

CERCLA SECTIONS 301(a)(1)(B) AND (D)  
HAZARDOUS SUBSTANCE RESPONSE TRUST FUND  
RECEIPTS, OBLIGATIONS, AND DISBURSEMENTS

- FINAL REPORT -

OFFICE OF SOLID WASTE AND EMERGENCY RESPONSE  
U.S. ENVIRONMENTAL PROTECTION AGENCY

December 4, 1984

CERCLA SECTION 301(a)(1)(B) AND (D)  
THE HAZARDOUS SUBSTANCE RESPONSE TRUST FUND  
RECEIPTS, OBLIGATIONS, AND DISBURSEMENTS

T A B L E O F C O N T E N T S

	<u>PAGE NUMBER</u>
I. INTRODUCTION . . . . .	1
II. CERCLA SECTION 301(a)(1)(B) SUMMARY OF SUPERFUND RECEIPTS, OBLIGATIONS, AND DISBURSEMENTS. . . . .	2
1. Trust Fund Receipts, Obligations, and Disbursements . . . . .	2
2. Obligations and Disbursements By Superfund Activity . . . . .	5
3. Interagency Support . . . . .	7
III. CERCLA SECTION 301(a)(1)(D) REVIEW OF COST RECOVERY ACTIONS. . . . .	11
1. Superfund Cost Recovery Strategy . . . . .	11
2. Summary of Cost Recovery Actions . . . . .	12
3. Cost Recovery Settlements/Judgments . . . . .	13
4. Cost Recovery Actions Filed by DOJ. . . . .	13

## I. INTRODUCTION

The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA or Superfund) establishes Federal authority to respond to the release or potential release of hazardous substances, pollutants, or contaminants into the environment. The Act establishes the Hazardous Substance Response Trust Fund (Fund) to finance response activities. Under Executive Order 12326, the Environmental Protection Agency (EPA) was assigned primary responsibility for managing and implementing the hazardous substance release cleanup effort.

Section 301(a)(1) of CERCLA requires the President to submit a series of studies to Congress on the experience with implementing the Act. The studies are intended to provide Congress with an assessment of the accomplishments and impacts of the Superfund program. Paragraph (B) of section 301(a)(1) specifically requires "a summary of past receipts and disbursements from the Fund." Paragraph (D) requires a study of the Superfund program's "record and experience in recovering Fund disbursements from liable parties."

This report was designed to meet the requirements of sections 301(a)(1)(B) and (D). Paragraphs (B) and (D) have been combined into one study because both paragraphs, in effect, call for a review of the financial aspects of the Fund's uses and receipts. Since cost recoveries are receipts into the Fund, the cost recovery summary required by paragraph (D) supplements the summary of receipts required by paragraph (B).

## II. CERCLA SECTION 301(a)(1)(B) SUMMARY OF SUPERFUND RECEIPTS, OBLIGATIONS, AND DISBURSEMENTS

The objective of the CERCLA section 301(a)(1)(B) study is to present descriptive reports summarizing past receipts into and disbursements from the Fund.

### 1. TRUST FUND RECEIPTS, OBLIGATIONS, AND DISBURSEMENTS

Exhibit A on the following page summarizes Fund transactions by fiscal year and indicates:

- . Receipts - comprised of excise taxes levied on various petrochemicals, inorganic raw materials, and crude oil and petroleum products; interest on the invested balance of the Fund; recoveries from responsible parties of funds spent to cleanup hazardous substance releases; appropriations from the General Fund; and a one-time transfer from a fund established by Section 311 of the Clean Water Act.
- . Appropriations - the portion of the Trust Fund made available by Congress for obligation.
- . Obligations - legal commitments of the Fund for specific response activities.
- . Disbursements - actual outlays of the Fund for work completed.

By summarizing Fund receipts and disbursements, Exhibit A fulfills the mandate of CERCLA section 301(a)(1)(B). Exhibit A also includes appropriations because they represent the actual amount of the receipts available for use, and obligations because they indicate the entire amount of funds EPA is planning to disburse.

The receipt and disbursement data in Exhibit A were compiled from the U.S. Department of Treasury monthly reports. The monthly data were aggregated yearly for all data elements except interest income. Since the Treasury reports do not show receipts until they are actually deposited into the Fund, they may not reflect the actual interest income earned for that month. Although interest on the Treasury Bill investments results from purchase of the Bill at a discount and is not received and recorded until the redemption (at the time of sale or maturity) of

**EXHIBIT A**

**HAZARDOUS SUBSTANCE RESPONSE TRUST FUND RECEIPTS, OBLIGATIONS, AND DISBURSEMENTS  
(THOUSANDS OF DOLLARS)**

	<u>FY 1981</u>	<u>FY 1982</u>	<u>FY 1983</u>	<u>FY 1984</u>	<u>TOTAL</u>	<u>FY 1985 (Estimate)</u>	<u>PROJECTED TOTAL END FY 1985</u>
Unappropriated Balance, Start of Year. . . .	---	78,293	229,050	350,609	---	277,190	---
<b>Receipts</b>							
Excise Taxes . . . .	127,900	243,994	230,225	261,235	863,354	276,000	1,139,354
Interest (1) . . . .	9,393	67,854	60,978	77,941	216,166	31,000	247,166
Fines and Recoveries	0	2,309	356	3,440	6,106 (2)	46,000	52,106
Appropriations from the General Fund .	9,000	26,600	40,000	44,000	119,600	44,000	163,600
311 Fund Transfer	6,743	---	---	---	6,743	---	6,743
<b>Total Receipts . . . .</b>	<b>153,036</b>	<b>340,757</b>	<b>331,559</b>	<b>386,616</b>	<b>1,211,969 (2)</b>	<b>397,000</b>	<b>1,608,969</b>
Appropriations . . . .	74,743	190,000	210,000	460,000	934,743	620,000	1,554,743
Obligations (3) . . . .	40,283	180,744	230,233	465,619	916,879	651,000 (4)	1,567,879
Unappropriated Balance, End of Year . . . .	78,293	229,050	350,609	277,225	277,226 (2)	54,226	54,226
Disbursements . . . .	8,039	79,576	147,803	285,279	520,697	448,000 (4)	968,697
Unexpended Balance Trust Fund . . . . .	144,997	406,178	589,934	691,271 (5)	691,272 (2)	640,272	640,272

(1) Includes unamortized interest.

(2) Total does not add due to rounding.

(3) Does not include offsetting collections from other Federal agencies.

(4) Preliminary number based on \$620,000 appropriation.

(5) Includes unamortized interest (\$73.7 million) on investment maturing September 1985.

the investment instrument, it is actually being earned throughout the period from purchase to redemption. The interest income reported in Exhibit A for a given fiscal year includes the amount of interest paid into the Fund during the fiscal year plus any unamortized interest (interest earned but not yet paid) minus the unamortized interest included in the previous fiscal year.

The appropriation and obligation data were acquired from EPA's Financial Management System. These totals are end-of-year figures which do not include offsetting collections from other Federal agencies or deobligations.

CERCLA sections 221 and 303 provide for maximum authorizations for appropriations from the General Fund and excise tax collections of \$220 million and \$1.38 billion, respectively, by September 30, 1985.

Exhibit A shows that as of September 30, 1984, \$1.2 billion in total receipts had been deposited into the Fund and \$520.7 million had been disbursed, leaving a balance of \$691.3 million. The greatest portion of receipts, \$863.4 million or 71.2 percent, was derived from excise taxes. Annual tax collections reached a high of \$261.2 million in FY 1984, with projections for FY 1985 of \$276.0 million. Interest receipts totaled \$216.2 million for the four fiscal years and at 17.8 percent were the second largest category of receipts.

A total of \$6.1 million, or .5 percent of total receipts, had been collected from responsible parties and deposited into the Fund as of September 30, 1984 with 56.3 percent of this total collected in FY 1984. EPA estimates \$46 million in cost recoveries for FY 1985. No fines or penalties had been reported as Fund receipts.

Appropriations from the General Fund totaled \$119.6 million and comprised 9.9 percent of receipts during the four fiscal years while the 311 Fund transfer provided .6 percent of total receipts.

Congress appropriated (i.e., made funds available for obligation) \$934.7 million of the \$1.2 billion in total receipts over the four fiscal years. Of the \$934.7 million appropriated, \$916.9 million was obligated for Superfund activities. EPA projects an estimated 39.8 percent increase in obligations in FY 1985. Disbursements also increased each year and totaled \$520.7 million for the four fiscal years. The unexpended balance of the Fund projected for FY 1985 is \$640.3 million.

## 2. OBLIGATIONS AND DISBURSEMENTS BY SUPERFUND ACTIVITY

Exhibit B was developed to show how Fund money has been used. Exhibit B presents obligations and disbursements by Superfund activity. The obligation and disbursement data in this exhibit were acquired from EPA's Financial Management System (FMS). Both the obligation and disbursement data were supplemented by data on transfer allocations (Transfer IAGs) of CERCLA funds reported by other Federal agencies with Superfund responsibilities (Interagency Support). Transfer IAGs are not reported in FMS since they are not considered obligations by EPA. Transfer IAGs are included in these exhibits because they are a use of Fund money and will be obligated and disbursed by the Federal agency to which the funds are transferred. Only the obligations and disbursements reported by the agency which received the transfer are included.

Exhibit B indicates Superfund program obligations and disbursements by the following program activities:

- Hazardous Substance Response - This category includes all activities associated with removal and remedial response actions. Removal actions are short-term responses designed to prevent or mitigate an immediate threat caused by the release or potential release of hazardous substances into the environment. Remedial actions are longer-term responses designed to provide a permanent remedy.
- Enforcement - This category includes administrative and judicial efforts at specific sites designed to induce privately-financed cleanups and to reimburse the Fund for CERCLA-financed cleanup actions.
- Management and Support - This category includes overall program management and administrative support, training, and contingency planning.
- Research and Development - This category includes scientific and technical support provided by EPA's Office of Research and Development such as the evaluation and field testing of equipment as well as techniques for discovering, assessing, preventing, removing, and disposing of hazardous substances releases.

**EXHIBIT B**

**OBLIGATIONS AND DISBURSEMENTS BY SUPERFUND ACTIVITY  
(THOUSANDS OF DOLLARS)**

<u>ACTIVITY</u>	<u>FY 1981</u>	<u>FY 1982</u>	<u>FY 1983</u>	<u>FY 1984</u>	<u>TOTAL</u>
	<u>Obligations*</u>				
Hazardous Substance Response	30,761.6	149,009.6	175,902.4	366,746.1	722,419.7
Enforcement	2,317.1	8,364.4	17,669.7	26,697.4	55,048.6
Management and Support	2,323.9	9,511.2	11,396.1	17,183.3	40,414.5
Research & Development	4,740.5	13,813.2	6,818.5	10,171.0	35,543.2
Interagency Support	140.0	45.2	18,446.7	44,821.7	63,453.6
<b>Total</b>	<u>40,283.1</u>	<u>180,743.6</u>	<u>230,233.4</u>	<u>465,619.5</u>	<u>916,879.6</u>
	<u>Disbursements</u>				
Hazardous Substance Response	6,144.3	58,903.0	109,993.2	209,656.1	384,696.5
Enforcement	753.4	6,619.7	11,389.1	17,553.7	36,315.9
Management and Support	1,006.7	7,701.2	10,712.2	15,003.1	34,423.2
Research & Development	132.6	6,283.3	10,994.2	9,402.2	26,812.3
Interagency Support	1.7	69.2	4,714.6	33,664.2	38,449.7
<b>Total</b>	<u>8,038.7</u>	<u>79,576.4</u>	<u>147,803.3</u>	<u>285,279.3</u>	<u>520,697.6</u>

\*Obligations do not include offsetting collections from other Federal agencies.



- . Interagency Support - This category includes ongoing Superfund activities performed by other Federal agencies.

Total obligations increased 27.4 percent between FY 1982 and FY 1983 and more than doubled in FY 1984. Specifically, in FY 1984, Hazardous Substance Response obligations increased 108.5 percent. Interagency Support obligations increased each fiscal year along with the increase in Hazardous Substance Response. Obligations for Enforcement to induce privately-financed cleanup and cost recovery have also increased steadily since FY 1981.

As of September 30, 1984, \$520.7 million had been disbursed from the Fund for completed Superfund activities. The greatest portion of Fund disbursements, \$384.7 million or 73.9 percent, were made for Hazardous Substance Response. Disbursements from the Fund for work completed increased 85.7 percent in FY 1983 and 93.0 percent in FY 1984.

### 3. INTERAGENCY SUPPORT

Exhibit C-1 presents the total amount of CERCLA funds provided through Interagency Agreements (IAGs) to other Federal agencies for ongoing Superfund activities. The amount of each IAG and the amounts obligated and disbursed by the agency receiving the funds are shown. Exhibit C-2 presents the yearly distribution of the IAGs, obligations, and disbursements.

Two types of IAGs have been used to fund Interagency Support: Transfer IAGs and Reimbursable IAGs. Transfer IAGs have funded the following ongoing Federal support activities:

- . Services by the Department of Justice (DOJ) to carryout portions of the Superfund program intended to facilitate private party cleanup and cost recoveries.
- . Oversight and technical support of response actions in coastal and marine areas by the National Oceanic and Atmospheric Administration (NOAA).
- . Temporary and/or permanent relocation of individuals by the Federal Emergency Management Agency (FEMA).

- . Implementation of the health-related authorities of CERCLA by the Department of Health and Human Services (HHS).
- . Response management activities by the Department of the Interior (DOI) which support EPA's spill and site response.
- . Protection of personnel at Superfund sites by the Occupational Safety and Health Administration (OSHA), including development of specific health and safety guidelines.

Reimbursable IAGs have funded United States Coast Guard (USCG) on-site training, outfitting and enforcement activities, as well as maintenance of the National Response Center.

Exhibit C-1 indicates that a total of \$67.0 million had been provided to other Federal agencies for Inter-agency Support, \$63.5 million had been obligated and \$38.4 million had been disbursed as of September 30, 1984. FEMA received the greatest portion of funds (60.4 percent of the total), HHS received 21.9 percent of the total, DOJ received 8.4 percent of the total, and USCG received 7.7 percent of the total funds provided.

Exhibit C-2 shows that FY 1983 was the first fiscal year in which substantial Fund IAGs were made. Prior to FY 1983, DOJ was the only agency to receive CERCLA funds.

EXHIBIT C-1

INTERAGENCY SUPPORT  
 CUMMULATIVE TOTALS  
 (THOUSANDS OF DOLLARS)

FY 1981 THROUGH FY 1984

<u>AGENCY</u>	<u>IAG</u>	<u>OBLIGATIONS</u>	<u>DISBURSEMENTS</u>
DOJ	5,610.8	5,085.7	4,497.2
NOAA	615.0	599.7	410.2
FEMA	40,456.0	37,929.5	27,834.0
HHS	14,656.0	14,320.8	3,987.3
DOI	315.0	315.0	242.1
OSHA	151.6	13.7	5.6
USCG	5,189.2*	5,189.2	896.1
<b>Total All Agencies For All Fiscal Years</b>	<u><b>66,993.6</b></u>	<u><b>63,453.6</b></u>	<u><b>38,449.7</b></u>

---

\*Reimbursable IAG.

EXHIBIT C-2  
INTERAGENCY SUPPORT BY FISCAL YEAR  
(THOUSANDS OF DOLLARS)

<u>AGENCY</u>	<u>FY 1981</u>			<u>FY 1982</u>		
	<u>IAG</u>	<u>OBLIGA- TIONS</u>	<u>DISBURSE- MENTS</u>	<u>IAG</u>	<u>OBLIGA- TIONS (1)</u>	<u>DISBURSE- MENTS (2)</u>
DOJ	<u>175.0</u>	<u>140.0</u>	<u>1.7</u>	<u>60.0</u>	<u>45.2</u>	<u>69.2</u>
Total All Agencies per Fiscal Year	<u>175.0</u>	<u>140.0</u>	<u>1.7</u>	<u>60.0</u>	<u>45.2</u>	<u>69.2</u>

<u>AGENCY</u>	<u>FY 1983</u>			<u>FY 1984</u>		
	<u>IAG</u>	<u>OBLIGA- TIONS (1)</u>	<u>DISBURSE- MENTS (2)</u>	<u>IAG</u>	<u>OBLIGA- TIONS (1)</u>	<u>DISBURSE- MENTS (2)</u>
DOJ	2,008.4	1,987.2	1,482.8	3,367.4	2,913.3	2,943.5
NOAA	365.0	348.3	133.4	250.0	251.4	276.8
FEMA	13,461.5	7,455.5	1,464.1	26,994.5	30,474.0	26,911.6
HHS	9,656.0	7,140.9	1,634.3	5,000.0	7,179.9	2,353.0
DOI	0.0	0.0	0.0	315.0	315.0	277.6
OSHA	0.0	0.0	0.0	151.6	13.7	5.6
USCG (3)	<u>1,514.8</u>	<u>1,514.8</u>	<u>0.0</u>	<u>3,674.4</u>	<u>3,674.4</u>	<u>896.1</u>
Total All Agencies per Fiscal Year	<u>27,005.7</u>	<u>18,446.7</u>	<u>4,714.6</u>	<u>39,752.9</u>	<u>44,821.7</u>	<u>33,664.2</u>

(1) Obligations include some carryover of the unobligated balance of the Transfer IAG.

(2) Disbursements include dollars obligated in previous fiscal years.

(3) Reimbursable IAG.

### III. CERCLA SECTION 301(a)(1)(D) REVIEW OF COST RECOVERY ACTIONS

The objective of the CERCLA Section 301(a)(1)(D) study is to present descriptive reports summarizing cost recoveries from liable parties.

Section 107 of CERCLA authorizes the recovery of costs incurred by the Fund. In general, section 107 provides that past and present owners, operators, generators, and transporters of hazardous substances may be liable for the costs of removal or remedial actions undertaken at those sites and for damages to, or loss of, natural resources. Although the Agency generally favors actions that encourage responsible party cleanup efforts, EPA is authorized to use CERCLA funds for removal or remedial cleanup actions. For Fund-financed cleanups, EPA attempts to document and recover the maximum practicable amount of money due to the Fund from responsible parties that may be liable under section 107 of CERCLA.

Cost recovery includes any settlement or legal judgment whereby a responsible party deposits money into the Fund to cover CERCLA response costs. In other words, a cost recovery includes (1) money from responsible parties that reimburses the Fund for actual cleanup costs incurred as well as (2) upfront payments into the Fund from responsible parties to finance cleanup actions.

Exhibits D, E, and F of the 301(a)(1)(D) study do not include information on other private party response actions, where the parties either perform the cleanup activity or establish an escrow account to privately finance the response activity. To date, the Agency has successfully negotiated private party responses worth an estimated \$300 million. The 301(a)(1)(A) study which evaluates the overall effectiveness of the Superfund program provides a more comprehensive discussion of private party response actions.

#### 1. SUPERFUND COST RECOVERY STRATEGY

The figures presented here should be reviewed in the context of the Superfund cost recovery strategy. During the initial years of the Superfund program, cost recovery efforts were considered part of negotiations for a remedy. Cost recovery agreements, if pursued, were generally incorporated as one part of broader settlement agreements or legal judgments.

Cost recovery efforts were not priority activities in the initial years of the Superfund program for two reasons. First, initial Fund-financed removals were generally limited to emergencies that required a slow rate of Fund expenditures, so cost recovery of these actions was not emphasized. Second, initial program policies resulted in a slow rate of Fund expenditures for remedial activities. EPA chose to wait until the remedial response was entirely or substantially complete before initiating remedial cost recovery efforts. Since remedial actions take several years to complete, cost recovery efforts have only recently been initiated for these actions.

More recently, EPA began placing greater emphasis on the importance of cost recovery actions. In 1983, EPA increased the level of Fund-financed removal and remedial activity with greater reliance on cost recovery as a means of keeping the Fund solvent. The increased removal activity placed greater demands on the Fund which resulted in greater emphasis on cost recovery efforts.

CERCLA cost recovery efforts often involve complex and lengthy legal procedures. Generally, these efforts include three elements: documentation, issuance of a demand letter, and settlement with responsible parties. Complete documentation requires that the government document all costs it incurred, document any release or threat of release of a hazardous substance and the resultant liability of the responsible parties, and provide documentation to rebut the contention that site work was not consistent with the National Contingency Plan which implements CERCLA. EPA routinely issues a demand letter to parties liable for response costs summarizing the costs incurred and demanding payment for those costs. In response, liable parties may pursue negotiations for cost recovery settlement with EPA. If this approach fails, EPA refers the case to the Department of Justice (DOJ) for appropriate litigation. These legal procedures are often complicated by the presence of more than one responsible party.

## 2. SUMMARY OF COST RECOVERY ACTIONS

Exhibit D summarizes successful CERCLA section 107 cost recovery civil actions, as well as those actions filed by DOJ, referred to DOJ, or in development (to be referred to DOJ) at the end of FY 1984.

As of September 30, 1984, a total of 155 cost recovery actions had been initiated to recover funds valued at approximately \$144.4 million. Of the 155 actions, 33 were

successful cost recovery settlements/judgements for a total of \$6,641,196. In addition, 77 section 107 actions had been filed, 26 actions were pending (had been referred to DOJ), and 19 actions were in development (to be referred to DOJ). The approximate dollar value of these actions are \$117 million, \$13 million, and \$7 million, respectively.

### 3. COST RECOVERY SETTLEMENTS/JUDGEMENTS

Exhibit E presents successful cost recovery actions by region, site and fiscal year. As indicated earlier, cost recovery settlements/judgements had been reached at 33 sites for a total of \$6,641,196 as of September 30, 1984. During FY 1981, there was one cost recovery settlement/judgement for \$30,000. During FY 1982, there were three cost recovery settlements/judgements for a total of \$2,409,688 compared to 13 cost recovery settlements/judgements in FY 1983 for \$2,155,133. During FY 1984, 16 settlements/judgements were reached to recover response costs of \$2,046,375.

Many of these successful cost recoveries represent only partial reimbursement by a portion of the responsible parties at each site. The non-settling parties will generally be pursued for cost recovery. Of the 33 sites for which cost recovery has occurred, 23 sites are on EPA's National Priorities List (NPL), and 18 sites (NPL and non-NPL) have had a removal action taken.

EPA reports successful cost recoveries when settlements/judgements are reached. Exhibit E indicates the sites where a portion of the cost recovery has not yet been received from the responsible parties (i.e., collections outstanding).

### 4. COST RECOVERY ACTIONS FILED BY DOJ

Exhibit F provides an account of the actions filed by DOJ, including the site and approximate dollar value of recovery sought by EPA. As of September 30, 1984, there were 77 section 107 actions filed by DOJ. Of the 77 actions filed, 48 apply to sites on the NPL and 52 apply to sites (NPL and non-NPL) where a removal action has been taken.

EXHIBIT D

SUMMARY OF COST RECOVERY ACTIONS

	<u>NUMBER OF ACTIONS</u>	<u>VALUE OF ACTIONS</u>
Cost Recovery Settlements/Judgements	33	\$ 6,641,196
Cases filed by DOJ	77	117,688,300 (approx.)
Cases referred to DOJ	26	13,006,300 (approx.)
Cases in development	<u>19</u>	<u>7,049,200</u> (approx.)
	155	\$144,384,996



EXHIBIT E  
COST RECOVERY SETTLEMENTS/JUDGEMENTS

REGION	NPL	SITE/STATE	FISCAL YEAR OF SETTLEMENT/ JUDGEMENT	AMOUNT RECOVERED (\$)	REMOVAL ACTION(S) TAKEN
1	*	Woburn, MA	1982	60,000	
2	*	Lipari, NJ	1984	67,500	*
	*	Batavia Landfill, NY	1984	42,973	
3	*	Tybouts Landfill, DE	1983	13,400	
	*	ABM Wade, PA	1983	635,800 (1)	*
	*	McAdoo, PA	1983	4,800	
		Glenside Chloride, PA	1984	14,504	*
	*	Plastifax, MS	1983	226,369	*
4		Lenoir, NC	1984	113,306	*
	*	Bluff Road, SC	1984	95,000	*
5	*	Chem Central, MI	1982	140,000	
	*	Chem Dyne, OH	1982	2,209,688	*
	*	A&F Materials Olney, IL	1983	61,000	
	*	Enviro-Chem, IN	1983	651,606	*
	*	9th Avenue Dump, IN	1983	15,000 (2)	
	*	Velsicol, MI	1983	500,000	
	*	FMC, MN	1983	10,000	
	*	Oakdale, MN	1983	10,000	
	*	A&F Greenup, IL	1984	340,000 (3)	*
	*	Johns Manville, IL	1984	43,735 (3)	*
	*	East Bay Township, MI	1984	144,527	*
	*	Waste Disposal Engineering, MN	1984	25,000	
	*	Allied Chemical, OH	1984	35,000	
		Union Carbide Dioxin Site, OH	1984	5,000 (3)	
6	*	Cleve-Reber, LA	1983	7,646	*
	*	Petro Processors, LA	1984	600,000	
		Pronto Services, NM	1984	26,930	*

EXHIBIT E (Cont'd)  
COST RECOVERY SETTLEMENTS/JUDGEMENTS

REGION	NPL	SITE/STATE	FISCAL YEAR OF SETTLEMENT/ JUDGEMENT	AMOUNT RECOVERED (\$)	REMOVAL ACTION (S) TAKEN
7	*	Aidex, IA Denny Farm, MO	1983 1984	12,967 155,000 (4)	*
8		Arlington, WY	1983	6,545	*
9		General Disposal, CA Nickel Solution, CA	1981 1984	30,000 199,500	* *
10	*	American Surplus, WA	1984	<u>138,400</u>	*
TOTAL COST RECOVERIES				<u>\$6,641,196</u>	
TOTAL AMOUNT COLLECTED				<u>6,106,149</u>	
AMOUNT OF SETTLEMENTS OUTSTANDING				<u>535,047</u>	

(1) Agreement for \$635,800; \$605,753 paid as of September 30, 1984.

(2) Agreement for \$15,000; \$10,000 paid as of September 30, 1984.

(3) Agreement reached but uncollected as of September 30, 1984.

(4) Court judgement but defendants have appealed decision; therefore, payment had not been collected as of September 30, 1984.

EXHIBIT F  
COST RECOVERY CASES FILED BY DOJ

REGION	NPL	SITE/STATE	APPROXIMATE \$ VALUE OF SITES	REMOVAL ACTION(S) TAKEN
1	*	Solvents Recovery, CT	25,000	
	*	Baird & McQuire, MA	1,000,000	*
	*	New Bedford, MA	971,000	*
		Mottolo, NH	550,000	*
	*	Ottati & Goss, NH	2,100,000	*
2	*	Goose Farm, NJ	2,500,000	*
	*	Prices Landfill, NJ	7,600,000	
	*	Syncon Resins, NJ	100,000	
		Berncolors, NY	550,000	*
	*	Love Canal, NY	20,000,000	*
	*	York Oil, NY	893,000	*
	*	Pine Valley Golf Club, NJ	35,000	*
3	*	Tybouts, DE	200,000	
		Northeast, MD	1,000,000	*
	*	ABM Wade, PA	4,800,000	*
	*	Brodhead Creek, PA	684,000	*
	*	Bruin Lagoon, PA	1,222,400	*
	*	Drake, PA	950,000	*
		Glenside Chloride, PA	14,500	*
	*	Lehigh Electric, PA	1,500,000	
		Roadside Dumping, PA	100,000	
		Turco, PA	286,000	*
	*	Tyson's Disposal, PA	869,800	*
	*	Big John's Salvage, WV	819,000	*
		Holder Corp., WV	170,000	*
	Manila Creek, WV	260,000	*	
4	*	Taylor Road, FL	80,000	
		Luminous Processes, GA	760,000	
		Lenoir, NC	113,000	*
		Keith Farm Pond, KY	198,600	*

EXHIBIT F (Cont'd)  
COST RECOVERY CASES FILED BY DOJ

REGION	NPL	SITE/STATE	APPROXIMATE \$ VALUE OF SITES	REMOVAL ACTION(S) TAKEN
	*	Roadside PCB's, NC	2,570,000	
	*	Bluff Road, SC	1,156,200	
	*	Carolawn, SC	550,500	*
		Dreyfus Street, SC	342,100	*
5	*	A & F Greenup, IL	1,143,700	*
		A & F Olney, IL	99,000	
		Environmental Dynamics, IL	152,200	
		Hixon Plating, IL	43,000	*
	*	OMC, IL	2,000,000	
	*	Enviro-Chem, IN	1,000,000	*
	*	Midco I & II, IN	1,391,900	*
	*	Seymour, IN	5,500,000	*
	*	Berlin & Farro, MI	1,100,000	*
	*	Chem Central, MI	240,000	
	*	Liquid Disposal, MI	2,300,000	*
	*	Northernaire, MI	163,700	*
	*	Peerless Plating, MI	130,000	*
	*	Velsicol, MI (2 cases)	1,000,000	
	*	Verona Wellfield, MI	27,000	*
		Isanti, MN (2 cases)	889,600	*
	*	Reilly Tar, MN	940,300	
		Anaconda Road, OH	40,000	*
	*	Chem-Dyne, OH	4,000,000	*
		Greiner's Lagoon, OH	155,400	*
	*	Laskin/Poplar, OH	2,065,900	*
		T. P. Long, OH	37,000	*

EXHIBIT F (Cont'd)  
COST RECOVERY CASES FILED BY DOJ

REGION	NPL	SITE/STATE	APPROXIMATE \$ VALUE OF SITES	REMOVAL ACTION(S) TAKEN
6	*	Vertac, AR	695,400	
	*	Petro Processors, LA	600,000	
		Argent, NM	40,000	*
	*	Homestake Mining, NM	27,000	
	*	Hardage/Criner, OK	223,000	
	*	Crystal Chemical, TX	4,000,000	*
	*	French Limited, TX	969,100	*
	*	Triangle, TX	400,000	*
7		Horse Arenas, MO	1,000,000	*
		Denny Farm, MO	447,500	
9	*	Mountain View/Globe, AZ	7,000,000	*
		Occidental, CA	10,000,000	
		General Disposal, CA	1,606,200	*
		Nickel Solution, CA	209,800	*
	*	Stringfellow, CA	9,000,000	*
10	*	Pacific Recycling, ID	312,600	*
	*	Western Processing, WA	1,500,000	*
	*	American Surplus, WA	384,600	*
		Nortran, WA	<u>8,500</u>	
APPROXIMATE TOTAL DOLLAR VALUE:			<u>\$117,688,300</u>	

TOTAL SECTION 107 ACTIONS FILED: 77