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BROWNING-FERRIS INDUSTRIES

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Robert L. Gulley
Attorney

FEDERAL EXPRESS

July 20, 1989

Ms. Carolyn D. Bohlen
Superfund Program Management
Branch 5HSM-12
U.S. Environmental Protection Agency
230 South Dearborn Street
Chicago, Illinois 60604

RE: Yeoman Creek Landfill

Dear Ms. Bohlen:

This letter responds to your CERCLA Section 104(e) Information Request (Request) received June 19, 1989 addressed to Browning-Ferris Industries of Illinois, Inc. (BFIIIL). The response to the Information Request received June 15, 1989 has been submitted under separate cover.

BFIIIL has responded to two previous 104(e) Requests regarding the Yeoman Creek Landfill (YCL). The first Request was dated March 24, 1987 and was addressed to BFI Waste Systems. The Response to that Request was submitted on May 21, 1987 on behalf of BFIIIL, the appropriate legal entity, by Ms. Marina Bouley and is attached as Exhibit 1. The second Request was dated February 7, 1989 and was addressed to Waukegan Disposal. The Response to that Request was submitted on March 13, 1989 also on behalf of the appropriate legal entity, BFIIIL, and is attached as Exhibit 2.

For your information, we provide the following corporate history of BFIIIL.

- o Browning-Ferris Industries, Inc. acquired National Disposal Contractors, Inc. and National Disposal Service, Inc., and its subsidiary, National Disposal Service of Illinois, Inc., on 8/20/71.
- o On 6/30/72, Waukegan Disposal Service, Inc. merged with National Disposal Service of Illinois, Inc..
- o National Disposal Service of Illinois, Inc. changed its' name to Browning-Ferris Industries of Illinois, Inc. on 11/20/72.

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- o National Disposal Contractors, Inc. and National Disposal Service, Inc. merged into Browning-Ferris Industries of Illinois, Inc. on 10/29/76 and 3/7/79 respectively.

Below you will find a recitation of each individual Information Request, followed by a detailed answer to each request.

1. Did you ever use, purchase, generate, store, treat, dispose, transport or otherwise handle any materials at the Site? If your answer to this question is anything but an unequivocal no, answer the following questions:

Response: Based on information obtained through interviews with individuals with knowledge of waste disposal practices during the relevant time period, two predecessors-in-interest to BFIIIL have handled materials at the YCL. These entities are Waukegan Disposal Service, Inc. (hereinafter Waukegan Disposal) and National Disposal Service of Illinois, Inc. (hereinafter National). Waukegan Disposal was a transporter of both residential and commercial waste to the YCL. National hauled residential waste, pursuant to contractual agreement with the City of Waukegan, and commercial waste to the YCL, as well as operated the YCL. Based on interviews conducted with persons with knowledge of the YCL, National is believed to have operated the YCL from 1959 to 1969.

- a. identify the chemical composition, characteristics, physical state (e.g., solid, liquid), and trade or chemical name of each material;

Response: BFIIIL has transported solid waste material consisting of general garbage and refuse and liquid materials contained in drums, buckets and pails to the YCL. BFIIIL has been unable to determine the chemical composition and characteristics of these wastes.

- b. state whether any of these materials were or contained "hazardous substances" as defined by CERCLA Section 101(14), 42 U.S.C. Section 9601(14);

Response: BFIIIL has been unable to determine the chemical composition and characteristics of the wastes hauled to the YCL. Therefore, BFIIIL has no knowledge that the waste materials referenced in response 1(a) contained "hazardous substances" as defined by CERCLA Section 104(14), 42 U.S.C. Section 9601 (14).

- c. the person who supplied you with each such material, disposed or otherwise handled by you;

Based on interviews conducted with individuals with knowledge of the relevant time period, known commercial customers of National whose wastes probably were transported to the YCL include:

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Abbott Laboratories (Abbott Park)
American Hospital Supply Corp. (now Baxter Pharmaceuticals)
Anchor Hocking (glass manufacturer)
Goodyear Tire & Rubber (tire manufacturer)
J.C. Penney (retail department store)
Lakehurst (retail department store)
U.S. Steel/U.S. Cyclone (manufacturer of steel products)
Weibolts (retail department store)
Zayre (retail department store)

In addition to the commercial customers listed above, National transported waste from various restaurants and large apartment buildings in the Waukegan, Illinois area.

National also transported residential waste from the City of Waukegan pursuant to Agreements with the City. Provided in Exhibit 3 are Agreements between BFIIL entities and the City of Waukegan. These Agreements describe procedures to be followed for collecting and disposing of the city's residential garbage and rubbish.

National also transported residential and commercial waste from the City of North Chicago pursuant to Agreement. Based on interviews conducted with individuals with knowledge of the relevant time period, waste hauled from the City of North Chicago was taken to the YCL for disposal. Contained within Exhibit 4 are the Agreements between BFIIL entities and the City of North Chicago describing procedures to be followed for collecting and disposing of the City's residential and commercial garbage. Also enclosed with Exhibit 4 are letters extending the terms of the Agreements.

Based on interviews conducted with individuals with knowledge of the relevant time period, known commercial customers of Waukegan Disposal whose wastes probably were transported to the YCL include:

Ace Hardware
Belvidere Mall (approximately 30 stores)
Boren's Moving (storage warehouse)
J. Blumberg Furniture
Blumberg Appliance
Buehler's Food
Burkhart's Bottle Shop (liquor store)
Cadillac Packaging (paper packaging company)
Caples Photo
Carriage House
Chandler's Office Supply
Chuck Hine's (men's clothing)
Chuck Wagon (restaurant)
Commercial Printers

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Commonwealth Edison Company
Convenient Food Mart
Midland Dexter
Dom's Liquors
Dominicks
Eagle Food
E.C.I. (Electronic Components, Inc.)
Feinberg's Men's Wear
Feldco-Major
Globe Store (retail store)
Glen Rock Beverage
Gold Standard Liquors
Gordons Auto
Grand Liquors
Haese's Food
Handi-Tap (molding company)
Harmony Haven (musical appliance retail)
Hein's (clothing)
Illinois Bell Telephone
Interstate Electric (electrical retail)
J. Meyer Co.
Jewel-Osco
K-Mart
Kalva Corp. (chocolate manufacturer)
King's Furniture
Lake County Movers
Lake County Press
Lake County Office Supply
Lake Shore Harley Davidson
Lanathon's (retail clothing)
Larson & Peterson Paint Store
Leath Furniture
Little Food Store
Little Fort Restaurant
Montgomery Ward
Mordhorst Transfer & Storage
Musicland
Narroed Movers
National Biscuit (warehouse)
National Tea (supermarket)
Northern Illinois Warehouse
Open Pantry
Pfanstiehl (chemical packaging plant)
Pic-Way Shoes
Playback, Inc.
Polk Bros.
Potter Pharmacy
Quality Books
R&S Liquors
Chas. J. Sach's
Sample Furniture

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Schiff Shoes
Scott's Bicycle
Sears, Roebuck
Stone Container
St. Theresa Hospital
7-11 Food Store
Chicago Sun-Times
Taylor Furniture
Ted's Food Mart
Tee-Pee Liquors
Tom's Luggage
U.S. Envelope (West Vacco)
V.R. Wesson/Fan Steel
Walgreens
Waukegan Bldg.
White Hen Pantry
Woolworths

Waukegan Disposal also transported residential waste to the YCL.

d. how such materials were used, purchased, generated, stored, treated, transported, disposed of or otherwise handled by you;

Response: Based upon interviews with individuals with knowledge as to the type of containers materials were contained in when they were hauled, most commercial waste materials were contained in one yard containers during the late 1950's and early 1960's. Larger two to four yard containers were used in the late 1960's. 55-gallon drums, barrels and 5-gallon pails and buckets were also used to contain materials. Residential waste was contained in 30-gallon metal containers. All materials transported were hauled in 13 and 17 yard garbage trucks. The method of disposal used at the YCL was open landfilling.

e. when such materials were used, purchased, generated, stored, transported, disposed of or otherwise handled by you;

Response: BFIIL has been unable to determine specific dates when materials were transported by Waukegan Disposal and National to the YCL. However, based on interviews conducted with persons with knowledge of the YCL era, Waukegan Disposal and National hauled waste to the YCL during much of its operative lifetime. BFIIL believes that National operated the YCL from 1959 to 1969.

f. where such materials were used, purchased, generated, stored, treated, transported, disposed of or otherwise handled by you;
and

Response: Based upon our investigation conducted to date, such materials mentioned in Response 1(a) were transported from customers within the City of Waukegan and North Chicago, Illinois to the YCL.

g. the quantity of such materials used, purchased generated, stored, treated, transported, disposed of or otherwise handled by you.

Response: Based on an interview with Mr. Marvin Powles, current District Manager with BFIIL's Waukegan District and formerly with National, in the late 1960's Marvin estimated that National transported to the YCL two 13-cubic yard truck loads per day from each residential route in Waukegan and North Chicago, Illinois. He estimated there were six residential routes. He added that two 17-cubic yard loads per day, from one commercial route was hauled to the YCL. Based on an interview with Mr. Ole Kirkegaard, current Sales Manager with BFIIL's Waukegan District and formerly with Waukegan Disposal, Mr. Kirkegaard estimated that Waukegan Disposal transported approximately 4 commercial loads and 2 residential loads on a daily basis to the YCL in the early 1960's. In the late 1960's, early 1970's, Mr. Kirkegaard estimated that 12 commercial loads and 16 residential loads were hauled to the YCL by Waukegan Disposal.

2. Describe the nature of the manufacturing and maintenance processes at your operation(s) from 1959 to 1969, including:

Response: BFIIL assumes this request is directed towards generators of waste, and therefore, is not applicable to BFIIL. Moreover, BFIIL has no information responsive to this request.

a. a description of all materials purchased for use in your operation(s) including the chemical identity and chemical composition of all identified and the supplier;

Response: Not applicable.

b. a description of all manufacturing processes that generated any by-products or wastes;

Response: Not applicable.

c. a description of all maintenance operation(s) that generated any by-products or wastes; and

Response: Not applicable.

d. a description of all products, by-products, and wastes generated.

Response: Not applicable.

3. Have you or any other person ever accepted materials for transportation to the Site from any person or transported materials to the Site? If the answer to this question is anything but an unequivocal no, identify:

Response: Waukegan Disposal and National, two predecessors-in-interest to BFIIL, have accepted materials for

transportation to the YCL site. Regarding other persons accepting materials, set forth in the response to Request 3(a) is a list of companies for whom they transported materials to the YCL site. All information below was obtained from interviews conducted with individuals with knowledge of the YCL era.

a. the persons from whom you or such other persons accepted materials for transport;

Response: Jensen Disposal Service
T-K City Disposal Corp.
Century Scavenger Service
City of Waukegan
North Shore Waste Control Company
Abbott Laboratories
A&A Disposal Services
Sisson Disposal
North Chicago Disposal
Libertyville Disposal

b. every date on which materials were so accepted or transported;

Response: BFIIIL has been unable to determine specific dates on which materials were accepted or transported to the YCL by the entities listed in the response to Request 3(a).

c. for each transaction or shipment, the nature of the materials including the chemical content, characteristics, physical state (e.g., solid, liquid), the process for which the substance was used or the process which generated the substance or whether the materials came from a construction project;

Response: BFIIIL has been unable to determine specific transaction dates on which materials were transported to the YCL. However, based on interviews conducted with individuals with knowledge of the YCL era the sources from which solid and liquid waste was hauled by National and Waukegan Disposal and the available information regarding the nature of such waste is given below.

Known commercial customers of National whose wastes were probably transported to the YCL include:

- o Abbott Laboratories (Abbott Park) - dock service to the cafeteria and laboratory buildings. The waste hauled consisted primarily of empty shipping crates, corrugated boxes and garbage. Some of the waste was picked up in dock containers, however most was loose material from the cafeteria and laboratory buildings. Marvin Powles specifically recalls one occasion in which while picking up waste from the laboratory, a live laboratory monkey was noticed within one of the shipping crates and was subsequently captured by AL employees and returned to the laboratory.

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- o American Hospital Supply Corp. (now Baxter Pharmaceuticals) - garbage only.
- o Anchor Hocking - glass bottles that didn't meet specifications on pallets and general rubbish.
- o Goodyear Tire & Rubber - primarily rejected rubber products, uncured rubber and general garbage.
- o J.C. Penney - garbage only.
- o Lakehurst Retail Stores - garbage only.
- o U.S. Steel/U.S. Cyclone - attached as Exhibit 5 are Purchase Orders with General Conditions attached from the U.S. Steel Corporation to National Disposal Service of Illinois for various periods during the 1960's. Individuals with knowledge of National's disposal practices during the periods covered by the P.O.'s, stated that U.S. Steel was hauled to the YCL. The nature and quantity of the materials hauled is not known.
- o Weibolts Retail Store - garbage only.
- o Zayre - garbage only.

National also transported residential waste to the YCL.

Known commercial customers of Waukegan Disposal whose wastes were probably transported to the YCL include:

Garbage Only

Ace Hardware
Belvidere Mall (approximately 30 stores)
Boren's Moving (storage warehouse)
J. Blumberg Furniture
Blumberg Appliance
Buehler's Food
Burkhardt's Bottle Shop (liquor store)
Cadillac Packaging (paper packaging company)
Caples Photo
Carriage House
Chandler's Office Supply
Chuck Hine's (men's clothing)
Chuck Wagon (restaurant)
Commercial Printers
Commonwealth Edison Company
Convenient Food Mart
Dom's Liquors
Dominicks
Eagle Food

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E.C.I. (Electronic Components, Inc.)
Feinberg's Men's Wear
Feldco-Major
Globe Store (retail store)
Glen Rock Beverage
Gold Standard Liquors
Gordons Auto
Grand Liquors
Haese's Food
Handi-Tap (molding company)
Harmony Haven (musical appliance retail)
Hein's (clothing)
Illinois Bell Telephone
Interstate Electric (electrical retail)
J. Meyer Co.
Jewel-Osco
K-Mart
Kalva Corp. (chocolate manufacturer)
King's Furniture
Lake County Movers
Lake County Press
Lake County Office Supply
Lake Shore Harley Davidson
Lanathon's (retail clothing)
Leath Furniture
Little Food Store
Little Fort Restaurant
Mordhorst Transfer & Storage
Musicland
Narrood Movers
National Biscuit (warehouse)
National Tea (supermarket)
Northern Illinois Warehouse
Open Pantry
Pfanstiehl (chemical packaging plant)
Pic-Way Shoes
Playback, Inc.
Polk Bros.
Potter Pharmacy
Quality Books
R&S Liquors
Chas. J. Sach's
Sample Furniture
Schiff Shoes
Scott's Bicycle
7-11 Food Store
Chicago Sun-Times
Taylor Furniture
Ted's Food Mart
Tee-Pee Liquors
Tom's Luggage

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Walgreens
Waukegan Bldg.
Waukegan Jack Donelson
Waukegan Marine
Waukegan Music Mart
White Hen Pantry
Woolworths

Garbage and Other Waste Materials

Larsen & Petersen Paint Store - paint in cans.

Midland Dexter - The exact nature of the waste materials hauled, quantity and time frame Midland Dexter's waste was hauled to the YCL is not known. However, Mr. Kirkegaard recalled hauling 55-gallon drums filled and sometimes half-filled with paint and solvents. He estimated the drums were hauled at a rate of approximately 20-30 per day to the YCL during the early 1960's.

Montgomery Ward - paint in cans.
Sears, Roebuck - paint in cans.
St. Theresa Hospital - ash.

Stone Container - five gallon pails 1/2 to 3/4 full of unknown material hauled on a daily basis.

U.S. Envelope (West Vacco) - paper, glue and ink in buckets hauled on a daily basis.

V.R. Wesson/Fan Steel - metal dust, shavings and wood.

Waukegan News Sun - waste ink.

Waukegan Disposal also transported residential waste to the YCL.

Information responsive to Request 3(c) regarding the entities listed in the response to Request 3(a) is listed below. This information is based upon interviews conducted with persons with knowledge of the YCL era.

Jensen Disposal Service - This company is owned by Mr. John Obenauf and was remembered by the individuals interviewed as having transported waste to the YCL. The nature, quantity and source of the material is unknown to BFIIL.

T-K City Disposal Corp. - T-K was owned by Henry Tewes and Peter Kirkegaard. Kirkegaard was the owner of Waukegan Disposal prior to merging with BFI. BFIIL believes T-K operated the YCL from early 1969 until the site reached its capacity and closed. T-K is also believed to have transported waste to the YCL. The nature, quantity

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and source of the material is unknown to BFIIL. T-K is believed to have been consolidated into Waste Management Inc.

Century Scavenger Service (CSS) - CSS was remembered by the individuals interviewed as having hauled waste for Outboard Marine Corporation during the YCL era. Marvin Powles recalled that CSS was based in Kenosha and occasionally, perhaps once per week, he would see a CSS truck at the YCL. Marvin stated that CSS's waste seemed oily.

City of Waukegan - Based on interviews conducted with individuals with knowledge during the YCL era, BFIIL believes the City of Waukegan hauled waste from their street sweeping operations to the YCL. The quantity and nature of this waste is unknown to BFIIL.

North Shore Waste Control Company (NSWC) - Based upon our investigation to date, NSWC acquired T-K City Disposal Corp. sometime around 1974. The nature and quantity of waste hauled by NSWC to the YCL is unknown to BFIIL.

Abbott Laboratories (AL) - AL is believed to have hauled their own garbage during the YCL era. See the Response to Requests 1(c) and 3(c) for additional information.

A&A Disposal Services - Based upon our investigation to date, A&A Disposal Services was owned by a man named Larson and A&A became North Shore Waste Control Company. At the time, Mr. Larson owned A&A, their waste is believed to have been transported to the Zion landfill in Zion, Illinois.

Sisson Disposal (SD) - Based on interviews conducted with individuals with knowledge during the YCL era SD, owned by Mr. John Sisson, was a one truck operation who hauled residential and commercial waste to the YCL. BFIIL has no knowledge as to the nature and quantity of waste hauled on the time frame the wastes were transported to the YCL.

North Chicago Disposal (NCD) - Based on interviews conducted with individuals with knowledge during the YCL era, NCD hauled waste into the YCL. NCD was operated by two men whose biggest contract was believed to be the Navy Center in North Chicago, Illinois. BFIIL has no knowledge as to the nature and quantity of waste hauled or the time frame the wastes were transported to the YCL.

Libertyville Disposal (LD) - Based upon interviews conducted with individuals with knowledge during the YCL era, LD hauled a commercial route into the YCL. BFIIL has no knowledge as to the nature and quantity of waste hauled or the time frame the wastes were transported to the YCL.

d. the owner of the materials so accepted or transported;

Response: See the response to Request 3(c).

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e. the quantity of the materials involved (weight or volume) in each transaction or shipment and the total quantity for all transactions or shipments;

Response: See the response to Request 1(g).

f. all tests or analysis and analytical results concerning each of the materials;

Response: BFTIL has been unable to locate documents regarding analysis of the materials described in the responses above.

g. the precise locations to which each material actually was transported;

Response: The materials described in the responses above are believed to have been transported to the YCL. Precise location is not known by BFTIL.

h. the person(s) who selected the Site as the place to which materials were to be transported;

Response: Exhibits 3 and 4 contain Agreements between BFTIL entities, the City of Waukegan, and the City of North Chicago which pertain to residential and commercial garbage collection and disposal. The Agreements with the City of Waukegan state that all garbage shall be disposed of by the sanitary landfill method at the present site in the City of Waukegan. The City of North Chicago Agreements state all garbage should be disposed of outside of the city limits of the City of North Chicago.

BFTIL has no information regarding who selected the YCL for commercial transactions.

i. the amount paid in connection with each transaction or shipment, the method of payment, and the identity of the person from whom payment was received;

Response: BFTIL has been unable to locate any document that can assist in identifying the amount paid in connection with each transaction, the method of payment or the identity of the person from whom payment was received. However, Exhibits 3 and 4 do reference amounts associated with disposal services.

j. where the person identified in i. above, intended to have such materials transported and all evidence of this intent;

Response: See the response to Request 3(i).

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k. whether the materials involved in each transaction or shipment were transshipped through, or were stored or held at, any intermediate Site prior to final treatment or disposal;

Response: BFIL has been unable to locate any information that is responsive to this Request.

l. what was done to the materials once they were brought to the Site;

Response: Materials brought to the YCL by BFIL were dumped from the truck, compacted by suitable heavy equipment, and covered daily with earth.

m. the final disposition of each of the materials involved in such transactions or shipments;

Response: See the response to Request 1(1).

n. the measures taken by you to determine the actual methods, means, and Site of treatment or disposal of the material involved in each transaction or shipment;

Response: During the period in which National operated the YCL, National was bound by the language of the contractual agreements with the City of Waukegan. Agreements within Exhibits 3 and 4 describe the measures taken by BFIL to ensure and determine that proper disposal methods were used.

o. the type and number of containers in which the material were contained when they were accepted for transport, and subsequently until they were deposited at the Site and all markings on such containers; and

Response: Based upon interviews with individuals with knowledge as to the type of containers materials were contained in when they were handled, most commercial waste materials during the relevant time period were contained in primarily one yard containers during the late 1950's and early 1960's. Larger two to four yard containers were used in the late 1960's. 55-gallon drums, barrels and 5-gallon pails and buckets were also used to contain materials. Residential waste was contained in 30-gallon metal containers.

The trucks used to transport the materials were generally 13 and 17 cubic yard trucks.

p. if the materials came from a construction or wrecking project, the location of the project, the type of project (e.g., dismantling of a building, road building, etc.), the type of materials (e.g., brick, wood, etc.), the type of insulation

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(e.g., asbestos, etc.), the type of metal and a description of any other material or waste.

Response: BFIL has no information responsive to this Request.

4. Identify all persons, including yourself, who may have arranged for disposal or treatment or arranged for transportation for disposal or treatment of materials at or to the Site. In addition, identify:

Response: Responses to Requests 4(a) through 4(o) have been provided within Requests 1, 2, and 3.

- a. the persons with whom you or such other persons made such arrangements;

Response: See the preamble to Request 4.

- b. every date on which such arrangements took place;

Response: See the preamble to Request 4.

- c. for each transaction, the nature of the materials including the chemical content, characteristics, physical state (e.g., solid, liquid), and the process for which the substance was used or the process which generated the substance;

Response: See the preamble to Request 4.

- d. the owner of the materials so disposed or treated;

Response: See the preamble to Request 4.

- e. the quantity of the materials involved (weight or volume) in each transaction and the total quantity for all transactions;

Response: See the preamble to Request 4.

- f. all tests or analysis and analytical results concerning each of the materials;

Response: See the preamble to Request 4.

- g. the precise locations at which each material actually was disposed or treated;

Response: See the preamble to Request 4.

- h. the person(s) who selected the Site as the place at which materials were to be disposed or treated;

Response: See the preamble to Request 4.

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i. the amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received;

Response: See the preamble to Request 4.

j. where the person identified in i. above, intended to have such materials treated or disposed and all evidence of this intent;

Response: See the preamble to Request 4.

k. whether the materials involved in each transaction were transshipped through, or were stored or held at any intermediate site prior to final treatment or disposal;

Response: See the preamble to Request 4.

l. what was done to the materials once they were brought to the Site;

Response: See the preamble to Request 4.

m. the final disposition of each of the materials involved in such transactions;

Response: See the preamble to Request 4.

n. the measures taken by you to determine the actual methods, means, and site of treatment or disposal of the materials involved in each transaction; and

Response: See the preamble to Request 4.

o. the type and number of containers in which the materials were contained when they were accepted for transport, and subsequently until they were deposited at the Site and all markings on such containers.

Response: See the preamble to Request 4.

5. Provide copies of all contracts, shipping documents, or other business documents including receipts relating to the transportation, storage and/or disposal of waste materials at the above referenced Site.

Response: All documents located by BFIL pertaining to transportation of materials possibly to the YCL are presented in Exhibits 3, 4, 5, 6, and 7. The documents within the exhibits are listed below.

Exhibit 3 - 1958 Contract Agreement between Barrington Trucking Company, National's Barrington, Illinois operations and the City of Waukegan for garbage collection and landfill operations.

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1959 and 1964 Contract Agreements between National Disposal Service of Illinois, Inc. and the City of Waukegan for garbage collection and landfill operations.

Exhibit 4 - Contract Agreements between Barrington Trucking Company, National Disposal Service of Illinois, Inc. and the City of North Chicago for garbage collection and disposal.

Exhibit 5 - U.S. Steel Corporation Purchase Orders for various periods during the YCL era.

Exhibit 6 - Indemnity Agreement dated July 31, 1964 between the Board of Education, Waukegan Township High School and National Disposal Service of Illinois, Inc.

Exhibit 7 - Security Agreement dated January 31, 1969 between the City of Waukegan and National Disposal Service, Inc.

6. Identify all liability insurance policies held by Respondent from 1959 to 1969. In identifying such policies, state:

Response: See attached as Exhibit 8, a list of insurance carriers that have issued insurance policies and which may provide coverage to BFTIL.

a. the name and address of each insurer and of the insured;

Response: See Exhibit 8.

b. the amount of coverage under each policy;

Response: See Exhibit 8.

c. the commencement and expiration dates for each policy;

Response: See Exhibit 8.

d. whether or not the policy contains a "pollution exclusion" clause; and

Response: See Exhibit 8.

e. whether or not the policy covers sudden, non-sudden or both types of accidents.

Response: See Exhibit 8.

7. Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last five years.

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Response: BFIIIL does not file a separate income tax return. Information on the parent's consolidated return would not break out specific information regarding BFIIIL.

8. Provide all financial statements for the past five fiscal years, including but not limited to those filed with the Federal and State Internal Revenue Service and Securities and Exchange Commission.

Response: Exhibit 9 contains Browning-Ferris Industries, Inc.'s Form 10-K's submitted to the Securities and Exchange Commission dated September 30 for each of the five preceding fiscal years.

9. Identify all of Respondent's current assets and liabilities and the person(s) who currently own or are responsible for such assets and liabilities.

Response: Exhibit 10 contains Browning-Ferris Industries, Inc. Annual Reports for each of the five preceding years.

10. Identify all subsidiaries and parent corporations of Respondent.

Response: BFIIIL is a wholly owned subsidiary of Browning-Ferris Industries, Inc. (Delaware).

11. Provide a copy of the most current Articles of Incorporation and by-laws of Respondent.

Response: Exhibit 11 contains BFIIIL's most current Articles of Incorporation and By-laws.

12. Identify the managers and majority shareholders of Respondent and the nature of their management duties or amount of shares held, respectively.

Response: The sole shareholder of BFIIIL is Browning-Ferris Industries, Inc., a Delaware Corporation.

13. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any questions contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Response: See Exhibit 5.

14. For each and every question contained herein, if information or documents responsive to this Information Request are not in your possession, custody or control, then identify the persons from whom such information or documents may be obtained.

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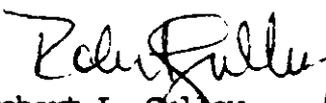
Response: Based upon BFIIIL's investigation to date, no information or documents responsive to this Request exists that are not in BFIIIL's possession. Should documents be discovered, subsequent to our submittal of this Response, such documents will be submitted to the USEPA.

BFIIIL has conducted a diligent search for all available documents and records in preparing its Response to this Request. In addition, BFIIIL interviewed many individuals with knowledge of disposal practices during the relevant time period in which the YCL was operational. In the future, if additional information is discovered which supplements or modifies any of the responses, BFIIIL will voluntarily provide that information to the United States Environmental Protection Agency (USEPA).

Should you have any questions regarding this Response, please contact me at 713/870-7010.

Sincerely,

on behalf of Browning-Ferris
Industries of Illinois, Inc.


Robert L. Gulley

Enclosure