

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION V

IN THE MATTER OF: )

I. JONES RECYCLING, )  
CLINTON STREET )  
Fort Wayne, Indiana )

US EPA Docket No. V-W- '91 -C- 089

Proceeding Under Section 122 )  
(h) of the Comprehensive )  
Environmental Response, Com- )  
pensation, and Liability Act )  
of 1980, as amended, 42 U.S.C.)  
Section 9622(h) )

ADMINISTRATIVE ORDER  
ON CONSENT --  
COST RECOVERY SETTLEMENT

**I. JURISDICTION**

This Administrative Order on Consent ("Consent Order") is issued pursuant to the authority vested in the President of the United States by Section 122 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1986 ("CERCLA"), Pub. L. No. 99-499, 42 U.S.C. Section 9622, to reach settlements in actions under Sections 106 and 107(a) of CERCLA, 42 U.S.C. Sections 9606 and 9607(a). The authority vested in the President has been delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order 12580, 52 Fed. Reg. 2923 (Jan. 29, 1987) and further delegated to the Regional Administrators of EPA by Delegation No. 14-14-D (Sept. 13, 1987).

This Administrative Order on Consent is issued to each Respondent identified in Appendix 1. Each of these persons has been identified as having contributed hazardous substances to the hazardous waste recycling facility at 3651 North Clinton Street,

Fort Wayne, Indiana. EPA and the Respondents agree that the actions undertaken by the Respondents in accordance with this Consent Order, and the signing of this Consent Order, do not constitute an admission of any liability by any Respondent. The Respondents do not admit, and retain the right to controvert in any subsequent proceedings, other than proceedings to implement or enforce this Consent Order, the validity of the Statements of Fact or Determinations contained in this Consent Order. Respondents agree not to contest the jurisdiction of EPA to issue or enforce this Consent Order in any action taken to enforce this Consent Order. Each Respondent agrees to undertake all actions required by the terms and conditions of this Administrative Order on Consent.

## II. DEFINITIONS

Whenever the following terms are used in this Consent Order or the Appendices attached hereto, the following definitions specified in this Paragraph shall apply:

1. "CERCLA" shall mean the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended by the Superfund Amendments and Reauthorization Act of 1985 ("SARA"), 42 U.S.C. Sections 9601 et seq.
2. "Clinton Street Group" means those parties who timely complied with the EPA's July 27, 1988 order by submitting a workplan and satisfactorily completing the response activities required by that order.

3. "EPA" means the United States Environmental Protection Agency.

4. "Facility" means the "facility" as that term is defined at Section 101(9) of CERCLA, 42 U.S.C. Section 9601(9), where treatment, storage or disposal of hazardous substances was conducted by Hanchar Industrial Waste Management, Inc.; Chem Resource Recovery, Inc; Continental Waste Systems, Inc.; and I. Jones Recycling, located in Fort Wayne, Indiana at 3651 North Clinton Street, and may include areas outside the property boundary which may contain hazardous substances, including contaminated soil, sediments or groundwater emanating from the past operations at the site.

5. "Hazardous substance" shall have the meaning provided in Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14).

6. "Parties" means the United States Environmental Protection Agency and Respondents.

7. "Potentially Responsible Party" or "PRP" shall mean all persons, as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. Section 9601(21), who are potentially liable to the United States or to other parties for payment of response costs or subject to injunctive relief under Sections 104, 106 and/or 107 of CERCLA, 42 U.S.C. Sections 9604, 9606 and 9607.

8. "Respondents" means those parties other than the United States Environmental Protection Agency who sign this Consent Order.

9. "Response Costs" means any past, present and future costs incurred by EPA or by other parties at the Facility pursuant to 42 U.S.C. Sections 9601 et seq.

### III. STATEMENT OF FACTS

1. The I. Jones Recycling Facility is located at 3651 North Clinton Street in Fort Wayne, Indiana, occupying an area of approximately 4.5 acres. The site was operated as a hazardous waste storage and recycling business from approximately 1979 to 1986 by several different owners and operators. The owner/operators accepted hazardous substances from many industrial sources, including Respondents, and over time accumulated on site a substantial volume of partially treated and untreated hazardous substances. Much of the waste was located in tanks and drums, several of which leaked or threatened to leak all or part of their contents into the environment.

2. Hazardous substances within the definition of Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), have been or were threatened to be released into the environment at or from the Facility. The Facility is not, however, presently on the National Priorities List.

3. EPA, pursuant to Section 106 of CERCLA, 42 U.S.C. Section 9606, determined that conditions at the Facility constituted an imminent and substantial danger to public health or welfare, or the environment. EPA therefore issued an order on October 14, 1986 to certain past and present owner/operator PRPs of the Facility. That order required the named PRPs to perform

removal actions to mitigate the threat posed by conditions at the Facility.

4. On November 3, 1986, after the PRPs named in the October 14, 1986 order refused to comply with that order, the EPA Regional Administrator authorized the expenditure of federal funds to initiate a removal action at the Facility pursuant to Sections 104 and 106 of CERCLA, 42 U.S.C. Sections 9604 and 9606. By December 1, 1986 EPA had characterized the contents of the more than 1000 drums on site, overpacked leaking drums, and staged and secured those drums.

5. Although conditions at the facility had been stabilized somewhat, conditions at the Facility still constituted an imminent and substantial danger to public health or welfare, or the environment. EPA therefore issued an order on September 3, 1987, pursuant to Section 106 of CERCLA, 42 U.S.C. Section 9606, to the same PRPs named in the previous order. The September 3, 1987 order required the named PRPs to perform removal actions to mitigate the threat posed by conditions at the Facility.

6. On August 12, 1987, the EPA Regional Administrator authorized the expenditure of federal funds to initiate a removal action at the Facility pursuant to Sections 104 and 106 of CERCLA, 42 U.S.C. Sections 9604 and 9606, in the event the named PRPs refused to comply with the order which was to be issued on September 3, 1987. On October 19, 1987, after the PRPs refused to comply with the September 3, 1987 order, EPA initiated a removal action at the Facility. Pursuant to the Regional

Administrator's authorization, EPA disposed of all liquid waste in drums, all liquid waste that could be drained and pumped from tanks, and all hazardous waste debris contained in rolloff boxes at the Facility. On March 17, 1988, EPA exempted the removal action at the Facility from the statutory limitation on time and money to be expended on a removal action, pursuant to Section 104 of CERCLA, 42 U.S.C. Section 9604. Removal activities pursuant to the Regional Administrator's authorization were completed on November 23, 1988.

7. As removal activities were ongoing, EPA conducted a review and compilation of the extensive site records, including hazardous waste manifests and invoices, which were found in a state of disarray when EPA first began operations at the Facility in 1986. Through its preliminary review of those documents, EPA identified approximately 300 additional PRPs (including all of the Respondents) that had arranged by contract, agreement or otherwise for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, at the Facility, of hazardous substances owned or possessed by them, or accepted such hazardous substances for transport for disposal or treatment at the Facility.

8. Although conditions at the facility had been stabilized considerably by EPA's removal activities, EPA determined that after its authorized removal work was completed, conditions at the Facility would still constitute an imminent and substantial danger to public health or welfare, or the environment. EPA

therefore issued an order on July 27, 1988, pursuant to Section 106 of CERCLA, 42 U.S.C. Section 9606, to all identified generator, transporter, owner and operator PRPs, including Respondents. The July 27, 1988 order required the named PRPs to perform removal actions to complete the abatement of the threat posed by conditions at the Facility.

9. On September 23, 1988, the Clinton Street Group timely complied with the July 27, 1988 order by submitting a workplan to perform all of the removal work required by the July 27, 1988 order. That removal work included removal and appropriate disposal of all tank sludges; decontamination and appropriate disposal of all tanks, pipes and rolloff boxes; removal and appropriate disposal of contaminated soils; decontamination of site buildings, including boilers, and removal of contaminated building debris; sampling and, where appropriate, removal and appropriate disposal of offsite soil and creek sediment contamination; sampling and, where appropriate, removal of contaminated groundwater; flushing and appropriate disposal of material flushed from storm sewer lines; and provision of site security. On November 23, 1988, EPA approved a revised work plan submitted by the Clinton Street Group. The Clinton Street Group began removal activities at the Facility on November 28, 1988 and completed removal activities at the Facility on or about August 2, 1989. In completing these removal activities, the Clinton Street Group incurred more than \$6 million in response costs. U.S. EPA certified that the removal activities performed by the

Clinton Street Group complied with the terms of the July 27, 1988 order and were consistent with the National Contingency Plan.

10. In performing its response actions at the Facility, as of December 31, 1989, EPA has incurred over \$3,171,285 in documented response costs, exclusive of interest. To date, EPA has received reimbursement for \$1,888,326.05 through an earlier settlement with de minimis PRPs, which was finalized on October 25, 1989. The Respondents are liable for the payment of the unreimbursed costs. In addition, EPA may continue to incur response costs at or in connection with the Facility. Respondents are liable for damages for injury to, destruction of, or loss of natural resources caused by hazardous substances released from the Facility pursuant to Section 107(f) of CERCLA, 42 U.S.C. Section 9607(f).

11. Information currently available to EPA indicates that each Respondent listed in Appendix 1 to this Consent Order arranged by contract, agreement or otherwise for disposal or treatment, or arranged with a transporter for transport for disposal or treatment, at the Facility, of hazardous substances owned or possessed by them, or accepted such hazardous substances for transport for disposal or treatment at the Facility.

12. Each Respondent has certified that it has fully disclosed all information known to it concerning the volume and nature of the hazardous substances it contributed to the Facility.



13. In evaluating the settlement embodied in this Consent Order, EPA has considered the potential cost of remediating contamination at or in connection with the Facility. EPA has identified persons other than the Respondents who owned or operated the Facility, or who arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, of a hazardous substance owned or possessed by such person at the Facility, or who accepted a hazardous substance for transport to the Facility. EPA has considered the nature of its case against these other persons, and the contributions of hazardous substances to the facility by these other persons in relation to those of the Respondents, in evaluating the settlement embodied in this Consent Order.

14. Pursuant to Section 122(h)(1) of CERCLA, this settlement requires concurrence of the United States Department of Justice. This concurrence has been obtained, and notice of this settlement will be given to the public and to the State of Indiana.

15. The State of Indiana has been informed of the content of this Consent Order, has been given an opportunity to comment on this Consent Order, and has represented that it does not object to the entry of this Consent Order.

#### IV. STATEMENT OF PURPOSE

In entering into this Consent Order, the mutual objectives of the Parties are:

A. To reach a final settlement between EPA and Respondents which allows the parties to settle their potential liability at the Facility, except as reserved herein; thereby avoiding difficult, prolonged and complicated litigation among EPA and the settling Respondents; and

B. To simplify subsequent negotiations or litigation concerning the I. Jones Recycling Facility by eliminating additional parties from further involvement in the case.

#### V. DETERMINATIONS

Based upon the Findings of Fact set forth above and on the administrative record for this Facility, EPA made the determinations enumerated below.

1. The I. Jones Recycling Facility is a "facility" as that term is defined in Section 101(9) of CERCLA, 42 U.S.C. Section 9601(9).

2. Each Respondent is a "person" as that term is defined in Section 101(21) of CERCLA, 42 U.S.C. Section 9601(21).

3. Each Respondent is a potentially responsible party (PRP) within the meaning of Sections 107(a) of CERCLA, 42 U.S.C. Sections 9607(a).

4. The past, present or future migration of hazardous substances from the Facility constitutes an actual or threatened "release" as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. Section 9601(22).

5. Settlement with the Respondents is practicable and in the public interest.

6. The EPA recognizes that the claims of the State of Indiana for reimbursement of its response costs and for damages to natural resources and under State law, are not claims for contribution within the meaning of Section 107 of CERCLA, 42 U.S.C. Section 9607, and are not affected or compromised by this settlement, to which the State of Indiana is not a party.

#### VI. ORDER

Based upon the Administrative Record for this Facility and the Findings of Fact and Determinations set forth above, and in consideration of the promises and covenants set forth herein, it is hereby AGREED TO AND ORDERED:

##### A. COVENANTS NOT TO SUE

1. In consideration of EPA's covenant not to sue in Section VI, Paragraph A.2. of this Consent Order, the Respondents covenant not to sue or to otherwise assert any claims or causes of action against the United States, any of its agencies or departments, or the Hazardous Substance Superfund relating to response activities at the Facility. This covenant explicitly extends, but is not limited, to any claims that Respondents may have against the United States, any of its agencies or departments pursuant to Sections 106(b), 107 or 113 of CERCLA, 42 U.S.C. Sections 9606(b), 9607, and 9613, and Respondents explicitly waive all such potential claims. Moreover, each Respondent's signature of this Consent Order shall also constitute a covenant not to sue any other PRPs at the facility with whom EPA has settled as of the effective date of this order

for any response costs incurred as of that date. All other non-de minimis PRPs at the facility with whom EPA has settled as of the effective date of this order will have agreed to an identical covenant not to sue other settling PRPs.

2. Subject to the reservations of rights in Section VI, Paragraph D, of this Consent Order, in consideration of the significant response costs incurred by Respondents in complying with EPA's July 27, 1988 order, and the covenant not to sue and the waiver of potential claims provided herein by Respondents, EPA covenants not to sue or to take any other civil judicial or administrative action against any of the Respondents for "Covered Matters." "Covered Matters" shall refer to any and all claims available to EPA under Section 107 of CERCLA, 42 U.S.C. Section 9607, and Section 7003 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6973, with respect to the Respondents' civil liability as generators or self-transporters of hazardous substances for reimbursement of EPA's response costs incurred prior to the effective date of this Consent Order, for relief under the July 27, 1988 order issued to Respondents by EPA, or for damages for natural resources for which the United States serves as trustee. The United States Department of Justice has concurred in this covenant not to sue and agrees to be bound by its terms.

3. "Covered Matters" do not include liability arising from hazardous substances removed from the Facility, criminal

liability or claims based on a failure by a Respondent to timely meet the requirements of this Consent Order.

**B. PAYMENT OF COSTS**

In the event that any Respondent fails to comply with the terms of this Consent Order, including, but not limited to, the Covenant Not to Sue in paragraph V.A.1. of this Consent Order, such Respondent(s) shall be liable for all litigation and other enforcement costs incurred by the United States to enforce this Consent Order or otherwise obtain such payments.

**C. CERTIFICATION OF RESPONDENTS**

Each Respondent certifies that to the best of its knowledge and belief, the information provided by it to the U.S. EPA, and the site records possessed by U.S. EPA, accurately and truthfully reflect Respondent's best information about the ownership, operation, generation, treatment, composition, characteristics, transportation, or disposal of hazardous substances at or in connection with the Facility, and that such information accurately reflects Respondent's best information about the kind and quantity of hazardous substances delivered by it to the Facility or to another for transport to the Facility. Each Respondent further certifies that it has provided to EPA a timely response to EPA's request for information pursuant to Section 104(e) of CERCLA, 42 U.S.C. Section 9604(e). In addition, each Respondent certifies that to the best of its knowledge and belief, the hazardous substances it contributed to the Facility are not greater in volume than the amount shown in

Appendix 1. If any of these certifications are subsequently determined to be false, the Respondent shall forfeit all payments made pursuant to Section VI.A. of this Order. Such forfeiture shall not constitute liquidated damages and shall not in any way foreclose EPA's right to pursue any other causes of action arising from Respondent's false certification.

D. RESERVATION OF RIGHTS

1. Nothing in this Consent Order is intended to be nor shall it be construed as a release or covenant not to sue for any claim or cause of action, administrative or judicial, civil or criminal, past or future, at law or in equity, which the United States, including EPA, may have against any of the Respondents for any matters not expressly included in Covered Matters.

2. Except as otherwise expressly indicated in Paragraph A. of Section VI of this Consent Order, nothing in this Consent Order constitutes a covenant not to sue or to take action or otherwise limits the ability of the United States, including EPA, to seek or obtain further relief from any Respondent hereto, and the covenant not sue in Paragraph A. of Section VI of this Consent Order is null and void with respect to any Respondent, if such Respondent breaches one or more of the express warranties set out in Paragraph C. of Section VI above.

3. Except as otherwise expressly indicated in Paragraph A. of Section VI of this Consent Order, nothing in this Consent Order is intended as a release or covenant not to sue for

any claim or cause of action, administrative or judicial, civil or criminal, past or future, in law or in equity, which the parties, including EPA, may have against any person, firm, corporation or other entity not a signatory to this Consent Order.

4. EPA and the Respondents agree that the actions undertaken by the Respondents in accordance with this Consent Order do not constitute an admission of any liability by any Respondent. The Respondents do not admit, and retain the right to controvert in any subsequent proceedings, other than proceedings to implement or enforce this Consent Order, the validity of the Statements of Fact or Determinations contained in this Consent Order.

**E. CONTRIBUTION PROTECTION**

Subject to the reservations of rights in Section VI, Paragraph D. of this Consent Order, EPA agrees that by entering into and carrying out the terms of this Consent Order, each Respondent shall be entitled to contribution protection to the full extent provided by Sections 113(f)(2) and 122(h)(4) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(h)(4), for matters addressed by this settlement.

**F. PARTIES BOUND**

This Consent Order shall apply to and be binding upon the Respondents and their agents, successors and assigns. Each signatory to this Consent Order represents that he or she is fully authorized to enter into the terms and conditions of this

Consent Order and to bind legally the Respondent represented by him or her.

H. PUBLIC COMMENT

This Consent Order shall be subject to a thirty day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. Section 9622(i). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. Section 9622(i)(3), EPA may withdraw its consent to this Consent Order if comments received disclose facts or considerations which indicate that this Consent Order is inappropriate, improper or inadequate.

I. ATTORNEY GENERAL APPROVAL

The Attorney General or his designee has issued prior written approval of the settlement embodied in this Consent Order in accordance with Section 122(h)(1) of CERCLA, 42 U.S.C. Section 9622(h)(1). A copy of that approval is attached hereto and incorporated herein by reference.

J. EFFECTIVE DATE

The effective date of this Consent Order shall be the date upon which EPA issues written notice to the Respondents that the public comment period pursuant to Section VI, Paragraph H. of this Consent Order has closed and that comments received, if any, do not require modification of or EPA withdrawal from this Consent Order.



I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms.\* The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

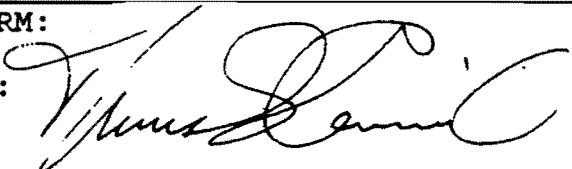
General Electric Co.

3/26/91

FIRM:

Date

BY:



Manager Remediation Programs

Title:

\* U.S. EPA has represented that the information made available by U.S. EPA to General Electric pursuant to General Electric's Freedom of Information Act request is the full extent of "site records possessed by U.S. EPA" referred to in paragraph VI.C of this Order. Additionally, U.S. EPA has advised that Appendix I was not attached to the Order but will be prepared by U.S. EPA after all signature pages are received by U.S. EPA. As such, the volume ascribed to General Electric is 704776 gallons.

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT.

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

Franklin Electric Co., Inc.

3/14/91

FIRM:

Date

X BY:



President & C.E.O.

Title:

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

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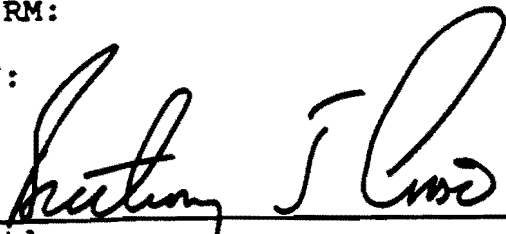
Essex Group, Inc.

March 19, 1991

FIRM:

Date

BY:



Title:

Anthony J. Criso  
Vice President - General Counsel

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

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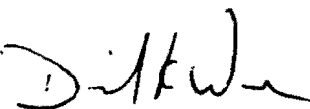
UNITED TECHNOLOGIES AUTOMOTIVE, INC.

April 2, 1991

FIRM:

Date

BY:



David K. Ware

Title: Vice President - Counsel

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned <sup>employee</sup>~~Officer~~ has authority to bind the undersigned Respondent to this Consent Order.

GENERAL MOTORS CORPORATION  
FIRM:

APRIL 17, 1991  
Date

BY:

Don A Schieman  
Title: ATTORNEY

General Motors Corporation ("GMC") makes the certification at paragraph VI.C. of this Order with respect to "the site records possessed by U.S. EPA" only to the extent that such records consist of the response submitted by GMC to U.S. EPA's request for information pursuant to § 104(e) of CERCLA, 42 U.S.C. § 9604(e). In addition, U.S. EPA has advised that Appendix 1 referred to in paragraph VI.C. of this Order was not attached to the Order but will be prepared by U.S. EPA after it has received all signature pages and that the volume attributed to GMC on Appendix 1 will be 167223.

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

Navistar International Transportation Corp. March 26/1991  
FIRM: Date

BY:

*Dean P. Stanley*

Vice President, Quality Management and Technology  
Title:

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

The Boler Company. \*  
FIRM:

March 15, 1991  
Date

BY: John M. Gaynor

  
Title: Treasurer

\*PRP known as: HENDRICKSON TANDEM CORP. (correct  
name: Hendrickson Suspension, a division of  
The Boler Company.)

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

QUEEN CITY BANKER CO. 4-16-91  
FIRM: \_\_\_\_\_ Date  
BY: [Signature]  
PRESIDENT  
Title: \_\_\_\_\_



I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

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Uniroyal Plastics Company, Inc.  
FIRM:

3/21/91  
Date

BY:

Timothy C. Wright  
Title: Manager Environmental Affairs

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

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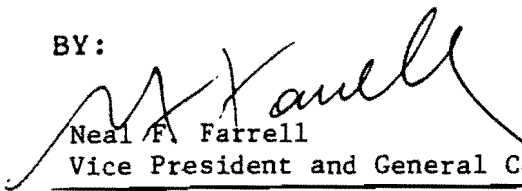
Borg-Warner Corporation

March 14, 1991

FIRM:

Date

BY:

  
Neal F. Farrell  
Vice President and General Counsel

Title:

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

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39

Dana Corporation

March 26, 1991

FIRM:

Date

BY:

*James E. Ayers*

James E. Ayers  
Chief Financial Officer  
Vice President Finance & Treasurer

Title:

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

US EPA Docket No. V-W-'91-C-089  
The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

ASHLAND CHEMICAL, INC.

March 20, 1991

FIRM:

Date

BY:

*SBP-A-11*

*Kmiw*

Group Vice President

Title:

I. JONES RECYCLING, CLINTON STREET  
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COST RECOVERY SETTLEMENT

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FRUEHAUF TRAILER

March 19, 1991

FIRM:

Date

BY: Patrick S. Lancaster

  
Title: Assistant Secretary

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

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MAGNAVOX GOVERNMENT AND INDUSTRIAL  
ELECTRONICS COMPANY

19 March 1991

FIRM:

Date

BY:



Vice President and General Counsel

Title:

I. JONES RECYCLING, CLINTON STREET  
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K. R. Donnelly & Sons Company  
FIRM:

3/15/91  
Date

BY: Wm. C. Hoffman

General Attorney  
Title:

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

Ford Motor Company

FIRM:

BY:

J. M. Rintamaki

Assistant Secretary

Title:

MAR 20 1991

Date



I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

Owens-Illinois General Inc. on behalf  
of itself, its parent corporation  
Owens-Illinois, Inc. and the wholly  
owned subsidiaries of Owens-Illinois, Inc.  
including without limitation  
Owens-Illinois Closure Inc. and  
Owens-Brockway Glass Container Inc.

By

Arthur H. Smith

Arthur H. Smith,  
Assistant Secretary

March 22, 1991

**I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT**

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

JONES CHEMICALS, INC.  
FIRM:

MARCH 15, 1991

Date \_\_\_\_\_

BY: LAURENCE H. SCHONGAR

*James H. Brown*

**Title:** VICE PRESIDENT, OPERATIONS

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.


FEDERAL PAPER BOARD COMPANY, INC.

March 18, 1991

FIRM:

Date

BY:

  
Executive Vice President

Title:

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

TECUMSEH PRODUCTS COMPANY

FIRM:

3/18/91  
Date

BY:

John H. Jones  
Vice President  
Title:

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

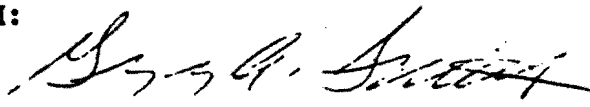
Group Dekko International, Inc.

FIRM:

8 March 91

Date

BY:

  
Gregory A. Smith  
Group Vice President

Title:

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

Zollner Corporation  
2425 Coliseum Boulevard South  
Fort Wayne, IN 46803-2998

March 20, 1991

FIRM:

Date

BY:

Ronald C. Lohman

Title: Controller

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

PALTIER DIV. OF  
FIRM: LYON METAL PRODUCTS, INC.

3/19/91  
Date

BY:

[Signature]

PRESIDENT

Title:

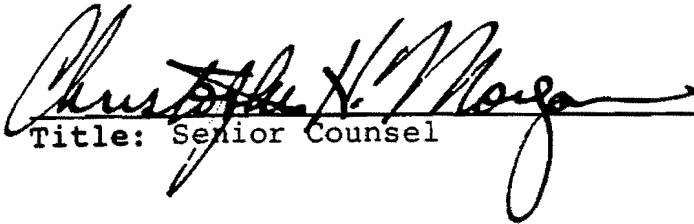
I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

Parker-Hannifin Corporation  
FIRM:

March 15, 1991  
Date

BY: Christopher H. Morgan

  
Title: Senior Counsel



I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

COLWELL/GENERAL, INC.

FIRM:

March 25, 1991

Date

BY: Alex N. Pursley

  
Title: President

I. JONES RECYCLING, CLINTON STREET  
ADMINISTRATIVE ORDER ON CONSENT  
COST RECOVERY SETTLEMENT

The Undersigned Respondent has reviewed and hereby consents to the foregoing Consent Order In the Matter of I. Jones Recycling and agrees to be bound by its terms. The Undersigned Respondent certifies that the undersigned Officer has authority to bind the undersigned Respondent to this Consent Order.

STURGIS IRON & METAL, INC. and  
MICHIANA REFUSE

03-26-91

FIRM:

Date

BY: *Delmer Richmond*

Title: DELMER RICHMOND, SE & TREAS