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

REPLY TO THE ATTENTION OF:

MEMORANDUM

SUBJECT: Draft No Further Action Memo for former Covermaster site

FROM: Joseph Kelly, Project Manager
Corrective Action Section 1

THRU: Don Heller, Acting Chief
Corrective Action Section 1

TO: Jose G. Cisneros, Chief
Remediation and Reuse Branch

Attached is a draft No Further Action Memo for the former Covermaster site. This site is subject to Corrective Action as a result of an illegal drum storage area. The site was not permitted, and the area was addressed by closure through the State. No contamination was detected above screening levels, so there are no site restrictions. All of the information for this site was obtained from IDEM's virtual records. I reviewed inspection records and follow up inspections, copies of the Agreed Order, and approval letters from IDEM. There was no PA/VSI completed as this was not a priority site. State inspections did not report any other areas of concern that were required to be addressed under RCRA, and Covermaster had gone bankrupt by the time of my inspection in 2011. The site was being used by Truck Accessories Group at that time. The closure report and associated data was previously unavailable from IDEM, and we had considered contractor funding to collect confirmation samples, but IDEM located and provided the report. A draft Statement of Basis was provided to Vic Windel and Mike Sickels of IDEM, but the letter was revised to a NFA after their review, and the current draft incorporates their comments. Mike Beedle approved the letter as Acting, but requested that tables be added/revised to the draft for reference. Don Heller signed as Acting Section Chief and Mark Palermo signed for ORC. I subsequently updated the document with your comments.

Determination of No Further Action

Former Covermaster, Inc.
(Truck Accessories Group DBA Leer Midwest) Property
57784 County Road 3 South
Elkhart, Indiana

IND 982 204 349

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

August 2014

Former Covermaster, Inc.
(Truck Accessories Group DBA Leer Midwest) Property
57784 County Road 3 South
Elkhart, Indiana
IND 982 204 349

INTRODUCTION

This document for the former Covermaster, Inc. site (currently owned by CM Realty of Elkhart and operated by Truck Accessories Group DBA Leer Midwest), located at 57784 County Road 3 South, Baugo Township, Elkhart County, Elkhart, Indiana and hereinafter referred to as "Facility" or "Site", explains the basis for the United States Environmental Protection Agency's (EPA's) determination that no further RCRA corrective action is required for this Facility.

This document summarizes information that can be found in greater detail in the August 8, 1995 *Adoption of Agreed Order in Cause No. H-11979*, the October 16, 1996 *Covermaster, Inc. Revised Closure Plan (Agreed Order, Cause No. H-11979)*, the October 5, 1996 *Exterior Hazardous Waste (Drum) Storage Unit Revised Closure Plan*, the January 21, 1997 *Closure Plan Approval*, the May 19, 1997 *Exterior Hazardous Waste (Drum) Storage Unit Closure Report*, the November 20, 1997 *Re-decontamination Report Per Notice of Deficiency (9/9/97),* the January 14, 1998 *Closure Certification,* the July 10, 2004 *Hazardous Waste Inspection Report* by IDEM, the April 20, 2010 *Volatile Organic Compounds (VOCs) in Drinking Water State Form*, subsequent revisions of these documents, and other documents in the administrative record for the former Covermaster Facility, located in the EPA 7th floor Record Center, 77 W. Jackson Blvd., Chicago, IL.

DETERMINATION

EPA has made a determination that no further action by the federal RCRA corrective action program is required at the former Covermaster Facility at this time.

FACILITY BACKGROUND

Location

The former Covermaster Facility at 57784 County Road 3 South, in Elkhart, Indiana encompasses an estimated 180,000 square feet. The site is located in an industrial area of Elkhart, with residential areas located to the west of County Road 3; a large industrial property (Summit Fiberglass, previously B&P Woodgrain Paneling - IND021639596) located to the east

of the site, and further east is an industrial area known as Cobra Industrial Park. The property to the south is occupied by Travel Units, a manufacturer of recreational vehicles. To the north of the site is R.B. Gustafson, a manufacturer and distributor of low-voltage lighting (see Figure 1).

The property contains an estimated 75,000 square-foot building with sales offices on the west side, and a large production area apparently comprising the majority of the building. The entire ground surface at the property is asphalt-paved or concrete covered, with the exception of a small courtyard area located north of the building in the central portion of the site.

History

The property was previously used by Covermaster, Inc. for the manufacturing of truck caps, truck toppers and camper shells from approximately the mid-1980s until 2008. Covermaster's former manufacturing operations included gel coat, trimming, grinding, painting, and assembly. The site is currently occupied by Truck Accessories Group, LLC dba LEER Midwest, which performs operations similar to those performed by Covermaster. Prior to development by Covermaster, the property appears to have been used for agricultural purposes, based on available aerial photographs.

Waste Generation and Management History

Covermaster reportedly utilized styrene resins and gel coat that were catalyzed with methyl ethyl ketone peroxide. Waste streams associated with site operations included waste acetone, waste paint, waste lacquer thinner, and lacquer thinner still bottoms, along with filters, chop, and scrapings. The primary waste, acetone, was generated during the cleaning of equipment, paint guns, and process equipment, and was staged in satellite accumulation areas within the building before transfer to a storage area in the southeastern portion of the site for pickup and disposal by waste haulers.

Information from the Indiana Department of Environmental Management (IDEM) indicates that the site became subject to RCRA Corrective Action due to illegal hazardous waste storage by the former owner. Based on an inspection of the Covermaster facility and operations conducted by IDEM on June 16, 1994, it was determined the facility was illegally storing hazardous waste acetone longer than 90 days without a permit. At that time, a total of fifty-six 55-gallon drums were present at the site that had been staged for up to five years without a permit. The majority of the drums were located inside of the building on the concrete floor at the southeastern corner of the building, and ten drums were located in an adjacent exterior storage area at the southeast corner of the building. IDEM identified this area as a RCRA Hazardous Waste Container Storage Area that would require clean closure. As a result, Covermaster entered into an Agreed Order

(Cause No. H-11979), adopted August 8, 1995, with IDEM to address this area that is considered Solid Waste Management Unit (SWMU) 1 (See Figure 2).

In October 1996, Covermaster submitted a RCRA Closure Plan for the former Hazardous Waste Container Storage Area. On January 21, 1997, the Closure Plan was approved by IDEM and Covermaster initiated the closure. The closure plan included plans for decontamination of the storage pad and a soil investigation at the storage area.

Aside from the closure of the former hazardous waste storage area that was completed in 1998, no further RCRA Corrective Action has taken place at the Facility. Compliance inspections performed by IDEM at Covermaster on July 10, 2004, and at Truck Accessories Group on August 8, 2009, identified only minor violations that were corrected, and the inspection reports further documented that there were no visible releases of waste observed.

A representative of the EPA's corrective action program made a site visit in September 2011 and observed that the area of the former cleanup at the facility had not changed significantly since the time of the cleanup. The current Site operator, Truck Accessories Group DBA Leer Midwest, is a Large Quantity Generator (LQG) under RCRA and conducts operations similar to those of Covermaster.

Geologic and Hydrogeologic Setting

Aquifers underlying Elkhart consist mainly of unconsolidated sands and gravels, with an average saturated thickness of approximately 175 feet above Devonian and Mississippian age shale bedrock. The water table typically is found 10 feet below the surface, and the direction of ground water flow is predominantly northwestward, toward the St. Joseph River.

Soils below the surface finish of asphalt or concrete consist of native glacial till augmented with fill materials. The native till in this area consists mostly of sand and gravel, at least 100 feet thick, with lesser amounts of silt and clay. Bedrock in the region is predominantly shale.

Ecological Setting

The entire Covermaster facility is asphalt-paved or concrete covered, with the exception of a small courtyard area (approximately 8,000 square feet), which contains primarily decorative grass. In general, there are no high-quality habitats at the facility because the area surrounding the Site is primarily industrial in nature. As a result, the surrounding habitats are of low ecological concern.

The only endangered species listed for the area by the U.S. Fish and Wildlife Service are the Indiana Bat and the Eastern Massasauga (rattlesnake), which are not expected to be present at the site given that the site's physical barriers would not allow development of wildlife habitats, and since the managed courtyard area (less than 1/4 acre) is unlikely to support wildlife.

Given the Site's physical setting, the lack of quality ecological habitat both on- and off-site, and the results of the closure investigations, the Site would not be expected to provide suitable habitat for the listed endangered species and the level of ecological risks from site contaminants has been determined to be negligible.

Investigation Results

SWMU 1 – Former Hazardous Waste Container Storage Area

Description and Release History

This SWMU encompasses the 10' x 40' asphalt-paved former exterior storage pad previously located southeast of the facility building and the adjacent interior storage area. The area was used for the storage of D001 and F003 hazardous wastes generated at the Facility.

Release Control, Response Actions, and Environmental Data

Covermaster contracted with Safety & Environmental Resources Inc. (SER) to complete closure as outlined in IDEM's 1994 Agreed Order. Drums that were located in the storage area were removed under the Agreed Order. In February 1997, Covermaster conducted sampling in accordance with an IDEM-approved work plan to determine the nature and extent of impacts of discharges from the hazardous waste storage area, consistent with the approved Closure Plan developed under the Agreed Order. Two soil borings were advanced on each half of the storage pad on February 19, 1997. A total of two soil samples were collected from each boring in one foot increments to a depth of two feet, and four of the soil samples were subsequently analyzed for VOCs and semi-volatile organic compounds (SVOCs). Results from the soil samples indicated that VOCs and SVOCs were not detected, although 1,1,1-trichloroethane (1,1,1-TCA) had been previously detected at 2 ug/kg (parts per billion-ppb) in a sample collected beneath the pad on July 3, 1996. Since 1,1,1-TCA was not used on-site, the detection in the soil was suspected to be related to the use of water from an on-site well during drilling. When sampled, the well was also found to contain 1,1,1-TCA at the same level in the groundwater as in the soil sample (2 ppb). Since the initial results indicated that the soil below the pad was not contaminated, the SWMU was decontaminated in March 1997 and

left in-place, in accordance with the IDEM-approved Closure Plan. The soil sampling and decontamination activities were completed to the satisfaction of IDEM, which approved the closure on January 14, 1998.

The referenced drinking water well is a private well operated and maintained by the facility for on-site water use. Groundwater from the well was previously sampled when 1,1,1-TCA was found in the initial soil sample. This well was also sampled and analyzed in connection with the site's compliance monitoring for public water supplies using groundwater as a drinking water source, in accordance with State of Indiana drinking water regulations. Low levels of a volatile organic compound (VOC) have been present in the well, however, the site is located in an area of known groundwater contamination, based on the ATSDR National Exposure Registry, TCE Sub-registry of sites in the Elkhart area. Water samples from the well for the period between 2003 and 2005 have shown the presence of low levels of 1,1,1-TCA, but samples from wells on neighboring properties also have shown the presence of 1,1,1-TCA at similar levels, so the contaminant identified may be attributable to this regional groundwater contamination.

The cumulative results indicate that no impacts above screening levels were detected in the soil or groundwater at the facility. Under the Order, contaminant levels in the soil were screened against the laboratory practical quantitation limits (PQLs), and contaminant levels in groundwater were screened against EPA's maximum contaminant levels (MCLs). Only one contaminant (1,1,1-TCA) was detected in the soil at a concentration of 2 parts per billion (ppb). The same contaminant was present in samples from the site's drinking water well, generally at a concentration of 0.6 ppb. However, since there is no historical information showing that this compound was used on-site, and the contaminant levels are significantly lower than the concentrations that would require cleanup, the State considered the closure to be complete without requiring cleanup beyond the decontamination of the storage pad. The current screening criteria for the contaminant are provided below in micrograms per kilogram (ug/kg) or micrograms per liter (ug/L), equivalent to parts per billion (ppb), showing that the levels detected in the soil and water are much lower than the levels that would require cleanup:

	Maximum level detected at site	EPA Screening Criteria
1,1,1-TCA (soil)	2 ppb	70 ppb
1,1,1-TCA (groundwater)	2 ppb	200 ppb

Analytical data tables for soil and water samples collected during investigation and closure are shown in Attachments A and B.

SUMMARY OF FACILITY RISKS

Human Health Risks

Based on the available information cited above, closure for the former hazardous waste container storage area was approved by IDEM on January 14, 1998. All wastes were removed and investigation of sites soil and groundwater found that all contaminants in the former storage area were at concentrations below the most-stringent screening criteria for soil and groundwater. Although the site is currently used for industrial purposes, since no contaminants of concern were found to exceed the default residential screening criteria for soil and groundwater, there would be no restrictions to prevent land use changes to other use scenarios.

Ecological Risks

Based on the available evidence cited above, there is adequate information to conclude that ecological risks are negligible at the Site. The entire Facility is covered by concrete or asphalt parking and buildings, with the exception of a small courtyard to the north of the building. There is no evidence that any areas of the site have been impacted by releases from the SWMU 1 area, based upon the sampling conducted as part of closure activities. Given the absence of native ecosystems at the facility and the absence of identified impacts, there are no risks to sensitive onsite organisms.

SCOPE OF CORRECTIVE ACTION

The intention of corrective measures is to eliminate the threat of exposures by meeting the following objectives:

- Remediating contamination which presents a risk to human health or the environment, or eliminating the pathways of exposure to such contaminants;
- Appropriately managing any residual wastes disposed on-site such that they do not present a risk to human health or the environment, and
- Protecting sensitive ecosystems.

Performance Standards for Corrective Measures

Remedial alternatives must meet three performance standards, which are the main objectives of a corrective action program under the RCRA.

1. Protect human health and the environment;

2. Achieve media cleanup objectives, and

3. Remediate the sources of releases.

CONCLUSION

Based upon the information presented in this document and in the Administrative Record regarding releases and remedial actions performed at this Site to address those releases, EPA has determined that no further action by the federal RCRA corrective action program is necessary at the Site at this time. The site conditions were assessed against the objectives for eliminating threats from a site named above and EPA believes that the management of the site has met those objectives. After review of the efforts undertaken at the site previously by Covermaster, EPA believes that the cleanup of the site was effective and met the three performance standards listed above. EPA also believes there is no information indicating releases have occurred from the current RCRA LQG operations.

The Facility completed remediation of the waste management areas in 1998. The documentation from the 1994-1998 remediation work demonstrates that the Site has already achieved appropriate risk reduction, prevented the migration of contaminants, and eliminated the threat of exposure, based on the conditions established and confirmed by IDEM in 1998 during the closure of the Former Hazardous Waste Container Storage Area. The former SWMU does not present concern for human health and the environment under the current conditions, and EPA believes no other SWMUs or AOCs exist at the site that are subject to corrective action. EPA believes the Site has achieved a CA070NO (no further investigation needed), CA400 (remedy decision), CA550-NR (remedy construction complete-no remedy) CA 900 NL (No Controls are Necessary)." EPA reserves the right to change, modify or otherwise rescind this determination based on new information or information not available to EPA at the time of this determination.

Name	Title	Signature	Date
Joseph Kelly	Project Manager		7/28/14
Mark Palermo	Regional Counsel		8/5/14
Don Heller	Supervisor (Acting)		7-29-14
Jose Cisneros	Branch Chief		8/29/14

Figure 1

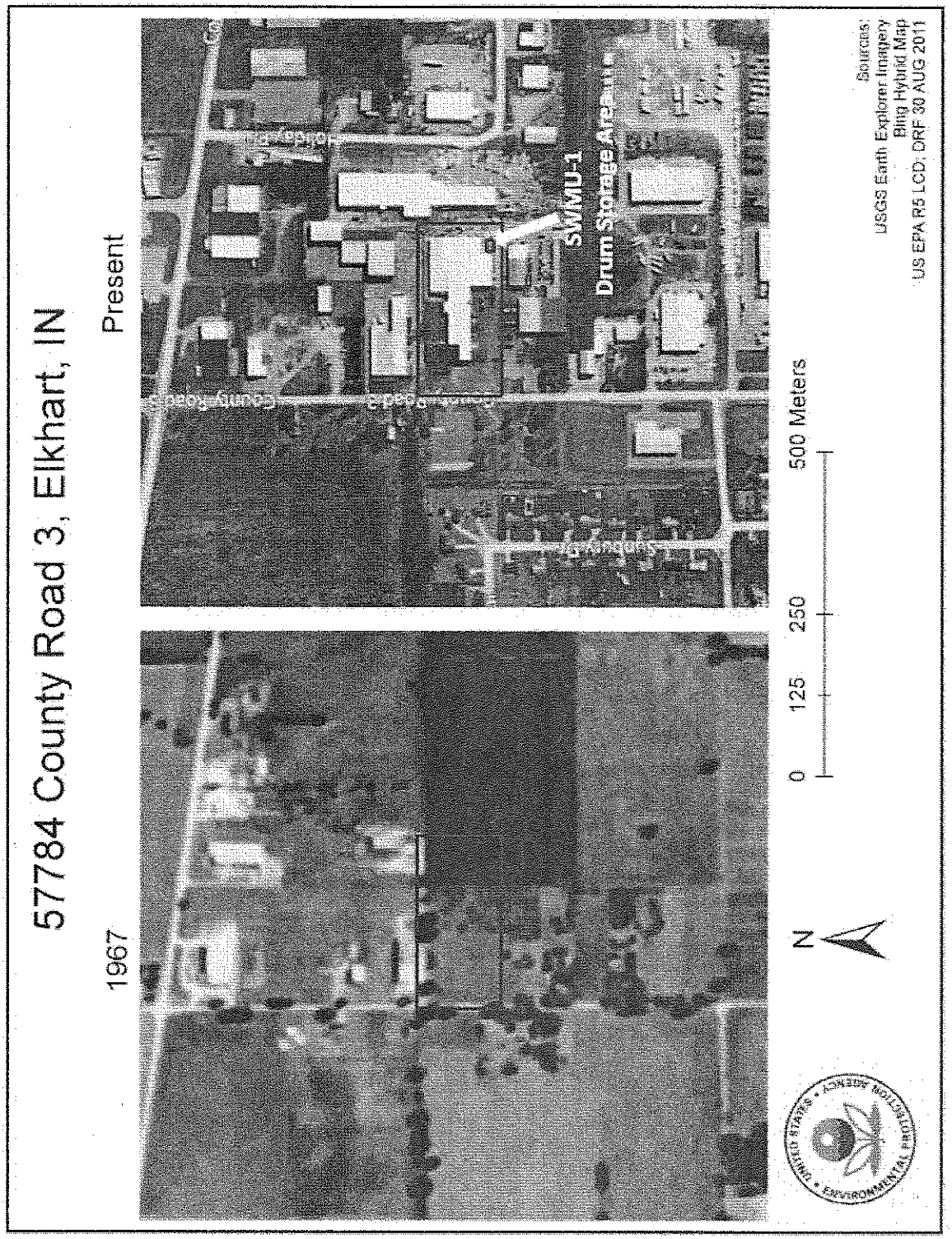
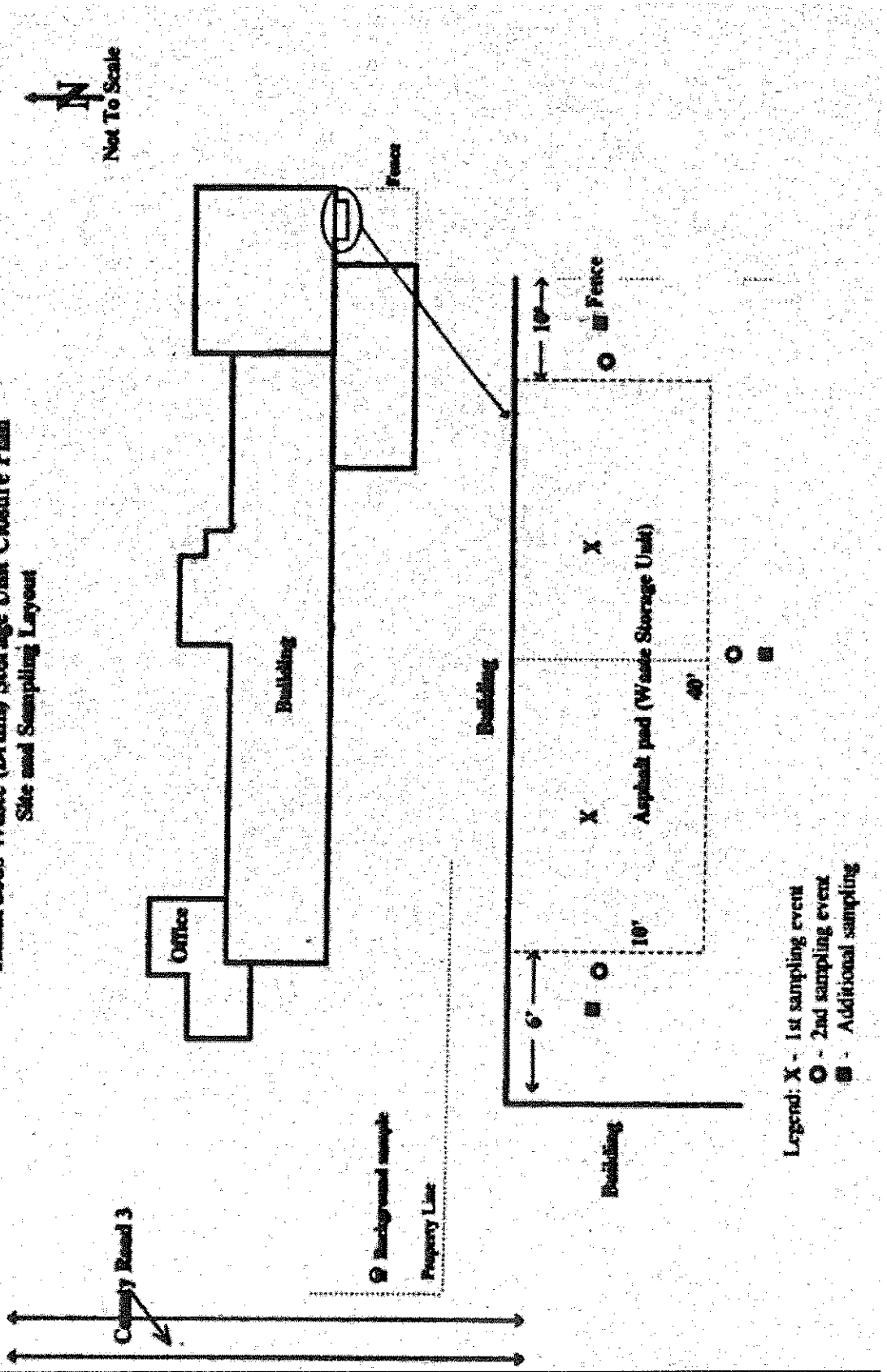


Figure 2



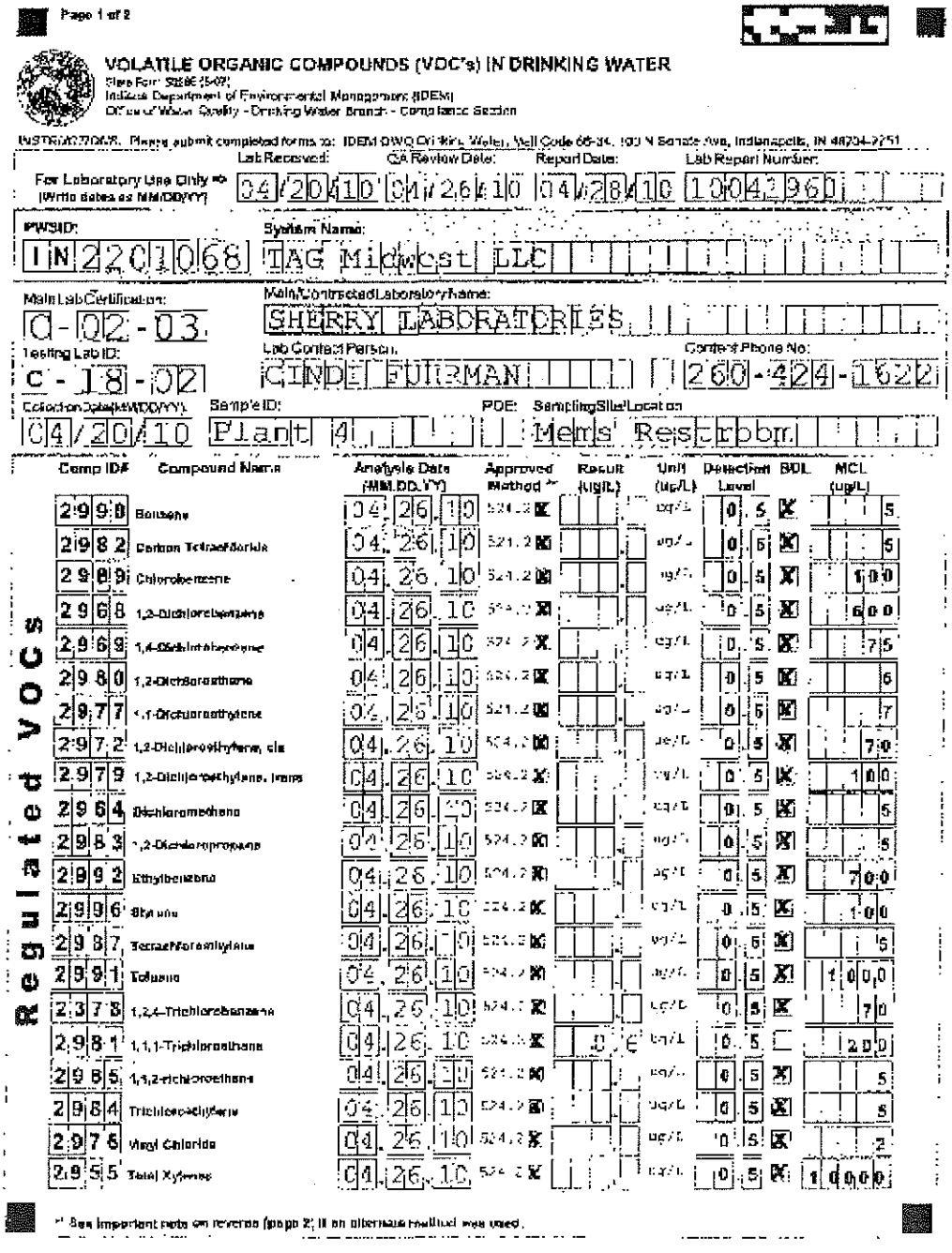
Attachment A – Final Soil Results

Analytes	Method of Analysis	Source
Total Volatile Organic Compounds (VOC)	EPA 8260	SW-846
Total Semi-Volatile Organic Compounds (SVOC)	EPA 8270	SW-846

6. RESULTS OF ANALYSIS

Sample Location	Depth ID	Depths	Lab ID	Analysis	Results
Boring A	A1 A2 A3 A4	6" 1.5' 3' 5'	96A3305	VOC	1,1,1-Trichloroethane <2 ug/kg (MCL - 0.2 mg/L)
Boring A	A5 A6	6" and 1.5' 3' and 5'	96A3306	SVOC	None Detected
Boring B	B1 B2 B3 B4	6" 1.5' 3' 5'	96A3307	VOC	None Detected
Boring B	B5 B6	6" and 1.5' 3' and 5'	96A3308	SVOC	None Detected
Well Water			[illegible]		1,1,1-Trichloroethane <2 ug/L (MCL - 0.2 mg/L)
Field and Trip Blank			96A3310		None Detected
Previous [illegible] Sample			[illegible]	VOC and SVOC	Naphthalene - 5.7 ug/L [illegible] - 5.45 mg/kg

Attachment B – Drinking Water Sample



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VOLATILE ORGANIC COMPOUNDS (VOC's) IN DRINKING WATER

State Form 52886 (5-07)
Indiana Department of Environmental Management (IDEM)
Office of Water Quality - Drinking Water Branch - Compliance Section

INSTRUCTIONS: Please submit completed forms to: IDEM OWQ Drinking Water, Mail Code 66-34, 100 N Senate Ave, Indianapolis, IN 46204-2251

For Laboratory Use Only => (Write dates as MM/DD/YY)	Lab Received:	QA Review Date:	Report Date:	Lab Report Number:
	04/20/10	04/26/10	04/28/10	10042960

PWSID: IN2201068 System Name: TAG Midwest LLC

Main Lab Certification: C-02-03 Main/Contracted Laboratory Name: SHERRY LABORATORIES

Testing Lab ID: C-18-02 Lab Contact Person: CINDI FURMAN Contact Phone No: 260-424-1622

Collection Date (MM/DD/YY): 04/20/10 Sample ID: Plant 4 POE: Sampling Site/Location: Mens Restroom

Regulated VOCs

Comp ID#	Compound Name	Analysis Date (MM.DD.YY)	Approved Method **	Result (ug/L)	Unit (ug/L)	Detection Level	BDL	MCL (ug/L)
2990	Benzene	04.26.10	524.2		ug/L	0.5	X	5
2982	Carbon Tetrachloride	04.26.10	524.2		ug/L	0.5	X	5
2989	Chlorobenzene	04.26.10	524.2		ug/L	0.5	X	100
2968	1,2-Dichlorobenzene	04.26.10	524.2		ug/L	0.5	X	600
2969	1,4-Dichlorobenzene	04.26.10	524.2		ug/L	0.5	X	75
2980	1,2-Dichloroethane	04.26.10	524.2		ug/L	0.5	X	5
2977	1,1-Dichloroethylene	04.26.10	524.2		ug/L	0.5	X	7
2972	1,2-Dichloroethylene, cis	04.26.10	524.2		ug/L	0.5	X	70
2979	1,2-Dichloroethylene, trans	04.26.10	524.2		ug/L	0.5	X	100
2964	Dichloromethane	04.26.10	524.2		ug/L	0.5	X	5
2983	1,2-Dichloropropane	04.26.10	524.2		ug/L	0.5	X	5
2992	Ethylbenzene	04.26.10	524.2		ug/L	0.5	X	700
2996	Styrene	04.26.10	524.2		ug/L	0.5	X	100
2987	Tetrachloroethylene	04.26.10	524.2		ug/L	0.5	X	5
2991	Toluene	04.26.10	524.2		ug/L	0.5	X	1000
2378	1,2,4-Trichlorobenzene	04.26.10	524.2		ug/L	0.5	X	70
2981	1,1,1-Trichloroethane	04.26.10	524.2	0.6	ug/L	0.5		200
2985	1,1,2-Trichloroethane	04.26.10	524.2		ug/L	0.5	X	5
2984	Trichloroethylene	04.26.10	524.2		ug/L	0.5	X	5
2976	Vinyl Chloride	04.26.10	524.2		ug/L	0.5	X	2
2955	Total Xylenes	04.26.10	524.2		ug/L	0.5	X	10000

** See important note on reverse (page 2) if an alternate method was used.

PWSID: IN2201068

Collection Date (MM/DD/YY): 04.20.10

Unregulated VOCs

Comp ID#	Compound Name	Analysis Date (MM.DD.YY)	Approved Method	Result (ug/L)	Unit (ug/L)	Detection Level	BDL
2993	Bromobenzene	04.26.10	524.2 ☒		ug/L	0.5	☒
2214	Bromomethane	04.26.10	524.2 ☒		ug/L	0.5	☒
2216	Chloroethane	04.26.10	524.2 ☒		ug/L	0.5	☒
2210	Chloromethane	04.26.10	524.2 ☒		ug/L	0.5	☒
2965	2-Chlorotoluene	04.26.10	524.2 ☒		ug/L	0.5	☒
2956	4-Chlorotoluene	04.26.10	524.2 ☒		ug/L	0.5	☒
2967	1,3-Dichlorobenzene	04.26.10	524.2 ☒		ug/L	0.5	☒
2978	1,1-Dichloroethane	04.26.10	524.2 ☒		ug/L	0.5	☒
2412	1,3-Dichloropropane	04.26.10	524.2 ☒		ug/L	0.5	☒
2416	2,2-Dichloropropane	04.26.10	524.2 ☒		ug/L	0.5	☒
2410	1,1-Dichloropropene	04.26.10	524.2 ☒		ug/L	0.5	☒
2413	1,3-Dichloropropene (cis & trans)	04.26.10	524.2 ☒		ug/L	0.5	☒
2986	1,1,1,2-Tetrachloroethane	04.26.10	524.2 ☒		ug/L	0.5	☒
2988	1,1,2,2-Tetrachloroethane	04.26.10	524.2 ☒		ug/L	0.5	☒
2414	1,2,3-Trichloropropane	04.26.10	524.2 ☒		ug/L	0.5	☒
2408	Dibromomethane	04.26.10	524.2 ☒		ug/L	0.5	☒
2943	Bromodichloromethane		524.2 ☐		ug/L		☐
2942	Bromoform		524.2 ☐		ug/L		☐
2944	Chlorodibromomethane		524.2 ☐		ug/L		☐
2941	Chloroform		524.2 ☐		ug/L		☐
2251	Methyl-Tert-Butyl Ether (MTBE)	04.26.10	524.2 ☒		ug/L	0.5	☒

Other Information:

Does the system chlorinate its water?	☐ Yes	☒ No
Was the sample dechlorinated at the lab?	☐ Yes	☒ No
Was this information sent to IDEM by the lab?	☒ Yes	☐ No

Preservation Used:

- ☒ Iced
- ☐ Na2S2O3
- ☒ HCl
- ☐ Ascorbic Acid
- ☐ Other: ______

Completed By: ______ Reviewed by: ______

Important Notes:

Alternate Method: ______

- If an alternate approved method (example: 502.2) was used for the analysis, please indicate the alternate method used here:
- If a constituent was below detection limits (i.e., not detected), select "BDL" and enter the method detection level (example: 0.5 ug/L) in the column provided.
- Please make every possible effort to print clearly and inside the lines;
- Return completed form to: Indiana Department of Environmental Management
  Drinking Water Branch - Compliance Section
  100 N Senate Avenue
  Indianapolis, IN 46204-2251