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September 3, 2004

Mr. Harry Steinmetz (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Re: UGI Columbia Gas Plant Site
Columbia, Pennsylvania

Dear Mr. Steinmetz:

UGI Utilities, Inc. received a letter on August 5, 2004 from Ms. Joan Armstrong of your office requiring production of information pursuant to CERCLA §104(e) for the Columbia former manufactured gas plant site. The letter contained fifteen information requests, which are answered below.

Request 1 – dates of ownership

The Lancaster County Gas Company purchased the property from the Pennsylvania Power & Light Company (PP&L) on February 28, 1949. The Lancaster County Gas Company was a subsidiary of The United Gas Improvement Company that merged into The United Gas Improvement Company on December 31, 1952. A section of the property was sold to Mr. & Mrs. Carlin in 1967. The remainder of the property was sold to Mr. and Mrs. Thomas Crouse in 1976.

Request 2 – dates and nature of operation

From February 28, 1949 to approximately 1950, the Lancaster County Gas Company operated the Facility as a propane/air plant as described below.

Neither the Lancaster County Gas Company nor The United Gas Improvement Company manufactured gas at the site.

Request 3 – documentation of any interest in real property

Enclosed is a copy of the deed for purchase of the property by the Lancaster County Gas Company (grantee) from Pennsylvania Power & Light Company (grantor).

The property was sold in two sections as follows:

Sale of one section of the property by UGI (grantor) to Mr. & Mrs. Carlin (grantees) in 1967 and

Sale of the remainder of the property by UGI (grantor) to Mr. & Mrs. Crouse (grantees) in 1976.

Copies of the deeds to the Carlins and Crouses are not available in the documentation retained by UGI.

Request 4 – owner who sold the property to UGI

The property was purchased from PP&L, which is now doing business as PPL Electric Utilities Corporation. The address is: Two North Ninth Street, Allentown, PA 18101-1179. The telephone number is: 610 774-5151.

Request 5 – description of business operations at the time of UGI's purchase

The Facility was used to provide regulated gas service to the public. Manufactured gas operations at the site ceased prior to the Lancaster County Gas Company's purchase of the Facility in 1949. At the time of purchase, the Facility consisted of a propane/air production plant. During the period between 1949 and 1950, the Lancaster County Gas Company used the Facility to supply a propane/air mixture to its gas distribution system as a substitute for gas manufactured from coal. The propane/air plant was decommissioned at an undocumented time in 1949 or 1950.

Request 6 – identify types and quantities of hazardous substances, pollutants and contaminants used at and/or sent to the Facility

Neither UGI nor the Lancaster County Gas Company used or sent hazardous substances, pollutants, or contaminants to the Facility.

Coal tar produced during prior manufactured gas plant operations was present on the site when the property was purchased. The report "Contaminant Identification, Delineation, and Impacted Soils Volume Estimation – Former UGI Columbia Gas Plant" submitted to Mr. Steve Donahue, EPA Region III, in June 1998 contains analyses of materials responsive to Question 6. The report also contains the best estimate of the quantity of material at the site and in the vicinity. The report is reproduced on the enclosed CD on pages 690335 through 690825.

Request 7 – provide the date(s) of use for substances identified in Question 6

Neither UGI nor the Lancaster County Gas Company used or sent hazardous substances, pollutants, or contaminants to the Facility.

Request 8 – describe the state (liquid, solid, or gaseous) of the substances identified in Request 6 and the manner of storage and disposal

Neither UGI nor the Lancaster Gas Company used or sent hazardous substances, pollutants, or contaminants to the Facility nor did they store or dispose of such substances at the Facility.

Request 9 – provide any correspondence or documents between UGI and any regulatory agency regarding the substances identified in Question 6

Responsive documents are provided on the enclosed CD.

Request 10 – provide any correspondence between UGI and any third party regarding the substances identified in Question 6

Responsive documents are provided on the enclosed CD.

Request 11 – provide the identity of, and documents relating to, anyone else who caused the substances identified in Question 6 to be present at the Facility

To UGI's knowledge, the only entity known to have operated the Facility when the substances identified in Question 6 were produced was PPL and its predecessor companies. Responsive documents are provided on the enclosed CD.

Request 12 – provide the period of time UGI was involved in production and manufacture of natural gas at the Facility

UGI did not produce or manufacture natural gas at the Facility.

Request 13 – provide a complete corporate genealogy including Department of State documents

UGI Utilities, Inc. began its corporate existence as The United Gas Improvement Company, formed by a merger and consolidation of two corporations in 1925. See attached Index and Docket Record of the Pennsylvania Department of State, Corporation Bureau. In 1968, the company changed its name from The United Gas Improvement Company to UGI Corporation. See attached Certificate of Amendment dated June 3, 1968. As part of a corporate restructuring in 1992, the company changed its name to UGI Utilities, Inc. and a newly formed entity assumed the name UGI Corporation. See attached Articles of Amendment for New UGI Corporation (to be renamed "UGI

Corporation”) and Articles of Merger for UGI Corporation (name to be changed to “UGI Utilities, Inc.”).

Request 14 – explain the relationship between UGI and the Lancaster Gas Company including Department of State documents

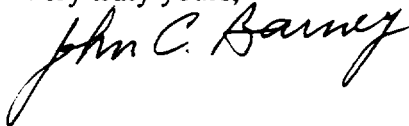
Prior to 1953, The United Gas Improvement Company was a holding company, one of whose subsidiaries was the Lancaster County Gas Company. On December 31, 1952 the Lancaster County Gas Company, along with a number of other Pennsylvania subsidiaries, merged into The United Gas Improvement Company, which became an operating public utility authorized to render gas and electric service to the public in the service territories of its former subsidiaries. See attached Certificate of Merger and Merger Agreement.

Request 15 – how long did Lancaster Gas operate the Facility and what was the nature of the operation?

The Lancaster County Gas Company operated the Facility between February 28, 1949 and December 31, 1952. The nature of the operation was distribution of a propane/air mixture produced at the Facility using the propane/air plant that was present when the property was purchased. Following connection to an interstate natural gas transmission pipeline, the propane/air plant was decommissioned and natural gas was supplied to the distribution system.

If you have any questions regarding the information provided, please contact J C. Rondeau at 610-796-3532.

Very truly yours,



Cc: R.J. Chaney
P.G. Terranova
T.M. Jackal
J.C. Rondeau