Backman, Blumel & Reed

- ATTORNEYS AT LAW-

STEPHEN F. BACKMAN JOSEPH A. BLUMEL, III JAMES E. REED MAY 2 8 1993

900 NORTHTOWN OFFICE BUILDING 4407 N. DIVISION OFFICE BUILDING SPOKANE, WASHINGTON 99207-1696 (509) 487-1651 FAX (509) 483-5016

May 25, 1993

Mr. Michael A. Hibbler Regional Solid Waste Coordinator Solid and Hazardous Waste Section Eastern Regional Office N. 4601 Monroe, Suite 100 Spokane, WA 99205-1295

Re: Marshall Landfill Site

Dear Mr. Hibbler:

This letter is in response to your April 12, 1993, Notice of Potential Liability. In that notice you requested information that my clients may have regarding other potentially liable parties. I regret the delay in responding, but my clients' records are incomplete. I have been trying to get information from the Spokane County Utilities Department, but with limited success. The information I have indicates that the County Utilities Department and the County Health Department directed the disposal of waste to the Marshall Landfill and they may have records regarding the waste. When I receive this information, I will forward it to you.

In the meantime, I have enclosed a preliminary list of others who may be liable. The list includes, where available, the name and address of the generator, the transporter, the amount and type of waste deposited, and the approximate date of disposal.

In addition to the parties listed on the enclosed list, I believe that Spokane County may also be liable for approving and directing the disposal of the above waste in the Marshall Landfill. I will keep you informed regarding Spokane County's role and other potentially liable parties.

Very truly yours,

BACKMAN, BLUMEL & REED

JAMES E. REED

JER/cp

Enclosure cc: Glenn and Helen Gillson Marshall Landfill, Inc. Kaiser Aluminum - Trentwood Rolling Mill E. 15000 Euclid, Spokane, Washington Deposited approximately 38,000 gallons of waste oil (97% water) Transporter - Gober & Son, E. 11215 Trent, Spokane, Washington Approved for disposal by Spokane County Health District (SCHD) January 23, 1979

United Paint & Coatings E. 1130 Sprague, Spokane, Washington Deposited approximately 1,100 gallons of paint Approved for disposal by SCHD November 12, 1980

Industrial Burner Sales Deposited approximately 18,000 gallons of water and HCI used to clean burners at Fairchild AFB Approved for disposal by SCHD February 6, 1981

Gulf Atlantic Warehouse E. 108 Jackson, Spokane, Washington Deposited approximately 150 gallons of oil, dirt and water Transporter - Appleway Septic, E. 9400 First, Spokane, Washington Approved for disposal by SCHD October 28, 1981

B.J. Carney Pole Co. Great Northwest Bldg., P.O. Box 408, Spokane, Washington Deposited approximately 15,000 cubic yards of soil contaminated by PCP Approved for disposal by SCHD November 18, 1981

Empire Bolt & Screw, Inc. E. 1501 Trent Avenue, Spokane, Washington Deposited approximately five 70 pound containers of waste metals Approved for disposal by SCHD November 30, 1981

Cummins Diesel E. 3904 Trent, Spokane, Washington

Motion Auto S. 321 Dishman-Mica Road Spokane, Washington

Clay & Gable E. 8412 Sprague, Spokane, Washington

The above three deposited approximately 2,500 gallons of spent caustic soda Transporter - Simpson Sanitation Service, E. 7812 Baldwin, Spokane, Washington Approved for disposal by SCHD December 7, 1981 National Electric Coil N. 415 Fancher Road, Spokane, Washington Deposited approximately 300 gallons of liquid waste from cleaning motor parts Transporter - Appleway Septic, E. 9400 First, Spokane, Washington Approved for disposal by SCHD June 4, 1982 Gary Farrel Deposited approximately 1,000 pounds of sulfer/sulfate fertilizer Approved for disposal by SCHD August 27, 1982 Square D S. 1801 Garfield Road, P.O. Box 367, Airway Heights, Washington Deposited approximately 100 gallons of soil contaminated with oil Approved for disposal by SCHD November 12, 1982 Protex Ind. W. 1128 Boone, Spokane, Washington Deposited approximately 20,000 gallons of contaminated water Transporter - Gene's Septic Approved for disposal by SCHD March 29, 1983 Shannon & Wilson, Inc. N. 9107 Country Homes Blvd., Spokane, Washington Deposited approximately 270 cubic yards of dirt contaminated with PCP Approved for disposal by SCHD November 18, 1983