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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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Filed

ACTION MANUFACTURING CO., INC.,
ALCOA INC. f/k/a ALUMINUM COMPANY OF AMERICA,
ARMSTRONG WORLD INDUSTRIES, INC.,
ABB INC. f/k/a FISCHER & PORTER COMPANY,
BECKETT COMPANY, L.P.,
GENERAL ELECTRIC COMPANY/RCA,
GENERAL MOTORS CORPORATION,
HAMILTON TECHNOLOGIES, INC.
(BULOVA TECHNOLOGIES, L.L.C.),
HAMILTON WATCH COMPANY, INC.
(SWATCH GROUP U.S., INC.),
HANDY & HARMAN,
HAYFORK, L.P. f/k/a HAMILTON PRECISION METALS, INC.,
TUBE CO.,
HERCULES INCORPORATED,
J.W. REX,
LAFRANCE CORPORATION,
LUCENT TECHNOLOGIES INC.,
PENFLEX, INC.,
PLYMOUTH TUBE COMPANY,
REILLY PLATING COMPANY,
SIEMENS ENERGY & AUTOMATION, INC.
f/k/a MOORE PRODUCTS, CO.,
SUNROC CORPORATION,
SYNTEX (USA), INC.,
UNISYS CORPORATION,
AND VIZ LIQUIDATION TRUST

CIVIL ACTION
NO. 02- 8964

FILED DEC - 9 2002

Plaintiffs,

v.

SIMON WRECKING COMPANY,
SIMON WRECKING COMPANY, INC.,
SIMON RESOURCES, INC.,
MID-STATE TRADING COMPANY, INC.,
S & S INVESTMENTS, INC.,
SCHWAB-SIMON REALTY CORPORATION,
TRENTON REALTY CORPORATION,
QUAKER CITY CHEMICALS, INC.,
CENTRAL PENN CHEMICALS,
CENTRAL PENNSYLVANIA CHEMICALS,
QUAKER CITY, INC.,

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(Red)

J & J SPILL SERVICE & SUPPLIES, INC., :
J & J TRANSPORT, INC., :
A & A SEPTIC SERVICE, INC., :
CONTINENTAL VANGUARD, INC., :
LIGHTMAN DRUM COMPANY, :
LIGHTMAN DRUM CO., INC., :
RESOURCE TECHNOLOGY SERVICES, INC. :
BISHOP TUBE CO., :
ELECTRALLOY CORP., :
MERCEGAGLIA USA, INC., :
AMP INCORPORATED, :
TYCO ELECTRONICS CORPORATION, :
TYCO INTERNATIONAL (US), INC., :
TYCO INTERNATIONAL LTD., :
PETROCON INC., :
ANTROL INDUSTRIES, INC. :
MCCLARIN PLASTICS, INC., :
LAVELLE AIRCRAFT COMPANY, :
AMETEK, INC., :
LEEDS AND NORTHRUP COMPANY, :
CSS INTERNATIONAL CORP., :
CSS METAL FABRICATION CORPORATION, :
CSS MACHINE & TOOL CO., INC., :
ECOLOGY SYSTEMS EQUIPMENT :
MANUFACTURING CO., INC., :
TECHNITROL, INC., :
FBF INDUSTRIES, INC., :
FBF, INC., :
ARK PRODUCTS CO., INC., :
MALCO INC., :
MALCO TECHNOLOGIES, INC., :
MALCO TECHNOLOGIES, LLC :
ALPHA TECHNOLOGIES GROUP, INC., :
HIGH ENERGY CORP., :
HIGH ENERGY INDUSTRIES, INC., :
INDUCTOTHERM INDUSTRIES, INC. :
PRINCO INSTRUMENTS, INC., :
PHILCO-FORD, :
LORAL SPACE SYSTEMS, INC. :
(a/k/a SPACE SYSTEMS/LORAL, INC.), :
LORAL SPACE & COMMUNICATIONS, LTD., :
ACCURACY SCIENTIFIC INSTRUMENT CO., INC., :
MONITOR SYSTEMS, INC., :
ENERGY SYSTEMS, INC., :

AYDIN MONITOR SYSTEMS, :
 AYDIN CORPORATION, :
 LANCASTER MACHINERY CO., :
 FOUNTAIN AVENUE ASSOCIATES, :
 PDS PAINT, INC., :
 CUSTOM PACKAGING, :
 WOODWORKERS WORLD, :
 ATHENA CONTROLS INC., :
 EMECO INDUSTRIES, INC., :
 XYNATECH, INC., :
 XYNATECH MANUFACTURING COMPANY, :
 CARVEL HALL, INC. :
 CHI INTERNATIONAL INC., :
 TOWLE MANUFACTURING CO., :
 SYRATECH CORP., :
 MANORGRAPHICS, LTD., :
 ALLISTER MANUFACTURING CO., :
 RELM WIRELESS CORPORATION, :
 SPECIALITY CASTINGS, INC., :
 ELECTROLOY COMPANY, INC., :
 F. J. CAIN CORP., :
 ELECTRODE SALES, INC., :
 SOLID STATE SCIENTIFIC, INC., :
 SPELCO, INC., :
 DCA, INC.(t/s) DISPLAY CORPORATION OF AMERICA, :
 GEORGE K. GARRETT CORP., :
 MSL INDUSTRIES, INC., :
 STORM WEATHER PRODUCTS, INC., :
 WESTAR MANUFACTURING CORPORATION, :
 MSM ASSOCIATES, :
 MODEL FINISHING CO., :
 MODEL FINISHING CO., INC. :
 FRASER-VOLPE CORPORATION, :
 NARCO AVIONICS, INC., :
 MATHESON TRI-GAS, INC., d/b/a :
 MATHESON INSTRUMENTS, :
 CONTAMINATION CONTROL, INC., :
 CONTAMINATION CONTROLS, INC., :
 DAVID K. ROBSON, INC., :
 DKR, INC., :
 C.K. SYSTEMATICS, INC., :
 SYSTEMATICS, INC., :
 OXFORD METAL PRODUCTS CO., :
 NATIONAL METALCRAFTERS, INC., :

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TRANSICOIL, INC., :
HORIZON AEROSPACE, L.L.C., :
FABRIC DEVELOPMENT, INC., :
PRODELIN INC., :
M/A-COM, INC., :
PENSKE CORPORATION, :
FAIRFAX VALET, INC., f/k/a FAIRFAX CLEANERS, :
A & J SCREW MACHINE PRODUCTS, INC., :
SHUR-KUT SUPPLY CORPORATION, :
TELEFLEX INCORPORATED (t/s SERMETAL), :
LOVEKIN R E CORPORATION, :
TELE-DYNAMICS, INC., :
ALEX C. FERGUSSON, INC., :
E.I.T. L.L.C. a/k/a :
ENTERRA INSTRUMENTATION TECHNOLOGY, :
EXIDYNE INSTRUMENTATION TECHNOLOGIES, L.L.C., :
SANIVAN LABORATORIES, INC., :
DOEHLER-JARVIS CORP., :
HARVARD INDUSTRIES, INC., :
CHEM CELL CORPORATION, :
E. FRANK HOPKINS CO., :
AIRLINE HYDRAULICS CORPORATION, :
KEYSTONE TRANSFORMER COMPANY, :
KEYSTONE TRANSFORMER COMPANY, INC., :
ARTCO CORPORATION, :
SINGER EQUIPMENT COMPANY, INC., :
SINGER EQUIPMENT COMPANY, L.P., :
PRECISION ARTS MANUFACTURING, INC., :
FORMAL AFFAIRS, INC. f/k/a, GLAH BROS., INC., :
R C KLETZING, INC., :
HULLTRONICS, INC., :
HULL CORP., :
HULLVAC PUMP CORP., :
HULL/FINMAC INC., :
KOSEMPER MANUFACTURING COMPANY, :
GULF & WESTERN INDUSTRIES, INC., :
GULF & WESTERN SYSTEMS COMPANY, :
GULF & WESTERN MANUFACTURING COMPANY, :
GWM LIQUIDATING COMPANY, :
WICKES MANUFACTURING COMPANY, :
COLLINS & AIKMAN CORP., :
HEARTLAND INDUSTRIAL PARTNERS, L.P., :
SAF SERVICES CORPORATION, :
AXEL JOHNSON METALS, INC., :

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KEYSTONE-BLOCK TRANSPORTATION CO., :
KEYSTONE ENVIRONMENTAL SERVICES, INC., :
FTC HAZARDOUS, INC., :
FTC ENVIRONMENTAL SERVICES, :
ASSOCIATED WASTE EQUIPMENT CO., :
BUILDERS CLEANUP, :
MILQUIP LEASING, :
SAFE DISPOSAL SYSTEM, INC., :
INLAND PUMPING & DREDGING CORP., :
PHILADELPHIA STEEL DRUM CO., INC., :
WASTE CONSULTING & BROKERAGE SERVICES, INC., :
U.S. ENVIRONMENTAL SERVICES, :
DIVERSIFIED ENVIRONMENTAL SERVICES, :
NW CONTROLS INC., :
JOHN DOES ARRANGERS, #1-10 :
JOHN DOES SUCCESSORS TO ARRANGERS, #11-30 :
JOHN DOES TRANSPORTERS, #31-40 :
JOHN DOES SUCCESSORS TO TRANSPORTERS, #41-50 :

Defendants. :

COMPLAINT

Plaintiffs, Action Manufacturing Co., Alcoa Inc. f/k/a Aluminum Company of America, Armstrong World Industries, Inc., ABB Inc. f/k/a Fischer & Porter Company, Beckett Company, L.P., General Electric Company/RCA, General Motors Corporation, Hayfork, L.P. f/k/a Hamilton Precision Metals, Inc., Hamilton Technologies, Inc. (Bulova Technologies, L.L.C.), Hamilton Watch Company (Swatch Group U.S., Inc.) Handy & Harman Tube Co., Hercules Incorporated, J.W. Rex, Lafrance Corporation, Lucent Technologies Inc., Penflex, Inc., Plymouth Tube Company, Reilly Plating Company, Siemens Energy & Automation, Inc. f/k/a Moore Products Co., Sunroc Corporation, Inc., Syntex (USA), Inc., Unisys Corporation, and Viz Liquidation Trust, by their counsel, Conrad O'Brien Gellman & Rohn, P.C., assert as follows:

I. INTRODUCTION

1. Plaintiffs bring this action pursuant to the Comprehensive Environmental

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Response, Compensation and Liability Act, 42 U.S. C. § 9601 *et seq.* ("CERCLA") and Pennsylvania's Hazardous Sites Cleanup Act, 35 P.S. § 6020.101 *et seq.* ("HSCA"), to recover past and future response costs incurred in the environmental cleanup at the Malvern TCE Superfund Site ("Site"), located in East Whiteland Township, Chester County, Pennsylvania. Plaintiffs further seek a declaratory judgment, under federal and state law, that defendants are liable for their equitable shares of all past and future response costs connected to the Site.

II. JURISDICTION AND VENUE

2. This court has jurisdiction over this action pursuant to 42 U.S.C. §§ 9607(a) and 9613(b) and 28 U.S.C. §§ 1331, 1345 and 1367.

3. Additionally, this Court has authority to issue a declaratory judgment concerning the rights and liabilities of the parties pursuant to 28 U.S.C. §§ 2201, 2202 and 42 U.S.C. § 9613(g)(2).

4. Venue is proper in this judicial district pursuant to 28 U.S.C. §§ 1391(b)-(c) and 1395 and 42 U.S.C. §§ 9607(a) and 9613(b), because the releases or threatened releases of hazardous substances that gave rise to the claims in this action occurred in this district, and because the Site is located in this district.

III. PARTIES

A. Plaintiffs

5. Plaintiff Action Manufacturing Co., Inc. is incorporated under the laws of the state of Delaware, with its principal place of business at 100 East Erie Avenue, Philadelphia, Pennsylvania 19134-1009. Plaintiff Action Manufacturing Co., Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

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6. Plaintiff Alcoa Inc. f/k/a Aluminum Company of America is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 201 Isabella Street, Pittsburgh, Pennsylvania 15212. Plaintiff Alcoa Inc. f/k/a Aluminum Company of America is a person within the meaning of 42 U.S.C. § 9601(21).

7. Plaintiff Armstrong World Industries, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 2500 Columbia Avenue, Lancaster, Pennsylvania 17603. Plaintiff Armstrong World Industries, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

8. Plaintiff ABB Inc. f/k/a Fischer & Porter Company is incorporated under the laws of the state of Delaware, with its principal place of business at 501 Merritt 7, Norwalk, Connecticut 06851. Plaintiff ABB Inc. f/k/a Fischer & Porter Company is a person within the meaning of 42 U.S.C. § 9601(21).

9. Plaintiff Beckett Company, L.P. is a Delaware limited partnership, with its principal place of business in Mt. Laurel, New Jersey. Plaintiff Beckett Company, L.P. is a person within the meaning of 42 U.S.C. § 9601(21).

10. Plaintiff General Electric Company / RCA is incorporated under the laws of the state of New York, with its principal place of business at 3135 Easton Turnpike, Fairfield, Connecticut. Plaintiff General Electric Company / RCA is a person within the meaning of 42 U.S.C. § 9601(21).

11. Plaintiff General Motors Corporation is incorporated under the laws of the state of Delaware, with its principal place of business at 300 Renaissance Center, Detroit, Michigan. Plaintiff General Motors Corporation is a person within the meaning of 42 U.S.C. §

9601(21).

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12. Plaintiff Hamilton Technologies, Inc. (Bulova Technologies, L.L.C.) is incorporated under the laws of the state of Delaware, with its principal place of business at 101 North Queen Street, Lancaster, Pennsylvania 17604. Plaintiff Hamilton Technologies, Inc. (Bulova Technologies, L.L.C.) is a person within the meaning of 42 U.S.C. § 9601(21).

13. Plaintiff Hamilton Watch Company (Swatch Group U.S., Inc.) is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business at 1200 Harbor Avenue, Weehawken, New Jersey 07087. Plaintiff Hamilton Watch Company (Swatch Group U.S., Inc.) is a person within the meaning of 42 U.S.C. § 9601(21).

14. Plaintiff Handy & Harman Tube Co. is incorporated under the laws of the state of Delaware, with its principal place of business at located at 701 W. Township Line Road, Norristown, Pennsylvania 19403. Plaintiff Handy & Harman Tube Co. is a person within the meaning of 42 U.S.C. § 9601(21).

15. Plaintiff Hayfork, L.P. f/k/a Hamilton Precision Metals, Inc. is incorporated under the laws of the state of Delaware, with its principal place of business at 1780 Rohrerstown Road, Lancaster, Pennsylvania 17601. Plaintiff Hayfork, L.P. f/k/a Hamilton Precision Metals, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

16. Plaintiff Hercules Incorporated is incorporated under the laws of the state of Delaware, with its principal place of business at Hercules Plaza, 1313 Market Street, Wilmington, Delaware 19894. Plaintiff Hercules Incorporated is a person within the meaning of 42 U.S.C. § 9601(21).

17. Plaintiff J.W. Rex is incorporated under the laws of the Commonwealth of

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Pennsylvania, with its principal place of business in Lansdale, Pennsylvania, 19446. Plaintiff J.W. Rex is a person within the meaning of 42 U.S.C. § 9601(21).

18. Plaintiff LaFrance Corporation is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business at One LaFrance Way, Concordville, Pennsylvania 19331. Plaintiff LaFrance Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

19. Plaintiff Lucent Technologies Inc. is incorporated under the laws of the state of Delaware, with its principal place of business at 600 Mountain Avenue, Murray Hill, New Jersey 07974. Plaintiff Lucent Technologies Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

20. Plaintiff Penflex, Inc. is incorporated under the laws of the state of New York, with its principal place of business at 50 Century Hill Blvd., Suite #3, Latham, New York 12210. Plaintiff Penflex, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

21. Plaintiff Plymouth Tube Company is incorporated under the laws of the state of Michigan, with its principal place of business at 29 West 150 Warrenville Road, Warrenville, Illinois 60555. Plaintiff Plymouth Tube Company is a person within the meaning of 42 U.S.C. § 9601(21).

22. Plaintiff Reilly Plating Company is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 130 Alden Road, Nanticoke, Pennsylvania 18634. Plaintiff Reilly Plating Company is a person within the meaning of 42 U.S.C. § 9601(21).

23. Plaintiff Siemens Energy & Automation, Inc. f/k/a Moore Products Co. is

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incorporated under the laws of the state of Delaware, with its principal place of business in Alpharetta, Georgia. Plaintiff Siemens Energy & Automation, Inc. f/k/a Moore Products Co. is a person within the meaning of 42 U.S.C. § 9601(21).

24. Plaintiff Sunroc Corporation is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business at 60 Starlifter Avenue, Dover, Delaware 19101. Plaintiff Sunroc Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

25. Plaintiff Syntex (USA), Inc. is incorporated under the laws of the state of Delaware, with its principal place of business in Palo Alto, California. Plaintiff Syntex (USA), Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

26. Plaintiff Unisys Corporation is incorporated under the laws of the state of Delaware, with its principal place of business located at Unisys Way, Blue Bell, Pennsylvania 19422. Plaintiff Unisys Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

27. Plaintiff VIZ Liquidation Trust is a trust that is based in Haverford, Pennsylvania. Plaintiff VIZ Liquidation Trust is a person within the meaning of 42 U.S.C. § 9601(21).

B. Defendants

THE SIMON WRECKING DEFENDANTS

28. Defendant Simon Wrecking Company is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 2525 Trenton Avenue, Williamsport, Pennsylvania 17701 and/or R.D. 1 Jersey Shore, Pennsylvania, 17723. Simon Wrecking Company is a person within the meaning of 42 U.S.C. § 9601(21).

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29. Defendant Simon Wrecking Company, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 2525 Trenton Avenue, Williamsport, Pennsylvania 17701 and/or R.D. 1 Jersey Shore, Pennsylvania, 17723. Simon Wrecking Company, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

30. Upon information and belief, Simon Wrecking Company, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Simon Wrecking Company.

31. Defendant Simon Resources, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 2525 Trenton Avenue, Williamsport, Pennsylvania 17701 and/or R.D. 1 Jersey Shore, Pennsylvania 17723. Simon Resources, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

32. Upon information and belief, Simon Resources, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Simon Wrecking Company and Simon Wrecking Company, Inc.

33. Defendant Mid-State Trading Company, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 2525 Trenton Avenue, Williamsport, Pennsylvania 17701 and/or R.D. 1 Jersey Shore, Pennsylvania, 17723. Mid-State Trading Company, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

34. Upon information and belief, Mid-State Trading Company, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Simon Wrecking Company and Simon Wrecking Company, Inc.

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35. Defendant S&S Investments, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 2525 Trenton Avenue, Williamsport, Pennsylvania 17701. S&S Investments, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

36. Upon information and belief, S&S Investments, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Simon Wrecking Company and Simon Wrecking Company, Inc.

37. Defendant Schwab-Simon Realty Corporation is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 2525 Trenton Avenue, Williamsport, Pennsylvania 17701 and/or R.D. 1, Jersey Shore, Pennsylvania, 17723. Schwab-Simon Realty Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

38. Upon information and belief, Schwab-Simon Realty Corporation is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Simon Wrecking Company and Simon Wrecking Company, Inc.

39. Defendant Trenton Realty Corporation is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 2525 Trenton Avenue, Williamsport, Pennsylvania 17701. Trenton Realty Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

40. Upon information and belief, Trenton Realty Corporation is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Simon Wrecking Company and Simon Wrecking Company, Inc.

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41. During the time period between 1952 and 1992, Simon Wrecking Company and Simon Wrecking Company, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to trichlorethylene, to the Site.

42. The transporter(s) for whose services Simon Wrecking Company and Simon Wrecking Company, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Simon Wrecking Company and Simon Wrecking Company, Inc. at the Site.

43. During the time period between 1952 and 1992, Simon Wrecking Company and Simon Wrecking Company, Inc. transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

THE QUAKER CITY DEFENDANTS

44. Defendant Quaker City Chemicals, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 7360 Milnor Street, Philadelphia, Pennsylvania, 19136. Quaker City Chemicals, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

45. Defendant Central Penn Chemicals is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 7360 Milnor Street, Philadelphia, Pennsylvania 19136. Central Penn Chemicals is a person within the meaning of 42 U.S.C. § 9601(21).

46. Upon information and belief, Central Penn Chemicals is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Quaker City Chemicals, Inc.

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47. Defendant Central Pennsylvania Chemicals is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 7360 Milnor Street, Philadelphia, Pennsylvania 19136. Central Pennsylvania Chemicals is a person within the meaning of 42 U.S.C. § 9601(21).

48. Upon information and belief, Central Pennsylvania Chemicals is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Quaker City Chemicals, Inc.

49. Defendant Quaker City, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 7360 Milnor Street, Philadelphia, Pennsylvania 19136. Quaker City, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

50. Upon information and belief, Quaker City, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Quaker City Chemicals, Inc.

51. During the time period between 1952 and 1992, Quaker City Chemicals, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to trichloroethane, chloroform, perchloroethane, perchloroethylene ("PCE"), methylene chloride ("MEC") and propylene glycol, to the Site.

52. The transporter(s) for whose services Quaker City Chemicals, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Quaker City Chemicals, Inc. at the Site.

53. During the time period between 1952 and 1992, Quaker City Chemicals,

Inc. transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

THE J & J SPILL DEFENDANTS

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54. Defendant J & J Spill Service & Supplies, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 2949 Felton Road, Norristown, Pennsylvania 19401. J & J Spill Service & Supplies, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

55. Defendant J & J Transport, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 2949 Felton Road, Norristown, Pennsylvania 19401 and/or P.O. Box 370, Blue Bell, Pennsylvania 19422. J & J Transport, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

56. Upon information and belief, J & J Transport, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of J & J Spill Service & Supplies, Inc.

57. A&A Septic Service, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 2949 Felton Road, Norristown, Pennsylvania 19401. A&A Septic Service, Inc. is a person within the meaning of 42 U.S.C. § 9601 (21).

58. Upon information and belief, A&A Septic Service, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of J & J Spill Service & Supplies, Inc.

59. During the time period between 1952 and 1992, J & J Spill Service & Supplies, Inc. contracted, agreed or otherwise arranged for transportation and disposal of

"hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to carbon tetrachloride, trichloroethane, MEC, and trichloroethylene ("TCE"), to the Site.

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60. The transporter(s) for whose services J & J Spill Service & Supplies, Inc. contracted, agreed or otherwise arranged disposed of some or all of the hazardous substances from J & J Spill Service & Supplies, Inc. at the Site.

61. During the time period between 1952 and 1992, J & J Spill Service & Supplies, Inc. transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

CONTINENTAL VANGUARD, INC.

62. Defendant Continental Vanguard, Inc. is incorporated under the laws of the state of New Jersey, with its principal place of business located at 204 Harding Avenue, Bellmawr, New Jersey 08031. Continental Vanguard, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

63. During the time period between 1952 and 1992, Continental Vanguard, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to trichloroethane, to the Site.

64. The transporter(s) for whose services Continental Vanguard, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Continental Vanguard, Inc. at the Site.

65. During the time period between 1952 and 1992, Continental Vanguard, Inc. transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

THE LIGHTMAN DRUM DEFENDANTS

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66. Defendant Lightman Drum Company is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 1139 S. Cecil Street, Philadelphia, Pennsylvania 19143. Lightman Drum Company is a person within the meaning of 42 U.S.C. § 9601(21).

67. Defendant Lightman Drum Co., Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 139 N. Route 73, Cedarbrook New Jersey 08018. Lightman Drum Co., Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

68. Upon information and belief, Lightman Drum Co., Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Lightman Drum Company.

69. During the time period between 1952 and 1992, Lightman Drum Company contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to trichloroethane and lubricating oil, to the Site.

70. The transporter(s) for whose services Lightman Drum Company contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Lightman Drum Company at the Site.

71. During the time period between 1952 and 1992, Lightman Drum Company transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

RESOURCE TECHNOLOGY SERVICES, INC.

72. Defendant Resource Technology Services, Inc. is incorporated under the

laws of the Commonwealth of Pennsylvania, with its principal place of business located at 6 Berkeley Road, Devon, Pennsylvania 19333. Resource Technology Services, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

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73. During the time period between 1952 and 1992, Resource Technology Services, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to trichloroethane, to the Site.

74. The transporter(s) for whose services Resource Technology Services, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Resource Technology Services, Inc. at the Site.

75. During the time period between 1952 and 1992, Resource Technology Services, Inc. transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

THE BISHOP TUBE DEFENDANTS

76. Defendant Bishop Tube Co. is incorporated under the laws of the Commonwealth of Pennsylvania and the state of Texas, with a principal place of business located at Route 30 and Malin Road, Frazer, Pennsylvania 19355 or 5629 FM 1960 W, Suite 105, Houston, Texas 77069. Bishop Tube Co. is a person within the meaning of 42 U.S.C. § 9601(21).

77. Defendant Electralloy Corp. is incorporated under the laws of the state of New York, with a principal place of business located at 101 West Main Street, P.O. Box 325, Titusville, Pennsylvania 16354-0325. Electralloy Corp. is a person within the meaning of 42

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U.S.C. § 9601(21).

78. Upon information and belief, Electralloy Corp. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Bishop Tube Co.

79. Defendant Mercegaglia USA, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at Route 30 and Malin Road, Frazer, Pennsylvania 19355. Mercegaglia USA, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

80. Upon information and belief, Mercegaglia USA, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Bishop Tube Co.

81. During the time period between 1952 and 1992, Bishop Tube Co. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE, to the Site.

82. The transporter(s) for whose services Bishop Tube Co. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Bishop Tube Co. at the Site.

THE AMP DEFENDANTS

83. Defendant AMP Incorporated is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 2901 Fulling Mill Road, Middleton, Pennsylvania 17057 and/or 123 South Broad Street, Philadelphia, Pennsylvania, 19109. AMP Incorporated is a person within the meaning of 42 U.S.C. § 9601(21).

84. Defendant Tyco Electronics Corporation is incorporated under the laws of

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the Commonwealth of Pennsylvania, with a principal place of business located at 2901 Fulling Mill Road, Middletown, Pennsylvania 17057-3170. Tyco Electronics Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

85. Upon information and belief, Tyco Electronics Corporation is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of AMP Incorporated.

86. Defendant Tyco International (US), Inc. is incorporated under the laws of the Commonwealth of Massachusetts, with a principal place of business located at 1 Tyco Park, Exeter, New Hampshire 03833. Tyco International (US), Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

87. Upon information and belief, Tyco International (US), Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of AMP Incorporated.

88. Defendant Tyco International Ltd. is incorporated under the laws of Bermuda, with a principal place of business located at 10 Queen Street, Hamilton, HM 11, Bermuda. Tyco International Ltd. is a person within the meaning of 42 U.S.C. § 9601(21).

89. Upon information and belief, Tyco International Ltd. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of AMP Incorporated.

90. During the time period between 1952 and 1992, AMP Incorporated contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to PCE, to the Site.

91. The transporter(s) for whose services AMP Incorporated contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from AMP Incorporated at the Site.

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THE PETROCON DEFENDANTS

92. Defendant Petrocon, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at P.O. Box 547, Valley Forge, Pennsylvania 19481 and/or Union Street, Modena, Pennsylvania 19358. Petrocon, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

93. Defendant Antrol Industries, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at P.O. Box 547, Valley Forge, Pennsylvania 19481 and/or Union Street, Modena, Pennsylvania 19358. Antrol Industries, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

94. Upon information and belief, Antrol Industries, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Petrocon Corporation.

95. During the time period between 1952 and 1992, Petrocon, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE, to the Site.

96. The transporter(s) for whose services Petrocon Corporation contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Petrocon Corporation at the Site.

MCCLARIN PLASTICS, INC.

97. Defendant McClarin Plastics, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 600 Linden Avenue, Hanover, Pennsylvania 17331. McClarin Plastics, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

98. During the time period between 1952 and 1992, McClarin Plastics, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to acetone, to the Site.

99. The transporter(s) for whose services McClarin Plastics, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from McClarin Plastics, Inc. at the Site.

LAVELLE AIRCRAFT COMPANY

100. Defendant Lavelle Aircraft Company is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at Sterling and State Streets, Newtown, Pennsylvania 18940 and/or 275 Geiger Road, Philadelphia, Pennsylvania 19115. Lavelle Aircraft Company is a person within the meaning of 42 U.S.C. § 9601(21).

101. During the time period between 1952 and 1992, Lavelle Aircraft Company contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE, to the Site.

102. The transporter(s) for whose services Lavelle Aircraft Company contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Lavelle Aircraft Company at the Site.

AMETEK, INC.

103. Defendant Ametek, Inc. is incorporated under the laws of the state of Delaware, with a principal place of business located at 37 N. Valley Road, Building 4, Paoli, Pennsylvania 19301. Ametek, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

104. During the time period between 1952 and 1992, Ametek, Inc. contracted,

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agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE and 1,1,1-TCE, to the Site.

105. The transporter(s) for whose services Ametek, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Ametek, Inc. at the Site.

LEEDS & NORTHRUP COMPANY

106. Defendant Leeds & Northrup Company is incorporated under the laws of the state of Delaware, with a principal place of business located at 354 N. Sumneytown Pike, North Wales, Pennsylvania 19454 and/or 795 Horsham Road, Horsham, Pennsylvania 19044. Leeds & Northrup Company is a person within the meaning of 42 U.S.C. § 9601(21).

107. During the time period between 1952 and 1992, Leeds & Northrup Company contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE, mixed trichlorethylene, and MEC, to the Site.

108. The transporter(s) for whose services Leeds and Northrup Company contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Leeds and Northrup Company at the Site.

THE CSS INTERNATIONAL CORP. DEFENDANTS

109. Defendant CSS International Corp. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 2061 E. Glenwood Avenue, Philadelphia, Pennsylvania 19124 and/or 4080 Frankford Avenue, Philadelphia, Pennsylvania 19124. CSS International Corp. is a person within the meaning of 42 U.S.C. §

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9601(21).

110. Defendant CSS Metal Fabrication Corporation is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 4080 Frankford Avenue, Philadelphia, Pennsylvania 19124. CSS Metal Fabrication Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

111. Upon information and belief, CSS Metal Fabrication Corporation is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of CSS International Corp.

112. Defendant CSS Machine & Tool Co., Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 2061 E. Glenwood Avenue and/or 4080 Frankford Avenue, Philadelphia, Pennsylvania 19124. CSS Machine & Tool Co., Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

113. Upon information and belief, CSS Machine & Tool Co., Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of CSS International Corp.

114. Defendant Ecology Systems Equipment Manufacturing Co., Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 4080 Frankford Avenue, Philadelphia, Pennsylvania, 19124. Ecology Systems Equipment Manufacturing Co., Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

115. Upon information and belief, Ecology Systems Equipment Manufacturing Co., Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of

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CSS International Corp.

116. During the time period between 1952 and 1992, CSS International Corp. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to trichloroethylene, to the Site.

117. The transporter(s) for whose services CSS International Corp. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from CSS International Corp. at the Site.

TECHNITROL, INC.

118. Defendant Technitrol, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 1210 Northbrook Drive, Suite 385, Trevoise, Pennsylvania 19053. Technitrol, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

119. During the time period between 1952 and 1992, Technitrol, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to trichloroethane, to the Site.

120. The transporter(s) for whose services Technitrol, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Technitrol, Inc. at the Site.

THE FBF DEFENDANTS

121. Defendant FBF Industries, Inc. is incorporated under the laws of the

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Commonwealth of Pennsylvania, with its principal place of business located at 1145 Industrial Boulevard, Southampton, Pennsylvania 18966. FBF Industries, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

122. Defendant FBF, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 1145 Industrial Boulevard, Southampton, Pennsylvania 18966. FBF, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

123. Upon information and belief FBF, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of FBF Industries, Inc.

124. During the time period between 1952 and 1992, FBF Industries, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to xylene, benzene and methylene chloride, to the Site.

125. The transporter(s) for whose services FBF Industries, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from FBF Industries, Inc. at the Site.

ARK PRODUCTS CO., INC.

126. Defendant Ark Products Co., Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 834 Millwood Road, Willow Street, Pennsylvania 17584 and/or 3320 Willow Street Pike S., Willow Street, Pennsylvania 17584. Ark Products Co., Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

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127. During the time period between 1952 and 1992, Ark Products Co., Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

128. The transporter(s) for whose services Ark Products Co., Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Ark Products Co., Inc. at the Site.

THE MALCO DEFENDANTS

129. Malco, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 2511 Highland Avenue, Broomall, Pennsylvania 19008. Malco, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

130. Defendant Malco Technologies, Inc. is incorporated under the laws of the state of Delaware, with a principal place of business located at 94 County Line Road, Colmar, Pennsylvania 18915. Malco Technologies, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

131. Defendant Malco Technologies, LLC is incorporated under the laws of the state of Delaware, with a principal place of business located at 94 County Line Road, Colmar, Pennsylvania 18915. Malco Technologies, LLC is a person within the meaning of 42 U.S.C. § 9601(21).

132. Upon information and belief Malco Technologies, LLC is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Malco Technologies, Inc. and/or Malco, Inc.

133. Alpha Technologies Group, Inc. is incorporated under the laws of the state

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of Delaware with a principal place of business located at 11990 of San Vicente Blvd., Los Angeles, California 90049. Alpha Technologies Group, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

134. Upon information and belief, Alpha Technologies Group, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Malco Technologies, Inc. and/or Malco, Inc.

135. During the time period between 1952 and 1992, Malco Technologies, Inc. and/or Malco, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to hydroxide, TCE, 1,1,1-trichlorethene ("1,1,1-TCE"), to the Site.

136. The transporter(s) for whose services Malco Technologies, Inc. and/or Malco, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Malco Technologies, Inc. and/or Malco, Inc. at the Site.

THE HIGH ENERGY DEFENDANTS

137. Defendant High Energy Corp. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at P.O. Box 308, Lower Valley Road, Parkesburg, Pennsylvania 19365. High Energy Corp. is a person within the meaning of 42 U.S.C. § 9601(21).

138. Defendant High Energy Industries, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 4231 N. 5th Street, Philadelphia, Pennsylvania 19140-2602. High Energy Industries, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

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139. Defendant Inductotherm Industries, Inc. is incorporated under the laws of the state of New Jersey, with a principal place of business located at P.O. Box 157, 10 Indel Avenue, Rancocas, New Jersey 08073. Inductotherm Industries, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

140. Upon information and belief, Inductotherm Industries, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of High Energy Corp.

141. During the time period between 1952 and 1992, High Energy Corp. and/or High Energy Industries, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE, MEC, freon and isopropanol, to the Site.

142. The transporter(s) for whose services High Energy Corp. and/or High Energy Industries, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from High Energy Corp. and/or High Energy Industries, Inc. at the Site.

PRINCO INSTRUMENTS, INC.

143. Defendant Princo Instruments, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 1020 Industrial Highway, Southampton, Pennsylvania 18966. Princo Instruments, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

144. During the time period between 1952 and 1992, Princo Instruments, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

145. The transporter(s) for whose services Princo Instruments, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Princo Instruments, Inc. at the Site.

THE PHILCO-FORD DEFENDANTS

146. Defendant Philco-Ford is incorporated under the laws of the state of Delaware, with a principal place of business located at 4700 Wissahickon Avenue, Philadelphia, Pennsylvania 19144. Philco-Ford is a person within the meaning of 42 U.S.C. § 9601(21).

147. Defendant Loral Space Systems, Inc. (a/k/a Space Systems/Loral, Inc.) is incorporated under the laws of the state of Delaware, with a principal place of business located at 600 3rd Avenue, New York, New York 10016. Loral Space Systems, Inc. (a/k/a Space Systems/Loral, Inc.) is a person within the meaning of 42 U.S.C. § 9601(21).

148. Upon information and belief, Loral Space Systems, Inc. (a/k/a Space Systems/Loral, Inc.) is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Philco-Ford.

149. Defendant Loral Space & Communications Ltd. is incorporated under the laws of Bermuda, with a principal place of business located at 600 3rd Avenue, New York, New York 10016. Loral Space & Communications Ltd. is a person within the meaning of 42 U.S.C. § 9601(21).

150. Upon information and belief, Loral Space & Communications Ltd. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Philco-Ford.

151. During the time period between 1952 and 1992, Philco-Ford contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as

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defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

152. The transporter(s) for whose services Philco-Ford contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Philco-Ford at the Site.

ACCURACY SCIENTIFIC INSTRUMENT CO., INC.

153. Defendant Accuracy Scientific Instrument Co., Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 2335 Church Road and Route 38, Cherry Hill, New Jersey 08002 and/or NE corner of 12th and Cambria Streets, Philadelphia, Pennsylvania 19133. Accuracy Scientific Instrument Co., Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

154. During the time period between 1952 and 1992, Accuracy Scientific Instrument Co., Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

155. The transporter(s) for whose services Accuracy Scientific Instrument Co., Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Accuracy Scientific Instrument Co., Inc. at the Site.

THE MONITOR SYSTEMS DEFENDANTS

156. Defendant Monitor Systems, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 401 Commerce Drive, Fort Washington, Pennsylvania 19034. Monitor Systems, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

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157. Defendant Energy Systems, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 2016 Babcock Boulevard, Pittsburgh, Pennsylvania 15209-1306. Energy Systems, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

158. Upon information and belief, Energy Systems, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Monitor Systems, Inc.

159. Defendant Aydin Monitor Systems is incorporated under the laws of the state of Delaware, with a principal place of business located at 401 Commerce Drive, Fort Washington, Pennsylvania 19034. Aydin Monitor Systems is a person within the meaning of 42 U.S.C. § 9601(21).

160. Upon information and belief, Aydin Monitor Systems is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Monitor Systems, Inc.

161. Defendant Aydin Corporation is incorporated under the laws of the state of Delaware, with a principal place of business located at 700 Dresher Road, Horsham, Pennsylvania 19044. Aydin Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

162. Upon information and belief, Aydin Corporation is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Monitor Systems, Inc.

163. During the time period between 1952 and 1992, Monitor Systems, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to loncosonic #113, to the Site.

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164. The transporter(s) for whose services Monitor Systems, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Monitor Systems, Inc. at the Site.

THE LANCASTER MACHINERY DEFENDANTS

165. Defendant Lancaster Machinery Co. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 715 Fountain Avenue, Lancaster, Pennsylvania 17601. Lancaster Machinery Co. is a person within the meaning of 42 U.S.C. § 9601(21).

166. Defendant Fountain Avenue Associates is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 715 Fountain Avenue, Lancaster, Pennsylvania 17601. Fountain Avenue Associates is a person within the meaning of 42 U.S.C. §9601(21).

167. Upon information and belief, Fountain Avenue Associates is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Lancaster Machine Co.

168. Defendant PDS Paint, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 715 Fountain Avenue, Lancaster, Pennsylvania 17601. PDS Paint, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

169. Upon information and belief, PDS Paint, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Lancaster Machinery Co.

170. Defendant Custom Packaging is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 715 Fountain

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Avenue, Lancaster, Pennsylvania 17601. Custom Packaging is a person within the meaning of 42 U.S.C. § 9601(21).

171. Upon information and belief, Custom Packaging is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Lancaster Machinery Co.

172. Defendant Woodworkers World is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 715 Fountain Avenue, Lancaster, Pennsylvania 17601. Woodworkers World is a person within the meaning of 42 U.S.C. § 9601(21).

173. Upon information and belief, Woodworkers World is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Lancaster Machinery Co.

174. During the time period between 1952 and 1992, Lancaster Machinery Co. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to isopropyl alcohol, 1,1,1-TCE, and isopropanol, to the Site.

175. The transporter(s) for whose services Lancaster Machinery Co. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Lancaster Machinery Co. at the Site.

THE ATHENA CONTROLS INC. DEFENDANTS

176. Defendant Athena Controls Inc., is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 1850 Gravers Road, Plymouth Township, Norristown, Pennsylvania 19401 and/or 5145 Campus Drive, Plymouth Meeting, Pennsylvania 19462. Athena Controls Inc. is a person within the meaning of

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42 U.S.C. § 9601(21).

177. Defendant Inductotherm Industries Inc., is incorporated under the laws of the state of New Jersey, with a principal place of business located at 10 Indel Avenue, Rancocas, New Jersey 18073. Inductotherm Industries, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

178. Upon information and belief, Inductotherm Industries, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Athena Controls Inc.

179. During the time period between 1952 and 1992, Athena Controls Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

180. The transporter(s) for whose services Athena Controls Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Athena Controls Inc. at the Site.

EMECO INDUSTRIES, INC.

181. Defendant Emeco Industries, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 805 W. Elm Avenue, Hanover, Pennsylvania 17331. Emeco Industries, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

182. During the time period between 1952 and 1992, Emeco Industries, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

183. The transporter(s) for whose services Emeco Industries, Inc. contracted,

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agreed or otherwise arranged, disposed of some or all of the hazardous substances from Emeco Industries, Inc. at the Site.

THE XYNATECH DEFENDANTS

184. Defendant Xynatech, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania and New Mexico, with a principal place of business located at 1401 E. Oxford Street, Philadelphia, Pennsylvania 19125; 203 Progress Drive, Montgomeryville, Pennsylvania 18936; and/or 545 Vortex Road, Rio Rancho, New Mexico 87124. Xynatech, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

185. Defendant Xynatech Manufacturing Company is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 203 Progress Drive, Montgomeryville, Pennsylvania 18936 and/or 1401 E. Oxford Streets, Philadelphia, Pennsylvania 19125. Xynatech Manufacturing Company is a person within the meaning of 42 U.S.C. § 9601(21).

186. Upon information and belief, Xynatech Manufacturing Company is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Xynatech, Inc.

187. During the time period between 1952 and 1992, Xynatech, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to xylene, to the Site.

188. The transporter(s) for whose services Xynatech, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Xynatech, Inc. at the Site.

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THE CARVEL HALL DEFENDANTS

189. Defendant Carvel Hall, Inc. is incorporated under the laws of the state of Maryland, with its principal place of business located at P.O. Box 271, 4251 Crisfield Highway, Crisfield, Maryland 21817. Carvel Hall, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

190. Defendant CHI International Inc. is incorporated under the laws of the state of Maryland, with its principal place of business located at P.O. Box 271, 4251 Crisfield Highway, Crisfield, Maryland 21817. CHI International Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

191. Upon information and belief, CHI International Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Carvel Hall, Inc.

192. Defendant Towle Manufacturing Co. is incorporated under the laws of the State of Delaware, with its principal place of business located at 175 McClellan Hwy., East Boston, Massachusetts 02128. Towle Manufacturing Co. is a person within the meaning of 42 U.S.C. § 9601(21).

193. Upon information and belief, Towle Manufacturing Co. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Carvel Hall.

194. Defendant Syratech Corp. is incorporated under the laws of the state of Delaware, with its principal place of business located at 175 McClellan Hwy., East Boston, Massachusetts 02128. Syratech Corp. is a person within the meaning of 42 U.S.C. § 9601(21).

195. Upon information and belief, Syratech Corp. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Carvel Hall.

196. During the time period between 1952 and 1992, Carvel Hall, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to PCE, to the Site.

197. The transporter(s) for whose services Carvel Hall, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Carvel Hall, Inc. at the Site.

MANORGRAPHICS, LTD.

198. Defendant Manorgraphics, Ltd. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 541 Washington Avenue, Phoenixville, Pennsylvania 19460. Manorgraphics, Ltd. is a person within the meaning of 42 U.S.C. § 9601(21).

199. During the time period between 1952 and 1992, Manorgraphics, Ltd. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to PCE, ethylene glycol and acetone, to the Site.

200. The transporter(s) for whose services Manorgraphics, Ltd. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Manorgraphics, Ltd. at the Site.

THE ALLISTER MANUFACTURING DEFENDANTS

201. Defendant Allister Manufacturing Co. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 304 Willowbrook Lane, West Chester, Pennsylvania 19832-5578. Allister Manufacturing is a person

within the meaning of 42 U.S.C. § 9601(21).

202. Defendant Relm Wireless Corporation is incorporated under the laws of the state of Nevada, with a principal place of business located at 342 Willowbrook Lane, West Chester, Pennsylvania 19832-5578. Relm Wireless Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

203. Upon information and belief, Relm Wireless Corporation is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Allister Manufacturing Co.

204. During the time period between 1952 and 1992, Allister Manufacturing Co. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

205. The transporter(s) for whose services Allister Manufacturing Co. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Allister Manufacturing Co. at the Site.

SPECIALTY CASTINGS, INC.

206. Defendant Specialty Castings, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 764 Bessemer Street, Meadville, Pennsylvania 16335. Specialty Castings, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

207. During the time period between 1952 and 1992, Specialty Castings, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous

substances,” as defined in 42 U.S.C. § 9601(14), including but not limited to methylene chloride, to the Site.

208. The transporter(s) for whose services Specialty Castings, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Specialty Castings, Inc. at the Site.

THE ELECTROLOY DEFENDANTS

209. Defendant Electroloy Company, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 39 Market Street, Hatfield, Pennsylvania, and/or 353 Thornbrook Avenue, Rosemont, Pennsylvania 19010. Electroloy Company, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

210. Defendant F.J. Cain Corp. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 39 Market Street, Hatfield, Pennsylvania, and/or 353 Thornbrook Avenue, Rosemont, Pennsylvania 19010. F. J. Cain Corp. is a person within the meaning of 42 U.S.C. § 9601(21).

211. Upon information and belief, F.J. Cain Corp. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Electroloy Company, Inc.

212. Defendant Electrode Sales, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at P.O. Box 330, 39 Market Street, Hatfield, Pennsylvania. Electrode Sales, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

213. Upon information and belief, Electrode Sales, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Electroloy Company, Inc.

214. During the time period between 1952 and 1992, Electroloy Company, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

215. The transporter(s) for whose services Electroloy Company, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Electroloy Company, Inc. at the Site.

THE SOLID STATE SCIENTIFIC DEFENDANTS

216. Defendant Solid State Scientific, Inc. is incorporated under the laws of the state of Delaware, with a principal place of business located at 3824 Terrace Street, Philadelphia, Pennsylvania 19128-5212 and/or Montgomeryville Industrial Center, Montgomeryville, Pennsylvania 18936. Solid State Scientific, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

217. Defendant Spelco, Inc. is incorporated under the laws of the state of Massachusetts, with a principal place of business located at 1361 Farmington Avenue, Pottstown, Pennsylvania 19464. Spelco, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

218. Upon information and belief, Spelco, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Solid State Scientific, Inc.

219. During the time period between 1952 and 1992, Solid State Scientific contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

220. The transporter(s) for whose services Solid State Scientific contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Solid State Scientific at the Site.

DCA, INC./DISPLAY CORPORATION OF AMERICA

221. Defendant DCA, Inc. (t/s Display Corporation of America) is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 1250 Easton Road, Horsham, Pennsylvania 19044-1416. DCA, Inc. (t/s Display Corporation of America) is a person within the meaning of 42 U.S.C. § 9601(21).

222. During the time period between 1952 and 1992, DCA, Inc. (t/s Display Corporation of America) contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE, 1,1,1-TCE and PCE, to the Site.

223. The transporter(s) for whose services DCA, Inc. (t/s Display Corporation of America) contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from DCA, Inc. (t/s Display Corporation of America) at the Site.

GEORGE K. GARRETT CORP. DEFENDANTS

224. Defendant George K. Garrett Corp. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at Early Street, Ellwood City, Pennsylvania 16117. George K. Garrett Corp. Is a person within the meaning of 42 U.S.C. § 9601(21).

225. Defendant MSL Industries, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at Early Street,

Ellwood City, Pennsylvania 16117. MSL Industries is a person within the meaning of 42 U.S.C. § 9601(21).

226. Upon information and belief, MSL Industries, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of George K. Garrett Corp.

227. During the time period between 1952 and 1992, George K. Garrett Corp. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to MEC, 1,1,1-TCE, isopropanol, and freon II, to the Site.

228. The transporter(s) for whose services George K. Garrett Corp. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from George K. Garrett Corp. at the Site.

THE STORM WEATHER PRODUCTS DEFENDANTS

229. Defendant Storm Weather Products, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 3621-31 B Street, Philadelphia, Pennsylvania 19134. Storm Weather Products, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

230. Defendant Westar Manufacturing Corporation is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 3621-31 B Street, Philadelphia, Pennsylvania 19134. Westar Manufacturing Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

231. Upon information and belief, Westar Manufacturing Corporation is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Storm

Weather Products, Inc.

232. Defendant MSM Associates is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 3621 B Street, Philadelphia, Pennsylvania 19134. MSM Associates is a person within the meaning of 42 U.S.C. § 9601(21).

233. Upon information and belief, MSM Associates is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Storm Weather Products, Inc.

234. During the time period between 1952 and 1992, Storm Weather Products, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE and polyurethane, to the Site.

235. The transporter(s) for whose services Storm Weather Products, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Storm Weather Products, Inc. at the Site.

THE MODEL FINISHING DEFENDANTS

236. Defendant Model Finishing Co. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 4949 Cottman Avenue, Philadelphia, Pennsylvania 19135. Model Finishing Co. is a person within the meaning of 42 U.S.C. § 9601(21).

237. Defendant Model Finishing Co., Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 3068 Janney Street, Philadelphia, Pennsylvania 19134. Model Finishing Co., Inc. is a person within the

meaning of 42 U.S.C. § 9601(21).

238. Upon information and belief, Model Finishing Co., Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Model Finishing Co.

239. During the time period between 1952 and 1992, Model Finishing Co. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE, to the Site.

240. The transporter(s) for whose services Model Finishing Co. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Model Finishing Co. at the Site.

FRASER-VOLPE CORPORATION

241. Defendant Fraser-Volpe Corporation is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 1025 Thomas Drive, Warminster, Pennsylvania 18974. Fraser-Volpe Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

242. During the time period between 1952 and 1992, Fraser-Volpe Corporation contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE, MEC, acetone and isopropanol, to the Site.

243. The transporter(s) for whose services Fraser-Volpe Corporation contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Fraser-Volpe Corporation at the Site.

NARCO AVIONICS, INC.

244. Defendant Narco Avionics, Inc. is incorporated under the laws of the state of Delaware, with a principal place of business located at 270 Commerce Drive, Fort Washington, Pennsylvania 19034. Narco Avionics, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

245. During the time period between 1952 and 1992, Narco Avionics, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

246. The transporter(s) for whose services Narco Avionics, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Narco Avionics, Inc. at the Site.

MATHESON TRI-GAS, INC., d/b/a MATHESON INSTRUMENTS

247. Defendant Matheson Tri-Gas, Inc., d/b/a Matheson Instruments ("Matheson"), is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 959 Route 46, Parsippany, New Jersey 07054. Matheson is a person within the meaning of 42 U.S.C. § 9601(21).

248. During the time period between 1952 and 1992, Matheson contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, and freon, to the Site.

249. The transporter(s) for whose services Matheson contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Matheson at the Site.

- **THE CONTAMINATION CONTROL DEFENDANTS**

250. Defendant Contamination Control, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 135 Commerce Drive, Industrial Park, Fort Washington, Pennsylvania 19034. Contamination Control, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

251. Defendant Contamination Controls, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 135 Commerce Drive, Industrial Park, Fort Washington, Pennsylvania 19034. Contamination Controls, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

252. Upon information and belief, Contamination Controls, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Contamination Control, Inc.

253. During the time period between 1952 and 1992, Contamination Control, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to methylene chloride, to the Site.

254. The transporter(s) for whose services Contamination Control, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Contamination Control, Inc. at the Site.

THE DAVID K. ROBSON DEFENDANTS

255. Defendant David K. Robson, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 736-738

Maryland Avenue, Prospect Park, Pennsylvania 19076. David K. Robson, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

256. Defendant DKR, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 736-738 Maryland Avenue, Prospect Park, Pennsylvania 19076. DKR, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

257. Upon information and belief, DKR, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of David K. Robson, Inc.

258. During the time period between 1952 and 1992, David K. Robson, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to heptane, acetone, nitric acid, and alodine, to the Site.

259. The transporter(s) for whose services David K. Robson, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from David K. Robson, Inc. at the Site.

THE C.K. SYSTEMATICS DEFENDANTS

260. Defendant C.K. Systematics, Inc. is incorporated under the laws of the state of Delaware, with a principal place of business located at 1025 Saunders Lane, West Chester, Pennsylvania 19380. C.K. Systematics, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

261. Defendant Systematics, Inc. is incorporated under the laws of the state of Delaware, with a principal place of business located at 1025 Saunders Lane, West Chester,

Pennsylvania 19380. Systematics, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

262. Upon information and belief, Systematics, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of C.K. Systematics, Inc.

263. During the time period between 1952 and 1992, C.K. Systematics, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE and sulfuric acid, to the Site.

264. The transporter(s) for whose services C.K. Systematics, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from C.K. Systematics, Inc. at the Site.

OXFORD METAL PRODUCTS CO.

265. Defendant Oxford Metal Products Co. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 2629 Belgrade Street, Philadelphia, Pennsylvania 19125. Oxford Metal Products Co. is a person within the meaning of 42 U.S.C. § 9601(21).

266. During the time period between 1952 and 1992, Oxford Metal Products Co. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE and 1,1,1-TCE, to the Site.

267. The transporter(s) for whose services Oxford Metal Products Co. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Oxford Metal Products Co. at the Site.

THE NATIONAL METALCRAFTERS, INC. DEFENDANTS

268. Defendant National Metalcrafters, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 1401 E. Oxford Street, Philadelphia, Pennsylvania 19125 and/or 203 Progress Drive, Montgomery, Pennsylvania 18936. National Metalcrafters is a person within the meaning of 42 U.S.C. § 9601(21).

269. Defendant Xynatech Manufacturing Company is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 203 Progress Drive, Montgomeryville, Pennsylvania 18936 and 1401 E. Oxford Street, Philadelphia, Pennsylvania 19125. Xynatech Manufacturing Company is a person within the meaning of 42 U.S.C. § 9601(21).

270. Upon information and belief, Xynatech Manufacturing Company is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of National Metalcrafters, Inc.

271. During the time period between 1952 and 1992, National Metalcrafters, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE and toluene, to the Site.

272. The transporter(s) for whose services National Metalcrafters, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from National Metalcrafters, Inc. at the Site.

THE TRANSICOIL DEFENDANTS

273. Defendant Transicoil, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 2560 General Armistead Avenue, Norristown, Pennsylvania 19403. Transicoil, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

274. Defendant Horizon Aerospace, L.L.C. is incorporated under the laws of the state of New York, with a principal place of business located at 2560 General Armistead Avenue, Norristown, Pennsylvania 19403. Horizon Aerospace, L.L.C. is a person within the meaning of 42 U.S.C. § 9601(21).

275. Upon information and belief, Horizon Aerospace, L.L.C. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Transicoil, Inc.

276. During the time period between 1952 and 1992, Transicoil, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, and acetone, to the Site.

277. The transporter(s) for whose services Transicoil, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Transicoil, Inc. at the Site.

FABRIC DEVELOPMENT, INC.

278. Defendant Fabric Development, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 1217 Mill Street, Quakertown, Pennsylvania 18951. Fabric Development is a person within the meaning of 42

U.S.C. § 9601(24).

279. During the time period between 1952 and 1992, Fabric Development, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to MEC and TCE, to the Site.

280. The transporter(s) for whose services Fabric Development, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Fabric Development, Inc. at the Site.

THE PRODELIN DEFENDANTS

281. Defendant Prodelin Inc. is incorporated under the laws of the state of New Jersey, with its principal place of business located at 7 N.W. England Executive Park, 43 South Avenue, Burlington, Massachusetts 01803. Prodelin Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

282. Defendant M/A-Com, Inc. is incorporated under the laws of the state of New Jersey, with a principal place of business located at 7 N.W. England Executive Park, 43 South Avenue, Burlington, Massachusetts 01803. M/A-Com, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

283. Upon information and belief, M/A-Com, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Prodelin Inc.

284. During the time period between 1952 and 1992, Prodelin Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

285. The transporter(s) for whose services Prodelin Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Prodelin Inc. at the Site.

PENSKE CORPORATION

286. Defendant Penske Corporation is incorporated under the laws of the state of Delaware, with a principal place of business located at 111 Penske Plaza, Reading, Pennsylvania 19063. Penske Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

287. During the time period between 1952 and 1992, Penske Corporation contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

288. The transporter(s) for whose services Penske Corporation contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Penske Corporation at the Site.

FAIRFAX VALET, INC.

289. Defendant Fairfax Valet, Inc. f/k/a Fairfax Cleaners is incorporated under the laws of the state of Delaware, with its principal place of business located at 3 Fairfax Boulevard, Wilmington, Delaware 19803-3022. Fairfax Valet, Inc. f/k/a Fairfax Cleaners is a person within the meaning of 42 U.S.C. § 9601(21).

290. During the time period between 1952 and 1992, Fairfax Valet, Inc. f/k/a Fairfax Cleaners contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to PCE, to

the Site.

291. The transporter(s) for whose services Fairfax Valet, Inc. f/k/a Fairfax Cleaners contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Fairfax Valet, Inc. f/k/a Fairfax Cleaners at the Site.

A & J SCREW MACHINE PRODUCTS, INC.

292. Defendant A & J Screw Machine Products, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at P.O. Box 278, 32 Hamilton Street, Chalfont, Pennsylvania 18914. A & J Screw Machine Products, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

293. During the time period between 1952 and 1992, A & J Screw Machine Products, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

294. The transporter(s) for whose services A & J Screw Machine Products, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from A & J Screw Machine Products, Inc. at the Site.

SHUR-KUT SUPPLY CORPORATION

295. Defendant Shur-Kut Supply Corporation is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 241 Woodland Avenue, Morton, Pennsylvania 19070. Shur-Kut Supply Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

296. During the time period between 1952 and 1992, Shur-Kut Supply Corporation contracted, agreed or otherwise arranged for transportation and disposal of

“hazardous substances,” as defined in 42 U.S.C. § 9601(14), to the Site.

297. The transporter(s) for whose services Shur-Kut Supply Corporation contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Shur-Kut Supply Corporation at the Site.

TELEFLEX INCORPORATED (T/S SERMETAL)

298. Defendant Teleflex Incorporated (t/s Sermetal) is incorporated under the laws of the Commonwealth of Pennsylvania and the state of Delaware, with a principal place of business located at 630 W. Germantown Pike, Suite 450, Plymouth Meeting, Pennsylvania 19462-1018. Teleflex Incorporated (t/s Sermetal) is a person within the meaning of 42 U.S.C. § 9601(21).

299. During the time period between 1952 and 1992, Teleflex Incorporated (t/s Sermetal) contracted, agreed or otherwise arranged for transportation and disposal of “hazardous substances,” as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

300. The transporter(s) for whose services Teleflex Incorporated (t/s Sermetal) contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Teleflex Incorporated (t/s Sermetal) at the Site.

LOVEKIN R E CORPORATION

301. Defendant Lovekin R E Corporation is incorporated under the laws of the state of Delaware, with a principal place of business located at 1505 Race Street, Philadelphia, Pennsylvania 19102-1119. Lovekin R E Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

302. During the time period between 1952 and 1992, Lovekin R E Corporation contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to PCE and TCE, to the Site.

303. The transporter(s) for whose services Lovekin R E Corporation contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Lovekin R E Corporation at the Site.

TELE-DYNAMICS, INC.

304. Defendant Tele-Dynamics, Inc., is incorporated under the laws of the state of Delaware, with its principal place of business located at 5000 Parkside Avenue, Philadelphia, Pennsylvania. Tele-Dynamics, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

305. During the time period between 1952 and 1992, Tele-Dynamics, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

306. The transporter(s) for whose services Tele-Dynamics, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Tele-Dynamics, Inc. at the Site.

ALEX C. FERGUSON, INC.

307. Defendant Alex C. Ferguson, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 25 Spring Mill Road, Malvern, Pennsylvania 19355-1202. Alex C. Ferguson, Inc. is a person within the

meaning of 42 U.S.C. § 9601(21).

308. During the time period between 1952 and 1992, Alex C. Fergusson, Inc. contracted, agreed or otherwise arranged for transportation and disposal of “hazardous substances,” as defined in 42 U.S.C. § 9601(14), to the Site.

309. The transporter(s) for whose services Alex C. Fergusson, Inc. contracted, *agreed or otherwise arranged, disposed of some or all of the hazardous substances from Alex C. Fergusson, Inc. at the Site.*

THE ENTERRA DEFENDANTS

310. Defendant E.I.T. L.L.C., a/k/a Enterra Instrumentation Technology is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 251 Welsh Pool Road, Exton, Pennsylvania 19341. E.I.T. L.L.C., a/k/a Enterra Instrumentation Technology is a person within the meaning of 42 U.S.C. § 9601(21).

311. Defendant Exidyne Instrumentation Technologies, L.L.C. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 251 Welsh Pool Road, Exton, Pennsylvania 19341. Exidyne Instrumentation Technologies, L.L.C. is a person within the meaning of 42 U.S.C. § 9601(21).

312. Upon information and belief, Exidyne Instrumentation Technologies, L.L.C. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of E.I.T. L.L.C., a/k/a Enterra Instrumentation Technology.

313. During the time period between 1952 and 1992, E.I.T. L.L.C., a/k/a Enterra Instrumentation Technology contracted, agreed or otherwise arranged for transportation and disposal of “hazardous substances,” as defined in 42 U.S.C. § 9601(14), including but not

limited to PCE, 1,1,2 trichloro, 1,1,2 trifluoro, freon and methanol, to the Site.

314. The transporter(s) for whose services E.I.T. L.L.C., a/k/a Enterra Instrumentation Technology contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from E.I.T. L.L.C., a/k/a Enterra Instrumentation Technology at the Site.

SANIVAN LABORATORIES, INC.

315. Defendant Sanivan Laboratories, Inc. is incorporated under the laws of the state of New Jersey, with its principal place of business located at 5129 F Street, Philadelphia, Pennsylvania 19124. Sanivan Laboratories, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

316. During the time period between 1952 and 1992, Sanivan Laboratories, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

317. The transporter(s) for whose services Sanivan Laboratories, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Sanivan Laboratories, Inc. at the Site.

THE DOEHLER-JARVIS DEFENDANTS

318. Defendant Doehler-Jarvis Corp. is incorporated under the laws of the state of Delaware, with its principal place of business located at 5400 N. Detroit Avenue, Toledo, Ohio 43612-3573. Doehler-Jarvis Corp. is a person within the meaning of 42 U.S.C. § 9601(21).

319. Defendant Harvard Industries, Inc. is incorporated under the laws of the

state of Florida, with a principal place of business located at 3 Werner Way, Lebanon, New Jersey 08833 and/or 400 Old Reading Pike, Pottstown, Pennsylvania 19464. Harvard Industries, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

320. Upon information and belief, Harvard Industries, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Doehler-Jarvis Corp.

321. During the time period between 1952 and 1992, Doehler-Jarvis Corp. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to PCE, to the Site.

322. The transporter(s) for whose services Doehler-Jarvis Corp. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Doehler-Jarvis Corp. at the Site.

CHEM CELL CORPORATION

323. Defendant Chem Cell Corporation is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at P.O. Box 296, 244 Beatrice Avenue, Hatboro, Pennsylvania 19040. Chem Cell Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

324. During the time period between 1952 and 1992, Chem Cell Corporation contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

325. The transporter(s) for whose services Chem Cell Corporation contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Chem

Cell Corporation at the Site.

E. FRANK HOPKINS CO.

326. Defendant E. Frank Hopkins Co. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 3427 S. Lawrence Street, Philadelphia, Pennsylvania 19148. E. Frank Hopkins Co. is a person within the meaning of 42 U.S.C. § 9601(21).

327. During the time period between 1952 and 1992, E. Frank Hopkins Co. contracted, agreed or otherwise arranged for transportation and disposal of “hazardous substances,” as defined in 42 U.S.C. § 9601(14), to the Site.

328. The transporter(s) for whose services E. Frank Hopkins Co. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from E. Frank Hopkins Co. at the Site.

AIRLINE HYDRAULICS CORPORATION

329. Defendant Airline Hydraulics Corporation is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 3557 Progress Drive, Bensalem, Pennsylvania 19020. Airline Hydraulics Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

330. During the time period between 1952 and 1992, Airline Hydraulics Corporation contracted, agreed or otherwise arranged for transportation and disposal of “hazardous substances,” as defined in 42 U.S.C. § 9601(14), to the Site.

331. The transporter(s) for whose services Airline Hydraulics Corporation contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances

from Airline Hydraulics Corporation at the Site.

THE KEYSTONE TRANSFORMER DEFENDANTS

332. Defendant Keystone Transformer Company is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at Route 683 and Dotts Alley, Pennsburg, Pennsylvania 18073. Keystone Transformer Company is a person within the meaning of 42 U.S.C. § 9601(21).

333. Defendant Keystone Transformer Company, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 110 Pottstown Avenue, Pennsburg, Pennsylvania 18073. Keystone Transformer Company, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

334. Upon information and belief, Keystone Transformer Company, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Keystone Transformer Company.

335. During the time period between 1952 and 1992, Keystone Transformer Company contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

336. The transporter(s) for whose services Keystone Transformer Company contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Keystone Transformer Company at the Site.

ARTCO CORPORATION

337. Defendant Artco Corporation is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 3255 Penn

Avenue, Hatfield, Pennsylvania 19440. Artco Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

338. During the time period between 1952 and 1992, Artco Corporation contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

339. The transporter(s) for whose services Artco Corporation contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Artco Corporation at the Site.

THE SINGER DEFENDANTS

340. Defendant Singer Equipment Company, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 3030 Kutztown Road, Reading, Pennsylvania 19612. Singer Equipment Company, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

341. Defendant Singer Equipment Company, L.P. is incorporated under the laws of the state of Delaware, with its principal place of business located at 3030 Kutztown Road, Reading, Pennsylvania 19612. Singer Equipment Company, L.P. is a person within the meaning of 42 U.S.C. § 9601(21).

342. Upon information and belief, Singer Equipment Company, L.P. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Singer Equipment Company, Inc.

343. During the time period between 1952 and 1992, Singer Equipment Company, Inc. contracted, agreed or otherwise arranged for transportation and disposal of

“hazardous substances,” as defined in 42 U.S.C. § 9601(14), including but not limited to TCE and 1,1,1-TCE, to the Site.

344. The transporter(s) for whose services Singer Equipment Company, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Singer Equipment Company, Inc. at the Site.

PRECISION ARTS MANUFACTURING, INC.

345. Defendant Precision Arts Manufacturing, Inc. is incorporated under the laws of the state of New Jersey, with a principal place of business located at 200 W. Somerdale Road, Voorhees, New Jersey 08043 and/or 4913 Church Road, Mount Laurel, New Jersey 08054. Precision Arts Manufacturing, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

346. During the time period between 1952 and 1992, Precision Arts Manufacturing, Inc. contracted, agreed or otherwise arranged for transportation and disposal of “hazardous substances,” as defined in 42 U.S.C. § 9601(14), including but not limited to TCE, to the Site.

347. The transporter(s) for whose services Precision Arts Manufacturing, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Precision Arts Manufacturing, Inc. at the Site.

FORMAL AFFAIRS, INC., f/k/a GLAH BROS., INC.

348. Defendant Formal Affairs, Inc., f/k/a Glah Bros., Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at Paoli Industrial Park, Paoli, Pennsylvania 19301. Formal Affairs, Inc., f/k/a Glah

Bros., Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

349. During the time period between 1952 and 1992, Formal Affairs, Inc., f/k/a Glah Bros., Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to PCE, to the Site.

350. The transporter(s) for whose services Formal Affairs, Inc., f/k/a Glah Bros., Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Formal Affairs, Inc., f/k/a Glah Bros., Inc. at the Site.

RC KLETZING, INC.

351. Defendant RC Kletzing, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 1325 Industrial Boulevard, Southampton, Pennsylvania 18966-4047. RC Kletzing, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

352. During the time period between 1952 and 1992, RC Kletzing, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

353. The transporter(s) for whose services RC Kletzing, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from RC Kletzing, Inc. at the Site.

THE HULLTRONICS DEFENDANTS

354. Defendant Hulltronics, Inc. is incorporated under the laws of the

Commonwealth of Pennsylvania, with its principal place of business located at 21 Bonair Drive, Warminster, Pennsylvania 18974. Hulltronics, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

355. Defendant Hull Corp. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 21 Bonair Drive, Warminster, Pennsylvania 18974. Hull Corp. is a person within the meaning of 42 U.S.C. § 9601(21).

356. Upon information and belief, Hull Corp. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Hulltronics, Inc.

357. Defendant Hullvac Pump Corp. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 21 Bonair Drive, Warminster, Pennsylvania 18974. Hullvac Pump Corp. is a person within the meaning of 42 U.S.C. § 9601(21).

358. Upon information and belief, Hullvac Pump Corp. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Hulltronics, Inc.

359. Defendant Hull/Finmac Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 21 Bonair Drive, Warminster, Pennsylvania 18974. Hull/Finmac Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

360. Upon information and belief, Hull/Finmac Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Hulltronics, Inc.

361. During the time period between 1952 and 1992, Hulltronics, Inc.

contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to TCE, to the Site.

362. The transporter(s) for whose services Hulltronics, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Hulltronics, Inc. at the Site.

KOSEMPEL MANUFACTURING COMPANY

363. Defendant Kosempel Manufacturing Company is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 3760 M Street, Philadelphia, Pennsylvania 19124. Kosempel Manufacturing Company is a person within the meaning of 42 U.S.C. § 9601(21).

364. During the time period between 1952 and 1992, Kosempel Manufacturing Company contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

365. The transporter(s) for whose services Kosempel Manufacturing Company contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Kosempel Manufacturing Company at the Site.

THE GULF & WESTERN DEFENDANTS

366. Defendant Gulf & Western Industries, Inc. is incorporated under the laws of the state of Delaware, with a principal place of business located at 101 Chester Road, Swarthmore, Pennsylvania 19081. Gulf & Western Industries, Inc. is a person within the

meaning of 42 U.S.C. § 9601(21).

367. Defendant Gulf & Western Systems Company is incorporated under the laws of the state of Delaware, with a principal place of business located at 101 Chester Road, Swarthmore, Pennsylvania 19081. Gulf & Western Systems Company is a person within the meaning of 42 U.S.C. § 9601(21).

368. Upon information and belief, Gulf & Western Systems Company is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Gulf & Western Industries, Inc.

369. Defendant Gulf & Western Manufacturing Company is incorporated under the laws of the state of Delaware, with a principal place of business located at 101 Chester Road, Swarthmore, Pennsylvania 19081. Gulf & Western Manufacturing Company is a person within the meaning of 42 U.S.C. § 9601(21).

370. Upon information and belief, Gulf & Western Manufacturing Company is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Gulf & Western Industries, Inc.

371. Defendant GWM Liquidating Company is incorporated under the laws of the state of Delaware, with a principal place of business located at 101 Chester Road, Swarthmore, Pennsylvania 19081. GWM Liquidating Company is a person within the meaning of 42 U.S.C. § 9601(21).

372. Upon information and belief, GWM Liquidating Company is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Gulf & Western Industries, Inc.

373. Defendant Wickes Manufacturing Company is incorporated under the laws of the state of Delaware, with a principal place of business located at 101 Chester Road, Swarthmore, Pennsylvania 19081. Wickes Manufacturing Company is a person within the meaning of 42 U.S.C. § 9601(21).

374. Upon information and belief, Wickes Manufacturing Company is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Gulf & Western Industries, Inc.

375. Defendant Collins & Aikman Corp. is incorporated under the laws of the state of Delaware, with a principal place of business located at 5755 New King Court, Troy, Michigan 48098. Collins & Aikman Corp. is a person within the meaning of 42 U.S.C. § 9601(21).

376. Upon information and belief, Collins & Aikman Corp. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Gulf & Western Industries, Inc.

377. Defendant Heartland Industrial Partners, L.P. is incorporated under the laws of the state of Delaware, with a principal place of business located at 55 Railroad Avenue, Greenwich, Connecticut 06830. Heartland Industrial Partners, L.P. is a person within the meaning of 42 U.S.C. § 9601(21).

378. Upon information and belief, Heartland Industrial Partners, L.P. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Gulf & Western Industries, Inc.

379. Defendant SAF Services Corporation is incorporated under the laws of the

state of Delaware, with a principal place of business located at 5755 King Drive, Troy, Michigan 48098-2638. SAF Services Corporation is a person within the meaning of 42 U.S.C. § 9601(21).

380. Upon information and belief, SAF Services Corporation is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Gulf & Western Industries, Inc.

381. During the time period between 1952 and 1992, Gulf & Western Industries, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

382. The transporter(s) for whose services Gulf & Western Industries, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from Gulf & Western Industries, Inc. at the Site.

AXEL JOHNSON METALS, INC.

383. Defendant Axel Johnson Metals, Inc. is incorporated under the laws of the state of Delaware, with its principal place of business located at 215 Welsh Pool Road, Lionville-Exton, Pennsylvania 19341. Axel Johnson Metals, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

384. During the time period between 1952 and 1992, Axel Johnson Metals, Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to ethanol, to the Site.

385. The transporter(s) for whose services Axel Johnson Metals, Inc. contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances

from Axel Johnson Metals, Inc. at the Site.

THE KEYSTONE-BLOCK DEFENDANTS

386. Defendant Keystone-Block Transportation Co. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at Huller Lane, P.O. Box #9, Temple, Pennsylvania 19560. Keystone-Block Transportation Co. is a person within the meaning of 42 U.S.C. § 9601(21).

387. Defendant Keystone Environmental Services, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at P.O. Box #9, Huller Lane, Temple, Pennsylvania 19560 and/or 1100 S. Pottsville Pike, Shoemakersville, Pennsylvania 19555. Keystone Environmental Services, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

388. Upon information and belief Keystone Environmental Services, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of Keystone-Block Transportation Co.

389. During the time period between 1952 and 1992, Keystone-Block Transportation Co. transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

THE FTC HAZARDOUS, INC. DEFENDANTS

390. Defendant FTC Hazardous, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 7333 Milnor Street, Philadelphia, Pennsylvania 19136. FTC Hazardous, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

391. Defendant FTC Environmental Services is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 7333 Milnor Street, Philadelphia, Pennsylvania 19136. FTC Environmental Services is a person within the meaning of 42 U.S.C. § 9601(21).

392. Upon information and belief, FTC Environmental Services is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of FTC Hazardous, Inc.

393. Defendant Associated Waste Equipment Co. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 7333 Milnor Street, Philadelphia, Pennsylvania 19136. Associated Waste Equipment Co. is a person within the meaning of 42 U.S.C. § 9601(21).

394. Upon information and belief, Associated Waste Equipment Co. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of FTC Hazardous, Inc.

395. Defendant Builders Cleanup is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 7333 Milnor Street, Philadelphia, Pennsylvania 19136. Builders Cleanup is a person within the meaning of 42 U.S.C. § 9601(21).

396. Upon information and belief, Builders Cleanup is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of FTC Hazardous, Inc.

397. Defendant Milquip Leasing is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 7333 Milnor Street, Philadelphia, Pennsylvania 19136. Milquip Leasing is a person within the meaning of 42

U.S.C. § 9601(21).

398. Upon information and belief, Milquip Leasing is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of FTC Hazardous, Inc.

399. Defendant Safe Disposal System, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 7333 Milnor Street, Philadelphia, Pennsylvania 19136. Safe Disposal System, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

400. Upon information and belief, Safe Disposal System, Inc. is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of FTC Hazardous, Inc.

401. During the time period between 1952 and 1992, FTC Hazardous, Inc. transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, TCE, PCE, and freon, to the Site.

INLAND PUMPING & DREDGING CORP.

402. Defendant Inland Pumping & Dredging Corp. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 359 Jeff Avenue, Ephrata, Pennsylvania 17522 and/or 138 W. Lancaster Avenue, Downingtown, Pennsylvania 19335. Inland Pumping & Dredging Corp. is a person within the meaning of 42 U.S.C. § 9601(21).

403. During the time period between 1952 and 1992, Inland Pumping & Dredging Corp. transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, TCE, and MEC, to the Site.

- **PHILADELPHIA STEEL DRUM CO., INC.**

404. Defendant Philadelphia Steel Drum Co., Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with a principal place of business located at 8 Woodside Drive, Richboro, Pennsylvania 18954-1802. Philadelphia Steel Drum Co., Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

405. During the time period between 1952 and 1992, Philadelphia Steel Drum Co., Inc. transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to MEC, to the Site.

WASTE CONSULTING & BROKERAGE SERVICES, INC.

406. Defendant Waste Consulting & Brokerage Services, Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 128 Nottoway Drive, Penllyn, Pennsylvania 19422. Waste Consulting & Brokerage Services, Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

407. During the time period between 1952 and 1992, Waste Consulting & Brokerage Services, Inc. transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), including but not limited to 1,1,1-TCE, to the Site.

THE U.S. ENVIRONMENTAL SERVICES DEFENDANTS

408. Defendant U.S. Environmental Services is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at Box 511, Rumbaugh Avenue, Mount Pleasant, Pennsylvania 15666. U.S. Environmental Services is a person within the meaning of 42 U.S.C. § 9601(21).

409. Defendant Diversified Environmental Services is incorporated under the

laws of the Commonwealth of Pennsylvania, with its principal place of business located at Box 511, Rumbaugh Avenue, Mount Pleasant, Pennsylvania 15666. U.S. Environmental Services is a person within the meaning of 42 U.S.C. § 9601(21).

410. Upon information and belief, Diversified Environmental Services is an alter ego of, or is a successor in interest to or otherwise liable for, the liabilities of U.S. Environmental Services.

411. During the time period between 1952 and 1992, U.S. Environmental Services transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

N W CONTROLS INC.

412. Defendant N W Controls Inc. is incorporated under the laws of the Commonwealth of Pennsylvania, with its principal place of business located at 2210 Shelly Rd., Harleysville, Pennsylvania 19438. N W Controls Inc. is a person within the meaning of 42 U.S.C. § 9601(21).

413. During the time period between 1952 and 1992, N W Controls Inc. contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

414. The transporter(s) for whose services N W Controls Inc. contracted, agreed, or otherwise arranged, disposed of some or all of the hazardous substances from N W Controls Inc. at the Site.

JOHN DOES ARRANGERS, #1-10

415. Defendants John Does #1-10 are persons within the meaning of 42 U.S.C. §9601(21).

416. During the time period between 1952 and 1992, John Does #1-10 contracted, agreed or otherwise arranged for transportation and disposal of "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

417. The transporter(s) for whose services John Does #1-10 contracted, agreed or otherwise arranged, disposed of some or all of the hazardous substances from John Does #1-10 at the Site.

JOHN DOES SUCCESSORS TO ARRANGERS, #11-30

418. Defendants John Does #11-30 are persons within the meaning of 42 U.S.C. § 9601(21).

419. Upon information and belief, John Does #11-30 are alter egos of, or are successors in interest to or otherwise liable for, the liabilities of John Does #1-10.

JOHN DOES TRANSPORTERS, #31-40

420. Defendants John Does #31-40 are persons within the meaning of 42 U.S.C. § 9601(21).

421. During the time period between 1952 and 1992, John Does #31-40 transported "hazardous substances," as defined in 42 U.S.C. § 9601(14), to the Site.

JOHN DOES SUCCESSORS TO TRANSPORTERS, #41-50

422. Defendants John Does #41-50 are persons within the meaning of 42 U.S.C. § 9601(21).

423. Upon information and belief, John Does #41-50 are alter egos of, or are successors in interest to or otherwise liable for, the liabilities of John Does #31-40.

IV. BRIEF HISTORY OF THE MALVERN TCE SITE

A. Site Description

424. The Site occupies approximately five acres along the southeast side of Bacton Hill in East Whiteland Township, Chester County Pennsylvania.

425. The Site includes a Main Plant Area ("MPA") connected to a Former Disposal Area ("FDA") by a narrow meadow corridor.

426. Existing facilities at the MPA include a former distillation building and seven above-ground storage tanks.

427. The FDA consists of two unlined earthen pits.

428. A transcontinental natural gas pipeline right-of-way exists along the southern boundary of the Site, with residential areas (including the Hillbrook Circle residential development) and areas of natural forest and vegetation bordering the Site to the west, north and east.

429. The Site is owned and operated by Chemclene Corporation ("Chemclene"), which stores hydraulic oil and industrial cleaning solvents.

430. Between approximately 1952 and 1992, Chemclene processed and stored industrial cleaning solvents that were or contained hazardous substances, including TCE, 1,1,1-trichloroethene ("1,1,1-TCE"), PCE and MEC at the Site.

431. Local industries used the TCE, 1,1,1-TCE, PCE, MEC and other solvents which were processed at the Site to degrease metal parts and for other purposes.

432. In some cases, Chemclene put solvents through a distillation process.

433. Chemclene's distillation process produced hazardous wastes as defined

under the Resource Conservation and Recovery Act ("RCRA").

434. Chemclene buried some of the hazardous substances in drums and otherwise disposed of hazardous substances in the FDA and in a Mounded Area located on the western edge of the FDA, which allowed the hazardous substances to seep into the soil and leach into the local groundwater.

B. Environmental Analysis And Response

435. In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Site.

436. Accordingly, between June 1980 and July 1981 the Pennsylvania Department of Environmental Resources (PADER) and Chemclene sampled private domestic wells located near the Site and on-Site monitoring wells.

437. Analytical results from the wells monitored by PADER and Chemclene revealed chlorinated ethenes and related compounds in the underlying aquifer.

438. TCE was detected in wells near the Site at concentrations exceeding the Maximum Contaminant Level (MCL) of 5.0 ug/l.

439. The Site was listed on the National Priorities List (NPL) by EPA in September 1983.

440. The private domestic wells where TCE, ethenes, and related compounds were found were located south of the FDA, with several wells located in the Hillbrook Circle residential development. That development was not connected to a public water supply, but relied on individual domestic wells for their water supply.

441. Chemclene furnished active carbon filters to 20 residential wells in

accordance with its Domestic Well Management Plan until November 1994.

442. In February 1995, EPA assumed control of maintenance activities of the carbon filter units and periodic sampling of the domestic wells, after EPA determined that Chemclene was not following the procedures outlined in its Domestic Well Management Plan.

443. In August 1995, EPA upgraded several of the filter systems in response to analytical results from domestic well samples. EPA interpreted the analytical results as showing that hazardous substances were passing through the existing filters into the homes.

444. In addition to installing carbon filters, Chemclene conducted removal actions after TCE and other compounds were detected in soil and groundwater in 1980.

445. Debris and approximately 300 drums were removed from the FDA excavations between 1981 and 1984.

446. Soils underlying the FDA were excavated to a depth of 15 feet and transported for disposal at a RCRA permitted disposal facility.

447. Additional drums were removed from the Mounded Area of the Site in late 1990; however, soil impacted by Chemclene operations was left in place.

448. Four underground storage tanks were removed from the MPA in 1986.

449. Soil samples collected from below the excavation grade of the tanks exhibited elevated levels of TCE, PCE and 1,1,1-TCA.

450. In addition, elevated levels of volatile organic compounds (VOCs) were detected in soil gas samples collected outside the distillation building where Chemclene had operated its distillation process in the MPA.

451. EPA believed these levels of VOCs were related to Chemclene's past

practices of discharging condensate containing VOCs directly onto the ground surface.

452. As an operating facility, Chemclene entered into a corrective action order with EPA in 1987.

453. A RCRA Facilities Investigation (RFI) Work Plan was approved for the Site in 1989.

454. In July 1992, Chemclene withdrew its RCRA Part B Application as a treatment and storage facility and stopped accepting waste solvents.

455. Chemclene continued to operate a hauling operation and to sell hydraulic fluid, raw TCE and hydrogen peroxide from the Site.

456. Chemclene failed to complete the RCRA RFI and implement interim corrective measures.

457. As a result, EPA began considering the Site under the Superfund remedial program in November 1993.

458. Based on EPA's review of existing information, data gaps were identified and EPA conducted a Remedial Investigation (RI) to complete the necessary data gathering at the Site.

459. EPA completed the RI in January 1997 and the Feasibility Study in June 1997.

460. EPA issued its proposed plan for a comprehensive Site cleanup in June 1997.

461. In November 1997, EPA released the Record of Decision (ROD) for the Site, detailing the proposed remedial plan.

462. To provide an alternative to local groundwater affected or potentially affected by the Site, the ROD required connecting certain residences to a public drinking water supply, with review of the groundwater conditions every five years.

463. To prevent direct contact with soils in the MPA and to reduce the potential for continued migration of these hazardous substances from those soils to the groundwater, the ROD required installation of a cap over the MPA soils which have concentrations of materials above EPA's soil clean up standards; this remedy involved removal of all existing equipment or tanks, Site grading, installation of a cap with storm water control monitoring points, and long-term monitoring.

464. To restore the Site groundwater to beneficial use through removal and treatment of contaminated groundwater, the ROD required groundwater collection by pumping at the locations where the RI had concluded that dense non-aqueous phase liquids were suspected.

465. To reduce the potential for continued migration of hazardous substances into the soils in the FDA and Mounded Area, the ROD required removal of VOCs by geoprobe exploration, excavation and off-Site disposal to a hazardous waste landfill, backfilling, regrading and land stabilization.

466. To reduce concentrations of hazardous substances in groundwater in the FDA and Mounded Area, the ROD required natural attenuation, involving construction of additional monitoring wells, quarterly monitoring, preparation of trend analyses, and annual monitoring reports.

467. EPA contacted all plaintiffs and defendants, as well as some other parties

who have reached de minimis and de micromis settlements with EPA, informing them of potential liability under section 107(a) of CERCLA.

468. On December 13, 1999, plaintiffs entered a Consent Decree with EPA and Pennsylvania Department of Environmental Protection in the United States District Court for the Eastern District of Pennsylvania in which plaintiffs, without admitting liability, promised to pay for the remediation of the Site; the Consent Decree also provided that settling defendants could commence a contribution action against non-settling potentially responsible parties pursuant to 42 U.S.C. § 113(f)(2) and 35 P.S. § 6020.705(c)(2).

469. Plaintiffs have incurred and will continue to incur necessary response costs in connection with the Site that are consistent with the National Contingency Plan (NCP) pursuant to section 107(a)(4)(B) of CERCLA, 42 U.S.C. § 9607(a)(4)(B) and implementing regulations including, without limitation, more than \$842,000 in costs incurred to date to fulfill obligations assumed under the Consent Decree.

COUNT I
CLAIM FOR CONTRIBUTION UNDER CERCLA

470. Plaintiffs incorporate by reference paragraphs 1 through 469 as if fully set forth herein.

471. The Site is a “facility” within the meaning of section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

472. “Hazardous substances,” within the meaning of section 101(14) of CERCLA, 42 U.S.C. § 9601(14), were disposed of, placed or otherwise became located at the Site at times relevant to this action.

473. There have been “releases” within the meaning of section 101(22) of CERCLA, 42 U.S.C. § 9601(22), or threatened releases of hazardous substances into the environment at or from the Site at times relevant to this action.

474. The actions taken by the United States in connection with the Site constitute “response” actions within the meaning of section 101(25) of CERCLA, 42 U.S.C. § 9601(25), in connection with which the United States has incurred costs consistent with the NCP which was promulgated under section 105(a) of CERCLA, 42 U.S.C. § 9605(a), and is codified at 40 C.F.R. part 300, *et seq.*

475. Plaintiffs have incurred and will continue to incur necessary response costs in connection with the Site that are consistent with the NCP, pursuant to section 107(a)(4)(B) of CERCLA, 42 U.S.C. § 9607(a)(4)(B) and implementing regulations including, without limitation, more than \$842,000 in costs incurred to date to fulfill obligations assumed under the Consent Decree.

476. Any person may seek contribution from any other person who is liable or potentially liable under section 107(a) of CERCLA, 42 U.S.C. § 9607(a), 42 U.S.C. § 9613(f)(1).

477. A person is liable under section 107(a) of CERCLA if the person arranged, by contract or otherwise, with a transporter for transport or disposal or treatment, of hazardous substances owned or possessed by such person, by any other party or entity, at any facility or incineration vessel owned or operated by another party or entity and containing such hazardous substances. 42 U.S.C. § 9607(a)(3).

478. A person is liable under section 107(a) of CERCLA if the person accepted any hazardous substances for transport to disposal or treatment facilities, incineration

vessels or sites selected by such person, from which there is a release, or a threatened release which causes the incurrence of response costs. 42 U.S.C. § 9607(a)(4).

479. All defendants are persons who are liable for arranging for the transport of hazardous substances to the Site, under 42 U.S.C. § 9607(a)(3), or for transporting hazardous substances to the Site, under 42 U.S.C. § 9607(a)(4).

480. Plaintiffs have a right of contribution against all defendants to recover response costs that plaintiffs have incurred or may incur in the future concerning the Site.

481. To date, plaintiffs have incurred in excess of \$842,000 in response costs, all of which are necessary response costs consistent with the NCP pursuant to section 42 U.S.C. § 9607(a)(4)(B).

WHEREFORE, plaintiffs respectfully request that judgment be entered in their favor and against defendants:

482. Ordering each defendant to pay contribution to plaintiffs in a sum to be determined by the Court to be owed to plaintiffs for response costs;

483. Ordering a declaratory judgment that each defendant is liable under 42 U.S.C. § 9613(f)(1) to provide contributions to plaintiffs for response costs which plaintiffs have incurred or may incur in the future in connection with the Site;

484. Awarding plaintiffs their costs and attorneys' fees; and

485. Awarding plaintiffs all other relief that the Court deems appropriate.

COUNT II
HSCA COST RECOVERY CLAIM

486. Plaintiffs incorporate by reference paragraphs 1 through 485 as if fully set forth herein.

487. The Site is a "site" within the meaning of section of 103 of the Hazardous Sites Cleanup Act ("HSCA"), 35 P.S. § 6020.103.

488. There have been "releases" or "substantial threats of releases" of "hazardous substances" and "contaminants" into the environment at or from the Site at times relevant to this action within the meaning of sections 101(22), 103 and 501(a) of HSCA, 35 P.S. §§ 6020.101(22), 6020.103 and 6020.501(a).

489. A person is legally responsible under section 701(a)(2) of HSCA, 35 P.S. § 6020.701(a)(2), for the release or threatened release of a hazardous substance from a site when the person generates, owns or possesses a hazardous substance and arranges by contract, agreement or otherwise for the disposal, treatment or transport of the hazardous substance.

490. A person is legally responsible under section 701(a)(3) of HSCA, 35 P.S. § 6020.701(a)(3), for the release or threatened release of a hazardous substance from a site when the person accepts hazardous substances for transport to disposal or treatment facilities, incineration vessels or sites selected by such person from which there is a release or threatened release which causes the incurrence of response costs.

491. All defendants are persons who are legally responsible for arranging for the transport of hazardous substances to the Site, under 35 P.S. § 6020.701(a)(2), or for transporting hazardous substances to the Site, under 35 P.S. § 6020.701(a)(3).

492. All defendants are "responsible persons," *i.e.*, persons responsible for a release or threatened release of hazardous substances at or from the Site. 35 P.S. §§ 6020.103 and 6020.701.

493. All response costs which defendants have incurred in connection with the

Site are "reasonable and necessary or appropriate" within the meaning of section 702 of HSCA, 35 P.S. § 6020.702.

494. Thus, defendants are strictly liable, jointly and severally, for all response costs that plaintiffs have incurred or may incur in the future in connection with the Site, pursuant to section 702 of HSCA, 35 P.S. § 6020.702.

WHEREFORE, plaintiffs respectfully request that judgment be entered in their favor and against defendants:

495. Ordering each defendant to reimburse plaintiffs for all response costs which plaintiffs have incurred or may incur in the future in connection with the Site;

496. Ordering a declaratory judgment that each defendant shall be jointly and severally liable under 35 P.S. § 6020.702 for all response costs which plaintiffs have incurred or may incur in the future in connection with the Site;

497. Awarding plaintiffs their costs and attorneys' fees; and

498. Awarding plaintiffs all other relief that the Court deems appropriate.

COUNT III
CLAIM FOR CONTRIBUTION UNDER HSCA

499. Plaintiffs incorporate by reference paragraphs 1 through 498 as if fully set forth herein.

500. As described above, defendants are responsible persons under 35 P.S. § 6020.701.

501. As responsible persons under 35 P.S. § 6020.701, defendants are liable to plaintiffs for contribution to reimburse plaintiffs' for response costs incurred in the past and future in connection with the Site, under section 705 of HSCA, 35 P.S. § 6020.705.

502. In determining the allocation of contributions, the trier of fact shall consider equitable factors, including: (1) the extent to which each party's contribution to the release of hazardous substances can be distinguished; (2) the amount of hazardous substance involved; (3) the degree of toxicity of the hazardous substance involved; (4) the degree of involvement of and care exercised by each party in manufacturing, treating, transporting and disposing of the hazardous substance; (5) the degree of cooperation by each party with federal, state or local officials to prevent harm to the public health or the environment; and (6) knowledge by each party of the hazardous nature of the substance. 35 P.S. § 6020.705(b).

503. All response costs which defendants have incurred in connection with the Site are "reasonable and necessary or appropriate" within the meaning of section 702 of HSCA, 35 P.S. § 6020.702.

504. Thus, defendants are liable for all response costs that plaintiffs have incurred or may incur in the future in connection with the Site, pursuant to section 705 of HSCA, 35 P.S. § 6020.705.

WHEREFORE, plaintiffs respectfully request that judgment be entered in their favor and against defendants:

505. Ordering each defendant to reimburse plaintiffs for all response costs which plaintiffs have incurred or may incur in the future in connection with the Site;

506. Ordering a declaratory judgment that each defendant shall be liable under 35 P.S. § 6020.702 for all response costs which plaintiffs have incurred or may incur in the future in connection with the Site;

507. Awarding plaintiffs their costs and attorneys' fees; and

508. Awarding plaintiffs all other relief that the Court deems appropriate.

COUNT IV
DECLARATORY JUDGMENT UNDER FEDERAL LAW

509. Plaintiffs incorporate by reference paragraphs 1 through 508 as if fully set forth herein.

510. Pursuant to the Federal Declaratory Judgments Act, 28 U.S.C. § 2201, plaintiffs are entitled to a declaratory judgment holding defendants liable for their equitable shares of all response costs incurred by plaintiffs, in the past or future, in connection with the Site.

WHEREFORE, plaintiffs respectfully request that judgment be entered in their favor and against defendants:

511. Ordering each defendant to reimburse plaintiffs for all response costs which plaintiffs have incurred or may incur in the future in connection with the Site;

512. Ordering a declaratory judgment that each defendant shall be jointly and severally liable under 35 P.S. § 6020.702 for all response costs which plaintiffs have incurred or may incur in the future in connection with the Site;

513. Awarding plaintiffs their costs and attorneys' fees; and

514. Awarding plaintiffs all other relief that the Court deems appropriate.

COUNT V
DECLARATORY JUDGMENT UNDER STATE LAW

515. Plaintiffs incorporate by reference paragraphs 1 through 514 as if fully set forth herein.

516. Pursuant to the Pennsylvania Declaratory Judgments Act, 42 Pa.C.S.A. §

7532, plaintiffs are entitled to a declaratory judgment holding defendants liable for their equitable shares of all response costs incurred by plaintiffs, in the past or future, in connection with the Site.

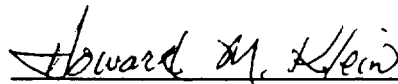
WHEREFORE, plaintiffs respectfully request that judgment be entered in their favor and against defendants:

517. Ordering each defendant to reimburse plaintiffs for all response costs which plaintiffs have incurred or may incur in the future in connection with the Site;

518. Ordering a declaratory judgment that each defendant shall be jointly and severally liable under 35 P.S. § 6020.702 for all response costs which plaintiffs have incurred or may incur in the future in connection with the Site;

519. Awarding plaintiffs their costs and attorneys' fees; and

520. Awarding plaintiffs all other relief that the Court deems appropriate.



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