RICHARDSON
THE POWER TO SELL

September 5, 2012

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Steinmetz:

I am responding to EPA's letter addressed to The Richardson Company, 1818 Market Street, Suite 2800, Philadelphia, PA 19103-3626 requesting Submission of Information Safety Light Corporation Superfund Site Bloomsburg, Pennsylvania. A copy of the EPA's letter is enclosed for your reference.

I would like to inform the EPA that The Richardson Company referred to in the letter is not related to the The Richardson Company - Training for the Banking Industry d/b/a The Richardson Company located at 1818 Market Street, Suite 2800, Philadelphia, PA 19103-3626. The Richardson Company - Training for the Banking Industry d/b/a The Richardson Company was originally incorporated on July 27, 1989. The company provides sales training and education services and has never been involved in manufacturing or in the handling of any hazardous substances, pollutants or contaminants.

Per your suggestion during our telephone conversation today, I am providing you with a copy of the articles of incorporation for the company.

As a matter of background information, The Richardson Company – Training for the Banking Industry was originally incorporated on July 27, 1989, as a Pennsylvania corporation. Effective July 11, 1994, the company merged with Richardson Newco to become a Pennsylvania business trust (the "Trust"). On December 8, 1999, the Trust was merged with an into Richardson Newco, Inc., a Pennsylvania corporation, within an immediate change name to "The Richardson Company -Training for the Banking Industry.

The following documents are attached:

1. Articles of Incorporation of Richardson Newco, Inc. dated December 8, 1999
2. Correspondence from the Commonwealth of Pennsylvania Department of Banking dated December 7, 1999 confirming the original incorporation date of the company as being July 27, 1989 and recognizing the formation of Richardson Newco, Inc. and the merger of the Trust into Richardson Newco, Inc. with an immediate name change to The Richardson Company - Training for the Banking Industry d/b/a The Richardson Company
3. Articles of Merger dated December 8, 1999

Please reach out with any questions you may have.

Sincerely,

William Zarrilli
Chief Financial Officer

Phone: 215-940-8106
Email: bill.zarrilli@richardson.com
Website: www.richardson.com

9988- 411

Microfilm Number _____
Entity Number 2912077

Filed with the Department of State on DEC 08 1999

ARTICLES OF INCORPORATION - FOR PROFIT
DSCB:15-1306/2102/2303/2702/2903/7102a (Rev 90)

Indicate type of domestic corporation (check one):

_X_ Business-stock (15 Pa.C.S. §1306)
___ Business-nonstock (15 Pa.C.S. §2102)
___ Business-statutory close (15 Pa.C.S. §2303)
___ Management (15 Pa.C.S. §2702)
___ Professional (15 Pa.C.S. §2903)
___ Cooperative (15 Pa.C.S. §7102A)

In compliance with the requirements of the applicable provisions of 15 Pa.C.S. (relating to corporations and unincorporated associations) the undersigned, desiring to incorporate a corporation for profit hereby state(s) that:

1. The **name** of the corporation is: Richardson Newco Inc.

2. The (a) **address** of this corporation's initial registered office in this Commonwealth or (b) **name** of its commercial registered office provider and the county of venue is:

(a) 1521 Locust Street, 2nd Floor Philadelphia PA 19102 Philadelphia
Number and Street City State Zip County

(b)c/o: _____
Name of Commercial Registered Office Provider County

For a corporation represented by a commercial registered office provider, the county in (b) shall be deemed the county in which the corporation is located for venue and official publication purposes.

3. The corporation is incorporated under the provisions of the Business Corporation Law of 1988.

4. The aggregate number of shares authorized is: 1,000 $.01 par (other provisions, if any, attach 8 1/2 x 11 sheet)

5. The name and address, including street and number, if any, of each **incorporator** is:

Lisa D. Schumm, Ledgewood Law Firm, P.C., 1521 Locust Street, Phila., PA 19102

6. The specified effect date, if any, is _____
month day year hour, if any

7. Any additional provisions of the articles, if any, attach an 8 1/2 x 11 sheet.

8. **Statutory close corporation only:** Neither the corporation nor any shareholder shall make an offering of any of its shares of any class that would constitute a "public offering" within the meaning of the Securities Act of 1933 (15 U.S.C. 77a et seq.).

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9. **Cooperative corporations only:** (Complete and strike out inapplicable term) The common bond of membership among its members/shareholders is:

IN TESTIMONY WHEREOF, the incorporator has signed these Articles of Incorporation this 30 day of December, 1999.

Lisa D. Schuman
(Signature)

LS\Richardson\Newco I articles of incorporation

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF BANKING
333 Market Street, 16th Floor
Harrisburg, PA 17101-2290

December 7, 1999

Ms. Lisa D. Schumm
Paralegal
LEDGEWOOD LAW FIRM, P.C.
1521 Locust Street, 8th Flor
Philadelphia, PA 19102

Dear Ms. Schumm:

Based on the written representations of the nature of the business to be conducted, this will advise you that the Department of Banking will not object to the registration of the name, "The Richardson Company - Training for the Banking Industry."

As a matter of background information, The Richardson Company - Training for the Banking Industry (the "Trust") was originally incorporated on July, 27, 1989, as a Pennsylvania corporation. Effective July 11, 1994, The Richardson Company merged with Richardson Newco to become a Pennsylvania business trust. The Trust will now be merging with and into Richardson Newco, Inc., a Pennsylvania corporation, with an immediate change in name to "The Richardson Company - Training for the Banking Industry."

It is understood that the applicant will not engage or represent to be engaged in any type of financial business which would include, but not be limited to, a prohibition on the taking of deposits, making of loans, acting as a fiduciary or the business of banking in general.

The Department's position is based on the facts, conditions and representations made in your facsimile request of December 6, 1999. Any changes in these facts, conditions or representations could result in a reversal of the Department's position.

Very truly yours,

Joseph A. Moretz

Joseph A. Moretz
Manager - Corporate
Applications Division

JAM:kse

9989-1791

Microfilm Number
Entity Number 2912077

DEC 08 1999

Secretary of the Commonwealth

D

ARTICLES OF MERGER-DOMESTIC BUSINESS CORPORATION
DSCB:15-1926(Rev 90)

In compliance with the requirements of 54 Pa.C.S. §1926 (relating to articles of merger or consolidation), the undersigned business corporation, desiring to effect a merger, hereby state that:

1. The **name** of the corporation surviving the merger is: Richardson Newco Inc. (Immediately changing its name to The Richardson Company - Training for the Banking Industry

2. **(Check and complete one of the following):**

X The surviving corporation is a domestic business corporation and the (a) **address** of its current registered office in this Commonwealth or (b) **name** of its commercial registered office provider and the county of venue is (the Department is hereby authorized to correct the following information to conform to the records of the Department):

(a) 1521 Locust Street, 2nd Floor, Philadelphia, PA 19102 Philadelphia County
Number and Street City State Zip County

(b) c/o:
Name of Commercial Registered Office Provider County

For a corporation represented by a commercial registered office provider, the county in (b) shall be deemed the county in which the corporation is located for venue and official publication purposes.

___ The surviving corporation is a qualified foreign business corporation, incorporated under the laws of_____and the (a) **address** of its current registered office in this Commonwealth or (b) **name** of its commercial registered office provider and the county of venue is (the Department is hereby authorized to correct the following information to conform to the records of the Department):

(a)
Number and Street City State Zip County

(b) c/o:
Name of Commercial Registered Office Provider County

For a corporation represented by a commercial registered office provider, the county in (b) shall be deemed the county in which the corporation is located for venue and official publication purposes.

___ The surviving corporation is a non-qualified foreign business corporation, incorporated under the laws of_____ and the **address** of its principal office under the laws of such domiciliary jurisdiction is:

Number and Street City State Zip County

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3. The name and the address of the registered office in this Commonwealth or name of its commercial registered office provider and the county of venue of each other domestic business corporation and qualified foreign business corporation which is a party to the plan of merger are as follows:

Name of Corporation	Address of Registered Office
The Richardson Company-Training For The Banking Industry	1521 Locust St., 3rd Floor Philadelphia, Pa. 19102

4. **(Check and, if appropriate, complete one of the following):**

X The plan of merger shall be effective upon filing these Articles of Merger in the Department of State.

___ The plan of merger shall be effective on , 199 , at o'clock.

5. The manner in which the plan of merger was adopted by each domestic corporation is as follows:

Name of corporation	Manner of adoption
Richardson Newco Inc.	Board of directors and shareholder approval

6. **(Strike out this paragraph if no foreign corporation is a party to the merger)**. ~~The plan was authorized, adopted or approved, as the case may be, by the foreign business corporation (or each of the foreign business corporations) party to the plan in accordance with the laws of the jurisdiction in which it is incorporated.~~

7. **(Check, and if appropriate, complete one of the following):**

X The plan of merger is set forth in full in Exhibit A attached hereto and made a part hereof.

___ Pursuant to 15 Pa.C.S. §1901 (relating to omission of certain provisions from filed plans) the provisions, if any, of the plan of merger that amend or constitute the operative Articles of Incorporation of the surviving corporation as in effect subsequent to the effective date of the plan are set forth in full in Exhibit A attached hereto and made a part hereof. The full text of the plan of merger is on file at the principal place of business of the surviving corporation, the address of which is:

Number and Street	City	State	Zip	County

[SIGNATURES CONTAINED ON FOLLOWING PAGE]

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IN TESTIMONY WHEREOF, the undersigned corporation or each undersigned corporation has caused these Articles of Merger to be signed by a duly authorized officer thereof this 3rd day of December, 1999.

RICHARDSON NEWCO INC.

By:_____
Name: David J. DiStefano
Title: Sr. Vice President

THE RICHARDSON COMPANY - TRAINING FOR THE BANKING INDUSTRY

By:_____
Name: David J. DiStefano
Title: Sr. Vice President

LS\Richardson\Articles of Merger

9989-1794

PLAN OF MERGER
OF

THE RICHARDSON COMPANY - TRAINING FOR THE BANKING INDUSTRY
(a Pennsylvania Business Trust)

WITH AND INTO

RICHARDSON NEWCO INC.
(a Pennsylvania corporation)

PLAN OF MERGER (the "Plan") with respect to THE RICHARDSON COMPANY - TRAINING FOR THE BANKING INDUSTRY, a Pennsylvania business trust ("Richardson") and RICHARDSON NEWCO INC., a Pennsylvania corporation ("Newco") Richardson and Newco are hereinafter sometimes collectively referred to as the "Constituent Associations."

1. Effectiveness. This Plan shall be effective on the later of (a) the date that Articles of Merger incorporating this Plan (the "Articles of Merger") are filed with the Department of State of the Commonwealth of Pennsylvania (the "Department of State") or (b) the date set forth as the effective date in the Articles of Merger filed in the Department of State. The date determined in accordance with the preceding sentence is referred to hereinafter as the "Effective Date."

2. Effect. On the Effective Date (as defined in paragraph 1), Richardson shall be merged with and into Newco, and the separate existence of Richardson, except insofar as it may be continued by law, shall cease, all with the effect provided in Section 1929 of the Business Corporation Law of 1988 of the Commonwealth of Pennsylvania (the "1988 BCL"). Newco shall be, and is sometimes hereinafter referred to as, the "Surviving Association."

3. Articles of Incorporation. On and after the Effective Date, the Articles of Incorporation of Newco shall be the governing instrument of the Surviving Association until changed in accordance with the Bylaws of the Surviving Association and applicable laws.

4. Directors and Officers. On and after the Effective Date, until changed in accordance with the Bylaws of the Surviving Association, the directors and officers of the Surviving Association shall be the directors and officers of Newco immediately prior to the "Effective Date, to hold such office in accordance with law and the Bylaws of the Surviving Association.

5. Cancellation of Richardson Units. On the Effective Date, each unit of beneficial interest ("Richardson Unit") outstanding immediately prior to the Effective Date, by virtue of the Merger and without any action on the part of the holder thereof, and each Richardson Unit held in the treasury of Richardson, shall be cancelled.

6. Newco Shares. Each Newco share outstanding immediately prior to the Effective Date shall not be converted or exchanged in the Merger but shall remain outstanding as one share of the Surviving Association.

7. Exchange of Units. As soon as practicable after the Effective Date, each holder of an outstanding certificate or certificates that prior to the Merger represented Richardson Units shall surrender that certificate or certificates with an appropriate letter of transmittal to the Secretary of the Surviving Association.

8. Name of Surviving Association. As of the Effective Date, the name of the Surviving Association shall be changed to "The Richardson Company - Training for the Banking Industry."

9. Termination. This Plan may be terminated at any time before or after adoption and approval of it by the shareholders of Newco or the beneficiaries of Richardson or both, if such approval is required, but not later than the Effective Date, by agreement of the Board of Directors and Trustees, as the case may be, of the Constituent Associations. In the event of a termination after Articles of Merger have been filed in the Department of State and before the Effective Date, a timely statement of termination shall be filed in the Department of State by the terminating entity.

10. Further Assurances. This paragraph 10 shall apply at any time the Surviving Association, or its successors or assigns, shall consider or be advised that any further assignments or assurances in law or any other acts are necessary or desirable to (a) vest, perfect or confirm, of record of otherwise, in the Surviving Association its rights, title or interest in, to or under any of the rights, properties or assets of Richardson acquired or to be acquired by the Surviving Association as a result of, or in connection with, the Merger, or (b) otherwise carry out the purposes of this Plan. In such case, Richardson and its proper officers and trustees shall be deemed to have granted to the Surviving Association an irrevocable power of attorney to execute and deliver all such proper deeds, assignments and assurances in law and to do all acts necessary or proper to vest, perfect or confirm title to and possession of such rights, properties or assets in the Surviving Association and otherwise to carry out the purposes of this Plan; and the proper officers and directors of the Surviving Association are fully authorized in the name of Richardson or otherwise to take any and all such action.

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

The Richardson Company
1818 Market Street, Ste. 2800
Philadelphia, PA 19103-3629

Re: Required Submission of Information
Safety Light Corporation Superfund Site
Bloomsburg, Pennsylvania

Dear Sir/Madam:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of release, of hazardous substances, pollutants or contaminants into the environment at the Safety Light Corporation Site, which is a former manufacturing facility occupying approximately 2 acres of a 10-acre property adjacent to the Susquehanna River off Old Berwick Road, Bloomsburg, Columbia County, Pennsylvania (hereafter known as the "Site" or "Facility"). This information request addresses all periods of ownership and operation of any of Safety Light's predecessor or affiliated companies including, but not limited to, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation and Shield Source Incorporated. Safety Light Corporation most recently used tritium in the manufacture of self-illuminated signs. Past disposal practices at the Site have resulted in the release of radionuclides including, but not limited to, Radium 226 and tritium into on-site soils and groundwater.

Documents obtained from the United States Radium Corporation/Safety Light Corporation suggest that a business arrangement existed between the Safety Light Corporation and The Richardson Company in at least the 1960s. Based on these documents, EPA believes that The Richardson Company may have arranged for the disposal of items containing radionuclides at the Safety Light Site. These documents, which may assist you in your research, are enclosed with 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. Section 9604(e), EPA has the authority to require The Richardson Company (the terms "you," and "Respondent" mean The Richardson Company, hereinafter "TRC") 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), and pollutants and/or contaminants as defined by Section 101(33), 42 U.S.C. Section 9601(33), which were transported to, stored, treated, or disposed of at the above-referenced Facility. Please provide the specific information set forth below, under "Information Requested," for the time period 1945 to the present. EPA recognizes that this request spans a significant period of time and appreciates your cooperation.

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.

Instructions for responding to this required submission of information follow:

INSTRUCTIONS

1. You may be 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 1, *Business Confidentiality Claims/Disclosure to EPA Contractors & Grantees of Your Response*. You must clearly mark such information by either stamping or using any other form of notice that such information is 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.

2. Please provide a separate, detailed narrative response to each question, and to each subpart of a 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 by the number of the specific question(s) or subpart of the question(s) to which it 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, which are defined in CERCLA, shall have the meaning set forth in CERCLA. Definitions of several such terms are set forth in Enclosure 2, *Definitions*, for your convenience. Also, several additional terms not defined in CERCLA are defined in Enclosure 2. Those terms shall have the meaning set forth in Enclosure 2 any time such terms are used in this Information Request and/or its Enclosures.

INFORMATION REQUESTED

For the time period 1945 to the present, please answer the following questions in accordance with the Instructions set forth above.

1. Describe in detail any and all business relationship(s) between TRC and Safety Light or its affiliates, as defined above and in the enclosed Definitions.

2. Did TRC ever send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to the Site?

3. Did TRC ever send, transport or ship, or otherwise arrange for transportation or shipment of, radioactive materials or items containing radionuclides to Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation, U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation or Shield Source Incorporated?

4. If you answered "yes" to Question 2 or Question 3, please respond to the following:

   a. Provide the time period during which each such transaction occurred.

   b. Provide the purpose or reason for each such transaction.

   c. For each and every transaction, provide:

      i. the entity to which you sent radioactive materials or items containing radionuclides (i.e., Safety Light Corporation, U.S. Radium Corporation, Lime Ridge Industries, Inc., USR Industries, Inc., USR Metals, Inc., Metreal Corporation, Isolite Corporation,

U.S. Natural Resources, Inc., USR Chemical Products, Inc., USR Lighting Products, Inc., UNATCO Funding Corporation and Shield Source Incorporated);

ii. a detailed description of each radioactive material or item or type of item(s) sent and the amount of radionuclides contained within each such material or item(s);

iii. the method used to send or transport such radioactive materials or items to the Site (e.g., hauler, U.S. mail, etc.);

iii. the date(s) of the pickup and delivery of radioactive material or item(s) containing radionuclides;

iv. all documents relating to the transaction, including but not limited to invoices, and correspondence regarding the type, amount, and transportation/disposal of the radioactive material or item(s) containing radionuclides to the Site;

v. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other persons or parties that have documentation or information pertaining to the transportation/disposal of radioactive material or item(s) containing radionuclides to the Site, and/or to the entities identified in Question 3.

d. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of radioactive material or item(s) containing radionuclides, explain these arrangements and provide all documentation relating to those transactions. In addition, please identify:

i. the persons with whom you, or other such persons, made such arrangements;

ii. every date on which such arrangements took place;

iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;

iv. the persons who selected the Site as the place at which materials were disposed or treated;

v. the names of employees, officers, owners, and agents for each transporter.

e. For each and every instance in which you/your company arranged for radioactive material to the Site, identify:

i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and

ii. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, and/or ship materials to the Site.

iii. the names, titles, and areas of responsibility of any persons, including all TRC employees, present and former, who were involved in or would have knowledge of such arrangements.

f. Describe any permits or applications and any correspondence between TRC and any regulatory agencies regarding materials transported to or disposed of at the Site.

g. Provide copies of any correspondence between TRC and any third party regarding materials transported to or disposed of at the Site.

h. Provide the identity of, and copies of any documents relating to, any other person who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such materials to the Site.

i. Provide the identities of all predecessors-in-interest who, during the period 1945 to the present, transported to or stored, treated, or otherwise disposed of any materials at the Site and describe in detail the nature of your predecessor-in-interest's business.

5. Did TRC ever generate other waste(s), not described in response to Questions 2 or 3, above, that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal or Isolite at the Site? If yes, please provide a detailed description of such other waste(s) and any and all related documentation.

6. For each question above, provide the name, title, area of responsibility, current address, and telephone number of all persons consulted in preparation of the answers, or who supplied documents reviewed or relied upon in the course of preparing your answers.

7. If you have reason to believe there may be persons able to provide more detailed or complete responses to any question contained herein, or who may be able to provide additional responsive documents, provide the names, titles, areas of responsibility, current addresses, and telephone numbers of such persons as well as additional information or documents they may have.

8. If you have any other information about other party(ies) who may have information that may assist the Agency in its investigation of the Site, 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, 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.

9. 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 pertinent records or documents were destroyed or are missing, provide us with the following:

   a. Your document retention policy;

   b. A description of how the records were 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 by 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.

You must respond in writing to this required submission of information within **30 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:

Harry R. Steinmetz (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 request for information please contact Harry Steinmetz at (215) 814-3161. Legal questions can be referred to Humane Zia at (215) 814-3454.

Sincerely,

Joanne L. Marinelli
Chief, Cost Recovery Branch

cc: Humane Zia, Esq. (EPA)
Mitch Cron (EPA)
Jeff Whitehead (PADEP)

Enclosures:

Enclosure 1: Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees

Enclosure 2: Definitions

Enclosure 3: List of Contractors That May Review Your Response

Enclosure 4: United States Radium Corporation Documents

Enclosure 1

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 3) 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 3, you must notify EPA in writing at the time you submit such documents.

Enclosure 2

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.

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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

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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 3

[rev. 10/2011]

List of Contractors That May Review Your Response

Emergint Technologies, Inc.
Contract # EP-W-11-025

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

CDM-Federal Programs Corporation
Contract # EP-S3-07-06
Subcontractors: L. Robert Kimball & Associates Inc.
Page Technologies 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
MacRae & Company, Inc.

Guardian Environmental Services
Contract # EP-S3-07-02
Subcontractor: Aerotech, Inc.
Guardian Equipment

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

Kemron
Contract # EP-S3-07-03
Subcontractor: Clean Venture/Cycle Chem Inc.
CMC Inc.
Los Alamos Technical Assoc., Inc.
Carlucci Construction

Weston Solutions
Contract #EP-S3-1005

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

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

WRS Infrastructure & Environment, Inc.
Contracts # EP-S3-07-01 and #EP-S3-07-09
Subcontractors: AEG Environmental
Environmental Staffing
Veolia Environmental Services
Lewis Environmental Group

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# CQ-833987

Enclosure 4

United States Radium Corporation Documents

PLANT: TWX USRC-BLBG-717-784-2447
717-784-3510
BLOOMSBURG, PA

UNITED STATES RADIUM CORPORATION

MORRISTOWN, NEW JERSEY

№ 29080

ORDER DATE: 6-6-68

INVOICE DATE: 6-13-68

SHIPPED DATE: 6-12-68

INVOICE NO.: 29080

SHIPMENT NO.: 1

OUR ORDER NO.: BL-066941

SHIPPED VIA: P.P.

PACKING SLIP NO.: 13299

SOLD TO: The Richardson Co.
1300 S. 7th St.
Dekalb, Ill. 60115

SHIP TO: Attn: Mr. F. Schlosser, Jr.

TERMS: NET 30 DAYS

CUSTOMER ORDER NO.	FOB X DEST	CUSTOMER NUMBER	SALESMAN	CLASS	TAX	MIL-X-TES	COMPLETE	ROYALTY	OTHER SPECIFY
35855			13	65	1.6		X	CMC	

QUANTITY ORDERED		DESCRIPTION OF MATERIAL	U.S. RADIUM JOB NO.	UNIT PRICE	BALANCE ON ORDER	QUANTITY SHIPPED	AMOUNT
1	1	POLONIUM-210 AIR GUN.		15.00 lot	Cust Field Dist.		15.00
		DISPOSAL.					
	2	Provide shipping container, for customer return of unit.					
	3				Shlg Chg		.66
		EXEMPT COMMISSION DOLLARS #1	#2		#3	TOTAL	15.66

E. ACCOUNTING INVOICE COPY

FORM NO. 30-16

THIS IS TO CERTIFY THAT THE MERCHANDISE LISTED IN THIS INVOICE HAS BEEN PRODUCED IN ACCORDANCE WITH THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.

jrn

DEPT. NO. Lab. 65

SL001528

UNITED STATES RADIUM CORPORATION

MORRISTOWN, NEW JERSEY

SOLD TO: The Richardson Co.
1300 S. 7th St.
Dekalb, Ill. 60115

ORDER DATE: 6-6-68
INVOICE DATE:
SHIPPED DATE:
INVOICE NO.:
SHIPMENT NO.: 1
OUR ORDER NO.: BL-066941
SHIPPED VIA:
PACKING SLIP NO.:

SHIP TO: Attn: Mr. F. Schlosser, Jr.

TERMS: NET 30 DAYS

CUSTOMER ORDER NO.	FOB-X COST	CUSTOMER NUMBER	SALESMAN	CLASS	TAX	MIL-X YES	COMPLETE	ROYALTY- CMC	OTHER SPECIFY
35855			13	65	1-6				

QUANTITY ORDERED	ITEM	DESCRIPTION OF MATERIAL	U.S. RADIUM JOB NO.	UNIT PRICE	BALANCE ON ORDER	QUANTITY SHIPPED	AMOUNT
1	1	POLONIUM-210 AIR GUN.		15.00 lot		Cont'R, Labels + Inst.	
		DISPOSAL.					
	2	Provide shipping container, for customer return of unit.					
	3						
						TOTAL	

jrn DEPT. → Lab. 65

DATE ENTERED	INSPECTION REQUIRED	ART SCHEDULE	PROOF SENT	PROOF APPROVED	REQUIRED PROOF DATE	ORDER DATE	REQUIRED DATE
6-11-68	via P.P. (container).				ltr. quote		5-20-68

MATERIALS: SOURCE & SUPPLY

ITEM 1

ITEM 2

ITEM 3

MASTER:

TOOLS: SOURCE & SCHEDULE

SCHEDULE OF SHIPMENTS

ship container
6-13-68

REMARKS OR SPECIAL INSTRUCTIONS:

F. Schlosser, Jr.

SHIPMENTS

DATE	ITEM	P.T. NO.	INVOICE NO.	QUANTITY	DATE	ITEM	P.T. NO.	INVOICE NO.	QUANTITY	DATE	ITEM	P.T. NO.	INVOICE NO.	QUANTITY

FORM NO. 39-1

5. PLANT MANAGER ORDER COPY

ssap

SL001529

THE RICHARDSON COMPANY
OR SUBSIDIARY
AS IDENTIFIED BY ADDRESS CODE *

BL 066941

JUN 11 1968

TO: UNITED STATES RADIUM CORPORATION
4150 OLD BERWICK ROAD
BLOOMSBURG, PENNSYLVANIA 17815

LAB CNS 13

PURCHASE ORDER

35035

MAIL INVOICE TO ADDRESS CODE: 10	SHIP TO ADDRESS CODE: 10
PURCHASE ORDER DATE: JUNE 6, 1968	SHIPPING DATE: SOON AS POSSIBLE
TERMS: NET 30 DAYS	VIA: BEST WAY
[ ] TAX EXEMPT [XX] TAXABLE	F.O.B. [ ] DESTINATION [X] SHIPPING POINT
FREIGHT TERMS [ ] PREPAID AND ALLOWED	[ ] COLLECT [ ] DELIVERED [X] PREPAID AND ADD ON

* SEE REVERSE SIDE FOR KEY TO ADDRESS CODES

VENDOR NO.

QUANTITY	UNIT	PART NO.	DESCRIPTION	PRICE	UNIT	DISC.
			YOU ARE TO PROVIDE PROPER SHIPPING CONTAINER FOR SHIPPING AND DISPOSAL SERVICE FOR ONE (1) POLONIUM 210 AIR GUN	15.00	NET	
			PER YOUR LETTER DATED 5/20/68 SIGNED BY MR. F. PALMER, JR.			

1

INQUIRIES REGARDING THIS ORDER SHOULD BE DIRECTED TO ▶ AUTHORIZED AGENT FOR PURCHASER Frederick Schlosser Jr. LOCATED AT 10 * 10 PURCHASER

THE TERMS AND CONDITIONS ON THE REVERSE SIDE ARE AN INTEGRAL PART OF THIS PURCHASE ORDER

SL001530

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL™

7009 2820 0000 5809 3894

UNITED STATES POSTAGE
PITNEY BOWES
02 1P $ 007.20⁰
0003155169
MAILED FROM ZIP CODE 19103

RICHARDSON
THE POWER TO SELL
1818 Market Street, Suite 2800
Philadelphia, PA 19103

Harry R. Steinmetz (3HS62)
U.S. Environmental Protection Agency, Region III
1650 Arch Street
Philadelphia, PA 19103-2029

SEP 10 2012