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August 11, 2000

VIA FEDERAL EXPRESS

United States Environmental Protection Agency
David Broste, 8ENF-T
999 18th Street
Suite 500
Denver, CO 80202-2466

Re: Rockwool Industries Facility Located in Pueblo, Colorado (the "Site")
Response to Request for Information Pursuant to §104 of CERCLA

Dear Mr. Broste:

Altheimer & Gray represents Charles P. Gallagher ("Mr. Gallagher") and is filing this response on Mr. Gallagher's behalf. This letter responds to the July 26, 2000 Request for Information pursuant to Section 104 of CERCLA (the "Request") from the United States Environmental Protection Agency (the "USEPA") relating to the Site. The Request required a response within fifteen (15) days of receipt.

Mr. Gallagher was only involved with The Susquehanna Corporation and, indirectly, Rockwool Industries, Inc. (only because Rockwool Industries, Inc. was a subsidiary of The Susquehanna Corporation) from March 1980 through March 1985, and only has information related to that time period. All information provided herein only relates to that time period (unless stated otherwise).

Pursuant to CERCLA §104, you asked for the following information:

1. Question: Identify the person(s) answering these Questions on behalf of Respondent.

Answer: Sean W. Bezark, for Altheimer & Gray, 10 South Wacker Drive,
Suite 4000, Chicago, Illinois 60606-7482

2. Question: For each and every Question contained herein, identify all persons consulted in the preparation of the answer.

Answer: Charles P. Gallagher
Wayne C. Kocourek

Received
Office of Enforcement
AUG 14 2000
Compliance & Env. Justice

CHICAGO WASHINGTON, D.C. SPRINGFIELD, IL WARSAW PRAGUE KYIV
BRATISLAVA ISTANBUL SHANGHAI BUCHAREST

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3. For each and every Question contained herein, identify documents consulted, examined, or referred to in the preparation of the answer or that contain information responsive to the Question and provide accurate copies of all such documents.

Answer: None.

4. Question: Identify any corporate entity, including, but not limited to, Rock Wool Insulating Company, The Susquehanna Corporation, American Gypsum, Societe d'Etude et Exploration Industrielle, S.A., Kelsey - Ferguson Company, Susquehanna Western Corporation, and Susquehanna Leasing, Inc. that may have or have had an ownership or operational interest in the Site. For each such entity, provide the full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.

Answer: From March 1980 through March 1985 (which is the only time period of which Mr. Gallagher has knowledge) the Site was owned and operated by Rockwool Industries, Inc. Rockwool Industries, Inc. was a wholly owned subsidiary at The Susquehanna Corporation. From 1980 through 1985, The Susquehanna Corporation had two divisions; one manufactured valves and the other, Rockwool Industries, Inc., manufactured rock wool. These entities were corporations. Mr. Gallagher has no knowledge regarding the other entities.

5. Question: Describe in detail the relationship between Rockwool Industries, Inc. (Rockwool), Rock Wool Insulating Company, The Susquehanna Corporation, American Gypsum, Societe d'Etude et Exploration Industrielle, S.A., Kelsey - Ferguson Company, Susquehanna Western Corporation, Susquehanna Leasing, Inc., and any other entity identified in your response to Question 4 above. Your response should include, but not be limited to, the following information:

a. The nature and extent of any ownership interest that any of these other corporate entities may have had in Rockwool, including whether any of these corporate entities owned a majority or significant amount of capital stock of Rockwool, and when and how such ownership interest was acquired.

Answer: From March 1980 through March 1985 (which is the only time period of which Mr. Gallagher has knowledge), Rockwool Industries, Inc. was a wholly owned subsidiary of The Susquehanna Corporation. Mr. Gallagher has no knowledge regarding the other entities.

b. Whether any of these other corporate entities and Rockwool now have, or have ever had, common directors or officers. If so, identify such persons, in accordance with Definition 4 provided above, and provide the dates of service.

Answer: Unknown.

- c. Identify Rockwool's amount of capitalization and compare its amount of capitalization to similar entities in the same business (i.e., is it greater or lesser than companies of like size and sales).

Answer: Unknown.

- d. Whether any of the employees, officers, and/or directors of Rockwool have their salaries or other employment benefits, including, but not limited to, paying the employees', officers', and/or directors' share to participate in any manner in any savings programs, ESOPs, pension plans, deferred compensation, health care premium, insurance premium or other financial benefit, paid by any of these other corporate entities. If so, explain in detail.

Answer: Unknown.

- e. Whether Rockwool was required to seek, or received, any of these other corporate entities' approval or concurrence when making expenditures. If so, please explain in detail.

Answer: Material capital expenditures required The Susquehanna Corporation management and board approval. The Susquehanna Corporation was not involved in the operational management of Rockwool Industries, Inc.

- f. Whether any of these other corporate entities provided any assistance, guidance or input of any nature to Rockwool in the preparation of Rockwool's business strategy, business goals, etc. If so, explain in detail.

Answer: Once formulated, business strategies and business goals of Rockwool Industries, Inc. were reviewed by The Susquehanna Corporation board.

- g. Whether any of these other corporate entities provided any clerical, administrative, professional or other services or assistance to Rockwool or vice versa. If so, provide a complete description of the nature of services or assistance provided, along with the time period(s) during which such service or assistance was provided.

Answer: The Susquehanna Corporation would have provided services to Rockwool Industries, Inc. as is common in a parent/subsidiary arrangement, such as tax, medical, insurance.

- h. Whether any of these other corporate entities loaned, leased or rented any furnishings, fixtures, equipment, personal property, or real property to Rockwool or vice versa. If so, describe the type of property leased or rented, and the terms and duration of such an arrangement.

Answer: No.

- i. Whether any of these other corporate entities and Rockwool have ever transacted business with each other. If yes, provide complete information regarding the nature and extent of such transactions or business relationship.

Answer: Unknown.

- j. Identify and describe any other pending or previous federal, state or local environmental violation(s) or alleged violation(s) by any of these other corporate entities and all past or present affiliated companies, including parent and subsidiary companies, and any of its officers, directors or managers, in any location(s) other than the Site.

Answer: Unknown.

6. Question: Provide documentation, including, but not limited to, any and all of the following produced, generated or otherwise prepared by Rockwool in the most recent year of its operations or existence (whichever date is earlier):

- a. Certified auditor statements contained in any monthly, quarterly or annual report prepared in these entities' normal course of business;

Answer: Mr. Gallagher's involvement with The Susquehanna Corporation ceased in March 1985. He has no information or documentation regarding the most recent year of its operations or existence.

- b. Any financial information provided to officers, directors or shareholders of the company in the normal course of business;

Answer: Mr. Gallagher's involvement with The Susquehanna Corporation ceased in March 1985. He has no information or documentation regarding the most recent year of its operations or existence.

- c. Any financial information or reports submitted to the U.S. Securities and Exchange Commission or the State of Colorado Department of Revenue or Secretary of State's office;

Answer: Mr. Gallagher's involvement with The Susquehanna Corporation ceased in March 1985. He has no information or documentation regarding the most recent year of its operations or existence.

- d. Any financial information or reports submitted to the U.S. Internal Revenue Service, including corporate or partnership tax returns or estimated tax payments.

Answer: Mr. Gallagher's involvement with The Susquehanna Corporation ceased in March 1985. He has no information or documentation regarding the most recent year of its operations or existence.

7. Question: Identify all officer and director positions that you have held in Rockwool, or any of its subsidiaries, predecessors, or affiliated companies, including, but not limited to, any of the companies identified in response to Question #4. State the dates that you held each position. Describe your duties and responsibilities and identify the person or persons to whom you reported for direction in each such position. Provide copies of any employment contracts or agreements, position descriptions, correspondence, or other documents that describe your responsibilities, duties, and reporting relationships.

Answer: Mr. Gallagher was President and CEO and a Director of The Susquehanna Corporation from March 1980 to March 1985. His duties were those usually conducted by a person holding such positions. He reported to the Chairman of the Board. Mr. Gallagher has none of the documents requested. Mr. Gallagher does not recall whether he held an officer or director position in Rockwool Industries, Inc.

8. Question: Describe your role in the following activities regarding the operations of Rockwool at the Site:

- a. choosing and acquiring rights to conduct operations at the Site (including negotiating and drafting leases or purchasing the property);

Answer: None.

- b. choosing to utilize manufacturing methods at the Site;

Answer: None.

- c. selection of contractors for design, engineering, construction, and operation of the Site;

Answer: None.

- d. selection of management personnel at the Site;

Answer: None.

e. applying for permits to operate at the Site;

Answer: None.

f. supervision of staff at the Site;

Answer: None.

g. development of budgets for Site operations;

Answer: None.

h. development of schedules for Site operations;

Answer: None.

i. arranging for financing to conduct operating activities at the Site;

Answer: None.

j. selection of methods and locations for disposal of waste materials at the Site;

Answer: None.

k. monitoring of environmental conditions at the Site; and

Answer: None.

l. negotiation of any environmental cleanup agreement with any local, state or federal government division, department or agency.

Answer: None.

9. Question: Identify all past and present corporate officers and directors of Rockwool that were involved in any of the functions listed in a. through k. of Question 8 above and describe their roles in the performance of those functions.

Answer: The following past corporate officers may have been involved with said functions: Nick Dye, David Sullivan, Peter Erdenberger (V.P. Manufacturing), Carl Cox (V.P. Finance)

10. Question: Please describe in detail your financial relationship with Rockwool or any other corporate entities identified in response to Question #4. Your response should include, but not be limited to, the following information:

- a. The nature and extent of any ownership interest you have in these corporate entities, including whether you owned a majority or significant amount of the capital stock of Rockwool, and when and how such ownership interest was acquired.

Answer: Mr. Gallagher has no ownership interest in any of the referenced entities. In the early 1980s, Mr. Gallagher may have participated in The Susquehanna Corporation's Stock Option incentive plan. Mr. Gallagher has no recollection as to the number of options he may have exercised as part of the incentive program, although he knows that at no time did he own a majority or a significant amount of the capital stock of The Susquehanna Corporation. At all times Mr. Gallagher was involved with The Susquehanna Corporation, it was a publicly traded company listed on the American Stock Exchange. At no time did Mr. Gallagher own any stock of Rockwood Industries, Inc.

- b. Whether you were a director or officer of any of these corporate entities. If yes, provide the dates of service.

Answer: Mr. Gallagher was the President, CEO and a Director of The Susquehanna Corporation from March 1980 through March 1985.

- c. Whether you have made a personal loan to Rockwool or any of these corporate entities. If so, please provide complete information pertaining to such loan(s). For the purposes of this question, "loan" shall include the establishment of a line of credit for the use and/or benefit of Rockwool or any of these corporate entities.

Answer: No

- d. Whether you have ever directly or indirectly guaranteed any loan made to Rockwool or these other corporate entities. If so, provide complete information regarding such arrangement, including copies of all documents pertaining to such arrangement.

Answer: No

- e. Whether you have ever made any monetary payment for or on behalf of Rockwool or these corporate entities. If so, provide copies of all documents pertaining to such payments.

Answer: No

- f. Whether you have ever loaned, leased or rented any furnishings, fixtures, equipment, personal property, or real property to Rockwool or these other corporate entities. If so, provide a complete description of the type of property leased or rented, the terms and duration of such an arrangement, and any benefit you received from such an arrangement.

Answer: No

11. Question: Provide all records related to your acquisition, ownership and disposal of stock in or other ownership interest in Rockwool or any other corporate entities identified in response to Question #4 and any of their subsidiaries, predecessors, or affiliated companies. State the amounts of money you realized from dividends and from sales of such stock.

Answer: Mr. Gallagher has no such records. Mr. Gallagher has no recollection as to the amounts, if any, he realized from dividends or from sales of stock of The Susquehanna Corporation. At no time did Mr. Gallagher own any stock of Rockwool Industries, Inc.

12. Question: Identify each person responsible in any way for inspecting the Site or for manufacturing mineral wool at the Site, and in each case specify such person's responsibilities, the time period that such person performed those responsibilities, and the purpose for the inspection or evaluation.

Answer: Peter Erdenberger, Vice President, Manufacturing

13. Question: Identify each person responsible in any way for managing and operating the Site and/or Rockwool, including without limitation, each person who participated in the maintenance of the buildings, equipment, storage tanks, impoundments, and other structures or containers at the Site, and in each case specify such person's responsibilities and the time period that such person performed those responsibilities.

Answer: Peter Erdenberger, Vice President, Manufacturing

14. Question: Describe all practices, policies, procedures and guidelines of Rockwool which governed the use, handling, storage or disposal of any and all insulating wastes or "shot" or other hazardous substances at the Site and provide all such documents establishing, setting forth, or referring to such practices, policies, procedures and guidelines.

Answer: Unknown

15. Question: Describe all practices, policies, procedures and guidelines Rockwool regarding the maintenance of property, including, but not limited to any building, storage tanks, impoundments, drums, waste piles and other structures or containers at the Site and provide all such documents establishing, setting forth, or referring to such practices, policies, procedures and guidelines.

Answer: Unknown

16. Question: Describe all experience, training, and special knowledge you have regarding mineral wool insulation manufacturing, research and development and when such knowledge was acquired, including, without limitation, the use, storage, disposal, handling, and transportation of mineral wool insulation such as those conducted at the Site.

Answer: None

17. Question: State each measure which you, Rockwool or any other corporate entities identified in response to Question #4 ever took to prevent or minimize the possibility of a release or threat of release of chemicals into the environment from any building, storage tanks, impoundments, drums, and other structures or containers at the Site, and identify each document which contains information related to such measures taken.

Answer: Unknown

18. Question: State each measure which you, Rockwool or any other corporate entities identified in response to Question #4 ever took to maintain or prevent the deterioration of buildings, all equipment used in the research, development and manufacturing of chemicals, storage tanks, impoundments, drums, and other structures or containers at the Site, and identify each document which contains information related to such measures taken, including, but not limited to, all receipts, bills, and work orders for maintenance of structures and equipment at the Site.

Answer: Unknown

19. Question: Describe each incident which has occurred at the Site since Susquehanna Corporation's acquisition of the Rockwool Industries Facility in 1965 in which any mineral wool insulation manufacturing waste or any hazardous substance has leaked, dripped, spilled, or has otherwise been released into the environment.

Answer: Unknown

For each such occurrence:

- a. state the type and quantity of the substance which was leaked, dripped, spilled or otherwise released;

Answer: Unknown

- b. state the location at which the leakage, drip, spill, or other release occurred;

Answer: Unknown

- c. state the date on which the leak, drip, spill or other release occurred, or if unknown, state the date on which it was discovered;

Answer: Unknown

- d. state the cause of the incident;

Answer: Unknown

- e. state all actions, if any, taken by you or any other person in response to the incident;

Answer: Unknown

- f. identify all persons with knowledge of such incident; and

Answer: Unknown

- g. identify any reports or other documents relating to the incident.

Answer: Unknown

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20. Question: State whether the current or former employees, agents or contractors of Rockwool or any other corporate entities identified in response to Question #4 ever performed any study or conducted any investigation or test since 1965 to determine the existence and extent of any chemical contamination of soils or groundwater at or near the Site. If your answer is in the affirmative, then for each study provide the name and date of the study and describe the nature of the study or investigation and identify all persons who conducted the study.

Answer: Unknown

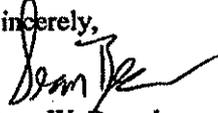
Please be advised that the responses contained herein are based on (i) diligent investigation of Mr. Gallagher's files, and (ii) Mr. Gallagher's recollection of matters which occurred approximately fifteen to twenty years ago. Mr. Gallagher is continuing his investigation and reserves the right to supplement, supplant, amend and/or otherwise modify this response with additional information and documents that he discovers as a result of his ongoing investigation. No part of this response is intended to be or should be construed by the USEPA or any other third party as an admission of fault or liability, or a waiver or abandonment of any rights, defenses, claims or causes of action.

Enclosed is Mr. Gallagher's Notarized Certificate.

Please direct all future correspondence, if any, regarding this matter to:

Sean W. Bezark
Alzheimer & Gray
10 South Wacker Drive
Suite 4000
Chicago, IL 60606-7482

Sincerely,


Sean W. Bezark
For Alzheimer & Gray

SWB:smw

cc: Charles P. Gallagher

NOTARIZED CERTIFICATE

I, CHARLES P. GALLAGHER, having been duly sworn and being of legal age, hereby state:

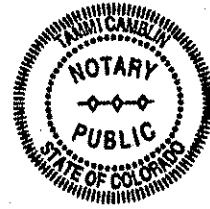
1. I am the person authorized to respond to the Environmental Protection Agency's (EPA's) request for information concerning the Rockwool Industries Facility in Pueblo, Colorado.
2. I have made a complete and thorough review of all documents, information, and sources relevant to the request.
3. I hereby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

Charles P. Gallagher

(Signature)

Subscribed and sworn to me this 1st day of August, 2000.

Jammi Camblin
Notary Public



MY COMMISSION EXPIRES:
December 18, 2002

My Commission Expires _____

My address is Charles P. Gallagher
370-17th St., Ste. 5600
Denver, Colorado 80202