

1301 East Ninth Street
Suite 3600
Cleveland, Ohio 44114-9224

216-589-3000
Facsimile 216-589-4109-4247
Telex 980562 980688

M.A.HannaCompany

August 23, 1989

VIA EXPRESS MAIL

Mr. Eric Newman (3 HW 25)
U. S. Environmental Protection Agency
Region III
DE/MD Section
841 Chestnut Building
Philadelphia, PA 19107

Dear Mr. Newman:

This letter is in response to the Request for Information Pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. §9604(e), amended by the Superfund Amendments and Reauthorization Act of 1986, PL 99-499 ("CERCLA") and Section 3007 of Resource Conservation and Recovery Act, 42 U.S.C §3007 ("RCRA") dated August 2, 1989 to M. A. Hanna Company in connection with Electric Hose and Rubber Company. Hanna is responding to this request as successor in interest to certain obligations of Electric Hose and Rubber Company.

As a preliminary matter, Hanna objects to this Request on the grounds, among others, that the (a) Environmental Protection Agency has not established that Section 3007 of RCRA applies to Hanna under the circumstances of this matter; and (b) the instructions, definitions and questions of such Request are overly broad, unduly burdensome and exceed the authority of Section 104 (e) of CERCLA

Without waiving or in any way limiting any objection it has or may have to this Request, Hanna provides the information set forth below and attached hereto. The search for information has proved to be difficult because of Hanna's position as a successor in interest to certain liabilities of Electric Hose and Rubber Company. Hanna acquired Day International Corporation, (formerly Dayco Corporation) in 1987. Day International had acquired Electric Hose and Rubber Company in 1978 and shortly thereafter

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closed the Electric Hose and Rubber's Wilmington, Delaware facility and moved it to Ocala, Florida. In 1986, Day sold Electric Hose and Rubber to Armstrong Rubber.

In preparation of this response, Hanna relied upon interviews conducted with past employees (see list set forth as answer to question 14) and intends to attempt to locate files, if any are obtainable, regarding this Request. Hanna will supplement this response with additional relevant information should it be uncovered or otherwise be made available. The answers set forth below correspond to the numbered questions in the Request.

1. Cardboard, paper, fabric - rayon and very small amounts of scrap rubber. No quantities are known.
2. Solid wastes as described in #1, above, were generated. No information is available on the storage of these wastes.
3. All wastes were destroyed in an on-site incinerator.
4. No information is available on whether or not the wastes were separated.
5. See answer to #3, above.
6. See answer to #3, above.
7. No information is available.
8. There were no waste hauling contracts. See answer to #3, above.
9. No correspondence discovered.
10. No documents discovered.
11. No information available.
12. Other than in connection with this Request for Information, no correspondence discovered.
13. No information available.

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14. The following individuals may have information:

- i. Joseph Lanci (302) 655-3184
2110 Spruce Street
Wilmington, DE 19802
Retired foreman of Wilmington plant
- ii. Charles Culver (904) 622-9221
Address unknown
Former Senior Vice President,
Sales and Marketing
- iii. Frederick Sanford (904) 677-1058
Address unknown
Former Vice President,
Administration and Finance

Finally, attached hereto as Exhibit A, is a listing of insurance policies which were in place for Electric Hose and Rubber Company during the years covered by the Request. Because of the time elapsed since these policies were in place, I was unable to readily uncover any copies. This submission will be supplemented at such time as I am able to obtain copies of the policies.

If you require any additional information, please do not hesitate to call me.

Very truly yours,


Valerie A. Gentile

VAG/eac

Attachment

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EXHIBIT "A"

GENERAL LIABILITY

05-25-64/67	LPI 131-012069-044	Liberty Mutual Insurance Company
08/01/68-69	LGI 131-012069-078-TD23	Liberty Mutual Insurance Company

UMBRELLA

05/25/64-67	XBC 2643	Liberty Mutual Insurance Company
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COMPREHENSIVE LIABILITY

06-30-67/68	LP 130 1800	Fireman's Fund
06-30-68/69	LP 130 1801	Fireman's Fund
06-30-69-70	LP 130 3622	Fireman's Fund

EXCESS UMBRELLA LIABILITY

06-30-67	CU 5968	Lloyd's of London
06-30-69/?	RD9397865	Continental Casualty Company

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