on an Inspection of Industrial Waste Treatment Facilities at Bechtel-McLaughlin, Incorporated in Erie County dated August 14, 1969 notes the following issues at the Property:
 - All plating wastes were being discharged without treatment.
 - The sodium hypochlorite pump was not operating and the sulfur dioxide gas cylinder had been disconnected.
3. A newspaper article from the Sandusky Register dated February 18, 1971 states that, after pressure and criticism from state officials and county health inspectors over the facility's discharges to a drainage tile at the Property, Bechtel-McLaughlin was nearing completion of a \$140,000 treatment system. The facility was reported to have dumped its untreated waste into a drainage tile that was originally built for the Ohio Soldiers and Sailors Home (OSSH) of Sandusky. The facility had legal rights at this time to use the underground tile. The tile feeds into Second Creek marsh. The exact location of the outfall was not provided; however, based on aerials, it appears to be located approximately 2,500 feet northeast of the Bechtel-McLaughlin facility. The new treatment system was expected to neutralize chromium, cyanide, and acid-alkali liquid pollutants from the plant, send the neutralized solutions to a settling basin for more treatment, purify up to 75% of the basin's product to be recycled into the plant, and send the remaining 25% into lagoons where solids will settle and "water safe for fish" will spill into the drainage tile.
4. An Initial Pollution Report Form dated March 25, 1971 indicates that a "bad" spill occurred from Bechtel-McLaughlin. The form states that cyanide or chromium or both came through the drainage tile discussed above out into a field located between Perkins Avenue and State Route 6.
5. An Ohio Department of Health Memorandum dated March 30, 1971 indicates that the owner of the property through which the discharge from Bechtel-McLaughlin was flowing notified the Northwest District Office of pollution coming from the company. When inspected, the receiving stream appeared light green and after

the stream had entered Sandusky Bay a yellowish-green color was noted in a 200-foot radius from the stream discharge point. Inspection of the system by Bill Sheets, Plant Manager revealed a rupture in part of the chromium reduction system. Untreated hexavalent chromium waste was entering a floor drain that discharges to the stream. Partial analyses of a receiving stream sample indicated chromium at 3,940 ug/l, cyanide at 7,009 ug/l, copper at 840 ug/l, and zinc at 12,000 ug/l.

6. Notes on an Inspection Trip to Bechtel-McLaughlin, Sandusky, dated May 20, 1971 notes the following pertinent issues at the Property:

- Pools of concentrated chromium solution were located in the company's solid waste dumping area.
- Piping from the manufacturing building to the new industrial waste treatment system had not been covered and approximately 40 feet of the acid-alkali sewer had been laid backwards.
- An abandoned process sewer was noted in the bottom of the trench parallel to the new industrial acid-alkali sewer.
- The new acid-alkali process sewer was entering the new holding tank approximately one foot from the bottom of the holding tank, thus eliminating the usefulness of the tank capacity and causing the contents of acid or alkali tanks to back up into the manufacturing building when they are being dumped.
- The chromium and cyanide wastes were being discharged to the old system from which the wastes were being pumped through flexible hoses to the new chromium and cyanide holding tanks that was necessary because of the improper elevation of the holding tanks.
- Inspection of the clarifier revealed floc carryover into the discharge line.
- Although the new system had been designed to allow reclamation of part of the treated effluent, all effluent was being discharged to the stream until the new system was operating efficiently.
- A process area containing acid-alkali waste was discovered which was tied into the storm sewer system instead of the industrial waste treatment system.

7. Notes on a visit to Bechtel-McLaughlin in Sandusky dated June 4, 1971 notes the following issues at the Property:

- Several by-passes, leaks, and inefficiencies were discovered. The main sewer leading to the new treatment plant was leaking into the old plant sewer and, therefore, by-passing untreated. Also tied into the old sewer was some flow from a phosphatizing operation.
- There had been a large chromium spill at the facility from a ruptured valve on a drag-out line that occurred on May 31. Although the chromium apparently entered the acid-alkali sump and the cyanide sump where it was batch

treated, a portion of the spill would have undoubtedly leaked into the old sewer and by-passed the treatment plant.

8. Notes on a visit to Bechtel-McLaughlin in Sandusky dated June 21, 1971 notes the following issues at the Property:
 - Pools of what appears to be concentrated chrome solution were located at the back of the plant.
 - A large acid-alkali line at the plant was installed backwards and was leaking.
 - The small acid-alkali line had developed a leak that was flowing in the trench to the emergency holding lagoon. It was noted that this water had deposited yellowish-green solids in the trench. The contents of this lagoon were being pumped daily to the acid-alkali sump.
 - Liquid containing yellowish-green solids in suspension which by-passes the treatment system and gets into the storm sewer had been noted flowing over the ground at the back of the plant for a distance of about 40 feet and was reported to be acid-alkali waste.
 - The sludge lagoon had developed a break and the liquid was noted to be pooled over an area at the back of the plant.
 - Some floc carryover was noted in the clarifier.
9. A letter dated July 12, 1971 from T. A. Gardner, Chairman of the Water Pollution Control Board at the State of Ohio Department of Health to Mr. Theodore F. Lauber of Bechtel-McLaughlin, Incorporated orders the plant to immediately cease and desist its discharge of industrial wastes into waters of the state.
10. A letter dated July 12, 1971 from Mr. John Ohlemacher of Bechtel-McLaughlin, Incorporated to Mr. George H. Eagle, Chief Engineer of the Division of Engineering states that a leak developed in the chrome dragout on May 31, 1971. The release consisted of approximately 450 gallons of 12 ounce/gallon chromic acid solution which flowed into the chrome and acid-alkali drains. The spill was caught in the sump tanks and was treated in the sumps before being pumped to the treatment system.
11. Notes on a visit to Bechtel-McLaughlin in Sandusky dated August 27, 1971 notes the following issues at the Property:
 - A large acid-alkali line at the plant was installed backwards and this line along with the small acid-alkali line had sprung numerous leaks.
 - Although trenches in the plant have been completed to allow the liquid wastes from the barrel area to be treated, these waters presently discharge behind the plant to the storm sewer due to grade problems.
 - Concrete sumps will be in use in about four weeks to replace the improperly installed steel tanks.

- The sludge lagoon was filled to the point of overflowing liquid onto the ground at the back of the plant.
 - A considerable floc carryover was noted in the clarifier.
12. Notes on a visit to Bechtel-McLaughlin in Sandusky dated September 10, 1971 notes the following issues at the Property:
- Tile was installed to convey the acid-alkali wastes from the barrel area to the waste treatment plant.
 - Cyanide and chromium wastes from the barrel area can still overflow to the storm sewer.
 - During the inspection, water, which was flowing over the ground at the back of the plant, was 40% effluent that is sent through reclaim filters.
 - Contents of the sludge lagoon were observed over a large area at the back of the plant.
 - Large floc carryover was noted in the clarifier.
13. A Permit Violations/Self-Monitoring Reports letter dated March 15, 1978 from the Ohio EPA to Mr. Ohlemocher of Bechtel-McLaughlin, Incorporated indicates the effluent violations for copper, free cyanide, pH, total flow, zinc, and chromium. The letter states that the violations seem to be a continuing problem though some of the violations would be eliminated when the proposed NPDES renewal came out.
14. A Department of Natural Resources – Division of Water Initial Pollution Report outlines a chromium and chromate spill that occurred on December 15, 1981 at Bechtel-McLaughlin, Incorporated. The letter adds that the water in Second Creek was green in color.
15. An Ohio EPA District Office Investigation Report outlines a spill that occurred on December 15, 1981 at Bechtel-McLaughlin, Incorporated. The report states that 20 gallons of chromium, cobalt, and nickel plating waste constituted a minor spill at the Property.
16. An Ohio EPA District Office Investigation Report completed on December 16, 1981 outlines a spill that occurred on December 15, 1981 at Bechtel-McLaughlin, Incorporated. The report states that 20 gallons of chromium plating waste was spilled, that there was a very light green discoloration of the water in a nearby ditch, and that the spill affected a $\frac{3}{4}$ mile length of area at the Property.
17. An Ohio EPA District Office Investigation Report completed on December 16, 1981 outlines a spill that occurred on December 15, 1981 at Bechtel-McLaughlin, Incorporated. The report states that a 30,000-gallon spill of 0.2 ppm chromic acid solution occurred due to a tank leak and affected a $\frac{3}{4}$ mile area at the Property.

18. A letter dated August 12, 1983 from Mr. Theodore F. Lauber, President of Bechtel-McLaughlin, Incorporated to Mr. F. H. Taylor of the Ninth District Coast Guard addresses a discrepancy with Ohio EPA files regarding a spill. The discrepancy is stated as the difference between a 30,000-gallon chrome spill and a 30,000-gallon treated water spill.
19. A letter dated August 26, 1983 from Mr. F. H. Taylor, Hearing Officer of the United States Coast Guard to Mr. Higgins of the Ohio EPA – Northwest District Office addresses a December 15, 1981 chromic acid spill at the Bechtel-McLaughlin facility. The letter states that the agency file reports 30,000 gallons of 5% solution was spilled but that the facility argued that there was a discrepancy in the amount of chromic acid spilled.
20. An Ohio EPA Inter Office Communication dated January 27, 1984 states that the RCRA Closure Plan for the Surface Impoundment located at the Property was approved by the Director on September 29, 1983. Certification of Closure was received by the Ohio EPA on January 12, 1984. This impoundment was approximately 40 feet by 75 feet by 4 feet deep and was used to store metal hydroxide sludge (F006); however, cyanide was also present. The impoundment sits on top of limestone bedrock and was not lined.
21. A Report on an Inspection at Betchel-McLaughlin dated May 3, 1984 noted the following:

Five RCRA aboveground tanks were removed and certification was complete. These tanks were used to store spent plating bath solutions (F007) and spent stripping and cleaning bath solutions (F009).

Two RCRA aboveground tanks remained in service and are located adjacent to the barrel storage. These tanks store both F007 and F009 wastes.

Sludge from the plating baths (F008) are stored in 55-gallon drums.
22. A letter dated April 29, 1986 from the Ohio EPA to Mr. John K. Ohlemacher, Assistant Plant Manager at Bechtel-McLaughlin, Incorporated states that the January and February, 1986 monthly operating report for the facility was reviewed. The letter states that violations were found in total zinc, free cyanide, total chromium, and total zinc concentrations from the facility's outfall.
21. A letter dated June 26, 1986 from Ms. Kathryn S. McKibben, Environmental Scientist at the Ohio EPA to Mr. John K. Ohlemacher, Assistant Plant Manager at Bechtel-McLaughlin, Incorporated states that the April, 1986 monthly operating report for the facility was reviewed. The letter states that violations were found in total chrome concentrations from the facility's outfall.
22. A letter dated July 29, 1986 from Ms. Kathryn S. McKibben, Environmental Scientist at the Ohio EPA to Mr. John K. Ohlemacher, of Bechtel-McLaughlin, Incorporated states that the May, 1986 monthly operating report for the facility was reviewed. The letter states that a violation was found in total copper concentrations from the facility's outfall.

23. A letter dated November 21, 1986 from the Ohio EPA to Mr. John Ohlemacher of Bechtel-McLaughlin, Incorporated states that the September, 1986 monthly operating report for the facility was reviewed. The letter states that violations were found in total copper concentrations from the facility's outfall.
24. A letter dated November 28, 1986 from Mr. Mark W. Smith, Environmental Manager of Bechtel-McLaughlin, Incorporated to Ms. Kathryn S. McKibben of the Ohio EPA – Division of Water Pollution Control responds to a letter dated November 21, 1986 concerning violations for total copper at the Property. The letter states that a chemical additive was found to be causing the violations and that the chemical was taken out of the process at the facility.
25. A letter dated April 17, 1987 from the Ohio EPA to Mr. Mark W. Smith, Environmental Manager of Bechtel-McLaughlin, Incorporated states that the February, 1987 monthly operating report for the facility was reviewed. The letter states that two cyanide concentration values were missing and that there were no values recorded for total recoverable hexavalent chromium.
26. A Potential Hazardous Waste Site Preliminary Assessment dated June 10, 1988 states that Bechtel-McLaughlin, Incorporated is an active RCRA and NPDES facility in operation since 1945. The company does metal plating using copper, chromium, cadmium, zinc, and nickel and generates waste streams with high concentrations of metallic salts. The assessment explains that the contaminated sludges were disposed of in a surface impoundment at the Property for an unknown period of time and the impoundment, along with five above-ground spent plating/stripping solution storage tanks were closed in November of 1983. Effluent wastewater was being discharged into Second Creek with numerous violations having had occurred.
27. A report dated September 30, 1991 outlining Final Closure Activities for Bechtel-McLaughlin, Incorporated was submitted by Mr. Greg E. Stayanchi, President of North Coast Environmental, Incorporated to Mr. Rod Miller of the Ohio EPA. The report documents the closure of two storage tanks, a waste treatment sludge dumpster pad, and a drummed cyanide waste area.
28. A news release dated October 15, 1992 from the Ohio EPA announces that Bechtel-McLaughlin has agreed to pay the Ohio EPA a \$15,000 settlement for hazardous waste violations. Among the violations during a January 19, 1991 inspection were failure to:
 - label and date hazardous waste containers;
 - provide adequate training for employees involved with hazardous waste;
 - transfer hazardous waste to containers in good condition;
 - have a complete contingency plan which facility personnel could follow to respond to fires, explosions, or unplanned sudden or non-sudden releases of hazardous waste;
 - provide secondary containment for tanks storing hazardous waste; and

- document inspection of hazardous waste storage tanks.
29. A letter dated April 2, 1993 from Thomas Crepeau of the Ohio EPA to John Ohlemacher of Betchel-McLaughlin indicates that the Director had approved the closure of the two hazardous waste tanks and the two hazardous waste storage areas discussed above in Item 27. The letter further indicates that the facility will maintain the status of a generator of hazardous waste with less than 90 day storage.
 30. A letter dated February 7, 1994 from Mr. Abdur Rahim of the RCRA Engineering Section – Division of Hazardous Waste Management to Mr. John Ohlemacher, President of Bechtel-McLaughlin, Incorporated declares that Bechtel-McLaughlin is no longer a permitted hazardous waste facility.
 31. A 30-Day Report regarding a discharge to Taylor Ditch that occurred on October 17, 1996 was submitted by Crittenden J. Ohlemacher, VP of Technical Operations to Mr. Mike Gerber of the Ohio EPA – Division of Emergency & Remedial Response on November 16, 1996. The report gives the chronology of events from October 17, 1996 to November 14, 1996. A sample was taken from Taylor Ditch on October 17, 1996, several feet downstream from the storm sewer outfall at Oakland Cemetery and was found to contain 7,990 ug/l of zinc. After several remediation steps were implemented, a sample was taken from Taylor Ditch on October 18, 1996, several feet downstream from the storm sewer outfall and was found to contain 100 ug/l of zinc.
 32. An Equivalency Demonstration Letter dated April 8, 1997 from Thomas Manning of the U.S. EPA to Crittenden Ohlemacher of Bechtel-McLaughlin discusses deficiencies regarding the equivalence demonstration for the closed surface impoundment. The U.S. EPA indicated that MW-1 was not properly located to suffice as an up-gradient monitoring well (i.e., may be installed within the limits of the surface impoundment). U.S. EPA granted approval to pursue a Voluntary Action that would incorporate a facility wide investigation.
 33. A letter dated October 15, 1998 from Mr. Eric Getz of the Ohio EPA – Division of Hazardous Waste Management to Mr. Crittenden Ohlemacher, Vice President of Bechtel-McLaughlin, Incorporated discusses a violation found at the Property on August 21, 1998 during a hazardous waste compliance evaluation inspection. The letter states that Bechtel-McLaughlin has not thoroughly evaluated its wastes to determine if they exhibit any hazardous characteristics or are listed as hazardous waste. Fifty 55-gallon drums were noted near the wastewater treatment system at the time of inspection. Some of these drums were labeled with a description of their contents and some were not labeled at all. Some of the drums labeled with a description of their contents were as labeled hazardous waste.
 34. A letter dated February 16, 1999 from Mr. Eric Getz of the Ohio EPA – Division of Hazardous Waste Management to Mr. Crittenden Ohlemacher, Vice President of Bechtel-McLaughlin, Incorporated discusses a violation found at the Property on August 21, 1998. The letter states that Bechtel-McLaughlin has been returned to compliance.
 35. A letter dated April 17, 2001 from Mr. Charles Ohlemacher, President of Bechtel-McLaughlin, Incorporated to Mr. Ed Lim of the Ohio EPA – Central Office

addresses a Director's request, dated February 26, 2001, to modify the facility's Hazardous Waste Facility Post-Closure Plan regarding the surface impoundment. The letter states that the surface impoundment was last used in 1979 and subsequently closed in 1983.

An Ohio EPA inter-office communication dated August 30, 2001 from Mr. Chad Zajkowski of the Ohio EPA – Division of Drinking and Groundwaters to Ms. Shannon Nabors of the Ohio EPA – Division of Hazardous Waste Management addresses a RCRA Equivalency Demonstration prepared by Bechtel-McLaughlin Incorporated. The letter indicates that in October 1995, Bechtel-McLaughlin submitted the RCRA Equivalency Demonstration as required by the U.S. EPA to determine if closure activities at the surface impoundment area meet the requirements of 40 CFR Part 264. As part of these requirements, four monitoring wells (MW-1 through MW-4) were installed and sampled. Based on the results of groundwater samples, the Ohio EPA recommended that the Director not approve the equivalency demonstration that a source other than the surface impoundment caused the elevated concentrations in the up-gradient well (MW-1). Exceedences in both the up and down gradient wells were noted for zinc, cadmium, nickel, and tetrachloroethene.

A copy of the reports and correspondences are included in Appendix E.

3.2.2.1 Ohio Spills

The EDR Report identified five Ohio Spills sites (SPILLS) within the specified radius of 1.0 mile of the Property. Two of the SPILLS sites are located over ¼-mile to the west/northwest and south of the Property. One SPILLS site is located over ¼-mile to the east of the Property. A SPILLS site borders the Property at 1112 East Strub Road. This was a gasoline spill of unknown size that occurred in June of 1992. The remaining SPILLS site is located less than ¼-mile west of the Property at 3404 Milan Road. This was a small diesel fuel leak that occurred in June of 1992. Based on the distances of these sites from the Property and/or the affected media, a release from these sites would not likely affect the Property.

Hull also submitted a request to the Ohio EPA Division of Remedial Response (DERR) for a current list of spills or releases for the Property in Erie County.⁴ Ms. Cindy Lewis of the Ohio EPA DERR responded that no files were found for the Property.⁵ Correspondence with the Ohio EPA is included in Appendix F.

3.2.3 Bureau of Underground Storage Tank Regulations

The EDR Report did not identify any USTs or LUSTs at the Property. Information was also available on facilities within the specified search distance. The Bureau of Underground Storage

⁴ Ms. Cindy Lewis, Ohio EPA DERR, facsimile, November 12, 2002.

Tank Regulations (BUSTR) was contacted as a quality assurance check and to further clarify information on both leaking and registered USTs in the area.⁶ Ms. Nancy Caldwell of BUSTR stated that no BUSTR files were found relevant to the Property.⁷

3.2.3.1 Registered Underground Storage Tanks

Five facilities were identified by *EDR* with registered USTs within the specified search radius of 1.000-mile of the Property. Two of the UST containing facilities were identified within ¼-mile and upgradient of the Property.

3.2.3.2 Leaking Underground Storage Tanks

The *EDR* report identified 16 LUST facilities within the specified search radius of 1.0-mile of the Property. Three of the LUSTs are located topographically and hydraulically up-gradient from the Property and are approximately ¼ to ½-mile from the Property. Eight of the LUSTs are topographically and hydraulically upgradient from the Property and are approximately ½ to 1 mile from the Property. The final five sites are located topographically and hydraulically down-gradient from the Property and are approximately ½ to 1 mile from the Property. Based on the distance of these sites from the Property and regional geologic conditions, a release from these LUST sites would not have affected the Property.

3.2.3.3 Environmental Database Summary

Based on a review of the databases provided by the U.S. EPA, Ohio EPA, and BUSTR, along with local hydrogeological conditions (i.e., anticipated groundwater flow direction), potential or known releases from the following facility may have affected the Property:

- Bechtel McLaughlin, Incorporated, the subject Property, is listed as a CERCLIS-NFRAP site discovered in September of 1984 and archived in December of 1995. The Property is also listed as a CORRACTS facility that was assigned a low corrective action priority in March of 1994. The Property is listed as a RCRIS-TSD and a RCRIS-LQG with 54 violations found from 5/6/81 to 2/16/99. The facility is also listed in the TRIS and as a DERR facility. Other information suggests that the facility no longer operates any of its hazardous waste permits; however, closure may not be complete for the former surface impoundment area.

⁵ Ms. Cindy Lewis - Ohio EPA DERR, facsimile, November 15, 2002.

⁶ Ms. Sue Kist, BUSTR, correspondence, November 12, 2002.

⁷ Ms. Nancy Caldwell, BUSTR, correspondence, November 13, 2002.

3.2.4 Coal Gas Sites

There were no former manufactured gas (coal gas) facilities listed by the EDR database within the specified search radii.

3.2.5 Ohio Department of Natural Resources Water Well Log Information

The Ohio Department of Natural Resources (ODNR) Division of Water was contacted to obtain copies of logs of private water wells, public water wells, and monitoring wells documented within ½-mile of the Property boundary.⁸ The ODNR water well logs indicate that there are no wells located within ½-mile of the Property.⁹

3.3 Local and Other State Environmental Records

3.3.1 Local Fire Department

The Sandusky Fire Department was contacted to obtain information regarding fires, unauthorized discharges, spills, or any environmental problems involving toxic or hazardous materials at the Property.¹⁰ The City of Sandusky Fire Department has not responded to Hull's request to date. If this information is received within 90 days of our request, and changes the conclusions of this assessment, Hull will submit an addendum to this report.

3.3.2 State and Local Health Departments

The State of Ohio Health Department was contacted to obtain information regarding spills or any other environmental problems involving toxic or hazardous substances associated with the Property.¹¹ The State of Ohio Health Department has not responded to Hull's request to date. If this information is received within 90 days of our request, and changes the conclusions of this assessment, Hull will submit an addendum to this report.

Additionally, the Erie County Health District was contacted to obtain information regarding spills or any other environmental problems involving toxic or hazardous substances associated with the Property.¹² Ms. Karen M. Gerold, Environmental Health Director of the Erie County Health District indicated that no information was found regarding the Property.¹³

⁸ Mr. Cleve Brown, ODNR, Division of Water, correspondence, November 13, 2002.

⁹ Mr. Cory Bonifas, ODNR, Division of Water, correspondence, November 15, 2002.

¹⁰ Ms. Diane Mulvin, Sandusky Fire Department, correspondence, November 13, 2002.

¹¹ Mr. Steven Wagner, State of Ohio Health Department, correspondence, November 13, 2002.

¹² Ms. Karen Gerold, Erie County Health District, correspondence, November 12, 2002.

¹³ Ms. Karen Gerold, Erie County Health District, correspondence, November 13, 2002.

3.3.3 Local Emergency Planning Committee

The Erie County Emergency Planning Committee was contacted to obtain information regarding air quality issues, spills or any other environmental problems involving toxic or hazardous substances associated with the Property.¹⁴ Ms. Cheetham of the Erie County Emergency Planning Committee sent several documents including a March 1, 2001 Emergency and Hazardous Chemical Inventory Form. The form lists the following chemicals were being stored, used, or generated at the Property: sodium hydroxide, hydrochloric acid, potassium chloride, nitric acid, and sulfuric acid.

3.4 Additional Records

3.4.1 Oil and Gas Well Log Information

The ODNR was contacted to obtain locations of oil and gas wells located within ½-mile of the Property.¹⁵ The ODNR oil/gas well map indicated that no oil and gas wells are located within ½-mile of the Property.¹⁶

3.4.2 Flood Insurance Rate Map

The flood insurance rate map (FIRM) for the Property (390153 0055 C) was obtained from the Flood Emergency Management Agency (FEMA). The map identifies areas that would be affected by a 100-year and 500-year flood. These floods are of such magnitude that the probability of such an event occurring is once every 100 or 500 years, respectively. The map indicates that the Property is located in Zone C, which is defined as an area outside the 500-year floodplain. A copy of the map is provided in Appendix G.

3.4.3 Federal Wetlands Map

A copy of the National Wetlands Inventory map for the Property (Sandusky, Ohio) was obtained from the Erie County Soil and Water Conservation District. The map identifies areas that are recognized by the State of Ohio as wetlands. Activities that are conducted in areas that are designated as wetlands may be restricted by the federal, state, or local agencies. A review of the map did not identify any wetlands on the Property. However, based on the Property reconnaissance, wetlands may exist on the Property (see Figure 2). A wetland evaluation will be required to determine the presence/absence of wetlands. A copy of this map is included in

¹⁴ Ms. Marianne Cheetham, Erie County Local Emergency Planning Committee, correspondence, November 13, 2002.

¹⁵ Ms. Madge Fitak, Ohio Department of Natural Resources – Division of Geological Survey, correspondence, November 13, 2002.

¹⁶ Ms. Madge Fitak, Ohio Department of Natural Resources – Division of Geological Survey,

3.4.4 Regional Geology and Hydrogeology

Based on the local topography, groundwater flow in the vicinity of the Property is likely toward the east/northeast. The elevation of the Property is approximately 600 feet USGS. The topography of the Property slopes to the east/northeast.

Bedrock underlying the Property consists of Delaware limestone.¹⁷ It is estimated that locally the elevation of the bedrock surface is at about 600 feet, or very close to the ground surface. Based on closure activities conducted at the former surface impoundment area, limestone bedrock was encountered at a depth of four feet below the surface. The surface of the bedrock slopes toward the east/northeast in the vicinity of the Property.¹⁸ Yields of more than 500 gallons per minute have been developed at less than 200 feet in cavernous limestone and dolomite in the vicinity of the Property.¹⁹

3.4.5 Orphan Facilities

The EDR report identified nine orphan facilities which were listed in one or more databases, but do not have enough address information to be located by EDR. However, based on our area reconnaissance, none of these orphan sites are likely to have affected the Property.

correspondence, December 5, 2002.

¹⁷ G. E. Larsen, 1999, Preliminary Bedrock Geology of the Sandusky, Ohio, Quadrangle.

¹⁸ G. Larsen, 1999, Bedrock Topography of the Sandusky, Ohio, Quadrangle.

¹⁹ Alfred C. Walker, 1986, Groundwater Resources of Erie County.

4.0 HAZARDOUS SUBSTANCE AND PETROLEUM RELEASE HISTORY

Based on a review of available files and a reconnaissance of the Property, the following releases have occurred at the Property:

1. Notes on an Inspection of Industrial Waste Treatment Facilities at Bechtel-McLaughlin, Incorporated in Erie County dated August 14, 1969 notes that all plating wastes were being discharged without treatment.
2. An Initial Pollution Report Form dated March 25, 1971 indicates that a "bad" spill occurred from Bechtel-McLaughlin. The form states that cyanide or chromium or both came through a tile out into a field.
3. An Ohio Department of Health Memorandum dated March 30, 1971 indicates that the owner of the property through which the discharge from Bechtel-McLaughlin was flowing notified the Northwest District Office of pollution coming from the company. When inspected, the receiving stream appeared light green and after the stream had entered Sandusky Bay a yellowish-green color was noted in a 200-foot radius from the stream discharge point. Inspection of the system by Bill Sheets, Plant Manager revealed a rupture in part of the chrome reduction system. Untreated hexavalent chromium waste was entering a floor drain that discharges to the stream.
4. Notes on a visit by Ohio EPA to Bechtel-McLaughlin in Sandusky dated June 21, 1971 notes the following issues at the Property:
 - Pools of what appears to be concentrated chrome solution were located at the back of the plant.
 - A large acid-alkali line at the plant was leaking.
 - The small acid-alkali line had developed a leak that was flowing in the trench to the emergency holding lagoon. It was noted that this water had deposited yellowish-green solids in the trench.
 - Liquid containing yellowish-green solids in suspension which by-passes the treatment system and gets into the storm sewer had been noted flowing over the ground at the back of the plant for a distance of about 40 feet and was reported to be acid-alkali waste.
 - The sludge lagoon had developed a break and the liquid was noted to be pooled over an area at the back of the plant.
5. Notes on a visit to Bechtel-McLaughlin in Sandusky dated August 27, 1971 notes the following issues at the Property:
 - A large acid-alkali line at the plant was installed backwards and this line along with the small acid-alkali line had sprung numerous leaks.

- Although trenches in the plant have been completed to allow the liquid wastes from the barrel area to be treated, these waters presently discharge behind the plant to the storm sewer due to grade problems.
 - The sludge lagoon was filled to the point of overflowing liquid onto the ground at the back of the plant.
6. Notes on a visit by Ohio EPA to Bechtel-McLaughlin in Sandusky dated September 10, 1971 notes the following issues at the Property:
 - During the inspection, water, which was flowing over the ground at the back of the plant, was 40% effluent that is sent through reclaim filters.
 - Contents of the sludge lagoon were observed over a large area at the back of the plant.
 7. A Permit Violations/Self-Monitoring Reports letter dated March 15, 1978 from the Ohio EPA to Mr. Ohlemocher of Bechtel-McLaughlin, Incorporated indicates the effluent violations for copper, free cyanide, pH, total flow, zinc, and chromium.
 8. A Department of Natural Resources – Division of Water Initial Pollution Report outlines a chromium and chromate spill that occurred on December 15, 1981 at Bechtel-McLaughlin, Incorporated. The letter adds that the water in Second Creek was green in color. An Ohio EPA District Office Investigation Report outlines the same spill and states that 20 gallons of chrome, cobalt, and nickel plating waste constituted a minor spill at the Property, that there was a very light green discoloration of the water in a nearby ditch, and that the spill affected a ¾ mile length of area at the Property. An Ohio EPA District Office Investigation Report on the same spill states that a 30,000-gallon spill of 0.2 ppm chromic acid solution occurred due to a tank leak and affected a ¾ mile area at the Property. A subsequent letter on the spill from Mr. F. H. Taylor, Hearing Officer of the United States Coast Guard to Mr. Higgins of the Ohio EPA – Northwest District Office states that the agency file reports 30,000 gallons of 5% solution was spilled but that the facility argued that there was a discrepancy in the amount of chromic acid spilled.
 9. A letter dated April 29, 1986 from the Ohio EPA to Mr. John K. Ohlemacher, Assistant Plant Manager at Bechtel-McLaughlin, Incorporated states that the January and February, 1986 monthly operating report for the facility was reviewed. The letter states that violations were found in total zinc, free cyanide, total chromium, and total zinc concentrations from the facility's outfall.
 10. A letter dated June 26, 1986 from Ms. Kathryn S. McKibben, Environmental Scientist at the Ohio EPA to Mr. John K. Ohlemacher, Assistant Plant Manager at Bechtel-McLaughlin, Incorporated states that the April, 1986 monthly operating report for the facility was reviewed. The letter states that violations were found in total chromium concentrations from the facility's outfall.
 11. A letter dated July 29, 1986 from Ms. Kathryn S. McKibben, Environmental Scientist at the Ohio EPA to Mr. John K. Ohlemacher, of Bechtel-McLaughlin, Incorporated states that the May, 1986 monthly operating report for the facility was reviewed. The letter states that a violation was found in total copper concentrations from the facility's outfall.

12. A letter dated November 21, 1986 from the Ohio EPA to Mr. John Ohlemacher of Bechtel-McLaughlin, Incorporated states that the September, 1986 monthly operating report for the facility was reviewed. The letter states that violations were found in total copper concentrations from the facility's outfall.
13. A Potential Hazardous Waste Site Preliminary Assessment dated June 10, 1988 states that Bechtel-McLaughlin, Incorporated is an active RCRA and NPDES facility in operation since 1945. The assessment explains that the contaminated sludges were disposed of in a surface impoundment at the Property for an unknown period of time. Effluent wastewater was being discharged into Second Creek with numerous violations having had occurred.
14. A 30-Day Report regarding a discharge to the Taylor Ditch that occurred on October 17, 1996 was submitted by Crittenden J. Ohlemacher, VP of Technical Operations to Mr. Mike Gerber of the Ohio EPA – Division of Emergency & Remedial Response on November 16, 1996. The report gives the chronology of events from October 17, 1996 to November 14, 1996. A sample was taken from Taylor Ditch on October 17, 1996, several feet downstream from the storm sewer outfall and was found to contain 7,900 ug/l of zinc. After several remediation steps were implemented, a sample was taken from Taylor Ditch on October 18, 1996, several feet downstream from the storm sewer outfall and was found to contain 100 ug/l of zinc.

5.0 PROPERTY RECONNAISSANCE

5.1 General

Hull representative Mr. Adam M. Altman performed a reconnaissance of the Property on December 3, 2002 to visually assess the Property. Mr. Chuck Ohlemacher was present during the Property reconnaissance of the Bechtel-McLaughlin facility. Reverend Wally Gilbert was present during the reconnaissance of the Sandusky Baptist Temple. Several inches of snow was on the ground at the time of Property reconnaissance and certain Property features such as monitoring well locations and staining were not able to be observed.

5.2 Property Reconnaissance

The Property is comprised of the Bechtel-McLaughlin facility, the Sandusky Baptist Temple, agricultural land and residential properties. The Bechtel-McLaughlin facility is an operating plating facility. The Sandusky Baptist Temple is an active church. Of the three residences, only one (3806 Milan Avenue) was accessed for reconnaissance.

5.2.1 Bechtel-McLaughlin Facility

The building construction consists of a house (office area) and several building additions. With the exception of the house, which includes a basement, the facility primarily consists of slab on grade construction. The interior air of the facility includes particulates from plating operations.

Plating Lines/ Phosphate Line

A phosphate line is located at the northwest corner of this facility. Two current zinc plating lines are located at the central and east section of the Bechtel-McLaughlin facility, respectively.

ASTs/Drums/Boilers

Two hydrochloric acid ASTs are located southeast of the central zinc plating line. A former exterior HCL AST area is located adjacent to the southeast exterior wall. A boiler room is located to the northwest of the central zinc plating line and includes one active and one inactive boiler. A drum storage area including several full, partially filled, and empty containers of chemicals associated with plating operations is located in-between the plating areas. Two empty zinc solution ASTs were identified in the drum chemical storage area. Several drums were also identified in the boiler room and water treatment area. The water treatment area includes several ASTs for treatment of effluent process wastes. A diagram of these ASTs is located on Figure 3.

Laboratory

A laboratory is located south of the office area. According to Mr. Ohlemacher, the lab is used to formulate chemicals for plating processes and waste treatment.

Water Treatment

The water treatment area includes interior and exterior treatment areas. The interior area includes several holding tanks used for pH treatment, iron treatment, settling tanks, sand filters, cyanide and chromium treatment tanks. Several of these tanks are not in use. Several leaks were observed from these tanks and the floor drain system was actively collecting liquid from overflows. The exterior portion of the treatment area consists of liquid-filled concrete holding areas.

Transformers

Two old out-of-service transformers and two current transformers are located on the north side of the facility. According to Mr. Chuck Ohlemacher, these transformers are owned by the facility. The older transformers were located on the roof of the building and were not accessible for inspection. The ground surface in the area of the active transformers was covered in snow and no evidence of staining could be observed. The presence or absence of PCB oils could not be determined.

5.2.2 Sandusky Baptist Temple

This facility is comprised of two office/classroom buildings and a main chapel. All of these buildings are of slab on grade construction.

5.2.3 Agricultural Land

The majority of the Property footprint is comprised of agricultural land. A wooded area divides the two larger tracts located behind the Bechtel-McLaughlin facility and the Sandusky Baptist Temple. A third tract is located on Strub Road.

5.2.4 Houses

Three residences are located on the Property at 3704, 3706B and 3806 Milan Road. During Property reconnaissance, Hull was able to access the 3806 Milan Road house. Hull was unable to access the other residences. No obvious environmental concerns were noted around the exterior of these residences.

5.2.5 Asbestos

Suspect asbestos-containing materials (ACMs) includes floor tiles, plaster, drywall joint compound, window glazing, church acoustical tile and any other material in Property buildings that are not wood, glass, metal or concrete. An asbestos survey would be necessary in order to adequately assess these materials as ACM.

6.0 FINDINGS AND CONCLUSIONS

Hull performed a Phase I Environmental Property Assessment of the Property consisting of the Bechtel-McLaughlin facility, the Sandusky Baptist Temple, farmland, and houses located at 3704, 3706B, and 3806 Milan Road (U.S. 250) in Sandusky, Ohio.

This Phase I Environmental Property Assessment was conducted in accordance with OAC 3745-300-06 to determine if a release of hazardous substances or petroleum has or may have occurred on, underlying, or is emanating from the Property. The assessment was based on information gained by Hull personnel from: a review of a previous environmental investigation performed at the Property, public documents, files, photographs, and maps; correspondence with regulatory agencies; a review of an environmental regulatory database search report; an informal interview with the Property owner; and a reconnaissance of the Property.

6.1 Voluntary Action Program Eligibility

Based upon Hull's review of documents and Property reconnaissance, a portion of the Property is eligible for Ohio's Voluntary Action Program (VAP) as codified at OAC 3745-300-02. There may be, however, a potential eligibility issue in the following area:

1. The Bechtel-McLaughlin facility was identified as a RCRA transportation, storage, or disposal (TSD) facility and a RCRA Large Quantity Generator (LQG). All units appear to have been closed in accordance with Ohio EPA requirements with the exception of the former surface impoundment area. This unit has most recently been denied an Equivalency Demonstration due to chemicals in the groundwater above MCLs at an up-gradient monitoring well. The U.S. EPA has recommended that a facility wide investigation be conducted in accordance with the Voluntary Action Program to confirm other source areas at the Property outside of the former Surface Impoundment. Until this issue is resolved, this portion of the Property may not be eligible for the VAP.

6.2 Identified Areas

Based upon Hull's review of documents and the Property reconnaissance, the following Identified Areas were determined:

Area A: Historical records and the reconnaissance indicate several releases of chemicals have occurred at the Betchel-McLaughlin facility. Specific areas associated with this facility are listed below as Areas A1 through A12.

- A1. Groundwater Contamination – An August 30, 2001 letter from Ohio EPA and an April 9, 2002 report by Pollution Prevention Associates indicates that zinc, cadmium, nickel, cis-1,2, dichloroethene, trans-1,2, dichloroethene, trichloroethene, vinyl chloride and tetrachloroethene were detected above MCLs at monitoring wells located at the Property.

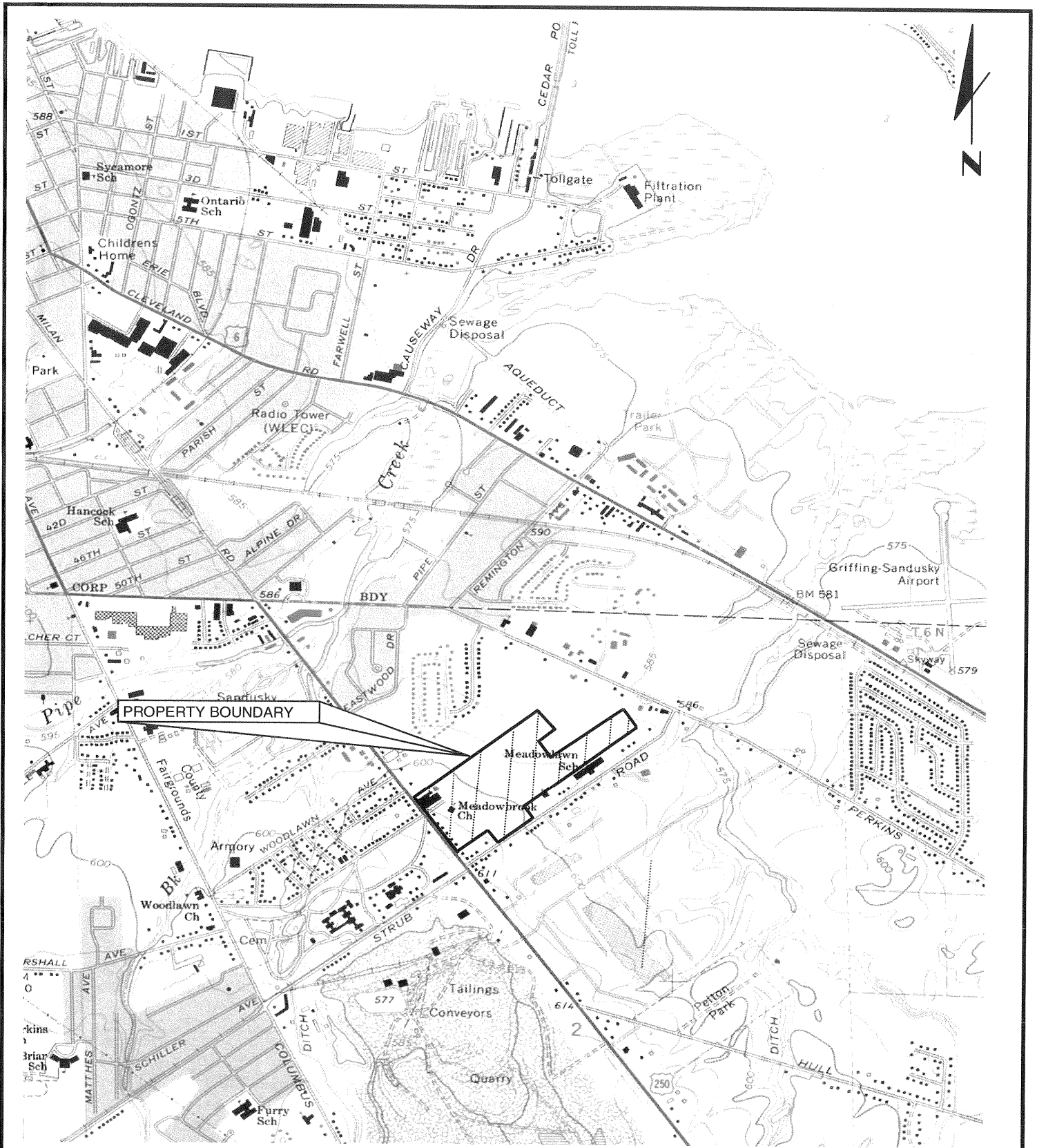
- A2. Former Surface Impoundment (1956 Aerial) - A surface impoundment/pit was located in an area that now straddles the east edge of the current facility structure.
 - A3. Former Surface Impoundment (1960 Aerial) - A small surface impoundment/pit was located approximately 50 to 100 feet northeast of the current facility structure.
 - A4. Former Surface Impoundment (1964 - 1977 Aerials) - A surface impoundment/pit was located in an area adjacent to the east corner of the current facility structure. This pit may be subject to further closure requirements as indicated in the eligibility section of this report (Section 6.1).
 - A5. Drainage Tile - Prior to installation of the water treatment plant in 1971, the facility discharged untreated plating wastes into a drainage tile that eventually led to an outfall to Second Creek located approximately 2,500 feet northeast of the current facility structure.
 - A6. Wooded Ditch Spills - Ohio EPA records indicate that this area was subject to a 30,000-gallon spill of chromic acid.
 - A7. Historical Plating Operations - Historical plating activities at the facility have included the use of cadmium, copper, nickel, zinc, tin, chromium, and chlorinated solvents.
 - A8. ASTs - Several ASTs were identified throughout the facility. Active ASTs include hydrochloric acid, sludge holding tanks, six tanks associated with chromium and cyanide treatment, filter tanks, and empty zinc solution tanks. Staining was observed at all of these locations.
 - A9. Current Plating Lines/ Phosphate Line - Two current zinc plating lines are located at the central and east section of the facility, respectively. A phosphate line is located at the northwest corner of the facility. Staining was observed at these locations.
 - A10. Drum Storage Area/ Miscellaneous Drums - A drum storage area is located immediately south of the central zinc plating line. This area is also the location of the former cyanide stripper solution tanks. Additionally, several labeled and un-labeled drums were identified throughout the facility during Property reconnaissance.
 - A11. Waste Treatment Areas - Historical and current liquid waste treatment in the waste treatment areas includes treating chromium, nickel, cyanide, copper, tin, zinc and phosphate wastes. The former sludge dumpster was also located in this area.
 - A12. Transformers - Two old out-of-service transformers and two current transformers are located on the north side of the facility. According to Mr. Chuck Ohlemacher, these transformers are owned by the facility.
- Area B: Potential Asbestos - Plaster, drywall, glazing, floor tile and insulation throughout all Property buildings may potentially contain asbestos. Acoustical tiles within the Sandusky Baptist Temple chapel may also contain asbestos.

6.3 Recommendations

In the event a No Further Action Letter is desired for this Property, or further data is desired to assess the identified areas, Phase II Property assessment activities are required. The requirements for a Phase II Property Assessment are codified in OAC 3745-300-07.

7.0 STANDARD CARE AND LIMITATIONS

The conclusions and recommendations presented herein are based on the level of effort and investigative techniques defined under the Scope of Work. Hull has conducted this investigation in a manner consistent with sound engineering practices and with professional judgement. No other warranty or guarantee, expressed or implied, is made. This report does not attempt to evaluate past or present compliance with federal, state and local environmental or land use laws and regulations, except to the extent the compliance relates to releases of hazardous substances or petroleum and to factors which may affect the eligibility of the Property under the Voluntary Action Program. Hull makes no guarantees regarding the completeness or accuracy of any information obtained in review of public or private files. Furthermore, this report is prepared for, and made available for the sole use of Mr. Jack Richeson or as otherwise provided in the Service Agreement between Hull and Mr. Jack Richeson; and, the contents thereof may not be used or relied upon by any other person without the express written consent and authorization of Mr. Jack Richeson and Hull.



QUADRANGLE LOCATION

SCALE 1" = 2000'
 SOURCE: USGS 7.5 MIN QUADRANGLE

SANDUSKY, OH 1969
 (PHOTOREVISED 1979)

FIGURE 1

HULL & ASSOCIATES, INC.
 SOLON, OHIO

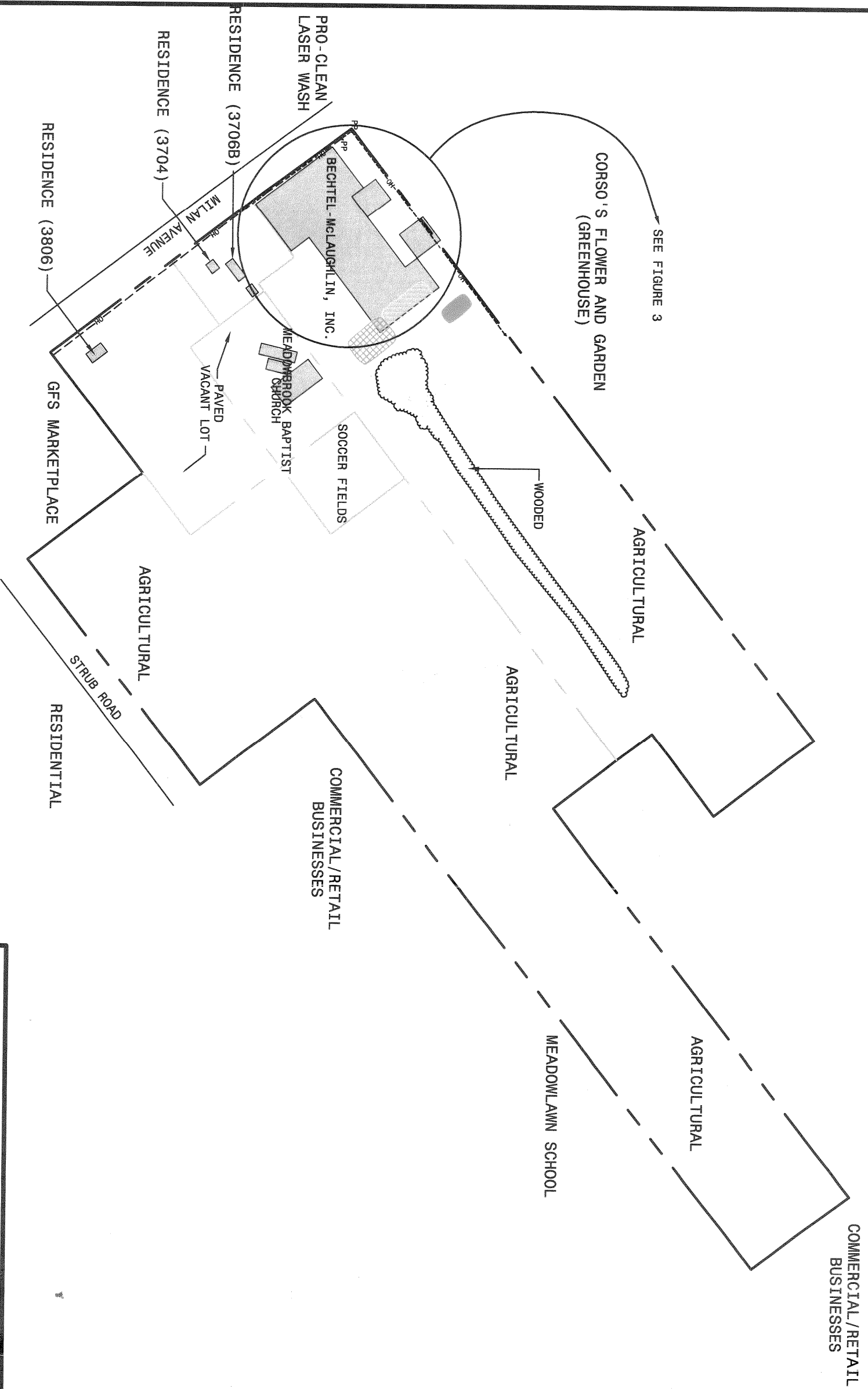
VAP ENVIRONMENTAL PROPERTY ASSESSMENT




PROPERTY LOCATION MAP

SANDUSKY, OHIO

DATE: DECEMBER 2002

HEM078



- PROPERTY LINE
- OH----- OVERHEAD ELECTRIC
-  SURFACE IMPOUNDMENT/PIT (1960 AERIAL)
-  SURFACE IMPOUNDMENT/PIT (1956 AERIAL)
-  SURFACE IMPOUNDMENT/PIT (1964-1977 AERIAL)

OHIO
VETERANS HOME

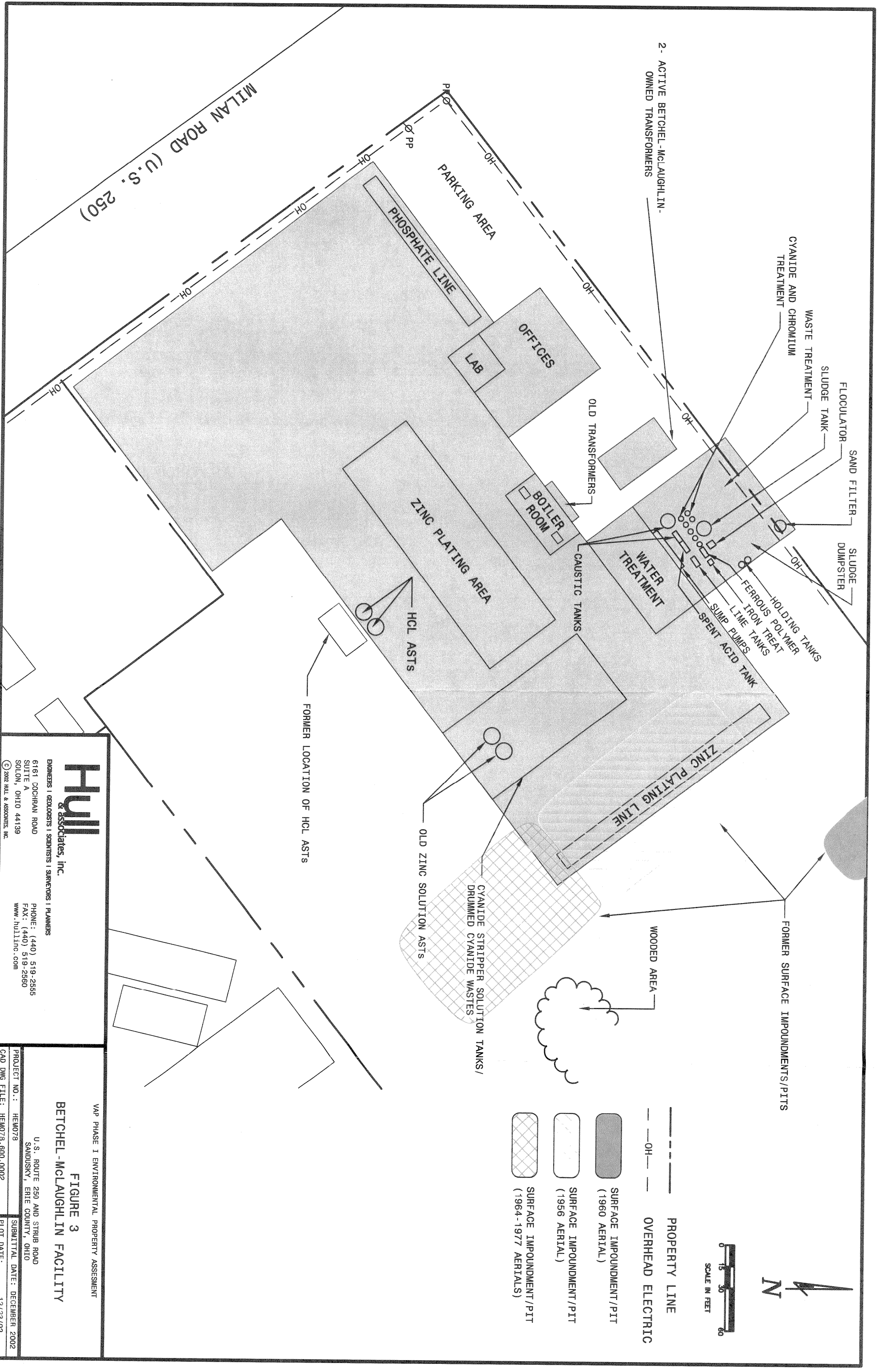


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VAP PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT

**FIGURE 2
PROPERTY PLAN**

U.S. ROUTE 250 AND STRUB ROAD
SANDUSKY, ERLE COUNTY, OHIO
PROJECT NO.: HEM078
SUBMITTAL DATE: DECEMBER 2002
CAD DWG FILE: HEM078.600.0001
PLOT DATE: 12/19/02



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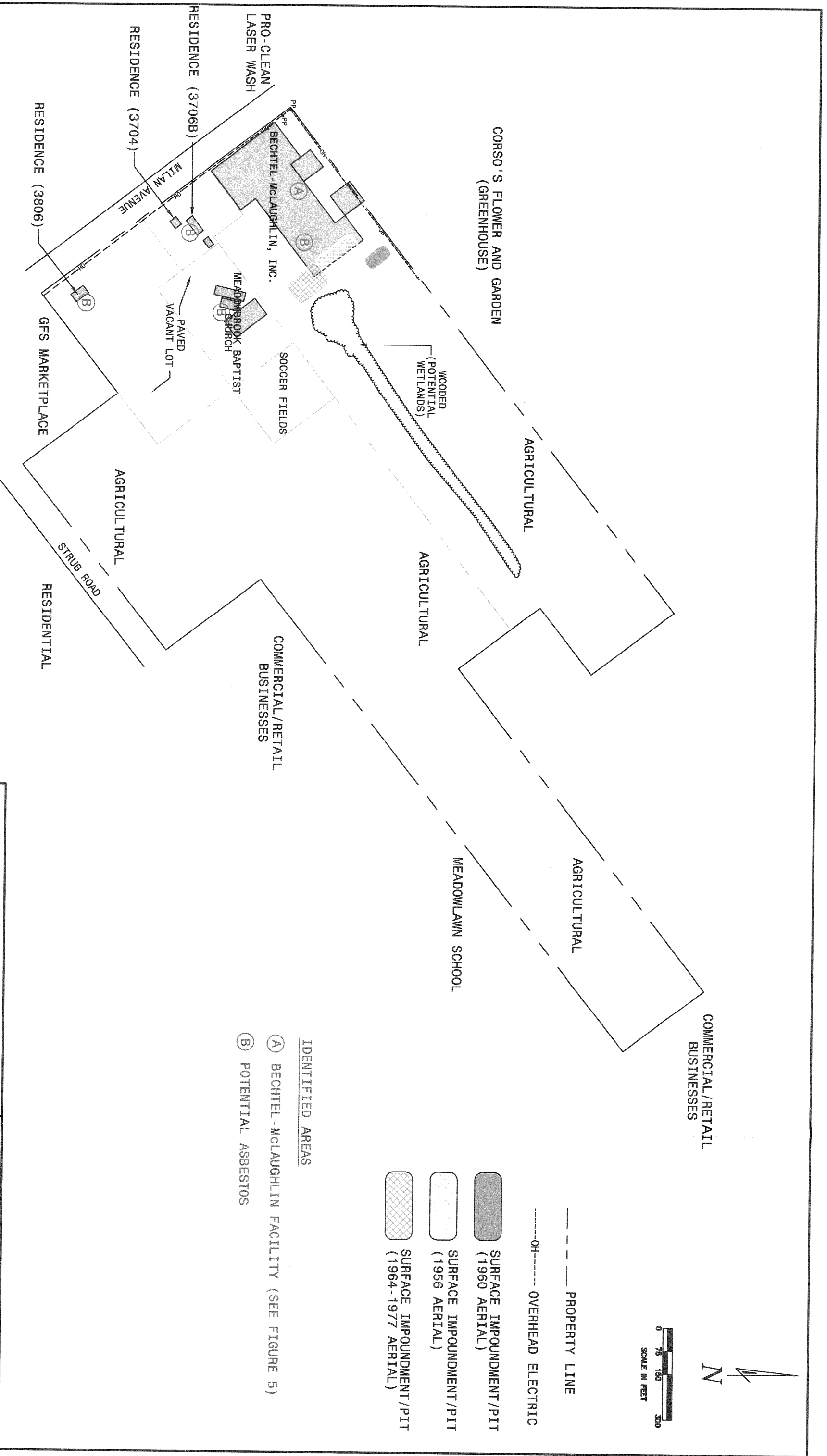
VAP PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT

FIGURE 3

BETCHEL-McLAUGHLIN FACILITY

U.S. ROUTE 250 AND STRUBB ROAD
 SANDUSKY, ERIE COUNTY, OHIO

PROJECT NO.: HEM078
 CAD DWG FILE: HEM078.600.0002
 SUBMITTAL DATE: DECEMBER 2002
 PLOT DATE: 12/23/02



- PROPERTY LINE
- OH----- OVERHEAD ELECTRIC
- SURFACE IMPOUNDMENT/PIT (1960 AERIAL)
- SURFACE IMPOUNDMENT/PIT (1956 AERIAL)
- SURFACE IMPOUNDMENT/PIT (1964-1977 AERIAL)

IDENTIFIED AREAS

- (A) BECHTEL-McLAUGHLIN FACILITY (SEE FIGURE 5)
- (B) POTENTIAL ASBESTOS

Hull
Associates, Inc.
ENGINEERS | GEOLOGISTS | SCIENTISTS | SURVEYORS | PLANNERS

6161 COCHRAN ROAD
SUITE A
SOLON, OHIO 44139

PHONE: (440) 519-2555
FAX: (440) 519-2560
WWW.HULLINC.COM

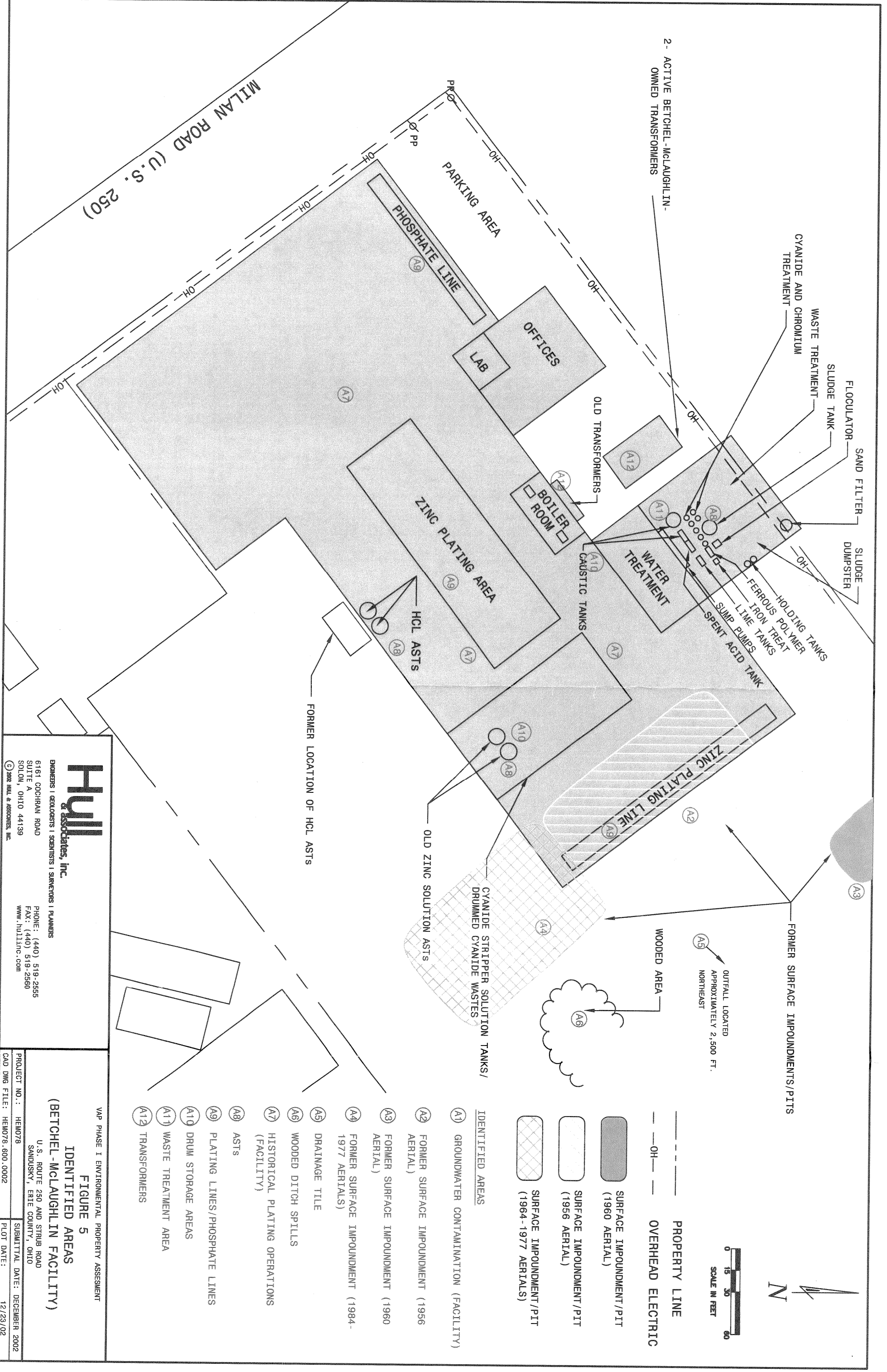
VAP PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT

FIGURE 4
IDENTIFIED AREAS

U.S. ROUTE 250 AND STRUB ROAD
SANDUSKY, ERIE COUNTY, OHIO

PROJECT NO.: HEM078
SUBMITTAL DATE: DECEMBER 2002
CAD DWG FILE: HEM078.600.0001
PLOT DATE: 12/19/02

OHIO
VETERANS HOME



2- ACTIVE BETCHEL-MCLAUGHLIN-OWNED TRANSFORMERS

MILAN ROAD (U.S. 250)

PARKING AREA

PHOSPHATE LINE

OFFICES

LAB

ZINC PLATING AREA

BOILER ROOM

HCL ASTS

WATER TREATMENT

CAUSTIC TANKS

HCL ASTS

OLD ZINC SOLUTION ASTS

ZINC PLATING LINE

CYANIDE STRIPPER SOLUTION TANKS/
DRUMMED CYANIDE WASTES

WOODED AREA

FORMER SURFACE IMPOUNDMENTS/PITS

SLUDGE DUMPSTER
SAND FILTER
FLOCCULATOR
SLUDGE TANK
WASTE TREATMENT
CYANIDE AND CHROMIUM TREATMENT

HOLDING TANKS
IRON TREAT
LIME TANKS
SUMP PUMPS
SPENT ACID TANK

OUTFALL LOCATED
APPROXIMATELY 2,500 FT.
NORTHEAST

- PROPERTY LINE**
- OVERHEAD ELECTRIC**
- IDENTIFIED AREAS**
- (A1) GROUNDWATER CONTAMINATION (FACILITY)
 - (A2) FORMER SURFACE IMPONDMENT (1960 AERIAL)
 - (A3) FORMER SURFACE IMPONDMENT (1960 AERIAL)
 - (A4) FORMER SURFACE IMPONDMENT (1984-1977 AERIALS)
 - (A5) DRAINAGE TILE
 - (A6) WOODED DITCH SPILLS
 - (A7) HISTORICAL PLATING OPERATIONS (FACILITY)
 - (A8) ASTS
 - (A9) PLATING LINES/PHOSPHATE LINES
 - (A10) DRUM STORAGE AREAS
 - (A11) WASTE TREATMENT AREA
 - (A12) TRANSFORMERS
- SURFACE IMPONDMENT/PIT**
(1960 AERIAL)
- SURFACE IMPONDMENT/PIT**
(1956 AERIAL)
- SURFACE IMPONDMENT/PIT**
(1964-1977 AERIALS)



Hull

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6161 COCHRAN ROAD
SUITE A
SOLOM, OHIO 44139
www.hullinc.com

PHONE: (440) 519-2555
FAX: (440) 519-2560

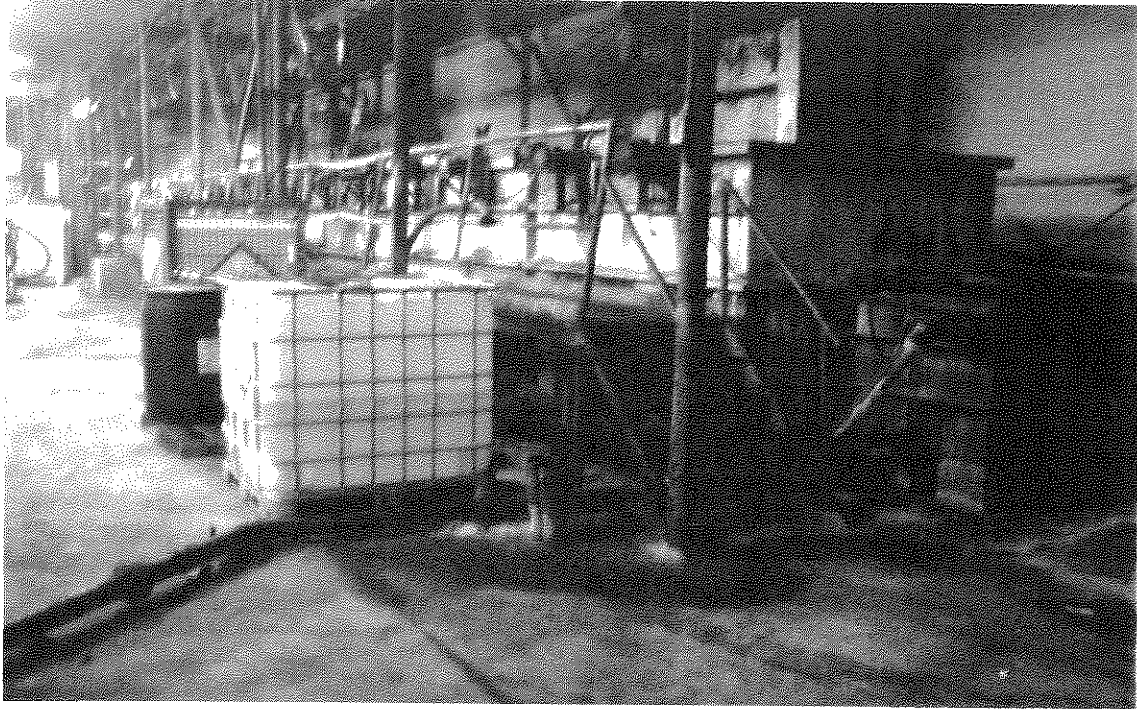
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SUBMITTAL DATE: DECEMBER 2002
CAD DWG FILE: HEM078.600.0002

PLOT DATE: 12/23/02

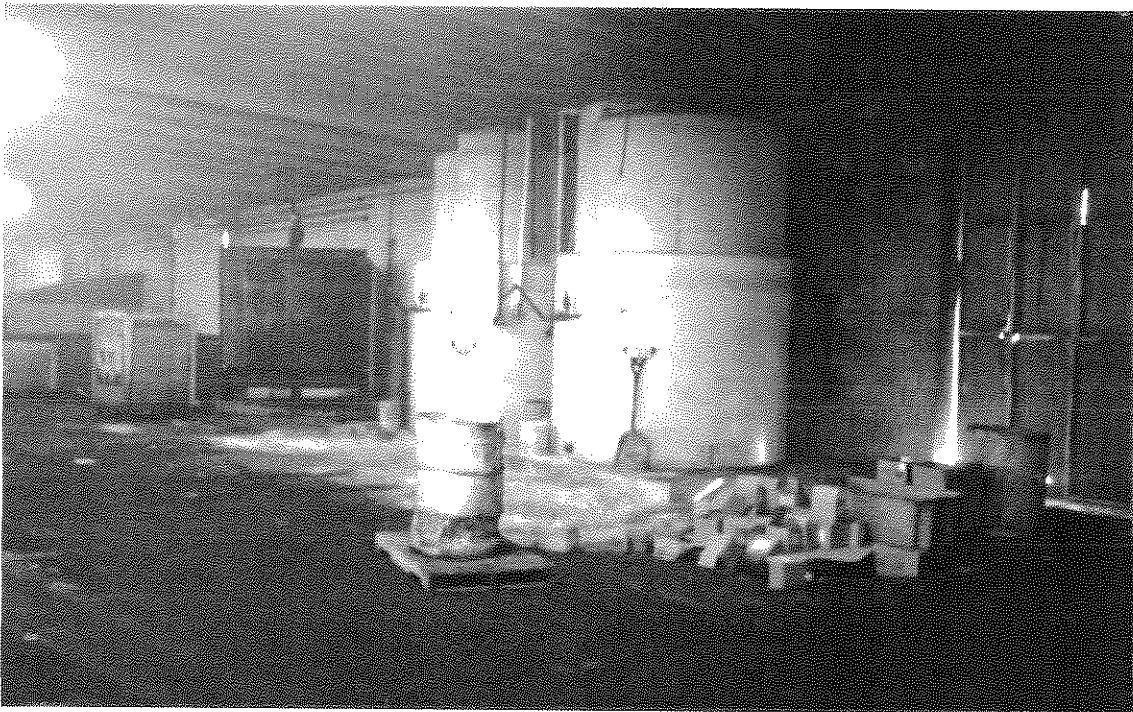
VAP PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT
FIGURE 5
IDENTIFIED AREAS
(BETCHEL-MCLAUGHLIN FACILITY)
U.S. ROUTE 250 AND STRUB ROAD
SANDUSKY, ERIE COUNTY, OHIO

APPENDIX A

Property Photographs



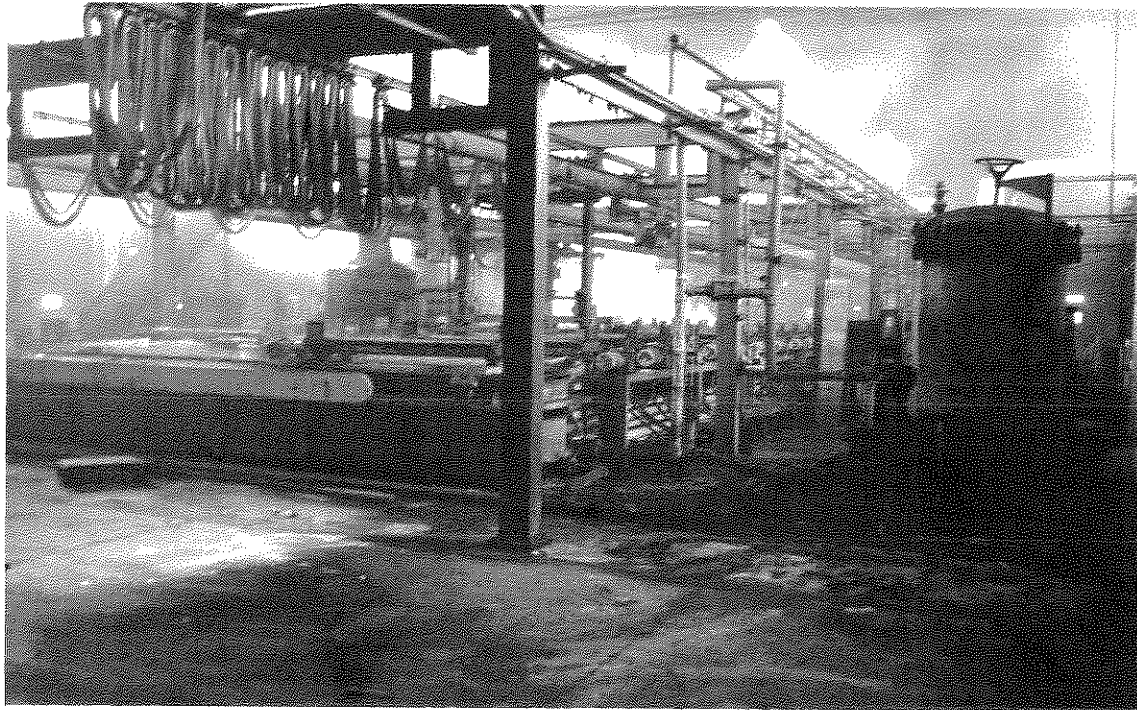
BECHTEL-MCLAUGHLIN: PHOSPHATE LINE



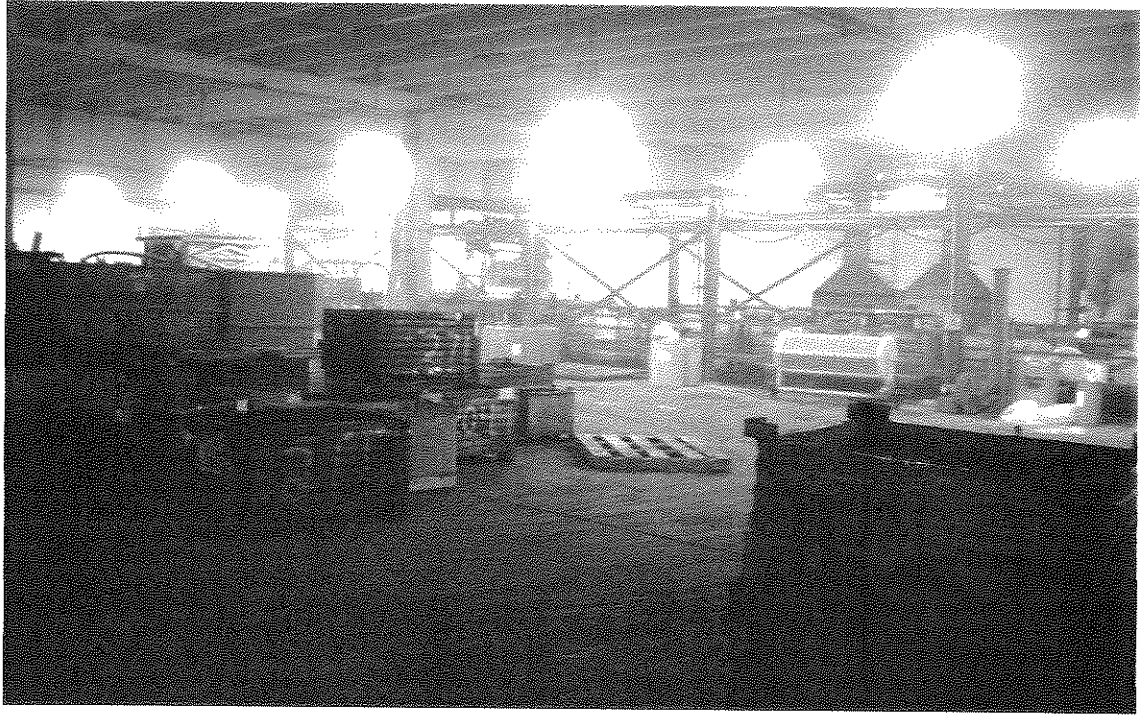
BECHTEL-MCLAUGHLIN: HCL STORAGE TANKS



BECHTEL-MCLAUGHLIN: CHEMICAL STORAGE AREA



BECHTEL-MCLAUGHLIN: ZINC PLATING AREAS



BECHTEL-MCLAUGHLIN: EAST ZINC PLATING LINE



BECHTEL-MCLAUGHLIN: WATER TREATMENT SUMPS

HULL & ASSOCIATES, INC.
SOLON, OHIO

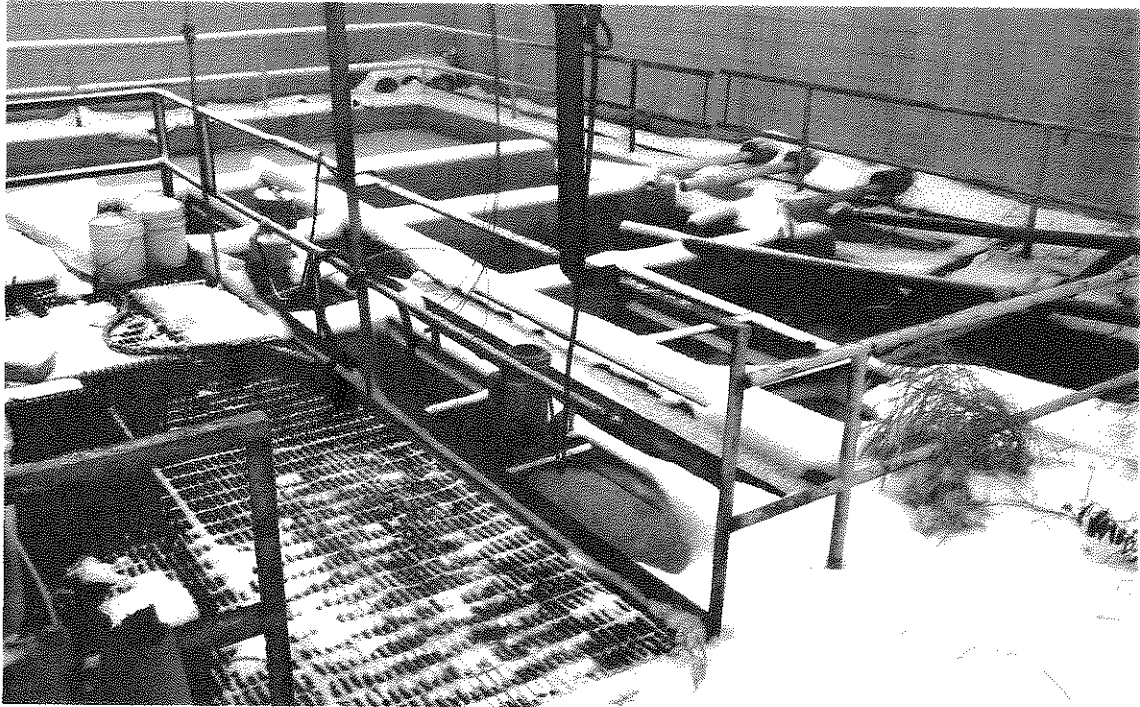
PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT
BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND

PHOTO PAGES

U.S. ROUTE 250 AND STRUB ROAD
SANDUSKY, ERIE COUNTY, OHIO

DATE: DECEMBER 2002

HEM078



BECHTEL-MCLAUGHLIN: EXTERIOR WATER TREATMENT SUMPS



BECHTEL-MCLAUGHLIN: PIPING TO WATER TREATMENT

HULL & ASSOCIATES, INC.
SOLO, OHIO

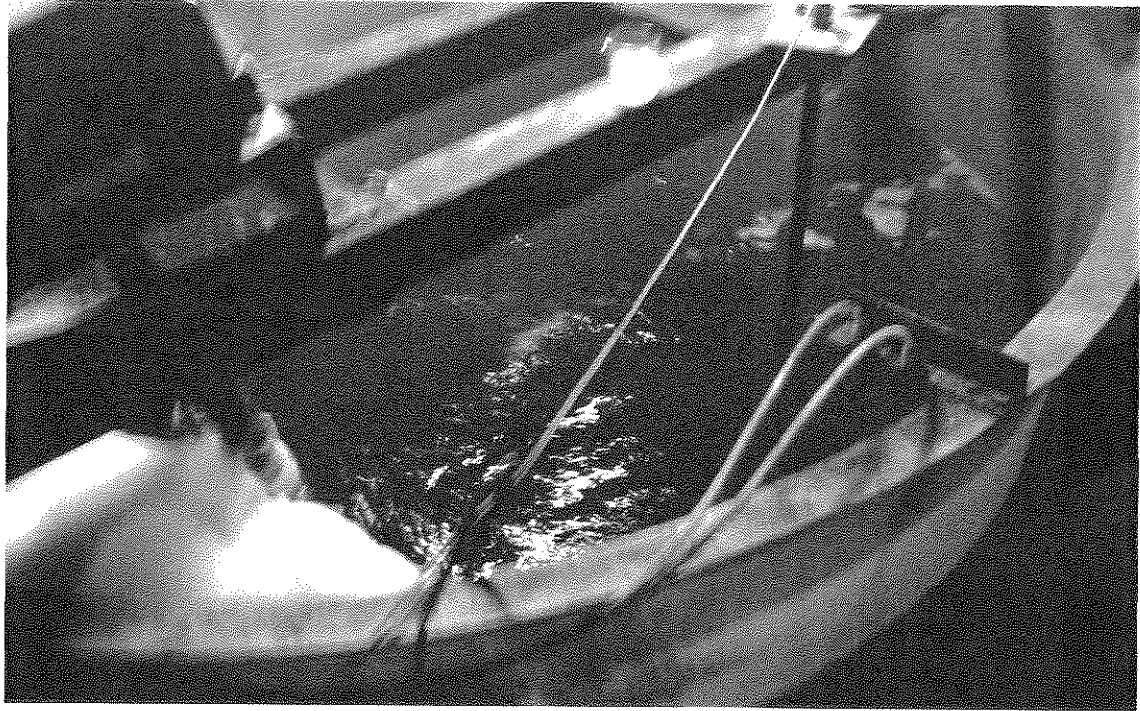
PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT
BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND

PHOTO PAGES

U.S. ROUTE 250 AND STRUB ROAD
SANDUSKY, ERIE COUNTY, OHIO

DATE: DECEMBER 2002

HEM078



BECHTEL-MCLAUGHLIN: FINAL WATER ROOM



BECHTEL-MCLAUGHLIN: TESTING, QA/QC LAB

HULL & ASSOCIATES, INC.
SOLON, OHIO

PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT
BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND

PHOTO PAGES

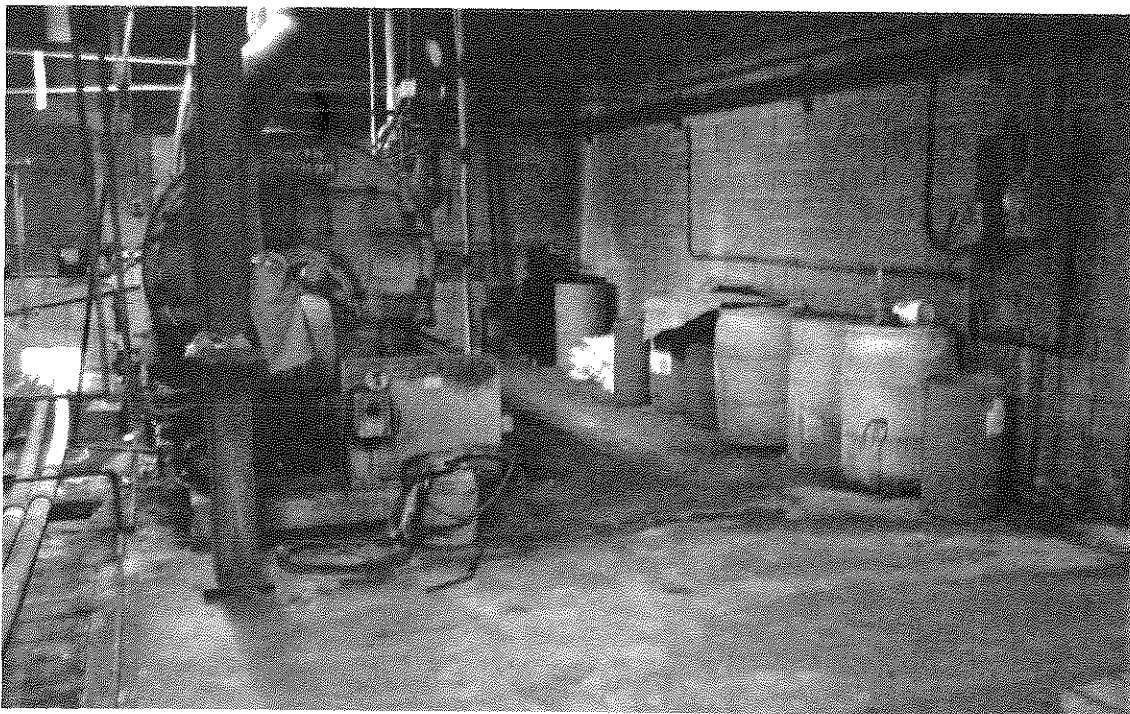
U.S. ROUTE 250 AND STRUB ROAD
SANDUSKY, ERIE COUNTY, OHIO

DATE: DECEMBER 2002

HEM078



BECHTEL-MCLAUGHLIN (BOILER ROOM): ACTIVE BOILER



BECHTEL-MCLAUGHLIN (BOILER ROOM): OLD BOILER + DRUMS



BECHTEL-MCLAUGHLIN: SOUTH SIDE OF FACILITY



BECHTEL-MCLAUGHLIN: FROM WEST SIDE OF US ROUTE 250

HULL & ASSOCIATES, INC. SOLON, OHIO
PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND
PHOTO PAGES
U.S. ROUTE 250 AND STRUB ROAD SANDUSKY, ERIE COUNTY, OHIO
DATE: DECEMBER 2002



BECHTEL-MCLAUGHLIN: NORTH PARKING AREA



BECHTEL-MCLAUGHLIN: SOUTH BAYS

HULL & ASSOCIATES, INC. SOLON, OHIO
PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND
PHOTO PAGES
U.S. ROUTE 250 AND STRUB ROAD SANDUSKY, ERIE COUNTY, OHIO
DATE: DECEMBER 2002



ADJACENT (WEST): PRO-CLEAN LASER WASH

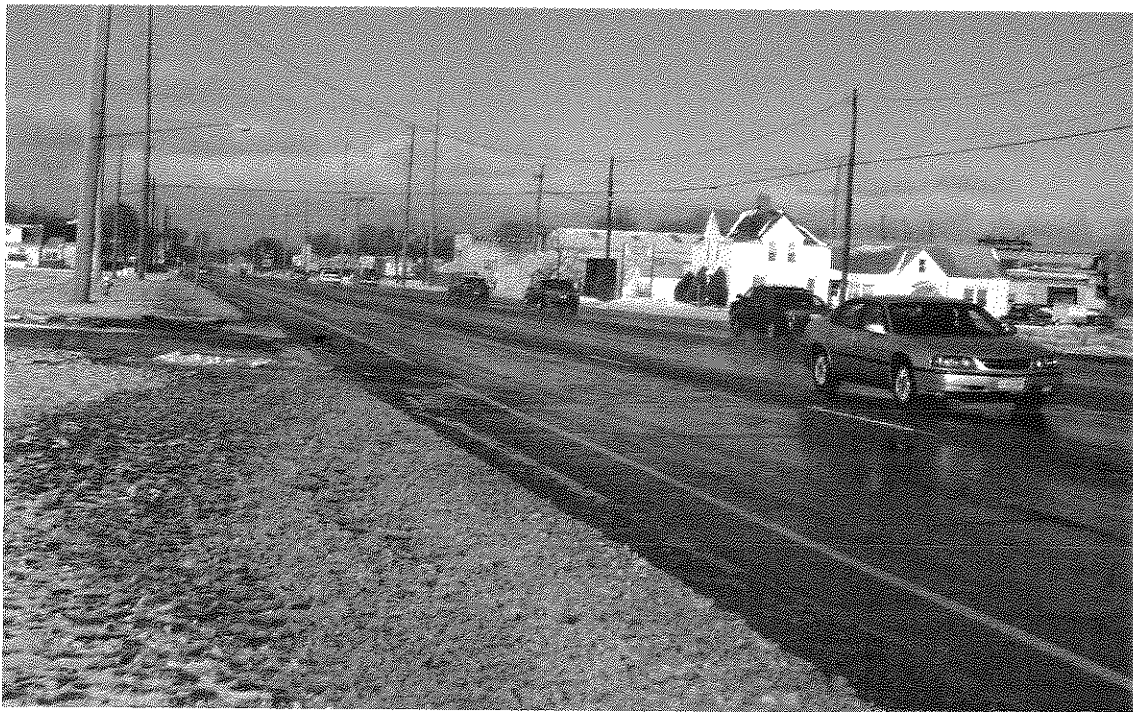


PROPERTY: FRONTAGE SOUTH OF SANDUSKY BAPTIST TEMPLE

HULL & ASSOCIATES, INC. SOLON, OHIO
PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND
PHOTO PAGES
U.S. ROUTE 250 AND STRUB ROAD SANDUSKY, ERIE COUNTY, OHIO
DATE: DECEMBER 2002



PROPERTY: 3806 MILAN ROAD



ADJACENT: U.S. ROUTE 250/MILAN ROAD



BECHTEL-MCLAUGHLIN: NORTH PARKING AREA



BECHTEL-MCLAUGHLIN: SOUTH BAYS



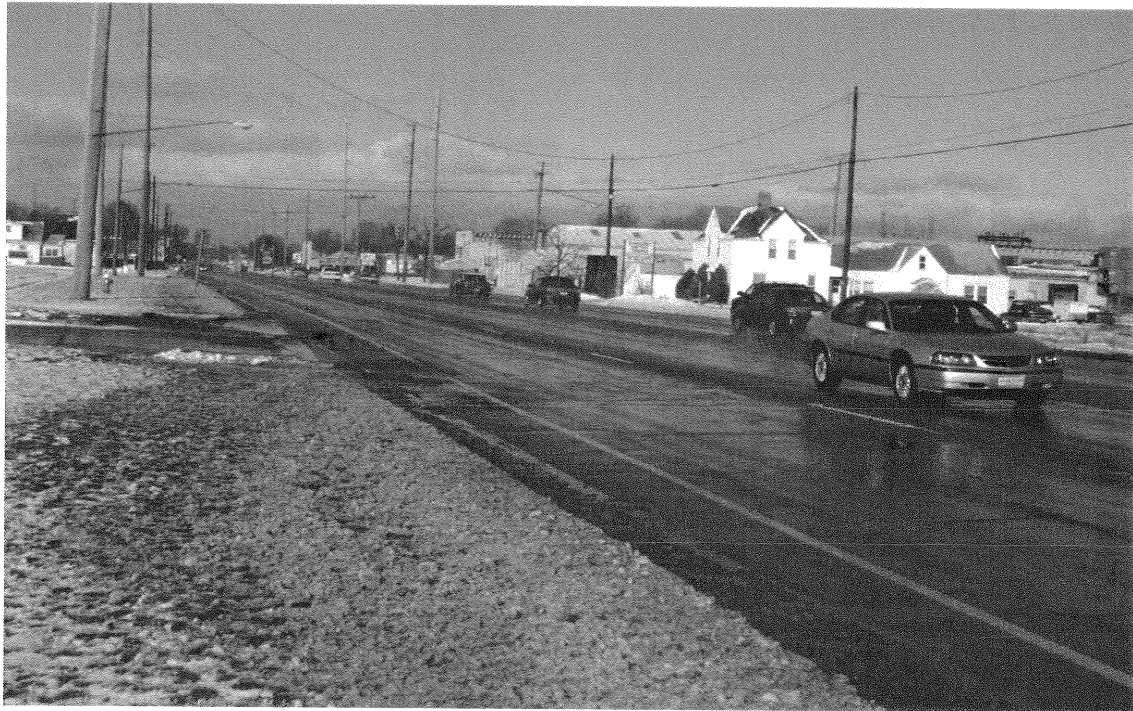
ADJACENT (WEST): PRO-CLEAN LASER WASH



PROPERTY: FRONTAGE SOUTH OF SANDUSKY BAPTIST TEMPLE



PROPERTY: 3806 MILAN ROAD



ADJACENT: U.S. ROUTE 250/MILAN ROAD

HULL & ASSOCIATES, INC.
SOLON, OHIO

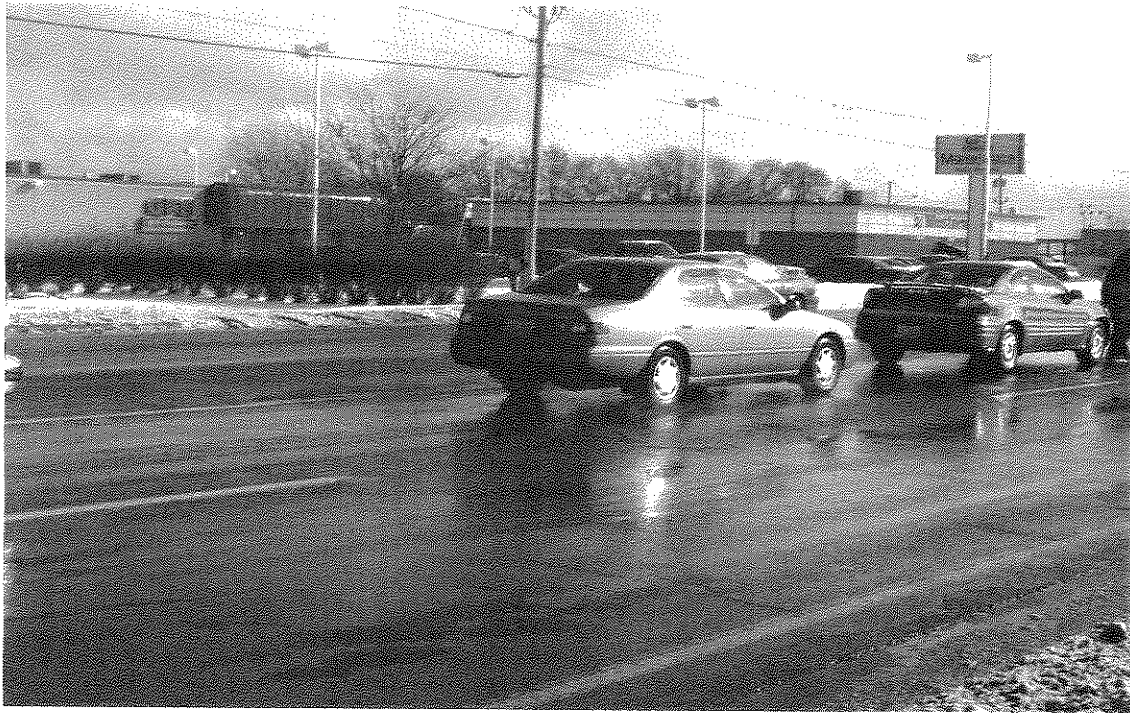
PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT
BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND

PHOTO PAGES

U.S. ROUTE 250 AND STRUB ROAD
SANDUSKY, ERIE COUNTY, OHIO

DATE: DECEMBER 2002

HEM078



ADJACENT (SOUTH): GFS MARKETPLACE

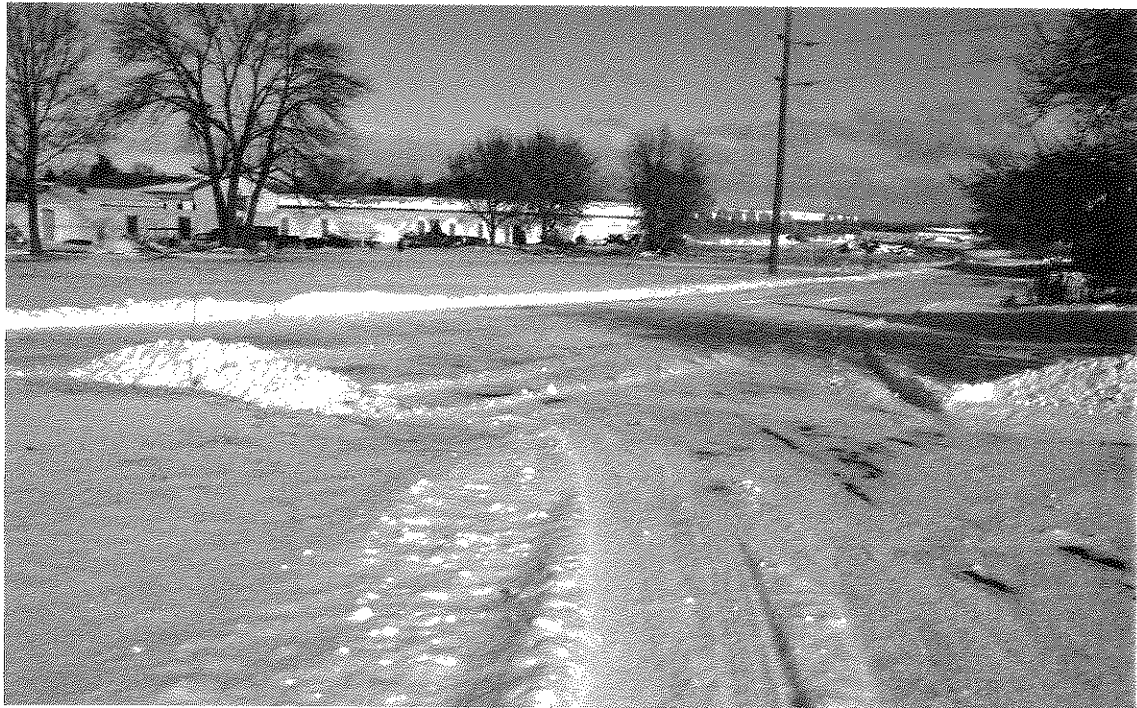


ADJACENT (NORTHWEST): RESIDENTIAL

HULL & ASSOCIATES, INC. SOLO, OHIO
PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND PHOTO PAGES U.S. ROUTE 250 AND STRUB ROAD SANDUSKY, ERIE COUNTY, OHIO
DATE: DECEMBER 2002
HEM078

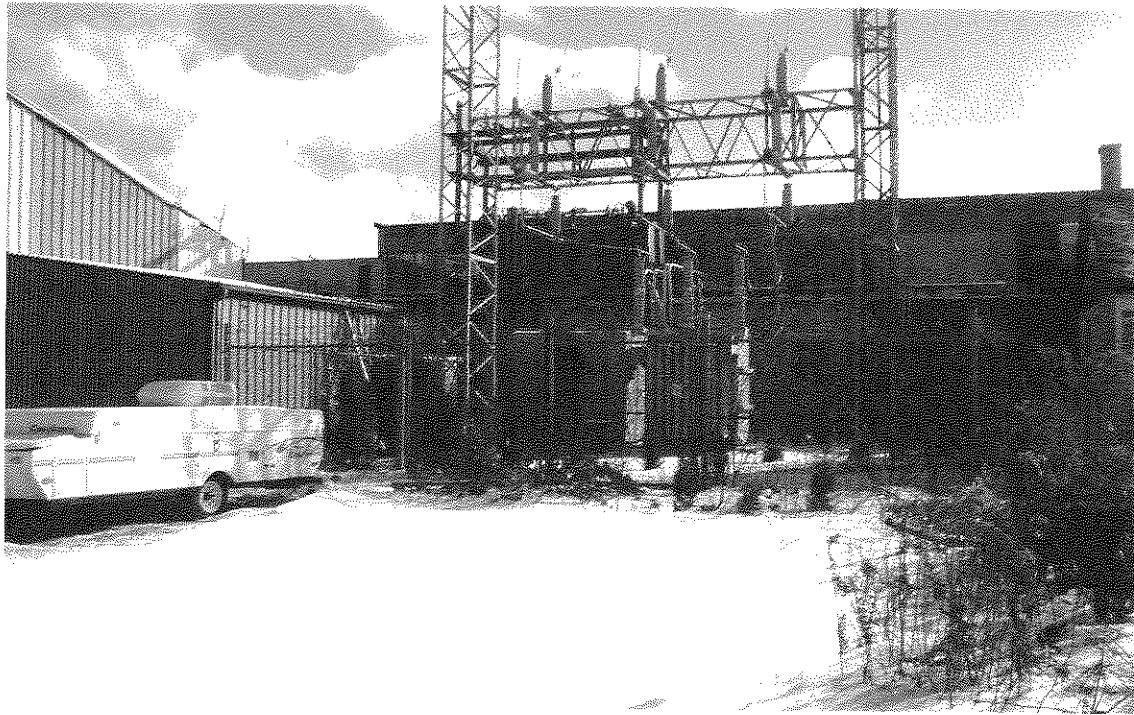


BECHTEL-MCLAUGHLIN: NORTH PARKING LOT

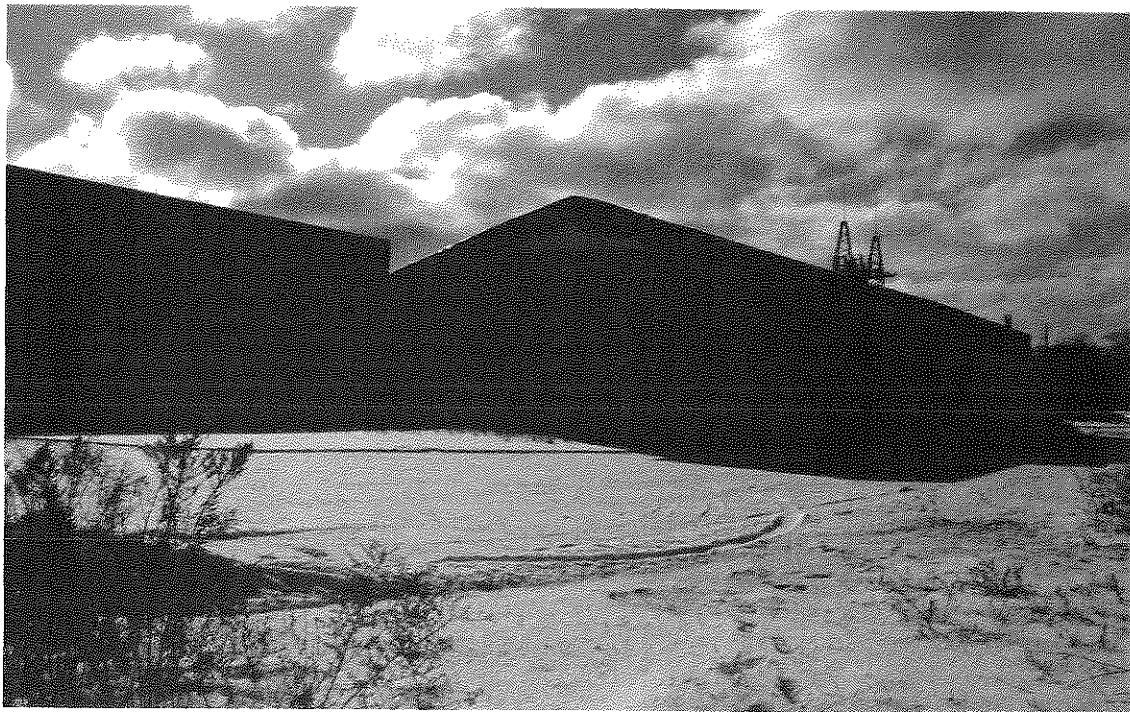


ADJACENT (NORTH): GREEN HOUSES

HULL & ASSOCIATES, INC. SOLOM, OHIO
PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND PHOTO PAGES U.S. ROUTE 250 AND STRUB ROAD SANDUSKY, ERIE COUNTY, OHIO
DATE: DECEMBER 2002
HEM078

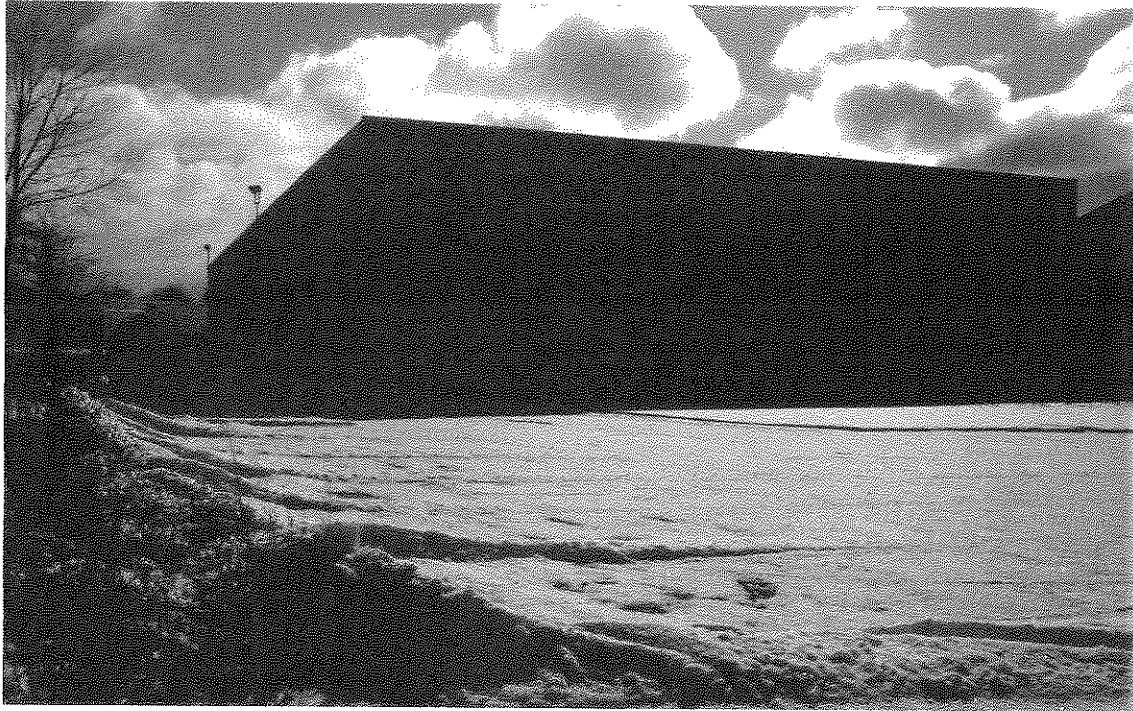


BECHTEL-MCLAUGHLIN: TRANSFORMERS



BECHTEL-MCLAUGHLIN: EAST EXTERIOR

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PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND PHOTO PAGES U.S. ROUTE 250 AND STRUB ROAD SANDUSKY, ERIE COUNTY, OHIO
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BECHTEL-MCLAUGHLIN: EAST EXTERIOR

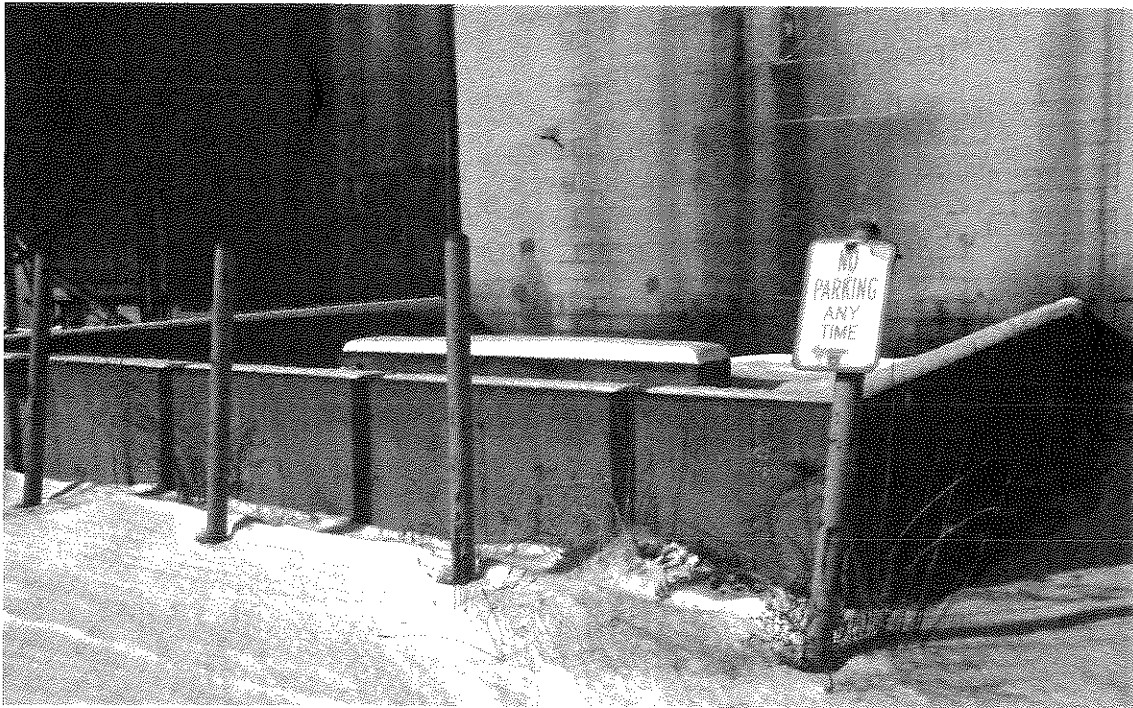


PROPERTY: AGRICULTURAL LAND TO EAST OF 3M

HULL & ASSOCIATES, INC. SOLO, OHIO
PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND PHOTO PAGES U.S. ROUTE 250 AND STRUB ROAD SANDUSKY, ERIE COUNTY, OHIO
DATE: DECEMBER 2002
HEM078



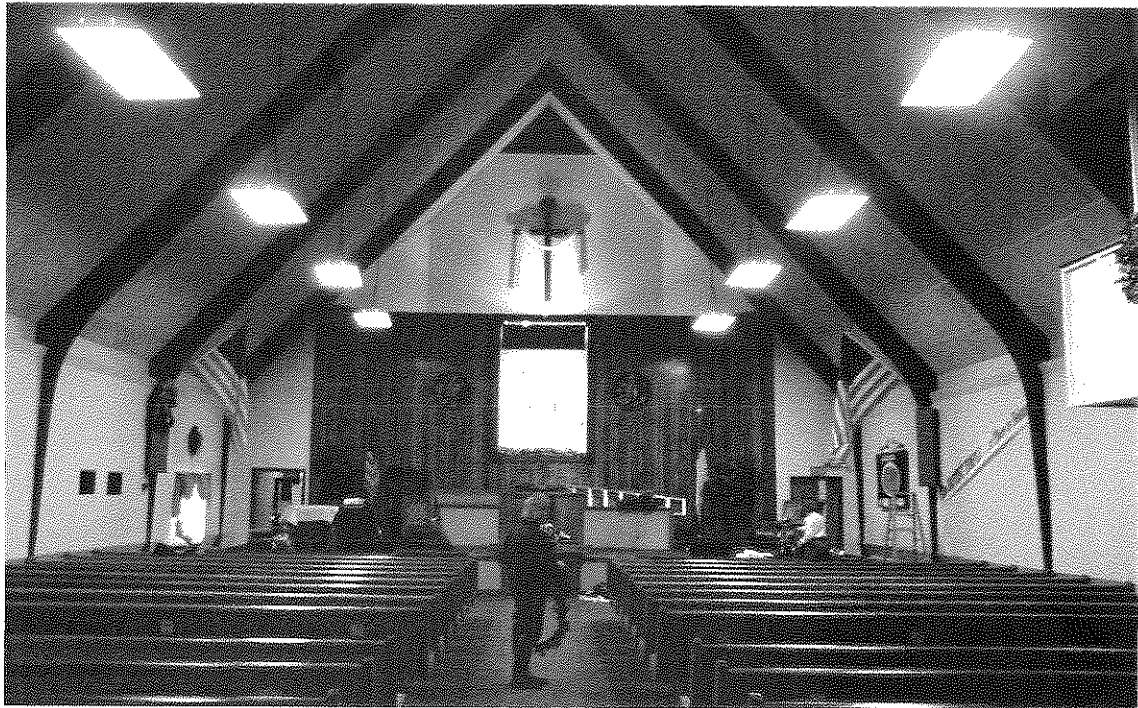
BECHTEL-MCLAUGHLIN: EAST EXTERIOR



BECHTEL-MCLAUGHLIN: FORMER LOCATION OF HCL ASTS



BECHTEL-MCLAUGHLIN: SOUTH EXTERIOR



SANDUSKY BAPTIST TEMPLE: MAIN CHAPEL

HULL & ASSOCIATES, INC.
SOLOM, OHIO

PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT
BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND

PHOTO PAGES

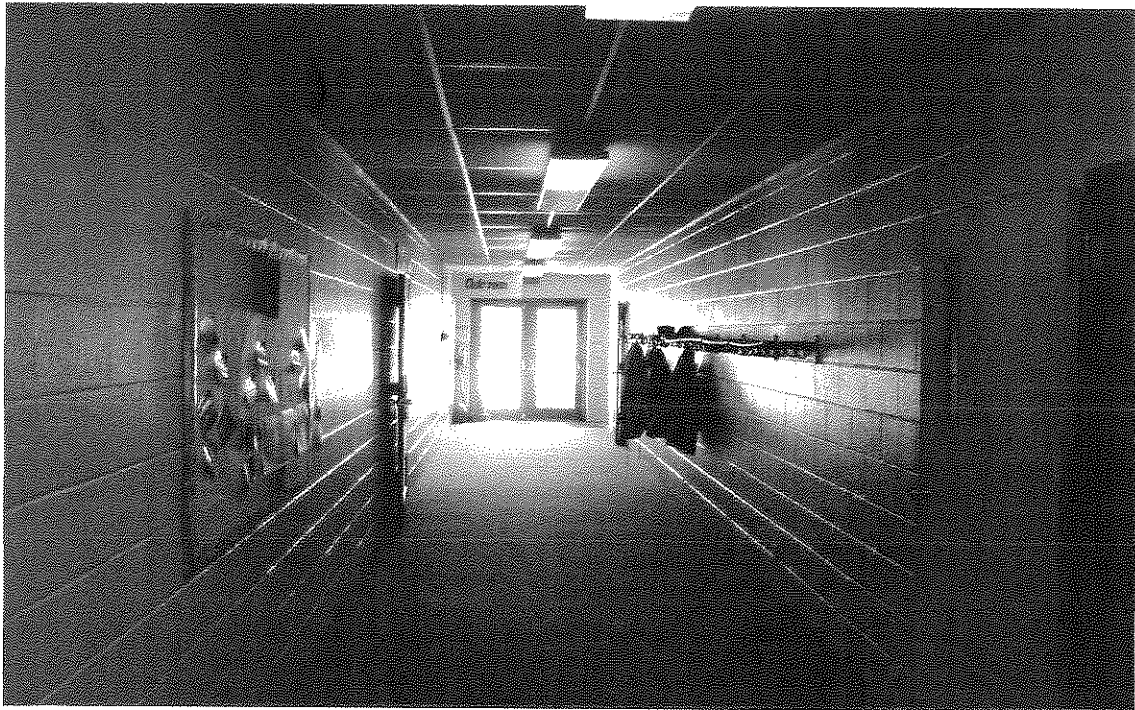
U.S. ROUTE 250 AND STRUB ROAD
SANDUSKY, ERIE COUNTY, OHIO

DATE: DECEMBER 2002

HEM078



SANDUSKY BAPTIST TEMPLE: NURSERY



SANDUSKY BAPTIST TEMPLE: HALLWAY

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PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND PHOTO PAGES U.S. ROUTE 250 AND STRUB ROAD SANDUSKY, ERIE COUNTY, OHIO
DATE: DECEMBER 2002
HEM078



PROPERTY: 3706 AND 3704 MILAN ROAD



SANDUSKY BAPTIST TEMPLE

HULL & ASSOCIATES, INC. SOLON, OHIO
PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND
PHOTO PAGES
U.S. ROUTE 250 AND STRUB ROAD SANDUSKY, ERIE COUNTY, OHIO
DATE: DECEMBER 2002



PROPERTY: AGRICULTURAL LAND SOUTHEAST OF SANDUSKY BAPTIST TEMPLE

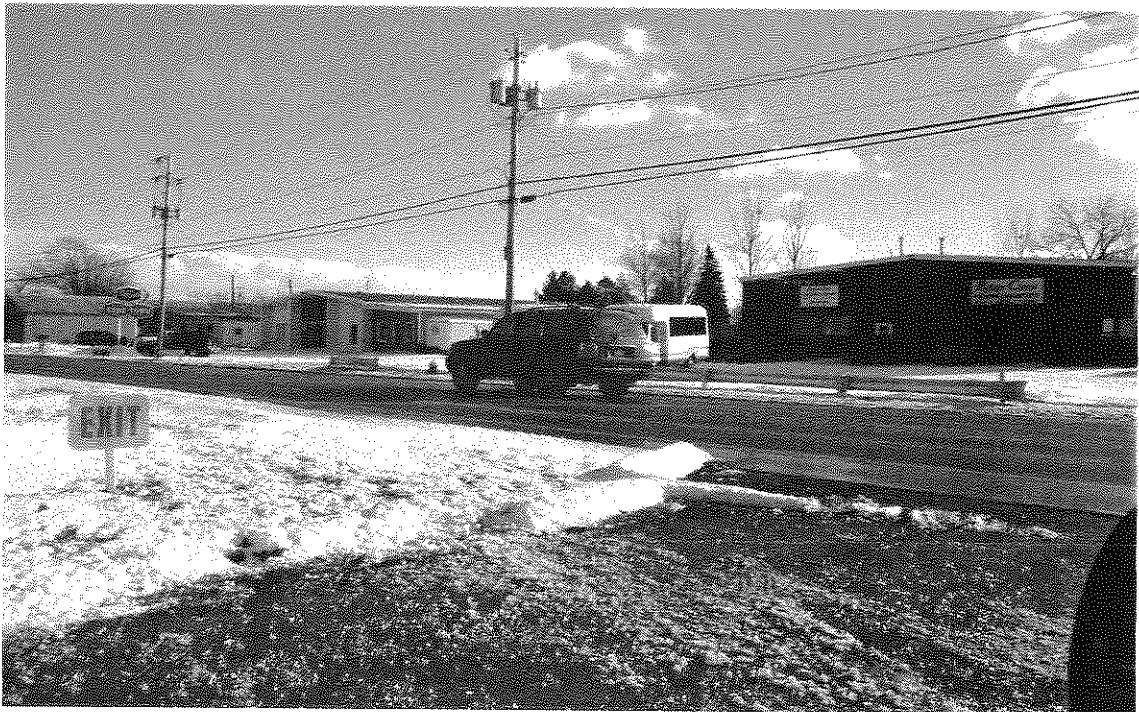


ADJACENT: COMMERCIAL PROPERTIES SOUTH OF PROPERTY

HULL & ASSOCIATES, INC. SOLO, OHIO
PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND PHOTO PAGES U.S. ROUTE 250 AND STRUB ROAD SANDUSKY, ERIE COUNTY, OHIO
DATE: DECEMBER 2002
HEM078



PROPERTY: AGRICULTURAL LAND WITH FRONTAGE ON STRUB ROAD



ADJACENT (SOUTH): RESIDENTIAL PROPERTY ACROSS STRUB ROAD

HULL & ASSOCIATES, INC.
SOLON, OHIO

PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT
BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND

PHOTO PAGES

U.S. ROUTE 250 AND STRUB ROAD
SANDUSKY, ERIE COUNTY, OHIO

DATE: DECEMBER 2002

HEM078



PROPERTY: AGRICULTURAL LAND EAST OF SANDUSKY BAPTIST TEMPLE



ADJACENT (SOUTH): MEADOWLAWN SCHOOL

HULL & ASSOCIATES, INC.
SOLON, OHIO

PHASE I ENVIRONMENTAL PROPERTY ASSESSMENT
BECHTEL-MCLAUGHLIN, CHURCH, HOUSES, AND FARMLAND

PHOTO PAGES

U.S. ROUTE 250 AND STRUB ROAD
SANDUSKY, ERIE COUNTY, OHIO

DATE: DECEMBER 2002

HEM078

APPENDIX B
Property Information

APPENDIX B-1

Legal Description and Current Property Deed

Know All Men By These Presents.

That, we, Orville H. Whitney and Helen E. Whitney, husband and wife,

for the consideration of One Dollar and other valuable considerations ^{the Grantors} (\$1.00 etc.) received to our full satisfaction of

Genevieve A. Miller
612 1/2 Van Buren Street, Sandusky, Ohio.

Give, Grant, Bargain, Sell and Convey ^{the Grantee, do} unto the said Grantee, her heirs and assigns, the following described premises, situated in the Township of Perkins, County of Erie and State of Ohio

That part of Lot Number Forty (40) in the Hallam Tract (so-called), in Section Number Two (2), in Perkins Township, Erie County, Ohio, bounded and described as follows: Beginning at a point in the easterly line of the Milan Road (so-called), north 37 degrees 29 minutes west a distance of 386.61 feet from the center line of the Strub Road (so-called), said point being in the north line of lands now or formerly owned by Rachel A. Skillman; thence north 52 degrees 04 minutes east, along said last mentioned line, a distance of 167.20 feet; thence north 37 degrees 29 minutes west a distance of 86.00 feet; thence south 52 degrees 04 minutes west a distance of 167.20 feet to the easterly line of the Milan Road; thence south 37 degrees 29 minutes east, along the east line of the Milan Road, a distance of 86.00 feet to the place of beginning; containing 0.33 acres, more or less, subject to legal highways.

be the same more or less, but subject to all legal highways.

To Have and to Hold the above granted and bargained premises, with the appurtenances thereof, unto the said Grantee, her heirs and assigns forever.

And we, Orville H. Whitney and Helen E. Whitney the said Grantors, do for ourselves and our heirs, executors and administrators, covenant with the said Grantee, her heirs and assigns, that at and until the encasing of these presents, we are well seized of the above described premises, as a good and indefeasible estate in FREE SIMPLE; and have good right to bargain and sell the same in manner and form as above written, and that the same are free from all incumbrances whatsoever except taxes and assessments for the year 1953 and thereafter which

the grantee assumes and agrees to pay.



and that we will warrant and defend said premises, with the appurtenances thereunto belonging, to the said Grantee, her heirs and assigns, against all lawful claims and demands whatsoever except as stated above.

not for voluntary annulment.

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not present and does not enter the said County right and expectancy of Dower in the above described premises.

24th day of March we have hereunto set our hands, the nine hundred and fifty three, in the year of our Lord one thousand

Signed and acknowledged in presence of

Clara Leser
William A. Leser
C. W. Whitney
John C. Whitney

State of Ohio, ss Before me a Notary Public
ERIE COUNTY, A. in and for said County and State, personally appeared
the above named Clara E. Whitney and John C. Whitney, husband
and wife,

who acknowledged that they did sign the foregoing instrument and that the same is their free act and deed.

In Testimony Whereof I have hereunto set my hand
and official seal at Sandusky, Ohio
this 24th day of March A. D. 1903.

Clara Leser

Notary Public. CLARA LESER

My Commission Expires October 31, 1909

128-173
Warrenton, Ind

1903 APR 21 AM 9:40
CARL A. SPEIR
RECORDER
ERIE COUNTY OHIO

1903 APR 21
ASO 1-1-1903
Carl A. Speir

STATE OF OHIO
COUNTY OF ERIE, SS
RECEIVED FOR RECORD ON THE
3rd, 11th and 19th 1903
at 9:40 o'clock A. M.
and RECORDED APR. 28th. 1903 in
Deed Book 240 PAGE 270-
.271

Carl A. Speir
RECORDERS FEE \$ 1.20
2.20 fee
6 2 6

Warranty Deed

To a Corporation

KNOW ALL MEN BY THESE PRESENTS: That Letta F. Clark, widow, Marjorie C. Hardy, widow, and Helen C. Whitney, widow,

of the County of Erie and State of Ohio, in consideration of the sum of Ten Dollars (\$10.00) and other good and valuable considerations

to them paid by Meadowbrook Baptist Church of Sandusky, Ohio a Corporation duly incorporated under the Laws of the State of Ohio of the City of Sandusky, County of Erie and State of Ohio, the receipt whereof is hereby acknowledged, do hereby GRANT, BARGAIN, SELL and CONVEY to the said Meadowbrook Baptist Church of Sandusky, Ohio

its successors and assigns forever, the following REAL ESTATE situated in the County of Erie in the State of Ohio and in the Township of Perkins and bounded and described as follows:

in the Hallam Tract (so-called) in being that part of Lot 40, Section 2, Perkins Township, Erie County, Ohio, as follows:

Beginning at a point in the southerly line of lands conveyed to Bechtel-McLaughlin Inc. by deed recorded in Volume 236, Page 320 of the Erie County Deed Records, North 52°24' East, 207.50 feet from the intersection of the said Bechtel-McLaughlin line, and said line produced southwesterly, with the centerline of the Sandusky-Norwalk Road, (Milan Road); thence South 37°29' East, parallel with the Sandusky-Norwalk Road, 250.00 feet to a point; thence North 52°24' East, 522.72 feet to a point; thence North 37°29' West, 250.00 feet to the Southerly line of said Bechtel-McLaughlin lands; thence South 52°24' West, along last mentioned line, and parallel with and 119 feet southerly measured at right angles, from the north line of said Lot 40, a distance of 522.72 feet to the place of beginning and containing 3 acres, more or less.

Together with a nonexclusive easement over the following described real estate (1) for ingress to and egress from the above described real estate; (2) for the installation and maintenance of a water line and (3) for the erection and maintenance of a church sign at the highway:

Beginning at a point in the centerline of the Sandusky-Norwalk Road (Milan Road), South 37°29' East, 219.00 feet from its intersection with the north line of Lot 40, Hallam Tract; thence North 52°24' East, 207.50 feet to a point; thence South 37°29' East, 50.00 feet to the centerline of the Sandusky-Norwalk Road; thence North 37°29' West, along said centerline, 50.00 feet to the place of beginning.

The above described real estate subject to said easement (1) may also be used by Grantees, their executors, administrators, heirs and assigns for, in inter alia, ingress to and egress from the real estate retained by Grantees adjacent to that conveyed in fee simple to the Grantees and (2) shall be improved and maintained in good condition as a driveway or street for vehicular traffic at the sole expense of the Grantees, their executors and

assigns, until and unless five (5) lots or five (5) acres of the aforesaid real estate retained by the Grantors is platted or sold for a development in which event the Grantee, its successors and assigns shall thereafter be obligated to bear one-half of the expense of maintaining said driveway as is, or as the same may be improved by the Grantors, their executors, administrators, heirs and assigns.

The Grantee covenants that in the event Grantors or their executors, administrators, heirs and assigns wish to construct an additional water line, in the real estate subject to said easement, to serve the aforesaid real estate retained by Grantors, the Grantee shall bear one-half of the expense of such water line from the highway to the Grantee's property line. Grantee shall thereupon be entitled to the nonexclusive use of said water line.



TO HAVE AND TO HOLD said premises, with all the privileges and appurtenances thereunto belonging, to the said Meadowbrook Baptist Church of Sandusky, Ohio

its successors and assigns forever.

And the said Lotta F. Clark, Marjorie C. Hardy and Helen C. Whitney

for themselves and their heirs, do hereby covenant with the said Meadowbrook Baptist Church of Sandusky, Ohio

its successors and assigns, that they are lawfully seized of the premises aforesaid; that the said premises are FREE AND CLEAR FROM ALL INCUMBRANCES WHATSOEVER;

and that they will forever WARRANT AND DEFEND the same with all
consequences unto the said Mendonck Baptist Church of Sandusky, Ohio

its successors and assigns, against the lawful claims of all persons whatsoever.

IN WITNESS WHEREOF, the said Lotta F. Clark, Marjorie C. Hardy and
Helen C. Whitney

whereby the said Lotta F. Clark, Marjorie C. Hardy and Helen C. Whitney, have

hereunto set their hands, this 30th day of June, 1962.

Signed and acknowledged
in presence of

[Signature]
[Signature]

Lotta F. Clark

Lotta F. Clark
Marjorie C. Hardy
Marjorie C. Hardy

Helen C. Whitney
Helen C. Whitney

THE STATE OF OHIO, _____ COUNTY, ss.

BE IT REMEMBERED, That on this 30 day of June, 1962,

before me, the subscriber, a notary public

in and for said County, personally came the above named Lotta F. Clark,
Marjorie C. Hardy and Helen C. Whitney

the Granters in the foregoing Deed, and acknowledged the signing of the same
to be their voluntary act and deed, for the uses and purposes therein
mentioned.

IN TESTIMONY WHEREOF, I have hereunto subscribed
name and affixed my official seal,
and year last aforesaid,

[Signature]
Notary Public

THIS INSTRUMENT WAS PREPARED BY M. J. Staffer of Sandusky, Ohio

GRANTOR'S COVENANT

For valuable consideration, receipt whereof is hereby acknowledged the Members of Baptist Church of Sandusky, Ohio hereby accept title to the above described real estate and the covenants hereinafter described, and agree to hold the obligations obligatory upon the Grantor and the covenants hereon contained, for a term of ten years, the expiration of which shall be on the 1st day of January, 1972, and to hold the obligations hereon contained, for a term of ten years, the expiration of which shall be on the 1st day of January, 1972.

Witnesses:

MEMBER OF BAPTIST CHURCH OF SANDUSKY, OHIO

Ruth Ann Butler

Wm. J. Butler

Richard H. Giffel

Date: July 13, 1962

WM. H. LEAFGREEN
Perkins Twp. Zoning
INSPECTOR

W.H.L.
Lot size APPROVED
7/10/62

1962	July 13, 1962	Perkins Twp. Zoning	Inspector	W.H.L.	Lot size APPROVED	7/10/62
1962	July 13, 1962	Perkins Twp. Zoning	Inspector	W.H.L.	Lot size APPROVED	7/10/62
1962	July 13, 1962	Perkins Twp. Zoning	Inspector	W.H.L.	Lot size APPROVED	7/10/62
1962	July 13, 1962	Perkins Twp. Zoning	Inspector	W.H.L.	Lot size APPROVED	7/10/62
1962	July 13, 1962	Perkins Twp. Zoning	Inspector	W.H.L.	Lot size APPROVED	7/10/62
1962	July 13, 1962	Perkins Twp. Zoning	Inspector	W.H.L.	Lot size APPROVED	7/10/62
1962	July 13, 1962	Perkins Twp. Zoning	Inspector	W.H.L.	Lot size APPROVED	7/10/62
1962	July 13, 1962	Perkins Twp. Zoning	Inspector	W.H.L.	Lot size APPROVED	7/10/62
1962	July 13, 1962	Perkins Twp. Zoning	Inspector	W.H.L.	Lot size APPROVED	7/10/62
1962	July 13, 1962	Perkins Twp. Zoning	Inspector	W.H.L.	Lot size APPROVED	7/10/62

APPROVED BY STATE OF OHIO COUNTY COMMISSIONER "NO FURTHER ACTION"

Know all Men by these Presents:That Bechtel-McLaughlin, Inc.

a Corporation incorporated under the laws of the State of Ohio the Grantor,
 who claim title by or through instrument recorded in Volume _____, Page _____, County
 Recorder's Office, for the consideration of Ten and 00/100 Dollars
 (\$ 10.00) received to its full satisfaction of B & F Properties, an Ohio partnership
 the Grantee,
 whose TAX MAILING ADDRESS will be 3612 Milan Road, Sandusky, Ohio 44870

do give, grant, bargain, sell and convey unto the said Grantee, its ^{SUCCESSORS} heirs and assigns, the fol-
 lowing described premises situated in Township of Perkins
 County of Erie and State of Ohio:

Parcel No. 1

In the second section of said township; one and 29/100 (1-29/100) acres of land in the northeast corner of lot number forty (40) and one and 22/100 (1-22/100) acres of land in the south part of subdivision number two (2) south of road, of lot number forty-six (46); both lots being in the Hallam Tract, so-called, more particularly described as follows: Being at the northeast corner of the said lot number forty (40), thence north 38-3/4° west two and 87/100 chains to the center of the road, thence in the center of the road south 66-3/4° east seven and 21/100 chains, thence south 37° west six and 33/100 chains, thence north 38-3/4° west five and 3/100 chains, thence north fifty and 3/4° east two and 75/100 chains to the point of beginning, containing two and 51/100 (2.51) acres of land. Excepting from said 1.22 acre parcel of land, a parcel conveyed to Theodore J. Sartor and Helen M. Sartor by instrument recorded in Volume 289 of Deeds, page 528 and described as follows: Being that part of Sublot 2, Lot 46 Hallam Tract, Section 2, Perkins Township, Erie County, Ohio, as follows: Beginning at the intersection of the centerline of Perkins Avenue with the westerly line of a 8.78 acre parcel now or formerly owned by D. Toll, et al.; thence South 37° 45' west, along last mentioned line, 175.82 feet to a point; thence North 66° 45' West, 86.00 feet to a point; thence North 37° 45' East, 175.82 feet to the centerline of Perkins Avenue; thence South 66° 45' East, along the centerline of Perkins Avenue, 86.00 feet to the place of beginning and containing .336 acres, more or less, but subject however to all legal highways. Also excepting therefrom that part thereof conveyed by Catherine Yepson to Theodore J. Sartor and Helen M. Sartor by deed dated July 29, 1966 and recorded in Volume 368 of Deeds, page 97, Erie County, Ohio Records.

Parcel No. 2

Being in the second section of said township, five (5) acres of land off of the east of the north part of Lot Number forty (40) of the Carman Survey of the Hallam Tract, said premises being taken off of the east end of the premises deed to Wm. H. De Witt by Jacob Hickman, et al., February 3, 1959.

Parcel No. 3

Being five (5) acres of land more or less, taken from the easterly part of the grantor's land in lot No. 40 of the Hallam Tract more definitely described as follows: Beginning at a point in the North line of Lot No. 40, which point is the northwest corner of the grantee's lands, and which same point is 660 feet westerly from an iron pin in the north line of Lot No. 40, said iron pin marking the northwest corner of a 1.29 acre parcel in Lot 40, thence westerly in the north line of Lot 40, 660 feet to a stake, thence southerly and parallel with the westerly line of the grantee's lands 334.50 feet to a stake in the southerly line of the grantor's lands, thence easterly in the southerly boundary line of the grantor's lands to the southwest corner of the grantee's lands, thence northerly 333.25 feet to the place of beginning, containing 5 acres of land, more or less.

I, JOHN C. COMBER, RECORDER, HEREBY CERTIFY THAT
 THE PART OF THIS INSTRUMENT OF B. J. Pappas
 WAS FILED IN THIS OFFICE ON 12-28-64
 AND IS # 244922 Vol 513 Page 187
 JOHN C. COMBER
 RECORDER

be the same more or less, but subject to all legal highways. To have and to hold the above granted and bargained premises, with the appurtenances thereunto belonging, unto the said grantee, its successors and assigns forever. And the said grantor does for itself and its successors and assigns covenant with said grantee, its successors and assigns, that at and until the ensueing of these presents it is well seized of the above described premises as a good and indefeasible estate, in fee simple, and has good right to bargain and sell the same in manner and form as above written; that the same are free and clear from all incumbrances whatsoever excepting easements, restrictions and conditions of record and real estate taxes and assessments

and that it will warrant and defend said premises, with the appurtenances thereunto belonging, to the said grantee, its successors and assigns, forever, against all lawful claims and demands whatsoever.

In witness whereof said corporation sets its hand and corporate seal, by Ronald Bechtel, its President and [Signature], Vice President this 30 day of November A. D. 19 84

BECHTEL-McLAUGHLIN, INC.

Signed and acknowledged in the presence of

[Signature] Ronald Bechtel President

[Signature] [Signature]

THE STATE OF Florida 0120 ss.
Palm Beach County

Before me, a Notary Public in and for said County, personally appeared the above named Bechtel-McLaughlin, Inc., an Ohio corporation

by Ronald Bechtel, its President

who acknowledged that they did sign the foregoing instrument and that the same is the free act and deed of said corporation and the free act and deed of each of them personally and as such officers.

In testimony whereof I have hereunto set my hand and official seal, at Palm Beach, Florida this 30th day of November, 1984

Mildred G. Chernatty
Commission Expires: _____

This instrument prepared by:

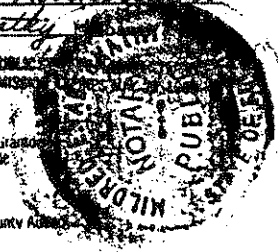
John E. Rosino
Flynn, Py & Kruse, LEA
165 East Washington Row
Sandusky, Ohio 44870

This conveyance has been examined and the grantor complied with section 310-232 of the Revised Code.

FEES \$ 75.00

EXEMPT

James McKeen, County Auditor



0344923

WARRANTY DEED

FROM: 24 DEC 28 NO 54

Bechtel-McLaughlin, Inc.
JOHN C. SCHERER
an Ohio corporation

TO:
B & F Properties
an Ohio partnership

RECEIVED FOR RECORD

December 28th, 1984

10:54 o'clock A.M.

Recorded December 31st, 1984

Erle County Records

Volume 513, Page 187-188

John C. Scherer, Recorder

ENTERED FOR TRANSFER

Dec 28 1984

James A. McKean

Jan 1, 1985

710 8810

This instrument prepared by:
Equity Title Agency, Inc.
1400 Park 575
Sandusky, Ohio 44870

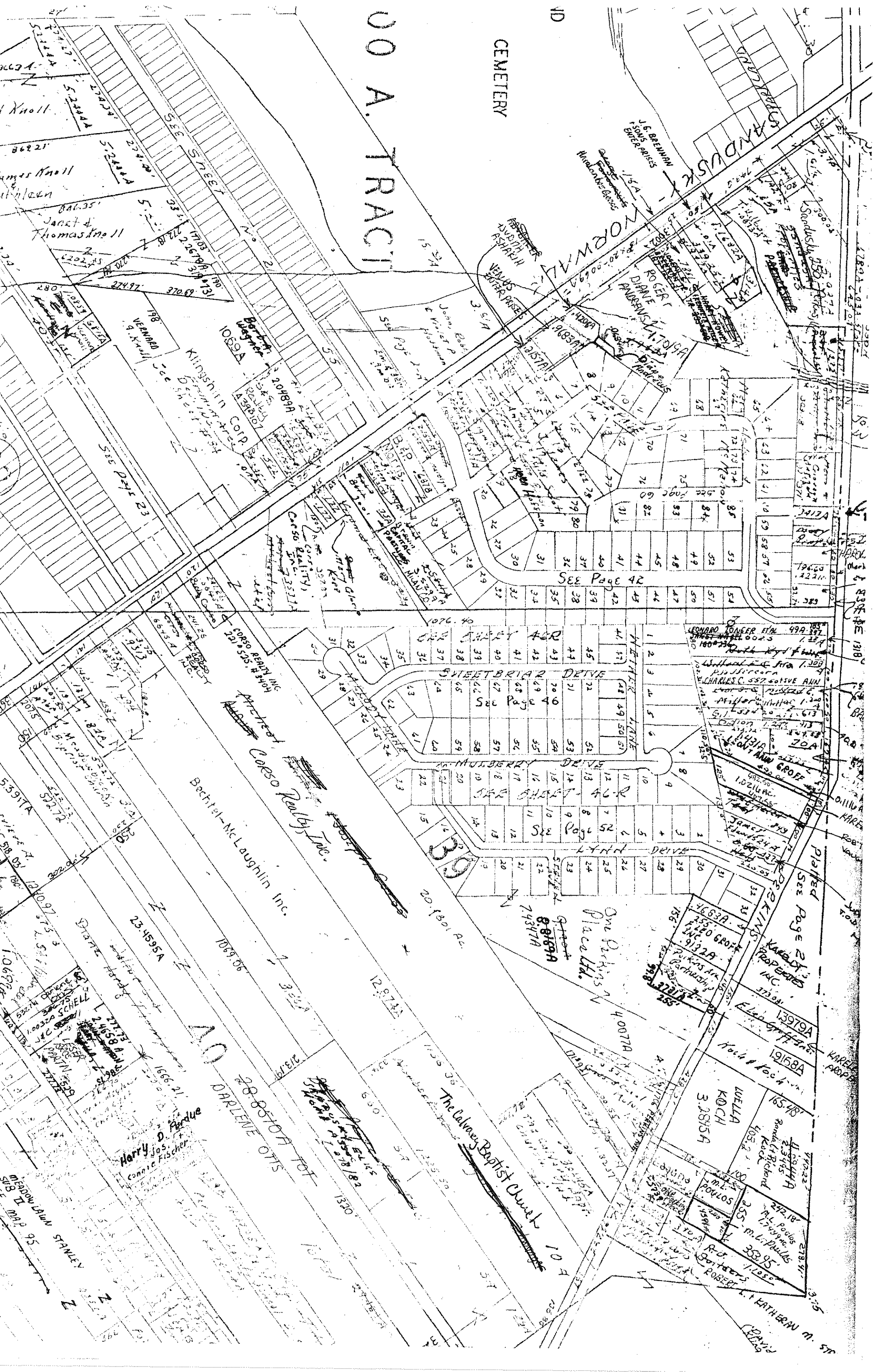
APPENDIX B-2

Tax Maps and Property Ownership Information

00 A. TRACT

CEMETERY

ID



James Knoll
Janet & Thomas Knoll

Kindship Corp
1089A

SWEET BRIAR DRIVE
SEE PAGE 42

CORSO REALTY INC
Architect
CORSO REALTY INC

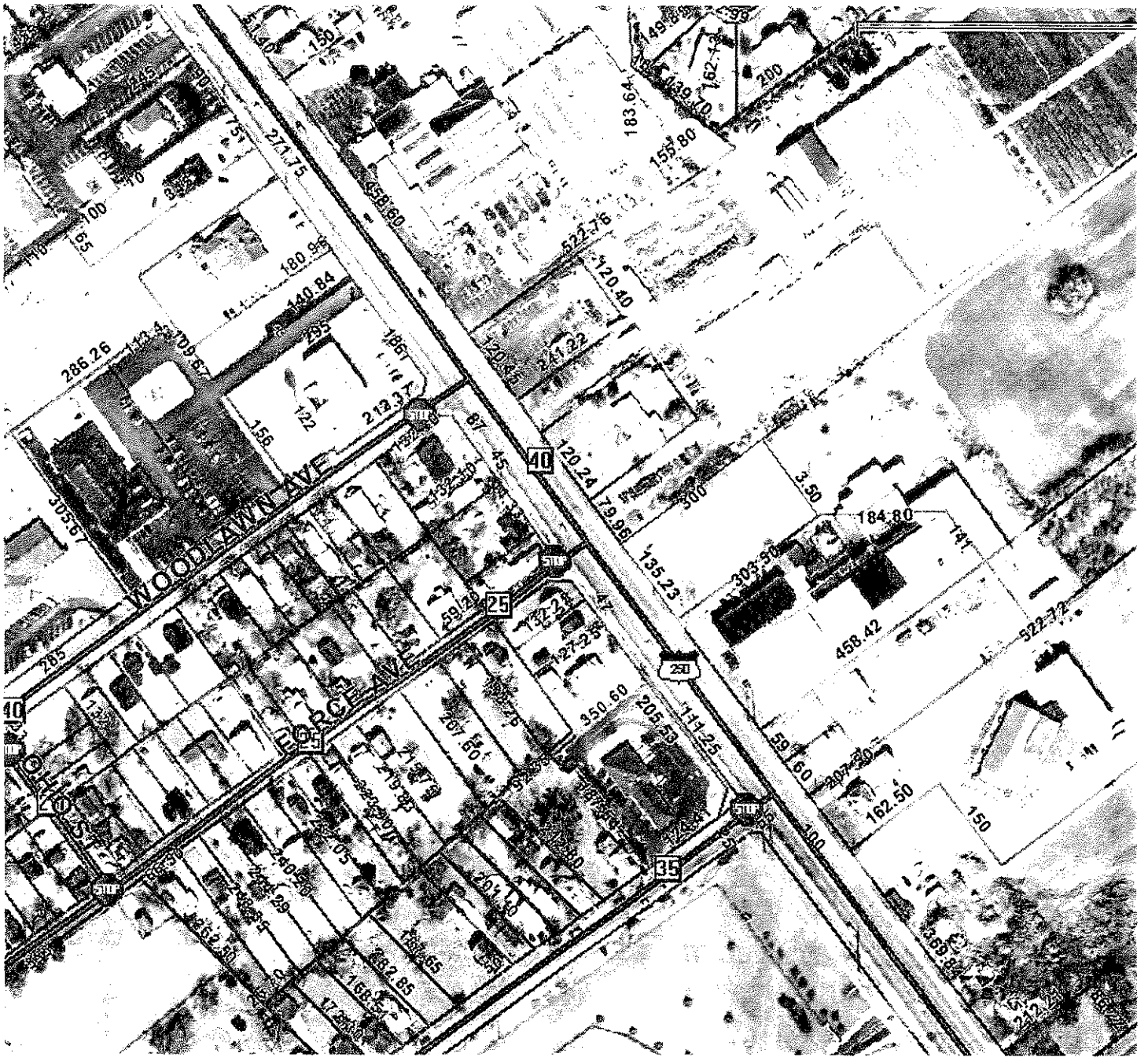
WATER LINE
ONE PARKING PLACE

HARRY O. FARDUE
CONNIE FISCHER

The Calvary Baptist Church
10 A

WELLA KOCH
32854
ROBERT L. KATHERN M. ST

1789A-1031-1032
1789B-1031-1032
1789C-1031-1032
1789D-1031-1032
1789E-1031-1032
1789F-1031-1032
1789G-1031-1032
1789H-1031-1032
1789I-1031-1032
1789J-1031-1032
1789K-1031-1032
1789L-1031-1032
1789M-1031-1032
1789N-1031-1032
1789O-1031-1032
1789P-1031-1032
1789Q-1031-1032
1789R-1031-1032
1789S-1031-1032
1789T-1031-1032
1789U-1031-1032
1789V-1031-1032
1789W-1031-1032
1789X-1031-1032
1789Y-1031-1032
1789Z-1031-1032



255921

VOL 422 PAGE 563

Know all Men by these Presents

aka Lydia R. Bechtel

That, we, Ronald W. Bechtel and Lydia Bechtel, husband and wife,

, the Grantor s,

for the consideration of Ten Dollars and other good and valuable consideration

received to our full satisfaction of

Bechtel-McLaughlin, Inc.

the grantee,

whose tax mailing address will be 3612 Milan Road, Sandusky, Ohio 44870

do Give, Grant, Bargain, Sell and Convey unto the said Grantee, its successors and assigns, the following described premises, situated in the Township of

Perkins County of Erie and State of Ohio:

Being those parts of Lots 39 and 40, Hallam Tract, Section 2, Perkins Township, Erie County, Ohio, as follows:

Beginning at a point in the line between said Lots 39 and 40, North 52° 24' East, 499.67 feet from its intersection with the centerline of Milan Road, State Route 250; thence South 37° 29' East, 119.00 feet to the northwesterly line of lands now or formerly owned by Meadowbrook Baptist Church; thence North 52° 24' East, along last mentioned line and said line produced northeasterly 1283.18 feet to the southwesterly line of lands now or formerly owned by Catherine M. Yepsen; thence North 30° 07' West, along last mentioned line, 120.02 feet to the line between Lots 39 and 40; thence North 52° 24' East, along last mentioned line, about 277.00 feet to the southwesterly line of lands now or formerly owned by Norbert W. and Marjorie A. Swanger; thence northwesterly along last mentioned line, 334.00 feet to the southwesterly line of lands now or formerly owned by Michael, Phillip and Joseph Corso; thence South 52° 54' West, along last mentioned line, about 1774.00 feet to a point in said line which is 300.00 feet north-easterly from the centerline of Milan Road; thence South 36° 54' 12" East, 135.23 feet to the northwesterly line of lands conveyed to Bechtel-McLaughlin, Inc. by deed recorded in Volume 301, Page 416, Erie County Deed Records; thence North 52° 24' East, along last mentioned line, 44.75 feet to a point; thence North 85° 35' East, still along said Bechtel-McLaughlin, Inc. lands, 184.80 feet to a point; thence South 37° 29' East, still along Bechtel-McLaughlin, Inc. lands, 100.00 feet to the place of beginning and containing 16.434 acres, more or less.

Foregoing description prepared by Paul W. Hemrick, Registered Surveyor No. 4082.

This document has been examined and found to conform with the provisions of the Ohio Constitution and the Ohio Revised Code.
49.40
148.20
GRAND JUDGE, CLEVELAND, County Auditor

indestructible estate in PER SIMPLE, and have good right to bargain and sell the same in any form as above written and that the same are free from all incumbrances whatsoever except taxes for the last half of 1958 and thereafter, assessments, if any, easements and restrictions of record, and zoning laws and regulations,

and that I will WARRANT AND DEFEND said premises, with the appurtenances thereto belonging, to the said Grantee, its successors and assigns, against all lawful claims and demands whatsoever except as aforesaid.

And for valuable consideration I, Lydia Bechtel, wife of Grantor herein,

do hereby remise, release and forever quit-claim unto the said Grantee, its successors and assigns, all my 2 right and expectancy of dower in the above described premises.

In Witness Whereof, we have hereto set our hands, the 21 day of May, in the year of our Lord one thousand nine hundred and fifty-nine.

Witness my hand and seal in the presence of
 X _____
 X _____

Ronald M. Bechtel
Lydia A. Bechtel

STATE OF OHIO } ss. Before me, a notary public
 Erie County, } in and for said County and State, personally
 appeared the above named, Ronald M. Bechtel and Lydia Bechtel, husband and wife,

who acknowledged that they did sign the foregoing instrument and that the same is their free act and deed.

In testimony whereof, I have hereto set my hand and official seal, at Sandusky, Ohio, this 21 day of May, A. D. 19 59.



Notary Public

This instrument prepared by:
 RUSSELL A. RAMSEY
 Sandusky, Ohio

164757

FILED

WARRANTY DEED

FROM
 Ronald M. Bechtel

TO
 Bechtel-McLaughlin, Inc.

DATE
 JUL 20 1959

BY
 C. E. A. SPEER

RECORDED FOR RECORD
 July 20th, 1959

FILED
 July 22nd, 1959

Volume 301 Page 416-417

Notary
 C. E. A. Speer

RECORDED FOR TRANSFER

22nd Floor

THE ERIE COUNTY TITLE CO. 27 S.O.

Erie County, Ohio

the Grantor

for the consideration of Ten and no/100
and other good and valuable considerations

Dollars

\$ 10.00

received to my

full satisfaction of

Bechtel-McLaughlin, Inc., a corpora-

tion of Perkins Township, Erie County, Ohio

the Grantee do give, grant, bargain,

sell and convey unto the said Grantee, its successors and assigns, the following described premises, sit-

uated in the Township of Perkins County of Erie

and State of Ohio

Those part of lots numbers thirty-nine (39) and forty (40), in the
Hallam Tract (so-called), in section number two (2), in Perkins Township,
Erie County, Ohio, bounded and described as follows:

Beginning in the easterly line of Milan Road (so-called) at a point
south 37 degrees 29 minutes east, a distance of 119.00 feet from its
intersection with the northerly line of said lot number 40; running
thence north 52 degrees 24 minutes east, parallel with the northerly
line of said lot number 40, a distance of 458.42 feet to the southwest
corner of the land conveyed to Ronald W. Bechtel, by deed dated August
31, 1957, and recorded in Volume 283 of Deeds page 433, Erie County,
Ohio records; thence north 37 degrees 29 minutes west, parallel with
the easterly line of Milan Road and along the westerly line of the land
conveyed to Ronald W. Bechtel, as aforesaid, a distance of 119.00 feet
to the northerly line of said lot number 40, same being the southerly
line of said lot number 39; thence continuing north 37 degrees 29 minutes
west, parallel with the easterly line of Milan Road, a distance of 100.00
feet to an iron stake; thence south eighty-five degrees thirty five
minutes West (S 85 degrees 35' W) a distance of one hundred eighty-four
and eight tenths feet (184.8') to a point; thence south fifty-two degrees
twenty-four minutes west (S 52 degrees 24' W) and parallel to the southerly
line of said lot Thirty-nine (39), a distance of three hundred three and
five tenths feet (303.5') to a point in the easterly line of Milan Road;
thence south thirty-seven degrees twenty-nine minutes east (S 37 degrees
29' E) in the easterly line of Milan Road to the place of beginning,
EXCEPTING HOWEVER from the above described premises so much thereof as
have heretofore been conveyed by Grantor herein to Grantee herein, which
conveyances are as follows:

- (1) As recorded in Deed Volume 240, page 10.
- (2) As recorded in Deed Volume 242, page 535.
- (3) As recorded in Deed Volume 243, page 481.
- (4) As recorded in Deed Volume 236, page 320 EXCEPT
so much of said premises as were conveyed by
Bechtel-McLaughlin, Inc. to Ronald W. Bechtel
by deed recorded in Deed Volume 283, page 433.

It is the intention that the lands conveyed by this instrument,
and by the recorded deeds as noted in the four EXCEPTIONS above, shall now
constitute one parcel of land which conforms to so much of the description
first above appearing as precedes the words "EXCEPTING HOWEVER".

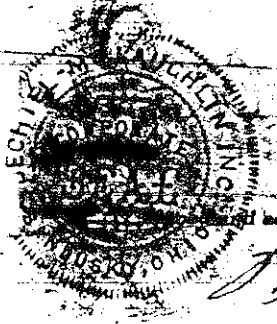
The premises hereby conveyed contain 0.447 acres, more or less.

be the same more or less but subject to all legal highways

be the same more or less, but subject to all legal highways, To have and to hold the above granted and bargained premises, with the appurtenances thereunto belonging, unto the said grantee, his heirs and assigns forever. And the said grantor does for itself and its successors and assigns covenant with said grantee, his heirs and assigns, that at and until the ensembling of these presents it is well seized of the above described premises as a good and indefeasible estate in fee simple, and has good right to bargain and sell the same in manner and form as above written; that the same are free and clear from all incumbrances whatsoever except taxes and assessments for the last half of 1936 and thereafter

and that it will warrant and defend said premises, with the appurtenances thereunto belonging, to the said grantee, his heirs and assigns, forever, against all lawful claims and demands whatsoever.

In witness whereof said corporation sets its hand and corporate seal, by Ronald W. Bechtel, its President and Russell A. Ramsey, its Secretary this 31st day of August, A. D. 1957



and I acknowledged in the presence of Doris K. Marquart

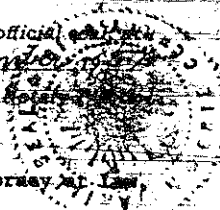
By Russell A. Ramsey Secy

THE STATE OF OHIO
Erie County

Before me, a Notary Public in and for said County, personally appeared the above named Bechtel-McLaughlin, Inc.

by Ronald W. Bechtel, its President and Russell A. Ramsey, its Secretary who acknowledged that they did sign the foregoing instrument and that the same is the free act and deed of said corporation and the free act and deed of each of them personally and as such officers.

In testimony whereof I have hereunto set my hand and official seal at Sandusky Ohio, this 6th day of September, 1957
Doris K. Marquart



The foregoing deed was prepared by Russell A. Ramsey, Attorney at Law, 312 Washington Building, Sandusky, Ohio.

153515
WARRANTY DEED
FROM SEP 27 1957
BECHTEL-MC LAUGHLIN, INC.
ERIE COUNTY RECORDER
TO
RONALD W. BECHTEL

RECEIVED FOR RECORD
September 7th 1957
at 11:36 o'clock A.M.
Recorded September 8th 1957
in Erie County Records
Volume 283 Page 433-434
CARL A. SPAIN
RECORDER
ENTERED FOR TRANSFER
SEP 11 1957

2.75
THE OHIO CALL BOOK CO., CLEVELAND
RAMSEY AND DIDELIUS
WASHINGTON BUILDING
SANDUSKY, OHIO 2.75

Know all Men by these Presents:

That Bechtel-McLaughlin, Inc.

a Corporation incorporated under the laws of the State of Ohio the Grantor,

who claims title by or through instrument recorded in Volume _____, Page _____, County

Recorder's Office, for the consideration of Ten and no/100 Dollars

(\$10.00) received to its full satisfaction of Ronald W. Bechtel

the Grantee,

whose TAX MAILING ADDRESS will be Milan Road, Sandusky, Ohio

do give, grant, bargain, sell and convey unto the said Grantee, his heirs and assigns, the fol-

lowing described premises situated in the Township of Perkins

County of Erie and State of Ohio:

Being a part of Lot No. 40 in Section No. 2 and more fully described as follows:

Beginning at an iron stake set in the northwesterly boundary line of said Lot No. 40, which stake is North 52 degrees and 24 minutes East a distance of 458.42 feet from an iron stake which marks the intersection of said northwesterly boundary line of Lot No. 40 with the northeasterly boundary line of the Milan-Sandusky Road, so-called, thence;

- (1) Continuing in the same course, namely, North 52 degrees and 24 minutes East along said northwesterly boundary line of Lot No. 40, a distance 1299.06 feet more or less, thence;
- (2) South 30 degrees and 07 minutes East along the southwesterly boundary line of lands now or formerly standing in the name of Peter Yepsen a distance of 120.02 feet, thence;
- (3) South 52 degrees and 24 minutes West in the Grantors southwesterly boundary line, parallel to the above mentioned lot line, a distance of 1283.18 feet more or less to an iron stake, thence;
- (4) North 37 degrees and 29 minutes West, parallel to the center line of Sandusky-Milan Road a distance of 119.0 feet to the place of beginning containing 3.56 acres of land, more or less, subject to easements and restrictions of record.



TO HAVE AND TO HOLD the above granted and bargained premises, with the appurtenances thereunto the said Grantor, its successors and assigns forever. And I, the said Grantor, myself and my heirs, executors and administrators, covenant with the said Grantee, its successors and assigns; that at and until the encasing of these presents, I will raise of the above described premises, as a good and indefeasible estate, in FREE SIMPLE, and have good right to bargain and sell the same in manner and form as above written, and that the same are free from all incumbrances whatsoever except a mortgage to the Third National Exchange bank, dated June 27, 1955, and recorded in Erie County Mortgage Volume 17, at page 595, securing a debt described therein which the Grantee herein assumes and agrees to pay; also taxes for the last half of 1956 and thereafter

and that I will WARRANT AND DEFEND said premises, with the appurtenances thereunto belonging, to the said Grantee, its successors and assigns, against all lawful claims and demands whatsoever except said mortgage and taxes

And for valuable consideration I, Lydia Bechtel, wife of Grantor herein

do hereby remise, release and forever quit-claim unto the said Grantor, its successors and assigns, all my right and expectancy of dower in the above described premises.

In Witness Whereof, we have hereunto set our hands, the 31st day of August, in the year of our Lord one thousand nine hundred and fifty-seven

Signed and acknowledged in the presence of
Russell A. Ramsey
Lydia Bechtel
Ronald W. Bechtel
James P. Bickel

STATE OF OHIO } ss. Before me, a Notary Public
 Erie County, } in and for said County and State, personally
 appeared the above named Ronald W. Bechtel and Lydia Bechtel, husband and wife

who acknowledged that they did sign the foregoing instrument and that the same is their free and voluntary act and deed

In testimony whereof, I have hereunto set my hand and official seal, at Sandusky, Ohio, this 6th day of September A.M. 1957



James P. Bickel
 Notary Public

This deed was prepared by Russell A. Ramsey, Attorney at Law, 312 Washington Building, Sandusky, Ohio

1535

RECORDED FOR INDEXING
 SEPTEMBER 27th
 1957

FILED
 SEPTEMBER 27th 1957
 SANDUSKY, OHIO

Page 1535-1536

1155

Know all Men by these Presents, That Ronald W. Bechtel, of Perkins Township,
Erie County, Ohio,



the Grantor

for the consideration of Ten Thousand and no/100 Dollars,
(\$ 10,000.00) received to his full satisfaction of Bechtel-McLaughlin, Inc., a corporation
of Sandusky, Ohio

the Grantee do give, grant, bargain,
sell and convey unto the said Grantee, its successors and assigns, the following described premises, sit-
uated in the Township of Perkins, County of Erie
and State of Ohio:

Being a part of Lot No. 39 in Section No. 2 and more fully described
as follows:

Beginning at an iron stake in the southeasterly line of said Lot No.
39, which stake is North 52 degrees and 24 minutes East a distance of
458.42 feet from an iron stake which marks the intersection of the south-
easterly line of said Lot No. 39 with the northeasterly line of Milan Road
(also-called Sandusky-Milan Road) thence;

- (1) North 37 degrees and 29 minutes West, parallel with the
center line of said Sandusky-Milan Road, a distance of
100.00 feet to an iron stake, thence;
- (2) South 85 degrees and 35 minutes West a distance of 75.09
feet to a point, thence;
- (3) South 52 degrees and 24 minutes West, parallel with the
southeasterly boundary line of said Lot No. 39, a distance
of 90.00 feet;
- (4) Thence northwesterly and at right angles with said last
mentioned course, a distance of 36 1/2 feet (36' 6")
- (5) Thence southwesterly and at right angles with said last
mentioned course, a distance of 41.00 feet
- (6) Thence Southeasterly and at right angles with said last
mentioned course, a distance of 36 1/2 feet (36' 6")
- (7) Thence South 52 degrees and 24 minutes, parallel with the
Southwesterly boundary of said Lot No. 39, and in pro-
longation of the course described in sub-paragraph three
(3) hereof to a point in the Northeasterly boundary line of
said Milan-Sandusky Road
- (8) South 37 degrees and 29 minutes East along the last above
mentioned road boundary line a distance of 141.00 feet to
the southeasterly boundary line of said Lot No. 39, thence;
- (9) North 52 degrees and 24 minutes East along said southeasterly
boundary line of Lot No. 39, a distance of 458.42 feet to
the place of beginning, containing 1.494 acres of land more
or less, subject however to all restrictions, and zoning
ordinances of record.

The State of Ohio,

Lucas

County,

ss.

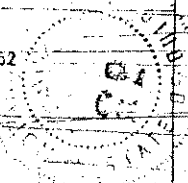
Be it Remembered, That on the 31st day of March, in the year of our Lord One Thousand Nine Hundred and Fifty, before me, the subscriber, a Notary Public within and for said County, personally came Gwyneth Hitchcock Bechtel,

the grantor in the above conveyance, and acknowledged the signing thereof to be her voluntary act and deed, for the purposes therein mentioned.

In Witness Whereof, I have hereunto subscribed my name and affixed my official seal on the day and year aforesaid.

[Signature]
Notary Public, Lucas County, Ohio

My Comm. Expires Dec. 17, 1952



Quit-Claim Deed,

with best power

From
Gwyneth Hitchcock Bechtel
To
Ronald M. Bechtel

1951 AUG 10 Post Office Address
P.O. Box 101
P.O. 241

RECORDED
FBI, C. S. 1110

Transferred AUG. 10 1951

[Signature]

County Auditor

Recorder's Office

ERIC

County

Received for Record Aug. 10th, 1951.

at 2:30 P.M. and

Recorded in Vol. 827

Page 203-204

Recorded Aug. 15, 1951

130 Total

Recorder

LEGAL BLANKS
The Rankins Printing & Engraving Co.
226-230 Huron Street, Toledo, Ohio

120098

Be it Known, That Gwyneth Hitchcock Bechtel, divorced
and unmarried,

in consideration of One Dollar (\$1.00) and other valuable considerations

to her paid by Ronald W. Bechtel,

do hereby bargain, sell and Quit-Claim to the said

Ronald W. Bechtel, his

heirs and assigns forever, the following Real Estate, viz.:

Situated in the Township of Perkins, County of Erie and State
of Ohio:

The southeasterly 25 acres of that part of Lot No. 39 in the
Hallam Tract (so-called) in Section No. 2 in Perkins Township,
Erie County, Ohio, lying southerly of the center line of
Perkins Avenue. The northwesterly line of said premises being
parallel with the southeasterly line of said Lot No. 39 and
northwesterly therefrom far enough to include 25 acres except-
ing therefrom, however, 10 acres off the northeast part thereof
sold to Schwanger.

Subject to all legal highways.

Together with all the privileges and appurtenances to the same belonging, to have
and to hold the same to the said grantee his heirs and assigns forever;
hereby covenanting that the title conveyed is clear, free and unincumbered by any
act of the grantor herein.

In Witness Whereof, the said grantor hereunto set her hand

this 1st day of March, A. D. One Thousand Nine
Hundred and Fiftty.

Signed, acknowledged and
delivered in presence of

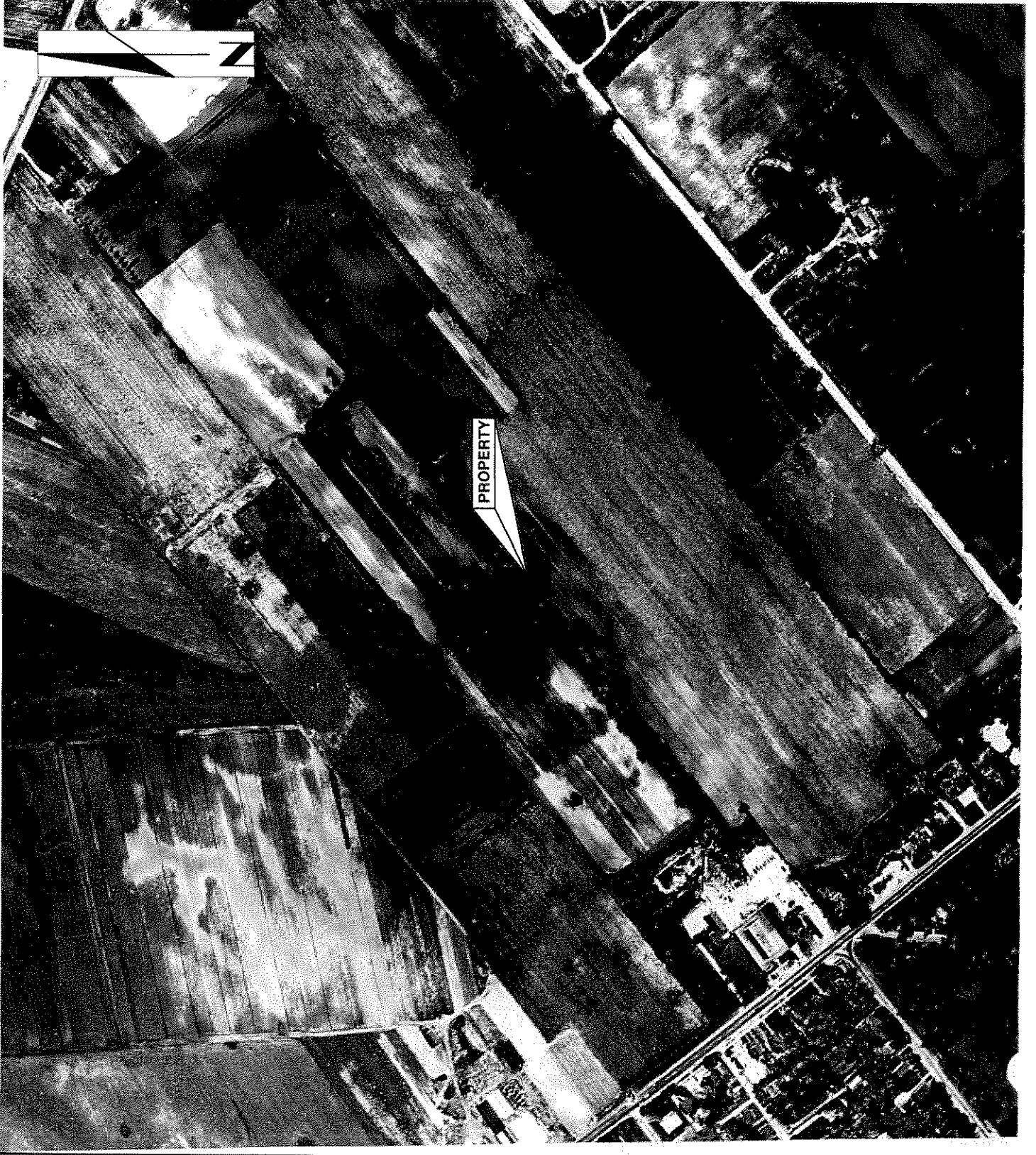
Gwyneth Hitchcock Bechtel
Gwyneth Hitchcock Bechtel

Franklin A. Hayward
Dave Martin

APPENDIX B-3
Aerial Photographs

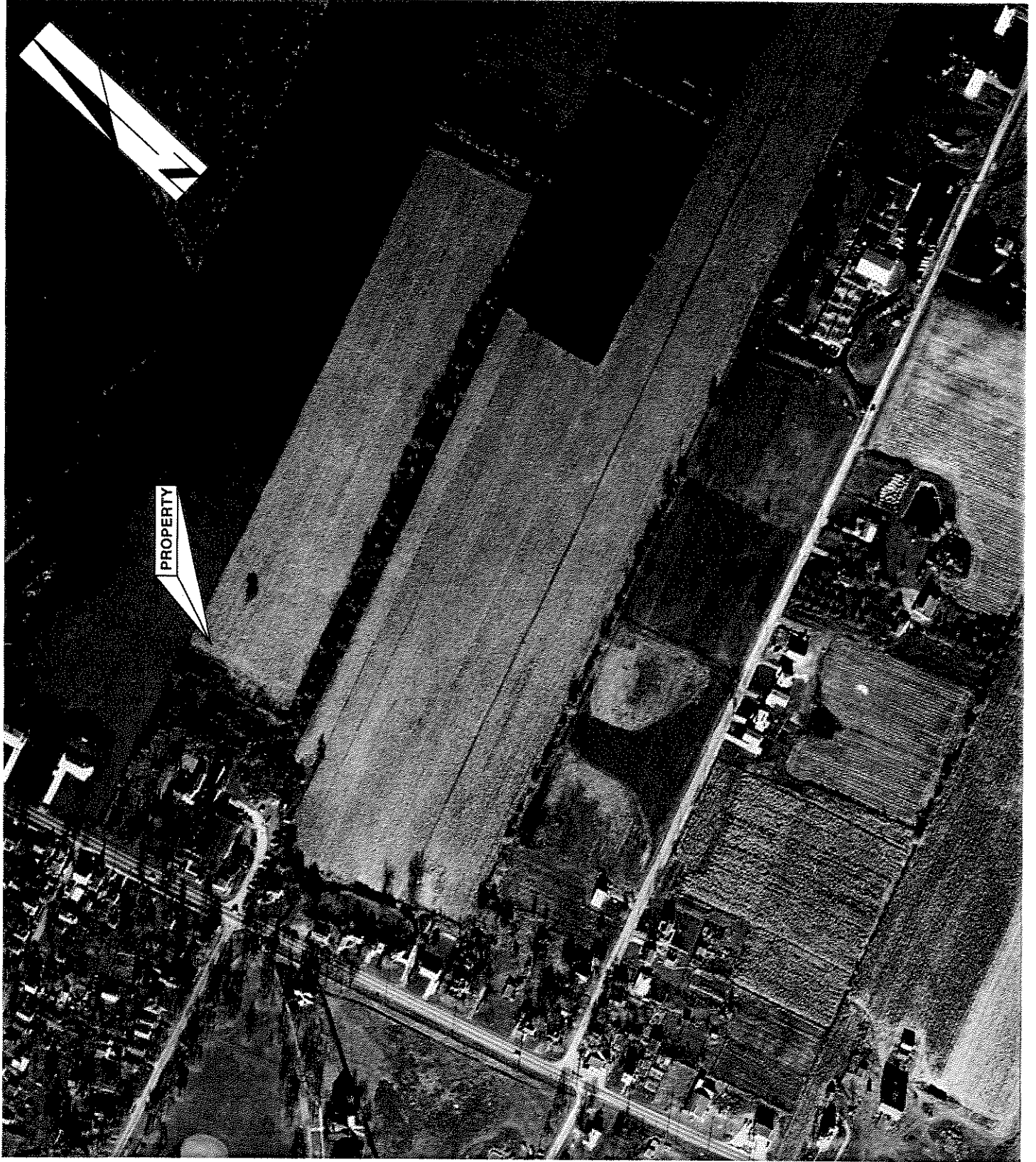
1950
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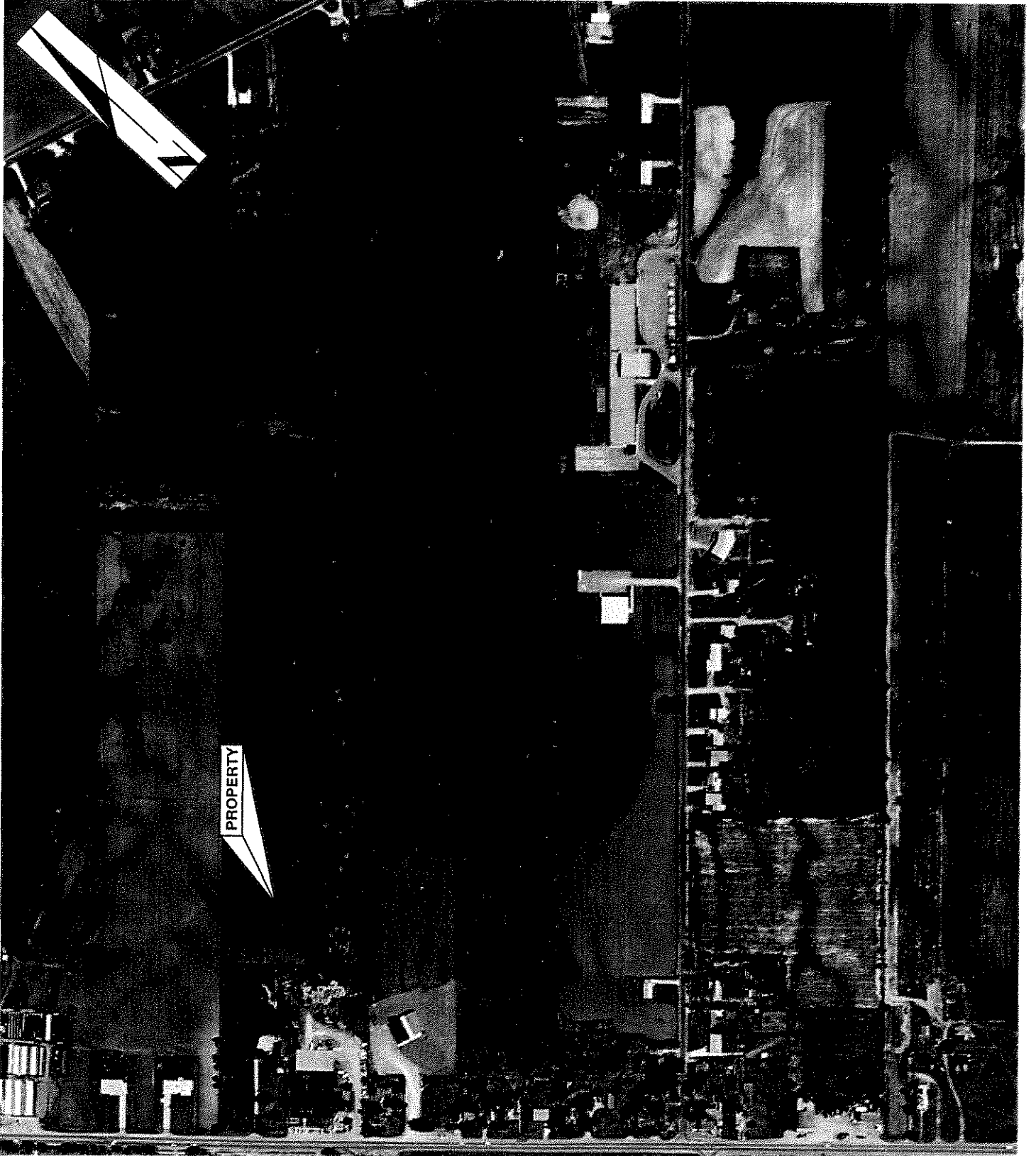
1956

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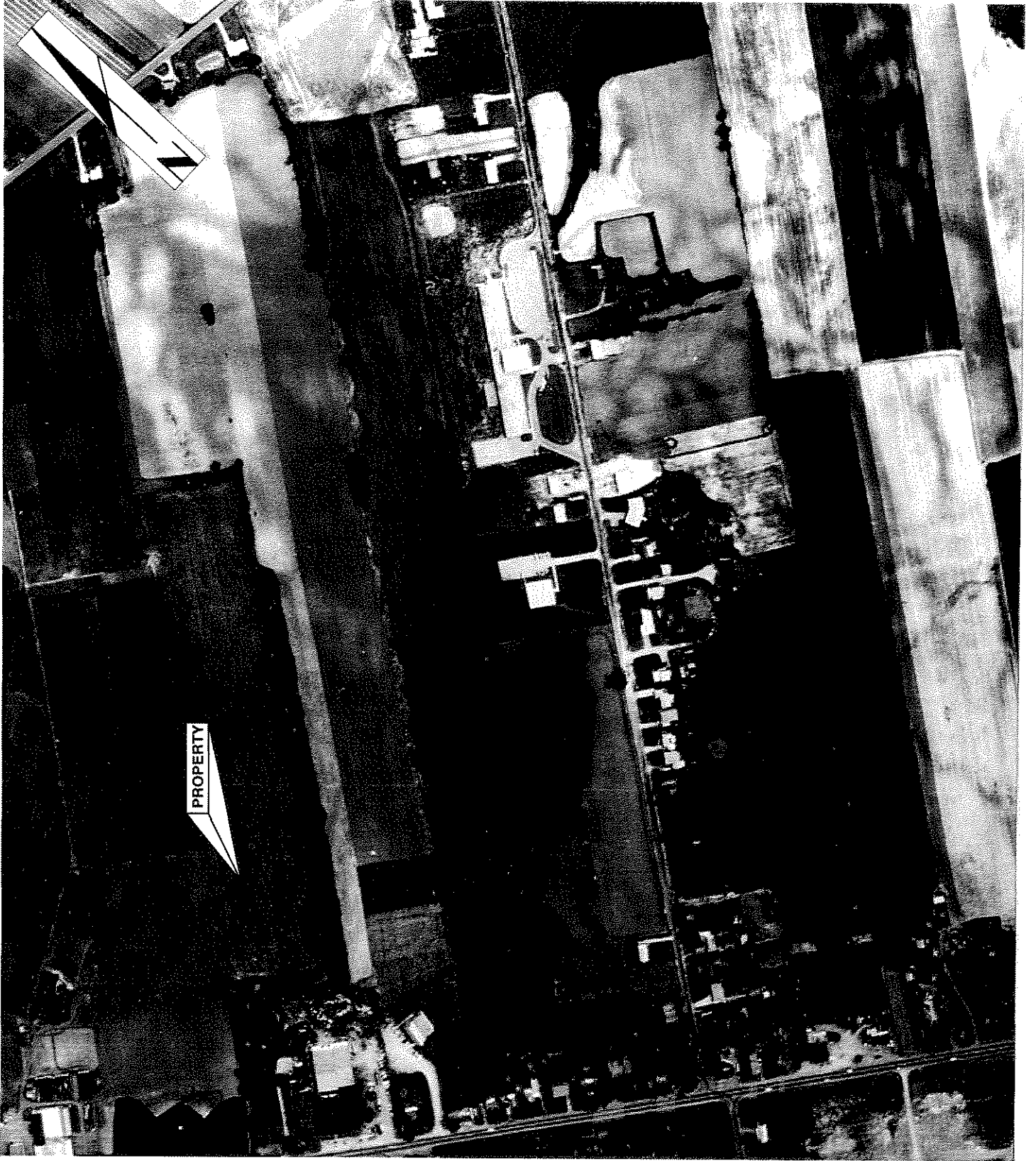
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1964

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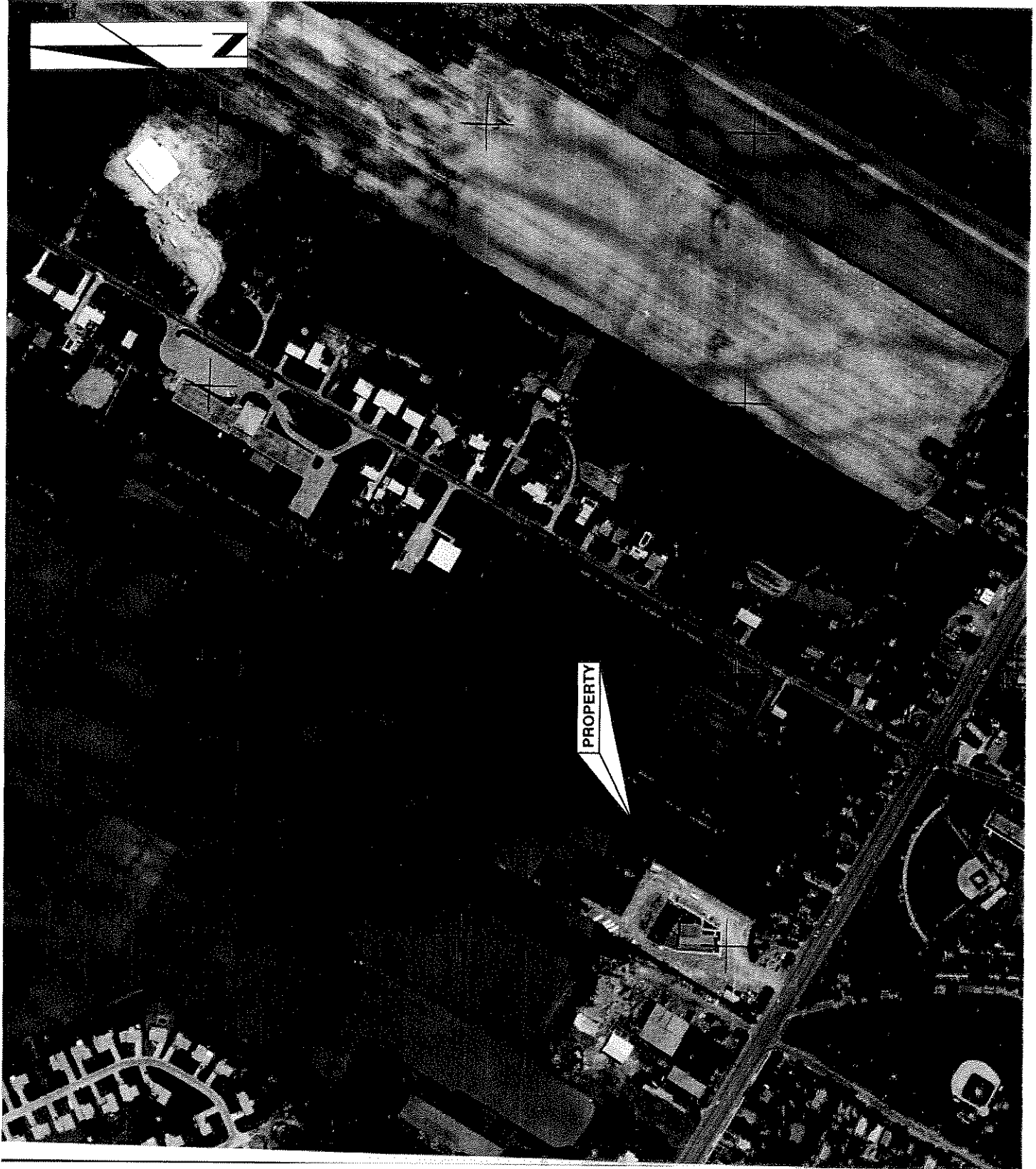


1966

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1973

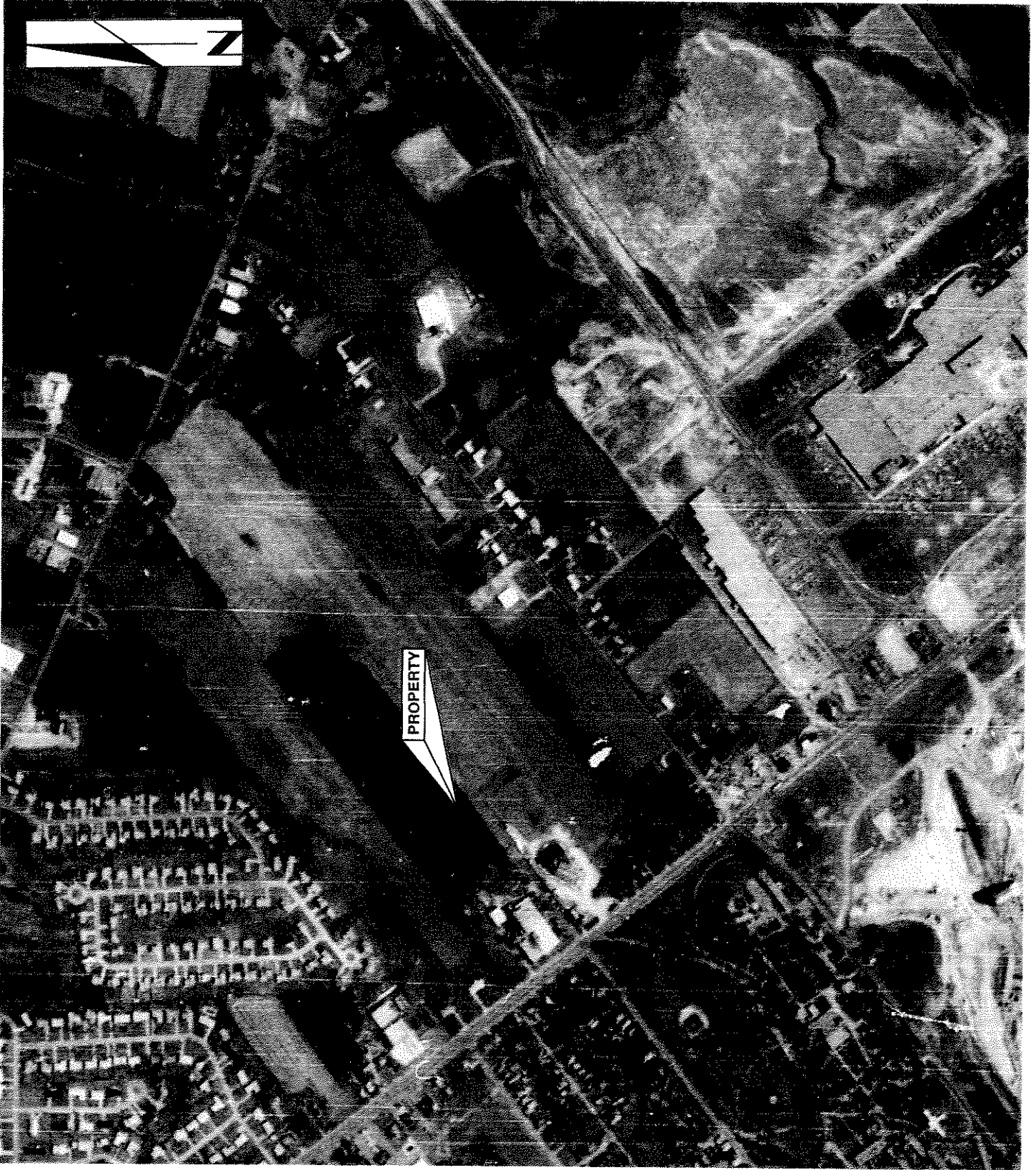
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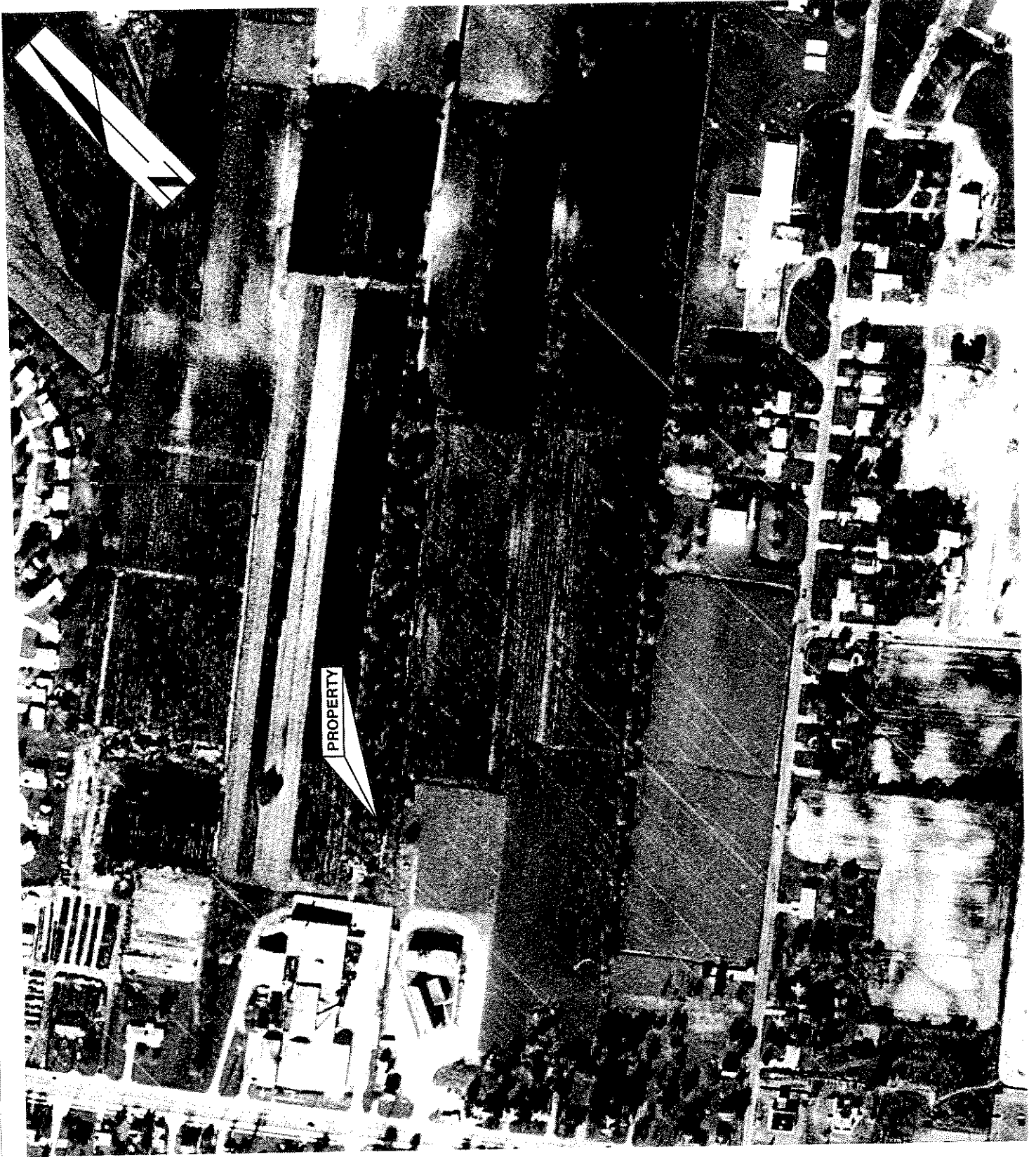
1974

1"=400'



1977

1":666'



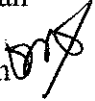
1988

1"=400'

APPENDIX C

Previous Studies

Memorandum

To: Adam Altman
From: Dan Herman 
Date: December 17, 2002
Re: HEM078 – client supplied environmental reports

Adam,

Enclosed please find a copy of a letter dated April 9, 2002 from Robert W. Hare to Dave Herzer re: Bechtel-McLaughlin Inc. and a copy of a transmittal from Marsha Collett to Richard Stone, Esq. dated July 30, 2000 re: Risk Assessment review comments for Bechtel-McLaughlin, Inc. by U.S. EPA region 5.



POLLUTION PREVENTION ASSOCIATES
ENVIRONMENTAL MANAGEMENT SERVICES

Privileged And Confidential
Prepared At The Request of Council

9 April 2002

Wickens, Herzer, Panza, Cook & Batista
1144 West Erie Avenue
P.O. Box 840
Lorain, Ohio 44052-0840

Attention: Dave Herzer

cc: Charles E. Ohlemacher, Ralph Harrison

Subject: Bechtel-McLaughlin Inc.
3612 Milan Rd
Sandusky, Ohio

Dear Mr. Herzer:

Pollution Prevention Associates is pleased to provide this remedial approach to support the potential property transaction of the Bechtel-McLaughlin Inc. (BMI) property located at 3612 Milan Road. PPA evaluated groundwater analytical data collected between February 5, 2002 and March 6, 2002 from four permanent monitoring wells and one temporary monitoring well. In addition, we evaluated soil analytical data collected from 15 soil borings between February 5, 2002 and February 6, 2002.

The results of analytical testing were compared against the State of Michigan Department of Environmental Quality (MI DEQ), Part 201 Environmental Remediation, Natural Resources and Environmental Protection Act of 1994 PA 451, as amended, generic cleanup criteria and screening levels dated June 7, 2000. The choice of utilizing the MI DEQ Part 201 standards was based on the rules breadth to cover multiple exposures pathways which are potentially present at the BMI facility. The pathway specific cleanup criteria and screening level values were developed using currently available chemical-specific toxicological and chemical-physical data, exposure data, or other data. The State of Ohio does not currently have equivalent comparison criteria for multiple exposure pathways.

Wickens, Herzer, Panza, Cook & Batista
1 April 2002
Page 2

Privileged And Confidential
Prepared At The Request of Council

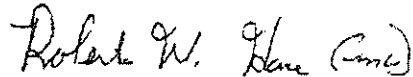
We identified the on-site groundwater and soil direct contact and volatilization to indoor air pathways were identified as being potentially complete pathways at the site. Based on our understanding that the future use of the site is for retail shops, we assumed the future use of the site as a Subcategory III commercial property. The vinyl chloride level in MW-1 was shown to be the above the direct contact and groundwater to indoor air criteria. All other data were below the MI DEQ Part 201 criteria.

All soil test data resulted in no contaminants measured above action levels in the concrete and soils at locations tested.

We appreciate the opportunity to provide environmental consulting services on this project. Please do not hesitate to call if you have any questions or comments.

Sincerely yours,

POLLUTION PREVENTION ASSOCIATES

Handwritten signature of Robert W. Hare in cursive script.

Robert W. Hare, P.E., REM, CHMM
Vice-President

TABLE 1 - MICHIGAN PART 201 COMPARISON CRITERIA
 Basford-Hill, Leighton Inc.
 Sandusky, Ohio

Monite	Client ID	Compound	Results	Flag	Units	Ind and Com 234 GW to Indoor Air	Groundwater Contact Criteria	Ind and Com 234 Rad 16 Indoor Air	Com 1 Digest Contact Soil
UNITS OF MEASUREMENT									
Groundwater	MW-1	Volatile Organics	1470.00		ug/L	990	670		
COMPARISON CRITERIA									
Groundwater	GA-20	1,1,1-Trichloroethane	2.20		ug/L	190000	190000		
Groundwater	GA-20	1,1-Dichloroethane	8.20		ug/L	290000	240000		
Groundwater	GA-20	1,1-Dichloroethene	0.80 U		ug/L	1500	1100		
Groundwater	GA-20	1,2,4-Trichlorobenzene	1.80		ug/L	5900	5600		
Groundwater	GA-20	1,2-Dichlorobenzene	0.50 U		ug/L	16000	16000		
Groundwater	GA-20	1,3,5-Trichlorobenzene	0.50 U		ug/L	61000	61000		
Groundwater	GA-20	2-Butanone (MEK)	8.25 U		ug/L	34000000	24000000		
Groundwater	GA-20	Acetone	10.00 U		ug/L	190000000	31000000		
Groundwater	GA-20	Benzene	0.50 U		ug/L	3600	1100		
Groundwater	GA-20	Carbon disulfide	0.50 U		ug/L	50000	120000		
Groundwater	GA-20	cis-1,2-Dichloroethene	1.20		ug/L	22000	20000		
Groundwater	GA-20	Ethylbenzene	0.50 U		ug/L	17000	17000		
Groundwater	GA-20	n-Butylbenzene	0.50 U		ug/L	0	600		
Groundwater	GA-20	Naphthalene	2.50 U		ug/L	3100	3100		
Groundwater	GA-20	p-Isopropyltoluene	0.50 U		ug/L	NA	NA		
Groundwater	GA-20	Terachlorobenzene	0.50 U		ug/L	17000	17000		
Groundwater	GA-20	Toluene	2.50 U		ug/L	59000	12000		
Groundwater	GA-20	trans-1,2-Dichloroethene	0.50 U		ug/L	20000	20000		
Groundwater	GA-20	Trichloroethene	10.00		ug/L	9700	3700		
Groundwater	GA-20	Vinyl Chloride	4.00		ug/L	60	370		
Groundwater	GA-20	Xylenes	1.80		ug/L	19000	19000		
Groundwater	MW-1	1,1,1-Trichloroethane	0.50 U		ug/L	190000	190000		
Groundwater	MW-1	1,1-Dichloroethane	0.50 U		ug/L	290000	240000		
Groundwater	MW-1	1,1-Dichloroethene	13.40		ug/L	1500	1100		
Groundwater	MW-1	1,2,4-Trichlorobenzene	3.80		ug/L	5900	5600		
Groundwater	MW-1	1,2-Dichlorobenzene	6.30		ug/L	16000	16000		
Groundwater	MW-1	1,3,5-Trichlorobenzene	0.80 U		ug/L	61000	61000		
Groundwater	MW-1	2-Butanone (MEK)	10.25 U		ug/L	24000000	24000000		
Groundwater	MW-1	Acetone	10.00 U		ug/L	190000000	31000000		
Groundwater	MW-1	Benzene	1.40		ug/L	3600	1100		
Groundwater	MW-1	Carbon disulfide	2.80		ug/L	50000	120000		
Groundwater	MW-1	cis-1,2-Dichloroethene	11600.00		ug/L	22000	20000		
Groundwater	MW-1	Cyanide, Total	78.00		ug/L	16.0	57000		
Groundwater	MW-1	Ethylbenzene	0.50 U		ug/L	17000	17000		
Groundwater	MW-1	n-Butylbenzene	0.50 U		ug/L	0	600		
Groundwater	MW-1	Naphthalene	2.80 U		ug/L	3100	3100		
Groundwater	MW-1	p-Isopropyltoluene	0.50 U		ug/L	NA	NA		
Groundwater	MW-1	Terachlorobenzene	0.50 U		ug/L	17000	17000		
Groundwater	MW-1	Toluene	4.70		ug/L	59000	12000		
Groundwater	MW-1	trans-1,2-Dichloroethene	1800.00		ug/L	20000	20000		
Groundwater	MW-1	Trichloroethene	308.50		ug/L	9700	3700		
Groundwater	MW-1	Volatile Organics	1770.00		ug/L	990	670		
Groundwater	MW-1	Xylenes	6.70		ug/L	19000	19000		
Groundwater	MW-2	1,1,1-Trichloroethane	0.50 U		ug/L	190000	190000		
Groundwater	MW-2	1,1-Dichloroethane	0.50 U		ug/L	290000	240000		
Groundwater	MW-2	1,1-Dichloroethene	0.30 U		ug/L	1500	1100		
Groundwater	MW-2	1,2,4-Trichlorobenzene	0.50 U		ug/L	5900	5600		
Groundwater	MW-2	1,2-Dichlorobenzene	0.60 U		ug/L	16000	16000		
Groundwater	MW-2	1,3,5-Trichlorobenzene	0.50 U		ug/L	61000	61000		
Groundwater	MW-2	2-Butanone (MEK)	8.25 U		ug/L	24000000	24000000		
Groundwater	MW-2	Acetone	10.00 U		ug/L	190000000	31000000		
Groundwater	MW-2	Benzene	0.50 U		ug/L	3600	1100		
Groundwater	MW-2	Carbon disulfide	0.50 U		ug/L	50000	120000		
Groundwater	MW-2	cis-1,2-Dichloroethene	49.40		ug/L	22000	20000		
Groundwater	MW-2	Cyanide, Total	13.00		ug/L	16.0	57000		
Groundwater	MW-2	Ethylbenzene	0.50 U		ug/L	17000	17000		
Groundwater	MW-2	n-Butylbenzene	0.50 U		ug/L	0	600		
Groundwater	MW-2	Naphthalene	2.80 U		ug/L	3100	3100		
Groundwater	MW-2	p-Isopropyltoluene	0.50 U		ug/L	NA	NA		
Groundwater	MW-2	Terachlorobenzene	0.50 U		ug/L	17000	17000		
Groundwater	MW-2	Toluene	0.80 U		ug/L	59000	12000		
Groundwater	MW-2	trans-1,2-Dichloroethene	2.60		ug/L	20000	20000		
Groundwater	MW-2	Trichloroethene	1.80		ug/L	9700	3700		
Groundwater	MW-2	Vinyl Chloride	09.28		ug/L	60	370		
Groundwater	MW-2	Xylenes	0.80 U		ug/L	19000	19000		
Groundwater	MW-3	1,1,1-Trichloroethane	0.50 U		ug/L	190000	190000		
Groundwater	MW-3	1,1-Dichloroethane	0.50 U		ug/L	290000	240000		
Groundwater	MW-3	1,1-Dichloroethene	0.50 U		ug/L	1500	1100		
Groundwater	MW-3	1,2,4-Trichlorobenzene	0.50 U		ug/L	5900	5600		
Groundwater	MW-3	1,2-Dichlorobenzene	0.50 U		ug/L	16000	16000		
Groundwater	MW-3	1,3,5-Trichlorobenzene	0.50 U		ug/L	61000	61000		
Groundwater	MW-3	2-Butanone (MEK)	8.25 U		ug/L	24000000	24000000		
Groundwater	MW-3	Acetone	10.00 U		ug/L	190000000	31000000		
Groundwater	MW-3	Benzene	0.50 U		ug/L	3600	1100		
Groundwater	MW-3	Carbon disulfide	0.50 U		ug/L	50000	120000		
Groundwater	MW-3	cis-1,2-Dichloroethene	0.50 U		ug/L	22000	20000		
Groundwater	MW-3	Cyanide, Total	77.00		ug/L	16.0	57000		
Groundwater	MW-3	Ethylbenzene	0.50 U		ug/L	17000	17000		
Groundwater	MW-3	n-Butylbenzene	0.50 U		ug/L	0	600		
Groundwater	MW-3	Naphthalene	2.50 U		ug/L	3100	3100		
Groundwater	MW-3	p-Isopropyltoluene	0.50 U		ug/L	NA	NA		
Groundwater	MW-3	Terachlorobenzene	0.50 U		ug/L	17000	17000		
Groundwater	MW-3	Toluene	0.50 U		ug/L	59000	12000		
Groundwater	MW-3	trans-1,2-Dichloroethene	0.50 U		ug/L	20000	20000		
Groundwater	MW-3	Trichloroethene	0.50 U		ug/L	9700	3700		
Groundwater	MW-3	Vinyl Chloride	2.40		ug/L	60	370		
Groundwater	MW-3	Xylenes	0.80 U		ug/L	19000	19000		
Groundwater	MW-4	1,1,1-Trichloroethane	0.50 U		ug/L	190000	190000		
Groundwater	MW-4	1,1-Dichloroethane	0.50 U		ug/L	290000	240000		
Groundwater	MW-4	1,1-Dichloroethene	0.50 U		ug/L	1500	1100		

WILKENS
HERZER
PANZA
COOK &
BATISTA

MATERIAL
35785 Chester Road
Avon, OH 44011
440-930-8000 Main
440-937-4488 Fax

LEGAL PROFESSIONAL ASSOCIATION

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PERSONAL AND CONFIDENTIAL

DATE: 7-30-02
TO: Richard Stone, Esq.
COMPANY NAME: Richard E. Stone Co., L.P.A.
FROM: Marsha Collett
FACSIMILE #: 216 292 7804
CONFIRMATION #: 216-765-1130
OF PAGES: 19 PLUS COVER SHEET
COMMENTS: Here is the USEPA letter - fyc

CLIENT NAME: _____
MATTER NAME: _____
CLIENT NUMBER: _____
DATE/TIME SENT: _____
SENT BY: _____
DATE/TIME CONFIRMED: _____
CONFIRMED BY: _____

CHECK IF APPLICABLE

- CALL FIRST
- CONFIRM RECEIPT
- RETURN TO SENDER IMMEDIATELY



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

Work
COPY

REPLY TO THE ATTENTION OF:

OCT 23 1995

DRP-8J

Mr. John K. Ohlemacher
President
Bechtel-McLaughlin, Inc.
3612 Milan Rd.
Sandusky, OH 44870

RE: Risk Assessment Review Comments
Bechtel-McLaughlin, Inc.
OHD 004 182 614

Dear Mr. Ohlemacher:

The United States Environmental Protection Agency (U.S. EPA) has reviewed your Risk Assessment dated October 6, 1995. Please find enclosed the results of the review.

I will try to contact you the week of October 27, 1996, to discuss what we need to do or how you should respond to these comments. I would first like to speak with my Supervisor prior to contacting you in order to have a better understanding of what she may be expecting.

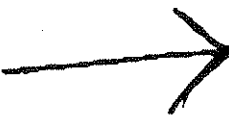
Please contact me, at (312) 886-6943, if you have any questions regarding this matter.

Sincerely,

Thomas Manning

Thomas Manning, Geologist, U.S. EPA

Enclosure:



*LM Done Hagan at
Waley & Aldrich -
216-739-0555*

September 26, 1996

WORK
COPY

To: Julianne Socha, OH/MN Section

From: Richard Mattick, ECAB Risk Assessor *RM*

Re: BMI Risk Assessment Review

Please find attached, my review of the Bechtel-McLaughlin, Inc. (BMI) risk assessment as part of the submitted document entitled "RCRA Equivalency Demonstration" (RED). Per your request, my review has focused strictly on the risk assessment and the data presented in support of the assessment. As you are aware, the purpose of this review was to provide you with comments on the major issues and conclusions BMI has made regarding risk to human health as they relate to the principles of risk assessment as accepted by the EPA. It was not meant to provide you with an exhaustive, technical review of the risk assessment. In addition, as you have requested, I have attempted to characterize the degree of human health risk that may be associated with the submitted data, independent of the conclusions and assessment provided by BMI.

While performing this review, in the essence of time, I have made many assumptions about the data quality and information provided in the text of the document without a complete review of the RED. These assumptions include but are not limited to:

- Assume location, specifications for downgradient wells and soil borings adequately characterize the surface impoundment as a potential source of groundwater and soil contamination.
 - Assume proper selection of chemicals of concern, proper QA/QC methodology involved in sampling and analysis of sampling, etc...
 - Assume statements made about location of nearest private wells and local drinking water supplies are correct
 - Assume background data for soils properly obtained
- Other assumptions, as appropriate are detailed later in the review.

For convenience, I have segregated my review and conclusions by pathway of concern. In general, my review has found the risk assessment to be technically deficient such that strict regulatory conclusions about risk cannot be made. However, after analyzing the submitted data, using approved EPA methodologies and principles, in my judgement, the surface impoundment, as characterized, presents a moderate to low degree of risk to human health.

I'd be happy to present you with any technical analysis I had to perform to reach my conclusions if not included in this review,

if you so request. If you have any questions or comments regarding this review or my conclusions, please call me at 886-8093.

Attachments

cc: George Hamper

Mario Mangino

Tom Manning

Groundwater

Based on the monitoring data presented in Table 2 of the RED and accompanying risk assessment text, it is impossible for me to strictly conclude that levels of metals and organics currently present in the groundwater, do not present a risk to human health. This conclusion is based primarily on 2 items, lack of conclusive data and suspect background concentrations.

BMI has concluded that groundwater does not pose a risk to human health by stating on p.12 that most of the detected constituents are below the MCL's and that those that are not, Nickel and Tetrachloroethene (PERC), are significantly below background levels as established by upgradient well (# MW-1).

After reviewing the data provided in Table 2, I cannot reach the same conclusion. First my review has found that it would have been appropriate for BMI to compare its monitored values to the "Maximum Concentration of Constituents for Ground-water Protection" values (Table 1 values) found in 40 CFR, Part 264.94, as required in Region 5 guidance on the "Contents of the Equivalency Demonstration", as some of these values differ from established MCL's. If no Table 1 value is given, it would then be appropriate to compare monitored values with the MCLs. In addition, it is impossible to tell if all constituents are truly below EPA benchmarks of Table 1 of MCLs values, because, in many cases, the sample detection limits selected are actually above these benchmark levels.

Second, my review finds that the results obtained from the upgradient well, as an accurate measure of background concentrations, is suspect. Levels of the constituent PERC, an organic chemical is not usually seen as a background contaminant, is elevated above MCLs and above downgradient well samples. This is quite possibly an indication that there is a localized source of PERC near the upgradient well location- and yet this is not addressed by BMI. Second, levels of the metals Zinc and Nickel, are monitored at level 2 to 3 orders of magnitude higher in the upgradient well, than the levels found in the downgradient wells. Given the close relative proximity of the wells, one would expect to see some representation of the "background", upgradient concentration in the downgradient wells as well. This is not the case.

Since these issues were not addressed by BMI in the assessment, I cannot conclude that the MW-1 well adequately represents background concentrations. As a result, until these issues are addressed, MW-1 at this time should not be used to eliminate constituents that are above EPA benchmarks values, as BMI has done. Therefore as I review the data in Table 2, I have relied solely on established EPA groundwater protection benchmarks (MCLs, Table 1 values) to make a risk or "acceptability" determination.

Also, in my review, I have used the EPA's Office of Water May 1995 version of the "Drinking Water Regulations and Health

Advisories" even though there is a February 1996 version available--May 1995 would have been the version BMI had access to while preparing this report.

Review of Table 2 Data for Groundwater

ORGANICS

For organics, most constituents downgradient values, presented in Table 2, were below a final or current MCL value.

There were two exceptions which I will address in detail below, Tetrachloroethene (PERC) and Methylene Chloride.

Also, as a point of technical clarification, BMI has indicated that Chloroform and Bromodichloromethane do not have an MCL. Actually both chemicals do have a current MCL value of .1 mg/L.

PERC

BMI has stated that PERC was only slightly above MCL's and below the concentrations monitored in the upgradient well, thereby concluding that PERC is not a threat to human health. Basing this conclusion solely on the concentration detected in the upgradient well is not acceptable for the reasons described earlier. Therefore simply put, there are three detections slightly above MCLs, 2 from MW-2 and 1 from MW-4.

Methylene Chloride

BMI should have included Methylene Chloride in it's discussion. All sample detection limits selected for all wells were approximately one order of magnitude higher than the MCL, thereby making it impossible to tell whether the results obtained are above or below the MCL.

INORGANICS (METALS)

As a point of clarification, BMI should have used the regulatory standards provided in Table 1 in place of, or at least in addition to, the MCL as guided in Region 5's "Contents of the Equivalency Demonstration" when appropriate. Of the constituents listed, there are 5 that have Table 1 values. In three cases, Silver, Selenium and Chromium Table 1 values (.05, .01, and .05 mg/L respectively) are lower than the MCL listed by BMI. Lead, incorrectly, is listed as having an MCL of .05. The Table 1 value for lead is .05 mg/L. Cadmium has a table 1 value higher than the MCL (.01).

In BMI's assessment of metals in groundwater, they address Nickel as the only metal of concern because it exceeds its MCL. However, like with PERC, this is dismissed due to a higher monitored values found in the upgradient well.

After review of the data presented in Table 2 of the report, I cannot reach the same conclusion. To be able to adequately draw a conclusion about the human health risk posed by metals in

groundwater, BMI should have addressed 9 of the metals listed (including Nickel) in its assessment. I will address each of these metals individually below.

Cadmium

All downgradient concentrations of Cadmium are below the Table 1 value of .01 mg/L.

Chromium

One-half of the downgradient sample detection limits were set above the Table 1 value for Chromium of .05 mg/L, thereby not allowing for a determination to be made as to whether the samples are above or below the Table 1 value. The other half of the samples were below the Table 1 value.

Copper

Although there is no Table 1 value or MCL, Copper does have an Office of Water Action level of 1.3 mg/L at the tap. All samples listed are well below this level.

Lead

Lead has a Table 1 value of .05 mg/L. BMI has listed an MCL of .05 mg/L, although as of May 1995, no MCL existed. Half of the

samples again are set at detection limits above the Table 1 value. It is therefore impossible to tell if half of the monitored concentration exceed or are below the Table 1 value. The other half of the samples are below the Table 1 value.

Nickel

3 of the downgradient concentrations are slightly above the MCL- Comparison with the upgradient well would not be reliable for the reasons stated earlier.

Zinc

Although there are Table 1 values or MCL for Zinc, the Office of Water does have individual Health Advisories (HA) for Zinc, including an RfD, a Longer-term value, a Drinking Water Equivalent Value (DWEL) and a Lifetime value. All downgradient concentrations are below these HA benchmarks. As with Cadmium and Nickel, the upgradient samples are elevated with respect to the downgradient samples (2-3 orders of magnitude) --this issue needs to be addressed by BMI.

Arsenic

One-half of the samples were taken at a detection limit that is higher than the MCL. Thus it is hard to determine whether the concentrations of these samples are above or below the MCL. All

other samples are below the MCL.

Selenium

One-half of the detection limits are higher than the Table 1 value of .01 mg/L. Therefore half of the samples collected could be above or below the Table 1 value. All other values monitored are below the Table 1 value.

Silver

There is a Table 1 value of .05. BMI lists an MCL of .1. As of May 1995, there is no MCL listed for Silver. Again, half of the detection limits were set above the Table 1 value so no determination can be made. The other values are fine; they do not exceed the Table 1 benchmark.

Groundwater Conclusions

Due to the inadequacies of this assessment (including high detection limits, inadequate background characterization, and poor explanation of results) a strict regulatory interpretation of the data presented in Table 2 can only lead to the conclusion that it is not possible to determine whether groundwater presents a human health risk or not.

However, per your request, I have analyzed the data present to characterize the potential degree of risk to human health that I would expect to exist separate from a strict regulatory framework. I will focus my judgement on the results generated by the downgradient wells only, since these characterize the potential contamination from the surface impoundment. Additionally, the assumptions and caveats made at the beginning of the report will apply here as well.

Overall, from my interpretation of the data and available EPA guidance and benchmarks, the site as characterized by the downgradient wells do not pose a long-term or acute threat to human health. The basis for this decision is based primarily on data presentation nuisances. For example, the data presented in Table 2 were presented as being below a certain detection limit. A lot of the detection limits were set higher than an EPA benchmark, a definite oversight on BMI's part. However an alternate way to list detection below a certain limit is to present them as one-half of the detection limit. If the data were to be presented in this fashion for organics, only one-half of the samples would exceed the MCL for methylene chloride. For cadmium, chromium, Lead, Arsenic, Selenium and Silver, one-half of the detection limit would put all of these constituents below the MCL or Table 1 value.

In addition, BMI made no attempt to average their results, either by monitoring well, or more appropriately, by collection date. If

you were to average the samples of two chemicals that showed slight elevations above MCLs this way, PERC and Nickel, this resulting value would be below EPA benchmarks.

In summary, taking one-half of the detection limit would mitigate the concern for all chemicals of concern that had detection limits set above EPA benchmarks except for methylene chloride. Methylene Chloride would still have half it's samples above the MCL. Averaging would result in a slight elevation above MCL. However if one were to look at other HA limits provided by the Office of Water in the May 1995 release, all presented values, even at their originally presented values of $<.05$ and $<.01$ mg/L are below such Health Advisories as the Drinking Water Equivalent Level (DWEL) for non-cancer. For cancer risk, a value of $.05$ mg/L results in a cancer risk of 10^{-5} risk. This risk would be less if one-half the detection limit were used.

Clearly, the way BMI has presented the data has not allowed for risk to be adequately addressed; however what this type of data analysis illustrates is that, if the results presented by BMI were presented in a different (and acceptable) way to EPA, most concerns would be mitigated. It also illustrates that the data set does not exceed EPA benchmarks in an extreme fashion--minor presentation nuances, such as these illustrated, would not alter the final risk to human health if the data set did present an extreme risk to human health.

An extra level of safety or conservativeness can be added to the above conclusions by the nature of the groundwater and its use in Perkins Township, OH. According to BMI, the nearest well is 2 miles away. Drinking water for the Perkins Township is also supplied by the City of Sandusky that uses Lake Erie as it's source.

In conclusion, while there appears to be lack of proper assessment and technical inadequacies by BMI, outside of a strict regulatory determination, the actual risks to human health appear to be quite low.

Soil

My review of soil began with the data used to assess risk. After reviewing the text in Section 3-03 and 3-04, Table 3, and the assessment provided in Appendix L of the RED, I could not determine nor reproduce which soil samples listed in Table 3 were used to calculate the mean and 95th Upper confidence level as presented in Appendix L, and later used in the risk assessment. For example:

- Section 3-03A refers to hot spot remediation, but I could not discern if confirmatory samples were taken or not.
- 3-03 C. refers to 32 sample results being entered a database that "represent soil samples collected during and after the removal of impacted materials". This statement does not refer you to which borings these 32 samples represent in

Table 3, or where the database is represented.

Using the data in Table 3 (which can break down into a set of 32), I was unable to reproduce the statistical analysis of these samples presented in Appendix L.

This is point that definitely needs clarification by BMI. In order to continue my review of the assessment, I had to assume the statistical data (of the soil samples) is correctly represented in Appendix L. In addition BMI has seemed to correctly drop organics from the assessment. The following major deficiencies were noted during my review of the BMI risk assessment for soil:

- No statistical analysis of background samples was noted.
- Selenium and Cyanide data were left out of the risk assessment although represented in the statistical summary page in Appendix L. Because all samples of Selenium were below their detection limits (and risk screening levels) it is appropriate to leave Selenium out of the risk assessment. Cyanide, however, should have been included in the risk assessment. Additionally, lead was not included in the risk analysis, evidently because of the lack of an RfD. Lead should have been addressed, however, independently in the assessment. Comparison to an EPA preliminary remediation goals is certainly one benchmark that can be used to assess potential risk. Also BMI omitted a HEAST value for Copper of

3.71 EE-2; thus copper was not included in their risk analysis.

- BMI made no attempt to characterize carcinogenic risk. BMI claims that there were no cancer potency factors established in IRIS or HEAST for the metals of concern. Actually two metals have established potency factors found on IRIS, Cadmium and Arsenic. In the assessment BMI only characterizes non-cancer risk.

- The potential receptors examined by BMI in the risk assessment were an adult worker and child visitor. Ingestion was identified as the only route of exposure. The exposure factors used were selected to create a Reasonable Maximum Exposure (RME) to the identified receptors. The exposure factors that BMI used for these exposure scenarios were correct with two exceptions--adult worker exposure duration should be 25 years instead of 24 years and exposure frequency would be reduced to 250 d/yr.

The selection of this overall exposure scenario, however, does not appear to be consistent with Region 5 Permitting's requirement for Equivalency Demonstrations. This requirement involves characterizing exposure scenarios with regard to a residential future land use. The scenarios applied by BMI has, by default, assumed future land use will remain industrial. No attempt was made by BMI to address or characterize future land

use assumptions. In addition, BMI has not addressed other common routes of exposure associated with metals in soils such as inhalation of fugitive dusts, dermal contact and soil to potable groundwater. These routes need to be addressed (or rationale should be provided for why these pathways would not be of concern)

Soils--Conclusion

* /
After a cursory review, I have found the risk assessment as presented for soils technically deficient and lacking sufficient analysis to be able to arrive at a fully-informed conclusion that this media does not present a human health risk.

However, assuming that the data in Table 3 and subsequent statistical analysis is correct, I was able to summarily analyze the human health risk that may be present given a future residential land use at RME conditions using various soil screening methodologies available to the EPA risk Assessor. I have determined, with such analysis, that the metals in BMI's report, in presented concentrations, do not pose a cancer or non-cancer threat for the exposure pathways of ingestion, inhalation and dermal contact with one exception, Arsenic. Arsenic at it's current concentration of 51 mg/kg did not pass the generic screening value provided by Superfund's Soil Screening Guidance, for the ingestion pathway only. Further risk analysis (using SmartRisk program) of the ingestion route assuming 100% uptake by

the body (arsenic bioavailability when bound in a soil matrix is less than 100%; some studies show it as low as 20-30%), and residential, RME parameters, presents a risk of 5.0×10^{-5} for adults and 1.0×10^{-4} for a child. Both risks drop below 2.0×10^{-5} when 20% bioavailability factor is used. (Note: dermal absorption is not a significant pathway for arsenic relative to ingestion; see Soil Screening Guidance--the inhalation pathway was "screened out") For your information, the risks generated for this analysis are extremely conservative and assume that ingestion of the soil is actually a viable pathway. Note that the soil associated with the impoundment is buried beneath crushed gravel and is currently being used as a driveway. If this site were to become residential property in the future, the gravel would have to be removed and the residually contaminated soil left exposed such that an ingestion scenario for 30 years could occur.

The other common exposure pathway associated with soil is migration to groundwater. To analyze the potential for this pathway to present risk, I have compared concentration levels with generic values present in the Soil Screening Guidance. Three chemicals remain after this analysis, cadmium, mercury and copper. Cadmium with a 95th Upper Confidence Level concentration of 13 mg/kg barely exceeds the Soil Screening guidance generic Level of 8 mg/kg with a dilution and attenuation factor of 20.

¹ Personal Communication with Peter Grevatt, Ph.D, USEPA Region 2 and Fax Re: Arsenic Bioavailability, September 26, 1996

Mercury does not have a screening value, but its mean concentration is very within .04 mg/kg of a background mean. Copper in addition does not have a screening number available for this pathway. Groundwater monitoring, I would imagine, may mitigate any concerns raised by the soil to groundwater pathway.

APPENDIX D

Environmental Database Report



The EDR Radius Map with GeoCheck[®]

Bechtel-McLaughlin, Inc.
3612 Milan Road
Sandusky, OH 44870

Inquiry Number: 0881199.1r

November 14, 2002

The Source For Environmental Risk Management Data

3530 Post Road
Southport, Connecticut 06890

Nationwide Customer Service

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

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

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc. (EDR). The report meets the government records search requirements of ASTM Standard Practice for Environmental Site Assessments, E 1527-00. Search distances are per ASTM standard or custom distances requested by the user.

TARGET PROPERTY INFORMATION

ADDRESS

3612 MILAN ROAD
SANDUSKY, OH 44870

COORDINATES

Latitude (North): 41.425200 - 41° 25' 30.7"
Longitude (West): 82.673400 - 82° 40' 24.2"
Universal Transverse Mercator: Zone 17
UTM X (Meters): 360166.5
UTM Y (Meters): 4587098.5

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property: 2441082-D6 SANDUSKY, OH
Source: USGS 7.5 min quad index

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following government records. For more information on this property see page 5 of the attached EDR Radius Map report:

<u>Site</u>	<u>Database(s)</u>	<u>EPA ID</u>
BECHTEL-MCLAUGHLIN INC (SIA) 3612 MILAN ROAD SANDUSKY, OH 44870	FINDS RCRIS-LQG TRIS RCRIS-TSD RAATS DERR CORRACTS CERC-NFRAP	44870BCHTL36
BECHTEL MCLAUGHLIN INC 3612 MILAN RD SANDUSKY, OH 44870	FINDS	000010118548

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the ASTM E 1527-00 search radius around the target property for the following databases:

FEDERAL ASTM STANDARD

NPL..... National Priority List
CERCLIS..... Comprehensive Environmental Response, Compensation, and Liability Information System

EXECUTIVE SUMMARY

ERNS..... Emergency Response Notification System

STATE ASTM STANDARD

SHWS..... Master Sites List
VCP..... Voluntary Action Program Sites

FEDERAL ASTM SUPPLEMENTAL

CONSENT..... Superfund (CERCLA) Consent Decrees
ROD..... Records Of Decision
Delisted NPL..... National Priority List Deletions
HMIRS..... Hazardous Materials Information Reporting System
MLTS..... Material Licensing Tracking System
MINES..... Mines Master Index File
NPL Liens..... Federal Superfund Liens
PADS..... PCB Activity Database System
TSCA..... Toxic Substances Control Act
SSTS..... Section 7 Tracking Systems

EDR PROPRIETARY HISTORICAL DATABASES

Coal Gas..... Former Manufactured Gas (Coal Gas) Sites

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified.

Elevations have been determined from the USGS 1 degree Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. EDR's definition of a site with an elevation equal to the target property includes a tolerance of +/- 10 feet. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property (by more than 10 feet). Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

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

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

FEDERAL ASTM STANDARD

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 09/09/2002 has revealed that there are 14 RCRIS-SQG sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
<i>AHNER FABRICATING AND S M INC</i>	<i>2001 E PERKINS AVE</i>	<i>1/4 - 1/2NE</i>	<i>D10</i>	<i>20</i>
<i>KMART STORE 3281</i>	<i>911 SANDUSKY MALL N</i>	<i>1/4 - 1/2E</i>	<i>14</i>	<i>22</i>
<i>STONECO INC</i>	<i>4203 MILAN RD</i>	<i>1/4 - 1/2S</i>	<i>F17</i>	<i>24</i>

EXECUTIVE SUMMARY

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
KOKOSING MATERIALS INC	4203 MILAN RD	1/4 - 1/2S	F18	24
SEARS SVC CTR 7360	4314 MILAN RD	1/2 - 1 S	G20	25
FIRESTONE	4320 MILAN RD	1/2 - 1 S	G22	25
BP OIL SITE 06674	2801 MILAN	1/2 - 1 NW	K37	33
MEIJER GAS STATION NO 142	4714 MILAN RD	1/2 - 1 SSE	L40	35
MIELKE FURNITURE REPAIR INC	3209 COLUMBUS AVE	1/2 - 1 W	41	35
BP OIL SITE 06660	3704 COLUMBUS	1/2 - 1 SW	M43	36
<u>Lower Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
KASPER TRANSPORTATION	2401 CLEVELAND	1/2 - 1 NNE	28	28
JACKS DELI	2350 CLEVELAND RD	1/2 - 1 NNE	I30	29
MATESIC AUTO MALL	2215 CLEVELAND RD	1/2 - 1 NNE	J33	30
TOYOTA OF SANDUSKY	2206 CLEVELAND	1/2 - 1 NNE	J34	31

STATE ASTM STANDARD

SWF/LF: The Solid Waste Facilities/Landfill Sites records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. The data come from the Ohio Environmental Protection Agency's Licensed Solid Waste Facilities.

A review of the SWF/LF list, as provided by EDR, has revealed that there are 2 SWF/LF sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
CORSO'S FLOWER & GARDEN	3404 MILAN RD	1/4 - 1/2W	E13	22
OHIO VETERANS HOME *	3416 S COLUMBUS AVE	1/2 - 1 WSW	36	32

LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Commerce Division of State Fire Marshal's List of Reported Petroleum Underground Storage Tank Release Incidents.

A review of the LUST list, as provided by EDR, and dated 08/18/2002 has revealed that there are 16 LUST sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
SUNOCO SERVICE STATION #86	3909 MILAN RD	1/4 - 1/2SW	B4	18
K MART #3281	911 SANDUSKY MALL N	1/4 - 1/2S	8	20
UNITED PARCEL SERVICE	2012 E PERKINS AVE	1/4 - 1/2NE	D11	21
S & S REALTY	4315 MILAN RD	1/2 - 1 S	G21	25
FIRESTONE STORE #1552/001651	4320 MILAN RD	1/2 - 1 S	G23	26
GOOFY GOLF	3020 MILAN RD	1/2 - 1 WNW	26	27
OAKLAND CEMETERY	2917 MILAN RD	1/2 - 1 WNW	27	28
OHIO VETERANS HOME *	3416 S COLUMBUS AVE	1/2 - 1 WSW	36	32
BP OIL CO. #06674	2801 MILAN	1/2 - 1 NW	K38	33
OHIO ROAD PAVING CO.	204 E STRUB RD	1/2 - 1 SW	M42	36
BP OIL CO. #06660	3704 COLUMBUS	1/2 - 1 SW	M44	37
<u>Lower Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
KASPER TRANSPORTATION	2401 CLEVELAND	1/2 - 1 NNE	28	28

EXECUTIVE SUMMARY

<u>Lower Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
JACK'S DELI	2350 CLEVELAND RD	1/2 - 1 NNE	I29	29
KAPPER TRANSPORTATION	2401 CLEVELAND RD (W OF	1/2 - 1 NE	31	30
MATESIC AUTO MALL	2215 CLEVELAND RD	1/2 - 1 NNE	J33	30
ERIE COUNTY WASTEWATER STATION	2509 PETERSON LN	1/2 - 1 ENE	35	31

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Commerce Division of State Fire Marshal's Facility File.

A review of the UST list, as provided by EDR, and dated 08/18/2002 has revealed that there are 5 UST sites within approximately 1 mile of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
SUNOCO SERVICE STATION #86	3909 MILAN RD	1/4 - 1/2SW	B4	18
CONVENIENT FOOD MART #739	1917 E PERKINS AVE	1/4 - 1/2NNE	C7	19
BP OIL CO. #06674	2801 MILAN	1/2 - 1 NW	K38	33
MEIJER GAS #142	4702 MILAN RD	1/2 - 1 SSE	L39	34
BP OIL CO. #06660	3704 COLUMBUS	1/2 - 1 SW	M44	37

FEDERAL ASTM SUPPLEMENTAL

FINDS: The Facility Index System contains both facility information and "pointers" to other sources of information that contain more detail. These include: RCRIS; Permit Compliance System (PCS); Aerometric Information Retrieval System (AIRS); 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); Federal Underground Injection Control (FURS); Federal Reporting Data System (FRDS); Surface Impoundments (SIA); TSCA Chemicals in Commerce Information System (CICS); PADS; RCRA-J (medical waste transporters/disposers); TRIS; and TSCA. The source of this database is the U.S. EPA/NTIS.

A review of the FINDS list, as provided by EDR, and dated 06/13/2002 has revealed that there are 9 FINDS sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
KOCOLENE SERVICE STATION NO 86	3909 MILAN RD	1/4 - 1/2SW	B5	19
CONVENIENT FOOD MART NO 739	1917 E PERKINS AVE	1/4 - 1/2NNE	C6	19
AHNER FABRICATING AND S M INC	2001 E PERKINS AVE	1/4 - 1/2NE	D9	20
AHNER FABRICATING AND S M INC	2001 E PERKINS AVE	1/4 - 1/2NE	D10	20
KMART STORE 3281	911 SANDUSKY MALL N	1/4 - 1/2E	14	22
THE WAGNER QUARRIES CO.	4203 MILAN ROAD	1/4 - 1/2S	F16	23
STONECO INC	4203 MILAN RD	1/4 - 1/2S	F17	24
KOKOSING MATERIALS INC	4203 MILAN RD	1/4 - 1/2S	F18	24
STONECO INC	4203 MILAN RD	1/4 - 1/2S	F19	25

EXECUTIVE SUMMARY

STATE OR LOCAL ASTM SUPPLEMENTAL

SPILLS: The Spills Database comes from the Ohio EPA.

A review of the OH Spills list, as provided by EDR, has revealed that there are 6 OH Spills sites within approximately 1 mile of the target property.

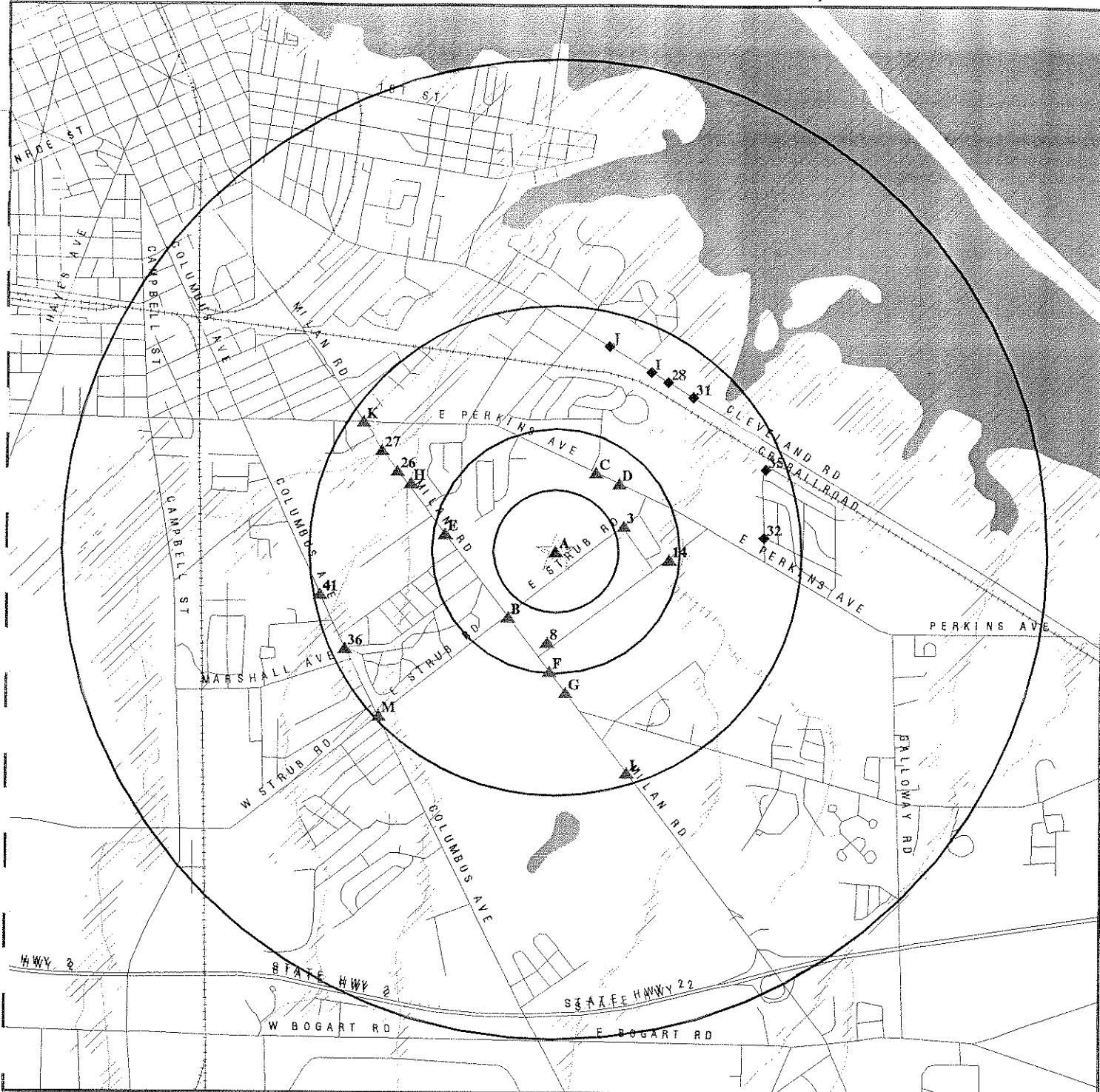
<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
Not reported	1112 E STRUB RD	1/4 - 1/2 ENE	3	17
Not reported	3404 MILAN RD	1/4 - 1/2 W	E12	21
Not reported	4203 MILAN RD	1/4 - 1/2 S	F15	23
Not reported	SR 250 @ PIPE CREEK	1/2 - 1 WNW	H24	26
Not reported	SR 250 / PIPE CREEK	1/2 - 1 WNW	H25	27
<u>Lower Elevation</u>	<u>Address</u>	<u>Dist / Dir</u>	<u>Map ID</u>	<u>Page</u>
Not reported	2910 PETERSON LN	1/2 - 1 E	32	30

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped:

<u>Site Name</u>	<u>Database(s)</u>
UNKNOWN (CITY WATER/SEWER LINE)	LUST
UNKNOWN	LUST
O.E. MEYER CO.	LUST
ODOT HIGHWAY BRIDGE	RCRIS-SQG, FINDS
LOWES OF SANDUSKY #77	RCRIS-SQG, FINDS
MATHEWS FORD SANDUSKY INC	RCRIS-SQG, FINDS
PENSKE AUTO CENTER NO 3281	RCRIS-SQG, FINDS
ERIE COUNTY SCHOOLS	RCRIS-SQG, FINDS
HIGHWAY BRIDGE	FINDS, RCRIS-LQG

OVERVIEW MAP - 0881199.1r - Hull & Associates, 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

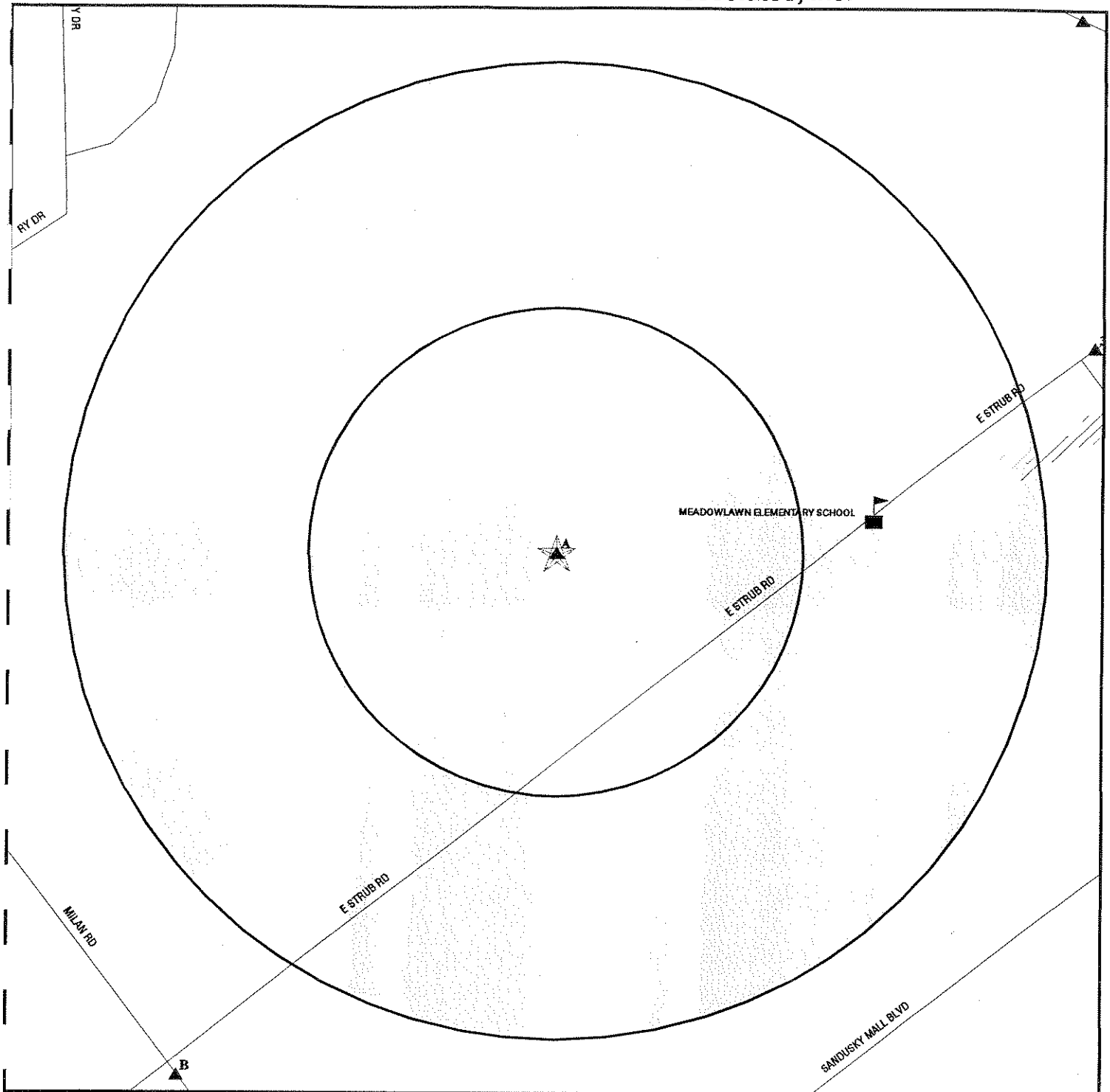
- Power transmission lines
- Oil & Gas pipelines
- ▨ 100-year flood zone
- ▩ 500-year flood zone



TARGET PROPERTY: Bechtel-McLaughlin, Inc.
 ADDRESS: 3612 Milan Road
 CITY/STATE/ZIP: Sandusky OH 44870
 LAT/LONG: 41.4252 / 82.6734

CUSTOMER: Hull & Associates, Inc.
 CONTACT: Karyn Selle
 INQUIRY #: 0881199.1r
 DATE: November 14, 2002 6:47 am

DETAIL MAP - 0881199.1r - Hull & Associates, 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

- ⚡ Power transmission lines
- ⚡ Oil & Gas pipelines
- ▨ 100-year flood zone
- ▨ 500-year flood zone



TARGET PROPERTY: Bechtel-McLaughlin, Inc.
 ADDRESS: 3612 Milan Road
 CITY/STATE/ZIP: Sandusky OH 44870
 LAT/LONG: 41.4252 / 82.6734

CUSTOMER: Hull & Associates, Inc.
 CONTACT: Karyn Selle
 INQUIRY #: 0881199.1r
 DATE: November 14, 2002 6:47 am

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
<u>FEDERAL ASTM STANDARD</u>								
NPL		1.500	0	0	0	0	0	0
CERCLIS		1.000	0	0	0	0	NR	0
CERC-NFRAP	X	0.500	0	0	0	NR	NR	0
CORRACTS	X	1.000	0	0	0	0	NR	0
RCRIS-TSD	X	1.500	0	0	0	0	0	0
RCRIS Lg. Quan. Gen.	X	1.000	0	0	0	0	NR	0
RCRIS Sm. Quan. Gen.		1.000	0	0	4	10	NR	14
ERNS		1.000	0	0	0	0	NR	0
<u>STATE ASTM STANDARD</u>								
State Haz. Waste		1.500	0	0	0	0	0	0
State Landfill		1.000	0	0	1	1	NR	2
LUST		1.000	0	0	3	13	NR	16
UST		1.000	0	0	2	3	NR	5
VCP		0.500	0	0	0	NR	NR	0
<u>FEDERAL ASTM SUPPLEMENTAL</u>								
CONSENT		1.500	0	0	0	0	0	0
ROD		0.500	0	0	0	NR	NR	0
Delisted NPL		0.500	0	0	0	NR	NR	0
FINDS	X	0.500	0	0	9	NR	NR	9
HMIRS		0.500	0	0	0	NR	NR	0
MLTS		0.500	0	0	0	NR	NR	0
MINES		0.500	0	0	0	NR	NR	0
NPL Liens		0.500	0	0	0	NR	NR	0
PADS		0.500	0	0	0	NR	NR	0
RAATS	X	0.500	0	0	0	NR	NR	0
TRIS	X	0.500	0	0	0	NR	NR	0
TSCA		0.500	0	0	0	NR	NR	0
SSTS		TP	NR	NR	NR	NR	NR	0
<u>STATE OR LOCAL ASTM SUPPLEMENTAL</u>								
OH Spills		1.000	0	0	3	3	NR	6
DERR	X	0.500	0	0	0	NR	NR	0
<u>EDR PROPRIETARY HISTORICAL DATABASES</u>								
Coal Gas		1.500	0	0	0	0	0	0
AQUIFLOW - see EDR Physical Setting Source Addendum								

TP = Target Property

NR = Not Requested at this Search Distance

* Sites may be listed in more than one database

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation

MAP FINDINGS

Coal Gas Site Search: No site was found in a search of Real Property Scan's ENVIROHAZ database.

A1	BECHTEL-MCLAUGHLIN INC (SIA)	FINDS	1000244210
Target	3612 MILAN ROAD	RCRIS-LQG	44870BCHTL36
Property	SANDUSKY, OH 44870	TRIS	
		RCRIS-TSD	
		RAATS	
		DERR	
		CORRACTS	
		CERC-NFRAP	

Site 1 of 2 in cluster A

CERCLIS-NFRAP Classification Data:

Site Incident Category: Not reported	Federal Facility: Not a Federal Facility
Non NPL Code: DR	
Ownership Status: Other	NPL Status: Not on the NPL

CERCLIS-NFRAP Assessment History:

Assessment: DISCOVERY	Completed:	09/25/1984
Assessment: PRELIMINARY ASSESSMENT	Completed:	09/25/1985
Assessment: PRELIMINARY ASSESSMENT	Completed:	03/28/1990
Assessment: PRELIMINARY ASSESSMENT	Completed:	04/13/1994
Assessment: ARCHIVE SITE	Completed:	12/27/1995

CORRACTS Data:

EPA Id:	OHD004182614
Region:	5
State:	OH
Area Name:	ENTIRE FACILITY
Original Scheduled Date:	Not reported
New Scheduled Date:	Not reported
Actual Date:	12/11/1987
Corrective Action:	CA050 - RFA Completed

EPA Id:	OHD004182614
Region:	5
State:	OH
Area Name:	ENTIRE FACILITY
Original Scheduled Date:	Not reported
New Scheduled Date:	Not reported
Actual Date:	12/11/1987
Corrective Action:	CA070NO - RFA Determination Of Need For An RFI, RFI is Not Necessary

EPA Id:	OHD004182614
Region:	5
State:	OH
Area Name:	ENTIRE FACILITY
Original Scheduled Date:	Not reported
New Scheduled Date:	Not reported
Actual Date:	03/31/1994
Corrective Action:	CA075LO - CA Prioritization, Facility or area was assigned a low corrective action priority

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

BECHTEL-MCLAUGHLIN INC (SIA) (Continued)

1000244210

RCRIS Corrective Action Summary:

Event: CA Prioritization, Facility or area was assigned a low corrective action priority.
Event Date: 03/31/1994
Event: RFA Completed
Event Date: 12/11/1987
Event: RFA Determination Of Need For An RFI, RFI is Not Necessary;
Event Date: 12/11/1987

RCRIS:

Owner: BECHTEL & MCLAUGHLIN INC
(419) 625-3873
EPA ID: OHD004182614
Contact: JOHN OHLEMACHER
(419) 625-3873

Rank Status: 3
Rank Date: 03/31/1994
Classification: Large Quantity Generator, TSD
Used Oil Recyc: No
TSDF Activities: Not reported

BIENNIAL REPORTS:

Last Biennial Reporting Year: 1999

<u>Waste</u>	<u>Quantity (Lbs)</u>	<u>Waste</u>	<u>Quantity (Lbs)</u>
D002	89241.03	D007	89241.03
D039	743.73		

Violation Status: Violations exist

Regulation Violated: 3745-52-11
Area of Violation: GENERATOR-RECORDKEEPING REQUIREMENTS
Date Violation Determined: 08/21/1998
Actual Date Achieved Compliance: 02/16/1999
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 10/15/1998
Penalty Type: Not reported
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/20/1999
Penalty Type: Not reported
Regulation Violated: 3745-52-11
Area of Violation: GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 07/14/1993
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Not reported
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 06/16/1993
Penalty Type: Not reported
Regulation Violated: 3745-52-34(A)(2)(3)
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 04/02/1993

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

BECHTEL-MCLAUGHLIN INC (SIA) (Continued)

1000244210

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Not reported

Regulation Violated: 3745-65-16(B)(C)(D)(E)
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 04/02/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Not reported

Regulation Violated: 3745-65-33(A)(B)
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 04/01/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Not reported

Regulation Violated: 3745-65-16(A)(4)
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 04/02/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Not reported

Regulation Violated: 3745-65-52(A)
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 04/02/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Not reported

Regulation Violated: 3745-66-71
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 04/01/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Not reported

Regulation Violated: 3745-66-74(B)
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 04/02/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Not reported

Regulation Violated: 3745-59-07(A)(1)
Area of Violation: GENERATOR-LAND BAN REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 06/16/1993

Enforcement Action: WRITTEN INFORMAL

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

BECHTEL-MCLAUGHLIN INC (SIA) (Continued)

1000244210

Enforcement Action Date: 02/05/1993
Penalty Type: Not reported

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 04/02/1993
Penalty Type: Not reported

Regulation Violated: 3745-59-07(A)
Area of Violation: GENERATOR-LAND BAN REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 06/16/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Not reported

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 04/02/1993
Penalty Type: Not reported

Regulation Violated: 3745-66-73(A)
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 06/16/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Not reported

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 04/02/1993
Penalty Type: Not reported

Regulation Violated: 3745-65-52(F)
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 12/28/1992
Actual Date Achieved Compliance: 04/02/1993

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Not reported

Regulation Violated: 40 CFR 270.1
Area of Violation: TSD-CLOSURE/POST-CLOSURE REQUIREMENTS
Date Violation Determined: 04/01/1992
Actual Date Achieved Compliance: 12/22/1998

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 05/24/1988
Penalty Type: Proposed Monetary Penalty

Enforcement Action: INITIAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 07/16/1992
Penalty Type: Proposed Monetary Penalty

Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 12/31/1996
Penalty Type: Proposed Monetary Penalty

Regulation Violated: 3745-66-43
Area of Violation: TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined: 03/26/1991
Actual Date Achieved Compliance: 12/20/1991

Enforcement Action: WRITTEN INFORMAL

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

BECHTEL-MCLAUGHLIN INC (SIA) (Continued)

1000244210

Enforcement Action Date: 04/05/1991
Penalty Type: Not reported

Regulation Violated: Not reported
Area of Violation: TSD-OTHER REQUIREMENTS (OVERSIGHT)
Date Violation Determined: 01/19/1991
Actual Date Achieved Compliance: 12/06/1991

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/24/1991
Penalty Type: Proposed Monetary Penalty

Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 10/13/1992
Penalty Type: Proposed Monetary Penalty

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Proposed Monetary Penalty

Regulation Violated: 3745-65-15(B)(4)
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 01/19/1991
Actual Date Achieved Compliance: 07/03/1991

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/24/1991
Penalty Type: Proposed Monetary Penalty

Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 10/13/1992
Penalty Type: Proposed Monetary Penalty

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Proposed Monetary Penalty

Regulation Violated: 3745-65-52(F)
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 01/19/1991
Actual Date Achieved Compliance: 07/03/1991

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/24/1991
Penalty Type: Proposed Monetary Penalty

Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 10/13/1992
Penalty Type: Proposed Monetary Penalty

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Proposed Monetary Penalty

Regulation Violated: 3745-66-95
Area of Violation: TSD-TANKS REQUIREMENTS
Date Violation Determined: 01/19/1991
Actual Date Achieved Compliance: 12/06/1991

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/24/1991
Penalty Type: Proposed Monetary Penalty

Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 10/13/1992

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

EDR ID Number
EPA ID Number
Database(s)

BECHTEL-MCLAUGHLIN INC (SIA) (Continued)

1000244210

Penalty Type: Proposed Monetary Penalty
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Proposed Monetary Penalty
Regulation Violated: 3745-66-93(A)(3)
Area of Violation: TSD-TANKS REQUIREMENTS
Date Violation Determined: 01/19/1991
Actual Date Achieved Compliance: 12/06/1991
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/24/1991
Penalty Type: Proposed Monetary Penalty
Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 10/13/1992
Penalty Type: Proposed Monetary Penalty
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Proposed Monetary Penalty
Regulation Violated: 3745-66-91(A)(B)
Area of Violation: TSD-TANKS REQUIREMENTS
Date Violation Determined: 01/19/1991
Actual Date Achieved Compliance: 12/06/1991
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/24/1991
Penalty Type: Proposed Monetary Penalty
Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 10/13/1992
Penalty Type: Proposed Monetary Penalty
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Proposed Monetary Penalty
Regulation Violated: 3745-66-71
Area of Violation: TSD-CONTAINERS REQUIREMENTS
Date Violation Determined: 01/19/1991
Actual Date Achieved Compliance: 07/03/1991
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/24/1991
Penalty Type: Proposed Monetary Penalty
Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 10/13/1992
Penalty Type: Proposed Monetary Penalty
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Proposed Monetary Penalty
Regulation Violated: 3745-65-16(A)(B)(C)
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 01/19/1991
Actual Date Achieved Compliance: 07/03/1991
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/24/1991
Penalty Type: Proposed Monetary Penalty

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

BECHTEL-MCLAUGHLIN INC (SIA) (Continued)

1000244210

Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 10/13/1992
Penalty Type: Proposed Monetary Penalty

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Proposed Monetary Penalty

Regulation Violated: 3745-65-14(C)
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 01/19/1991
Actual Date Achieved Compliance: 07/03/1991

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/24/1991
Penalty Type: Proposed Monetary Penalty

Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 10/13/1992
Penalty Type: Proposed Monetary Penalty

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Proposed Monetary Penalty

Regulation Violated: 3745-59-50
Area of Violation: TSD-LAND BAN REQUIREMENTS
Date Violation Determined: 01/19/1991
Actual Date Achieved Compliance: 10/13/1992

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/24/1991
Penalty Type: Proposed Monetary Penalty

Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 10/13/1992
Penalty Type: Proposed Monetary Penalty

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 02/05/1993
Penalty Type: Proposed Monetary Penalty

Regulation Violated: 3745-66-73(A)
Area of Violation: TSD-CONTAINERS REQUIREMENTS
Date Violation Determined: 11/08/1990
Actual Date Achieved Compliance: 06/16/1993

Regulation Violated: 3745-52-10(B);52-34(A)(3)
Area of Violation: GENERATOR-GENERAL REQUIREMENTS
Date Violation Determined: 11/08/1990
Actual Date Achieved Compliance: 07/03/1991

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 09/25/1990
Penalty Type: Not reported

Regulation Violated: 3745-65-31
Area of Violation: TSD-PREPAREDNESS/PREVENTION REQUIREMENTS
Date Violation Determined: 11/08/1990
Actual Date Achieved Compliance: 01/19/1991

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 09/25/1990
Penalty Type: Not reported

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

BECHTEL-MCLAUGHLIN INC (SIA) (Continued)

1000244210

Regulation Violated: 3745-66-71
Area of Violation: TSD-CONTAINERS REQUIREMENTS
Date Violation Determined: 11/08/1990
Actual Date Achieved Compliance: 04/02/1993
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 09/25/1990
Penalty Type: Not reported

Regulation Violated: Not reported
Area of Violation: TSD-OTHER REQUIREMENTS (OVERSIGHT)
Date Violation Determined: 09/19/1990
Actual Date Achieved Compliance: 12/06/1991
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 09/25/1990
Penalty Type: Not reported

Regulation Violated: 40 CFR 268
Area of Violation: GENERATOR-LAND BAN REQUIREMENTS
Date Violation Determined: 02/27/1990
Actual Date Achieved Compliance: 12/06/1991
Regulation Violated: Not reported
Area of Violation: TSD-LAND BAN REQUIREMENTS
Date Violation Determined: 02/27/1990
Actual Date Achieved Compliance: 12/06/1991
Regulation Violated: Not reported
Area of Violation: TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined: 12/12/1989
Actual Date Achieved Compliance: 02/16/1990
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 01/02/1990
Penalty Type: Not reported

Regulation Violated: 3745-52-34
Area of Violation: GENERATOR-PRE-TRANSPORT REQUIREMENTS
Date Violation Determined: 02/28/1989
Actual Date Achieved Compliance: 03/07/1990
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 03/31/1989
Penalty Type: Not reported

Regulation Violated: 3745-66-93(A)(4)
Area of Violation: TSD-TANKS REQUIREMENTS
Date Violation Determined: 02/28/1989
Actual Date Achieved Compliance: 03/07/1990
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 03/31/1989
Penalty Type: Not reported

Regulation Violated: 3745-66-42
Area of Violation: TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined: 02/28/1989
Actual Date Achieved Compliance: 03/07/1990
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 03/31/1989
Penalty Type: Not reported

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

BECHTEL-MCLAUGHLIN INC (SIA) (Continued)

1000244210

Regulation Violated: 3745-66-91(A)
Area of Violation: TSD-TANKS REQUIREMENTS
Date Violation Determined: 02/28/1989
Actual Date Achieved Compliance: 03/07/1990
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 03/31/1989
Penalty Type: Not reported
Regulation Violated: 3745-65-16(B)(C)
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 05/18/1988
Actual Date Achieved Compliance: 09/29/1988
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 05/24/1988
Penalty Type: Proposed Monetary Penalty
Enforcement Action: INITIAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 07/16/1992
Penalty Type: Proposed Monetary Penalty
Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 12/31/1996
Penalty Type: Proposed Monetary Penalty
Regulation Violated: 3745-65-13
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 05/18/1988
Actual Date Achieved Compliance: 09/29/1988
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 05/24/1988
Penalty Type: Not reported
Regulation Violated: 265.191
Area of Violation: TSD-TANKS REQUIREMENTS
Date Violation Determined: 05/18/1988
Actual Date Achieved Compliance: 02/28/1990
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 05/24/1988
Penalty Type: Not reported
Regulation Violated: 3745-66-12
Area of Violation: TSD-CONTINGENCY PLAN REQUIREMENTS
Date Violation Determined: 05/18/1988
Actual Date Achieved Compliance: 09/29/1988
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 05/24/1988
Penalty Type: Not reported
Regulation Violated: 3745-65-16(D)(E)
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 05/18/1988
Actual Date Achieved Compliance: 09/29/1988
Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 05/24/1988
Penalty Type: Not reported
Regulation Violated: Not reported
Area of Violation: TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

BECHTEL-MCLAUGHLIN INC (SIA) (Continued)

1000244210

Date Violation Determined: 05/18/1988
Actual Date Achieved Compliance: 01/12/1989

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 05/18/1988
Penalty Type: Not reported

Enforcement Action: FINAL 3008(A) COMPLIANCE ORDER
Enforcement Action Date: 12/30/1988
Penalty Type: Not reported

Regulation Violated: 3745-65-14
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 11/14/1986
Actual Date Achieved Compliance: 08/28/1987

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 11/21/1986
Penalty Type: Not reported

Regulation Violated: 3745-65-17
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 11/14/1986
Actual Date Achieved Compliance: 08/28/1987

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 11/21/1986
Penalty Type: Not reported

Regulation Violated: 3745-65-13
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 11/14/1986
Actual Date Achieved Compliance: 08/28/1987

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 11/21/1986
Penalty Type: Not reported

Regulation Violated: 3745-65-14(B)(2)(A)(B)
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 06/24/1986
Actual Date Achieved Compliance: 01/09/1987

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 07/24/1986
Penalty Type: Not reported

Regulation Violated: 3745-52-33
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 07/27/1984
Actual Date Achieved Compliance: 04/04/1985

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 08/23/1984
Penalty Type: Not reported

Regulation Violated: 3745-65-14(C)
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 07/27/1984
Actual Date Achieved Compliance: 04/04/1985

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 08/23/1984
Penalty Type: Not reported

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

BECHTEL-MCLAUGHLIN INC (SIA) (Continued)

1000244210

Regulation Violated: 3745-65-15
Area of Violation: TSD-GENERAL STANDARDS
Date Violation Determined: 07/27/1984
Actual Date Achieved Compliance: 04/04/1985

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 08/23/1984
Penalty Type: Not reported

Regulation Violated: 3745-66-47
Area of Violation: TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined: 07/27/1984
Actual Date Achieved Compliance: 04/04/1985

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 08/23/1984
Penalty Type: Not reported

Regulation Violated: 3745-66-47
Area of Violation: TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS
Date Violation Determined: 07/27/1984
Actual Date Achieved Compliance: 04/04/1985

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 08/23/1984
Penalty Type: Not reported

Regulation Violated: 3745-65-51
Area of Violation: TSD-CONTINGENCY PLAN REQUIREMENTS
Date Violation Determined: 05/06/1981
Actual Date Achieved Compliance: 08/03/1982

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 05/12/1981
Penalty Type: Not reported

Regulation Violated: 3745-66-94(B)(3)
Area of Violation: TSD-TANKS REQUIREMENTS
Date Violation Determined: 05/06/1981
Actual Date Achieved Compliance: 08/03/1982

Enforcement Action: WRITTEN INFORMAL
Enforcement Action Date: 05/12/1981
Penalty Type: Not reported

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation

MAP FINDINGS

BECHTEL-MCLAUGHLIN INC (SIA) (Continued)

EDR ID Number
 EPA ID Number

Database(s)

1000244210

There are 54 violation record(s) reported at this site:

<u>Evaluation</u>	<u>Area of Violation</u>	<u>Date of Compliance</u>
Compliance Evaluation Inspection	GENERATOR-RECORDKEEPING REQUIREMENTS	19990216
Other Evaluation	GENERATOR-GENERAL REQUIREMENTS	19930714
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930402
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930402
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930402
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930401
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930402
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930401
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930616
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930402
	GENERATOR-LAND BAN REQUIREMENTS	19930616
	GENERATOR-LAND BAN REQUIREMENTS	19930616
Compliance Evaluation Inspection	TSD-OTHER REQUIREMENTS (OVERSIGHT)	19911206
	TSD-LAND BAN REQUIREMENTS	19921013
	GENERATOR-GENERAL REQUIREMENTS	19930714
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930402
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930402
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930402
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930401
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930402
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930402
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930401
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930616
	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19930402
	GENERATOR-LAND BAN REQUIREMENTS	19930616
	GENERATOR-LAND BAN REQUIREMENTS	19930616
Non-Financial Record Review	TSD-CLOSURE/POST-CLOSURE REQUIREMENTS	19981222
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19911220
Compliance Evaluation Inspection	TSD-OTHER REQUIREMENTS (OVERSIGHT)	19911206
	GENERATOR-GENERAL REQUIREMENTS	19910703
	TSD-GENERAL STANDARDS	19910703
	TSD-GENERAL STANDARDS	19910703
	TSD-GENERAL STANDARDS	19910703
	TSD-GENERAL STANDARDS	19910703
	TSD-CONTAINERS REQUIREMENTS	19910703
	TSD-TANKS REQUIREMENTS	19911206
	TSD-TANKS REQUIREMENTS	19911206
	TSD-TANKS REQUIREMENTS	19911206
Other Evaluation	TSD-LAND BAN REQUIREMENTS	19921013
Compliance Schedule Evaluation	TSD-CONTAINERS REQUIREMENTS	19930616
	TSD-CONTAINERS REQUIREMENTS	19930402
	TSD-PREPAREDNESS/PREVENTION REQUIREMENTS	19910119
	GENERATOR-GENERAL REQUIREMENTS	19910703
Other Evaluation	TSD-OTHER REQUIREMENTS (OVERSIGHT)	19911206
	TSD-CONTAINERS REQUIREMENTS	19930616
	TSD-CONTAINERS REQUIREMENTS	19930402
	TSD-PREPAREDNESS/PREVENTION REQUIREMENTS	19910119
	GENERATOR-GENERAL REQUIREMENTS	19910703
Other Evaluation	GENERATOR-LAND BAN REQUIREMENTS	19911206
	TSD-LAND BAN REQUIREMENTS	19911206
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19900216
Compliance Evaluation Inspection	GENERATOR-PRE-TRANSPORT REQUIREMENTS	19900307

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation

MAP FINDINGS

Site	Database(s)	EDR ID Number EPA ID Number
BECHTEL-MCLAUGHLIN INC (SIA) (Continued)		1000244210
	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19900307
	TSD-TANKS REQUIREMENTS	19900307
	TSD-TANKS REQUIREMENTS	19900307
Compliance Evaluation Inspection	TSD-GENERAL STANDARDS	19880929
	TSD-GENERAL STANDARDS	19880929
	TSD-GENERAL STANDARDS	19880929
	TSD-GENERAL STANDARDS	19880929
	TSD-CONTINGENCY PLAN REQUIREMENTS	19880929
	TSD-TANKS REQUIREMENTS	19900228
Financial Record Review	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19890112
Compliance Evaluation Inspection	TSD-GENERAL STANDARDS	19870828
	TSD-GENERAL STANDARDS	19870828
	TSD-GENERAL STANDARDS	19870828
Compliance Evaluation Inspection	TSD-GENERAL STANDARDS	19870109
Compliance Evaluation Inspection	TSD-GENERAL STANDARDS	19850404
	TSD-GENERAL STANDARDS	19850404
	TSD-GENERAL STANDARDS	19850404
	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19850404
	TSD-FINANCIAL RESPONSIBILITY REQUIREMENTS	19850404
Compliance Evaluation Inspection	TSD-CONTINGENCY PLAN REQUIREMENTS	19820803
	TSD-TANKS REQUIREMENTS	19820803

NY MANIFEST

Additional detail is available in NY MANIFEST. Please contact your EDR Account Executive for more information.

FINDS:

Other Pertinent Environmental Activity Identified at Site:

- AIRS Facility System (AIRS/AFS)
- Enforcement Docket System (DOCKET)
- Facility Registry System (FRS)
- National Compliance Database (NCDB)
- Ohio Core database (OH_CORE)
- Resource Conservation and Recovery Act Information system (RCRAINFO)
- Toxic Chemical Release Inventory System (TRIS)

DERR:

Facility Id: 322-0086
 Lat/Long: Not reported
 EPA ID: OHD004182614
 Voluntary Action Program: False

A2	BECHTEL MCLAUGHLIN INC	FINDS	1005671932
Target	3612 MILAN RD		000010118548
Property	SANDUSKY, OH 44870		

Site 2 of 2 in cluster A

FINDS:

Other Pertinent Environmental Activity Identified at Site:
 Enforcement Docket System (DOCKET)

3	ENE	1112 E STRUB RD	OH Spills	S102889577
1/4-1/2	1546 ft.	PERKINS TWP, OH		N/A
Higher				

Map ID
Direction
Distance
Distance (ft.)
Elevation

MAP FINDINGS

(Continued)

Database(s) EDR ID Number
EPA ID Number

S102889577

SPILLS:

Facility ID: 9206-22-2383
Spill Date: 06/92 Date Reported: 06/08/92 14:25
Spill Number: 9206-22-2383
Size of Spill: Unknown Priority: Respond Immediately
Cause: Valve Opened Reason: Unknown reasons
Affected Area: Land or land surface impact
Material: GASOLINE
Type: Hydrocarbon ie: crude oil, natural gas, gasoline, waste oil
Units: gallons
Affected Area: Post-88 surface water
Material: Not reported
Type: Not reported
Units: Not reported
Waterway Affctd: FARM TILE
Spill Source: Unknown
Reportable Qnty: Not reported
Name of Company or person that had spill:
RICHARD E STANLEY BUILDER
1112 E STRUB RD
SANDUSKY, OH 44870
Suspected Spiller: Not reported
Carrier: Not reported

B4
SW
1/4-1/2
1740 ft.
Higher

SUNOCO SERVICE STATION #86
3909 MILAN RD
SANDUSKY, OH 44870
Site 1 of 2 in cluster B

LUST U000891193
UST N/A

LUST:

Owner: RAYMON MITCHELL
Facility Status: Inactive
LTF Status: 1 SUS/CON from regulated UST
Release Number: 22000117-N00001
Owner Address: 1725 E TIPTON ST
SEYMOUR, IN 47274
FR Status: No Further Action letter issued
Old Facility Id: 220117
Former LUST Release Number: 22977000
Release Date: Not reported

UST:

Facility ID: 22000117 Tank ID: T00001
Owner: KOCOLENE MARKETING LLC
Owner Address: 1725 E TIPTON ST
SEYMOUR, IN 47274
Capacity: 10152 Tank Status: Currently In Use
Install Date: 01/01/1971
Content: Gasoline
Tank Type: Steel

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
 EPA ID Number

SUNOCO SERVICE STATION #86 (Continued)

U000891193

Facility ID:	22000117	Tank ID:	T00002
Owner:	KOCOLENE MARKETING LLC		
Owner Address:	1725 E TIPTON ST SEYMOUR, IN 47274		
Capacity:	10152	Tank Status:	Currently In Use
Install Date:	01/01/1971		
Content:	Gasoline		
Tank Type:	Steel		
Facility ID:	22000117	Tank ID:	T00003
Owner:	KOCOLENE MARKETING LLC		
Owner Address:	1725 E TIPTON ST SEYMOUR, IN 47274		
Capacity:	10152	Tank Status:	Currently In Use
Install Date:	01/01/1971		
Content:	Gasoline		
Tank Type:	Steel		

B5
 SW
 1/4-1/2
 1740 ft.
 Higher

KOCOLENE SERVICE STATION NO 86
 3909 MILAN RD
 SANDUSKY, OH 44870
 Site 2 of 2 in cluster B

FINDS 1005808947
 000011847394

FINDS:
 Other Pertinent Environmental Activity Identified at Site:
 Facility Registry System (FRS)
 Ohio Core database (OH_CORE)

C6
 NNE
 1/4-1/2
 1903 ft.
 Higher

CONVENIENT FOOD MART NO 739
 1917 E PERKINS AVE
 SANDUSKY, OH 44870
 Site 1 of 2 in cluster C

FINDS 1005799552
 000011748922

FINDS:
 Other Pertinent Environmental Activity Identified at Site:
 Facility Registry System (FRS)
 Ohio Core database (OH_CORE)

C7
 NNE
 1/4-1/2
 1903 ft.
 Higher

CONVENIENT FOOD MART #739
 1917 E PERKINS AVE
 SANDUSKY, OH 44870
 Site 2 of 2 in cluster C

UST U000696031
 N/A

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

CONVENIENT FOOD MART #739 (Continued)

U000696031

UST:

Facility ID: 22000269 Tank ID: T00001
Owner: CONSUN FOOD INDUSTRIES, INC.
Owner Address: 123 N GATEWAY BLVD
ELYRIA, OH 44035
Capacity: 10000 Tank Status: Currently In Use
Install Date: 09/01/1988
Content: Gasoline
Tank Type: Fiberglass Reinforced Plastic
Facility ID: 22000269 Tank ID: T00002
Owner: CONSUN FOOD INDUSTRIES, INC.
Owner Address: 123 N GATEWAY BLVD
ELYRIA, OH 44035
Capacity: 10000 Tank Status: Currently In Use
Install Date: 09/01/1988
Content: Gasoline
Tank Type: Fiberglass Reinforced Plastic

8
South
1/4-1/2
1968 ft.
Higher

K MART #3281
911 SANDUSKY MALL N
SANDUSKY, OH 44870

LUST S104775919
N/A

LUST:

Owner: KMART CORP.
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 22000044-N00001
Owner Address: 3100 W BIG BEAVER RD
TROY, MI 48084
FR Status: No Further Action letter issued
Old Facility Id: 220044
Former LUST Release Number: 223092900
Release Date: Not reported

D9
NE
1/4-1/2
1987 ft.
Higher

AHNER FABRICATING AND S M INC
2001 E PERKINS AVE
SANDUSKY, OH 44870

FINDS 1005729985
000010780672

Site 1 of 3 in cluster D

D10
NE
1/4-1/2
1987 ft.
Higher

AHNER FABRICATING AND S M INC
2001 E PERKINS AVE
SANDUSKY, OH 44870

RCRIS-SQG 1004763093
FINDS OH0000008458

Site 2 of 3 in cluster D

MAP FINDINGS

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation

Site

Database(s)

EDR ID Number
 EPA ID Number

AHNER FABRICATING AND S M INC (Continued)

1004763093

RCRIS:

Owner: AHNER DANIEL
 (419) 746-2221
 EPA ID: OH000008458
 Contact: TIMOTHY AHNER
 (419) 626-6641

Classification: Conditionally Exempt Small Quantity Generator
 Used Oil Recyc: No
 TSD Activities: Not reported
 Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
 Facility Registry System (FRS)
 Resource Conservation and Recovery Act Information system (RCRAINFO)

D11
 NE
 1/4-1/2
 2011 ft.
 Higher

**UNITED PARCEL SERVICE
 2012 E PERKINS AVE
 SANDUSKY, OH 44870**

LUST S104775953
 N/A

Site 3 of 3 in cluster D

LUST:

Owner: NICOLE PESA
 Facility Status: Inactive
 LTF Status: 6 Closure of regulated UST
 Release Number: 22007313-N00001
 Owner Address: 2450 RATHMELL RD
 OBETZ, OH 43207
 FR Status: No Further Action letter issued
 Old Facility Id: 227313
 Former LUST Release Number: 220165100
 Release Date: Not reported

E12
 West
 1/4-1/2
 2393 ft.
 Higher

**3404 MILAN RD
 SANDUSKY, OH**

OH Spills S101561462
 N/A

Site 1 of 2 in cluster E

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation

MAP FINDINGS

EDR ID Number
 EPA ID Number

(Continued)

S101561462

SPILLS:

Facility ID: 9206-22-2642
 Spill Date: 06/92 Date Reported: 06/22/92 19:00
 Spill Number: 9206-22-2642
 Size of Spill: Small Priority: No Response by Emergency Response
 Cause: Leak Reason: Human error
 Affected Area: Post-88 surface water
 Material: DIESEL FUEL
 Type: Hydrocarbon ie: crude oil, natural gas, gasoline, waste oil
 Units: gallons
 Waterway Affctd: STORM SEWER
 Spill Source: Transportation, Truck, Unloading/loading equipment
 Reportable Qnty: Not reported
 Name of Company or person that had spill:
 CORSOS
 3404 MILAN RD
 SANDUSKY, OH
 Suspected Spiller: Not reported
 Carrier: Not reported

E13
 West
 1/4-1/2
 2393 ft.
 Higher

CORSO'S FLOWER & GARDEN
 3404 MILAN RD
 SANDUSKY, OH 44870
 Site 2 of 2 in cluster E

SWF/LF S105245322
 N/A

LF:

Facility ID: 22-C4R-01 Status: Not reported
 Type: Registered Class III and Class IV Composting Facilities
 Closed Facility: Not reported
 Class: Not reported Captive: No
 SWMD: Not reported Registration #: 54380
 Operator: Not reported
 Operator Addr: Not reported
 Operator Phone: Not reported
 Owner: Not reported
 Owner Addr: Not reported
 Licence Holder: Not reported
 LH Addr: Not reported
 Last Update: Not reported
 License Expires: Not reported

14
 East
 1/4-1/2
 2415 ft.
 Higher

KMART STORE 3281
 911 SANDUSKY MALL N
 SANDUSKY, OH 44870

RCRIS-SQG 1000156213
 FINDS OHD137366688

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation

MAP FINDINGS

KMART STORE 3281 (Continued)

EDR ID Number
 EPA ID Number

Database(s)

1000156213

RCRIS:

Owner: KMART CORP
 (312) 555-1212
 EPA ID: OHD137366688
 Contact: MANAGER STORE
 (419) 625-6061
 Classification: Small Quantity Generator
 Used Oil Recyc: No
 TSDF Activities: Not reported
 Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
 Facility Registry System (FRS)
 Resource Conservation and Recovery Act Information system (RCRAINFO)

F15
 South
 1/4-1/2
 2594 ft.
 Higher

4203 MILAN RD
 SANDUSKY, OH

OH Spills S102478173
 N/A

Site 1 of 5 in cluster F

SPILLS:

Facility ID:	19968--3534	Date Reported	08/12/96 14:57
Spill Date:	8/1996	Priority:	Respond When Possible or Convenient
Spill Number:	9608-22-3534	Reason:	Undefined
Size of Spill:	Small		
Cause:	Cut or Break		
Affected Area:	Land or land surface impact		
Material:	USED OIL		
Type:	Hydrocarbon ie: crude oil, natural gas, gasoline, waste oil		
Units:	Not reported		
Waterway Affctd:	Not reported		
Spill Source:	Transportation, Truck, Line leak		
Reportable Qnty:	Not reported		
Name of Company or person that had spill:	Not reported		
Suspected Spiller:	WHAGNER QUARRY 4203 MILAN RD SANDUSKY, OH 44870		
Carrier:	Not reported		

F16
 South
 1/4-1/2
 2594 ft.
 Higher

THE WAGNER QUARRIES CO.
 4203 MILAN ROAD
 SANDUSKY, OH 44870

FINDS 1005536145
 000008040958

Site 2 of 5 in cluster F

MAP FINDINGS

Map ID
Direction
Distance
Distance (ft.)
Elevation

Site

Database(s)

EDR ID Number
EPA ID Number

THE WAGNER QUARRIES CO. (Continued)

1005536145

FINDS:

Other Pertinent Environmental Activity Identified at Site:
Ohio Core database (OH_CORE)
Permit Compliance System (PCS)

F17
South
1/4-1/2
2594 ft.
Higher

STONECO INC
4203 MILAN RD
SANDUSKY, OH 44870

RCRIS-SQG 1004766926
FINDS OHR000022368

Site 3 of 5 in cluster F

RCRIS:

Owner: SE JOHNSON COS INC
(419) 843-8731
EPA ID: OHR000022368
Contact: JASON LOWERY
(419) 893-8731

Classification: Conditionally Exempt Small Quantity Generator
Used Oil Recyc: No
TSDf Activities: Not reported
Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Resource Conservation and Recovery Act Information system (RCRAINFO)

F18
South
1/4-1/2
2594 ft.
Higher

KOKOSING MATERIALS INC
4203 MILAN RD
SANDUSKY, OH 44870

RCRIS-SQG 1001203265
FINDS OHR000024497

Site 4 of 5 in cluster F

RCRIS:

Owner: HANNAH LOCKNER
(419) 625-8141
EPA ID: OHR000024497
Contact: TRENT BALDWIN
(614) 694-1634

Classification: Small Quantity Generator
Used Oil Recyc: No
TSDf Activities: Not reported
Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
Ohio Core database (OH_CORE)
Resource Conservation and Recovery Act Information system (RCRAINFO)

MAP FINDINGS

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation

Site

Database(s)

EDR ID Number
 EPA ID Number

F19
 South
 1/4-1/2
 2594 ft.
 Higher

STONECO INC
 4203 MILAN RD
 SANDUSKY, OH 44870

Site 5 of 5 in cluster F

FINDS 1005772710
 000011254656

G20
 South
 1/2-1
 3059 ft.
 Higher

SEARS SVC CTR 7360
 4314 MILAN RD
 SANDUSKY, OH 44870

Site 1 of 4 in cluster G

RCRIS-SQG 1004767584
FINDS OHR000041335

RCRIS:
 Owner: SEARS ROEBUCK CO
 (419) 626-6815
 EPA ID: OHR000041335
 Contact: REBECCA MEIER
 (419) 626-6815
 Classification: Small Quantity Generator
 Used Oil Recyc: No
 TSDF Activities: Not reported
 Violation Status: No violations found

FINDS:
 Other Pertinent Environmental Activity Identified at Site:
 Facility Registry System (FRS)
 Resource Conservation and Recovery Act Information system (RCRAINFO)

G21
 South
 1/2-1
 3059 ft.
 Higher

S & S REALTY
 4315 MILAN RD
 SANDUSKY, OH 44870

Site 2 of 4 in cluster G

LUST S104775955
 N/A

LUST:
 Owner: CC&S REST, INC.
 Facility Status: Inactive
 LTF Status: 6 Closure of regulated UST
 Release Number: 22008027-N00001
 Owner Address: 4315 MILAN RD
 SANDUSKY, OH 44870
 FR Status: No Further Action letter issued
 Old Facility Id: 228027
 Former LUST Release Number: 225113300
 Release Date: Not reported

G22
 South
 1/2-1
 3084 ft.
 Higher

FIRESTONE
 4320 MILAN RD
 SANDUSKY, OH 44870

Site 3 of 4 in cluster G

RCRIS-SQG 1004763270
FINDS OH0000443879

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation

MAP FINDINGS

FIRESTONE (Continued)

EDR ID Number
 EPA ID Number

Database(s)

1004763270

RCRIS:

Owner: BRIDGESTONE/FIRESTONE INC
 (708) 981-2391
 EPA ID: OH0000443879
 Contact: ED DOYLE
 (303) 427-4567

Classification: Conditionally Exempt Small Quantity Generator
 Used Oil Recyc: No
 TSDF Activities: Not reported
 Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
 Facility Registry System (FRS)
 Resource Conservation and Recovery Act Information system (RCRAINFO)

G23
 South
 1/2-1
 3084 ft.
 Higher

FIRESTONE STORE #1552/001651
 4320 MILAN RD
 SANDUSKY, OH 44870
 Site 4 of 4 in cluster G

LUST S104775917
 N/A

LUST:

Owner: BRIDGESTONE\FIRESTONE, INC
 Facility Status: Inactive
 LTF Status: 1 SUS/CON from regulated UST
 Release Number: 22000034-N00001
 Owner Address: 2550 W GOLF RD ATTN:DEBRA J HAMLIN,REP
 ROLLING MEADOWS, IL 60008
 FR Status: No Further Action letter issued
 Old Facility Id: 220034
 Former Lust Release Number: 224064900
 Release Date: Not reported

H24
 WNW
 1/2-1
 3436 ft.
 Higher

SR 250 @ PIPE CREEK
 SANDUSKY, OH
 Site 1 of 2 in cluster H

OH Spills S102893796
 N/A

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
 EPA ID Number

(Continued)

S102893796

SPILLS:

Facility ID: 9307-22-2896
 Spill Date: 07/93 Date Reported 07/13/93 14:18
 Spill Number: 9307-22-2896
 Size of Spill: Medium Priority: Respond When Possible or Convenient
 Cause: Valve Opened Reason: Unknown reasons
 Affected Area: Land or land surface impact
 Material: SSI SEALER
 Type: Hydrocarbon ie: crude oil, natural gas, gasoline, waste oil
 Units: gallons
 Affected Area: Post-88 surface water
 Material: Not reported
 Type: Not reported
 Units: Not reported
 Waterway Affctd: PIPE CREEK
 Spill Source: Fixed Facility, Government, K-culvert, manhole, or outfall
 Reportable Qnty: Not reported
 Name of Company or person that had spill:
 ERIE COUNTY HIGHWAY DEPT
 2700 COLUMBUS AVE
 SANDUSKY, OH 44870
 Suspected Spiller: Not reported
 Carrier: Not reported

H25
 WNW
 1/2-1
 3436 ft.
 Higher

SR 250 / PIPE CREEK
 SANDUSKY, OH

OH Spills S102894328
 N/A

Site 2 of 2 in cluster H

SPILLS:

Facility ID: 9310-22-4285
 Spill Date: 10/93 Date Reported 10/15/93 17:48
 Spill Number: 9310-22-4285
 Size of Spill: Small Priority: Respond When Possible or Convenient
 Cause: Valve Opened Reason: Unknown reasons
 Affected Area: Post-88 surface water
 Material: GASOLINE
 Type: Hydrocarbon ie: crude oil, natural gas, gasoline, waste oil
 Units: gallons
 Waterway Affctd: PIPE CREEK
 Spill Source: Unknown
 Reportable Qnty: Not reported
 Name of Company or person that had spill:
 UNKNOWN
 Suspected Spiller: Not reported
 Carrier: Not reported

26
 WNW
 1/2-1
 3812 ft.
 Higher

GOOFY GOLF
 3020 MILAN RD
 PERKINS TWP, OH 44870

LUST S104265880
 N/A

Map ID
Direction
Distance
Distance (ft.)
Elevation

MAP FINDINGS

EDR ID Number
EPA ID Number

GOOFY GOLF (Continued)

S104265880

LUST:
Owner: GOOFY GOLF
Facility Status: Active
LTF Status: 6 Closure of regulated UST
Release Number: 22009461-N00001
Owner Address: 3020 MILAN RD
PERKINS TWP, OH 44870
FR Status: A possible incident is reported
Old Facility Id: 229461
Former Lust Release Number: 220007500
Release Date: Not reported

27
WNW
1/2-1
4322 ft.
Higher

OAKLAND CEMETERY
2917 MILAN RD
SANDUSKY, OH 44870

LUST S101561412
N/A

LUST:
Owner: OAKLAND CEMETERY
Facility Status: Inactive
LTF Status: 1 SUS/CON from regulated UST
Release Number: 22009958-N00001
Owner Address: 2917 MILAN RD
SANDUSKY, OH 44870
FR Status: No Further Action letter issued
Old Facility Id: Not reported
Former Lust Release Number: 220078700
Release Date: Not reported

28
NNE
1/2-1
4358 ft.
Lower

KASPER TRANSPORTATION
2401 CLEVELAND
SANDUSKY, OH 44870

RCRIS-SQG 1000346138
FINDS OHD018298695
LUST

RCRIS:
Owner: KASPER GERRY
(312) 555-1212
EPA ID: OHD018298695
Contact: GENE TAYLOR
(419) 625-8035
Classification: Small Quantity Generator
Used Oil Recyc: No
TSDF Activities: Not reported
Violation Status: No violations found

NY MANIFEST

Additional detail is available in NY MANIFEST. Please contact your EDR Account Executive for more information.

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

KASPER TRANSPORTATION (Continued)

1000346138

FINDS:

Other Pertinent Environmental Activity Identified at Site:

Facility Registry System (FRS)

Ohio Core database (OH_CORE)

Resource Conservation and Recovery Act Information system (RCRAINFO)

LUST:

Owner: KASPER TRANSPORTATION

Facility Status: Inactive

LTF Status: 6 Closure of regulated UST

Release Number: 22010030-N00001

Owner Address: 2401 CLEVELAND RD (N OF BLDG)

SANDUSKY, OH 44870

FR Status: No Further Action letter issued

Old Facility Id: Not reported

Former LUST Release Number: 221110801

Release Date: Not reported

I29
NNE
1/2-1
4364 ft.
Lower

JACK'S DELI
2350 CLEVELAND RD
SANDUSKY, OH 44870

LUST S104775916
N/A

Site 1 of 2 in cluster I

LUST:

Owner: JACKS DELI

Facility Status: Active

LTF Status: 6 Closure of regulated UST

Release Number: 22000031-N00001

Owner Address: 2350 CLEVELAND RD

SANDUSKY, OH 44870

FR Status: Deficiency

Old Facility Id: 220031

Former LUST Release Number: 229090000

Release Date: Not reported

I30
NNE
1/2-1
4364 ft.
Lower

JACKS DELI
2350 CLEVELAND RD
SANDUSKY, OH 44870

RCRIS-SQG 1004767446
FINDS OHR000038331

Site 2 of 2 in cluster I

RCRIS:

Owner: JAMIE PIRBANIC
(419) 626-6656

EPA ID: OHR000038331

Contact: JAMIE PIRBANIC
(419) 626-6656

Classification: Conditionally Exempt Small Quantity Generator

Used Oil Recyc: No

TSDF Activities: Not reported

Map ID
Direction
Distance
Distance (ft.)
Elevation

MAP FINDINGS

JACKS DELI (Continued)

Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:

Facility Registry System (FRS)

Resource Conservation and Recovery Act Information system (RCRAINFO)

Database(s) EDR ID Number
EPA ID Number

1004767446

31
NE
1/2-1
4431 ft.
Lower

KAPPER TRANSPORTATION
2401 CLEVELAND RD (W OF BLDG)
SANDUSKY, OH 44870

LUST S104265901
N/A

LUST:

Owner: KAPPER TRANSPORTATION
Facility Status: Inactive
LTF Status: 1 SUS/CON from regulated UST
Release Number: 22010043-N00001
Owner Address: 2401 CLEVELAND RD (W OF BLDG)
SANDUSKY, OH 44870
FR Status: No Further Action letter issued
Old Facility Id: Not reported
Former LUST Release Number: 221110802
Release Date: Not reported

32
East
1/2-1
4478 ft.
Lower

2910 PETERSON LN
SANDUSKY, OH

OH Spills S102893236
N/A

SPILLS:

Facility ID: 9304-22-1503
Spill Date: 04/93 Date Reported: 04/23/93 04:45
Spill Number: 9304-22-1503
Size of Spill: Unknown Priority: No Response by Emergency Response
Cause: Valve Opened Reason: Unknown reasons
Affected Area: Air
Material: ODORS
Type: Air contaminants, odors, smoke, not specific chemicals
Units: unknown
Waterway Affctd: Not reported
Spill Source: Unknown
Reportable Qnty: Not reported
Name of Company or person that had spill:
UNKNOWN
Suspected Spiller: Not reported
Carrier: Not reported

J33
NNE
1/2-1
4535 ft.
Lower

MATESIC AUTO MALL
2215 CLEVELAND RD
SANDUSKY, OH 44870

RCRIS-SQG 1000222072
FINDS OHD093275659
LUST

Site 1 of 2 in cluster J

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation

MAP FINDINGS

Site	Database(s)	EDR ID Number EPA ID Number
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MATESIC AUTO MALL (Continued)

1000222072

RCRIS:

Owner: MATESIC THOMAS
 (312) 555-1212
 EPA ID: OHD093275659
 Contact: WILLIAM FIEN
 (419) 627-8855

Classification: Small Quantity Generator
 Used Oil Recyc: No
 TSDf Activities: Not reported

Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
 Facility Registry System (FRS)
 Resource Conservation and Recovery Act Information system (RCRAINFO)

LUST:

Owner: MATESIC AUTO MALL
 Facility Status: Inactive
 LTF Status: 1 SUS/CON from regulated UST
 Release Number: 22009974-N00001
 Owner Address: 2215 CLEVELAND RD
 SANDUSKY, OH 44870
 FR Status: No Further Action letter issued
 Old Facility Id: Not reported
 Former LUST Release Number: 220298000
 Release Date: Not reported

J34
 NNE
 1/2-1
 4555 ft.
 Lower

TOYOTA OF SANDUSKY
2206 CLEVELAND
SANDUSKY, OH 44870

RCRIS-SQG 1000562754
 FINDS OHD987036415

Site 2 of 2 in cluster J

RCRIS:

Owner: ABRAHAM NICHOLAS M
 (216) 988-7504
 EPA ID: OHD987036415
 Contact: JOHN KRAWCHECK
 (419) 621-0210

Classification: Small Quantity Generator
 Used Oil Recyc: No
 TSDf Activities: Not reported

Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
 Facility Registry System (FRS)
 Resource Conservation and Recovery Act Information system (RCRAINFO)

35
 ENE
 1/2-1
 4843 ft.
 Lower

ERIE COUNTY WASTEWATER STATION
2509 PETERSON LN
SANDUSKY, OH 44870

LUST S104775951
 N/A

Map ID
Direction
Distance
Distance (ft.)
Elevation

MAP FINDINGS

ERIE COUNTY WASTEWATER STATION (Continued)

Database(s) EDR ID Number
EPA ID Number

S104775951

LUST:

Owner: BOB SENNISH
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 22005987-N00001
Owner Address: PO BOX 1180 2900 COLUMBUS AVE
SANDUSKY, OH 44870
FR Status: No Further Action letter issued
Old Facility Id: 225987
Former Lust Release Number: 222274400
Release Date: Not reported

36
WSW
1/2-1
4975 ft.
Higher

OHIO VETERANS HOME *
3416 S COLUMBUS AVE
SANDUSKY, OH 44870

LUST S105245324
SWF/LF N/A

LUST:

Owner: OHIO VETERANS HOME
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 22009835-N00001
Owner Address: 3416 S COLUMBUS AVE
SANDUSKY, OH 44870
FR Status: No Further Action letter issued
Old Facility Id: 229835
Former Lust Release Number: Not reported
Release Date: 4/22/02 0:00

Owner: OHIO VETERANS HOME
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 22009835-N00002
Owner Address: 3416 S COLUMBUS AVE
SANDUSKY, OH 44870
FR Status: No Further Action letter issued
Old Facility Id: 229835
Former Lust Release Number: Not reported
Release Date: 4/22/02 0:00

LF:

Facility ID: 22-C4R-05 Status: Not reported
Type: Registered Class III and Class IV Composting Facilities
Closed Facility: Not reported
Class: Not reported Captive: No
SWMD: Not reported Registration #: 54612
Operator: Not reported
Operator Addr: Not reported
Operator Phone: Not reported
Owner: Not reported
Owner Addr: Not reported
Licence Holder: Not reported
LH Addr: Not reported
Last Update: Not reported
License Expires: Not reported

MAP FINDINGS

Map ID
Direction
Distance
Distance (ft.)
Elevation

Site

Database(s) EDR ID Number
EPA ID Number

K37 **BP OIL SITE 06674**
NW **2801 MILAN**
1/2-1 **SANDUSKY, OH 44870**
4993 ft.
Higher **Site 1 of 2 in cluster K**

RCRIS-SQG **1004765278**
FINDS **OHD987020112**

RCRIS:

Owner: BP OIL COMPANY
 (216) 586-5398
EPA ID: OHD987020112
Contact: PETE PAONESSA
 (216) 271-8739

Classification: Conditionally Exempt Small Quantity Generator
Used Oil Recyc: No
TSDF Activities: Not reported
Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
 Facility Registry System (FRS)
 Ohio Core database (OH_CORE)
 Resource Conservation and Recovery Act Information system (RCRAINFO)

K38 **BP OIL CO. #06674**
NW **2801 MILAN**
1/2-1 **SANDUSKY, OH 44870**
4993 ft.
Higher **Site 2 of 2 in cluster K**

LUST **1000561214**
UST **N/A**

LUST:

Owner: COLES ENERGY, INC.
Facility Status: Active
LTF Status: 1 SUS/CON from regulated UST
Release Number: 22000264-N00001
Owner Address: 3619 ST RT 113 EAST
 MILAN, OH 44846
FR Status: Tier 1
Old Facility Id: 220264
Former LUST Release Number: Not reported
Release Date: 6/2/00 0:00

UST:

Facility ID:	22000264	Tank ID:	T00001
Owner:	COLES ENERGY, INC.		
Owner Address:	3619 ST RT 113 EAST MILAN, OH 44846		
Capacity:	10000	Tank Status:	Currently In Use
Install Date:	01/01/1982		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic		

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation

MAP FINDINGS

BP OIL CO. #06674 (Continued)

EDR ID Number
 EPA ID Number

Database(s)

1000561214

Facility ID:	22000264	Tank ID:	T00002
Owner:	COLES ENERGY, INC.		
Owner Address:	3619 ST RT 113 EAST MILAN, OH 44846		
Capacity:	10000	Tank Status:	Currently In Use
Install Date:	01/01/1982		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic		
Facility ID:	22000264	Tank ID:	T00003
Owner:	COLES ENERGY, INC.		
Owner Address:	3619 ST RT 113 EAST MILAN, OH 44846		
Capacity:	10000	Tank Status:	Currently In Use
Install Date:	01/01/1982		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic		

L39
 SSE
 1/2-1
 5018 ft.
 Higher

MEIJER GAS #142
4702 MILAN RD
SANDUSKY, OH 44870

UST U002264707
 N/A

Site 1 of 2 in cluster L

UST:

Facility ID:	22001415	Tank ID:	T00001
Owner:	MEIJER, STORES LIMITED PARTNERSH		
Owner Address:	2929 WALKER AVE NW GRAND RAPIDS, MI 49544		
Capacity:	15000	Tank Status:	Currently In Use
Install Date:	05/01/1995		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic;Double Walled (Int		
Facility ID:	22001415	Tank ID:	T00002
Owner:	MEIJER, STORES LIMITED PARTNERSH		
Owner Address:	2929 WALKER AVE NW GRAND RAPIDS, MI 49544		
Capacity:	12000	Tank Status:	Currently In Use
Install Date:	05/01/1995		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic;Double Walled (Int		
Facility ID:	22001415	Tank ID:	T00003
Owner:	MEIJER, STORES LIMITED PARTNERSH		
Owner Address:	2929 WALKER AVE NW GRAND RAPIDS, MI 49544		
Capacity:	12000	Tank Status:	Currently In Use
Install Date:	05/01/1995		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic;Double Walled (Int		

Map ID
 Direction
 Distance
 Distance (ft.)
 Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
 EPA ID Number

MEIJER GAS #142 (Continued)

U002264707

Facility ID:	22001415	Tank ID:	T00004
Owner:	MEIJER, STORES LIMITED PARTNERSH		
Owner Address:	2929 WALKER AVE NW GRAND RAPIDS, MI 49544		
Capacity:	8000	Tank Status:	Currently In Use
Install Date:	05/01/1995		
Content:	Diesel		
Tank Type:	Fiberglass Reinforced Plastic;Double Walled (Int		
Facility ID:	22001415	Tank ID:	T00005
Owner:	MEIJER, STORES LIMITED PARTNERSH		
Owner Address:	2929 WALKER AVE NW GRAND RAPIDS, MI 49544		
Capacity:	4000	Tank Status:	Currently In Use
Install Date:	05/01/1995		
Content:	Kerosene		
Tank Type:	Fiberglass Reinforced Plastic;Double Walled (Int		

L40
 SSE
 1/2-1
 5067 ft.
 Higher

MEIJER GAS STATION NO 142
4714 MILAN RD
SANDUSKY, OH 44870

RCRIS-SQG 1004763438
 FINDS OH0000981688

Site 2 of 2 in cluster L

RCRIS:
 Owner: MEIJER STORES LTD PARTNERSHIP
 (616) 453-6711
 EPA ID: OH0000981688
 Contact: MICHAEL CASE
 (616) 791-2582
 Classification: Conditionally Exempt Small Quantity Generator
 Used Oil Recyc: No
 TSD Activities: Not reported
 Violation Status: No violations found

FINDS:
 Other Pertinent Environmental Activity Identified at Site:
 Facility Registry System (FRS)
 Ohio Core database (OH_CORE)
 Resource Conservation and Recovery Act Information system (RCRAINFO)

41
 West
 1/2-1
 5140 ft.
 Higher

MIELKE FURNITURE REPAIR INC
3209 COLUMBUS AVE
SANDUSKY, OH 44870

RCRIS-SQG 1000287603
 FINDS OHD018301614

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

MIELKE FURNITURE REPAIR INC (Continued)

1000287603

RCRIS:

Owner: MIELKE FURNITURE REP INC
(312) 555-1212
EPA ID: OHD018301614
Contact: DANIEL MIELKE
(419) 625-4572

Classification: Small Quantity Generator
Used Oil Recyc: No
TSDf Activities: Not reported

Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:
Facility Registry System (FRS)
Ohio Core database (OH_CORE)
Resource Conservation and Recovery Act Information system (RCRAINFO)

M42 OHIO ROAD PAVING CO.
SW 204 E STRUB RD
1/2-1 SANDUSKY, OH 44870
5181 ft.
Higher Site 1 of 3 in cluster M

LUST 1002991116
N/A

LUST:

Owner: OHIO ROAD PAVING CO.
Facility Status: Inactive
LTF Status: 6 Closure of regulated UST
Release Number: 22004676-N00001
Owner Address: 8 E LONG ST
COLUMBUS, OH 43215
FR Status: No Further Action letter issued
Old Facility Id: 224676
Former LUST Release Number: 221223500
Release Date: Not reported

M43 BP OIL SITE 06660
SW 3704 COLUMBUS
1/2-1 SANDUSKY, OH 44870
5227 ft.
Higher Site 2 of 3 in cluster M

RCRIS-SQG 1004765280
FINDS OHD987020138

RCRIS:

Owner: BP OIL COMPANY
(216) 586-5398
EPA ID: OHD987020138
Contact: PETE PAONESSA
(216) 271-8739

Classification: Conditionally Exempt Small Quantity Generator
Used Oil Recyc: No
TSDf Activities: Not reported

Map ID
Direction
Distance
Distance (ft.)
Elevation Site

MAP FINDINGS

Database(s) EDR ID Number
EPA ID Number

BP OIL SITE 06660 (Continued)

1004765280

Violation Status: No violations found

FINDS:

Other Pertinent Environmental Activity Identified at Site:

- Facility Registry System (FRS)
- Ohio Core database (OH_CORE)
- Resource Conservation and Recovery Act Information system (RCRAINFO)

M44
SW
1/2-1
5227 ft.
Higher

BP OIL CO. #06660
3704 COLUMBUS
SANDUSKY, OH 44870
Site 3 of 3 in cluster M

LUST 1000561216
UST N/A

LUST:

Owner: COLES ENERGY, INC.
Facility Status: Active
LTF Status: 1 SUS/CON from regulated UST
Release Number: 22000260-N00001
Owner Address: 3619 ST RT 113 EAST
MILAN, OH 44846
FR Status: Tier 1
Old Facility Id: 220260
Former LUST Release Number: Not reported
Release Date: 6/6/00 0:00

UST:

Facility ID:	22000260	Tank ID:	T00001
Owner:	COLES ENERGY, INC.		
Owner Address:	3619 ST RT 113 EAST MILAN, OH 44846		
Capacity:	8000	Tank Status:	Currently In Use
Install Date:	01/01/1979		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic		
Facility ID:	22000260	Tank ID:	T00002
Owner:	COLES ENERGY, INC.		
Owner Address:	3619 ST RT 113 EAST MILAN, OH 44846		
Capacity:	10000	Tank Status:	Currently In Use
Install Date:	01/01/1979		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic		
Facility ID:	22000260	Tank ID:	T00003
Owner:	COLES ENERGY, INC.		
Owner Address:	3619 ST RT 113 EAST MILAN, OH 44846		
Capacity:	10000	Tank Status:	Currently In Use
Install Date:	01/01/1979		
Content:	Gasoline		
Tank Type:	Fiberglass Reinforced Plastic		

ORPHAN SUMMARY

City	EDR ID	Site Name	Site Address	Zip	Database(s)
BAYVIEW	1000873232	ODOT HIGHWAY BRIDGE	ST RTE 269 SECTION 1.11 BAYSID	44870	RCRIS-SQG, FINDS
PERKINS TOWNSHIP	1004768142	HIGHWAY BRIDGE	ST RT 2 SECTION 19312R	44870	FINDS, RCRIS-LOG
SANDUSKY	S104265902	UNKNOWN (CITY WATER/SEWER LINE)	SR 101	44870	LUST
SANDUSKY	1004768154	LOWES OF SANDUSKY #77	5500 5500 MILAN RD SPACE 304	44870	RCRIS-SQG, FINDS
SANDUSKY	1004763832	MATHEWS FORD SANDUSKY INC	610 PERKINS AVE	44870	RCRIS-SQG, FINDS
SANDUSKY	S104265877	UNKNOWN	PERKINS TOWNSHIP	44870	LUST
SANDUSKY	1004766498	PENSKE AUTO CENTER NO 3281	911 SANDUSKY MALL N	44870	RCRIS-SQG, FINDS
SANDUSKY	S104778826	O.E. MEYER CO.	1520 E STATE ST	44870	LUST
SANDUSKY	1001029319	ERIE COUNTY SCHOOLS	7142 TAYLOR-COLUMBUS AVE	44870	RCRIS-SQG, FINDS

EPA Waste Codes Addendum

Code	Description
D002	A WASTE WHICH HAS A PH OF LESS THAN 2 OR GREATER THAN 12.5 IS CONSIDERED TO BE A CORROSIVE HAZARDOUS WASTE. SODIUM HYDROXIDE, A CAUSTIC SOLUTION WITH A HIGH PH, IS OFTEN USED BY INDUSTRIES TO CLEAN OR DEGREASE PARTS. HYDROCHLORIC ACID, A SOLUTION WITH A LOW PH, IS USED BY MANY INDUSTRIES TO CLEAN METAL PARTS PRIOR TO PAINTING. WHEN THESE CAUSTIC OR ACID SOLUTIONS BECOME CONTAMINATED AND MUST BE DISPOSED, THE WASTE WOULD BE A CORROSIVE HAZARDOUS WASTE.
D007	CHROMIUM
D039	TETRACHLOROETHYLENE

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

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

Elapsed ASTM days: Provides confirmation that this EDR report meets or exceeds the 90-day updating requirement of the ASTM standard.

FEDERAL ASTM STANDARD RECORDS

NPL: National Priority List

Source: EPA
Telephone: N/A

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

Date of Government Version: 07/18/02
Date Made Active at EDR: 09/20/02
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 08/01/02
Elapsed ASTM days: 50
Date of Last EDR Contact: 08/01/02

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

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: 08/15/02
Date Made Active at EDR: 10/28/02
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 09/23/02
Elapsed ASTM days: 35
Date of Last EDR Contact: 09/23/02

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: 09/15/02
Date Made Active at EDR: 10/28/02
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 10/03/02
Elapsed ASTM days: 25
Date of Last EDR Contact: 09/23/02

CORRACTS: Corrective Action Report

Source: EPA
Telephone: 800-424-9346

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

Date of Government Version: 05/02/02
Date Made Active at EDR: 07/15/02
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 05/06/02
Elapsed ASTM days: 70
Date of Last EDR Contact: 09/09/02

RCRIS: Resource Conservation and Recovery Information System

Source: EPA/NTIS
Telephone: 800-424-9346

Resource Conservation and Recovery Information System. RCRIS includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA).

Date of Government Version: 09/09/02
Date Made Active at EDR: 10/28/02
Database Release Frequency: Varies

Date of Data Arrival at EDR: 09/24/02
Elapsed ASTM days: 34
Date of Last EDR Contact: 09/24/02

ERNS: Emergency Response Notification System

Source: EPA/NTIS
Telephone: 202-260-2342

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

Date of Government Version: 12/31/01
Date Made Active at EDR: 07/15/02
Database Release Frequency: Varies

Date of Data Arrival at EDR: 07/02/02
Elapsed ASTM days: 13
Date of Last EDR Contact: 07/24/02

FEDERAL ASTM SUPPLEMENTAL RECORDS

BRS: Biennial Reporting System

Source: EPA/NTIS
Telephone: 800-424-9346

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

Date of Government Version: 12/31/99
Database Release Frequency: Biennially

Date of Last EDR Contact: 09/16/02
Date of Next Scheduled EDR Contact: 12/16/02

CONSENT: Superfund (CERCLA) Consent Decrees

Source: EPA Regional Offices
Telephone: Varies

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

Date of Government Version: N/A
Database Release Frequency: Varies

Date of Last EDR Contact: N/A
Date of Next Scheduled EDR Contact: N/A

ROD: Records Of Decision

Source: 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.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 12/21/01
Database Release Frequency: Annually

Date of Last EDR Contact: 10/07/02
Date of Next Scheduled EDR Contact: 01/06/03

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: 07/18/02
Database Release Frequency: Quarterly

Date of Last EDR Contact: 08/01/02
Date of Next Scheduled EDR Contact: 11/04/02

FINDS: Facility Index System/Facility Identification Initiative Program Summary Report

Source: EPA
Telephone: N/A

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

Date of Government Version: 06/13/02
Database Release Frequency: Quarterly

Date of Last EDR Contact: 10/07/02
Date of Next Scheduled EDR Contact: 01/06/03

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: 05/31/02
Database Release Frequency: Annually

Date of Last EDR Contact: 10/21/02
Date of Next Scheduled EDR Contact: 01/20/03

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: 07/12/02
Database Release Frequency: Quarterly

Date of Last EDR Contact: 10/08/02
Date of Next Scheduled EDR Contact: 01/06/03

MINES: Mines Master Index File

Source: Department of Labor, Mine Safety and Health Administration
Telephone: 303-231-5959

Date of Government Version: 09/10/02
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 09/30/02
Date of Next Scheduled EDR Contact: 12/30/02

NPL LIENS: Federal Superfund Liens

Source: EPA
Telephone: 205-564-4267

Federal Superfund Liens. Under the authority granted the USEPA by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, the USEPA has the authority to file liens against real property in order to recover remedial action expenditures or when the property owner receives notification of potential liability. USEPA compiles a listing of filed notices of Superfund Liens.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 10/15/91
Database Release Frequency: No Update Planned

Date of Last EDR Contact: 08/26/02
Date of Next Scheduled EDR Contact: 11/25/02

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: 06/28/02
Database Release Frequency: Annually

Date of Last EDR Contact: 08/02/02
Date of Next Scheduled EDR Contact: 11/11/02

RAATS: RCRA Administrative Action Tracking System

Source: EPA
Telephone: 202-564-4104

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

Date of Government Version: 04/17/95
Database Release Frequency: No Update Planned

Date of Last EDR Contact: 09/10/02
Date of Next Scheduled EDR Contact: 12/09/02

TRIS: Toxic Chemical Release Inventory System

Source: EPA
Telephone: 202-260-1531

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

Date of Government Version: 12/31/00
Database Release Frequency: Annually

Date of Last EDR Contact: 09/24/02
Date of Next Scheduled EDR Contact: 12/23/02

TSCA: Toxic Substances Control Act

Source: EPA
Telephone: 202-260-5521

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

Date of Government Version: 12/31/98
Database Release Frequency: Every 4 Years

Date of Last EDR Contact: 09/09/02
Date of Next Scheduled EDR Contact: 12/09/02

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

Source: EPA
Telephone: 202-564-2501

Date of Government Version: 04/25/02
Database Release Frequency: Quarterly

Date of Last EDR Contact: 09/24/02
Date of Next Scheduled EDR Contact: 12/23/02

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: 12/31/00
Database Release Frequency: Annually

Date of Last EDR Contact: 10/22/02
Date of Next Scheduled EDR Contact: 01/20/03

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

STATE OF OHIO ASTM STANDARD RECORDS

SHWS: Master Sites List

Source: Ohio Environmental Protection Agency
Telephone: 614-644-2068

The Master Sites List is comprised of sites in Ohio where there is evidence of, or it is suspected that waste management has resulted in the contamination of air, water, or soil and there is a confirmed or potential threat to human health or the environment. Please be advised that this report does not constitute a determination that any site identified in the report is or may be contaminated. The Ohio EPA no longer maintains or publishes the MSL.

Date of Government Version: 03/01/99
Date Made Active at EDR: 04/21/99
Database Release Frequency: No Update Planned

Date of Data Arrival at EDR: 03/29/99
Elapsed ASTM days: 23
Date of Last EDR Contact: 09/09/02

SWF/LF: Licensed Solid Waste Facilities

Source: Ohio Environmental Protection Agency
Telephone: 614-644-2621

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

Date of Government Version: 07/08/02
Date Made Active at EDR: 08/29/02
Database Release Frequency: Annually

Date of Data Arrival at EDR: 08/02/02
Elapsed ASTM days: 27
Date of Last EDR Contact: 08/02/02

LUST: Leaking Underground Storage Tank File

Source: Department of Commerce
Telephone: 614-752-7924

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

Date of Government Version: 08/18/02
Date Made Active at EDR: 10/18/02
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 09/16/02
Elapsed ASTM days: 32
Date of Last EDR Contact: 09/16/02

UST: Underground Storage Tank Tank File

Source: Department of Commerce
Telephone: 614-752-7938

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

Date of Government Version: 08/18/02
Date Made Active at EDR: 10/18/02
Database Release Frequency: Quarterly

Date of Data Arrival at EDR: 09/16/02
Elapsed ASTM days: 32
Date of Last EDR Contact: 09/16/02

VCP: Voluntary Action Program Sites

Source: Ohio EPA, Voluntary Action Program
Telephone: 614-644-2924

Site involved in the Voluntary Action Program.

Date of Government Version: 07/16/02
Date Made Active at EDR: 08/09/02
Database Release Frequency: Semi-Annually

Date of Data Arrival at EDR: 07/19/02
Elapsed ASTM days: 21
Date of Last EDR Contact: 09/09/02

STATE OF OHIO ASTM SUPPLEMENTAL RECORDS

SPILLS: Emergency Response Database

Source: Ohio EPA
Telephone: 614-644-2084

All reported incidents, spills or releases to the environment.

GOVERNMENT RECORDS SEARCHED / DATA CURRENCY TRACKING

Date of Government Version: 12/31/99
Database Release Frequency: Varies

Date of Last EDR Contact: 09/01/02
Date of Next Scheduled EDR Contact: 12/09/02

DERR: Division of Emergency & Remedial Response's Database
Source: Ohio EPA, Div. of Emergency Response
Telephone: 614-644-3538
Sites that may or may not have contamination.

Date of Government Version: 06/01/02
Database Release Frequency: Semi-Annually

Date of Last EDR Contact: 09/16/02
Date of Next Scheduled EDR Contact: 12/16/02

EDR PROPRIETARY HISTORICAL DATABASES

Former Manufactured Gas (Coal Gas) Sites: The existence and location of Coal Gas sites is provided exclusively to EDR by Real Property Scan, Inc. ©Copyright 1993 Real Property Scan, Inc. For a technical description of the types of hazards which may be found at such sites, contact your EDR customer service representative.

Disclaimer Provided by Real Property Scan, Inc.

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OTHER DATABASE(S)

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

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

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

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

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 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

BECHTEL-MCLAUGHLIN, INC.
3612 MILAN ROAD
SANDUSKY, OH 44870

TARGET PROPERTY COORDINATES

Latitude (North): 41.425201 - 41° 25' 30.7"
Longitude (West): 82.673401 - 82° 40' 24.2"
Universal Transverse Mercator: Zone 17
UTM X (Meters): 360166.5
UTM Y (Meters): 4587098.5

EDR's GeoCheck Physical Setting Source Addendum has been developed to assist the environmental professional with the collection of physical setting source information in accordance with ASTM 1527-00, Section 7.2.3. Section 7.2.3 requires that a current USGS 7.5 Minute Topographic Map (or equivalent, such as the USGS Digital Elevation Model) be reviewed. It also requires that one or more additional physical setting sources be sought when (1) conditions have been identified in which hazardous substances or petroleum products are likely to migrate to or from the property, and (2) more information than is provided in the current USGS 7.5 Minute Topographic Map (or equivalent) is generally obtained, pursuant to local good commercial or customary practice, to assess the impact of migration of recognized environmental conditions in connection with the property. Such additional physical setting sources generally include information about the topographic, hydrologic, hydrogeologic, and geologic characteristics of a site, and wells in the area.

Assessment of the impact of contaminant migration generally has two principle investigative components:

1. Groundwater flow direction, and
2. Groundwater flow velocity.

Groundwater flow direction may be impacted by surface topography, hydrology, hydrogeology, characteristics of the soil, and nearby wells. Groundwater flow velocity is generally impacted by the nature of the geologic strata. EDR's GeoCheck Physical Setting Source Addendum is provided to assist the environmental professional in forming an opinion about the impact of potential contaminant migration.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

GROUNDWATER FLOW DIRECTION INFORMATION

Groundwater flow direction for a particular site is best determined by a qualified environmental professional using site-specific well data. If such data is not reasonably ascertainable, it may be necessary to rely on other sources of information, such as surface topographic information, hydrologic information, hydrogeologic data collected on nearby properties, and regional groundwater flow information (from deep aquifers).

TOPOGRAPHIC INFORMATION

Surface topography may be indicative of the direction of surficial groundwater flow. This information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

USGS TOPOGRAPHIC MAP ASSOCIATED WITH THIS SITE

Target Property: 2441082-D6 SANDUSKY, OH
Source: USGS 7.5 min quad index

GENERAL TOPOGRAPHIC GRADIENT AT TARGET PROPERTY

Target Property: General NNE

Source: General Topographic Gradient has been determined from the USGS 1 Degree Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified.

HYDROLOGIC INFORMATION

Surface water can act as a hydrologic barrier to groundwater flow. Such hydrologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

Refer to the Physical Setting Source Map following this summary for hydrologic information (major waterways and bodies of water).

FEMA FLOOD ZONE

<u>Target Property County</u>	FEMA Flood
ERIE, OH	<u>Electronic Data</u>
	YES - refer to the Overview Map and Detail Map

Flood Plain Panel at Target Property: 390153005C

Additional Panels in search area:
3901560005B
3901560006B
3901530050B
3901530075C
3901530070B

NATIONAL WETLAND INVENTORY

<u>NWI Quad at Target Property</u>	NWI Electronic
SANDUSKY	<u>Data Coverage</u>
	Not Available

HYDROGEOLOGIC INFORMATION

Hydrogeologic information obtained by installation of wells on a specific site can often be an indicator of groundwater flow direction in the immediate area. Such hydrogeologic information can be used to assist the environmental professional in forming an opinion about the impact of nearby contaminated properties or, should contamination exist on the target property, what downgradient sites might be impacted.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

AQUIFLOW®

Search Radius: 2,000 Miles.

EDR has developed the AQUIFLOW Information System to provide data on the general direction of groundwater flow at specific points. EDR has reviewed reports submitted by environmental professionals to regulatory authorities at select sites and has extracted the date of the report, groundwater flow direction as determined hydrogeologically, and the depth to water table.

<u>MAP ID</u>	<u>LOCATION FROM TP</u>	<u>GENERAL DIRECTION GROUNDWATER FLOW</u>
Not Reported		

GROUNDWATER FLOW VELOCITY INFORMATION

Groundwater flow velocity information for a particular site is best determined by a qualified environmental professional using site specific geologic and soil strata data. If such data are not reasonably ascertainable, it may be necessary to rely on other sources of information, including geologic age identification, rock stratigraphic unit and soil characteristics data collected on nearby properties and regional soil information. In general, contaminant plumes move more quickly through sandy-gravelly types of soils than silty-clayey types of soils.

GEOLOGIC INFORMATION IN GENERAL AREA OF TARGET PROPERTY

Geologic information can be used by the environmental professional in forming an opinion about the relative speed at which contaminant migration may be occurring.

ROCK STRATIGRAPHIC UNIT

Era:	Paleozoic
System:	Devonian
Series:	Middle Devonian
Code:	D2 (decoded above as Era, System & Series)

GEOLOGIC AGE IDENTIFICATION

Category: Stratified Sequence

Geologic Age and Rock Stratigraphic Unit Source: P.G. Schruben, R.E. Arndt and W.J. Bawiec, Geology of the Conterminous U.S. at 1:2,500,000 Scale - a digital representation of the 1974 P.B. King and H.M. Beikman Map, USGS Digital Data Series DDS - 11 (1994).

DOMINANT SOIL COMPOSITION IN GENERAL AREA OF TARGET PROPERTY

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the National Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps. The following information is based on Soil Conservation Service STATSGO data.

Soil Component Name:	LENAWEE
Soil Surface Texture:	silty clay loam
Hydrologic Group:	Class B/D - Drained/undrained hydrology class of soils that can be drained and are classified.
Soil Drainage Class:	Poorly. Soils may have a saturated zone, a layer of low hydraulic conductivity, or seepage. Depth to water table is less than 1 foot.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

Hydric Status: Soil meets the requirements for a hydric soil.

Corrosion Potential - Uncoated Steel: HIGH

Depth to Bedrock Min: > 60 inches

Depth to Bedrock Max: > 60 inches

Soil Layer Information							
Layer	Boundary		Soil Texture Class	Classification		Permeability Rate (in/hr)	Soil Reaction (pH)
	Upper	Lower		AASHTO Group	Unified Soil		
1	0 inches	9 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 2.00 Min: 0.60	Max: 7.80 Min: 5.60
2	9 inches	33 inches	silty clay loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit 50% or more), Fat Clay.	Max: 0.60 Min: 0.20	Max: 7.80 Min: 6.10
3	33 inches	60 inches	silt loam	Silt-Clay Materials (more than 35 pct. passing No. 200), Clayey Soils.	FINE-GRAINED SOILS, Silts and Clays (liquid limit less than 50%), Lean Clay	Max: 0.60 Min: 0.20	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: silt loam
loam

Surficial Soil Types: silt loam
loam

Shallow Soil Types: No Other Soil Types

Deeper Soil Types: stratified
silty clay

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.

GEOCHECK® - PHYSICAL SETTING SOURCE SUMMARY

WELL SEARCH DISTANCE INFORMATION

<u>DATABASE</u>	<u>SEARCH DISTANCE (miles)</u>
Federal USGS	1.000
Federal FRDS PWS	Nearest PWS within 1 mile
State Database	1.000

FEDERAL USGS WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No Wells Found		

FEDERAL FRDS PUBLIC WATER SUPPLY SYSTEM INFORMATION

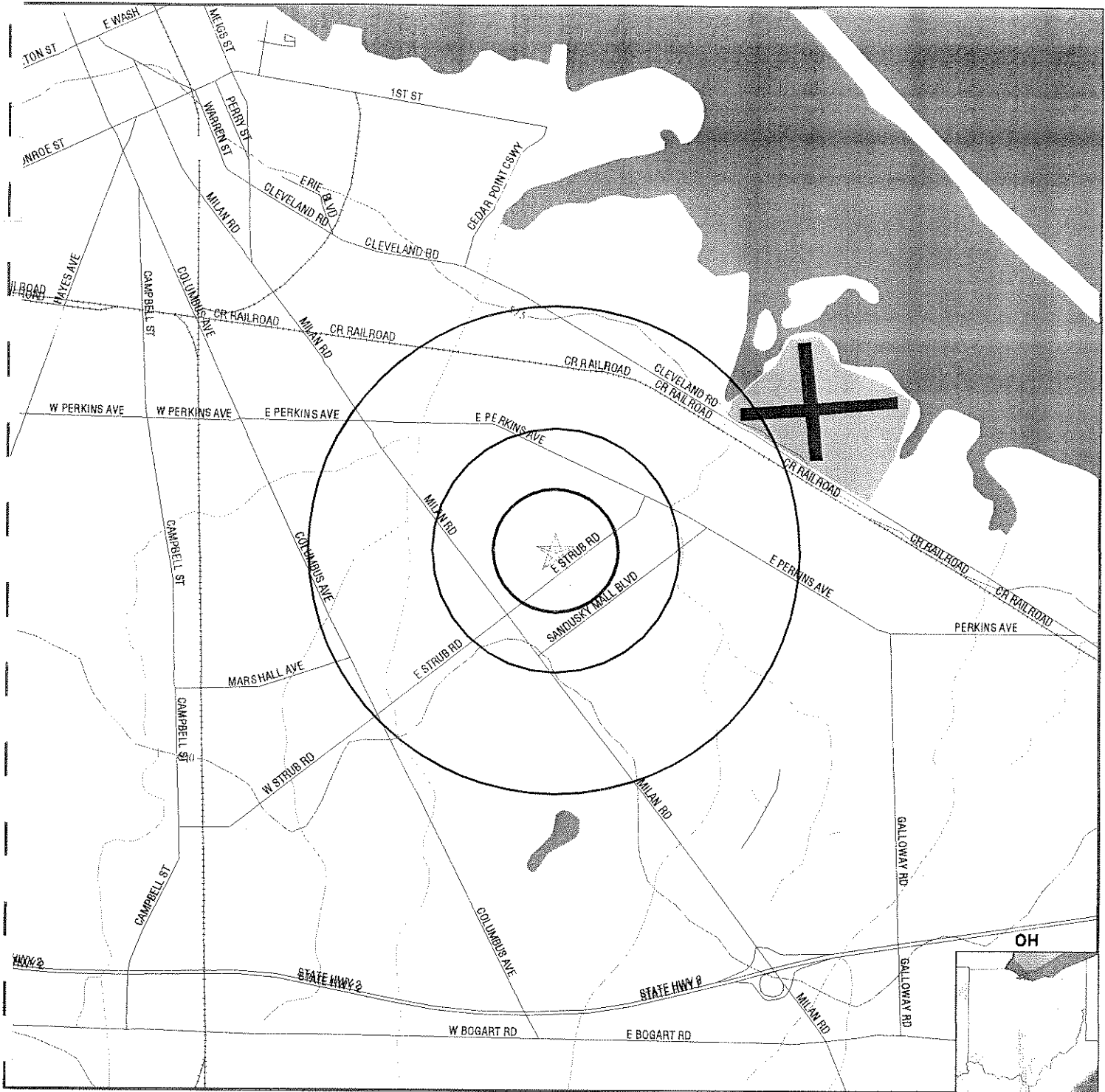
<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No PWS System Found		

Note: PWS System location is not always the same as well location.

STATE DATABASE WELL INFORMATION

<u>MAP ID</u>	<u>WELL ID</u>	<u>LOCATION FROM TP</u>
No Wells Found		

PHYSICAL SETTING SOURCE MAP - 0881199.1r



- ∇ County Boundary
- ∇ Major Roads
- ∇ Contour Lines
- ✕ Airports
- ⊙ Water Wells
- ⊕ Public Water Supply Wells
- ↑ Groundwater Flow Direction
- ⊓ Indeterminate Groundwater Flow at Location
- ⊖ Groundwater Flow Varies at Location
- Cluster of Multiple Icons

⊙ Earthquake epicenter, Richter 5 or greater

TARGET PROPERTY: Bechtel-McLaughlin, Inc.
ADDRESS: 3612 Milan Road
CITY/STATE/ZIP: Sandusky OH 44870
LAT/LONG: 41.4252 / 82.6734

CUSTOMER: Hull & Associates, Inc.
CONTACT: Karyn Selle
INQUIRY #: 0881199.1r
DATE: November 14, 2002 6:47 am

GEOCHECK® - PHYSICAL SETTING SOURCE MAP FINDINGS RADON

AREA RADON INFORMATION

Federal EPA Radon Zone for ERIE County: 2

Note: Zone 1 indoor average level > 4 pCi/L.

: Zone 2 indoor average level \geq 2 pCi/L and \leq 4 pCi/L.

: Zone 3 indoor average level < 2 pCi/L.

Federal Area Radon Information for Zip Code: 44870

Number of sites tested: 8

<u>Area</u>	<u>Average Activity</u>	<u>% <4 pCi/L</u>	<u>% 4-20 pCi/L</u>	<u>% >20 pCi/L</u>
Living Area - 1st Floor	2.433 pCi/L	100%	0%	0%
Living Area - 2nd Floor	Not Reported	Not Reported	Not Reported	Not Reported
Basement	6.813 pCi/L	38%	50%	12%

PHYSICAL SETTING SOURCE RECORDS SEARCHED

HYDROLOGIC INFORMATION

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

NWI: National Wetlands Inventory. This data, available in select counties across the country, was obtained by EDR in 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

The U.S. Department of Agriculture's (USDA) Soil Conservation Service (SCS) leads the national Cooperative Soil Survey (NCSS) and is responsible for collecting, storing, maintaining and distributing soil survey information for privately owned lands in the United States. A soil map in a soil survey is a representation of soil patterns in a landscape. Soil maps for STATSGO are compiled by generalizing more detailed (SSURGO) soil survey maps.

ADDITIONAL ENVIRONMENTAL RECORD SOURCES

FEDERAL WATER WELLS

PWS: Public Water Systems

Source: EPA/Office of Drinking Water

Telephone: 202-260-2805

Public Water System data from the Federal Reporting Data System. A PWS is any water system which provides water to at least 25 people for at least 60 days annually. PWSs provide water from wells, rivers and other sources.

PWS ENF: Public Water Systems Violation and Enforcement Data

Source: EPA/Office of Drinking Water

Telephone: 202-260-2805

Violation and Enforcement data for Public Water Systems from the Safe Drinking Water Information System (SDWIS) after August 1995. Prior to August 1995, the data came from the Federal Reporting Data System (FRDS).

USGS Water Wells: In November 1971 the United States Geological Survey (USGS) implemented a national water resource information tracking system. This database contains descriptive information on sites where the USGS collects or has collected data on surface water and/or groundwater. The groundwater data includes information on more than 900,000 wells, springs, and other sources of groundwater.

PHYSICAL SETTING SOURCE RECORDS SEARCHED

STATE RECORDS

Public Water System Data

Source: Ohio Environmental Protection Agency

Telephone: 614-644-3677

The database includes community, transient noncommunity and nontransient noncommunity water wells; and source treatment unit locations.

RADON

Area Radon Information

Source: USGS

Telephone: 303-202-4210

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: 202-564-9370

Sections 307 & 309 of IRAA directed EPA to list and identify areas of U.S. with the potential for elevated indoor radon levels.

OTHER

Epicenters: World earthquake epicenters, Richter 5 or greater

Source: Department of Commerce, National Oceanic and Atmospheric Administration



"Linking Technology with Tradition"

Sanborn® Map Report

Ship to: Karyn Selle

Hull & Associates, Inc.

6161 Cochran Road

Solon, OH 44139

Order Date: 11/13/2002 **Completion Date:** 11/14/2002

Inquiry #: 881199.2S

P.O. #: HEM078

Site Name: Bechtel-McLaughlin, Inc.

Address: 3612 Milan Road

City/State: Sandusky, OH 44870

1051545BAL

440-519-2555

Cross Streets: Strub Road

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

NO COVERAGE

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APPENDIX E

Ohio EPA Reports and Correspondences

Copy for WWD
Dir of Env
Dist 9/6

RECEIVED
MAY 22 1969
OHIO DEPARTMENT OF HEALTH
NORTHWEST DISTRICT OFFICE

file Erie Co.
Bechtel-McLaughlin
Ind. waste

May 12, 1969

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Theodore F. Lauber, President
Bechtel-McLaughlin, Inc.
3612 Milan Road
Sandusky, Ohio

Dear Mr. Lauber:

The Ohio Division of Wildlife investigated a pollution instance in Second Creek, Perkins Township, in Erie County during September, 1968. It was found that industrial wastes, highly toxic to wild animals, emanating from Bechtel-McLaughlin Plant entered Second Creek and killed ducks, fish and muskrats. It was further found that the loss to the people of the State of Ohio amounted to \$869.91.

All wild animals not legally confined are held in trust by the State of Ohio for the benefit of the people by virtue of Section 1531.02 of the Ohio Revised Code. Section 1531.04 places upon the Division of Wildlife through the Chief, the responsibility for enforcing the laws of the State protecting these wild animals.

Therefore, I respectfully request a check be made payable to the Ohio Division of Wildlife in the amount of \$869.91 and sent to the Pollution Office, 1500 Dublin Road, Columbus, Ohio 43215, to compensate the people of the State of Ohio for this loss.

If you need additional information on this matter, please contact Mr. John Davidson, Assistant Attorney General at this address.

Sincerely,

DAN C. ARMBRUSTER
Chief

DCA:jad:RF
bc: Midden, Davidson, McGilliard, Roach and Hall

NOTES ON INSPECTION OF INDUSTRIAL WASTE TREATMENT

FACILITIES AT BECHTEL-MCLAUGHLIN, INC. ERIE COUNTY

Bowling Green, Ohio, August 14, 1969

On August 4, 1969 the writer made a follow-up inspection of the industrial waste treatment facilities at Bechtel-McLaughlin, Inc. Mr. Ted Lauber was contacted and briefly interviewed.

The inspection disclosed that conditions were basically the same as observed on June 26, 1969. All plating wastes were being discharged with-
out treatment. The sodium hypochlorite pump was not operating and the sulfur dioxide gas cylinder had been disconnected. Mr. Lauber reported that the diaphragm on the gas cylinder had developed a leak "earlier in the day", necessitating the disconnection.

It appears that this company has no intention of satisfactorily operating its industrial waste treatment facilities and complying with the water quality standards. Bechtel-McLaughlin's permit expires September 1, 1969, and it is recommended that this company be issued a "cease and desist" or a "show cause" at minimum. This company should not be issued a new WPCB permit.

Thomas Allen
District Sanitary Engineer

TA/vlh

Bechtel-McLaughlin Spends \$140,000 To Curb Pollution

Bechtel-McLaughlin, Inc., is nearing completion of a \$140,000 anti-pollution system, Ted Lauber, the firm's president, said today.

THE PLANT, at 3612 Milan Rd., specializes in metal finishing.

Bechtel-McLaughlin has been dumping its wastes into a drainage tile that was originally built for the OSSH. The plant has legal rights to use the underground tile on its property deed, Lauber noted.

The underground tile feeds into Second Creek marsh, the site of many pollution complaints.

LAST YEAR in January the Ohio Water Pollution Control Board slapped a cease and desist order on the metal-finishing plant for dumping large amounts of cyanide.

After criticism and pressure from state officials and county health inspectors, Lauber ordered his system in April.

The \$140,000 system will:

1. Neutralize three liquid pollutants from the plant.
2. Send the neutralized solutions to a common 21,000-gallon settling basin for more treatment.
3. Further purify up to 75 per cent of the basin's product to be recycled into the plant.
4. Send the remaining 25 per cent into lagoons where solids will settle and "water safe for fish" will spill into the drainage tile.

THE THREE pollutants are chromium, cyanide and acid-alkali solutions from large vats used in the metal-finishing process. Lawn mower handles, car bumpers and the like are coated by being dipped from vat to vat.

The neutral solutions could be spilled into a sanitary sewer systems, Lauber contended, but have to be sent to the settling basin.

Lauber hopes the plant can treat up to 75 per cent of the solution in the basin and send it through the plant again. He called the recycling "the only way we can recoup from our investment."

WHILE THE WATER that comes out of the basin will be safe by state standards, it will not be pure enough to be used in the plant, Lauber said.

All the water from the basin cannot be reused because there are heavy solids generated during treatment, Lauber said. The 25 per cent that cannot be used will go to two lagoons where the solids will settle and the water will spill into the underground tile.

When the lagoons are filled, the wastes will be sent to the city landfill, Lauber said.

The solution coming out of the basin will be constantly monitored and recorded for state inspection. The entire system is controlled and monitored on a \$60,000 electronic master control panel that was made by Hytek International of Cleveland.

LAUBER SAID it will cost \$75 a day to operate his anti-pollution system.

Dept Columbia

POLLUTION, INITIAL REPORT

1. NAME OF WATERS <i>Sagard Creek</i>		2. SECTION <i>2</i>	3. TOWNSHIP <i>Perkins</i>	4. COUNTY <i>Eric</i>
5. NOTICE OF POLLUTION RECEIVED FROM (NAME, ADDRESS, PHONE NO., DATE, HOUR) <i>Sandusky Office 3-24-71 12:30 PM</i>				
6. ARRIVED AT SCENE (HOUR, DAY OF WEEK, MONTH, DAY, YEAR) <i>1:30 PM 3-24-71 Wed.</i>			7. CHECK BLOCK IF NO DEAD OR DYING WILD ANIMAL ARE FOUND <input checked="" type="checkbox"/> THEN FILL IN ITEMS 17 AND 18	

VALUE OF WILD ANIMALS KILLED IS LESS THAN \$25 (FILL IN ITEMS 8, 9, 17 AND 18)

8. NUMBERS OF EACH DEAD SPECIES COUNTED	TOTAL COUNT	TOTAL VALUE	RR. REPORTED TO DIST. SUPV.
		\$	

9. STATEMENT OF POLLUTION SOURCE OWNER (OR AGENT) RELATIVE TO CAUSE AND ABATEMENT PLANS

This was a bad dumping. Less Toll of Sandusky, Ohio made complaint phone 626-7703

VALUE OF WILD ANIMALS KILLED IS \$25 OR MORE (WORK IN THE FOLLOWING ORDER):

10. WATER SAMPLE TAKEN WHERE WILD ANIMALS WERE <input type="checkbox"/> DYING, <input type="checkbox"/> DEAD, IS LABELED No. 4 (<input type="checkbox"/> 4A, <input type="checkbox"/> 4B)	WATER TEMPERATURE HERE IS _____ DEGREES <input type="checkbox"/> F. <input type="checkbox"/> C.
11. REPORTED TO DISTRICT SUPERVISOR (DATE, HOUR, METHOD)	AIR TEMPERATURE _____ DEGREES <input type="checkbox"/> F. <input type="checkbox"/> C.
12. SAMPLE OF SUSPECTED POLLUTANT BEFORE ENTERING THE WATER IS LABELED No. 2 (<input type="checkbox"/> 2A, <input type="checkbox"/> 2B)	WATER TEMPERATURE HERE IS _____ DEGREES <input type="checkbox"/> F. <input type="checkbox"/> C.
13. SAMPLE WHERE SUSPECTED POLLUTANT ENTERED AND MIXED WITH WATER IS LABELED No. 3 (<input type="checkbox"/> 3A, <input type="checkbox"/> 3B)	WATER TEMPERATURE HERE IS _____ DEGREES <input type="checkbox"/> F. <input type="checkbox"/> C.
14. WATER SAMPLE UPSTREAM FROM WHERE SUSPECTED POLLUTANT ENTERED IS LABELED No. 1 (<input type="checkbox"/> 1A, <input type="checkbox"/> 1B)	WATER TEMPERATURE HERE IS _____ DEGREES <input type="checkbox"/> F. <input type="checkbox"/> C.
15. WATER SAMPLE DOWNSTREAM FROM WHERE DEAD ANIMALS ARE LOCATED IS LABELED No. 5 (<input type="checkbox"/> 5A, <input type="checkbox"/> 5B)	WATER TEMPERATURE HERE IS _____ DEGREES <input type="checkbox"/> F. <input type="checkbox"/> C.
16. SPECIES AND TAG NOS. OF FOUR DEAD WILD ANIMAL SPECIMENS COLLECTED	

ALWAYS FILL IN THESE ITEMS:

17. SUSPECTED POLLUTING SUBSTANCE, HOW IT ENTERED, OTHER PERTINENT OBSERVATIONS
Chrome or Cyanide or both. Entered from tile coming out in field between Perkins Ave and state st. to Health Dept's officials were at the scene they said substance was probably chrome or cyanide.

18. SUSPECTED POLLUTION SOURCE (NAME AND ADDRESS OF PERSON, BUSINESS, AND KIND OF PRODUCTS)
Bechtel Associates Milan Rd Sandusky, Ohio

- DISTRIBUTION OF COPIES: *M^{rs} Laughlin*
- DISTRICT ENFORCEMENT
 - DISTRICT FISH MANAGEMENT
 - DEPT. OF HEALTH
 - DIV. OF OIL AND GAS

A MAP OF THIS SITUATION IS IS NOT ATTACHED.
See map
Robert Tracy
 (SIGNATURE OF GAME PROTECTOR)

3-25-71 12:00 PM
 (HOUR AND DATE THIS REPORT COMPLETED AND MAILED)

RD.

Dirt ...

Under ground tile

Welded pipe

Sandy Creek

Close ...

Parasitology AP

1976

Stanley ...
Air Port

RECEIVED
MAR 26 1971
WILDLIFE DIVISION

MEMORANDUM

TO: Mr. G. A. Hall, Water Pollution Control Board..... DATE: March 30, 1971.

FROM: E. F. Armstrong, Engineer.....

SUBJECT:

24

On March 25, 1971, Mr. Toll, owner of the property through which the discharge from Bechtel-McLaughlin, Inc. flow, notified the Northwest District Office of pollution coming from the company. Mr. Chuck Hall from the NWDO contacted Mr. Toll and collected samples of the receiving stream. Three representatives of the Department of Natural Resources were also present. The receiving stream appeared light green. After the stream had entered Sandusky Bay, a yellowish green color was noted in a 200 ft. radius from the stream discharge point.

Mr. Hull contacted Bill Sheets, Plant Manager, at the company. Mr. Sheets was not aware of any problem with the industrial waste treatment system. Inspection of the system revealed a rupture in part of the chrome reduction system. Untreated hexavalent chrome waste was entering a floor drain which discharges to the stream. Mr. Sheets said he would immediately stop all overflow rinses following chrome solutions until the chrome treatment system was put back in operation.

I telephoned Mr. Ohlemacher, Chemist for Bechtel-McLaughlin, Inc. during the afternoon of March 25, 1971. He said he was aware of the leak at 8:30 a.m. that morning. He also said he notified the maintenance personnel to make the necessary repairs, but since he had to leave the plant he was unable to make sure the repairs were made immediately. Mr. Ohlemacher said all except one chrome rinse had been shut off. This one was going directly to the stream without treatment. I told him to properly treat this chrome rinse or shut-down the plating line. Mr. Ohlemacher said the company still had to make money. I told him the discharge of untreated industrial waste was a direct violation of the court order.

At that time I told Mr. Ohlemacher to write a detailed report by March 29, 1971, including (1) what had happened, (2) what steps were taken to correct the problem, and (3) what action would be taken to prevent it from happening again. I made arrangement to meet at the plant on March 29, 1971, to pick up the report and inspect the new treatment system now under construction.

I met with Mr. Orlemacher and Mr. Lauber from the company on March 29, 1971. Mr. Hull and Mr. Rupert from the Northwest District Office were also present. I asked Mr. Orlemacher for the detailed report which I requested on March 25, 1971.

Mr. G. A. Hall
Page two
March 30, 1971

He said he devoted all his time to getting the chrome system back in operation and therefore, did not have time to write the report. He agreed to give me the report by April 1, 1971.

Partial analysis of the sample of the receiving stream collected by Mr. Hull on March 25, 1971 is as follows:

Cyanide	7.09 ppm
Total Chrome	3.94
Copper	0.84
Zinc	12.0



Bechtel - McLaughlin, Inc.

METAL FINISHING - - ELECTROPLATING
RUSTPROOFING - - INDUSTRIAL PAINTING

3612 Milan Road

625-3873

SANDUSKY, OHIO 44870

March 30, 1971

State of Ohio Department of Health
Division of Engineering
P.O. Box 118
Columbus, Ohio 43216

Attention: Mr. E. Armstrong

Re: Sample Check 3-24-71

Gentlemen:

As requested during your plant visit March 29, 1971, regarding a sample of effluent picked up from our treatment plant showing evidence of chromium bearing wastes, we will attempt to describe the reason for this change in condition.

Investigation of the chrome reduction unit showed a failure in the regulator supplying Sulfur Dioxide to our unit. This prevented the proper amount of sulfur dioxide to complete total reduction of the chrome.

Analysis of the sample left in our lab of the effluent being discharged during this malfunction showed 6.15 ppm Hexavalent Chromium.

Investigation also showed a crack on a weld coupling in the chrome receiver which allowed a small quantity of chrome effluent to bypass the unit.

The evening of March 24, 1971, the unit was shut down, after working hours, and a patch applied to the chrome receiver, thus preventing bypass of any effluent. To correct the malfunction of the sulfur dioxide regulator, we removed an injector from our unit under construction, placed it onto our old unit and connected the injector to our new "Vee" notch sulfinator. This will be utilized until we change over to our new plant facilities.

Analysis of subsequent samples on 3-25-71, collected at 10:30 A.M. and 2:30 P.M., showed 0.32 and 0.87 ppm. On 3-26-71 at 9:30 A.M. and 1:30 P.M. - 0.75 and 0.34 ppm and on 3-30-71 at 8:30 A.M. and 10:00 A.M. - 0.30 and 0.26 ppm. All cyanide bearing wastes were less than 0.90 ppm with samples taken at the above times.

We will continue to operate this unit as now connected until the week-end of 4-9-71, at which time, the change over from our existing facilities will take place.



Bechtel - McLaughlin, Inc.

METAL FINISHING - - ELECTROPLATING
RUSTPROOFING - - INDUSTRIAL PAINTING

3612 Milan Road

625-3873

SANDUSKY, OHIO 44870

Page 2

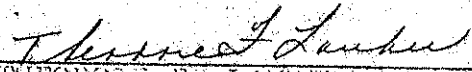
After reviewing our change over with the field representative from Mytek International today, the tentative schedule is this:
Week of 3-29-71 - complete installation of all wiring and probes for instrument read out.

Week of 4-5-71 - cycle plant by making predetermined additions of chromium and cyanide to sumps, cycle thru to check instrumentation and over weekend 4-9-71 change over tiles from plant to new sumps.

The unit will be cycled for approximately one week before connection to our lines in the plant. This will allow us time to establish filter loading of the treated water and also quality before utilizing this effluent in our finishing operations.

Sincerely yours,

BECHTEL-McLAUGHLIN, INC.


THEODORE F. LAUMER

TFL:jp

NOTES ON INSPECTION TRIP TO BECHTEL-MCLAUGHLIN INC., SANDUSKY,
OHIO.

On May 20, 1971, Chuck Hull and Edward Armstrong inspected the new industrial waste treatment facilities of Bechtel-McLaughlin. Mr. John Ohlemacher, chemist for the company, and Mr. Tom Phillipp, consultant, accompanied us during the inspection. The findings, results and recommendations are as follows:

FINDINGS

1. Pools of concentrated chrome solution were located in the company's solid waste dumping area.
2. Piping from the manufacturing building to the new industrial waste treatment system had not been covered. Approximately 40 ft of the acid-alkali sewer had been laid backwards.
3. An abandon process sewer, located parallel to the new acid-alkali sewer, could be seen in the bottom of the trench.
4. The new acid-alkali process sewer was entering the new holding tank approximately one ft from the bottom. A mistake in properly locating the bottom elevation of the holding tank has eliminated the usefulness of the tank capacity. Presently, when an acid or alkali tank is being dumped the solution backs up into the manufacturing building due to this mistake in elevation.
5. The chrome and cyanide waste were being discharged to the old system from which the wastes were pumped through flexible hoses to the new chrome and cyanide holding tanks. This was necessary since the bottom of the new holding tanks were not located at the proper elevation.

6. Mr. Ohlemacher stated that he has had difficulties with the new system. Especially the pump and meter malfunction. Inspection of the clarifier revealed floc carryover into the discharge line.

7. The new system was designed to allow reclaim of part of the treated effluent. Mr. Ohlemacher indicated that all effluent was being discharged to the stream until he got the new system operating efficiently.

8. Mr. Hull, heard water flowing in the storm water drain and asked Mr. Ohlemacher if he knew the source of the water. Mr. Ohlemacher stated that they recently discovered a process area which contained acid-alkali waste only which was tied into the storm sewer system instead of the industrial waste treatment system. A sample of this process water, which undergoes no treatment, was collected for analysis. Approximately 20 gpm of the total flow of 160 gpm was being bypassed. A sample of the total industrial waste flow could not be collected.

9. Inspection of the plating operation revealed that the plating lines were not in the same location as indicated on the approved detail plans.

RESULTS

Analysis of the sample collected from the process water bypass:

Cyanide - 166 ppm

Complete analysis of the samples collected will be submitted when they become available.

RECOMMENDATIONS

1. Prior to leaving the plant, Mr. Armstrong gave Mr. Ohlemacher the following recommendations:

- (a) Cease dumping any liquid waste in their solid waste dumping area.
- (b) Relay the process pipe that was installed backwards to prevent any future problems.

- (c) Remove the abandon process sewer located parallel to the new acid-alkali sewer, to ensure that untreated process water cannot bypass the new treatment system.
- (d) Take the necessary steps to properly locate the three new holding tanks so they will operate as stated in the approved detail plans.
- (e) Place the new industrial waste treatment system in efficient operating order.
- (f) Divert all process water to the new treatment system.
- (g) Submit revised detail plans to the Ohio Department of Health which indicate the location of all manufacturing processes as well as the location and point of discharge of all drains and sewers. In the future, notify the Ohio Department of Health before any manufacturing processes are relocated.

2. After considering the condition of the treatment system and reviewing the analysis of the solution which was bypassing the treatment system, It is recommended that the Attorney General take appropriate steps to prevent further pollution.

Edward F. Armstrong
Engineer
Industrial Waste Section

EFA:mj

NOTES ON A VISIT TO BECHTEL-McLAUGHLIN IN SANDUSKY

Bowling Green, June 4, 1971

On June 4, 1971 the writer visited the Bechtel-McLaughlin plant to collect samples and review the progress of the wastewater improvements.

During an inspection on May 20, 1971, several by-passes, leaks, and inefficiencies were discovered. The main sewer leading to the new treatment plant was leaking into the old plant sewer and therefore by-passing untreated. It was undoubtedly this material which accounted for the 166 mg/l CN by-pass on May 20. Also tied into this old sewer was some flow from a phosphatizing operation. This leak from the main sewer was also noted on June 4, and company officials stated they would "look into" repairing the problem.

Kip Olesnaker, Plant Chemist, stated there was a large chrome spill from a ruptured valve on a drag-out line that occurred on May 31. The chrome apparently got into the acid-alkali sump and cyanide sump where it was batch treated with $\text{Na}_2 \text{S}_2 \text{O}_5$. However a portion of the chrome spill would have undoubtedly leaked into the old sewer and by-passed the treatment plant. At the time of the inspection the emergency lagoon was filled with chrome and awaiting treatment. Mr. Olesnaker reported that he knew of no chrome which had entered the receiving stream.

Charles A. Hall
District Engineer

CAH/gps

cc: G. A. Hall, WPCB
cc: Central Office
Ed Armstrong
Earl Richards

NOTES ON A VISIT TO BECHTEL-MOLAUGHLIN IN SANDUSKY

Bowling Green, June 21, 1971

On June 17, 1971, the writer visited the Bechtel-McLaughlin plant to collect samples and review the progress of the wastewater improvements.

Status of conditions at the plant were essentially the same as the June 4, 1971 visit.

The findings of this visit are as follows:

- 1) Pools of what appeared to be concentrated chrome solution were located at the back of the plant.
- 2) Large acid-alkali line was still laid backwards and was leaking into the old process sewer.
- 3) The small acid-alkali line had developed a leak and the liquid was flowing in the trench to the emergency holding lagoon. It was noted that this water had deposited yellowish-green solids in the trench. The contents of the lagoon are pumped daily to the acid-alkali sump.
- 4) The water which had been noted flowing over the ground at the back of the plant for a distance of about 40 feet, contained yellowish-green solids in suspension. This liquid which by-passes the treatment system and gets into the storm sewer was reported to be acid-alkali waste.
- 5) The clarifier was noted to have some small flock carry-over.

- 6) The sludge lagoon had developed a break and the liquid was noted to be pooled over an area at the bank of the plant. A sample of this material was taken.

In general, it seems that problems and difficulties with the new system remain plentiful as valves, pumps, lines, and probes continue to need replacements.

Charles A. Hall
District Engineer

CAH/gps

cc: G. A. Hall, W.P.C.E.
cc: Central Office
Ed Armstrong
Earl Richards

State of Ohio

Address Reply to:

Engineer-Secretary
450 East Town Street
P. C. Box 118
Columbus, Ohio 43216



Department of Health Water Pollution Control Board

Re: Erie County
Perkins Township
Industrial Wastes

July 12, 1971

Mr. Theodore F. Lauber
Bechtel-McLaughlin, Inc.
3612 Milan Road
Sandusky, Ohio 44870

Dear Mr. Lauber:

As a result of Board action June 23, 1971, it was determined that your company is discharging industrial wastes from your plating plant into waters of the state and is in violation of the approved Water Quality Standards.

Pursuant to Section 6111.06 (C) of the Ohio Revised Code, the Board has determined that an emergency exists requiring you to immediately cease and desist the above mentioned discharge.

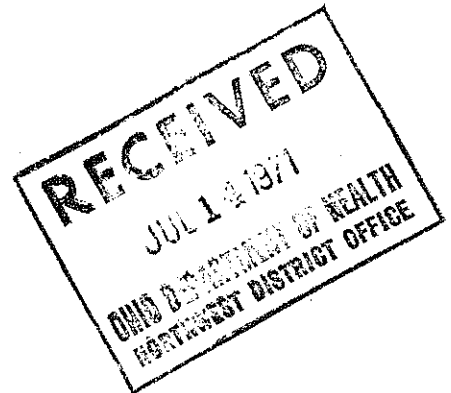
Upon application to the Board you will be afforded a hearing as soon as possible and not later than twenty (20) days after such application.

Yours truly,

T. A. Gardner, M.D., Chairman
Water Pollution Control Board

Certified mail

cc: Attorney General
cc: Health Commissioner
cc: Northwest District Office
cc: Division of Engineering



NOTES ON A VISIT TO BECHTEL-MC LAUGHLIN IN SANDUSKY

Bowling Green, August 27, 1971

On August 19, 1971, the writer visited the Bechtel-McLaughlin plant to collect samples and review the progress of wastewater improvements.

Status of conditions at the plant were as follows:

- 1) Large acid-alkali line remains installed backwards, and along with the small acid-alkali line has sprung numerous leaks.
- 2) Trenches inside the plant have been completed which will eventually allow the liquid wastes from the barrel area to be treated. Due to grade problems these waters presently discharge behind the plant, directly to the storm sewer.
- 3) The concrete sumps, which will replace the improperly installed steel tanks, should be in use in about four weeks.
- 4) The sludge lagoon was filled to the point of overflowing liquid onto the ground at the back of the plant.
- 5) A considerable floc carry-over was noted in the clarifier.

The company is presently circulating about 40% of the effluent through the reclaim filters to help in the reduction of suspended solids.

Samples were taken of the treatment plant effluent, by-pass, and receiving stream. The receiving stream sample had a greenish tint and a CN content of .25 ppm.

It is obvious that Bechtel-McLaughlin has not complied with the cease and desist order which was issued by the board on July 12, 1971.

NOTES ON A VISIT TO RECHTEL-MC LAUGHLIN IN SANDUSKY

Bowling Green, September 10, 1971

On September 7, 1971 the writer made a brief check of the above company. Observations are as follows:

- 1) Tile was installed to convey the acid-alkali wastes from the barrel area to the waste treatment plant. Prior to this, grade problems, frequently caused a back-up of wastewater in the plant and a subsequent overflow to the storm sewer.
- 2) Cyanide and chrome wastes from the barrel area can still overflow into the storm sewer.
- 3) At the time of the inspection, the water which was flowing over the ground at the back of the plant was 40% of the effluent which is sent through the reclaim filters.
- 4) Large floc carry-over in the clarifier.
- 5) Contents from the sludge lagoon were observed over a large area at the back of the plant. It is the writers contention that this lagoon is an inadequate sludge disposal device.

Charles A. Hall
District Engineer

CAH/gps

Re: Permit Violations/Self-Monitoring Reports
Ohio EPA Permit No. R204*BD
Station No. 001

*Certified
Letter*

March 15, 1978

Bechtel-McLaughlin, Inc.
3612 Milan Road
Sandusky, OH 44870

Dear Mr. Ohlemocher:

Review of the self-monitoring reports for August, September, October, November, and December, 1977 submitted in conformance with your NPDES Permit indicates the following effluent violations:

<u>Parameter</u>	<u>Permit Terms</u>	<u>Value Reported</u>
<u>AUGUST</u>		
Copper	0.500 mg/l (max.)	0.900 mg/l
Free Cyanide	0.005 mg/l (max.)	0.026 mg/l
"	"	0.020 mg/l
"	"	0.018 mg/l
"	"	0.017 mg/l
"	"	0.012 mg/l
"	"	0.010 mg/l
Free Cyanide	0.004 kg/day (max.)	0.010 kg/day
"	"	0.010 kg/day
"	"	0.009 kg/day
"	"	0.009 kg/day
"	"	0.006 kg/day
"	"	0.005 kg/day
<u>SEPTEMBER</u>		
Copper	0.500 mg/l (max.)	0.700 mg/l
Free Cyanide	0.005 mg/l (max.)	0.014 mg/l
"	"	0.011 mg/l
"	"	0.008 mg/l
"	"	0.006 mg/l
"	0.004 kg/day	0.008 kg/day
"	"	0.006 kg/day
<u>OCTOBER</u>		
Free Cyanide	0.010 mg/l (max.)	0.012 mg/l
"	0.004 kg/day (max.)	0.0047 kg/day

Bechtel-Walugin, Inc.

Page 2

March 15, 1978

<u>Parameter</u>	<u>Permit Terms</u>	<u>Value Reported</u>
<u>OCTOBER (cont'd)</u>		
T.NFLT Residue	15 mg/l (max.)	20 mg/l
"	10 mg/l (avg.)	13.0 mg/l
pH	daily	5X
Flow	"	23X
<u>NOVEMBER</u>		
Free Cyanide	0.004 kg/day (max.)	0.016 kg/day
"	"	0.005 kg/day
Zinc	0.010 mg/l (max.)	0.026 mg/l
T.NFLT Residue	1.000 mg/l (max.)	1.200 mg/l
"	15 mg/l (max.)	18.0 mg/l
"	10 mg/l (avg.)	13.4 mg/l
pH	daily	4X
<u>DECEMBER</u>		
Free Cyanide	0.002 kg/day (max.)	0.005 kg/day
"	"	0.004 kg/day
"	"	0.0025 kg/day
T.NFLT Residue	6.27 kg/day (max.)	7.86 kg/day
"	"	7.24 kg/day
"	4.17 kg/day (avg.)	6.55 kg/day
T.NFLT Residue	10 mg/l (avg.)	12.7 mg/l
Copper	0.209 kg/day (max.)	0.266 kg/day
Chromium	0.125 kg/day (max.)	0.150 kg/day
Zinc	1.000 mg/l (max.)	1.200 mg/l
"	0.417 kg/day (max.)	0.546 kg/day
"	"	0.519 kg/day
"	"	0.463 kg/day
pH	daily	5X
"	continuous	composite

Although some of these loading violations will be eliminated when the proposed NPDES renewal comes out, the remaining violations are a continuing problem. We are requesting that you formulate a plan for improving the quality of your discharge and submit that to this office. In the meantime, interim steps should be taken to minimize violations.

Ohio EPA

INITIAL POLLUTION INCIDENT REPORT 19 87

- I.D. Number 19-22-2876
- 1) Time & Date Reported 1755 12-15-86 2) Discovered PM 12 15 3) Occurred PM 12-15
- 4) Reported by (Name & Position) Don Higgins & Steve Caselli, Erie Co H.A.D.
- 5) Telephone _____ 6) Did Spiller Report? Yes No 7) Complaint no Yes No
- 8) Suspected Spiller Unk (2 ~~Lawrence Research Center~~ Rochd-McDuffie)
- 9) Mailing Address _____
- 10) Product Spilled Chrom, Cobalt, Nickel plating waste
- 11) Approximate Amount (Duration) 20 gallons
- 12) Source of Spill Unk
- 13) Waterway Affected Plum Brook 14) Weather _____
- 15) Location (City & County) Sandy, ~~Franklin~~ FRIF County
- 16) Did You Tell The Spiller To Call The N.R.C? Yes No (1-800-424-8802 Washington D.C.)

17) Comments and Follow-up Information

Dr. Olsen from Fieldlands Campus II running sampler vegetation

High Chromium, Cobalt Oxide, Nickel??

plates & LiACA spectra

- ODA 12-16: Dave Wimmer spill no major problems to Plum Brook - Much Ado about very little

Telephone Record

- | | | |
|--|--------------------------------|----------------------------------|
| 1) District Office <u>AW</u> | Talked to <u>Don Higgins</u> | Time & Date <u>1755 12-15</u> |
| 2) Water Supply (8307)
Ken Applegate 891-5167 (home) | Talked to <u>Ken Applegate</u> | Time & Date <u>1755 12-15</u> |
| 3) District Engineer | Talked to _____ | Time & Date _____ |
| 4) ODNR (6020) (night: 466-3059)
Paul Woner 876-4342 (home) | Talked to _____ | Time & Date _____ |
| 5) ODA (866-6361)
Oren Spilker 866-4347 (home) | Talked to _____ | Time & Date _____ |
| 6) ODH (5190)
Roger Suppes 888-1411 | Talked to _____ | Time & Date _____ |
| 7) PIC (8508) Al Franks 263-0220 (home) | Talked to <u>Al Franks</u> | Time & Date <u>1815 12-15/86</u> |
| 8) SFM (864-5510)
Don Ryan 471-4363 (home) | Talked to _____ | Time & Date _____ |
| 9) <u>DIA</u> | Talked to <u>Bill Evans</u> | Time & Date <u>1805 12-15</u> |
| 10) _____ | Talked to _____ | Time & Date _____ |

Received by Ken Applegate

Follow-up

Business Yes No

District Yes No

TSS Alum Yes No

DISTRICT OFFICE INVESTIGATION REPORT

SPILL NUMBER: 12-22-2876 Continuing: (Date) Completed: 12/16/81 Date Submitted: 12/22/81 (To C.O.)

1) Time & Date Occurred: PM 12/15/81 2) Time & Date Reported: 1730 12/15/81
3) Time & Date Discovered: PM 12/15/81
4) Reported by: STEVE CASALLI FRIELOT Phone Number: 419-626-5623
6) Entity Name and Address: BECHTEL-McLAUGHLIN 3612 MILAN RD SANDUSKY, OHIO 44870
7) Permit: X Yes No
8) SPCC Plan Required: Yes X No
9) SPCC in Effect: Yes X No
10) Representative Contacted: JOHN OENAKER Title: Plant Manager
11) Phone Number: Work: 419-625-3873 Home:
12) Location of Spill: (City) SANDUSKY (County) ERIE (Twp.)

13) Product Spilled: CHROME PLATING WASTE
14) Amount Spilled: 20 GAL Recovered: 0 Lost: 20 GAL
15) Cause and/or Source:
16) Waterway Effected: HENNINGER DITCH TRIB L. ERIE
17) Length of Area Effected: 5/4 mi
18) Stage of Water: High, Low, Average. 19) Land Surface (Area):
20) Containment Action (By Spiller: Yes, No) NO CLEANUP ECONOMICALLY FEASIBLE

21) Engineering Referral Made (Yes, No) Name: Date:
OEPA EXPENSES
1) Regular Time: 2) Overtime: 7:30 (1730-0100) 3) Mileage: 134 MILES
4) Equipment:
5) Number & Type of Photos:

6) Field Test (Number): Type of Analysis:
7) Lab Samples (Number): Type of Analysis:

COMMENTS

SMALL AMT. LOST (EST 20 GAL) VERY LIGHT GREEN DISCOLORATION OF H2O. DR. RISEN OF FIREMANS CAMPUS BGSU RAN SOME SAMPLES - PRIMARILY CHROME BUT SMALL AMT. HAD WTP CHECK RAN H2O DAILY FOR 1 WEEK AS PRECAUTION BUT INTAKE OUT IN L. ERIE 2 MI FROM DITCH SO SHOULD NOT BE AFFECTED

O.S.C. [Signature] Time & Date on Scene: 1900 12/15/81

OVERTIME AND EQUIPMENT SPILL EXPENDITURE FORM

PERIOD: _____ NAME E.R.: Donald C Higgins PCH #: 14005.0

SPILL #: 12-22-2876 ENTITY NAME: BELTEL McLAUGHLIN NPDES #: F 204*CD

AT RESS: P.O. Box 1110 SANDUSKY, OHIO 44870

PRODUCT: Chromic Acid AMOUNT: 20 GAL +

TIME/DATE OCCURRED: 0900 12/15/81 TIME/DATE WORKED: 1730 - 0100 12/15/81

CAUSE OF INCIDENT: MALFUNCTION @ TREATMENT SYSTEM

WATERWAY AFFECTED OR THREATENED: HEMMINGWAY DITCH

BY TIME HRS/MIN: 730 1730 - 0100 12-15-81 COMP. TIME HRS/MIN: _____

D.T./C.T. WORKED ON FOLLOWUP SPILLS: _____

STATE EQUIPMENT AND OTHER EXPENSES: 137 MILES

ADDITIONAL INFORMATION: _____

Ohio EPA

DISTRICT OFFICE INVESTIGATION REPORT

SPILL NUMBER: 12-22-2878 Continuing: _____ Completed: 12/16/81 Date Submitted: 12/24/81
(Date) (Date) (To C.O.)

- 1) Time & Date Occurred: 2200 12/15/81 2) Time & Date Reported: 0925 12/16/81
 3) Time & Date Discovered: 0925 12/16/81
 4) Reported by: JOE CASALI ERIE CO H.D. 5) Phone Number: 419-626-5623
 6) Entity Name and Address: BAHNER McLAUGHLIN 7) Permit: Yes No
3612 MILAN RD. Number: _____
SAWDOUSKY, OHIO 44870 8) SPCC Plan Required: Yes No
 9) SPCC in Effect: Yes No
 10) Representative Contacted: JOHN OLEMAKER Title: PLANT MGR.
 11) Phone Number: Work: 419-625-3873 Home: _____
 12) Location of Spill: (City) SAWDOUSKY (County) ERIE (Twp.) _____

- 13) Product Spilled: CHROMIC ACID SOLN 0.12 ppm
 14) Amount Spilled: 30,000 GAL Recovered: 0 Lost: 30,000 GAL
 15) Cause and/or Source: TANK LEAK
 16) Waterway Effected: HEMMINGER DITCH
 17) Length of Area Effected: 3/4 MI
 18) Stage of Water: High, Low, Average. 19) Land Surface (Area): _____
 20) Containment Action (By Spiller: Yes No NONE FEASIBLE

21) Engineering Referral Made (Yes No Name: _____ Date: _____

OEPA EXPENSES

- 1) Regular Time: 2:00 11/16/81 2) Overtime: _____ 3) Mileage: 100
 4) Equipment: _____
 5) Number & Type of Photos: _____
 6) Field Test (Number): _____ Type of Analysis: _____
 7) Lab Samples (Number): _____ Type of Analysis: _____

COMMENTS

ADVISED DUTY TO CONTINUE TO MONITOR RAW A.C.
OLEMAKER TO REPAIR TANK & MONITOR pH &
CHANGE IN CL. CASALI TO KEEP US ADVISED

O.S.C. [Signature] Time & Date on Scene: 1000 12/16/81

Ohio EPA

INITIAL POLLUTION INCIDENT REPORT 19 81

d

I.D. Number 12-72-2878

1) Time & Date Reported 0925 12/16 2) Discovered 2200 12/15 3) Occurred _____

4) Reported by (Name & Position) Steve Casali - COHD

5) Telephone 419-626-5623 6) Did Spiller Report? Yes No 7) Complaint Yes No

8) Suspected Spiller Bechtel-McLavelin John Obleman

9) Mailing Address ~~3642~~ P.O. Box 1110 Sandusky 44870

10) Product Spilled Chromium acid 5% 44870

11) Approximate Amount (Duration) unk 30,000 gal mix w/ water

12) Source of Spill leaking tank - leak in tank

13) Waterway Affected 0 Phon Brook Hemlock weather

15) Location (City & County) Eric Co Sandusky
3612 Milan Rd

16) Did You Tell The Spiller To Call The N.R.C? Yes No (1-800-424-8802 Washington D.C.)

17) Comments and Follow-up Information

2.4 ppm - spill point pH at creek
John Obleman, Company rep -
System - 0.2 ppm Hexavalent

Telephone Record

- | | |
|--|---|
| 1) District Office <u>NW</u> | Talked to <u>Don Higgins</u> Time & Date _____ |
| 2) Water Supply (8307)
Ken Applegate 891-5167 (home) | Talked to _____ Time & Date _____ |
| 3) District Engineer | Talked to _____ Time & Date _____ |
| 4) ODNR (6020) (night: 466-3059)
Paul Woner 876-4342 (home) | Talked to <u>Paul Woner</u> Time & Date _____ |
| 5) ODA (866-6361)
Oren Spilker 866-4347 (home) | Talked to _____ Time & Date _____ |
| 6) ODH (5190)
Roger Suppes 888-1411 | Talked to _____ Time & Date _____ |
| 7) PIC (8508) Al Franks 263-0220 (home) | Talked to <u>Pat Morrison</u> Time & Date <u>0940 12/16</u> |
| 8) SFM (864-5510)
Don Ryan 471-4363 (home) | Talked to _____ Time & Date _____ |
| 9) <u>COHD</u> | Talked to <u>Steve Casali</u> Time & Date <u>110 12/16</u> |
| 10) _____ | Talked to _____ Time & Date _____ |

Received by Al Franks

Follow-up

Business _____ Yes _____ No _____
District X Yes _____ No _____

TSS Chem Yes _____ No X

DEC 22 1981 (11/70)

POLLUTION, INITIAL REPORT

Name of waters SECOND CREEK	Watershed Sandusky Bay	Section	Township Perkins	County Erie 22
Notice of pollution received (date and hour - method) 12-15-81 3:05pm radio		Arrived at scene (hour, day of week, month, year) Tues., 12-15-81 3:30pm		
Kind of investigation (check type) <input type="checkbox"/> Stream litter <input checked="" type="checkbox"/> No kill incident Fish kill <input type="checkbox"/> under \$25.00 <input type="checkbox"/> over \$25.00		Number of dead animals _____ value _____ (under \$25.00 only) Length of stream or area of lake affected _____		
Suspected pollution source (name and address of operation, person, municipality, etc.) Bechtel-McLaughlin Co., 3612 Milan Rd., Sandusky, Ohio 44870				

TYPE OF OPERATION	SUSPECTED KIND OF POLLUTANT
<input type="checkbox"/> Agribusiness (Elevators etc.) <input type="checkbox"/> Chemical Industries <input type="checkbox"/> Farms & Feedlots <input type="checkbox"/> Food & Kindred <input type="checkbox"/> Government <input checked="" type="checkbox"/> Industrial (mfg., metals, etc.) <input type="checkbox"/> Mining & Minerals <input type="checkbox"/> Municipal Water & Sewage <input type="checkbox"/> Paper Products <input type="checkbox"/> Petroleum (wells, storage, etc.) <input type="checkbox"/> Refuse Disposal <input type="checkbox"/> Pipelines <input type="checkbox"/> Transportation (kind) _____ <input type="checkbox"/> Utilities <input type="checkbox"/> Other (specify) _____ <input type="checkbox"/> Unknown	<input type="checkbox"/> Acids <input type="checkbox"/> Chemicals <input type="checkbox"/> Fertilizers <input type="checkbox"/> Food & Food Products <input type="checkbox"/> Leachate <input type="checkbox"/> Manures <input checked="" type="checkbox"/> Metals <input type="checkbox"/> Oils & Gasoline <input type="checkbox"/> Paper Wastes <input type="checkbox"/> Pesticides & Poisons <input type="checkbox"/> Sewage <input type="checkbox"/> Site Liquors <input type="checkbox"/> Silts & Solids <input type="checkbox"/> Soaps & Detergents <input type="checkbox"/> Thermal Effluents <input type="checkbox"/> Other (specify) _____ <input type="checkbox"/> Unknown
Specific agent or cause if known (also give product made, handled, grown or processed) Chromium and Chromate	
Pollutant entered (check) <input checked="" type="checkbox"/> Outfall <input type="checkbox"/> Ditch <input type="checkbox"/> Storm sewer <input type="checkbox"/> Wreck <input type="checkbox"/> Drainage <input type="checkbox"/> Field tile <input type="checkbox"/> Mine seep <input type="checkbox"/> Other _____	Stage of water <input type="checkbox"/> High <input checked="" type="checkbox"/> Low <input type="checkbox"/> Average
Date and hour pollution discharge started 12-15-81?? ceased 12-15-81??	Pollution discharge (check one) <input type="checkbox"/> Continuous <input type="checkbox"/> Periodic <input type="checkbox"/> Seasonal <input checked="" type="checkbox"/> Result of accident

WATER AND WASTEWATER SAMPLES	
Inplant of specific pollution agent labeled <input checked="" type="checkbox"/> X <input type="checkbox"/> Y <input type="checkbox"/> Z	Water samples collected 100 yards or more upstream from where suspected pollutant entered are labeled <input type="checkbox"/> No. 1 <input type="checkbox"/> 1A <input type="checkbox"/> 1B Water temperature here is _____ °F
Samples of waste before entering the water are labeled <input type="checkbox"/> No. 2 <input type="checkbox"/> 2A <input type="checkbox"/> 2B	Water temperature here is _____ °F
Samples collected at point just below where pollutant entered and mixed with water are labeled <input type="checkbox"/> No. 3 <input type="checkbox"/> 3A <input type="checkbox"/> 3B	Water temperature here is _____ °F
First water samples collected below point of mixing are labeled <input type="checkbox"/> No. 4 <input type="checkbox"/> 4A <input type="checkbox"/> 4B	Water temperature here is _____ °F
Second water samples collected below point of mixing are labeled <input type="checkbox"/> No. 5 <input type="checkbox"/> 5A <input type="checkbox"/> 5B	Water temperature here is _____ °F
<i>(continue information regarding additional samples on back of report)</i>	

Species of wild animals collected and tag numbers

Additional information Information was received that the water in the above named creek was green in color. Upon arrival, green substance was observed in creek, but did not appear to still be entering stream. Erie Co. Health Dept. notified. They investigated and in turn contacted OEPA and the IGSU Laboratory who sampled the water & found the polluting agent. No fish kill observed, however, ice covers most of the stream.

PREPARE SITUATION MAP ON REVERSE SIDE OF REPORT FOR EACH CASE

- DISTRIBUTION OF COPIES:
1. Wildlife Enforcement HQS
 2. District Enforcement
 3. O.E.P.A.
 - Division of Oil and Gas

RECEIVED
DEC 20 1981
OHIO EPA

Alan J. Kasper
(Signature of Investigator)
12-19-81

(Hour & Date Report Completed & mailed)



Bechtel-McLaughlin, Inc.

METAL FINISHING - - ELECTROPLATING
RUSTPROOFING - - INDUSTRIAL PAINTING

3612 Milan Road 625-3873
SANDUSKY, OHIO 44870



August 12, 1983

Commander
Ninth District Coast Guard
1240 E. 9th St.
Cleveland, Ohio 44199

Attention: F. H. Taylor

Re: MEP Case 09-1224-81

Dear Mr. Taylor:

On June 16th, we wrote to you that we had requested from The Ohio E. P. A. in Bowling Green, for additional information they had on file about this case.

We had not received the material we requested, and upon further investigation, we find that the forms were completed, per their request, but a cover letter was not submitted with the forms.

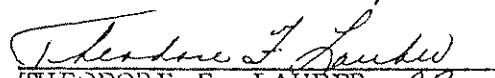
The discrepancy of 30,000 gallons of chrome and 30,000 gallons of treated water was discussed on the telephone with Darrell Fowler at OEPA, Columbus. (see pg. 21 of 22.)

Since this is all the information we are able to produce, if you wish to establish a hearing date, we will bring what material we have to the meeting and attempt to resolve the issue.

We would prefer an afternoon meeting, if it is convenient with you.

Sincerely yours,

BECHTEL-McLAUGHLIN, INC.


THEODORE F. LAUBER
President

TFL:jp

U.S. Department
of Transportation
United States
Coast Guard



Commander,
Ninth Coast Guard District

1240 E. Ninth St.
Cleveland, Ohio 44199
Staff Symbol: (dj)
Phone: (216) 522-2086

26 August 1983

16460/1.1
MEP CASE NO. 09-1224/81
UCN: V82 604 DP

Ohio EPA
Northwest District Office
1035 Devlac Grove Drive
Bowling Green, OH 43402
ATTN: Don Higgins

Dear Mr. Higgins:

This letter concerns a spill of chromic acid on 15 December 1981 at the Bechtel-McLaughlin facility in Sandusky, Ohio. I believe the Ohio EPA spill number is 12-22-2878.

According to the file, 30,000 gallons of 5% solution was spilled. Since the reportable quantity of chromic acid was exceeded, the company was cited for a violation of the FWPCA.

In presenting the facility's response, it was argued that evidence provided to your agency would show a discrepancy in the amount of chromic acid spilled from that alleged by the report. Bechtel-McLaughlin subsequently advised that the evidence-forms that they filed with your office, apparently were not available. However, as evidence that the chromic acid content of the spill was less than the 1,500 gallons reported, the company refers to a log entry (enclosed) of a comment reportedly made by Darrell Fowler, OEPA.

Since you investigated the spill I would appreciate it if you would advise me of how the number of gallons of chromic acid spilled was arrived at, how much of the spill actually reached water, and what should be concluded from Mr. Fowler's comment.

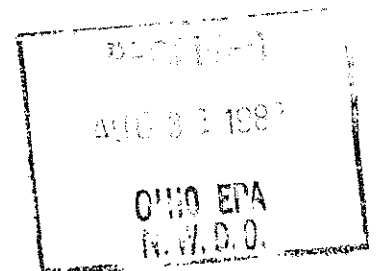
Sincerely,


F. H. TAYLOR

HEARING OFFICER

DERR

echtcl-McLaughlin ltr dtd 16 JUN 83
echtcl-McLaughlin ltr dtd 12 AUG 83
og Excerpt





IN ~~TE~~ OFFICE COMMUNICATION

not file Sept Co

TO: Distribution DATE: January 27, 1984
FROM: Jo Tom Carlisle, TA&WM Section, DHMM
SUBJECT: Bechtel McLaughlin Closure, #03-22-0598, OHD004182614

The above closure was a partial closure. The unit which was closed was a surface impoundment. The surface impoundment was included in the facility federal Part A filing and had interim status. The impoundment was not included in the state permit. Therefore, no modification to the state permit is required.

The original closure plan was submitted to U.S. EPA on May 4, 1983 and forwarded to Ohio EPA for processing on June 22, 1983. Public notice of closure was issued and no comments were received. The plan was reviewed by Ohio EPA and a revised closure plan submitted on September 16, 1983 was approved by the Director on September 29, 1983.

Closure was conducted and appropriate certifications of closure, dated December 30, 1983, were received at Ohio EPA on January 12, 1984.

The current status of the facility is generator and tank storage facility. P&MRS Section should officially notify the U.S. EPA of the facility's status as soon as possible.

TC/sc

Distribution: Tim Lawrence, ES, DHMM
Tom Crepeau, P&MRS, DHMM
Kate Wilson, NWDO

0047U

OHIO EPA
N. W. D. O.

Report on May 3, 1984 Inspection
Bechtel-McLaughlin, Erie County
03-22-0598/OHD004182614

Visited the referenced facility to (1) inspect closed surface impoundments, (2) inspect closed tanks, (3) verify operations and discuss accuracy of revised Part A. John Ohlemacher, Environmental Specialist, represented Bechtel-McLaughlin.

1. The area of the closed surface impoundment was fairly well graded, some ponding in the far west corner. John Ohlemacher stated that the area will be seeded as soon as the weather permits.

2. The five tanks removed from service are in a side driveway with other metal scrap. The rubber tank linings were torn and shredded by the backhoe used to scrape out the sludge. The tanks are visually clean of sludges and liquids. Certification of adequate closure has been received from the facility and a professional engineer.

3. The two tanks with hinged lids still in service are now located inside the shop adjacent to the barrel storage. Barrels and tanks were in good physical condition. Freeboard was not checked since wastes are cyanide bearing. There is not an adequate containment structure around the tanks. Note that the wastes in the tanks - F007 and F009 - are reactive and 3745-66-98 may apply.

The revised Part A permit, dated April 18, 1984, was discussed. Explanation of the process design capacity section:

S02: 4000 gallons - the volume of the two tanks to store F007 and F009, spent plating bath solutions and spent stripping and cleaning bath solutions.

S01: 30 yards - the volume of the roll off box receiving dewatered F006, wastewater treatment sludge.

S01: 55 gallons - drum storage of 55 drums of 55 gallons each. Sludge from plating baths, F008, and occasionally sludges from cleaning out the F007 and F009 tanks are drummed. Mr. Ohlemacher recalculated and changed the capacity of 3025 gallons.

The estimated annual quantities are comparable to the 1981 Annual Report values.

In summary, the closure of the F007 and F009 tanks has been certified as complete and visually the tanks are clean. The revised Part A, dated May 3, 1984, represents activities at the facility.

Katherine L. Wilson

Katherine L. Wilson
Geologist
5/14/84

cc: Ed Kitchen, CO
cc: Tom Carlisle, CO

Report on the March 8, 1983 Inspection
of Bechtel-McGlaughlin, Inc.
#03-22-0598, Erie County, Sandusky, Ohio

The inspection was performed to determine the status of Bechtel-McGlaughlin's sludge lagoon. The facility's federal hazardous waste permit has the sludge lagoon (S04) listed, however, the Ohio permit has that process crossed out as being "not used per telephone conversation with J. Ohlemacher 9/30/81," and the permit was issued December 29, 1981 without S04.

Kate Wilson of OEPA, NWDO, met with Critt Ohlemacher (Environmental Specialist for Bechtel-McGlaughlin) March 8, 1983, at the facility. Mr. Ohlemacher verified that the sludge lagoon had not been used after November 1980. He sent documentation March 14, 1983, enclosed. He said the firm wanted to retain the S04 listing, however, to ensure that the filter press (part of the wastewater treatment process) adequately handled the sludge, for emergency situations, and because they did not have the funds to spend on closure of the lagoon. He stated that Bechtel-McGlaughlin did not want the S04 listing removed from their Ohio permit and that they did not understand why it had been.

The lagoon held F006 metal hydroxide sludge. Cyanide was also present in the waste. An August 14, 1981 sample analysis is enclosed. Mr. Ohlemacher reports the process has not changed, so should represent the sludge constituents. Samples of the lagoon contents were recently taken which will provide a more accurate analysis of the present composition.

At the time of inspection, the 40' x 75' lagoon had approximately 2 feet of freeboard. The contents were a grey-green dry solid with some concrete blocks and debris. There is cover on the dikes and no evidence of overtopping breaks in the lagoon walls. Mr. Ohlemacher said the depth of dry sludge ranged

from 2 inches to approximately 1-1/2 feet. He reported the lagoon bottom is approximately 4 feet deep and contacts the top of limestone. There is no liner.

From reference materials it appears that the facility is located near the contact of the Olentangy and Ohio shales and the Columbus and Delaware limestones. DNR well logs show limestone at 6-9 foot depths approximately 1-1/2 miles west of the facility and at 42 foot depths the same distance to the east. District DPWS reports that wells in the area typically yield low quantities of water and that City and County public surface water supplies serve most of the area.

Bechtel-McGlaughlin has engaged Water Management, Inc., of Cleveland, Ohio, to prepare a closure plan for the sludge lagoon. This firm has obtained samples from the site. Enclosed is the letter indicating a tentative schedule for sampling, closure plan preparation and actual closure. Reportedly, Fondessy, who takes the metal hydroxide sludge now, will be the firm taking the lagoon contents when it is closed.

Also enclosed is a copy of a July 23, 1982 letter to the Regional USEPA requesting a postponement of groundwater monitoring requirements. Mr. Ohlemacher said they never received a response.

We will be awaiting USEPA's comments on this facility in order to coordinate our stance.

Katherine L. Wilson

Katherine L. Wilson
Environmental Scientist

KLW/kb

cc: Ed Kitchen, DHMM, CO, w/enc1.
cc: Kathy Homer, USEPA, w/enc1.



State Of Ohio Environmental Protection Agency

Northwest District Office
1035 Devlac Grove Drive; Bowling Green, Ohio 43402-4598

(419) 352-8461



Richard F. Celeste, Governor

Re: Erie County
Bechtel & McLaughlin, Inc.
Ohio EPA NPDES Permit No. 2IR00004

April 29, 1986

Mr. John K. Ohlemacher
Assistant Plant Manager
Bechtel & McLaughlin, Inc.
3612 Milan Road
Sandusky, OH 44870

Dear Mr. Ohlemacher:

Our review of the January, 1986 and February, 1986, monthly operating report for your facility revealed the following violations:

<u>Date</u>	<u>Outfall</u>	<u>Parameter</u>	<u>Value Reported</u>	<u>Value Permitted</u>
1/14/86	001	Total Zinc	1100 ug/l	1000 ug/l
1/14/86	001	Total Zinc	1.01 kg/day	1.0 kg/day
2/27/86	001	Free Cyanide	0.12 mg/l	0.06 mg/l
2/27/86	001	Free Cyanide	0.10 kg/day	0.06 kg/day
Mo. Avg.	001	Free Cyanide	0.069 mg/l	0.06 mg/l
2/3/86	001	Total Chromium	375 ug/l	300 ug/l
2/3/86	001	Total Chromium	0.35 kg/day	0.30 kg/day
2/3/86	001	Total Zinc	1200 ug/l	1000 ug/l
2/3/86	001	Total Zinc	1.11 kg/day	1.0 kg/day

We have noted your comments in the remarks section at the bottom of each report which explain these violations. Clarifier upsets were the cause of zinc and chrome violations, and a leaking tank in the plating line was the cause of the cyanide excursion. The company will be installing a sand filter during May, 1986 which is expected to alleviate these excursions in the future.

Please be advised that failure to comply with effluent limitations and/or monitoring requirements specified in your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.



State Of Ohio Environmental Protection Agency



Northwest District Office
1035 Devlac Grove Drive; Bowling Green, Ohio 43402-4598
(419) 352-8461

Richard F. Celeste, Governor

Re: Erie County
Bechtel-McLaughlin
Ohio EPA NPDES Permit No. 2IR00004

June 26, 1986

Mr. John K. Ohlemacher
Assistant Plant Manager
Bechtel & McLaughlin, Inc.
3612 Milan Road
Sandusky, OH 44870

Dear Mr. Ohlemacher:

Our review of the April, 1986, monthly operating report for your facility revealed the following violations:

Outfall 001

Table with 4 columns: Date, Parameter, Value Reported, Value Permitted. Rows show Total Chrome violations on 4/23/86.

We have noted your comment in the remarks section of the report. The cause of the chrome violation was not identified. The Dyna Sand filter was installed on June 11, 1986 and the company reports satisfactory operation of the unit so far.

Please be advised that failure to comply with effluent limitations and/or monitoring requirements specified in your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

Should you have any questions, please contact this office.

Sincerely,

Kathryn S. McKibben (handwritten signature)

Kathryn S. McKibben
Environmental Scientist

/eb

cc: Robert Phelps, Mgr., IWPC, CO



State Of Ohio Environmental Protection Agency

Northwest District Office
1035 Devlac Grove Drive; Bowling Green, Ohio 43402-4598

(419) 352-8461



Richard F. Celeste, Governor

Re: Erie County
Bechtel-McLaughlin, Inc.
Ohio EPA NPDES Permit No. 2IR00004

July 29, 1986

Mr. John K. Ohlemacher
Bechtel & McLaughlin, Inc.
3612 Milan Road
Sandusky, OH 44870

Dear Mr. Ohlemacher:

Our review of the May, 1986, monthly operating report for your facility revealed the following violations:

Outfall 001

<u>Date</u>	<u>Parameter</u>	<u>Value Reported</u>	<u>Value Permitted</u>
5-28-86	Total Copper	1100 ug/l	1000 ug/l max.

We have noted your comments in the additional remarks section on the operating report. The cause of the high copper result is unknown, but the June samples were down below the maximum limit again. The new Dyna Sand Filter was operational on June 11, 1986.

Please be advised that failure to comply with effluent limitations and/or monitoring requirements specified in your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

Should you have any questions, please contact this office.

Sincerely,

Kathryn S. McKibben
Kathryn S. McKibben
Environmental Scientist

/eb

cc: Robert Phelps, Manager, IWPC, CO
File



State of Ohio Environmental Protection Agency

Northwest District Office
1035 Devlac Grove Drive
Bowling Green, Ohio 43402-4598
(419) 352-8461

Richard F. Celeste
Governor

Re: Erie County
Bechtel-McLaughlin
Ohio EPA NPDES Permit No. 2IR00004

November 21, 1986

Mr. John Ohlemacher
Bechtel-McLaughlin, Inc.
3612 Milan Road
Sandusky, OH 44870

Dear Mr. Ohlemacher:

Our review of the September, 1986, monthly operating report for your facility revealed the following violations:

Outfall 001

<u>Date</u>	<u>Parameter</u>	<u>Value Reported</u>	<u>Value Permitted</u>
9/4/86	Total Copper	1230 ug/l	1000 ug/l
9/4/86	Total Copper	1.167 kg/day	1.0 kg/day
9/25/86	Total Copper	1300 ug/l	1000 ug/l
9/25/86	Total Copper	1.136 kg/day	1.0 kg/day

We have noted your comment in the additional remarks section concerning copper chelation. When the source is located and a solution to this problem has been identified, please inform our office of your findings.

Please be advised that failure to comply with effluent limitations and/or monitoring requirements specified in your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.



Bechtel-McLaughlin, Inc.

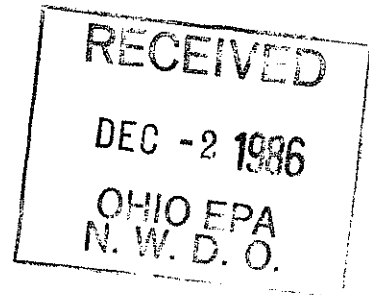
METAL FINISHING - - ELECTROPLATING
RUSTPROOFING - - INDUSTRIAL PAINTING

3612 Milan Road 625-3873

SANDUSKY, OHIO 44870

November 28, 1986

Kathryn S. McKibben
Div. of Water Pollution Control
Bowling Green, OH 43402



Dear Ms. McKibben:

This letter is in response to your letter dated November 21, 1986 concerning violations of Ohio EPA NPDES Permit No. 21R00004 for Total Copper. After several weeks of investigation and testing, we did find the source of our copper chelation problem. It was a Proprietary Addition Agent to the zinc plating baths. As a result, the chemical was taken out of the process. We at Bechtel-McLaughlin regret the problem occurred, but it was out of our control.

Should you have any further questions, please contact me.

Sincerely,

Mark Wm. Smith
Environmental Manager



State of Ohio Environmental Protection Agency

Northwest District Office
1035 Deviac Grove Drive
Bowling Green, Ohio 43402-4598
(419) 352-8461

Richard F. Celeste
Governor

Re: Erie County
Bechtel-McLaughlin, Inc.
Ohio EPA NPDES Permit No. 2IR00004

April 17, 1987

Mr. Mark W. Smith
Environmental Manager
Bechtel-McLaughlin, Inc.
3612 Milan Road
Sandusky, OH 44870

Dear Mr. Smith:

Our review of the February, 1987 monthly operating report for your facility revealed the following violations:

Outfall 001

<u>Date</u>	<u>Parameter</u>	<u>Value Reported</u>	<u>Value Permitted</u>
February	Total Cyanide	2 values missing	0.05 mg/l avg.
February	Total Recoverable Hexavalent Chromium	No values	Weekly monitoring

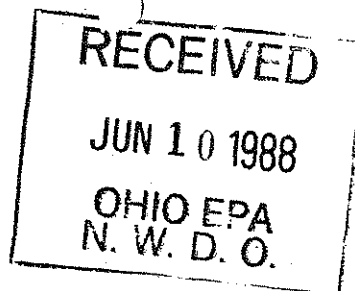
We are in receipt of your March 16, 1987 correspondence which reported the weekly monitoring results for total recoverable hexavalent chromium in February. We will have them added to your computer data file in Columbus.

We also received the semi-annual TTO report for your discharge on March 25, 1987. There was not a violation of the NPDES permit, however the result for tetrachloroethene was 250 ug/l. Please review your management plan and handling of this material. Steps should be taken to identify the source, and eliminate this from getting into the treatment system. Please inform us of your findings.

Please be advised that failure to comply with effluent limitations and/or monitoring requirements specified in your NPDES permit may be cause for enforcement action pursuant to Ohio Revised Code, Chapter 6111. If these violations continue to occur and if satisfactory progress is not made, it may be necessary to initiate enforcement action to achieve compliance.

Potential Hazardous Waste Site
Preliminary Assessment

Bechtel-McLaughlin, Inc.
3612 Milan Road
P.O. Box 1110
Sandusky, Ohio 44870
OH0004182614



Bechtel-McLaughlin, Inc., located at 3612 Milan Road, is situated just south of the City of Sandusky corporate limit and near a residential area. The site is an active RCRA and NPDES facility which has been in operation since 1945. They are a metal finishing operation which furnishes the following coatings to industry: Cu, Cr, Cd, Zn, Ni. Also, a waste treatment process is in operation at the facility to treat process wastewater.

Metal plating processes which use electroplating generate waste streams which are highly contaminated with metallic salts. Effort must be taken to remove these wastes for both environmental and financial reasons. The net results of the waste treatment process are a dewatered sludge high in heavy metal concentration plus an effluent with decreased levels of contamination. There has been extensive sampling of both the sludges and effluent by various labs and results confirm this contamination.

For an unknown period of time, Bechtel-McLaughlin disposed of their sludges in a surface impoundment on-site. This impoundment, along with several storage tanks (above-ground) used for spent plating/stripping solutions, were permitted under RCRA-Part A Interim Status. However, in November, 1983, this impoundment was excavated and closed. Also, five of the storage tanks were closed, leaving just two tanks in use. Bechtel-McLaughlin filed a revised Part A in May, 1984 to reflect these changes.

The effluent wastewater from the waste treatment process is discharged into Second Creek under NPDES Permit No. 21R00004*DD. Recently, there have been numerous violations of this permit, most likely because of hydraulic overload related to an increase in production from when the permit was originally issued. There have been several modifications of the original permit in an effort to assure compliance. Bechtel-McLaughlin also has an EIS (Emission Inventory System) Permit No. 0322020007 for a P-1 spray sealant booth with exhaust filters. To date, there have been no complaints or violations associated with this.

Drinking water for Sandusky and the surrounding area is supplied by municipal services, with intakes located in Lake Erie. There are no private wells in use in the immediate area of Bechtel-McLaughlin, and hence potential groundwater contamination does not appear to pose a threat to the population.

A low priority for FIT/State activities is recommended at this time. Although Bechtel-McLaughlin does handle and dispose of hazardous wastes, they are tightly regulated. As stated earlier, they operate under RCRA-Part A Interim Status as a generator and TSD, have an NPDES permit for wastewater discharge and have an EIS Permit for a spray sealant booth. Recommended actions would be to continue monitoring/inspecting of the facility to assure compliance with permits/regulations. Also, it might be appropriate to inspect any landfills that accepted waste sludges from Bechtel-McLaughlin in the past.

**North
Coast
Environmental, Inc.**

3200 West 65th Street - Suite 102 - Cleveland, Ohio 44102 - (216) 651-1710

September 30, 1991

Ohio EPA
N.W. District Office
1035 Deviac Grove Drive
Bowling Green, Ohio 43402

Attn: Mr. Rod Miller

Re: Bechtel McLaughlin Inc.

RCRA Closure Plan Final Report

RECEIVED

OCT 03 1991

OHIO E.P.A.
N.W.D.O.

Dear Mr. Miller:

Enclosed, please find the final closure report for the TSD facility owned and operated by Bechtel McLaughlin Inc. located at 3612 Milan Rd, in Sandusky, Ohio.

This report documents the closure of Storage Tanks # 1 & 2, Sludge Dumpster Pad, and drummed Cyanide Waste Area.

We appreciate the assistance the Agency has provided throughout this project. If you have any questions, please contact us.

Sincerely,



Greg E. Stayanchi
President

Final Closure Activities
For
Bechtel-McLaughlin, Inc.
Sandusky, Ohio

Submitted To:

US EPA
Region V
230 South Dearborn St.
Chicago, Illinois 60604
Attn: Ms. Lisa Pierard

Ohio EPA
P.O. Box 1049
1800 Watermark Drive
Columbus, Ohio 43266-0149
Attn: Mr. Tom Crepeau

Ohio EPA
N.W. District Office
1035 Devlac Grove Drive
Bowling Green, Ohio 43402
Attn: Mr. Rod Miller

Submitted By:

North Coast Environmental, Inc.
3200 W. 65th Street, Suite 102
Cleveland, Ohio 44102
Mr. Gary E. Engler, P.E.

September 30, 1991

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DECONTAMINATION EFFORTS

The Contractor who performed the site remediation was:

Metropolitan Environmental
P.O. Box 378
Celina, Ohio 45822

A. Waste Treatment Sludge Dumpster Pad

The only Clean-up and Decontamination required for this area involves the concrete pad (Refer to Drawing EL-1, 'Waste Treatment Sludge Dumpster Pad') and concrete apron. The concrete pad measures 50' X 15' while the concrete apron measures 7'6" X 10'. The total area involved is approximately 830 square feet.

Initially, the concrete pad and apron was scraped and vacuumed to remove any solid waste. Any solid waste removed in this manner, was placed back into the Sludge Dumpster for proper disposal.

Metropolitan utilized a high-volume drum vacuum equipped with a 3-stage filter system to recover and transfer dusts, vacuumable debris, and washwater. The vacuum's 3-stage filter system consisted of 1) Paper Filter Bag, 2) Dacron Filter, and 3) H.E.P.A. Filter (0.3 micron; 99.7% Effective).

Contaminants were prevented from spreading to the environment during scraping by immediately vacuuming and subsequent transfer to a drum or dumpster. The pressure washing effluent was contained by washing the pad only within a diked containment area. Liquid washings collected were transferred to the existing plant Waste Treatment system for complete treatment.

DECONTAMINATION EFFORTS (Continued)

Curbing was installed around the perimeter of the area to contain all wash and rinse solutions. Prior to placement of the Polyurethane foam berm around the concrete pad, Metropolitan removed the security fence around the area. This was done to eliminate any interferences and so that the pad was effectively cleaned.

Metropolitan used Polyurethane foam curbing to contain the generated washwater. Polyurethane foam packs were used to form a continuous watertight seal and berm around the pad. This effectively contained the washwater during the cleaning operations.

The concrete pad is 10" thick and is in excellent condition. No cracks extend through the concrete into the soil below the pad.

A 15% solution of Sodium Hypochlorite was applied to the surface. This concentration and strength of solution was more than adequate to oxidize any Cyanide present on the pad.

Sodium Hypochlorite can not be purchased above the 15 % concentration because it is classified as a licensed pesticide above this level. Therefore, the maximum concentration commercially available is 15 %, which is used commonly in all Industrial Waste Treatment systems utilizing liquid chlorine feeding equipment.

DECONTAMINATION EFFORTS (Continued)

On-site checks for free chlorine level in the rinse solutions were performed.

The concrete pad and apron were than pressured washed with an alkaline cleaning solution at approximately 2200 PSIG pressure. After the pressure washing, three (3) rinses did follow. The final rinse solution (Final Rinseate) was analyzed. The following Rinseate Clean Standard was not met after the first washing, the procedure was than completed a second and third time until all parameters were well within stated standards.

Public drinking water maximum contaminant level (MCL) for hazardous waste constituents as promulgated in 40 CFR 141.11 and OAC 3745-81-11 for inorganics and 40 CFR 141.12 and OAC 3745-81-12 for organics. If an MCL is not available, the MCLG as per 40 CFR 141.50 shall be used. If neither an MCL or MCLG is available, 1 mg/l will be used.

As such, the pad and apron were cleaned until the Final Rinseate meet the following Rinseate Clean Standards:

Total Cadmium-	0.01 mg/l
Total Chromium-	0.05 mg/l
Total Copper-	1.0 mg/l
Total Nickel-	1.0 mg/l
Total Zinc-	1.0 mg/l
Total Cyanide-	1.0 mg/l

All wash and rinse solutions were captured and transferred by high-volume vacuum unit equipped with 3-stage filter unit to the Bechtel-McLaughlin Waste Treatment system for full treatment.

DECONTAMINATION EFFORTS (Continued)

The complete Cleaning and Decontamination of the concrete pad was performed by Metropolitan Environmental. An independent Engineer, from North Coast Environmental, Inc., was on-site during Cleaning and Decontamination to certify the methods employed and to ensure that a Clean Level was achieved.

The Sludge Dumpster will not require Cleaning and Decontamination. After the previously described procedures were successfully accomplished, the Sludge Dumpster was returned to its normal service, i.e. collection of the dried F006 sludge from the existing Waste Treatment system.

B. Soil Sampling and Removal

North Coast Environmental, Inc. implemented the following sampling plan when collecting soil samples:

All samples were analyzed for the parameters of interest which are the following: Cadmium, Chromium, Copper, Nickel, Zinc, and Cyanide. Due to the potential influence of these contaminants on any ground water, all analyses were conducted on a Total rather than on a Leachable basis.

Samples were collected one foot from the dumpster pad as marked on Drawing EL-1. The samples were taken at points A, B, C, and D. These samples consisted of surface soil scraped using a stainless steel trowel.

These results proved to be less than those stated below therefore no further sampling was done.

B. Soil Sampling and Removal (Continued)

Sixteen (16) background samples were collected by collecting four (4) surface samples from each corner of the Bechtel-McLaughlin property. These samples were randomly collected and sampled as previously described.

All sampling equipment was decontaminated between each sampling event by performing the following procedure. Initially, all items were washed in a solution of Alconox and water. This was followed by a distilled water rinse and then a rinse with a 1 % Nitric Acid (HNO₃) solution. Because there are no organic contaminants of concern, a rinse with a polar solvent was not applied.

All samples were placed onto a disposal pie tin after collection. All samples were placed into a pre-cleaned Ichem sample jar (flint glass with Teflon lid). Each sample was independently labeled and logged to a chain - of - custody record, as with all samples taken during the course of the Modified Full Closure Plan.

B. Soil Sampling and Removal (Continued)

The Clean Level for the Bechtel-McLaughlin soil was defined as follows:

As all metals of concern at Bechtel-McLaughlin are naturally occurring elements in the soil, the following Clean Level will be met:

Soils containing naturally occurring elements or compounds in the area of the pad will be considered to be contaminated if concentrations in the soils exceed the mean of the background samples plus two (2) standard deviations. All metal analyses were for Total Metals.

C. Drummed Cyanide Waste

As can be seen from Drawings SP-1 and EL-2, the Drummed Cyanide Waste area adjoins the Waste Holding Tanks (Cyanide Stripper Solution) area. The Drummed Cyanide Waste and the Waste Holding Tanks rest on the same concrete floor inside of the Bechtel-McLaughlin plant. The total area measures 47' X 18'. The concrete floor, including the area under the two (2) Waste Holding Tanks, was fully Cleaned and Decontaminated.

There were approximately (12) drums on-site in this area. These drums were Manifested and properly disposed of. Therefore, the only Clean-up and Decontamination involved the concrete floor. This area measures 6' X 18', while the entire area involved, (including Cyanide Waste Holding Tanks area) measured 47' X 18'. The floor is 6" thick. The drums were properly labeled and disposed of prior to the Decontamination Process.

The entire floor area was scrubbed down with a Sodium Hypochlorite (Bleach) solution to oxidize any traces of Cyanide present. This was followed by a hot pressure wash. Polyurethane foam curbing was installed to contain all cleaning and rinse solutions. The floor area below both the drummed Cyanide waste and the two (2) liquid Cyanide tanks is 6" thick, in excellent condition, without any cracks extending into the soil below.

C. Drummed Cyanide Waste (Continued)

A 15 percent solution of Sodium Hypochlorite was applied to the floor. This concentration and strength of solution was be more than adequate to oxidize any Cyanide present on the floor.

Sodium Hypochlorite can not be purchased above the 15 % concentration. Above this level it is classified as a licensed pesticide. Therefore, the maximum concentration commercially available is 15 %, which is used commonly in all Industrial Waste Treatment systems employing liquid chlorine feeding equipment.

On-site checks for free chlorine level in the rinse solutions were performed.

After the pressure washing, three (3) complete rinses followed. The final rinse solution (final rinseate) was analyzed. This process was continued until all rinses met the Clean Standard listed below:

Total Cadmium-	0.01 mg/l
Total Chromium-	0.05 mg/l
Total Copper-	1.0 mg/l
Total Nickel-	1.0 mg/l
Total Zinc-	1.0 mg/l
Total Cyanide-	1.0 mg/l

The concrete floor was therefore considered to be 'Clean' when the Final Rinseate meet the requirements as stated above.

IX. DECONTAMINATION EFFORTS (Continued)

All wash and rinse solutions were captured and directed to the plating area Cyanide floor drain. The floor drain did convey the wash and rinse solutions to the Cyanide Collection Sump. The Cyanide Collection Sump is used to collect and provide flow equalization for the normal plant Cyanide rinsewaters generated by the plating lines. The combined solutions were then automatically pumped into the Cyanide Oxidation portion of the existing Waste Treatment system. Therefore, complete treatment of the wash and rinse solutions were efficiently provided by the existing Waste Treatment system. Any Cyanide present in the wash and rinse solutions were automatically oxidized by the existing Alkaline Chlorination system. Any metals present in the wash and rinse solutions were precipitated by the existing inclined plate Lamella Clarifier.

The complete Cleaning and Decontamination of the concrete floor was performed by Metropolitan Environmental. An Independent Engineer, North Coast Environmental, Inc., was on-site during the Cleaning and Decontamination procedure to certify the methods employed and to ensure that a Clean Level had been achieved.

DECONTAMINATION EFFORTS (Continued)

D. Cyanide Stripper Solution Tanks

The two (2) Cyanide Stripper Solution Tanks (please refer to Drawings EL-3 and EI-4) are fabricated from 1/4" thick carbon steel. In addition, each tank contains a 3/32" thick rubber lining for corrosion protection. The tanks are reinforced with 3" channel supports and a 2" rim flange.

A test for structural integrity will not be required as the tanks will be taken out of service and properly disposed of. The tanks will not be replaced. No inspection log was kept for these tanks. The tanks have never leaked during their usage at Bechtel-McLaughlin and there have been no spills in this area.

The Cyanide Stripper Solution Tanks rest on the same concrete floor as the Drummed Cyanide Waste (refer to Drawing EL-2, 'Drummed Cyanide Waste, Plan View'. Therefore, the entire floor was cleaned and decontaminated at the same time. The entire floor area involved, measures 47' X 18'. The actual method utilized was exactly as described under 'Drummed Cyanide Waste'.

D. Cyanide Stripper Solution Tanks (Continued)

The Cyanide Stripper Solution Tanks were Cleaned and Decontaminated in a manner very similar to the concrete floor area. Because the tanks are empty, no off loading of tank contents were required. The tanks were first filled with a tap water/Sodium Hypochlorite solution.

The existing mixers were utilized to thoroughly agitate the tanks for four (4) hours. This step was used to oxidize any remaining Cyanide residue present in the tanks.

The solution was then drained from each tank and sent to the plating area Cyanide floor drain. The solution flowed by gravity into the Cyanide Collection Sump. From here the solution was fully treated by the existing Waste Treatment System as described under 'Drummed Cyanide Waste'.

The tanks were than pressured washed with a Sodium Hypochlorite solution. After the pressure washing, three (3) complete rinses followed. The Final Rinseate was then analyzed. This process was repeated until the Final Rinseate met the following requirements:

Total Cadmium-	0.01 mg/l
Total Chromium-	0.05 mg/l
Total Copper-	1.0 mg/l
Total Nickel-	1.0 mg/l
Total Zinc-	1.0 mg/l
Total Cyanide-	1.0 mg/l

ANALYTICAL METHODS

All samples were analyzed in accordance with the latest edition of 'Test Methods For Evaluating Solid Waste', SW-846, published by the USEPA, Office of Solid Waste and/or 'Methods For Chemical Analyses Of Water And Waste', USEPA PB 84-128677.

Analytical Explanations

Date	Lab	Closure Area
March 20, 1991	TMA/ERG	Background Samples
June 4, 1991	TMA/ERG	Sludge Dumpster Pad Surrounding Area
August 27, 1991	Brookside Farms Lab Environmental & Industrial	
	IE16056	Cyanide Stripper Tank # 1
	IE16057	Sludge Dumpster Pad
	IE16054	Cyanide Stripper Tank # 2
	IE16055	Drummed Cyanide Waste Area
September 25, 1991	AA Labs Inc.	
	#1	Cyanide Stripper Tank # 1
	#2	Cyanide Stripper Tank # 2
	#3	Sludge Dumpster Pad
	#4	Drummed Cyanide Waste Area
September 30, 1991	AA Labs, Inc.	
	Floor	Drummed Cyanide Waste Area
	Pad	Sludge Dumpster Pad

TMA
Thermo Analytical Inc.

TMA/ERG

7777 Exchange Street
Cleveland, OH 44125-3337

(216) 447-0790

North Coast Environmental
3200 West 65th Street
Cleveland, Ohio 44102

Date: March 20, 1991

Attn: Mr. Greg Stayanchi

Date Collected: 02/14/91
Date Received: 02/15/91

TMA ID: 0188:01-16
CLIENT ID: See Below

<u>CLIENT ID</u>	<u>CADMIUM</u>	<u>CHROMIUM</u>	<u>COPPER</u>	<u>NICKEL</u>	<u>ZINC</u>	<u>CYANIDE</u>
1A	<0.4	13	18	11	61	<0.10
1B	<0.4	11	20	11	69	<0.10
1C	<0.4	12	19	11	66	<0.10
1D	<0.4	12	22	13	76	<0.10
2A	14	200	146	88	440	2.2
2B	14	200	142	86	469	1.6
2C	1.7	65	66	31	91	1.3
2D	3.6	104	71	46	104	0.79
3A	<0.4	6.5	7.5	6.5	24	<0.10
3B	<0.4	10	14	9.0	52	<0.10
3C	0.61	12	23	8.7	98	<0.10
3D	<0.4	8.9	23	8.7	77	<0.10
4A	2.2	15	145	21	403	0.21
4B	3.9	26	214	35	600	0.76
4C	<0.4	19	18	14	60	0.27
4D	3.7	27	319	45	794	0.13

Approved by: Howard Sanders
Howard Sanders
Laboratory Manager



TMA/ERG

7777 Exchange Street
Cleveland, OH 44125-3337

(216) 447-0790

North Coast Environmental
3200 West 65th Street
Cleveland, Ohio 44102

Date: June 4, 1991

Attn: Mr. Greg Styanchi

Date Collected: 04/25/91
Date Received: 04/26/91

TMA ID: 0559:01-08
CLIENT ID: See Below

<u>CLIENT ID</u>	<u>CADMIUM</u>	<u>CHROMIUM</u>	<u>COPPER</u>	<u>NICKEL</u>	<u>ZINC</u>	<u>CYANIDE</u>	<u>UNITS</u>
1A-6"	*4.0	32	18	12	160	0.15	mg/kg
1A Deep	3.8	44	33	47	222	0.31	mg/kg
2B 6"	<0.60	17	14	9.5	75	0.33	mg/kg
2B 12-18"	<0.60	13	13	6.6	69	0.17	mg/kg
2C 6"	1.7	25	18	16	113	0.26	mg/kg
2C 12-18"	<0.60	7	9.5	6.7	30	0.14	mg/kg
2D 6"	1.2	31	26	20	205	0.23	mg/kg
2D 12-18"	<0.60	23	23	15	89	0.45	mg/kg

Approved by: Howard Sanders
Howard Sanders
Laboratory Manager


BROOKSIDE FARMS LABORATORY ASSN. INC.
Environmental & Industrial Division
New Knoxville, Ohio 45871
(419) 753-2448
** ANALYSIS REPORT **

Metropolitan Environmental
P.O. Box 511
Celina, OH 45822

File Number: 60255
Date recv'd: 08/16/91
Date rept'd: 08/27/91

Attention: Mr. Pete Hinders

Lab Number		IE16056	IE16057
Description		003 CN HOLDING TANK RINSE H2O	004 ROLL-OFF AREA RINSE H2O
CADMIUM	mg/l	5.0	0.78
CHROMIUM-TOTAL (Cr)	mg/l	1.38	0.94
COPPER	mg/l	19.0	6.0
CYANIDES - TOTAL	mg/l	38.6	2.10
NICKEL	mg/l	3.06	0.51
ZINC	mg/l	6.74	3.29


Jeffrey P. Brachak
Division Coordinator

BROOKSIDE FARMS LABORATORY ASSN. INC.
Environmental & Industrial Division
New Knoxville, Ohio 45871
(419) 753-2448

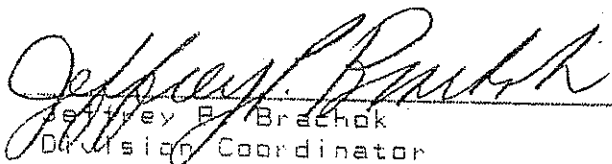
** ANALYSIS REPORT **

Metropolitan Environmental
P.O. Box 511
Celina, OH 45822

File Number: 60255
Date recv'd: 08/16/91
Date rept'd: 08/27/91

Attention: Mr. Pete Hinders

Lab Number		IE16054	IE16055
Description		001 CN HOLDING TANK RINSE H2O	002 CN HOLDING TANK RINSE H2O
CADMIUM	mg/l	4.09	2.63
CHROMIUM-TOTAL (Cr)	mg/l	6.50	13.9
COPPER	mg/l	25.0	6.70
CYANIDES - TOTAL	mg/l	0.84	< 0.02
NICKEL	mg/l	1.31	3.93
ZINC	mg/l	44.9	157


Jeffrey P. Brachok
Division Coordinator



ATOMIC ABSORPTION LABORATORY SERVICES
41345 SCHADEN ROAD, ELYRIA, OHIO
44035 216 324-6690

September 25, 1991

Northcoast Environmental
3200 W. 65 St.
Suite 102
Cleveland, Ohio 44102

Attn: Gary Engler

Re: Analytical results on samples I.D. Betchel McLaughlin.

Dear Mr. Engler:

We have completed our analysis on the above referenced sample. The results are as follows:

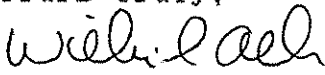
*

PARAMETER	1	2	3	4
CADMIUM	<0.01	<0.01	0.05	0.13
CHROMIUM	<0.02	<0.02	0.17	0.83
COPPER	0.17	0.17	0.41	1.78
NICKEL	0.03	<0.03	0.24	0.30
ZINC	0.04	0.05	1.24	1.03
CYANIDE	<0.01	<0.01	0.02	0.01

*All results are expressed in mg/l

Should you have any questions, please do not hesitate to contact us.

Yours truly,


William D. Allen
President

WDA/md



Northcoast Environmental
3200 W. 65 St.
Suite 102
Cleveland, Ohio 44102

ATOMIC ABSORPTION LABORATORY SERVICES
41345 SCHADEN ROAD, ELYRIA, OHIO 44035
(216)324-6690

September 30, 1991

Attn: Mr. Greg Stayanchi

Re: Analytical results on samples I.D. Betchel McLaughlin dated
9-27-91.

Dear Mr. Stayanchi:


We have completed our analysis on the above referenced samples. The
results are as follows:

* PARAMETER	FLOOR	PAD
CADMIUM	<0.01	0.01
CHROMIUM	0.02	0.04
ZINC	0.06	0.16

* All results are expressed in mg/l unless
otherwise indicated.

Should you have any questions, please do not hesitate to contact us.

Sincerely,

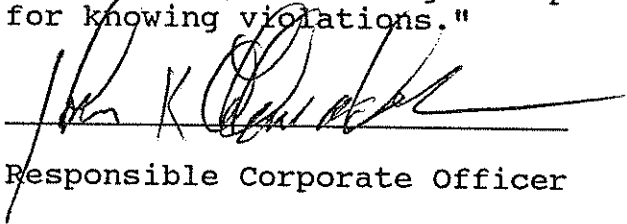

William D. Allen
President

WDA/md

CERTIFICATION OF CLOSURE

Owner/Operator

"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."

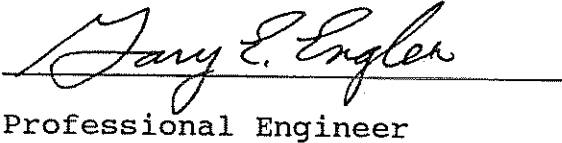


Responsible Corporate Officer

9/30/91
Date

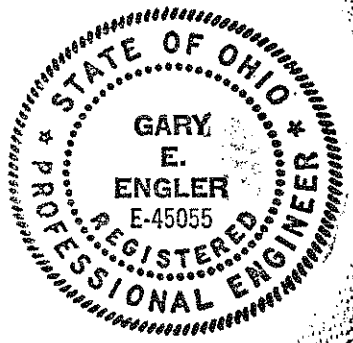
Registered Professional Engineer

"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."



Professional Engineer

9-30-91
Date





Bechtel-McLaughlin

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149

NEWS RELEASE

For Release: October 15, 1992

Contact: Jim Leach
(614) 644-2160

RECEIVED

OCT 15 1992

OHIO E.P.A.
N.W.D.O.

Bechtel-McLaughlin, Incorporated, a metal finishing business at 3612 Milan Road, Sandusky, has agreed to pay Ohio EPA a \$15,000 settlement for hazardous waste violations.

Among the violations found by Ohio EPA during a January 19, 1991 inspection were failure to: label and date hazardous waste containers; provide adequate training for employees involved with hazardous waste; transfer hazardous waste to containers in good condition; have a complete contingency plan which facility personnel could follow to respond to fires, explosions or unplanned sudden or non-sudden release of hazardous waste; provide secondary containment for tanks storing hazardous waste; ~~and document inspection of hazardous waste storage tanks.~~ A follow-up inspection on May 21, 1991 showed that some violations had not been corrected.

The facility closed its hazardous waste storage area in September 1991, in accordance with an Ohio EPA-approved closure plan; however, the company continues to generate hazardous waste which is shipped off-site for storage, appropriate treatment or disposal.



State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr.
Columbus, Ohio 43266-0149
(614) 644-3020
FAX (614) 644-2329

RECEIVED

APR 8 1993

George V. Voinovich
Governor

Donald R. Schregardus
Director

OHIO E.P.A.
R.W.D.O.

April 2, 1993

Re: Bechtel-McLaughlin, Inc.
US EPA ID No.: OHD004182614
Ohio ID No.: 03-22-0598
Completion of Closure

Bechtel-McLaughlin, Inc.
Attn: Mr. John Ohlemacher
PO Box 1110
Sandusky, Ohio 44870

Dear Mr. Ohlemacher:

According to our records, on October 26, 1990, the Director of Ohio EPA approved a closure plan submitted by Bechtel-McLaughlin, Inc. for their two (2) hazardous waste storage tanks and two (2) hazardous waste storage areas located at 3612 Milan Road, Sandusky, Ohio 44870. On October 3, 1991, Bechtel-McLaughlin, Inc. submitted to the Director certification documents stating that the two (2) hazardous waste storage tanks and two (2) hazardous waste storage areas had been closed according to the specifications in the approved closure plan. Ohio EPA District Office personnel requested additional certification documents on October 15, 1992 and received them before completing a certification of closure inspection and final review of documents on December 5, 1991. Based on this inspection and review, the Ohio EPA has determined that the two (2) hazardous waste storage tanks and two (2) hazardous waste storage areas have been closed in accordance with the approved closure plan and Rules 3745-66-12 through 3745-66-15 of the Ohio Administrative Code (OAC) and Bechtel-McLaughlin, Inc. will maintain the status of a generator of hazardous waste with less than ninety (90) day storage.

You should continue to use the identification number assigned to you for purposes of Ohio EPA manifest, recordkeeping, and reporting requirements as appropriate.

If you have any questions concerning your current status, please contact the Ohio EPA, Northwest District Office, Attn: Brent Kuenzli, 347 North Dunbridge Road, Bowling Green, Ohio 43402, telephone number (419) 352-8461.

As specified in OAC Rule 3745-66-40, Bechtel-McLaughlin, Inc. will not be required to maintain financial assurance for closure costs and liability coverage for accidental occurrences at this facility, in accordance with Rules 3745-66-43(H) and 3745-66-47(E) of the OAC.

Bechtel-McLaughlin, Inc.
Completion of Closure
Pg. 2

If you intend to no longer pursue your Ohio Hazardous Waste Facility Installation and Operation Permit and wish to withdraw your permit, the following information should be forwarded to Ohio EPA, Division of Hazardous Waste Management, Attn: Data Management Section at the letterhead address within thirty (30) days:

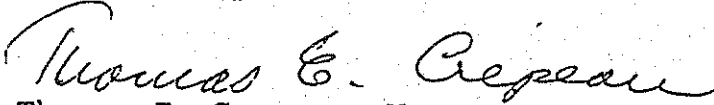
1. A formal request for withdrawal signed by an authorized representative according to Rule 3745-50-42(A-D) of the OAC (Enclosure 1) including a full explanation of your reasons for withdrawal of your application; and
2. A certification statement signed by the same authorized representative of your facility (Enclosure 2).

Upon receipt of the above items, Ohio EPA will review your submission along with any facility inspection report(s). If no additional information is necessary, your permit withdrawal request will be finalized.

Please note that this letter does not relieve you of any corrective action responsibilities that may be required.

Should you have any questions concerning this procedure, please contact Randy Sheldon, Division of Hazardous Waste Management, Data Management Section at the letterhead address or by telephone at (614) 644-2977.

Very truly yours,



Thomas E. Crepeau, Manager
Data Management Section
Division of Hazardous Waste Management

Enclosures

TEC/RS/ds

cc: Kevin Pierard, US EPA, Region V
Harriet Croke, US EPA, Region V
Hazardous Waste Facility Board
Randy Meyer, RCRA TAS, DHWM
Laurie Stevenson, HW ES, DHWM
Beth Barrett, DMS, DHWM
Mike Rath, DMS, DHWM
Brent Kuenzli, NWDO, DHWM



Bechtel-McLaughlin, Inc.

METAL FINISHING - - ELECTROPLATING
RUSTPROOFING - - INDUSTRIAL PAINTING

3612 Milan Road (419) 625-3873 FAX (419) 625-8979
SANDUSKY, OHIO 44870

RECEIVED

NOV 19 1996

OHIO E.P.A.
N.W.D.O.

Mr. Mike Gerber
Div. of Emergency & Remedial Response
OEPA, Northwest District Office
347 N. Dunbridge Rd.
Bowling Green, OH 43402

November 16, 1996


Re: Report for Ohio Incident #9610-22-4434
National Response Center Report #364-772

Dear Mr. Gerber,

Attached is the 30 day report you requested, regarding the discharge to Taylor Ditch that occurred on October 17, 1996. Thank you for your assistance in the resolution of this problem.

If you have any further questions, I may be reached at (419) 625-3873 x19.

Sincerely,


Crittenden J. Ohlemacher
VP Technical Operations

cc: Mr. William Walker, Erie County
Mr. Rick Zuzik, OEPA NW
National Response Center

November 16, 1996

SUMMARY:

At 4:30 p.m., October 17, 1996, Mike Gerber, Ohio EPA, informed us of a discharge through the storm sewer to Taylor Ditch at the Oakland Cemetery. It was determined that rinse water from the zinc phosphate process line must be getting into the storm sewer line through a series of broken tiles under the plant floor.

The process water to the Auto Phosphate and Double Barrel lines was promptly turned off to stop the flow. To further isolate the source, a plug was inserted into the storm sewer line outside the building. The captured water was pumped to our wastewater treatment plant.

Remediation efforts were begun immediately. Silt dams were constructed to prevent sediment from moving downstream. Using a spill clean up contractor and our own resources, the storm sewer was flushed from Bechtel McLaughlin and sediment in the ditch was vacuumed up. The collected water and sediment was processed through our wastewater treatment system. At 8:15 a.m., October 18, 1996, Mike Gerber, Ohio EPA, informed us that the remediation efforts were adequate and that the last silt dam could be removed.

The storm sewer line from the plant has been cemented closed. The floor drains in the front section of the plant, which are already disconnected from the process lines, will be cemented closed on November 29, 1996.

CHRONOLOGY:

October 17, 1996:

4:30 p.m. Critt Ohlemacher, Bechtel-McLaughlin, Inc., observed a group of people looking into a sewer on the west side of Milan Rd., approximately across the street from Bechtel-McLaughlin. He went out to see what was going on. Mike Gerber, Emergency Response Coordinator, Division of Emergency & Remedial Response, Ohio EPA, introduced himself and explained that they were tracing a discharge through the storm sewer to Taylor Ditch at the Oakland Cemetery. The discharge had been reported that morning and the city had taken samples prior to notifying OEPA. During this conversation, the storm sewers were checked on the east side of Milan Rd. at the fire hydrant and at the Bechtel-McLaughlin sewer meter building. The green-white material was observed at both locations.

Critt Ohlemacher informed Mike Gerber that approximately 1 1/2 weeks prior to that date someone from OEPA NW District, perhaps Rick Zuzik, had stopped by the facility. The OEPA representative stated that a small amount of a milky white discharge, similar to limestone dust from a parking lot, was observed coming from a storm sewer line at Oakland Cemetery. Critt Ohlemacher inspected the front of plant - no leaks were observed from the process lines. The parking lot on the south side of the building was checked - no water was flowing into the storm drain. The OEPA representative stated that Wagner quarry had pulled a sample and an analysis had been performed. Critt Ohlemacher asked the OEPA representative if it would be possible to have a copy of the results faxed in to compare with the process chemistries at Bechtel-McLaughlin. The OEPA representative replied that this should be possible, and was given one of Critt Ohlemacher's business cards, with the fax number. Critt Ohlemacher did not hear back from the OEPA representative and assumed that the source of the discharge had been located.

Critt Ohlemacher telephoned Chris Ohlemacher, Bechtel-McLaughlin, Inc., and advised him about the situation. Craig Ohlemacher, Bechtel-McLaughlin, Inc., arrived at the plant, was briefed, and telephoned Chuck Ohlemacher, Bechtel-McLaughlin, Inc.,

Based on the color of the material and the location of the storm sewer, Critt Ohlemacher hypothesized that phosphate rinse water must somehow be getting into the storm sewer line. Critt Ohlemacher escorted Mike Gerber on an inspection of the front of plant, including the Auto Phosphate and Double Barrel lines - no leaks were observed. At the same time, Mr. Patrick S. Carney, ODNR officer, took samples of water from the sewer access by sewer meter house. The samples were taken using Evian water bottles. Mr. Carney ran some analysis, but the results are not available. Critt Ohlemacher had the process water to the Auto Phosphate and Double Barrel lines turned off to try to stop the flow. The flow rate observed at the storm sewer access by the sewer meter building dropped significantly. Critt Ohlemacher took a sample at the storm sewer access by the sewer meter building and ran qualitative checks using Hach test kits. The results were negative for hexavalent chromium and positive for zinc.

Chris Ohlemacher arrived at the plant and was briefed. Chuck Ohlemacher arrived at the plant and was briefed.

5:00 p.m. Chris Ohlemacher contacted Mr. Robert (Bob) Hare, Pollution Prevention Associates, Inc., an environmental consultant who is familiar with our facility.

5:15 p.m. Critt Ohlemacher went with Mike Gerber to inspect Taylor Ditch and Pipe Creek. The discharge from the storm sewer was green-white with an estimated flow of several gallons per minute. A white precipitate was forming several feet downstream from the end of the pipe. This precipitate was present as a sediment on the bottom of the ditch and coated vegetation in the water and along the shore. The sediment was easily disturbed. Behind 1802 Merriweather Road, in Taylor Ditch prior to the confluence with Pipe Creek, the sediment was still apparent although there was not as much. At the confluence of Taylor Ditch with Pipe Creek, some sediment was perhaps present. Pipe Creek, north of Perkins Avenue, did not show any definitive evidence of the sediment.

5:30 p.m. Bob Hare arrived on the scene.

5:40 p.m. Chris Ohlemacher and Bob Hare observed that a steam line was still discharging a small stream of water to the phosphate line drain. This was turned off and all flow to the drain ceased.

6:15 p.m. A plug was inserted into the storm sewer line, at the sewer meter building, downstream from the access opening. An air operated pump was used to pump from the storm sewer to Bechtel-McLaughlin's wastewater treatment plant.

6:30 p.m. M.S.D.S. for phosphate line processes were provided to personnel.

6:30 p.m. A meeting was held to review the situation and the plan for remediation. Present at the meeting were:

Chris Ohlemacher, President, Bechtel-McLaughlin, Inc.
Chuck Ohlemacher, Vice President, Bechtel-McLaughlin, Inc.
Craig Ohlemacher, Sales Manager, Bechtel-McLaughlin, Inc.
Critt Ohlemacher, Vice President, Bechtel-McLaughlin, Inc.
Bob Hare, President, Pollution Prevention Associates, Inc.
Mr. Mike Gerber, Emergency Response Coordinator, OEPA.
Mr. Patrick S. Carney, Wildlife Officer, ODNR.
Mr. William L. Walker, Director, Erie County Emergency Management Agency.

Mr. Rick Ennis, Perkins Fire Department
Perkins Township Engineer (?), name not noted.
U.S. Coast Guard, 2 persons, names not noted.

The meeting began with a review of tasks completed. The remediation plan that was developing was reviewed and discussed. The resulting remediation plan was:

- 1) Continue pumping from the plugged storm sewer at Bechtel McLaughlin.
- 2) Construct silt dams to prevent sediment from moving downstream.
- 3) Use Bechtel-McLaughlin's gas powered sump pump to pump from the area between the storm sewer outfall and the first silt dam. The water and sediment is to be pumped to a tanker, probably from Wikel Bulk Express, and taken to Bechtel-McLaughlin for processing through the wastewater treatment system.
- 4) A spill clean up contractor will be hired to bring in vacuum trucks to help pickup the sediment.
- 5) The storm sewer will be flushed from Bechtel McLaughlin using the fire hydrant and the storm sewer access located near the hydrant.
- 6) A series of samples will be collected along the ditch and creek prior to the start of the clean up. Additional samples will be collected as needed to measure the effectiveness of the clean up.

While the meeting was in progress, Bob Hare began calling for a tanker and clean up contractor.

6:45 p.m. Bob Hare contacted Heritage Environmental and confirmed that they would be providing two vacuum trucks to support the cleanup at the ditch. ETA was 2.5 hours.

7:00 p.m. Chuck Ohlemacher left with a Bechtel-McLaughlin truck to pick up 30 bales of straw and a roll of silt screen for building silt dams.

7:00 p.m. Critt Ohlemacher called the Ohio EPA spill hotline, 1-800-282-9378, and spoke with Dispatcher Reeve. Dispatcher Reeve was given the Incident #9610-22-4434, informed that Mr. Mike Gerber, Div. of Emergency & Remedial Response, OEPA was on site, and was told that this was a facility notification.

7:10 p.m. Critt Ohlemacher called the National Response Center, 1-800-424-8802, and spoke with Mr. Koshar. Mr. Koshar was informed that the call was from the responsible party and that the incident had been brought to our attention by OEPA. He was informed that we had stopped the flow and that a spill clean up contractor was responding. He was also informed that we had notified the OEPA hotline, U.S. Coast Guard, county emergency coordinator, and that a state emergency coordinator was on-site. Mr. Koshar stated that a report number of 364-772 was assigned to this incident.

7:20 p.m. Critt went with Mike Gerber to collect samples from Taylor Ditch and Pipe Creek at several locations. One sample was taken from Taylor Ditch, several feet downstream from the confluence with the storm sewer outfall. (Result = 7.9 ppm zinc) This sample point was chosen to measure the effectiveness of the clean up.

7:30 p.m. Bob Hare contacted Mr. Don Dauch, Affiliated Environmental Services, regarding analysis of water samples. Mr. Dauch indicated that the lab personnel were scheduled out for the next several days and would not be able to provide analysis in the desired time frame.

7:45 p.m. Bob Hare contacted Mr. Rob McGregor, EC Labs, regarding analysis of water samples. Mr. McGregor indicated that the lab would be able to provide analysis in the desired time frame and that someone would pick up the samples in several hours.

8:00 p.m. Chuck Ohlemacher returned with bales of straw and a roll of silt screen for building silt dams.

8:15 p.m. Bob Hare visited the storm sewer discharge site and provided advice on pumping from the outfall to the tanker. Bechtel McLaughlin personnel began pumping from outfall to Wikel tanker using gasoline powered sump pump. A rigid sheet of plastic was used to temporarily dam the end of the storm sewer pipe.

8:30 p.m. Bechtel McLaughlin personnel constructed three silt dams. The first was built 10 feet from the end of the storm sewer pipe, prior to confluence with Taylor Ditch. The second was built a few feet upstream from the confluence with Taylor Ditch to prevent movement of contaminants upstream after the construction of the third silt dam. The third was built 6 feet downstream from the confluence with Taylor Ditch.

9:30 p.m. Heritage Environmental crew arrived at Bechtel McLaughlin and was sent to the ditch clean up site.

9:40 p.m. Vacuum trucks began working clean up site. It was discovered that it was difficult to pick up the sediment because it was very easily disturbed. By repeatedly sweeping the bottom, it was possible to remove a significant portion of the sediment.

10:00 p.m. EC Labs arrived at Bechtel McLaughlin to pick up water samples. At site, pH measurements were taken and chain of custody paperwork was completed.

11:20 p.m. EC Labs left Bechtel McLaughlin with water samples for analysis.

11:20 p.m. Mike Gerber (DERR) met with Bob Hare, Critt Ohlemacher, and Chris Ohlemacher, regarding work to be done. He indicated that the sewer flushing should be completed, then the areas segregated by the silt dams should be vacuumed to remove the majority of the precipitate. The silt dams should then be moved 10 to 15 yards downstream and the newly contained section dams should be vacuumed to remove the majority of the precipitate. If heavy rain set in, it would be necessary to remove the dams to prevent flooding. At daylight, the extent of sediment and the preliminary analytical results should be reevaluated for further clean up. Mike Gerber left the scene following this meeting.

October 18, 1996:

12:20 a.m. Bob Hare left site for the evening.

1:00 a.m. Began flushing storm sewer from the storm sewer access located near the fire hydrant. A 1.5 inch line from the fire hydrant was the source of the water. The flushing continued until the discharge at Taylor Ditch ran clear. The water was pumped into the vacuum trucks before the first silt dam.

1:45 a.m. Flushing of storm sewer was complete.

2:45 a.m. Pumping from the areas contained by the silt dams was halted. The majority of the sediment appeared to have been removed. In all, an estimated 21,000 gallons of water and sediment were removed. This material was and taken to Bechtel McLaughlin and processed through the wastewater treatment plant.

3:00 a.m. The silt dam at the storm sewer discharge was removed. The silt dam upstream from the confluence with Taylor Ditch was also removed. Because of the steady drizzle and sporadic heavy rain, the water level at the remaining silt dam was checked hourly.

3:00 a.m. Down spouts disconnected from storm sewer, inside and out.

5:00 a.m. Critt Ohlemacher inspected Taylor Ditch at several points from the storm sewer discharge to the confluence with Pipe Creek. There were some slight traces of sediment visible in Taylor Ditch, north of Milan Rd., and at the confluence with Pipe Creek.

6:00 a.m. One of the Heritage trucks was dismissed. It was felt that the remaining truck should be able to handle the any additional clean up. If not, another truck was only 2.5 hours away.

7:00 a.m. Critt Ohlemacher inspected Taylor Ditch at several points from the storm sewer discharge to the confluence with Pipe Creek. There were perhaps some slight traces of sediment visible in Taylor Ditch, north of Milan Rd., and at the confluence with Pipe Creek. There was less material visible than at the 5:00 a.m. inspection.

8:00 a.m. Critt Ohlemacher pulled a water sample Taylor Ditch, several feet downstream from the confluence with the storm sewer outfall. (Result = 0.1 ppm zinc)

8:00 a.m. Mr. William L. Walker stopped at Bechtel-McLaughlin and spoke with Chris Ohlemacher. Mr. Walker had just been at the storm sewer discharge to Taylor Ditch. He stated that the clean up looked acceptable to him and that he believed the last silt dam could be removed.

8:15 a.m. Chris Ohlemacher spoke by telephone with Mr. Gerber. Chris Ohlemacher reviewed what had been done and repeated Mr. Walker's observations and comments. Mr. Gerber concurred that the last silt dam could be removed. The remaining Heritage truck was dismissed.

8:30 a.m. Critt Ohlemacher pulled the last silt dam based on approval by Mr. William Walker and Mr. Mike Gerber. It was raining and there was about 3 inches of head above the dam. The straw and cloth from the dam were loaded onto a Bechtel-McLaughlin truck and returned to the facility.

Chris Ohlemacher spoke by telephone with the following OEPA surface water personnel to update them regarding the situation: Ms. Elizabeth Wick, Mr. Rick Zuzik, and Mr. Paul Brock.

Drain lines from Auto Phosphate rerouted above ground to wastewater treatment plant.

October 19, 1996:

Drain lines from Double Barrel rerouted above ground as a precaution.

October 21, 1996:

Wikel tanker clean out was finished. Water from clean out was put through wastewater treatment plant. Trailer was picked up by Wikel.

November 14, 1996:

The plug was still in the storm sewer line from Bechtel McLaughlin. The storm sewer line from Bechtel McLaughlin was cemented closed at the access opening near the sewer meter building.

To Be Done: November 29, 1996:

The floor drains in the front section of the plant, which are already disconnected from the process lines, will be cemented closed.

Personnel Involved:

Mr. Robert (Bob) Hare, President, Pollution Prevention Associates, Inc., Sandusky, Ohio.
Ronald (Chris) Ohlemacher, President, Bechtel-McLaughlin, Inc., Sandusky, Ohio.
Craig Ohlemacher, Sales Manager, Bechtel-McLaughlin, Inc., Sandusky, Ohio.
Charles (Chuck) Ohlemacher, Vice President, Bechtel-McLaughlin, Inc., Sandusky, Ohio.
Crittenden (Critt) Ohlemacher, Vice President, Bechtel-McLaughlin, Inc., Sandusky, Ohio.
Mr. Mike Gerber, Div. of Emergency & Remedial Response, OEPA, Northwest District Office, 347 N. Dunbridge Rd., Bowling Green, OH 43402
Mr. Patrick S. Carney, Wildlife Officer, ODNR, Findlay, Ohio.
Mr. William L. Walker, Director, Erie County Emergency Management Agency, Sandusky, Ohio.
Mr. Rick Zuzik, Division of Surface Water, OEPA, Northwest District Office, 347 N. Dunbridge Rd., Bowling Green, OH 43402
Mr. Rick Ennis, Perkins Fire Department
Perkins Township Engineer (?), name not noted.
U.S. Coast Guard, 2 persons, names not noted.

ID:312-353-4788

APR 08 '97 15:17 No.013 P.02



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

April 8, 1997

REPLY TO THE ATTENTION OF:
DRP-8J

Crittenden J. Ohlemacher
Vice President
Bechtel-McLaughlin, Inc.
3612 Milan Road
Sandusky, Ohio 44870

RE: Equivalency Demonstration
Bechtel-McLaughlin
OHD 004 182 614

Dear Mr. Ohlemacher:

On January 3, 1997, the United States Environmental Protection Agency (U.S. EPA) received your response to deficiencies regarding your Equivalency Demonstration for a closed surface impoundment at your site. In response to this, U.S. EPA would like clarify its recent proposal made to you for future dealings with your Equivalency Demonstration.

As you know, the main problem with your equivalency demonstration was the placement of background monitoring well MW-1. U.S. EPA will be unable to approve of your equivalency demonstration without monitoring results from either a new background well or using the results from an existing well up gradient of your operations building. The data supplied with your equivalency demonstration does not allow differentiation between contamination present in MW-1 as a result of operations conducted inside of the operations building or at or near MW-1 versus either existing background contamination present at your site beyond your control or contamination present in the closed surface impoundment.

In light of this, and understanding your predicament in the middle of this development, U.S. EPA proposes to allow Bechtel-McLaughlin to pursue a Voluntary Action Plan that would incorporate a facility-wide investigation of current conditions at your site. U.S. EPA envisions that monitoring results from a new background well will yield the information necessary for U.S. EPA risk assessors to make more fully informed decisions regarding any risk resulting from any contamination that may be present at the closed surface impoundment. U.S. EPA views this as a viable option that would preclude you from placing your financial resources into re-working the equivalency demonstration that would only provide both parties with a small part of the

ID:312-353-4788

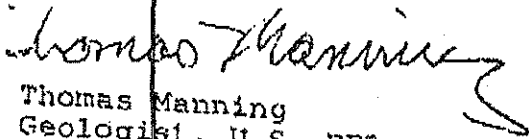
APR 08 '97 15:17 No.013 P.03

Crittenden J. Ohlemacher
Page 2
April 8, 1997

information that would be obtained from a facility-wide investigation. U.S. EPA would be able to conclude the matter of the equivalency petition and make a determination on post-closure needs for the surface impoundment and the investigation results would serve your needs as well.

If you have any questions regarding the content of this letter, please do not hesitate to call me at (312) 886-6943.

Sincerely,



Thomas Manning
Geologist, U.S. EPA



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, Ohio 43402
(419) 352-8461 FAX (419) 352-8468

George V. Voinovich
Governor

Re: Notice of Violation
Bechtel-McLaughlin, Inc.
OHD 004182614
Hazardous Waste
Erie County

October 15, 1998

Mr. Crittenden Ohlemacher
Vice President
Bechtel-McLaughlin, Inc.
3612 Milan Road
Sandusky, Ohio 44870

Dear Mr. Ohlemacher:

On August 21, 1998, the Ohio Environmental Protection Agency (Ohio EPA) conducted a hazardous waste compliance evaluation inspection of Bechtel-McLaughlin, Inc. located in Sandusky, Ohio. This inspection was conducted to determine Bechtel-McLaughlin's compliance with Ohio's generator regulations as adopted under Chapter 3745 of the Ohio Administrative Code (OAC). Bechtel-McLaughlin, Inc. was represented by Ronald Ohlemacher and yourself. The Ohio EPA was represented by the writer. The Agency's inspection included a tour of the facility and a review of written documentation.

Bechtel-McLaughlin, Inc. is a job shop metal finisher of miscellaneous parts. The facility performs zinc electroplating on carbon steel parts. Therefore, the wastewater treatment sludge generated at the facility is exempt from the F006 hazardous waste listing. Analytical data reviewed at the time of the inspection indicated that the wastewater treatment sludge does not exhibit any hazardous waste characteristics. Other wastes generated at the facility include spent plating bath solutions and plating bath sludge generated from the clean up of an abandoned plating line. This waste is treated in the facility's wastewater treatment system. The facility also generates spent chloride zinc bath solution and oil skimmings which are shipped off-site.

At the time of the inspection, Bechtel-McLaughlin was operating as a conditionally exempt small quantity generator of hazardous waste. However, as outlined in violation number 1 below, the facility is to evaluate several waste streams to determine if they are regulated wastes.

During the inspection, the following violations of Ohio's hazardous waste rules were observed and noted:

Mr. Crittenden Ohlemacher
October 15, 1998
Page 3

Please be advised that failure to comply with applicable hazardous waste rules may be cause for enforcement action by this Agency pursuant to Chapter 3734 of the Ohio Revised Code. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Please respond, in writing, to this Notice of Violation (NOV) within ten (10) days. Your response must include all actions and timetables necessary to demonstrate compliance.

Ohio EPA strongly encourages pollution prevention as the preferred approach for waste management. The first priority of pollution prevention is to eliminate the generation of wastes and pollutants at the source (source reduction). For those wastes or pollutants that are generated, the second priority is to recycle or reuse them in an environmentally sound manner. You can benefit economically, help preserve the environment, and improve your public image by implementing pollution prevention programs. For more information about pollution prevention, including fact sheets or U.S. EPA's "Facility Pollution Prevention Guide" (EPA/600/R-92/088), please contact the Ohio EPA Pollution Prevention Section at (614) 644-3469.

A copy of the completed inspection form is enclosed for your review. If you have any questions, please contact me at (419) 373-3055.

Sincerely,



Eric Getz

~~Division of Hazardous Waste Management~~

/csr

Enclosures

pc: Linda Neumann, DHWM, CO
Cindy Lohrbach, DHWM, NWDO
NWDO file



State of Ohio Environmental Protection Agency

Northwest District Office

347 North Dunbridge Road
Bowling Green, Ohio 43402-9398
(419) 352-8461 FAX (419) 352-8468

George V. Voinovich
Governor

Re: Return to Compliance
Bechtel-McLaughlin, Inc.
OHD 004182614
Hazardous Waste
Erie County

February 16, 1999

Mr. Crittenden Ohlemacher
Vice President
Bechtel-McLaughlin, Inc.
3612 Milan Road
Sandusky, Ohio 44870

Dear Mr. Ohlemacher:

On August 21, 1998, the Ohio Environmental Protection Agency (Ohio EPA) conducted a hazardous waste compliance evaluation inspection of Bechtel-McLaughlin, Inc. located in Sandusky, Ohio. The violation noted during this inspection was outlined in Ohio EPA's Notice of Violation (NOV) letter dated October 15, 1998. Bechtel-McLaughlin responded to this NOV through correspondence dated December 4, 1998.

As outlined in Ohio EPA's January 20, 1999 Partial Return to Compliance letter, Bechtel-McLaughlin remained in violation of Ohio Administrative Code 3745-52-11 for failure to evaluate the spent zinc chloride bath solution. The sample results submitted to this office with the December 4, 1998 response demonstrated that the zinc chloride bath solution contained 5 mg/kg of chromium. Therefore, the facility was required to evaluate the spent zinc chloride bath solution by testing a representative sample using the toxicity characteristic leaching procedure (TCLP) U.S. EPA Method 1311.

Bechtel-McLaughlin's response dated February 9, 1999 included a copy of analytical data and chain of custody documentation which demonstrate that the spent zinc chloride bath solution sampled does not contain chromium above 2 mg/kg. Therefore, this documentation is sufficient to correct this violation.

During our telephone conversation the week of January 25, 1999, you stated that the first test results received which indicated that the spent zinc chloride bath contained 5 mg/kg of chromium were not accurate possibly due to dirty sample containers. You stated that the plating process would have been affected if the zinc chloride bath contained 5 mg/kg of chromium. Therefore, the facility chose to resample the spent zinc chloride bath solution using totals instead of TCLP.

Bechtel-McLaughlin, Inc.

Electroplating

(419) 625-3873
Fax (419) 625-8979
3612 Milan Rd.
Sandusky, OH 44870

April 17, 2001

Mr. Ed Lim
OEPA Central Office
Lazarus Government Center
122 S. Front Street
Columbus, Ohio 43215

RE: Bechtel McLaughlin, Inc. / surface impoundment closure

Mr. Lim:

Bechtel McLaughlin, Inc. (BMI) received a certified letter, dated February 26, 2001, regarding the Director's request to modify their Hazardous Waste Facility Post-Closure Plan. The letter requested, pursuant to OAC 3745-66-18, that BMI modify its post-closure plan to implement the OAC Chapters 3745-54 and 3745-55 final ground water monitoring and response requirements as well as cap maintenance requirements. This letter is intended to fulfill our obligation to respond to your letter of February 26, 2001.

BMI's final discharge (F006 metal hydroxide sludge) to the surface impoundment occurred during the month of October 1979. Since the final discharge, BMI has consumed extensive resources in an effort to demonstrate closure and meet the evolving regulatory requirements imposed by the EPA & OEPA for two (2) decades. Below is brief history of the surface impoundment.

- 1979 BMI's final discharge to surface impoundment.
- 1983 Ohio EPA approves closure plan; Water Management, Inc., a BMI consultant, submits surface impoundment closure report.
- 1990 U.S. EPA request BMI obtain post-closure permit or demonstrate with 40 CFR Part 264 requirements for closure by removal and decontamination since BMI certified closure in December of 1983.
- 1991 BMI submits closure demonstration. / EPA denied closure demonstration.
- 1991 Protech Environmental Corp, a BMI consultant, submits Post-Closure Permit Application.
- 1994 U.S. EPA response letter finds Post-Closure Permit Application deficient.
- 1994 Pollution Prevention Associates & Haley & Aldrich, BMI consultants, submit revised Post-Closure Permit Application
- 1994 BMI request EPA not to process permit application. BMI chose equivalency demonstration.
- 1995 BMI submits equivalency demonstration.
- 1997 U.S. EPA denies equivalency demonstration and proposed BMI pursue Voluntary Action Program.

It is noted that the surface impoundment was located in area where bedrock exists only 4-5' below the surface. The initial closure conducted in the early 1980s excavated the surface impoundment area to the bedrock and disposed of impacted solids off-site. The equivalency demonstration completed in the mid-1990s identified further soil that may have been impacted, which was subsequently excavated to bedrock and disposed off-site. The equivalency demonstration was denied in 1997 due to several non-process contaminants present in a background monitoring well located up-gradient of the surface impoundment.

A record review was conducted on March 30th of this year. The record review uncovered several documents that bring into question the status of the unit. A document list and their significance are listed below for your review.

- a. Report on the March 8, 1983 Inspection of BMI. #03-22-0598, Erie County, Sandusky, Ohio

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APR 30 2001

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N.W.D.O.

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OHIO EPA

APR 23 2001

DIV OF HAZARDOUS

OHIO EPA

State of Ohio Environmental Protection Agency
Northwest District Office
347 North Dunbridge Road
Bowling Green, Ohio 43402
(419) 352-8461 FAX (419) 352-8468

INTER-OFFICE COMMUNICATION

TO: Shannon Nabors, Manager, DHWM-NWDO

FROM: Chad Zajkowski, Geologist 3, DDAGW-NWDO *CWZ*
through Geoff Leking, Geologist 4, DDAGW-NWDO *GL*

DATE: August 30, 2001

SUBJECT: RCRA Equivalency Demonstration, Bechtel-McLaughlin Incorporated, Erie County, Sandusky, Ohio, OHD 004182614. Document dated October 1995. Received by United States EPA October 13, 1995. Received by Ohio EPA January 26, 2001.

Introduction:

In October 1995, Bechtel-McLaughlin Incorporated (owner/operator) submitted a RCRA equivalency demonstration (submittal) as required by the United States Environmental Protection Agency (USEPA) to determine if closure activities of the surface impoundment unit in 1983, performed under 40 CFR 265 (Ohio Administrative Code (OAC) Chapter 3745-65 et seq.), meet the requirements of USEPA 40 CFR 264 (OAC Chapter 3745-54 et seq). As part of the demonstration to satisfy "clean" closure equivalency in ground water, BMI has installed four monitoring wells (one upgradient and three downgradient) in the vicinity of the former surface impoundment unit.

The Division of Hazardous Waste Management (DHWM) has requested that the Division of Drinking and Ground Waters (DDAGW) perform a review of the above referenced document to determine if contaminants detected in the uppermost aquifer are or are not associated with the former surface impoundment waste management operations.

Compliance Issues:

1. As detailed in Comment No. 1 a. and b. below, Ohio EPA recommends that the Director not approve the owner/operator's equivalency demonstration that a source other than the surface impoundment unit caused the elevated concentrations in upgradient monitoring well MW-1 during the September 1994 through July 1995 ground water monitoring program implemented to demonstrate "clean" closure equivalency.
2. The owner/operator should review comments 2, 4, 5, 6, 7, 8, 9, and 13 below and respond and/or provide the appropriate documentation to the agency to resolve the issues.
3. Comment No. 3, 10, 11, 12, and 14 are recommendations.
4. If the facility has any questions, please contact Chad Zajkowski, Division of Drinking and Ground Waters, Northwest District Office, Ohio EPA, at (419) 373-3097. All submittals should be sent to Shannon Nabors, Division of Hazardous Waste Management, Northwest District Office, Ohio EPA, 347 North Dunbridge Road, Bowling Green, OH, 43402.

Comments and Conclusions:

1. During the September 1994 through July 1995 ground water sampling and analysis program initiated at the unit to demonstrate "clean" closure equivalency, detectable concentrations above drinking water criteria's Maximum Contamination Levels (MCLs) were verified in both up and down gradient well monitoring well locations. Refer to the table below for constituents and concentrations above applicable MCLs. Concentrations that are at or exceed established applicable MCLs are in **bold print**.

Location/Date		Cadmium (mg/l)	Nickel (mg/l)	Tetrachloroethene (mg/l)
MCL (mg/l)		0.005	0.1	0.005
MW-1	09/29/94	0.150	0.935	0.316
	01/19/95	0.7	3.5	0.670
	04/07/95	0.3	2.1	0.430
	07/12/95	0.650	2.400	0.240
MW-2	09/29/94	<0.010	0.096	0.0087
	01/19/95	<0.1	0.1	<0.005
	04/07/95	<0.1	0.1	0.006
	07/12/95	<0.0100	0.107	<0.005
MW-3	09/29/94	<0.010	0.137	<0.005
	01/19/95	<0.1	<0.1	<0.005
	04/07/95	<0.1	0.1	<0.005
	07/12/95	<0.0100	0.117	<0.005
MW-4	09/29/94	<0.010	0.046	0.0065
	01/19/95	<0.1	<0.1	<0.005
	04/07/95	<0.1	<0.1	<0.005
	07/12/95	<0.0100	0.061	<0.005

As can be seen from the above table, monitoring well MW-1 (upgradient) exceeded the MCLs for cadmium (0.005 mg/l), nickel¹ (0.1 mg/l), and tetrachloroethene (0.005 mg/l) for all four sampling events except nickel during the 09/29/94 event which was only slightly below the then viable MCL. Monitoring well MW-2 (downgradient) was at or exceeded the former MCL for nickel during the 01/19/95, 04/07/95, and 07/12/95 sampling events and exceeded the MCL for tetrachloroethene during the 09/29/95 and 04/07/95 sampling events. Monitoring well MW-3 (downgradient) was at or exceeded the former MCL for nickel during the 09/29/94, 04/07/95, and 07/12/95 sampling

¹ MCL for nickel remanded from contaminants regulated under the Safe Drinking Water Act in 1995.

events. Monitoring well MW-4 (downgradient) exceeded the MCL for tetrachloroethene during the 09/29/94 sampling event. Though not listed in the above table, it should also be noted that zinc concentrations in all monitoring wells exceeds the secondary drinking water standard of 5 mg/l.

The October 1995 Equivalency Demonstration (submittal) documents Bechtel-McLaughlin Inc.'s (owner/operator) equivalency demonstration for the purposes of "clean" closure. This submittal provides for a demonstration(s) that a source other than a regulated unit caused the elevated levels of contamination in both the upgradient and downgradient monitoring well locations. The intent of the equivalency demonstration was to determine if contaminants were present in ground water at levels greater than relevant drinking water criteria, or those observed in the upgradient well.

The October 1995 submittal indicates that the owner/operator's demonstration for ground water equivalency is based on the following rationale. For ease of discussion, these rationale have been labeled "a." and "b.".

- a. **"The impact of the unit activities/constituents on groundwater was evaluated by comparing downgradient groundwater quality to MCL's. All detected constituents in the downgradient wells were below MCL's with the exception of tetrachloroethene (PERC) and nickel which were only slightly above the MCL's and were significantly less than upgradient concentrations of these constituents."** Though all detected constituents downgradient from the former surface impoundment unit (unit) were below relative MCLs except for PERC and nickel, the detection limit reported for methylene chloride (added to the contaminants regulated under the Safe Drinking Water Act in 1992) for all four sampling events was above its MCL of 0.005 mg/l. In addition, the detection limits for lead, arsenic, and selenium during the 01/19/95 and 04/07/95 sampling events for all four monitoring well locations were above their respective MCLs. Further, hexavalent chromium was not sampled during the January 19, April 7, and July 12, 1995 sampling events. Therefore, not all target analyte constituents were analyzed or analyzed below their respective MCLs. It should also be noted that field measurements for pH and conductivity were not collected during the January 19, 1995 and April 7, 1995 sampling events. Also, conductivity was not collected during the July 12, 1995 sampling event. Given this, the rationale noted in bold above does not demonstrate equivalency.

- b.** "In addition, a comparison of upgradient groundwater quality (MW-1) to downgradient groundwater quality (MW-2, MW-3, and MW-4) indicated all detected constituents concentrations in the downgradient wells were less than the upgradient well. Therefore, equivalency is demonstrated for groundwater, since levels of detected short listed constituents for each downgradient well for each quarter, were consistently reported below MCLs and levels observed in the upgradient well (Table 2)." This, in part, is a true statement. All detected constituents concentrations in the downgradient wells were less than the upgradient monitoring well (MW-1). However, not all target analyte constituents were analyzed during all sampling events and certain constituents detection limits were reported above their respective MCLs (See Comment 1a.). In addition, since the ground water monitoring program was installed prior to the soil investigation to delineate "hot-spots" outside the former limits of the unit, it appears that upgradient monitoring well MW-1 may be located within residual waste caused as a result of the operations/activities of the unit and may not represent the quality of background water that has not been affected by leakage from the unit. As indicated by the owner/operator in the submittal with regards to the extent of the soil "hot-spot" areas, "The exact site operations that caused the elevated concentrations of target analyte metals in these areas is unknown, but were assumed to be from the surface impoundment because of their proximity to the impoundment and because the constituents are identical to those formerly discharged to the impoundment".

Since the source of contamination (surface impoundment area) was initially removed in 1983, it would stand to reason that the constituent concentrations in downgradient monitoring wells (MW-2, MW-3, and MW-4) may have decreased, due to natural attenuation or the removal of the leaching source, after a period of approximately 10 years. Whereas the concentrations of target analytes observed in upgradient monitoring well MW-1, based on its proximity to the former surface impoundment unit, may be associated with contaminated residual soil not removed during the initial excavation activities. As such, the potential exists for leaching from soil to ground water at the soil/bedrock interface and/or temporal ground water fluxuation influences in contact with contaminated soil. This, as well as the relatively low horizontal ground water velocity (0.15 ft/yr to 0.3 ft/yr)

documented in the equivalency demonstration may be the cause of the elevated constituents at this location. Given this, the rationale noted in bold above does not demonstrate "clean" closure equivalency.

The owner/operator's submittal does not provide sufficient information necessary to document that the operations of the surface impoundment unit has not affected ground water quality within the vicinity of the unit for purposes of "clean" closure. Data currently exists which appears to indicate that ground water has been adversely impacted by historical waste-handling activities at the unit. The owner/operator's rationale that the unit is not contributing contamination to the ground water based on an alternate source was not adequately demonstrated. Therefore, provided below is a discussion of the options afforded to BMI.

Monitoring well MW-1 appears to be installed within the limits of impacted residual waste from the surface impoundment unit. Ohio EPA recommends BMI install, at a minimum, one additional monitoring well, in accordance with OAC 3745-54-90 through 55-02, further upgradient (south of monitoring well MW-1) to provide additional information to demonstrate the possibility of an alternate source. Further, since numerous target constituents (i.e., methylene chloride, lead, arsenic, selenium, and hexavalent chromium) were either not analyzed or were analyzed above their respective MCLs, Ohio EPA recommends that along with the new upgradient monitoring well location(s), the owner/operator shall sample all wells for target analytes in accordance with OAC 3745-54-90 through 55-02. This additional demonstration information shall be submitted as an amended equivalency demonstration to Ohio EPA for review and concurrence.

If an alternate source cannot be adequately demonstrated, as there is current evidence of onsite ground water contamination, the owner/operator shall consult with Ohio EPA to determine the need for installing additional wells further downgradient, and possibly upgradient, of the unit. The purpose of these wells will be to determine the horizontal and vertical rate and extent of ground water contamination and will be required to implement a ground water monitoring program. As such, the owner/operator shall submit for review and approval, a detailed ground water monitoring plan (GWMP) and sampling and analysis plan (SAP) which adhere to the requirements of OAC Rules 3745-54-90 through 55-02. Once the owner/operator has adequately implemented a GWMP per the above rules, and have collected an appropriate amount and type of ground water data, then they may attempt to demonstrate clean closure of the unit via the ground water pathway by performing a human health risk assessment. In order to satisfactorily complete clean closure of the unit via a risk assessment, BMI

must have removed enough contaminated soil and saturated subsoils to document that the concentration levels of hazardous waste constituents remaining in ground water do not exceed Agency established chronic health levels and that the residual contaminant levels remaining in the soil will not contribute to any future contamination of ground water.

If the risk assessment demonstration fails to be protective of human health and the environment, then the owner/operator will be required to close the unit as a landfill and perform 30 years of post closure ground water monitoring . The owner/operator shall submit a detailed ground water monitoring plan (GWMP) and sampling and analysis plan (SAP) which adhere to the requirements of OAC Rules 3745-54-90 through 55-02. Long term ground water monitoring will continue until final closure of the unit is certified by Ohio EPA.

General Comments to Section 3-02 and 3-04 A & B

2. On page 7 of the submittal the owner/operator states, "H&A conducted four rounds of groundwater monitoring for the four DEMO wells during September 1994, October 1992, January 1993, and April 1993, in accordance with the procedures attached in Appendix C".

According to Figures 3 through 6 and Table 2 (Summary of results of Groundwater Analyses) ground water monitoring activities were performed for purposes of the demonstration on September 29, 1994, January 19, 1995, April 07, 1995, and July 12, 1995. BMI should clarify the above statement.

3. On page 12 of the submittal the owner/operator states, "The hydraulic conductivity value for the overburden/top-of-bedrock interface zone as determined by rising head slug testing at MW-4 is $1.4E-06$ cm/sec (0.004 ft/day)". The owner/operator further states, "Horizontal groundwater velocity through the upper bedrock flow zone is calculated to range from 0.0004 to 0.0008 ft./day (0.3 ft/yr) given the range in gradients."

Hydraulic conductivity determined using slug tests are only representative of the material in the immediate vicinity of the well, therefore, a slug test at a single location on the property is not very useful for site characterization. Unless other slug tests are performed in the same zone, properties such as heterogeneity and isotropy cannot be determined. Since the owner/operator only conducted a slug test at monitoring well location MW-4 to determine hydraulic conductivity, the horizontal ground water velocity that the owner/operator calculated as 0.3 ft./yr

through the upper bedrock may not be representative of site conditions. Therefore, Ohio EPA recommends that in order to characterize horizontal ground water flow velocities around the vicinity of the unit the owner/operator should perform slug test analysis on all monitoring well locations and determine a range of horizontal ground water flow velocities based on this new data.

4. Figure 2 "Subsurface Exploration Plan" of the submittal displays locations of soil borings and monitoring wells. However, background soil borings SB-11 through SB-22 are not identified on this plan. In order to accurately characterize the geologic conditions beneath the facility all data collected during the equivalency demonstration should be included in the submittal. The owner/operator should include the locations of background soil borings SB-11 through SB-22 on Figure 2 and submit this information to Ohio EPA for review and comment.
5. Figure 3 "Site Plan Showing GroundWater Elevations (9/29/94)" of the submittal shows the 595.0 foot ground water elevation contour upgradient of monitoring well MW-1. It appears that the 595.0 contour has been improperly placed. Since monitoring well MW-1 has a ground water elevation of 595.07 and monitoring well MW-3 has a ground water elevation of 593.21, the 595.0 contour should be placed downgradient of monitoring well location MW-1.
6. To demonstrate that a site has been adequately characterized all raw data collected during field activities should be included in the submittal. Appendix D "Test Boring Reports" does not contain the boring logs for SA-1 through SA-12. The owner/operator should submit soil boring logs SA-1 through SA-12 to Ohio EPA for review and comment.
7. Appendix I of the submittal displays photograph numbers 1 through 4. Photograph number 4 shows a view of the excavation looking north near the end of the "hot-spot" excavation. The labeling notes the exposure of a water line resting on a shallow bed of gravel along the top of the bedrock. Since the water line could have been a potential pathway for migration of contaminants away from the surface impoundment unit, it's location as well as all other underground utilities, should be included in Figure 7. The owner/operator should modify Figure 7 to include all underground utilities and submit the modified figure to Ohio EPA for review and comment.

8. On the laboratory report provided by Environmental Control Laboratories, Inc. (E.C. Lab # 94100307-1) for samples collected from monitoring well MW-1 on September 29, 1994, the surrogate 1,2-Dichloroethane-d4 was above acceptable range due to matrix interferences. Therefore, any detected volatile target compounds should be considered approximate and qualified with a "J".
9. In the analytical results provided by Environmental Control Laboratories, Inc. (E.C. Lab #94100307-5) the trip blank associated with the September 29, 1994 sampling event reported tetrachloroethene at 7.4 $\mu\text{g}/\ell$. In Accordance with the RCRA ground-water monitoring technical enforcement guidance document (September 1986), any contaminants found in the trip blanks should be noted, and if the levels are within an order of magnitude when compared to the field sample results, the owner/operator should resample the ground water.

The analytical results provided by Environmental Control Laboratories, Inc. reports tetrachloroethene at monitoring wells MW-2 and MW-4 at concentrations of 8.7 $\mu\text{g}/\ell$ and 6.5 $\mu\text{g}/\ell$, respectively. Both of the referenced monitoring wells are within an order of magnitude from the concentration reported in the trip blank and, therefore, should have been resampled.

10. On page 7 of the submittal the owner/operator states, "H&A conducted four rounds of groundwater monitoring for the four DEMO wells during September 1994, October 1992, January 1993, and April 1993, in accordance with the procedures attached in Appendix C". Page 30 of Appendix C (Soil and Groundwater Sampling and Analysis Procedures) the owner/operator states, "A duplicate analysis will be performed for every analytical batch or at a minimum of 10 percent of all project samples analyzed by the contract laboratory."

First, refer to Comment 2. Secondly, Ohio EPA interprets the term "every analytical batch" as meaning per sampling event. According to the analytical results provided by Environmental Control Laboratories, Inc. duplicate blanks were only collected during the April 7 and July 12, 1995 sampling events. Duplicate samples are important to assure quality assurance/quality control. In the future Ohio EPA recommends that the owner/operator follow procedures stated in their plan and collect a duplicate sample per sampling event.

11. On page 7 of the submittal the owner/operator states, "H&A conducted four rounds of groundwater monitoring for the four DEMO wells during September 1994, October 1992, January 1993, and April 1993, in accordance with the procedures attached in Appendix C". Page 32 of Appendix C (Soil and

Groundwater Sampling and Analysis Procedures) the owner/operator states, "Internal quality control checks include analysis of equipment blanks used to validate successful equipment cleaning activities. The frequency of this activity will be once per week or sampling event (whichever is less) for each sampling procedure/device..."

First, refer to Comment 2. Secondly, according to the analytical results provided by Environmental Control Laboratories, Inc. equipment blanks were not collected during any sampling event associated with the equivalency demonstration except a filter blank collected during the July 12, 1995 sampling event. In the future Ohio EPA recommends that the owner/operator follow procedures stated in their plan and collect an equipment blank per sampling event.

12. The RCRA ground-water monitoring technical enforcement guidance document (September 1986) states that a chain-of-custody is a record to establish and provide documentation to trace sample possession from initial sample collection to final laboratory analysis. As such, a chain-of-custody should document all information necessary to account for each sample including temperature of cooler upon receipt by the contract laboratory. The chain-of-custody for all sampling events conducted to demonstrate equivalency do not document temperature of cooler or preservation techniques, therefore, there is no certainty that the samples were handled and preserved properly. In any future data submittals, Ohio EPA recommend the owner/operator follow appropriate chain-of-custody documentation.

13. In the report narrative for the samples collected July 12, 1995 it states, "The requested analytes for this project were not the only compounds found to be present in the samples. Chart #1 details the samples, analytes and analytical results for target and nontarget analytes."

Chart #1 was not contained in Appendix F. In order to make an informed determination regarding the possibility of an alternate source, all information should be submitted for review. Therefore, Ohio EPA request Chart #1 be submitted for review and comment.

14. In order to validate analytical data Ohio EPA recommends that in any future analytical data submittals, the owner/operator include laboratory quality assurance/quality control results as indicated in Appendix C of the submittal.

Shannon Nabors, DHWM-NWDO
Bechtel-McLaughlin Inc.
August 30, 2001
Page 11

ec: Shannon Nabors, DHWM-NWDO
pc: Jeff Patzke, DDAGW-CO
DDAGW-NWDO File

ID: 5000001065

g:\dhwm\BM\equivdemo.wpd

APPENDIX F

Records and Correspondences

Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Cleve Brown FIRM: ODNR Division of Water
FAX NO: 614-265-6767 HULL PROJECT CODE: HEM078
DATE 11/13/02 TIME: _____
RE: Well Log Search

Number of Pages (Including Cover Sheet) 3

THESE ARE TRANSMITTED:

For Your Use As Requested For Approval
 For Review & Comment For Your Information

The original of this facsimile will will not be sent to the recipient.

Notes: Mr. Brown

Please conduct a well log search with in a half-mile radius around attached site.

Thank you.

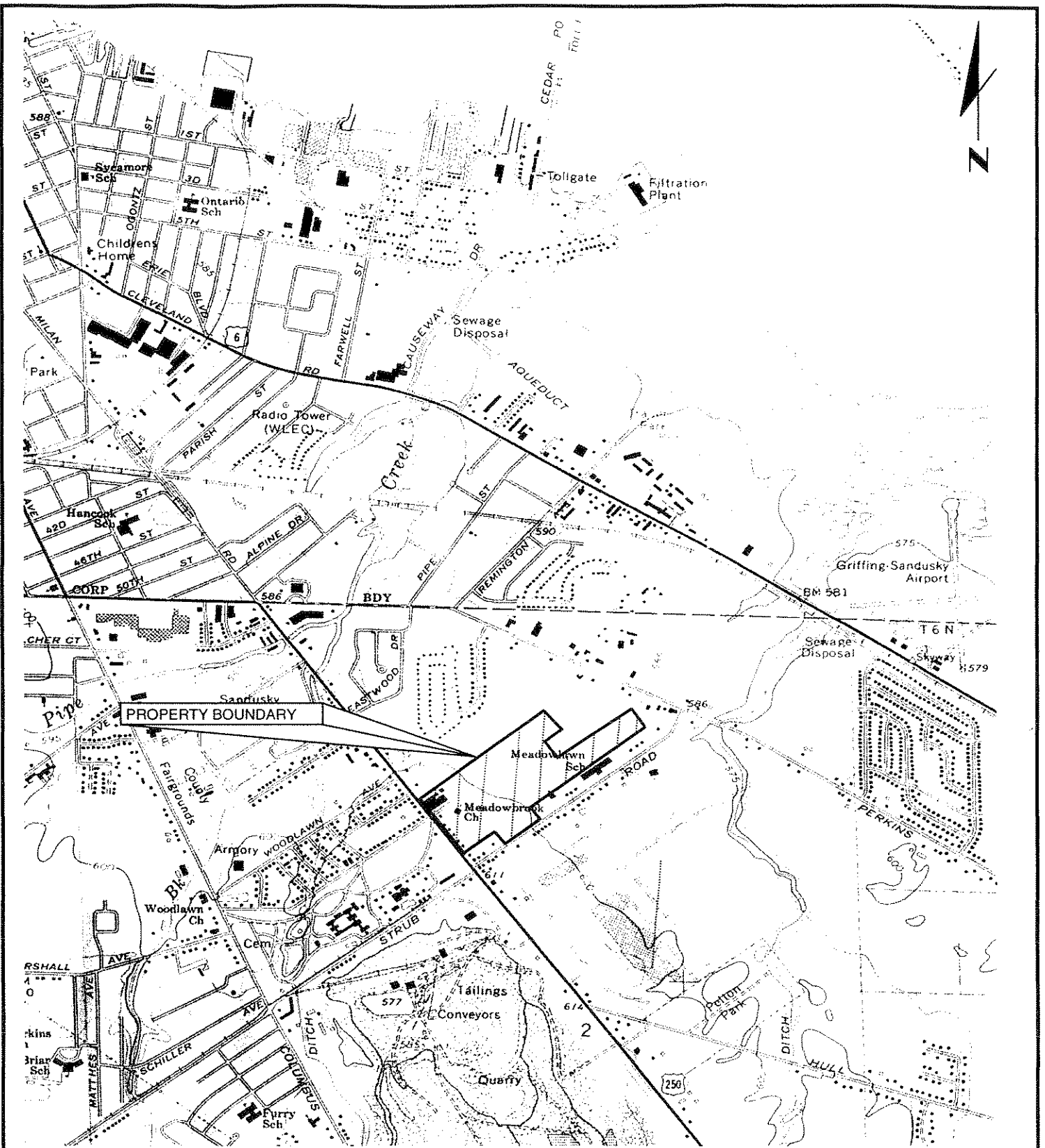
Copy To: _____ Sent By: Karyn Selle

_____ Sent For: _____

If you have difficulty receiving this facsimile, please call (440) 519-2555 as soon as possible.

CAUTION

The information contained in this facsimile message is confidential and is intended solely for the use of the recipient named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution, or unauthorized use of this message is strictly prohibited. If you have received this message in error, please notify the sender by telephone and return the original facsimile to the sender at the above address via the United States Postal Service.



PROPERTY BOUNDARY

SCALE 1" = 2000'

SOURCE: USGS 7.5 MIN QUADRANGLE

SANDUSKY, OH 1969
(PHOTOREVISED 1979)

FIGURE 1

HULL & ASSOCIATES, INC.
 SOLON, OHIO

VAP ENVIRONMENTAL PROPERTY ASSESSMENT

PROPERTY LOCATION MAP

U.S. ROUTE 250 AND STRUB ROAD
 SANDUSKY, OH

DATE: NOVEMBER 2002

HEM078

OHIO

QUADRANGLE LOCATION

HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
043	MEMORY TX		916142656767-582	02/02	OK

ERRORS

- 1) HANG UP OR LINE FAIL
- 2) BUSY
- 3) NO ANSWER
- 4) NO FACSIMILE CONNECTION



Ohio Department of Natural Resources

BOB TAFT, GOVERNOR

SAMUEL W. SPECK, DIRECTOR

James R. Morris • Chief

Division of Water

FAX TRANSMISSION

OHIO DEPARTMENT OF NATURAL RESOURCES
 DIVISION OF WATER
 1939 FOUNTAIN SQUARE, BLDG., E-1
 COLUMBUS, OH 43224
 (614) 265-6746
 FAX : (614) 265-6767

WELL LOG WEBSITE: <http://www.dnr.state.oh.us/water/maptechs/wellogs/app>E-MAIL: wrintern@dnr.state.oh.usTo: Karyn SelleDate: 11/15/02Fax #: 440-519-2560Pages: 6, including cover sheetFrom: Cory BonifasPhone: 440-519-2555Subject: Sandusky

COMMENTS:

Karyn. I'm not sure if you are doing an assessment
for a B.P. Gas station or not. I included 3
sealing reports for a B.P. station at 5606 Milan
Rd (215 250) incase you are doing an assessment
for a gas station



Ohio Department of Natural Resources

BOB TAFT, GOVERNOR

SAMUEL W. SPECK, DIRECTOR

James R. Morris • Chief

Division of Water

11/15/2002

Karyn Selle
Hull & Associates, Inc.
6161 Cochran Road, Suite A
Solon, Ohio 44139

Dear Karyn Selle,

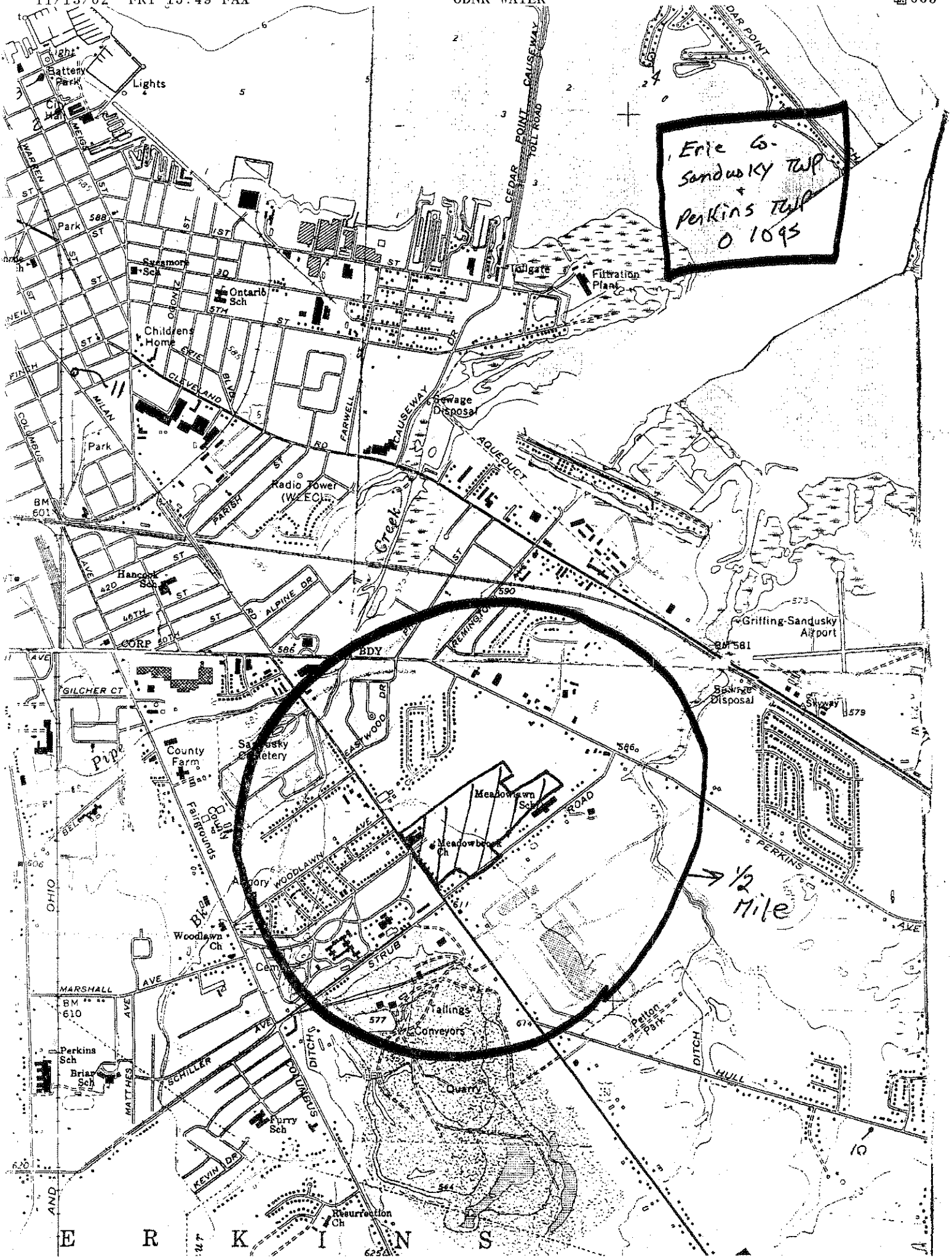
This letter is in response to your well log request on 11/13/02. We do not have located well logs within the 1/2-mile radius of the site you requested in the City of Sandusky, Erie County. However, I can perform a well log search for a specific address within our unlocated well log folders upon request. If you have any questions please contact me by phone at: (614) 265-6746, by fax at: (614) 265-6767, or by email at: wrintern@dnr.state.oh.us

*Also, please note that well log data (without location map) can be obtained on our web site at:
<http://www.dnr.state.oh.us/water/maptechs/wellogs/app/default.asp>

Sincerely,

A handwritten signature in cursive script that reads "Cory J. Bonifas".

Cory J. Bonifas
Ohio Department of Natural Resources
Division of Water
Water Resources Section



Erie 6
Sandusky Twp
Perkins Twp
0 1095

→ 1/2 mile

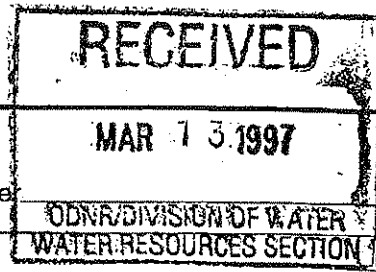
E R I E K I N S

DNR 7810.96

WATER WELL SEALING REPORT
OHIO DEPARTMENT OF NATURAL RESOURCES

0100795

Division of Water
1939 Fountain Square Drive
Columbus, Ohio 43224-9971
Voice: (614) 265-6739 Fax: (614) 447-9503



LOCATION

County Erie Township Pekins Section/Lot Number _____
Owner/Builder BP OIL
Address of Well Location 5606 Milan
City Sandusky Zip Code +4 _____
Property Location Description on the East side of Milan Road
1/2 miles North of RT 2 and 250
nearest intersection

Location of Well in State Plane coordinates, if available N S X _____ ft. or m Y _____ ft. or m

Elevation of Well _____ Datum Plain: NAD27 NAD83

Source of Coordinates: GPS Survey Other _____

ORIGINAL WELL ODNR Well Log Number _____ Copy attached? Yes or No (circle one)

MEASURED CONSTRUCTION DETAILS

Date of measurements 3-7-97

Depth of Well 13' Static Water Level _____
Size of Casing 4" Length of casing 13'
Well Condition good

SEALING PROCEDURE

Method of Placement Trim Pipe

Placement:	From	To	Sealing Material	Volume
	<u>13</u>	<u>1</u>	<u>Bentonite</u>	<u>70 gallons</u>
	<u>1</u>	<u>Surface</u>	<u>concrete</u>	<u>50LB.</u>

Was Casing Removed? Yes or No (circle one)

Condition of Casing good
Perforations: From 13 To 3

Date Sealing Performed 3/7/97
Reason(s) for Sealing _____

CONTRACTOR

Name North coast Drilling ODH Registration # _____
Address P.O. BOX 33207
City/State/Zip Cleveland, Ohio 44133-0207

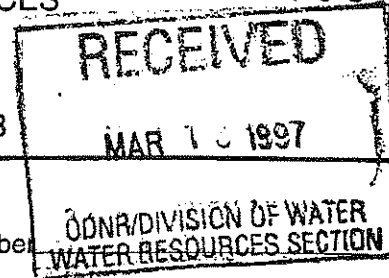
Signature [Signature]
I hereby certify the information given is accurate and correct to the best of my knowledge.

DNR 7810.96

WATER WELL SEALING REPORT
OHIO DEPARTMENT OF NATURAL RESOURCES

0100796

Division of Water
1939 Fountain Square Drive
Columbus, Ohio 43224-9971
Voice: (614) 265-6739 Fax: (614) 447-9503



LOCATION

County Erie Township Perkins Section/Lot Number _____
Circle One or Both
Owner/Builder B.P. Oil
Circle One or Both

Address of Well Location 56006 Milan
Number Street Name

City Sandusky Zip Code +4 _____
1/2 miles North of RT 2 and 250
n, e, s, w nearest intersection

Property Location Description on the East side of Milan Road
n, e, s, w road name

Location of Well in State Plane coordinates, if available N S X _____ ft. or m Y _____ ft. or m

Elevation of Well _____ ft. or m Datum Plain: NAD27 NAD83

Source of Coordinates: GPS Survey Other _____

ORIGINAL WELL ODNR Well Log Number _____ Copy attached? Yes or No (circle one)

MEASURED CONSTRUCTION DETAILS Date of measurements 3/7/97

Depth of Well 13' Static Water Level _____
Size of Casing 4" Length of casing 13'
Well Condition good

SEALING PROCEDURE

Method of Placement Trim pipe

Placement:	From	To	Sealing Material	Volume
	<u>13'</u>	<u>1'</u>	<u>Beatopite</u>	<u>70 gallons</u>
	<u>1'</u>	<u>Surface</u>	<u>Concrete</u>	<u>50 LB.</u>
	From	To		

Was Casing Removed? Yes or No (circle one)

Condition of Casing good
Perforations: From 13' To 3'
From _____ To _____

Date Sealing Performed 3/7/97
Reason(s) for Sealing _____

CONTRACTOR

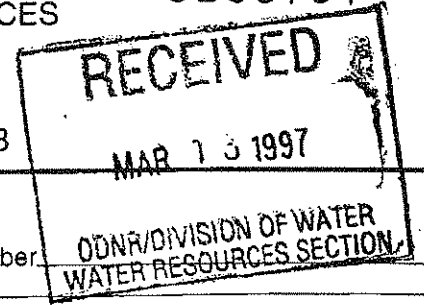
Name North coast Drilling ODH Registration # _____
Address P.O. Box 32207
City/State/Zip Cleveland, Ohio 44133-0207

Signature [Signature]
I hereby certify the information given is accurate and correct to the best of my knowledge.

DNR 7810.96

WATER WELL SEALING REPORT
OHIO DEPARTMENT OF NATURAL RESOURCES
 Division of Water
 1939 Fountain Square Drive
 Columbus, Ohio 43224-9971
 Voice: (614) 265-6739 Fax: (614) 447-9503

0100797



LOCATION

County Erie Township Perkins Section/Lot Number _____
 Owner/Builder B.P. O. I
 Circle One or Both

Address of Well Location 5606 Number Milan Street Name

City Sandusky Zip Code 44844
1/2 miles North of RT 2 and 250 nearest intersection
 n, e, s, w

Property Location Description on the East side of Milan Road road name
 n, e, s, w

Location of Well in State Plane coordinates, if available N S X _____ ft. or m Y _____ ft. or m

Elevation of Well _____ ft. or m Datum Plain: NAD27 NAD83

Source of Coordinates: GPS Survey Other _____

ORIGINAL WELL ODNR Well Log Number _____ Copy attached? Yes or No (circle one)

MEASURED CONSTRUCTION DETAILS Date of measurements 3-7-97

Depth of Well 13' Static Water Level _____
 Size of Casing 4" Length of casing 13'
 Well Condition good

SEALING PROCEDURE Method of Placement Trim pipe

Placement:	From	To	Sealing Material	Volume
	<u>13'</u>	<u>1'</u>	<u>Bentonite</u>	<u>70 gallons</u>
	<u>1'</u>	<u>Surface</u>	<u>concrete</u>	<u>SOLB</u>

Was Casing Removed? Yes or No (circle one)

Condition of Casing good
 Perforations: From 13' To 3'
 From _____ To _____

Date Sealing Performed 3/7/97
 Reason(s) for Sealing _____

CONTRACTOR
 Name North coast Drilling ODH Registration # _____
 Address P.O. Box 3320
 City/State/Zip Cleveland, Ohio 44133-0207

Signature [Signature]
 I hereby certify the information given is accurate and correct to the best of my knowledge.

Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Cindy Lewis FIRM: Ohio EPA DERR
FAX NO: 614-644-3250 HULL PROJECT CODE: HEM078
DATE 11/12/02 TIME: _____
RE: Information Request

Number of Pages (Including Cover Sheet)

THESE ARE TRANSMITTED:

- For Your Use As Requested For Approval
 For Review & Comment For Your Information

The original of this facsimile will will not be sent to the recipient.

Notes: _____

Copy To: _____ Sent By: Karyn Selle
_____ Sent For: _____

If you have difficulty receiving this facsimile, please call (440) 519-2555 as soon as possible.

CAUTION

The information contained in this facsimile message is confidential and is intended solely for the use of the recipient named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution, or unauthorized use of this message is strictly prohibited. If you have received this message in error, please notify the sender by telephone and return the original facsimile to the sender at the above address via the United States Postal Service.



November 12, 2002

VIA FACSIMILE: 614/644-3250

Ms. Cindy Lewis
Ohio EPA DERR
Lazarus Government Center
122 S. Front Street
P. O. Box 1049
Columbus, Ohio 43216-1049

Re: Request for Information Concerning Spills or Releases Involving Toxic or Hazardous Substances. HEM078.600.0004.

Dear Ms. Lewis:

Please send me the results of a file search containing any information regarding spills, unauthorized discharges, or other environmental problems involving toxic or hazardous substances at the following address:

U.S. Route 250 and Strub Road
Sandusky, Ohio

Please send us any other information you may have for the Property. I have enclosed a map with the location of the Property and surrounding streets. If you have any questions, please contact me at (440) 519-2555. Thank you in advance for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Karyn L. Selle".

Karyn L. Selle
Hydrogeologist I

ct: file

enclosure



HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
026	MEMORY TX		916146443250-582	03/03	OK

ERRORS

- 1) HANG UP OR LINE FAIL 2) BUSY 3) NO ANSWER 4) NO FACSIMILE CONNECTION

Ohio EPA
Division of Emergency and Remedial Response

MAILING ADDRESS
Ohio EPA, DERR
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

LOCATION ADDRESS
Ohio EPA, DERR
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43216-1049

FACSIMILE INFORMATION

ROUTE TO: Karvin Sella FAX: 440-519-2560

COMPANY NAME: Hull & Assoc. PHONE: _____

REGARDS TO REQUEST: US Route 250 + Strub Rd.
Sandusky

FROM: Cindy Lewis ER Data Systems Coordinator (cindy.lewis@epa.state.oh.us)

NUMBER OF PAGES (including this page): 2 DATE: 11/15

Emergency Response Facsimile (614) 644-3250
Cindy Lewis, DSC Coordinator (614) 644-2084

NOTE TO RECEIVER _____

Here is the information you requested.

Nothing was found for your request on: _____

Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Cindy Lewis FIRM: Ohio EPA DERR
FAX NO: 614-644-3250 HULL PROJECT CODE: HEM078
DATE 11/13/02 TIME: _____
RE: Information Request

Number of Pages (Including Cover Sheet)

THESE ARE TRANSMITTED:

- For Your Use As Requested For Approval
 For Review & Comment For Your Information

The original of this facsimile will will not be sent to the recipient.

Notes: _____

Please disregard the fax received late yesterday. We have this exact address now rather than the intersection only. Thank you.

Copy To: _____ Sent By: Karyn Selle
Sent For: _____

If you have difficulty receiving this facsimile, please call (440) 519-2555 as soon as possible.

CAUTION

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NOV 12 '02 05:55PM HULL & ASSOCIATES

Hull

& associates, inc.

2268

VIA FACSIMILE: 614/644-3250

November 12, 2002

Ms. Cindy Lewis
Ohio EPA DERR
Lazarus Government Center
122 S. Front Street
P. O. Box 1049
Columbus, Ohio 43216-1049

Re: Request for Information Concerning Spills or Releases Involving Toxic or Hazardous Substances. HEM078.600.0004.

Dear Ms. Lewis:

Please send me the results of a file search containing any information regarding spills, unauthorized discharges, or other environmental problems involving toxic or hazardous substances at the following address:

U.S. Route 250 and Strub Road
Sandusky, Ohio

Please send us any other information you may have for the Property. I have enclosed a map with the location of the Property and surrounding streets. If you have any questions, please contact me at (440) 519-2555. Thank you in advance for your assistance.

Sincerely,



Karyn L. Selle
Hydrogeologist I

cc: file

enclosure

6161 Cochran Road, Suite A • Solon, Ohio 44139

440.519.2555 fax 440.519.2560 www.hullinc.com



November 13, 2002

VIA FACSIMILE: 614/644-3250

Ms. Cindy Lewis
Ohio EPA DERR
Lazarus Government Center
122 S. Front Street
P. O. Box 1049
Columbus, Ohio 43216-1049

Re: Request for Information Concerning Spills or Releases Involving Toxic or Hazardous Substances. HEM078.600.0004.


Dear Ms. Lewis:

Please send me the results of a file search containing any information regarding spills, unauthorized discharges, or other environmental problems involving toxic or hazardous substances at the following address:

3612 Miland Road
Sandusky, Ohio

Please send us any other information you may have for the Property. I have enclosed a map with the location of the Property and surrounding streets. If you have any questions, please contact me at (440) 519-2555. Thank you in advance for your assistance.

Sincerely,



Karyn L. Selle
Hydrogeologist I

ct: file

enclosure



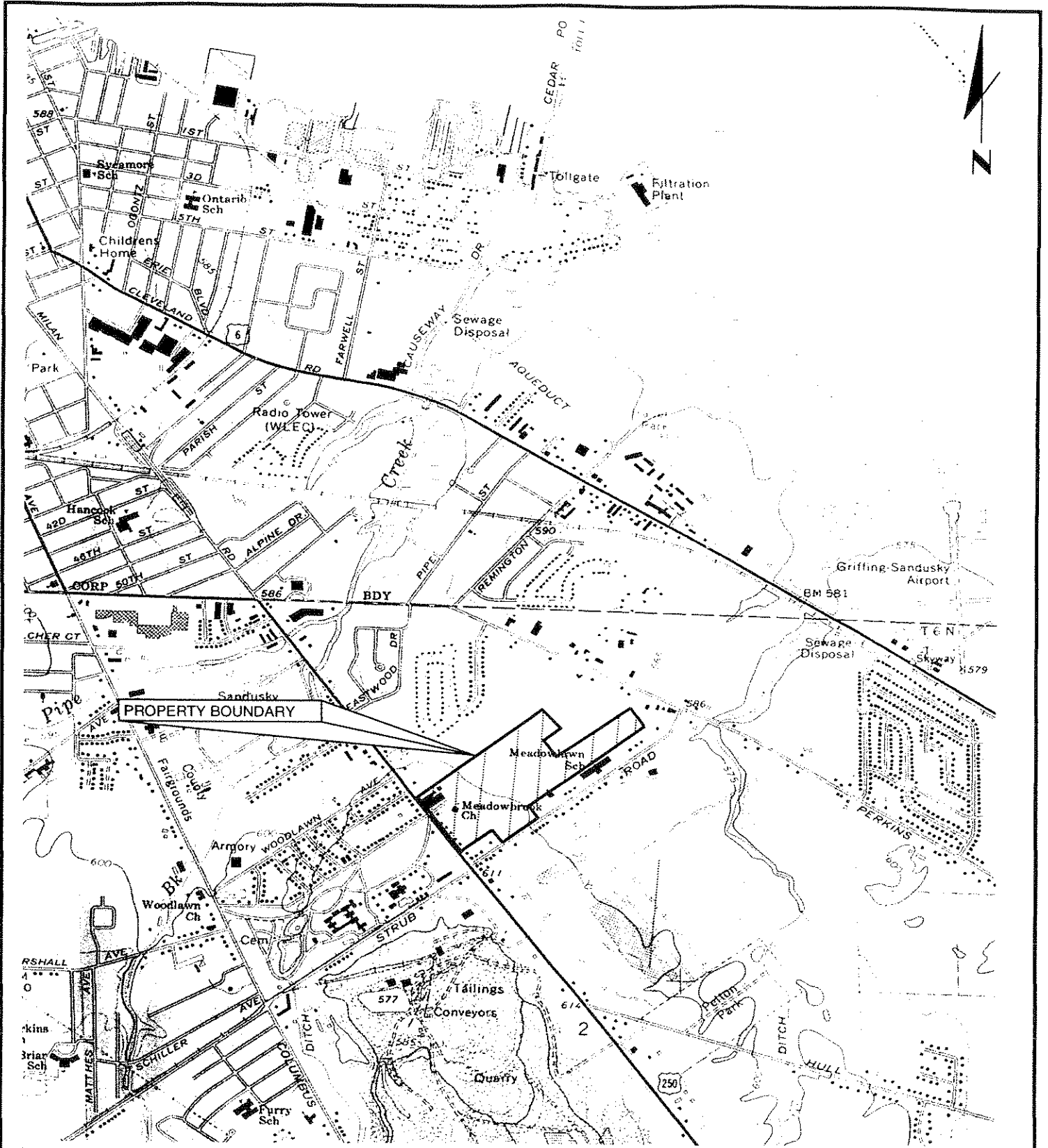


FIGURE 1

HULL & ASSOCIATES, INC.
 SOLON, OHIO

VAP ENVIRONMENTAL PROPERTY ASSESSMENT

PROPERTY LOCATION MAP

U.S. ROUTE 250 AND STRUB ROAD
 SANDUSKY, OH

DATE: NOVEMBER 2002

HEM078

SCALE 1" = 2000'

SOURCE: USGS 7.5 MIN QUADRANGLE

SANDUSKY, OH 1969
 (PHOTOREVISED 1979)

OHIO

QUADRANGLE LOCATION

HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
038	MEMORY TX		916146443250-582	03/03	OK

ERRORS

1) HANG UP OR LINE FAIL 2) BUSY 3) NO ANSWER 4) NO FACSIMILE CONNECTION

Ohio EPA
Division of Emergency and Remedial Response

MAILING ADDRESS
Ohio EPA, DERR
Lazarus Government Center
P.O. Box 1049
Columbus, Ohio 43216-1049

LOCATION ADDRESS
Ohio EPA, DERR
Lazarus Government Center
122 South Front Street
Columbus, Ohio 43216-1049

FACSIMILE INFORMATION

ROUTE TO: Karyn Selle FAX: 440-519-2560
COMPANY NAME: Hull + Assoc. PHONE: _____
REGARDS TO REQUEST: 3612 Milano Rd, Sandusky

FROM: Cindy Lewis ER Data Systems Coordinator (cindy.lewis@epa.state.oh.us)

NUMBER OF PAGES (including this page): 2 DATE: 11/15

Emergency Response Facsimile (614) 644-3250
Cindy Lewis, DSC Coordinator (614) 644-2084

NOTE TO RECEIVER _____

Here is the information you requested.

Nothing was found for your request on: _____

NOV 13 '02 02:44PM HULL & ASSOCIATES

P. 2/5

Hull

& associates, inc.

2267

November 13, 2002

VIA FACSIMILE: 614/644-3250

Ms. Cindy Lewis
Ohio EPA DERR
Lazarus Government Center
122 S. Front Street
P. O. Box 1049
Columbus, Ohio 43216-1049

Re: Request for Information Concerning Spills or Releases Involving Toxic or Hazardous Substances. HEM078.600.0004.


Dear Ms. Lewis:

Please send me the results of a file search containing any information regarding spills, unauthorized discharges, or other environmental problems involving toxic or hazardous substances at the following address:

3612 Miland Road
Sandusky, Ohio

Please send us any other information you may have for the Property. I have enclosed a map with the location of the Property and surrounding streets. If you have any questions, please contact me at (440) 519-2555. Thank you in advance for your assistance.

Sincerely,



Karyn L. Selle
Hydrogeologist I

ct: file

enclosure

Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Nancy Caldwell FIRM: Dept. of Industrial Compliance
FAX NO: 614-752-7942 HULL PROJECT CODE: HEM078
DATE 11/13/02 TIME: _____
RE: Information Request

Number of Pages (Including Cover Sheet)

THESE ARE TRANSMITTED:

For Your Use As Requested For Approval
 For Review & Comment For Your Information

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Notes: _____

Please disregard the fax received late yesterday. We have this exact address now rather than the intersection
only . Thank you.

Copy To: _____ Sent By: Karyn Selle
_____ Sent For: _____

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Hull

& associates, inc.

November 13, 2002

VIA FACSIMILE: 614/752-7942

Ms. Nancy Caldwell
Department of Industrial Compliance
BUSTR
8895 East Main Street
Reynoldsburg, OH 43068

Re: Request for Copies of BUSTR Files for Property in Sandusky, Ohio.
HEM078.600.0004.

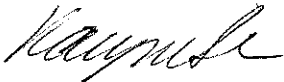
Dear Ms. Caldwell:

Please check for BUSTR files on file for the following address:

3612 Milan Road
Sandusky, Ohio

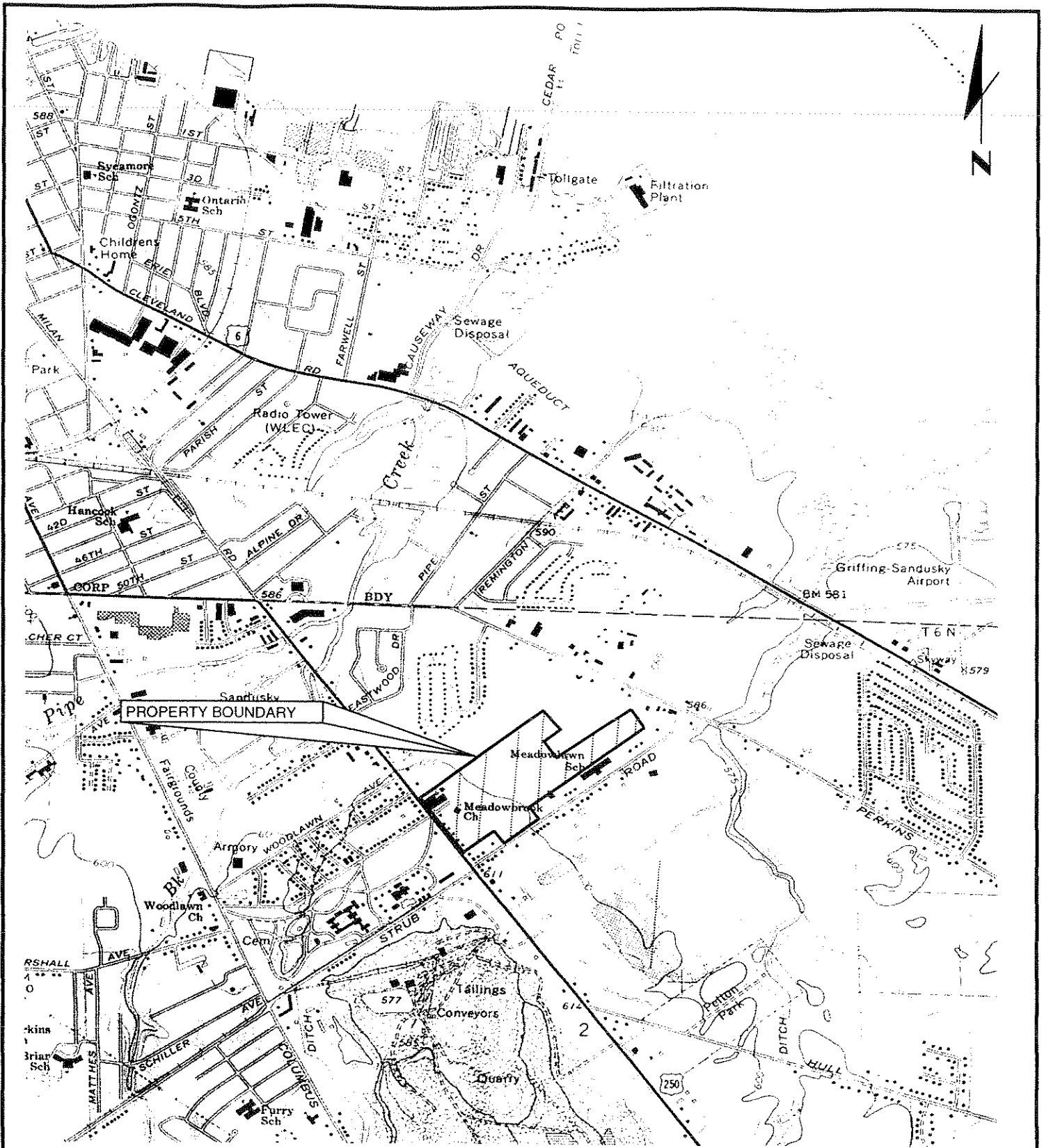
Once you have checked your files please contact me so that we can decide whether it would be best to send a Hull representative from our office or to have you make the copies and send them directly here. If you have any questions, please contact me at (440) 519-2555. Thank you for your assistance.

Sincerely,



Karyn L. Selle
Hydrogeologist I
ct: file





PROPERTY BOUNDARY

FIGURE 1

HULL & ASSOCIATES, INC.
 SOLOON, OHIO

VAP ENVIRONMENTAL PROPERTY ASSESSMENT

PROPERTY LOCATION MAP

U.S. ROUTE 250 AND STRUB ROAD
 SANDUSKY, OH

DATE: NOVEMBER 2002

HEM078

SCALE 1" = 2000'

SOURCE: USGS 7.5 MIN QUADRANGLE

SANDUSKY, OH 1969
 (PHOTOREVISED 1979)

OHIO

QUADRANGLE LOCATION

HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
039	MEMORY TX		916147527942-582	03/03	OK

ERRORS

1) HANG UP OR LINE FAIL 2) BUSY 3) NO ANSWER 4) NO FACSIMILE CONNECTION

Ohio Department of Commerce
Division of State Fire Marshal /Bustr
8895 E. Main Street
Reynoldsburg Ohio 43068



Fax

To: Karyn Selle From: NANCY CALDWELL

Fax: _____ Pages: _____

Phone: _____ Date: 11-14-02

Re: _____ Phone: 614-387-7412

- Urgent For Review Please Comment Please Reply Please Recycle

•
 REFERENCE NO. / ADDRESS : 3612 Milan Road
Sandusky Ohio

The Bureau of Underground Storage Tanks has received your Freedom of Information Act request and provides the following response:

X We have searched our database and found no records for the address(es) that you have requested.

Nancy Caldwell 11-14-02

Ohio Department of Commerce
Division of State Fire Marshal /Bustr
8895 E. Main Street
Reynoldsburg Ohio 43068



Fax

To: Karlyn Selle From: NANCY CALDWELL

Fax: _____ Pages: _____

Phone: _____ Date: 11-19-02

Re: _____ Phone: 614-387-7412

- Urgent For Review Please Comment Please Reply Please Recycle

REFERENCE NO. / ADDRESS : U.S. Rt. 250 & Strub Rd.
Sandusky Ohio
4605 E. 355th St.
Willoughby Ohio

The Bureau of Underground Storage Tanks has received your Freedom of Information Act request and provides the following response:

X We have searched our database and found no records for the address(es) that you have requested.

Nancy Caldwell 11-19-02

Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Sue Kist FIRM: Dept. of Industrial Compliance
FAX NO: 614-752-7942 HULL PROJECT CODE: HEM078
DATE 11/12/02 TIME: _____
RE: Information Request

Number of Pages (Including Cover Sheet)

THESE ARE TRANSMITTED:

For Your Use As Requested For Approval
 For Review & Comment For Your Information

The original of this facsimile will will not be sent to the recipient.

Notes: _____

Copy To: _____ Sent By: Karyn Selle
_____ Sent For: _____

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November 12, 2002

VIA FACSIMILE: 614/752-7942

Ms. Sue Kist
Department of Industrial Compliance
BUSTR
6606 Tussing Road
Reynoldsburg, OH 43068

Re: Request for Copies of BUSTR Files for Property in Sandusky, Ohio.
HEM078.600.0004.

Dear Ms. Kist:

Please check for BUSTR files on file for the following address:

U.S. Route 250 and Strub Road
Sandusky, Ohio

Once you have checked your files please contact me so that we can decide whether it would be best to send a Hull representative from our office or to have you make the copies and send them directly here. If you have any questions, please contact me at (440) 519-2555. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karyn L. Selle".

Karyn L. Selle
Hydrogeologist I
ct: file



HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
027	MEMORY TX		916147527942-582	03/03	OK

ERRORS

1) HANG UP OR LINE FAIL 2) BUSY 3) NO ANSWER 4) NO FACSIMILE CONNECTION

**Please advise all employees that BUSTR has
moved to a new location**

**8895 East Main Street Reynoldsburg Ohio
43068**

**ALL FOIA REQUEST CAN BE
DIRECTED TO**

**Nancy Caldwell @ 614-387-7412
Fax # 614-752-7942**

e-mail address

nccaldwe@com.state.oh.us

Hull

& associates, inc.

November 12, 2002

VIA FACSIMILE: 614/752-7942

Ms. Sue Kist
Department of Industrial Compliance
BUSTR
6606 Tussing Road
Reynoldsburg, OH 43068

Re: Request for Copies of BUSTR Files for Property in Sandusky, Ohio.
HEM078.600.0004.

Dear Ms. Kist:

Please check for BUSTR files on file for the following address:

U.S. Route 250 and Strub Road
Sandusky, Ohio

No Files

Once you have checked your files please contact me so that we can decide whether it would be best to send a Hull representative from our office or to have you make the copies and send them directly here. If you have any questions, please contact me at (440) 519-2555. Thank you for your assistance.

Sincerely,



Karyn L. Selle
Hydrogeologist I
ct: file

STATE FIRE MARSHAL /BUSTR
8895 EAST MAIN STREET
REYNOLDSBURG, OH 43068

F A X COVER SHEET

TO:

Karyn Selle

FROM:

Nancy Caldwell

DATE:

FAX #:

CONTACT #:

PAGES:

~~5~~ 3

RE:

MESSAGE:



November 13, 2002

Ms. Marianne Cheetham
Erie County Information Coordinator
Erie County LEPC
2900 Columbus Ave.
Sandusky, OH 44870

Re: Request for File Search: HEM078.600.0004.

Dear Ms. Cheetham:

Please send me the results of a file search containing any information at the following address:

3612 Milan Road
Sandusky, Ohio

I have enclosed a map showing the location of the Property and surrounding streets.

If you have any questions, please contact me at (440) 519-2555. Thank you for your assistance.

Sincerely,



Karyn L. Selle
Hydrogeologist I

ct: file

enclosure

see attached

NOV 20 REC'D





Ohio State Emergency Response Commission
 c/o Ohio EPA, Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

Please check, as applicable

EHS Reported

HC Reported

No change (from last year's)

Exempt

Negative

Ownership change

First time filer

Facility Identification Form

(Important: Type or print: Read Instructions before completing form.)

For filing Date: 03/01/02

County: Erie Check if form is identical to form submitted last year

Where to send completed forms:

SERC
 c/o Ohio EPA
 Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

County Local Emergency Planning Committee Information Coordinators

Local Fire Department within the jurisdiction of the facility

1. Parent Company or Public Entity Identification

1.1 Name of Parent Company (30 char max)
Same 11

1.2 Address (30 char max)
 Address (30 char max)
 City (25 char max) _____ State _____
 Zip Code _____ 1.3-Parent Company: Dun & Bradstreet # _____ 13

NOTE: If marked "ownership change" in box located in upper right-hand corner, please provide

2. Facility Identification

Operating Division Name (30 char max)
N/A 14

Facility Name (30 char max)
Bechtel-McLaughlin, Inc. 15

Street Location (30 char max)
3612 Milan Rd. 16

Mailing Address (if different from Street Location) (30 char max)
 _____ 17

City (25 char max) _____ State _____
Sandusky OH

Zip Code _____ 2.3-Facility: Dun & Bradstreet # _____ a. SIC Code _____
41487101516118010141181216114314711

Emergency Contact (30 char max)
Charles E. Ohlemacher 18

Alternate Contact (30 char max)
Charles Lazzara 19

Fire Department Name (25 char max)
Perkins Twp. Fire Department 20

Fire Department Telephone Number
(419) 626-1242 21

A) Name of previous parent company/owner (if known)

B) Name of previous facility name (if known)

Name _____

2.7 Latitude _____ Longitude _____ a. # of Employees _____
041125470804053

2.8 RCRA Identification # _____ a. NPDES Permit # _____
OH D 004182614 OH R 00000003

2.9 State Wastewater Facility # _____ a. Pretreatment # _____ 22
N/A

2.10 Air Permit Facility # _____ a. Check if list of Facility Permit numbers is attached.
0322021007

b. 24 Hr. Telephone Number (include area code)
(419) 359-1311 18

Telephone Number (include area code)
(419) 625-3873 19

Telephone Number (include area code)
(419) 625-3873 20

Fire Department Telephone Number
(419) 626-1242 21

(This Space for EPA use only)

RECEIVED
 2-27-02

3. Certification (Read and sign after completing all sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on data available to the owners/operator of this facility.

3.1 Name and official title of owner/operator or senior management official at facility
Charles E. Ohlemacher - CEO Office Telephone Number
(419) 625-3873 23

3.2 Signature Charles E. Ohlemacher Date Signed
02/12/02



Ohio State Emergency Response Commission
 c/o Ohio EPA, Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

Please check, as applicable

- EHS Reported
- HC Reported
- No change (from last year's)
- Exempt
- Negative
- Ownership change
- First time filer

Facility Identification Form

(Important: Type or print: Read Instructions before completing form.)

For filing Date: 03 / 01 / 01 /

Check if form is identical to form submitted last year

County: Erie

Where to send completed forms:

SERC
 c/o Ohio EPA
 Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

County Local Emergency Planning Committee Information Coordinators

Local Fire Department within the jurisdiction of the facility

NOTE: If marked "ownership change" in box located in upper right-hand corner, please provide:

a) Name of previous parent company/owner (if known)

Name _____

Address _____

City, State, Zip _____

b) Name of previous facility name (if known)

Name _____

b. 24 Hr. Telephone Number (Include area code)
 (4 | 1 | 9) | 3 | 5 | 9 | 1 | 3 | 1 | 1 18

Telephone Number (Include area code)
 (4 | 1 | 9) | 6 | 2 | 5 | 3 | 8 | 7 | 3 19

Telephone Number (Include area code)
 (4 | 1 | 9) | 6 | 2 | 5 | 3 | 8 | 7 | 3 20

Fire Department Telephone Number
 (4 | 1 | 9) | 6 | 2 | 6 | 1 | 2 | 4 | 2 21

1. Parent Company or Public Entity Identification			
1.1	Name of Parent Company (30 char max)	11	
	Same		
1.2	Address (30 char max)	12	
	Address (30 char max)		
	City (25 char max)	State	
	Zip Code	1.3-Parent Company: Dun & Bradstreet #	13

2. Facility Identification			
2.1	Operating Division Name (30 char max)	14	
	N/A		
2.2	Facility Name (30 char max)	15	
	Bechtel-McLaughlin, Inc.		
	Street Location (30 char max)	16	
	3612 Milan Rd.		
	Mailing Address (if different from Street Location) (30 char max)	17	
	City (25 char max)	State	
	Sandusky	O H	
	Zip Code	2.3-Facility: Dun & Bradstreet #	a. SIC Code
	4 1 8 1 7 0 5 6 1 8	0 0 4 1 8 2 6 1 4	3 4 7 1

2.4	Emergency Contact (30 char max)	19	
	Charles E. Ohlemacher		
2.5	Alternate Contact (30 char max)	20	
	Charles Lazzara		
2.6	Fire Department Name (25 char max)	21	
	Perkins Twp. Fire Department		

2.7	Latitude	Longitude	a. # of Employees
	Deg. Min. Sec.	Deg. Min. Sec.	
	0 4 1 25 4 7 0	8 0 4 0 5 3	
2.8	RCRA Identification #	a. NPDES Permit #	
	0 H D 0 0 4 1 8 2 6 1 4	0 H R 0 0 0 0 0 0 3	
2.9	State Wastewater Facility #	a. Pretreatment #	22
	N/A	N/A	
2.10	Air Permit Facility #	a. Check if list of Facility Permit numbers is attached.	
	0 3 22 0 2 0 0 0 7		

(This Space for EPA use only)

RECEIVED
 2-23-01

3. Certification (Read and sign after completing all sections.)

I hereby certify that I have reviewed the attached documents and that, to the best of my knowledge and belief, the submitted information is true and complete and that the amounts and values in this report are accurate based on data available to the owners/operator of this facility.

3.1 -Name and official title of owner/operator or senior management official at facility	Office Telephone Number
Charles Ohlemacher - CEO	(4 1 9) 6 2 5 3 8 7 3 23
3.2 -Signature	Date Signed



Ohio State Emergency Response Commission
 c/o Ohio EPA, Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

STAPLE

Emergency and Hazardous Chemical Inventory Form

Page 2 of 9 Pages

4.1 Facility Name: Bechtel-McLaughlin City: Sandusky County: Erie
 Exact Street Location (no box #s): 3612 Milan Rd Zip Code: 448705618

4.2 For Filing Date: 03/01/01 Check here if form and FACILITY MAP are Confidential and print "CONFIDENTIAL FORM" here:
 4.3 Check here if form and FACILITY MAP are Confidential and print "CONFIDENTIAL FORM" here:
 4.4 Check if Revision
 4.5 Have Attached a Facility Map

5.0	Chemical Description										Hazard Class			Location of Chemicals						Amount					
	CAS REGISTRY NO.	SPECIFIC CHEMICAL NAME	PURE	MIXTURE	COMPONENTS	EHS CHEMICAL	SOLID	LIQUID	GAS	TRADE SECRET	ACUTE	CHRONIC	FIRE	REACTIVE	RELEASE OF PRESSURE	B.T. OR A. BUILDING, TANK OR AREA NO.	DIVISION OR ROOM LETTER	FLOOR	STORAGE TYPE CODE	PRESSURE & TEMPERATURE CONDITIONS	LOCATION - CONFIDENTIAL	MAXIMUM	AVERAGE	UNITS	NO. OF DAYS ON SITE
1	1310-73-2	Sodium Hydroxide		X			X			X			X			B01		1	V39	1,5		02	02	P	365
2	1310-73-2	Sodium Hydroxide		X			X			X		X				B01		1	V40	1,5		02	02	P	365
3	1310-73-2	Sodium Hydroxide		X			X			X		X				B01		1	V61	1,5		03	01	P	180
4	1310-73-2	Sodium Hydroxide		X			X			X		X				B01		1	V62	1,5		03	01	P	180
5	1310-73-2	Sodium Hydroxide		X			X			X		X				B01		1	V69	1,4		03	03	P	180

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 _____, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

Charles Ohlenbacher-CEO

NAME AND OFFICIAL TITLE OF OWNER OR OWNERS AUTHORIZED REPRESENTATIVE: _____ SIGNATURE: _____ DATE SIGNED: _____



Ohio Emergency Response Unit
 c/o Ohio EPA, Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

Emergency and Hazardous Chemical Inventory Form

4.1 Facility Name: Rechtel-McLaughlin City: Sandusky County: Erie

Exact Street Location (no box #s): 3612 Milan Rd. Zip Code: 4487018

4.2 For Filing Date: 03/01/01
 4.3 Check here if form and FACILITY MAP are Confidential and print "CONFIDENTIAL FORM" here:
 4.4 Check if Revision
 4.5 I Have Attached a Facility Map

5.0	Chemical Description				Hazard Class				Location of Chemicals						Amount										
	CAS REGISTRY NO.	SPECIFIC CHEMICAL NAME	PURE	MIXTURE	COMPONENTS	EHS CHEMICAL	SOLID	LIQUID	GAS	TRADE SECRET	ACUTE	CHRONIC	FIRE	REACTIVE	RELEASE OF PRESSURE	B. T. OR A. BUILDING, TANK OR AREA NO.	DIVISION OR ROOM LETTER	FLOOR	STORAGE TYPE CODE	PRESSURE & TEMPERATURE CONDITIONS	LOCATION - CONFIDENTIAL	MAXIMUM	AVERAGE	UNITS	NO. OF DAYS ON SITE
1	1310-73-2	Sodium Hydroxide		X			X				X			X		B01		1	V70	1,4		03	03	P	180
2	1310-73-2	Sodium Hydroxide		X			X				X			X		B02		1	V71	1,4		02	02	P	365
3	1310-73-2	Sodium Hydroxide		X			X				X			X		B02		1	C101	1,4		04	03	P	365
4	1310-73-2	Sodium Hydroxide		X			X				X			X		B01		1	J01	1,4		03	02	P	365
5	7647-01-0	Hydrochloric Acid (39% Hydrogen Chloride)		X			X				X					B01		1	V09	1,4		03	03	P	365

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 _____, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

Charles Ohlemacher-CEO

NAME AND OFFICIAL TITLE OF OWNER OR OWNERS AUTHORIZED REPRESENTATIVE _____ SIGNATURE _____ DATE SIGNED _____



Ohio State Emergency Response Commission
 c/o Ohio EPA, Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

STAFF

Emergency and Hazardous Chemical Inventory Form

4.1 Facility Name: Bechtel-McLaughlin City: Sandusky County: Erie
 Exact Street Location (no box #): 3612 Milan Rd. Zip Code: 44870518

4.2 For Filing Date: 03/01/01
 4.3 Check here if form and FACILITY MAP are Confidential and print "CONFIDENTIAL FORM" here:
 4.4 Check if Revision
 4.5 I Have Attached a Facility Map

CAS REGISTRY NO.	CHEMICAL DESCRIPTION	HAZARD CLASS						LOCATION OF CHEMICALS						AMOUNT										
		ACUTE	CHRONIC	FIRE	REACTIVE	RELEASE OF PRESSURE	TRADE SECRET	PURE	MIXTURE	COMPONENTS	EPS CHEMICAL	SOLID	LIQUID	GAS	BUILDING, TANK OR AREA NO.	DIVISION OR ROOM LETTER	FLOOR	STORAGE TYPE CODE	PRESSURE & TEMPERATURE CONDITIONS	LOCATION - CONFIDENTIAL	MAXIMUM	AVERAGE	UNITS	NO. OF DAYS ON SITE
7647-01-0	Hydrochloric Acid (39% Hydrogen Chloride)	X										X						V11	1,4		03	03	P	365
7647-01-0	Hydrochloric Acid (39% Hydrogen Chloride)	X										X						V21	1,4		03	03	P	365
7647-01-0	Hydrochloric Acid (39% Hydrogen Chloride)	X										X						V42	1,4		03	03	P	365
7647-01-0	Hydrochloric Acid (39% Hydrogen Chloride)	X										X						V43	1,4		03	03	P	365
7647-01-0	Hydrochloric Acid (39% Hydrogen Chloride)	X										X						V64	1,4		03	03	P	180

CERTIFICATION (READ AND SIGN AFTER COMPLETING ALL SECTIONS)
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Charles Ohlemacher-CEO
 NAME AND OFFICIAL TITLE OF OWNER OR OWNERS AUTHORIZED REPRESENTATIVE
 SIGNATURE
 DATE SIGNED



Ohio State Emergency Response Commission
 c/o Ohio EPA, Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

STAPLE

Emergency and Hazardous Chemical Inventory Form

4.1 Facility Name: Bechtel-McLaughlin City: Sandusky County: Erie
 Exact Street Location (no box #s): 3612 Milan Rd. Zip Code: 4487018

4.2 For Filing Date: 03/01/01 Check here if form and FACILITY MAP are Confidential and print "CONFIDENTIAL FORM" here:
 4.4 Check if Revision
 4.5 I Have Attached a Facility Map

5.0	Chemical Description				Hazard Class				Location of Chemicals						Amount										
	CAS REGISTRY NO.	SPECIFIC CHEMICAL NAME	PURE	MIXTURE	COMPONENTS	EHS CHEMICAL	SOLID	LIQUID	GAS	TRADE SECRET	ACUTE	CHRONIC	FIRE	REACTIVE	RELEASE OF PRESSURE	B.T. OR A. BLDG. TANK OR AREA NO.	DIVISION OR ROOM LETTER	FLOOR	STORAGE TYPE CODE	PRESSURE & TEMPERATURE CONDITIONS	LOCATION-CONFIDENTIAL	MAXIMUM	AVERAGE	UNITS	NO. OF DAYS ON SITE
1	7647-01-0	Hydrochloric Acid (39% Hydrogen Chloride)		X			X				X					B01	1	1	V66	1,4		03	03	P	180
2	7647-01-0	Hydrochloric Acid (39% Hydrogen Chloride)		X			X				X					B02	1	1	V80	1,4		02	02	P	365
3	7647-01-0	Hydrochloric Acid (39% Hydrogen Chloride)	X								X					T100	1	1	A	1,4		04	03	P	365
4	7647-01-0	Hydrochloric Acid (39% Hydrogen Chloride)	X				X				X					B01	1	1	001	1,4		02	02	P	365
5	7647-01-0	Hydrochloric Acid (39% Hydrogen Chloride)		X			X				X					B01	1	1	E01	1,4		01	01	P	365

CERTIFICATION (READ AND SIGN AFTER COMPLETING ALL SECTIONS)
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NAME AND OFFICIAL TITLE OF OWNER OR OWNERS AUTHORIZED REPRESENTATIVE: Charles Ohlemacher-CEO SIGNATURE: _____ DATE SIGNED: _____



Ohio State Emergency Response Commission
 c/o Ohio EPA, Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

Emergency and Hazardous Chemical Inventory Form

4.1 Facility Name: Bechtel-McLaughlin City: Sandusky County: Erie
 Exact Street Location (no box #): 3612 Milan Rd. Zip Code: 448705618

4.2 For Filing Date: 03/01/01 Check here if form and FACILITY MAP

4.4 Check if Revision

4.5 Have Attached a Facility Map

4.3 Check here if form and FACILITY MAP are Confidential and print "CONFIDENTIAL FORM" here:

5.0 CAS REGISTRY NO.	CHEMICAL DESCRIPTION	HAZARD CLASS							LOCATION OF CHEMICALS							AMOUNT				
		ACUTE	CHRONIC	FIRE	REACTIVE	RELEASE OR PRESSURE	BUILDING, TANK OR AREA NO.	DIVISION OR ROOM LETTER	FLOOR	STORAGE TYPE CODE	PRESSURE & TEMPERATURE CONDITIONS	LOCATION-CONFIDENTIAL	MAXIMUM	AVERAGE	UNITS	NO. OF DAYS ON SITE				
1	Potassium Chloride	X									B01		1	I	1,4		04	03	P	365
2	Potassium Chloride	X									B01		1	V51	1,4		03	03	P	365
3	Potassium Chloride	X									B01		1	V52	1,4		03	03	P	365
4	Nitric Acid	X						X			B01		1	V24	1,4		02	02	P	365
5	Nitric Acid	X						X			B01		1	V25	1,4		01	01	P	365

CERTIFICATION (READ AND SIGN AFTER COMPLETING ALL SECTIONS)

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Charles Chlemacher-CEO

NAME AND OFFICIAL TITLE OF OWNER OR OWNERS AUTHORIZED REPRESENTATIVE

SIGNATURE

DATE SIGNED



Ohio State Emergency Response Commission
 c/o Ohio EPA, Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

Emergency and Hazardous Chemical Inventory Form

4.1 Facility Name Bechtel-McLaughlin City Sandusky County ERIE
 Exact Street Location (no box #'s) 3622 Milan Rd. Zip Code 448705618

4.2 For Filing Date: 03/01/01 Check here if form and FACILITY MAP are Confidential and print "CONFIDENTIAL FORM" here:
 4.4 Check if Revision
 4.5 I Have Attached a Facility Map

CAS REGISTRY NO.	CHEMICAL DESCRIPTION	HAZARD CLASS										LOCATION OF CHEMICALS						AMOUNT						
		PURE	MIXTURE	COMPONENTS	EHS CHEMICAL	SOLID	LIQUID	GAS	TRADE SECRET	ACUTE	CHRONIC	FIRE	REACTIVE	RELEASE OF PRESSURE	B, T, OR A BUILDING OR AREA NO.	DIVISION OR ROOM LETTER	FLOOR	STORAGE TYPE CODE	PRESSURE & TEMPERATURE CONDITIONS	LOCATION - CONFIDENTIAL	MAXIMUM	AVERAGE	UNITS	NO. OF DAYS ON SITE
1	7697-32-2 Nitric Acid			X	X				X		X				B01		1	V35	1,4		02	02	P	365
2	7697-32-2 Nitric Acid			X	X				X		X				B01		1	V57	1,4		02	02	P	180
3	7697-32-2 Nitric Acid			X	X				X		X				B01		1	V58	1,4		02	02	P	180
4	7697-32-2 Nitric Acid			X	X				X		X				B01		1	E02	1,4		02	02	P	365
5	7664-93-9 Sulfuric Acid			X	X				X		X				B01		1	V33	1,4		02	02	P	365

CERTIFICATION (READ AND SIGN AFTER COMPLETING ALL SECTIONS)
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Charles Ohlemacher-CEO
 NAME AND OFFICIAL TITLE OF OWNER OR OWNERS AUTHORIZED REPRESENTATIVE
 SIGNATURE
 DATE SIGNED



Ohio State Emergency Response Commission
 c/o Ohio EPA, Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

Emergency and Hazardous Chemical Inventory Form

4.1 Facility Name: Bechtel-McLaughlin City: Sandusky County: Erie
 Exact Street Location (no box #'s): 3612 Milan Rd. Zip Code: 4487018

4.2 For Filing Date: 03/01/01 Check here if form and FACILITY MAP are Confidential and print "CONFIDENTIAL FORM" here:
 4.4 Check if Revision
 4.5 I Have Attached a Facility Map

CAS REGISTRY NO.	CHEMICAL DESCRIPTION	HAZARD CLASS										LOCATION OF CHEMICALS							AMOUNT					
		PURE	MIXTURE	COMPONENTS	EHS CHEMICAL	SOLID	LIQUID	GAS	TRADE SECRET	ACUTE	CHRONIC	FIRE	REACTIVE	RELEASE OF PRESSURE	B.T. OR A TANK OR BUILDING AREA NO.	DIVISION OR ROOM LETTER	FLOOR	STORAGE TYPE CODE	PRESSURE & TEMPERATURE CONDITIONS	LOCATION - CONFIDENTIAL	MAXIMUM	AVERAGE	UNITS	NO. OF DAYS ON SITE
7664-93-9	Sulfuric Acid		X	X	X				X			X			B01		1	V34	1,4		02	02	P	365
7664-93-9	Sulfuric Acid		X	X	X				X			X			B01		1	V35	1,4		02	02	P	365
7664-93-9	Sulfuric Acid		X	X	X				X			X			B01		1	V57	1,4		02	02	P	180
7664-93-9	Sulfuric Acid		X	X	X				X			X			B01		1	V58	1,4		02	02	P	180
7664-93-9	Sulfuric Acid		X	X	X				X			X			B01		1	V59	1,4		02	02	P	180

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NAME AND OFFICIAL TITLE OF OWNER OR OWNERS AUTHORIZED REPRESENTATIVE: Charles Ohlemacher-CEO SIGNATURE: _____ DATE SIGNED: _____



Ohio State Emergency Response Commission
 c/o Ohio EPA, Lazarus Government Center
 P.O. Box 1049, 122 South Front St.
 Columbus, Ohio 43216-1049

STAPLE

Emergency and Hazardous Chemical Inventory Form

Page 9 of 9 Pages

4.1 Facility Name Bechtel - McLaughlin City Sandusky County Erie
 Exact Street Location (no box #s) 3612 Milan Rd. Zip Code 4487018

4.2 For Filing Date: 03/01/01 Check here if form and FACILITY MAP are Confidential and print "CONFIDENTIAL FORM" here:
 4.4 Check if Revision
 4.5 I Have Attached a Facility Map

5.0 Chemical Description		Hazard Class							Location of Chemicals							Amount								
CAS REGISTRY NO.	SPECIFIC CHEMICAL NAME	PURE	MIXTURE	COMPONENTS	EHS CHEMICAL	SOLID	LIQUID	GAS	TRADE SECRET	ACUTE	CHRONIC	FLAMMABLE	REACTIVE	RELEASE OF PRESSURE	B.T. OR A. BUILDING, TANK OR AREA NO.	DIVISION OR ROOM LETTER	FLOOR	STORAGE TYPE CODE	PRESSURE & TEMPERATURE CONDITIONS	LOCATION - CONFIDENTIAL	MAXIMUM	AVERAGE	UNITS	NO. OF DAYS ON SITE
7664-93-9	Sulfuric Acid			X	X		X			X			X		B01		1	E03	1,4		01	01	P	365

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 _____, AND THAT BASED ON MY INQUIRY OF THOSE INDIVIDUALS RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE INFORMATION IS TRUE, ACCURATE, AND COMPLETE.

Charles Ohlemacher-CEO
 NAME AND OFFICIAL TITLE OF OWNER OR OWNERS AUTHORIZED REPRESENTATIVE
 SIGNATURE
 DATE SIGNED

Auto Phosphate Barrel Line / Line 1

	Material	Quantity / Gal.
V01	Drip Tank	N/A
V02	Heavy Oil	790
V03	Light Oil	790
V04	Hot Seal	790
V05	Soak Cleaner	920
V06	Soak Cleaner	920
V07	Rinse	820
V08	Rinse	820
V09	Acid	800
V10	Rinse	820
V11	Black Phosphate	810
V12	Rinse	820
V13	Rinse	820
V14	Rinse	820
V15	Rinse	820
V16	Phosphate	2200

- Sodium Hydroxide
- Sodium Hydroxide
- Hydrogen Chloride
- Hydrogen Chloride
- Hydrogen Chloride

Hand Phosphate Line / Line 2

	Material	Quantity / Gal.
V17	Oil	300
V18	Soak Cleaner	300
V19	Soak Cleaner	300
V20	Rinse	300
V21	Acid	300
V22	Rinse	300
V23	Rinse	300
V24	Heavy Phosphate	300
V25	Manganese Phosphate	300
V26	Light Phosphate	300
V27	Rinse	300
V28	Seal	300
V29	Phosphoric Acid	

- Sodium Hydroxide
- Sodium Hydroxide
- Sodium Hydroxide
- Hydrogen Chloride
- Hydrogen Chloride
- Nitric Acid
- Nitric Acid
- Nitric Acid

Double Barrel Zinc Line / Line 3

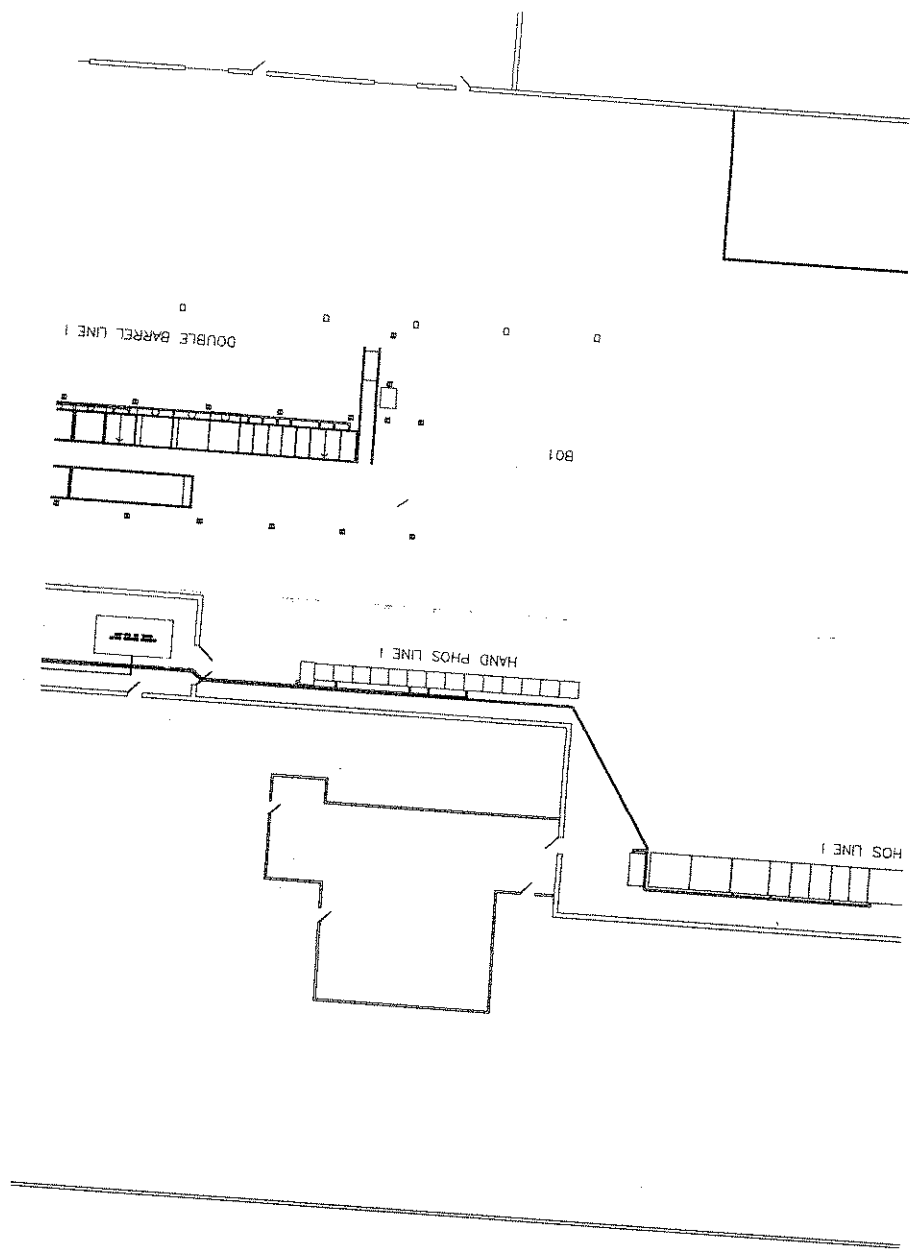
	Material	Quantity / Gal.
V30	Hot Rinse	400
V31	Rinse	400
V32	Rinse	400
V33	Olive Drab Chromate	400
V34	Yellow Chromate	400
V35	Clear Chromate	400
V36	Rinse	400
V37	Rinse	400
V38	Soak Cleaner	800
V39	Soak Cleaner	800
V40	Soak Cleaner	800
V41	Rinse	400
V42	Rinse	400
V43	Acid	800
V44	Acid	800
V45	Rinse	400
V46	Rinse	400
V47	Rinse	400
V48	Rinse	400
V49	Rinse	400
V50	Rinse	400
V51	Potassium Chloride	3100
V52	Potassium Chloride	3100

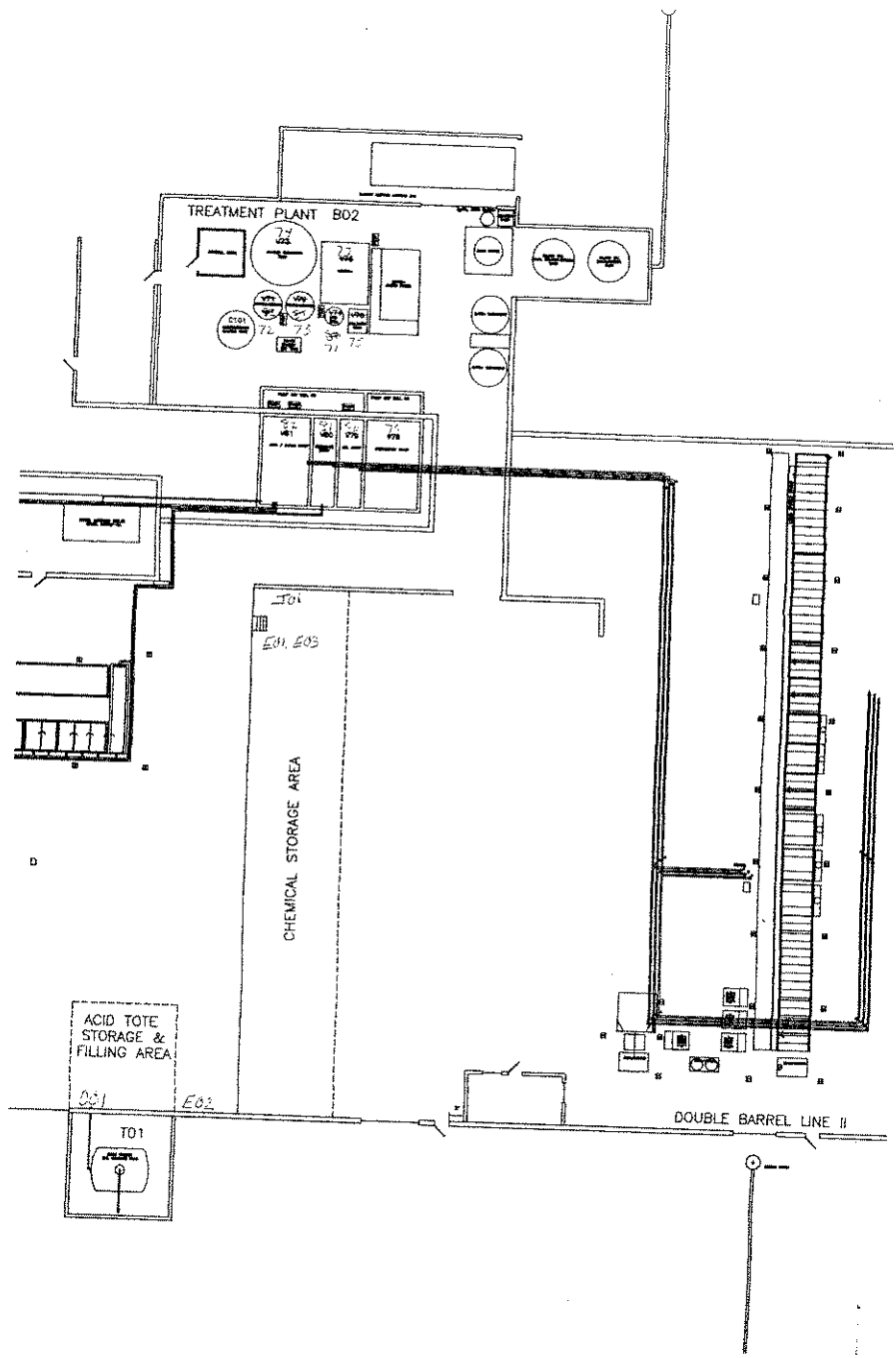
- Sulfuric Acid
- Sulfuric Acid
- Nitric Acid & Sulfuric Acid
- Sodium Hydroxide
- Sodium Hydroxide
- Sodium Hydroxide
- Sodium Hydroxide
- Hydrogen Chloride
- Hydrogen Chloride

Jessup Rack Zinc Line / Line 4

	Material	Quantity / Gal.
V53	Hot Rinse	1500
V54	Rinse	1500
V55	Rinse	1500
V56	Rinse	1500
V57	Chromate	1500
V58	Chromate	1500
V59	Bright Chromate	1500
V60	Rinse	1500
V61	Soak Cleaner	4500
V62	Soak Cleaner	1500
V63	Rinse	1500
V64	Acid	1500
V65	Rinse	1500
V66	Acid	1500
V67	Rinse	1500
V68	Rinse	1500
V69	Zinc	9000
V70	Zinc	9000

- Nitric Acid & Sulfuric Acid
- Nitric Acid & Sulfuric Acid
- Sulfuric Acid
- Sodium Hydroxide
- Sodium Hydroxide
- Sodium Hydroxide
- Hydrogen Chloride
- Hydrogen Chloride
- Hydrogen Chloride
- Sodium Hydroxide
- Sodium Hydroxide





Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Diane Mulvin FIRM: Sandusky Fire Department
FAX NO: 419-627-5820 HULL PROJECT CODE: HEM078
DATE 11/13/02 TIME: _____
RE: Information Request

Number of Pages (Including Cover Sheet)

THESE ARE TRANSMITTED:

For Your Use As Requested For Approval
 For Review & Comment For Your Information

The original of this facsimile will will not be sent to the recipient.

Notes: _____

Please disregard the fax received late yesterday. We have this exact address now rather than the intersection only. Thank you.

Copy To: _____ Sent By: Karyn Selle
Sent For: _____

If you have difficulty receiving this facsimile, please call (440) 519-2555 as soon as possible.

CAUTION

The information contained in this facsimile message is confidential and is intended solely for the use of the recipient named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution, or unauthorized use of this message is strictly prohibited. If you have received this message in error, please notify the sender by telephone and return the original facsimile to the sender at the above address via the United States Postal Service.



November 13, 2002

VIA FACSIMILE: 419/627-5820

Diane Mulvin
Sandusky Fire Department
600 West Market
Sandusky, OH 44870

Re: Request for File Search of Fire and Hazmat Responses at the Bechtel-McLaughlin, Inc. located at 3612 Milan Road in Sandusky, Ohio (Property). HEM078.600.0004

Dear Ms. Mulvin:

As part of phase I environmental assessment activities, Hull & Associates, Inc. is requesting a copy of all underground storage tank information, historic fire and hazardous material responses on file for Bechtel-McLaughlin, Inc. located at:

3612 Milan Road
Sandusky, Ohio

I have enclosed a map of the area of interest for your use.

If you have any questions, please do not hesitate to contact me at (440) 519-2555.

Sincerely,

A handwritten signature in cursive script, appearing to read "Karyn L. Selle".

Karyn L. Selle
Hydrogeologist I

ct: file

enclosure



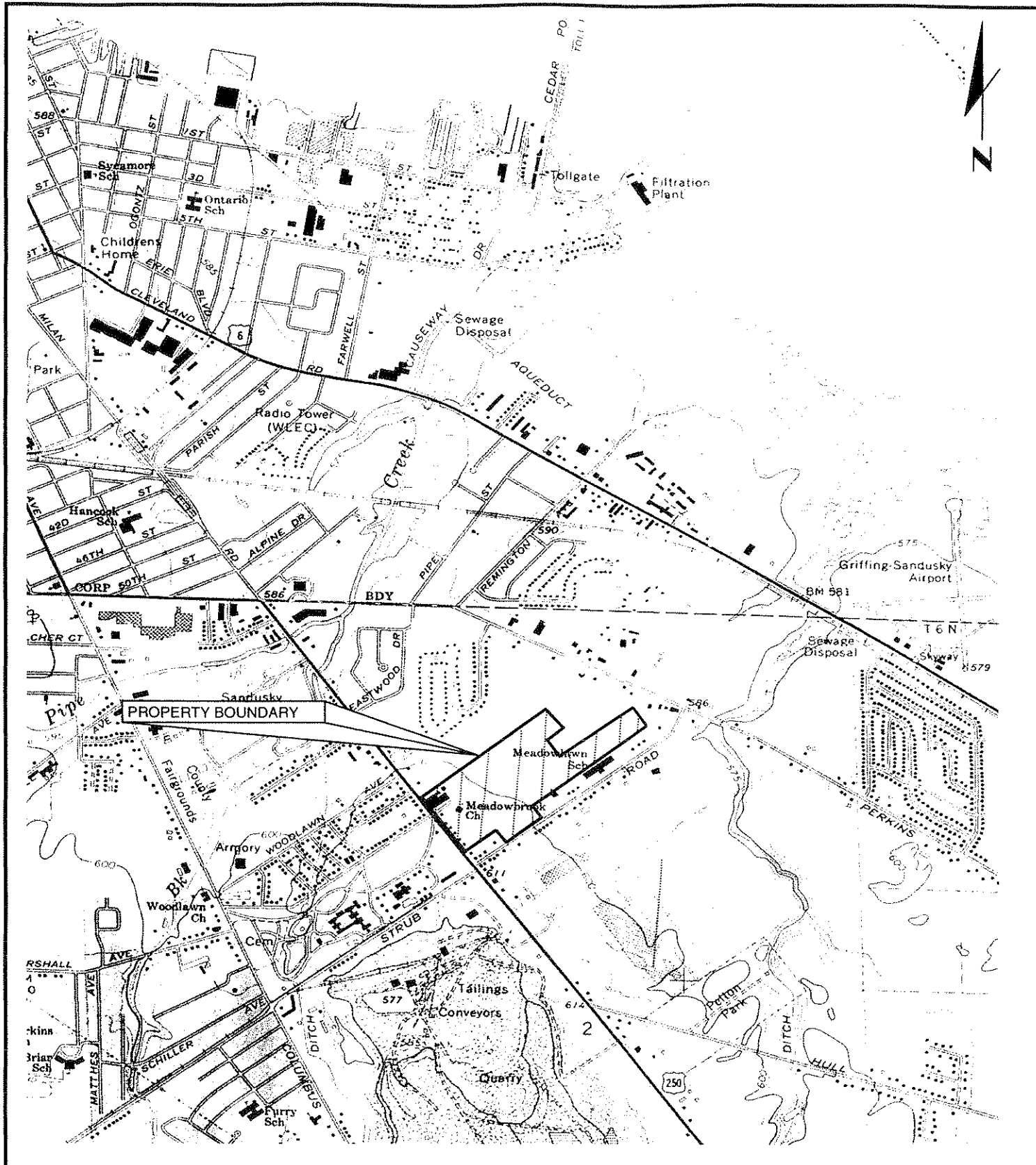


FIGURE 1

HULL & ASSOCIATES, INC.
 SOLON, OHIO

VAP ENVIRONMENTAL PROPERTY ASSESSMENT

PROPERTY LOCATION MAP

U.S. ROUTE 250 AND STRUB ROAD
 SANDUSKY, OH

DATE: NOVEMBER 2002

HEM078

SCALE 1" = 2000'

SOURCE: USGS 7.5 MIN QUADRANGLE

SANDUSKY, OH 1969
 (PHOTOREVISED 1979)

OHIC

QUADRANGLE LOCATION

HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
040	MEMORY TX		914196275820-582	03/03	OK

ERRORS

- 1) HANG UP OR LINE FAIL
- 2) BUSY
- 3) NO ANSWER
- 4) NO FACSIMILE CONNECTION

Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Diane Mulvin FIRM: Sandusky Fire Department
FAX NO: 419-627-5820 HULL PROJECT CODE: HEM078
DATE 11/12/02 TIME: _____
RE: Information Request

Number of Pages (Including Cover Sheet)

THESE ARE TRANSMITTED:

- For Your Use As Requested For Approval
 For Review & Comment For Your Information

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Copy To: _____ Sent By: Karyn Selle
_____ Sent For: _____

If you have difficulty receiving this facsimile, please call (440) 519-2555 as soon as possible.

CAUTION

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November 12, 2002

VIA FACSIMILE: 419/627-5820

Diane Mulvin
Sandusky Fire Department
600 West Market
Sandusky, OH 44870

Re: Request for File Search of Fire and Hazmat Responses at the 50 acre Property located at U.S. Route 250 and Strub Road in Sandusky, Ohio (Property). HEM078.600.0004

Dear Ms. Mulvin:

As part of phase I environmental assessment activities, Hull & Associates, Inc. is requesting a copy of all underground storage tank information, historic fire and hazardous material responses on file for the 50 acre Property located at:

U.S. Route 250 and Strub Road
Sandusky, Ohio

I have enclosed a map of the area of interest for your use.

If you have any questions, please do not hesitate to contact me at (440) 519-2555.

Sincerely,

Karyn L. Selle
Hydrogeologist I

ct: file

enclosure



HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
030	MEMORY TX		914196275820-476	03/03	OK

ERRORS

1) HANG UP OR LINE FAIL 2) BUSY 3) NO ANSWER 4) NO FACSIMILE CONNECTION

Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Karen Gerold FIRM: Erie County Health District
FAX NO: 419-624-3358 HULL PROJECT CODE: HEM078
DATE 11/12/02 TIME: _____
RE: Information Request

Number of Pages (Including Cover Sheet)

THESE ARE TRANSMITTED:

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 For Review & Comment For Your Information

The original of this facsimile will will not be sent to the recipient.

Notes: _____

Copy To: _____ Sent By: Karyn Selle
_____ Sent For: _____

If you have difficulty receiving this facsimile, please call (440) 519-2555 as soon as possible.

CAUTION

The information contained in this facsimile message is confidential and is intended solely for the use of the recipient named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution, or unauthorized use of this message is strictly prohibited. If you have received this message in error, please notify the sender by telephone and return the original facsimile to the sender at the above address via the United States Postal Service.



November 12, 2002

VIA FACSIMILE: 419/624-3358

Ms. Karen Gerold
Erie County Health District
Environmental Health Division
420 Superior
Sandusky, OH 44870

Re: Request for File Search: HEM078.600.0004.

Dear Ms. Gerold:

Please send me the results of a file search containing any information at the following address:

U.S. Route 250 and Strub Road
Sandusky, Ohio

I have enclosed a map showing the location of the Property and surrounding streets.

If you have any questions, please contact me at (440) 519-2555. Thank you for your assistance.

Sincerely,



Karyn L. Selle
Hydrogeologist I

ct: file

enclosure



Erie County

General Health District

Sandusky Office
420 Superior Street
P.O. Box 375
Sandusky, Ohio
44870

Telephone
419-626-5523
Toll Free
888-399-6165

Fax
Main Office
419-626-8778
Environmental Health Division
419-624-3358
Wastewater Division
419-626-1222

Family Practice Clinic
419-626-6174

Vermilion Office
625 Dayton Drive
Vermilion, Ohio
44089

Telephone
419-626-3358
Fax
419-626-6174

FAX COVER SHEET

DATE: 11-13-02

TO: Karyn Selle Hull & Associates

FAX NO: 440-519-2560

FROM: Karen Gradd, RS
Env. Health

COMMENTS:

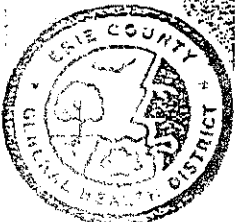
Strab + US 250

FAX NO. : 419-624-3358

NO. OF PAGES INCLUDING COVER SHEET: 2

CONFIDENTIALITY NOTICE:

This message is intended only for the use of the individual or entity to which it is addressed and may contain information that is privileged, confidential or exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are hereby notified that you are strictly prohibited from reading, disseminating, distributing or copying this communication. If you have received this communication in error, please notify us immediately by collect telephone. Call to the number indicated above and return the original message to us at the above address via U.S. Postal Service. Thank you.



Erie County**General Health
District**

Sandusky Office
420 Superior Street
P.O. Box 375
Sandusky, Ohio
44870

Telephone
419 - 626 - 5623
Toll Free
888 - 399 - 6065

Fax
Main Office
419 - 626 - 8778
Environmental
Health Division
419 - 624 - 3358
Nursing Division
419 - 626 - 1228

**Family Practice
Clinic**
419 - 626 - 6171

Vermilion Office
5345 Devon Drive
Vermilion, Ohio
44089

Telephone
440 - 967 - 7358
Fax
440 - 967 - 1637

This agency is an
equal provider of
services and an
equal employment
opportunity employer.
Civil Rights Act 1964
(CRA) M/F-H

**Prevention
of Illness,
Promotion
of Health**



November 13, 2002

Karyn L. Selle
Hull & Associates
6161 Cochran Road, Suite A
Solon, Ohio 44139

Dear Ms. Selle:

I have received and reviewed your request for information about the property fronting U S 250 on the east side just north of Strub Road and extending over 1,500 feet east, parallel to Strub Road.

Please be advised that the only information our agency has on file is in regards to routine inspections done at Meadowlawn School on East Strub Road for the school itself and its food service operation. Nothing in those reports has information about possible chemical spills, incidents, accidents, etc. that may have impacted the environment. The area has had municipal water service for many decades and sanitary sewer service for over 15 years.

For more information, please contact the Perkins Township Volunteer Fire Department (419-626-1334), Erie County Emergency Management Agency (419-627-7617), and the Ohio EPA Northwest District Office (419-352-8461).

If you have any questions, please contact me at our Sandusky Office, 419-626-5623 Ext. 102, weekdays, 8AM to 5PM.

Sincerely,

A handwritten signature in black ink, appearing to read "Karen M. Gerold". The signature is fluid and cursive.

Karen M. Gerold, R.S.
Director, Environmental Health

HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
025	MEMORY TX		914196243358-582	03/03	OK

ERRORS

- 1) HANG UP OR LINE FAIL 2) BUSY 3) NO ANSWER 4) NO FACSIMILE CONNECTION

Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Rick Hertz FIRM: ODOT-Aerial Eng.
FAX NO: 614-275-1673 HULL PROJECT CODE: HEM078
DATE 11/12/02 TIME: _____
RE: Aerial Photos

Number of Pages (Including Cover Sheet)

THESE ARE TRANSMITTED:

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 For Review & Comment For Your Information

The original of this facsimile will will not be sent to the recipient.

Notes: _____

Please provide aerial photo coverage for attached site location. Thanks.

Copy To: _____ Sent By: Karyn Selle
_____ Sent For: _____

If you have difficulty receiving this facsimile, please call (440) 519-2555 as soon as possible.

CAUTION

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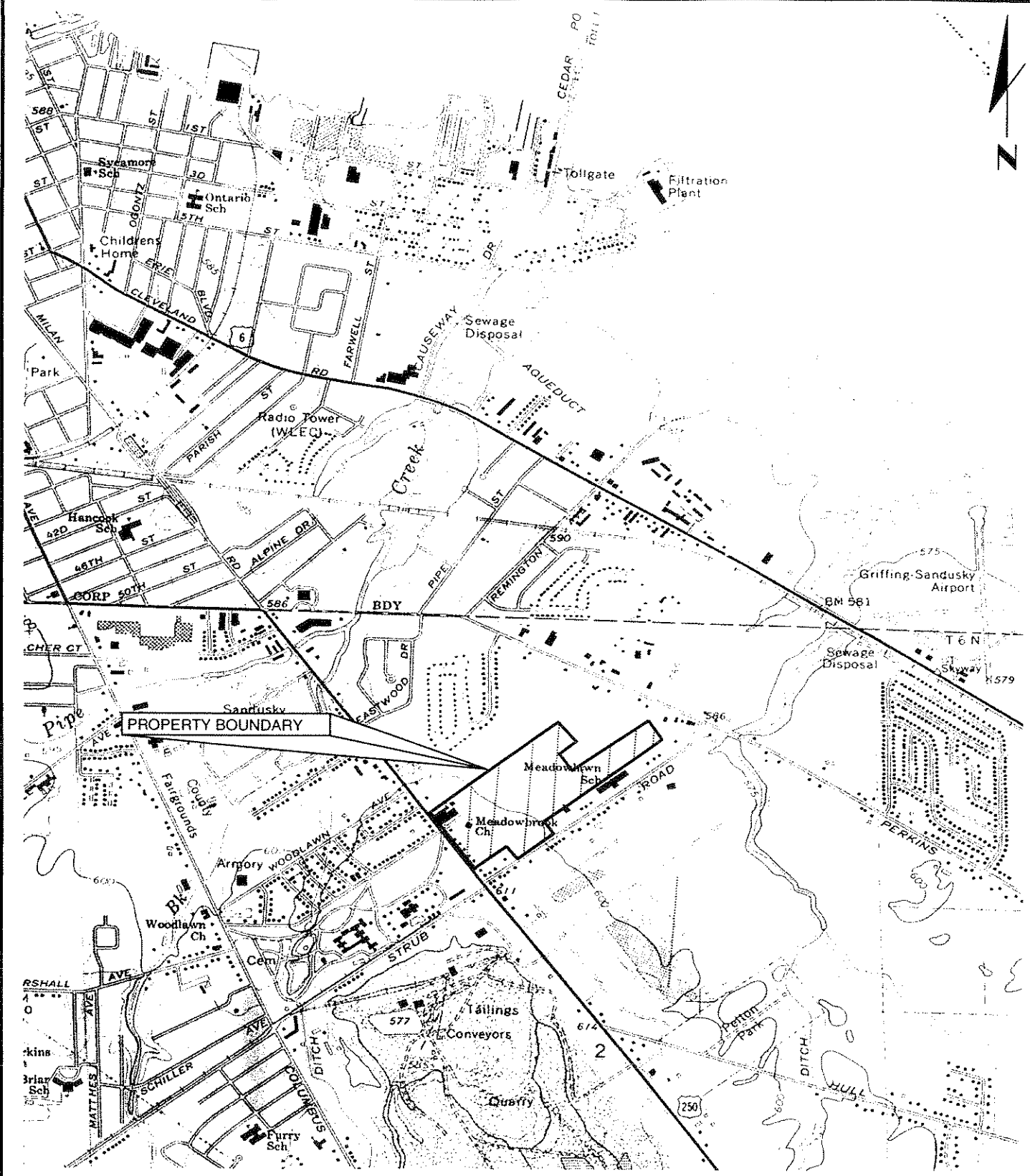


FIGURE 1

HULL & ASSOCIATES, INC.
 SOLON, OHIO

VAP ENVIRONMENTAL PROPERTY ASSESSMENT

PROPERTY LOCATION MAP

U.S. ROUTE 250 AND STRUB ROAD
 SANDUSKY, OH

DATE: NOVEMBER 2002

HEM078

SCALE 1" = 2000'
 SOURCE: USGS 7.5 MIN QUADRANGLE

SANDUSKY, OH 1969
 (PHOTOREVISED 1979)

QUADRANGLE LOCATION



HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
028	MEMORY TX		916142751673-582	02/02	OK

ERRORS

- 1) HANG UP OR LINE FAIL 2) BUSY 3) NO ANSWER 4) NO FACSIMILE CONNECTION

Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Rick Hertz FIRM: ODOT-Aerial Engineering
FAX NO: 614-275-1673 HULL PROJECT CODE: HEM078
DATE: 11/15/02 TIME: _____
RE: Aerial Photos

Number of Pages (Including Cover Sheet) 3

THESE ARE TRANSMITTED:

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 For Review & Comment For Your Information

The original of this facsimile will will not be sent to the recipient.

Notes: _____

I would like the marked photos at 1:400 scale. _____

Thank you. _____

Copy To: _____ Sent By: Karyn Selle
_____ Sent For: _____

If you have difficulty receiving this facsimile, please call (440) 519-2555 as soon as possible.

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5225.6

**OHIO DEPT. OF TRANSPORTATION
OFFICE OF AERIAL ENGINEERING
1602 WEST BROAD STREET
COLUMBUS, OHIO 43223
PH: (614) 275-1359 FAX: (614) 275-1673**

TO: *KARYN SELLE* FAX: *440/579-2560*
COMPANY: *HULL + ASSOC* PROJ/PO# *HEM*

SITE: *SANDUSKY - US 250*

AERIAL PHOTOGRAPHY RESEARCH LOG

DATE OF PHOTOGRAPH	FLIGHT	STRIP	NEGATIVE	SCALE FEET/INCH	ROLL
<i>4/88</i>	<i>NAPP</i>	<i>579</i>	<i>50</i>	<i>3333</i>	<i>254 1:400</i>
<i>3/77</i>	<i>VEHP</i>	<i>1</i>	<i>93</i>	<i>6667</i>	<i>169 1:400</i>
<i>10/74</i>	<i>5562</i>	<i>1</i>	<i>1</i>	<i>2000</i>	<i>1:400</i>
<i>6/73</i>	<i>5258</i>	<i>1</i>	<i>7</i>	<i>2000</i>	<i>1:400</i>
<i>6/66</i>	<i>3338</i>	<i>2</i>	<i>21</i>	<i>1000</i>	<i>1:400</i>
<i>9/64</i>	<i>2910</i>	<i>6</i>	<i>86</i>	<i>1600</i>	<i>1:400</i>
<i>11/60</i>	<i>1741</i>	<i>3</i>	<i>47</i>	<i>800</i>	<i>1:400</i>
<i>5/56</i>	<i>733</i>	<i>6</i>	<i>132</i>	<i>800</i>	<i>1:400</i>
<i>10/50</i>	<i>322</i>	<i>2</i>	<i>20</i>	<i>800</i>	<i>1:400</i>

ERI. CO.

PLEASE NOTE: ALL PRODUCTS ARE CUSTOM MADE PER YOUR ORDER AND REQUIRE A MINIMUM OF A 7 TO 10 WORKING DAYS PRODUCTION TIME SCHEDULE. ALL PHOTOGRAPHY MUST BE PRE-PAID

IF YOU WISH TO ORDER, PLEASE CALL (614) 275-1369 OR FAX (614) 275-1673
PAGE 1 OF 2

141.30

sent 11/14/02
RAM

**OHIO DEPT. OF TRANSPORTATION
OFFICE OF AERIAL ENGINEERING
1602 WEST BROAD STREET
COLUMBUS, OHIO 43223
PH: (614) 275-1359 FAX: (614) 275-1673**

TO: <u>KARIN SELLE</u>	FAX:
COMPANY: <u>MULLER ASSOC.</u>	PROJ/PO#

SITE: SANOUSKY

AERIAL PHOTOGRAPHY RESEARCH LOG

DATE OF PHOTOGRAPH	FLIGHT	STRIP	NEGATIVE	SCALE FEET/INCH
5/02	10838	2	4	800
5/00	10510	1	1	800
5/98	10179	1	3	800
9/95	9486	2	4	800
9/90	8665	2	6	800
11/81	7056	1	1	1500

ERI-co.

ROLL

• 1:400

• 1:400

MOST OF SITE

PLEASE NOTE: ALL PRODUCTS ARE CUSTOM MADE PER YOUR ORDER AND REQUIRE A MINIMUM OF A 7 TO 10 WORKING DAYS PRODUCTION TIME SCHEDULE.
ALL PHOTOGRAPHY MUST BE PRE-PAID

IF YOU WISH TO ORDER, PLEASE CALL (614) 275-1369 OR FAX (614) 275-1673
PAGE 2 OF 2

HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
073	MEMORY TX		916142751673-582	03/03	OK

ERRORS

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Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Mr. Braun FIRM: SWCD-Erie County
FAX NO: 419-609-9707 HULL PROJECT CODE: HEM078
DATE 12/18/02 TIME: 10:00 a.m.
RE: Information Request

Number of Pages (Including Cover Sheet) 2

THESE ARE TRANSMITTED:

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 For Review & Comment For Your Information

The original of this facsimile will will not be sent to the recipient.

Notes: _____

Mr. Braun, _____

Please fax me back the soil survey book data for the area shown on the attached Property location map. Please include relevant bibliographic information (author, date of publication, etc.) _____

Thank-you so much for all of your help. _____

Kelly Kester _____

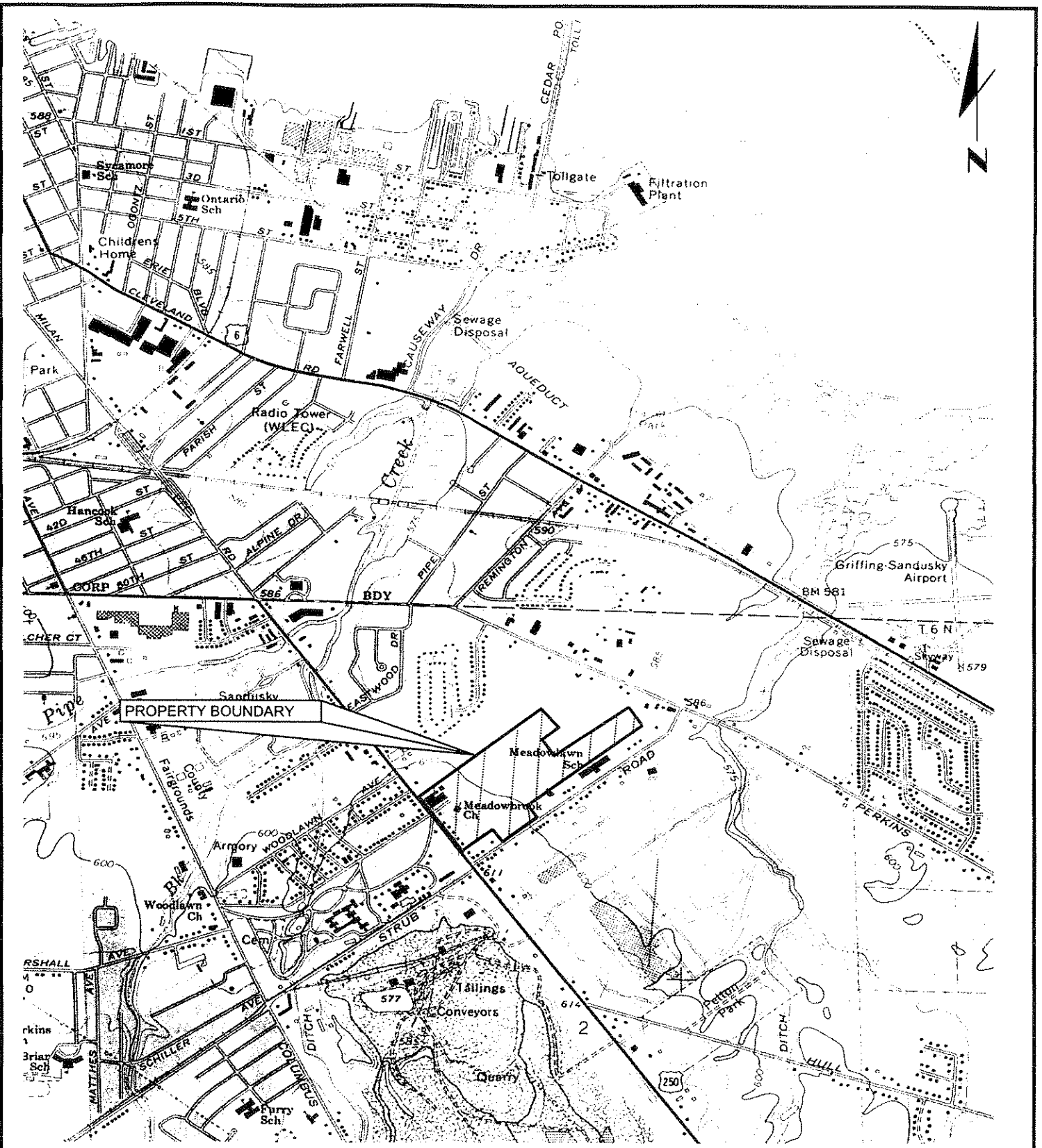
Copy To: _____ Sent By: _____

Sent For: _____

If you have difficulty receiving this facsimile, please call (440) 519-2555 as soon as possible.

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SCALE 1" = 2000'
 SOURCE: USGS 7.5 MIN QUADRANGLE

SANDUSKY, OH 1969
 (PHOTOREVISED 1979)

FIGURE 1

HULL & ASSOCIATES, INC.
 SOLON, OHIO

VAP ENVIRONMENTAL PROPERTY ASSESSMENT
PROPERTY LOCATION MAP
 Bechtel-McLaughlin, Inc.

3612 Milan Road
 SANDUSKY, OH

DATE: DECEMBER 2002

HEM079

HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
004	MEMORY TX		914196099707-540	02/02	OK

ERRORS

- 1) HANG UP OR LINE FAIL
- 2) BUSY
- 3) NO ANSWER
- 4) NO FACSIMILE CONNECTION

Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET



TO: Mr. Braun FIRM: SWCD-Erie County
FAX NO: 419-609-9707 HULL PROJECT CODE: HEM078
DATE: 12/16/02 TIME: 2:15
RE: Information Request

Number of Pages (Including Cover Sheet)

THESE ARE TRANSMITTED:

- For Your Use As Requested For Approval
 For Review & Comment For Your Information

The original of this facsimile will will not be sent to the recipient.

Notes: _____

Mr. Braun, _____

Please fax the appropriate Wetlands map back to me. Please include a title block or legend to show what area the map is referencing. Thank you very much for your help.

Karyn Selle _____

Copy To: _____ Sent By: Karyn Selle
Sent For: _____

If you have difficulty receiving this facsimile, please call (440) 519-2555 as soon as possible.

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HULL & ASSOCIATES

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FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
059	MEMORY TX		914196099707-540	02/02	OK

ERRORS

- 1) HANG UP OR LINE FAIL
- 2) BUSY
- 3) NO ANSWER
- 4) NO FACSIMILE CONNECTION



ERIE SOIL and WATER CONSERVATION DISTRICT
 2900 COLUMBUS AVENUE ROOM 131
 SANDUSKY OH 44870-5554
 PHONE: 419-626-5211 FAX: 419-609-9707

FAX COVER SHEET

DATE: Dec. 17, 2002

TO: Katryn Selle
Hull + Associates, Inc.

FAX NUMBER: 440-519-2560

PAGE AMOUNT: 3 (including fax sheet)

FROM: Dave Braun

REMARKS: Katryn: Hope this works for you, if not
let me know what else you need.

Erie Soil and Water Conservation District is an Equal Opportunity Employer

Hull

& associates, inc.

6161 Cochran Road, Suite A • Solon, Ohio 44139 • (440) 519-2555 • (440) 519-2560 fax

FACSIMILE COVER SHEET

TO: Madge Fitrak FIRM: ODNR Division of Geologic Survey
FAX NO: 614-447-1918 HULL PROJECT CODE: HEM078
DATE: 11/13/02 ~~REPORTS-40~~ TIME: 12-5-02
RE: Oil and Gas Well Log Search

Number of Pages (Including Cover Sheet) 8

THESE ARE TRANSMITTED:

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 For Review & Comment For Your Information

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Notes: Ms. Fitrak,

Please conduct a well log search with in a half-mile radius around attached site. Please include
well cards, an oil and gas map and any available plugging information. completed already / fax reviewed

Thank you.

Ms. Fitrak,

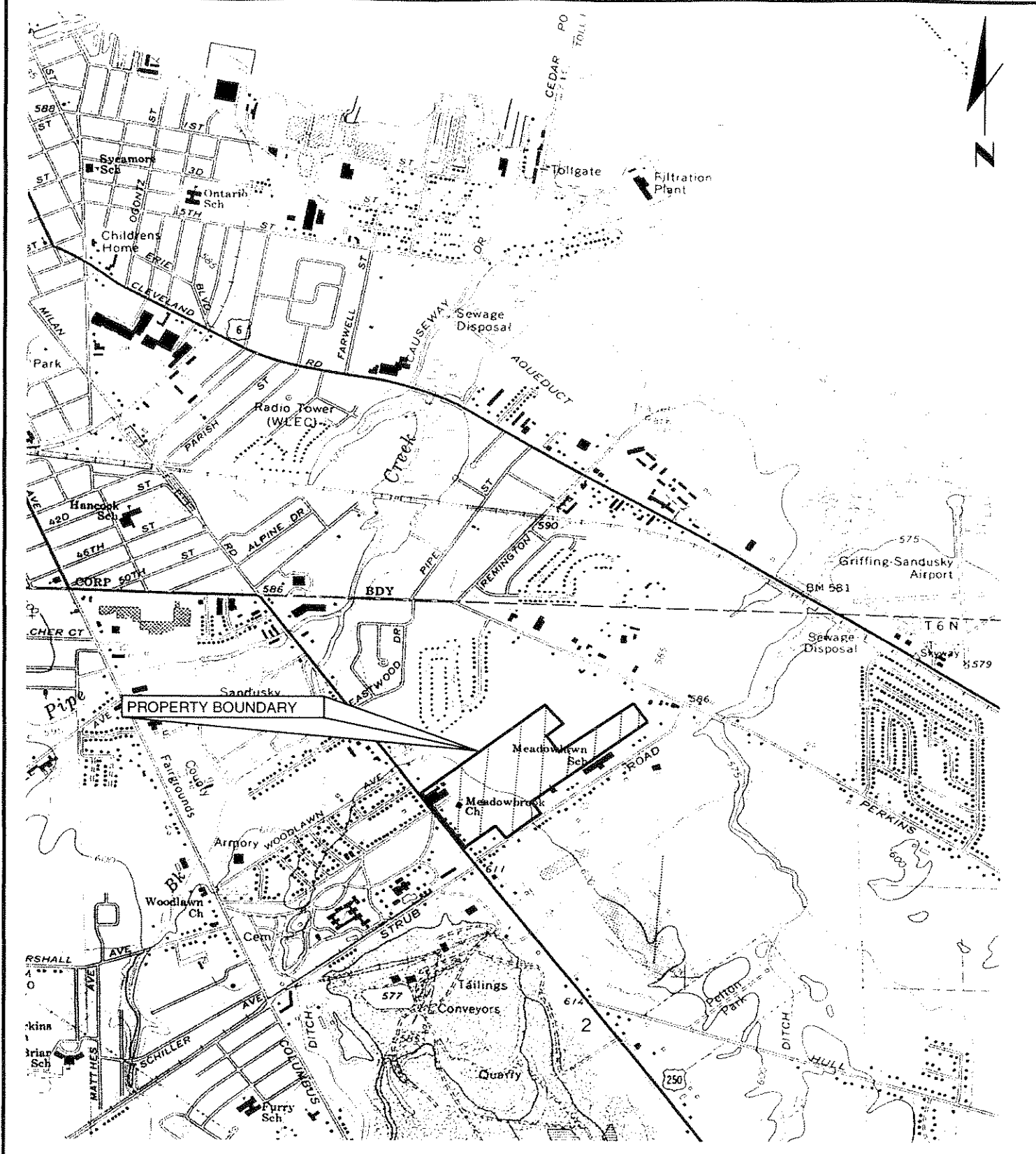
I am in need of Bedrock Geology, Bedrock
topo map, water resources and water pollution potential.
Please call or ^{fax} email if you can be of assistance.

Copy To: _____ Sent By: Karyn Selle
Sent For: _____

If you have difficulty receiving this facsimile, please call (440) 519-2555 as soon as possible.

CAUTION

The information contained in this facsimile message is confidential and is intended solely for the use of the recipient named above. If the reader of this message is not the intended recipient, or the employee or agent responsible for delivering it to the intended recipient, you are hereby notified that any dissemination, distribution, or unauthorized use of this message is strictly prohibited. If you have received this message in error, please notify the sender by telephone and return the original facsimile to the sender at the above address via the United States Postal Service.



QUADRANGLE LOCATION

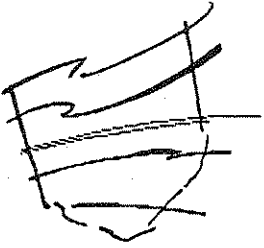
OHIO

SCALE 1" = 2000'
 SOURCE: USGS 7.5 MIN QUADRANGLE

SANDUSKY, OH 1969
 (PHOTOREVISED 1979)

<p>FIGURE 1 HULL & ASSOCIATES, INC. SOLON, OHIO</p>
<p>VAP ENVIRONMENTAL PROPERTY ASSESSMENT</p>
<p>PROPERTY LOCATION MAP U.S. ROUTE 250 AND STRUB ROAD SANDUSKY, OH</p>
<p>DATE: NOVEMBER 2002</p>

HEM078



DIVISION OF GEOLOGICAL SURVEY
OHIO DEPARTMENT OF NATURAL RESOURCES
4383 FOUNTAIN SQUARE DRIVE
COLUMBUS, OHIO 43224-1362



GEO FAX

TO: Karyn Selle
FROM: Madge Fitak

COMPANY: Hull & Assoc	ODNR DATE: 12-05-02	TIME: 3:20 PM
FAX NUMBER: 440-519-2560	TOTAL NO. OF PAGES INCLUDING COVER: 1	
PHONE NUMBER:	SENDER'S FAX NUMBER: 614-447-1918	
RE: HEM078	SENDER'S PHONE NUMBER: 614-265-6576	

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:

HEM078

The Ohio Geological Survey has available Bedrock Geology and a Bedrock Topography map for the Sandusky quadrangle. Each map is \$4.00 plus tax and shipping. The total for two maps folded is \$10.96. Rolled is \$12.46.

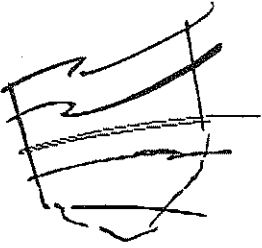
Orders may be placed over the phone, by mail or fax using Visa or MasterCard. A check with your request may also be sent to the address below. Please make the check payable to Ohio Geological Survey. Checks must be drawn on an American bank.

Groundwater maps and pollution potential maps are available from the Division of Water. Their fax number is 614-265-6767. The phone number is 614-265-6740.

If you have additional questions please contact me at any time.

Madge
 Ohio Geological Survey
 4383 Fountain Square Drive
 Columbus, Ohio 43224
 Phone: 614-265-6576
 Fax: 614-447-1918
 Website: [http:// www.ohiodnr.com/geosurvey/](http://www.ohiodnr.com/geosurvey/)
 e-mail: madge.fitak@dnr.state.oh.us

Madge Fitak
 Geologic Records Center



DIVISION OF GEOLOGICAL SURVEY
OHIO DEPARTMENT OF NATURAL RESOURCES
4383 FOUNTAIN SQUARE DRIVE
COLUMBUS, OHIO 43224-1362



GEO FAX

TO: Karyn Selle
FROM: Madge Fitak

COMPANY: Hull & Assoc	ODNR DATE: 12-05-02	TIME: 8:20 AM
FAX NUMBER: 440-519-2560	TOTAL NO. OF PAGES INCLUDING COVER: 1	
PHONE NUMBER:	SENDER'S FAX NUMBER: 614-447-1918	
RE: HEM078	SENDER'S PHONE NUMBER: 614-265-6576	

URGENT FOR REVIEW PLEASE COMMENT PLEASE REPLY PLEASE RECYCLE

NOTES/COMMENTS:

I am sorry you did not get the original fax.

HEM078

Your site is located in Perkins Township, Erie County. There are no known wells in that township.

Madge Fitak
 Geologic Records Center

HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
042	MEMORY TX		916144471918-582	02/02	OK

ERRORS

- 1) HANG UP OR LINE FAIL
- 2) BUSY
- 3) NO ANSWER
- 4) NO FACSIMILE CONNECTION

HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
063	MEMORY TX		916144471918*476	02/02	OK

ERRORS

- 1) HANG UP OR LINE FAIL
- 2) BUSY
- 3) NO ANSWER
- 4) NO FACSIMILE CONNECTION

HULL & ASSOCIATES

(AUTO)

THE FOLLOWING FILE(S) ERASED

FILE	FILE TYPE	OPTION	TEL NO.	PAGE	RESULT
095	MEMORY TX		916144471918-338	02/02	OK

ERRORS

- 1) HANG UP OR LINE FAIL 2) BUSY 3) NO ANSWER 4) NO FACSIMILE CONNECTION



Erie County

**General Health
District**

Sandusky Office
420 Superior Street
P.O. Box 375
Sandusky, Ohio
44870

Telephone
419 - 626 - 5623
Toll Free
888 - 399 - 6065

Fax
Main Office
419 - 626 - 8778
**Environmental
Health Division**
419 - 624 - 3358
Nursing Division
419 - 626 - 1228

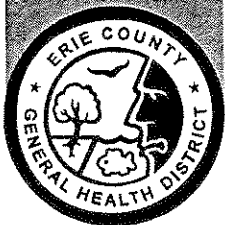
**Family Practice
Clinic**
419 - 626 - 6171

Vermillion Office
5345 Devon Drive
Vermillion, Ohio
44089

Telephone
440 - 967 - 7359
Fax
440 - 967 - 1637

"This agency is an
equal provider of
services and an
equal employment
opportunity employer -
Civil Rights Act 1964
(CRA) M/F-H

**Prevention
of Illness,
Promotion
of Health**



November 13, 2002

Karyn L. Selle
Hull & Associates
6161 Cochran Road, Suite A
Solon, Ohio 44139

Dear Ms. Selle:

I have received and reviewed your request for information about the property fronting U S 250 on the east side just north of Strub Road and extending over 1,500 feet east, parallel to Strub Road.

Please be advised that the only information our agency has on file is in regards to routine inspections done at Meadowlawn School on East Strub Road for the school itself and its food service operation. Nothing in those reports has information about possible chemical spills, incidents, accidents, etc. that may have impacted the environment. The area has had municipal water service for many decades and sanitary sewer service for over 15 years.

For more information, please contact the Perkins Township Volunteer Fire Department (419-626-1334), Erie County Emergency Management Agency (419-627-7617), and the Ohio EPA Northwest District Office (419-352-8461).

If you have any questions, please contact me at our Sandusky Office, 419-626-5623 Ext. 102, weekdays, 8AM to 5PM.

Sincerely,

Karen M. Gerold, R.S.
Director, Environmental Health

NOV 14 REC'D

APPENDIX G

FIRM/Wetlands Maps



APPROXIMATE SCALE



NATIONAL FLOOD INSURANCE PROGRAM

FIRM FLOOD INSURANCE RATE MAP

COUNTY OF
**ERIE,
OHIO**
(UNINCORPORATED AREAS)

PANEL 55 OF 110
(SEE MAP INDEX FOR PANELS NOT PRINTED)

NOTE:
THIS MAP INCORPORATES APPROXIMATE BOUNDARIES OF
COASTAL BARRIER RESOURCES SYSTEM UNITS AND/OR
OTHERWISE PROTECTED AREAS ESTABLISHED UNDER THE
COASTAL BARRIER IMPROVEMENT ACT OF 1960 (P.L. 101-581)

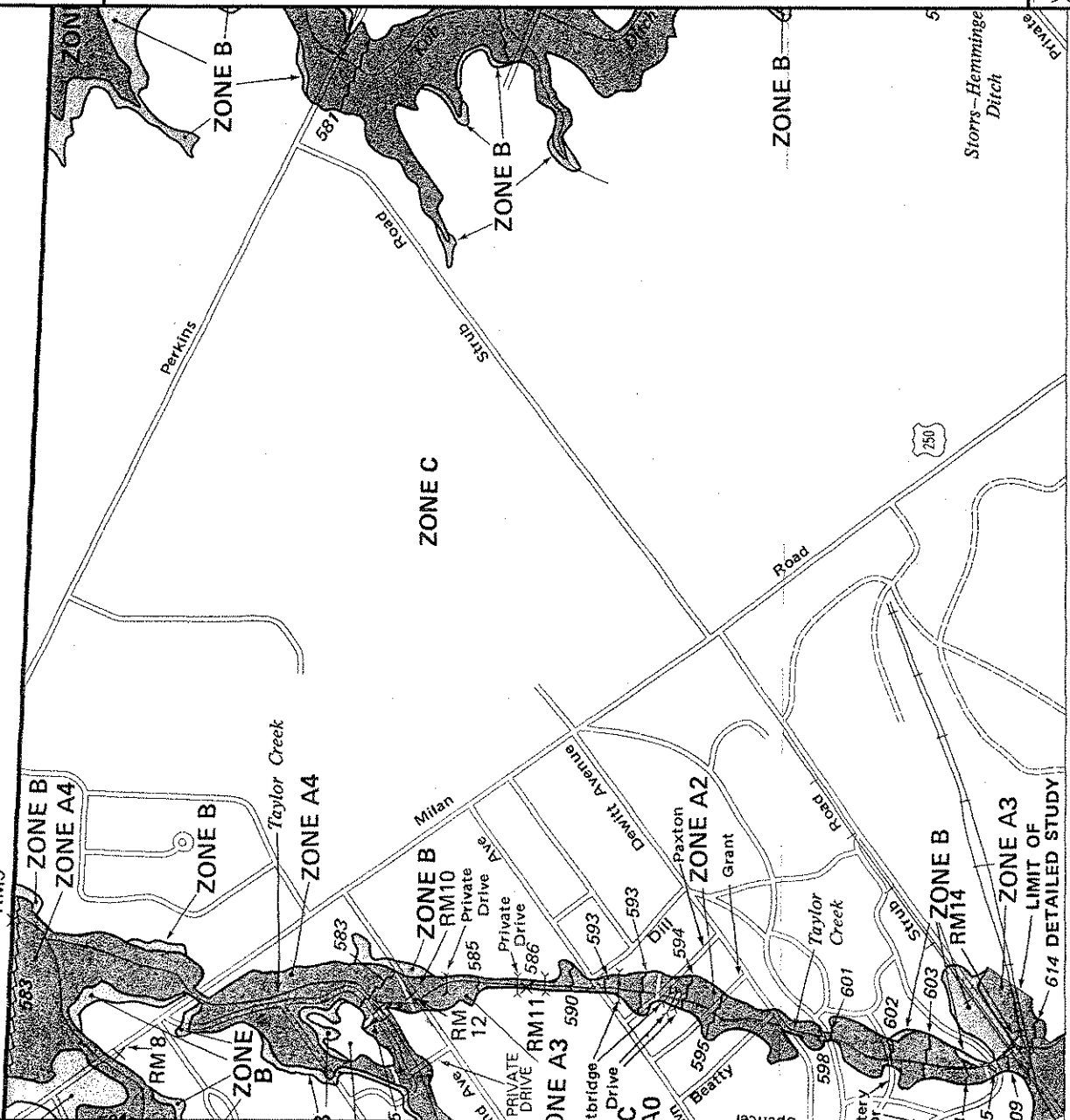
COMMUNITY-PANEL NUMBER
390153 0055 C

MAP REVISED:
SEPTEMBER 20, 1995

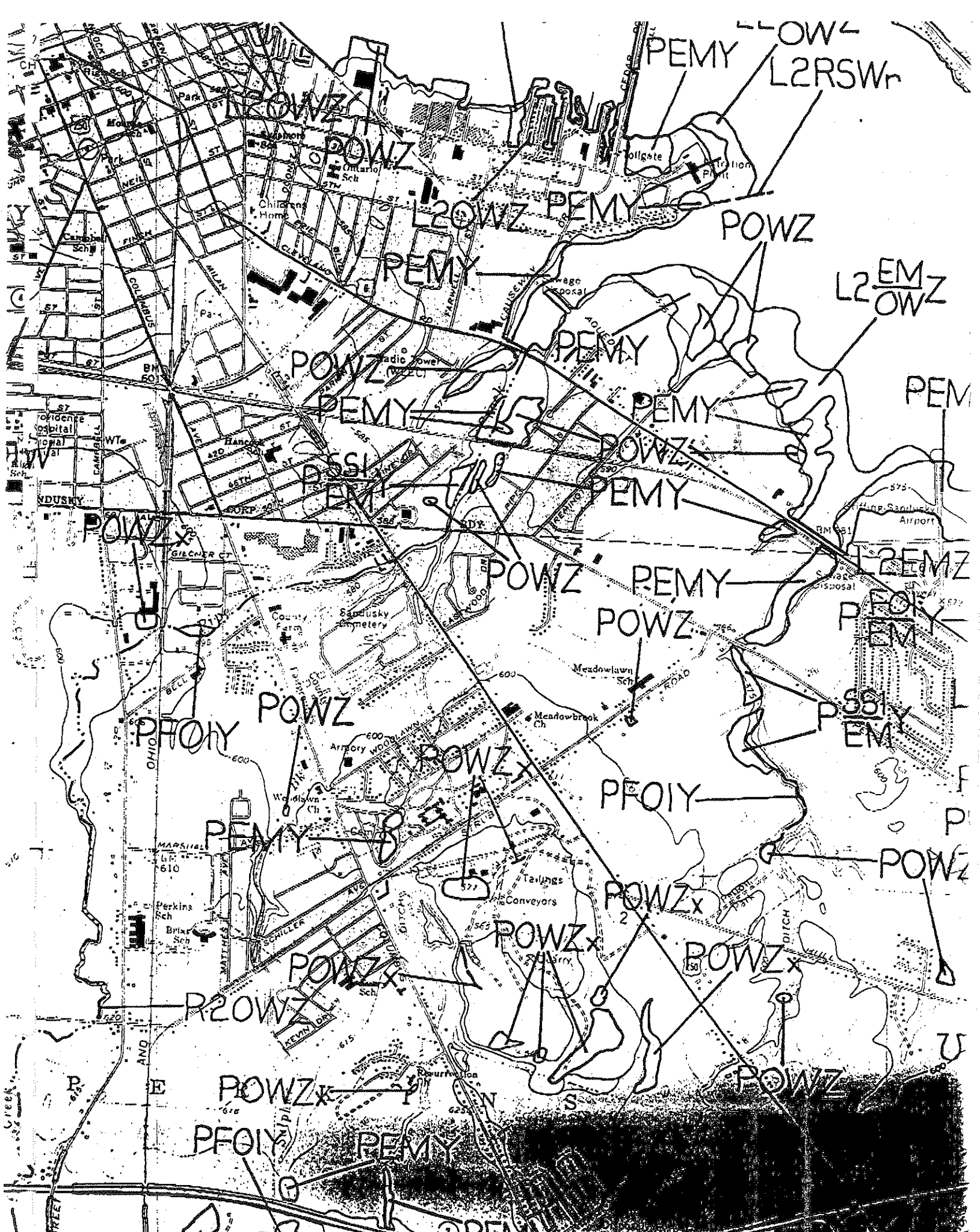


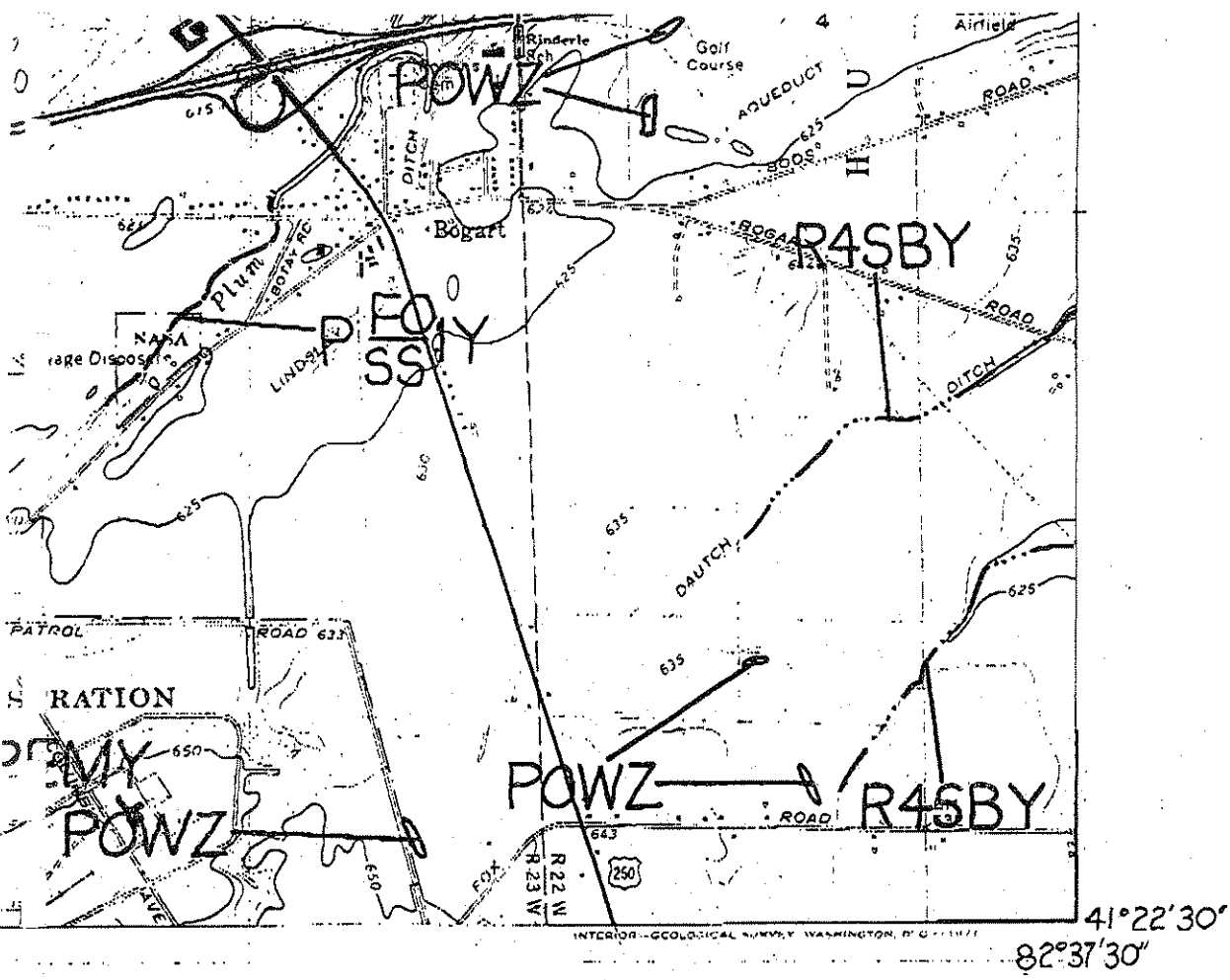
Federal Emergency Management Agency

This is an official copy of a portion of the above referenced flood map. It was extracted using F-MIT On-Line. This map does not reflect changes or amendments which may have been made subsequent to the date on the title block. For the latest product information about National Flood Insurance Program flood maps check the FEMA Flood Map Store at www.msc.fema.gov



614 DETAILED STUDY





SANDUSKY, OHIO

NOTES TO THE USER

- Wetlands which have been field examined are indicated on the map by an asterisk (*).
- Dominance type (either vegetative or sedentary animal) can be added to the map by the interested user.
- Additions or corrections to the wetlands information displayed on this map are solicited. Please forward such information to the address indicated.



AERIAL PHOTOGRAPHY

DATE: 3 / 1 / 77
 SCALE: 1: 80 000
 TYPE: B-W
 DATE: / /
 SCALE: _____
 TYPE: _____
 DATE: / /
 SCALE: _____
 TYPE: _____

U.S. DEPARTMENT OF THE INTERIOR

FISH AND WILDLIFE SERVICE

Prepared by Office of Biological Services
 for the National Wetlands Inventory