

IN THE COURT OF COMMON PLEAS
CLERMONT COUNTY, OHIO

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STATE OF OHIO,)	CRIMINAL NOS.
)	85-CR-5240(C) thru
)	85-CR-5263(C)
Plaintiff,)	85-CR-5240(D) thru
)	85-CR-5263(D)
)	
v.)	PLEA AGREEMENT
)	
INTERNATIONAL, INC.,)	
et al.,)	
)	
Defendants.)	

COMES NOW the State of Ohio by its attorneys Anthony J. Celebrezze, Jr., the Attorney General of the State of Ohio and his undersigned Assistant, Dennis Muchnicki, and Donald W. White, Prosecutor of Clermont County, and CECOS International, Inc. ("CECOS"), by its attorney John Isadore, and Browning-Ferris Industries, Inc. ("BFI"), by its attorney John Pyle, and agree to resolve the above-entitled matter pursuant to the terms and conditions as more particularly set forth below and in consideration of CECOS' concurrent and integrated settlement of a companion civil case affecting the defendant's facility at 5092 Aber Road, Williamsburg, Ohio (Clermont County) (hereinafter, the "facility").

BACKGROUND

1. The State of Ohio commenced this criminal action by indictment returned May 31, 1985. The resolution of this action is embodied in this Plea Agreement.

2. The State of Ohio, ex rel. Anthony J. Celebrezze, Jr., Attorney General of Ohio, commenced a civil action, case no. 88CV0172, for injunctive relief and civil penalties against Browning-Ferris Industries, Inc., Browning-Ferris Services, Inc., CECOS International, Inc., Mark Monroe, and Jim Salmon. A Consent Decree (hereinafter "Consent Decree") resolving that civil matter and filed with this court this ___ day of _____, 1990, is attached hereto as Exhibit A and is incorporated herein by reference.

3. By entering into this Plea Agreement the parties intend the concurrent resolution of both the criminal and civil actions by payment of appropriate fines and establishment of trust funds reasonably related to the circumstances in issue, with regard to all civil and criminal litigation relating to the facility.

4. By entering into this Plea Agreement, CECOS further intends the resolution of both the criminal and civil actions in a manner which will allow CECOS affirmatively to demonstrate rehabilitation.

5. The penalties paid and the rehabilitative measure taken and required both by this Plea Agreement and pursuant to the Consent Decree have been considered by the parties in reaching this resolution and have affected its terms.

PLEA AGREEMENTS

The parties agree as follows:

6. CECOS will enter a plea of guilty to the following charge: On or about November 1, 1984, at the County of Clermont, Ohio, CECOS did unlawfully and recklessly violate the terms and conditions requiring compliance with performance standards of the hazardous waste facility installation and operation permit issued to CECOS/CER Co. contrary to and in violation of Sections 3734.11, 3734.99 and 2901.23 of the Revised Code of the State of Ohio.

7. CECOS agrees to pay a fine in the amount of \$25,000.

8. The State of Ohio agrees to move, at the time of sentencing, to dismiss all remaining charges against CECOS and all charges against BFI in this action.

REHABILITATION MEASURES

9. Subsequent to January 1, 1988, in order to minimize and prevent the occurrence of violations of the environmental laws of the State of Ohio and to assure that a continuous state of compliance with those laws will be maintained at the facility at all times, including closure and post-closure (as contemplated by the consent decree which requires the facility to cease receiving hazardous waste for disposal), CECOS has taken the following management actions:

a. CECOS hired new corporate management personnel at its headquarters office and at the Aber Road facility who are experienced with environmental protection and related public interest matters and who are strongly

committed to compliance with environmental laws.

Regarding management personnel, CECOS has taken the following actions:

- i. Hired a new CECOS president, Greg Muldoon, in February, 1989. Greg Muldoon joined BFI in 1980 as manager, Landfill Development for the East Central Region. He held various district manager positions in the East Central Region before he was promoted to his current position. Mr. Muldoon is responsible for overseeing the day-to-day operations and performance of CECOS and is currently involved with permitting efforts for secure hazardous waste landfills. Mr. Muldoon obtained a B.A. in History and Journalism from Washington and Lee University. Prior to joining BFI, Mr. Muldoon worked for the National Solid Waste Management Association in Washington, D.C., as Manager, State Affairs. He also worked as the Director, State Government Affairs, for the National Association of Home Builders.
- ii. Hired a new Aber Road Facility Manager, James R. Stout, on January 18, 1989. Mr. Stout has eight years of experience in Environmental and Hazardous Waste Management and received a B.S.

and M.S. in Biology from the University of Cincinnati. As facility manager Mr. Stout is responsible for the oversight of all activities at the facility, including environmental compliance, daily operations, construction, and remedial activities. Prior to his present position, Mr. Stout managed an Environmental Remediation Services District for CECOS. In that position he was responsible for all phases of a full range of environmental services including: site investigation; remediation alternatives recommendation; on-site treatment and other remediation activities; transportation and off-site treatment and disposal; compliance with federal, state, and local regulations; and health and safety management.

- iii. Created the position of Assistant District Manager and filled it with David T. Lawhon, formerly the Senior Hydrogeologist at the CECOS corporate office, on October 2, 1989. As Assistant Manager, Mr. Lawhon is responsible for the management of the facility in Mr. Stout's absence and generally assists in the oversight of the operations of the facility. His discrete duties include overall management of all closure

and partial closure activities at the facility. Mr. Lawhon is a degreed geologist with seven (7) years' experience in the field of hydrogeology and ground water resources.

- iv. Promoted John Hart, II, to the position of Environmental Affairs Manager of the facility on March 19, 1990. Mr. Hart received his B.S. in Chemical Engineering from the University of Louisville. Prior to joining CECOS he was with the US Environmental Protection Agency, Region 4, Atlanta, for 4-1/2 years as an environmental engineer in the Waste Compliance Section of the RCRA Branch, involved in both permitting and enforcement matters.
- v. Hired a new corporate Environmental Affairs Vice President.

- (a) From March, 1988 to November 1989, this position was held by Marcia Williams. She is presently Vice President for Environmental Policy and Planning for Browning-Ferris Services, Inc., a subsidiary of BFI. From July, 1988 until November 1989, Ms. Williams served in a dual capacity as Vice President for Environmental and Regulatory Affairs for

CECOS and as a Divisional Vice President for BFI. Prior to these positions, Ms. Williams worked for eighteen (18) years at the United States Environmental Protection Agency. Her most recent position was the Director of the EPA Office of Solid Waste from August 1985 to February 1988. In that position she headed the USEPA RCRA Solid and Hazardous Waste Program nationally. She was responsible for development of all regulations and for national policy on permits, closures, and corrective action. Prior to the OSW position, she was Deputy Assistant Administrator of the Pesticides and Toxics Program. The OPTS program covers the regulations of PCBs and asbestos. She was awarded numerous distinguished service awards including the President's Award for Meritorious Service and the William A. Jump Award for Outstanding Young Federal Managers. Ms. Williams continues to serve as an in-house consultant on environmental and regulatory affairs to the President of CECOS, Greg Muldoon, on an as-needed basis.

(b) The New Environmental Affairs Vice President is Bruce Gantner. Mr. Gantner received a Bachelor of Mechanical Engineering from the General Motors Institute and a Master of Science in Environmental Engineering in 1975 from the University of North Carolina, Chapel Hill. Before and after graduation, Mr. Gantner held positions principally involving industrial health and safety with the General Motors Corporation, the State of North Carolina Department of Labor, and the Cameron Iron Works, Inc. Upon joining BFI in April 1985, his duties included managing the Corporate Industrial Hygiene Program.

vi. Hired a new corporate Vice President-Market Development, George Kush, in October 1988, who in turn was given the additional responsibilities as Vice President-Treatment Systems. Mr. Kush has a B.S. in Civil Engineering, an M.S. in Radiation Biophysics, and is a candidate in a doctoral physics program. As Vice President-Treatment Systems, Mr. Kush has overall responsibility for the operations, environmental compliance and

marketing strategy for all treatment districts within CECOS. Mr. Kush brings to this position extensive experience in the environmental field. He served as Vice President-Environmental affairs for SCA Chemical Services and was involved in the successful acquisition for the first commercial hazardous waste and PCB incinerator after the effective date of RCRA. Mr. Kush was also one of the founders of the Hazardous Waste Treatment Council and was a founding director of the Chemical Waste Institute. He also has extensive experience with the U.S. Air Force where he served as a technical adviser on such issues as electromagnetic radiation and radiation physics.

b. CECOS expanded the company's environmental staff both in absolute numbers of personnel and in technical competence and commitment to environmental compliance. This expansion was accomplished primarily at the direction of Mr. Muldoon.

i. The CECOS Aber Road facility staff has been supplemented with the following persons having substantial relevant work experience and education:

- (a) Waste Acceptance Manager. Ronald E. Louderback is the Waste Acceptance Manager responsible for all waste materials generated and handled at the facility; he has completed courses in geology at Northern Kentucky University. Assuming his position as Waste Acceptance Manager, Mr. Louderback was the Quality Control supervisor for the Aber Road facility. In his new position Mr. Louderback is managing the Quality Control Department.
- (b) Health & Safety Manager. Mark Magee is the new Health and Safety Manager with three years' experience in the areas of safety management and occupational safety and health. He received his B.S. in Industrial and Technical Education, Safety Management and Industrial Health Options, from Louisiana State University. As Health and Safety Manager Mr. Magee is responsible for all safety training, site safety policy review and implementation, preparation and updating of SPCC, Contingency, and Off-site Notification Plans. Prior to joining CECOS in June 1989, Mr. Magee was responsible for

Health and Safety Management for a large environmental engineering services firm.

(c) Environmental Monitoring Manager. Bruce Zuccaro is the Environmental Monitoring Manager responsible for all on-site monitoring. He has over nine (9) years' experience as a geologist and holds a B.S. degree in Geology from Boston University and an M.S. as a Geochemist from the Colorado School of Mines. Before coming to CECOS in June, 1989, Mr. Zuccaro was responsible for preparing Waste Management Programs and Hazardous Waste Permit Applications for several large industrial corporations.

(d) Technical Administrative Assistant. Melodie Heath is the Technical Administrative Assistant responsible for maintaining the computerized permit requirement tracking system and the record keeping system.

(e) Operations Manager. Kevin R. Iler is the new Operations Manager with five years experience in environmental management work. Mr. Iler is responsible for daily

operation of the facility, site maintenance, waste management, and remedial activities. Prior to his current position, Mr. Iler was Proposal Manager and Project Supervisor for a CECOS Environmental Services District where he was responsible for development and management of engineering solutions to treat and remediate hazardous waste problems. Mr. Iler has a B.S. in Zoology from Miami University. Mr. Iler fills the position formerly occupied by John Stirnkorb, who is no longer employed by CECOS.

(f) Water Control Manager. Ernie Kritzmacher fills the position of Water Control Manager created May, 1989 and is responsible for all aspects of water handling, movement, storage and disposal. Mr. Kritzmacher holds an M.S. degree in Organic Chemistry, and has held a number of positions in CECOS, including Health and Safety management and SCMF Supervisory.

ii. The CECOS Spring Grove, Ohio facility has been supplemented with the following persons having substantial relevant work-experience and education:

(a) Facility Manager. Mr. Tim Henry was hired as new Spring Grove Facility Manager in 1989. Mr. Henry has nine (9) years of experience in the field of hazardous waste management and received his B.A. in Microbiology from Miami University in 1977. As facility manager Mr. Henry is responsible for the oversight of all activities at the facility, including environmental compliance, daily operations and closure. Prior to his present position, Mr. Henry served as manager of Sales, Technical Sales Representative and Customer Service Representative for the Spring Grove facility. In these positions he was responsible for coordinating and directing the sales of hazardous waste treatment, storage and disposal services; maintaining sales department awareness of regulatory rules and facility permit conditions; providing customers with appropriate information in complying with federal, state and local hazardous waste regulations; and providing the company with new market opportunities in the treatment and disposal of hazardous wastes.

(b) Assistant District Manager. Mr. Mike Crisenbery was hired as new Spring Grove Assistant Facility Manager in January 1990. Mr. Crisenbery has a B.S. degree in Chemistry/Microbiology and is working on a Masters in Business Administration. He has over four (4) years experience in the field of hazardous waste management. Prior to his present position, Mr. Crisenbery managed the environmental services district for CECOS in Ohio. In that position he was responsible for all phases of a full range of environmental services including: site investigation; evaluating alternatives for treatment and disposal; on-site treatment and remediation activities; transportation and off-site treatment and disposal; compliance with federal, state and local regulations; and health and safety management.

(c) Environmental Manager. Mr. Eric Anderson is the Environmental Manager with the specific responsibility for managing the environmental affairs program at the Spring Grove facility. Mr. Anderson has six (6)

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years of direct environmental experience and received his B.S. degree in Chemistry from Miami University in 1982. Prior to his current position, Mr. Anderson was a Waste Acceptance Manager at the Spring Grove facility, a project manager in the Lab Pak program, a Quality Control Supervisor in waste acceptance, a Field Supervisor in groundwater monitoring, and a Quality Control Technician in waste acceptance review. Mr. Anderson is a Certified Hazardous Materials Manager by the Institute of Hazardous Materials Management.

- (d) Waste Acceptance Manager. Mr. Terry Bliss has over three (3) years of environmental management experience and received his B.S. in Geology from the University of Cincinnati in 1986. Prior to his current position, Mr. Bliss worked at CECOS as a Customer Service Representative, Project Foreman in the Lab Pak program, and as a proposal manager for the Ohio Environmental Services District of CECOS. In his current position he has direct responsibility for

seeing that incoming wastes are approved for management at the Spring Grove facility and that these approved wastes are properly treated and disposed in accordance with state and federal regulations.

- (e) Health and Safety Manager. Mr. Art Farmer is the Health and Safety Manager for the Spring Grove facility and received his B.S. in Environmental Management from South Dakota University. In his position Mr. Farmer has direct responsibility for all safety training, site safety policy development, and implementation, accident prevention and loss control, preparation and updating of emergency response and contingency procedures, and off-site notification plans. Prior to joining CECOS in October 1988, Mr. Farmer was responsible for health and safety for a large contractor managing a DOE facility in Ohio. Mr. Farmer is a Certified Hazardous Materials Manager by the Institute of Hazardous Materials Management.
- (f) Laboratory Manager. Ms. Renee Gray is the Laboratory Manager for the Spring Grove

facility and received her B.S. in Chemistry in 1980 from Wright State University. Ms. Gray has over ten (10) years of laboratory experience with particular qualifications in methods development and waste analysis. As Laboratory Manager, Ms. Gray has specific responsibility for preacceptance testing and approval of all potential customer wastes and for on-site testing and approval of incoming wastes to the facility.

(g) Permits Manager. Mr. Jack Snowden is the Permits Manager for the Spring Grove facility and received his B.S. degree in Chemistry from University of Cincinnati. In his position Mr. Snowden has specific responsibility for developing and submitting all regulatory permits for the Spring Grove facility and in maintaining facility compliance with permit requirements. Prior to his current position, Mr. Snowden held previous positions at CECOS as Technical Manager for the Spring Grove facility, and Health and Safety Manager for both the Aber Road and Spring Grove facilities. Mr. Snowden is a

Certified Hazardous Materials Manager by the Institute of Hazardous Materials Management.

(h) Operations Manager. Mr. Jeff Rowe is the Operations Manager with over eight (8) years of hazardous waste management experience. He received a B.A. in Zoology from Miami University in 1977, and in his current position he has primary responsibility for daily operation of the facility, as well as site maintenance. Included within this responsibility is being knowledgeable of applicable environmental, health and safety regulations so as to maintain all operations in full compliance with these rules. Mr. Rowe has prior experience with CECOS in waste processing and treatment.

c. The CECOS corporate environmental affairs staff, which provides technical support and training for the Aber Road staff and which participates in environmental audits and oversight of the Aber Road facility operation, has been staffed with the following persons having the indicated responsibilities, work experience and education:

- i. Environmental Compliance Manager. Mr. John R. Hayworth is a masters degreed biologist and joined the staff on December 4, 1988. Prior to joining CECOS, during his ten-year tenure with the Indiana Department of Environmental Management, he was Section Chief for Hazardous Waste Enforcement, Branch Chief for State Solid and Hazardous Waste Management Planning, and Chief of Environmental Emergency Response.
- ii. Senior Environmental Compliance Analyst. Mr. Vic Saufley is a degreed biologist and joined the CECOS staff in October, 1988. Formerly he was with BFI's Environmental Compliance Group and BFI Regional Laboratory. Mr. Saufley has been responsible for waste acceptance approvals, RCRA and solid waste regulatory compliance, auditing of individual company sites, as well as subcontractors and for plan development.
- iii. Environmental Compliance Analyst. Mr. Carl Staszak is a degreed chemical engineer and joined the staff in January 1984, as a research engineer. Mr. Staszak provides management of engineering projects and review of emerging technologies. Mr. Staszak has written several publications on hazardous waste treatment

technologies and has been involved in the development of a full-scale sequencing batch reactor for wastewater treatment.

- iv. Compliance Analyst. Rhonda Redd is a degreed chemist and marine biologist. She first joined CECOS in February 1989 as an environmental auditor after serving eight (8) years with BFI's regional laboratory.
- v. Environmental Audits Manager. Mr. David Sullivan is a masters degreed environmental scientist with a toxicology and engineering background and joined the staff in January 1989. Mr. Sullivan was previously employed by the United States Environmental Protection Agency, Region VI, where he held several different positions in the field of Clean Water Act project engineering, and environmental emergency response. He spent five (5) years in the EPA Houston office as a Field Investigator doing multimedia compliance investigations at regulated facilities. He most recently was the Chief of the Air Enforcement Section responsible for the Clean Air Act enforcement in Arkansas, Louisiana and Oklahoma. Mr. Sullivan has direct compliance experience in monitoring and

enforcing EPA's regulations in Clean Air, Clean Water, RCRA, TSCA, CERCLA, SPCC and Marine Research and Protection Act. His previous positions involved construction project screening for compliance with all local, state, and federal laws and regulations under the National Environmental Policy Act regulations. Mr. Sullivan has initiated and led teams of EPA investigators that successfully investigated and prosecuted civil and criminal violations of most federal environmental laws. He was recently awarded a bronze medal by EPA for his part in successful criminal prosecution of a multimedia environmental case in the Houston Ship Canal area, a case pursued jointly by EPA, Region VI, NEIC, DOJ and the Houston Office of the U.S. Attorney.

- vi. Senior Environmental Auditor. Ms. Sandra Nichols is a master degreed geologist and joined the staff in 1989. She is responsible for the supervision of field operations involving the environmental, health, and safety audits of BFI's hazardous waste TSD facilities. Ms. Nichols was previously employed as a field investigator for the Texas Water Commission

involving underground storage tank enforcement and remediation.

vii. Senior Environmental Auditor. Bard Viner is a degreed environmental engineer who has recently accepted a position with CECOS as a Senior Auditor. Mr. Viner has fifteen (15) years' experience in the industry as a plant environmental engineer and with EPA as a multimedia compliance investigator. Mr. Viner was previously employed in EPA's Houston office as Lead Investigator and Investigator Training Coordinator for RCRA investigations.

viii. Environmental Auditor. Steve Shiner holds a B.S. in Environmental Science and has twelve (12) years of experience in providing advice and assistance regarding hazardous waste and water-related compliance issues.

ix. Environmental Auditor. Ms. Laurene Krieger is a degreed chemist and joined the staff in November 1988. Prior to joining the audit group, Ms. Krieger was involved in marketing and market development.

x. Manager of Permits. Ms. Gerri Lawrence is a licensed environmental attorney, as well as a masters degreed biologist. She has had varied

experience from medical research to a general civil practice specializing in litigation support in the areas of industrial, chemical and toxicological liability. Her most recent position prior to joining the staff in July 1989 was with a private consulting firm where she specialized in comprehensive regulatory monitoring and permit development and implementation.

- x. Senior Permits Analyst. Ms. Lillian DePrimo holds a B.S. in Biology and has been with BFI since 1978. Her prior responsibilities have included chemistry laboratory analysis and RCRA TSD compliance and remediation activities. Ms. DePrimo presently oversees the preparation of RCRA permit applications and discussions with the regulatory agencies.
- xii. Permit Analyst. Ms. Dina Stephenson is a degreed chemical engineer and joined the staff in February 1989. During the nine (9) years prior to joining the permit staff, Ms. Stephenson held several environmental positions with various industries, consulting firms and the Texas Department of Health with responsibility for permit application

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development and review, auditing of commercial hazardous waste facilities, and most recently was Environmental Manager for a Texas hazardous waste recycling firm.

xiii. Permits Analyst. Ms. Dana Bain holds a B.S. in Biology and has over ten (10) years' experience in inventory control, facilities management, and data entry. Ms. Bain is responsible for data entry and coordination of permit applications and modifications.

xiv. Manager, Environmental Remediation. Mr. Patrick S. Steerman is a degreed geologist with ten (10) years' experience in the areas of engineering geology, hydrogeology, and hazardous waste and joined CECOS in October, 1989. As Manager of Environmental Remediation, Mr. Steerman works closely with staff and site personnel to evaluate and assess environmental data and to develop monitoring and investigative plans and design and coordinate remedial activities. The Environmental Remediation group is also responsible for the identification and selection of qualified consultants and/or contractors, and estimation of remedial and closure/post-closure costs.

xv. Hydrogeologist. Ms. Wendy L. D'Attilio is a degreed geologist and joined the staff in April 1989. Ms. D'Attilio has seven (7) years' experience in the field of hydrogeology. She is involved with the evaluation of environmental monitoring data and planning and implementation of site investigations. In addition, Ms. D'Attilio is involved with consultant and subcontractor oversight to insure the quality of services provided during investigative or environmental monitoring activities. Prior to joining CECOS, Ms. D'Attilio was employed by nationally known consulting firms specializing in the field of hydrogeology and hazardous waste management.

d. The individual defendants in this criminal case and the individual defendants in the civil case being settled concurrently with this case are no longer employed by CECOS in any capacity.

10. In order to minimize and prevent the occurrence of violations of the environmental laws of the State of Ohio and to assure that a continuous state of compliance will be maintained at the facility during closure and post-closure, CECOS has instituted and/or has committed to implement the following formal management controls during the closure and post-closure periods at the facility:

a. CECOS instituted new policies and procedures, including a comprehensive environmental compliance audit program, with the intent to assure a high level of continuing environmental compliance at the Ohio CECOS facilities. A summary of the current audit program is attached to this Plea Agreement as Exhibit B.

b. CECOS made significant physical improvements at the Aber Road site, such as, the surface water management system, with the intent to assure that no waste from the site will be placed or discharged into surface waters off site. That system collects all potentially contaminated surface water at the site so that it can be evaluated prior to disposal.

c. CECOS instituted a comprehensive groundwater monitoring plan and, concurrently, more substantial in-depth studies of groundwaters in and around the site, with the intent to assure that contaminants will not migrate from the site in groundwater. CECOS has also instituted a groundwater data management and retrieval system which will enable CECOS to provide statistical analyses of data for purposes of early detection and reporting of anomalous groundwater quality results.

d. CECOS has developed and made operational a computerized regulatory compliance/task management tracking system with the intent to assure that facility managers are regularly on notice of all requirements.

11. In order to minimize and prevent the occurrence of violations of the laws of the State of Ohio and to assure that a continuous state of compliance will be maintained at the facility during closure and post-closure, CECOS has made the following management decisions:

a. CECOS has committed to close the site permanently and undertake closure and post-closure responsibilities.

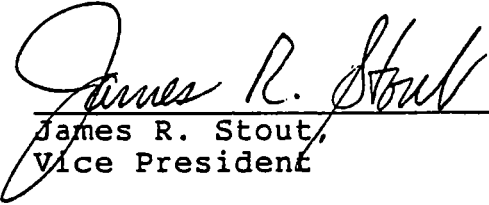
b. CECOS has agreed to make payments to the State and Clermont County, as set forth in the Consent Decree settling civil case No. 88-CV-0172.

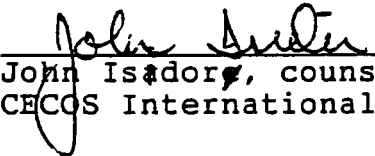
12. The State acknowledges that CECOS has implemented the management changes and formal controls described in paragraphs 9, 10 and 11 to minimize and prevent the occurrence of violations of the environmental laws of the State of Ohio. The State further acknowledges that the actions described in paragraphs 9, 10 and 11 are the kind contemplated by ORC § 3734.44(C) to demonstrate rehabilitation of a business concern that has been convicted of an environmental offense, such as the offense to which CECOS is pleading guilty in this case. Such actions shall be considered by the State of Ohio in making a rehabilitation determination with respect to CECOS.

13. The State agrees that this Plea Agreement and all actions contemplated hereby resolve all criminal charges against CECOS and BFI and its subsidiaries arising out of the series of incidents that are the subject of the indictments returned by the


grand jury in Clermont County, Ohio, on May 3, 1985, against
CECOS and BFI.

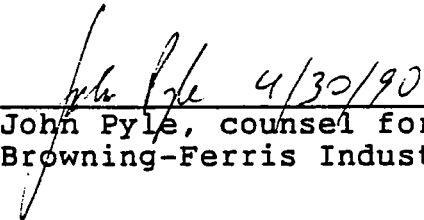
FOR CECOS INTERNATIONAL, INC.


James R. Stout,
Vice President

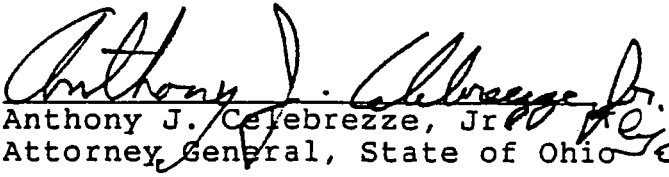

John Isador, counsel for
CECOS International, Inc.

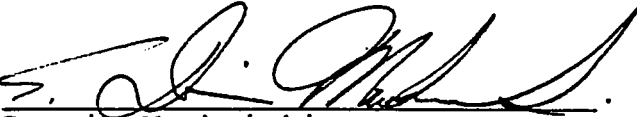
FOR BROWNING-FERRIS INDUSTRIES,
INC.

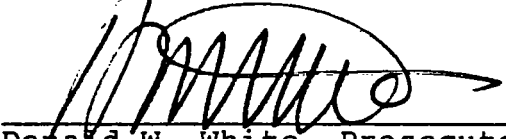

Gerald K. Burger, Secretary


John Pyle, counsel for
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