



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029

37-23527-016  
030-28619

MAR 14 2007

**Notification of Potential Liability ("General Notice"),  
Notification of Decision Not to Use Special Notice Procedures and  
Required Submission of Information Pursuant to CERCLA § 104(e)**

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Isolite Corporation  
4150-A Berwick Rd.  
Bloomsburg, PA 17815

**Attn: William E. Lynch, Chief Executive Officer**

**Re: Safety Light Corporation, Columbia County, Pennsylvania**

RECEIVED  
REGION I  
2007 MAR 19 PM 1:14

Dear Mr. Lynch:

This letter notifies you that Isolite Corporation ("Isolite" or "you/your company") may incur, and/or may have incurred, liability under Section 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9607(a), with respect to the Safety Light Corporation Site ("Site") located in Bloomsburg, Pennsylvania. This letter also notifies you of potential response activities at the Site, which you may be asked to perform or pay for at a later date if the United States Environmental Protection Agency ("EPA") performs them.

Under CERCLA, commonly known as the federal "Superfund" law, the EPA is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment – that is, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. EPA has documented that such a release has occurred at the Site. EPA has spent, or is considering spending, public funds to investigate and control releases of hazardous substances or potential releases of hazardous substances at the Site. Based on information presently available to EPA, EPA has determined that Isolite Corporation may be responsible under CERCLA for cleanup of the Site or costs EPA has incurred in cleaning up the Site.

As you are aware, activities at the Site have varied over time and involved the use of a number of different radionuclides and other hazardous substances. In 1948, the United States Radium Corporation's radium operations were relocated from Brooklyn, New York to the Site. In 1980, the former U.S. Radium Corporation was restructured into six companies. As a result of this restructuring, the name of the former U.S. Radium was changed to Safety Light Corporation, and the following five corporations were created with assets from the former U.S. Radium Corporation: USR Industries, Inc., USR Chemicals, Inc., USR Lighting, Inc., USR Metals, Inc., and U.S. Natural Resources, Inc. The Site has been investigated over the years and has documented radiological and chemical contamination in soil, groundwater, buildings, and sediments.

### **EXPLANATION OF POTENTIAL LIABILITY**

Under CERCLA, specifically Sections 106(a) and 107(a), potentially responsible parties ("PRPs") may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be responsible for costs incurred by EPA in cleaning up the Site, unless the PRP can show divisibility or any of the other statutory defenses. PRPs include current and former owners and operators of a site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

Based on the information collected, EPA believes that Isolite Corporation may be liable under Section 107(a) of CERCLA with respect to the Safety Light Corporation Site, as an arranger for treatment and/or disposal of hazardous substances, including radionuclides, at the Site.

### **SITE RESPONSE ACTIVITIES**

To date, EPA has taken several response actions at the Site under the authority of the Superfund Program. Below is a brief description of the actions taken at the Site.

- A Preliminary Assessment ("PA") and Site Investigation ("SI") in order to gain a basic understanding of any risks posed to human health and/or the environment by releases or threatened releases from the Site.
- A Removal Action, conducted to reduce the immediate threat to human health and the environment from the Silo waste.

EPA is conducting the Remedial Investigation at the Site to identify the Site characteristics and to define the nature and extent of soil, air, surface water, and groundwater contamination at the Site and the risks posed by the Site.

EPA may expend additional funds for response activities at the Site under the authority of CERCLA and other laws.

### **DECISION NOT TO USE SPECIAL NOTICE**

This letter notifies you that EPA has decided not to use the settlement procedures set forth in Section 122 of CERCLA, 42 U.S.C. § 9622, for the completion of the Remedial Investigation/Feasibility Study at the above-referenced Site. EPA has determined that use of settlement procedures set forth in Section 122 of CERCLA would not be in the public interest at this time, would not facilitate an agreement between EPA and Isolite Corporation, and would not expedite the response actions required to complete the RI/FS for the Safety Light Corporation Site.

Section 122(a) of CERCLA, 42 U.S.C. § 9622(a), directs EPA to employ the settlement procedures outlined therein "[w]henver practicable and in the public interest" to "facilitate agreements . . . that are in the public interest and consistent with the National Contingency Plan in order to expedite effective remedial actions and minimize litigation." Section 122(e) of

CERCLA, 42 U.S.C. § 9622(e), prescribes a discretionary "special notice" moratorium for on-site activities during which EPA may negotiate settlements with responsible parties if the Agency determines that "a period of negotiation . . . would facilitate an agreement with potentially responsible parties for taking response action . . . and would expedite remedial action." Finally, Section 122(a) of CERCLA, 42 U.S.C. § 9622(a), requires that EPA notify potentially responsible parties ("PRPs") in writing if the Agency determines that the settlement procedures outlined in the section will not be used.

The preceding explanation of special notice and the negotiation moratorium procedure is for your general information about the Superfund process. It does not require any specific action on your part at this time.

### **REQUIRED SUBMISSION OF INFORMATION**

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. Section 9604(e), EPA has the authority to require Isolite Corporation to furnish all information and documents in your possession, custody or control, or in the possession, custody or control of any of your employees or agents, which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), and pollutants and/or contaminants as defined by Section 101(33), 42 U.S.C. Section 9601(33), which were transported to, stored, treated, or disposed of at the above-referenced Site.

Section 104 of CERCLA authorizes EPA to pursue penalties for failure to comply with that section or for failure to respond adequately to required submissions of information. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. Section 1001. The information you provide may be used by EPA in administrative, civil, or criminal proceedings.

Instructions for responding to this required submission of information ("Information Request") are provided below.

### **INSTRUCTIONS**

1. You may be entitled to assert a claim of business confidentiality covering any part or all of the information you submit. If you desire to assert a claim of business confidentiality, please see Enclosure 1, *Business Confidentiality Claims/Disclosure to EPA Contractors & Grantees of Your Response*. You must clearly mark such information by either stamping or using any other form of notice that such information is trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.
2. Please provide a separate, detailed narrative response to each question, and to each subpart of a question, set forth in this Information Request. If you fail to provide a detailed response, EPA may deem your response to be insufficient and thus a failure to comply with this Information Request, which may subject you to penalties.

3. Precede each response with the number of the question or subpart of the question to which it corresponds. For each document or group of documents produced in response to this Information Request, indicate by the number of the specific question(s) or subpart of the question(s) to which it responds.
4. Should you find at any time after submission of your response that any portion of the submitted information is false, misrepresents the truth or is incomplete, you must notify EPA of this fact and provide EPA with a corrected written response.
5. Any terms that are used in this Information Request and/or its Enclosures that are defined in CERCLA, shall have the meaning set forth in CERCLA. Definitions of several such terms are set forth in Enclosure 2, *Definitions*, for your convenience. Also, several additional terms not defined in CERCLA are defined in Enclosure 2. Those terms shall have the meaning set forth in Enclosure 2 any time such terms are used in this Information Request and/or its Enclosures.

Site records obtained from the Safety Light Corporation suggest that a close business arrangement existed between Safety Light Corporation and Isolite Corporation. Copies of Isolite price quotes and invoices have been provided to you, which may assist you in your research. Based on these documents, EPA believes that Isolite Corporation may have brokered, transported, and/or otherwise arranged for the shipment of materials containing hazardous substances, including tritium, to the Site for treatment, reclamation and/or disposal. Please provide the following information:

### **INFORMATION REQUESTED**

Please answer the following questions in accordance with the Instructions set forth above.

1. Did Isolite ever transport or arrange for the transport of hazardous substances, including radionuclides and/or radioactive waste or other waste for storage, treatment, recycling, reclamation or disposal at the Site?
2. Did Isolite ever contract or arrange with any other party for the storage, treatment, recycling, reclamation or disposal of hazardous substances and/or radioactive waste or any other waste at the Site?
3. If you answered "yes" to Question 1 or Question 2, above, please provide the following information:
  - a. Identify all persons and entities with or for whom Isolite transported, brokered, or otherwise arranged for the shipment of hazardous substances, radioactive waste or other wastes to the Site. Your answer should include the name, current address (or most recent address available), telephone number, and contact person for each person or entity identified.
  - b. For each person or entity with or for whom Isolite transported, brokered, or otherwise arranged for the shipment of hazardous substances, radioactive waste or other wastes to the Site, provide:

1. a description of the type and quantity of hazardous substances, radioactive waste, or other waste which you transported or for which you arranged for the transport to the Site or for which you acted as a broker in order to arrange storage, treatment, recycling, reclamation or disposal at the Site.
  2. provide the time period during which you transported or brokered each person's or entity's hazardous substances, radioactive waste or other wastes.
  3. the entity which received the hazardous substances, radioactive waste or other wastes, i.e., Safety Light, Isolite, U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, at the Site or elsewhere;
  4. the type of hazardous substances, radioactive waste or other wastes that were disposed/reclaimed;
  5. the amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site;
  6. the dates of the pickup/delivery of the hazardous substances, radioactive waste or other wastes;
  7. all documents, including personal and internal company documents and correspondence, regarding the type and amount of hazardous substances, radioactive waste or other wastes transported/brokered to the Site;
  8. the name, title, areas of responsibility, current (or most recent) addresses, and telephone numbers of other parties that have documentation or information pertaining to the transportation/disposal of hazardous substances, radioactive waste or other wastes at the Site.
4. Describe any permits or permit applications and any correspondence between your company and any regulatory agencies regarding the transportation and storage, treatment, recycling, reclamation or disposal of such wastes.
  5. Describe any contracts or correspondence between your company and any other company or entity, including but not limited to Safety Light, Shield Source, Inc., U. S. Radium, Lime Ridge Industries, USR Industries, USR Metals, and Metreal regarding the transportation, storage, treatment, recycling, reclamation or disposal of such hazardous substances at the Site.
  6. Provide copies of all documents (including but not limited to log books, manifests, receipts, and invoices) created or kept by you related to the collection of materials (including, but not limited to, composition and quantity of materials) from customers whose materials were taken to the Site.

All documents and information should be sent to:

Harry R. Steinmetz (3HS62)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

This required submission of information is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

If you have any questions pertaining to this information requested, please feel free to contact Harry Steinmetz at (215) 814-3161, or have your attorney contact EPA's attorney, Humane Zia, at (215) 814-3454. Technical questions can be directed to the site Remedial Project Manager, Mitch Cron, at 215-814-3286.

### **ADMINISTRATIVE RECORD**

Pursuant to CERCLA Section 113(k), 42 U.S.C. §9613(k), EPA establishes an administrative record that contains documents which form the basis for EPA's decision on the selection of each response action for a site. The administrative record will be available to the public for inspection and comment before any remedy is selected by EPA. A copy of the record is available on the internet at [www.epa.gov/arweb](http://www.epa.gov/arweb), and another copy will be located at the EPA Regional office in Philadelphia.

The factual and legal discussions contained in this letter are intended solely for notification and information purposes. They are not intended to be, and cannot be relied upon, as a final EPA position on any matter set forth herein.

Sincerely,



Karen Melvin, Associate Division Director  
Office of Enforcement  
Hazardous Site Cleanup Division

- Enclosures:
- 1: Business Confidentiality Claims/Disclosure of Your Response to EPA Contractors and Grantees
  - 2: Definitions
  - 3: List of Contractors That May Review Your Response
  - 4: Ledger Sheets from Safety Light Inc.
  - 5: PRPs Receiving Notice of Potential Liability for the Safety Light Corp. Site

cc: Larry Newcomer (PADEP, Hazardous Sites Cleanup)  
Humane Zia (3RC41)  
Mitch Cron (3HS22)  
Harry Steinmetz (3HS62)  
Bob Prince (NRC)  
Jeff Whitehead (PADEP, Radiation Protection)

## **Enclosure 1**

### **Business Confidentiality Claims**

You may be entitled to assert a claim of business confidentiality covering any part or all of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. If a claim of business confidentiality is not asserted when the information is submitted to EPA, EPA may make this information available to the public without further notice to you. You must clearly mark such claimed information by either stamping or using any other such form of notice that such information is a trade secret, proprietary, or company confidential. To best ensure that your intent is clear, we recommend that you mark as confidential each page containing such claimed information.

### **Disclosure Of Your Response to EPA Contractors and Grantees**

EPA may contract with one or more independent contracting firms (See Enclosure 3) to review the documentation, including documents which you claim are confidential business information ("CBI"), which you submit in response to this information request, depending on available agency resources. Additionally, EPA may provide access to this information to (an) individual(s) working under (a) cooperative agreement(s) under the Senior Environmental Employment Program (SEE Enrollees). The SEE program was authorized by the Environmental Programs Assistance Act of 1984 (Pub. L. 98-313). The contractor(s) and/or SEE Enrollee(s) will be filing, organizing, analyzing and/or summarizing the information for EPA personnel. The contractors have signed a contract with EPA that contains a confidentiality clause with respect to CBI that they handle for EPA. The SEE Enrollee(s) is working under a cooperative agreement that contains a provision concerning the treatment and safeguarding of CBI. The individual SEE enrollee has also signed a confidentiality agreement regarding treatment of CBI. Pursuant to CERCLA, 42 U.S.C. Section 9604(e)(7) and EPA's regulations at 40 C.F.R. Section 2.310(h), EPA may share such CBI with EPA's authorized representatives which include contractors and cooperators under the Environmental Programs Assistance Act of 1984. (See 58 Fed. Reg. 7187 (1993)). If you have any objection to disclosure by EPA of documents which you claim are CBI to any or all of the entities listed in Enclosure 3, you must notify EPA in writing at the time you submit such documents.

## Enclosure 2

### Definitions

1. The term "arrangement" shall mean every separate contract or other agreement or understanding between two or more persons, whether written or oral.
2. The term "documents" shall mean writings, photographs, sound or magnetic records, drawings, or other similar things by which information has been preserved and also includes information preserved in a form which must be translated or deciphered by machine in order to be intelligible to humans. Examples of documents include, but are not limited to, electronic mail and other forms of computer communication, drafts, correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, summaries, pamphlets, books, invoices, checks, bills of lading, weight receipts, toll receipts, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, interoffice and intra-office communications, notations of any conversations (including, without limitation, telephone calls, meetings, and other communications such as e-mail), bulletins, printed matter, computer printouts, invoices, worksheets, graphic or oral records or representations of any kind (including, without limitation, charts, graphs, microfiche, microfilm, videotapes, recordings and motion pictures), electronic, mechanical, magnetic or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings and computer memories), minutes of meetings, memoranda, notes, calendar or daily entries, agendas, notices, announcements, maps, manuals, brochures, reports of scientific study or investigation, schedules, price lists, data, sample analyses, and laboratory reports.
3. The term "hazardous substance" means (a) any substance designated pursuant to section 1321(b)(2)(A) of Title 33 of the U.S. Code, (b) any element, compound, mixture, solution, or substance designated pursuant to section 9602 of CERCLA, (c) any hazardous waste having the characteristics identified under or listed pursuant to section 3001 of the Solid Waste Disposal Act (42 U.S.C. Section 6921) (but not including any waste the regulation of which under the Solid Waste Disposal Act (42 U.S.C. Section 6901 et seq.) has been suspended by Act of Congress), (d) any toxic pollutant listed under section 1317(a) of Title 33, (e) any hazardous air pollutant listed under section 112 of the Clean Air Act (42 U.S.C. Section 7412), and (f) any imminently hazardous chemical substance or mixture with respect to which the Administrator has taken action pursuant to section 2606 of Title 15 of the U.S. Code. The term does not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under subparagraphs (a) through (f) of this paragraph, and the term does not include natural gas, natural gas liquids, liquefied natural gas, or synthetic gas usable for fuel (or mixtures of natural gas and such synthetic gas).
4. The term "pollutant or contaminant" shall include, but not be limited to, any element, substance, compound, or mixture, including disease-causing agents, which after release into the environment and upon exposure, ingestion, inhalation, or assimilation into any organism, either directly from the environment or indirectly by ingestion through food chains, will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including

malfunctions in reproduction) or physical deformations in such organisms or their offspring, except that the term "pollutant or contaminant" shall not include petroleum, including crude oil or any fraction thereof which is not otherwise specifically listed or designated as a hazardous substance under CERCLA, and shall not include natural gas, liquefied natural gas, or synthetic gas of pipeline quality (or mixtures of natural gas and such synthetic gas).

5. The term "release" means any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant), but excludes (a) any release which results in exposure to persons solely within a workplace, with respect to a claim which such persons may assert against the employer of such persons, (b) emissions from the engine exhaust of a motor vehicle, rolling stock, aircraft, vessel, or pipeline pumping station engine, (c) release of source, byproduct, or special nuclear material from a nuclear incident, as those terms are defined in the Atomic Energy Act of 1954 (42 U.S.C. Section 2011 et seq.), if such release is subject to requirements with respect to financial protection established by the Nuclear Regulatory Commission under section 170 of such Act (42 U.S.C. Section 2210), or, for the purposes of section 9604 of CERCLA or any other response action, any release of source byproduct, or special nuclear material from any processing site designated under sections 7912(a)(1) or 7942(a) of CERCLA, and (d) the normal application of fertilizer.
6. The term "waste" or "wastes" shall mean and include any discarded materials including, but not limited to, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, pollutants or contaminants, and discarded or spilled chemicals, whether solid, liquid, or sludge.
7. The term "you" when referring to an incorporated entity shall mean and include the incorporated entity and its agents and representatives, including, but not limited to, persons directly authorized to transact business on the entity's behalf such as officers, directors, or partners with which the entity is affiliated, employees, accountants, engineers, or other persons who conduct business on the entity's behalf, as well as affiliated entities, including, but not limited to, partnerships, limited liability companies, divisions, subsidiaries, holding companies.

## **Enclosure 5**

### **PRPs Receiving Notice of Potential Liability for the Safety Light Corporation Site**

- **USR Industries, Inc.**
- **USR Chemicals Products, Inc.**
- **USR Lighting Products, Inc.**
- **USR Metals, Inc.**
- **U.S. Natural Resources, Inc.**
- **Metreal Corporation**
- **Safety Light Corporation**

ORIGINAL  
(Red)

or other wastes at the Site.

**Not Applicable**

4. Did E. I. du Pont de Nemours and Company ever generate radioactive wastes or other wastes that were disposed of or reclaimed by U.S. Radium, Lime Ridge Industries, USR Industries, USR Metals, Metreal, Isolite at the Site?

**See Response 1**

**Our records indicate that DuPont shipped 3 tritium signs to the Isolite site in 2001 and approximately 49 tritium Signs to the Isolite site in 2002**

5. If you answered "yes" to Question 4, please address the following issues:
- a. Please provide the following information regarding all wastes and by-products produced by your company during the period 1945 to the present:

**See Response 1**

**DuPont objects to Question #5 regarding all wastes and by-products produced during the period from 1945 to the present because it is overly broad and burdensome for a company of this size and length of operations. However, we checked our company wide network for purchase and disposal of radioactive waste. In addition, we specifically checked our radioactive materials records at the Chambers Works facility because the EPA had supplied information indicating a connection with the Chambers Works site. During this review we retrieved the information contained in Answer #4 and therefore have limited our response to the subparts of this question to the materials identified in response to question 4.**

- i. the nature of radioactive waste or other wastes, hazardous substances, and/or by-products used, including their chemical content, characteristics, and physical state (i.e., liquid, solid, gas, or in the form of contaminated rags, cups, containers). Provide chemical analyses and Material Safety Data Sheets ("MSDSs"). If these analyses are not available for the period 1977-1991, submit analyses for the time period closest to these dates and describe, in detail, any changes in the process(es) in which radioactive waste or other wastes were produced that would affect the chemical analyses;

**See Responses 1 and 5a**

**Self-luminous (tritium) exit signs employing several sealed borosilicate glass tubes arranged into the word, "Exit". The tubes are positioned in the parabolic channels of a backing material that also serves as a reflector. Each tube is coated on the inside with a**

5/15/04  
Red

thin layer of a phosphor and filled with tritium gas. The low energy beta particles from the tritium (half-life 12 years) strike the phosphor and cause it to glow.

See Attachment B

- ii. the annual quantity of radioactive waste or other wastes, hazardous substances, and/or by-products used or generated;

See Responses 1 and 5a

DuPont shipped 3 tritium exit signs in 2001 and approximately 49 tritium exit signs in 2002 to the Isolite site.

- iii. the process(es) in which radioactive waste or other wastes, hazardous substances, and/or by-products were used or the process(es) that generated each;

See Responses 1 and 5a

DuPont purchased the tritium exit signs. Because no electrical power source is required, the tritium exit signs were used where there is no power or the power could fail. DuPont has no other information

- iv. the types of containers used to treat, store, or dispose of radioactive waste or other wastes, hazardous substances, and/or by-products; and

See Responses 1 and 5a

DuPont shipped the tritium exit signs to Isolite for disposal. Beyond that DuPont has no other information.

- v. the method of treatment and/or disposal of the above.

See Responses 1 and 5a

DuPont shipped the tritium exit signs to Isolite for disposal. Beyond that DuPont has no other information.

- b. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons, including you, who, during the period 1945 to the present, may have:

- i. disposed of or treated radioactive or hazardous materials at the Site;

01/20/03  
7:24

**See Response 1 and 5a**

**DuPont shipped the tritium exit signs to Isolite for disposal. Beyond that DuPont has no other information.**

- ii. arranged for the disposal or treatment of radioactive or hazardous materials at the Site; and

**See Response 1 and 5a**

**Sharon Wilkinson (Under the guidance of Aaron Chen)  
Contract employee, Chambers Works  
Performed Radiation Safety Support**

**Aaron Chen  
Chambers Works Radiation Safety Officer (1997-2002)  
Responsible for site operating within specific license issued by  
Nuclear Regulatory Commission and New Jersey Department of  
Environmental Protection**

**All DuPont employees are represented by DuPont Counsel. All  
communications are to be made through Pam Meitner,  
Corporate Counsel, 302-774-8720**

- iii. arranged for the transportation of radioactive or hazardous materials to the Site (either directly or through transshipment points) for disposal or treatment.

**See Response 1 and 5a and 5b ii**

- c. If your response to the above includes the contracting of a hauler or transporter to transport and/or dispose of wastes, explain these arrangements and provide documentation confirming the nature of those transactions. Please identify:
  - i. the persons with whom you, or other such persons, made such arrangements;

**The tritium exit signs were shipped via Federal Express Ground.**

5/10/02  
10:30

See Attachment C

- ii. every date on which such arrangements took place;

See Response 1 and 5a

Approximately 49 tritium signs were sent Federal Express Ground to the Isolite site on 10/17/02. We have no information on the 3 tritium signs sent to the Isolite site in 2001.

- iii. for each transaction, the nature and quantity of material, including its chemical content, characteristics, physical state (i.e., liquid, solid), and the process for which the substance was used or the process that generated the substance;

See Response 1 and 5a

Self-luminous (tritium) exit signs employing several sealed borosilicate glass tubes arranged into the word, "Exit". The tubes are positioned in the parabolic channels of a backing material that also serves as a reflector. Each tube is coated on the inside with a thin layer of a phosphor and filled with tritium gas. The low energy beta particles from the tritium (half-life 12 years) strike the phosphor and cause it to glow.

DuPont purchased the approximately 52 tritium exit signs. DuPont has no other information

- iv. the precise locations at which each material was disposed or treated at the Site;

See Response 1 and 5a

DuPont shipped the tritium exit signs to the Isolite Corporation. Beyond that DuPont has no other information.

- v. the persons who selected the Site as the place at which materials were disposed or treated;

See Response 1 and 5a

Sharon Wilkinson(Under the guidance of Aaron Chen)  
Contract Employee, Chambers Works Site

7-11-02  
10:24  
D-2-A

**Aaron Chen  
Chambers Works Radiation Safety Officer (1997-2002)**

**All DuPont employees are represented by DuPont Counsel. All communications are to be made through Pam Meitner, Corporate Counsel, 302-774-8720**

vi. the final disposition of each material involved in such transactions;

**The approximately 52 tritium exit signs were shipped to the Isolite site.**

vii. the names of employees, officers, owners, and agents for each transporter.

**The signs were transported to the Isolite site via Federal Express Ground. After a review of its records, DuPont has not identified any other information responsive to this question.**

d. For each and every instance in which you/your company arranged for disposal or treatment of material at the Site, identify:

i. the quantity (number of loads, gallons, drums) of materials that were used, treated, transported, disposed, or otherwise handled by you; and

**See Response 1 and 5a**

**3 tritium Signs were shipped to the Isolite Corporation in 2001 and approximately 49 Tritium Signs were shipped to the Isolite Corporation in 2002**

ii. any billing information and documents (invoices, trip tickets, manifests) in your possession regarding arrangements made with your company to generate, treat, store, transport, or dispose of materials at the Site.

**See Response 1 and 5a**

**DuPont Purchase Order 113604 (Attachment A)  
DuPont Shipping Request RMA 1353PARMA (Attachment B)  
Isolite Corporation Packaging Instructions (Attachment C)  
Isolite Corporation Quote 819PA-Q (Attachment D)**

BXPM 2229.21  
RMA 1353PARMA

SHIPPING REQUEST  
(see reverse side for additional information)

All lines required to be completed. If line does not apply mark N/A.

SHIP TO: ILC/Isolite Corporation

Attn: Health Safety Officer

8828

4150-A. Berwick rd, Bloomsburg PA 17815

Attn: Health Safety Officer Telephone: 800 888 5483

Requested by: Sharon Wilkinson Location: Bldg. IL Rm. 4127

Telephone #: 540 3766 Cost Code: 110901-001769

Product Name: Tritium Exit Sign Size of Sample: \_\_\_\_\_

Chemical Name: \_\_\_\_\_ Number of Sample: \_\_\_\_\_

OVERSEAS SHIPMENT/Customs Value \$ \_\_\_\_\_ Description \_\_\_\_\_

111 Chemical \_\_\_\_\_ Non-Chemical \_\_\_\_\_

12) Is the sample a DuPont commercial product? No  Yes \_\_\_\_\_

13) CHARACTERISTICS: DOT/IATA REQUIRED INFORMATION

SOLID \_\_\_\_\_ LIQUID \_\_\_\_\_ GAS \_\_\_\_\_

FLAMMABLE: No  Yes \_\_\_\_\_ if Yes, Flash Point <73°F \_\_\_\_\_ 73°F to 141°F \_\_\_\_\_ >141°F \_\_\_\_\_

Boiling Point <95°F \_\_\_\_\_ >95°F \_\_\_\_\_

What component makes it flammable: \_\_\_\_\_

POISONOUS: Not known to be  Yes \_\_\_\_\_ if Yes, LD50 <5 \_\_\_\_\_ (very), 5 to 50 \_\_\_\_\_ (moderate), >50 \_\_\_\_\_ (mild)

What component makes it poisonous? \_\_\_\_\_

CORROSIVE: No  Yes \_\_\_\_\_ if Yes, Will it burn your skin in 3 min \_\_\_\_\_ 1hr \_\_\_\_\_ 4 hrs \_\_\_\_\_

Will it corrode steel 1/8" in a year? No \_\_\_\_\_ Yes \_\_\_\_\_

What component makes it corrosive? \_\_\_\_\_

OXIDIZER  RADIOACTIVE  EXPLOSIVE \_\_\_\_\_ OTHER \_\_\_\_\_

14) Are ALL Components in the sample TSCA listed? Yes \_\_\_\_\_ No \_\_\_\_\_ if No, check appropriate box below.

See TSCA listing certification form: [ ]

FDA Guidelines apply: [ ]

Naturally occurring material, exempt from TSCA: [ ]

ZORAX TM, except from TSCA: [ ]

15) Desired delivery date: 10/17/02

16) I certify that the above information is correct to the best of my knowledge.

Signed Sharon Wilkinson Date 10/17/02

FOR SHIPPING USE ONLY

Ship VIA Fed Ex Grad RO \_\_\_\_\_ Marine Pollutant \_\_\_\_\_

Shipping Name Radioactive Material, Excepted Package - Instruments or Article

Hazard Class 7 ID number 2911 Packing Group \_\_\_\_\_ Packing Inst. \_\_\_\_\_

Markings: \_\_\_\_\_

LABELS: Flammable Gas \_\_\_\_\_ Flammable Liquid \_\_\_\_\_ Flammable Solid \_\_\_\_\_ Non-Flammable Gas \_\_\_\_\_

Poison \_\_\_\_\_ Poison Gas \_\_\_\_\_ Oxidizer \_\_\_\_\_ Corrosive \_\_\_\_\_ Keep away from Food \_\_\_\_\_ Class 9 \_\_\_\_\_

*Sharon W*



**PACKAGING INSTRUCTIONS**  
FOR THE RETURN OF SELF-LUMINOUS EXIT SIGNS

- Obtain RMA# (Return Merchandise Authorization #) from Isolite. Contact Bill Rowan at 800-888-6483

**\*THE RMA# MUST BE VISIBLE ON THE SHIPPING LABEL OR YOUR SHIPMENT WILL BE REFUSED**

- Place each sign in the ISOLITE carton your replacement signs arrived in OR Pack signs in a sturdy cardboard carton. Use filler materials to assure a tight, rattle-free fit. Tape seal flaps and seams.
- Place this package into a second sturdy cardboard carton and include the following text:

**'This package conforms to the conditions and limitations specified in 49 CFR 173.424 for radioactive material, excepted package-instruments or articles, UN2810'**

D O T Regulations 49CFR173.422(a)(2) require that you enclose the above statement in each carton you ship. If you are shipping only one carton, simply enclose this sheet

- Use filler materials to assure a tight fit
- Tape seal flaps and seams
- Include the RMA #\* and your return address on the shipping label.
- Send to our licensed facility.

SLC/Isolite Corporation  
Attn: Health Safety Officer  
4150-A Old Berwick Road  
Bloomsburg, PA 17815

 DO NOT SHIP USPS	 800-742-5877	 800-762-3725
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NOTE: Keep total content of each carton shipped < 100 Curies.  
See label on each sign for Cune Amount.





# QUOTE

# 819PA-Q

07/26/2002

Quote Date: 7/26/2002

Quote Expires: 10/1/2002

DuPont - Chambers Works

PROJECT Expired Sign Return

Deepwater, NJ 08023  
USA

CONTACT: Sharon Wilkinson  
PHONE 856-540-3766  
FAX 856-540-4077

TERMS NET 30 DAYS  
FOB FACTORY  
ESD:

PRODUCT NO	DESCRIPTION	QTY	UNIT PRICE	PRICE
RETURN	Return of Expired Tritium Exits	50	\$75.00	\$3,750.00
			<b>QUOTE TOTAL:</b>	<b>\$3,750.00</b>

Comments:

tion Before Writing Requisition

# BUY DU PONT PRODUCTS

CONSIDER MINORITY VENDORS (TEMPO)

## E. I. du Pont de Nemours and Company



PURCHASE ORDER	
LDH# 113604	
PURCHASE ORDER NO.	ALT. NO.
RELEASE NUMBER	

E. NO. TAX CODE DIRECT ALL INQUIRIES

ISSUED BY \_\_\_\_\_

TYPE OF ORDER

PAGE OF

TERMS OF PAYMENT

CASH  SHIP BY

REQUIRED DELIVERY DATE

PROMISED DELIVERY DATE

PREPAID  OTHER BILLING  COLLECT

\* IF COLLECT, Add Freight Bill To  
**DU PONT FMIS**  
BOX 998A  
WILMINGTON, DE 19880

### INSTRUCTIONS TO VENDOR

- PLEASE ENTER OUR ORDER AS SPECIFIED BELOW SUBJECT TO TERMS AND CONDITIONS LISTED ON BOTH THE FRONT AND REVERSE SIDE OF THIS PURCHASE ORDER. ANY ADDITIONAL OR DIFFERENT TERMS BY SELLER'S FORMS ARE MATERIAL ALTERATIONS AND HEREBY PROHIBITED.
- IF PRICE, TERMS, REQUIRED SHIPPING DATE OR OTHER CONDITIONS AND INSTRUCTIONS ARE NOT ACCEPTABLE IMMEDIATELY ADVISE INDIVIDUAL INDICATED BY RED ARROW ABOVE.
  - FURNISH COMPLETE SHIPPING INFORMATION AND INCLUDE 2 COPIES OF PACKING LIST WITH EACH SHIPMENT. EACH PURCHASE ORDER NUMBER ON EACH PACKAGE, PACKING LIST, BILL OF LADING, INVOICE AND ALL CORRESPONDENCE.
  - MAIL YOUR INVOICE TO ADDRESS SPECIFIED BELOW.

Mail One Copy Of Your Invoice To:  
E. I. du Pont de Nemours and Company  
ATTN: ACCOUNTS PAYABLE SECTION  
MISC. STORES - CHAMBERS WORKS  
DEEPPWATER, NJ 08023

TITLE OF GOODS

Ship To, Show Qty & Units

Freight Terms

VENDOR CODE

PRICE CODE

*Aselite Corporation*  
*31 Waterloo Ave.*  
*Berwyn, PA 19312*  
E. I. du Pont de Nemours and Company  
CHAMBERS WORKS  
JACKSON LABORATORY  
DEEPPWATER, NJ 08023

4. DO NOT INSURE U.P.S. OR PARCEL POST. DO NOT DECLARE AIR EXPRESS AND AIR FREIGHT IN EXCESS OF \$5000. IF LOWER CHARGES RESULT TO DU PONT, DECLARED VALUE SHALL NOT EXCEED LOWER AMOUNT IN APPLICABLE CARRIER.

SHIP VIA *UPS Ground Delivery*

ITEM	QUANTITY	UNIT	DESCRIPTION (SHOW OR ATTACH COMPLETE SPECIFICATIONS)	PRICE
			<i>For disposal of Tritium Exit Sign (approx. 50)</i>	
			<i>NTE</i>	<i>3,750.00</i>
			<i>Bx/m # 221235</i>	

DO NOT WRITE BEYOND THIS LINE

TAXABLE  NON-TAXABLE

MSDS REVIEWED

CONFIRMING TO:

EQUIPPED BY: *Sharon Wilkinson* EXTENSION: *3766* BY: \_\_\_\_\_ DATE: \_\_\_\_\_ AUTH. LEVEL: \_\_\_\_\_ DATE RECEIVED: \_\_\_\_\_ ESTIMATED WEIGHT: \_\_\_\_\_ ESTIMATED COST: \_\_\_\_\_

ITEM NO.	GENERAL LEDGER ACCOUNT/SUB ACCOUNTS	DETAIL ACCOUNTING			AMOUNT	DELIVERY ROOM # 7231	ROOM
		WORK ORDER	ORDER NUMBER	CRAFT			
	<i>7003-110901-001-769</i>						

NEAREST SELLER SELECTED:  LOWEST PRICE  BEST QUALITY  ONEY KNOWN SOURCE  CONTRACTUAL

ORDER APPROVED BY: \_\_\_\_\_ ORDER EXECUTED BY: \_\_\_\_\_