

Donald L. James
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 John P. Cunningham
 James B. James
 Michael B. Maguire

Joseph R. Swift
 James P. Reunert
 Michael E. Bub
 Steven D. Asher
 James R. Cantalin
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 Kenneth M. Burke
 Melanie B. Tamaky
 Greg J. Erickson
 John P. Rahoy
 Teresa W. Jeffery
 Agota Peterfy
 Bart B. Zuckerman
 Christopher D. Syrup
 Christina E. Dubis
 Laurie S. Wright
 Stephen P. Krchma
 Darlene V. Kuhlman
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 Matthew J. Lawson
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 Jason M. Krebs
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 Michelle M. Clark
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 * Missouri and Kansas
 * Missouri, Illinois and
 District of Columbia
 * Missouri, Illinois and
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May 15, 2000

Writer's Direct Dial: (314) 242-5379

E-mail: SKrchma@bjpc.com

Mr. Alex Chen
 Assistant Regional Counsel
 U.S. Environmental Protection Agency
 Region VII, 901 North 5th Street
 Kansas City, Kansas 66101

105332

Site: <u>Riverfront Site</u>
ID #: <u>MO0981720246</u>
Book: <u>11.6</u>
Other: <u>Leader Publishing Co</u>
<u>5-15-2000</u>

RECEIVED
 MAY 16 2000

Re: Riverfront Ground Water Contamination Superfund Site in New Haven, Missouri

Dear Mr. Chen:

As you are aware, I represent Leader Publishing Company in the matter referenced above. Pursuant to our earlier agreement, Leader Publishing Company was given an extension of time until May 15, 2000 to respond to the information request for this site. See Attachment 1. Accordingly, the enclosed response of Leader Publishing Company is now provided, see Attachment 2.

It should be noted that by providing this response, Leader Publishing Company does not waive any of its objections to the overly broad, irrelevant, and immaterial nature of the directions, definitions, or requests contained in this information request. Any inquiries concerning this matter to Leader Publishing Company or its present or former officers or employees, must be addressed to me as attorney for Leader Publishing Company. If you have any questions concerning any aspect of Leader Publishing Company's responses, as attached hereto, please do not hesitate to contact me.

Sincerely,

Stephen P. Krchma

Stephen P. Krchma

SPK/kkk/7087582
 Enclosure



S00103827
 SUPERFUND RECORDS

City Center Square
 1100 Main Street, Suite 1900
 Kansas City, Missouri
 64105-2153
 (816) 472-0800
 Fax (816) 471-1183

LeChien Building
 120 West Main
 Belleville, Illinois
 62220-1502
 (618) 235-5590
 Fax (618) 235-5501

318 Park Central East
 Suite 202
 Springfield, Missouri
 65806
 (417) 831-1412
 Fax (417) 831-6003

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▲ Missouri, Illinois and
District of Columbia
● Missouri, Illinois and
Kansas

April 12, 2000

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Mr. Alex Chen
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region VII, 901 North 5th Street
Kansas City, Kansas 66101

Re: Riverfront Ground Water Contamination Superfund Site in New Haven, Missouri

Dear Mr. Chen:

Based upon our recent telephone conversations, it is understood that Leader Publishing Company has been given an extension of time until May 15, 2000, to respond to the information requested for the site referenced above. Your cooperation in this regard is appreciated.

In the meantime, if there are any questions related to Leader Publishing Company on this matter, please do not hesitate to contact me at (314) 242-5379.

Sincerely,

Stephen P. Krchma

SPK/kkk/7078457

Attachment 1

City Center Square
1100 Main Street, Suite 1900
Kansas City, Missouri
64105-2153
(816) 472-0800

LeChien Building
120 West Main
Belleville, Illinois
62220-1502
(618) 235-5590

318 Park Central East
Suite 202
Springfield, Missouri
65806
(417) 831-1412

Responses to
Information Request to Leader Publishing Company

I. General Information About Respondent

- A. Identify the person(s) answering this Information Request on behalf of Leader Publishing Company. (See the definition of the word "identify" in the Definitions section of this Information Request.)

Response: Thomas C. Anderson, President, Leader Publishing Company, 1101 Miller Street, New Haven, Missouri 63068, phone 573/237-3027

- B. Describe all sources reviewed or consulted in responding to this Information Request, including but not limited to:

- 1) the names of all individuals consulted;
- 2) the job title and job description of each individual consulted;
- 3) whether each person consulted is a current or past employee of Respondent;
- 4) the nature of all documents reviewed;
- 5) the locations where those documents reviewed are located.

Response: Eugene H. Anderson, retired President of Leader Publishing Company.

2. Respondent's Legal Status and Relationship with Other Companies

- A. Identify Leader Publishing Company's date of incorporation, state of incorporation and registered agent for service of process.

Response: Leader Publishing Company incorporated 1960 State of Missouri, Eugene H. Anderson registered agent.

- B. State the names of Leader Publishing Company's "corporate officers" during the entire period of its operations in New Haven. The term "corporate officers" includes, but is not limited to, any president, chief executive officer, vice president, partner, secretary, and treasurer of Leader Publishing Company.

Response: Eugene H. Anderson, President 1960-1985
Wilbur J. Lefmann, Secretary 1960-1985

Beulah Anderson, President 1986-1993
Thomas C. Anderson, Secretary 1986-1993

Thomas C. Anderson, President 1994-
Patricia A. Anderson, Secretary 1994-

A. H. Anderson
2

C. State the exact nature of Respondent's current and past relationship (if any) with the following entities and provide documentation of the relationship, including, but not limited to any relevant purchase agreements or contracts; merger or consolidation agreements or contracts; articles of dissolution (of the following companies); joint venture agreements; and/or leasing agreements. Provide the dates upon which any relationships commenced and the dates upon which any relationships were terminated.

- 1) The Wenzel Company;
- 2) H. Wenzel Tent & Duck Company;
- 3) The Machine Shop;
- 4) New Haven Manufacturing Company;
- 5) American Recreation Products, Inc.;
- 6) Kellwood Company;
- 7) Hawthorn Finishing Company;
- 8) Riverfront Industries, Inc.;
- 9) Transportation Specialists, Inc.;
- 10) Citizens' Bank of New Haven;
- 11) Metalcraft Enterprises;
- 12) MarChem Coated Fabrics, Inc.

Response: Sold commercial printed matter to all of the firms listed. The printed matter consisted of items such as letterheads, envelopes, instruction sheets and labels.

D. State the names of any "corporate officers" for the companies listed in 2C. that have also served at any time as "corporate officers" for Leader Publishing. In addition, to the extent possible, name any other "corporate officers" for the companies listed in 2C. and state the dates when they served in such capacity. The term "corporate officers" includes, but is not limited to, any president, chief executive officer, vice-president, partner, secretary, and treasurer.

Response: None

E. If Respondent is, or was a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity not mentioned in 2C. during the period of its operations in New Haven, then identify such company or entity and describe the nature of each such corporate relationship including, but not limited to:

- 1) a general statement of the nature of the relationship;
- 2) the dates such relationship existed;
- 3) the percentage of ownership of Respondent held by such other entity; and
- 4) for each such affiliated entity provide the names and complete addresses of its parent, subsidiary and otherwise affiliated entities.

Response: Not Applicable

F. If Respondent no longer exists as the same legal entity it was during its period of operations in New Haven due to asset purchases or mergers, provide:

- 1) the documents that embody the terms of such transactions (i.e., purchase agreements, merger and dissolution agreements, etc.);
- 2) the identities of the seller, buyer and any other parties to such transactions; and
- 3) a brief statement describing the nature of the asset purchases or mergers.

Response: Not Applicable

3. Respondent's Operations at the Cottonwood Street Property

A. Provide a brief description of the nature of Respondent's operations at tile Cottonwood Street property including:

- 1) the date such operations commenced;
- 2) the types of work previously or currently performed including, but not limited to, the industrial, chemical or institutional processes undertaken at each location and the products Respondent manufactured, recycled, recovered, treated or otherwise processed in the operations at the Cottonwood Street property;
- 3) the names of supervisors and/or other Leader Publishing employees who worked or are working at the Cottonwood Street property during this time.

Response: In 1975 Leader Publishing Company rented a vacant building at 1102A Miller Street and used the building as a warehouse to store paper inventory. In 1980 Leader Publishing Company purchased this property and in 1990 erected a commercial printing plant on this site. Thomas C. Anderson and Kevin Murdock, lead pressman, are knowledgeable supervisors/employees on current operations.

B. If the nature or size of Respondent's operations at the Cottonwood Street property changed over time, describe those changes and the dates they occurred.

Response: See Response to Request 3.A above.

C. State the extent of Respondent's knowledge about the following individuals, i.e., whether each works for or ever worked for Leader Publishing at the Cottonwood Street property; the dates of employment; job description; and current addresses and telephone numbers (if available). State whether each individual ever handled or disposed of perchloroethene or tetrachloroethene (PCE) or trichloroethene (TCE), or materials containing PCE or TCE at the Cottonwood Street property.

- 1) Gene Anderson;

- 2) Tony Bauer;
- 3) Dennis Bean;
- 4) Wayne Book;
- 5) Don Brandt;
- 6) Kevin Busch;
- 7) Jerry Dotson;
- 8) Lee Downey;
- 9) Melvin Duvall;
- 10) John Englebreit;
- 11) Junior Gallagher;
- 12) Julius Gatzemeyer;
- 13) Roy Gerdes;
- 14) Earl Hedgedorn;
- 15) Marvin Horstmann;
- 16) William Kelley;
- 17) Dale Koch;
- 18) Midge Krull;
- 19) Steven Kubiak;
- 20) Gary Kuhn;
- 21) Bernell Kuschel;
- 22) Kenneth Kuschel;
- 23) Lenny Landsbaum;
- 24) Matt Lipsinger;
- 25) Melvin Menke;
- 26) Anthony Meyer;
- 27) Dale Mocabee;
- 28) Richard Monzyk;
- 29) Robert Monzyk;
- 30) Chester Nichols;
- 31) Archie Oberg;
- 32) Art Pecaut;
- 33) Philip Pecaut;
- 34) John Peirick;
- 35) Marvin Pointer;
- 36) Thomas Pollihan;
- 37) John Pruessner;
- 38) Harold Rethemeyer;
- 39) Marvin Schroeder;
- 40) Al Sheedy;
- 41) Fritz Steinbeck;
- 42) John Steinbeck;
- 43) Eskei Tinhouse;
- 44) Eugene Vedder;
- 45) Roland Vedder;
- 46) Fred Wenzel;
- 47) Richard Wilier;

- 48) Robert Winship;
- 49) Michael Wiser.

Response: Eugene H. Anderson, aka Gene Anderson, President of Leader Publishing Co., 1960-19

To his knowledge, Mr. Anderson never handled or disposed of PCE, TCE or materials containing those substances on the Leader Publishing Company property.

D. State whether PCE, TCE, or materials containing PCE or TCE, have ever been used, sold, stored, or otherwise handled in any way during Respondent's operations at the Cottonwood Street property. If so, for each type of PCE or TCE material used, please provide the following information:

- 1) the chemical name and composition, trade name, and local and/or Federal registration number of any such materials, if any;
- 2) copies of Material Safety Data Sheets (MSDS) for such materials;
- 3) the time period(s) during which these materials were used;
- 4) the purpose(s) for using these materials (for example, cleaning and maintenance of equipment and machinery, cleaning spills of liquid or solid materials, etc.);
- 5) the rate at which such materials were used (e.g., in gallons per year);
- 6) the estimated total volume used of such materials during Respondent's operations at the Cottonwood Street facility;
- 7) the names of Leader Publishing employees who might have used such materials at the Cottonwood Street facility.

Response: Leader Publishing Company is not aware of any such use of PCE or TCE materials.

E. If PCE, TCE, or materials containing PCE or TCE, have ever been used, sold, stored, disposed of, or otherwise handled at Respondent's Cottonwood Street property during this time, identify the supplier(s) and transporters of such materials to the facility. Provide copies of any and all contracts, service orders, purchase orders, shipping manifests, invoices, receipts, and/or other documents pertaining to the supplying of these materials to the Cottonwood Street property.

Response: Not Applicable

F. For each type of spent or waste materials containing PCE or TCE that were generated at Respondent's Cottonwood Street property, describe Respondent's methods for disposal, treatment, storage, recycling, and/or sale of such materials. Such information must include, but not be limited to;

- ~~1) the names of any individuals and/or companies that were contracted to or otherwise responsible for picking up, transporting or otherwise disposing~~

- of such waste materials;
- 2) any contracts, agreements, invoices, receipts or other documents which memorialize any such disposal arrangements for these waste materials;
- 3) the dates such waste materials were picked up, transported, or disposed of;
- 4) the ultimate disposal location of such waste materials;
- 5) the rate at which such waste materials were being generated at the Cottonwood Street property (e.g., in gallons per year);
- 6) the total quantity of waste materials generated during Respondent's operations at the Cottonwood Street property.

Response: Not Applicable

G. State whether any material containing PCE or TCE from the Cottonwood Street property was ever buried, spilled, dumped, leaked, or otherwise released on either the premises, or the City of New Haven Landfill near Highway 100 and Industrial Park Road, or any other location in New Haven. If so, please provide the dates and locations of such releases. Identify any current or former Leader Publishing employees who might have performed such activities or who might have further knowledge on this matter.

- 1) If materials containing PCE or TCE had been sent to the City of New Haven Landfill, state where these materials were sent following the City's closure of this landfill.

Response: Leader Publishing has no direct knowledge of releases of materials containing PCE or TCE.

H. Describe the extent of Respondent's knowledge about any other industrial and manufacturing operations at the Cottonwood Street property including:

- 1) the date such operations commenced and concluded;
- 2) the companies or entities conducting such operations;
- 3) the types of work performed including, but not limited to, the industrial, chemical or institutional processes undertaken at each location and the products manufactured, recycled, recovered, treated or otherwise processed in the operations at the Cottonwood Street property;
- 4) the names of any individuals who worked at the Cottonwood Street property during this time;
- 5) whether PCE, TCE, or materials containing PCT, or TCE, were ever used, sold, stored, or otherwise handled in any way in these operations;
- 6) how any spent or waste materials containing PCE that were generated in these operations were disposed, treated, stored, recycled, and/or sold.

Response: Leader Publishing Company has no direct knowledge of previous uses of this property.

4. Respondent's Knowledge About Operations at Other Locations in New Haven

A. Describe the extent of Respondent's knowledge about any industrial and manufacturing operations at, and possible chemical contamination or other environmental problems associated with, the following locations in New Haven:

- 1) Orchard Street property;
- 2) Maupin Avenue property;
- 3) Industrial Drive property.

Response: Leader Publishing Company has no direct knowledge of operators at these locations.

5. Information About Others

A. If you believe that there may be other persons able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

Response: Leader Publishing Company has no basis for and has therefore formed no belief as to other persons with more information on other parcels of the Cotton Wood Street property or other locations in new Haven, Missouri beyond the individuals listed in Request 3.C above.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of Missouri

County of Franklin

SS:

I certify under penalty of law that I personally examined and am familiar with the information submitted in this document (Response to EPA Request for Information) and all documents submitted herewith, and that based upon my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

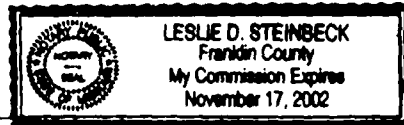
THOMAS C. ANDERSON
NAME (print or type)

PRESIDENT
TITLE (print or type)

[Signature]
SIGNATURE

Sworn to before me on this
11th day of May, 2000.

[Signature]
NOTARY PUBLIC



My Commission Expires: 11-17-02