



November 14, 1988

Mr. W. A. Elliott
Valley Realty
918 East Jefferson
South Bend, IN 46617

Dear Mr. Elliott:

On November 3, 1988, EIS Environmental Engineers, Inc. (EIS) conducted a "walk-through" environmental inspection of the Torrington Company property located at 3702 West Sample Street in South Bend, Indiana. This inspection was conducted at the request of Valley Realty in order to identify obvious areas of potential or actual concern from an environmental perspective.

The Torrington Company heavy bearings facility at South Bend consists of a site with approximately 15 acres and over 350,000 square feet of enclosed manufacturing space. The buildings reportedly date back as far as the late 1800's/early 1900's. The size and complexity of the property and the limited amount of time available for the inspection dictated that only obvious and significant areas of environmental concern would be addressed.

Valley Realty provided EIS with a copy of a Torrington Company report dated December 22, 1986 which describes certain actions taken to address environmental concerns at the Torrington facility after the 1984 decision to sell the property. This report refers to:

- o Sampling and analysis of the groundwater, drainage ponds and soil
- o Closure of drainage ponds #2, #3, #4 and #5
- o Removal of five underground storage tanks
- o Excavation and disposal of approximately 1,700 cubic yards of contaminated soil related to the underground tanks

The environmental inspection performed by EIS indicated several areas of environmental concern at the Torrington property. The most significant areas of concern are discussed below:

1. Previous Actions Taken With Respect to the Underground Tanks and Drainage Ponds

Mr. Reggie Baker of the Indiana Department of Environmental Management (IDEM) indicated to EIS that the IDEM was not formally involved in the actions described in the 12-22-86 Torrington Company report and had not inspected the Torrington property prior to, during or upon completion of the clean-up actions.

A new owner of the property could be held liable for additional clean-up costs should any remaining contamination from the underground tanks and drainage ponds be discovered. The 12-22-86 Torrington Company report does not provide sufficient documentation about the extent of the contamination found or demonstrate that all appropriate clean-up action was completed. Consequently, it is strongly recommended that all reports and laboratory analytical data pertaining to these matters be obtained from the Torrington Company and reviewed in order to determine whether appropriate clean-up action has been completed and whether the available Torrington Company materials provide sufficient documentation.

2. Groundwater Quality

Several conditions were noted during the EIS inspection which were indicative of potential groundwater contamination at this facility. These conditions include the nature of the operations (substantial use of potential contaminants such as solvents, cutting oils, etc.), the age of the facility (80-100 years), and the on-site physical facilities (underground tanks, a solvent still, dry wells, drainage ponds, floor drains, etc.).

A new owner of the property could be held liable for groundwater clean-up costs if the site was found to be responsible for any contamination found, even if the new owner did not produce that contamination. If clean-up action is found to be necessary, groundwater clean-up costs could easily amount to several hundred thousand dollars or more.

Several groundwater monitoring wells and water supply wells already exist on the property. It is strongly recommended that all reports and sampling and analytical data pertaining to the water supply and groundwater monitoring wells be

obtained from the Torrington Company and reviewed in order to determine whether sufficient documentation is available on the groundwater quality. It is further recommended that the on-site wells be sampled and the water samples subjected to laboratory analysis in order to determine whether the groundwater may be contaminated at the present time.

3. Asbestos-Containing Materials

During the EIS inspection, significant quantities of asbestos-containing pipe insulation, some in poor and friable condition, and other materials suspected to contain asbestos were noted. There are EPA and OSHA regulations which pertain to asbestos-containing materials. The EPA regulations require that prior notification be given to regulatory agencies before renovating a building with more than 260 linear feet of friable asbestos pipe insulation or more than 160 square feet of other friable asbestos material and that there can be no emissions of particulate asbestos materials to the outside air. The OSHA regulations cover workers and occupants of buildings which contain asbestos-containing materials. These regulations specify permissible exposure limits and actions required when these limits are exceeded. Substantial monetary penalties may be imposed for violations of these regulations. Removal (abatement) of the asbestos-containing materials is also regulated and would be costly.

It is recommended that the building be surveyed by an accredited inspector to identify the location and quantity of asbestos-containing materials. This survey would include sampling and laboratory analysis of suspect materials. The results of this survey could then be used to develop cost estimates for any corrective action which may be indicated.

4. Hazardous Waste Disposal

Hazardous wastes such as spent solvents may have been generated by the Torrington Company facility. If such wastes were improperly disposed of on-site with resultant contamination, a new owner of the property could be held liable for any necessary clean-up activities. Consequently, it would be prudent for a new owner to have documentation available indicating that proper disposal was used for any hazardous wastes generated by the Torrington Company.

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It is recommended that Material Safety Data Sheets (MSDS) for all chemicals used by the Torrington Company be obtained and reviewed in order to determine what hazardous wastes may have been generated. All documentation (i.e. manifests, etc.) pertaining to Torrington Company disposals of hazardous waste should also be obtained and reviewed in order to determine whether sufficient documentation of proper disposal is available.

5. Site, Building and Mechanical Drawings

During the EIS inspection, the presence of dry wells and evidence of the possible presence of underground tanks and other non-sewered drainage systems were noted. In order to locate any remaining potential sources of contamination on the property for which a new owner may be held liable, complete information is needed on the present and historic locations of tanks, piping, drainage systems, etc., at the site.

It is recommended that complete drawings on the site be obtained and reviewed. These drawings should indicate present and historic locations of all underground tanks, drainage systems, sewer locations, etc. in order to identify potential contamination sources. Field investigation should be conducted to obtain any information which is not available from these drawings.

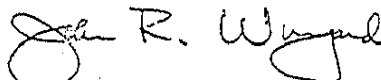
6. PCB-Containing Transformers

At least three (3) of the existing transformers at the site were indicated as containing oils with PCB's by the Torrington Company. It should be noted that the disposal of these transformers would entail the additional costs associated with toxic wastes.

Please feel free to contact me should you have any questions.

Sincerely,

EIS ENVIRONMENTAL ENGINEERS, INC.



John R. Wingard, P.E.
Senior Engineer

JRW/jmd