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Robert L. Rasmussen
5770 Green Oaks Dr.
Littleton, CO 80121

Received
Office of Enforcement
AUG 25 2000
Compliance & Env. Justice

August 24, 2000

United States EPA
Region 8
999 18th Street - Suite 300
Denver, CO 80202-2466

Re: Information for Rockwool Industries Pueblo,
CO site pursuant to Section 104 of CERCLA

Dear Sir or Madam:

The following are my answers to the questionnaire regarding the above information request.

1. Robert L. Rasmussen
2. Elizabeth Mitchell and Paul Phillips of Holland and Hart LLP were consulted regarding legal matters.
3. My employment with Susquehanna Corporation began in June 1982 and terminated in January 1991. I have no records in my possession relating to these questions and have consulted no related documents in preparing my response.
4. Rockwool Industries Inc.(Rockwool) owned and operated the site. Rockwool, a Corporation, manufactured and distributed mineral wool used primarily for residential insulation. Mineral wool is a product produced by melting rock or slag material at high temperature and turning it into a fiber which has favorable insulating properties. I believe all production activities at the site ceased in July or August of 1982. I do not have addresses for Rockwool or know whether it currently exists.
5.
 - a. Rockwool Industries, Inc. was a wholly owned subsidiary of Susquehanna Corporation during my tenure at Susquehanna. I do not know how or when the ownership interest was acquired except that it occurred prior to 1982. Societe d'Etude et Exploration Industrielle(SEEI) was the parent company of Susquehanna and was headquartered in Paris, France. Until 1987, SEEI owned approximately 50% interest in Susquehanna. The remaining interest was traded on the American Stock exchange and was widely held. In 1987, SEEI took the company private in a cash merger transaction thereby acquiring a 100% interest in Susquehanna. Kelsey Ferguson, Susquehanna Western, and Susquehanna Leasing were inactive subsidiaries of Susquehanna.
 - b. I believe that I was a director of Rockwool from 1987 to my departure. I held the title of Treasurer or Vice President Finance for Rockwool after 1987. I believe Fred Pundsack was also a director of Rockwool and was President of Rockwool from approximately 1987 to my departure. Mr. Pundsack was President of Susquehanna and Chairman of the Board from approximately 1985 until my departure. I am not aware of the officers and directors of the other corporate entities listed in question 5.
 - c. I do not recall the capitalization of Rockwool. Therefore, I cannot compare the capitalization to other similar companies.
 - d. The retirement plan for all employees of Susquehanna was a 401K program at the time of my departure. I withdrew my funds many years ago. I do not know of any other employment plans, salaries, or retirement benefits paid by the corporate entities listed in question 5.

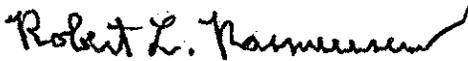
- e. Rockwool would seek and receive approval of Susquehanna for significant capital expenditures. I do not recall specific approval limits for capital expenditures.
 - f. Susquehanna management would review business plans and would provide advice on marketing initiatives with the intention of expanding the business in a profitable manner. Meetings between Susquehanna and Rockwool personnel occurred periodically to evaluate progress in achieving objectives. These activities were typical of an arms length parent/subsidiary relationship.
 - g. During my tenure, Susquehanna provided, at various times, tax, treasury, cash management, and human resource functions for Rockwool.
 - h. I believe Susquehanna subleased a portion of the headquarters office to Rockwool from at least 1982 to 1986. During that time Rockwool had its headquarters staff in Denver. I do not recall if a formal sub-lease document was in place.
 - i. I do not recall any intercompany business transacted.
 - j. Rockwool's Belton, Texas manufacturing facility closed in 1987. After a site assessment, Rockwool found limited ground water contamination below the site. The situation was reported to the Texas Water Commission and a plan for remediation was developed. When I left the company, negotiations were in process to implement the plan. Rockwool was named a small scale PRP in the Stringfellow, California Superfund site in the early 1980's. Rockwool had a manufacturing facility in Fontana, California which sent water to the site for disposal in the 1960's. The disposition of the claim was pending when I left the company. Susquehanna owned the National Fireworks site in Boston, Massachusetts in the 1960's and 1970's. The facility was used to produce explosives from World War II through the Vietnam War. Contamination was found on the site due to barrels containing TCE. The EPA was involved and a cleanup was completed in the late 1980's. The Susquehanna Western site in Lander, Wyoming was a former uranium mining facility. Site reclamation was completed in the late 1980's under direction the of the BLM.
6. a. Since I am no longer an employee, I do not possess or have access to these records.
- b. Since I am no longer an employee, I do not possess or have access to these records.
- c. Since I am no longer an employee, I do not possess or have access to these records.
- d. Since I am no longer an employee, I do not possess or have access to these records.
7. I joined Susquehanna as Assistant Controller in June 1982. This was not an officer position. I reported to Jack Thompson, Controller. In approximately July 1984, I was promoted to Controller of Susquehanna. I reported to Wayne Kocourek, Chief Financial Officer. In approximately April 1986, I was promoted to Vice President and Chief Financial Officer of Susquehanna. I held that position until leaving in January 1991. I reported to Fred Pundsack, President and CEO. I believe I was a director of Rockwool from about 1987 to my departure and was an officer at the same time. My responsibilities for Susquehanna were financial reporting, planning, budgeting and administration. I did not retain documentation such as position descriptions relating to my duties and was not under employment contract.
8. a. I had no role in the specified activity.
- b. I had no role in the specified activity.
- c. I had no role in the specified activity.

- d. I had no role in the specified activity.
 - e. I had no role in the specified activity.
 - f. I had no role in the specified activity.
 - g. I had no role in the specified activity.
 - h. I had no role in the specified activity.
 - i. I had no role in the specified activity.
 - j. I had no role in the specified activity.
 - k. I had no role in the specified activity.
- l. After the site had been out of production for several years, it was put up for sale as a production facility. Efforts to sell the property were not successful and Rockwool opened negotiations to donate the site to the Pueblo Economic Development Company (Pedco). Rockwool conducted an environmental assessment of the site in 1988 or 1989 and found the waste pile was a source of potential contamination. The potential contamination was reported to the Colorado State Department of Health and a plan for capping the waste pile was developed. The environmental conditions at the site were disclosed to the State Department of Health. I participated in at least three meetings with the State Department of Health regarding cleanup plans. These discussions were ongoing at the time of my departure from Susquehanna and I am not aware of what was ultimately decided relating to the site.
9. Nick Dye was President of Rockwool from approximately 1980 to 1984. Peter Erdenberger was Vice President Manufacturing from at least 1982 to 1985. They would have been involved in items a through k in the final years of site operation. I have no other knowledge of anyone involved in items a through k.
10. a. Prior to 1987, I owned approximately 1000 shares of Susquehanna common stock. I purchased the stock at approximately \$3 per share. The stock was acquired through an open market purchase.
- b. Please refer to item 7.
 - c. I never made personal loans of any kind to any of these entities.
 - d. I never made personal guarantees of any kind for these entities.
 - e. I never made personal monetary payments for or on behalf of these entities.
 - f. I never loaned, leased, or rented property to these entities.
11. I have no records related to my acquisition, ownership or disposal of the Susquehanna common stock. I never received dividends on the stock. I sold the stock at \$6 per share in 1987.
12. I have no knowledge of the person responsible for inspecting the site or manufacturing mineral wool at the site.
13. I do not know of the person responsible for managing or operating the site when the plant was in operation.

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14. I was not involved in site operations and I do not know of practices, policies, procedures or guidelines which governed the use, handling, storage, or disposal of insulating wastes, shot or other hazardous substances at the site.
15. I do not know of maintenance practices, policies, procedures, or guidelines at the site since I had no responsibility for plant operations.
16. I had no special knowledge of Rockwool activities including manufacturing and research and development or handling and transportation of the material.
17. I do not have any such information regarding measures to minimize environmental releases at the site during its operation. In 1989, after the site assessment was undertaken, I participated in negotiations to implement the site remediation plan. Please see response 8(l).
18. While the site was in operation, I had no involvement in any maintenance activities. After the site closed, Rockwool placed a fence around the property to restrict access. I have no documentation relating to the site or its maintenance.
19. I have no knowledge of matters referred to in items a through g. Please see response 8(l).
20. Please see response 8(l). A site evaluation was conducted in 1988 or 1989. I am not sure of the company conducting the study. Water, Waste and Land of Fort Collins, Colorado provided assistance in developing a remediation plan. This activity was in progress when I left the company.

Sincerely,



Robert L. Rasmussen

State: Virginia
City: Newport News

ENCLOSURE 2

NOTARIZED CERTIFICATE

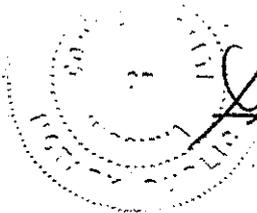
I, Robert L. Rasmussen, having been duly sworn and being of legal age, hereby state:

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.

Robert L. Rasmussen

(Signature)

Subscribed and sworn to me this 24th day of August, 2000.



Susan M. Arno
Notary Public Susan M. Arno

My Commission Expires Nov 30, 2002

My address is 161 Enterprise Dr.
Newport News, VA 23603