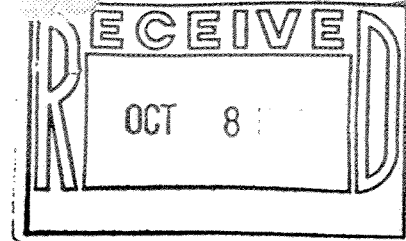


PEREGRINE ENVIRONMENTAL
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20 NORTH WACKER DRIVE, SUITE 1260, CHICAGO, IL 60606

TECHLAW INC.

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MEMO

To: Mr. Neil Saiz, Peregrine US Inc.
From: William S. Wesley, Work Assignment Manager, TechLaw, Inc.
Subject: Preliminary Assessment/Visual Site Inspection Report
Date: September 30, 1998

Please find enclosed a copy of the Preliminary Assessment/Visual Site Inspection (PA/VSI) Report for your facility. The report summarizes the results of the Preliminary Assessment (PA) and Visual Site Inspection (VSI) conducted for the facility. The PA/VSI Report has been approved by Mr. Gerald Phillips of the U.S. EPA Region 5. Mr. Phillips requested that TechLaw, Inc. forward a copy of the final report to you.

Thank you for your cooperation during the PA/VSI process. If you have any questions regarding the PA/VSI Report, please call Mr. Phillips at 312/886-0977.

**PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT
FOR
PEREGRINE, INC.
(FORMER GENERAL MOTORS CORPORATION INLAND FISHER GUIDE
COLDWATER ROAD MANUFACTURING FACILITY)
G-1245 E. COLDWATER ROAD
FLINT, MI 48559-001
EPA ID NO. MIR000020743**

Submitted to:

**Mr. Gerald Phillips
U.S. Environmental Protection Agency
Region 5 D-8J
77 West Jackson Boulevard
Chicago, Illinois 60604**

Submitted by:

**TechLaw, Inc.
20 North Wacker Drive, Suite 1260
Chicago, Illinois 60606**

**EPA Work Assignment No.
Contract No.
TechLaw WAM
Telephone No.
EPA WAM
Telephone No.**

**R05052
68-W4-0006
Mr. William Wesley
312/345-8955
Mr. Gerald Phillips
312/886-0977**

August 19, 1998

PRELIMINARY ASSESSMENT/VISUAL SITE INSPECTION REPORT
FOR
PEREGRINE, INC.
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I. EXECUTIVE SUMMARY

The RCRA Facility Assessment (RFA) is the first step in implementing the corrective action provisions of the 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA). The purpose of the RFA is to identify environmental releases or potential releases from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) that may require corrective action by the facility owner. A Preliminary Assessment/Visual Site Inspection (PA/VSI) is a form of an RFA suitable for implementing the corrective action provisions of HSWA. This PA/VSI Report constitutes the reporting requirement for the RFA at the Peregrine, Inc. (Peregrine) facility at G-1245 East Coldwater Road in Flint, Michigan.

A preliminary assessment (PA) of the available U.S. Environmental Protection Agency (U.S. EPA) and State of Michigan file materials was conducted to familiarize the TechLaw, Inc. (TechLaw) Team with past compliance history, evidence of past releases, potential migration pathways, potential for exposure to any released hazardous constituents, closure methods and dates, citizen complaints, manufacturing processes and waste management practices at the Peregrine facility. A Visual Site Inspection (VSI) was conducted on July 7, 1998 by TechLaw to identify and characterize SWMUs and AOCs. Information and file material was provided to the TechLaw Team during the VSI by Mr. Dave Rymph, Director, Environment Health and Safety, Peregrine; Mr. Neil Saiz, Environmental Health and Safety Manager, Peregrine; Ms. Jean Caufield, Remediation Group, General Motors Corporation (GM); and Mr. Bob Pearce, Remediation Group, GM. Mr. William Yocum of the Michigan Department of Environmental Quality (MDEQ) was also present during the VSI. Photographs were taken during the VSI and are documented in Appendix A. The VSI Field Notebooks are included in Appendix B, and a site location map and maps showing SWMU and AOC locations are presented in Appendix C.

A total of 10 SWMUs and two AOCs were identified during the PA/VSI. These are described in more detail in Sections III and IV of this report. Many of the units identified in the PA were no longer operational at the time of the VSI and the underground storage tank (UST) unit (SWMU 3) which existed at the site was identified as closed following several phone conversations with Mr. Yocum and Mr. Cliff Akujobi of the MDEQ Leaking UST (LUST) Division. During the VSI, five new SWMUs were identified based on current Peregrine operations.

Three documented releases associated with the Former USTs (SWMU 3) were identified at the Peregrine site. Reportedly, subsequent to these releases, the Former USTs (SWMU 3) were properly closed according to the criteria of the MDEQ LUST Division. No other documented releases from any of the other SWMUs at the facility were identified during the PA/VSI. However, as a result of this PA/VSI four SWMUs and two AOCs have been assigned moderate release potentials due to past or current waste management practices at the site. In addition, it is suggested that U.S. EPA maintain contact with MDEQ regarding the closure status of the Former Drum Storage Area (SWMU 1) and the Waste Pile Pad (SWMU 2).

II. SITE DESCRIPTION

The Peregrine facility is located at G-1245 E. Coldwater Road, in an area of Genesee County in the northeast portion of the City of Flint, Michigan that is zoned general industrial. The site is bordered by Coldwater Road to the south, Horton Street to the west, a railroad right of way to the east and the General Motors property and Stanley Road to the north. There are also properties zoned residential urban and residential urban multiple family and some general and light industrial properties in the area surrounding the facility.

The Peregrine facility was formerly owned and operated by General Motors Corporation Inland Fisher Guide (IFG) Division, and was known as the GM Flint Coldwater Road Plant (MID005356860). While owned and operated by GM, the GM facility manufactured automobile body hardware, operated its own power house and wastewater treatment plant and operated a plating process which produced large amounts of sludges from onsite treatment of waste water. The GM operations at the facility included metal stamping, heat treating, small parts plating (zinc, chromium, and copper/zinc/cyanide), and parts assembly. According to GM personnel, it is believed that the property was farmland prior to the 1950s. GM began operations at the facility in approximately 1952 following an approximately one year period of operation as an automobile manufacturing facility by the Turnstead Company.

The facility is currently owned and operated by Peregrine, Inc. (25200 Telegraph Road, Fourth Floor, Southfield, Michigan). Peregrine manufactures automobile door hinges and window regulators at the site and operations include stamping and assembly, with some spot welding. According to Peregrine personnel, no machining, painting, heat treating, or plating takes place at the facility. Peregrine purchased the manufacturing portion of the former GM facility from GM on December 10, 1996 and Peregrine operations began on January 2, 1997.

The facility occupies approximately 118.7 acres and contains almost 2.0 million square feet of manufacturing and building space. Building 44, the largest building on the Peregrine property, houses the manufacturing floor, Building 44A contains administration offices, Building 45 is the power house, Building 63 contains scrap metal and equipment storage facilities and Building 66 contains the Current Hazardous Waste Storage Area (SWMU 5). The plant stores and manufactures automotive hardware components using stamping, welding and assembly processes.

The agreement between GM and Peregrine related to Peregrine's purchase of the facility in 1996 is reportedly confidential for competitive and contractual reasons. Because of the agreement, neither GM nor Peregrine representatives were willing to speak freely regarding many aspects of the environmental history of the site. Peregrine representatives would not openly discuss environmental issues they had observed since their occupation of the site that could be attributed to former GM operations. No GM personnel with knowledge of previous site operations or waste handling practices were available to answer questions during the VSI or during the four weeks following the VSI.

Satellite Accumulation Areas (SWMU 4) are located in Building 44. During the VSI, a Satellite Accumulation Area (SWMU 4) for the temporary storage of used aerosol paint cans and used batteries was observed in the General Stores area in the basement of Building 44. According to the Peregrine Environmental Incident Response Plan and Spill Prevention Control and Countermeasures Plan, dated March 10, 1997, and according to Peregrine personnel, other satellite accumulation points include the following:

- Waste paint and paint related materials in the Maintenance Paint Booth and small part marking operations. The paint booth at the Peregrine facility was non-operational at the time of the VSI.
- Spent heat furnace salt is generated in the Tool Room. The TechLaw Team was informed during the VSI that heat furnace salt was no longer generated. The barium salts were generated through heat treating maintenance tools and equipment, not automobile parts, according to Peregrine personnel.
- Emergency light batteries and PCB/non-PCB lighting ballasts could be accumulated in the Electrical Repair Shop. During the VSI all fluorescent lights and light ballasts were stored in Building 66. All waste batteries were stored in General Stores.
- Spent solvent generated from parts washers used during maintenance cleaning operations in the facility is managed by an outside environmental company. The spent solvent is accumulated in the Machine Repair Shop from miscellaneous maintenance operations. The solvent used at the time of the VSI was a petroleum naphtha which was engineered to have a flashpoint $>140^{\circ}\text{C}$. Small parts washers are not considered part of SWMU 4 in this PA/VSI report.

All hazardous waste from the Satellite Accumulation Areas (SWMU 4) are transported to the Current Hazardous Waste Storage Area (SWMU 5) prior to off-site treatment or disposal. The Current Hazardous Waste Storage Area (SWMU 5) is operated as a less than 90-day generator storage area.

Friable asbestos waste may be generated during building demolition/renovation activities at the site. All asbestos operations are currently conducted by licensed asbestos removal contractors with asbestos wastes reportedly properly removed and containerized. Any suspected asbestos-containing materials are sampled and analyzed prior to reconstruction or demolition activities to determine asbestos content, if any. All asbestos waste is shipped off-site to an approved landfill.

A power house is located on Peregrine property to the northwest of Building 44. Four power house diesel fuel Above Ground Storage Tanks (ASTs) (one 1,000 gallon AST and three 250 gallon ASTs) are located east of the power house. These four ASTs are surrounded by a three inch high containment curb, with approximately 500 gallons of containment volume. The power house basement houses additional product ASTs containing neutralizer, caustic, boiler

Approximately 6,000 gallons/month of oily water waste is currently generated by Peregrine (70% water, 30% waste metal drawing lubricant) through their parts stamping operations. This wastewater is managed by the Wastewater Storage Tanks (SWMU 6). Approximately 90% of the storm water discharged from the property enters the Hughes Drain to the northwest of the site near Stanley Road and Saginaw Street. The remaining storm water discharged from the property enters a storm sewer main to the south of the facility.

The Former Drum Storage Area (SWMU 1) located north, and immediately adjacent to, the manufacturing facility (Building 44) consisted of a concrete pad and associated sump. The pad had dimensions of 42 feet by 72 feet and had the capacity to store 648 standard 55-gallon drums. According to file material the pad was previously surrounded by a fence. However, no fence was present during the VSI. GM is apparently responsible for the closure of this unit.

* An abandoned incinerator building is located directly to the east of the power house. According to the U.S. EPA VSI Report dated April 7, 1987, old, rusty incinerator equipment and accessories were contained inside the building and ponded water was observed within the low concrete floored areas of the building. The ponded water was presumed to be rainwater which might have seeped through cracks in broken windows of the abandoned building. Except for the rusty, old appearance of the inside building equipment, piping and other accessories, there were no discolorations of the surrounding flooring and walls noted during the April 7, 1987 VSI. The incinerator building was not inspected during the June 7, 1998 VSI. The abandoned incinerator building was not considered a SWMU during this PA/VSI because there was no indication that this building ever managed material other than non-hazardous trash, scrap wood and cardboard.

During the July 7, 1998 VSI, 11 above-ground, steel Caustic Tanks (AOC B) each with dimensions of approximately four feet by six by six feet, were observed immediately west of the Former Drum Storage Area (SWMU 1) against Building 44. All of the Caustic Tanks (AOC B) were covered with lids and were empty at the time of the VSI. At least one of the tanks was observed to have a crack along the bottom edge suggesting that the tanks were not going to be put back into service. There was no indication how long the tanks had been located in this area or what length of time the crack that was observed had existed. According to GM personnel, the Caustic Tanks (AOC B) were used for cleaning sheet metal prior to coating. The related coating operations took place on the second floor of Building 44. The GM representative who supplied information on the purpose of these tanks suggested that the tanks were located in this area because of space restrictions in the coating area on the second floor. The tanks are underlain by asphalt in the asphalt driving/parking area north of Building 44 and are raised several inches off of the ground on supports.

During the July 7, 1998 VSI, a paint storage room was observed in the southeast corner of Building 63. The paint storage room contained three drums of copper scrap and a drum of housekeeping waste. Several months prior to the July 7, 1998 VSI, several drums of "off-specification" paint were reportedly cleaned out of the paint storage room, temporarily stored in

August 10, 1984. The treatment, storage, and disposal operations were subject to the interim status requirements of R299.9601 and 40 CFR Part 265.

On April 7, 1987, U.S. EPA, with assistance from MDNR, conducted a VSI of the GM facility. The resulting VSI Report was dated May 28, 1987. Although some areas of the facility were not included in the VSI Report, the VSI Report identified several SWMUs that were on what is now the Peregrine portion of the facility. The Former Drum Storage Area (SWMU 1) was identified in the VSI Report as SWMU 10 and this SWMU was identified as an Act 64/RCRA regulated unit.

A report titled "Closure Plan and Post-Closure Plan (Volumes I and II) August 1989, O'Brien and Gere, Engineers, Inc." was submitted to the Michigan Department of Natural Resources (MDNR) and approved in accordance with 40 CFR 265.112(d)(4) on September 7, 1989. The only area of the Peregrine property included in the Closure Plan was the Former Drum Storage Area (SWMU 1).

GM entered into a Consent Order with the MDNR (currently the MDEQ) in October 1992 to close units at the site in accordance with the approved Closure Plan. During closure activities, additional areas of potential concern were identified and included in the closure program. One additional unit, the Waste Pile Pad (SWMU 2), was identified on what is now Peregrine property. Documentation of closure activities for all of the units was provided in the November 1994 Draft Closure Certification Documentation Package, Inland Fisher Guide Division General Motors Corporation, Surface Remediation Project, Coldwater Plant which was submitted to the MDEQ.

According to an October 31, 1994 MDNR Project Update, the Former Drum Storage Area (SWMU 1) and the Waste Pile Pad (SWMU 2) were closed in accordance with GM's closure plan. The November 1994 Draft Closure Certification Documentation Package prepared by Weston Consultants on behalf of GM, also describes the closure activities which took place at these SWMUs. In an August 6, 1998 phone conversation between TechLaw and Ms. Kimberly Tyson, a permit writer with MDEQ with responsibilities for the GM Coldwater Road Plant closure, Ms. Tyson stated that she will conduct a site visit and determine the closure status of these and the other units covered under GM's closure plan before September 30, 1998.

According to a letter sent to GM by MDEQ, dated December 26, 1996, an inspection was conducted at the GM facility on August 15, 1995. The December 26, 1996 letter indicates that the MDEQ determined that GM corrected the observed Part 111 violations identified in the compliance letter dated September 6, 1995.

A Notification of Regulated Waste Activity was submitted by Peregrine to MDEQ on December 23, 1996, a Subsequent Notification was sent January 7, 1997, and a Subsequent Notification was sent on April 11, 1997. According to a letter from MDEQ to Peregrine dated January 23, 1997, their waste streams were D001, D002, D005, D006, D007, D008, D009, D018, D039, D040, F005, F006, U070, 003D and 039L. The April 11, 1997 Subsequent Notification

The three water bearing zones (perched zone, drift and bedrock aquifers) are separated by semi-confining layers of clay. Water movement from the perched zone, if present at all, would be restricted. Large differences in the static water levels between the perched zone, drift aquifer, and the bedrock aquifer indicate that there is little if any communication. The groundwater flow direction in the surficial perched zone is controlled somewhat by the topography and is generally westerly toward the small wetland found west of the sludge drying beds and landfarm area located on GM property. Groundwater flow in the glacial drift aquifer is toward the south/southeast away from the nearby domestic wells along Stanley Road. Groundwater flow directions in the bedrock have not been established at this site. Available well logs indicate that domestic wells in the area are set in the drift aquifer (between the two clay horizons) and in the bedrock.

Release History

Neither the GM nor the Peregrine personnel involved in the July 7, 1998 VSI had any knowledge of any releases on the property. However, Mr. Akujabi of the MDEQ LUST Division identified, during a brief review of his file material, that MDEQ had a record of three releases associated with the GM Inland Fisher Guide Coldwater Road Facility. According to Mr. Akujabi, the Peregrine property is still considered as GM property in the MDEQ LUST files. Therefore, it is not known at this time whether any, or perhaps all, of the releases identified in the MDEQ file material are associated with the two 2,000 gallon Former USTs (SWMU 3) located on Peregrine property or with USTs located on GM property. The material that was released and the quantity involved were not available to Mr. Akujabi within the timeframe of this PA/VSI. Two of the releases noted in Mr. Akujabi's file were identified/detected in 1990 and assigned the release numbers C-2242-90 and C-2356-90. The third release was identified/detected in 1997 and assigned the release number C-982-97. During the April 7, 1987 VSI, an apparent overflow and some staining within the concrete containment berm for the fill pipe at the Former USTs (SWMU 3) location was observed. However, the reported presence of a concrete pad and berm surrounding the fill pipe make it unlikely that waste oil or lubricants from the operation of these Former USTs impacted environmental media.

III. § SOLID WASTE MANAGEMENT UNITS

A total of 10 SWMUs and two AOCs were identified during the PA and VSI. The SWMUs and AOC are listed in Table 1 on the following page.

This section presents descriptions of the SWMUs identified during the PA and VSI at Peregrine, Inc., facility and Section IV provides a description of the AOCs. Photograph numbers correspond to those presented in the Photograph Log in Appendix A. A map showing SWMU and AOC locations is presented in Appendix C.

SWMU 1 - Former Drum Storage Area

Report Photograph No(s): 1 and 2

Logbook Photograph No(s): 1-4 and 1-2

Period of Operation: Unknown startup date but was active in 1987 and closed as of September 1994.

Location: The Former Drum Storage Area (SWMU 1) is located north of, and immediately adjacent to, the manufacturing facility (Building 44). The sump that is associated with the Former Drum Storage Area (SWMU 1) is located in the southwest corner of the pad under a small enclosure.

Physical Description: The Former Drum Storage Area (SWMU 1) consisted of a fenced area with dimensions of 42 feet by 72 feet, with a capacity to store 648 standard 55-gallon drums. The drums stored on the pad were placed on wooden pallets. According to the RCRA Part B Application Response dated September 1985, GM had rearranged the drum storage area to provide a minimum of three feet between the drums and the fence and between rows of drums. According to the U.S. EPA VSI Report dated April 7, 1987, the Former Drum Storage Area (SWMU 1) was less than 1/3 full of drums placed on wooden pallets and drainage of the area was directed to an underground sump just outside the fence line. Drummed hazardous waste was reportedly stacked three high prior to 1985, yet in 1995 GM stated their intention to only stack drums two high. Wastes stored at the drum storage area were generated by parts finishing and washing, maintenance cleaning, and paint dip operations at the facility.

Secondary containment for the Former Drum Storage Area (SWMU 1) was provided by a 4 inch high concrete curb around the perimeter of the pad. A sump in the southwest corner of the pad collected drainage and waste residues from the pad. The sump consisted of two 8 feet deep concrete chambers. The first chamber collected sediment and overflowed liquid to the second concrete chamber. A pump then discharged liquid accumulated in the second chamber directly to the WWTP which is currently located on GM property to the north of the Peregrine facility.

During RCRA closure activities at the Former Drum Storage Area (SWMU 1), the concrete pad was reportedly triple-rinsed with high pressure water and scrubbed with detergent. All wash and rinsate was pumped directly from the sump to the WWTP via an existing pipeline. Verification sampling and analysis of the final rinse of the concrete pad indicated decontamination of the pad to the background cleanup requirements specified in the Closure Plan. During closure activities, the east sump chamber contained approximately 10 cubic yards of gritty, oily sludge. The west sump chamber contained two feet of standing water with a trace of sludge. The water was pumped directly to the WWTP by the existing pump. The remaining sludge was sampled and analyzed. Analytical results indicated that the sludge was classified as characteristic hazardous waste for barium, chromium, lead and mercury (D005, D007, D008 and D009). The sludge was

SWMU 2 - Waste Pile Pad

Report Photograph No(s): 3 and 4

Logbook Photograph No(s): 1-9 and 1-10

Period of Operation: The unit was apparently active prior to 1987, inactive in 1987, and has been used by Peregrine since 1997.

Location: The Waste Pile Pad (SWMU 2) is located outdoors east of Building 44 and north-northeast of Building 63.

Physical Description: The Waste Pile Pad (SWMU 2) is a 60 feet by 40 feet concrete pad used as a temporary storage area for nonhazardous wastes prior to off site disposal. Peregrine also uses the pad to sort through trash from waste bins and garbage cans from around the plant. Peregrine stated during the July 7, 1998 VSI that sometimes material such as used oil, thought to be from plant employees changing the oil in their cars in the parking lot of the plant, is recovered from the garbage containers. For the purpose of this VSI the paved area immediately north of the pad which contained a 30 yard roll-off box used for consolidating refuse, an accumulation drum for used oil, and two garbage bins is also considered part of the Waste Pile Pad (SWMU 2). At the time of the April 7, 1987 VSI, the unit was thought to be inactive and contained construction rubble, a small amount of non-hazardous trash and debris, a small pile of soil, and some ponded water. The trash that is consolidated into the 30 yard roll-off box is removed from the site by Valley Rubbish.

The Waste Pile Pad (SWMU 2) is equipped with an underground drainage system which is directed to the Wastewater Storage Tanks (SWMU 6). The drain for the drainage system is oriented north/south along the center of the long axis of the pad. The unit has a 1.5 foot high curb on the east side and the concrete floor is sloped to direct run-off to the underground drainage system.

Under a Consent Order with MDNR (currently MDEQ), the Waste Pile Pad (SMWU 2) was identified as an additional area of potential concern and was included in the facility's RCRA closure program. During closure activities at the Waste Pile Pad (SWMU 2), a small amount of miscellaneous nonhazardous debris was removed from the pad prior to the pad cleaning. This debris was transported for disposal at the Richfield Landfill in Genesee County, Michigan. The surface of the Waste Pile Pad was reportedly decontaminated by triple rinsing with high pressure water, scrubbing with detergent, and a final rinse. All wash and rinsate waters were treated in the on-site WWTP. The wash waters from the final rinse were sampled and analyzed in accordance with the Closure Plan. GM reports that the analyses confirmed decontamination of this unit to the background cleanup requirements specified in the Closure Plan. In an August 6, 1998 phone conversation between TechLaw and Ms. Kimberly Tyson, a permit writer with MDEQ with

SWMU 3 - Former USTs

Report Photograph No(s): None

Logbook Photograph No(s): None

Period of Operation: 1972 - unknown. The tanks were still active as of the April 7, 1987 VSI, but Peregrine representatives indicated that the tanks were no longer existent at the site at the time of the July 7, 1998 PA/VSI.

Location: The two Former USTs were located outside along the eastern wall of the manufacturing building near building grid S-10.

Physical Description: Two 2,000 gallon USTs were used for the storage of used oil and lubricants during GM's operations at the site. These tanks are mentioned in file material (i.e., the April 7, 1987 VSI) yet neither Peregrine nor GM representatives had any knowledge of the use, removal, location, or design of these USTs. The USTs apparently were located against the east side wall of the plant and surrounded by a concrete berm.

Mr. Akujabi of the MDEQ LUST Division noted, during a brief review of file material, that MDEQ had record of three UST closures at the GM Inland Fisher Guide Coldwater Road facility. According to Mr. Akujabi, the current Peregrine property is still considered as GM property in the MDEQ LUST Division's files. Mr Akujabi could not definitively state whether any, or all, of the three tanks that were closed were in fact located on Peregrine property. Mr. Akujabi was not able to say whether the tanks were closed in place or removed from the site.

Wastes Managed: The Former USTs (SWMU 3) managed an unknown volume of used oil and lubricant.

History of Releases: During the April 7, 1987 VSI, a sump overflowed (presumably around the fill pipe) with waste oil almost to the level of the concrete floor was observed. Oil stains were evident throughout the surrounding concrete area. According to the 1987 VSI, these tanks were never leak tested. Also, the 1987 VSI indicated that plans were under way to close both tanks. However, no information regarding tank closure was available in the file material.

During an August 12, 1998 phone conversation, Mr. Akujabi of MDEQ noted that three releases were associated with the former USTs found in the MDEQ LUST Division file material for the GM Inland Fisher Guide Coldwater Road facility (which includes the current Peregrine property). The releases occurred in 1990 and 1997 and were assigned the release numbers C-2242-90, C-2356-90, and C-982-97. It is unknown at the time of this PA/VSI whether or not any of these releases are associated with the Peregrine property. All three of the USTs associated with these releases were reportedly closed to the satisfaction of the MDEQ LUST Division.

SWMU 4.- Satellite Accumulation Areas

Report Photograph No(s): 5

Logbook Photograph No(s): 1-13

Period of Operation: Unknown to present

Location: Several Satellite Accumulation Areas (SWMU 4) exist within the facility including the area in the basement of Building 44 in General Stores.

Physical Description: The Satellite Accumulation Areas (SWMU 4) are predominantly 55-gallon drums used for the temporary storage of hazardous wastes. An area within General Stores is used for the temporary storage of used aerosol paint cans and used batteries. According to the Peregrine Environmental Incident Response Plan and Spill Prevention Control and Countermeasures Plan, dated March 10, 1997, and according to Peregrine personnel, other satellite accumulation points could manage waste paint and paint related materials from the Maintenance Paint Booth and small part marking operations, spent heat furnace salt from the Tool Room, and emergency light batteries and PCB/non-PCB lighting ballasts related to building maintenance. During GM operations, spent solvent generated from parts washers used during maintenance cleaning operations in the facility may have been located throughout the facility. Material in the Satellite Accumulation Areas (SWMU 4) is taken to the Current Hazardous Waste Storage Area prior to transport off site.

Wastes Managed: Used batteries, PCB and non-PCB lighting ballasts, aerosol cans, and heat furnace salt.

History of Releases: No evidence of a release was identified for this unit during the PA/VSI.

Potential for Past/present Release:

High	()
Moderate	()
Low	(X)

Conclusions: The unit is located indoors on concrete floors. No evidence of releases were identified during the VSI. Therefore, no further action appears warranted for this unit at this time.

SWMU 5 - Current Hazardous Waste Storage Area (Continued)

Potential for Past/present Release:

High	()
Moderate	()
Low	(X)

Conclusions: This unit is located indoors, on a concrete floor, and is equipped with secondary containment. There is no evidence of releases from this unit. Therefore, no action appears warranted for this unit at this time.



SWMU 6 - Wastewater Storage Tanks, (Continued)

Conclusions: Based on the condition and location of this unit, it appears that no action is warranted for this unit at this time.

SWMU 8,- Scrap Metal Storage Area

Report Photograph No(s): 11 and 12

Logbook Photograph No(s): 1-11a and 1-11b

Period of Operation: Unknown through present.

Location: The unit is located indoors in the northwest-central portion of Building 63.

Physical Description: The Scrap Metal Storage Area (SWMU 8) is a series of five approximately 8 feet by 10 feet by 10 feet deep concrete storage bins that are used to sort and store scrap metal prior to transport off site for recycling. The scrap metal is brought over to Building 63 in bins and sorted according to metal-type and size. Waste lubricant that drains from the metal during storage is periodically pumped out of the tanks and transported to the Wastewater Storage Tanks (SWMU 6). Each of the bins are constructed of concrete and are lined with steel shielding to prevent wear. Some wear was observed on visible portions of the bins. However, other portions of the bins (such as the bottoms) could not be seen because they were covered with scrap metal at the time of the VSI.

Wastes Managed: The unit manages scrap metal and metal drawing lubricants made of saturated animal fats. Facility representatives could not provide information regarding whether the Scrap Metal Storage Area (SWMU 8) was used to manage scrap metal and petroleum based lubricants during GM's operations at the site.

History of Releases: Though much of the concrete floor surrounding the Scrap Metal Storage Area in Building 63 appeared to have been stained with oils, no systematic release of lubricants to the building floor, or other areas outside of SWMU 8, was identified during the PA/VSI.

Potential for Past/present Release:	High	()
	Moderate	(X)
	Low	()

Conclusions: No action is warranted for this unit at this time. On July 7, 1998 Peregrine announced that they would be closing this facility at the end of 1998. Upon closing the plant, the Scrap Metal Storage Area (SWMU 8) bins should be inspected and, if necessary, integrity-tested to determine if any subsurface releases may have occurred from this unit.

SWMU 9 - Former Plating Areas (Continued)

unknown. The tank was surrounded by a six inch high curb apparently to control overflow. According to GM personnel, spent plating solutions from the first floor, in approximately the same area (location F-30) as the tank observed in the basement, were directed to this area through floor drains and then the spent plating solutions were pumped through the series of Overhead Waste Pipes (SWMU 10) to the WWTP.

Wastes Managed: Zinc, chromium, and copper/zinc/cyanide acidic plating solutions were managed in the Former Plating Areas (SWMU 9) according to GM personnel.

History of Releases: No evidence of a release was noted for this unit during the PA/VSI. However, the condition of the former spent plating solution collection tank could not be observed since the unit had been filled with concrete. Also, the condition of other waste plating solution collection areas could not be determined because their locations were not known by available facility representatives during the July 7, 1998 VSI.

Potential for Past/present Release:

High	()
Moderate	(X)
Low	()

Conclusions: Little information was available during the PA/VSI to determine the integrity, release history, waste management practices and decommissioning of the plating tanks and associated waste plating solution collection areas related to this unit. It is recommended that concrete coring followed by soil sampling be conducted for the former plating operations in Building 44 where the concrete waste plating solution collection areas are underlain by soil in order to determine whether these areas have released plating solutions to the soil or groundwater at the facility.

IV. AREAS OF CONCERN

This section presents descriptions of the AOCs identified during the PA and VSI at Peregrine, Inc. facility. The photograph numbers correspond to those presented in the Photograph Log in Appendix A. The location of the AOCs are shown in Appendix C.

AOC B - Caustic Tanks

Report Photograph No(s): 1 and 17

Logbook Photograph No(s): 1-4 and 1-3

Period of Operation: Unknown

Description: Eleven above-ground, steel Caustic Tanks (AOC B) with dimensions of approximately four feet by six by six feet, were observed immediately west of the Former Drum Storage Area (SWMU 1) against building 44. All of the tanks were covered with lids. Two tanks were inspected during the VSI and were observed to be empty. One of the two tanks which was inspected during the VSI was observed to have a crack along the bottom edge suggesting that the tanks were not going to be put back into service. There was no indication how long the tanks had been located in this area or what length of time the crack that was observed had existed. The crack appeared to be a result of rusting.

Peregrine representatives stated that the tanks were not related to any Peregrine operations. Stencil on the side of one of the tanks stated "Lockout Caustic Tank Drain Valve Bay E-34 Second Floor Before Working on Tanks and Lines." It appears possible that these tanks may have had some waste handling purpose if the tanks were associated with a "caustic tank drain valve" on the second floor (gravity drain from second floor to ground level). However, according to GM personnel, the Caustic Tanks (AOC B) were used for cleaning sheet metal prior to coating and the related coating operations took place on the second floor of Building 44. The GM representative who supplied information on the purpose of these tanks suggested that the tanks were located in this area because of space restrictions in the coating area on the second floor. The tanks are underlain by asphalt in the asphalt driving/parking area north of Building 44 and are raised several inches off of the ground on supports. The asphalt surrounding AOC B was observed to contain cracks. However, inspection of the integrity of the asphalt in this area was prevented by the close spacing of the tanks. Based on the use of liquids in a production process in this area and the apparent lack of secondary containment other than asphalt that currently contains cracks, it appears that a moderate potential exists for this unit to have released hazardous constituents to soil or groundwater.

Conclusions: Little information was available during the PA/VSI to determine the integrity, release history, waste management practices and decommissioning of the Caustic Tanks (AOC B). It is recommended that soil samples be collected from beneath the asphalt in the area of the Caustic Tanks in order to determine whether the Caustic Tanks (AOC B) have released metals to the soil or groundwater at the facility.

V. CONCLUSIONS

Based on the available file material and observations made at the time of the VSI, the following actions under Corrective Action authorities are recommended.

It is recommended that U.S. EPA maintain contact with MDEQ regarding the completion of the closure activities for the Former Drum Storage Area (SWMU 1) and the Waste Pile Pad (SWMU 2).

It is recommended that U.S. EPA maintain contact with MDEQ regarding the closure status of the Former USTs (SWMU 3). If MDEQ has no record of proper closure of these USTs, soil and groundwater sampling in the area surrounding the Former USTs (SWMU 3) is recommended.

No action is warranted for the Scrap Metal Management System (SWMU 7) at this time. However, on July 7, 1998 Peregrine announced that they would be closing this facility at the end of 1998. Upon closing the plant, the sumps that exist in Building 44 to manage waste metal drawing lubricant should be inspected and, if necessary, integrity-tested to determine if any subsurface releases have occurred from this unit.

No action is warranted for the Scrap Metal Storage Area (SWMU 8) at this time. On July 7, 1998 Peregrine announced that they would be closing this facility at the end of 1998. Upon closing the plant, the Scrap Metal Storage Area (SWMU 8) bins should be inspected and, if necessary, integrity-tested to determine if any subsurface releases have occurred from this unit.

Little information was available during the PA/VSI to determine the integrity, release history, waste management practices and decommissioning of the plating tanks and associated waste plating solution collection areas related to the Former Plating Areas (SWMU 9). It is recommended that concrete coring followed by soil sampling be conducted for the former plating operations in Building 44 where the concrete waste plating solution collection areas are underlain by soil in order to determine whether these areas have released plating solutions to the soil or groundwater at the facility.

It is suggested that U.S. EPA and/or MDEQ maintain contact with Peregrine and GM regarding the proper decommissioning (draining and disposal) of the Overhead Waste Pipes (SWMU 10) which previously managed spent plating solutions in Building 44. On July 7, 1998 Peregrine announced that they would be closing this facility at the end of 1998. Upon closing the plant, the Overhead Waste Pipes (SWMU 10) which manage wastewater should be properly decommissioned.

The April 7, 1987 VSI concluded that the coal managed in the Coal Storage Area (AOC A) contained hazardous polynuclear aromatic organic constituents (PNAs) stored where release to the surface soil was evident and ongoing. It is recommended that soil and groundwater sampling

VI. REFERENCES

1. - Fisher Body Division General Motors Corporation Flint Coldwater Road Plant, Report on Groundwater Quality Assessment Plant, dated May 29, 1984, by The Chester Engineers, Ann Arbor, Michigan.
2. Certification Regarding Potential Releases from Solid Waste Management Units, letter dated June 18, 1985.
3. RCRA Part B Application Response, dated September 1985.
4. Preliminary Review Report RCRA Facility Assessment, dated March 10, 1987.
5. U.S. EPA VSI Inspection Report of April 7, 1987.
6. U.S. EPA Inspection Conversation Record with O.J. Fockler, dated May 5, 1987.
7. Corrective Action Consent Order with attachments for the General Motors Corporation Inland Fisher Guide Divisions, Coldwater Road facility, dated October 26, 1992.
8. Post Closure Care Plan, dated August 24, 1994.
9. Michigan Department of Natural Resources Project Update, dated October 31, 1994.
10. Draft Closure Certification Package (excerpted portion supplied by GM), dated November 1994.
11. GMC Delphi Interior and Lighting Systems Comprehensive Monitoring Evaluation, dated March 27, 1996.
12. Letter from the Michigan Department of Environmental Quality to General Motors Corporation, dated December 20, 1996.
13. Notification of Regulated Waste Activity submitted by Peregrine to MDEQ on December 23, 1996; Subsequent Notification, dated January 7, 1997; and Subsequent Notification submitted April 11, 1997.
14. Peregrine Environmental Incident Response Plan and Spill Prevention Control and Countermeasures Plan, dated March 10, 1997.
15. Letter from General Motors Corporation to Michigan Department of Environmental Quality, dated March 10, 1998.



APPENDIX A

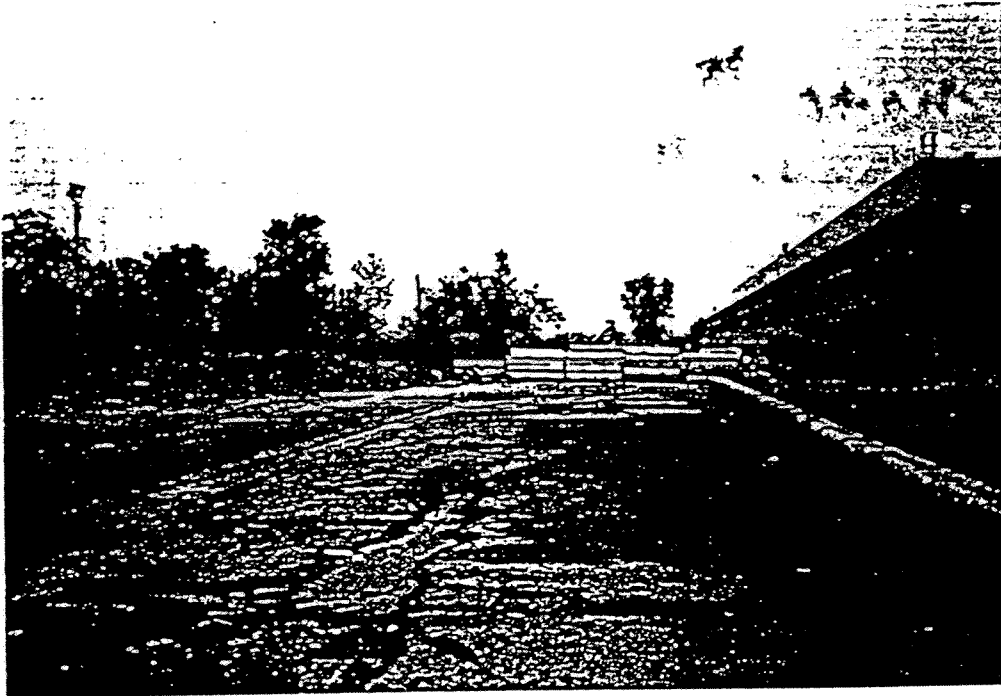
VISUAL SITE INSPECTION PHOTOGRAPH LOG



Report Photograph No.: 1
Logbook Photograph No.: 1-4
Date: July 7, 1998

Time: 1022
Direction: Southwest

Description: View across the Former Drum Storage Area (SWMU 1). The sump is enclosed in the light blue shed in center of photograph. The containment curb is visible surrounding the pad. The Caustic Tanks (AOC B) may be seen immediately to the right of the Sump shed against Building 44.



Report Photograph No.: 3
Logbook Photograph No.: 1-9
Date: July 7, 1998

Time: 1050
Direction: South

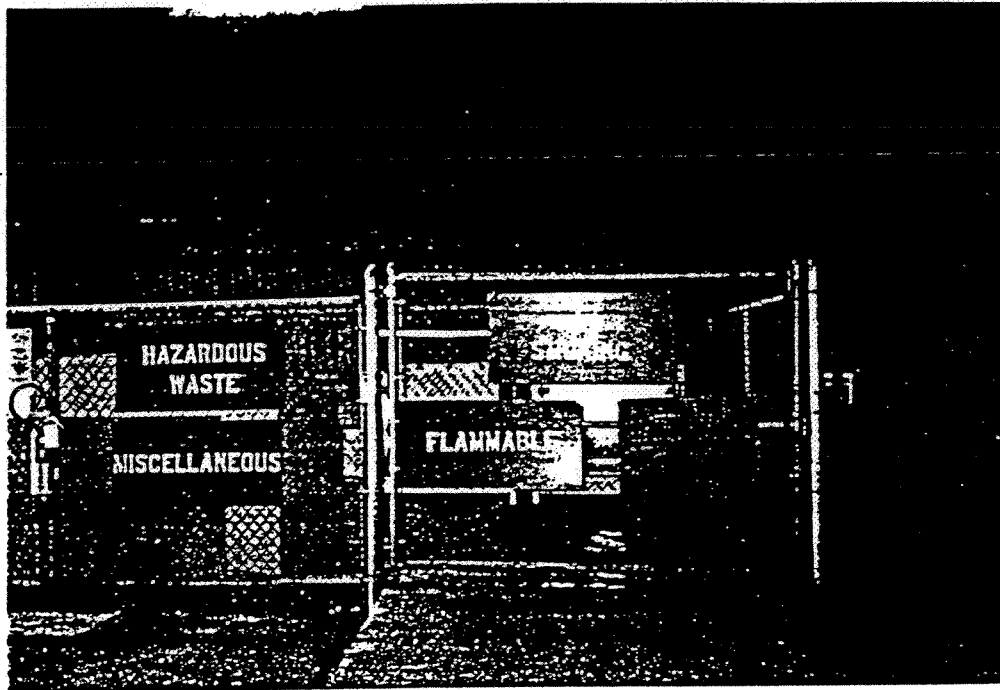
Description: The Waste Pile Pad (SWMU 2) with Building 63 visible on the right side of the photograph. The line drain which manages runoff from the pad may be seen toward the left side of the photograph.



Report Photograph No.: 5
Logbook Photograph No.: 1-13
Date: July 7, 1998

Time: 1139
Direction: South

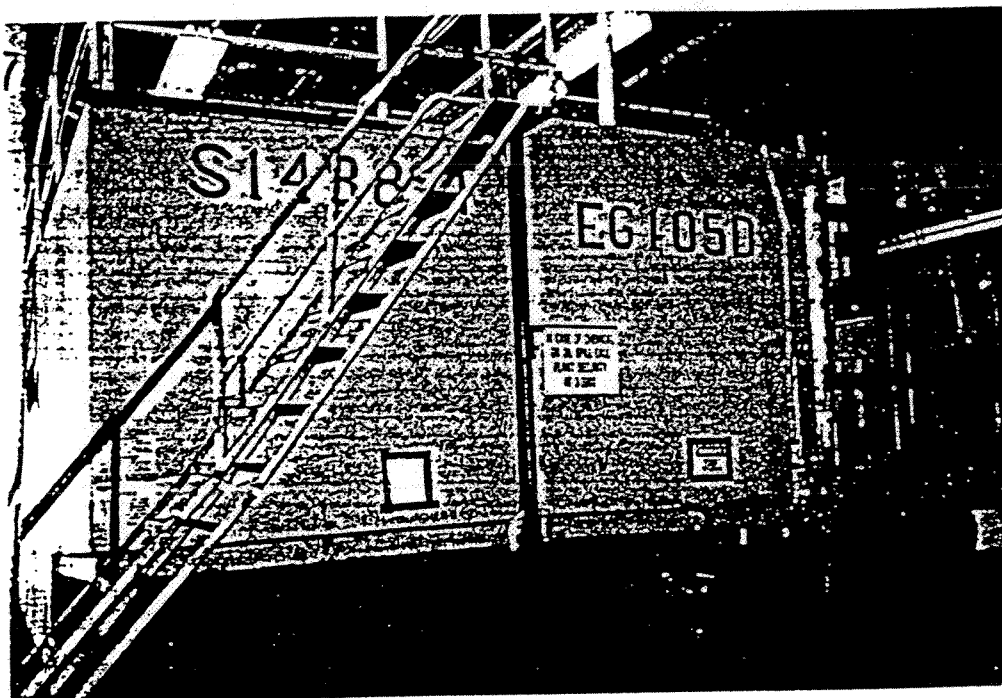
Description: Satellite Accumulation Area (SWMU 4) drums in General Stores portion of the basement of Building 44. The red drum (near) is used for the temporary storage of waste aerosol cans and the black drum (far) is used to store waste batteries.



Report Photograph No.: 7
Logbook Photograph No.: 1-6
Date: July 7, 1998

Time: 1027
Direction: North

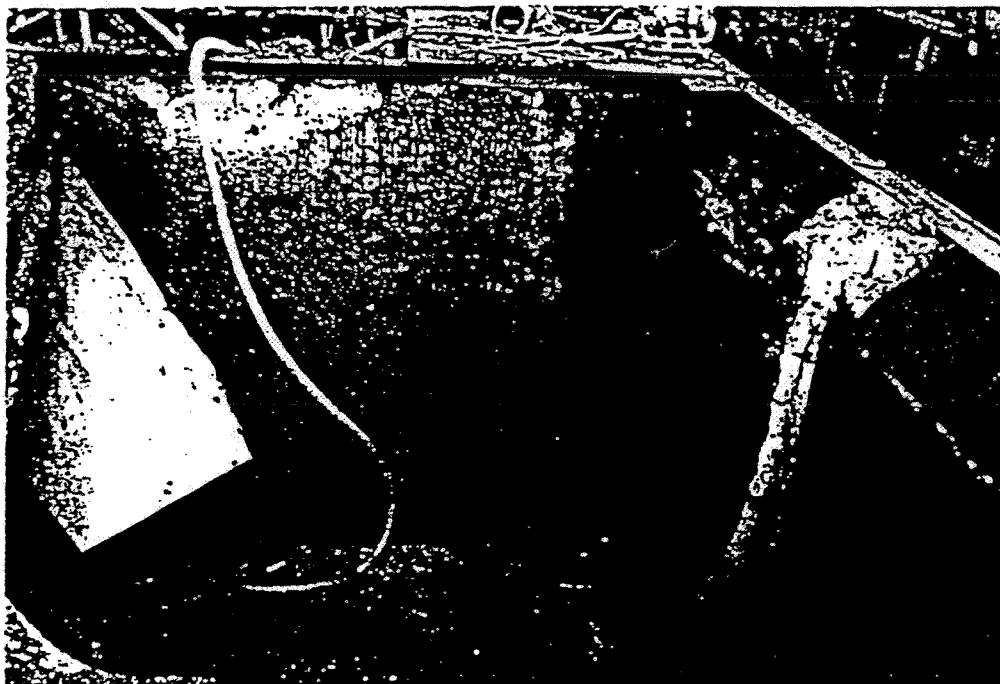
Description: Current Hazardous Waste Storage Area (SWMU 5) located in the northwest portion of Building 66.



Report Photograph No.: 9
Logbook Photograph No.: 1-1
Date: July 7, 1998

Time: 1005
Direction: North

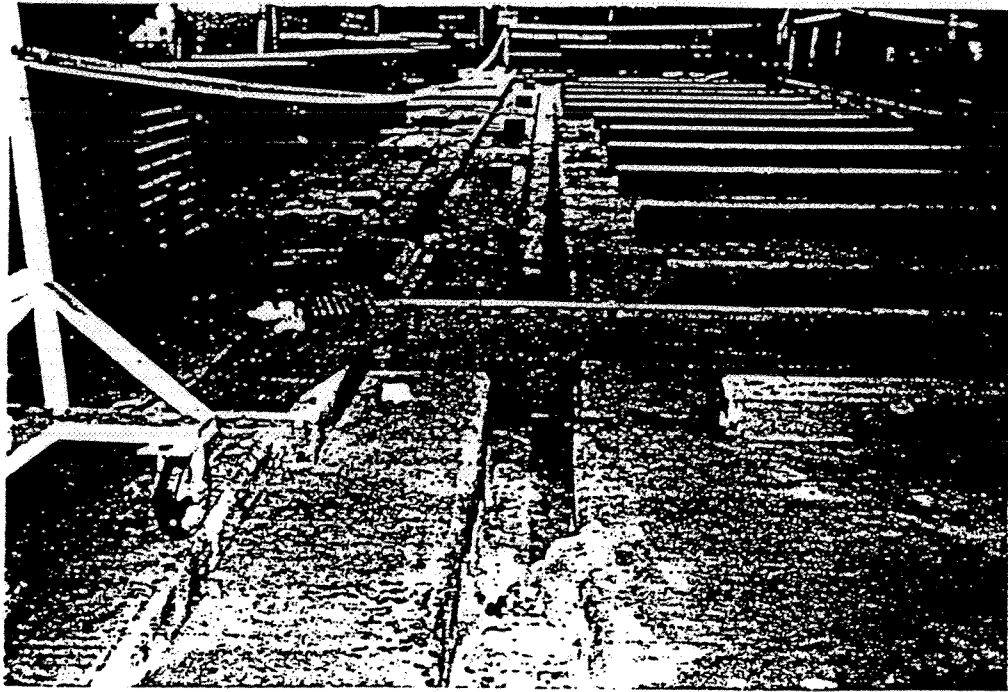
Description: View of the two 20,000 gallon Wastewater Storage Tanks (SWMU 6) located in the northwest corner of Building 44. The tank on the left handles the facility's wastewater. The tank on the right is present to manage overflow. The facility currently plans to remove the tank on the right from the site in August 1998.



Report Photograph No.: 11
Logbook Photograph No.: 1-11a
Date: July 7, 1998

Time: 1103
Direction: South

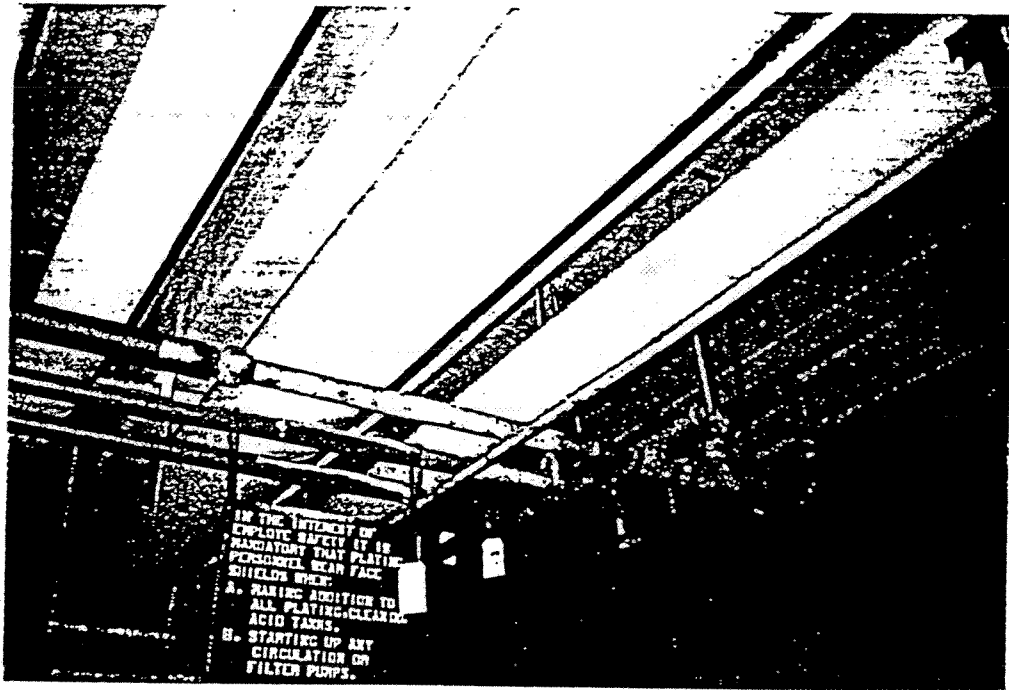
Description: View into one of the five concrete bins that comprise the Scrap Metal Storage Area (SWMU 8) in Building 63.



Report Photograph No.: 13
Logbook Photograph No.: 1-16
Date: July 7, 1998

Time: 1227
Direction: South

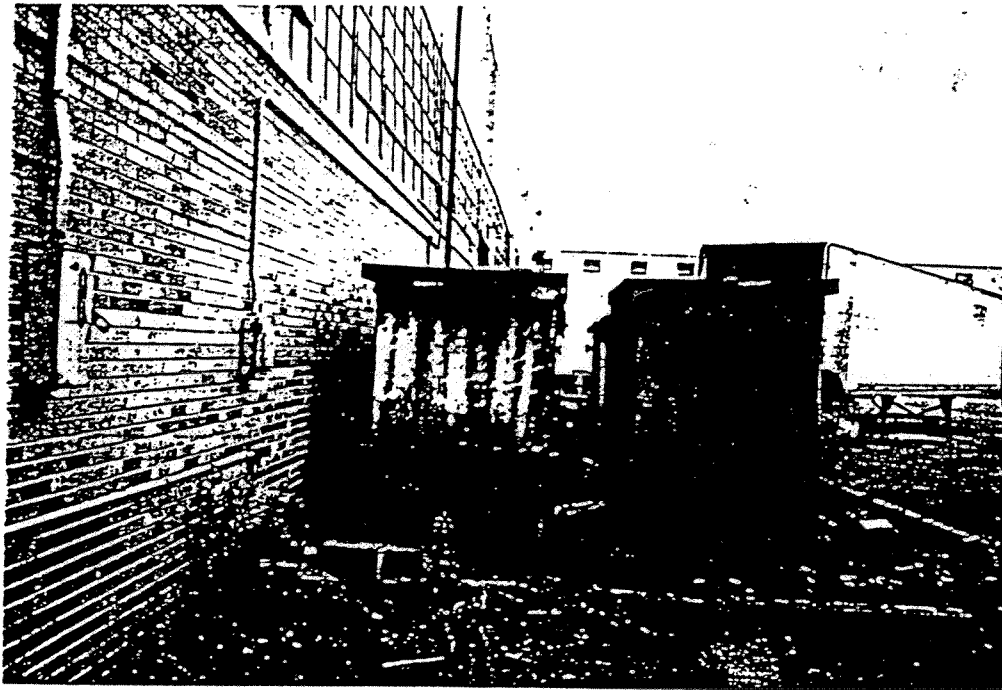
Description: View of the concrete platforms and sump associated with the zinc barrel plater (a portion of SWMU 9 - Former Plating Areas) in the southern portion of Building 44.



Report Photograph No.: 15
Logbook Photograph No.: 1-15
Date: July 7, 1998

Time: 1150
Direction: Up

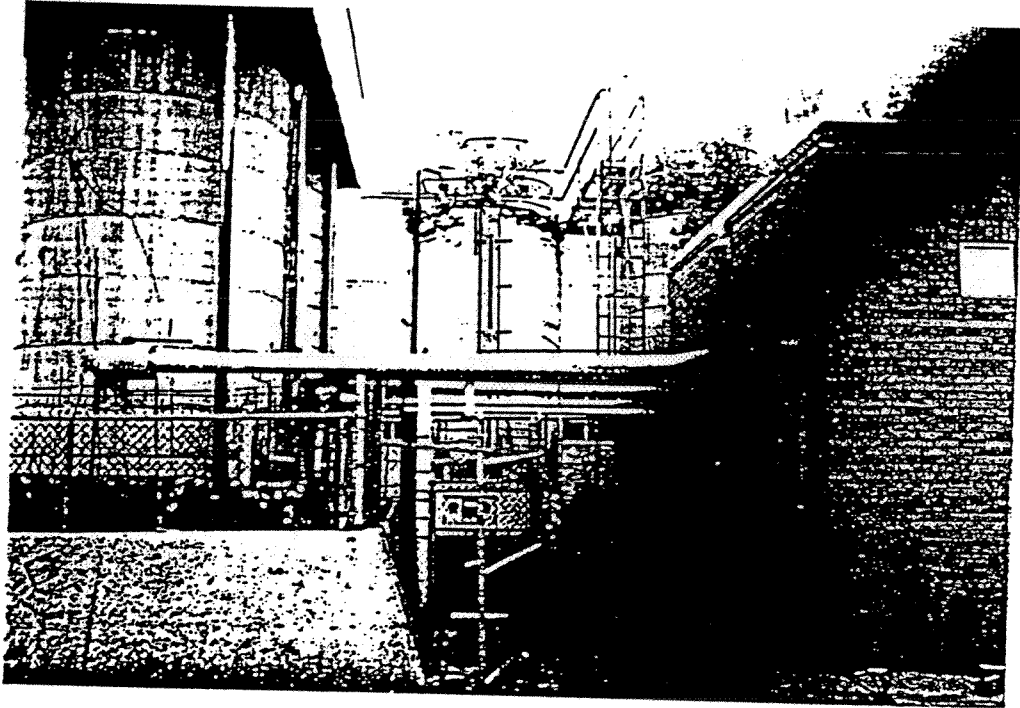
Description: Overhead Waste Pipes (SWMU 10) near former spent plating solution collection area (a component of SWMU 9 - Former Plating AREAS). The orange pipes are color coded to indicate that they were used to manage waste. Several of the pipes in the photograph may appear to have been cut and capped.



Report Photograph No.: 17
Logbook Photograph No.: 1-3
Date: July 7, 1998

Time: 1020
Direction: West

Description: A view of two of the 11 Caustic Tanks (AOC B) located adjacent to the Former Drum Storage Area (SWMU 1).



Report Photograph No.: 19
Logbook Photograph No.: 1-12a
Date: July 7, 1998

Time: 1120
Direction: South

Description: View of reportedly decommissioned insulated adhesive storage tanks located east of Building 44.

APPENDIX B
VISUAL SITE INSPECTION FIELD NOTEBOOKS

Field Logbook
for

Peregrine U.S. Inc.
Elmer, Michigan
MR 000028743

by Steve Lewis
Technology Partners
750 N. St Paul
Suite 608
Dallas, Texas 75201

for
U.S. EPA
Region 5

Contract No: 68-WF-0006
Write Name: Mr. DAVEN

04 Perceigne, D.S. Flight, MT

3/30/98

Decision was made about inspection date. S. Couran asked Neil what the facility manufacturing 1/2 plant stands door & window hinges; the other 1/2 plant assembles door & window hinges. According to Mr. Sair, no painting, electroplating or chemical operations occur at the site. Do operate small amounts & solvents. Lab packs to PCB. If it just for G.M. Motors issues, Perceigne would be classified as a Small Quantity Generator, Mr. Sair cannot talk about G.M. issues.

Perceigne, D.S. Flight, MT

3/31/98

0915hr Tedham Rep S Couran calls Neil Sair at Perceigne. Get voice mail. S. Couran leaves message that inspection for 4/9/98 is still on and that we would meet him at PRO plus. If there was a problem to Call Steve.

To discuss up ~~transcripts~~ ~~Billings~~
 Paces. Just found some GIM.
 2 in electronic playing area
 , All waste lines from playing
 op. to W.W.C. Post
 30hrs S. Cowan reports DEO office
 in Merice. Proceed to Grand
 Rapids to pick up Mike Powers.
 30hrs Mr Powers informs S.C. that
 Progressive Ins. has been
 post paid in Detroit. He received
 a message from Tom in
 Chicago. Offices about GM
 called EAT W.W.C. Phillips
 about inspection. EAT W.W.C.
 decided to postpone inspection
 indefinitely. Will make a
 decision after Mike Powers

4/8/98

1600hrs
 S. Cowan calls Neil Saitz (Paces)
 to discuss wire inspect. had been
 post paid in Detroit. Mr. Saitz
 asked for reason. told GIM
 was talked to EAT. He was
 given Gerald Phillip (EAT W.W.C.)
 phone # if he had any questions
 or comments. page didn't show insp. pt
 Mr. Powers calls Tom in Chicago
 off. to verify. Tom post postponed.
 Irish was going to call Mr. Phillips
 Mr. Powers contacts Irish in Chic
 No answer from Mr. Phillips.
 Ins. Team informed that inspec
 was cancelled for 4/8/98...
 S. Cowan contacts Neil Saitz
 Person. Ins. Team wire inspection
 action postponed.

1705hrs

112

19/10/98

7/7/98

Uxite (mu was substituted)

Metal - Foundry in Sargham
Drawing Compounds -
General trash -

GM included plating waste

2 waste pile

1 HD Storage Shed

1 RCRA Drum Pad (GM)

Boiler blowdown goes to sanitary sewer

6000 gallons / month oily water

waste currently generated by

Perrigine (70% water 30% oil)

metdraw etc. metal working lubricants

animal feds

Process washer & Die washer

drain to sanitary sewer

satellite

1 Tool crib - Aerodol cans

1 Batteries - universal

19/10/98

1

7/11/18

7/7/98

16. Vehicle opened roll over

2 second hand d... (unclear)

1st... (unclear)

... (unclear)

... (unclear)

... (unclear)

... (unclear)

... (unclear)

... (unclear)

... (unclear)

... (unclear)

... (unclear)

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... (unclear)

... (unclear)

... (unclear)

... (unclear)

... (unclear)

... (unclear)

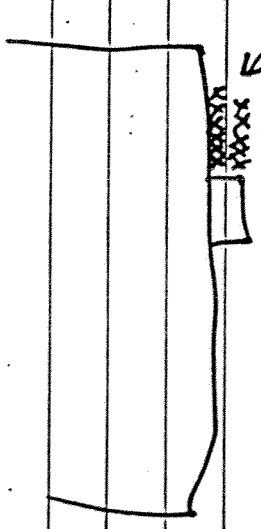
Lids covering the tanks

and they were empty, even

the one that was open,

suggesting a leak on bottom.

... (unclear)



Has Duster

Storage Superior or Metro take the

BBG 66 waste off site

Lab packs & clean-outs

etc if someone wants to throw

away old paint etc.

500 lbs per month ball par

cleaning out old rooms.

Waste Pile from consent order.

Coal scattered on ground,

near land fill. NW called 'B'

small spot 2' x 2' of metallic

slag-like waste, maybe unrefined

SP15 7/7/98

Spencer list of items

Wiping area

Adhesive tank (M) residue

Yellow base oil

used water tank almost full

from paint shop residue, mostly white

Shore road tank 2 in

(sand-paint) base operation

Mobile garage and in shop

unpleasant of basement

found existing drainage in driveway

Yellow box on street

is mostly seen in summer

garage with strong with debris

Mobile site runs in 1980s

with see off site, hydrocarbons

rows separate from garage

Mobile site in road, paint

SP15 7/7/98 2

Paint room

2 drums copper scrap

no waste storage

Just housekeeping wastes

some small cracks on floor

no floor drains sloped toward

garage doors on south end of

Blg no photos

housekeeping waste was consolidated

stored at the waste storage

area and 5 drums were

removed by Superior.

Adhesive storage tanks

7 4' x 5,000 gallon insulated

tanks, concrete sump for

secondary containment

There were 8 one has been

removed. Stainless steel concrete

insulation material residue in

sump and on surfaces surrounding

tanks Sump in SW corner

Permeator does not pump out

evaporation only, all pipes are

cut.

24 7/7/98

August 1998

Scrap metal

2. Long metal pipes
Pipes in electric plant
Part of furnace and others

op. metal, roofing, iron, steel

flow from room of dirt
also oil, grease, etc. in room
(2 tall, 2, maybe 3) 2000

at least 2000
at least 2000

more happens if

nothing found at foot of tank
nothing going on all night at foot

oil, gas, etc. from tank

TK

7/7/98

2

Acid Plating tank NE of post F-30, sign over 2ndary containment area states

"... it is mandatory that all plating personnel wear face shields"

concrete construction, it appears that a 5 foot x 5 foot plating tank (now filled w/ concrete) was located here (charlotte will take photo of pipes (color coded orange were for handling of waste))

Basement is posts 25 to 30 (maybe to 32)

Former rest treating area
no wastes generated

Zinc Barrel plates

11 Scrap metal Sumps collect

run on 1 hour



JOB BOOK

FROM PENINSULAR PUBLISHING

PROJECT NAME PEREGRINE INC

PROJECT NUMBER _____

CREW T. Quillen & C. Bouland

DATE 7 July 98 BOOK # _____ OF _____

WEATHER Overcast wet humid
mid 80's expected high

FIELD BOOK

16 PAGE

8 LEAVES

50% RAG

IF FOUND PLEASE RETURN TO:

NAME Carroll Bouland

COMPANY TechnLaw Inc

STREET 201 N. Wacker, Ste. 1100

CITY Chicago STATE IL ZIP 60607

PHONE 312-345-8912

0835 Arrive onsite Walk through the main bldg.

0855 In a conference room, exchange cards, He's procedures introductions, plan of VST. Acquired 1/97, GM owned & operated prior to that. Requested all photos (copy). According to Lynch, no woods from the two SWHUs in P's property has been moved to GM's property since Pharo owned the property. P. manufacturing door hinge & window regulators spot welding, but no painting machining onsite. Primarily metal stamping. Bldg. 2 mill sq. ft. Don't know P's acreage. Vacant land prior to GM. Bob estimates from the 1950s; would need to look it up.

- Security: 24hr.; fenced
- Operations: Bob would need to check but playing, parts cleaning, stamping & assembly.

CM Zuhne

Plating → chrome, Cu, Zn. GM used in 1992. Bob didn't know which one was more prevalent. Bill, Vides, said Ultra Lite Line (manufactured) He never saw the waste piles (been here since 1993). P. uses 1 area as a mill off box area (southern one of the two suspected waste piles). A Stebens Sagana mentioned metal parts. Recycling in Indianapolis for animal spread (growing crop) → general trash (no burning). A SWHU's to visit:

- 1) 2 waste piles
- 2) H₂ waste shed
- 3) RCRA dump pad (P. does not had not used it).
- 4) Surplus → overhead piping → tanks that are emptied & disposed. GM had it go to the waste water treatment plant. Only have stormwater drains that go to POTW. Have plans + Metrics of disposal.

- * Generate less than 4,000 oily wastewater. Redid piping, 70% HDPE

CM Boy Sho

the sump. Water in sump. Pipes cut off. Old electrical stuff. Construction was concrete. One monitoring well near sump @ 10 feet north of 28 fences wide (Charlotte) and A7 parcel boundary. Bob will provide closure plan. MUG data in there. Another MW @ 5-6' north of other MW.
 1017 Photo 2: South sump, High waste pads 2 MWs.
 1020 Photo 6 Caustic tanks w/ piping & valves photo 3 West tank heads" Lock out caustic Tank Draw blue Bay E-34 2nd Floor Bay working on Tank Lines"
 1022 Asphalt on concrete over pad area. Photo 4 SW to other end sump
 1025 Edge. 66' -> light ballasts in wooden boxes. Labeled ones w/ gates for haz material to be packaged for shipping but not haz waste. Show at the facility. Oct. set
 1027 Photos: New gated storage area " 6' N 8' "

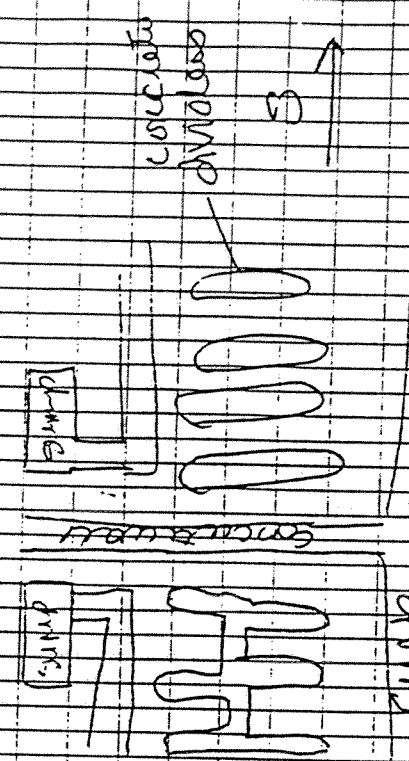
CHG 6/20

July 10

1031 West, Bay 66 photo 7
 1035 MW (8-9) in main RE. old power plant w/ 4 feet of an old coal pile. Ground leading to this area is uneven w/ metal screeds & fill. Area used for coal storage for the Power plant. About 20 ft north found metal paint like chips near on black coal. All caused by caustic spill.
 1040 Photo 8'S Coal Old waste pile former area MW (B-9)
 1042 David got address that this 117.3 acres (P's property).
 1045 Railway across the fly ash for disposal (likely only generated in 1980's) 2 10' boxes w/ 10' in back (parked).
 1050 Nonhaz soil, survey, disposal. Sump exists sanitary concrete in poor condition. Nonhaz. Located photo 9 S to SE.
 1051 Quite a bit of trash (food from animals) around.

CHG 6/20

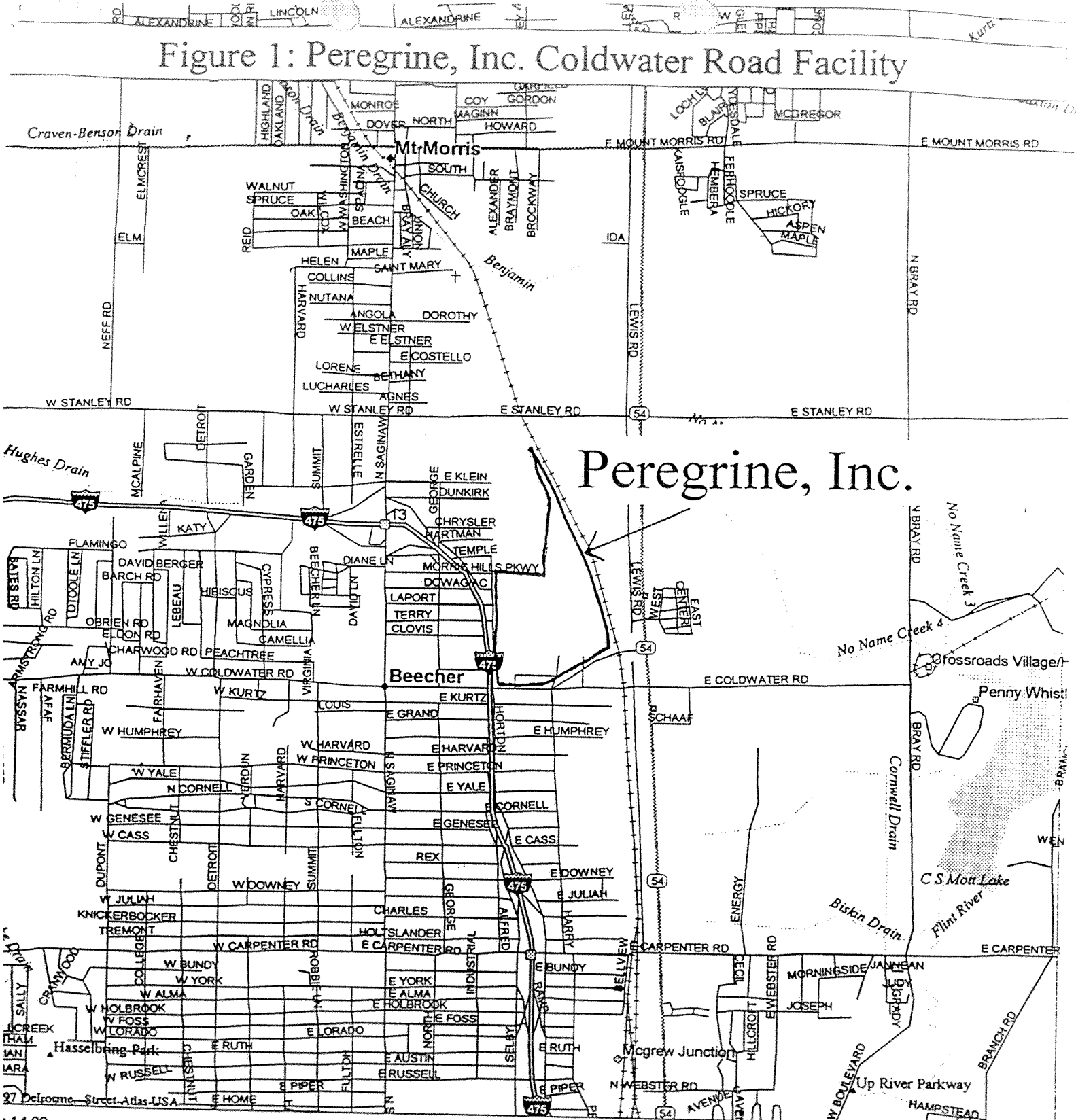
1125 Return to inside main bldg. —
 1132 ~~See 1130~~ Basement, 1 sump drain noted. Satellite area: 1140 55- sal. drum has waste Caerosol. Wentery's Door. Black area w/ hot- lines. Dog a calcium + Phacid. Neil says that they to separated.
 1139 Photo 13 South of 2 drums —
 1145 Photo 14 Nest of former plating area used by GH. Signal bulb spray to wear a case shield action
 "A. Heavy additional all plating cleaning acid tanks
 B. Stand up any circulation in the ponds."
 Liquid noted in bottom. Lots of orange (waste pipe) drain pipes overhead.
 These pipes have cut end some the area as well as one blue one the one blue is chimney 2. —
 1150 Overhead ppy East Photo 15 Concrete pad in dump corner called in a square overhead part of the area. Metal corner visible.
 CN Bonding

1153 Orange lines become regular lines near the break area. What is the flow direction? GH says it's the same. At one time, the plant had 9,000 employees. Heat treat area. Only minimally running. There is a set of valves to did.
 1227 Photo 16 → S. Zone camel plating area w/ sump.


1231 Sump + conveyor belt system not used dumped into sump (GH says) it is dumped out.
 1235 Plant is in shutdown mode. Greeny area for 2 weeks in July. GH says GH had checked the plant to
 CN Bonding

APPENDIX C
SITE LOCATION,
FACILITY LAYOUT, AND SWMU AND AOC LOCATIONS

Figure 1: Peregrine, Inc. Coldwater Road Facility



Peregrine, Inc.

14.00
 Aug 11 16:38 1998
 Scale 1:31,250 (at center)
 100 Feet
 300 Meters

- Local Road
- ▬ Interstate/Limited Access
- ⋯ Major Connector
- ⋯ State Route
- ▣ Exit
- +— Railroad
- ▣ Point of Interest
- ◆ Small Town
- ▲ Park/Reservation
- ◊ Locale
- + Cemetery
- ▨ Water
- ⋯ River/Canal

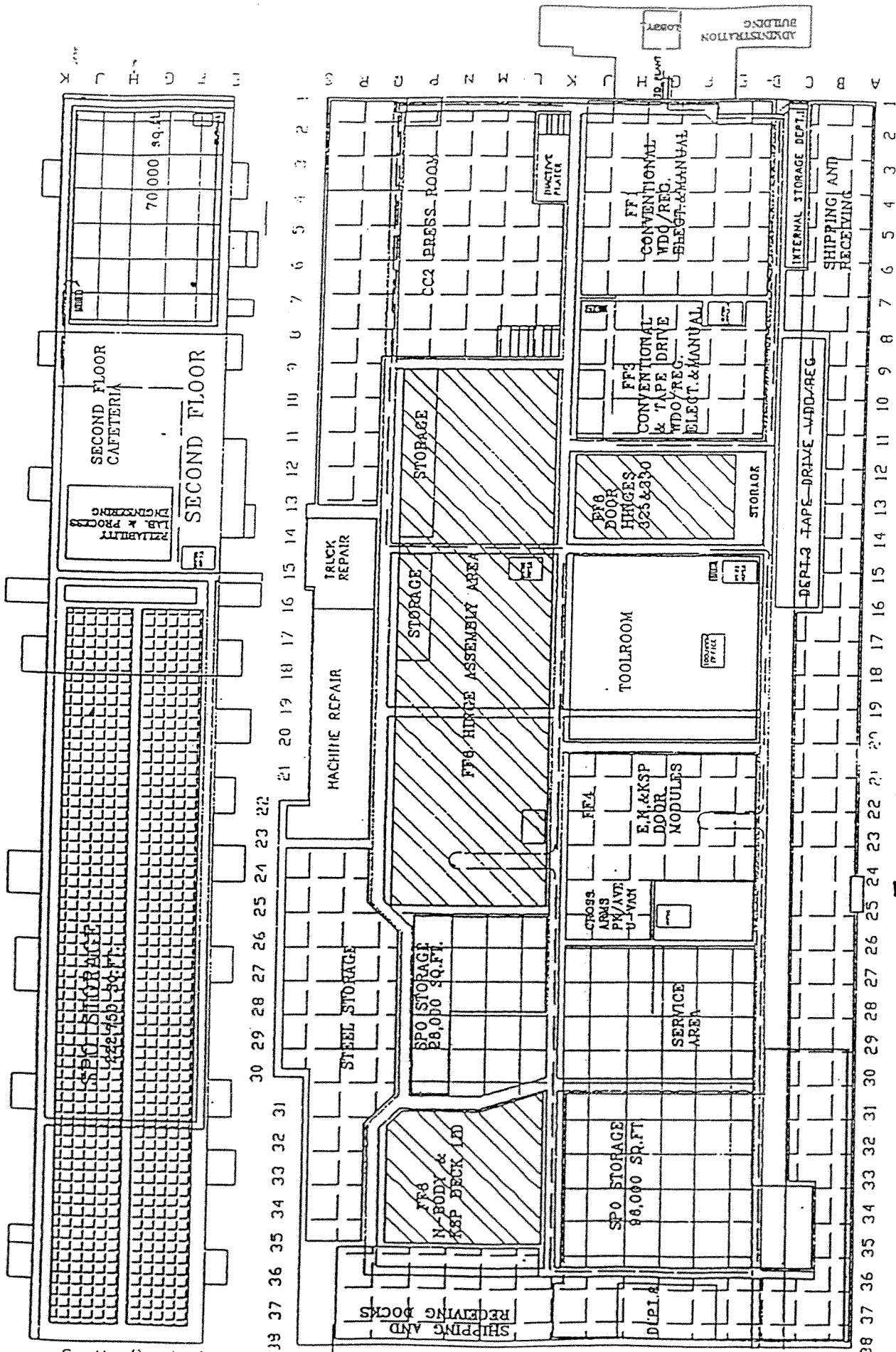
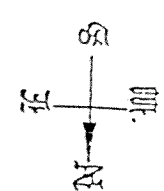


Figure 3
 PEREGRINE, INC
 FLINT OPERATIONS



BLDG 83	40.00
BLDG 44	416.75
TOTAL SPO STORAGE	456.75

