Request

- A statement that Veloz Carter is not responsible for the June 2008 CAP.
- Reform the CAO to remove Veloz Carter.

EXHIBIT R

CG

Charity M. Gilbreth
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File No. 026647-0003

November 24, 2008

VIA FEDERAL EXPRESS

California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, California 92501-3348

Attention: Kurt Berchtold, Assistant Executive Officer
Ken Williams, Chief of Pollutant Investigations
Rose Scott, Engineering Geologist, UST Section

Re: **Cleanup and Abatement Order No. 90-126 Issued in 1990 for the Property Located at 671 West 17th Street in Costa Mesa**

Dear Mr. Berchtold, Mr. Williams and Ms. Scott:

We appreciated the opportunity to meet with you on November 3, 2008, regarding the property located at 671 West 17th Street in Costa Mesa ("Property"), and Cleanup and Abatement Order No. 90-126 (the "Order") associated therewith. As we discussed, recent developments make it apparent that the agency should take action on this issue.

We understand that the agency is considering three options with respect to the Order: (1) rescind the Order; (2) amend the Order, or issue a new order, adding or changing parties; or (3) a combination of the above. We are pleased that the agency is considering these options, and formally request that the agency rescind the Order for the reasons we discussed on November 3 and those discussed more fully herein.

As you may recall, we discussed the 1990 Petition to the State Board regarding the Order and the fact that the Petition was dismissed. We agreed that currently there is no "actual dispute" regarding this matter, and that as a result the 30-day time limit to file a new petition, referenced in the letter from the State Board attached as Exhibit A, has not been triggered. As we explained, we look forward to a consensual resolution of this matter so that no further petition is necessary.

At the conclusion of our meeting, you requested additional information regarding: (1) the corporate history of J.C. Carter Company, Inc., the entity named on the eighteen-year-old Order;

and (2) the historical use of TCE, PCE and TCA at the Property. This submission is made in an effort to address your questions on these issues. The following points are of particular relevance:

- The J.C. Carter Company, Inc. named in the 1990 Order no longer exists by that name (if it exists at all), is not a current owner or operator at the site, and was sold by management associated with our client in 1997.
- Several separate and distinct corporate entities used the name "J.C. Carter Company" or "J.C. Carter Company, Inc." over more than fifty years, most of which were not affiliated with our client in any way;
- Mr. Veloz and other shareholders created a new corporate entity in connection with an asset purchase in 1987, which included the purchase of the underlying real estate;
- In connection with the asset purchase, the new corporate entity did not assume liabilities for the environmental contamination at the Property that occurred prior to the closing in 1987; and
- Three former employees, a Chemical Use and History Report for the Property, and the agency-approved Corrective Action Plan confirm that use of TCE, PCE, and TCA at the Property ceased prior to the period of time when our clients were shareholders to a company operating at the Property.

For all of the reasons, as discussed in detail below, the eighteen-year-old Order is an anachronism and should be rescinded.

I. BACKGROUND

The Order was issued on October 3, 1990, naming "J.C. Carter Company, Inc." as the responsible party. At the time of the Order, J.C. Carter Company, Inc. was the property owner. No other entities or individuals were named in the Order. Our client, Robert Veloz, is involved with this matter solely by virtue of the fact that he was the executive and majority shareholder of J.C. Carter Company, Inc. (hereinafter "Veloz Carter") at the time of the Order – not as a named party.

As we explained during the November 3 meeting, Veloz Carter did not use TCE at the Property; thus, the Order does not name any party that discharged or released TCE at the site. In the spirit of cooperation, acting as a good corporate citizen, Veloz Carter installed monitoring wells at the Property and attempted to work with the agency over several years to address the Order, including submissions to the agency in an attempt to reform the Order, the last of which was a Petition to Stay and Vacate and/or Amend the Order dated August 11, 2000. No written response was received to the 2000 petition.

This summer, on August 8, 2008, Mr. Veloz received a letter from Ms. Scott regarding a Corrective Action Plan for the Property, prepared on behalf of Seventeenth Street Realty LLC in connection with its efforts to convert the use of the Property from industrial to mixed use residential. The August 8 letter states that the Board recognizes "J.C. Carter Company, Inc." as the named responsible party for cleanup at the Property. As we discussed, this recent development makes it clear that the agency should take action to retire the Order.

In order to facilitate a resolution of this matter, in response to your request, we submit the following information about the corporate history and chemical use at the Property.

II. CORPORATE HISTORY OF J.C. CARTER COMPANY, INC. AND THE PROPERTY

A. Prior To 1987, Pre-Veloz Carter, Three Companies Used The J.C. Carter Name But Were Separate And Distinct Legal Entities.

Prior to the existence of Veloz Carter in 1987, three distinct corporate entities owned the Property and operated using the names The J.C. Carter Company, J.C. Carter Company, and J.C. Carter Company, Inc.

1. The Original J.C. Carter Company (1953-1973)

The original J.C. Carter Company, "The J.C. Carter Company," was founded by its namesake and purchased the Property in or around 1953 ("Original Carter"). The company designed and manufactured centrifugal pumps, control valves, fluid control components, and other specialized products for both commercial and defense use. In January 1973, the Original Carter was acquired by International Telephone and Telegraph Industries ("ITT"), an international conglomerate.

2. ITT Carter (1973-1983)

ITT maintained the business at the Property from 1973 – 1983, and operated "J.C. Carter Company" as an unincorporated division of ITT ("ITT Carter"). ITT is currently an active corporation, incorporated under the laws of New York. The focus of ITT Carter's business was cryogenic pumps. In 1983, ITT sold its J.C. Carter Company division to Armatron International, Inc. ("Armatron.")

3. Armatron Carter (1983-1987)

Armatron incorporated the company and held it as a wholly-owned subsidiary called "J.C. Carter Company, Inc." ("Armatron Carter"). The Property was held by Armatron Carter. According to documents available on the Massachusetts Secretary of the Commonwealth, Corporation Division website, Armatron International, Inc. merged with Armatron Merger Corporation on November 2, 1999, resulting in a privately-owned corporation. Armatron International, Inc. still carries on business in Massachusetts through its Flowtron Outdoor Products Division. Charles Housman is the current President and Chairman of the Board.

B. Veloz Carter (1987-1997) Was A New Corporate Entity That Purchased The Assets of Armatron Carter.

In 1986, an entirely new and distinct entity called "JCC Acquisition Corporation" was formed for the purpose of effectuating a transfer of assets from Armatron Carter to the new Veloz Carter. *See* Order at 1, ¶1. An Asset Purchase Agreement was entered into between

Armatron and JCC Acquisition Corp. (*see* relevant pages at Ex. 2); in January 1987, Robert Veloz became the majority shareholder in Veloz Carter. Immediately following the closing of the transaction, JCC Acquisition Corp. filed a certificate of amendment of its articles of incorporation changing its corporate name to "J.C. Carter Company, Inc.," referred to herein as Veloz Carter.

Veloz Carter is not a "mere continuation" of ITT Carter and Armatron Carter, as evidenced in part by the arms-length asset purchase for millions of dollars. While Veloz Carter shares the same name with Armatron Carter, and a similar name with ITT Carter, Veloz Carter is a separate corporate entity under California law which first commended operations in 1987 and is entitled to be treated as such. Further, while this submittal is largely factual, we do wish to comment on the legal significance of the fact that Veloz Carter took the assets and not the liabilities of Armatron. Specifically, Veloz Carter purchased the assets of Armatron Carter, and expressly excluded from the transaction liabilities for certain acts occurring prior to the closing in. *See e.g. Ray v. Alad Corp.*, (1977) 19 Cal. 3d 22, 28 (the buyer in an asset purchase transaction is not generally liable for the liabilities or debts of the seller). As a result, Veloz Carter is not liable for environmental contamination occurring at the Property prior to 1987.

C. Post Veloz Carter Property Owners.

1. Argo-Tech Acquired Veloz Carter in 1997.

In 1997, J.C. Carter Company, Inc. was sold outright to Argo-Tech Corporation through a Stock Purchase Agreement. Pursuant to this Agreement, Argo-Tech acquired J.C. Carter Company, Inc. and all of its assets and liabilities. Argo-Tech held "J.C. Carter Company, Inc." as a wholly-owned subsidiary ("Argo-Tech Carter"), until changing the company's name to "Argo-Tech Corporation Costa Mesa" on October 9, 2001. We believe that at some point thereafter, Eaton Corporation acquired all aspects of the business except the cryogenic pump division and the Property.

2. Seventeenth Street Is The Current Property Owner.

In July 2007, Argo-Tech transferred title of the Property to Seventeenth Street Realty, LLC ("Seventeenth Street"). Seventeenth Street is the current owner of the Property. Seventeenth Street has proposed a Corrective Action Plan in order to redevelop the Property for mixed-use residential buildings, as indicated in Ms. Scott's August 8 letter describing Seventeenth Street's request for Board approval of the cleanup plan in connection with "the property owner's desire to redevelop the site."

III. HISTORY OF TCE AND PCE AT THE PROPERTY

You indicated that you need to determine what, if any, work remains under the eighteen-year-old Order. As Mr. Veloz and his attorneys have explained on a number of occasions, Veloz Carter did not use the chemicals at issue and, therefore, there is no work remaining under the Order for which Veloz Carter is responsible. In an effort to further demonstrate that Veloz Carter did not use these chemicals, however, after the November 3 meeting we reviewed a number of records regarding this matter.

You had raised the issue of TCA. While there are three locations on the Property where TCA has been detected, there are no locations anywhere on the Property where TCA is greater than the Maximum Contaminant Level ("MCL"). Further, purchase orders indicate that the last time TCA was purchased at the facility was in January of 1986. Twenty gallons of TCA was purchased at that time, and would have been consumed by operations prior to the sale of the business in 1987. *See* Ex. 3 at 4. Regarding other constituents, while chemicals have been detected at the Property, all of these items are below the MCL. As a result, the only chemicals at issue are TCE and PCE, neither of which was used by Veloz Carter.

Since ITT Carter, Armatron Carter, and Veloz Carter conducted similar businesses, you asked what changed such that TCE and PCE were no longer used at the Property by Veloz Carter. The affidavits from three former employees that worked at the Property, from the time of ITT Carter through the time of Argo-Tech Carter, address the shift from TCE and PCE as a result of several business decisions. *See* Affidavit of David S. Beard, Ex. 4; Affidavit of Michael T. Petrozzi, Ex. 5; and Affidavit of Monroe F. Jameson, Ex. 6.

A. ITT Carter Used TCE and PCE To Clean Parts.

ITT Carter designed and manufactured cryogenic pumps for liquid natural gas. In the 1970s, there was also a demand for oxygen pumps for the aerospace industry, the steel industry, and other companies that needed to move oxygen. Several space programs, including the Titan I Intercontinental Ballistic Missile Project, required oxygen pumps for their rocket engines. As a result, during the days of ITT Carter, there was a high demand for oxygen pumps and ITT Carter designed and manufactured such pumps in addition to their cryogenic pumps. *See* Ex. 4 at ¶¶ 7-10; Ex. 5 at ¶¶ 5-8.

The oxygen pumps made by ITT Carter were distinct from the other pumps made at the Property because the oxygen pumps had residual hydrocarbons that needed to be cleaned before exposure to oxygen. The cleaning process for the oxygen pumps was labor intensive and time consuming. Such process was critical, however, because if the oxygen pumps were not cleaned properly there was a risk of explosion when exposed to contaminants such as grease. *Id.*

TCE and PCE were very efficient cleaning agents. According to the former employees, the primary use of TCE and PCE at the Property was to clean the oxygen pumps. After the oxygen pumps were cleaned, the TCE and PCE was placed in the steel container tank located in a concrete walled underground sump behind Building 9 (Ex. 4), in what is now the covered inspection staging area. The sump had a large manhole-size opening in the steel tank into which the TCE, PCE, used oil, and any other liquids that needed to be disposed were stored. TCE and PCE were also used on the Property to clean machine parts, such as ball bearings in the deburring area, because the chemicals were already at the Property to clean the oxygen pumps. *See* Ex. 4 at ¶¶11-14; Ex. 5 at ¶¶9-11; Ex. 6 at ¶¶7-8.

B. **We Are Not Presently Aware of Use Of TCE And PCE At The Property after Circa 1979.**

As described by the former employees, at least four factors led the pre-Veloz Carter entities to discontinue using TCE and PCE at the Property.

First, the demand for oxygen pumps decreased in the late 1970's as the air force and NASA space programs changed course. Specifically, Titan I came to an end and was replaced by Titan II and III, which did not use oxygen as a propellant. As a result, there was a diminished demand for oxygen pumps and the business shifted its focus to other shaft seal pumps which used argon, nitrogen, and hydrazine. TCE and PCE were not used to clean these other fuel pumps. *See* Ex. 4 at ¶16; Ex. 5 at ¶13.

Second, the use of TCE and PCE was discouraged in the industry as people began to learn more about these chemicals. *See* Ex. 4 at ¶17; Ex. 5 at ¶15.

Third, given the decrease in sales of the oxygen pumps, it was no longer profitable to clean the pumps on site given the labor intensive cleaning process. *See* Ex. 4 at ¶18; Ex. 5 at ¶14.

Fourth, the company learned and appreciated the safety risks involved if the oxygen pumps were not cleaned property. *See* Ex. 4 at ¶19; Ex. 5 at ¶16.

As a result, a business decision was made to instead send the oxygen pumps off site to be cleaned. Sometime between 1978 and 1979, ITT Carter started sending the oxygen pumps off site to be cleaned by Wyle Company. By 1980, the cleaning room where TCE and PCE had been used on the oxygen pumps had been shut down and converted into new office buildings. Since TCE and PCE were primarily used at the Property to clean the oxygen pumps, when they stopped cleaning the oxygen pumps on site they also stopped using TCE and PCE to clean other machine parts. *See* Ex. 4 at ¶¶20-22; Ex. 5 at ¶ ¶17-19.

Eventually, in March 1986, during the Armatron Carter era, the 500-gallon underground storage tank located behind Building 9 was removed, revealing localized soil contamination and leakage. Once the UST was removed, all chemicals were disposed of in steel drums, later sealed and collected by an outside vendor and taken off site. *See* Ex. 4 at ¶23; Ex. 5 at ¶20.

C. **Veloz Carter Did Not Use TCE Or PCE At The Property.**

As attested to by all three former employees, TCE and PCE were not used, and in fact were not even present, at the Property during the Veloz Carter era. *See* Ex. 4 at ¶¶24-25; Ex. 5 at ¶21; Ex. 6 at ¶10. In fact, Veloz Carter sold the oxygen pump portion of the business shortly after the Asset Purchase.

The Chemical Use and History Report for the Property, prepared by Delta Environmental Consultants, Inc. on December 1, 1990, further confirms that TCE, PCE, and TCA were not present or used at the Property during the Veloz Carter era (the "Delta Report"). *See* Ex 3 at 2-3. The Delta Report reviewed the use, storage, and disposal practice of Veloz Carter, reconstructed

from purchase orders dating back to 1985 and hazardous waste manifests, for petroleum and other volatile hydrocarbon and halogenated hydrocarbon compounds. According to Delta, "TCA was used once at the facility as a cleaning fluid. TCA has not been used or stored at the facility since 1986." Ex. 3 at 3. Further, Delta found that:

> "According to the purchase records maintained by the present owners, which are available through 1985 only ... **TCE and PCE have never been used at the site** [during the Veloz Carter ownership]. Both the fact that the underground waste oil tank was removed before the [then] present owners of the company [Veloz Carter] controlled the site, and the fact that there is no evidence whatsoever that TCE and PCE have ever been used at the site, indicates that, even if the site were considered a source of the constituents found in the underlying groundwater the current owners and operators of the site [Veloz Carter] are not the appropriate responsible parties." Ex. 3 at 2. (emphasis added)

The June 28, 2008 Tetra Tech Corrective Action Plan, approved by the agency, cites to Delta's finding that TCE and PCE were not used at the Property since at least 1985. *See* CAP at p. 3. The CAP also acknowledges that TCA was used for cleaning parts in small quantities only through 1986. *See* CAP at p. 3.

Veloz Carter funded hundreds of thousands of dollars of investigations at the Property in cooperating with the agency's requests. While TCE and PCE were discovered in soil and groundwater during these investigations, Veloz Carter was not a discharger and never used those chemicals in its operations. In contrast, it is clear that ITT actively used TCE and PCE at the Property in its operations during the period from 1973-1979. To the extent the agency is seeking responsible parties, it certainly should be looking to ITT, and others that it may name pursuant to its statutory authorities. What is apparent is that Veloz Carter should not be a named party under these authorities, and should not be subject to any continuing directives from the agency.

Should you have any questions about this submission, or other issues related to the Property, you can reach me at (714) 755-8143 or Paul Singarella at (714) 755-8168.

Very truly yours,

Charity M. Gilbreth

Charity M. Gilbreth

Enclosures

bcc: *via email (enclosures sent via U.S. mail)*
Robert Veloz

bbcc: *via email without enclosures*
Paul Singarella, Esq.
Tom Edwards, Esq.

Exhibit 1

STATE OF CALIFORNIA - CALIFORNIA ENVIRONMENTAL PROTECTION AGENCY
STATE WATER RESOURCES CONTROL BOARD
PAUL R. BONDERSON BUILDING
901 P STREET
P.O. BOX 100
SACRAMENTO, CALIFORNIA 95812-0100
(916) 657-0406
FAX: (916) 653-0428

PETE WILSON, Governor

JAN 14 1993

Ms. Diane R. Smith
Snell & Wilmer
P.O. Box 19601
1920 Main Street, Suite 1200
Irvine, CA 92714

Dear Ms. Smith:

IN THE MATTER OF THE PETITION OF J.C. CARTER COMPANY, INC. FOR REVIEW OF CLEANUP AND ABATEMENT ORDER NO. 90-126 OF THE CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, SANTA ANA REGION. OUR FILE NO. A-709.

As I indicated to you in my letter of November 14, 1990 enclosed, the State Water Resources Control Board (State Water Board) will not hold petitions indefinitely. As this petition has been on file with the State Water Board for more than two years and it has been more than one year since I notified you of the State Water Board's policy regarding dismissing old petitions, it is considered dismissed.

This file will be closed as of today. If, in the future, an actual dispute arises between you and the Regional Water Quality Control Board over the interpretation or enforcement of the underlying order, you may file a new petition with the State Water Board within 30 days of the date the new dispute arises. Any issues relevant to that dispute, including but not limited to those issues raised in this petition, may be considered at that time in the same manner as if the petition were filed for the first time.

If you have any questions about this decision or procedure, please call Ted Cobb, Senior Staff Counsel, at (916) 657-0406.

Sincerely,

Craig M. Wilson

Craig M. Wilson
Assistant Chief Counsel

cc: Mr. Gerard J. Thibeault, Executive Officer
California Regional Water Quality
Control Board, Santa Ana Region
2010 Iowa Avenue, Suite 100
Riverside, CA 92507

Enclosure

Exhibit 2

ASSET PURCHASE AGREEMENT

This Agreement, dated September 25, 1986, is by and among JCC Acquisition Corp., a California corporation ("Purchaser"), Armatron International, Inc., a Massachusetts corporation ("Armatron") and its wholly-owned subsidiary J.C. Carter Company, Inc., a California corporation ("Seller").

NOW, THEREFORE, Purchaser, Armatron and Seller hereby agree as follows:

ARTICLE I

DEFINITIONS

As used herein, the following terms shall have the following meanings:

1.1 Closing Balance Sheet. The term "Closing Balance Sheet" shall mean the balance sheet of Seller as of the Settlement Time (as defined in Section 1.4 hereof), which shall be prepared and determined in accordance with Section 3.3 hereof.

1.2 Closing Date. The "Closing Date" shall mean October 15, 1986 or as soon thereafter as the conditions to Closing set forth in Articles VII and VIII hereof are satisfied or waived.

1.3 Purchased Assets. The term "Purchased Assets" shall mean all of Seller's right, title and interest in and to properties, assets, and rights of any kind, whe-

disclosed, through no act or omission of Armatron or Seller, in a manner making it available to the general public.

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be duly executed on their respective behalf, by their respective officers, thereunto duly authorized, in multiple originals, all as of the day and year first above written.

JCC ACQUISITION CORP.
("Purchaser")

BY Harry S Derbyshire
HARRY S DERBYSHIRE
Its PRESIDENT

ARMATRON INTERNATIONAL, INC.
("Armatron")

BY Charles J. Hansen
Charles J. Hausman
Its Treasurer

J.C. CARTER COMPANY, INC.
("Seller")

BY Robert L. Velde
ROBERT L. VELDE
Its PRESIDENT

MEMORANDUM OF AGREEMENT

This Memorandum confirms the execution of the Asset Purchase Agreement among JCC Acquisition Corp., Armatron International, Inc. and J.C. Carter Company, Inc., prior to delivery of the Schedule to the Agreement. Terms used herein are defined in the Agreement.

Seller agrees to prepare and deliver the Schedules to Purchaser not later than the close of business on Friday, October 3, 1986. Meeting this deadline is important to Purchaser because the completed Schedules are needed in order to finalize the financing of the transaction contemplated by the Agreement.

Executed in San Diego, California on September 25, 1986.

JCC Acquisition Corp.

By
Its PRESIDENT

Armatron International, Inc.

By
Its Treasurer

J.C. Carter Company, Inc.

By
Its President

KMP-04M:04

Exhibit 3

Delta
Environmental Consultants, Inc.

3330 Data Drive, Suite 100
Rancho Cordova, CA 95670
916/638-2085
FAX: 916/638-8385

December 1, 1990

CONFIDENTIAL–ATTORNEY WORK PRODUCT

Ms. Nancy Martin
California Regional Water Quality Control Board,
Santa Ana Region
5809 Indiana Avenue, Suite 200
Riverside, California 92506

Subject: Chemical Use History
J. C. Carter Company, Inc.
671 West 17th Street, Costa Mesa, California
Delta Project No. 40-90-005

Dear Ms. Martin:

Enclosed is Delta Environmental Consultants, Inc., chemical use history report for the subject site. If you have any questions, please call me at (916) 638-2085.

Sincerely,

DELTA ENVIRONMENTAL CONSULTANTS, INC.

Scott Romine

Scott B. Romine
Chemical Engineer

SBR:mjd
Enclosure

cc/enc: Ms. Diane R. Smith, Esq., Shell & Wilmer, Irvine, California
Ms. Melodie Grace, Esq., J. C. Carter Company, Inc.

CHEMICAL USE AND DISPOSAL HISTORY

J. C. CARTER COMPANY, INC.
671 WEST 17TH STREET
COSTA MESA, CALIFORNIA
DELTA PROJECT NO. 40-90-005

RECEIVED
DEC 3 1990
CRWQCB
SANTA ANA - REGION 8

Delta
Environmental
Consultants, Inc.

CHEMICAL USE AND DISPOSAL HISTORY

J. C. CARTER COMPANY, INC.
671 WEST 17TH STREET
COSTA MESA, CALIFORNIA
DELTA PROJECT NO. 40-90-005

CHEMICAL USE AND DISPOSAL HISTORY

J. C. CARTER COMPANY, INC.
671 WEST 17TH STREET
COSTA MESA, CALIFORNIA
DELTA PROJECT NO. 40-90-005

Prepared by:

DELTA ENVIRONMENTAL CONSULTANTS, INC.
3330 Data Drive, Suite 100
Rancho Cordova, California 95670
(916) 638-2085

December 3, 1990

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CHEMICAL USE AND DISPOSAL HISTORY

J. C. CARTER COMPANY, INC.
671 WEST 17TH STREET
COSTA MESA, CALIFORNIA
DELTA PROJECT NO. 40-90-005

1.0 INTRODUCTION

This report was prepared by Delta Environmental Consultants, Inc. (Delta), for J. C. Carter Company, Inc. (J. C. Carter). J. C. Carter, and its consultants, have prepared this report based on information in its possession or made available to it since the issuance of the Board's order.

As is apparent from the text of the report, the information presently available may not be complete or comprehensive in every respect. J. C. Carter is continuing to gather additional data and records which may be in the possession of previous consultants, prior owners of the company, or public agencies. Please refer to the correspondence to same, all of which is attached to this report.

It was and continues to be J. C. Carter's hope that the expense of duplicating the efforts of prior consultants could be avoided by obtaining all prior files, records, and other documentation. It has not yet obtained access to or copies of previous working files despite repeated contacts with Hekemian, Converse and Schaefer-Dixon, but is continuing its efforts, and sees no present obstacle to those documents being made available in the very near future. Once all prior information is obtained J. C. Carter will update and supplement this report to reflect any new information obtained, or any additional analysis made possible by review of those documents.

If, despite J. C. Carter's efforts, it is unable to obtain access to such data to complete the site evaluation to the satisfaction of the Board, or if any newly obtained data requires updating for completeness, J. C. Carter will proceed to obtain any necessary information through its own efforts, so as to provide a complete and comprehensive analysis of the site's history, condition, and possible off-site sources of on-site impacts. Accordingly, J. C. Carter wishes to emphasize that this is a progress report which may be subject to modification in the future, and to assure the Board that J. C. Carter is continuing its efforts to meet the Board's schedules on a timely basis.

The purpose of this report is to describe the use, storage, and disposal practices for petroleum and other volatile hydrocarbon and halogenated hydrocarbon compounds used at the J. C. Carter facility. The information presented in this report was compiled from records available at the facility. Information regarding how compounds were used was gathered from interviews with J. C. Carter personnel. The present owners acquired the company January 22, 1987. Purchase orders are available back into 1985, and manifests are available from 1981. Documents relating to facility activities prior to 1981 have been requested from previous owners and consultants.

1.1 Site History/Background

The first buildings on the facility, Buildings 1, 2, and 3 (site map, Figure 1), were constructed in 1952. These buildings now house the machine shop, parts storage, and assembly rooms for parts manufactured at the facility. Building 2 also houses the Purchasing Department. Building 3 also houses the production control and operations offices. Buildings 4 through 7 were constructed in 1959. These buildings now house the facility's engineering offices, marketing, accounting, and data processing departments. Building 9 was constructed in 1973, and now contains an additional machine shop. Building 10 was constructed in 1976, and now houses the shipping department. Building 11 was constructed in 1978, and houses the I/M test area. Buildings 12 and 13 were also constructed in 1978. Building 12 houses the I/M assembly area and offices. Building 13 houses a test area. Building 8, housing the maintenance shop and office, was constructed in 1979.

J. C. Carter wishes to emphasize that the current owners of the J. C. Carter site purchased the assets of the J. C. Carter Company, Inc., which included the Costa Mesa facility, on January 22, 1987. (JCC Acquisition Corp. took over operation and maintenance of the facility on October 1, 1986, before the actual sale transaction closed.) The waste oil underground storage tank located on the south side of Building 9 was removed in March 1986, almost a year before the current owners took title to the property, and over 6 months before the current owners took over operation and maintenance of the facility.

According to the purchase order records maintained by the present owners, which are available through 1985 only, though earlier records have been requested from previous owners, TCE and PCE have never been used at the site. Both the fact that the underground waste oil tank was removed before the present owners of the company controlled the site, and the fact that there is no evidence whatsoever that TCE and PCE have ever been used at the site, indicates that, even if the site were considered a source of the constituents found in the underlying ground water (which J. C. Carter continues to maintain it is not) the current owners and operators of the site are not the appropriate responsible parties.

J. C. Carter respectfully requests that the previous owners of the company be named as the responsible parties, and required to provide the Board with any information necessary to meet the Board's requirements. The previous owners of J. C. Carter Company, Inc., were ITT Corporation, which owned the company from January 30, 1973 until September 30, 1983, and Armatron International, Inc., which owned the company from September 30, 1983, until the purchase of the assets by JCC Acquisition Corporation on January 22, 1987.

ITT Corporation's address is 320 Park Avenue, New York, New York 10022; Armatron's address is 2 Main Street, Melrose, Massachusetts 02176. Since receipt of information indicating a lack of purchase order documents prior to 1985 and manifests before 1981, J. C. Carter has requested prior records from the previous owners, but such information, if it is available, has not yet been received. This report will be updated when any significant

additional information is received. It may be necessary to request the Board's assistance in obtaining information from previous owners.

2.0 CHEMICAL USE HISTORY

J. C. Carter has used and now uses many compounds typical to metal machining and aviation testing. In the documents reviewed, the use of TCE or PCE has not been documented. The only documents that indicate the use of chemical compounds on site are purchase orders and hazardous waste manifests as noted above. The use, storage, and disposal practices of J. C. Carter, as reconstructed from purchase orders and hazardous waste manifests, are described below for petroleum and other volatile hydrocarbon and halogenated hydrocarbon compounds. Records for chemical purchases are tabulated in Appendix B. Records of hazardous waste manifests are contained in Appendix C. Both purchase orders and manifests are on file at J. C. Carter.

Most compounds listed below, except trichloroethane (TCA), are kept in stock at all times. Drums are stored in the drum storage area near Building 8 for dispensing compounds on an as-needed basis. Compounds that are purchased in small quantities (5-gallon cans or smaller) are stored in flame-proof cabinets on the east side of Building 11 or in flame-proof cabinets in Building 2, also for use by employees as needed. TCA was used once at the facility as a cleaning fluid. TCA has not been used or stored at the facility since 1986.

Drums containing waste products were kept in the area behind Building 9 in the vicinity of the former underground storage tank and chip bins. Delta has been unable to determine what practices were used for accumulating, storing, and disposing waste products prior to the construction of new buildings or the installation of the former storage tank. Documents of site storage and disposal practices prior to 1981 have been requested from previous owners.

A test area was constructed along with Buildings 12 and 13. This area was built with sloped floors and secondary containment trenches. Floor spills, cleanings, and rainwater collected in these trenches are pumped to aboveground storage tank located south of Building 14.

2.1 Aviation Fuel

Jet A aviation fuel is used to test pumps and valves manufactured at the facility. Jet A aviation fuel has been purchased in bulk quantities since 1985 according to available purchase orders. Additional records have been requested from previous owners.

On-site Jet A storage includes eight tanks in the aero test area south of Building 13. The largest tank capacity is 800 gallons; one is 700 gallons, and the rest are 500 gallons or less. Because of a varying product mix, the amount of Jet A fuel on hand is not constant. Maximum capacity in the area is 3,750 gallons. Testing is

conducted in closed loops - the Jet A fuel is recirculated. Replacement Jet A fuel is needed when the fuel becomes mixed with water from condensation in the tank. Use records indicate that Jet A aviation fuel lasts from 6 weeks to 3 months before replacement is necessary.

When the jet fuel becomes mixed with water, it is pumped to the aboveground storage tank south of Building 14 and removed by a licensed waste hauler.

2.2 Solvents

Purchase orders indicate that the last time TCA was purchased at the facility was in 1986. Twenty gallons of TCA were purchased on January 3, 1986, and delivered on January 8, 1986. TCA was used in the production of an in-line pump. The parts were cleaned with TCA as some of the pumps would ultimately be used with liquid oxygen. This portion of the business was sold in January 1987. Interviews with site personnel indicate that 20 gallons of TCA would have been consumed by operations prior to the sale of the business in 1987.

Stoddard solvent has been and is currently used on site to test aero valves and pumps. Other solvents used at the facility include compounds known as 140-66, Type I Fluid, Type II Fluid, isopropyl alcohol (IPA), and #600 solvent and acetone.

The compound known as 140-66 is a hydrocarbon mixture that is used for testing hydraulic equipment in the aero test area south of Building 13. Type I Fluid is 100 percent iso-octane, and Type II Fluid is 70 percent iso-octane and 30 percent toluene. Both were and are used as test fluids in the aero test area.

Isopropyl alcohol and #600 solvent, a 50/50 mixture of IPA and toluene, are both used as cleaning solvents in Buildings 12 and 13. Acetone is used for cleaning parts in the assembly areas in Buildings 2 and 12.

Solvents have been purchased in 1-gallon, 5-gallon, or 55-gallon containers, and in bulk. The 55-gallon containers are stored in the drum storage area near Building 8.

Stoddard solvent is used in parts testing. When the Stoddard solvent used in testing deviates from specification through heating and shearing, it is disposed. Waste Stoddard solvent used in testing is stored in the tank south of Building 14 for transfer to a recycling facility by a licensed hauler.

Stoddard solvent is also used in the parts washer between Buildings 1 and 9. The spent solvent was previously disposed of in the waste oil tank formerly located to the south of Building 9. The spent solvent from the parts washer is now pumped out of the parts washer for transfer to a recycling facility by a licensed hauler.

2.3 Oils

Several different oils have been and are now being used at the facility. Several types of oils have been used. They are machine lubricating oils, hydraulic fluids, motor oils, and cutting oils.

Machine lubricating oils used at the facility include Mobil DTE-24, DTE-26, DTE Light, VACTRA #2, and Velocite #6. Machine oils are nonvolatile hydrocarbon mixtures used for lubricating the moving parts in the machines. They are purchased in 55-gallon drums. The oil in the machines is replaced with clean oil at various intervals, and the used oil is stored in 55-gallon drums and recycled.

Hydraulic fluids, used to test hydraulic equipment produced at the facility, have included ATF Type 210, Vaculine 1405, and Aero H.F.A. Hydraulic fluids are also nonvolatile hydrocarbon mixtures. When the hydraulic fluids fail to meet testing specifications, they are stored in 55-gallon drums for disposal by a licensed waste hauler. Skydrol, a phosphate ester, is also used as a hydraulic test fluid.

Motor oils such as Dillo 10W are used for vehicle maintenance. For the past 3 years, only five forklifts have been serviced on site. The oil is changed quarterly. Used oil is placed in 55-gallon drums and is recycled. In the past, company vehicles were serviced on site and the same procedures were followed. This practice was discontinued 3 years ago.

Cutting oils used in the past are Cindol #3202 and Hocut 757. Cindol is composed of 30 to 60 percent mineral oil with 1 to 10 percent diethanolamine. Hocut 757, also known as Cindol 757, is 30 to 60 percent mineral oil with 1 to 10 percent p-chloro-m-cresol. Cindol and Hocut were purchased in bulk quantities (drums) as needed, and were stored in the drum storage area near Building 8 or Building 9. Prior to 1986, these cutting oils were removed from the machine shops as drag-out and transferred to the former underground storage tank prior to disposal. After 1986, these cutting oils were transferred to 55-gallon drums for disposal by a licensed waste hauler. These cutting oils have not been used since 1987.

Since 1987, the cutting oil used is Mobile Mobilmet Omicron, which is greater than 95 percent refined mineral oils and contains no hazardous ingredients.

Whenever possible, coolant is used rather than cutting oil. Arrow 1100B and Arrow 6100 are water-soluble machining coolants which were used until 1988. They were used where cutting oils did not produce the desired finish on machined parts. The Arrow coolants are composed of various concentrations, ethanolamine in water.

TrimSol coolant is currently used in place of cutting oil for most of the parts machined at the facility. TrimSol is a proprietary, nontoxic, water-soluble emulsion which is diluted to approximately 10 percent solution in water for use.

These coolants are not classified as Resource Conservation and Recovery Act (RCRA) or California hazardous wastes.

Used coolant was stored in a 900-gallon aboveground plastic tank and recycled. In the last year, a licensed waste hauler has picked up the used coolant as reduced quantities do not support recycling.

2.4 Miscellaneous

A parts deburring machine, located between Buildings 1 and 9, uses two components for cleaning and deburring metal parts produced in the machine shops in Buildings 1 and 9. A crystalline silica suspended in polyester resin, known as VF2 wedge media, and a compound known as VF 77, are used in the deburring machine. The VF 77 contains 7 percent butanol in a caustic detergent and water solution. The VF 77 is purchased in drums and used in small quantities as required. Drum storage has been between Buildings 1 and 9 near the deburring machine.

During use, the wedge media are disintegrated by being rotated with the parts. The residue empties into a clarifier which is emptied as necessary, transferred to drums, and removed by a hazardous waste hauler.

The facility stores various lubricants (e.g., WD-40 and spray-penetrating oils) which are used in small quantities in production and testing areas. These compounds are typically used in spray bottles which are refilled from 5-gallon storage containers. Bulk storage containers are now stored either in the storage cabinets located on the west side of Building 11 or in the drum storage area near Building 8.

A proprietary packing material, generically named insta-pak, is occasionally used for product shipping. The compounds are mixed to form a foam packing material used to isolate parts in cardboard boxes when necessary. Waste containers are thrown in the garbage for disposal according to the instructions supplied by the manufacturer.

2.5 Cryogenic Test Area

Cryogenic testing has been periodically conducted at the facility. Compounds used during cryogenic testing include liquid nitrogen, liquid propane, and liquid butane. The cryogenic testing compounds are stored in aboveground tanks located in the southwest corner of the facility. When testing is completed, the propane and butane are sold back to the suppliers or burned off in a permitted leg flare located at the north end of the cryogenic area. Liquid nitrogen simply evaporates.

2.6 Diesel Fuel

Diesel fuel is used to power a generator that is needed occasionally for cryogenic testing. The generator is capable of providing 50 hertz as well as 60 hertz. Prior to August 1990, diesel was stored in an underground tank located behind Building 12. The tank was cleaned and abandoned according to all California state and local regulations in August 1990, and documentation is on file at J. C. Carter. Soil samples collected from slant borings below the former diesel tank indicate that no diesel was present in the soils underlying the tank.

3.0 CONCLUSION

This report states the results of a review of the documents available at the facility relative to the use, storage, and disposal of hydrocarbon-based chemicals at the J. C. Carter facility. Information regarding the prior chemical use and disposal has been requested from previous owners.

4.0 REMARKS/SIGNATURES

Information presented in this report is based on information provided by the client. This report has been prepared solely for the use of J. C. Carter, and any reliance on information presented in this report by third parties shall be at such party's sole risk. Other than this, no warranty is implied or intended.

DELTA ENVIRONMENTAL CONSULTANTS, INC.

This report was prepared by: Scott B. Romine — Date 12-1-90
Scott B. Romine
Chemical Engineer

This report was reviewed by: Michael J. O'Brien — Date 12-1-90
Michael J. O'Brien
Hydrogeologist/Project Manager

The work performed in this report was done under the supervision of a California Professional Engineer: Barbara J. Mickelson — Date 12/1/90
Barbara J. Mickelson, P.E.
California Registered
Professional Engineer #43417

REGISTERED PROFESSIONAL ENGINEER
BARBARA JO MICKELSON
No. C043417
Exp. 6/30/92
CIVIL ENGINEERING
STATE OF CALIFORNIA

/law:mjd

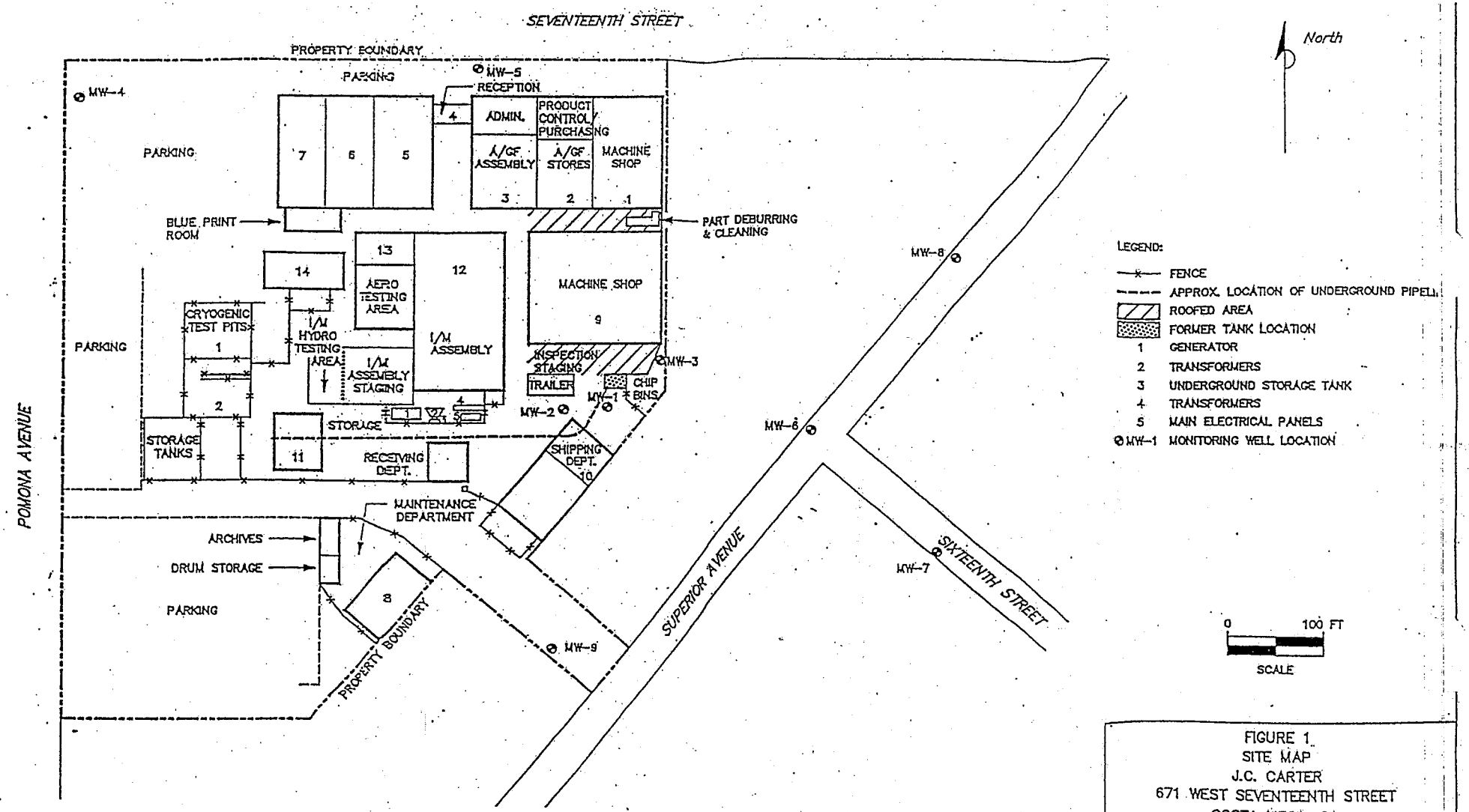

FIGURE 1
SITE MAP
J.C. CARTER
671 WEST SEVENTEENTH STREET
COSTA MESA, CA.

PROJECT NO. 10-90-005	DRAWN BY B.D. 11/27/90
FILE NO. 90-005-1	PREPARED BY SSR 11/28/90
REVISION NO. 3	REVIEWED BY MSU 11-30-90

Delta Environmental Consultants, Inc.

APPENDIX A

Cutting Oil Tank Removal Records

REPORT

TRUESDAIL LABORATORIES, INC.

EMISTS - MICROBIOLOGISTS - ENGINEERS
RESEARCH — DEVELOPMENT — TESTING

14201 FRANKLIN AVENU
TUSTIN, CALIFORNIA 9261
AREA CODE 714 • 730-62
AREA CODE 213 • 225-15
CABLE: TRUELAB

CLIENT Griffin Construction
54712 Cherrylee Lane
Yorba Linda, CA. 92686
ATTN: Jack Griffin

DATE March 21, 1986

RECEIVED March 19, 1986

LABORATORY NO. 11223

SAMPLE Soil from the J.C. Carter - 671 W. 17th St. Costa Mesa

INVESTIGATION Total Petroleum Hydrocarbons Analysis

RESULTS

Sample	Milligrams per Kilogram
JC1 - Pile in and around tank	3220.
JC2 - Bottom of Cavity	6380.
JC3 - Side wall under pipes	10600.

Samples collected by Sylvia Marston of the Orange County, Department of Health Services on March 19, 1986. Soils were received at Truesdail Laboratories chilled and sealed. Analysis was performed according to EPA 418.1.

Respectfully Submitted

TRUESDAIL LABORATORIES, INC.

Richard D. Reid
Chief Water Chemist

This report applies only to the sample, or samples, investigated and is not necessarily indicative of the quality or condition of apparently identical or similar products. As a mutual protection to clients, the public and these Laboratories, this report is submitted and accepted for the exclusive use of the client to whom it is addressed and upon the condition that it is not to be used, in whole or in part, in any

CITY OF COSTA MESA CONSTRUCTION PERMIT

Project Address 671 W. 17th St.

Applicant's Mailing Address 5472 Clairemont Mesa Blvd.

Owner's Name J.C. Carter Co. Phone 549-3421

Address 671 W. 17th St. C.M.

Arch/Eng. _____ License No. _____

Address _____

Contractor's Name [illegible] Phone 535-6525

Address (mailing) 5472 Clairemont Mesa Blvd.

City License No. 035772

LICENSED CONTRACTOR DECLARATION

I hereby affirm that I am licensed under provisions of Chapter 9 (commencing with section 7000) of Division 3 of the Business and Professions Code, and my license is in full force and effect.

License Class B Lic. No. 321996

Date 3-11-86 Signature [illegible]

WORKERS' COMPENSATION DECLARATION

I hereby affirm that I have a certificate of consent to self-insure or a certificate of Workers' Compensation Insurance, or a certified copy thereof (Section 3800, Lab. C.)

Policy No. 22985 # 693 Company STATE FUND

☐ Certified copy is hereby furnished.

☒ Certified copy is filed with the city building inspector.

Date 3-11-86 Applicant [signature]

EXEMPTION FROM WORKERS' COMPENSATION DECLARATION

(This section need not be completed if the permit is for one hundred ($100) or less).

I certify that in the performance of the work for which this permit is issued, I shall not employ any person in any manner so as to become subject to the Workers' Compensation Laws of California.

Dated _____ Signature _____

NOTICE: If, after making this declaration, you should become subject to the Workers' Compensation provisions of the Labor Code, you must forthwith comply with such provisions or this permit shall be deemed revoked.

CONSTRUCTION LENDING AGENCY

I hereby affirm that there is a construction lending agency for the performance of the work for which this permit is issued (Section 3097 Civ. C.)

Lender's Name _____

Lender's Address _____

OWNER BUILDER DECLARATION

I hereby affirm that I am exempt from the Contractor's License Law for the following reason (Section 7031.5 Business and Professions Code): Any city or county which requires a permit to construct, alter, improve, demolish or repair any structure, prior to its issuance, also requires the applicant for such permit to file a signed statement that he/she is licensed pursuant to the provisions of the Contractor's License Law (Chapter 9 (commencing with Section 7000) of Division 3 of the Business and Professions Code) or that he/she is exempt therefrom and the basis for the alleged exemption. Any violation of Section 7031.5 by any applicant for a permit subjects the applicant to a civil penalty of not more than five hundred dollars ($500).

☐ I, as owner of the property or my employees with wages as their sole compensation, will do the work, and the structure is not intended or offered for sale (Section 7044, Business and Professions Code: The Contractor's License Law does not apply to an owner of a property who builds or improves thereon, and who does such work himself/herself or through his or her own employees, provided that such improvements are not intended or offered for sale. If, however, the building or improvement is sold within one year of completion, the owner will have the burden of proving he/she did not build or improve for the purpose of sale).

☐ I, as owner of the property, am exclusively contracting with licensed contractors to construct the project (Section 7044, Business and Professions Code: The Contractor's License Law does not apply to an owner of property who builds or improves thereon, and who contracts for such projects with a contractor(s) licensed pursuant to the Contractor's License Law). I am aware that it is my sole responsibility that Workers' Compensation Insurance should be provided to my employees.

☐ I am exempt under Section _____ B. & P. C. for this reason

Date _____ Owner _____

I hereby certify that I have read this application and state that the above information is correct. I agree to comply with all city and county ordinances and state laws relating to building construction, and hereby authorize representatives of this city to enter upon the above-mentioned property for inspection purposes.

Signature [signature] Date 3-11-86

Owner's Lic. or SS # 775-40-7040

S65-46, rev. 10/84 White - Building; Canary - Applicant; Pink - Accounting; Goldenrod - Assessor

PERMIT NO. R 23036 | TRACT NO. | LOT NO. | UNIT NO.

TYPE OF CONSTRUCTION ☐ NEW ☐ ADD ☐ ALTERATION ☐ REPAIR ☐ CONVERSION ☒ DEMOLISH ☐ OTHER

DESCRIPTION OF WORK/USE OF BLDG.

TYPE OF PERMIT ☐ GRADING ☐ FOUNDATION ☐ STRUCTURAL ☐ TENANT ☐ ELECTRICAL ☐ PLUMBING ☐ MECHANICAL ☒ OTHER Remove tank, backfill w/ concrete

PROJECT DESCRIPTION SQ. FT. _____ OCCUPANCY _____

CONSTRUCTION TYPE _____ VALUATION $ 500.00

ZONE _____ GRADING (CU. YDS) _____ ACRES _____

Remarks: Remove underground cutting oil tank (20 pts water in 1 part oil)

PLUMBING				FEES
Bar Sink		Showers		
Backflow Preventer		Service Sink		
Backflow Irrigation		Sewer Cap		
Bathtubs		Sewer Connection		
Clarifiers		Solar Collectors		
Dishwasher		Solar Piping		
Drinking Fountains		Solar Tank		
Floor Drains		Swimming Pool w/Spa		
Floor Sinks		Urinal		
Gas Service Outlets		Water Closet		
Interceptors		Water Heater		
Kitchen Sink		Water Service		
Lavatories		Auto-Wash		
P-Trap		Laundry Trays		
Roof Drains				
Reinspection Fee	$18	Issue Fee		$ 3

MECHANICAL				FEES
Boiler		Hood or Canopy Type I ☐ Type II ☐		
Duct - Under Ground				
Duct - Structural		Refrigeration System ☐0-100,000 BTU ☐100,000 BTU		
Duct - Ventilating				
Exhaust System ☐ Multiple ☐		System Repair/Alteration		
Fired/Fact. Bit. ICBO #		Fire Dampers		
Heating System & Ducting ☐0-100,000 BTU ☐100,000 BTU		Registers		
Reinspection Fee	$18	Issue Fee		$ 3

A.P. # _____ Zone _____

SETBACKS	Main Building:	Accessory Building:
	Front	
	Rear	
	Right	
	Left	

Ping. Ref. # _____ Parking Req./Provided _____

Planning Notes: _____

ZONING REQTS

ELECTRICAL				FEES
Automatic Washer		Transformer ☐ 15-50 KW ☐ 60 + KW		
Construction Pole Sub.				
Cooking Unit		Meter ☐up to 100 amps		
Dishwasher		Meter ☐over 100 amps		
Dryers ☐Gas ☐Electric		Sub Panel		
Fan		Motors ☐0-1 HP ☐1X - 8		
F.A.U.		Inc. Solar ☐9-15 HP ☐16-15+		
Fixtures		Microwave		
Device Boxes		Pole Light		
Outlets		Range		
Switches		Sign		
Garbage Disposal		Standing Sections		
Generator ☐0-5 KW ☐5-15 KW		Trash Compactor		
Reinspection Fee	$18	Issue Fee		$ 3

DEVELOPMENT SERVICES REQUIREMENTS:

Zoning Approved By _____ Date _____

Building Approved By _____ Date _____

Application Issued By [signature] Date 3/12/86

SUMMARY OF FEES

BUILDING PERMIT	$ 10.00	SMIP	$ .50	
PLAN CHECK	$	PERMIT ISSUANCE	$	
PLUMBING	$	ENERGY P.C.	$	
PLAN CHECK 25%	$	GRADING	$	
ELECTRICAL	$	MICROFILM	$	
PLAN CHECK 50%	$	TOTAL FEE	$ 10.50	
MECHANICAL	$			
PLAN CHECK 25%	$			

APPENDIX B

Chemical Purchase Summary

J.C. CARTER COMPANY, INC.

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
#600 SOLVENT	1/07/84	10 GAL	AERO TEST
#600 SOLVENT	11/13/85	10 GAL	AERO TEST
#600 SOLVENT	11/20/85	20 GAL	AERO TEST
#600 SOLVENT	6/03/86	10 GAL	AERO TEST
#600 SOLVENT	6/08/86	10 GAL	AERO TEST
#600 SOLVENT	10/14/86	10 GAL	MIKOLS
#600 SOLVENT	1/23/87	10 GAL	AERO TEST
#600 SOLVENT	6/26/87	10 GAL	AERO TEST
#600 SOLVENT	1/18/88	25 GAL	ASS'Y
#600 SOLVENT	1/17/90	10 GAL	MACH SHOP
140-66 SOLVENT	11/24/78	500 GAL	MAINT.
140-66 SOLVENT	2/26/85	500 GAL	AERO TEST
140-66 SOLVENT	3/12/85	1000 GAL	AERO TEST
140-66 SOLVENT	4/04/85	600 GAL	I/M TEST
140-66 SOLVENT	6/19/85	500 GAL	AERO TEST
140-66 SOLVENT	8/29/85	500 GAL	AERO TEST
140-66 SOLVENT	12/19/88	500 GAL	MAINT.
ACETONE	6/07/85	10 GAL	AERO TEST
ACETONE	10/31/85	55 GAL	PUMP ASS'Y
ACETONE	11/05/85	365 LB	PUMP ASS'Y
ACETONE	12/24/85	10 GAL	AERO TEST
ACETONE	9/16/86	55 GAL	PUMP ASS'Y
ACETONE	10/14/86	55 GAL	MIKOLS
ACETONE	6/25/87	10 GAL	AERO TEST
ACETONE	1/13/88	55 GAL	ASS'Y
ACETONE	9/22/88	5 GAL	
ACETONE	1/04/89	55 GAL	MIKOLS
ACETONE	7/18/89	55 GAL	MACH SHOP
ACETONE	6/18/90	55 GAL	I/M TEST
AERO HFA AV. HYD. FLUID	2/13/85	55 GAL	AERO G/F
AERO HFA AV. HYD. FLUID	5/31/85	55 GAL	AERO TEST
ARROW 1100B COOLANT	4/27/88	110 GAL	MAINT.
ARROW 1100B COOLANT	6/13/88	110 GAL	MAINT.
ARROW 1100B COOLANT	7/28/88	110 GAL	MAINT.
ARROW 1100B COOLANT	10/10/88	110 GAL	MAINT.
ARROW 6100 COOLANT	5/22/87	110 GAL	MAINT.
ARROW 6100 COOLANT	7/10/87	110 GAL	MAINT.
ARROW 6100 COOLANT	7/27/87	110 GAL	MAINT.
ARROW 6100 COOLANT	10/07/87	110 GAL	MAINT.
ARROW 6100 COOLANT	11/24/87	110 GAL	MAINT.
ARROW 6100 COOLANT	1/29/88	165 GAL	MAINT.
ATF TYPE 210	2/28/85	55 GAL	MAINT.
ATF TYPE 210	1/17/86	55 GAL	MAINT.
ATF TYPE 210	10/06/87	55 GAL	MAINT.
BRAYCO MICRONIC HYD. FLUID	1/17/86	165 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	3/17/86	110 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	5/22/86	55 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	2/11/87	55 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	2/04/88	55 GAL	I/M TEST

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
BRAYCO MICRONIC HYD. FLUID	2/07/89	55 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	5/09/89	165 GAL	AERO TEST
BRAYCO MICRONIC HYD. FLUID	5/31/90	110 GAL	AERO TEST
BRAYCOAT PETROLATUM	10/30/85	48 LB	MIKOLS
BUTANE	9/19/85	4200 GAL	I/M TEST
BUTANE	5/21/86	1000 GAL	I/M/TEST
BUTANE	5/22/86	1000 GAL	I/M TEST
BUTANE	6/06/86	1000 GAL	I/M TEST
CINDOL #3202	1/31/85	110 GAL	MAINT.
CINDOL #3202	3/04/85	110 GAL	MAINT.
CINDOL #3202	4/01/85	110 GAL	MAINT.
CINDOL #3202	5/06/85	110 GAL	MAINT.
CINDOL #3202	6/10/85	110 GAL	MAINT.
CINDOL #3202	7/16/85	108 GAL	MAINT.
CINDOL #3202	8/02/85	108 GAL	MAINT.
CINDOL #3202	9/13/85	108 GAL	MAINT.
CINDOL #3202	10/31/85	108 GAL	MAINT.
CINDOL #3202	12/01/85	108 GAL	MAINT.
CINDOL #3202	1/17/86	110 GAL	MAINT.
CINDOL 757	4/03/86	108 GAL	MAINT.
CINDOL 757	8/12/86	110 GAL	MAINT.
CINDOL 757	12/15/86	108 GAL	MAINT.
CINDOL 757	2/23/87	108 GAL	MAINT.
CINDOL 757	4/06/87	110 GAL	MAINT.
COOLANT	1/24/85	15 GAL	MAINT.
COOLANT	11/06/85	10 GAL	MAINT.
COOLANT	3/04/86	10 GAL	TOOL CRIB
COOLANT	3/28/86	5 GAL	MAINT.
COOLANT	1/13/89	5 GAL	MAINT.
COOLANT	1/25/89	5 GAL	MAINT.
COOLANT	5/08/89	15 GAL	MAINT.
COOLANT	12/22/89	10 GAL	MAINT.
COOLANT	7/20/90	20 GAL	ENG. TEST
CUTTING OIL	3/27/90	110 GAL	MAINT.
DEGREASER (DETERGENT)	1/22/85	55 GAL	MAINT.
DIESEL FUEL	10/02/87	700 GAL	I/M TEST
DIESEL FUEL	10/13/87	903 GAL	I/M TEST
DIESEL FUEL	10/23/87	700 GAL	I/M TEST
DILLO 400 10W MOTOR OIL	6/04/85	24 QTS.	MAINT.
DSL68 COMPRESSOR OIL	1/23/85	10 GAL	MAINT.
DTE LIGHT	7/11/85	110 GAL	MAINT.
DTE LIGHT	11/21/85	55 GAL	MAINT.
DTE LIGHT	11/26/85	55 GAL	MAINT.
DTE LIGHT	9/18/86	55 GAL	MAINT.
DTE LIGHT	3/07/89	55 GAL	MAINT.
DTE LIGHT	12/01/89	55 AGL	MAINT.
DTE LIGHT	10/30/90	55 GAL	MAINT.
DTE-24	1/04/85	5 GAL	MAINT.
DTE-24	3/26/85	55 GAL	MAINT.
DTE-25	3/26/85	55 GAL	MAINT.

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
DTE-25	9/18/86	55 GAL	MAINT.
DTE-25	4/28/87	55 GAL	MAINT.
DTE-25	9/01/87	55 GAL	MAINT.
DTE-25	11/23/87	55 GAL	MAINT.
DTE-25	4/11/88	55 GAL	MAINT.
DTE-25	6/29/89	55 GAL	MAINT.
DTE-25	9/27/89	55 GAL	MAINT.
DTE-25	10/30/90	55 GAL	MAINT.
DTE-26	2/28/85	55 GAL	MAINT.
DTE-26	6/09/86	55 GAL	MAINT.
DTE-26	7/01/88	55 GAL	MAINT.
DTE-26	6/29/89	55 GAL	MAINT.
DTE-26	6/27/90	55 GAL	MAINT.
DUO SEAL PUMP OIL	9/05/85	20 GAL	I/M TEST
DUO SEAL PUMP OIL	9/16/85	20 GAL	I/M TEST
DUO SEAL PUMP OIL	11/07/85	10 GAL	I/M TEST
DUO SEAL PUMP OIL	4/11/86	15 GAL	I/M TEST
DYKEM REMOVER/THINNER	6/28/85	8 GAL	TOOL CRIB
DYKEM REMOVER/THINNER	9/27/85	8 GAL	TOOL CRIB
DYKEM REMOVER/THINNER	11/21/86	8 GAL	TOOL CRIB
EPOXYLITE SOLVENT	9/23/85	1 GAL	VLVE ASS'Y
EPOXYLITE VARNISH	9/23/85	1 GAL	VLVE ASS'Y
HERBASIDAL (WEED KILLER)	6/09/86	5 GAL	I/M TEST
HONING OIL	10/20/86	55 GAL	TOOL CRIB
HYD. OIL	5/09/89	55 GAL	ENG. TEST
INSTA PAK	3/18/85	30 GAL	SHIPPING
INSTA PAK	2/04/86	30 GAL	SHIPPING
INSTA PAK	4/17/86	30 GAL	SHIPPING
INSTA PAK	5/21/86	30 GAL	SHIPPING
INSTA PAK	12/05/88	30 GAL	SHIPPING
ISOPROPYL ALCOHOL	4/11/85	10 GAL	MAINT.
ISOPROPYL ALCOHOL	5/16/85	110 GAL	MAINT.
ISOPROPYL ALCOHOL	9/06/85	110 GAL	MAINT.
ISOPROPYL ALCOHOL	12/24/85	110 GAL	MAINT.
ISOPROPYL ALCOHOL	2/24/86	110 GAL	MAINT.
ISOPROPYL ALCOHOL	5/23/86	110 GAL	MAINT.
ISOPROPYL ALCOHOL	8/28/86	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	12/04/86	110 GAL	MIKOLS
ISOPROPYL ALCOHOL	3/10/87	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	6/22/87	110 GAL	MAINT.
ISOPROPYL ALCOHOL	9/28/87	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	11/03/87	110 GAL	MAINT.
ISOPROPYL ALCOHOL	1/13/88	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	4/11/88	110 GAL	MAINT.
ISOPROPYL ALCOHOL	7/18/88	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	9/02/88	55 GAL	
ISOPROPYL ALCOHOL	9/22/88	110 GAL	MIKOLS
ISOPROPYL ALCOHOL	1/16/89	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	3/23/89	110 GAL	MAINT.
ISOPROPYL ALCOHOL	6/14/89	110 GAL	AERO TEST
ISOPROPYL ALCOHOL	8/01/89	110 GAL	MACH SHOP
ISOPROPYL ALCOHOL			

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
ISOPROPYL ALCOHOL	11/28/89	5 GAL	
ISOPROPYL ALCOHOL	5/01/90	110 GAL	MACH SHOP
ISOPROPYL ALCOHOL	6/07/90	110 GAL	MACH SHOP
ISOPROPYL ALCOHOL	7/09/90	5 GAL	
JET A FUEL	7/11/83	2000 GAL	AERO TEST
JET A FUEL	10/05/83	1600 GAL	AERO TEST
JET A FUEL	3/27/84	1500 GAL	AERO TEST
JET A FUEL	6/27/84	1500 GAL	AERO TEST
JET A FUEL	8/01/84	1100 GAL	AERO TEST
JET A FUEL	9/12/84	1500 GAL	AERO TEST
JET A FUEL	11/07/84	1500 GAL	AERO TEST
JET A FUEL	2/08/85	1000 GAL	AERO TEST
JET A FUEL	3/16/85	1500 GAL.	AERO TEST
JET A FUEL	5/28/85	1200 GAL.	AERO TEST
JET A FUEL	8/15/85	1000 GAL.	AERO TEST
JET A FUEL	11/11/85	1200 GAL.	AERO TEST
JET A FUEL	7/05/88	700 GAL	AERO TEST
JET A FUEL	7/14/88	1000 GAL	AERO TEST
JET A FUEL	11/15/88	1000 GAL	AERO TEST
JET A FUEL	3/14/89	510 GAL	TEST
JET A FUEL	6/12/89	1000 GAL	AERO TEST
JET A FUEL	9/29/89	1000 GAL	AERO TEST
JET A FUEL	5/10/90	1000 GAL	AEROTEST
JET A FUEL	6/12/90	1500 GAL	SERO TEST
JP-4 JET FUEL	12/12/89	5 GAL	ENG TEST
JP-5 JET FUEL	6/16/86	495 GAL	I/M TEST
KESTER FLUX	1/15/85	4 GAL	PUMP ASS'Y
METHYL ALCOHOL	7/03/90	55 GAL	ENG TEST
METHYLETHYLKETONE	1/09/90	1 GAL	AERO TEST
METHYLETHYLKETONE	6/18/90	1 GAL	I/M TEST
MOLD RELEASE 225	8/13/85	4 GAL	PUMP ASS'Y
MOTOR OIL	3/11/88	3 GAL	MAINT.
NAPTHENIC ACID	5/13/88	500 GAL	I/M TEST
NAPTHENIC ACID	5/24/88	500 GAL	I/M TEST
NON DET. MOTOR OIL	6/24/85	24 QTS.	MAINT.
OMICRON CUTTING OIL	9/30/87	110 GAL	MAINT.
OMICRON CUTTING OIL	11/06/87	500 GAL	MAINT
OMICRON CUTTING OIL	12/01/89	110 GAL	MAINT.
OMICRON CUTTING OIL	2/08/90	55 GAL	MAINT.
OMICRON CUTTING OIL	6/27/90	110 GAL	MAINT.
OMICRON CUTTING OIL	8/27/90	110 GAL	MAINT.
PROPANE	10/20/86	541 GALS	I/M TEST
PROPANE	11/14/86	1 CS CYL'S	METR. LAB
PROPANE	11/19/86	2866 GAL	I/M TEST
PROPANE	11/21/86	501 GAL	I/M TEST
ROYCO COOLANT	11/27/89	20 GAL	ENG TEST
RUSTOLEUM SPRAY PAINT	9/11/85	9 GAL	REC.
SKYDROL 500B-4 FLUID	5/09/85	55 GAL	AERO TEST
SKYDROL 500B-4 FLUID	6/24/86	10 GAL	AERO TEST
SKYDROL 500B-4 FLUID	11/06/86	10 GAL	AERO TEST
SKYDROL 500B-4 FLUID	1/06/89	110 GAL	AERO TEST

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
SOLVENT	5/15/90	10 GAL	MAINT.
SOLVENT #1250	11/15/88	6 QUARTS	AERO TEST
SPRAY PAINT	2/17/86	9 GAL	SCALA
SPRAY PAINT	3/17/86	3.5 GAL	STORES
SPRAY PAINT	5/22/86	5 GAL	I/M TEST
TRICHLOROETHANE	1/15/85	55 GAL	PUMP ASS'Y
TRICHLOROETHANE	1/08/86	20 GAL	PUMP ASS'Y
TRIMSOL	11/08/88	5 GAL	MAINT.
TRIMSOL	1/23/89	110 GAL	MAINT.
TRIMSOL	4/24/89	100 GAL	MAINT.
TRIMSOL	9/08/89	108 GAL	MAINT.
TRIMSOL	9/19/89	110 GAL	MAINT.
TRIMSOL	1/10/90	54 GAL	MAINT.
TRIMSOL	3/27/90	54 GAL	MAINT.
TRIMSOL	6/27/90	55 GAL	MAINT.
TRIMSOL	10/25/90	54 GAL	MAINT.
TYPE I FLUID	2/13/85	10 GAL	TEST
TYPE I FLUID	3/18/85	10 GAL	I/M TEST
TYPE I FLUID	3/01/88	25 GAL	I/M TEST
TYPE I FLUID	3/24/88	50 GAL	I/M TEST
TYPE I FLUID	4/22/88	40 GAL	I/M TEST
TYPE I FLUID	7/22/88	15 GAL	I/M TEST
TYPE II SOLVENT	5/17/85	110 GAL	I/M TEST
TYPE II SOLVENT	9/25/85	108 GAL	I/M TEST
TYPE II SOLVENT	11/03/85	500 GAL	AERO TEST
TYPE II SOLVENT	11/13/85	500 GAL	AERO TEST
TYPE II SOLVENT	1/02/86	500 GAL	AERO TEST
TYPE II SOLVENT	3/13/86	800 GAL	AERO TEST
TYPE II SOLVENT	5/30/86	500 GAL	AERO TEST
TYPE II SOLVENT	6/11/86	600 GAL	I/M TEST
TYPE II SOLVENT	6/13/86	600 GAL	I/M TEST
TYPE II SOLVENT	8/21/86	500 GAL	AERO TEST
TYPE II SOLVENT	11/20/86	500 GAL	AERO TEST
TYPE II SOLVENT	1/26/87	500 GAL	AERO TEST
TYPE II SOLVENT	4/20/87	500 GAL	AERO TEST
TYPE II SOLVENT	5/12/87	300 GAL	AERO TEST
TYPE II SOLVENT	7/28/87	500 GAL	AERO TEST
TYPE II SOLVENT	12/02/87	300 GAL	I/M TEST
TYPE II SOLVENT	1/12/88	500 GAL	I/M TEST
TYPE II SOLVENT	1/18/88	275 GAL	AERO TEST
TYPE II SOLVENT	3/02/88	500 GAL	I/M TEST
TYPE II SOLVENT	4/07/88	500 GAL	I/M TEST
TYPE II SOLVENT	5/20/88	500 GAL	AERO TEST
TYPE II SOLVENT	7/01/88	500 GAL	AERO TEST
TYPE II SOLVENT	7/21/88	500 GAL	AERO TEST
TYPE II SOLVENT	8/09/88	500 GAL	I/M TEST
TYPE II SOLVENT	9/06/88	500 GAL	AERO TEST
TYPE II SOLVENT	9/13/88	500 GAL	AERO TEST
TYPE II SOLVENT	5/22/89	510 GAL	TEST
TYPE II SOLVENT	7/06/89	500 GAL	AERO TEST
TYPE II SOLVENT	9/29/89	500 GAL	AERO TEST

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
TYPE II SOLVENT	3/09/90	500 GAL	I/M TEST
TYPE II SOLVENT	6/08/90	1000 GAL	TEST
TYPE II SOLVENT	7/19/90	475 GAL	AERO TEST
TYPE III FLUID	2/13/85	10 GAL	TEST
TYPE III FLUID	3/18/85	10 GAL	I/M TEST
TYPE III FLUID	5/16/85	15 GAL	I/M TEST
TYPE III FLUID	7/02/85	15 GAL	I/M TEST
TYPE III FLUID	3/01/88	20 GAL	I/M TEST
TYPE III FLUID	10/17/89	15 GAL	TEST
UNISOL	12/10/87	5 GAL	MAINT.
VACTRA #2	2/28/85	55 GAL	MAINT.
VACTRA #2	3/26/85	55 GAL	MAINT.
VACTRA #2	5/01/85	55 GAL	MAINT.
VACTRA #2	6/04/85	55 GAL	MAINT.
VACTRA #2	8/08/85	55 GAL	MAINT.
VACTRA #2	9/09/85	55 GAL	MAINT.
VACTRA #2	10/07/85	110 GAL	MAINT.
VACTRA #2	11/21/85	55 GAL	MAINT.
VACTRA #2	11/26/85	55 GAL	MAINT.
VACTRA #2	1/17/86	55 GAL	MAINT.
VACTRA #2	9/18/86	55 GAL	MAINT.
VACTRA #2	11/13/86	55 GAL	MAINT.
VACTRA #2	3/17/87	55 GAL	MAINT.
VACTRA #2	5/29/87	55 GAL	MAINT.
VACTRA #2	9/01/87	55 GAL	MAINT.
VACTRA #2	9/30/87	55 GAL	MAINT.
VACTRA #2	11/23/87	55 GAL	MAINT.
VACTRA #2	1/29/88	55 GAL	MAINT.
VACTRA #2	3/11/88	55 GAL	MAINT.
VACTRA #2	4/11/88	55 GAL	MAINT.
VACTRA #2	7/01/88	55 GAL	MAINT.
VACTRA #2	8/29/88	55 GAL	MAINT.
VACTRA #2	10/10/88	55 GAL	MAINT.
VACTRA #2	3/07/89	55 GAL	MAINT.
VACTRA #2	6/29/89	55 GAL	MAINT.
VACTRA #2	8/09/89	55 GAL	MAINT.
VACTRA #2	9/18/89	55 GAL	MAINT.
VACTRA #2	9/27/89	55 GAL	MAINT.
VACTRA #2	3/27/90	55 GAL	MAINT.
VACTRA #2	7/10/90	55 GAL	MAINT.
VACTRA #2	10/04/90	110 GAL	MAINT.
VACTRA #4	9/26/86	5 GAL	MAINT.
VACULINE 1405	3/14/85	30 GAL	MAINT.
VACULINE 1405	9/01/87	25 GAL	MAINT.
VELOCITE #6	2/20/85	15 GAL	MAINT.
VELOCITE #6	3/26/85	15 GAL	MAINT.
VELOCITE #6	6/09/86	15 GAL	MAINT.
VELOCITE #6	9/18/86	15 GAL	MAINT.
VELOCITE #6	7/01/88	10 GAL	MAINT.
VELOCITE #6	10/10/88	20 GAL	MAINT.
VELOCITE #6	9/18/89	10 GAL	MAINT.

CHEMICAL PURCHASE SUMMARY

12/01/90

COMPOUND	P/O DATE	ORDER QUANTITY	DEPARTMENT
VELOCITE #6	6/27/90	35 GAL	MAINT.
VF-2 MEDIA	5/03/89	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	1/24/85	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	3/21/85	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	6/24/85	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	9/11/85	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	7/18/86	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	11/03/86	1000 LB	AERO M/S
VF-2 WEDGE MEDIA	3/16/87	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	8/21/87	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	10/15/87	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	7/29/88	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	9/16/88	1000 LB	MACH SHOP
VF-2 WEDGE MEDIA	6/07/90	1000 LB	MACH SHOP
VF-77 CLEANING COMPOUND	1/02/85	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	4/01/85	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	7/22/85	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	10/22/85	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	1/22/86	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	2/21/86	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	7/18/86	55 GAL	AERO M/S
VF-77 CLEANING COMPOUND	3/16/87	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	8/21/87	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	10/15/87	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	5/18/88	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	8/03/88	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	11/09/88	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	9/28/89	55 GAL	MACH SHOP
VF-77 CLEANING COMPOUND	3/12/90	55 GAL	MACH SHOP
WD-40	11/07/85	144 OUNCES	I/M TEST
WD-40	11/25/85	5 GAL	MIKOLS
WD-40	5/18/87	1 GAL	ACRS
WD-40	10/19/88	5 GAL	MIKOLS
WD-40	9/05/89	9 PINTS	STORES

APPENDIX C

Chemical Disposal Summary

J.C. CARTER COMPANY, INC.
CHEMICAL DISPOSAL SUMMARY

11/29/90

DISPOSAL DATE	DESCRIPTION	QUANTITY DISPOSED
2/04/81	WATER AND OIL	1700 GALLONS
4/08/81	WATER AND OIL	UNKNOWN
6/05/81	WATER AND METHANOL	1800 GALLONS
8/11/81	WATER AND MUD	UNKNOWN
12/16/81	WATER AND JET A FUEL	2000 GALLONS
12/17/81	WATER AND JET A FUEL	400 GALLONS
2/24/82	WATER AND OIL	1900 GALLONS
3/03/82	WATER	1800 GALLONS
3/20/82	WATER AND OIL	2000 GALLONS
4/02/82	OIL	1620 GALLONS
4/08/82	WATER AND OIL	2000 GALLONS
7/30/82	WATER AND OIL	2000 GALLONS
11/10/82	AVIATION FUEL	1860 GALLONS
12/22/82	OIL	340 GALLONS
2/09/83	WATER AND OIL	2000 GALLONS
2/23/83	WATER AND OIL	2000 GALLONS
3/04/83	WASTE WATER	2000 GALLONS
7/14/83	WATER AND JET A FUEL	1025 GALLONS
7/21/83	WATER AND OIL	2000 GALLONS
11/18/83	JET A FUEL	1500 GALLONS
12/22/83	WATER AND OIL	2000 GALLONS
4/30/84	WATER AND OIL	2000 GALLONS
6/06/84	WASTE OIL	1425 GALLONS
7/18/84	WASTE OIL	1200 GALLONS
9/11/84	WATER AND OIL	2000 GALLONS
9/12/84	WASTE OIL	450 GALLONS
12/18/84	WASTE OIL	1350 GALLONS
2/27/85	WATER AND OIL	2000 GALLONS
3/01/85	WASTE OIL	350 GALLONS
5/03/85	WATER AND OIL	1500 GALLONS
5/08/85	WATER AND OIL	100 GALLONS
6/10/85	WASTE OIL	1400 GALLONS
9/17/85	WATER AND OIL	500 GALLONS
9/25/85	WATER AND OIL	5295 GALLONS
11/12/85	WASTE OIL	1300 GALLONS
11/13/85	WATER AND OIL	1000 GALLONS
11/18/85	WASTE OIL	8145 GALLONS
12/02/85	WATER AND OIL	600 GALLONS