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

DEC 1 2 2003

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Exxon Mobil Corporation
Steven P. Schmidt
601 Jefferson Street, Room 1225
Houston, TX 77002

Re: Follow-up 104(e) Request - Exxon Mobil Corporation
Lower Darby Creek Area Superfund Site
Delaware and Philadelphia Counties, Pennsylvania

SDMS DocID 2004769

Dear Mr. Schmidt :

The U.S. Environmental Protection Agency ("EPA") has received the response of Exxon Mobil, Inc. ("Exxon") to its August 2, 2001 Information Request. Based on that response and information obtained by EPA as part of its investigation, EPA is seeking additional information concerning the waste disposal activities of Mobil Oil in Philadelphia between 1958 and 1976.

EPA has reviewed your previous information request response dated August 21, 2001 and has determined that additional information and clarification is needed in order to complete its investigation. EPA hereby requests that Exxon respond completely and timely to the information requested in Enclosure F to this letter.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9604(e), Exxon is required to furnish all information and documents in its possession, custody or control, or in the possession, custody or control of any of its employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), pollutants and/or contaminants as defined by Section 101(33), 42 U.S.C. § 9601(33), which were transported to, stored, treated, or disposed of at the above referenced facility.

Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes EPA to pursue penalties for failure to comply with that section or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

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U.S. Postal Service

CERTIFIED MAIL RECEIPT

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7001 0360 0001 5504 7476

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	**$**

Postmark Here

Sent To Exxon Mobil Corp. Steven J. Schmidt

Street, Apt. No.; or PO Box No. 601 Jefferson St, Room 1225

City, State, ZIP+4 Houston, TX 77002

PS Form 3800, January 2001 See Reverse for Instructions

You must respond in writing to this required submission of information within **thirty (30) calendar days** of your receipt of this letter. The response must be signed by an authorized official of Exxon. If, for any reason, you do not provide all information responsive to this letter, in your answer to EPA you must: (1) describe specifically what was not provided, (2) supply to EPA a clear identification of the document(s) not provided, and (3) provide to EPA an appropriate reason why the document(s) was not provided.

All documents and information should be sent to:

Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

If you have any question concerning this matter, please contact Carlyn Winter Prisk at (215) 814-2625 or you may have your attorney contact Brian Nishitani, Senior Assistant Regional Counsel, at (215) 814-2675.

Sincerely,

Joan Armstrong

Joan Armstrong, Chief
PRP Investigation and
Site Information Section

Enclosures:
- Enclosure A: Lower Darby Creek Area Site Map
- Enclosure B: Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees
- Enclosure C: List of Contractors that May Review Your Response
- Enclosure D: Definitions
- Enclosure E: Instructions
- Enclosure F: Information Requested

cc: Brian Nishitani , Esq. (3RC44)
Carlyn Prisk (3HS11)
April Flipse (PADEP)
Craig Olewiler (PADEP)

Enclosure A

Name: LANSDOWNE
Date: 4/17/2001
Scale: 1 inch equals 1333 feet

Location: 039° 53' 48.1" N 075° 16' 04.4" W
Caption: Lower Darby Creek Area Site

Copyright (C) 1997, Maptech, Inc.

Enclosure B [rev. 11/2003]

ORIGINAL (Red)

List of Contractors That May Review Your Response

- Daston Corporation -
  Contract #68-S3-01-01
  Subcontractor to Daston Corporation is:
  Dynamac Corporation
  Tri State Enterprise Incorporated

- Tetra Tech EM, Inc. -
  Contract #68-S3-0002
  Subcontractor to Tetra Tech EM, Inc. is:
  Eagle Instruments, Inc.

- Ecology and Environment, Inc. -
  Contract #68-S3-0001
  Subcontractor to Ecology and Environment, Inc. is:
  S & S Engineers, Inc.

- IT Corporation - Contract #68-S3-00-06
  Subcontracts to IT Corporation are:
  Weavertown Environmental Group
  Environmental Restoration Company

- Earth Tech, Inc. - Contract #68-S3-00-07
  Subcontractors to Earth Tech, Inc. are:
  Industrial Marine Services. Inc.
  Cline Oil
  Hertz Equipment Rental

- Tetra Tech NUS Inc. -
  Contract #68-S6-3003
  Subcontractors to Tetra Tech NUS Inc. are:
  Gannett Fleming, Inc.
  Dynamic Corporation
  C. C. Johnson & Malhotra, P.C.

- CDM-Federal Programs Corporation -
  Contract #68-S7-3003
  Subcontractors to CDM-Federal Programs Corporation are:
  Tetra Tech EM, Inc.
  Robert Kimball & Associates
  PMA & Associates
  Horne Engineering
  Pacific Environmental Services

- Black and Veatch Waste Science and Technology Corporation/Tetra Tech, Inc. - Contract #68-S7-3002
  Subcontractor:
  Enviro Consultants Group

- Universe Technologies -
  Contract #68-S3-99-02

- Tech Law, Inc. -
  Contract #68-W-00-108

- WRS Infrastructure & Environment, Inc. - Contract # 68-S3-03-02

- Kemron Environmental Services
  Contract # 68-S3-03-05

- Industrial Marine Services, Inc.
  Contract # 68-S3-03-03

- Guardian Environmental Services, Inc.
  68-S3-03-04

List of Inter-Agency Agreements

- General Services Administration
  CERCLA File Room
  Contractor: Booz-Allen & Hamilton

- General Services Administration
  Spectron Superfund Site
  Contractor: Booz-Allen & Hamilton

- General Services Administration
  Breslube Penn Superfund Site
  Contractor: Booz-Allen & Hamilton

List of Cooperative Agreements

- National Association of Hispanic Elderly - #CQ-822511

- AARP Foundation (Senior Environmental Employment) -
  #824021
  #823952

Enclosure C

Business Confidentiality Claims

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you.

Disclosure of Your Response to EPA Contractors and Grantees

EPA may contract with one or more independent contracting firms (see Enclosure B) to review the documentation, including documents which you claim are confidential business information ("CBI"), which you submit in response to this information request, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreement(s) under the Senior Environmental Employment Program (SEE Enrollees). The SEE program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313) The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for agency personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to CERCLA, 42 U.S.C. § 9604(e)(7) and EPA's regulations at 40 C.F.R. § 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed.Reg. 7187 (1993)). If you have any objection to disclosure by EPA of documents which you claim are CBI to any or all of the entities listed in the attachment, you must notify EPA in writing at the time you submit such documents.

Enclosure D

Definitions

- The term "arrangement" shall mean every separate contract or other agreement or understanding between two or more persons, whether written or oral.

- The term "documents" shall mean writings, photographs, sound or magnetic records, drawings, or other similar things by which information has been preserved and also includes information preserved in a form which must be translated or deciphered by machine in order to be intelligible to humans. Examples of documents include, but are not limited to, electronic mail and other forms of computer communication, drafts, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, summaries, pamphlets, books, invoices, checks, bills of lading, weight receipts, toll receipts, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, inter-office and intra-office communications, notations of any conversations (including, without limitation, telephone calls, meetings, and other communications such as e-mail), bulletins, printed matter, computer printouts, invoices, worksheets, graphic or oral records or representations of any kind (including, without limitation, charts, graphs, microfiche, microfilm, videotapes, recordings and motion pictures), electronic, mechanical, magnetic or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings and computer memories), minutes of meetings, memoranda, notes, calendar or daily entries, agendas, notices, announcements, maps, manuals, brochures, reports of scientific study or investigation, schedules, price lists, data, sample analyses, and laboratory reports.

- The term "hazardous substance" means (a) any substance designated pursuant to section 1321(b)(2)(A) of Title 33 [of the U.S. Code], (b) any element, compound, mixture, solution, or substance designated pursuant to section 9602 of [CERCLA], ©) any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of the Solid Waste Disposal Act (42 U.S.C. Section 6921) (but not including any waste the regulation of which under the Solid Waste Disposal Act (42 U.S.C. Section 6901 et seq.) has been suspended by Act of Congress), (d) any toxic pollutant listed under section 1317(a) of Title 33, (e) any hazardous air pollutant listed under section 112 of the Clean Air Act (42 U.S.C. Section 7412), and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to section 2606 of Title 15 [of the U.S. Code]. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

- The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food

chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations in such organisms or their offspring, except that the term "pollutant or contaminant" shall not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under CERCLA, and shall not include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas).

- The term "release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant), but excludes (a) any release which results in exposure to persons solely within a workplace, with respect to a claim which such persons may assert against the employer of such persons, (b) emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine, (c) release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954 (42 U.S.C. Section 2011 et seq.), if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under section 170 of such Act (42 U.S.C. Section 2210), or, for the purposes of section 9604 of [CERCLA] or any other response action, any release of source byproduct, or special nuclear material from any processing site designated under sections 7912(a)(1) or 7942(a) of [CERCLA], and (d) the normal application of fertilizer.

- The term "waste" or "wastes" shall mean and include any discarded materials including, but not limited to, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, pollutants or contaminants, and discarded or spilled chemicals, whether solid, liquid, or sludge.

- The term "you" when referring to an incorporated entity shall mean and include the incorporated entity and its agents and representatives, including, but not limited to, persons directly authorized to transact business on the entity's behalf such as officers, directors, or partners with which the entity is affiliated, employees, accountants, engineers, or other persons who conduct business on the entity's behalf, as well as affiliated entities, including, but not limited to, partnerships, limited liability companies, divisions, subsidiaries, and holding companies.

Enclosure E

Instructions

1. You are entitled to assert a claim of business confidentiality covering any part or all of the information you submit. If you desire to assert a claim of business confidentiality, please see Enclosure C, *Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees*. You must clearly mark such information by either stamping or using any other form of notice that such information is a trade secret, proprietary, or company confidential. To ensure to the greatest extent that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

2. Please provide a separate, detailed narrative response to each question, and to each subpart of each question, set forth in this Information Request. If you fail to provide a detailed response, EPA may deem your response to be insufficient and thus a failure to comply with this Information Request, which may subject you to penalties.

3. Precede each response with the number of the question or subpart of the question to which it corresponds. For each document or group of documents produced in response to this Information Request, indicate the number of the specific question or subpart of the question to which the document(s) responds.

4. Should you find at any time after submission of your response that any portion of the submitted information is false, misrepresents the truth or is incomplete, you must notify EPA of this fact and provide EPA with a corrected written response.

5. Any terms that are used in this Information Request and/or its Enclosures that are defined in CERCLA shall have the meaning set forth in CERCLA. Definitions of several such terms are set forth in Enclosure D, *Definitions*, for your convenience. Also, several additional terms not defined in CERCLA are defined in Enclosure D. Those terms shall have the meaning set forth in Enclosure D any time such terms are used in this Information Request and/or its Enclosures.

Enclosure F

Information Requested

1. In Exxon's August 21, 2001 response to EPA's August 2, 2001 Information Request, Exxon indicated that it was unable to locate any information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which Exxon was operating the Paulsboro oil refinery.

   a. Provide the name, title, area of responsibility, address, and telephone number of each person who, between 1958 and 1976, had or may have any information relating to the generation, storage, treatment, recycling, or formulation of such substances or any information relating to the disposal or transportation of such substances;

   b. Indicate whether each of the above named individuals was interviewed prior to your August 21, 2001 response; and,

   c. Provide a copy of the written interview statement for each person so interviewed.

2. In Exxon's August 21, 2001 response, Exxon indicated that it could not identify any persons currently or formerly employed by the Paulsboro oil refinery who have or may have personal knowledge of its operations and waste disposal practices between 1958 and 1976. Please provide the name, title, area of responsibility, address, and telephone number of each person who, between 1958 and 1976, were:

   a. Responsible at any time for Paulsboro oil refinery's day-to-day business activity from 1958 and 1976;

   b. Responsible for payments of any kind at the Paulsboro oil refinery at any time between 1958 and 1976; and,

   c. Responsible at any time for waste or waste disposal from 1958 to 1976.

3. In Exxon's August 21, 2001 response, Exxon indicated that it was unable to locate any information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which Exxon was operating the Paulsboro oil refinery. If those records are no longer available, indicate the reason they are no longer available. If the records were destroyed, provide EPA with the following:

   a. Exxon's document retention policy;

b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;

c. A description of the type of information that would have been contained in the documents; and,

d. The name, job title, and current or last known address of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

315713

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

AUG 2 2001

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mobil Oil Company
c/o Exxon Mobil Corporation
5959 Las Colinas Boulevard
Irving, TX 75039-2298

Attention: Lee R. Raymond, Chairman

Re: Required Submission of Information
Lower Darby Creek Area Superfund Site - Clearview Landfill, Folcroft Landfill, and Folcroft Landfill Annex

Dear Mr. Raymond:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning the release, or threat of release, of hazardous substances, pollutants or contaminants into the environment at the Clearview Landfill ("Clearview"), Folcroft Landfill ("Folcroft"), and Folcroft Landfill Annex ("Folcroft Annex") portions of the Lower Darby Creek Area Superfund site, located in Delaware and Philadelphia Counties, Pennsylvania (hereinafter the "Site") (see Enclosure F for a list of Questions).

The Site is located in an industrialized portion of southeastern Delaware County and southwestern Philadelphia County, Pennsylvania, along an approximately two-mile stretch of Darby Creek, between Cobbs Creek to the north and the tidal marsh of John Heinz National Wildlife Refuge at Tinicum to the south (see Enclosure A). The Site also includes contaminated portions of areas along Darby Creek downstream as well as a portion of a 3500-acre tidal marsh.

EPA has reason to believe that wastes generated at locations owned or operated by Mobil Oil Company, may have been transported to and disposed of at the Site, specifically at Clearview, Folcroft, and Folcroft Annex. Clearview is located on the east side of Darby Creek; Folcroft and Folcroft Annex are located on the west side of the creek.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), EPA has the authority to require Exxon Mobil Corporation (hereinafter "you"), to furnish all information and documents in your possession, custody or control, or in the

possession, custody or control of any of your employees or agents, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), pollutants and/or contaminants as defined by Section 101(33) of CERCLA, 42 U.S.C. Section 9601(33), which were transported to, stored, treated, or disposed of at the above-referenced Site.

Section 104 of CERCLA authorizes EPA to pursue penalties for failure to comply with that section or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

You must respond in writing to this required submission of information within **fifteen calendar days** of your receipt of this letter. For a corporation, the response must be signed by an appropriately authorized corporate official. For all other entities, the response must be signed by an authorized official of that entity.

If, for any reason, you do not provide all information responsive to this letter, then in your answer to EPA you must: (1) describe specifically what was not provided, and (2) provide to EPA an appropriate reason why the information was not provided.

All documents and information should be sent to:

Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

This required submission of information is not subject to the approval requirements of the *Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501 et seq.*

If you have any questions concerning this matter, please contact Civil Investigator Carlyn Winter Prisk at (215) 814-2625, or have your attorney contact Brian Nishitani of EPA's Office of Regional Counsel at (215) 814-2675. To discuss the Site in general or the nature of the cleanup, contact Kristine Matzko, the Remedial Project Manager, at (215) 814-5719.

Sincerely,

Larry S. Miller
Chief, PRP Investigation and
Site Information Section

Enclosures: **Enclosure A:** Lower Darby Creek Area Site Map
Enclosure B: Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees
Enclosure C: List of Contractors that May Review Your Response
Enclosure D: Definitions
Enclosure E: Instructions
Enclosure F: Questions

cc: Mr. Brian Nishitani (3RC44) EPA Region III, Office of Regional Counsel
Ms. Kristine Matzko (3HS21) EPA Region III, Remedial Project Manager
Mr. Craig Olewiler Pennsylvania Department of Environmental Protection
Ms. April Flipse Pennsylvania Department of Environmental Protection

Enclosure A

Lower Darby Creek Area Site Map

Enclosure A

Enclosure B

Business Confidentiality Claims

You are entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Part 2, Subpart B. Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you. You must clearly mark such claimed information by either stamping or using any other such form of notice that such information is a trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

Disclosure of Your Response to EPA Contractors and Grantees

EPA may contract with one or more independent contracting firms (See "Enclosure C") to review the documentation, including documents which you claim are confidential business information ("CBI"), which you submit in response to this information request, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreements(s) under the Senior Environmental Employee Program ("SEE Enrollees"). The SEE Program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313). The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for EPA personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE Enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to Section 104(e)(7) of CERCLA, 42 U.S.C. Section 9604(e)(7) and EPA's regulations at 40 C.F.R. Section 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed.Reg. 7187 (1993)). If you have any objection to disclosure by EPA of documents which you claim are CBI to any or all of the entities listed in Enclosure C, you must notify EPA in writing at the time you submit such documents.

Enclosure C

List of Contractors that May Review Your Response

- Daston Corporation -
  Contract #68-S3-01-01
  Subcontractor to Daston Corporation is:
  Dynamac Corporation

- Tetra Tech EM, Inc. -
  Contract #68-S3-0002
  Subcontractor to Tetra Tech EM, Inc. is
  Eagle Instruments, Inc.

- Ecology and Environment, Inc. -
  Contract #68-S3-001
  Subcontractor to Ecology and Environment, Inc. is:
  S & S Engineers, Inc.

- Resource Applications, Inc. -
  Contract #68-S3-003
  Subcontracts to Resource Applications, Inc. are:
  C.C. Johnson & Malhotra, Inc.
  Scientific & Environment Associates, Inc.
  Environmental Quality Management, Inc.

- IT Corporation - Contract #68-S#-00-06
  Subcontracts to IT Corporation are:
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- Earth Tech, Inc. - Contract #68-S3-00-07
  Subcontractors to Earth Tech, Inc. are:
  Industrial Marine Services, Inc.
  Cline Oil
  Hertz Equipment Rental

- Guardian Environmental Services, Inc.
  Contract #68-S3-99-04

- ECG Industries, Inc. -
  Contract #68-S3-99-05
  Subcontractor to ECG Industries, Inc. is:
  Earth Tech, Inc.

- Industrial Marine Services, Inc. -
  Contract #68-S3-99-06
  Subcontractors to Industrial Marine Services, Inc. are:
  Earth Tech, Inc.
  Engineering and Environment, Inc.

- Tetra Tech NUS, Inc. -
  Contract #68-S6-3003
  Subcontractors to Tetra Tech NUS, Inc. are:
  Gannett Flemming, Inc.
  Dynamac Corporation
  C.C. Johnson & Malhotra, P.C.

- CDM-Federal Programs Corporation -
  Contract #68-S7-3003
  Subcontractors to CDM-Federal Programs Corporation are:
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  PMA & Associates
  Horne Engineering
  Pacific Environmental Services

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  Contract #68-S7-3002

- Universe Technologies -
  Contract #68-S3-99-02

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  Gannett Flemming, Inc.

List of Cooperative Agreements

- National Association of Hispanic Elderly - #CQ-822511

- AARP Foundation (Senior Environmental Employment) - #824021, #823952

Customer Service Hotline: 1-800-438-2474

Enclosure D

Definitions

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- The term "documents" shall mean writings, photographs, sound or magnetic records, drawings, or other similar things by which information has been preserved and also includes information preserved in a form which must be translated or deciphered by machine in order to be intelligible to humans. Examples of documents include, but are not limited to, electronic mail and other forms of computer communication, drafts, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, summaries, pamphlets, books, invoices, checks, bills of lading, weight receipts, toll receipts, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, inter-office and intra-office communications, notations of any conversations (including, without limitation, telephone calls, meetings, and other communications such as e-mail), bulletins, printed matter, computer printouts, invoices, worksheets, graphic or oral records or representations of any kind (including, without limitation, charts, graphs, microfiche, microfilm, videotapes, recordings and motion pictures), electronic, mechanical, magnetic or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings and computer memories), minutes of meetings, memoranda, notes, calendar or daily entries, agendas, notices, announcements, maps, manuals, brochures, reports of scientific study or investigation, schedules, price lists, data, sample analyses, and laboratory reports.

- The term "hazardous substance" means (a) any substance designated pursuant to section 1321(b)(2)(A) of Title 33 [of the U.S. Code], (b) any element, compound, mixture, solution, or substance designated pursuant to section 9602 of [CERCLA], (c) any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of the Solid Waste Disposal Act (42 U.S.C. Section 6921) (but not including any waste the regulation of which under the Solid Waste Disposal Act (42 U.S.C. Section 6901 et seq.) has been suspended by Act of Congress), (d) any toxic pollutant listed under section 1317(a) of Title 33, (e) any hazardous air pollutant listed under section 112 of the Clean Air Act (42 U.S.C. Section 7412), and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to section 2606 of Title 15 [of the U.S. Code]. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).

- The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release

into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations in such organisms or their offspring, except that the term "pollutant or contaminant" shall not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under CERCLA, and shall not include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas).

- The term "release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant), but excludes (a) any release which results in exposure to persons solely within a workplace, with respect to a claim which such persons may assert against the employer of such persons, (b) emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine, (c) release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954 (42 U.S.C. Section 2011 et seq.), if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under section 170 of such Act (42 U.S.C. Section 2210), or, for the purposes of section 9604 of [CERCLA] or any other response action, any release of source byproduct, or special nuclear material from any processing site designated under sections 7912(a)(1) or 7942(a) of [CERCLA], and (d) the normal application of fertilizer.

- The term "waste" or "wastes" shall mean and include any discarded materials including, but not limited to, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, pollutants or contaminants, and discarded or spilled chemicals, whether solid, liquid, or sludge.

- The term "you" when referring to an incorporated entity shall mean and include the incorporated entity and its agents and representatives, including, but not limited to, persons directly authorized to transact business on the entity's behalf such as officers, directors, or partners with which the entity is affiliated, employees, accountants, engineers, or other persons who conduct business on the entity's behalf, as well as affiliated entities, including, but not limited to, partnerships, limited liability companies, divisions, subsidiaries, and holding companies.

Enclosure E

Instructions

1. You are entitled to assert a claim of business confidentiality covering any part or all of the information you submit. If you desire to assert a claim of business confidentiality, please see Enclosure B, *Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees*. You must clearly mark such information by either stamping or using any other form of notice that such information is a trade secret, proprietary, or company confidential. To ensure to the greatest extent that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

2. Please provide a separate, detailed narrative response to each question, and to each subpart of each question, set forth in this Information Request. If you fail to provide a detailed response, EPA may deem your response to be insufficient and thus a failure to comply with this Information Request, which may subject you to penalties.

3. Precede each response with the number of the question or subpart of the question to which it corresponds. For each document or group of documents produced in response to this Information Request, indicate the number of the specific question or subpart of the question to which the document(s) responds.

4. Should you find at any time after submission of your response that any portion of the submitted information is false, misrepresents the truth or is incomplete, you must notify EPA of this fact and provide EPA with a corrected written response.

5. Any terms that are used in this Information Request and/or its Enclosures that are defined in CERCLA shall have the meaning set forth in CERCLA. Definitions of several such terms are set forth in Enclosure D, *Definitions*, for your convenience. Also, several additional terms not defined in CERCLA are defined in Enclosure D. Those terms shall have the meaning set forth in Enclosure D any time such terms are used in this Information Request and/or its Enclosures.

Enclosure F

QUESTIONS

1. State the name of your company, its mailing address, and telephone number. Further identify:

   a. The dates and states of incorporation of your company;

   b. The date and original state of incorporation of your company; and

   c. The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.

2. What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.

3. Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.

4. Identify the owners and operators of your establishment(s) in the Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide:

   a. The dates of their operation;

   b. The nature of their operation; and

   c. All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).

5. Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.

a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;

b. Describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and

c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.

6. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:

a. The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;

b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;

c. The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;

d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;

e. The types and sizes of containers in which these substances were transported and stored; and

f. The persons or companies that supplied each such hazardous substance to your company.

7. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by-product and waste identified, further provide:

a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;

b. The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;

c. The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;

d. The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;

e. The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and

f. The location and method of treatment and/or disposal of each such by-product or waste.

8. Did your company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckly Trash Hauling, Barratt Rupurt, McCloskey Engineering, Marvin Jonas, Jonas Waste Removal, Schiavo Bros., Inc., ADM Disposal Services and/or any other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:

a. The person with whom you made such a contract or arrangement;

b. The date(s) on which or time period during which such material was removed or transported for disposal;

c. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);

d. The annual quantity (number of loads, gallons, drums) of such material;

e. The manner in which such material was containerized for shipment or disposal;

f. The location to which such material was transported for disposal;

g. The person(s) who selected the location to which such material was transported for disposal;

h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and

i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.

9. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:

   a. Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site;

   b. Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or

   c. Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either directly or through transshipment points) for disposal or treatment.

10. For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:

   a. The date(s) on which such material was disposed of or treated at the Site;

   b. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);

   c. The annual quantity (number of loads, gallons, drums) of such material;

   d. The specific location on the Site where such material was disposed of or treated; and

   e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's(s') possession regarding arrangements made to dispose of or treat such material at the Site.

11. Did your establishment(s), or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:

   a. The date(s) the spill(s)/release(s) occurred;

   b. The composition (i.e., chemical analysis) of the materials which were spilled/released;

   c. The response made by you or on your behalf with respect to the spill(s)/release(s); and

   d. The packaging, transportation, and final disposition of the materials which were spilled/released.

d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

U.S. Postal Service
CERTIFIED MAIL [redacted]
(Domestic Mail Only; No Insurance [redacted]

7000 0520 0025 2484 9804

Postage	$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	**$**	

Recipient's Name (Please Print Clearly) (To be completed by mailer)
Mobil Oil Company
c/o Exxon Mobil Corporation
Street, Apt. No.; or PO Box No.
5959 Las Colinas Blvd
City, State, ZIP+4
Irving, Texas 75039-2298

PS Form 3800, February 2000 See Reverse for Instructions

375714

ExxonMobil
Refining & Supply Company
Global Remediation

601 Jefferson Street Room 1225
Houston, TX 77002

Telephone (713) 656-9074
Facsimile (713) 656-9030
Email steven.p.schmidt@exxonmobil.com

STEVEN P. SCHMIDT

ExxonMobil
Refining & Supply

RECEIVED
AUG 2 2 2001
PRP INFO/INFO SECTION

August 21, 2001

Lower Darby Creek Area Site
Delaware and Philadelphia Co., PA

Ms. Carlyn Winter Prisk (3HS11)
U. S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Overnight Mail

Dear Ms. Prisk:

Attached is ExxonMobil's response to your recent request for information. It is possible that we will supplement this response with additional information.

You may reach me at (713)-656-9074 if you have questions.

Sincerely,

Steven P. Schmidt

Steven P. Schmidt

Attachments

QUESTIONS

1. **State the name of your company, its mailing address, and telephone number. Further identify:**

Exxon Mobil Corporation. The address is 601 Jefferson Street, Room 1225, Houston, TX 77002. Phone: (713)-656-9074.

a. **The dates and states of incorporation of your company;**

b. **The date and original state of incorporation of your company; and**

Exxon Mobil Corporation is a New Jersey corporation with a date of incorporation of August 5, 1882.

c. **The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.**

The parent is Exxon Mobil Corporation. The information requested, while it may be appropriate for a closely held corporation makes no sense for an ExxonMobil. Exxon Mobil Corporation and its predecessors have had interests in hundreds if not thousands of companies. If there are some of particular interest, we will supply the requested information.

2. **What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? What was the nature of your business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.**

The meaning of the phrase "the Philadelphia, Pennsylvania area" was provided by Ms. Carlyn Winter Prisk of USEPA Region III as including the five-county area surrounding the city of Philadelphia, including south New Jersey. Further, Ms. Prisk said to exclude service stations from the scope of this request.

Exxon Mobil Corporation currently owns, operates and/or leases a number of service stations in the Philadelphia, Pennsylvania area. Exxon Mobil Corporation also operates a research and engineering laboratory, lubricant packaging plant and distribution terminal in Paulsboro, New Jersey.

Between 1958 and 1976 the Mobil Oil Company operated an oil refinery in Paulsboro, New Jersey. The refinery was sold to Valero Energy Corporation of San Antonio, TX in 1998.

3. **Identify all persons currently or formerly employed by your establishment(s) who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.**

No such persons have been identified to date.

4. **Identify the owners and operators of your establishment(s) in the Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide:**

   a. **The dates of their operation;**

   b. **The nature of their operation; and**

Mobil Oil Company was the owner and operator of the Paulsboro oil refinery from 1958 until the sale of assets to Valero Energy Corporation in 1998. Valero is the current owner and operator of the Paulsboro oil refinery. Currently, Exxon Mobil Corporation owns and operates the laboratory, lube packaging plant and terminal in Paulsboro, New Jersey.

   c. **All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).**

ExxonMobil objects to the broad scope of this question. No information responsive to this request has been located to date.

5. **Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.**

   a. **Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;**

One record LDCA001-002 was located which lists a transporter who hauled material from the Paulsboro Refinery. I have attached this record for your review.

b. **Describe any permits or permit applications any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and**

c. **Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.**

No information responsive to this request has been located to date.

6. **Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:**

   a. **The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;**

   b. **The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance:**

   c. **The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;**

   d. **The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;**

   e. **The types and sizes of containers in which these substances were transported and stored; and**

   f. **The persons or companies that supplied each such hazardous substance to your company.**

Exxon Mobil Corporation objects to this question, as it is overly broad given the extent of ExxonMobil's operations. If there are specific transactions of interest, please provide us the details of those transactions.

Without waiving this objection, we respond that ExxonMobil is an integrated oil company with operations including sales of various petroleum products as well as petroleum based chemical products. The facilities identified in Question 2 manufactured or transported crude oil fractions exempt as hazardous substances under CERCLA and RCRA.

7. **Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by-product and waste identified, further provide:**

   a. **The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;**

   b. **The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;**

   c. **The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;**

   d. **The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;**

   e. **The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and**

   f. **The location and method of treatment and/or disposal of each such by-product or waste.**

No information responsive to this request has been located to date.

8. **Did your company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckly Trash Hauling, Barratt Rupurt, McCloskey Engineering, Marvin Jonas, Jonas Waste Removal, Schiavo Bros., Inc., ADM Disposal Services and/or any other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:**

   a. **The person with whom you made such a contract or arrangement;**

b. **The date(s) on which or time period during which material was removed or transported for disposal;**

c. **The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);**

d. **The annual quantity (number of loads, gallons, drums) of such material;**

e. **The manner in which such material was containerized for shipment or disposal;**

f. **The location to which such material was transported for disposal;**

g. **The person(s) who selected the location to which such material was transported for disposal;**

h. **The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and**

i. **Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material.**

No relationship with the companies listed above or a municipality, to remove or transport material for disposal between 1958 and 1976, has been indicated by our review of internal information to date.

9. **Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:**

   a. **Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site;**

   b. **Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or**

   c. **Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either**

directly or through transshipment points) for disposal or treatment.

No such people or entities with knowledge of transportation of materials to these sites have been identified to date.

10. **For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, identify:**

    a. **The date(s) on which such material was disposed of or treated at the Site;**

    b. **The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);**

    c. **The annual quantity (number of loads, gallons, drums) of such material;**

    d. **The specific location on the Site where such material was disposed of or treated; and**

    e. **Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's(s') possession regarding arrangements made to dispose of or treat such material at the Site.**

Not applicable.

11. **Did your establishment(s), or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:**

    a. **The date(s) the spill(s) release(s) occurred;**

    b. **The composition (i.e., chemical analysis) of the materials which were spilled/released;**

    c. **The response made by you or on your behalf with respect to the spill(s)/release(s); and**

    d. **The packaging, transportation, and final disposition of the materials which were spilled/released.**

Not applicable.

12. **Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same persons identified by your answer to question 3, so indicate.**

No such persons have been identified.

13. **Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.**

No information responsive to this request has been located to date.

14. **If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone umber, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.**

No such persons have been identified.

15. **Representative of your establishment(s):**

    a. **Identify the person(s) answering these questions on behalf of your establishment(s), including full name, mailing address, business telephone number, and relationship to the company.**

    b. **Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.**

These responses were prepared by Steven P. Schmidt. Mr. Schmidt is a Superfund Consultant for Exxon Mobil Corporation. His contact information is:

Steven P. Schmidt
601 Jefferson Street Room 1225
Houston, TX 77002
Phone: (713)-656-9074
Fax: (713)-656-9030
Email: steven.p.schmidt@exxonmobil.com

16. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

a. Your document retention policy;

b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;

In 1997, there was a casualty fire loss of boxes of documents that included a file called Tinicum Marsh Site.

c. A description of the type of information that would have been contained in the documents; and

d. The name, job title, and most current address known to you of the person(s) who would have produced these documents; the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Exxon Mobil Corporation has no knowledge that any relevant documents solicited in this information request are, or ever were, available.

No such persons have been identified.

ATTACHMENT I

RECORDS SEARCH

The following is the result of all information known and available of all transporters who hauled material from the Paulsboro Refinery up to 12/31/80. Note: No records are known to exist or were found with information prior to 1975.

YEAR	FACILITY NAME	TRANSPORTER	WASTE	QUANTITY
1975	Paulsboro Refinery	Robert T. Winzinger, Inc.	11	Unknown

This redacted area contains information outside the scope of the Required Submission of Information.

WWMcCoy
10/31/88

205384

ATTACHMENT
RECORDS SEARCH

The following is the result of all information known and available of all transporters who hauled material for the Paulsboro Refinery up to 12/31/80. Note: No records are known to exist or were found with information prior to 1975.

YEAR	TRANSPORTER	DISPOSAL FACILITY	WASTE Code	QUANTITY
1975	Robert T. Winzinger, Inc.	Mackland Landfill, Deptford	Oily sludge, Coke fines and oily sand (Old Pond) //	Unknown

This redacted area contains information outside the scope of the Required Submission of Information.