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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

November 22, 2004

REPLY TO THE ATTENTION OF:

VIA FEDERAL EXPRESS

RRG Clayton Chemical Site (soil removal)

EPA Region 5 Records Ctr.
285191

Mr. Hugh Grant, President
Monsanto Company
800 N. Lindbergh Blvd.
St. Louis, MO 63167

Re: Clayton Chemical Site General Notice of Potential Liability letter.

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site, and is planning to spend public funds to control and investigate these releases. This action will be taken by U.S. EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9601 et seq., (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, stat. 1613 (1986) (SARA), unless U.S. EPA determines that such action will be done properly by a responsible party. Responsible parties under CERCLA include the current and former owners and operators, and persons who generated the hazardous substances or were involved in transport, treatment, or disposal of them at the Site. Under Section 107(a) of CERCLA, where the Agency uses public funds to achieve the cleanup of the hazardous substances, responsible parties are liable for all costs associated with the removal or remedial action and all other necessary costs incurred in cleaning up the Site, including investigation, planning and enforcement.

The U.S. EPA is currently planning to conduct the following actions at the above referenced Site:

1. Develop and implement a site health and safety plan;

2. Provide security for the site;

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3. Sample, characterize, and consolidate for removal and disposal all contaminated soils found on-site, all solids found in tanks (a.k.a. tank bottoms) and any other hazardous waste solid material found on-site;

4. Transport and dispose of all characterized hazardous substances, pollutants, wastes, or contaminants at a RCRA approved disposal facility in accordance with the U.S. EPA Off-Site Rule, 40 CFR 300.440.

5. Backfill the excavated site areas with clean material and topsoil. Restore and vegetate excavated areas to prevent soil erosion.

U.S. EPA has received information that you may be a potentially responsible party (PRP) at this Site. The information used by U.S. EPA in part to make this determination was provided by the group of PRPS that conducted the initial liquids removal action at this Site. The report used by U. S. EPA titled "The RRG/Clayton Liquids Removal, Investigation Report" included a volumetric ranking of PRPs that may have sent liquids, solids and or other material to be processed at the Site. Based on U.S. EPA's review and analysis of the volumetric ranking in that report; the Agency is notifying all PRPs that sent or contributed 75,000 gallons or more to the Site that they are PRPs. This group consists of only 73 of the approximate 2,800 PRPs that sent material to this Site to be processed. However, U.S. EPA calculations indicate that the initial group of 73 PRPs contributed over 72% of the wastes processed at the Site.

The Agency's decision to initially only Notice the 73 largest PRPs at this Site is based on a number of factors. First, U. S. EPA wants to begin a removal action at this Site as soon as possible and having a limited number of PRPs in the group will make this possible. Second, EPA believes that having the small initial group of 73 PRPs will make it easier for them to come to agreement and decisions on the many actions that need to be made during the course of the Site clean up. Finally, U. S. EPA plans to notice the remaining PRPs identified in the aforementioned report but would like input from this initial PRP group on how best to notify them of their responsibility for this Site.

U.S. EPA is inviting the initial group of 73 PRPs to meet with Agency officials on either Tuesday, December 7, 2004, at 1:00 p.m. or on Wednesday December 8, 2004 at 10:00 a.m. Both meetings will be held at the East St. Louis Public Library 5300 State Street, East St. Louis, Illinois 62203. It is only necessary to attend one of the meetings.

By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a PRP, to reimburse U.S. EPA for costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

As a potentially responsible party, you should notify U.S. EPA in writing within ten (10) days after the December 8, 2004 PRP meeting, regarding your willingness to perform or finance the activities described above. If U.S. EPA does not receive a timely response, U.S. EPA will assume that you or your organization does not wish to negotiate a resolution of its potential responsibility in connection with the Site and that you or your organization has declined any involvement in performing the response activities.

Your letter should indicate the appropriate name, address, and telephone number for further contact with you. If you are already involved in discussions with state or local authorities, engaged in voluntary cleanup action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions. Your response should be sent to:

Tom Turner
Associate Regional Counsel
U.S. EPA - Region V
Office of Regional Counsel (C-14J)
77 W. Jackson Boulevard
Chicago, Illinois 60604

If you need further information regarding this letter, you may contact Tom Turner of the Office of Regional Counsel at,(312) 886-6613.

Due to the nature of the problem at this site and the attendant legal ramifications, U.S. EPA strongly encourages you to submit a written response within the time frame specified herein. We hope you will give this matter your immediate attention.

Sincerely,

Beverly J. Kyal

Thomas Geisheeker, Acting Chief
Emergency Response Branch

Attachment: A-General Notice PRP list.

APPENDIX A
List of Potential Responsible Parties Receiving a General Notice Letter for the RRG Clayton Chemical Site (Soil Removal)

NASCOTE INDUSTRIES, INC.
Margaret A. Coughlin Esq.
Dickinson Wright, PLLC
38525 Woodward Ave., Suite 2000
Bloomfield Hills, MI 48304-2970

FORD MOTOR COMPANY
Sir Nicholas V. Scheele, President
Ford Motor Company
One American Road
Dearborn, MI 48126

SIGMA-ALDRICH CORPORATION
Mr. Jai Nagarkatti, President
Sigma-Aldrich Corporation
3050 Spruce Street
St. Louis, MO 63103

MALLINCKRODT INC.
Mr. Peter S. Strassner
Thompson Coburn LLP
One US Bank Plaza
St. Louis, MO 63101-1693

BLISS WASTE OIL COMPANY
Mr. Jerry Bliss, Owner
Bliss Waste Oil Company
149 Strecker Road
Ballwin, MO 63011

A-1 OIL CORPORATION
Mr. Jerry Bliss, Registered Agent
A-1 Oil Corporation
149 Strecker Road
Ballwin, MO 63011

DAIMLERCHRYSLER CORPORATION
Mary Ericson Waters
Daimler-Chrysler Corporation
1000 Chrysler Drive
CIMS 482-13-62
Auburn Hills, MI 48326-2766

LEAR CORPORATION
Mr. Robert E. Rossiter, President
Lear Corporation
21557 Telegraph Road
Southfield, MI 48034

U.S. PAINT CORPORATION
Mr. John Duchardt, President
U.S. Paint Corporation
831 South 21st Street
St. Louis, MO 63103

STERLING LACQUER MANUFACTURING COMPANY
Mr. Leo V. Mitchell, President
Sterling Lacquer Manufacturing Company
3150 Brannon Ave.
St. Louis, MO 63139

SUPERIOR EQUIPMENT COMPANY, INCORPORATED
Bruce A. Morrison Esq.
Green, Hennings & Henry, LLP
705 Olive Street, Suite 614
St. Louis, MO 63101-2208

THE SWAN CORPORATION
Greensfelder, Hemker & Gale, P.C.
2000 Equitable Building
10 South Broadway
St. Louis, MO 63102-1774

PLASTIC PRODUCTS CO., INC.
Ms. Marlene Messin, President
Plastic Products Co., Inc.
30355 Akerson Street
Lindstrom, MN 55045

HUSSMAN CORPORATION
Mr. Randy Smith, President
Hussman Corporation
12999 St. Charles Rock Road
Bridgeton, MO 63044

UOP LLC
Mr. Carlos Guimaraes, President
UOP LLC
25 East Algonquin Road
Building A
Des Plaines, IL 60016

SEQUA CORPORATION
Mr. Norman E. Alexander, Chief Executive Officer
Sequa Corporation
200 Park Avenue
New York, NY 10166

NATIONAL COATINGS INC.
S. David Simpson
Hattery, Simpson & West
Suite 402 Hill Arcade
Galesburg, IL 61402

BOBEN MANUFACTURING COMPANY
Mr. Robert H. Slosberg, Registered Agent
Boben Manufacturing Company
11 Nantucket Ln.
St. Louis, MO 63132

CERRO FLOW PRODUCTS, INC.
Richard F. Ricci Esq.
Lowenstein Sandler PC
65 Livingston Avenue
Roseland, NJ 07068-1791

AAD DISTRIBUTION & DRY CLEANING SERVICES, INC
Mr. Hormoz Pourat c/o Ms. Paula Silverbush Pourat
for AAD Distribution and Dry Cleaning Services, Inc.
5107 Enfield Avenue
Encino, CA 91316

NORTH EAST RECYCLING TRANSPORTATION, INC.
James P. Oliver Esq., Registered Agent
Squire, Sanders & Dempsey L.L.P.
for North East Recycling Transportation, Inc.
4900 Key Tower, 127 Public Square
Cleveland, OH 44114

TEVA PHARMACEUTICALS USA, INC.
Gail S. Port Esq.
Proskauer Rose, LLP
1585 Broadway
New York, NY 10036

OLIN CORPORATION
Mr. Joseph D. Rupp, President
Olin Corporation
501 Merritt 7
Norwalk, CT 06856

DIOSYNTH, INC.
Mr. C. Nederveen, President
Diosynth, Inc.
2136 South Wolf Road
Des Plaines, IL 60018

MONSANTO COMPANY
Mr. Hugh Grant, President
Monsanto Company
800 N. Lindbergh Blvd.
St. Louis, MO 63167

COLEMAN CHEMICAL, INC.
Mr. Albert R. Puntureri, President
Coleman Chemical, Inc.
75 Sanger St.
Peoria, IL 61602

NORFOLK SOUTHERN RAILWAY COMPANY
Mr. Charles W. Moorman, President
Norfolk Southern Railway Company
3 Commercial Place
Norfolk, VA 23510

TNEMEC COMPANY, INC.
Mr. Peter F. Cortelyou, President
Tnemec Company, Inc.
6800 Corporate Dr.
Kansas City, MO 64120

MCINTYRE GROUP, LTD.
Eric E. Boyd Esq.
Seyfarth Shaw LLP
55 E. Monroe St., Suite 4200
Chicago, IL 60603

EXXONMOBIL OIL CORPORATION
Mr. Rex W. Tillerson, President
ExxonMobil Oil Corporation
5959 Las Colinas Blvd.
Irving, TX 75039-2298

CHICAGO DRUM, INC.
Mr. Buddy Ross, President
Chicago Drum, Inc.
6829 Flintlock Road
Houston, TX 77040

UNIVERSAL PACKAGING CORPORATION
Ms. Gloria Cobb, President
Universal Packaging Corporation
4761 Moline Street
Denver, CO 80239

WALKER PADUCAH CORP.
Mr. Craig E. Philips, President
Walker Paducah Corp.
4400 Harding Road
Nashville, TN 37205

SAFETY-KLEEN SYSTEMS, INC.
Frederick J. Florjancic Jr., President & CEO
Safety-Kleen Systems, Inc.
5400 Legacy Dr.
Cluster II, Bldg. 3
Plano, TX 75024

KEYSTONE CONSOLIDATED INDUSTRIES, INC.
Mr. David Cheek, President
Keystone Consolidated Industries, Inc.
dba Keystone Steel & Wire Company
7000 SW Adams St.
Peoria, IL 61641

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY
Mr. Gary L. Rainwater, President
Central Illinois Public Service Company
One Ameren Plaza
1901 Chouteau Avenue
St. Louis, MO 66149

LYON METAL PRODUCTS, L.L.C.
Patrick M. Kinnally Esq.
Kinnally, Krentz, Loran, Hodge & Herman, P.C.
for Lyon Metal Products LLC
Aurora, IL 60507-5030

RILEY BROTHERS COMPANY
Mr. James S. Jennison, President
Jennison Industries, Inc.
on behalf of Riley Brothers Company
106 Washington Avenue
Burlington, IA 56201

TITAN WHEEL CORPORATION OF ILLINOIS
Mr. Ronald B. Schildt, President
Titan Wheel Corporation of Illinois
2701 Spruce Street
Quincy, IL 62301

SILGAN CONTAINERS CORPORATION
Mr. James D. Beam, President
Silgan Containers Corporation
21800 Oxnard St., Suite 600
Woodland Hills, CA 91367

INX INTERNATIONAL INK COMPANY
Mr. Richard Clendenning, President
INX International Ink Co.
651 Bonnie Lane
Elk Grove Village, IL 60007

PENN ALUMINUM INTERNATIONAL, INC.
John Nichols
Penn Aluminum International, Inc.
1117 North 2nd St.
Murphysboro, IL 62966

AFTON CHEMICAL CORPORATION
Mr. C. S. Warren Huang, President
Afton Chemical Corporation
500 Spring St.
Richmond, VA 23219

BEMIS COMPANY, INC.
Mr. Jeffrey Curler, President
Bemis Company, Inc.
222 S. 9th St.
Suite 2300
Minneapolis, MN 55402

STEELCOTE MANUFACTURING COMPANY
Mr. John Milner, President
Steelcote Manufacturing Company
One Steelcote Square
St. Louis, MO 63103

BAKER PETROLITE CORPORATION
Ms. Halina E. Caravello
Baker Petrolite Corporation
12645 West Airport Blvd.
Sugar Land, TX 77478

IMPERIAL HOME DECOR GROUP, INC.
Mr. Douglas R. Kelly, President
Imperial Home Decor Group, Inc.
23645 Mercatile Rd.
Cleveland, OH 44122

DON V. DAVIS COMPANY
Ms. Ophelia Davis, Owner
Don V. Davis Company
5955 Goodfellow Blvd.
St. Louis, MO 63147

THE KANSAS CITY SOUTHERN RAILWAY COMPANY
Mr. Michael Haverty, President
The Kansas City Southern Railway Company
427 W. 12th St.
Kansas City, MO 64121

KOCH INDUSTRIES, INC.
Mr. Joseph Moeller, President
Koch Industries, Inc.
4111 E. 37th St. North
Wichita, KS 67720

VALENTEC WELLS, LLC
President
Valentec Wells, LLC
Lake City Army Ammunition Depot
Building 2
Independence, MO 64051

AMERICAN RECREATION PRODUCTS, INC.
Mr. George J. Grabner Jr., President
American Recreation Products, Inc.
1224 Fern Ridge Parkway
St. Louis, MO 63141

CHEMISPHERE CORPORATION
Mr. Robert F. Schwent, President
Chemisphere Corporation
2101 Clifton Ave.
St. Louis, MO 63139

MARCHEM CORPORATION
Mr. Sandon L. Wool, President
Marchem Corporation
2500 Adie Rd.
Maryland Heights, MO 63043

CURWOOD, INC.
Mr. Tom Sall, President
Curwood, Inc.
2200 Badger Ave.
Oshkosh, WI 54903

ARRIS INTERNATIONAL, INC.
Mr. Randy Brogdon Esq.,
Troutman Sanders LLP
for Arris International, Inc.
600 Peachtree St., Ste. 5200
Atlanta, GA 30308-2216

SAFETY-KLEEN (TS), INC.
Mr. David M. Sprinkle, President
Safety-Kleen (ts), Inc.
5400 Legacy Dr.
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Plano, TX 75024

THE DOW CHEMICAL COMPANY
Mr. Andrew N. Liveris, President
The Dow Chemical Company
2030 Dow Center
Midland, MI 48674

LYON WORKSPACE PRODUCTS, LLC
Mr. R. P. Washington, Chairman
Lyon Workspace Products, LLC
420 North Main Street
Montgomery, IL 60538

METAL CONTAINER CORPORATION
Mr. Joseph P. Sellinger, President
Metal Container Corporation
One Busch Place
St. Louis, MO 63118

CROWN BEVERAGE PACKAGING, INC.
Mr. Robert J. Truitt, President
Crown Beverage Packaging, Inc.
One Crown Way
Philadelphia, PA 19154

DJR HOLDINGS, INC.
Mr. Rodney D. Jarboe, President
DJR Holdings, Inc.
1019 Skinker Parkway
Hazelwood, MO 63042

MITSUBISHI MOTORS NORTH AMERICA, INC.
Mr. Pierre M. Gagnon, President
Mitsubishi Motors North America, Inc.
6400 Katella Ave.
Cypress, CA 90630

SUPERIOR OIL CO., INC.
Mr. Ray Roembke Jr., President
Superior Oil Co., Inc.
400 W. Regent St.
Indianapolis, IN 46225

NORDENIA U.S.A., INC.
Julie O'Keefe Esq.,
Armstrong Teasdale, LLP
for Nordenia U.S.A., Inc.
One Metropolitan Square, Suite 2600
St. Louis, MO 63102-2740

ALLIED HEALTHCARE PRODUCTS, INC.
Mr. Earl R. Refsland, President
Allied Healthcare Products, Inc.
1720 Sublette Ave
St. Louis, MO 63110

CONOPCO, INC.
Mr. Charles B. Strauss, President
Conopco, Inc.
700 Sylvan Ave.
Englewood Cliffs, NJ 07632

LINCOLN INDUSTRIAL CORPORATION
Mr. Mark T. Schroepfer, President
Lincoln Industrial Corporation
One Lincoln Way
St. Louis, MO 63120