



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF:

December 20, 2002

Jones, Day, Reavis & Pogue
Attn: Heidi Hughes Bumpers
901 Lakeside Ave.
Cleveland, OH 44114-1190
(re: Bridgestone-Firestone)

Dear Sir or Madam:

As you know, the company you represent, **Bridgestone-Firestone**, has been identified by U.S. EPA as a potentially responsible party (PRP) at the Chemical Recovery Systems Site (CRS Site) in Elyria, Ohio. This letter is being sent to offer you an opportunity to enter into a *de minimis* settlement with the United States to resolve your alleged liability under the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) for all past response costs incurred by the United States at the CRS Site and for anticipated future response costs which the United States expects it may incur at that Site. A copy of the Administrative Order on Consent (Consent Order) which will express the agreements of the settling parties is enclosed with this letter. The enclosed Consent Order contains provisions for contribution protection and a covenant not to sue. The enclosed Consent Order, when fully executed, with the signature pages of all settling PRPs and the signature of the Superfund Division Director, will be forwarded to U.S. Department of Justice for approval, and notice of the terms of the settlement will be published in the Federal Register. After this notice, and consideration of comments received, the terms of the Order will become final. U.S. EPA is prepared to settle its claims against you for **\$20,700.00**.

VOLUMETRIC RANKING

Previously, U.S. EPA has sent you a copy of a revised volumetric ranking compiled by U.S. EPA for this Site. U.S. EPA has already given all PRPs several opportunities to question the process by which the volumetric ranking was reached or the specific quantity attributed to individual PRPs by that ranking. If **Bridgestone-Firestone** has any additional information to provide or believes that the volume attributed to **Bridgestone-Firestone** is in error, you may request a waste quantity review by U.S. EPA. **The deadline to apply for a waste quantity review is January 24, 2003.** U.S. EPA will not consider any requests for a waste quantity review submitted after that date.

CHECK NUMBER **730590** TOTALS **20,700.00** **0.00** **20,700.00**

BRIDGESTONE / FIRESTONE NORTH AMERICAN TIRE, LLC

ACCOUNTS PAYABLE DISBURSEMENTS
35 MARRIOTT DRIVE
NASHVILLE, TN 37214

Please include this vendor number on all invoices --> 535772

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

BRIDGESTONE / FIRESTONE NORTH AMERICAN TIRE, LLC

ACCOUNTS PAYABLE DISBURSEMENTS
35 MARRIOTT DRIVE
NASHVILLE, TN 37214

PAY ***20,700 Dollars and 00 cents ***

CHECK NUMBER
730590

CHECK DATE
10-20-03

ORDER OF
EPA HAZARDOUS SUBSTANCE SUPERFUND
REGION 5
77 W JACKSON BLVD
CHICAGO IL 60604-3590

*****20,700.00 USD

Richard E. Savelli
Linda H. Morris

Bank One, N.A.
Chicago Illinois



U.S. ENVIRONMENTAL
PROTECTION AGENCY

OCT 23 2003

OFFICE OF REGIONAL
COUNSEL

VII. PAYMENT

15. Within 30 days of the effective date of this Consent Order, each Respondent shall pay to the EPA Hazardous Substance Superfund the amount set forth in Schedule C, attached. [Schedule C will be attached to the copy of this Order which is signed by U.S. EPA's Superfund Division Director, and it will contain the names and payments of all parties who sign this Order. The payment assigned to your company will be the dollar figure given in the cover letter sent with this Order].

16. Each Respondent's payment includes an amount for: a) past response costs incurred at or in connection with the Site; b) projected future response costs to be incurred at or in connection with the Site; and c) a premium to cover the 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, will exceed the estimated total response costs upon which Respondents' payments are based.

17. 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 0521, and the EPA docket number for this action, and shall be sent to:

Chemical Recovery Systems

U.S. Environmental Protection Agency, Region 5
Superfund Accounting
P.O. Box 70753
Chicago, Illinois 60673

Region 5

Ohio Docket No. V-W-03-C-750.

18. At the time of payment, each Respondent shall send notice that such payment has been made to:

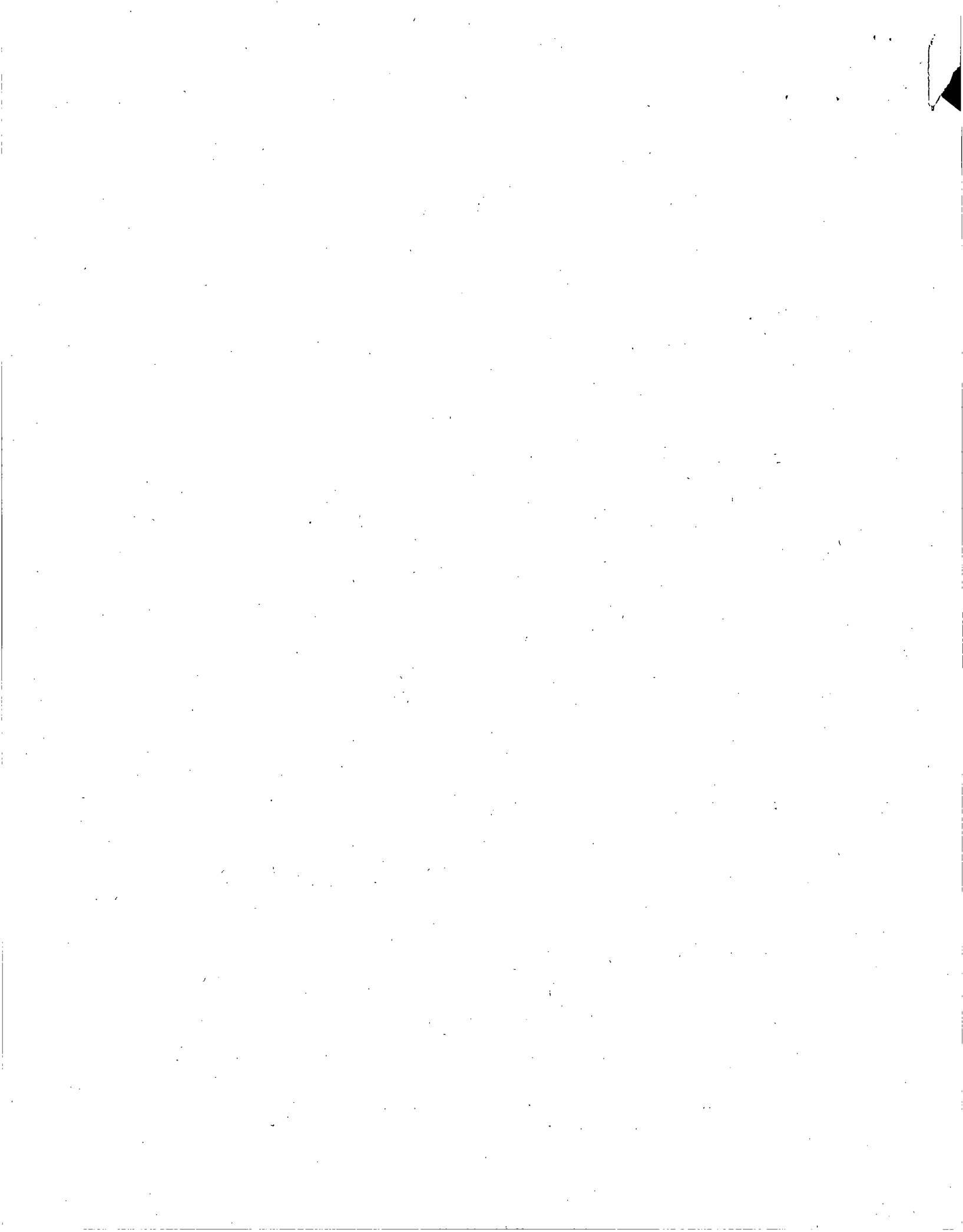
Thomas C. Nash C-14J
U.S. EPA, Region 5
77 West Jackson Blvd.
Chicago, IL 60604

copy of check attached

(just send a \$20,700.00 copy)
624313
2188
↓ send copy to me for our records.

VIII. FAILURE TO MAKE PAYMENT

19. If any Respondent fails to make full payment within the time required by Paragraph 15, that Respondent shall pay Interest on the unpaid balance. In addition, if any Respondent fails to



SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Jones, Day, Reavis & Pogue
 Attn: Heidi Hughes Bumpers
 901 Lakeside Ave.
 Cleveland, OH 44114-1190
 (re: Bridgestone-Firestone)

2. Article Number

(Transfer from service label)

7001 0320 0006 0176 5475

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) B. Date of Delivery

Jones Day 12 23 02

C. Signature

X J. Martin Agent AddresseeD. Is delivery address different from item 1? Yes
If YES, enter delivery address below: No

3. Service Type

- Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee)

 Yes

UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

U.S. EPA Region 5
Deena Sheppard-Johnson, SR-6J
Remedial Enforcement Support Sect.
77 West Jackson Blvd.
Chicago IL 60604 (re: CRS)