

REC'D

ST JUN 26 PM 2:45

U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

FILED

ST JUN 18 AM 9:47

U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
YOUNGSTOWN

EMJ: 7/18/91 - ad.
Lyle/Mar in procedure
Noted on signature, RDO

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Case No. **1:97 CV 1715**

STATE OF OHIO, ex rel.
BETTY D. MONTGOMERY
Attorney General of Ohio

Judge

JUDGE WELLS

ECONOMICS

Plaintiff,

v.

ASHLAND OIL INC., et al.

Defendants.

CONSENT DECREE

WHEREAS, the United States Environmental Protection Agency ("U.S. EPA"), pursuant to Section 105 of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. § 9605, placed the Laskin/Poplar Oil Site located in Ashtabula County, Ohio (the "Site" as specifically defined in Paragraph 3.G. of this Consent Decree) on the National Priorities List, which is set forth at 40 C.F.R. Part 300, Appendix B, by publication in the Federal Register on September 8, 1983, 48 Fed. Reg. 40658;

WHEREAS, U.S. EPA and the Laskin Site Group entered an agreement with the Laskin Site Group for a Remedial Investigation and Feasibility Study to assess releases of hazardous

H.

substances from the Site and to evaluate remedial actions to address those releases. The Remedial Investigation was completed on December 23, 1988, and the Feasibility Study was completed on April 7, 1989;

WHEREAS, U.S. EPA reached a decision on the final remedy for the Site which is embodied in the Record of Decision dated June 29, 1989;

WHEREAS, a number of Defendants agreed to finance and implement the Remedy, and Operation and Maintenance activities at the Site by entering into settlement with the U.S. EPA in United States v. Alvin Laskin, et al., Case No 4:90 CV0483 (N.D. Ohio);

WHEREAS, the State of Ohio has incurred costs in addressing releases of hazardous substances from the Site;

WHEREAS, Defendants have consented to the entry of this Consent Decree without acknowledging liability of any type and the entry of this Decree shall not represent an admission or adjudication of liability;

WHEREAS, the parties agree, and the Court has found, that entry of this Consent Decree is in the public interest and will avoid prolonged and complicated litigation between the Parties;

NOW, THEREFORE, it is hereby **ORDERED, ADJUDGED** and **DECREED**:

JURISDICTION

1. This Court has jurisdiction over the subject matter herein, and over the parties consenting hereto. The Defendants shall not challenge this Court's jurisdiction to enter and enforce this Consent Decree. The Defendants waive service of summons in this action. Venue is proper in this Court.

PARTIES BOUND

2. This Consent Decree applies to and is binding upon the undersigned parties and their successors and assigns. The undersigned representative of each party to this Consent Decree certifies that he/she is fully authorized by the party or parties whom he/she represents to enter into the terms and conditions of the Consent Decree and to execute and legally bind that party to it.

DEFINITIONS

3. Whenever the following terms are used in this Consent Decree, the following definitions shall apply:

- A. "Consent Decree" means this Decree.
- B. "Defendants" means those parties, other than the State, who sign this Consent Decree.
- C. "Federal Decree" means the decree currently lodged with the Court in United States v. Alvin Laskin, et al., Case No. 4:90 CV0483 (N.D. Ohio) and any prior and subsequent settlements with U.S. EPA pursuant to which any of the Defendants have agreed/agree to perform remedial action, and operation and maintenance at the Site.
- D. "Hazardous substance" shall have the meaning provided in Section 101(14) of CERCLA, 42 U.S.C. §9601(14).
- E. "National Contingency Plan" shall be used as that term is used in Section 105 of CERCLA, 42 U.S.C. §9605.
- F. "OEPA" means the Ohio Environmental Protection Agency, and its successors and assigns.
- G. "Site" means the Laskin/Poplar Oil Company NPL Site, located in Ashtabula County, Ohio, at 717 North Poplar Street, Jefferson, Ashtabula County, Ohio 44047. This area is a "facility" within the meaning of Section 101(9) of CERCLA, 42 U.S.C. §9601(9).

- H. "Site Coordinator" means the person designated by Ohio EPA to review and comment on the performance of the Work.
- I. "Response Costs" means all direct and indirect costs incurred by the State of Ohio related to the response and remedial actions conducted at the Laskin/Poplar Site by the settling Defendants, other PRPs, U.S. EPA, and Ohio EPA, including, but not limited to, payroll costs, contractor costs, travel costs, oversight costs, laboratory costs, costs of reviewing or developing plans, report or other items, and costs of the Ohio Attorney General's Office in representing Ohio EPA in this action.
- J. "State" means the State of Ohio.
- K. "U.S. EPA" means the United States Environmental Protection Agency.
- L. "Work" means the activities performed including but not limited to reports, plans, schedules, data, and other documents submitted to U.S. EPA and design, construction, and implementation of the tasks described in the Record of Decision for the Site.

REIMBURSEMENT

4. Not later than thirty (30) calendar days after entry of this Consent Decree, each Defendant shall pay to the State the amount designated for such Defendant in Appendix 1. Such payment is in settlement of all claims the State has against each Defendant for Response Costs incurred by the State prior to the entry of this Consent Decree.

5. Payments made pursuant to Paragraph 4 above shall be made in the form of a certified or cashier's check payable to "Treasurer, State of Ohio" and shall be sent to Edith Long, Fiscal Officer, or her successor, Ohio EPA, 1800 WaterMark Drive, P. O. Box 1049, Columbus, Ohio 43266-0149 for deposit into the Hazardous Waste Cleanup Fund. A copy of such check shall be sent to Lyndia Jennings, Administrative Secretary, Environmental Enforcement Section, 30 East Broad Street, 25th Floor, Columbus, Ohio 43215-3428.

COVENANT NOT TO SUE

6. In consideration of the payment made by Defendants pursuant to Paragraphs 4 and 5 above, the State covenants not to sue Defendants or their officers, directors, employees, successors or agents for any Response Costs related to the Site which were incurred by the State prior to the entry of this Consent Decree.

7. Except as expressly provided in Paragraph 6, the State reserves all rights it may have to seek any other relief, including but not limited to the following:

- A. sanctions for violation of this Consent Decree;
- B. if the payments required by Paragraphs 4 and 5 are not made, cost recovery for past Response Costs;
- C. reimbursement of any future costs; these future costs may include but are not limited to the State's 10% matching share of the cost for any U.S. EPA remedial action, the State's costs of operation and maintenance, and the costs of any actions taken by the State to address contamination at the Site;
- D. injunctive relief under state or federal law;
- E. civil and criminal sanctions for violations of law;
- F. liability arising from hazardous substances removed from the Site;
- G. natural resource damages;
- H. administrative orders;
- I. judicial relief pursuant to Sections 121(e)(2), 121(f), or 310 of CERCLA, 42 U.S.C. § 9621(e)(2), 9621(f), and 9659, or any other provision of federal or state law in the event the State becomes dissatisfied with the Work; and
- J. intervention into United States v. Alvin Laskin, et al., Case No. 4:90 CV 0483.

Settling Defendants reserve all defenses they may have to any of the State actions described in this Paragraph.

8. Nothing in this Consent Decree shall constitute or be construed as a release or a covenant not to sue regarding any claim or cause of action against any person, firm, trust, joint venture, partnership, corporation or other entity not a signatory to this Consent Decree for any liability it may have arising out of or relating to the Site, including but not limited to liability from any Response Costs not reimbursed by this Consent Decree. The State expressly reserves the right to sue any person other than Defendants, in connection with the Site.

CONTRIBUTION PROTECTION

9. This Consent Decree provides Defendants with contribution protection as provided in Section 113(f) of the Superfund Amendments and Reauthorization Act of 1986, 42 U.S.C. § 9613.

NONADMISSION

10. Nothing in this Consent Decree, including the payment amounts as set forth in Appendix 1, shall constitute an admission by Defendants of fact or liability.

APPENDICES

11. The following appendices are attached to and incorporated into this Consent Decree:

“Appendix 1” is the Payment Amount for Each Defendant.

COSTS

12. Defendants shall pay the costs, if any, of this action.

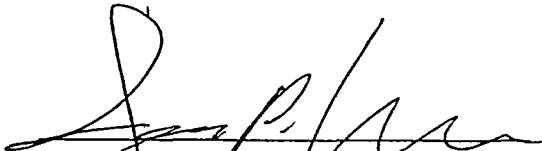
Entered this 18th day of July, 1997.



U.S. DISTRICT JUDGE

The parties whose signatures appear below and on the attached signature pages hereby consent to the terms of this Consent Decree.

BETTY D. MONTGOMERY
ATTORNEY GENERAL OF OHIO



JOSEPH P. KONOELIK (0061692)
TRIAL ATTORNEY
Assistant Attorney General
Environmental Enforcement Section
30 East Broad Street, 25th Floor
Columbus, Ohio 43215-3428
(614) 466-2766

APPENDIX 1

Payment Amount for Each Defendant

Ashland Petroleum Co.	\$17,705.75
Buffalo Molded Plastics, Inc.	\$348.36
Consolidated Rail Corporation	\$2,843.02
Chevron U.S.A. Inc.	\$1,049.77
Amcast Industrial Corporation, fka Dayton Malleable, Inc.	\$88.84
Kmart Corporation	\$383.14
Locke Machine Company	\$400.00
Mercer Forge Corporation	\$3,448.56
Midwest Rubber Reclaiming Company	\$2,134.60
The RCR Group, Inc., fka National Forge Company	\$1,538.40
White Consolidated Industries	\$5,377.43
Slesnick Brothers	\$219.77
Robert K. Elder, Jr., Inc.	\$72.48
Laskin Site Group	\$131,395.47
American Cyanamid Company (Cytex Industries)	
BeazerEast, Inc., fka Koppers Company, Inc.	167,005.39
Beatrice Company	
Browning-Ferris Industries of Ohio, Inc.	
The Cleveland Electric Illuminating Company	
Commercial Intertech Corp.	
Diver-Steel City Auto Crushers, Inc.	
East Ohio Gas, Co.	
General Electric Company	
General Motors Corporation	
Kaiser Aluminum & Chemical Corporation	
Litton Great Lakes Corporation	
North East Service Plaza, Inc.	
Perry Shipbuilding Corporation	
PPG Industries, Inc.	
Rockwell International Corporation	
Tennessee Gas Pipeline Company	
Trans Plastics, Inc.	
TRW Inc.	
Union Carbide Corporation	
USS Great Lakes Fleet, Inc. and The Pittsburgh & Conneaut Dock Company	
General Refractories Company	
R.W. Sidley, Inc.	
Matlack, Inc.	
PC Holdings, fka Perfection Corp.	

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Ashland, Inc.

Name of Defendant

2000 Ashland Drive, Russell, KY 41169

Address

By: 

Signature of Representative

Executive Vice President

D. DUANE GILLIAM

Name of Representative (Print or Type)

Executive Vice President

Title Ashland Petroleum Co., Division of Ashland, Inc.

June 12, 1997

Date

JUN-24-97 TUE 12:44

P.03/03

JUN. 23. 1997N 3:52PMPM ELDERKIN LAW FIRM
JUN 23. 1997 3:00PM ELDERKIN LAW FIRM

FAX NO. 8144565108 NO. 6186 P. 2/232
NO. 6177 P. 2/2

The undersigned defendant hereby consents to the
foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc.
et al.

BUFFALO MOLDED PLASTICS, INC.
Maple Street Extension
P. O. Box 459
Andover, OH 44003

By John Marcolino
John Marcolino
Vice Chairman

June 23, 1997

JUN-18-97 10:34 FROM: 111 GENERAL: 113
10:04:04 1020
PAGE 1071

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Chevron U.S.A. Inc.

Name of Defendant

P.O. Box 1627, Richmond, CA 94802

Address

By:



Signature of Representative

David Tagliareni

Name of Representative (Print or Type)

Site Coordinator

Title

6/19/97

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Amcast Industrial Corporation, fka
Dayton Malleable, Inc.

Name of Defendant

7887 Washington Village Drive
Dayton, Ohio 45459

Address

By: 

Signature of Representative

Denis G. Daly

Name of Representative (Print or Type)

Secretary

Title

June 5, 1997

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

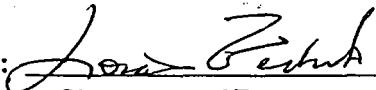
Kmart Corporation

Amount Due: \$383.14

Name of Defendant

3100 West Big Beaver Road
Troy, Michigan 48084-3163

Address

By: 
Signature of Representative

Louis Zednik
Name of Representative (Print or Type)

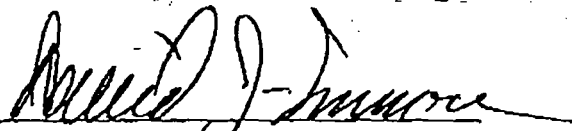
Environmental Law Attorney
Title

6/20/97
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

LOCKE MACHINE CO
Name of Defendant

136 ST. GEORGE RD.
GREENVILLE, PA. 16125
Address

By: 
Signature of Representative

DAVID J. IMMORÉE
Name of Representative (Print or Type)

Former President
Title

6/23/97
Date

JUN-18-97 16:04 FROM: A11. GENERAL/223
10/17/97 10:20
The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

MERCER FORGE CORPORATION

Name of Defendant

200 Brown Street, Mercer, P.A. 16137

Address

By: 

Signature of Representative

James Ackerman

Name of Representative (Print or Type)

Vice President

Title

June 19, 1997

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Midwest Rubber Reclaiming Company

Name of Defendant

c/o Goodrich Management Corp.
560 Sylvan Avenue
Englewood Cliffs, NJ 07632

Address

By: 

Signature of Representative

David R. Rogol

Name of Representative (Print or Type)

Attorney-In-Fact for
Richard M. Cohen

Title

June 23, 1997

Date

JUN 24 5 14 PM '97 JOHN G KOEDEL FRM 004 110 0000
The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v.
Ashland Oil, Inc., et al.

THE RCR GROUP, INC FKA NATIONAL FORGE COMPANY
Name of Defendant

900 MARKET ST., SUITE 200, WILMINGTON, DE 19801
Address

By: John G. Koedel Jr.
Signature of Representative

JOHN G. KOEDEL JR.
Name of Representative (Print or Type)

VICE PRESIDENT
Title

JUNE 25, 1997
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

White Consolidated Industries, Inc.
(RP&C and Copes-Vulcan)

Name of Defendant

11770 Berea Road
Cleveland, Ohio 44111

Address

By: 

Signature of Representative

Douglas E. Mix

Name of Representative (Print or Type)

Vice President - Regulatory Affairs

Title

June 23, 1997

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

SLESNICK BROS.
Name of Defendant

C/O SARAH J. GARNER, ESQ.
KOHRMAN JACKSON & KRANTZ, P.L.L.
707th FLOOR, ONE CLEVELAND CENTER
CLEVELAND, OHIO 44114
Address

By: David J. Slesnick
Signature of Representative

DAVID J SLESNICK
Name of Representative (Print or Type)

RECEIVER FOR SLESNICK BROTHERS
Title

JUNE 25, 1997
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Cytec Industries Inc., on behalf of

AMERICAN CYANAMID CO.

Name of Defendant

5 Carrot Mountain Plaza

Address West Paterson NJ 07940

By: J.P. Cronin KEK
Signature of Representative

J. P. Cronin

Name of Representative (Print or Type)

Executive Vice President

Title

June 25, 1997

Date

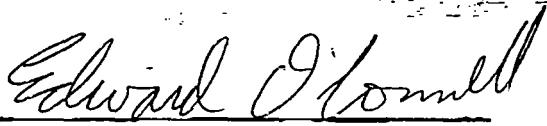
The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Beazer East, Inc.

Name of Defendant

One Oxford Centre
Suite 3000
Pittsburgh, PA 15219

Address

By: 
Signature of Representative

Edward O'Connell

Name of Representative (Print or Type)

Counsel, Law Department

Title

June 20, 1997

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Beatrice Company

Name of Defendant

c/o John W. Carroll
PEPPER, HAMILTON & SCHEETZ LLP
P.O. Box 1181, Harrisburg, PA 17108-1181

Address

By: *D.T. Peters*

Signature of Representative

D.T. PETERS

Name of Representative (Print or Type)

President

Title

June 24, 1997

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Browning-Ferris Industries of Ohio, Inc.
Name of Defendant

1515 Harmon Avenue, Columbus, OH 43223
Address

By: *Gerald K. Burger*, Gerald K. Burger
Signature of Representative

GERALD K. BURGER
Name of Representative (Print or Type)

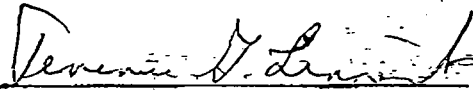
VICE PRESIDENT
Title

JUNE 20, 1997
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

The Cleveland Electric Illuminating Company
Name of Defendant

6200 Oak Tree Blvd.
Independence, OH 44131
Address

By: 
Signature of Representative
Terrence G. Linnert

Terrence G. Linnert
Name of Representative (Print or Type)

Vice President & CFO
Title

June 19, 1997
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Commercial Intertech Corp

Name of Defendant

1775 Logan Avenue Youngstown OH 44505

Address

By: Gilbert Manchester
Signature of Representative

Gilbert Manchester
Name of Representative (Print or Type)

Vice President
Title

6/19/97
Date

JUN-20-97 FRI 15:33

06/20/97 FRI 16:15 FAX 216 694 6883

KAUFMAN & CUMBERLAND

012
012/012

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc. et al.

Divers-Steel City Auto Crushers, Inc.
Name of Defendant

590 Howard Avenue
Youngstown, Ohio 44506
Address

By: [Signature]
Signature of Representative (IRWIN A MARKS)

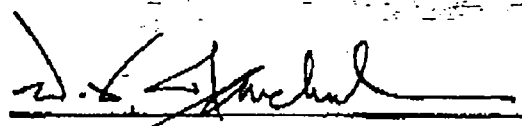
Manager
Name of Representative (Print or Type)
Title

6-20-97
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

EAST OHIO GAS, CO.
Name of Defendant

CLEVELAND, OHIO
Address

By: 
Signature of Representative

WILLIAM A. DANCHUK
Name of Representative (Print or Type)

DIRECTOR - ENV'L AFFAIRS
Title

6/25/97
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

General Electric

Name of Defendant

1975 NOBLE ROAD

CLEVELAND, OHIO 44112

Address

By: R. N. Cotman

Signature of Representative

R. N. COTMAN

Name of Representative (Print or Type)

GEN MGR \$ 7101.00

Title

June 19, 1987

Date

00/10/97 17:31
The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

General Motors Corporation; as a member of the Laskin Site Group

Name of Defendant

c/o Fuller & Henry P.L.L.
One Seagate 17th Floor
Toledo, Ohio 43603

Address

By: 

Signature of Representative

Douglas G. Haynam

Name of Representative (Print or Type)

Counsel

Title

6/25/97

Date

JUN 18 1997 17:31

216 241 6110

P.12

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

KAISER ALUMINUM & CHEMICAL CORPORATION

Name of Defendant

6177 Sunol Boulevard
Pleasanton, California 94566

Address

By: 
Signature of Representative

Charles B. Brown

Name of Representative (Print or Type)

Associate General Counsel

Title

June 20, 1997

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Litton Great Lakes Corp.

Name of Defendant

P. O. Box 6241

Erie, PA 16512

Address

By: 

Signature of Representative

Ralph W. Biggs, Jr.

Name of Representative (Print or Type)

Vice President & General Manager

Title

June 23, 1997

Date

06/25/97 12:05 FAX 814 899 0645

JAB ENTERPRISE

001

JUN-25-97 11:19 AM

216 696 1439

P.14

06/18/97 10:31 216 361 8110

ENAL

012/012

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc. et al.

NORTH EAST SERVICE PLAZA, INC.
Name of Defendant

12214 EAST MAIN RD, NORTH EAST, PA. 16428
Address

By: *Gerald J. Horoych*
Signature of Representative

GERALD J. HOROYCH
Name of Representative (Print or Type)

VICE PRESIDENT
Title

JUNE 25 1997
Date

06/18/97 10:31 0210 241 0210

XML

012/012


The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc. et al.

Perry Shipbuilding Corp.

Name of Defendant

P.O. Box 1318
Erie, PA 16512-1318

Address

By: 
Signature of Representative

Charles R. McCain

Name of Representative (Print or Type)

President

Title

6/25/97

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

PPG Industries, Inc.

Name of Defendant

One PPG Place
Pittsburgh, PA 15272

Address

By: *BJM*
Signature of Representative

Barry J. McGee

Name of Representative (Print or Type)

Vice President, Glass Technology and Manufacturing Services

Title

June 24, 1997

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Rockwell International Corporation

Name of Defendant

Mail Code 292
2135 West Maple Road
Troy, MI 48084

Address

By: David E. Nash

Signature of Representative

David E. Nash

Name of Representative (Print or Type)

Attorney-In-Fact

Title

June 23, 1997

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Tennessee Gas Pipeline Company
Name of Defendant

1001 Louisiana
P. O. Box 2511
Houston, TX 77252-2511
Address

By: *Gregory J. Odegard*
Signature of Representative

Gregory J. Odegard
Name of Representative (Print or Type)

Vice President Environmental Health & Safety
Title

6/20/97
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

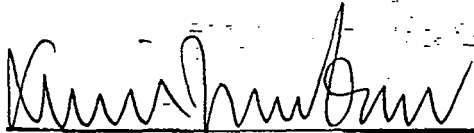
PC HOLDINGS (f.k.a. PERFECTION CORP)

Name of Defendant

2631 LANDER RD.
CLEVELAND OH 44124

Address

By:



Signature of Representative

DAVID S. JACOBSON

Name of Representative (Print or Type)

PRES.

Title

6-20-97

Date

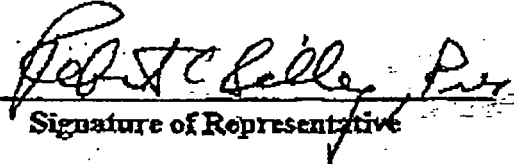
The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc. et al.

R. W. Sidley, Inc.

Name of Defendant

436 Casement Avenue, P.O. Box 150
Painesville, Ohio 44077

Address

By: 
Signature of Representative

Robert C. Sidley

Name of Representative (Print or Type)

President

Title

June 23, 1997

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

General Refractories Company
Name of Defendant

225 City Avenue, Bala Cynwyd, PA 19004
Address

By: 
Signature of Representative

Glenn D. Waggoner
Name of Representative (Print or Type)

Attorney
Title

6/19/97
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

USS GREAT LAKES FLEET, INC. and
THE PITTSBURGH & CONNEAUT
DOCK COMPANY

Name of Defendant

135 JAMISON LANE
P. O. BOX 68
MONROEVILLE, PA 15146

Address

By: 

Signature of Representative

COLETTE FERRIS-SHOTTON

Name of Representative (Print or Type)

SENIOR ATTORNEY and
ASSISTANT SECRETARY

Title

JUNE 23, 1997

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Union Carbide Corporation

Name of Defendant

39 Old Ridgebury Road, Danbury, CT 06817-0001

Address

By: 

Signature of Representative

William E. Coughlin

Name of Representative (Print or Type)

Attorney

Title

6/20/87
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

TRW Inc.

Name of Defendant

1900 Richmond Road
Cleveland, OH 44124

Address

By: David B. Goldston
Signature of Representative

David B. Goldston

Name of Representative (Print or Type)

Assistant Secretary

Title

June 19, 1997

Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Trans Plastics, Inc.
Name of Defendant

Address

By: *Doratha Christoph*
Signature of Representative

DORETHA CHRISTOPH
Name of Representative (Print or Type)

SECRETARY
Title

6-20-97
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Consolidated Rail Corporation
Name of Defendant

Two Commerce Square
2001 Market Street
Philadelphia, PA 19101-1416
Address

By: *Ch. R. McElwee, II*
Signature of Representative

Charles R. McElwee, II
Name of Representative (Print or Type)

Attorney
Title

6/26/97
Date

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc. et al.

Matlack, Inc.

Name of Defendant

RLC Corporation
One Rollins Plaza
Wilmington, DE 19899

Address

By: Charles R. McElwee, II

Signature of Representative

Charles R. McElwee, II

Name of Representative (Print or Type)

Attorney

Title

6/26/97

Date

FROM : GERR HERMAN

The undersigned Defendant hereby consents to the foregoing Consent Decree in State of Ohio v. Ashland Oil, Inc., et al.

Robert K. Elder, Jr., Inc.

Name of Defendant

6107 East Calla
North Lima, Ohio 44452

Address

By: Kimberly O Porritt
Signature of Representative

Kimberly O Porritt
Name of Representative (Print or Type)

President
Title

6-24-97
Date