

RESPONSE TO REQUEST FOR INFORMATION PURSUANT TO
SECTION 104 OF CERCLA FOR ROCKWOOL INDUSTRIES
LOCATED IN PUEBLO, COLORADO

1. The person answering these questions is the respondent, Fred L. Pundsack.
2. Elizabeth A. Mitchell and Paul D. Phillips of Holland & Hart LLP were consulted regarding legal issues.
3. No documents were consulted, examined or referred to in the preparation of answers to any of the questions. No documents are in my possession.
4. The only corporate entity that I know that had an ownership or operational interest in the Site was Rockwool Industries, Inc. I do not know how that ownership or operational interest was acquired. Rockwool Industries, Inc. was a corporation. I do not know any current address of the company. The company was in the business of manufacturing and selling mineral wool insulation.
 - 5a. Rockwool Industries, Inc. was a wholly owned subsidiary of the Susquehanna Corporation. I do not know how Susquehanna acquired ownership of Rockwool. I do not know any other entities that owned capital stock of Rockwool Industries, Inc. I do not know any relationship that Rockwool had with the other entities.
 - 5b. The President of Rockwool Industries, Inc. was a Vice President of the Susquehanna Corp. His name was David Sullivan and I do not know when he began his service. His service ended on or about 1987. Another individual was hired to replace Mr. Sullivan as President of Rockwool. I do not remember that individual's name.
 - 5c. I do not know the amount of capitalization of Rockwool Industries, Inc. or the capitalization of other entities in the same business so I am unable to make any comparisons.
 - 5d. My recollection is that the President of Rockwool Industries, Inc. participated in the pension plan of the Susquehanna Corp., and that his participation was because he was a Vice President of Susquehanna. I do not know of any other Rockwool employees who were eligible to participate.
 - 5e. Rockwool was required to seek the approval of the Susquehanna Corp. for capital expenditures in excess of \$25,000.
 - 5f. Rockwool prepared a yearly business plan that included sales, operating expenses, operating earnings and a capital expenditure budget. This plan was reviewed and approved by the Board of Directors of the Susquehanna Corp. in the normal course of business relations between a parent corporation and a subsidiary.

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5g. I do not recall if the Susquehanna Corp. provided any clerical, administrative, professional or other services or assistance to Rockwool or vice versa.

5h. The President of Rockwool used an office in the Susquehanna Corp. offices. I do not know of any other corporate entities including Susquehanna that loaned, leased or rented furnishings, fixtures, equipment, personal property, real property or space to Rockwool or vice versa.

5i. Other than the normal business relationship between Rockwool as a subsidiary and Susquehanna Corp. as the owner of Rockwool, I do not know of any specific transactions or business relationships with other corporate entities.

5j. I recall that Rockwool had a water contamination issue with the State of Texas at the Rockwool plant in Belton, Texas. This began in the late 1980's. Remediation had not been resolved when I left Susquehanna. I do not know the final resolution of this situation.

The Susquehanna Corp. had a hazardous disposal problem with the EPA at a former fireworks and munitions location in Massachusetts. This also occurred in the late 1980's. I believe that this was resolved by placing the material in drums and disposing of the drums in an accredited hazardous waste disposal site. I do not recall any other pending or previous environmental violations or alleged violations by any other corporate entities.

6a,b, c,d. Since I am no longer employed or affiliated with Susquehanna I do not have any corporate files or any documentation relating to Rockwool. Therefore, I am unable to provide any certified auditor statements or other financial information referred to in these questions.

7. I was a Director of the Susquehanna Corporation from 1984 to 1991. I was Chairman of the Board of the Susquehanna Corporation from 1985 to 1991. I became President and CEO of Susquehanna on or about 1986 or 1987. As CEO I was responsible for the overall business plan and operation of the Susquehanna Corporation. The Presidents of the subsidiaries of the Corporation and the Chief Financial Officer reported to me. The Presidents of the subsidiaries provided me with monthly operating reports of sales, operating expenses, operating earnings and capital expenditures. At the Board of Directors meetings, the Presidents of the subsidiaries reported to the Directors on their operating and financial results.

I reported to the Board of Directors of the Corporation. I did not have an employment contract or agreement. I do not have any position descriptions, correspondence or other documents that describe my former Susquehanna responsibilities, duties and reporting relationships.

- 8a. I had no role. This had been done long before I joined the Susquehanna Corp.
- 8b. I had no role. The manufacturing method had been chosen before I joined Susquehanna.
- 8c. I had no role.
- 8d. I had no role. Manufacturing at the Pueblo site ceased either before or shortly after I joined Susquehanna.
- 8e. I had no role.
- 8f. I had no role.
- 8g. I had no role.
- 8h. I had no role.
- 8i. I had no role.
- 8k. I had no role.
- 8l. The State of Colorado's environmental department notified Rockwool that water coming from the Site was contaminated with arsenic. It appeared that rainwater percolating through the shot piles on the property was contaminated with arsenic leached from the shot. This resulted in action by the State of Colorado and the development of a plan by Rockwool to smooth the shot piles and "cap" them with clay and soil. I participated in one meeting about this matter with the State of Colorado. I believe that this was held with employees of the Health & Environment Dept. I do not have any specific recollections about this meeting. I do recall that the purpose of the meeting was to discuss the remediation plan prepared to smooth and cap the Pueblo site. The plan had not been implemented when I left Susquehanna.
9. The only officers or directors of Rockwool that I recall were Nicholas Dye, David Sullivan and the individual who succeeded Mr. Sullivan as President. I do not recall the name of the individual who succeeded Mr. Sullivan. Mr. Dye preceded Mr. Sullivan as President of Rockwool. I do not know their role in any of the functions a through k of Question 8.
- 10a. I had no ownership interest in Rockwool. I owned 1000 shares of Susquehanna Corporation when it was a public company. These shares were redeemed when Susquehanna was taken private and then I had no ownership interest in Susquehanna. I had no ownership interest in any of the other corporate entities.

- 10b. I was not an officer of Rockwool and so far as I can recall I was not a director.
- 10c. I did not make any personal loans to Rockwool or any corporate entity.
- 10d. I have never directly or indirectly guaranteed any loan to Rockwool or any corporate entity.
- 10e. I have never made any monetary payments for or on behalf of Rockwool or any corporate entities.
- 10f. I have never loaned, leased or rented any furnishings, fixtures, equipment, and personal property or real property to Rockwool or any of the other corporate entities.
11. I had no ownership interest in Rockwool. I bought 1000 shares of Susquehanna Corp. in approximately 1984 or 1985. The stock was redeemed for approximately \$5700 on or about 1989 when the company was taken private. The stock did not pay any dividends.
12. I do not know the names of the people who were responsible for inspecting the Site or for manufacturing mineral wool at the Site. Manufacturing at the Site ceased on or about the time I joined the Susquehanna Corp.
13. I do not know the names of the people who were responsible for managing and operating the Site.
14. I do not know the practices, policies, procedures and guidelines Rockwool used regarding the use, handling, storage and disposal of insulating wastes, "shot", or other hazardous substances at the Site. I do not have any documents relating to those practices, policies, procedures and guidelines.
15. I do not know the practices, policies, procedures and guidelines Rockwool used regarding the maintenance of the property nor do I have any documents relating to those practices, policies, procedures and guidelines.
16. I was shown through a mineral wool manufacturing plant in the 1980's, but I have no experience, training or special knowledge concerning the manufacture, research and development of mineral wool. Mineral wool is used as a building insulation in batt form and in sprayed form. It is transported to insulation applicators or distributors by truck. The non-fiberized "shot" by-product of the manufacturing process is placed in "shot" piles on the grounds of the manufacturing plant.
17. Since the Rockwool Pueblo site ceased to manufacture mineral wool at or about the time I came with Susquehanna, I do not know what measures were taken to prevent or minimize the possibility of a release or threat of release of chemicals into the environment at the Site. I have no documents which relate to any such measures. See my response to Question 8(l).

18. I do not know what measures Rockwool took to maintain or prevent the deterioration of buildings, equipment used in the research, development and manufacture of chemicals, storage tanks, impoundments, drums and other structures or containers at the Site. I have no documents that relate to such measures. See the response to Question 8(l).
19. Since I was not involved in day-to-day operations at the Site, I do not know of any incidents that occurred at the Site. The only environmental situation with which I am familiar occurred in the late 1980's after the closure of the manufacturing facility at the Site. See response 8(l).
20. In connection with the situation described in responses to 8(l) and 19 and as a result of the "clean-up" action by the State of Colorado, Susquehanna employed an environmental consulting firm in Ft. Collins. Employees of that firm conducted tests to determine the existence and extent of soil and groundwater contamination, and to assist in the preparation of a plan to contain the contamination. I do not remember the name of the firm or the employees who worked on the project. At the time I left Susquehanna, remediation plans were still in progress. I do not know the final resolution of this situation.

NOTARIZED CERTIFICATE

I, Fred L. Pundsack, having been duly sworn and being of legal age, hereby state:

1. I am the person authorized to respond to the Environmental Protection Agency's (EPA's) request for information concerning the Rockwool Industries Facility in Pueblo, Colorado.
2. I have made a complete and thorough review of all documents, information, and sources relevant to the request.
3. I hereby certify that the attached response to EPA's request is complete and contains all information and documents responsive to the request.

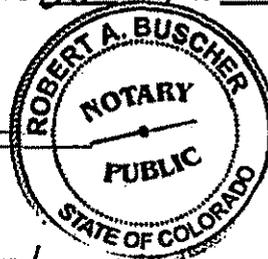
Fred L. Pundsack

(Signature)

Subscribed and sworn to me this 23rd day of August, 2000.

[Signature]

Notary Public



My Commission Expires 6/28/2004

My address is 2555 S. Colorado Blvd
Denver Co 80222

Received
Office of Enforcement
AUG 24 2000
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