

Operation and Maintenance Agreement  
Superior Fibers, Inc. Property  
NFA Number 03NFA161

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**EXHIBIT 2**  
O&M Plan

**OPERATION AND MAINTENANCE PLAN**  
(Addendum)

**PREPARED FOR:**

**SUPERIOR FIBERS, INC.**  
**499 NORTH BROAD STREET**  
**BREMEN, OHIO 43107**

February 2005

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## 1.0 Introduction

Smalley & Associates, Inc., (SAI) was engaged by Superior Fibers, Inc., (Superior) to prepare a No Further Action (NFA) Letter, including an Operation and Maintenance (O&M) Plan, in accordance with Ohio Revised Code (ORC) Chapter 3746 and Ohio Administrative Code (OAC) 3745-300-15(F), for the "Property" located at 499 N. Broad Street in Bremen, Ohio 43107. Figure 1 in the O&M Plan is a property location map and includes the property coordinates.

An O&M Plan was prepared for inclusion in an Addendum to the NFA Letter for the Property submitted in July 2004. This revised O&M Plan is prepared for inclusion in an Addendum to the NFA Letter for the Property submitted in February 2005. The original NFA Letter was submitted in February of 2003. A complete copy of the NFA Letter, which includes the July 2004 Addendum, the February 2005 Addendum, and the revised O&M Plan is on file with SAI and will be available from the Ohio EPA, Division of Emergency and Remedial Response, Voluntary Action Program (VAP) in accordance with the filing requirements of OAC 3745-300-13(J).

SAI is recommending long-term ground water monitoring at the Property, as discussed in the O&M Plan, to ensure that the Property remains protective of human health and the environment and to verify continued compliance with applicable standards in accordance with OAC 3745-300-15. In addition to the long-term ground water monitoring, the O&M Plan includes a Contingency Plan for Remediation (CPFR). The CPFR consists of a bioremediation system that will be implemented if the ground water monitoring analytical results indicate detections of chemicals of concern (COCs) at or above the method detection limits (MDLs) for each COC in any of the early warning (EW) wells. The EW wells will consist of EW-1, EW-1D, EW-2, EW-2D, EW-3, EW-3D, EW-4, EW-4D, EW-5, EW-5D, EW-6, EW-6D, MW-21, MW-21D, MW-22 and MW-22D as depicted in Figure 2 of the O&M Plan. The EW wells will be placed at the Property within 30 days following approval of the O&M Plan.

## 1.1 Property Description

The Property is located north of the Village of Bremen at the southwest intersection of State Route 664 and State Route 37 in Fairfield County, Ohio.

The facility name:	Superior Glass Fibers
Owned by:	Superior Glass Fibers, Inc.
The address:	499 N. Broad Street Bremen, Ohio 43107
Volunteer:	Superior Glass Fibers, Inc. Phone: (740) 569-4175 Fax: (740) 569-4632

The Property is identified by the Fairfield County Auditor's office as parcel number 035-01287-00 and by the Fairfield County Recorder under Deed# 523/621. The taxing district is Fairfield County, Village of Bremen, Ohio. The land use is listed as light manufacturing. Figure 2 in the O&M Plan identifies the layout and structures of the property.

## **1.2 Background and Property History**

The Property encompasses approximately 32.076 acres of land located near the southwest corner of the intersection of State Route 664 and State Route 37. The Property is situated in a historically farmland area. The Property includes a fiberglass manufacturing plant and farmland. Superior has occupied the Property since the mid 1980s.

The decision to seek a VAP Covenant Not to Sue (CNS) from Ohio EPA was initiated following a routine ASTM Phase 1 and Phase 2 Environmental Site Assessment completed between May and August of 2002. The ASTM Phase 2 Environmental Site Assessment revealed the presence of trichloroethene (TCE) and its breakdown products (e.g., 1, 1-DCE, cis 1, 2-DCE, trans 1, 2-DCE, and vinyl chloride) in the soil and ground water at the Property.

The VAP Phase I Property Assessment included a determination of eligibility for entry into the Ohio VAP, a review of historic and current uses of the Property and surrounding properties, an environmental history review, a review of the history of hazardous substances or petroleum releases and a property inspection and identification of "identified areas" as defined in OAC 3745-300-06(F).

The Certified Professional determined that the Property was eligible for entry into the Ohio VAP on July 16, 2002. The Certified Professional inspected the Property from June 2002 to December 2002, and in March and May 2004.

A VAP Phase II Property Assessment was conducted at the Property from June through December 2002. The Phase II Assessment Report was issued in December 2002. The purpose of the Phase II assessment was to determine if soil and/or ground water on the Property was impacted in the identified areas.

The Phase II assessment included sampling and analysis of soil and ground water at the subject Property, a pathway completeness determination, and determination of applicable standards. This included an assessment of the risks from direct contact to the soils at the Property, construction worker exposure, leaching to ground water, ground water ingestion, soil to indoor air and ground water to indoor air. The complete Phase II Assessment Report is contained in the NFA Letter on file with the Ohio EPA. A summary of the Phase II assessment findings is provided below.

## **1.3 Soil Investigation and Findings**

Soil was investigated by the placement of soil bores. A total of 12 different COCs (e.g., volatile organic compounds or "VOCs") were detected in the soil at the Property. These COCs include acetone, 2-butanone, 1,2,4-trimethylbenzene, benzene, toluene, ethylbenzene, xylene, trichloroethene (TCE), 1,1-dichloroethene, cis 1,2 dichloroethene, trans 1,2-dichloroethene and vinyl chloride. The presence of the majority of these COCs was attributed to the past use of TCE at the Property for cleaning resinous fiberglass from equipment on a pad on the south side of Building #1.

## **1.4 Ground Water Investigation and Findings**

A sand and gravel aquifer was discovered beneath the Property beginning at depths ranging from 17 to 24 feet below surface grade (bsg) and extending to an approximate depth of 61 to 81 feet bsg. The unsaturated zone is comprised primarily of silty clay to an average depth of approximately 17.6 feet. A total of 21 shallow monitoring wells screened on an average range of 17.5 to 25 feet bsg, and 11 deep monitoring wells screened from 30 to 45 feet bsg were advanced into this aquifer to define the horizontal and vertical extent of the ground water contamination beneath the Property.

Ground water samples were collected in the manner prescribed by Ohio VAP and analyzed for relevant COCs. Concentrations of TCE and its breakdown products in ground water underlying the Property exceed unrestricted potable use standards (UPUS) listed in OAC 3745-300-08.

The information provided in the NFA Letter indicates that the contamination has not migrated beyond the Property boundary.

## **1.5 Exposure Pathway Assessment**

An exposure pathway assessment was prepared to evaluate potential exposure to human receptors, current and future, and to identify all other potential exposure pathways associated with the Property. This assessment was developed in accordance with OAC 3745-300-09. The Property is restricted to commercial/industrial land use only, as defined by OAC 3745-300-08(2), Table (c). The following pathways were determined to be complete, and pose a potential risk to human health and/or the environment:

- Direct contact soils – on-property
- Construction worker exposure scenario – on-property
- Ground water ingestion
- Soil to indoor air
- Ground water to indoor air
- Ground water direct contact

The results of ground water sampling indicate that ground water below the Property is impacted with TCE and its associated breakdown products. A Declaration of Use Restrictions will prohibit the extraction or use of the ground water at the Property for any use, potable or non-potable, except for the non-contact process operations associated with manufacturing at the Property, or as necessary for investigation or remediation of the ground water, or in conjunction with construction activities or the installation or maintenance of subsurface utilities.

## **2.0 Determination of Applicable Standards**

COC concentrations detected in the soil at the Property currently meet the generic direct contact standards for commercial/industrial land use, cumulatively adjusted for the presence of multiple chemicals, found in OAC 3745-300-08.

Because ground water contaminants do not currently exceed the UPUS at the property boundary and ground water to indoor air risk goals, cumulatively adjusted with soil direct contact standards, for the Property are met, remedial activities have not been performed to date. The uppermost aquifer is considered "Critical Resource Ground Water," as defined in OAC 3745-300-10(C)(1)(a). The definition states "The ground water is being used by a public water system and is in a drinking water source protection area for a public water system using ground water."

SAI, Superior and Ohio EPA recognize the proximity of the COC plume in ground water on the Property to the Village of Bremen Public Water System (PWS) well field (the well field is located 1280 feet downgradient from the southern property boundary). To ensure continued compliance with VAP applicable standards on and adjacent to the Property, the following sections of this report address the implementation of a long-term ground water monitoring plan and, if necessary, the CPFRR. The CPFRR provided in this O&M Plan will be implemented if COC concentration levels are detected at or above the MDL for any COC in any of the EW wells. All new EW wells will be placed 20 to 30 feet on the Property from the downgradient property boundaries (see Figure 9 in Appendix 13 of the February 2005 NFA Addendum - south and southeast sides of the Property). The CPFRR is described in Section 6 of the O&M Plan.

### **2.1 Implementation of Long-Term Ground Water Monitoring Plan**

The O&M Plan includes the implementation of long-term ground water monitoring activities for the Property to demonstrate compliance with applicable standards. The ground water will be monitored by collecting samples from the wells listed in Table 1 and Table 2 of the O&M Plan, the EW wells (when installed), and the process water wells, PW-1, PW-2 and PW-3. Figure 2 in the O&M Plan displays the location of the wells on the Property. The monitoring will provide a method for verifying continued compliance with applicable standards for the Property and information for evaluation and implementation of contingency requirements. Bore logs for all wells placed at the Property will be submitted under CP affidavit to Ohio EPA.

Thirty-two (32) monitoring wells have been developed at the Property. Twenty (21) of these wells, as listed in Table 1, "Shallow Wells," of the O&M Plan, are capable of monitoring the upper portion of the aquifer (17 to 25 feet bsg). Eleven of these wells, as listed in Table 2, "Deep Wells," of the O&M Plan, are capable of monitoring the lower portion of the aquifer (30 to 45 feet bsg). The three process water wells (listed in Table 2 of the O&M Plan) developed at greater than 35 feet bsg also will be used to monitor the lower portion of the aquifer at the Property.

To date, sampling results of the deep wells at the Property, which include the process water wells (PW-1, PW-2 and PW-3), have not indicated TCE or its associated breakdown products (1,1-DCE, cis 1,2-DCE, trans 1,2-DCE or vinyl chloride) in the lower portion of the aquifer (30 to 45

feet bsg) above the UPUS. Table 1 of the O&M Plan lists the ground water analytical results for samples collected in the shallow wells at the Property (samples were collected June to December 2002, March 2004 and May 2004). Similarly, Table 2 of the O&M Plan lists the analytical results for samples collected in the deep wells at the Property.

## **2.2 Tasks for Operation of the Ground Water Monitoring System**

Each monitoring well installed at the Property will be equipped with a locking cap and protective casing. The integrity of the casing, locking cap and concrete/grout seal will be examined during each sampling event. The majority of the wells are located in a field that has historically been farmed and planted with soybeans and corn. Installing a four-post barrier fencing around each wellhead will protect any well located in the farmed areas of the Property. Wells located in grass areas subject to mowing will be flush mounted. Perimeter wells are nested in pairs screened at two sampling intervals (20 to 25 feet and 30 to 45 feet bsg), respectively. Deep wells are labeled with a final letter "D" (e.g., MW-18D) with the exception of PW-1, PW-2 and PW-3, which are process wells screened greater than 35 feet bsg at the Property. There will be a prohibition on farming if the CPFRR is implemented at the Property.

## **2.3 Maintenance and Preventive Measures**

If damage occurs to any of the monitoring wells at the Property, the following responses as appropriate will occur within 15 days:

- 1) Repair and resealing of the concrete/bentonite seal by over drilling.
- 2) Proper abandonment and redevelopment of a replacement well per Ohio Department of Natural Resources (ODNR) and Ohio EPA guidance.
- 3) Re-sampling of the repaired or replaced well.
- 4) Development of a guardrail around the system to prevent future damage to the well.

Wells will be inspected during each sampling event for cracked and damaged casings, cracked concrete/bentonite seals, and damage to the outer protective casing and locking caps. Wells will be locked at all times except during a sampling event. Well inspection results and any needed repair activity will be documented with each monitoring report.

## **2.4 Operating Conditions and Monitoring Schedule During Routine Sampling Events**

Wells included in Table 1 and Table 2 and the EW wells will be sampled quarterly for the first two years and thereafter semi-annually (subject to the conditions listed in Section 2.5 of the O&M Plan). Monitoring will remain on a quarterly basis if a statistically increasing trend is observed in any well on the Property. Sampling will occur in February, May, August, and November of each calendar year during quarterly events, and May and November during semi-annual sampling events. Any variance from the above schedule or monitoring program will need to be approved by Ohio EPA prior to implementation.

## **2.5 Operating Conditions and Monitoring Schedule During Remediation**

Ground water monitoring will remain on a quarterly schedule during any active remediation at the Property. Quarterly sampling will continue for at least two years after the completion of active remediation (i.e., if the CPFR is triggered) to determine if rebounding of COC concentrations will occur. After the two years of quarterly sampling following active remediation, the frequency will be reduced to semi-annual sampling if no statistically increasing trend is observed in any well on the Property. Any variance from the above schedule or monitoring program will need to be approved by Ohio EPA prior to implementation.

In addition to the quarterly ground water monitoring schedule, more frequent monitoring may be conducted as necessary to evaluate the physical, geochemical, and hydrogeologic conditions necessary for effectiveness of the remedial action. The results of such monitoring will be included in the monitoring reports submitted to the Ohio EPA in accordance with OAC 3745-300-15(F)(2)(a)(i).

## **2.6 Data Collection**

During each ground water sampling event, ground water elevations will be measured for the wells listed in Table 1 and Table 2 of the O&M Plan, and for the EW wells and process water wells. A potentiometric ground water surface map depicting ground water flow direction and ground water elevation contours will be developed for each sampling event. A well integrity survey as described in Section 2 of the O&M Plan will be completed during each sampling event. All samples will be analyzed for VOCs by a VAP certified laboratory. Turbidity, oxidation-reduction potential (ORP), pH, conductivity and temperature will be recorded for each well during each sampling event. Additionally, dissolved oxygen (DO) and chloride will be field analyzed for the first year (i.e., four quarters) of sampling events.

A report describing the activities will be completed for each sampling event. All reports will include the analytical data from the VAP certified laboratory. Ground water sample analytical results will be reported with respect to the laboratory assigned MDLs and practical quantitation limits (PQLs). Reporting limits (RLs) may be used in place of PQLs if the laboratory does not use PQLs. MDLs and PQLs (or RLs) must be capable of detecting concentrations of COCs on the Property at or below applicable standards in accordance with OAC 3745-300-07(E)(1)(b). The reports will be submitted to Ohio EPA semi-annually while maintaining a quarterly monitoring schedule, and the reports will be submitted annually while maintaining a semi-annual monitoring schedule. SAI Standard Operating Procedures for ground water monitoring and sampling are included in Appendix 13 of the February 2005 NFA Addendum.

## **2.7 Evaluation of Sampling Results**

The intent and purpose of evaluating each sampling event is to demonstrate that applicable standards are being met at the property boundary with respect to ground water, to examine increases or decreases in COC concentrations to ascertain the effect on pathway analysis, to determine seasonal fluctuation and influence on ground water and COC movement, and to assure that the Property remains protective overall of human health and the environment. If COCs

reach the EW wells at any detectable concentration at or above the MDLs for each COC, then the CPFRR will be implemented as described in Sections 6.0 through 6.4 of the O&M Plan.

A trend analysis, e.g., Sen's Test and/or Mann Kendall Test, as described in Statistical Methods for Ground Water Monitoring (1994) by Robert D. Gibbons will be completed for each sampling event following the eighth sampling event to determine if a decreasing or increasing trend is occurring at the Property. The trend analysis will serve as guidance for continued quarterly ground water monitoring. If a COC detection occurs and the confirmatory sample does not indicate a statistical increase, then only the validated sample results shall be included in the analysis. Also, if a duplicate sample is collected and analyzed, only the result of the higher concentration sample (i.e., duplicate or original sample) will be used in the analysis. The PQL or RL will be the trigger to indicate a significant increase in non-detect samples or samples with detected concentrations between the MDL and the PQL or RL.

### **3.0 Monitoring Reports**

The semi-annual reports will be submitted to Ohio EPA within 30 days of completion of the May and November sampling events. The annual reports will be submitted to Ohio EPA within 30 days of completion of the November sampling event. The reports will include the following:

- 1) Results in table format of all sampling analytical values of COCs in the ground water. Results will be reported with respect to the MDL and the PQL (or RL) of each COC.
- 2) Potentiometric ground water elevation maps from each event.
- 3) Updated ground water contamination plume maps for each COC.
- 4) Copies of routine maintenance documents for well repair and replacement or repair to bio-fluid feed pipes if the CPFRR is triggered for the Property.
- 5) Copies of all laboratory analytical data reports and VAP laboratory certification affidavits. The MDLs, PQLs, and/or RLs used by the VAP certified laboratory will be included with the laboratory analytical reports.
- 6) Interpretation of analytical results and recommendations.
- 7) Copies of log sheets from property visits.
- 8) COC trend analysis reports.
- 9) Summary of operational modifications such as additional monitoring well placement or changes to the remediation system if the CPFRR is triggered for the Property.
- 10) A summary of the effectiveness of the remedial activities if the CPFRR is triggered for the Property and active remediation evaluation reports.
- 11) An affidavit from the responsible party(s) with responsibility for the O&M Plan, including the CPFRR (if the CPFRR is triggered for the Property), and other persons with knowledge, attesting that all information for the given reporting period has been submitted, and that the information is truthful, accurate and complete.

Special written notification will be provided to Ohio EPA in addition to the semi-annual and annual reports if:

- 1) COCs are detected at or above the MDL in the EW wells.
- 2) Well repair, replacement or abandonment is completed at the Property.

- 3) COCs are detected in any of the process water wells at the Property.
- 4) The CPFRR or any other remedial activities are implemented. Written notification will be provided to Ohio EPA prior to implementation of any remedial activities.

#### **4.0 Declaration of Use Restrictions**

The Property is subject to a Declaration of Use Restrictions (Declaration) recorded in the Fairfield County Recorder's Office on December 3, 2004. A copy of the Declaration is included in Exhibit 1, "Property Legal Description," to the O&M Agreement. The Declaration prohibits the extraction or use of the ground water at the Property for any use, potable or non-potable, except for the non-contact process operations associated with manufacturing at the Property, or as necessary for investigation or remediation of the ground water, or in conjunction with construction activities or the installation or maintenance of subsurface utilities. The ground water can be used for non-contact processes associated with the manufacturing operations at the Property, but only from the three existing process water wells (PW-1, PW-2 and PW-3) located outside the area of ground water contamination. The relocation or installation of additional process water wells for any purpose at the Property can only be completed with prior approval from Ohio EPA.

#### **5.0 Ground Water to Indoor Air Pathway Evaluation**

Ground water COC concentrations will be modeled for the risks and hazards associated with the volatilization to indoor air pathway for occupied structures on the Property utilizing the most current version of the Johnson and Ettinger (J&E) model. The modeling will be conducted after each ground water sampling event. The incremental risk and hazard will be calculated for each COC and summed for the indoor air pathway. Site-wide risks for the Property, including the contribution from the volatilization to indoor air and soil direct contact pathways, should not exceed the applicable risk goals in accordance with OAC rule 3745-300-09(C).

##### **5.1 Plan to Maintain Compliance with Ground Water to Indoor Air Pathway Risk Goals**

If the risks at the Property for the volatilization to indoor air pathway summed with the risks associated with the soil direct contact pathway exceed the applicable risk goals as defined in OAC 3745-300-09(C)(1), the Volunteer shall implement one or more of the following contingencies upon approval by Ohio EPA:

- 1) Conduct air monitoring for each occupied structure on the Property and compare each COC to target indoor air concentrations as calculated utilizing the J&E model, considering the presence of multiple chemicals. Air monitoring will be completed monthly until the applicable risk goals are achieved for the Property; and/or
- 2) Assess the subsurface soil gas directly beneath the occupied buildings.

Then, if indoor air monitoring or soil gas indicates that the applicable risk goals are exceeded for occupied structures, one or more of the following contingent remedies shall be implemented upon approval by Ohio EPA:

- 1) Implement the CPFR to reduce the concentration of COCs in ground water so that the applicable risk goals are met; and/or
- 2) Increase the building ventilation rate to achieve compliance with the applicable risk goals for indoor air. (Current ventilation rates must be established within 30 days of approval of the CNS). Furthermore, the contingent remedy requiring ventilation adjustment must remain effective as long as ventilation rates are relied upon at the Property to meet applicable standards; and/or
- 3) Install sub-slab vapor ventilation systems.

## **6.0 CPFR Triggers for Ground Water**

If COCs are detected in the ground water from any of the EW wells at or above the MDL, then the following measures will be completed by the Volunteer or property owner:

- 1) Notify the Ohio EPA both verbally and in writing that confirmatory sampling will occur within 15 days upon receipt of the analytical results that indicated the initial detection of COCs at or above the MDL. The laboratory turn around time for reporting the analytical results will not exceed 15 days.
- 2) Upon confirmation of any COCs at or above the MDL detected in any of the EW wells, the Volunteer or property owner will implement the CPFR. The CPFR, under these conditions, will be fully implemented within 45 days of receiving the confirmatory laboratory analytical results.

If confirmatory samples indicate COC concentrations below MDLs, then the initial detection will be considered a false positive and will not necessarily trigger the CPFR.

A "J" qualified analytical result for a COC detected between the MDL and the PQL (or RL) is an actual detection. Therefore, "J" qualified analytical results from an original detection of COCs in ground water at any of the EW wells and/or as a confirmatory ground water sample can trigger implementation of the CPFR.

In addition to the measures listed above, the Volunteer has the authority to implement the CPFR at any time, with prior approval from Ohio EPA. Ohio EPA also may require implementation of the CPFR at any time.

### **6.1 Description and Operation of the Bioremediation System Associated with the CPFR**

Bioremediation (i.e., bioaugmentation) is the primary contingency treatment method proposed under the CPFR. The CPFR will be implemented by first obtaining a Class V injection well permit exemption from the Ohio EPA, Division of Drinking and Ground Waters, Underground Injection Control Unit, in accordance with OAC 3745-34.

### **6.1.1 Bioremediation System Construction**

The bioremediation system will consist of an array of bio-fluid feed pipes (BFFPs) that extend 20 feet beyond the horizontal outer limits of the interpolated contamination ground water plume. If the COC detections that trigger the CPFRR are discovered in the shallow wells at the Property, each BFFP will extend to a total depth of 25 feet bsg and will be screened to the top of the seasonal high water table. If the COC detections that trigger the CPFRR are discovered in the deep wells at the Property, then the BFFPs will extend to the maximum detected depth of the contamination in feet bsg and will be screened to the top of the seasonal high water table. Additional deep wells may be required to determine this maximum depth of contamination.

Each BFFP will be constructed with 4-inch diameter PVC Schedule 40 pipe. The screened interval will be 50 slot PVC pipe. The bore hole for placement of the BFFP will be 10 inches (drilled with a hollow-stem auger) in diameter with the appropriate screen pack material. Each BFFP will be grouted to the surface and extend 2 to 3 feet above grade. A cap will be placed on each BFFP. The array of BFFPs will be installed 20 feet on center in staggered rows as depicted in Figure 3 of the O&M Plan. This arrangement will provide a 10-foot radial zone of influence around each BFFP. Normal head pressure and natural infiltration will be sufficient to accomplish addition of pressure to the delivery point. The total length of each BFFP will be measured prior to injection with the bacterial solution or nutrients to determine if sedimentation has occurred in the BFFP. If portions of the well screen are occluded due to sedimentation, then development may be required to ensure injections can occur through the entire length of the BFFP well screen.

Monitoring wells currently at the Property will not be used for injection wells. They will be used for ground water monitoring purposes only.

### **6.1.2 Bacterial Solution**

The BFFPs will be injected with a bacterial solution (bacteria and nutrients) consisting of certified pathogen-free microbes (*pseudomonas putida*) mixed with a co-substrate of dextrose and other nutrients as necessary. The injections will begin 25 feet downgradient of the leading edge (southeast or south) of the ground water contaminant plume in clean ground water and progress to the upgradient source area (northwest) to avoid the displacement of contaminated ground water across the property boundary.

The bacterial solution will be supplied by CL-Solutions. References and case histories provided by CL-Solutions are enclosed in Appendix K of the July 2004 NFA Letter Addendum. An alternative bacterial solution may be selected with prior approval from Ohio EPA.

Typically, one gallon of the bacterial solution with a concentration of microbes at  $1 \times 10^6$  will treat 1000 gallons of contaminated ground water. However, the supplier recommends that the initial dose should be one gallon to 500 gallons of ground water.

### **6.1.3 Ground Water Condition Requirements for the Bacterial Solution**

The only ground water condition requirements stated by CL-Solutions prior to treatment are listed in Appendix K of the July 2004 NFA Letter Addendum and include the following:

- 1) pH values in the range of 5.0 to 9.0.
- 2) Temperature in the range of 55 to 95 degrees F.
- 3) Salinity < 5%.
- 4) DO in the range of 1 - 8 part per million (ppm).
- 5) ORP > 0.00.

In Appendix K of the July 2004 NFA Letter Addendum is a DO map showing that DO, with the exception of the highest COC portions of the ground water contaminant plume (i.e., MW-11, MW-19, MW-20, MW-23, and MW-25), are within range for use of the bacterial solution. An injected oxygen donor will be required for the area of the contaminant plume where DO is less than one ppm (the supplier recommends calcium permanganate).

The pH, ORP, DO, conductivity and temperature will be checked prior to and during the treatment process. Table 3 of the O&M Plan lists additional parameters that will be checked to determine if adjustments need to be made to the treatment process. Table 3 also lists the appropriate test method for these parameters. The ground water pH, ORP, DO and nitrate/nitrite concentrations will be field validated prior to supplementing the bacterial solution with the proper nutrients.

### **6.1.4 Bioremediation System Implementation and Maintenance**

The BFFPs will be placed at the Property and the bacterial solution will be injected within 45 days of the determination of the need for remediation as described in Section 6.0 of this O&M Plan. The BFFPs will be maintained at the Property during active remediation.

During remedial activities, all BFFPs will be inspected monthly for damage and repaired as needed.

The aesthetic quality of the ground water (including biological oxygen demand) will be evaluated as part of the monitoring plan following implementation of the CPFR to examine the effect of the remediation on downgradient water quality. A polishing step may be implemented if necessary to maintain ground water quality downgradient of the Property.

## **6.2 Evaluation of the Effectiveness of the Bioremediation**

If the active remediation system (i.e., CPFR using bioaugmentation) has not met the bioremediation goals or COC concentrations are not decreasing as determined by the statistical analysis test listed and described in Section 2.7 (e.g., Sen's Test or Mann Kendall Test) by the third quarter of bioremediation, then the remediation method shall be deemed ineffective and an alternative remediation method will be implemented at the Property. If the Volunteer or the Ohio EPA determine that the implemented contingency is ineffective, an alternative or

supplemental remediation method, approved by Ohio EPA, will be implemented within 45 days of the determination.

### **6.3 Criteria for Termination of Bioremediation**

Before termination of bioremediation can be considered at the Property, a demonstration must be made that any COCs in the ground water are below MDLs at the EW wells and meet the UPUS throughout the Property for a minimum of three consecutive quarterly sampling events. Termination of remedial activities can only occur with prior Ohio EPA approval.

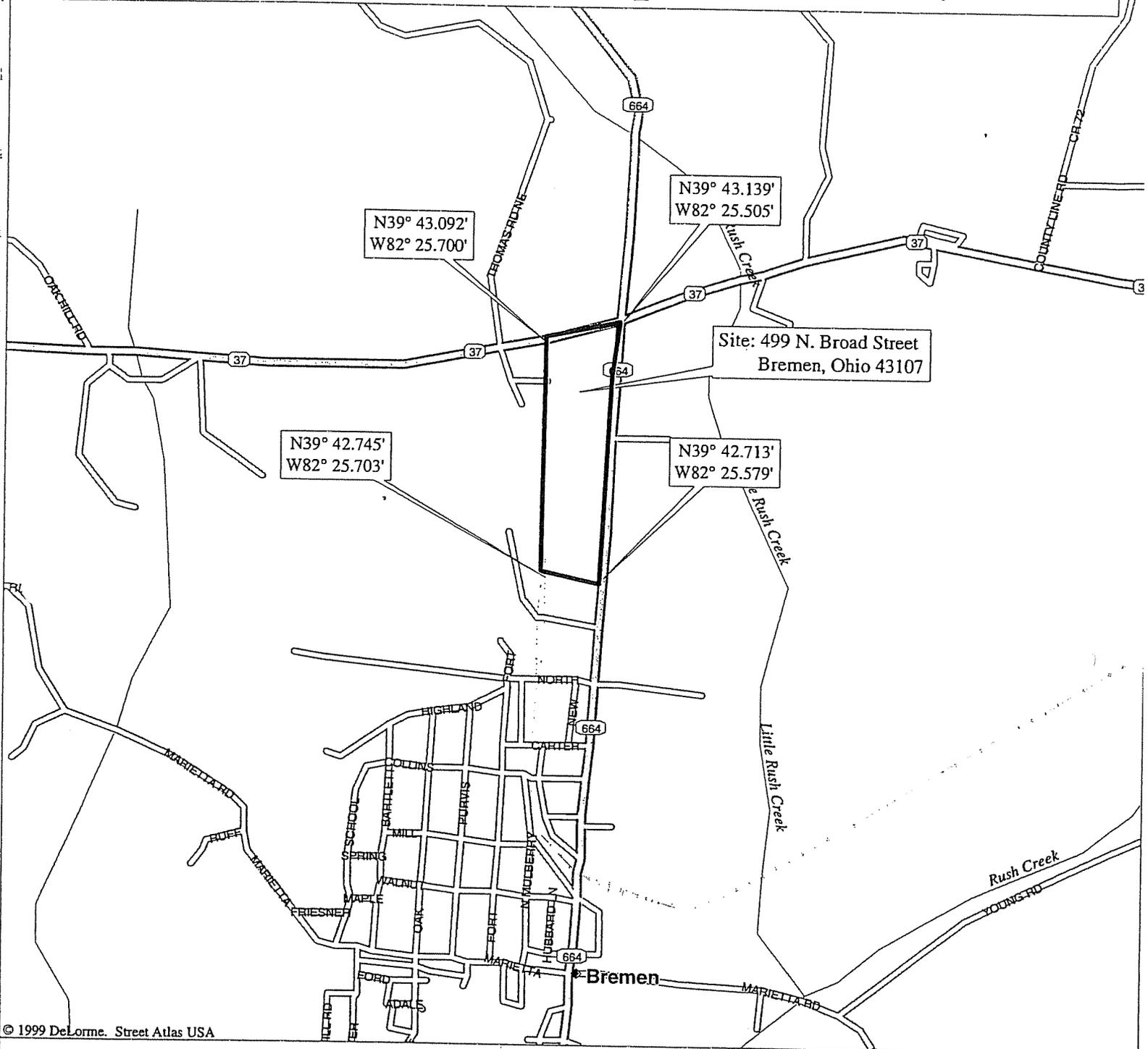
Upon termination of bioremediation, the BFFPs will be properly abandoned, and well sealing reports will be submitted to ODNR (with copies to Ohio EPA). The BFFPs will be abandoned by over-drilling to the depth equal to the bottom of the BFFP with a hollow stem auger. The borehole will be grouted shut on retraction of the hollow stem according to the procedures detailed in the Ohio EPA's *Technical Guidance Manual for Hydrogeologic Investigations and Ground Water Monitoring* (1995).

### **7.0 Criteria for Termination of Long-Term Ground Water Monitoring**

In order to terminate monitoring of the ground water at the Property, the following conditions must be met:

- 1) Ground water monitoring must be conducted for a minimum period of five years at the Property.
- 2) A minimum of two years of quarterly monitoring must be completed with no detections of COCs in any of the EW wells. Furthermore, there must be no statistically increasing trends to the 0.05 level of significance in any well on the Property.
- 3) The Volunteer or property owner must obtain approval from Ohio EPA prior to termination of the ground water monitoring.

# Figure 1. Site Map: Superior Fibers, Inc.



© 1999 DeLorme. Street Atlas USA

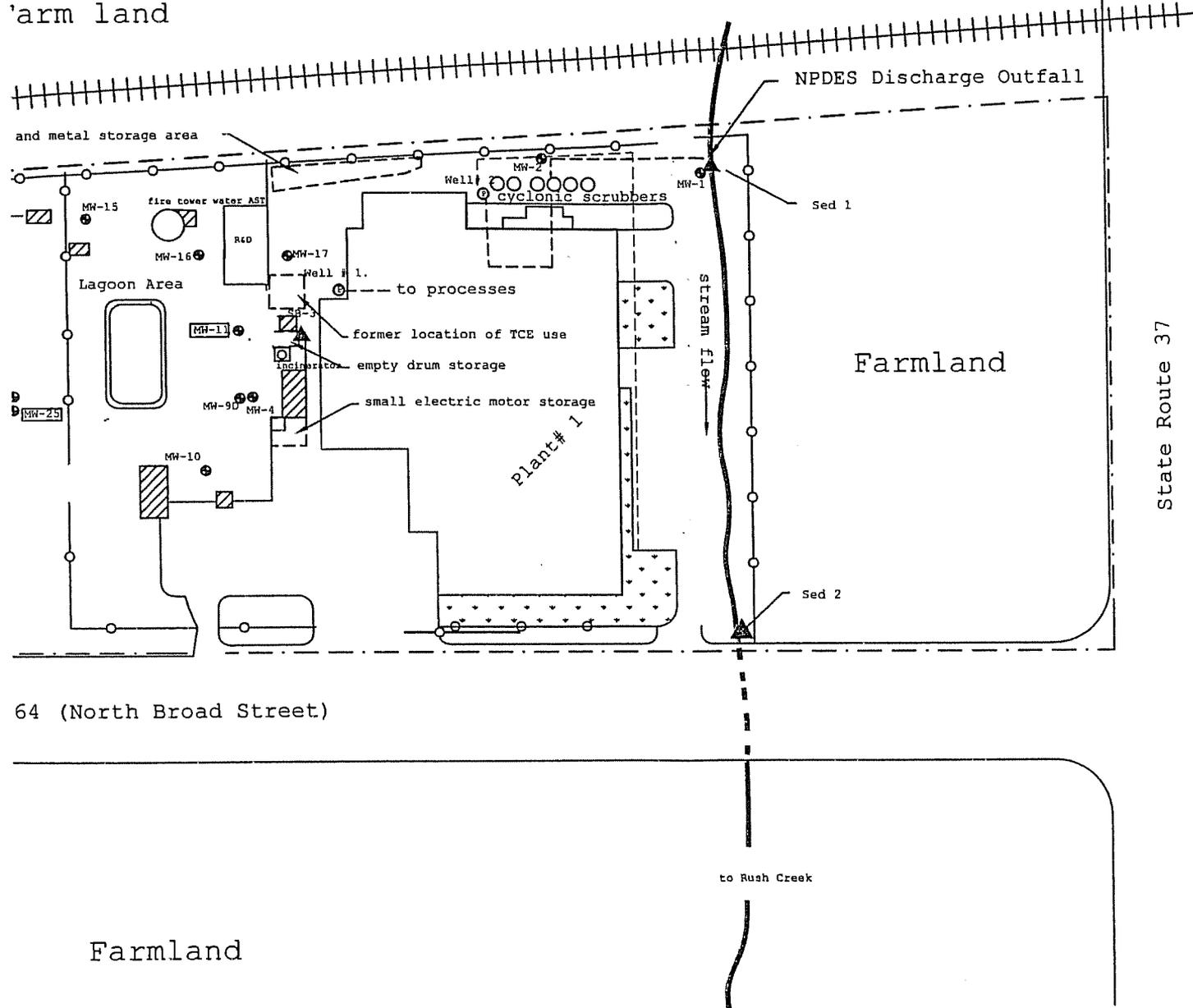
Mag 15.00  
 Wed Feb 16 11:12 2005  
 Scale 1:15,625 (at center)

1000 Feet

Meters

-  Local Road
-  State Route
-  Railroad
-  Small Town
-  River/Canal
-  Intermittent River

farm land



**FIGURE 2. Early Warning Wells**  
 Superior Fibers (EW-Series) and circled wells  
 499 N. Broad St.  
 Bremen, Ohio 43107

▲ Soil Bore or Sediment sample (as marked)  
 ● Monitoring Well  
 ----- water line  
 - - - - - natural gas line  
 ⊕ Production Well

**DRAWING BY: SMALLEY & ASSOCIATES**  
 5705 LITHOPOLIS ROAD, NW  
 LANCASTER, OHIO 43130  
 (740) 654-0112

DATE: 2/25/2005

0

Vacant

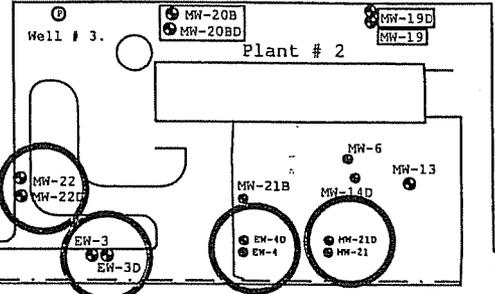
Scrap equipm



Residential

Cornfield

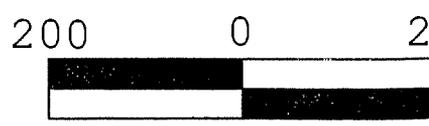
Cornfield

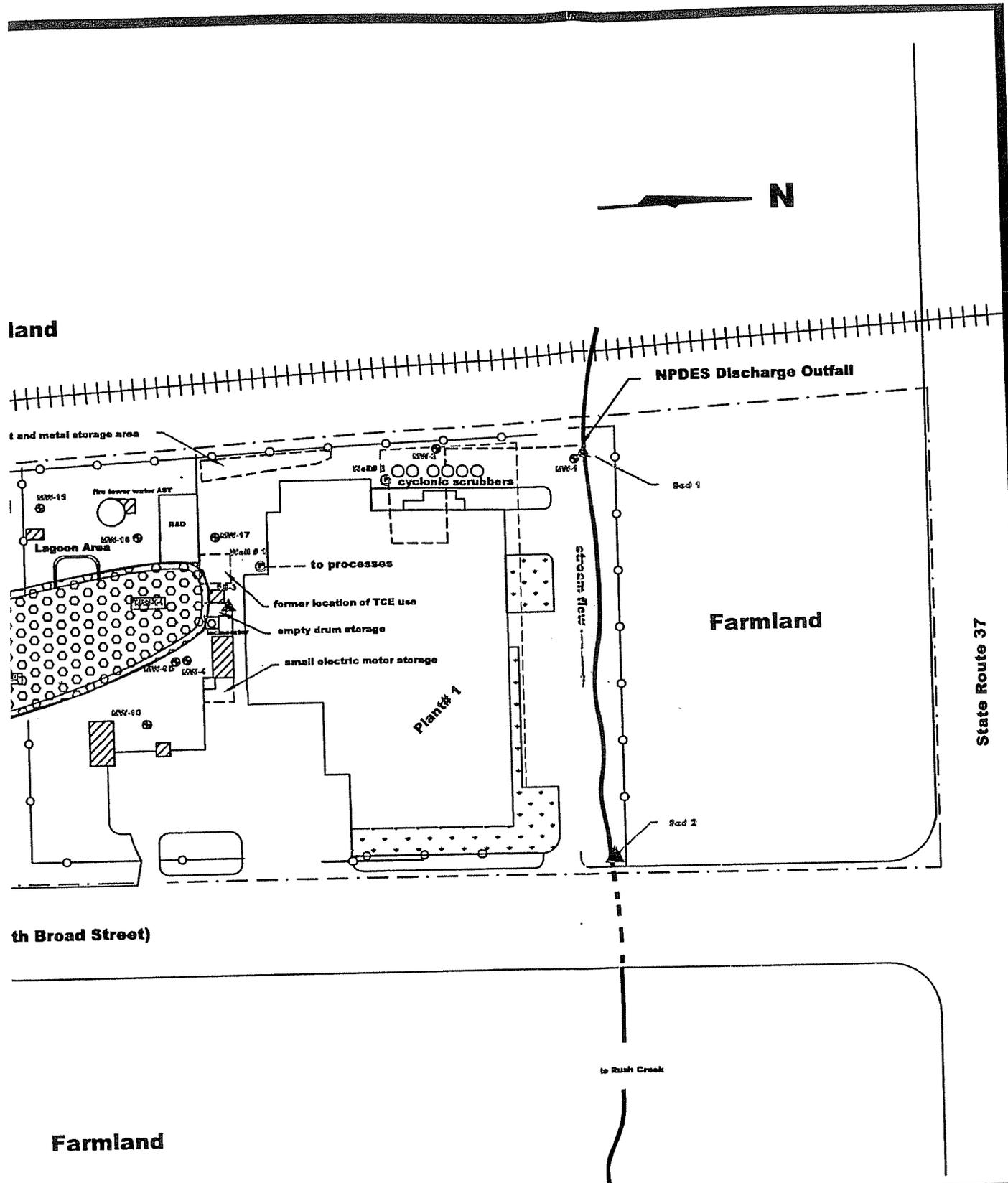


Cornfield



State Route





**FIGURE 3. Example Bio-Fluid Feedpipe Array  
COC in Groundwater**

**Superior Fibers  
499 N. Broad St.  
Bremen, Ohio 43107**

**DRAWING BY: SMALLEY & ASSOCIATES  
5705 LITHOPOLIS ROAD, NW  
LANCASTER, OHIO 43130  
(740) 654-0112**

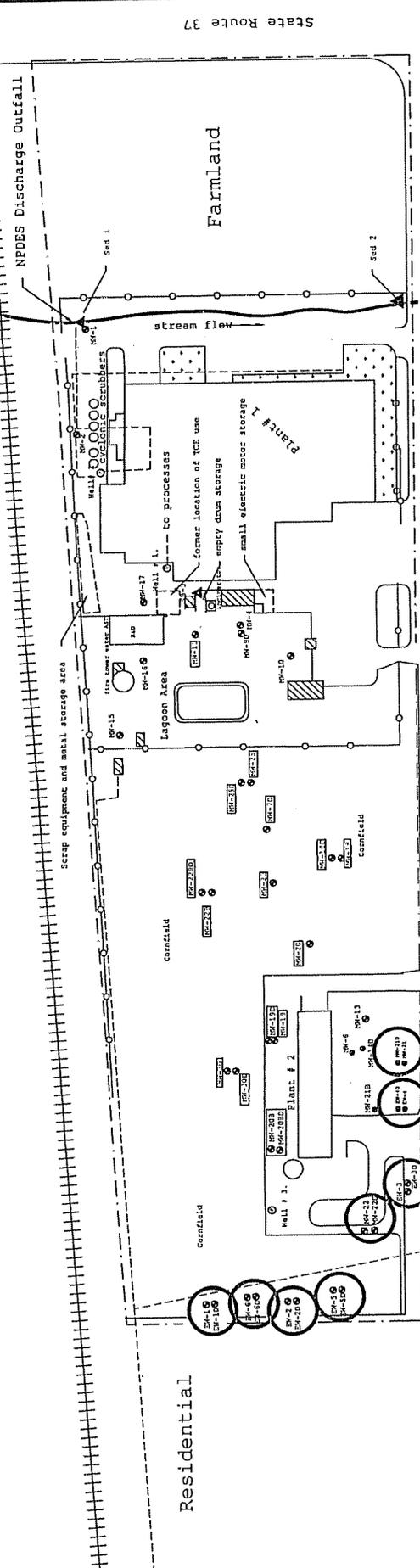
**DATE: 5/7/2004  
REV. DATE: 1/18/2005**

- ▲ Soil Bore or Sediment sample (as marked)
- ⊙ Monitoring Well
- water line
- natural gas line
- Ⓟ Production Well





Vacant Farm land



State Route 664 (North Broad Street)

to Bush Creek

Farmland

**FIGURE 2. Early Warning Wells**  
 Superior Fibers (EW-Series) and circled wells  
 499 N. Broad St.  
 Bremen, Ohio 43107

**DRAWING BY: SMALLEY & ASSOCIATES**  
 5705 LITHOPOLIS ROAD, NW  
 LANCASTER, OHIO 43130  
 DATE: 2/25/2005  
 (740) 654-0112

▲ Soil Bore or Sediment sample (as marked)  
 ● Monitoring Well  
 --- water line  
 - - - - - natural gas line  
 ⊕ Production Well





Vacant Farm land

Farmland

Residential

State Route 664 (North Broad Street)

Farmland

NIPDES Discharge Outfall

Spring equipment and metal storage area

to process

former location of TCE use

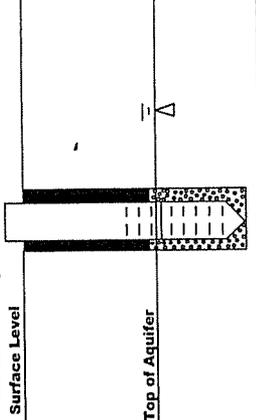
empty drum storage

small electric motor storage

to process

### Feedpipe Sideview

4" PVC Feedpipe with Fifteen Foot Screen  
Screened interval is 10 feet below the water table and  
9 feet above the top of the water table.



Top of Aquifer

Average depth to bottom of Groundwater Contamination = 27.5 feet  
COC Plume thickness = 27.5' - 17.5' = 10 feet (3.048 meters)



**FIGURE 3. Example Bio-Fluid Feedpipe Array  
COC in Groundwater**

Superior Fibers  
499 N. Broad St.  
Bremen, Ohio 43107  
DRAWING BY: SMALLEY & ASSOCIATES  
5705 LITHOPOLIS ROAD, NW  
LANCASTER, OHIO 43130  
(740) 654-0112

Soil Bore or Sediment sample (as marked)  
Monitoring Well  
water line  
natural gas line  
Production Well  
DATE: 5/7/2004  
REV. DATE: 1/18/2005

Table 1. Shallow Wells		Wells Screened 11 to 25 ft. bsg		COCs Per EPA Test Method 8260B in ug/L		
Well Name	Date	TCE	1,1DCE	cis DCE	trans DCE	Vinyl Chloride
MW-1	6/10/2002	<5	<5	<5	<5	<5
	10/23/2002	<5	<5	<5	<5	<5
	2/3/2005	<5	<5	<5	<5	<5
MW-2	6/10/2002	<5	<5	<5	<5	<5
	12/16/2002	<5	<5	<5	<5	<5
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-4	6/10/2002	9	<5	21	<5	5
	10/23/2002	6	<5	97	<5	5
	11/21/2002	8	<5	22	<5	<5
	3/15/2004	<5	<5	<5	<5	<2
	5/7/2004	<5	<5	<5	<5	<2
	2/3/2005	<5	<5	<5	<5	<2
MW-6	6/10/2002	6	<5	630	53	<5.0
	10/23/2002	<5	<5	440	37	2.7J
	11/21/2002	9	<5	680	68	<5.0
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-10	7/25/2002	<5	<5	40	<5	<5.0
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2
MW-11	7/25/2002	2500	8	1800	43	89
	11/27/2002	4300	<5	3400	16	690
	3/15/2004	3700	14	2200	23	180
	5/7/2004	4400	<20	1800	<20	240
	2/3/2005	4400	<5	1700	6.3J	170
MW-13	7/25/2002	<5	<5	270	17	<5.0
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2
MW-15	8/29/2002	<5	<5	<5	<5	<5.0
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-16	8/29/2002	<5	<5	<5	<5	<5.0
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2
MW-17	8/29/2002	<5	<5	26	<5	<5
	12/16/2002	<5	<5	<5	<5	<5
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-18	8/29/2002	<5	<5	<5	<5	<5.0
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2
MW-19	8/29/2002	46	<5	34	<5	<2.0
	10/23/2002	17	<5	25	<5	<2.0
	3/15/2004	12	<5	16	<5	<2.0
	5/7/2004	24	<5	14	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0

Table 1. Shallow Wells		Wells Screened 11 to 25 ft. bsg		COCs Per EPA Test Method 8260B in ug/L		
Well Name	Date	TCE	1,1DCE	cis DCE	trans DCE	Vinyl Chloride
MW-20	8/29/2002	<5	<5	820	45	23
	11/27/2002	<5	<5	520	32	89
	3/15/2004	<5	<5	8	<5	49
	5/7/2004	<5	<5	11	<5	17
	2/3/2005	<5	<5	110	1.9J	15
MW-20B	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-21	8/29/2002	<5	<5	46	<5	<5.0
	10/23/2002	<5	<5	<5	<5	<5.0
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2
MW-21B	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2
MW-22B	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-23	11/21/2002	16	<5	1400	85	110
	3/15/2004	23	<5	1400	97	34
	5/7/2004	29	<5	1600	66	29
	2/3/2005	22	<5	1300	55	35
MW-25	11/21/2002	71	9	4000	170	580
	3/15/2004	280	<5	910	57	<2.0
	5/7/2004	220	<5	440	16	<2.0
	2/3/2005	280	<5	710	22	4.6
MW-30	3/15/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
EW-1	2/3/2005	<5	<5	<5	<5	<2.0
EW-2	2/3/2005	<5	<5	<5	<5	<2.0
EW-3	2/3/2005	<5	<5	<5	<5	<2.0
EW-4	2/3/2005	<5	<5	<5	<5	<2.0

TABLE 2. Deep Wells<sup>(1)</sup>

Wells Screened 30 to 45 ft. b		COCs Per EPA Test Method 8260B in ug/L				
Well Name	Date	TCE	1,1DCE	cis DCE	trans DCE	Vinyl Chloride
PW-1	11/27/2002	<5	<5	<5	<5	<5.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
PW-2	8/29/2002	<5	<5	10	<5	<5.0
	11/27/2002	<5	<5	<5	<5	<5.0
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
PW-3	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-7D	7/25/2002	<5	<5	<5	<5	<5.0
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-9D	7/25/2002	<5	<5	<5	<5	<5.0
	12/16/2002	<5	<5	<5	<5	<5.0
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-14D	7/25/2002	<5	<5	<5	<5	<5.0
	12/16/2002	<5	<5	<5	<5	<5.0
	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-18D	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-19D	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-20BD	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-21D	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-22D	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-22BD	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-25D	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
MW-30D	3/15/2004	<5	<5	<5	<5	<2.0
	5/7/2004	<5	<5	<5	<5	<2.0
	2/3/2005	<5	<5	<5	<5	<2.0
EW-1D	2/3/2005	<5	<5	<5	<5	<2.0
EW-2D	2/3/2005	<5	<5	<5	<5	<2.0
EW-3D	2/3/2005	<5	<5	<5	<5	<2.0
EW-4D	2/3/2005	<5	<5	<5	<5	<2.0

<sup>(1)</sup>Each well is screened at a minimum of 5 feet across the aquifer. PW-1, PW-2 and PW-3 are screened greater than 35 feet below surface grade.

<sup>(2)</sup>The EW-Series of wells, following installation, will be added to Table 1 and Table 2 wells as part of the long term monitoring plan.

**Table 3. Bioremediation Sampling Parameters (Aerobic Cometabolization)**

<b>Sampling Parameters</b>	<b>Test Method</b>	<b>Indication of Effectiveness</b>
<b>Contaminants:</b>		
VOCs	EPA 8260B	Reduction of Concentration
<b>Nutrients:</b>		
Ammonia Nitrogen	EPA 350.2	NA
Ortho Phosphorus	EPA 365	NA
Nitrate	EPA 353.2	NA
Nitrite	EPA 353.2	NA
<b>Electron Acceptors:</b>		
Iron	SM 3500FE-D	No iron reduction
Sulfate	EPA 300	No sulfate reduction
Dissolved Oxygen (DO)	EPA 360.1	Aerobic conditions > 1 ppm
<b>By-Products:</b>		
Methane	RSK 175	No Increase
Carbon Dioxide*	SM 4500-C	Increase
Ethene/Ethane	RSK 175	No Increase
Chloride	Titration	Increase
Microbial Plate Count	supplier	Optimum

\* Carbon dioxide concentrations (as a measure of bioremediation effectiveness) may be influenced by naturally occurring carbon dioxide. Concentrations of dissolved carbon dioxide have been observed in the Village of Bremen PWS wells.

Operation and Maintenance Agreement  
Superior Fibers, Inc. Property  
NFA Number 03NFA161

---

**EXHIBIT 3**  
Financial Assurance

**National City**

RECEIVED

MAR 16 2005

OHIO EPA/CDO

To Dennis  
Fr Keith Hughes

Certificate Of Deposit Receipt

Account No. 9560068936

Depositor #1

SUPERIOR FIBERS INC

Depositor #2

Certificate Type

Retail

Retirement

Rate Type

Fixed Rate

Variable Rate

Date 1/06/2005

Amount \$ 15,000.00

Maturity Date 7/06/2007

Interest Rate 3.39 %

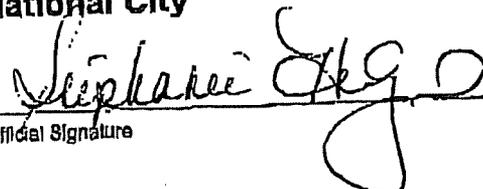
Term 30 Months

Annual Percentage Yield 3.45 %

Interest Payment Method Remain In Account

National City

Official Signature



Subject to the terms and conditions of Bank's Time Deposit Account Agreement and Pricing Schedule as in effect from time to time. A penalty will be imposed for early withdrawal.

NON-NEGOTIABLE AND NON-TRANSFERABLE TIME DEPOSIT

Member FDIC

(1/17/02) DA00810H



State of Ohio Environmental Protection Agency

---

**MEMORANDUM**

**TO:** Shelley Wilson, Administrator, Tax Equalization Division, Dept. of Taxation  
Daryl Hennessy, Manager, Office of Tax Incentives, Dept. of Development

**FROM:** <sup>JPK</sup> Joseph P. Koncelik, Director, Ohio Environmental Protection Agency

**DATE:** MAR 22 2005

**RE:** Covenant Not to Sue Issued to Superior Fibers, Inc. for the  
Superior Fibers, Inc. Property

---

As Director of the Ohio Environmental Protection Agency, I certify that Superior Fibers, Inc. has performed investigational and remedial activities at the property listed below and has been issued a Covenant Not to Sue under the authority of Ohio Revised Code (ORC) Chapter 3746. This information is being provided in satisfaction of ORC 5709.87(B).

Property name: Superior Fibers, Inc.

Property address: 499 North Main St., Bremen, Ohio 43107

Property Owner's address: 499 North Main St., Bremen, Ohio 43017

Parcel number(s): 035-01287-00

County: Rush Creek Township, Fairfield County

Taxing District: Tax District Number 35, Fairfield Union School District  
Bremen Corporation

Date Covenant Not to Sue Issued: MAR 22 2005

Attached, for your information, is a copy of the legal description and a site map of the property.

If additional information regarding the property or the voluntary action is required, I suggest you first contact Dennis Smalley, the Certified Professional for the property, at (740) 654-0112. In the alternative, you can contact Michael Ebner with the Ohio Environmental Protection Agency at (614) 728-3778.

**cc:** Bill Miller, Superior Fibers, Inc. 499 North Main St., Bremen, Ohio 43107  
Dennis Smalley, Smalley & Associates, Inc., 5705 Lithopolis Rd., Lancaster, Ohio 43130  
Barbara Curtiss, Fairfield County Auditor, 210 East Main Street, Lancaster, Ohio 43130  
Amy Yersavich, VAP Manager  
DERR-CO, VAP Files Superior Fibers NFA

# LEGAL DESCRIPTION

## EXHIBIT A

- I. And being a part of the Northeast Quarter of Section 16, Township 16, Range 17, beginning at a stone at the Northeast corner of Section 16; thence South 1903.45 feet to a point in State Route No. 664; thence North 89° West 526.11 feet (passing an iron pin at 30 feet) to an iron pin on the East boundary of T. & O. C. Railroad right of way; thence North 2° 44' West 1898.96 feet on East boundary of T. & O. C. Railroad right of way to an iron pin on North Section line; thence South 89° 47' East 616.68 feet on the Section line to the place of beginning containing 24.916 acres, more or less and subject to all legal road right of ways.

Grantor claims title by deed of conveyance recorded in Deed Book 327, page 411, Recorder's Office, Fairfield County, Ohio.

- II. Being in the Southeast corner of Section 9, Township 16, Range 17 and bounded as follows: Bounded on the North by State Route 37, on the East by the section line which is the boundary of Sections 9 and 10 lying on the property line of State Route 664. Bounded on the South by the section line which is the boundary between Sections 9 and 16 lying on the property line formally known as County Road No. 47. Bounded on the West by the East boundary of the right of way of the New York Central Railroad. Beginning at a spike nail on the Southwest corner 'A' at the intersection of the Eastern boundary of the railroad right of way and the section line common to Sections 9 and 16. Thence with the said right of way N. 3° 51' E. (magnetic bearing, true bearing N. 2° 36' E.) for a distance of 411 feet to corner 'C', thence with the property line of State Route 37 bearing N. 81° 20' 30" E. a distance of 662 feet to corner 'D' which is the intersection of the property line of State Route 37 with that of State Route 664 the latter lying on the section line common to Sections 9 and 10. Thence S. 5° 23' 48" W. with the property line of State Route 664 and the section line common to Sections 9 and 10 a distance of 587 feet to corner 'G' the intersection of the property lines of State Route 664 and formerly known as County Road 47 being also the intersection of the section lines common to Sections 9 and 10 and common to Sections 9 and 16 respectively. Thence with the property line of formerly known as County Road 47 which is on the section line common to Sections 9 and 16 bearing N. 83° 36' 10" W. a distance of 616 feet to the beginning corner 'A', containing 7.16 acres, more or less.

Grantor claims title by deed of conveyance recorded in Deed Book 379, page 588, Recorder's Office, Fairfield County, Ohio.

DESCRIPTION APPROVED FOR FILING  
 FAIRFIELD COUNTY RECORDER  
 BY J.K. DATE 5/11/84

Kang

DR 668 MAR 25 07

WARRANTY DEED

KNOW ALL MEN BY THESE PRESENTS THAT, REICHHOLD CHEMICALS, INC., a Delaware corporation, the Grantor, for the consideration of Ten Dollars (\$10.00) and other good and valuable consideration received to Grantor's full satisfaction from SUPERIOR GLASS FIBERS, INC., an Ohio corporation, the Grantee, whose tax mailing address will be 499 North Broad Street, P.O. Box 89, Bremen, Ohio 43107, does hereby give, grant, bargain, sell and convey unto the Grantee, and its successors and assigns, the premises situated in the Township of Rushcreek, County of Fairfield and State of Ohio further described on Exhibit A attached hereto and made a part hereof (the "Premises").

TO HAVE AND TO HOLD unto the Grantee, and its successors and assigns, with the appurtenances thereof, forever. And the Grantor, for itself and its successors and assigns, hereby covenants with the Grantee, and its successors and assigns, that at and until the delivery of these presents, Grantor is well seized of the Premises as a good and indefeasible estate in fee simple and has good right to bargain and sell the same in manner and form as above written, and that the same are free from all liens and encumbrances except (1) real estate taxes and assessments, general and special, not yet due and payable, (2) all

legal road right of ways, , (3) zoning ordinances, (4) subject to the same conditions and restrictions contained in former instruments concerning said premises, and subject to easements, leases and rights of way of record, and (5) such matters, if any, as are disclosed in the survey by Tobin-McFarland and Associates dated March 16, 1984, and that it will warrant and defend the Premises unto the Grantee, and its successors and assigns, against all lawful claims and demands whatsoever, except as aforesaid.

IN WITNESS WHEREOF, REICHOLD CHEMICALS, INC., through the undersigned who were duly authorized, has signed this deed this 9th day of MAY, 1984.

Signed and acknowledged in the presence of:

REICHOLD CHEMICALS, INC.

Charles A. Loulli

By Colvin B. Seung

Charles Roman

and By x Paul E. J. [Signature]

Witnesses as to Reichold Chemicals, Inc.

TRANSFERRED

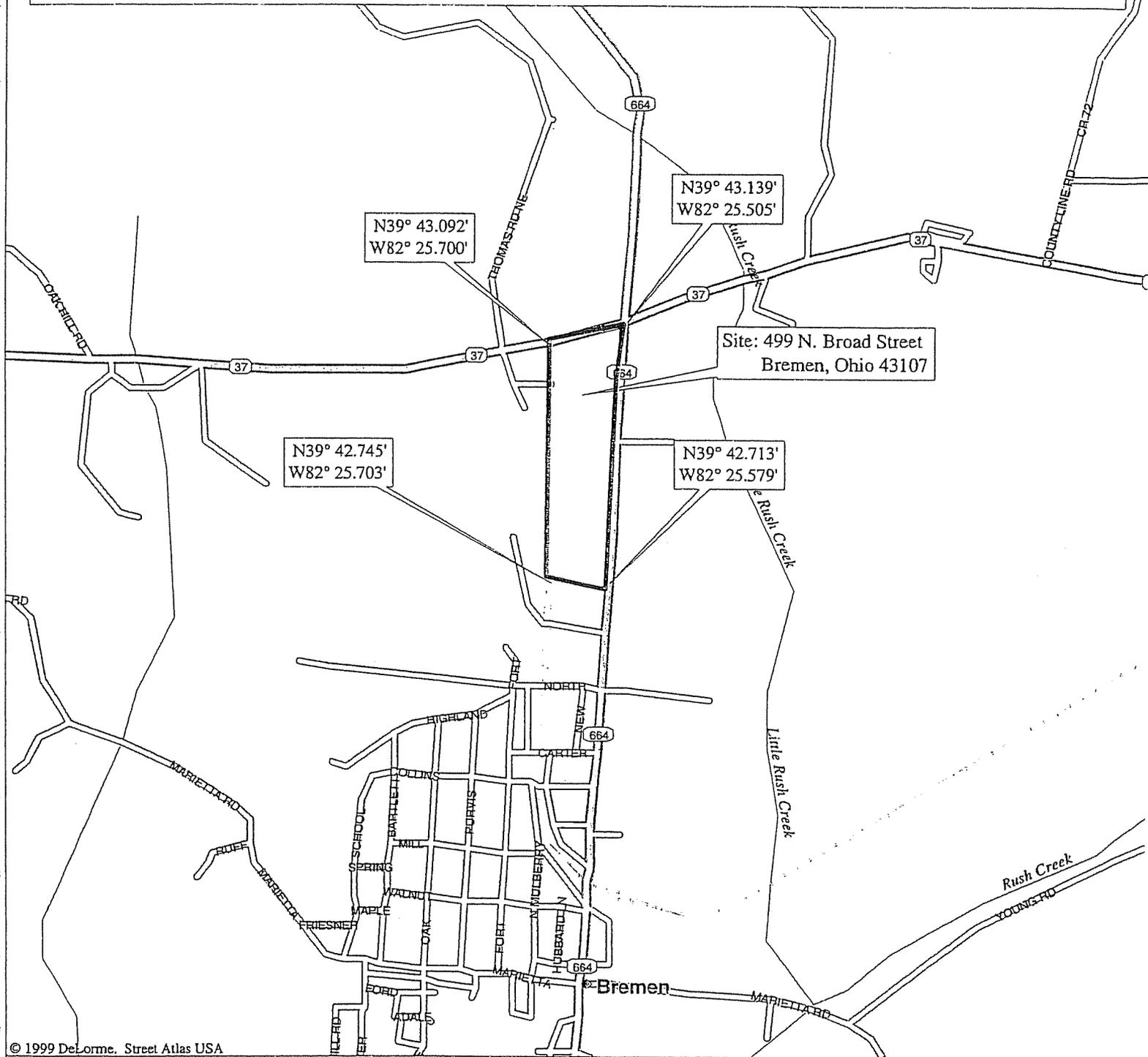
REAL ESTATE CONVEYANCE  
Fee \$ 1,200.00  
Exempt 7/8

MAY 11 1984

James P. Reid  
County Auditor, Fairfield County, Ohio

James P. Reid  
Auditor, Fairfield County, Ohio

# Figure 1. Site Map: Superior Fibers, Inc.



© 1999 DeLorme, Street Atlas USA

Mag 15.00

Wed Feb 16 11:12 2005

Scale 1:15,625 (at center)

0 Feet

500 Meters

-  Local Road
-  State Route
-  Railroad
-  Small Town
-  River/Canal
-  Intermittent River

**National City.**

RECEIVED

MAR 16 2005

OHIO EPA/CDO

To Dennis  
Fr Keith Hughes

Certificate Of Deposit Receipt

Account No. 9560088936

Depositor #1

SUPERIOR FIBERS INC

Depositor #2

Certificate Type

Retail

Retirement

Rate Type

Fixed Rate

Variable Rate

Date 1/08/2005

Amount \$ 15,000.00

Maturity Date 7/08/2007

Interest Rate 3.39 %

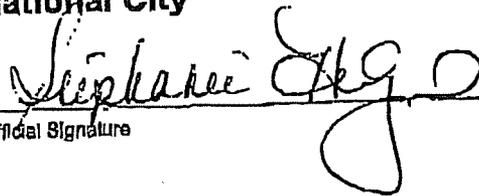
Term 30 Months

Annual Percentage Yield 3.45 %

Interest Payment Method Remain In Account

National City

Official Signature



Subject to the terms and conditions of Bank's Time Deposit Account Agreement and Pricing Schedule as in effect from time to time. A penalty will be imposed for early withdrawal.

NON-NEGOTIABLE AND NON-TRANSFERABLE TIME DEPOSIT

Member FDIC

(10/10/02) DA00810H