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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 16, 1998

TO: De minimis Parties Listed in Attachment "A"

RE: Malvern TCE Superfund Site  
De Minimis Settlement Offer

Dear De Minimis Parties:

This letter constitutes the final de minimis settlement offer issued by the United States Environmental Protection Agency ("EPA") with regard to the Malvern TCE Superfund Site ("Site"). A list of those potentially responsible parties ("PRPs") for the Site that are eligible to participate in this de minimis settlement is enclosed (Attachment "A").

Due to the relatively small amount of hazardous materials that your company contributed to the Site, EPA is offering your company an opportunity to settle as a de minimis party. As a de minimis party, in return for a specified cash payment, EPA will agree not to sue or take any other civil or administrative action against your company with regard to the Malvern TCE Site.

The terms of this final de minimis settlement offer are set forth in the Final Administrative Order on Consent for De Minimis Settlement ("Final Consent Order")(Attachment "B"). Information describing the volume of waste attributed to each PRP and the projected total payment due under the terms of the settlement is set forth in Generator and Broker/Transporter Volumetric Ranking Summaries dated November 30, 1998 ("November 1998 VRS"). The November 1998 VRS are attached to the Final Consent Order as Appendix "C."

I. Settlement Background

This final de minimis settlement offers follows a letter dated April 30, 1998, in which EPA notified PRPs for the Site of the opportunity to participate in a de minimis settlement. With that letter, EPA enclosed a Draft Administrative Order by Consent ("Draft Consent Order") setting forth the terms by which PRPs that are eligible for this de minimis settlement, pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), as amended, 42 U.S.C. § 9601, *et seq.*, could conclude their liability to the United States for response costs incurred or to be incurred at the Site. Also enclosed in EPA's April 30, 1998 letter, were Generator and Broker/Transporter Volumetric Ranking Summaries dated April 27, 1998 ("April 1998 VRS"), which listed the volume of waste attributed to each PRP and projected total payment due under the terms of the settlement embodied in the Draft Consent Order.

Customer Service Hotline: 1-800-438-2474

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Subsequent to the mailing of the Draft Consent Order, EPA met with representatives of a Site De Minimis PRP Group, responded to numerous telephone calls from PRPs or their attorneys, and received and considered comments submitted by a number of PRPs with respect to the proposed settlement in general and specific terms set forth in the Draft Consent Order.

EPA's response to the comments received from these various sources is reflected in the enclosed Final Consent Order, which modifies some important and substantive terms of the Draft Consent Order.

Subsequent to the mailing of its April 30, 1998 letter, EPA also revised the April 1998 VRS in order to reflect changes required as a result of: 1) recently discovered data inputting errors that appeared in the April 1998 VRS<sup>1</sup>; 2) review and/or reconsideration of PRP challenges that had been submitted by PRPs (during the challenge periods provided by EPA) to prior draft volumetric summaries, including the April 1998 VRS; and 3) identification of additional broker/transporter transactions relating to the Site.

## II. Summary of Settlement Offer in this Final Consent Order

### A. Eligibility

The eligibility criteria remain unchanged. Small waste contributors eligible for de minimis settlement have been identified by EPA by utilizing information set forth in the November 1998 Summaries. A PRP is eligible to participate in this settlement if its volumetric contribution of hazardous substance to the Site is at or less than .75% of the total volume attributed to the Main Plant Area ("MPA") of the Site, as set forth in the November 1998 Summaries.<sup>2</sup> Generator PRPs should refer to the "MPA %" column contained in the Generator VRS in order to determine their MPA %. Broker/transporter PRPs should add their MPA % listed on both the Generator VRS and the Broker/Transporter VRS, in order to determine their total MPA %.<sup>3</sup>

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<sup>1</sup> During EPA's review of the April 1998 VRS prior to this mailing, a number of data entry errors were detected and corrected. These corrections led to a decrease in drum counts for a number of PRPs. As a result, most parties listed in the August 1998 VRS will have an increase in volume due to the decrease in total drums transported to the Site.

<sup>2</sup> EPA has established a de micromis cutoff at 1.5 drums or less. At present, EPA does not foresee a need to pursue settlements with de micromis parties. EPA will, however, pursue settlements with de micromis parties if there is a threat of, or an actual suit by, other PRPs at the Site.

<sup>3</sup> Please refer to the documents entitled "Malvern TCE Volumetric Ranking Summaries Overview and Methodology" and "VRS Explanation Sheet" (Attachment "C"), for a

In signing the Final Consent Order, each De Minimis Respondent will certify that the company it represents qualifies for the de minimis settlement eligibility terms (See Final Consent Order, Section X, Certification). Please note that under the terms of the settlement, the United States may void the agreement with respect to any individual party if, among other things, a De Minimis Respondent contributed more than .75% of the total volume attributed to the MPA, or if the certification provided by the De Minimis Respondent is false or materially inaccurate.

Please note that this may be the only de minimis settlement offer that EPA will make in this case. You should be aware that if you do not join in the de minimis settlement, you may continue to be potentially liable to EPA and/or for contribution to other parties at the Site.

**B. Amount of Cash Payment**

The Final Consent Order establishes a total payment each eligible PRP must pay to settle its liability to the United States. This total payment is reflected in the "Total De Minimis Payment" column provided in the November 1998 VRS. The total payment consists of the following costs relating to the Site:

- (1) a payment amount for past costs incurred by EPA;
- (2) a payment for estimated future costs; and
- (3) a premium added to the estimated future costs.

The payment amounts provided in the November 1998 VRS are based on calculations of estimated costs for cleanup of the Site. For purposes of the de minimis settlement, total future response costs are based on estimates set forth in the Record of Decision issued by EPA in November 1997 for the Site.

**C. Installment Payments**

In response to comments received from PRPs to the Draft Consent Order, EPA has included in its cost estimates only remedial, not removal, oversight costs. Remedial oversight costs are estimated to be \$200,000.00. This reduction in oversight costs included in the costs estimates is consistent with the decision by the Third Circuit Court of Appeals in United States v. Rohm and Haas, 2 F.3d 1265 (3d Cir. 1993).

EPA has been asked by PRPs to consider installment payments in order to encourage participation in this de minimis settlement by those parties that are willing to enter into a settlement but would be unable to participate unless given an opportunity to make payments over a longer period of time. In response to these requests, EPA has provided in the Final Consent Order an installment payment option pursuant to which a party may pay its de

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more detailed description of the methodology utilized and information contained in the November 1998 VRS.

minimis settlement payment in two equal installments. The first installment will be due within thirty (30) calendar days of the effective date of the Consent Order, and the balance will be due within one year of the effective date of the Consent Order.

D. Failure to Make Payment

Please note that pursuant to Section IX of the Consent Order, if any De Minimis Respondent fails to make payment within thirty (30) calendar days of the payment becoming due, the Consent Order shall be terminated as to that De Minimis Respondent. Late payments (those paid after the due date but within thirty (30) calendar days of the payment becoming due), shall accrue interest, which shall be assessed to such De Minimis Respondent.

E. Covenant Not to Sue

In return for the cash payment specified in the November 1998 VRS, EPA will provide the Covenant Not to Sue as set forth in Section XI, Paragraph 26, of the Final Consent Order. The settlement also provides protection against contribution actions that could be brought against De Minimis Respondents concerning the Site, to the extent provided in Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(g)(5).

F. Form of the Settlement

This settlement offer is being made only to the addressees of this letter, for a limited period of time. Should you wish to accept this settlement offer, you must do so in accordance with the terms provided in the Final Consent Order. Following the period that you have for joining the settlement, EPA will initiate a thirty (30) day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i). At the completion of the comment period, EPA will execute the agreement, unless it modifies or withdraws its consent pursuant to Sections XVI and XVII of the Consent Order.

G. Required Actions for Participation in this Settlement

(1) Deadline for Submission of Signature Pages

In order to join this settlement, you must execute and submit to EPA a signed signature page to the enclosed Consent Order by January 29, 1999.<sup>4</sup> **DO NOT SEND ANY SETTLEMENT PAYMENT AT THAT TIME.**

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<sup>4</sup> De Minimis PRPs that have raised ability to pay concerns with EPA may defer indicating their acceptance of this offer until after EPA has reviewed and analyzed these parties' financial claims.

(2) Contact Person

Please forward your signature pages to:

Joan A. Johnson (3RC41)  
Assistant Regional Counsel  
United States Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

(3) Deadline for Payment and Mechanics of Payment

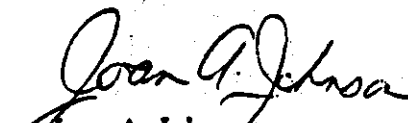
Sometime after January 29, 1999, EPA will notify those parties that have executed and submitted their signature pages in a timely manner of the effective date of the Final Consent Order (refer to Section XIX, Paragraph 40, Effective Date). You will then have thirty (30) days from EPA's issuance of notice of the effective date to make the payment required by the Final Consent Order. Do not send a payment until the EPA notifies you that the Final Consent Order is effective.

If you have any questions about the terms of the Final Consent Order or with respect to information relating to your company as set forth in the November 1998 VRS, please direct your inquiries to:

Joan A. Johnson (3RC41)  
Assistant Regional Counsel  
United States Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Please be advised that this letter is sent for informational purposes only and cannot substitute for a careful review of the Final Consent Order.

Sincerely,

  
Joan A. Johnson  
Assistant Regional Counsel

- Attachment A - List of De Minimis Parties
- Attachment B - Final Administrative Order on Consent for De Minimis Parties
- Attachment C - Volumetric Ranking Summaries Overview and Methodology  
Volumetric Ranking Summaries Challenges and EPA Response
- Attachment D - Comprehensive Mailing List (All Site PRPs)

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III**

**IN THE MATTER OF:**

**Malvern TCE Superfund Site  
258 N. Phoenixville Pike  
Malvern, Pennsylvania**

**U.S. EPA Docket No.  
III-98-074-DC**

**Proceeding under Section 122(g)(4)  
of the Comprehensive Environmental  
Response, Compensation, and  
Liability Act of 1980, as amended,  
42 U.S.C. 9622(g)(4)**

**ADMINISTRATIVE ORDER ON CONSENT  
FOR DE MINIMIS SETTLEMENT**

**AR000065**

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**IN THE MATTER OF:** )  
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Malvern TCE Superfund Site )  
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Proceeding under Section 122(g)(4) )  
of the Comprehensive Environmental )  
Response, Compensation, and )  
Liability Act of 1980, as amended, )  
42 U.S.C. 9622(g)(4) )

U.S. EPA Docket No.  
III-98-074-DC

**ADMINISTRATIVE ORDER  
ON CONSENT FOR DE MINIMIS  
SETTLEMENT**

**I. JURISDICTION**

A. This Administrative Order on Consent ("Consent Order" or "Order") is issued pursuant to the authority vested in the President of the United States by Section 122(g)(4) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9622(g)(4), to reach settlements in actions under Section 106 or 107 of CERCLA, 42 U.S.C. § 9606 or 9607. The authority vested in the President has been delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order 12580, 52 Fed. Reg. 2923 (Jan. 29, 1987), and further delegated to the Regional Administrators of the EPA by EPA Delegation No. 14-14-E (September 13, 1987).

B. This Consent Order is entered into voluntarily by and between EPA and each of the de minimis potentially responsible parties listed in Appendix "A" who have executed the attached signature pages ("De Minimis Respondents" or "Respondents"). Each De Minimis Respondent agrees to undertake all actions required by the terms and conditions of this Order. Each De Minimis Respondent consents to and will not contest EPA's jurisdiction to issue this Order or to implement or enforce its terms.

C. The De Minimis Respondents further agree and submit that the United States District Court for the Eastern District of Pennsylvania has jurisdiction over this Consent Order for the purposes of any subsequent proceedings for implementation or enforcement of this Order because a release or threatened release of hazardous substances has occurred at the Malvern TCE Superfund Site ("Site") in Malvern, Chester County, Pennsylvania, as hereinafter defined, which is located in such judicial district.

D. This Consent Order was agreed to and executed by EPA and the De Minimis Respondents in good faith to avoid the expense and delay of litigation over the matters addressed by this Consent Order.

E. EPA and the De Minimis Respondents agree that this Consent Order is entered into without any admission of liability for any purpose as to any matter arising out of the transactions or occurrences alleged in the Order. The participation of the De Minimis Respondents in this Order shall not be considered an admission of liability and shall not be admissible in evidence against the De Minimis Respondents in any judicial or administrative proceeding other than proceedings to implement or enforce this Order or a judgement relating to it.

## II. STATEMENT OF PURPOSE

1. By entering into this Consent Order, the mutual objectives of the Parties are:
  - a. to reach a final settlement among the Parties with respect to the Site pursuant to Section 122(g) of CERCLA, 42 U.S.C. § 9622(g), that allows the De Minimis Respondents to make a cash payment, including a premium, to resolve their alleged civil liability under Sections 106 and 107 of CERCLA, 42 U.S.C. §§ 9606 and 9607, for injunctive relief with regard to the Site and for response costs incurred and to be incurred at or in connection with the Site, thereby reducing litigation relating to the Site;
  - b. to simplify the remaining enforcement activities concerning the Site by eliminating a substantial number of parties from further involvement in the Site;
  - c. to reimburse the Hazardous Substances Superfund for a portion of the response costs incurred or to be incurred in connection with the Site without waiving the United States' assertion of joint and several liability against parties other than the De Minimis Respondents.

## III. PARTIES BOUND

2. This Consent Order shall apply to and be binding upon EPA, the De Minimis Respondents, and their successors and assigns. Each signatory to this Consent Order represents that he or she is fully authorized to enter into the terms and conditions of this Consent Order and to execute and bind legally the Party represented by him or her. Any change in ownership or corporate status of any De Minimis Respondent, including, but not limited to, any transfer of assets or real or personal property, shall in no way alter such De Minimis Respondent's responsibilities under this Consent Order.

## IV. DEFINITIONS

3. Unless otherwise expressly provided herein, terms used in this Consent Order that are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in the statute or regulations. Whenever the terms listed below are used in this Consent Order, the following definitions shall apply:

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- a. "CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601, *et seq.*
- b. "Consent Order" or "Order" shall mean this Administrative Order on Consent and all appendices attached hereto. In the event of conflict between this Order and any appendix, the Order shall control.
- c. "Day" shall mean a calendar day unless expressly stated to be a working day. "Working day" shall mean a day other than a Saturday, Sunday, or Federal holiday. In computing any period of time under this Consent Order, where the last day would fall on a Saturday, Sunday, or Federal holiday, the period shall run until the close of business of the next working day.
- d. "EPA" shall mean the United States Environmental Protection Agency and any successor departments, agencies or instrumentalities.
- e. "EPA Hazardous Substance Superfund" shall mean the Hazardous Substance Superfund established by the Internal Revenue Code, 26 U.S.C. § 9507.
- f. "Future Response Costs" shall mean all Response Costs, including but not limited to direct and indirect costs, and recoverable costs of oversight of removal or remedial actions, that may be incurred by EPA in connection with the Site, after June 17, 1997, plus interest on all such costs.
- g. "Hazardous Substance" shall have the meaning provided in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
- h. "Interest" shall mean interest at the current rate specified for interest on investments of the EPA Hazardous Substance Superfund established by 26 U.S.C. § 9507, compounded annually on October 1 of each year, in accordance with 42 U.S.C. § 9607(a).
- i. "National Contingency Plan" or "NCP" shall mean the National Oil and Hazardous Substances Pollution Contingency Plan promulgated pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, as set forth at 55 Fed. Reg. 8,666 (March 8, 1990), and codified at 40 C.F.R. Part 300, including any amendments thereto.
- j. "Natural Resources" shall have the meaning provided in Section 101(16) of CERCLA, 42 U.S.C. § 9601(16);
- k. "Paragraph" shall mean a portion of this Consent Order identified by an arabic numeral or an upper case letter.
- l. "Parties" shall mean EPA and the De Minimis Respondents.

m. "Past Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that EPA has paid at or in connection with the Site through June 17, 1997, plus Interest on all such costs which has accrued pursuant to 42 U.S.C. § 9607(a) through such date.

n. "Respondents" or "De Minimis Respondents" shall mean those persons, corporations, or other entities listed in Appendix "A," and successors and assigns of such persons, corporations, or other entities.

o. "Response Costs" shall mean all costs of "response" as that term is defined by Section 101(25) of CERCLA, 42 U.S.C. § 9601(25).

p. "Section" shall mean a portion of this Consent Order identified by a roman numeral.

q. "Site" shall mean the Malvern TCE Superfund Site, including areas defined in 40 C.F.R. § 300.400(e), located at and around 258 N. Phoenixville Pike in Malvern, Chester County, Pennsylvania and depicted more clearly on the map attached as Appendix "B."

r. "United States" shall mean the United States of America, including its departments, agencies and instrumentalities.

s. "Volumetric Ranking Summaries" shall mean the lists prepared by EPA for the Site of each De Minimis Respondent's volumetric share including cost share and premium(s), attached as Appendix "C."

#### **V. EPA'S STATEMENT OF FACTS**

4. The Site is located at and around 258 N. Phoenixville Pike, Malvern, East Whiteland Township, Chester County, Pennsylvania. A Transcontinental Gas Pipeline Co. natural gas pipeline right-of-way extends along the southern boundary of the Site, with residential areas and areas with natural forestation and vegetation bordering the property to the west, north and east. The approximate area of the Site is identified on the map attached as Appendix "B."

5. The Site includes, but is not limited to, a parcel of approximately 5-acres at which Chemcene Corporation ("Chemcene"), from 1952 until 1992, among other things, sold and reclaimed industrial cleaning solvents including trichloroethene ("TCE"), 1,1,1-trichloroethane, perchloroethylene, and methylene chloride. These solvents were used by local industries for degreasing metal parts and other cleaning purposes. Chemcene used a distillation process to remove impurities from the chlorinated solvents. The distilled solvents were then returned to customers for reuse. The end products of processing waste solvents are the reclaimed solvents and chlorinated still bottoms. The chlorinated waste solvents are listed hazardous wastes pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 et seq.

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and, therefore, the resulting still bottoms are listed hazardous waste. Wastes shipped to Chemclene were stored, processed, disposed, and bulk accumulated at the Site for eventual transfer to other locations, and a small amount was directly transshipped to other locations.

6. Chemclene utilized two areas of the Site, the Main Plant Area ("MPA") and the Former Disposal Area ("FDA"), as part of its business operations. Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including hazardous substances. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations. Chemclene disposed of wastes, including hazardous substances, at the FDA. Chemclene claims that disposal at the FDA ceased when new management took over the business in approximately August 1975.

7. In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Chemclene facility. Private domestic wells and on-Site monitoring wells were sampled by Pennsylvania's Department of Environmental Resources and Chemclene in June 1980 and July 1981. Analytical results of this sampling revealed contamination of the underlying aquifer with chlorinated ethenes and related compounds.

8. Pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, EPA proposed the Site for listing on the National Priorities List ("NPL"), set forth at 40 C.F.R. Part 300, Appendix "B," by publication in the Federal Register. Final listing on the NPL as the Malvern TCE Superfund Site was in September 1983.

9. Hazardous substances have been or are threatened to be released at or from the Site, including, but not limited to, at or from the MPA and FDA at the Site.

10. Between 1981 and 1986, Chemclene commenced certain activities, including installation of filters on contaminated home wells located within a residential development south of the Chemclene property, FDA debris and drum removal and limited soil excavation, and removal of underground storage tanks and soil sampling at the MPA, to address EPA concerns of contamination at the Site. In 1987, Chemclene entered into a Corrective Action Order pursuant to RCRA (Docket No. RCRA-III-010-CA) with EPA. Chemclene did not complete a RCRA Facilities Investigation of the Site or implement corrective measures at the Site, as required by the RCRA Order.

11. As a result of the release or threatened release of hazardous substances, EPA has undertaken response actions at or in connection with the Site under Section 104 of CERCLA, 42 U.S.C. § 9604, and will undertake response actions in the future. Among other things, EPA:

a. assumed control of maintenance activities of filter units that had been installed on contaminated residential wells located south of the Site and of periodic sampling of residential wells;

- b. upgraded residential well filter systems in response to analytical results from well samples that showed contamination was passing through the existing filters into the homes;
- c. conducted and completed in January 1997 a Remedial Investigation of the Site;
- d. completed a Feasibility Study of the Site in June 1997; and
- e. issued a Record of Decision in November 1997 pursuant to which EPA selected a remedy to be implemented at the Site.

12. In performing these response actions, EPA has incurred and will continue to incur response costs. As of June 17, 1997, EPA had incurred \$2,214,705.00 in Past Response Costs, excluding prejudgment interest, which still remains unreimbursed. EPA will incur Future Response Costs at the Site.

13. EPA has reviewed records describing the transactions of the Potentially Responsible Parties ("PRPs"), including the De Minimis Respondents, in relation to the Site. These records include information describing the amount and nature of waste contributed to the Site. Based upon that review, EPA has determined that each De Minimis Respondent listed in Appendix "A" arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, of a hazardous substance owned or possessed by such De Minimis Respondent, at the Site, or accepted a hazardous substance for transport to the Site.

14. Information currently known to EPA indicates that each De Minimis Respondent listed in Appendix "A" contributed between 1.6 drums and 0.75% of the total waste sent to the Site, and that the toxic or other hazardous effects of the hazardous substances contributed by each De Minimis Respondent to the Site are not significantly more toxic than the other hazardous substances at the Site. The Volumetric Ranking Summaries ("VRS") (Appendix "C") prepared for the Site list, among other things, the estimated volume of waste contributed to the Site by each De Minimis Respondent and the percentage of waste contributed to the Site by each Respondent in relation to the total estimated volume of waste sent to the Site during the 1968 to 1992 time period. The volumes and percentage shares presented in the VRS represent EPA's best estimates and are based on all information currently in EPA's possession.

15. EPA estimates that the total response costs incurred and to be incurred at or in connection with the Site by the EPA Hazardous Substance Superfund and by private parties is \$18,143,856.00. This amount includes \$2,214,705.00 in response costs incurred by EPA through June 17, 1997, and Future Response Costs in the amount of \$15,729,151.00 (estimated future Site remedial costs in the amount of \$15,529,151.00, and EPA future remedial oversight costs estimated to be \$200,000.00). The payment required to be made by each De Minimis Respondent pursuant to this Consent Order is a minor portion of this total amount.

16. EPA has identified PRPs other than De Minimis Respondents who owned or operated the Site, or who arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, at the Site, of a hazardous substance owned or possessed by such persons.

## VI. DETERMINATIONS

17. Based upon the Statement of Facts set forth above and on the administrative record for this Site, EPA has determined that:

- a. the Site is a "facility" as that term is defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).
- b. each De Minimis Respondent is a "person" as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).
- c. each De Minimis Respondent is liable within the meaning of Sections 107(a) and 122(g)(1) of CERCLA, 42 U.S.C. §§ 9607(a) and 9622(g)(1).
- d. the materials shipped to the Site by the De Minimis Respondents include "hazardous substances" within the meaning of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
- e. the past, present or future migration of hazardous substances from the Site constitutes an actual or threatened "release" as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).
- f. the Past Response Costs incurred and Future Response Costs to be incurred in connection with the Site are removal and remedial response costs within the meaning of Section 107(a) of CERCLA, 42 U.S.C. § 9607(a).
- g. prompt settlement with each De Minimis Respondent is practicable and in the public interest within the meaning of Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1).
- h. as to each De Minimis Respondent, this Consent Order involves only a minor portion of the response costs at the Site within the meaning of Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1).
- i. each Respondent is eligible for a de minimis settlement pursuant to Section 122(g)(1)(A) of CERCLA, 42 U.S.C. § 9622(g)(1)(A), since both the amount and the toxicity or other hazardous effects of the hazardous substances contributed to the Site by each De Minimis Respondent is minimal in comparison to other hazardous substances at the Site.

## VII. ORDER

18. Based on the foregoing Statement of Facts and Determinations by EPA, in order to reach an expedited de minimis settlement in connection with the Site, in consideration of, and in exchange for, the promises, mutual undertakings, and covenants set forth herein, and intending to be legally bound hereby, EPA and the De Minimis Respondents agree, and EPA hereby Orders, that the De Minimis Respondents shall pay their cost share as set forth below:

a. Within thirty (30) days of the effective date of this Order, each De Minimis Respondent shall pay its volumetric share of the cost basis of \$18,143,856.00 (\$2,214,705.00 in Past Response Costs; and \$15,729,151.00 in Future Response Costs, which include EPA future remedial oversight costs in the amount of \$200,000.00). The amount to be paid by each settling De Minimis Respondent is set forth under the Total Payment Column included in the Volumetric Ranking Summaries, attached as Appendix "C."

b. The de minimis settlement payment required of each De Minimis Respondent, as referred to in Paragraph 18.a. of this Order, includes a settlement premium equal to 50% of the De Minimis Respondent's volumetric share of \$15,729,151.00 (total estimated Future Response Costs). The premium shall cover the risk of cost overruns or that conditions at the Site previously unknown to EPA are discovered after the effective date of this Consent Order, or information previously unknown to EPA is received, in whole or in part, after the effective date of this Consent Order, and these previously unknown conditions or this information indicates that the remedial action is not protective of human health and the environment.

## VIII. PAYMENT

19. Payments by De Minimis Respondents shall be made as follows:

a. Within thirty (30) days of the effective date of this Consent Order, each De Minimis Respondent shall pay the amount listed for the De Minimis Respondent in the Volumetric Ranking Summaries in Appendix "C" to this Consent Order and as specified in Section VII (Order), above.

b. Any De Minimis Respondent may make payment in two equal installments, the first due and payable within thirty (30) days of the effective date of this Consent Order, and the second due and payable within one year of the effective date of the Consent Order.

c. Each payment shall be made by certified or cashier's check made payable to "EPA Hazardous Substance Superfund." Each check shall reference the name and address of the party making payment, the Site name, the EPA Region and Site Spill ID Number 03-91, and the EPA Docket Number for this action, and shall be sent to:

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EPA Superfund  
 U.S. EPA/Region III  
 Attention: Superfund Accounting  
 P.O. Box 360515  
 Pittsburgh, PA 15251-6515

d. At the time of payment, each De Minimis Respondent shall send notice that such payment has been made to:

Linda Dietz (3HS21)  
 Remedial Project Manager  
 United States Environmental Protection Agency  
 Region III  
 1650 Arch Street  
 Philadelphia, PA 19103-2029

20. EPA shall deposit any de minimis settlement proceeds received into a Malvern TCE Superfund Site special account within the EPA Hazardous Substance Superfund. The proceeds can be retained and used by EPA, or by a party designated by EPA, to conduct or finance response action at or in connection with the Site and/or, at EPA's discretion, can be transferred to the EPA Hazardous Substance Superfund as reimbursement for response costs incurred at or in connection with the Site by the EPA Hazardous Substance Superfund. Any amounts remaining in a Malvern TCE Superfund Site special account shall be transferred by EPA to the EPA Hazardous Substance Superfund.

21. Any amounts due and owing by a De Minimis Respondent pursuant to the terms of this Consent Order but not paid in accordance with the terms of this Consent Order shall accrue Interest, as defined in Paragraph 3.h. of this Consent Order, which shall be assessed to such De Minimis Respondent.

#### **IX. FAILURE TO MAKE PAYMENT**

22. If any De Minimis Respondent fails to make any payment under the terms of this Consent Order within thirty (30) days of the payment becoming due, this Consent Order shall be terminated and the Covenant Not to Sue set forth in Section XI, Paragraph 26, shall become null and void as to that De Minimis Respondent.

23. Nothing in this Consent Order shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of a Respondent's violation of this Order or of the statutes and regulations upon which it is based, including, but not limited to, penalties pursuant to Section 122(f) of CERCLA, 42 U.S.C. § 9622(f).

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## X. CERTIFICATION OF RESPONDENTS

24. By signing this Consent Order, each De Minimis Respondent certifies, individually, that, to the best of its knowledge and belief, it has:

a. conducted a thorough, comprehensive, good faith search for documents, and that to the best of its knowledge and belief, such De Minimis Respondent has no information which would result in a material change of the information set forth in the VRS. For purposes of this provision, a material change of the information set forth in the VRS would occur if any PRP's Main Plant Area Percentage or Former Disposal Area Percentage listed in the VRS changes by more than ten percent (10%). A material change of the information set forth in the VRS also would include any information that results in an increase in the MPA% for any PRP identified in the VRS to greater than 0.75%;

b. not altered, mutilated, discarded, destroyed or otherwise disposed of any records, documents, or other information relating to its potential liability regarding the Site after notification of potential liability or the filing of a suit against it regarding the Site; and

c. fully complied with any and all EPA requests for information regarding the Site pursuant to Sections 104(e) and 122(e) of CERCLA, 42 U.S.C. §§ 9604(e) and 9622(e) and Section 3007 of RCRA, 42 U.S.C. § 6927.

25. If this certification is subsequently determined to be false, such De Minimis Respondent shall forfeit all payments made pursuant to Section VIII of this Consent Order. Such forfeiture shall not constitute liquidated damages and shall not in any way foreclose the United States' right to pursue any other causes of action arising from such De Minimis Respondent's false certification. Providing false, fictitious, or fraudulent statements or representations to the United States is punishable as a crime under 18 U.S.C. § 1001.

## XI. COVENANT NOT TO SUE BY UNITED STATES

26. In consideration of the payments that will be made by the De Minimis Respondents under the terms of this Consent Order, and except as specifically provided in Section XII (Reservations of Rights by United States), the United States covenants not to sue or take administrative action against any of the De Minimis Respondents for civil liability for reimbursement of Response Costs or for injunctive relief pursuant to Sections 106 or 107 of CERCLA, 42 U.S.C. §§ 9606 or 9607, or for injunctive relief pursuant to Section 7003 of the RCRA, 42 U.S.C. § 6973, with regard to the Site. With respect to present and future liability, this covenant not to sue shall take effect for each De Minimis Respondent upon receipt of that De Minimis Respondent's payment as required by Section VIII. With respect to each De Minimis Respondent, individually, these covenants are conditioned upon complete performance by such De Minimis Respondent of all

obligations under this Consent Order, and the veracity and completeness of the information provided to EPA by such De Minimis Respondent relating to each De Minimis Respondent's involvement with the Site. These covenants shall be null and void with respect to any individual De Minimis Respondent that fails to perform all obligations under this Consent Order in a timely and complete manner, or has provided materially false, incomplete, or incorrect information in such De Minimis Respondent's Certification under Section X of this Consent Order. These covenants extend only to De Minimis Respondents and do not extend to any other person.

## **XII. RESERVATIONS OF RIGHTS BY UNITED STATES**

27. The United States expressly reserves, and nothing in this Consent Order is intended to be nor shall it be construed as a release or covenant not to sue for, any claim or cause of action, administrative or judicial, civil or criminal, past or future, at law or in equity, which the United States, including EPA, may have against any of the De Minimis Respondents for:

- a. any liability as a result of failure to make the payments required by Section VIII (Payment by De Minimis Respondents), or otherwise comply with the terms of this Consent Order;
- b. liability arising from the past, present, or future disposal, release or threat of release of hazardous substances at any facility, as defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), other than the Site;
- c. any matters not expressly included in Section XI above (Covenant Not to Sue by the United States);
- d. liability for damages for injury to, destruction of or loss of natural resources, and for the costs of any natural resource damage assessments;
- e. liability for response costs relating to the Site that have been or may be incurred by Natural Resource trustees, including, but not limited to, the Department of Interior, of the United States.
- f. criminal liability; or
- g. liability of any De Minimis Respondent for violations of federal or state law.

28. Nothing in this Consent Order constitutes a covenant not to sue or to take action or otherwise limits the ability of the United States to seek or obtain further relief from any De Minimis Respondent, and the covenant not to sue set forth above and the contribution protection provided below will become null and void as to any individual De Minimis Respondent, if:

- a. such De Minimis Respondent contributed more than 0.75% of the total volume of the hazardous substances at the Site or contributed to the Site hazardous substances which contributed disproportionately to the cumulative toxic or other hazardous effects of the hazardous substances at the Site;
- b. such De Minimis Respondent fails to make any payment under the terms of this Consent Order; and/or
- c. such De Minimis Respondent's certification in Section X of this Order is false or materially inaccurate.

### **XIII. COVENANT NOT TO SUE BY RESPONDENTS**

29. De Minimis Respondents covenant not to sue and agree not to assert any claims or causes of action against the United States or its contractors or employees with respect to the Site or this Consent Order including, but not limited to:

- a. any direct or indirect claim for reimbursement from the EPA Hazardous Substance Superfund based on Sections 106(b)(2), 107, 111, 112, or 113 of CERCLA, 42 U.S.C. §§ 9606(b)(2), 9607, 9611, 9612, or 9613, or any other provision of law;
- b. any claims arising out of response activities at the Site; and
- c. any claim against the United States pursuant to Sections 107 and 113 of CERCLA, 42 U.S.C. §§ 9607 and 9613, relating to the Site.

30. Nothing in this Consent Order shall be deemed to constitute preauthorization or approval of a claim within the meaning of Section 111 of CERCLA, 42 U.S.C. § 9611, or 40 C.F.R. § 300.700(d).

### **XIV. EFFECT OF SETTLEMENT/CONTRIBUTION PROTECTION**

31. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a party to this Consent Order. The preceding sentence shall not be construed to waive or nullify any rights that any person not a signatory to this Consent Order may have under applicable law. The United States and the De Minimis Respondents each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims, demands, and causes of action which each party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a party hereto.

32. EPA and the De Minimis Respondents agree that the actions undertaken by De Minimis Respondents in accordance with this Consent Order do not constitute an admission of any liability by any De Minimis Respondent. The De Minimis Respondents do not admit, and retain

the right to controvert in any subsequent proceedings, other than proceedings brought by the United States to implement or enforce this Consent Order, the validity of the Statement of Facts or Determinations contained in this Consent Order.

33. The De Minimis Respondents agree that with respect to any suit or claim for contribution brought by them for matters related to this Consent Order they will provide notification to EPA in writing no later than sixty (60) days prior to the initiation of such suit or claim. The De Minimis Respondents also agree that with respect to any suit or claim for contribution brought against them for matters related to this Consent Order they will provide notification to EPA in writing within ten (10) days of service of the complaint on them. In addition, De Minimis Respondents shall notify EPA within ten (10) days of receipt of any order from a court setting any such case for trial.

34. In any subsequent administrative or judicial proceeding initiated by the United States for injunctive relief, recovery of response costs, or other appropriate relief relating to the Site, De Minimis Respondents shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, res judicata, collateral estoppel, issue preclusion, claim-splitting, or other defenses based upon any contention that the claims raised by the United States in the subsequent proceeding were or should have been brought in the instant case; provided, however, that nothing in this Paragraph affects the enforceability of the covenants not to sue set forth in Section XI (Covenants Not to Sue by the United States).

35. Subject to the Reservation of Rights in Section XII of this Order, each De Minimis Respondent, by entering into and complying with the terms of this Consent Order, is entitled to protection from contribution actions or claims as provided by Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(g)(5), for "matters addressed" in this Consent Order. The "matters addressed" in this Consent Order are all response actions taken by the United States and by private parties, and all response costs incurred and to be incurred by the United States, including Past Response Costs and Future Response Costs, as such terms are defined in Paragraphs 3(f) and 3(m) of this Consent Order, and by private parties, at or in connection with the Site. The "matters addressed" in this settlement do not include those response costs or response actions as to which the United States has reserved its rights under this Consent Order (except for claims for failure to comply with this Consent Order), in the event that the United States asserts rights against De Minimis Respondents coming within the scope of such reservations.

#### **XV. OPPORTUNITY FOR PUBLIC COMMENT**

36. This Consent Order shall be subject to a thirty-day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i), and Section 7003(d) of RCRA, 42 U.S.C. § 6973(d). EPA shall provide notice, and an opportunity for a public meeting in the affected area on the proposed settlement in accordance with Section 7003(d) of RCRA, 42 U.S.C. § 6973 (d).

In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. § 9622(i)(3), EPA may withdraw or withhold its consent to this Consent Order if comments received disclose facts or considerations which indicate that this Consent Order is inappropriate, improper or inadequate.

#### **XVI. ATTORNEY GENERAL APPROVAL**

37. In accordance with Section 122(g)(4) of CERCLA, this Consent Order shall not become effective without the prior written approval of the Attorney General or her designee.

#### **XVII. COSTS AND FEES**

38. De Minimis Respondents shall bear their own costs and attorney's fees regarding this matter. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a Party to this Consent Order. The United States and De Minimis Respondents each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims, demands, and causes of action which each Party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a Party hereto.

#### **XVIII. INTEGRATION/APPENDICES**

39. This Consent Order and its appendices constitute the final, complete and exclusive agreement and understanding among the Parties with respect to the settlement embodied in this Consent Order. The Parties acknowledge that there are no representations, agreements or understandings relating to the settlement other than those expressly contained in this Consent Order. The following appendices are attached to and incorporated into this Consent Order:

"Appendix A" – List of De Minimis Respondents

"Appendix B" – Map of the Site.

"Appendix C" – Volumetric Ranking Summaries (Showing Volumes and Payment Amounts)

#### **XIX. EFFECTIVE DATE**

40. The effective date of this Consent Order shall be the date upon which EPA issues written notice to De Minimis Respondents that the public comment period pursuant to Paragraph 36 has closed and that comments received, if any, do not require modification of or EPA withdrawal from this Consent Order.

IT IS SO AGREED AND ORDERED:

U.S. Environmental Protection Agency:

By: *W. Michael McCabe*  
W. Michael McCabe  
Regional Administrator, Region III

MAY 21 1999

Date

THE UNDERSIGNED RESPONDENT enters into this Consent Order in the matter of [insert U.S. EPA docket number], relating to the Malvern TCE Superfund Site, 258 N. Phoenixville Pike, Malvern, Pennsylvania.

FOR RESPONDENT: \_\_\_\_\_  
[Name]

\_\_\_\_\_  
[Address]

By: \_\_\_\_\_ [Signature] \_\_\_\_\_ [Date]

\_\_\_\_\_  
[Type name and Title]

**De Minimis Respondent opts to pay in two equal installments, as provided for in Paragraph 19 of this Consent Order:**

Yes

No



ATTACHMENT 1

Settling De Minimis Parties - Malvern TCE Superfund Site  
Docket No. CERC-III-98-074-DC

1. A&L Handles
2. A. Johnson & Company Incorporated
3. Accumetrics
4. Acro Labels
5. Adelpia Graphic Systems (AGS)
6. Airworks
7. Alfa Laval Separation Incorporated
8. Amchem
9. AMF Incorporated
10. AMP Corporation
11. Amuneal Manufacturing Company
12. Anchor Darling Company
13. Angelo
14. Asplundh Manufacturing Company
15. B.P. Oil
16. Beemer Engineering
17. Bendtru Company
18. Berg Laboratories
19. Biddle Instruments Company
20. Bilgram Gear Company
21. Boeing
22. Boyertown Packing Company
23. Brandt Corporation
24. Brooks Instrument
25. Brumbaugh Industries
26. Bunnell Plastics Incorporated
27. Cantol Incorporated
28. Chem-Par
29. Chobert Associates
30. Chrono-Log Corporation
31. Classic Couchworks
31. Clifton Precision
33. Coatings for Industry Incorporated
34. Cobra Wire & Cable Company
35. Concurrent Computer Corporation
36. Container Research Corporation
37. Controls Service & Engineering
38. Cook Specialty Company

Attachment I  
Settling De Minimis Parties  
Malvern TCE Superfund Site

39. Crown Marketing Equipment Company
40. CW Industries
41. Danco Tool & Mold Company
42. Data Media Incorporated
43. De Vilbiss, Inc.
44. Decision Data
45. Delmaco Manufacturing Incorporated
46. Deltron Incorporated
47. Dentronix Incorporated
48. Dettra Flag Company
49. Diversified Electronic Corporation
50. Dixon Industries Corporation
51. Drexelbrook Engineering
52. E/M Corporation
53. East West Label Company Incorporated
54. Eaton
55. Electro Platers of York Incorporated
56. Ellisco
57. Empire Abrasives
58. EMR Photoelectric
59. Far East Foods
60. Fluid Power Incorporated
61. Formation Incorporated
62. Formosa Plastics Corporation Delaware
63. Franklin Mint
64. Gala Industries
65. Gas Springs
66. Gateway Terminal
67. General Electric
68. Giles & Ransome
69. Gould Incorporated
70. Graphic Packaging Corporation
71. Green Tweed Company
72. H-V Industries Incorporated
73. Hale Pumps Incorporated
74. Heel Company
75. Herman Golden Company Incorporated
76. Hollingsworth

Attachment I  
Settling De Minimis Parties  
Malvern TCE Superfund Site

77. Honeywell Instruments
78. Hurst Performance
79. Imperial Speciality
80. Iron Bound Heat Treating Company
81. James Spring & Wire Company
82. Jetshapes Incorporated
83. John Evans & Sons Incorporated
84. Johnson Mathey
85. Kawneer Corporation
86. Krautkramer-Branson Incorporated
87. KSM Fastening Systems Incorporated
88. Kulicke & Soffa
89. L&S Tool & Machine Company
90. Laminators Incorporated
91. Lincoln
92. London Harness & Cable Company
93. Mars Electronics Incorporated
94. Materials Electronic Products
95. Matthews International
96. McGee Industries
97. Meade Packaging
98. Met-Fin
99. MQS Inpection Incorporated/Magnaflux
100. Napp Chemical
101. Netzsch Incorporated
102. Neutronics
103. NGK Metals
104. Norco Finishing
105. North Industrial Chemicals
106. North Penn Polishing & Plating
107. Olympic Tool & Machine Company
108. Paris Business Forms
109. Penguin Industries
110. Penn Dye & Finishing
111. Pennwalt Corporation
112. Pepco Manufacturing Company
113. Peripheral Dynamics
114. Permutit
115. Peter Paul Cadbury Company

Attachment 1  
Settling De Minimis Parties  
Malvern TCE Superfund Site

116. Petter Engraving Incorporated
117. Phila. Electric Co. Oregon Maint. Shop
118. Philadelphia Rust Proof Company Inc.
119. Phillips & Jacobs
120. PHL Incorporated
121. Photolastic Incorporated
122. Pitman Corporation
123. Plate Crafters Incorporated
124. PQ Corporation
125. Pyco Incorporated
126. R.R. Donnelley & Sons Incorporated
127. RDL Incorporated
128. Reynolds Cleaners
129. Reynolds Metals
130. Sandvik Incorporated
131. Scott Paper Corporation
132. SGL
133. Shared Medical Systems (SMS)
134. Sharples Incorporated
135. Sikkens Company
136. Silvine
137. Simco Company Incorporated
138. SKF Industries Incorporated
139. Solar Atmospheres
140. Sonic Instruments
141. SPD Technologies
142. Sperry Univac
143. Spra-Fin Incorporated
144. Sprague Griffiths Division
145. SPS Technologies
146. Stein Seal Company
147. Sterling Fleishman Company
148. Superior Metal Products
149. Superior Tube
150. Sweda/Litton
151. Synthane Taylor Corporation
152. Techalloy Incorporated
153. Technical Products
154. Telegenix Incorporated

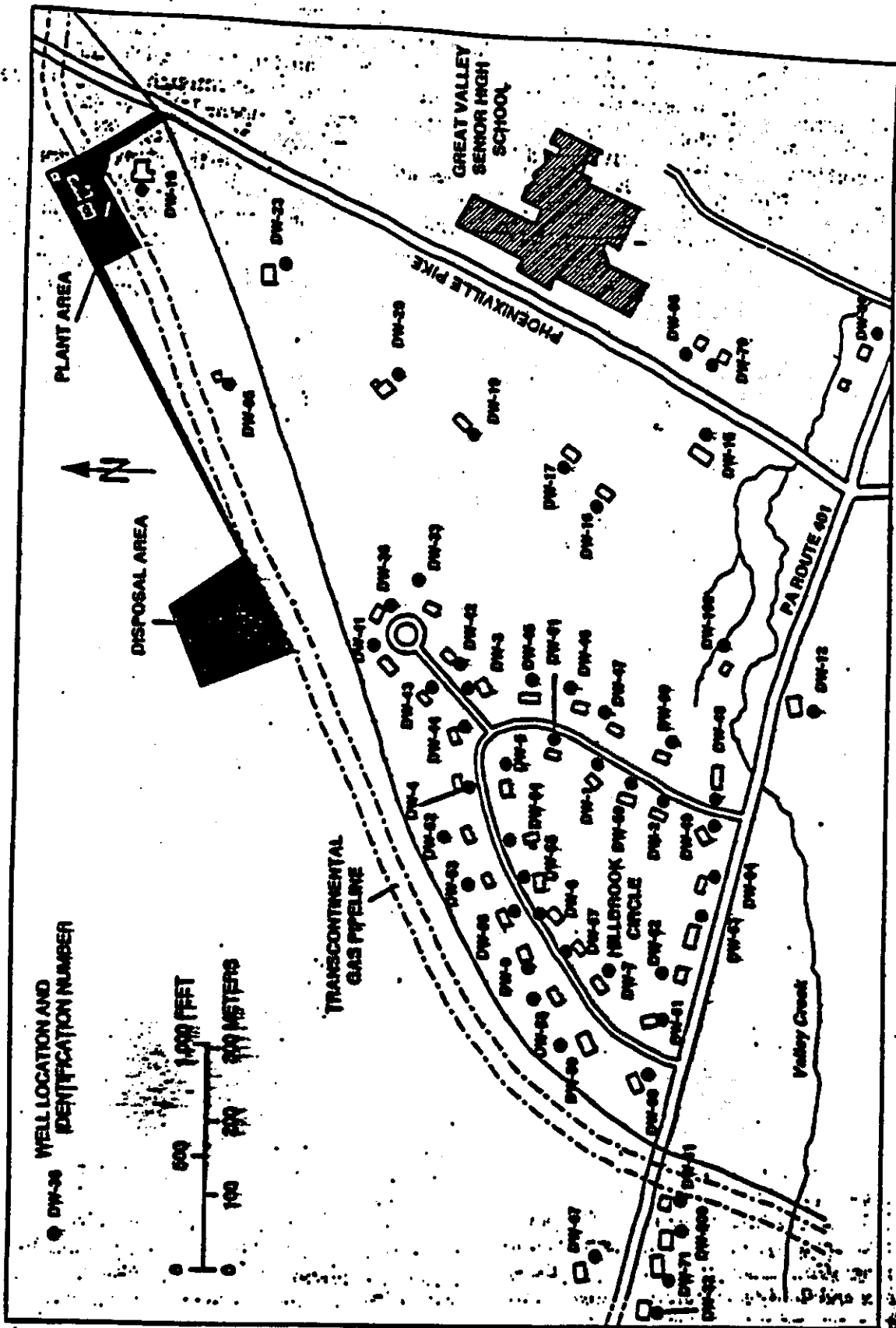
**Attachment 1  
Settling De Minimis Parties  
Malvern TCE Superfund Site**

- 155. Thermoseal Glass Corporation**
- 156. Transducer Systems Incorporated**
- 157. Trend Instruments Incorporated**
- 158. Troemner, Henry**
- 159. United Contamination Controls Incorporated**
- 160. Valley Forge Laboratories Incorporated**
- 161. Valley Forge Tape & Label Company**
- 162. Victaulic Company of America**
- 163. Waste Conversion**
- 164. Welex Incorporated**
- 165. Westcode Incorporated**
- 166. Westinghouse**
- 167. Woodstream Corporation**
- 168. Yuasa-Exide Battery Corporation**
- 169. Zenith Products**

**APPENDIX B**

**SITE MAP**

**AR000088**



HALVERN ICE SITE MAP

**APPENDIX C**

**Malvern TCE Superfund Site Explanation Sheet for the Volumetric Ranking Summary**

**Malvern TCE Superfund Site Generator Volumetric Ranking Summary (by Descending Order)  
dated November 30, 1998**

**Malvern TCE Superfund Site Generator Volumetric Ranking Summary (by Alphabetical Order)  
dated November 30, 1998**

**Malvern TCE Superfund Site Broker/Transporter Volumetric Ranking Summary dated  
November 30, 1998**

AR000090



**Malvern TCE Superfund Site  
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

**PRP Name** = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

**FDA Drums** = The total number for drums sent to the Site before August 1, 1975.

**FDA %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Revised %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan' drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Cost** = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost' and estimated future cost associated with the FDA.

**FDA Premium** = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

**MPA Drums** = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

**MPA %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

**MPA Revised %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums' received by Chemclene Corporation, regardless of date, multiplied by 100.

**MPA Cost** = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost' and estimated future cost associated with the MPA.

**MPA Premium** = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

**Total Payment** = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

' The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

' Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

' The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\*  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Hamilton Watch Co.	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Synflex/Star Grouping											
Star Dental Corporation						610.00	2.21%	2.28%			D, A
Plymouth Tube	9.00	0.39%	0.40%			566.37	2.05%	2.12%			A
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Burrighs Corp.	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Reilly Pitting						430.00	1.56%	1.61%			A
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Morning Call						355.00	1.29%	1.33%			A
Delbar Products						328.50	1.19%	1.23%			A
USG Grouping											
Donn Corporation						292.00	1.06%	1.09%			D, A

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities throughout alphabetical Volumetric Ranking Summary.

E De minimis party.

**Malvern TCE Refund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Kim Manufacturing						283.00	1.03%	1.06%			A
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Aydin						251.82	0.91%	0.94%			A
Beckett Corporation						250.55	0.91%	0.94%			A
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Handy & Harman Tube Co. Inc						229.18	0.83%	0.86%			A
Porter Instruments						228.27	0.83%	0.85%			A
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
Cabot Grouping											
Kawecki Berylco						218.00	0.79%	0.82%			D, A
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$68,089	\$28,829	\$94,918
Defense Reutilization & Marketing Grouping											
DRMS/PNSY						200.72	0.73%	0.75%			D, A
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,066	\$89,160
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912

\* Superceding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000093

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
USG Grouping											
U S G Interiors						182.00	0.66%	0.66%			D, A
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,465	\$70,737
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
Cabot Grouping											
Cabot Berylco						143.00	0.52%	0.54%			D, A
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
S K F Industries Inc.						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
R & E Martin, Inc.						116.29	0.42%	0.44%			C
Syntex/Star Grouping											
Syntex Dental Products						115.00	0.42%	0.43%			D, A
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities through

E ormis party.

AR000094

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Mars Electronics Inc.						110.99	0.40%	0.42%	\$38,083	\$15,740	\$51,822
Netsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,589	\$51,360
Waste Conversion						104.00	0.38%	0.39%			C
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,883	\$11,203	\$36,886
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping						74.00	0.27%	0.28%			D, A
DRMO Knox						73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,540	\$10,269	\$33,809
Spra-Fin Inc.						72.41	0.26%	0.27%			
USG Grouping						71.40	0.26%	0.27%			D, A
Floor Systems Inc.											

\* Superceding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000095

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
Scotco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Welex Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
North Industrial Chemicals						60.00	0.22%	0.22%			C
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Sotataro						57.00	0.21%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping						54.00	0.20%	0.20%			D, A
DRMO PHILADELPHIA											
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Airk Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Delco Wire & Cable, Inc./ Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D Company appears under a grouping, please refer to the combined entities through Alphabetical Volumetric Ranking Summary.

E De minimis party.

**Malvern TCE Refund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
M Q S Inspection Inc./Magnaflex						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
J & J Spill						43.00	0.16%	0.16%			C, A
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Amelek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
USG Grouping						41.00	0.15%	0.15%			D, A
Davey Products											
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	36.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Carvel Haff Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Manorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

AR000097

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Accuracy Scientific Electroly	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	\$15,408 B
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941 B
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	\$14,941
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
<b>Cabot Grouping</b>						27.00	0.10%	0.10%			D, A
Cabot Wrought Products											
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities through Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000098



**Malvern TCE erfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Accometrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Amunuel Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Camdel Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	\$
Metheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Cantol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	\$
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	\$
Deftron Incorporated						18.56	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
Yuasa-Evide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Sikkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

\* Superceding 427/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

AR000099

Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\*  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Pennwall Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
Mida Manufacturing		0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plate Crafters Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Diversified Electronic Corp.						15.53	0.06%	0.08%	\$5,049	\$2,202	\$7,251
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Reppo	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Boetel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000100

**Malvern TCE Refund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Cabot Grouping											
Cabot Company						13.00	0.05%	0.05%			D, A
Defense Reutilization & Marketing Grouping											
Madison, IN						13.00	0.05%	0.05%			D, A
EAM Corporation						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Fabric Development						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Imperial Specialty						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Kosempel						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,108	\$1,791	\$5,897
Connecticut Mired						12.00	0.04%	0.00%	\$0	\$0	B
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,580	\$5,136
Photolastic Inc.	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,580	\$70,775
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,580	\$5,136
Delta Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
Arnes Supply						10.00	0.04%	0.00%	\$0	\$0	B
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B

\* Superceding 4/27/98 VRS

- A De maximus party and does not qualify for de minimis settlement offer.
- B Party has been identified as an orphan.
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.
- D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.
- E De micromis party.

AR000101

Generator Volumetric Ranking Summary\*  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B \$4,202
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B \$4,202
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B \$4,202
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Ellisco						8.36	0.03%	0.03%	\$2,718	\$1,186	\$3,903
<b>Defense Reutilization &amp; Marketing Grouping</b>											
Picaliny Arsenal						8.26	0.03%	0.03%			D, A \$3,754
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Photofabrication Chem & Equip						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Herman Goldner Co. Inc.						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Bigram Gear Company						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
Fendt Finding Co., Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B \$3,268
						7.00	0.03%	0.00%	\$0	\$0	B \$3,268

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E De minimis party.

Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\*  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Met Fin	7.00	0.31%	0.31%	\$29,003	\$12,788	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
ADEC						6.00	0.02%	0.00%	\$0	\$0	\$0
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lovetkin Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,805
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Tele Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fergusson						5.96	0.02%	0.02%	\$1,938	\$845	\$2,783
Boyerstown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ervin Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

AR000103

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Pycoc Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Ext - Corporal						4.00	0.01%	0.00%	\$0	\$0	B
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
McHugh Railroad Maint Equip Co.				\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Monitor Systems	4.00	0.18%	0.18%			4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities throughout

E alphabetical Volumetric Ranking Summary.

AR000104

**Malvern TCE Refund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
NI-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Permut/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
R C Kletzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167

\* Superceding 4/27/98 VRS

A De minimus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entries throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000105

Malvern TCE Superfund Site  
 Generator Volumetric Ranking Summary\*  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Delmaco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Albright Paper & Box Corp.						1.11	0.00%	0.00%			E
Hough/Loew Associates						1.09	0.00%	0.00%			E
A. Duie Pyle						1.00	0.00%	0.00%			E
Ace Service Corp.						1.00	0.00%	0.00%			E
Antenna Corp.						1.00	0.00%	0.00%			E
Cincinnati Time						1.00	0.00%	0.00%			E
Devon Apparel						1.00	0.00%	0.00%			E
Durawood						1.00	0.00%	0.00%			E
Electro Tech Systems Inc.						1.00	0.00%	0.00%			E
Fairchild Space Systems						1.00	0.00%	0.00%			E
HI Services Inc.						1.00	0.00%	0.00%			E

\* Superceding 4/27/98 VRS

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B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities through alphabetical Volumetric Ranking Summary.

E omis party.



Malvern TCE/erfund Site  
Generator Volumetric Ranking Summary\*  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Money Systems						1.00	0.00%	0.00%			E
National Computer Systems						1.00	0.00%	0.00%			E
National Products						1.00	0.00%	0.00%			E
Perfin-Elmer						1.00	0.00%	0.00%			E
Pocono Foundry Inc.						1.00	0.00%	0.00%			E
Schmid Brewery Co.						1.00	0.00%	0.00%			E
Schramm Inc.						1.00	0.00%	0.00%			E
Specialty Glass Products						1.00	0.00%	0.00%			E
Tube Methods						1.00	0.00%	0.00%			E
Tudor Tech Inc.						1.00	0.00%	0.00%			E
Welding Co.						1.00	0.00%	0.00%			E
T R W Inc.						0.45	0.00%	0.00%			E
Budd Co.						0.36	0.00%	0.00%			E
Jenson, Homer						0.36	0.00%	0.00%			E
Witronics						0.30	0.00%	0.00%			E
Lightman Drum Co.						0.27	0.00%	0.00%			C
Mack Electric						0.27	0.00%	0.00%			E
Chester County Intermediate Unit						0.07	0.00%	0.00%			E
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			E
<b>De Minimis Total:</b>	<b>573.00</b>	<b>26.09%</b>	<b>23.49%</b>	<b>\$2,153,827</b>	<b>\$960,287</b>	<b>9654.37</b>	<b>35.69%</b>	<b>33.51%</b>	<b>\$2,796,132</b>	<b>\$1,219,287</b>	<b>\$7,123,333</b>
<b>Total:</b>	<b>2263.71</b>	<b>100.00%</b>	<b>100.00%</b>			<b>27606.87</b>	<b>100.00%</b>	<b>100.00%</b>			

\* Superceding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De micromis party.

**Malvern TCE Superfund Site  
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.<sup>1</sup>

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>3</sup> and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>1</sup> received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>3</sup> and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>3</sup> The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
A Duke Pyle						1.00	0.00%	0.00%			D
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Accumetics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Aca Service Corp.						1.00	0.00%	0.00%			D
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Adetphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Albright Paper & Box Corp.						1.11	0.00%	0.00%			D
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,236	\$18,861	\$264,984

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

AR000109

Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\*  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Amuneal Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Antenna Corp.						1.00	0.00%	0.00%			D
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Athens Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Aydin						251.82	0.91%	0.94%			A
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Beckett Corporation						250.55	0.91%	0.94%			A
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Benditru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Bligram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Boedel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Boyetown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401

\* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volu

D De micromis party.

AR000110

Malvern TCE Superfund Site  
Generator Volume Ranking Summary\*  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Brunbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Budd Co.						0.36	0.00%	0.00%			D
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Burroughs Corp.	147.00	6.44%	6.56%			519.54	1.88%	1.95%			A
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cabot Grouping						401.00	1.45%	1.50%			A
Cabot Berylco						143.00	0.52%	0.54%			A
Cabot Wrought Products						27.00	0.10%	0.10%			A
Cabot Company						13.00	0.05%	0.05%			A
Kawecel Berylco						218.00	0.79%	0.82%			A
Camdel Metals						21.00	0.06%	0.06%	\$6,827	\$2,978	\$9,805
Carlot Inc.						20.09	0.07%	0.06%	\$6,531	\$2,849	\$9,380
Carvel Hill Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Chester County Intermediate Unit						0.07	0.00%	0.00%			D
Chobert Associates						85.15	0.31%	0.32%	\$27,662	\$12,075	\$39,737
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
Cincinnati Time						1.00	0.00%	0.00%			D
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Clifton Precision						82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Coatings For Industry Inc.	34.00	1.49%	1.52%	\$140,870	\$62,015	6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

\* Superceding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

AR000111

Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\*  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Defense Reutilization & Marketing Grouping						349.98	1.27%	1.31%			A
Medison, IN						13.00	0.05%	0.05%			A
DRMS/PNSY						200.72	0.73%	0.75%			A
DRMO PHILADELPHIA						54.00	0.20%	0.20%			A
Picatinny Arsenal						8.26	0.03%	0.03%			A
DRMO Knox						74.00	0.27%	0.28%			A
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Delbar Products						328.50	1.19%	1.23%			A
Delco Wire & Cable, Inc./ Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B
Delmaco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Deitron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\*  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Delta Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
DeVibiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Devon Apparel						1.00	0.00%	0.00%			D
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Durawood						1.00	0.00%	0.00%			D
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
East West Label Co. Inc.				\$149,157	\$65,663	49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Eaton	36.00	1.58%	1.61%	\$252,738	\$111,262	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Elco Corporation	61.00	2.67%	2.73%			61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
Electro Tech Systems Inc.						1.00	0.00%	0.00%			D
Electrolay						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Elisaco						8.36	0.03%	0.03%	\$2,718	\$1,166	\$3,903
Emeco				\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Empire Abrasive & Equipment Corp.	3.00	0.13%	0.13%			103.80	0.39%	0.39%	\$33,745	\$14,720	\$48,465
Erwins Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ext -Corporal						4.00	0.01%	0.00%	\$0	\$0	B

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

Malvern TCE Superfund Site  
 Generator Volumetric Ranking Summary\*  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fairchild Space Systems						1.00	0.00%	0.00%			D
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Fergusson						5.96	0.02%	0.02%	\$1,938	\$845	\$2,783
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Frazer-Voipe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

\* Superceding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

AR000114



**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
H I Services Inc.						1.00	0.00%	0.00%	\$0	\$0	D
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Hamilton Watch Co.						904.00	3.27%	3.39%			A
Handy & Harman Tube Co. Inc	197.00	8.63%	8.81%			229.18	0.83%	0.86%			A
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Hough/Loew Associates						1.09	0.00%	0.00%			D
Hulttronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Industrial Systems Design						2.84	0.01%	0.00%	\$0	\$0	B
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
J & J Spill						43.00	0.16%	0.16%			C
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695
Jenson, Homer						0.36	0.00%	0.00%			D
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918

\* Superceding 4/27/86 VRS

- A De maximus party and does not qualify for de minimis settlement offer.
- B Party has been identified as an orphan.
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.
- D De micromis party.

AR000115

Malvern TCE Superfund Site  
 Generator Volumetric Ranking Summary\*  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Kim Manufacturing						283.00	1.03%	1.06%	\$4,226	\$1,844	A
Kosempel						13.00	0.05%	0.05%	\$2,276	\$993	\$3,268
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$6,027	\$2,629	\$8,657
Kulicke & Soffa						18.54	0.07%	0.07%	\$975	\$425	\$1,401
L & S Tool and Machine Co.	12.00	0.53%	0.54%			415.00	1.50%	1.55%	\$9,428	\$4,113	\$13,540
LaFrance Corp.						29.00	0.11%	0.11%	\$13,979	\$6,098	\$20,077
Laminators Inc.						43.00	0.16%	0.16%	\$61,622	\$26,881	\$88,503
Lancaster Machinery Co.						189.55	0.69%	0.71%	\$47,373	\$20,665	\$68,038
Lavelle Aircraft Co.						145.72	0.53%	0.55%			C
Leeds & Northrop						0.27	0.00%	0.00%	\$975	\$425	\$1,401
Lightman Drum Co.						3.00	0.01%	0.01%	\$8,453	\$3,687	\$12,140
Lincoln						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
London Harness & Cable Co.						2.55	0.01%	0.00%	\$0	\$0	B
Lovekin Corporation						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
Lowry's						0.27	0.00%	0.00%	\$0	\$0	D
M Q S Inspection Inc./Magnaflux						12.00	0.04%	0.00%	\$0	\$0	B
Mack Electric						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
Mack Wayne Plastics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201
Malco											
Manorgraphics											

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000116

**Malvern TCE Perfund Site  
Generator Volumetric Ranking Summary\***  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Mars Money Systems						1.00	0.00%	0.00%			D
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Mel Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$983	\$45,039
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,236	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Morning Call						355.00	1.29%	1.33%			A
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
National Computer Systems						1.00	0.00%	0.00%			D
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
National Products						1.00	0.00%	0.00%	\$0	\$0	D
National Solvents Inc.						156.00	0.57%	0.00%			B
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

AR000117

Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\*  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
North Industrial Chemicals						60.00	0.22%	0.22%			C
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Pennwalt Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Perkin-Elmer						1.00	0.00%	0.00%			D
Permutit/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C

\* Superceding 4/27/96 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\*  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Photofabrication Chem & Equip											
Photolastic Inc.	11.00	0.48%	0.49%	\$45,576	\$20,064	7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Pitman Corp.						11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
Plate Crafters Inc.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
Plymouth Tube	9.00	0.39%	0.40%			16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Pocono Foundry Inc.						566.37	2.05%	2.12%			A
Poly Sciences						1.00	0.00%	0.00%			D
Ponderosa Disposal Co.						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912
Porter Instruments						10.00	0.04%	0.00%			C, B
Precision Arts Mfg.						228.27	0.83%	0.85%			A
Princo Instruments Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Prodelin Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Pyco Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Quaker City Chemicals	7.00	0.31%	0.31%			5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
R & E Martin, Inc.						268.09	0.97%	1.00%			C, A
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	116.29	0.42%	0.44%	\$57,542	\$25,101	\$273,594
R C Kietzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Reilly Plating						430.00	1.56%	1.61%			A
Repro	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
S K F Industries Inc.						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267

\* Superceding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Santivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Schmidt Brewery Co.						1.00	0.00%	0.00%			D
Schramm Inc.						1.00	0.00%	0.00%			D
Scotco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Sikkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%		\$0	A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Glass Products						1.00	0.00%	0.00%			D
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Superior Metal Products						58.00	0.21%	0.22%	\$18,656	\$8,225	\$27,081
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Syntex/Star Grouping						726.00	2.63%	2.72%			A
Syntex Dental Products						115.00	0.42%	0.43%			A
Star Dental Corporation						610.00	2.21%	2.28%			A
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
T R W Inc.						0.45	0.00%	0.00%			D
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
Tele Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			D
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Tube Methods						1.00	0.00%	0.00%			D

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

AR000121

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Tudor Tech Inc.						1.00	0.00%	0.00%			D
U S Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
<b>USG Grouping</b>						<b>686.40</b>	<b>2.12%</b>	<b>2.20%</b>			<b>A</b>
U S G Interiors						182.00	0.66%	0.68%			A
Floor Systems Inc.						71.40	0.26%	0.27%			A
Donn Corporation						292.00	1.06%	1.09%			A
Davey Products						41.00	0.15%	0.15%			A
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Vishay Resisive Systems						241.00	0.87%	0.90%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Waste Conversion						104.00	0.38%	0.39%			C
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Welding Co.						1.00	0.00%	0.00%			D
Welx Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%	\$7,477	\$3,262	\$10,739
Westinghouse						23.00	0.08%	0.09%	\$0	\$0	B
Wilkinson Industries						3.00	0.01%	0.00%			D
Witronics						0.30	0.00%	0.00%			
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000122



Malvern TCE Refund Site  
 Generator Volumetric Ranking Summary\*  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
<b>De Minimis Total:</b>	<b>873.00</b>	<b>25.00%</b>	<b>23.48%</b>	<b>\$2,158,827</b>	<b>\$950,287</b>	<b>9664.37</b>	<b>36.69%</b>	<b>33.61%</b>	<b>\$2,796,132</b>	<b>\$1,219,287</b>	<b>\$7,123,333</b>
<b>Total:</b>	<b>2283.71</b>	<b>100.00%</b>	<b>100.00%</b>			<b>27608.87</b>	<b>100.00%</b>	<b>100.00%</b>			

\* Superseding 4/27/98 VRS

- A De maximus party and does not qualify for de minimis settlement offer.
- B Party has been identified as an orphan.
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.
- D De micromis party

**Malvern TCE Superfund Site  
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.<sup>1</sup>

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

**PRP Name** = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

**FDA Drums** = The total number for drums sent to the Site before August 1, 1975.

**FDA %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Revised %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Cost** = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>3</sup> and estimated future cost associated with the FDA.

**FDA Premium** = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

**MPA Drums** = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

**MPA %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

**MPA Revised %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>1</sup> received by Chemclene Corporation, regardless of date, multiplied by 100.

**MPA Cost** = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>3</sup> and estimated future cost associated with the MPA.

**MPA Premium** = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

**Total Payment** = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>3</sup> The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

Malvern TCI erfund Site  
 Broker/Transporter Volumetric Ranking Summary\*

PRP Name	FDA		Revised		FDA		MPA		Revised		MPA		Broker/Transporter		Generator	
	Drums	FDA %	FDA %	FDA Cost	Premium	Drums	MPA %	MPA %	MPA %	MPA %	MPA Cost	Premium	Total Payment	Total De Minimis Payment	Total De Minimis Payment	Total De Minimis Payment
Continental Vanguard, Inc.						89.36	0.32%	0.33%	\$29,062	\$12,677	\$41,739	\$30,571	\$72,310			
Eldredge, Inc.						549.53	1.99%	2.06%						A		
F T C Hazardous						89.91	0.33%	0.34%	\$29,240	\$12,755	\$41,996	\$0	\$41,996			
Inland Pumping & Dredging Corp.						67.00	0.24%	0.00%						B		
J & J Spill						115.54	0.42%	0.43%	\$37,576	\$16,391	\$53,967	\$20,085	\$74,052			
Keystone-Block Transportation						723.27	2.62%	2.71%						A		
Lightman Drum Co.						48.00	0.17%	0.18%	\$15,611	\$6,810	\$22,420	\$126	\$22,546			
North Industrial Chemicals						24.00	0.09%	0.09%	\$7,805	\$3,405	\$11,210	\$28,025	\$38,235			
P Q Corporation						67.00	0.24%	0.25%	\$21,790	\$9,505	\$31,295	\$0	\$31,295			
Philadelphia Steel Drum Co. Inc.						43.00	0.16%	0.16%	\$13,984	\$6,100	\$20,085	\$0	\$20,085			
Phillips & Jacob	20.00	0.88%	0.89%	\$82,865	\$38,479	20.00	0.07%	0.07%	\$6,504	\$2,837	\$128,686	\$25,804	\$154,490			
Ponderosa Disposal Co.						111.00	0.40%	0.00%						B		
Quaker City Chemicals	52.00	2.28%	2.33%			333.11	1.21%	1.25%						A		
R & E Martin, Inc.						55.00	0.20%	0.21%	\$17,887	\$7,803	\$25,690	\$54,317	\$80,007			
Resource Technology Services, Inc.						206.27	0.75%	0.77%						A		
Waste Conversion						38.00	0.14%	0.14%	\$12,358	\$5,391	\$17,749	\$97,154	\$114,903			
Waste Consulting & Brokerage						5.36	0.02%	0.02%	\$1,743	\$760	\$2,504	\$0	\$2,504			
U.S. Environmental Services						4.00	0.01%	0.01%	\$1,301	\$567	\$1,868	\$0	\$1,868			
<b>Total:</b>	<b>72.00</b>	<b>3.16%</b>	<b>3.22%</b>	<b>\$82,865</b>	<b>\$38,479</b>	<b>2689.36</b>	<b>9.36%</b>	<b>9.02%</b>	<b>\$194,861</b>	<b>\$86,001</b>	<b>\$399,209</b>	<b>\$268,082</b>	<b>\$655,291</b>			

\* Superseding 4/27/98 VRS.

A Party does not qualify for *de minimis* settlement offer.

B Party has been identified as an orphan.

AR000125

# Malvern TCE Volumetric Ranking Summaries/Overview and Methodology

This document provides a general overview and describes methodology utilized by EPA in the preparation of the Malvern TCE Superfund Site ("Site") Volumetric Ranking Summaries dated November 30, 1998 ("Summaries"). A description of *de minimis* settlement eligibility and requirements also is provided.

## I. VOLUMETRIC RANKING SUMMARIES: OVERVIEW

The volumetric ranking summaries reflect revisions made by EPA to draft Site volumetric ranking summaries prepared by EPA and distributed to potentially responsible parties ("PRPs") for the Site on November 3, 1997 and April 30, 1998. Among other things, the attached Summaries incorporate information obtained by EPA as a result of: a) EPA's review and/or reconsideration of challenges submitted by PRPs to EPA to prior draft Site volumetric ranking summaries; b) review by EPA of Site records; and c) EPA research into the continued existence and viability of various PRPs identified in connection with the Site.

### A. Generator and Transporter Volumetric Ranking Summaries

EPA has prepared two volumetric ranking summaries for the Site: a Generator Volumetric Ranking Summary ("Generator VRS") and a Broker/Transporter Volumetric Ranking Summary ("Broker/Transporter VRS"). As a result of EPA's review of Site records documenting transactions between PRPs and Chemclene, a number of brokers/transporters have been identified. The Summaries are intended to reflect all generator and broker/transporter PRP transactions at the Site and to attribute to each generator and broker/transporter identified at the Site, the full volume of waste into the Site contributed by each, as reflected in Site records. All documented shipments of waste to the Site are reflected in the Generator VRS; transactions involving brokers/transporters also are reflected in the Broker/Transporter VRS. See Section II.D. of this Overview and Methodology for additional details relating to generator and broker/transporter transactions.

### B. Information contained in Summaries

In general, the attached Summaries provide the following for each PRP:

#### 1. The volume of waste each PRP contributed to the Site.

This volume reflects, for each PRP, the total volume of waste, as measured in 55-gallon drum units, each PRP contributed to the Former Disposal Area ("FDA") and the Main Plant Area ("MPA") of the Site, areas used by Chemclene as part of its operations. These amount are reflected in the "FDA Drums" and the "MPA Drums" columns of the Summaries. See Section II.B.3. of this Overview and Methodology for details regarding EPA's methodology

relating to the FDA and MPA.

2. The percentage of waste each PRP contributed to the FDA and MPA.

This percentage reflects each PRP's percentage of waste contributed to the FDA and MPA, relative to the percentage of total waste sent by all PRPs to the FDA and MPA, respectively. These percentages are reflected in the "FDA %" and "MPA %" columns of the Summaries.

3. The revised percentage of waste each PRP contributed to the FDA and MPA.

EPA has determined that some Site PRPs are no longer financially viable corporate entities, and, therefore, are Site "orphans" that will not participate in any *de minimis* settlement with EPA. These orphan shares have been apportioned on a *pro rata* basis among non-orphan Site PRPs. This apportionment is reflected in the "Revised FDA %" and "Revised MPA %" columns of the Summaries.

4. De minimis settlement payment required of each settling de minimis PRP.

The Summaries include each eligible *de minimis* PRP's share of costs such PRP will be required to pay in order to participate in a *de minimis* settlement with EPA. The total payment required of each *de minimis* PRP is reflected in the "Total Payment" column of the Summaries. The total payment required of each PRP includes each PRP's share of costs associated with the FDA and MPA, as set forth in the "FDA Cost" and "MPA Cost" columns of the Summaries. In addition, the total payment required of each PRP includes a premium payment assessed by EPA to take into account remedy and cost risks assumed by EPA in connection with the Site and the *de minimis* settlement. The premium is not assessed on EPA's past costs, but only on the estimated future costs. Premiums are reflected in the "FDA Premium" and "MPA Premium" columns of the Summaries.

See the Explanation Sheets attached to the Summaries for additional details regarding the information contained in the Summaries.

## II. METHODOLOGY UTILIZED BY EPA WHEN CREATING THE VOLUMETRIC RANKING SUMMARIES

### A. Documents Used

The Summaries prepared for the Site were compiled using Site documents obtained by EPA from Chemclene. These documents, which include invoices, receipts, purchase orders, manifests, and a number of other related documents, refer to transactions dating from 1968 until 1992 between Chemclene and its customers. These documents memorialize a number of

different types of transactions, reflecting the varied nature of Chemclene's business and Chemclene's changing billing practices. Examples of the transactions reflected in the documents include, but are not limited to:

1. Shipment of solvent and non-solvent waste from waste generators to Chemclene for processing and/or disposal;
2. Transshipments of solvent and non-solvent waste from Chemclene to other treatment, storage and disposal facilities;
3. Transfer of reclaimed solvents from Chemclene back to the original waste generator;
4. Transfer of raw or reclaimed solvent from Chemclene to customers;
5. Return of unused solvents or unused empty drums from customers to Chemclene;
6. Transfer of empty drums from Chemclene to waste generators to be filled up with wastes;
7. Purchases of raw materials by Chemclene;
8. Sale of services (such as waste sampling or transport services) by Chemclene to customers; and
9. Charges by Chemclene for off-Site disposal of still-bottoms resulting from the on-Site processing of wastes.

B. Interpretation of Documents

1. Waste into the Site

Based upon its understanding of Chemclene's operations, EPA has assumed that any unit of waste shipped to the Site was just as likely to have become a contaminant in the environment as any other unit of waste.

In preparing the volumetric ranking, EPA has examined carefully the Site documents to determine which transactions indicate the shipment of waste to Chemclene, and to determine the volume of these shipments.

The majority of transactions reflected in the Summaries are documented by a Chemclene invoice. In many instances, however, there are other documents that reveal the

details of the transaction more clearly than the invoice. For most transactions, the nature of the transaction is clear regardless of which document is examined. However, in some cases the nature of the transaction becomes clear only by comparing two or more documents. In all instances, EPA looked at all of the documents related to a transaction before determining how to interpret the documents.

## 2. Time Period Summarized

For purposes of preparing the VRS, EPA reviewed and summarized existing Site documents, which refer to the 1968 to 1992 time period. EPA is aware that Chemclene operations at the Site commenced in approximately 1952. However, since EPA does not have information relating to the 1952 to 1968 period of Chemclene operations, EPA has made no assumptions regarding waste transactions during that time period, and has not attempted to summarize waste transactions during that time period. Available information indicates that Chemclene withdrew its Part B Application submitted pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 *et seq.*, to operate as a treatment and storage facility, and stopped accepting waste solvent for reclamation in July 1992.

## 3. Main Plant Area and Former Disposal Area

Information available to EPA indicates that Chemclene utilized both the MPA and FDA as part of Chemclene's operations. At all times during its operation, until approximately July 1992, Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including hazardous substances. All wastes sent to the Site initially went to the MPA. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations. Chemclene also disposed of wastes, including hazardous substances, at the FDA. Chemclene claims that disposal at the FDA ceased when new management took over the business in approximately August 1975, at which point Chemclene discontinued use of the FDA and disposed of waste generated from the reclamation process off-Site.

Based upon the foregoing information, when preparing the volumetric ranking summaries for the Site, EPA counted all waste transactions between Chemclene and PRPs during the 1968 to August 1975 time period as waste into both the MPA and the FDA. EPA has counted waste transactions between Chemclene and PRPs after August 1, 1975, only as waste into the MPA.

The distinction between the MPA and the FDA is meaningful in two ways: a) in the setting of the cut-off delineating which PRPs may be eligible to participate in a *de minimis* settlement; and b) in determining the amount of monies eligible *de minimis* PRPs will be required to pay in order to participate in a *de minimis* settlement with EPA.

Each PRP's eligibility for *de minimis* status will be determined using the percentage of the total waste sent to the Site by the PRP. This percentage is set forth in the

"MPA %" column of the Summaries, since all waste into the Site was received and processed by Chemclene at the MPA.

The Site remedy selected by EPA in its Record of Decision dated November 26, 1997, has provided for distinct remedies for the MPA and FDA. Even though significant aspects of the cleanup of the MPA and the FDA may be combined, EPA believes that costs of the remedy can be allocated fairly between the two areas. EPA separately has calculated the *de minimis* settlement payments of each eligible *de minimis* PRPs for the MPA and FDA and has added these amounts to obtain a "Total Payment" required.

#### 4. Transshipments

Based upon EPA's understanding of Chemclene's operations and review of Site records, EPA has determined that some waste received by Chemclene at the Site likely was transhipped off-Site, e.g. shipped off-Site for processing and/or disposal. Information available to EPA indicates that Chemclene often would containerize and store at the Site these wastes for off-Site shipment at some later date, and that releases or threatened releases of these wastes at the Site occurred as a result of Chemclene's practice.

EPA did not count as waste into the Site, transactions that appear to reflect that waste was sent off-Site for processing or disposal *only* in those instances where EPA could document, typically through its review of waste manifests, that such wastes remained in their original shipping containers and were not bulk-stored or otherwise opened and handled on-Site, prior to off-Site shipment.

#### C. Units of Measurement

To the extent applicable, EPA has prepared the volumetric ranking in accordance with OSWER Directive 9835.16, "Guidance to Preparing and Releasing Waste-In Lists and Volumetric Rankings to PRPs Under CERCLA," dated February 22, 1991. The most common unit of shipment was the 55-gallon drum, and therefore all other units found in the documentation were converted to 55-gallon drum units. When units were listed in gallons or other units of volume, simple mathematics was used to convert into drum units. For those entries with less than 55 gallons, a decimal was used. For example, if the documents indicated ten 30-gallon containers of waste shipped to Chemclene, then the 300 gallons of waste would be divided into 55-gallon units yielding 5.45 drums.

In a comparatively few instances, shipments of waste were listed in units of weight or other units. In these instances EPA used the following assumptions:

- For those entries listing pounds as the measurement unit, EPA's standard conversion factor of 1 gallon = 8.33 pounds was extrapolated to 55 gallons = 458 pounds.



- 1 can = 5 gallons.
- 1 bottle = 1 gallon.
- 1 lab pack = 1 gallon.

In addition, a small number of transactions indicated the shipment to Chemclene of "empty" drums or other containers which are listed as "used" or "dirty" or some other language indicating that the container had at one time contained waste. In these instances EPA assumed that the container contained 3% of its capacity in hazardous wastes, based upon the definition of "empty" in the RCRA regulations. See 40 C.F.R. § 261.7.

#### D. Brokers/Transporters

As a result of its review of Site documents, EPA has identified a number of PRPs that appear to have acted as brokers and/or transporters of waste to the Site. EPA has included broker/transporter PRPs in the Summaries.

Most Site records that identify brokers/transporters refer to brokers/transporters with whom it appears Chemclene dealt directly. A number of Site records, for example, reflect that Chemclene directly billed and/or credited such brokers/transporters with regard to waste transactions at the Site.

The Site records that refer to broker/transporter PRPs identify two types of transactions: 1) transactions in which a broker/transporter appears to have arranged for the transport or disposal of or transported waste generated by a third-party to the Site, and in which both the broker/transporter and the generator are expressly identified in the corresponding Site record; and 2) transactions between a broker/transporter and Chemclene where no third-party generator has been identified. In the latter instance the documentation is the same as for any other generator, and the party listed on the documentation is thus treated as a generator for those transactions, even if the same party may have acted as a broker/transporter in other instances.

Consistent with OSWER Directive 9835.16, whenever a Site record reflects a transaction in which both a generator PRP and a broker/transporter PRP are expressly identified, EPA has attributed the waste volume referred to in each such transaction to both the generator and the broker/transporter for purposes of compiling waste-in information contained in the Summaries. However, EPA has counted the total waste referred to in these transactions only once for purposes of determining total waste contributed to the Site by all PRPs.

The Generator VRS summarizes waste volume information: 1) for each generator PRP; and 2) for each broker/transporter PRP only with regard to those broker/transporter transactions with Chemclene for which no corresponding third-party generator has been identified. As set forth above, in cases where a third-party generator is not identified, the party named on the

invoice or other documentation has been treated as a generator for that transaction even if the party involved has been identified as a broker/transporter for other transactions.

The total waste contributed to the Site by all PRPs appears at the end of the Generator VRS.

EPA has prepared a separate Broker/Transporter VRS in order to summarize those waste-in transactions in which both a broker/transporter and a generator have been identified. The waste volume reflected in these transactions also has been summarized for each corresponding generator in the Generator VRS. By preparing a separate Broker/Transporter VRS, EPA can attribute to each broker/transporter the waste reflected in these transactions, but avoid double-counting the waste when determining total waste contributed to the Site by all Site PRPs (as reflected in the Generator VRS).

Broker/transporter PRPs should refer to both the Generator VRS and the Broker/Transporter VRS in order to determine waste volume and percentage information.

For purposes of a *de minimis* settlement, both the generator and the broker/transporter will be liable for the full amount of the waste in a transaction involving both a generator and a broker/transporter. In other words, for some shipments two parties both will be fully liable for the share of the cleanup represented by those drums. However, parties can avoid full liability if the broker/transporter and the generator cooperate with each other and agree to an allocation between themselves. In such instances, the broker/transporter and the generator may *jointly* settle with EPA for the full amount of the wastes in question, and avoid having to *each* pay for the wastes.

#### E. Grouped PRPs

Based upon information obtained by EPA, EPA has concluded that some Site PRPs are related or successor entities to other Site PRPs. EPA has grouped related/successor entities in the attached Summaries. For each such grouping, EPA has determined the grouping's total volume and percentage liability at the Site based upon the combined totals of each related/successor entity. Total volume and percentage information for each grouping is set forth in the Generator VRS that is arranged alphabetically by PRP. Total volume and percentage information for each grouping is set forth under the name of the PRP grouping and appears in bold print. Volume and percentage information for each separate related/successor PRP member of the grouping also is set forth in the Summaries.

#### F. Orphan PRPs

When a PRP is unable to pay all or part of its allocated share of a cleanup, EPA may allocate such a share among the viable PRPs in the same ratio as other cleanup costs. Pursuant to EPA's "Orphan Share" policies, EPA, under certain circumstances, may pay (from the

Superfund) a portion of the shares of PRPs that are completely non-viable. Orphan share funding may be available only to PRPs that agree to implement and fund remedial actions at a site, and not to *de minimis* PRPs. *De minimis* PRPs may be asked to pay on a *pro rata* basis for any shares for which the orphan PRPs are unable to pay. In addition, the *de minimis* premium will take into consideration the likelihood that additional such shares will be identified subsequent to the conclusion of the *de minimis* settlement.

When EPA has been able to identify a PRP as an orphan in the attached summaries, EPA has included for each such PRP, total volume and percentage information. EPA does not anticipate that Site orphans will participate in the *de minimis* settlement or otherwise pay monies towards Site remediation. Therefore, EPA has not included payment information for any Orphan. In addition, EPA has revised each non-Orphan PRP percentage ("Revised FDA %" and "Revised MPA %"), reflecting each non-orphan PRPs *pro rata* payment share for each Site orphan.

The calculation of the revised percentages has been done on a transaction by transaction basis. If a transaction involves an orphan generator, then the transaction was checked to determine if there was a broker/transporter for the same transaction. A transaction has been divided on a *pro rata* basis among the remaining PRPs only if there is *neither* a viable generator *nor* a viable broker/transporter for the transaction.

### III. *DE MINIMIS* SETTLEMENT

#### A. *De Minimis* Cutoff

EPA has established a cut-off for *de minimis* settlement eligibility using a percentage of the total waste sent to the Site by the PRP. A PRP is eligible to participate in a *de minimis* settlement if its volumetric contribution of hazardous substances to the Site is at or less than 0.75% of the total volume attributed to the MPA. Pre-August 1975 percentages that have been assigned for the FDA have not been considered by EPA when establishing the *de minimis* settlement eligibility cutoff. However, such percentages have been considered by EPA when determining the amount of money each *de minimis* PRP will be asked to pay if it desires to settle.

EPA has also established a *de micromis* cutoff at 1.5 drums or less. EPA does not foresee a need for settlements with *de micromis* parties. EPA will, however, pursue settlements with *de micromis* parties if there is a threat of, or an actual suit by, other PRPs at the Site.

#### B. *De Minimis* Payments

The attached Summaries contain *de minimis* settlement payment information for each eligible *de minimis* settlement. EPA has divided the costs of the selected remedy, as set forth in the ROD, between the MPA and FDA, and has determined each *de minimis* PRP's required settlement payments for each of these areas of the Site. A PRP's required *de minimis* payment is

determined based upon its revised percentages for the FDA and the MPA. These revised percentages are then applied to the total costs estimates for the MPA and the FDA.

As of June 17, 1997, EPA incurred approximately \$2,214,705.00 in response costs ("Past Response Costs") at or in connection with the Site. Since EPA incurred the Past Response Costs as a result of activities that pertained to both the FDA and MPA, EPA has attributed one-half (\$1,107,352.00) of the Past Response Costs to FDA costs and the other one-half (\$1,107,352.00) to MPA costs. EPA has estimated future Site costs associated with cleanup and EPA oversight of the Site to be approximately \$15,729,151.00 (\$15,529,151.00 in remedial costs; \$200,000.00 in EPA remedial oversight). Of that amount, approximately \$8,155,725.00 has been attributed by EPA to cleanup of the FDA (\$8,055,725.00 in remedial costs; \$100,000.00 in EPA remedial oversight). Future costs associated with cleanup and EPA oversight of the MPA are approximately \$7,573,426.00. (\$7,473,426.00 in remedial costs; \$100,000.00 in EPA remedial oversight).

EPA has assessed a premium, which each *de minimis* PRP must pay in addition to each PRP's percentage of FDA and MPA costs, in order to participate in the *de minimis* settlement with EPA. The premium is intended to take into account a number of Site factors and risks, including additional remedial action and potential response cost overruns, that EPA may encounter when settling with *de minimis* PRPs. EPA has established a premium of 50% in this matter, i.e. a multiplier of .50.

# Malvern TCE Superfund Site Volumetric Ranking Challenges and EPA's Response

The Final Volumetric Ranking Summaries dated November 30, 1998 ("Summaries") reflect, among other things, revisions made by EPA in response to comments and challenges received from PRPs with regard to prior draft volumetric ranking summaries distributed by EPA for review.

A number of the comments and challenges submitted by PRPs were PRP-specific counting challenges, referring to individual PRP waste-in determinations of EPA. However, certain comments and challenges submitted pertained to the overall methodology utilized by EPA when preparing the Summaries.

The following sets forth the most common methodology comments and challenges reviewed by EPA and EPA's response to the same<sup>1</sup>:

## 1. COMMENT:

The volumetric ranking summaries should include all broker/transporter PRPs at the Site. EPA should allocate generators and brokers/transporters percentage shares of liability at the Site.

## EPA'S RESPONSE:

As a result of its review of Site documents, EPA has identified a number of PRPs that appear to have acted as brokers and/or transporters of waste to the Site. EPA has included all identified broker/transporter PRPs and broker/transporter transactions in the Summaries.

Most Site records that identify brokers/transporters refer to brokers/transporters with whom it appears that Chemclene dealt directly. A number of Site records, for example, reflect that Chemclene directly billed and/or credited such brokers/transporters with regard to waste

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<sup>1</sup> This document is intended to discuss only common methodology comments and challenges submitted by Site PRPs to EPA. Any PRP that submitted a PRP-specific counting challenge may contact Gary Morton, EPA Civil Investigator, to obtain information regarding EPA's review of its challenge. Inquiries should be sent in writing to:

Gary Morton, 3HS11  
Civil Investigator  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

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transactions at the Site. A number of the brokers/transporters identified appear to have provided services involving the Site on behalf of a variety of generators.

The Site records that refer to broker/transporter PRPs typically identify two types of transactions: 1) transactions in which a broker/transporter appears to have arranged for the transport or disposal of or transported waste generated by a third-party to the Site, and in which both the broker/transporter and the generator are expressly identified in the corresponding Site record; and 2) transactions between a broker/transporter and Chemclene, where no third-party generator has been identified, but the party on the documentation acted as a broker/transporter in other transactions with Chemclene.

Whenever a Site record reflects a transaction in which both a generator PRP and a broker/transporter PRP are expressly identified, consistent with OSWER Directive 9835.16, ("Guidance on Preparing and Releasing Waste-In Lists and Volumetric Rankings to PRPs under CERCLA," dated February 22, 1991), EPA has attributed the waste volume referred to in each such transaction to both the generator and the broker/transporter for purposes of compiling waste-in information contained in the Summaries. However, EPA has counted the total waste referred to in these transactions only once for purposes of determining total waste contributed to the Site by all PRPs.

EPA has created a Generator VRS, which summarizes waste volume information for: 1) each generator PRP; and 2) each broker/transporter PRP only with regard to those broker/transporter transactions with Chemclene for which no third-party generator has been identified. In cases where a third-party generator is not identified, the party named on the invoice or other documentation has been treated as a generator for that transaction even if the party involved has been identified as a broker/transporter for other transactions. As a practical matter, it makes no difference to a party whether it is listed as a generator or a broker/transporter for a particular transaction - in either instance the transaction will be counted toward the party's total. The Generator VRS reflects the total waste contributed to the Site by all PRPs.

EPA has prepared a separate Broker/Transporter VRS in order to summarize those waste-in transactions in which both a broker/transporter and a generator have been identified. The waste volume reflected in these transactions also has been summarized for each corresponding generator in the Generator VRS. By preparing a separate Broker/Transporter VRS, EPA can attribute to each broker/transporter the waste reflected in these transactions, but avoid double-counting the waste when determining total waste contributed to the Site by all Site PRPs (as reflected in the Generator VRS).

## 2. **COMMENT:**

EPA erroneously counted as waste into the Site materials that were sent to the Site but shipped off-Site for disposal.

### **EPA'S RESPONSE:**

Based upon its understanding of Chemclene's operations and its review of Site records, EPA has determined that some waste received by Chemclene at the Site was shipped off-Site for processing and/or disposal. Information available to EPA indicates that Chemclene often would containerize and store these wastes at the Site for off-Site shipment at some later date, and that releases or threatened releases of these wastes at the Site occurred as a result of Chemclene's practice.

EPA did *not* count waste transactions that appear to reflect that waste was sent off-Site for processing or disposal. In order for such transactions not to be counted by EPA, EPA must have been able to document that such wastes remained in their original shipping containers and were not bulk-stored or otherwise opened and handled on-Site, prior to off-Site shipment.

### **3. COMMENT:**

Pre-1968 transactions with Chemclene should be included in EPA's waste-in determinations relating to the Site.

### **EPA'S RESPONSE:**

Information currently available to EPA indicates that Chemclene utilized the Site for its waste reclamation operations from approximately 1959 to 1992. The Site records that have been utilized by EPA when preparing the Summaries refer only to the 1968 to 1992 time period. EPA has not attempted to incorporate pre-1968 transactions at the Site into the Summaries. EPA has no evidence as to the identity of PRPs or the quantity and/or nature of waste transactions with Chemclene during the pre-1968 time period, and is unable and unwilling to speculate as to this information.

EPA also has not identified pre-1968 transactions as transactions for which orphan share funding should be made available. When a PRP is unable to pay its allocated share of a cleanup, EPA may allocate such a share among the viable PRPs in the same ratio as other cleanup costs. Pursuant to EPA's "Orphan Share" policy, under certain circumstances, EPA may pay (from the Superfund) a portion of the shares for PRPs that are completely non-viable. Orphan share funding may be available only to PRPs that agree to implement and fund remedial actions at a site, and not to *de minimis* PRPs.

When EPA has been able to identify a Site PRP as an orphan, EPA has incorporated this information in the Summaries. EPA has not attempted to calculate any pre-1968 orphan share, since EPA has no information as to the identity of any pre-1968 Site PRPs, nor as to any such PRPs' current corporate status.

4. **COMMENT:**

The owners/operator of the Site should be included in the Summaries.

**EPA'S RESPONSE:**

EPA has identified Chemclene as a PRP based upon its Site owner/operator status. Lloyd Balderston, Chemclene's sole shareholder, has been notified of his status as PRP at the Site due to his position as a Site operator during periods in which releases occurred. In addition, Ruth Balderston has been identified as a PRP based upon her status as a past owner of the Site during a period in which releases occurred.

Chemclene and the Balderstons have not been allocated shares in the Summaries. In accordance with OSWER Directive 9835.16, the Summaries are designed to rank waste generators and brokers/transporters. Chemclene does not appear to have the financial capability to completely clean up the Site. Nevertheless, EPA considers Chemclene and the Balderstons to be viable PRPs who should participate to the fullest extent possible in Site remediation and funding.

5. **COMMENT:**

When determining PRP liability at the Site, EPA should take into account separate waste-in rankings for the Former Disposal Area ("FDA") and the Main Plant Area ("MPA"), areas of the Site utilized by Chemclene as part of its operations.

**EPA'S RESPONSE:**

Information available to EPA indicates that Chemclene utilized both the FDA and the MPA of the Site as part of Chemclene's operations. At all times during its operation, until approximately July 1992, Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including hazardous substances. All wastes sent to the Site initially went to the MPA. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations.

Chemclene also disposed of wastes, including hazardous substances, at the FDA. Chemclene claims that disposal at the FDA ceased when new management took over the business in approximately August 1975, at which point Chemclene discontinued use of the FDA and disposed of waste generated from the reclamation process off-Site.

Based upon the foregoing information, when preparing the volumetric ranking summaries for the Site, EPA counted all waste transactions between Chemclene and PRPs during the 1968 to August 1975 time period as waste into both the MPA and the FDA. EPA has counted waste transactions occurring after August 1, 1975, between Chemclene and PRPs, only as waste into the MPA.



Each PRP's eligibility for *de minimis* status will be determined by reference to each PRP's percentage using the waste-in information for the MPA, where all waste into the Site was received and processed by Chemclene.

EPA has utilized the separate PRP waste-in rankings for the FDA and MPA in order to determine settlement payments that will be required by *de minimis* PRPs. The Site remedy selected by EPA in its Record of Decision dated November 26, 1997, has provided for distinct remedies for the MPA and FDA. Even though significant aspects of the cleanup of the MPA and the FDA may be combined, EPA believes that costs of the remedy can be allocated between the two areas. EPA has calculated settlement payments required of each eligible *de minimis* PRP by determining separately for the FDA and MPA the remedial and oversight costs associated with each of these areas of the Site, and then calculating each PRP's *de minimis* payment obligation with respect to these disparate costs.

EPA recognizes that PRPs that are not eligible for *de minimis* settlement may wish to allocate liability among themselves for disparate remedies selected for the FDA and MPA.

**6. COMMENT:**

Waste oil wastes should not be counted as waste into the Site.

**EPA'S RESPONSE:**

When preparing the Summaries, EPA assumed that all waste sent to the Site was either processed or stored at the Site. Although parties have stated that Chemclene only brokered waste oil, it is EPA's belief that waste oil sent to the Site was transferred on-Site and bulk stored. Additionally, waste oil components have been found at the Site at both the FDA and MPA. The Site remedy selected by EPA is designed to address solvents and other hazardous substances, including those typically found in waste oil, at the Site. Accordingly, unless a PRP making such a challenge provided EPA with an analysis of the actual waste sent to the Site, indicating that the waste did not contain hazardous substances, the waste was included in the Summaries.

MALVERN TCE CORRESPONDENCE TRACKING SYSTEM  
Comprehensive Mailing List (Alphabetical Order)

PAGE: 1  
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A. Duie Pyle  
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\*\* A I W Frank

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A. Johnson & Company Incorporated  
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\* Accuracy Scientific

A & L Handles  
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Accuracy Scientific  
c/o Accuracy Scientific Instruments  
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- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 2**  
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Acro Labels  
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\*\* Aero Plating

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c/o Obermayer, Rebmann, Maxwell, & Hippel  
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\*\* Agitar, Div. of Air Buensod Incorporated

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Airline Hydraulics Corporation  
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Action Manufacturing Company  
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Airworks  
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\*\* ADEC

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Adelphia Graphic Systems (AGS)  
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Airworks  
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Ted Coyle, Esq.  
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Adelphia Graphic Systems (AGS)  
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Albright Paper & Box Corporation  
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Pottstown, PA 19464

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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MALVERN TCE CORRESPONDENCE TRACKING SYSTEM  
Comprehensive Mailing List (Alphabetical Order)

PAGE: 3  
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ALCOA  
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American Electronics Laboratories  
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Environmental/Safety Engineer  
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ALCOA  
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\*\* Ames Supply

Alfa-Laval Separation Incorporated  
c/o Tetra-Laval  
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Ametek Incorporated  
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Alfa-Laval Separation Incorporated  
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Ametek Incorporated  
c/o Stroock & Stroock & Lavan  
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Allister Manufacturing  
c/o Allstar Manufacturing  
President  
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West Chester, PA 19383

AMF Incorporated  
c/o Minstar Incorporated  
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Amchem  
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AMP Corporation  
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AMP Corporation  
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\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

PAGE: 4  
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Armstrong Cork Company  
c/o Armstrong Worldwide Industries  
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Anchor Darling Company  
Mr. Brian McGarvey, President  
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\* Artco

Anchor Darling Company  
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Asplundh Manufacturing Company  
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Angelo  
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Asplundh Manufacturing Company  
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Antenna Corporation  
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\*\* Aston-Hill Company

Ark Products  
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Athena Controls  
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Armstrong Cork Company  
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Athena Controls  
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\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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\* Auto Pack

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c/o Aydin Computer  
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Beckett Corporation  
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c/o Beemer Precision Company Incorporated  
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Beemer Engineering  
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Bendtru Company  
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\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 6**  
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c/o Aval International  
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Boekel Industries  
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Biddle Instruments Company  
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\* Boyertown Packing Company

Bilgram Gear Company  
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Brandt Corporation  
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\* Bishop Tube Company

Brandt Corporation  
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Bo Peep Cleaners  
President  
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\*\* Brittany's Ltd.

Boeing  
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Brooks Instrument  
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Boeing  
c/o Boeing Company  
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Brooks Instrument  
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\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 7**  
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Brumbaugh Industries  
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Burroughs Corporation  
c/o Unisys Corporation  
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Brumbaugh Industries  
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C.K. Systematics Incorporated  
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Budd Company  
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Bunnell Plastics Incorporated  
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- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 8**  
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\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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MALVERN TCE CORRESPONDENCE TRACKING SYSTEM  
Comprehensive Mailing List (Alphabetical Order)

PAGE: 9  
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Cincinnati Time  
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Mr. Robert Heil, Vice President  
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Concurrent Computer Corporation  
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Classic Coachworks  
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Contamination Control Incorporated  
c/o Microdot Connectors  
Mr. Ernest Hartland, President  
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Coatings For Industry Incorporated  
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Cobra Wire & Cable Company  
Mr. Bart Reitter, President  
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\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

PAGE: 10  
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Cook Specialty Company  
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Danco Tool & Mold Company  
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Data Media Incorporated  
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CSS International Corporation  
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Davey Products  
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c/o Chemetal Foote  
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Davey Products  
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\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 11**  
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Environmental Defense Section  
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Defense Reutilization & Marketing Service  
c/o Eve Wilkerson-Barron, Esq.  
U.S. Department of Justice  
Environmental Defense Section  
601 D Street  
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\*\* Delaware Container Co. Inc.

Defense Reutilization & Marketing Service  
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c/o Eve Wilkerson-Barron, Esq.  
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Environmental Defense Section  
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Washington, DC 20004

Delbar Products  
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Environmental Safety Compliance Engineer  
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Defense Reutilization & Marketing Service  
for DRMO Philadelphia  
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\*\* Delco Wire & Cable, Inc./Delco Elec.

Defense Reutilization & Marketing Service  
for Madison, IN  
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Defense Reutilization & Marketing Service  
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Deltron Incorporated  
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Defense Reutilization & Marketing Service  
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\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 12**  
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Dentronix Incorporated  
C. S. Fisher, Esq.  
Pippack Pike  
Box 203  
Ambler, PA 19002

Diversified Electronic Corporation  
c/o Hale & Schenkman  
Russell Schenkman, Esq.  
13 Roszell Road, Suite 225  
Princeton, NJ 08540

Dettra Flag Company  
Mr. Elmer Bauer, President  
P.O. Box 408  
Oaks, PA 19456

Dixon Industries Corporation  
c/o Environmental Law Practice  
Abbey Eremich, Esq.  
19 Hillside Avenue  
Milford, CT 06460-7806

DeVilbiss Company  
c/o DeVilbiss Healthcare Incorporated  
Mr. Ray Dyre, President  
P.O. Box 635  
Somerset, PA 15501

Dixon Industries Corporation  
c/o Furon Company  
Mr. Jerry Noonan, President  
29982 Ivy Glenn Drive  
Laguna Nigel, CA 92677

DeVilbiss Company  
c/o Procopio, Cory, Hargreaves, & Savitch, LLP  
Robert G. Russell, Jr., Esq.  
1 Street, Suite 2100  
San Diego, CA 92101-4469

Doehler-Jarvis  
Mr. Robert J. Jacobson  
Director of Environmental Control  
P.O. Box 902  
Toledo, OH 43697-0902

Devon Apparel  
c/o Prentice Hall Corporation  
President  
319 Market Street  
Harrisburg, PA 17101

Donn Corporation  
c/o USG Interiors Incorporated  
Virginia Yang, Esq.  
125 South Franklin Street  
Chicago, IL 60608-4678

Display Corporation of America  
c/o TSG Merchandising Incorporated  
Mr. Paul Schmidt, President  
1250 Easton Road, Suite 200  
Horsham, PA 19044

Donn Corporation  
c/o Wilbraham, Lawler, & Buba  
Kim Hollander, Esq.  
The Curtis Center  
601 Walnut Street, Suite 450 W  
Philadelphia, PA 19106-3304

Diversified Electronic Corporation  
Mr. Bernard Shurman, President  
4969 Wakefield Street  
Philadelphia, PA 19144

\*\* Dorado Fabrics

\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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MALVERN ICE CORRESPONDENCE TRACKING SYSTEM  
Comprehensive Mailing List (Alphabetical Order)

PAGE: 13  
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Drexelbrook Engineering  
Mr. Fred Maltby, CEO  
205 Keith Valley Road  
Horsham, PA 19044

E/M Corporation  
c/o West Lafayette Corporation  
Mr. Robert McDonald, President & CEO  
One Great Lakes Boulevard  
West Lafayette, IN 47906

Drexelbrook Engineering  
c/o LeGros Law Partners  
Susan P. LeGros, Esq.  
1000 Westlakes Drive  
Suite 275  
Berwyn, PA 19312

East West Label Company Incorporated  
Mr. Christopher Wilson, President  
P.O. Box 7480  
St. Davids, PA 19087

\* Durawood

Eaton  
c/o Eaton Corporation  
William P. Rudland, Esq.  
Eaton Center  
Cleveland, OH 44114-2584

\*\* Dynamic Services

Eaton  
c/o Eaton Corporation  
Mr. Stephen Hardis, CEO  
Eaton Center  
Cleveland, OH 44114

E. Hopkins Company  
Al Pappas, President  
3427 South Lawrence Street  
Philadelphia, PA 19148

Eaton  
c/o Macko Material Handling Group  
Brad A. DeVore, Esq.  
3330 One First Union Center  
Charlotte, NC 28202

E.I.T. Incorporated  
c/o Enterra Instrumentation Technology  
Mr. Howard Lawrence, President  
P.O. Box 744  
Sunbury, PA 17801

Eaton  
c/o Womble, Carlyle, Sandridge, & Rice  
Lori P. Hinnant, Esq.  
200 West Second Street  
Winston-Salem, NC 27101

E/M Corporation  
c/o West Lafayette Corporation  
Michael D. Scott, Esq.  
One Great Lakes Boulevard  
West Lafayette, IN 47906

Elco Corporation  
c/o Prentice Hall Corporate Systems  
Mr. Benedict Rosen, CEO  
319 Market Street  
Harrisburg, PA 17101

\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

PAGE: 14  
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Eldredge Incorporated  
Robert Eldredge, President  
Fernhill Road  
West Chester, PA 19380

Electronic Display/Hercules  
c/o Hercules Incorporated  
Richard L. Williams, Esq.  
Hercules Plaza  
1313 North Market Street  
Wilmington, DE 19894

Eldredge Incorporated  
c/o Stevens & Lee  
David A. Garrison, Esq.  
One Glenhardie Corporate Center  
1275 Drummers Lane  
P.O. Box 236  
Wayne, PA 19087-0236

Ellisco  
c/o Ellisco Industries  
Mr. Charles Foster, CEO & President  
8901 Yellow Brick Road  
Baltimore, MD 21237

Electro Platers of York Incorporated  
Mr. David Sollenberger, President  
209 East Willow Street  
Wrightsville, PA 17368

Emeco  
c/o Emeco Industries Incorporated  
Mr. Jay Buchbinder, CEO  
805 West Elm Avenue  
Hanover, PA 17331

Electro Platers of York Incorporated  
c/o Griffith, Strickler, Lerman, Solymos, & Calkins  
Robert M. Strickler, Esq.  
South Northern Way  
PA 17402-3737

Emeco  
c/o Griffith, Strickler, Lerman, Solymos, & Caulkins  
Robert M. Strickler, Esq.  
110 South Northern Way  
York, PA 17402-3737

Electro Tech Systems Incorporated  
Mr. Stanley Weitz, CEO  
35 East Glenside Avenue  
Glenside, PA 19038

Empire Abrasive & Equipment Corporation  
Mr. John Gauntt, Controller  
2101 West Cabot Boulevard  
Langhorne, PA 19047-1893

\* Electroloy

EMR Photoelectric  
c/o Schlumberger EMR  
Joseph L. Page, Esq.  
205 Industrial Road  
Sugar Land, TX 77478

Electronic Display/Hercules  
c/o Hercules Incorporated  
President  
Hercules Plaza  
1313 North Market Street  
Wilmington, DE 19894

EMR Photoelectric  
c/o Schlumberger EMR  
Mr. John Hunka, President  
20 Wallace Road  
Princeton Junction, NJ 08550

\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
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**PAGE: 15**  
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Ervins Crafts  
c/o Buchar Horn Incorporated  
Mr. Timothy M. Yohe, PE  
The Industrial Plaza of York  
445 West Philadelphia Street  
P.O. Box 15040  
York, PA 17405-7040

Far East Foods  
Mr. Luke Marano, President  
4950 South Island Road  
Philadelphia, PA 19153

\*\* Ext - Corporol

\*\* Fendt Finding Co., Inc.

F B F Industries Incorporated  
Mr. Edward McAllister, President  
Three Glenhardie Corporate Center  
1265 Drummers Lane, Suite 304  
Wayne, PA 19087-1570

\*Fergusson

Fabric Development  
Mr. Peter Schah, President  
P.O. Box 462  
1217 Mill Street  
Quakertown, PA 18951

Fischer & Porter Company/Andrews Glass Company  
c/o Bailey, Fisher, & Porter Company  
Mr. Jay Tolson, CEO  
125 East County Line Road  
Warminster, PA 18974-4995

Fabric Development  
c/o Liederbach, Hahn, Foy, & Petri  
Dennis P. Denard, Esq.  
892 Second Street, Suite C  
Richboro, PA 18954-1005

Floor Systems Incorporated  
c/o USG Interiors Incorporated  
Virginia Yang, Esq.  
125 South Franklin Street  
Chicago, IL 60608-4678

Fairchild Space Systems  
President/CEO  
c/o Fairchild Industries  
300 West Service Road  
Box 10803  
Chantilly, VA 22021

Floor Systems Incorporated  
c/o Wilbraham, Lawler, & Buba  
Kim Hollander, Esq.  
The Curtis Center  
601 Walnut Street, Suite 450 W  
Philadelphia, PA 19106-3304

Fairfax Cleaners  
c/o Fairfax Valet Cleaners  
Mr. Arthur Kahn, Owner  
3 Fairfax Boulevard  
Wilmington, DE 19803

Fluid Power Incorporated  
Mr. David Albrecht, CEO  
534 Township Line Road  
Blue Bell, PA 19422

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 16**  
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Fluid Power Incorporated  
c/o Kelly, McLaughlin, & Foster  
Thomas McLaughlin, Esq.  
West Germantown Pike, Suite 350  
Plymouth Meeting, PA 19462-1056

FTC Hazardous Incorporated  
c/o Fact Environmental Services  
c/o Hancock Industries  
Mr. Stewart Golen, CEO  
7333 Milnor Street  
Philadelphia, PA 19136

Formation Incorporated  
Mr. Chet Fennell, President  
121 Whittendale Drive  
Moorestown, NJ 08057

G. K. Garrett Corporation  
Mr. Albert H. Voight, President  
2914 North 16th Street  
Philadelphia, PA 19132

Formation Incorporated  
c/o Curton, Caplan, & Clark, P.C.  
William R. Powers, Jr., Esq.  
3000 Midatlantic Drive, Suite 101  
Mt. Laurel, NJ 08054

Gala Industries  
Mr. Alan Chapman, President & CEO  
6800 Westfield Avenue  
Pennsauken, NJ 08110

Formosa Plastics Corporation, Delaware  
c/o Formosa Plastics Corporation, USA  
Michael G. Karlis, Esq.  
1000 Birch Tree Hill Road  
Parsippany, NJ 07039-5702

Gala Industries  
c/o Ballard, Spahr, Andrew, & Ingersoll  
Henry Weiss, Esq.  
1735 Market Street, 51st Floor  
Philadelphia, PA 19103

Franklin Mint  
Howard P. Lucker, Esq.  
Vice President & General Counsel  
Franklin Center  
U.S. Route 1  
Franklin Center, PA 19091

Gas Springs  
c/o Stabilus Gas Spring Company  
Mr. Thomas Blomquist, President  
92 County Line Road  
Colmar, PA 18915-9607

Fraser-Volpe Corporation  
Mr. Joseph Volpe, President  
1025 Thomas Drive  
Warminster, PA 18974

Gateway Terminal  
Mr. John Pontecorro, President  
P.O. Box 179  
Carteret, NJ 07008

Frontier Chemical Waste Process  
President  
P.O. Box 1471  
4626 Royal Avenue  
Niagara Falls, NY 14303

Gateway Terminal  
c/o Herold and Haines  
Anthony J. Reitano, Esq.  
25 Independence Boulevard  
Warren, NJ 07059-6747

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 17**  
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General Electric  
c/o Lockheed Martin Corporation  
Mr. Thomas A. Vandenberg  
Assistant General Counsel  
7921 Southpark Plaza, Suite 210  
Littleton, CO 80120

\*\* Globe Solvents

General Electric  
c/o Lockheed Martin Corporation  
Ms. Eileen Wisser  
Manager, Environment, Health, and Safety  
230 East Mall Boulevard  
King of Prussia, PA 19406

Gould Incorporated  
c/o Gould Electronics Incorporated  
Daniel F. Schranghamer, Esq.  
Obermayer, Rebmann, Maxwell, & Hippel, LLP  
One Penn Center- 19th Floor  
1617 John F. Kennedy Boulevard  
Philadelphia, PA 19103-1895

General Electric  
c/o Lockheed Martin Missiles and Space  
Mr. Mark Posson  
Manager Environmental Protection Program  
ORGN. 47-10, Building 101  
1111 Lockheed Martin Way  
Sunnyvale, CA 94089

Gould Incorporated  
c/o Gould Electronics Incorporated  
Michael Veysey, Esq.  
34929 Curtis Boulevard  
Eastlake, Ohio 44095

General Motors Corporation  
Ms. Linda L. Bentley  
3044 West Grand Boulevard  
Mail Code 482 112 149  
Detroit, MI 48202

Graphic Packaging Corporation  
Mr. Thomas Warlick  
Corporate Environmental Manager  
350 Griggs Road  
Clover, SC 29710

Giles & Ransome  
Mr. Michael D. Barnasevitch  
Risk Management Coordinator  
2975 Galloway Road  
Bensalem, PA 19020

Green Tweed Company  
Mr. Henry Delfiner, CEO  
2075 Detwiler Road  
Kulpsville, PA 19433

\*\* Giltech, Inc.

Green Tweed Company  
c/o Blank, Rome, Comisky, & McCauley  
Joseph J. McGovern, Esq.  
Four Penn Center Plaza  
Philadelphia, PA 19103-2599

Glah Brothers Incorporated  
c/o Formal Affairs Incorporated  
President  
41 South York Road  
Hatboro, PA 19040

Gulf & Western  
c/o Viacom International Incorporated  
Mr. Suner Redtone, CEO  
1515 Broadway  
New York, NY 10036

\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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\* L Cleaners

Hamilton Watch Company  
Mr. James Marsh, President  
941 Wetland Avenue  
Lancaster, PA 17603

H-V Industries Incorporated  
c/o Crown Cork & Seal Company Incorporated  
William T. Gallagher, Esq.  
P.O. Box 6208  
9300 Ashton Road  
Philadelphia, PA 19136

Hamilton Watch Company  
c/o Hecker, Brown, Sherry, & Johnson  
Butler Buchanan, III, Esq.  
1700 Two Logan Square  
18th & Arch Streets  
Philadelphia, PA 19103-2769

\*\* Hahn Truck Sales

Hamilton Watch Company  
c/o SMH (US) Incorporated  
Neil Gordon, Esq.  
Corporate Counsel  
1200 Harbor Boulevard  
Weehawken, NJ 07087

Hale Pumps Incorporated  
c/o Hale Products  
Mr. Wade Roberts, President  
Spring Mill Avenue  
Johnstown, PA 19428

Handy & Harman Tube Company Incorporated  
c/o Handy & Harman  
Mr. Dave Kelley  
Director of Environmental Safety  
231 East Ferris Avenue  
East Providence, RI 02916

Hamilton Precision Metals  
c/o Holleb & Coff  
Melissa A. Manuel, Esq.  
55 East Monroe Street  
Chicago, IL 60603-5896

Heel Company  
William H. Nehr Korn II, Esq.  
P.O. Box 8676  
Chattanooga, TN 37414

Hamilton Precision Metals  
c/o Katy Industries Incorporated  
Richard Burnett  
Environmental Affairs  
6300 South Syracuse Way, Suite 300  
Englewood, CO 80111-6723

Heel Company  
c/o Walther Law Offices  
William H. Nehr Korn II, Esq.  
222 East Mason Street  
Milwaukee, WI 53202-3602

Hamilton Technology Incorporated  
c/o Bulova Technologies Incorporated  
Craig Schnee, Esq.  
Vice President & General Counsel  
101 North Queen Street  
Lancaster, PA 17604-4787

Herman Goldner Company Incorporated  
Ms. Emma L. Anello  
Administrator  
7777 Brewster Avenue  
Philadelphia, PA 19153

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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MALVERN TCE CORRESPONDENCE TRACKING SYSTEM  
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HI Services  
c/o HI Scientific Services Incorporated  
President  
1035 West Lincoln Highway  
Coatesville, PA 19320

\* Hurst Performance

High Energy Company  
Mr. Dick Robbins, President  
Lower Valley Road  
Parkesburg, PA 19365

Imperial Specialty  
Ms. Portia Kirkpatrick, President  
P.O. Box 635  
Pottstown, PA 19464

High Energy Company  
c/o Inductotherm Industries Incorporated  
Walter W. Leach III, Esq.  
10 Indel Avenue  
P.O. Box 157  
Rancocas, NJ 08073-0157

Imperial Specialty  
c/o White & Williams LLP  
Timothy J. Szuhj, Esq.  
1800 One Liberty Place  
Philadelphia, PA 19103

Hollingsworth  
c/o John R. Hollingsworth Company  
Mr. Ray E. White Jr., Secretary  
218 Westridge Gardens  
Phoenixville, PA 19460

\*\* Industrial Systems Design

Honeywell Instruments  
Ms. Roberta B. Olsen  
Honeywell Plaza  
P.O. Box 524  
Minneapolis, MN 55440-0524

\*\* Inland Pumping & Dredging

Hough/Loew Associates  
Mr. Jack Loew, President  
750 Springdale Drive  
Exton, PA 19341

Iron Bound Heat Treating Company  
Mr. John Ross, President  
304 Cox Street  
Roselle, NJ 07203

Hulltronics  
c/o Hull Corporation  
President  
Davisville Road  
Hatboro, PA 19040

Iron Bound Heat Treating Company  
c/o Buttermore, Mullen, Jeremiah, & Phillips  
William S. Jeremiah, Esq.  
445 East Broad Street  
P.O. Box 2189  
Westfield, NJ 07091-2189

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 20**  
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J & J Spill  
Philip Ettinger, President  
Felton Road  
Norristown, PA 19403

John Evans & Sons Incorporated  
Mr. G. D. Bennett, President  
P.O. Box 885  
Spring Avenue  
Lansdale, PA 19446

J & J Spill  
c/o Hughes & Kalkbrenner, LLP  
George Ozorowski, Esq.  
621 Commons, Suite 205  
621 East Germantown Pike  
Norristown, PA 19401-2454

Johnson Company  
Mr. George Stoltsteimer, President  
1765 Woodhaven Drive  
Bensalem, PA 19020

J. W. Rex Company  
John W. Rex, President  
8th Street & Valley Forge Road  
Lansdale, PA 19446

Johnson Mathey  
Mr. Frank J. Opet  
Vice President, Health, Safety, & Environmental Affairs  
2001 Nolte Drive  
West Deptford, NJ 08096

James Spring & Wire Company  
Mr. Timothy Morris, General Manager  
6 North Bacton Hill Road  
Norristown, PA 19355

\*\* K S O Industries

James Spring & Wire Company  
c/o Drinker, Biddle, & Reath, LLP  
Andrew Foster, Esq.  
Philadelphia National Bank Building  
1345 Chestnut Street  
Philadelphia, PA 19107-3496

K-D Tool Manufacturing  
c/o Robert H. Devenney-VP Finance/Administration  
Dahaher Tool Group-Professional Tool Division  
805 Estelle Drive  
P.O. Box 3767  
Lancaster, PA 17604-3767

Jenson, Homer  
Cederbrook Hill Apartments A824  
8460 Limekin Pike  
Wyncote, PA 19095

Kawecki Beryco  
c/o Cabot Company  
Mr. Gene Lillie, President  
157 Concord Road  
Billerica, MA 01821

Jetshapes Incorporated  
c/o Interlake ARD Corporation  
President  
550 Warrenville Road  
Lisle, IL 60532-4387

Kawecki Beryco  
c/o Morgan, Lewis & Bockius LLP  
Frank Thomas, Esq.  
2000 One Logan Square  
Philadelphia, PA 19103-6993

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 21**  
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Kawneer Corporation  
Mr. Daniel Good, President  
555 Guthridge Avenue  
Norcross, GA 30092

Krautkramer-Branson Incorporated  
c/o Shaw, Pitman, Potts, & Trowbridge  
Jennifer Giblin, Esq.  
2300 N Street, NW  
Washington, DC 20037

Keystone Block Transportation Company  
c/o Keystone Environmental Services  
Mr. Ellis Block, President  
1100 South Pottsville Pike  
Shoemakersville, PA 19555

KSM Fastening Systems Incorporated  
c/o Blount International Incorporated  
Richard H. Irving III, Esq.  
4520 Executive Park Drive  
Montgomery, AL 36116-1602

Keystone Transformer  
Mr. Johnny Fox, President  
110 Pottstown Avenue  
Pennsburg, PA 18073

Kulicke & Soffa  
Mr. Scott Kulicke, President  
2101 Blair Mill Road  
Willow Grove, PA 19090

Kim Manufacturing  
Mr. Thomas Keily, President  
P.O. Box 405  
Downingtown, PA 19335-0405

Kulicke & Soffa  
c/o Drinker, Biddle, & Reath, LLP  
Andrew Foster, Esq.  
Philadelphia National Bank Building  
1345 Chestnut Street  
Philadelphia, PA 19107-3496

Kim Manufacturing  
c/o LeGros Law Partners  
Susan P. LeGros, Esq.  
1000 Westlakes Drive, Suite 275  
Berwyn, PA 19312

L & S Tool & Machine Company  
Mr. Terry Livingstone, President  
140 Derry Court  
York, PA 17402

\* Kosempel

LaFrance Corporation  
Mr. William Poesz, President  
8425 Executive Avenue  
Philadelphia, PA 19353

Krautkramer-Branson Incorporated  
c/o Emerson Electric  
Mr. Charles Knight, General Manager  
8000 West Florissant Avenue  
St. Louis, MO 63136

Laminators Incorporated  
Mr. J. David Thompson, President  
3195 Penn Avenue  
Hatfield, PA 19440

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
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Laminators Incorporated  
c/o Stradley, Ronon, Stevens, & Young, LLP  
Robert F. Hecht, Esq.  
One Commerce Square  
Philadelphia, PA 19103-7098

Lincoln  
c/o Pentair Corporation  
Mr. Winslow Buxton, President  
1500 County Road  
B2 West, Floor 4  
Saint Paul, MN 55113

Lancaster Machinery  
Mrs. Doris Cohen  
835 Glenwood Drive  
York, PA 17403

London Harness & Cable Company  
Mr. Mark Greene, President  
330 Pennington Avenue  
Trenton, NJ 08618

Lancaster Machinery  
c/o PDS Paint Incorporated  
President  
717 Fountain Avenue  
Lancaster, PA 17601

\* Lovekin Corporation

Lavelle Aircraft Company  
Mr. Albert Bailey, President  
275 Geiger Road  
Philadelphia, PA 19115

\*\* Lowry's

Lavelle Aircraft Company  
c/o Spector, Gadon, & Orden  
Leslie Baskin, Esq.  
Seven Penn Center  
1635 Market Street  
Philadelphia, PA 19103

M Q S Inspection Incorporated/Magnaflex  
Mr. Ronald Reinhold  
Vice President of Operations  
2301 Arthur Avenue  
Elk Grove Village, IL 60007

Leeds & Northrop Company  
c/o General Signal Corporation  
President  
One High Ridge Park  
P.O. Box 10010  
Stamford, CT 06904-2010

Mack Electric  
Mr. Ken McKinney, President  
1 North Avenue  
Wyncote, PA 19095

Lightman Drum Company  
President  
P.O. Box 22  
Berlin, NJ 08018

\*\* Mack Wayne Plastics

\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

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Malco  
c/o Greenberger & Forman  
Robert W. Forman, Esq.  
1370 Avenue of Americas  
New York, NY 10019-4602

Matthew International  
Manager of Environmental Health & Safety  
Two Northshore Center  
Pittsburgh, PA 15212-5851

Malco  
c/o Microdot Connectors Incorporated  
Mr. Ernest Heartland, President  
306 Pasadena Avenue  
South Pasadena, CA 91030

McClarin Plastics  
Mr. Todd Kennedy, President  
600 Linden Avenue  
Hanover, PA 17331

\* Manographics

McGee Industries Incorporated  
c/o McLube Division  
Mr. James D. Brady, Technical Director  
P.O. Box 2425  
9 Crozerville Road  
Aston, PA 19014

Mars Electronics Incorporated  
c/o Mars Electronics International  
Mr. Bruce Beadle, Manager of Logistics  
1301 Wilson Drive  
West Chester, PA 19380

McHugh Railroad Maintenance Equipment Company  
Mr. James McHugh Jr., CEO  
225 Lincoln Highway  
Fairless Hills, PA 19030

Mars Money Systems  
c/o Mars Electronics International  
Mr. Bruce Beadle, Manager of Logistics  
1301 Wilson Drive  
West Chester, PA 19380

Meade Packaging  
Stephen V. Moser, Esq.  
Courthouse Plaza NE  
Dayton, OH 45463

Materials Electronic Products  
c/o MELCOR  
Mr. Sal Giordano, President  
1040 Spruce Street  
Trenton, NJ 08648

Meade Packaging  
Mr. Samuel Benedict, President  
10 West 2nd  
Dayton, OH 45463

Matheson Instrument  
Mr. Donald Rumiow, President  
30 Seaview Drive  
Secaucus, NJ 07094

Met-Fin  
Mr. Gary Lukens, President  
P.O. Box 1127  
4th Street  
North Wales, PA 19454

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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MALVERN TCE CORRESPONDENCE TRACKING SYSTEM  
Comprehensive Mailing List (Alphabetical Order)

PAGE: 24  
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Mida Development  
Edward T. Mida, President  
Box 3529  
Hampton, VA 23663

Morning Call  
c/o Times Mirror Company  
Mr. Mark Willis, President  
Times Mirror Square  
Los Angeles, CA 90053

\*\* Mida Manufacturing

N W Controls  
Mr. Henry Schontz, President  
P.O. Box 325  
Harleysville, PA 19438

\*\* Mitchell Specialty

N W Controls  
c/o Duane, Morris, & Heckscher  
David C. Toomey, Esq.  
One Liberty Place  
Philadelphia, PA 19103-7396

Model Finishing  
c/o Hazardous Materials Management Team  
Mr. Bruce W. Stevens, PE  
Box 1066  
Down, PA 18940

Napp Chemical  
Mr. Hans Kirchgaessner, President  
P.O. Box 893  
299 Market Street  
Saddlebrook, NJ 07663

\* Monitor Systems

Napp Chemical  
c/o Lowenstein, Sandler, Kohl, Fisher, & Boylan  
Michael Dore, Esq.  
65 Livingston Avenue  
Roseland, NJ 07068-1791

Moore Products  
Mr. William Moore, President  
Sumneytown Pike  
Spring House, PA 19477

Narco Avionics  
c/o Telonic Berkeley  
Mr. Steve Hilbert, Vice President  
270 Commerce Way  
Fort Washington, PA 19034

Moore Products  
c/o Drinker, Biddle, & Reath, LLP  
Andrew Foster, Esq.  
Philadelphia National Bank Building  
1345 Chestnut Street  
Philadelphia, PA 19107-3496

National Computer Systems (NCS)  
Steven A. Wells, Esq.  
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P.O. Box 9365  
Minneapolis, MN 55440

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 25**  
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National Computer Systems (NCS)  
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NGK Metals  
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National Metal Crafters  
Mr. James Redd, President  
1405 East Oxford Street  
Philadelphia, PA 19125

Ni-Chro  
c/o Ni-Chro Finishing  
Mr. William Weidemeyer, CEO  
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Perkasie, PA 18944

National Products  
c/o Finova Capital Corporation  
Mr. Paul Lloyd, President  
111 West 40th Street  
New York, NY 10018

Norco Finishing  
President  
238 Root Avenue  
Pottstown, PA 19465

\*\* National Solvents Inc.

Norco Finishing  
Terry Knox, Esq.  
c/o MacEfree Harvey  
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Spring City, PA 19475-0259

Netzsch Incorporated  
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North Industrial Chemicals  
Mr. William N. Fay, Vice President  
609 East King Street  
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York, PA 17403

Neutronics  
President  
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Exton, PA 19406

North Penn Polishing & Plating  
Mr. David Otto, President  
P.O. Box 370  
40 West Park Avenue  
Sellersville, PA 18960

NGK Metals  
Ms. Lynne Woodside  
Supervisor, Environmental Affairs  
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North Penn Polishing & Plating  
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\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

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MALVERN TCE CORRESPONDENCE TRACKING SYSTEM  
Comprehensive Mailing List (Alphabetical Order)

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Olympic Tool & Machine Company  
\*\* Umberto Zavaleta, President  
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PA 19014

Penflex Incorporated  
c/o Duane, Morris, & Heckscher  
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Olympic Tool & Machine Company  
c/o Paul, Mardinly, Durham, James, Flandreau, & Rodger  
Bruce E. Rodger, Esq.  
320 West Front Street, Box D  
Media, PA 19063

Penguin Industries  
Mr. Robert McNeil, President  
Airport Industrial Mall  
Coatesville, PA 19320

Oxford Metal Products  
c/o Al Feldman  
Penns Landing Square  
130 Spruce Street, Unit 34A  
Philadelphia, PA 19106

Penguin Industries  
c/o Riley, Riper, Hollin, & Colagreco  
Chris Luning, Esq.  
240 Daylesford Plaza  
P.O. Box 568  
Paoli, PA 19301

P P & L Northern Division S.C.  
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Penn Airborne Products  
c/o Transacoil Incorporated  
Mr. Robert Carlson, President  
P.O. Box 9011  
Valley Forge, PA 19485

P P & L Northern Division S.C.  
c/o P P & L Resources  
Mr. William Hecht, CEO  
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Penn Dye & Finishing  
c/o Gold Mills Incorporated  
Mr. Nathaniel Weisler, CEO  
137 Tulpehocken Street  
Pine Grove, PA 19485

Paris Business Forms  
c/o Paris Business Products  
President  
122 Kissel Road  
Burlington, NJ 08016

\*\* Pennsbury Manufacturing

Penflex Incorporated  
Ms. Carol Barker, President  
271 Lancaster Avenue  
Frazer, PA 19355

Pennwalt Corporation  
c/o Alfa-Laval  
Mr. Bernard Azoulay, CEO  
955 Mearns Road  
Warminster, PA 18974

\* Address investigation currently being conducted.  
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MALVERN TCE CORRESPONDENCE TRACKING SYSTEM  
Comprehensive Mailing List (Alphabetical Order)

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Pennwalt Corporation  
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Maria Villa, Esq.  
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Albany, NY 12260

Permutit  
c/o Sybron International Corporation  
Peter R. Reckmeyer, Esq.  
Corporate Counsel  
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Milwaukee, WI 53202

\* Penske V.D.A.

Permutit  
c/o Zurn Industries  
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Pepco Manufacturing Company  
Mr. John Kennedy, CEO  
210 Evergreen Avenue  
Somerdale, NJ 08083-0160

Permutit  
c/o Zurn Industries  
Mark Wientrab, Esq.  
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Peripheral Dynamics  
c/o Inductotherm Industries  
Walter W. Leach III, Esq.  
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Rancocas, NJ 08073-0157

Peter Paul Cadbury Company  
c/o Dr. Pepper/Seven-Up Incorporated  
c/o Cummings & Lockwood  
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Hartford, CT 06103-3495

Peripheral Dynamics  
c/o Inductotherm Industries  
Mr. John Dobson, President  
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Peter Paul Cadbury Company  
c/o Motts Incorporated  
James L. Baldwin, Jr., Esq.  
Vice President of Legal Affairs  
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Perkin-Elmer  
Mr. Tony L. White, President  
761 Main Avenue  
Norwalk, CT 06859-0001

Petrocon  
c/o Safety Kleen  
President  
1000 Randall Road  
Elgin, IL 60103

Permutit  
c/o Sybron International Corporation  
c/o Fried, Frank, Harris, Shriver, & Jacobson  
1 New York Plaza  
New York, NY 10004

Petter Engraving Incorporated  
c/o Petter Company  
David J. Petters  
1361 Lincoln Heights Avenue  
Ephrata, PA 17522

\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 28**  
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Philadelphia Electric Company Oregon Maintenance Shop  
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Box 8699  
Philadelphia, PA 19101-8699

PHL Incorporated  
Mr. Richard H. McNutt, Engineer  
3859 Old Easton Road  
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Philadelphia Rust Proof Company Incorporated  
Mr. Thomas Vezzosi, President  
2086 East Willard Street  
Philadelphia, PA 19134

Photofabrication Chem. & Equip.  
President  
522 Lancaster Avenue  
Malvern, PA 19355

Philadelphia Steel Drum Company Incorporated  
Mr. Lee Piekutoski, CEO  
8 Woodside Drive  
Richboro, PA 18954-1802

Photolastic Incorporated  
c/o Nixon, Hargrave, Devans, & Doyle, LLP  
Jean H. McCreary, Esq.  
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Rochester, NY 14603

\* Philco Ford

Photolastic Incorporated  
c/o Vishay Intertechnology Incorporated  
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Phillips & Jacob  
Mr. Mike Borne, President  
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Pitman Corporation  
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Harleysville, PA 19438

Phillips & Jacob  
c/o Delany & O'Brien  
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Pitman Corporation  
c/o Duane, Morris, & Heckscher  
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Phillips & Jacob  
c/o Prime Source Corporation  
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Plate Crafters Incorporated  
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230 Bethlehem Pike  
Colmar, PA 18915

\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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MALVERN TCE CORRESPONDENCE TRACKING SYSTEM  
Comprehensive Mailing List (Alphabetical Order)

PAGE: 29  
11/30/98

Plymouth Tube  
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Porter Instruments  
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Plymouth Tube  
c/o Jones & Lemon  
Stephen J. Lemon, Esq.  
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Geneva, IL 60134-0805

PQ Corporation  
Michael N. Becci, Esq.  
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Valley Forge, PA 19482-0840

Pocono Foundry Incorporated  
President/CEO  
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Precision Arts Manufacturing  
Mr. Al Musso, Owner  
200 West Somerdale Road  
Voorhees, NJ 08043

Polysciences  
Mr. Michael Ott, President  
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Warrington, PA 18976

Princo Instruments Incorporated  
Mr. Gilbert Pfaff, President  
1020 Industrial Highway  
Southampton, PA 18966

Polysciences  
c/o Harris & Harris  
Stephen B. Harris, Esq.  
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Warrington, PA 18976

Princo Instruments Incorporated  
c/o Schubert, Bellwoar, Mallon, & Walheim  
Harry J. Bellwoar III, Esq.  
Two Penn Center, Suite 1400  
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Philadelphia, PA 19102-1890

\*\* Ponderosa Disposal Co.

Prodelin Incorporated  
Mr. Kuo Huang  
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Porter Instruments  
Mr. G.K. Porter, President  
245 Township Line Road  
Hatfield, PA 19440

Pyco Incorporated  
Mr. John Metzger Jr., President  
600 East Lincoln Highway  
Pennel, PA 19047

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
**Comprehensive Mailing List (Alphabetical Order)**

**PAGE: 30**  
**11/30/98**

Pyco Incorporated  
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West Chester Pike  
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RC Kletzing  
Mr. Arthur Greisiger, President  
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Quaker City Chemicals  
Kitteredge, Donley, Elson, Fullem, & Embrick, LLP  
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RCA  
c/o General Electric  
Kirk McFarlane, Esq.  
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Quaker City Chemicals  
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RDL Incorporated  
Mr. Joe DiBona, President  
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R & E Martin Incorporated  
Mr. Richard Martin II, CEO  
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RDL Incorporated  
c/o Fox, Differ, Callahan, Sheridan, & McDevitt  
Michael J. Sheridan, Esq.  
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R & E Martin Incorporated  
c/o Law Offices of Kevin Kologinsky  
Thomas J. Bogar, Esq.  
7151 Frankford Avenue, Suite 301  
Philadelphia, PA 19135

Reilly Plating  
Mr. Joseph Reilly, President  
130 Alden Road  
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R.R. Donnelley & Sons Incorporated  
Mr. John Walter, Chairman  
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Reilly Plating  
c/o Drinker, Biddle, & Reath, LLP  
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Philadelphia, PA 19107-3496

R.R. Donnelley & Sons Incorporated  
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Natalie Walsh, Esq.  
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4th Floor  
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\*\* Repco

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 31**  
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Resource Technology Services Incorporated  
c/o RMI Environmental Incorporated  
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Sanivan Labs  
President  
5129 F Street  
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Reynolds Cleaners  
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Schmidt Brewery Company  
President  
P.O. Box 25013  
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Reynolds Metals  
Mr. Jeremiah Sheehan, President  
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Schramm Incorporated  
Mr. Richard Schramm, President  
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Reynolds Metals  
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\* Scotco Design Group Incorporated

\*\* Richard Hurst

Scott Paper Corporation  
c/o Kimberly Clark Corporation  
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Sandvik Incorporated  
Mr. Edward Nuzzaci, President  
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\* Sermetel

Sandvik Incorporated  
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\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
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SGL  
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Arthur Blumenthal, President  
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Simco Company Incorporated  
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Shared Medical Systems (SMS)  
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Simon Wrecking Company Incorporated  
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Sharples Incorporated  
c/o Alfa-Laval  
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Simon Wrecking Company Incorporated  
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Sharples Incorporated  
c/o Whiteman, Osterman, & Hanna  
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Simon Wrecking Company Incorporated  
c/o Simon Resources Incorporated  
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Shur-Kut Supply Corporation  
Mr. Joe Saddic, President  
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\*\* Simonetta Brothers

Sikkens Company  
c/o Akzo Nobel Coatings Incorporated  
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Louisville, KY 40209

\*\* Simpson Sign Co.

Silvine  
Mr. Harry Silver, President  
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Abington, PA 19001

\* Singer Company

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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SKF Industries Incorporated  
c/o SKF USA Incorporated  
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SPD Technologies  
c/o Obermayer, Rebmann, Maxwell, & Hippel  
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Solar Atmospheres  
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Specialty Castings Incorporated  
Mr. John Cowgill, President  
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Solar Atmospheres  
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Specialty Castings Incorporated  
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\*\* Solatario

Specialty Glass Products  
Mr. Frank Arrison, President  
2885 Terwood Road  
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Solid State Scientific  
President  
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Sperry Univac  
c/o Unisys Corporation  
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Environmental Health & Safety  
Township Line & Union Meeting Roads  
Blue Bell, PA 19424-0001

Sonic Instruments  
f/k/a Staveley New Jersey  
c/o The Prentis-Hall Corporate Systems  
President  
84 State Street  
Boston, MA 02109

Spra-Fin Incorporated  
President  
177 Wissahickon Avenue  
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SPD Technologies  
Mr. Larry Colangelo, President  
13500 Roosevelt Boulevard  
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Sprague - Griffiths Division  
c/o Textron  
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Providence, RI 02903

\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

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SPS Technologies  
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Sunroc Corporation  
Mr. Anthony Salamone, President  
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Star Dental Corporation  
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Superior Metal Products  
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Star Dental Corporation  
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c/o Heller Ehrman White & McAuliff  
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Superior Tube  
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3900 Germantown Pike  
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Collegeville, PA 19426

Stein Seal Company  
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Environmental Coordinator  
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Sweda/Hugin Group  
c/o Litton Industries Incorporated  
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Sterling Fleishman Company  
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Sweda/Hugin Group  
c/o SWI Liquidating Corporation  
President  
250 Welsh Pool Road  
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Storm Weather Products  
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Sweda/Litton  
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1725 Jefferson Davis Highway, Suite 601  
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- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

**PAGE: 35**  
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Syntex Dental Corporation  
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Technical Products  
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Syntex Dental Corporation  
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Mr. Carl Bretko, President  
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Valley Forge, PA 19482

Technical Products  
Mr. William A. Edmunds, President  
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Hatfield, PA 19440

Syntex Dental Corporation  
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c/o Heller Ehrman White & McAuliffe  
Charles M. Hungerford, Esq.  
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\* Technitrol

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\* Tele Dynamics

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Telegenix Incorporated  
c/o Inductotherm Industries Incorporated  
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Techalloy Incorporated  
c/o Rahns Specialty Metals  
Daniel Rico  
Vice President & Chief Operations Officer  
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Thermoseal Glass Corporation  
President  
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Techalloy Incorporated (Rahns Specialty Metals)  
c/o Drinker, Biddle, & Reath, LLP  
Andrew Foster, Esq.  
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Thermoseal Glass Corporation  
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- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
Comprehensive Mailing List (Alphabetical Order)

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Thomson Engineering Company  
dent  
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TRW Incorporated  
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Scott D. Blackhurst, Esq.  
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Transducer Systems Incorporated  
c/o Xensor Company  
Dr. Mario Rafalin, President  
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Tube Methods  
President  
Rambo & Depot Streets  
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Trend Instruments Incorporated  
Mr. Robert Trenner, President  
887 South Matlock Street  
West Chester, PA 19382

Tudor Tech Incorporated  
c/o Inductotherm Industries Incorporated  
Mr. Edward R. Stroik, Chairman  
78 Twist Drive  
Holland, PA 18966

Trend Instruments Incorporated  
c/o Owens, D'Amrosio, & Nescio  
Joseph S. Nescio, Esq.  
uth Church Street  
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Tudor Tech Incorporated  
c/o Inductotherm Industries Incorporated  
James J. Himsworth, Esq.  
Materson, Braunfeld, Himsworth, & Maguire  
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Troemner, Henry  
c/o Duane, Morris, & Heckscher  
David C. Toomey, Esq.  
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Philadelphia, PA 19103-7396

\*\* U S Electronic Services Corp.

Troemner, Henry  
c/o Troemner Incorporated  
Mr. Wilber Abele, President  
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\* U.S. Environmental Services Incorporated

TRW Incorporated  
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\*\* United Chem - Con Corp.

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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MALVERN TCE CORRESPONDENCE TRACKING SYSTEM  
Comprehensive Mailing List (Alphabetical Order)

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Victualic Company of America  
Mr. George Nauman, CEO  
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Exton, PA 18044-0031

USA Ardec  
Mr. Mark Wells, Environmental Affairs  
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Picatinny Arsenal  
Dover, NJ 07806

Vishay Resistive Systems  
Mr. Donald M. Clark  
Environmental Affairs  
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USG Interiors  
c/o USG Interiors Incorporated  
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Vishay Resistive Systems  
c/o Nixon, Hargrave, Devans, & Doyle, LLP  
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P.O. Box 1051  
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USG Interiors Incorporated  
c/o Wilbraham, Lawler, & Buba  
Kim Hollander, Esq.  
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Viz Manufacturing  
Mr. Victor Zelov, President  
335 East Price Street  
Philadelphia, PA 19144

Valley Forge Laboratories Incorporated  
President  
6 Berkeley Road  
Devon, PA 19333

Viz Manufacturing  
c/o Duane, Morris, & Heckscher  
Seth Cooley, Esq.  
One Liberty Place  
Philadelphia, PA 19103-7396

Valley Forge Tape & Label Company  
Mr. Paul Myers, President  
Whiteland Business Park  
119 Summit Drive  
Exton, PA 19341-2889

\* Waste Consulting & Brokerage

Victualic Company of America  
Brian P. Bissey, Esq.  
P.O. Box 31  
Exton, PA 18044-0031

Waste Conversion  
c/o Republic Environmental Systems Incorporated  
Mr. Michael D. Logan  
2337 North Penn Road  
Hatfield, PA 19440

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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MALVERN TCE CORRESPONDENCE TRACKING SYSTEM  
Comprehensive Mailing List (Alphabetical Order)

PAGE: 38  
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Waste Conversion  
c/o Republic Environmental Systems Incorporated  
Gallard, Spahr, Andrew, & Ingersoll  
Weiss, Esq.  
5 Market Street, 51st Floor  
Philadelphia, PA 19103

Western Electric  
c/o Lucent Technologies  
c/o Sidney & Austin  
Sam I. Gutter, Esq.  
1722 I Street NW  
Washington, DC 20026

\*\* Wave Energy Systems

Westinghouse  
Mr. Gary Clark, President  
11 Stanwix Street  
Pittsburgh, PA 15222

Welding Company  
President  
P.O. Box 226  
Ardmore, PA 19003

Westinghouse  
Roger E. Willis Jr., Esq.  
11 Stanwix Street  
Pittsburgh, PA 15222

Welex Incorporated  
Mr. Hermann Durst  
Vice President, Finance  
'olly Road  
Jell, PA 19422

\*\* Wilkinson Industries

Westcode Incorporated  
Mr. Edward Widowsin, President  
14 Lee Boulevard  
Malvern, PA 19355

Wittronics  
President  
RD #2, Box 26  
Centre Hall, PA 16828

Westcode Incorporated  
c/o BTR  
Kevin R. Condon, Esq.  
333 Ludlow Street  
Stamford, CT 06902

Woodstream Corporation  
c/o Ecko Group Incorporated  
Linda R. Millman, Associate General Counsel  
98 Spit Brook Road, Suite 102  
Nashua, NH 03062

Western Electric  
c/o Lucent Technologies  
Ms. Margot E. Glockner  
131 Morristown Road, Room B2148  
Basking Ridge, NJ 07920

\* Xyantech Incorporated

- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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Yuasa-Exide Battery Corporation  
Mr. Om P. Chopra  
Director, Environmental Resources  
2400 Bennville Road  
Reading, PA 19605

\* Zenith Products Corporation

Zenith Products Corporation  
Ms. Kim Day, President  
200 Commerce Drive  
Aston, PA 19014

\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

**AR000178**



**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
List of De Minimis Parties' (Alphabetical Order)

PAGE: 1  
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I W Frank

Acro Labels  
Mr. Bob Reagan, President  
2531 Wyandotte Road  
Willow Grove, PA 19090

A & J Screw Machine Products  
Mr. Joseph A. Harmer  
32 Hamilton Street  
P.O. Box 278  
Chalfont, PA 18914-2804

\*\* ADEC

A & J Screw Machine Products  
Mr. Joseph A. Harmer  
24 Hillside Avenue  
Chalfont, PA 18914-2804

Adelphia Graphic Systems (AGS)  
Ms. Paula Inforzato, Vice President  
302 Commerce Drive  
Exton, PA 19341

A. Johnson & Company Incorporated  
ident  
Welsh Pool Road  
Lunville, PA 19353

\*\* Aero Plating

A & L Handles  
Mr. Philip K. Stonier, Vice President  
244 Shoemaker Road  
Pottstown, PA 19464

\*\* Agitar, Div. of Air Buensod Incorporated

Accumetrics  
Mr. Paul Pitcher, President  
134 Adams Street  
Royersford, PA 19468

Airline Hydraulics Corporation  
Mr. Joseph Laughran, President  
I-95 & Street Road  
Bensalem, PA 19020

\* Accuracy Scientific

Airworks  
c/o General Electric  
Kirk R. McFarlane, Esq.  
640 Freedom Business Center  
King of Prussia, PA 19406

- \* Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
List of De Minimis Parties<sup>1</sup> (Alphabetical Order)

**PAGE: 2**  
**11/30/98**

Airworks  
c/o UNC Airworks  
Ted Coyle, Esq.  
101 East Orden Boulevard  
Millville, NJ 08332

AMF Incorporated  
c/o Minstar Incorporated  
Ms. Mary McConnell, Vice President  
100 South 5th Street, Suite 2400  
Minneapolis, MN 55452

Alfa-Laval Separation Incorporated  
c/o Tetra-Laval  
Mr. Quinton Jackson, President  
9201 Wilnot Road  
P.O. Box 840  
Kenosha, WI 53141

AMP Corporation  
Mr. William Hudson, President  
P.O. Box 3608  
Harrisburg, PA 17105

Allister Manufacturing  
c/o Allstar Manufacturing  
President  
311 Willowbrook Lane  
West Chester, PA 19383

Amuneal Manufacturing Company  
Mr. Larry Maltin, President  
4737 Darrah Street  
Philadelphia, PA 19124-2705

Amchem  
c/o Henkel Corporation  
Ken Arnold, Esq.  
49 Valley Drive  
Furlong, PA 18925

Anchor Darling Company  
Mr. Brian McGarvey, President  
7 East Wynnewood Road  
Wynnewood, PA 19096

American Electronics Laboratories  
c/o AEL Industries  
Patrick S. Till  
Environmental/Safety Engineer  
305 Richardson Road  
Lansdale, PA 19446-1485

Angelo  
c/o Angelo Brothers Company  
Barton A. Pasternak, Esq.  
Vice President & General Counsel  
12401 McNulty Road  
Philadelphia, PA 19154-1099

\*\* Ames Supply

Ark Products  
Mr. Ronald A. King  
Vice President  
3320 Willow Street Pike South  
Willow Street, PA 17584

Ametek Incorporated  
Mr. Thomas A. Deeney  
Director of Corporate Compliance  
Station Square  
Paoli, PA 19301

\* Artco

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

**AR000180**

**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
**List of De Minimis Parties' (Alphabetical Order)**

**PAGE: 3**  
**11/30/98**

Asplundh Manufacturing Company  
Mr. Carl Asplundh, President  
1000 Mill Road  
Warrington, PA 19090

Berg Laboratories  
President  
130-C Harding Avenue  
Bellmawr, NJ 08031

\*\* Aston-Hill Company

Biddle Instruments Company  
c/o Aval International  
Mr. Tom Evans, President  
510 Township Line Road  
Blue Bell, PA 19422

Athena Controls  
c/o Inductotherm Industries Incorporated  
J. D. Visco  
10 Indel Avenue  
Rancocas, NJ 08073

Bilgram Gear Company  
Mr. David Winther, President  
8 Union Hill Road  
West Conshohocken, PA 19428

\* Auto Pack

\* Bishop Tube Company

B.P. Oil  
Ms. Cheryl A. Foerstner  
Law Department  
200 Public Square  
11-3454-C  
Cleveland, OH 44114-2375

Bo Peep Cleaners  
President  
18 Doylestown Shopping Center  
Doylestown, PA 18901

Beemer Engineering  
c/o Beemer Precision Company Incorporated  
Mr. H. Meyers, President  
230 New York Drive  
Fort Washington, PA 19034

Boeing  
c/o Boeing Company  
President  
Route 291 & Industrial Parkway  
Ridley Park, PA 19078

Bendtru Company  
c/o Powers Equipment Company Incorporated  
Mr. E. Robert Powers, CEO  
500 Jacksonville Road  
Haverhill, PA 19040

Boekel Industries  
Mr. Al Bush, President  
855 Pennsylvania Avenue  
Feasterville, PA 19053

- 1 Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

**AR000181**

**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
List of De Minimis Parties<sup>1</sup> (Alphabetical Order)

**PAGE: 4**  
**11/30/98**

\* Boyertown Packing Company

C.K. Systematics Incorporated  
c/o Systematics Incorporated  
Mr. James L. Conley, CEO  
1025 Saunders Lane  
West Chester, PA 19380

Brandt Corporation  
c/o Lefebure  
Mr. Joel Patton, President  
308 29th Street NE  
Cedar Rapids, IA 52460

Camdel Metals  
Mr. Millard Vaughn, Plant Manager  
Drawer H  
Revco Industrial Park  
Camden, DE 19934

\*\* Brittany's Ltd.

Cantol Incorporated  
Mr. Elmer E. Snethen  
Executive Vice President  
2211 North American Street  
Philadelphia, PA 19153

Brooks Instrument  
Mr. Robert Heffernan, President  
407 West Vine Street  
Hatfield, PA 19440

Carvel Hall Incorporated  
c/o Syratech Incorporated  
Mr. Leonard Florence, President  
175 McClellan Highway  
East Boston, MA 02128-9115

Brumbaugh Industries  
Mr. Charles Brumbaugh, President  
Route 291  
Eddystone, PA 19022

Chem Cell Corporation  
Mr. Charles Tirell, President  
P.O. Box 296  
Hatboro, PA 19040

Bunnell Plastics Incorporated  
c/o Furon Company  
Mr. J. Michael Hagan, CEO  
29982 Ivy Glenn Drive  
Laguna Indel, CA 92677

Chem-Par  
c/o Liphatech  
Dr. Author A. Nethery  
Vice President of Research & Development  
3101 West Custer Avenue  
Milwaukee, WI 53209

C.K. Systematics Incorporated  
c/o C.K. Worldwide  
Mr. Arthur Klepper, President  
P.O. Box 1636  
Auburn, WA 98071

\* Chem-Solv

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
List of De Minimis Parties<sup>1</sup> (Alphabetical Order)

**PAGE: 5**  
**11/30/98**

Chobert Associates  
c/o Chobert Manufacturing Corporation  
Mr. Frank J. Kearney, Jr.  
Vice President  
100 Landers Lane  
West Chester, PA 19380

\*\* Connecticut Mixed

Chrono-Log Corporation  
Mr. Arthur Freilich, President  
2 West Park Road  
Havertown, PA 19083-4691

Container Research Corporation  
Mr. Christopher J. Pass  
Industrial Engineer  
Hollow Hill Road  
P.O. Box 0159  
Glen Riddle, PA 19037

Classic Coachworks  
Mr. Harry Smith, President  
7310-18 West Chester Pike  
Upper Darby, PA 19082

Contamination Control Incorporated  
c/o Microdot Connectors  
Mr. Ernest Hartland, President  
306 Pasadena Avenue  
South Pasadena, CA 91030

Clifton Precision  
c/o Litton Industries Incorporated  
Jill Palmer, Esq.  
Senior Environmental Counsel  
1700 Yerson Davis Highway, Suite 601  
Annandale, VA 22202

\* Continental Vanguard Incorporated

Coatings For Industry Incorporated  
Mr. James Klotz, President  
319 Township Line Road  
Souderton, PA 18964

\*\* Control Switch

Cobra Wire & Cable Company  
Mr. Bart Reitter, President  
2930 Turnpike Drive  
Hatboro, PA 19040

Controls Service & Engineering  
President  
300 Second Street  
New Cumberland, PA 17071

Concurrent Computer Corporation  
Karen G. Fink, Esq.  
Vice President & General Counsel  
2101 West Cypress Creek Road  
Fort Lauderdale, FL 33309

Cook Specialty Company  
Mr. Thomas A. Panzarella, President  
North Second Street  
P.O. Box 129  
Green Lane, PA 18054-0129

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

**AR000183**

Crown Marketing Equipment Company  
President  
301 Ivyland Road  
Ivyland, PA 18974

\*\* Delaware Container Co. Inc.

CSS International Corporation  
Mr. Roger T. Nazeley, President  
2061 East Glennwood Avenue  
Philadelphia, PA 19124

\*\* Delco Wire & Cable, Inc./Delco Elec.

CW Industries  
Mr. Kalman Lifson, President  
130 James Way  
Southampton, PA 18966

Delmaco Manufacturing Incorporated  
President  
3 Cedar Creek Avenue  
Georgetown, DE 19947

Danco Tool & Mold Company  
Mr. Nicholas Fagan, President  
P.O. Box 448  
Wheatland and Melon Avenue  
Phoenixville, PA 19460

Deltron Incorporated  
Mr. Aaron Anton, President  
P.O. Box 1369  
North Wales, PA 19454

Data Media Incorporated  
c/o DMC Incorporated  
Mr. Thomas Rainone, President  
7025 Central Highway  
Pennsauken, NJ 08109

Dentronix Incorporated  
Ms. Cindy Monroe, President  
101 Steamwhistle Drive  
Ivyland, PA 18974

David K. Robson Incorporated  
Mr. Michael Anastas, President  
738 Maryland Avenue  
Prospect Park, PA 19076

Dettra Flag Company  
Mr. Elmer Bauer, President  
P.O. Box 408  
Oaks, PA 19456

Decision Data  
c/o Decision One  
Mr. Steve Felice, President  
50 East Swedesford Road  
Frasier, PA 19355

DeVilbiss Company  
c/o DeVilbiss Healthcare Incorporated  
Mr. Ray Dyre, President  
P.O. Box 635  
Somerset, PA 15501

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

**AR000184**

**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
**List of De Minimis Parties' (Alphabetical Order)**

**PAGE: 7**  
**11/30/98**

Display Corporation of America  
c/o TSG Merchandising Incorporated  
Mr. Michael Schmidt, President  
1100 Locust Road, Suite 200  
Horsham, PA 19044

E. Hopkins Company  
Al Pappas, President  
3427 South Lawrence Street  
Philadelphia, PA 19148

Diversified Electronic Corporation  
Mr. Bernard Shurman, President  
4969 Wakefield Street  
Philadelphia, PA 19144

E.I.T. Incorporated  
c/o Enterra Instrumentation Technology  
Mr. Howard Lawrence, President  
P.O. Box 744  
Sunbury, PA 17801

Dixon Industries Corporation  
c/o Furon Company  
Mr. Jerry Noonan, President  
29982 Ivy Glenn Drive  
Laguna Niguel, CA 92677

E/M Corporation  
c/o West Lafayette Corporation  
Mr. Robert McDonald, President & CEO  
One Great Lakes Boulevard  
West Lafayette, IN 47906

Doehler-Jarvis  
Mr. Robert J. Jacobson  
Director of Environmental Control  
P.O. Box 902  
Troy, OH 43697-0902

East West Label Company Incorporated  
Mr. Christopher Wilson, President  
P.O. Box 7480  
St. Davids, PA 19087

\*\* Dorado Fabrics

Eaton  
c/o Eaton Corporation  
Mr. Stephen Hardis, CEO  
Eaton Center  
Cleveland, OH 44114

Drexelbrook Engineering  
Mr. Fred Maltby, CEO  
205 Keith Valley Road  
Horsham, PA 19044

Elco Corporation  
c/o Prentice Hall Corporate Systems  
Mr. Benedict Rosen, CEO  
319 Market Street  
Harrisburg, PA 17101

\*\* Dynamic Services

Electro Platers of York Incorporated  
Mr. David Sollenberger, President  
209 East Willow Street  
Wrightsville, PA 17368

- 1 Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

**AR000185**

**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
List of De Minimis Parties<sup>1</sup> (Alphabetical Order)

**PAGE: 8**  
**11/30/98**

\* Electroloy

F B F Industries Incorporated  
Mr. Edward McAllister, President  
Three Glenhardie Corporate Center  
1265 Drummers Lane, Suite 304  
Wayne, PA 19087-1570

Ellisco  
c/o Ellisco Industries  
Mr. Charles Foster, CEO & President  
8901 Yellow Brick Road  
Baltimore, MD 21237

Fabric Development  
Mr. Peter Schah, President  
P.O. Box 462  
1217 Mill Street  
Quakertown, PA 18951

Emeco  
c/o Emeco Industries Incorporated  
Mr. Jay Buchbinder, CEO  
805 West Elm Avenue  
Hanover, PA 17331

Fairfax Cleaners  
c/o Fairfax Valet Cleaners  
Mr. Arthur Kahn, Owner  
3 Fairfax Boulevard  
Wilmington, DE 19803

Empire Abrasive & Equipment Corporation  
Mr. John Gauntt, Controller  
2101 West Cabot Boulevard  
Langhorne, PA 19047-1893

Far East Foods  
Mr. Luke Marano, President  
4950 South Island Road  
Philadelphia, PA 19153

EMR Photoelectric  
c/o Schlumberger EMR  
Mr. John Hunka, President  
20 Wallace Road  
Princeton Junction, NJ 08550

\*\* Fendt Finding Co., Inc.

Ervin's Crafts  
c/o Buchart Horn Incorporated  
Mr. Timothy M. Yohe, PE  
The Industrial Plaza of York  
445 West Philadelphia Street  
P.O. Box 15040  
York, PA 17405-7040

\*Fergusson

\*\* Ext - Corporat

Fluid Power Incorporated  
Mr. David Albrecht, CEO  
534 Township Line Road  
Blue Bell, PA 19422

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

**AR000186**



**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
**List of De Minimis Parties<sup>1</sup> (Alphabetical Order)**

**PAGE: 9**  
**11/30/98**

Formation Incorporated  
Mr. C. [redacted] annell, President  
121 [redacted] Dale Drive  
Moorestown, NJ 08057

Gala Industries  
Mr. Alan Chapman, President & CEO  
6800 Westfield Avenue  
Pennsauken, NJ 08110

Formosa Plastics Corporation, Delaware  
c/o Formosa Plastics Corporation, USA  
Michael G. Karis, Esq.  
9 Peach Tree Hill Road  
Livingston, NJ 07039-5702

Gas Springs  
c/o Stabilus Gas Spring Company  
Mr. Thomas Blomquist, President  
92 County Line Road  
Colmar, PA 18915-9607

Franklin Mint  
Howard P. Lucker, Esq.  
Vice President & General Counsel  
Franklin Center  
U.S. Route 1  
Franklin Center, PA 19091

Gateway Terminal  
Mr. John Pontecorro, President  
P.O. Box 179  
Carteret, NJ 07008

Fraser-Volpe Corporation  
Mr. Joseph Volpe, President  
1025 [redacted] as Drive  
Warminster, PA 18974

General Electric  
c/o Lockheed Martin Corporation  
Ms. Eileen Wisser  
Manager, Environment, Health, and Safety  
230 East Mall Boulevard  
King of Prussia, PA 19406

Frontier Chemical Waste Process  
President  
P.O. Box 1471  
626 Royal Avenue  
Niagara Falls, NY 14303

General Electric  
c/o Lockheed Martin Missiles and Space  
Mr. Mark Posson  
Manager Environmental Protection Program  
ORGN. 47-10, Building 101  
1111 Lockheed Martin Way  
Sunnyvale, CA 94089

FTC Hazardous Incorporated  
c/o Fact Environmental Services  
c/o Hancock Industries  
Mr. Stewart Golen, CEO  
7333 Milnor Street  
Philadelphia, PA 19136

Giles & Ransome  
Mr. Michael D. Barnasevitch  
Risk Management Coordinator  
2975 Galloway Road  
Bensalem, PA 19020

S. K. Garrett Corporation  
Mr. Albert H. Voight, President  
2914 North 16th Street  
Philadelphia, PA 19132

\*\* Giltech, Inc.

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
<sup>2</sup> Address investigation currently being conducted.  
<sup>\*\*</sup> Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
List of De Minimis Parties' (Alphabetical Order)

PAGE: 10  
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Glah Brothers Incorporated  
c/o Formal Affairs Incorporated  
President  
41 South York Road  
Hatboro, PA 19040

H-V Industries Incorporated  
c/o Crown Cork & Seal Company Incorporated  
William T. Gallagher, Esq.  
P.O. Box 6208  
9300 Ashton Road  
Philadelphia, PA 19136

\*\* Globe Solvents

\*\* Hahn Truck Sales

Gould Incorporated  
c/o Gould Electronics Incorporated  
Michael Veysey, Esq.  
34929 Curtis Boulevard  
Eastlake, Ohio 44095

Hale Pumps Incorporated  
c/o Hale Products  
Mr. Wade Roberts, President  
700 Spring Mill Avenue  
Conshohocken, PA 19428

Graphic Packaging Corporation  
Mr. Thomas Warlick  
Corporate Environmental Manager  
350 Griggs Road  
Clover, SC 29710

Heel Company  
William H. Nehrkom II, Esq.  
P.O. Box 8676  
Chattanooga, TN 37414

Green Tweed Company  
Mr. Henry Delfiner, CEO  
2075 Detwiler Road  
Kulpsville, PA 19433

Herman Goldner Company Incorporated  
Ms. Emma L. Anello  
Administrator  
7777 Brewster Avenue  
Philadelphia, PA 19153

Gulf & Western  
c/o Viacom International Incorporated  
Mr. Suer Redtone, CEO  
1515 Broadway  
New York, NY 10036

High Energy Company  
Mr. Dick Robbins, President  
Lower Valley Road  
Parkersburg, PA 19365

\*\* H & L Cleaners

Hollingsworth  
c/o John R. Hollingsworth Company  
Mr. Ray E. White Jr., Secretary  
218 Westridge Gardens  
Phoenixville, PA 19460

- 1 Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
List of De Minimis Parties' (Alphabetical Order)

**PAGE: 11**  
**11/30/98**

Honeywell Instruments  
Ms. Roberta B. Olsen  
Hr [redacted] ell Plaza  
P [redacted] 524  
Minneapolis, MN 55440-0524

J & J Spill  
Mr. C. Philip Ettinger, President  
2949 Felton Road  
Norristown, PA 19403

Hulltronics  
c/o Hull Corporation  
President  
Davisville Road  
Hatboro, PA 19040

J. W. Rex Company  
John W. Rex, President  
8th Street & Valley Forge Road  
Lansdale, PA 19446

\* Hurst Performance

James Spring & Wire Company  
Mr. Timothy Morris, General Manager  
6 North Bacton Hill Road  
Malvern, PA 19355

Imperial Specialty  
Ms. Portia Kirkpatrick, President  
P.O. Box 635  
Pc [redacted], PA 19464

Jetshapes Incorporated  
c/o Interlake ARD Corporation  
President  
550 Warrenville Road  
Lisle, IL 60532-4387

\*\* Industrial Systems Design

John Evans & Sons Incorporated  
Mr. G. D. Bennett, President  
P.O. Box 885  
Spring Avenue  
Lansdale, PA 19446

\*\* Inland Pumping & Dredging

Johnson Company  
Mr. George Stoltsteimer, President  
1765 Woodhaven Drive  
Bensalem, PA 19020

Iron Bound Heat Treating Company  
Mr. John Ross, President  
304 Cox Street  
Roselle, NJ 07203

Johnson Mathey  
Mr. Frank J. Opet  
Vice President, Health, Safety, & Environmental Affairs  
2001 Nolte Drive  
West Deptford, NJ 08096

- \* Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

**AR000189**

**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
**List of De Minimis Parties' (Alphabetical Order)**

**PAGE: 12**  
**11/30/98**

\*\* K S O Industries

**Kulicke & Soffa**  
**Mr. Scott Kulicke, President**  
**2101 Blair Mill Road**  
**Willow Grove, PA 19090**

**K-D Tool Manufacturing**  
**c/o Robert H. Devenney-VP Finance/Administration**  
**Dahaher Tool Group-Professional Tool Division**  
**805 Estelle Drive**  
**P.O. Box 3767**  
**Lancaster, PA 17604-3767**

**L & S Tool & Machine Company**  
**Mr. Terry Livingstone, President**  
**140 Derry Court**  
**York, PA 17402**

**Kawneer Corporation**  
**Mr. Daniel Good, President**  
**555 Guthridge Avenue**  
**Norcross, GA 30092**

**Laminators Incorporated**  
**Mr. J. David Thompson, President**  
**3195 Penn Avenue**  
**Hatfield, PA 19440**

**Keystone Transformer**  
**Mr. Johnny Fox, President**  
**110 Pottstown Avenue**  
**Pennsburg, PA 18073**

**Lancaster Machinery**  
**Mrs. Doris Cohen**  
**835 Glenwood Drive**  
**York, PA 17403**

\* Kosempel

**Lancaster Machinery**  
**c/o PDS Paint Incorporated**  
**President**  
**717 Fountain Avenue**  
**Lancaster, PA 17601**

**Krautkramer-Branson Incorporated**  
**c/o Emerson Electric**  
**Mr. Charles Knight, General Manager**  
**8000 West Florissant Avenue**  
**St. Louis, MO 63136**

**Lavelle Aircraft Company**  
**Mr. Albert Bailey, President**  
**275 Geiger Road**  
**Philadelphia, PA 19115**

**KSM Fastening Systems Incorporated**  
**c/o Blount International Incorporated**  
**Richard H. Irving III, Esq.**  
**4520 Executive Park Drive**  
**Montgomery, AL 36116-1602**

**Leeds & Northrop Company**  
**c/o General Signal Corporation**  
**President**  
**One High Ridge Park**  
**P.O. Box 10010**  
**Stamford, CT 06904-2010**

- 1 Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

**AR000190**

**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
**List of De Minimis Parties' (Alphabetical Order)**

**PAGE: 13**  
**11/30/98**

Lightman Drum Company  
President  
Rt. 1 x 22  
Burlington, NJ 08018

Malco  
c/o Microdot Connectors Incorporated  
Mr. Ernest Heartland, President  
306 Pasadena Avenue  
South Pasadena, CA 91030

Lincoln  
c/o Pentair Corporation  
Mr. Winslow Buxton, President  
1500 County Road  
B2 West, Floor 4  
Saint Paul, MN 55113

\* Manographics

London Harness & Cable Company  
Mr. Mark Greene, President  
330 Pennington Avenue  
Trenton, NJ 08618

Mars Electronics Incorporated  
c/o Mars Electronics International  
Mr. Bruce Beadle, Manager of Logistics  
1301 Wilson Drive  
West Chester, PA 19380

\* Lovekin Corporation

Materials Electronic Products  
c/o MELCOR  
Mr. Sal Giordano, President  
1040 Spruce Street  
Trenton, NJ 08648

\*\* Lowry's

Matheson Instrument  
Mr. Donald Rumlow, President  
30 Seaview Drive  
Secaucus, NJ 07094

M Q S Inspection Incorporated/Magnaflex  
Mr. Ronald Reinhold  
Vice President of Operations  
2301 Arthur Avenue  
Elk Grove Village, IL 60007

Matthew International  
Manager of Environmental Health & Safety  
Two Northshore Center  
Pittsburgh, PA 15212-5851

\*\* Mack Wayne Plastics

McClarín Plastics  
Mr. Todd Kennedy, President  
600 Linden Avenue  
Hanover, PA 17331

- 1 Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

**AR000194**

**McGee Industries Incorporated**  
c/o McLube Division  
Mr. James D. Brady, Technical Director  
P.O. Box 2425  
9 Crozerville Road  
Aston, PA 19014

**Model Finishing**  
c/o Hazardous Materials Management Team  
Mr. Bruce W. Stevens, PE  
P.O. Box 1066  
Newtown, PA 18940

**McHugh Railroad Maintenance Equipment Company**  
Mr. James McHugh Jr., CEO  
225 Lincoln Highway  
Fairless Hills, PA 19030

\* Monitor Systems

**Meade Packaging**  
Mr. Samuel Benedict, President  
10 West 2nd  
Dayton, OH 45463

**Moore Products**  
Mr. William Moore, President  
Sumneytown Pike  
Spring House, PA 19477

**Met-Fin**  
Mr. Gary Lukens, President  
P.O. Box 1127  
4th Street  
North Wales, PA 19454

**Napp Chemical**  
Mr. Hans Kirchgaessner, President  
P.O. Box 893  
299 Market Street  
Saddlebrook, NJ 07663

**Mida Development**  
Edward T. Mida, President  
P.O. Box 3529  
Hampton, VA 23663

**Narco Avionics**  
c/o Telonic Berkeley  
Mr. Steve Hilbert, Vice President  
270 Commerce Way  
Fort Washington, PA 19034

\*\* Mida Manufacturing

**National Metal Crafters**  
Mr. James Redd, President  
1405 East Oxford Street  
Philadelphia, PA 19125

\*\* Mitchell Specialty

\*\* National Solvents Inc.

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

**AR000192**

**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
**List of De Minimis Parties' (Alphabetical Order)**

**PAGE: 15**  
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Netzsch Incorporated  
Mr. Anno Spranger, President & CEO  
1000 Centering Way  
Exton, PA 19341

Olympic Tool & Machine Company  
Mr. Umberto Zavaleta, President  
2100 Bridgewater Road  
Aston, PA 19014

Neutronics  
President  
820 Springdale Drive  
Exton, PA 19406

Oxford Metal Products  
c/o Al Feldman  
Penns Landing Square  
130 Spruce Street, Unit 34A  
Philadelphia, PA 19106

NGK Metals  
Ms. Lynne Woodside  
Supervisor, Environmental Affairs  
Tuckerton Road  
P.O. Box 13367  
Reading, PA 19612-3367

Paris Business Forms  
c/o Paris Business Products  
President  
122 Kissel Road  
Burlington, NJ 08016

Ni-Chro  
c/o Ni-Chro Finishing  
Mr. William Weidemeyer, CEO  
800 West Callowhill Street  
Pottsville, PA 18944

Penflex Incorporated  
Ms. Carol Barker, President  
271 Lancaster Avenue  
Frazer, PA 19355

Norco Finishing  
President  
238 Root Avenue  
Pottstown, PA 19465

Penguin Industries  
Mr. Robert McNeil, President  
Airport Industrial Mall  
Coatesville, PA 19320

North Industrial Chemicals  
Mr. William N. Fay, Vice President  
609 East King Street  
P.O. Box 1904  
York, PA 17403

Penn Airborne Products  
c/o Transacoil Incorporated  
Mr. Robert Carlson, President  
P.O. Box 9011  
Valley Forge, PA 19485

North Penn Polishing & Plating  
Mr. David Otto, President  
P.O. Box 370  
40 West Park Avenue  
Selinsgrove, PA 18960

Penn Dye & Finishing  
c/o Gold Mills Incorporated  
Mr. Nathaniel Weisler, CEO  
137 Tulpehocken Street  
Pine Grove, PA 19485

- \* Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

**AR000193**

\*\* Pennsbury Manufacturing

Peter Paul Cadbury Company  
c/o Motts Incorporated  
James L. Baldwin, Jr., Esq.  
Vice President of Legal Affairs  
6 High Ridge Park  
P.O. Box 3800  
Stamford, CT 06905-0800

Pennwalt Corporation  
c/o Alfa-Laval  
Mr. Bernard Azoulay, CEO  
955 Mearns Road  
Warminster, PA 18974

Petrocon  
c/o Safety Kleen  
President  
1000 Randall Road  
Elgin, IL 60103

\* Penske V.D.A.

Petter Engraving Incorporated  
c/o Petter Company  
David J. Petters  
1361 Lincoln Heights Avenue  
Ephrata, PA 17522

Pepco Manufacturing Company  
Mr. John Kennedy, CEO  
210 Evergreen Avenue  
Somerdale, NJ 08083-0160

Philadelphia Electric Company Oregon Maintenance Shop  
Dawn Getty Sutphin, Esq.  
2301 Market Street  
P.O. Box 8699  
Philadelphia, PA 19101-8699

Peripheral Dynamics  
c/o Inductotherm Industries  
Mr. John Dobson, President  
5150 Campus Drive  
Plymouth Meeting, PA 19462

Philadelphia Rust Proof Company Incorporated  
Mr. Thomas Vezzosi, President  
2086 East Willard Street  
Philadelphia, PA 19134

Permutit  
c/o Sybron International Corporation  
Peter R. Reckmeyer, Esq.  
Corporate Counsel  
411 East Wisconsin Avenue  
Milwaukee, WI 53202

Philadelphia Steel Drum Company Incorporated  
Mr. Lee Piekutoski, CEO  
8 Woodside Drive  
Richboro, PA 18954-1802

Permutit  
c/o Zurn Industries  
Mr. L. Vernon Pace, CEO  
One Zurn Place  
Erie, PA 16505

\* Philco Ford

- 1 Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
**List of De Minimis Parties<sup>1</sup> (Alphabetical Order)**

**PAGE: 17**  
**11/30/98**

Phillips & Jacob  
Mr. [redacted] Borne, President  
11 [redacted] Airport Road  
Lit [redacted] PA 17543

Polysciences  
Mr. Michael Ott, President  
400 Valley Road  
Warrington, PA 18976

PHL Incorporated  
Mr. Richard H. McNutt, Engineer  
3859 Old Easton Road  
Doylestown, PA 18901

\*\* Ponderosa Disposal Co.

Photofabrication Chem. & Equip.  
President  
522 Lancaster Avenue  
Malvern, PA 19355

PQ Corporation  
Michael N. Becci, Esq.  
P.O. Box 840  
Valley Forge, PA 19482-0840

Photolastic Incorporated  
c/o Vishay Intertechnology Incorporated  
Mr. Felix Zandman, CEO  
63 [redacted] Highway  
P [redacted] 4004  
Malvern, PA 19355

Precision Arts Manufacturing  
Mr. Al Musso, Owner  
200 West Somerdale Road  
Voorhees, NJ 08043

Pitman Corporation  
Mr. Kent Fretz, General Manager  
343 Godshall Drive  
Harleysville, PA 19438

Princo Instruments Incorporated  
Mr. Gilbert Pfaff, President  
1020 Industrial Highway  
Southampton, PA 18966

Plate Crafters Incorporated  
Mr. Ronald Spering, President  
230 Bethlehem Pike  
Colmar, PA 18915

Prodelin Incorporated  
Mr. Kuo Huang  
1700 NE Cable Drive  
Conover, NC 28613

Pocono Foundry Incorporated  
President/CEO  
P.O. Box 73  
Stroudsburg, PA 18360

Pyco Incorporated  
Mr. John Metzger Jr., President  
600 East Lincoln Highway  
Penn del, PA 19047

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

**AR000195**

R & E Martin Incorporated  
Mr. Richard Martin II, CEO  
P.O. Box 4701  
Philadelphia, PA 19134

Reynolds Metals  
Mr. Jeremiah Sheehan, President  
P.O. Box 27003  
Richmond, VA 23261

R.R. Donnelley & Sons Incorporated  
Mr. John Walter, Chairman  
77 West Wacker Drive  
Chicago, IL 60601

\*\* Richard Hurst

RC Kletzing  
Mr. Arthur Greisiger, President  
1325 Industrial Boulevard  
Southampton, PA 18966

Sandvik Incorporated  
Mr. Edward Nuzzaci, President  
P.O. Box 1280  
Scranton, PA 18501-1280

RCA  
c/o General Electric  
Kirk McFarlane, Esq.  
640 Freedom Business Center  
King of Prussia, PA 19406

Sanivan Labs  
President  
5129 F Street  
Philadelphia, PA 19124

RDL Incorporated  
Mr. Joe DiBona, President  
7th Avenue and Freeley Streets  
Conshohocken, PA 19428

\* Scotco Design Group Incorporated

\*\* Repco

Scott Paper Corporation  
c/o Kimberly Clark Corporation  
Ms. Marcia Cowan, CEO  
1400 Holcomb Ridge Road  
Roswell, GA 30076

Reynolds Cleaners  
Mr. Mu Yong Chong  
149 South Walnut Street  
Kennett Square, PA 19348

\* Sermetel

\* Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
**List of De Minimis Parties' (Alphabetical Order)**

**PAGE: 19**  
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SGL  
c/o S.L. Waber  
Mr. Arthur Blumenthal, President  
9 Township Road, Suite 306  
Malvern, NJ 08054

\*\* Simonetta Brothers

Shared Medical Systems (SMS)  
Richard Katz, Esq.  
51 Valley Stream Parkway  
Malvern, PA 19355-1406

\*\* Simpson Sign Co.

Sharples Incorporated  
c/o Alfa-Laval  
Mr. Claes Arnegreen, CEO  
955 Mearns Road  
Warminster, PA 18974

\* Singer Company

Shur-Kut Supply Corporation  
Mr. Joe Saddic, President  
P.O. Box 119  
Malvern, PA 19070

SKF Industries Incorporated  
c/o SKF USA Incorporated  
Mr. C. William McGlocklin  
Director, Environmental Affairs  
1100 First Avenue  
King of Prussia, PA 19406

Sikkens Company  
c/o Akzo Nobel Coatings Incorporated  
Mr. Douglas W. Butler  
Senior Environmental Affairs Manager  
4730 Crittendon Drive, P.O. Box 37230  
Louisville, KY 40209

Solar Atmospheres  
Mr. William Jones, President  
1969 Clearview Road  
Souderton, PA 18964

Silvine  
Mr. Harry Silver, President  
P.O. Box 1  
Abington, PA 19001

\*\* Solatario

Simco Company Incorporated  
Mr. Gary Swink, President  
2257 North Penn Road  
Hatfield, PA 19440

Solid State Scientific  
President  
Montgomeryville Industrial Park  
Montgomeryville, PA 18936

- \* Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
List of De Minimis Parties' (Alphabetical Order)

PAGE: 20  
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onic Instruments  
/a Staveley New Jersey  
o The Prentis-Hall Corporate Systems  
resident  
4 State Street -  
oston, MA 02109

Stein Seal Company  
Mr. Leon Joice  
Environmental Coordinator  
1500 Industrial Boulevard  
Kulpsville, PA 19443

PD Technologies  
Mr. Larry Colangelo, President  
3500 Roosevelt Boulevard  
Philadelphia, PA 19116

Sterling Fleishman Company  
Mr. Stephen Fleishman, President  
176 Pennsylvania Avenue  
Malvern, PA 19355

pecialty Castings Incorporated  
Mr. John Cowgill, President  
2 Curtis Avenue  
Woodbury, NJ 08096

-Storm Weather Products  
c/o Mark, Max, or Stanely Ellenberg  
222 Arlingham Road  
Flourtown, PA 19031

perry Univac  
o Unisys Corporation  
ria A. Klees, Esq.  
nvironmental Health & Safety  
ownship Line & Union Meeting Roads  
ue Bell, PA 19424-0001

\*\* Suntemp Industries

pre-Fin Incorporated  
resident  
77 Wissahickon Avenue  
orth Wales, PA 19454

Superior Metal Products  
Mr. Dennis J. Hinger, Project Engineer  
P.O. Box 595  
Pottstown, PA 19464

prague - Griffiths Division  
o Textron  
atricia Bisshopp, Paralegal  
0 Westminster Street  
rovidence, RI 02903

Superior Tube  
Mr. William Sterrett Jr.  
3900 Germantown Pike  
P.O. Box 159  
Collegeville, PA 19426

PS Technologies  
Mr. James D. Dee, Vice President,  
nvironmental & Legal Affairs  
01 Greenwood Avenue  
uite 470  
enkintown, PA 19046

Sweda/Hugin Group  
c/o Litton Industries Incorporated  
Jill Palmer, Esq.  
Senior Environmental Counsel  
1725 Jefferson Davis Highway, Suite 601  
Arlington, VA 22202

\* Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

AR000198

Sweda/Hugin Group  
c/o SWI Liquidating Corporation  
President  
2150 Fish Pool Road  
Lancaster, PA 19353

\* Tele Dynamics

Sweda/Litton  
Jill Palmer, Esq.  
Senior Environmental Counsel  
1725 Jefferson Davis Highway, Suite 601  
Arlington, VA 22202

Telegenix Incorporated  
c/o Inductotherm Industries Incorporated  
Mr. Walter W. Leach, III  
10 Indel Avenue  
P.O. Box 157  
Rancocas, NJ 08073-0157

Synthane Taylor Corporation  
c/o Alco Industries Incorporated  
Ms. Betty Walters  
P.O. Box 937  
Valley Forge, PA 19482-0834

Thermoseal Glass Corporation  
President  
400 Water Street  
Gloucester City, NJ 08030

Techalloy Incorporated  
c/o Rahns Specialty Metals  
Daniel Rico  
Vice President & Chief Operations Officer  
R 13  
R PA 19425-0990

Transducer Systems Incorporated  
c/o Xensor Company  
Dr. Mario Rafalin, President  
4000 Bridge Street  
P.O. Box 188  
Drexel Hill, PA 19026

Technical Products  
Mr. William A. Edmunds, President  
311 North 7th Street  
Perkasie, PA 18944

Trend Instruments Incorporated  
Mr. Robert Trenner, President  
887 South Matlock Street  
West Chester, PA 19382

Technical Products  
Mr. William A. Edmunds, President  
P.O. Box 904  
Hatfield, PA 19440

Troemner, Henry  
c/o Troemner Incorporated  
Mr. Wilber Abele, President  
6825 Greenway Avenue  
Philadelphia, PA 19142

\* Technitrol

\*\* U S Electronic Services Corp.

- \* Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

AR000199

\* U.S. Environmental Services Incorporated

\* Waste Consulting & Brokerage

\*\* United Chem - Con Corp.

Waste Conversion  
c/o Republic Environmental Systems Incorporated  
Mr. Michael D. Logan  
2337 North Penn Road  
Hatfield, PA 19440

United Contamination Controls Incorporated  
Mr. John Anzengruber, CEO  
241 Zimmerman Lane  
Langhorne, PA 19047

\*\* Wave Energy Systems

USA Ardec  
Mr. Mark Wells, Environmental Affairs  
Route 15  
Picatinny Arsenal  
Dover, NJ 07806

Welex Incorporated  
Mr. Hermann Durst  
Vice President, Finance  
850 Jolly Road  
Blue Bell, PA 19422

Valley Forge Laboratories Incorporated  
President  
6 Berkeley Road  
Devon, PA 19333

Westcode Incorporated  
Mr. Edward Widowsin, President  
14 Lee Boulevard  
Malvern, PA 19355

Valley Forge Tape & Label Company  
Mr. Paul Myers, President  
Whiteland Business Park  
119 Summit Drive  
Exton, PA 19341-2889

Westinghouse  
Mr. Gary Clark, President  
11 Stanwix Street  
Pittsburgh, PA 15222

Victualic Company of America  
Mr. George Nauman, CEO  
P.O. Box 31  
Exton, PA 18044-0031

\*\* Wilkinson Industries

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

**AR000200**

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Woodstream Corporation  
c/o Ecko Group Incorporated  
L. Millman, Associate General Counsel  
9 Brook Road, Suite 102  
Nashua, NH 03062

\* Xyantech Incorporated

Yuasa-Exide Battery Corporation  
Mr. Om P. Chopra  
Director, Environmental Resources  
2400 Bennville Road  
Reading, PA 19605

\* Zenith Products Corporation

Zenith Products Corporation  
Ms. Kim Day, President  
200 Commerce Drive  
Aston, PA 19014

- 1 Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.
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AR000201