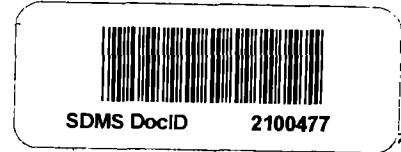




CENTRAL CHEMICAL CORPORATION

~~49 NORTH JONATHAN ST., P.O. BOX 918~~
HAGERSTOWN, MARYLAND 21740



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January 14, 1992

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HSWMA
ENFORCEMENT PROGRAM

Mr. Richard Johnson
Maryland Department of the Environment
Hazardous and Solid Waste Management Administration
2500 Broening Highway
Baltimore, Maryland 21224

Re: Central Chemical Corporation/Request for
Information Pursuant to Environmental
Code Article, §7-221(f)

Dear Mr. Johnson:

Central Chemical Corporation hereby acknowledges its counsel's receipt on December 2, 1991 of your letter of November 29, 1991. Central understands from a follow-up letter its counsel received from Assistant Attorney General, Pamela Marks, a copy of which is attached hereto as Exhibit A, that the information request was intended to be submitted to Central Chemical Corporation. The following responses are provided as if the request had been submitted to Central Chemical Corporation.

The following information is supplied in response to your specific requests. This information has been obtained from consultation with the following present or former employees, officers and/or directors of Central Chemical Corporation: David Schwartz, President, Central Chemical Corporation; Joseph Spillman, Vice President, Central Chemical Corporation; Andrew Peltz, formerly a Foreman of Central Chemical Corporation, 2314 Laurel Drive, Hagerstown, Maryland, 21740; Franklin M. Thomas, Jr., former President of Central Chemical Corporation 1400 Haven Road, Hagerstown, Maryland, 21742.

1. Describe Central Chemical Corporation's (CCC's) operations at the Site from CCC's initial use until present. If CCC's operation changed through time, then describe the applicable time period for each operation.

PLANTS AT • SANDUNE, TEXAS • HAGERSTOWN, MD. • ELKTON, MD.

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Answer: Central Chemical Corporation ("Central") has owned property located at Mitchell Avenue which is the subject of your investigation since 1937. We do not understand your inquiry to ask Central to give a day-by-day description of the use of the property for a 54 year period. We have inquired of Central's current employees and, to the extent identifiable, former employees as to the uses of the property that have been made over the years and have set forth below a description of such uses. These uses have been as follows:

(a) Fertilizer operations:

During the period between 1937 and the early 1980's, Central operated a fertilizer plant on the site. Central produced commercial grade fertilizer at the facility which was sold directly to farmers, to distributors and to other chemical companies for distribution. For use in the production of fertilizer, Central received by rail and by truck various fertilizer grades of nitrogen, phosphorus and pot ash. These materials were stored in bulk storage bins, then mixed in various ratios (recipes) and sold in packaged bags or in bulk to farmers or retail distributors. To the extent that Central marketed the product for itself, the products were distributed using Central's trade name - Farmrite. The packaged or bulk fertilizer products were shipped off-site primarily by truck and occasionally by rail. Fertilizers were produced in one particular building on the site which is identified on various drawings as the fertilizer plant. This building, it is believed, was used by Central solely for fertilizer production as described above. Several years ago, a warehouse portion of this building was rented to a recycler for use in recycling paper. That use continues to the present day.

(b) Formulation and sale of agricultural chemicals:

As far as Central can reconstruct from the recollections of current and former employees, beginning sometime in the 1940's and continuing until approximately 1965, Central ground, formulated and packaged various agricultural chemicals on site. Many of these chemicals, which are more fully identified below, including DDT and Sevin, were formulated using an air milling process. For example, technical grade DDT would be received from a number of different companies for whom Central did custom work and formulated to the exact specifications supplied. The mixtures were then air milled by forcing the mixtures through a mill, the effect of which was to produce a finer, particulate product which could be sprayed through a spray nozzle. This process of formulating, grinding and packaging such agricultural chemicals continued from some time in the 1940's until approximately 1965 when a fire destroyed the building in which this activity occurred. In addition to the actual formulation of agricultural chemicals, Central also used several different buildings on the site to store packaged

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agricultural chemicals, which were purchased from various suppliers and sold to farmers and/or retail dealers in the packages in which they were purchased.

During the period between the mid 1940's and the mid 1950's, Central is believed to have ground sulfur in a roller type mill which was contained in the concrete block building in the southwest corner of the property. Central also produced a product called lime sulfur solution which was produced by boiling lime and sulfur together and then packaging the liquid which was sold as a finished product. This process is believed to have occurred during the period between the mid 1940's and the mid 1950's in the building formerly located at the south west portion of the property. The building was metal clad and has deteriorated over a long period of years.

In addition to the foregoing agricultural fertilizer and chemical operations, Central also produced steam on site by using a coal fire burner in the building located on the western edge of the property. The boiler used for this process is no longer on the property. Central also operated a repair and maintenance shop in a building located on the northern portion of the property. That activity is believed to have ceased in the late 1970's.

The buildings which remain on the site are now rented to various users.

2. Describe products produced and services provided throughout CCC's operation of the Site. If CCC's products or services changed through time, then describe the applicable time period for each product or service. Also describe the physical state of materials used in these processes (i.e., solid, liquid, etc.).

Answer: (a) Agricultural fertilizer operation:

Central produced agricultural fertilizer containing Nitrogen, Phosphorous and Potash at the Mitchell Avenue site. The materials used in the production of such fertilizer products were solid with the exception that portions of the nitrogen and/or phosphorus may have been introduced in a liquid state into the process.

(b) Agricultural chemicals:

The following agricultural chemicals were formulated, ground and packaged by Central at the site during the time period indicated. To the extent possible, Central has attempted to

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reconstruct periods of production of each chemical (periods of production shown are estimates).

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<u>CHEMICAL NAME</u>	<u>PERIOD OF FORMULATION</u>
1. DDT	Late 1940's to mid 1960's
2. BHC	Early 1950's
3. Omite	Early 1960's
4. Sevin	1960 to 1965
5. Methoxychlor	1950's and early 1960's
6. Aldrin	1950's and early 1960's
7. Dieldrin	1950's and early 1960's
8. Rotenone	1940's and 1950's
9. Dyrene	Early 1960's
10. Lime Sulfur Solution	1940's and early 1950's
11. Guthion	Early 1960's

As noted above, the formulation of these products involved the air milling or grinding of technical grade raw material which may have been mixed with inert materials. The raw material typically was solid, although water or steam may have been mixed with the technical grade material when grinding and milling the material. Most products, with the exception of lime sulfur, would have been bagged or otherwise packaged for shipment off-site in a solid state. Some small quantity of various products may have been dissolved in water or some other liquid and packaged and sold in that form.

3. Please explain Central Chemical Corporation's documentation procedures (including, but not limited to, its productions shipping and receiving, waste generation and disposal and contracting). In your answer, please identify all document repositories, both past and present. If your response varies based upon different time frames, or area of the business, please identify and describe all of those variations.

Answer: Central operated from a rented General Office at 49 North Jonathan Street, Hagerstown, Maryland until July 1990 when it moved to 1835 Pennsylvania Avenue, Hagerstown, Maryland. All types of corporate records were stored in the basement of 49 North

Jonathan Street until some time in the late 1970's or early 1980's when shelving was constructed in a building at the Mitchell Avenue site. Records were separated by year, transported to the site and stored on the shelves. In the early to mid 1980's, the building was vandalized along with other buildings at the location and boxes of records were strewn on the floor of the building. Several days later, the building was destroyed by fire which also consumed the records. The records which exist for periods of Central's operation are records which were overlooked when record storage was moved. Central has previously provided to MDE such records as it continues to possess relating to its formulation of agricultural chemicals.

Although Central management cannot say with certainty, the following are the types or categories of records Central possessed which were destroyed by the fire.

- a) Manufacturing Reports;
- b) Shift Reports/Time Cards - Figured daily and reported on MR's and Time Sheets;
- c) Receiving Reports;
- d) Bills of Ladings - These were filled out when shipping a product;
- e) Weekly production reports;
- f) Monthly Production Reports - Inventories taken on all products on hand, then typed onto inventory sheets;
- g) Attendance Cards - employees hours entered on a weekly basis;
- h) Lab Samples;
- i) Payroll - Figure employees hours and rate or pay per shift;
- j) Lab Analyses.

4. Identify all corporations or other business entities or persons that CCC provided products or services to and describe any and all business relationships CCC has had with these business entities.

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Answer: In the fertilizer operation, Central purchased various raw materials from basic producers or brokers and sold the finished products to farmers and dealers.

In the distribution of agricultural chemicals, which were sold under the same label and in the same package as they were purchased, these products would have been purchased from various basic producers.

In both of the above operations, sales to farmers and dealers would be virtually impossible to document with any certainty. Any farmer, home gardener or lawn owner within a fifty mile radius would be a possible customer. No one now identified by Central would be able to identify who these customers might be during the periods in question.

With regard to Central's formulation, grinding and packaging of agricultural chemicals, very small amounts of this material was sold under a Central label and would have gone to customers as described in the first three paragraphs above. The vast majority of this operation was believed to be custom processing of the products described in the answer to question 2, paragraph 2. Of those products, it is believed that the formulation of DDT for world-wide malaria control represented the most volume by far.

We believe DDT was provided to the operation by Geigy Chemical (now Ciba-Geigy), Olin Mathieson (now Olin Corporation), FMC Corporation, (perhaps Niagra Chemical at the time), Diamond Shamrock (perhaps Diamond Alkali at the time), Allied Chemical, Montrose Chemical, Penn Salt Company, Lebanon Chemical and Stauffer Chemical. Finished products were sold following inspection by U.S. State Department. Central believes these products were sold through the United Nations or the U.S. State Department. Central has provided to MDE those records which Central possesses relating to its pesticide formulation operation.

In most cases, the organization providing the DDT contracted with Central to formulate the DDT for them and Central would be paid a formulation fee, while title to the product remained in the ownership of the provider. In some cases, Central purchased the DDT from one of the organizations shown as providing DDT and sold the finished product to the United Nations or the United States State Department. In most, if not all instances, the finished product was provided to the United Nations or the United States State Department for use in malaria control programs in underdeveloped countries.

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BHC, Methoxychlor, Aldrin, Dieldrin and Rotenone are believed to have been formulated for the organizations which provided these products to Central. Shell Chemical may have supplied some of these products.

Omite is believed to have been produced for Uniroyal Chemical.

Dyrene is believed to have been produced for Mobay Chemical.

Lime Sulfur Solution is believed to have been produced by Central to sell to Central's farmer customers.

Central also may have received agricultural chemical products for distribution from the following companies: Eli Lilly Company (and its Elanco Division), Am Chem, UpJohn and, we believe, Dow Chemical.

5. For each business entity or person identified in paragraph 3, identify the products or types of services CCC provided.

Answer: See Answer to Question No. 4.

6. For each business entity or person identified in paragraph 3, identify, by name and current address, all persons who may have knowledge of this business relationship.

Answer: The following present or former employees of Central may have knowledge of one or more of the foregoing business relationships.

Andrew Peltz, 2314 Laurel Drive, Hagerstown, Maryland, 21740;

Robert E. Weaver, 2750 Virginia Avenue, Williamsport, Maryland 21795;

W. Thackara Brown, 2750 Virginia Avenue, Williamsport, Maryland, 21795;

Samual Marshall, current address unknown; was last known to be in Lake Charles, LA;

Franklin M. Thomas, Jr., 1400 Haven Road, Hagerstown, Maryland, 21742

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David Schwartz, 1835 Pennsylvania Avenue, Hagerstown,
Maryland, 21740

Joseph Spillman, 1835 Pennsylvania Avenue, Hagerstown,
Maryland 21740

There may be various persons associated with business entities identified above who have knowledge of business relationships between Central and those entities. No one associated with Central at this time can identify any such person.

7. Unless already provided by CCC or its attorneys to Maryland Department of the Environment by letter of August 23, 1991, provide all documents that relate to a business relationship with the entities identified in Paragraph 3, including, but not limited to, contracts, sales agreements, consignment agreements, storage agreements and shipping agreements.

Answer: Central believes that it has produced to MDE all documents it possesses which are responsive to Request No. 7. Central and its counsel would be happy to provide a representative of MDE access to the original of all such documents if MDE desires an opportunity to review the originals of the documents.

8. Identify and describe the physical state of all waste, including, but not limited to, spillage, off-specification products, allowable losses, and production by-products which were generated, received, stored or disposed of at the Site.

Answer: Central objects to this request to the extent that MDE in its question uses the term "waste" as that term may be utilized in the Resource Conservation and Recovery Act, regulations promulgated thereunder, or any State law governing the handling, transportation or disposition of solid waste and hazardous waste. At the time of production of the materials as to which information is sought by MDE, these statutes and regulations did not exist. As such, Central's response to this request should not be construed as acknowledging that Central generated, transported or disposed of any material regulated by those statutes or regulations at the site. Central, therefore, in answering this question in using the term "waste" will mean only any spillage, raw materials or formulated material, off specification products, allowable losses, and production by-products. As so defined, Central states that it is not aware of any waste which was generated by the fertilizer operation and transported from the site or disposed of on site.

With regard to the agricultural chemical operation, Central states that some of the technical grade raw materials which were received by Central Chemical were received in multi-wall paper

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bags. Once those paper bags had been emptied, the bags constituted a "waste". Other "waste" would include dust swept from the floors of the grinding and air milling buildings and materials steam cleaned off the equipment used in the grinding or milling operations. Central personnel cannot recall any instances in which any product was determined to be off specification and then designated as waste. A former employee of Central, Earl Faith, however has testified about this in deposition in litigation including Central and Milcar Construction Company. Mr. Faith's deposition can be made available to MDE. The finished agricultural chemical product, especially DDT, typically was tested by inspectors from the United Nations or from the United States State Department. If the product did not meet specifications, Central would re-formulate the product to meet specifications. Central has no knowledge of the receipt of any products or materials which were disposed of on the site as wastes.

9. For each waste described in Paragraph 7, describe the process by which the waste was generated or received, the quantity that was generated or received, and, if applicable, identify from whom such waste was received. If CCC's practices varied through time, identify and describe each practice and the time periods during which they occurred.

Answer: See Answer to Question No. 8. Waste was not received from other parties. Waste occurred from cleaning equipment and cleaning floors and buildings. In addition, once raw materials were emptied from paper bags, the bags would have been waste.

10. For each waste described in Paragraph 7, describe how CCC stored, treated and/or disposed of the waste. If CCC's practices varied through time, identify and describe each practice and the time periods during which they occurred.

Answer: Central believes that the empty paper bags and sweepings and other material steam cleaned from the air mill and grinding mill were deposited in a location on the site which has been identified in the Weston report submitted to MDE as the quarry, near the northwest corner of Central's property. This quarry or hole is of unknown origin. It is believed that paper bags, once the materials were emptied for use in the production process, would be collected and deposited in the quarry. It is also believed that the sweepings from the floor and materials steam-cleaned from the air mill and grinding mills were forced under pressure through a pipe to the location of the quarry. Central is unable to say precisely during what period this occurred, but it is believed that each of these activities occurred

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during the period between sometime in the late 1940's and approximately 1965.

Earl Faith has testified in his deposition about the burying of materials in trenches. His deposition can be provided to MDE. Central is unable to confirm from other sources that this occurred.

11. For all waste that was discharged, spilled, emitted or buried on the Site, describe as precisely as possible the location on the property, the methods of discharge, spillage, emitting or burying such waste, the quantity placed in or on the Site and identify all persons who may have knowledge of such practices, incidents, or locations.

Answer: See response to Question No. 10. Central is unable to estimate the amount of material that may have been placed in the quarry as reflected in response to Question 10. The persons who may have knowledge of such practices are those current and former Central employees identified in Answer to Question No. 6. A former employee named Earl Faith also has provided certain information to the Maryland Department of the Environment and also has testified in deposition regarding disposal of materials on site. Current and former Central employees, other than Mr. Faith, do not corroborate his recollections, except as set forth above.

12. Identify and describe the activities conducted in each of the buildings at the Site. Include buildings which are currently not used and buildings which no longer exist. If the use of the buildings varied with time, identify the uses and the corresponding time periods.

Answer: Central is unable to say with certainty when some of the buildings were constructed and to identify all uses which may have been made of each building over the years. The information Central is able to provide is as follows:

On entering property, first building on left -- fertilizer plant until early 1980's, then idle. Since about 1989, the warehouse portion of the building has been used by an entity renting the building to recycle paper.

Next on left -- Butler type building -- used to unload bagged chemicals from rail cars, used to store packaged chemicals (from construction to 1970's), used to store rolls of paper (1980's), used to store aluminum bars (1980's), used to repair automobiles (1990-91) and used for a sawmill (1991).

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Next on left -- Shed -- used to unload bagged chemicals (1940's, 1950's, early 1960's) from rail cars, used to store packaged chemicals, used to store various industrial products (1980's) used to store antique cars (1991) and to repair same.

Next on left -- concrete block building -- used to unload bagged chemicals from rail cars, (1940's, 1950's, early 1960's) used to store packaged products, used to store various industrial products (1980's and 1990 and 1991).

Next on left -- former metal clad building -- no longer on site -- used to produce lime and sulfur solution (1940's to mid 1950's).

To right of lime sulfur building -- Building contained a coal fired boiler and produced steam (1950's and early 1960's) -- used to repair truck trailers -- used to repair cars (1990 and 1991).

Next -- several concrete pads -- used for air compressors and air driven grinding mills -- Area where formulation and grinding of products was performed. Also used for storage of empty containers. (Buildings probably built in 1950's and used until fire in 1965).

Next -- two small buildings -- used to store supplies and as a lunch room (1950's, 1960's).

Next -- site of former plant office and analytical laboratory (1950's until 1960). Used later as record storage (1980's).

Next -- Warehouse used to store packaged products (1950's, 1960's, 1970's).

Next to North -- repair shop (1950's, 1960's, 1970's) -- used for parts storage (1990).

Next -- shower rooms (1950's and 1960's), garage (1990/1991).

13. Identify any methods used to decrease dust levels in the buildings at the site (i.e. baghouses)? If any what was done with the collected dust?

Answer: In an air milling operation, the finished product was fine enough to pass through a spray nozzle. This finished product was collected from the mixers and mills because it

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was fine enough to be collected by a dust collector. The dust collectors discharged their product into finished product packages.

14. Describe any and all remediation or removal activities taken at the Site.

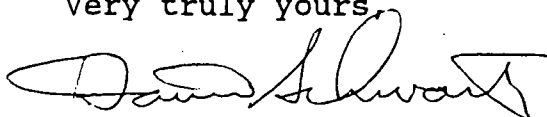
Answer: Central is unsure as to whether this question seeks access to information concerning the investigation by the Maryland Water Resources Administration in 1977-79 regarding Central's property. MDE's files, which Central has obtained access to through requests under the Maryland Information Act, contain extensive documentation regarding various administrative orders issued by the Water Resources Administration, environmental investigation undertaken by Central in cooperation with the Water Resources Administration and remedial actions taken by Central under the direction of the Water Resources Administration during that period which resulted in a notice of compliance issued by the Water Resources Administration in December, 1979. All of this information is in the possession of MDE and, as a consequence, Central does not understand your inquiry to seek access to this information. MDE also is aware of the investigation undertaken by Central following the disturbance of Central's property by Milcar Construction Company in March, 1987, including the environmental investigation undertaken by Central utilizing the services of the Roy F. Weston Company. There is no other information which Central possesses which is responsive to this request.

15. Identify all owners of every portion of the Site from the beginning of CCC's operations to the present, and specify the time period and nature of such ownership interest.

Answer: In response to Question No. 15, Central has attached as Exhibit B hereto a copy of a Deed by which it acquired the site in 1937. Central has owned the site continuously and uninterruptedly since that date with the exception of a one acre parcel which the City of Hagerstown purchased to build an electrical substation. A copy of the Deed conveying that parcel to the City of Hagerstown is attached hereto as Exhibit C.

Central is continuing to investigate your requests for information and will supplement this response if additional information is identified.

Very truly yours,



David Schwartz

DS/clc
cc: Thomas E. Lynch, III

CEN-0203929

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ASSISTANT ATTORNEYS GENERAL

December 6, 1991

Thomas E. Lynch, III, Esquire
Miles & Stockbridge
30 West Patrick Street
Frederick, Maryland 21701

Re: Central Chemical Corporation

Dear Tom:

As we discussed on December 4, 1991, the information request sent to you regarding the Central Chemical site was intended for Central Chemical Corporation. The letter was mailed to you as Central Chemical's attorney, rather than to you individually.

I hope this resolves any confusion and I appreciate your contacting me for clarification.

Sincerely,

Pamela D. Marks
Assistant Attorney General

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EXHIBIT A

CEN-023930
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EX. (\$30.00 REV. STAMPS)

At the request of CENTRAL CHEMICAL CORPORATION OF MARYLAND, this DEED was recorded May 14th 1937, at 3:20 o'clock P. M.

Deed to Central Chemical Corporation
May 14, 1937

THIS DEED, made this 12th. day of May, A.D. 1937, by Franklin M. Thomas and Grace Howard Thomas, his wife, both of Washington County, State of Maryland; WITNESSETH: That for and in consideration of the sum of TEN DOLLARS, (\$10.00) cash in hand paid, and other good and valuable considerations, the receipt of all of which is hereby acknowledged, we, the said Franklin M. Thomas, and Grace Howard Thomas his wife, do hereby grant and convey unto CENTRAL CHEMICAL CORPORATION OF MARYLAND, a corporation, duly incorporated under the laws of the State of Maryland, its successors and assigns, forever, in fee simple, together with all of the improvements thereon, and all of the rights, privileges, ways and appurtenances thereunto belonging, or in anywise appertaining, all of the following described property and parcels of land, situate, lying and being in Washington County, State of Maryland, and being more particularly described as follows:

PARCEL NO. 1: Being lots numbers Two hundred fifty-nine (259) to Two hundred ninety-four (294), both inclusive, and lots numbers Three hundred fifty-nine (359) to Four hundred and eleven (411) both inclusive, as all of said Lots are shown and designated on the plat of Hager Heights and the Citizens Development Company, of Hagerstown, Washington County, formerly as a part of the property of the said Citizens Development Company of Hagerstown, Washington County, which said plat is duly recorded in Plat Record folio 220, one of the Land Record Books in the office of the Clerk of the Circuit Court for Washington County, Maryland; said lots being bounded on the northeast side thereof by the right of way of the Cumberland Valley Division of the Pennsylvania Railroad Company, and on the Northwest side thereof by Stratford Avenue, on the Southwest side thereof by Florida Avenue, and on the Southeast side thereof by Linganore Avenue; all in the city of Hagerstown, Washington County, State of Maryland.

PARCEL No. 2. - Together with all the right, title, interest, claim, demand and estate which the said Franklin M. Thomas and Grace Howard Thomas, his wife, have in and to that portion of Alabama Avenue as shown and designated on the aforesaid plat of Hager Heights and Citizens Development Company of Hagerstown, Washington County, recorded in Plat Record folio 220, as aforesaid, extending from Stratford Avenue South-eastwardly to Linganore Avenue as shown on said plat.

The aforesaid parcels Nos. 1 and 2 are all of the same property which was conveyed unto Elmer A. Corderman by Kary Ditner Janzer and William A. Danzer, her husband by deed dated the 6th. day of January, A.D. 1937, and duly recorded in Liber No. 202, folio 843, another of said Land Records of said Washington County, Maryland, and also being all of the same property which was conveyed unto the said Franklin M. Thomas by the said Elmer A. Corderman and his wife, by deed dated the 7th. day of January, A.D. 1937, and duly filed for record among the Land Records of said Washington County, Maryland, immediately preceding this deed, to all of which said deeds, and references therein contained reference is hereby made for a more full and complete description of said property.

Hagerstown

PARCEL NO. 3: All that lot or parcel of ground situated and lying in the Town of Hancock, in the County of Washington, State of Maryland, which was granted and conveyed to Central Chemical Company, Inc. by The Central Chemical Company by a deed dated February 13, 1930, and recorded among the Land Records of Washington County, in Liber 185, folio 50, and which is firstly described in a deed from Central Chemical Company, Inc. to The Davison Chemical Corporation, dated April 21, 1937, and recorded among said Land Records in Liber 203, folio 867, to which deed reference is hereby made, and which said lot or parcel of ground has a frontage of Sixty six feet on the berm side of the Chesapeake and Ohio Canal, and runs Northward therefrom to the South marginal line of the Western Maryland Railway Company, and adjoining Taney's Alley, and the property now or formerly owned by Robert Bridges; being the same lot or parcel of ground described in a deed from Thomas P. Gillicee and Mary A. Gillicee, his wife, to The Central Chemical Company, dated July 18, 1922, and recorded among said Land Records in Liber 185, folio 167.

PARCEL NO. 4 - All that lot or parcel of ground situated and lying North of the City of Hagerstown in the County of Washington, and more particularly described as follows: BEGINNING at a point in the East right of way line of the Cumberland Valley Railroad Company, thirty-five (35) feet distant from the center line of the main track of the said railroad, said point being also on the line between the property now, or formerly owned by the Citizens Development Company of Hagerstown, Washington County, and now, or formerly, owned by A. V. Barr and running thence with the land now or formerly, owned by A. V. Barr, North thirty-one (31) degrees eight (8) minutes East Twelve hundred and nine and eighteen hundredths (1209.18) feet, North fifty-seven (57) degrees twenty (20) minutes West seven hundred and ninety-four and fifty-one hundredths (794.51) feet, leaving the lands now, or formerly, owned by said A.V. Barr and bordering on lands now, or formerly, owned by The Citizens Development Company of Hagerstown, Washington County, South forty-eight (48) degrees thirty-five (35) minutes West six hundred and seventy-five hundredths (675.75) feet to the East right of way line of said Railway Company and with the same South twenty-nine (29) degrees, fourteen (14) minutes East eleven hundred and fifty-three and sixteen hundredths (1153.16) feet to the beginning.

BEING part of the same property which was conveyed to Central Chemical Company, Inc. by The Central Chemical Company by deed dated February 13th. 1930, and recorded among said land records in Liber 185, folio 50.

SAVING AND EXCEPTING, however, from said lot or parcels of ground described above as Parcels Nos. 3 and 4, the following two lots or parcels of grounds:

- (1) All that tract or parcel of ground which was conveyed to New York Central Iron Works Company, Incorporated, by Central Chemical Company, Incorporated, by deed dated May 23rd. 1932, and recorded among said Land Records in Liber 191, folio 239;
- (2) All that lot or parcel of ground which was conveyed to the Mayor and Council of Hagerstown, by Central Chemical Company, Incorporated, by deed dated May 23rd. 1932 and recorded among the said Land Records in Liber 191, folio 240.

BEING the same property which was secondly described in a deed from Central Chemical Company, Inc. to The Davison Chemical Corporation, dated April 21, 1937, and recorded among the Land Records of Washington County, in Liber 203, folio 867.

Deed 136/165
Plat 165-A+B

LAND RECORD
EO 204

ORIGINAL
(Red)

PARCEL NO. 5: All that tract or parcel of land situated in Hagerstown, Washington County, Maryland, and more particularly described as follows: BEGINNING at a point in the North fifty-five (55) degrees four (4) minutes West line between the properties of the Barr Farm Development Company and the New York Central Iron Works said point being the intersection of said line and the north marginal line of Mitchell Avenue and extending along said line, North fifty-five (55) degrees four (4) minutes West one hundred and thirty nine (139) feet to the end thereof, in the South thirty-one (31) degrees fifty two (52) minutes West line of the Central Chemical Company's property thence along said line, south thirty-one (31) degrees fifty-two (52) minutes West one hundred and eighty-four and one-tenth (184.1) feet to the North marginal line of Mitchell Avenue, thence with said north marginal line of Mitchell Avenue, North sixty eight (68) degrees fifty-six (56) minutes East one hundred eighty five and forty eight hundredths (185.48) feet to a curve, thence with said curve to right with a radius of one hundred eighty one and sixty five hundredths (181.65) feet a distance of thirty nine and forty seven hundredths (39.47) feet to the place of beginning, being all of that property lying between the north marginal line of Mitchell Avenue and the North fifty five (55) degrees four (4) minutes West line of the Barr Farm Development Company and the South thirty-one (31) degrees fifty-two (52) minutes West line of the Central Chemical Company being the Northwest corner of the property of New York Central Iron Works Company, and being a part of the same property which is described in a deed from Othello D. McCordell and others unto the New York Central Iron Works Company, Incorporated, dated August 3rd, 1914 and recorded among the Land Records of Washington County in Liber No. 145, folio 26.

BEING the same tract or parcel of land which is thirdly described in a deed from Central Chemical Company, Inc. to The Davison Chemical Corporation, dated April 21, 1937, and recorded among said Land Records in Liber 203, folio 887.

The aforesaid parcels Nos. 3, 4 and 5 being and are all the same property which was conveyed unto the said Franklin M. Thomas by The Davison Chemical Corporation, by deed dated the 3rd. day of May, A.D. 1937, and duly filed for record among the said Land Records of said Washington County, Maryland, immediately preceding this deed, to all of which said deeds and the references therein contained reference is hereby made for a more full and complete description of the property hereby granted and conveyed.

AND we, the said Franklin M. Thomas and Grace Howard Thomas, his wife, do hereby covenant that we will warrant specially the property hereby granted and conveyed, and that we will execute and deliver on demand such other and further assurances of said property as may be requisite.

WITNESS our hands and seals.

TEST: Catherine O. Pryor.

FRANKLIN M. THOMAS, (SEAL)
GRACE HOWARD THOMAS, (SEAL)

STATE OF MARYLAND, WASHINGTON COUNTY, To-wit:

I HEREBY CERTIFY, that on the 12th. day of May, A.D. 1937, before me, the subscriber, a Notary Public of the State of Maryland, in and for Washington County, personally appeared Franklin M. Thomas and Grace Howard Thomas, his wife, and did each acknowledge the foregoing deed to be their respective act and deed.

IN WITNESS WHEREOF, I have hereunto signed my name and affixed my official Notarial Seal the day and year last above written.

CATHERINE O. PRYOR, Notary Public.
My commission expires May, 1st, 1939

(N.P. SEAL)

At the request of JOHN D. ZENTMYER and HAZEL E. ZENTMYER, his wife, this DEED was recorded May 15th, 1937, at 9:40 o'clock A. M.

THIS DEED, made this 7th. day of April, 1937, by Warren F. Sterling, Bank Commissioner for the State of Maryland, Receiver for the Mechanics' Loan and Savings Bank.

WHEREAS, by a decree of the Circuit Court for Washington County, Maryland, sitting as a Court of Equity, dated the 29th. day of October, 1936, and passed in Equity Cause No. 11,791, in which proceedings the State of Maryland is Plaintiff and the Mechanics' Loan and Savings Bank is defendant, the said Warren F. Sterling, Bank Commissioner for the State of Maryland, was named as Receiver for the said Mechanics' Loan and Savings Bank; and

WHEREAS, the said Warren F. Sterling, Bank Commissioner for the State of Maryland, as such Receiver, has filed his bond as required by said decree, which said bond has been fully approved; and

WHEREAS, upon the petition of the said Receiver, the said Court passed an order in said proceedings on the 6th. day of April, 1937, authorizing and empowering him to sell the real estate hereinafter described at private sale to John D. Zentmyer and Hazel E. Zentmyer, his wife, at and for the sum of ONE HUNDRED DOLLARS, (\$100.00) and upon the payment of the full amount of said purchase price, and not before, to grant and convey unto the said purchasers all of the right, title and interest of the said Mechanics' Loan and Savings Bank in and to the said Real Estate; and

WHEREAS, the said Receiver has sold said Real Estate at private sale to the said John D. Zentmyer, and Hazel E. Zentmyer, his wife, in accordance with the power and authority vested in him, by the aforesaid order of Court; and

WHEREAS, the said purchasers have paid the purchase price in full to the said Receiver, the receipt whereof is hereby acknowledged,

NOW, THEREFORE, THIS DEED WITNESSETH: That the said Warren F. Sterling, Bank Commissioner for the State of Maryland, Receiver for the Mechanics' Loan and Savings Bank, as aforesaid, in consideration of the premises and of the payment of the purchase money to him by the said purchasers, and in execution of the power and authority in him vested by the aforesaid decree and order of the Circuit Court for Washington County, Maryland, does hereby grant and convey unto John D. Zentmyer and Hazel E. Zentmyer, his wife, all the right, title and interest of the Mechanics' Loan and Savings Bank in and to all those two lots of ground, situated in or near the City of Hagerstown, Washington County, Maryland, to-wit: Lot No. 150, having a frontage of 50 feet, more or less, and Lot No. 151, having a frontage of 60 feet, more or less, on the South side of Park Road, and extending back therefrom a distance of 160 feet to an alley, as designated on the Plat of "Keller's Addition to Hagerstown", which said Plat is recorded in Plat Record No. 1, folio 126, one of the Land Records of said

Received for Record
at _____ o'clock M.
Liber No. _____

over copy

F 175

THIS DEED, Made this 21st day of May, 1985, by
CENTRAL CHEMICAL CORPORATION, a Maryland Corporation.

WITNESSETH: That for and in consideration of the sum of
TWENTY-THREE THOUSAND (\$23,000.00) DOLLARS, and other good and
valuable considerations, receipt of which is hereby acknowledged,
the said Grantor herein does hereby grant and convey unto THE
CITY OF HAGERSTOWN, a municipal corporation existing under and by
virtue of the laws of the State of Maryland, all the unimproved
parcel of land described as follows:

An unimproved parcel of land situate on the Northwestern side
of Mitchell Avenue West of North Burhans Boulevard in Election
District No. 21, Hagerstown, Washington County, Maryland, and be-
ginning for a description of same at a point marked by a railroad
spike in the Northwestern marginal line of Mitchell Avenue, said
spike being the same one shown at the beginning of the North 55
degrees 22 minutes West 141.91 foot line of Parcel 'A' as shown on
the Plat of "Burhans Boulevard Subdivision for Garland E. Groh" on
file among the Plat Records of Washington County, Maryland, at
Plat No. 1640, thence running with said Northwestern marginal line
of Mitchell Avenue by a curve to the left having a radius of 181.65
feet for a distance of 37.74 feet and with a chord bearing and
distance of South 74 degrees 06 minutes 42 seconds West 37.67 feet;
thence continuing with Northwestern marginal line of Mitchell
Avenue South 68 degrees 12 minutes 36 seconds West 47.57 feet;
thence leaving Mitchell Avenue and running with the Northeastern
line of a 30-foot wide easement, which was granted to Henry A.
Bester, Jr., and J. Alvey Long, partners, trading as Bester-Long
Company, by Central Chemical Corporation of Maryland, by deed dated
August 22, 1944, and recorded at Liber 227, folio 305 among the
Land Records of Washington County, North 57 degrees 46 minutes West
319.73 feet to a point; thence, leaving said easement North 32
degrees 14 minutes East 150.00 feet to a point in the North 57
degrees 46 minutes West 806.89 foot line of Parcel 'B' as shown on
the aforementioned Plat No. 1640; thence, running with the lines of
Parcel 'B' and Parcel 'A' of said Plat, the following four (4)
courses and distances: first, South 57 degrees 46 minutes East
145.52 feet to an iron pipe; thence, leaving Parcel 'B' and running
with Parcel 'A' with corrected distances South 57 degrees 46 minutes
East 84.61 feet to an iron pipe; thence, South 31 degrees 34 minutes
West 77.54 feet to an iron pipe; thence, South 55 degrees 22 minutes
East 141.91 feet to the place of beginning, containing 0.978 acres
of land, more or less, being the Northernmost portion of Parcel
No. 5, and the Northeasternmost portion of Parcel No. 4 of those
five parcels of land which were conveyed to Central Chemical
Corporation of Maryland by Franklin M. Thomas and Grace Howard
Thomas, his wife, by deed dated May 12, 1937, and recorded at Liber
204, folio 100 among the Land Records of Washington County, Mary-
land, and title to which became vested in Central Chemical Corpora-
tion by virtue of Articles of Consolidation between Central Chemical
Corporation of Maryland and Central Chemical Corporation of
Pennsylvania. Said Articles of Consolidation were executed on or
about December 3, 1947 and filed with the State Tax Commission
of Maryland. Same were approved on December 23, 1947 as evidenced
by a Certificate of Consolidation which is recorded among the Land
Records of Washington County, Maryland at Liber 248, folio 242, to
which reference is hereby made. The name of the corporation formed
by the Articles of Consolidation is Central Chemical Corporation,
the Grantor herein.

CEN-023933

AR100599

EXHIBIT C

ORIGINAL

THE GRANTOR HEREIN FURTHER GRANTS AND CONVEYS UNTO THE GRANTEE the right, privilege and easement, in perpetuity, to construct, use, maintain, repair, improve and re-construct an access road for the purpose of ingress to and egress from the parcel of land hereby conveyed above, over and through the aforementioned 30-foot wide strip of land adjoining said parcel of land hereby conveyed in fee simple along the North 57 degrees 46 minutes West 319.73 foot line thereof and extending from Mitchell Avenue on the East to the end of said North 57 degrees 46 minutes West 319.73 foot line on the West, said easement over and through said 30-foot wide strip of land to be used in common by the Grantee herein and Thomas D. Kline and Richard F. Kline, Jr. who became the holders of an easement over and through said 30-foot wide strip of land by virtue of a Deed of Easement over and through said 30-foot wide strip of land and designated as Tract 2, Parcel 2, in a deed from Richard F. Kline Incorporated, dated December 31, 1980 and recorded at Liber 716, folio 713 among the Land Records of Washington County, Maryland (said Deed of Easement was originally granted to Henry A. Bester, et al. by Central Chemical Corporation of Maryland by Deed of Easement on August 22, 1944, recorded at Liber 227, folio 305 among the Land Records of Washington County, Maryland, to which reference is hereby made. The said Henry A. Bester, et al. being the predecessors in title to Thomas D. Kline and Richard F. Kline, Jr., shown on the attached City of Hagerstown Engineering Department Drawing No. 83-554-01).

The parcel of land hereby conveyed in fee simple, together with the 30-foot wide access easement adjacent thereto, are more particularly shown and designated on Drawings numbered 83-554-01, 83-554-02, 83-554-03, and 83-554-04 which are attached hereto, recorded herewith and made a part hereof and are on file in the Office of the City Engineer of the City of Hagerstown, Maryland.

PURSUANT to the provisions of Article 21, §14-113 of the Annotated Code of Maryland, David S. Schwartz, Senior Vice President, of Central Chemical Corporation, does hereby certify that this conveyance is not a part of a transaction in which there is a sale, lease, exchange or other transfer of all or substantially all of the property and assets of the said corporation, the Grantor herein.

And the Grantor hereby covenants that it will warrant generally the property hereby conveyed, except as to any easements, conditions and restrictions of record, and that it will execute such other and further assurances that may be requisite and necessary.

WITNESS the corporate name of Central Chemical Corporation by David S. Schwartz, its Senior Vice President, and its duly authorized agent and representative, the day and year first above written.

WITNESS AND ATTEST AS
TO CORPORATE SEAL:

CENTRAL CHEMICAL CORPORATION

By T. W. Johnson
Asst Secretary

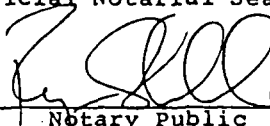
By David S. Schwartz
David S. Schwartz
Senior Vice President

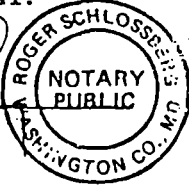
STATE OF MARYLAND
WASHINGTON COUNTY, To-wit:

I HEREBY CERTIFY that on the 21st day of May, 1985, before me, a Notary Public of the State of Maryland, personally appeared DAVID S. SCHWARTZ, who acknowledged himself to be the Senior Vice President of Central Chemical Corporation and that he, as such officer, being authorized so to do, executed the foregoing instrument for the purposes therein contained by signing the name of the Corporation by himself as such officer and certified that

this conveyance is not part of a transaction in which there is a sale, lease, exchange or other transfer of all or substantially all of the property and assets of the Corporation.

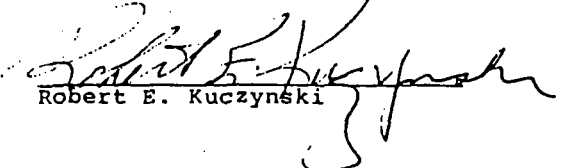
WITNESS my hand and Official Notarial Seal.


Notary Public



My Commission Expires:
July 1, 1986

THIS IS TO CERTIFY that the within instrument was prepared by or under the supervision of the undersigned, an attorney duly admitted to practice before the Court of Appeals of Maryland.


Robert E. Kuczynski

ORIGINAL
(Red)

Deed of Easement
to Thomas D. Kline
et al. L. 716 / F. 713

Easement to be
used jointly by the
City of Hagerstown
& Thomas D. Kline et al.

Remaining Land of
Central Chemical
Corp. of Md.
L. 204 / F. 100
Parcel 4

Parcel to be
conveyed:
0.978 Ac. ±

Land of
Garland E. Groh
L. 198 / F. 566
Par. 'B' - Plat 1640

Land of
Frank A. Cressler et al.
L. 759 / F. 850
Par. 'A' - Plat 1640

Parcel 'A' & 'B' as
shown on the Plat
of "Burhans Blvd.
Subdivision for
Garland E. Groh"
Wash. Co. Plat #1640

R. 181.65'
A. 11°-54'-12"
L. 37.74'
T. 18.94'
Chd. S 74°-06'-42" W
37.67'

ax Map No. 34
lection District 21
oning IR

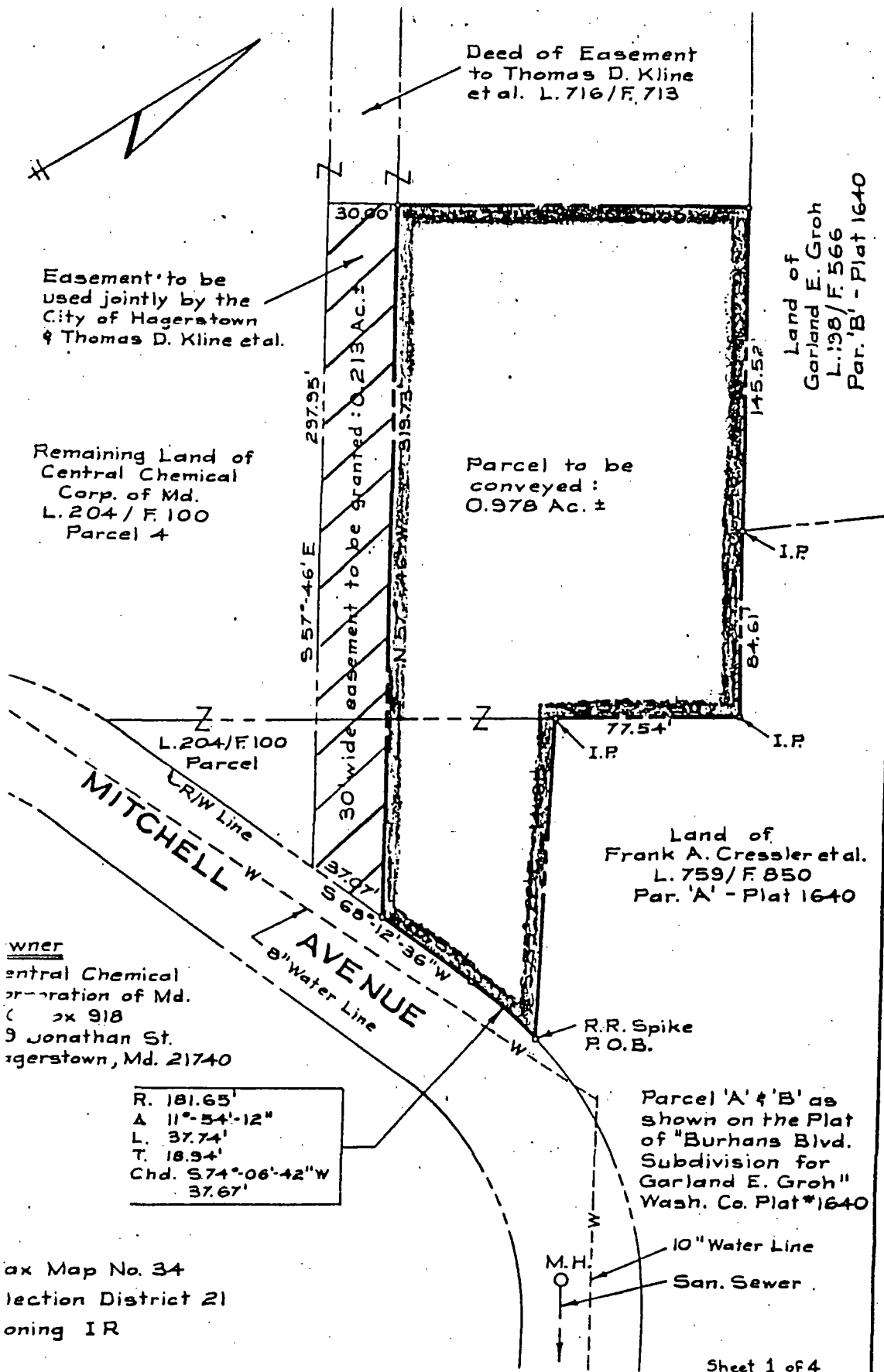
Sheet 1 of 4

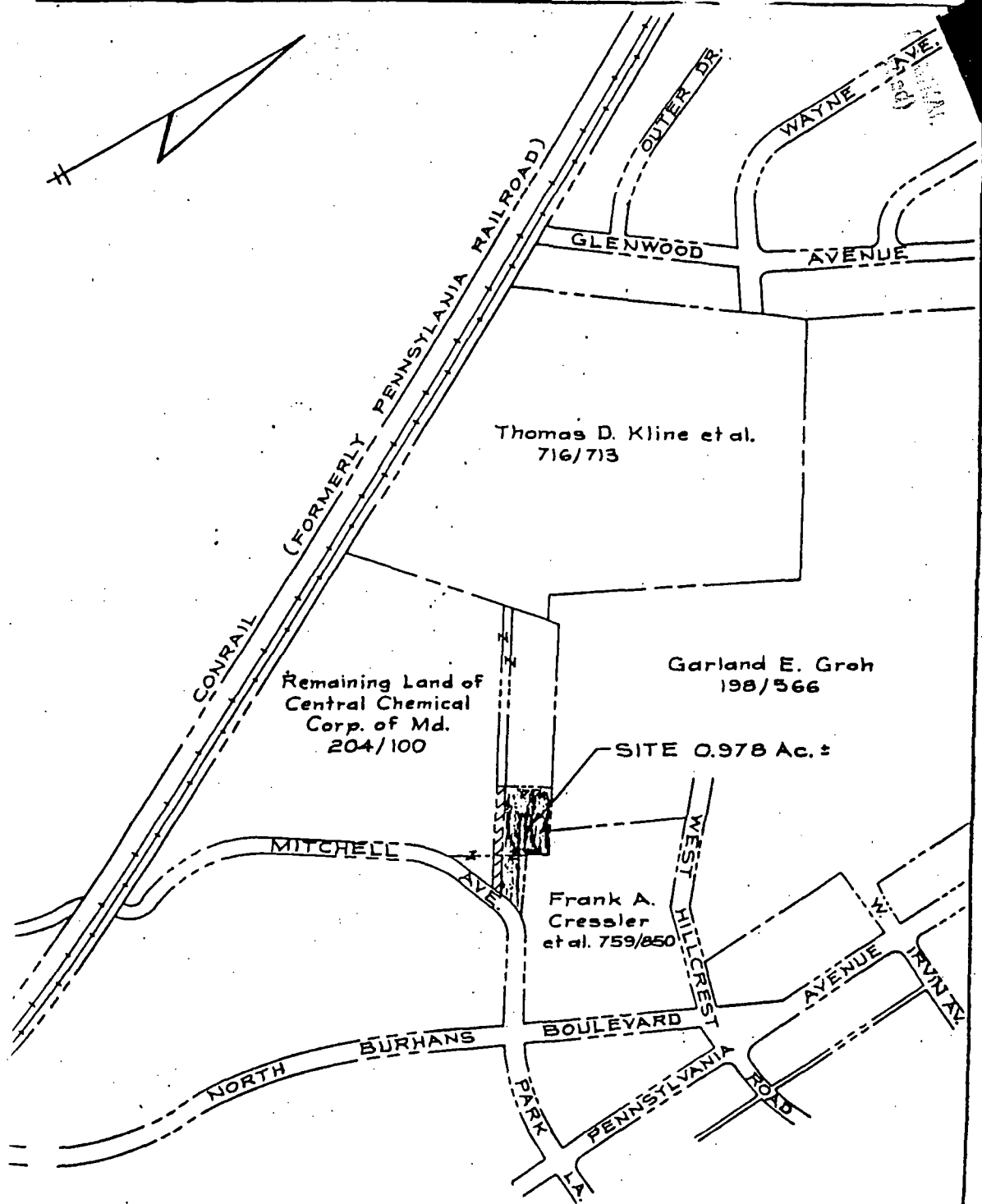
CITY OF HAGERSTOWN, MD. — ENGINEERING DEPARTMENT

Subdivision of Lands of
Central Chemical Corporation
of Maryland - to be conveyed
to the City of Hagerstown

	DATE	
DRAWN T.R.H.	3-19-85	DWG. NO. 83-554-01
CHECKED		SCALE 1" = 50'
APPROVED		

CEN-023936
AR100602





Sheet 2 of 4

CITY OF HAGERSTOWN, MD. — ENGINEERING DEPARTMENT

Subdivision of Lands of
Central Chemical Corporation
of Maryland - to be Conveyed
to the City of Hagerstown

DATE	3-19-65	DWG. NO. 83-554-02
DRAWN T.R.H.		
CHECKED		
APPROVED		SCALE 1" = 400'

AR100603
CEN-023937

DECLARATION OF INTENT OF SUBDIVISION

I HEREBY CERTIFY THAT THE INTENT OF THE SIMPLIFIED PLAT FOR SUBDIVISION SHOWN HEREON IS FOR CONVEYANCE ONLY AND NOT FOR THE DEVELOPMENT OF SAME. ANY PLANS FOR DEVELOPMENT OF THIS LAND WILL BE SUBMITTED TO THE PLANNING COMMISSION IN ACCORDANCE WITH THE RULES AND REGULATIONS OF THE CITY OF HAGERSTOWN.

DATE April 9, 1985 David S. Schwartz
 DAVID S. SCHWARTZ
 SENIOR VICE PRESIDENT
 CENTRAL CHEMICAL CORPORATION OF MARYLAND

CERTIFICATE OF APPROVAL

I DO HEREBY CERTIFY THAT THE PLAN FOR SUBDIVISION SHOWN HEREON COMPLIES WITH THE SUBDIVISION ORDINANCE FOR THE CITY OF HAGERSTOWN, MARYLAND, WITH THE EXCEPTION OF SUCH VARIANCES, IF ANY, AS NOTED ON THIS PLAN AND IN THE MINUTES OF THE HAGERSTOWN PLANNING COMMISSION, AND IS APPROVED FOR RECORDING IN THE OFFICE OF THE REGISTER OF DEEDS.

HAGERSTOWN PLANNING COMMISSION

DATE Apr 11, 1985 BY Rebecca A. Cichart

CERTIFICATE OF ACCURACY

I HEREBY CERTIFY THAT THE PLAN SHOWN AND DESCRIBED HEREON IS A TRUE AND CORRECT SURVEY TO THE ACCURACY REQUIRED BY THE HAGERSTOWN PLANNING COMMISSION AND THAT THE MONUMENTS HAVE BEEN PLACED AS SHOWN HEREON TO THE SPECIFICATIONS OF THE HAGERSTOWN SUBDIVISION ORDINANCE.

DATE April 11, 1985 Merie L. Saville
 MERIE L. SAVILLE
 CITY ENGINEER
 MD. REG. NO. 9793

NOTES

1. BEARINGS BASED ON "BURHANS BOULEVARD SUBDIVISION FOR CARL W. TROTT", WASHINGTON COUNTY RECORD PLAT NO. 650, AND MARKERS THEREOF FOUND IN THE FIELD.
2. ZONING - IC.
3. PARCEL BEING CONVEYED TO BE SERVED BY PUBLIC WATER AND SEWER.

CERTIFICATE OF OWNERSHIP AND DEDICATION

I, DAVID S. SCHWARTZ, SENIOR VICE PRESIDENT, CENTRAL CHEMICAL CORPORATION OF MARYLAND, DO HEREBY CERTIFY THAT WE ARE THE LEGAL AND TRUE OWNERS OF THE PROPERTY SHOWN AND DESCRIBED HEREON AND THAT WE ADOPT THE PLAN OF SUBDIVISION AND ESTABLISH THE MINIMUM BUILDING RESTRICTION LINES.

WE DO HEREBY DEDICATE ALL UTILITY EASEMENTS AND DRAINAGE AREAS UNTO THE CITY OF HAGERSTOWN, MARYLAND, AND RESERVE THE FEE SIMPLE TITLE TO ALL RIGHTS-OF-WAY, STREETS, ALLEYS, OPEN SPACES, AND OTHER PUBLIC SITES.

SHEET 1 OF 4

CITY OF HAGERSTOWN, MD.		ENGINEERING DEPARTMENT	
Subdivision of Lands of Central Chemical Corporation of Maryland - to be Conveyed to the City of Hagerstown	DRAWN	A.W.	DATE 4-11-85
	CHECKED		DWG. NO. 83-554-03
	APPROVED		SCALE None

ORIGINAL

WE DO HEREBY OFFER TO DEDICATE SAID AREAS AND ALL PUBLIC UTILITY SYSTEMS THEREIN TO THE CITY OF HAGERSTOWN, MARYLAND, FOR THE USE OF THE PUBLIC IN GENERAL. SAID OFFER SHALL BE DEEMED TO BE ACCEPTED BY THE CITY UNTIL SAID OFFER IS FORMALLY ACCEPTED IN THE MANNER PRESCRIBED BY LAW.

THIS DEED AND AGREEMENT OF DEDICATION SHALL BE BINDING UPON OUR GRANTEES, ASSIGNS, SUCCESSORS, HEIRS, AND PERSONAL REPRESENTATIVES AND ALL PARTIES AND INTEREST THE HEREUNTO AFFIXED THEIR SIGNATURES INDICATING THEIR ASSENT TO THIS PLAN OF SUBDIVISION.

WITNESS MY HAND AND SEAL THIS 8 DAY OF April, 1985.

WITNESS:

Lawrence M. Keagy

David S. Schwartz
DAVID S. SCHWARTZ
SENIOR VICE PRESIDENT
CENTRAL CHEMICAL CORPORATION OF MARYLAND

SHEET 4 OF 4

CITY OF HAGERSTOWN, MD.		ENGINEERING DEPARTMENT	
Subdivision of Lands of Central Chemical Corporation of Maryland - to be Conveyed to the City of Hagerstown		DATE	DWG. NO. 83-554-04
		DRAWN A.W.	
		CHECKED	
		APPROVED	