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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Cohen Iron Works
c/o Cohen Metals Group, LLC
Richard Cohen, Officer
2617 Saint Davids Lane
Ardmore, PA 19003

FEB 14 2013

Re: Required Submission of Information
Lower Darby Creek Area Superfund Site,
Operable Unit 1 - Clearview Landfill
Darby Township, Delaware County and and Philadelphia, Pennsylvania

Dear Mr. Cohen:

The U.S. Environmental Protection Agency ("EPA") is seeking information related to the release, or threat of release, of hazardous substances, pollutants or contaminants into the environment from Operable Unit 1 of the Lower Darby Creek Site ("Site"). EPA is investigating the source of contamination in the vicinity of the Clearview Landfill, also known as Heller's Dump (collectively, "Clearview"), located at or near 83rd Street and Buist Avenue in Philadelphia, PA and bordering Darby Creek in Darby Township. The Site also includes the Folcroft Landfill and Annex located approximately two miles away in Folcroft Borough, Delaware County. This information request is limited to Clearview. A witness interviewed in connection with the Site recalled that Warren B. Harmon, Inc, and/or Harway, Inc. transported waste from Cohen Iron Works on a daily basis and disposed of such waste at various locations, including Clearview (see Enclosure F). The specific information required is attached to this letter as Enclosure E.

Pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9604(e), EPA has the authority to require Cohen Metal Group LLC ("Cohen" or "you") 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) of CERCLA, 42 U.S.C. § 9601(33), which were transported to, stored, treated, or disposed of at the above-referenced Site.

Please respond in writing to this required submission of information within **thirty (30) calendar days** of your receipt of this letter.

Printed on 100% recycled/recyclable paper with 100% post-consumer fiber and process chlorine free.
Customer Service Hotline: 1-800-438-2474

If, for any reason, Cohen does not provide all information responsive to this letter, then in its answer to EPA Cohen should: (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. Maria Goodine (3HS62)
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 Compliance Officer Maria Goodine at (215) 814-2488, or have your attorney contact Senior Assistant Regional Counsel Bonnie A. Pugh at (215) 814-2680.

Sincerely,

Joanne Marinelli, Chief
Cost Recovery Branch

Enclosures:
A. Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees
B. List of Contractors that May Review Your Response
C. Definitions
D. Instructions
E. Information Requested
F. Interview Summary

cc: Bonnie A. Pugh (3RC43)
Maria Goodine (3HS62)
Joshua Barber (3HS21)
Noreen Wagner (PADEP)

Enclosure A

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 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 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. § 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 Enclosure B, you must notify EPA in writing at the time you submit such documents.

Enclosure B

[rev. 10/2012]

List of Contractors That May Review Your Response

Emergint Technologies, Inc.
Contract # EP-W-11-025
Subcontractor: Booz-Allen & Hamilton

Booz-Allen & Hamilton
Contract # GS-35F-0306J (GSA Schedule)

CDM-Federal Programs Corporation
Contract # EP-S3-07-06
Subcontractors: L. Robert Kimball & Associates Inc.
Avatar Environmental LLC
Terradon Corporation

Chenega Global Services, LLC
Contract #EP-S3-09-02

EA Engineering, Science and Technology, Inc.
Contract #EP-S3-07-07
Subcontractor: URS

Eisenstein Malanchuck, LLP
Contract #EP-W-07-079
Subcontractors: R. M. Fields International, LLC
James C. Hermann & Associated

Hydrogeologic (HGL)
Contract #EP-S3-07-05
Subcontractor: CH2MHill
Sullivan International

Weston Solutions
Contract #EP-S3-1005

Tech Law, Inc.
Contract #EP-S3-1004

Tetra Tech NUS, Inc.
Contract #EP-S3-07-04

Kemron Environmental Services, Inc.
Contract #EP-S3-12-01,
Subcontractor: AECOM Technical Services, Inc.

Guardian Environmental Services Company, Inc.
Contract #EP-S3-12-02,
Subcontractors: Aerotek, Inc.,
Tetra Tech, Inc.

Environmental Restoration, LLC
Contract # EP-S3-12-03
Subcontractors: Aerotek, Inc
Haas Environmental, Inc,
Hertz

WRS Infrastructure & Environment, Inc.
Contract # EP-S3-12-05

Industrial Economics, Inc.
Contract # EP-W-06-092

Cooperative Agreements

National Association of Hispanic Elderly
CA# Q83424401
CA # ARRA 2Q8343730-01

National Older Workers Career Center
CA# Q-835030

Enclosure C

Definitions

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

2. 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.

3. 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. § 6921) (but not including any waste the regulation of which under the Solid Waste Disposal Act, 42 U.S.C. § 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. § 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).

4. 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).

5. 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. § 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. § 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 42 U.S.C. §§ 7912(a)(1) and 7942(a) and (d) the normal application of fertilizer.

6. 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.

7. 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 D

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

Enclosure E

Information Required

In the following questions, the terms "Cohen," "you" and "your" refer to Cohen Metals Group, LLC. The term "Philadelphia area" refers to southeastern Pennsylvania and southern New Jersey.

1. Describe Cohen's corporate history in detail. Your answer should include specific information on any mergers and acquisitions, name changes, asset purchases/sales etc. involving Cohen and its relationship to Cohen Iron Works and include complete copies of all relevant documents.

2. What is the current nature of the business or activity conducted by Cohen in the Philadelphia area?

3. What was the nature of Cohen Iron Works' business or activity in the Philadelphia area between 1958 and 1976? Please describe in detail. Is the Springfield Industrial Park complex location still in operation?

4. Identify all persons currently or formerly employed by Cohen who have or may have personal knowledge of Cohen Iron Works' operations and waste disposal practices between 1958 and 1976. For each such person, state that person's 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.

5. Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at Cohen Iron Works' Philadelphia area facilities between 1958 and 1976. 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 at Cohen Iron Works' Philadelphia area facilities;

   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 at Cohen Iron Works' Philadelphia area facilities;

   d. The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled at Cohen Iron Works' Philadelphia area facilities;

   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 Cohen Iron Works' Philadelphia area facilities.

6. Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled at Cohen Iron Works' Philadelphia area facilities between 1958 and 1976. With respect to each such by-product and waste identified, further identify:

a. The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled at Cohen Iron Works' Philadelphia area facilities;

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

c. The annual quantity of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled at Cohen Iron Works' Philadelphia area facilities;

d. The types, sizes and numbers of containers used to treat, store, or dispose 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.

7. Did Cohen Iron Works ever contract with, or make arrangement with any of the following companies: Clearview Land Development Company, the Clearview Landfill, Heller's Dump, Richard or Edward Heller, Eastern Industrial Corporation, Tri-County Hauling, Patrick Bizzari Hauling, "Charles Crumbley," Ace Service Corp./Ace Dump Truck, Edward Lawrenson, Inc., "Quickway," "Nu Way," "Bennie's Hauling," William Adams and Sons, "Al Gonnelli," Schiavo Brothers, Inc., "Maritime," Dorner Trash, Harway, Inc./Warren Harmon, Inc., Northeast Disposal, Donald Vile, Inc., Disposal Corporation of America, "White Glove Trash," or any other company or municipality to remove or transport material from Cohen Iron Works' Philadelphia area facilities for disposal between 1958 and 1976? If so, for each transaction identified above, please identify:

a. The person with whom Cohen Iron Works 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 Cohen Iron Works dealt concerning removal or transportation of such material; and

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

8. Identify individuals employed by Cohen Iron Works or currently employed by Cohen 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 Cohen Iron Works' Philadelphia area facilities between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same person identified by your answer to Question 4, so indicate.

9. For every instance in which Cohen Iron Works disposed of or treated material at Clearview 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 Cohen's possession regarding arrangements made to dispose of or treat such material at the Site.

10. Did Cohen Iron Works or any other company or individual, ever spill or cause a release of any chemical, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste at Clearview? If so, identify the following:

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

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

c. The response made by Cohen Iron Works or on its behalf with respect to the spill(s)/release(s); and

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

11. Did Cohen Iron Works or any person or entity on its behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview? If so, please provide all documents pertaining to such assessments or investigations.

12. If you have any information about other parties who may have information which many assist the EPA in its investigation of Clearview, or who may be responsible for the generation of, transportation of, or release of contamination at Clearview, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, 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.

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

14. Provide the name, title, current address, and telephone number of the individual representing Cohen to whom future correspondence or telephone calls should be directed.

15. 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;

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.

Enclosure F

Interview Summary

INTERVIEW SUMMARY
Task Order 0001 Site 2
Lower Darby Creek Area

Warren B. Harmon, Sr.

Prepared for:

U.S. Environmental Protection Agency
Region 3
Enforcement Support Services
Hazardous Site Cleanup Division
1650 Arch Street
Philadelphia, PA 19103

Prepared by:

Chenega Integrated Systems, LLC
4651 Salisbury Road
Quadrant 1, Suite 251
Jacksonville, FL 32256

Work Assignment Number:	Task Order 0001 Site 2
Date Submitted:	April 3, 2006
Contract Number:	EP-S3-04-01
EPA Work Assignment Manager:	Carlyn Winter Prisk
Telephone Number:	(215) 814-2625
Chenega Project Manager:	Ilona Poppke
Telephone Number:	(215) 491-7286
Interviewer:	Michael McCloskey Tri-State Enterprise

Name: Warren B. Harmon, Sr. ("WITNESS")
344 Barretts Run Road
Bridgeton, NJ 08302

Affiliation: Former Owner/Operator, Warren B. Harmon, Inc. and Harway, Inc.

Telephone: (856) 455-6854
Type of Interview: In-Person
Date of Interview: March 28, 2006

On March 28, 2006, the WITNESS was interviewed at the McDonald's parking lot in Salem, New Jersey by Michael McCloskey, Senior Investigator, of Tri-State Enterprise. The WITNESS was interviewed as part of the Potentially Responsible Party search currently being conducted under Task 0001 Site 2 involving the Lower Darby Creek Area Site in Delaware County, Pennsylvania (the "Site.") This interview focused on the Clearview Landfill and the Folcroft Landfill. The WITNESS was provided with a copy of the letter of introduction, advised of the nature of the questions to be asked and that the interview was voluntary. The WITNESS stated that he is not represented by an attorney in this manner and does not want an attorney present. No other persons were present, and this interview was not tape-recorded.

During the course of this interview, the WITNESS responded to questions based on guidelines provided by the United States Environmental Protection Agency for former owner/operators.

The WITNESS was shown an aerial photograph of both the Folcroft Landfill and the Clearview Landfill. These aerial photographs were used as a reference throughout the interview. The aerial photographs used during this interview will be forwarded under separate cover.

The WITNESS was asked to explain his association with the Clearview Landfill, Folcroft Landfill, and Harway, Inc.

The WITNESS stated that he owned and operated two waste disposal companies during the 1960's and 1970's. The WITNESS stated that these two companies were the following:

- Warren B. Harmon, Inc. (WBH): The WITNESS stated that he was the sole owner of this company. However, his son, Warren B. Harmon, Jr., and Vernon Calloway were partners in the operation.
- Harway, Inc. (HI): The WITNESS stated that he was in partnership with his son, Warren B. Harmon, Jr., and Vernon Calloway. The WITNESS stated that his son operated this company.

The WITNESS stated that both WBH and HI operated out of a garage and parking area located at the corner of Reed and Eagle Roads in Springfield, Pennsylvania.

The WITNESS stated that he operated WBH and HI with his partners, Warren B. Harmon, Jr. and Vernon Calloway. The WITNESS stated that although WBH and HI were separate corporate entities, they were both operated interchangeably. The WITNESS further explained that WBH and HI serviced the same customers, and all billing for their service was processed through WBH.

The WITNESS stated that during the time period the Folcroft Landfill and Clearview Landfill were in operation, WBH and HI operated four roll-off trucks, three rear-end loaders, and owned approximately 100 trash containers ranging in size from 20-cubic yards to 40-cubic yards.

The WITNESS stated that WBH and HI were purchased by Harvey and Harvey of Delaware in 1988. The WITNESS stated that this purchase included all receivables and all equipment owned by WBH and HI. The WITNESS stated that at the time of the sale, WBH and HI had approximately 200 customers, six roll-off trucks, and approximately 100 containers.

When asked if WBH and HI transported waste to the Folcroft Landfill, the WITNESS stated "yes." The WITNESS stated that during the time period that the Folcroft and Clearview Landfills were in use, WBH and HI transported waste to the following locations:

- Folcroft Landfill: The WITNESS stated that both WBH and HI disposed of waste on a daily basis during the years the Folcroft Landfill was in use.
- Clearview Landfill: The WITNESS stated that both WBH and HI disposed of waste at the Clearview Landfill, although they used this landfill much less often than the Folcroft Landfill.
- Knickerbocker Landfill.
- Delaware County Incinerators: The WITNESS stated that WBH and HI transported waste to the Delaware County Incinerator located at the base of Folcroft Landfill and the Delaware County Incinerator located on Marpit Drive.
- Carson Landfill: The WITNESS stated that he is not certain of the name of this landfill. He stated that it is located in southern New Jersey.

The WITNESS was asked to identify the locations from which he picked up and transported waste to the Folcroft Landfill.

The WITNESS stated that from 1965 to 1975, he had a contract with Marple Township to pick up all residential and commercial waste in the limits of Marple Township.

The WITNESS stated that he recalls that the following customers' waste was transported to the Folcroft Landfill:

- Marple Township: The WITNESS stated that WBH and HI picked up all residential and commercial waste in Marple Township. The WITNESS stated that WBH held the township contract for waste removal from approximately 1961 to 1975.

- Cohen Iron Works: The WITNESS stated that this company is located in the Springfield Industrial Park complex. The WITNESS could not recall the size of the container at this location. The WITNESS stated that this was a daily stop.

- Morton Rug Company: The WITNESS stated that the Morton Rug Company was also located in the Springfield Industrial Park. The WITNESS stated that this company had a 20-cubic yard container that was picked up three times a week.

- Antonini Construction Company (correct spelling unknown): The WITNESS stated that WBH and HI provided 40-cubic yard containers for Antonini at numerous construction sites throughout Delaware County, Pennsylvania.

- Acme Super Markets: The WITNESS stated that Acme had two stores in Marple Township and he picked up waste from both of these stores. The WITNESS stated that each store had a 20-cubic yard container that was picked up once daily.

The WITNESS stated that WBH and HI also transported this waste to the Clearview Landfill. The WITNESS stated that he utilized the Clearview Landfill when the Folcroft Landfill was closed due to fires or mud.

The WITNESS stated that he could not recall any further names of companies from which he picked up and disposed of waste at the Clearview or Folcroft Landfill.

When asked the names of drivers that worked for WBH and HI and transported waste to either the Folcroft Landfill or the Clearview Landfill, the WITNESS provided the following:

- Warren B. Harding, Jr.: The WITNESS stated that his son is deceased.
- Robin Buono: The WITNESS stated that Buono is still living in Delaware County.
- Doc (unknown last name): The WITNESS stated that Doc currently works for Marple Township as a trash truck driver.

The WITNESS stated that he could not recall any additional names.

The WITNESS was asked the names of other transporters who disposed of waste at the Folcroft and Clearview Landfill. The WITNESS stated that he could not recall any specific names of companies that disposed of waste at the Clearview Landfill. He indicated that he can recall a few companies that disposed of waste at the Folcroft Landfill and provided the following:

- Nu Way: The WITNESS stated that Nu Way operated numerous roll-off trucks. He had been told by one of the owners, Richard Meade, that Scott Paper was their biggest customer, and Nu Way charged Scott Paper $60,000.00 per week for trash service. The WITNESS stated that Nu way was owned and operated by Richard Meade and Phil Weaverling.

- Banta Brothers: The WITNESS does not know the trade name of Banta. He indicated that Banta Brothers operated numerous roll-off trucks. The WITNESS stated that Banta picked up waste from most of the industries located in the City of Chester. The WITNESS could not be more specific.

- White Glove: The WITNESS stated that White Glove operated rear-end loader trucks, and he observed these trucks dispose of waste at both the Clearview and Folcroft Landfills.

- Charles McFall: The WITNESS stated that McFall operated numerous dump trucks. The WITNESS stated that he observed these trucks dispose of waste at both the Clearview and Folcroft Landfills. The WITNESS does not know the trade name for McFall.

"I declare under penalty of perjury that the foregoing is true and correct."

Executed on _____ Signed _____
(Date) (Name)