

TRANSPORTATION EAST INC.); ROBERTSON)
TANK LINES (now known as TRIMAC)
TRANSPORTATION GROUP INC.); RYDER)
BULK TRANSPORTATION SERVICES (now)
known as TRIPLUS INC.) AND TRIMAC BULK)
TRANSPORTATION, INC. (now known as)
TRIPLUS INC.); UNION CARBIDE)
CORPORATION; UNION PACIFIC RAILROAD)
CO.; LAND NAVIGATOR, LTD.; and the)
Defendants Listed in Appendices F and G)
(excluding the Texas Commission on Environmental)
Quality),)
Defendants)
_____)

COMPLAINT

The United States of America, by the authority of the Attorney General of the United States, by and through the undersigned attorneys, acting at the request of the Administrator of the United States Environmental Protection Agency (“EPA”), of the National Oceanic and Atmospheric Administration (“NOAA”), and of the Fish and Wildlife Service of the United States Department of the Interior (“FWS”), alleges as follows:

NATURE OF THE ACTION

1. This is a civil action pursuant to Sections 106 and 107 of the Comprehensive Environmental Response, Compensation, and Liability Act (“CERCLA”), 42 U.S.C. §§ 9606 and 9607, regarding the Malone Service Company Superfund Site, located at 5300 Campbell Bayou Road in Texas City, Texas (the “Site”).

2. Pursuant to CERCLA Section 106, 42 U.S.C. § 9606, the United States seeks injunctive relief requiring the performance of response actions at the Site consistent with the National Contingency Plan, 40 C.F.R. Part 300. Pursuant to CERCLA Section 107, 42 U.S.C. § 9607, the United States seeks to recover unreimbursed costs incurred or to be incurred by the United States for response actions taken in connection with the Site. Pursuant to CERCLA Section 107, 42 U.S.C. § 9607, the United States seeks to recover damages for injury to, destruction of, or loss of natural resources, including the reasonable costs of assessing such injury, destruction, or loss. Pursuant to CERCLA Section 113(g)(2), 42 U.S.C. § 9613(g)(2), the United States seeks a declaratory judgment, binding in any subsequent action by the United

States to recover further response costs, that the Defendants are liable for future response costs incurred by the United States in connection with the Site.

JURISDICTION AND VENUE

3. This Court has jurisdiction over the subject matter of this action pursuant to 42 U.S.C. Sections 9606(a) and 9613(b) and 28 U.S.C. Sections 1331 and 1345.

4. Venue is proper in this District pursuant to 42 U.S.C. Sections 9606(a) and 9613(b) and 28 U.S.C. Sections 1391(b) and (c) and 1367 because the release or threatened release of hazardous substances that gives rise to the action occurred in this District.

DEFENDANTS

5. Defendants are “persons” within the meaning of Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

GENERAL ALLEGATIONS

6. The Site encompasses approximately 150 acres near Galveston Bay and Swan Lake, approximately 1.6 miles southeast of the intersection of State Highway Loop 197 and State Highway 3, in Texas City Texas.

7. From approximately 1964 until 1996, the Malone Service Company stored and treated or disposed of hazardous substances on portions of the Site. A large number of companies sent approximately 481 million gallons (11.45 million barrels) of waste to the Site. The predecessor to the Texas Commission for Environmental Quality (“TCEQ”) revoked the Malone Services Company’s permits in 1997. The Site no longer receives hazardous wastes.

8. EPA listed the Site on the National Priorities List on June 14, 2001. 66 Fed. Reg. 32,235, 32,238 (June 14, 2001) (Table 1). Pursuant to an Administrative Order on Consent

signed by EPA on September 30, 2003, a group of potentially responsible parties (“PRPs”), completed the remedial investigation/feasibility study (“RI/FS”) for the Site. On September 29, 2009, EPA executed the Record of Decision selecting the remedial action to be carried out at the Site.

9. The main hazardous substances at the Site are metals, volatile organic chemicals, semi-volatile organic chemicals, dioxins, and polychlorinated biphenyls.

10. The estimated cost of the remedial action is \$56.4 million.

11. There was a “release” or a threatened “release” within the meaning of Section 101(22) of CERCLA, 42 U.S.C. § 9601(22), of “hazardous substances” within the meaning of Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), into the environment at and from the Site.

12. The Site is a “facility” within the meaning of Section 101(9) of CERCLA, 42 U.S.C. § 9601(9).

FIRST CLAIM FOR RELIEF
(U.S. Claim for Response Costs)

13. Paragraphs 1 and 3–12 are re-alleged and incorporated herein by reference.

14. Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), provides in pertinent part as follows:

subject only to the defenses set forth in subsection (b) of this section . . .

(3) any person who by contract, agreement, or otherwise arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such person, by any other party or entity, at any facility or incineration vessel owned or operated by another party or entity and containing such hazardous substances . . .

from which there is a release, or a threatened release which causes the incurrence of response costs, of a hazardous substance, shall be liable for —

(A) all costs of removal or remedial action incurred by the United States Government or a State or an Indian tribe not inconsistent with the national contingency plan

15. Defendants are persons, or the successors to persons, who arranged for the disposal or treatment, or the transport for disposal or treatment, of hazardous substances within the meaning of Sections 107(a)(3) of CERCLA, 42 U.S.C. § 9607(a)(3).

16. The actions taken by the United States in connection with the Site constitute “response” actions within the meaning of Section 101(25) of CERCLA, 42 U.S.C. § 9601(25), in connection with which the United States has incurred costs.

17. The costs incurred by the United States in connection with the Site are not inconsistent with the national contingency plan, codified at 40 C.F.R. Part 300.

18. Pursuant to Section 107(a)(3) of CERCLA, 42 U.S.C. § 9607(a)(3), Defendants are jointly and severally liable to the United States for all unreimbursed response costs incurred and to be incurred by the United States in connection with the Site, including enforcement costs and prejudgment interest.

SECOND CLAIM FOR RELIEF
(Declaratory Judgment for U.S. Under CERCLA § 113)

19. Paragraphs 1 and 3–18 are re-alleged and incorporated herein by reference.

20. CERCLA Subsection 113(g)(2), 42 U.S.C. § 9613(g)(2), states that in any action for recovery of costs under CERCLA Section 107, 42 U.S.C. § 9607, “the court shall enter a declaratory judgment on liability for response costs . . . that will be binding on any subsequent action or actions to recover further response costs.”

21. The United States will continue to incur response costs associated with the contamination at the Site, including governmental enforcement costs that are recoverable under CERCLA. The United States is entitled to entry of a declaratory judgment that each of the

Defendants is jointly and severally liable to the United States for future response costs incurred in connection with the Site.

THIRD CLAIM FOR RELIEF

(U.S. Claim for Abatement Under CERCLA § 106)

22. Paragraphs 1 and 3–12 are re-alleged and incorporated herein by reference.

23. The United States Environmental Protection Agency has determined that there is or may be an imminent and substantial endangerment to the public health or welfare or the environment because of actual or threatened releases of hazardous substances at and from the Site.

24. Pursuant to Section 106(a) of CERCLA, 42 U.S.C. § 9606(a), each Defendant is subject to injunctive relief to abate the danger presented by releases or threatened releases of hazardous substances at and from the Site.

FOURTH CLAIM FOR RELIEF

(U.S. Claim for Natural Resource Damages Under CERCLA)

25. Paragraphs 1 and 3–12 are re-alleged and incorporated herein by reference.

26. Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), provides in pertinent part as follows:

subject only to the defenses set forth in subsection (b) of this section . . .

(3) any person who by contract, agreement, or otherwise arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, of hazardous substances owned or possessed by such person, by any other party or entity, at any facility or incineration vessel owned or operated by another party or entity and containing such hazardous substances . . .

from which there is a release, or a threatened release which causes the incurrence of response costs, of a hazardous substance, shall be liable for . . .

(C) damages for injury to, destruction of, or loss of natural resources, including the reasonable costs of assessing such injury, destruction, or loss resulting from such a release

27. The release or threatened release of hazardous substances at and from the Site caused injury to, destruction of, or loss of natural resources within the meaning of Section 101(16) of CERCLA, 42 U.S.C. § 9601(16).

28. NOAA and the FWS are federal agencies that have been designated as natural resource trustees pursuant to CERCLA Section 9607(f), 42 U.S.C. § 9607(f).

29. NOAA and the FWS have incurred costs assessing such injury, destruction, or loss.

30. Pursuant to Section 107(a)(4)(C) of CERCLA, 42 U.S.C. § 9607(a), each Defendant is jointly and severally liable to the United States for injury to, destruction of, or loss of natural resources, including the reasonable costs of assessing such injury, destruction, or loss resulting from actual or threatened releases of hazardous substances at and from the Site.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, the United States of America prays that this Court:

1. Enter judgment in favor of the United States and against Defendants, jointly and severally, for all costs, including prejudgment interest, incurred by the United States for response actions in connection with the Site and not otherwise reimbursed;

2. Order the Defendants to abate the conditions at the Site by implementing the remedial action selected by EPA in the Record of Decision for the Site;

3. Enter judgment in favor of the United States and against Defendants, jointly and severally, for all damages for injury to, destruction of, and loss of natural resources within the

trusteeship of the United States resulting from the releases or threatened releases of hazardous substances at or from the Site including the unreimbursed past, present, and future costs of assessing such damages, the cost of restoring, replacing, and/or acquiring the equivalent of those injured resources, and the past, present, and future diminution in value of those resources pending restoration or replacement;

4. Enter a declaratory judgment that Defendants are liable, jointly and severally, for all future response costs incurred by the United States in connection with the Site;
5. Award the United States its costs in this action; and
6. Grant such other relief as the Court deems just and proper.

Respectfully submitted,

FOR THE UNITED STATES OF AMERICA

~~ROBERT G. DREHER~~
Acting Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice

Attorney-in-Charge

s/ Robert R. Klotz
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[The Only Appendices to this Complaint are Appendices F and G]

APPENDIX F

MAJOR CASHOUT DEFENDANTS
Braskem America, Inc., f/k/a Braskem PP Americas Inc., f/k/a Sunoco Chemicals, Inc., f/k/a Aristech Chemical Corporation
General Dynamics Corporation
Mitsubishi Corporation, to the extent liable at the Site for the liability of Aristech Chemical Corporation or the former USS Chemicals Division of United States Steel Corporation
Sunoco, Inc., to the extent liable at the Site for the liability of Aristech Chemical Corporation or the former USS Chemicals Division of United States Steel Corporation, or for the liability of Mitsubishi Corporation for liability of Aristech Chemical Corporation or the former USS Chemicals Division of United States Steel Corporation
United States Steel Corporation, Tenn-USS Chemicals Co., USS Chemicals 30463, and USS Chemicals Novamont Division

APPENDIX G

DE MINIMIS CASHOUT DEFENDANTS
Akzo Nobel Inc., as successor to Akzona, Akzo Chemie America, and Arma Company
Akzo Nobel Chemicals Inc. (f/k/a Akzo Chemicals Inc.), as successor to Texas Alkyls, Inc.
Akzo Nobel Paints LLC (f/k/a The Glidden Company), as successor to The Grow Group Inc., Devoe & Reynolds Co. Inc., and Napko Corp.
Ametek, Inc.
Aviall Services, Inc. and Aviall, Inc.
AZZ Group, LP, Automatic Processing, Inc., Aztec Manufacturing Partnership Ltd., Aztec Industries Inc., and International Galvanizers Partnership Ltd.
Beazer East, Inc. (f/k/a Koppers Company, Inc.)
Brilliant National Services, Inc., Brenntag, Inc., and Brenntag Southwest, Inc. (f/k/a Delta Distributors, Inc.)
Cargill, Incorporated
CenterPoint Energy, Inc., Houston Lighting & Power Company, Houston Industries Incorporated, Reliant Energy, Incorporated, Texas Genco Holdings, Inc., Texas Genco, LP, CenterPoint Energy, Inc., CenterPoint Energy Houston Electric, LLC, NRG Texas Power LLC, and NRG Energy, Inc.
Channel Shipyard Co., Inc.
Chatleff Controls, Inc. and Henderson Controls, Inc.
Chemical Exchange Industries, Inc. and Texmark Chemicals, Inc.
Coastal Transport Co., Inc.
Commercial Metals Company and CMC Steel Fabricators, Inc. d/b/a CMC Safety Railway Services Inc.
Crown Holdings, Inc., Crown Cork and Seal Company, Inc., Continental Can Company, and Crown Beverage Packaging, Inc.
Eastman Chemical Company, McWhorter Chemical, McWhorter, Incorporated, and McWhorter Technologies, Incorporated
Elk Corporation (a/k/a Elk Corporation of America), Elk Corporation of America (f/k/a DVA Corporation and Elk Roofing Products, Inc.), Elk Premium Building Products, Inc., and Elk Technology Group, Inc.
EPCO, Inc., Enterprise Products Company, Enterprise Transportation Co., Enterprise Petrochemical Co., and Can-Go Corp.
Fin-Tech Inc.
Flint Group Incorporated (f/k/a Flint Ink Corporation)
Furniture Brands International, Inc. and Broyhill Furniture Industries, Inc.
General Electric, Betz Laboratories, GE Carboloy, GE Silicone Carbide Products, and UNC Aerostructures (Weatherford Aerospace, Inc.)
Gergiel LLC d/b/a Houston Lead Co.

Giles Webster, Inc. and Giles Volkswagen, Inc. d/b/a Giles Volkswagen, Giles Volvo, Giles Volkswagen-Volvo
Griffin Corporation of Valdosta
Gulf Grinding Co. Inc.
Heartland Cement Company
Hercules Incorporated
Honeywell International Inc.
Huntsman Corp., Rexene Chemical Co., Rexene Co., Rexene Polyolefins, El Paso Products Co., Texaco Chemical Co., and Jefferson Chemical Co.
Illinois Tool Works, Inc. and Childers Products Co.
International Paint LLC, as successor to International Paint Inc.
International Paper Company, Champion International, and St. Regis Paper Company
Iron Mountain Information Management, Inc. and Iron Mountain Pacific Records Mgmt., Inc.
Kaspar Electroplating, Inc.
Kinder Morgan Liquids Terminals, LLC, Unitank Terminal Services, Kinder Morgan Texas Pipeline L.P., and Kinder Morgan Liquids Terminals, LLC
Kinder Morgan Texas Pipeline LLC, United Texas Transmission Company, and Kinder Morgan Texas Pipeline L.P.
Kraft Foods Global, Inc., as successor in interest to Dart & Kraft, Inc. and Maxwell House Coffee Co.
Lincoln Property Company
Lockheed Martin Corp. and Lockheed Missiles & Space Co.
Lonza Inc.
Loveland Products, Inc., as successor in interest to Transbas, Inc., and Agrium Inc., Agrium U.S. Inc., AGU US Holdings Inc., and United Agri Products Inc.
Lufkin Path Forward, Inc. (f/k/a Cybershield, Inc., Cybershield of Texas, Inc., Cybershield International, Inc., and Lufkin Path Forward International, Inc.), and Chromium Corporation
Matheson Tri-Gas, Inc. and Matheson Gas Products, Inc.
National Oilwell Varco, LP, AMF Tuboscope Inc., Best Industries Inc., Hydra-Rig Inc., Varco/Best Flow Products, Varco, LP, and National Oilwell Varco, LP
Nunez Construction Co., Inc. and Piling, Inc.
P Chem, Inc., a/k/a P Chem Inc., and Chemical Manufacturing Exchange, Inc.
PACCAR Inc.
Pfizer Inc., Pharmacia & Upjohn Co. LLC, and Upjohn Company LLC
Phoenix Oil, Inc.
Pilot Chemical and Pilot Industries of Texas, Inc.
PPG Industries, Inc.
Praxair, Inc., Fusion, Inc., and the former Linde Division of Union Carbide Corp.
PVI Industries
Reagent Chemical & Research, Inc.
Reichhold, Inc. (f/k/a Reichhold Chemicals, Inc.)
Rexam Beverage Can Company (f/k/a American National Can Company, f/k/a National Can Corporation) and Rexam PLC

Shell Oil Company, Pennzoil-Quaker State Company d.b.a. SOPUS Products, and Shell Chemical LP (collectively the Royal Dutch Shell group), and Marathon Morco Co., Marathon Morco Co./Penreco Morco Co., Pennzoil Co., Pennzoil Sulphur Co., Penreco, Penreco Morco, Shell Chemical Co., Shell Development Co., Shell Oil Co., Shell Pipeline (Hope Houston Pipeline)
Service Transport Company
SolvChem, Inc. (f/k/a Solvents & Chemicals, Inc.)
Southwest Galvanizing Inc.
Syngenta Crop Protection, LLC, Syngenta, AstraZeneca, Velsicol, and Sandoz
Syntech Chemicals, Inc.
Texas Commission on Environmental Quality
The Sherwin-Williams Company
Trinity Industries, Inc. and Platzer Shipyard, Inc.
Valero Energy Corporation, Diamond Shamrock Refining and Marketing Company (n/k/a Valero Retail Holdings, Inc.), Sigmor Corporation, TPI Petroleum, Inc. (f/k/a Total Petroleum, Inc.), and Ultramar Inc.
Valley Solvent Company Inc. d/b/a Valley Solvent and Chemicals
VAM USA, LLC, successor to VAM PTS Co.
Womble Company, Inc.

CERTIFICATE OF SERVICE

I hereby certify that, on this day, I caused true and correct copies of the foregoing *Complaint* to be served by first class mail, postage prepaid, on the following:¹

Recipient of Service	Party
Steve Jawetz Beveridge & Diamond PC 1350 I St., N.W., Suite 700 Washington, DC 20005 3311 Phone: (202) 789-6045	CD Appendix D Parties – Principal Settling Defendants and Land Navigator, Ltd. – Alcoa Inc.; – Atlantic Richfield Company, BP America Production Company, BP Amoco Chemical Company, BP Products North America Inc., and Welchem, Inc.; – Baker Hughes Inc., Baker Petrolite Corporation, and Baker Hughes Oilfield Operations, Inc.; – BASF Corporation; – Champion Technologies, Inc. (f/k/a Champion Chemicals, Inc.); – Chevron U.S.A. Inc.; – Dixie Chemical Company, Inc.; – Exxon Mobil Corporation, Mobil Oil Exploration & Producing Southeast Inc., Mobil Exploration and Producing North America Inc., Mobil Producing Texas & New Mexico Inc., Mobil Research and Development Corporation, Mobil Business Resources Corporation, The Superior Oil Company, Mobil Oil Corporation (now known as ExxonMobil Oil Corporation), Mobil Exploration and Producing Services Inc., Mobil Corporation, Exxon Technology Holding Corp., Reliance Electric Company, Exxon Biomedical Sciences, Inc. (now known as ExxonMobil Biomedical Sciences, Inc.), Exxon Research and Engineering Company (now known as ExxonMobil Research and Engineering Company), Exxon Pipeline Company (now known as ExxonMobil Pipeline Company), Exxon Coal USA, Inc. (now known as ExxonMobil Coal USA Inc.), Exxon Production Research Company (now known as ExxonMobil Upstream Research Company), Exxon Chemical Services Americas Inc. (now known as ExxonMobil Chemical Services Americas Inc.), and Friendswood Development Company (now known as Exxon Land Development, Inc.); – FMC Corporation;

¹ All Defendants. have agreed to accept service by mail and to waive the formal service requirements set forth in Rule 4 of the Federal Rules of Civil Procedure and any applicable local rules of this Court, including but not limited to, service of a summons. (See Paragraph 135 of the Consent Decree lodged simultaneously with the filing of this Complaint.)

	<ul style="list-style-type: none"> - Groendyke Transport, Inc.; - Halliburton Energy Services, Inc. and DII Industries, Inc. - Land Navigator, Ltd. - Marathon Oil Company - Mission Petroleum Carriers, Inc. - Nalco Company - Occidental Chemical Corporation as a successor to Diamond Shamrock Chemicals Company - Perma-Fix Environmental Services, Inc. - Pharmacia Corporation (f/k/a Monsanto Company) - Quality Carriers, Inc. as successor to Chemical Leaman Tank Lines, Inc., Montgomery Tank Lines, Inc., and United Express - Quality Distribution, Inc - Rohm and Haas Company, Rohm and Haas Texas Incorporated, Rohm and Haas Chemicals LLC, and Morton International, LLC - Texaco, Inc. - Texas Instruments Incorporated - The Dow Chemical Company - The Goodyear Tire & Rubber Company - Trimac Transportation, Inc., Ameri-Liquid Transport, Inc., DSI Transports, Inc. (now known as Trimac Transportation South Inc.), Liquid Transporters Inc. (now known as Trimac Transportation East Inc.), Robertson Tank Lines (now known as Trimac Transportation Group Inc.), Ryder Bulk Transportation Services (now known as Triplus Inc.), and Trimac Bulk Transportation, Inc. (now known as Triplus Inc.) - Union Carbide Corporation - Union Pacific Railroad Co.
<p>Dawn Monsen, Esq. K&L Gates LLP One Newark Center, 10th Floor Newark, NJ 07102 Phone: Email:</p>	<p>Alcoa Inc.</p>
<p>Paul F. Strategy Manager - Remediation Management BP America 201 Helios Way, HPL 6th Floor Houston, TX 77079 Phone: Email:</p>	<p>Atlantic Richfield Company, BP America Production Company, BP Amoco Chemical Company, BP Products North America Inc., and Welchem, Inc.</p>
<p>CT Cor 350 North St. Paul Street, Suite 2900 Dallas, TX 75201 Phone: 214-932-3601</p>	<p>Baker Hughes Inc., Baker Petrolite Corporation, and Baker Hughes Oilfield Operations, Inc.</p>

<p>Nan Bernardo Senior Counsel, BASF Corporation 100 Park Avenue Florham Park, NJ 07932 Phone Email:</p>	<p>BASF Corporation</p>
<p>Dwigh Counsel to Champion Technologies, Inc. and Assistant Secretary 3200 Southwest Freeway, Suite 2700 Houston, TX 77027 Phone Email:</p>	<p>Champion Technologies, Inc. (f/k/a Champion Chemicals, Inc.)</p>
<p>Frank Assistant Secretary 6001 Bollinger Canyon Road San Ramon, CA 94583</p>	<p>Chevron U.S.A. Inc.</p>
<p>Ken Carpenter Chief Financial Officer 10601 Bay Area Blvd Pasadena, TX 77507 Phone: Email:</p>	<p>Dixie Chemical Company, Inc.</p>
<p>Corpor 211 East 7th Street, Suite 620 Austin, TX 78701-3218 Phone: (866) 403-5272</p>	<p>Exxon Mobil Corporation, Mobil Oil Exploration & Producing Southeast Inc., Mobil Exploration and Producing North America Inc., Mobil Producing Texas & New Mexico Inc., Mobil Research and Development Corporation, Mobil Business Resources Corporation, The Superior Oil Company, Mobil Oil Corporation (now known as ExxonMobil Oil Corporation), Mobil Exploration and Producing Services Inc., Mobil Corporation, Exxon Technology Holding Corp., Reliance Electric Company, Exxon Biomedical Sciences, Inc. (now known as ExxonMobil Biomedical Sciences, Inc.), Exxon Research and Engineering Company (now known as ExxonMobil Research and Engineering Company), Exxon Pipeline Company (now known as ExxonMobil Pipeline Company), Exxon Coal USA, Inc. (now known as ExxonMobil Coal USA Inc.), Exxon Production Research Company (now known as ExxonMobil Upstream Research Company), Exxon Chemical Services Americas Inc. (now known as ExxonMobil Chemical Services Americas Inc.), and Friendswood Development Company (now known as Exxon Land Development, Inc.)</p>

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David Fontenet President 8450 Mosley Road Houston, TX 77075 Phone: (713) 941-6421	Mission Petroleum Carriers, Inc.
Hasana Sisco . Vice President, Global Safety Health & Environment 1601 West Diehl Road Naperville, IL 60563-1198 Phone: 630-305-1000	Nalco Company
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Scott E Business, Government & Legal Affairs Manager 2800 Solway Road Knoxville, TN 37931 Phone: Email:	Perma-Fix Environmental Services, Inc.

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<p>CT Corporation System 350 North St. Paul Street Suite 2900 Dallas, TX 75201-4234 Phone:214-979-1172</p>	<p>The Dow Chemical Company</p>
<p>Steven C. Bordenkircher Senior Legal Counsel The Goodyear Tire & Rubber Company 1144 East Market Street, Akron, Ohio 44316 Phone Email:</p>	<p>The Goodyear Tire & Rubber Company</p>

<p>Craig A. Bourgeois Vice-President Trimac Transportation South Inc. 15333 JFK Blvd, Suite 800 Houston, TX 77032 Phone: Email:</p>	<p>Trimac Transportation, Inc., Ameri-Liquid Transport, Inc., DSI Transports, Inc. (now known as Trimac Transportation South Inc.), Liquid Transporters Inc. (now known as Trimac Transportation East Inc.), Robertson Tank Lines (now known as Trimac Transportation Group Inc.), Ryder Bulk Transportation Services (now known as Triplus Inc.), and Trimac Bulk Transportation, Inc. (now known as Triplus Inc.)</p>
<p>CT Corporation System 350 North St. Paul Street, Suite 2900 Dallas, TX 75201-4234 Phone: 214-979-1172</p>	<p>Union Carbide Corporation</p>
<p>Leland F. Willis Regional Environmental Counsel 1001 McKinney Street, Suite 900 Houston, TX 77002-6485</p>	<p>Union Pacific Railroad Co.</p>
<p>CD Appendix F Parties – Major Cashout Settling Def's.</p>	
<p>F.J. Fisher Legal Counsel 1735 Market Street Philadelphia, PA 19103 Phone: 215-841-3101 Email:</p>	<p>Braskem America, Inc., f/k/a Braskem PP Americas Inc., f/k/a Sunoco Chemicals, Inc., f/k/a Aristech Chemical Corporation</p>
<p>Grego Senior Vice President, General Counsel and Corporate Secretary General Dynamics Corporation 2941 Fairview Park Drive, Suite 100 Falls Church, VA 22042-4513 Phone: (703) 876-3719 Email:</p>	<p>General Dynamics Corporation</p>
<p>Matthew Cairone Counsel The Cairone Law Firm PLLC PMB# 6000 4017 Washington Rd McMurray PA 15317-2520 Phone: (412) 606-5751 Email:</p>	<p>Mitsubishi Corporation, to the extent liable at the Site for the liability of Aristech Chemical Corporation or the former USS Chemicals Division of United States Steel Corporation</p>
<p>Kevin Chief Counsel Sunoco, Inc. 1735 Market Street, Suite LL Philadelphia, PA 19103 Phone Email:</p>	<p>Sunoco, Inc., to the extent liable at the Site for the liability of Aristech Chemical Corporation or the former USS Chemicals Division of United States Steel Corporation, or for the liability of Mitsubishi Corporation for liability of Aristech Chemical Corporation or the former USS Chemicals Division of United States Steel Corporation</p>

Andrew G. Thiros Attorney - Environmental 600 Grant Street, Room 1500 Pittsburgh, PA 15219 Phone: Email:	United States Steel Corporation, Tenn-USS Chemicals Co., USS Chemicals 30463, and USS Chemicals Novamont Division
	CD Appendix G Parties – De Minimis Cashout Settling Defendants
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Debra J Senior Regulatory Counsel 120 White Plains Road, Suite 300 Tarrytown, NY 10591-5522 Phone: Email:	Akzo Nobel Chemicals Inc. (f/k/a Akzo Chemicals Inc.), as successor to Texas Alkyls, Inc.
Debra J Senior Regulatory Counsel 120 White Plains Road, Suite 300 Tarrytown, NY 10591-5522 Phone: Email:	Akzo Nobel Paints LLC (f/k/a The Glidden Company), as successor to The Grow Group Inc., Devoe & Reynolds Co. Inc., and Napko Corp.
CT Cor 350 North St. Paul Street, Suite 2900 Dallas, TX 75201 Phone: 214-979-1172	Ametek, Inc.
CSC 211 East 7th St., Ste.620 Austin, TX Phone: 800-927-9800 Fax: 512-397-1564	Aviall Services, Inc. and Aviall, Inc.
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