

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION IV

IN THE MATTER OF:

AQUA-TECH ENVIRONMENTAL, INC., SITE

Proceeding under Sections 122(g)
of the Comprehensive Environmental
Response, Compensation, and
Liability Act of 1980, as amended,
42 U.S.C. § 9622(g)

ADMINISTRATIVE ORDER
ON CONSENT

U.S. EPA Docket
No. 95-24-C

I. JURISDICTION

A. This Administrative Order on Consent ("AOC") is issued pursuant to the authority vested in the President of the United States by Section 122(g) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 ("CERCLA"), Pub. L. No. 99-499, 42 U.S.C. § 9622(g), to reach settlements in actions under Section 107(a) of CERCLA, 42 U.S.C. § 9607(a). The authority vested in the President of the United States has been delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order 12580, 52 Fed. Reg. 2923 (January 29, 1987) and re-delegated to the Regional Administrator of EPA, Region IV, by EPA Delegation No. 14-14-E (issued September 13, 1987, amended by memorandum June 17, 1988) and further re-delegated to the Director, Waste Management Division.

B. This AOC is issued to the de minimis respondents ("Respondents") identified in Appendix A. The Respondents agree to undertake all actions required by the terms and conditions of this AOC. The Respondents further consent to and will not contest EPA's jurisdiction to issue this AOC or to implement or enforce its terms.

II. STATEMENT OF FACTS

A. The Aqua-Tech Environmental, Inc. site (the "Site"), is located on County Road 47-644 near its intersection with South Carolina Highway 290, approximately five (5) miles east of Greer, South Carolina.

B. The Site was a hazardous waste treatment, recycling, reclamation and storage facility (the "Facility") which accepted many types of hazardous wastes.

from off-site sources.

C. From approximately 1976 to 1987, Groce Laboratories owned and operated the Facility. Aqua-Tech Environmental, Inc. purchased the Facility on April 30, 1987, and operated the company under the name "Aqua-Tech/Groce Laboratories" from that date until 1990. Thereafter, the name of company was changed to "Aqua-Tech Environmental, Inc."

D. The Site consists of 180 acres bordered on the north by a Southern Railroad line, to the west by privately owned farmland, to the south by privately owned woodland, and to the east by State Highway 644. Three residences are located approximately 300 feet east of the Site and several other homes are located approximately 300 feet northwest of the Site. There are also nearby residences and business establishments located on South Carolina Highway 47-644 and in the towns of Greer, South Carolina and Duncan, South Carolina.

E. The Facility submitted its initial notification of hazardous waste activity to the South Carolina Department of Health and Environmental Control ("DHEC") in October 1979. The Facility operated under "Interim Status" under the Resource Conservation and Recovery Act (RCRA) by virtue of the Facility's RCRA Part A application submitted on November 15, 1980, to South Carolina. A revised Part A Application was filed April 16, 1981. In October 1987, the Facility submitted an Original Part B Application to South Carolina, and in September 1987, the Facility submitted a revised Part B application. These applications were denied by South Carolina.

F. The Facility accepted for treatment, storage, and/or disposal acids, oxidizers, poisons, reactive, corrosives, explosives, flammables, shock sensitive materials, cyanides and arsenic wastes, halogenated and nonhalogenated organics and other hazardous wastes. The Facility's primary operations consisted of the processing of laboratory pack materials, the recovery of metals (primarily off-specification ammunition), the processing of compressed gas cylinders, the management of containers storing hazardous materials, the neutralization of acids and bases, and the blending of fuels.

G. South Carolina DHEC and EPA Region IV's RCRA program inspected the Facility on numerous occasions during the 1980's and noted a number of violations of state and federal laws and regulations. On December 28, 1982, Groce Laboratories entered into its first Administrative Order on Consent with South Carolina DHEC to address regulatory violations at the site. Thereafter, the owners of the Facility entered into five additional Consent Orders with South Carolina DHEC from 1985 through 1991, each of which addressed numerous operating and record-keeping violations at the Facility. Repeated deficiencies noted by South Carolina DHEC and EPA during the inspections included the unpermitted discharge of hazardous materials into the environment, the storage of hazardous waste in unpermitted areas, unmarked containers of hazardous waste, hundreds of waste containers being stored in violation of applicable land disposal restrictions, and the accumulation of rain water in such a manner as to permit its contact with hazardous materials.

H. On August 4, 1983, a fire occurred at the process/distillation area of the Facility. During the fire, approximately 500 gallons of dirty heptane, 50 gallons of toluene, and 200 gallons of methyl alcohol burned, and waste was released into the environment.

I. On March 4, 1990, a 55-gallon drum of elemental phosphorous caught fire at the Facility. A fireman responding to the fire was overcome by a dense cloud of smoke generated by the fire and ninety people were evacuated. Another incident occurred when a generator sent four drums of off-specification ignitor sustainer mixtures to the Facility. While repacking the material on April 19, 1990, two drums detonated, severely injuring two people and destroying a truck and a tow motor. On July 10, 1990, the Facility held a controlled explosion to destroy the remaining two drums, prior to which thirty-two nearby residents were evacuated for safety. On August 27, 1991, the EPA RCRA program and South Carolina DHEC jointly inspected the Facility and found the following conditions: (1) the solvent recovery containment area held potentially contaminated water collected from several drum storage areas (this water was approximately two feet deep, which was at the level of the storage tanks and

within several feet of overflowing the containment area); (2) numerous containers holding hazardous wastes were not closed; (3) containers were leaking or were deteriorating; (4) containers were warmer than other metal containers on the compatible acid storage pad, indicating an exothermic reaction with contaminated rainwater; (5) a container of phosphorous trichloride was reacting and releasing hazardous gas. The inspectors also observed hundreds of gas cylinders, containing hazardous materials, poisons and freon, in varying deteriorating conditions about the site. During the inspection, Aqua-Tech personnel reported that an employee had been overcome by fumes and seriously injured in the reactive area while unpacking laboratory materials.

J. Following the inspection described above, South Carolina DHEC issued to the Facility an Emergency and Administrative Order, No. 91-52-SW, under which South Carolina DHEC determined that Aqua-Tech had failed to operate the Facility in compliance with South Carolina laws and regulations and with Administrative Orders on Consent that Aqua-Tech had previously entered into with South Carolina DHEC. In the order, South Carolina DHEC determined that the site was an uncontrolled hazardous waste site, revoked the site's interim status, and ordered it immediately to cease receiving, shipping, recycling and treatment activities. Thereafter, South Carolina DHEC denied the Facility's Part B application.

K. On September 12, 1991, South Carolina DHEC requested the assistance of EPA in addressing the contamination at the site. As a result of the release or threatened release of hazardous substances into the environment, EPA undertook emergency removal actions to stabilize the site pursuant to Section 104 of CERCLA, 42 U.S.C. § 9604. Subsequently, on April 24, 1992, EPA issued a Unilateral Administrative Order (UAO) pursuant to Section 106 of CERCLA, 42 U.S.C. § 9606, to 98 parties which required those parties to undertake removal activities at the site. The recipients of the UAO formed a Steering Committee (the "Aqua-Tech Steering Committee") to coordinate site activities. In June 1992, removal activities were assumed by RMT, Inc., a cleanup contractor.

retained by the Steering Committee. The removal cleanup proceeded with EPA oversight and assistance through January, 1994. During the course of the removal cleanup activities, a total of 1,343 lab packs were inventoried, unpacked, segregated and disposed of, a total of 5,632 drums were repacked for disposal and disposed of, and a total of 1,273 cylinders were treated on site.

L. In performing the removal actions and oversight activities, EPA incurred response costs at or in connection with the Site. In the future, EPA may perform additional removal or remedial response actions to provide protection to human health and the environment. Past response costs incurred by EPA as of March 8, 1995, total \$1,925,504.25. Of EPA's total past response costs, \$722,413.09 has been apportioned to gas cylinder removal.

M. Each of the Respondents arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, of a hazardous substance owned or possessed by such Respondent at the Site, or accepted a hazardous substance for transportation to the Site.

N. All of the Respondents sent waste to the site which was contained in gas cylinders. At this time, all gas cylinders have been removed from the surface of the Site. Other gas cylinders, yet to be discovered, might remain buried beneath the surface of the Site. A premium is included in this Agreement to address possible future costs associated with other response actions, if any, related to gas cylinders at the Site. Therefore, this AOC resolves the liability of the Respondents for EPA's past response costs which have been apportioned to gas cylinders and for all future liability relating to gas cylinders at the site.

P. Each of the Respondents is de minimis because (i) the amount of hazardous waste contributed to the Site by each such party is minimal in comparison to the total amount of hazardous waste which was sent to the Site, and (ii) the hazardous substances contributed by each such party are not significantly more toxic or of significantly greater hazardous effect than other hazardous substances at the Site. For purposes of this settlement, a party sent a minimal amount of hazardous waste to the Site if that party's

contributions to the Site do not exceed 30,000 pounds.

III. DEFINITIONS

Unless otherwise expressly provided herein, terms used in this Administrative Order on Consent which are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in CERCLA or in such regulations. Whenever terms listed below are used in this Administrative Order on Consent or in any appendix attached hereto, the following definitions shall apply:

"Administrative Order on Consent" or "AOC" shall mean this document and any attached appendices.

"CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §§ 9601 et. seq.

"EPA" shall mean the United States Environmental Protection Agency and any successor departments or agencies of the United States.

"Future Response Costs" shall mean all costs of response, including but not limited to direct and indirect costs, incurred or to be incurred in connection with the Site after October 31, 1994.

"Future Cylinder Response Costs" shall mean all Future Response Costs relating to gas cylinders including, but not limited to, for example, the removal of buried cylinders.

"Parties" shall mean the United States and each and every Respondent.

"Past Response Costs" shall mean all costs, including but not limited to direct and indirect costs, that the United States has incurred through October 31, 1994, for response activities relating to the Aqua-Tech Site.

"Past Cylinder Response Costs" shall mean all Past Response Costs which have been apportioned to gas cylinders.

IV. DETERMINATIONS

1. Based upon the Findings of Fact set forth above and on the administrative record for this Site, EPA has determined that:

A. The Site is a "facility" as that term is defined in Section 101(9) of CERCLA, 42 U.S.C. § 9601(9);

B. Each of the Respondents is a "person" as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21);

C. Each of the Respondents is a "potentially responsible party" under Sections 107(a) of CERCLA, 42 U.S.C. §§ 9607(a); and

D. There has been an actual or threatened "release" of hazardous substance from the site as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. § 9601(22).

2. Based on the Administrative Record, the requirements of Section 122(g) of CERCLA, 42 U.S.C. § 9622(g) are satisfied with respect to the Respondents because:

A. Prompt settlement with each of the Respondents is practicable and in the public interest in accordance with Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1); and

B. In accordance with Section 122(g)(1) of CERCLA, 42 U.S.C. § 9622(g)(1), the amount of hazardous substances contributed to the site by each of the Respondents is minimal in comparison to other hazardous substances at the site, and the hazardous substances contributed to the site by each of the Respondents is no more toxic and is not of significantly greater hazardous effect than other hazardous substances at the site.

V. ORDER

Based upon the administrative records for this site, the Findings of Fact and Determinations set forth above, and in consideration of the promises and covenants set forth herein, it is hereby AGREED TO AND ORDERED:

A. PAYMENTS BY RESPONDENTS

1). Within sixty (60) days of the effective date of this AOC, each of the Respondents shall pay to EPA, that party's share of EPA's Past Cylinder Response Costs, including oversight costs and orphan costs, incurred by the United States at or in connection with the site, together with a non-reimbursable premium which is intended to cover the risk that there may be Future Cylinder Response Costs at the site. Appendix B sets forth the payments to be made to EPA by each of the Respondents. Nothing herein shall affect or

limit any reimbursement arrangement relating to the Site entered into by any Respondent and any other party.

2). Each payment to EPA shall be made by certified check or cashier's check made payable to "EPA-Hazardous Substance Superfund." Each check shall reference the Site name, the name and address of the Respondent, and the EPA docket number for this action, and shall be sent to:

U.S. Environmental Protection Agency
Region IV
Attn: Superfund Accounting
P.O. Box 100142
Atlanta, Georgia 30384

3). Respondents shall simultaneously send a copy of their checks and transmittal letters to:

Ms. Kim-Thu Dao Vu
U.S. Environmental Protection Agency, Region IV
Waste Programs Branch/Cost Recovery Section
345 Courtland Street, N.E.
Atlanta, Georgia 30365

B. CERTIFICATION OF RESPONDENTS

Each of the Respondents certifies individually that, to the best of its knowledge and belief, it has conducted a thorough, comprehensive, good faith search for documents and has fully and accurately disclosed to EPA all information currently in its possession, or in the possession of its officers, directors, employees, contractors or agents, which relates in any way to the ownership, operation, generation, treatment, transportation, storage or disposal of hazardous substances at or in connection with the Site. Each of the Respondents further certifies, individually, that it has not altered, mutilated, discarded, destroyed or otherwise disposed of any records, documents, or other information relating to its potential liability regarding the Site since notification of potential liability or the filing of a suit against that Respondent regarding the Site and that it has fully complied with any and all requests from EPA for information pursuant to Sections 104(e) and 122(e) of CERCLA, 42 U.S.C. §§ 9604(e) and 9622(e), and Section 3007 of the Resource Conservation and Recovery Act, as amended, 42 U.S.C. § 6927.

C. COVENANTS NOT TO SUE BY UNITED STATES

In consideration of the payments that will be made by the Respondents under the terms of this AOC, and except as specifically provided in Section V, Paragraph D of this AOC (Reservation of Rights), the United States covenants not to sue or take administrative action pursuant to Section 106(a) or 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) or 9607(a) and Section 7003 of the Resource Conservation and Recovery Act, as amended, 42 U.S.C. § 6973 against any of the Respondents with regard to liability for EPA's Past Cylinder Response Costs and all future liability relating to cylinders, including Future Cylinder Response Costs. These covenants not to sue shall take effect with respect to each of the Respondents upon payment of the amounts required by Section V, Paragraph A of this AOC. With respect to each of the Respondents, these covenants not to sue are conditioned upon the complete and satisfactory performance by that party under this AOC. These covenants not to sue extend only to the Respondents and not to any other person.

D. RESERVATIONS OF RIGHTS AS TO RESPONDENTS

1. The covenants by the United States do not pertain to any matters other than those expressly set forth in Section V, Paragraph C of this AOC. Nothing in this AOC is intended to be nor shall it be construed as a release or covenant not to sue for any claim or cause of action, past or future, at law or in equity, which the United States, including EPA, may have against any of the Respondents for:

- a) claims based on a failure to make payments required by Section V, Paragraph A, of this AOC;
- b) any liability resulting from a violation of this AOC;
- c) criminal liability;
- d) liability for damages for injury to, destruction of, or loss of natural resources;
- e) liability arising from the past, present, or future disposal, release, or threat of release of hazardous substances outside of the site; and

f) liability for non-cylinder related hazardous substances at the Site, including liability for all costs of response incurred or to be incurred in connection with the Site other than EPA's Past Cylinder Response Costs and Future Cylinder Response Costs.

2. Nothing in this AOC constitutes a covenant not to sue or to take action or otherwise limits the ability of the United States, including EPA, to seek or obtain further relief from any of the Respondents, and the covenants by the United States set forth in Section IV, Paragraph C hereof are null and void with respect to any Respondent, if information not currently known to EPA is discovered which indicates that any Respondent contributed hazardous substances to the Site in such greater amount or of such greater toxic or other hazardous effect that the Respondent no longer qualifies as a de minimis party under this AOC.

3. Except as specifically agreed to herein, the United States retains all authority and reserves all rights to take any and all response actions authorized by law.

E. COVENANT NOT TO SUE BY RESPONDENTS

The Respondents covenant not to sue and agree not to assert any claims or causes of action against the United States concerning EPA or its contractors or employees with respect to the site or this AOC, through Sections 106(b)(2), 107, 111, 112, or 113 of CERCLA, 42 U.S.C. §§ 9606(b)(2), 9607, 9611, 9612, or 9613, or any other provision of law, or any claims arising out of response activities at the Site. Nothing in this AOC shall be deemed to constitute preauthorization of a claim within the meaning of Section 111 of CERCLA, 42 U.S.C. § 9611, or 40 C.F.R. 300.700(d).

F. EFFECT OF SETTLEMENT; CONTRIBUTION PROTECTION

1. Nothing in this AOC shall be construed to create any rights in, or grant any cause of action to, any person who is not a party to this AOC. The preceding sentence shall not be construed to waive or nullify any rights that any person not a signatory to this AOC may have under applicable law. The

United States, including EPA, and the Respondents each reserve any and all rights (including, but not limited to, any right of contribution), defenses, claims, demands, and causes of action which each party may have with respect to any matter, transaction, or occurrence relating in any way to the site against any person not a party hereto. Nothing herein shall effect the contribution protection provisions of any agreement between the United States and the Aqua-Tech PRP Group or any contribution protection the United States may be entitled to under CERCLA or other federal law.

2. EPA and the Respondents agree that the terms and conditions of this AOC and any actions undertaken by the Respondents in accordance with this AOC, do not constitute an admission of any liability by any Respondent. The Respondents do not admit and retain the right to controvert in any subsequent proceedings, other than proceedings to implement or enforce this AOC, the validity of the Statement of Facts or Determinations contained in this AOC.

3. With regard to claims for contribution against each of the Respondents for matters addressed by this AOC, the Parties hereto agree that each of the Respondents is entitled, as of the effective date of this AOC, to such protection from contribution actions or claims as is provided by Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(g)(5). Such protection with respect to each Respondent is conditioned upon that Respondent's compliance with the requirements of this AOC. Matters addressed shall not include liability of any Respondent to the Aqua-Tech Steering Committee for response costs incurred in connection with the site prior to the effective date of this AOC. Moreover, matters addressed shall not include any liability to the State of South Carolina for site related response costs incurred by the State of South Carolina prior to the effective date of this AOC.

G. PARTIES BOUND

This AOC shall apply to and be binding upon EPA and upon the Respondents and their heirs, successors and assigns. Any change in ownership or corporate status of a Respondent including, but not limited to, any transfer of assets or

real or personal property, shall in no way alter such Respondent's responsibilities under this AOC. Each signatory to this AOC represents that he or she is fully authorized to enter into the terms and conditions of this AOC and to legally bind the Respondent represented by him or her.

H. CIVIL PENALTIES

In addition to any other remedies or sanctions available to EPA, any Respondent who fails or refuses to comply with any term or condition of this AOC shall be subject to a civil penalty of up to \$25,000 per day of such failure or refusal pursuant to Section 122(1) of CERCLA, 42 U.S.C. § 9622(1).

I. PUBLIC COMMENT

This AOC shall be subject to a thirty day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. § 9622(i)(3), EPA may withdraw or modify consent to this AOC if comments received disclose facts or considerations which indicate that this AOC is inappropriate, improper, or inadequate.

J. ATTORNEY GENERAL APPROVAL

The Attorney General or her designee has issued prior written approval of the settlement embodied in this AOC in accordance with Section 122(g)(4) of CERCLA, 42 U.S.C. §9622(g)(4).

K. EFFECTIVE DATE

The effective date of this AOC shall be the date upon which EPA issues written notice to the Respondents that the public comment period pursuant to Paragraph V.J. of this AOC has closed and that comments received, if any, do not require modification of or EPA withdrawal from this AOC.

IT IS SO AGREED AND ORDERED:

U.S. Environmental Protection Agency

BY: Joseph R. Franzmathes
Joseph R. Franzmathes
Director, Waste Management Division

JUL 21 1985

Date

APPENDIX A
AQUA-TECH ENVIRONMENTAL, INC. SITE
GREER, SOUTH CAROLINA
DE MINIMIS POTENTIALLY RESPONSIBLE PARTIES
07/21/95

1. AEROJET
2. ALZA Corporation
3. American Health Foundation
4. American Recovery Company
5. Anheuser-Busch Co., Inc.
6. Arts High School
7. Ball Corporation
8. Battelle
9. Beazer Materials
10. Beecham Laboratories
11. Bell Helicopter Textron, Inc.
12. Borg Warner
13. Bush, Boake, Allen, Inc.
14. Carnegie-Mellon University
15. Catalyst Research
16. Catholic University
17. Chemical Waste Management
18. Chevron Chemical Company
19. Chrysler Corporation
20. City of Baltimore
21. College of William and Mary
22. Conrail-Technical Service Lab
23. Delaware State University
24. Dowzer Electric
25. DuPont Critical Care
26. Eastman Kodak Co.
27. Ecolab Center
28. Elf Atochem/Pennwalt Corporation
29. Energy Technology
30. Englehard Industries
31. GSX Incorporated
32. GTE Communications
33. General Mills, Inc.
34. Gillette Research
35. Gollob Analytics Services
36. The Goodyear Tire & Rubber Co.
37. Hazleton Laboratories
38. Hillsborough County Schools
39. Hughes Research Lab
40. International Business Machines
41. James River Graphics
42. Johns Hopkins Hospital
43. Johns Hopkins University
44. Kennametal, Inc.
45. Kraft, Inc.
46. Lehman College
47. Liquid Carbonic Specialty Gas Corp.
48. Loral Systems Group
49. Loyola College
50. Mallinckrodt Chemical, Inc.
51. Miami University
52. Monsanto
53. Morton Thiokol, Inc.
54. New York Air Brake
55. Norfolk Southern Railroad
56. Northrup King Co.
57. Norton Company
58. Nuodex, Inc.
59. Occidental Chemical Corp.
60. Ocean County Justice Complex
61. The Ohio State University
62. Owens Corning Fiberglass
63. Pennsylvania State University
64. Pharmacia P-L Biochemicals
65. Pierce and Stevens
66. Radiac Research Corp.
67. Ralston Purina
68. Reichhold Chemicals
69. Rider University
70. Rust-Oleum Corp.
71. Samsel Services Company
72. San Jose State University
73. Scovill, Inc.
74. Sherwin Williams
75. State of Michigan - DOT
76. Texaco Research Center
77. USI Chemical
78. Unisys Corporation
79. United Technologies Research
80. University of California
81. University of Denver
82. University of Florida
83. University of Louisville
84. University of Nebraska
85. University of Wisconsin-Madison
86. Vista Chemical
87. Wesley College
88. Wesley-Jessen
89. Western Illinois University
90. Westinghouse Electric Corp. LRA
91. Westvaco Corporation
92. Winston Churchill High School
93. Wisconsin DOJ/State Crime Lab
94. Worcester Foundation/Experiment Biology
95. Wright State University
96. Zenith Electronics Corporation

ENFORCEMENT CONFIDENTIAL

APPENDIX B

Summary of Payables to EPA

Name2	EPA PAST COST SHARE PERCENTAGE	CYLINDER ORPHAN PERCENTAGE	CYLINDER Share of EPA PAST COSTS	CYLINDER PREMIUM	TOTAL PAYABLE TO EPA
AEROJET GENERAL CORP.	0.1313%	0.3720%	\$948.65	\$4,632.13	\$5,580.78
ALLEN BRADLEY	0.0808%	0.2289%	\$583.78	**	**
AMERICAN CYANAMID CO.	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
AMERICAN HEALTH FOUNDATION	0.2179%	0.4292%	\$1,573.83	\$5,344.76	\$6,918.59
AMOCO	0.1977%	0.3720%	\$1,427.88	**	**
ANHEUSER-BUSCH, INC.	0.3434%	0.9728%	\$2,481.08	\$12,114.80	\$14,595.88
BARBER COLEMAN	0.0101%	0.0286%	\$72.97	**	**
BATELLE LABS	3.1132%	0.3433%	\$22,490.25	\$4,275.81	\$26,766.06
BEAZER	1.4419%	0.6867%	\$10,416.30	\$8,551.62	\$18,967.92
BELL AEROSPACE TEXTRON	0.8490%	0.0286%	\$6,133.33	\$3,000.00	\$9,133.33
BORG-WARNER	0.0505%	0.1431%	\$364.87	\$3,000.00	\$3,364.87
CATALYST RESEARCH	0.1959%	0.0572%	\$1,415.35	\$3,000.00	\$4,415.35
CATHOLIC UNIVERSITY	0.3874%	0.0000%	\$2,798.39	\$3,000.00	\$5,798.39
CHEMICAL ANALYTICS, INC.	0.2828%	0.8011%	\$2,043.25	**	**
CHEMICAL WASTE MANAGEMEN	1.0181%	1.8884%	\$7,354.80	\$23,516.96	\$30,871.75
CHEVRON CHEMICAL COMPANY	1.7142%	0.0572%	\$12,383.56	\$3,000.00	\$15,383.56
CHEVRON RESEARCH	2.7188%	1.5451%	\$19,640.82	\$19,241.15	\$38,881.97
CHRYSLER CORPORATION	0.0404%	0.1144%	\$291.89	\$3,000.00	\$3,291.89
CITY OF BALTIMORE	0.0404%	0.1144%	\$291.89	\$3,000.00	\$3,291.89
CONSOLIDATED RAIL CORPORAT	0.8066%	0.0000%	\$5,826.79	\$3,000.00	\$8,826.79
DOWZER ELECTRIC	0.6629%	0.2289%	\$4,788.93	\$3,000.00	\$7,788.93
ECONOMICS LABORATORIES	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
EI DUPONT	0.5920%	0.0286%	\$4,276.36	\$3,000.00	\$7,276.36
ENGELHARD	0.3917%	0.2575%	\$2,829.35	\$3,206.86	\$6,036.21
FEDERAL FACILITIES	29.7081%	51.7309%	\$214,615.38	**	**
GENERAL ELECTRIC	0.2222%	0.6295%	\$1,605.41	**	**
GENERAL MILLS, INC.	1.7778%	0.8298%	\$12,843.38	\$10,333.21	\$23,176.59
GILLETTE RESEARCH	0.1671%	0.4292%	\$1,207.10	\$5,344.76	\$6,551.86
GOODYEAR TIRE & RUBBER CO	0.0404%	0.1144%	\$291.89	\$3,000.00	\$3,291.89
GREENVILLE COUNTY SCHOOLS	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
GSX	0.0303%	0.0858%	\$218.92	\$3,000.00	\$3,218.92
GTE OPERATIONS SUPPORT INC	0.0404%	0.1144%	\$291.89	\$3,000.00	\$3,291.89
HILLSBOROUGH COUNTY SCHOO	0.3672%	0.2003%	\$2,652.75	\$3,000.00	\$5,652.75
JAMES RIVER CORPORATION	0.0404%	0.1144%	\$291.89	\$3,000.00	\$3,291.89
JOHNS HOPKINS HOSPITAL	1.7955%	2.2031%	\$12,971.08	\$27,436.45	\$40,407.53
JOHNS HOPKINS UNIVERSITY	0.5362%	0.9728%	\$3,873.37	\$12,114.80	\$15,988.17
KANSAS DEPT OF HEALTH & ENVI.	0.1428%	0.0286%	\$1,031.44	**	**
KENAMETAL	0.1367%	0.0000%	\$987.36	\$3,000.00	\$3,987.36
KRAFT GENERAL FOODS	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
LOYOLA COLLEGE	0.0202%	0.0572%	\$145.95	\$3,000.00	\$3,145.95
MALLINCKRODT	0.1897%	0.1144%	\$1,370.15	\$3,000.00	\$4,370.15
MCCORMICK & COMPANY INC.	0.1111%	0.3147%	\$802.70	\$3,919.49	\$4,722.20
MIAMI UNIVERSITY	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
MILES LABS	0.1755%	0.3720%	\$1,267.99	\$4,632.13	\$5,900.11
NORFOLK SOUTHERN RAILWAY	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
NUODEX	0.0404%	0.1144%	\$291.89	\$3,000.00	\$3,291.89
OCCIDENTAL CHEMICAL CORP.	0.0917%	0.0572%	\$662.19	\$3,000.00	\$3,662.19
OHIO STATE UNIVERSITY	1.9047%	0.7441%	\$13,760.10	\$9,266.88	\$23,026.98
OHM RESOURCE RECOVERY	0.2107%	0.1144%	\$1,522.07	**	**
OWENS CORNING FIBERGLASS	0.3348%	0.0000%	\$2,418.76	\$3,000.00	\$5,418.76

Summary of Payables to EPA

Name2	EPA PAST COST SHARE PERCENTAGE	CYLINDER ORPHAN PERCENTAGE	CYLINDER Share of EPA PAST COSTS	CYLINDER PREMIUM	TOTAL PAYABLE TO EPA
PENNWALT CORP.	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
PIERCE AND STEVENS	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
RADIAC RESEARCH CORPORATI	4.9825%	0.0000%	\$35,994.18	\$3,000.00	\$38,994.18
RALSTON PURINA	0.0202%	0.0572%	\$145.95	\$3,000.00	\$3,145.95
REICHOLD CHEMICAL	0.4976%	0.0000%	\$3,594.66	\$3,000.00	\$6,594.66
SAMSEL SERVICES COMPANY	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
SHERWIN WILLIAMS	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
SPACE ORDNANCE SYSTEMS	0.1818%	0.5150%	\$1,313.52	**	**
SQUARE D	0.0101%	0.0286%	\$72.97	**	**
TEXACO RESEARCH CENTER	0.2177%	0.0858%	\$1,573.00	\$3,000.00	\$4,573.00
UNITED TECHNOLOGIES RESEAR	0.0202%	0.0572%	\$145.95	\$3,000.00	\$3,145.95
UNIVERSITY OF FLORIDA	1.9013%	0.6581%	\$13,735.30	\$8,195.30	\$21,930.60
UNIVERSITY OF WISCONSIN-MAD.	0.8439%	0.0572%	\$6,096.47	\$3,000.00	\$9,096.47
VISTA CHEMICAL	0.3593%	0.8298%	\$2,595.45	\$10,333.21	\$12,928.66
WASTE CONVERSION INC.	0.0101%	0.0286%	\$72.97	**	**
WISCONSIN DEPT. OF JUSTICE	0.1936%	0.0000%	\$1,398.31	\$3,000.00	\$4,398.31
WORCESTER FOUN.D. FOR EXPE	0.0606%	0.1717%	\$437.84	\$3,000.00	\$3,437.84
ZENITH	0.0202%	0.0572%	\$145.95	\$3,000.00	\$3,145.95
COVENTRY TWSP BOARD OF TR	0.1100%	0.0286%	\$794.37		
CYLINDER ANALYTICS, INC.	0.1100%	0.0286%	\$794.37	\$3,000.00	\$3,794.37
FLEISCHMANN KURTH MALTING	0.1214%	0.0572%	\$877.33	\$3,000.00	\$3,877.33
LAURELTON CENTER	0.5025%	0.0000%	\$3,630.33	\$3,000.00	\$6,630.33
NANTICOKE STATE HOSPITAL	0.2025%	0.2861%	\$1,462.73	\$3,563.18	\$5,025.91
NSSI RECOVERY	0.0591%	0.0000%	\$427.18	\$3,000.00	\$3,427.18
OCEAN COUNTY JUSTICE COMPL.	0.1620%	0.0286%	\$1,170.09	\$3,000.00	\$4,170.09
PENNSYLVANIA DEPT OF ENVIRO	1.3881%	0.0000%	\$10,027.75		
PSC ENVIRONMENTAL	0.5556%	1.5737%	\$4,013.52	\$19,597.47	\$23,610.98
SELINGSGROVE CENTER	0.5633%	0.0000%	\$4,069.66	\$3,000.00	\$7,069.66
STRATTEN REALTY, INC/ANCHOR	0.1519%	0.0000%	\$1,097.12	\$3,000.00	\$4,097.12
WESTERN CENTER	0.1549%	0.0000%	\$1,118.78	\$3,000.00	\$4,118.78
HAMBURG CENTER	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
NORRISTOWN STATE HOSPITAL	0.0202%	0.0572%	\$145.95	\$3,000.00	\$3,145.95
PENNSYLVANIA STATE POLICE	0.0202%	0.0572%	\$145.95	\$3,000.00	\$3,145.95
SAN JOSE STATE UNIVERSITY	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
STATE OF MICHIGAN DOT	0.0808%	0.2289%	\$583.78	\$3,000.00	\$3,583.78
NJDEP-DHWM/METRO REGION O	0.0101%	0.0286%	\$72.97		
AERR COMPANY	0.2693%	0.0286%	\$1,945.38	\$3,000.00	\$4,945.38
AMERICAN BIOGENICS	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
AMERICAN ENVIRONMENTAL MA	9.4450%	1.8598%	\$68,232.04	\$23,160.64	\$91,392.68
AQUA-TECH	8.8800%	0.0286%	\$64,150.41	**	**
CHEMSYN LABORATORIES	0.1482%	0.0000%	\$1,070.97	\$3,000.00	\$4,070.97
CYLINDER RECON COMPANY	2.4463%	2.8326%	\$17,672.32	\$35,275.44	\$52,947.76

Summary of Payables to EPA

Name2	EPA PAST COST SHARE PERCENTAGE	CYLINDER ORPHAN PERCENTAGE	CYLINDER Share of EPA PAST COSTS	CYLINDER PREMIUM	TOTAL PAYABLE TO EPA
RESOURCE TECHNOLOGY SERVI	2.5354%	7.1817%	\$18,316.24	--	--
ROBERT COLE	0.2574%	0.0000%	\$1,859.46	\$3,000.00	\$4,859.46
SHATTERPROFF GLASS CORP.	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
UNIROYAL, INC.	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
AMERICAN RED CROSS	0.0793%	0.0572%	\$573.13	\$3,000.00	\$3,573.13
BALL CORPORATION	0.1674%	0.0000%	\$1,209.62	\$3,000.00	\$4,209.62
BUSH, BOAKE, ALLEN INC.	0.0819%	0.0000%	\$591.74	\$3,000.00	\$3,591.74
CARNEGIE-MELON UNIVERSITY	0.2337%	0.2861%	\$1,688.20	\$3,563.18	\$5,251.37
CHEMICAL WASTE DISPOSAL CO	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
COLLEGE OF WILLIAM AND MAR	0.2802%	0.0286%	\$2,024.46	\$3,000.00	\$5,024.46
ENERGY TECHNOLOGY	0.1616%	0.4578%	\$1,167.57	\$5,701.08	\$6,868.65
ENSCO ENVIRONMENTAL SERVIC	0.1079%	0.0286%	\$779.42	\$3,000.00	\$3,779.42
GENESIS LAB	0.0202%	0.0572%	\$145.95	\$3,000.00	\$3,145.95
GOLLOB ANALYTICAL SERVICES	0.4344%	1.2303%	\$3,137.84	\$15,321.65	\$18,459.50
HUGHES RESEARCH LAB	0.2962%	0.1144%	\$2,139.80	\$3,000.00	\$5,139.80
LEHMAN COLLEGE	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
LORAL SYSTEMS GROUP	0.2971%	0.1717%	\$2,145.98	\$3,000.00	\$5,145.98
MORTON THIKOL	0.3060%	0.5150%	\$2,210.54	\$6,413.72	\$8,624.25
NEW YORK AIR BRAKE	0.0665%	0.0000%	\$480.29	\$3,000.00	\$3,480.29
RUST-OLEUM CORP	0.0257%	0.0286%	\$185.48	\$3,000.00	\$3,185.48
TOWSON STATE UNIVERSITY	0.0808%	0.2289%	\$583.78	\$3,000.00	\$3,583.78
UNIVERSITY OF DENVER	0.2309%	0.1144%	\$1,667.75	\$3,000.00	\$4,667.75
UNIVERSITY OF LOUISVILLE	0.7157%	0.0000%	\$5,170.51	\$3,000.00	\$8,170.51
UNIVERSITY OF MARYLAND	0.2497%	0.5150%	\$1,803.81	\$6,413.72	\$8,217.53
USI CHEMICAL	0.2363%	0.3147%	\$1,707.01	\$3,919.49	\$5,626.51
WESLEY COLLEGE	0.0909%	0.0000%	\$656.45	\$3,000.00	\$3,656.45
WESTERN ILLINOIS UNIVERSITY	0.2791%	0.0000%	\$2,016.61	\$3,000.00	\$5,016.61
WESTINGHOUSE	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
WESTVACO	0.3388%	0.0572%	\$2,447.47	\$3,000.00	\$5,447.47
JIMMY RAY PEEPLES	0.0202%	0.0572%	\$145.95	\$3,000.00	\$3,145.95
ALZA CORPORATION	0.0591%	0.0000%	\$427.18	\$3,000.00	\$3,427.18
AMERICAN NATIONAL CAN	0.1414%	0.4006%	\$1,021.62	\$4,988.45	\$6,010.07
AMERICAN RECOVERY COMPAN	0.9697%	2.7468%	\$7,005.42	\$34,206.48	\$41,211.90
ARTS HIGH SCHOOL	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
BEECHAM PRODUCTS	0.0808%	0.2289%	\$583.78	\$3,000.00	\$3,583.78
BELL HELICOPTER TEXTRON	0.2424%	0.6867%	\$1,751.35	\$8,551.62	\$10,302.97
DELAWARE STATE COLLEGE	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
EASTMAN KODAK	0.2525%	0.7153%	\$1,824.33	\$8,907.94	\$10,732.27
ETSC	0.3891%	0.0000%	\$2,811.26	\$3,000.00	\$5,811.26
HAZELTON LABORATORIES	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
INTERNATIONAL BUSINESS MAC	0.9495%	2.6896%	\$6,859.47	\$33,493.85	\$40,353.32
LIQUID CARBONIC SPECIALITY G	0.5152%	1.4592%	\$3,721.63	\$18,172.20	\$21,893.82
MEAD JOHNSON AND COMPANY	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97

Summary of Payables to EPA

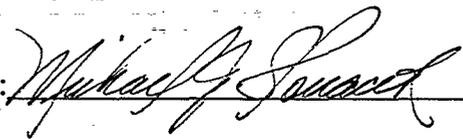
Name2	EPA PAST COST SHARE PERCENTAGE	CYLINDER ORPHAN PERCENTAGE	CYLINDER Share of EPA PAST COSTS	CYLINDER PREMIUM	TOTAL PAYABLE TO EPA
MONSANTO	0.0303%	0.0858%	\$218.92	\$3,000.00	\$3,218.92
NORTHRUP KING	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
NORTON COMPANY	0.0606%	0.1717%	\$437.84	\$3,000.00	\$3,437.84
PENN STATE UNIVERSITY	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
PHARMACIA P-L BIOCHEMICALS	0.0690%	0.0858%	\$498.19	\$3,000.00	\$3,498.19
RIDER COLLEGE	0.0202%	0.0572%	\$145.95	\$3,000.00	\$3,145.95
SCOVILLE INC.	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
UNISYS	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
UNIVERSITY OF CALIFORNIA	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
UNIVERSITY OF NEBRASKA	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
WESLEY JESSEN	0.0303%	0.0858%	\$218.92	\$3,000.00	\$3,218.92
WILSON SPORTING GOODS	0.0202%	0.0572%	\$145.95	\$3,000.00	\$3,145.95
WINSTON CHURCHHILL HIGH SC	0.0101%	0.0286%	\$72.97	\$3,000.00	\$3,072.97
WRIGHT STATE UNIVERSITY	0.1919%	0.5436%	\$1,386.49	\$6,770.03	\$8,156.52
GROCE GENERATED WASTE UNIDENTIFIED					
TOTAL	100.0000%	100.0000%	\$722,413.09	\$707,480.44	\$1,112,170.13

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Chevron Chemical Company

Executed on behalf of the above by:



Date: April 26, 1995

Name: Michael J. Slovacek

Title: Sr. Superfund Specialist

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Chevron U. S. A., Inc. as successor to Chevron Research Company

Executed on behalf of the above by:  Date: April 26, 1995

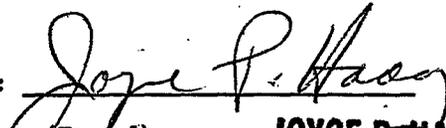
Name: Michael J. Slovacek

Title: Sr. Superfund Specialist

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Eastman Kodak Company
(Typed)

By: 
Name (Typed): JOYCE P. HAAG
Title (Typed): SECRETARY

Date: July 17, 1995

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Eastman Kodak Company
(Typed)

TJD

By: Joyce P. Haag
Name (Typed): JOYCE P. HAAG
Title (Typed): SECRETARY

Date: July 17, 1995

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: The NutraSweet Company, Successor in Interest to Gollub Analytical
(Typed)

By: Stephen B. Paige
Name (Typed): Stephen B. Paige *PHS*

Date: June 14, 1995

Title (Typed): Vice President, General Counsel

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Zenith Electronics Corporation.
(Typed)

By: John J. Van Zeyl
Name (Typed): John J. Van Zeyl

Date: March 20, 1995

Title (Typed): Senior Attorney/Litigation

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: SOLA ELECTRIC, A DIVISION OF GENERAL SIGNAL CORPORATION,
(Typed) SUCCESSOR TO DOWZER ELECTRIC

By: 

Date: April 13, 1995

Name (Typed): ROBERT C. RHODES

Title (Typed): ASSOCIATE OF GLENN IRVIN MURPHY GRAY & STEPP, L.L.P.

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: GENERAL SIGNAL CORPORATION, SUCCESSOR TO NEW YORK AIR BRAKE
(Typed)

By: Robert C Rhodes

Date: April 13, 1995

Name (Typed): ROBERT C. RHODES

Title (Typed): ASSOCIATE OF GLENN IRVIN MURPHY GRAY & STEPP, L.L.P.

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: BEAZER EAST, INC.
(Typed)

By: *Mary D. Wright*

Date: APRIL 13, 1995

Name (Typed): Mary D. Wright

Title (Typed): Assistant Secretary

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Reichhold Chemicals, Inc.
(Typed)

By: Albert F. Vickers

Date: 3/23/95

Name (Typed): Director Albert F. Vickers

Title (Typed): Director EHS.

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Elf Atochem North America, Inc./Pennwalt Corporation
(Typed)

By: *F. N. Rutherford*

Date: April 10 1995

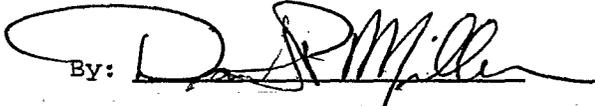
Name (Typed): F. N. Rutherford

Title (Typed): Group President - Fine Chemicals

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: United Technologies Research Center
(Typed)

By: 
Name (Typed): David P. Miller

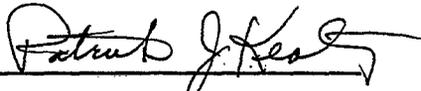
Date: 4/6/95

Title (Typed): Assistant Director of Research
for Research Services

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Carnegie Mellon University
(Typed)

By: 

Date: 4/4/95

Name (Typed): Patrick J. Keating

Title (Typed): Vice President for Business Affairs & Planning

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Loyola College
(Typed)

By: John Palmucci
Name (Typed): John Palmucci

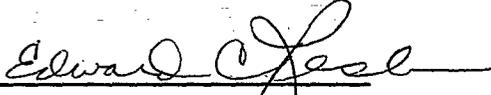
Date: 4/4/85

Title (Typed): V.P. Administration and Finance

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Northrup King Co.
(Typed)

By:  Date: March 31, 1995

Name (Typed): Edward C. Resler

Title (Typed): Vice President & General Counsel

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Miami University
(Typed)

By: *Edward J. Demske*

Date: March 31, 1995

Name (Typed): Edward J. Demske

Title (Typed) Vice President for Finance and Business Affairs

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Wesley College, Inc.
(Typed)

By: *Dixie K. Norris* Date: 5/01/95

Name (Typed): Dixie K. Norris

Title (Typed): Vice President for Finance and Treasurer

*Call Suzanne Proulx
404-347-4568*

14

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Newark Board of Education RE: Arts High School
(Typed) Newark, New Jersey

By: Eugene C. Campbell Date: May 17, 1995

Name (Typed): Eugene C. Campbell

Title (Typed): Executive Superintendent

RECEIVED
SERVICES OPERATIONS

MAY 23 1995 3:02 PM

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Monsanto Company
(Typed)

By: Michael R. Foresman PHS

Date: 4/3/95

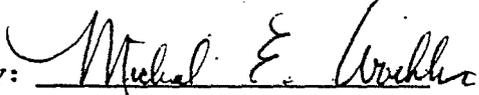
Name (Typed): Michael R. Foresman

Title (Typed): Director, Remedial Projects

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Pharmacia Biotech Inc.
f/k/a Pharmacia P-L Biochemicals Inc.
(Typed)

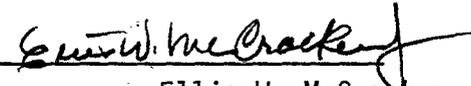
By: 
Name (Typed): Michael E. Woehler
Title (Typed): President

Date: March 29, 1995

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Anheuser-Busch Co., Inc.
(Typed)

By: 
Name (Typed): Ellis W. McCracken, Jr.

Date: March 30, 1995

Title (Typed): Vice President and
General Counsel

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Owens-Corning Fiberglas
(Typed)

By: Joyce A. Graves

Date: April 4, 1995

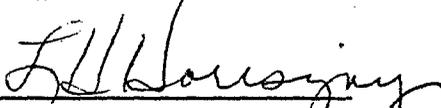
Name (Typed): Joyce A. Graves

Title (Typed): Case Management Specialist

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Borg-Warner Automotive, Inc.
(Typed)

By: 

Date: March 30, 1995

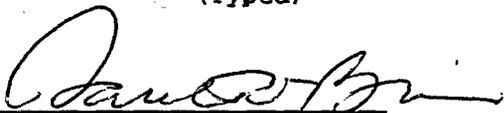
Name (Typed): Laurene H. Horisny

Title (Typed): Vice President

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: HULS AMERICA INC.
(Typed)

By:  Date: March 27, 1995

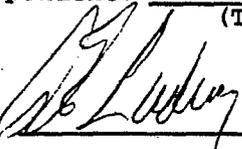
Name (Typed): Paul T. O'Brien

Title (Typed): Executive Vice President

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: GTE OPERATIONS SUPPORT INCORPORATED*
(Typed)

By: 

Date: 8/25/95

Name (Typed): A. E. Ludwig

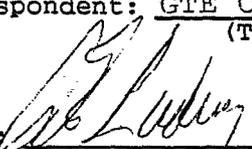
Title (Typed): VP-Controller

* Successor in interest in this
matter to GTE Communication
Systems Corporation;
Gibson Electric of Puerto Rico, Inc.

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: GTE OPERATIONS SUPPORT INCORPORATED*
(Typed)

By: 

Date: 8/25/95

Name (Typed): A. E. Ludwig

Title (Typed): VP-Controller

* Successor in interest in this
matter to GTE Communication
Systems Corporation;
Gibson Electric of Puerto Rico, Inc.

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Westvaco Corporation
(Typed)

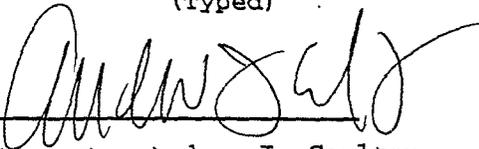
By: Robert H. Dickinson
Name (Typed): Robert H. Dickinson
Title (Typed): Vice President

Date: 3/22/95

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Ecolab Inc.
(Formerly Economics Laboratory, Inc.)
(Typed)

By: 

Date: March 28, 1995

Name (Typed): Andrew I. Coulter

Title (Typed): Assistant Secretary

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: BUSH BOAKE ALLEN INC.
(Typed)

By: Dennis M. Meany

Date: MARCH 27, 1975

Name (Typed): DENNIS M. MEANY

Title (Typed): VICE PRESIDENT, GENERAL COUNSEL & SECRETARY

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Bell Helicopter Textron Inc.
(Typed)

By: Ronald E. Watrous Date: 3/24/95

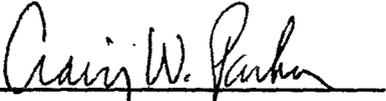
Name (Typed): Ronald E. Watrous

Title (Typed): Chief Attorney - Legal Services

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: The Catholic University of America
(Typed)

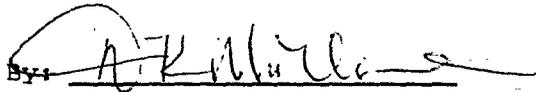
By: 
Name (Typed): Craig W. Parker
Title (Typed): General Counsel

Date: March 24, 1995

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Mine Safety Appliances Company (Catalyst Research)
(Typed)

By: 

Date: 3 22 95

Name (Typed): Douglas K. McClaine

Title (Typed): Associate General Counsel

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Chrysler Corporation
(Typed)

By: Holly Leese

Date: March 27, 1995

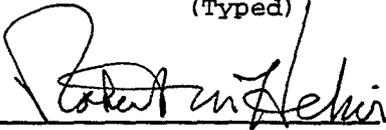
Name (Typed): Holly Leese

Title (Typed): Assistant Secretary

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

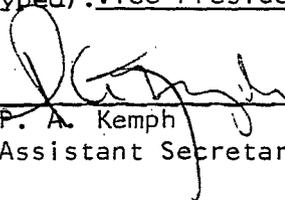
Respondent: The Goodyear Tire & Rubber Company
(Typed)

By: 

Date: March 23, 1995

Name (Typed): R. M. Hehir

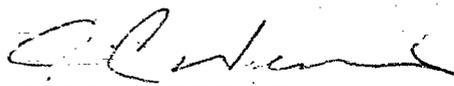
Title (Typed): Vice President

Attest: 
P. A. Kempf
Assistant Secretary

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Loral Defense Systems (formerly Loral Systems Group)
(Typed)

By:  Date: 3/22/95

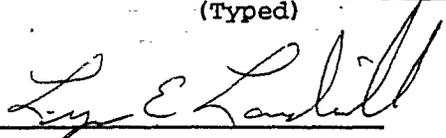
Name (Typed): Jay C. Wilcox

Title (Typed): Executive Vice President

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Ralston Purina Company
(Typed)

BY: 

Date: 3-23-95

Name (Typed): Lynn E. Loudermilk

Title (Typed): Director, Lab Operations

Aqua-Tech
Administrative Order on Consent

IS

IT IS SO AGREED:

Respondent: ALZA CORPORATION
(Typed)

By: 

Date: 4/13/95

Name (Typed): Gary V. Fulscher

Title (Typed): Senior Vice President, Operations

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Morton International, Inc.
(Typed)

By: Walanski

Date: April 13, 1995

Name (Typed): K. A. Walanski

Title (Typed): Dir. Environmental Affairs

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Norfolk Southern Railway Company
(Typed)

By: *CJ Wehrmeister* Date: 4/4/95

Name (Typed): C. J. Wehrmeister

Title (Typed): Assistant Vice President Safety and Environmental

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: University of Nebraska
(Typed)

By: Donald S. Leuenberger Date: 7 April 1995

Name (Typed): Donald S. Leuenberger

Title (Typed): Vice Chancellor for Business and Finance
University of Nebraska Medical Center

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: University of Florida
(Typed)

By:  Date: 4-7-95

Name (Typed): John V. Lombardi

Title (Typed): President


Gerald Schaffer, Vice President for Administrative Affairs

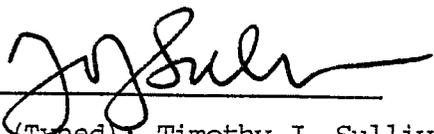
**APPROVED AS TO FORM AND
LEGALITY**


**Office of General Counsel
University of Florida**

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: The College of William and Mary
(Typed)

By: 
Name (Typed): Timothy J. Sullivan
Title (Typed): President

Date: 11 April 1991

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Vista Chemical Company
(Typed)

BY: P. L. Jernigan
Name (Typed): P. L. Jernigan

Date: 4/3/95

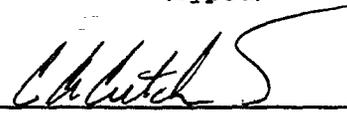
Title (Typed): Vice President
and General Manager
Petrochemicals and Inorganics

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

James River Paper Company, Inc.
and James River Corporation of Virginia
fdba James River Graphics

Respondent: _____
(Typed)

By: 

Date: 4/12/95

Name (Typed): Clifford A. Cutchins, IV

Title (Typed): Senior Vice President, Secretary

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: University of Louisville
(Typed)

By: Larry L. Owsley

Date: 4/21/95

Name (Typed): Larry L. Owsley

Title (Typed): Vice President/Administration

Legal Review:

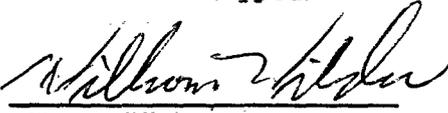
Thomas H. Ryan

Office of University Counsel

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Montgomery County Public Schools (Winston Churchill High School)
(Typed)

By: 

Date: 4/17/95

Name (Typed): William M. Wilder

Title (Typed): Director, Dept. of Facilities Management

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Energy Technology
(Typed)

By: *JoAnn Stichling*

Date: 4/18/95

Name (Typed): JoAnn Stichling

Title (Typed): Secretary

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Mallinckrodt, Inc.
(Typed)

By: M G Nichols Date: 4/20/95

Name (Typed): Mack G. Nichols

Title (Typed): President, Mallinckrodt, Inc.

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: HILLSBOROUGH COUNTY SCHOOL BOARD
(Typed)

By: *Walter L. Sickles*

Date: *April 21, 1995*

Name (Typed): Walter L. Sickles

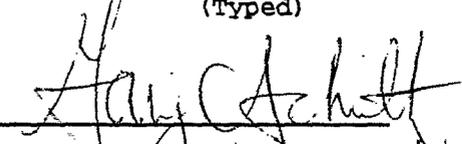
Title (Typed): Superintendent

END

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: The Pennsylvania State University
(Typed)

By: 
Name (Typed): Gary C. Schultz
Title (Typed): **Sr. Vice President for
Finance & Business/
Treasurer**

Date: 4/19/95

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Westinghouse Electric Corporation
(Typed)

By: 

Date: April 24, 1995

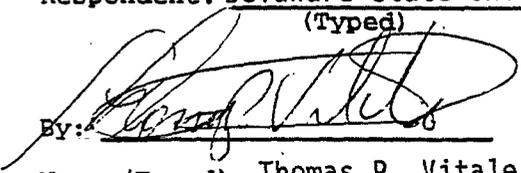
Name (Typed): Samuel R. Pitts

Title (Typed): Vice President

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Delaware State University
(Typed)

By: 

Date: 4/3/95

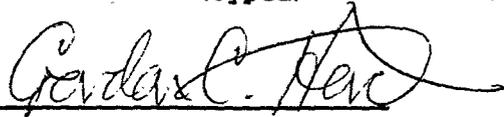
Name (Typed): Thomas P. Vitale

Title (Typed): Interim V. P. for
Business & Finance

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: American Health Foundation
(Typed)

By:  Date: 3/23/95

Name (Typed): Dr. Gordon C. Hard

Title (Typed): Administrator

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: The Sherwin-Williams Company
(Typed)

By: 

Date: April 19, 1995

Name (Typed): Louis E. Stellato

Title (Typed): Vice President, General Counsel & Secretary

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: American Recovery Company, Inc.
(Typed)

By: *Nicholas P. Gill*

Date: 3/29/95

Name (Typed): Nicholas P. Gill

Title (Typed): President

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: KENNAMETAL, INC.
(Typed)

By: William L. Gregory

Date: 17 April 95

Name (Typed): William L. Gregory

Title (Typed): Manager, Facilities Management

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Norton Company
(Typed)

By:  Date: 4/18/95

Name (Typed): Paul W. Rappleyea

Title (Typed): Senior Environmental Engineer

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: SAMSEL SERVICES COMPANY
(Typed)

By: *Claude A. Kubrak*

Date: APRIL 12, 1995

Name (Typed): CLAUDE A. KUBRAK

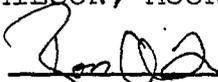
Title (Typed): PRESIDENT/CEO

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Rider University
(Typed)

JAMIESON, MOORE, PESKIN & SPICER, P.C.

By: 

Date: April 18, 1995

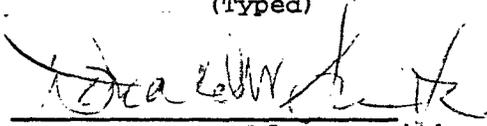
Name (Typed): Ross A. Lewin

Title (Typed): Attorney for Respondent

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: PIERCE & STEVENS, INC.
(Typed)

By:  Date: 4/20/45
Name (Typed): Donald W. Smith
Title (Typed): Corporate Vice President
Pratt & Lambert United, Inc.

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: E. I. du Pont de Nemours & Co., (Inc.)
(Typed)

By: John D. Chidley
Name (Typed): John D. Chidley

Date: 4/6/95

Title (Typed): Business Program Manager
Corporate Remediation Group

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Consolidated Rail Corporation
(Typed)

By: Thomas Pendergast

Date: 4-19-95

Name (Typed): Thomas Pendergast

Title (Typed): Director-Superfund

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: The Gillette Company
(Typed)

By: Senior Group Counsel
Deborah Marson

Date: 4/28/95

Name (Typed): Deborah Marson

Title (Typed): Senior Group Counsel

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: International Business Machines Corporation
(Typed)

By: 

Date: April 27, 1995

Name (Typed): Thomas A. Budge, Jr.

Title (Typed): Associate General Counsel

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: WRIGHT STATE UNIVERSITY
(Typed)

By: Gwen M. Mattison Date: 4/26/95

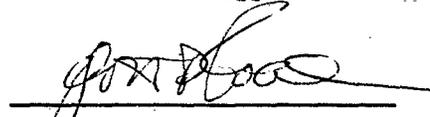
Name (Typed): Gwen M. Mattison

Title (Typed): University Counsel

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Saltire Industrial, Inc. (formerly known as Scovill Inc.)
(Typed)

By: 

Date: April 12, 1995

Name (Typed): Scott D. Robbins

Title (Typed): Executive Vice President

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Aerojet-General Corporation
(Typed)

By: Suzanne L. Phinney
Name (Typed): Suzanne L. Phinney

Date: April 12, 1995

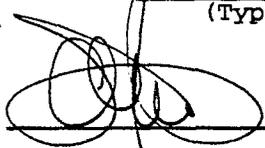
Title (Typed): Vice President, Environmental

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

MAYOR AND CITY COUNCIL OF BALTIMORE

Respondent: ("CITY OF BALTIMORE")
(Typed)

By:  _____

Date: 4/21/95

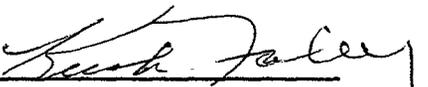
Name (Typed): Otho M. Thompson

Title (Typed): Deputy City Solicitor

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Radiac Research Corp.
(Typed)

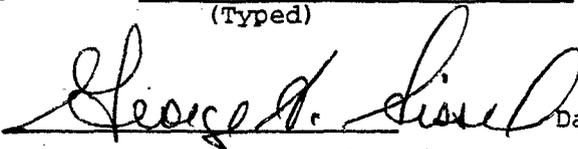
By: 
Name (Typed): Keith Foley
Title (Typed): Vice President

Date: April 24, 1995

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: BALL CORPORATION
(Typed)

By:  Date: April 25, 1995

Name (Typed): George A. Sissel

Title (Typed): Acting President and
Chief Executive Officer

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: The Ohio State University
(Typed)

By: Janet G. Pichette Date: 26 Apr 95

Name (Typed): Janet G. Pichette

Title (Typed): Vice President - Business & Administration

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Unisys Corporation
(Typed)

By: 

Date: 4-21-95

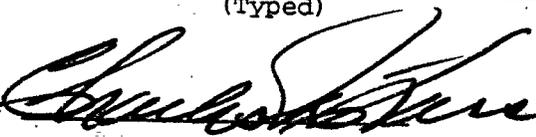
Name (Typed): Ronald C. Anderson

Title (Typed): Assistant Secretary

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: University of Wisconsin-Madison
(Typed)

By:  Date: April 27, 1995

Name (Typed): Charles R. Larsen

Title (Typed): Assistant Attorney General

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Wesley-Jessen Corporation
(Typed)

LB By: X Charles M. Stroupe
Name (Typed): Charles M. Stroupe
Title (Typed): President

Date: Apr 19, 1995

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent : University of California
(Typed)

By: V. Wayne Kennedy Date: 4/25/95

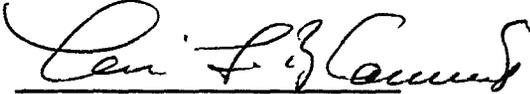
Name (Typed) : V. Wayne Kennedy

Title (Typed) : Senior Vice President
The Regents of the University of California

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Corning Hazleton Inc. (Formerly Hazleton Laboratories)
(Typed)

By:  Date: May 4, 1995

Name (Typed): Tim Blauvelt

Title (Typed): Staff Specialist /
Environmental Coordinator

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Occidental Chemical Corporation
(Typed)

By: Lloyd F. Wood, Jr.

Date: 5/8/95

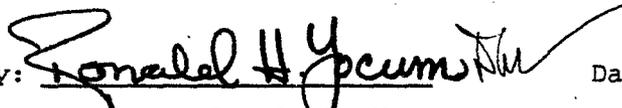
Name (Typed): Lloyd F. Wood, Jr.

Title (Typed): Director-Special Environmental Programs

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Quantum Chemical Company
(Typed)

By:  Date: April 28, 1995

Name (Typed): Ronald H. Yocum

Title (Typed): Chairman, President and CEO

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Hughes Research Laboratories
(Typed)

By: 

Date: 4/28/95

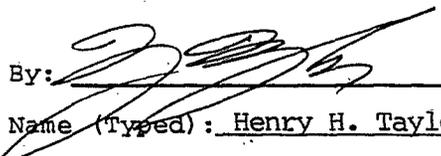
Name (Typed): Susan Harmon

Title (Typed): Head, Safety, Health and Environmental Affairs

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Laidlaw Environmental Services (TS), Inc.
Respondent: f.k.a. GSX, Incorporated
(Typed)

By: 
Name (Typed): Henry H. Taylor
Title (Typed): Secretary

Date: May 3, 1995

14

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Johns Hopkins Hospital
(Typed)

By: Richard P. Kidwell

Date: 5-2-95

Name (Typed): Richard P. Kidwell

Title (Typed): Managing Attorney
Claims/Litigation

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Rust-Oleum Corporation
(Typed)

By: Helen A. Reetz

Date: April 24, 1995

Name (Typed): Helen A. Reetz

Title (Typed): Attorney and Director - Quality and Regulatory Affairs

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: THE JOHNS HOPKINS UNIVERSITY
(Typed)

By: Eugene S. Sunshine

Date: April 28, 1995

Name (Typed): Eugene S. Sunshine

Title (Typed): Senior Vice President
for Administration

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: BATTELLE MEMORIAL INSTITUTE
(Typed)

By:


Jerome R. Bahlmann

Date:

4/4/95

Title (Typed): Sr. Vice President and
General Counsel

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Mich Dept. of Transportation
(Typed)

By: 

Date: April 26, 1995

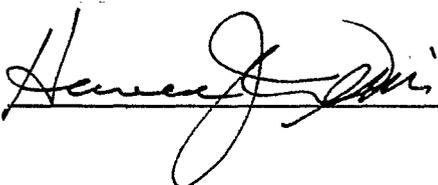
Name (Typed): G. Robert Adams.

Title (Typed): MDOT, Deputy Director

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Texaco Inc.

By: 

Date: April 26, 1995

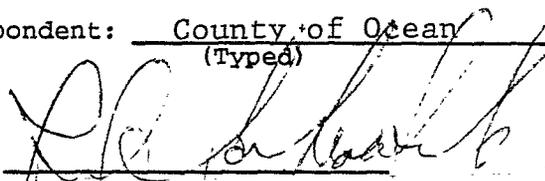
Name: Harold J. Weiss

Title: Manager - Centralized Waste Site Management Group

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: County of Ocean
(Typed)

By:  Date: April 27, 1995

Name (Typed): John C. Sahradnik

Title, (Typed): Assistant County Counsel

Agua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: General Mills, Inc. *OK*
(Typed)

By: *William A. Van Brunt*

Date: *Apr. 27, 1995*

Name (Typed): William A. Van Brunt, Esq.

Title (Typed): Vice President

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: CHEMICAL WASTE MANAGEMENT, INC.
(Typed)

By: Andi S. Kenney

Date: April 27, 1995

Name (Typed): Andi S. Kenney

Title (Typed): Its counsel

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: LIQUID CARBONIC
(Typed)

By: Brian P. Curtis Date: 4/25/95

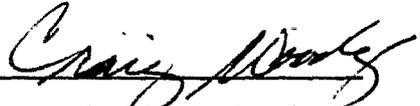
Name (Typed): BRIAN P. CURTIS

Title (Typed): REGULATORY COMPLIANCE MANAGER

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: University of Denver (Colorado Seminary)
(Typed)

By: 
Name (Typed): Craig Woody

Date: 4-26-95

Title (Typed): Vice Chancellor for Business and
Financial Affairs/Treasurer

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Engelhard Corporation
(Typed)

By: *Donald R. Baker for*

Date: April 28, 1995

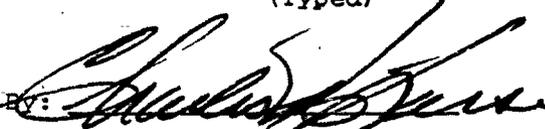
Name (Typed): Donald R. Baker

Title (Typed): Director
Environment, Health & Safety

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Wisconsin DOJ/State Crime Lab
(Typed)

By:  Date: April 27, 1995

Name (Typed): Charles R. Larsen

Title (Typed): Assistant Attorney General

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Don W. Kassing
(Typed)

By: San Jose State University Date: April 26, 1995

Name (Typed): Don Kassing

Title (Typed): Academic Vice President

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Johns Hopkins Hospital
(Typed)

By: Richard P. Kidwell

Date: 5-2-95

Name (Typed): Richard P. Kidwell

Title (Typed): Managing Attorney
Claims/Litigation

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: SmithKline Beecham Corporation
on behalf of Beecham Laboratories
(Typed)

By: 

Date: March 20, 1995

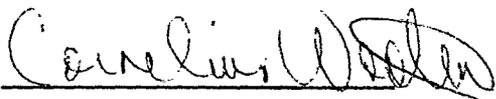
Name (Typed): Alan M. Rubinson

Title (Typed): Vice President

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Western Illinois University
(Typed)

By: 

Date: March 23, 1995

Name (Typed): Cornelius Wooten

Title (Typed): Vice President for Administrative Services

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Worcester Foundation for
Experimental Biology, Inc.
(Typed)

By: *Richard L. Eastman*

Date: March 24, 1995

Name (Typed): Richard L. Eastman

Title (Typed): Assistant Secretary

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Lehman College
(Typed)

By:  Date: May 23, 1995

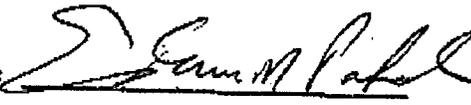
Name (Typed): Edward D. Pakel

Title (Typed): Asst. Vice President for Administration

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Lehman College
(Typed)

By:  Date: May 23, 1995

Name (Typed): Edward D. Pakel

Title (Typed): Asst. Vice President for Administration

Aqua-Tech
Administrative Order on Consent

IT IS SO AGREED:

Respondent: Kraft Foods Inc.
(Typed)

By: *Romer G. Wilsek*
Name (Typed): Romer G. Wilsek

Date: 4/28/95

Title (Typed): Director, Environmental Affairs