



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

PFE
ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Accuracy Scientific
c/o Ferdinand Weiss
G & W Instruments, Inc.
1 North Scott Street
Carbondale, PA 18407

Re: Malvern TCE Superfund Site

Dear Mr. Weiss:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, et seq., commonly known as Superfund. Pursuant to a Consent Decree that was entered in December 1999 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

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<http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund/>.¹

¹ *De minimis* guidance documents include: Methodologies for Implementation of CERCLA Section 122(g)(1)(a) *De Minimis* Waste Contributor Settlements, dated December 20, 1989, Oswer No. 9834-1B; Methodology for Early *De Minimis* Waste Contributor Settlements Under CERCLA Section 122(g)(1)(a), dated June 2, 1992, Oswer No. 9834.7-1C; Streamlined Approach for Settlements with *De Minimis* Waste Contributors Under CERCLA Section 122(g)(1)(a), date July 30, 1993, Oswer No. 9834.7-1.D.

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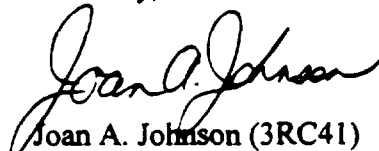
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

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Please contact Mr. Egan if you would like copies of EPA *de minimis* guidance documents or the referenced Summaries, or have any questions about this matter.

If you are interested in pursuing a *de minimis* settlement with EPA, please notify Mr. Egan of your interest within fifteen days of receipt of this letter. If EPA does not hear from you by that date, EPA will assume that you are not interested in pursuing a *de minimis* settlement with EPA. EPA is mindful that some parties already have contacted EPA, prior to receipt of this letter, and expressed an interest in pursuing a *de minimis* settlement. EPA requests that any such party confirm with Mr. Egan, within fifteen days of receipt of this letter, whether the party remains interested in pursuing a *de minimis* settlement with EPA.

Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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Airline Hydraulics Corporation
Joseph Loughran, President
PO Box 8500
S-2275
Philadelphia, PA 19178-7618

MAR 20 2003

Re: Malvern TCE Superfund Site

Dear Mr. Loughran:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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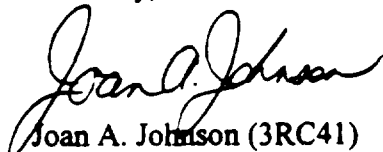
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Assistant Regional Counsel



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A&J Screw Machine Products
144 Limekiln Pike
Chalfont, PA 18914

Re: Malvern TCE Superfund Site

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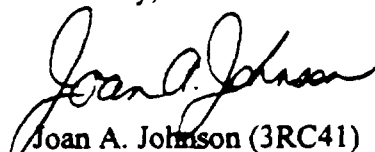
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Assistant Regional Counsel



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CFR
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MAR 20 2003

Allister Manufacturing
315 Willowbrook Lane
West Chester, PA 19382

Re: Malvern TCE Superfund Site

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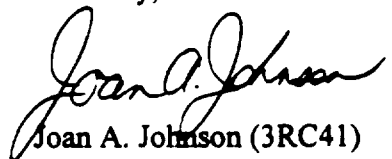
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Assistant Regional Counsel



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Philadelphia, Pennsylvania 19103-2029

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VIA UPS

Ametek, Inc.
c/o Madeline R. Berg, Esquire
Stroock & Stroock & Lavan
180 Maiden Lane
New York, NY 10038

MAR 20 2003

Re: Malvern TCE Superfund Site

Dear Ms. Berg:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al. v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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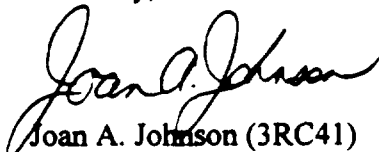
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Assistant Regional Counsel



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ORIGINAL
(Red)

VIA UPS

Ametek, Inc.
Frank Hermance
37 N. Valley Road
Bldg 4, P.O. Box 1764
Paoli, PA 19301

MAR 20 2003

Re: Malvern TCE Superfund Site

Dear Mr. Hermance:

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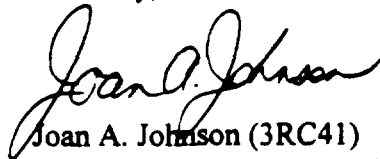
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MAR 20 2003

AMP Inc.
c/o Timothy Bergere, Esquire
Montgomery McCracken Walker & Rhoades
123 South Broad Street
Philadelphia, PA 19109

Re: Malvern TCE Superfund Site

Dear Mr. Bergere:

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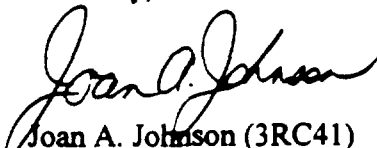
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

ORIGIN:
(Red)

VIA UPS

MAR 20 2003

AMP Inc.
c/o Tyco Electronics
Juergen Gromer, President
P.O. Box 3608
Harrisburg, PA 17105

Re: Malvern TCE Superfund Site

Dear Mr. Gromer:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, et seq., commonly know as Superfund. Pursuant to a Consent Decree that was entered in December 1999 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

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ORIGINAL
(Red)

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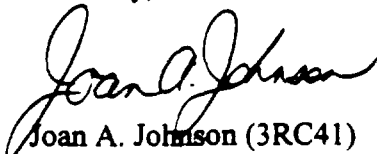
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Ark Products Co., Inc.
Rodney K. Gilbert
834 Millwood Road
Willow Street, PA 17584

Re: Malvern TCE Superfund Site

Dear Mr. Gilbert:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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ORIGINAL
(R2)

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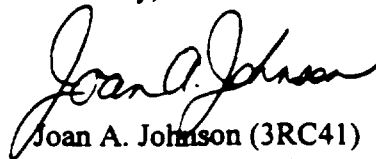
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Sincerely,



Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

ORIGINAL
(200)

VIA UPS

MAR 20 2003

Artco Inc.
c/o L-3 Communications Aydin Company
600 3rd Avenue
New York, NY 10016

Re: Malvern TCE Superfund Site

Dear Sir or Madam:

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ORIGINAL
(Reg)

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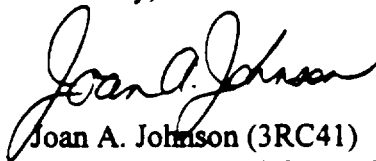
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

MAR 20 2003

ORIGINAL
(Red)

VIA UPS

Athena Controls
c/o James J. Himsworth, Esquire
Masterson, Braunfield & Milnor
One Montgomery Plaza, Suite 702
Norristown, PA 19401

Re: Malvern TCE Superfund Site

Dear Mr. Himsworth:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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ORIGINAL
1/23/01

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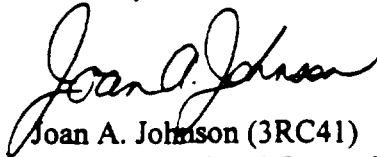
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Joan A. Johnson (3RC41)
Assistant Regional Counsel

PFE

JRIG/VA
2/27



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

VIA UPS

MAR 20 2003

Axel Johnson Metals Inc.
215 Welsh Pool Road
Exton, PA 19341

Re: Malvern TCE Superfund Site

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ORIGINAL
1921

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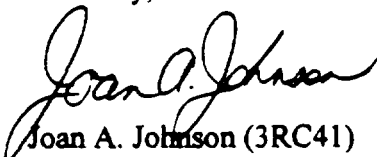
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Assistant Regional Counsel

EPA
ORIGINAL
(Reg)



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

VIA UPS

MAR 20 2003

Bishop Tube Company
c/o Christiana Metals
1191 McDermott Drive
West Chester, PA 19380

Re: Malvern TCE Superfund Site

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PTE
10/11/11
10:00

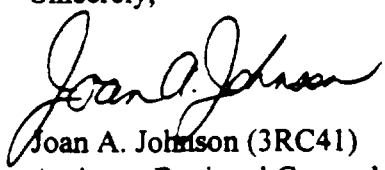
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Assistant Regional Counsel



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

ORIGINAL
(P33)

VIA UPS

MAR 20 2003

Carvel Hall, Inc.
c/o Syratech Corporation
Leonard Florence, President
175 William F. McClellan
Boston, MA 02128

Re: Malvern TCE Superfund Site

Dear Mr. Florence:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, et seq., commonly know as Superfund. Pursuant to a Consent Decree that was entered in December 1999 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

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ORIGINAL
(Red)

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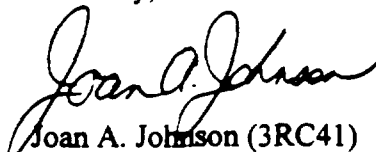
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

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Sincerely,



Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Chem Cell Corporation
246 E. County Line Road
Hatboro, PA 19040

Re: Malvern TCE Superfund Site

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PFE
ORIGINAL
(Rec'd)

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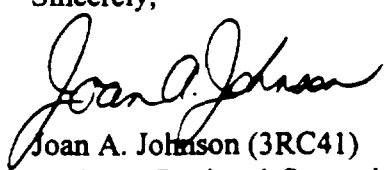
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

PFE
ORIGINAL
(Ret)

VIA UPS

MAR 20 2003

C.K. Systematics, Inc.
c/o Systematics Inc.
James Conley, CEO
1025 Saunders Lane
P.O. Box 2429
West Chester, PA 19380

Re: Malvern TCE Superfund Site

Dear Mr. Conley:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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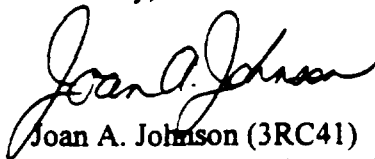
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Sincerely,



Joan A. Johnson (3RC41)
Assistant Regional Counsel

10/15/11
1907



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

VIA UPS

MAR 20 2003

Contamination Control
c/o Unistar Industries
94 County Line Road
Colmar, PA 18915

Re: Malvern TCE Superfund Site

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ORIGINAL
(Reg)

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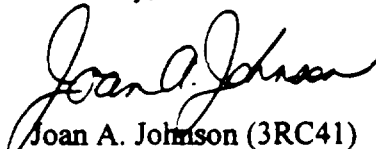
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Continental Vanguard, Inc.
204 Harding Avenue
Bellmawr, NJ 08031

Re: Malvern TCE Superfund Site

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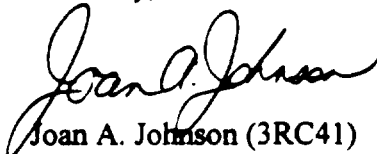
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

PFE
ORIGINAL
(Red)

VIA UPS

MAR 20 2003

CSS International Inc.
Robert Nazeley, President
2061 East Glenwood Avenue
Philadelphia, PA 19124

Re: Malvern TCE Superfund Site

Dear Mr. Nazeley:

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PFE
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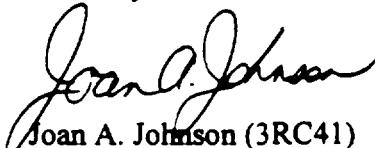
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Assistant Regional Counsel



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

PFE
ORIGINAL
(Red)

VIA UPS

MAR 20 2003

David K. Robson, Inc.
738 Maryland Avenue
Prospect Park, PA 19076

Re: Malvern TCE Superfund Site

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PFL
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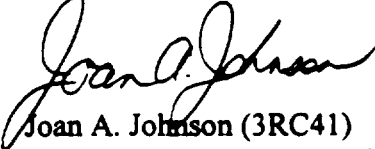
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

In the past, EPA entered into two *de minimis* settlements (in 1999 and 2001, respectively) relating to the Site. In order to determine *de minimis* eligibility for those settlements, EPA utilized Volumetric Ranking Summaries, prepared by EPA, that provided waste-in volume and percentage information for each potentially responsible party. In connection with those settlements, EPA established a *de minimis* settlement eligibility cut-off at or less than .75% of the total waste volume. EPA believes that most of you are familiar with and have been provided copies of these Summaries.

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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Display Corporation of America
c/o TSG Merchandising
Paul Schmidt, President
1250 Easton Road, Suite 200
Horsham, PA 19044

Re: Malvern TCE Superfund Site

Dear Mr. Schmidt:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al. v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, et seq., commonly known as Superfund. Pursuant to a Consent Decree that was entered in December 1999 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
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ORIGINAL
(Red)

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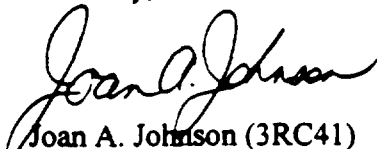
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

ORIGINAL
(5/22)

VIA UPS

MAR 20 2003

Doehler-Jarvis Corp.
5400 N. Detroit Ave.
Toldeo, OH 43612

Re: Malvern TCE Superfund Site

Dear Sir or Madam:

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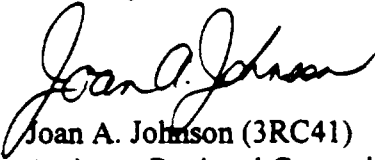
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

E. Frank Hopkins Company, Inc.
Stephen Marmer, CEO
3427 South Lawrence Road
Philadelphia, PA 19148

Re: Malvern TCE Superfund Site

Dear Mr. Marmer:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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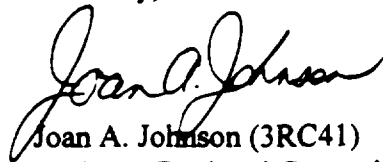
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Assistant Regional Counsel



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

ORIGINAL
(P. 1)

VIA UPS

MAR 20 2003

Electroloy Corporation
c/o F.J. Cain Corporation
353 Thornbrook Road
Rosemont, PA 19440

Re: Malvern TCE Superfund Site

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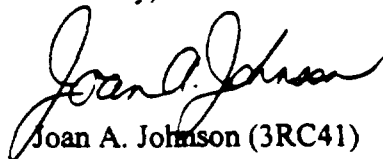
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Emeco Industries, Inc.
c/o Robert Strickler, Esquire
Griffith, Strickler, Leman, Solymas & Calkins
110 South Northern Way
York, PA 17402

Re: Malvern TCE Superfund Site

Dear Mr. Strickler:

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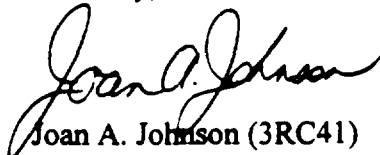
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAR 20 2003

Emeco Industries, Inc.
Greg Buchbinder, CEO
2650 El Presidio
Long Beach, CA 90810

Re: Malvern TCE Superfund Site

Dear Mr. Buchbinder:

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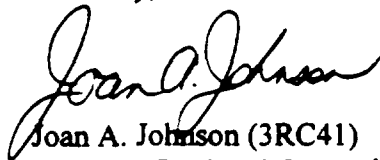
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAR 20 2003

Enterra Instrumentation Technology
251 Welsh Pool Road
Exton, PA 19341

Re: Malvern TCE Superfund Site

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EPA has been contacted by a variety of defendants named in the Litigation, seeking to enter into a *de minimis* settlement with EPA. EPA currently is in the process of evaluating whether and/or with whom EPA would enter into a *de minimis* settlement relating to the Site. Towards this end, EPA requests that any defendant that believes it may qualify for *de minimis* settlement and wishes to pursue such a settlement with EPA contact Patrick Egan, Superfund Civil Investigator, at the following:

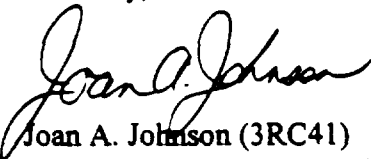
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

In the past, EPA entered into two *de minimis* settlements (in 1999 and 2001, respectively) relating to the Site. In order to determine *de minimis* eligibility for those settlements, EPA utilized Volumetric Ranking Summaries, prepared by EPA, that provided waste-in volume and percentage information for each potentially responsible party. In connection with those settlements, EPA established a *de minimis* settlement eligibility cut-off at or less than .75% of the total waste volume. EPA believes that most of you are familiar with and have been provided copies of these Summaries.

Please contact Mr. Egan if you would like copies of EPA *de minimis* guidance documents or the referenced Summaries, or have any questions about this matter.

If you are interested in pursuing a *de minimis* settlement with EPA, please notify Mr. Egan of your interest within fifteen days of receipt of this letter. If EPA does not hear from you by that date, EPA will assume that you are not interested in pursuing a *de minimis* settlement with EPA. EPA is mindful that some parties already have contacted EPA, prior to receipt of this letter, and expressed an interest in pursuing a *de minimis* settlement. EPA requests that any such party confirm with Mr. Egan, within fifteen days of receipt of this letter, whether the party remains interested in pursuing a *de minimis* settlement with EPA.

Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Fabric Development Inc.
c/o Dennis Denard, Esquire
892 Second Street, Suite C
Richboro, PA 18954

Re: Malvern TCE Superfund Site

Dear Mr. Denard:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, *et seq.*, commonly know as Superfund. Pursuant to a Consent Decree that was entered in December 1999 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final cleanup of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
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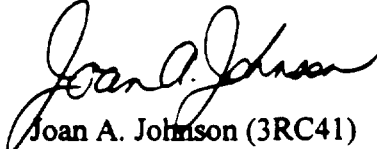
Patrick Egan (3HS11)
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Please contact Mr. Egan if you would like copies of EPA *de minimis* guidance documents or the referenced Summaries, or have any questions about this matter.

If you are interested in pursuing a *de minimis* settlement with EPA, please notify Mr. Egan of your interest within fifteen days of receipt of this letter. If EPA does not hear from you by that date, EPA will assume that you are not interested in pursuing a *de minimis* settlement with EPA. EPA is mindful that some parties already have contacted EPA, prior to receipt of this letter, and expressed an interest in pursuing a *de minimis* settlement. EPA requests that any such party confirm with Mr. Egan, within fifteen days of receipt of this letter, whether the party remains interested in pursuing a *de minimis* settlement with EPA.

Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Fabric Development Inc.
Peter Shah, President
1217 West Mill Street
PO Box 462
Quakertown, PA 19851

Re: Malvern TCE Superfund Site

Dear Mr. Shah:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, *et seq.*, commonly known as Superfund. Pursuant to a Consent Decree that was entered in March of 1992 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
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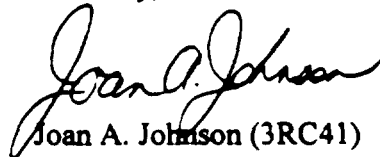
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Fairfax Cleaners
c/o Fairfax Valet Cleaners
Steven Oh, Owner
3 Fairfax Boulevard
Wilmington, DE 19803

Re: Malvern TCE Superfund Site

Dear Mr. Oh:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
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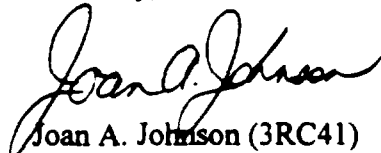
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

FBF Industries
Norman H. Ryan
1145 Industrial Highway
Southampton, PA 18966

Re: Malvern TCE Superfund Site

Dear Mr. Ryan:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
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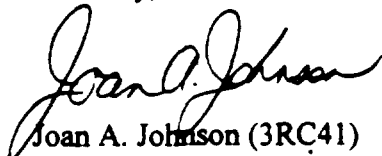
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029
MAR 20 2003

VIA UPS

Fergusson-Solvents Company
c/o Steven Harris, Esquire
Harris & Harris
1760 Bristol Road-Box 160
Warrington, PA 18976

Re: Malvern TCE Superfund Site

Dear Mr. Harris:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, *et seq.*, commonly known as Superfund. Pursuant to a Consent Decree that was entered in Federal Court by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

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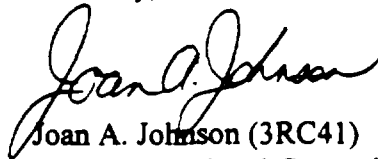
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029
MAR 20 2003

PFE
ORIGINAL
(Red)

VIA UPS

Fergusson Solvents Company
c/o Fergusson-McKenna Supply Co.
Todd McKenna, CEO
320 North Mill Road
Kennett Square, PA 19348

Re: Malvern TCE Superfund Site

Dear Mr. McKenna:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, et seq., commonly know as Superfund. Pursuant to a Consent Decree that was entered in December, 1992, by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

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PFT
ORIGINAL
(Red)

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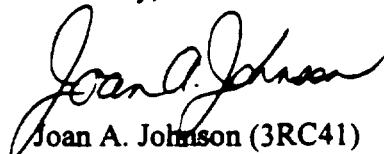
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United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

PFE
ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Fraser-Volpe
Joseph Volpe, President
1025 Thomas Drive
Warrington, PA 18974

Re: Malvern TCE Superfund Site

Dear Mr. Volpe:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, et seq., commonly know as Superfund. Pursuant to a Consent Decree that was entered in December 1999 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
<http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund/>.¹

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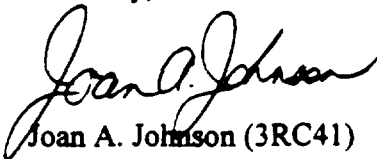
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

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Please contact Mr. Egan if you would like copies of EPA *de minimis* guidance documents or the referenced Summaries, or have any questions about this matter.

If you are interested in pursuing a *de minimis* settlement with EPA, please notify Mr. Egan of your interest within fifteen days of receipt of this letter. If EPA does not hear from you by that date, EPA will assume that you are not interested in pursuing a *de minimis* settlement with EPA. EPA is mindful that some parties already have contacted EPA, prior to receipt of this letter, and expressed an interest in pursuing a *de minimis* settlement. EPA requests that any such party confirm with Mr. Egan, within fifteen days of receipt of this letter, whether the party remains interested in pursuing a *de minimis* settlement with EPA.

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MAR 20 2003

FTC Hazardous Inc.
7333 Milnor Street
Philadelphia, PA 19136

Re: Malvern TCE Superfund Site

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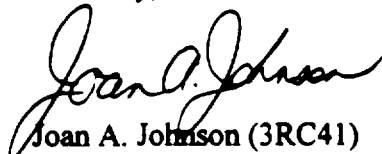
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MAR 20 2003

George K. Garrett Corporation
2914 North 16th Street
Philadelphia, PA 19132

Re: Malvern TCE Superfund Site

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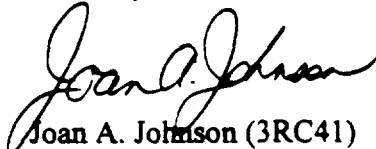
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VIA UPS

MAR 20 2003

Glah Brothers Inc.
c/o Formal Affairs Inc.
41 South York Road
Hatboro, PA 19040

Re: Malvern TCE Superfund Site

Dear Sir or Madam:

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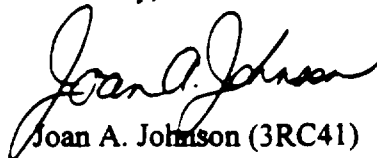
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1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

PFL
ORIGINAL
Red)

VIA UPS

MAR 20 2003

Gulf & Western Industries
c/o Viacom International, Inc.
Sumner Redstone, President
1515 Broadway
New York, NY 10023

Re: Malvern TCE Superfund Site

Dear Mr. Redstone:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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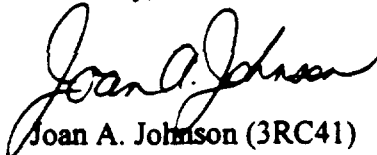
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

PEL

VIA UPS

MAR 20 2003

High Energy Corp.
George Georgeopolous, President
Lower Valley Road
Parkersburg, PA 19365

Re: Malvern TCE Superfund Site

Dear Mr. Georgeopolous:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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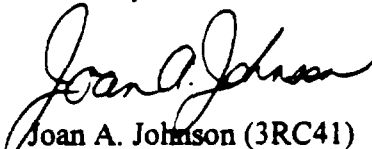
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RECEIVED

VIA UPS

MAR 20 2003

High Energy Corp.
c/o Walter Leach, III, Esquire
Inductotherm Industries, Inc.
10 Indel Avenue
Rancocas, NJ 08073

Re: Malvern TCE Superfund Site

Dear Mr. Leach:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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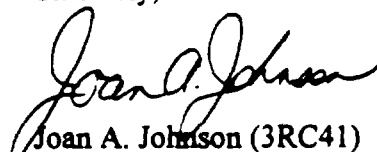
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

PFL
EPA
Red

VIA UPS

MAR 20 2003

Hulltronics Inc.
c/o Hull Corporation
21 Bonair Drive
Warminster, PA 18974

Re: Malvern TCE Superfund Site

Dear Sir or Madam:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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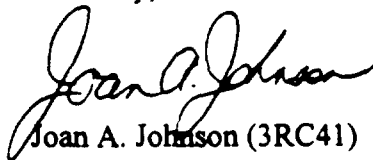
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

PF

VIA UPS

MAR 20 2003

Inland Pumping & Dredgeing
138 West Lancaster Avenue
Downingtown, PA 19335

Re: Malvern TCE Superfund Site

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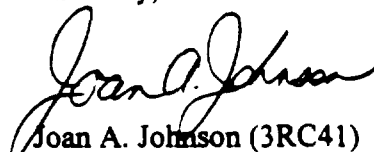
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

PFE

VIA UPS

MAR 20 2003

J & J Spill Service & Supplies, Inc.
c/o George Ozorowski, Esquire
Hughes & Kalkbrenner
621 East Germantown Pike, Suite 205
Norristown, PA 19401

Re: Malvern TCE Superfund Site

Dear Mr. Ozorowski:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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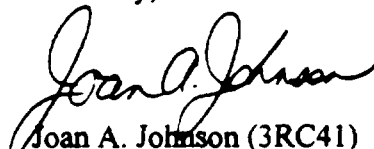
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

RECEIVED
MAR 20 2003

VIA UPS

MAR 20 2003

J & J Spill Service & Supplies, Inc.
C. Phillip Ettinger, President
P.O. Box 370
Blue Bell, PA 19422

Re: Malvern TCE Superfund Site

Dear Mr. Ettinger:

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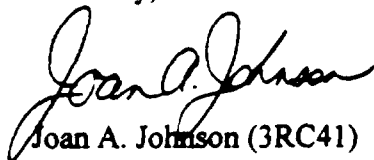
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

MAR 20 2003

VIA UPS

Keystone Block Transportation Company
c/o Keystone Environmental Services
1866 W. Main Street
Stroudsburg, PA 18630

Re: Malvern TCE Superfund Site

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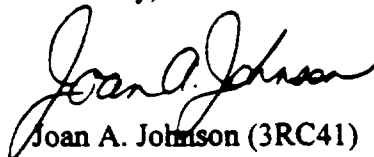
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
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VIA UPS

MAR 20 2003

Keystone Transformer Company
166 West Pryce Street
Philadelphia, PA 19144

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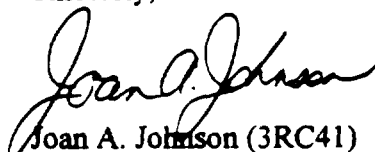
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAR 20 2003

Kosempel Manufacturing Company, Inc.
c/o Philip L. Hinerman, Esquire
Fox, Rothchild, O'Brien and Frankel
2000 Market Street 10th Floor
Philadelphia, PA 19103

Re: Malvern TCE Superfund Site

Dear Mr. Hinerman:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, *et seq.*, commonly known as Superfund. Pursuant to a Consent Decree that was entered in December 1992 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
<http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund/>.¹

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EPA has been contacted by a variety of defendants named in the Litigation, seeking to enter into a *de minimis* settlement with EPA. EPA currently is in the process of evaluating whether and/or with whom EPA would enter into a *de minimis* settlement relating to the Site. Towards this end, EPA requests that any defendant that believes it may qualify for *de minimis* settlement and wishes to pursue such a settlement with EPA contact Patrick Egan, Superfund Civil Investigator, at the following:

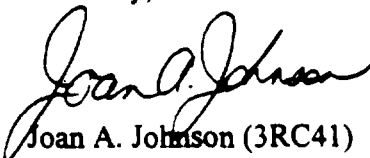
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

In the past, EPA entered into two *de minimis* settlements (in 1999 and 2001, respectively) relating to the Site. In order to determine *de minimis* eligibility for those settlements, EPA utilized Volumetric Ranking Summaries, prepared by EPA, that provided waste-in volume and percentage information for each potentially responsible party. In connection with those settlements, EPA established a *de minimis* settlement eligibility cut-off at or less than .75% of the total waste volume. EPA believes that most of you are familiar with and have been provided copies of these Summaries.

Please contact Mr. Egan if you would like copies of EPA *de minimis* guidance documents or the referenced Summaries, or have any questions about this matter.

If you are interested in pursuing a *de minimis* settlement with EPA, please notify Mr. Egan of your interest within fifteen days of receipt of this letter. If EPA does not hear from you by that date, EPA will assume that you are not interested in pursuing a *de minimis* settlement with EPA. EPA is mindful that some parties already have contacted EPA, prior to receipt of this letter, and expressed an interest in pursuing a *de minimis* settlement. EPA requests that any such party confirm with Mr. Egan, within fifteen days of receipt of this letter, whether the party remains interested in pursuing a *de minimis* settlement with EPA.

Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Kosempel Manufacturing Company, Inc.
Paul Kosempel, President
3760 M Street
Philadelphia, PA 19124

Re: Malvern TCE Superfund Site

Dear Mr. Kosempel:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
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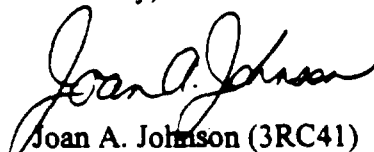
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Lancaster Machinery
715 Mountain Road
Lancaster, PA 17601

Re: Malvern TCE Superfund Site

Dear Sir or Madam:

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A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
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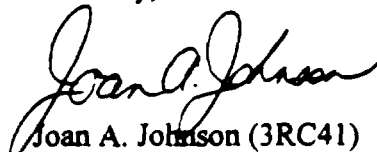
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

PFL
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Red)

VIA UPS

MAR 20 2003

Lavelle Aircraft Company
Albert Bailey
275 Geiger Road
Philadelphia, PA 19115

Re: Malvern TCE Superfund Site

Dear Mr. Bailey:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
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ORIGINAL
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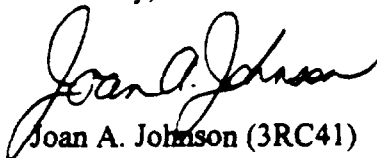
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United States Environmental Protection Agency
Region III
1650 Arch Street
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

PFE
PHILADELPHIA
REG. III

VIA UPS

MAR 20 2003

Leeds & Northrup
c/o Joel Bolstein, Esq.
Fox Rothschild O'Brien & Frankel, LLP
102 North Main Street
Doylestown, PA 18901-0700

Re: Malvern TCE Superfund Site

Dear Mr. Bolstein:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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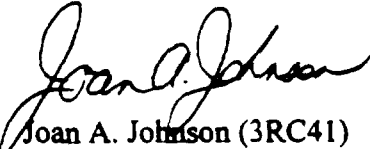
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1650 Arch Street
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Leeds & Northrup
c/o Honeywell
101 Columbia Road
Morristown, NJ 07962

Re: Malvern TCE Superfund Site

Dear Sir or Madam:

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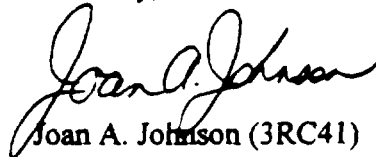
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Lightman Drum Company
J. Lightman, President
State Highway #73
P.O. Box 22
Berlin, NJ 08009

Re: Malvern TCE Superfund Site

Dear Mr. Lightman:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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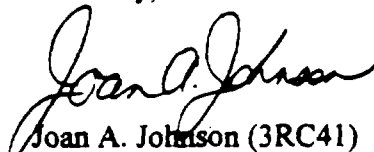
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(215) 814-3167
egan.patrick@epa.gov

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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Lovekin R.E. Corporation
1505 Race Street
Philadelphia, PA 19103

Re: Malvern TCE Superfund Site

Dear Sir or Madam:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, et seq., commonly know as Superfund. Pursuant to a Consent Decree that was entered in December 1999 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

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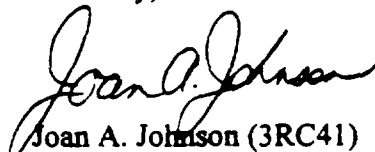
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Malco Inc.
c/o Unistar Industries
94 County Line Road
Colmar, PA 18915

Re: Malvern TCE Superfund Site

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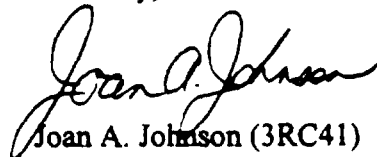
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Assistant Regional Counsel



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

ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Manorgraphics Inc.
541 Washington Avenue
Phoenixville, PA 19460

Re: Malvern TCE Superfund Site

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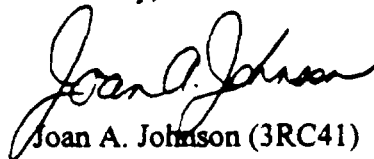
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Assistant Regional Counsel



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

ORIGINAL
(2 of 2)

VIA UPS

MAR 20 2003

Matheson Instruments
c/o Tom Jackson, Esquire
Kelley, Drye and Warren, LLP
1200 19th Street, NW
Washington, DC 20036

Re: Malvern TCE Superfund Site

Dear Mr. Jackson:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al. v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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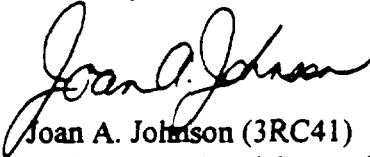
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Region III
1650 Arch Street
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Matheson Instruments
c/o Matheson Tri-Gas Inc.
Susan Sandro, Director of Compliance
2402 Brittany Court
Dayton, OH 45459

Re: Malvern TCE Superfund Site

Dear Ms. Sandro:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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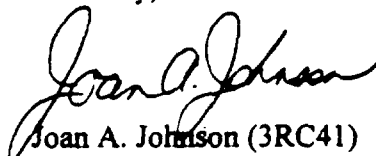
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAR 20 2003

McClarin Plastics
Todd Kennedy, President
600 Linden Avenue
Hanover, PA 17331

Re: Malvern TCE Superfund Site

Dear Mr. Kennedy:

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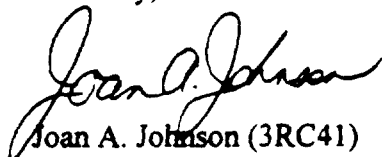
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAR 20 2003

Model Finishing Business
Ms. Francis Freed, Vice President
4949 Cottman Avenue
Philadelphia, PA 19135

Re: Malvern TCE Superfund Site

Dear Ms. Freed:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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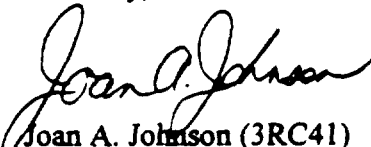
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Monitor Systems
c/o L-3 Communications Aydin Company
600 3rd Avenue
New York, NY 10016

Re: Malvern TCE Superfund Site

Dear Sir or Madam:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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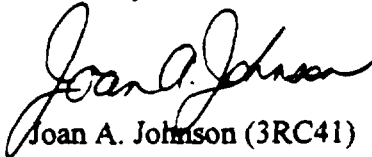
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Narco Avionics
c/o Douglas R. Blazey, Esq.
Elliott Reihner Siedzikowski & Egan, P.C.
P.O. Box 3010
925 Harvest Drive
Blue Bell, PA 19422

Re: Malvern TCE Superfund Site

Dear Mr. Blazey:

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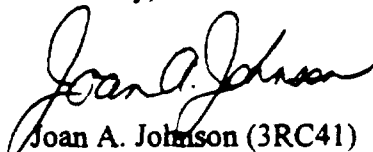
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Narco Avionics
Edward M. Zimmer, Jr.
270 Commerce Drive
Fort Washington, PA 19034

Re: Malvern TCE Superfund Site

Dear Mr. Zimmer:

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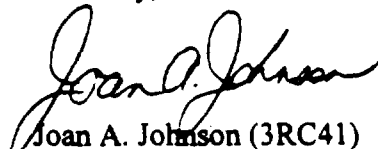
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

National Metalcrafters Inc.
Neal Greenberg, CEO
1401 Oxford Street
Philadelphia, PA 19125

Re: Malvern TCE Superfund Site

Dear Mr. Greenberg:

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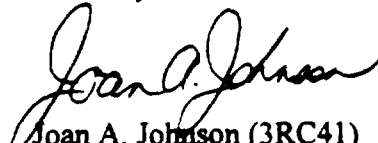
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAR 20 2003

NW Controls
c/o David Toomey, Esquire
Duane Morris & Heckscher
One Liberty Place
Philadelphia, PA 19103-7396

Re: Malvern TCE Superfund Site

Dear Mr. Toomey:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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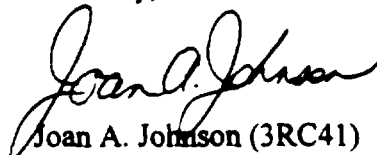
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAR 21 2003

NW Controls Inc.
Henry Schontz, President
2210 Shelly Road
Harleysville, PA 19438

Re: Malvern TCE Superfund Site

Dear Mr. Schontz:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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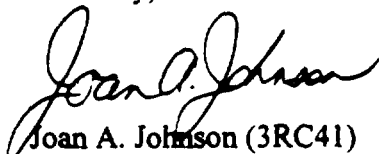
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAR 20 2003

Oxford Metal Products, Inc.
c/o Alvin T. Feldman, President
130 Spruce Street, Apt 34A
Philadelphia, PA 19106

Re: Malvern TCE Superfund Site

Dear Mr. Feldman:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, et seq., commonly know as Superfund. Pursuant to a Consent Decree that was entered in December 1999 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean-up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
<http://cfpub.epa.gov/compliance/resources/policies/cleanup/superfund/>.¹

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EPA has been contacted by a variety of defendants named in the Litigation, seeking to enter into a *de minimis* settlement with EPA. EPA currently is in the process of evaluating whether and/or with whom EPA would enter into a *de minimis* settlement relating to the Site. Towards this end, EPA requests that any defendant that believes it may qualify for *de minimis* settlement and wishes to pursue such a settlement with EPA contact Patrick Egan, Superfund Civil Investigator, at the following:

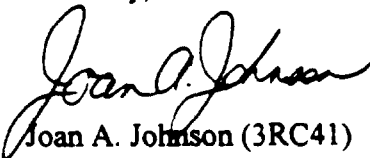
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

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Please contact Mr. Egan if you would like copies of EPA *de minimis* guidance documents or the referenced Summaries, or have any questions about this matter.

If you are interested in pursuing a *de minimis* settlement with EPA, please notify Mr. Egan of your interest within fifteen days of receipt of this letter. If EPA does not hear from you by that date, EPA will assume that you are not interested in pursuing a *de minimis* settlement with EPA. EPA is mindful that some parties already have contacted EPA, prior to receipt of this letter, and expressed an interest in pursuing a *de minimis* settlement. EPA requests that any such party confirm with Mr. Egan, within fifteen days of receipt of this letter, whether the party remains interested in pursuing a *de minimis* settlement with EPA.

Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Penske VDA
c/o Penski Corporation
Roger Penski, CEO
13400 Outer Drive, West
Detroit, MI 48239

Re: Malvern TCE Superfund Site

Dear Mr. Penske:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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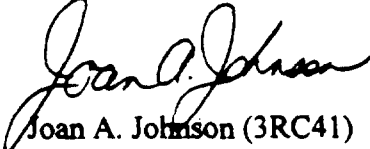
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAR 20 2003

Petrocon Inc.
c/o Safety Kleen Corp.
5400 Legacy Drive
Cluster II, Bldg. 3
Plano, TX 75024

Re: Malvern TCE Superfund Site

Dear Sir or Madam:

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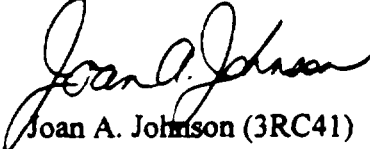
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Philadelphia Steel Drum Co.
Lee Piekutoski, CEO
9 Woodside Drive
Richboro, PA 18954-1802

Re: Malvern TCE Superfund Site

Dear Mr. Piekutoski:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al. v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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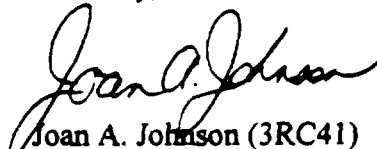
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

DEF
ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Philco Ford Corporation
c/o Space Systems/Loral Inc.
C. Patrick DeWitt, President
3825 Fabian Way
Palo Alto, CA 94303

Re: Malvern TCE Superfund Site

Dear Mr. DeWitt:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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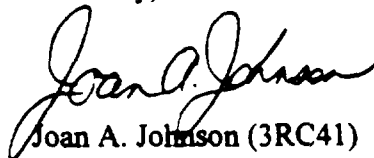
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

PFE
ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Precision Arts Manufacturing
Al Musso
200 West Somerdale Road
Voorhees, NJ 08043

Re: Malvern TCE Superfund Site

Dear Mr. Musso:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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ORIGINAL
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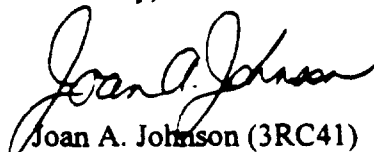
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Assistant Regional Counsel



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Philadelphia, Pennsylvania 19103-2029

VIA UPS

MAR 20 2003

Princo Instruments
Paul Waster, President
1020 Industrial Blvd.
Southampton, PA 18966

Re: Malvern TCE Superfund Site

Dear Mr. Waster:

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(Eg)

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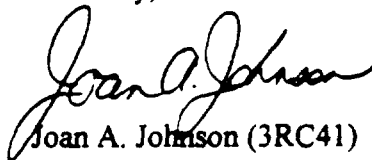
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

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Sincerely,



Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Princo Instruments
c/o Harry Bellwoar, III, Esquire
Schubert, Bellwoar, Mallon & Walheim
Two Penn Center, Suite 1400
1500 John F. Kennedy Boulevard
Philadelphia, PA 19102-1890

Re: Malvern TCE Superfund Site

Dear Mr. Bellwoar:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601 et seq. commonly known as Superfund. Pursuant to a Consent Decree that was entered in December 1999 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

A preliminary review of evidence available to EPA indicates that many of the defendants named in the Litigation may be *de minimis* contributors of hazardous substances to the Site. By *de minimis*, EPA is referring to parties that have made only a minimal contribution (in terms of amount and toxicity) of hazardous substances, in comparison to other hazardous substances at the Site. EPA has issued guidances with regard to settling with *de minimis* contributors of waste to a Site. You may review these guidances at the following web site:
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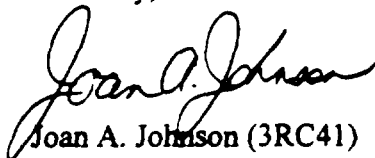
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Prodelin, Inc.
c/o M/A-Com, Inc.
Richard P. Clark, President
1011 Pawtucket Blvd.
Lowell, MA 01853

Re: Malvern TCE Superfund Site

Dear Mr. Clark:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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ORIGINAL
(Red)

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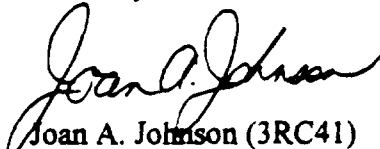
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

2003 MAR 20 10:00 AM

VIA UPS

MAR 20 2003

Quaker City Chemicals
c/o Robert L. Collings, Esq.
Schnader Harrison Segal & Lewis LLP
1600 Market St.
Philadelphia, PA 19103-7286

Re: Malvern TCE Superfund Site

Dear Mr. Collings:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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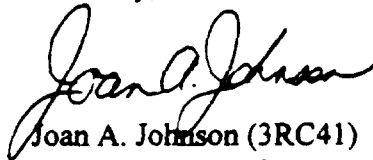
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Quaker City Chemicals, Inc.
Steve Metzman
7360 Milnor Street
Philadelphia, PA 19136

Re: Malvern TCE Superfund Site

Dear Mr. Metzman:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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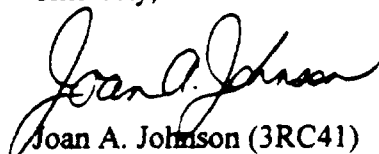
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

RC Kletzing Inc.
Arthur Griesiger, President
1325 Industrial Highway
Southampton, PA 18966

Re: Malvern TCE Superfund Site

Dear Mr. Griesiger:

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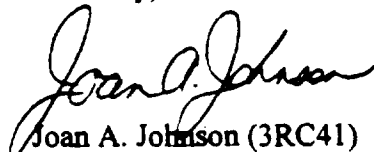
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Resource Technology Services, Inc.
6 Berkeley Road
Devon, PA 19333

Re: Malvern TCE Superfund Site

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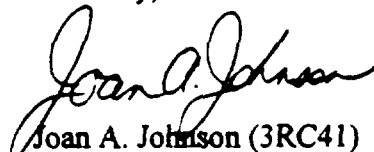
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

ORIGINAL
(Red)

VIA UPS

MAR 20 2003

Sanivan Laboratories
5129 F Street
Philadelphia, PA 19124

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EPA has been contacted by a variety of defendants named in the Litigation, seeking to enter into a *de minimis* settlement with EPA. EPA currently is in the process of evaluating whether and/or with whom EPA would enter into a *de minimis* settlement relating to the Site. Towards this end, EPA requests that any defendant that believes it may qualify for *de minimis* settlement and wishes to pursue such a settlement with EPA contact Patrick Egan, Superfund Civil Investigator, at the following:

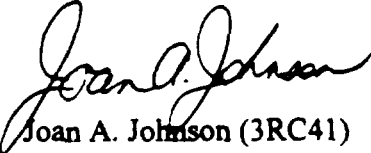
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Sermetal
c/o Teleflex
Joan W. Schwartz, Assistant General Counsel
155 South Limerick Road
Limerick, PA19468

Re: Malvern TCE Superfund Site

Dear Ms. Schwartz:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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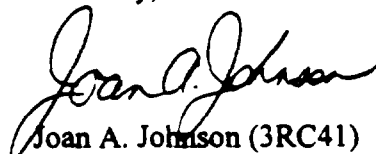
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Shur-Kut Supply Corporation
Joe Saddle, President
7 Mount Pleasant Road
Aston, PA 19014

Re: Malvern TCE Superfund Site

Dear Mr. Saddle:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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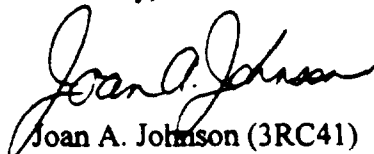
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Simon Wrecking Company, Inc.
c/o Steven Yermish, Esquire
Kaplan & Luber
40 Darby Road
Paoli, PA 19301

Re: Malvern TCE Superfund Site

Dear Mr. Yermish:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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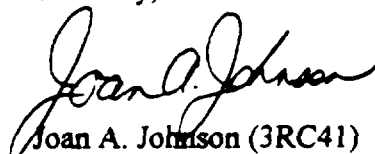
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

2003
MAR 20 2003

VIA UPS

MAR 20 2003

Simon Wrecking Company, Inc.
c/o Simon Resources, Inc.
Samuel Simon, President
2525 Trenton Avenue
P.O. Box 3275
Williamsport, PA 17701

Re: Malvern TCE Superfund Site

Dear Mr. Simon:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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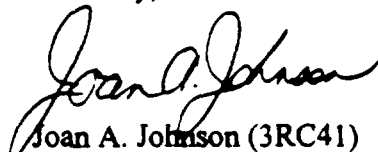
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Singer Co.
3030 Kutztown Road
Reading, PA 19612

Re: Malvern TCE Superfund Site

Dear Sir or Madam:

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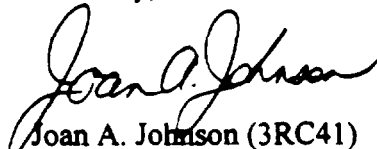
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Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Solid State Scientific
c/o Sprague Electric Company
Felix Zandman, CHB
63 Lincoln Highway
Malvern, PA 19355-4004

Re: Malvern TCE Superfund Site

Dear Mr. Zandman:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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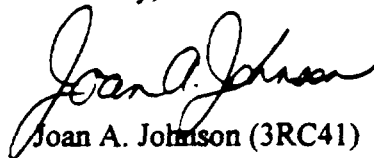
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Sincerely,



Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Specialty Castings Inc.
John Cogwill, President
42 Curtis Avenue
Woodbury, NJ 08096

Re: Malvern TCE Superfund Site

Dear Mr. Cogwill:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, et seq., commonly know as Superfund. Pursuant to a Consent Decree that was entered in December 1999 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you.

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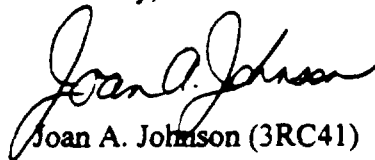
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Storm Weather Products
3621-31 B Street
Philadelphia, PA 19134

Re: Malvern TCE Superfund Site

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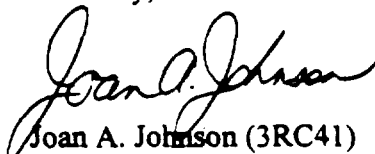
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Technitrol
c/o Andrew S. Levine, Esq.
Stradley Ronon Stevens & Young LLP
2600 Commerce Square
Philadelphia, PA 19103

Re: Malvern TCE Superfund Site

Dear Mr. Levine:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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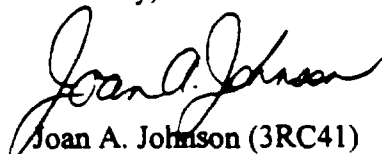
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Technitrol
James M. Papada III, CEO
1210 Northbrook Drive
Suite 385
Trevose, PA 19085

Re: Malvern TCE Superfund Site

Dear Mr. Papada:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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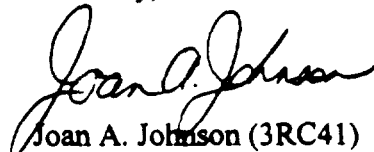
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Tele-Dynamics
c/o United Technologies Corporation
George David, CEO
1 Financial Plaza
Hartford, CT 06103

Re: Malvern TCE Superfund Site

Dear Mr. David:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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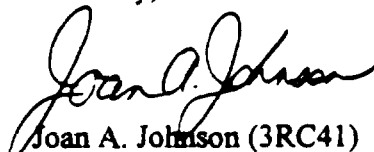
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Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Transicoil Inc.
c/o Horizon Aerospace LLC
William Blossom, President
2560 General Armistead Avenue
Norristown, PA 19403

Re: Malvern TCE Superfund Site

Dear Mr. Blossom:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

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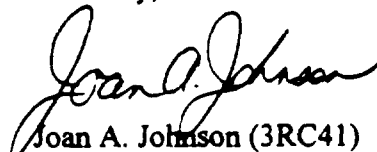
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
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VIA UPS

MAR 20 2003

U.S. Environmental Services
Box 511 Rumbaugh Avenue
Mount Pleasant, PA 15666

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EPA has been contacted by a variety of defendants named in the Litigation, seeking to enter into a *de minimis* settlement with EPA. EPA currently is in the process of evaluating whether and/or with whom EPA would enter into a *de minimis* settlement relating to the Site. Towards this end, EPA requests that any defendant that believes it may qualify for *de minimis* settlement and wishes to pursue such a settlement with EPA contact Patrick Egan, Superfund Civil Investigator, at the following:

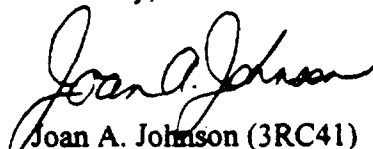
Patrick Egan (3HS11)
United States Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103-2029
(215) 814-3167
egan.patrick@epa.gov

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Please contact Mr. Egan if you would like copies of EPA *de minimis* guidance documents or the referenced Summaries, or have any questions about this matter.

If you are interested in pursuing a *de minimis* settlement with EPA, please notify Mr. Egan of your interest within fifteen days of receipt of this letter. If EPA does not hear from you by that date, EPA will assume that you are not interested in pursuing a *de minimis* settlement with EPA. EPA is mindful that some parties already have contacted EPA, prior to receipt of this letter, and expressed an interest in pursuing a *de minimis* settlement. EPA requests that any such party confirm with Mr. Egan, within fifteen days of receipt of this letter, whether the party remains interested in pursuing a *de minimis* settlement with EPA.

Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

MAR 20 2003

VIA UPS

Waste Consulting & Brokerage Service
128 Nottoway Drive
Blue Bell, PA 19422

Re: Malvern TCE Superfund Site

Dear Sir or Madam:

It has been brought to the attention of the United States Environmental Protection Agency ("EPA") that you have been named as a defendant in a private cost recovery action captioned Action Manufacturing Co., Inc. et al., v. Simon Wrecking Company, et al., Civil Action No. 02-8964 (E.D. Pa.) (the "Litigation").

Upon review of the complaint in that Litigation, it appears that the plaintiffs are seeking to recover the costs of environmental response actions at the Malvern TCE Superfund Site ("Site") in Pennsylvania. As you are probably aware, since the early 1990's, response actions have been conducted by EPA at the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601, et seq., commonly know as Superfund. Pursuant to a Consent Decree that was entered in December 1999 by the United States District Court for the Eastern District of Pennsylvania, a number of responsible parties at the Site agreed to perform the final clean up of hazardous substances at the Site. Those performing parties are the plaintiffs that have sued you

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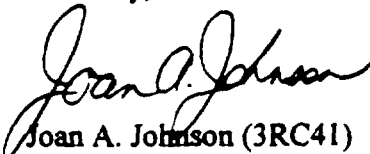
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Sincerely,


Joan A. Johnson (3RC41)
Assistant Regional Counsel



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

VIA UPS

MAR 20 2003

Xynatech Inc.
James T. Redd, President
545 Vortex Road, NE
Rio Rancho, NM 87124

Re: Malvern TCE Superfund Site

Dear Mr. Redd:

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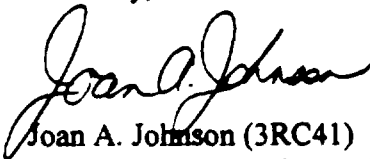
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