



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

MAY 29 2001

To: Addressees

Re: Malvern TCE Superfund Site
Opportunity to Participate in *De Minimis* Settlement

Dear Sir or Madam:

This letter notifies you that the United States Environmental Protection Agency ("EPA") is now offering certain parties the opportunity to enter into a proposed second round *de minimis* settlement pursuant to Section 122(g) of CERCLA, 42 U.S.C. § 9622(g) and that you may qualify for this *de minimis* settlement in connection with the Site. A list of parties eligible to participate in this settlement is enclosed as Attachment "A."

EPA previously sent you (or your corporate predecessor) a Notice Letter with respect to the Site. This correspondence identified you as a potentially responsible party ("PRP") for the Site.

As explained in that previous letter, EPA has conducted and overseen activities at the Site in response to the release and/or threat of release of hazardous substances, pollutants and/or contaminants into the environment. In May 1999, EPA and 169 *de minimis* parties entered into an Administrative Order on Consent, which became effective September 28, 1999. EPA has recently learned that you intended to join that first round *de minimis* settlement for this Site; however, EPA's records do not reflect that this occurred. In light of this situation, EPA is providing a new document for you to sign, with most of the same terms as the prior document. However, the payment amount has been revised and updated to reflect increased costs at the Site, and the premium formulation and the reservation of rights by the United States has been revised to take into account EPA's current information regarding Site conditions. For our records, we are designating this as a second round *de minimis* settlement.

1. ***Site Background***

CERCLA, more commonly known as Superfund, has several key objectives including setting priorities for cleanup of the worst hazardous sites in the country, and, determining the parties potentially responsible for investigating, cleaning up or paying the costs of cleaning up such hazardous sites. These parties are referred to as "potentially responsible parties" or "PRPs."

On October 14, 1992, EPA included the Site on the National Priorities List ("NPL"), a list of the most serious uncontrolled or abandoned sites at which releases of hazardous substances have occurred or may occur. For a more detailed discussion of the Site background, please see Enclosure 1.

2. ***"De Minimis" Settlements***

This letter also serves as notice to the parties listed on Attachment "A," of the opportunity to participate in a second round *de minimis* settlement with EPA in connection with the Site. Based on EPA's review of the records pertaining to the Site, you appear to be responsible for a relatively small amount of hazardous substances at the Site. Therefore, you are being offered this opportunity to settle as a *de minimis* party.

Pursuant to CERCLA, 42 U.S.C. § 9601, *et seq.*, EPA has conducted and overseen a number of activities at the Site in response to the release and/or threat of release of hazardous substances, pollutants, and/or contaminants into the environment, described above and in Enclosure 1. CERCLA not only authorizes EPA to take actions at sites such as the Malvern TCE Superfund Site to protect public health, welfare, and the environment, it also permits EPA to request and require that parties who are responsible for the waste pay to clean up the Site.

Under Section 122(g) of CERCLA, EPA may offer special settlements to *de minimis* PRPs. Any party who settles its liability to the United States pursuant to this *de minimis* settlement will not be required to perform Site cleanup work. Instead, the *de minimis* settlor will pay an amount calculated by EPA to represent that party's proportionate share of costs already incurred and to be incurred at the Site, plus a premium accounting for, among other things, uncertainties in the costs of work not yet performed. In exchange for this cash payment, EPA will agree not to sue or take other civil action against the *de minimis* settlor with regard to this Site and will provide the *de minimis* settlor with contribution protection (see discussion on page 4), subject to the settlor's compliance with the terms of the settlement.

The enclosed Administrative Order by Consent ("Consent Order") (Attachment "B") sets forth the terms for concluding your liability to the United States for response costs incurred or to be incurred under CERCLA. EPA has released this Consent Order for your signature. This opportunity to settle under the terms described herein is being offered for a limited time. EPA will accept your signature on the Consent Order for **thirty (30) days** from receipt of this offer.

In order to assist you in your review of the specific terms of the Malvern TCE Superfund Site *de minimis* settlement offer, the following information is provided:

A. De Minimis Settlement Eligibility

1. Small Waste Contributors

PRPs may be eligible for *de minimis* settlements if such parties contributed a minimal amount of hazardous substances, in comparison to other hazardous substances at the Site. In addition, the toxicity or other hazardous effects of the hazardous substances contributed by a PRP to the Site must not be significantly greater than that of other hazardous substances at the Site.

2. Volumetric Ranking Summary

Small waste contributors eligible for *de minimis* settlement have been identified by EPA by utilizing volumetric ranking summaries prepared for the Site. EPA initially prepared two volumetric ranking summaries, a "Generator VRS" and a "Broker/Transporter VRS," dated November 30, 1998 (collectively referred to as "Summaries"). These Summaries are provided in Attachment "C." As will be described in greater detail below, a PRP is eligible to participate in this settlement if its volumetric contribution of hazardous substance to the Site is at or less than .75% of the total volume attributed to the Main Plant Area ("MPA") of the Site. EPA also has established a *de micromis* cutoff at 1.5 drums or less.

The attached Summaries were compiled using comprehensive Site documents, including invoices, bills of lading, shipping orders and manifests, obtained by EPA from Chemclene. The Summaries reflect revisions made by EPA to previous draft summaries as a result of EPA's review of ranking challenges received from PRPs. These Summaries also reflect EPA's research into whether certain PRP companies are still in existence. See Attachment "C," "Malvern TCE Volumetric Ranking Summaries Overview and Methodology" ("VRS Overview and Methodology") and "VRS Explanation Sheet," for additional information as to the methodology utilized and information contained in the Summaries.

There will be no further waste reallocation conducted for the purposes of this *de minimis* settlement.

The Summaries and the new Volumetric Ranking Summary for the Second Round *De Minimis* Settlement ("New VRS") provide, for each PRP, waste-in volume and percentage information for both the MPA and the Former Disposal Area ("FDA") at the Site. Since all PRP waste into the Site was received and processed by Chemclene in the MPA, EPA has set the *de minimis* settlement eligibility cut-off at or less than .75% of the total MPA waste volume. Generator PRPs should refer to the "MPA %" column contained in the Generator VRS in order to determine their MPA %. Broker/transporter PRPs should add their MPA % listed on both the Generator VRS and the Broker/Transporter VRS, in order to determine their total MPA %. See Attachment "C," "VRS Overview and Methodology," for additional information as to the information contained in the Generator VRS and Broker/Transporter VRS.

Since the preparation of the Summaries, EPA has incurred additional costs for activities at the Site. Consequently, EPA has prepared a New VRS that includes total volumetric information for both Generators and Broker/Transporters. The New VRS incorporates the new higher costs into its cost allocation for each eligible PRP. The New VRS reflects the total payment amounts for the *de minimis* parties eligible for this settlement and is provided as Attachment "D."

B. De Minimis Settlement Terms

1. De Minimis Settlement Payment

In order to participate in this settlement, each *de minimis* PRP must agree to pay the amount listed next to its company in the "Total Payment" column on the New VRS (Attachment "D").

The total payment amount represents each *de minimis* PRP's FDA and MPA percentage contribution towards past costs incurred by EPA at the Site and estimated future costs to clean up the Site, plus a premium payment. The premium payment of formulation of 50%, subject to a reopener, for this settlement offer has been determined based upon a variety of factors specific to both the Site and the settlement. In addition, for parties who were offered an opportunity to join in the original *de minimis* settlement, an additional 10% will be included in the premium.

In order to determine a *de minimis* PRP's total *de minimis* settlement payment, EPA has divided costs associated with the FDA and the MPA and calculated total payment amounts for each of these areas.

2. Covenant Not to Sue

EPA will provide each settling *de minimis* PRP with a covenant not to sue. This provision is a promise that EPA will not bring any future legal actions against you regarding the Site and the specific matters identified by the settlement, provided that EPA's information regarding the volume and toxicity of your wastes is correct.

3. Contribution Protection

EPA will provide each settling *de minimis* PRP with contribution protection. This provision offers you protection from being sued by other PRPs at the Site. Frequently, major waste contributors will sue small waste contributors to recover clean up costs. A *de minimis* settlement provides protection from such suits that extends to all issues covered by the settlement.

C. Information to Assist PRPs

1. Information about the Site

In addition to the information contained in this letter, key documents about the Site are available for your review at the following locations:

U.S. EPA- Region III
Public Reading Room
Ms. Anna Butch
1650 Arch Street
Philadelphia, PA 19107
(215) 814-3157

Chester County Library
400 Exton Square Parkway
Exton, PA 19341
(610) 363-0884

2. *Other De Minimis Parties*

In connection with the first round *de minimis* settlement some *de minimis* PRPs formed *de minimis* PRP groups as a result of previous activities at the Site. Those group representatives are as follows:

Philip L. Hinerman, Esq.
Fox, Rothchild, O'Brien & Frankel, LLP
2000 Market Street, 10th Floor
Philadelphia, PA 19103-3291
(215) 299-2000

Andrew P. Foster, Esq.
Drinker Biddle & Reath LLP
1345 Chestnut Street
Philadelphia, PA 19109-3496
(215) 928-2512

3. Other Site PRPs

EPA has identified PRPs at the Site that EPA has determined are not eligible for *de minimis* settlement and to whom this *de minimis* settlement offer has not been extended. These PRPs are those with an MPA % of greater than .75%. An address list, reflecting the names and addresses of all Site PRPs, including both *de minimis* and those not eligible for *de minimis*

settlement, is attached (Attachment "E"). Additional *de minimis* settlement offers may be made to other eligible PRPs in the future.

D. Form of the Settlement

This settlement offer is extended only to the addressees of this letter. You have **thirty (30)** days from the receipt of this offer to sign and return the enclosed Consent Order. Executed signature pages may be sent to the following:

Michael Frankel, Senior Paralegal (3RC41)
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103

Once the parties have signed the Consent Order, there will be a public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. § 9622(i)(3), EPA may withdraw its consent to the Consent Order if comments received disclose facts or considerations that indicate that the Consent Order is inappropriate, improper, or inadequate. If the comments received do not require modification of, or EPA withdrawal from, the Consent Order, the effective date of the Consent Order shall be the date upon which EPA issues written notice to the Respondents.

If you already are involved in discussions with State or local authorities, engaged in voluntary action, or involved in a lawsuit regarding this Site, you should not interpret this letter as advising or directing you to restrict or to discontinue any such activities. You should, however, report the status of those discussions or activities in your letter to EPA. The factual and legal discussions contained in this letter are intended solely for notification and information purposes. They are not intended to be, and cannot be relied upon, as a final EPA position on any matter set forth herein.

EPA has determined that some of the companies receiving this letter may be small businesses under the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"). Please see Attachment G to this letter. This information has been provided for informational purposes only pursuant to EPA policy, and is not intended to influence any PRP's decision to enter into settlement negotiations pursuant to this letter.

If you have any questions relating to the foregoing, you may call Carlyn Winter Prisk, Civil Investigator, at (215) 814-2625.

Sincerely,



Heather Gray Torres, Esquire
Associate Regional Counsel

Enclosures:

- Enclosure 1 - Site Background
- Attachment A - List of *De Minimis* Parties receiving this settlement offer
- Attachment B - Draft Administrative Order on Consent for *De Minimis* Parties
- Attachment C - Generator Volumetric Ranking Summary (with attached Volumetric Ranking Summary Explanation Sheet)
Broker/Transporter Volumetric Ranking Summary (with attached Volumetric Ranking Summary Explanation Sheet)
Volumetric Ranking Summaries Overview and Methodology
- Attachment D - New Volumetric Ranking Summary for the Second Round De Minimis Settlement ("New VRS") (with attached Volumetric Ranking Summary Explanation Sheet)
- Attachment E - Comprehensive Mailing List (All Site PRPs)
- Attachment F - Site Documents
Comprehensive Transaction Reports
- Attachment G - Small Business Regulatory and Enforcement Fairness Act Information Sheet

Enclosure 1

Enclosure 1

The Malvern TCE Superfund Site ("Site") is located at and near 258 N. Phoenixville Pike, Malvern, East Whiteland Township, Pennsylvania.

From 1952 until 1992, Chemclene Corporation sold and reclaimed industrial cleaning solvents, including trichloroethene ("TCE"); 1,1,1-trichloroethane ("1,1,1-TCA"); perchloroethylene ("PCE," also called tetrachloroethene); and methylene chloride ("MEC"). These solvents were used by local industries for degreasing metal parts and other cleaning purposes. Chemclene used a distillation process to remove impurities from the chlorinated solvents. The distilled solvents were then resold to customers for reuse, or resold to other customers. Chemclene utilized two areas of the Site as part of its operations, the Main Plant Area ("MPA") and the Former Disposal Area ("FDA").

The end products of processing waste solvents are the reclaimed solvents and chlorinated still bottoms. The chlorinated waste solvents are listed hazardous wastes pursuant to the Resource Conservation and Recovery Act ("RCRA") and, therefore, the resulting still bottoms are listed hazardous waste. Prior to 1975, Chemclene reportedly buried drums containing the still bottom sludges from the distillation process in the Former Disposal Area/Mounded Area ("FDA"), approximately 1,900 feet southwest of the main plant. The FDA consists of two unlined earthen pits, each approximately 30 feet by 50 feet by 15 feet deep. This area is currently secured by an 8-foot high chain link fence. The Mounded Area, located on the western edge of the FDA, is approximately 8 feet wide by 150 feet long.

Chemclene's activities at the Site have been linked to the presence of volatile organic contaminants in the ground water and soil at the MPA and the FDA and the groundwater of the adjacent Spring Ridge Property. These contaminants include TCE, PCE, 1,1,1-TCA, MEC, 1,1-DCE, among others, and are listed as hazardous substances under 40 C.F.R. § 302.4.

In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Chemclene facility. At this time, Chemclene Corporation began sampling domestic wells in the immediate vicinity of the property. Private domestic wells and on-Site monitoring wells were sampled by Pennsylvania's Department of Environmental Resources ("PADER"), now known as the Department of Environmental Protection ("PADEP"), and Chemclene in June 1980 and July 1981. Analytical results revealed contamination of the underlying aquifer with chlorinated ethenes and related compounds. TCE was detected in wells at concentrations up to 12,600 micrograms per liter (" $\mu\text{g/l}$ "), far exceeding the Maximum Contaminant Level ("MCL") of 5.0 $\mu\text{g/l}$. The Site was listed on the Superfund National Priorities List ("NPL") in September 1983. The contaminated home wells were located south of the FDA, with several located in the Hillbrook Circle residential development. Chemclene furnished activated carbon filter units to twenty (20) residential wells within the Hillbrook Circle Development and conducted periodic sampling of home wells in accordance with its Domestic Well Management Plan until November 1994. In February 1995, EPA assumed control of maintenance activities of the carbon filter units and periodic sampling of the home wells, after it was determined that Chemclene was not following the procedures outlined in its Domestic Well Management Plan. In August 1995,

several of the filter systems were upgraded by EPA in response to analytical results from residential well samples that showed contamination was passing through the existing filters into the homes.

In addition to the installation of carbon filters, Chemclene conducted removal actions following the detection of soil and groundwater contamination in 1980. Debris and approximately 300 drums were removed from the FDA excavations, in a prolonged removal effort from 1981 to 1984. Soils underlying the FDA were excavated to a depth of 15 feet and transported for disposal at a RCRA permitted disposal facility. Additional drums were removed from the Mounded Area in late 1990; however, contaminated soil was left in place.

Four underground storage tanks ("UST"s) were removed from the MPA in 1986. Soil samples collected from below the excavation grade of the tanks exhibited elevated concentrations of TCE, PCE, and 1,1,1-TCA. In addition, elevated levels of volatile organic compounds ("VOCs") were detected in soil gas samples collected outside the distillation building in the MPA. These contaminant levels are believed to be related to Chemclene's past practices of discharging contaminated condensate from the recycling distillation process directly onto the ground surface.

As an operating facility, Chemclene entered into a RCRA Corrective Action Order with EPA in 1987. A RCRA Facilities Investigation ("RFI") Work Plan was approved for the Site in 1989. In July 1992, Chemclene withdrew its RCRA Part B Application as a treatment and storage facility, and to EPA's knowledge stopped accepting waste solvents for reclamation.

Chemclene failed to complete the RFI and implement interim corrective measures. As a result, EPA began considering the Site under the Superfund remedial program in November 1993. All existing data was compiled and a report was developed entitled Data Summary Report, April 1995. Based on EPA's review of the existing information, data gaps were identified and EPA was unable to conduct a Human Health or Ecological Risk Assessment. Accordingly, EPA conducted a Remedial Investigation ("RI") to complete the necessary data gathering at the Site. The RI was completed in January 1997 and the Feasibility Study ("FS") in June 1997. The Proposed Plan for a comprehensive Site clean up was issued in June 1997. In November 1997, EPA issued a Record of Decision ("ROD") selecting a final remedy for cleanup of the Site. Available information indicates that Chemclene ceased operations in the Fall of 1999.

In April 1998, EPA notified approximately 250 generator and transporter potentially responsible parties ("PRPs") of their eligibility for a potential Superfund *de minimis* settlement offer regarding the Site. Additionally, in May 1998, EPA issued Special Notice Letters to approximately 40 non-*de minimis* potentially responsible parties which notified them of their opportunity to resolve their liability with respect to the Site.

In May 1999, EPA and 169 *de minimis* parties entered into an Administrative Order on Consent, which became effective September 28, 1999. In December 1999, the U.S. District Court for the Eastern District of Pennsylvania entered a Consent Decree between EPA and 35

non-*de minimis* parties. Among other things, the 35 non-*de minimis* parties agreed to implement the Remedial Design and Remedial Activity specified in the November 1997 ROD.

Attachment A

Attachment A

De Minimis Parties Eligible for Settlement

American Electronics Laboratory

c/o BAE Systems
Patrick S. Till, Environmental/Safety Engineer
305 Richardson Road
Lansdale, PA 19446

Boekel Industries

c/o Boekel Scientific Industries
Mark Davies
855 Pennsylvania Ave
Feasterville, PA 19053

Ervin's Crafts

c/o Irvin's Craft Shop
Irvin Hoover
RR#1, Box 73
Mount Pleasant Mills, PA 17853

c/o Robert Hoffman, Esq.
Reed, Smith
P.O. Box 11844
Harrisburg, PA 17108

Elco Corporation

Dennis Oldland, Corporate Environmental Safety and Security
801 17th Avenue South
P.O. Box 861
Myrtle Beach, SC 29577

c/o Phillip L. Hinerman, Esq.
Fox, Rothchild, O'Brien & Frankel, LLP
2000 Market Street, 10th Floor
Philadelphia, PA 19103-3291

K-D Tool Manufacturing

c/o Danaher Tool Group
Robert Daveny, President
805 Estelle Drive
Lancaster, PA 17601

c/o Phillip L. Hinerman, Esq.
Fox, Rothchild, O'Brien & Frankel, LLP
2000 Market Street, 10th Floor
Philadelphia, PA 19103-3291

Maida Development Company

20 Libbey Street
Hampton, VA 23663

c/o Chip Gauch, Esq.
Hunton & Williams
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219-4074

McHugh Railroad Maintenance Equipment Company

James McHugh, CEO
Box 6
Fairless Hills, PA 19030

c/o Gerald Hughes, Esq.
850 Bare Tavern Road
West Trenton, NJ 08628

Photofabrication Chemical and Equipment Company

522 Lancaster Avenue
Malvern, PA 19355

c/o Phillip L. Hinerman, Esq.
Fox, Rothchild, O'Brien & Frankel, LLP
2000 Market Street, 10th Floor
Philadelphia, PA 19103-3291

R & E Martin, Inc.

Richard Martin II, CEO
P.O. Box 4701
Philadelphia, PA 19134

c/o Phillip L. Hinerman, Esq.
Fox, Rothchild, O'Brien & Frankel, LLP
200 Market Street
Philadelphia, PA 19103-3291

Technitrol, Inc.

Larry Gaudino, Director of Environmental Services
1003 Corporate Lane
Export, PA 15632

Attachment B

IN THE MATTER OF:)
)
Malvern TCE Superfund Site)
258 N. Phoenixville Pike)
Malvern, Pennsylvania)
)
Proceeding under Section 122(g)(4))
of the Comprehensive Environmental)
Response, Compensation, and)
Liability Act of 1980, as amended,)
42 U.S.C. § 9622(g)(4))
)

U.S. EPA Docket No.

**ADMINISTRATIVE ORDER
ON CONSENT FOR DE MINIMIS
SETTLEMENT**

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IN THE MATTER OF:)	
)	
Malvern TCE Superfund Site)	U.S. EPA Docket No.
258 N. Phoenixville Pike)	
Malvern, Pennsylvania)	
)	
Proceeding under Section 122(g)(4))	
of the Comprehensive Environmental)	ADMINISTRATIVE ORDER
Response, Compensation, and)	ON CONSENT FOR DE MINIMIS
Liability Act of 1980, as amended,)	SETTLEMENT
42 U.S.C. § 9622(g)(4))	
)	

I. JURISDICTION

- A. This Administrative Order on Consent (“Consent Order” or “Order”) is issued pursuant to the authority vested in the President of the United States by Section 122(g)(4) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended (“CERCLA”). 42 U.S.C. § 9622(g)(4), to reach settlements in actions under Section 106 or 107 of CERCLA, 42 U.S.C. § 9606 or 9607. The authority vested in the President has been delegated to the Administrator of the United States Environmental Protection Agency (“EPA”) by Executive Order 12580, 52 Fed. Reg. 2923 (Jan. 29, 1987), and further delegated to the Regional Administrators of the EPA by EPA Delegation No. 14-14-E (September 13, 1987).
- B. This Consent Order represents the second Administrative Order On Consent for De Minimis Settlement entered into by and between EPA and de minimis potentially responsible parties (“PRPs”) for the Malvern TCE Superfund Site. The first Administrative Order on Consent for De Minimis Settlement (“De Minimis AOC I”), Docket No. III-98-074-DC, by and between EPA and certain De Minimis PRPs (“De Minimis Respondents I”) became effective on or about September 28, 1999.
- C. This Consent Order is entered into voluntarily by and between EPA and each of the de minimis potentially responsible parties listed in Appendix “A” who have executed the attached signature pages (“De Minimis Respondents II” or “Respondents II”). Each De Minimis Respondent II agrees to undertake all actions required by the terms and conditions of this Order. Each De Minimis Respondent II consents to and will not contest EPA's jurisdiction to issue this Order or to implement or enforce its terms.

- D. The De Minimis Respondents II agree and submit that the United States District Court for the Eastern District of Pennsylvania has jurisdiction over this Consent Order for the purposes of any subsequent proceedings for implementation or enforcement of this Order because a release or threatened release of hazardous substances has occurred at the Malvern TCE Superfund Site ("Site") in Malvern, Chester County, Pennsylvania, as hereinafter defined, which is located in such judicial district.
- E. This Consent Order was agreed to and executed by EPA and the De Minimis Respondents II in good faith to avoid the expense and delay of litigation over the matters addressed by this Consent Order.
- F. EPA and the De Minimis Respondents II agree that this Consent Order is entered into without any admission of liability for any purpose as to any matter arising out of the transactions or occurrences alleged in the Order. The participation of the De Minimis Respondents II in this Order shall not be considered an admission of liability and shall not be admissible in evidence against the De Minimis Respondents II in any judicial or administrative proceeding other than proceedings to implement or enforce this Order or a judgement relating to it.

II. STATEMENT OF PURPOSE

1. By entering into this Consent Order, the mutual objectives of the Parties are:
- a. to reach a final settlement among the Parties with respect to the Site pursuant to Section 122(g) of CERCLA, 42 U.S.C. § 9622(g), that allows the De Minimis Respondents II to make a cash payment, including a premium, to resolve their alleged civil liability under Sections 106 and 107 of CERCLA, 42 U.S.C. §§ 9606 and 9607, for injunctive relief with regard to the Site and for response costs incurred and to be incurred at or in connection with the Site, thereby reducing litigation relating to the Site, subject to a reopener specified in Paragraph 28 below;
 - b. to simplify the remaining enforcement activities concerning the Site by reducing to the extent possible the number of parties involved in the Site;
 - c. to reimburse the Hazardous Substances Superfund for a portion of the response costs incurred or to be incurred in connection with the Site without waiving the United States' assertion of joint and several liability against parties other than the De Minimis Respondents II.

III. PARTIES BOUND

2. This Consent Order shall apply to and be binding upon EPA, and upon the De Minimis Respondents II, and their successors and assigns. Each signatory to this Consent Order represents that he or she is fully authorized to enter into the terms and conditions of this Consent Order and to execute and bind legally the Party represented by him or her. Any change in ownership or corporate status of any De Minimis Respondent II, including, but not limited to, any transfer of assets or real or personal property, shall in no way alter such De Minimis Respondent II's responsibilities under this Consent Order.

IV. DEFINITIONS

3. Unless otherwise expressly provided herein, terms used in this Consent Order that are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in the statute or regulations. Whenever the terms listed below are used in this Consent Order, the following definitions shall apply:
 - a. "AOC I" or "De Minimis AOC I" shall mean the Administrative Order on Consent, Docket No. III-98-074-DC, by and between EPA and certain De Minimis PRPs ("De Minimis Respondents I") that became effective on or about September 28, 1999, in connection with the Site.
 - b. "CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601, et seq.
 - c. "Consent Order" or "Order" shall mean this Administrative Order on Consent and all appendices attached hereto. In the event of conflict between this Order and any appendix, the Order shall control.
 - d. "Day" shall mean a calendar day unless expressly stated to be a working day. "Working day" shall mean a day other than a Saturday, Sunday, or Federal holiday. In computing any period of time under this Consent Order, where the last day would fall on a Saturday, Sunday, or Federal holiday, the period shall run until the close of business of the next working day.
 - e. "De Minimis PRPs" shall mean all potentially responsible parties identified by EPA for the Site eligible to participate in a de minimis settlement, as listed in the Volumetric Ranking Summaries attached as Exhibit "C," and/or the New Volumetric Ranking Summary for the Second De Minimis Settlement attached as Exhibit "D."

- f. "EPA" shall mean the United States Environmental Protection Agency and any successor departments, agencies or instrumentalities.
- g. "EPA Hazardous Substance Superfund" shall mean the Hazardous Substance Superfund established by the Internal Revenue Code, 26 U.S.C. § 9507.
- h. "Future Response Costs" shall mean all Response Costs, including but not limited to direct and indirect costs, and recoverable costs of oversight of removal or remedial actions, that may be incurred by EPA in connection with the Site, after October 3, 2000, plus Interest on all such costs.
- i. "Hazardous Substance" shall have the meaning provided in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
- j. "Interest" shall mean interest at the current rate specified for interest on investments of the EPA Hazardous Substance Superfund established by 26 U.S.C. § 9507, compounded annually on October 1 of each year, in accordance with 42 U.S.C. § 9607(a).
- k. "National Contingency Plan" or "NCP" shall mean the National Oil and Hazardous Substances Pollution Contingency Plan promulgated pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, as set forth at 55 Fed. Reg. 8,666 (March 8, 1990), and codified at 40 C.F.R. Part 300, including any amendments thereto.
- l. "Natural Resources" shall have the meaning provided in Section 101(16) of CERCLA, 42 U.S.C. § 9601(16).
- m. "New Volumetric Ranking Summary for the Second De Minimis Settlement" or "New VRS" shall mean the list prepared by EPA and attached hereto as Exhibit "D," which sets forth each De Minimis Respondent II's total payment amount. The New VRS differs from the Volumetric Ranking Summaries dated 11/30/98 and attached hereto as Appendix "C" only in the cost numbers used by EPA to calculate each De Minimis Respondent II's payment amount. The New VRS and the 11/30/98 Volumetric Ranking Summaries do not differ in terms of methodology or volumetric information.
- n. "Paragraph" shall mean a portion of this Consent Order identified by an arabic numeral or an upper case letter.

- o. "Parties" shall mean EPA and the De Minimis Respondents II.
- p. "Past Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that EPA has paid at or in connection with the Site through October 3, 2000, plus Interest on all such costs which has accrued pursuant to 42 U.S.C. § 9607(a) through such date.
- q. "Remedial Costs" shall mean all response costs incurred in implementing the remedial action called for in the Record of Decision ("ROD") dated November 26, 1997, and/or any Explanation for Significant Differences ("ESD") and/or any amendment to that ROD, and/or any new ROD issued in place of that ROD.
- r. "Respondents II" or "De Minimis Respondents II" shall mean those persons, corporations, or other entities listed in Appendix "A," and successors and assigns of such persons, corporations, or other entities, that are signatories to this Consent Order.
- s. "Response Costs" shall mean all costs of "response" as that term is defined by Section 101(25) of CERCLA, 42 U.S.C. § 9601(25) incurred with respect to the Malvern TCE Site.
- t. "Section" shall mean a portion of this Consent Order identified by a roman numeral.
- u. "Site" shall mean the Malvern TCE Superfund Site, including areas defined in 40 C.F.R. § 300.400(e), located at and around 258 N. Phoenixville Pike in Malvern, Chester County, Pennsylvania and depicted more clearly on the map attached as Appendix "B."
- v. "United States" shall mean the United States of America, including its departments, agencies and instrumentalities.
- w. "Volumetric Ranking Summaries" shall mean those lists prepared by EPA in connection with the first de minimis settlement offered by EPA for the Site and resulting in AOC I. The Volumetric Ranking Summaries set forth each De Minimis PRP's volumetric shares and settlement amounts to be paid in order to participate in the De Minimis AOC I. These summaries are attached as Appendix "C."

V. EPA'S STATEMENT OF FACTS

4. The Site is located at and around 258 N. Phoenixville Pike, Malvern, East Whiteland Township, Chester County, Pennsylvania. A Transcontinental Gas Pipeline Co. natural gas pipeline right-of-way extends along the southern boundary of the Site, with residential areas and areas with natural forestation and vegetation bordering the property to the west, north and east. The approximate area of the Site is identified on the map attached as Appendix "B."
5. The Site includes, but is not limited to, a parcel of approximately 5-acres at which Chemclene Corporation ("Chemclene"), from 1952 until 1992, among other things, sold and reclaimed industrial cleaning solvents including trichloroethene ("TCE"), 1,1,1,-trichloroethane, perchloroethylene, and methylene chloride. These solvents were used by local industries for degreasing metal parts and other cleaning purposes. Chemclene used a distillation process to remove impurities from the chlorinated solvents. The distilled solvents were then returned to customers for reuse. The end products of processing waste solvents are the reclaimed solvents and chlorinated still bottoms. The chlorinated waste solvents are listed hazardous wastes pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 *et seq.*, and, therefore, the resulting still bottoms are listed hazardous waste. Wastes shipped to Chemclene were stored, processed, disposed, and bulk accumulated at the Site for eventual transfer to other locations, and a small amount was directly transshipped to other locations.
6. Chemclene utilized two areas of the Site, the Main Plant Area ("MPA") and the Former Disposal Area ("FDA"), as part of its business operations. Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including hazardous substances. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations. Chemclene disposed of wastes, including hazardous substances, at the FDA.
7. In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Chemclene facility. Private domestic wells and on-Site monitoring wells were sampled by Pennsylvania's Department of Environmental Resources and Chemclene in June 1980 and July 1981. Analytical results of this sampling revealed contamination of the underlying aquifer with chlorinated ethenes and related compounds.

8. Pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, EPA proposed the Site for listing on the National Priorities List ("NPL"), set forth at 40 C.F.R. Part 300, Appendix "B," by publication in the Federal Register. Final listing on the NPL as the Malvern TCE Superfund Site was in September 1983.
9. Hazardous substances have been or are threatened to be released at or from the Site, including, but not limited to, at or from the MPA and FDA at the Site.
10. Between 1981 and 1986, Chemclene commenced certain activities, including installation of filters on contaminated home wells located within a residential development south of the Chemclene property, FDA debris and drum removal and limited soil excavation, and removal of underground storage tanks and soil sampling at the MPA, to address EPA concerns of contamination at the Site. In 1987, Chemclene entered into a Corrective Action Order pursuant to RCRA (Docket No. RCRA-III-010-CA) with EPA. Chemclene did not complete a RCRA Facilities Investigation of the Site or implement corrective measures at the Site, as required by the RCRA Order.
11. As a result of the release or threatened release of hazardous substances, EPA has undertaken response actions at or in connection with the Site under Section 104 of CERCLA, 42 U.S.C. § 9604, and will undertake response actions in the future. Among other things, EPA:
 - a. assumed control of maintenance activities of filter units that had been installed on contaminated residential wells located south of the Site and of periodic sampling of residential wells;
 - b. upgraded residential well filter systems in response to analytical results from well samples that showed contamination was passing through the existing filters into the homes;
 - c. conducted and completed in January 1997 a Remedial Investigation of the Site;
 - d. completed a Feasibility Study of the Site in June 1997; and
 - e. issued a Record of Decision in November 1997 pursuant to which EPA selected a remedy to be implemented at the Site.
12. In performing these response actions, EPA has incurred and will continue to incur response costs. As of October 3, 2000, EPA had incurred \$4,776,948.97 in Past Response Costs. EPA may incur Future Response Costs at the Site.

13. EPA has reviewed records describing the transactions of PRPs, including the De Minimis PRPs, in relation to the Site. These records include information describing the amount and nature of waste contributed to the Site. Based upon that review, EPA has determined that each De Minimis PRP, including each De Minimis Respondent II listed in Appendix "A," arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, of a hazardous substance owned or possessed by such De Minimis Respondent II, at the Site, or accepted a hazardous substance for transport to the Site.
14. Information currently known to EPA indicates that each De Minimis PRP, including each De Minimis Respondent II listed in Appendix "A," contributed between 1.6 drums and 0.75% of the total waste sent to the Site, and that the toxic or other hazardous effects of the hazardous substances contributed by each De Minimis PRP, including each De Minimis Respondent II, to the Site are not significantly more toxic than the other hazardous substances at the Site. The Volumetric Ranking Summaries ("VRS") (Appendix "C") and New Volumetric Ranking Summary for the Second De Minimis Settlement ("New VRS")(Appendix "D") prepared for the Site list, among other things, the estimated volume of waste contributed to the Site by each De Minimis PRP, including each De Minimis Respondent II, and the percentage of waste contributed to the Site by each Respondent in relation to the total estimated volume of waste sent to the Site during the 1968 to 1992 time period. The volumes and percentage shares presented in the VRS and New VRS represent EPA's best estimates and are based on all information currently in EPA's possession.
15. EPA has estimated that the total response costs incurred and to be incurred at or in connection with the Site by the EPA Hazardous Substance Superfund and by private parties is \$20,506,099.97. This amount includes \$4,776,948.97 in response costs incurred by EPA through October 3, 2000, and Future Response Costs in the amount of \$15,729,151.00 (estimated future Site remedial costs in the amount of \$15,529,151.00, and EPA future remedial oversight costs estimated to be \$200,000.00). EPA has received certain information that indicates these estimated remedial costs could be revised.
16. The total payment required to be made by each De Minimis Respondent II pursuant to this Consent Order is set forth in the New Volumetric Ranking Summary for the Second De Minimis Settlement, attached as Appendix "D." The total payment to be made by each De Minimis Respondent II represents a minor portion of this total response costs incurred and to be incurred at or in connection with the Site, as referenced in Paragraph 15 of this Consent Order.

17. EPA has identified PRPs other than De Minimis Respondents II, who owned or operated the Site, or who arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, at the Site, of a hazardous substance owned or possessed by such persons.

VI. DETERMINATIONS

18. Based upon the Statement of Facts set forth above and on the administrative record for this Site, EPA has determined that:
- a. the Site is a "facility" as that term is defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).
 - b. each De Minimis Respondent II is a "person" as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).
 - c. each De Minimis Respondent II is liable within the meaning of Sections 107(a) and 122(g)(1) of CERCLA, 42 U.S.C. §§ 9607(a) and 9622(g)(1).
 - d. the materials shipped to the Site by the De Minimis Respondents II include "hazardous substances" within the meaning of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14).
 - e. the past, present or future migration of hazardous substances from the Site constitutes an actual or threatened "release" as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).
 - f. the Past Response Costs incurred and Future Response Costs to be incurred in connection with the Site are removal and remedial response costs within the meaning of Section 107(a) of CERCLA, 42 U.S.C. § 9607(a).
 - g. prompt settlement with each De Minimis Respondent II is practicable and in the public interest within the meaning of Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1).
 - h. as to each De Minimis Respondent II, this Consent Order involves only a minor portion of the response costs at the Site within the meaning of Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1).
 - i. each De Minimis Respondent II is eligible for a de minimis settlement pursuant to Section 122(g)(1)(A) of CERCLA, 42 U.S.C. § 9622(g)(1)(A).

since both the amount and the toxicity or other hazardous effects of the hazardous substances contributed to the Site by each De Minimis Respondent II is minimal in comparison to other hazardous substances at the Site.

VII. ORDER

19. Based on the foregoing Statement of Facts and Determinations by EPA, in order to reach an expedited de minimis settlement in connection with the Site, in consideration of, and in exchange for, the promises, mutual undertakings, and covenants set forth herein, and intending to be legally bound hereby, EPA and the De Minimis Respondents II agree, and EPA hereby Orders, that the De Minimis Respondents II shall pay their cost share as set forth below:
- a. Within thirty (30) days of the effective date of this Order, each De Minimis Respondent II shall pay its volumetric share of the cost basis of \$20,506,099.97 (\$4,776,948.97 in Past Response Costs; and \$15,729,151.00 in Future Response Costs, which include EPA future remedial oversight costs in the amount of \$200,000.00). The amount to be paid by each settling De Minimis Respondent II is set forth under the Total Payment Column included in the New Volumetric Ranking Summary for the Second De Minimis Settlement, attached as Appendix "D."
 - b. The de minimis settlement payment required of each De Minimis Respondent II, as referred to in Paragraph 19.a. of this Order, also includes a settlement premium. This premium is designed to cover risks and uncertainties associated with this settlement, including but not limited to, the risk that total response costs incurred or to be incurred at or in connection with the Site by the EPA Hazardous Substance Superfund, or by any private party incurring Remedial Costs, will exceed the estimated total response costs, upon which Respondent's payments are based. However, the premium is not designed to cover the risk that Remedial Costs will exceed \$25 million, and consequently, the Covenant Not to Sue is subject to the Reservation of Rights in Paragraph 28.
 - c. De Minimis Respondents II, Maida Development Corporation and McHugh Railroad Maintenance Equipment Company, as identified in Appendix "D," were previously offered by EPA an opportunity to participate in AOC I, but did not participate in that settlement.

- d. De Minimis Respondents II, American Electronics Laboratories, Boekel Scientific Industries, Inc., Elco Corporation, Ervins Crafts, Photofabrication Chemical and Equipment Company, and R & E Martin, previously were offered by EPA an opportunity to participate in AOC I; however, EPA's records do not reflect that this occurred.

VIII. PAYMENT

20. Payments by De Minimis Respondents II shall be made as follows:
- a. Within thirty (30) days of the effective date of this Consent Order, each De Minimis Respondent II shall pay the amount listed for the De Minimis Respondent II in the New Volumetric Ranking Summary for the Second De Minimis Settlement, attached as Appendix "D" to this Consent Order and as specified in Section VII (Order), above.
 - b. Any De Minimis Respondent II may make payment in two equal installments, the first due and payable within thirty (30) days of the effective date of this Consent Order, and the second due and payable within one year of the effective date of the Consent Order.
 - c. Each payment shall be made by certified or cashier's check made payable to "EPA Hazardous Substance Superfund." Each check shall reference the *name and address of the party making payment, the Site name, the EPA Region and Site Spill ID Number 03-91, and the EPA Docket Number for this action, and shall be sent to:*

EPA Superfund
U.S. EPA/Region III
Attention: Superfund Accounting
P.O. Box 360515
Pittsburgh, PA 15251-6515
 - d. At the time of payment, each De Minimis Respondent II shall send notice that such payment has been made to:

Charlie Root (3HS21)
Remedial Project Manager
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029

21. EPA shall deposit any de minimis settlement proceeds received into a Malvern TCE Superfund Site special account within the EPA Hazardous Substance Superfund. The proceeds can be retained and used by EPA, or by a party designated by EPA, to conduct or finance response action at or in connection with the Site and/or, at EPA's discretion, can be transferred to the EPA Hazardous Substance Superfund as reimbursement for response costs incurred at or in connection with the Site by the EPA Hazardous Substance Superfund. Any amounts remaining in a Malvern TCE Superfund Site special account shall be transferred by EPA to the EPA Hazardous Substance Superfund.
22. Any amounts due and owing by a De Minimis Respondent II pursuant to the terms of this Consent Order but not paid in accordance with the terms of this Consent Order shall accrue Interest, as defined in Paragraph 3.j. of this Consent Order, which shall be assessed to such De Minimis Respondent II.

IX. FAILURE TO MAKE PAYMENT

23. If any De Minimis Respondent II fails to make any payment under the terms of this Consent Order within thirty (30) days of the payment becoming due, this Consent Order shall be terminated and the Covenant Not to Sue set forth in Section XI, Paragraph 27, shall become null and void as to that De Minimis Respondent II.
24. Nothing in this Consent Order shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of a Respondent's violation of this Order or of the statutes and regulations upon which it is based, including, but not limited to, penalties pursuant to Section 122(l) of CERCLA, 42 U.S.C. § 9622(l).

X. CERTIFICATION OF RESPONDENTS

25. By signing this Consent Order, each De Minimis Respondent II certifies, individually, that, to the best of its knowledge and belief, it has:
 - a. conducted a thorough, comprehensive, good faith search for documents, and that to the best of its knowledge and belief, such De Minimis Respondent II has no information which would result in a material change of the information set forth in the VRS and New VRS. For purposes of this provision, a material change of the information set forth in the VRS and New VRS would occur if any PRP's Main Plant Area Percentage or Former Disposal Area Percentage listed in the VRS and New VRS

changes by more than ten percent (10%). A material change of the information set forth in the VRS and New VRS also would include any information that results in an increase in the MPA% for any PRP identified in the VRS and New VRS to greater than 0.75%:

- b. not altered, mutilated, discarded, destroyed or otherwise disposed of any records, documents, or other information relating to its potential liability regarding the Site after notification of potential liability or the filing of a suit against it regarding the Site; and
 - c. fully complied with any and all EPA requests for information regarding the Site pursuant to Sections 104(e) and 122(e) of CERCLA, 42 U.S.C. §§ 9604(e) and 9622(e) and Section 3007 of RCRA, 42 U.S.C. § 6927.
26. If this certification is subsequently determined to be false, such De Minimis Respondent II shall forfeit all payments made pursuant to Section VIII of this Consent Order. Such forfeiture shall not constitute liquidated damages and shall not in any way foreclose the United States' right to pursue any other causes of action arising from such De Minimis Respondent II's false certification. Providing false, fictitious, or fraudulent statements or representations to the United States is punishable as a crime under 18 U.S.C. § 1001.

XI. COVENANT NOT TO SUE BY UNITED STATES

27. In consideration of the payments that will be made by the De Minimis Respondents II under the terms of this Consent Order, and except as specifically provided in Section XII (Reservations of Rights by United States), the United States covenants not to sue or take administrative action against any of the De Minimis Respondents II for civil liability for reimbursement of Response Costs or for injunctive relief pursuant to Sections 106 or 107 of CERCLA, 42 U.S.C. §§ 9606 or 9607, or for injunctive relief pursuant to Section 7003 of the RCRA, 42 U.S.C. § 6973, with regard to the Site. With respect to present and future liability, this covenant not to sue shall take effect for each De Minimis Respondent II upon receipt of that De Minimis Respondent II's payment as required by Section VIII. With respect to each De Minimis Respondent II, individually, these covenants are conditioned upon complete performance by such De Minimis Respondent II of all obligations under this Consent Order, and the veracity and completeness of the information provided to EPA by such De Minimis Respondent II relating to each De Minimis Respondent II's involvement with the Site. These covenants shall be null and void with respect to any individual De Minimis Respondent II that fails to perform all obligations under this Consent Order in a timely and complete manner, or has provided materially false, incomplete, or incorrect information in

such De Minimis Respondent II's Certification under Section X of this Consent Order. These covenants extend only to De Minimis Respondents II and do not extend to any other person.

XII. RESERVATIONS OF RIGHTS BY UNITED STATES

28. The United States expressly reserves, and nothing in this Consent Order is intended to be nor shall it be construed as a release or covenant not to sue for, any claim or cause of action, administrative or judicial, civil or criminal, past or future, at law or in equity, which the United States, including EPA, may have against any of the De Minimis Respondents II for:
- a. any liability as a result of failure to make the payments required by Section VIII (Payment by De Minimis Respondents II), or otherwise comply with the terms of this Consent Order;
 - b. liability arising from the past, present, or future disposal, release or threat of release of hazardous substances at any facility, as defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), other than the Site;
 - c. any matters not expressly included in Section XI above (Covenant Not to Sue by the United States);
 - d. liability for damages for injury to, destruction of or loss of natural resources, and for the costs of any natural resource damage assessments;
 - e. liability for response costs relating to the Site that have been or may be incurred by Natural Resource trustees, including, but not limited to, the Department of Interior, of the United States;
 - f. criminal liability;
 - g. liability of any De Minimis Respondent II for violations of federal or state law; or
 - h. any liability for Remedial Costs in excess of \$25 million.
29. Nothing in this Consent Order constitutes a covenant not to sue or to take action or otherwise limits the ability of the United States to seek or obtain further relief from any De Minimis Respondent II, and the covenant not to sue set forth above and the contribution protection provided below will become null and void as to any individual De Minimis Respondent II, if:

- a. such De Minimis Respondent II contributed more than 0.75% of the total volume of the hazardous substances at the Site or contributed to the Site hazardous substances which contributed disproportionately to the cumulative toxic or other hazardous effects of the hazardous substances at the Site;
- b. such De Minimis Respondent II fails to make any payment under the terms of this Consent Order; and/or,
- c. such De Minimis Respondent II's certification in Section X of this Order is false or materially inaccurate.

XIII. COVENANT NOT TO SUE BY RESPONDENTS

30. De Minimis Respondents II covenant not to sue and agree not to assert any claims or causes of action against the United States or its contractors or employees with respect to the Site or this Consent Order including, but not limited to:
 - a. Any direct or indirect claim for reimbursement from the EPA Hazardous Substance Superfund based on Sections 106(b)(2), 107, 111, 112, or 113 of CERCLA, 42 U.S.C. §§ 9606(b)(2), 9607, 9611, 9612, or 9613, or any other provision of law;
 - b. any claims arising out of response activities at the Site; and
 - c. any claim against the United States pursuant to Sections 107 and 113 of CERCLA, 42 U.S.C. §§ 9607 and 9613, relating to the Site.
31. Nothing in this Consent Order shall be deemed to constitute preauthorization or approval of a claim within the meaning of Section 111 of CERCLA, 42 U.S.C. § 9611, or 40 C.F.R. § 300.700(d).

XIV. EFFECT OF SETTLEMENT/CONTRIBUTION PROTECTION

32. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a party to this Consent Order. The preceding sentence shall not be construed to waive or nullify any rights that any person not a signatory to this Consent Order may have under applicable law. The United States and the De Minimis Respondents II each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims,

demands, and causes of action which each party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a party hereto.

33. EPA and the De Minimis Respondents II agree that the actions undertaken by De Minimis Respondents II in accordance with this Consent Order do not constitute an admission of any liability by any De Minimis Respondent II. The De Minimis Respondents II do not admit, and retain the right to controvert in any subsequent proceedings, other than proceedings brought by the United States to implement or enforce this Consent Order, the validity of the Statement of Facts or Determinations contained in this Consent Order.
34. The De Minimis Respondents II agree that with respect to any suit or claim for contribution brought by them for matters related to this Consent Order they will provide notification to EPA in writing no later than sixty (60) days prior to the initiation of such suit or claim. The De Minimis Respondents II also agree that with respect to any suit or claim for contribution brought against them for matters related to this Consent Order they will provide notification to EPA in writing within ten (10) days of service of the complaint on them. In addition, De Minimis Respondents II shall notify EPA within ten (10) days of receipt of any order from a court setting any such case for trial.
35. In any subsequent administrative or judicial proceeding initiated by the United States for *injunctive relief, recovery of response costs, or other appropriate relief* relating to the Site, De Minimis Respondents II shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, res judicata, collateral estoppel, issue preclusion, claim-splitting, or other defenses based upon any contention that the claims raised by the United States in the subsequent proceeding were or should have been brought in the instant case; provided, however, that nothing in this Paragraph affects the enforceability of the covenants not to sue set forth in Section XI (Covenants Not to Sue by the United States).
36. Subject to the Reservation of Rights in Section XII of this Order, each De Minimis Respondent II, by entering into and complying with the terms of this Consent Order, is entitled to protection from contribution actions or claims as provided by Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(g)(5), for “matters addressed” in this Consent Order. The “matters addressed” in this Consent Order are all response actions taken by the United States and by private parties, and all response costs incurred and to be incurred by the United States, including Past Response Costs and Future Response Costs, as such terms are defined in Paragraphs 3(p) and 3(h) of this Consent Order, and by private parties, at or in connection with the Site. The “matters addressed” in this settlement do not include those response costs or response

actions as to which the United States has reserved its rights under this Consent Order (except for claims for failure to comply with this Consent Order), in the event that the United States asserts rights against De Minimis Respondents II coming within the scope of such reservations.

XV. OPPORTUNITY FOR PUBLIC COMMENT

37. This Consent Order shall be subject to a thirty-day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i), and Section 7003(d) of RCRA, 42 U.S.C. § 6973(d). EPA shall provide notice, and an opportunity for a public meeting in the affected area on the proposed settlement in accordance with Section 7003(d) of RCRA, 42 U.S.C. § 6973 (d). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. § 9622(i)(3), EPA may withdraw or withhold its consent to this Consent Order if comments received disclose facts or considerations which indicate that this Consent Order is inappropriate, improper or inadequate.

XVI. ATTORNEY GENERAL APPROVAL

38. In accordance with Section 122(g)(4) of CERCLA, this Consent Order shall not become effective without the prior written approval of the Attorney General or his designee.

XVII. COSTS AND FEES

39. De Minimis Respondents II shall bear their own costs and attorney's fees regarding this matter. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a Party to this Consent Order. The United States and De Minimis Respondents II each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims, demands, and causes of action which each Party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a Party hereto.

XVIII. INTEGRATION/APPENDICES

40. This Consent Order and its appendices constitute the final, complete and exclusive agreement and understanding among the Parties with respect to the settlement embodied in this Consent Order. The Parties acknowledge that there are no representations, agreements or understandings relating to the settlement other than those expressly contained in this Consent Order. The following appendices are attached to and incorporated into this Consent Order:

"Appendix A" -- List of De Minimis Respondents II

"Appendix B" -- Map of the Site

"Appendix C" -- Volumetric Ranking Summaries (Showing Volumes and Payment Amounts)

"Appendix D" -- New Volumetric Ranking Summary for the Second De Minimis Settlement

XIX. EFFECTIVE DATE

41. The effective date of this Consent Order shall be the date upon which EPA issues written notice to De Minimis Respondents II that the public comment period pursuant to Paragraph 37 has closed and that comments received, if any, do not require modification of or EPA withdrawal from this Consent Order.

IT IS SO AGREED AND ORDERED:

U.S. Environmental Protection Agency:

By: _____
Thomas C. Voltaggio
Acting Regional Administrator, Region III

Date

THE UNDERSIGNED RESPONDENT enters into this Consent Order in the matter of [insert U.S. EPA docket number], relating to the Malvern TCE Superfund Site, 258 N. Phoenixville Pike, Malvern, Pennsylvania.

FOR RESPONDENT: _____
[Name]

[Address]

By: _____
[Signature]

[Date]

[Type name and Title]

De Minimis Respondent opts to pay in two equal installments, as provided for in Paragraph 19 of this Consent Order:

Yes

No

Appendix A

Appendix A

De Minimis Parties Eligible for Settlement

American Electronics Laboratory

c/o BAE Systems
Patrick S. Till, Environmental/Safety Engineer
305 Richardson Road
Lansdale, PA 19446

Boekel Industries

c/o Boekel Scientific Industries
Mark Davies
855 Pennsylvania Ave
Feasterville, PA 19053

Ervins Crafts

c/o Irvin's Craft Shop
Irvin Hoover
RR#1, Box 73
Mount Pleasant Mills, PA 17853

c/o Robert Hoffman, Esq.
Reed, Smith
P.O. Box 11844
Harrisburg, PA 17108

Elco Corporation

Dennis Oldland, Corporate Environmental Safety and Security
801 17th Avenue South
P.O. Box 861
Myrtle Beach, SC 29577

c/o Phillip L. Hinerman, Esq.
Fox, Rothchild, O'Brien & Frankel, LLP
2000 Market Street, 10th Floor
Philadelphia, PA 19103-3291

K-D Tool Manufacturing

c/o Danaher Tool Group
Robert Daveny, President
805 Estelle Drive
Lancaster, PA 17601

c/o Phillip L. Hinerman, Esq.
Fox, Rothchild, O'Brien & Frankel, LLP
2000 Market Street, 10th Floor
Philadelphia, PA 19103-3291

Maida Development Company

20 Libbey Street
Hampton, VA 23663

c/o Chip Gauch, Esq.
Hunton & Williams
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219-4074

McHugh Railroad Maintenance Equipment Company

James McHugh, CEO
Box 6
Fairless Hills, PA 19030

c/o Gerald Hughes, Esq.
850 Bare Tavern Road
West Trenton, NJ 08628

Photofabrication Chemical and Equipment Company

522 Lancaster Avenue
Malvern, PA 19355

c/o Phillip L. Hinerman, Esq.
Fox, Rothchild, O'Brien & Frankel, LLP
2000 Market Street, 10th Floor
Philadelphia, PA 19103-3291

R & E Martin, Inc.

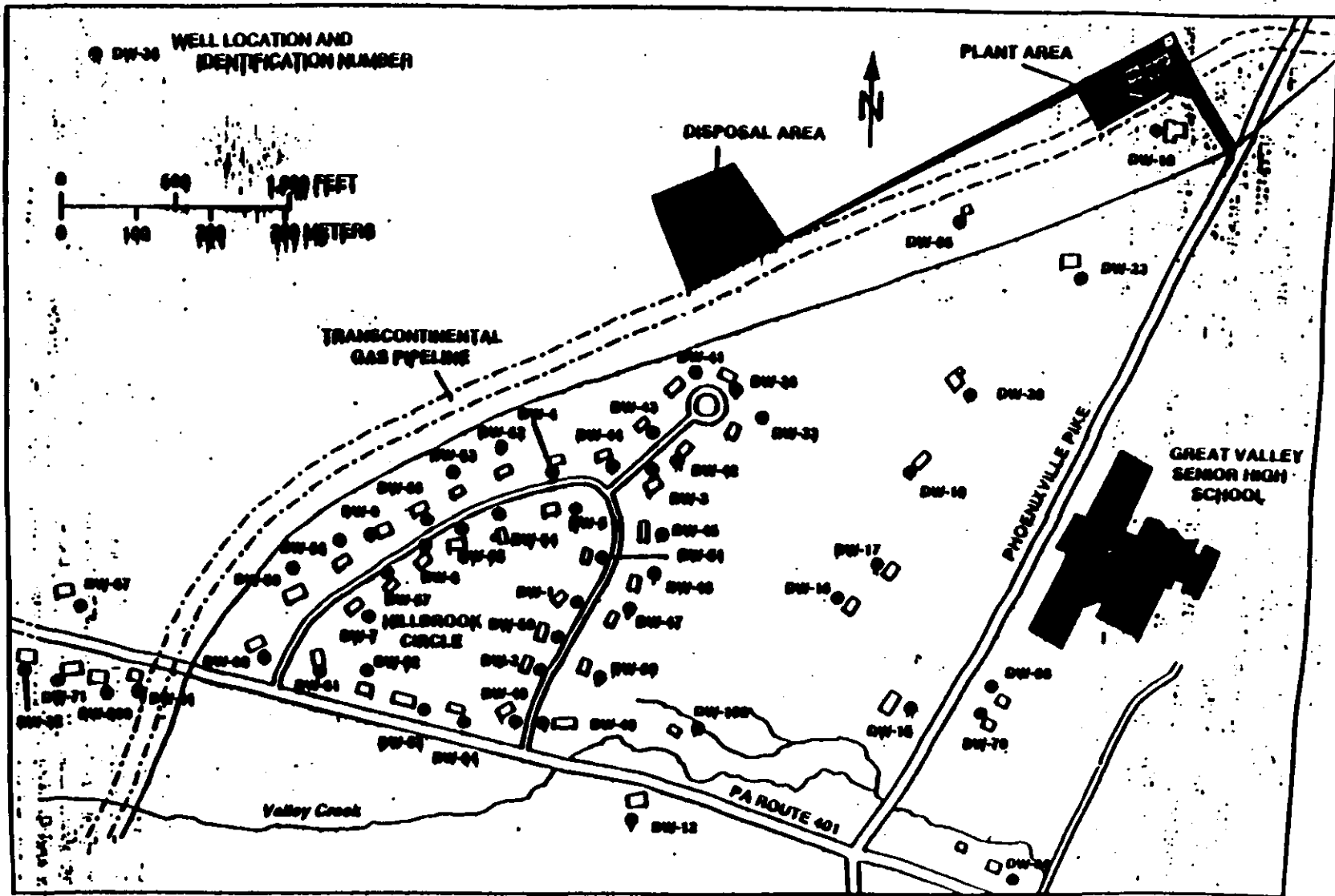
Richard Martin II, CEO
P.O. Box 4701
Philadelphia, PA 19134

c/o Phillip L. Hinerman, Esq.
Fox, Rothchild, O'Brien & Frankel, LLP
200 Market Street
Philadelphia, PA 19103-3291

Technitrol, Inc.

Larry Gaudino, Director of Environmental Services
1003 Corporate Lane
Export, PA 15632

Appendix B



HALVERN TCE SITE MAP

AR000089

Appendix C

**Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.¹

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums¹ received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

³ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

AR000108

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
A. Duie Pyle						1.00	0.00%	0.00%			D
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Ace Service Corp.						1.00	0.00%	0.00%			D
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Albright Paper & Box Corp.						1.11	0.00%	0.00%			D
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000109

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Amuneal Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Antenna Corp.						1.00	0.00%	0.00%			D
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Aydin						251.82	0.91%	0.94%			A
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Beckett Corporation						250.55	0.91%	0.94%			A
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Bilgram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Boekef Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Boyerstown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401

* Superceding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000110

Malvern TCF Refund Site
 Generator Volume Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Budd Co.						0.36	0.00%	0.00%			D
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Burroughs Corp.	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.06	0.14%	0.15%	\$12,958	\$5,653	\$66,349
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cabot Grouping						401.00	1.46%	1.60%			A
Cabot Beryco						143.00	0.52%	0.54%			A
Cabot Wrought Products						27.00	0.10%	0.10%			A
Cabot Company						13.00	0.05%	0.05%			A
Kawecki Beryco						218.00	0.79%	0.82%			A
Camdel Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Cantol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Carvel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Chester County Intermediate Unit						0.07	0.00%	0.00%			D
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
Cincinnati Time						1.00	0.00%	0.00%			D
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000111

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Defense Reutilization & Marketing Grouping						349.98	1.27%	1.31%			A
Madison, IN						13.00	0.05%	0.05%			A
DRMS/PNSY						200.72	0.73%	0.75%			A
DRMO PHILADELPHIA						54.00	0.20%	0.20%			A
Picatinny Arsenal						8.26	0.03%	0.03%			A
DRMO Knox						74.00	0.27%	0.28%			A
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Delbar Products						328.50	1.19%	1.23%			A
Delco Wire & Cable, Inc./ Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B
Delmaco Mfg Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000112

**Malvern TCE Superfund Site
Generator Volume Ranking Summary*
(By Alphabetical Listing)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Detra Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Devon Apparel						1.00	0.00%	0.00%			D
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Durawood						1.00	0.00%	0.00%			D
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E. I. T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
Electro Tech Systems Inc.						1.00	0.00%	0.00%			D
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Ellisco						8.36	0.03%	0.03%	\$2,718	\$1,186	\$3,903
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
Ervins Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ext -Corporal						4.00	0.01%	0.00%	\$0	\$0	B

* Superseding 4/27/98 VRS

- A De maximus party and does not qualify for de minimis settlement offer.
- B Party has been identified as an orphan.
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary
- D De micromis party

AR000113

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fairchild Space Systems						1.00	0.00%	0.00%			D
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Fergusson						5.96	0.02%	0.02%	\$1,938	\$845	\$2,783
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

AR000114

Malvern TCE Refund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
H I Services Inc.						1.00	0.00%	0.00%			D
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Hamilton Watch Co.	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Handy & Harman Tube Co. Inc						229.18	0.83%	0.86%			A
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Hough/Loew Associates						1.09	0.00%	0.00%			D
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
J & J Spill						43.00	0.16%	0.16%			C
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695
Jenson, Homer						0.36	0.00%	0.00%			D
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000115

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Alphabetical Listing)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Kim Manufacturing						283.00	1.03%	1.06%			A
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Kuticke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
Lightman Drum Co.						0.27	0.00%	0.00%			C
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Lovekin Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
M Q S Inspection Inc./Magnaflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
Mack Electric						0.27	0.00%	0.00%			D
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
Manorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party

AR000116

Malvern TCE Refund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Mars Money Systems						1.00	0.00%	0.00%			D
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Met Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Morning Call						355.00	1.29%	1.33%			A
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
National Computer Systems						1.00	0.00%	0.00%			D
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
National Products						1.00	0.00%	0.00%			D
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669

* Superseding 4/27/98 VRS

- A *De maximus* party and does not qualify for *de minimis* settlement offer.
- B Party has been identified as an orphan.
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.
- D *De micromis* party

AR000117

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Alphabetical Listing)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
North Industrial Chemicals						60.00	0.22%	0.22%			C
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Pennwalk Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Perkin-Elmer						1.00	0.00%	0.00%			D
Permutit/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

AR000118

Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Photolastic Inc.	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
Plate Crafters Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plymouth Tube	9.00	0.39%	0.40%			566.37	2.05%	2.12%			A
Pocono Foundry Inc.						1.00	0.00%	0.00%			D
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Porter Instruments						228.27	0.83%	0.85%			A
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
R & E Martin, Inc.						116.29	0.42%	0.44%			C
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
R C Kletzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Reilly Plating						430.00	1.56%	1.61%			A
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
S K F Industries Inc.						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267

* Superceding 4/27/98 VRS

A *De maximus* party and does not qualify for *de minimis* settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D *De micromis* party

AR000119

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Alphabetical Listing)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Schmidt Brewery Co.						1.00	0.00%	0.00%			D
Schramm Inc.						1.00	0.00%	0.00%			D
Scolco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Sikkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Simonetta Brothers						53.28	0.19%	0.00%	\$0	\$0	B
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solatario						57.00	0.21%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Glass Products						1.00	0.00%	0.00%			D
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000120

Malvern TCE Superfund Site
Generator Volume Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Suatemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Syntex/Star Grouping						725.00	2.63%	2.72%			A
Syntex Dental Products						115.00	0.42%	0.43%			A
Star Dental Corporation						610.00	2.21%	2.28%			A
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
T R W Inc.						0.45	0.00%	0.00%			D
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$4,418	\$64,341
Tele Dynamics						8.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			D
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Tube Methods						1.00	0.00%	0.00%			D

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000121

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Alphabetical Listing)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Tudor Tech Inc.						1.00	0.00%	0.00%			D
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
USG Grouping						686.48	2.12%	2.20%			A
U S G Interiors						182.00	0.66%	0.68%			A
Floor Systems Inc.						71.40	0.26%	0.27%			A
Donn Corporation						292.00	1.06%	1.09%			A
Davey Products						41.00	0.15%	0.15%			A
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Tape & Label Co						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Waste Conversion						104.00	0.38%	0.39%			C
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Welding Co.						1.00	0.00%	0.00%			D
Welex Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Witronics						0.30	0.00%	0.00%			D
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

AR000122

**Malvern TCE Refund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
De Minimis Total:	673.00	25.09%	23.48%	\$2,158,627	\$950,287	8054.37	36.69%	33.51%	\$2,796,132	\$1,219,287	\$7,123,333
Total:	2283.71	100.00%	100.00%			27608.87	100.00%	100.00%			

AR000123

* Superseding 4/27/98 VRS

- A De maximus party and does not qualify for de minimis settlement offer.
- B Party has been identified as an orphan.
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.
- D De minimis party

**Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.¹

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies, therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums² received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

³ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

AR000091

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Western Electric	138.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.58%	3.68%			A
Hamilton Watch Co.	197.00	8.63%	8.61%			904.00	3.27%	3.39%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Syntex/Star Grouping											
Star Dental Corporation						610.00	2.21%	2.28%			D, A
Plymouth Tube	9.00	0.38%	0.40%			566.37	2.05%	2.12%			A
Armstrong Cork Co						522.70	1.89%	1.96%			A
Burroughs Corp	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Cyprus Foote Mineral Co						495.00	1.79%	1.85%			A
Resource Technology Services, Inc						473.72	1.72%	1.77%			C, A
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Reddy Plating						430.00	1.56%	1.61%			A
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
N W Controls	4.00	0.18%	0.18%			374.58	1.36%	1.40%			A
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Morning Call						355.00	1.29%	1.33%			A
Delbar Products						328.50	1.19%	1.23%			A
USG Grouping											
Donn Corporation						292.00	1.06%	1.09%			D, A

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If a company appears under a grouping, please refer to the combined entities throughout the Alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000092

Malvern TCE Refund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Kim Manufacturing						283.00	1.03%	1.06%			A
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Aydin						251.82	0.91%	0.94%			A
Beckett Corporation						250.55	0.91%	0.94%			A
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Handy & Harman Tube Co. Inc.						229.18	0.83%	0.86%			A
Porter Instruments						228.27	0.83%	0.85%			A
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
Cabot Grouping											
Kaweciu Berylco						218.00	0.79%	0.82%			D, A
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918
Defense Reutilization & Marketing Grouping											
DRMS/PNSY						200.72	0.73%	0.75%			D, A
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912

* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

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D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000093

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
USG Grouping											
U S G Interiors						182.00	0.66%	0.68%			D, A
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.68%	\$57,542	\$25,101	\$273,594
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
Cabot Grouping											
Cabot Berylco						143.00	0.52%	0.54%			D, A
Steen Seal Co						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
S K F Industries Inc						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
F B F Industries Inc						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
R & E Martin, Inc.						116.29	0.42%	0.44%			C
Syntex/Star Grouping											
Syntex Dental Products						115.00	0.42%	0.43%			D, A
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E orms party

AR000094

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Waste Conversion						104.00	0.38%	0.39%			C
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
J W Rex Co	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Aston-Hill Co						74.00	0.27%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping											
DRMO Knox						74.00	0.27%	0.28%			D, A
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809
USG Grouping											
Floor Systems Inc.						71.40	0.26%	0.27%			D, A

* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De micromis party

AR000095

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
Scolco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Zenith Products Corp						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Welex Inc						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
North Industrial Chemicals						60.00	0.22%	0.22%			C
Graphic Packaging Corp						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping											
DRMO PHILADELPHIA						54.00	0.20%	0.20%			D, A
Simonetta Brothers						53.28	0.19%	0.00%	\$0	\$0	B
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Arik Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Delco Wire & Cable, Inc / Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B

* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D Company appears under a grouping, please refer to the combined entities through alphabetical Volumetric Ranking Summary

E De minimis party.

AR000096

Malvern TCE Refund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
M Q S Inspection Inc./Magnaflex						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
J & J Spill						43.00	0.16%	0.16%			C, A
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
USG Grouping											
Devey Products						41.00	0.15%	0.15%			D, A
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
C S S International Corp	8.00	0.35%	0.36%	\$33,148	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Asplundh Manufac. Co						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Carvel Hill Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Manographics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201
Alster Mig.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194

* Superceding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De micromis party

AR000097

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Phila Electric Co. Oregon Marit. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Cabot Grouping											
Cabot Wrought Products						27.00	0.10%	0.10%			D, A
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140

AR000098

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If a company appears under a grouping, please refer to the combined entities through the alphabetical Volumetric Ranking Summary

E De minimis party

Malvern TCE erfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Sweda/Lifton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Amuneeal Mfg. Co						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Camdel Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
United Chem-Con Corp						21.00	0.08%	0.00%	\$0	\$0	B
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Cantol Inc						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
U S Electronic Services Corp	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
Delltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
David K. Robson, Inc						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Sikkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

* Superceding 4/27/98 VRS

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B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De micromis party

AR000099

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
C K Systematics, Inc						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cobra Wire & Cable Co						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Pennwall Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Transducer Systems Inc						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Olympic Tool & Machine Co						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plate Crafters Inc						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Sharples, Inc						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Diversified Electronic Corp						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Hural Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Boekel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070

AR000100

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D If company appears under a grouping, please refer to the combined entities throughout alphabetical Volumetric Ranking Summary

E De minimis party

Malvern TCE refund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Cabot Grouping											
Cabot Company						13.00	0.05%	0.05%			D, A
Defense Reutilization & Marketing Grouping											
Madison, IN						13.00	0.05%	0.05%			D, A
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Crown Marketing Equipment Co						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formation Inc						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Techalloy Inc						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Photolastic Inc	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Delta Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
Agitar, Div of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B

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D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De micromis party

AR000101

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Suntemp Industries	9.00	0.38%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Elisico						8.38	0.03%	0.03%	\$2,718	\$1,186	\$3,903
Defense Reutilization & Marketing Grouping											
Picatinny Arsenal						8.26	0.03%	0.03%			D, A
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Penske V D A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Herman Goldner Co. Inc.						7.00	0.03%	0.03%	\$2,305	\$1,005	\$3,310
Bigram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B

* Superceding 4/27/98 VRS

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D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E De minimis party

AR000102

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Met Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Silvane						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lovelun Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Phlco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Tels Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Ferguson						5.98	0.02%	0.02%	\$1,938	\$845	\$2,783
Boyerlown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Duon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ervin Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

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E De micromis party

AR000103

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E. Hopkins Co						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Ext - Corporol						4.00	0.01%	0.00%	\$0	\$0	B
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868

AR000104

* Superceding 4/27/98 VRS

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B Party has been identified as an orphan

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D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E De minimis party

Malvern TCE refund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sterling Fleishman Co						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
A. Johnson & Co., Inc						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Glah Bros., Inc						3.00	0.01%	0.01%	\$975	\$425	\$1,401
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
L & S Tool and Machine Co						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Permut/Sytron Corp						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Industrial Systems Design						2.84	0.01%	0.00%	\$0	\$0	B
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
R C Kietzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167

* Superseding 4/27/98 VRS

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E De minimis party

AR000105

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Delmaco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Pepco Manufacturing Co						2.00	0.01%	0.01%	\$650	\$284	\$934
Peter Paul Cadbury Co						2.00	0.01%	0.01%	\$650	\$284	\$934
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Albright Paper & Box Corp						1.11	0.00%	0.00%			E
Hough/Loew Associates						1.09	0.00%	0.00%			E
A. Dae Pyle						1.00	0.00%	0.00%			E
Ace Service Corp.						1.00	0.00%	0.00%			E
Antenna Corp.						1.00	0.00%	0.00%			E
Cincinnati Time						1.00	0.00%	0.00%			E
Devon Apparel						1.00	0.00%	0.00%			E
Durawood						1.00	0.00%	0.00%			E
Electro Tech Systems Inc.						1.00	0.00%	0.00%			E
Fairchild Space Systems						1.00	0.00%	0.00%			E
H I Services Inc.						1.00	0.00%	0.00%			E

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E De minimis party

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Malvern TCE Refund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Money Systems						1.00	0.00%	0.00%			E
National Computer Systems						1.00	0.00%	0.00%			E
National Products						1.00	0.00%	0.00%			E
Perkin-Elmer						1.00	0.00%	0.00%			E
Pocono Foundry Inc.						1.00	0.00%	0.00%			E
Schmidt Brewery Co.						1.00	0.00%	0.00%			E
Schramm Inc.						1.00	0.00%	0.00%			E
Specialty Glass Products						1.00	0.00%	0.00%			E
Tube Methods						1.00	0.00%	0.00%			E
Tudor Tech Inc						1.00	0.00%	0.00%			E
Welding Co.						1.00	0.00%	0.00%			E
T R W Inc.						0.45	0.00%	0.00%			E
Budd Co						0.36	0.00%	0.00%			E
Jenson, Homer						0.36	0.00%	0.00%			E
Witronics						0.30	0.00%	0.00%			E
Lightman Drum Co						0.27	0.00%	0.00%			C
Mack Electric						0.27	0.00%	0.00%			E
Chester County Intermediate Unit						0.07	0.00%	0.00%			E
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			E
De Minimis Total:	673.00	25.00%	23.48%	\$2,168,627	\$868,287	\$884.37	35.69%	33.51%	\$2,786,132	\$1,219,287	\$7,123,333
Total:	2283.71	100.00%	100.00%			2768.87	100.00%	100.00%			

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* Superceding 4/27/98 VRS

- A De maximis party and does not qualify for de minimis settlement offer
- B Party has been identified as an orphan
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary
- D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary
- E De minimis party

**Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.¹

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums² received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

³ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

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**Malvern TCI Refund Site
Broker/Transporter Volumetric Ranking Summary***

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total De Minimis Payment	Total De Minimis Payment
Continental Vanguard, Inc.						89.36	0.32%	0.33%	\$29,062	\$12,677	\$41,739	\$30,571	\$72,310
Eldredge, Inc.						549.53	1.99%	2.06%					A
F T C Hazardous						89.91	0.33%	0.34%	\$29,240	\$12,755	\$41,996	\$0	\$41,996
Inland Pumping & Dredging Corp.						67.00	0.24%	0.00%					B
J & J Spill						115.54	0.42%	0.43%	\$37,576	\$16,391	\$53,967	\$20,085	\$74,052
Keystone-Block Transportation						723.27	2.62%	2.71%					A
Lightman Drum Co.						48.00	0.17%	0.18%	\$15,611	\$6,610	\$22,420	\$126	\$22,546
North Industrial Chemicals						24.00	0.09%	0.09%	\$7,805	\$3,405	\$11,210	\$28,025	\$39,235
P Q Corporation						67.00	0.24%	0.25%	\$21,790	\$9,505	\$31,295	\$0	\$31,295
Philadelphia Steel Drum Co. Inc.						43.00	0.16%	0.16%	\$13,984	\$6,100	\$20,085	\$0	\$20,085
Phillips & Jacob	20.00	0.88%	0.89%	\$82,865	\$36,479	20.00	0.07%	0.07%	\$6,504	\$2,837	\$128,686	\$25,804	\$154,490
Ponderosa Disposal Co.						111.00	0.40%	0.00%					B
Quaker City Chemicals	52.00	2.28%	2.33%			333.11	1.21%	1.25%					A
R & E Martin, Inc.						55.00	0.20%	0.21%	\$17,887	\$7,803	\$25,690	\$54,317	\$80,007
Resource Technology Services, Inc.						206.27	0.75%	0.77%					A
Waste Conversion						38.00	0.14%	0.14%	\$12,358	\$5,391	\$17,749	\$97,154	\$114,903
Waste Consulting & Brokerage						5.38	0.02%	0.02%	\$1,743	\$760	\$2,504	\$0	\$2,504
U.S. Environmental Services						4.00	0.01%	0.01%	\$1,301	\$567	\$1,868	\$0	\$1,868
Total:	72.00	3.16%	3.22%	\$82,865	\$36,479	2689.36	9.38%	9.62%	\$194,861	\$86,001	\$399,114	\$266,082	\$665,291

* Superseding 4/27/98 VRS

A Party does not qualify for *de minimis* settlement offer

B Party has been identified as an orphan.

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Appendix D

Malvern TCE Superfund Site
Explanation Sheet for the Second Round *De Minimis* Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) New Volumetric Ranking Summary (VRS) for the Second Round *De Minimis* Settlement. This New VRS for the Second Round *De Minimis* Settlement supplants the VRS dated 11/30/98 only in reference to the parties eligible for this Second Round *De Minimis* Settlement.¹

PRP Name = The name of the specific potentially responsible party (PRP)

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975.

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemelene prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemelene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$10,544,199.49, the total past costs³ and estimated future cost associated with the FDA

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 *de minimis* settlement).

MPA Drums = The total number of drums sent by each PRP, regardless of the date.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemelene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan² drums received by Chemelene Corporation, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$9,961,900.49, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 *de minimis* settlement).

Total Payment = The sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there was either a viable generator or a viable broker/transporter as of November 30, 1998.

³ The total past cost for the Site as of October 3, 2000 is \$4,776,948.97. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

**Malvern TCE Superfund Site
Second Round De Minimis Settlement
Volumetric Ranking Summary
(Alphabetical by PRP)**

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$3,247	\$1,530	\$4,778
Boekel Industries						13.00	0.05%	0.05%	\$4,691	\$2,210	\$6,901
Elco Corporation	61.00	2.67%	2.73%	\$287,692	\$133,514	61.00	0.22%	0.23%	\$22,010	\$10,372	\$453,589
Ervins Crafts						5.00	0.02%	0.02%	\$1,804	\$850	\$2,654
K- D Tool Manufacturing						95.00	0.34%	0.36%	\$34,278	\$16,153	\$50,432
Maida Development						57.5	0.21%	0.22%	\$20,747	\$9,777	\$30,524
McHugh Railroad Maint. Equip. Co.						4.00	0.01%	0.01%	\$1,443	\$680	\$2,123
Photofabrication Chemical & Equipment						7.19	0.03%	0.03%	\$2,594	\$1,223	\$3,817
R & E Martin						171.29	0.62%	0.64%	\$61,805	\$29,125	\$90,931
Technitrol	10	0.44%	0.45%	\$47,163	\$18,240	10	0.04%	0.04%	\$3,608	\$1,417	\$70,428
Total	71					432.98					\$716,177

**Malvern TCE Superfund Site
Second De Minimis Settlement
Volumetric Ranking Summary
(Descending)**

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
Elco Corporation	61.00	2.67%	2.73%	\$287,692	\$133,514	61.00	0.22%	0.23%	\$22,010	\$10,372	\$453,589
R & E Martin						171.29	0.62%	0.64%	\$61,805	\$29,125	\$90,931
Technitrol	10.00	0.44%	0.45%	\$47,163	\$18,240	10.00	0.04%	0.04%	\$3,608	\$1,417	\$70,428
K-D Tool Manufacturing Co						95.00	0.34%	0.36%	\$34,278	\$16,153	\$50,432
Maida Development						57.5	0.21%	0.22%	\$20,747	\$9,777	\$30,524
Boekel Industries						13.00	0.05%	0.05%	\$4,691	\$2,210	\$6,901
American Electronics Laboratories						9.00	0.03%	0.03%	\$3,247	\$1,530	\$4,778
Photofabrication Chemical & Equipment						7.19	0.03%	0.03%	\$2,594	\$1,223	\$3,817
Ervin's Crafts						5.00	0.02%	0.02%	\$1,804	\$850	\$2,654
McHugh Railroad Maint. Equip. Co.						4.00	0.01%	0.01%	\$1,443	\$680	\$2,123
Total	71					432.98					\$716,177

Attachment C

17301-3

Malvern TCE Volumetric Ranking Summaries/Overview and Methodology

This document provides a general overview and describes methodology utilized by EPA in the preparation of the Malvern TCE Superfund Site ("Site") Volumetric Ranking Summaries dated November 30, 1998 ("Summaries"). A description of *de minimis* settlement eligibility and requirements also is provided.

I. VOLUMETRIC RANKING SUMMARIES: OVERVIEW

The volumetric ranking summaries reflect revisions made by EPA to draft Site volumetric ranking summaries prepared by EPA and distributed to potentially responsible parties ("PRPs") for the Site on November 3, 1997 and April 30, 1998. Among other things, the attached Summaries incorporate information obtained by EPA as a result of: a) EPA's review and/or reconsideration of challenges submitted by PRPs to EPA to prior draft Site volumetric ranking summaries; b) review by EPA of Site records; and c) EPA research into the continued existence and viability of various PRPs identified in connection with the Site.

A. Generator and Transporter Volumetric Ranking Summaries

EPA has prepared two volumetric ranking summaries for the Site: a Generator Volumetric Ranking Summary ("Generator VRS") and a Broker/Transporter Volumetric Ranking Summary ("Broker/Transporter VRS"). As a result of EPA's review of Site records documenting transactions between PRPs and Chemclene, a number of brokers/transporters have been identified. The Summaries are intended to reflect all generator and broker/transporter PRP transactions at the Site and to attribute to each generator and broker/transporter identified at the Site, the full volume of waste into the Site contributed by each, as reflected in Site records. All documented shipments of waste to the Site are reflected in the Generator VRS; transactions involving brokers/transporters also are reflected in the Broker/Transporter VRS. See Section II.D. of this Overview and Methodology for additional details relating to generator and broker/transporter transactions.

B. Information contained in Summaries

In general, the attached Summaries provide the following for each PRP:

1. The volume of waste each PRP contributed to the Site.

This volume reflects, for each PRP, the total volume of waste, as measured in 55-gallon drum units, each PRP contributed to the Former Disposal Area ("FDA") and the Main Plant Area ("MPA") of the Site, areas used by Chemclene as part of its operations. These amounts are reflected in the "FDA Drums" and the "MPA Drums" columns of the Summaries. See Section II.B.3. of this Overview and Methodology for details regarding EPA's methodology

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relating to the FDA and MPA.

2. The percentage of waste each PRP contributed to the FDA and MPA.

This percentage reflects each PRP's percentage of waste contributed to the FDA and MPA, relative to the percentage of total waste sent by all PRPs to the FDA and MPA, respectively. These percentages are reflected in the "FDA %" and "MPA %" columns of the Summaries.

3. The revised percentage of waste each PRP contributed to the FDA and MPA.

EPA has determined that some Site PRPs are no longer financially viable corporate entities, and, therefore, are Site "orphans" that will not participate in any *de minimis* settlement with EPA. These orphan shares have been apportioned on a *pro rata* basis among non-orphan Site PRPs. This apportionment is reflected in the "Revised FDA %" and "Revised MPA %" columns of the Summaries.

4. De minimis settlement payment required of each settling de minimis PRP.

The Summaries include each eligible *de minimis* PRP's share of costs such PRP will be required to pay in order to participate in a *de minimis* settlement with EPA. The total payment required of each *de minimis* PRP is reflected in the "Total Payment" column of the Summaries. The total payment required of each PRP includes each PRP's share of costs associated with the FDA and MPA, as set forth in the "FDA Cost" and "MPA Cost" columns of the Summaries. In addition, the total payment required of each PRP includes a premium payment assessed by EPA to take into account remedy and cost risks assumed by EPA in connection with the Site and the *de minimis* settlement. The premium is not assessed on EPA's past costs, but only on the estimated future costs. Premiums are reflected in the "FDA Premium" and "MPA Premium" columns of the Summaries.

See the Explanation Sheets attached to the Summaries for additional details regarding the information contained in the Summaries.

II. METHODOLOGY UTILIZED BY EPA WHEN CREATING THE VOLUMETRIC RANKING SUMMARIES

A. Documents Used

The Summaries prepared for the Site were compiled using Site documents obtained by EPA from Chemclene. These documents, which include invoices, receipts, purchase orders, manifests, and a number of other related documents, refer to transactions dating from 1968 until 1992 between Chemclene and its customers. These documents memorialize a number of

different types of transactions, reflecting the varied nature of Chemclene's business and Chemclene's changing billing practices. Examples of the transactions reflected in the documents include, but are not limited to:

1. Shipment of solvent and non-solvent waste from waste generators to Chemclene for processing and/or disposal;
2. Transshipments of solvent and non-solvent waste from Chemclene to other treatment, storage and disposal facilities;
3. Transfer of reclaimed solvents from Chemclene back to the original waste generator;
4. Transfer of raw or reclaimed solvent from Chemclene to customers;
5. Return of unused solvents or unused empty drums from customers to Chemclene;
6. Transfer of empty drums from Chemclene to waste generators to be filled up with wastes;
7. Purchases of raw materials by Chemclene;
8. Sale of services (such as waste sampling or transport services) by Chemclene to customers; and
9. Charges by Chemclene for off-Site disposal of still-bottoms resulting from the on-Site processing of wastes.

B. Interpretation of Documents

1. Waste into the Site

Based upon its understanding of Chemclene's operations, EPA has assumed that any unit of waste shipped to the Site was just as likely to have become a contaminant in the environment as any other unit of waste.

In preparing the volumetric ranking, EPA has examined carefully the Site documents to determine which transactions indicate the shipment of waste to Chemclene, and to determine the volume of these shipments.

The majority of transactions reflected in the Summaries are documented by a Chemclene invoice. In many instances, however, there are other documents that reveal the

details of the transaction more clearly than the invoice. For most transactions, the nature of the transaction is clear regardless of which document is examined. However, in some cases the nature of the transaction becomes clear only by comparing two or more documents. In all instances, EPA looked at all of the documents related to a transaction before determining how to interpret the documents.

2. Time Period Summarized

For purposes of preparing the VRS, EPA reviewed and summarized existing Site documents, which refer to the 1968 to 1992 time period. EPA is aware that Chemclene operations at the Site commenced in approximately 1952. However, since EPA does not have information relating to the 1952 to 1968 period of Chemclene operations, EPA has made no assumptions regarding waste transactions during that time period, and has not attempted to summarize waste transactions during that time period. Available information indicates that Chemclene withdrew its Part B Application submitted pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 *et seq.*, to operate as a treatment and storage facility, and stopped accepting waste solvent for reclamation in July 1992.

3. Main Plant Area and Former Disposal Area

Information available to EPA indicates that Chemclene utilized both the MPA and FDA as part of Chemclene's operations. At all times during its operation, until approximately July 1992, Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including hazardous substances. All wastes sent to the Site initially went to the MPA. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations. Chemclene also disposed of wastes, including hazardous substances, at the FDA. Chemclene claims that disposal at the FDA ceased when new management took over the business in approximately August 1975, at which point Chemclene discontinued use of the FDA and disposed of waste generated from the reclamation process off-Site.

Based upon the foregoing information, when preparing the volumetric ranking summaries for the Site, EPA counted all waste transactions between Chemclene and PRPs during the 1968 to August 1975 time period as waste into both the MPA and the FDA. EPA has counted waste transactions between Chemclene and PRPs after August 1, 1975, only as waste into the MPA.

The distinction between the MPA and the FDA is meaningful in two ways: a) in the setting of the cut-off delineating which PRPs may be eligible to participate in a *de minimis* settlement; and b) in determining the amount of monies eligible *de minimis* PRPs will be required to pay in order to participate in a *de minimis* settlement with EPA.

Each PRP's eligibility for *de minimis* status will be determined using the percentage of the total waste sent to the Site by the PRP. This percentage is set forth in the

"MPA %" column of the Summaries, since all waste into the Site was received and processed by Chemclene at the MPA.

The Site remedy selected by EPA in its Record of Decision dated November 26, 1997, has provided for distinct remedies for the MPA and FDA. Even though significant aspects of the cleanup of the MPA and the FDA may be combined, EPA believes that costs of the remedy can be allocated fairly between the two areas. EPA separately has calculated the *de minimis* settlement payments of each eligible *de minimis* PRPs for the MPA and FDA and has added these amounts to obtain a "Total Payment" required.

4. Transshipments

Based upon EPA's understanding of Chemclene's operations and review of Site records, EPA has determined that some waste received by Chemclene at the Site likely was transhipped off-Site, e.g. shipped off-Site for processing and/or disposal. Information available to EPA indicates that Chemclene often would containerize and store at the Site these wastes for off-Site shipment at some later date, and that releases or threatened releases of these wastes at the Site occurred as a result of Chemclene's practice.

EPA did not count as waste into the Site, transactions that appear to reflect that waste was sent off-Site for processing or disposal *only* in those instances where EPA could document, typically through its review of waste manifests, that such wastes remained in their original shipping containers and were not bulk-stored or otherwise opened and handled on-Site, prior to off-Site shipment.

C. Units of Measurement

To the extent applicable, EPA has prepared the volumetric ranking in accordance with OSWER Directive 9835.16, "Guidance to Preparing and Releasing Waste-In Lists and Volumetric Rankings to PRPs Under CERCLA," dated February 22, 1991. The most common unit of shipment was the 55-gallon drum, and therefore all other units found in the documentation were converted to 55-gallon drum units. When units were listed in gallons or other units of volume, simple mathematics was used to convert into drum units. For those entries with less than 55 gallons, a decimal was used. For example, if the documents indicated ten 30-gallon containers of waste shipped to Chemclene, then the 300 gallons of waste would be divided into 55-gallon units yielding 5.45 drums.

In a comparatively few instances, shipments of waste were listed in units of weight or other units. In these instances EPA used the following assumptions:

- For those entries listing pounds as the measurement unit, EPA's standard conversion factor of 1 gallon = 8.33 pounds was extrapolated to 55 gallons = 458 pounds.

- 1 can = 5 gallons.
- 1 bottle = 1 gallon.
- 1 lab pack = 1 gallon.

In addition, a small number of transactions indicated the shipment to Chemclene of "empty" drums or other containers which are listed as "used" or "dirty" or some other language indicating that the container had at one time contained waste. In these instances EPA assumed that the container contained 3% of its capacity in hazardous wastes, based upon the definition of "empty" in the RCRA regulations. See 40 C.F.R. § 261.7.

D. Brokers/Transporters

As a result of its review of Site documents, EPA has identified a number of PRPs that appear to have acted as brokers and/or transporters of waste to the Site. EPA has included broker/transporter PRPs in the Summaries.

Most Site records that identify brokers/transporters refer to brokers/transporters with whom it appears Chemclene dealt directly. A number of Site records, for example, reflect that Chemclene directly billed and/or credited such brokers/transporters with regard to waste transactions at the Site.

The Site records that refer to broker/transporter PRPs identify two types of transactions: 1) transactions in which a broker/transporter appears to have arranged for the transport or disposal of or transported waste generated by a third-party to the Site, and in which both the broker/transporter and the generator are expressly identified in the corresponding Site record; and 2) transactions between a broker/transporter and Chemclene where no third-party generator has been identified. In the latter instance the documentation is the same as for any other generator, and the party listed on the documentation is thus treated as a generator for those transactions, even if the same party may have acted as a broker/transporter in other instances.

Consistent with OSWER Directive 9835.16, whenever a Site record reflects a transaction in which both a generator PRP and a broker/transporter PRP are expressly identified, EPA has attributed the waste volume referred to in each such transaction to both the generator and the broker/transporter for purposes of compiling waste-in information contained in the Summaries. However, EPA has counted the total waste referred to in these transactions only once for purposes of determining total waste contributed to the Site by all PRPs.

The Generator VRS summarizes waste volume information: 1) for each generator PRP; and 2) for each broker/transporter PRP only with regard to those broker/transporter transactions with Chemclene for which no corresponding third-party generator has been identified. As set forth above, in cases where a third-party generator is not identified, the party named on the

invoice or other documentation has been treated as a generator for that transaction even if the party involved has been identified as a broker/transporter for other transactions.

The total waste contributed to the Site by all PRPs appears at the end of the Generator VRS.

EPA has prepared a separate Broker/Transporter VRS in order to summarize those waste-in transactions in which both a broker/transporter and a generator have been identified. The waste volume reflected in these transactions also has been summarized for each corresponding generator in the Generator VRS. By preparing a separate Broker/Transporter VRS, EPA can attribute to each broker/transporter the waste reflected in these transactions, but avoid double-counting the waste when determining total waste contributed to the Site by all Site PRPs (as reflected in the Generator VRS).

Broker/transporter PRPs should refer to both the Generator VRS and the Broker/Transporter VRS in order to determine waste volume and percentage information.

For purposes of a *de minimis* settlement, both the generator and the broker/transporter will be liable for the full amount of the waste in a transaction involving both a generator and a broker/transporter. In other words, for some shipments two parties both will be fully liable for the share of the cleanup represented by those drums. However, parties can avoid full liability if the broker/transporter and the generator cooperate with each other and agree to an allocation between themselves. In such instances, the broker/transporter and the generator may *jointly* settle with EPA for the full amount of the wastes in question, and avoid having to *each* pay for the wastes.

E. Grouped PRPs

Based upon information obtained by EPA, EPA has concluded that some Site PRPs are related or successor entities to other Site PRPs. EPA has grouped related/successor entities in the attached Summaries. For each such grouping, EPA has determined the grouping's total volume and percentage liability at the Site based upon the combined totals of each related/successor entity. Total volume and percentage information for each grouping is set forth in the Generator VRS that is arranged alphabetically by PRP. Total volume and percentage information for each grouping is set forth under the name of the PRP grouping and appears in bold print. Volume and percentage information for each separate related/successor PRP member of the grouping also is set forth in the Summaries.

F. Orphan PRPs

When a PRP is unable to pay all or part of its allocated share of a cleanup, EPA may allocate such a share among the viable PRPs in the same ratio as other cleanup costs. Pursuant to EPA's "Orphan Share" policies, EPA, under certain circumstances, may pay (from the

Superfund) a portion of the shares of PRPs that are completely non-viable. Orphan share funding may be available only to PRPs that agree to implement and fund remedial actions at a site, and not to *de minimis* PRPs. *De minimis* PRPs may be asked to pay on a *pro rata* basis for any shares for which the orphan PRPs are unable to pay. In addition, the *de minimis* premium will take into consideration the likelihood that additional such shares will be identified subsequent to the conclusion of the *de minimis* settlement.

When EPA has been able to identify a PRP as an orphan in the attached summaries, EPA has included for each such PRP, total volume and percentage information. EPA does not anticipate that Site orphans will participate in the *de minimis* settlement or otherwise pay monies towards Site remediation. Therefore, EPA has not included payment information for any Orphan. In addition, EPA has revised each non-Orphan PRP percentage ("Revised FDA %" and "Revised MPA %"), reflecting each non-orphan PRPs *pro rata* payment share for each Site orphan.

The calculation of the revised percentages has been done on a transaction by transaction basis. If a transaction involves an orphan generator, then the transaction was checked to determine if there was a broker/transporter for the same transaction. A transaction has been divided on a *pro rata* basis among the remaining PRPs only if there is *neither* a viable generator *nor* a viable broker/transporter for the transaction.

III. *DE MINIMIS* SETTLEMENT

A. *De Minimis* Cutoff

EPA has established a cut-off for *de minimis* settlement eligibility using a percentage of the total waste sent to the Site by the PRP. A PRP is eligible to participate in a *de minimis* settlement if its volumetric contribution of hazardous substances to the Site is at or less than 0.75% of the total volume attributed to the MPA. Pre-August 1975 percentages that have been assigned for the FDA have not been considered by EPA when establishing the *de minimis* settlement eligibility cutoff. However, such percentages have been considered by EPA when determining the amount of money each *de minimis* PRP will be asked to pay if it desires to settle.

EPA has also established a *de micromis* cutoff at 1.5 drums or less. EPA does not foresee a need for settlements with *de micromis* parties. EPA will, however, pursue settlements with *de micromis* parties if there is a threat of, or an actual suit by, other PRPs at the Site.

B. *De Minimis* Payments

The attached Summaries contain *de minimis* settlement payment information for each eligible *de minimis* settlement. EPA has divided the costs of the selected remedy, as set forth in the ROD, between the MPA and FDA, and has determined each *de minimis* PRP's required settlement payments for each of these areas of the Site. A PRP's required *de minimis* payment is

determined based upon its revised percentages for the FDA and the MPA. These revised percentages are then applied to the total costs estimates for the MPA and the FDA.

As of June 17, 1997, EPA incurred approximately \$2,214,705.00 in response costs ("Past Response Costs") at or in connection with the Site. Since EPA incurred the Past Response Costs as a result of activities that pertained to both the FDA and MPA, EPA has attributed one-half (\$1,107,352.00) of the Past Response Costs to FDA costs and the other one-half (\$1,107,352.00) to MPA costs. EPA has estimated future Site costs associated with cleanup and EPA oversight of the Site to be approximately \$15,729,151.00 (\$15,529,151.00 in remedial costs; \$200,000.00 in EPA remedial oversight). Of that amount, approximately \$8,155,725.00 has been attributed by EPA to cleanup of the FDA (\$8,055,725.00 in remedial costs; \$100,000.00 in EPA remedial oversight). Future costs associated with cleanup and EPA oversight of the MPA are approximately \$7,573,426.00. (\$7,473,426.00 in remedial costs; \$100,000.00 in EPA remedial oversight).

EPA has assessed a premium, which each *de minimis* PRP must pay in addition to each PRP's percentage of FDA and MPA costs, in order to participate in the *de minimis* settlement with EPA. The premium is intended to take into account a number of Site factors and risks, including additional remedial action and potential response cost overruns, that EPA may encounter when settling with *de minimis* PRPs. EPA has established a premium of 50% in this matter, i.e. a multiplier of .50.

**Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.¹

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums² received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

³ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

AR000108

**Malvern TCE Refund Site
Generator Volume Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
A. Duie Pyle						1.00	0.00%	0.00%			D
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Ace Service Corp.						1.00	0.00%	0.00%			D
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Albright Paper & Box Corp.						1.11	0.00%	0.00%			D
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Amp Corp	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000109

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Amunee Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Antenna Corp.						1.00	0.00%	0.00%			D
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Aydn						251.82	0.91%	0.94%			A
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Beckett Corporation						250.55	0.91%	0.94%			A
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bandtru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Blagram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Boebel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Boyerstown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Brittany's Ltd						2.00	0.01%	0.00%	\$0	\$0	B
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000110

Malvern TCF Refund Site
 Generator Volume Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Budd Co.						0.36	0.00%	0.00%			D
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Burroughs Corp.	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cabot Grouping						481.88	1.46%	1.60%			A
Cabot Berylco						143.00	0.52%	0.54%			A
Cabot Wrought Products						27.00	0.10%	0.10%			A
Cabot Company						13.00	0.05%	0.05%			A
Kawecki Berylco						218.00	0.79%	0.82%			A
Camdel Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Cantol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Carvel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Chester County Intermediate Unit						0.07	0.00%	0.00%			D
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
Cincinnati Time						1.00	0.00%	0.00%			D
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party

AR000111

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.40	0.12%	0.00%	\$0	\$0	B
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Defense Reutilization & Marketing Grouping						348.98	1.27%	1.31%			A
Madison, IN						13.00	0.05%	0.05%			A
DRMS/PNSY						200.72	0.73%	0.75%			A
DRMO PHILADELPHIA						54.00	0.20%	0.20%			A
Picatinny Arsenal						8.26	0.03%	0.03%			A
DRMO Knox						74.00	0.27%	0.28%			A
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Delbar Products						328.50	1.19%	1.23%			A
Delco Wire & Cable, Inc / Delco Elec						47.00	0.17%	0.00%	\$0	\$0	B
Delmaco Mfg Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Dentronix, Inc						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

AR000112

**Malvern TCE Superfund Site
Generator Volume Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Detra Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
DeVibiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Devon Apparel						1.00	0.00%	0.00%			D
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Durawood						1.00	0.00%	0.00%			D
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E I T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
E/M Corporation						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Eaton	36.00	1.56%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
Electro Tech Systems Inc.						1.00	0.00%	0.00%			D
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Elisco						8.36	0.03%	0.03%	\$2,718	\$1,186	\$3,903
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
Erwins Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ext -Corporal						4.00	0.01%	0.00%	\$0	\$0	B

* Superceding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000113

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fairchild Space Systems						1.00	0.00%	0.00%			D
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Fergusson						5.96	0.02%	0.02%	\$1,938	\$845	\$2,783
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
G K Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Gas Springs						23.00	0.08%	0.08%	\$7,477	\$3,262	\$10,739
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volur anking Summary.

D De minimis party

AR000114

Malvern TCE Refund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
H I Services Inc.						1.00	0.00%	0.00%			D
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Hamilton Watch Co.	197.00	8.63%	8.61%			904.00	3.27%	3.39%			A
Handy & Harman Tube Co. Inc						229.18	0.83%	0.86%			A
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Hollingsworth						7.00	0.03%	0.03%	\$2,278	\$993	\$3,268
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Hough/Loew Associates						1.09	0.00%	0.00%			D
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Imperial Specialty						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$36,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
J & J Spill						43.00	0.16%	0.16%			C
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695
Jenson, Homer						0.36	0.00%	0.00%			D
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000115

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Alphabetical Listing)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Kim Manufacturing						283.00	1.03%	1.06%			A
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
Laminators Inc						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
Lightman Drum Co.						0.27	0.00%	0.00%			C
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Lovelkin Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
M Q S Inspection Inc /Magnaflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
Mack Electric						0.27	0.00%	0.00%			D
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
Manorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

AR000116

Malvern TCE Refund Site
Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Mars Money Systems						1.00	0.00%	0.00%			D
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
McHugh Railroad Maint Equip Co						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Met Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Morning Call						355.00	1.29%	1.33%			A
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
National Computer Systems						1.00	0.00%	0.00%			D
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
National Products						1.00	0.00%	0.00%			D
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669

* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

AR000117

Malvern TCE Superfund Site
 Generator Volumetric Ranking Summary*
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
North Industrial Chemicals						60.00	0.22%	0.22%			C
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Pennwalt Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Perkin-Elmer						1.00	0.00%	0.00%			D
Permut/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Phico Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C

AR000118

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Photolastic Inc.	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
Pitman Corp.						47.00	0.17%	0.18%	\$15,200	\$6,665	\$21,945
Plate Crafters Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plymouth Tube	9.00	0.39%	0.40%			568.37	2.05%	2.12%			A
Pocono Foundry Inc.						1.00	0.00%	0.00%			D
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Porter Instruments						228.27	0.83%	0.85%			A
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
R & E Martin, Inc.						116.29	0.42%	0.44%			C
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
R C Kietzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Reilly Plating						430.00	1.56%	1.61%			A
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Richard Hursi						4.08	0.01%	0.00%	\$0	\$0	B
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
S K F Industries Inc.						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

AR000119

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Schmidt Brewery Co.						1.00	0.00%	0.00%			D
Schramm Inc.						1.00	0.00%	0.00%			D
Scotco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Sikkens Co.						16.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Silvne						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Glass Products						1.00	0.00%	0.00%			D
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party

AR000120

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Alphabetical Listing)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Sunlamp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Syntex/Star Grouping						728.00	2.83%	2.72%			A
Syntex Dental Products						115.00	0.42%	0.43%			A
Star Dental Corporation						610.00	2.21%	2.28%			A
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
T R W Inc.						0.45	0.00%	0.00%			D
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
Tele Dynamics						8.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			D
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Tube Methods						1.00	0.00%	0.00%			D

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De minimis party.

AR000121

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Alphabetical Listing)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Tudor Tech Inc.						1 00	0.00%	0.00%			D
U S A Ardec						11 00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
U S Electronic Services Corp	19 00	0.83%	0.00%	\$0	\$0	19 00	0.07%	0.00%	\$0	\$0	B
United Chem-Con Corp.						21 00	0.08%	0.00%	\$0	\$0	B
United Contamination Controls Inc.						4 00	0.01%	0.01%	\$1,300	\$567	\$1,868
USG Grouping						686.40	2.12%	2.20%			A
U S G Interiors						182 00	0.66%	0.68%			A
Floor Systems Inc						71 40	0.26%	0.27%			A
Donn Corporation						292 00	1.06%	1.09%			A
Davey Products						41 00	0.15%	0.15%			A
Valley Forge Laboratories, Inc						7 00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Tape & Label Co						122 36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Victualic Company of America						9 00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Vishay Resistive Systems						241 00	0.87%	0.90%			A
Viz Manufacturing	104 00	4.55%	4.65%			819 84	2.97%	3.07%			A
Waste Conversion						104 00	0.38%	0.39%			C
Wave Energy Systems						3 00	0.01%	0.00%	\$0	\$0	B
Welding Co.						1 00	0.00%	0.00%			D
Wetex Inc.						61 00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
Westcode Inc.						28 22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Western Electric	139 00	6.09%	6.22%			2083 00	7.54%	7.80%			A
Westinghouse						23 00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Wilkinson Industries						3 00	0.01%	0.00%	\$0	\$0	B
Wiltronics						0 30	0.00%	0.00%			D
Woodstream Corp						5 00	0.02%	0.02%	\$1,625	\$709	\$2,335
Xynatech Inc.						39 00	0.14%	0.15%	\$12,679	\$5,531	\$18,210

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

AR000122

**Malvern TCE Fund Site
Generator Volumetric Ranking Summary***
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
De Minimis Total:	873.00	25.09%	23.48%	\$2,158,627	\$960,267	9864.37	36.69%	33.61%	\$2,796,132	\$1,219,287	\$7,123,333
Total:	2283.71	100.00%	100.00%			27608.87	100.00%	100.00%			

AR000123

* Superceding 4/27/98 VRS

- A De maximus party and does not qualify for de minimis settlement offer
- B Party has been identified as an orphan.
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary
- D De minimis party

**Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS).
Example provided below for an illustration of the process used to calculate individual total payment.¹

	Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
AUK	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan¹ drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost¹ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums¹ received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost¹ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

¹ Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

¹ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

AR100124

Malvern TCI Refund Site
Broker/Transporter Volumetric Ranking Summary*

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total De Minimis Payment	Total De Minimis Payment
Continental Vanguard, Inc.						89.36	0.32%	0.33%	\$29,062	\$12,677	\$41,739	\$30,571	\$72,310
Eldredge, Inc.						549.53	1.99%	2.06%					A
F T C Hazardous						89.91	0.33%	0.34%	\$29,240	\$12,755	\$41,996	\$0	\$41,996
Inland Pumping & Dredging Corp.						67.00	0.24%	0.00%					B
J & J Spill						115.54	0.42%	0.43%	\$37,576	\$16,391	\$53,967	\$20,085	\$74,052
Keystone-Block Transportation						723.27	2.62%	2.71%					A
Lightman Drum Co.						48.00	0.17%	0.18%	\$15,611	\$6,610	\$22,420	\$126	\$22,546
North Industrial Chemicals						24.00	0.09%	0.09%	\$7,805	\$3,405	\$11,210	\$28,025	\$39,235
P Q Corporation						67.00	0.24%	0.25%	\$21,790	\$9,505	\$31,295	\$0	\$31,295
Philadelphia Steel Drum Co. Inc.						43.00	0.16%	0.16%	\$13,984	\$6,100	\$20,085	\$0	\$20,085
Phillips & Jacob	20.00	0.88%	0.89%	\$82,865	\$36,479	20.00	0.07%	0.07%	\$6,504	\$2,837	\$128,686	\$25,804	\$154,490
Ponderosa Disposal Co.						111.00	0.40%	0.00%					B
Quaker City Chemicals	52.00	2.26%	2.33%			333.11	1.21%	1.25%					A
R & E Martin, Inc.						55.00	0.20%	0.21%	\$17,887	\$7,803	\$25,690	\$54,317	\$80,007
Resource Technology Services, Inc.						206.27	0.75%	0.77%					A
Waste Conversion						38.00	0.14%	0.14%	\$12,368	\$5,391	\$17,749	\$97,154	\$114,903
Waste Consulting & Brokerage						5.38	0.02%	0.02%	\$1,743	\$760	\$2,504	\$0	\$2,504
U.S. Environmental Services						4.00	0.01%	0.01%	\$1,301	\$567	\$1,868	\$0	\$1,868
Total:	72.00	3.16%	3.22%	\$82,865	\$36,479	2589.36	0.30%	0.62%	\$194,861	\$86,661	\$398,774	\$266,982	\$666,291

* Superseding 4/27/98 VRS

A Party does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

AR000125

**Malvern TCE Superfund Site
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.¹

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies, therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost³ and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums² received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost³ and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

² Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

³ The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

AR000091

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Hamilton Watch Co.	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Syntex/Star Grouping											
Star Dental Corporation						610.00	2.21%	2.28%			D, A
Plymouth Tube	9.00	0.39%	0.40%			566.37	2.05%	2.12%			A
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Burroughs Corp.	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Reilly Plating						430.00	1.56%	1.61%			A
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Morning Call						355.00	1.29%	1.33%			A
Delbar Products						328.50	1.19%	1.23%			A
USG Grouping											
Donn Corporation						292.00	1.06%	1.09%			D, A

AR000092

* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If a company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

Malvern TCE Refund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Kim Manufacturing						283.00	1.03%	1.06%			A
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Aydn						251.82	0.91%	0.94%			A
Beckett Corporation						250.55	0.91%	0.94%			A
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Handy & Harman Tube Co. Inc						229.18	0.83%	0.86%			A
Porter Instruments						228.27	0.83%	0.85%			A
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
Cabot Grouping											
Kawecki Beryco						218.00	0.79%	0.82%			D, A
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918
Defense Reutilization & Marketing Grouping											
DRMS/PNSY						200.72	0.73%	0.75%			D, A
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912

* Superseding 4/27/98 VRS

- A De maximis party and does not qualify for de minimis settlement offer.
- B Party has been identified as an orphan.
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.
- D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.
- E De micromis party.

AR000093

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
USG Grouping											
U S G Interiors						182.00	0.66%	0.68%			D, A
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
Cabot Grouping											
Cabot Berylo						143.00	0.52%	0.54%			D, A
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
S K F Industries Inc.						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
R & E Martin, Inc.						118.29	0.42%	0.44%			C
Syntex/Star Grouping											
Syntex Dental Products						115.00	0.42%	0.43%			D, A
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695

AR000094

* Superceding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E De minimis party.

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Waste Conversion						104.00	0.38%	0.39%			C
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping											
DRMO Knox						74.00	0.27%	0.28%			D, A
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809
USG Grouping											
Floor Systems Inc.						71.40	0.26%	0.27%			D, A

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E De minimis party.

AR000095

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
Scotco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Welex Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
North Industrial Chemicals						60.00	0.22%	0.22%			C
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Sotalaro						57.00	0.21%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping											
DRMO PHILADELPHIA						54.00	0.20%	0.20%			D, A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Delco Wire & Cable, Inc. / Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B

AR000096

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D Company appears under a grouping, please refer to the combined entities through Alphabetical Volumetric Ranking Summary

E De minimis party.

**Malvern TCE Groundwater Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
M Q S Inspection Inc./Magnaflex						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
J & J Spill						43.00	0.16%	0.16%			C, A
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
USG Grouping											
Devey Products						41.00	0.15%	0.15%			D, A
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Carvel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Manographics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De minimis party

AR000097

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Cabot Grouping											
Cabot Wrought Products						27.00	0.10%	0.10%			D, A
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E De minimis party

AR000098

Malvern TCE erfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Accumetrix						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Amuneal Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Beamer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Carmel Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Cantol Inc						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
U S Electronic Services Corp	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Sikkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

* Superceding 4/27/98 VRS

- A De maximus party and does not qualify for de minimis settlement offer.
- B Party has been identified as an orphan.
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.
- D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.
- E De micromis party.

AR000099

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cobra Wire & Cable Co						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Pennwalt Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plate Crafters Inc						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Boebel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070

AR000100

* Superceding 4/27/98 VRS

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B Party has been identified as an orphan

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D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E L Party

Malvern TCE erfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Cabot Grouping											
Cabot Company						13.00	0.05%	0.05%			D, A
Defense Reutilization & Marketing Grouping											
Madison, IN						13.00	0.05%	0.05%			D, A
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Crown Marketing Equipment Co						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Techaloy Inc						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Photolastic Inc.	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Delta Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B

* Superceding 4/27/98 VRS

- A De maximus party and does not qualify for de minimis settlement offer.
- B Party has been identified as an orphan
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary
- D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary
- E De micromis party

AR000101

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Prodelt Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Vicluatic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Ellisco						8.36	0.03%	0.03%	\$2,718	\$1,186	\$3,903
Defense Reutilization & Marketing Grouping											
Picatunny Arsenal						8.26	0.03%	0.03%			D, A
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
Bigram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E De minimis party.

AR000102

**Malvern TCE Refund Site
Generator Volumetric Ranking Summary***
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Kraulramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Met Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lovkun Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Tele Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fergusson						5.98	0.02%	0.02%	\$1,938	\$845	\$2,783
Boyetown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ervins Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De micromis party.

AR000103

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
Airtine Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Ext - Corporal						4.00	0.01%	0.00%	\$0	\$0	B
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868

AR000104

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary

E De minimis party.

Malvern TCE erfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Permut/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Precision Arts Mig.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
R C Kletzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De micromis party

AR000105

**Malvern TCE Superfund Site
Generator Volumetric Ranking Summary*
(By Descending Order)**

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Petler Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Delmaco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Pepco Manufacturing Co						2.00	0.01%	0.01%	\$650	\$284	\$934
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Albright Paper & Box Corp.						1.11	0.00%	0.00%			E
Hough/Loew Associates						1.09	0.00%	0.00%			E
A. Due Pyle						1.00	0.00%	0.00%			E
Ace Service Corp.						1.00	0.00%	0.00%			E
Antenna Corp.						1.00	0.00%	0.00%			E
Cincinnati Time						1.00	0.00%	0.00%			E
Devon Apparel						1.00	0.00%	0.00%			E
Durawood						1.00	0.00%	0.00%			E
Electro Tech Systems Inc.						1.00	0.00%	0.00%			E
Fairchild Space Systems						1.00	0.00%	0.00%			E
H I Services Inc.						1.00	0.00%	0.00%			E

* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer.

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If company appears under a grouping, please refer to the combined entities throughout Alphabetical Volumetric Ranking Summary.

E L orms party

AR000106

Malvern TCE erfund Site
Generator Volumetric Ranking Summary*
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Money Systems						1.00	0.00%	0.00%			E
National Computer Systems						1.00	0.00%	0.00%			E
National Products						1.00	0.00%	0.00%			E
Perkin-Elmer						1.00	0.00%	0.00%			E
Pocono Foundry Inc.						1.00	0.00%	0.00%			E
Schmidt Brewery Co.						1.00	0.00%	0.00%			E
Schramm Inc.						1.00	0.00%	0.00%			E
Specialty Glass Products						1.00	0.00%	0.00%			E
Tube Methods						1.00	0.00%	0.00%			E
Tudor Tech Inc.						1.00	0.00%	0.00%			E
Welding Co.						1.00	0.00%	0.00%			E
T R W Inc.						0.45	0.00%	0.00%			E
Budd Co.						0.36	0.00%	0.00%			E
Jenson, Homer						0.36	0.00%	0.00%			E
Watronics						0.30	0.00%	0.00%			E
Lightman Drum Co.						0.27	0.00%	0.00%			C
Mack Electric						0.27	0.00%	0.00%			E
Chester County Intermediate Unit						0.07	0.00%	0.00%			E
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			E
De Minimis Total:	673.00	25.05%	23.48%	\$2,168,627	\$960,287	964.37	36.69%	33.61%	\$2,795,132	\$1,219,287	\$7,123,333
Total:	2283.71	100.00%	100.00%			2768.87	100.00%	100.00%			

AR000107

* Superseding 4/27/98 VRS

- A De maximus party and does not qualify for de minimis settlement offer.
- B Party has been identified as an orphan
- C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary
- D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary
- E De micromis party

Attachment D

Malvern TCE Superfund Site
Explanation Sheet for the Second Round *De Minimis* Settlement - Volumetric Ranking Summaries

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) New Volumetric Ranking Summary (VRS) for the Second Round *De Minimis* Settlement. This New VRS for the Second Round *De Minimis* Settlement supplants the VRS dated 11/30/98 only in reference to the parties eligible for this Second Round *De Minimis* Settlement.¹

PRP Name = The name of the specific potentially responsible party (PRP).

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemelene prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan² drums received by Chemelene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$10,544,199.49, the total past costs³ and estimated future cost associated with the FDA

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 *de minimis* settlement)

MPA Drums = The total number of drums sent by each PRP, regardless of the date

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemelene Corporation, multiplied by 100

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan² drums received by Chemelene Corporation, multiplied by 100

MPA Cost = MPA Revised % divided by 100 and multiplied by \$9,961,900.49, the total past cost³ and estimated future cost associated with the MPA

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 *de minimis* settlement)

Total Payment = The sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium

¹ The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment

² Non-orphan drums are drums for which there was either a viable generator or a viable broker/transporter as of November 30, 1998.

³ The total past cost for the Site as of October 3, 2000 is \$4,776,948.97. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA

**Malvern TCE Superfund Site
Second Round De Minimis Settlement
Volumetric Ranking Summary
(Alphabetical by PRP)**

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$3,247	\$1,530	\$4,778
Boekel Industries						13.00	0.05%	0.05%	\$4,691	\$2,210	\$6,901
Elco Corporation	61.00	2.67%	2.73%	\$287,692	\$133,514	61.00	0.22%	0.23%	\$22,010	\$10,372	\$453,589
Ervin's Crafts						5.00	0.02%	0.02%	\$1,804	\$850	\$2,654
K- D Tool Manufacturing						95.00	0.34%	0.36%	\$34,278	\$16,153	\$50,432
Maida Development						57.5	0.21%	0.22%	\$20,747	\$9,777	\$30,524
McHugh Railroad Maint. Equip. Co.						4.00	0.01%	0.01%	\$1,443	\$680	\$2,123
Photofabrication Chemical & Equipment						7.19	0.03%	0.03%	\$2,594	\$1,223	\$3,817
R & E Martin						171.29	0.62%	0.64%	\$61,805	\$29,125	\$90,931
Technitrol	10	0.44%	0.45%	\$47,163	\$18,240	10	0.04%	0.04%	\$3,608	\$1,417	\$70,428
Total	71					432.98					\$716,177

**Malvern TCE Superfund Site
Second De Minimis Settlement
Volumetric Ranking Summary
(Descending)**

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
Elco Corporation	61.00	2.67%	2.73%	\$287,692	\$133,514	61.00	0.22%	0.23%	\$22,010	\$10,372	\$453,589
R & E Martin						171.29	0.62%	0.64%	\$61,805	\$29,125	\$90,931
Technitrol	10.00	0.44%	0.45%	\$47,163	\$18,240	10.00	0.04%	0.04%	\$3,608	\$1,417	\$70,428
K-D Tool Manufacturing Co						95.00	0.34%	0.36%	\$34,278	\$16,153	\$50,432
Maida Development						57.5	0.21%	0.22%	\$20,747	\$9,777	\$30,524
Boekel Industries						13.00	0.05%	0.05%	\$4,691	\$2,210	\$6,901
American Electronics Laboratories						9.00	0.03%	0.03%	\$3,247	\$1,530	\$4,778
Photofabrication Chemical & Equipment						7.19	0.03%	0.03%	\$2,594	\$1,223	\$3,817
Erwins Crafts						5.00	0.02%	0.02%	\$1,804	\$850	\$2,654
McHugh Railroad Maint. Equip. Co.						4.00	0.01%	0.01%	\$1,443	\$680	\$2,123
Total	71					432.98					\$716,177

Attachment E

Malvern TCE Comprehensive Mailing List

Comprehensive Mailing List (Alphabetical Order)

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5/9/2001

A & J Screw Machine Products
Mr. Joseph A. Harmer, CEO
24 Hillside Avenue
Chalfont, PA 18914-2804

A & J Screw Machine Products
Mr. Joseph A. Harmer
32 Hamilton Street
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Chalfont, PA 18914-2804

A & L Handles
c/o Drinker, Biddle & Reath, LLP
Andrew P. Foster, Esq.
Philadelphia National Bank Building
1345 Chestnut Street
Philadelphia, PA 19107-3496

A & L Handles
Mr. Philip K. Stonier, Vice President
244 Shoemaker Road
Pottstown, PA 19464

** A I W Frank

A. Duie Pyle
Mr. Peter Latta, President
650 Westown Road
West Chester, PA 19382

A. Johnson & Company Incorporated
Titanium Hearth Technologies, Inc.
President
215 Welsh Pool Road
Lionville, PA 19353

A. Johnson & Company Incorporated
Titanium Hearth Technologies, Inc.
900 Herlock Road
Morgantown Business Park
Morgantown, PA 19543

A.S. Koch Corporation
c/o Syntex Dental Corporation
c/o Heller, Ehrman, White, & McAuliffe
Charles M. Hungerford, Esq.
525 University Avenue
Palo Alto, CA 94301-1900

A.S. Koch Corporation
c/o Syntex Dental Corporation
c/o Langsam, Stevens, & Morris
Mark Stevens, Esq.
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Suite 812
Philadelphia, PA 19103

A.S. Koch Corporation
c/o Syntex Dental Corporation
President
P.O. Box 896
Valley Forge, PA 19134

Accumetrics
Mr. Paul Pitcher, President
134 Adams Street
Royersford, PA 19468

Accuracy Scientific
c/o Accuracy Scientific Instruments
Mr. Frank Kleine, President
17 Piney Road
Asheville, NC 29906

Accuracy Scientific
c/o Accuracy Scientific Instruments
Mr. Frank Kleine, President
17 Piney Road
Asheville, NC 29906

* Address investigation currently being conducted.

** Party has been identified as an orphan.

Malvern TCE Comprehensive Mailing List

PAGE 2 OF 43

Comprehensive Mailing List (Alphabetical Order)

5/9/2001

Accuracy Scientific
c/o Quinlan et al
Mr. Ferdinand Weiss, CEO
2335 Church Road and Rt 38
Cherry Hill, NJ 08002

Ace Service Corporation
President
1924 South Delaware Avenue
Philadelphia, PA 19148

Acro Labels
Mr. Bob Reagan, President
2531 Wyandotte Road
Willow Grove, PA 19090

Acro Labels
c/o Obermayer, Rebmann, Maxwell, & Hippel
Daniel F. Schranghamer, Esq.
One Penn Center-19th Floor
1617 John F. Kennedy Boulevard
Philadelphia, PA 19103-1895

Action Manufacturing Company
c/o Ballard, Spahr, Andrew, & Ingersoll
Henry Weiss, Esq.
1735 Market Street - 51st Floor
Philadelphia, PA 19103

Action Manufacturing Company
Mr. Arthur Mattia, President
100 East Erie Avenue
Philadelphia, PA 19134

** ADEC

Adelphia Graphic Systems (AGS)
c/o Elliot Reihner Siedzikowski & Egan, P.C
Doug Blazey, Esq.
Union Meeting Corporate Center IV
925 Harvest Drive
P. O. Box 3010
Blue Bell, PA 19422

Adelphia Graphic Systems (AGS)
Ms. Paula Inforzato, Vice President
302 Commerce Drive
Exton, PA 19341

** Aero Plating

** Agitar, Div. of Air Buensod Incorporated

Airline Hydraulics Corporation
Mr. Joseph Laughran, President
3557 Progress Drive
Bensalem, PA 19020

Airworks
c/o Shanley & Fisher
Richard A. Levao, Esq.
131 Madison Avenue
Morristown, NJ 07962-1979

Airworks
c/o UNC Airworks
Ted Coyle, Esq.
101 East Orden Boulevard
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** Party has been identified as an orphan.

Malvern TCE Comprehensive Mailing List

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Comprehensive Mailing List (Alphabetical Order)

5-9-2001

Airworks
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Mr. Hugh E. McElroy, Vice President
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Albright Paper & Box Corporation
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Alfa-Laval Separation Incorporated
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Alfa-Laval Separation Incorporated
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c/o Henkel Corporation
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American Electronics Laboratories
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** Ames Supply

Ametek Incorporated
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* Address investigation currently being conducted.

** Party has been identified as an orphan.

Malvern TCE Comprehensive Mailing List

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Comprehensive Mailing List (Alphabetical Order)

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Anchor Darling Company
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Angelo
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Armstrong Cork Company
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Mr. George Lorch, President
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Asplundh Manufacturing Company
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Malvern TCE Comprehensive Mailing List

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Comprehensive Mailing List (Alphabetical Order)

5-9-2001

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Athena Controls
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* Auto Pack

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Malvern TCE Comprehensive Mailing List

Comprehensive Mailing List (Alphabetical Order)

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Bendtru Company
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Bishop Tube Company
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** Bo Peep Cleaners

* Address investigation currently being conducted.

** Party has been identified as an orphan.

Malvern TCE Comprehensive Mailing List

Comprehensive Mailing List (Alphabetical Order)

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Malvern TCE Comprehensive Mailing List

Comprehensive Mailing List (Alphabetical Order)

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* Address investigation currently being conducted.

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Malvern TCE Comprehensive Mailing List

Comprehensive Mailing List (Alphabetical Order)

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Malvern TCE Comprehensive Mailing List

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5/9/2001

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Malvern TCE Comprehensive Mailing List

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5/9/2001

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Malvern TCE Comprehensive Mailing List

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Comprehensive Mailing List (Alphabetical Order)

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Malvern TCE Comprehensive Mailing List

Comprehensive Mailing List (Alphabetical Order)

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Malvern TCE Comprehensive Mailing List
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Malvern TCE Comprehensive Mailing List

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Malvern TCE Comprehensive Mailing List

Comprehensive Mailing List (Alphabetical Order)

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* Address investigation currently being conducted.

** Party has been identified as an orphan.

Malvern TCE Comprehensive Mailing List

Comprehensive Mailing List (Alphabetical Order)

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Malvern TCE Comprehensive Mailing List

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Malvern TCE Comprehensive Mailing List

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Comprehensive Mailing List (Alphabetical Order)

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* Address investigation currently being conducted.

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Malvern TCE Comprehensive Mailing List

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Comprehensive Mailing List (Alphabetical Order)

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Malvern TCE Comprehensive Mailing List
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Malvern TCE Comprehensive Mailing List

Comprehensive Mailing List (Alphabetical Order)

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Malvern TCE Comprehensive Mailing List

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Malvern TCE Comprehensive Mailing List

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Comprehensive Mailing List (Alphabetical Order)

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Malvern TCE Comprehensive Mailing List

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5-9-2001

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Malvern TCE Comprehensive Mailing List

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Malvern TCE Comprehensive Mailing List

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Malvern TCE Comprehensive Mailing List

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* Address investigation currently being conducted.

** Party has been identified as an orphan.

Malvern TCE Comprehensive Mailing List

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* Address investigation currently being conducted.

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Malvern TCE Comprehensive Mailing List

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* Address investigation currently being conducted.

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5/9/2001

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Comprehensive Mailing List (Alphabetical Order)

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Malvern TCE Comprehensive Mailing List
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Malvern TCE Comprehensive Mailing List

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Woodstream Corporation
c/o Ecko Group, Inc.
Ms. Linda R. Millman, Asst. General Counsel
98 Split Brook Rd.
Suite 102
Nashua, NH 03062

Yuasa-Exide Battery Corporation
Mr. Om P. Chopra, Director, Environmental
Resources
2400 Bennville Road
Reading, PA 19605

Zenith Products Corporation
c/o Masco Corporation
Mr. Scott Halpert, Esq.
21001 Van Borne
Taylor, MI 48180

Westinghouse
Mr. Roger E. Willis, Jr., Esq.
11 Stanwix Street
Pittsburgh, PA 15222

** Wilkinson Industries

Woodstream Corporation
Mr. Harry Whaley, President
69 N. Locust Street
Lititz, PA 17543-0327

Xyantech Incorporated
Mr. James T Redd, President
545 Vortex Road, Northeast
Rio Rancho, NM 87124

Zenith Products Corporation
Mr. Kim Day, President
200 Commerce Drive
Aston, PA 19014

* Address investigation currently being conducted.

** Party has been identified as an orphan.

Attachment F

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: American Electronics Laboratories

[REDACTED]						
4/26/80	923		NA	WASTE TRICHLORETHYLENE	9.00	Yes
4/26/80	923		NA	TRICHLORETHYLENE & WATER	13.00	No
Total Waste Counted Towards Ranking					9.00	

CHEMCLENE CORPORATION

BOX 26, R. D. #1
MALVERN, PENNSYLVANIA 19355
215 - 644-2986

INVOICE NO.

7885

Sold to:

Resource Tech. Svcs.
Devon, Penna.

Date of Invoice:

Feb. 25, 1980

Your Order Number:

Shipper #157934

Terms:

A.E.L. Job.
Net, 30 days

Delivery Ticket No.:

2306

PERCHLORETHYLENE _____ lb. net @ _____

TRICHOLORETHYLENE _____ lb. net @ _____

METHYLENE CHLORIDE _____ lb. net @ _____

1-1-1 TRICHLOROETHANE _____ lb. net @ _____

PAID

CHECK No. 1729

DATE 7 MAR 80

22 waste lbs Picked up & removed 1 load waste to Ambler;

Truck & Driver 7 hours @ \$11.50/hr.

95 miles @ \$0.18/mile

19 gal. gas @ \$1.10/gal.

= \$ 94.50

= \$ 17.10

= \$ 20.90

\$132.50

1.39

18.93

CHEMCLENE CORP.

MALVERN, PA. 19355

PHONE (215)

644-2986

2306

Resource Date FEB 25 19 80
 Sold to RESEARCH TECHNOLOGY SERVICE
 Address BEVON, PA.

A.C.E. 100 - SHOPS NO. 137934

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER METER RECEIPT

TEMPERATURE _____ WEIGHT _____

YOUR SALE NO. _____ GALLON READING - FINISH _____ TONS _____

*22 Waste Tri picked up.
 REMOVED 1 LBR WASTE TO AMISLAC*

PREVIOUS SALE NO. _____ GALLON READING - START _____

GALLONS DELIVERED

PRODUCT	POUNDS	PRICE	TOTAL AMT.
PERCHLORETHYLENE	<i>TRUCK DRIVER 7420</i>	<i>17.50</i>	<i>94.50</i>
TRICHLOROETHYLENE	<i>95 POUNDS</i>	<i>0.18</i>	<i>17.10</i>
METHYLENE CHLORIDE	<i>19 GALLONS</i>	<i>1.10</i>	<i>20.90</i>
			<i>132.50</i>

X. J. O'Neil
 CUSTOMER SIGN HERE AFTER DELIVERY

215-644-2988

CHEMCLENE CORPORATION

BOX 26, R. D. #1
MALVERN, PENNSYLVANIA 19355

Purchased From:

Resource Tech. Svcs., Inc.
Devon, Penna.

Date: April 26, 1980

Your Shipping Number: 2/25/80

Our Receiving Number: 0923

A.E.L.

QUANTITY RECEIVED DRUMS/LBS. NET	MATERIAL	QUANTITY RECOVERED LBS. NET	PRICE	TOTAL
9/4,644 lbs.	Trichlorethylene	2,662 lbs.	\$0.03/lb.	\$79.89
4 drums heel produced	+ 13 drums water to be returned.		Check #10276 enclosed.	

RECEIVING RECORD

0923

RESOURCE TECHNOLOGY SERVICES, INC

RECEIVED FROM RTS AF1 (AFEL DUB)
ADDRESS

PACKAGE ORDER NO. OR RETURNED GOODS	FREIGHT BILL NO.	DATE 2/25/80
VIA YT GJD	PREPAID	COLLECT

1	22	Drums	Waste Tri
2			
3			Ran 9 Tri
4			
5			Produced 250 gals Tri
6			Three drums heel.
7			
8			The other 13 are to be
9			returned to RTS
10			TRI - REC = 4,694 (9 DRS)
11			REC'D = 2,662
12			@0.03 = \$79. ⁰⁰

REMARKS: CONDITIONS, ETC.
 4 DRS HAZEL PRODUCED
 + 13 DRS. WATER TO BE RETURNED
 CIG # 10276 ENCLOSURE

NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY	DELIVERED TO
--------------	--------	-------------	------------	--------------

Rediform ©
2H 259

BE SURE TO MAKE THIS RECORD ACCURATE AND COMPLETE

RECEIVING RECORD

0923

RECEIVED FROM RTS AEL			
ADDRESS			
PURCHASE ORDER NO. OR RETURNED GOODS		FREIGHT BILL NO.	DATE 2/25/80
VIA YT GJD		PREPAID	COLLECT
1	22	Drums	Waste Tri
2			
3			10 MORE H ₂ O + TCE -
4			THEY GO BACK TO RTS
5			
6			
7			
8			
9			
10			
11			
12			
REMARKS: CONDITIONS, ETC.			
NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY
			DELIVERED TO

Rediform ©
2H 259

**BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE**

March 21, 1980

Mr. Bill Minnick
Resource Technology Services
6 Berkeley Rd.
Devon, PA 19333

Dear Mr. Minnick,

This is to confirm our conversation regarding the Trichlorethylene from American Electronics Laboratories, Inc.

The 9 drums (72-1-1) of spent Trichlorethylene are acceptable for reclamation. The 2 drums (72-1-8), while they were not used, they off color resulting from rust in the drums and will have to be reclaimed to bring them back to specification. In this way, they too are acceptable.

Per our agreement, after reclamation, the residue will be returned to you for proper disposal.

Sincerely,



King Graver

CHEMCLENE CORPORATION

BOX 26, R. D. #1
MALVERN, PENNSYLVANIA 19355
215 - 644-2986

INVOICE NO.

7985

Date of Invoice: **May 16, 1980**

Your Order Number:

Terms: **Net, 30 days**

Delivery Ticket No.: **2399**

Sold to:

**Research Tech. Svcs.
Devon, Penna.**

PERCHLORETHYLENE _____ lb. net @ _____

TRICHLORETHYLENE _____ lb. net @ _____

METHYLENE CHLORIDE _____ lb. net @ _____

1-1-1 TRICHLOROETHANE _____ lb. net @ _____

16 drums HHR AKL:

Truck & Driver for 6 1/2 hours @ \$24.00/hr. = \$156.00

PAID

CHECK No. 1371

DATE 15 JUL 80


CHEMCLENE CORP.
 MALVERN, PA. 19355
 PHONE (215) 644-2986

Sold to **RESEARCH TECHNOLOGY SERVICE**
 Address **DEVON, PA.**

Date **MAY 16 19 80**

2399

TO INSURE YOU
 OF ACCURACY



AUTOMATICALLY PRINTED

MASTEK MATRI RECEIPT

TEMPERATURE	
WEIGHT	GALLON READING - FINISH
TRUCK & DRIVER 16 DRUMS AEL 6 1/2 HOURS 19 MILES	
YOUR SALE NO.	GALLON READING - START
GALLONS DELIVERED	
PREVIOUS SALE NO.	TOTAL AMT.
PRODUCT	PRICE
PERCHLORETHYLENE	156.00
TRICHLOROETHYLENE	24.00
METHYLENE CHLORIDE	

CUSTOMER SIGN HERE AFTER DELIVERY **X**

$$\left. \begin{array}{l} 29 \text{ miles} \\ 8:30 - 3:05 \\ 5:25 \text{ hr} \end{array} \right\} \text{distance} = 120 \frac{93}{80}$$

CHEMCLENE CORPORATION

BOX 26, R. D. #1
MALVERN, PENNSYLVANIA 19355
215 - 644-2986

INVOICE NO.
8157

Sold to: **Resource Technology Services, Inc.**
Devon, PA

Date of Invoice: **19 September 1980**
Your Order Number: **Verbal, Jim**
Terms: **Net 30 days**

Job: A.E.L. (#72-5-80)

Delivery Ticket No.: **2548**

_____	PERCHLORETHYLENE _____	lb. net @ _____
_____	TRICHOLORETHYLENE _____	lb. net @ _____
_____	METHYLENE CHLORIDE _____	lb. net @ _____
_____	1-1-1 TRICHLOROETHANE _____	lb. net @ _____

Stake truck and driver for 2½ hours @ \$24.00/hour.....\$ 60.00

P A I D

CHECK No. 1660
DATE 25 Nov 80

George Schiele

STRAIGHT BILL OF LADING
ORIGINAL—NOT NEGOTIABLE

Shipper No. PO 111178

Carrier No. 72-5-80

RESOURCE TECH SERVICES

(Name of Carrier)

(BAC)

Date 9/20/80

TO: Consignee Resource Tech Service
On Collect on Delivery shipments, the letters "COD" must appear before consignee's name, or as otherwise provided in Reg 430, Sec. 1.
Street
Destination DEVON PA Zip Code

FROM: Shipper American Electronic LMS
STUMP RD
Street
MONTGOMERYVILLE PA
Origin

Route Vehicle Number

No. of Units & Container Type	HM	DESCRIPTION AND CLASSIFICATION (Proper Shipping Name and Class per 49 CFR 172.101)	TOTAL QUANTITY (Weight, Volume, Gallons, etc.)	WEIGHT (Subject to Correction)	RATE	CHARGES (For Carrier Use Only)
9 DRUMS	X	MIXED SOLVENTS VARIOUS LIQUIDS WASON B (72-5-134)				
PLACARDS TENDERED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>						

REMIT C.O.D. TO: ADDRESS

COD Amt: \$

C.O.D. FEE: PREPAID COLLECT \$

Note—Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.
The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ per _____

This is to certify that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.
George Schiele Signature

Subject to Section 7 of the conditions, if this shipment is to be delivered to the consignee without recourse on the consignee, the consignee shall sign the following statement:
The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
George Schiele (Signature of Consignee)

TOTAL CHARGES: \$
FREIGHT CHARGES
FREIGHT PREPAID except when box is checked
Check box if charges are to be collect

RECEIVED, subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packages unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or

any of, said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.
Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

SHIPPER George Schiele
PER

CARRIER RTS
PER Wm Wynnical
DATE 9/20/80

Permanent post-office address of shipper

STYLE F-50-3 • LABELMASTER • CHICAGO, IL • 60626 312/973-5100

1

UNITED STATES BILL OF LADING
ORIGINAL—NOT NEGOTIABLE

Shipper No. 8011178
Carrier No. 725-80
Date 9/20/80

RESOURCE TECH SERVICES
(Name of Carrier) (SCAC)

TO: Consignee <u>RESOURCE TECH SERVICES</u> <small>On Collect on Delivery shipments, the letters "COD" must appear before consignee's name & or as otherwise provided in Item 43B, Sec. 1.</small>	FROM: Shipper <u>AEL</u>
Street	Street <u>MONTGOMERY PA</u>
Destination <u>DECON PA</u> Zip Code	Origin

No. of Units & Container Type	HM	DESCRIPTION AND CLASSIFICATION <small>(Proper Shipping Name and Class per 49 CFR 172.101)</small>	QUANTITY <small>(Units, Pallets, Cases, etc.)</small>	WEIGHT <small>(Subject to Correction)</small>	RATE	CHARGES <small>(For Carrier Use Only)</small>
9 DRUMS	X	72-5-B1 CUTTING OIL COMBUSTIBLE LIQ				
1 "	X	72-5-B2 CHROMIUM ACID SOLUTION CORROSIVE MATERIAL				
1 "	X	72-5-B3 CADMIUM CHLORIDE CORROSIVE MATL				
1 "	X	72-5-B4 AROCLOR, FORM, TEE POISON B				
1 "	X	72-5-B5 PHOTO DEVELOPER CORROSIVE MATL				
1 "	X	72-5-B6 PURE OIL COMBUSTIBLE LIQ				
2 "	X	72-5-B7 SPENT SOLVENTS FLAMMABLE LIQ				
1 "	X	72-5-B8 HY TAMP OIL COMBUSTIBLE LIQ				
1 "	X	72-5-B9 PAINT THINNER FLAMMABLE LIQ				
2 "	X	72-5-B10 PAINT SLUDGE HAZ WASTE NOS CRM-E				
1 "	X	72-5-B11 LAB MATL				
		2.5 gal / ORGANIC PHOSPHATE PESTICIDES				
		POISON B				
PLACARDS TENDERED: YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>						

REMIT C.O.D. TO: ADDRESS <small>Note—Where the rate is dependent on value shippers are required to state specifically in writing the agreed or declared value of the property. The agreed or declared value of the property is hereby specifically stated by the shipper to be not exceeding \$ _____ per _____</small>	COD Amt: \$ _____ <small>Subject to Section 7 of the conditions, if the shipment is to be delivered to the consignee without recourse or the consignor, the consignor shall sign the following statement: The carrier will not make delivery of this shipment without payment of freight and all other lawful charges.</small>	C.O.D. FEE: PREPAID <input type="checkbox"/> COLLECT <input type="checkbox"/> \$ _____ TOTAL CHARGES: \$ _____ FREIGHT CHARGES <small>FREIGHT PREPAID (except when box of freight is prepaid) <input type="checkbox"/></small>
<small>This party certifies that the above-named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.</small> Signature: <u>[Signature]</u>		Signature of Consignor: _____

RECEIVED, subject to the classification and tariffs in effect on the date of the issue of this Bill of Lading, the property described above in apparent good order, except as noted (contents and condition of contents of packaged unknown), marked, consigned, and destined as indicated above which said carrier (the word carrier being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination on its route, otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to destination and as to each party at any time interested in all or any said property, that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

PER <u>[Signature]</u>	CARRIER <u>RESOURCE TECH SERVICES</u> PER <u>U. K. [Signature]</u> DATE <u>9/20/80</u>
------------------------	--

CHEMCLENE CORP.

MALVERN, PA. 19355

PHONE (215)
644-2986

2548

Date SEPT 19 19 88

Sold to RESOURCE TECH, SERVICE
Address DEVON, PA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER RECEIPT

TEMPERATURE _____ WEIGHT _____

YOUR SALE NO. _____ GALLON READING - FINISH _____ 10ms _____

*Y.T. AND DRIVER
AEC SUB 72-5-80*

PREVIOUS SALE NO. _____ GALLON READING - START _____

GALLONS DELIVERED

PRODUCT	POUNDS	PRICE	TOTAL AMT.
PERCHLORETHYLENE	<i>5.10 x 10.00</i>	<i>11.25</i>	<i>60.00</i>
TRICHLOROETHYLENE	<i>6.00</i>		
METHYLENE CHLORIDE			

X *Wm. J. W. [Signature]*
CUSTOMER SIGN HERE AFTER DELIVERY

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Boekel Industries

Transaction Date	Quantity	Lot Number	Material ID	Material Description	Weight (lbs)	Counted
2/6/84	860	11873	PAA 4769026	WASTE 1,1,1 TRICHLOROETHANE	3.00	Yes
11/26/84	1165	12552	PAB 00889733	WASTE MINERAL SPIRITS	3.00	Yes
11/26/84	1166	12552	PAB 00889733	WASTE TRICHLORETHYLENE	3.00	Yes
5/7/85	956	12096	PAA 4769833	WASTE PETROLEUM NAPHTHA	1.00	Yes
1/10/86	1583	13410	PAB 00893384	WASTE TRICHLORETHYLENE	3.00	Yes
Total Waste Counted Towards Ranking					13.00	

INVOICE

CHEMCLINE CORPORATION
(Solvents, Equipment & Waste Disposal)

238 N. PHOENIXVILLE PA • MALVERN, PA 19358
(610) 644-8888

No. 11873

Boekel Industrial Inc.
509 Vine St.
Phila., Pa. 19106

SHIPPED TO

Same

INVOICE DATE	DATE SHIPPED	DUS ORDER NO.	YOUR ORDER NO.	TERMS	F.O.B.	SALESPERSON	SHIPPED VIA
2-6-84	2-6-84	860	2704	net 30 days			OT
3 Drs.	Waste 1,1,1-trichloroethane removed for processing and disposal Material under manifest # PAA 4769026					\$65.00 Ex. Dr.	\$195.00

PAID

CHECK No. 154751
DATE 4-12-84

FOUR HERE

MANIFEST

P.O. # 2704

CHEMCLENE CORPORATION

860

MALVERN, PA.

PAA 4769026

(215) 644-2986

DATE Feb 6, 1984

GENERATOR Boekel Ind Inc. CODE _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Trichloroethylene</u>	<u>3 drums</u>	

CHEMCLENE EMPLOYEE George Dippell

AUTHORIZED SIGNATURE FOR GENERATOR [Signature]

3 DRUMS WASTE 1,1,1-TRICHLOROETHYLENE RE-MOVED FOR PROCESSING DISCUSS @ 65 100

\$ 195.⁰⁰

DISPOSAL TREATMENT FACILITY Chemcylene Corp

DATE RECEIVED 2-6-84

FACILITY EMPLOYEE AID

WHITE - OFFICE

PINK - INVOICE

YELLOW - GENERATOR

GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

CONTINUOUS IMPROVED... INC. O... 312110132710

MEMO	INVOICE DATE	INVOICE NUMBER	AMOUNT	DISCOUNT	NET AMOUNT
M Chemclene Corporation P/J done	2/6/84	CC11873	\$195.00		

DETACH BEFORE DEPOSITING

BOEKEL INDUSTRIES, INC.

BOEKEL INDUSTRIES INC.

609 VINE STREET, PHILADELPHIA, PA 19106
 (215) 627-1611

PURCHASE ORDER
 SHOW ORDER NUMBER ON
 ALL INVOICES, PACKAGES
 AND SHIPPING DOCUMENTS.

ORDER NO. 2704

JOB NO. disposal of waste

DATE 2/8/84

TERMS net 30 days

SHIPPING ESTIMATE 2/6/84

Chemclene Corporation
 258 North Phoenixville Pike
 Malvern, PA 19355

SHIP TO
 BOEKEL INDUSTRIES INC.
 509 VINE STREET
 PHILADELPHIA, PA 19106

VIA pickup via your truck
 F.O.B.

ITEM	QUANTITY	PART NO.	DESCRIPTION	UNIT PRICE	TOTAL
1	3	drums	waste trichlorethylene to be removed	\$65.00	\$195.00
CONFIRMING WITH JEFF LUPO					

SHIPPING NOTICES - Send copies to destination and address below.

PACKING SLIP - List contents and include copy in shipments sent LCL, Parcel Post, Express or Truck.

INVOICES & BILL OF LADING } Issue invoices and packing lists in DUPLICATE with original bill of lading to

BOEKEL INDUSTRIES INC.
 509 VINE STREET
 PHILADELPHIA, PA 19106

IMPORTANT! This offer consists of the terms on the front and reverse sides hereof AND Buyer expressly limits acceptance to the terms hereof and no different or additional terms proposed by Seller shall become part of the contract.

Address
 Correspondence To: BOEKEL INDUSTRIES INC.

Deborah Hauser

ACKNOWLEDGEMENT MUST BE SIGNED AND RETURNED WITHIN 10

BOEKEL INDUSTRIES INC.

509 VINE STREET, PHILADELPHIA, PA 19106
(215) 627-1811

PURCHASE ORDER
SHOW ORDER NUMBER ON
ALL INVOICES, PACKAGES
AND SHIPPING DOCUMENTS.

ORDER NO. **2704**

JOB NO. **disposal of waste**

DATE **2/8/84**

TERMS **net 30 days**

SHIPPING ESTIMATE **2/6/84**

Chemclene Corporation
258 North Phoenixville Pike
Malvern, PA 19355

SHIP TO
BOEKEL INDUSTRIES INC.
509 VINE STREET
PHILADELPHIA, PA 19106

VIA **pickup via your truck**
F.O.B.

ITEM	QUANTITY	PART NO.	DESCRIPTION	UNIT PRICE	TOTAL
1	3	drums	waste trichlorethylene to be removed	\$65.00	\$195.00

ACKNOWLEDGEMENT

CONFIRMING WITH JEFF BUPO

SHIPPING NOTICES - Send copies to destination and address below.

PACKING SLIP - List contents and include copy in shipments sent LCL, Parcel Post, Express or Truck.

INVOICES & BILL OF LADING Issue invoices and packing lists in **DUPLICATE** with original bill of lading to:

BOEKEL INDUSTRIES INC.
509 VINE STREET
PHILADELPHIA, PA 19106

IMPORTANT! This offer consists of the terms on the front and reverse sides hereof AND Buyer expressly limits acceptance to the terms hereof and no different or additional terms proposed by Seller shall become part of the contract.

Address
Correspondence To: **BOEKEL INDUSTRIES INC.**

ACKNOWLEDGEMENT MUST BE SIGNED AND RETURNED WITHIN 7 DAYS - Signed _____

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PENNSYLVANIA 19355

May 9, 1985

Deborah J. Glaeser
Boekel Industries, Inc.
509 Vine Street
Philadelphia, PA. 19106

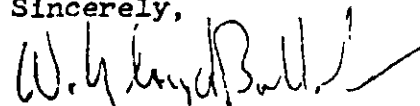
Dear Ms. Glaeser,

We have analysed your waste grinding fluid and find it to fall in the category of a waste water soluble oil. We can transport and dispose of this material (disposal will be solidification and landfilling in Oregon, Ohio) for a cost of \$160.00 per drum.

If you would like us to handle this waste stream for you, please let me know so that I may send you a material characterization form to fill out. Once the paperwork is completed we can pick up the waste within two days.

I look forward to hearing from you.

Sincerely,



W. Lloyd Balderston

WLB/cm



Boekel Industries, Inc.
509 Vine Street
Philadelphia, Pa. 19106
(215) 627-1611

May 2, 1985

Chemclene Corporation
258 N. Phoenixville Pike
Malvern, PA 19355
Attention: Lloyd

Dear Lloyd:

As per our telephone conversation of May 1, I am sending to you a sample of the mixture that we drain from our grinders. This is Cincinnati Milacron Cimcool five star 40 mixed with water and ferrous grindings.

Please analyze and quote a price on the disposal of 6-8 55 gallon drums. I am sending some literature on the Cimcool five star 40 to help you.

Regards,

Deborah J. Glaeser
Buyer

hts

INVOICE

CHEMCLENE CORPORATION

(Solvents, Equipment & Waste Disposal)
258 N. CINCINNATI PIKE • MALVERN, PA 19368
(215) 844-2388

No. 12096

SHIPPED TO

Soekel Ind, Inc.
509 Vine Street
Phila., Pa. 19106

Same

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	F.O.B.	SALESPERSON	SHIPPED VIA
5/7/84	5/7/85	956	verbal	net 30 days			OT
1 Drum	Waste Petroleum Naptha removed for disposal					\$65.00	\$65.00
	Material under manifest # PAA 4769833					Ea. Dr.	
PAID CHECK No. <u>15967</u> DATE <u>7-12-84</u>							

FORM NO. 64144, RAPIDFORMS, INC., BELLMAWR, N.J. 08015

THANK YOU

MANIFEST

VERBAL

CHEMCLENE CORPORATION

956

MALVERN, PA.

(215) 644-2988

PA 4769833

DATE May 7, 1984

GENERATOR Baekel Ind Inc CODE _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Petroleum Naphtha</u>	<u>1 drum</u>	

CHEMCLENE EMPLOYEE J. Dignall

AUTHORIZED SIGNATURE FOR GENERATOR Sharon DeGeorge

1 D.P. WASTE PETROLEUM NAPHTHA RECEIVED

FOR DISPOSAL @ 65122

DISPOSAL TREATMENT FACILITY Chemcylene Corp

DATE RECEIVED 5-7-84

FACILITY EMPLOYEE GJD

WHITE - OFFICE

YELLOW - GENERATOR

PINK - INVOICE

GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

MEMO	INVOICE DATE	INVOICE NUMBER	AMOUNT	DISCOUNT	NET AMOUNT
M Chemlene Corporation P/J done	5/7/84	CC12096	\$65.00		

DETACH BEFORE DEPOSITING

BOEKEL INDUSTRIES, INC.

INVOICE

CHEMCLENE CORPORATION

Process Equipment & Waste Control
258 N. Philadelphia Pike, Galvren, Pa. 19368
215-645-0585

No. 12552

SHIPPED TO

Boeket Ind. Inc.
609 Vine St.
Phila., Pa. 19106

Same

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	F.O.B.	SALESPERSON	SHIPPED VIA
11/26/34	11/26/34	1165,66	verbal	net 30 day			OT
3 Drs.	Removed for proces sing and/or disposal						
	Waste Mineral Spiri ts					\$65.00 Ea. Dr.	\$195.00
3 Drs.	Waste XXXXXX Tric hloroethylene					\$65.00 Ea. Dr.	\$195.00
	Material under manifest # PAB 00889733						\$390.00
PAID CHECK No. <u>19519</u> DATE <u>2/14/15</u>							

FORM NO. 64144, RAPIDFORMS, INC., BELLMAWR, N.J. 08037

THANK YOU

MANIFEST

CHEMCLENE CORPORATION

MALVERN, PA.

(215) 644-2986

VFERDAL

1165

PA 00889733

DATE Nov 26 1984

GENERATOR Brekel Ind Inc CODE _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Mineral Spirits</u>	<u>3 drums</u>	
_____	_____	_____
_____	_____	_____
_____	_____	_____

CHEMCLENE EMPLOYEE M. Duggill

AUTHORIZED SIGNATURE FOR GENERATOR Dave Miller

DISPOSAL TREATMENT FACILITY Chemcylene Corp

DATE RECEIVED 11-26-84

FACILITY EMPLOYEE GTD

WHITE - OFFICE
YELLOW - GENERATOR

PINK - INVOICE
GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

CHEMCLENE CORPORATION

MREVERN, PA

(215) 644-2886

PA68007737

DATE Nov 26 1984

GENERATOR Boekel Ind Inc CODE _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Trichloroethylene</u>	<u>3 drums</u>	

CHEMCLENE EMPLOYEE G. D. [Signature]
AUTHORIZED SIGNATURE FOR GENERATOR Dave Miller

DISPOSAL TREATMENT FACILITY [Signature]

DATE RECEIVED _____

PAID TO BY _____

PAID TO FOR _____

PAID TO BY _____

PAID TO FOR _____

PAID TO BY _____

PAID TO FOR _____

ONE INVOICE:

REMOVED FOR PROCESSING AND/OR
DISPOSAL:

3 DRG WASTE MINERAL SPILLS
@ 65/DR 195.⁰⁰

3 DRG WASTE TRICHLOROETHYLENE
@ 65/DR 195.⁰⁰

390.⁰⁰

MEMO	INVOICE DATE	INVOICE NUMBER	AMOUNT	DISCOUNT	NET AMOUNT
M Chemlene, Corp. P/J done	11/26/84	CHEM552	\$390.00		

DETACH BEFORE DEPOSITING

BOEKEL INDUSTRIES, INC.

CHEMCLINE CORPORATION
 (Solvents, Equipment & Waste Disposal)
 200 N. PHOENIXVILLE PIKE • MALVERN, PA 19368
 (215) 844-2988

No. **13410**

SHIPPED TO

General Ind. Inc.
 3000 Pine Street
 Philadelphia, PA. 19106

Same

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	F.O.B.	SALESPERSON	SHIPPED VIA
1/11/76	1/11/76	1583	5327	net 30			OT
3 Dss.	Removed for processing and/or disposal:						
	Waste Tetrahydroethylene					\$80.00	\$240.00
This material was shipped under hazardous waste manifest # PAB 00893334.							
P A I D							
CHECK No. <u>21647</u>							
DATE <u>3/17/86</u>							

FORM NO. 84144 RAPIDFORMS, INC. BELLMADE, PA 19007

THANK YOU

MANIFEST

CHEMCLENE CORPORATION

4593

MALVERN, PA.

(215) 844-2300

PO #6327

PA 30089-2384

DATE Jan 10, 1986

GENERATOR Boe Kel Ind. Inc. CODE _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Trichloroethylene</u>	<u>3 drums</u>	

CHEMCLENE EMPLOYEE A. Dwyer

AUTHORIZED SIGNATURE FOR GENERATOR A. Dwyer

3 drms @ 80/na

DISPOSAL TREATMENT FACILITY Chlorine Corp

DATE RECEIVED _____

FACILITY _____

WHITE - CHEMCLENE YELLOW - GENERATOR

DO NOT WRITE BELOW THIS LINE

MEMO	INVOICE DATE	INVOICE NUMBER	AMOUNT	DISCOUNT	NET AMOUNT
M Chemlene Corp. P/J done	1/10/86	CHEM410	\$240.00		

DETACH BEFORE DEPOSITING

BOEKEL INDUSTRIES, INC.

CIMCOOL
METALWORKING
FLUIDS

CIMCOOL
METALWORKING
FLUIDS

CIMCOOL
METALWORKING
FLUIDS

CIMCOOL
METALWORKING
FLUIDS

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FLUIDS

CIMCOOL
METALWORKING
FLUIDS

CIMCOOL
METALWORKING
FLUIDS

**SEMI-SYNTHETIC
METALWORKING FLUID FOR
MODERATE-DUTY APPLICATIONS**

CIMCOOL FIVE STAR® 40

DESCRIPTION

CIMCOOL FIVE STAR 40 metalworking fluid is a clear, water-soluble, nitrite-free, semi-synthetic product having good rust control and excellent rancidity control.

CIMCOOL FIVE STAR 40B has the same characteristics as CIMCOOL FIVE STAR 40, but is formulated to minimize foaming in soft water.

APPLICATION

For general-purpose grinding and machining operations where long cutting fluid life is needed, such as in large individual machine or central system reservoirs. Recommended for moderate-duty machining and grinding of ferrous metals, and some nonferrous metals.

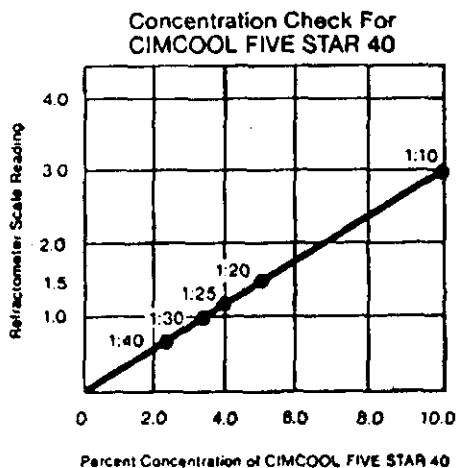
When silicones are prohibited, always use CIMCOOL FIVE STAR 40 rather than CIMCOOL FIVE STAR 40B.

**CINCINNATI
MILACRON**

FEATURES AND BENEFITS

- **EXCEPTIONAL RANCIDITY CONTROL** — no offensive odors; long fluid life minimizes concentrate usage and downtime spent in recharging a system.
- **EFFECTIVE LUBRICATION AND COOLING** — a combination of chemical lubricants and wetting agents provides good machining and grinding properties; keeps parts and tools cool; extends tool life; allows high speeds and feeds that increase production.
- **GOOD SETTLING PROPERTIES** — efficiently settles chips and grit; produces a good cake on positive filters which removes recirculating fines and also lowers media usage; parts and machines stay clean.
- **STABLE pH** — contributes to good rust and rancidity control; lessens the need for additives to maintain performance in difficult systems.
- **ORGANIC AND INORGANIC (NONNITRITE) CORROSION INHIBITORS** — protect machines and parts from rust.
- **PLEASANT TO USE** — no smoke; no slippery film on parts, machines or floors; low misting; mild to the skin when used as recommended; good foam control; no ammonia odors.
- **NO NITRITE**
- **STABLE** — easy to use; excellent for central systems.
- **CIMCOOL FIVE STAR 40 can be recycled for reuse by the CIMCOOL FULL CYCLE™ Module.**

Ask your local Cincinnati Milacron Distributor for a trial today.



CONCENTRATION

By using the American Optical Refractometer Fluid Tester, Model 10440 or the Atago Refractometer, Model SPR-N (refer to Conversion Chart at left).



CIMCOOL FIVE STAR 40

**RECOMMENDED
STARTING
DILUTIONS**

Use at 1:20 (5.0%) to 1:30 (3.3%) for machining and grinding.

CIMCOOL FIVE STAR 40 is to be mixed with water for use (add concentrate to water). Add no other substances to the concentrate or mix unless approved by Cimcool Technical Services (1-800-On 2 Time, or in Ohio 1-800-582-7522).

**RECOMMENDED
CIMCOOL
MIX MASTER
PROPORTIONER
TIP SIZES**

Dilution	1:20 (5.0%)	1:25 (4.0%)	1:30 (3.3%)	1:35 (2.9%)	1:40 (2.5%)	1:50 (2.0%)
Tip Size	52	54	56	58	60	62

After installation of the tip, titrate the mix to be sure the concentration is correct. Leaner dilutions may be needed for makeup.

For concentration analysis, use the Mixed Indicator (MI) Titration Procedure, the CIMCOOL "Mini" Kit II, or a refractometer.

**TYPICAL
PHYSICAL
AND
CHEMICAL
PROPERTIES**

Physical state liquid
 Appearance and odor clear, chemical
 Colors available pink, undyed, blue
 Solubility in water 100%
 Weight, lb/gal, 60°F (15.6°C) 8.84
 Specific gravity (H₂O = 1) 1.060
 Boiling point, °F (°C) 212 (100)
 Flash point, COC, °F (°C) none; self-extinguishing
 Fire point, COC, °F (°C) none; self-extinguishing
 Extinguishing media no fire hazard
 Unusual fire & explosion hazards none
 Freezing point (or pour point), °F, (°C) 20 (-6.7)
 If frozen, thaw completely at room temperature and stir thoroughly.
 pH, concentrate 10.3
 pH, 1:30 (3.3%) mix, typical operating conditions 9.0
 Total chlorine/chloride, wt %, calculated none/0.0033
 Total sulfur, wt %, calculated 0.012
 Phenols, phosphates, mercurials, PCB's, nitrites,
 PTBBA, diethanolnitrosamine, silicones none

PACKAGING

Available in 5-gallon pails, 55-gallon drums, Liqua Bins, and in tank truck quantities.

Do not reuse container before cleaning. After cleaning, remove label and relabel appropriately.

**DOT LABELING
REQUIREMENTS**

Hazardous Materials Description and Proper Shipping Name (49 CFR 172.101):
Not a hazardous material

Hazard Class (49 CFR 172.101):

Not applicable

*4/29
Betty
Smeorewic*

Product Safety Data

CIMCOOL FIVE STAR 40

HEALTH HAZARD DATA

Not for internal consumption.

Emergency and First Aid Procedures:

- Skin — Avoid prolonged contact with concentrate. Flush with water.
Eyes — In case of contact with concentrate, flush with running water for 15 minutes. Call a physician.
Ingestion — If concentrate is swallowed, do not induce vomiting. Dilute with water or milk. Call a physician.
Inhalation — No first aid required; concentrate not volatile.

The following toxicity tests were conducted in accordance with the techniques specified in the Regulations for the Enforcement of the Federal Hazardous Substances Act (16 CFR 1500.3, revised 1982).

- Acute Oral Toxicity (LD₅₀ - Rats) — Above 5 g/kg (undiluted).
Acute Inhalation Toxicity (LC₅₀ - Rats) — Above 20 mg/l for a 10% mix.
Acute Eye Irritation (Rabbits) — Negative (undiluted); no irritative or corrosive effects.
Primary Skin Irritation (Rabbits) — Negative (undiluted); noncorrosive and not a primary skin irritant.
Acute Dermal Toxicity (LD₅₀ - Rabbits) — Above 2 g/kg (undiluted).
Additional Testing:
Bacterial Mutagenic (Ames) Test — Nonmutagenic.

REACTIVITY DATA

- Stability — Stable.
Hazardous polymerization — Will not occur.
Incompatibility (materials to avoid) — Avoid contact of concentrate with strong acid.
What volatile products are given off if subjected to open flame or abnormally high temperatures — Water vapor, carbon dioxide, and organic vapors.

SPILL OR LEAK PROCEDURES

- Steps to be taken if material is released or spilled — Flush with water.
Recommended disposal method(s) — Ultrafiltration, acid-alum-polymer chemical treatment or high temperature incineration.

SPECIAL PROTECTION INFORMATION

- Respiratory Protection — None required.
Ventilation — No special requirements.
Protective Gloves — Not required.
Eye Protection — Safety goggles recommended when handling concentrate.
Other Protective Equipment — Normal metalworking plant protective equipment.

SPECIAL PRECAUTIONS

- Handling and Storage — None required.
Precautionary Labeling — See product label. Product labels for use in shop available to bulk users.

Minor formulation changes and normal variations in the manufacture of this product may cause slight variances in the data presented on this sheet.

Products Division | Cincinnati Milacron Marketing Company
Cincinnati, Ohio 45209

PC794-6

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Elco Corporation

Invoice Date	Order Number	Invoice Number	Invoice Number	Waste Description	Quantity	Ranking
10/24/74	8461	NA	NA	TRICHLORETHYLENE	61.00	Yes
Total Waste Counted Towards Ranking					61.00	

ELCO CORPORATION



CORPORATION

ELCO HUNTINGDON DIVISION

PACIFIC 2200 PARK PLACE
EL SEGUNDO, CALIF. 90245

WILLOW GROVE, PENNA. 15090

HUNTINGDON INDUSTRIAL PARK
HUNTINGDON, PENNA. 16822

SHIPPING MEMORANDUM

6-14580

No. 8461

PLEASE SHOW THIS NO. ON ALL PACKAGES AND CORRESPONDENCE.

*Drawn
Buck
10/24/74*

TO: **Chem Clene Corporation** SHIP TO:
R.D. 1 Box 26
Malvern, Penna. 19355

ATTN: **Noyd Bolderson**

10/24/74

DB:mk

OUR ORDER NO.	YOUR ORDER NO.	SHIP VIA	PPD.	<input checked="" type="checkbox"/>	NO. PACKAGES	DATE SHIPPED
		<i>Then PLU</i>			<i>4</i>	<i>10-28-74</i>
REC. REPORT NO.	DATE RECEIVED	BUYER	MATERIAL LOCATION		CARRIER	

ITEM	QUANTITY	PART NUMBER	DESCRIPTION	UNIT PRICE	AMOUNT
1	<i>61</i> 60	660 lb. drums	trichlorethylene for salvage Chem Clene will repay Elco Corp.-Huntingdon Division at the rate of .03/lb.# for material recovered.	<i>n/c</i>	
<i>Paid ck# 7727 1-27-75</i>					
INCOMING TRANSPORTATION					
OUTGOING TRANSPORTATION					
TOTAL DEBIT					

- The value of this debit has been charged to your account.
- If replacement shipment is required, reference must be made to the number noted above.
- Replacement shipment is subject to terms and conditions of our original order.
- New invoices must be submitted on all returned goods.

Packed By _____

Shipped By *Jim White*

Received By *Jack Bednert*



PACIFIC 2200 PARK PLACE
EL SEGUNDO, CALIF. 90245

CORPORATION WILLOW GROVE, PENNA. 15090

ELCO HUNTINGDON DIVISION HUNTINGDON INDUSTRIAL PARK
HUNTINGDON, PENNA. 16822

**DEBIT
MEMORANDUM**

6-14580

No.

PLEASE SHOW THIS NO.
ON ALL PACKAGES AND
CORRESPONDENCE.

TO: Chem Clene Corporation SHIP
R.D. 1 Box 26 TO:
Malvern, Penna. 19355

g
10/24/74
ATTN: Hoyd Bolderson

OUR ORDER NO.	YOUR ORDER NO.	SHIP VIA	PPD.	COLL.	NO. PACKAGES	DATE SHIPPED
REC. REPORT NO.	DATE RECEIVED	BUYER	MATERIAL LOCATION		CARRIER	

ITEM	QUANTITY	PART NUMBER	DESCRIPTION	UNIT PRICE	AMOUNT
1	61 60	660 lb. drums	trichlorethylene for salvage Chem Clene will repay Elco Corp. - Huntingdon Division at the rate of .03/Ea.# for material recovered. <i>Obs 18,650</i> <i>Remission tax</i> <i>Net 17,250</i> <i>4.145 @ 16.</i> <i>63¢ =</i> <i>26124.44</i>	N/c	
			INCOMING TRANSPORTATION		
			OUTGOING TRANSPORTATION		
			TOTAL DEBIT		

1. The value of this debit has been charged to your account.
2. If replacement shipment is required, reference must be made to the number noted above.
3. Replacement shipment is subject to terms and conditions of our original order.
4. New invoices must be submitted on all returned goods.

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Ervins Crafts

Invoice Date	Invoice Number	Invoice Number	Invoice Number			Counted Towards Ranking
2/20/87	2030	14180	PAB 3051904	WASTE TRICHTHORETHYLENE	5.00	Yes
Total Waste Counted Towards Ranking					5.00	

INVOICE

CHEMCLENE CORPORATION
(Solvents, Equipment & Waste Disposal)
258 N. PHOENIXVILLE PIKE, MALVERN, PA 19355-1128
(215) 644-2986

No. 14180

Irvin's Crafts
RD#1
Box 45
Mt. Pleasant Mills, PA 17853

SHIPPED TO

Same

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	SHIPPED VIA	MANIFEST NO.	
2/20/87	2/20/87	2030	verbal	net 30	OT	PAB 3051904	
QUANTITY	DESCRIPTION					PRICE	AMOUNT
5 Drs.	Removed for processing and/or disposal: Waste Trichlorethylene					\$ 65.00	\$ 325.00
	Transportation					Ea. Dr.	\$ 500.00
	Insurance surcharge...						\$ 123.75
							\$ 948.75

PAID
CHECK No. 10991
DATE 3/19/87

THANK YOU

MANIFEST

CHEMCLENE CORPORATION
MALVERN, PA.
(215) 644-2908

VF 2002
2930
PA33051904

DATE Feb 20 1987

GENERATOR Ervin's Crafts CODE _____

WASTE DESCRIPTION QUANTITY REMARKS
Waste Trichloroethylene 5 drums AKWTS

CHEMCLENE EMPLOYEE A. Dippell

AUTHORIZED SIGNATURE FOR GENERATOR Amos Hoover

5 drs. @ 65/m
TRANSPORT 100
325
500
1.5 123.75
948.75

DISPOSAL TREATMENT FACILITY Chemcylene Corp.

DATE RECEIVED 2/20/87

FACILITY EMPLOYEE GD

WHITE - OFFICE PINK - INVOICE
YELLOW - GENERATOR GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

VENDOR: 000718

CHECK NO. 10991

OUR REF. NO.	YOUR INV. NO.	INVOICE DATE	INVOICE AMOUNT	AMOUNT PAID	DISCOUNT TAKEN	NET CHECK AMOUNT
3621	00014180	02/20/87	948.75	948.75	.00	948.75
					CHECK TOTAL	948.75

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: K - D Tool Manufacturing

Invoice Date	Order Number	Invoice Number	Invoice Number	Material Description	Quantity	Yes/No
8/26/81	250	8779	NA	WASTE TRICHLORETHYLENE	25.00	Yes
8/26/81	253	8779	NA	TRICHLORETHYLENE	6.00	Yes
11/5/82	504	10842	PAA 4765456	WASTE TRICHLORETHYLENE	20.00	Yes
5/20/83	630	11253	NA	WASTE TRICHLORETHYLENE	11.00	Yes
12/13/83	805	11748	PAA 4768411	WASTE TRICHLORETHYLENE	8.00	Yes
6/20/84	1007	12195	PAA 2559244	WASTE TRICHLORETHYLENE	10.00	Yes
4/11/85	1312	12856	PAB 00891026	WASTE TRICHLORETHYLENE	15.00	Yes
Total Waste Counted Towards Ranking					95.00	

INVOICE

No.

385451

SHIPPED TO

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	F.O.B.	SALESPERSON	SHIPPED VIA
PAID						PRICE	AMOUNT
CHECK NO. <u>52039</u>							
DATE <u>5/20/85</u>							

FOLD HERE

NO. 64144, RAPIDFORMS, INC., BELLMAWR, N.J. 08031

THANK YOU

MANIFEST

P.O. #
46074

CHEMCLENE CORPORATION

MALVERN, PA.

(215) 644-2986

DATE April 11, 1990

GENERATOR R-D Tool Manufacturing CODE _____

WASTE DESCRIPTION QUANTITY REMARKS

White Toluene Hydrocarbons 15 drums

CHEMCLENE EMPLOYEE M. Duggan

AUTHORIZED SIGNATURE FOR GENERATOR _____

[Faint handwritten text]

DISPOSAL TREATMENT FACILITY Chemco Corp

DATE RECEIVED 4/11/90

FACILITY EMPLOYEE D

WHITE - OFFICE
YELLOW - GENERATOR

PINK - INVOICE
GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

PURCHASE NUMBER
40074
 ALL SHIPMENTS MUST USE ABOVE P.O. NO.,
 PART NO., QUANTITY AND SUPPLIER.

Easco/K-D Tools

PHONE 717-285-4581
 TELEX NO. 848429
 DUNS 300-8885

*PLEASE PROMPTLY COMPLETE AND RETURN THE ACKNOWLEDGEMENT

BILL TO:
 K-D MANUFACTURING CO.
 3575 HEMPLAND ROAD
 LANCASTER, PA. 17604

P.O. SUBJECT TO TERMS & CONDITIONS ON THE REVERSE SIDE.

TO: Chemclene Corp.
258 N. Phoenixville Pike
Malvern, PA 19355

SHIP TO:
 K-D MANUFACTURING CO.
 3575 HEMPLAND ROAD
 LANCASTER, PA. 17604

PA. BLANKET SALES TAX EXEMPTION APPLICABLE

YES NO

SHIP ALL MATERIAL PREPAID ADD CHARGES TO INVOICE

VENDOR NO. 999999	DATE 4/12/85	DATE REQUIRED 4/11/85	SHIP VIA Pick Up	F.O.B. KD	PAYMENT TERMS
DELIVER TO 303	CONFIRMATION YES	REQUISITION NO. 20592	REQUISITIONED BY Lagowski		

ITEM	QUANTITY	E.D.P.#	DESCRIPTION OF MATERIAL	PRICE	U/M	ACCOUNT NO.
1	15		Remove 15 drums of waster trichlorethelene \$65.00/drum Confirmed for Thursday 4/11 pickup	975.00		3124-351
PHONE ORDER CONFIRMATION				TOTAL EXTENDED VALUE		

UPON RECEIPT OF THIS ORDER, ANY DISCREPANCIES IN THE ABOVE ORDER SHOULD BE BROUGHT TO THE ATTENTION OF EASCO/K-D.


 AUTHORIZED SIGNATURE
E.C. Tritt

INVOICE NUMBER	INVOICE			VOUCHER NUMBER	P.O NUMBER	INVOICE AMOUNT	DISCOUNT AMOUNT	NET AMOUNT
	MO	DAY	YR					
12856	04	11	85	5041214	40074	975.00 975.00	.00 .00 *	975.00 975.00 *

3575 HEMPLAND ROAD, LANCASTER, PA 17601

INVOICE

No.

SHIPPED TO

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	F.O.B.	SALESPERSON	SHIPPED VIA
6/25/34		1007	1-140				
PAID CHECK NO. 039612 Aug. 19, 1984							

FOLD HERE

THANK YOU

MANIFEST

CHEMCLENE CORPORATION

MALVERN, PA.

(215) 644-2986

DATE _____

GENERATOR K-D Tool Man CODE _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Trichloroethylene</u>		

CHEMCLENE EMPLOYEE _____

AUTHORIZED SIGNATURE FOR GENERATOR _____

10 GAS. WASTE TRICHO
FOR PROCESSING AT

DISPOSAL TREATMENT FACILITY ChemClen

DATE RECEIVED _____

FACILITY EMPLOYEE _____

WHITE - OFFICE
YELLOW - GENERATOR

PINK - INVOICE
GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

PURCHASE NUMBER
38140
ALL SHIPMENTS MUST USE ABOVE P.O. NO.,
PART NO., QUANTITY AND SUPPLIER.

Easco / K-D Tools

PHONE 717-285-4581
TELEX NO. 84B429
DUNS 300-8885

PLEASE
ACKNOWLEDGE

BILL TO:
K-D MANUFACTURING CO.
3575 HEMPLAND ROAD
LANCASTER, PA. 17604

P.O. SUBJECT TO TERMS & CONDITIONS ON
THE REVERSE SIDE.

TO:
CHEMCLENE CORP.
258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

SHIP TO:
 K-D MANUFACTURING CO.
3575 HEMPLAND ROAD
LANCASTER, PA. 17604

PA. BLANKET SALES TAX EXEMPTION APPLICABLE YES NO SHIP ALL MATERIAL PREPAID ADD CHARGES TO INVOICE

VENDOR NO 999999	DATE 6/14/85	DATE REQUIRED 6/21/84	SHIP VIA BEST WAY	F.O.B. K-D	PAYMENT TERMS
---------------------	-----------------	--------------------------	----------------------	---------------	---------------

DELIVER TO	CONFIRMATION YES - K. GRAVER	REQUISITION NO 16922	REQUISITIONED BY M. RESSEL
------------	---------------------------------	-------------------------	-------------------------------

ITEM	QUANTITY	E.D.P.#	DESCRIPTION OF MATERIAL	PRICE	U/M	ACCOUNT NO.
1	10 DRUMS		XXXX REMOVE/DISPOSE OF SPENT DEGREASE SOLVENT (TRICHLOR)	650.00		303-024
TOTAL EXTENDED VALUE						

UPON RECEIPT OF THIS ORDER, ANY
DISCREPANCIES IN THE ABOVE ORDER SHOULD
BE BROUGHT TO THE ATTENTION OF
EASCO/K-D.

E. C. Tripp
E. C. TRIPP AUTHORIZED SIGNATURE

INVOICE NUMBER	INVOICE			VOUCHER NUMBER	P.O. NUMBER	INVOICE AMOUNT	DISCOUNT AMOUNT	NET AMOUNT
	MO.	DAY	YR.					
12195	06	20	84	4063032	33140	650.00 650.00	.00 .00 *	650.00 650.00 *

CHECK NO: 099817
 Remittance Advice - Detach and Retain This Statement

3575 HEMPLAND ROAD, LANCASTER, PA 17601

INVOICE

CHEM-DRE CORPORATION
Solvency Equipment & Waste Management
258 N. PINEVILLE PK. WYOMING, PA. 17361
(215) 644-2223

No.

K & D Book Manufacturing
3575 R... and Road
Lancaster, Pa. 17601

SHIPPED TO

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	FOB	SALESPERSON	SHIPPED VIA	
12-13-83	12-17-83	805	35020					
DESCRIPTION							PRICE	AMOUNT
8 lbs.	Waste trichloroethylene disposal Material under manifest							
PAID CHECK No. 010 019609 DATE Feb. 2, 1984								

FORM 84144 RAPIDFORM INC., BELLMAWR, N.J. 08031

THANK YOU

MANIFEST

CHEMCLENE CORPORATION

MALVERN, PA.

(215) 644-2986

DATE 11/11/88

GENERATOR Chem-Cleene, Inc. CODE _____

WASTE DESCRIPTION QUANTITY REMARKS

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Acetic Acid</u>	<u>2.5</u>	

CHEMCLENE EMPLOYEE [Signature]

AUTHORIZED SIGNATURE FOR GENERATOR _____

DISPOSAL TREATMENT FACILITY Chem-Cleene, Inc.

DATE RECEIVED 11/11/88

FACILITY EMPLOYEE [Signature]

WHITE – OFFICE
YELLOW – GENERATOR

PINK – INVOICE
GOLD – PLANT

DO NOT WRITE BELOW THIS LINE

PURCHASE NUMBER
35029
 ALL SHIPMENTS MUST USE ABOVE P.O. NO.,
 PART NO., QUANTITY AND SUPPLIER.



PHONE 717-285-4581
 TELEX NO. 848429

*PLEASE PROMPTLY COM-
 PLETE AND RETURN THE
 ACKNOWLEDGEMENT

"make tough jobs easy"

P.O. SUBJECT TO TERMS & CONDITIONS ON
 THE REVERSE SIDE.

TO:

CHEMCLENE CORP
258 N. PHOENIXVILLE PIKE
MALVERN, PA. 19355

SHIP TO:

K-D MANUFACTURING CO.
 3575 HEMPLAND ROAD
 LANCASTER, PA. 17604

BILL TO:

K-D MANUFACTURING CO.
 P.O. BOX 1767
 LANCASTER, PA. 17604

PA. BLANKET SALES TAX EXEMPTION APPLICABLE YES NO
 SHIP ALL MATERIAL PREPAID ADD CHARGES TO INVOICE

VENDOR NO 999999	DATE 12-7-83	DATE REQUIRED 12-13-83	SHIP VIA BEST WAY	FOB K D	PAYMENT TERMS
DELIVER TO	TOOL NO	REQ. NO			
ITEM	QUANTITY	DESCRIPTION OF MATERIAL		PRICE	ACCOUNT NO

1	7 DRUMS	USED TRICHLOROETHYLENE TO BE REMOVED	420.00	303-024
---	---------	--------------------------------------	--------	---------

PURCHASE ORDER

AUTHORIZED SIGNATURE

CLIFF TRITT

ORIGINAL

INVOICE NUMBER	INVOICE			VOUCHER NUMBER	P.O. NUMBER	INVOICE AMOUNT	DISCOUNT AMOUNT	NET AMOUNT
	MO.	DAY	YR.					
11748	12	13	83	3121374	35029	480.00	.00	480.00
						480.00	.00 *	480.00 *

K-DIGS, a Division of Eagle Corporation
 CHECK NO. 019809
 Remittance Advice - Detach and Retain This Statement

3576 HEMPLAND ROAD, LANCASTER, P.

INVOICE

No.

Equipment
(215) 600-1111

SHIPPED TO

8. I. ...
1075 ...
March 10, 1983

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	FOB	SALESPERSON	SHIPPED VIA
5-20-83	5-	530					
						PRICE	AMOUNT
11 in	Wash	disposal					
PAID CHECK No. 811229 DATE 7-21-83							

FORM 64144 RAPIDFORMS, INC., BELLMAWR, N.J. 08031

THANK YOU

MANIFEST

CHEMCLENE CORPORATION

MALVERN, PA.

(215) 644-2986

DATE 11/11/88

GENERATOR 1000 1111 CODE _____

WASTE DESCRIPTION	QUANTITY	REMARKS

CHEMCLENE EMPLOYEE [Signature]

AUTHORIZED SIGNATURE FOR GENERATOR _____

DISPOSAL TREATMENT FACILITY _____

DATE RECEIVED _____

FACILITY EMPLOYEE _____

WHITE - OFFICE
YELLOW - GENERATOR

PINK - INVOICE
GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

PURCHASE NUMBER
33208
 ALL SHIPMENTS MUST USE ABOVE P.O. NO.,
 PART NO., QUANTITY AND SUPPLIER.



PHONE 717-285-4581
 TELEX NO. 848429

*PLEASE PROMPTLY COM-
 PLETE AND RETURN THE
 ACKNOWLEDGEMENT

"make tough jobs easy"

BILL TO:
 K-D MANUFACTURING CO.
 P.O. BOX 1767
 LANCASTER, PA. 17604

P.O. SUBJECT TO TERMS & CONDITIONS ON
 THE REVERSE SIDE.

TO:

CHEMCLENE CORP.
 MALVERN, PA 19355

SHIP TO:

K-D MANUFACTURING CO.
 3575 HEMPLAND ROAD
 LANCASTER, PA. 17604

PA. BLANKET SALES TAX EXEMPTION APPLICABLE YES NO

SHIP ALL MATERIAL PREPAID ADD CHARGES TO INVOICE

VENDOR NO. 999999	DATE 5/23/83	DATE REQUIRED N/A	SHIP VIA	F.O.B.	PAYMENT TERMS
DELIVER TO	TOOL NO.	REG NO. 25680			

ITEM	QUANTITY	DESCRIPTION OF MATERIAL	PRICE	ACCOUNT NO
1	11 DRUMS	REMOVED USED TRICHORETHYLENE	58.00/EA	303-02
<p>CONFIRMING ORDER</p> <p>WORK ALREADY PERFORMED</p> <p>PURCHASE ORDER</p>				

Cliff Tritt
 AUTHORIZED SIGNATURE

ORIGINAL

CLIFF TRITT

INVOICE

ENVIRONMENTAL CORPORATION
Solvents, Equipment & Waste Disposal
330 N. PHOENIXVILLE PK • MALVERN, PA 19353
(215) 244-2300

No.

SHIPPED TO

K-D Tool Manufacturing
3575 Hempland Road
Lancaster, Pa. 17604

INVOICE DATE	DATE SHIPPED	QUANTITY NO.	YOUR ORDER NO.	TERMS	F O B	SALESPERSON	SHIPPED VIA
11-5-82	11-5-82	500	VERDE				
20 Drs.	Waste trichlorethylene rework and disposal						
	Material under manifest						

PAID
CHECK NO. 3386
DATE Jan 6, 1983

THANK YOU

MANIFEST

CHEMCLENE CORPORATION

MALVERN, PA.

(215) 644-2986

DATE Apr 5 1991

GENERATOR Ko... CODE _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Treatment</u>	<u>...</u>	

CHEMCLENE EMPLOYEE J...

AUTHORIZED SIGNATURE FOR GENERATOR _____

20 bags. waste for processing

DISPOSAL TREATMENT FACILITY ...

DATE RECEIVED ...

FACILITY EMPLOYEE ...

WHITE - OFFICE
YELLOW - GENERATOR

PINK - INVOICE
GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

INVOICE NUMBER	INVOICE			VOUCHER NUMBER	P.O. NUMBER	INVOICE AMOUNT	DISCOUNT AMOUNT	NET AMOUNT
	MO.	DAY	YR.					
10842	11	05	82	2110286	00000	1,160.00 1,160.00	.00 .00	1,160.00 1,160.00

3875 HEMPLAND ROAD, LANCASTER, PA 10

K&D TOOLS, INC.
CHECK NO. 003386

MANIFEST

CHEMCLENE CORPORATION

MALVERN, PA.

(215) 644-2986

DATE _____

GENERATOR _____ CODE _____

WASTE DESCRIPTION QUANTITY REMARKS

WASTE DESCRIPTION	QUANTITY	REMARKS

CHEMCLENE EMPLOYEE _____

AUTHORIZED SIGNATURE
FOR GENERATOR _____

a lot of light deums

DISPOSAL TREATMENT
FACILITY _____

DATE RECEIVED _____

FACILITY EMPLOYEE _____

WHITE - OFFICE
YELLOW - GENERATOR

PINK - INVOICE
GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

DATE RUN 12/2 To 12/10/82 HEEL 275

YIELD 535 DISPOSITION _____

CHEMCLENE CORPORATION

INVOICE NO.

BOX 26, R. D. #1
MALVERN, PENNSYLVANIA 19355
215 - 644-2986

5779

Sold to:

**Inland Pumping and Dredging Corp.
P.O. Box 140
Downingtown, Pa. 19335**

Date of Invoice:

Aug 26, 1981

Your Order Number:

Terms:

Net 30 days

Delivery Ticket No.

PAID

_____	PERCHLORETHYLENE _____	lb. net @ _____
_____	TRICHLOROETHYLENE _____	lb. net @ _____
_____	METHYLENE CHLORIDE _____	lb. net @ _____
_____	1-1-1 TRICHLOROETHANE _____	lb. net @ _____

CHECK No. 2077
DATE Oct. 15/1981

**Generator 1
KAB Reg.**

Twenty-five (25) drums waste trichloroethylene removed for processing and disposal @ \$ 40.00 ea.	Total	\$1,000.00
six (6) drums waste trichloroethylene removed for processing and disposal @ \$ 40.00 ea.	Total	\$ 240.00

MANIFEST

Bill
inlms
40/drum
1000.00

CHEMCLENE CORPORATION
MALVERN, PA.
(215) 644-2986

NR 250

PIA 0129581

DATE 8/26/81

GENERATOR K+D Manufacturing CODE _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Trichlorethylene</u>	<u>25 Drums</u>	

CHEMCLENE EMPLOYEE George D. Spill

AUTHORIZED SIGNATURE FOR GENERATOR Mark S. Bensch

DISPOSAL TREATMENT FACILITY Chemcylene Corp.

DATE RECEIVED 8/26/81

FACILITY EMPLOYEE RJS

WHITE - OFFICE PINK - INVOICE
YELLOW - GENERATOR GOLD - PLANT

Invoice # 8779 NOT WRITE BELOW THIS LINE

MANIFEST

BILL
INLAND

CHEMCLENE CORPORATION
MALVERN, PA.
(215) 644-2986

NR 253

PA A 0129614

DATE 8/31/01

GENERATOR AK MFR CODE _____

WASTE DESCRIPTION QUANTITY REMARKS

~~TFI~~ TFI 6

CHEMCLENE EMPLOYEE _____

AUTHORIZED SIGNATURE FOR GENERATOR _____

J. D. Lupton
Mark R. Beene

\$46/drum
*240.00

DISPOSAL TREATMENT FACILITY _____

Chemcylene

DATE RECEIVED _____

8/31

FACILITY EMPLOYEE _____

J. D. Lupton

WHITE - OFFICE
YELLOW - GENERATOR

PINK - INVOICE
GOLD - PLANT

Invoice # 9779 DO NOT WRITE BELOW THIS LINE

CHEMICAL CORPORATION

VERM, PA.

644-2986

753

DATE 5-1-71

CODE _____

QUANTITY REMARKS

PINK - INVOICE
GOLD - PLANT

WRITE BELOW THIS LINE

HEEL 100 gals

DISPOSITION _____

CHEMICAL CORPORATION

BERN, PA.

844-2986

DATE 1/1

D. Marshall CODE _____

QUANTITY REMARKS

QUANTITY	REMARKS

TYPE
NATURE

AMOUNT

DATE

LOCATION

PINK - INVOICE
GOLD - PLANT

WRITE BELOW THIS LINE

HEEL 450 gals

DISPOSITION _____

INVOICE NUMBER	INVOICE			VOUCHER NUMBER	P.O. NUMBER	INVOICE AMOUNT	DISCOUNT AMOUNT	NET AMOUNT
	MO.	DAY	YR.					
11253	05	2	1989	3050826	22418	638.00 638.00	.00 .00 *	638.00 638.00 *

3675 HEMPLAND ROAD, LANCASTER, PA 1

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PENNSYLVANIA 19356

25 October 1988

Mr. Paul Lagowski
K-D Tool
3575 Hempland Road
Lancaster, PA 17604

Dear Mr. Lagowski:

This is in answer to your phone call of several weeks ago when you asked for information regarding the removal of waste Trichloroethylene from K-D Tool by Chemcylene.

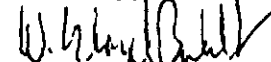
Our records indicate the following dates of removal and quantity removed:

11/5/82	20 drums
5/20/83	11 drums
12/13/83	8 drums
6/20/84	10 drums
4/11/85	15 drums

As you may know, this material was brought back to our facility in Malvern where it was recycled through distillation. The clean solvent was sold to some of our customers, while the still bottoms were incinerated.

Please let me know if you need any additional information or have any questions.

Sincerely,


W. Lloyd Balderston

WLB

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PENNSYLVANIA 19355

December 11, 1986

Mr. Paul Lagowski
Eascol/K-D Tool
3575 Hempland Road
Lancaster, PA 17604

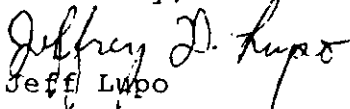
Dear Mr. Lagowski :

It was a pleasure meeting you and discussing your waste disposal problems. We have sampled your waste trichloroethylene and have taken a long, hard look at your situation. Your problem with this waste stream is that your supplier refuses, or at the very least, is hesitant to provide disposal service. We feel that a distributor of chlorinated solvent should be responsible enough to help thjeir customers on the waste side of their business. We have done this on a regular basis for many companies for over thirty years, regardless of the quality of waste. If Chemclene were to remedy your present situation, our service would really be to your present supplier; our competition. Therefore, we respectfully decline to bid on the removal of your waste trichlorethylene and contaminated solids. If you have any questions about our position, please call.

As to your future need for disposal of large carbon water filters, we suggest that large carbon water filters, we suggest that your situation is much the same. If your supplier can't offer disposal as a service, they are only giving you half of what you need. The only alternative we might suggest is Resource Technology Services of Devon, PA. or Eldredge Inc., of West Chester, PA. These are both competent disposal firms.

We wish you good luck.

Sincerely,


Jeff Lupo

JL/cm

CHEMCLENE CORPORATION

MALVERN, PENNSYLVANIA 19355

(258 N. Phoenixville Pike)

October 26, 1982

Mr. Park Appler
K-D Tools
3575 Hempland Road
Lancaster, Pa. 17604

Dear Mr. Appler,

We are pleased to present you with the following proposal for your consideration. Chemclene can supply you with virgin trichlorethylene in the following lot sizes with corresponding prices;

One to ten 55 gallon drums - \$.3580 per pound.
Eleven or more 55 gallon drums - \$.3180 per pound.

Chemclene is also capable of delivering solvent in bulk quantities. We can supply you with a storage tank at no charge. Delivering virgin trichlorethylene to such a tank would lower the price to \$.2860 per pound.

As you know, Chemclene is a licensed transporter and treatment storage facility for hazardous waste (EPA ID# PADO14353445). Therefore it always is our desire to serve customers in both waste recovery and disposal and supply. We have recently sampled your waste trichlorethylene. Our analysis shows we can remove and reclaim/dispose of this material for the cost of \$58.00 per 55 gallon drum. When handling waste material, we act with the strictest accordance to the law. Therefore all drums of waste must have proper bungs, normal shape and show no sign of possible leakage. Our driver is the final judge of drum integrity. We will supply labels and manifests for proper documentation.

We thank you very much for this opportunity and look forward to being of service to K-D Tool.

Sincerely,


Jeff Lupo

JL/cm

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 8/10/98

PRP Name: Maida Development

[REDACTED]						
10/23/82	498	11059	PAA1231521	WASTE 1,1,1 TRICHLORETHANE, METHYLEN	57.50	Yes
Total Waste Counted Towards Ranking					57.50	

INVOICE

CHRYSOLENE CORPORATION
Process, Equipment & Waste Disposal
1200 PROXIMITY PK • MALVERN, PA 19355
(717) 844-8888

No.

385499

SHIPPED TO

Resource Technology Services, Inc.
6 Berkeley Road
Devon, Pa. 19333

DATE	ORDER NO.	YOUR ORDER NO.	TERMS	FOB	SALESPERSON	SHIPPED VIA	
12-18-83	Oct 23 '82	498	verbal			OT	
					PRICE	AMOUNT	
25,305 Lbs.	Waste 1-1-1, trichloroethane/Methylene Chloride						
7 Drums 1 Drum	Still Bottoms Liquid " " Solid						
PAID							
Check #12157 Enclosed							
Waste material under manifest # PAA 1231521							
CHECK No. 12157							
DATE 2-18-82							

THANK

MANIFEST

VF 1872

CHEMCLENE CORPORATION

498

MALVERN, PA.

10.23.82

(215) 644-2986

DATE 10.23.82

GENERATOR _____ CODE _____

WASTE DESCRIPTION	QUANTITY	REMARKS

CHEMCLENE EMPLOYEE _____

AUTHORIZED SIGNATURE FOR GENERATOR _____

DISPOSAL TREATMENT FACILITY _____ Corp

DATE RECEIVED _____

FACILITY EMPLOYEE _____

WHITE - OFFICE
YELLOW - GENERATOR

PINK - INVOICE
GOLD - PLANT

DO NOT WRITE BELOW THIS LINE

ORATION

DATE _____

CODE _____

QUANTITY

REMARKS

6.1

to be run AS MIX

PINK - INVOICE
GOLD - PLANT

WRITE BELOW THIS LINE

HEEL

375 liquid

DISPOSITION

06/07

06/07 70000 0000 2001

06/07 70000 0000 2001

06/07 70000 0000 2001

- 174

- 28/21

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: McHugh Railroad Maint Equip Co.

[REDACTED]						
4/23/92	3788	17484	PAC6119702	WASTE 1,1,1 TRICHLOROETHANE	3.00	Yes
4/23/92	3769	17484	PAC1789992	WASTE 1,1,1 TRICHLOROETHANE	1.00	Yes
Total Waste Counted Towards Ranking					4.00	

McHUGH RAILROAD MAINTENANCE
EQUIP. CO.

INVOICE

CHEMCLENE CORPORATION

(Solvents, Equipment & Waste Disposal)

258 N. PHOENIXVILLE PIKE - MALVERN, PA 19355-1126

(215) 644-2986

SHIPPED TO

McHugh Railroad Maintenance Equip. Co.
225 Lincoln Highway
Fairless Hills, PA 19030

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	SHIPPED VIA	MANIFEST NO.	
4/23/92	4/7 & 23	3769,88	J.C. McH.	Net 30	OT	PAC6119702	
QUANTITY	DESCRIPTION				PRICE	AMOUNT	
4 drs	Waste 1,1,1-Trichloroethane removed for disposal				\$140	\$ 560.00	
	Insurance surcharge					84.00	
	PA Superfund Tax					6.00	
	Total due.....					\$ 650.00	
						A 1260	

THANK YOU

APC 6119702
NO 8788

INTERNAL
MANIFEST

CHEMCLENE CORPORATION
258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355
(215) 644-2886

DATE April 23 1992

GENERATOR McHugh Railroad Maintenance

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste 1-1-1 Trichloroethane</u>	<u>3</u>	<u>drums</u>

AUTHORIZED SIGNATURE FOR GENERATOR Jc. McHugh

WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

PAC 178999Z

INTERNAL
MANIFEST

NO 3769

CHEMCLENE CORPORATION

250 N. PHOENIXVILLE PIKE
MALVERN, PA 19358

(215) 644-2988

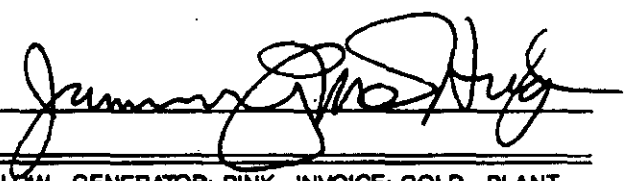
DATE April 7, 1992

GENERATOR McHugh Railroad Maintenance

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste 1-1-1 Trichloroethane</u>	<u>1 drum.</u>	

AUTHORIZED SIGNATURE
FOR GENERATOR



WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PENNSYLVANIA 19358-1126

23 March 1992

Mr. J. C. McHugh
McHugh Railroad Maintenance Equipment Co.
225 Lincoln Highway
Fairless Hills, PA 19030

RE: Waste 1,1,1-Trichloroethane

Dear Mr. McHugh:

Chemcylene Corporation is pleased to confirm in writing the acceptance of the above captioned waste. We are permitted to, have the capacity to and are willing to receive this material.

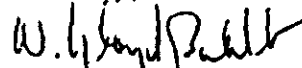
This acceptance is based on samples of the waste material received, the laboratory analysis of those samples and any other information given by your company to Chemcylene. Chemcylene may refuse to accept any material that does not substantially match any of the information originally submitted.

This waste stream must be re-sampled and analysed every year (from the date of this acceptance) and the results supplied to Chemcylene, if requested. Changes in the composition of the waste or the volume generated must be reported to Chemcylene immediately.

Please keep this acceptance letter with your other hazardous waste records (such as hazardous waste manifests); you may be required to show it as part of a routine State or Federal inspection.

We greatly appreciate your business. Please contact me if at any time you ever have any questions or problems.

Sincerely,


W. Lloyd Balderston

WLB

INVOICE

CHEMCLENE CORPORATION
(Solvents, Equipment & Waste Disposal)
258 N. PHOENIXVILLE PIKE, MALVERN, PA 19355-1128
(215) 644-2886

17268

McHugh Railroad Maintenance Equipment
225 Lincoln Highway
Fairless Hills, PA 19030

SHIPPED TO

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	SHIPPED VIA	MANIFEST NO.	
11/26/91	11/22/91	MODULE	J.C.McH.	Net 30			
QUANTITY	DESCRIPTION					PRICE	AMOUNT
	Analysis of and preparation of Module 1 for waste 1,1,1-Trichloroethane.					\$600	\$ 600.00 # 9848

THANK YOU

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PENNSYLVANIA 19355-1126

7 August 1991

Mr. J. C. McHugh
McHugh Railroad Maintenance Equipment Co.
500 Hulmeville Avenue
Pennel, PA 19047

Dear Mr. McHugh:

Enclosed is our Waste Characterization Form (WCF) for you to fill out. I have located the sample of waste 1,1,1-Trichloroethane we collected from your company recently. At your request, I am having this sample analysed for the submission of a Module 1 to the PA Department of Environmental Resources (PADER). The charge to complete the laboratory analysis and submit the Module 1 is \$600. It should take 3-4 weeks to get an approval from PADER.

We can remove your waste for recycling within one week after approval is received from PADER.

Call me if you have any questions about filling out the WCF.

Sincerely,


W. Lloyd Balderston

WLB

Enclosure.

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Photofabrication Chem & Equip

11/12/75	3896	5930	NA	ACIDIC METHYLENE CHLORIDE	2.00	Yes
11/12/75	3896	5930	NA	ACIDIC METHYLENE CHLORIDE	1.64	Yes
1/11/80	2254	7842	NA	TRIETHYLENE GLYCOL	1.00	Yes
1/11/80	2254	7842	NA	CRESYLIC ACID	0.55	Yes
1/11/80	2254	7842	NA	GLACIAL ACETIC ACID	1.00	Yes
1/11/80	2254	7842	NA	T-AMYL ALCOHOL	1.00	Yes
Total Waste Counted Towards Ranking					7.19	

Photofabrication Chemical &
Equipment (PCE)

CHEMCLENE CORPORATION

BOX 26, R. D. #1
MALVERN, PENNSYLVANIA 19355
215 - 644-2986

INVOICE NO.

7442

Date of Invoice: **Jan. 11, 1980**

Your Order Number: **Verball Bill**

Terms: **Net. 30 days**

Delivery Ticket No.: **2254**

Sold to:

**Photofabrication & Chemicals
Prager, Penns.**

_____	PERCHLORETHYLENE _____	lb. net @ _____
_____	TRICHTHORETHYLENE _____	lb. net @ _____
_____	METHYLENE CHLORIDE _____	lb. net @ _____
_____	1-1-1 TRICHTHOROETHANE _____	lb. net @ _____

Waste Removal: 3 drums.....@ \$75.00 = \$225.00
 1 drum.....@ \$75.00 = \$ 75.00
\$300.00

PAID

CHECK No. 3336
DATE: 6/19/88

CHEMCLENE CORP.

MALVERN, PA. 19355

PHONE (215)
644-2986

2254

~~VENKAT, Bill JR.~~

Date 11 JAN 1988

Sold to PROTOPAS GREN AND EQUIPMENT

Address FRAZER, PA

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER METER RECEIPT

TEMPERATURE _____ WEIGHT _____
NOTE: USE HAZARDOUS CHEMICAL MATERIAL
LEGALLY DISPOSABLE OF (SEWER LANDFILL)
YOUR SALE NO. _____ GALLON READING - FINISH _____

REMOVE FOR LEGAL DISPOSAL:
1 DR GLACIAL ACETIC ACID, 1 DR T-
AMYL ALCOHOL, 1 DR TRIETHYLENE GLYCOL

PREVIOUS SALE NO. _____ GALLON READING - START _____
GALLONS DELIVERED 1.00 GAL CRESYLIC ACID

PRODUCT	POUNDS	PRICE	TOTAL AMT
PERCHLOROETHYLENE	<u>3 DRCS</u>	<u>75.00</u>	<u>225.00</u>
TRICHLOROETHYLENE	<u>1 DR (PACK)</u>	<u>75.00</u>	<u>75.00</u>
METHYLENE CHLORIDE	<u>ADD IN OTHER</u>		<u>300.00</u>
<u>WASTE REMOVAL</u>	<u>OF VACUUMATED</u>		

CUSTOMER SIGN HERE AFTER DELIVERY

CHEMCLENE CORP.

MALVERN, PA. 19355

PHONE (215)
644-2986

2254

VERBAL, BILL JR.

Date 11 JAN 19 60

Sold to PHOTOPAS CREW AND EQUIPMENT

Address PRAZER, PA

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER RECEIPT

TEMPERATURE	WEIGHT
NOTE: (Handwritten notes)	(Handwritten notes)
YOUR SALE NO	GALLON READING FINISH

REMOVE FOR LEGAL DISPOSAL:
1 DR GLACIAL ACETIC ACID, 1 DR T-
AMYL ALCOHOL, 1 DR TRIETHYLENE GLYCOL
PREVIOUS SALE NO GALLON READING START
GALLONS DELIVERED **24.48 GAL CRESYLIC ACID**

PRODUCT	POUNDS	PRICE	TOTAL AMT
PERCHLOROETHYLENE	5.105	10.20	60.00
TRICHLOROETHYLENE	1.100	2.20	6.00
METHYLENE CHLORIDE	1.100	2.20	6.00
Handwritten notes			

X
CUSTOMER SIGN HERE AFTER DELIVERY

RECEIVING RECORD

0906

RECEIVED FROM PC + E			
ADDRESS			
PURCHASE ORDER NO. OR RETURNED GOODS		FREIGHT BILL NO.	DATE 1/11/80
VIA YT JDL GJD		PREPAID	COLLECT
1	3	Drums	} Various Corrosive wastes
2	Several	5gal cans	
3			ONLY CORROSIVE DRUM
4			→ STONE 3 OF 4 DRS TO
5			RTS WHO TOOK TO P. 1000 A
6			SITCOM - 17 JAN 80
7			
8			
9			
10			
11			
12			
REMARKS: CONDITIONS, ETC.			

NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY	DELIVERED TO
--------------	--------	-------------	------------	--------------

Rediform®
2H 259

**BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE**

RECEIVING RECORD

0906

RECEIVED FROM PC+E
ADDRESS

PURCHASE ORDER NO. OR RETURNED GOODS	FREIGHT BILL NO.	DATE 1/11/80
VIA YT JDL GJD		PREPAID <input type="checkbox"/> COLLECT <input checked="" type="checkbox"/>

QUANTITY	ITEM NUMBER	DESCRIPTION
1	3	Drums
2	Several	5gal/can
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		

REMARKS: CONDITIONS, ETC.

NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY	DELIVERED TO
--------------	--------	-------------	------------	--------------

Rediform®
2H 259

**BE SURE TO MAKE THIS
RECORD ACCURATE AND COMPLETE**

Nigera 4-2986

INVOICE 5930

CHEMCLENE CORPORATION
MALVERN, PENNSYLVANIA

Date of Invoice *7/12*
~~Oct. 20~~, 1975

Your Order Number **Keep Full**

Terms: **Net, 30 days**

Sold to
Photogalvanization Chemical & Equip.
Punxsutawney, Penna. 15855

Ticket #450

_____	PERCHLORETHYLENE	_____ <i>PA II (b)</i> @ _____
_____	TRICHOETHYLENE	_____ <i>743</i> @ _____
_____	METHYLENE CHLORIDE	CHECK No. _____ DATE <i>12/31/75</i> @ _____
_____	1-1-1 TRICHLOROETHANE	_____ lb @ _____

2 drums reclaimed solvent 1098.8 lbs. @16c/lb. = \$175.81

CHEMCLENE CORP.

MALVERN, PA. 19355

PHONE (215)
644-2986

450

Date OCT 20 19 75

Sold to PCE COMPANY

Address FRAZER, PA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER METER RECEIPT

YOUR SALE NO. GALLON READING FINISH

**TWO DRUMS RECLAIMED SOLVENT
RETURN OF TWO PLASTIC DRUMS & 17.5 GAL**

PREVIOUS SALE NO. GALLON READING START **CANS**

GALLONS DELIVERED

PRODUCT	POUNDS	PRICE	TOTAL AMT
PERCHLORETHYLENE			
TRICHOLORETHYLENE			
METHYLENE CHLORIDE	1098.8	.16	175.81

X *[Signature]*
CUSTOMER SIGNATURE AFTER DELIVERY

attach to Invoice

RECEIVING RECORD

No. 3896	DATE Oct 14 1975	PURCHASE ORDER NO. OR RETURNED GOODS
RECEIVED FROM PCE	PREPAID	
ADDRESS	COLLECT	
VIA Che. Stake BJD	FREIGHT BILL NO.	

QUANTITY	ITEM NUMBER	DESCRIPTION
1	2	Drum Acidic MC.
2	13	Cans (5gal) Acidic MC.
3		
4		Prod. 100 gal.
5		
6		Oct 20, 1975
7		
8		
9		
10		
11		
12		

REMARKS: CONDITIONS, ETC.

NO. PACKAGES	WEIGHT	RECEIVED BY	CHECKED BY	DELIVERED TO
--------------	--------	-------------	------------	--------------

Rediform
2H 260

No. 915-41 Date 10/10 1975

Name PC + E

Address 522 Lancaster Ave

SOLD BY	CASH	C. O. D.	CHARGE	ON ACCT.	MOSE. PAID OUT	REID.
						Frezer
QUAN.	DESCRIPTION			PRICE	AMOUNT	
1	Pickup					
2						
3	2-55 gal dr's					
4						
5	15-20 Small dr's					
6						
7	Save all drums					
8						
9	IT is M ^o th.					
10						
11						
12						
Customer's Order No.				Rec'd By		
KEEP THIS SLIP FOR REFERENCE						
SH 528 Rediform						

RECEIVING RECORD

No. <u>336</u>	DATE <u>Oct 14 1975</u>	PURCHASE ORDER NO. OR RETURNED GOODS
RECEIVED FROM <u>PCE</u>		PREPAID
ADDRESS		COLLECT
VIA <u>Cher Stake ØJD</u>		FREIGHT BILL NO.

QUANTITY	ITEM NUMBER	DESCRIPTION
1 <u>2</u>	<u>Drum</u>	<u>Acidic MK</u>
2 <u>13</u>	<u>Cans</u>	<u>(5 gal) Acidic MK</u>
3		
4		
5		
6		
7		
8		
9		
10		
11		
12		
REMARKS: CONDITIONS, ETC.		
NO. PACKS	WEIGHT	RECEIVED BY
		CHECKED BY
		DELIVERED TO

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: R & E Martin, Inc.

Invoice Date	Invoice Number	Invoice Type	Invoice Description	Quantity	Unit Price	Total Value	Counted Towards Ranking
8/15/89	2997		PAB 5912126 WASTE "95" PCE			13.00	Yes
8/15/89	2996		PAB 5912126 WASTE WS			7.00	Yes
8/15/89	2998		PAB 5912126 WASTE XP			6.00	Yes
8/29/89	3006		PAC 1280016 WASTE "95" PCE			2.00	Yes
8/29/89	5865		NA RECLAIMED SOLVENT			10.00	Yes
8/29/89	3005		PAC 1280016 WASTE WS			19.00	Yes
8/29/89	3007		PAC 1280016 WASTE XP			3.00	Yes
8/29/89	5865		NA WASTE XP			10.00	No
9/28/89	3053		PAC 1280366 WASTE "95" PCE			7.00	Yes
9/28/89	5931		NA MIXED CHLORINATED SOLVENT			20.49	Yes
9/28/89	3054		PAC 1280366 WASTE WS (TCE, PCE)			2.00	Yes
9/28/89	5931		NA RECONDITIONED DRUMS			21.00	No
11/6/89	3087		PAC 128056 WASTE WS			4.00	Yes
11/6/89	5974		NA RECLAIM & RETURN WS			0.40	Yes
11/6/89	5974		NA RECLAIM & RETURN 95			2.78	Yes
11/6/89	5974		NA RECONDITIONED DRUMS			7.00	No
11/6/89	5974		NA RECLAIM & RETURN XP			2.33	Yes
11/6/89	3086		PAC 1280576 WASTE XP			3.00	Yes
1/30/90	6845		PAC 1671261 RECONDITIONED DRUMS			9.00	No
1/30/90	6845		PAC 1671261 CHLORINATED SOLVENT-WASTE			7.91	Yes
3/14/90	6881		NA RECONDITIONED DRUMS			7.00	No
3/14/90	6881		NA MIXED CHLORINATED SOLVENT			6.38	Yes
9/24/90	7031		NA RECONDITIONED DRUMS			11.00	No
1/28/91	7124		NA RECLAIMED XP, WS			11.29	No
Total Waste Counted Towards Ranking						116.29	

**Malvern TCE Superfund Site: Comprehensive Transaction Report
for Broker/Transporter Waste**

Run Date: 6/15/00

PRP Name: R & E Martin, Inc.

PRP Type: Transporter

					Quantity	Counted Toward Ranking	Generator Name
9/24/90	7031	NA	PAC 2937152	RECLAIMED REMCLEN 95	9.64	No	Zenith Products Corp.
9/24/90	NA	NA	PAC 2937152	PERCHLORETHYLENE & MINERAL SPIRITS	17.00	Yes	Zenith Products Corp.
1/28/91	0		PAC 2937653	METHYLENE CHLORIDE, TRICHLORETHYLE	7.00	Yes	Iron Bound Heat Treating Co.
1/28/91	NA	3449	PAC 2937701	WASTE TRICHLORETHYLENE, PERCHLORETI	11.00	Yes	Kosempel
4/5/91	NA	NA	PAC 2938176	PERCHLORETHYLENE & PETROLEUM NAPTI	9.00	Yes	Zenith Products Corp.
6/21/91	0		PAC 2938386	XYLENE, PERCHLORETHYLENE, METHYLENI	2.00	Yes	Pepco Manufacturing Co.
6/21/91	NA	NA	PAC 2938655	PERCHLORETHYLENE & PETROLEUM NAPTI	7.00	Yes	Zenith Products Corp.
6/21/91	NA	3553	PAC 2938666	TRICHLOROETHYLENE, PERCHLOROETHYLE	2.00	Yes	Kosempel
Total Waste Counted Towards Ranking					55.00		

R I E MARTIN, INC.



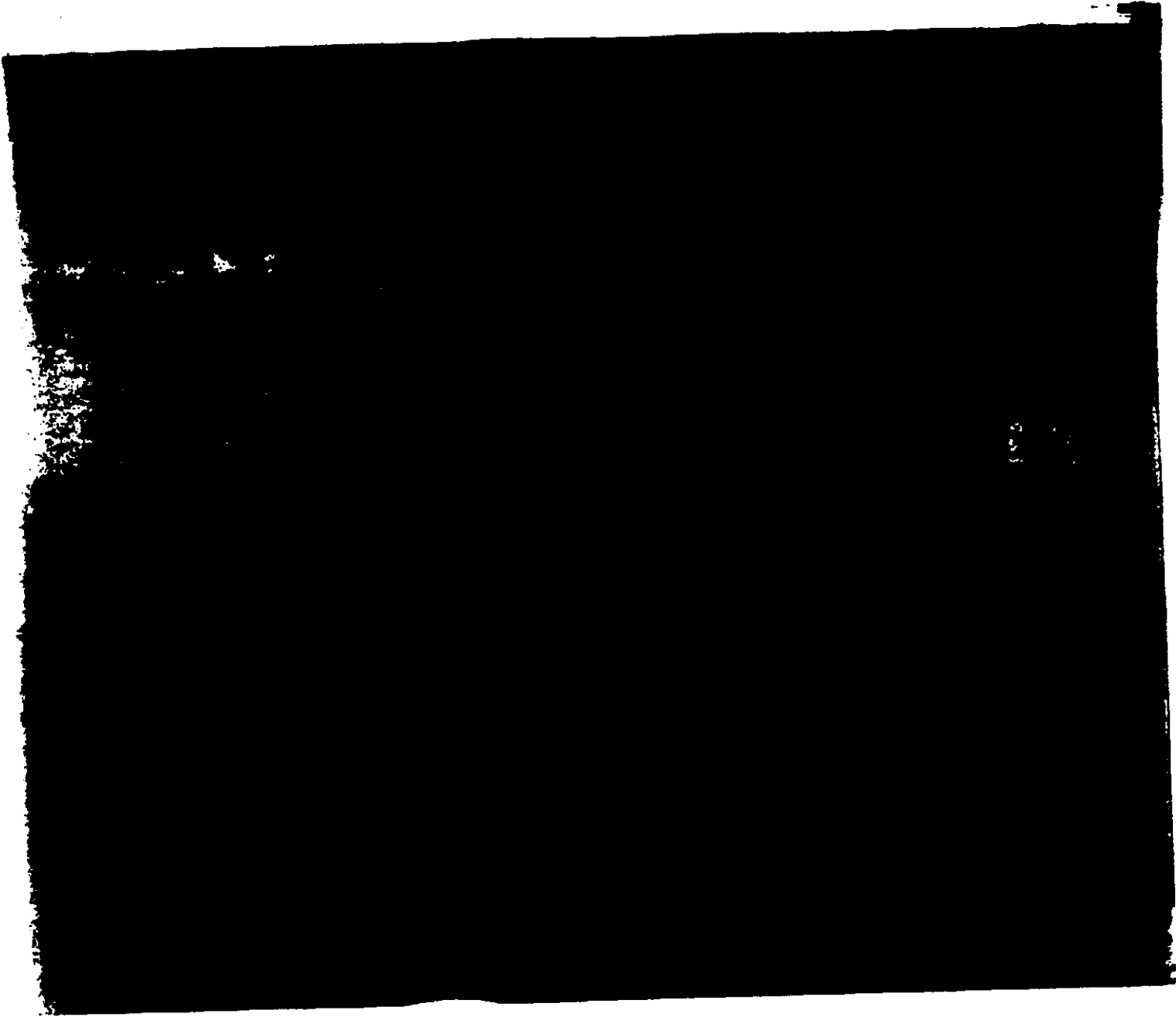
~~BILL RIFE
MARTIN FOR
MURKIN
ANNUAL
\$450.-~~

Bill -
R E MARTIN

6/16/89

1) ANALYSIS FOR } COMPLETION OF MODULE 1
(CITIZENSHIP CLOSURE)

ASD. ⁰⁰



INTERNAL
MANIFEST

3+P
2 ds
CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 844-2986

NO 3007

PAC 1286016

DATE Aug 29 1989

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste XP (MFC, PCB)</u>	<u>3 drums</u>	

R/R

AUTHORIZED SIGNATURE
FOR GENERATOR



WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INTERNAL
MANIFEST

CHEMCLENE CORPORATION

286 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2900

198729016

DATE Aug 29 1987

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste XP (MFC, TCE)</u>	<u>3 drums</u>	

RIR

AUTHORIZED SIGNATURE FOR GENERATOR 

WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INTERNAL
MANIFEST

№ 2998

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2988

Pass 5412126

DATE

8/15/89

GENERATOR

P4E Martin

ADDRESS

WASTE DESCRIPTION	QUANTITY	REMARKS
Waste XP	6	
NLT TCE		

Yield = 165 gm (50%)

AUTHORIZED SIGNATURE
FOR GENERATOR

WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INTERNAL
MANIFEST

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19358

(215) 644-2988

PH541226
8/15/89

GENERATOR

PHE MOTION

DATE

ADDRESS

WASTE DESCRIPTION	QUANTITY	REMARKS
Waste XP	6	
MCT TCE		

Yield = 165 Gall (50%)

AUTHORIZED SIGNATURE
FOR GENERATOR



WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INTERNAL
MANIFEST

No. 2997

CHEMCLENE CORPORATION

250 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

PA55912126

DATE

8/15/89

GENERATOR

MARTIN RIFE

ADDRESS

WASTE DESCRIPTION	QUANTITY	REMARKS
Waste "95"	13	
PCE		

VISUAL = 8 bags = 2 more to run

Rife

AUTHORIZED SIGNATURE
FOR GENERATOR



WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INVENTORY
MANIFEST

CHEMCLENE CORPORATION

Assured

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2988

DATE 8/15/89

GENERATOR MARTIN, R & F

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste "95"</u>	<u>13</u>	
<u>PCE</u>		

YIELD = 8 bags ± 2 more to be used

R & F

AUTHORIZED SIGNATURE
FOR GENERATOR



WHITE - OFFICE; YELLOW - GENERATOR; PINK - INVOICE; GOLD - PLANT

INTERNAL
MANIFEST

No 3006

CHEMCLENE CORPORATION

250 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

PITC1280016

DATE Aug 29 1989

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste 95 (PC)</u>	<u>2 drums</u>	

R/R

AUTHORIZED SIGNATURE FOR GENERATOR 

WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INTERNAL
MANIFEST

CHEMCLENE CORPORATION

255 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2900

PPC 12/20/89

DATE Aug 29 1989

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste 95 (P03)</u>	<u>2 drums</u>	

R/R

AUTHORIZED SIGNATURE FOR GENERATOR 

WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INTERNAL
MANIFEST

№ 3005

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 844-2998

PAC 1780016

DATE Aug 29 1989

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste WS (TCE fire)</u>	<u>19 drums</u>	
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

RIR

AUTHORIZED SIGNATURE FOR GENERATOR 

WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INTERNAL
MANIFEST

CHEMCLENE CORPORATION

250 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2800

NE 3006

PAL 128016

DATE Aug 29 1989

GENERATOR R. E. Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste WS (TCE, PCB)</u>	<u>19 drums</u>	

RIR

AUTHORIZED SIGNATURE
FOR GENERATOR



WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INTERNAL
MANIFEST

NO 2996

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

PAG 5912126

DATE

~~8-15-89~~

GENERATOR

R+E Martin

ADDRESS

WASTE DESCRIPTION

QUANTITY

REMARKS

Waste WS

~~1~~
7

PCE + TCE

25% = 25%

Wt = 385 gm. (two 1?)

AUTHORIZED SIGNATURE
FOR GENERATOR



WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INTERNAL
MANIFEST

CHEMCLENE CORPORATION (P) 5/1/88

250 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2900

DATE

~~8-15-89~~

GENERATOR

R+E MARTIN

ADDRESS

WASTE DESCRIPTION

QUANTITY

REMARKS

Waste WS

~~1~~
7

PCE + TCE

2590 = 25%

Yield = 3850 Gm (100% !?)

AUTHORIZED SIGNATURE
FOR GENERATOR



WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

VOICE

CHEMCLENE CORPORATION
(Solvents, Equipment & Waste Disposal)
208 N. PHOENIXVILLE PIKE • MALVERN, PA 19355-1126
(215) 844-2906

R&E Martin, Inc.
2821 Helen Street
Philadelphia, Pa. 19134

SHIPPED TO

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	QUANTITY	MANIFEST NO.
8/29/89	8/29/89	5865	Verbal	Net 30		
QUANTITY	DESCRIPTION				PRICE	AMOUNT
590 gal.	Reclaimed Solvent				\$2.80/gal.	\$1,650.00
10 drums	Reclaimed XP				18.00/dr	180.00
						\$1,830.00
PAID						
CHECK # 7220						
DATE 10/3/89						
						150.-

CHEMCLENE CORP.

MALVERN, PA. 19355

5865

PHONE (215)

644-2986

Date AUGUST 29 19 89

Sold to R & E MARTIN

Address PHILADELPHIA, PA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER METER RECEIPT

TEMPERATURE	WEIGHT
-------------	--------

YOUR SALE NO.	GALLON READING - FINISH	10ms
---------------	-------------------------	------

**7 DRUMS RECLAIMED 15 AND 3 DRUMS RECLAIMED 12
RETURNED TO MARTIN**

550 Gals. RECLAIMED SOLVENT @ 3/Gal = 1,650.
BY DATE 8/29/89 GALLON READING - START 124

PREVIOUS SALE NO.	GALLON READING - START
-------------------	------------------------

GALLONS DELIVERED 124

PRODUCT	POUNDS	PRICE	TOTAL AMT
PERCHLOROETHYLENE			
TRICHLOROETHYLENE			
METHYLENE CHLORIDE			

X [Signature]
CUSTOMER SIGNATURE AFTER DELIVERY

R. & E. MARTIN

affiliate: RESEARCH LABORATORIES

Industrial Chemicals and Products

Process Engineers

OGESTALL® - POLLUTION CONTROL
FLAME BATTLES - FIRE CONTROL
REM-KLEEN® - CLEANERS
REM-SOL® - SOLUBLE OILS
REM-COOL® - CUTTING OILS
REM-DRAW® - DRAWING OILS



2817-21 HELEN STREET
PHILADELPHIA, PA. 19134
(215) 634-6300

INSPECTION REPORT

VENDOR: Chemclene Corp.

DATE OF INSPECTION: 8-30-89

MATERIAL: Reclaim - 10 drums

INSPECTION RESULTS:

INSPECTOR: [Signature]

REC'D: 8-29-89

<u>Drum #</u>	<u>Material</u>	<u>GALS</u>	<u>TOP Gravity</u>
1	WS	54	1.22
2	WS	54	1.24
3	WS	48	1.00 Reject "A"
4	WS	56	1.00 Reject "B"
5	WS	53	1.20
6	WS	53	1.25
7	WS	54	1.15
8	XP	49	1.00 Reject "C"
9	XP	54	1.11
10	XP	53	1.20

Totals 528 gals

A" = 3 gals WS, 45 gals H₂O
 B" = 44 gals WS, 12 gals H₂O
 C" = 38 gals XP, 11 gals H₂O

528 gals
 less 68 gals H₂O
 460 gals net.

INVOICE

CHEMCLENE CORPORATION
(Solvents, Equipment & Waste Disposal)
258 N. PHOENIXVILLE PIKE • MALVERN, PA 19355-1128
(215) 644-2986

NO. 18923

SHIPPED TO

R & E Martin, Inc.
Helen Street
2821
Philadelphia, Pa. 19134

INVOICE DATE	DATE SHIPPED	OUR ORDER NO	YOUR ORDER NO.	TERMS	SHIPPED VIA	MANIFEST NO	
9/28/89	9/28/89	5931	Verbal	Net 30			
QUANTITY	DESCRIPTION					PRICE	AMOUNT
1,127 gal.	Mixed Solvent Reclaimed & Returned					\$3./gal	\$ 3,381.00
21	Reconditioned drums					12./ea	252.00
	Total.....						\$ 3,633.00
PAID CHECK No <u>7914</u> DATE <u>10/31/89</u>							

THANK YOU

CHEMCLENE CORP.

MALVERN, PA. 19355

5931

PHONE (215)
644-2986

Date SEPT. 28 19 89

Sold to R&E MARTIN

Address PHILADELPHIA, PA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER RECEIPT

TEMPERATURE _____ WEIGHT _____

YOUR SALE NO _____ GALLON READING FINISH _____ 10/111

REPROCESSED & RETURNED TO MARTIN
12 DRUMS WS
8 FULL DRUMS 95 PLUS 1 PARTIAL (27 gals)

PREVIOUS SALE NO _____ GALLON READING START _____

GALLONS DELIVERED **27**

PRODUCT	POUNDS	PRICE	TOTAL AMT
PERCHLORETHYLENE			
TRICHOLORETHYLENE			
METHYLENE CHLORIDE			

X 
CUSTOMER SIGN HERE AFTER DELIVERY

1,127 (over) 10,000;
Selling 10,000;
Requirements —

$$\text{€ } 3.12 / \text{cm} = 3,331.24$$

21 items

$$\text{€ } 12.52 \times 252 =$$

$$3,633.24$$

INVOICE

CHEMCLENE CORPORATION
(Solvents, Equipment & Waste Disposal)
258 N. PHOENIXVILLE PIKE • MALVERN, PA 19355-1128
(215) 844-2988

15923

SHIPPED TO

R & E Martin, Inc.
Helen Street
2321
Philadelphia, Pa. 19134

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	SHIPPER VIA	MANIFEST NO.	
9/28/89	9/28/89	5931	Verbal	Net 30			
QUANTITY	DESCRIPTION					PRICE	AMOUNT
1,127 gal.	Mixed Solvent Reclaimed & Returned					\$3./gal	\$ 3,381.00
21	Reconditioned drums					12./ea	252.00
							\$ 3,633.00

*Nice hot
Trucks*

INTERNAL
MANIFEST

№ 3053

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2988

PTC1280366

DATE Sept 28 1989

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste 95 (P.C.)</u>	<u>7 drums</u>	
XXXXXXXXXX	XXXX	

RIR

AUTHORIZED SIGNATURE
FOR GENERATOR



WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INVOICE
MANIFEST

CHEMCLENE CORPORATION

288 N. PHOENIXVILLE ROAD
MALVERN, PA 19355

(215) 844-2988

PHC 1285 100

DATE Sept 23 1989

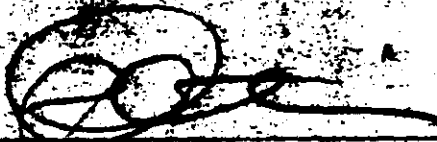
GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>White 95 (Pus)</u>	<u>7 drums</u>	
_____	_____	
_____	_____	
_____	_____	
_____	_____	
_____	_____	
_____	_____	

R/R

AUTHORIZED SIGNATURE
FOR GENERATOR



WHITE—OFFICE, YELLOW—GENERATOR, PINK—INVOICE, GOLD—PLANT

INTERNAL
MANIFEST

№ 3054

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

PC1280366

DATE Sept 28 1989

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste WS (ITE, RIE)</u>	<u>2 drums</u>	
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

R/R

AUTHORIZED SIGNATURE
FOR GENERATOR _____

WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

INVOICE
MANIFEST

CHEMCLINE CORPORATION

288 N. PHOENIXVILLE PIKE
MALVERN, PA. 19358

(215) 644-2800

DATE Sept 28 1987

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste WS (TCE, PCE)</u>	<u>2 drums</u>	

R/R

AUTHORIZED SIGNATURE
FOR GENERATOR

WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

CHEMCLENE CORP.

MALVERN, PA. 19355

5974

PHONE (215)
644-2986

V. 3 23376

Date ~~NOVEMBER 6~~ 19 89

Sold to R & E MARTIN

Address PHILADELPHIA, PA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER ^{METER} RECEIPT

TEMPERATURE _____ WEIGHT _____

YOUR SALE NO. _____ GALLON READING - FINISH _____ 10^{hrs} _____

RECLAIMED & RETURNED FROM MARTIN MATERIAL
XP 2 Full Drums + 1 partial (15 gal)
95 2 Full Drums + 1 partial (43 gal)
WS 1 partial drum 2 gal

PREVIOUS SALE NO. _____ GALLON READING - START _____

GALLONS DELIVERED

PRODUCT	POUNDS	PRICE	TOTAL AMT
PERCHLOROPHENYLENE XP	174 lbs	3 ⁰⁰ / ₁₀₀ / lb	384. ⁰⁰
TRICHLOROETHYLENE 95	153 lbs	3 ⁰⁰ / ₁₀₀ / lb	459. ⁰⁰
METHYLENE CHLORIDE WS	22 lbs	2 ⁰⁰ / ₁₀₀ / lb	66. ⁰⁰
RF-G...	17 lbs		81. ⁰⁰
X			993.⁰⁰

CUSTOMER SIGNATURE AFTER DELIVERY

INVOICE

CHEMCLENE CORPORATION
 (Solvents, Equipment & Waste Disposal)
 258 N. PHOENIXVILLE PIKE • MALVERN, PA 19355-1126
 (215) 644-2986

No 15004

SHIPPED TO

R&E Martin, Inc.
 2821 Helen St.
 Philadelphia, Pa. 19134

INVOICE DATE	DATE SHIPPED	OUR ORDER NO	YOUR ORDER NO	TERMS	SHIPPED VIA	MANIFEST NO	
11/6/89	11/6/89	5974	Verbal	Net 30			
QUANTITY	DESCRIPTION					PRICE	AMOUNT
128 gal.	RE-CLAIMED + RE-FINISHED - XP					\$3./gal	\$ 384.00
153 gal.	95					3./gal	459.00
22 gal.	WS					3./gal	66.00
7 drums	Reconditioned					12./dr	84.00
Total.....							\$ 993.00

*261 gals OK
 42 gal water.*

261 x 3 = 783
 42 + 84
867

THANK YOU

R. & E. MARTIN affiliate: RESEARCH LABORATORIES

Engineering, Diagnostics and Products

Process Engineers

DIGESTION - NO. 10000 CONTROL
 FLAME CALORIMETER - NO. 10000 CONTROL
 REMILKER - NO. 10000
 REMILKING - NO. 10000
 REMILKING - NO. 10000
 REMILKING - NO. 10000



2817-21 HELEN STREET
 PHILADELPHIA PA 19124
 (215) 624-6300

INSPECTION REPORT

VENDOR: Chemlene Corp

DATE OF INSPECTION: 11/10 & 12/4/89

MATERIAL: As Below

INSPECTOR: [Signature]

REC'D: 11-6-89

INSPECTION RESULTS:

<u>Gram #</u>	<u>Material</u>	<u>Top Gr</u>	<u>Status</u>		<u>gals</u>
1	95	1.190	Clear	OK	55
2	95	1.192	Clear	OK	55
3	95	1.154	Clear	OK	43
4	WS	1.180	Clear	OK	22
5	XP	1.172	Clear	OK	55
6	XP	1.000	cdy	water	27 OK (#1)
7	XP	1.000	rust.	water	4 OK (#2)

(#1) 28 gals H₂O

(#2) 14 gals H₂O.

FEDERAL
LAW ENFORCEMENT

No 3086

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

APC 125576

DATE Nov 6 1989

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste XP 1</u>	<u>3 drums</u>	

R/R

AUTHORIZED SIGNATURE FOR GENERATOR 

WHITE—OFFICE. YELLOW—GENERATOR. PINK—INVOICE. GOLD—PLANT

APC 125

INTERNAL
MANIFEST

NO 3086

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

PAC1280576

DATE Nov 6 1987

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste XP f.</u>	<u>3 drums</u>	

RJR

AUTHORIZED SIGNATURE
FOR GENERATOR 

WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

MFC, TCE

INTERNAL
MANIFEST

№ 3087

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

PAC 1280576

DATE Nov 6 1989

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste WS</u>	<u>4 drums</u>	
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

R/R

AUTHORIZED SIGNATURE
FOR GENERATOR 

WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

TGE, ACE

HAZARDOUS
MANIFEST

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE ROAD
MALVERN, PA 19358

(215) 644-2900

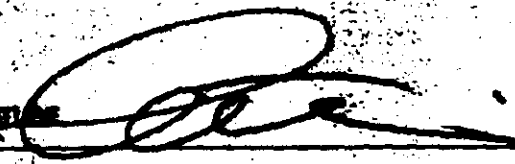
DATE Nov 6 1989

GENERATOR R+E Martin

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste WS</u>	<u>4 drums</u>	

R/R

AUTHORIZED SIGNATURE FOR GENERATOR 

WHITE—OFFICE; YELLOW—GENERATOR; PINK—INVOICE; GOLD—PLANT

TKS, ACE

ORDER DATE
1/30/90

DATE SHIPPED
1/30/90

OUR ORDER NO.
6845

INVOICE NO.
40181

TERMS
Net 30

SHIPPED VIA

SHIPMENT NO.

AMOUNT

11,613.00

1,000.00

10,613.00

R & MARCHI
2821 Holm Street
Philadelphia, PA 19134

WASTE MANAGEMENT CORPORATION
(Specialty Recycling & Waste Disposal)
200 N. Mendenhall Pike • MATVERN, PA 18055-1128
(215) 644-2968

PRICE

CHEMCLENE CORP.

MALVERN, PA. 19355

6845

PHONE (215)

644-2986

Date JANUARY 30 19 90

Sold to R & E MARTIN

Address PHILADELPHIA, PA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER RECEIPT

TEMPERATURE _____ WEIGHT _____

YOUR SALE NO. _____ GALLON READING FINISH _____ 10ms _____

MATERIAL RECLAIMED & RETURNED TO R & E MARTIN
1 DRUM XP (55 gal) 1 DRUM 95 (55 gal)
6 DRUMS WS (5 - 55 gal AND 1 - 50 gal)

PREVIOUS SALE NO. _____ GALLON READING START _____

GALLONS DELIVERED \rightarrow 9 1/2

PRODUCT	POUNDS	PRICE	TOTAL AMT
PERCHLORETHYLENE			
TRICHOLORETHYLENE			
METHYLENE CHLORIDE			

X R. E. Martin
CUSTOMER SIGN HERE AFTER DELIVERY

רחל אהרן
 חברה להשקעות
 חשבונית מס' 130/2018
 תאריך: 12/10/18

סך הכל: 106.
 1,413 ₪

INVOICE

CHEMCLENE CORPORATION
(Solvents, Equipment & Waste Disposal)
258 N. PHOENIXVILLE PIKE • MALVERN, PA 19355-1126
(215) 644-2986

No 16150

SHIPPED TO

R & E Martin
3921 Helan Street
Philadelphia, Pa. 19134

INVOICE DATE	DATE SHIPPED	OUR ORDER NO	YOUR ORDER NO	TERMS	SHIPPED VIA	MANIFEST NO	
1/30/90	1/30/90	5845	Verbal	Net 30			
QUANTITY	DESCRIPTION				PRICE	AMOUNT	
435 gal.	Martin waste mixed chlorinated solvent reclaimed & returned				\$3./gal	\$1,305.00	
9	Reconditioned drums				12./dr	108.00	
	Total.....					\$1,413.00	

THANK YOU

PRICE

BERKLENE CORPORATION

1000 Market Street
PHILADELPHIA, PA 19103-1100
(215) 644-2900

R&B Martin, Inc.
2821 Helen St.
Philadelphia, Pa. 19134

ORDER DATE	DATE SHIPPED	ORDER NUMBER	QUANTITY	UNIT PRICE	TOTAL	AMOUNT
3/4/90	3/16/90	620		1.00	620.00	620.00
R&B Martin, Inc.						
2821 Helen St.						
Philadelphia, Pa. 19134						

CHEMCLENE CORP.

MALVERN, PA. 19355

6881

PHONE (215)

644-2986

6881

Date MARCH 14, 19 90

Sold to R & E MARLIN

Address PHILADELPHIA, PA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER RECEIPT

TEMPERATURE _____ WEIGHT _____

YOUR SALE NO. _____ GALLON READING - FINISH _____ DRUM

4 DRUMS RECLAIMED WS (3 DR 55 GAL, 1 DR 50 GAL)
2 DRUMS RECLAIMED 95 (1 DR 55 GAL, 1 DR 26 GAL)
1 DRUM RECLAIMED XP (55 GAL)

PREVIOUS SALE NO. _____ GALLON READING - START _____

GALLONS DELIVERED

PRODUCT	POUNDS	PRICE	TOTAL AMT
PERCLORETHYLENE	351 lbs	3.10	1,092.10
TRICHLOROETHYLENE	200 lbs	5.25	1,050.00
METHYLENE CHLORIDE	70 lbs	12.00	840.00
			1,157.10

X CUSTOMER SIGNATURE AND DELIVERY

INVOICE

CHEMCLENE CORPORATION
(Solvents, Equipment & Waste Disposal)
258 N. PHOENIXVILLE PIKE • MALVERN, PA 19355-1128
(215) 644-2986

№ 16227

SHIPPED TO

R&E Martin, Inc.
2821 Helen St.
Philadelphia, Pa. 19134

INVOICE DATE	DATE SHIPPED	OUR ORDER NO	YOUR ORDER NO	TERMS	SHIPPED VIA	MANIFEST NO	
3/14/90	3/14/90	6881	Verbal	Net 30			
QUANTITY	DESCRIPTION					PRICE	AMOUNT
351 gal.	Mixed Chlorinated Solvent Reclaimed					\$3./gal	\$1,053.00
7 drums	Reconditioned <i>ARS.</i>					12./dr	34.00
	Total.....						\$1,137.00

THANK YOU

CHEMCLENE CORPORATION

(Solvents, Equipment & Waste Disposal)

150 N. PHOENIXVILLE PIKE • MALVERN, PA 19355-1121

(215) 844-2988

R & E Martin, Inc.
P. O. Box 4701
Philadelphia, PA 19134

SHIPPED TO

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	QUANTITY	MANIFEST NO.
1/5/91	4/5/91	7171	Verbal	Net 30	OT	PAC2938176
QUANTITY	DESCRIPTION				PRICE	AMOUNT
55 gal	Reclaimed Remklean 95 from Smith Products waste				\$6.00	\$1,420.00
	Reconditioned drums				12.00	84.00
						13.50
						13.50
						9.30

INTERNAL
MANIFEST

NO 3493

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

DAC2938176

DATE March 4, 1978

GENERATOR Zenith Products

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Perchloroethylene + Petroleum Naptha</u>	<u>9 drums</u>	
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

PIA Superfund tax
1.50/oz

AUTHORIZED SIGNATURE
FOR GENERATOR

K. Orcutt

WHITE—OFFICE. YELLOW—GENERATOR. PINK—INVOICE. GOLD—PLANT

CHEMCLENE CORP.

MALVERN, PA. 19355

PHONE (215)
644-2986

7171

Date APRIL 5 19 91

Sold to R. & R. MARTIN

Address PHILADELPHIA, PA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER METER RECEIPT

TEMPERATURE

WEIGHT

YOUR SALE NO

GALLON READING FINISH

10mm

**7 DRUMS RECLAIMED PERCHLOROETHYLENE CONTAINING
355 GALS. (SIX DRUMS WITH 55 GALS. & ONE DRUM
WITH 25 GALS.)**

PREVIOUS SALE NO

GALLON READING START

GALLONS DELIVERED **4**

PRODUCT	POUNDS	PRICE	TOTAL AMT
PERCHLOROETHYLENE			
TRICHLOROETHYLENE			
METHYLENE CHLORIDE			

X

CUSTOMER SIGNATURE AFTER DELIVERY

INVOICE

CHEMCLENE CORPORATION
(Solvents, Equipment & Waste Disposal)
258 N. PHOENIXVILLE PIKE • MALVERN, PA 19355-1128
(215) 644-2986

16812

SHIPPED TO

R & E Martin, Inc.
2821 Helen Street
Philadelphia, PA 19134

INVOICE DATE	DATE SHIPPED	OUR ORDER NO	YOUR ORDER NO	TERMS	SHIPPED VIA	MANIFEST NO	
1/28/91	1/28/91	7124	Verbal	Net 30	OT		
QUANTITY	DESCRIPTION					PRICE	AMOUNT
199 gal	Reclaimed XP					\$4.00	\$ 796.00
422 gal	Reclaimed WS					4.00	1,688.00
12	Reconditioned drums					12.00	144.00
	PA superfund tax						-27.00
	Total due.....						\$2,655.00

Jan 1988

THANK YOU

INTERNAL
MAN. FILE

NO 3449

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

MAC 2937701

DATE January 7 1991

GENERATOR Kosempel Manufacturing Co

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Trichloroethylene,</u>	<u>11</u>	<u>drums</u>
<u>Perchloroethylene, Xylene*</u>		
<u>Petroleum Naptha</u>		

AUTHORIZED SIGNATURE
FOR GENERATOR

John P. Aichon

WHITE—OFFICE, YELLOW—GENERATOR, PINK—INVOICE, GOLD—PLANT

INTERNAL
MANIFEST

NO 3414

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

MAC 0437653

DATE Nov 14 1990

GENERATOR Iron Bound Heat Treating

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Methylene Chloride</u>	<u>7 drums</u>	
<u>Trichloroethylene + Petroleum Naptha</u>		<u>Low Sp6r</u>

AUTHORIZED SIGNATURE FOR GENERATOR Steph Bars

WHITE—OFFICE. YELLOW—GENERATOR. PINK—INVOICE. GOLD—PLANT

CHEMCLENE CORP.

MALVERN, PA. 19355

PHONE (215)
644-2986

7124

Date JANUARY 28 19 91

Sold to R & E MARTIN CO.

Address PHILADELPHIA, PA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER RECEIPT

TEMPERATURE		WEIGHT	
YOUR SALE NO	GALLON READING	FINISH	10ths
199 GALS RECLAIMED 17 IN FOUR DRUMS (54, 55, 54, 36 GALS)			
422 GALS RECLAIMED 18 IN eight DRUMS (55, 55, 52, 54, 54, 53, 53, 47 GALS)			
PREVIOUS SALE NO	GALLON READING - START		
GALLONS DELIVERED <i>[Signature]</i>			
PRODUCT	QUANTITY	PRICE	TOTAL AMT
PERCHLORETHYLENE			
TRICHOLORETHYLENE			
METHYLENE CHLORIDE			

X
CUSTOMER SIGN HERE AFTER DELIVERY

CHEMCLENE CORPORATION

(Solvents, Equipment & Waste Disposal)

258 N. PHOENIXVILLE PIKE • MALVERN, PA 19355-1128
(215) 644-2966

SHIPPED TO

R. & E. Martin, Inc.
P. O. Box 4701
Philadelphia, PA 19134

INVOICE DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	QUANTITY	DESCRIPTION	UNIT PRICE	AMOUNT
6/25/91	6/21/91	7231	Verbal				
					Reclaimed 1,1,1-Trichloroethane	1500	\$1,368.00
					Reclaimed Benzene 55 gal		1,100.00
					Reconditioned Drum		
					Superfund Tax (2.5%)		
					Copy 2 from		
							\$2,763.15

INTERNAL
MANIFEST

NO 3545

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

PAC 293855

GENERATOR Zenith Products Inc DATE May 22 1991

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Perchloroethylene + Petroleum Naptha</u>	<u>7 drums</u>	

RJR - BILL MARTIN

AUTHORIZED SIGNATURE FOR GENERATOR 

WHITE—OFFICE, YELLOW—GENERATOR, PINK—INVOICE, GOLD—PLANT

INTERNAL
USE ONLY

NO 3514

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

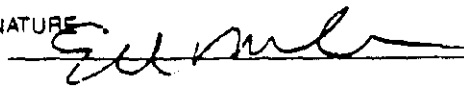
PA 2935350

DATE April 12, 1991

GENERATOR Pepco Manufacturing Co

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Waste Xylene, Perchloroethylene</u> <u>+ Methylene Chloride</u>	<u>2 drums</u>	
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

AUTHORIZED SIGNATURE
FOR GENERATOR 

WHITE—OFFICE. YELLOW—GENERATOR. PINK—INVOICE. GOLD—PLANT

INTERNAL
USE ONLY

NO 3553

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

(215) 644-2986

PAC 295866

DATE June 12 1991

GENERATOR Kosempel Mfg Co

ADDRESS _____

WASTE DESCRIPTION	QUANTITY	REMARKS
Waste Trichlorethylene,	2 drums.	
Perchlorethylene, Xylene		
+ Mineral Spirits		

AUTHORIZED SIGNATURE FOR GENERATOR *John R. ...*

WHITE—OFFICE, YELLOW—GENERATOR, PINK—INVOICE, GOLD—PLANT

CHEMCLENE CORP.

MALVERN, PA. 19355

7231

PHONE (215)
644-2986

Date JUNE 23 1994

Sold to R. B. MARTIN

Address PHILADELPHIA, PA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER METER RECEIPT

TEMPERATURE	WEIGHT
-------------	--------

YOUR SALE NO	GALLON READING	FINISH	107ms
--------------	----------------	--------	-------

**SIX 95 GALS INHIBITED 1,1,1 TRICHLOROETHYLENE
899 GALS UNINHIBITED SOLVENT 95 IN SIX INHIB
5 INHIB OF 95 GALS & 1 INHIB OF 24 GALS.**

PREVIOUS SALE NO	GALLON READING	START
------------------	----------------	-------

GALLONS DELIVERED **6**

PRODUCT	POUNDS	PRICE	TOTAL AMT
PERCHLORETHYLENE			
TRICHLOROETHYLENE			
METHYLENE CHLORIDE			

X 
CUSTOMER SIGNATURE AND DELIVERY

INDICE

CHEMCLENE CORPORATION
(Solvents, Equipment & Waste Disposal)

258 N. PHOENIXVILLE PIKE • MALVERN, PA 19355-1128
(215) 644-2966

1512

SHIPPED TO

R & E Martin, Inc.
2821 Helen Street
Philadelphia, PA 19134

DATE	DATE SHIPPED	OUR ORDER NO.	YOUR ORDER NO.	TERMS	SHIPPED VIA	MANIFEST NO.	
9/26/90	9/24/90	7031	Sanith	Net 30	CP	MAC2937152	
QUANTITY	DESCRIPTION					PRICE	AMOUNT
1	Reclaimed Remclene 95 (from Sanith 8/8/90)					64.00	64,120.00
	Reconditioned drums					1.00	15.00
	PA Superfund Tax on drums					2.50	2.50
							2,277.50

2,277.50

PA

INTERNAL
MAIL REST

V. 21372

NO 3345

CHEMCLENE CORPORATION

258 N. PHOENIXVILLE PIKE
MALVERN, PA 19355

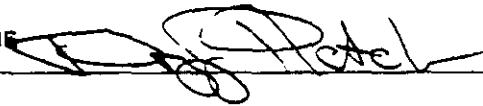
(215) 644-2986

PA02937152

GENERATOR Zenith Prod. DATE 08/08/90
ADDRESS Astou

WASTE DESCRIPTION	QUANTITY	REMARKS
<u>Remclone 95</u>	<u>17005.</u>	

AUTHORIZED SIGNATURE
FOR GENERATOR



WHITE—OFFICE. YELLOW—GENERATOR. PINK—INVOICE. GOLD—PLANT

CHEMCLENE CORP.

MALVERN, PA. 19355

7031

PHONE (215)
644-2986

Date SEPTEMBER 24 19 90

Sold to R.E. MARTIN CO.

Address PHILADELPHIA, PA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER METER RECEIPT

TEMPERATURE	WEIGHT
-------------	--------

YOUR SALE NO	GALLON READING	FINISH	10ths
11 DRUMS RECLAIMED 95 (584 GALS)			
7 DRUMS AT 55 GAL		1 DRUM AT 38 GAL	
2 DRUMS AT 54 GAL			
1 DRUM AT 53 GAL			
PREVIOUS SALE NO	GALLON READING	START	

GALLONS DELIVERED **95**

PRODUCT	POUNDS	PRICE	TOTAL AMT
PERCHLORETHYLENE			
TRICHOLORETHYLENE			
METHYLENE CHLORIDE			

X *[Signature]*
CUSTOMER SIGN HERE AFTER DELIVERY

Malvern TCE Superfund Site: Comprehensive Transaction Report

Run Date: 6/15/00

PRP Name: Technitrol

[REDACTED]						
1/30/68	8590	9289	NA	WASTE 1,1,1 TRICHLOROETHANE	10.00	Yes
1/30/68	8590	9289	NA	WASTE 1,1,1 TRICHLOROETHANE	13.18	No
Total Waste Counted Towards Ranking					10.00	

1952 EAST ALLEGHENY AVE.
PHILA., PA. 19134

FROM - TECHNITROL, INC.
1952 EAST ALLEGHENY AVE. PHILA., PA. 19134

DATE ENTERED	GOVERNMENT CONTRACT NO.	TERMS
		NET 30

POSTMASTER: THIS PARCEL MAY BE OPENED FOR POSTAL INSPECTION IF NECESSARY. RETURN POSTAGE GUARANTEED.

S
O
L
O

PHILLIPS & JACOBS
417 N 8th STREET
PHILADELPHIA PENNA

YOUR ORDER NUMBER

S
H
I
P
T
O

YOUR ORDER NUMBER

DATE SHIPPED	SHIPPED VIA	INVOICE DATE	INVOICE NUMBER	OUR ORDER NUMBER	REPR.
	VENDOR'S PICK UP			H-9734	9-120

ITEM	QTY. ORDERED	QTY. SHIPPED	BACK ORDERED	DESCRIPTION
1		10 drums		DIRTY CHLOROTHENE TO BE RECLAIMED <i>H. J. Seaman</i> <i>Returned</i> <i>In Feb 68</i>

THE GOODS OR SERVICES COVERED BY THIS INVOICE HAVE BEEN MANUFACTURED OR PERFORMED IN COMPLIANCE WITH SECTIONS 6, 7, AND 12 OF THE FAIR LABOR STANDARDS ACT OF 1936, AS AMENDED, AND OF REGULATIONS AND ORDERS OF THE U.S. DEPT. OF LABOR ISSUED UNDER SECTION 14 THEREOF.

PACKING LIST

CHEMCLENE CORP.

MALVERN, PA. 19355

8590

PHONE (215)
644-2986

P. & J. ORDER #84681

YOUR ORDER #H-8059

Date 29 JANUARY 1968

Sold to TECHNITROL

Address 1952 E. ALLEGHENY AV. PHILA.

AUTOMATICALLY
PRINTED



TO INSURE YOU
OF ACCURACY

MASTER METER RECEIPT

OPERATOR	Cash	TRUCK NO.	TIME
HBK	Charge		XX
YOUR SALE NO.	X STAKE		10ms

TEN DRUMS RECLAIMED 1-1-1 TRICHLORO
ETHANE
IN NON RETURNABLE DRUMS

PREVIOUS SALE NO.	GALLON READING - START
GALLONS DELIVERED	

PRODUCT	QTY.	PRICE	TOTAL AMT.
	6,040.16	E/12	

RECEIVED QUANTITY SHOWN ABOVE	RECEIVED PAYMENT
	\$ 513 40

Anthony Beck
CUSTOMER SIGN HERE AFTER DELIVERY

FOR THE COMPANY

11/18/51

CHEMCLENE CORPORATION

MALVERN, PENNSYLVANIA

Date of Invoice

Your Order Number

Terms

SALES REPRESENTATIVE

SALES OFFICE

SALES OFFICE

PERCHLOROETHYLENE

TRICHLOROETHYLENE

METHYLENE CHLORIDE

1,1,1-TRICHLOROETHANE

1,1,1-TRICHLOROETHANE

60000000

PAID
CHECKING
DATE

Attachment G



Office of Enforcement and Compliance Assurance
INFORMATION SHEET

U.S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and State environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. Many public libraries provide access to the Internet at minimal or no cost.

EPA's Small Business Home Page (<http://www.epa.gov/sbo>) is a good place to start because it links with many other related websites. Other useful websites include:

EPA's Home Page
<http://www.epa.gov>

Small Business Assistance Programs
<http://www.epa.gov/ttn/sbap>

Compliance Assistance Home Page
<http://www.epa.gov/oeca/oc>

Office of Site Remediation Enforcement
<http://www.epa.gov/oeca/osre>

Hotlines, Helplines and Clearinghouses

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance on environmental requirements.

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs. Key hotlines include:

EPA's Small Business Ombudsman
(800) 368-5888

Hazardous Waste/Underground Tanks/
Superfund
(800) 424-9346

National Response Center
(to report oil and hazardous substance spills)
(800) 424-8802

Toxics Substances and Asbestos Information
(202) 554-1404

Safe Drinking Water
(800) 426-4791

Stratospheric Ozone and Refrigerants
Information
(800) 296-1996

Clean Air Technical Center
(919) 541-0800

Wetlands Hotline
(800) 832-7828

Continued on back

U.S. EPA SMALL BUSINESS RESOURCES

Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established national Compliance Assistance Centers that provide Internet and "faxback" assistance services for several industries with many small businesses. The following Compliance Assistance Centers can be accessed by calling the phone numbers below and at their respective websites:

Metal Finishing

(1-800-AT-NMFRC or www.nmfrc.org)

Printing

(1-888-USPNEAC or www.pneac.org)

Automotive Service and Repair

(1-888-GRN-LINK or www.ccar-greenlink.org)

Agriculture

(1-888-663-2155 or www.epa.gov/oeca/ag)

Printed Wiring Board Manufacturing

(1-734-995-4911 or www.pwbrc.org)

The Chemical Industry

(1-800-672-6048 or www.chemalliance.org)

The Transportation Industry

(1-888-459-0656 or www.transource.org)

The Paints and Coatings Center

(1-800-286-6372 or www.paintcenter.org)

State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information. For assistance in reaching state agencies, call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-enviroweb.org/state.html>.

Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses: The Audit Policy (<http://www.epa.gov/oeca/auditpol.html>) and the Small Business Policy (<http://www.epa.gov/oeca/>

[smbusi.html](#)). These do not apply if an enforcement action has already been initiated.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your Standard Industrial Code (SIC) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.