

# EASTMAN & SMITH LTD.

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*Established 1844*

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May 13, 2016

## VIA FEDERAL EXPRESS

Ms. Sharon Fang (3H521)  
Remedial Project Manager  
U.S. Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103

**Re: North Penn Area 5 Superfund Site**  
**Response of ZF North America, Inc. to Special Notice Letter**  
Our File No: Z1018/168305

Dear Ms. Fang:

This letter responds on behalf of ZF North America, Inc., successor by merger to ZF Sachs Automotive of America, Inc., ("ZF") to U.S. EPA's Special Notice Letter dated March 16, 2016 regarding the performance of a Supplemental RI/FS for Operable Unit 2 at the captioned site.

As explained in prior communications with U.S. EPA, Stabilus, Inc. assumed all liabilities and obligations, including environmental liabilities, in 2001 from ZF (f/k/a Fichtel & Sachs) relating to the business operations of the former Stabilus Division of ZF, including the Colmar, Pennsylvania facility which is located in a portion of the Operable Unit 2 area referenced in the Agency's Special Notice Letter. Stabilus, Inc. has consistently accepted responsibility for matters related to the former Stabilus facility, and, in fact, is currently performing an ongoing interim remedy at the facility which involves bioremediation.

On May 6, 2016, Stabilus, Inc. offered in response to U.S. EPA's Special Notice Letter a proposal that the Agency's requested Supplemental RI/FS for Operable Unit 2 be bifurcated, with Stabilus, Inc. working with other potentially responsible parties at the former Stabilus facility to install several bedrock monitoring wells on that property. ZF supports Stabilus, Inc.'s proposal, and intends to continue to communicate and coordinate with Stabilus, Inc. regarding future negotiations with U.S. EPA.

Columbus

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Detroit

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Findlay

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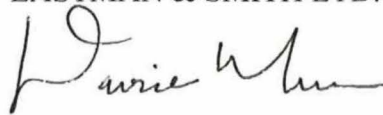
Toledo

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If you require anything further on behalf of ZF at this time, please contact the undersigned. Otherwise, we encourage U.S. EPA to favorably consider Stabilus, Inc.'s proposal for completing investigations at the former Stabilus facility.

Respectfully submitted,

EASTMAN & SMITH LTD.

A handwritten signature in black ink, appearing to read "David W. Nunn", written in a cursive style.

David W. Nunn

DWN/dll

cc: James Van Orden, Esq.  
Joel Bolstein, Esq.  
Thomas Schank, Esq.