



Phase I Environmental Site Assessment

100 and 200 Sinclair Street
Perris, California 92571

July 18, 2022

First Industrial Realty Trust, Inc., First Industrial, L.P.
First Industrial Acquisitions II, LLC and their Affiliates and Assigns
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Project Number 22-06-022

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Jacob Kentnich
First Industrial Realty Trust, Inc.
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Subject: Phase I Environmental Site Assessment
100 and 200 Sinclair Street
Perris, California 92571
Project Number 22-06-022

Dear Mr. Kentnich:

Weis Environmental, LLC has completed the contracted environmental consulting services for the above-referenced project. The services were performed in accordance with our proposal and agreement fully executed by all parties. The Phase I Environmental Site Assessment has been performed in accordance with American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, ASTM Designation E1527-21 and Title 40 of the Code of Federal Regulations (40 CFR) Part 312. This assessment was also completed in accordance with the First Industrial Realty Trust Scope of Work for Phase I ESAs. We appreciate the opportunity to be of service to you on this project. Please contact us if you have any questions or comments regarding this report or if we can be of further assistance.

Sincerely,

Weis Environmental, LLC

A handwritten signature in black ink that reads "Daniel Weis". The signature is written in a cursive, flowing style.

Daniel Weis, R.E.H.S.
Environmental Manager

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1.0 INTRODUCTION

This report presents the methods and findings of a Phase I Environmental Site Assessment (ESA) of the Subject Property located at 100 and 200 Sinclair Street and identified by Riverside County Assessor's Parcel Numbers (APNs) 303-080-012, -013 and -015 in the City of Perris, Riverside County, California (Subject Property) performed in conformance with the contract/agreement for this assignment and the scope and limitations of ASTM Standard Practice E1527-21 and United States Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (AAI) as published in 40 Code of Federal Regulations (CFR) Part 312. EPA promulgated the AAI rule that became effective in November 2006. An acknowledgment is pending by the EPA that the ASTM E1527-21 practice is consistent with the requirements of AAI and may be used to comply with the provisions of the AAI rule. As such, it should be noted that this report also complies with the previously published ASTM E1527-13 standard and for the purposes of this report, any statement regarding compliance with ASTM E1527-21 is also an acknowledgment that the report complies with ASTM E1527-13 and the AAI rule. This assessment was also completed in accordance with the First Industrial Realty Trust Scope of Work for Phase I ESAs.

1.1 Purpose

The purpose of the ASTM E1527-21 practice (framework for this Phase I ESA) is to define good commercial and customary practice in the United States of America for conducting an ESA of a parcel of real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) (Title 42 United States Code (U.S.C.) Section 9601)) and petroleum products. As such, this practice is intended to permit a user to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability (hereinafter, the "landowner liability protections," or "LLPs"): that is, the practice that constitutes all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial and customary practice as defined at 42 U.S.C. Section 9601(35)(B).

In defining a standard of good commercial and customary practice for conducting this Phase I ESA of the Subject Property, the goal of the processes established by the ASTM E1527-21 practice is to identify, to the extent feasible, recognized environmental conditions. The term recognized environmental conditions is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. In addition, controlled recognized environmental conditions, historical recognized environmental conditions, and/or de minimis conditions, if identified during the completion of the assessment, are discussed herein. Definitions of these terms and other key terminology relevant to the practice are included in Section 14.0 of this report.

1.2 Scope of the Assessment

In general terms, this Phase I ESA included the acquisition of readily available/accessible and practically reviewable regulatory records and historical information, a property reconnaissance, interviews, and preparation of this written report of findings. A more detailed description of the four primary components of the Phase I ESA is presented below.



Records Review - A review of Federal, State, Tribal, and local standard ASTM and non-ASTM regulatory databases for a myriad of environmental identifiers including but not limited to properties with underground storage tanks (USTs), properties with leaking USTs, properties that have reported spills/releases that did not occur from a leaking UST, businesses that utilize hazardous materials and/or generate hazardous waste, and hazardous waste disposal locations. The regulatory review may also include public records requests with one or more Federal, State, Tribal, and/or local agencies. A review of historical sources is also completed to help ascertain previous land uses of the property in question and in the surrounding area.

Subject Property Reconnaissance - A property inspection and viewing of adjacent and surrounding properties for conditions that could be recognized environmental conditions.

Interviews - Interviews with present and past owners, operators, and/or occupants of a property and local government officials.

Reporting - Evaluation of the information gathered during the completion of the Phase I ESA and the subsequent preparation of a written report.

1.3 Limitations and Exceptions

Concerns regarding liability under the CERCLA, 42 U.S.C. 9601 et seq. and analogous State laws, have been a primary driver for Phase I ESA assignments in commercial real estate transactions. While the ASTM E1527-21 practice can be used in many contexts, a familiarity with CERCLA and its potential LLPs is critical in understanding and applying the ASTM E1527-21 practice. We advise consultation with legal counsel if further inquiry or information is desired.

AAI represents the minimum level of inquiry necessary to support the LLPs. However, it is important to understand that additional inquiry ultimately may be necessary or desirable for legal as well as business reasons depending upon the outcome of this inquiry and the particular risk tolerances of a given user. For example, additional inquiry may assist a user of a Phase I ESA in determining whether he or she would have continuing obligations in the event he or she acquires a given property and may also assist the user in defining the scope of future steps to be taken to satisfy such obligations. In addition, a user may be concerned about business environmental risks or non-scope ASTM considerations that do not fall within the definition of a recognized environmental condition. In addition, this assessment did not include subsurface or other invasive exploration, unless specifically documented herein. Users are also cautioned that Federal, State, Tribal, and local laws may impose environmental assessment obligations that are beyond the scope of the ASTM E1527-21 practice.

The evaluation, opinion, and conclusions presented herein are based solely on visual observations and regulatory, historical, and personal knowledge related information that existed at the time our assessment was completed. The use of the gathered information is exclusively for the purposes outlined in this report and only for the Subject Property. Our firm can make no warranty, either express or implied, except that the services conducted were performed in accordance with generally accepted environmental assessment practices applicable at the time and location of the assessment and that the conclusions of the assessment have been based in part on professional judgment/experience, an interpretation of readily available data and the standard of care normally followed by similar professionals practicing in a similar locale and under similar circumstances. Any opinions presented cannot apply to Subject Property changes of which our firm is unaware and has not had the opportunity to evaluate. In addition, this report cannot feasibly include any evaluation of undocumented activities at the Subject Property or on adjacent or nearby properties. Lastly, a Phase I ESA meeting or exceeding this practice and completed less than 180 days prior to the date of acquisition of a given property or



(for transactions not involving an acquisition) the date of the intended transaction is presumed to be valid.

1.4 Special Terms and Conditions

This Phase I ESA was prepared in accordance with the terms and conditions of the contract/agreement for the work as executed between our firm and the client. There are no other special terms and conditions established between our firm and the client pertinent to the findings of this ESA or methodology used to complete this assessment. In addition, our firm has no final or other vested interest in the Subject Property or adjacent/surrounding properties, or in any entity that owns or occupies the Subject Property or adjacent/surrounding properties.

1.5 Limiting Conditions and Deviations

There were no significant limiting conditions that would inhibit our ability to identify recognized environmental conditions noted during the completion of this assessment. In addition, there were no deviations from the ASTM E1527-21 standard noted during the completion of this assessment. Any limiting conditions that are not considered to be ones that would inhibit our ability to identify recognized environmental conditions at the Subject Property are referenced in applicable sections of this report.

1.6 Data Failure and Data Gaps

No instances of data failure were encountered during the completion of this assessment. In addition, no data gaps of significance (i.e., those that would inhibit our ability to identify recognized environmental conditions) were identified during the completion of this assessment. Any data gaps that are not considered to be ones that would inhibit our ability to identify recognized environmental conditions at the Subject Property are referenced in applicable sections of this report.

1.7 Reliance

This report has been prepared for the exclusive use of First Industrial Realty Trust, Inc., First Industrial, LP and First Industrial Acquisitions II, LLC and their Affiliates and Assigns (User). This report may not be relied upon by any other person or entity without the written consent of both our firm and our client. The scope of services performed for this assessment may not be appropriate to satisfy the specific needs of other users, and any use or reuse of this document would be at the sole risk of said users. Any other party seeking liability protection under CERCLA must take independent action to accomplish its objective.



2.0 SUBJECT PROPERTY DESCRIPTION

2.1 Location and Legal Description

The Subject Property is a reported 19.66 acres and located to the north of West Rider Street, south of Morgan Street, east of Barrett Avenue and west of North Perris Boulevard at the physical addresses of 100 and 200 Sinclair Street. The Subject Property is further identified by Riverside County APNs 303-080-012, -013 and -015. A Vicinity Map is included as Figure 1. A Site Plan is included as Figure 2.

2.2 Subject Property and Vicinity Characteristics

The Subject Property is situated in an area consisting of commercial/light industrial land uses and vacant lots in the City of Perris. Additional details pertaining to the Subject Property and its adjoining properties are provided in the sections below.

2.3 Current Use of the Subject Property

The northern portion of the Subject Property at 100 Sinclair Street is currently an unoccupied commercial/light-industrial property. The southern portion of the Subject Property at 200 Sinclair Street is an active glass, plastic, and paper recycling facility (RecycleWise).

2.4 Description of Subject Property Improvements

The Subject Property is developed with two two-story light industrial buildings with mezzanine levels. The northern building (100 Sinclair Street) is an estimated 150,000 square feet and the southern building (200 Sinclair Street) is an estimated 45,000 square feet. Both structures were reportedly constructed in 2000. The structures appear to be of concrete masonry and corrugated steel construction and situated on a concrete slab-on-grade foundations. Other portions of the Subject Property consist of asphalt- and concrete-paved driveways and current/former operational areas to the north and south of the two structures, asphalt parking areas to the east and southeast, paved shipping/receiving areas, unpaved storage yards to the west each building, and minor landscaping. Access to the Subject Property is provided by Sinclair Street. Indicators of various utility systems are also present throughout the Subject Property.

2.5 Utilities

Utilities that are reported to be present at the Subject Property or provide service in the surrounding area are noted below along with their municipal provider where applicable.

Utility	Provider (Where Applicable)
Potable Water	Eastern Municipal Water District.
Sewage Maintenance	Eastern Municipal Water District.
Electrical	Southern California Edison.
Natural Gas	Southern California Gas.
Solid Waste Disposal	CR&R Waste Services – Perris.



2.6 Description of Adjoining Properties

Adjoining properties are defined as any real property or properties, the border of which is contiguous or partially contiguous with that of the subject property of a Phase I ESA, or that would be contiguous or partially contiguous with that of a subject property but for a street, road, or other public thoroughfare separating them. To the extent feasible, our firm performed a visual inspection of adjoining properties from the Subject Property boundaries and along public rights-of-way. We did not encroach on to adjoining private property during the completion of this assessment. The following table identifies the adjoining property uses:

Direction	Adjoining Property Use
North	Vacant land (3562 North Perris Boulevard), then Morgan Street.
South	Vacant land (unaddressed; APN 303-090-037).
East	Vacant land (3562 North Perris Boulevard, then North Perris Boulevard.
West	Commercial/warehouse facility (3500 Indian Avenue).

2.7 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the land use of the Subject Property and improvements at the Subject Property. In addition, the land uses of adjoining properties and properties in the vicinity of the Subject Property do not represent recognized environmental conditions to the Subject Property.



3.0 PHYSICAL SETTING

3.1 Topography

The Subject Property is depicted on the United States Geological Survey (USGS) topographic map for the Perris, California 7.5-minute quadrangle. The Subject Property is shown on the map as being situated at an average elevation of approximately 1,460 feet above mean sea level. The Subject Property and surrounding area appear to trend slightly to the east. There are no improvements or structures depicted on the Subject Property on the map. Surrounding roadways and the Colorado River Aqueduct (subsurface) are depicted on the map. The Subject Property as depicted on a topographic map is included as Figure 3.

3.2 Hydrology

The Subject Property is situated within the Perris North Hydrologic Area (HA) of the San Jacinto River Basin Hydrologic Unit. There are no known substantial hydrologic features at the Subject Property including major storm drain inlets or obvious drainages, channels, or surface waters. Due to the substantial amount of paving at the Subject Property, infiltration of precipitation to the Subject Property is likely relatively minor. However, a dry well system was installed circa 2019 north and south of the 200 Sinclair Street structure resulting in direct infiltration of captured stormwater runoff. The system reportedly consists of Torrent Resources MaxWell® Plus drainage features. The systems reportedly pre-treat early storm water flows during rain events using absorbent technology. Any excess water would appear to flow as surface runoff to the east to the adjoining vacant lot and surrounding areas of lower elevation. The Subject Property does not appear to receive significant drainage from off-site properties. Based on visual observations of the dry well system at the surface, recent installation and advanced technology of the dry well system and the nature of operations at the 200 Sinclair portion of the Subject Property, the dry well system is not considered to be a recognized environmental condition.

3.3 Geology

General geologic information pertaining to the Subject Property is presented in the table below.

Geologic Consideration	Details
California Geomorphic Province	Peninsular Ranges.
Mapped Soils or Formation	Very old alluvial fan deposits.
Description of Soils or Formation	Slightly to moderately consolidated silts, sands, and gravel.
Distance/Direction to Mapped Faults	No known faults are present on the Subject Property. Segments of the San Jacinto Fault and Elsinore Fault are located approximately nine miles northeast and thirteen miles southwest of the Subject Property, respectively.



3.4 Hydrogeology

General hydrogeologic information pertaining to the Subject Property is presented in the table below.

Hydrogeologic Consideration	Details
Groundwater Basin or Unit	Perris North Hydrologic Area.
Beneficial Uses	Municipal, industrial, and agricultural.
Estimated Depth to Groundwater	Greater than 50 feet below the surface.
Estimated Flow of Groundwater	South to southeast.
Known Subject Property or Regional Groundwater Contamination Issues	Refer to Section 9.0.

3.5 Oil and Gas Exploration

According to online resources provided by the California Department of Conservation, Geologic Energy Management Division (CalGEM), there are no oil, gas or geothermal wells located on the Subject Property or its adjacent properties.

3.6 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with Subject Property physical setting considerations. In addition, physical setting considerations related to the adjoining properties and properties in the vicinity of the Subject Property do not represent recognized environmental conditions to the Subject Property.



4.0 USER PROVIDED INFORMATION

A representative of the User of this report was interviewed during the completion of this assessment. The questions posed during the interview are defined by the ASTM E1527-21 practice. A copy of a questionnaire completed by the User is included in Appendix A. The User also provided our firm with any land title records and judicial records that may be available for the Subject Property as part of the required evaluation for environmental liens and activity and use limitations (AULs) in connection with the subject property of a Phase I ESA. As stated in the ASTM E1527-21 practice, it is the responsibility of the user of the report to provide any available records pertaining to environmental liens and AULs that may exist in connection with a given property. Any land title and judicial records provided to our firm are discussed below. If such information is not discussed in the sections below, it was not provided by the user of the report.

In addition to the contact information obtained, the user of the report was also asked if they are aware of other useful documents that may exist and if so whether copies can be provided to the environmental professional within reasonable time and cost constraints. A list of typical useful documents is included in Section 10.8.1 of the ASTM E1527-21 practice and include but are not limited to environmental assessment reports, compliance audits and permits, registrations for tank and other aboveground or underground systems, safety plans, spill prevention and other facility related plans and geological/geotechnical studies and environmental governmental agency notices, and/or correspondence.

4.1 Title Records

The User has reported completing a review of title for environmental liens and activity and use limitations. None were reported.

4.2 Environmental Liens

The User is unaware of environmental liens in connection with the Subject Property.

4.3 Activity and Use Limitations

The User is unaware of AULs in connection with the Subject Property.

4.4 Specialized or Actual Knowledge or Experience

The User is unaware of specialized knowledge, actual knowledge or experience that is material to recognized environmental conditions in connection with the Subject Property other than that contained in prior assessment reports. Those reports were provided and are summarized in this report.

4.5 Commonly Known or Reasonably Ascertainable Information

The User is unaware of commonly known or reasonably ascertainable information within the local community that is material to recognized environmental conditions in connection with the Subject Property other than that contained in prior assessment reports. Those reports were provided and are summarized in this report.



4.6 Valuation Reduction for Environmental Issues

The User is unaware of information pertaining to an undervalued purchase price of the Subject Property relative to the estimated fair market value of the Subject Property due to the presence of contamination. However, the 100 Sinclair Street portion of the Subject Property is not for sale.

4.7 Owner, Property Manager, and Occupant Information

The northern portion of the Subject Property (100 Sinclair Street) is currently owned and managed by the User (owner since 2009) and is unoccupied. The southern portion of the Subject Property (200 Sinclair Street) is owned and managed by K3JH, LLC and is occupied by RecycleWise, a California recyclables redemption center and recycling processor.

4.8 Reason for Performing Phase I ESA

The User has commissioned this Phase I ESA as part of a proposed real estate transaction (acquisition) and to assist the client in complying with 40 CFR Part 312. The Phase I ESA is also being completed to evaluate Subject Property conditions with respect to the User's plans for redevelopment.

4.9 Proceedings Involving the Subject Property

The User is unaware of pending, threatened, or past litigation and administrative proceedings relevant to hazardous substances or petroleum products in, on, or from the Subject Property. The client is also unaware of notices from any governmental entity regarding any possible violation of environmental laws or possible liability relating to hazardous substances or petroleum products in connection with the Subject Property.

4.10 Other Provided Documents

The following prior environmental assessment reports (copies included in Appendix A) were provided to us for review:

- LOR Geotechnical Group, Inc. 1995. Subsurface Soil Sampling and Testing, National RV, Inc., 3411 N Perris Boulevard, Perris, California. Prepared for: National RV, Inc. April 28, 1995.
- LOR Geotechnical Group, Inc. 2006. Phase I Environmental Site Assessment, National RV, Inc., 3411 North Perris Boulevard and 100 West Sinclair Street, Perris, California. Prepared for: National RV, Inc. October 15, 2006.
- Advantage Environmental Consultants, LLC 2007. Phase I Environmental Site Assessment, National RV, Inc., 3411 N. Perris Boulevard & 100 W. Sinclair Street, Perris, California 92571. Prepared for: First Industrial Realty Trust, Inc. and First Industrial, L.P. March 16, 2007.
- Advantage Environmental Consultants, LLC 2007. Phase II Environmental Site Assessment, National RV, Inc., 3411 N. Perris Boulevard & 100 W. Sinclair Street, Perris, California 92571. Prepared for: First Industrial Realty Trust, Inc. and First Industrial, L.P. June 5, 2007.

In 1995, LOR Geotechnical Group, Inc. collected five soil samples at the National RV facility located at 3411 North Perris Boulevard. This property is situated to the east of the Subject Property across North Perris Boulevard. At the time of the assessment, the Subject Property was occupied by the same business as the adjacent property (National RV, Inc.). None of the soil samples were collected at the



Subject Property and no contaminants of concern were identified in soil samples obtained from the adjacent property.

In 2006, LOR Geotechnical Group, Inc. prepared a Phase I ESA on behalf of National RV, Inc. for the properties at 3411 North Perris Boulevard and 100 West Sinclair Street (Subject Property of our current Phase I ESA, including both the current 100 and 200 Sinclair buildings). The Phase I ESA was performed in general accordance with ASTM Standard E1527-05 and consisted of general reconnaissance of the subject properties and immediate vicinity, a compilation, review and interpretation of published reports and data available from various private, public and regulatory agencies, a review of historical aerial photographs, topographic maps, and city directories, interviews with personnel familiar with Subject Property operations, and report preparation. At the time of the assessment, the study area was comprised of four legal parcels totaling a reported 50 acres. The 100 West Sinclair Street property at the time was 20 acres and consisted of two legal parcels and two buildings identified as Buildings #4 and #5. Since the 2006 assessment, the parcel containing Building #4 (southern portion of the Subject Property) was sold by the client and readdressed as 200 West Sinclair Street (current recycling facility/business). At the time of the 2006 assessment, Building #4 was occupied by National RV, Inc. (RV manufacturing company) and Building #5 was occupied by both National RV, Inc. and Weekend Warrior (trailer manufacturing facility). No recognized environmental conditions were noted in connection with the Subject Property at the time of the assessment. However, poor housekeeping was noted in the Weekend Warrior leased areas of the Subject Property and current southern adjoining property. Improved housekeeping practices were recommended.

In 2007, Advantage Environmental Consultants, LLC prepared a Phase I ESA in general accordance with ASTM Standard E1527-05 for the above referenced 50 acres that were assessed by LOR. The current and historical use of the properties as an industrial facility (RV and trailer manufacturing) was considered to be a recognized environmental condition. This conclusion was based on the length of time that industrial operations had occurred at the property, the nature of the operations at the properties (including the storage and use of hazardous materials), documented/former poor housekeeping at the Weekend Warrior subleased space and documented non-compliance with regulatory agencies pertaining to hazardous waste/materials management as indicated by levied violations and consent orders. Areas of concern identified at 100 and 200 W. Sinclair Street (Subject Property of our current Phase I ESA) included a Weekend Warrior overspray painting area, Weekend Warrior and National RV yard areas near a hazardous waste storage area (west of the existing buildings), paint booth areas in both buildings, and a clarifier near the southwest corner of the northern building. A Phase II ESA was recommended.

The Phase II was also completed in 2007 and consisted of the drilling of 12 soil borings using direct-push methods. Five of the 12 borings identified as B8, B9, B10, B11 and B12 were drilled at the Subject Property at the following locations:

- B8 – Paint Booth
- B9 – Hazardous waste storage area
- B10 – Clarifier area
- B11 – Weekend Warrior yard (adjacent to hazardous waste storage)
- B12 – Weekend Warrior overspray area

Each of the borings were drilled to 20 feet with multiple soil samples collected at each location. A total of ten soil samples were selected for analysis at these locations with depths ranging from one to 10 feet in depth. None of the samples exhibited staining, odors or detections of undifferentiated volatile



organic compounds (VOCs) when screened using a photoionization detector. Six of the soil samples were analyzed for petroleum hydrocarbons and VOCs, while four additional samples (overspray area and paint booth) were analyzed for VOCs only. No contaminants of concern were identified in any of the soil samples collected at the Subject Property. Similar conditions (i.e., no detections of contaminants) were also documented at the nearby property to the east. No additional assessment was recommended.

4.11 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the user provided information.



5.0 REGULATORY RECORDS REVIEW

Our firm commissioned the preparation of a regulatory database report from Environmental Risk Information Services (ERIS) as part of the regulatory records review. ERIS searches a myriad of Federal, State, and local government environmental databases during the preparation of their deliverables. Certain databases are specifically required by the ASTM E1527-21 practice and are referenced as “standard ASTM regulatory databases.” Such databases are searched to at least the minimum search distance around a given property as defined in the practice. Other regulatory databases are also searched that are not specifically referenced in ASTM E1527-21. Such databases are referenced as “non-ASTM regulatory databases” and are searched as varying radii around a given property as selected by ERIS.

Descriptions of each database searched and the dates that the regulatory databases were last updated by the applicable agencies are included in the ERIS report. The extent of historical information varies with each database and current information is determined by what is publicly available to ERIS at the time of an updates. ERIS updates databases in accordance with ASTM E1527-21 which states that government information from nongovernmental sources may be considered current if the source updates the information at least every 90 days, or, for information that is updated less frequently than quarterly by the government agency, within 90 days of the date the government agency makes the information available to the public.

Our firm also reviewed unplottable sites listed in the database report by cross-referencing reasonably ascertainable information pertaining to such properties that may include facility names, street names, zip codes or other information. Unplottable sites are ones that cannot be formally mapped or geocoded due to various reasons, including limited geographic information. Any unplottable sites that we identify within the specified search radii have been evaluated as part of the preparation of this report. A copy of the regulatory database report is included in Appendix B.

5.1 Standard ASTM Regulatory Database Search

The tables below present the standard Federal, State, Tribal and local ASTM databases that were searched by ERIS including the search distances from the Subject Property. Below the tables are descriptions of any listings for the Subject Property that may appear in the databases. In addition, a discussion of adjoining properties or properties in the Subject Property vicinity that are listed in one or more regulatory databases that in our professional judgment and opinion have the potential to adversely impact the Subject Property due to current or former releases of hazardous substances and/or petroleum products that occurred at said properties is presented. This practice of discussing only properties of potential environmental concern to the Subject Property is noted in ASTM E1527-21 which states that the environmental professional may make statements applicable to multiple properties listed in regulatory databases that are not likely to have current or former releases of hazardous substances and/or petroleum products with the potential to migrate to a given subject property. Our professional judgment and opinions discussed herein are based on several factors including the nature of the regulatory database listings, distance of the off-site listed properties from the Subject Property, orientation of the listed properties relative to the Subject Property, interpreted direction of groundwater flow, and/or regulatory case status information for the various properties as described in the databases.



The following Federal standard ASTM databases were searched:

Standard Environmental Record Source Name	ERIS Regulatory Database Identification	Search Distance From Subject Property (Miles)
National Priorities List (NPL) Site List	NPL – Proposed NPL – Superfund Record of Decision (ROD)	1.0
Delisted NPL Site List	Deleted NPL	0.5
Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) List	CERCLIS - SEMS – SEMS Archive – ODI – IODI	0.5
CERCLIS List	CERCLIS LIENS – SEMS LIENS	Subject Property
CERCLIS No Further Remedial Action Planned (NFRAP) Site List	CERCLIS NFRAP	0.5
Resource Conservation and Recovery Act (RCRA) Corrective Action Sites (CORRACTS) Facilities List	RCRA CORRACTS – Department of Energy (DOE) Formerly Utilized Sites Remedial Action Program (FUSRAP)	1.0
RCRA Non-CORRACTS Treatment, Storage and Disposal (TSD) Facilities List	RCRA TSD	0.5
RCRA Generators List	RCRA LQG – RCRA SQG – RCRA VSQG – RCRA CESQG – RCRA NON-GEN – BULK TERMINAL – REFN – FEMA Underground Storage Tank (UST) – Facility Response Plan (FRP) – HIST GAS STATIONS	0.25
Institutional Control/Engineering Control Registries	FED ENG – FED INST – FED Brownfields – Land Use Control Information System (LUCIS) – RCRA Controls	0.5
Emergency Response Notification System (ERNS) List	ERNS – ERNS 1982 to 1986 – ERNS 1987 to 1989	Subject Property

Subject Property – The Subject Property is identified as National RV, Inc. at 100 W. Sinclair Street on the RCRA LQG and RCRA SQG standard Federal ASTM regulatory databases and as RecycleWise at 200 Sinclair Street on the RCRA NON GEN database. National RV, Inc. is referenced with EPA Handler IDs of CAR000104331 and CAL000219327 and with no reported violations. Listings identify generation of small and large quantities of hazardous waste including spent nonhalogenated solvents, ignitable wastes, and methyl ethyl ketone. There are no references to chlorinated solvents in the database listings for the Subject Property. RecycleWise is referenced with EPA Handler ID CAC003152234 and with no reported violations. The listing identifies the facility as an implementer and not a generator of hazardous waste. The Subject Property is not listed on Federal databases indicative of releases of hazardous substances or petroleum products to the subsurface. These listings are not considered to be recognized environmental conditions in connection with the Subject Property.

Adjoining Properties – Wayfair, LLC (western adjoining property at 3500 Indian Avenue) is listed on the RCRA NON-GEN standard Federal ASTM regulatory database with EPA Handler ID



CAL000455449 and no reported violations. This property is not listed on databases indicative of releases of hazardous substances or petroleum products to the subsurface and is not considered to be a recognized environmental condition to the Subject Property.

Other Properties – There are 14 listings on the standard Federal ASTM regulatory databases pertaining to multiple properties in the surrounding area including RCRA LQG (one listing) and RCRA NON-GEN (13 listings). None of these properties are considered a recognized environmental condition to the Subject Property. Our opinions regarding adjoining and nearby properties are based on the distance of the off-site listed properties from the Subject Property, listings indicative of hazardous substance or petroleum product releases, orientation of the listed properties relative to the Subject Property, interpreted direction of groundwater flow, and/or regulatory case status information for the various properties as described in the databases.

The following State, Tribal and local standard ASTM databases were searched:

Standard Environmental Record Sources Name	ERIS Regulatory Database Identification	Search Distance From Subject Property (Miles)
Equivalent NPL	RESPONSE	1.0
Equivalent CERCLIS	ENVIROSTOR – DELISTED ENVS – HWP – HHSS – SAM SAN DIEGO	0.5
Landfill and/or Solid Waste Disposal Site Lists	SWF/LF – LDS – SWAT – WMUD – SWRCB SWF – Construction and Demolition (C & D) DEBRIS RECY – CONTAINER RECY – RECYCLING – PROCESSORS	0.5
Leaking Storage Tank Lists	LUST – DELISTED LST – UST CLOSURE – CLEANUP SITES – INDIAN LUST – DELISTED ILST	0.5
Registered Storage Tank Lists	UST – AST – AST SWRCB – TANK OIL GAS – DELISTED TNK – CERS TANK – DELISTED CTNK – HIST TANK – UST SWEEPS – INDIAN UST – DELISTED IUST – DELISTED COUNTY – LOP RIVERSIDE – UST RIVERSIDE	Subject Property and Adjoining Properties
Institutional Control/Engineering Control Registries	LUR – HLUR - DEED	Subject Property
Voluntary Cleanup Sites	VCP	0.5
Brownfield Sites	CALSITES	0.5

Subject Property – The Subject Property was identified as Avalon Shutters at 100 W. Sinclair Street on the DELISTED COUNTY standard State ASTM regulatory database and RecycleWise at 200 Sinclair Street on the State RECYCLING and PROCESSORS databases. The DELISTED COUNTY listing identifies that Avalon Shutters has been removed from County of Riverside databases due to being either inactive or operations deemed to be below reportable thresholds relative to hazardous materials and/or waste. The RECYCLING and PROCESSORS listings identify RecycleWise as a certified recycling facility under the State of California’s Beverage Container Recycling Program in



operation since 2011. No releases were reported, and these listings are not considered to be a recognized environmental condition in connection with the Subject Property.

Adjoining Properties – Adjoining properties were not listed in State, Tribal, and local standard ASTM databases.

Other Properties – There are seven listings on the State, Tribal, and local standard ASTM regulatory databases pertaining to multiple properties in the surrounding area including ENVIROSTOR (one listing), LUST (one listing), HHSS (one listing), UST SWEEPS (one listing), HIST TANK (one listing), DELISTED COUNTY (one listing), and LOP RIVERSIDE (one listing) databases. None of these properties are considered a recognized environmental condition to the Subject Property. Our opinions regarding adjoining and nearby properties are based on the distance of the off-site listed properties from the Subject Property, listings indicative of hazardous substance or petroleum product releases, orientation of the listed properties relative to the Subject Property, interpreted direction of groundwater flow and/or regulatory case status information for the various properties as described in the databases.

5.2 Non-ASTM Regulatory Database Search

A myriad of non-ASTM regulatory databases was searched by ERIS as noted in the regulatory database report.

Subject Property – The Subject Property is listed on the following non-ASTM regulatory databases:

- FINDS/FRS database as National RV, Inc. and Avalon Shutters at 100 W. Sinclair Street and RecycleWise at 200 Sinclair Street. These listings identify the Subject Property as a biennial hazardous waste reporter, motor home manufacturer, wood, window, and door manufacturer, and scrap and waste materials facility.
- HZH RIVERSIDE database as Building Materials Distributors, Inc. at 100 W. Sinclair Street. This listing identifies that the Building Materials Distributors, Inc. had a business plan filed with the County of Riverside Department of Environmental Health.
- HAZNET database as Avalon Shutters, National RV, Inc., and Weekend Warrior Trailers, Inc. at 100 W. Sinclair Street. The listings reference EPA ID numbers CAL000348398, CAL000219327, CAL000320081, and CAR000104331. Listings identify that hazardous waste manifests were generated for the following materials: unspecified solvent mixtures, waste and mixed oil, organics, other inorganic solid waste, oxygenated solvents, oil/water separation sludge, unspecified organic liquid mixtures, and other organic solids. No references to chlorinated solvents was noted.
- EMISSIONS database as Avalon Shutters and National RV, Inc. at 100 W. Sinclair Street. The listing references an EPA ID number of CAC002627822 with no other details provided. Listings identify that air emissions were monitored in 2004 through 2007 and 2010.
- CERS HAZ database as Building Materials Distributors, Inc. at 100 W. Sinclair Street. The database listing identifies minor violations related to the reporting, documentation, and storage area signage of hazardous materials stored at the property. Compliance has reportedly been achieved for all violations.



The above listings are not indicative of releases of hazardous substances or petroleum products to the subsurface and there are no references to chlorinated solvents in the databases. These listings are not considered to be recognized environmental conditions in connection with the Subject Property.

Adjoining Properties – Adjoining properties were not listed on the non-ASTM regulatory databases.

Other Properties – There are 21 listings on the non-ASTM regulatory databases pertaining to multiple properties in the surrounding area including SCH (one listing), CERS HAZ (four listings), DELISTED HAZ (two listings), EMISSIONS (seven listings), HWG RIVERSIDE (five listings), and HZH RIVERSIDE (two listings). None of these properties are considered a recognized environmental condition to the Subject Property. Our opinions regarding adjoining and nearby properties are based on the distance of the off-site listed properties from the Subject Property, listings indicative of hazardous substance or petroleum product releases, orientation of the listed properties relative to the Subject Property, interpreted direction of groundwater flow and/or regulatory case status information for the various properties as described in the databases.

5.3 Regulatory Agency File Reviews

If a property being assessed under a Phase I ESA or any of the adjoining properties are identified on one or more of the above referenced standard environmental record sources, pertinent regulatory files and/or records associated with such listings should be reviewed to assist the environmental professional in evaluating if recognized environmental conditions exist at a given subject property in connection with any listings. However, if in the environmental professional’s opinion, such a review is not warranted, file reviews need not be conducted if the environmental professional provides justification for not doing so.

Agency file reviews for the Subject Property completed during this assessment are noted below. No file reviews for adjoining properties or properties in the surrounding area were deemed warranted with the exception of research completed on the State Water Resources Control Board GeoTracker database regarding properties in the surrounding area of the Subject Property. The agency inquiries were performed by way of on-line searches/queries of published databases and/or direct inquiries with public records clerks at one or more agencies. James Wright of Weis Environmental conducted the agency file reviews during the completion of this assessment. Copies of regulatory agency records are included in Appendix C.

Regulatory Agency	Jurisdiction	Date of Inquiry or Request	Contact	Response or Information from Agency
United States EPA Envirofacts/ECHO/ TRIS	Federal	6/24/2022	Online https://enviro.epa.gov/ https://echo.epa.gov/facilities/facility-search https://www.epa.gov/toxics-release-inventory-tri-program	Records Identified
California Department of Toxic Substances Control (DTSC)	State	6/24/2022	Online https://www.envirostor.dtsc.ca.gov/public https://hwts.dtsc.ca.gov/report_list.cfm	Records Identified



Regulatory Agency	Jurisdiction	Date of Inquiry or Request	Contact	Response or Information from Agency
State Water Resources Control Board/Regional Water Quality Control Board (RWQCB)	State	6/24/2022	Online https://geotracker.waterboards.ca.gov/ https://geotracker.waterboards.ca.gov/historical_ust_facilities https://www.waterboards.ca.gov/water_issues/programs/ciwqs/index.html https://smarts.waterboards.ca.gov/smarts/SwSmartsLogin.xhtml	Records Identified
Riverside County	Local	6/17/2022	Public Records Clerks	Records Identified
City of Perris	Local	6/17/2022	Public Records Clerk	Records Identified

United States EPA – National RV, Inc. at 100 W. Sinclair Street was identified in the EPA Envirofacts and ECHO databases. Records identified and associated EPA ID Nos. were consistent with information provided in the ERIS database report. None of the information revealed is considered to be a recognized environmental condition in connection with the Subject Property.

California DTSC - The DTSC maintains copies of hazardous waste manifests pertaining to wastes remove from the Subject Property between 2001 and 2015. Between zero and 26 manifests were generated annually at 100 W. Sinclair Street during this period associated with the EPA ID Nos. CAR000104331, CAL000320081, CAL000219327, and CAL000348398. RecycleWise at 200 Sinclair Street was identified in DTSC records with the EPA ID No. CAC003152234 and with zero manifests generated. All EPA IDs were identified as inactive. No chlorinated solvents are referenced as being part of Subject Property operations and no releases were reported. DTSC-provided information is consistent with the ERIS database report. None of the information revealed is considered to be a recognized environmental condition in connection with the Subject Property.

State Water Resources Control Board/RWQCB – Records included various applications, Notices of Intent, and administrative enforcement actions related to Subject Property industrial and construction stormwater permits. No releases were reported. None of the information revealed is considered to be a recognized environmental condition in connection with the Subject Property.

City of Perris - Records included several inspection records, building permits, and spray booth permits (e.g., permit applications, structures, utilities, certificates occupancy, plan reviews, etc.) pertaining to the Subject Property. No releases were reported. None of the information revealed is considered to be a recognized environmental condition in connection with the Subject Property.

County of Riverside – County files reference National RV, Weekend Warrior Inc., Avalon Shutters Inc. and Building Materials Distributors, Inc. as permitted entities for the Subject Property. The files contain various typical documents pertaining to hazardous waste and materials management including business plans, change of status reports, permits, hazardous materials/waste inventories, and inspection reports. Listed hazardous materials were generally limited to petroleum products, petroleum-based solvents, paints, and compressed gases. No chlorinated solvents were referenced in the inventory forms. Administrative related violations were issued pertaining to permitting, employee training,



business plan corrections and other typical administrative related formalities. The Weekend Warrior and Building Materials Distributors tenants both received notices of violation for operating without valid permits. National RV also received violations pertaining to the storage and labeling of hazardous materials and waste storage containers. However, all reported violations have since achieved compliance. Two (2) minor spills were noted from a trash compactor (oil) and forklift batteries (sulfuric acid). The spills appeared to be very small in quantity (less than 1 gallon) and occurred on concrete that was observed in good condition. As such, these minor spills are considered a de minimis condition. Information included in the County files is consistent with information noted in the regulatory database report discussed previously in this report. None of the information revealed is considered to be a recognized environmental condition in connection with the Subject Property.

5.4 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the regulatory records searches. In addition, regulatory resources related to the adjoining properties and properties in the vicinity of the Subject Property do not represent recognized environmental conditions to the Subject Property.



6.0 HISTORICAL RESOURCE REVIEW

The objective of consulting historical sources is to develop a history of the previous uses of a property and surrounding area, in order to help identify the likelihood of past uses having led to recognized environmental conditions in connection with a given property. The goal of the historical research is to identify all obvious uses of a subject property from the present, back to the property’s first developed use, or back to 1940, whichever is earlier. The environmental professional exercises professional judgment in reviewing only as many of the standard historical sources referenced in ASTM E1527-21 that are deemed necessary, are reasonably ascertainable and are likely to be useful. Historical resources reviewed during the completion of this assessment are referenced below. Copies of the historical resources are included in Appendix D.

6.1 Aerial Photographs

We reviewed historical aerial photographs from the years 1938, 1953, 1958, 1962, 1966, 1970, 1976, 1985, 1997, 2002, 2004, 2005, 2006, 2010, 2012, 2014, 2016, 2018 and 2020 provided by ERIS. The table below presents the results of the photograph review.

Photograph Year	Subject Property Observations	Adjoining Property Observations
1938-1985	The Subject Property is used for agricultural purposes (row crops). A small agricultural irrigation pond and water well house is visible on the southwestern portion.	Adjoining and surrounding properties are utilized for agricultural purposes. Several small structures are present on the northern-adjointing property. A drainage pathway or culvert is visible south of the Subject Property. North Perris Boulevard is visible along the east side of the eastern-adjointing property.
1997	Similar to the prior photographs.	Adjoining property use is generally similar to the prior photographs. The northern-adjointing property appears to have been cleared and used for storage. Commercial/light-industrial development is visible to the east of the eastern-adjointing property.
2002-2006	The Subject Property appears similar to its current configuration.	The eastern- (vacant lot), northern- (vacant lot), and southern-adjointing (vacant lot) properties appear similar to their current configurations.
2010	The Subject Property appears similar to its current configuration.	The western-adjointing property appears to be a vacant lot and no longer used for agricultural purposes. Other adjoining properties appear similar to previous photographs and current configurations.
2016-2020	The Subject Property appears similar to its current configuration.	The warehouse building is now present on the western-adjointing property. All adjoining properties appear similar to current configurations.

As stated above, the Subject Property has been previously used for agricultural purposes (row crops). During historical agricultural activities throughout the State of California, various pesticides and more specifically organochlorine pesticides were commonly applied during the normal course of agricultural operations. Such compounds have since been banned from production and use in the United States.



Based on the regulatory and historical research completed during the preparation of this assessment, no information has been revealed that would lead us to believe that an accidental spill or release of pesticide products has occurred at the Subject Property. In addition, the Subject Property has been developed with its current improvements following its previous agricultural uses. It can be inferred that during development activities, shallow soils are disturbed and dispersed during grading and other activities, thereby potentially reducing concentrations of agricultural chemical residues (if present). As such, the potential presence of residual agricultural chemicals in Subject Property soils is not considered to be a recognized environmental condition in connection with the Subject Property.

6.2 Topographic Maps

Our firm reviewed topographic maps from the years 1901, 1942, 1953, 1967, 1973, 1978, 1979, and 2015 obtained by ERIS.

- The Subject Property and surrounding properties are not visible on the 1901 or 1978 topographic maps.
- In 1942, a small water feature (agricultural irrigation pond) is depicted in the southwest portion of the Subject Property. Several small structures are depicted on the northern-adjointing property. No other structures or other features are depicted on the Subject Property or adjoining properties.
- Between 1953 and 2015, a small agricultural irrigation pond and water well are intermittently depicted on the southwest portion of the Subject Property. However, it is noted that aerial photographs indicate these features were no longer present by the late 1990s. Several small structures are depicted on the northern-adjointing property, and the Colorado River Aquaduct is depicted on the southern adjoining property. By 2015, structures are no longer depicted on the northern adjoining property.

None of the features identified on reviewed topographic maps are considered recognized environmental conditions to the Subject Property.

6.3 City Directories

Our firm reviewed city directories ranging in date from 1971 to 2020 provided by ERIS. The Subject Property is not listed prior to 2006-2007. In 2006-2007, Weekend Warrior at 100 Sinclair Street is listed at the Subject Property. Avalon Shutters is listed at 100 Sinclair Street between 2012 and 2016. RecycleWise at 200 Sinclair Street is listed between 2012 and 2020. In 2016, Building Materials Distributors, Inc. is listed at 100 Sinclair Street. Operations at the Subject Property included a recycling center and RV, trailer, wood, window, and door manufacturing. Manufacturing activities were generally limited to cutting, assembly, and painting. None of the listings are considered a recognized environmental condition to the Subject Property.

6.4 Fire Insurance Maps

Given the Environmental Professional's past experience with the area, fire insurance maps are not published for the Subject Property. Furthermore, the historical research objective for purposes of this Phase I ESA has already been achieved.



6.5 Other Historical Sources

Other historical sources are referenced in the ASTM E1527-21 practice as any source or sources other than the standard historical sources referenced in the practice that are credible to a reasonable person and that identify past uses of a subject property. This category includes, but is not limited to miscellaneous maps and directories, newspaper archives, internet sites, community organizations, local libraries, historical societies, current owners or occupants of neighboring properties, or records in the files and/or personal knowledge of the property owner and/or occupants. No historical sources other than the standard sources described above were deemed necessary and useful to assist in identifying recognized environmental conditions.

6.6 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the historical resources reviewed. In addition, historical resources related to the adjoining properties and properties in the vicinity of the Subject Property did not reveal recognized environmental conditions to the Subject Property.



7.0 SUBJECT PROPERTY RECONNAISSANCE

The objective of the reconnaissance is to obtain information indicating the likelihood of identifying recognized environmental conditions in connection with the Subject Property. The Subject Property visit for our assessment was completed on June 21, 2022 by James Wright of our firm. Mr. Wright was unaccompanied during the reconnaissance.

7.1 Methodology and Limiting Conditions

The Subject Property reconnaissance consisted of observing the Subject Property on foot via various transects and walking publicly accessible areas surrounding the Subject Property. No significant limiting conditions of the Subject Property inspection were noted. Select photographs of the Subject Property obtained during the Subject Property reconnaissance are included in Appendix E.

7.2 Current General Subject Property and Vicinity Characteristics

The Subject Property is situated in an area consisting of commercial/light industrial land uses and vacant lots in the City of Perris. The northern portion of the Subject Property at 100 Sinclair Street is currently an unoccupied commercial/light-industrial property. The southern portion of the Subject Property at 200 Sinclair Street is an active glass, plastic, and paper recycling facility (RecycleWise). The current use of the Subject Property and adjoining properties are not ones that are indicative of the use, treatment, storage disposal or generation of hazardous substances or petroleum products that may have impacted the Subject Property.

7.3 Indications of Past Subject Property and Vicinity Uses

There are no material differences between the current and past uses of the Subject Property, adjoining properties and the surrounding area Subject Property that were visually and/or physically observed during the Subject Property reconnaissance that pertain to recognized environmental conditions.

7.4 Subject Property-Specific Observations

We examined the Subject Property for the features and conditions noted in the table below.

Feature or Condition	Details
General Description of Structures	The Subject Property is developed with two two-story light industrial buildings with mezzanine levels. The northern building (100 Sinclair Street) is an estimated 150,000 square feet and the southern building (200 Sinclair Street) is an estimated 45,000 square feet. Both structures were reportedly constructed in 2000. The structures appear to be of concrete masonry and corrugated steel construction and situated on a concrete slab-on-grade foundations. Other portions of the Subject Property consist of asphalt- and concrete-paved driveways and current/former operational areas to the north and south of the two structures, asphalt parking areas to the east and southeast, paved shipping/receiving areas, unpaved storage yards to the west each building, and minor landscaping. Access to the Subject Property is provided by Sinclair Street. Indicators of various utility systems are also present throughout the Subject Property.



Feature or Condition	Details
Drains and Sumps	Typical interior floor drains are present in the restrooms and former maintenance rooms. Floor drains, reportedly leading to an underground clarifier, are present in the southwest building interior and the former spray booth adjacent to the southwest corner of the of the 100 Sinclair Street structure. Exterior floor drains are also present in the former employee break area adjacent to the eastern side of the of the 100 Sinclair Street structure. The drains and clarifier are reportedly connected to the municipal sewer system. No staining, odors or other suspect conditions were noted.
Heating/Cooling Systems	Air-conditioning consists of conventional wall units adjacent to structure office areas. Heating units consist of roof-mounted, forced air systems.
Potable Water Supply	Eastern Municipal Water District.
Roads	North Perris Boulevard is located east of the Subject Property. The Subject Property is accessed via a driveway off North Perris Boulevard at Sinclair Street.
Septic Systems / Sewage Disposal System	Eastern Municipal Water District.
Wastewater and Stormwater Discharges	None observed. Stormwater in the 100 Sinclair Street portion of the Subject Property appears to flow generally east to a discharge pipe located at the eastern edge of the parking area to the adjoining vacant lot. Stormwater in the 200 Sinclair Street portion of the Subject Property appears to flow generally either northeast or southeast away from the structure towards runoff inlets leading to dry well systems north and southeast of the building. No staining, odors or other suspect conditions were noted. As stated previously, the dry well system is not considered to be a recognized environmental condition to the subject Property.
Wells	Dry wells were reportedly installed at the 200 Sinclair Street portion of the Subject Property to the north and southeast of the building for the purpose or stormwater capture. As stated previously, the dry well system is not considered to be a recognized environmental condition to the subject Property.
Drums	Three 55-gallon diesel drums were located west of the 200 Sinclair Street building. The drums were in secondary containment. No staining, odors or other suspect conditions were noted.
Electrical or Hydraulic Equipment Known to Contain PCBs or Likely to Contain PCBs	Two pad-mounted transformers were observed south of the two buildings at the Subject Property. The transformers are owned and maintained by Southern California Edison. A hydraulic hopper/compactor is located in the western warehouse portion of the 200 Sinclair Street building. Based on the Subject Property construction date (2000) it is unlikely these features contain PCB oils. No staining, odors or other suspect conditions were noted.
Hazardous Substances and Petroleum Products in Connection with Identified Uses	Three 55-gallon diesel drums were observed in a storage area west of the 200 Sinclair Street building. Small quantities of paint, epoxy, and hydraulic fluid were also observed in this area. Small, household-size quantities of cleaning products and herbicide (RoundUp/glyphosate) were observed in kitchen areas and storage rooms within the 200 Sinclair Street building. No staining, odors or other suspect conditions were noted.



Feature or Condition	Details
Hazardous Substance and Petroleum Products Not Necessarily in Connection with Identified Uses	None observed.
Odors	None noted.
Pits, Ponds, or Lagoons	None observed.
Pools of Liquid	None observed.
Solid Waste (Including Fill Material)	None observed.
Stained Soil or Pavement	Minor asphalt staining consistent with typical automotive parking areas was observed in the parking lots and unpaved storage areas. This is considered a de minimis condition.
Stains or Corrosion	None observed.
Chemical Storage Tanks	Propane tanks were observed south of the 200 Sinclair Street building. The tanks are retail-sized (approximately 5-gallons in capacity).
Stressed Vegetation	None observed.
Unidentified Substance Containers	None observed.

7.5 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the current use of the Subject Property during the Subject Property reconnaissance. In addition, no current uses of the adjoining properties or properties in the surrounding area that were visually and/or physically observed during the Subject Property reconnaissance were noted as recognized environmental conditions to the Subject Property.



8.0 INTERVIEWS

8.1 Subject Property Owner

The northern portion of the Subject Property is currently owned by the User (owner since 2009) and is unoccupied. The southern portion of the Subject Property (200 Sinclair Street) is owned by K3JH, LLC. The Subject Property owners/User are unaware of environmental concerns in connection with the Subject Property. Information provided by the User has been incorporated into Section 4.0 of this report.

8.2 Key Site Manager

The Subject Property owners/User are also considered to be the Key Site Managers. Please refer to Section 8.1 above.

8.3 Current Occupants

The northern portion of the Subject Property (100 Sinclair Street) is currently unoccupied. The southern portion of the Subject Property (200 Sinclair Street) is occupied by RecycleWise a California recyclables redemption center and recycling processor. The Subject Property occupant is unaware of environmental concerns in connection with the Subject Property.

8.4 Local Government Official

During the preparation of this assessment, public records clerks from the City of Perris and Riverside County were contacted by our firm regarding the Subject Property. Agency representatives indicated that public records requests should be conducted in order to obtain information known by the agencies regarding the Subject Property. Public records requests were completed by our firm as described in Section 5.3.

8.5 Other Parties

Interviews with other persons were not conducted during the preparation of this assessment. As stated in the ASTM E1527-21 practice, interviews with past owners, operators and occupants of a subject property who are likely to have material information regarding the potential for contamination at a given property shall be conducted to the extent that they have been identified and that the information likely to be obtained is not duplicative of information already obtained from other sources. Interviews with persons with past association with the Subject Property were not deemed warranted during the completion of this assessment.

8.6 Summary Relative to Environmental Concerns

No recognized environmental conditions were noted in connection with the interviews completed during the assessment.



9.0 ADDITIONAL SERVICES – NON-SCOPE ASTM CONSIDERATIONS

Several non-scope ASTM considerations are referenced in the ASTM E1527-21 practice that a user of a report may wish to evaluate. Listed considerations in the practice include asbestos-containing building materials, biological agents, cultural and historic resources, ecological resources, endangered species, health and safety, indoor air quality (unrelated to releases of hazardous substances or petroleum products into the environment), industrial hygiene, lead-based paint, lead in drinking water, mold, radon, regulatory compliance, and wetlands. No implication is intended by the practice as to the relative importance of inquiry into such non-scope considerations, and the list of considerations is not intended to be all-inclusive.

Asbestos and Lead-Based Paint – Asbestos and lead-based paint surveys have been completed for the buildings at the Subject Property. The results of the surveys have been provided to the client under separate cover. No asbestos or lead was found at the Subject Property.

Landmark/Historical/Cultural Significance Review - Archeological/cultural and paleontological assessments of the Subject Property have been completed concurrently with this Phase I ESA. The results of the studies have been provided to the client under separate cover. No significant findings were reported.

Lead in Drinking Water - According to the most recent water quality report prepared by the City of Perris, the drinking water supplied to the area is in compliance with all Federal and State regulations.

Mold Screening – Minor water damage was observed in two areas: the mezzanine office area and Marvin office area adjoining the southern edge of the 100 Sinclair Street building. See Appendix E Photographs 22 and 26. Given the planned demolition and redevelopment of the Subject Property, the minor water damage does not warrant further investigation at this time.

National Pollution Discharge Elimination System (NPDES) – The 200 Sinclair Street portion of the Subject Property is subject to NPDES Industrial General Permit Order 2014-0057-DWQ with a Waste Discharger Identification Number 8 331024832. We are unaware of any current NPDES requirements associated with the 100 Sinclair Street portion of the Subject Property. Former Subject Property operations at 100 Sinclair Street were subject to NPDES requirements pertaining to the general industrial and stormwater permits.

Per- and Polyfluoroalkyl Substances (PFAS) – There are no historical or current Subject Property or adjoining property uses that are indicative of scenarios where releases of such compounds have occurred. However, based on a review of the March Air Force Base December 2020 PFAS Site Inspection Report, a PFAS groundwater plume associated with former March Air Force Base operations (Responsible Party) has migrated beneath the northern portion of the Subject Property. The interpolated extent of perfluorooctane sulfonic acid (PFOS) and perfluorooctanoic acid (PFOA) concentrations across all hydrostratigraphic units ranges from 70 to 100 nanograms per liter. Given that PFAS is not a CERCLA hazardous substance and there is no documented or suspected use or release of PFAS at the Subject Property, this finding is not considered to be a recognized environmental condition. Furthermore, groundwater is over 50 feet below the surface and no water wells are present on the Subject Property. The current/future development of the Subject Property is/will be serviced by municipal water sources. The Air Force is the Responsible Party for addressing the documented PFAS groundwater contamination under the oversight of the United States EPA, the RWQCB and the DTSC; therefore, no further action/ investigation is warranted by the User for this finding. The March Air Force Base PFAS plume will not impact the intended utilization of the Subject Property (industrial warehouse building).



Pipelines – Based on a review of the National Pipeline Mapping System. No pipelines used for the conveyance of oil, gas or other hazardous substances are present at the Subject Property.

Radon Potential - The Subject Property is located within United States EPA Radon Zone 2 which has predicted average indoor levels of radon between 2 and 4 picocuries per liter. Radon is not considered to be a concern at the Subject Property.

Wellfield/Groundwater Protection Areas – The Subject Property is not situated in a known wellfield/groundwater protection area.

Wetlands and Threatened/Endangered Species - A biological assessment of the Subject Property has been completed concurrently with this Phase I ESA. The results of the study have been provided to the client under separate cover. No wetlands were noted at the Subject Property and no significant biological findings were reported.



10.0 FINDINGS AND OPINIONS

No features and/or conditions indicating the presence or likely presence of hazardous substances and/or petroleum products at the Subject Property that are considered to have the potential to adversely impact the Subject Property were identified during the completion of this assessment.



11.0 CONCLUSIONS AND RECOMMENDATIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM International Practice E1527-21 of the Subject Property located at 100 and 200 Sinclair Street in the City of Perris, Riverside County, California (Riverside County APNs 303-080-013 and -015). Any exceptions to, or deletions from, this practice are described in Section 1.5 of this report. This assessment has revealed no evidence of recognized environmental conditions, controlled recognized environmental conditions or historical recognized environmental conditions in connection with the Subject Property. Additional assessment at the Subject Property is not considered to be warranted at this time.



12.0 ENVIRONMENTAL PROFESSIONAL STATEMENT

I declare that, to the best of my professional knowledge and belief, I meet the definition of environmental professional as defined in Section 312.10 of 40 CFR. I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Subject Property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312. Qualifications of personnel involved with the completion of this report are included in Appendix F.

A handwritten signature in black ink that reads "Daniel Weis". The signature is written in a cursive, flowing style.

Daniel Weis, R.E.H.S.
Environmental Manager



13.0 ASSUMPTIONS

No Phase I ESA effort can eliminate uncertainty regarding the potential for recognized environmental conditions to exist in connection with a given property. Performance of the ASTM E1527-21 practice may reduce such uncertainty but in no way should the findings and report be misconstrued as insurance or a guarantee regarding the potential for recognized environmental conditions in connection with a given property. The ASTM E1527-21 practice recognizes reasonable limits of time and cost relative to the completion of a Phase I ESA.

During the completion of this ESA, our firm relied on certain information obtained from secondary sources, including but not limited to the user of the report, government agencies, historical research business entities, environmental databases, and interviews with one or more persons. The sources obtained and/or consulted are assumed to be reliable. However, our firm cannot warranty or guarantee that the information provided by these other sources is wholly accurate or complete. Our firm is not responsible for any misrepresentations or false statements that may be provided by others or the lack of pertinent/relevant information that should have been provided/disclosed by others, and we assume no responsibility for any consequence as a result of such omissions or withheld information.

Accuracy and completeness of records varies among information sources, including from governmental agencies. As a result, there is a possibility that even with the proper application of the methodologies presented in ASTM E1527-21, conditions may exist that could not be identified within the scope of this assessment, or which were not reasonably identifiable from the available information. In addition, any responses received from Federal, State, Tribal, and local regulatory agency secondary sources of information after the issuance of this report may change certain findings and conclusions of this report.

Estimations and opinions regarding the potential for off-site properties to adversely impact a given subject property is one of the key components of a Phase I ESA. In most cases, recent property-specific or adjacent-property specific measured groundwater data or other hydrogeological information is not reasonably ascertainable. In the absence of such data, reasonable assumptions regarding the depth and flow of groundwater are made based on various sources including comparisons to surface elevations, land topography and available hydrogeological on the State of California GeoTracker database. In addition, estimations, and opinions regarding potential impacts from off-site locations may be based on certain assumptions that a hazardous substance or petroleum product may not migrate laterally within unsaturated soil for a substantial distance and that contaminants that have reached saturated soil and groundwater may attenuate over time and/or may decrease in concentration relative to distance from its source. While any interpretations presented herein may be effective in reducing uncertainty regarding potential impacts to a subject property from off-site locations, in no way should the findings and report be misconstrued as insurance or a guarantee regarding the potential for such impacts to occur. Greater certainty regarding subsurface conditions at a given property can only be achieved by way of a subsurface sampling effort of one or more media.



14.0 DEFINITIONS

Definitions of key terminology relevant to the ASTM E1527-21 practice are presented below.

Recognized Environmental Condition - The presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

Controlled Recognized Environmental Condition - A recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

Data Failure - A failure to achieve the historical research objectives as outlined in the ASTM E1527-21 practice even after reviewing the standard historical sources that are reasonably ascertainable and likely to be useful. Data failure is one type of data gap.

Data Gap - A lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. Data gaps may result from incompleteness in any of the activities required by the ASTM E1527-21 practice, including, but not limited to site reconnaissance (for example, an inability to conduct the site visit), and interviews (for example, an inability to interview the key site manager, regulatory officials, etc.). Data gaps are only considered to be significant if they affect the ability of the environmental professional to identify recognized environmental conditions.

De Minimis Condition - A condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies. Conditions determined to be de minimis conditions are not recognized environmental conditions nor controlled recognized environmental conditions.

Environment - (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act [16 U.S.C. §§ 1801 et seq.], and (B) any other surface water, groundwater, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.

Good Faith - The absence of any intention to seek an unfair advantage or to defraud another party; an honest and sincere intention to fulfill one's obligations in the conduct or transaction concerned.

Hazardous Substance - Includes hazardous substances designated under section 311 of the Clean Water Act (CWA) or Section 102 of CERCLA, any toxic pollutant listed under Section 307(a) of the CWA, any waste that has been listed as a RCRA hazardous waste or possesses a RCRA hazardous waste characteristic, any substance that is identified as a hazardous pollutant under Section 112 of the Clean Air Act (CAA), and any imminently hazardous chemical that EPA has taken action pursuant to Section 7 of the Toxic Substances Control Act (TSCA).

Historical Recognized Environmental Condition - A past release of any hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority or



meeting unrestricted use criteria established by a regulatory authority, without subjecting the property in question to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).

Petroleum Exclusion – While the definition of a CERCLA hazardous substance specifically excludes petroleum products and crude oil, the EPA has determined that the petroleum exclusion applies to petroleum products such as gasoline and other fuels containing lead, benzene or other hazardous substances that are normally added during the refining process. Notwithstanding the existence of the petroleum exclusion, petroleum products are included within the scope of the ASTM E1527-21 practice for multiple reasons. Petroleum products have historically been widely used at commercial properties. In addition, other federal and state laws may impose liability for releases or spills of petroleum products.

Reasonably Ascertainable Information - Information that is (1) publicly available, (2) obtainable from its source within reasonable time and cost constraints and (3) practically reviewable.

Release or Threatened Release - Spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment (including the abandonment or discarding of barrels, containers and other closed receptacles containing any hazardous substance, or pollutant or contaminant).



15.0 REFERENCES

Sources of information consulted during the completion of our Phase I ESA are noted in the sections below.

15.1 Documents, Plans and Reports

- All Appropriate Inquiry” as necessary to satisfy the defenses available under 42 U.S.C. §§ 9607(b)(3), 9607(r)(1), and 9607(q), relying on definitions provided at 42 U.S.C. §§ 9601(35)(B); and as further explained in 40 CFR §§ 312.1 – 312.31.
- ASTM International, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process," ASTM Designation E 1527-21, 2021
- California Geological Survey, 2002, California Geomorphic Provinces Note 36, Electronic Copy, Revised December.
- California State Water Resources Control Board, Water Quality Control Plan for the Santa Ana River Basin (8), California, Published 2008.
- ERIS Database Report dated June 16, 2022.
- ERIS City Directory Report, Topographic Maps, and Historical Aerials Photographs dated January 28 and 31, 2022.
- USGS topographic map, Perris, California Quadrangle (2018).

15.2 Personal Communications

- Public Records Clerks – City of Perris and County of Riverside

15.3 Agencies Consulted

- California Department of Conservation, Geologic Energy Management Division (CalGEM)
- California Department of Toxic Substances Control
- California State Water Resources Control Board
- City of Perris
- County of Riverside
- United States EPA



FIGURES

FIGURE 1
VICINITY MAP

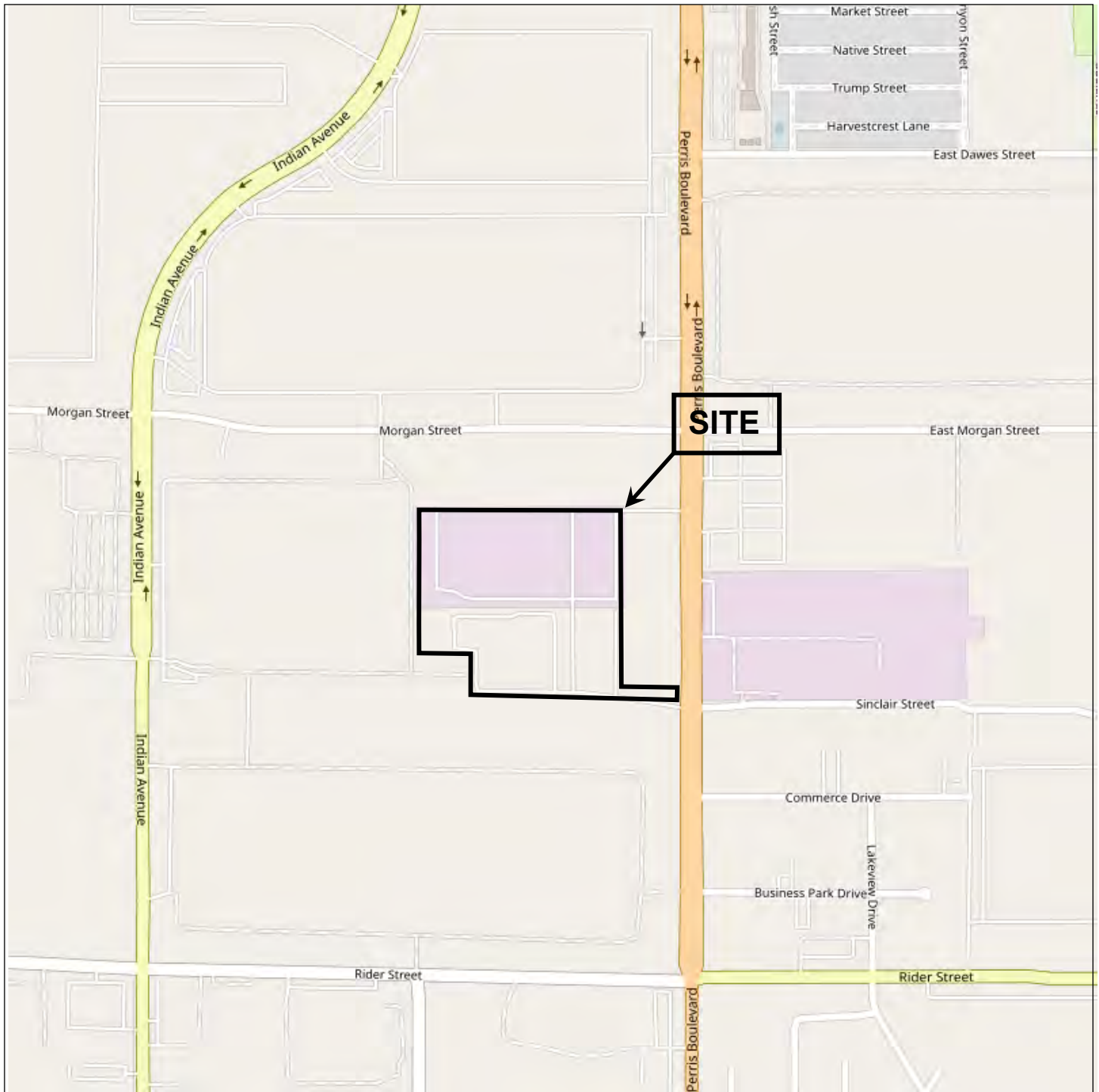


Figure 1 - Vicinity Map

100 and 200 Sinclair Street
 Perris, California



Prepared by:

Weis Environmental
 1938 Kellogg Avenue, Suite 116
 Carlsbad, CA 92008



FIGURE 2
SITE PLAN



Figure 2 - Site Plan

100 and 200 Sinclair Street
Perris, California



Prepared by:

Weis Environmental
1938 Kellogg Avenue, Suite 116
Carlsbad, CA 92008



FIGURE 3
TOPOGRAPHIC MAP



Figure 3 - Topographic Map

100 and 200 Sinclair Street
Perris, California



Prepared by:

Weis Environmental
1938 Kellogg Avenue, Suite 116
Carlsbad, CA 92008



APPENDICES

APPENDIX A
USER PROVIDED INFORMATION



Due Diligence Environmental Questionnaire – *User*

Site Name - 100 and 200 Sinclair Street, Perris, California

Return to dw@weisenviro.com

Completed by: Jacob Kentnich

Company or Organization: First Industrial

Title: Environmental Risk Analyst

Date: June 13, 2022

1.) Are you aware of any environmental cleanup liens that are filed or recorded against the subject property?

No.

2.) Are you aware of any activity and land use limitations that are in place on the property that have been filed or recorded in a registry?

No.

3.) Are you aware of any specialized knowledge or experience related to the property or nearby properties that is pertinent to potential adverse environmental conditions?

No. Please refer to provided reports.

4.) Does the proposed purchase price to be paid reasonably reflect the fair market rate for this type of property?

Yes. However, the 100 Sinclair Street portion of the Subject Property is not for sale.

5.) If there is a significant difference between the proposed purchase price and fair market value, have you considered whether the proposed purchase price is due to known or suspect contamination at the property?

Not applicable.

6.) Are you aware of commonly known or reasonably obtainable information that would help us to identify conditions indicative of releases or threatened releases of hazardous wastes/materials at the property? Such information includes knowledge of specific chemicals that are present or were once present on the property, spills or other chemicals releases that may have occurred, underground or aboveground storage tanks and environmental cleanups that have been conducted on the property.

No. Please refer to provided reports.

7.) Based on your knowledge and experience related to the property, are there any obvious indicators that point to the presence or likely presence of contamination at the property?

No.

**SUBSURFACE SOIL SAMPLING AND TESTING
NATIONAL RV, INC.
3411 N. PERRIS BOULEVARD
PERRIS, CALIFORNIA**

**PROJECT NO. 20533.22
APRIL 28, 1995**

Prepared For:

National RV, Inc.
3411 N. Perris Blvd.
Perris, California 92506

Attn: Mr. Michael Hannah

LOR GEOTECHNICAL GROUP, INC.
Soil Engineering ▲ Geology ▲ Environmental Assessments

April 28, 1995

National RV, Inc.
3411 N. Perris Blvd.
Perris, California 92506

Project No. 20533.22

Attn: Mr. Michael Hannah

LOR Geotechnical Group, Inc., is pleased to present the results of our subsurface sampling and testing at the National RV facility, located at 3411 North Perris Boulevard, Perris, California.

The scope of services provided was based upon our Proposal Letter, dated April 6, 1995, and in other written and verbal communications with your office.

We appreciate the continued opportunity to provide services for this property. If you have any questions or comments regarding this report, please do not hesitate to contact this firm at your convenience.

Respectfully submitted,
LOR Geotechnical Group, Inc.

M. Kevin Osmun
Vice President

:sjv

Distribution: Addressee (3)

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 - BORING LOCATION MAP
- APPENDIX B - BORING LOGS
- APPENDIX C - LABORATORY TEST DATA
 - CHAIN OF CUSTODY

INTRODUCTION

A Phase I Environmental Site Assessment, dated February 2, 1995, conducted for the site by this firm identified several areas of concern that could warrant further investigation. These areas included an: underground storage tank; an area of undercoating overspray; and small spill areas at various locations from resins, petroleum products and other fluids used at the facility. In order to determine if contamination from these areas of concern had occurred, subsurface soil samples were obtained within these areas for testing.

SAMPLING PROCEDURE

The subsurface soil samples were obtained on April 14, 1995 using shallow soil borings placed at the site. Two borings were placed around the underground storage tank. Additional borings were placed at the location of the waste storage area, the overspray area and within the plant at the previous storage area of transmission and hydraulic fluid. The concrete slab-on-grade or asphalt concrete was cored and borings were hand augured down to a maximum depth of 15-feet. Soil samples were obtained by driving a soil sampler lined with brass rings at the desired sample depth. The first brass ring was visually examined for signs of staining, discoloration, or odors and discarded. The second ring was sealed with a Teflon liner, capped, and placed in a cooler with ice for transport to the laboratory. Chain-of-custody (CoC) documentation was maintained and accompanied the samples to the laboratory. The approximate locations of our borings are presented on Enclosure A-2, within Appendix A. Color photographs of the boring locations are also presented within Appendix A.

To minimize the chance of cross-contamination between samples, all sampling equipment was decontaminated prior to its use and between sampling. All sampling equipment was decontaminated in the following manner:

- Wash with water and detergent solution
- Rinse twice with tap water
- Rinse twice with distilled water

All field work was documented in the following manner. The sample labels were filled out with the sample number, location, depth, requested analysis, and the date and time of sampling. Upon delivery of the samples to the laboratory for analysis, the CoC's were signed by authorized personnel and a copy was retained by LOR. The samples were tested by Del Mar Analytical, a State Certified Hazardous Waste testing laboratory.

The quality assurance/quality control (QA/QC) program in effect during the performance of all field activities included the following items:

- Complete documentation of all field activities.
- Use of appropriate CoC forms.
- Use of clean sample equipment.
- Proper equipment decontamination according to accepted EPA Protocol.

Underground Storage Tank

The area of the underground storage tank (UST) was investigated by placing a boring near each end of the tank. Information obtained by an employee familiar with the tank installation indicated the hole for the tank was excavated by a dozer with an approximate 10-foot wide blade. He indicated the tank was a narrow 8000-gallon tank oriented in the north-south direction. Tank access covers, at each end of the tank, 10-feet apart were used to estimate the length of the tank. The underground storage tank was located approximately 25-feet east of the gas pump.

Boring No. 1 was excavated 3-feet south, and 5-feet west, of the southern end of the tank. At the 3-foot depth, gravel backfill was encountered in the boring and due to caving no further progress could be made. Boring No. 1 was then relocated 3-feet west (8' total). No gravel was encountered and the boring was excavated to 15-feet deep. Boring No. 2 was excavated 7-feet east of the northern end of the tank and was excavated to 15-feet with no gravel backfill encountered. Soil samples were obtained in both borings at 5-foot intervals to a depth of 15-feet.

Waste Storage Area

One boring was placed at the rear (west side) of the fiberglass/lamination shop where the storage of waste barrels of dibasic ester and resins from the fiberglass/lamination manufacturing was conducted. The barrels were stored on asphalt concrete. Boring No. 3 was excavated to a depth of 15-feet with samples obtained at 5-foot intervals.

Undercoating Overspray Area

The undercoating overspray area is located between the fiberglass/lamination building and the main assembly building. The asphalt concrete in the area had approximately 1/4-inch of built up undercoating on it. Boring No. 4 was placed in this area. The boring was excavated to 15-feet with samples obtained at 5-foot intervals.

Main Building Area

One boring, Boring No. 5, was placed at the east end of the main assembly building where transmission fluid and oil were previously stored. At this time there were no drums of petroleum products stored on this area. Our boring was excavated to 15-feet with samples obtained at 5-foot intervals.

The Boring Logs for each of the borings are presented within Appendix B.

TEST RESULTS

Laboratory testing was conducted by Del Mar Analytical, Inc., a certified hazardous waste testing laboratory. In the laboratory, samples taken at depths of 10-feet in Boring Nos. 1 and 2, placed at the UST, were analyzed for the presence of Volatile Fuel Hydrocarbons in accordance with EPA method 8015 modified for gasoline and volatile organics (BTEX) EPA method 8020. Soil samples obtained at the 5-foot depth within the other three borings were analyzed for halogenated and aromatic volatile organic compounds, EPA method 8020. The test results are tabulated below with the laboratory test data sheets and CoC presented within Appendix C.

LOCATION	SAMPLE NO.	DEPTH	VOLATILE HYDROCARBONS	BTEX	HALOGENATED/ AROMATIC COMPOUNDS
B-1	B1-S-10	10	ND	ND	--
B-2	B2-S-10	10	ND	ND	--
B-3	B3-S-5	5	--	--	ND
B-4	B4-S-5	5	--	--	ND
B-5	B5-S-5	5	--	--	ND

ND - None Detected at the Detection Limits

CONCLUSIONS

A visual examination of the subsurface soils within the borings did not reveal any indication of contamination. The laboratory test results of None Detected indicate no subsurface soil contamination is present at the locations bored at the site within the current detection limits. The several areas of spillage noted during our Phase I Investigation do not appear to have resulted in significant amounts of the spilled materials migrating into the subsoil. Management practices which immediately pickup any spilled materials appear to have been effective in the past and should be continued.

LIMITATIONS

LOR Geotechnical Group, Inc. has performed our services within the limits prescribed by our client, with the usual thoroughness and competence of the Environmental profession. LOR Geotechnical Group, Inc. (LOR) makes no other warranty or representation, either express or implied.

The conclusions in this report are based upon the data obtained from our limited number of borings and surface observations. LOR does not guarantee the accuracy or completeness of any information provided nor shall LOR be responsible for errors, omissions or damages arising out of the use of this information. The information obtained was solely for the project and scope of services described.

Union Bank
April 28, 1995

Project No. 20533.22

This report and the contents resulting from this evaluation are not intended or represented to be suitable for extensions or modifications of the project area, or for use on any other project.

CLOSURE

We appreciate this opportunity to be of service and trust this report provides the information desired at this time. Should questions arise, please do not hesitate to contact this office.

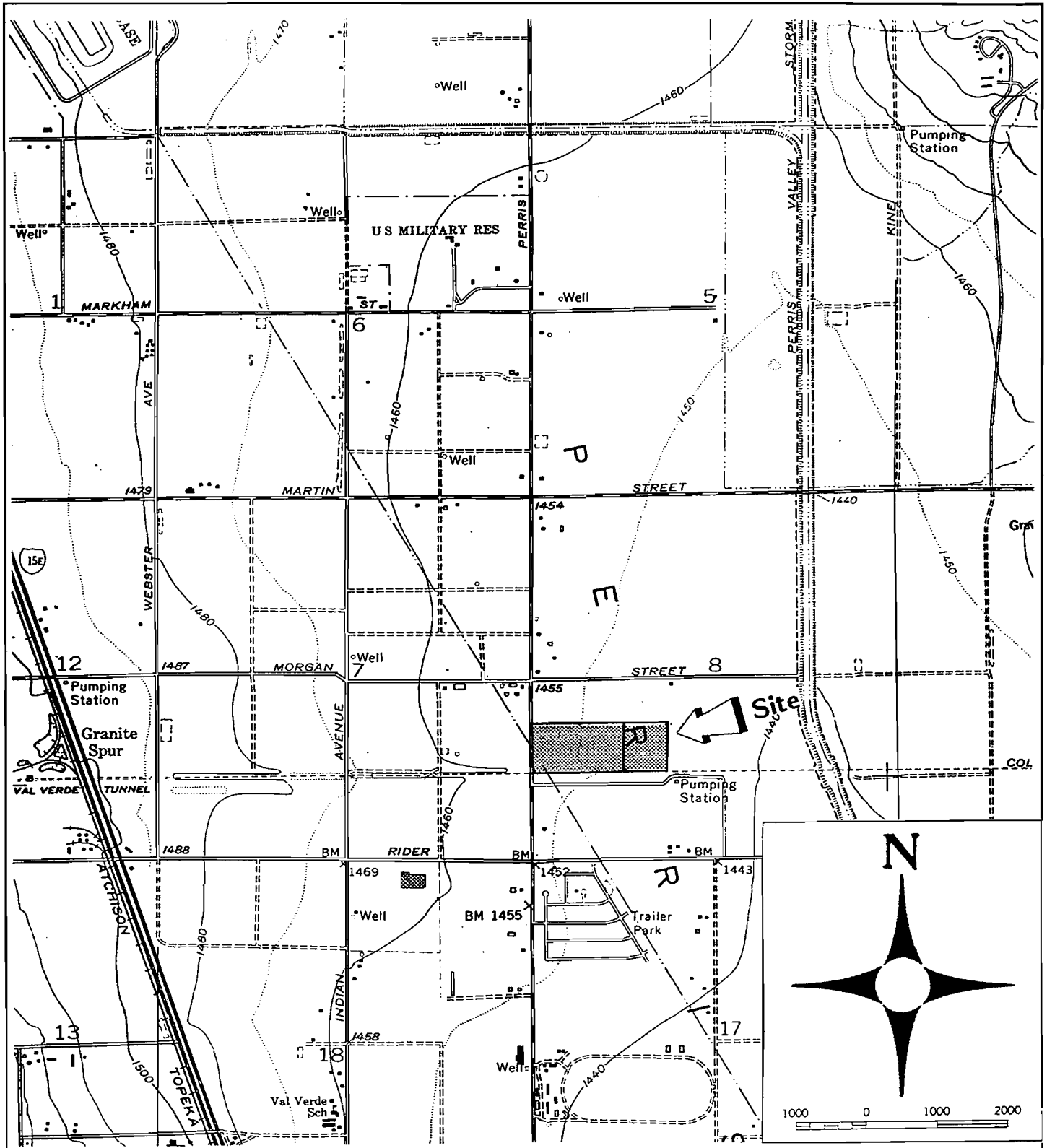
Respectfully submitted,
LOR Geotechnical Group, Inc.

Jeffrey J. Johnston
Project Geologist

M. Kevin Osmun, REA 642
Vice President

:sjj

APPENDIX A



INDEX MAP

PROJECT: NATIONAL RV, INC., PERRIS, CALIFORNIA

PROJECT NO.: 20533.22

CLIENT: NATIONAL RV, INC.

ENCLOSURE NO.: A-1

LOR Geotechnical Group, Inc.

DATE: APRIL 28, 1995

SCALE: AS SHOWN

PERRIS BLVD.

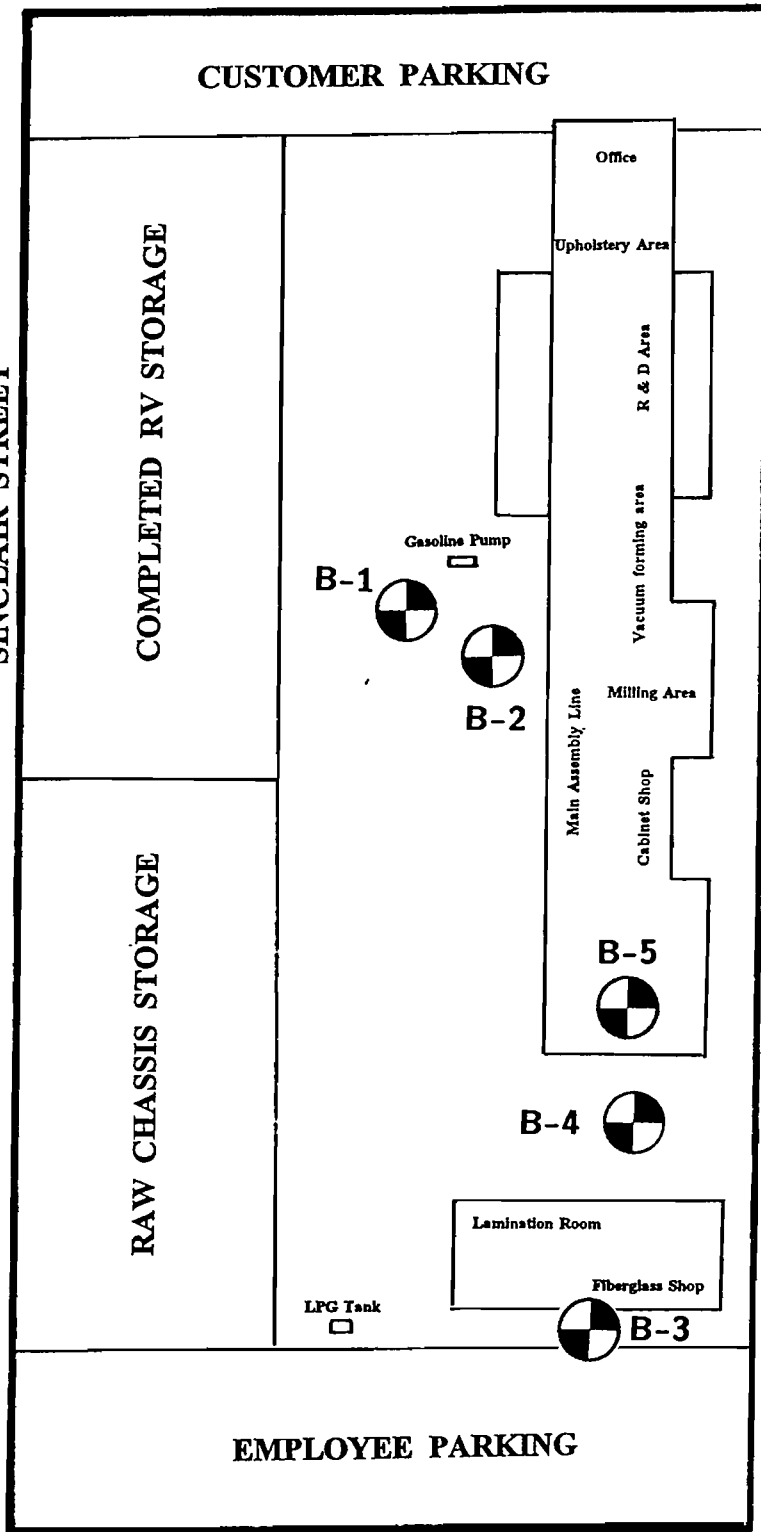
CUSTOMER PARKING

SINCLAIR STREET

COMPLETED RV STORAGE

RAW CHASSIS STORAGE

EMPLOYEE PARKING



LEGEND:

 - INDICATES BORING LOCATION

BORING LOCATION MAP

PROJECT: NATIONAL RV, INC., PERRIS, CALIFORNIA

PROJECT NO.: 20533.22

CLIENT: NATIONAL RV, INC.

ENCLOSURE NO.: A-2

LOR Geotechnical Group, Inc.

DATE: APRIL 28, 1995

SCALE: NO SCALE

APPENDIX B

CONSISTENCY OF SOILS

SANDS

SPT BLOWS CONSISTENCY

0 - 4	Very loose
4 - 10	Loose
10 - 30	Medium dense
30 - 50	Dense
Over 50	Very dense

COHESIVE SOILS

SPT BLOWS CONSISTENCY

0 - 2	Very soft
2 - 4	Soft
4 - 8	Medium
8 - 15	Stiff
15 - 30	Very stiff
30 - 60	Hard
Over 60	Very Hard

MAJOR DIVISIONS			LITHO- LOGY	U.S. C.S.	TYPICAL DESCRIPTIONS
COARSE GRAINED SOILS	GRAVEL AND GRAVELLY SOILS	CLEAN GRAVELS (LITTLE OR NO FINES)		GW	WELL-GRADED GRAVELS, GRAVEL-SAND MIXTURES, LITTLE OR NO FINES
		MORE THAN 50% OF COARSE FRACTION RETAINED ON NO. 4 SIEVE		GRAVELS WITH FINES (APPRECIABLE AMOUNT OF FINES)	GP
	SAND AND SANDY SOILS	CLEAN SAND (LITTLE OR NO FINES)		SW	WELL-GRADED SANDS, GRAVELLY SANDS, LITTLE OR NO FINES
		MORE THAN 50% OF COARSE FRACTION PASSING NO. 4 SIEVE		SANDS WITH FINES (APPRECIABLE AMOUNT OF FINES)	SP
FINE GRAINED SOILS	SILTS AND CLAYS	LIQUID LIMIT LESS THAN 50	SM	SILTY SAND, SAND-SILT MIXTURES	
			SC	CLAYEY SANDS, SAND-CLAY MIXTURES	
	SILTS AND CLAYS	LIQUID LIMIT GREATER THAN 50	ML	INORGANIC SILTS AND VERY FINE SANDS, ROCK FLOUR, SILTY OR CLAYEY FINE SANDS OR CLAYEY SILTS WITH SLIGHT PLASTICITY	
			CL	INORGANIC CLAYS OF LOW TO MEDIUM PLASTICITY, GRAVELLY CLAYS, SANDY CLAYS, SILTY CLAYS, LEAN CLAYS	
HIGHLY ORGANIC SOILS	SILTS AND CLAYS	LIQUID LIMIT GREATER THAN 50	OL	ORGANIC SILTS AND ORGANIC SILTY CLAYS OF LOW PLASTICITY	
			MH	INORGANIC SILTS, MICACEOUS OR DIATOMACEOUS FINE SAND OR SILTY SOILS	
			CH	INORGANIC CLAYS OF RICH PLASTICITY, FAT CLAYS	
			OH	ORGANIC CLAYS OF MEDIUM TO HIGH PLASTICITY, ORGANIC SILTS	
			PT	PEAT, HUMUS, SWAMP SOILS WITH HIGH ORGANIC CONTENTS	

SAMPLING KEY

SYMBOL DESCRIPTION

- FOR BORINGS — INDICATES RELATIVELY UNDISTURBED SOIL SAMPLE RETAINED IN BRASS SAMPLE RINGS OF 2.41 INCHES DIAMETER AND 1.00 INCH IN HEIGHT.
- FOR TRENCHES — INDICATES SAND CONE OR NUCLEAR DENSITY TEST
- INDICATES BAG SOIL SAMPLE
- INDICATES BULK SOIL SAMPLE

NOTE: DUAL SYMBOLS ARE USED TO INDICATE BORDERLINE SOIL CLASSIFICATIONS.

PARTICLE SIZE LIMITS

BOULDERS	COBBLES	GRAVEL		SAND			SILT OR CLAY
		COARSE	FINE	COARSE	MEDIUM	FINE	
12"	3"	¾"	No. 4	No. 10	No. 40	200	

(U.S. STANDARD SIEVE SIZE)

UNIFIED SOIL CLASSIFICATION SYSTEM

PROJECT: NATIONAL RV FACILITY, PERRIS, CA.	PROJECT NO.: 20533.22
CLIENT: NATIONAL RV, INC.	DATE: APRIL 28, 1995
LOR GEOTECHNICAL GROUP, INC.	ENCLOSURE NO.: B

LOG OF BORING 1

TEST DATA							LITHOLOGY	U.S.C.S	DESCRIPTION
DEPTH IN FEET	SPT BLOW COUNTS	SAND EQUIVALENT	MOISTURE CONTENT (%)	DRY DENSITY (PCF)	SAMPLE TYPE				
0							SM	5 1/2" CONCRETE SILTY SAND, fine to medium, with coarse, moist, brown.	
5					////		ML	SANDY fine SILT, moist, brown. Sample B1-S-5	
10					////		SM	SILTY SAND, fine, with medium and coarse, moist, brown.	
							ML	SANDY SILT, fine grained, with medium, moist, brown. Sample B1-S-10	
							SP	SAND, fine to medium, with traces of coarse, damp, brown.	
15					////		ML	SANDY SILT, fine grained, wet, brown. Sample B1-S-15	
								END OF BORING No groundwater	






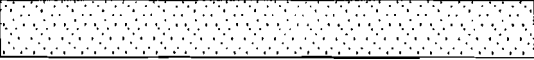


PROJECT:	National RV Facility	PROJECT NUMBER:	20533.22
CLIENT:	National RV, Inc.	DATE DRILLED:	April 14, 1995
LOR GEOTECHNICAL GROUP INC.	EQUIPMENT:	Hand Auger	
	HOLE DIA.:	3"	ENCLOSURE: B-1

LOG OF BORING 2

TEST DATA							U.S.C.S	DESCRIPTION
DEPTH IN FEET	SPT BLOW COUNTS	SAND EQUIVALENT	MOISTURE CONTENT (%)	DRY DENSITY (PCF)	SAMPLE TYPE	LITHOLOGY		
0						SM	6" CONCRETE	SILTY SAND, fine grained, with medium, moist, brown.
5					//	SP	SAND, fine to medium, with coarse, damp, brown.	With coarse. Sample B2-S-5
10					//	SM	SAND, fine to medium, with coarse, damp, brown.	SILTY SAND, fine to medium, with coarse, moist, brown. Sample B2-S-10
15						SP	SAND, fine to medium.	Becomes grey brown. Sample B2-S-15
							END OF BORING	No groundwater

PROJECT:	National RV Facility	PROJECT NUMBER:	20533.22
CLIENT:	National RV, Inc.	DATE DRILLED:	April 14, 1995
LOR GEOTECHNICAL GROUP INC.		EQUIPMENT:	Hand Auger
		HOLE DIA.: 3"	ENCLOSURE: B-2

LOG OF BORING 3

TEST DATA						LITHOLOGY	U.S.C.S	DESCRIPTION
DEPTH IN FEET	SPT BLOW COUNTS	SAND EQUIVALENT	MOISTURE CONTENT (%)	DRY DENSITY (PCF)	SAMPLE TYPE			
0							SM	2 1/2" ASPHALT/4" Class 3 Base
5							SP	SAND, fine to medium, with coarse, moist, brown. Sample B3-S-5
10							SM	SAND, fine to medium, with coarse, moist, brown. Sample B3-S-10
15							ML	SANDY SILT, fine, moist, grey brown. Sample B3-S-15
								END OF BORING No groundwater

PROJECT: National RV Facility	PROJECT NUMBER: 20533.22
CLIENT: National RV, Inc.	

LOR GEOTECHNICAL GROUP INC.	
DATE DRILLED: April 14, 1995	EQUIPMENT: Hand Auger
HOLE DIA.: 3"	ENCLOSURE: B-3

LOG OF BORING 4

TEST DATA							LITHOLOGY	U.S.C.S	DESCRIPTION
DEPTH IN FEET	SPT BLOW COUNTS	SAND EQUIVALENT	MOISTURE CONTENT (%)	DRY DENSITY (PCF)	SAMPLE TYPE				
0							ML	2 1/2" ASPHALT/4" Class 3 Base	
								SANDY SILT, fine grained, moist, brown.	
							SM	SILTY SAND, fine, with medium and coarse, moist, brown.	
5								Sample B4-S-5	
							SP	SAND, fine, with medium and coarse, moist, grey brown.	
10							SM	SILTY SAND, fine to medium, with coarse, moist, brown.	
								Sample B4-S-10	
							SP	SAND, fine to medium, with coarse, damp, brown.	
15								Sample B4-S-15	
								END OF BORING	
								No groundwater	

PROJECT:	National RV Facility	PROJECT NUMBER:	20533.22
CLIENT:	National RV, Inc.	DATE DRILLED:	April 14, 1995
LOR GEOTECHNICAL GROUP INC.	EQUIPMENT:	Hand Auger	
	HOLE DIA.:	3"	ENCLOSURE:
			B-4

LOG OF BORING 5

TEST DATA		DEPTH IN FEET	DESCRIPTION			
SPT BLOW COUNTS	SAND EQUIVALENT			MOISTURE CONTENT (%)	DRY DENSITY (PCF)	SAMPLE TYPE
		0	<p style="text-align: center;">5 1/4" Concrete.</p> <p style="text-align: center;">SM SILTY SAND, fine, with medium, moist, brown.</p>			
		5	<p style="text-align: center;">Sample B5-S-5</p> <p style="text-align: center;">Fine to medium with coarse.</p>			
		10	<p style="text-align: center;">Sample B5-S-10</p> <p style="text-align: center;">SP SAND, fine to medium, with coarse, moist, brown.</p>			
		15	<p style="text-align: center;">Sample B5-S-15</p> <p style="text-align: center;">END OF BORING</p> <p style="text-align: center;">No groundwater</p>			

PROJECT: National RV Facility	PROJECT NUMBER: 20533.22
CLIENT: National RV, Inc.	

LOR GEOTECHNICAL GROUP INC.	
DATE DRILLED: April 14, 1995	EQUIPMENT: Hand Auger
HOLE DIA.: 3"	ENCLOSURE: B-5

APPENDIX C



LOR Geotechnical Group, Inc. 6121 Quail Valley Court Riverside, CA 92507 Attention: M. Kevin Osmun	Client Project ID: National RV 10533.22 Analysis Method: EPA 5030/CA DHS Mod. 8015/8020 First Sample #: 5040363	Sampled: Apr 14, 1995 Received: Apr 14, 1995 Analyzed: Apr 19, 1995 Reported: Apr 20, 1995
---	--	---

VOLATILE FUEL HYDROCARBONS/BTEX DISTINCTION (CA DHS Mod. EPA 8015/8020)

Laboratory Number	Sample Description Soil	Volatile Fuel Hydrocarbons mg/Kg (ppm)	Benzene mg/Kg (ppm)	Toluene mg/Kg (ppm)	Ethyl Benzene mg/Kg (ppm)	Total Xylenes mg/Kg (ppm)
5040363	B1-S-10	N.D.	N.D.	N.D.	N.D.	N.D.
5040368	B2-S-10	N.D.	N.D.	N.D.	N.D.	N.D.
Method Blank		N.D.	N.D.	N.D.	N.D.	N.D.

Detection Limit:	1.0	0.0050	0.0050	0.0050	0.015
-------------------------	------------	---------------	---------------	---------------	--------------

Volatile Fuel Hydrocarbons are quantitated against a gasoline standard. Hydrocarbons detected by this method range from C8 to C15.

Analytes reported as N.D. were not present above the stated limit of detection.

DEL MAR ANALYTICAL, COLTON (ELAP #1169)

**Alma Borcuk
Laboratory Manager**

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 2465 W. 12th St., Suite 1, Tempe, AZ 85281 (602) 968-8272 FAX (602) 968-1338

LOR Geotechnical Group, Inc. 8121 Quail Valley Court Riverside, CA 92507 Attention: M. Kevin Osmun	Client Project ID: National RV 10533.22 Sample Descript: Soil, B3-S-5 Lab Number: 5040368	Sampled: Apr 14, 1995 Received: Apr 14, 1995 Analyzed: Apr 17, 1995 Reported: Apr 20, 1995
---	--	---

HALOGENATED AND AROMATIC VOLATILES (EPA 8010/8020)

Analyte	Detection Limit µg/Kg (ppb)	Sample Result µg/Kg (ppb)
Bromodichloromethane.....	5.0	N.D.
Bromoform.....	5.0	N.D.
Bromomethane.....	5.0	N.D.
Carbon tetrachloride.....	5.0	N.D.
Chlorobenzene.....	5.0	N.D.
Chloroethene.....	25	N.D.
2-Chloroethylvinyl ether.....	25	N.D.
Chloroform.....	5.0	N.D.
Chloromethane.....	10	N.D.
Dibromochloromethane.....	5.0	N.D.
1,2-Dichlorobenzene.....	10	N.D.
1,3-Dichlorobenzene.....	10	N.D.
1,4-Dichlorobenzene.....	10	N.D.
1,1-Dichloroethane.....	5.0	N.D.
1,2-Dichloroethane.....	5.0	N.D.
1,1-Dichloroethene.....	5.0	N.D.
cis-1,2-Dichloroethane.....	5.0	N.D.
trans-1,2-Dichloroethane.....	5.0	N.D.
1,2-Dichloropropane.....	5.0	N.D.
cis-1,3-Dichloropropene.....	5.0	N.D.
trans-1,3-Dichloropropene.....	5.0	N.D.
Methylene chloride.....	10	N.D.
1,1,2,2-Tetrachloroethane.....	5.0	N.D.
Tetrachloroethane.....	5.0	N.D.
1,1,1-Trichloroethane.....	5.0	N.D.
1,1,2-Trichloroethane.....	5.0	N.D.
Trichloroethene.....	5.0	N.D.
Trichlorofluoromethane.....	5.0	N.D.
Vinyl Chloride.....	5.0	N.D.
Benzene.....	5.0	N.D.
Ethylbenzene.....	5.0	N.D.
Toluene.....	5.0	N.D.
Total Xylenes.....	10	N.D.

* PID/ELCD were used in series for this analysis.

Analytes reported as N.D. were not present above the stated limit of detection.

DEL MAR ANALYTICAL, COLTON (ELAP #1169)

Alma Borcuk
Laboratory Manager

Surrogate Standard Recoveries:
1-Chloro-2-fluorobenzene.....86%

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LOR Geotechnical Group, Inc.	Client Project ID: National RV	Sampled: Apr 14, 1995
6121 Quail Valley Court	10533-22	Received: Apr 14, 1995
Riverside, CA 92507	Sample Descript: Soil, B4-S-5	Analyzed: Apr 17, 1995
Attention: M. Kevin Osmun	Lab Number: 5040371	Reported: Apr 20, 1995

HALOGENATED AND AROMATIC VOLATILES (EPA 8010/8020)

Analyte	Detection Limit	Sample Result
	µg/Kg (ppb)	
Bromodichloromethane.....	5.0	N.D.
Bromoform.....	5.0	N.D.
Bromomethane.....	5.0	N.D.
Carbon tetrachloride.....	5.0	N.D.
Chlorobenzene.....	5.0	N.D.
Chloroethane.....	25	N.D.
2-Chloroethylvinyl ether.....	25	N.D.
Chloroform.....	5.0	N.D.
Chloromethane.....	10	N.D.
Dibromochloromethane.....	5.0	N.D.
1,2-Dichlorobenzene.....	10	N.D.
1,3-Dichlorobenzene.....	10	N.D.
1,4-Dichlorobenzene.....	10	N.D.
1,1-Dichloroethane.....	5.0	N.D.
1,2-Dichloroethane.....	5.0	N.D.
1,1-Dichloroethene.....	5.0	N.D.
cis-1,2-Dichloroethene.....	5.0	N.D.
trans-1,2-Dichloroethene.....	5.0	N.D.
1,2-Dichloropropane.....	5.0	N.D.
cis-1,3-Dichloropropene.....	5.0	N.D.
trans-1,3-Dichloropropene.....	5.0	N.D.
Methylene chloride.....	10	N.D.
1,1,2,2-Tetrachloroethane.....	5.0	N.D.
Tetrachloroethene.....	5.0	N.D.
1,1,1-Trichloroethane.....	5.0	N.D.
1,1,2-Trichloroethane.....	5.0	N.D.
Trichloroethene.....	5.0	N.D.
Trichlorofluoromethane.....	5.0	N.D.
Vinyl Chloride.....	5.0	N.D.
Benzene.....	5.0	N.D.
Ethylbenzene.....	5.0	N.D.
Toluene.....	5.0	N.D.
Total Xylenes.....	10	N.D.

* PID/EI/CD were used in series for this analysis.

Analytes reported as N.D. were not present above the stated limit of detection.

DEL MAR ANALYTICAL, COLTON (ELAP #1169)

Alma Borcuk
Laboratory Manager

Surrogate Standard Recoveries:	
1-Chloro-2-fluorobenzene.....	84%

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LOR Geotechnical Group, Inc. 6121 Quail Valley Court Riverside, CA 92507 Attention: M. Kevin Osmun	Client Project ID: National RV 10533.22 Sample Descript: Soil, B5-S-5 Lab Number: 5040374	Sampled: Apr 14, 1995 Received: Apr 14, 1995 Analyzed: Apr 17, 1995 Reported: Apr 20, 1995
---	--	---

HALOGENATED AND AROMATIC VOLATILES (EPA 8010/8020)

Analyte	Detection Limit	Sample Result
	µg/Kg (ppb)	
Bromodichloromethane.....	5.0	N.D.
Bromoform.....	5.0	N.D.
Bromomethane.....	5.0	N.D.
Carbon tetrachloride.....	5.0	N.D.
Chlorobenzene.....	5.0	N.D.
Chloroethane.....	25	N.D.
2-Chloroethylvinyl ether.....	25	N.D.
Chloroform.....	5.0	N.D.
Chloromethane.....	10	N.D.
Dibromochloromethane.....	5.0	N.D.
1,2-Dichlorobenzene.....	10	N.D.
1,3-Dichlorobenzene.....	10	N.D.
1,4-Dichlorobenzene.....	10	N.D.
1,1-Dichloroethane.....	5.0	N.D.
1,2-Dichloroethane.....	5.0	N.D.
1,1-Dichloroethene.....	5.0	N.D.
cis-1,2-Dichloroethene.....	5.0	N.D.
trans-1,2-Dichloroethene.....	5.0	N.D.
1,2-Dichloropropane.....	5.0	N.D.
cis-1,3-Dichloropropene.....	5.0	N.D.
trans-1,3-Dichloropropene.....	5.0	N.D.
Methylene chloride.....	10	N.D.
1,1,2,2-Tetrachloroethane.....	5.0	N.D.
Tetrachloroethane.....	5.0	N.D.
1,1,1-Trichloroethane.....	5.0	N.D.
1,1,2-Trichloroethane.....	5.0	N.D.
Trichloroethene.....	5.0	N.D.
Trichlorofluoromethane.....	5.0	N.D.
Vinyl Chloride.....	5.0	N.D.
Benzene.....	5.0	N.D.
Ethylbenzene.....	5.0	N.D.
Toluene.....	5.0	N.D.
Total Xylenes.....	10	N.D.

* PID/ELCD were used in series for this analysis.

Analytes reported as N.D. were not present above the stated limit of detection.

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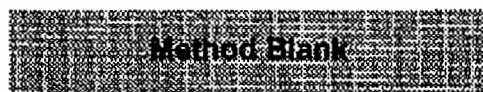
Alma Borcuk
Laboratory Manager

Surrogate Standard Recoveries:	
1-Chloro-2-fluorobenzene.....	90%

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LOR Geotechnical Group, Inc.
6121 Quail Valley Court
Riverside, CA 92507
Attention: M. Kevin Osmun



Analyzed: Apr 17, 1995
Reported: Apr 20, 1995
Matrix: Soil

HALOGENATED AND AROMATIC VOLATILES (EPA 8010/8020)

Analyte	Detection Limit		Sample Result
	µg/Kg	(ppb)	
Bromodichloromethane.....	5.0	N.D.
Bromoform.....	5.0	N.D.
Bromomethane.....	5.0	N.D.
Carbon tetrachloride.....	5.0	N.D.
Chlorobenzene.....	5.0	N.D.
Chloroethane.....	25	N.D.
2-Chloroethylvinyl ether.....	25	N.D.
Chloroform.....	5.0	N.D.
Chloromethane.....	10	N.D.
Dibromochloromethane.....	5.0	N.D.
1,2-Dichlorobenzene.....	10	N.D.
1,3-Dichlorobenzene.....	10	N.D.
1,4-Dichlorobenzene.....	10	N.D.
1,1-Dichloroethane.....	5.0	N.D.
1,2-Dichloroethane.....	5.0	N.D.
1,1-Dichloroethene.....	5.0	N.D.
cis-1,2-Dichloroethene.....	5.0	N.D.
trans-1,2-Dichloroethene.....	5.0	N.D.
1,2-Dichloropropane.....	5.0	N.D.
cis-1,3-Dichloropropene.....	5.0	N.D.
trans-1,3-Dichloropropene.....	5.0	N.D.
Methylene chloride.....	10	N.D.
1,1,2,2-Tetrachloroethane.....	5.0	N.D.
Tetrachloroethene.....	5.0	N.D.
1,1,1-Trichloroethane.....	5.0	N.D.
1,1,2-Trichloroethane.....	5.0	N.D.
Trichloroethene.....	5.0	N.D.
Trichlorofluoromethane.....	5.0	N.D.
Vinyl Chloride.....	5.0	N.D.
Benzene.....	5.0	N.D.
Ethylbenzene.....	5.0	N.D.
Toluene.....	5.0	N.D.
Total Xylenes.....	10	N.D.

* PID/EI/CD were used in series for this analysis.

Analytes reported as N.D. were not present above the stated limit of detection.

DEL MAR ANALYTICAL, COLTON (ELAP #1169)

Alma Borcuk
Laboratory Manager

Surrogate Standard Recoveries:	
1-Chloro-2-fluorobenzene.....	82%

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1 of 2

CHAIN OF CUSTODY/REQUEST FOR ANALYSIS

37946

Client Name/Address: LOR GEOTECHNICAL Group 6121 QUAIL VALLEY CT RIVERVIEW CA 92207			Project: NATIONAL RV 10533.22			Analysis Required									
Project Manager: M. KEVIN OSMUN			Sampler: M. KEVIN OSMUN			<div style="display: flex; justify-content: space-between;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">8020/8015 (GAS) Fuel Tank Package</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">8020</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">8010</div> <div style="border: 1px solid black; padding: 5px; text-align: center;"> SAVE SAMPLE TUBES <hr/> OBTAIN SAMPLE FROM LABEL END OF TUBE Special Instructions </div> </div>									
Sample Description	Sample Matrix	Container Type	# of Cont	Sampling Date/Time	Preservatives										
B1-S-5	Soil	1" BMSS	1	4-14-95 3:50 PM	chilled									Hold	
B1-S-10	[Large bracket spanning rows B1-S-10 to B3-S-15]	[Large bracket spanning rows B1-S-10 to B3-S-15]	1	9:03 AM		X									
B1-S-15			1	9:22 AM										Hold	
B2-S-5			1	9:41 AM											Hold
B2-S-10			1	9:55 AM			X								
B2-S-15			1	10:20 AM											Hold
B3-S-5			1	11:23 AM				X	X						
B3-S-10			1	11:28 AM											Hold
B3-S-15			1	11:32 AM											Hold
Relinquished By: <i>[Signature]</i>			Date/Time: 4-14-95 3:50 pm			Received By:			Date/Time:			Turnaround Time: (check)			
Relinquished By:			Date/Time:			Received By:			Date/Time:			same day _____ 72 hours _____ 24 hours _____ 5 days _____ 48 hours _____ normal <input checked="" type="checkbox"/>			
Relinquished By:			Date/Time:			Received in Lab By:			Date/Time:			Sample Integrity: (check)			
Relinquished By:			Date/Time:			Received in Lab By:			Date/Time:			intact <input checked="" type="checkbox"/> on ice <input checked="" type="checkbox"/>			

Note: Samples will be disposed of after 30 days.



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2 of 2

CHAIN OF CUSTODY/REQUEST FOR ANALYSIS

37947

Client Name/Address: AAR Geotechnical Corp			Project: NATIONAL RV 10533.22			Analysis Required																	
Project Manager:			Sampler:			8080		8010		SAVE SAMPLE TUBES OBTAIN SAMPLE FROM LABEL END OF TUBE Special Instructions													
Sample Description	Sample Matrix	Container Type	# of Cont	Sampling Date/Time	Preservatives																		
B4-S-5	SOIL	1" BACU	1	4-14-95 / 2:20 PM	Chilled	X	X																
B4-S-10)	(1	11:30 PM)															Hold			
B4-S-15			1	12:53 PM																		Hold	
B5-S-5			1	1:22 PM		X	X																
B5-S-10			2 1/2" SS	1		1:37 PM																	Hold
B5-S-15			2 1/2" SS	1		1:50 PM																	Hold
Relinquished By: <i>[Signature]</i>				Date/Time: 4-14-95 3:50 PM		Received By:				Date/Time:		Turnaround Time: (check)											
Relinquished By:				Date/Time:		Received By:				Date/Time:		same day _____ 72 hours _____ 24 hours _____ 5 days _____ 48 hours _____ normal <input checked="" type="checkbox"/>											
Relinquished By:				Date/Time:		Received in Lab By: <i>[Signature]</i>				Date/Time: 4/14/95 2:50 PM		Sample Integrity: (check)											
Relinquished By:				Date/Time:		Received in Lab By:				Date/Time:		intact <input checked="" type="checkbox"/> on ice <input checked="" type="checkbox"/>											

Note: Samples will be disposed of after 30 days.



GEOTECHNICAL GROUP, INC.

Soil Engineering ▲ Geology ▲ Environmental

PHASE I ENVIRONMENTAL SITE ASSESSMENT
NATIONAL RV, INC.
3411 NORTH PERRIS BOULEVARD AND
100 WEST SINCLAIR STREET
PERRIS, CALIFORNIA

PROJECT NO. 11220A.2
OCTOBER 15, 2006

Prepared For:

National RV, Inc.
100 Sinclair Street
Perris, California 92570

Attention: Mr. Jon Corn

October 15, 2006

National RV, Inc.
100 Sinclair Street
Perris, California, 92570

Project No. 11220A.2

Attention: Mr. Jon Corn

Subject: Phase I Environmental Site Assessment, National RV, Inc. 3411 North
Perris Boulevard and 100 West Sinclair Street, Perris, California

Attached herewith is the Phase I Environmental Site Assessment (ESA) conducted by this firm for the National RV, Inc. facility, located at 3411 North Perris Boulevard and 100 West Sinclair Street, Perris, California.

This Phase I ESA was planned and executed based upon a scope of services generally outlined in our Work Authorization Agreement dated September 6, 2006.

We appreciate the opportunity to provide this Phase I ESA for the subject property. If you have any questions or comments regarding this report, please do not hesitate to contact this firm at your convenience.

LOR Geotechnical Group, Inc.

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EXECUTIVE SUMMARY

This firm conducted a Phase I ESA for the National RV, Inc. facility located at 3411 N. Perris Boulevard and 100 W. Sinclair Street, Perris, California. This Phase I ESA was performed in general accordance with ASTM E 1527-05 and All Appropriate Inquiries set forth in 40 CFR Part 312.

The subject site is located on both the west and east side of Perris Boulevard. Site usage at both locations was vacant/agricultural land prior to the development of recreational vehicle (RV) manufacturing facilities in 1985 at 3411 N. Perris Boulevard and 2000 at 100 W. Sinclair Street. Weekend Warrior, a trailer manufacturer, occupies the north portion of Building 4 at the 100 W. Sinclair Street facility. Hazardous materials are used at the site in the RV and trailer manufacturing process. Hazardous materials at the site include: propane, thinners, anti-freeze transmission fluid, motor oil, gear oil, resins, paint, undercoating, gasoline, diesel, peroxides, methyl ethyl ketone (MEK), glues/adhesives, aliphatic dibasic acid esters, diphenylmethane-diisocyanite, acetone, and oxygen, acetylene, and argon/carbon dioxide mix gases. The facility is registered with the County of Riverside, Department of Environmental Health as a hazardous waste generator, hazardous material handler, and underground storage tank operator. Other agencies that permit the facility for their manufacturing processes are the South Coast Air Quality Management District and Regional Water Quality Control Board. The 3411 N. Perris Boulevard facility has an 8,000-gallon gasoline underground storage tank, three in-ground hydraulic lifts, and 250- and 500-gallon diesel aboveground storage tanks.

There are no properties listed with the regulatory agencies within a one-mile radius which might pose an adverse environmental impact to the subject site.

Based on the results of this Phase I ESA, the subject site does not appear to have any recognized environmental conditions (RECs) indicative of releases or threatened releases of hazardous substances on, at, in, or to the subject site. However, potential REC's include the 8,000-gallon UST and poor housekeeping practices at the Weekend Warrior facility. The UST at the 3411 N. Perris Boulevard site is a double-walled fiberglass UST with upgraded double-walled piping. The UST and piping are placed in a gravel backfill, have current permits with the CRDEH, electronic leak detection system, and no reported unauthorized releases, however, these do not preclude the

National RV, Inc.
October 15, 2006

Project No. 11220A.2

possibility that a release of gasoline has occurred at the site. Poor housekeeping at the Weekend Warrior facility includes improper storage, and no secondary containment for the hazardous materials and paint spills.

At a minimum, we would recommend regulatory requirements for the UST permitting, which includes tank and line tightness tests, continue to be performed on the UST system and the housekeeping practices at Weekend Warrior be improved.

INTRODUCTION

During September and October of 2006, a Phase I Environmental Site Assessment (ESA) was conducted by this firm for the National RV, Inc. facility located at 3411 N. Perris Boulevard and 100 W. Sinclair Street, Perris, California. This Phase I ESA was conducted for National RV, Inc. and their designates in general accordance with the Standard Practice for Environmental Site Assessments, ASTM E 1527-05 and All Appropriate Inquiries set forth in 40 CFR Part 312. The purpose of this Phase I ESA was to identify recognized environmental conditions associated with the subject site. A recognized environmental condition is defined as the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum products into structures on the property or into the ground, groundwater, or surface water of the property. This does not include *de minimis* conditions, that generally, do not present a threat to human health or the environment and generally would not be the subject of an enforcement action if brought to the attention of the appropriate government agency.

The approximate location of the site, within its regional settings, is presented on the enclosed Index Map, Enclosure A-1, within Appendix A.

The scope of this assessment included: 1) A general reconnaissance of the subject site and immediate vicinity; 2) A compilation, review and interpretation of published reports and data available from various private, public and regulatory agencies; 3) A review of historical aerial photographs, topographic maps, and city directory information; 4) Interview with personnel familiar with the operations at the subject site; and 5) Preparation of this report.

The findings of our Phase I ESA, as well as our conclusions and recommendations, are presented in the following sections of this report.

NON-SCOPE CONSIDERATIONS

The following environmental issues are outside the scope of ASTM E 1527-05 and 40 CFR Part 312, and were not specifically addressed in this report:

- Lead in Drinking Water
- Lead-Based Paint
- Wetlands
- Asbestos-containing materials
- Methane
- Cultural Land Historical Resources
- Industrial Hygiene
- Health and Safety
- Ecological Resources
- Endangered Species
- Indoor Air Quality
- Mold and Mildew
- Mineral Resources
- Regulatory Compliance
- Natural Hazards
- Radon
- High Voltage Power Lines

METHODOLOGY AND PROCEDURES

During our research for this Phase I Environmental Site Assessment, various public agencies and individuals were contacted in order to provide insight into the previous and current uses of the site areas with respect to environmental impairments. The Santa Ana Regional Water Quality Control Board, County of Riverside Department of Environmental Health, South Coast Air Quality Management District, and City of Peris Building Department were contacted for information regarding permits for the site, underground storage tanks, hazardous materials incidents, and general information

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about the subject site to ascertain the past uses with respect to environmental concerns.

Federal and state lists and databases were reviewed to ascertain the presence of known environmentally impaired sites within the immediate area of the property and to determine their impact, if any, to the subject site.

Aerial photographs, on file at the Riverside County Flood Control and Water Conservation District, were examined at various time intervals from 1948 through 2005 to investigate the past use of the subject site and the surrounding region. Environmental Data Resources, Inc. (EDR) provided electronic copies of historic aerial photographs from 1933 through 2002 for inclusion in this Phase I ESA Report, as a historical reference and as supplemental information.

Along with our public and governmental agency interviews and literature research, a site reconnaissance of the property was conducted. The site reconnaissance was conducted in order to determine current uses of the site and the potential for soil and/or possible groundwater contamination based on aboveground visual observation.

REVIEW OF EXISTING REPORTS

The following reports were reviewed as part of this Phase I Environmental Site Assessment.

Eder Associates Consulting Engineers, Environmental Audit Report, Dated 1988

The environmental audit report was conducted for Mayer, Brown & Platt, of New York, NY, for the 3411 N. Perris Boulevard facility. The scope of this audit consisted of a site visit and tenant interview. No date was evident on the report, however the site visit was conducted on December 5, 1988. The audit stated there were no "immediately pressing environmental problems", but did include several recommendations for environmental improvements at the site. These recommendations pertained to; proper labeling of chemical containing drums; sampling of the septic systems to verify that no hazardous wastes were being discharged into this system; submittal notifications pursuant to the SARA Title III Emergency Planning and Community Right-to-Know Act, if necessary; registration of the underground fuel tank through the Riverside County Health Department; construction of spill containment provisions around hazardous material storage areas; and confirmation from the

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SCAQMD that permits are not needed for the exhaust from the wood shop and fiberglass finishing area exhausts.

LOR Geotechnical Group, Inc., Phase I Environmental Site Assessment, National RV, Inc., Perris, California, Dated February 2, 1994 (1995), Project Number 10533.2

The Phase I ESA was conducted for Union Bank, using their criteria for Phase I reports. The report dated 1994 was actually done in 1995, and was conducted for the 3411 N. Perris Boulevard facility. The report concluded no adverse environmental conditions associated with the site except for the following: the small spills of hazardous material and the lack of containment systems in the multiple work areas provided a moderate likelihood of contamination of the underlying soils; over spray from the undercoating provided a moderate likelihood of contamination of the underlying soils in this area, and the presence of the 8,000-gallon UST had a low likelihood of contaminating the underlying soils from spills during filling and tank leakage.

LOR Geotechnical Group, Inc. Subsurface Soil Sampling and Testing, National RV, Inc., 3411 North Perris Boulevard, Perris California, Dated April 28, 1995, Project Number 20533.22.

Based on the results of the Phase I ESA report Union Bank requested subsurface sampling and testing be conducted at the underground storage tank (UST); an area of undercoating over spray; and small spill areas at various locations from resins, petroleum products, and other fluids used at the facility. Borings were placed around the underground storage tank, the waste storage area, the undercoating over spray area, and within the plant at the previous storage area of transmission and hydraulic fluid. The concrete slab-on-grade or asphalt concrete was cored and borings were hand augured down to a maximum depth of 10 feet.

Samples taken at 10 feet placed at the UST, were analyzed for the presence of Volatile Fuel Hydrocarbons in accordance with Environmental Protection Agency (EPA) Method 8015 modified for gasoline and benzene, toluene, ethylbenzene, and total xylenes (BTEX) EPA method 8020. Soil samples obtained at the 5-foot depth within the other three borings were analyzed for halogenated and aromatic volatile organic compounds using EPA Method 8020. Laboratory test results indicated non-detect for the compounds analyzed and the report concluded that no subsurface soil contamination is present at the locations bored at the site. It further stated that "the

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areas of spillage noted during the Phase I Investigation do not appear to have resulted in significant amounts of the spilled materials migrating into the subsoil. Management practices which immediately pickup any spilled materials appear to have been effective in the past and should be continued."

LOR Geotechnical Group, Inc., Phase I Environmental Site Assessment, Proposed National RV Expansion, Perris, California, Dated June 30, 1999, Project Number 11220.2.

This Phase I ESA report was conducted for the proposed expansion of the facility onto the 100 W. Sinclair Street property. At the time of the Phase I ESA the property was vacant agricultural land (AG Sod). The report concluded there was no evidence of adverse environmental conditions associated with the site.

LOR Geotechnical Group, Inc., Preliminary Geotechnical Investigation, proposed National R.V., Inc. Expansion, 20 acres Southwest of Morgan Street and Perris Boulevard, Perris, California, Dated July 6, 1999, Project Number 11220.1.

The Preliminary Geotechnical Report documented the placement of six exploratory borings over the 100 W. Sinclair Street site to a maximum depth of 50 feet below the ground surface. Although done specifically to evaluate the soil engineering properties of the site soils for new building construction, the borings did not reveal any unusual odors or discolorations. No subsurface features or obstructions were encountered. No bedrock or groundwater was encountered to the borings maximum depth of 50 feet.

GEOLOGIC AND HYDROLOGIC SETTING

The site is situated within the southwestern portion of the Perris structural block, which lies in the larger Peninsular Ranges Geomorphic Province of Southern California. The site is underlain by geologically-recent deposits of alluvium and crystalline bedrock at depths. The depth to bedrock at the site is not known, but a water well located approximately 3,800 feet south of the site was drilled to a depth of 800 feet and bedrock was not encountered.

Groundwater Hydrology

Information provided by Eastern Municipal Water District (EMWD), which supplies water to the site, indicates the site is underlain by the Perris Valley aquifer which lies at an approximate depth of 120 feet below the ground surface and flows to the south and southeast. The nearest well lies just southwest of the 100 W. Sinclair Street facility. This well, called the AG Sod Aqueduct Well, was last measured in February of 2005 and groundwater was at a depth of 112 feet deep. Based on this data, groundwater at the site is expected to be approximately 100 feet deep and flowing in a southerly direction.

HISTORY OF SITE USAGE

To obtain a history of previous site usage, this firm conducted a search for aerial photographs of the area on file at the Riverside County Flood Control and Water Conservation District. The City of Perris Building Department was contacted for information regarding permit history for the construction of the site improvements. EDR was contacted for city directory information, Sanborn Fire Insurance Map coverage, and historical topographic maps. Personnel, knowledgeable about site operations, were interviewed to obtain any historical information and knowledge of any environmental concerns.

Aerial Photograph Review

A search was conducted for available stereo pairs of aerial photographs of the area on file at the Riverside County Flood Control and Water Conservation District (RCFCWCD) collection by a representative from this firm. The search provided aerial photographs taken of the subject site and surrounding area in 1948, 1962, 1974, 1980, 1984, 1985, 1990, 1995, 2000, and 2005, the latest photographs available. We also looked at the aerial photographs provided by EDR from 1938, 1953, 1967, 1980, 1989, 1994, and 2002, which are provided in this Phase I ESA Report for historical reference. Copies of the electronic aerial photographs provided by EDR are presented within Appendix B with the approximate site boundaries and scale shown.

The aerial photographs reviewed at the RCFCWCD consisted of vertical aerial stereographic photograph pairs of varying scales as available on file. These photographs were viewed using stereoscopes with magnifications of 2X and 4X for

three-dimensional enhancement. Due to the relatively large photographic scales involved, the analysis and subsequent interpretation of detail from aerial photographs sometimes required a degree of subjective judgement. The degree of certainty for the interpretation of details depends upon such factors as the scale and the quality of the photograph. However, an analysis of aerial photographs will reveal the general site history as to the relative use of the land, possible ground disturbance, activities, etc.

A summary of the site and surrounding conditions during the various times, as reflected in the photographs, is given below:

1. January 1, 1948, Photo Nos. 15-16, Scale 1" = 2,625'

These early photographs reveal that during this time, the two properties were being utilized to grow low lying row crops, with the far southern portions of each containing perhaps wheat or grain. No structures were visible on either the eastern or western properties. A drainage course traverses the easterly parcel from the southeast corner to the northwest corner and what is likely local, dense, native plants exists along this drainage in the southeastern corner. There is a well, pumphouse, and small reservoir adjacent to the western parcel on the southwest corner in the small rectangular cut-out. Along the southern boundary of the parcels is a linear depression of disturbed ground, clearly marking the location of the buried Colorado River Aqueduct and one or two small structures that are likely associated with the aqueduct are located adjacent to the site of the eastern parcel. The nearest other structures are located on the southwest corner of Perris Boulevard and Morgan Street. Here there are several buildings which may be a house, large barn, and several out-buildings and sheds. The surrounding area has similar agricultural use at the site. March Air Force Base is visible approximately 2 to 3 miles northwest of the site.

2. January 28, 1962, Photo Nos. 1 82 & 1 83, Scale 1" = 2,000'

The site and immediate surrounding region appear as described in the previous photographs, with the exception that the small reservoir just southwest of the western parcel appears dry. Also, the drainage course that traversed the eastern parcel appears to have been abandoned and the drainage redirected along the southern and/or eastern sides of this property.

3. May 24, 1974, Photo Nos. 380-381, Scale 1" = 2,000'

The site and immediate surrounding region generally appear as described in the previous photographs. Within the southeastern portion of the easterly parcel, a patch of native vegetation appears to have been re-established. What is likely a well located on this parcel and just north of the approximate midpoint for the southern boundary is discernible in these photographs.

4. April 10, 1980, Photo Nos. 398-399, Scale 1" = 1,600'

The site and immediate surrounding region appear much as described in the previous photographs.

5. February 4, 1984, Photo Nos. 1290-1291, Scale 1" = 2,000'

The site and immediate surrounding region appear as described in the previous photographs, with the exception that the small reservoir has been filled in and the agricultural rows are missing on the site. This may indicate a switch in agricultural use to non-row crops such as wheat or grain.

6. August 27, 1985, Photo Nos. 98-99, Scale 1" = 2,000'

The site and immediate surrounding region appear as described in the previous photographs. The National RV trailer/motor home facility is under construction east of Perris Boulevard. The facility just north of the western parcel appears to be growing areas of sod. However, the western parcel appears to still contain wheat-type crops. East of the National RV facility that is under construction, the former farmland appears to be returning to natural conditions.

7. January 21, 1990, Photo Nos. 8-25, 26, Scale 1" = 1,600'

Based on the dark coloring of the western parcel, the agricultural use there appears to have switched to sod (grass) cultivation. The National RV site is now in full production within the eastern parcel and a manufacturing facility is in operation within the adjacent property to the north.

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8. January 30, 1995, Photo Nos. 8-23, -24, Scale 1" = 1,600'

The site and immediate surrounding region appear as described in the previous photographs, except that the row pattern for sod production within the western parcel has shifted from north-south to east-west.

9. March 11, 2000, Photo Nos. 8-26, -27, Scale 1" = 1,600'

Several new structures, including a large (steel?) Building in the southwestern portion, have been added to the site east of Perris Boulevard. Truck trailers and RVs are being stored within the eastern portion of this parcel and storage area for the adjacent parcel to the north has expanded to the east as well. The western parcel is in the process of being graded for construction of the newer portion of the National RV trailer/motor home facility.

10. April 14, 2005, Photo Nos. 8-22 & 8-23, Scale 1" = 2,000'

The western parcel of the National RV trailer/motor home facility has been constructed and includes two large buildings and paved parking/storage/access areas. A vacant field separates the new development from Perris Boulevard. Areas surrounding the site appear much as described in the previous photographs.

City Building Department Records Review

We visited the City of Perris Building Department to request a search of building permit records that may be on file for the subject site. Numerous building permit records were on file, including those for the original construction and subsequent additions, remodels, and tenant improvements. The permits on file for the 100 W. Sinclair Street and 3411 N. Perris Boulevard facility are tabulated below.

100 W. SINCLAIR STREET	
DATE	PERMIT ACTIVITY
1/25/00	200 Amp Temporary Power
3/16/00	New Manufacturing Building (184,840 S.F.)
3/16/00	New Service Building (47,075 S.F.)

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100 W. SINCLAIR STREET	
DATE	PERMIT ACTIVITY
3/21/00	Knox Boxes
3/27/00	Block Wall (3' X 80')
5/30/00	Fire Alarm System/Water Monitoring
8/16/00	Overhead Crane System
8/18/00	Main Fire Sprinkler
8/21/00	Two Paint Spray Booths
8/29/00	Canopy
10/11/00	Fire Sprinklers to Two Spray Booths
12/12/00	Electrical to Traffic Signal
12/18/00	Temporary Certificate of Occupancy
1/8/02	Gas Line to Spray Booths
1/31/02	Four Spray Booths with Suppression System
2/21/02	Canopy (34' X 15')
2/25/02	Drainage Channel (pl) with concrete walls
4/11/02	Screen Wall
6/7/02	Canopy and Slab with Drainage
8/27/02	Two spray booths with halon system
7/3/06	Certificate of Occupancy for Rag'n, Inc.

3411 N. PERRIS BOULEVARD	
DATE	PERMIT ACTIVITY
1/24/85	Preliminary Geotechnical Investigation Report by California GeoTek (5 trenches to 15 feet, no GW, no bedrock)
3/7/85	Grading Plans by J.F. Davidson
5/14/85	Grading Permit for APN 303-120-05 and -06
6/12/85	Compaction Report, 3 buildings and parking lot by California GeoTek

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3411 N. PERRIS BOULEVARD	
DATE	PERMIT ACTIVITY
6/17/85	Fencing, irrigation and electrical conduit
8/5/85	Temporary power pole
9/26/85	Proposed 154,200 S.F. production assembly building
11/22/85	3 septic systems
11/27/85	Dust collection system, Building No. 1
12/23/85	Certificate of Occupancy for Building Nos. 1 and 3
2/13/86	16' X 56" fiberglass spray booth
2/18/86	Partition walls in Building No. 1
7/19/86	Two manufacturing buildings (40' X 90' and 138' X 90') and 1 canopy (35' X 90')
1/9/87	Relocation of septic tank and two pits on Building No. 3
1/9/87	Remodel and addition for Building No. 3
3/4/87	Electrical for Building No. 3
4/6/87	3 partition walls and one 8' X 20' room (Building No. 3)
7/7/87	2 exhaust systems and spray booths in Building No. 3
1/16/92	41' X 36' awning
4/1/92	5,445 S.F., 8,000 S.F., 4,640 S.F. Canopies
3/12/94	Staff report, add 3 open canopies totalling 28,880 S.F. and enclosed an additional 4,400 S.F. for Building No. 1, and two open canopies for Building No. 3 totaling 13,240 S.F.
8/10/94	4,400 S.F. canopy and 7,400 S.F. canopy
8/30/94	Hopper/Cyclone Equipment
3/20/95	Staff report to improve easterly 10 acres with parking and storage and construct storage building.
7/24/95	Modular office with tie-downs
9/26/95	Lights under new canopy #3
10/26/95	Parking lot lights

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3411 N. PERRIS BOULEVARD	
DATE	PERMIT ACTIVITY
12/19/95	Addition to Building No. 3, canopy #7, canopy #8, and #9 (14,342 S.F.), canopy #10 (7,760 S.F.)
1/22/96	Grading two guard sheds
2/20/96	Electrical for four canopies and one enclosure
4/5/96	Compaction Report for Building Pad (Building No. 2)
6/11/96	56' X 20' canopy
11/21/96	T.I.s 825 S.F. additional tool storage and bathroom
12/18/96	478 linear feet (LF) of 8' high walls and 167' of 12' high walls and #17 blower and #45 exhaust dust collector and TIs office and HVAC.
12/19/96	Certificate of Occupancy Manufacturing/Storage/Office/Repair bays (Building No. 2)
1/21/97	5 overhead cranes (3, 1/2-ton and 2, 1-ton) in Building No. 2
3/12/97	Pallet Racks and Shelving
5/6/97	Install monument and sign
7/17/97	T.I.s 4 offices, 2 lunchrooms, and 1 storage area
2/19/98	UST upgrade (electrical)
3/17/98	T.I.s for bathroom
4/2/98	Fire sprinkler lines to canopies
4/9/98	Stand alone steel building (4,025 S.F.) and canopy #16
4/28/98	Electrical upgrade for lights to canopies #13 and #14
4/30/98	2 overhead cranes (1-ton and 1.5-ton)
5/12/98	Electrical circuit for 7.5 H.P. service pack
5/13/98	Fire line, hydrant, and relocate existing hydrant
5/27/98	Fire sprinklers for office and bathroom
6/2/98	In-ground hydraulic lift
6/17/98	Fire sprinkler, canopy #18, and Storage racks
7/15/98	Fire protection for canopies #16 and #17

3411 N. PERRIS BOULEVARD	
DATE	PERMIT ACTIVITY
12/16/98	Overhead crane
??/98	Canopy #17 (5,000 S.F.)
2/25/99	Upgrade conduit for electrical disconnection box
3/24/99	Office remodel
8/16/99	Sign changes
11/18/99	Oxidizer tower
11/23/99	Gas line and 7 heaters
3/13/00	Upgrade fire alarm
12/28/00	Electrical to 3 scrubber motors

City Directory Information

The oldest site address, 3411 N. Perris Boulevard was chosen for the search of city directory information. This address is only listed in 2000 and 2005 under "National RV Parts and Service". The other facility address of 100 Sinclair Street, was not listed. Listings for nearby properties were only available for the year 2005 and were, Lakeside Transmissions and Perris Industrial & Truck (3515 Perris Boulevard), Freedom Community Christian Church (3519 Perris Boulevard), and a residence at 3532 Perris Boulevard. The EDR - City Directory *Abstract* is provided within Appendix C.

Sanborn Fire Insurance Maps

No coverage of Sanborn Fire Insurance Maps was available for the subject site. The Sanborn® Map Report from EDR is included within Appendix D.

USGS Topographic Maps

USGS topographic maps provided by EDR from 1901, 1943, 1953, 1967, and 1973 were reviewed. The subject site is shown as vacant land immediately surrounded by vacant land in all of the maps provided. Copies of the USGS topographic maps from EDR are provided within Appendix E.

Personnel Interview

We were provided a tour of the facility by Mr. Brent Vollmer, who has been in various positions at the company for many years, and currently heads the maintenance department. He provided an overview of the facility operations prior to our tour. In general, the chassis are received at the gantry east of Building 2 and stored in the unpaved portion of the site farther east. The chassis are taken to the south side of Building 3 where the metal sub-floor is fabricated and placed on the chassis. Under the south awning of Building 1, the wood sub-floor, flooring, and some electrical is added. In Building 2, the main assembly takes place as the cabinets, plumbing, electrical, sidewalls, caps, and roof are installed. Building 3 is where the caps are made.

At the Sinclair facility, the motor homes are painted in Building 5 and servicing of motor homes takes place in Building 4. Building 5 is shared with Weekend Warrior who bought the "Rag 'n" toy hauler trailer business that National RV used to own. Weekend Warrior moved the Rag'n trailer business to their Riverside facility but ran out of room, and currently leases space in Building 5 from National RV to manufacture their toy hauler trailers.

According to Mr. Vollmer, hazardous materials used and generated by National RV at the facility are all strictly controlled and oversight by the governing regulatory agencies is frequent. Any violations noted during inspections are immediately addressed.

SITE RECONNAISSANCE

A site reconnaissance was conducted on September 21, 2006, by Mr. M. Kevin Osmun of this firm. To orient our site reconnaissance, Assessor's Parcel Maps, a color aerial photograph, and copies of the site plans for each of the facilities, provided by Mr. Brent Vollmer, were used. These maps, aerial photograph, and plans are presented within Appendix A.

The National RV facility consists of four parcels, totaling approximately 50 acres. Three parcels, totaling approximately 30 acres are located on the east side of Perris Boulevard and are addressed 3411 N. Perris Boulevard. This portion of the facility contains three main buildings (Buildings 1-3) on approximately 20 acres and an approximate 10-acre unpaved storage area. The 3411 facility is bordered by commercial/industrial property (Business Park) to the northwest, vacant land to the

northeast, east, and south. South of the site is Sinclair Street, a dirt road, and the California Aqueduct pipeline. West of the site is Perris Boulevard followed by vacant land and the 100 W. Sinclair Street portion of the National RV facility.

The 100 W. Sinclair Street portion of the National RV facility consists of one parcel totaling approximately 20 acres, located on the west side of Perris Boulevard, and north of Sinclair Street. Sinclair Street borders the site to the south and ends at the west property line of the national RV facility. Vacant/agricultural land surrounds the 100 W. Sinclair Street facility. The agricultural property is owned by AG Sod who has some equipment and irrigation-related materials stored on the north and south side of the National RV property. What appears to be two well pumps, one may be non-operational, are located on the AG Sod property immediately south of the southwest portion of the National RV property. An asphalt parking lot covers the east portion of the site. The parking lot contains a depressed area in the east-center portion that allows storm water to pond prior to its release to an approximate 24-inch storm drain line. The storm drain line runs under Perris Boulevard into the drainage on the north side of the 3411 N. Perris Boulevard facility.

As the subject site is comprised of these two areas, on the east and west side of Perris Boulevard with different functions in each of the buildings, each building area is discussed separately below, for clarity and ease of discussion.

Building 1

Building 1 is located at 3411 N. Perris Boulevard and was constructed in 1985. Several awnings were added over the years on all but the west side of the building. The building houses offices on the west end with the remaining devoted to motor home manufacturing. Starting in the northwest corner of the building adjacent to the office area, is the R&D (Research and Development) area where new motor home design takes place. Associated with the R&D area is a spray booth for new mold construction. Office supplies are stored in the mezzanine area above the R&D offices. Additional offices are in a trailer present north of the R&D area in the asphalt parking lot/drive area. Continuing east along the north side of Building 1 is the vacuum mold area which uses ABS plastic sheets to mold parts. The molded parts are also ground and finished in this area. Excess plastic is ground up in a chipper for recycling. This recycled material is stored in cardboard boxes in a three-sided shed, north of this area near the north property line, on the asphalt drive. The next area to the east is the

carpet and upholstery area and a mill shop. The southeast portion of the building is where the wood floor, carpet, and linoleum is added to the chassis and also some electrical wiring is added. The carpeting is stapled not glued to the wood floor. Near the center of the building, just outside under the south awning is the 8,000-gallon gasoline underground storage tank (UST) and two diesel fuel aboveground storage tanks (ASTs). The diesel fuel ASTs are approximately 250- and 500-gallon tanks in secondary containment. Between these two ASTs is the gasoline dispenser. The gasoline UST is a double walled fiberglass tank installed in 1985. The UST and associated piping has been upgraded to meet current regulatory requirements and is fully permitted by the County of Riverside, Department of Environmental Health. A leak detection monitoring system is installed and the readout panel is inside Building 1, just north of the UST. At the time of our site visit the monitoring equipment for the UST appeared to be working properly.

Building 2

Building 2 is the main, motor home assembly building. Building 2 is located immediately south of Building 1 and was constructed in 1996. In the northeast portion of the building is the mill shop where the cabinets are made. From there the motor home moves west as wiring, plumbing, sidewalls, end caps, and the roof are added. The roof and sidewalls are manufactured (laminated) in the southeast portion of the building with storage located in the northwest portion. On the north side of Building 2 are the dust collectors for the mill shop. The compressor room, laundry, and solvent storage cabinet are also located on the north side of the building. The compressor room has two 5-gallon buckets to collect the oil from the compressor water. The solvent cabinet is a steel cabinet with 55-gallon drums of solvent on secondary containment, with dispensers.

East of Building 2 is the laminate storage area and gantry for unloading the new motor home chassis. Further east is the three-sided receiving building and concrete truck ramp. Two propane tanks for forklift use are located southeast and south of building 2. Hazardous materials in this area primarily consist of glues and solvents.

Building 3

Building 3 is the where cap manufacturing, chassis sub-floor fabrication, and rain test are conducted. The cap (front and end) manufacturing starts in the northwest portion of the building where the molds are gel-coated and fiberglass chop is added. All these procedures are conducted in spray booths. The caps are allowed to cure and are finished. Lights are added to the caps and they are transported to Building 2 for installation. In the south-center portion of the building is the sub-floor fabrication. The sub-floor is a steel shell welded to the chassis. The steel is painted black and two spray booths are located just west of this area for that purpose.

At the south end of the building are the rain test, alignment pit, and undercoating application areas. The rain test area has a concrete-lined sump that collects the water and allows the solids to settle. The water is run through filters and then reused. Waste water is allowed to run into a shallow concrete v-ditch that empties into the drainage v-ditch on the unpaved east portion of the site. The undercoating area has a disposable fabric material that is placed on the concrete to collect any undercoating drips. The alignment pit is a concrete pit for wheel alignments. At the east end of this area (southeast portion of the building) are two in-ground hydraulic lifts. According to Mr. Vollmer, one lift has not been used for years and has been cannibalized for parts for the operational one. East of Building 3 is a Munter thermal oxidation unit for the volatile organic compounds (VOCs) associated with the interior spray booths. East of building 3 is parts storage and the hazardous waste storage area. The hazardous waste storage area contains 5- to 55-gallon containers and is fenced and covered. The hazardous materials are on secondary containment. No visible signs of spills or leaks were noted. Farther to the east is the approximate 10 acre unpaved area.

Unpaved Area

The unpaved area is covered with gravel and is used for storage of molds, parts, and new chassis. Also in this area, east of Building 3, is the paint disposal area. Aerosol cans are punctured and the contents removed and then discarded. Caulk tubes are disposed of with the empty aerosol cans. Fifty-five gallon drums of waste paint are also stored in this area. Empty 55-gallon drums as well as metal, cardboard, and wood are present in roll-off containers for recycling. A concrete ribbon gutter traverses this unpaved area from the northwest to the southeast. The ribbon gutter transports water

from the drainage present on the north side of Buildings 1 and 3 and from the site to an unlined drainage ditch southeast of the property.

Building 4

Building 4 is located at the 100 W. Sinclair Street property and is the service building. Motor homes, owned by the public, are serviced in this building. Service required is typically body work, plumbing, electrical, etc., however some minor automotive work is conducted. Located in the northwest corner of the service area is a paint spray booth for any paint touch up work required. Located in the northeast corner of the building is a storage area for welders, gas cylinders, propane tanks, battery chargers, and soluble cutting oil. The east end of the building is for parts storage and shipping and receiving. In the shipping and receiving area is urethane packing foam in 55-gallon drums. The drums currently in use were in secondary containment. A small hazardous waste area is located on the east end of the building. Hazardous materials contained in this area consisted of waste paint, oil, alcohol, and urethane. A generator room is present on the north side of the building and contained 5-gallon buckets to collect oil from the systems "blow-by water". The generator room was clean with no indication of any spills.

Building 5

Building 5 is also located at 100 W. Sinclair Street. This building is shared by National RV and Weekend Warrior. National RV uses the southern approximate two-thirds of the building for their motor home painting operations, which include 6 paint booths. Weekend Warrior uses the remaining northern portion of the building for the manufacturing of "toy hauler" trailers.

National RV's use of Building 5 consists of touch-up work, taping, and final painting on the completed motor homes. Six paint spray booths are available for the painting. Offices and lunchroom are present in the east end of the building. Hazardous materials used in the touch-up work include gel-coat, blender, medium reducer, and polyurethane, present in small containers. South of Building 5 are four Munters units for spray booth VOC reduction. At the outside of the southeast corner of the building, under an awning, is the motor home wash area. This area has a clarifier for the wash water. This clarifier was being pumped out as part of the regularly scheduled maintenance of the clarifier during our site visit. Also present was another clarifier for

the new rain test area (not currently in use) located inside the southeast corner of Building 5. The water from these both clarifiers empties into the sewer. At the south-center portion of the building is where new hazardous materials are stored. The materials include 5 to 55 gallon drums of soap, tire dressing, water proofing, gear oil, and tacky coat compound. All of these materials are placed on secondary containment. East of this outside storage of new hazardous materials is the compressor room, which was clean and contained 5 gallon buckets to collect oil from the compressor "blow-by" water. Southeast of Building 5 is the hazardous waste storage area which includes a stockpile of soil for cleaning up spills, trash (cardboard) compactors, and the hazardous waste materials. North of the hazardous waste area is outside storage of parts (awnings) and some containers on a gravel portion of the site.

A chain-link fence separates the National RV and Weekend Warrior portion of Building 5, both inside and outside, on the west side of the site. Weekend Warrior operations start at the northeast portion of Building 5. Under the awning area the trailer frames are cut, welded, and placed on the chassis. The chassis has electrical harness and gas tanks added to the frame. They have some touch-up painting done and the floor is added. Touch-up painting includes spray painting. At the northwest corner of the building were 55-gallon drums of black paint, both full and partially full. The drums being used had a tray to collect any spills during filling of the smaller containers for the touch-up work. No secondary containment was present for the 55-gallon drums of paint. Located to the south of this area are 20-foot roll-off containers with parts for the trailer interiors. This is followed by the hazardous materials storage which is adjacent to the chain link fence that separates National RV from Weekend Warrior. Hazardous materials used by Weekend Warrior include, paint, denatured alcohol, anti-freeze, and laquer thinner. The denatured alcohol and laquer thinner were present in a metal cage with no secondary containment. Adjacent were the 55-gallon drums of anti-freeze for the trailer water systems and all purpose de-greaser, none on secondary containment. Inside is the mill shop and the final trailer assembly. Outside on the west portion of the site was material storage (tires, etc.) and new trailers.

Hazardous materials used at the site include: propane, thinners, anti-freeze transmission fluid, motor oil, gear oil, resins, undercoating, gasoline, diesel, peroxides, methyl ethyl ketone (MEK), glues/adhesives, aliphatic dibasic acid esters, diphenylmethane-diisocyanite, acetone, oxygen, acetylene, and argon/carbon dioxide mix gases.

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Color photographs of the subject site and adjacent properties are presented within Appendix A.

REGULATORY AGENCY RECORDS REVIEW

For records relating to environmental compliance and hazardous materials/waste within the County of Riverside, the County of Riverside Department of Environmental Health (CRDEH) generally is the lead agency. The Santa Ana Regional Water Quality Control Board (SARWQCB), or CRDEH may be the lead agency for soil and groundwater investigations and remediation. The South Coast Air Quality Management District oversees the permitting and enforcement of air quality operations.

Riverside County Department of Environmental Health

The CRDEH was contacted for information regarding any environmental records they might have for the subject site. The CRDEH found records for the site under both site addresses. The files were for hazardous materials handling, hazardous waste generation and the UST at the facility. The site has been permitted for the UST since 1987, as a hazardous waste generator since 1989, and for their hazardous materials handling since 1990. Periodic inspection reports by the CRDEH indicated various violations have taken place over the years at both the facilities. The violations were so repeated that an enforcement action was brought against National RV in 2002.

A table of the pertinent records reviewed at the CRDEH is presented below with copies of these records provided within Appendix F.

CRDEH RECORDS REVIEW 3411 N. PERRIS AND 100W. SINCLAIR	
DATE	RECORD
4/3/06	Haz Mat Handler Inspection Report - Violations noted were contact information out of date, labeling, recycling of non-labeled containers, NEPA signs need posting on all entrances, post signs indicating what materials are stored, open containers of hazardous materials and waste.
4/3/06	Hazardous Generator Inspection Report - violations noted were: hazardous waste containers are to be stored closed/sealed, some hazardous waste manifests did not have Treatment, Storage, Disposal Facility (TDSF) copy attached.

CRDEH RECORDS REVIEW 3411 N. PERRIS AND 100W. SINCLAIR	
DATE	RECORD
3/22/05	Supplemental Report – Attempt to inspect facility prior to administrative enforcement order hearing, no one available to walk facility with the inspector, considered refusal for inspection.
4/21/05	Hazardous Waste Generator Report – violations noted were: hazardous waste containers not closed when not in use and not maintained to prevent spills, improper labeling, TDSF signed copies not found for 3 waste manifests, need to provide analytical data for paint booth filters, used oil from oil filter crusher not properly maintained.
4/25/05	Supplemental Report – Hazardous waste manifests have been updated.
4/26/05	Business Emergency Plan (BEP) Inspection Report – Violations noted were: minimize possibility of a release, see 4/21/06 generator report, keep work space in fiberglass area cleared for easy access and exit.
11/14/05	Gasoline UST Monitoring System Certification – Passed (no line leak detectors installed)
11/18/05	Hazardous Materials Handler, Hazardous Waste Generator and UST Permit – Expires 11/28/06. (permits were on file as a hazardous waste generator since 1989, for a hazardous material handler since 1990 and for UST since 1987).
11/15/04	UST Inspection Report – Violations noted were: spill bucket separating from base plate which needs to be repaired to prevent leaking into fill sump.
11/15/04 & 11/17/04	Hazardous Waste Generation Inspection Report – Violations noted were: hazardous waste not stored to minimize possibility of spill, accumulation time, labeling, no weekly inspections, containers not closed, storage of incompatible wastes, etc.
11/15/04 & 11/17/04	Hazardous Materials Handler Inspection Report – Violations noted were: need to provide disposal information to CRDEH regarding the temporary gas tank disposal, employee training is inadequate, labeling of hazardous materials and waste, stored chemicals not rain protected, fine resin waste being discharged to the drainage channel, hydraulic fluid from repair work on ground next to ribbon cutter.
11/23/04	UST Secondary Containment Testing Report and Monitoring System Certification – Passed
11/27/04	Designation of Pacific Systems Electronic as the UST operator.
4/15/03	UST Inspection Report – Violations noted were: visual and audible alarm not working, sensors not placed at lowest point.
8/5/03	UST Plan Check Application for installation of dispenser containment, double walled piping and electronic in-line leak detector.

CRDEH RECORDS REVIEW 3411 N. PERRIS AND 100W. SINCLAIR	
DATE	RECORD
10/30/03	CRDEH photos and typed report of upgrades to dispenser and piping.
10/31/03	Fax from HCI Environmental to CRDEH with UST upgrade permit, installer certification and secondary containment testing report, dated 10/18/03, testing passed.
4/21/03	Request for Environmental Action for failure to monitor and operate a UST, sensors raised, possible tampering, historic violations of similar nature.
4/23/03	Supplemental Report – Audible and visual alarms for UST not working.
4/29/03	Supplemental Report – Audible and visual alarms for UST are now working.
3/28/02	Unified Program Consolidated Form, Business Activities, Facility Information, lists hazardous materials used at the facility. The list included propane, thinner, anti-freeze, transmission fluid, motor oil, gear oil, solvent blend thinner, polyester resin, water-based asphaltic undercoating, unleaded gasoline, styrene monomer resins, methyl ethyl ketone (MEK), peroxide, methylene chloride adhesive, asphaltic dibasic acid esters, diphenylmethane-diisocyanate, diesel fuel, oxygen, acetylene, argon/carbon dioxide mixture, urethane (adhesive), and acetone.
5/22/02	BEP Inspection Report – violations noted were: no information reviewed on temporary fuel tank disposal, lack of training regarding hazardous waste disposal, no TSDF copy with waste manifest (1 manifest), improper labeling, incompatible waste storage, emergency information and equipment labeling required, lack of overall employee training, chemicals stored on areas not protected by rain, fine resin discharge to drainage channel, hydraulic oil spilled next to ribbon gutter.
5/22/02	Hazardous Waste Generator Inspection Report – Violations noted were: accumulation time of hazardous waste, improper labeling, no weekly inspection, containers not closed/sealed, training documentation not maintained, batteries not properly maintained, hazardous waste not inspected daily and not operated to minimize the possibility of fire, explosion or release.
6/3/02	Enforcement Panel Referral for above noted violations.
7/29/02	Hazardous Waste Generator Inspection Report – no violations were noted.
7/29/02	BEP Inspection Report – no violations were noted.
3/14/01	BEP Inspection Report – violations noted were: NFPA signage needed, improper labeling of waste drums, drum storage needs secondary containment, need to ground the flammable containers, need to rotate MEKP so that storage does not exceed shelf life.
2/1/01	UST Leak Test and Monitor Certification – all passed.

CRDEH RECORDS REVIEW 3411 N. PERRIS AND 100W. SINCLAIR	
DATE	RECORD
3/14/01	Hazardous Waste Generator Report – violations noted were: improper labeling and hazardous waste source reduction requirements completed.
3/29/01	Joint Inspection of CRDEH and Perris Fire Department – Violations noted were: NFPA signage, protect the drainage from on-site activities, maintain drainage, improper storage of hazardous waste, control chemical storage to minimize potential releases, labeling of hazardous waste containers.
6/5/01	BEP Inspection Report – Violations noted were: battery storage rack, chemical storage in Department 21 needs containment, gas cylinder needs to be secured, label transmission tanks in building 3, NFPA signage, aluminum dust is flammable and needs to be handled correctly.
6/5/01	Hazardous Waste Generator Inspection Report – Violations noted were: SPCC plan needs to be completed.
11/21/01	UST Inspection Report – Violations noted were: no monthly or annual inventory reconciliation, no annual meter calibration, monitoring system needs yearly certification.
1/11/00	UST Line Test – Passed.
2/14/00	UST Tightness Test and Monitoring Certification – Passed
11/21/00	BEP and Hazardous Waste Generator Inspection Reports – Violations noted were: improper labeling, two hazardous waste containers not sealed, NFPA signage and post emergency evacuation maps.
3/27/98	UST Installation Inspection Report – no violations noted.
3/3/98	UST Installation Inspection Report – Violations noted were: not all exposed steel double wrapped.
3/4/98	UST Installation Inspection Report – all bare steel now in boots.
3/16/98	UST Phase II Vapor Recovery and Blockage Test Certification.
4/14/98	Hazardous Waste Generator and BEP Inspection Reports – Violations noted were: need to mail state blue copy of Hazardous Waste Manifests, containers need closed lids, gas cylinders need to be secured, need to post emergency equipment signs, NFPA signs and emergency evacuation plans.
4/14/98	UST Installation Inspection Report
10/28/98	UST Upgrade Certification issued.

CRDEH RECORDS REVIEW 3411 N. PERRIS AND 100W. SINCLAIR	
DATE	RECORD
4/26/95	Hazardous Waste Generator and UST Inspection Reports - Violations noted were: compressed gas cylinder not secured, improper labeling, workers not wearing protective gear, inventory reconciliation records not available and dispenser calibration.
4/19/93	Hazardous Waste Generator and BEP Inspection Reports - Violations noted were: drums not closed or labeled properly, keep containers out of aisle, need to provide for annual training, post evacuation plan.
4/19/93	UST Inspection Report - Violations noted were: meter calibration and daily monitoring.
6/24/92	Supplemental Report - UST inspection facility is acceptable for permitting.
10/22/92	Application for UST alternative monitoring.
8/14/91	Letter requesting California Form A and B and UST Tightness Tests, copies provided by National RV were attached. Tightness Test passed.
7/6/89	Application for UST alternative monitoring.
6/26/89	Initial UST Inspection by County Departments, required initial precision test and anular tank probe test with annual pipeline test thereafter to satisfy option # 5 of alternative monitoring.

Based on the records we reviewed, there was a pattern of continual violations at the facility until finally an environmental action was brought against National RV. It appears that since the environmental action, practices relating to hazardous materials at the facility have improved.

Regional Water Quality Control Board

The Regional Water Quality Control Board, Santa Ana Region (SARWQCB) was contacted for records they had on file pertaining to the site. A review of their records indicated they had records on file for the facility dating from 1985. Inspections conducted by the SARWQCB were related to the Waste Discharge Requirements (WDR) required for the on-site waste water disposal. All of the inspections of the on-site septic systems showed no violations. However, the WDR required monitoring of the septic system effluent for Chloride, Boron, and Total Dissolved Solids (TDS). Analytical results over the years indicated periods where concentrations of Chloride

and TDS exceeded the levels for discharge, however no enforcement action was ever initiated by the Board for exceeding these levels. These WDRs were rescinded in 1997 after the facility was placed on sewer and the septic systems abandoned. Currently, the Storm Water Pollution Plan (SWPP) in place for the facility requires sampling at 2 points in the drainage at the 3411 N. Perris Boulevard facility. Other records on file included a plumbing plan which showed the UST and the septic system layout, and County Health Department permit for the septic system. MSDSs (material safety data sheets) for the chemicals used at the site were also present in the file.

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) had permits on file for the 3411 Perris Boulevard facility starting in November of 1985, for the paint and solvent spray booths. In February, 1986 the UST was permitted. The last inspection report, dated June, 22, 2004, was a response to a claim by a former employee that the facility was not operating in accordance with its permits. The inspection noted no violations. The other inspection reports through the years noted no violations, except in 1987 and 1988 for failure to obtain permits to operate, documenting daily coating usage, and failure to obtain permit to open burn. At the 100 W. Sinclair facility, there were some minor violations noted during the SCAQMD yearly inspections, which were corrected. A copy of the pertinent SCAQMD records are provided within Appendix G.

ENVIRONMENTAL DATABASE REVIEW

LOR Geotechnical Group, Inc. contracted with EDR to provide an environmental database search for the subject site. The database search provides information regarding landfills, underground storage tanks, hazardous waste generators, etc., on the subject site and surrounding properties in accordance with ASTM Standards and All Appropriate Inquiries set forth in 40 CFR Part 312. Several mapped sites, including the subject site, were found in EDR's search of available government records within the respective search radii. A copy of the EDR database report, which provides a complete list of the federal, state, tribal, and proprietary records searched, is provided within Appendix H. A summary of the databases are tabulated below:

Database	Search Distance (miles)	Results
FEDERAL RECORDS		
NPL	1.0	None
Proposed NPL	1.0	None
Delisted NPL	1.0	None
NPL RECOVERY	TP	None
CERCLIS	0.5	None
CERC-NFRAP	0.5	None
CORRACTS	1.0	None
RCRA TSD	0.5	None
RCRA Large Quantity Generators	0.25	Subject and One Other Site, See Below
RCRA Small Quantity Generators	0.25	Subject Site, See Below
ERNS	TP	None
HMIRS	TP	None
US ENG CONTROLS	0.5	None
US INST CONTROL	0.5	None
DOD	1.0	None
FUDS	1.0	None
US BROWNFIELDS	0.5	None
CONSENT	1.0	None
ROD	1.0	None
UMTRA	0.5	None
ODI	0.5	None
TRIS	TP	None
TSCA	TP	None
FTTS	TP	None
SSTS	TP	None
ICIS	TP	Subject Site, See Below
PADS	TP	None

Database	Search Distance (miles)	Results
MLTS	TP	None
MINES	0.25	None
FINDS	TP	Subject Site, See Below
RAATS	TP	None
STATE RECORDS		
Hist Cal Sites	1.0	None
CA Bond Exp. Plan	1.0	None
SCH	0.25	None
Toxic Pits	1.0	None
State Landfill (SWF/LF)	0.5	None
CA WDS	TP	Subject Site, See Below
WMUDS/SWAT	0.5	None
Cortese	0.5	None
SWRCY	0.5	None
LUST	0.5	None
CA FID UST	0.25	Subject Site, See Below
SLIC	0.5	None
UST	0.25	Subject Site, See Below
HIST UST	0.25	Subject Site, See Below
AST	0.25	None
SWEEPS UST	0.25	Subject Site, See Below
CHMIRS	TP	None
Notify 65	1.0	None
DEED	0.5	None
VCP	0.5	None
DRYCLEANERS	0.25	None
WIP	0.25	None
CDE	TP	None

Database	Search Distance (miles)	Results
RESPONSE	1.0	None
HAZNET	TP	Subject Site, See Below
EMI	TP	Subject Site, See Below
ENVIROSTOR	1.0	None
TRIBAL RECORDS		
INDIAN RESERV	1.0	None
INDIAN LUST	0.5	None
INDIAN UST	0.25	None
EDR PROPRIETARY RECORDS		
Manufactured Gas Plants	1.0	None
EDR Historical Auto Stations	0.25	None
EDR Historical Cleaners	0.25	None

RCRA Large and Small Quantity Generators

Resource Conservation and Recovery Act (RCRA) large and small quantity generators include sites that generate between 100 and 1,000 kg (small) or over 1,000 kg (large) of hazardous waste per month. The facility at 100 W. Sinclair Street is listed as a small quantity generator and the facility at 3411 N. Perris Boulevard is listed as a large quantity generator. No treatment, storage, and disposal activities were reported at either facility. No violations were noted for the 100 W. Sinclair Street facility. However, one violation was noted for the 3411 N. Perris Boulevard facility. The exact nature of this violation was not provided but the data indicates it was for all requirements as a large quantity generator. National RV achieved compliance one month after the violation was brought to their attention. A copy of the EDR Facility Report for the 3411 N. Perris Boulevard site is also provided within Appendix H.

One other facility, Modtech Holdings, Inc., addressed 195 Morgan Street, located north of the 3411 N. Perris Boulevard facility, is also listed as a large quantity generator. The facility generates unspecified oil-containing waste and off specification, aged, or surplus organics. No violations or treatment, storage, and disposal activities

were reported. This facility is also listed with the SCAQMD for emissions and the RWQCB with Waste Discharge Requirements (WDRs).

ICIS

The EPA's Integrated Compliance Information System (ICIS) supports the national enforcement and compliance of the National Pollutant Discharge System (NPDES). This listing is associated with the enforcement action noted above under the Large Quantity Generator section.

FINDS

The Facility Index System (FINDS) database contains both facility information and pointers to other sources that contain more detail. EDR includes the following databases: Permit Compliance System (PCS), Aerometric Information Retrieval System (AIRS), Enforcement Docket (DOCKET) used to manage and track information on civil judicial enforcement cases for all environmental statutes, Federal Underground Injection Control (FURS), Criminal Docket System (C-DOCKET) used to track criminal enforcement actions for all environmental statutes, Federal Facilities Information System (FFIS), State Environmental Laws and Statutes (STATE), and PCB Activity Data System (PADS). The 3411 N. Perris Boulevard facility is listed in the FINDS database as a RCRA large quantity generator and the 100 W. Sinclair Street facility is listed in the FINDS database as a small quantity generator.

CA WDS

Both facilities are listed in the California Waste Discharge System (CA WDS) database as category C facilities. Category C facilities are those that have no waste treatment systems, and have WDRs through best management practices. This facility is required to sample the storm water runoff at specified sample points during periods of rain as part of their Storm Water Pollution Prevention Plan.

Cal FID UST/UST/Hist UST/Sweeps UST

The following underground storage tank databases; the California Facility Inventory Database (Cal FID UST), the Underground Storage Tank (UST), Historical UST, and the Statewide Environment Evaluation and Planning System (SWEEPS) UST databases had the facility at 3411 N. Perris Boulevard listed for the 8,000-gallon gasoline UST at the site.

HAZNET

This database is kept by the California EPA (Environmental Protection Agency), and includes facility and manifest data from the copies of hazardous waste manifests received each year by the DTSC (Department of Toxic Substances Control). The subject site is listed in this database for its generation and disposal of hazardous waste. The list of manifested wastes from the site included oxygenated solvents, unspecified organic liquid waste, other organic solid waste, and off specification, aged or surplus organics.

EMI

The Emissions Inventory Data (EMI) is a database of facilities that produce air emission pollutants. The listing provided data from 1987 through 2001 on emissions from the facility.

Orphan Summary

The orphan summary, which is a list of all sites whose location is not readily identified (mapped), and may be near the subject site, was reviewed. Our review of this list indicated there were no listed sites on or adjacent to the subject site.

Division of Oil, Gas, and Geothermal Resources

The California Division of Oil, Gas, and Geothermal Resources maintains a list of all producing and abandoned oil and gas wells within the State of California. We reviewed the Well Map W1-7 for the area, which revealed there are no abandoned or producing gas and/or oil wells were located within one mile of the subject site.

Geotracker

The California State Water Resources Control Board maintains an online database, Geotracker, for UST (Underground Storage Tank), LUST (Leaking Underground Storage Tank), and SLIC (Spills, Leaks, Investigations, and Cleanups) sites. The subject site and surrounding properties did not appear in the database as either an UST, LUST, or SLIC site.

EnviroMapper

The United States EPA maintains an online database, EnviroMapper, which includes water dischargers, Superfund sites, hazardous waste sites, toxic releases, air emissions, and Biennial Reporting System (BRS) sites, which include small and large quantity generators (hazardous waste) and treatment, storage, and disposal facilities for hazardous waste. The subject site appeared in this database as a RCRA large quantity generator and for its air emissions. None of the surrounding properties are listed in the EnviroMapper online database.

Database Summary

Based on the information provided by the public, regulatory, and governmental agencies and information obtained during our records search and literature review, there appear to be no sites within a mile that would have an adverse environmental impact to the subject site.

ENVIRONMENTAL CLEANUP LIENS

Under All Appropriate Inquiries and ASTM E 1527-05, a search for environmental cleanup liens must be conducted. EDR was contacted to provide a search of recorded environmental cleanup liens. No recorded environmental cleanup liens were found for the subject site. A copy of the EDR Environmental Lien Search Report is included within Appendix I.

PROPERTY MARKET VALUE

Under All Appropriate Inquiries, persons who are seeking to establish the innocent landowner defense, bona fide prospective purchaser liability protection, or contiguous property owner liability protection under CERCLA, must consider the relationship of the purchase price to the value of the property, if the property was not contaminated. However, our report is being conducted for the owner with no information provided to us regarding the nature, if any, of any transaction, sale, or refinance of the property. Therefore, there can be no consideration of the relationship of the purchase price to the value of the property.

DATA GAPS

Under All Appropriate Inquires, data gaps that remain after the conduct of all required activities must be identified. The source of information consulted to address the data gaps should be identified, and the significance of the data gaps with respect to our ability to identify conditions indicative of releases or threatened release of hazardous substances on, at, in, or to the property should be addressed.

The Fair Market Value of the property was not addressed in this report, however, as this report is being done for the current owner of the property it is not a significant data gap and no significant data gaps remain after our conduct of the All Appropriate Inquiries.

CONCLUSIONS AND RECOMMENDATIONS

The subject site is located on both the west and east side of Perris Boulevard. Site usage at both locations was vacant/agricultural land prior to the development of recreational vehicle (RV) manufacturing facilities in 1985 at 3411 N. Perris Boulevard and 2000 at 100 W. Sinclair Street. Weekend Warrior, a trailer manufacturer, occupies the north portion of Building 4 at the 100 W. Sinclair Street facility. Hazardous materials are used at the site in the RV and trailer manufacturing process. Hazardous materials at the site include: propane, thinners, anti-freeze transmission fluid, motor oil, gear oil, resins, paint, undercoating, gasoline, diesel, peroxides, methyl ethyl ketone (MEK), glues/adhesives, aliphatic dibasic acid esters, diphenylmethane-diisocyanite, acetone, and oxygen, acetylene, and argon/carbon dioxide mix gases. The facility is registered with the County of Riverside, Department of Environmental Health

as a hazardous waste generator, hazardous material handler, and underground storage tank operator. Other agencies that permit the facility for their manufacturing processes are the South Coast Air Quality Management District and Regional Water Quality Control Board. The 3411 N. Perris Boulevard facility has an 8,000-gallon gasoline underground storage tank, three in-ground hydraulic lifts, and 250- and 500-gallon diesel aboveground storage tanks.

There are no properties listed with the regulatory agencies within a one-mile radius which might pose an adverse environmental impact to the subject site.

We have performed this Phase I ESA in general accordance with ASTM E 1527-05 and All Appropriate Inquiries set forth in 40 CFR part 312 for the National RV facility, located at 3411 N. Perris Boulevard and 100 W. Sinclair Street, in the city of Perris, California. Based on the results of this Phase I ESA, the subject site does not appear to have any recognized environmental conditions indicative of releases or threatened releases of hazardous substances on, at, in, or to the subject site.

However, potential REC's include the 8,000-gallon UST and poor housekeeping practices at the Weekend Warrior facility. The UST at the 3411 N. Perris Boulevard site is a double-walled fiberglass UST with upgraded double-walled piping. The UST and piping are placed in a gravel backfill, have current permits with the CRDEH, electronic leak detection system, and no reported unauthorized releases, however, these do not preclude the possibility that a release of gasoline has occurred at the site. Poor housekeeping at the Weekend Warrior facility includes improper storage, and no secondary containment for the hazardous materials and paint spills.

At a minimum, we would recommend regulatory requirements for the UST permitting, which includes tank and line tightness tests, continue to be performed on the UST system and the housekeeping practices at Weekend Warrior be improved.

STATEMENT OF QUALIFICATIONS

We have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. We have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

National RV, Inc.
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Mr. M. Kevin Osmun has over 19 years experience in the environmental field. Mr. Osmun directs LOR Geotechnical Group's environmental operations and has conducted over 400 Phase I Environmental Site Assessments for the private and public sectors. The properties have ranged from agricultural to commercial/industrial. In addition to his experience with environmental assessments for property transfers, he has managed projects that require mitigation prior to and during development. Mr. Osmun is well versed in hazardous waste sampling and characterization methodologies in soil and groundwater regimes and risk assessments. Projects have ranged from leaking USTs, solid waste landfills, TSD facility closures to single spill response. LOR Geotechnical Group, Inc. is one of three firms that provides report review for underground storage tank closure for the County of San Bernardino, Fire Department Hazardous Materials Division.

Mr. Osmun has a B.S. in geology from Wayne State University, Detroit, Michigan. He is a Registered Professional Civil Engineer and Environmental Assessor II in the State of California.

LIMITATIONS

This report was prepared solely for the use and benefit of LOR's client, National RV, Inc. and their designates, they may release this information to third parties, who may use and rely upon this information at their discretion. However, any use of or reliance upon this information by a party other than National RV, Inc. and their designates, shall be solely at the risk of such third party and without legal recourse against LOR Geotechnical Group, Inc.; its subsidiaries and affiliates; or their respective employees, officers, or directors; regardless of whether the action in which recovery of damages is sought is based upon contract, statute, or otherwise. This information shall not be used or relied upon by a party which does not agree to be bound by the above statement.

The content and conclusions provided by LOR in this assessment are based on information collected during our investigation, which may include, but is not limited to, visual site inspections, interviews with the site owner, regulatory agencies and other pertinent individuals, a review of available public documents, subsurface exploration and laboratory testing of soil samples, and our professional judgement based on said information at the time of preparation of this document. Any subsurface samples

results and observations presented herein are considered to be representative of the area of investigation; however, soil conditions may vary between sample locations and may not necessarily apply to the general site as a whole. If future subsurface or other conditions are revealed which may vary from these findings, the newly-revealed conditions must be evaluated and may invalidate the conclusions of this report.

This report has been prepared in accordance with generally accepted practices using standards of care and diligence normally practiced by recognized consulting firms performing services of a similar nature. LOR Geotechnical Group, Inc. (LOR) is not responsible for the accuracy of information provided by other individuals or entities which is used in this report. This report presents our professional judgement based upon data and findings identified in this report, and the interpretation of such data based upon our experience and background, and no warranty, either expressed or implied, is made. The conclusions presented are based upon the current regulatory climate and may require revision if future regulatory changes occur.

TIME LIMITATIONS

The findings of this report are valid as of this date. Changes in the condition of a property can, however, occur with the passage of time, whether they be due to natural processes or the work of man on this or adjacent properties. In addition, changes in the Standards-of-Practice and/or Governmental Codes may occur. Due to such changes, the findings of this report may be invalidated wholly or in part by changes beyond our control. Therefore, this report should not be relied upon after a significant amount of time without a review by LOR Geotechnical Group, Inc., verifying the suitability of the conclusions and recommendations.

National RV, Inc.
October 15, 2006

Project No. 11220A.2

CLOSURE

We declare that, to the best of our professional knowledge and belief, we meet the definition of Environmental Professional as defined in § 312.10 of 40 CFR part 312.

We appreciate this opportunity to be of service and trust this report provides the information desired at this time. Should questions arise, please do not hesitate to contact this office.

Respectfully submitted,
LOR Geotechnical Group, Inc.

M. Kevin Osmun, PE, REA II
Vice President

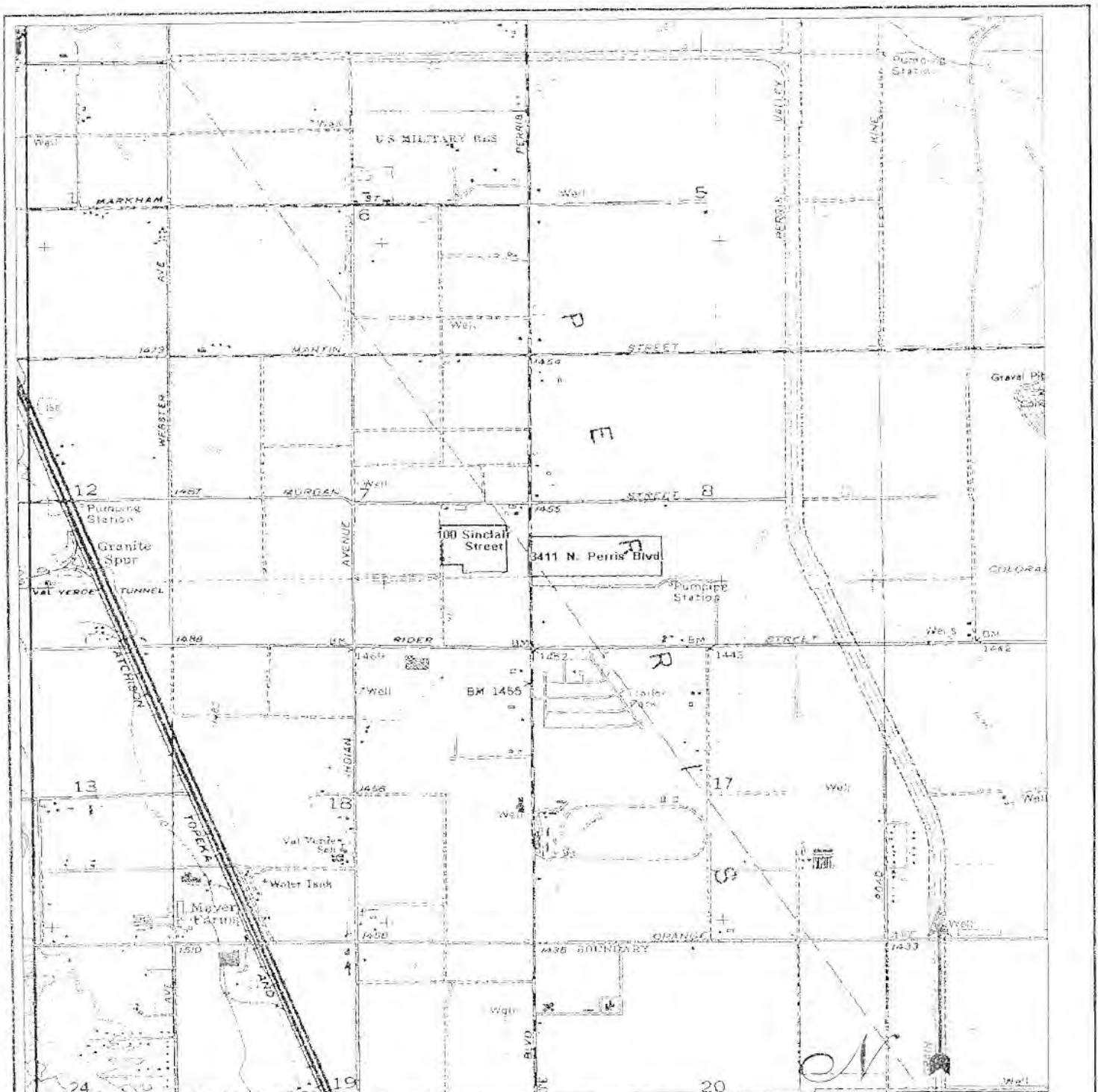
MLH:MKO/mmm

Distribution: Addressee (2)



APPENDIX A

Index Map, Assessor's Parcel Map,
and Color Photographs



3-D TopoQGIS Copyright © 1999 DeLorme, Westbrook, ME 04096 Source Data: USGS 999 ft Scale 1:24,000 Dersik 13-0 Datum: WGS84

INDEX MAP

PROJECT:	3411 N. PERIS BOULEVARD & 100 W. SINCLAIR STREET, PERRIS, CA	PROJECT NO.: 11220A.2
CLIENT:	NATIONAL RV, INC.	ENCLOSURE: A-1
LOR Geotechnical Group, Inc.		DATE: OCTOBER, 2006
		SCALE: REDUCED

303-12

T.P. 4.008-021

POR. SW 1/4 SEC. 8 T4S-R3W

THIS MAP IS FOR
ASSESSMENT PURPOSES ONLY

11



DATE	OLD NUMBER	NEW NUMBER
3/7/79	1	2/11
1/2/81	1, 2	2
12/28/81	4	15-8
3/22/82	13	15-2
4/1/82	1, 2, 3	21
11/22/82	1	23-21

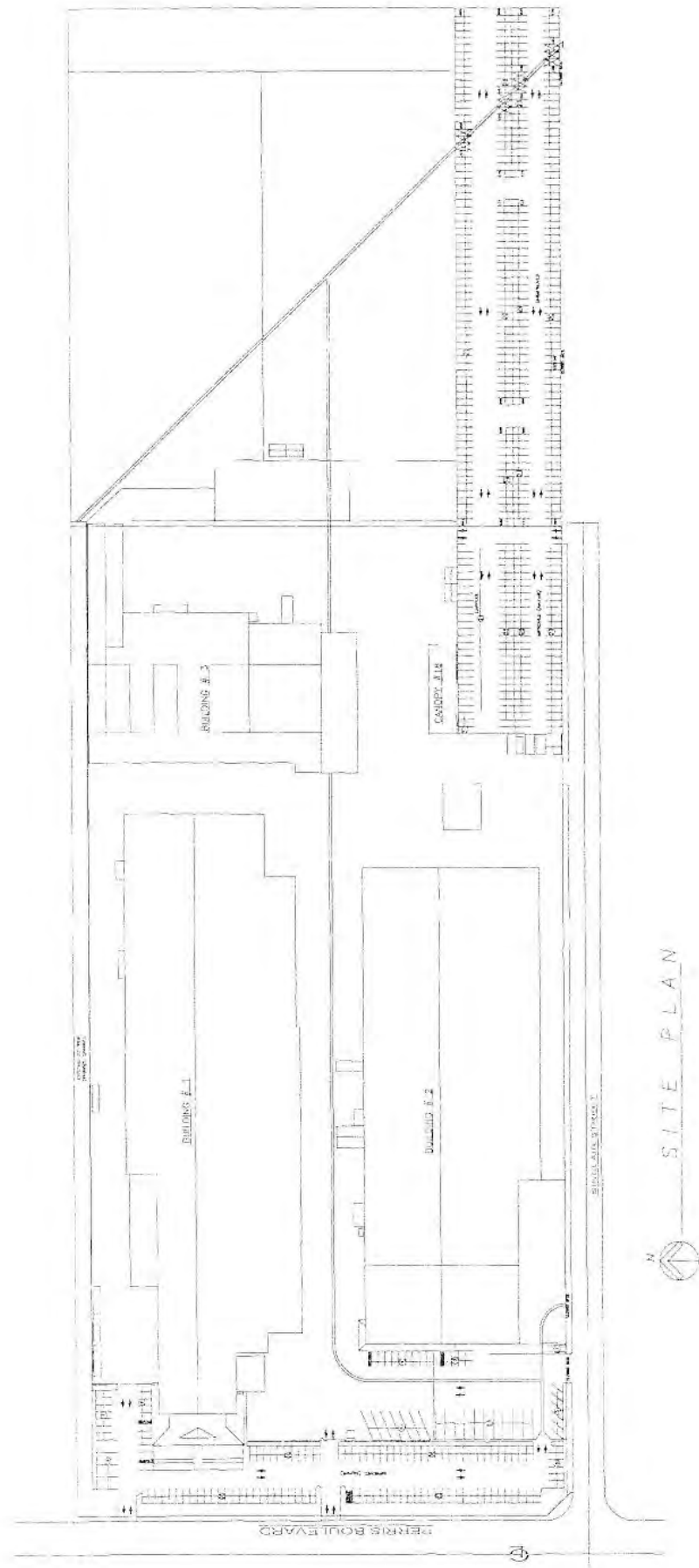
M.B. 14/662 SD. Riverside Tract
 2074 23 11/11 1/10
 APRIL 1971

P.M. 55/19 Parcel Map 11353
 P.M. 153/190-21 Parcel Map 21785

ASSESSOR'S MAP BK 303
 RIVERSIDE COUNTY, CALIF.
 215

ASSESSOR'S PARCEL MAP

PROJECT:	3411 N. PERRIS BLVD. & 100 W. SINCLAIR STREET, PERRIS, CA	PROJECT NO.:	11220A.2
CLIENT:	NATIONAL RV, INC.	ENCLOSURE:	A-2
LOR Geotechnical Group, Inc.		DATE:	OCTOBER 2006
		SCALE:	REDUCED



3411 N. Perris Boulevard

Job description:
 Install 4 new Truck Dismantling Booths
 Spray booths, Dim. 15'0x6'0(DxLxH) ea.

Table of Contents:

Sheet Title

1. Plot Sheet
2. Floor Plan
3. Four Spray booth Inls.
4. Four booth electrical
5. Four Booth Door detail

BUILDING DATA

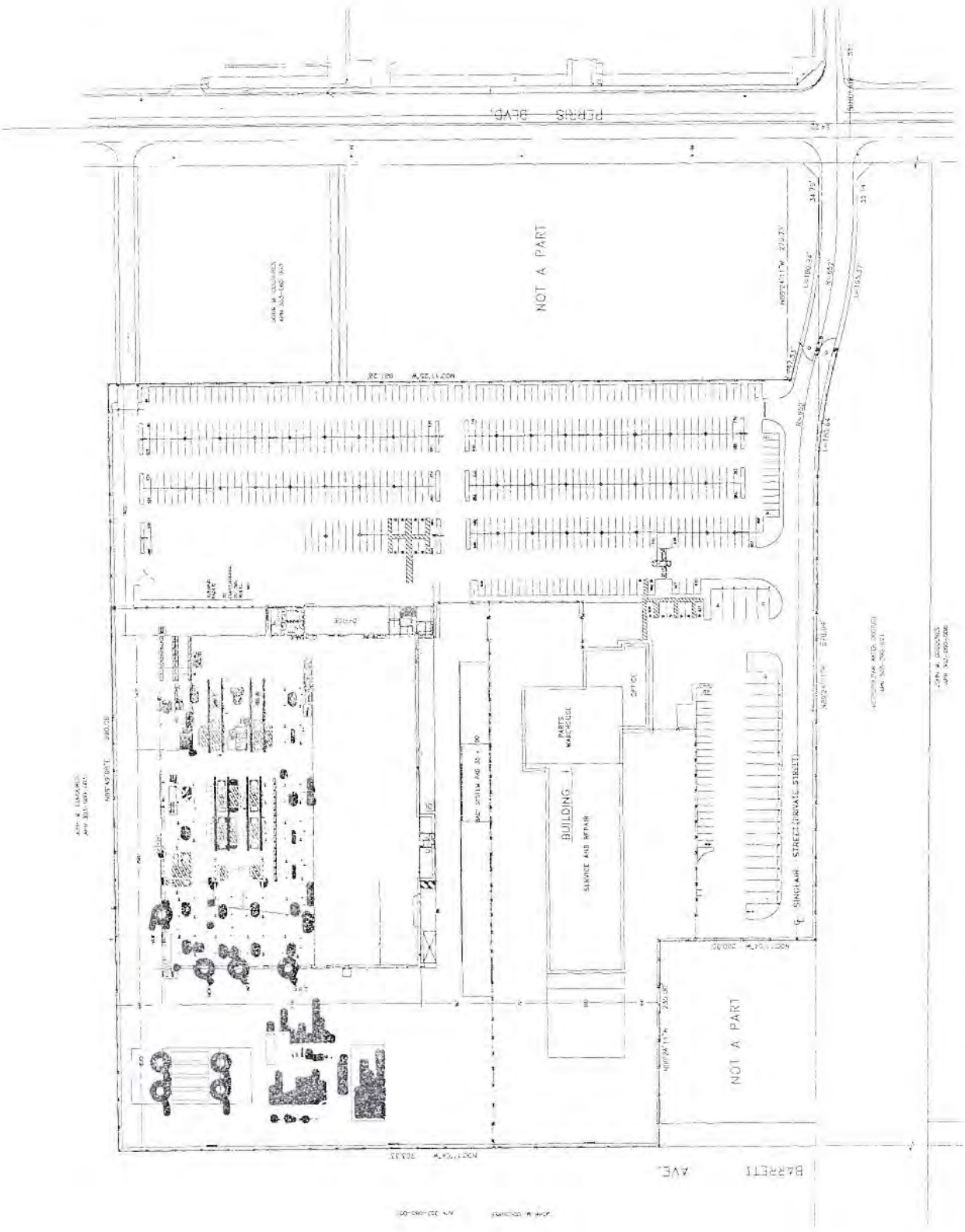
BUILDING #1

OFFICE
 OCCUPANCY: B
 BUILDING TYPE: V N
 TOTAL AREA: 10,011

MANUFACTURING:

OCCUPANCY: I 2
 BUILDING TYPE: II N
 TOTAL AREA: 130,930

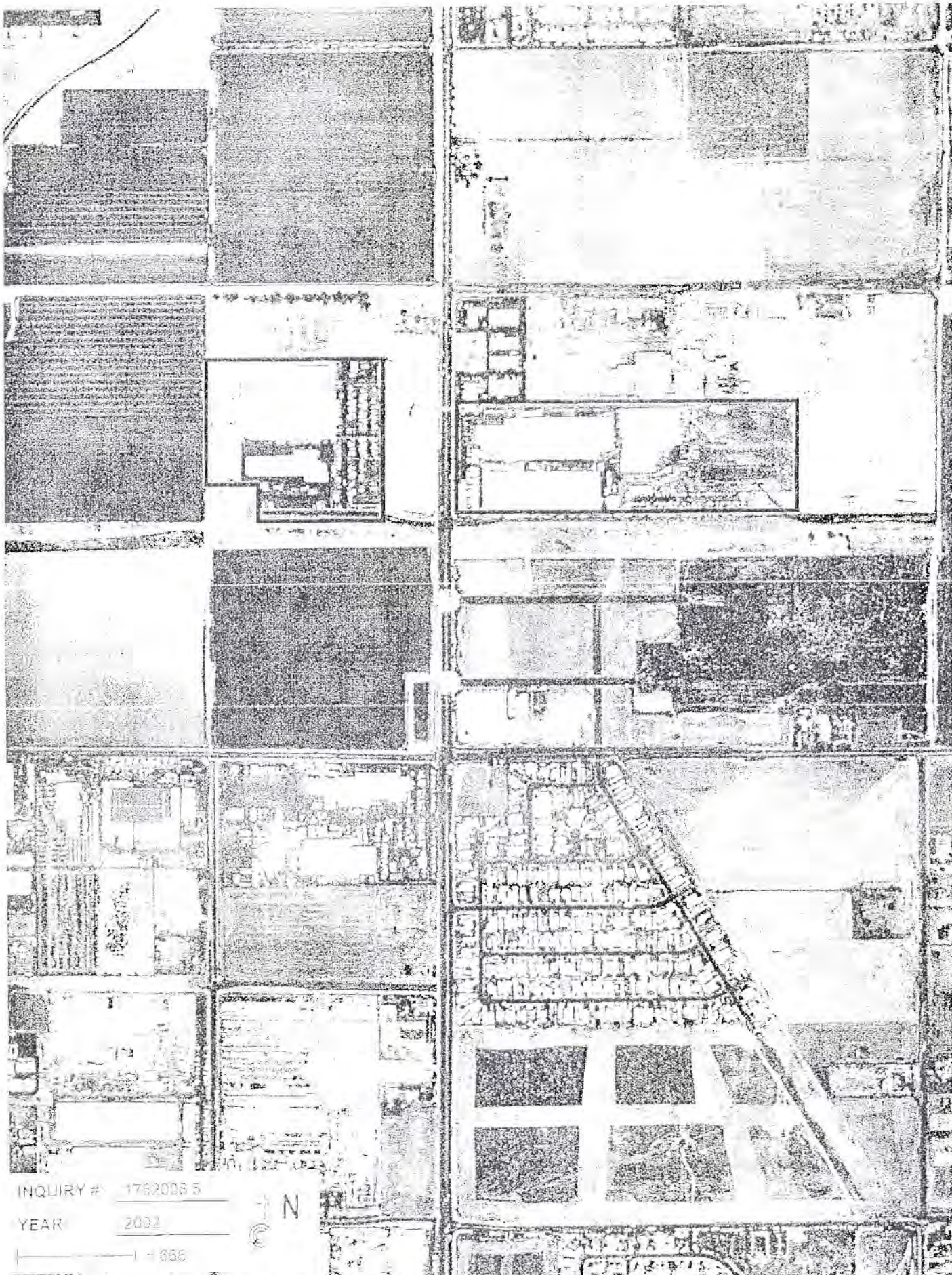
100 W. Sinclair Street



Site Plan of proposed truck paint spray booths

APPENDIX B

Historical Aerial Photographs



INQUIRY # 1752008 5
YEAR 2002
1:856





INQUIRY # 1530085

YEAR: 1974

 1000'

N

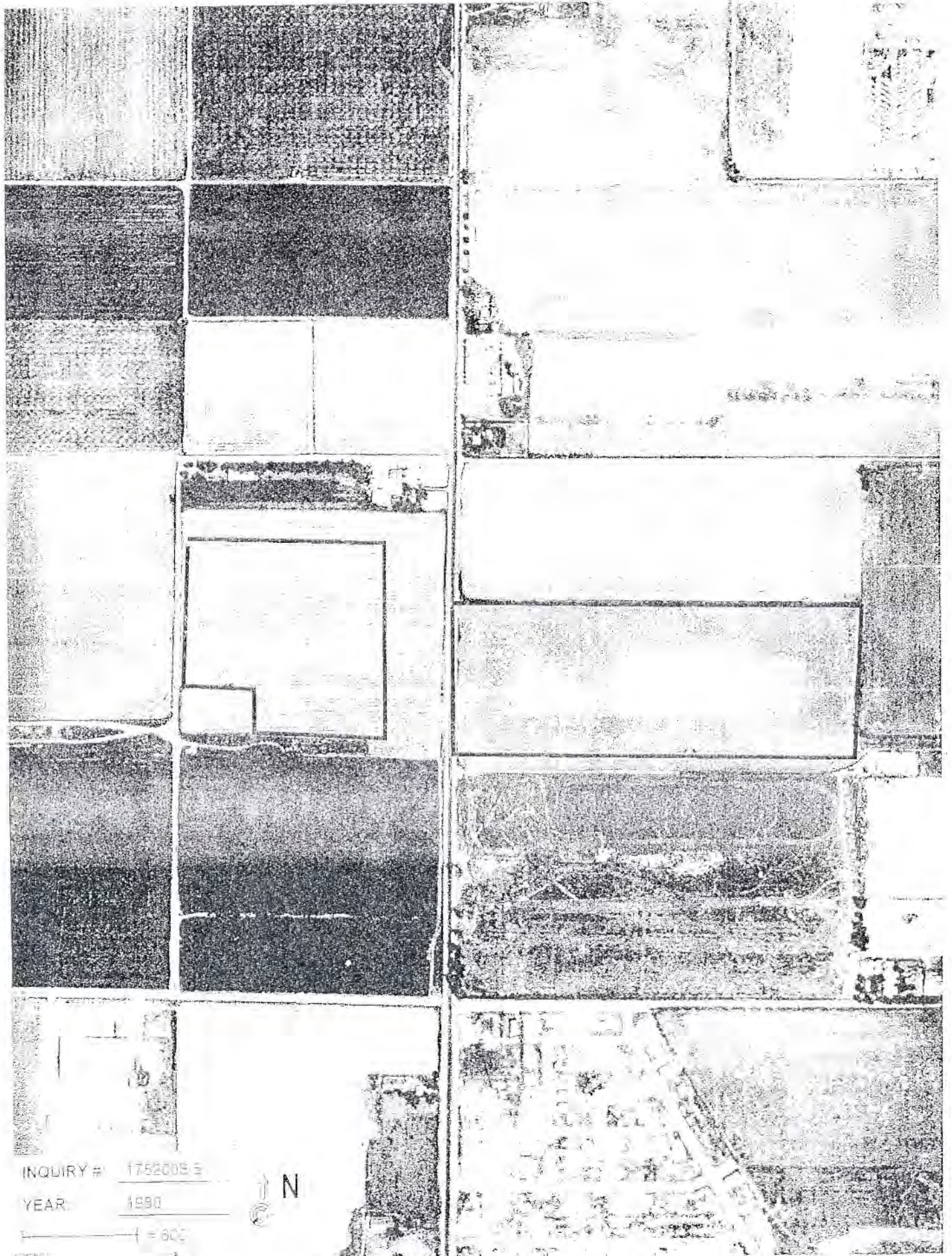


INQUIRY #. 1752008 B

YEAR: 1969

1" = 800'





INQUIRY # 1752008 E

YEAR 1990

1" = 800'





INQUIRY #: 1752008 5

YEAR: 1967

— = 500'





INQUIRY # 1752008 5

YEAR 1953 1462

— = 555

T N

255-214



APPENDIX C

The EDR - City Directory *Abstract*



EDR Environmental
Data Resources Inc.

The EDR-City Directory
Abstract

National RV
3411 Perris Blvd
Perris, CA 92571

Inquiry Number: 1752008.6

Thursday, September 14, 2006

**The Standard in
Environmental Risk
Management Information**

440 Wheelers Farms Road
Milford, Connecticut 06461

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

EDR City Directory Abstract

Environmental Data Resources, Inc.'s (EDR) City Directory Abstract is a screening report designed to assist environmental professionals in evaluating potential liability on a target property resulting from past activities. EDR's City Directory Abstract includes a search and abstract of available city directory data. For each address, the directory lists the name of the corresponding occupant at five year intervals.

Thank you for your business
Please contact EDR at 1-800-352-0050
with any questions or comments.

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This Report contains certain information obtained from a variety of public and other sources reasonably available to Environmental Data Resources, Inc. It cannot be concluded from this Report that coverage information for the target and surrounding properties does not exist from other sources. **NO WARRANTY EXPRESSED OR IMPLIED, IS MADE WHATSOEVER IN CONNECTION WITH THIS REPORT. ENVIRONMENTAL DATA RESOURCES, INC. SPECIFICALLY DISCLAIMS THE MAKING OF ANY SUCH WARRANTIES, INCLUDING WITHOUT LIMITATION, MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE. ALL RISK IS ASSUMED BY THE USER. IN NO EVENT SHALL ENVIRONMENTAL DATA RESOURCES, INC. BE LIABLE TO ANYONE, WHETHER ARISING OUT OF ERRORS OR OMISSIONS, NEGLIGENCE, ACCIDENT OR ANY OTHER CAUSE, FOR ANY LOSS OR DAMAGE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL, CONSEQUENTIAL, OR EXEMPLARY DAMAGES. ANY LIABILITY ON THE PART OF ENVIRONMENTAL DATA RESOURCES, INC. IS STRICTLY LIMITED TO A REFUND OF THE AMOUNT PAID FOR THIS REPORT.** Purchaser accepts this Report "AS IS". Any analyses, estimates, ratings, environmental risk levels or risk codes provided in this Report are provided for illustrative purposes only, and are not intended to provide, nor should they be interpreted as providing any facts regarding, or prediction or forecast of, any environmental risk for any property. Only a Phase I Environmental Site Assessment performed by an environmental professional can provide information regarding the environmental risk for any property. Additionally, the information provided in this Report is not to be construed as legal advice.

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SUMMARY

▪ *City Directories:*

Business directories including city, cross reference and telephone directories were reviewed, if available, at approximately five year intervals for the years spanning 1970 through 2005. (These years are not necessarily inclusive.) A summary of the information obtained is provided in the text of this report.

Date EDR Searched Historical Sources: September 14, 2006

Target Property:

3411 Perris Blvd
Perris, CA 92571

<u>Year</u>	<u>Uses</u>	<u>Source</u>
1970	Street Not Listed in Research Source	Haines Criss-Cross Directory
1975	Street Not Listed in Research Source	Haines Criss-Cross Directory
1980	Address Not Listed in Research Source	Haines Criss-Cross Directory
1985	Address Not Listed in Research Source	Haines Criss-Cross Directory
1990	Address Not Listed in Research Source	Haines Criss-Cross Directory
1995	No Return	Haines Criss-Cross Directory
2000	National RV Inc Parts & Service	Haines Criss-Cross Directory
2005	National RV Inc Parts & Service	Haines Criss-Cross Directory

Adjoining Properties

SURROUNDING

Multiple Addresses
Perris, CA 92571

<u>Year</u>	<u>Uses</u>	<u>Source</u>
1970	Street Not Listed in Research Source	Haines Criss-Cross Directory
1975	Street Not Listed in Research Source	Haines Criss-Cross Directory
1980	Address Not Listed in Research Source	Haines Criss-Cross Directory
1985	Address Not Listed in Research Source	Haines Criss-Cross Directory
1990	Address Not Listed in Research Source	Haines Criss-Cross Directory
1995	<u>**Perris Blvd**</u>	Haines Criss-Cross Directory
	No Return (3515)	Haines Criss-Cross Directory
	No Return (3519)	Haines Criss-Cross Directory
	Residence (3532)	Haines Criss-Cross Directory
	No other addresses in 3300-3532 range	Haines Criss-Cross Directory

<u>Year</u>	<u>Uses</u>	<u>Source</u>
1995	<u>**Sinclair**</u>	Haines Criss-Cross Directory
	Address not listed in research source (100)	Haines Criss-Cross Directory
2000	<u>**Perris Blvd**</u>	Haines Criss-Cross Directory
	No Return (3515)	Haines Criss-Cross Directory
	No Return (3519)	Haines Criss-Cross Directory
	Residence (3532)	Haines Criss-Cross Directory
	No other addresses in 3300-3532 range	Haines Criss-Cross Directory
	<u>**Sinclair**</u>	Haines Criss-Cross Directory
	Address not listed in research source (100)	Haines Criss-Cross Directory
2005	<u>**Perris Blvd**</u>	Haines Criss-Cross Directory
	Lakeside Transmissions (3515)	Haines Criss-Cross Directory
	Perris Industrial & Truck (3515)	Haines Criss-Cross Directory
	Freedom Community Christian Church (3519)	Haines Criss-Cross Directory
	Residence (3532)	Haines Criss-Cross Directory
	<u>**Sinclair**</u>	Haines Criss-Cross Directory
	Address not listed in research source (100)	Haines Criss-Cross Directory

APPENDIX D

The Sanborn® Map Report



EDR® Environmental
Data Resources Inc

"Linking Technology with Tradition"®

Sanborn® Map Report

Ship To: M. Kevin Osmon
LOR Geotechnical Group
6121 Quail Valley Court
Riverside, CA 92507

Order Date: 9/11/2006 Completion Date: 9/11/2006

Inquiry #: 1752008.3

P.O. #: NA

Site Name: National RV

Address: 3411 Perris Blvd & 100 Sinclair

City/State: Perris, CA 92571

Cross Streets:

Customer Project: NA
1028974BAR 951-653-1760

This document reports that the largest and most complete collection of Sanborn fire insurance maps has been reviewed based on client supplied information, and fire insurance maps depicting the target property at the specified address were not identified.

NO COVERAGE

This Report contains certain information obtained from a variety of public and other sources reasonably available to Environmental Data Resources, Inc. It cannot be concluded from this Report that coverage information for the target and surrounding properties does not exist from other sources. NO WARRANTY EXPRESSED OR IMPLIED IS MADE WHATSOEVER IN CONNECTION WITH THIS REPORT. ENVIRONMENTAL DATA RESOURCES, INC. SPECIFICALLY DISCLAIMS THE MAKING OF ANY SUCH WARRANTIES, INCLUDING WITHOUT LIMITATION, MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE. ALL RISK IS ASSUMED BY THE USER. IN NO EVENT SHALL ENVIRONMENTAL DATA RESOURCES, INC. BE LIABLE TO ANYONE, WHETHER ARISING OUT OF ERRORS OR OMISSIONS, NEGLIGENCE, ACCIDENT OR ANY OTHER CAUSE, FOR ANY LOSS OF DAMAGE, INCLUDING WITHOUT LIMITATION, SPECIAL, INCIDENTAL, CONSEQUENTIAL, OR EXEMPLARY DAMAGES. ANY LIABILITY ON THE PART OF ENVIRONMENTAL DATA RESOURCES, INC. IS STRICTLY LIMITED TO A REFUND OF THE AMOUNT PAID FOR THIS REPORT. Purchaser accepts this Report AS IS. Any analyses, estimates, ratings, environmental risk levels or risk codes provided in this Report are provided for illustrative purposes only, and are not intended to provide, nor should they be interpreted as providing any facts regarding, or prediction or forecast of, any environmental risk for any property. Only a Phase I Environmental Site Assessment performed by an environmental professional can provide information regarding the environmental risk for any property. Additionally, the information provided in this Report is not to be construed as legal advice.

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APPENDIX E

USGS Historical Topographic Maps

EDR Historical Topographic Map Report

National RV
3411 Perris Blvd & 100 Sinclair
Perris, CA 92571

Inquiry Number: 1752008.4

September 11, 2006



EDR® Environmental
Data Resources Inc

The Standard in
Environmental Risk
Management Information

440 Wheelers Farms Rd
Milford, Connecticut 06461

Nationwide Customer Service

Telephone: 1-800-352-0050
Fax: 1-800-231-6802
Internet: www.edrnet.com

EDR Historical Topographic Map Report

Environmental Data Resources, Inc.'s (EDR) Historical Topographic Map Report is designed to assist professionals in evaluating potential liability on a target property resulting from past activities. EDR's Historical Topographic Map Report includes a search of a collection of public and private color historical topographic maps, dating back to the early 1900s.

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

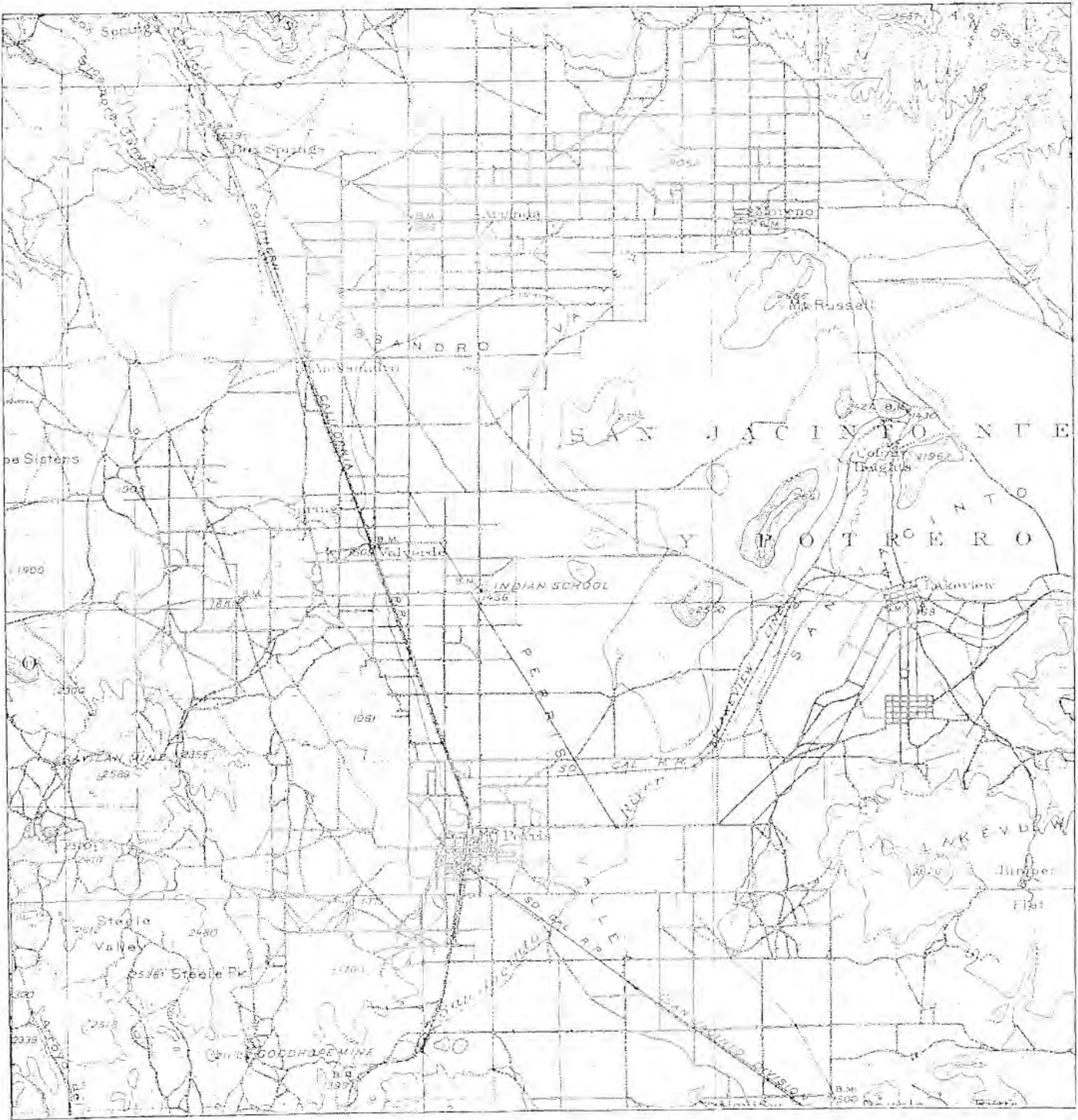
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This Report contains certain information obtained from a variety of public and other sources reasonably available to Environmental Data Resources, Inc. It cannot be concluded from this Report that coverage information for the target and surrounding properties does not exist from other sources. **NO WARRANTY EXPRESSED OR IMPLIED, IS MADE WHATSOEVER IN CONNECTION WITH THIS REPORT. ENVIRONMENTAL DATA RESOURCES, INC. SPECIFICALLY DISCLAIMS THE MAKING OF ANY SUCH WARRANTIES, INCLUDING WITHOUT LIMITATION, MERCHANTABILITY OR FITNESS FOR A PARTICULAR USE OR PURPOSE. ALL RISK IS ASSUMED BY THE USER. IN NO EVENT SHALL ENVIRONMENTAL DATA RESOURCES, INC. BE LIABLE TO ANYONE, WHETHER ARISING OUT OF ERRORS OR OMISSIONS, NEGLIGENCE, ACCIDENT OR ANY OTHER CAUSE, FOR ANY LOSS OF DAMAGE, INCLUDING, WITHOUT LIMITATION, SPECIAL, INCIDENTAL, CONSEQUENTIAL, OR EXEMPLARY DAMAGES. ANY LIABILITY ON THE PART OF ENVIRONMENTAL DATA RESOURCES, INC. IS STRICTLY LIMITED TO A REFUND OF THE AMOUNT PAID FOR THIS REPORT.** Purchaser accepts this Report AS IS. Any analyses, estimates, ratings, environmental risk levels or risk codes provided in this Report are provided for illustrative purposes only, and are not intended to provide, nor should they be interpreted as providing any facts regarding, or prediction or forecast of, any environmental risk for any property. Only a Phase I Environmental Site Assessment performed by an environmental professional can provide information regarding the environmental risk for any property. Additionally, the information provided in this Report is not to be construed as legal advice.

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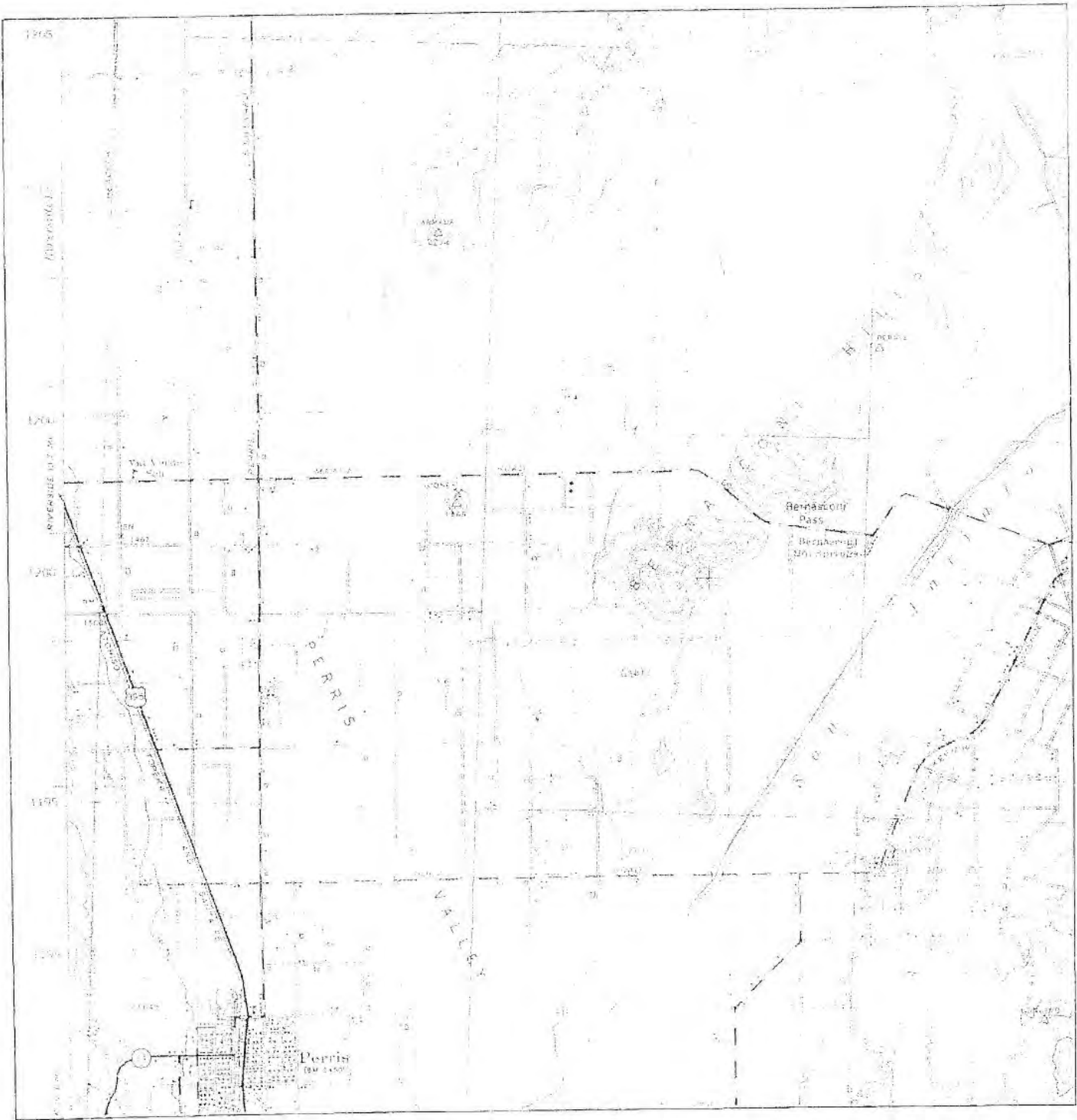
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Historical Topographic Map



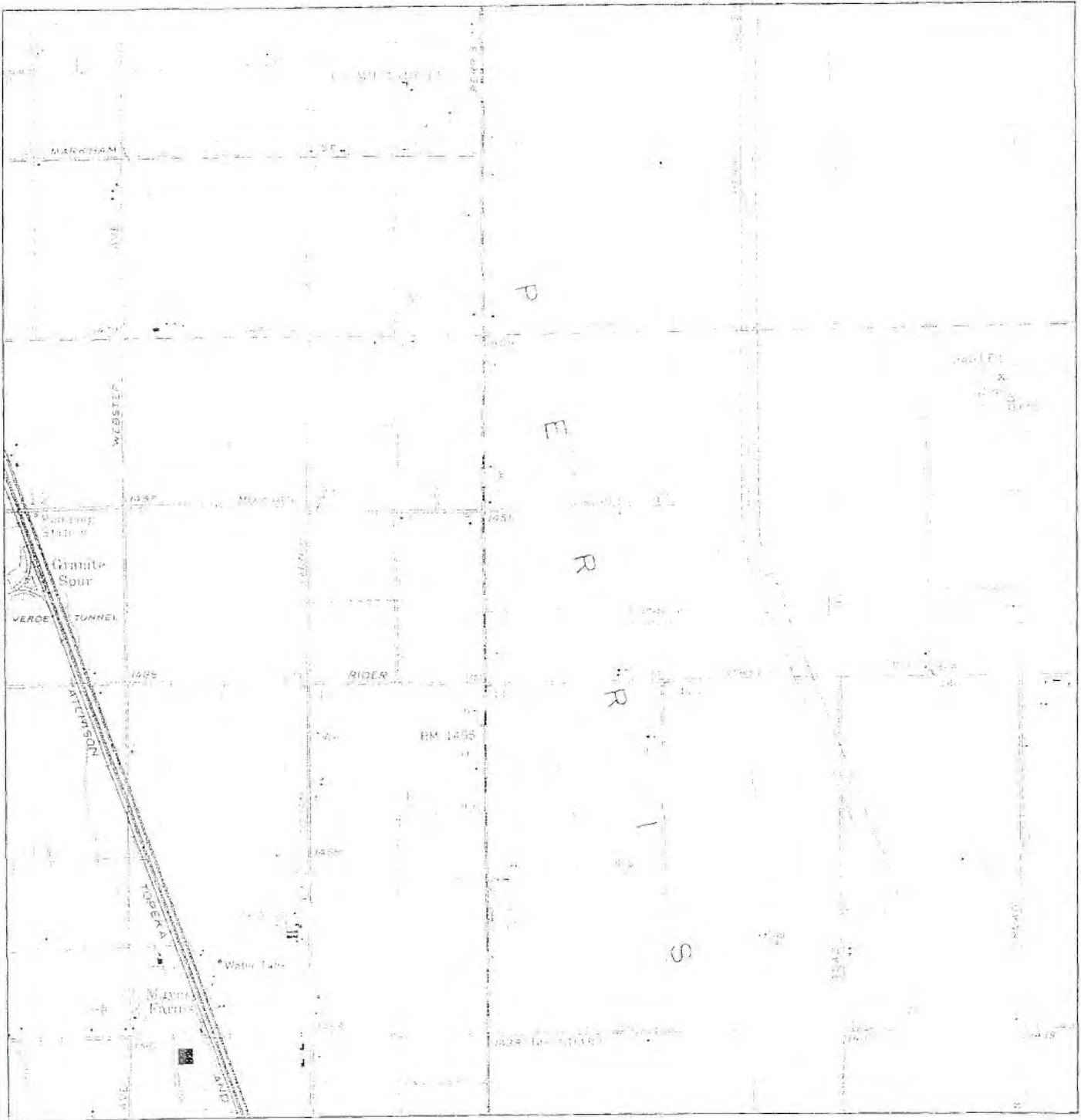
<p>N ↑</p>	<p>TARGET QUAD NAME: ELSINORE MAP YEAR: 1901</p>	<p>SITE NAME: National RV ADDRESS: 3411 Perris Blvd & 100 Sinclair Perris, CA 92571 LAT/LONG: 33.8341 / 117.2261</p>	<p>CLIENT: LOR Geotechnical Group, Inc. CONTACT: M. Kevin Osmun INQUIRY#: 1752008.4 RESEARCH DATE: 09/11/2006</p>
	<p>SERIES: 30 SCALE: 1:125000</p>		


Historical Topographic Map



<p>N ↑</p>	<p>TARGET QUAD NAME: PERRIS MAP YEAR: 1943</p>	<p>SITE NAME: National RV ADDRESS: 3411 Perris Blvd & 100 Sinclair Perris, CA 92571 LAT/LONG: 33.8341 / 117.2261</p>	<p>CLIENT: LOR Geotechnical Group, Inc. CONTACT: M. Kevin Osmun INQUIRY#: 1752008.4 RESEARCH DATE: 09/11/2006</p>
	<p>SERIES: 15 SCALE: 1:62500</p>		

Historical Topographic Map



N 	TARGET QUAD	SITE NAME:	National RV	CLIENT:	LOR Geotechnical Group, Inc.
	NAME: PERRIS	ADDRESS:	3411 Perris Blvd & 100 Sinclair	CONTACT:	M. Kevin Osmun
	MAP YEAR: 1967		Perris, CA 92571	INQUIRY#:	1752008.4
		LAT/LONG:	33.8341 / 117.2261	RESEARCH DATE:	09/11/2006
	SERIES: 7.5				
	SCALE: 1:24000				

APPENDIX F
CRDEH Records



COUNTY OF RIVERSIDE • COMMUNITY HEALTH AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH

Certified Unified Program Agency

**HAZARDOUS MATERIALS MANAGEMENT PERMIT
 NON-TRANSFERABLE**

Owner: Attn: Jon Morgan
 DBA: National RV, Inc
 Mailing Address: 3411 N Perris Blvd
 City and State: Perris, CA 92571

EPA ID#: CAD981993454

Facility Number: 82241

Expiration Date: 10/23/2006

Type of Business: Hazardous Materials Facility

Area: 2 District: 3

Facility Location: 3411 N Perris Blvd

City: Perris

- Hazardous Waste Generator -- County Ordinance No. 615
- Hazardous Materials Disclosure -- County Ordinance No. 651
- Underground Storage Tanks -- County Ordinance No. 617

Tuesday, October 18, 2005

Date Issued

Gary L. Root
 Gary L. Root, Director
 Department of Environmental Health

Tank Volume	Tank ID Number	Material Stored	Monitoring Option	MonOptPiping
8000		Regular Unleaded	312	

This permit is granted for the business indicated on the condition that the business will comply with the laws, ordinances, and regulations that are now or may hereafter be in force by the United States Government, the State of California and the County of Riverside pertaining to the above mentioned business. This permit serves as a receipt for payment of fees for the above-listed programs. This permit must be renewed on the Expiration Date indicated above. This permit may be suspended or revoked for cause. Inspection of this business may be conducted by a duly authorized representative of the Department of Environmental Health.

Western County Office
 4065 County Circle Dr.
 Riverside, CA 92503
 (951) 358-5055

Desert County Office
 47-923 Oasis Street E4
 Indio, CA 92201
 (760) 863-8976

Central County Office
 800 South Sanderson Avenue
 Hemet, CA 92545
 (951) 766-6524

POST IN A CONSPICUOUS PLACE



COUNTY OF RIVERSIDE • COMMUNITY HEALTH AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH

Certified Unified Program Agency

HAZARDOUS MATERIALS MANAGEMENT PERMIT
NON-TRANSFERABLE

Owner: Attn: Jon Morgan
 DBA: National RV, Inc

Facility Number: 89073
 Expiration Date: 11/28/2006

Mailing Address: 3411 N Perris Blvd
 City and State: Perris, CA 92571

Area: 2 District: 3

Type of Business: Hazardous Materials Facility

Facility Location: 100 W Sinclair
 City: Perris

Hazardous Waste Generator -- County Ordinance No. 615
 Hazardous Materials Disclosure -- County Ordinance No. 651

Friday, December 30, 2005
 Date Issued

Gary L. Root, Director
 Department of Environmental Health

This permit is granted for the business indicated on the condition that the business will comply with the laws, ordinances, and regulations that are now or may hereafter be in force by the United States Government, the State of California and the County of Riverside pertaining to the above mentioned business. This permit serves as a receipt for payment of fees for the above-listed programs. This permit must be renewed on the Expiration Date indicated above. This permit may be suspended or revoked for cause. Inspection of this business may be conducted by a duly authorized representative of the Department of Environmental Health.

Western County Office
 4065 County Circle Dr.
 Riverside, CA 92503
 (951) 352-5055

Desert County Office
 47-923 Oasis Street E4
 Indio, CA 92201
 (760) 863-8976

Central County Office
 800 South Sanderson Avenue
 Hemet, CA 92545
 (951) 766-6524

11/9/06
POST IN A CONSPICUOUS PLACE

County of Riverside
Community Health Agency
Department of Environmental Health
Hazardous Materials Division

In the Matter of:

National RV
3411 North Perris Blvd.
Perris, CA 92571
Respondent.

Docket # AEOGEN 05-12005

CONSENT ORDER
Health and Safety Code
Section 25404.1.1

INTRODUCTION

1.1. Parties. The Unified Program

Agency/Environmental Health Department (Department) and National RV (Respondent) enter into this Consent Order (Order) and agree as follows:

1.2. Site. Respondent generates, handles, treats, stores, and/or disposes of hazardous materials at the following site (Site): 3411 North Perris Blvd., Perris, CA.

1.3. Permit/Interim Status. The Unified Program Agency authorized Respondent to store hazardous materials and generate hazardous waste through a Unified Program Facility permit.

1.4. Jurisdiction. Section 25404.1.1 of the Health and Safety Code (HSC) authorizes the Department to

order action necessary to correct violations and assess a penalty when the Agency determines that any person has violated specified provisions of the Health and Safety Code or any permit, rule, regulation, standard, or requirement issued or adopted pursuant thereto.

DETERMINATION OF VIOLATIONS

2. The Department has determined:

2.1 Respondent violated the California Health and Safety Code Section 25189.2(b) and Title 22 CCR Section 66261.2(f)(1) - The respondent failed to properly label all drums and containers.

On November 15, 2004, the respondent failed to properly label several containers containing hazardous waste. Labeling violations were noted at the National RV facility located at 3411 North Perris Blvd., Perris.

2.2. Respondent violated the California Health and Safety Code Section 25189.2(b) and Title 22 CCR Section 66265.173(a). The respondent failed to properly close hazardous waste containers.

On November 15, 2004, the respondent failed to properly close and maintain several containers containing hazardous waste. Open drum violations were noted at the National RV facility located at 3411 North Perris Blvd., Perris.

2.3. Respondent violated the California Health and Safety Code Section 25504(c) and Title 19 CCR Section 2732(a)(1). The respondent failed to properly train personnel in the proper method for safe handling of hazardous materials.

On November 15, 2004, the respondent failed to properly train personnel in the safe handling of hazardous materials namely improper containers, unlabeled containers,

incompatible materials not properly segregated and compressed gas cylinders not properly secured.

SCHEDULE OF COMPLIANCE

3. Respondent admits to the violations listed in this Enforcement Order.

3.1 Respondent waives any right to further hearings in this matter. Respondent agrees that due process has been provided with respect to this matter.

3.2 This Consent Order shall constitute full settlement of the violation alleged above. The violations have been corrected.

OTHER PROVISIONS

4.1. Additional Enforcement Actions: By agreeing to this Consent Order, the Department does not waive the right to take further enforcement actions, except to the extent provided in this Consent Order.

4.2. Penalties for Noncompliance: Failure to comply with the terms of this Consent Order may also subject Respondent to costs, penalties, and/or punitive damages for any costs incurred by the Department or other government agencies as a result of such failure, as provided by HSC section 25404.1.1 and other applicable provisions of law.

4.3. Parties Bound: This Consent Order shall apply to and be binding upon Respondent, and its officers, directors, agents, employees, contractors, consultants, receivers, trustees, successors, and assignees, including but not limited to individuals, partners, and subsidiary and parent corporations, and upon the Department and any successor agency that may have responsibility for the jurisdiction over the subject matter of this Consent Order.

4.4. Time Periods. "Days" for purposes of this Order means calendar days.

PENALTY

5.0. Respondent shall pay the Department a total penalty of \$8,000.00. The total penalty will be paid in 2 installments. The payment schedule is as follows:

First payment of \$4000.00 due, January 30, 2006 CK# 188904 1-10-06

Second payment of \$4000.00 due, July 30, 2006

Respondent hereby agrees to send 2 employees to the California Compliance School or its equivalent. Attendance must be completed and Respondent must submit a Certificate of Satisfactory Completion to the Department within 12 months of the date of this Consent Order. If Respondent fails to submit the Certificate of Satisfactory Completion

as required, the penalty of \$5,000.00 is due and payable within 30 days after the expiration of the 12 months.

Respondent's check shall be made payable to the County of Riverside, and shall identify the Respondent and Docket Number, as shown in the heading of this case, and the signed Consent Order shall be mailed with the payment to: Department Of Environmental Health

Hazardous Materials Division
P.O. Box 7489
Riverside, California 92513-7489
Attn. AEO Panel

6.0. Effective Date: The effective date of this Consent Order is the date it is signed by the Department.

7.0. Integration: This Consent Order constitutes the entire agreement between the parties and may not be amended, supplemented, or modified, except as provided in this Consent Order.

8.0. Modification: Any alteration, change or modification of or to this Consent Order, in order to become effective, shall be made by written instrument and each instance executed by or on behalf of the party to be bound thereto.

9.0. Severability: If any term, provision, condition or covenant of this Consent Order or the

application thereof to any party or circumstances shall, to any extent, be held invalid or unenforceable, the remainder of this instrument, or the application of such term, provision, condition or covenant to persons or circumstances other than those to whom or which it is held invalid or unenforceable, shall not be affected thereby, and each term and provision of this Consent Order shall be valid and enforceable to the fullest extent permitted by law.

10.0. Time is of the Essence: Time is hereby expressly made of the essence of this Consent Order and all performances and obligations due hereunder.

11.0. No Waiver: No delay or omission by any party in exercising any right or power accruing upon the compliance or failure of performance by any other party under the provisions of this Consent Order shall impair any such right or power or be construed to be a waiver thereof. A waiver by any party of a breach of any of the conditions or covenants to be performed by any other party under this Order shall not be construed as a waiver of any succeeding breach of the same or other covenants, restrictions or conditions.

12.0. Representations: Each party represents that: (i) they are duly authorized and empowered to execute

this Consent Order and to perform the obligations undertaken by each party herein; (ii) this Consent Order will be binding upon such party in accordance with its terms. The Corporate signatories executing this Consent Order hereby certify and warrant that they have the authority to enter into and execute this Consent Order; that they have the authority to bind their respective corporate entities, and that they have been duly authorized to enter into and execute this Consent Order by any and all requisite corporate action.

Dated: _____

Signature of Respondent's
Respondent

Title of Respondent's
Representative

Dated: 1/9/06

Mike Shetler

Mike Shetler
Department of
Environmental Health
Enforcement Panel Chief

County of Riverside
Community Health Agency
Department of Environmental Health
Hazardous Materials Division

In the Matter of:

National RV
100 West Sinclair Street
Perris, CA 92571
Respondent.

Docket # AEOGEN 05-22005

CONSENT ORDER
Health and Safety Code
Section 25404.1.1

INTRODUCTION

1.1. Parties. The Unified Program

Agency/Environmental Health Department (Department) and National RV (Respondent) enter into this Consent Order (Order) and agree as follows:

1.2. Site. Respondent generates, handles, treats, stores, and/or disposes of hazardous materials at the following site (Site): 100 West Sinclair St., Perris, CA.

1.3. Permit/Interim Status. The Unified Program Agency authorized Respondent to store hazardous materials and generate hazardous waste through a Unified Program Facility permit.

1.4. Jurisdiction. Section 25404.1.1 of the Health and Safety Code (HSC) authorizes the Department to

order action necessary to correct violations and assess a penalty when the Agency determines that any person has violated specified provisions of the Health and Safety Code or any permit, rule, regulation, standard, or requirement issued or adopted pursuant thereto.

DETERMINATION OF VIOLATIONS

2. The Department has determined:

2.1 Respondent violated the California Health and Safety Code Section 25189.2(b) and Title 22 CCR Section 66261.2(f)(1) - The respondent failed to properly label all drums and containers.

On November 17, 2004, the respondent failed to properly label several containers containing hazardous waste. Labeling violations were noted at the National RV facility located at 100 West Sinclair St., Perris.

2.2. Respondent violated the California Health and Safety Code Section 25189.2(b) and Title 22 CCR Section 66265.173(a). The respondent failed to properly close hazardous waste containers.

On November 17, 2004, the respondent failed to properly close and maintain several containers containing hazardous waste. Open container violations were noted at the National RV facility located at 100 West Sinclair St., Perris.

2.3. Respondent violated the California Health and Safety Code Section 25504(c) and Title 19 CCR Section 2732(a)(1). The respondent failed to properly train personnel in the proper method for safe handling of hazardous materials.

On November 17, 2004, the respondent failed to properly train personnel in the safe handling of hazardous materials

namely improper containers, unlabeled containers, and open containers were in use. These violations were noted at the National RV facility located at 100 West Sinclair St., Perris.

SCHEDULE OF COMPLIANCE

3. Respondent admits to the violations listed in this Enforcement Order.

3.1 Respondent waives any right to further hearings in this matter. Respondent agrees that due process has been provided with respect to this matter.

3.2 This Consent Order shall constitute full settlement of the violation alleged above. The violations have been corrected.

OTHER PROVISIONS

4.1. Additional Enforcement Actions: By agreeing to this Consent Order, the Department does not waive the right to take further enforcement actions, except to the extent provided in this Consent Order.

4.2. Penalties for Noncompliance: Failure to comply with the terms of this Consent Order may also subject Respondent to costs, penalties, and/or punitive damages for any costs incurred by the Department or other government agencies as a result of such failure, as

provided by HSC section 25404.1.1 and other applicable provisions of law.

4.3. Parties Bound: This Consent Order shall apply to and be binding upon Respondent, and its officers, directors, agents, employees, contractors, consultants, receivers, trustees, successors, and assignees, including but not limited to individuals, partners, and subsidiary and parent corporations, and upon the Department and any successor agency that may have responsibility for the jurisdiction over the subject matter of this Consent Order.

4.4. Time Periods. "Days" for purposes of this Order means calendar days.

PENALTY

5.0. Respondent shall pay the Department a total penalty of \$8,000.00. The total penalty will be paid in 2 installments. The payment schedule is as follows:

First payment of \$4000.00 due, January 30, 2006 CKA 188904 1-20-06

Second payment of \$4000.00 due, July 30, 2006

Respondent hereby agrees to send 2 employees to the California Compliance School or its equivalent. Attendance must be completed and Respondent must submit a Certificate of Satisfactory Completion to the Department within 12 months of the date of this Consent Order. If Respondent

9.0. Severability: If any term, provision, condition or covenant of this Consent Order or the application thereof to any party or circumstances shall, to any extent, be held invalid or unenforceable, the remainder of this instrument, or the application of such term, provision, condition or covenant to persons or circumstances other than those to whom or which it is held invalid or unenforceable, shall not be affected thereby, and each term and provision of this Consent Order shall be valid and enforceable to the fullest extent permitted by law.

10.0. Time is of the Essence: Time is hereby expressly made of the essence of this Consent Order and all performances and obligations due hereunder.

11.0. No Waiver: No delay or omission by any party in exercising any right or power accruing upon the compliance or failure of performance by any other party under the provisions of this Consent Order shall impair any such right or power or be construed to be a waiver thereof. A waiver by any party of a breach of any of the conditions or covenants to be performed by any other party under this Order shall not be construed as a waiver of any succeeding breach of the same or other covenants, restrictions or conditions.

12.0. Representations: Each party represents that: (i) they are duly authorized and empowered to execute this Consent Order and to perform the obligations undertaken by each party herein; (ii) this Consent Order will be binding upon such party in accordance with its terms. The Corporate signatories executing this Consent Order hereby certify and warrant that they have the authority to enter into and execute this Consent Order; that they have the authority to bind their respective corporate entities, and that they have been duly authorized to enter into and execute this Consent Order by any and all requisite corporate action.

Dated: _____

Signature of Respondent's
Respondent

Title of Respondent's
Representative

Dated: 1/9/06

Mike Shetler

Mike Shetler
Department of
Environmental Health



Certified Unified Program Agency
County of Riverside Community Health Agency
Department of Environmental Health Hazardous Materials Management Division
Hazardous Materials Handler Inspection Report

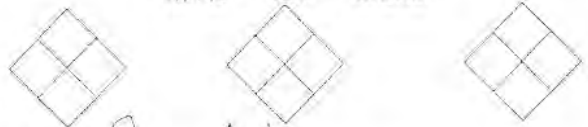
Facility Name: National Rill Date: April 3, 2006
 Address: 100 Sinclair Street Inspection: Routine Reinspection
 City: Pemis Zip Code: 92571 Level: _____ Facility #: 89073
 Contact Person: _____ Number of Employees: _____ Telephone: (951) 943-6007

Riverside County Ordinance 651 California Code of Regulations Title 19 Health & Safety Code Chapter 6.95 California Fire Code

Y N N/A Item marked "No" are violations of the above-referenced codes and must be corrected as follows:

<input checked="" type="checkbox"/>			100. Current Permit	Information on contact is out of DATE and requires updating.
<input checked="" type="checkbox"/>			101. Hazardous Materials Business Emergency Plan	
<input checked="" type="checkbox"/>			A. Approved Plan on Site and Available for Review	
<input checked="" type="checkbox"/>			B. Plan Updated within Past 3 Years	Need to return to confirm employees training records. Need to work on employees regarding non-labeled containers.
<input checked="" type="checkbox"/>			102. Chemical Inventory Disclosure	Severed containers were discarded without labeling as to contents.
<input checked="" type="checkbox"/>			A. Chemical Inventory Complete	
<input checked="" type="checkbox"/>			B. Inventory Updated Annually	
<input checked="" type="checkbox"/>			103. Emergency Response Plans and Procedures	
<input checked="" type="checkbox"/>			A. Prevention, Mitigation and Abatement Measures	
<input checked="" type="checkbox"/>			B. Documented Employee Training	NFPA 704 signs have been posted but not covering all entry points. All signs are to be visible when approaching storage areas.
<input checked="" type="checkbox"/>			C. Evacuation Plan with Routes	
<input checked="" type="checkbox"/>			D. Facility Map with Location of Chemicals	
<input checked="" type="checkbox"/>			E. MSDS Available	
<input checked="" type="checkbox"/>			104. Posting	Need to post signs indicating what materials are being stored. Some signs are currently posted.
<input checked="" type="checkbox"/>			A. NFPA 704 Sign(s) Posted	
<input checked="" type="checkbox"/>			B. Emergency Phone Numbers Posted	
<input checked="" type="checkbox"/>			C. Hazardous Materials Storage Area Posted	
<input checked="" type="checkbox"/>			D. Emergency Equipment Posted	Containers storing hazardous materials on site were storage area. All containers with flammable liquids are to be stored closed.
<input checked="" type="checkbox"/>			E. Pesticide Storage Area Posted	
<input checked="" type="checkbox"/>			105. Storage	
<input checked="" type="checkbox"/>			A. Maintained to Minimize the Possibility of Release	
<input checked="" type="checkbox"/>			B. Handling Areas Secured	One drum of new solvent was labeled as hazardous waste. This is improperly labeled. The hazardous waste label is to be removed.
<input checked="" type="checkbox"/>			C. Incompatibles Stored Separately	
<input checked="" type="checkbox"/>			D. Containers Properly Labeled	
<input checked="" type="checkbox"/>			106. Other	

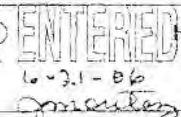
NFPA 704 SIGNS



Specialist: Paul Miller

The above noted violations shall be corrected within 30 days.

Received by: [Signature]
 Print Name: THOMAS LAD
 Title: ENV. ENGINEER





**Certified Unified Program Agency
Department of Environmental Health
Hazardous Materials Management Division
Hazardous Waste Generator Report Form**

PL

Page 1 of

Facility Name: National RV Date: April 3 2006
 Address: 100 Simlain Inspection Routine: Re-inspection
 City: Peris Zip Code: 92571 Facility #: 87073
 Contact Person: _____ Number of Employees: 50 Telephone: (951) 443-6006

Health & Safety Code, Chapter 6.5

California Code of Regulations, Title 22
C-Compliance, Viol. Type=Violation Type, N/A=Non-Applicable

Riverside County Code, Title 8.60 (Ordinance 615.3)

Hazardous Waste Storage	Yes	No	Viol. Type	N/A	General Hazardous Waste Requirements	Yes	No	Viol. Type	N/A
200. H&SC 225195 Access for Inspection	X				225. Riverside County Code Title 8.60 (Ord. 615.3) Hazardous Waste Generator Permit Fees	X			
201. 22 CCR 66265.31 Maintained and Operated to Minimize the Possibility of Fire, Explosion, or Release	X				226. 22CCR 66262.12 (a) EPA ID Number CA	X			
202. 22 CCR 66262.34 Accumulation Time	X				227. 22CCR 66262.11 Hazardous Waste Determination	X			
203. 22 CCR 66262.34 (e) Satellite Accumulation				X	228. H&SC 25189.5(a) Disposed/Treated at an Authorized Location	X			
204. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.177 Separation of Incompatible Materials	X				229. H&SC 25201 (a), 22CCR 66270.1 Treatment/Storage/Transfer/Disposal Permit	X			
Containers					230. H&SC 25143.10 Recycling Plan Complete and Reported				X
205. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.172 Compatibility of Waste with Container	X				231. H&SC 25143.2 Excluded Recyclable Materials				X
206. 22CCR 66262.34 (d) (2), 66262.34 (a) (2), 66262.34 (f) Container Marking and Labeling	X				Records Review				
207. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.174 Weekly Inspections	X				232. H&SC 25160.2, 22CCR 66262.20-66262.23 General Manifesting Requirements	X			
208. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.171 Container Condition	X				233. 22CCR 66262.42 Manifesting Exception Reports		X		
209. 22CCR 66262.173 (b) Containers Not Leaking	X				234. 22CCR 66262.18, 66262.34 (a) (3) Personal Training & Training Documents Maintained & Available	X			
210. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.173 (a) Management of Containers (Stored Closed)		X			235. 22CCR 66268.7 Waste Analysis	X			
211. 22CCR 66265.176, 66262.34 (a) (1) Ignitable or Reactive Wastes Stored At Least 50 ft From Property Line				X	236. 22CCR 67100.1-67100.11 Hazardous Waste Source Reduction & Management Review (Waste Minimization)				X
212. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.35 Aisle Space	X				237. 22CCR 66262.41 Biennial Reports				X
Aboveground Hazardous Waste Tank Systems					Transportation				
213. 22CCR 66265.193 Containment of and Detection of Leaks				X	238. H&SC 25163 (a), 22CCR 66262.10 Use of a Registered Transporter of Hazardous Waste	X			
214. 22CCR 66265.194 Aboveground Tanks Holding Hazardous Waste Operating Requirements				X	Management of Used Oil, Oil Filters & Batteries				
215. 22CCR 66265.195 Inspection of Aboveground Tanks Containing Hazardous Waste				X	239. H&SC 25160.4 Used Oil Managed Properly	X			
216. 22 CCR 66265.196 Leaks, Spills, or Unfit AST's				X	240. H&SC 25160.2 Used Oil Shipment Record Keeping	X			
217. H&SC 25270.5(c) Spill Prevention Control and Countermeasure Plan Complete [Referral to RWQCB if No Plan]				X	241. H&SC 25250.7 Used Oil Not Contaminated with Hazardous Waste	X			
Preparation, Prevention and Contingency Planning					242. 22CCR 66266.130 Used Oil Filters				X
218. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.32 Regulated Fire, Spill, & Decontamination Equipment	X				243. 22CCR 66265.81 Batteries Properly Managed	X			
219. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.33 Testing and Maintenance Fire, Spill, & Decontamination of Equipment	X				Universal Waste				
220. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.34 Access to Communications or Alarms	X				244. 40 CFR 273, 22 CCR 66273 Universal Waste Fluorescent tubes, batteries, and mercury switches	X			
221. 22CCR 66262.34 (d) Evacuation Plan	X				Specific Materials				
222. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.37, 66265.53, 66265.52 (f), 66265.55 Arrangements with Local Authorities	X				245. H&SC 25144.6 Contaminated Rags	X			
223. 22CCR 66262.34 (d) Emergency Coordinator Listed	X				246. H&SC 25143.13, 40 CFR 261 Silver Only Waste				X
224. 66262.34 (a) (3), 66265.52 Emergency Response Procedures	X				247. Other:				

see Attached Supplement Report

The above mentioned violations shall be corrected within 30 days

Specialist: Paul Mitchell

Received By: [Signature]
Print Name: FUSHER LAW

Title: _____

DEHEM-622/RV/7/06
CR/61

Phone: (951) 261-2276
47600 Cass Rd. Rm 24
P.O. Box 9200

Internet: (951) 759-6524
800 S. Sanders Rd
Irvine, CA 92615

Distribution: White Office, Canyon/Owens/Peris/Ort, Pink/Soodans
Munich
(951) 461-8834
33740 Sky Canyon Dr
Munich, CA 92542

Riverside
(951) 336-0655
3866 Colony Circle Dr
Riverside, CA 92502

ENTERED
6-15-06
Jmontez



Certified Unified Program Agency
County of Riverside Community Health Agency
Department of Environmental Health Hazardous Materials Management Division
Hazardous Materials Handler Inspection Report

PM

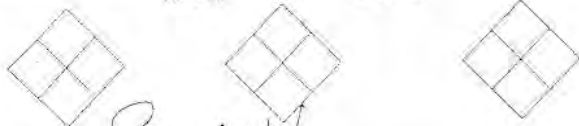
Facility Name: National RV Date: April 3, 2006
 Address: 3411 North Penno Blvd Inspection: Routine Reinspection
 City: Perris Zip Code: 92571 Level: _____ Facility #: 89073 82241
 Contact Person: _____ Number of Employees: _____ Telephone: (921) 943-6007

Riverside County Ordinance 651 California Code of Regulations Title 19 Health & Safety Code Chapter 6.95 California Fire Code

Item marked "No" are violations of the above-referenced codes and must be corrected as follows:

Y	N	N/A	Item	Notes
X			100. Current Permit	Information on Contacts is out of DATE
			101. Hazardous Materials Business Emergency Plan	and Requires updating
			A. Approved Plan on Site and Available for Review	
X			B. Plan Updated within Past 3 Years	Need to RETURN to confirm employee training
			102. Chemical Inventory Disclosure	Remains Need to work on employees
X			A. Chemical Inventory Complete	Regarding Non-Labelled containers
<			B. Inventory Updated Annually	Several containers were discovered with
			103. Emergency Response Plans and Procedures	out labeling as to contents
			A. Prevention, Mitigation and Abatement Measures	
	X		B. Documented Employee Training	NFPA 704 signs have been posted but
>			C. Evacuation Plan with Routes	not covering ALL entry points. All signs
<			D. Facility Map with Location of Chemicals	are to be visible when approaching
X			E. MSDS Available	Storage Areas.
			104. Posting	
X			A. NFPA 704 Sign(s) Posted	Need to post sign indicating what materials
<			B. Emergency Phone Numbers Posted	are being stored. Some areas are currently
X			C. Hazardous Material's Storage Area Posted	posted
X			D. Emergency Equipment Posted	
	X		E. Pesticide Storage Area Posted	Containers storing hazardous materials and
			105. Storage	waste were stored close open. All containers
X			A. Maintained to Minimize the Possibility of Release	with flammable materials are to be stored
X			B. Handling Areas Secured	closed
X			C. Incompatibles Stored Separately	
X			D. Containers Properly Labeled	
			106. Other	

NFPA 704 SIGNS



Specialist: PAC MITCHELL

The above noted violations shall be corrected within 30 days.

Received by: *Thomas Leo*

Print Name: Thomas Leo

Title: Env. Engineer

Riverside Office (909) 358-5055
 P.O. Box 7489
 Riverside, CA 92513-7489

Indio Office (760) 863-8975
 47-923 Oasis Street, Rm. E-4
 Indio, CA 92201

ENTERED
 6-21-06
Tom Mitchell

Hemet Office (909) 766-6524
 800 S. Sanderson Avenue
 Hemet, CA 92545



**Certified Unified Program Agency
Department of Environmental Health
Hazardous Materials Management Division
Hazardous Waste Generator Report Form**

1/2

Page 1 of 1

Facility Name: National RU Date: April 3, 2006
 Address: 3411 NORTH Perris Blvd Inspection Routine: Re-inspection
 City: Perris Zip Code: _____ Facility #: 822041
 Contact Person: _____ Number of Employees: 700 Telephone: (951) 943-6007

Health & Safety Code, Chapter 5.5

California Code of Regulations, Title 22
C=Compliance, Viol. Type=Violation Type, N/A= Non-Applicable

Riverside County Code, Title 8.60 (Ordinance 815.3)

Hazardous Waste Storage	Yes	No	Viol. Type	N/A	General Hazardous Waste Requirements	C	Yes	No	Viol. Type	N/A
200. H&SC 225195 Access for inspection	<input checked="" type="checkbox"/>				225. Riverside County Code, Title 8.60 - Ord. 815.3 Hazardous Waste Generator Permit Fees		<input checked="" type="checkbox"/>			
201. 22 CCR 66262.31 Maintained and Operated to Minimize the Possibility of Fire, Explosion, or Release	<input checked="" type="checkbox"/>				226. 22CCR 66262.12 (a) EPA ID Number CA _____		<input checked="" type="checkbox"/>			
202. 22 CCR 66262.34 Accumulation Time	<input checked="" type="checkbox"/>				227. 22CCR 66262.11 Hazardous Waste Determination		<input checked="" type="checkbox"/>			
203. 22 CCR 66262.34 (e) Satellite Accumulation				<input checked="" type="checkbox"/>	228. H&SC 25189.5(a) Disposed Treated at an Authorized Location		<input checked="" type="checkbox"/>			
204. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.177 Separation of Incompatible Materials	<input checked="" type="checkbox"/>				229. H&SC 25201 (a), 22CCR 66270.1 Treatment/Storage/Transfer/Disposal Permit		<input checked="" type="checkbox"/>			
Containers										
205. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.172 Compatibility of Waste with Container	<input checked="" type="checkbox"/>				230. H&SC 25143.10 Recycling Plan Complete and Reported					<input checked="" type="checkbox"/>
206. 22CCR 66262.34 (d) (2), 66262.34 (a) (2), 66262.34 (f) Container Marking and Labeling	<input checked="" type="checkbox"/>				231. H&SC 25143.2 Excluded Recyclable Materials					<input checked="" type="checkbox"/>
Records Review										
207. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.174 Weekly Inspections	<input checked="" type="checkbox"/>				232. H&SC 25160.2, 22CCR 66262.20-66262.23 General Manifesting Requirements		<input checked="" type="checkbox"/>			
208. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.171 Container Condition	<input checked="" type="checkbox"/>				233. 22CCR 66262.42 Manifesting Exception Reports			<input checked="" type="checkbox"/>		
209. 22CCR 66262.173 (b) Containers Not Leaking	<input checked="" type="checkbox"/>				234. 22CCR 66262.16, 66262.34 (a) (3) Personnel Training & Training Documents Maintained & Available		<input checked="" type="checkbox"/>			
210. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.173 (a) Management of Containers (Stored Closed)		<input checked="" type="checkbox"/>			235. 22CCR 66268.7 Waste Analysis		<input checked="" type="checkbox"/>			
211. 22CCR 66265.176, 66262.34 (a) (1) Ignitable or Reactive Wastes Stored At Least 50 ft From Property Line				<input checked="" type="checkbox"/>	236. 22CCR 67100.1-67100.11 Hazardous Waste Source Reduction & Management Review (Waste Minimization)					<input checked="" type="checkbox"/>
212. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.35 Aisle Space	<input checked="" type="checkbox"/>				237. 22CCR 66262.41 Biennial Reports					<input checked="" type="checkbox"/>
Aboveground Hazardous Waste Tank Systems										
213. 22CCR 66265.193 Containment of and Detection of Leaks				<input checked="" type="checkbox"/>	238. H&SC 25163 (a), 22CCR 66262.10 Use of a Registered Transporter of hazardous Waste		<input checked="" type="checkbox"/>			
214. 22CCR 66265.194 Aboveground Tanks Holding Hazardous Waste Operating Requirements				<input checked="" type="checkbox"/>	Management of Used Oil, Oil Filters, & Batteries					
215. 22CCR 66265.195 Inspection of Aboveground Tanks Containing Hazardous Waste				<input checked="" type="checkbox"/>	239. H&SC 25250.4 Used Oil Managed Properly		<input checked="" type="checkbox"/>			
216. 22CCR 66265.195 Leaks, Spills, or Unit AST's				<input checked="" type="checkbox"/>	240. H&SC 25160.2 Used Oil Shipment Record Keeping		<input checked="" type="checkbox"/>			
217. H&SC 25270.5(c) Spill Prevention Control and Countermeasure Plan Complete (Referral to RWQCB if No Plan)				<input checked="" type="checkbox"/>	241. H&SC 25250.7 Used Oil Not Contaminated with Hazardous Waste		<input checked="" type="checkbox"/>			
Preparedness, Prevention and Contingency Planning										
218. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.32 Required Fire, Spill, & Decontamination Equipment	<input checked="" type="checkbox"/>				242. 22CCR 66265.130 Used Oil Filters					<input checked="" type="checkbox"/>
219. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.33 Testing and Maintenance Fire, Spill, & Decontamination of Equipment	<input checked="" type="checkbox"/>				243. 22CCR 66266.81 Batteries Properly Managed		<input checked="" type="checkbox"/>			
Universal Waste										
220. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.34 Access to Communications or Alarms	<input checked="" type="checkbox"/>				244. 40 CFR 273, 22 CCR 66273 Universal Waste Fluorescent tubes, batteries, and mercury switches		<input checked="" type="checkbox"/>			
Specific Materials										
221. 22CCR 66262.34 (c) Evacuation Plan	<input checked="" type="checkbox"/>				245. H&SC 25144.5 Contaminated Rags		<input checked="" type="checkbox"/>			
222. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.37, 66265.36, 66265.52 (f), 66265.55 Arrangements with Local Authorities	<input checked="" type="checkbox"/>				245. H&SC 25143.12, 40 CFR 261 Silver Only Waste					<input checked="" type="checkbox"/>
223. 22CCR 66262.34 (d) Emergency Coordinator Listed	<input checked="" type="checkbox"/>				247. Other					
224. 66262.34 (a) (3), 66265.52 Emergency Response Procedures	<input checked="" type="checkbox"/>									

See Attachments supplemental report.

The above mentioned violations shall be corrected within 30 days

Specialist: Paul Anderson

Received By: [Signature]
Print Name: TRIP

Title: _____

DEH/HEH-023/Rev 7/2002
Offices:
InCS
(760) 533-4676
47521 Davis Rd RM124
Indio, CA 92201

Home:
(909) 796-6224
303 S. Sanderson Ave.
Hemlock, CA 92545

Distribution: Write/Office, Carry/Owner/Operator, Pick/Specialist
Murietta
(909) 461-4834
38740 Skyway Dr.
Murietta, CA 92563
Riverside
(909) 258-2997
4000 County Center C
Riverside, CA 92503

ENTERED
6-15-06
Anderson



SUPPLEMENTAL REPORT

Reference Date April 3 2006

Name National RV

Address 3411 North Paris Blvd. @ 100 Sinclair St., Perris

Re: Routine Inspection Facility # _____

Remarks:
1. Training As agreed to in the AEO has been completed.

Hazardous Waste Reports

1. Hazardous Waste containers are to be stored closed/sealed. Several containers of hazardous waste were not sealed or stored closed.

2. Hazardous Waste manifest were discovered that did not have the TSD copy attached for period exceeding 30 days. The DTSC exception report is to be filed after not receiving the TSD copy signed within 30 days of shipment.

Specialist Paul Mitchell

Received By [Signature]



COUNTY OF RIVERSIDE • COMMUNITY HEALTH AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH

March 7, 2005

CERTIFIED MAIL: 7004 2510 0000 5556 8310

National RV
100 W. Sinclair
Perris, CA 92571

On November 17, 2004, Hazardous Materials Management Division (HMMD) staff conducted an inspection at 100 W. Sinclair, Perris, CA. Based on information from the inspection, the HMMD is preparing to bring an administrative action against National RV for violations of the California Health and Safety Code and the California Code of Regulations. The California Health and Safety Code, section 25404.1.1 authorizes the Department to order action necessary to correct the violations and to assess civil penalties.

Prior to the Enforcement Order being served, the Department would like to afford you the opportunity for discussion of the violations, the compliance and the subject of a preorder negotiated penalty settlement. If you are willing to discuss this matter with the Department, an office hearing has been scheduled on March 29, 2005 at 10:30am at the County of Riverside, Department of Environmental Health, 4065 County Circle Dr., Riverside, Room 104. If I have not heard from you by March 21, 2005, I will proceed accordingly. You may contact me at (909) 358-5055.

Thank you,

Michael Shetler
Supervising Hazardous Materials Management Specialist
Hazardous Materials Management Division



**Certified Unified Program Agency
Department of Environmental Health
Hazardous Materials Management Division
Hazardous Waste Generator Report Form**

Facility Name: National RV Date: 4/21/05
 Address: 100 W. Sinclair Inspection Routine Re-inspection
 City: Perris Zip Code: 92571 Facility #: 89073
 Contact Person: Jan Morgan Number of Employees: 300 Telephone: 943-6007

Health & Safety Code, Chapter 6.5

California Code of Regulations, Title 22
 C=Compliance, V=Viol. Type=Violation Type, N/A= Non-Applicable

Riverside County Code, Title 8.60 (Ordinance 615.3)

Hazardous Waste Storage	C		V		General Hazardous Waste Requirements	C		V		N/A
	Yes	No	Yes	No		Yes	No	Yes	No	
100. H&SC 225195 Access for Inspection	✓				225. Riverside County Code Title 8.60 (Ord. 615.3) Hazardous Waste Generator Permit Fees			✓		
201. 22CCR 66262.31 Maintained and Operated to Minimize the Possibility of Fire, Explosion, or Release			✓		226. 22CCR 66262.12 (a) EPA ID Number CA <u>8L000219327</u>			✓		
202. 22CCR 66262.34 Accumulation Time			✓		227. 22CCR 66262.11 Hazardous Waste Determination			✓		
203. 22CCR 66262.34 (e) Satellite Accumulation					228. H&SC 25189.5(a) Disposed/Treated at an Authorized Location			✓		
204. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.177 Separation of Incompatible Materials	✓				229. H&SC 25201 (a), 22CCR 66270.1 Treatment/Storage/Transfer/Disposal Permit					✓
Containers					230. H&SC 25143.10 Recycling Plan Complete and Reported					✓
205. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.172 Compatibility of Waste with Container	✓				231. H&SC 25143.2 Excluded Recyclable Materials					✓
206. 22CCR 66262.34 (d) (2), 66262.34 (a) (2), 66262.34 (f) Container Marking and Labeling			✓		Records Review					
207. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.174 Weekly Inspections			✓		232. H&SC 25160.2, 22CCR 66262.20-66262.23 General Manifesting Requirements			✓		
208. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.171 Container Condition			✓		233. 22CCR 66262.42 Manifesting Exception Reports			✓		
209. 22CCR 66262.173 (b) Containers Not Leaking			✓		234. 22CCR 66262.16, 66262.34 (a) (3) Personnel Training & Training Documents Maintained & Available			✓		
210. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.173 (a) Management of Containers (Storage Closed)			✓		235. 22CCR 66268.7 Waste Analysis			✓		
211. 22CCR 66265.176, 66262.34 (a) (1) Ignitable or Reactive Wastes Stored At Least 50 ft From Property Line	✓				236. 22CCR 67100.1-67103.11 Hazardous Waste Source Reduction & Management Review (Waste Minimization)					✓
212. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.15 Aisle Space	✓				237. 22CCR 66262.41 Biennial Reports					✓
Aboveground Hazardous Waste Tank Systems					Transportation					
213. 22CCR 66265.193 Containment and Detection of Leaks					238. H&SC 25163 (a), 22CCR 66262.19 Use of a Registered Transporter of Hazardous Waste			✓		
214. 22CCR 66265.194 Aboveground Tanks Holding Hazardous Waste Operating Requirements					Management of Used Oil, Oil Filters, & Batteries					
215. 22CCR 66265.195 Inspection of Aboveground Tanks Containing Hazardous Waste					239. H&SC 25250.4 Used Oil Managed Properly				✓	
216. 22CCR 66265.196 Leaks, Spills, or Unfit AST's					240. H&SC 25160.2 Used Oil Shipment Record Keeping			✓		
217. H&SC 25270.5(c) Spill Prevention Control and Counter-measure Plan Complete (Referral to RWQCB if No Plan)					241. H&SC 25250.7 Used Oil Not Contaminated With Hazardous Waste			✓		
Preparedness, Prevention and Contingency Planning					242. 22CCR 66266.110 Used Oil Filters			✓		
218. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.32 Required Fire, Spill, & Decontamination Equipment	✓				243. 22CCR 66266.61 Batteries Properly Managed			✓		
219. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.33 Testing and Maintenance Fire, Spill, & Decontamination of Equipment	✓				Universal Waste					
220. 22CCR 66262.34 (d) (2), 66262.34 (e) (3), 66265.34 Access to Communications or Alarms	✓				244. 40 CFR 273, 22CCR 66273 Universal Waste Fluorescent tubes, batteries, and mercury switches					✓
221. 22CCR 66262.34 (d) Evacuation Plan	✓				Specific Material					
222. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.37, 66265.56, 66265.52 (f), 66265.55 Arrangements with Local Authorities	✓				245. H&SC 25144.6 Contaminated Rags					✓
223. 22CCR 66262.34 (c) Emergency Coordinator Listed			✓		246. H&SC 25143.13, 40 CFR 261 Silver Only Waste					✓
224. 66262.34 (a) (3), 66265.52 Emergency Response Procedures			✓		247. Other:					

Photographic Report will follow at a later day

The above mentioned violations shall be corrected within 15 days

Specialist: Pich Guenard

Received By: Jan Morgan
 Print Name: Jan Morgan

Title: FACILITY MANAGER

DEPER-HQ Rev 7/2002

Offices:

Inco
 (960) 692-8878
 17-963 Jasse Rd. San Joaquin, CA 95201

Perris
 (909) 752-6554
 300 S. Sinclair Ave. Perris, CA 92545

Distribution: Waste-Offices, County Geologist/Inspector, PIR- Specialist
 Murietta
 (909) 451-6874
 3374L Skyway Circle Dr. Murietta, CA 92581
 Riverside
 (909) 358-5055
 4085 County Circle Dr. Riverside, CA 92503



SUPPLEMENTAL REPORT

Reference Date 4/21/05
Name National RV
Address 100 W. Sinclair Perris 92571
Re: Generator Inspection Facility # 89073

Remarks:

- 210
201. Containers with hazardous waste not stored closed. Drums located near paint booth area. Containers not maintained to prevent the possibility of spill or release. (photo Report)
- 202, 206 Various containers which contain hazardous waste not properly labeled as a hazardous waste. Accumulation time requirements not met in result of improper labeling. (See Photo Report.)
- Business Emergency Plan received during write-up via electronic copy. Items 223, 224 corrected
- 232, 233 Waste manifests file not complete. TSD signed copy must be filed together with the generator copy. Generator shall insure they receive the TSD signed copy for all manifests relating to this facility. Manifest files must contain copies of most recent shipments.
235. Waste analysis not documented or available for review for paint booth filters.
236. Waste Oil from oil filter crusher not properly maintained in a proper container and not labeled properly.
- 234 Employee trainings related to proper hazardous waste practices not apparent. Improve training program to mitigate current violations.

Specialist Rich Guerrero

Received By Jim Morgan Facility Manager

Summary of the above inspection:

- I) I was informed that the paint filters are allowed to be dried then placed into the trash based on some testing. As the Division did not have any involvement in this decision a request for all documentation related to this practice is to be supplied. Flammable paints as they dry are generating a small quantities of heat which has caused fires at other facilities.

Hazardous Waste Program inspection:

- I) As shown in several of the photographs I documented that the employees are placing normal trash into the hazardous waste temporary containers. Hazardous waste containers are to be used for only hazardous waste. More training of the employees related to which material is to be disposed of as hazardous and which can go into the normal trash is required. A prior event is a very good case for basing this requirement as hazardous waste made its way to C R & R MERF facility.
- II) Hazardous Waste is to be contained in properly labeled containers. As documented above it was discovered that Hazardous Waste labels were applied to the containers but not filled out to meet the minimum requirements. This violation was noted in the prior inspection.
- III) Hazardous Waste manifests are to have their completed copy from the treatment and disposal facility on file within 90 days of generation. An inspection of the on site manifests discovered that manifest from January 4, 2005 did not have the facility copy filed. It is the generators responsibility to insure the treatment and disposal facility has received the hazardous waste and within 90 days the confirmation copy is received.
- IV) Batteries when recharging sometime release Sulfuric Acid onto the battery and ground. As seen in the photograph an area of spillage has been identified. The area requires work to insure that it is neutral in pH (6.5 - 7.5) so workers do not have exposure to an acidic surface.
- V) When crushing waste oil filters it is acceptable to collect the waste oil leaking from the crushed filters. When completed the waste oil is to be transferred to the waste oil storage container. As shown above this has not been done.

Business Emergency Plan inspection:

- I) Chemical storage is to be in properly labeled containers. This facility has numerous employees and chemicals storage in a wide variety of containers. Many containers did not have labels indicating the contained solution and guessing what was contained is this best means of identification except for detecting the chemical odor which is not a recommended practice.
- II) NFPA signs were in some locations and missing from other locations as shown in the photographs. NFPA 704 signs are to be in all areas where chemicals are stored in quantities that meet or exceed the state and federal standards. The entrance to building that have the chemical storage are also to have the NFPA signs for those chemicals beyond the door way.
- III) Open containers are common place when transferring materials. When the transfer is completed the container is to be sealed. When no employee is in the area the Division considers that the transferring of the chemical has taken place and all containers are to be sealed. The containers used to soak equipment as part of maintenance are to be closed when the equipment is not soaking. If possible the lid is to be closed when soaking the equipment.
- IV) Placing of a battery onto the ground and leaving it is not an acceptable practice. When working with batteries the Division is looking to see prevention of spills is part of the overall process. The battery

under the RV was left by an employee who was not working in the area at the time of this inspection thus creating a situation where another employee could easily not know the battery was abandoned.

Over All Training:

The biggest item is the failure of the training program to reduce the items seen during this inspection. Records for training of new employees are available and the program for new employees has been in existence for years. I have in the past noted the lack of yearly training or its effectiveness. The lack of labels, incorrect labeling, misuse of bins assigned to specific waste types, food containers in the work area and the leaving of containers open when not being used demonstrates the need for more training. Past history has indicated this can be done and in recent years is lacking. Training is an on going issue and can be conducted in daily, weekly or monthly safety meetings in the various sections within National RV.

Note not all of the violations were photographed for this inspection.



Certified Unified Program Agency
County of Riverside Community Health Agency
Department of Environmental Health
Hazardous Materials Management Division

W

Page ___ of ___ pages

SUPPLEMENTAL REPORT

Reference Date March 22 2005

Name National R.V.

Address 3411 North Perris Blvd. & 100 Sinclair St., Perris

Re: Follow up inspection

Facility # _____

Remarks:

I Attempted to inspect both facilities prior to AEO Hearing

To see if they have corrected the items in question or have made

corrections to make. Mr Fred Royball indicated that no one was

available to walk the facilities as they were in training in Palm Springs.

I had received a call from Mr Fred Royball earlier requesting an
inspection.

This is consider refusal for inspection

Specialist

Pasc Mitchell

Received By _____



**Certified Unified Program Agency
Department of Environmental Health
Hazardous Materials Management Division
Hazardous Waste Generator Report Form**

Facility Name: National RV Date: 4/21/05
 Address: 3411 N. Perris Blvd Inspection Routine: Re-inspection
 City: Perris Zip Code: 92571 Facility #: 82241
 Contact Person: Jon Morgan Number of Employees: 1,000 Telephone: 943-6002

Health & Safety Code, Chapter 6.5 California Code of Regulations, Title 22 Riverside County Code, Title 8.58 (Ordinance 615.3)
 C=Compliance, Viol. Type=Violation Type, N/A= Non-Applicable

Hazardous Waste Storage	C		Viol Type	N/A	General hazardous Waste Requirements	C		Viol Type	N/A
	Yes	No				Yes	No		
200. H&SC 225195 Access for inspection	<input checked="" type="checkbox"/>				225. Riverside County Code Title 8.58 (Ord. 615.3) Hazardous Waste Generator Permit Fees	<input checked="" type="checkbox"/>			
201. 22CCR 66262.34 Maintained and Operated to Minimize the Possibility of Fire, Explosion, or Release		<input checked="" type="checkbox"/>			225. 22CCR 66262.12 (a) EPA ID Number CA <u>D981993454</u>	<input checked="" type="checkbox"/>			
202. 22CCR 66262.34 Accumulation Time		<input checked="" type="checkbox"/>			227. 22CCR 66262.11 Hazardous Waste Determination	<input checked="" type="checkbox"/>			
203. 22CCR 66262.34 (e) Satellite Accumulation				<input checked="" type="checkbox"/>	228. H&SC 25189.5(a) Disposed/Treated at an Authorized Location	<input checked="" type="checkbox"/>			
204. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.177 Separation of Incompatible Materials	<input checked="" type="checkbox"/>				229. H&SC 25201 (a), 22CCR 66270.1 Treatment/Storage/Transfer/Disposal Permit				<input checked="" type="checkbox"/>
Containers					230. H&SC 25143.10 Recycling Plan Complete and Reported				<input checked="" type="checkbox"/>
205. 22CCR 66262.34 (c) (2), 66262.34 (a) (1), 66265.172 Compatibility of Waste with Container	<input checked="" type="checkbox"/>				231. H&SC 25143.2 Excluded Recyclable Materials				<input checked="" type="checkbox"/>
206. 22CCR 66262.34 (d) (2), 66262.34 (a) (2), 66262.34 (1) Container Marking and Labeling		<input checked="" type="checkbox"/>			Records Review				
207. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.174 Weekly Inspections		<input checked="" type="checkbox"/>			232. H&SC 25160.2, 22CCR 66262.20-66262.23 General Manifesting Requirements		<input checked="" type="checkbox"/>		
208. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.171 Container Condition	<input checked="" type="checkbox"/>				233. 22CCR 66262.42 Manifesting Exception Reports		<input checked="" type="checkbox"/>		
209. 22CCR 66262.173 (b) Containers Not Leaking	<input checked="" type="checkbox"/>				234. 22CCR 66262.16, 66262.34 (a) (3) Personnel Training & Training Documents Maintained & Available		<input checked="" type="checkbox"/>		
210. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.173 (a) Management of Containers (Stored Closed)		<input checked="" type="checkbox"/>			235. 22CCR 66260.7 Waste Analysis		<input checked="" type="checkbox"/>		
211. 22CCR 66265.176, 66262.34 (a) (1) Ignitable or Reactive Wastes Stored At Least 50 ft From Property Line	<input checked="" type="checkbox"/>				236. 22CCR 67100.1-67100.11 Hazardous Waste Source Reduction & Management Review (Waste Minimization)				<input checked="" type="checkbox"/>
212. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.35 Aisle Space	<input checked="" type="checkbox"/>				237. 22CCR 66262.41 Biennial Reports				<input checked="" type="checkbox"/>
Aboveground Hazardous Waste Tank Systems					Transportation				
213. 22CCR 66265.193 Containment of and Detection of Leaks					238. H&SC 25163 (a), 22CCR 66262.10 Use of a Registered Transporter of Hazardous Waste		<input checked="" type="checkbox"/>		
214. 22CCR 66265.194 Aboveground Tanks Holding Hazardous Waste Operating Requirements					Management of Used Oil, Oil Filters & Batteries				
215. 22CCR 66265.195 Inspection of Aboveground Tanks Containing Hazardous Waste					239. H&SC 25290.4 Used Oil Managed Properly		<input checked="" type="checkbox"/>		
216. 22CCR 66265.196 Leaks, Spills, or Upset AST's					240. H&SC 25160.2 Used Oil Shipment Record Keeping		<input checked="" type="checkbox"/>		
217. H&SC 25270.5(c) Spill Prevention Control and Counter-measure Plan Complete (Referral to RWQCB if No Plan)					241. H&SC 25290.7 Used Oil Not Contaminated with Hazardous Waste		<input checked="" type="checkbox"/>		
Preparedness, Prevention and Contingency Planning					242. 22CCR 66266.130 Used Oil Filters		<input checked="" type="checkbox"/>		
218. 22CCR 66262.34 (d) (2), 66262.34 (a) (4), 66265.32 Required Fire, Spill, & Decontamination Equipment	<input checked="" type="checkbox"/>				243. 22CCR 66266.81 Batteries Properly Managed		<input checked="" type="checkbox"/>		
219. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.33 Testing and Maintenance Fire, Spill, & Decontamination of Equipment	<input checked="" type="checkbox"/>				Universal Waste				
220. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.34 Access to Communications or Alarms	<input checked="" type="checkbox"/>				244. 40 CFR 273, 22CCR 66273 Universal Waste Fluorescent tubes, batteries, and mercury switches				<input checked="" type="checkbox"/>
221. 22CCR 66262.34 (d) Evacuation Plan	<input checked="" type="checkbox"/>				Specific Materials				
222. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.36, 66265.32 (1), 66265.35 Arrangements with Local Authorities	<input checked="" type="checkbox"/>				245. H&SC 25144.6 Contaminated Rags				<input checked="" type="checkbox"/>
223. 22CCR 66262.34 (c) Emergency Coordinator Listed		<input checked="" type="checkbox"/>			246. H&SC 25143.13, 40 CFR 261 Silver Only Waste				<input checked="" type="checkbox"/>
224. 66262.34 (a) (3), 66265.32 Emergency Response Procedures		<input checked="" type="checkbox"/>			247. Other:				

The above mentioned violations shall be corrected within 5 days

Specialist: Rich Guerrero Received By: Jon Morgan Title: Permitting Specialist

San Bernardino County Health Department
 47-914 Gas & No. Rm. E4
 Indio, CA 92201
 (760) 663-6075

Hemlock
 600 S. Sherman Ave.
 Hemlock, GA 92545
 (909) 798-8524

Riverside County Health Department
 38740 Sky Canyon Ct.
 Mt. View, CA 92561
 (909) 461-2834

Riverside County Health Department
 4355 County Center
 Riverside, CA 92521
 (909) 252-6059



W

SUPPLEMENTAL REPORT

Reference Date 4/21/05
Name National RV
Address 3411 N Perris Blvd Perris 92571
Re: Generator Inspection Facility # 82241

Remarks:

- 202, 210 Hazardous waste ~~toilet~~ containers in various locations not kept closed when not in use. Container not maintained to prevent the possibility of spill or release. (photo Report)
- 202, 206, 207 Various hazardous waste containers were not properly labeled, resulting in an unknown accumulation start date. Weekly inspections not performed to correct these problems.
- * Business Emergency Plan received during report write-up via electronic copy. Items 223 & 224 corrected.
- 232, 233 TSDP signed copies of hazardous waste manifests not found for three manifests. All copies of manifests must be kept together and filed for easy review.
- 234 Employee trainings related to hazardous waste practices not apparent. Improve training program to mitigate current violations.
- 235. Provide documentation of analytical for paint booth filters.
- 236 Used oil from oil filter crusher not properly maintained in a labeled container.

Specialist Pich Geron

Received By Jim Major Facility Mgr.
white-specialist, yellow-operator, pink-file



Certified Unified Program Agency
County of Riverside Community Health Agency
Department of Environmental Health
Hazardous Materials Management Division

Page ___ of ___ pages

SUPPLEMENTAL REPORT

Reference Date April 25, 2005

Name National RV

Address 3411 ~~East~~ North Percis & 100 West Sinclair, Percis

Re: _____ Facility # _____

Remarks:

- Hazardous Waste Manifest have been updated to within 30 days.

Specialist Paul Mitchell

Received By 



County of Riverside Health Services Agency
 Department of Environmental Health
 Hazardous Materials Management Division
Business Emergency Plan Inspection Report

01 1995
 SA FIA

Facility Name: National R.V. Inc Date: April 26, 95
 Address: 3411 N. Perris Inspection: Routine Follow-Up
 City: Perris Zip Code: _____ Facility #: _____
 Contact Person: _____ Telephone: _____

Riverside County Ordinance 651 California Code of Regulations TITLE 19 Health & Safety Code Chapter 6.95

Items marked "No" are violations of the above referenced codes and must be corrected as follows:

Yes	No	N/A	Items marked "No" are violations of the above referenced codes and must be corrected as follows:
			I. Permit
<input checked="" type="checkbox"/>			A. Current Permit <i>Need to employes with written records</i>
			II. Business Emergency Plan
<input checked="" type="checkbox"/>			A. Approved Plan on Site and Available for Review <i>Minimize Possibility of Release see</i>
<input checked="" type="checkbox"/>			B. Plan Updated Within Last 2 Years <i>Waste Generator Report</i>
			III. Chemical Inventory Disclosure
<input checked="" type="checkbox"/>			A. Chemical Inventory Complete <i>Need to work on the work space to</i>
<input checked="" type="checkbox"/>			B. Inventory Updated Annually <i>Maintain Easy Access or exit. (Fiberglass work area.)</i>
			IV. Emergency Response Plans and Procedures
<input checked="" type="checkbox"/>			A. Mitigation, Prevention, Abatement Measures
<input checked="" type="checkbox"/>			B. Documented Employee Training
<input checked="" type="checkbox"/>			C. Evacuation Plan with Routes
<input checked="" type="checkbox"/>			D. Facility Map showing Location of Chemicals
			V. Posting
<input checked="" type="checkbox"/>			A. Entrance and Exits Posted
<input checked="" type="checkbox"/>			B. Emergency Phone Numbers Posted
			C. Hazardous Materials Storage Area Posted
			D. Emergency Equipment Posted
		<input checked="" type="checkbox"/>	E. Pesticide Storage Area Posted
			VI. Storage
		<input checked="" type="checkbox"/>	A. Maintained to Minimize Possibility of Release
<input checked="" type="checkbox"/>			B. Handling Areas Secured
<input checked="" type="checkbox"/>			C. Incompatibles Stored Separately
<input checked="" type="checkbox"/>			D. Containers Properly Labeled

The above noted violations shall be corrected within 30 days.

Specialist: Paul Mitchell

Received by: _____
 Signature: Michael Hennah
 Print Name: Michael Hennah
 Print Title: H.R. Administrator

Riverside Office
 4055 County Circle Drive
 Riverside, CA 92503
 (909) 358-5055

Indio Office
 47923 Oasis Street, Room E4
 Indio, CA 92201
 (619) 863-8976

San Jacinto Office
 1370 S. State Street, Room 101
 San Jacinto, CA 92583
 (909) 654-3878

MONITORING SYSTEM CERTIFICATION

For Use By All Jurisdictions Within the State of California

Authority Cited: - Chapter 6.7, Health and Safety Code; Chapter 16, Division 3, Title 23, California Code of Regulations

*Mont. Cert. Expires
8/31/12-16-05
Not Notific. of Cert. Prior*

This form must be used to document testing and servicing of monitoring equipment. A separate certification or report must be prepared for each monitoring system control panel by the technician who performs the work. A copy of this form must be provided to the tank system owner/operator. The owner/operator must submit a copy of this form to the local agency regulating UST systems within 30 days of test date.

A. General Information

Facility Name: National RV Bldg. No: _____
 Site Address: 3411 N. Perris Bl. City: Perris Zip: 92571
 Facility Contact Person: John Morgan Contact Phone No.: 951.943.6007
 Make/Model of Monitoring System: Veeder Root TLS 300C Date of Testing/Serviceing: 11/4/2005

B. Inventory of Equipment Tested/Certified

Check the appropriate boxes to indicate specific equipment inspected/serviced

Tank ID: <u>01 - UNL</u>	Tank ID:
<input checked="" type="checkbox"/> In-Tank Gauging Probe Model: <u>847390-107</u>	<input type="checkbox"/> In-Tank Gauging Probe Model:
<input checked="" type="checkbox"/> Annular Space or Vault Sensor Model: <u>794390-420</u>	<input type="checkbox"/> Annular Space or Vault Sensor Model:
<input checked="" type="checkbox"/> Piping Sump / Trench Sensor(s) Model: <u>794380-208</u>	<input type="checkbox"/> Piping Sump / Trench Sensor(s) Model:
<input checked="" type="checkbox"/> Fill Sump Sensor(s) Model: <u>794380-208</u>	<input type="checkbox"/> Fill Sump Sensor(s) Model:
<input type="checkbox"/> Mechanical Line Leak Detector Model:	<input type="checkbox"/> Mechanical Line Leak Detector Model:
<input type="checkbox"/> Electronic Line Leak Detector Model:	<input type="checkbox"/> Electronic Line Leak Detector Model:
<input type="checkbox"/> Tank Overfill / High-Level Sensor Model:	<input type="checkbox"/> Tank Overfill / High-Level Sensor Model:
<input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2).	<input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2).
Tank ID:	Tank ID:
<input type="checkbox"/> In-Tank Gauging Probe Model:	<input type="checkbox"/> In-Tank Gauging Probe Model:
<input type="checkbox"/> Annular Space or Vault Sensor Model:	<input type="checkbox"/> Annular Space or Vault Sensor Model:
<input type="checkbox"/> Piping Sump / Trench Sensor(s) Model:	<input type="checkbox"/> Piping Sump / Trench Sensor(s) Model:
<input type="checkbox"/> Fill Sump Sensor(s) Model:	<input type="checkbox"/> Fill Sump Sensor(s) Model:
<input type="checkbox"/> Mechanical Line Leak Detector Model:	<input type="checkbox"/> Mechanical Line Leak Detector Model:
<input type="checkbox"/> Electronic Line Leak Detector Model:	<input type="checkbox"/> Electronic Line Leak Detector Model:
<input type="checkbox"/> Tank Overfill / High-Level Sensor Model:	<input type="checkbox"/> Tank Overfill / High-Level Sensor Model:
<input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2).	<input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2).
Dispenser ID: <u>1</u>	Dispenser ID:
<input checked="" type="checkbox"/> Dispenser Containment Sensor(s) Model: <u>794380-212</u>	<input type="checkbox"/> Dispenser Containment Sensor(s) Model:
<input checked="" type="checkbox"/> Shear Valve(s).	<input type="checkbox"/> Shear Valve(s).
<input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).	<input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).
Dispenser ID: <u>3</u>	Dispenser ID:
<input type="checkbox"/> Dispenser Containment Sensor(s) Model: <u>794380-208</u>	<input type="checkbox"/> Dispenser Containment Sensor(s) Model:
<input type="checkbox"/> Shear Valve(s).	<input type="checkbox"/> Shear Valve(s).
<input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).	<input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).
Dispenser ID:	Dispenser ID:
<input type="checkbox"/> Dispenser Containment Sensor(s) Model:	<input type="checkbox"/> Dispenser Containment Sensor(s) Model:
<input type="checkbox"/> Shear Valve(s).	<input type="checkbox"/> Shear Valve(s).
<input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).	<input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).

If the facility contains more tanks or dispensers, copy this form. Include information for every tank and dispenser at the facility.

C. Certification I certify that the equipment identified in this document was inspected/serviced in accordance with the manufacturers' guidelines. Attached to this Certification is information (e.g. manufacturers' checklists) necessary to verify that this information is correct and a Plot Plan showing the layout of monitoring equipment. For any equipment capable of generating such reports, I have also attached a copy of the report; (check all that apply): System Setup Alarm History Report

Technician Name(print): Brian Halfwassen Signature: _____
 Certification No: _____ License No: 1606 561275
 Testing Company Name: Pacific Systems Electric Phone No: 951.677.0704
 Company Address: 38330 Via La Paloma, CA 92563 Date of Testing/Serviceing: 11/4/2005

Monitoring System Certification

D. Results of Testing/Serviceing

Complete the following checklist:

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Has all input wiring been inspected for proper entry and termination, including testing for ground faults?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Were all tank gauging probes visually inspected for damage and residue buildup?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Was accuracy of system product level readings tested?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Was accuracy of system water level readings tested?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Were all probes reinstalled properly?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Were all items on the equipment manufacturer's maintenance checklist completed?

* In the Section H, below, describe how and when these deficiencies were or will be corrected.

G. Line Leak Detectors (LLD):

Check this box if LLDs are not installed

Complete the following checklist:

<input type="checkbox"/> Yes	<input type="checkbox"/> No*	For equipment start-up or annual equipment certification, was a leak simulated to verify LLD performance?
	<input checked="" type="checkbox"/> N/A	(Check all that apply) Simulated leak rate: <input type="checkbox"/> 3 g.p.h.; <input type="checkbox"/> 0.1 g.p.h.; <input type="checkbox"/> 0.2 g.p.h.
<input type="checkbox"/> Yes	<input type="checkbox"/> No*	Were all LLDs confirmed operational and accurate within regulatory requirements?
<input type="checkbox"/> Yes	<input type="checkbox"/> No*	Was the testing apparatus properly calibrated?
<input type="checkbox"/> Yes	<input type="checkbox"/> No*	For mechanical LLDs, does the LLD restrict product flow if it detects a leak?
	<input checked="" type="checkbox"/> N/A	
<input type="checkbox"/> Yes	<input type="checkbox"/> No*	For electronic LLDs, does the turbine automatically shut off if the LLD detects a leak?
	<input checked="" type="checkbox"/> N/A	
<input type="checkbox"/> Yes	<input type="checkbox"/> No*	For electronic LLDs, does the turbine automatically shut off if any portion of the monitoring system is disabled or disconnected?
	<input checked="" type="checkbox"/> N/A	
<input type="checkbox"/> Yes	<input type="checkbox"/> No*	For electronic LLDs, does the turbine automatically shut off if any portion of the monitoring system malfunctions or fails a test?
	<input checked="" type="checkbox"/> N/A	
<input type="checkbox"/> Yes	<input type="checkbox"/> No*	For electronic LLDs, have all accessible wiring connections been visually inspected?
	<input checked="" type="checkbox"/> N/A	
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Were all items on the equipment manufacturer's maintenance checklist completed?

* In the Section H, below, describe how and when these deficiencies were or will be corrected.

H. Comments:

Suction System



Certified Unified Program Agency
County of Riverside Community Health Agency
Department of Environmental Health Hazardous Materials Management Division
Hazardous Materials Handler Inspection Report

Facility Name: National RV Date: Nov 17 2004
 Address: 100 West Sinclair Street Inspection: Routine Reinspection
 City: Perris Zip Code: 92571 Level: _____ Facility #: 89073
 Contact Person: _____ Number of Employees: _____ Telephone: (909) 999-7260

Riverside County Ordinance 651 California Code of Regulations Title 19 Health & Safety Code Chapter 6.95 California Fire Code

Y	N	N/A	Item marked "No" are violations of the above-referenced codes and must be corrected as follows:
X			100. Current Permit
			101. Hazardous Materials Business Emergency Plan
X			A. Approved Plan on Site and Available for Review
X			B. Plan Updated within Past 3 Years
			102. Chemical Inventory Disclosure
X			A. Chemical Inventory Complete
X			B. Inventory Updated Annually
			103. Emergency Response Plans and Procedures
X			A. Prevention, Mitigation and Abatement Measures
	X		B. Documented Employee Training
X			C. Evacuation Plan with Routes
X			D. Facility Map with Location of Chemicals
X			E. MSDS Available
			104. Posting
	X		A. NFPA 704 Sign(s) Posted
X			B. Emergency Phone Numbers Posted
X			C. Hazardous Materials Storage Area Posted
X			D. Emergency Equipment Posted
		X	E. Pesticide Storage Area Posted
			105. Storage
	X		A. Maintained to Minimize the Possibility of Release
X			B. Handling Areas Secured
X			C. Incompatibles Stored Separately
	X		D. Containers Properly Labeled
			106. Other

Some containers of hazardous materials were not labeled. All containers are required to be labeled.

Open containers of flammable liquids were discovered in several areas. These need to be sealed when not transferring liquids.

From handling practices the training of employee is not effective. More training is required.

NFPA 704 signs not posted in area that exceeds the federal or state standards. These signs are required to be posted when chemicals storage exceeds the 55 gallons, 500 pounds or 200 cubic feet.

NFPA 704 SIGNS

Specialist: PAUL MITCHELL

The above noted violations shall be corrected within 30 days.

Received by: [Signature]
 Print Name: Jon Morgan
 Title: FACILITY MANAGER

Riverside Office (909) 358-5055 P.O. Box 7489 Riverside, CA 92513-7489
 Indio Office (760) 863-8976 47-923 Oasis Street, Rm. E-4 Indio, CA 92201
 Hemet Office (909) 766-6524 800 S. Sanderson Avenue Hemet, CA 92545



Certified Unified Program Agency
County of Riverside Community Health Agency
Department of Environmental Health
Hazardous Materials Management Division
Hazardous Waste Generator Report Form



Facility Name: National RV Date: Nov 17 2004
 Address: 800 West Sinclair Street Inspection Routine Re-inspection
 City: Perth Zip Code: 92571 Facility #: 89073
 Contact Person: _____ Number of Employees: _____ Telephone: (800) 999-7260

Hazardous Waste Storage	Health & Safety Code, Chapter 6.5		California Code of Regulations, Title 22		Riverside County Code, Title 8.60 (Ordinance 615.3)		C Yes	Ho	Viol Type	N/A	General Hazardous Waste Requirements		C Yes	Ho	Viol Type	N/A
	C	Ho	C	Ho	C	Ho										
200. H&SC 225195 Access for Inspection	X						X				225. Riverside County Code Title 8.60 (Ord. 615.3) Hazardous Waste Generator Permit Fees	X				
201. 22 CCR 66265.31 Maintained and Operated to Minimize the Possibility of Fire, Explosion, or Release	X						X				226. 22CCR 66262.12 (a) EPA ID Number CA	X				
202. 22 CCR 66262.34 Accumulation Time		X						X			227. 22CCR 66262.11 Hazardous Waste Determination	X				
203. 22 CCR 66262.34 (e) Satellite Accumulation					X				X		228. H&SC 25189.5(a) Disposed/Treated at an Authorized Location	X				
204. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.177 Separation of Incompatible Materials	X						X				229. H&SC 25201 (a), 22CCR 66270.1 Treatment/Storage/Transfer/Disposal Permit	X				
Containers											230. H&SC 25143.10 Recycling Plan Complete and Reported					X
205. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.172 Compatibility of Waste with Container	X						X				231. H&SC 25143.2 Excluded Recyclable Materials					X
206. 22CCR 66262.34 (d) (2), 66262.34 (a) (2), 66262.34 (f) Container Marking and Labeling		X						X			Records Review					
207. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.174 Weekly Inspections	X						X				232. H&SC 25160.2, 22CCR 66262.20-66262.23 General Manifesting Requirements	X				
208. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.171 Container Condition	X						X				233. 22CCR 66262.42 Manifesting Exception Reports	X				X
209. 22CCR 66262.173 (b) Containers Not Leaking	X						X				234. 22CCR 66262.16, 66262.34 (a) (3) Personnel Training & Training Documents Maintained & Available	X				
210. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.173 (a) Management of Containers (Stored Closed)		X						X			235. 22CCR 66268.7 Waste Analysis	X				
211. 22CCR 66265.175, 66262.34 (a) (1) Ignitable or Reactive Wastes Stored At Least 50 ft From Property Line					X				X		236. 22CCR 67100.1-67100.11 Hazardous Waste Source Reduction & Management Review (Waste Minimization)					X
212. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.35 Aisle Space	X						X				237. 22CCR 66262.41 Biennial Reports	X				
Aboveground Hazardous Waste Tank Systems											Transportation					
213. 22CCR 66265.193 Containment of and Detection of Leaks									X		238. H&SC 25163 (a), 22CCR 66262.10 Use of a Registered Transporter of Hazardous Waste	X				
214. 22CCR 66265.194 Aboveground Tanks Holding Hazardous Waste Operating Requirements									X		Management of Used Oil, Oil Filters & Batteries					
215. 22CCR 66265.195 Inspection of Aboveground Tanks Containing Hazardous Waste									X		239. H&SC 75250.4 Used Oil Managed Properly		X			
216. 22 CCR 66265.196 Leaks, Spills, or Unfit AST's									X		240. H&SC 25160.2 Used Oil Shipment Record Keeping	X				
217. H&SC 25270.5(c) Spill Prevention Control and Counter-measure Plan Complete <input type="checkbox"/> Referral to RWQCB if No Plan <input type="checkbox"/>									X		241. H&SC 25250.7 Used Oil Not Contaminated with Hazardous Waste	X				
Preparedness, Prevention and Contingency Planning	X										242. 22CCR 66266.130 Used Oil Filters					X
218. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.32 Required Fire, Spill, & Decontamination Equipment	X						X				243. 22CCR 66266.31 Batteries Properly Managed	X				
219. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.33 Testing and Maintenance Fire, Spill, & Decontamination of Equipment	X						X				Universal Waste					
220. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.34 Access to Communications or Alarms	X						X				244. 40 CFR 273, 22 CCR 66273 Universal Waste Fluorescent tubes, batteries, and mercury switches	X				
221. 22CCR 66262.34 (d) Evacuation Plan	X						X				Specific Materials					
222. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.37, 66265.56, 66265.52 (f), 66265.55 Arrangements with Local Authorities	X						X				245. H&SC 25144.6 Contaminated Rags	X				
223. 22CCR 66262.34 (d) Emergency Coordinator Listed	X						X				246. H&SC 25143.13, 40 CFR 261 Silver Only Waste					X
224. 66262.34 (a) (3), 66265.52 Emergency Response Procedures	X						X				247. Other:					

Waste Containers Not Completed - Needs to fill out labels

The above mentioned violations shall be corrected within 30 days

Specialist: Pavel Melnik Received By: Jan Morgan Title: FACILITY MANAGER
 Print Name: Jan Morgan



Certified Unified Program Agency
 County of Riverside Community Health Agency
 Department Of Environmental Health Hazardous Materials Management Division
UNDERGROUND STORAGE TANK INSPECTION REPORT
DOUBLE WALLED SYSTEM

Page 1 of 2

Facility Name	National R II	Date	Nov 15, 2004
Street Address	3411 North Penn Blvd	Facility #	82241
City	Perris	Zip Code	92571
Contact		Phone No.	(909) 322-6007
		Inspection	Routine <input checked="" type="checkbox"/> Reinspection <input type="checkbox"/>
		CMD Technician Present	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Refer to Title 23 of California Code of Regulations (CCR), Chapter 6.7 of the California Health and Safety Code (CHSC). Items marked "N/A" are violations of the Underground Storage Tank laws and regulations, and must be corrected as outlined in the inspection report. N/A is not applicable or unable to verify.

ITEM NO.	UST SYSTEM RECORDS	CODE SECTIONS	Tank 1			Tank 2			Tank 3			Tank 4		
			Y	N	N/A	Y	N	N/A	Y	N	N/A	Y	N	N/A
301	UPC Form A and B current.	25286 (a), 2712(i)	X											
302	Financial Responsibility current.	25292 2(a), 2712(i)	X											
303	Owner/Operator Agreement submitted.	2620(b), 25284(a)(3), 2712(i)	X											
304	Monitoring Plan approved.	2632(b), 2634(d), 2712(i)	X											
305	Unauthorized Release Response Plan current.	2632(d)(2), 2634(e), 2712(i)	X											
306	Permits current and retained at facility.	2712 (i), 25284(a), 2712(i)	X											
307	Continuous monitoring system certified annually.	2630(d), 2641(j)	X											
308	Secondary containment tested as required.	2637(a), 25284.1	X											
309	Releases reported/recorded.	2651, 2652, 25294	X											
310	Maintenance and monitoring records available.	2712(b)	X											

UST SYSTEM INSPECTION													
311	Alarm status is normal/Alarm history available.	2632(e), 25293	X										
312	Audible and visual alarms are functioning properly.	2632(c)(2)(B), 2636(f)(1)	X										
313	Sticker/tag affixed to monitoring equipment at certification.	2637 (b)(6)	X										
314	UST system has approved overfill protection.	2635(b)(2)	X										
315	Spill container in good condition and liquid free.	2635(b)(1)	X										
316	Spill container drain appears functional or alternative available.	2635(b)(1)(C)	X										
317	All containment sumps liquid free/good condition.	2631(d)(4), 25292.1	X										
318	Secondary containment system drained to monitored sump.	2636(c)(1), 2636(f)	X										
319	Sensors placed at low point in all sumps.	2630(d), 25299(a)(9)	X										
320	Under dispenser containment present.	2636(h)(1)	X										
321	Under dispenser containment monitored.	2636(i)(1)	X										
322	Contractor/CMD Technician trained.	2637(b)(1)(2)	X										

MONITORING OPTIONS FOR PRESSURIZED SYSTEMS													
OPTION 1													
323	Continuous audible and visual alarm or stops flow of product at dispenser.	2636 (f)(1)	X										
324	Shut down the turbine when a leak is detected.	2636 (f)(3), 2635 (g)(1)-(4)	X										
325	Turbine shuts off when monitor is disconnected or fails.	2636 (g) (1)-(4)	X										
OPTION 2													
326	Continuous audible and visual alarm or stops flow of product at dispenser.	2636 (f)(1)											
327	Shut down the turbine when a leak is detected.	2636 (f)(3)											
328	Annual pipeline integrity test detects .1gph at 150% of operating pressure.	2636 (f)(4)											
OPTION 3													
329	Continuous audible and visual alarm or stops flow of product at dispenser.	2636 (f)(1)											
330	Line leak detector detects 3.0 gph or equivalent and is certified annually.	2636 (f)(2), 2637 (b)											
331	Annual pipeline integrity test detects .1gph at 150% of operating pressure.	2636 (f)(4)											
OPTION 4 - Emergency Generators with Pressurized Piping													
332	Continuous audible and visual alarm.	2636 (f)(1)											
333	Line leak detector detects 3.0 gph or equivalent and is certified annually.	2636 (f)(2), 2637 (b)											
334	Monitoring system checked daily.	2636(g), 2636(f)(4)											
OPTION 5 - Double Wall Suction, Gravity, Remote													
335	Continuous audible and visual alarm or stops flow of product at dispenser.	2636(f)(1)											

Spill Bucket is separating from base plate and is required to be properly tight and not leaking into the fill sump

NOTICE OF VIOLATION: The violations noted above must be corrected within (30) days. Failure to comply may result in legal action.

Specialist: <i>Paul Mitchell</i>	Received: <i>John Morgan</i>	Title: <i>FACILITY MANAGER</i>
----------------------------------	------------------------------	--------------------------------

OFFICES:
 Riverside (909) 358-5055
 P.O. Box 7489
 Riverside, CA 92513-7489

Indio (760) 863-8976
 47-923 Oasis St., Rm. E-4
 Indio, CA 92201

Hemet (909) 766-6524
 500 S. Sanderson Ave., #200
 Hemet, CA 92345



**Certified Unified Program Agency
County of Riverside Community Health Agency
Department of Environmental Health
Hazardous Materials Management Division
Hazardous Waste Generator Report Form**

ENTERED

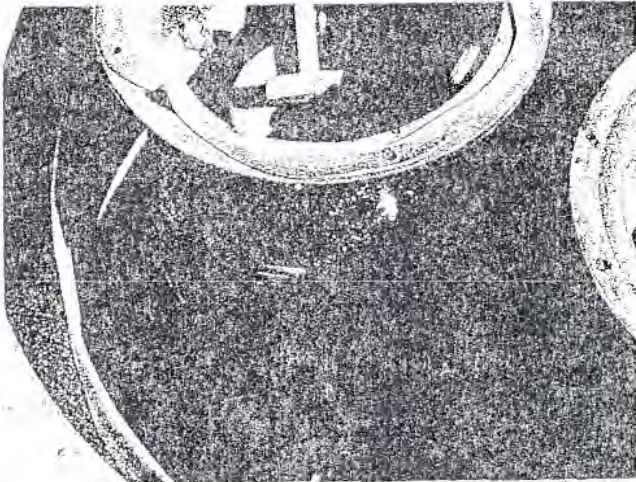
Facility Name: National RV Date: Nov 15 & 17 2004
 Address: 3411 North Pennis Blvd Inspection Routine Re-inspection
 City: Pennis Zip Code: 92571 Facility #: 82241
 Contact Person: _____ Number of Employees: _____ Telephone: (800) 322-6007

Hazardous Waste Storage	California Code of Regulations, Title 22			Riverside County Code, Title 8.60 (Ordinance 615.3)		
	C Yes No	Viol Type	NA	C Yes No	Viol Type	NA
200. H&SC 225195 Access for inspection	X			225. Riverside County Code Title 8.60 (Ord. 615.3) Hazardous Waste Generator Permit Fees	X	
201. 22 CCR 66262.31 Maintained and Operated to Minimize the Possibility of Fire, Explosion, or Release		X		226. 22CCR 66262.12 (a) EPA ID Number CA	X	
202. 22 CCR 66262.34 Accumulation Time		X		227. 22CCR 66262.11 Hazardous Waste Determination	X	
203. 22 CCR 66262.34 (e) Satellite Accumulation			X	228. H&SC 25189.5(a) Disposed Treated at an Authorized Location	X	
204. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.177 Separation of Incompatible Materials	X			229. H&SC 25201 (a), 22CCR 66270.1 Treatment/Storage/Transfer/Disposal Permit	X	
Containers				230. H&SC 25143.10 Recycling Plan Complete and Reported		X
205. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.172 Compatibility of Waste with Container	X			231. H&SC 25143.2 Excluded Recyclable Materials		X
206. 22CCR 66262.34 (d) (2), 66262.34 (a) (2), 66262.34 (f) Container Marking and Labeling		X		Records Review		
207. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.174 Weekly Inspections		X		232. H&SC 25160.2, 22CCR 66262.20-66262.23 General Manifesting Requirements	X	
208. 22CCR 66262.34 (a) (2), 66262.34 (a) (1), 66265.171 Container Condition	X			233. 22CCR 66262.42 Manifesting Exception Reports		X
209. 22CCR 66262.173 (b) Containers Not Leaking	X			234. 22CCR 66262.16, 66262.34 (a) (3) Personnel Training & Training Documents Maintained & Available	X	
210. 22CCR 66262.34 (d) (2), 66262.34 (a) (1), 66265.173 (s) Management of Containers (Stored Closed)		X		235. 22CCR 66268.7 Waste Analysis	X	
211. 22CCR 66265.176, 66262.34 (a) (1) Ignitable or Reactive Wastes Stored At Least 50 ft From Property line			X	236. 22CCR 67100.1-67100.11 Hazardous Waste Source Reduction & Management Review (Waste Minimization)		X
212. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.35 Aisle Space	X			237. 22CCR 66262.41 Biennial Reports	X	
Aboveground Hazardous Waste Tank Systems				Transportation		
213. 22CCR 66265.193 Containment of and Detection of Leaks			X	238. H&SC 25163 (a), 22CCR 66262.10 Use of a Registered Transporter of Hazardous Waste	X	
214. 22CCR 66265.194 Aboveground Tanks Holding Hazardous Waste Operating Requirements			X	Management of Used Oil, Oil Filters & Debris		
215. 22CCR 662265.195 Inspection of Aboveground Tanks Containing Hazardous Waste			X	239. H&SC 25250.4 Used Oil Managed Properly		X
216. 22 CCR 66265.196 Leaks, Spills, or Unfit AST's			X	240. H&SC 25160.2 Used Oil Shipment Record Keeping	X	
217. H&SC 25279.5(c) Spill Prevention Control and Counter-measure Plan Complete <input type="checkbox"/> Referral to RWQCB # No Plan <input type="checkbox"/>			X	241. H&SC 25250.7 Used Oil Not Contaminated with Hazardous Waste	X	
Preparedness, Prevention and Contingency Planning				242. 22CCR 66266.130 Used Oil Filters		X
218. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.32 Required Fire, Spill, & Decontamination Equipment	X			243. 22CCR 66266.81 Batteries Property Managed	X	
219. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.33 Testing and Maintenance Fire, Spill, & Decontamination of Equipment	X			Universal Waste		
220. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.34 Access to Communications or Alarms	X			244. 40 CFR 273, 22 CCR 66273 Universal Waste Fluorescent tubes, batteries, and mercury switches	X	
221. 22CCR 66262.34 (d) Evacuation Plan	X			Specific Materials		
222. 22CCR 66262.34 (d) (2), 66262.34 (a) (3), 66265.37, 66265.56, 66265.52 (f), 66265.55 Arrangements with Local Authorities	X			245. H&SC 25144.6 Contaminated Rags	X	
223. 22CCR 66262.34 (d) Emergency Coordinator Listed	X			246. H&SC 25143.13, 40 CFR 261 Silver Only Waste		X
224. 66262.34 (a) (3), 66265.52 Emergency Response Procedures	X			247. Other:		

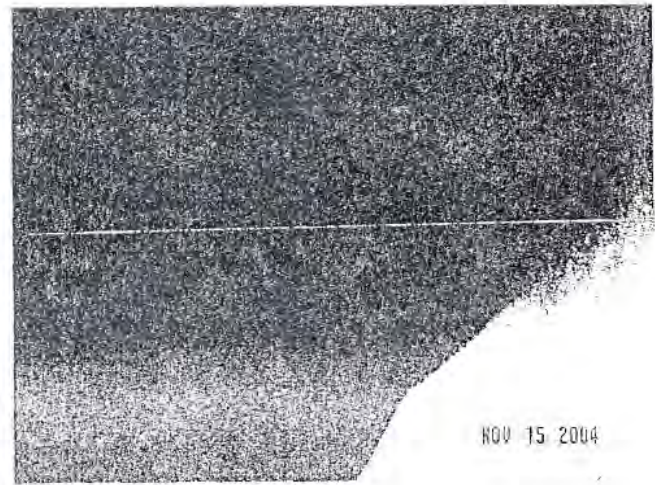
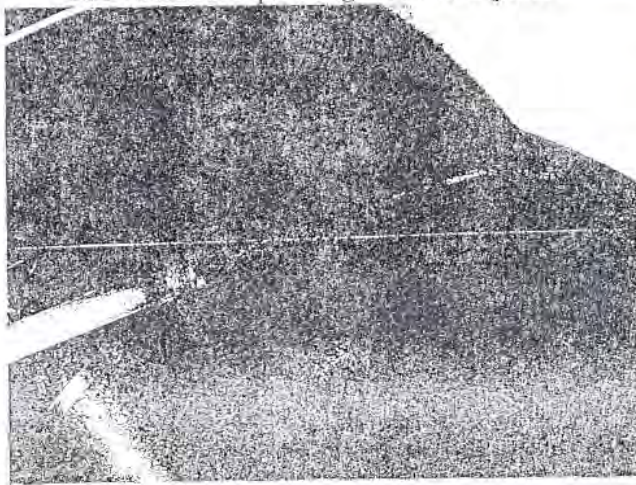
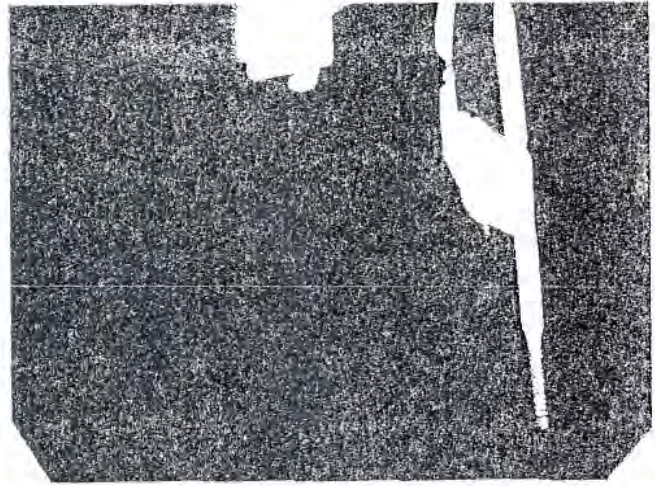
The above mentioned violations shall be corrected within 30 days See ATTACHED REPORT

Specialist: Pace Mitchem Received By: Jon Morgan Title: FACILITY MANAGER
 Print Name: Jon Morgan

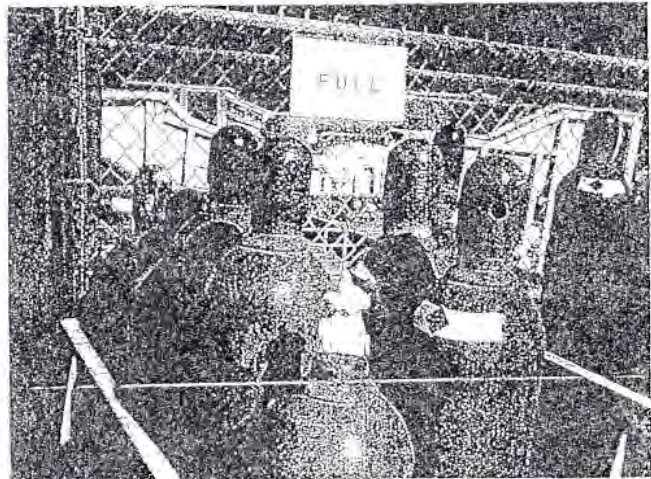
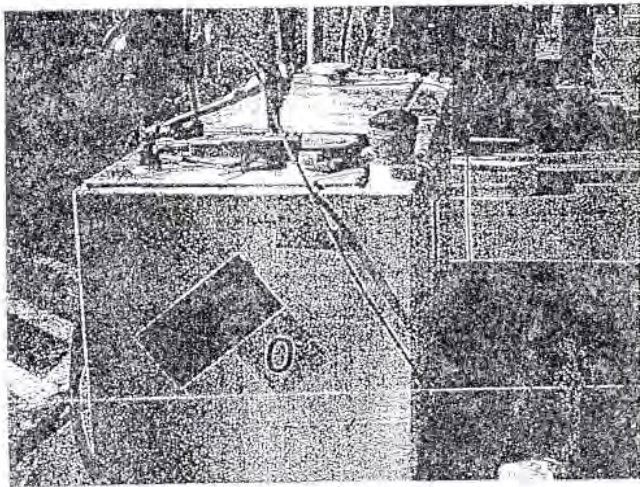
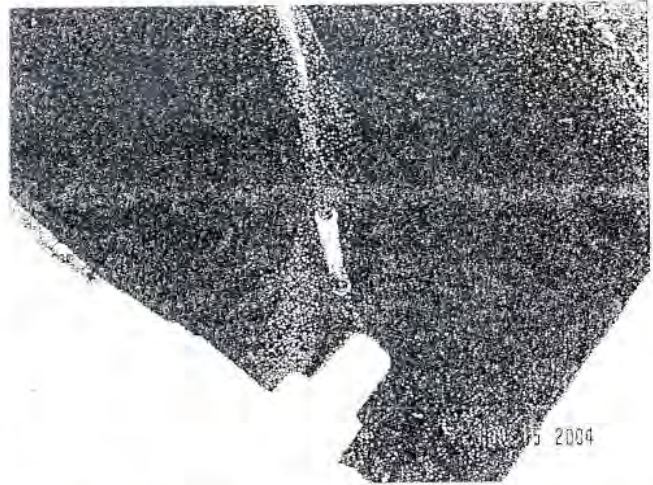
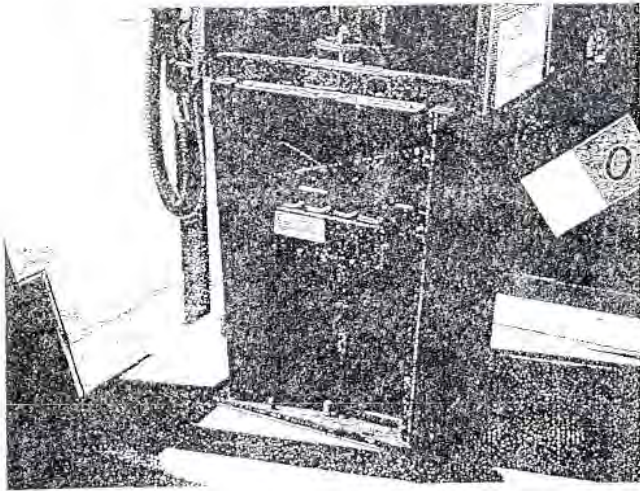
National RV
3411 North Perris Blvd.
Perris



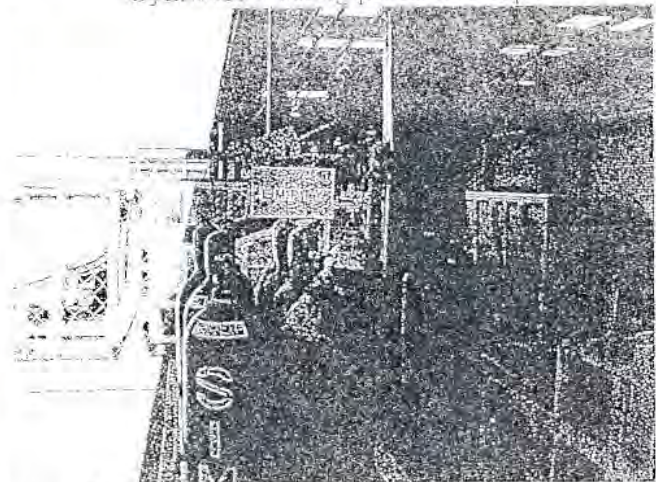
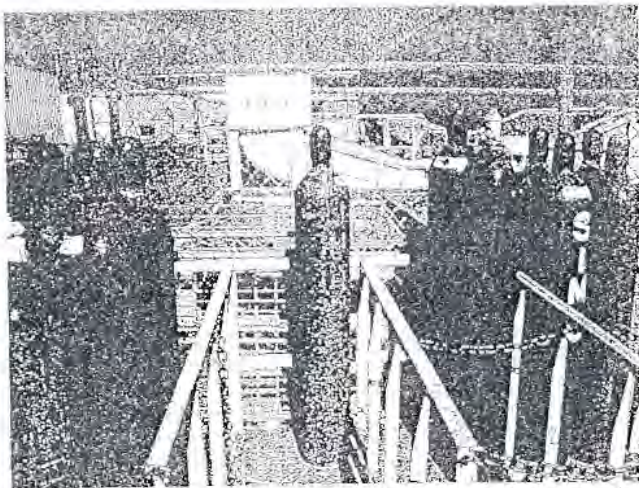
Fill bucket is separating from base plate



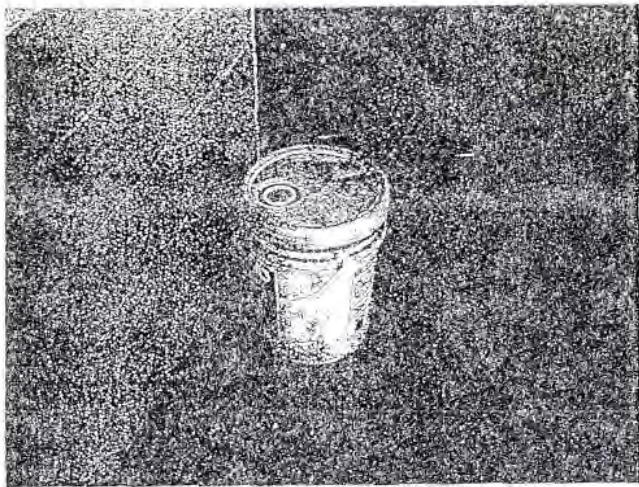
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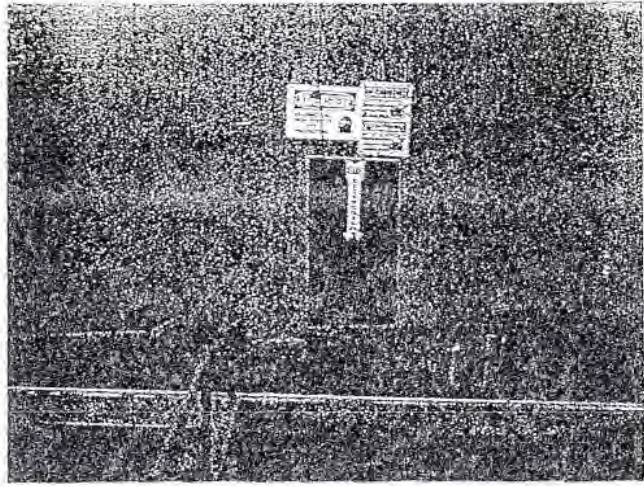
Cylinders missing protective caps



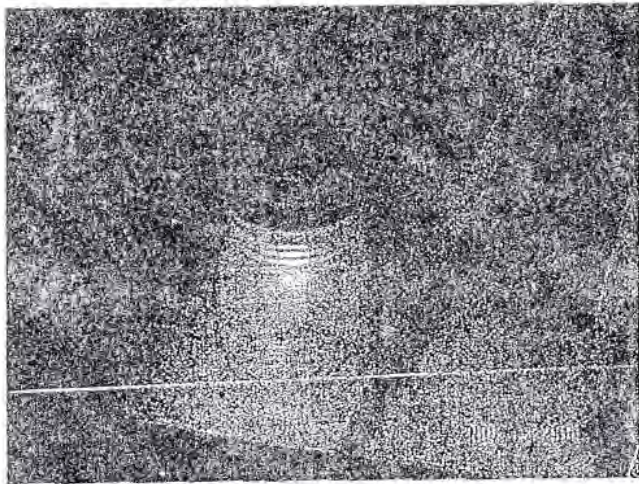
Cylinders missing protective caps and not secured in frame



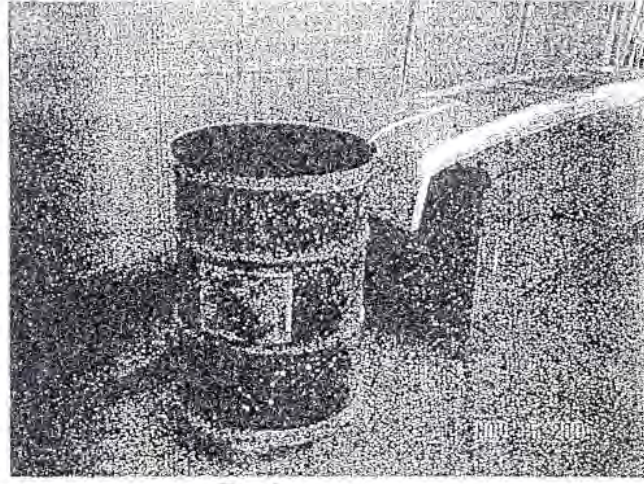
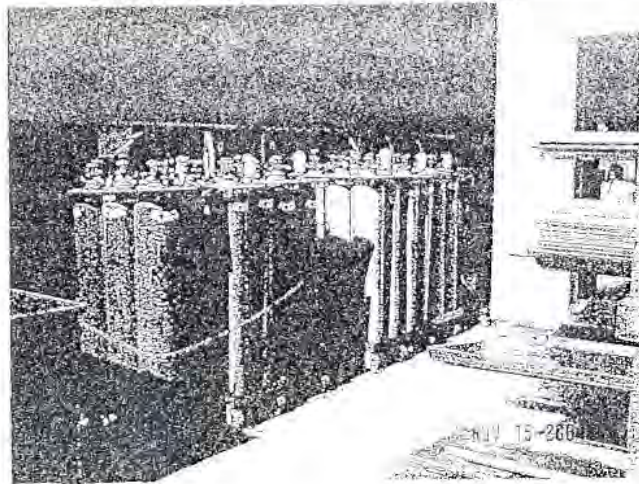
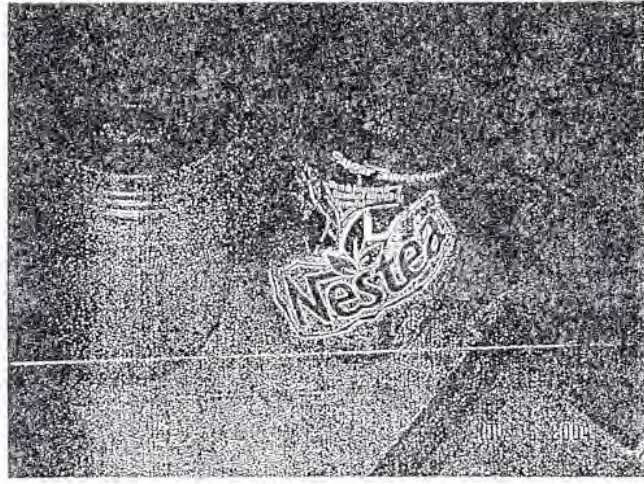
Unlabeled waste container



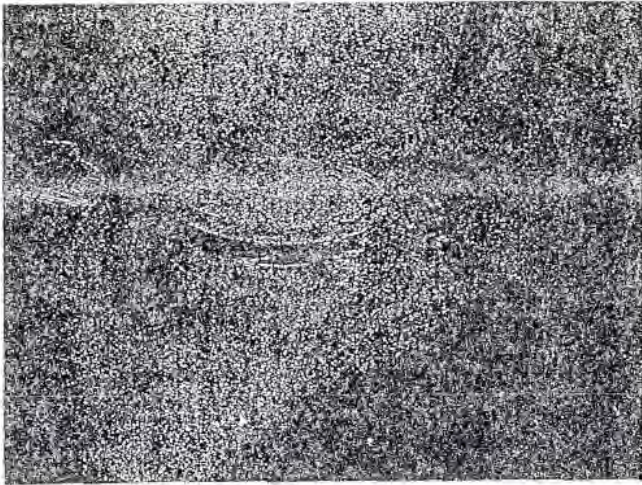
Missing Fire Extinguisher



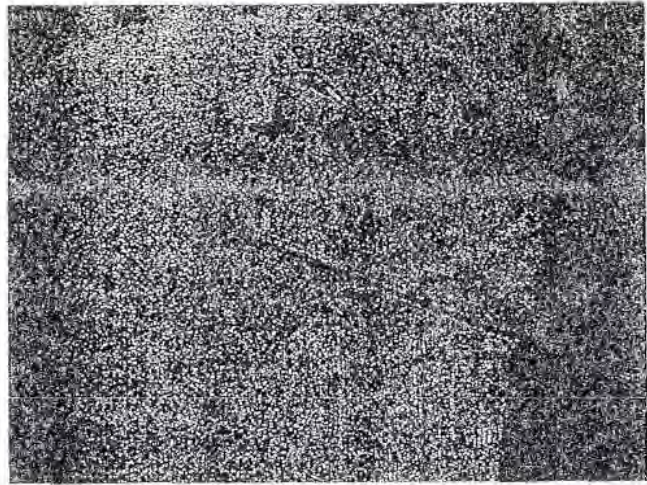
Unknown material in food container



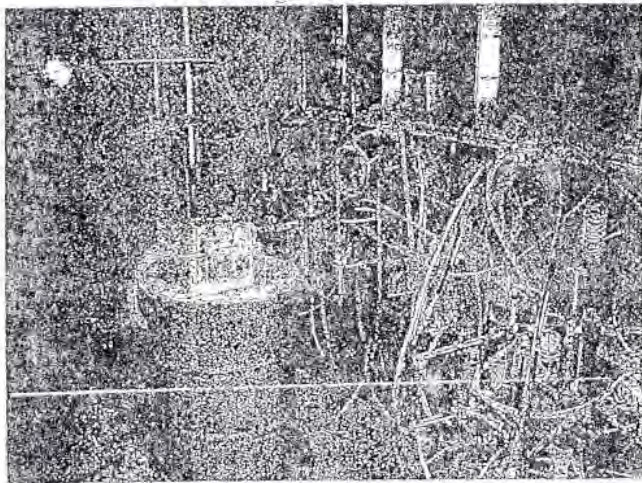
Trash container:



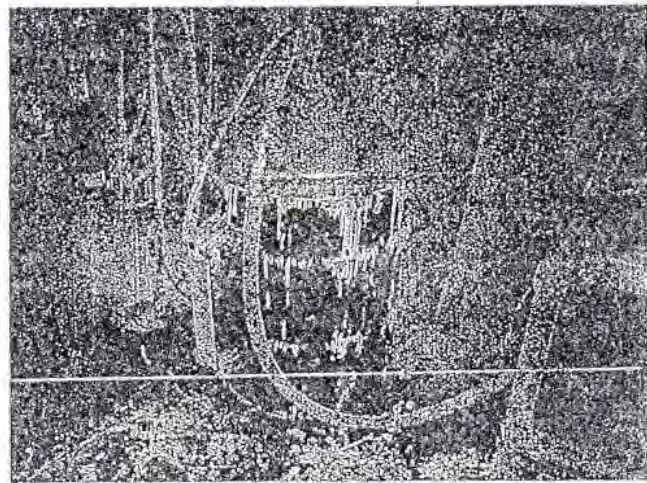
Gun being wasted



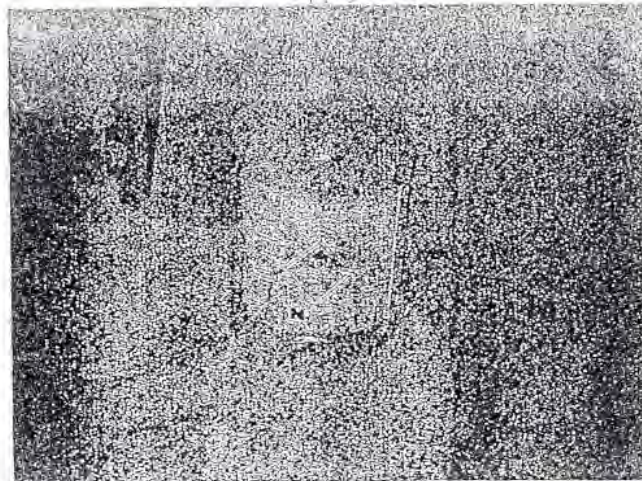
Label attached to cap



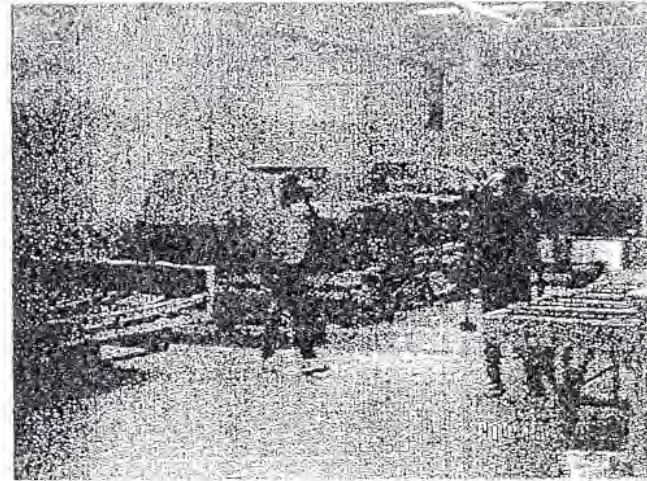
Gel Coat supply room

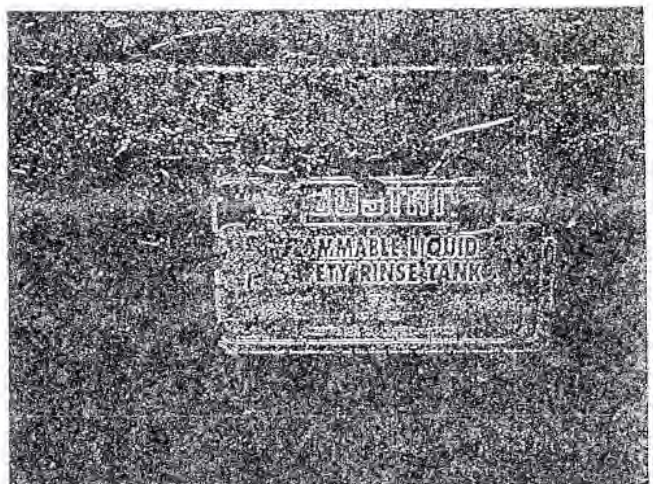
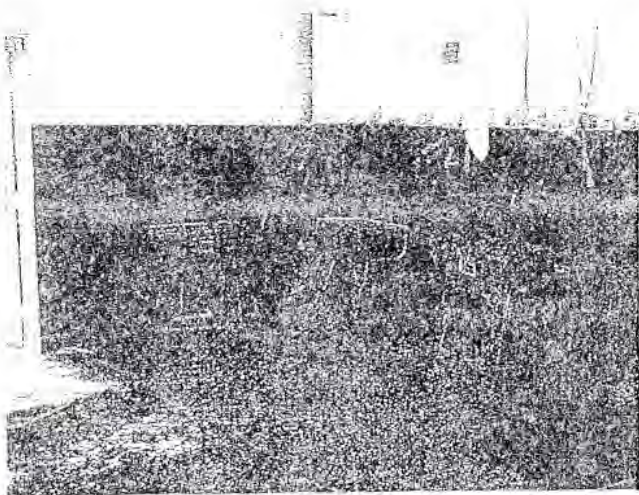


Electrical feed drum

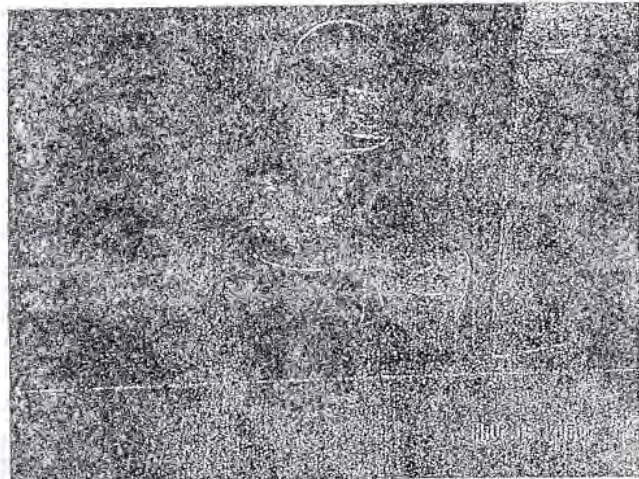


Peroxide on top of mixing drum

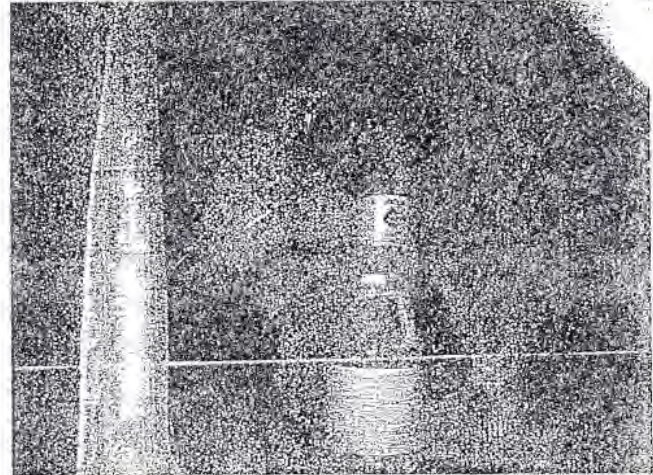




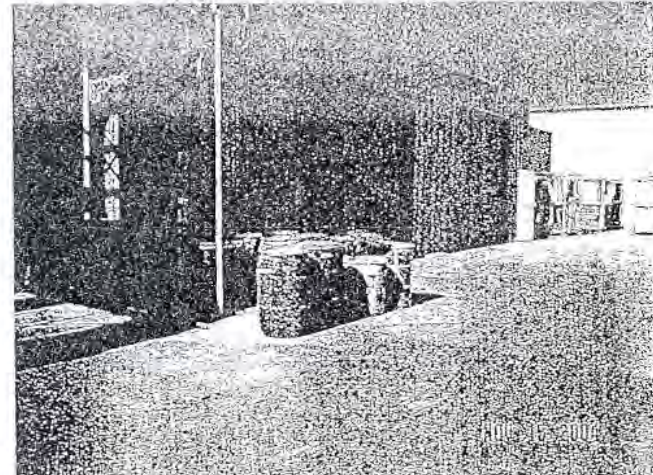
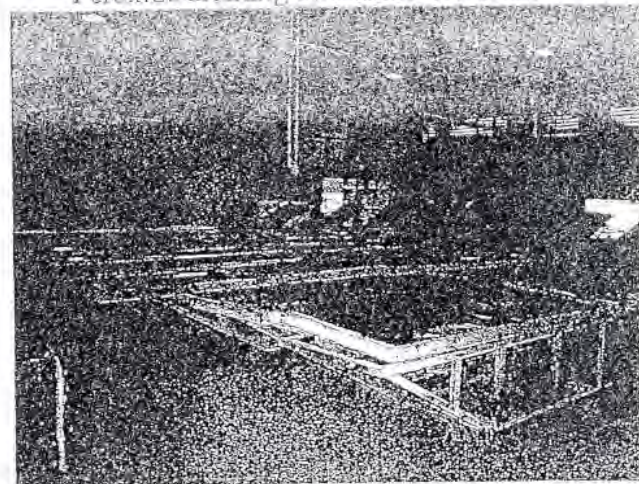
Flammable rinse tanks lid can not seal



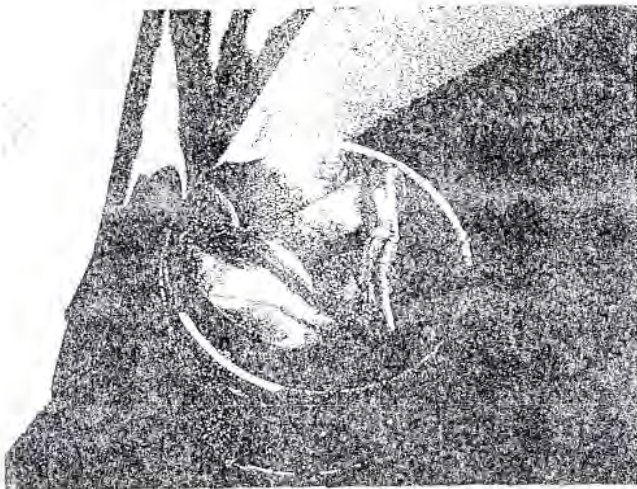
Peroxide draining into unlabeled drum



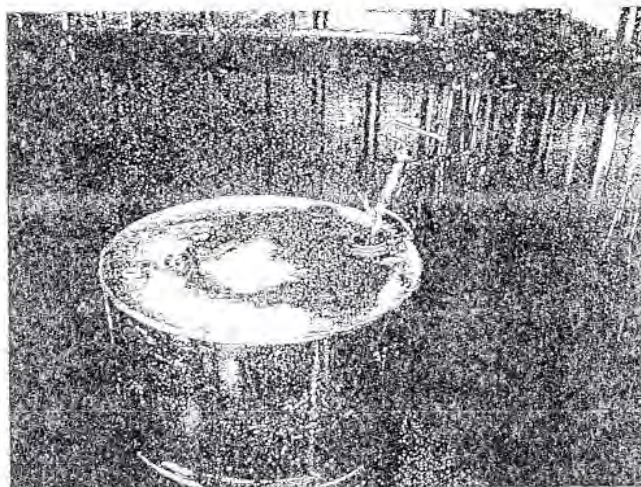
Empty Peroxide containers



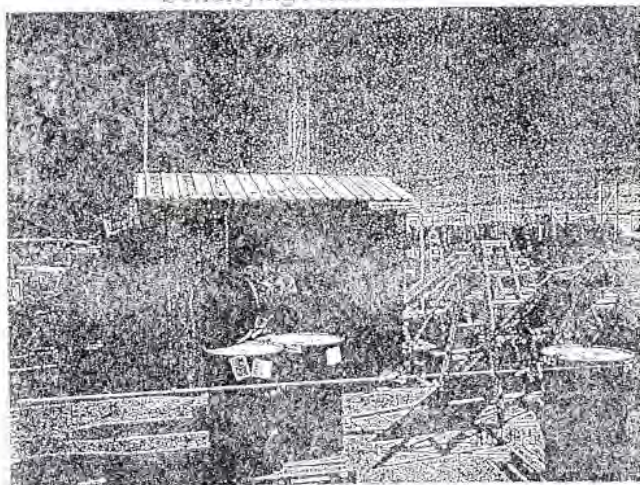
Empty and rag drains



Solidifying resin waste



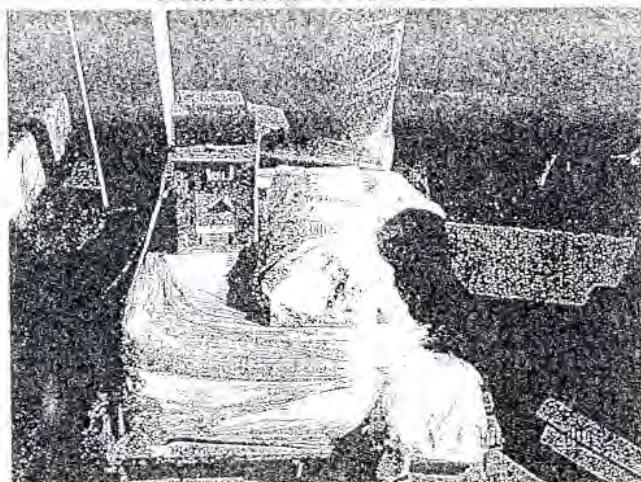
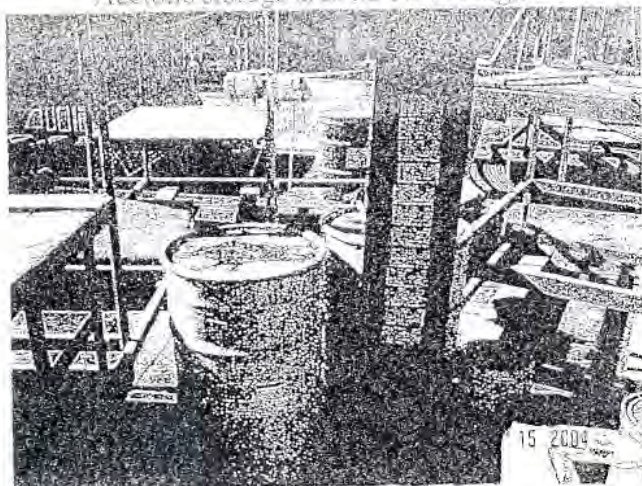
Open ungrounded Acetone drum



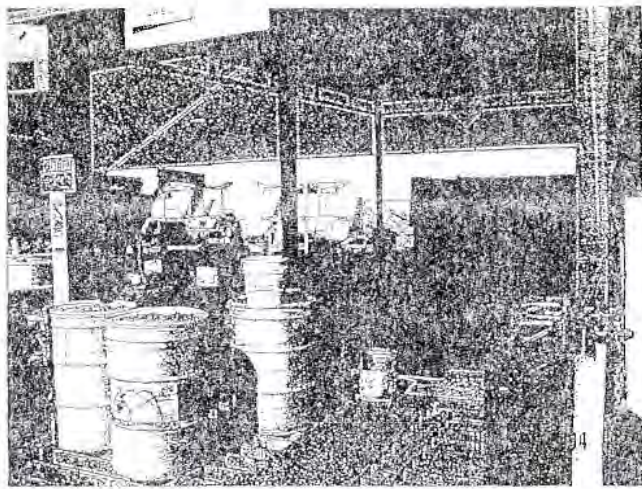
Acetone storage area no NFPA sign



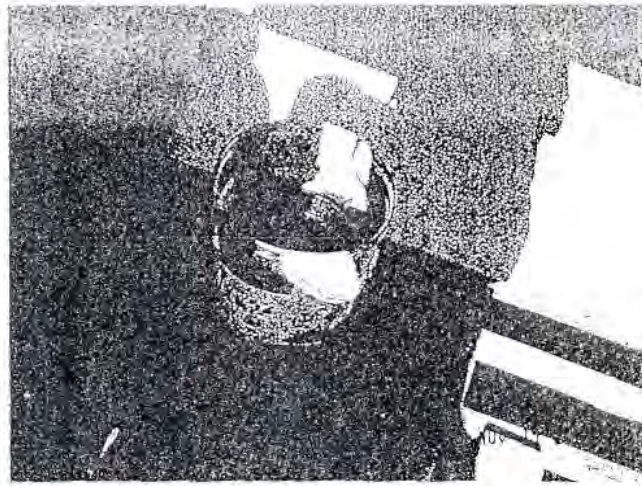
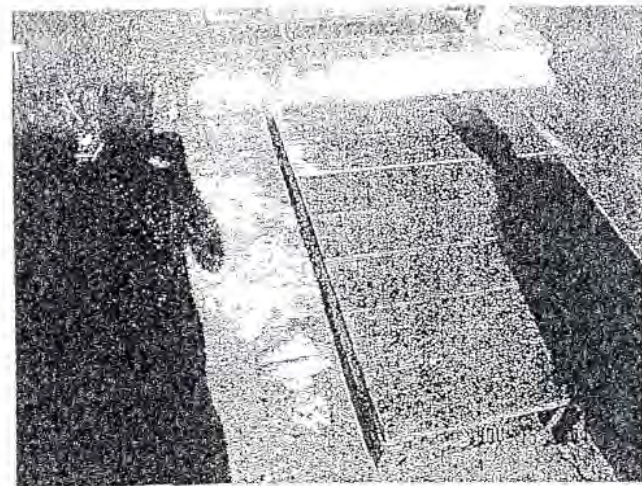
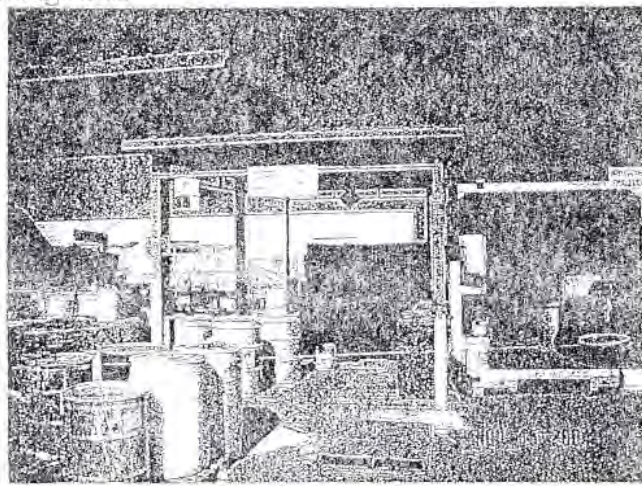
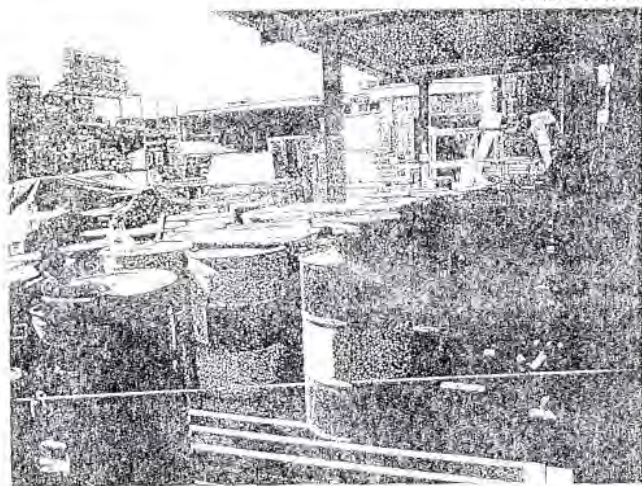
Bulk storage of chemicals



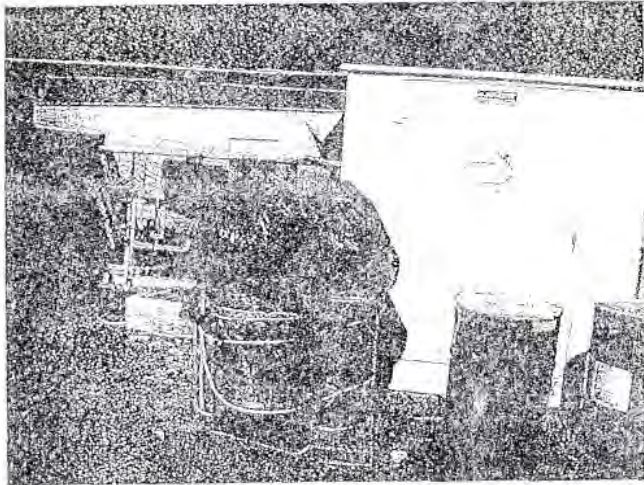
Peroxide set on top of incompatible



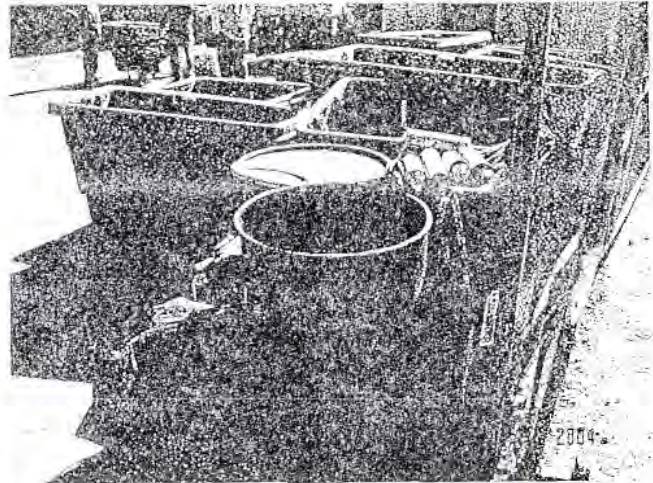
Haz Waste storage area



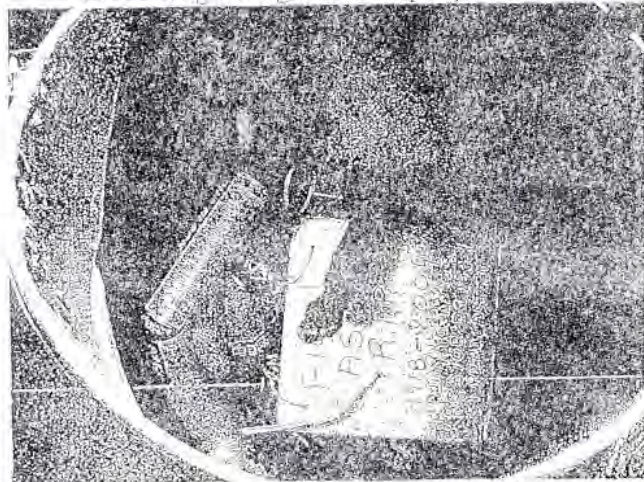
Open top container left in hazardous waste storage area



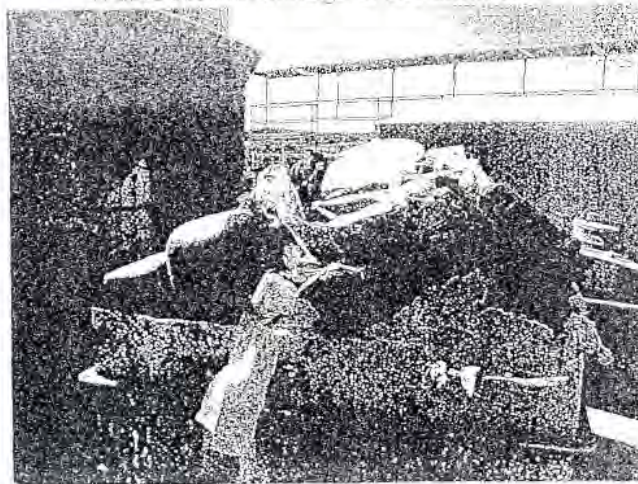
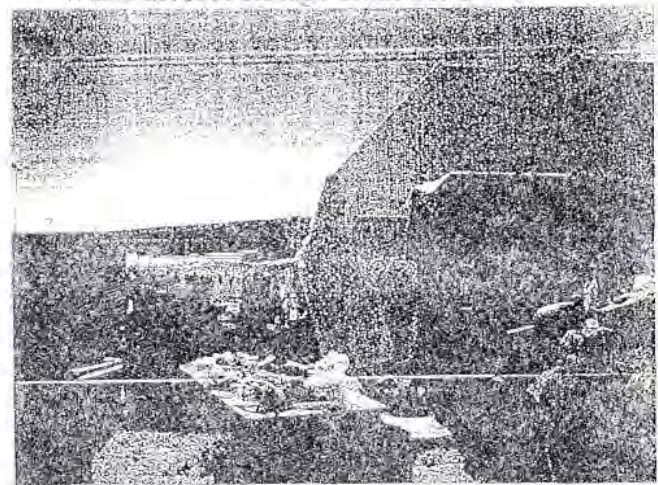
Interesting storage of multiple products



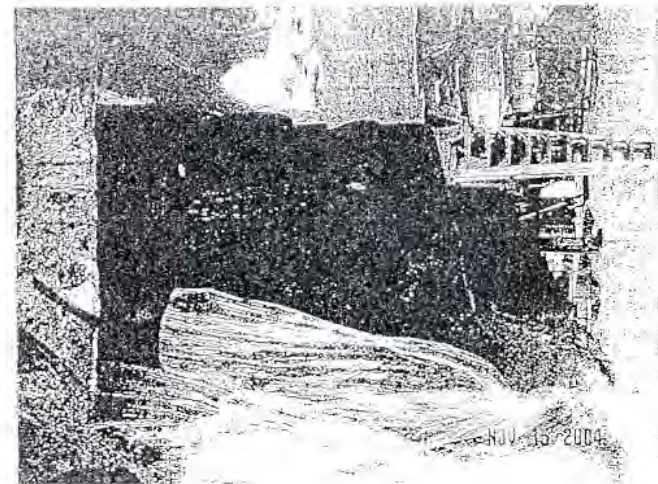
Waste aerosol storage drum unlabeled

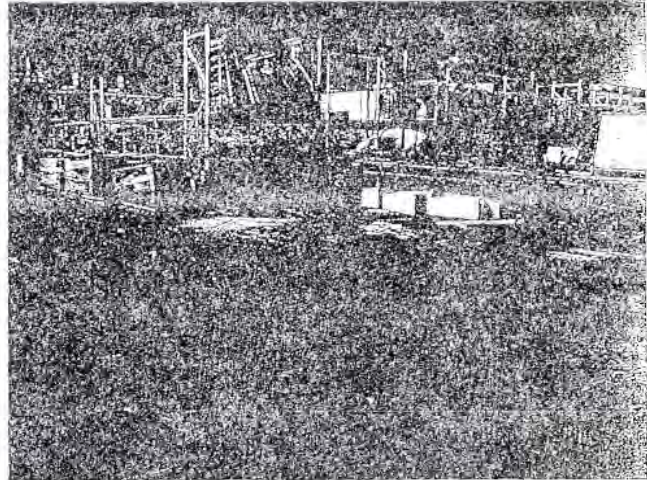
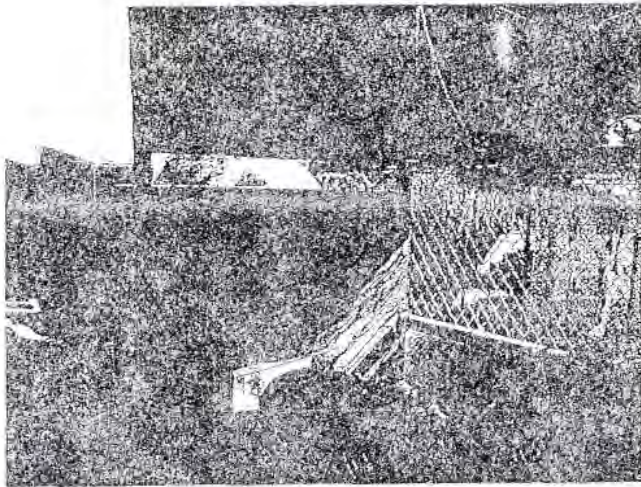


Waste aerosol storage drum unlabeled

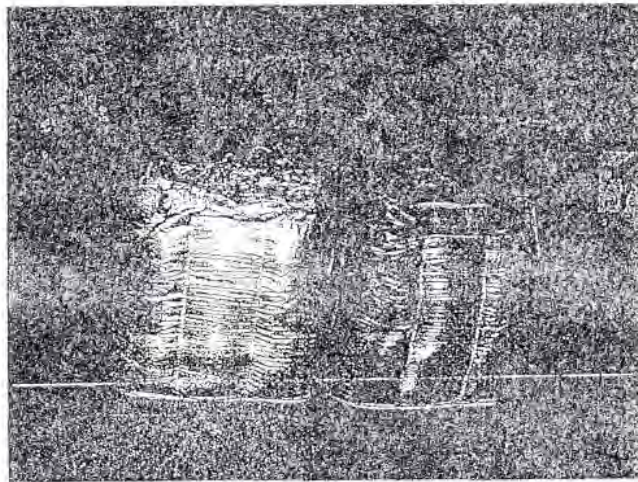


Waste temporary gasoline tanks





Waste solid with water leaching out chemicals



Not labeled totes of plastic

- Cylinders of compressed gas were discovered missing their protective caps and not secured to the storage frame. All cylinders are to be stored with their protective caps when not in use and having the gauges attached. Only during the transferring of cylinders are they allowed to be stored not secured.
- A food container was discovered in the chassis fab shop in the parts area. This container was missing any labels. From prior inspections by the Division the use of food containers for any purpose other than food is not an acceptable practice. National RV follow the enforcement informed the Division that food containers were restricted to areas outside of the work area.
- Containers of waste hazardous and not was discovered not to be labeled. If not a trash container these containers are to be labeled. Hazardous waste containers are to be labeled prior to the first placement of the waste into the container and the label filled out. Those containers used in the sorting area as transfer containers which will only store the hazardous waste for the period of time the sorting is to be conducted can have a label indicating it is used for hazardous waste but not have to have the proper label.
- Transferring of a hazardous material into another container requires the container used for this storage be labeled. An example of not labeling the container is the transferring of the Peroxide into a drum that is not-labeled. All hazardous materials are required to be stored in properly labeled containers. National

RV was very proud of their labeling system following the enforcement and seems to have lost its commitment to that program.

- In the hazardous waste storage area an open top 5 gallon container was left unattended adjacent to the drums. Besides being easily over turned unlabeled material in this area is unacceptable. When open containers are brought into the hazardous waste storage area they are to be transferred right away into a sealed container.
- Placing peroxide containers on top of chemicals that may be reactive with the peroxide is unacceptable storage. This is even when the placement is for a few minutes. Incompatibles are to be stored in separate areas or isolated by physical barriers. Placing the peroxide on top of a mixing drum of resin or on top of a powder Hydrated Alumina are to examples of this type of placement. Employees need to know when chemicals are incompatible.
- Open container of Acetone with pump in the opening is an unacceptable way of storing very flammable materials. Flammable liquid are to be stored in a sealed container and if a pump is in the container it is to be sealed. Standard industrial practice for transferring of flammable liquid is to ground the container. Both of these practices are to be practiced by National RV.
- Last inspection of the flammable liquid storage area all of the drums and other metal containers were grounded via the steel grading being grounded. This inspection the grounding of the flammable liquids was not being done. As industry normally has this practice in place as part of the fire prevention practice it needs to be once again established. The flammable liquid storage area needs a lot of work to have the drums all stored in the protected area with containment.
- Containment of hazardous chemicals is once again an issue that needs to be addressed. In outside storage area storm water issues require various forms of protection to include protection from rain, protection from spills being released to storm water run off, etc. drums setting in the area where vehicles drive through need to be protected and have containment.
- The equipment designed to rinse flammable liquid tools are to be sealed when items are not being transferred in or out of the rinse tank. One if not more of these were not able to close due to poor maintenance of the rinse tank. The build up of the rinse on the lip of the tank prevented the lids from sealing. These rinse tank are to be cleaned and the seals maintained.
- Fill bucket has started to separate from its base plate. The integrity of the spill containment is required to be maintained so this is required to be repaired ASAP.
- Outside storage of chemicals that met or exceed the federal and state standards are required to have posted the NFPA 704 sign adjacent to the storage area. The compress gas cylinders, acetone storage as well as other areas did not have the required NFPA 704 sign posted. The Division is requiring the posting of the NFPA 704 sign when ever the chemical storage meets or exceeds the 500 pounds, 55 gallons or 200 standard cu. ft. of compressed gas.
- Empty containers are found all over the facility and are either not labeled or have the original label. From past inspection the Division had requested these containers be consolidated and labeled empty to assist the responders and National RV/s employees in the event of an emergency at this facility. No labeling has been seen to indicate which of the drums in an area are empty.
- A white material was spilled near the hazardous waste area. While I was inspecting this area water start to flow through the white material. The water then spread the white material as if it was rain water flowing towards the storm water collection point. Better handling of the chemicals on the property is required under storm water permitting and possible hazardous waste regulations depending on the material spill or released.

Signature of National RV Representative: _____





Certified Unified Program Agency
 County of Riverside Community Health Agency
 Department of Environmental Health Hazardous Materials Management Division
 Hazardous Materials Handler Inspection Report

Facility Name: National RV Date: Nov 15 17 2009
 Address: 3411 North Perris Blvd Inspection: Routine Reinspection
 City: Perris Zip Code: 92571 Level: _____ Facility #: 82241
 Contact Person: _____ Number of Employees: _____ Telephone: (909) 322-6007

Riverside County Ordinance 651 California Code of Regulations Title 19 Health & Safety Code Chapter 6.95 California Fire Code

Y	N	N/A	Item marked "No" are violations of the above-referenced codes and must be corrected as follows:
<input checked="" type="checkbox"/>			100. Current Permit <i>Need to have employee know the location of BEP info that is easily available.</i>
<input checked="" type="checkbox"/>			101. Hazardous Materials Business Emergency Plan
<input checked="" type="checkbox"/>			A. Approved Plan on Site and Available for Review
<input checked="" type="checkbox"/>			B. Plan Updated within Past 3 Years
<input checked="" type="checkbox"/>			102. Chemical Inventory Disclosure <i>See Attached Report</i>
<input checked="" type="checkbox"/>			A. Chemical Inventory Complete
<input checked="" type="checkbox"/>			B. Inventory Updated Annually <i>Need to write on training program as it is not effective.</i>
<input checked="" type="checkbox"/>			103. Emergency Response Plans and Procedures
<input checked="" type="checkbox"/>			A. Prevention, Mitigation and Abatement Measures
<input checked="" type="checkbox"/>			B. Documented Employee Training
<input checked="" type="checkbox"/>			C. Evacuation Plan with Routes
<input checked="" type="checkbox"/>			D. Facility Map with Location of Chemicals
<input checked="" type="checkbox"/>			E. MSDS Available
<input checked="" type="checkbox"/>			104. Posting
<input checked="" type="checkbox"/>			A. NFPA 704 Sign(s) Posted
<input checked="" type="checkbox"/>			B. Emergency Phone Numbers Posted
<input checked="" type="checkbox"/>			C. Hazardous Materials Storage Area Posted
<input checked="" type="checkbox"/>			D. Emergency Equipment Posted
<input checked="" type="checkbox"/>			E. Pesticide Storage Area Posted
<input checked="" type="checkbox"/>			105. Storage
<input checked="" type="checkbox"/>			A. Maintained to Minimize the Possibility of Release
<input checked="" type="checkbox"/>			B. Handling Areas Secured
<input checked="" type="checkbox"/>			C. Incompatibles Stored Separately
<input checked="" type="checkbox"/>			D. Containers Properly Labeled
<input checked="" type="checkbox"/>			106. Other

The above noted violations shall be corrected within 30 days.

Received by: [Signature]
 Print Name: Jon Morgan
 Title: FACILITY MANAGER

NFPA 704 SIGNS





Specialist: Paul Matheau

Riverside Office (909) 358-5055 P.O. Box 7489 Riverside, CA 92513-7489
 Indio Office (760) 863-8976 47-923 Oasis Street, Rm. E-4 Indio, CA 92201
 Hemet Office (909) 766-6524 800 S. Sanderson Avenue Hemet, CA 92545

National RV
100 South Sinclair and 3411 North Perris Blvd.
Perris, Ca. 92571

Business Emergency Plan

- Placement of NFPA 704M signage: Both facilities need to have the NFPA 704M signage installed where chemical storage exceeds the limits as defined within the requirements of the federal, state and local permitting requirements. In area where I have previously seen these signs (hazardous materials/waste storage area) the NFPA 704M signs were not present for this inspection. In the new area of the facility the signs were not as yet installed.
- Chemical storage needs to be worked on in both facilities. A common problem with the storage is the unstable stacking of the hazardous chemicals. An example of this is the storage of five-gallon containers in stacks of three or more. The higher the stack the more pronounced the tilting of the upper levels becomes. An easy correction for this type of problem is to place a pallet between the levels as normally seen within the chemical handling industry.
- Chemical storage of incompatible chemicals was discovered within the fire cabinets and other areas. Flammable liquids and oxidizers are generally known to be incompatible and require a physical separation in case of a leak/release. MEKP and flammable paints are such a combination of incompatible chemicals. Resins and MEKP are another such combination that was seen being stored within the same area and having no physical separation.
- Within many of the wood working areas and other assembly areas what appeared to be water bottles containing a solution that is not water (white opaque liquid). As I did witness containers were supplied and very nice labels are made available for the employees. As many of the containers were in correctly labeled it would appear that more training is required to get the few employees that use an inappropriate container to take steps to correct this problem. It is recommended that food and drink containers that may be used inappropriately be banned from the work area.
- Within the laminating area of the RV assembly area, there are drums without labels visible or any other signage indicating the material being stored. Other areas also had similar problems with containers in use that the labels are not visible. Signage over the drums would correct this problem.
- Mobil fuel tanks were seen with masking tape labels. The masking tape labels need to be replaced with a better signage as masking tape is too easy to remove by just brushing up to the container or the contained product dissolving the adhesive material from the tape backing.
- In the research/development area the storage of hazardous materials is a problem relating to incompatible storage and labeling. From the discussion while we were in the area it may be best to reduce the total volume of chemical storage and to redesign the chemical storage area to meet the overall needs of the department.
- The fiberglass molding area needs to be checked daily as the incompatible chemicals (MEKP and resins) are normally used in this area. House keeping for the chemical storage is of great concern and the need to provide NFPA 704

signage is required. The danger of fire from the reaction of the resin with the MEKP needs to be stressed with the employees who did not want to speak English or take direction from supervision in English. This area of operation can be very dangerous if communication problem exist between the supervisors and employees.

- Storage of compress gas cylinders has two problems discovered during this inspection. The first is the securing of the cylinders to a fixed object or mobile unit, and the second problem is several cylinders did not have their protective caps installed. As in the past the cylinders being secured are a problem that requires National RV to take corrective steps now. The receiving of cylinders with the shrink rap over the valve is not a substitute for the protective cap. National RV should accept no cylinder from the supplier until all caps are correctly installed on the cylinder. When the useful life of the cylinder has been reached then the cylinder should be removed from operation and its protective cap replaced. The useful life of a cylinder does not mean that cylinder does not have pressure but that for its intended use the gas being provided does not meet the required volume. All cylinders are to be secured when not being physically transferred. The physically transferred portion means the person who is transferring is actually involved of the transfer and has not started another project, taken a break or other activity. Cylinders should not be left standing for any extended period of time. See the OSHA requirements for how to correctly handle compress gas cylinders.
- As recommended in the past empty containers should be collected into an area where signage is present to indicate the containers are empty. Having containers that are empty, partial and full all in the same location is confusing to the responders as well as the employees.

National RV has shown signs of trying to reach compliance but more work is required. Training of the employees is greatly needed to prevent the items being addressed from being future problems. A recommendation for National RV would be to have more staff assigned to environmental compliance or a staff person who's sole purpose is to insure compliance. OSHA requires that any person working with hazardous waste have their 40 hours Hazwopper training and this would include the waste inspectors National RV is currently employing.

The label stations National RV has designed are some of the best I have seen with the MSDS materials being located at these stations. Continued work is needed to make these stations effective as the employees are not all using these stations.

The stopping the compress gas can puncturing is a step taken in the right direction. The search for an expectable alternative is another reminder that National RV wants to comply when given information on when corrective action is needed. National RV should investigate if the glue cylinders and aerosol canister will required the use of the collection device per South Coast Air Quality Management District.

58989 Vapor Line only
 P11m Nov 23, 04

SECONDARY CONTAINMENT TESTING REPORT FORM

Pacific Systems Electric

Murrieta California 92563

California State License No. 561275

Servicing the Petroleum Industry Since 1989

This form is intended for use by contractors performing initial & periodic testing of UST secondary containment systems. Use the appropriate pages of this form to report results for all components tested. The completed form, and printouts from tests (if applicable), must be provided to the facility owner/operator for submittal to the local implementing agency.

1. FACILITY INFORMATION

Facility Name: National RV	Date of Testing: 11-15-04
Facility Address: 3411N. Perris Blvd.	Test Type:
Facility Contact: Jon Morgan	Phone: 951-6007 X 4226
Date Local Agency Was Notified of Testing: 11-08-04	<input type="checkbox"/> Initial
Name of Local Agency Inspector (if present during testing): Steve Arch	<input checked="" type="checkbox"/> 6 month
	<input type="checkbox"/> 36 month

2. TESTING CONTRACTOR INFORMATION

Company Name: Pacific Systems Electric		
Technician Conducting Test: Eric W. Larison		
Credentials: <input checked="" type="checkbox"/> CSLB Licensed Contractor <input type="checkbox"/> SWRCB Licensed Tank Tester		
License Type: A-General Engineering License Number: 561275		
Manufacturer Training		
Manufacturer	Component(s)	Date Training Expires
A.O. Smith	Piping	8-06

3. SUMMARY OF TEST RESULTS

Component	Pass	Fail	Not Tested	Repairs Made	Component	Pass	Fail	Not Tested	Repairs Made
Vapor Secondary Piping	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If hydrostatic testing was performed, describe what was done with the water after completion of tests:
 Test water was pumped into (0) -55 Gallon drums, labeled as Hazardous Waste, and left with tank owner for proper disposal.

CERTIFICATION OF TECHNICIAN RESPONSIBLE FOR CONDUCTING THIS TESTING

To the best of my knowledge, the facts stated in this document are accurate and in full compliance with legal requirements

Technician's Signature: 

Date: 11-15-04

Monitoring Cert / Spill Bucket Test

Passes

PLM

Nov 23, 04

PACIFIC SYSTEMS ELECTRIC

Servicing the Petroleum Industry Since 1989

CA License #561275

MONITORING SYSTEM CERTIFICATION

ENTERED

For Use by All Jurisdictions within the State of California

Authority Cited: Chapter 6.7, Health and Safety Code; Chapter 16, Division 3, Title 23, California Code of Regulations

This form must be used to document testing and servicing of monitoring equipment. If more than one monitoring system is installed at the facility, A separate certification or report must be prepared for each monitoring system control panel by the technician who performs the work. A copy of this form must be provided to the tank system owner/operator. The owner/operator must submit a copy of this form to the local agency regulating UST systems within 30 days of test date.

A. General Information

Facility Name: National RV

Site Address: 3411 N. Perris Blvd City: Perris Zip: 92571

Facility Contact Person: John Morgan Contact Phone No.: 951-943-6007

Make/Model of Monitoring System: Veeder Root TLS-300C Date of Testing/Servicing: 11-15-04

B. Inventory of Equipment Tested/Certified

Check the appropriate boxes to indicate specific equipment inspected / serviced:

Tank ID: Unleaded 87 8,000 Gallon <input checked="" type="checkbox"/> In-Tank Gauging Probe. Model: Mag 1 <input checked="" type="checkbox"/> Annular Space or Vault Sensor. Model: 407 <input checked="" type="checkbox"/> Piping Sump / Trench Sensor(s). Model: 208 <input checked="" type="checkbox"/> Fill Sump Sensor(s). Model: 208 <input type="checkbox"/> Mechanical Line Leak Detector. Model: <input type="checkbox"/> Electronic Line Leak Detector. Model: <input type="checkbox"/> Tank Overfill / High-Level Sensor. Model: <input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2).	Tank ID: <input type="checkbox"/> In-Tank Gauging Probe. Model: <input type="checkbox"/> Annular Space or Vault Sensor. Model: <input type="checkbox"/> Piping Sump / Trench Sensor(s). Model: <input type="checkbox"/> Fill Sump Sensor(s). Model: <input type="checkbox"/> Mechanical Line Leak Detector. Model: <input type="checkbox"/> Electronic Line Leak Detector. Model: <input type="checkbox"/> Tank Overfill / High-Level Sensor. Model: <input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2).
Tank ID: <input type="checkbox"/> In-Tank Gauging Probe. Model: <input type="checkbox"/> Annular Space or Vault Sensor. Model: <input type="checkbox"/> Piping Sump / Trench Sensor(s). Model: <input type="checkbox"/> Fill Sump Sensor(s). Model: <input type="checkbox"/> Mechanical Line Leak Detector. Model: <input type="checkbox"/> Electronic Line Leak Detector. Model: <input type="checkbox"/> Tank Overfill / High-Level Sensor. Model: <input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2).	Tank ID: <input type="checkbox"/> In-Tank Gauging Probe. Model: <input type="checkbox"/> Annular Space or Vault Sensor. Model: <input type="checkbox"/> Piping Sump / Trench Sensor(s). Model: <input type="checkbox"/> Fill Sump Sensor(s). Model: <input type="checkbox"/> Mechanical Line Leak Detector. Model: <input type="checkbox"/> Electronic Line Leak Detector. Model: <input type="checkbox"/> Tank Overfill / High-Level Sensor. Model: <input type="checkbox"/> Other (specify equipment type and model in Section E on Page 2).
Dispenser ID: 1-2 <input checked="" type="checkbox"/> Dispenser Containment Sensor(s). Model: 208 float <input checked="" type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).	Dispenser ID: <input type="checkbox"/> Dispenser Containment Sensor(s). Model: 208 float <input type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).
Dispenser ID: <input type="checkbox"/> Dispenser Containment Sensor(s). Model: 208 float <input type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).	Dispenser ID: <input type="checkbox"/> Dispenser Containment Sensor(s). Model: 208 float <input type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).
Dispenser ID: <input type="checkbox"/> Dispenser Containment Sensor(s). Model: 208 float <input type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).	Dispenser ID: <input type="checkbox"/> Dispenser Containment Sensor(s). Model: 208 float <input type="checkbox"/> Shear Valve(s). <input type="checkbox"/> Dispenser Containment Float(s) and Chain(s).

*If the facility contains more tanks or dispensers, copy this form. Include information for every tank and dispenser at the facility.

C. Certification - I certify that the equipment identified in this document was inspected/serviced in accordance with the manufacturers' guidelines. Attached to this Certification is information (e.g. manufacturers' checklists) necessary to verify that this information is correct and a Site Plot Plan showing the layout of monitoring equipment. For any equipment capable of generating such reports, I have also attached a copy of the report; (check all that apply): System set-up Alarm history report

Technician Name: Eric W. Larison Signature: _____ Certification No: 006-05-1175
 Testing Company Name: Pacific Systems Electric License No: 561275
 Company Address: 38330 Via La Paloma, Murrieta, CA 92563 Phone No: 951.677.0704

PACIFIC SYSTEMS ELECTRIC

Servicing the Petroleum Industry Since 1989

Monitoring System Certification

D. Results of Testing/Servicing

Software Version Installed: 15.01

Complete the following checklist:

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Is the audible alarm operational?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Is the visual alarm operational?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Were all sensors visually inspected, functionally tested, and confirmed operational?
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Were all sensors installed at lowest point of secondary containment and positioned so that other equipment will not interfere with their proper operation?
<input type="checkbox"/> Yes	<input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A	If alarms are relayed to a remote monitoring station, is all communications equipment (e.g. modem) operational?
<input type="checkbox"/> Yes	<input type="checkbox"/> No* <input checked="" type="checkbox"/> N/A	For pressurized piping systems, does the turbine automatically shut down if the piping secondary containment monitoring system detects a leak, fails to operate, or is electrically disconnected? If yes: which sensors initiate positive shut-down? (Check all that apply) <input type="checkbox"/> Sump/Trench Sensors; <input type="checkbox"/> Dispenser Containment Sensors. Did you confirm positive shut-down due to leaks and sensor failure/disconnection? <input type="checkbox"/> Yes; <input type="checkbox"/> No.
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No* <input type="checkbox"/> N/A	For tank systems that utilize the monitoring system as the primary tank overfill warning device (i.e. no mechanical overfill prevention valve is installed), is the overfill warning alarm visible and audible at the tank fill point(s) and operating properly? If so, at what percent of tank capacity does the alarm trigger? %
<input checked="" type="checkbox"/> Yes*	<input type="checkbox"/> No	Was any monitoring equipment replaced? If yes, identify specific sensors, probes, or other equipment replaced and list the manufacturer name and model for all replacement parts in Section E, below.
<input type="checkbox"/> Yes*	<input checked="" type="checkbox"/> No	Was liquid found inside any secondary containment systems designed as dry systems? (Check all that apply) <input type="checkbox"/> Product; <input type="checkbox"/> Water. If yes, describe causes in Section E, below.
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Was monitoring system set-up reviewed to ensure proper settings? Attach set up reports, if applicable
<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No*	Is all monitoring equipment operational per manufacturer's specifications?

* In Section E below, describe how and when these deficiencies were or will be corrected.

E. Comments: The Annular sensor was replaced. The sensor was working but the monitor showed it out.

Designation of Underground Storage Tank (UST) Operator **COMPLETED**

UST Owner Statement of Understanding and Compliance with UST Requirements

Facility Name: National R.V.	Facility Permit #:					
Facility Address: 3411 North Perris Blvd.	Phone: (951) 943-6007 X4226					
City: Perris	Zip Code: 92571					
Reason for Submitting this Form (Check One) <input checked="" type="checkbox"/> Initial Certification <input type="checkbox"/> Change of Designated Operator <input type="checkbox"/> Certificate Renewal						

Designated Operator(s) for this Facility

PRIMARY DESIGNATED UST OPERATOR	
Designated Operator's Name: John Minnock	Relation to UST Facility (Check One)
Business Name (If different than above): Pacific Systems Electric	<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Employee
Designated Operator's Phone#: (714) 240-3674	<input type="checkbox"/> Service Technician <input checked="" type="checkbox"/> Third Party
International Code	Expiration Date: 12/09/2006
Council Certificate #: See Attached Certificate	


Alternate 1 (Optional)	
Designated Operator's Name: Dennis Minnock	Relation to UST Facility (Check One)
Business Name (If different than above): Pacific Systems Electric	<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Employee
Designated Operator's Phone#: (714) 713-9529	<input type="checkbox"/> Service Technician <input checked="" type="checkbox"/> Third Party
International Code	Expiration Date: 12/07/2006
Council Certificate #: See Attached Certificate	

Alternate 2 (Optional)	
Designated Operator's Name:	Relation to UST Facility (Check One)
Business Name (If different than above):	<input type="checkbox"/> Owner <input type="checkbox"/> Operator <input type="checkbox"/> Employee
Designated Operator's Phone#:	<input type="checkbox"/> Service Technician <input type="checkbox"/> Third Party
International Code	Expiration Date:
Council Certificate #:	

NOTIFY THE LOCAL REGULATORY AGENCY WITHIN 30 DAYS OF ANY CHANGES TO THIS INFORMATION

I certify that for the facility indicated at the top of this page, the individual(s) listed above will serve as Designated UST Operator(s). The individual(s) will conduct and document monthly facility inspections and annual facility employee training in accordance with California Code of Regulations, Title 23, Sections 27815(c) - (f). Furthermore, I understand and am in compliance with the requirements (statues, regulations, and local ordinances) applicable to underground storage tanks.

John Minnock _____ DATE: 12/27/2004
 NAME OF TANK OWNER OR OWNER'S AGENT (Please Print)

 _____ OWNER'S PHONE #: (951) 943-6007 X4226
 SIGNATURE OF TANK OWNER OR OWNER'S AGENT



Certified Unified Program Agency
 County of Riverside Community Health Agency
 Department Of Environmental Health Hazardous Materials Management Division
UNDERGROUND STORAGE TANK INSPECTION REPORT
DOUBLE WALLED SYSTEM



W

Inspector	Natasha L. R. V.	Date	April 5 2003
Site Address	3411 North Perris Blvd	City	
Permit		Phone No.	925 71
Inspector	John Morgan	Phone No.	(909) 943-6007
CMD Technical Present	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	

Refer to Title 23 of California Code of Regulations (CCR), Chapter 6.7 of the California Health and Safety Code (CHSC). Items marked "No" are violations of the Underground Storage Tank laws and regulations, and must be corrected as outlined in the inspection report. N/A is not applicable or unable to verify.

Item	Description	Code Sections	Tank ID			
			1	2	3	4
301	UPC Form A and B current	25286(a), 2712(i)	X			
302	Financial Responsibility current	25292.2(e), 2712(i)	X			
303	Owner/Operator Agreement submitted	2620(b), 25284(a)(3), 2712(i)		X		
304	Monitoring Plan approved	2632(a), 2634(d), 2712(i)	X			
305	Unauthorized Release Response Plan current	2632(a)(2), 2634(e), 2712(i)				
306	Permits current and retained at facility	2712 (j), 25284(a), 2712(i)	X			
307	Continuous monitoring system certified annually	2630(d), 2641(j)	X			
308	Secondary containment tested as required	2637(a), 25284.1	X			
309	Releases reported/recorded	2651, 2652, 25294	X			
310	Maintenance and monitoring records available	2712(b)	X			

UST SYSTEM INSPECTION		Tank ID				
Item	Description	Code Sections	1	2	3	4
311	Alarm status is normal/Alarm history available	2632(e), 25293				
312	Audible and visual alarms are functioning properly	2632(c)(2)(B), 2636(f)(1)		X		
313	Sticker/tag affixed to monitoring equipment at certification	2637(b)(6)	X			
314	UST system has approved overflow protection	2635(b)(2)	X			
315	Spill container in good condition and liquid free	2635(b)(1)	X			
316	Spill container drain appears functional or alternative available	2635(a)(1)(C)	X			
317	All containment sumps liquid free/good condition	2631(c)(4), 25292.1	X			
318	Secondary containment system drained to monitored sump	2636(c)(1), 2636(f)	X			
319	Sensors placed at low point in all sumps	2630(d), 25299(a)(9)		X		
320	Under dispenser containment present	2636(h)(1)	X			
321	Under dispenser containment monitored	2636(i)(1)	X			
322	Contractor/CMD Technician trained	2637(b)(1)(2)				

MONITORING OPTIONS FOR PRESSURIZED SYSTEMS		Tank ID				
Item	Description	Code Sections	1	2	3	4
OPTION 1						
323	Continuous audible and visual alarm or stops flow of product at dispenser	2636 (f)(1)				
324	Shut down the turbine when a leak is detected	2636 (f)(3), 2636 (g)(1)-(4)				
325	Turbine shuts off when monitor is disconnected or fails	2636 (g) (1)-(4)				
OPTION 2						
326	Continuous audible and visual alarm or stops flow of product at dispenser	2636 (f)(1)				
327	Shut down the turbine when a leak is detected	2636 (f)(3)				
328	Annual pipeline integrity test detects 1gph at 150% of operating pressure	2636 (f)(4)				
OPTION 3						
329	Continuous audible and visual alarm or stops flow of product at dispenser	2636 (f)(1)				
330	Line leak detector detects 3.0 gph or equivalent and is certified annually	2636 (f)(2), 2637 (b)				
331	Annual pipeline integrity test detects 1gph at 150% of operating pressure	2636 (f)(4)				
OPTION 4 - Emergency Generators with Pressurized Piping						
332	Continuous audible and visual alarm	2636 (f)(1)				
333	Line leak detector detects 3.0 gph or equivalent and is certified annually	2636 (f)(2), 2637 (b)				
334	Monitoring system checked daily	2636(g), 2636(f)(4)				
OPTION 5 - Double Wall Suction Gravity Remote						
335	Continuous audible and visual alarm or stops flow of product at dispenser	2636(f)(1)				

1. No audible or visual Alarm functioning. This was written up in 2002 and certified in Oct 2002.

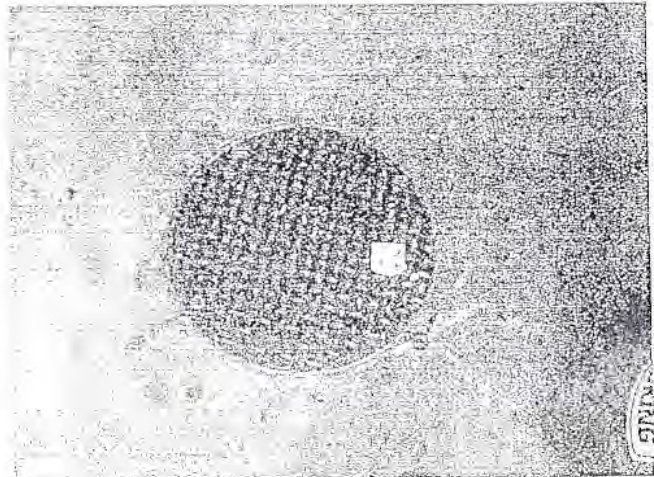
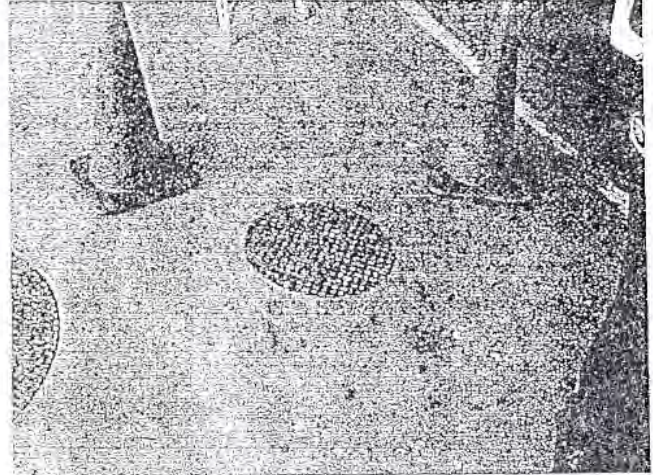
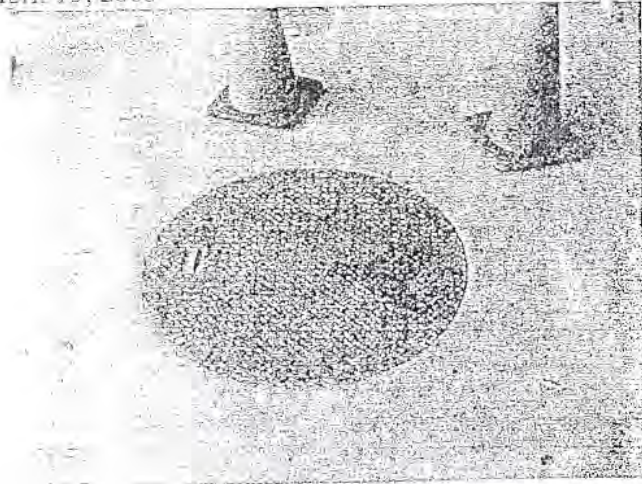
2. Need to lower sensors to lowest point. Need to correct Audible & Visual Alarm within 5 working days.

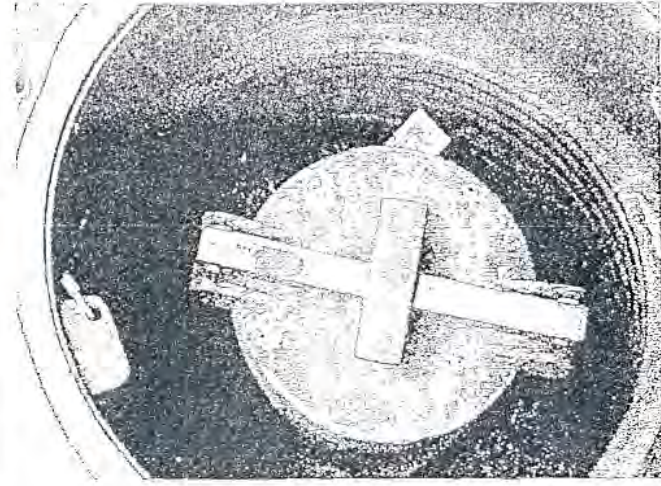
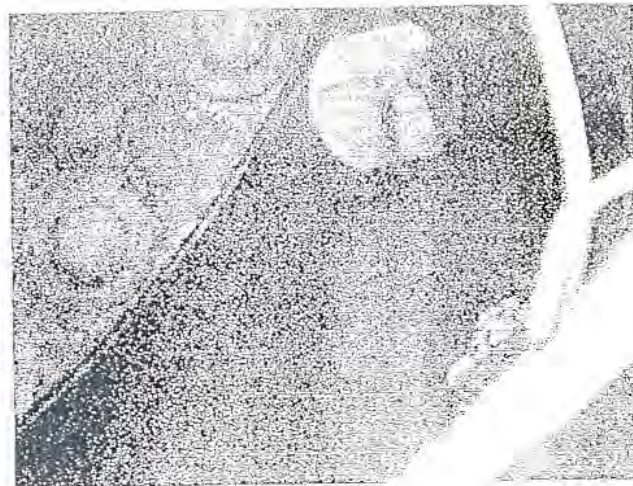
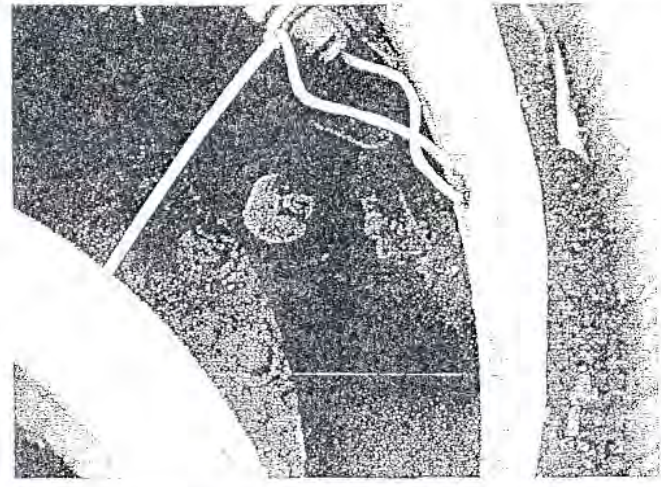
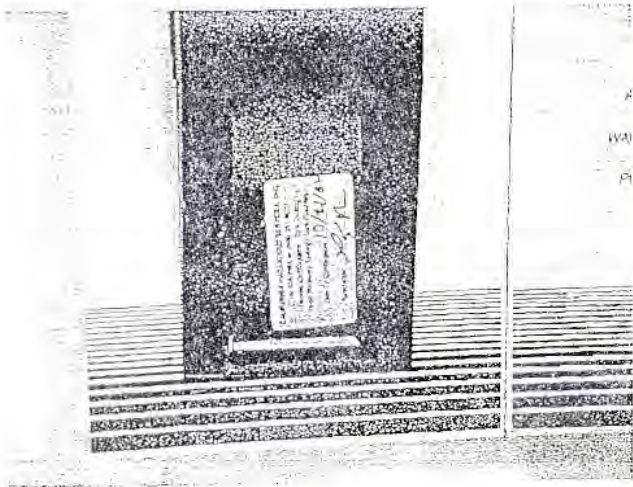
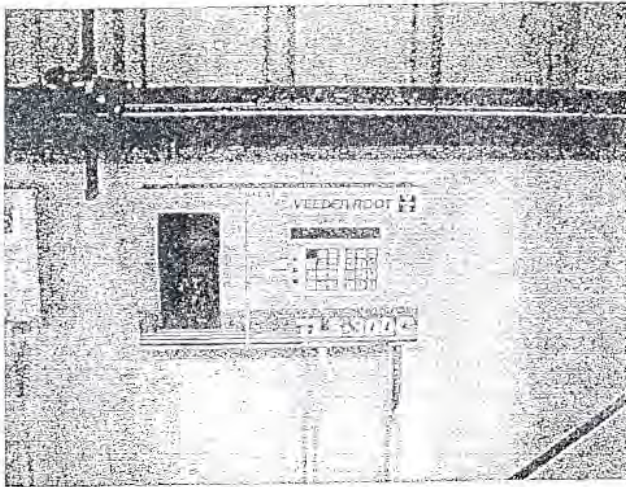
NOTICE OF VIOLATION: The Violations noted above must be corrected within 30 days. Failure to comply may result in legal action.

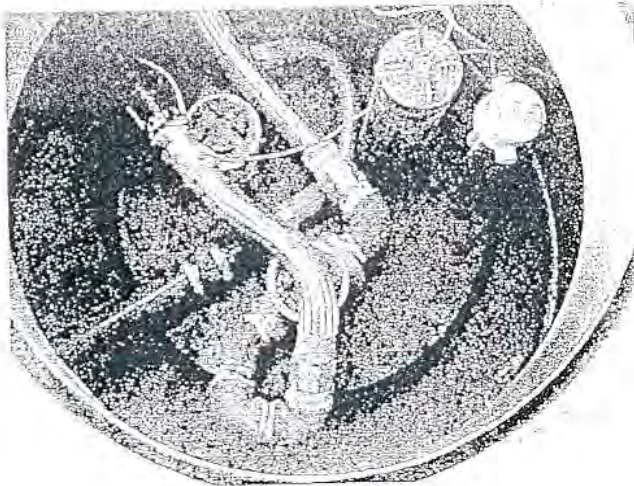
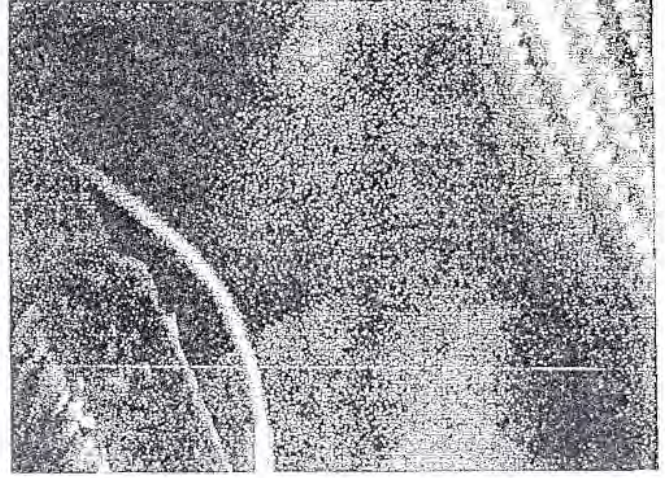
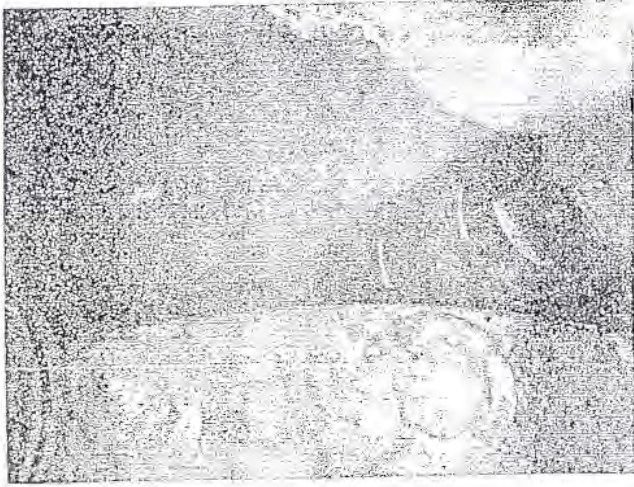
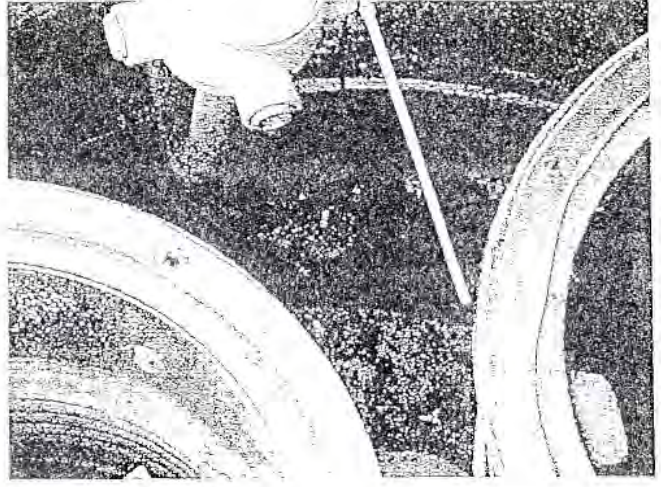
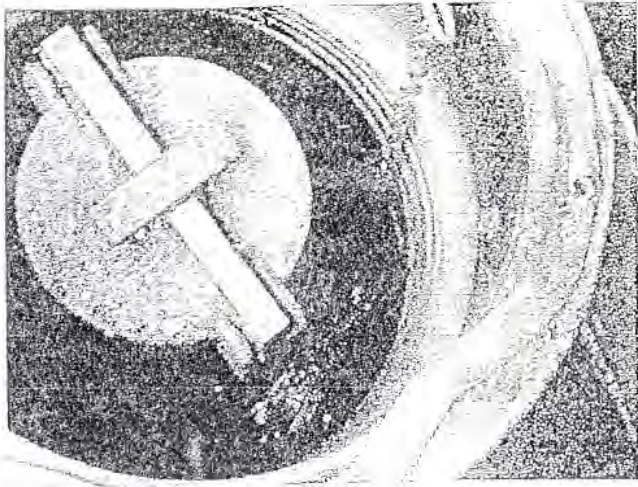
Specialist	<i>P. M. Tchen</i>	Received by	<i>[Signature]</i>	Title	Sen. Env. Eng.
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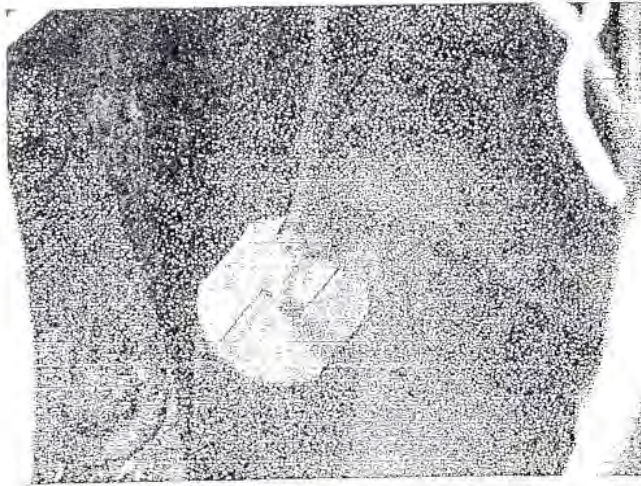
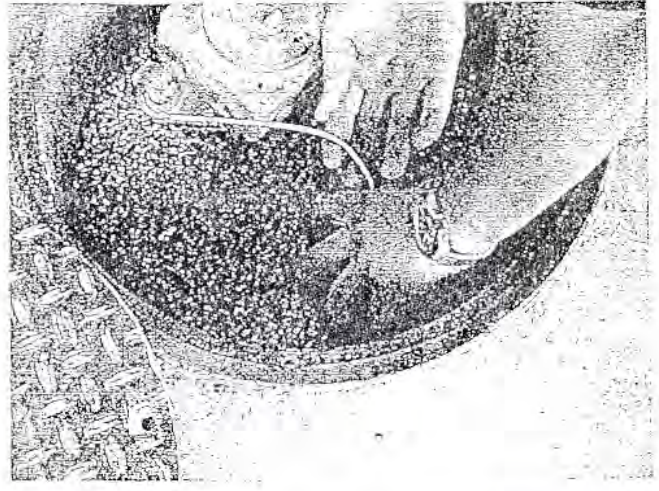
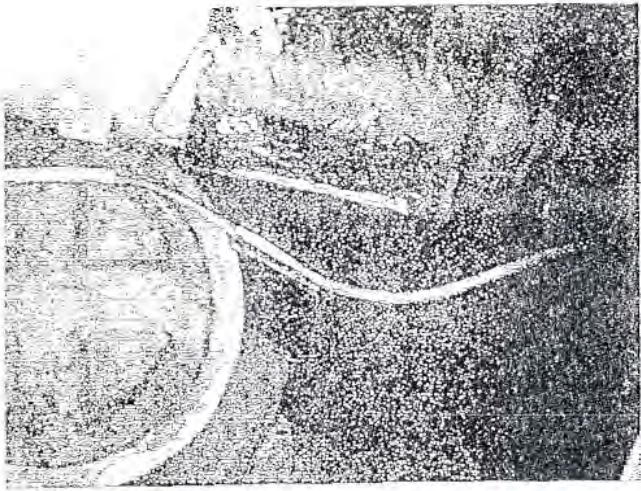
National RV
3411 North Perris Blvd.
Perris

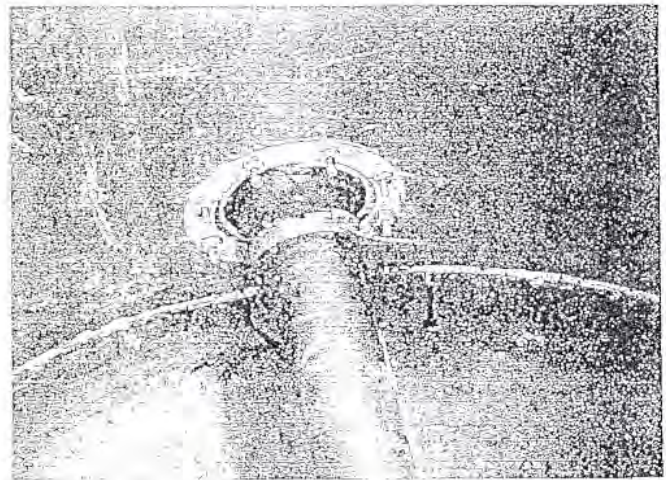
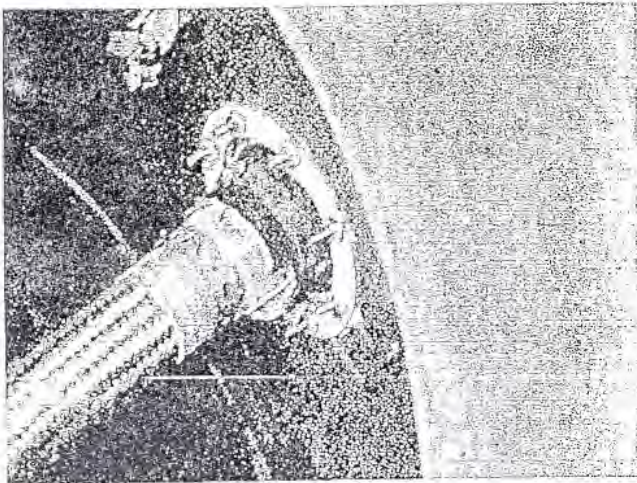
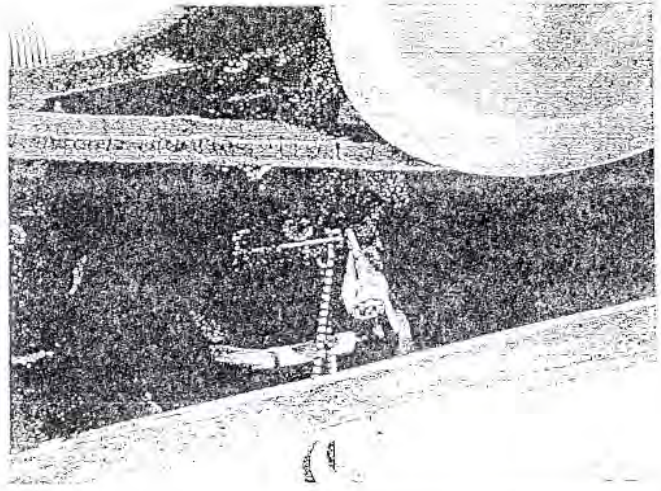
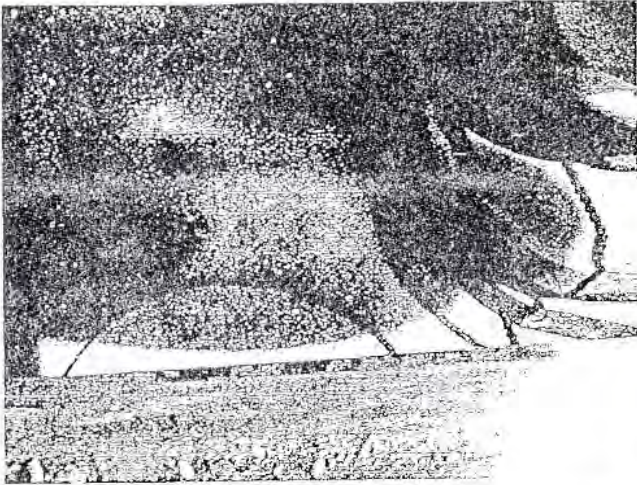
April 15, 2003



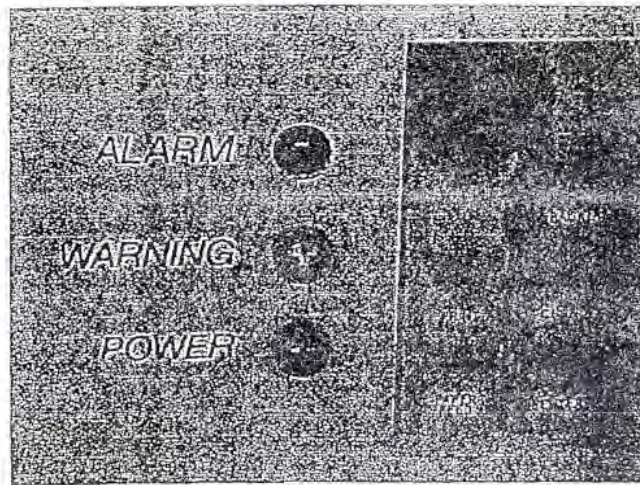








CALIFORNIA HAZARDOUS SERVICES, INC.
 (714) 434-9995 or (408) 261-0522
 Monitor Certifications • Tank Testing •
 Vapor Recovery Testing • Tank Cleaning •
 Date Of Certification: 10/21/62
 Technician: *[Signature]*



This inspection was conducted as part of the SB 989 testing.

Both of the sensors in the sumps were hanging above the underground storage tank (UST). A manway is in each sump and the sensors were a lined with the central manways. This positioning of the sensors does not meet: 1 the lowest point with in a sump where a liquid will collect. 2 Earliest possible leak detection.

The Hazardous Materials Management Division (Division) has required from the first use of sensors that they be placed in the low point of the saddle touching the UST top. It has become common for monitoring installations to have a PVC tube placed in the sump at the best point for detection and the sensor placed/secured into this PVC tube.

It appeared from inspection of the product sump might have leaks as visual cracks were seen upon inspection. Tanknology's crew planned to go head with the SB 989 testing. The inside of the product sump had a large amount of small pea gravel inside of the sump. It was questioned as to how this pea gravel came to be inside of the sump.

Both sumps have a great amount of rusting. This should be stabilized by removal of the rust coat and coating the steel with a rust preventative coating.

I noted that the monitoring system did not have an audio and visual alarm system that is working. This was noted in my Oct. 2002 inspection. The monitoring system was certified by California Hazardous Services, Inc. on Oct. 21, 2002. California Hazardous Services, Inc. has been working on this UST several time between the certification and today's testing. It would appear that they had tied the sensors up above the UST top and away from the lowest point.

County of Riverside
Department of Environmental Health
Hazardous Materials Management Division

Enforcement Panel Referral

To: The Enforcement Panel

Date: April 21, 2003

From: Paul Mitchell, HMMS III
Hemet Office

Re: Request for Enforcement Action

It is requested that you convene the Enforcement Panel for review of a potential enforcement action against: National RV
3411 North Perris Blvd.
Perris

The following underground storage tank (UST) violations were found: (See attached copies of the Underground Storage Tank Inspection forms and other information)

- Failure to properly monitor an UST system
- Failure to properly operate an UST system
- Sensors raised – possible tampering
- Historic violations of a similar nature

Most recent inspection report, previous inspection report and other pertinent information are attached.



Certified Unified Program Agency
County of Riverside Community Health Agency
Department of Environmental Health
Hazardous Materials Management Division

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Page ___ of ___ pages

SUPPLEMENTAL REPORT

Reference Date Apr 23, 2003

Name National R.V.

Address 3411 North Perris, Blvd, Perris

Re: Reinspection

Facility # _____

Remarks:

The audio and visual Alarms were Check and Not
functional. The repairs are to be completed by April 28 2003

Specialist

Paul Mitchell

Received By

Jeffery X. Smith 4-23-03



Certified Unified Program Agency
County of Riverside Community Health Agency
Department of Environmental Health
Hazardous Materials Management Division

1

Page ___ of ___ pages

SUPPLEMENTAL REPORT

Reference Date Apr 29 2003

Name National R U

Address 3411 North Paris Blvd Paris

Re: Reinspection UST Facility # _____

Remarks: Audio and Visual Alarms are working on UST Monitoring SYSTEM. SYSTEM now has Remote Alarm.

Specialist P. Mitchell

Received By Jm Mayhew



**COUNTY OF RIVERSIDE HEALTH SERVICES AGENCY
DEPARTMENT OF ENVIRONMENTAL HEALTH
UNDERGROUND STORAGE TANK PLAN CHECK APPLICATION**

Plan Check Number

03-334

Application for review of underground storage tank installation, upgrade, modification and/or repair plans. Applicant is to submit four complete sets of plans with an attached material/equipment list for each construction site. All fees are payable at the time the plans are submitted with this application.

FACILITY NAME <u>National RV</u>	FACILITY ADDRESS <u>3411 N Harris Blvd Pacois CA 92571</u>	PHONE # <u>Jhon Morgan</u> <u>909) 318 5629</u>
NAME OF OWNER	ADDRESS OF OWNER	PHONE #
NAME OF OPERATOR	ADDRESS OF OPERATOR	PHONE #
NAME OF CONTRACTOR <u>HCI Environmental</u>	ADDRESS OF CONTRACTOR <u>1787 W. Pomona Rd. Corona</u>	PHONE # <u>909) 280-0298</u>
NAME OF ENGINEER / ARCHITECT	ADDRESS OF ENGINEER / ARCHITECT	PHONE #

SCOPE OF WORK: (CHECK ALL THAT APPLY)

<input type="checkbox"/> NEW INSTALLATION <u>or</u>	
<input type="checkbox"/> UPGRADE	
<input checked="" type="checkbox"/> INSTALLATION OF DISPENSER CONTAINMENT.	<input type="checkbox"/> INSTALLATION OF OVERFILL PROTECTION.
<input checked="" type="checkbox"/> INSTALLATION OF DOUBLE-WALL PIPING.	<input type="checkbox"/> INSTALLATION OF SPILL CONTAINMENT.
<input type="checkbox"/> INSTALLATION OF SUMP AROUND TURBINE.	<input type="checkbox"/> INSTALLATION OF STRIKER PLATES BENEATH TANK OPENINGS.
<input checked="" type="checkbox"/> INSTALLATION OF ELECTRONIC IN-LINE LEAK DETECTOR WITH POSITIVE SHUT-DOWN OF TURBINE.	<input type="checkbox"/> INSTALLATION OF LINING OR BLADDER.
	<input type="checkbox"/> INSTALLATION OF CATHODIC PROTECTION SYSTEM
<input checked="" type="checkbox"/> MODIFICATION	<input type="checkbox"/> REPAIR

SITE INFORMATION :

NUMBER OF TANK SYSTEMS <u>1</u>	CONTENTS OF TANK(S) <u>Regular Fuel</u>	TYPE OF MONITORING
ESTIMATED CONSTRUCTION START DATE <u>8-11-03</u>	ESTIMATED CONSTRUCTION COMPLETION DATE <u>8-25-03 9-1-03</u>	
APPLICANT NAME (PRINT) <u>Steve DeLuco</u>	APPLICANT SIGNATURE <u>[Signature]</u>	DATE <u>8-5-03</u>

*PLEASE MAKE CHECK PAYABLE TO COUNTY OF RIVERSIDE

FOR OFFICE USE ONLY

Amount Attached \$ Le84. — FACILITY # 82241
Transaction No. A1657194
check # 16110

COUNTY OF RIVERSIDE HEALTH SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS MANAGEMENT DIVISION
Underground Storage Tank Official Inspection Report

FACILITY NAME National RV FACILITY I.D. NUMBER _____
 FACILITY ADDRESS 3411 West Paris CITY Paris ZIP CODE _____
 INSPECTION DATE Oct 21, 2003
 TIME IN _____ TIME OUT _____
 INSPECTION TYPE: Routine Follow-up

ID# _____ Mon Opt _____ Product <u>Gas</u> Inst Dt _____ Size <u>8K</u>	ID# _____ Mon Opt _____ Product _____ Inst Dt _____ Size _____	ID# _____ Mon Opt _____ Product _____ Inst Dt _____ Size _____
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H&SC = Health & Safety Code 23 CCR = California Code of Regulations, Title 23

YES	NO	N/A	YES	NO	N/A	YES	NO	N/A
-----	----	-----	-----	----	-----	-----	----	-----

VIOLATIONS

1. Application for a "Permit to Operate" Submitted								
a. Form A & B Submitted (H&SC 25286)	X							
b. Form C Submitted (23 CCR 2635(d))	X							
2. Submitted UST Fees								
a. Operating Fees (H&SC 25287(a))	X							
b. State Surcharge (H&SC 25287(b))	X							
3. Approved Monitoring Alternative Application Submitted (H&SC 25291, 25292)	X							
a. Unauthorized Release Response Plan Submitted (23 CCR 2632(d), 2634(e), 2641(h))	X							
b. Integrity Testing:								
1. UST Integrity Tested (H&SC 25292(b)(1))	X							
2. Pipeline Integrity Tested (H&SC 25291(f))	X							
3. Tests Submitted Within 30 Days (23 CCR 2643(g))	X							
c. On-line Leak Detection Installed (H&SC 25292(b)(4)(c))				X				
d. Annual On-line Leak Detection Test Submitted (H&SC 25292(b)(4)(C))				X				
e. Inventory Reconciliation:								
1. Monthly Inventory Reconciliation (23 CCR 2646)			X					
2. Annual Inventory Reconciliation (23 CCR 2646(g))			X					
3. Meters Calibrated Annually (23 CCR 2646(i))			X					
f. Continuous Monitoring Device Operable (23 CCR 2641(j), 2630(d))	X							
g. Daily Monitoring of Suction Product Line (23 CCR 2641(c))	X							
h. Written Records Maintained On Site (H&SC 25293(a), 23 CCR 2712(b))	X							
4. UST System Monitored According To Conditions Of Permit (H&SC 25293)	X							
5. UST Operated with Permit (H&SC 25284(a))	X							
6. Written Contract Exists Between Owner & Operator To Monitor UST (H&SC 25293(b))				X				
7. Reported Changes In Usage/Conditions To Operate/Monitoring Alternative Procedures of UST System Within 30 Days (23 CCR 2712, 2711(b))				X				
8. Reported Change in Ownership Within 30 Days (23 CCR 2712(d))				X				
9. Statement Of Financial Responsibility Submitted (H&SC 25292.2(a))	X							
10. Reported Unauthorized Release Within 24 Hours (H&SC 25294, 25295)	X							
11. Approved UST System Repairs (23 CCR 2661)	X							
12. Secured Monitoring Wells (23 CCR 2649(d)(9))								
13. Other								

The monitoring system did not have an audio alarm that could be heard from 15 feet away. This needs to be heard by the employees within the area.
 Need to correct the rusting of the steel items within the tank will be starting inventory reconciliation as soon as they get a measuring stick for volume.

RECHECK DATE: Oct. 2003 RECEIVED BY: [Signature] 10-21-03

RIVERSIDE MEMET INDIO
 INSPECTOR: Paul Mitchell

OFFICE TELEPHONE NO.: _____
 DISTRIBUTION: WHITE—Office Copy; CANARY—Owner/Operator; PINK—Specialist

COUNTY OF RIVERSIDE HEALTH SERVICES AGENCY
 DEPARTMENT OF ENVIRONMENTAL HEALTH
 HAZARDOUS MATERIALS MANAGEMENT BRANCH

Underground Storage Tank Installation Inspection

Name/DBA National R.V. Plan Check No. 03-334
 Address 3411 North Perris Blvd City Perris
 Contractor Name HCE Telephone (800) 988-4424
 Number of UST(s) Installed _____ Type of Tank(s) _____

	YES	NO	N/A
1. SETTING OF UST(S)			
A. Approved plans on site.	<input type="checkbox"/>	<input type="checkbox"/>	
B. UST(s) type indicated on approved plans.	<input type="checkbox"/>	<input type="checkbox"/>	
C. UST(s) arrived on site with vacuum or holiday test.	<input type="checkbox"/>	<input type="checkbox"/>	
D. Approved backfill used.	<input type="checkbox"/>	<input type="checkbox"/>	
E. Distance between UST(s) as per manufacture's specifications.	<input type="checkbox"/>	<input type="checkbox"/>	
F. Letter stating B, C, D, and E, from contractor.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	DATE: _____		
2. PRIMARY PIPING			
A. California Forms A, B, and C issued.	<input type="checkbox"/>	<input type="checkbox"/>	
B. All piping sloped back to UST.	<input type="checkbox"/>	<input type="checkbox"/>	
C. All lines tested hydrostatically at 150%, or pneumatically at 110% of designed operating pressure for a minimum of 30 minutes.	<input type="checkbox"/>	<input type="checkbox"/>	
D. All joints soaped and checked.	<input type="checkbox"/>	<input type="checkbox"/>	
E. All connections to stationary objects consist of approved flexible connectors.	<input type="checkbox"/>	<input type="checkbox"/>	
F. Manifolder vapor to leaded regular UST.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	DATE: _____		
3. SECONDARY CONTAINMENT			
A. Approved secondary containment in place to grade.	<input type="checkbox"/>	<input type="checkbox"/>	
B. Secondary containment system tested as per manufacturers specifications.	<input type="checkbox"/>	<input type="checkbox"/>	
C. Containment drained into a monitored sump.	<input type="checkbox"/>	<input type="checkbox"/>	
D. All exposed steel double wrapped (10 mil).	<input type="checkbox"/>	<input type="checkbox"/>	
E. Impact valves present and secured.	<input type="checkbox"/>	<input type="checkbox"/>	
F. Secondary containment for suction system.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	DATE: _____		
4. FINAL INSPECTION			
A. Valid UST integrity test submitted.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
B. Electronic monitor in place and operational	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
C. Operational probes in annular(s) and sump(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
D. Operational leak detectors or turbines.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
E. Approved spill catchment basin in place.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
F. Corrosion protection in place and operational.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
G. Overfill protection for positive shut-off or flow restrictions. <i>filed.</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
H. Unauthorized release response plan submitted.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
I. Evidence of financial responsibility submitted.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
J. Fill pipes and monitoring well(s) labeled.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
K. All projections into manway(s) / sump(s) sealed	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
L. Forms A, B, and C completed and submitted.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	DATE: <u>Oct 30 2003</u>		

Need to submit state forms B&C with wet ink signatures. Can submit Fax until wet ink arrives. Will need integrity test report. The above will complete the final inspection.

INSPECTOR: Paul M. Johnson RECEIVED BY: [Signature]

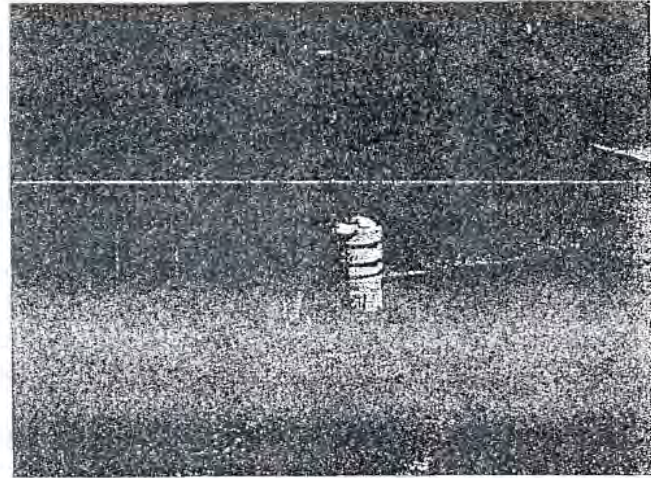
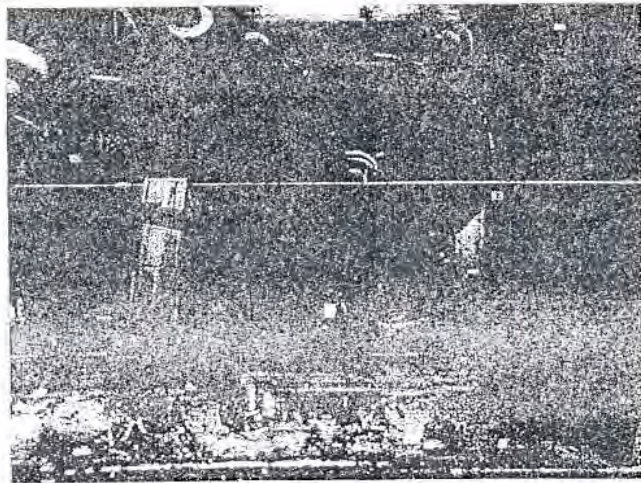
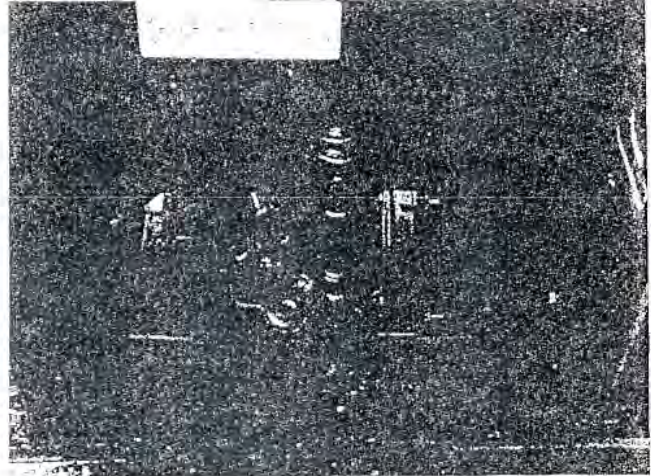
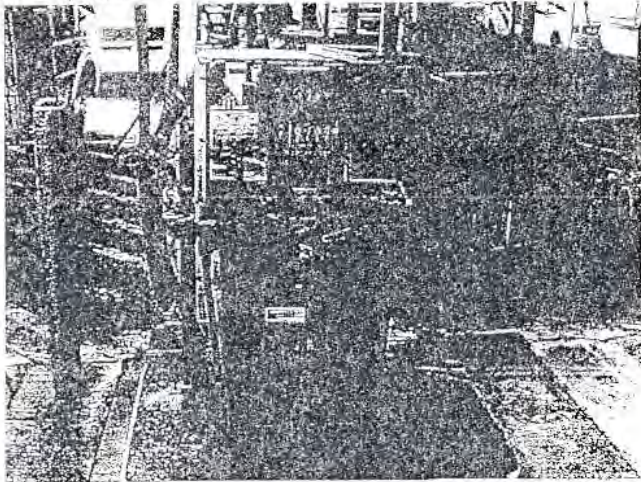
Riverside Office
 P.O. Box 7600
 Riverside, CA 92513-7600
 (714) 358-5055

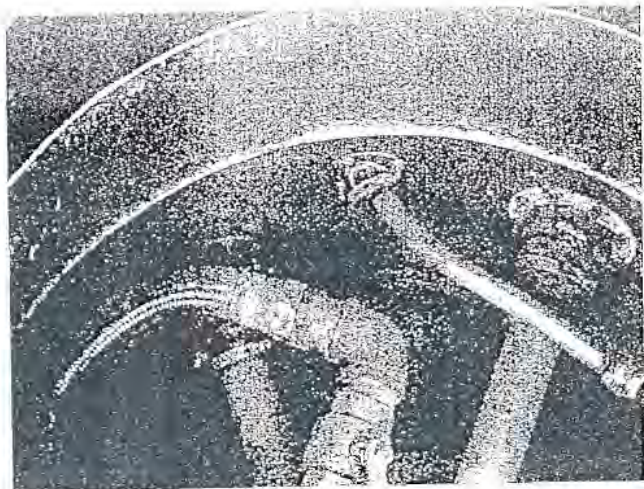
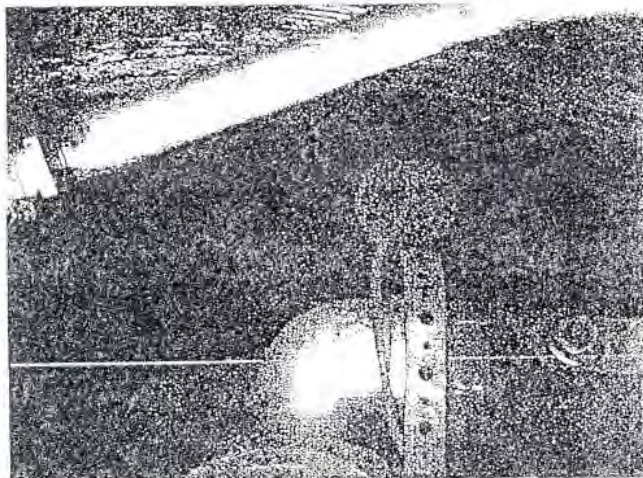
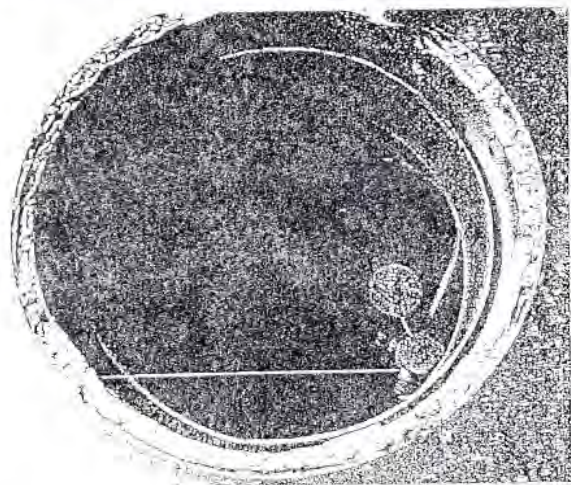
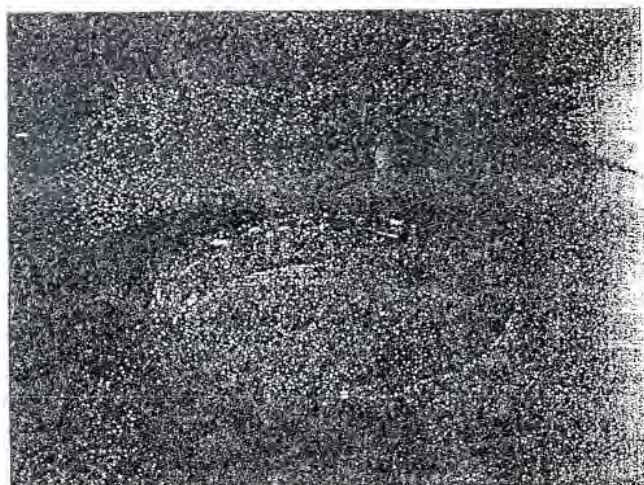
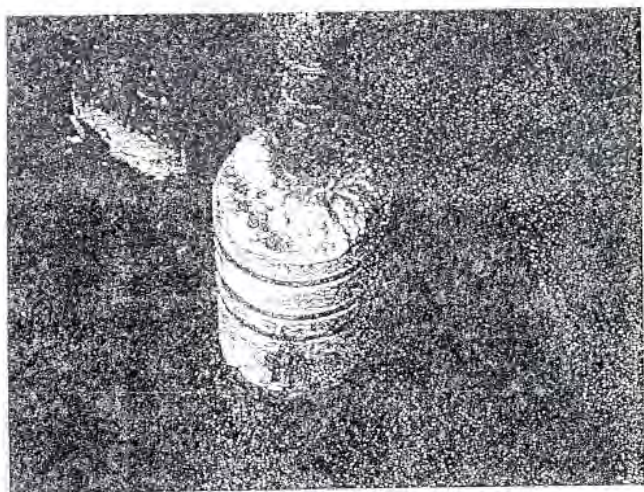
Indio Office
 46209 Oasis Street, Room 203
 Indio, CA 92201
 (619) 863-8976

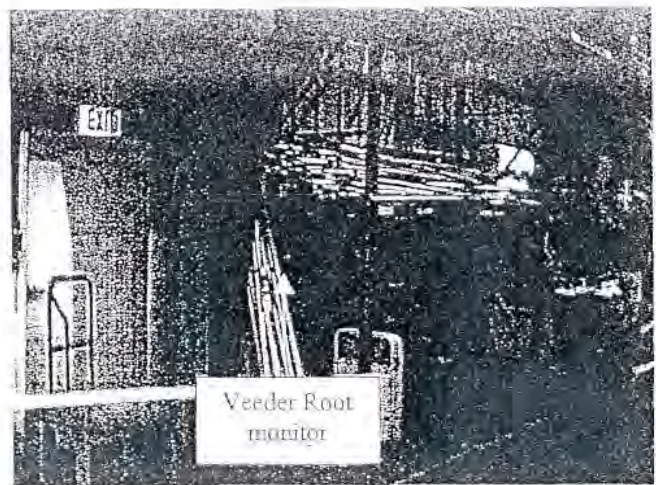
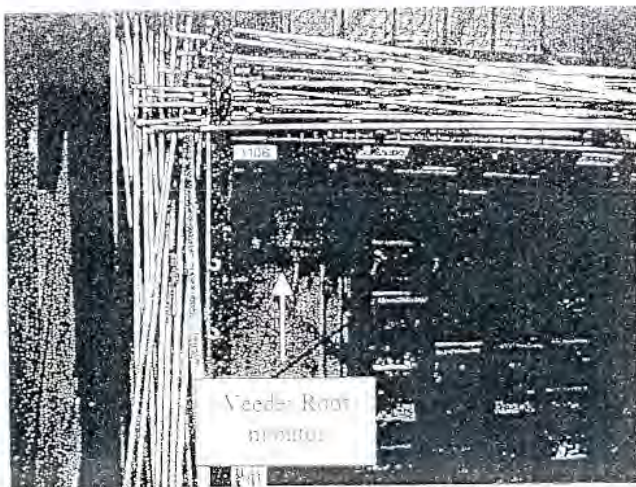
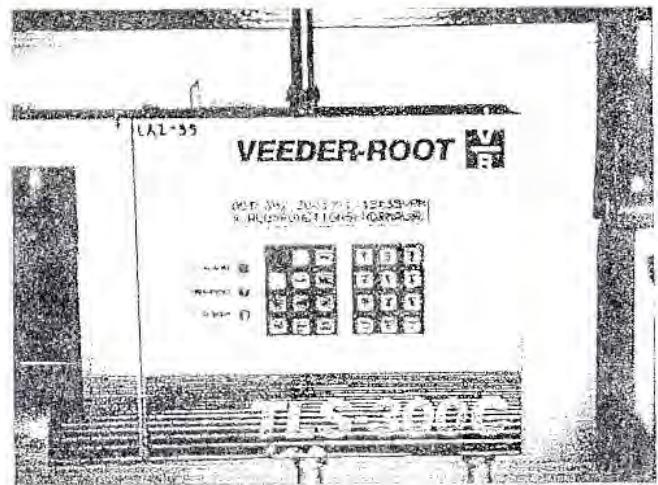
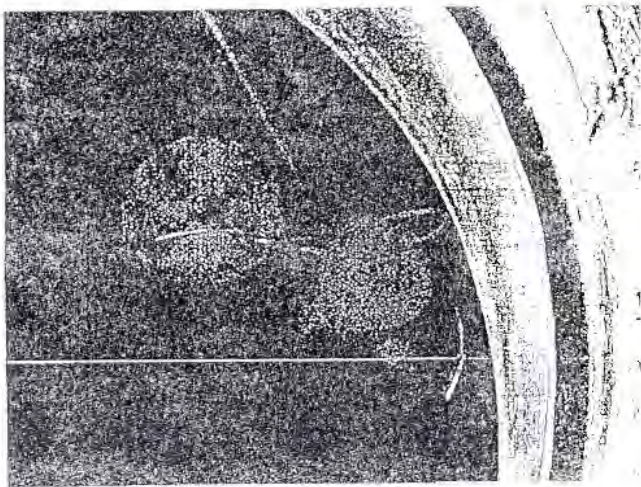
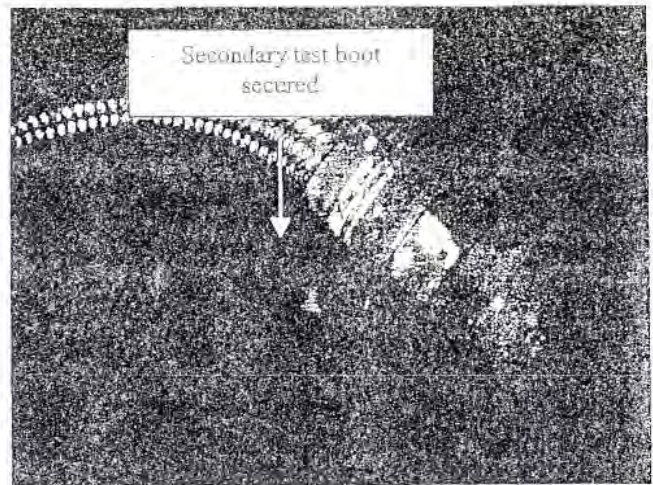
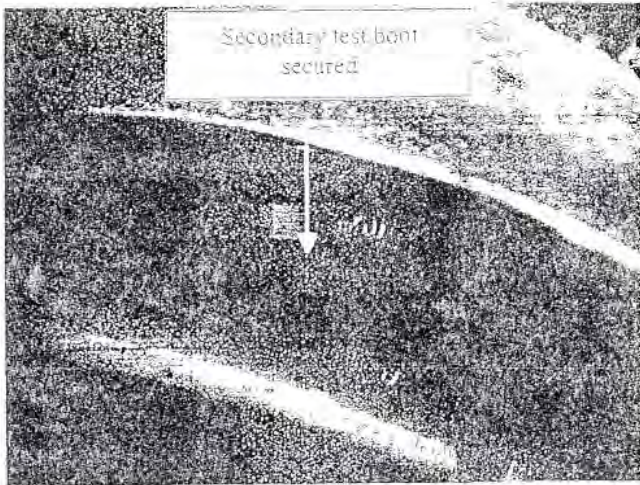
B

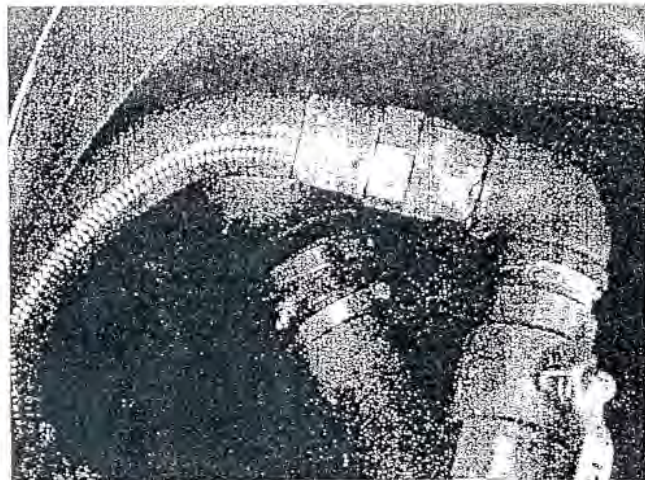
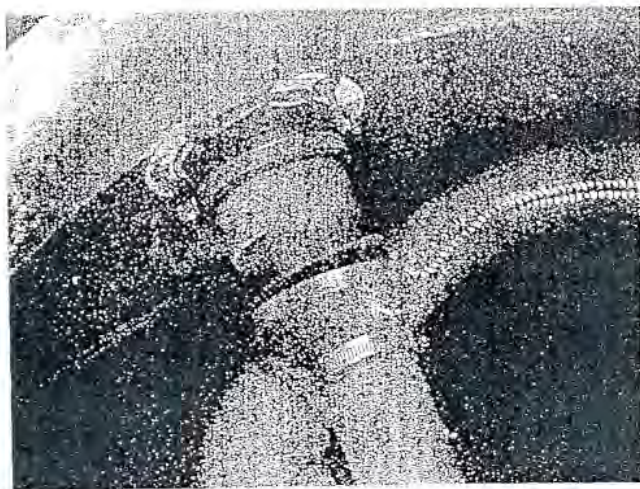
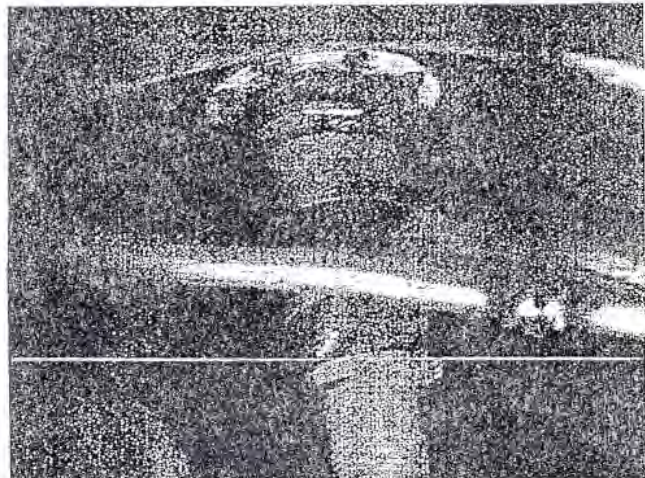
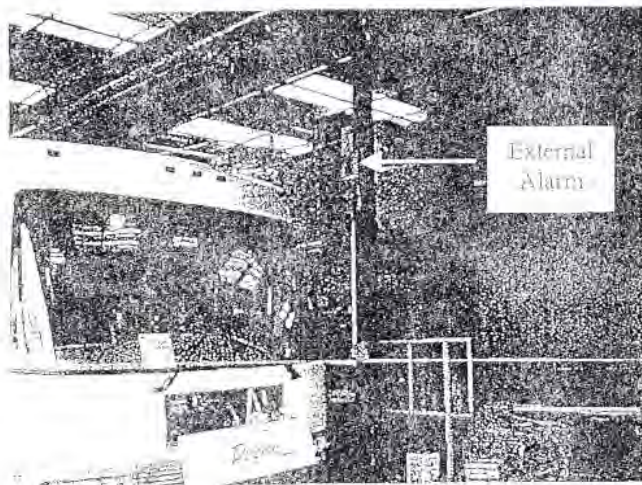
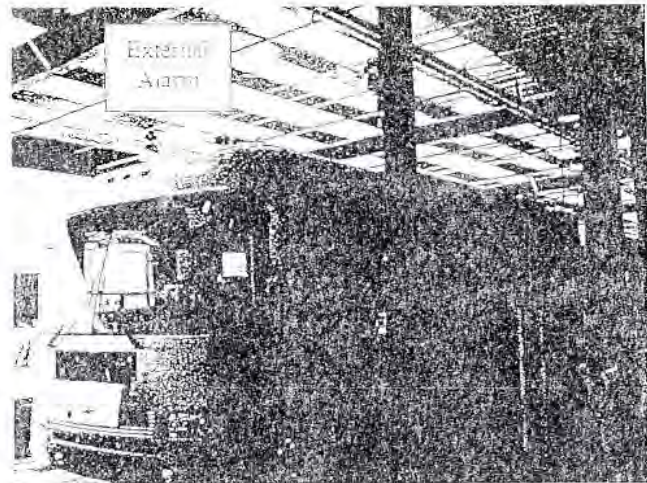
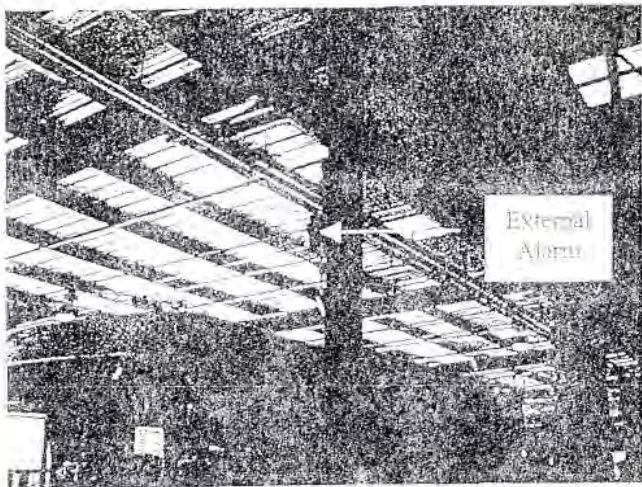
National RV
3411 North Perris Blvd.
Perris

Oct. 30, 2003









This was the final inspection for this installation of a new vapors recovery line and a new vent pipe. Both of these lines were originally single walled pipe and replaced with a double wall pipe. The shear value was

installed correctly to the base of the dispenser. The vent pipe as it rose above the concrete slab with through a large PVC pipe filled with foam. A portal was installed in the PVC pipe to allow the secondary pipe to be tested in the future. Inside of the sumps the secondary test boots were still connected to the primary and secondary pipe. This provided a seal for the secondary pipe. I required these boots be position onto the primary pipe and disconnected from the secondary pipe. This was done as shown in the above photographs.

I did inspect the Veeder Root monitoring system. The monitoring panel is located under a shelf inside of the building and is partially block from view. This can be seen in the photographs above. The remote alarm is seen in the photographs in the area near the location of the UST.

The state forms and the integrity test for the newly installed lines were not available. Once the Hemet office receives copies of these forms the UST may be operated. A wet ink signature copy of the state forms is required for the Division to have on file.

Talked with Greg Hansen
and Releago UST.

Awaiting wet ink signature
documents for filing
PRM 10-4-03



HCI ENVIRONMENTAL & ENGINEERING SERVICE
A - GENERAL ENGINEERING STATE CONTRACTORS LICENSE NUMBER 788216
"Committed to Providing Quality Products and Services"
www.HCIEnv.com

FAX COVER SHEET

Date: October 31, 2003

Pages including coversheet: 7

Company: County of Riverside Environmental Health HMD

Attention: Paul Mitchell

Phone: 909-766-6524

Fax: 909-766-7874

From: HCI Environmental & Engineering Service
Craig Shaffer
Office: 909-280-0298
Fax: 909-280-0118

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As discussed at National RV on October 30, 2003 at ~1230, this fax completes the final requirements for the UST upgrades and fuel will begin to be dispensed on November 3, 2003.

Please call me with comments or concerns at 909-532-9027.
Thank you, Craig



So. California
Los Angeles Metro
(Corporate Office)
1757 W. Pomona Rd., Ste. A
Corona, Ca 92850
800.968.4424
909.280.0118 Fax

No. California
Sacramento Metro
915 L. Street, Ste. C
Sacramento, Ca 95814
800.968.4424
916.444.3204 Fax

Nevada
Las Vegas Metro
101 S. Rainbow Blvd
Las Vegas, NV 89128
800.968.4424
702.221.2711 Fax



STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
UNDERGROUND STORAGE TANK PERMIT APPLICATION - FORM B



COMPLETE A SEPARATE FORM FOR EACH TANK SYSTEM.

MARK ONLY ONE ITEM 1 NEW PERMIT 2 INTERIM PERMIT 3 RENEWAL PERMIT 4 AMENDED PERMIT 5 CHANGE OF INFORMATION 6 TEMPORARY TANK CLOSURE 7 PERMANENTLY CLOSED ON SITE 8 TANK REMOVED

DBA OR FACILITY NAME WHERE TANK IS INSTALLED:

I. TANK DESCRIPTION COMPLETE ALL ITEMS - SPECIFY IF UNKNOWN
 A. OWNER'S TANK I.D. # 01 B. MANUFACTURED BY: XERVES
 C. DATE INSTALLED (MO/DAY/YEAR) 1989 D. TANK CAPACITY IN GALLONS: 8,000

II. TANK CONTENTS IF A-1 IS MARKED, COMPLETE ITEM C.
 A. 1 MOTOR VEHICLE FUEL 4 OIL 1 PRODUCT 1A REGULAR UNLEADED 3 DIESEL 6 AVIATION GAS
 2 PETROLEUM 5 EMPTY 2 WASTE 1B PREMIUM UNLEADED 4 GASOLIN 7 METHANOL
 3 CHEMICAL PRODUCT 6 UNKNOWN 3 JET FUEL 8 MSO
 9 LEADED 99 OTHER (DESCRIBE IN ITEM D, BELOW)
 D. IF (A-1) IS NOT MARKED, ENTER NAME OF SUBSTANCE STORED C.A.S.#:

III. TANK CONSTRUCTION MARK ONE ITEM ONLY IN BOXES A, B, AND C, AND ALL THAT APPLIES IN BOX D AND E.
 A. TYPE OF SYSTEM 1 DOUBLE WALL 3 SINGLE WALL WITH EXTERIOR LINER 5 INTERNAL BLANKET SYSTEM 99 UNKNOWN
 2 SINGLE WALL 4 SINGLE WALL IN A VAULT 99 OTHER
 B. TANK MATERIAL (Primary Tank) 1 BARE STEEL 2 STAINLESS STEEL 3 FIBERGLASS 4 STEEL CLAD W/ FIBERGLASS REINFORCED PLASTIC
 5 CONCRETE 6 POLYVINYL CHLORIDE 7 ALUMINUM 8 100% METHANOL COMPATIBLE WRAP
 9 BRONZE 10 GALVANIZED STEEL 95 UNKNOWN 99 OTHER
 C. INTERIOR LINING OR COATING 1 RUBBER LINED 2 ALKYD LINING 3 EPOXY LINING 4 PHENOLIC LINING
 5 GLASS LINING 6 UNLINED 95 UNKNOWN 99 OTHER
 D. EXTERIOR CORROSION PROTECTION 1 POLYETHYLENE WRAP 2 COATING 3 VINYL WRAP 4 FIBERGLASS REINFORCED PLASTIC
 5 CATHODIC PROTECTION 6 NONE 95 UNKNOWN 99 OTHER
 E. SPILL AND OVERFILL, etc. SPILL CONTAINMENT INSTALLED (YEAR) 2000 OVERFILL PREVENTION EQUIPMENT INSTALLED (YEAR) 2000
 DROP TUBES YES NO STRIKER PLATE YES NO DISPENSER CONTAINMENT YES NO

IV. PIPING INFORMATION CIRCLE A IF ABOVE GROUND OR U IF UNDERGROUND, BOTH IF APPLICABLE
 A. SYSTEM TYPE (A)U 1 Suction A U 2 PRESSURE A U 3 GRAVITY A U 4 FLEXIBLE PIPING A U 99 OTHER
 B. CONSTRUCTION A U 1 SINGLE WALL A U 2 DOUBLE WALL A U 3 LINED TRENCH A U 95 UNKNOWN A U 99 OTHER
 C. MATERIAL AND CORROSION PROTECTION A U 1 BARE STEEL A U 2 STAINLESS STEEL A U 3 POLYVINYL CHLORIDE (PVC) A U 4 FIBERGLASS PIPE
 A U 5 ALUMINUM A U 6 CONCRETE A U 7 STEEL W/ COATING A U 8 100% METHANOL COMPATIBLE WRAP
 A U 9 GALVANIZED STEEL A U 10 CATHODIC PROTECTION A U 95 UNKNOWN A U 99 OTHER
 D. LEAK DETECTION 1 MECHANICAL LINE LEAK DETECTOR 2 LINE RESISTANCE TESTING 3 CONTINUOUS INTERSTITIAL MONITORING 4 ELECTRONIC LINE LEAK DETECTOR 5 AUTOMATIC TANK TESTING 99 OTHER

V. TANK LEAK DETECTION
 1 VISUAL CHECK 2 MATERIAL INVENTORY RECONCILIATION 3 VAPOR MONITORING 4 AUTOMATIC TANK GAUGING 5 GROUND WATER MONITORING 6 ANNUAL TANK TESTING
 7 CONTINUOUS INTERSTITIAL MONITORING 8 SIP 9 WEEKLY MANUAL TANK GAUGING 10 MONTHLY TANK TESTING 95 UNKNOWN 99 OTHER

VI. TANK CLOSURE INFORMATION (PERMANENT CLOSURE IN PLACE)
 1. ESTIMATED DATE LAST USED (MO/DAY/YR) _____ 2. ESTIMATED QUANTITY OF SUBSTANCE REMAINING _____ GALLONS 3. WAS TANK FILLED WITH INERT MATERIAL? YES NO

THIS FORM HAS BEEN COMPLETED UNDER PENALTY OF PERJURY, AND TO THE BEST OF MY KNOWLEDGE, IS TRUE AND CORRECT

TANK OWNER'S NAME (PRINTED & SIGNATURE) BRAD LEE DATE 10-30-03

LOCAL AGENCY USE ONLY THE STATE I.D. NUMBER IS COMPOSED OF THE FOUR NUMBERS BELOW
 COUNTY # _____ JURISDICTION # _____ FACILITY # _____ TANK # _____
 STATE I.D.# _____
 PERMIT NUMBER _____ PERMIT APPROVED BY/DATE _____ PERMIT EXPIRATION DATE _____

THIS FORM MUST BE ACCOMPANIED BY A PERMIT APPLICATION - FORM A, UNLESS A CURRENT FORM A HAS BEEN FILED. FORM C MUST BE COMPLETED FOR INSTALLATIONS. THIS FORM SHOULD BE ACCOMPANIED BY A PLOT PLAN. FILE THIS FORM WITH THE LOCAL AGENCY IMPLEMENTING THE UNDERGROUND STORAGE TANK REGULATIONS

STATE OF CALIFORNIA
STATE WATER RESOURCES CONTROL BOARD
CERTIFICATION OF COMPLIANCE
FOR UNDERGROUND STORAGE TANK INSTALLATION



FORM C

COMPLETE A SEPARATE FORM FOR EACH TANK SYSTEM

I. SITE LOCATION

STREET 3411 N PERRIS BLVD, 92571
CITY FERRIS COUNTY RIVERSIDE

II. INSTALLATION (mark all that apply):

- The installer has been certified by the tank and piping manufacturers.
- The installation has been inspected and certified by a registered professional engineer.
- The installation has been inspected and approved by the implementing agency.
- All work listed on the manufacturer's installation checklist has been completed.
- The installation Contractor has been certified and licensed by the Contractors State License Board.
- Another method was used as allowed by the implementing agency. (Please specify.)

III. OATH I certify that the information provided is true to the best of my belief and knowledge.

Tank Owner/Agent [Signature] Date 10-30-03
Print Name CRAIG SHAFER Phone (909) 280-0298
Address 1787 W. POMONA RD., STE A, CORONA, CA 92880

LOCAL AGENCY USE ONLY

STATE TANK I.D. #	COUNTY #	JURISDICTION #	FACILITY #	TANK #

Secondary Containment Testing Report Form

This form is intended for use by contractors performing periodic testing of UST secondary containment systems. Use the appropriate pages of this form to report results for all components tested. The completed form, written test procedures, and printouts from tests (if applicable), should be provided to the facility owner/operator for submittal to the local regulatory agency.

1. FACILITY INFORMATION

Facility Name: <u>HCI ENGINEERING/NATIONAL RV</u>	Date of Testing: <u>10-18-03</u>
Facility Address: <u>3411 N. PERRIS BLVD. PERRIS, CA 92571</u>	
Facility Contact:	Phone:
Date Local Agency Was Notified of Testing:	
Name of Local Agency Inspector Present:	

2. TESTING CONTRACTOR INFORMATION

Company Name: <u>TANKNOLOGY</u>		
Technician Conducting Test: <u>WESLEY COUTER</u>		
Credentials: <input checked="" type="checkbox"/> CSLB Licensed Contractor	<input type="checkbox"/> SWRCB Licensed Tank Tester	
License Type and #: <u>TYPE A # 743160</u>		
Training by Manufacturer		
Manufacturer	Component(s)	Date Training Expires

3. SUMMARY OF TEST RESULTS

Number of Tanks Tested: <u>1</u>					Number of Piping Runs Tested: <u>3</u>				
Number of Submersible Pump Sumps Tested: <u>1</u>					Number of UDC Boxes Tested: <u>1</u>				
Number of Fill Sumps Tested: <u>1</u>					Number of Overfill Boxes Tested: <u>2</u>				
Component	Pass	Fail	Not Tested	Repairs Made	Component	Pass	Fail	Not Tested	Repairs Made
<u>UNLEADED TANK INTERST.</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>UNLEADED PRODUCT PIPING SEC.</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>UNLEADED VAPOR REG. " "</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>UNLEADED VENT " "</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>UNLEADED STP SUMP</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>UNLEADED FILL SUMP</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>UNLEADED DISPENSER SUMP</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>UNLEADED FILL SPILL BOX</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<u>UNLEADED VAPOR SPILL BOX</u>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Technician's Signature: 

Date: 10-18-03

SWRCB

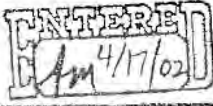
December 2001

6. PIPING SUMP TESTING

Test Method Developed By:	Sump Manufacturer	<input checked="" type="checkbox"/> Industry Standard	Professional Engineer
	Other (Specify)		
Test Method Used:	Pressure	Vacuum	<input checked="" type="checkbox"/> Hydrostatic
	Other (Specify)		
Test Equipment Used:	VPLT		Equipment Resolution:
	Sump #1	U/L	Sump #
Sump Diameter:	42"		
Sump Depth:	42"		
Sump Material:	FIBER		
Height from Tank Top to Top of Highest Piping Penetration:	15.5"		
Height from Tank Top to Lowest Electrical Penetration:	---		
Condition of sump prior to testing:	Good		
Portion of Sump Tested:	19"		
Does turbine shut down when sump sensor detects liquid (both product and water)?	<input checked="" type="radio"/> Yes No NA	Yes No NA	Yes No NA
Turbine shutdown response time			
Is system programmed for fail-safe shutdown?	<input checked="" type="radio"/> Yes No NA	Yes No NA	Yes No NA
Was fail-safe verified to be operational?	Yes No NA	Yes No NA	Yes No NA
Wait time between applying pressure/vacuum/water and starting test:	45 MIN. +		
Test Start Time:	7:49	8:11	
Initial Reading (R _i):	0.000"	0.000"	
Test End Time:	8:05	8:26	
Final Reading (R _f):	+0.0016"	+0.0038"	
Test Duration:	15 MIN.	15 MIN.	
Change in Reading (R _f -R _i):	+0.0016"	+0.0038"	
Pass/Fail Threshold or Criteria:	+/-0.002"	+/-0.002"	+/-0.002"
TEST RESULT:	PASS		
Was sensor removed for testing?	<input checked="" type="radio"/> Yes No NA	Yes No NA	Yes No NA
Was sensor properly replaced and verified functional after testing?	<input checked="" type="radio"/> Yes No NA	Yes No NA	Yes No NA

Comments - (include information on repairs made prior to testing, and recommended follow-up for failed tests)

Level III update
 PMA April 16, 2002



UNIFIED PROGRAM CONSOLIDATED FORM
 FACILITY INFORMATION
 BUSINESS ACTIVITIES

I. FACILITY IDENTIFICATION

FACILITY ID # 82241 EPA ID # (Hazardous Waste Only) CAD981993454

BUSINESS NAME (Same as Facility Name of DBA-Doing Business As)
 NATIONAL RV, INC.

II. ACTIVITIES DECLARATION

NOTE: If you check YES to any part of this list,
 please submit the Business Owner/Operator Identification page (OES Form 2730).

Does your facility...	If Yes, please complete these pages of the UPCF....	
A. HAZARDOUS MATERIALS Have on site (for any purpose) hazardous materials at or above 55 gallons for liquids, 500 pounds for solids, or 200 cubic feet for compressed gases (include liquids in ASTs and USTs); or the applicable Federal threshold quantity for an extremely hazardous substance specified in 40 CFR Part 355, Appendix A or B; or handle radiological materials in quantities for which an emergency plan is required pursuant to 10 CFR Parts 30, 40 or 70?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 4	HAZARDOUS MATERIALS INVENTORY - CHEMICAL DESCRIPTION (OES 2731)
B. UNDERGROUND STORAGE TANKS (USTs) 1. Own or operate underground storage tanks? 2. Intend to upgrade existing or install new USTs? 3. Need to report closing a UST?	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 5 <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 6 <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 7	UST FACILITY (Formerly SWRCB Form A) UST TANK (one page per tank) (Formerly Form B) UST FACILITY UST TANK (one per tank) UST INSTALLATION - CERTIFICATE OF COMPLIANCE (one page per tank) (Formerly Form C) UST TANK (closure portion - one page per tank)
C. ABOVE-GROUND PETROLEUM STORAGE TANKS (ASTs) Own or operate ASTs above these thresholds: - any tank capacity is greater than 660 gallons, or - the total capacity for the facility is greater than 1,320 gallons?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 8	NO FORM REQUIRED TO CUPAS
D. HAZARDOUS WASTE Generate hazardous waste? Recycle more than 100 kg/month of excluded or exempted recyclable materials (per HSC 25343.2)? Treat hazardous waste on site? Treatment subject to financial assurance requirements (for Permit by Rule and Conditional Authorization)? Consolidate hazardous waste generated at a remote site? Need to report the closure/removal of a tank that was classified as hazardous waste and cleaned onsite?	<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO 9 <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 10 <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 11 <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 12 <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 13 <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO 14	EPA ID NUMBER - provide at the top of this page Complete the Hazardous Waste Generator, County of Riverside form. RECYCLABLE MATERIALS REPORT (one per recycle) ONSITE HAZARDOUS WASTE TREATMENT FACILITY (Formerly DTSC Forms 1772) ONSITE HAZARDOUS WASTE TREATMENT - UNIT (one page per unit) (Formerly DTSC Forms 1772 A, B, C, D, and E) CERTIFICATION OF FINANCIAL ASSURANCE (Formerly DTSC Form 1232) REMOTE WASTE / CONSOLIDATION SITE ANNUAL NOTIFICATION (Formerly DTSC Form 1196) HAZARDOUS WASTE TANK CLOSURE CERTIFICATION (Formerly DTSC Form 1249)

LOCAL REQUIREMENTS

11-27-02

**UNIFIED PROGRAM CONSOLIDATED FORM
FACILITY INFORMATION
BUSINESS OWNER/OPERATOR IDENTIFICATION**

Page of

I. IDENTIFICATION

FACILITY ID#										1 BEGINNING DATE 3/28/02002										100 ENDING DATE 3/28/2002										101									
BUSINESS NAME (Same as FACILITY NAME or DBA - Doing Business As)										3 BUSINESS PHONE										102																			
ATIONAL RV, INC.										909/943-6007										103																			
BUSINESS SITE ADDRESS										104										105																			
3411 N. Perris Blvd.										CA										ZIP CODE										105									
PERRIS & BRADSTREET										106										SIC CODE (4 digit #)										107									
										CA										92571										108									
BUSINESS OPERATOR NAME										109										BUSINESS OPERATOR PHONE										110									
ational RV																				909/943-6007																			

II. BUSINESS OWNER

OWNER NAME										111										OWNER PHONE										112																													
ational RV																				909/943-6007										113																													
OWNER MAILING ADDRESS										114										STATE										115										ZIP CODE										116									
11 North Perris Blvd.																				CA																				92571																			

III. ENVIRONMENTAL CONTACT

CONTACT NAME										117										CONTACT PHONE										118																													
Gomez																				909/943-6007 X273										119																													
CONTACT MAILING ADDRESS										120										STATE										121										ZIP CODE										122									
11 North Perris Blvd.																				CA																				92571																			

PRIMARY

IV. EMERGENCY CONTACTS

SECONDARY

123										NAME										128									
Goodrick										Shay Gomez										129									
124										TITLE										129									
Human Resources										Environmental Specialist										130									
125										BUSINESS PHONE										130									
909/943-6007 X273										909/943-6007 X273										131									
126										24-HOUR PHONE										131									
										N/A										132									
127										PAGER #										132									
										N/A										133									

ADDITIONAL LOCALLY COLLECTED INFORMATION:

Statement: Based on my inquiry of those individuals responsible for obtaining the information, I certify under penalty of law that I have personally examined and compared the information submitted and believe the information is true, accurate, and complete.

SIGNATURE OF OWNER/OPERATOR OR DESIGNATED REPRESENTATIVE										DATE										134										NAME OF DOCUMENT PREPARER										135									
Goodrick																														SHAY GOMEZ																			
136										TITLE OF SIGNER										137																													
Human Resources Manager																																																	

California Hazardous Material Inventory Form

ADD DELETE REVISE (1)

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22

(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP# GRID# (7)

(8) CHEMICAL NAME Propane TRADE SECRET (11) Y N

(9) COMMON NAME Propane EHS or *RS (12) Y N

(10) CAS# 74-98-6 * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 500

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 250

(21) LARGEST CONTAINER 500 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic/Nonmetallic Drum	Pag	Tote Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
100	Propane	Y N	74-98-6
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA # (33) UN1978 Dot Hazard Class (34) 2.1

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Fuel for forklifts

NTPA 704 RATING (36) HEALTH: 3 FIRE: 4 REACTIVITY: 0 SPECIAL HAZARDS:

California Hazardous Material Inventory Form

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22

(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP#

(7) GRID#

(8) CHEMICAL NAME

(9) COMMON NAME Calsol 325 Thinner

(10) CAS#

(13) FIRE CODE
HAZARD CLASSES *

TRADE SECRET (11) Y N

EHS or *RS (12) Y N

* IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 220

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 150

(21) LARGEST CONTAINER 55 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank Can Box Tank Wagon
Below Ground Tank Carboy Cylinder Rail Car
Tank Inside Building Silo Glass Bottle
Steel Drum 55-gal Drum Plastic Bottle
Plastic/Nonmetallic Drum Bag 1-gal Bin

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
99	Petroleum Naptha	Y N	803-03-6
.02	Benzene	Y N	71-43-2
		Y N	
		Y N	

CLASSIFICATIONS

UNNA# (33)

Doc Hazard Class (34) 3.3

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Cleaning

NEPA 704 RATING (36) HEALTH: 1 FIRE: 3 REACTIVITY: 0 SPECIAL HAZARDS:

California Hazardous Material Inventory Form

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP# GRID# (7)

(8) CHEMICAL NAME Ethylene Glycol TRADE SECRET (11) Y N

(9) COMMON NAME Anti-Freeze EHS or *RS (12) Y N

(10) CAS# * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 165

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 90

(21) LARGEST CONTAINER 55 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic Nonmetallic Drum	Bag	Toile Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
	Ethylene Glycol	Y N	107-21-1
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA# (33) Dot Hazard Class (34) 33

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) RVS

NFPA 704 RATING (36) HEALTH 2 FIRE 1 REACTIVITY 0 SPECIAL HAZARDS

California Hazardous Material Inventory Form

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP# GRID# (7)

(8) CHEMICAL NAME TRADE SECRET (11) Y N

(9) COMMON NAME Transmission Oil EHS or *RS (12) Y N

(10) CAS# * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE

HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED-HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT
LBS TONS MAX DAILY AMT (23) 110

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 70

(21) LARGEST CONTAINER 55 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER Above Ground Tank Can Box Tank Wagon
Below Ground Tank Carboy Cylinder Tank Wagon
Tank Inside Building Silo Glass Bottle Rail Car
Steel Drum Fiber Drum Glass Bottle
Plastic/Nonmetallic Drum Bag Plastic Bottle
Tote Bin

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
90	Solv. Ref. Petr. Base Stock	Y N	64742-525-0
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA # (33) DOT Hazard Class (34) 3.2

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) As needed for R.V.s and forklifts

NFPA 704 RATING (36) HEALTH: 1 FIRE: 1 REACTIVITY: 0 SPECIAL HAZARDS:

California Hazardous Material Inventory Form

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP# GRID# (7)

(8) CHEMICAL NAME Petroleum Oil TRADE SECRET (11) Y N

(9) COMMON NAME Motor Oil 15W-30 EHS or *RS (12) Y N

(10) CAS# * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL. CU FT LBS TONS MAX DAILY AMT (23) 110

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 70

(21) LARGEST CONTAINER 55 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic/Nonmetallic Drum	Bag	Tote Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
90	Solv. Ref. Petr. Base Stock	Y N	64742-65-0
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UN/NA # (33) DOT Hazard Class (34) 3.2

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) As needed in R.Vs and forklifts

NFPA 704 RATING (36) HEALTH: 1 FIRE: 1 REACTIVITY: 0 SPECIAL HAZARDS:

California Hazardous Material Inventory Form

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP# GRID# (7)

(8) CHEMICAL NAME Petroleum Naphtha TRADE SECRET (11) Y N

(9) COMMON NAME Gear Oil 85W-140 EHS or *RS (12) Y N

(10) CAS# * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 55

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 20

(21) LARGEST CONTAINER 55 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic/Nonmetallic Drum	Bag	Tote Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
90	Petroleum Naphtha	Y N	64742-65-0
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UN/NA # (33) UN1270 Dot Hazard Class: (34) 3.2

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Used in forklifts

NFPA 704 RATING (36) HEALTH: 1 FIRE: 1 REACTIVITY: 0 SPECIAL HAZARDS:

California Hazardous Material Inventory Form

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP# GRID# (7)

(8) CHEMICAL NAME Petroleum Distillates TRADE SECRET (11) Y N

(9) COMMON NAME Thinner - Solvent Blend EHS or *RS (12) Y N

(10) CAS# * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE

HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT
LBS TONS MAX DAILY AMT (23) 55

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 30

(21) LARGEST CONTAINER 55 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic/Nonmetallic Drum	Bag	Tote Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
15	Methyl Ethyl Ketone	Y N	78-93-3
45	Petroleum Distillates	Y N	64742-89-8
11	Acetone	Y N	67-64-1
		Y N	
		Y N	

CLASSIFICATIONS

UNNA# (33) UN1268 Dot Hazard Class (34) 3.2

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Operations clean-up

NFPA 704 RATING (36) HEALTH 1 FIRE 3 REACTIVITY 0 SPECIAL HAZARDS:

California Hazardous Material Inventory Form

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP#

(7) GRID#

(8) CHEMICAL NAME Styrene Resin TRADE SECRET (11) Y N

(9) COMMON NAME Polyester Resin EHS or *RS (12) Y N

(10) CAS# * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 2750

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 240

(21) LARGEST CONTAINER 550 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic Nonmetallic Drum	Bag	Tote Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
35	Styrene	Y N	100-42-5
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA# (33) UN1866 Dot Hazard Class (34) 3.3

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Manufacturing process

NFPA 704 RATING (36) HEALTH 2 FIRE 3 REACTIVITY 2 SPECIAL HAZARDS

California Hazardous Material Inventory Form

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP# GRID# (7)

(8) CHEMICAL NAME TRADE SECRET (11) Y N

(9) COMMON NAME Undercoating - Asphalt Emulsion - Waterbased EHS or *RS (12) Y N

(10) CAS# * IF EHS OR RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE

HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 440

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 80

(21) LARGEST CONTAINER 16 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic/Nonmetallic Drum	Bag	Note Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
	Not available	Y N	
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA # (33) Dot Hazard Class (34) 3.3

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Rust proofing of exposed metal on R.V. chassis

NEPA 704 RATING (36) HEALTH 4 FIRE 1 REACTIVITY 0 SPECIAL HAZARDS

California Hazardous Material Inventory Form

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BUSINESS NAME (4) NATIONAL R.V., INC.

CHEMICAL LOCATION (5)

MAP# (6) GRID# (7)

CHEMICAL NAME (8) Unleaded Gasoline TRADE SECRET (11) Y N

COMMON NAME (9) Unleaded Gasoline EHS or *RS (12) Y N

CAS# (10)

FIRE CODE (13)

HAZARD CLASSES *

* IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

TYPE (14) PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

PHYSICAL STATE (17) SOLID LIQUID GAS

FED HAZARD CATEGORIES (18) FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

STATE WASTE CODE (19) N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 8,000

DAYS ON SITE (20) 365 AVG DAILY AMT (24) 6,500

LARGEST CONTAINER (21) 8,000 ANNUAL WASTE AMT (25) 0

STORAGE CONTAINER (26)

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic Nonreactive Drum	Map	Tot Bin	

STORAGE PRESSURE (27) AMBIENT ABOVE AMBIENT BELOW AMBIENT

STORAGE TEMPERATURE (28) AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
	Gasoline	Y N	806-61-9
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA# (33)

Dot Hazard Class (34) 3.2

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Used in completed R.V.s for road testing

NFPA 704 RATING (36) HEALTH 1 FIRE 3 REACTIVITY 0 SPECIAL HAZARDS

California Hazardous Material Inventory Form

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BUSINESS NAME (4) NATIONAL R.V., INC.

CHEMICAL LOCATION (5)

MAP# (6)

GRID# (7)

CHEMICAL NAME (8) Styrene Monomer Resin TRADE SECRET (11) Y N

COMMON NAME (9) Gelcoat 944A626M EHS or *RS (12) Y N

CAS# (10)

FIRE CODE (13)

HAZARD CLASSES *

* IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

TYPE (14) PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

PHYSICAL STATE (17) SOLID LIQUID GAS

FED HAZARD CATEGORIES (18) FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

STATE WASTE CODE (19) N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 440

DAYS ON SITE (20) 365 AVG DAILY AMT (24) 225

LARGEST CONTAINER (21) 55 ANNUAL WASTE AMT (25) 0

STORAGE CONTAINER (26)

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic Nonmetallic Drum	Bag	Tote Bin	

STORAGE PRESSURE (27) AMBIENT ABOVE AMBIENT BELOW AMBIENT

STORAGE TEMPERATURE (28) AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
31.5	Styrene Monomer	Y N	100-42-5
10	Talc	Y N	14807-96-6
10	Kaolin	Y N	1332-58-7
		Y N	
		Y N	

CLASSIFICATIONS

UN/NA # (33) UN1866 Dot Hazard Class: (34) 3.3

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Manufacturing process

NFPA 704 RATING (36) HEALTH: 2 FIRE: 3 REACTIVITY: 2 SPECIAL HAZARDS: -

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP# GRID# (7)

(8) CHEMICAL NAME Methyl Ethyl Ketone Peroxide TRADE SECRET (11) Y N

(9) COMMON NAME M.E.K. EHS or *RS (12) Y N

(10) CAS# * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 55

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 7

(21) LARGEST CONTAINER 1 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Elastic/Nonmetallic Drum	Bag	Tote Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
21	Methyl Ethyl Ketone Peroxides	Y N	1338-23-4
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA # (33) UN3107 Dot Hazard Class (34) 3.2

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Manufacturing process

NEPA 704 RATING (36) HEALTH 1 FIRE 1 REACTIVITY 0 SPECIAL HAZARDS

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22

(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP#

GRID# (7)

(8) CHEMICAL NAME Methylene Chloride Adhesive TRADE SECRET (11) Y N

(9) COMMON NAME V&S 581-B Glue EHS or *RS (12) Y N

(10) CAS# * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU.FT LBS TONS MAX DAILY AMT (23) 110

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 75

(21) LARGEST CONTAINER 55 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiberglass Drum	Plastic Bottle	
Plastic Nonmetallic Drum	Bag	40L Drum	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
65	Methylene Chloride	Y N	75-09-2
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UN/NA # (33)

Dot Hazard Class (34) 3.3

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Manufacturing process

NFPA 704 RATING (36) HEALTH 2 FIRE 2 REACTIVITY 0 SPECIAL HAZARDS

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BUSINESS NAME (4) NATIONAL R.V., INC.

CHEMICAL LOCATION (5)

MAP# (6) GRID# (7)

CHEMICAL NAME (8) Aliphatic Dibasic Acid Esters TRADE SECRET (11) Y N

COMMON NAME (9) EHS or *RS (12) Y N

CAS# (10) * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

FIRE CODE (13)

HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

TYPE (14) PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

PHYSICAL STATE (17) SOLID LIQUID GAS

FED HAZARD CATEGORIES (18) FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

STATE WASTE CODE (19) N/A UNITS (22) GAL CU FT
LBS TONS MAX DAILY AMT (23) 165

DAYS ON SITE (20) 365 AVG DAILY AMT (24) 55

LARGEST CONTAINER (21) 55 ANNUAL WASTE AMT (25) 0

STORAGE CONTAINER (26) Above Ground Tank Can Box Tank Wagon
Below Ground Tank Carboy Cylinder Rail Car
Tank Inside Building Silo Glass Bottle
Steel Drum Fiber Drum Plastic Bottle
Plastic/Nonmetallic Drum Bag Tote Bin

STORAGE PRESSURE (27) AMBIENT ABOVE AMBIENT BELOW AMBIENT

STORAGE TEMPERATURE (28) AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
66	Dimethyl Gutarate	Y N	1119-40-0
17	Dimethyl Adipate	Y N	627-93-0
16.5	Dimethyl Succinate	Y N	106-65-0
		Y N	
		Y N	

CLASSIFICATIONS

UN/NA # (33) DOT Hazard Class: (34) 3.2

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Spray gun cleaner

NFPA 704 RATING (36) HEALTH: 1 FIRE: 1 REACTIVITY: 0 SPECIAL HAZARDS:

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP#

(7) GRID#

(8) CHEMICAL NAME Diphenylmethane - Diisocyanate (MDI)

(9) COMMON NAME

(10) CAS#

(13) FIRE CODE
HAZARD CLASSES *

TRADE SECRET (11) Y N

EHS or *RS (12) Y N

* IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (15)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 110

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 55

(21) LARGEST CONTAINER 55 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic/Nonmetallic Drum	Bag	Toile Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
	Diphenylmethane Diisocyanate	Y N	101-68-8
	Isocyanate Prepolymer	Y N	61245-23-8
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA # (33) UN2489 Dot Hazard Class (34) 6.1

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Cleaning

NFPA 704 RATING (36) HEALTH: 3 FIRE: 0 REACTIVITY: 0 SPECIAL HAZARDS: -

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP#

(7) GRID#

(8) CHEMICAL NAME Diesel Fuel TRADE SECRET (11) Y N

(9) COMMON NAME Diesel Fuel EHS or *RS (12) Y N

(10) CAS# * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CUFT LBS TONS MAX DAILY AMT (23) 500

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 150

(21) LARGEST CONTAINER 500 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic/Nonmetallic Drum	Bar	Tote Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

% WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
	Petroleum Mid-Distillate	Y N	68476-34-6
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA # (33) UN1993 DOT Hazard Class (34) 32

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) R.V.'S

NFPA 704 RATING: (66) HEALTH 1 FIRE 2 REACTIVITY 0 SPECIAL HAZARDS

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP#

(7) GRID#

(8) CHEMICAL NAME Oxygen

(9) COMMON NAME Oxygen

(10) CAS# 7782-44-7

(13) FIRE CODE HAZARD CLASSES *

TRADE SECRET (11) Y N

EHS or *RS (12) Y N

* IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS.

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 18,000 lbs.

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 3,600 lbs.

(21) LARGEST CONTAINER 250 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank Can Box Tank Wagon
 Below Ground Tank Carboy Cylinder Rail Car
 Tank Inside Building Silo Glass Bottle
 Steel Drum Fiber Drum Plastic Bottle
 Plastic/Nonmetallic Drum Bar Tote Bin

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
100	Oxygen	Y N	7782-44-7
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UN NA # (33) UN1072 Dot Hazard Class (35) 2.1

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Welding

NEPA 704 RATING (36) HEALTH 1 FIRE 2 REACTIVITY 0 SPECIAL HAZARDS

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(4) BUSINESS NAME NATIONAL R.V., INC.
 (5) CHEMICAL LOCATION
 (6) MAP# GRID# (7)

(8) CHEMICAL NAME Acetylene TRADE SECRET (11) Y N
 (9) COMMON NAME Acetylene EHS or *RS (12) Y N
 (10) CAS# 74-86-2 * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS
 (13) FIRE CODE HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)
 (17) PHYSICAL STATE SOLID LIQUID GAS
 (18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 5,000
 (20) DAYS ON SITE 365 AVG DAILY AMT (24) 1,000
 (21) LARGEST CONTAINER 250 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER
 Above Ground Tank Can Box Tank Wagon
 Below Ground Tank Carboy Cylinder Rail Car
 Tank Inside Building Silo Glass Bottle
 Steel Drum Fiber Drum Plastic Bottle
 Plastic/Nonmetallic Drum Bag Tote Bin

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT
 (28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
100	Acetylene	Y N	74-86-2
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA # (33) UN1001 Dot Hazard Class: (34) 2.1
 HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Welding
 NFPA 704 RATING (36) HEALTH: 1 FIRE: 4 REACTIVITY: 3 SPECIAL HAZARDS:

California Hazardous Material Inventory Form

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP#

(7) GRID#

(8) CHEMICAL NAME Argon / Carbon Dioxide Mix

(9) COMMON NAME

(10) CAS# 7440-37-1

(11) TRADE SECRET Y N

(12) EHS or *RS Y N

(13) FIRE CODE HAZARD CLASSES *

* IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 10,000

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 2,000

(21) LARGEST CONTAINER 250 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic Nonmetallic Drum	Bag	Slote Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
75	Argon	Y N	7440-37-1
25	Carbon Dioxide	Y N	124-38-9
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA# (33) UN1006 Dot Hazard Class (34) 2.1

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Welding

(36) NFPA 704 RATING HEALTH 2 FIRE 0 REACTIVITY 0 SPECIAL HAZARDS

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP# GRID# (7)

(8) CHEMICAL NAME Urethane TRADE SECRET (11) Y N

(9) COMMON NAME Henkle Adhesive EHS or *RS (12) Y N

(10) CAS# 7782-44-7 * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 990

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 110

(21) LARGEST CONTAINER 55 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic/Nonmetallic Drum	Bag	Tote Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
10-30	Diphenylmethane - Diisocyanate	Y N	101-68-8
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA# (33) Dot Hazard Class (34) Manufacturing process (35)

NFA 704 RATING (36) HEALTH 2 FIRE 1 REACTIVITY 0 SPECIAL HAZARDS

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP# GRID# (7)

(8) CHEMICAL NAME Aromatic Hydrocarbon TRADE SECRET (11) Y N

(9) COMMON NAME Styrene Monomer 50 EHS or *RS (12) Y N

(10) CAS# 100-42-5 * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) FIRE CODE HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Corries (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CU FT LBS TONS MAX DAILY AMT (23) 165

(20) DAYS ON-SITE 365 AVG DAILY AMT (24) 30

(21) LARGEST CONTAINER 55 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic/Nonmetallic Drum	Bag	Tote Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

%WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
	Aromatic Hydrocarbon	Y N	100-42-5
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UN/NA # (33) UN2055 Det. Hazard Class (34) 3

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Manufacturing process

NFPA 704 RATING (36) HEALTH: 2 FIRE: 2 REACTIVITY: 0 SPECIAL HAZARDS:

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(4) BUSINESS NAME NATIONAL R.V., INC.

(5) CHEMICAL LOCATION

(6) MAP# GRID# (7)

(8) CHEMICAL NAME 2-Propanone TRADE SECRET (11) Y N

(9) COMMON NAME Acetone EHS or *RS (12) Y N

(10) CAS# 67-64-1 * IF EHS or RS BOX IS "Y", ALL AMOUNTS MUST BE IN LBS

(13) HAZARD CLASSES *

* COMPLETE BLOCK (13) IF REQUESTED BY THE LOCAL IMPLEMENTING AGENCY - REFER TO INSTRUCTIONS

(14) TYPE PURE MIXTURE WASTE RADIOACTIVE (15) Y N Curies (16)

(17) PHYSICAL STATE SOLID LIQUID GAS

(18) FED HAZARD CATEGORIES FIRE REACTIVE PRESSURE RELEASE ACUTE HEALTH CHRONIC HEALTH

(19) STATE WASTE CODE N/A UNITS (22) GAL CUFT LBS TONS MAX DAILY AMT (23) 220

(20) DAYS ON SITE 365 AVG DAILY AMT (24) 60

(21) LARGEST CONTAINER 55 ANNUAL WASTE AMT (25) 0

(26) STORAGE CONTAINER

Above Ground Tank	Can	Box	Tank Wagon
Below Ground Tank	Carboy	Cylinder	Rail Car
Tank Inside Building	Silo	Glass Bottle	
Steel Drum	Fiber Drum	Plastic Bottle	
Plastic/Nonmetallic Drum	Bag	Tote Bin	

(27) STORAGE PRESSURE AMBIENT ABOVE AMBIENT BELOW AMBIENT

(28) STORAGE TEMPERATURE AMBIENT ABOVE AMBIENT BELOW AMBIENT CRYOGENIC

% WT (29)	HAZARDOUS COMPONENT (30)	EHS or RS (31)	CAS# (32)
	Acetone	Y N	67-64-1
		Y N	
		Y N	
		Y N	
		Y N	

CLASSIFICATIONS

UNNA # (31) UN1093 Dot Hazard Class (34) 3

HOW IS THIS MATERIAL USED? WHAT IS IT USED FOR? (35) Manufacturing process

NFPA 704 RATING (36) HEALTH 1 FIRE 3 REACTIVITY 0 SPECIAL HAZARDS

**HAZARDOUS MATERIALS BUSINESS EMERGENCY PLAN
EMERGENCY PROCEDURES**

Emergency response plans and procedures are an integral part of the HMBEP. By taking the time to develop plans and procedures for your business, you will avoid complications resulting from inaction or misguided action during an emergency. Once the plans and procedures are developed, your employees will have an informative guide to follow in the event of an emergency. You must address each of the following items, however, the amount of detail you provide will depend upon the size and nature of the business, the damage potential of the hazardous materials handled and the location of the business with respect to residential or other populated areas.

1. EMERGENCY RESPONSE PLANS AND PROCEDURES

- A. If you have a release or threatened release of hazardous materials, your business is required by state law to provide immediate notification to the following agencies:

Immediately call:

Local emergency response personnel (Fire, paramedics, police or sheriff)	911
State Office of Emergency Services	(800) 852-7550 or (916) 262-1621

Immediately call the appropriate jurisdiction:

The County of Riverside Hazardous Materials Management Division:	(909) 358-5055
CDF/Banning Fire Service	(909) 922-3210
City of Corona Fire Department	(909) 736-2220
City of Riverside Fire Department	(909) 826-5321

Person(s) within the facility required to respond to a hazardous materials incident:

Name: <u>Shay Gomez</u>	Telephone: <u>(909) 943-6007 X273</u>
Name: <u>Jeff Goodrick</u>	Telephone: <u>(909) 943-6007 X275</u>

- B. Identify the local emergency medical facility that will be used by your business in the event of an injury caused by the release of a hazardous material:

Name: US HEALTH WORKS
Address: 6485 Day Street Suite 302
City: Moreno Valley
Phone: (909) 653-5291

2. PREVENTION

Describe the kinds of hazards associated with the materials present at your business. Provide information on the steps taken at your business, or the policies or procedures now in place, to **help prevent** an accidental release or a hazardous material. Issues for discussion may include safety, storage, and containment procedures. Be specific for each type of hazardous material at your business.

Hazardous materials present at National R.V. consist of various adhesives, glues, petroleum products and solvents. The chemicals on the most part, present only nominal fire hazards and disposal concerns. All of the hazardous materials are contained and stored in compliance with current laws and regulations. Prevention of possible health hazards is accomplished by implementation of the contingency plan.

2. MITIGATION

Describe the procedures to be followed to **reduce the severity** of a release or threatened release of a hazardous material at your business. The procedures should detail the actions to be taken by employees to stop a release, contain a release, or to reduce the problems associated with a release. What is your immediate response to a spill, fire, explosion or airborne release at your business? Do not write procedures that exceed the capabilities of employees or equipment at your business or that violate any workers safety laws.

All hazardous materials are contained and stored in compliance with current laws and regulations. There is no combining of incompatible materials. Additional preventative measures: 1) proper container labeling, 2) housekeeping program. The immediate response to a fire, spill, or airborne release is contact a supervisor. In the event a spill results in a fire unmanageable by response staff, 911 will be called and agency emergency response personnel dispatched.

4. ABATEMENT

Describe what you would do to stop and remove each hazard. How do you handle the complete process of stopping a release, cleaning up, and disposing of released materials at your business? What aspects of the response are beyond your ability and need to be handled by others? Who would you call to handle the release?

Each employee who works with or around the hazardous materials is trained in the response to a release. This training includes proper handling, response, notification and mitigation procedures for each product. In a minor release occurs, the individual discovering the incident should attempt to locate and eliminate the source. If possible, try to stop or at least contain the release. This may be as simple as shutting of a valve. In the event the leak cannot be stopped or contained by handheld containment measures the employee shall notify his supervisor, who will in turn have the spill contained by an earth dike by spill response crew. The source of the spill shall then be further assessed and mitigated. All contaminated spill will be contained and removed by a certified waste hauler.

5. EARTHQUAKES

Identify the areas and equipment in your business which would require **immediate attention** following an earthquake. Check for equipment such as gas cylinders, piping, drums, etc., that may need to be secured or spillage that may require mitigation or abatement.

The areas where hazardous materials and waste are stored will be checked immediately. Gasoline, diesel and propane tanks will be thoroughly inspected. Utility shut-offs will be tested. For further emergency procedures please refer to the Emergency Action Plan in the appendix.

6. HAZARDOUS WASTE CONTINGENCY

Specific procedures for prevention, mitigation and abatement of a release of **hazardous waste** generated at your business. This section only applies to hazardous waste generators.

All hazardous material wastes are contained and stored in compliance with current laws and regulations. There is no combining of incompatible wastes. All hazardous waste is recycled or removed off-site periodically as required by a certified waste hauler.

7. UNAUTHORIZED RELEASE RESPONSE PLAN

Specific procedures for mitigation, abatement and reporting of an unauthorized release from an **underground storage tank (UST)**. The plan must address a release from a single wall or double wall tank system as applicable. This plan should cover the entire UST system. This section only applies to UST owner/operators?

In the event a leak is discovered from the UST system, the system will be immediately shut down and leak detection services notified to respond. Should a catastrophic release occur the immediate premises will be evacuated and emergency personnel notified.

BUSINESS EMERGENCY PLAN PACKET FOR THE COUNTY OF RIVERSIDE

I certify, under the penalty of perjury, that the information contained in this packet is true and correct to the best of my knowledge.

Jeffrey Goodrick 3-28-02
SIGNATURE

3/28/2002
DATE

Jeffrey Goodrick
NAME

Human Resources Manager
TITLE

Please submit IN DUPLICATE to the office in your local area.

Keep one copy for your record to assist you in you implementation.

STATEMENT OF EXEMPTION (only to be completed if you do NOT have to prepare a plan)

BUSINESS NAME: _____

BUSINESS ADDRESS: _____

NUMBER	STREET	SUITE
CITY	STATE	ZIP

MAILING ADDRESS: _____

NUMBER	STREET	SUITE
CITY	STATE	ZIP

BUSINESS TELEPHONE: () _____

I understand the requirements for submitting a Business Emergency Plan and I declare, under penalty of perjury, that a Business Emergency Plan is not required for this business.

BUSINESS OWNER/OPERATOR NAME: _____ TITLE: _____
DATE: _____

REASON YOU BELIEVE YOUR BUSINESS IS EXEMPT:

BUSINESS EMERGENCY TRAINING

Employers are required by State law to have a program which provides employees with initial and refresher training in the following areas:

- A. Methods for the safe handling of hazardous materials stored at your business, including familiarity with the characteristics and hazards of each material and measures employees can take to protect themselves from chemical hazards;
- B. The CAL OSHA Hazardous Communication Standards;
- C. Correct use of emergency response equipment and supplies available at your business;
- D. The prevention, abatement and mitigation procedures you have developed for your business and explained on the Business Emergency Plan;
- E. The emergency evacuation plans you have developed, the notification procedure used to alert people to evacuate, and the closest location to obtain appropriate emergency medical care;
- F. Procedures to coordinate with assist the local emergency personnel that may respond to your business;
- G. Who and how to call for immediate assistance in the event of an accident involving hazardous materials.

ALL EMPLOYEE TRAINING SHALL BE DOCUMENTED AND UPDATED ANNUALLY

1. Personnel

- A. Are there any specially trained hazardous materials emergency response personnel at your business? YES NO
If yes, how many personnel and what are their levels of training or capabilities?

- B. Do you have decontamination capabilities for victims of exposure to hazardous materials at your business? YES NO
If yes, what type of decontamination can be performed at your business?

Final aid equipment in vault, safety shower and eyewash station, oxygen in office

- C. Do you have personnel that will provide site security at your business during and after a hazardous materials incident? YES NO

2. Equipment

- A. List the type and location of equipment that can or will be used for response to hazardous materials incidents at your business. (Examples of equipment types: personal protective equipment, fire extinguishers, spill containment material, etc.)

TYPE OF EQUIPMENT

Fire hydrants (2)

Fire extinguishers

Pigs (absorbents)

Sprinklers

LOCATION

South side of facility

Throughout facility

Throughout facility

Manufacturing area

POST FOR EMPLOYEES

HAZARDOUS MATERIALS BUSINESS EMERGENCY PLAN: EMERGENCY NOTIFICATION

During an emergency involving a release or a threatened release of a hazardous material you must notify appropriate agencies. Information you should be prepared to supply includes:

1. Name and telephone number of the reporting party;
2. Name and address of business;
3. Time and type of release (e.g., damaged containers, malfunctioning equipment, etc.);
4. Name and quantity of material (s) involved;
5. Extent and number of injuries;
6. Action taken or being taken to mitigate or reduce emergency;
7. Potential hazards to human health or the environment surrounding the business.

AGENCY NOTIFICATION:

Fire Department

911

Ambulance/Paramedic

911

Police/Sheriff

911

Hospital US Health Works

Phone # (909) 653-5921

Primary Facility Emergency Contact Person

Name: Shay Gomez

Phone # (909) 943-6007 X273

Hazardous Materials Management Division

(909) 358-5055

CDF/Banning Fire Service

(909) 922-3210

City of Corona Fire Department

(909) 736-2220

City of Riverside Fire Department

(909) 826-5321

California Office of Emergency Service

(800) 852-7550

National Response Center

(800) 424-8802

Poison Control Center

(800) 876-4766

Hazardous Materials Cleanup Contractor

(562) 427-7277

Name of Contractor ASBURY ENVIRONMENTAL SERVICES

(800) 974-4495 EXT. 438



County of Riverside Health Services Agency
 Department of Environmental Health
 Hazardous Materials Management Division

10/23/03
 B

R

Business Emergency Plan Inspection Report

Facility Name: National RV Date: May 22 2007
 Address: 3411 North Perris Blvd Inspection: Routine [] Follow-Up! []
 City: Perris Zip Code: _____ Facility #: 82241
 Contact Person: _____ Telephone: _____

Riverside County Ordinance 651 California Code of Regulations TITLE 19 Health & Safety Code Chapter 8.95

Yes No N/A Items marked "No" are violations of the above referenced codes and must be corrected as follows:

I. Permit			See Attached Report
<input checked="" type="checkbox"/>		A. Current Permit	
II. Business Emergency Plan			
<input checked="" type="checkbox"/>		A. Approved Plan on Site and Available for Review	
<input checked="" type="checkbox"/>		B. Plan Updated Within Last 2 Years	
III. Chemical Inventory Disclosure			
<input checked="" type="checkbox"/>		A. Chemical Inventory Complete	
<input checked="" type="checkbox"/>		B. Inventory Updated Annually	
IV. Emergency Response Plans and Procedures			
<input checked="" type="checkbox"/>		A. Mitigation, Prevention, Abatement Measures	
	<input checked="" type="checkbox"/>	B. Documented Employee Training	
<input checked="" type="checkbox"/>		C. Evacuation Plan with Routes	
<input checked="" type="checkbox"/>		D. Facility Map showing Location of Chemicals	
V. Posting			
	<input checked="" type="checkbox"/>	A. Entrance and Exits Posted	
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	B. Emergency Phone Numbers Posted	
	<input checked="" type="checkbox"/>	C. Hazardous Materials Storage Area Posted	
<input checked="" type="checkbox"/>		D. Emergency Equipment Posted	
	<input checked="" type="checkbox"/>	E. Pesticide Storage Area Posted	
VI. Storage			
	<input checked="" type="checkbox"/>	A. Maintained to Minimize Possibility of Release	
	<input checked="" type="checkbox"/>	B. Handling Areas Secured	
	<input checked="" type="checkbox"/>	C. Incompatibles Stored Separately	
	<input checked="" type="checkbox"/>	D. Containers Properly Labeled	

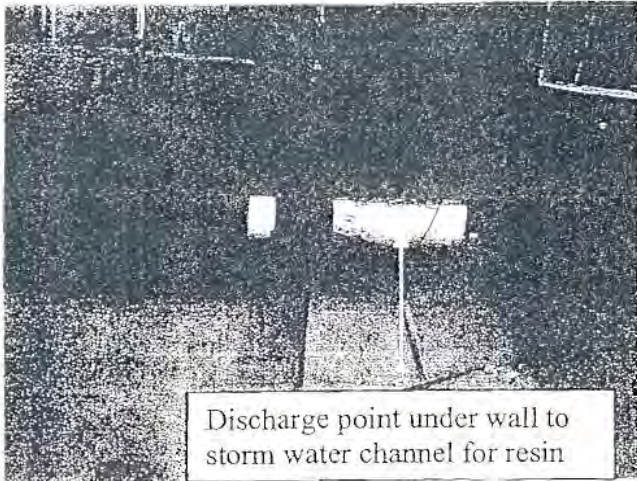
The above noted violations shall be corrected within 30 days.

Specialist: Pace Mitchell
 Received by: Jeffrey A. Goodnick
 Signature: _____
 Print Name: JEFFREY A. GOODNICK
 Print Title: H.R. MANAGER

Riverside Office
 4065 County Circle Drive
 Riverside, CA 92503
 (909) 358-5055

Indio Office
 47923 Oasis Street, Room E4
 Indio, CA 92201
 (619) 863-8976

San Jacinto Office
 1370 S. State Street, Room 101
 San Jacinto, CA 92583
 (909) 654-3878



Opening in building leading to storm water collection system



Unlabeled container

Summary of the above inspection:

- I) I have requested the information related to the temporary fuel tank disposal and not received any written documentation. The Hazardous Materials Management Division (Division) is formally requesting National RV provide the following:
 - a. A written processing protocol for the tanks to include removal of fuels, cleaning of the tanks if done, etc.
 - b. Written documentation from Air Quality Management district for how they want the tanks handled as the vapors of the fuels directly discharge into the air.
 - c. Written documentation from the Santa Ana Regional Water Quality Control Board allowing for the disposal of the tanks into the landfill and any conditions the Board may have placed on the disposal.
- II) I was informed that the paint filters are allowed to be dried then placed into the trash based on some testing. As the Division did not have any involvement in this decision a request for all documentation related to this practice is to be supplied. Flammable paints as they dry are generating a small quantities of heat which has caused fires at other facilities.

Hazardous Waste Program Inspection:

- I) As shown in several of the photographs, I documented that the employees are placing normal trash into the hazardous waste temporary containers. Hazardous waste containers are to be used for only hazardous waste. Training of the employees related to which material is to be disposed of as hazardous and which can go into the normal trash is required. A prior event is a very good case for basing this requirement as hazardous waste made its way to C R & R MERF facility.
- II) One tube of Silicone in the normal trash in the Hazardous Waste handling area would indicates additional work on what is acceptable for the normal trash and what is to be handled as hazardous waste. This mistake was made in the hazardous waste area.
- III) Hazardous Waste manifests should have the completed copy from the treatment and disposal facility on file within 90 days of disposal. An inspection of the on site manifests discovered that a manifest from January 4, 2005 did not have the facility copy filed. It is the generators responsibility to insure the treatment and disposal facility has received the hazardous waste and, within 90 days, the confirmation copy is received.

Business Emergency Plan Inspection:

- I) Chemicals shall all be in properly labeled containers. This facility has numerous employees and chemicals storage in a wide variety of containers. Many containers did not have labels indicating the contents (guessing what was contained is a best means of identification except for detecting the chemical odor which is not a recommended practice). All chemicals are to be stored in a container that is properly labeled. MEKP is stored in the fiberglass/gel coat area in opaque containers with plastic tubing as shown in the photographs. None of the containers had a label prior to my inspection.
- II) A container of a white liquid was labeled Acetone. As Acetone is a clear liquid, the contained liquid is not Acetone and was suspected to be white glue. Mislabeling of the contained substance is a worst case than not labeling. Employees not familiar with the chemicals will mistakenly use this material believing it is Acetone.
- III) I discovered the use of food containers for storage of chemicals used in the manufacturing of the RV's. The photographs show Gatorade, another drink bottle and a distilled water bottle all having something other than what the label indicated. The Gatorade for example is consistent with transmission fluid and the distilled water contained mineral sprits. Once again food containers are not an acceptable container for the storage of chemicals, and this practice is to be stopped at once. As was mentioned during this inspection, Cal OSHA has problems with food containers at the employee work stations.
- IV) The distilled water bottle is a plastic container which may not be compatible with the mineral sprits being stored inside of the container. From the Fire Code, all flammable and combustible liquids are to be stored in metal containers. Solvents generally weaken the structure of the plastic containers.
- V) Several areas were not properly labeled as to the chemical storage. When a drum has the label covered by a heating jacket, a sign should be used to indicate the chemical stored within the drum. Examples are the two glue drums one labeled and one not labeled. This is to include the NFPA 704 sign. Some 704 signs are in locations the chemicals storage use to be and have not been moved. In other, the NFPA sign is not visible from a distance as it is blocked by another sign. Example is the hazardous waste transfer area adjacent to the chemical storage area. Other chemical storage areas are missing the NFPA 704 signs examples, the frame welding area, and two metal storage areas east of the hazardous waste transfer area.
- VI) A leaking vehicle as shown in the photographs was not being addressed. No absorbent was placed onto the concrete floor and the fluid causing a slip hazard remains on the floor. As soon as a leaking vehicle is discovered the spill is to be addressed and repairs to the vehicle made. The incident is addressed in the Business Emergency Plan (BEP) Prevention, Mitigation and Abatement sections and the employees are to address the incident in accordance with your BEP. This is also to include the hydraulic leak at the trash compacter as shown in the above photographs.
- VII) Emergency equipment, if required, shall have signs indicating it is available above the device so an employee will be able to see the sign when items are moved in front of the emergency equipment. The signs are to be readable and not faded out. One fire extinguisher sign was so faded it was now yellow in color and not readable from a short distance. Covering of fire extinguisher with wood is not an acceptable practice. Eye washes and emergency showers are also to be posted the same as the fire extinguishers.
- VIII) Emergency maps are present in various locations throughout the facility. Some of these maps are not easily seen as they are partially covered by other items. These maps need to be easily seen by the employees on a regular basis so the employee will know where National RV wants them to assemble

in the event of an emergency. Mr. Jon Morgan stated that National RV has conducted a practice drill which is beyond the current standards enforced by the Division but with a high turn over in employees the maps are the required item.

- (IX) As the work inside of the buildings is dynamic in nature it can be difficult to establish clear path ways for an employee to use in an emergency. In areas where the work is done a established surfaces (i.e. benches) the blocking of the normal walk way (an escape routine) by stock piling of material in the path way is not acceptable practice. Work wood working areas sometimes have either supplies or finished material in the walk way thus reducing it to a few inches wide.

Over All Training:

The biggest item is the failure of the training program to reduce the items seen during this inspection. Records for training of new employees are available and the program for new employees has been in existence for years I have in the past noted the lack of yearly training or its effectiveness. The lack of labels, incorrect labeling, misuse of bins assigned to specific waste types, food containers in the work area and the leaving of containers open when not being used demonstrates the need for more training. Past history has indicated this can be done and in recent years is lacking. Training is an on going issue and can be conducted in daily, weekly or monthly safety meetings in the various sections within National RV.

Storm Water Survey:

- I) Chemical are stored in areas not protected from rain. According to your Storm Water Pollution Prevent Plan chemical storage area are to be protected or any rain water run off is to be protected from chemical discharge into the storm water collection system. See the above photographs.
- II) Fine resin waste is discharged from the fiberglass work shop onto the ground then out to a storm water collection drain on the north side of the building. This discharges into a storm water drain that drains the property to the north onto National RV property. As I have worked several discharge complaints into the channel in the past few years this discharge is to be stopped immediately and the area cleaned.
- III) Fine particles of foam cut out side of the laminating shop can be moved by the wind which normally is present in the afternoon and evenings. These particles will migrate to the area south and east of the property which is currently in plan check for development with the City of Perris. These new business will be complaining of this waste once they get their first inspection for storm water compliance. As with the saw dust problems. National RV had worked on several years earlier this problem needs a long term solution not just a quick fix. Include the waste bins that contain the waste foam material.
- IV) When working on a hydraulic system adjacent to your storm water collection channel protection from the released hydraulic fluid migrating along with the water flowing in the channel is required. In this case a hydraulic ram was having a problem and the hydraulic lines were disconnected. Hydraulic fluid was leaking and no protection was provided by the individuals who were working to repair the problem. As no one was working this problem at the site it could not be determined how long the repairs had been underway and how long no one was monitoring the release to the channel. The area is required to be secured when individuals are not present working on the problem.

Notes:

Not all of the violations were photographed for this inspection. The inspections had extended beyond the total amount of time I was allowing of this facility, as a result I did not inspect section of this facility. I planned one day for both 3411 North Perris Blvd. and 100 West Sinclair in Perris.

From past history: prior to the events leading to the prior enforcement National RV had an internal employee that was responsible for the environmental compliance. National RV during this time did have problems but made corrections timely and did maintain those corrections for an extended period of time. At the time of enforcement this employee was responsible for multiple functions not related to just environmental. As the Division has seen when one person is given multiple tasks, not all of the tasks are given the time to maintain their standards. This was part of the findings by the Division at the time of the enforcement. The environmental person was given environmental compliance as her primary job function and new standards were achieved with a return back to not having issues warranting enforcement. But after a short period of time this was changed to an outside company and the dividing of the responsibilities. As of that change, the Division has not found National RV having approached their prior levels of compliance. For the Division to reach the prior levels of confidence, routine/follow up inspections should return to one or two small infractions not the numerous violations seen the last three years. This means that more than one inspection having reached these standards in succession not just in a short period of time or with prior knowledge of the pending inspection.

Received By
[Signature]
National RV



Certified Unified Program Agency
County of Riverside Health Services Agency
 Department of Environmental Health
 Hazardous Materials Management Division
Hazardous Waste Generator Inspection Report

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Facility Name	National RV				Page 1 of				
Street Address	100 South Sinclair				Date of Inspection	May 23, 2002			
City	Perris	Zip Code			# of Employees				
Business Contact					Business Phone #			Inspection Type	Routine
Health & Safety Code, Chapter 6.5 California Code of Regulations, Title 22 Riverside County Ordinance 615.3					Re-inspection Date				
Hazardous Waste Storage	Y	N	NA	Viol. Type	General Hazardous Waste Requirements	Y	N	NA	Viol. Type
100. Current Permit Ordinance 615.3 Facility ID # 89073		X			107. EPA ID# 22CCR66262.12(a)	X			
101 A. Accumulation Time 22CCR66262.34					108 A. Recyclable Hazardous Waste Managed H&SC 25143.2	X			
101 B. Satellite Accumulation Time 22CCR 66262.34(a)			X		108 B. Excluded Recyclable Materials H&SC 25143.2	X			
102 Incompatibles Segregated 22CCR66265.177	X			1 2 m	109. Storage / Treatment Authorized H&SC25201(a)	X			1 2 m
103 Containers					110. Access for Inspection H&SC 25195	X			1 2 m
A. Compatible With Waste 22CCR66265.172	X			1 2 m	111. Hazardous Waste Determination 22CCR66262.11	X			1 2 m
B. Labeled Properly 22CCR66262.34(f)(3)		X			Records Review				
C. Inspected Weekly 22CCR66262.174		X			112. Manifests 22CCR66262.20-23	X			
D. Good Condition 22CCR6626.171	X			1 2 m	113. Biennial and Exception Reports 22CCR66262.41	X			
E. Not Leaking 22CCR 66262.173(b)	X			1 2 m	114. Training Documentation Maintained and Available 22CCR66265.16			X	
F. Stored Closed 22CCR66265.173(a)		X		1 2 m	115. Waste Analysis 22CCR66262.40(c)	X			
G. Ignitable or Reactive Hazardous Wastes Stored at Least 50 ft From Property Line 22CCR66265.176	X				116. Hazardous Waste Source Reduction Requirements complete 22CCR67100.3	X			
H. Storage Area Inspected Weekly 22CCR66262.174		X			Transportation and Disposal				
I. Aisle Space 22CCR66264.35	X				117. Registered Transporter 22CCR66262.10	X			1 2 m
104. Aboveground Hazardous Waste Tank Systems					118. Disposed / Treated at an Authorized Location H&SC 25189.5	X			1 2 m
A. Operating Requirements 22CCR 66265.194		X			Management of Used Oil and Batteries				
B. Storage Area Inspected Daily 22CCR 66265.195		X			119. Used Oil Managed Properly H&SC 25250.4				
105. Preparedness, Prevention and Contingency Plan Prepared and Completed 22CCR66265.51					120. Used Oil Shipping Records CCR 66266.130(b)(3)	X			
A. Communications and Alarms 22CCR66265.34	X				121. Not Contaminated with Hazardous Waste H&SC25250.7	X			
B. Required Fire, Spill and Decontamination Equipment 22CCR66265.32		X			122. Filters Properly Managed 22CCR66266.130			X	
C. Testing of Fire, Spill and Decontamination Equipment 22CCR66265.33	X				123. Batteries Properly Managed 22CCR66266.81			X	
D. Emergency Response Procedures 22CCR66265.56	X				Other				
E. Arrangements with Local Authorities 22CCR66265.55	X				124. Tiered Permitting (Joint Inspection Required)				X
F. Evacuation Plan 22CCR66265.52(f)	X				125. SPCC Plan Complete (>660 gallon AGT or >1320 gallons aggregate H&SC25270.5 (c)				X
G. Emergency Coordinators Listed 22CCR 66265.55	X				126. Contaminated Rags H & SC 25270.5(c)				X
106. Maintained and Operated to Minimize the Possibility of Fire, Explosion, or Release 22CCR66265.31		X		1 2 m	127. Silver Only Waste H&SC 25143.23				X
					128. Universal Waste 22CCR66273				
					129. NPDES Information Provided	X			
					130.				

BOLD violations may be considered CLASS 1 violations and may be subject to legal and enforcement action.
 NOTICE OF VIOLATION: The violations noted above must be corrected within (30) days. Failure to comply may result in legal action.

Specialist: Paul Mitchell	Received by: [Signature]	Title: H. L. Manager
---------------------------	--------------------------	----------------------

National RV
100 Sinclair
Perris

Inspection report for May 22 and May 28, 2002

100 Current Permit Ordinance 615.3, Facility ID #: 89073

- a. National RV has not applied for their hazardous waste generator permit.

103 Containers:

- A. Compatible with waste 22 CCR 66265.172:
- B. Labeled Properly 22 CCR 66262.34(f)(3): different types of violations to this regulation were discovered during this inspection explained as follows:
 - a. Empty containers (2-55 gallon metal drums) with hazardous waste labels behind the paint booth located north side in Building 4.
 - b. 1-55 metal drums with hazardous waste label used to store trash behind the paint booth located north side in Building 4.
 - c. Hazardous waste containers without labels (2-55 gallon metal drums) at the entrance doorway to the paint booth north side in Building 4 and (approx. 2-55 gallon metal drums) outside west end of Building 4 next to used oil aboveground tank.
 - d. Hazardous waste containers with labels incorrectly filled out. (Bldg 4 - paint room, used oil, Building 5 - paint room, outside south storage area).
 - e. Building 5 drum container storage area outside south entry has numerous drums without labeling.
 - f. Hazardous waste containers with labels indicating collection date in excess of the 90 days (for example date of 04/01). Locations include Building 4 west outside area used oil storage, Building 4 north paint room.
 - g. Aboveground used oil tank (500 gallons) located outside Building 4 west end storage is without a label indicting the start date for accumulation.
 - h. Drum of hazardous waste with a funnel located at outside used oil storage Building 4 did not have a hazardous waste label.
 - i. 2- 5 gal jugs without labels located in north/west paint room of Building 4.
 - j. 2 stacked empty paint cans used to hold paint guns in Building 4 outside of paint room still with original label indicating flammable contents. .
 - k. A 5 gal open paint bucket containing an unknown liquid without a label in Building 5 west entry area between wood and metal assembly areas.

- l. Plastic unlabeled (approx 30 gal) trash containers located outside west entry Building 5 used to store empty spray cans.
 - m. Numerous unlabeled improper containers (i.e. water/soda bottles) located in Building 5 assembly areas with contents of containers unknown.
 - n. Unlabeled empty container holding area in Building 5 Receiving.
 - o. In Building 5 center area Sikkens paint mix station unlabeled full vs. empty paint can areas.
 - p. Unlabeled wood storage cart holding empty glue cylinders located at outside west lot between Building 4 & 5. Insure cylinders are all pierced properly – random piercing observed.
 - q. Unlabeled large plastic container holding used oil filters stored outside westend Building 4 by used oil tank.
 - r. Unlabeled battery storage area currently located on the west side center area outside of Building 4.
- C. Inspected weekly 22 CCR 6626.174:
- a. From this inspection it was evident that more frequent inspection of the hazardous waste storage areas is needed. It was not apparent that weekly inspections were conducted.
- D. Good Condition 22CCR 6626.171:
- E. Not leaking 22 CCR 6626.173(b):
- F. Stored Closed 22 CCR 66265.173(a)
- a. Hazardous waste drum on the west end behind Building 4 in the hazardous waste storage area has a funnel installed into the bung opening with no lid for the funnel.
 - b. A red plastic container or tray with an unknown waste was left on top of the drum referred to in item “a” of this section.
 - c. The hazardous waste drum for the paint waste located in building 4 north paint room area also has a funnel installed into the bung opening and its lid was not closed.
 - d. The hazardous waste paint drum in Building 5 adjacent to the only operational paint booth has a funnel installed into its bung with its lid open.
 - e. A 5 gal paint bucket sitting on top of closed bucket located in Building 5 west entry between metal and wood assembly areas found open containing a black unknown liquid.
- G. Ignitable or Reactive Hazardous Waste Stored at Least 50 feet from property lines: 22 CCR 66265.176:
- H. Storage area inspected weekly 22 CCR 66262.174:
- a. As stated in item “C” of this section I could not confirm that hazardous waste storage areas were inspected weekly. The photograph of the crushed filters shows that trash is also being stored with the waste filters inside of the bin.
- I. Aisle space 22 CCR 66264.35:

- a. Aisle space was discovered to be adequate for areas surrounding the hazardous waste storage. A discussion of having the emergency hazardous waste response spill kit possible being block into the fenced area adjacent to the paint booth in Building 4 did take place, and the need to maintain the access is a high priority.

104 Aboveground Hazardous Waste Tank Systems

A. Operating Requirements 22 CCR 66265.194:

- a. The above ground used oil storage tank was labeled as being recycled oil. "Used Oil" has in the recent past been labeled as "waste oil" but never has "used oil" had the title of "recycled oil". This above ground storage tank is required to be labeled USED OIL.
- b. See item "g" of section 103 B for failure to place the accumulation date label onto the above ground Used Oil tank.

105 Preparedness, Prevention and 106 Maintained and operated to minimize the possibility of fire, explosion or release 22 CCR 66265.31:

B. Required Fire, Spill and Decontamination Equipment 22 CCR 66265.32:

- a. Unlabeled outside of Building as to where eyewash is located behind entry door at south entry Building 5.

106 Maintained and operated to minimize the possibility of fire, explosion or release 22 CCR 66265.31:

- a. Red plastic tray containing the unknown hazardous waste setting on top of hazardous waste drum is not a secure means of storage.
- b. The three hazardous waste drums with the open funnels are used to store flammable waste paint related material. These containers are required to be sealed to prevent the release of the flammable vapors which could come in contact with a ignition source or if tipped could release the contained liquid.

General Hazardous Waste Requirements

Records Review

114 Training Documentation Maintained and Available 22 CCR 66265.16:

- a. Written records of employee training are available for review and copies of the monthly safety meetings were inspected.
- b. The employee work practices indicate that more work is required to make the training meet the actual needs of National RV in meeting the actual training requirements. The need to have a new employee position that clears the trash of possible hazardous waste is a good indication of the continued need to train the employees in hazardous materials and waste practices. Another indicator for additional training would be the used of drinking water containers for storage of unknown chemicals used in the manufacturing process.

Management of Used Oil and Batteries

122 Filters Properly Managed 22 CCR 66266.130:

- a. Refer to sections 103 B "p" and 103 H

123 Batteries properly managed 22 CCR 66266.81:

- a. Refer to sections 103 B "q" and 112

NOTES:

The section below is additional information related to the Business Emergency Plan Inspection conducted at the same time as the generator inspection.

BEP Violations

A. NFPA signs: Provide NFPA 704 signage indicating highest level of hazard in all areas where hazardous materials are stored including the following locations:

- b. Propane tank located at east end of facility outside of office doors
- c. South entrance into hanger work areas of Building 4
- d. Northwest paint room of Building 4
- e. Sikkens paint mix area within Building 5 center area
- e. Building 5 south side outside drum storage area

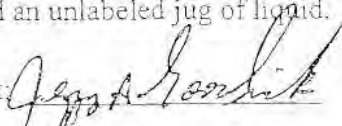
B. When using grounding straps on metal drums maintain the grounding straps are used correctly to ensure proper function. At time of inspection grounding straps on Building 4/5 drum storage areas were not attached correctly.

C. Cleaning solvent cans stacked at Building 5 paint room are stacked too high and are unstable. Maintain proper storage of containers to prevent tip over and possible spillage.

D. Cylinder storage area outside west entry of Building 5: Cylinders were not secured, empty cylinders were stored with full cylinders, and top missing of one cylinder. Maintain all cylinders are properly secured to prevent tip over, that all cylinders are intact, and empty should be stored separated from full cylinder containers.

E. Incompatibles Segregated: A cardboard box containing small paint cans located in Building 4 north paint room area also contained a partially full container of MEKP- 30 (organic peroxide) and an unlabeled jug of liquid.

Signature of Recipient:



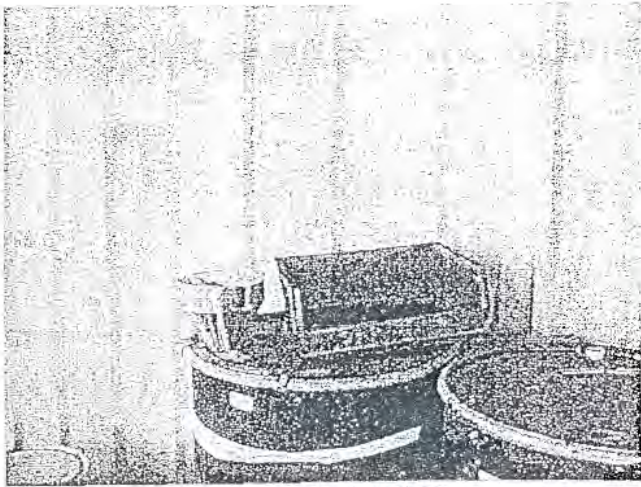
Title of Recipient:

H.R. MANAGER

Date received:

6-5-02

National RV
 100 South Sinclair
 Perris, Ca. 92571



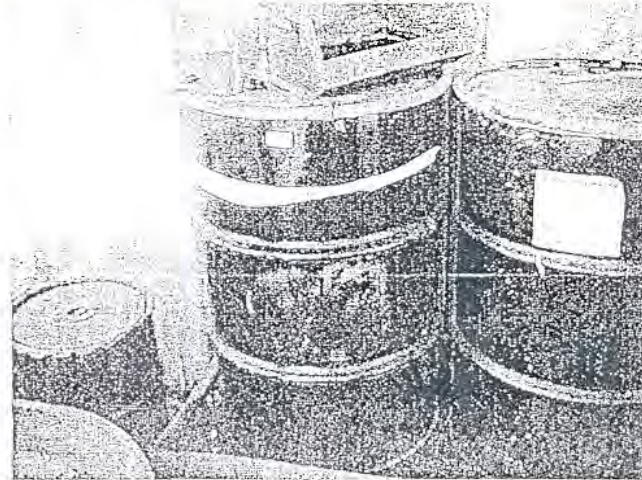
103 B (h), 103 F(a), 106 (g)



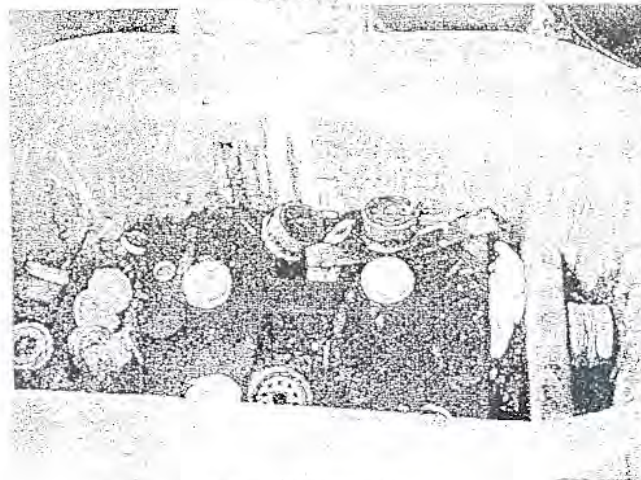
103 B(i)



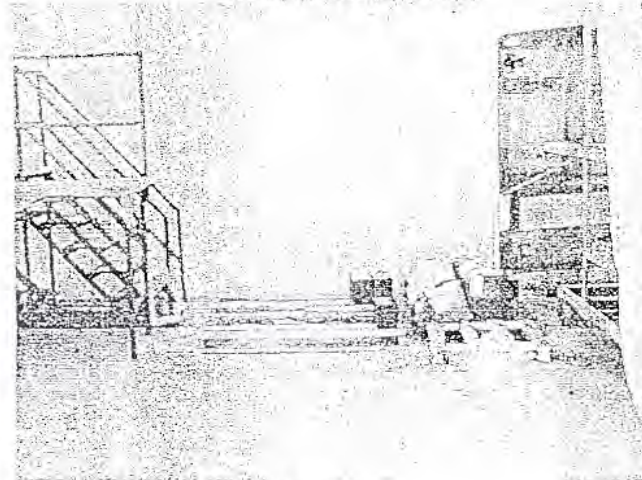
103 B(f)



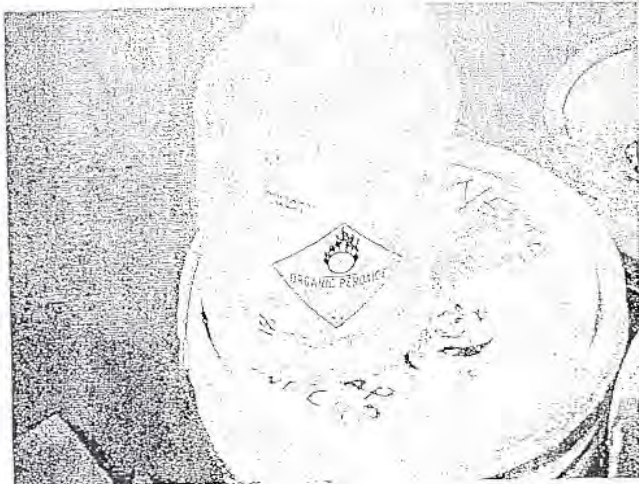
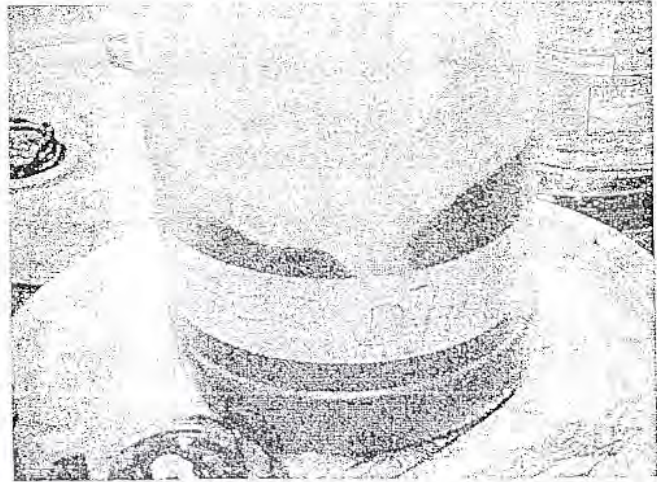
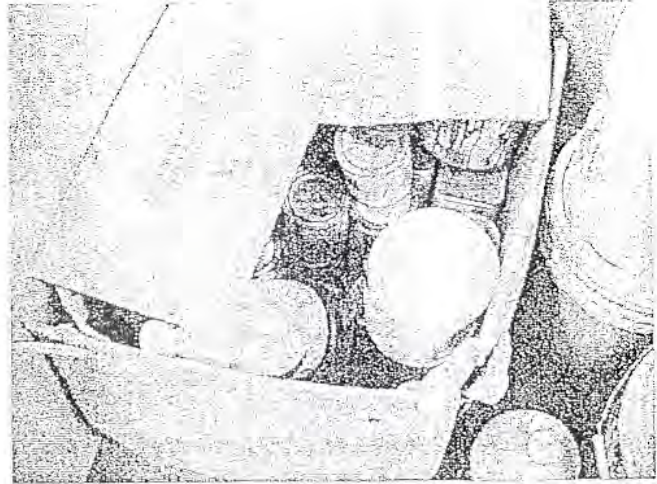
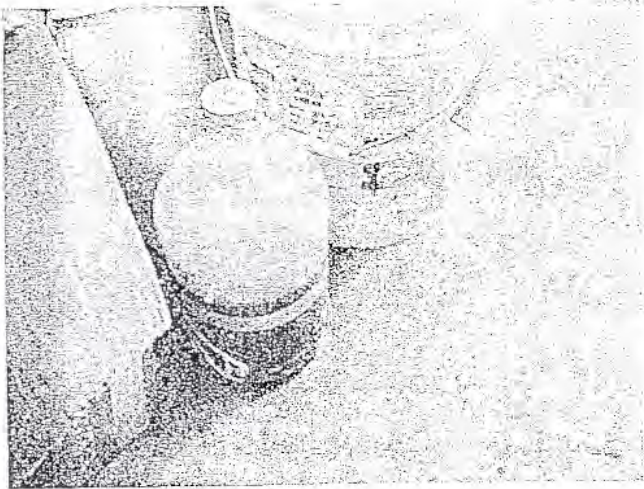
103B(h), 103F(b), 106(a)



103 B(q), 103H(e), 122



103B(r), 123



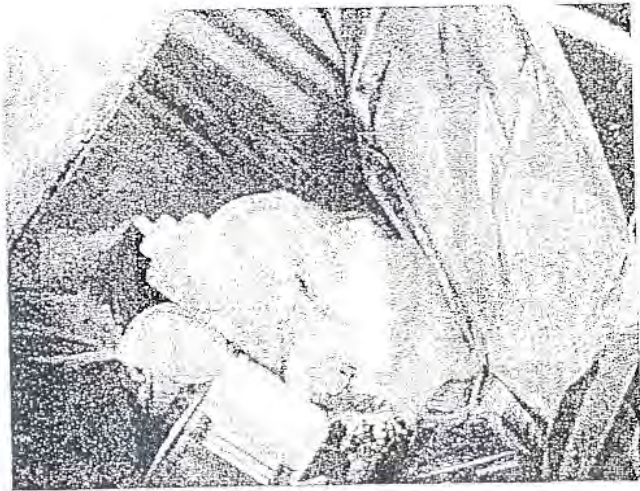
103 B(a), 103 B (d), 103 B(f)

FEDERAL LAW PROHIBITS IMPROPER DISPOSE
 IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC'S
 AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION

GENERATOR INFORMATION:
 NAME *National*
 ADDRESS *101 W. 33rd St* PHONE *303-733-1234*
 CITY *Rocky Mts* STATE *CO* ZIP *80521*
 EPA ID NO. / MANIFEST DOCUMENT NO. *7601 / 132*
 ACCUMULATION START DATE *11-1-87* EPA WASTE NO. *132*
 (DATE OF PROPER SHIPPING NAME AND HW OR OR NO WITH EHEP)

HANDLE WITH CARE!

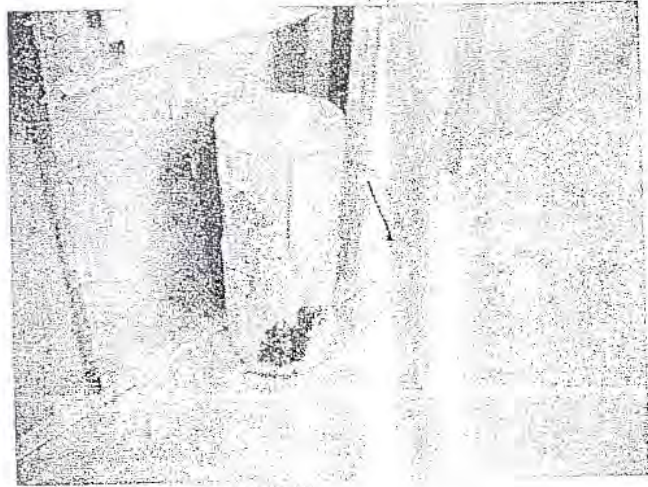
103 B(a), 103 B(d), 103 B(f)



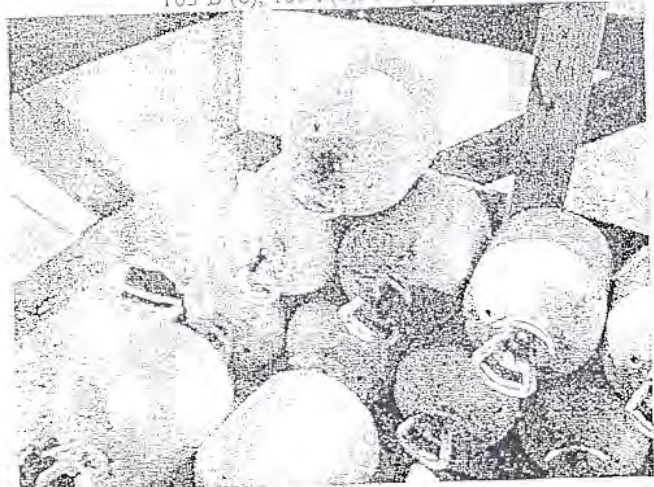
103 B(b)



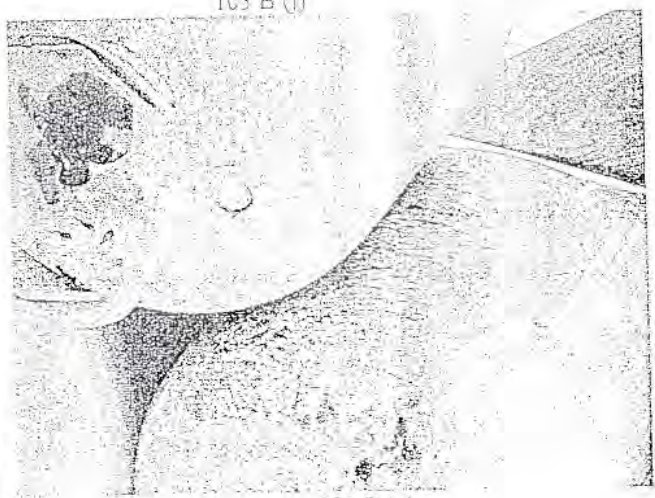
103 B(c), 103 F(c), 106(b)



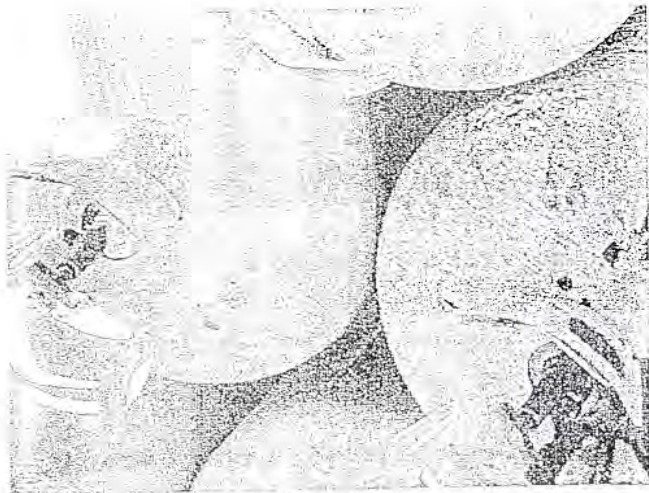
103 B(i)



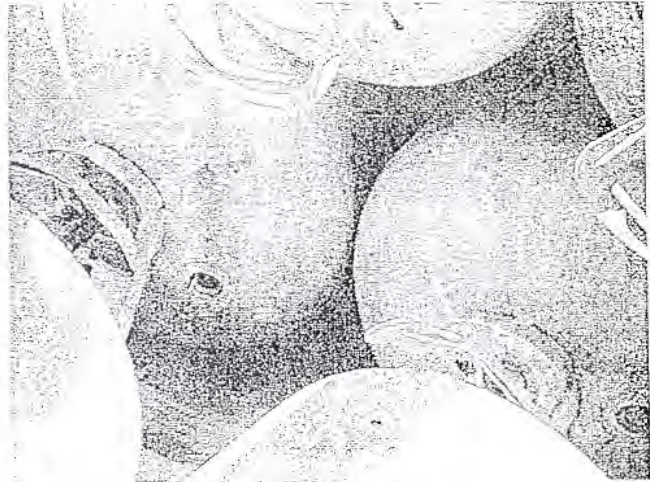
103 B(p)



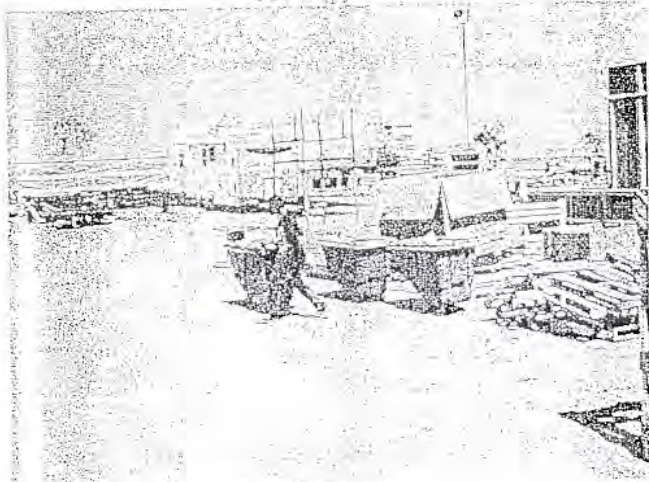
103 B(p)



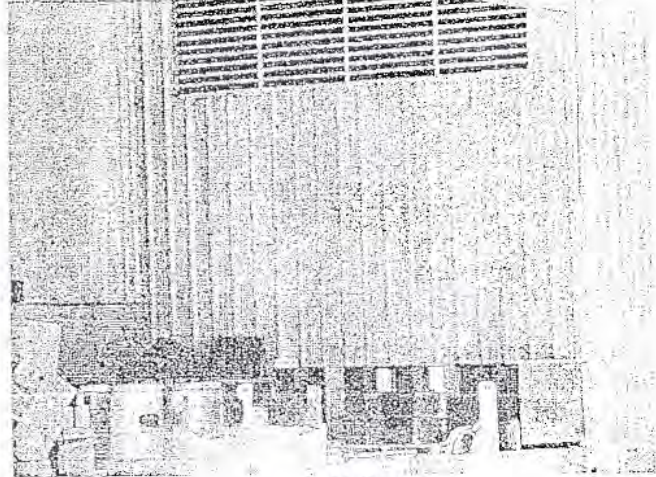
103 B (p)



103 B (p)



Waste Screening Area



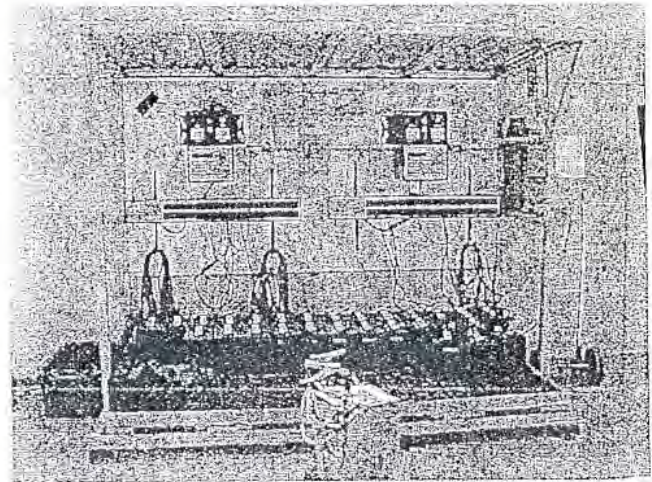
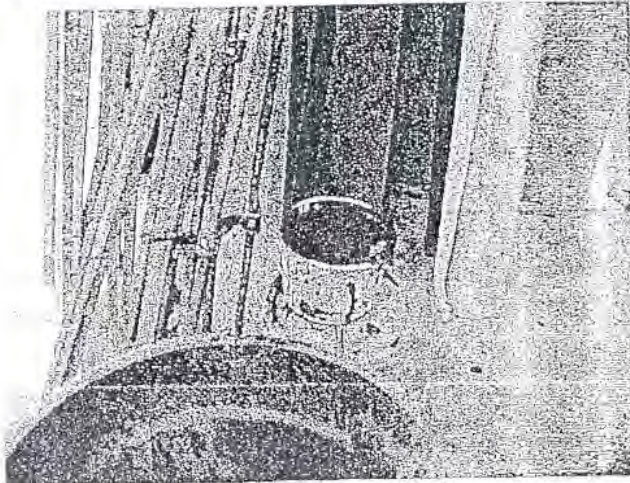
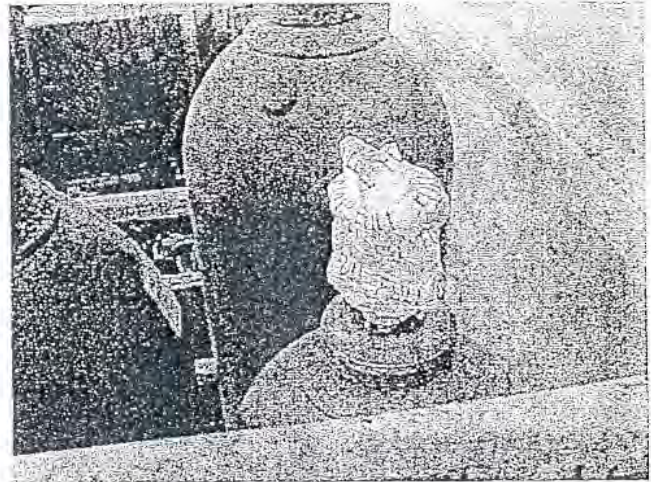
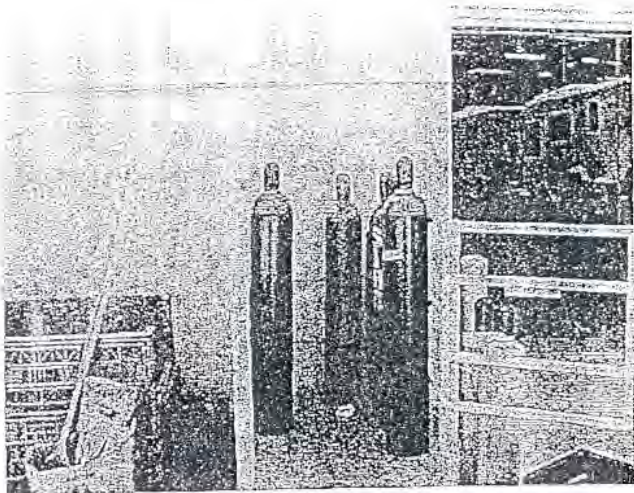
103 B (e)



103 B (d)



103 B (d)



103 B (k), 103 F (e)



County of Riverside Health Services Agency
 Department of Environmental Health
 Hazardous Materials Management Division
Business Emergency Plan Inspection Report

10/24/03
 8

Facility Name: National RV Date: May 22 2002
 Address: 100 South Sinclair Inspection: Routine Follow-Up
 City: Peris Zip Code: _____ Facility #: 89073
 Contact Person: _____ Telephone: _____

Riverside County Ordinance 651 California Code of Regulations TITLE 19 Health & Safety Code Chapter 6.95

Yes No N/A Items marked "No" are violations of the above referenced codes and must be corrected as follows:

Yes	No	N/A	Items marked "No" are violations of the above referenced codes and must be corrected as follows:
			I. Permit
<input checked="" type="checkbox"/>			A. Current Permit
			II. Business Emergency Plan
<input checked="" type="checkbox"/>			A. Approved Plan on Site and Available for Review
<input checked="" type="checkbox"/>			B. Plan Updated Within Last 2 Years
			III. Chemical Inventory Disclosure
<input checked="" type="checkbox"/>			A. Chemical Inventory Complete
<input checked="" type="checkbox"/>			B. Inventory Updated Annually
			IV. Emergency Response Plans and Procedures
<input checked="" type="checkbox"/>			A. Mitigation, Prevention, Abatement Measures
	<input checked="" type="checkbox"/>		B. Documented Employee Training
<input checked="" type="checkbox"/>			C. Evacuation Plan with Routes
<input checked="" type="checkbox"/>			D. Facility Map showing Location of Chemicals
			V. Posting
	<input checked="" type="checkbox"/>		A. Entrance and Exits Posted
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		B. Emergency Phone Numbers Posted
	<input checked="" type="checkbox"/>		C. Hazardous Materials Storage Area Posted
<input checked="" type="checkbox"/>			D. Emergency Equipment Posted
	<input checked="" type="checkbox"/>		E. Pesticide Storage Area Posted
			VI. Storage
	<input checked="" type="checkbox"/>		A. Maintained to Minimize Possibility of Release
	<input checked="" type="checkbox"/>		B. Handling Areas Secured
	<input checked="" type="checkbox"/>		C. Incompatibles Stored Separately
	<input checked="" type="checkbox"/>		D. Containers Properly Labeled

The above noted violations shall be corrected within 30 days.

Received by: _____
 Signature: [Signature]
 Print Name: Jessie A Goodrick
 Print Title: H.R. Manager

Specialist: Paul M. Adams

Riverside Office
 4065 County Circle Drive
 Riverside, CA 92503
 (909) 358-5055

Indio Office
 47923 Oasis Street, Room E4
 Indio, CA 92201
 (619) 863-8976

San Jacinto Office
 1370 S. State Street, Room 101
 San Jacinto, CA 92583
 (909) 654-3878

National RV
100 South Sinclair and 3411 North Perris Blvd.
Perris, Ca. 92571

Business Emergency Plan

- Placement of NFPA 704M signage: Both facilities need to have the NFPA 704M signage installed where chemical storage exceeds the limits as defined within the requirements of the federal, state and local permitting requirements. In area where I have previously seen these signs (hazardous materials/waste storage area) the NFPA 704M signs were not present for this inspection. In the new area of the facility the signs were not as yet installed.
- Chemical storage needs to be worked on in both facilities. A common problem with the storage is the unstable stacking of the hazardous chemicals. An example of this is the storage of five-gallon containers in stacks of three or more. The higher the stack the more pronounced the tilting of the upper levels becomes. An easy correction for this type of problem is to place a pallet between the levels as normally seen within the chemical handling industry.
- Chemical storage of incompatible chemicals was discovered within the fire cabinets and other areas. Flammable liquids and oxidizers are generally known to be incompatible and require a physical separation in case of a leak/release. MEKP and flammable paints are such a combination of incompatible chemicals. Resins and MEKP are another such combination that was seen being stored within the same area and having no physical separation.
- Within many of the wood working areas and other assembly areas what appeared to be water bottles containing a solution that is not water (white opaque liquid). As I did witness containers were supplied and very nice labels are made available for the employees. As many of the containers were in correctly labeled it would appear that more training is required to get the few employees that use an inappropriate container to take steps to correct this problem. It is recommended that food and drink containers that may be used inappropriately be banned from the work area.
- Within the laminating area of the RV assembly area, there are drums without labels visible or any other signage indicating the material being stored. Other areas also had similar problems with containers in use that the labels are not visible. Signage over the drums would correct this problem.
- Mobil fuel tanks were seen with masking tape labels. The masking tape labels need to be replaced with a better signage as making tape is too easy to remove by just brushing up to the container or the contained product dissolving the adhesive material from the tape backing.
- In the research/development area the storage of hazardous materials is a problem relating to incompatible storage and labeling. From the discussion while we were in the area it may be best to reduce the total volume of chemical storage and to redesign the chemical storage area to meet the overall needs of the department.
- The fiberglass molding area needs to be checked daily as the incompatible chemicals (MEKP and resins) are normally used in this area. House keeping for the chemical storage is of great concern and the need to provide NFPA 704

signage is required. The danger of fire from the reaction of the resin with the MEKP needs to be stressed with the employees who did not want to speak English or take direction from supervision in English. This area of operation can be very dangerous if communication problem exist between the supervisors and employees.

- Storage of compress gas cylinders has two problems discovered during this inspection. The first is the securing of the cylinders to a fixed object or mobile unit, and the second problem is several cylinders did not have their protective caps installed. As in the past the cylinders being secured are a problem that requires National RV to take corrective steps now. The receiving of cylinders with the shrink rap over the valve is not a substitute for the protective cap. National RV should accept no cylinder from the supplier until all caps are correctly installed on the cylinder. When the useful life of the cylinder has been reached then the cylinder should be removed from operation and its protective cap replaced. The useful life of a cylinder does not mean that cylinder does not have pressure but that for its intended use the gas being provided does not meet the required volume. All cylinders are to be secured when not being physically transferred. The physically transferred portion means the person who is transferring is actually involved of the transfer and has not started another project, taken a break or other activity. Cylinders should not be left standing for any extended period of time. See the OSHA requirements for how to correctly handle compress gas cylinders.
- As recommended in the past empty containers should be collected into an area where signage is present to indicate the containers are empty. Having containers that are empty, partial and full all in the same location is confusing to the responders as well as the employees.

National RV has shown signs of trying to reach compliance but more work is required. Training of the employees is greatly needed to prevent the items being addressed from being future problems. A recommendation for National RV would be to have more staff assigned to environmental compliance or a staff person who's sole purpose is to insure compliance. OSHA requires that any person working with hazardous waste have their 40 hours Hazwopper training and this would include the waste inspectors National RV is currently employing.

The label stations National RV has designed are some of the best I have seen with the MSDS materials being located at these stations. Continued work is needed to make these stations effective as the employees are not all using these stations.

The stopping the compress gas can puncturing is a step taken in the right direction. The search for an expectable alternative is another reminder that National RV wants to comply when given information on when corrective action is needed. National RV should investigate if the glue cylinders and aerosol canister will required the use of the collection device per South Coast Air Quality Management District.

Signature of Recipient: Joseph A. Goodrich

Title of Recipient: H.R. MANAGER

Date received: 6-5-02



Certified Unified Program Agency
 County of Riverside Community Health Agency
 Department of Environmental Health Hazardous Materials Management Division
 Hazardous Materials Handler Inspection Report

JM

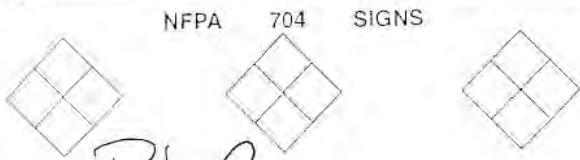
Facility Name: National RV Date: 4/21/05
 Address: 100 W. Sinclair Inspection: Routine Reinspection
 City: Perris Zip Code: 92571 Level: 3 Facility #: 89073
 Contact Person: Jon Morgan Number of Employees: 300 Telephone: 943-6007

Riverside County Ordinance 651 California Code of Regulations Title 19 Health & Safety Code Chapter 6.95 California Fire Code

Y	N	N/A	Item marked "No" are violations of the above-referenced codes and must be corrected as follows:	
<input checked="" type="checkbox"/>			100. Current Permit	(BEP)
			101. Hazardous Materials Business Emergency Plan	101, 102 - Business Emergency Plan not readily available for review at the time of inspection.
	<input checked="" type="checkbox"/>		A. Approved Plan on Site and Available for Review	
	<input checked="" type="checkbox"/>		B. Plan Updated within Past 3 Years	
			102. Chemical Inventory Disclosure	
	<input checked="" type="checkbox"/>		A. Chemical Inventory Complete	103 - See photographic Report. Employee training shall be performed on hazardous materials management practices
	<input checked="" type="checkbox"/>		B. Inventory Updated Annually	
			103. Emergency Response Plans and Procedures	
	<input checked="" type="checkbox"/>		A. Prevention, Mitigation and Abatement Measures	
	<input checked="" type="checkbox"/>		B. Documented Employee Training	104. NFPA 704 signs either missing or improperly numbered at various locations
<input checked="" type="checkbox"/>			C. Evacuation Plan with Routes	See photographic Report.
	<input checked="" type="checkbox"/>		D. Facility Map with Location of Chemicals	
<input checked="" type="checkbox"/>			E. MSDS Available	
			104. Posting	105. Various containers with hazardous materials left open and not maintained to prevent spillage or release. See photo Report.
	<input checked="" type="checkbox"/>		A. NFPA 704 Sign(s) Posted	
<input checked="" type="checkbox"/>			B. Emergency Phone Numbers Posted	
<input checked="" type="checkbox"/>			C. Hazardous Materials Storage Area Posted	
<input checked="" type="checkbox"/>			D. Emergency Equipment Posted	
		<input checked="" type="checkbox"/>	E. Pesticide Storage Area Posted	* Received copies of B.E.P during writeup via electronic copies. Items 101, 102 corrected.
			105. Storage	
	<input checked="" type="checkbox"/>		A. Maintained to Minimize the Possibility of Release	
	<input checked="" type="checkbox"/>		B. Handling Areas Secured	
<input checked="" type="checkbox"/>			C. Incompatibles Stored Separately	
	<input checked="" type="checkbox"/>		D. Containers Properly Labeled	
			106. Other	

The above noted violations shall be corrected within 15 days.

Received by: *Jon Morgan*
 Print Name: Jon Morgan
 Title: FACILITY MANAGER

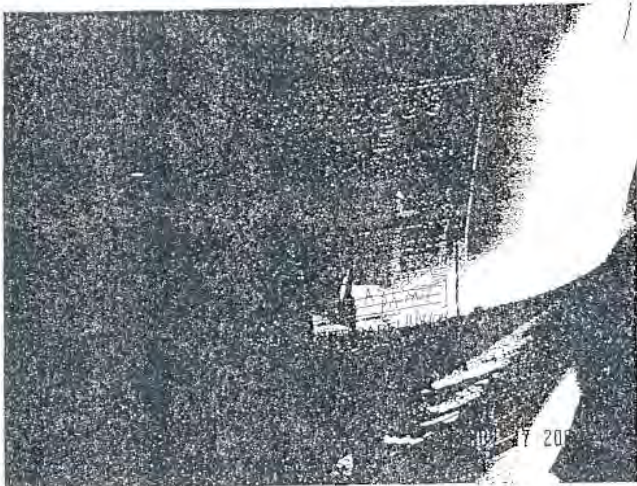


Specialist: Rich Guerrero

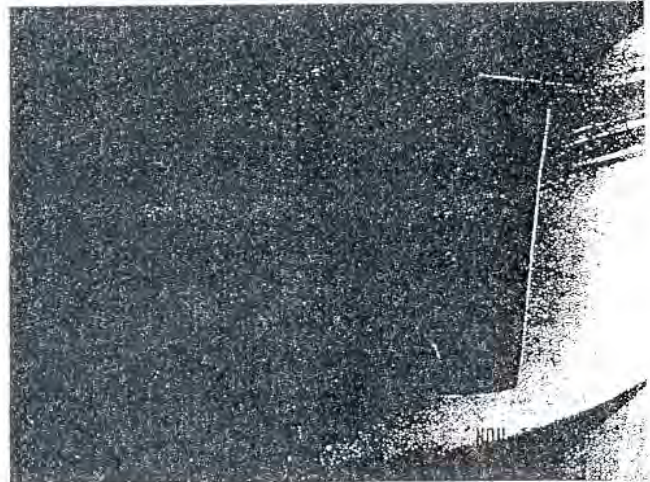
Riverside Office (951) 358-5055
 P.O. Box 7489
 Riverside, CA 92513-7489

Indio Office (760) 863-8975
 47-923 Oasis Street, Rm. E-4
 Indio, CA 92201

Hemet Office (951) 766-6524
 800 S. Sanderson Avenue
 Hemet, CA 92545



Label with Accumulation Date not correctly filed out



Old Haz Waste label expired

- Some NFPA 704 signs are placed in correct locations but not all of the sites where chemicals are stored have the signs in place.
- The hazardous waste labels are to have some if not all of the information filled in and the information is to be placed in the correct location of the label such as the Accumulation Date.
- Containers of hazardous materials are to be stored closed when not transferring the material. Within the paint area for example I have documented several 5 gallon containers and drums of hazardous waste that have a flammability property. Besides having problems with possible spillage the release of the flammable vapors from the containers which is a violation of AQMD and a possible increase of the fire hazard.
- The hazardous waste storage area has several areas of concern:
 - Drum with unknown material left opened.
 - Improper labeling of hazardous waste.
 - No label on the container.
 - Mixing of non-waste and hazardous waste.
- Container of "grease" was left opened and rain had entered as shown in the photograph.
- Oil had spilled or leaked from its containment onto a concrete pad.
- In the rear area some older storage of waste materials was discovered. One drum had a hazardous waste label but did not store any waste. The second container is a black plastic drum not labeled containing waste oil.
- One food "drink container" did not contain the liquid indicated on its label. This was a problem written up in the prior inspection 2003.

All containers that store a hazardous material are to be label with what is contained. The labels are to be easily read. The sub category of this is the hazardous waste which is required to be properly labeled at the time the first waste is placed into the container. The accumulation date is to be placed in the location provided on the label not in other areas of the label. If a satellite site is used then an agreed to area of the label for the start of the storage in the main hazardous waste is acceptable for the second date of storage.

The Division checks for how the chemicals are stored to include prevention of release to the environment or ease of spillage. Containers that are stored sealed prevent the release of the contents to the environment when

the container is tipped and turned on its side. In the case of flammable liquids the vapors of the contained product are also of concern to the Division. All containers are to be sealed when its contents are not being transferred. In the waste paint area the failure to use the pouring spout because it does not fit is not an acceptable reason for leaving open the drum. Leaving the top of the container open when not transferring the contained material is also a practice that needs to be corrected. The lids to the containers are to be seal or self closing then material is not being transferred.



Certified Unified Program Agency
County of Riverside Health Services Agency
Department of Environmental Health
Hazardous Materials Management Division
Hazardous Waste Generator Inspection Report

8-13-03
B

P

Facility Name: <u>National RV</u>				Page 1 of _____					
Street Address: <u>3411 North Perris Blvd</u>				Date of Inspection: <u>May 22 2002</u>					
City: <u>Perris</u>		Zip Code: _____		# of Employees: _____					
Business Contact: _____		Business Phone #: _____		Inspection Type: <u>Routine</u>					
Health & Safety Code, Chapter 6.5 California Code of Regulations, Title 22 Riverside County Ordinance 615.3				Re-inspection Date: _____					
Hazardous Waste Storage	Y	N	N/A	Viol. Type	General Hazardous Waste Requirements	Y	N	N/A	Viol. Type
100. Current Permit Ordinance 615.3 Facility ID # _____	X				107. EPA ID# _____ 22CCR66262.12(a)	X			
101 A. Accumulation Time 22CCR66262.34		X			108 A. Recyclable Hazardous Waste Managed H&SC 25143.2	X			
101 B. Satellite Accumulation Time 22CCR 66262.34(e)		X	X		108 B. Excluded Recyclable Materials H&SC 25143.2	X			
102 Incompatibles Segregated 22CCR66265.177				1 2 m	109. Storage / Treatment Authorized H&SC25201(a)	X			1 2 m
103 Containers					Records Review				
A. Compatible With Waste 22CCR66265.172	X			1 2 m	110. Access for Inspection: H&SC 25195	X			1 2 m
B. Labeled Property 22CCR66262.34(f)(3)		X			111. Hazardous Waste Determination 22CCR66262.11	X			1 2 m
C. Inspected Weekly 22CCR66262.174		X			112. Manifests 22CCR66262.20-23				
D. Good Condition 22CCR6626.171	X			1 2 m	113. Biennial and Exception Reports 22CR66262.41	X			
E. Not Leaking 22CCR 66262.173(b)	X			1 2 m	114. Training Documentation Maintained and Available 22CCR66265.16		X		
F. Stored Closed 22CCR66265.173(a)		X		1 2 m	115. Waste Analysis 22CCR66262.40(c)	X			
G. Ignitable or Reactive Hazardous Wastes Stored at Least 50 ft. From Property Line 22CCR66265.175	X				116. Hazardous Waste Source Reduction Requirements complete 22CCR67100.3	X			
H. Storage Area Inspected Weekly 22CCR66262.174		X			Transportation and Disposal				
I. Aisle Space 22CCR66264.95	X				117. Registered Transporter 22CCR66262.10	X			1 2 m
104. Aboveground Hazardous Waste Tank Systems					Management of Used Oil and Batteries				
A. Operating Requirements 22CCR 66265.194		X			118. Disposed / Treated at an Authorized Location H&SC 25189.5	X			1 2 m
B. Storage Area Inspected Daily 22CCR 66265.195		X			119. Used Oil Managed Properly H&SC 25250.4	X			
105. Preparedness, Prevention and Contingency Plan Prepared and Completed 22CCR66265.51					120. Used Oil Shipping Records CCR 66266.130(b)(3)				
A. Communications and Alarms 22CCR66265.34	X				121. Not Contaminated with Hazardous Waste H&SC25250.7	X			
B. Required Fire, Soil and Decontamination Equipment 22CCR66265.32	X				122. Filters Properly Managed 22CCR66265.130	X			
C. Testing of Fire, Spill and Decontamination Equipment 22CCR66265.33		X			123. Batteries Properly Managed 22CCR66265.81		X		
D. Emergency Response Procedures 22CCR66265.56	X				Other				
E. Arrangements with Local Authorities 22CCR66265.55	X				124. Tiered Permitting (Joint Inspection Required)				X
F. Evacuation Plan 22CCR66265.52(f)	X				125. SPCC Plan Complete (>660 gallon AGT or >1320 gallons aggregate H&SC25270.5 (c)				X
G. Emergency Coordinators Listed 22CCR 66265.55	X				126. Contaminated Rags H&SC 25270.5(c)				X
106. Maintained and Operated to Minimize the Possibility of Fire, Explosion, or Release 22CCR66265.31					127. Silver Only Waste H&SC 25143.23				
		X		1 2 m	128. Universal Waste 22CCR66273				X
					129. NPDES information Provided	X			
					130. _____				

BOLD violations may be considered CLASS 1 violations and may be subject to legal and enforcement action

NOTICE OF VIOLATION: The violations noted above must be corrected within (30) days. Failure to comply may result in legal action.

Specialist: <u>Paul Mitchem</u>	Received by: <u>[Signature]</u>	Title: <u>H.R. Manager</u>
---------------------------------	---------------------------------	----------------------------

OFFICES:
 Riverside
 (909)356-3055
 1065 County Circle Drive

Imperial
 (009)768-6524
 800 South Sanderson Ave.

Indio
 (760)863-8976
 47-823 Oasis St.

Inclusion: Waste Sites, Certified Operator, PMA Specialist

National RV
3411 North Perris Blvd.
Perris, Ca 92571

Inspection report for May 22 and May 28, 2002

103 Containers:

- A. Compatible with waste 22 CCR 66265.172:
- B. Labeled Properly 22 CCR 66262.34(f)(3): five different types of violations to this regulation were discovered during this inspection.
 - a. Red metal 55-gallon drum, a black metal 55-gallon drum and a 5-gallon container in the maintenance building has older hazardous waste label with an expired accumulation date.
 - b. Hazardous waste in storage area requires all containers to have proper labels. The use of toxic hazardous on the containers does not meet the requirements for proper labeling. Toxic waste was painted onto a 55-gallon metal drum and three trash bins. Several of the drums in the hazardous waste storage area did not have proper labels.
 - c. In the hazardous waste area it appears that paints are being transferred from their original container into another container that is not labeled. This unlabeled container must be assumed to be hazardous waste as the original container were already placed into the normal trash bins.
 - d. Some 55-gallon metal drums in the hazardous waste storage area were empty drums with hazardous waste labels. These drums were stacked on top of each other in an unsafe manner. The empty drums need to have their hazardous waste labels removed just after the contents have been transferred.
- C. Inspected weekly 22 CCR 6626.174:
 - a. If the hazardous waste storage area had been inspected on a weekly basis then the inappropriate labeling (toxic waste) would not have occurred or would have been corrected.
- D. Good Condition 22CCR 6626.171:
- E. Not leaking 22 CCR 6626.173(b):
- F. Stored Closed 22 CCR 66265.173(a):
 - a. In the hazardous waste storage and transfer area an open container of that appears to be paint is setting beside a pallet of paint containers air-drying. The removal of residual paint from these containers should be conducted in such a manner as to prevent the release of the collected materials into a properly labeled container.
- G. Ignitable or Reactive Hazardous Waste Stored at Least 50 feet from property lines: 22 CCR 66265.176:
- H. Storage area inspected weekly 22 CCR 66262.174:
 - a. See item 103 C and 103 F.
- I. Aisle space 22 CCR 66264.35:

104 Aboveground Hazardous Waste Tank Systems

A. Operating Requirements 22 CCR 66265.194:

- a. The above ground diesel tank has a secondary containment, which during this inspection was partially full of an unknown liquid. As it has not rained in several days the collected unknown liquid should have been removed from the secondary containment and properly disposed of in accordance with its chemical profile.

B. Storage area inspected daily 22 CCR 66265.195:

- a. If the above ground storage tank had been inspected daily then the large amount of unknown liquid would have been identified.

105 Preparedness, Presentation and Contingency Plan Prepared and Completed 22 CCR 66265.51:

C. Testing of Fire, Spill and Decontamination Equipment 22 CCR 66265.33:

- a. Fire hose was not in its storage cabinet outside of building 3, but was partially unrolled onto the ground. The storage of this type of fire hose does require the hose to be stored out of the direct sunlight as it damages the structural properties of the hose. Employees need to check the emergency equipment within their work area in a more timely fashion.

106 Maintained and operated to minimize the possibility of fire, explosion or release 22 CCR 66265.31:

- a. See item 103 B (c), and 103 F.

114 Training Documentation Maintained and Available 22 CCR 66265.16:

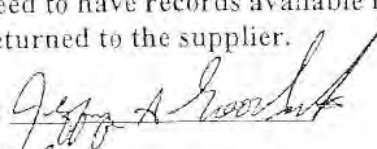
- a. Employees of National RV do receive training at the start of their employment but the level for some employees does not meet the standards for working with hazardous waste. Any person who searches inside of trash containers for hazardous waste needs to have the proper level of training and personnel protective equipment. The lack of proper training can be shown via the stenciling of Toxic Waste on to hazardous waste containers or the placing on a container of MEKP onto the roof of a building inside of the fiberglass production section.

Management of Used Oil and Batteries

123 Batteries properly managed 22 CCR 66266.81:

- a. Records for proper disposal of batteries were not available. The batteries need to have records available for returns as well as the used batteries returned to the supplier.

Signature of Recipient:



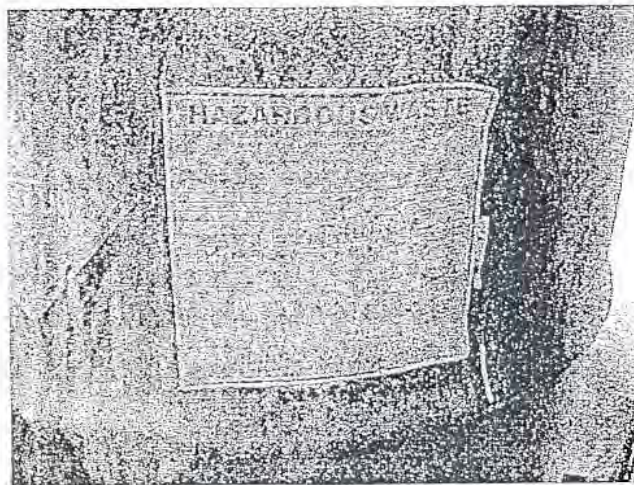
Title of Recipient:

H.C. MANAGER

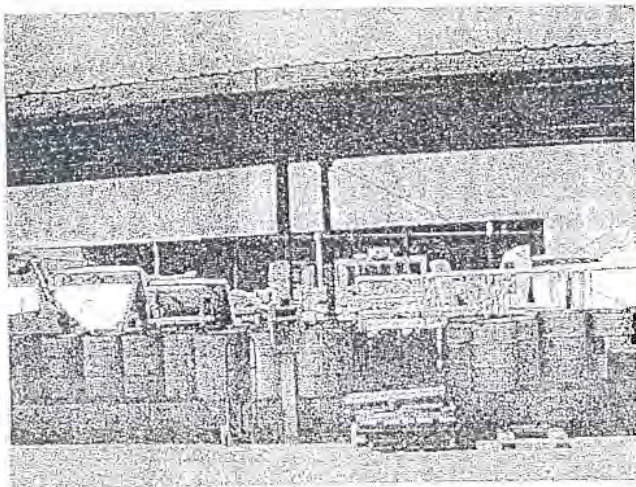
Date received:

6-5-02

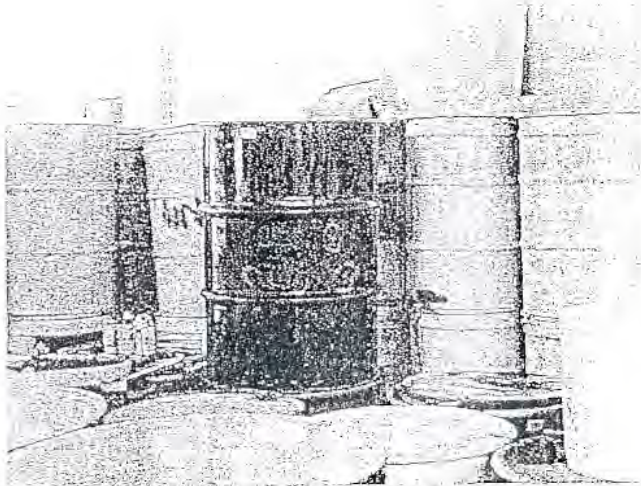
National RV
3411 North Perris Blvd.
Perris, Ca 92571



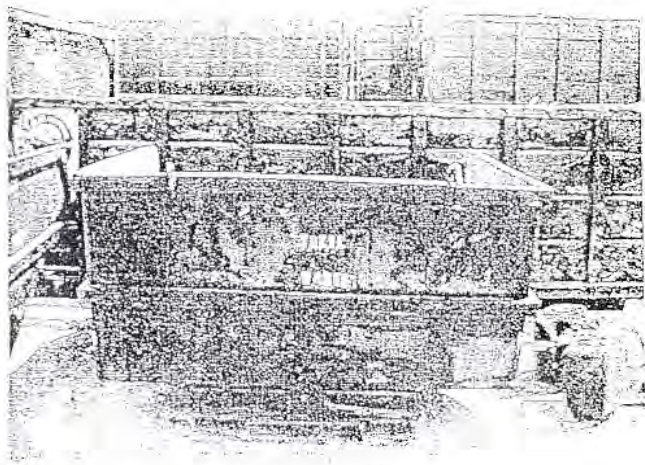
103 B (a)



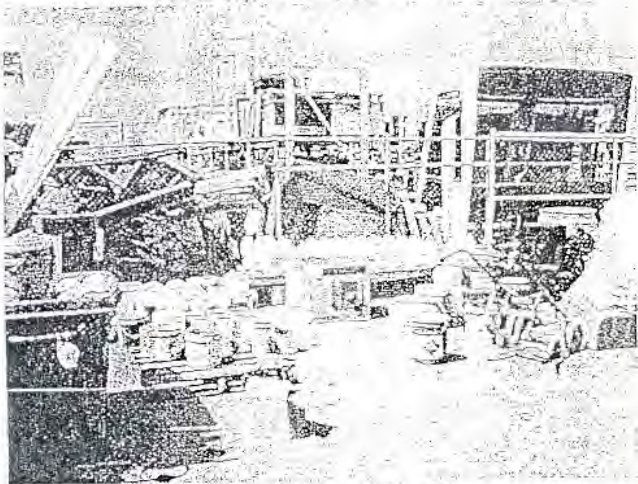
103 B (b), 114



103 B (b), 103 B (d), 103 C, 114



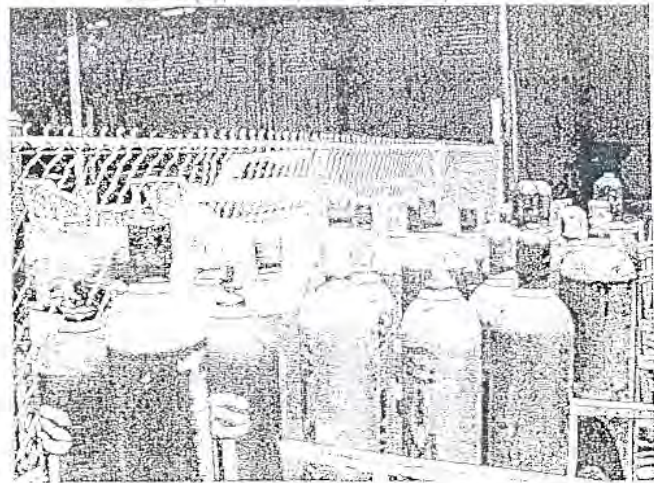
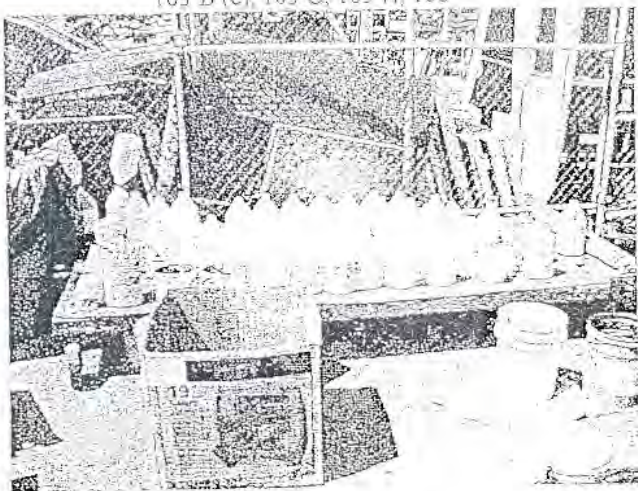
103 B (b), 103 C, 114



103 B (c), 103 C, 103 H, 106



103 B (c), 103 C, 103 F, 103 H, 106



File

County of Riverside
Department of Environmental health
Hazardous Materials Management Division

Enforcement Panel Referral

To: The Enforcement Panel

June 3, 2002

From: Paul Mitchell, Hemet Office

Re: Request for Enforcement Action

Request that you convene the Enforcement Panel for review of a potential enforcement action against:
National RV Inc.
3411 North Perris Blvd.
Perris

The following hazardous waste violations were found: See attached copy of the "Hazardous Waste Generator Inspection Report"

- Waste stored beyond allowable accumulation time.
- Waste containers not inspected weekly.
- Waste containers not stored closed.
- Storage area not inspected weekly.
- Waste containers not properly labeled.
- Waste containers not maintained and operated to minimize the possibility of a release.

Inspection report (copy), photographs, and file history are attached.



Certified Unified Program Agency
County of Riverside Health Services Agency
 Department of Environmental Health
 Hazardous Materials Management Division
Hazardous Waste Generator Inspection Report

Facility Name	National RV				Page 1 of				
Street Address	100 South Sinclair				Date of Inspection	May 23, 2007			
City	Perris	Zip Code			# of Employees				
Business Contact			Business Phone #			Inspection Type	Routine		
Health & Safety Code, Chapter 6.5 California Code of Regulations, Title 22 Riverside County Ordinance 615.3						Re-inspection Date			
Hazardous Waste Storage	Y	N	NA	Viol. Type	General Hazardous Waste Requirements	Y	N	NA	Viol. Type
100. Current Permit Ordinance 615.3 Facility ID # 89073		X			107. EPA ID#: 22CCR66262.12(a)	X			
101 A. Accumulation Time 22CCR66262.34					108 A. Recyclable Hazardous Waste Managed H&SC 25143.2	X			
101 B. Satellite Accumulation Time 22CCR 66262.34(e)			X		108 B. Excluded Recyclable Materials H&SC 25143.2	X			
102 Incompatibles Segregated 22CCR66265.177	X			1 2 m	109. Storage / Treatment Authorized H&SC25201(a)	X			1 2 m
103 Containers					110. Access for Inspection H&SC 25195	X			1 2 m
A. Compatible With Waste 22CCR66265.172	X			1 2 m	111. Hazardous Waste Determination 22CCR66262.11	X			1 2 m
B. Labeled Properly 22CCR66262.34(f)(3)		X			Records Review				
C. Inspected Weekly 22CCR66262.174		X			112. Manifests 22CCR66262.20-23	X			
D. Good Condition 22CCR66265.171	X			1 2 m	113. Biennial and Exception Reports 22CCR66262.41	X			
E. Not Leaking 22CCR 66262.173(b)	X			1 2 m	114. Training Documentation Maintained and Available 22CCR66265.16			X	
F. Stored Closed 22CCR66265.173(a)		X		1 2 m	115. Waste Analysis 22CCR66262.40(c)	X			
G. Ignitable or Reactive Hazardous Wastes Stored at Least 50 ft. From Property Line 22CCR66265.175	X				116. Hazardous Waste Source Reduction Requirements complete 22CCR67100.3	X			
H. Storage Area Inspected Weekly 22CCR66262.174		X			Transportation and Disposal				
I. Aisle Space 22CCR66264.35	X				117. Registered Transporter 22CCR66262.10	X			1 2 m
104. Aboveground Hazardous Waste Tank Systems					118. Disposed / Treated at an Authorized Location H&SC 25189.5	X			1 2 m
A. Operating Requirements 22CCR 66265.194		X			Management of Used Oil and Batteries				
B. Storage Area Inspected Daily 22CCR 66265.195		X			119. Used Oil Managed Properly H&SC 25250.4				
105. Preparedness, Prevention and Contingency Plan Prepared and Completed 22CCR66265.51					120. Used Oil Shipping Records CCR 66266.130(b)(3)	X			
A. Communications and Alarms 22CCR66265.34	X				121. Not Contaminated with Hazardous Waste H&SC25250.7	X			
B. Required Fire, Spill and Decontamination Equipment 22CCR66265.32		X			122. Filters Properly Managed 22CCR66265.130			X	
C. Testing of Fire, Spill and Decontamination Equipment 22CCR66265.33	X				123. Batteries Properly Managed 22CCR66266.31			X	
D. Emergency Response Procedures 22CCR66265.56	X				Other				
E. Arrangements with Local Authorities 22CCR66265.55	X				124. Tiered Permitting (Joint Inspection Required)			X	
F. Evacuation Plan 22CCR66265.52(f)	X				125. SPCC Plan Complete (>660 gallon AGT or >1320 gallons aggregate H&SC25270.5 (c)			X	
G. Emergency Coordinators Listed 22CCR 66265.55	X				126. Contaminated Rags H & SC 25270.5(c)			X	
106. Maintained and Operated to Minimize the Possibility of Fire, Explosion, or Release 22CCR66265.31		X		1 2 m	127. Silver Only Waste H&SC 25143.23			X	
					129. Universal Waste 22CCR66273				
					129. NPDES Information Provided	X			
					130.				

BOLD violations may be considered CLASS 1 violations and may be subject to legal and enforcement action.

NOTICE OF VIOLATION: The violations noted above must be corrected within 30 days. Failure to comply may result in legal action.

Specialist: <u>Paco Mitchell</u>	Received by:	Title:
----------------------------------	--------------	--------

San Diego Permit Office
OFFICES:

Riverside
(909)358-5055
4065 County Circle Drive
Perris, CA 92507

Hamst
(909)766-6524
300 South Sanderson Ave.
Perris, CA 92507

Indio
(760)563-8976
47-923 Oasis St.

Distribution: Waste Officer, County Waste Officer, Permit Specialist

National RV
100 Sinclair
Perris

Inspection report for May 22 and May 28, 2002

100 Current Permit Ordinance 615.3, Facility ID #: 89073

- a. National RV has not applied for their hazardous waste generator permit.

103 Containers:

- A. Compatible with waste 22 CCR 66265.172:
- B. Labeled Properly 22 CCR 66262.34(f)(3): different types of violations to this regulation were discovered during this inspection explained as follows:
 - a. Empty containers (2-55 gallon metal drums) with hazardous waste labels behind the paint booth located north side in Building 4.
 - b. 1-55 metal drums with hazardous waste label used to store trash behind the paint booth located north side in Building 4.
 - c. Hazardous waste containers without labels (2-55 gallon metal drums) at the entrance doorway to the paint booth north side in Building 4 and (approx. 2-55 gallon metal drums) outside west end of Building 4 next to used oil aboveground tank.
 - d. Hazardous waste containers with labels incorrectly filled out. (Bldg 4 - paint room, used oil, Building 5 - paint room, outside south storage area).
 - e. Building 5 drum container storage area outside south entry has numerous drums without labeling.
 - f. Hazardous waste containers with labels indicating collection date in excess of the 90 days (for example date of 04/01). Locations include Building 4 west outside area used oil storage, Building 4 north paint room.
 - g. Aboveground used oil tank (500 gallons) located outside Building 4 west end storage is without a label indicting the start date for accumulation.
 - h. Drum of hazardous waste with a funnel located at outside used oil storage Building 4 did not have a hazardous waste label.
 - i. 2- 5 gal jugs without labels located in north/west paint room of Building 4.
 - j. 2 stacked empty paint cans used to hold paint guns in Building 4 outside of paint room still with original label indicating flammable contents.
 - k. A 5 gal open paint bucket containing an unknown liquid without a label in Building 5 west entry area between wood and metal assembly areas.

- l. Plastic unlabeled (approx 30 gal) trash containers located outside west entry Building 5 used to store empty spray cans.
- m. Numerous unlabeled improper containers (i.e. water/soda bottles) located in Building 5 assembly areas with contents of containers unknown.
- n. Unlabeled empty container holding area in Building 5 Receiving.
- o. In Building 5 center area Sikkens paint mix station unlabeled full vs. empty paint can areas.
- p. Unlabeled wood storage cart holding empty glue cylinders located at outside west lot between Building 4 & 5. Insure cylinders are all pierced properly – random piercing observed.
- q. Unlabeled large plastic container holding used oil filters stored outside west end Building 4 by used oil tank.
- r. Unlabeled battery storage area currently located on the west side center area outside of Building 4.

C. Inspected weekly 22 CCR 6626.174:

- a. From this inspection it was evident that more frequent inspection of the hazardous waste storage areas is needed. It was not apparent that weekly inspections were conducted.

D. Good Condition 22 CCR 6626.171:

E. Not leaking 22 CCR 6626.173(b):

F. Stored Closed 22 CCR 66265.173(a)

- a. Hazardous waste drum on the west end behind Building 4 in the hazardous waste storage area has a funnel installed into the bung opening with no lid for the funnel.
- b. A red plastic container or tray with an unknown waste was left on top of the drum referred to in item “a” of this section.
- c. The hazardous waste drum for the paint waste located in building 4 north paint room area also has a funnel installed into the bung opening and its lid was not closed.
- d. The hazardous waste paint drum in Building 5 adjacent to the only operational paint booth has a funnel installed into its bung with its lid open.
- e. A 5 gal paint bucket sitting on top of closed bucket located in Building 5 west entry between metal and wood assembly areas found open containing a black unknown liquid.

G. Ignitable or Reactive Hazardous Waste Stored at Least 50 feet from property lines: 22 CCR 66265.176:

H. Storage area inspected weekly 22 CCR 66262.174:

- a. As stated in item “C” of this section I could not confirm that hazardous waste storage areas were inspected weekly. The photograph of the crushed filters shows that trash is also being stored with the waste filters inside of the bin.

I. Aisle space 22 CCR 66264.35:

- a. Aisle space was discovered to be adequate for areas surrounding the hazardous waste storage. A discussion of having the emergency hazardous waste response spill kit possible being block into the fenced area adjacent to the paint booth in Building 4 did take place, and the need to maintain the access is a high priority.

104 Aboveground Hazardous Waste Tank Systems

A. Operating Requirements 22 CCR 66265.194:

- a. The above ground used oil storage tank was labeled as being recycled oil. "Used Oil" has in the recent past been labeled as "waste oil" but never has "used oil" had the title of "recycled oil". This above ground storage tank is required to be labeled USED OIL.
- b. See item "g" of section 103 B for failure to place the accumulation date label onto the above ground Used Oil tank.

105 Preparedness, Prevention and 106 Maintained and operated to minimize the possibility of fire, explosion or release 22 CCR 66265.31:

B. Required Fire, Spill and Decontamination Equipment 22 CCR 66265.32:

- a. Unlabeled outside of Building as to where eyewash is located behind entry door at south entry Building 5.

106 Maintained and operated to minimize the possibility of fire, explosion or release 22 CCR 66265.31:

- a. Red plastic tray containing the unknown hazardous waste setting on top of hazardous waste drum is not a secure means of storage.
- b. The three hazardous waste drums with the open funnels are used to store flammable waste paint related material. These containers are required to be sealed to prevent the release of the flammable vapors which could come in contact with a ignition source or if tipped could release the contained liquid.

General Hazardous Waste Requirements

Records Review

114 Training Documentation Maintained and Available 22 CCR 66265.16:

- a. Written records of employee training are available for review and copies of the monthly safety meetings were inspected.
- b. The employee work practices indicate that more work is required to make the training meet the actual needs of National RV in meeting the actual training requirements. The need to have a new employee position that clears the trash of possible hazardous waste is a good indication of the continued need to train the employees in hazardous materials and waste practices. Another indicator for additional training would be the used of drinking water containers for storage of unknown chemicals used in the manufacturing process.

Management of Used Oil and Batteries

122 Filters Properly Managed 22 CCR 66266.130:

- a. Refer to sections 103 B "p" and 103 H

123 Batteries properly managed 22 CCR 66266.81:

- a. Refer to sections 103 B "q" and 112

NOTES:

The section below is additional information related to the Business Emergency Plan Inspection conducted at the same time as the generator inspection.

BEP Violations

A. NFPA signs: Provide NFPA 704 signage indicating highest level of hazard in all areas where hazardous materials are stored including the following locations:

- b. Propane tank located at east end of facility outside of office doors
- c. South entrance into hanger work areas of Building 4
- d. Northwest paint room of Building 4
- e. Sikkens paint mix area within Building 5 center area
- c. Building 5 south side outside drum storage area

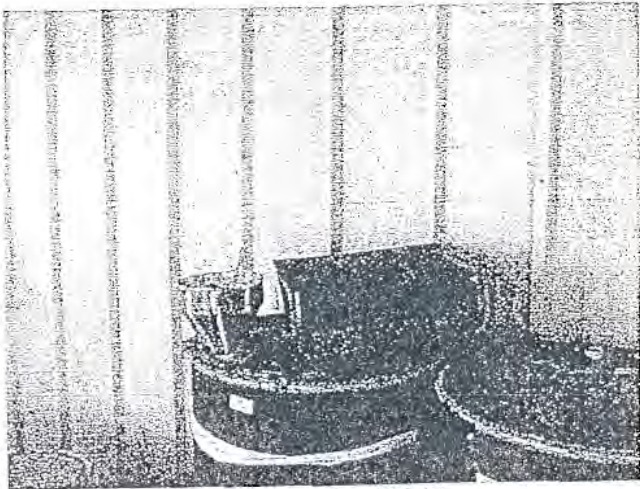
B. When using grounding straps on metal drums maintain the grounding straps are used correctly to ensure proper function. At time of inspection grounding straps on Building 4/5 drum storage areas were not attached correctly.

C. Cleaning solvent cans stacked at Building 5 paint room are stacked too high and are unstable. Maintain proper storage of containers to prevent tip over and possible spillage.

D. Cylinder storage area outside west entry of Building 5: Cylinders were not secured, empty cylinders were stored with full cylinders, and top missing of one cylinder. Maintain all cylinders are properly secured to prevent tip over, that all cylinders are intact, and empty should be stored separated from full cylinder containers.

E. Incompatibles Segregated: A cardboard box containing small paint cans located in Building 4 north paint room area also contained a partially full container of MEKP- 30 (organic peroxide) and an unlabeled jug of liquid.

National RV
 100 South Sinclair
 Perris, Ca. 92571



103 B (h), 103 F(a), 106 (a)



103 B(f)

HAZARDOUS PROPERTIES/DESCRIPTION: SOLVENT/ADHESIVE, EPA 12A
 PHYSICAL STATE: Liquid HAZARDOUS PROPERTIES:
 Flammable, DIBER, RINSCD

GENERATOR INFORMATION: TELEPHONE: (959) 943-5807

NAME: NATIONAL RV
 ADDRESS: 3111 N. PERRIS BLVD.
 CITY: PERRIS STATE: CA 92571

EPA ID #: CAD981993458 EPA WASTE #: 0001 STATE WASTE CODE:

ACCUMULATION START DATE: 10-11-11 STATE MANIFEST DOCUMENT NO:

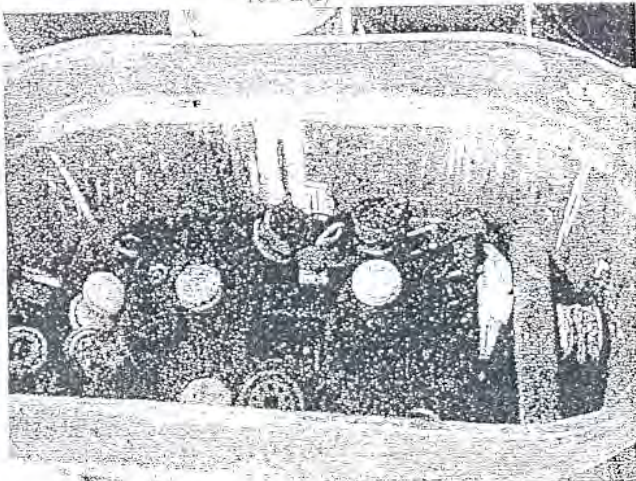
HANDLE WITH CARE!
 CONTAINS HAZARDOUS OR TOXIC WASTES

PRINTED BY: MEDIA LABEL EXPRESS INC. 1010 SAN DIEGO, CA (619) 880-1887 FAX: (619) 880-1887

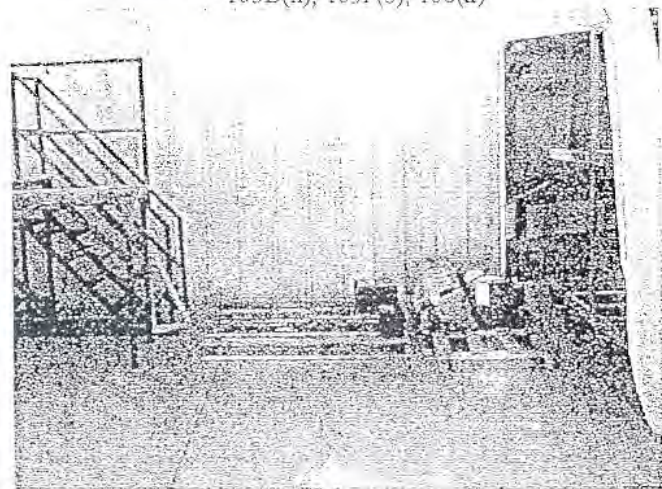
103 B(f)



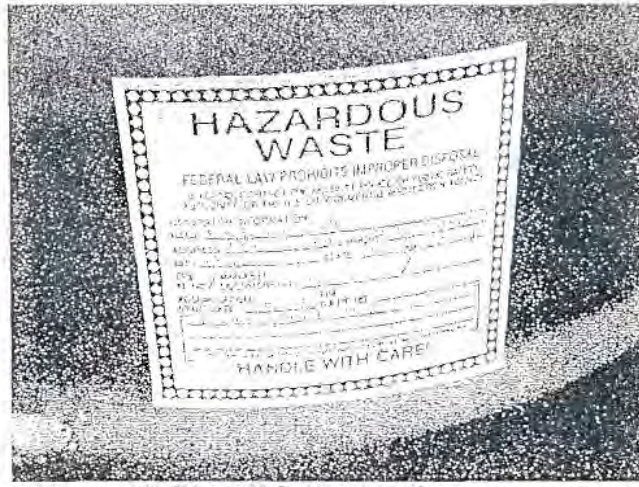
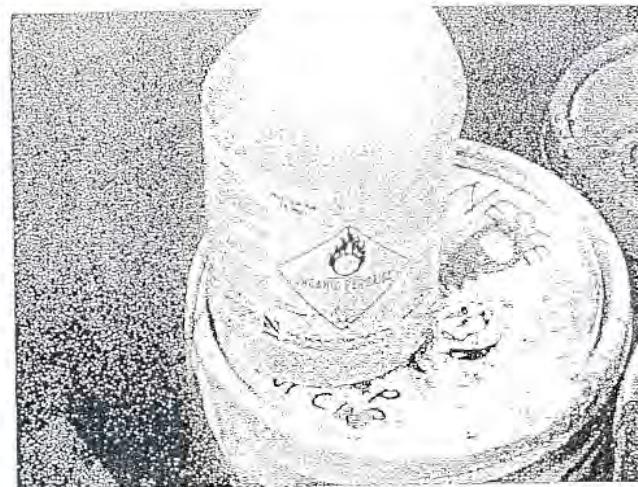
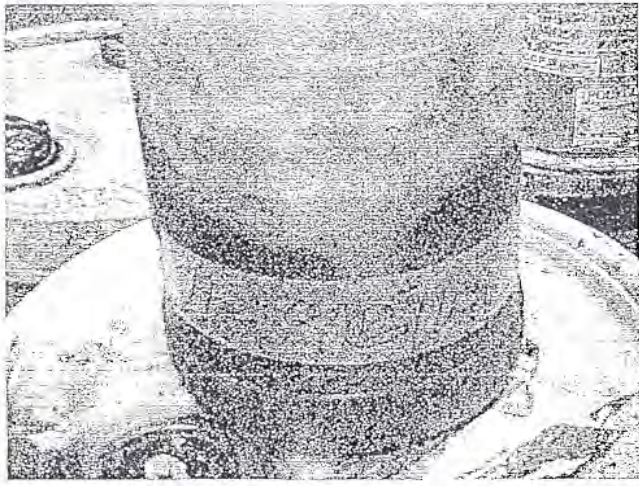
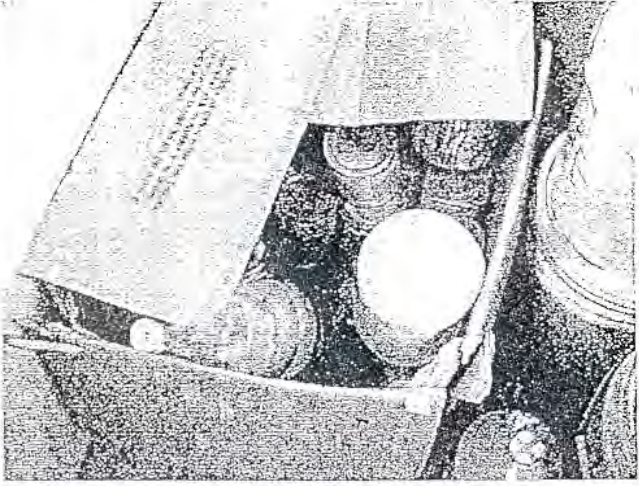
103B(h), 103F(b), 106(a)



103 B(q), 103H(a), 122



103B(r), 123



103 B(a), 103 B (d), 103 B(f)

FEDERAL LAW PROHIBITS IMPROPER DISPOSITION OF HAZARDOUS WASTE. IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME *National R.O.*

ADDRESS *1001 W. ...* PHONE *(813) 486-1111*

CITY *Plant City* STATE *FL* ZIP *33563*

EPA ID. NO. / MANIFEST DOCUMENT NO. *17001 / 134*

ACCUMULATION START DATE *1-16-01* EPA WASTE NO. *17001-134*

DO NOT WRITE SHIPPING NAME AND UN OR NA NO. WITHOUT PERMISSION

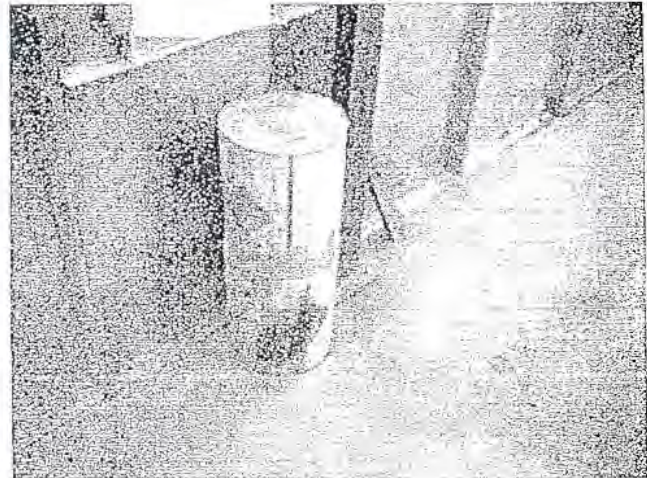
HANDLE WITH CARE!



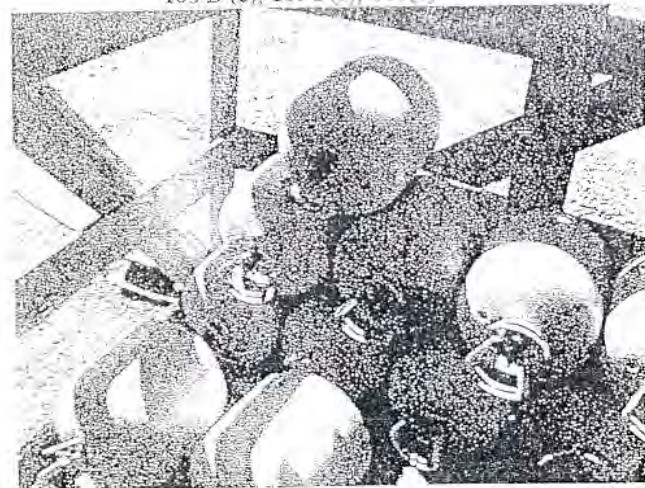
103 B(b)



103 B(a), 103 B(d), 103 B(f)



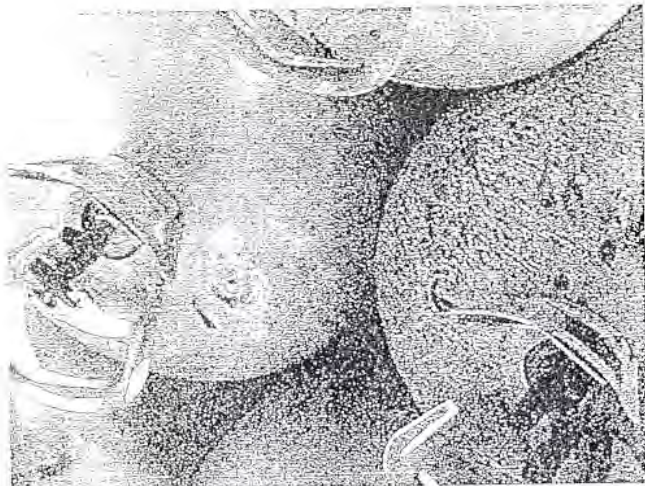
103 B(j)



103 B(p)



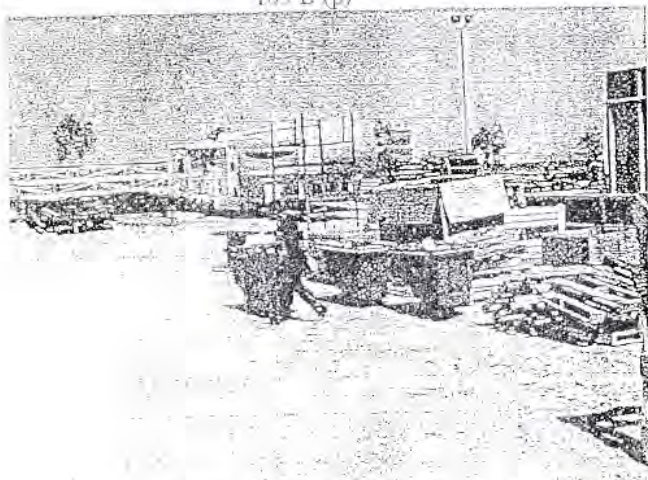
103 B(p)



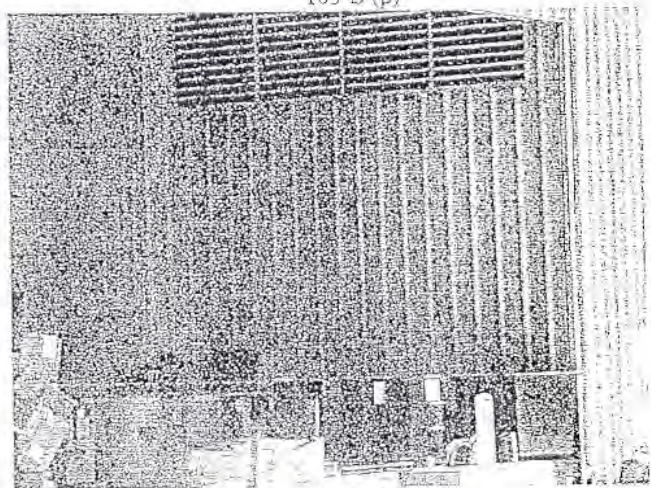
103 B (p)



103 B (p)



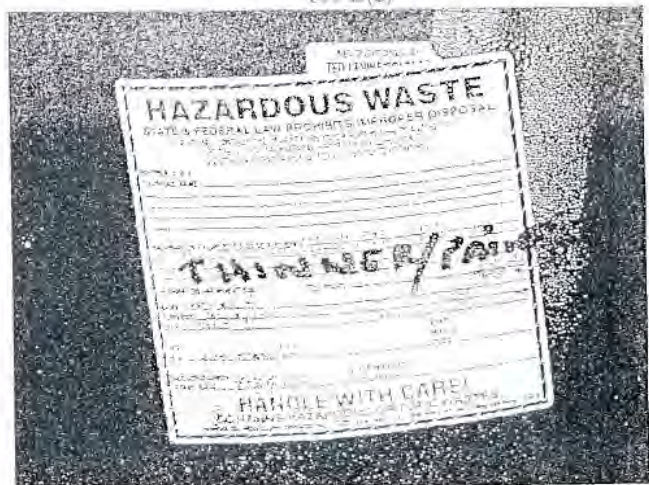
Waste Screening Area



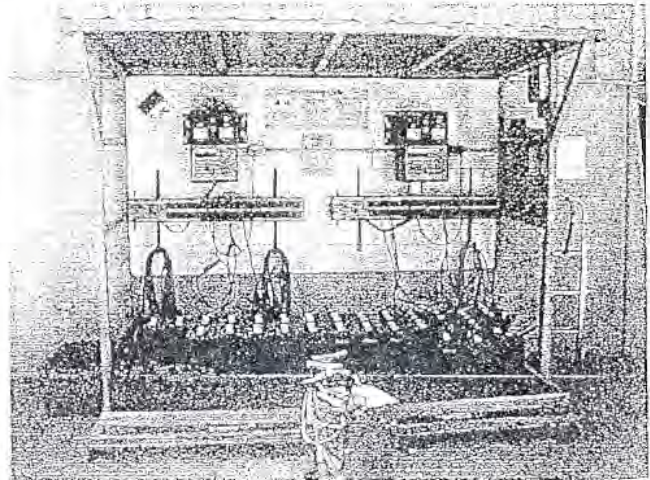
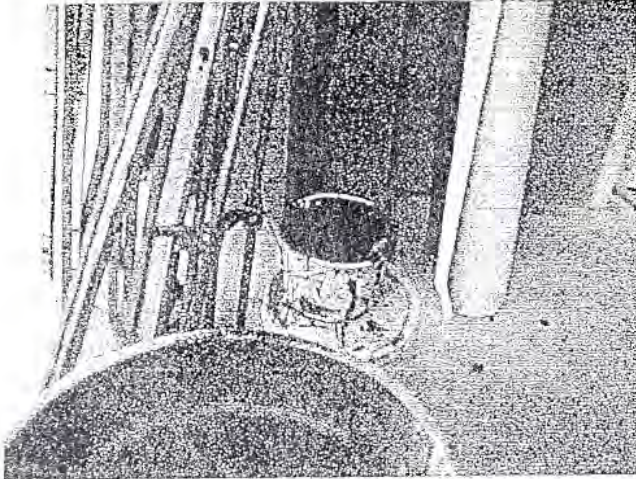
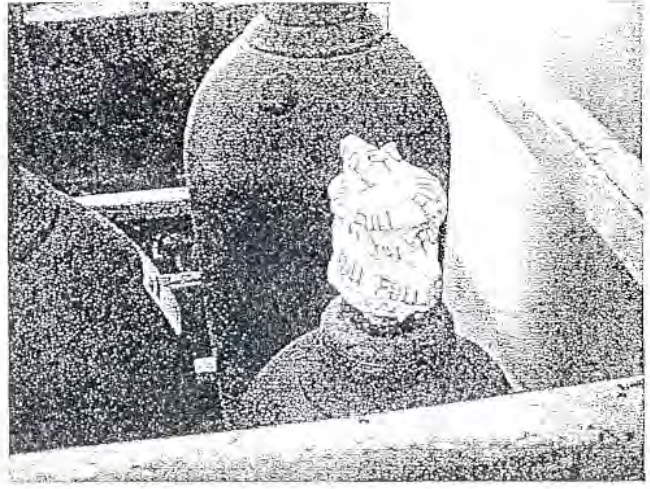
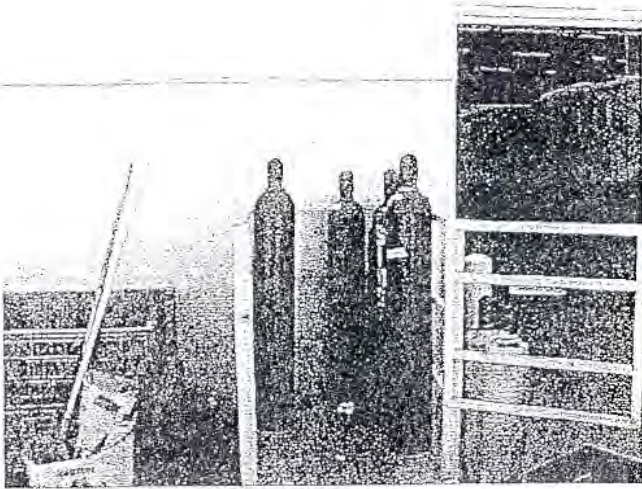
103 B (e)



103 B (d)



103 B (d)



103 B (k), 103 F (e)



Certified Unified Program Agency
County of Riverside Health Services Agency
Department of Environmental Health
Hazardous Materials Management Division
Hazardous Waste Generator Inspection Report

PK

Facility Name	National R.V.	Page 1 of	
Street Address	3411 North Paris Blvd	Date of Inspection	July 29, 02
City	Paris	Zip Code	
Business Contact		Business Phone #	
Health & Safety Code, Chapter 6.5 California Code of Regulations, Title 22 Riverside County Ordinance 615.3		# of Employees	
		Inspection Type	Follow up
		Re-inspection Date	

Hazardous Waste Storage	Y	N	NA	Viol. Type	General Hazardous Waste Requirements	Y	N	NA	Viol. Type
100. Current Permit Ordinance 615.3 Facility ID # 82241	X				107. EPA ID# 22CCR66262.12(a)	X			
101 A. Accumulation Time 22CCR66262.34	X				108 A. Recyclable Hazardous Waste Managed H&SC 25143.2	X			
101 B. Satellite Accumulation Time 22CCR 66262.34(e)			X		108 B. Excluded Recyclable Materials H&SC 25143.2			X	
102 Incompatibles Segregated 22CCR66265.177	X			1 2 m	109. Storage / Treatment Authorized H&SC25201(a)	X			1 2 m
103 Containers					110. Access for Inspection H&SC 25195	X			1 2 m
A. Compatible With Waste 22CCR66265.172	X			1 2 m	111. Hazardous Waste Determination 22CCR66262.11	X			1 2 m
B. Labeled Properly 22CCR66262.34(f)(3)	X				Records Review				
C. Inspected Weekly 22CCR66262.174	X				112. Manifests 22CCR66262.20-23	X			
D. Good Condition 22CCR6626.171	X			1 2 m	113. Biennial and Exception Reports 22CR66262.41	X			
E. Not Leaking 22CCR 66262.173(b)	X			1 2 m	114. Training Documentation Maintained and Available 22CCR66265.16	X			
F. Stored Closed 22CCR66265.173(a)	X			1 2 m	115. Waste Analysis 22CCR66262.40(c)			X	
G. Ignitable or Reactive Hazardous Wastes Stored at Least 50 ft From Property Line 22CCR66265.176			X		116. Hazardous Waste Source Reduction Requirements complete 22CCR67100.3	X			
H. Storage Area Inspected Weekly 22CCR66262.174	X				Transportation and Disposal				
I. Aisle Space 22CCR66264.35	X				117. Registered Transporter 22CCR66262.10	X			1 2 m
104. Aboveground Hazardous Waste Tank Systems					118. Disposed / Treated at an Authorized Location H&SC 25189.5	X			1 2 m
A. Operating Requirements 22CCR 66265.194	X				Management of Used Oil and Batteries				
B. Storage Area Inspected Daily 22CCR 66265.195	X				119. Used Oil Managed Properly H&SC 25250.4			X	
105. Preparedness, Prevention and Contingency Plan Prepared and Completed 22CCR66265.31					120. Used Oil Shipping Records CCR 66266.130(b)(3)			X	
A. Communications and Alarms 22CCR66265.34	X				121. Not Contaminated with Hazardous Waste H&SC25250.7			X	
B. Required Fire, Spill and Decontamination Equipment 22CCR66265.32	X				122. Filters Properly Managed 22CCR66266.130			X	
C. Testing of Fire, Spill and Decontamination Equipment 22CCR66265.33	X				123. Batteries Properly Managed 22CCR66266.81	X			
D. Emergency Response Procedures 22CCR66265.56	X				Other				
E. Arrangements with Local Authorities 22CCR66265.55	X				124. Tiered Permitting (Joint Inspection Required)			X	
F. Evacuation Plan 22CCR66265.52(f)	X				125. SPCC Plan Complete (>660 gallon AGT or >1320 gallons aggregate H&SC25270.5.(c)			X	
G. Emergency Coordinators Listed 22CCR 66265.55	X				126. Contaminated Rags H&SC 25270.5(c)			X	
106. Maintained and Operated to Minimize the Possibility of Fire, Explosion, or Release 22CCR66265.31	X			1 2 m	127. Silver Only Waste H&SC 25143.23			X	
					128. Universal Waste 22CCR66273			X	
					129. NPDES information Provided	X			
					130.				

BOLD violations may be considered CLASS 1 violations and may be subject to legal and enforcement action.

NOTICE OF VIOLATION: The violations noted above must be corrected within _____ days. Failure to comply may result in legal action.

Specialist: <u>Paul Mitchell</u>	Received by: <u>[Signature]</u>	Title: <u>HR MANAGER 7-29-02</u>
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SDM/EM/22/Rev/1/2001
OFFICES:

Riverside
959/358-5055
4065 County Circle Drive
Riverside, CA 92503

Hemet
(809)766-6524
800 South Sanderson Ave.
Hemet, CA 92545-9045

Indio
(760)863-8976
47-923 Oagle St
Indio, CA 92201

Disturbance Write-Up, County/Owner/Operator File Symbols



County of Riverside Health Services Agency
 Department of Environmental Health
 Hazardous Materials Management Division

ENTERED
 10/23/02
 3



Business Emergency Plan Inspection Report

Facility Name: National R-U Date: July 29, 2002
 Address: 3410 KHATH Paris Blvd Inspection: Routine [X] Follow-Up []
 City: Paris Zip Code: _____ Facility #: 82241
 Contact Person: _____ Telephone: _____

Riverside County Ordinance 651

California Code of Regulations TITLE 19

Health & Safety Code Chapter 8.95

Yes | No | N/A | Items marked "No" are violations of the above referenced codes and must be corrected as follows:

Yes	No	N/A	Items marked "No" are violations of the above referenced codes and must be corrected as follows:
			I. Permit
X			A. Current Permit <i>Very good posting of NEPA 704m signs at this facility</i>
			II. Business Emergency Plan
X			A. Approved Plan on Site and Available for Review
X			B. Plan Updated Within Last 2 Years
			III. Chemical Inventory Disclosure
X			A. Chemical Inventory Complete
X			B. Inventory Updated Annually
			IV. Emergency Response Plans and Procedures
X			A. Mitigation, Prevention, Abatement Measures
X			B. Documented Employee Training
X			C. Evacuation Plan with Routes
X			D. Facility Map showing Location of Chemicals
			V. Posting
X			A. Entrance and Exits Posted
X			B. Emergency Phone Numbers Posted
X			C. Hazardous Materials Storage Area Posted
X			D. Emergency Equipment Posted
		X	E. Pesticide Storage Area Posted
			VI. Storage
X			A. Maintained to Minimize Possibility of Release
X			B. Handling Areas Secured
X			C. Incompatibles Stored Separately
X			D. Containers Properly Labeled

The above noted violations shall be corrected within _____ days.

Received by: _____
 Signature: Jeffrey A. Goodnick 7-29-02
 Print Name: Jeffrey A. Goodnick
 Print Title: H.R. MANAGER

Specialist: Paul Mitchell

Riverside Office
 4065 County Circle Drive
 Riverside, CA 92503
 (909) 358-5055

Indio Office
 47923 Oasis Street, Room E4
 Indio, CA 92201
 (619) 863-8976

San Jacinto Office
 1370 S. State Street, Room 101
 San Jacinto, CA 92583
 (909) 654-3878



Certified Unified Program Agency
County of Riverside Health Services Agency
 Department of Environmental Health
 Hazardous Materials Management Division
Hazardous Waste Generator Inspection Report

V

Facility Name: <u>National RV Inc</u>		Page 1 of 1	
Street Address: <u>100 Slinclare Ave</u>		Date of Inspection: <u>June 5, 2001</u>	
City: <u>Perris</u>	Zip Code: _____	# of Employees: _____	
Business Contact: _____		Business Phone #: _____	
Health & Safety Code, Chapter 6.5 California Code of Regulations, Title 22 Riverside County Ordinance 615.3		Inspection Type: <u>Routine</u>	
Re-inspection Date: _____			

Hazardous Waste Storage	Y	N	NA	Viol. Type	General Hazardous Waste Requirements	Y	N	NA	Viol. Type
100. Current Permit Ordinance 615.3 Facility ID # <u>New</u>					107. EPA ID#: <u>22CCR66262.12(a)</u>				X
101 A. Accumulation Time 22CCR66262.34	X				108 A. Recyclable Hazardous Waste Managed H&SC 25143.2	X			
101 B. Satellite Accumulation Time 22CCR 66262.34(e)	X		X		108 B. Excluded Recyclable Materials H&SC 25143.2	X			
102 Incompatibles Segregated 22CCR66265.177	X			1 2 m	109. Storage / Treatment Authorized H&SC25201(a)	X			1 2 m
103 Containers					110. Access for Inspection H&SC 25195	X			1 2 m
A. Compatible With Waste 22CCR66265.172	X			1 2 m	111. Hazardous Waste Determination 22CCR66262.11			X	1 2 m
B. Labeled Properly 22CCR66262.34(f)(3)	X				Records Review				
C. Inspected Weekly 22CCR66262.174	X				112. Manifests 22CCR66262.20-23	X			
D. Good Condition 22CCR66265.171	X			1 2 m	113. Biennial and Exception Reports 22CCR66262.41			X	
E. Not Leaking 22CCR 66262.173(b)	X			1 2 m	114. Training Documentation Maintained and Available 22CCR66265.16	X			
F. Stored Closed 22CCR66265.173(a)	X			1 2 m	115. Waste Analysis 22CCR66262.40(c)			X	
G. Ignitable or Reactive Hazardous Wastes Stored at Least 50 ft From Property Line 22CCR66265.176			X		116. Hazardous Waste Source Reduction Requirements complete 22CCR67100.3			X	
H. Storage Area Inspected Weekly 22CCR66262.174	X				Transportation and Disposal				
I. Aisle Space 22CCR66264.35	X				117. Registered Transporter 22CCR66262.10	X			1 2 m
104 Aboveground Hazardous Waste Tank Systems					118. Disposed / Treated at an Authorized Location H&SC 25189.5	X			1 2 m
A. Operating Requirements 22CCR 66265.194	X				Management of Used Oil and Batteries				
B. Storage Area Inspected Daily 22CCR 66265.195	X				119. Used Oil Managed Properly H&SC 25250.4	X			
105 Preparedness, Prevention and Contingency Plan Prepared and Completed 22CCR66265.31, 32, 33					120. Used Oil Shipping Records CCR 66266.130(b)(3)	X			
A. Communications and Alarms 22CCR66265.34	X				121. Not Contaminated with Hazardous Waste H&SC25250.7	X			
B. Required Fire, Spill and Decontamination Equipment 22CCR66265.32	X				122. Filters Properly Managed 22CCR66266.130	X			
C. Testing of Fire, Spill and Decontamination Equipment 22CCR66265.33	X				123. Batteries Properly Managed 22CCR66266.81			X	
D. Emergency Response Procedures 22CCR66265.56	X				Other				
E. Arrangements with Local Authorities 22CCR66265.55	X				124. Tiered Permitting (Joint Inspection Required)			X	
F. Evacuation Plan 22CCR66265.52(f)	X				125. SPCC Plan Complete (>660 gallon AGT or >1320 gallons aggregate H&SC25270.5(c)			X	
G. Emergency Coordinators Listed 22CCR 66265.55	X				126. Contaminated Rags H & SC 25270.5(c)	X			
106. Maintained and Operated to Minimize the Possibility of Fire, Explosion, or Release 22CCR66265.31	X			1 2 m	127. Silver Only Waste H&SC 25143.23			X	
					128. Universal Waste 22CCR66273			X	
					129. NPDES Information Provided	X			
					130.				

BOLD violations may be considered CLASS 1 violations and may be subject to legal and enforcement action.

NOTICE OF VIOLATION: The violations noted above must be corrected within (30) days. Failure to comply may result in legal action.

Specialist: <u>Paul Mitchell</u>	Received by: <u>Ray Gomez</u>	Title: <u>H.R.</u>
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DEPH-22/Rev/02/00
OFFICES:

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(909)358-5055
8065 County Circle Drive
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Hemet, CA 92343

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47-923 Oasis St.
Indio, CA 92201

Sanborn, White, Cline, Langley, Omer, Omer, Pica, Serrano