

87710-00002

RECEIVED  
JUL 03 1989

MCKENNA, STORER, ROWE, WHITE & FARRUG  
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

ATTORNEYS AT LAW  
200 NORTH LASALLE STREET  
CHICAGO, ILLINOIS 60601-1083  
(312) 558-3900  
FACSIMILE: (312) 558-8348

WHEATON, ILLINOIS OFFICE  
2100 MANCHESTER, UNIT 400  
60187-4558  
(312) 462-8181

WAUKEGAN, ILLINOIS OFFICE  
325 WEST WASHINGTON STREET  
60085-5613  
(312) 249-1620

MATTHEWS, DEAN, MCKENNA & STORER  
FIRST AMERICAN BANK BLDG., SUITE 210  
1851 WEST GALENA BOULEVARD  
AURORA, ILLINOIS 60506  
(312) 892-7021

SUPERFUND PROGRAM  
MANAGEMENT BRANCH

MICHAEL J. MAHER

June 27, 1989

ALSO ADMITTED FLORIDA BAR

WRITERS DIRECT DIAL NO.  
558-3941  
IN REPLY REFER TO FILE

NO.  
35586M-142-48-171

United States Environmental  
Protection Agency, Region V  
Waste Management Division  
230 S. Dearborn Street  
Chicago, IL 60604


ATTENTION: Ms. Carolyn Bohlen (5HSM-12),

Dear Ms. Bohlen:

Enclosed please find Mr. William Shulski's answers to questions pro-  
pounded pursuant to 42 U.S.C. §9604(e) in Ms. Mary Gade's letter  
of June 6, 1989. These answers are based upon Mr. Shulski's best  
current recollection of events during the time period set forth in  
your question.

As you know via your earlier video taped interview with Mr. Shulski,  
he is in his golden years and has been retired for over a decade.  
If any of the enclosed answers are inconsistent with Mr. Shulski's  
earlier statements I would be happy to discuss or clarify this. Please  
contact me at the above address and phone number.

Nonetheless, the answers tendered are Mr. Shulski's best present  
recollection after being questioned by myself and another lawyer  
in our Waukegan offices and after discussions with his wife and friends.

Very truly yours,  
  
Michael J. Maher

MJM/tmm  
Enclosures

**INFORMATION PROVIDED BY WILLIAM SHULSKI  
IN RESPONSE TO U.S. EPA REQUEST FOR INFORMATION  
DATED JUNE 6, 1989**

---

TO: Ms. Carolyn D. Bohlen  
(5HSM-12)  
Waste Management Division  
U.S. EPA - Region V  
230 S. Dearborn Street  
Chicago, Illinois 60604

The following information is provided in response to questions 1 through 7 contained in a written request dated June 6, 1989 based on my best present recollection:

1. I transported materials from Johnson Motors Division, Outboard Marine Corporation in Waukegan, Illinois to a landfill site located in Waukegan known to me as "National Disposal". Based on my recollection of the location of the site as compared with the definition of "Site" in the Request for Information, I believe it to be the same general area. In addition to me, Jesse Franco, now deceased, a part-time driver for my company, also transported materials to the same site in the same approximate time frame. In addition, an unidentified driver for Johnson Motors transported materials from Johnson Motors to the same landfill site on occasion.
2.
  - a. I do not specifically recall the exact dates but believe I stopped transporting materials from Johnson Motors Division to the site sometime in late 1968. It is possible, however unlikely, that I was still transporting materials from Johnson Motors Division to the site in early 1969.
  - b. For an initial period of time prior to the relevant time period as set forth in your question, I delivered approximately 5 garbage truck loads per week (approximately 13 cubic yards each) to the site on average. Later, after a compactor was installed, I probably transported approximately 3 compactor containers (approximately 20 cubic yards each) per week to the site on average and 2-3 garbage truck loads. This amount would vary from time to time and I do not have any specific recollection of amounts nor of dates or time periods.
  - c. Initially, the small garbage truck was filled at the main plant, Plant 2 and the corporate office by emptying 1½ yard garbage containers. Later, containers were picked up in Plant 2 near the dock and the garbage truck only picked up from the main plant.
  - d. Attached as Exhibit A is a hand drawn sketch of the Johnson Motors Division facility to the best of my present recollection. Also attached as Exhibit B is a hand drawn sketch of the site I knew as "National Disposal" where I transported materials from Johnson Motors. I have no recollection of picking up barrels of liquid waste unless an occasional barrel was mixed in with other refuse.

e. Does not apply.

f. I was directed by Johnson Motors Division employees (including J. G. Kohler, Director of Purchasing) to transport the materials to the National Disposal site.

g. Paper, cardboard, and metal scrap were salvaged by me and sold to various scrap purchasers rather than being disposed of at the landfill; in addition, when I stopped transporting to the site, I began taking refuse to the City of Kenosha dump site.

h. See my answer to g above. In addition, prior to beginning trash pickup at Johnson Motors in 1965, I had picked up paper and scrap cardboard for a number of years which was sold to various purchasers.

- 3. I do not recall any specific information regarding insurance policies during the relevant time period of the question. I do not possess any copies of policies.
- 4. None.
- 5. None; the business was sold by me in approximately 1971.
- 6. Johnson Motors Division of Outboard Marine Corporation may have additional information with respect to the questions contained herein as well as documentation requested.
- 7. See my answer to 6 above.

The above information is true and accurate to the best of my knowledge and belief; I have conducted a diligent search for documents requested.

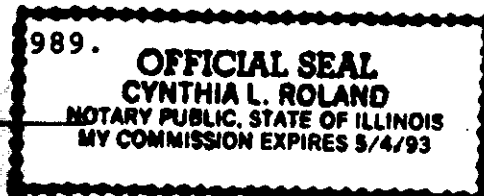
  
 WILLIAM SHULSKI

STATE OF ILLINOIS    )  
                                   ) ss.  
 COUNTY OF LAKE        )

On the 27th day of June, 1989, before me personally appeared WILLIAM SHULSKI, to me known to be the person named herein and who executed the foregoing document.

Subscribed and Sworn to before me

this 27th day of June,  
Cynthia Roland  
 NOTARY PUBLIC



JOHNICOTT MOTORS

MAIN PLANT

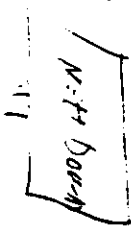
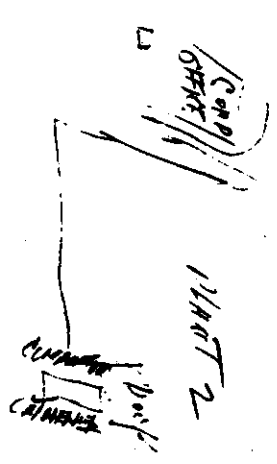
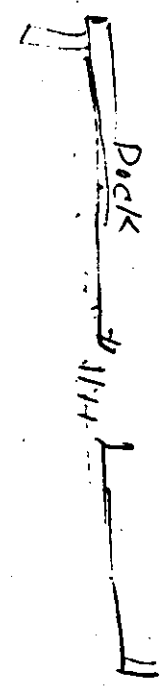
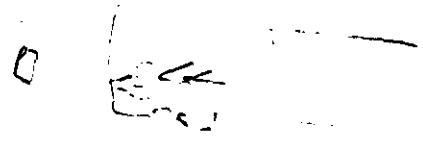


Exhibit A

W  
C  
C

SAT



1000000000