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**PHASE I  
ENVIRONMENTAL SITE ASSESSMENT  
REPORT**



**G.E.G. of Indiana Property  
1010 Keller Drive  
New Salisbury, Harrison County, Indiana**

**September 19, 2011**

**Prepared by:**



**Linebach ■ Funkhouser, Inc.**  
*environmental compliance & consulting*

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September 19, 2011

Mr. David Seewer  
Wyatt, Tarrant & Combs, LLP  
PNC Plaza  
500 West Jefferson Street, Suite 2800  
Louisville, Kentucky 40202

**Re: *Phase I Environmental Site Assessment Report  
G.E.G. of Indiana Property  
1010 Keller Drive  
New Salisbury, Harrison County, Indiana  
Linebach Funkhouser Project #196-11***

Dear Mr. Seewer:

Linebach Funkhouser, Inc. (LFI) is submitting the enclosed *Phase I Environmental Site Assessment Report* for the above-referenced facility. The assessment activities included a site reconnaissance, interviews with persons knowledgeable about the site, a review of available literature, maps, historical information, and a review of the local, state and federal regulatory agency files regarding the site. The attached report documents the conditions encountered during the assessment and presents our summary and recommendations relative to the site.

We appreciate the opportunity to provide our services to Wyatt, Tarrant & Combs, LLP. Please contact us if you have any questions or comments regarding this submittal, or if we can be of additional service to you.

Sincerely,

Brendan P. Merk, L.P.G.  
Senior Hydrogeologist

Charles D. Linebach, CHMM  
Principal

Enclosure

## EXECUTIVE SUMMARY

Linebach Funkhouser, Inc. (LFI) has completed a Phase I Environmental Site Assessment (ESA) for the commercial property located at 1010 Keller Drive in New Salisbury, Harrison County, Indiana. The assessment was conducted in conformance with the scope and limitations of the U.S. Environmental Protection Agency's (EPA's) *Standards and Practices for All Appropriate Inquiries* (AAI) (40 CFR Part 312). The primary objective of the ESA was to identify the conditions indicative of releases or threatened releases of hazardous materials or petroleum products as defined in the AAI standards. Results of the assessment, which included a site reconnaissance, a review of historical information, a review of federal, state and local records, as well as interviews with persons knowledgeable about the site, are summarized as follows:

Report Section/ Page No.	Environmental Related Item	Description	Releases/ Threatened Releases (TR)
2.0/Page 3	<b>SITE/AREA DESCRIPTION</b>		NO
3.0/Page 5	<b>SITE HISTORY AND HISTORICAL RECORDS REVIEW</b>		NO
3.1/ Page 5	Past Uses of Property	Commercial	NO
3.2/Page 6	Past Uses of Adjoining Properties	Undeveloped/Residential	NO
4.0/Page 9	<b>ENVIRONMENTAL RECORDS REVIEW</b>		NO
5.0/Page 11	<b>SITE RECONNAISSANCE</b>		NO
5.3/Page 12	Hazardous Substances and Petroleum Products	Used oil, new oil, paint, sodium hydroxide and other limited petroleum products.	NO
5.4/Page 13	Solid and Hazardous Waste Management	Buried sawdust, dumpster of boiler residual ash.	NO
5.5/Page 13	Underground Storage Tanks (USTs)	None	NO
5.6/Page 14	Above Ground Storage Tanks (ASTs)	200 gallon diesel AST in pump house	NO
5.8/5.9/ Page 14	Pits, Ponds, Lagoons, Drains, Sumps	Floor drains in office areas drain to sewage area.	NO
5.10/5.11/ Page 14-15	Wastewater Management	On-site sewage treatment area.	NO
5.16/ Page 15	Asbestos Containing Materials (ACMs)	None observed. Offices remodeled in 2005.	NO
5.17/ Page 16	Vapor Intrusion	None suspected	NO
5.18/Page 16	Other Environmental Concerns	None	NO
6.0/Page 17	<b>INTERVIEWS</b>		NO
6.1/Page 17	Site Contact	Mr. Ed Bell	NO
7.0/Page 17	<b>USER PROVIDER INFORMATION</b>		NO
8.0/Page 18	Data Gaps	Four (4)	NO
9.0/Page 18	<b>(DETAILED) SUMMARY AND RECOMMENDATIONS</b>		

### ***Conclusion & Recommendations***

Based on evaluation of available environmental information relative to the subject site and our site reconnaissance, we did not identify obvious environmental concerns at the subject property. Therefore, we do not recommend additional assessment at this time.

This Executive Summary of the results of the Phase I ESA is not intended to be all-inclusive. The complete Report lists the procedures used during our assessment and provides our recommendations regarding the site.

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- Appendix C – EDR Aerial Photo Report
- Appendix D – Certified Sanborn Map Report
- Appendix E – EDR City Directory Report
- Appendix F – Property Valuation Information
- Appendix G – The EDR Radius Map Report
- Appendix H – Open Records Information and Previous Phase I/II Reports

## 1.0 INTRODUCTION

Linebach Funkhouser, Inc. (LFI) was retained by Wyatt, Tarrant & Combs, LLP to conduct a Phase I Environmental Site Assessment (ESA) of the commercial property located at 1010 Keller Drive in New Salisbury, Harrison County, Indiana (the “subject property”).

### 1.1 Scope

The scope of work for this assessment conforms to the standards and protocols set forth in the U.S. Environmental Protection Agency’s (EPA’s) *Standards and Practices for All Appropriate Inquires* (AAI) (40 CFR 312).

The purpose of the ESA was to identify conditions indicative of releases or threatened releases of hazardous substances or petroleum products in accordance with AAI standards. The ESA included an evaluation of the following:

- General physical setting characteristics of the subject property and immediate vicinity through a review of one or more referenced sources, including topographic and geologic maps, soils and hydrologic reports.
- Historical usage of the subject property, adjoining properties and surrounding area through a review of referenced sources such as land title records, fire insurance maps, city directories, aerial photographs, property tax files, prior environmental assessment reports, and interviews.
- Current land use and existing conditions of the subject property including observations and interviews regarding the use, treatment, storage, disposal or generation of hazardous substances, petroleum products and hazardous, regulated, or medical wastes; equipment that is known or likely to contain PCBs; storage tanks and drums; wells, drains and sumps; and pits, ponds or lagoons.
- Current land use of adjoining and surrounding area properties and the likelihood of known or suspected releases of hazardous substances or petroleum products to impact the subject property.
- Environmental regulatory database information and local environmental records within the appropriate AAI search radii from the subject property.

## **1.2 Terms and Conditions**

This Phase I ESA was performed on behalf of and solely for the exclusive use of Wyatt, Tarrant & Combs, LLP. No other company, entity, or person shall have any rights with regard to LFI's contract with Wyatt, Tarrant & Combs, LLP including but not limited to indemnification by LFI, or any rights of reliance on the findings, conclusions, and recommendations of this or any subsequent reports regarding the subject property.

## **1.3 Limitations and Exceptions**

LFI conducted the Phase I ESA using reasonable efforts to identify conditions indicative of releases or threatened releases of hazardous substances or petroleum products at the subject property. Findings within this report are based on information collected from observations made on the day of the site reconnaissance and from reasonably ascertainable information obtained from public agencies and other referenced sources. Recognized inherent limitations for ESAs that apply to this report include:

- *Uncertainty Not Eliminated* – No ESA can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a site.
- *Not Exhaustive* – An ESA is not an exhaustive environmental investigation.
- *Past Uses of the Property* – Review of standard historical sources at less than five year intervals is not required by AAI.

This report is not definitive and should not be assumed to be a complete or specific determination of all conditions above or below grade. Current subsurface conditions may differ from the conditions indicated by surface observations or historical sources and can be most reliably evaluated through intrusive techniques that were beyond the scope of this ESA. Information in this report is not intended for use as a construction document and should not be used for demolition, renovation, or other construction purposes. LFI makes no representation or warranty that the past or current operations at the site are, or have been, in compliance with applicable federal, state and local laws, regulations and codes.

Environmental Data Resources, Inc. (EDR), an independent environmental data research company, provided the records from the government agency databases referenced in this report.

Information regarding surrounding area properties was requested for the applicable minimum AAI search radii and was assumed to be correct and complete unless obviously contradicted by LFI's observations or other credible referenced sources reviewed during the ESA. LFI is not a professional title insurance or land surveyor firm and makes no guarantee, explicit or implied, that any land title records acquired or reviewed, or any physical descriptions or depictions of the site in this report, represent a comprehensive definition or precise delineation of property ownership or boundaries.

## **2.0 SITE DESCRIPTION**

The location, description, and current uses of the subject property, as well as surrounding properties are presented in the following sections.

### **2.1 Location and Description**

The subject property is located on Keller Drive, approximately one mile southwest of New Salisbury, Indiana. In general, the property is located in a rural area with limited residential development in north-central Harrison County, Indiana, on the south side of Highway 64, just west of Highway 135. The subject property is comprised of four adjoining parcels occupying a total area of approximately 47 acres. The property is developed commercially but was vacant at the time of the site reconnaissance.

A site location map is provided in **Figure 1**. A 2010 aerial photograph depicting the site and surrounding property use is provided in **Figure 2**. Photographs of the site are included in **Appendix A**.

#### **2.1.1 Structures / Improvements**

A two-story building occupying approximately 220,000 square feet is located at the subject property and was reportedly constructed by Keller Manufacturing Company, Inc. (Keller) in 1973. The building is of steel frame construction with concrete block walls on a concrete slab foundation. The two-story office section of the building was reportedly remodeled in 2003 and additions to the building were constructed in 2004. Outbuildings include a pump house, drying

kiln and a smoking area. The facility is serviced by an on-site sewage treatment system. The property was reportedly last used in 2009 and is currently vacant.

### **2.1.2 Roads**

The property is accessible by Keller Drive to the east where it connects with Corydon Junction Road. This road connects to Highway 135 further to the east. Highway 135 connects to Interstate I-64 approximately 4.5 miles to the south and to state road 64 approximately one mile to the north. The property is bordered by the Norfolk Southern rail line to the north and a railroad side line reportedly owned by Lucas Oil Company to the east.

### **2.1.3 Sewage Disposal**

All waste water generated at the plant is discharged into an on-site waste water treatment plant located in the west-central portion of the site. A description of the sewage treatment area is provided in Section 5.11.

### **2.1.4 Potable Water Source**

Potable drinking water is reportedly supplied to the property by the Ramsey Water Company. Water is stored on site in a lined reservoir with a reported capacity of 250,000 gallons. No obvious supply/monitoring wells or cisterns were observed or reported to be on-site; however public records did indicate the presence of a domestic use well at the subject property. A discussion of this feature is provided in Section 5.12.

## **2.2 Topography and Drainage**

A review of the *Crandall, IN* United States Geological Survey (USGS), 7.5-Minute Topographic Quadrangle (1994) indicates a surface elevation for the subject property ranging between 690 and 730 feet above the National Geodetic Vertical Datum (NGVD) of 1929 (approximately mean sea level). A copy of the topographic map is provided in **Figure 1**.

Major hydrogeologic features such as a river or lake generally influence regional groundwater flow direction. Surface and/or bedrock topography may also influence regional groundwater flow direction. A review of the topographic map indicates that karst topography may be present in the

general vicinity of the site, which is dominated by subsurface flow through caves or other solutional channels. Based on information gathered during the site visit, the topography of the land, and information contained in the EDR report, the direction of groundwater flow beneath the subject property is interpreted to be generally southeast with the local topographic gradient, in the direction of Indian Creek, approximately 0.5 mile from the subject property. The discharge location for local groundwater cannot be determined due to the karst topography. A site-specific hydrogeologic study would be necessary to determine actual groundwater flow direction.

### **2.3 Current Use of Property**

The manufacturing facility and offices at the subject property were vacant at the time of the site reconnaissance.

### **2.4 Current Use of Adjoining Properties**

Nearby property usage could potentially impact the surface and subsurface conditions of a site. Developing a history of past to present uses or occupancies can provide an indication of the likelihood of environmental concern. In general, the subject property is located in a rural area of Harrison County, north of the county seat of Corydon. An aerial photograph illustrating the surrounding property use relative to the subject property is included as **Figure 2**. A general description of surrounding land use is as follows:

#### North

The subject property is bordered to the north by a rail line with residential property beyond.

#### South

The subject property is bordered to the south by residential and undeveloped areas.

#### East

The subject property is bordered to the east by a rail line with a church, residential and undeveloped areas beyond.

#### West

The subject property is adjoined to the west by residential and undeveloped areas.

### 3.0 SITE HISTORY AND HISTORICAL RECORDS REVIEW

Historical information about the subject property, based on an evaluation of available records reviewed during the Phase I, is included in the following sections.

#### 3.1 Past Uses of Property

Initial development of the site began in 1973 with the construction of the light-industrial facility by Keller, a furniture manufacturer and distributor. Prior to 1973, the property was reportedly undeveloped and used for agricultural purposes. The property was purchased by Child Craft Industries, a subassembly and light finishing distributor of children's furniture in 2004. The property was transferred to G.E.G. of Indiana, Inc. (also known as Gateway Manufacturing) in 2008. The facility ceased operations in 2009.

#### 3.2 Past Uses of Adjoining Properties

Adjoining properties appear to have been primarily undeveloped or used for residential or agricultural purposes.

#### 3.3 Topographic Maps

Historical topographic maps provide information related to physical land configuration such as elevation, ground slope, surface water and other features. While most buildings in densely developed urban centers are not depicted, topographic maps typically show structures equal to or larger than the size of a single-family residence in rural areas. Other notable features such as woods, pipelines, municipal boundaries, and areas of filled land are often marked on topographic maps.

Historical topographic maps of the subject property and surrounding area were provided to LFI in an *EDR Historical Topographic Map Report* dated September 13, 2011. Topographic maps were provided for 1954, 1980 and 1994. The subject property is vacant in the 1954 map and shows as developed in the 1980 and 1994 maps. Surrounding areas are primarily undeveloped. A copy of the report is included as **Appendix B**. The review of available topographic maps did not identify obvious past uses indicating releases or threatened releases from surrounding properties.

### 3.4 Aerial Photographs

Aerial photographs are generally very small scale and only provide a general idea of activity in the area. Aerial photographs are instantaneous records and their usefulness is limited because they do not necessarily reflect the condition of a site before or after the photographs were taken.

A search for aerial photographs of the subject property and surrounding area was conducted by EDR and provided to LFI in an *Aerial Photo Report* dated September 14, 2011. Aerial photographs were provided for various years from 1960 to 2008. A copy of the EDR *Aerial Photo Report* is included as **Appendix C** and a summary is presented in the following table:

**Aerial Photographs**

Year	Issues Noted	Observations
1960	No	<p><b>Subject Property:</b> Undeveloped agricultural property.</p> <p><b>Surrounding Properties:</b> Residential and undeveloped, agricultural property.</p>
1978 1987 1992	No	<p><b>Subject Property:</b> The construction of the manufacturing facility is noted.</p> <p><b>Surrounding Properties:</b> Residential and undeveloped, agricultural property.</p>
1998	No	<p><b>Subject Property:</b> An expanded parking lot is noted, and equipment storage is noted on some of the gravel lots to the rear of the property.</p> <p><b>Surrounding Properties:</b> Residential and undeveloped, agricultural property.</p>
2005 2006 2007 2008	No	<p><b>Subject Property:</b> Addition to the plant can be noted. Soil disturbance can also be noted to the west of the northern section of the plant. No other major changes are noted over time.</p> <p><b>Surrounding Properties:</b> Increasing residential development is noted over time.</p>

The review of aerial photographs did not identify obvious past uses indicating releases or threatened releases from surrounding properties.

### 3.5 Sanborn Fire Insurance Maps

A search for Sanborn fire insurance maps for the subject property and surrounding area was conducted by EDR and provided to LFI in a *Certified Sanborn Map Report* dated September 12, 2011. No Sanborn Fire Insurance Maps were available for the site. A copy of the EDR *Certified Sanborn Map Report* is included as **Appendix D**.

### 3.6 City Directories

A search of historical city directories for the subject property and surrounding properties was conducted by EDR and provided to LFI in a *City Directory Report* dated September 15, 2011. Directories were reviewed for 2004 and 2010, indicating ownership by Keller Dedicated Trucking and Keller Mfg Co (furniture) in 2004 and by Child Craft LLC (furniture) in 2010. No surrounding properties were listed. City Directory listings for the subject property are provided in **Appendix E**.

### 3.7 Property Tax Files

According to information provided by the Harrison County Assessor's Office, ownership of the subject property is detailed in the following table:

**Property Tax Files**

<b>Date</b>	<b>Purchaser</b>	<b>Deed Book Information</b>
7/3/2008	G.E.G. of Indiana, LLC	N/A
12/6/1994	Child Craft Industries, Inc.	N/A
1/1/1900	The Keller Manufacturing	N/A

Keller Manufacturing reportedly purchased and developed the property in 1973 and was previously used for agricultural purposes. A copy of the property information is included in **Appendix F**.

## 4.0 ENVIRONMENTAL RECORDS REVIEWS

Files maintained by the U.S. EPA and Indiana Department of Environmental Management (IDEM) were reviewed to evaluate the regulatory history of the subject property and surrounding properties. A computerized database search conducted by EDR and dated September 13, 2011 was reviewed regarding solid and hazardous waste management, emergency response, chemical spills, and underground storage tanks, to determine, at a minimum, if the subject property or neighboring properties:

- have received notices of violation, cease and desist orders, memorandums of understanding, injunctions, etc.;
- are under investigation for violation of environmental laws, regulations or standards;
- are listed on environmental databases, including the Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS), Resource Conservation and Recovery Information System (RCRIS), UST notification lists, disposal sites, etc.; and,
- have been the subject of reported violations or complaints.

A copy of the EDR report that includes a detailed description of each of the databases and the results of the database inquiries is provided in **Appendix G**.

#### 4.1 Listings for Subject Site or Adjoining Properties

LFI reviewed the search results of standard environmental database sources that were provided for the subject property. The search of available federal, state and local regulatory agency databases was conducted in an attempt to (1) identify if the property is listed in any of the environmental databases and (2) identify facilities within the AAI defined search radius that could cause actual or potential environmental impacts to the subject property. The following standard database listings were identified in the EDR report:

#### Regulatory Database Search Summary

Regulatory Database	Minimum Search Distance	Property Listed?	# Sites Listed
Federal RCRA Generators	¼ Mile	Yes	1
State Spills	¼ Mile	Yes	1

\* Refer to **Appendix G** for detailed database results.

The fact that sites do or do not appear on a list does not necessarily indicate that an environmental concern exists. In addition, sites may not be mapped in a list search due to inaccuracy of owner/operator records, government records, or errors occurring during conversion of the data by informational sources.

The subject property was identified on the EDR environmental records search:

**1.) Child Craft Industries, Inc.**

**Address:** 1010 Keller Drive NE

**Databases:** AIRS; SPILLS

**Database Summary:**

This facility was issued a Title V air emissions permit in 1996. A minimal spill of paint was reported in 2004.

**2.) Keller Manufacturing Co. Inc.**

**Address:** 1010 Keller Drive

**Databases:** RCRA-SQG; FINDS; Manifest

**Database Summary:**

These database results are associated with the report of hazardous wastes generated between 1986 and 2008, including waste paint and solvent waste. Compliance inspections conducted in 1997 and 2002 resulted in a total of four 'Notices of Violations' for the facility, resulting in written informal corrective actions. These issues have been resolved and were discussed in a previous Phase I report by Haggerty Engineering in 2004. An electronic copy of this report is provided in **Appendix H.**

EDR's environmental records search did not identify the any adjoining properties on any of the search databases reviewed.

#### **4.2 Listings within Established Search Radii**

The EDR environmental records search did not map any other properties within a 0.5-mile radius of the facility established for this project, as required by AAI, with a potential for release and impact on the site

The EDR environmental records search also provides a list of "orphan" sites, which are properties that could not be mapped due to poor or inaccurate address information. EDR's records search listed 4 orphan sites; however, none of these unmapped sites appear to be in the vicinity of the subject property based on our area reconnaissance.

## **5.0 SITE RECONNAISSANCE**

The findings of the site reconnaissance are presented in the following sections.

### **5.1 Site Reconnaissance Methodologies**

A site visit was performed on September 13, 2011 by Mr. Brendan Merk, Senior Hydrogeologist with LFI. Mr. Merk interviewed Mr. Ed Bell, the caretaker for the property who had worked for companies at the subject property for the past 25 years. Mr. Bell provided information regarding current and historical activities at the site. The purpose of the reconnaissance was to gather information regarding the environmental conditions at the subject property and surrounding areas. The site reconnaissance included a walk-over of the subject property and a brief evaluation of adjacent and nearby properties. Photographs taken during the site reconnaissance, depicting general site conditions at the time of the visit, are provided in **Appendix A**.

### **5.2 Site Reconnaissance Observations**

The subject property is located on Keller Drive and consists of a manufacturing facility in a primarily rural area in north-central Harrison County, Indiana. The subject property is comprised of four adjoining parcels, occupying a total area of approximately 47 acres. The property is currently unoccupied.

The two-story building at the property encompasses approximately 220,000 square feet and was used from at least 1973 through 2009 as a furniture manufacturing/finishing facility. The building includes a two-story office area, warehouse, manufacturing areas, a boiler (wood-fired) room, and maintenance area. Outbuildings included a sawdust drying kiln and pump house. A private access road joins the gravel parking areas east of the building to exterior storage areas to the south and loading docks on the west side of the building. A sewer treatment area is located in the west-central portion of the subject property. Former lift stations were noted in the southern portion of the facility, based on variations in the concrete floor. The lifts were reported to be either foot-pedal or electronically operated.

### 5.3 Hazardous Substances and Petroleum Products

The former manufacturing operations utilized lacquer-based paints and solvents for manufacturing and miscellaneous petroleum products for maintenance. At the time of the site visit, hazardous substances and/or petroleum products were observed as follows:

**Chemical and Petroleum Inventory**

Location	Chemical	Container size	Quantity
Boiler room	Misc. retail petroleum products	Up to 1 gallon	~2 dozen
	Compressor Fluid	5 gallon buckets	4
	Used vehicle battery	N/A	1
	Sodium Hydroxide	55 gallon plastic drums	2
Maintenance area	Motor oil	55 gallon drum	1
	Misc. retail petroleum products	5 gallon buckets	10
	Motor oil	Gallon containers	~1 dozen
	Propane canister for forklift	30#	1
	Roof cement	5 gallon buckets	5
	Used oil	Drums/buckets	<5 gallons
Pump house	Diesel fuel in above ground tank	200 gallons	1
Warehouse (various locations)	Used vehicle battery	N/A	1
	Paint cans	1 to 5 gallon	6
	Oil	5 gallon bucket	1
	Misc. retail petroleum products	Up to 1 gallon	~6

### 5.4 Solid and Hazardous Waste Management

A concrete pad previously used for chemical storage was noted on the exterior of the west side of the building. According to a previous Phase I ESA by LFI, numerous drums of liquid chemical and waste materials were stored there. The pad drained to an outfall location in a ditch that drains parallel to the building to the north. A sample collected from this area during a Limited Phase II investigation in 2008 indicated that the chemical constituents sampled were not detected.

Two dumpsters were noted during the site reconnaissance. A solid waste dumpster was noted in a loading dock near the southwest corner of the building and was reportedly used to contain waste generated from the cleanup of the closed plant. A second, plastic lined dumpster was noted south of the main building and east of the drying kiln. The dumpster contained residual boiler ash and waste from the wood-fired boiler at the plant.

Areas of scrap metal, sawdust, construction debris materials and discarded tires were observed in limited quantities at various locations across the site.

### **5.5 Underground Storage Tanks (USTs)**

Information obtained during the site reconnaissance, discussions with on-site personnel, and a review of regulatory search information did not indicate the current presence of USTs at the site. The visual site reconnaissance included a search for the following physical features commonly associated with the presence of one or more USTs:

- Fill ports,
- Slumped pavement or ground surface,
- Patched pavement,
- Evidence of underground piping or pump stations.

Although none of these features were discovered on the subject property, the absence of physical features cannot completely rule out the current or historical existence of one or more USTs. Site characteristics such as overgrown vegetation, new pavement, or past renovation/construction may prevent the identification of a UST.

Previous Phase I ESA reports indicated a former 10,000-gallon fuel oil tank was previously used to power the on-site boiler system. The non-regulated UST system was removed, and soil samples collected during a Limited Phase II investigation in 2004 indicated no diesel fuel constituents above laboratory detection levels.

### **5.6 Aboveground Storage Tanks (ASTs)**

Aboveground storage tanks (ASTs) are considered to be potential sources of surface and subsurface contamination due to surface spills and other releases which may result from improper usage and filling procedures.

As noted in Section 5.3, one (1) AST was noted in the pump house located southeast of the main building. The approximately 200-gallon capacity tank is used for emergency power backup for the building sprinkler system. No obvious evidence of a release from the AST was observed.

### **5.7 Polychlorinated Biphenyls (PCBs)**

Polychlorinated biphenyls (PCBs) are organic compounds that have been used extensively in electrical capacitors and transformers, lighting ballasts, hydraulic fluids, heat exchange fluids, lubricants, inks, sealants, adhesives and surface coatings since development in 1929. PCB production was banned in the U.S. in 1979 due to health and environmental hazards. Under the Toxic Substances Control Act (TSCA), as outlined in Title 40 of the Code of Federal Regulations (CFR) Part C, 761, the owners of PCB containing equipment are responsible for environmental impairment and liabilities caused by leakage of PCBs to the environment.

One pad-mounted transformer was observed on the site. The transformer is reportedly owned and operated by Harrison County REMC and was marked as 'Non-PCB' containing.

### **5.8 Pits, Ponds, and Lagoons**

No obvious pits or lagoons were observed on the exterior of the site. In addition to the lined reservoir adjacent to the pump house, a sewage pond is located on the west-central portion of the subject property. The pond is typically used to contain treated sewage water but was dry at the time of the site reconnaissance.

### **5.9 Drains and Sumps**

Floor drains were noted throughout the building, both in the office and manufacturing areas. No obvious staining was noted around the floor drains, which reportedly drain to the on-site sewage treatment area.

### **5.10 Septic Systems**

No septic systems were reported or observed to be at the site.

### **5.11 Waste Water Management**

All waste water generated at the facility is treated by an on-site water treatment plant located in the west-central portion of the site. The subject property has an active permit (INR220099) through IDEM and submits usage reports on a monthly basis. Previous sampling results indicated no evidence of environmental impact associated with the treatment area, according to previous

monthly sampling reports submitted to IDEM. Copies of the IDEM open records documentation is included in **Appendix H**.

### **5.12 Wells**

The site is reportedly serviced by the Ramsey Water Company, Inc. The *EDR Radius Map Report* reported the presence of a water well at the site based on public records. No evidence of the well was otherwise noted or reported at the site. Records indicate that the well was installed in 1967 to a depth of 81 feet below ground surface with a static water level of 54 feet below ground surface.

### **5.13 Stained Soil/Pavement**

No obvious stained soil or pavement was observed at the site. Former areas of stained soils are discussed in previous Phase I/II ESA reports. Electronic copies of the previous reports are included in **Appendix H**.

### **5.14 Stressed Vegetation**

No obvious areas of stressed vegetation were observed on the site.

### **5.15 Odors**

No obvious unusual odors were noticed at the site.

### **5.16 Asbestos Containing Materials (ACM)**

Asbestos is a general term for a group of fibrous minerals (primarily chrysotile, amosite and crocidolite) that have long been used as fireproof insulation and as a strengthener in pipe insulation, roofing tiles, floor tiles, wall coverings and other materials. Undisturbed asbestos-containing material (ACM) is not dangerous. But when ACM is broken or torn, as during remodeling or demolition, the fibers can be spread into the air, especially if the material is friable (crumbly). Due to health hazards, ACM use has been phased out since approximately 1978.

An asbestos survey was not requested as part of our scope of work for this project; however, based on the construction date of buildings at the site (1973), the presence of asbestos-containing

building materials cannot be ruled out. The exception to this may be the office area of the building which was reportedly remodeled in 2003. An asbestos inspection is recommended prior to any remodeling or demolition activities at the subject property.

### **5.17 Vapor Intrusion**

Chemical vapors resulting from subsurface contamination can penetrate building foundations at levels that potentially raise health concerns for occupants.

No obvious indications of subsurface contamination were observed during our assessment; therefore, a vapor intrusion condition at the site buildings is unlikely.

### **5.18 Other Environmental Concerns**

LFI personnel had previously completed assessment activities at the site, as reported in our *Phase I/Limited Phase II Environmental Site Assessment* for the subject property, dated April 11, 2008. Information collected in the course of this previous assessment identified areas of concern at the site. Soil samples for laboratory analysis were collected from the discharge location of the chemical storage area and below a dumpster containing spent paint filters. The samples did not indicate chemical constituents above laboratory detection limits. The report did not recommend any additional sampling.

Contained within the LFI report was a previous *Phase I Environmental Site Assessment* report dated August 31, 2004 and a *Phase II Limited Sampling and Testing* report dated September 17, 2004 by Haggerty Engineering, Inc. The reports identified a former staging area for hazardous materials and wastes, a dumpster of discarded paint filters with soil staining underneath, a former UST used to power the boiler, possible migration of chemicals from the paint mixing area, and suspect buried ash from the boiler, which had been noted to have burned used paint filters and coal in addition to wood materials. Samples collected in these areas indicated chemical concentrations below IDEM industrial closure levels.

A *Supplemental Information* letter dated June 18, 2008 was completed by LFI and documented the disposal of waste sawdust and tire debris left at the subject property by Keller. Tires left at

the site were properly disposed and the sawdust was emplaced in an excavated area near the former stockpile area.

Electronic copies of the previous Phase I/II reports are included in **Appendix H**.

## **6.0 INTERVIEWS**

The following interviews were conducted during the assessment in an effort to obtain information indicating potential environmental conditions in connection with the subject property.

### **6.1 Current Property Owner**

An interview with Mr. Ed Bell, a caretaker of the property who has been with the property for 25 years, was completed during the site reconnaissance on September 13, 2011. Mr. Bell provided information on the history and previous uses of the plant and was not aware of any environmental concerns associated with the property.

### **6.2 Local Government Officials**

As noted in Section 4.2, the Indiana Virtual File Cabinet (VFC) was searched for information regarding the subject property. Records were identified for air permitting, sewage treatment operations and hazardous waste disposal. Information for 2008 and prior years is summarized in previous Phase I investigations conducted at the subject property and is included in electronic format in **Appendix H**. Available information not previously documented is limited as the facility ceased operations in June 2009. Copies of available documentation consists of a 2008 annual hazardous waste report, monthly sewage treatment logs indicating that no sewage was treated through the on-site system (as the facility was not operating), and air permit information. These documents are also included in **Appendix H**.

A request for information on the subject property was made to the Harrison County Health Department Environmental Section. The department indicated that they did not have any files on the facility, but recommended checking the files at IDEM.

## **7.0 USER PROVIDED INFORMATION**

In accordance with the AAI standards, the user of this ESA, Wyatt, Tarrant & Combs, LLP, may obtain information through other due diligence activities associated with the pending property transaction that could help identify the possibility of potential environmental conditions in connection with the subject property. Information provided by the user regarding the site includes the following:

### **7.1 Environmental Liens or Activity and Use Limitations**

No additional information regarding environmental liens or activity and use limitations was provided to LFI.

### **7.2 Common/Specialized Knowledge or Experience**

LFI had previously completed assessment activities at the site as reported in our *Phase I/Limited Phase II Environmental Site Assessment* for the subject property, dated April 11, 2008. A discussion of these reports is provided in Section 5.18.

No other common or specialized knowledge or experience was applicable to this site.

### **7.3 Reasons for Significantly Lower Purchase Price**

Information regarding lower purchase price was provided to LFI via an email that indicated that the property had sold at auction.

## **8.0 DATA GAPS**

Four (4) data gaps in excess of five-year intervals (post-1940) were identified while creating this report that could prevent the identification of environmental conditions, including a lack of historical information at the site:

- 1940 to 1954: In the 1954 topographic map the subject property is depicted as vacant and undeveloped.
- 1954 to 1960: The 1960 aerial photographs depict the subject property as vacant and undeveloped.

- 1960 to 1968: A previous Phase I ESA report describes the subject property as vacant and undeveloped in 1968.
- 1980 to 1987: The subject property was operational as the Keller plant during this time.

It is the opinion of LFI that these data gaps, relative to the lack of historical records, do not preclude rendering a professional opinion regarding potential releases or threatened releases at the subject property.

## **9.0 SUMMARY AND RECOMMENDATIONS**

The following summarizes known or suspected environmental conditions in connection with the property based on information collected during the assessment. For each condition, LFI provides an opinion of the impact on the site based on an evaluation of the results of records reviews, site reconnaissance and interviews performed as part of this assessment. LFI also provides a recommendation and rationale regarding whether or not an environmental condition represents a release or threatened release, as summarized below:

- The subject property is located on Keller Drive, approximately one mile southwest of New Salisbury, Indiana. In general, the property is located in a rural area with limited residential development in north-central Harrison County, Indiana, on the south side of Highway 64, just west of Highway 135. The subject property is comprised of four adjoining parcels occupying a total area of approximately 47 acres.
- A two-story building occupying approximately 220,000 square feet is located at the subject property and was reportedly constructed by Keller Manufacturing Company, Inc. (Keller) in 1973. The building is of steel frame construction with concrete block walls on a concrete slab foundation. The two-story office section of the building was reportedly remodeled in 2003 and additions to the building were constructed in 2004. Outbuildings include a pump house, drying kiln and a smoking area. The facility is serviced by an on-site sewage treatment system. The property was reportedly last used in 2009 and is currently vacant.
- A review of the topographic map indicates that karst topography may be present in the general vicinity of the site, which is dominated by subsurface flow through caves or other solutional channels. The discharge location for local groundwater cannot be determined due to the karst topography.
- EDR's radius report identified the facility on available public databases. The facility was issued a Title V air emissions permit in 1996. A minimal spill of paint

was reported in 2004. Hazardous waste was generated between 1986 and 2008, including waste paint and solvent waste. Compliance inspections conducted in 1997 and 2002 resulted in a total of four 'Notices of Violations' for the facility, resulting in written informal corrective actions. These issues have been resolved and were discussed in a previous Phase I report by Haggerty Engineering in 2004. An electronic copy of this report is provided in **Appendix H**.

- A concrete pad previously used for chemical storage was noted on the exterior of the west side of the building. According to a previous Phase I ESA by LFI, numerous drums of liquid chemical and waste materials were stored there. The pad drained to an outfall location in a ditch that drains parallel to the building to the north. A sample collected from this area during a Limited Phase II investigation in 2008 indicated that the chemical constituents sampled were not detected.
- Previous Phase I ESA reports indicated a former 10,000-gallon fuel oil tank was previously used to power the on-site boiler system. The non-regulated UST system was removed, and soil samples collected during a Limited Phase II investigation in 2004 indicated no diesel fuel constituents above laboratory detection levels.
- One (1) AST was noted in the pump house located southeast of the main building. The approximately 200-gallon capacity tank is used for emergency power backup for the building sprinkler system. No obvious evidence of a release from the AST was noted.
- All waste water generated at the facility is treated by an on-site water treatment plant located in the west-central portion of the site. The subject property has an active permit (INR220099) through IDEM and submits usage reports on a monthly basis. Previous sampling results indicated no evidence of environmental impact associated with the treatment area.
- An asbestos survey was not requested as part of our scope of work for this project; however, based on the construction date of buildings at the site (1973), the presence of asbestos-containing building materials cannot be ruled out. The exception to this may be the office area of the building which was reportedly remodeled in 2003. An asbestos inspection is recommended prior to any remodeling or demolition activities at the subject property.

### ***Conclusion & Recommendations***

Based on evaluation of available environmental information relative to the subject site and our site reconnaissance, we did not identify obvious environmental concerns at the subject property. Therefore, we do not recommend additional assessment at this time.

## 10.0 REFERENCES

- Environmental Data Resources, Inc. *The EDR Radius Map, G.E.G. of Indiana Property, 1010 Keller Drive, New Salisbury, IN 47161, Inquiry Number: 3164714.2s*, September 13, 2011.
- Environmental Data Resources, Inc. *EDR Historical Topographic Map Report, G.E.G. of Indiana Property, 1010 Keller Drive, New Salisbury, IN 47161, Inquiry Number: 3164714.4*, September 13, 2011.
- Environmental Data Resources, Inc. *Certified Sanborn Map Report, G.E.G. of Indiana Property, 1010 Keller Drive, New Salisbury, IN 47161, Inquiry Number: 3164714.3*, September 12, 2011.
- Environmental Data Resources, Inc. *EDR Aerial Photo Decade Package, G.E.G. of Indiana Property, 1010 Keller Drive, New Salisbury, IN 47161, Inquiry Number: 3164714.5*, September 14, 2011.
- Environmental Data Resources, Inc. *EDR City Directory Abstract, G.E.G. of Indiana Property, 1010 Keller Drive, New Salisbury, IN 47161, Inquiry Number: 3164714.6*, September 15, 2011.
- Haggerty Engineering, Inc. *Phase I Environmental Site Assessment*, August 31, 2004.
- Haggerty Engineering, Inc. *Phase II Limited Sampling and Testing*, September 17, 2004.
- Linebach Funkhouser, Inc. *Phase I/Limited Phase II Environmental Site Assessment Report*, April 11, 2008.
- Linebach Funkhouser, Inc. *Phase I/Limited Phase II Environmental Site Assessment Report, Supplemental Information*, June 18, 2008.

## 11.0 CERTIFICATION OF ENVIRONMENTAL PROFESSIONAL

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in §312.10 of this part.

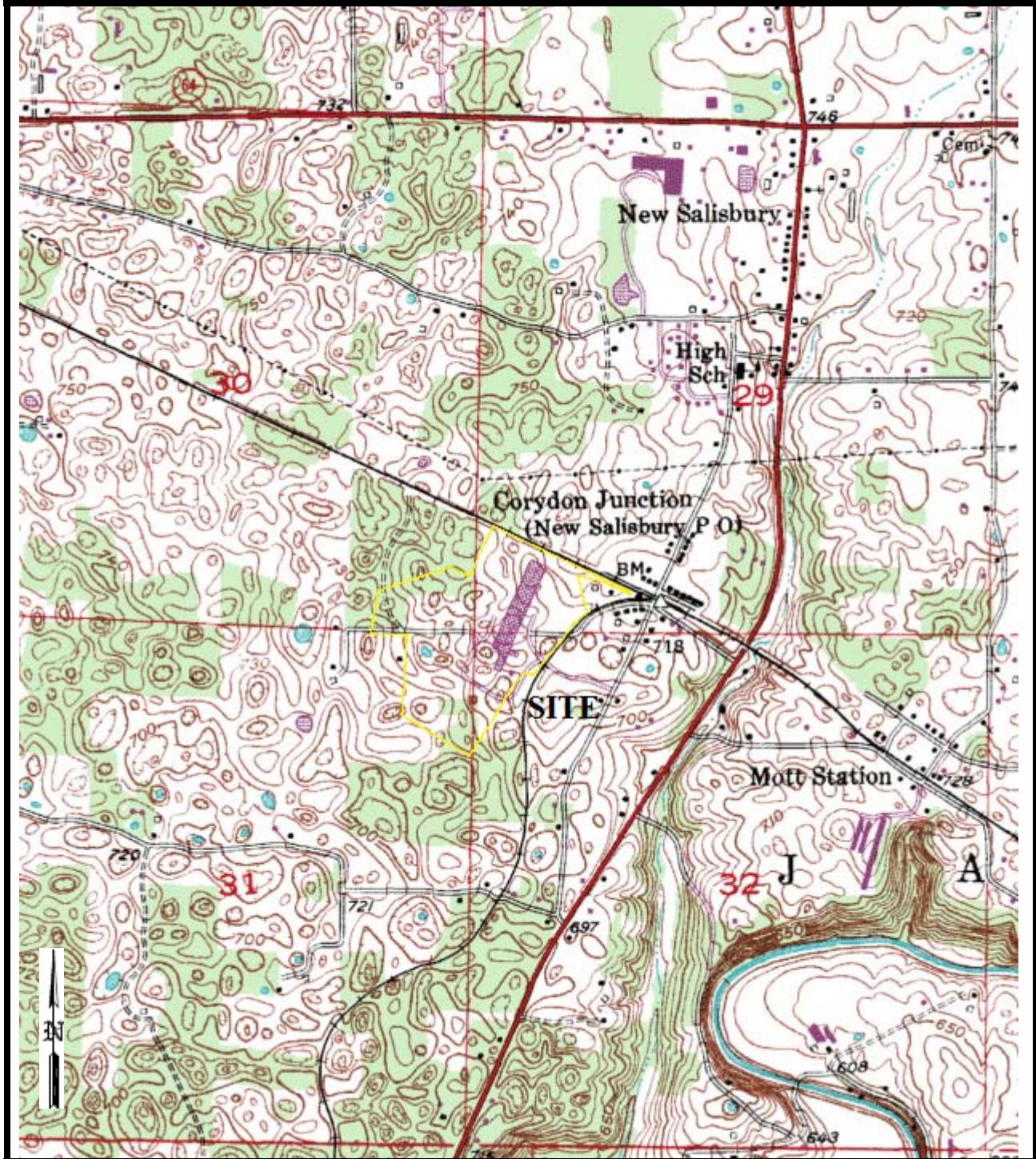
Brendan P. Mueh

Environmental Professional

9/19/11

Date

# Figures



G.E.G. of Indiana Property  
 1010 Keller Drive  
 New Salisbury, Indiana

**PROJECT NO: 196-11**



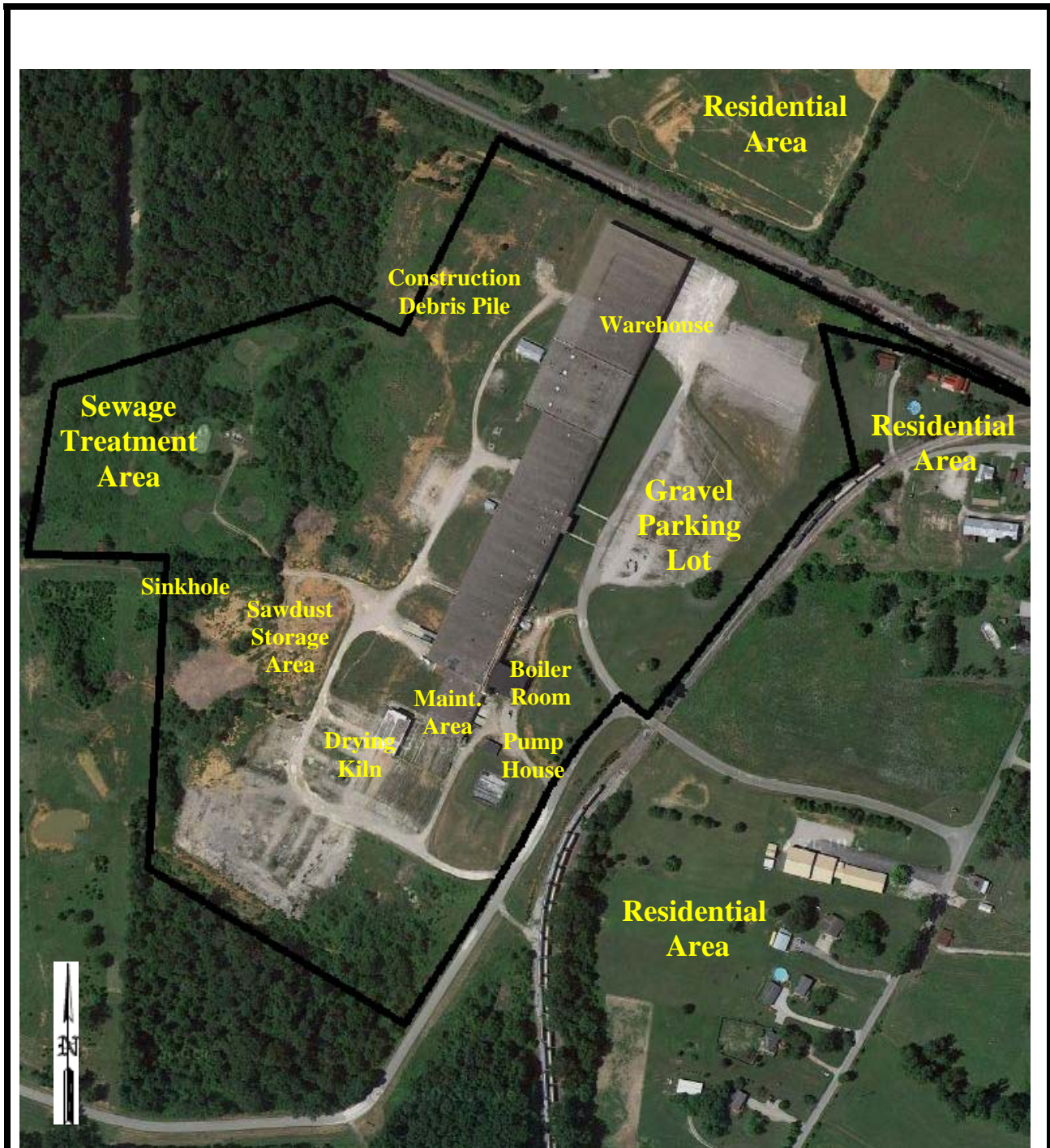
**Linebach Funkhouser, Inc.**  
*environmental compliance & consulting*

**Site Location Map**

USGS Topographical Map  
 1994 Crandall, IN

Scale:  
 1:24,000

Figure:  
 1



G.E.G. of Indiana Property  
 1010 Keller Drive  
 New Salisbury, Indiana

**PROJECT NO: 196-11**



**Linebach Funkhouser, Inc.**  
*environmental compliance & consulting*

2010 Aerial Photograph  
 Showing Surrounding  
 Property Use

Scale:  
 1:6,000

Figure:  
 2

**Appendix A**

**Site Photographs**



## Photographic Record

**Client:** Wyatt, Tarrant & Combs, LLP

**Site Name:** G.E.G. of Indiana Property

**Project Number:** 196-11

**Site Location:** 1010 Keller Drive, New Salisbury, Indiana

**Photo Number:**

1

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Northwest

**Comments:**

A view of the subject property from Corydon Junction Road and along Keller Drive.



**Photo Number:**

2

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

West

**Comments:**

The facility comprises over 200,000 square feet. The building was constructed in 1973 and expanded in 2005. The plant has been vacant since 2009.





## Photographic Record

**Client:** Wyatt, Tarrant & Combs, LLP

**Site Name:** G.E.G. of Indiana Property

**Project Number:** 196-11

**Site Location:** 1010 Keller Drive, New Salisbury, Indiana

**Photo Number:**

3

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Interior

**Comments:**

The two-story office area was reportedly remodeled in 2005.



**Photo Number:**

4

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Interior

**Comments:**

Some water infiltration and mold growth was noted on the second floor of the office area.





### Photographic Record

**Client:** Wyatt, Tarrant & Combs, LLP

**Site Name:** G.E.G. of Indiana Property

**Project Number:** 196-11

**Site Location:** 1010 Keller Drive, New Salisbury, Indiana

**Photo Number:**

5

**Photographer:**

Brendan Merk

**Date:**

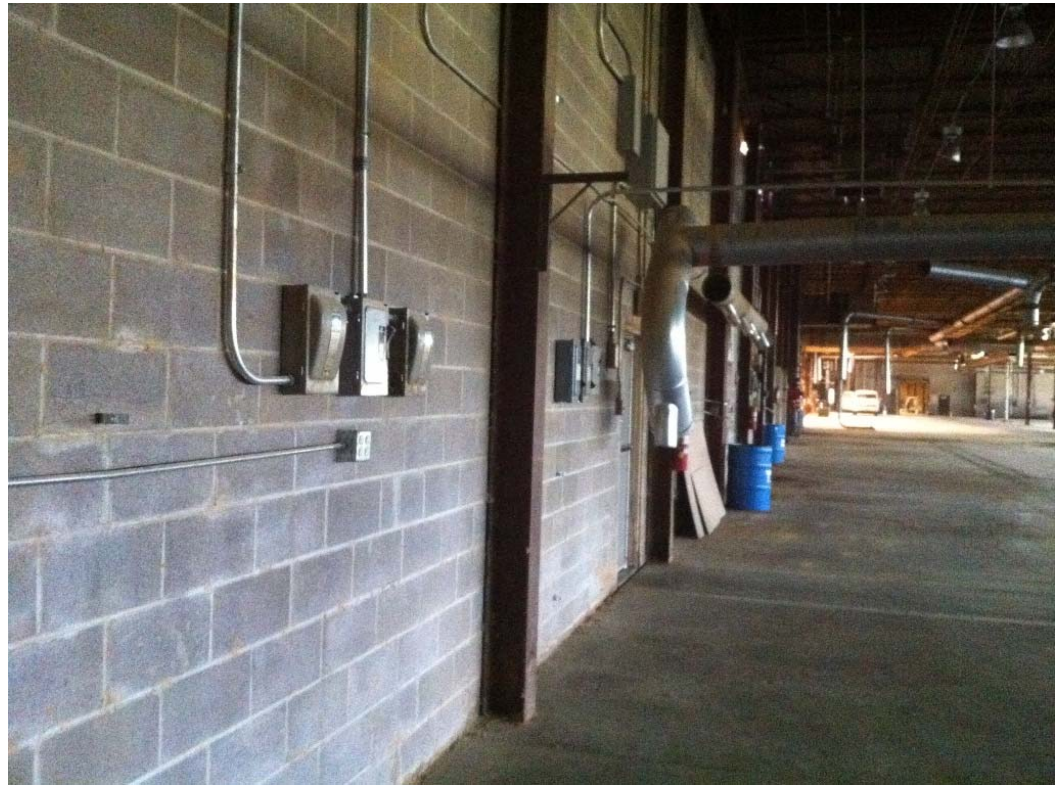
September 13, 2011

**Direction:**

Interior

**Comments:**

The building is of steel frame and concrete block construction on a concrete slab floor.



**Photo Number:**

6

**Photographer:**

Brendan Merk

**Date:**

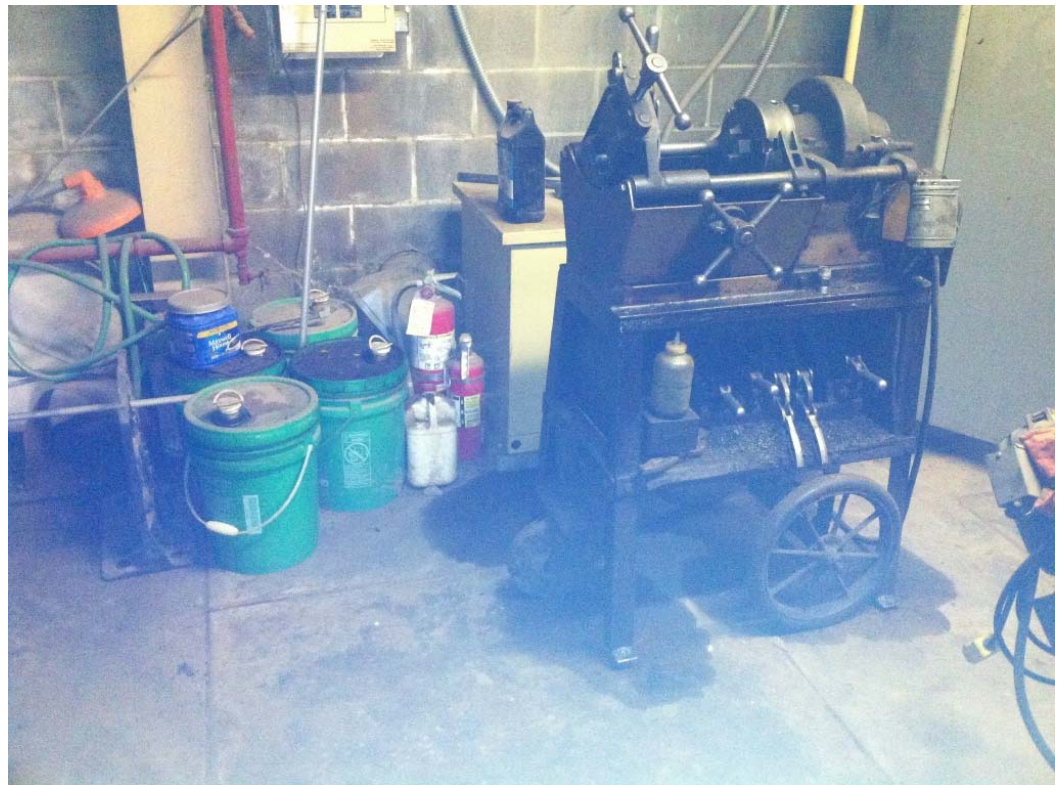
September 13, 2011

**Direction:**

Interior

**Comments:**

A view of some of the chemical products stored in the boiler room of the inactive plant.





### Photographic Record

**Client:** Wyatt, Tarrant & Combs, LLP

**Site Name:** G.E.G. of Indiana Property

**Project Number:** 196-11

**Site Location:** 1010 Keller Drive, New Salisbury, Indiana

**Photo Number:**

7

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Interior

**Comments:**

The pump house is connected to a lined reservoir and has an electrical failure emergency backup. The diesel above-ground storage tank ensures that the plant sprinkler system will remain operational at all times.



**Photo Number:**

8

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

North

**Comments:**

A view of the pump house, sawdust silo and boiler room, all near the southern end of the plant.





### Photographic Record

**Client:** Wyatt, Tarrant & Combs, LLP

**Site Name:** G.E.G. of Indiana Property

**Project Number:** 196-11

**Site Location:** 1010 Keller Drive, New Salisbury, Indiana

**Photo Number:**

9

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Interior

**Comments:**

Storage of new and used motor oil in the maintenance area of the plant.



**Photo Number:**

10

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

East

**Comments:**

A view of the onsite sewage treatment works in the west-central portion of the subject property.





### Photographic Record

**Client:** Wyatt, Tarrant & Combs, LLP

**Site Name:** G.E.G. of Indiana Property

**Project Number:** 196-11

**Site Location:** 1010 Keller Drive, New Salisbury, Indiana

**Photo Number:**

11

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Southwest

**Comments:**

A former sawdust storage area. The sawdust pile was reportedly left by Keller and later addressed by Child Craft.



**Photo Number:**

12

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

West

**Comments:**

The sawdust was reportedly buried in the area behind the scrap metal pile.





## Photographic Record

**Client:** Wyatt, Tarrant & Combs, LLP

**Site Name:** G.E.G. of Indiana Property

**Project Number:** 196-11

**Site Location:** 1010 Keller Drive, New Salisbury, Indiana

**Photo Number:**

13

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Northwest

**Comments:**

A former chemical storage area was the subject of a 2008 Phase II investigation. No environmental issues were noted with the former storage area.



**Photo Number:**

14

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Southwest

**Comments:**

Concrete pads mark previous areas where above-ground storage tanks were previously staged.





### Photographic Record

**Client:** Wyatt, Tarrant & Combs, LLP

**Site Name:** G.E.G. of Indiana Property

**Project Number:** 196-11

**Site Location:** 1010 Keller Drive, New Salisbury, Indiana

**Photo Number:**

15

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Interior

**Comments:**

Floor drains in the facility are reportedly connected to the on-site sewage treatment system. No staining was observed and previous analytical data from the sewage treatment operations did not indicate the potential release of chemical constituents.



**Photo Number:**

16

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Interior

**Comments:**

A former lift station was noted in the southern portion of the facility and was reportedly electrically operated.





### Photographic Record

**Client:** Wyatt, Tarrant & Combs, LLP  
**Project Number:** 196-11

**Site Name:** G.E.G. of Indiana Property  
**Site Location:** 1010 Keller Drive, New Salisbury, Indiana

**Photo Number:**  
17

**Photographer:**  
Brendan Merk

**Date:**  
September 13, 2011

**Direction:**  
West

**Comments:**  
Minor waste disposal was noted in a large sinkhole to the west of the former sawdust stockpile.



**Photo Number:**  
18

**Photographer:**  
Brendan Merk

**Date:**  
September 13, 2011

**Direction:**  
Aerial

**Comments:**  
A construction debris pile on the west side of the plant (northeast of the sewage area) was reportedly generated from the expansion of the plant in 2005.





### Photographic Record

**Client:** Wyatt, Tarrant & Combs, LLP

**Site Name:** G.E.G. of Indiana Property

**Project Number:** 196-11

**Site Location:** 1010 Keller Drive, New Salisbury, Indiana

**Photo Number:**

19

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Northeast

**Comments:**

A burn pile area was noted on the southwest portion of the property.



**Photo Number:**

20

**Photographer:**

Brendan Merk

**Date:**

September 13, 2011

**Direction:**

Aerial

**Comments:**

Some limited solid waste was noted at various places around the property, including this waste tire in the southeast section of the subject property.



**Appendix B**

**EDR Historical Topographic Map Report**



**G.E.G. of Indiana Property**

1010 Keller Drive

New Salisbury, IN 47161

Inquiry Number: 3164714.4

September 13, 2011

# EDR Historical Topographic Map Report

# EDR Historical Topographic Map Report

Environmental Data Resources, Inc.s (EDR) Historical Topographic Map Report is designed to assist professionals in evaluating potential liability on a target property resulting from past activities. EDRs Historical Topographic Map Report includes a search of a collection of public and private color historical topographic maps, dating back to the early 1900s.

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

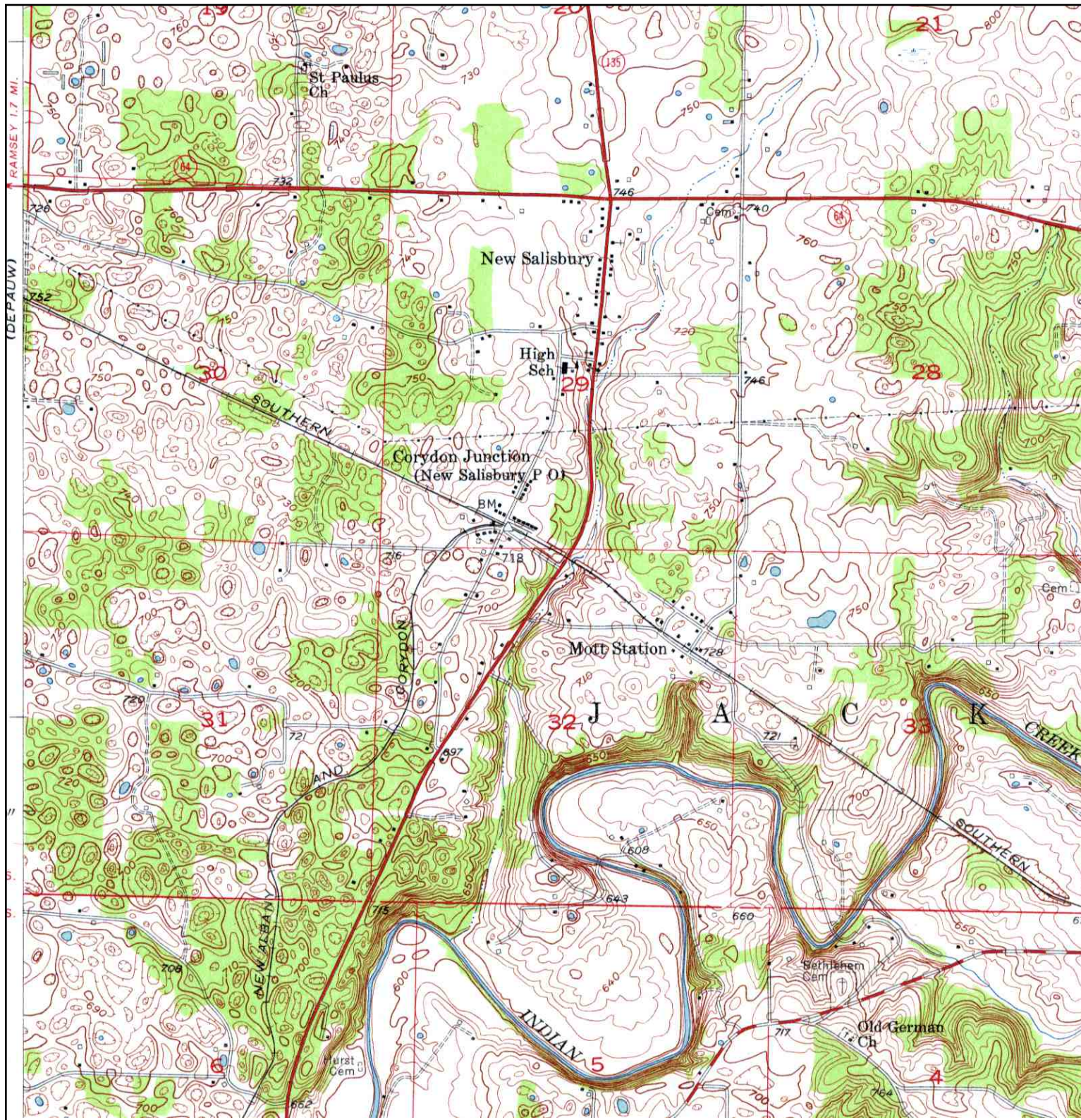
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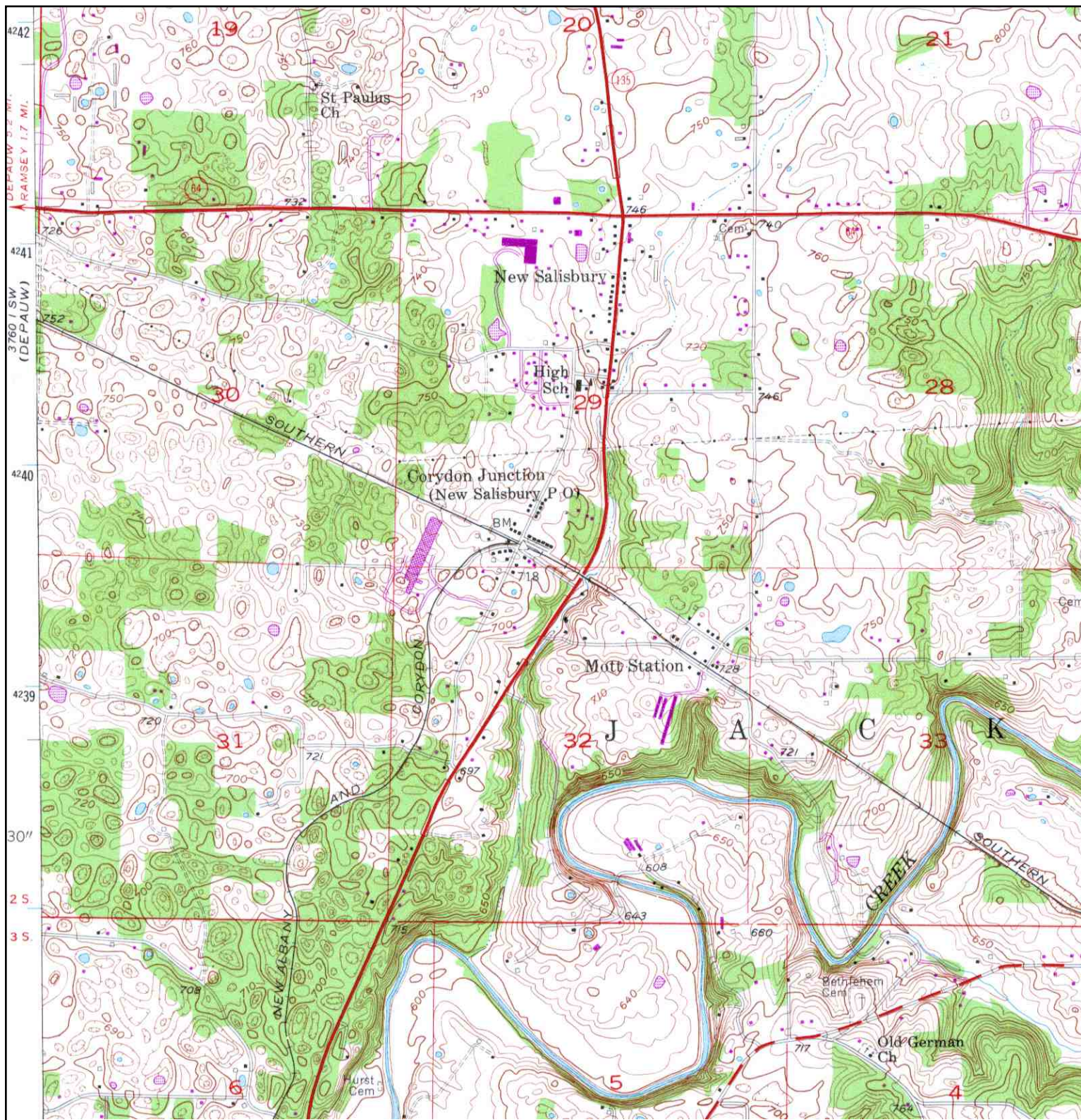
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# Historical Topographic Map



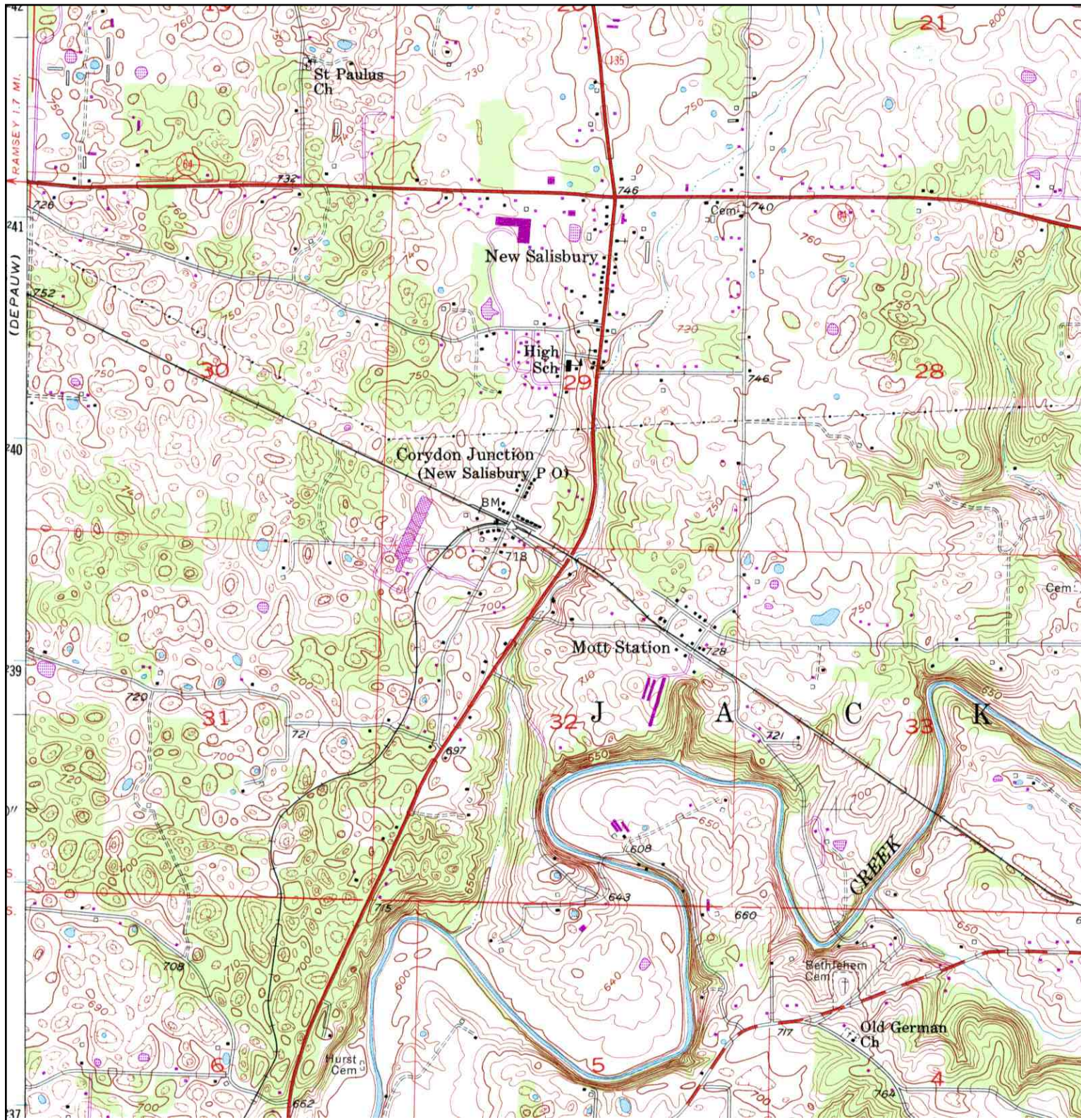
	<b>TARGET QUAD</b>	<b>SITE NAME:</b> G.E.G. of Indiana Property	<b>CLIENT:</b> Linebach Funkhouser Inc.	
	<b>NAME:</b> CRANDALL	<b>ADDRESS:</b> 1010 Keller Drive	<b>CONTACT:</b> Brendan Merk	
	<b>MAP YEAR:</b> 1954	<b>LAT/LONG:</b> 38.3017 / -86.1054	<b>INQUIRY#:</b> 3164714.4	<b>RESEARCH DATE:</b> 09/13/2011
	<b>SERIES:</b> 7.5			
	<b>SCALE:</b> 1:24000			


# Historical Topographic Map



	<b>TARGET QUAD</b>	<b>SITE NAME:</b> G.E.G. of Indiana Property	<b>CLIENT:</b> Linebach Funkhouser Inc.
	<b>NAME:</b> CRANDALL	<b>ADDRESS:</b> 1010 Keller Drive	<b>CONTACT:</b> Brendan Merk
	<b>MAP YEAR:</b> 1980	<b>NEW SALISBURY</b>	<b>INQUIRY#:</b> 3164714.4
	<b>PHOTOREVISED:</b> 1954	<b>LAT/LONG:</b> 38.3017 / -86.1054	<b>RESEARCH DATE:</b> 09/13/2011
	<b>SERIES:</b> 7.5		
	<b>SCALE:</b> 1:24000		

# Historical Topographic Map



<p>N</p> 	<b>TARGET QUAD</b>	<b>SITE NAME:</b> G.E.G. of Indiana Property	<b>CLIENT:</b> Linebach Funkhouser Inc.
	<b>NAME:</b> CRANDALL	<b>ADDRESS:</b> 1010 Keller Drive	<b>CONTACT:</b> Brendan Merk
	<b>MAP YEAR:</b> 1994	<b>NEW SALISBURY, IN 47161</b>	<b>INQUIRY#:</b> 3164714.4
	<b>REVISED:</b> 1954	<b>LAT/LONG:</b> 38.3017 / -86.1054	<b>RESEARCH DATE:</b> 09/13/2011
	<b>SERIES:</b> 7.5		
	<b>SCALE:</b> 1:24000		