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6 Attorneys for Plaintiff
 7 BKK WORKING GROUP, an unincorporated
 8 association, and individual members identified
 9 below

10 UNITED STATES DISTRICT COURT
 11 CENTRAL DISTRICT OF CALIFORNIA

12
 13 BKK WORKING GROUP;
 14 ANADARKO E&P ONSHORE
 15 LLC; ATLANTIC RICHFIELD
 16 COMPANY; ASHLAND INC.;
 17 BAYER CROPSCIENCE INC.;
 18 BIG HEART PET BRANDS; THE
 19 BOEING COMPANY;
 20 CALIFORNIA RESOURCES
 21 CORPORATION; CHEVRON
 22 ENVIRONMENTAL
 23 MANAGEMENT COMPANY;
 24 CHEVRON MARINE PRODUCTS
 25 LLC; CITY OF LOS ANGELES,
 26 ACTING BY AND THROUGH
 27 THE LOS ANGELES
 28 DEPARTMENT OF WATER AND
 POWER; CONOCOPHILLIPS
 COMPANY; CROSBY &
 OVERTON, INC.; THE DOW
 CHEMICAL COMPANY;
 DUCOMMUN
 AEROSTRUCTURES, INC.;
 ESSEX CHEMICAL
 CORPORATION; EXXON MOBIL
 CORPORATION; GEMINI
 INDUSTRIES, INC.; GENERAL
 DYNAMICS CORPORATION;
 GENERAL LATEX AND

Case No. 2:18-cv-5810-MWF-PLA

**[FILED PURSUANT TO
 PARAGRAPH A OF APRIL 10,
 2024 ORDER, ECF NO. 81]**

**SIXTH AMENDED
 COMPLAINT FOR:**

1. CERCLA: CONTRIBUTION
[42 U.S.C. § 9613(f)]
2. CERCLA: COST RECOVERY
[42 U.S.C. § 9607(a)]
3. CERCLA: SUBROGATION
[42 U.S.C. § 9612(c)(2)]
4. CERCLA: DECLARATORY
RELIEF
[42 U.S.C. § 9613(g)]
5. HSAA: CONTRIBUTION
[HEALTH AND SAFETY CODE
§§ 78000, ET SEQ.]
6. EQUITABLE
INDEMNIFICATION
7. EQUITABLE CONTRIBUTION
8. COMMON LAW
SUBROGATION
9. DECLARATORY RELIEF
[CAL. CIV. PROC. CODE §1060]

1 CHEMICAL CORPORATION;
2 HEWLETT-PACKARD
3 COMPANY; AMERICAN
4 HONDA MOTOR CO., INC.;
5 HUNTINGTON BEACH
6 COMPANY; LOCKHEED
7 MARTIN CORPORATION;
8 MARS, INC. (FORMERLY
9 KNOWN AS KAL KAN FOODS
10 INC.); MONTROSE CHEMICAL
11 CORP. OF CALIFORNIA;
12 MORTELL COMPANY;
13 MORTON INTERNATIONAL,
14 INC.; NATIONAL STEEL AND
15 SHIPBUILDING COMPANY;
16 NORTHROP GRUMMAN
17 SYSTEMS CORPORATION; OXY
18 USA INC.; QUEMETCO, INC.;
19 ROCKWELL AUTOMATION,
20 INC.; ROHM & HAAS
21 COMPANY; ROHR, INC.; SAN
22 DIEGO GAS & ELECTRIC
23 COMPANY; SMITH
24 INTERNATIONAL, INC.;
25 SOUTHERN CALIFORNIA
26 EDISON COMPANY;
27 SOUTHERN CALIFORNIA GAS
28 COMPANY; STAUFFER
MANAGEMENT COMPANY
LLC; THE PROCTER &
GAMBLE MANUFACTURING
COMPANY; THUMS LONG
BEACH COMPANY; UNION
CARBIDE CORPORATION;
UNION PACIFIC RAILROAD
(FORMERLY KNOWN AS
SOUTHERN PACIFIC
TRANSPORTATION
COMPANY); UNITED STATES
STEEL CORPORATION; RTX
CORPORATION; UNIVAR
SOLUTIONS USA LLC;
AMERON INTERNATIONAL
CORPORATION; AND XEROX
CORPORATION,

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Plaintiffs,

vs.

1700 SANTA FE LTD; A & H
PLATING INC.; A & Z DECASING
CO.; A. C. BARREL & DRUM; A. D.
SERVICE PUBLICATIONS; A. J.
DAW PRINTING INK CORP; A-
BEST ASSEMBLY &
DISTRIBUTION WAREHOUSE,
INC.; ACCENT GENERAL;
ACCURATE PLATING CO.; ACE
PLATING CO.; ACTION
COMPUTER PRODUCTS INC.;
ADVANCE GALVANIZING CO.;
ADVANCE GEAR & MACHINE
CORP.; ADVANCE PIPE
PRODUCTS; AERODYNAMIC
PLATING CO.; AETNA METALS
CO.; AIRSTREAM OF CA; AJAX
HARDWARE CORP.; ALBERT VAN
LUIT & CO.; ALCO-GRAVURE
INC.; ALL VALLEY PLATING CO.
INC.; ALLESANDRO AUTOMATIC
INC.; ALLIED CLEANING
SPECIALISTS INC.; ALLYN
TRANSPORTATION CO.; ALUM-A-
COAT INC.; ALUMINUM FORGE
DIVISION OF APP; ALUMTREAT
INC.; AMCO MANUFACTURING
CORP.; AMERICAN DRAWN
STEEL; AMERICAN
ENVIRONMENTAL LLC;
AMERICAN MARBLE & ONYX
INC.; AMERICAN OCEAN TILE;
AMERICAN SAFETY EQUIPMENT
CO.; AMEROIL; AMEXDRUG
CORPORATION; ANAPLEX CORP.;
ANCHOR HOCKING CORP.;
ANDERSON LITHOGRAPH;
ANODART; APEX DRUM CO.;

1 APODACA & SONS PLATING CO.;
2 AQUARIUS VACUUM TRUCK
3 SERVICE; ARROW PLATING CO.;
4 ARTESIA DOOR; ARTISTIC
5 POLISHING & PLATING INC.;
6 ASBESTOS CLAIMS
7 MANAGEMENT CORPORATION;
8 ASBESTOS CLEAN-UP &
9 CONSULTANTS; ASBESTOS
10 RESIDENTIAL BLANKET
11 NUMBER; ASSOCIATED DIESEL;
12 ASSOCIATED PACIFIC;
13 ASSOCIATED PLATING CO.;
14 ASSOCIATED PLATING
15 COMPANY, INC.; ASTRO PAK
16 CORP.; ATLAS COVERALL &
17 SUPPLY; ATLAS LIGHTING CO.;
18 AUTOMOTIVE BATTERY PROD
19 CO.; AVIATION POWER SUPPLY;
20 AZUSA SALVAGE CO.; B. & B.
21 PIPE & TOOL CO.; B. & C. PLATING
22 CO.; BAKER CONSULTANTS INC.;
23 BARRON PLATING CO.; BARRY L.
24 MILLER ENGINEERING CO. INC.;
25 BAY DECKING CO. INC.; BEAR
26 PAW MINING; BELL INDUSTRIES;
27 BENNETT INDUSTRIES; BEREN
28 CORP.; BERGANDI
MANUFACTURING CO. INC.;
BERK OIL CO.; BERNS CO.; BEST
WASHINGTON UNIFORM SUPPLY;
BETTY GLASER INVESTMENT
CO.; BEYLIK DRILLING; BINGO
TRUCK STOP; BLACKFOOT-
CHEROKEE ENERGY INC.; BLISS
& LAUGHLIN STEEL CO.; BLOCK
OIL CO.; BLUE SEAL LINEN
SUPPLY; BOB MULLER AUTO;
BOB'S PLATING; BOBIL MOTOR
PRODUCTS INC.; BOCK CO.;
BONANZA ALUMINUM INC.;

1 BORTZ OIL CO.; BOSS UNIFORMS;
2 BRAYTON OIL; BREA CANYON
3 OIL CO.; BRITE SOL INC.;
4 BROGDEX CORP.; BTJ
5 CONSTRUCTION; BUCK DOES IT
6 INC.; BUDS OIL SERVICE INC.;
7 BUMPER SHOP; BUMPERLINE
8 INC.; BURBANK PLATING
9 SERVICE CORP.; BURBANK
10 UNIFIED SCHOOL DISTRICT;
11 BURKE CO.; BURTON PLATING
12 CO.; C. & W. CHEMICALS CO. INC.;
13 C. M. DODSON OIL; CADET
14 UNIFORM & LINEN SUPPLY CO.;
15 CAL BUMPER CO.; CAL CHROME;
16 CAL METALS; CALIFOIL INC.;
17 CALIFORNIA CORRUGATED IND.;
18 CALIFORNIA FINISHED METALS
19 INC.; CALIFORNIA METAL
20 ENAMELING CO.; CALIFORNIA
21 MOTOR EXPRESS; CALIFORNIA
22 SHIP BUILDING; CALIFORNIA
23 TARGET ENTERPRISES;
24 CALIFORNIA TECHNICAL
25 PLATING CORP.; CAL-MOLD INC.;
26 CALPRO CO.; CAL-WEST
27 CIRCUITS INC.; CALZONA
28 TRANSPORTATION; CANNEL &
CHAFFIN CO.; CAPRI PUMPING
SERVICE; CAPRO OIL CO.;
CARLSBERG MANAGEMENT;
CARTER PRECISION PARTS INC.;
CASCADE DIE CASTING GROUP
INC.; CASDEN CO.; CASPIAN INC.;
CAST METAL FINISHING; CBC
INDUSTRIES; CEDARGREEN
REFINING CO.; CEDKO
ELECTRONICS; CELOTEX CORP.;
CENTRAL INDUSTRIAL
ENGINEERING; CENTRAL
INSULATION CORP.; CENTRAL

1 PLANTS INC.; CENTURY PHOENIX
2 LAMINATORS INC.; CERTIFIED
3 GROCERS OF CAL.; CHACON
4 CHEMICAL CORP.; CHALLENGE
5 COOK BROS; CHAMPION POWER
6 WASH; CHARLES BRUNING CO.;
7 CHEM ARROW CORP.; CHEM
8 ETCH CORP.; CHEM WEST
9 INDUSTRIES INC.; CHEMICAL CO.;
10 CHEMICAL ENERGY; CHEMICAL
11 MACHINING CORP.; CHEMICAL
12 MILLING INTERNATIONAL;
13 CHEMOIL CORP.; CHEMOIL
14 REFINING CORP.; CHEMPLATE
15 CORP.; CHEMRON CORP.;
16 CHEMWARE; CHICK SALES
17 PLATING CORP.; CHINO VALLEY
18 GALVANIZING CO.; CHB FOODS;
19 CHROMALLOY CORPORATION;
20 CHROME CRANKSHAFT CO.;
21 CHROMIZING CO.; CIRCUIT
22 INDUSTRIES; CITY OF CARSON;
23 CITY OF RIVERSIDE; CITY OF SAN
24 DIEGO; CLAYTON
25 MANUFACTURING CO.; CLEAN
26 STEEL INC.; CLEANING
27 DYNAMICS CORP.; CLIMAX TUBE
28 CORP.; COAST CONTRACTORS;
COLLINS GENERAL
CONTRACTORS; COLUMBIA
METAL FINISHING INC.;
COLUMBINE & ASSOCIATES;
COMMERCIAL CHEMICAL CO.
INC.; COMMERCIAL CLEANING
CORP.; COMMERCIAL TRUCK
BODIES; COMPUTER
AUTOMATION; CONEJO VALLEY
UNIFIED SCHOOL DISTRICT;
CONEXX OIL; CONNECTOR
SERVICE CORP.; CONRAC CORP.;
CONROCK CO.; CONSOLIDATED

1 AUTO; CONTAINER SUPPLY CO.;
2 CONTEMPO FURNITURE;
3 CONTINENTAL CHEMICAL CORP.;
4 CONTINENTAL FOREST
5 INDUSTRIES; CONTINENTAL
6 FOREST INDUSTRIES, INC.;
7 CONTINENTAL POLYMERS INC.;
8 CONTROL CIRCUITS; CONTROL
9 PLATING CO. INC.; COOPER LA
10 CLEAR DRUM CO.; CORROSION
11 TECHNOLOGY INC.;
12 COSMOTRONICS CO.; COTO DE
13 CAZA DEVELOPMENT CORP.;
14 COVESTRO LLC; CRANE &
15 UTTERBACK INC.; CRANE-
16 HYDROAIRE DIVISION;
17 CRESCENT TRANSPORTATION;
18 CUT-OFF MANIFEST; CWOD;
19 CYCLONE EXCELSWELD CO.;
20 TORRANCE TUBING AND
21 CONDUIT COMPANY, FORMERLY
22 KNOWN AS CYPRUS TUBING &
23 CONDUIT CO.; D. E. CALTA
24 INTERNATIONAL; D. W. ELLIOTT
25 INC.; DAMSON OIL CO.; DARLING
26 INGREDIENTS; DARRELL
27 THOMPSON TANK &
28 CONSTRUCTION; DATA CIRCUITS
INC.; DAVE BECK; DAVIDSON
PANEL CO.; DAVIS WALKER CO.;
DAYTON GRANGER INC.; G.L.C.
BUILDING CORP., FORMERLY
KNOWN AS DEL AMO ENERGY;
D.I. SALVO TRUCKING; DIAL
PRECISION INC.; DIAMOND
PLASTICS; DIBBLE ELECTRONICS
INC.; DITRONICS INC.; DITTY
DRUM CO.; DOMINGUEZ
PROPERTIES; DME CO.; DOWNEY
GLASS CO. INC.; DRAFT SYSTEMS
INC.; DRILUBE CO.; DUBOIS

1 CHEMICAL CO.; DYANCO INC.;
2 DYER HE INC.; DYNA PLATE INC.;
3 DYNA SHIELD INC.; E. & M.
4 BUILDERS; EAST LOS ANGELES
5 COLLEGE; ECO PETROLEUM INC.;
6 ECOLOGY CONTROL
7 INDUSTRIES; EDMUND GREY;
8 EECO INC.; EL CASTILLO REAL
9 RESTAURANT; EL MONTE LEAD
10 SALVAGE CO. INC.; EL MONTE
11 TOOL & DIE; ELECTRA MOTORS;
12 ELECTRO ADAPTER INC.;
13 ELECTRON PLATING;
14 ELECTRONIC PLATING SERVICE
15 INC.; ELECTRONIC
16 RECLAMATION SERVICE;
17 ENERGY PRODUCTION & SALES;
18 ENGARD COATINGS CORP.;
19 ENVIRONMENTALS INC.; ESB
20 INC.; ESKIMO RADIATOR
21 MANUFACTURING CO.; ESTEE
22 BATTERY CO.; EVEREST &
23 JENNINGS CO. INC.; FAITH
24 PLATING CO.; FANSTEEL
25 PRECISION SHEET METAL; FELA
26 MANAGEMENT AG; FELA
27 PRECISION INC.; FG GROUP
28 HOLDINGS INC.; FIRST NATIONAL
FINANCE CORP.; FIX & BRAIN
VACUUM TRUCK SERVICE;
FLASK CHEMICAL; FLINTKOTE
CO.; FLYNNS PLATING CO.;
FONTANA TRUCK WASH; FORRO
PRECISION CO.; FORTIN
LAMINATING CORP.; FOUR STAR
CHEMICAL CO.; FOUR STAR
CONTAINER INC.; FOUR STAR
DISPOSAL CO.; FREEBORN
EQUIPMENT CO. INC.; FRESNO
UNIFIED SCHOOL DISTRICT;
FRONTIER COMMODORE INC.;

1 FRONTIER CONTAINER CORP.;
2 FULLERTON JOINT UNION
3 SCHOOL DISTRICT; G. R. NANCE
4 CO. INC.; G. T. BICYCLES INC.;
5 GAINEY CERAMICS; GARDENA
6 PLATING CO.; GARHAUER
7 MARINE CORP.; GARRETT
8 RESEARCH; GEL INDUSTRIES,
9 INC.; GENES PLATING &
10 SPECTRUM CO.; GEORGE
11 INDUSTRIES INC.; GERARD
12 METAL CRAFTSMEN INC.;
13 GILLESPIE FURNITURE
14 MANUFACTURING; GILMORE
15 ENVELOPE CORP.; GLASS ARTS;
16 GLEN AIR INC.; GLENDALE
17 UNIFIED SCHOOL DISTRICT;
18 GLOBE MEAT PACKING; GOLD
19 BOND BUILDING PRODUCTS;
20 GOLD PACK MEAT CO.; GOLDEN
21 WEST AIRLINES; GOLDEN WOOL
22 CO.; GOOD TABLES INC.; GPS
23 INDUSTRIES; GRAPHIC
24 RESEARCH INC.; GRAVURE WEST;
25 GREER PRODUCTS; GREFCO INC.;
26 GREGG INDUSTRIES INC.;
27 GRINDLEY MANUFACTURING
28 INC.; GROVER PRODUCTS CO.; H.
& A. PLATING CO.; H. & C.
DISPOSAL; H. H. ROBERTSON CO.;
H. KRASNE MANUFACTURING
CO. INC.; HALL HEAT TREATING
CO.; HAMILTON CONSTRUCTION
CO.; HAMPTON OIL CO.; HANKS
SERVICE STATION
MAINTENANCE INC.; HARLAND
M. BROWN & CO.; HARLYN
PRODUCTS INC.; HARPERS OF
CALIFORNIA; HARRIS TUBE INC.;
HARTLEY CO.; HARTWELL CORP.;
HEADNALL INC.; HEADS UP

1 INDUSTRIES; HERCULES OIL CO.;
2 HERMETIC SYSTEMS INC.;
3 HIGHLAND PLATING CO.; HINES
4 WHOLESALE NURSERIES; HI-
5 PRODUCTION FORGE CO.;
6 HOMEXX INTERNATIONAL
7 CORP.; HORDIS BROTHERS; HOYA
8 LENS OF AMERICA INC.;
9 HUFFMAN MANUFACTURING
10 CO.; HUNTINGTON SIGNAL OIL
11 CO.; HUNTINGTON TILE INC.,
12 HUNTMIX INC.; IBIS SYSTEMS
13 INC.; IDEAL UNIFORM; IMPERIAL
14 METALS CORP. OF AMERICA;
15 INCA PRODUCTS CO.; INCO
16 UNITED STATES INC.;
17 INDUSTRIAL ASPHALT;
18 INDUSTRIAL INSULATORS &
19 SUPPLY INC.; INDUSTRIAL
20 INTERNATIONAL CORP.;
21 INDUSTRIAL RUBBER CEMENT
22 CO. INC.; INDUSTRIAL UNIFORM;
23 INDUSTRIAL WASTE
24 ENGINEERING; CITY OF
25 INGLEWOOD; INLAND SHOPPING
26 CENTER; INNOVATED
27 ELECTRONICS; INTERNATIONAL
28 DECORATIVES INC.;
INTERNATIONAL EXTRUSION
CORP.; INVESTMENT RECOVERY
SERVICES INC.; IRVINE RANCH
WATER DISTRICT; ISAAC COHEN
& SON METALS; ITT COURIER
TERMINAL SYSTEMS INC.; J. & S.
CHROME PLATING CO. INC.; J. &
S. LABORATORIES INC.; J. H.
BAXTER; J. L. JONES & CO.; J. W.
CARROL & SONS; JACAT OIL CO.;
JACK B KELLEY LLC; JACK
CLINE; JAY DIE CASTING; JAYBEE
MANUFACTURING CORP.;

1 JENKINS OIL CO. INC.; JENNINGS
2 PLATING CO. INC.; JERRALD
3 PROPERTIES; JERRY GOODWILL;
4 JETRONIC INDUSTRIES INC.; JMB
5 PROPERTY MANAGEMENT; JOHN
6 D. LUSK & SONS; JORCO INC.; K.
7 L. REDFERN CONSTRUCTION CO.;
8 KAG MERCHANT GAS GROUP;
9 KAISER PIPES & CASING; KAY
10 BRUNNER; KEECO; KELLER
11 STREET DEVELOPMENT CO.;
12 KELLEY MANUFACTURING CO.;
13 KELLOGG & SON DRILLING CO.;
14 KEN-AIR INC.; KENETEX
15 CHEMICALS; KERN FOODS INC.;
16 KETEMA ALUMINUM
17 EXTRUSION; KEYSTONE
18 PRODUCTS INC.; KIMCO
19 MANUFACTURING INC.;
20 KINSBURSKY BROTHERS SUPPLY
21 INC.; KIRKHILL INC.; KLEER PAK;
22 KLM OIL CO.; KNAPE & VOGT
23 MANUFACTURING; KOBOWAY;
24 KOCH ASPHALT CO. OIL;
25 KORODY COLYER CORP.;
26 KULBERG DEVELOPMENT CORP.;
27 L. & L. TANK LINES INC.; LA FON
28 EQUIPMENT CO.; LA VICTORIA
FOODS; LUBRICATING
SPECIALTIES; LACKAWANNA
LEATHER; LAKEWOOD OIL
SERVICE INC.; LAMIN ARTS;
LAMINATION TECHNOLOGY INC.;
LANGLOIS FLOUR CO.; LARRY
FRICKER CO. INC.; LATCHFORD
GLASS CO.; LE FIELL
MANUFACTURING CO.; LEACH
CORP.; LEAR SIEGLER INC.; LEE
PHARMACEUTICALS BRONCO
ENTERPRISES; LEWIS FOODS;
LIFE PAINT CORP.; LOCKHART

1 INDUSTRIES; LONG & CO.; LONG
2 BEACH OIL DEVELOPMENT CO.;
3 LONG BEACH PLATING CO.; LOS
4 ANGELES COMMUNITY COLLEGE
5 DISTRICT; LOS ANGELES SCREW
6 PRODUCTS INC.; LOS ANGELES
7 TANNING CO.; LUBRICATION CO.
8 OF AMERICA; LUNDEEN INC.;
9 LUNDEEN RAIL CAR REPAIR
10 SERVICE; LYCO FOOD
11 PRODUCTS; LYLE VAN PATTEN
12 CO. INC.; M. P. MCCAFFREY INC.;
13 M. SLAYEN & ASSOCIATES; M. V.
14 JAPAN CANELA; MACMILLAN OIL
15 CO.; MAGNA MILL PROD.;
16 MANESS EXCAVATING;
17 MARBETH CHEMICAL CO.;
18 MARCREST PACIFIC CO. INC.;
19 MARINA PACIFICA; MARK
20 INDUSTRIES; MARLEX OIL &
21 REFINING INC.; MARMAC
22 RESOURCE CO.; MARQUADT CO.;
23 MARQUIS INDUSTRIES; MASTER
24 FENCE FITTINGS; MASTER
25 PRODUCTS MANUFACTURING
26 CO.; MAYON FOODS; MCALMOND
27 OIL & GAS; MCAULEY OIL CO.;
28 MCCULLOCH CORP.; MCCURDY
CIRCUITS; MCMAHON
DEVELOPMENT;
MCNOTTINGHAM CO. OF
SOUTHERN CALIFORNIA;
MENASHA CORP.; MERIT OIL CO.;
METAL TREATERS INC.; METLOX
POTTERY; METROPOLITAN
CIRCUITS INC.; MILLER DIAL
CORP.; MILO EQUIPMENT CO.;
MISSION PLATING CO.; MODERN
COATINGS INC.; MODERN
PLATING CO.; MODINE
MANUFACTURING CO.; MOLA

1 DEVELOPMENT CORPORATION;
2 MONITOR PLATING &
3 ANODIZING;
4 MONOGRAM/PEACOCK
5 MANUFACTURING; MOTOR
6 PROCESSORS INC.; MPC
7 INDUSTRIES; MUSTANG
8 EQUIPMENT CO.; NARDON
9 MANUFACTURING CO. INC.;
10 NATIONAL PAINT & VARNISH CO.
11 INC.; NATIONAL STANDARD CO.;
12 NATIONAL TECHNOLOGY;
13 NATTIER MANUFACTURING CO.;
14 NELCO OIL REFINING CORP.;
15 NEW BASTION DEVELOPMENT,
16 INC. NEWHALL REFINING CO.
17 INC.; NEWPORT ELECTRONICS
18 INC.; NORDSKOG CO. INC.;
19 NORMAN HIGH DEMOLITION;
20 NORTHERN TELECOM; NORTON
21 & SON OF CALIFORNIA INC.; NOW
22 CONSTRUCTION CORP.; NU WAY
23 PLATING CO. INC.; OIL CO.;
24 OILFIELDS TRUCKING CO.; OIL
25 WELL SERVICE CO.; OLMSTEAD
26 TRUCKING; OLYMPIC PLATING &
27 POLISHING INC.; OMAR
28 INDUSTRIES; OMEGA OIL CO.
INC.; ONTARIO AUTO TRUCK
PLAZA; ORANGE COAST PLATING
INC.; ORANGE COUNTY DUST
CONTROL INC.; ORANGE COUNTY
ELECTRONICS CORP.; ORANGE
HEIGHTS ORANGE ASSOCIATION;
ORANGE CO. MACHINE WORKS;
ORANGE PRECISION CIRCUITS;
ORCHIDS PAPER PRODUCTS CO.;
OZALID CORP.; OZITE
CORPORATION; P. C. WORLD
ORANGE COUNTY; P. W.
STEPHENS CONTRACTORS INC.;

1 PACIFIC AIRMOTIVE CORP.;
2 PACIFIC COAST WAREHOUSE
3 CORP.; PACIFIC ENGINE; PACIFIC
4 FINANCIAL CENTER; PACIFIC
5 OASIS; PACIFIC PRECISION
6 METALS; PACIFIC PRESS; PACIFIC
7 TREATMENT CORP.; PACIFIC
8 TUBE CO.; PACIFIC VACUUM
9 TRUCK CO.; PACIFIC VALVES;
10 PACIFICA PLATING INC.; PACTRA
11 CO.; PALACE PLATING CO.; PAN
12 WESTERN OIL CO.; PARK METAL
13 CO.; PARSLEY & KENNEDY;
14 PASCOE BUILDING SYSTEMS;
15 PCA METAL FINISHING INC.;
16 PEASE & CURREN RELIABLE
17 RECOVERY INC.; PEMBINA;
18 PEPPER INDUSTRIES INC.;
19 PERLITE PROCESSING;
20 PERMALAB EQUIPMENT CORP.;
21 PETERSON MANUFACTURING CO.
22 INC.; PETRO LEWIS CORP.;
23 PETROCHEMICALS CO. INC.;
24 PHOTOTRON CORP.; PICHEL
25 INDUSTRIES INC.; PL PORTER CO.;
26 PLASTIC DRESS-UP CORP.; POLY
27 DISC SYSTEM INC.; POLYESTER
28 HUTCO GROUP; POLYMER
DEVELOPMENT LABS INC.; POST
TRANSPORTATION CO.;
POWERLINE SALES; PQ
CORPORATION; PRE RECORDING
CO.; PRECIPITATOR INC.;
PRECISION ANODIZING &
PLATING INC.; PRECISION HEAT
TREATING CO.; PREMIERE ALUM.
PROD. INC.; PRESIDENT LINCOLN;
PROCESS TECHNOLOGY CO.;
PRODUCTION PLATING CO.;
PRODUCTS ENGINEERING CORP.;
PROTOTECH CIRCUITRY; PSI

1 WEST; PTM & W INDUSTRIES
2 INC.; PUNCH PRESS PRODUCTS;
3 PVO INTERNATIONAL; QUALITY
4 ALUMINUM FORGE CO.; QUALITY
5 FARMS; QUALITY METAL
6 FINISHING CO.; QUALITY
7 SPRAYERS INC.; R. & E. PLATING
8 CO.; R. & R. INDUSTRIAL WASTE
9 HAULERS INC.; R. G. WALLACE
10 CO. INC.; RAINBOW TRUCKING
11 CO.; RAYNE WATER SYSTEMS;
12 REAL PROPERTY WEST INC.;
13 REBEL OIL CO. INC.; REDI-STRIP
14 CO. INC.; REDONDO OIL CO.;
15 REFINERS MARKETING CO.;
16 RELIABLE RECOVERY INC.;
17 RENTOKIL NORTH AMERICA,
18 INC.; RENU PLATING CO. INC.;
19 REVERE EXTRUDERS INC.; REX
20 PRECISION PRODUCTS INC.;
21 REXART CORP.; RHEEM METALS
22 INC.; RHO CHEM CORP.; RHS
23 CARPET MILL; RICHARDSON &
24 HOLLAND; RICHLYNN
25 TECHNOLOGY INC.; RINCHEM
26 CO. INC.; RIVERSIDE CEMENT
27 CO.; ROBERT KEITH & CO. INC.;
28 ROCKET INDUSTRIES; RODDING
CLEANING SERVICE; ROEHL
DISPOSAL SERVICES; ROHRIG
BROTHERS; RONALD M. JONES;
RONSON HYDRAULIC CORP.;
ROSE HILLS MEMORIAL PARK
ASSOCIATION; ROSENS ELECT.
EQUIP. CO.; ROTARY OFFSET
PRINTERS; ROUTH
TRANSPORTATION; ROYAL
PLATING WORKS; RUPES
HYDRAULICS; RUSSELL
BURDSALL & WARD INC.;
RUTHERFORD OIL CO.; S. ROSE

1 COOPERAGE; S. T. & I. INC.;
2 SAFETRAN SYSTEMS CORP.; SALS
3 PLATING; SAN FERNANDO
4 ELECTRIC MANUFACTURING CO.;
5 SANTA ANA DIESEL; SANTA
6 MONICA COLLEGE; SCHLITZ
7 BREWING CO.; SCOVILL INC.; SCS
8 INDUSTRIES; SEA LIFT
9 MARITIME; SECURITY
10 ENVIRONMENTAL SYSTEMS;
11 SHAFCO INDUSTRIES INC.;
12 SHASTA PAN OIL CO.; SIERRA
13 PACIFIC CONTAINER CORP.;
14 SINGER AEROSPACE; SNOW
15 SUMMIT SKI CORP.; SOCAL
16 FINISHING CO.; SOCO WEST, INC.;
17 SOLUTIA INC.; SONIC PLATING
18 CO.; SOUTHERN CALIFORNIA
19 WASTE REDUCTION; SOULE
20 STEEL CO.; SOUTH COAST
21 COUNTY WATER DISTRICT;
22 SOUTHERN CALIFORNIA DRUM
23 CO.; SOUTHWEST AIRCRAFT
24 SERVICES; SOUTHWEST METAL
25 CO.; SOUTHWEST PETRO
26 CHEMICAL; SOUTHWEST
27 PROCESSORS INC.;
28 SOUTHWESTERN ALLOYS INC.;
SPACE ORDINANCE SYSTEMS;
SPECIFIC PLATING CO. INC.;
SPECTRUM CHEMICAL
MANUFACTURING INC.; SPIRIT
SILKSCREEN; SSP
CONSTRUCTION EQUIPMENT
INC.; STANDARD BRANDS PAINT
CO. INC.; STANDARD
CRANKSHAFT INC.; STANDARD
FELT CO.; STANDARD NICKEL
CHROMIUM PLATING; STANDUN
INC.; STANG HYDRONICS; STAR
NAMEPLATE CO.; STATEWIDE

1 ENVIRONMENTAL SERVICES;
2 STEPHEN C. GROAT
3 DEVELOPMENT; STEPONOVICH &
4 LONG; STEVERSON BROS;
5 STINNES WESTERN CHEMICAL
6 CORP.; SUMMIT INK CO.; SUPER
7 TECH; SUPERCHROME
8 ENGINEERING CO.; SUPERIOR
9 INDUSTRIAL PUMPING;
10 SUPERIOR PACIFIC
11 GALVANIZING CO.; SUPERIOR
12 PLATING; SUPRACOTE INC.;
13 SYNRES CHEMICAL CORP.;
14 SYSTEMS FURNITURE CO.; T. P.
15 HEARNE CO.; TAC ALUMINUM
16 PROCESSING; TARGET CHEMICAL
17 CO.; TARNUTZER VENTURE;
18 TEAL INDUSTRIES; TEXAS
19 POLYMERS; TEXTILE RUBBER &
20 CHEMICAL CO.; THATCHER
21 GLASS; THOMPSON TANK
22 CONSTRUCTION; TEXTURED
23 COATINGS; THRIFTY MART CO.;
24 THRIFTY OIL CO.; TIMCO; TITECH
25 INTERNATIONAL INC.; TMC
26 PROPERTIES LLC; TOOL & JIG
27 PLATING; TORRANCE BUSINESS
28 PARK; TRANS HARBOR SERVICE;
TRENT TUBE CO.; TREWAX CO.;
TRI-COUNTY INSULATION CO.
INC.; TRIAD MARINE &
INDUSTRIAL CLEANING; TRIMM
INDUSTRIES; TRIMM
TECHNOLOGIES, INC.; TUBING
SEAL CAP CO.; U.S. PREFINISHED
METALS; UNION
MANUFACTURING CO.; UNION
PACKING; UNION TRIBUNE
PUBLISHING CO.; UNITOG
RENTAL SERVICES INC.;
UNIVERSAL CIRCUITS INC.;

1 UNIVERSAL MOLDING
2 COMPANY; UNIVERSAL PAINT
3 CORP.; USA PETROLEUM; V&M
4 PRECISION GRINDING; VAL
5 CIRCUITS INC.; VALLEY BRAKE
6 BOND CO. INC.; VALLEY
7 FRICTION MATERIALS; VAN DER
8 HORST CORP.; VERNON LEATHER
9 CO.; VISITRON CORP.; VOI SHAN;
10 W. L. CHAPMAN CO.; W. S. HATCH
11 CO.; W. W. IRWIN CO.; WARNERS
12 DEAD STOCK; WATERFRONT
13 SERVICES; WAYMIRE DRUM CO.
14 INC.; WEBER METALS INC.; WELL
15 TECH INC.; WESCAL INDUSTRIES;
16 WEST AMERICAN RUBBER;
17 WESTERN CIRCUITS; WESTERN
18 DYEING & FINISHING; WESTERN
19 ELECTROPLATING INC.;
20 WESTERN GALVANIZING CO.;
21 WESTERN METALS CORP.;
22 WESTERN OIL & REFINING CO.
23 INC.; WESTERN REBUILDER INC.;
24 WESTERN SPECIALTY COATINGS
25 CO.; WESTERN STATES REFINING;
26 WESTERN WHEEL
27 MANUFACTURING CO.;
28 WESTWAY TERMINAL CO. INC.;
WHEEL SERVICE GROUP INC.;
WHITCOMB PLATING INC.;
WHITEWORTH INC.; WHITFIELD
TANK LINES; WHITTIER CHROME
& PLATING; WILCOR INC.;
WILMINGTON LIQUID BULK;
WILSHIRE INDUSTRIES;
WINCHESTER INN; WINONICS
INC.; WYNDHAM
MANUFACTURING CO. INC.;
XIDEX CORP.; ZAPATA
CONSTRUCTION INC.; ZERO
CORP.; ZOLATONE PROCESS INC.;

1 ZONVER DRILLING; CITY OF
2 BALDWIN PARK; CITY OF
3 FONTANA; CITY OF GARDENA;
4 CITY OF POMONA; CITY OF
WHITTIER; AND DOES 1-10,

5
6 Defendants.

7 Plaintiffs BKK WORKING GROUP; ANADARKO E&P ONSHORE
8 LLC; ATLANTIC RICHFIELD COMPANY; ASHLAND INC.; BAYER
9 CROPSCIENCE INC.; BIG HEART PET BRANDS; THE BOEING
10 COMPANY; CALIFORNIA RESOURCES CORPORATION; CHEVRON
11 ENVIRONMENTAL MANAGEMENT COMPANY; CHEVRON MARINE
12 PRODUCTS LLC; CITY OF LOS ANGELES, ACTING BY AND
13 THROUGH THE LOS ANGELES DEPARTMENT OF WATER AND
14 POWER; CONOCOPHILLIPS COMPANY; CROSBY & OVERTON, INC.;
15 THE DOW CHEMICAL COMPANY; DUCOMMUN AEROSTRUCTURES,
16 INC.; ESSEX CHEMICAL CORPORATION; EXXON MOBIL
17 CORPORATION; GEMINI INDUSTRIES, INC.; GENERAL DYNAMICS
18 CORPORATION; GENERAL LATEX AND CHEMICAL CORPORATION;
19 HEWLETT-PACKARD COMPANY; AMERICAN HONDA MOTOR CO.,
20 INC.; HUNTINGTON BEACH COMPANY; LOCKHEED MARTIN
21 CORPORATION; MARS, INC. (FORMERLY KNOWN AS KAL KAN
22 FOODS INC.); MONTROSE CHEMICAL CORP. OF CALIFORNIA;
23 MORTELL COMPANY; MORTON INTERNATIONAL, INC.; NATIONAL
24 STEEL AND SHIPBUILDING COMPANY; NORTHROP GRUMMAN
25 SYSTEMS CORPORATION; OXY USA INC.; QUEMETCO, INC.;
26 ROCKWELL AUTOMATION, INC.; ROHM & HAAS COMPANY; ROHR,
27 INC.; SAN DIEGO GAS & ELECTRIC COMPANY; SMITH
28 INTERNATIONAL, INC.; SOUTHERN CALIFORNIA EDISON

1 COMPANY; SOUTHERN CALIFORNIA GAS COMPANY; STAUFFER
2 MANAGEMENT COMPANY LLC; THE PROCTER & GAMBLE
3 MANUFACTURING COMPANY; THUMS LONG BEACH COMPANY;
4 UNION CARBIDE CORPORATION; UNION PACIFIC RAILROAD
5 (FORMERLY KNOWN AS SOUTHERN PACIFIC TRANSPORTATION
6 COMPANY); UNITED STATES STEEL CORPORATION; RTX
7 CORPORATION; UNIVAR SOLUTIONS USA LLC; AMERON
8 INTERNATIONAL CORPORATION; AND XEROX CORPORATION
9 (collectively referred to herein as “Plaintiffs” or individually as “Plaintiff”)
10 allege as follows:

11 **STATEMENT OF THE CASE**

12 1. This is a civil action for cost recovery and contribution under Sections
13 107(a) and Section 113 of the Comprehensive Environmental Response,
14 Compensation and Liability Act of 1980, as amended, 42 U.S.C. § 9601 *et. seq.*
15 (“CERCLA”), and for contribution under The Carpenter-Presley-Tanner Hazardous
16 Substance Account Act (“HSAA”), California Health and Safety Code section
17 78000 *et seq.*,¹ relating to the release and/or threatened release of hazardous
18 substances, as that term is defined in Section 101(14) of CERCLA, 42 U.S.C.
19 § 9601 (“Hazardous Substances”), from a facility known as the BKK Class I
20 Landfill.

21 2. The BKK Class I Landfill is located on a portion of a much larger 583-
22 acre property located at 2210 South Azusa Avenue, West Covina, Los Angeles
23 County, California. Other facilities located on this property include a closed Class
24 III municipal landfill, a Leachate Treatment Plant (“LTP”), service roads, and
25 related pollution control equipment. The BKK Class I Landfill and the LTP,
26 _____

27 ¹ Effective January 1, 2024, the California Legislature recodified and reorganized
28 the HSAA without substantive changes. (2022 Cal. Legis. Serv. Ch. 257 (Assem.
Bill No. 2293).

1 service roads, and related pollution control equipment which serve it, are
2 collectively referred to hereinafter as the “BKK Class I Facility”² and are the
3 subject of this lawsuit. The closed Class III municipal landfill is not the subject of
4 this lawsuit. True and correct copies of the parcel maps describing the property are
5 attached hereto as **Exhibit A**.

6 3. The State of California has alleged in a series of three complaints filed
7 against some or all of the Plaintiffs³ that it has incurred response costs in
8 connection with actions taken in response to releases or threatened releases of
9 Hazardous Substances at the BKK Class I Facility. Each of the parties named as a
10 defendant herein at paragraphs 61-806 and Does 1-10 (collectively referred to
11 herein as “Defendants” or individually as “Defendant”) generated, transported
12 and/or arranged for disposal of materials containing Hazardous Substances to the
13 BKK Facility.

14 4. Plaintiffs seek to recover from each Defendant pursuant to Section
15 107(a) of CERCLA, 42 U.S.C. § 9607(a), past and future necessary response costs
16 incurred and to be incurred by Plaintiffs in a manner consistent with the National
17 Contingency Plan, 40 C.F.R. Part 300 *et. seq.* (“NCP”), for response activities
18 undertaken and to be undertaken at and in relation to the BKK Class I Facility that
19 were caused by the release or threatened release of Hazardous Substances at and
20 from the BKK Class I Facility.

21 5. Plaintiffs also seek contribution from each Defendant pursuant to
22 Section 113(f) of CERCLA, 42 U.S.C. § 9613(f), for past and future necessary
23 response costs incurred and to be incurred by Plaintiffs pursuant to the First,
24 _____

25 ² “BKK Class I Facility,” as used herein, is equivalent to the term “Subject
26 Property” as that term is used in the First, Second, Third Partial and Amended
27 Third Partial Consent Decrees. The First, Second, Third Partial and Amended
28 Third Partial Consent Decrees are defined *infra* at Paragraphs 908, 913, 918 and
923, respectively.

³ The three complaints are described in more detail in paragraphs 907, 912, 917,
and 922 *infra*.

1 Second, Third Partial and Amended Third Partial Consent Decrees in a manner
2 consistent with the NCP for response activities undertaken and to be undertaken at
3 and in relation to the BKK Class I Facility that were caused by the release or
4 threatened release of Hazardous Substances at and from the BKK Class I Facility.

5 6. Plaintiffs further seek a declaration as to each Defendant's liability and
6 associated allocation of past and future response costs in accordance with Section
7 113(g)(2)(B) of CERCLA, 42 U.S.C. § 9613(g)(2)(B), and *Boeing Co. v. Cascade*
8 *Corp.*, 207 F.3d 1177, 1191 (9th Cir. 2000), that will be binding in any subsequent
9 action or actions brought by Plaintiffs against the Defendants to recover further
10 response costs.

11 7. Plaintiffs additionally seek contribution from each Defendant pursuant
12 to the Hazardous Substance Account Act ("HSAA"), Cal. Health and Safety Code
13 §§ 78000 et seq., and Cal. Health and Safety Code § 79670 for past and future
14 necessary response costs incurred and to be incurred by Plaintiffs in a manner
15 consistent with the NCP to address releases or threatened releases of Hazardous
16 Substances at and from the BKK Class I Facility.

17 8. Plaintiffs are also entitled to complete or partial indemnity from
18 Defendants for all costs incurred or to be incurred at the BKK Class I Facility,
19 pursuant to the doctrine of equitable indemnification.

20 9. A sub-set of Plaintiffs who allege they have reimbursed entities or
21 directly paid for and participated in directing response actions on behalf of other
22 entities (including other Plaintiffs) that have incurred past, necessary response
23 costs, including pursuant to the First, Second, Third Partial and Amended Third
24 Partial Consent Decrees in a manner consistent with the NCP, for response
25 activities undertaken at and in relation to the BKK Class I Facility, assert
26 subrogated cost recovery and contribution claims against each Defendant pursuant
27 to Section 112(c)(3) of CERCLA, 42 U.S.C. § 9612(c)(3), and pursuant to common
28 law equitable subrogation.

1 10. Plaintiffs also seek a declaratory judgment pursuant to the Declaratory
2 Judgment Act, 28 U.S.C. § 2201, *et seq.*, and California Code of Civil Procedure
3 §1060 setting forth the parties’ rights and obligations toward one another for future
4 costs incurred to address contamination at or from the BKK Class I Facility.

5 11. The BKK Working Group has incurred or is committed to incur not
6 less than approximately \$250 million in costs associated with the BKK Class I
7 Facility, and the total cost of necessary response actions to fully remediate the BKK
8 Class I Facility was estimated by the State of California Department of Toxic
9 Substances Control (“DTSC”) in 2020 to be \$869,286,436. Each Defendant has
10 declined or not responded to Plaintiffs’ request(s) to enter into, or has otherwise not
11 entered into, a tolling agreement to facilitate settlement discussions, necessitating
12 this lawsuit to resolve Defendants’ liabilities.

13 **JURISDICTION**

14 12. This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1331
15 and Section 113(b) of CERCLA, 42 U.S.C. § 9613(b). This Court has jurisdiction
16 over the subject matter of the claims made under state law in this action under 28
17 U.S.C. § 1367(a) because the claims under state law arise out of the same common
18 nucleus of facts as the federal question jurisdiction claims set forth in this
19 Complaint, and they are so closely related to the actions brought under federal law
20 that they form part of the same case or controversy.

21 **VENUE**

22 13. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)
23 because a substantial part of the events giving rise to this action occurred within
24 this District and because the BKK Class I Facility is located within this District.

25 14. Venue is also proper in this District pursuant to Section 113(b) of
26 CERCLA, 42 U.S.C. § 9613(b), because both the releases occurred and the
27 response costs were incurred in this District.

PLAINTIFFS

1
2 15. The BKK Working Group, also known as the BKK Joint Defense
3 Group, is an unincorporated association of entities of the type described in Federal
4 Rule of Civil Procedure 17(b)(3)(A) and Cal. Code of Civil Procedure § 369.5. The
5 BKK Working Group currently is comprised of the Plaintiffs identified in
6 paragraphs 16-63 below as members, which assert the claims in this Sixth
7 Amended Complaint on their own behalf and as assignees of the claims at the BKK
8 Class I Facility of the following entities that are also BKK Working Group
9 members: Baker Petrolite LLC; Honeywell International Inc., Hugo Neu Proler,
10 Shell Oil Company, Vigor Shipyards, Inc., formerly known as Todd Pacific
11 Shipyard Corp., Unisys Corporation, and Wyeth Holdings, formerly known as
12 American Cyanamid (collectively referred to as the “Member Assignors”). The
13 BKK Working Group is also a Plaintiff as assignee of CERCLA claims relating to
14 the BKK Class I Facility of the Member Assignors. Plaintiffs are working together
15 towards the common objective of addressing conditions at the BKK Class I Facility
16 in cooperation with state and federal agencies. Each Plaintiff has incurred costs,
17 including response costs consistent with the NCP, at the BKK Class I Facility. The
18 BKK Working Group, and each of its individual members, is a “person” within the
19 meaning of CERCLA § 101(21), 42 U.S.C. § 9601(21).

20 16. Plaintiff Anadarko E&P Onshore LLC is a corporation organized
21 under the laws of the State of Delaware. At all times referred to herein, Anadarko
22 E&P Onshore LLC, or its corporate predecessor(s) in interest or affiliate(s), was
23 and is authorized to do business, and was and is doing business, in California. The
24 State of California has alleged that Plaintiff Anadarko E&P Onshore LLC, or its
25 corporate predecessor(s) in interest or affiliate(s), arranged for the disposal of a
26 Hazardous Substance at the BKK Class I Facility, as those terms are described in
27 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Anadarko E&P Onshore
28 LLC is a member of the BKK Working Group and as a member of the BKK

1 Working Group has incurred costs, including response costs consistent with the
2 NCP, at the BKK Class I Facility. Anadarko E&P Onshore LLC asserts no
3 allegations against the following Defendants: the City of Carson, the City of
4 Riverside, and the City of San Diego.

5 17. Plaintiff Atlantic Richfield Company is a corporation organized under
6 the laws of the State of Delaware. At all times referred to herein, Atlantic Richfield
7 Company, or its corporate predecessor(s) in interest or affiliate(s), was and is
8 authorized to do business, and was and is doing business, in California. The State
9 of California has alleged that Plaintiff Atlantic Richfield Company, or its corporate
10 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
11 Substance at the BKK Class I Facility, as those terms are described in section
12 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Atlantic Richfield Company is a
13 member of the BKK Working Group and as a member of the BKK Working Group
14 has incurred costs, including response costs consistent with the NCP, at the BKK
15 Class I Facility.

16
17 18. Plaintiff Ashland Inc. is a corporation organized under the laws of the
18 State of Kentucky and authorized to do business in the State of California. Ashland
19 Inc. is the corporate successor of Ashland Chemical Company and, for the matters
20 set forth herein, the assignee of Filtrol's claims in the litigation. The State of
21 California has alleged that Ashland Chemical Company and Filtrol Corporation are
22 Covered Persons, as described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a),
23 who arranged for the disposal of Hazardous Substances at the BKK Class I Facility.
24 Ashland Inc. and Filtrol Corporation are members of the BKK Working Group and
25 as members of the BKK Working Group have incurred costs, including response
26 costs consistent with the NCP, at the BKK Class I Facility.

27 19. Plaintiff Bayer CropScience, Inc. is a corporation organized under the
28 laws of the State of Delaware. At all times referred to herein, Bayer CropScience

1 Inc., or its corporate predecessor(s) in interest or affiliate(s), was and is authorized
2 to do business, and was and is doing business, in California. The State of
3 California has alleged that Plaintiff Bayer CropScience Inc. , or its corporate
4 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
5 Substance at the BKK Class I Facility, as those terms are described in section
6 107(a) of CERCLA, 42 U.S.C. § 9607(a). Bayer CropScience Inc., as a member of
7 the BKK Working Group, has incurred costs, including response costs consistent
8 with the NCP, at the BKK Class I Facility.

9 20. Plaintiff Big Heart Pet Brands is a corporation organized under the
10 laws of the State of Delaware. At all times referred to herein, Big Heart Pet Brands,
11 or its corporate predecessor(s) in interest or affiliate(s), was and is authorized to do
12 business, and was and is doing business, in California. The State of California has
13 alleged that the assignee to the successor in interest to certain liability of H.J. Heinz
14 Company, or its corporate predecessor(s) in interest or affiliate(s), arranged for the
15 disposal of a Hazardous Substance at the BKK Class I Facility, as those terms are
16 described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Big Heart
17 Pet Brands is a member of the BKK Working Group and as a member of the BKK
18 Working Group has incurred costs, including response costs consistent with the
19 NCP, at the BKK Class I Facility.

20 21. Plaintiff The Boeing Company is a corporation organized under the
21 laws of the State of Delaware. At all times referred to herein, The Boeing
22 Company, or its corporate predecessor(s) in interest or affiliate(s), was and is
23 authorized to do business, and was and is doing business, in California. The State
24 of California has alleged that Plaintiff The Boeing Company, or its corporate
25 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
26 Substance at the BKK Class I Facility, as those terms are described in section
27 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff The Boeing Company is a
28 member of the BKK Working Group. As a member of the BKK Working Group,

1 and also prior to becoming a member, The Boeing Company has incurred costs,
2 including response costs consistent with the NCP, at the BKK Class I Facility.

3 22. Plaintiff California Resources Corporation is a corporation organized
4 under the laws of the State of Pennsylvania. At all times referred to herein,
5 California Resources Corporation, or its corporate predecessor(s) in interest or
6 affiliate(s), was and is authorized to do business, and was and is doing business, in
7 California. The State of California has alleged that Plaintiff California Resources
8 Corporation, or its corporate predecessor(s) in interest or affiliate(s), arranged for
9 the disposal of a Hazardous Substance at the BKK Class I Facility, as those terms
10 are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff
11 California Resources Corporation is a member of the BKK Working Group and as a
12 member of the BKK Working Group has incurred costs, including response costs
13 consistent with the NCP, at the BKK Class I Facility

14 23. Plaintiff Chevron Environmental Management Company is a
15 corporation organized under the laws of the State of California. At all times referred
16 to herein, Chevron Environmental Management Company, or its corporate
17 predecessor(s) in interest or affiliate(s), was and is authorized to do business, and
18 was and is doing business, in California. The State of California has alleged that
19 certain corporate affiliates of Plaintiff Chevron Environmental Management
20 Company, or its corporate predecessor(s) in interest or affiliate(s), arranged for the
21 disposal of a Hazardous Substance at the BKK Class I Facility, as those terms are
22 described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Chevron
23 Environmental Management Company is a member of the BKK Working Group
24 and as a member of the BKK Working Group has incurred costs, including
25 response costs consistent with the NCP, at the BKK Class I Facility.

26 24. Plaintiff Chevron Marine Products LLC is a limited liability company
27 organized under the laws of the State of Delaware. At all times referred to herein,
28 Chevron Marine Products LLC, or its corporate predecessor(s) in interest or

1 affiliate(s), was and is authorized to do business, and was and is doing business, in
2 California. The State of California has alleged that Plaintiff Chevron Marine
3 Products LLC, or its corporate predecessor(s) in interest or affiliate(s), arranged for
4 the disposal of a Hazardous Substance at the BKK Class I Facility, as those terms
5 are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff
6 Chevron Marine Products LLC is a member of the BKK Working Group and as a
7 member of the BKK Working Group has incurred costs, including response costs
8 consistent with the NCP, at the BKK Class I Facility.

9 25. Plaintiff City of Los Angeles, acting by and through the Los Angeles
10 Department of Water and Power, is a municipal utility. The State of California has
11 alleged that Plaintiff City of Los Angeles arranged for the disposal of a Hazardous
12 Substance at the BKK Class I Facility, as those terms are described in section
13 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff City of Los Angeles, acting by
14 and through the Los Angeles Department of Water and Power, is a member of the
15 BKK Working Group and as a member of the BKK Working Group has incurred
16 costs, including response costs consistent with the NCP, at the BKK Class I
17 Facility.

18 26. Plaintiff ConocoPhillips Company is a corporation organized under the
19 laws of the State of Delaware. At all times referred to herein, ConocoPhillips
20 Company, or its corporate predecessor(s) in interest or affiliate(s), was and is
21 authorized to do business, and was and is doing business, in California. The State
22 of California has alleged that Plaintiff ConocoPhillips Company, or its corporate
23 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
24 Substance at the BKK Class I Facility, as those terms are described in section
25 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff ConocoPhillips Company is a
26 member of the BKK Working Group and as a member of the BKK Working Group
27 has incurred costs, including response costs consistent with the NCP, at the BKK
28 Class I Facility.

1 27. Plaintiff Crosby & Overton, Inc. is a corporation organized under the
2 laws of the State of California. At all times referred to herein, Crosby & Overton,
3 Inc., or its corporate predecessor(s) in interest or affiliate(s), was and is authorized
4 to do business, and was and is doing business, in California. The State of
5 California has alleged that Plaintiff Crosby & Overton, Inc., or its corporate
6 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
7 Substance at the BKK Class I Facility, as those terms are described in section
8 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Crosby & Overton, Inc. is a
9 member of the BKK Working Group and as a member of the BKK Working Group
10 has incurred costs, including response costs consistent with the NCP, at the BKK
11 Class I Facility.

12 28. Plaintiff The Dow Chemical Company is a corporation organized
13 under the laws of the State of Delaware. At all times referred to herein, The Dow
14 Chemical Company, or its corporate predecessor(s) in interest or affiliate(s), was
15 and is authorized to do business, and was and is doing business, in California. The
16 State of California has alleged that Plaintiff The Dow Chemical Company arranged
17 for the disposal of a Hazardous Substance at the BKK Class I Facility, as those
18 terms are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff
19 The Dow Chemical Company is a member of the BKK Working Group and as a
20 member of the BKK Working Group has incurred costs, including response costs
21 consistent with the NCP, at the BKK Class I Facility.

22 29. Plaintiff Ducommun Aerostructures, Inc. is a corporation organized
23 under the laws of the State of Delaware. At all times referred to herein, Ducommun
24 Aerostructures, Inc. , or its corporate predecessor(s) in interest or affiliate(s), was
25 and is authorized to do business, and was and is doing business, in California. The
26 State of California has alleged that Plaintiff Ducommun Aerostructures, Inc. , or its
27 corporate predecessor(s) in interest or affiliate(s), arranged for the disposal of a
28 Hazardous Substance at the BKK Class I Facility, as those terms are described in

1 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Ducommun
2 Aerostructures, Inc. is a member of the BKK Working Group and as a member of
3 the BKK Working Group has incurred costs, including response costs consistent
4 with the NCP, at the BKK Class I Facility.

5 30. Plaintiff Essex Chemical Corporation is a corporation organized under
6 the laws of the State of New Jersey. At all times referred to herein, Essex Chemical
7 Corporation, or its corporate predecessor(s) in interest or affiliate(s), was and is
8 authorized to do business, and was and is doing business, in California. The State
9 of California has alleged that Plaintiff Essex Chemical Corporation, or its corporate
10 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
11 Substance at the BKK Class I Facility, as those terms are described in section
12 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Essex Chemical Corporation is
13 a member of the BKK Working Group and as a member of the BKK Working
14 Group has incurred costs, including response costs consistent with the NCP, at the
15 BKK Class I Facility.

16 31. Plaintiff Exxon Mobil Corporation is a corporation organized under
17 the laws of the State of New Jersey. At all times referred to herein, Exxon Mobil
18 Corporation, or its corporate predecessor(s) in interest or affiliate(s), was and is
19 authorized to do business, and was and is doing business, in California. The State
20 of California has alleged that Plaintiff Exxon Mobil Corporation, or its corporate
21 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
22 Substance at the BKK Class I Facility, as those terms are described in section
23 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Exxon Mobil Corporation is a
24 member of the BKK Working Group and as a member of the BKK Working Group
25 has incurred costs, including response costs consistent with the NCP, at the BKK
26 Class I Facility.

27 32. Plaintiff Gemini Industries, Inc. is a corporation organized under the
28 laws of the State of California. At all times referred to herein, Gemini Industries,

1 Inc., or its corporate predecessor(s) in interest or affiliate(s), was and is authorized
2 to do business, and was and is doing business, in California. The State of
3 California has alleged that Plaintiff Gemini Industries, Inc. , or its corporate
4 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
5 Substance at the BKK Class I Facility, as those terms are described in section
6 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Gemini Industries, Inc. is a
7 member of the BKK Working Group. As a member of the BKK Working Group,
8 and also prior to becoming a Member, Gemini Industries, Inc. has incurred costs,
9 including response costs consistent with the NCP, at the BKK Class I Facility.

10 33. Plaintiff General Dynamics Corporation is a corporation organized
11 under the laws of the State of Delaware. During the years of operation of the BKK
12 Class I Landfill, specifically from approximately 1975 until 1984, General
13 Dynamics Corporation, or its corporate predecessor(s) in interest or affiliate(s), was
14 authorized to do business, and was doing business, in California. The State of
15 California has alleged that Plaintiff General Dynamics Corporation, or its corporate
16 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
17 Substance at the BKK Class I Facility, as those terms are described in section
18 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff General Dynamics Corporation
19 is a member of the BKK Working Group and as a member of the BKK Working
20 Group has incurred costs, including response costs consistent with the NCP, at the
21 BKK Class I Facility.

22 34. Plaintiff General Latex and Chemical Corporation is a corporation
23 organized under the laws of the State of Massachusetts. At all times referred to
24 herein, General Latex and Chemical Corporation, or their corporate predecessor(s)
25 in interest or affiliate(s), was and is authorized to do business, and was and is doing
26 business, in California. The State of California has alleged that Plaintiff General
27 Latex and Chemical Corporation, or their corporate predecessor(s) in interest or
28 affiliate(s), arranged for the disposal of a Hazardous Substance at the BKK Class I

1 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
2 9607(a). Plaintiff General Latex and Chemical Corporation is a member of the
3 BKK Working Group and as a member of the BKK Working Group has incurred
4 costs, including response costs consistent with the NCP, at the BKK Class I
5 Facility.

6 35. Plaintiff Hewlett-Packard Company is a corporation organized under
7 the laws of the State of Delaware. At all times referred to herein, Hewlett-Packard
8 Company, or its corporate predecessor(s) in interest or affiliate(s), was and is
9 authorized to do business, and was and is doing business, in California. The State
10 of California has alleged that Plaintiff Hewlett-Packard Company, or its corporate
11 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
12 Substance at the BKK Class I Facility, as those terms are described in section
13 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Hewlett-Packard Company is a
14 member of the BKK Working Group and as a member of the BKK Working Group
15 has incurred costs, including response costs consistent with the NCP, at the BKK
16 Class I Facility.

17 36. Plaintiff American Honda Motor Co., Inc. is a corporation organized
18 under the laws of the State of California. At all times referred to herein, American
19 Honda Motor Co., Inc. , or its corporate predecessor(s) in interest or affiliate(s),
20 was and is authorized to do business, and was and is doing business, in California.
21 The State of California has alleged that Plaintiff American Honda Motor Co., Inc. ,
22 or its corporate predecessor(s) in interest or affiliate(s), arranged for the disposal of
23 a Hazardous Substance at the BKK Class I Facility, as those terms are described in
24 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff American Honda Motor
25 Co. is a member of the BKK Working Group and as a member of the BKK
26 Working Group has incurred costs, including response costs consistent with the
27 NCP, at the BKK Class I Facility.

28

1 37. Plaintiff Huntington Beach Company is a corporation organized under
2 the laws of the State of California. At all times referred to herein, Huntington Beach
3 Company, or its corporate predecessor(s) in interest or affiliate(s), was and is
4 authorized to do business, and was and is doing business, in California. The State
5 of California has alleged that Plaintiff Huntington Beach Company, or its corporate
6 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
7 Substance at the BKK Class I Facility, as those terms are described in section
8 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Huntington Beach Company is
9 a member of the BKK Working Group and as a member of the BKK Working
10 Group has incurred costs, including response costs consistent with the NCP, at the
11 BKK Class I Facility.

12 38. Plaintiff Lockheed Martin Corporation is a corporation organized
13 under the laws of the State of Maryland. At all times referred to herein, Lockheed
14 Martin Corporation, or its corporate predecessor(s) in interest or affiliate(s), was
15 and is authorized to do business, and was and is doing business, in California. The
16 State of California has alleged that Plaintiff Lockheed Martin Corporation, or its
17 corporate predecessor(s) in interest or affiliate(s), arranged for the disposal of a
18 Hazardous Substance at the BKK Class I Facility, as those terms are described in
19 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Lockheed Martin
20 Corporation is a member of the BKK Working Group. As a Member of the BKK
21 Working Group, and also prior to becoming a member, Lockheed Martin
22 Corporation has incurred costs, including response costs consistent with the NCP,
23 at the BKK Class I Facility.

24 39. Plaintiff Mars, Inc. (formerly known as Kal Kan Foods Inc.) is a
25 corporation organized under the laws of the State of Delaware. At all times referred
26 to herein, Mars, Inc. , or its corporate predecessor(s) in interest or affiliate(s), was
27 and is authorized to do business, and was and is doing business, in California. The
28 State of California has alleged that Plaintiff Mars, Inc. , or its corporate

1 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
2 Substance at the BKK Class I Facility, as those terms are described in section
3 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Mars, Inc. is a member of the
4 BKK Working Group and as a member of the BKK Working Group has incurred
5 costs, including response costs consistent with the NCP, at the BKK Class I
6 Facility.

7 40. Plaintiff Montrose Chemical Corp. of California is a corporation
8 organized under the laws of the State of Delaware. At all times referred to herein,
9 Montrose Chemical Corp. of California, or its corporate predecessor(s) in interest or
10 affiliate(s), was and is authorized to do business, and was and is doing business, in
11 California. The State of California has alleged that Plaintiff Montrose Chemical
12 Corp. of California, or its corporate predecessor(s) in interest or affiliate(s), of
13 California arranged for the disposal of a Hazardous Substance at the BKK Class I
14 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
15 9607(a). Plaintiff Montrose Chemical Corp. of California is a member of the BKK
16 Working Group and as a member of the BKK Working Group has incurred costs,
17 including response costs consistent with the NCP, at the BKK Class I Facility.

18 41. Plaintiff Mortell Company is a corporation organized under the laws of
19 the State of Delaware. At all times referred to herein, Mortell Company, or its
20 corporate predecessor(s) in interest or affiliate(s), was and is authorized to do
21 business, and was and is doing business, in California. The State of California has
22 alleged that Plaintiff Mortell Company, or its corporate predecessor(s) in interest or
23 affiliate(s), arranged for the disposal of a Hazardous Substance at the BKK Class I
24 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
25 9607(a). Plaintiff Mortell Company is a member of the BKK Working Group and
26 as a member of the BKK Working Group has incurred costs, including response
27 costs consistent with the NCP, at the BKK Class I Facility.

1 42. Plaintiff Morton International, Inc. is a corporation organized under
2 the laws of the State of Indiana. At all times referred to herein, Morton
3 International, Inc., or its corporate predecessor(s) in interest or affiliate(s), was and
4 is authorized to do business, and was and is doing business, in California. The
5 State of California has alleged that Plaintiff Morton International, Inc., or its
6 corporate predecessor(s) in interest or affiliate(s), arranged for the disposal of a
7 Hazardous Substance at the BKK Class I Facility, as those terms are described in
8 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Morton International,
9 Inc. is a member of the BKK Working Group and as a member of the BKK
10 Working Group has incurred costs, including response costs consistent with the
11 NCP, at the BKK Class I Facility.

12 43. Plaintiff National Steel and Shipbuilding Company is a corporation
13 organized under the laws of the State of Nevada. At all times referred to herein,
14 National Steel and Shipbuilding Company, or its corporate predecessor(s) in
15 interest or affiliate(s), was and is authorized to do business, and was and is doing
16 business, in California. The State of California has alleged that Plaintiff National
17 Steel and Shipbuilding Company, or its corporate predecessor(s) in interest or
18 affiliate(s), arranged for the disposal of a Hazardous Substance at the BKK Class I
19 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
20 9607(a). Plaintiff National Steel and Shipbuilding Company is a member of the
21 BKK Working Group and as a member of the BKK Working Group has incurred
22 costs, including response costs consistent with the NCP, at the BKK Class I
23 Facility.

24 44. Plaintiff Northrop Grumman Systems Corporation is a corporation
25 organized under the laws of the State of Delaware. At all times referred to herein,
26 Northrop Grumman Systems Corporation, or its corporate predecessor(s) in interest
27 or affiliate(s), was and is authorized to do business, and was and is doing business,
28 in California. The State of California has alleged that Plaintiff Northrop Grumman

1 Systems Corporation, or its corporate predecessor(s) in interest or affiliate(s),
2 arranged for the disposal of a Hazardous Substance at the BKK Class I Facility, as
3 those terms are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a).
4 Plaintiff Northrop Grumman Systems Corporation is a member of the BKK
5 Working Group and as a member of the BKK Working Group has incurred costs,
6 including response costs consistent with the NCP, at the BKK Class I Facility.

7 45. Plaintiff Oxy USA Inc. is a corporation organized under the laws of
8 the State of Delaware. At all times referred to herein, Oxy USA Inc. , or its
9 corporate predecessor(s) in interest or affiliate(s), was and is authorized to do
10 business, and was and is doing business, in California. The State of California has
11 alleged that Plaintiff Oxy USA Inc. , or its corporate predecessor(s) in interest or
12 affiliate(s), arranged for the disposal of a Hazardous Substance at the BKK Class I
13 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
14 9607(a). Plaintiff Oxy USA Inc. is a member of the BKK Working Group and as a
15 member of the BKK Working Group has incurred costs, including response costs
16 consistent with the NCP, at the BKK Class I Facility

17 46. Plaintiff Quemetco, Inc. is a corporation organized under the laws of
18 the State of Delaware. At all times referred to herein, Quemetco, Inc., or its
19 corporate predecessor(s) in interest or affiliate(s), and is authorized to do business,
20 and was and is doing business, in California. The State of California has alleged
21 that Plaintiff Quemetco, Inc., or its corporate predecessor(s) in interest or
22 affiliate(s), arranged for the disposal of a Hazardous Substance at the BKK Class I
23 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
24 9607(a). Plaintiff Quemetco, Inc. is a member of the BKK Working Group and as a
25 member of the BKK Working Group has incurred costs, including response costs
26 consistent with the NCP, at the BKK Class I Facility.

27 47. Plaintiff Rockwell Automation, Inc. is a corporation organized under
28 the laws of the State of Delaware. At all times referred to herein, Rockwell

1 Automation, Inc., or its corporate predecessor(s) in interest or affiliate(s), was and
2 is authorized to do business, and was and is doing business, in California. The
3 State of California has alleged that Plaintiff Rockwell Automation, Inc. , or its
4 corporate predecessor(s) in interest or affiliate(s), arranged for the disposal of a
5 Hazardous Substance at the BKK Class I Facility, as those terms are described in
6 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Rockwell Automation,
7 Inc. is a member of the BKK Working Group and as a member of the BKK
8 Working Group has incurred costs, including response costs consistent with the
9 NCP, at the BKK Class I Facility.

10 48. Plaintiff Rohm & Haas Company is a corporation organized under the
11 laws of the State of Delaware. At all times referred to herein, Rohm & Haas
12 Company, or its corporate predecessor(s) in interest or affiliate(s), was and is
13 authorized to do business, and was and is doing business, in California. The State
14 of California has alleged that Plaintiff Rohm & Haas Company, or its corporate
15 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
16 Substance at the BKK Class I Facility, as those terms are described in section
17 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Rohm & Haas Company is a
18 member of the BKK Working Group and as a member of the BKK Working Group
19 has incurred costs, including response costs consistent with the NCP, at the BKK
20 Class I Facility.

21 49. Plaintiff Rohr, Inc. is a corporation organized under the laws of the
22 State of Delaware. At all times referred to herein, Rohr, Inc., or its corporate
23 predecessor(s) in interest or affiliate(s), was and is authorized to do business, and
24 was and is doing business, in California. The State of California has alleged that
25 Plaintiff Rohr, Inc. arranged for the disposal of a Hazardous Substance at the BKK
26 Class I Facility, as those terms are described in section 107(a) of CERCLA, 42
27 U.S.C. § 9607(a). Plaintiff Rohr, Inc. is a member of the BKK Working Group and
28

1 as a member of the BKK Working Group has incurred costs, including response
2 costs consistent with the NCP, at the BKK Class I Facility.

3 50. Plaintiff San Diego Gas & Electric Company is a corporation
4 organized under the laws of the State of California. At all times referred to herein,
5 San Diego Gas & Electric Company, or its corporate predecessor(s) in interest or
6 affiliate(s), was and is authorized to do business, and was and is doing business, in
7 California. The State of California has alleged that Plaintiff San Diego Gas &
8 Electric Company arranged for the disposal of a Hazardous Substance at the BKK
9 Class I Facility, as those terms are described in section 107(a) of CERCLA, 42
10 U.S.C. § 9607(a). Plaintiff San Diego Gas & Electric Company, or its corporate
11 predecessor(s) in interest or affiliate(s), is a member of the BKK Working Group
12 and as a member of the BKK Working Group has incurred costs, including
13 response costs consistent with the NCP, at the BKK Class I Facility.

14 51. Plaintiff Smith International, Inc. is a corporation organized under the
15 laws of the State of California. At all times referred to herein, Smith International,
16 Inc. , or its corporate predecessor(s) in interest or affiliate(s), was and is authorized
17 to do business, and was and is doing business, in California. The State of
18 California has alleged that Plaintiff Smith International, Inc., or its corporate
19 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
20 Substance at the BKK Class I Facility, as those terms are described in section
21 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Smith International, Inc. is a
22 member of the BKK Working Group and as a member of the BKK Working Group
23 has incurred costs, including response costs consistent with the NCP, at the BKK
24 Class I Facility

25 52. Plaintiff Southern California Edison Company is a corporation
26 organized under the laws of the State of California. At all times referred to herein,
27 Southern California Edison Company, or its corporate predecessor(s) in interest or
28 affiliate(s), was and is authorized to do business, and was and is doing business, in

1 California. The State of California has alleged that Plaintiff Southern California
2 Edison Company, or its corporate predecessor(s) in interest or affiliate(s), arranged
3 for the disposal of a Hazardous Substance at the BKK Class I Facility, as those
4 terms are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff
5 Southern California Edison Company is a member of the BKK Working Group and
6 as a member of the BKK Working Group has incurred costs, including response
7 costs consistent with the NCP, at the BKK Class I Facility.

8 53. Plaintiff Southern California Gas Company is a corporation organized
9 under the laws of the State of California. At all times referred to herein, Southern
10 California Gas Company, or its corporate predecessor(s) in interest or affiliate(s),
11 was and is authorized to do business, and was and is doing business, in California.
12 The State of California has alleged that Plaintiff Southern California Gas Company,
13 or its corporate predecessor(s) in interest or affiliate(s), arranged for the disposal of
14 a Hazardous Substance at the BKK Class I Facility, as those terms are described in
15 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Southern California Gas
16 Company is a member of the BKK Working Group and as a member of the BKK
17 Working Group has incurred costs, including response costs consistent with the
18 NCP, at the BKK Class I Facility.

19 54. Plaintiff Stauffer Management Company LLC is a limited liability
20 corporation organized under the laws of the State of Delaware. At all times referred
21 to herein, Stauffer Management Company LLC, or its corporate predecessor(s) in
22 interest or affiliate(s), was and is authorized to do business, and was and is doing
23 business, in California. Stauffer Management Company LLC is a contractual
24 indemnitor of Bayer CropScience, Inc., and through this legal obligation, has paid
25 the costs incurred by Bayer CropScience, Inc. and has participated in directing
26 remediation efforts as an agent for Bayer CropScience, Inc. at the BKK Class I
27 Facility. Stauffer Management Company LLC also is an assignee to the
28 subrogation and other rights or causes of action Syngenta Crop Protection, LLC, a

1 Delaware limited liability company, may have as a result of reimbursements it has
2 made to Stauffer Management Company LLC for costs paid for by Stauffer
3 Management Company LLC in connection with the BKK Class I Facility. Prior to
4 filing this lawsuit, Bayer CropScience, Inc. and Stauffer Management Company
5 LLC submitted demands to Defendants as contemplated by CERCLA § 112(b) and
6 (c), thereby making them each a “claimant” as that term is used in the statute.
7 Although Stauffer Management Company LLC and Syngenta Crop Protection, LLC
8 are not members of the BKK Working Group, because the costs they have incurred
9 result directly from Bayer CropScience’s participation in the BKK Working Group,
10 for purposes of the allegations in this Sixth Amended Complaint relating to the
11 incurrence of costs, the term “BKK Working Group” includes Stauffer
12 Management Company LLC and Syngenta Crop Protection, LLC.

13 55. Plaintiff The Procter & Gamble Manufacturing Company is a
14 corporation organized under the laws of the State of Ohio. At all times referred to
15 herein, The Procter & Gamble Manufacturing Company, or its corporate
16 predecessor(s) in interest or affiliate(s), was and is authorized to do business, and
17 was and is doing business, in California. The State of California has alleged that
18 Plaintiff The Procter & Gamble Manufacturing Company, or its corporate
19 predecessor(s) in interest or affiliate(s), arranged for the disposal of a Hazardous
20 Substance at the BKK Class I Facility, as those terms are described in section
21 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff The Procter & Gamble
22 Manufacturing Company is a member of the BKK Working Group and as a
23 member of the BKK Working Group has incurred costs, including response costs
24 consistent with the NCP, at the BKK Class I Facility.

25 56. Plaintiff THUMS Long Beach Company is a corporation organized
26 under the laws of the State of Delaware. At all times referred to herein, THUMS
27 Long Beach Company, or its corporate predecessor(s) in interest or affiliate(s), was
28 and is authorized to do business, and was and is doing business, in California. The

1 State of California has alleged that Plaintiff THUMS Long Beach Company, or its
2 corporate predecessor(s) in interest or affiliate(s), arranged for the disposal of a
3 Hazardous Substance at the BKK Class I Facility, as those terms are described in
4 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff THUMS Long Beach
5 Company is a member of the BKK Working Group and as a member of the BKK
6 Working Group has incurred costs, including response costs consistent with the
7 NCP, at the BKK Class I Facility.

8 57. Plaintiff Union Carbide Corporation is a corporation organized under
9 the laws of the State of New York. At all times referred to herein, Union Carbide
10 Corporation, or its corporate predecessor, was and is authorized to do business, and
11 was and is doing business, in California. The State of California has alleged that
12 Plaintiff Union Carbide Corporation, or its corporate predecessor(s) in interest or
13 affiliate(s), arranged for the disposal of a Hazardous Substance at the BKK Class I
14 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
15 9607(a). Plaintiff Union Carbide Corporation is a member of the BKK Working
16 Group and as a member of the BKK Working Group has incurred costs, including
17 response costs consistent with the NCP, at the BKK Class I Facility.

18 58. Plaintiff Union Pacific Railroad (formerly known as Southern Pacific
19 Transportation Company) is a corporation organized under the laws of the State of
20 Delaware. At all times referred to herein, Union Pacific Railroad, or its corporate
21 predecessor(s) in interest or affiliate(s), was and is authorized to do business, and
22 was and is doing business, in California. The State of California has alleged that
23 Plaintiff Union Pacific Railroad, or its corporate predecessor(s) in interest or
24 affiliate(s), arranged for the disposal of a Hazardous Substance at the BKK Class I
25 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
26 9607(a). Plaintiff Union Pacific Railroad is a member of the BKK Working Group
27 and as a member of the BKK Working Group has incurred costs, including
28 response costs consistent with the NCP, at the BKK Class I Facility.

1 59. Plaintiff United States Steel Corporation is a corporation organized
2 under the laws of the State of Delaware. At all times referred to herein, United
3 States Steel Corporation, or its corporate predecessor(s) in interest or affiliate(s),
4 was and is authorized to do business, and was and is doing business, in California.
5 The State of California has alleged that Plaintiff United States Steel Corporation, or
6 its corporate predecessor(s) in interest or affiliate(s), arranged for the disposal of a
7 Hazardous Substance at the BKK Class I Facility, as those terms are described in
8 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff United States Steel
9 Corporation is a member of the BKK Working Group and as a member of the BKK
10 Working Group has incurred costs, including response costs consistent with the
11 NCP, at the BKK Class I Facility.

12 60. Plaintiff RTX Corporation is a corporation organized under the laws of
13 the State of Delaware. At all times referred to herein, RTX Corporation, or its
14 corporate predecessor(s) in interest or affiliate(s), was and is authorized to do
15 business, and was and is doing business, in California. The State of California has
16 alleged that Plaintiff RTX Corporation, or its corporate predecessor(s) in interest or
17 affiliate(s), arranged for the disposal of a Hazardous Substance at the BKK Class I
18 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
19 9607(a). Plaintiff RTX Corporation is a member of the BKK Working Group and
20 as a member of the BKK Working Group has incurred costs, including response
21 costs consistent with the NCP, at the BKK Class I Facility.

22 61. Plaintiff Univar Solutions USA LLC (f/k/a Univar Solutions USA Inc.
23 and Van Waters & Rogers) is a corporation organized under the laws of the State of
24 Washington. At all times referred to herein, Univar Solutions USA LLC, or its
25 corporate predecessor(s) in interest or affiliate(s), was and is authorized to do
26 business, and was and is doing business, in California. The State of California has
27 alleged that Plaintiff Univar Solutions USA LLC , or its corporate predecessor(s) in
28 interest or affiliate(s), arranged for the disposal of a Hazardous Substance at the

1 BKK Class I Facility, as those terms are described in section 107(a) of CERCLA,
2 42 U.S.C. § 9607(a). Plaintiff Univar Solutions USA LLC is a member of the BKK
3 Working Group and as a member of the BKK Working Group has incurred costs,
4 including response costs consistent with the NCP, at the BKK Class I Facility.

5 62. Plaintiff Ameron International Corporation is a corporation organized
6 under the laws of the State of Delaware. At all times referred to herein, Ameron
7 International Corporation, or its corporate predecessor(s) in interest or affiliate(s),
8 was and is authorized to do business, and was and is doing business, in California.
9 The State of California has alleged that Plaintiff Ameron International Corporation,
10 or its corporate predecessor(s) in interest or affiliate(s), arranged for the disposal of
11 a Hazardous Substance at the BKK Class I Facility, as those terms are described in
12 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Ameron International
13 Corporation is a member of the BKK Working Group and as a member of the BKK
14 Working Group has incurred costs, including response costs consistent with the
15 NCP, at the BKK Class I Facility.

16 63. Plaintiff Xerox Corporation is a corporation organized under the laws
17 of the State of New York. At all times referred to herein, Xerox Corporation, or its
18 corporate predecessor(s) in interest or affiliate(s), was and is authorized to do
19 business, and was and is doing business, in California. The State of California has
20 alleged that Plaintiff Xerox Corporation, or its corporate predecessor(s) in interest
21 or affiliate(s), arranged for the disposal of a Hazardous Substance at the BKK Class
22 I Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
23 9607(a). Plaintiff Xerox Corporation is a member of the BKK Working Group and
24 as a member of the BKK Working Group has incurred costs, including response
25 costs consistent with the NCP, at the BKK Class I Facility.

DEFENDANTS

1
2 64. Defendants are: 1700 Santa Fe Ltd; A & H Plating Inc.; A & Z
3 Decasing Co.; A. C. Barrel & Drum; A. D. Service Publications; A. J. Daw Printing
4 Ink Corp; A-Best Assembly & Distribution Warehouse, Inc.; Accent General;
5 Accurate Plating Co.; Ace Plating Co.; Action Computer Products Inc.; Advance
6 Galvanizing Co.; Advance Gear & Machine Corp.; Advance Pipe Products;
7 Aerodynamic Plating Co.; Aetna Metals Co.; Airstream of CA; Ajax Hardware
8 Corp.; Albert Van Luit & Co.; AlCo-Gravure Inc.; All Valley Plating Co. Inc.;

9 Allesandro Automatic Inc.; Allied Cleaning Specialists Inc.; Allyn Transportation
10 Co.; Alum-A-Coat Inc.; Aluminum Forge Division of APP; Alumtreat Inc.; Amco
11 Manufacturing Corp.; American Drawn Steel; American Environmental LLC;
12 American Marble & Onyx Inc.; American Ocean Tile; American Safety Equipment
13 Co.; Ameroil; AmexDrug Corporation; Anaplex Corp.; Anchor Hocking Corp.;

14 Anderson Lithograph; Anodart; Apex Drum Co.; Apodaca & Sons Plating Co.;

15 Aquarius Vacuum Truck Service; Arrow Plating Co.; Artesia Door; Artistic
16 Polishing & Plating Inc.; Asbestos Claims Management Corporation; Asbestos
17 Clean-Up & Consultants; Asbestos Residential Blanket Number; Associated Diesel;

18 Associated Pacific; Associated Plating Co.; Associated Plating Company, Inc.;

19 Astro Pak Corp.; Atlas Coverall & Supply; Atlas Lighting Co.; Automotive Battery
20 Prod Co.; Aviation Power Supply; Azusa Salvage Co.; B. & B. Pipe & Tool Co.; B.
21 & C. Plating Co.; Baker Consultants Inc.; Barron Plating Co.; Barry L. Miller
22 Engineering Co. Inc.; Bay Decking Co. Inc.; Bear Paw Mining; Bell Industries;

23 Bennett Industries; Beren Corp.; Bergandi Manufacturing Co. Inc.; Berk Oil Co.;

24 Berns Co.; Best Washington Uniform Supply; Betty Glaser Investment Co.; Beylik
25 Drilling; Bingo Truck Stop; Blackfoot-Cherokee Energy Inc.; Bliss & Laughlin
26 Steel Co.; Block Oil Co.; Blue Seal Linen Supply; Bob Muller Auto; Bob's Plating;

27 Bobil Motor Products Inc.; Bock Co.; Bonanza Aluminum Inc.; Bortz Oil Co.; Boss
28 Uniforms; Brayton Oil; Brea Canyon Oil Co.; Brite Sol Inc.; Brogdex Corp.; BTJ

1 Construction; Buck Does It Inc.; Buds Oil Service Inc.; Bumper Shop; Bumperline
2 Inc.; Burbank Plating Service Corp.; Burbank Unified School District; Burke Co.;
3 Burton Plating Co.; C. & W. Chemicals Co. Inc.; C. M. Dodson Oil; Cadet Uniform
4 & Linen Supply Co.; Cal Bumper Co.; Cal Chrome; Cal Metals; Califoil Inc.;
5 California Corrugated Ind.; California Finished Metals Inc.; California Metal
6 Enameling Co.; California Motor Express; California Ship Building; California
7 Target Enterprises; California Technical Plating Corp.; Cal-Mold Inc.; Calpro Co.;
8 Cal-West Circuits Inc.; Calzona Transportation; Cannel & Chaffin Co.; Capri
9 Pumping Service; Capro Oil Co.; Carlsberg Management; Carter Precision Parts
10 Inc.; Cascade Die Casting Group Inc.; Casden Co.; Caspian Inc.; Cast Metal
11 Finishing; CBC Industries; Cedargreen Refining Co.; Cedko Electronics; Celotex
12 Corp.; Central Industrial Engineering; Central Insulation Corp.; Central Plants Inc.;
13 Century Phoenix Laminators Inc.; Certified Grocers of Cal.; Chacon Chemical
14 Corp.; Challenge Cook Bros; Champion Power Wash; Charles Bruning Co.; Chem
15 Arrow Corp.; Chem Etch Corp.; Chem West Industries Inc.; Chemical Co.;
16 Chemical Energy; Chemical Machining Corp.; Chemical Milling International;
17 Chemoil Corp.; Chemoil Refining Corp.; Chemplate Corp.; Chemron Corp.;
18 Chemware; Chick Sales Plating Corp.; Chino Valley Galvanizing Co.; CHB Foods;
19 Chromalloy Corporation; Chrome Crankshaft Co.; Chromizing Co.; Circuit
20 Industries; City of Carson; City of Riverside; City of San Diego; Clayton
21 Manufacturing Co.; Clean Steel Inc.; Cleaning Dynamics Corp.; Climax Tube
22 Corp.; Coast Contractors; Collins General Contractors; Columbia Metal Finishing
23 Inc.; Columbine & Associates; Commercial Chemical Co. Inc.; Commercial
24 Cleaning Corp.; Commercial Truck Bodies; Computer Automation; Conejo Valley
25 Unified School District; Conexx Oil; Connector Service Corp.; Conrac Corp.;
26 Conrock Co.; Consolidated Auto; Container Supply Co.; Contempo Furniture;
27 Continental Chemical Corp.; Continental Forest Industries; Continental Forest
28 Industries, Inc.; Continental Polymers Inc.; Control Circuits; Control Plating Co.

1 Inc.; Cooper LA Clear Drum Co.; Corrosion Technology Inc.; Cosmotronics Co.;
2 Coto De Caza Development Corp.; Covestro LLC; Crane & Utterback Inc.; Crane-
3 Hydroaire Division; Crescent Transportation; Cut-Off Manifest; CWOD; Cyclone
4 Excelsweld Co.; Torrance Tubing and Conduit Company, formerly known as
5 Cyprus Tubing & Conduit Co.; D. E. Calta International; D. W. Elliott Inc.;
6 Damson Oil Co.; Darling Ingredients; Darrell Thompson Tank & Construction;
7 Data Circuits Inc.; Dave Beck; Davidson Panel Co.; Davis Walker Co.; Dayton
8 Granger Inc.; G.L.C. Building Corp., formerly known as Del Amo Energy; D.I.
9 Salvo Trucking; Dial Precision Inc.; Diamond Plastics; Dibble Electronics Inc.;
10 Ditronics Inc.; Ditty Drum Co.; Dominguez Properties; DME Co.; Downey Glass
11 Co. Inc.; Draft Systems Inc.; Drilube Co.; Dubois Chemical Co.; Dyanco Inc.; Dyer
12 He Inc.; Dyna Plate Inc.; Dyna Shield Inc.; E. & M. Builders; East Los Angeles
13 College; Eco Petroleum Inc.; Ecology Control Industries; Edmund Grey; Eeco
14 Inc.; El Castillo Real Restaurant; El Monte Lead Salvage Co. Inc.; El Monte Tool
15 & Die; Electra Motors; Electro Adapter Inc.; Electron Plating; Electronic Plating
16 Service Inc.; Electronic Reclamation Service; Energy Production & Sales; Engard
17 Coatings Corp.; Environmentals Inc.; ESB Inc.; Eskimo Radiator Manufacturing
18 Co.; Estee Battery Co.; Everest & Jennings Co. Inc.; Faith Plating Co.; Fansteel
19 Precision Sheet Metal; Fela Management AG; Fela Precision Inc.; FG Group
20 Holdings Inc.; First National Finance Corp.; Fix & Brain Vacuum Truck Service;
21 Flask Chemical; Flintkote Co.; Flynn's Plating Co.; Fontana Truck Wash; Forro
22 Precision Co.; Fortin Laminating Corp.; Four Star Chemical Co.; Four Star
23 Container Inc.; Four Star Disposal Co.; Freeborn Equipment Co. Inc.; Fresno
24 Unified School District; Frontier Commodore Inc.; Frontier Container Corp.;
25 Fullerton Joint Union School District; G. R. Nance Co. Inc.; G. T. Bicycles Inc.;
26 Gainey Ceramics; Gardena Plating Co.; Garhauer Marine Corp.; Garrett Research;
27 Gel Industries, Inc.; Genes Plating & Spectrum Co.; George Industries Inc.; Gerard
28 Metal Craftsmen Inc.; Gillespie Furniture Manufacturing; Gilmore Envelope Corp.;

1 Glass Arts; Glen Air Inc.; Glendale Unified School District; Globe Meat Packing;
2 Gold Bond Building Products; Gold Pack Meat Co.; Golden West Airlines; Golden
3 Wool Co.; Good Tables Inc.; GPS Industries; Graphic Research Inc.; Gravure
4 West; Greer Products; Grefco Inc.; Gregg Industries Inc.; Grindley Manufacturing
5 Inc.; Grover Products Co.; H. & A. Plating Co.; H. & C. Disposal; H. H. Robertson
6 Co.; H. Krasne Manufacturing Co. Inc.; Hall Heat Treating Co.; Hamilton
7 Construction Co.; Hampton Oil Co.; Hanks Service Station Maintenance Inc.;
8 Harland M. Brown & Co.; Harlyn Products Inc.; Harpers of California; Harris Tube
9 Inc.; Hartley Co.; Hartwell Corp.; Headnall Inc.; Heads Up Industries; Hercules Oil
10 Co.; Hermetic Systems Inc.; Highland Plating Co.; Hines Wholesale Nurseries; Hi-
11 Production Forge Co.; Homexx International Corp.; Hordis Brothers; Hoya Lens of
12 America Inc.; Huffman Manufacturing Co.; Huntington Signal Oil Co.; Huntington
13 Tile Inc., Huntmix Inc.; Ibis Systems Inc.; Ideal Uniform; Imperial Metals Corp. of
14 America; Inca Products Co.; Inco United States Inc.; Industrial Asphalt; Industrial
15 Insulators & Supply Inc.; Industrial International Corp.; Industrial Rubber Cement
16 Co. Inc.; Industrial Uniform; Industrial Waste Engineering; City of Inglewood;
17 Inland Shopping Center; Innovated Electronics; International Decoratives Inc.;
18 International Extrusion Corp.; Investment Recovery Services Inc.; Irvine Ranch
19 Water District; Isaac Cohen & Son Metals; ITT Courier Terminal Systems Inc.; J.
20 & S. Chrome Plating Co. Inc.; J. & S. Laboratories Inc.; J. H. Baxter; J. L. Jones &
21 Co.; J. W. Carrol & Sons; Jacat Oil Co.; Jack B Kelley LLC; Jack Cline; Jay Die
22 Casting; Jaybee Manufacturing Corp.; Jenkins Oil Co. Inc.; Jennings Plating Co.
23 Inc.; Jerrald Properties; Jerry Goodwill; Jetronic Industries Inc.; JMB Property
24 Management; John D. Lusk & Sons; Jorco Inc.; K. L. Redfern Construction Co.;
25 Kag Merchant Gas Group; Kaiser Pipes & Casing; Kay Brunner; Keeco; Keller
26 Street Development Co.; Kelley Manufacturing Co.; Kellogg & Son Drilling Co.;
27 Ken-Air Inc.; Kenetex Chemicals; Kern Foods Inc.; Ketema Aluminum Extrusion;
28 Keystone Products Inc.; Kimco Manufacturing Inc.; Kinsbursky Brothers Supply

1 Inc.; Kirkhill Inc.; Klear Pak; KLM Oil Co.; Knappe & Vogt Manufacturing;
2 Koboway; Koch Asphalt Co. Oil; Korody Colyer Corp.; Kulberg Development
3 Corp.; L. & L. Tank Lines Inc.; La Fon Equipment Co.; La Victoria Foods;
4 Lubricating Specialties;⁴ Lackawanna Leather; Lakewood Oil Service Inc.; Lamin
5 Arts; Lamination Technology Inc.; Langlois Flour Co.; Larry Fricker Co. Inc.;
6 Latchford Glass Co.; Le Fiell Manufacturing Co.; Leach Corp.; Lear Siegler Inc.;
7 Lee Pharmaceuticals Bronco Enterprises; Lewis Foods; Life Paint Corp.; Lockhart
8 Industries; Long & Co.; Long Beach Oil Development Co.; Long Beach Plating
9 Co.; Los Angeles Community College District; Los Angeles Screw Products Inc.;
10 Los Angeles Tanning Co.; Lubrication Co. of America; Lundeen Inc.; Lundeen Rail
11 Car Repair Service; Lyco Food Products; Lyle Van Patten Co. Inc.; M. P.
12 McCaffrey Inc.; M. Slayen & Associates; M. V. Japan Canela; Macmillan Oil Co.;
13 Magna Mill Prod.; Maness Excavating; Marbeth Chemical Co.; Marcrest Pacific
14 Co. Inc.; Marina Pacifica; Mark Industries; Marlex Oil & Refining Inc.; Marmac
15 Resource Co.; Marquadt Co.; Marquis Industries; Master Fence Fittings; Master
16 Products Manufacturing Co.; Mayon Foods; McAlmond Oil & Gas; McAuley Oil
17 Co.; McCulloch Corp.; McCurdy Circuits; McMahan Development;
18 McNottingham Co. of Southern California; Menasha Corp.; Merit Oil Co.; Metal
19 Treaters Inc.; Metlox Pottery; Metropolitan Circuits Inc.; Miller Dial Corp.; Milo
20 Equipment Co.; Mission Plating Co.; Modern Coatings Inc.; Modern Plating Co.;
21 Modine Manufacturing Co.; Mola Development Corporation; Monitor Plating &
22 Anodizing; Monogram/Peacock Manufacturing; Motor Processors Inc.; MPC
23 Industries; Mustang Equipment Co.; Nardon Manufacturing Co. Inc.; National
24 Paint & Varnish Co. Inc.; National Standard Co.; National Technology; Nattier
25 Manufacturing Co.; Nelco Oil Refining Corp.; New Bastion Development, Inc.

26 _____
27 ⁴ The original name of this entity was Labricating Specialties; however, the name
28 was changed to *Lubricating* Specialties on the most recently signed, now
terminated, tolling agreement.

1 Newhall Refining Co. Inc.; Newport Electronics Inc.; Nordskog Co. Inc.; Norman
2 High Demolition; Northern Telecom; Norton & Son of California Inc.; Now
3 Construction Corp.; Nu Way Plating Co. Inc.; Oil Co.; Oilfields Trucking Co.; Oil
4 Well Service Co.; Olmstead Trucking; Olympic Plating & Polishing Inc.; Omar
5 Industries; Omega Oil Co. Inc.; Ontario Auto Truck Plaza; Orange Coast Plating
6 Inc.; Orange County Dust Control Inc.; Orange County Electronics Corp.; Orange
7 Heights Orange Association; Orange Co. Machine Works; Orange Precision
8 Circuits; Orchids Paper Products Co.; Ozalid Corp.; Ozite Corporation; P. C. World
9 Orange County; P. W. Stephens Contractors Inc.; Pacific Airmotive Corp.; Pacific
10 Coast Warehouse Corp.; Pacific Engine; Pacific Financial Center; Pacific Oasis;
11 Pacific Precision Metals; Pacific Press; Pacific Treatment Corp.; Pacific Tube Co.;
12 Pacific Vacuum Truck Co.; Pacific Valves; Pacifica Plating Inc.; Pactra Co.; Palace
13 Plating Co.; Pan Western Oil Co.; Park Metal Co.; Parsley & Kennedy; Pascoe
14 Building Systems; PCA Metal Finishing Inc.; Pease & Curren Reliable Recovery
15 Inc.; Pembina; Pepper Industries Inc.; Perlite Processing; Permalab Equipment
16 Corp.; Peterson Manufacturing Co. Inc.; Petro Lewis Corp.; Petrochemicals Co.
17 Inc.; Phototron Corp.; Pichel Industries Inc.; PL Porter Co.; Plastic Dress-Up Corp.;
18 Poly Disc System Inc.; Polyester Hutco Group; Polymer Development Labs Inc.;
19 Post Transportation Co.; Powerline Sales; PQ Corporation; Pre Recording Co.;
20 Precipitator Inc.; Precision Anodizing & Plating Inc.; Precision Heat Treating Co.;
21 Premiere Alum. Prod. Inc.; President Lincoln; Process Technology Co.; Production
22 Plating Co.; Products Engineering Corp.; Prototech Circuitry; PSI West; PTM & W
23 Industries Inc.; Punch Press Products; PVO International; Quality Aluminum Forge
24 Co.; Quality Farms; Quality Metal Finishing Co.; Quality Sprayers Inc.; R. & E.
25 Plating Co.; R. & R. Industrial Waste Haulers Inc.; R. G. Wallace Co. Inc.;
26 Rainbow Trucking Co.; Rayne Water Systems; Real Property West Inc.; Rebel Oil
27 Co. Inc.; Redi-Strip Co. Inc.; Redondo Oil Co.; Refiners Marketing Co.; Reliable
28 Recovery Inc.; Rentokil North America, Inc.; Renu Plating Co. Inc.; Revere

1 Extruders Inc.; Rex Precision Products Inc.; Rexart Corp.; Rheem Metals Inc.; Rho
2 Chem Corp.; RHS Carpet Mill; Richardson & Holland; Richlynn Technology Inc.;
3 Rinchem Co. Inc.; Riverside Cement Co.; Robert Keith & Co. Inc.; Rocket
4 Industries; Rodding Cleaning Service; Roehl Disposal Services; Rohrig Brothers;
5 Ronald M. Jones; Ronson Hydraulic Corp.; Rose Hills Memorial Park Association;
6 Rosens Elect. Equip. Co.; Rotary Offset Printers; Routh Transportation; Royal
7 Plating Works; Rupes Hydraulics; Russell Burdsall & Ward Inc.; Rutherford Oil
8 Co.; S. Rose Cooperage; S. T. & I. Inc.; Safetran Systems Corp.; Sals Plating; San
9 Fernando Electric Manufacturing Co.; Santa Ana Diesel; Santa Monica College;
10 Schlitz Brewing Co.; Scovill Inc.; SCS Industries; Sea Lift Maritime; Security
11 Environmental Systems; Shafco Industries Inc.; Shasta Pan Oil Co.; Sierra Pacific
12 Container Corp.; Singer Aerospace; Snow Summit Ski Corp.; SoCal Finishing Co.;
13 Soco West, Inc.; Solutia Inc.; Sonic Plating Co.; Southern California Waste
14 Reduction; Soule Steel Co.; South Coast County Water District; Southern
15 California Drum Co.; Southwest Aircraft Services; Southwest Metal Co.;
16 Southwest Petro Chemical; Southwest Processors Inc.; Southwestern Alloys Inc.;
17 Space Ordinance Systems; Specific Plating Co. Inc.; Spectrum Chemical
18 Manufacturing Inc.; Spirit Silkscreen; Ssp Construction Equipment Inc.; Standard
19 Brands Paint Co. Inc.; Standard Crankshaft Inc.; Standard Felt Co.; Standard Nickel
20 Chromium Plating; Standun Inc.; Stang Hydronics; Star Nameplate Co.; Statewide
21 Environmental Services; Stephen C. Groat Development; Steponovich & Long;
22 Steverson Bros; Stinnes Western Chemical Corp.; Summit Ink Co.; Super Tech;
23 Superchrome Engineering Co.; Superior Industrial Pumping; Superior Pacific
24 Galvanizing Co.; Superior Plating; Supracote Inc.; Synres Chemical Corp.; Systems
25 Furniture Co.; T. P. Hearne Co.; Tac Aluminum Processing; Target Chemical Co.;
26 Tarnutzer Venture; Teal Industries; Texas Polymers; Textile Rubber & Chemical
27 Co.; Thatcher Glass; Thompson Tank Construction; Textured Coatings; Thrifty
28 Mart Co.; Thrifty Oil Co.; Timco; Titech International Inc.; TMC Properties LLC;

1 Tool & Jig Plating; Torrance Business Park; Trans Harbor Service; Trent Tube Co.;
2 Trewax Co.; Tri-County Insulation Co. Inc.; Triad Marine & Industrial Cleaning;
3 Trimm Industries; Trimm Technologies, Inc.; Tubing Seal Cap Co.; U.S.
4 Prefinished Metals; Union Manufacturing Co.; Union Packing; Union Tribune
5 Publishing Co.; Unitog Rental Services Inc.; Universal Circuits Inc.; Universal
6 Molding Company; Universal Paint Corp.; USA Petroleum; V&M Precision
7 Grinding; Val Circuits Inc.; Valley Brake Bond Co. Inc.; Valley Friction Materials;
8 Van Der Horst Corp.; Vernon Leather Co.; Visitron Corp.; Voi Shan; W. L.
9 Chapman Co.; W. S. Hatch Co.; W. W. Irwin Co.; Warners Dead Stock; Waterfront
10 Services; Waymire Drum Co. Inc.; Weber Metals Inc.; Well Tech Inc.; Wescal
11 Industries; West American Rubber; Western Circuits; Western Dyeing & Finishing;
12 Western Electroplating Inc.; Western Galvanizing Co.; Western Metals Corp.;
13 Western Oil & Refining Co. Inc.; Western Rebuilder Inc.; Western Specialty
14 Coatings Co.; Western States Refining; Western Wheel Manufacturing Co.;
15 Westway Terminal Co. Inc.; Wheel Service Group Inc.; Whitcomb Plating Inc.;
16 Whitworth Inc.; Whitfield Tank Lines; Whittier Chrome & Plating; Wilcor Inc.;
17 Wilmington Liquid Bulk; Wilshire Industries; Winchester Inn; Winonics Inc.;
18 Wyndham Manufacturing Co. Inc.; Xidex Corp.; Zapata Construction Inc.; Zero
19 Corp.; Zolatone Process Inc.; Zonver Drilling; City of Baldwin Park; City of
20 Fontana; City of Gardena; City of Pomona; City of Whittier; and Does 1-10.

21 65. According to historical BKK Corp. records, Defendant 1700 Santa Fe
22 Ltd, and its successors and/or predecessors, contributed manifested waste to the
23 BKK Class I Facility. This manifested waste contained Hazardous Substances that
24 Defendant 1700 Santa Fe Ltd generated and/or arranged for its disposal at the BKK
25 Class I Facility. To date, Defendant 1700 Santa Fe Ltd has not incurred any costs
26 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
27 Plaintiffs at the BKK Class I Facility.

28

1 66. According to historical BKK Corp. records, Defendant A & H Plating
2 Inc., and its successors and/or predecessors, contributed manifested waste to the
3 BKK Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant A & H Plating Inc. generated and/or arranged for its disposal at the
5 BKK Class I Facility. To date, Defendant A & H Plating Inc. has not incurred any
6 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
7 the Plaintiffs at the BKK Class I Facility.

8 67. According to historical BKK Corp. records, Defendant A & Z
9 Decasing Co., and its successors and/or predecessors, contributed manifested waste
10 to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant A & Z Decasing Co. generated and/or arranged for its
12 disposal at the BKK Class I Facility. To date, Defendant A & Z Decasing Co. has
13 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
14 costs incurred by the Plaintiffs at the BKK Class I Facility.

15 68. According to historical BKK Corp. records, Defendant A. C. Barrel &
16 Drum, and its successors and/or predecessors, contributed manifested waste to the
17 BKK Class I Facility. This manifested waste contained Hazardous Substances that
18 Defendant A. C. Barrel & Drum generated and/or arranged for its disposal at the
19 BKK Class I Facility. To date, Defendant A. C. Barrel & Drum has not incurred
20 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
21 by the Plaintiffs at the BKK Class I Facility.

22 69. According to historical BKK Corp. records, Defendant A. D. Service
23 Publications, and its successors and/or predecessors, contributed manifested waste
24 to the BKK Class I Facility. This manifested waste contained Hazardous
25 Substances that Defendant A. D. Service Publications generated and/or arranged for
26 its disposal at the BKK Class I Facility. To date, Defendant A. D. Service
27 Publications has not incurred any costs at the BKK Class I Facility nor has it paid
28 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 70. According to historical BKK Corp. records, Defendant A. J. Daw
2 Printing Ink Corp, and its successors and/or predecessors, contributed manifested
3 waste to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant A. J. Daw Printing Ink Corp generated and/or arranged
5 for its disposal at the BKK Class I Facility. To date, Defendant A. J. Daw Printing
6 Ink Corp has not incurred any costs at the BKK Class I Facility nor has it paid its
7 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

8 71. Upon information and belief, Defendant A-Best Assembly &
9 Distribution Warehouse, Inc. is the successor to Defendant Jerry Goodwill and/or
10 otherwise liable for manifested waste that was contributed to the BKK Class I
11 Facility by Defendant Jerry Goodwill. According to historical BKK Corp. records,
12 Defendant Jerry Goodwill contributed manifested waste to the BKK Class I
13 Facility. This manifested waste contained Hazardous Substances that Defendant
14 Jerry Goodwill generated and/or arranged for its disposal at the BKK Class I
15 Facility. To date, Defendant A-Best Assembly & Distribution Warehouse, Inc. has
16 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
17 costs incurred by the Plaintiffs at the BKK Class I Facility.

18 72. According to historical BKK Corp. records, Defendant Accent
19 General, and its successors and/or predecessors, contributed manifested waste to the
20 BKK Class I Facility. This manifested waste contained Hazardous Substances that
21 Defendant Accent General generated and/or arranged for its disposal at the BKK
22 Class I Facility. To date, Defendant Accent General has not incurred any costs at
23 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
24 Plaintiffs at the BKK Class I Facility.

25 73. According to historical BKK Corp. records, Defendant Accurate
26 Plating Co., and its successors and/or predecessors, contributed manifested waste to
27 the BKK Class I Facility. This manifested waste contained Hazardous Substances
28 that Defendant Accurate Plating Co. generated and/or arranged for its disposal at

1 the BKK Class I Facility. To date, Defendant Accurate Plating Co. has not incurred
2 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
3 by the Plaintiffs at the BKK Class I Facility.

4 74. According to historical BKK Corp. records, Defendant Ace Plating
5 Co., and its successors and/or predecessors, contributed manifested waste to the
6 BKK Class I Facility. This manifested waste contained Hazardous Substances that
7 Defendant Ace Plating Co. generated and/or arranged for its disposal at the BKK
8 Class I Facility. To date, Defendant Ace Plating Co. has not incurred any costs at
9 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
10 Plaintiffs at the BKK Class I Facility.

11 75. According to historical BKK Corp. records, Defendant Action
12 Computer Products Inc., and its successors and/or predecessors, contributed
13 manifested waste to the BKK Class I Facility. This manifested waste contained
14 Hazardous Substances that Defendant Action Computer Products Inc. generated
15 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
16 Action Computer Products Inc. has not incurred any costs at the BKK Class I
17 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
18 Class I Facility.

19 76. According to historical BKK Corp. records, Defendant Advance
20 Galvanizing Co., and its successors and/or predecessors, contributed manifested
21 waste to the BKK Class I Facility. This manifested waste contained Hazardous
22 Substances that Defendant Advance Galvanizing Co. generated and/or arranged for
23 its disposal at the BKK Class I Facility. To date, Defendant Advance Galvanizing
24 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
25 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

26 77. According to historical BKK Corp. records, Defendant Advance Gear
27 & Machine Corp., and its successors and/or predecessors, contributed manifested
28 waste to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Defendant Advance Gear & Machine Corp. generated and/or
2 arranged for its disposal at the BKK Class I Facility. To date, Defendant Advance
3 Gear & Machine Corp. has not incurred any costs at the BKK Class I Facility nor
4 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
5 Facility.

6 78. According to historical BKK Corp. records, Defendant Advance Pipe
7 Products, and its successors and/or predecessors, contributed manifested waste to
8 the BKK Class I Facility. This manifested waste contained Hazardous Substances
9 that Defendant Advance Pipe Products generated and/or arranged for its disposal at
10 the BKK Class I Facility. To date, Defendant Advance Pipe Products has not
11 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
12 incurred by the Plaintiffs at the BKK Class I Facility.

13 79. According to historical BKK Corp. records, Defendant Aerodynamic
14 Plating Co., and its successors and/or predecessors, contributed manifested waste to
15 the BKK Class I Facility. This manifested waste contained Hazardous Substances
16 that Defendant Aerodynamic Plating Co. generated and/or arranged for its disposal
17 at the BKK Class I Facility. To date, Defendant Aerodynamic Plating Co. has not
18 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
19 incurred by the Plaintiffs at the BKK Class I Facility.

20 80. According to historical BKK Corp. records, Defendant Aetna Metals
21 Co., and its successors and/or predecessors, contributed manifested waste to the
22 BKK Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant Aetna Metals Co. generated and/or arranged for its disposal at the BKK
24 Class I Facility. To date, Defendant Aetna Metals Co. has not incurred any costs at
25 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
26 Plaintiffs at the BKK Class I Facility.

27 81. According to historical BKK Corp. records, Defendant Airstream of
28 CA, and its successors and/or predecessors, contributed manifested waste to the

1 BKK Class I Facility. This manifested waste contained Hazardous Substances that
2 Defendant Airstream of CA generated and/or arranged for its disposal at the BKK
3 Class I Facility. To date, Defendant Airstream of CA has not incurred any costs at
4 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
5 Plaintiffs at the BKK Class I Facility.

6 82. According to historical BKK Corp. records, Defendant Ajax Hardware
7 Corp., and its successors and/or predecessors, contributed manifested waste to the
8 BKK Class I Facility. This manifested waste contained Hazardous Substances that
9 Defendant Ajax Hardware Corp. generated and/or arranged for its disposal at the
10 BKK Class I Facility. To date, Defendant Ajax Hardware Corp. has not incurred
11 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
12 by the Plaintiffs at the BKK Class I Facility.

13 83. According to historical BKK Corp. records, Defendant Albert Van
14 Luit & Co., and its successors and/or predecessors, contributed manifested waste to
15 the BKK Class I Facility. This manifested waste contained Hazardous Substances
16 that Defendant Albert Van Luit & Co. generated and/or arranged for its disposal at
17 the BKK Class I Facility. To date, Defendant Albert Van Luit & Co. has not
18 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
19 incurred by the Plaintiffs at the BKK Class I Facility.

20 84. According to historical BKK Corp. records, Defendant AlCo-Gravure
21 Inc., and its successors and/or predecessors, contributed manifested waste to the
22 BKK Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant AlCo-Gravure Inc. generated and/or arranged for its disposal at the BKK
24 Class I Facility. To date, Defendant AlCo-Gravure Inc. has not incurred any costs
25 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
26 Plaintiffs at the BKK Class I Facility.

27 85. According to historical BKK Corp. records, Defendant All Valley
28 Plating Co. Inc., and its successors and/or predecessors, contributed manifested

1 waste to the BKK Class I Facility. This manifested waste contained Hazardous
2 Substances that Defendant All Valley Plating Co. Inc. generated and/or arranged for
3 its disposal at the BKK Class I Facility. To date, Defendant All Valley Plating Co.
4 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
5 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

6 86. According to historical BKK Corp. records, Defendant Allesandro
7 Automatic Inc., and its successors and/or predecessors, contributed manifested
8 waste to the BKK Class I Facility. This manifested waste contained Hazardous
9 Substances that Defendant Allesandro Automatic Inc. generated and/or arranged for
10 its disposal at the BKK Class I Facility. To date, Defendant Allesandro Automatic
11 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
12 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

13 87. According to historical BKK Corp. records, Defendant Allied
14 Cleaning Specialists Inc., and its successors and/or predecessors, contributed
15 manifested waste to the BKK Class I Facility. This manifested waste contained
16 Hazardous Substances that Defendant Allied Cleaning Specialists Inc. generated
17 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
18 Allied Cleaning Specialists Inc. has not incurred any costs at the BKK Class I
19 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
20 Class I Facility.

21 88. According to historical BKK Corp. records, Defendant Allyn
22 Transportation Co., and its successors and/or predecessors, contributed manifested
23 waste to the BKK Class I Facility. This manifested waste contained Hazardous
24 Substances that Defendant Allyn Transportation Co. generated and/or arranged for
25 its disposal at the BKK Class I Facility. To date, Defendant Allyn Transportation
26 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
27 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 89. According to historical BKK Corp. records, Defendant Alum-A-Coat
2 Inc., and its successors and/or predecessors, contributed manifested waste to the
3 BKK Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant Alum-A-Coat Inc. generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant Alum-A-Coat Inc. has not incurred any costs at
6 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
7 Plaintiffs at the BKK Class I Facility.

8 90. According to historical BKK Corp. records, Defendant Aluminum
9 Forge Division of APP, and its successors and/or predecessors, contributed
10 manifested waste to the BKK Class I Facility. This manifested waste contained
11 Hazardous Substances that Defendant Aluminum Forge Division of APP generated
12 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
13 Aluminum Forge Division of APP has not incurred any costs at the BKK Class I
14 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
15 Class I Facility.

16 91. According to historical BKK Corp. records, Defendant Alumtreat Inc.,
17 and its successors and/or predecessors, contributed manifested waste to the BKK
18 Class I Facility. This manifested waste contained Hazardous Substances that
19 Defendant Alumtreat Inc. generated and/or arranged for its disposal at the BKK
20 Class I Facility. To date, Defendant Alumtreat Inc. has not incurred any costs at the
21 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
22 at the BKK Class I Facility.

23 92. According to historical BKK Corp. records, Defendant Amco
24 Manufacturing Corp., and its successors and/or predecessors, contributed
25 manifested waste to the BKK Class I Facility. This manifested waste contained
26 Hazardous Substances that Defendant Amco Manufacturing Corp. generated and/or
27 arranged for its disposal at the BKK Class I Facility. To date, Defendant Amco
28

1 Manufacturing Corp. has not incurred any costs at the BKK Class I Facility nor has
2 it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 93. According to historical BKK Corp. records, Defendant American
4 Drawn Steel, and its successors and/or predecessors, contributed manifested waste
5 to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant American Drawn Steel generated and/or arranged for its
7 disposal at the BKK Class I Facility. To date, Defendant American Drawn Steel has
8 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
9 costs incurred by the Plaintiffs at the BKK Class I Facility.

10 94. According to historical BKK Corp. records, Defendant American
11 Environmental LLC, and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant American Environmental LLC generated and/or
14 arranged for its disposal at the BKK Class I Facility. To date, Defendant American
15 Environmental LLC has not incurred any costs at the BKK Class I Facility nor has
16 it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

17 95. According to historical BKK Corp. records, Defendant American
18 Marble & Onyx Inc., and its successors and/or predecessors, contributed manifested
19 waste to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Defendant American Marble & Onyx Inc. generated and/or
21 arranged for its disposal at the BKK Class I Facility. To date, Defendant American
22 Marble & Onyx Inc. has not incurred any costs at the BKK Class I Facility nor has
23 it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 96. According to historical BKK Corp. records, Defendant American
25 Ocean Tile, and its successors and/or predecessors, contributed manifested waste to
26 the BKK Class I Facility. This manifested waste contained Hazardous Substances
27 that Defendant American Ocean Tile generated and/or arranged for its disposal at
28 the BKK Class I Facility. To date, Defendant American Ocean Tile has not incurred

1 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
2 by the Plaintiffs at the BKK Class I Facility.

3 97. According to historical BKK Corp. records, Defendant American
4 Safety Equipment Co., and its successors and/or predecessors, contributed
5 manifested waste to the BKK Class I Facility. This manifested waste contained
6 Hazardous Substances that Defendant American Safety Equipment Co. generated
7 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
8 American Safety Equipment Co. has not incurred any costs at the BKK Class I
9 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
10 Class I Facility.

11 98. According to historical BKK Corp. records, Defendant Ameroil, and
12 its successors and/or predecessors, contributed manifested waste to the BKK Class I
13 Facility. This manifested waste contained Hazardous Substances that Defendant
14 Ameroil generated and/or arranged for its disposal at the BKK Class I Facility. To
15 date, Defendant Ameroil has not incurred any costs at the BKK Class I Facility nor
16 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
17 Facility.

18 99. Upon information and belief, Defendant AmexDrug Corporation is the
19 successor to Defendant Harlyn Products Inc. and/or otherwise liable for manifested
20 waste that was contributed to the BKK Class I Facility by Defendant Harlyn
21 Products Inc. According to historical BKK Corp. records, Defendant Harlyn
22 Products Inc., and its successors and/or predecessors, contributed manifested waste
23 to the BKK Class I Facility. This manifested waste contained Hazardous
24 Substances that Defendant Harlyn Products Inc. generated and/or arranged for its
25 disposal at the BKK Class I Facility. To date, Defendant AmexDrug Corporation
26 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
27 of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 100. According to historical BKK Corp. records, Defendant Anaplex Corp.,
2 and its successors and/or predecessors, contributed manifested waste to the BKK
3 Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant Anaplex Corp. generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant Anaplex Corp. has not incurred any costs at the
6 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
7 at the BKK Class I Facility.

8 101. According to historical BKK Corp. records, Defendant Anchor
9 Hocking Corp., and its successors and/or predecessors, contributed manifested
10 waste to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant Anchor Hocking Corp. generated and/or arranged for its
12 disposal at the BKK Class I Facility. To date, Defendant Anchor Hocking Corp. has
13 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
14 costs incurred by the Plaintiffs at the BKK Class I Facility.

15 102. According to historical BKK Corp. records, Defendant Anderson
16 Lithograph, and its successors and/or predecessors, contributed manifested waste to
17 the BKK Class I Facility. This manifested waste contained Hazardous Substances
18 that Defendant Anderson Lithograph generated and/or arranged for its disposal at
19 the BKK Class I Facility. To date, Defendant Anderson Lithograph has not incurred
20 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
21 by the Plaintiffs at the BKK Class I Facility.

22 103. According to historical BKK Corp. records, Defendant Anodart, and
23 its successors and/or predecessors, contributed manifested waste to the BKK Class I
24 Facility. This manifested waste contained Hazardous Substances that Defendant
25 Anodart generated and/or arranged for its disposal at the BKK Class I Facility. To
26 date, Defendant Anodart has not incurred any costs at the BKK Class I Facility nor
27 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
28 Facility.

1 104. According to historical BKK Corp. records, Defendant Apex Drum
2 Co., and its successors and/or predecessors, contributed manifested waste to the
3 BKK Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant Apex Drum Co. generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant Apex Drum Co. has not incurred any costs at
6 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
7 Plaintiffs at the BKK Class I Facility.

8 105. According to historical BKK Corp. records, Defendant Apodaca &
9 Sons Plating Co., and its successors and/or predecessors, contributed manifested
10 waste to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant Apodaca & Sons Plating Co. generated and/or arranged
12 for its disposal at the BKK Class I Facility. To date, Defendant Apodaca & Sons
13 Plating Co. has not incurred any costs at the BKK Class I Facility nor has it paid its
14 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 106. According to historical BKK Corp. records, Defendant Aquarius
16 Vacuum Truck Service, and its successors and/or predecessors, contributed
17 manifested waste to the BKK Class I Facility. This manifested waste contained
18 Hazardous Substances that Defendant Aquarius Vacuum Truck Service generated
19 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
20 Aquarius Vacuum Truck Service has not incurred any costs at the BKK Class I
21 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
22 Class I Facility.

23 107. According to historical BKK Corp. records, Defendant Arrow Plating
24 Co., and its successors and/or predecessors, contributed manifested waste to the
25 BKK Class I Facility. This manifested waste contained Hazardous Substances that
26 Defendant Arrow Plating Co. generated and/or arranged for its disposal at the BKK
27 Class I Facility. To date, Defendant Arrow Plating Co. has not incurred any costs at
28

1 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
2 Plaintiffs at the BKK Class I Facility.

3 108. According to historical BKK Corp. records, Defendant Artesia Door,
4 and its successors and/or predecessors, contributed manifested waste to the BKK
5 Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Artesia Door generated and/or arranged for its disposal at the BKK Class
7 I Facility. To date, Defendant Artesia Door has not incurred any costs at the BKK
8 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
9 BKK Class I Facility.

10 109. According to historical BKK Corp. records, Defendant Artistic
11 Polishing & Plating Inc., and its successors and/or predecessors, contributed
12 manifested waste to the BKK Class I Facility. This manifested waste contained
13 Hazardous Substances that Defendant Artistic Polishing & Plating Inc. generated
14 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
15 Artistic Polishing & Plating Inc. has not incurred any costs at the BKK Class I
16 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
17 Class I Facility.

18 110. Upon information and belief, Defendant Asbestos Claims Management
19 Corporation is the successor to Defendant Gold Bond Building Products and/or
20 otherwise liable for manifested waste that was contributed to the BKK Class I
21 Facility by Defendant Gold Bond Building Products. According to historical BKK
22 Corp. records, Defendant Gold Bond Building Products contributed manifested
23 waste to the BKK Class I Facility. This manifested waste contained Hazardous
24 Substances that Defendant Gold Bond Building Products generated and/or arranged
25 for its disposal at the BKK Class I Facility. To date, Defendant Asbestos Claims
26 Management Corporation has not incurred any costs at the BKK Class I Facility nor
27 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
28 Facility.

1 111. According to historical BKK Corp. records, Defendant Asbestos
2 Clean-Up & Consultants, and its successors and/or predecessors, contributed
3 manifested waste to the BKK Class I Facility. This manifested waste contained
4 Hazardous Substances that Defendant Asbestos Clean-Up & Consultants generated
5 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
6 Asbestos Clean-Up & Consultants has not incurred any costs at the BKK Class I
7 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
8 Class I Facility.

9 112. According to historical BKK Corp. records, Defendant Asbestos
10 Residential Blanket Number, and its successors and/or predecessors, contributed
11 manifested waste to the BKK Class I Facility. This manifested waste contained
12 Hazardous Substances that Defendant Asbestos Residential Blanket Number
13 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
14 Defendant Asbestos Residential Blanket Number has not incurred any costs at the
15 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
16 at the BKK Class I Facility.

17 113. According to historical BKK Corp. records, Defendant Associated
18 Diesel, and its successors and/or predecessors, contributed manifested waste to the
19 BKK Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Associated Diesel generated and/or arranged for its disposal at the BKK
21 Class I Facility. To date, Defendant Associated Diesel has not incurred any costs at
22 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
23 Plaintiffs at the BKK Class I Facility.

24 114. According to historical BKK Corp. records, Defendant Associated
25 Pacific, and its successors and/or predecessors, contributed manifested waste to the
26 BKK Class I Facility. This manifested waste contained Hazardous Substances that
27 Defendant Associated Pacific generated and/or arranged for its disposal at the BKK
28 Class I Facility. To date, Defendant Associated Pacific has not incurred any costs at

1 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
2 Plaintiffs at the BKK Class I Facility.

3 115. According to historical BKK Corp. records, Defendant Associated
4 Plating Co., and its successors and/or predecessors, contributed manifested waste to
5 the BKK Class I Facility. This manifested waste contained Hazardous Substances
6 that Defendant Associated Plating Co. generated and/or arranged for its disposal at
7 the BKK Class I Facility. To date, Defendant Associated Plating Co. has not
8 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
9 incurred by the Plaintiffs at the BKK Class I Facility.

10 116. Upon information and belief, Defendant Associated Plating Company,
11 Inc. is the successor to Defendant Royal Plating Works and/or otherwise liable for
12 manifested waste that was contributed to the BKK Class I Facility by Defendant
13 Royal Plating Works. According to historical BKK Corp. records, Defendant
14 Royal Plating Works contributed manifested waste to the BKK Class I Facility.
15 This manifested waste contained Hazardous Substances that Defendant Royal
16 Plating Works generated and/or arranged for its disposal at the BKK Class I
17 Facility. To date, Defendant Associated Plating Company, Inc. has not incurred
18 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
19 by the Plaintiffs at the BKK Class I Facility.

20 117. According to historical BKK Corp. records, Defendant Astro Pak
21 Corp., and its successors and/or predecessors, contributed manifested waste to the
22 BKK Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant Astro Pak Corp. generated and/or arranged for its disposal at the BKK
24 Class I Facility. To date, Defendant Astro Pak Corp. has not incurred any costs at
25 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
26 Plaintiffs at the BKK Class I Facility.

27 118. According to historical BKK Corp. records, Defendant Atlas Coverall
28 & Supply, and its successors and/or predecessors, contributed manifested waste to

1 the BKK Class I Facility. This manifested waste contained Hazardous Substances
2 that Defendant Atlas Coverall & Supply generated and/or arranged for its disposal
3 at the BKK Class I Facility. To date, Defendant Atlas Coverall & Supply has not
4 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
5 incurred by the Plaintiffs at the BKK Class I Facility.

6 119. According to historical BKK Corp. records, Defendant Atlas Lighting
7 Co., and its successors and/or predecessors, contributed manifested waste to the
8 BKK Class I Facility. This manifested waste contained Hazardous Substances that
9 Defendant Atlas Lighting Co. generated and/or arranged for its disposal at the
10 BKK Class I Facility. To date, Defendant Atlas Lighting Co. has not incurred any
11 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
12 the Plaintiffs at the BKK Class I Facility.

13 120. According to historical BKK Corp. records, Defendant Automotive
14 Battery Prod Co., and its successors and/or predecessors, contributed manifested
15 waste to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Automotive Battery Prod Co. generated and/or arranged
17 for its disposal at the BKK Class I Facility. To date, Defendant Automotive Battery
18 Prod Co. has not incurred any costs at the BKK Class I Facility nor has it paid its
19 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

20 121. According to historical BKK Corp. records, Defendant Aviation Power
21 Supply, and its successors and/or predecessors, contributed manifested waste to the
22 BKK Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant Aviation Power Supply generated and/or arranged for its disposal at the
24 BKK Class I Facility. To date, Defendant Aviation Power Supply has not incurred
25 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
26 by the Plaintiffs at the BKK Class I Facility.

27 122. According to historical BKK Corp. records, Defendant Azusa Salvage
28 Co., and its successors and/or predecessors, contributed manifested waste to the

1 BKK Class I Facility. This manifested waste contained Hazardous Substances that
2 Defendant Azusa Salvage Co. generated and/or arranged for its disposal at the BKK
3 Class I Facility. To date, Defendant Azusa Salvage Co. has not incurred any costs at
4 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
5 Plaintiffs at the BKK Class I Facility.

6 123. According to historical BKK Corp. records, Defendant B. & B. Pipe &
7 Tool Co., and its successors and/or predecessors, contributed manifested waste to
8 the BKK Class I Facility. This manifested waste contained Hazardous Substances
9 that Defendant B. & B. Pipe & Tool Co. generated and/or arranged for its disposal
10 at the BKK Class I Facility. To date, Defendant B. & B. Pipe & Tool Co. has not
11 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
12 incurred by the Plaintiffs at the BKK Class I Facility.

13 124. According to historical BKK Corp. records, Defendant B. & C. Plating
14 Co., and its successors and/or predecessors, contributed manifested waste to the
15 BKK Class I Facility. This manifested waste contained Hazardous Substances that
16 Defendant B. & C. Plating Co. generated and/or arranged for its disposal at the
17 BKK Class I Facility. To date, Defendant B. & C. Plating Co. has not incurred any
18 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
19 the Plaintiffs at the BKK Class I Facility.

20 125. According to historical BKK Corp. records, Defendant Baker
21 Consultants Inc., and its successors and/or predecessors, contributed manifested
22 waste to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Baker Consultants Inc. generated and/or arranged for its
24 disposal at the BKK Class I Facility. To date, Defendant Baker Consultants Inc. has
25 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
26 costs incurred by the Plaintiffs at the BKK Class I Facility.

27 126. According to historical BKK Corp. records, Defendant Barron Plating
28 Co., and its successors and/or predecessors, contributed manifested waste to the

1 BKK Class I Facility. This manifested waste contained Hazardous Substances that
2 Defendant Barron Plating Co. generated and/or arranged for its disposal at the
3 BKK Class I Facility. To date, Defendant Barron Plating Co. has not incurred any
4 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
5 the Plaintiffs at the BKK Class I Facility.

6 127. According to historical BKK Corp. records, Defendant Barry L. Miller
7 Engineering Co. Inc., and its successors and/or predecessors, contributed
8 manifested waste to the BKK Class I Facility. This manifested waste contained
9 Hazardous Substances that Defendant Barry L. Miller Engineering Co. Inc.
10 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
11 Defendant Barry L. Miller Engineering Co. Inc. has not incurred any costs at the
12 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
13 at the BKK Class I Facility.

14 128. According to historical BKK Corp. records, Defendant Bay Decking
15 Co. Inc., and its successors and/or predecessors, contributed manifested waste to the
16 BKK Class I Facility. This manifested waste contained Hazardous Substances that
17 Defendant Bay Decking Co. Inc. generated and/or arranged for its disposal at the
18 BKK Class I Facility. To date, Defendant Bay Decking Co. Inc. has not incurred
19 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
20 by the Plaintiffs at the BKK Class I Facility.

21 129. According to historical BKK Corp. records, Defendant Bear Paw
22 Mining, and its successors and/or predecessors, contributed manifested waste to the
23 BKK Class I Facility. This manifested waste contained Hazardous Substances that
24 Defendant Bear Paw Mining generated and/or arranged for its disposal at the BKK
25 Class I Facility. To date, Defendant Bear Paw Mining has not incurred any costs at
26 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
27 Plaintiffs at the BKK Class I Facility.

28

1 130. According to historical BKK Corp. records, Defendant Bell Industries,
2 and its successors and/or predecessors, contributed manifested waste to the BKK
3 Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant Bell Industries generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant Bell Industries has not incurred any costs at the
6 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
7 at the BKK Class I Facility.

8 131. According to historical BKK Corp. records, Defendant Bennett
9 Industries, and its successors and/or predecessors, contributed manifested waste to
10 the BKK Class I Facility. This manifested waste contained Hazardous Substances
11 that Defendant Bennett Industries generated and/or arranged for its disposal at the
12 BKK Class I Facility. To date, Defendant Bennett Industries has not incurred any
13 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
14 the Plaintiffs at the BKK Class I Facility.

15 132. According to historical BKK Corp. records, Defendant Beren Corp.,
16 and its successors and/or predecessors, contributed manifested waste to the BKK
17 Class I Facility. This manifested waste contained Hazardous Substances that
18 Defendant Beren Corp. generated and/or arranged for its disposal at the BKK Class
19 I Facility. To date, Defendant Beren Corp. has not incurred any costs at the BKK
20 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
21 BKK Class I Facility.

22 133. According to historical BKK Corp. records, Defendant Bergandi
23 Manufacturing Co. Inc., and its successors and/or predecessors, contributed
24 manifested waste to the BKK Class I Facility. This manifested waste contained
25 Hazardous Substances that Defendant Bergandi Manufacturing Co. Inc. generated
26 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
27 Bergandi Manufacturing Co. Inc. has not incurred any costs at the BKK Class I
28

1 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
2 Class I Facility.

3 134. According to historical BKK Corp. records, Defendant Berk Oil Co.,
4 and its successors and/or predecessors, contributed manifested waste to the BKK
5 Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Berk Oil Co. generated and/or arranged for its disposal at the BKK Class
7 I Facility. To date, Defendant Berk Oil Co. has not incurred any costs at the BKK
8 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
9 BKK Class I Facility.

10 135. According to historical BKK Corp. records, Defendant Berns Co., and
11 its successors and/or predecessors, contributed manifested waste to the BKK Class I
12 Facility. This manifested waste contained Hazardous Substances that Defendant
13 Berns Co. generated and/or arranged for its disposal at the BKK Class I Facility. To
14 date, Defendant Berns Co. has not incurred any costs at the BKK Class I Facility
15 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
16 Facility.

17 136. According to historical BKK Corp. records, Defendant Best
18 Washington Uniform Supply, and its successors and/or predecessors, contributed
19 manifested waste to the BKK Class I Facility. This manifested waste contained
20 Hazardous Substances that Defendant Best Washington Uniform Supply generated
21 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
22 Best Washington Uniform Supply has not incurred any costs at the BKK Class I
23 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
24 Class I Facility.

25 137. According to historical BKK Corp. records, Defendant Betty Glaser
26 Investment Co., and its successors and/or predecessors, contributed manifested
27 waste to the BKK Class I Facility. This manifested waste contained Hazardous
28 Substances that Defendant Betty Glaser Investment Co. generated and/or arranged

1 for its disposal at the BKK Class I Facility. To date, Defendant Betty Glaser
2 Investment Co. has not incurred any costs at the BKK Class I Facility nor has it
3 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

4 138. According to historical BKK Corp. records, Defendant Beylik Drilling,
5 and its successors and/or predecessors, contributed manifested waste to the BKK
6 Class I Facility. This manifested waste contained Hazardous Substances that
7 Defendant Beylik Drilling generated and/or arranged for its disposal at the BKK
8 Class I Facility. To date, Defendant Beylik Drilling has not incurred any costs at the
9 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
10 at the BKK Class I Facility.

11 139. According to historical BKK Corp. records, Defendant Bingo Truck
12 Stop, and its successors and/or predecessors, contributed manifested waste to the
13 BKK Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant Bingo Truck Stop generated and/or arranged for its disposal at the BKK
15 Class I Facility. To date, Defendant Bingo Truck Stop has not incurred any costs at
16 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
17 Plaintiffs at the BKK Class I Facility.

18 140. According to historical BKK Corp. records, Defendant Blackfoot-
19 Cherokee Energy Inc., and its successors and/or predecessors, contributed
20 manifested waste to the BKK Class I Facility. This manifested waste contained
21 Hazardous Substances that Defendant Blackfoot-Cherokee Energy Inc. generated
22 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
23 Blackfoot-Cherokee Energy Inc. has not incurred any costs at the BKK Class I
24 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
25 Class I Facility.

26 141. According to historical BKK Corp. records, Defendant Bliss &
27 Laughlin Steel Co., and its successors and/or predecessors, contributed manifested
28 waste to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Defendant Bliss & Laughlin Steel Co. generated and/or arranged
2 for its disposal at the BKK Class I Facility. To date, Defendant Bliss & Laughlin
3 Steel Co. has not incurred any costs at the BKK Class I Facility nor has it paid its
4 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

5 142. According to historical BKK Corp. records, Defendant Block Oil Co.,
6 and its successors and/or predecessors, contributed manifested waste to the BKK
7 Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Block Oil Co. generated and/or arranged for its disposal at the BKK
9 Class I Facility. To date, Defendant Block Oil Co. has not incurred any costs at the
10 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
11 at the BKK Class I Facility.

12 143. According to historical BKK Corp. records, Defendant Blue Seal
13 Linen Supply, and its successors and/or predecessors, contributed manifested waste
14 to the BKK Class I Facility. This manifested waste contained Hazardous
15 Substances that Defendant Blue Seal Linen Supply generated and/or arranged for its
16 disposal at the BKK Class I Facility. To date, Defendant Blue Seal Linen Supply
17 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
18 of costs incurred by the Plaintiffs at the BKK Class I Facility.

19 144. According to historical BKK Corp. records, Defendant Bob Muller
20 Auto, and its successors and/or predecessors, contributed manifested waste to the
21 BKK Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Bob Muller Auto generated and/or arranged for its disposal at the BKK
23 Class I Facility. To date, Defendant Bob Muller Auto has not incurred any costs at
24 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
25 Plaintiffs at the BKK Class I Facility.

26 145. According to historical BKK Corp. records, Defendant Bob's Plating,
27 and its successors and/or predecessors, contributed manifested waste to the BKK
28 Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant Bob's Plating generated and/or arranged for its disposal at the BKK
2 Class I Facility. To date, Defendant Bob's Plating has not incurred any costs at the
3 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
4 at the BKK Class I Facility.

5 146. According to historical BKK Corp. records, Defendant Bobil Motor
6 Products Inc., and its successors and/or predecessors, contributed manifested waste
7 to the BKK Class I Facility. This manifested waste contained Hazardous
8 Substances that Defendant Bobil Motor Products Inc. generated and/or arranged for
9 its disposal at the BKK Class I Facility. To date, Defendant Bobil Motor Products
10 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
11 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

12 147. According to historical BKK Corp. records, Defendant Bock Co., and
13 its successors and/or predecessors, contributed manifested waste to the BKK Class I
14 Facility. This manifested waste contained Hazardous Substances that Defendant
15 Bock Co. generated and/or arranged for its disposal at the BKK Class I Facility. To
16 date, Defendant Bock Co. has not incurred any costs at the BKK Class I Facility
17 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
18 Facility.

19 148. According to historical BKK Corp. records, Defendant Bonanza
20 Aluminum Inc., and its successors and/or predecessors, contributed manifested
21 waste to the BKK Class I Facility. This manifested waste contained Hazardous
22 Substances that Defendant Bonanza Aluminum Inc. generated and/or arranged for
23 its disposal at the BKK Class I Facility. To date, Defendant Bonanza Aluminum
24 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
25 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

26 149. According to historical BKK Corp. records, Defendant Bortz Oil Co.,
27 and its successors and/or predecessors, contributed manifested waste to the BKK
28 Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant Bortz Oil Co. generated and/or arranged for its disposal at the BKK
2 Class I Facility. To date, Defendant Bortz Oil Co. has not incurred any costs at the
3 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
4 at the BKK Class I Facility.

5 150. According to historical BKK Corp. records, Defendant Boss Uniforms,
6 and its successors and/or predecessors, contributed manifested waste to the BKK
7 Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Boss Uniforms generated and/or arranged for its disposal at the BKK
9 Class I Facility. To date, Defendant Boss Uniforms has not incurred any costs at the
10 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
11 at the BKK Class I Facility.

12 151. According to historical BKK Corp. records, Defendant Brayton Oil,
13 and its successors and/or predecessors, contributed manifested waste to the BKK
14 Class I Facility. This manifested waste contained Hazardous Substances that
15 Defendant Brayton Oil generated and/or arranged for its disposal at the BKK Class
16 I Facility. To date, Defendant Brayton Oil has not incurred any costs at the BKK
17 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
18 BKK Class I Facility.

19 152. According to historical BKK Corp. records, Defendant Brea Canyon
20 Oil Co., and its successors and/or predecessors, contributed manifested waste to the
21 BKK Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Brea Canyon Oil Co. generated and/or arranged for its disposal at the
23 BKK Class I Facility. To date, Defendant Brea Canyon Oil Co. has not incurred
24 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
25 by the Plaintiffs at the BKK Class I Facility.

26 153. According to historical BKK Corp. records, Defendant Brite Sol Inc.,
27 and its successors and/or predecessors, contributed manifested waste to the BKK
28 Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant Brite Sol Inc. generated and/or arranged for its disposal at the BKK
2 Class I Facility. To date, Defendant Brite Sol Inc. has not incurred any costs at the
3 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
4 at the BKK Class I Facility.

5 154. According to historical BKK Corp. records, Defendant Brogdex Corp.,
6 and its successors and/or predecessors, contributed manifested waste to the BKK
7 Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Brogdex Corp. generated and/or arranged for its disposal at the BKK
9 Class I Facility. To date, Defendant Brogdex Corp. has not incurred any costs at the
10 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
11 at the BKK Class I Facility.

12 155. According to historical BKK Corp. records, Defendant BTJ
13 Construction, and its successors and/or predecessors, contributed manifested waste
14 to the BKK Class I Facility. This manifested waste contained Hazardous
15 Substances that Defendant BTJ Construction generated and/or arranged for its
16 disposal at the BKK Class I Facility. To date, Defendant BTJ Construction has not
17 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
18 incurred by the Plaintiffs at the BKK Class I Facility.

19 156. According to historical BKK Corp. records, Defendant Buck Does It
20 Inc., and its successors and/or predecessors, contributed manifested waste to the
21 BKK Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Buck Does It Inc. generated and/or arranged for its disposal at the BKK
23 Class I Facility. To date, Defendant Buck Does It Inc. has not incurred any costs at
24 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
25 Plaintiffs at the BKK Class I Facility.

26 157. According to historical BKK Corp. records, Defendant Buds Oil
27 Service Inc., and its successors and/or predecessors, contributed manifested waste
28 to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Defendant Buds Oil Service Inc. generated and/or arranged for its
2 disposal at the BKK Class I Facility. To date, Defendant Buds Oil Service Inc. has
3 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
4 costs incurred by the Plaintiffs at the BKK Class I Facility.

5 158. According to historical BKK Corp. records, Defendant Bumper Shop,
6 and its successors and/or predecessors, contributed manifested waste to the BKK
7 Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Bumper Shop generated and/or arranged for its disposal at the BKK
9 Class I Facility. To date, Defendant Bumper Shop has not incurred any costs at the
10 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
11 at the BKK Class I Facility.

12 159. According to historical BKK Corp. records, Defendant Bumperline
13 Inc., and its successors and/or predecessors, contributed manifested waste to the
14 BKK Class I Facility. This manifested waste contained Hazardous Substances that
15 Defendant Bumperline Inc. generated and/or arranged for its disposal at the BKK
16 Class I Facility. To date, Defendant Bumperline Inc. has not incurred any costs at
17 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
18 Plaintiffs at the BKK Class I Facility.

19 160. According to historical BKK Corp. records, Defendant Burbank
20 Plating Service Corp., and its successors and/or predecessors, contributed
21 manifested waste to the BKK Class I Facility. This manifested waste contained
22 Hazardous Substances that Defendant Burbank Plating Service Corp. generated
23 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
24 Burbank Plating Service Corp. has not incurred any costs at the BKK Class I
25 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
26 Class I Facility.

27 161. According to historical BKK Corp. records, Defendant Burbank
28 Unified School District, and its successors and/or predecessors, contributed

1 manifested waste to the BKK Class I Facility. This manifested waste contained
2 Hazardous Substances that Defendant Burbank Unified School District generated
3 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
4 Burbank Unified School District has not incurred any costs at the BKK Class I
5 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
6 Class I Facility.

7 162. According to historical BKK Corp. records, Defendant Burke Co., and
8 its successors and/or predecessors, contributed manifested waste to the BKK Class I
9 Facility. This manifested waste contained Hazardous Substances that Defendant
10 Burke Co. generated and/or arranged for its disposal at the BKK Class I Facility. To
11 date, Defendant Burke Co. has not incurred any costs at the BKK Class I Facility
12 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
13 Facility.

14 163. According to historical BKK Corp. records, Defendant Burton Plating
15 Co., and its successors and/or predecessors, contributed manifested waste to the
16 BKK Class I Facility. This manifested waste contained Hazardous Substances that
17 Defendant Burton Plating Co. generated and/or arranged for its disposal at the BKK
18 Class I Facility. To date, Defendant Burton Plating Co. has not incurred any costs at
19 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
20 Plaintiffs at the BKK Class I Facility.

21 164. According to historical BKK Corp. records, Defendant C. & W.
22 Chemicals Co. Inc., and its successors and/or predecessors, contributed manifested
23 waste to the BKK Class I Facility. This manifested waste contained Hazardous
24 Substances that Defendant C. & W. Chemicals Co. Inc. generated and/or arranged
25 for its disposal at the BKK Class I Facility. To date, Defendant C. & W. Chemicals
26 Co. Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its
27 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

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1 165. According to historical BKK Corp. records, Defendant C. M. Dodson
2 Oil, and its successors and/or predecessors, contributed manifested waste to the
3 BKK Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant C. M. Dodson Oil generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant C. M. Dodson Oil has not incurred any costs at
6 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
7 Plaintiffs at the BKK Class I Facility.

8 166. According to historical BKK Corp. records, Defendant Cadet Uniform
9 & Linen Supply Co., and its successors and/or predecessors, contributed manifested
10 waste to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant Cadet Uniform & Linen Supply Co. generated and/or
12 arranged for its disposal at the BKK Class I Facility. To date, Defendant Cadet
13 Uniform & Linen Supply Co. has not incurred any costs at the BKK Class I Facility
14 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
15 Facility.

16 167. According to historical BKK Corp. records, Defendant Cal Bumper
17 Co., and its successors and/or predecessors, contributed manifested waste to the
18 BKK Class I Facility. This manifested waste contained Hazardous Substances that
19 Defendant Cal Bumper Co. generated and/or arranged for its disposal at the BKK
20 Class I Facility. To date, Defendant Cal Bumper Co. has not incurred any costs at
21 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
22 Plaintiffs at the BKK Class I Facility.

23 168. According to historical BKK Corp. records, Defendant Cal Chrome,
24 and its successors and/or predecessors, contributed manifested waste to the BKK
25 Class I Facility. This manifested waste contained Hazardous Substances that
26 Defendant Cal Chrome generated and/or arranged for its disposal at the BKK Class
27 I Facility. To date, Defendant Cal Chrome has not incurred any costs at the BKK
28

1 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
2 BKK Class I Facility.

3 169. According to historical BKK Corp. records, Defendant Cal Metals, and
4 its successors and/or predecessors, contributed manifested waste to the BKK Class I
5 Facility. This manifested waste contained Hazardous Substances that Defendant
6 Cal Metals generated and/or arranged for its disposal at the BKK Class I Facility.
7 To date, Defendant Cal Metals has not incurred any costs at the BKK Class I
8 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
9 Class I Facility.

10 170. According to historical BKK Corp. records, Defendant Califoil Inc.,
11 and its successors and/or predecessors, contributed manifested waste to the BKK
12 Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Califoil Inc. generated and/or arranged for its disposal at the BKK Class
14 I Facility. To date, Defendant Califoil Inc. has not incurred any costs at the BKK
15 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
16 BKK Class I Facility.

17 171. According to historical BKK Corp. records, Defendant California
18 Corrugated Ind., and its successors and/or predecessors, contributed manifested
19 waste to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Defendant California Corrugated Ind. generated and/or arranged for
21 its disposal at the BKK Class I Facility. To date, Defendant California Corrugated
22 Ind. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
23 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 172. According to historical BKK Corp. records, Defendant California
25 Finished Metals Inc., and its successors and/or predecessors, contributed manifested
26 waste to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant California Finished Metals Inc. generated and/or
28 arranged for its disposal at the BKK Class I Facility. To date, Defendant California

1 Finished Metals Inc. has not incurred any costs at the BKK Class I Facility nor has
2 it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 173. According to historical BKK Corp. records, Defendant California
4 Metal Enameling Co., and its successors and/or predecessors, contributed
5 manifested waste to the BKK Class I Facility. This manifested waste contained
6 Hazardous Substances that Defendant California Metal Enameling Co. generated
7 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
8 California Metal Enameling Co. has not incurred any costs at the BKK Class I
9 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
10 Class I Facility.

11 174. According to historical BKK Corp. records, Defendant California
12 Motor Express, and its successors and/or predecessors, contributed manifested
13 waste to the BKK Class I Facility. This manifested waste contained Hazardous
14 Substances that Defendant California Motor Express generated and/or arranged for
15 its disposal at the BKK Class I Facility. To date, Defendant California Motor
16 Express has not incurred any costs at the BKK Class I Facility nor has it paid its
17 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

18 175. According to historical BKK Corp. records, Defendant California Ship
19 Building, and its successors and/or predecessors, contributed manifested waste to
20 the BKK Class I Facility. This manifested waste contained Hazardous Substances
21 that Defendant California Ship Building generated and/or arranged for its disposal
22 at the BKK Class I Facility. To date, Defendant California Ship Building has not
23 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
24 incurred by the Plaintiffs at the BKK Class I Facility.

25 176. According to historical BKK Corp. records, Defendant California
26 Target Enterprises, and its successors and/or predecessors, contributed manifested
27 waste to the BKK Class I Facility. This manifested waste contained Hazardous
28 Substances that Defendant California Target Enterprises generated and/or arranged

1 for its disposal at the BKK Class I Facility. To date, Defendant California Target
2 Enterprises has not incurred any costs at the BKK Class I Facility nor has it paid its
3 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

4 177. According to historical BKK Corp. records, Defendant Cal-Mold Inc.,
5 and its successors and/or predecessors, contributed manifested waste to the BKK
6 Class I Facility. This manifested waste contained Hazardous Substances that
7 Defendant Cal-Mold Inc. generated and/or arranged for its disposal at the BKK
8 Class I Facility. To date, Defendant Cal-Mold Inc. has not incurred any costs at the
9 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
10 at the BKK Class I Facility.

11 178. According to historical BKK Corp. records, Defendant California
12 Technical Plating Corp., and its successors and/or predecessors, contributed
13 manifested waste to the BKK Class I Facility. This manifested waste contained
14 Hazardous Substances that Defendant California Technical Plating Corp. generated
15 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
16 California Technical Plating Corp. has not incurred any costs at the BKK Class I
17 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
18 Class I Facility.

19 179. According to historical BKK Corp. records, Defendant Calpro Co., and
20 its successors and/or predecessors, contributed manifested waste to the BKK Class I
21 Facility. This manifested waste contained Hazardous Substances that Defendant
22 Calpro Co. generated and/or arranged for its disposal at the BKK Class I Facility.
23 To date, Defendant Calpro Co. has not incurred any costs at the BKK Class I
24 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
25 Class I Facility.

26 180. According to historical BKK Corp. records, Defendant Cal-West
27 Circuits Inc., and its successors and/or predecessors, contributed manifested waste
28 to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Defendant Cal-West Circuits Inc. generated and/or arranged for its
2 disposal at the BKK Class I Facility. To date, Defendant Cal-West Circuits Inc. has
3 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
4 costs incurred by the Plaintiffs at the BKK Class I Facility.

5 181. According to historical BKK Corp. records, Defendant Calzona
6 Transportation, and its successors and/or predecessors, contributed manifested
7 waste to the BKK Class I Facility. This manifested waste contained Hazardous
8 Substances that Defendant Calzona Transportation generated and/or arranged for its
9 disposal at the BKK Class I Facility. To date, Defendant Calzona Transportation
10 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
11 of costs incurred by the Plaintiffs at the BKK Class I Facility.

12 182. According to historical BKK Corp. records, Defendant Cannel &
13 Chaffin Co., and its successors and/or predecessors, contributed manifested waste
14 to the BKK Class I Facility. This manifested waste contained Hazardous
15 Substances that Defendant Cannel & Chaffin Co. generated and/or arranged for its
16 disposal at the BKK Class I Facility. To date, Defendant Cannel & Chaffin Co. has
17 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
18 costs incurred by the Plaintiffs at the BKK Class I Facility.

19 183. According to historical BKK Corp. records, Defendant Capri Pumping
20 Service, and its successors and/or predecessors, contributed manifested waste to the
21 BKK Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Capri Pumping Service generated and/or arranged for its disposal at the
23 BKK Class I Facility. To date, Defendant Capri Pumping Service has not incurred
24 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
25 by the Plaintiffs at the BKK Class I Facility.

26 184. According to historical BKK Corp. records, Defendant Capro Oil Co.,
27 and its successors and/or predecessors, contributed manifested waste to the BKK
28 Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant Capro Oil Co. generated and/or arranged for its disposal at the BKK
2 Class I Facility. To date, Defendant Capro Oil Co. has not incurred any costs at the
3 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
4 at the BKK Class I Facility.

5 185. According to historical BKK Corp. records, Defendant Carlsberg
6 Management, and its successors and/or predecessors, contributed manifested waste
7 to the BKK Class I Facility. This manifested waste contained Hazardous
8 Substances that Defendant Carlsberg Management generated and/or arranged for its
9 disposal at the BKK Class I Facility. To date, Defendant Carlsberg Management
10 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
11 of costs incurred by the Plaintiffs at the BKK Class I Facility.

12 186. According to historical BKK Corp. records, Defendant Carter
13 Precision Parts Inc., and its successors and/or predecessors, contributed manifested
14 waste to the BKK Class I Facility. This manifested waste contained Hazardous
15 Substances that Defendant Carter Precision Parts Inc. generated and/or arranged
16 for its disposal at the BKK Class I Facility. To date, Defendant Carter Precision
17 Parts Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its
18 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

19 187. Upon information and belief, Defendant Cascade Die Casting Group
20 Inc. is the successor to Defendant W. L. Chapman Co. and/or otherwise liable for
21 manifested waste that was contributed to the BKK Class I Facility by W. L.
22 Chapman Co. According to historical BKK Corp. records, Defendant W. L.
23 Chapman Co., and its successors and/or predecessors, contributed manifested waste
24 to the BKK Class I Facility. This manifested waste contained Hazardous
25 Substances that Defendant W. L. Chapman Co. generated and/or arranged for its
26 disposal at the BKK Class I Facility. To date, Defendant Cascade Die Casting
27 Group Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its
28 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 188. According to historical BKK Corp. records, Defendant Casden Co.,
2 and its successors and/or predecessors, contributed manifested waste to the BKK
3 Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant Casden Co. generated and/or arranged for its disposal at the BKK Class I
5 Facility. To date, Defendant Casden Co. has not incurred any costs at the BKK
6 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
7 BKK Class I Facility.

8 189. According to historical BKK Corp. records, Defendant Caspian Inc.,
9 and its successors and/or predecessors, contributed manifested waste to the BKK
10 Class I Facility. This manifested waste contained Hazardous Substances that
11 Defendant Caspian Inc. generated and/or arranged for its disposal at the BKK Class
12 I Facility. To date, Defendant Caspian Inc. has not incurred any costs at the BKK
13 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
14 BKK Class I Facility.

15 190. According to historical BKK Corp. records, Defendant Cast Metal
16 Finishing, and its successors and/or predecessors, contributed manifested waste to
17 the BKK Class I Facility. This manifested waste contained Hazardous Substances
18 that Defendant Cast Metal Finishing generated and/or arranged for its disposal at
19 the BKK Class I Facility. To date, Defendant Cast Metal Finishing has not incurred
20 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
21 by the Plaintiffs at the BKK Class I Facility.

22 191. According to historical BKK Corp. records, Defendant CBC
23 Industries, and its successors and/or predecessors, contributed manifested waste to
24 the BKK Class I Facility. This manifested waste contained Hazardous Substances
25 that Defendant CBC Industries generated and/or arranged for its disposal at the
26 BKK Class I Facility. To date, Defendant CBC Industries has not incurred any
27 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
28 the Plaintiffs at the BKK Class I Facility.

1 192. According to historical BKK Corp. records, Defendant Cedargreen
2 Refining Co., and its successors and/or predecessors, contributed manifested waste
3 to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant Cedargreen Refining Co. generated and/or arranged for
5 its disposal at the BKK Class I Facility. To date, Defendant Cedargreen Refining
6 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
7 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

8 193. According to historical BKK Corp. records, Defendant Cedko
9 Electronics, and its successors and/or predecessors, contributed manifested waste to
10 the BKK Class I Facility. This manifested waste contained Hazardous Substances
11 that Defendant Cedko Electronics generated and/or arranged for its disposal at the
12 BKK Class I Facility. To date, Defendant Cedko Electronics has not incurred any
13 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
14 the Plaintiffs at the BKK Class I Facility.

15 194. According to historical BKK Corp. records, Defendant Celotex Corp.,
16 and its successors and/or predecessors, contributed manifested waste to the BKK
17 Class I Facility. This manifested waste contained Hazardous Substances that
18 Defendant Celotex Corp. generated and/or arranged for its disposal at the BKK
19 Class I Facility. To date, Defendant Celotex Corp. has not incurred any costs at the
20 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
21 at the BKK Class I Facility.

22 195. According to historical BKK Corp. records, Defendant Central
23 Industrial Engineering, and its successors and/or predecessors, contributed
24 manifested waste to the BKK Class I Facility. This manifested waste contained
25 Hazardous Substances that Defendant Central Industrial Engineering generated
26 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
27 Central Industrial Engineering has not incurred any costs at the BKK Class I
28

1 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
2 Class I Facility.

3 196. According to historical BKK Corp. records, Defendant Central
4 Insulation Corp., and its successors and/or predecessors, contributed manifested
5 waste to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant Central Insulation Corp. generated and/or arranged for
7 its disposal at the BKK Class I Facility. To date, Defendant Central Insulation
8 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
9 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 197. According to historical BKK Corp. records, Defendant Central Plants
11 Inc., and its successors and/or predecessors, contributed manifested waste to the
12 BKK Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Central Plants Inc. generated and/or arranged for its disposal at the BKK
14 Class I Facility. To date, Defendant Central Plants Inc. has not incurred any costs at
15 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
16 Plaintiffs at the BKK Class I Facility.

17 198. According to historical BKK Corp. records, Defendant Century
18 Phoenix Laminators Inc., and its successors and/or predecessors, contributed
19 manifested waste to the BKK Class I Facility. This manifested waste contained
20 Hazardous Substances that Defendant Century Phoenix Laminators Inc. generated
21 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
22 Century Phoenix Laminators Inc. has not incurred any costs at the BKK Class I
23 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
24 Class I Facility.

25 199. According to historical BKK Corp. records, Defendant Certified
26 Grocers of Cal., and its successors and/or predecessors, contributed manifested
27 waste to the BKK Class I Facility. This manifested waste contained Hazardous
28 Substances that Defendant Certified Grocers of Cal. generated and/or arranged for

1 its disposal at the BKK Class I Facility. To date, Defendant Certified Grocers of
2 Cal. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
3 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

4 200. According to historical BKK Corp. records, Defendant Chacon
5 Chemical Corp., and its successors and/or predecessors, contributed manifested
6 waste to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Chacon Chemical Corp. generated and/or arranged for
8 its disposal at the BKK Class I Facility. To date, Defendant Chacon Chemical Corp.
9 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
10 of costs incurred by the Plaintiffs at the BKK Class I Facility.

11 201. According to historical BKK Corp. records, Defendant Challenge
12 Cook Bros, and its successors and/or predecessors, contributed manifested waste to
13 the BKK Class I Facility. This manifested waste contained Hazardous Substances
14 that Defendant Challenge Cook Bros generated and/or arranged for its disposal at
15 the BKK Class I Facility. To date, Defendant Challenge Cook Bros has not incurred
16 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
17 by the Plaintiffs at the BKK Class I Facility.

18 202. According to historical BKK Corp. records, Defendant Champion
19 Power Wash, and its successors and/or predecessors, contributed manifested waste
20 to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Defendant Champion Power Wash generated and/or arranged for its
22 disposal at the BKK Class I Facility. To date, Defendant Champion Power Wash
23 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
24 of costs incurred by the Plaintiffs at the BKK Class I Facility.

25 203. According to historical BKK Corp. records, Defendant Charles
26 Bruning Co., and its successors and/or predecessors, contributed manifested waste
27 to the BKK Class I Facility. This manifested waste contained Hazardous
28 Substances that Defendant Charles Bruning Co. generated and/or arranged for its

1 disposal at the BKK Class I Facility. To date, Defendant Charles Bruning Co. has
2 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
3 costs incurred by the Plaintiffs at the BKK Class I Facility.

4 204. According to historical BKK Corp. records, Defendant Chem Arrow
5 Corp., and its successors and/or predecessors, contributed manifested waste to the
6 BKK Class I Facility. This manifested waste contained Hazardous Substances that
7 Defendant Chem Arrow Corp. generated and/or arranged for its disposal at the
8 BKK Class I Facility. To date, Defendant Chem Arrow Corp. has not incurred any
9 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
10 the Plaintiffs at the BKK Class I Facility.

11 205. According to historical BKK Corp. records, Defendant Chem Etch
12 Corp., and its successors and/or predecessors, contributed manifested waste to the
13 BKK Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant Chem Etch Corp. generated and/or arranged for its disposal at the BKK
15 Class I Facility. To date, Defendant Chem Etch Corp. has not incurred any costs at
16 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
17 Plaintiffs at the BKK Class I Facility.

18 206. According to historical BKK Corp. records, Defendant Chem West
19 Industries Inc., and its successors and/or predecessors, contributed manifested
20 waste to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Defendant Chem West Industries Inc. generated and/or arranged for
22 its disposal at the BKK Class I Facility. To date, Defendant Chem West Industries
23 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
24 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

25 207. According to historical BKK Corp. records, Defendant Chemical Co.,
26 and its successors and/or predecessors, contributed manifested waste to the BKK
27 Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Chemical Co. generated and/or arranged for its disposal at the BKK

1 Class I Facility. To date, Defendant Chemical Co. has not incurred any costs at the
2 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
3 at the BKK Class I Facility.

4 208. According to historical BKK Corp. records, Defendant Chemical
5 Energy, and its successors and/or predecessors, contributed manifested waste to the
6 BKK Class I Facility. This manifested waste contained Hazardous Substances that
7 Defendant Chemical Energy generated and/or arranged for its disposal at the BKK
8 Class I Facility. To date, Defendant Chemical Energy has not incurred any costs at
9 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
10 Plaintiffs at the BKK Class I Facility.

11 209. According to historical BKK Corp. records, Defendant Chemical
12 Machining Corp., and its successors and/or predecessors, contributed manifested
13 waste to the BKK Class I Facility. This manifested waste contained Hazardous
14 Substances that Defendant Chemical Machining Corp. generated and/or arranged
15 for its disposal at the BKK Class I Facility. To date, Defendant Chemical
16 Machining Corp. has not incurred any costs at the BKK Class I Facility nor has it
17 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

18 210. According to historical BKK Corp. records, Defendant Chemical
19 Milling International, and its successors and/or predecessors, contributed
20 manifested waste to the BKK Class I Facility. This manifested waste contained
21 Hazardous Substances that Defendant Chemical Milling International generated
22 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
23 Chemical Milling International has not incurred any costs at the BKK Class I
24 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
25 Class I Facility.

26 211. Upon information and belief, Defendant Chemoil Corp. is the
27 successor to Defendant Chemoil Refining Corp. and/or otherwise liable for
28 manifested waste that was contributed to the BKK Class I Facility by Defendant

1 Chemoil Refining Corp. According to historical BKK Corp. records, Defendant
2 Chemoil Refining Corp., and its successors and/or predecessors, contributed
3 manifested waste to the BKK Class I Facility. This manifested waste contained
4 Hazardous Substances that Defendant Chemoil Refining Corp. generated and/or
5 arranged for its disposal at the BKK Class I Facility. To date, Defendant Chemoil
6 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
7 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

8 212. According to historical BKK Corp. records, Defendant Chemoil
9 Refining Corp., and its successors and/or predecessors, contributed manifested
10 waste to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant Chemoil Refining Corp. generated and/or arranged for
12 its disposal at the BKK Class I Facility. To date, Defendant Chemoil Refining
13 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
14 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 213. According to historical BKK Corp. records, Defendant Chemplate
16 Corp., and its successors and/or predecessors, contributed manifested waste to the
17 BKK Class I Facility. This manifested waste contained Hazardous Substances that
18 Defendant Chemplate Corp. generated and/or arranged for its disposal at the BKK
19 Class I Facility. To date, Defendant Chemplate Corp. has not incurred any costs at
20 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
21 Plaintiffs at the BKK Class I Facility.

22 214. According to historical BKK Corp. records, Defendant Chemron
23 Corp., and its successors and/or predecessors, contributed manifested waste to the
24 BKK Class I Facility. This manifested waste contained Hazardous Substances that
25 Defendant Chemron Corp. generated and/or arranged for its disposal at the BKK
26 Class I Facility. To date, Defendant Chemron Corp. has not incurred any costs at
27 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
28 Plaintiffs at the BKK Class I Facility.

1 215. According to historical BKK Corp. records, Defendant Chemware, and
2 its successors and/or predecessors, contributed manifested waste to the BKK Class I
3 Facility. This manifested waste contained Hazardous Substances that Defendant
4 Chemware generated and/or arranged for its disposal at the BKK Class I Facility.
5 To date, Defendant Chemware has not incurred any costs at the BKK Class I
6 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
7 Class I Facility.

8 216. According to historical BKK Corp. records, Defendant Chick Sales
9 Plating Corp., and its successors and/or predecessors, contributed manifested waste
10 to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant Chick Sales Plating Corp. generated and/or arranged for
12 its disposal at the BKK Class I Facility. To date, Defendant Chick Sales Plating
13 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
14 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 217. According to historical BKK Corp. records, Defendant Chino Valley
16 Galvanizing Co., and its successors and/or predecessors, contributed manifested
17 waste to the BKK Class I Facility. This manifested waste contained Hazardous
18 Substances that Defendant Chino Valley Galvanizing Co. generated and/or
19 arranged for its disposal at the BKK Class I Facility. To date, Defendant Chino
20 Valley Galvanizing Co. has not incurred any costs at the BKK Class I Facility nor
21 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
22 Facility.

23 218. According to historical BKK Corp. records, Defendant CHB Foods,
24 and its successors and/or predecessors, contributed manifested waste to the BKK
25 Class I Facility. This manifested waste contained Hazardous Substances that
26 Defendant CHB Foods generated and/or arranged for its disposal at the BKK Class
27 I Facility. To date, Defendant CHB Foods has not incurred any costs at the BKK
28

1 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
2 BKK Class I Facility.

3 219. Upon information and belief, Defendant Chromalloy Corporation is
4 the successor to Defendant Chromizing Co. and/or otherwise liable for manifested
5 waste that was contributed to the BKK Class I Facility by Defendant Chromizing
6 Co. According to historical BKK Corp. records, Defendant Chromizing Co.
7 contributed manifested waste to the BKK Class I Facility. This manifested waste
8 contained Hazardous Substances that Defendant Chromizing Co. generated and/or
9 arranged for its disposal at the BKK Class I Facility. To date, Defendant
10 Chromalloy Corporation has not incurred any costs at the BKK Class I Facility nor
11 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
12 Facility.

13 220. According to historical BKK Corp. records, Defendant Chrome
14 Crankshaft Co., and its successors and/or predecessors, contributed manifested
15 waste to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Chrome Crankshaft Co. generated and/or arranged for its
17 disposal at the BKK Class I Facility. To date, Defendant Chrome Crankshaft Co.
18 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
19 of costs incurred by the Plaintiffs at the BKK Class I Facility.

20 221. According to historical BKK Corp. records, Defendant Chromizing
21 Co., and its successors and/or predecessors, contributed manifested waste to the
22 BKK Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant Chromizing Co. generated and/or arranged for its disposal at the BKK
24 Class I Facility. To date, Defendant Chromizing Co. has not incurred any costs at
25 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
26 Plaintiffs at the BKK Class I Facility.

27 222. According to historical BKK Corp. records, Defendant Circuit
28 Industries, and its successors and/or predecessors, contributed manifested waste to

1 the BKK Class I Facility. This manifested waste contained Hazardous Substances
2 that Defendant Circuit Industries generated and/or arranged for its disposal at the
3 BKK Class I Facility. To date, Defendant Circuit Industries has not incurred any
4 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
5 the Plaintiffs at the BKK Class I Facility.

6 223. According to historical BKK Corp. records, Defendant City of Carson
7 contributed both municipal waste and manifested waste to the BKK Class I Facility.
8 This manifested waste contained Hazardous Substances that Defendant City of
9 Carson generated and/or arranged for its disposal at the BKK Class I Facility. To
10 date, Defendant City of Carson has not incurred any costs at the BKK Class I
11 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
12 Class I Facility.

13 224. According to historical BKK Corp. records, Defendant City of
14 Riverside contributed both municipal waste and manifested waste to the BKK Class
15 I Facility. This manifested waste contained Hazardous Substances that Defendant
16 City of Riverside generated and/or arranged for its disposal at the BKK Class I
17 Facility. To date, Defendant City of Riverside has not incurred any costs at the
18 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
19 at the BKK Class I Facility.

20 225. According to historical BKK Corp. records, Defendant City of San
21 Diego contributed both municipal waste and manifested waste to the BKK Class I
22 Facility. This manifested waste contained Hazardous Substances that Defendant
23 City of San Diego generated and/or arranged for its disposal at the BKK Class I
24 Facility. To date, Defendant City of San Diego has not incurred any costs at the
25 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
26 at the BKK Class I Facility.

27 226. According to historical BKK Corp. records, Defendant Clayton
28 Manufacturing Co., and its successors and/or predecessors, contributed manifested

1 waste to the BKK Class I Facility. This manifested waste contained Hazardous
2 Substances that Defendant Clayton Manufacturing Co. generated and/or arranged
3 for its disposal at the BKK Class I Facility. To date, Defendant Clayton
4 Manufacturing Co. has not incurred any costs at the BKK Class I Facility nor has it
5 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

6 227. According to historical BKK Corp. records, Defendant Clean Steel
7 Inc., and its successors and/or predecessors, contributed manifested waste to the
8 BKK Class I Facility. This manifested waste contained Hazardous Substances that
9 Defendant Clean Steel Inc. generated and/or arranged for its disposal at the BKK
10 Class I Facility. To date, Defendant Clean Steel Inc. has not incurred any costs at
11 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
12 Plaintiffs at the BKK Class I Facility.

13 228. According to historical BKK Corp. records, Defendant Cleaning
14 Dynamics Corp., and its successors and/or predecessors, contributed manifested
15 waste to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Cleaning Dynamics Corp. generated and/or arranged for
17 its disposal at the BKK Class I Facility. To date, Defendant Cleaning Dynamics
18 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
19 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

20 229. According to historical BKK Corp. records, Defendant Climax Tube
21 Corp., and its successors and/or predecessors, contributed manifested waste to the
22 BKK Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant Climax Tube Corp. generated and/or arranged for its disposal at the
24 BKK Class I Facility. To date, Defendant Climax Tube Corp. has not incurred any
25 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
26 the Plaintiffs at the BKK Class I Facility.

27 230. According to historical BKK Corp. records, Defendant Coast
28 Contractors, and its successors and/or predecessors, contributed manifested waste to

1 the BKK Class I Facility. This manifested waste contained Hazardous Substances
2 that Defendant Coast Contractors generated and/or arranged for its disposal at the
3 BKK Class I Facility. To date, Defendant Coast Contractors has not incurred any
4 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
5 the Plaintiffs at the BKK Class I Facility.

6 231. According to historical BKK Corp. records, Defendant Collins General
7 Contractors, and its successors and/or predecessors, contributed manifested waste to
8 the BKK Class I Facility. This manifested waste contained Hazardous Substances
9 that Defendant Collins General Contractors generated and/or arranged for its
10 disposal at the BKK Class I Facility. To date, Defendant Collins General
11 Contractors has not incurred any costs at the BKK Class I Facility nor has it paid its
12 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

13 232. According to historical BKK Corp. records, Defendant Columbia
14 Metal Finishing Inc., and its successors and/or predecessors, contributed manifested
15 waste to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Columbia Metal Finishing Inc. generated and/or
17 arranged for its disposal at the BKK Class I Facility. To date, Defendant Columbia
18 Metal Finishing Inc. has not incurred any costs at the BKK Class I Facility nor has
19 it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

20 233. According to historical BKK Corp. records, Defendant Columbine &
21 Associates, and its successors and/or predecessors, contributed manifested waste to
22 the BKK Class I Facility. This manifested waste contained Hazardous Substances
23 that Defendant Columbine & Associates generated and/or arranged for its disposal
24 at the BKK Class I Facility. To date, Defendant Columbine & Associates has not
25 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
26 incurred by the Plaintiffs at the BKK Class I Facility.

27 234. According to historical BKK Corp. records, Defendant Commercial
28 Chemical Co. Inc., and its successors and/or predecessors, contributed manifested

1 waste to the BKK Class I Facility. This manifested waste contained Hazardous
2 Substances that Defendant Commercial Chemical Co. Inc. generated and/or
3 arranged for its disposal at the BKK Class I Facility. To date, Defendant
4 Commercial Chemical Co. Inc. has not incurred any costs at the BKK Class I
5 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
6 Class I Facility.

7 235. According to historical BKK Corp. records, Defendant Commercial
8 Cleaning Corp., and its successors and/or predecessors, contributed manifested
9 waste to the BKK Class I Facility. This manifested waste contained Hazardous
10 Substances that Defendant Commercial Cleaning Corp. generated and/or arranged
11 for its disposal at the BKK Class I Facility. To date, Defendant Commercial
12 Cleaning Corp. has not incurred any costs at the BKK Class I Facility nor has it
13 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

14 236. According to historical BKK Corp. records, Defendant Commercial
15 Truck Bodies, and its successors and/or predecessors, contributed manifested waste
16 to the BKK Class I Facility. This manifested waste contained Hazardous
17 Substances that Defendant Commercial Truck Bodies generated and/or arranged for
18 its disposal at the BKK Class I Facility. To date, Defendant Commercial Truck
19 Bodies has not incurred any costs at the BKK Class I Facility nor has it paid its fair
20 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

21 237. According to historical BKK Corp. records, Defendant Computer
22 Automation, and its successors and/or predecessors, contributed manifested waste
23 to the BKK Class I Facility. This manifested waste contained Hazardous
24 Substances that Defendant Computer Automation generated and/or arranged for its
25 disposal at the BKK Class I Facility. To date, Defendant Computer Automation has
26 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
27 costs incurred by the Plaintiffs at the BKK Class I Facility.

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1 238. According to historical BKK Corp. records, Defendant Conejo Valley
2 Unified School District, and its successors and/or predecessors, contributed
3 manifested waste to the BKK Class I Facility. This manifested waste contained
4 Hazardous Substances that Defendant Conejo Valley Unified School District
5 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
6 Defendant Conejo Valley Unified School District has not incurred any costs at the
7 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
8 at the BKK Class I Facility.

9 239. According to historical BKK Corp. records, Defendant Conexx Oil,
10 and its successors and/or predecessors, contributed manifested waste to the BKK
11 Class I Facility. This manifested waste contained Hazardous Substances that
12 Defendant Conexx Oil generated and/or arranged for its disposal at the BKK Class I
13 Facility. To date, Defendant Conexx Oil has not incurred any costs at the BKK
14 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
15 BKK Class I Facility.

16 240. According to historical BKK Corp. records, Defendant Connector
17 Service Corp., and its successors and/or predecessors, contributed manifested waste
18 to the BKK Class I Facility. This manifested waste contained Hazardous
19 Substances that Defendant Connector Service Corp. generated and/or arranged for
20 its disposal at the BKK Class I Facility. To date, Defendant Connector Service
21 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
22 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 241. According to historical BKK Corp. records, Defendant Conrac Corp.,
24 and its successors and/or predecessors, contributed manifested waste to the BKK
25 Class I Facility. This manifested waste contained Hazardous Substances that
26 Defendant Conrac Corp. generated and/or arranged for its disposal at the BKK
27 Class I Facility. To date, Defendant Conrac Corp. has not incurred any costs at the
28

1 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
2 at the BKK Class I Facility.

3 242. According to historical BKK Corp. records, Defendant Conrock Co.,
4 and its successors and/or predecessors, contributed manifested waste to the BKK
5 Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Conrock Co. generated and/or arranged for its disposal at the BKK Class
7 I Facility. To date, Defendant Conrock Co. has not incurred any costs at the BKK
8 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
9 BKK Class I Facility.

10 243. According to historical BKK Corp. records, Defendant Consolidated
11 Auto, and its successors and/or predecessors, contributed manifested waste to the
12 BKK Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Consolidated Auto generated and/or arranged for its disposal at the BKK
14 Class I Facility. To date, Defendant Consolidated Auto has not incurred any costs at
15 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
16 Plaintiffs at the BKK Class I Facility.

17 244. According to historical BKK Corp. records, Defendant Container
18 Supply Co., and its successors and/or predecessors, contributed manifested waste to
19 the BKK Class I Facility. This manifested waste contained Hazardous Substances
20 that Defendant Container Supply Co. generated and/or arranged for its disposal at
21 the BKK Class I Facility. To date, Defendant Container Supply Co. has not
22 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
23 incurred by the Plaintiffs at the BKK Class I Facility.

24 245. According to historical BKK Corp. records, Defendant Contempo
25 Furniture, and its successors and/or predecessors, contributed manifested waste to
26 the BKK Class I Facility. This manifested waste contained Hazardous Substances
27 that Defendant Contempo Furniture generated and/or arranged for its disposal at the
28 BKK Class I Facility. To date, Defendant Contempo Furniture has not incurred any

1 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
2 the Plaintiffs at the BKK Class I Facility.

3 246. According to historical BKK Corp. records, Defendant Continental
4 Chemical Corp., and its successors and/or predecessors, contributed manifested
5 waste to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant Continental Chemical Corp. generated and/or arranged
7 for its disposal at the BKK Class I Facility. To date, Defendant Continental
8 Chemical Corp. has not incurred any costs at the BKK Class I Facility nor has it
9 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 247. According to historical BKK Corp. records, Defendant Continental
11 Forest Industries, and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant Continental Forest Industries generated and/or arranged
14 for its disposal at the BKK Class I Facility. To date, Defendant Continental Forest
15 Industries has not incurred any costs at the BKK Class I Facility nor has it paid its
16 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

17 248. Upon information and belief, Defendant Continental Forest Industries,
18 Inc. is the successor to Defendant Continental Forest Industries and/or otherwise
19 liable for manifested waste that was contributed to the BKK Class I Facility by
20 Defendant Continental Forest Industries. According to historical BKK Corp.
21 records, Defendant Continental Forest Industries contributed manifested waste to
22 the BKK Class I Facility. This manifested waste contained Hazardous Substances
23 that Defendant Continental Forest Industries generated and/or arranged for its
24 disposal at the BKK Class I Facility. To date, Defendant Continental Forest
25 Industries, Inc. has not incurred any costs at the BKK Class I Facility nor has it paid
26 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 249. According to historical BKK Corp. records, Defendant Continental
28 Polymers Inc., and its successors and/or predecessors, contributed manifested waste

1 to the BKK Class I Facility. This manifested waste contained Hazardous
2 Substances that Defendant Continental Polymers Inc. generated and/or arranged for
3 its disposal at the BKK Class I Facility. To date, Defendant Continental Polymers
4 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
5 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

6 250. According to historical BKK Corp. records, Defendant Control
7 Circuits, and its successors and/or predecessors, contributed manifested waste to the
8 BKK Class I Facility. This manifested waste contained Hazardous Substances that
9 Defendant Control Circuits generated and/or arranged for its disposal at the BKK
10 Class I Facility. To date, Defendant Control Circuits has not incurred any costs at
11 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
12 Plaintiffs at the BKK Class I Facility.

13 251. According to historical BKK Corp. records, Defendant Control Plating
14 Co. Inc., and its successors and/or predecessors, contributed manifested waste to the
15 BKK Class I Facility. This manifested waste contained Hazardous Substances that
16 Defendant Control Plating Co. Inc. generated and/or arranged for its disposal at the
17 BKK Class I Facility. To date, Defendant Control Plating Co. Inc. has not incurred
18 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
19 by the Plaintiffs at the BKK Class I Facility.

20 252. According to historical BKK Corp. records, Defendant Cooper LA
21 Clear Drum Co., and its successors and/or predecessors, contributed manifested
22 waste to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Cooper LA Clear Drum Co. generated and/or arranged
24 for its disposal at the BKK Class I Facility. To date, Defendant Cooper LA Clear
25 Drum Co. has not incurred any costs at the BKK Class I Facility nor has it paid its
26 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 253. According to historical BKK Corp. records, Defendant Corrosion
28 Technology Inc., and its successors and/or predecessors, contributed manifested

1 waste to the BKK Class I Facility. This manifested waste contained Hazardous
2 Substances that Defendant Corrosion Technology Inc. generated and/or arranged
3 for its disposal at the BKK Class I Facility. To date, Defendant Corrosion
4 Technology Inc. has not incurred any costs at the BKK Class I Facility nor has it
5 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

6 254. According to historical BKK Corp. records, Defendant Cosmotronics
7 Co., and its successors and/or predecessors, contributed manifested waste to the
8 BKK Class I Facility. This manifested waste contained Hazardous Substances that
9 Defendant Cosmotronics Co. generated and/or arranged for its disposal at the BKK
10 Class I Facility. To date, Defendant Cosmotronics Co. has not incurred any costs at
11 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
12 Plaintiffs at the BKK Class I Facility.

13 255. According to historical BKK Corp. records, Defendant Coto De Caza
14 Development Corp., and its successors and/or predecessors, contributed manifested
15 waste to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Coto De Caza Development Corp. generated and/or
17 arranged for its disposal at the BKK Class I Facility. To date, Defendant Coto De
18 Caza Development Corp. has not incurred any costs at the BKK Class I Facility nor
19 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
20 Facility.

21 256. Upon information and belief, Defendant Covestro LLC is the
22 successor to Defendant Synres Chemical Corp. and/or otherwise liable for
23 manifested waste that was contributed to the BKK Class I Facility by Defendant
24 Synres Chemical Corp. According to historical BKK Corp. records, Defendant
25 Synres Chemical Corp. contributed manifested waste to the BKK Class I Facility.
26 This manifested waste contained Hazardous Substances that Defendant Synres
27 Chemical Corp. generated and/or arranged for its disposal at the BKK Class I
28 Facility. To date, Defendant Covestro LLC has not incurred any costs at the BKK

1 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
2 BKK Class I Facility.

3 257. According to historical BKK Corp. records, Defendant Crane &
4 Utterback Inc. contributed manifested waste to the BKK Class I Facility. This
5 manifested waste contained Hazardous Substances that Defendant Crane &
6 Utterback Inc. generated and/or arranged for its disposal at the BKK Class I
7 Facility. To date, Defendant Crane & Utterback Inc. has not incurred any costs at
8 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
9 Plaintiffs at the BKK Class I Facility.

10 258. According to historical BKK Corp. records, Defendant Crane-
11 Hydroaire Division, and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant Crane-Hydroaire Division generated and/or arranged for
14 its disposal at the BKK Class I Facility. To date, Defendant Crane-Hydroaire
15 Division has not incurred any costs at the BKK Class I Facility nor has it paid its
16 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

17 259. According to historical BKK Corp. records, Defendant Crescent
18 Transportation, and its successors and/or predecessors, contributed manifested
19 waste to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Defendant Crescent Transportation generated and/or arranged for
21 its disposal at the BKK Class I Facility. To date, Defendant Crescent Transportation
22 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
23 of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 260.

25 261. According to historical BKK Corp. records, Defendant Cut-Off
26 Manifest, and its successors and/or predecessors, contributed manifested waste to
27 the BKK Class I Facility. This manifested waste contained Hazardous Substances
28 that Defendant Cut-Off Manifest generated and/or arranged for its disposal at the

1 BKK Class I Facility. To date, Defendant Cut-Off Manifest has not incurred any
2 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
3 the Plaintiffs at the BKK Class I Facility.

4 262. According to historical BKK Corp. records, Defendant CWOD, and its
5 successors and/or predecessors, contributed manifested waste to the BKK Class I
6 Facility. This manifested waste contained Hazardous Substances that Defendant
7 CWOD generated and/or arranged for its disposal at the BKK Class I Facility. To
8 date, Defendant CWOD has not incurred any costs at the BKK Class I Facility nor
9 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
10 Facility.

11 263. According to historical BKK Corp. records, Defendant Cyclone
12 Excelsweld Co., and its successors and/or predecessors, contributed manifested
13 waste to the BKK Class I Facility. This manifested waste contained Hazardous
14 Substances that Defendant Cyclone Excelsweld Co. generated and/or arranged for
15 its disposal at the BKK Class I Facility. To date, Defendant Cyclone Excelsweld
16 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
17 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

18 264. According to historical BKK Corp. records, Defendant Torrance
19 Tubing and Conduit Company, formerly known as Cyprus Tubing & Conduit Co.,
20 and its successors and/or predecessors, contributed manifested waste to the BKK
21 Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Torrance Tubing and Conduit Company, formerly known as Cyprus
23 Tubing & Conduit Co. generated and/or arranged for its disposal at the BKK Class
24 I Facility. To date, Defendant Torrance Tubing and Conduit Company, formerly
25 known as Cyprus Tubing & Conduit Co. has not incurred any costs at the BKK
26 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
27 BKK Class I Facility.

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1 265. According to historical BKK Corp. records, Defendant D. E. Calta
2 International, and its successors and/or predecessors, contributed manifested waste
3 to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant D. E. Calta International generated and/or arranged for
5 its disposal at the BKK Class I Facility. To date, Defendant D. E. Calta
6 International has not incurred any costs at the BKK Class I Facility nor has it paid
7 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

8 266. According to historical BKK Corp. records, Defendant D. W. Elliott
9 Inc., and its successors and/or predecessors, contributed manifested waste to the
10 BKK Class I Facility. This manifested waste contained Hazardous Substances that
11 Defendant D. W. Elliott Inc. generated and/or arranged for its disposal at the BKK
12 Class I Facility. To date, Defendant D. W. Elliott Inc. has not incurred any costs at
13 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
14 Plaintiffs at the BKK Class I Facility.

15 267. According to historical BKK Corp. records, Defendant Damson Oil
16 Co., and its successors and/or predecessors, contributed manifested waste to the
17 BKK Class I Facility. This manifested waste contained Hazardous Substances that
18 Defendant Damson Oil Co. generated and/or arranged for its disposal at the BKK
19 Class I Facility. To date, Defendant Damson Oil Co. has not incurred any costs at
20 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
21 Plaintiffs at the BKK Class I Facility.

22 268. According to historical BKK Corp. records, Defendant Data Circuits
23 Inc., and its successors and/or predecessors, contributed manifested waste to the
24 BKK Class I Facility. This manifested waste contained Hazardous Substances that
25 Defendant Data Circuits Inc. generated and/or arranged for its disposal at the BKK
26 Class I Facility. To date, Defendant Data Circuits Inc. has not incurred any costs at
27 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
28 Plaintiffs at the BKK Class I Facility.

1 269. According to historical BKK Corp. records, Defendant Dave Beck,
2 and its successors and/or predecessors, contributed manifested waste to the BKK
3 Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant Dave Beck generated and/or arranged for its disposal at the BKK Class I
5 Facility. To date, Defendant Dave Beck has not incurred any costs at the BKK
6 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
7 BKK Class I Facility.

8 270. According to historical BKK Corp. records, Defendant Davidson Panel
9 Co., and its successors and/or predecessors, contributed manifested waste to the
10 BKK Class I Facility. This manifested waste contained Hazardous Substances that
11 Defendant Davidson Panel Co. generated and/or arranged for its disposal at the
12 BKK Class I Facility. To date, Defendant Davidson Panel Co. has not incurred any
13 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
14 the Plaintiffs at the BKK Class I Facility.

15 271. According to historical BKK Corp. records, Defendant Davis Walker
16 Co., and its successors and/or predecessors, contributed manifested waste to the
17 BKK Class I Facility. This manifested waste contained Hazardous Substances that
18 Defendant Davis Walker Co. generated and/or arranged for its disposal at the BKK
19 Class I Facility. To date, Defendant Davis Walker Co. has not incurred any costs at
20 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
21 Plaintiffs at the BKK Class I Facility.

22 272. According to historical BKK Corp. records, Defendant Dayton
23 Granger Inc., and its successors and/or predecessors, contributed manifested waste
24 to the BKK Class I Facility. This manifested waste contained Hazardous
25 Substances that Defendant Dayton Granger Inc. generated and/or arranged for its
26 disposal at the BKK Class I Facility. To date, Defendant Dayton Granger Inc. has
27 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
28 costs incurred by the Plaintiffs at the BKK Class I Facility.

1 273. According to historical BKK Corp. records, Defendant G.L.C.
2 Building Corp., formerly known as Del Amo Energy, and its successors and/or
3 predecessors, contributed manifested waste to the BKK Class I Facility. This
4 manifested waste contained Hazardous Substances that Defendant G.L.C. Building
5 Corp., formerly known as Del Amo Energy generated and/or arranged for its
6 disposal at the BKK Class I Facility. To date, Defendant G.L.C. Building Corp.,
7 formerly known as Del Amo Energy has not incurred any costs at the BKK Class I
8 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
9 Class I Facility.

10 274. According to historical BKK Corp. records, Defendant D. I. Salvo
11 Trucking, and its successors and/or predecessors, contributed manifested waste to
12 the BKK Class I Facility. This manifested waste contained Hazardous Substances
13 that Defendant D. I. Salvo Trucking generated and/or arranged for its disposal at the
14 BKK Class I Facility. To date, Defendant D. I. Salvo Trucking has not incurred any
15 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
16 the Plaintiffs at the BKK Class I Facility.

17 275. Upon information and belief, Defendant Darling Ingredients is the
18 successor to Defendant Peterson Manufacturing Co. Inc. and/or otherwise liable for
19 manifested waste that was contributed to the BKK Class I Facility by Defendant
20 Peterson Manufacturing Co. Inc. According to historical BKK Corp. records,
21 Defendant Peterson Manufacturing Co. Inc. contributed manifested waste to the
22 BKK Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant Peterson Manufacturing Co. Inc. generated and/or arranged for its
24 disposal at the BKK Class I Facility. To date, Defendant Darling Ingredients has
25 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
26 costs incurred by the Plaintiffs at the BKK Class I Facility.

27 276. Upon information and belief, Defendant Darrell Thompson Tank &
28 Construction is the successor to Defendant Thompson Tank Construction and/or

1 otherwise liable for manifested waste that was contributed to the BKK Class I
2 Facility by Defendant Thompson Tank Construction. According to historical BKK
3 Corp. records, Defendant Thompson Tank Construction contributed manifested
4 waste to the BKK Class I Facility. This manifested waste contained Hazardous
5 Substances that Defendant Thompson Tank Construction generated and/or arranged
6 for its disposal at the BKK Class I Facility. To date, Defendant Darrell Thompson
7 Tank & Construction has not incurred any costs at the BKK Class I Facility nor has
8 it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

9 277. According to historical BKK Corp. records, Defendant Dial Precision
10 Inc., and its successors and/or predecessors, contributed manifested waste to the
11 BKK Class I Facility. This manifested waste contained Hazardous Substances that
12 Defendant Dial Precision Inc. generated and/or arranged for its disposal at the BKK
13 Class I Facility. To date, Defendant Dial Precision Inc. has not incurred any costs at
14 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
15 Plaintiffs at the BKK Class I Facility.

16 278. According to historical BKK Corp. records, Defendant Diamond
17 Plastics, and its successors and/or predecessors, contributed manifested waste to the
18 BKK Class I Facility. This manifested waste contained Hazardous Substances that
19 Defendant Diamond Plastics generated and/or arranged for its disposal at the BKK
20 Class I Facility. To date, Defendant Diamond Plastics has not incurred any costs at
21 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
22 Plaintiffs at the BKK Class I Facility.

23 279. According to historical BKK Corp. records, Defendant Dibble
24 Electronics Inc., and its successors and/or predecessors, contributed manifested
25 waste to the BKK Class I Facility. This manifested waste contained Hazardous
26 Substances that Defendant Dibble Electronics Inc. generated and/or arranged for its
27 disposal at the BKK Class I Facility. To date, Defendant Dibble Electronics Inc. has
28

1 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
2 costs incurred by the Plaintiffs at the BKK Class I Facility.

3 280. According to historical BKK Corp. records, Defendant Ditronics Inc.,
4 and its successors and/or predecessors, contributed manifested waste to the BKK
5 Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Ditronics Inc. generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant Ditronics Inc. has not incurred any costs at the
8 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
9 at the BKK Class I Facility

10 281. According to historical BKK Corp. records, Defendant Ditty Drum
11 Co., and its successors and/or predecessors, contributed manifested waste to the
12 BKK Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Ditty Drum Co. generated and/or arranged for its disposal at the BKK
14 Class I Facility. To date, Defendant Ditty Drum Co. has not incurred any costs at
15 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
16 Plaintiffs at the BKK Class I Facility.

17 282. According to historical BKK Corp. records, Defendant Dominguez
18 Properties, and its successors and/or predecessors, contributed manifested waste to
19 the BKK Class I Facility. This manifested waste contained Hazardous Substances
20 that Defendant Dominguez Properties generated and/or arranged for its disposal at
21 the BKK Class I Facility. To date, Defendant Dominguez Properties has not
22 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
23 incurred by the Plaintiffs at the BKK Class I Facility.

24 283. According to historical BKK Corp. records, Defendant DME Co., and
25 its successors and/or predecessors, contributed manifested waste to the BKK Class I
26 Facility. This manifested waste contained Hazardous Substances that Defendant
27 DME Co. generated and/or arranged for its disposal at the BKK Class I Facility. To
28 date, Defendant DME Co. has not incurred any costs at the BKK Class I Facility

1 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
2 Facility.

3 284. According to historical BKK Corp. records, Defendant Downey Glass
4 Co. Inc., and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Downey Glass Co. Inc. generated and/or arranged for its disposal at the
7 BKK Class I Facility. To date, Defendant Downey Glass Co. Inc. has not incurred
8 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
9 by the Plaintiffs at the BKK Class I Facility.

10 285. According to historical BKK Corp. records, Defendant Draft Systems
11 Inc., and its successors and/or predecessors, contributed manifested waste to the
12 BKK Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Draft Systems Inc. generated and/or arranged for its disposal at the BKK
14 Class I Facility. To date, Defendant Draft Systems Inc. has not incurred any costs at
15 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
16 Plaintiffs at the BKK Class I Facility.

17 286. According to historical BKK Corp. records, Defendant Drilube Co.,
18 and its successors and/or predecessors, contributed manifested waste to the BKK
19 Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Drilube Co. generated and/or arranged for its disposal at the BKK Class
21 I Facility. To date, Defendant Drilube Co. has not incurred any costs at the BKK
22 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
23 BKK Class I Facility.

24 287. According to historical BKK Corp. records, Defendant Dubois
25 Chemical Co., and its successors and/or predecessors, contributed manifested waste
26 to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant Dubois Chemical Co. generated and/or arranged for its
28 disposal at the BKK Class I Facility. To date, Defendant Dubois Chemical Co. has

1 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
2 costs incurred by the Plaintiffs at the BKK Class I Facility.

3 288. According to historical BKK Corp. records, Defendant Dyanco Inc.,
4 and its successors and/or predecessors, contributed manifested waste to the BKK
5 Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Dyanco Inc. generated and/or arranged for its disposal at the BKK Class
7 I Facility. To date, Defendant Dyanco Inc. has not incurred any costs at the BKK
8 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
9 BKK Class I Facility.

10 289. According to historical BKK Corp. records, Defendant Dyer He Inc.,
11 and its successors and/or predecessors, contributed manifested waste to the BKK
12 Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Dyer He Inc. generated and/or arranged for its disposal at the BKK Class
14 I Facility. To date, Defendant Dyer He Inc. has not incurred any costs at the BKK
15 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
16 BKK Class I Facility.

17 290. According to historical BKK Corp. records, Defendant Dyna Plate
18 Inc., and its successors and/or predecessors, contributed manifested waste to the
19 BKK Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Dyna Plate Inc. generated and/or arranged for its disposal at the BKK
21 Class I Facility. To date, Defendant Dyna Plate Inc. has not incurred any costs at
22 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
23 Plaintiffs at the BKK Class I Facility.

24 291. According to historical BKK Corp. records, Defendant Dyna Shield
25 Inc., and its successors and/or predecessors, contributed manifested waste to the
26 BKK Class I Facility. This manifested waste contained Hazardous Substances that
27 Defendant Dyna Shield Inc. generated and/or arranged for its disposal at the BKK
28 Class I Facility. To date, Defendant Dyna Shield Inc. has not incurred any costs at

1 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
2 Plaintiffs at the BKK Class I Facility.

3 292. According to historical BKK Corp. records, Defendant E. & M.
4 Builders, and its successors and/or predecessors, contributed manifested waste to
5 the BKK Class I Facility. This manifested waste contained Hazardous Substances
6 that Defendant E. & M. Builders generated and/or arranged for its disposal at the
7 BKK Class I Facility. To date, Defendant E. & M. Builders has not incurred any
8 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
9 the Plaintiffs at the BKK Class I Facility.

10 293. According to historical BKK Corp. records, Defendant East Los
11 Angeles College, and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant East Los Angeles College generated and/or arranged for
14 its disposal at the BKK Class I Facility. To date, Defendant East Los Angeles
15 College has not incurred any costs at the BKK Class I Facility nor has it paid its fair
16 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

17 294. According to historical BKK Corp. records, Defendant Eco Petroleum
18 Inc., and its successors and/or predecessors, contributed manifested waste to the
19 BKK Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Eco Petroleum Inc. generated and/or arranged for its disposal at the
21 BKK Class I Facility. To date, Defendant Eco Petroleum Inc. has not incurred any
22 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
23 the Plaintiffs at the BKK Class I Facility.

24 295. According to historical BKK Corp. records, Defendant Ecology
25 Control Industries, and its successors and/or predecessors, contributed manifested
26 waste to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant Ecology Control Industries generated and/or arranged
28 for its disposal at the BKK Class I Facility. To date, Defendant Ecology Control

1 Industries has not incurred any costs at the BKK Class I Facility nor has it paid its
2 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 296. According to historical BKK Corp. records, Defendant Edmund Grey,
4 and its successors and/or predecessors, contributed manifested waste to the BKK
5 Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Edmund Grey generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant Edmund Grey has not incurred any costs at the
8 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
9 at the BKK Class I Facility.

10 297. According to historical BKK Corp. records, Defendant Eeco Inc., and
11 its successors and/or predecessors, contributed manifested waste to the BKK Class I
12 Facility. This manifested waste contained Hazardous Substances that Defendant
13 Eeco Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To
14 date, Defendant Eeco Inc. has not incurred any costs at the BKK Class I Facility nor
15 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
16 Facility.

17 298. According to historical BKK Corp. records, Defendant El Castillo Real
18 Restaurant, and its successors and/or predecessors, contributed manifested waste to
19 the BKK Class I Facility. This manifested waste contained Hazardous Substances
20 that Defendant El Castillo Real Restaurant generated and/or arranged for its
21 disposal at the BKK Class I Facility. To date, Defendant El Castillo Real
22 Restaurant has not incurred any costs at the BKK Class I Facility nor has it paid its
23 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 299. According to historical BKK Corp. records, Defendant El Monte Lead
25 Salvage Co. Inc., and its successors and/or predecessors, contributed manifested
26 waste to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant El Monte Lead Salvage Co. Inc. generated and/or
28 arranged for its disposal at the BKK Class I Facility. To date, Defendant El Monte

1 Lead Salvage Co. Inc. has not incurred any costs at the BKK Class I Facility nor
2 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
3 Facility.

4 300. According to historical BKK Corp. records, Defendant El Monte Tool
5 & Die, and its successors and/or predecessors, contributed manifested waste to the
6 BKK Class I Facility. This manifested waste contained Hazardous Substances that
7 Defendant El Monte Tool & Die generated and/or arranged for its disposal at the
8 BKK Class I Facility. To date, Defendant El Monte Tool & Die has not incurred
9 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
10 by the Plaintiffs at the BKK Class I Facility.

11 301. According to historical BKK Corp. records, Defendant Electra Motors,
12 and its successors and/or predecessors, contributed manifested waste to the BKK
13 Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant Electra Motors generated and/or arranged for its disposal at the BKK
15 Class I Facility. To date, Defendant Electra Motors has not incurred any costs at the
16 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
17 at the BKK Class I Facility.

18 302. According to historical BKK Corp. records, Defendant Electro
19 Adapter Inc., and its successors and/or predecessors, contributed manifested waste
20 to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Defendant Electro Adapter Inc. generated and/or arranged for its
22 disposal at the BKK Class I Facility. To date, Defendant Electro Adapter Inc. has
23 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
24 costs incurred by the Plaintiffs at the BKK Class I Facility.

25 303. According to historical BKK Corp. records, Defendant Electron
26 Plating, and its successors and/or predecessors, contributed manifested waste to the
27 BKK Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Electron Plating generated and/or arranged for its disposal at the BKK

1 Class I Facility. To date, Defendant Electron Plating has not incurred any costs at
2 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
3 Plaintiffs at the BKK Class I Facility.

4 304. According to historical BKK Corp. records, Defendant Electronic
5 Plating Service Inc., and its successors and/or predecessors, contributed manifested
6 waste to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Electronic Plating Service Inc. generated and/or
8 arranged for its disposal at the BKK Class I Facility. To date, Defendant Electronic
9 Plating Service Inc. has not incurred any costs at the BKK Class I Facility nor has it
10 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

11 305. According to historical BKK Corp. records, Defendant Electronic
12 Reclamation Service, and its successors and/or predecessors, contributed
13 manifested waste to the BKK Class I Facility. This manifested waste contained
14 Hazardous Substances that Defendant Electronic Reclamation Service generated
15 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
16 Electronic Reclamation Service has not incurred any costs at the BKK Class I
17 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
18 Class I Facility.

19 306. According to historical BKK Corp. records, Defendant Energy
20 Production & Sales, and its successors and/or predecessors, contributed manifested
21 waste to the BKK Class I Facility. This manifested waste contained Hazardous
22 Substances that Defendant Energy Production & Sales generated and/or arranged
23 for its disposal at the BKK Class I Facility. To date, Defendant Energy Production
24 & Sales has not incurred any costs at the BKK Class I Facility nor has it paid its fair
25 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

26 307. According to historical BKK Corp. records, Defendant Engard
27 Coatings Corp., and its successors and/or predecessors, contributed manifested
28 waste to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Defendant Engard Coatings Corp. generated and/or arranged for its
2 disposal at the BKK Class I Facility. To date, Defendant Engard Coatings Corp. has
3 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
4 costs incurred by the Plaintiffs at the BKK Class I Facility.

5 308. According to historical BKK Corp. records, Defendant Environmentals
6 Inc., and its successors and/or predecessors, contributed manifested waste to the
7 BKK Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Environmentals Inc. generated and/or arranged for its disposal at the
9 BKK Class I Facility. To date, Defendant Environmentals Inc. has not incurred any
10 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
11 the Plaintiffs at the BKK Class I Facility.

12 309. According to historical BKK Corp. records, Defendant ESB Inc., and
13 its successors and/or predecessors, contributed manifested waste to the BKK Class I
14 Facility. This manifested waste contained Hazardous Substances that Defendant
15 ESB Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To
16 date, Defendant ESB Inc. has not incurred any costs at the BKK Class I Facility nor
17 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
18 Facility.

19 310. According to historical BKK Corp. records, Defendant Eskimo
20 Radiator Manufacturing Co., and its successors and/or predecessors, contributed
21 manifested waste to the BKK Class I Facility. This manifested waste contained
22 Hazardous Substances that Defendant Eskimo Radiator Manufacturing Co.
23 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
24 Defendant Eskimo Radiator Manufacturing Co. has not incurred any costs at the
25 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
26 at the BKK Class I Facility.

27 311. According to historical BKK Corp. records, Defendant Estee Battery
28 Co., and its successors and/or predecessors, contributed manifested waste to the

1 BKK Class I Facility. This manifested waste contained Hazardous Substances that
2 Defendant Estee Battery Co. generated and/or arranged for its disposal at the BKK
3 Class I Facility. To date, Defendant Estee Battery Co. has not incurred any costs at
4 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
5 Plaintiffs at the BKK Class I Facility.

6 312. According to historical BKK Corp. records, Defendant Everest &
7 Jennings Co. Inc., and its successors and/or predecessors, contributed manifested
8 waste to the BKK Class I Facility. This manifested waste contained Hazardous
9 Substances that Defendant Everest & Jennings Co. Inc. generated and/or arranged
10 for its disposal at the BKK Class I Facility. To date, Defendant Everest & Jennings
11 Co. Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its
12 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

13 313. According to historical BKK Corp. records, Defendant Faith Plating
14 Co., and its successors and/or predecessors, contributed manifested waste to the
15 BKK Class I Facility. This manifested waste contained Hazardous Substances that
16 Defendant Faith Plating Co. generated and/or arranged for its disposal at the BKK
17 Class I Facility. To date, Defendant Faith Plating Co. has not incurred any costs at
18 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
19 Plaintiffs at the BKK Class I Facility.

20 314. According to historical BKK Corp. records, Defendant Fansteel
21 Precision Sheet Metal, and its successors and/or predecessors, contributed
22 manifested waste to the BKK Class I Facility. This manifested waste contained
23 Hazardous Substances that Defendant Fansteel Precision Sheet Metal generated
24 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
25 Fansteel Precision Sheet Metal has not incurred any costs at the BKK Class I
26 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
27 Class I Facility.

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1 315. Upon information and belief, Defendant Fela Management AG is the
2 successor to Defendant Fela Precision Inc. and/or otherwise liable for manifested
3 waste that was contributed to the BKK Class I Facility by Defendant Fela Precision
4 Inc. According to historical BKK Corp. records, Defendant Fela Precision Inc.
5 contributed manifested waste to the BKK Class I Facility. This manifested waste
6 contained Hazardous Substances that Defendant Fela Precision Inc. generated
7 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
8 Fela Management AG has not incurred any costs at the BKK Class I Facility nor
9 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
10 Facility.

11 316. According to historical BKK Corp. records, Defendant Fela Precision
12 Inc., and its successors and/or predecessors, contributed manifested waste to the
13 BKK Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant Fela Precision Inc. generated and/or arranged for its disposal at the BKK
15 Class I Facility. To date, Defendant Fela Precision Inc. has not incurred any costs at
16 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
17 Plaintiffs at the BKK Class I Facility.

18 317. Upon information and belief, Defendant FG Group Holdings Inc. is the
19 successor to Defendant Pichel Industries Inc. and/or otherwise liable for manifested
20 waste that was contributed to the BKK Class I Facility by Defendant Pichel
21 Industries Inc. According to historical BKK Corp. records, Defendant Pichel
22 Industries Inc. contributed manifested waste to the BKK Class I Facility. This
23 manifested waste contained Hazardous Substances that Defendant Pichel Industries
24 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
25 Defendant FG Group Holdings Inc. has not incurred any costs at the BKK Class I
26 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
27 Class I Facility.

28

1 318. According to historical BKK Corp. records, Defendant First National
2 Finance Corp., and its successors and/or predecessors, contributed manifested waste
3 to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant First National Finance Corp. generated and/or arranged
5 for its disposal at the BKK Class I Facility. To date, Defendant First National
6 Finance Corp. has not incurred any costs at the BKK Class I Facility nor has it paid
7 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

8 319. According to historical BKK Corp. records, Defendant Fix & Brain
9 Vacuum Truck Service, and its successors and/or predecessors, contributed
10 manifested waste to the BKK Class I Facility. This manifested waste contained
11 Hazardous Substances that Defendant Fix & Brain Vacuum Truck Service
12 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
13 Defendant Fix & Brain Vacuum Truck Service has not incurred any costs at the
14 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
15 at the BKK Class I Facility.

16 320. According to historical BKK Corp. records, Defendant Flask
17 Chemical, and its successors and/or predecessors, contributed manifested waste to
18 the BKK Class I Facility. This manifested waste contained Hazardous Substances
19 that Defendant Flask Chemical generated and/or arranged for its disposal at the
20 BKK Class I Facility. To date, Defendant Flask Chemical has not incurred any
21 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
22 the Plaintiffs at the BKK Class I Facility.

23 321. According to historical BKK Corp. records, Defendant Flintkote Co.,
24 and its successors and/or predecessors, contributed manifested waste to the BKK
25 Class I Facility. This manifested waste contained Hazardous Substances that
26 Defendant Flintkote Co. generated and/or arranged for its disposal at the BKK
27 Class I Facility. To date, Defendant Flintkote Co. has not incurred any costs at the
28

1 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
2 at the BKK Class I Facility.

3 322. According to historical BKK Corp. records, Defendant Flynn's Plating
4 Co., and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Flynn's Plating Co. generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant Flynn's Plating Co. has not incurred any costs at
8 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
9 Plaintiffs at the BKK Class I Facility.

10 323. According to historical BKK Corp. records, Defendant Fontana Truck
11 Wash, and its successors and/or predecessors, contributed manifested waste to the
12 BKK Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Fontana Truck Wash generated and/or arranged for its disposal at the
14 BKK Class I Facility. To date, Defendant Fontana Truck Wash has not incurred any
15 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
16 the Plaintiffs at the BKK Class I Facility.

17 324. According to historical BKK Corp. records, Defendant Forro Precision
18 Co., and its successors and/or predecessors, contributed manifested waste to the
19 BKK Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Forro Precision Co. generated and/or arranged for its disposal at the
21 BKK Class I Facility. To date, Defendant Forro Precision Co. has not incurred any
22 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
23 the Plaintiffs at the BKK Class I Facility.

24 325. According to historical BKK Corp. records, Defendant Fortin
25 Laminating Corp., and its successors and/or predecessors, contributed manifested
26 waste to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant Fortin Laminating Corp. generated and/or arranged for
28 its disposal at the BKK Class I Facility. To date, Defendant Fortin Laminating

1 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
2 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 326. According to historical BKK Corp. records, Defendant Four Star
4 Chemical Co., and its successors and/or predecessors, contributed manifested waste
5 to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant Four Star Chemical Co. generated and/or arranged for its
7 disposal at the BKK Class I Facility. To date, Defendant Four Star Chemical Co.
8 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
9 of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 327. According to historical BKK Corp. records, Defendant Four Star
11 Container Inc., and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant Four Star Container Inc. generated and/or arranged for
14 its disposal at the BKK Class I Facility. To date, Defendant Four Star Container
15 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
16 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

17 328. According to historical BKK Corp. records, Defendant Four Star
18 Disposal Co., and its successors and/or predecessors, contributed manifested waste
19 to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Defendant Four Star Disposal Co. generated and/or arranged for its
21 disposal at the BKK Class I Facility. To date, Defendant Four Star Disposal Co. has
22 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
23 costs incurred by the Plaintiffs at the BKK Class I Facility.

24 329. According to historical BKK Corp. records, Defendant Freeborn
25 Equipment Co. Inc., and its successors and/or predecessors, contributed manifested
26 waste to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant Freeborn Equipment Co. Inc. generated and/or arranged
28 for its disposal at the BKK Class I Facility. To date, Defendant Freeborn

1 Equipment Co. Inc. has not incurred any costs at the BKK Class I Facility nor has it
2 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 330. According to historical BKK Corp. records, Defendant Fresno Unified
4 School District, and its successors and/or predecessors, contributed manifested
5 waste to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant Fresno Unified School District generated and/or
7 arranged for its disposal at the BKK Class I Facility. To date, Defendant Fresno
8 Unified School District has not incurred any costs at the BKK Class I Facility nor
9 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
10 Facility.

11 331. According to historical BKK Corp. records, Defendant Frontier
12 Commodore Inc., and its successors and/or predecessors, contributed manifested
13 waste to the BKK Class I Facility. This manifested waste contained Hazardous
14 Substances that Defendant Frontier Commodore Inc. generated and/or arranged for
15 its disposal at the BKK Class I Facility. To date, Defendant Frontier Commodore
16 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
17 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

18 332. According to historical BKK Corp. records, Defendant Frontier
19 Container Corp., and its successors and/or predecessors, contributed manifested
20 waste to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Defendant Frontier Container Corp. generated and/or arranged for
22 its disposal at the BKK Class I Facility. To date, Defendant Frontier Container
23 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
24 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

25 333. According to historical BKK Corp. records, Defendant Fullerton Joint
26 Union School District, and its successors and/or predecessors, contributed
27 manifested waste to the BKK Class I Facility. This manifested waste contained
28 Hazardous Substances that Defendant Fullerton Joint Union School District

1 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
2 Defendant Fullerton Joint Union School District has not incurred any costs at the
3 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
4 at the BKK Class I Facility.

5 334. According to historical BKK Corp. records, Defendant G. R. Nance
6 Co. Inc., and its successors and/or predecessors, contributed manifested waste to the
7 BKK Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant G. R. Nance Co. Inc. generated and/or arranged for its disposal at the
9 BKK Class I Facility. To date, Defendant G. R. Nance Co. Inc. has not incurred any
10 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
11 the Plaintiffs at the BKK Class I Facility.

12 335. According to historical BKK Corp. records, Defendant G. T. Bicycles
13 Inc., and its successors and/or predecessors, contributed manifested waste to the
14 BKK Class I Facility. This manifested waste contained Hazardous Substances that
15 Defendant G. T. Bicycles Inc. generated and/or arranged for its disposal at the BKK
16 Class I Facility. To date, Defendant G. T. Bicycles Inc. has not incurred any costs at
17 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
18 Plaintiffs at the BKK Class I Facility.

19 336. According to historical BKK Corp. records, Defendant Gainey
20 Ceramics, and its successors and/or predecessors, contributed manifested waste to
21 the BKK Class I Facility. This manifested waste contained Hazardous Substances
22 that Defendant Gainey Ceramics generated and/or arranged for its disposal at the
23 BKK Class I Facility. To date, Defendant Gainey Ceramics has not incurred any
24 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
25 the Plaintiffs at the BKK Class I Facility.

26 337. According to historical BKK Corp. records, Defendant Gardena
27 Plating Co., and its successors and/or predecessors, contributed manifested waste to
28 the BKK Class I Facility. This manifested waste contained Hazardous Substances

1 that Defendant Gardena Plating Co. generated and/or arranged for its disposal at the
2 BKK Class I Facility. To date, Defendant Gardena Plating Co. has not incurred any
3 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
4 the Plaintiffs at the BKK Class I Facility.

5 338. According to historical BKK Corp. records, Defendant Garhauer
6 Marine Corp., and its successors and/or predecessors, contributed manifested waste
7 to the BKK Class I Facility. This manifested waste contained Hazardous
8 Substances that Defendant Garhauer Marine Corp. generated and/or arranged for its
9 disposal at the BKK Class I Facility. To date, Defendant Garhauer Marine Corp.
10 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
11 of costs incurred by the Plaintiffs at the BKK Class I Facility.

12 339. According to historical BKK Corp. records, Defendant Garrett
13 Research, and its successors and/or predecessors, contributed manifested waste to
14 the BKK Class I Facility. This manifested waste contained Hazardous Substances
15 that Defendant Garrett Research generated and/or arranged for its disposal at the
16 BKK Class I Facility. To date, Defendant Garrett Research has not incurred any
17 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
18 the Plaintiffs at the BKK Class I Facility.

19 340. Upon information and belief, Gel Industries, Inc. is the successor to
20 Quality Aluminum Forge Co. and/or otherwise liable for such manifested waste that
21 was contributed to the BKK Class I Facility by Quality Aluminum Forge.
22 According to historical BKK Corp. records, Defendant Quality Aluminum Forge
23 Co. contributed manifested waste to the BKK Class I Facility. This manifested
24 waste contained Hazardous Substances that Defendant Quality Aluminum Forge
25 Co. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
26 Defendant Quality Aluminum Forge Co. has not incurred any costs at the BKK
27 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
28 BKK Class I Facility.

1 341. According to historical BKK Corp. records, Defendant Genes Plating
2 & Spectrum Co., and its successors and/or predecessors, contributed manifested
3 waste to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant Genes Plating & Spectrum Co. generated and/or
5 arranged for its disposal at the BKK Class I Facility. To date, Defendant Genes
6 Plating & Spectrum Co. has not incurred any costs at the BKK Class I Facility nor
7 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
8 Facility.

9 342. According to historical BKK Corp. records, Defendant George
10 Industries Inc., and its successors and/or predecessors, contributed manifested
11 waste to the BKK Class I Facility. This manifested waste contained Hazardous
12 Substances that Defendant George Industries Inc. generated and/or arranged for its
13 disposal at the BKK Class I Facility. To date, Defendant George Industries Inc. has
14 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
15 costs incurred by the Plaintiffs at the BKK Class I Facility.

16 343. According to historical BKK Corp. records, Defendant Gerard Metal
17 Craftsmen Inc., and its successors and/or predecessors, contributed manifested
18 waste to the BKK Class I Facility. This manifested waste contained Hazardous
19 Substances that Defendant Gerard Metal Craftsmen Inc. generated and/or arranged
20 for its disposal at the BKK Class I Facility. To date, Defendant Gerard Metal
21 Craftsmen Inc. has not incurred any costs at the BKK Class I Facility nor has it paid
22 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 344. According to historical BKK Corp. records, Defendant Gillespie
24 Furniture Manufacturing, and its successors and/or predecessors, contributed
25 manifested waste to the BKK Class I Facility. This manifested waste contained
26 Hazardous Substances that Defendant Gillespie Furniture Manufacturing generated
27 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
28 Gillespie Furniture Manufacturing has not incurred any costs at the BKK Class I

1 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
2 Class I Facility.

3 345. According to historical BKK Corp. records, Defendant Gilmore
4 Envelope Corp., and its successors and/or predecessors, contributed manifested
5 waste to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant Gilmore Envelope Corp. generated and/or arranged for
7 its disposal at the BKK Class I Facility. To date, Defendant Gilmore Envelope
8 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
9 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 346. According to historical BKK Corp. records, Defendant Glass Arts, and
11 its successors and/or predecessors, contributed manifested waste to the BKK Class I
12 Facility. This manifested waste contained Hazardous Substances that Defendant
13 Glass Arts generated and/or arranged for its disposal at the BKK Class I Facility.
14 To date, Defendant Glass Arts has not incurred any costs at the BKK Class I
15 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
16 Class I Facility.

17 347. According to historical BKK Corp. records, Defendant Glen Air Inc.,
18 and its successors and/or predecessors, contributed manifested waste to the BKK
19 Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Glen Air Inc. generated and/or arranged for its disposal at the BKK
21 Class I Facility. To date, Defendant Glen Air Inc. has not incurred any costs at the
22 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
23 at the BKK Class I Facility.

24 348. According to historical BKK Corp. records, Defendant Glendale
25 Unified School District, and its successors and/or predecessors, contributed
26 manifested waste to the BKK Class I Facility. This manifested waste contained
27 Hazardous Substances that Defendant Glendale Unified School District generated
28 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant

1 Glendale Unified School District has not incurred any costs at the BKK Class I
2 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
3 Class I Facility.

4 349. According to historical BKK Corp. records, Defendant Globe Meat
5 Packing, and its successors and/or predecessors, contributed manifested waste to
6 the BKK Class I Facility. This manifested waste contained Hazardous Substances
7 that Defendant Globe Meat Packing generated and/or arranged for its disposal at the
8 BKK Class I Facility. To date, Defendant Globe Meat Packing has not incurred any
9 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
10 the Plaintiffs at the BKK Class I Facility.

11 350. According to historical BKK Corp. records, Defendant Gold Pack
12 Meat Co., and its successors and/or predecessors, contributed manifested waste to
13 the BKK Class I Facility. This manifested waste contained Hazardous Substances
14 that Defendant Gold Pack Meat Co. generated and/or arranged for its disposal at the
15 BKK Class I Facility. To date, Defendant Gold Pack Meat Co. has not incurred any
16 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
17 the Plaintiffs at the BKK Class I Facility.

18 351. According to historical BKK Corp. records, Defendant Golden West
19 Airlines, and its successors and/or predecessors, contributed manifested waste to
20 the BKK Class I Facility. This manifested waste contained Hazardous Substances
21 that Defendant Golden West Airlines generated and/or arranged for its disposal at
22 the BKK Class I Facility. To date, Defendant Golden West Airlines has not
23 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
24 incurred by the Plaintiffs at the BKK Class I Facility.

25 352. According to historical BKK Corp. records, Defendant Golden Wool
26 Co., and its successors and/or predecessors, contributed manifested waste to the
27 BKK Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Golden Wool Co. generated and/or arranged for its disposal at the BKK

1 Class I Facility. To date, Defendant Golden Wool Co. has not incurred any costs at
2 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
3 Plaintiffs at the BKK Class I Facility.

4 353. According to historical BKK Corp. records, Defendant Good Tables
5 Inc., and its successors and/or predecessors, contributed manifested waste to the
6 BKK Class I Facility. This manifested waste contained Hazardous Substances that
7 Defendant Good Tables Inc. generated and/or arranged for its disposal at the BKK
8 Class I Facility. To date, Defendant Good Tables Inc. has not incurred any costs at
9 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
10 Plaintiffs at the BKK Class I Facility.

11 354. According to historical BKK Corp. records, Defendant GPS Industries,
12 and its successors and/or predecessors, contributed manifested waste to the BKK
13 Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant GPS Industries generated and/or arranged for its disposal at the BKK
15 Class I Facility. To date, Defendant GPS Industries has not incurred any costs at the
16 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
17 at the BKK Class I Facility.

18 355. According to historical BKK Corp. records, Defendant Graphic
19 Research Inc., and its successors and/or predecessors, contributed manifested waste
20 to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Defendant Graphic Research Inc. generated and/or arranged for its
22 disposal at the BKK Class I Facility. To date, Defendant Graphic Research Inc. has
23 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
24 costs incurred by the Plaintiffs at the BKK Class I Facility.

25 356. According to historical BKK Corp. records, Defendant Gravure West,
26 and its successors and/or predecessors, contributed manifested waste to the BKK
27 Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Gravure West generated and/or arranged for its disposal at the BKK

1 Class I Facility. To date, Defendant Gravure West has not incurred any costs at the
2 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
3 at the BKK Class I Facility.

4 357. According to historical BKK Corp. records, Defendant Greer Products,
5 and its successors and/or predecessors, contributed manifested waste to the BKK
6 Class I Facility. This manifested waste contained Hazardous Substances that
7 Defendant Greer Products generated and/or arranged for its disposal at the BKK
8 Class I Facility. To date, Defendant Greer Products has not incurred any costs at the
9 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
10 at the BKK Class I Facility.

11 358. According to historical BKK Corp. records, Defendant Grefco Inc.,
12 and its successors and/or predecessors, contributed manifested waste to the BKK
13 Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant Grefco Inc. generated and/or arranged for its disposal at the BKK Class I
15 Facility. To date, Defendant Grefco Inc. has not incurred any costs at the BKK
16 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
17 BKK Class I Facility.

18 359. According to historical BKK Corp. records, Defendant Gregg
19 Industries Inc., and its successors and/or predecessors, contributed manifested
20 waste to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Defendant Gregg Industries Inc. generated and/or arranged for its
22 disposal at the BKK Class I Facility. To date, Defendant Gregg Industries Inc. has
23 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
24 costs incurred by the Plaintiffs at the BKK Class I Facility.

25 360. According to historical BKK Corp. records, Defendant Grindley
26 Manufacturing Inc., and its successors and/or predecessors, contributed manifested
27 waste to the BKK Class I Facility. This manifested waste contained Hazardous
28 Substances that Defendant Grindley Manufacturing Inc. generated and/or arranged

1 for its disposal at the BKK Class I Facility. To date, Defendant Grindley
2 Manufacturing Inc. has not incurred any costs at the BKK Class I Facility nor has it
3 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

4 361. According to historical BKK Corp. records, Defendant Grover
5 Products Co., and its successors and/or predecessors, contributed manifested waste
6 to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Grover Products Co. generated and/or arranged for its
8 disposal at the BKK Class I Facility. To date, Defendant Grover Products Co. has
9 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
10 costs incurred by the Plaintiffs at the BKK Class I Facility.

11 362. According to historical BKK Corp. records, Defendant H. & A. Plating
12 Co., and its successors and/or predecessors, contributed manifested waste to the
13 BKK Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant H. & A. Plating Co. generated and/or arranged for its disposal at the
15 BKK Class I Facility. To date, Defendant H. & A. Plating Co. has not incurred any
16 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
17 the Plaintiffs at the BKK Class I Facility.

18 363. According to historical BKK Corp. records, Defendant H. & C.
19 Disposal, and its successors and/or predecessors, contributed manifested waste to
20 the BKK Class I Facility. This manifested waste contained Hazardous Substances
21 that Defendant H. & C. Disposal generated and/or arranged for its disposal at the
22 BKK Class I Facility. To date, Defendant H. & C. Disposal has not incurred any
23 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
24 the Plaintiffs at the BKK Class I Facility.

25 364. According to historical BKK Corp. records, Defendant H. H.
26 Robertson Co., and its successors and/or predecessors, contributed manifested
27 waste to the BKK Class I Facility. This manifested waste contained Hazardous
28 Substances that Defendant H. H. Robertson Co. generated and/or arranged for its

1 disposal at the BKK Class I Facility. To date, Defendant H. H. Robertson Co. has
2 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
3 costs incurred by the Plaintiffs at the BKK Class I Facility.

4 365. According to historical BKK Corp. records, Defendant H. Krasne
5 Manufacturing Co. Inc., and its successors and/or predecessors, contributed
6 manifested waste to the BKK Class I Facility. This manifested waste contained
7 Hazardous Substances that Defendant H. Krasne Manufacturing Co. Inc. generated
8 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant H.
9 Krasne Manufacturing Co. Inc. has not incurred any costs at the BKK Class I
10 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
11 Class I Facility.

12 366. According to historical BKK Corp. records, Defendant Hall Heat
13 Treating Co., and its successors and/or predecessors, contributed manifested waste
14 to the BKK Class I Facility. This manifested waste contained Hazardous
15 Substances that Defendant Hall Heat Treating Co. generated and/or arranged for its
16 disposal at the BKK Class I Facility. To date, Defendant Hall Heat Treating Co. has
17 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
18 costs incurred by the Plaintiffs at the BKK Class I Facility.

19 367. According to historical BKK Corp. records, Defendant Hamilton
20 Construction Co., and its successors and/or predecessors, contributed manifested
21 waste to the BKK Class I Facility. This manifested waste contained Hazardous
22 Substances that Defendant Hamilton Construction Co. generated and/or arranged
23 for its disposal at the BKK Class I Facility. To date, Defendant Hamilton
24 Construction Co. has not incurred any costs at the BKK Class I Facility nor has it
25 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

26 368. According to historical BKK Corp. records, Defendant Hampton Oil
27 Co., and its successors and/or predecessors, contributed manifested waste to the
28 BKK Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant Hampton Oil Co. generated and/or arranged for its disposal at the BKK
2 Class I Facility. To date, Defendant Hampton Oil Co. has not incurred any costs at
3 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
4 Plaintiffs at the BKK Class I Facility.

5 369. According to historical BKK Corp. records, Defendant Hanks Service
6 Station Maintenance Inc., and its successors and/or predecessors, contributed
7 manifested waste to the BKK Class I Facility. This manifested waste contained
8 Hazardous Substances that Defendant Hanks Service Station Maintenance Inc.
9 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
10 Defendant Hanks Service Station Maintenance Inc. has not incurred any costs at the
11 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
12 at the BKK Class I Facility.

13 370. According to historical BKK Corp. records, Defendant Harland M.
14 Brown & Co., and its successors and/or predecessors, contributed manifested waste
15 to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Harland M. Brown & Co. generated and/or arranged for
17 its disposal at the BKK Class I Facility. To date, Defendant Harland M. Brown &
18 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
19 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

20 371. According to historical BKK Corp. records, Defendant Harlyn
21 Products Inc., and its successors and/or predecessors, contributed manifested waste
22 to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Harlyn Products Inc. generated and/or arranged for its
24 disposal at the BKK Class I Facility. To date, Defendant Harlyn Products Inc. has
25 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
26 costs incurred by the Plaintiffs at the BKK Class I Facility.

27 372. According to historical BKK Corp. records, Defendant Harpers of
28 California, and its successors and/or predecessors, contributed manifested waste to

1 the BKK Class I Facility. This manifested waste contained Hazardous Substances
2 that Defendant Harpers of California generated and/or arranged for its disposal at
3 the BKK Class I Facility. To date, Defendant Harpers of California has not incurred
4 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
5 by the Plaintiffs at the BKK Class I Facility.

6 373. According to historical BKK Corp. records, Defendant Harris Tube
7 Inc., and its successors and/or predecessors, contributed manifested waste to the
8 BKK Class I Facility. This manifested waste contained Hazardous Substances that
9 Defendant Harris Tube Inc. generated and/or arranged for its disposal at the BKK
10 Class I Facility. To date, Defendant Harris Tube Inc. has not incurred any costs at
11 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
12 Plaintiffs at the BKK Class I Facility.

13 374. According to historical BKK Corp. records, Defendant Hartley Co.,
14 and its successors and/or predecessors, contributed manifested waste to the BKK
15 Class I Facility. This manifested waste contained Hazardous Substances that
16 Defendant Hartley Co. generated and/or arranged for its disposal at the BKK Class
17 I Facility. To date, Defendant Hartley Co. has not incurred any costs at the BKK
18 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
19 BKK Class I Facility.

20 375. According to historical BKK Corp. records, Defendant Hartwell Corp.,
21 and its successors and/or predecessors, contributed manifested waste to the BKK
22 Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant Hartwell Corp. generated and/or arranged for its disposal at the BKK
24 Class I Facility. To date, Defendant Hartwell Corp. has not incurred any costs at the
25 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
26 at the BKK Class I Facility.

27 376. According to historical BKK Corp. records, Defendant Headnall Inc.,
28 and its successors and/or predecessors, contributed manifested waste to the BKK

1 Class I Facility. This manifested waste contained Hazardous Substances that
2 Defendant Headnall Inc. generated and/or arranged for its disposal at the BKK
3 Class I Facility. To date, Defendant Headnall Inc. has not incurred any costs at the
4 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
5 at the BKK Class I Facility.

6 377. According to historical BKK Corp. records, Defendant Heads Up
7 Industries, and its successors and/or predecessors, contributed manifested waste to
8 the BKK Class I Facility. This manifested waste contained Hazardous Substances
9 that Defendant Heads Up Industries generated and/or arranged for its disposal at the
10 BKK Class I Facility. To date, Defendant Heads Up Industries has not incurred any
11 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
12 the Plaintiffs at the BKK Class I Facility.

13 378. According to historical BKK Corp. records, Defendant Hercules Oil
14 Co., and its successors and/or predecessors, contributed manifested waste to the
15 BKK Class I Facility. This manifested waste contained Hazardous Substances that
16 Defendant Hercules Oil Co. generated and/or arranged for its disposal at the BKK
17 Class I Facility. To date, Defendant Hercules Oil Co. has not incurred any costs at
18 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
19 Plaintiffs at the BKK Class I Facility.

20 379. According to historical BKK Corp. records, Defendant Hermetic
21 Systems Inc., and its successors and/or predecessors, contributed manifested waste
22 to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Hermetic Systems Inc. generated and/or arranged for its
24 disposal at the BKK Class I Facility. To date, Defendant Hermetic Systems Inc. has
25 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
26 costs incurred by the Plaintiffs at the BKK Class I Facility.

27 380. According to historical BKK Corp. records, Defendant Highland
28 Plating Co., and its successors and/or predecessors, contributed manifested waste to

1 the BKK Class I Facility. This manifested waste contained Hazardous Substances
2 that Defendant Highland Plating Co. generated and/or arranged for its disposal at
3 the BKK Class I Facility. To date, Defendant Highland Plating Co. has not incurred
4 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
5 by the Plaintiffs at the BKK Class I Facility.

6 381. According to historical BKK Corp. records, Defendant Hines
7 Wholesale Nurseries, and its successors and/or predecessors, contributed
8 manifested waste to the BKK Class I Facility. This manifested waste contained
9 Hazardous Substances that Defendant Hines Wholesale Nurseries generated and/or
10 arranged for its disposal at the BKK Class I Facility. To date, Defendant Hines
11 Wholesale Nurseries has not incurred any costs at the BKK Class I Facility nor has
12 it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

13 382. According to historical BKK Corp. records, Defendant Hi-Production
14 Forge Co., and its successors and/or predecessors, contributed manifested waste to
15 the BKK Class I Facility. This manifested waste contained Hazardous Substances
16 that Defendant Hi-Production Forge Co. generated and/or arranged for its disposal
17 at the BKK Class I Facility. To date, Defendant Hi-Production Forge Co. has not
18 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
19 incurred by the Plaintiffs at the BKK Class I Facility.

20 383. According to historical BKK Corp. records, Defendant Homexx
21 International Corp., and its successors and/or predecessors, contributed manifested
22 waste to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Homexx International Corp. generated and/or arranged
24 for its disposal at the BKK Class I Facility. To date, Defendant Homexx
25 International Corp. has not incurred any costs at the BKK Class I Facility nor has it
26 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 384. According to historical BKK Corp. records, Defendant Hordis
28 Brothers, and its successors and/or predecessors, contributed manifested waste to

1 the BKK Class I Facility. This manifested waste contained Hazardous Substances
2 that Defendant Hordis Brothers generated and/or arranged for its disposal at the
3 BKK Class I Facility. To date, Defendant Hordis Brothers has not incurred any
4 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
5 the Plaintiffs at the BKK Class I Facility.

6 385. According to historical BKK Corp. records, Defendant Hoya Lens of
7 America Inc., and its successors and/or predecessors, contributed manifested waste
8 to the BKK Class I Facility. This manifested waste contained Hazardous
9 Substances that Defendant Hoya Lens of America Inc. generated and/or arranged
10 for its disposal at the BKK Class I Facility. To date, Defendant Hoya Lens of
11 America Inc. has not incurred any costs at the BKK Class I Facility nor has it paid
12 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

13 386. According to historical BKK Corp. records, Defendant Huffman
14 Manufacturing Co., and its successors and/or predecessors, contributed manifested
15 waste to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Huffman Manufacturing Co. generated and/or arranged
17 for its disposal at the BKK Class I Facility. To date, Defendant Huffman
18 Manufacturing Co. has not incurred any costs at the BKK Class I Facility nor has it
19 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

20 387. According to historical BKK Corp. records, Defendant Huntington
21 Signal Oil Co., and its successors and/or predecessors, contributed manifested
22 waste to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Huntington Signal Oil Co. generated and/or arranged for
24 its disposal at the BKK Class I Facility. To date, Defendant Huntington Signal Oil
25 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
26 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 388. According to historical BKK Corp. records, Defendant Huntington
28 Tile Inc., and its successors and/or predecessors, contributed manifested waste to

1 the BKK Class I Facility. This manifested waste contained Hazardous Substances
2 that Defendant Huntington Tile Inc. generated and/or arranged for its disposal at the
3 BKK Class I Facility. To date, Defendant Huntington Tile Inc. has not incurred any
4 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
5 the Plaintiffs at the BKK Class I Facility.

6 389. According to historical BKK Corp. records, Defendant Huntmix Inc.,
7 and its successors and/or predecessors, contributed manifested waste to the BKK
8 Class I Facility. This manifested waste contained Hazardous Substances that
9 Defendant Huntmix Inc. generated and/or arranged for its disposal at the BKK
10 Class I Facility. To date, Defendant Huntmix Inc. has not incurred any costs at the
11 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
12 at the BKK Class I Facility.

13 390. According to historical BKK Corp. records, Defendant Ibis Systems
14 Inc., and its successors and/or predecessors, contributed manifested waste to the
15 BKK Class I Facility. This manifested waste contained Hazardous Substances that
16 Defendant Ibis Systems Inc. generated and/or arranged for its disposal at the BKK
17 Class I Facility. To date, Defendant Ibis Systems Inc. has not incurred any costs at
18 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
19 Plaintiffs at the BKK Class I Facility.

20 391. According to historical BKK Corp. records, Defendant Ideal Uniform,
21 and its successors and/or predecessors, contributed manifested waste to the BKK
22 Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant Ideal Uniform generated and/or arranged for its disposal at the BKK
24 Class I Facility. To date, Defendant Ideal Uniform has not incurred any costs at the
25 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
26 at the BKK Class I Facility.

27 392. According to historical BKK Corp. records, Defendant Imperial
28 Metals Corp. of America, and its successors and/or predecessors, contributed

1 manifested waste to the BKK Class I Facility. This manifested waste contained
2 Hazardous Substances that Defendant Imperial Metals Corp. of America generated
3 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
4 Imperial Metals Corp. of America has not incurred any costs at the BKK Class I
5 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
6 Class I Facility.

7 393. According to historical BKK Corp. records, Defendant Inca Products
8 Co., and its successors and/or predecessors, contributed manifested waste to the
9 BKK Class I Facility. This manifested waste contained Hazardous Substances that
10 Defendant Inca Products Co. generated and/or arranged for its disposal at the BKK
11 Class I Facility. To date, Defendant Inca Products Co. has not incurred any costs at
12 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
13 Plaintiffs at the BKK Class I Facility.

14 394. According to historical BKK Corp. records, Defendant Inco United
15 States Inc., and its successors and/or predecessors, contributed manifested waste to
16 the BKK Class I Facility. This manifested waste contained Hazardous Substances
17 that Defendant Inco United States Inc. generated and/or arranged for its disposal at
18 the BKK Class I Facility. To date, Defendant Inco United States Inc. has not
19 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
20 incurred by the Plaintiffs at the BKK Class I Facility.

21 395. According to historical BKK Corp. records, Defendant Industrial
22 Asphalt, and its successors and/or predecessors, contributed manifested waste to the
23 BKK Class I Facility. This manifested waste contained Hazardous Substances that
24 Defendant Industrial Asphalt generated and/or arranged for its disposal at the BKK
25 Class I Facility. To date, Defendant Industrial Asphalt has not incurred any costs at
26 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
27 Plaintiffs at the BKK Class I Facility.

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1 396. According to historical BKK Corp. records, Defendant Industrial
2 Insulators & Supply Inc., and its successors and/or predecessors, contributed
3 manifested waste to the BKK Class I Facility. This manifested waste contained
4 Hazardous Substances that Defendant Industrial Insulators & Supply Inc. generated
5 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
6 Industrial Insulators & Supply Inc. has not incurred any costs at the BKK Class I
7 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
8 Class I Facility

9 397. According to historical BKK Corp. records, Defendant Industrial
10 International Corp., and its successors and/or predecessors, contributed manifested
11 waste to the BKK Class I Facility. This manifested waste contained Hazardous
12 Substances that Defendant Industrial International Corp. generated and/or arranged
13 for its disposal at the BKK Class I Facility. To date, Defendant Industrial
14 International Corp. has not incurred any costs at the BKK Class I Facility nor has it
15 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

16 398. According to historical BKK Corp. records, Defendant Industrial
17 Rubber Cement Co. Inc., and its successors and/or predecessors, contributed
18 manifested waste to the BKK Class I Facility. This manifested waste contained
19 Hazardous Substances that Defendant Industrial Rubber Cement Co. Inc. generated
20 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
21 Industrial Rubber Cement Co. Inc. has not incurred any costs at the BKK Class I
22 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
23 Class I Facility.

24 399. According to historical BKK Corp. records, Defendant Industrial
25 Uniform, and its successors and/or predecessors, contributed manifested waste to
26 the BKK Class I Facility. This manifested waste contained Hazardous Substances
27 that Defendant Industrial Uniform generated and/or arranged for its disposal at the
28 BKK Class I Facility. To date, Defendant Industrial Uniform has not incurred any

1 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
2 the Plaintiffs at the BKK Class I Facility.

3 400. According to historical BKK Corp. records, Defendant Industrial
4 Waste Engineering, and its successors and/or predecessors, contributed manifested
5 waste to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant Industrial Waste Engineering generated and/or arranged
7 for its disposal at the BKK Class I Facility. To date, Defendant Industrial Waste
8 Engineering has not incurred any costs at the BKK Class I Facility nor has it paid
9 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 401. According to historical BKK Corp. records, Defendant City of
11 Inglewood contributed both municipal waste and manifested waste to the BKK
12 Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant City of Inglewood generated and/or arranged for its disposal at the BKK
14 Class I Facility. To date, Defendant City of Inglewood has not incurred any costs at
15 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
16 Plaintiffs at the BKK Class I Facility.

17 402. According to historical BKK Corp. records, Defendant Inland
18 Shopping Center, and its successors and/or predecessors, contributed manifested
19 waste to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Defendant Inland Shopping Center generated and/or arranged for
21 its disposal at the BKK Class I Facility. To date, Defendant Inland Shopping Center
22 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
23 of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 403. According to historical BKK Corp. records, Defendant Innovated
25 Electronics, and its successors and/or predecessors, contributed manifested waste to
26 the BKK Class I Facility. This manifested waste contained Hazardous Substances
27 that Defendant Innovated Electronics generated and/or arranged for its disposal at
28 the BKK Class I Facility. To date, Defendant Innovated Electronics has not

1 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
2 incurred by the Plaintiffs at the BKK Class I Facility.

3 404. According to historical BKK Corp. records, Defendant International
4 Decoratives Inc., and its successors and/or predecessors, contributed manifested
5 waste to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant International Decoratives Inc. generated and/or arranged
7 for its disposal at the BKK Class I Facility. To date, Defendant International
8 Decoratives Inc. has not incurred any costs at the BKK Class I Facility nor has it
9 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 405. According to historical BKK Corp. records, Defendant International
11 Extrusion Corp., and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant International Extrusion Corp. generated and/or arranged
14 for its disposal at the BKK Class I Facility. To date, Defendant International
15 Extrusion Corp. has not incurred any costs at the BKK Class I Facility nor has it
16 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

17 406. According to historical BKK Corp. records, Defendant Investment
18 Recovery Services Inc., and its successors and/or predecessors, contributed
19 manifested waste to the BKK Class I Facility. This manifested waste contained
20 Hazardous Substances that Defendant Investment Recovery Services Inc. generated
21 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
22 Investment Recovery Services Inc. has not incurred any costs at the BKK Class I
23 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
24 Class I Facility.

25 407. According to historical BKK Corp. records, Defendant Irvine Ranch
26 Water District, and its successors and/or predecessors, contributed manifested waste
27 to the BKK Class I Facility. This manifested waste contained Hazardous
28 Substances that Defendant Irvine Ranch Water District generated and/or arranged

1 for its disposal at the BKK Class I Facility. To date, Defendant Irvine Ranch Water
2 District has not incurred any costs at the BKK Class I Facility nor has it paid its fair
3 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

4 408. According to historical BKK Corp. records, Defendant Isaac Cohen &
5 Son Metals, and its successors and/or predecessors, contributed manifested waste to
6 the BKK Class I Facility. This manifested waste contained Hazardous Substances
7 that Defendant Isaac Cohen & Son Metals generated and/or arranged for its
8 disposal at the BKK Class I Facility. To date, Defendant Isaac Cohen & Son Metals
9 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
10 of costs incurred by the Plaintiffs at the BKK Class I Facility.

11 409. According to historical BKK Corp. records, Defendant ITT Courier
12 Terminal Systems Inc., and its successors and/or predecessors, contributed
13 manifested waste to the BKK Class I Facility. This manifested waste contained
14 Hazardous Substances that Defendant ITT Courier Terminal Systems Inc. generated
15 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant ITT
16 Courier Terminal Systems Inc. has not incurred any costs at the BKK Class I
17 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
18 Class I Facility.

19 410. According to historical BKK Corp. records, Defendant J. & S. Crome
20 Plating Co. Inc., and its successors and/or predecessors, contributed manifested
21 waste to the BKK Class I Facility. This manifested waste contained Hazardous
22 Substances that Defendant J. & S. Crome Plating Co. Inc. generated and/or
23 arranged for its disposal at the BKK Class I Facility. To date, Defendant J. & S.
24 Crome Plating Co. Inc. has not incurred any costs at the BKK Class I Facility nor
25 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
26 Facility.

27 411. According to historical BKK Corp. records, Defendant J. & S.
28 Laboratories Inc., and its successors and/or predecessors, contributed manifested

1 waste to the BKK Class I Facility. This manifested waste contained Hazardous
2 Substances that Defendant J. & S. Laboratories Inc. generated and/or arranged for
3 its disposal at the BKK Class I Facility. To date, Defendant J. & S. Laboratories
4 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
5 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

6 412. According to historical BKK Corp. records, Defendant J. H. Baxter,
7 and its successors and/or predecessors, contributed manifested waste to the BKK
8 Class I Facility. This manifested waste contained Hazardous Substances that
9 Defendant J. H. Baxter generated and/or arranged for its disposal at the BKK Class
10 I Facility. To date, Defendant J. H. Baxter has not incurred any costs at the BKK
11 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
12 BKK Class I Facility.

13 413. According to historical BKK Corp. records, Defendant J. L. Jones &
14 Co., and its successors and/or predecessors, contributed manifested waste to the
15 BKK Class I Facility. This manifested waste contained Hazardous Substances that
16 Defendant J. L. Jones & Co. generated and/or arranged for its disposal at the BKK
17 Class I Facility. To date, Defendant J. L. Jones & Co. has not incurred any costs at
18 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
19 Plaintiffs at the BKK Class I Facility.

20 414. According to historical BKK Corp. records, Defendant J. W. Carrol &
21 Sons, and its successors and/or predecessors, contributed manifested waste to the
22 BKK Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant J. W. Carrol & Sons generated and/or arranged for its disposal at the
24 BKK Class I Facility. To date, Defendant J. W. Carrol & Sons has not incurred any
25 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
26 the Plaintiffs at the BKK Class I Facility.

27 415. According to historical BKK Corp. records, Defendant Jacat Oil Co.,
28 and its successors and/or predecessors, contributed manifested waste to the BKK

1 Class I Facility. This manifested waste contained Hazardous Substances that
2 Defendant Jacat Oil Co. generated and/or arranged for its disposal at the BKK Class
3 I Facility. To date, Defendant Jacat Oil Co. has not incurred any costs at the BKK
4 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
5 BKK Class I Facility.

6 416. Upon information and belief, Defendant Jack B Kelley LLC is the
7 successor to Defendant W. S. Hatch Co. and/or otherwise liable for manifested
8 waste that was contributed to the BKK Class I Facility by W. S. Hatch Co.
9 According to historical BKK Corp. records, Defendant Pichel Industries Inc.
10 contributed manifested waste to the BKK Class I Facility. This manifested waste
11 contained Hazardous Substances that Defendant W. S. Hatch Co. generated and/or
12 arranged for its disposal at the BKK Class I Facility. To date, Defendant Jack B
13 Kelley LLC has not incurred any costs at the BKK Class I Facility nor has it paid
14 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 417. According to historical BKK Corp. records, Defendant Jack Cline, and
16 its successors and/or predecessors, contributed manifested waste to the BKK Class I
17 Facility. This manifested waste contained Hazardous Substances that Defendant
18 Jack Cline generated and/or arranged for its disposal at the BKK Class I Facility.
19 To date, Defendant Jack Cline has not incurred any costs at the BKK Class I
20 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
21 Class I Facility.

22 418. According to historical BKK Corp. records, Defendant Jay Die
23 Casting, and its successors and/or predecessors, contributed manifested waste to the
24 BKK Class I Facility. This manifested waste contained Hazardous Substances that
25 Defendant Jay Die Casting generated and/or arranged for its disposal at the BKK
26 Class I Facility. To date, Defendant Jay Die Casting has not incurred any costs at
27 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
28 Plaintiffs at the BKK Class I Facility.

1 419. According to historical BKK Corp. records, Defendant Jaybee
2 Manufacturing Corp., and its successors and/or predecessors, contributed
3 manifested waste to the BKK Class I Facility. This manifested waste contained
4 Hazardous Substances that Defendant Jaybee Manufacturing Corp. generated
5 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
6 Jaybee Manufacturing Corp. has not incurred any costs at the BKK Class I Facility
7 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
8 Facility.

9 420. According to historical BKK Corp. records, Defendant Jenkins Oil Co.
10 Inc., and its successors and/or predecessors, contributed manifested waste to the
11 BKK Class I Facility. This manifested waste contained Hazardous Substances that
12 Defendant Jenkins Oil Co. Inc. generated and/or arranged for its disposal at the
13 BKK Class I Facility. To date, Defendant Jenkins Oil Co. Inc. has not incurred any
14 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
15 the Plaintiffs at the BKK Class I Facility.

16 421. According to historical BKK Corp. records, Defendant Jennings
17 Plating Co. Inc., and its successors and/or predecessors, contributed manifested
18 waste to the BKK Class I Facility. This manifested waste contained Hazardous
19 Substances that Defendant Jennings Plating Co. Inc. generated and/or arranged for
20 its disposal at the BKK Class I Facility. To date, Defendant Jennings Plating Co.
21 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
22 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 422. According to historical BKK Corp. records, Defendant Jerrald
24 Properties, and its successors and/or predecessors, contributed manifested waste to
25 the BKK Class I Facility. This manifested waste contained Hazardous Substances
26 that Defendant Jerrald Properties generated and/or arranged for its disposal at the
27 BKK Class I Facility. To date, Defendant Jerrald Properties has not incurred any
28

1 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
2 the Plaintiffs at the BKK Class I Facility.

3 423. According to historical BKK Corp. records, Defendant Jerry Goodwill,
4 and its successors and/or predecessors, contributed manifested waste to the BKK
5 Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Jerry Goodwill generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant Jerry Goodwill has not incurred any costs at the
8 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
9 at the BKK Class I Facility.

10 424. According to historical BKK Corp. records, Defendant Jetronic
11 Industries Inc., and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant Jetronic Industries Inc. generated and/or arranged for its
14 disposal at the BKK Class I Facility. To date, Defendant Jetronic Industries Inc. has
15 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
16 costs incurred by the Plaintiffs at the BKK Class I Facility.

17 425. According to historical BKK Corp. records, Defendant JMB Property
18 Management, and its successors and/or predecessors, contributed manifested waste
19 to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Defendant JMB Property Management generated and/or arranged
21 for its disposal at the BKK Class I Facility. To date, Defendant JMB Property
22 Management has not incurred any costs at the BKK Class I Facility nor has it paid
23 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 426. According to historical BKK Corp. records, Defendant John D. Lusk
25 & Sons, and its successors and/or predecessors, contributed manifested waste to the
26 BKK Class I Facility. This manifested waste contained Hazardous Substances that
27 Defendant John D. Lusk & Sons generated and/or arranged for its disposal at the
28 BKK Class I Facility. To date, Defendant John D. Lusk & Sons has not incurred

1 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
2 by the Plaintiffs at the BKK Class I Facility.

3 427. According to historical BKK Corp. records, Defendant Jorco Inc., and
4 its successors and/or predecessors, contributed manifested waste to the BKK Class I
5 Facility. This manifested waste contained Hazardous Substances that Defendant
6 Jorco Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To
7 date, Defendant Jorco Inc. has not incurred any costs at the BKK Class I Facility
8 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
9 Facility.

10 428. According to historical BKK Corp. records, Defendant K. L. Redfern
11 Construction Co., and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant K. L. Redfern Construction Co. generated and/or
14 arranged for its disposal at the BKK Class I Facility. To date, Defendant K. L.
15 Redfern Construction Co. has not incurred any costs at the BKK Class I Facility nor
16 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
17 Facility.

18 429. According to historical BKK Corp. records, Defendant Kaiser Pipes &
19 Casing, and its successors and/or predecessors, contributed manifested waste to the
20 BKK Class I Facility. This manifested waste contained Hazardous Substances that
21 Defendant Kaiser Pipes & Casing generated and/or arranged for its disposal at the
22 BKK Class I Facility. To date, Defendant Kaiser Pipes & Casing has not incurred
23 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
24 by the Plaintiffs at the BKK Class I Facility.

25 430. Upon information and belief, Defendant Kag Merchant Gas Group is
26 the successor to Defendant W. S. Hatch Co. and/or otherwise liable for manifested
27 waste that was contributed to the BKK Class I Facility by W. S. Hatch Co.
28 According to historical BKK Corp. records, Defendant Pichel Industries Inc.

1 contributed manifested waste to the BKK Class I Facility. This manifested waste
2 contained Hazardous Substances that Defendant W. S. Hatch Co. generated and/or
3 arranged for its disposal at the BKK Class I Facility. To date, Defendant Kag
4 Merchant Gas Group has not incurred any costs at the BKK Class I Facility nor has
5 it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

6 431. According to historical BKK Corp. records, Defendant Kay Brunner,
7 and its successors and/or predecessors, contributed manifested waste to the BKK
8 Class I Facility. This manifested waste contained Hazardous Substances that
9 Defendant Kay Brunner generated and/or arranged for its disposal at the BKK Class
10 I Facility. To date, Defendant Kay Brunner has not incurred any costs at the BKK
11 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
12 BKK Class I Facility.

13 432. According to historical BKK Corp. records, Defendant Keeco, and its
14 successors and/or predecessors, contributed manifested waste to the BKK Class I
15 Facility. This manifested waste contained Hazardous Substances that Defendant
16 Keeco generated and/or arranged for its disposal at the BKK Class I Facility. To
17 date, Defendant Keeco has not incurred any costs at the BKK Class I Facility nor
18 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
19 Facility.

20 433. According to historical BKK Corp. records, Defendant Keller Street
21 Development Co., and its successors and/or predecessors, contributed manifested
22 waste to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Keller Street Development Co. generated and/or
24 arranged for its disposal at the BKK Class I Facility. To date, Defendant Keller
25 Street Development Co. has not incurred any costs at the BKK Class I Facility nor
26 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
27 Facility.

28

1 434. According to historical BKK Corp. records, Defendant Kelley
2 Manufacturing Co., and its successors and/or predecessors, contributed manifested
3 waste to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant Kelley Manufacturing Co. generated and/or arranged for
5 its disposal at the BKK Class I Facility. To date, Defendant Kelley Manufacturing
6 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
7 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

8 435. According to historical BKK Corp. records, Defendant Kellogg & Son
9 Drilling Co., and its successors and/or predecessors, contributed manifested waste
10 to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant Kellogg & Son Drilling Co. generated and/or arranged
12 for its disposal at the BKK Class I Facility. To date, Defendant Kellogg & Son
13 Drilling Co. has not incurred any costs at the BKK Class I Facility nor has it paid
14 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 436. According to historical BKK Corp. records, Defendant Ken-Air Inc.,
16 and its successors and/or predecessors, contributed manifested waste to the BKK
17 Class I Facility. This manifested waste contained Hazardous Substances that
18 Defendant Ken-Air Inc. generated and/or arranged for its disposal at the BKK Class
19 I Facility. To date, Defendant Ken-Air Inc. has not incurred any costs at the BKK
20 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
21 BKK Class I Facility.

22 437. According to historical BKK Corp. records, Defendant Kenetex
23 Chemicals, and its successors and/or predecessors, contributed manifested waste to
24 the BKK Class I Facility. This manifested waste contained Hazardous Substances
25 that Defendant Kenetex Chemicals generated and/or arranged for its disposal at the
26 BKK Class I Facility. To date, Defendant Kenetex Chemicals has not incurred any
27 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
28 the Plaintiffs at the BKK Class I Facility.

1 438. According to historical BKK Corp. records, Defendant Kern Foods
2 Inc., and its successors and/or predecessors, contributed manifested waste to the
3 BKK Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant Kern Foods Inc. generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant Kern Foods Inc. has not incurred any costs at
6 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
7 Plaintiffs at the BKK Class I Facility.

8 439. According to historical BKK Corp. records, Defendant Ketema
9 Aluminum Extrusion, and its successors and/or predecessors, contributed
10 manifested waste to the BKK Class I Facility. This manifested waste contained
11 Hazardous Substances that Defendant Ketema Aluminum Extrusion generated
12 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
13 Ketema Aluminum Extrusion has not incurred any costs at the BKK Class I Facility
14 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
15 Facility.

16 440. According to historical BKK Corp. records, Defendant Keystone
17 Products Inc., and its successors and/or predecessors, contributed manifested waste
18 to the BKK Class I Facility. This manifested waste contained Hazardous
19 Substances that Defendant Keystone Products Inc. generated and/or arranged for its
20 disposal at the BKK Class I Facility. To date, Defendant Keystone Products Inc.
21 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
22 of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 441. According to historical BKK Corp. records, Defendant Kimco
24 Manufacturing Inc., and its successors and/or predecessors, contributed manifested
25 waste to the BKK Class I Facility. This manifested waste contained Hazardous
26 Substances that Defendant Kimco Manufacturing Inc. generated and/or arranged for
27 its disposal at the BKK Class I Facility. To date, Defendant Kimco Manufacturing
28

1 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
2 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 442. According to historical BKK Corp. records, Defendant Kinsbursky
4 Brothers Supply Inc., and its successors and/or predecessors, contributed
5 manifested waste to the BKK Class I Facility. This manifested waste contained
6 Hazardous Substances that Defendant Kinsbursky Brothers Supply Inc. generated
7 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
8 Kinsbursky Brothers Supply Inc. has not incurred any costs at the BKK Class I
9 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
10 Class I Facility.

11 443. According to historical BKK Corp. records, Defendant Kirkhill Inc.,
12 and its successors and/or predecessors, contributed manifested waste to the BKK
13 Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant Kirkhill Inc. generated and/or arranged for its disposal at the BKK Class
15 I Facility. To date, Defendant Kirkhill Inc. has not incurred any costs at the BKK
16 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
17 BKK Class I Facility.

18 444. According to historical BKK Corp. records, Defendant Kler Pak, and
19 its successors and/or predecessors, contributed manifested waste to the BKK Class I
20 Facility. This manifested waste contained Hazardous Substances that Defendant
21 Kler Pak generated and/or arranged for its disposal at the BKK Class I Facility. To
22 date, Defendant Kler Pak has not incurred any costs at the BKK Class I Facility
23 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
24 Facility.

25 445. According to historical BKK Corp. records, Defendant KLM Oil Co.,
26 and its successors and/or predecessors, contributed manifested waste to the BKK
27 Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant KLM Oil Co. generated and/or arranged for its disposal at the BKK

1 Class I Facility. To date, Defendant KLM Oil Co. has not incurred any costs at the
2 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
3 at the BKK Class I Facility.

4 446. According to historical BKK Corp. records, Defendant Knape & Vogt
5 Manufacturing, and its successors and/or predecessors, contributed manifested
6 waste to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Knape & Vogt Manufacturing generated and/or arranged
8 for its disposal at the BKK Class I Facility. To date, Defendant Knape & Vogt
9 Manufacturing has not incurred any costs at the BKK Class I Facility nor has it paid
10 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

11 447. According to historical BKK Corp. records, Defendant Koboway, and
12 its successors and/or predecessors, contributed manifested waste to the BKK Class I
13 Facility. This manifested waste contained Hazardous Substances that Defendant
14 Koboway generated and/or arranged for its disposal at the BKK Class I Facility. To
15 date, Defendant Koboway has not incurred any costs at the BKK Class I Facility
16 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
17 Facility.

18 448. According to historical BKK Corp. records, Defendant Koch Asphalt
19 Co. Oil, and its successors and/or predecessors, contributed manifested waste to the
20 BKK Class I Facility. This manifested waste contained Hazardous Substances that
21 Defendant Koch Asphalt Co. Oil generated and/or arranged for its disposal at the
22 BKK Class I Facility. To date, Defendant Koch Asphalt Co. Oil has not incurred
23 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
24 by the Plaintiffs at the BKK Class I Facility.

25 449. According to historical BKK Corp. records, Defendant Korody Colyer
26 Corp., and its successors and/or predecessors, contributed manifested waste to the
27 BKK Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Korody Colyer Corp. generated and/or arranged for its disposal at the

1 BKK Class I Facility. To date, Defendant Korody Colyer Corp. has not incurred
2 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
3 by the Plaintiffs at the BKK Class I Facility.

4 450. According to historical BKK Corp. records, Defendant Kulberg
5 Development Corp., and its successors and/or predecessors, contributed manifested
6 waste to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Kulberg Development Corp. generated and/or arranged
8 for its disposal at the BKK Class I Facility. To date, Defendant Kulberg
9 Development Corp. has not incurred any costs at the BKK Class I Facility nor has it
10 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

11 451. According to historical BKK Corp. records, Defendant L. & L. Tank
12 Lines Inc., and its successors and/or predecessors, contributed manifested waste to
13 the BKK Class I Facility. This manifested waste contained Hazardous Substances
14 that Defendant L. & L. Tank Lines Inc. generated and/or arranged for its disposal at
15 the BKK Class I Facility. To date, Defendant L. & L. Tank Lines Inc. has not
16 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
17 incurred by the Plaintiffs at the BKK Class I Facility.

18 452. According to historical BKK Corp. records, Defendant La Fon
19 Equipment Co., and its successors and/or predecessors, contributed manifested
20 waste to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Defendant La Fon Equipment Co. generated and/or arranged for its
22 disposal at the BKK Class I Facility. To date, Defendant La Fon Equipment Co. has
23 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
24 costs incurred by the Plaintiffs at the BKK Class I Facility.

25 453. According to historical BKK Corp. records, Defendant La Victoria
26 Foods, and its successors and/or predecessors, contributed manifested waste to the
27 BKK Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant La Victoria Foods generated and/or arranged for its disposal at the BKK

1 Class I Facility. To date, Defendant La Victoria Foods has not incurred any costs at
2 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
3 Plaintiffs at the BKK Class I Facility.

4 454. According to historical BKK Corp. records, Defendant Lubricating
5 Specialties, and its successors and/or predecessors, contributed manifested waste to
6 the BKK Class I Facility. This manifested waste contained Hazardous Substances
7 that Defendant Lubricating Specialties generated and/or arranged for its disposal at
8 the BKK Class I Facility. To date, Defendant Lubricating Specialties has not
9 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
10 incurred by the Plaintiffs at the BKK Class I Facility.

11 455. According to historical BKK Corp. records, Defendant Lackawanna
12 Leather, and its successors and/or predecessors, contributed manifested waste to the
13 BKK Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant Lackawanna Leather generated and/or arranged for its disposal at the
15 BKK Class I Facility. To date, Defendant Lackawanna Leather has not incurred any
16 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
17 the Plaintiffs at the BKK Class I Facility.

18 456. According to historical BKK Corp. records, Defendant Lakewood Oil
19 Service Inc., and its successors and/or predecessors, contributed manifested waste
20 to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Defendant Lakewood Oil Service Inc. generated and/or arranged
22 for its disposal at the BKK Class I Facility. To date, Defendant Lakewood Oil
23 Service Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its
24 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

25 457. According to historical BKK Corp. records, Defendant Lamin Arts,
26 and its successors and/or predecessors, contributed manifested waste to the BKK
27 Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Lamin Arts generated and/or arranged for its disposal at the BKK Class I

1 Facility. To date, Defendant Lamin Arts has not incurred any costs at the BKK
2 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
3 BKK Class I Facility.

4 458. According to historical BKK Corp. records, Defendant Lamination
5 Technology Inc., and its successors and/or predecessors, contributed manifested
6 waste to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Lamination Technology Inc. generated and/or arranged
8 for its disposal at the BKK Class I Facility. To date, Defendant Lamination
9 Technology Inc. has not incurred any costs at the BKK Class I Facility nor has it
10 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

11 459. According to historical BKK Corp. records, Defendant Langlois Flour
12 Co., and its successors and/or predecessors, contributed manifested waste to the
13 BKK Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant Langlois Flour Co. generated and/or arranged for its disposal at the BKK
15 Class I Facility. To date, Defendant Langlois Flour Co. has not incurred any costs
16 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
17 Plaintiffs at the BKK Class I Facility.

18 460. According to historical BKK Corp. records, Defendant Larry Fricker
19 Co. Inc., and its successors and/or predecessors, contributed manifested waste to the
20 BKK Class I Facility. This manifested waste contained Hazardous Substances that
21 Defendant Larry Fricker Co. Inc. generated and/or arranged for its disposal at the
22 BKK Class I Facility. To date, Defendant Larry Fricker Co. Inc. has not incurred
23 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
24 by the Plaintiffs at the BKK Class I Facility.

25 461. According to historical BKK Corp. records, Defendant Latchford
26 Glass Co., and its successors and/or predecessors, contributed manifested waste to
27 the BKK Class I Facility. This manifested waste contained Hazardous Substances
28 that Defendant Latchford Glass Co. generated and/or arranged for its disposal at the

1 BKK Class I Facility. To date, Defendant Latchford Glass Co. has not incurred any
2 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
3 the Plaintiffs at the BKK Class I Facility.

4 462. According to historical BKK Corp. records, Defendant Le Fiell
5 Manufacturing Co., and its successors and/or predecessors, contributed manifested
6 waste to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Le Fiell Manufacturing Co. generated and/or arranged
8 for its disposal at the BKK Class I Facility. To date, Defendant Le Fiell
9 Manufacturing Co. has not incurred any costs at the BKK Class I Facility nor has it
10 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

11 463. According to historical BKK Corp. records, Defendant Leach Corp.,
12 and its successors and/or predecessors, contributed manifested waste to the BKK
13 Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant Leach Corp. generated and/or arranged for its disposal at the BKK Class
15 I Facility. To date, Defendant Leach Corp. has not incurred any costs at the BKK
16 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
17 BKK Class I Facility.

18 464. According to historical BKK Corp. records, Defendant Lear Siegler
19 Inc., and its successors and/or predecessors, contributed manifested waste to the
20 BKK Class I Facility. This manifested waste contained Hazardous Substances that
21 Defendant Lear Siegler Inc. generated and/or arranged for its disposal at the BKK
22 Class I Facility. To date, Defendant Lear Siegler Inc. has not incurred any costs at
23 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
24 Plaintiffs at the BKK Class I Facility.

25 465. According to historical BKK Corp. records, Defendant Lee
26 Pharmaceuticals Bronco Enterprises, and its successors and/or predecessors,
27 contributed manifested waste to the BKK Class I Facility. This manifested waste
28 contained Hazardous Substances that Defendant Lee Pharmaceuticals Bronco

1 Enterprises generated and/or arranged for its disposal at the BKK Class I Facility.
2 To date, Defendant Lee Pharmaceuticals Bronco Enterprises has not incurred any
3 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
4 the Plaintiffs at the BKK Class I Facility.

5 466. According to historical BKK Corp. records, Defendant Lewis Foods,
6 and its successors and/or predecessors, contributed manifested waste to the BKK
7 Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Lewis Foods generated and/or arranged for its disposal at the BKK Class
9 I Facility. To date, Defendant Lewis Foods has not incurred any costs at the BKK
10 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
11 BKK Class I Facility.

12 467. According to historical BKK Corp. records, Defendant Life Paint
13 Corp., and its successors and/or predecessors, contributed manifested waste to the
14 BKK Class I Facility. This manifested waste contained Hazardous Substances that
15 Defendant Life Paint Corp. generated and/or arranged for its disposal at the BKK
16 Class I Facility. To date, Defendant Life Paint Corp. has not incurred any costs at
17 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
18 Plaintiffs at the BKK Class I Facility.

19 468. According to historical BKK Corp. records, Defendant Lockhart
20 Industries, and its successors and/or predecessors, contributed manifested waste to
21 the BKK Class I Facility. This manifested waste contained Hazardous Substances
22 that Defendant Lockhart Industries generated and/or arranged for its disposal at the
23 BKK Class I Facility. To date, Defendant Lockhart Industries has not incurred any
24 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
25 the Plaintiffs at the BKK Class I Facility.

26 469. According to historical BKK Corp. records, Defendant Long & Co.,
27 and its successors and/or predecessors, contributed manifested waste to the BKK
28 Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant Long & Co. generated and/or arranged for its disposal at the BKK Class
2 I Facility. To date, Defendant Long & Co. has not incurred any costs at the BKK
3 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
4 BKK Class I Facility.

5 470. According to historical BKK Corp. records, Defendant Long Beach
6 Oil Development Co., and its successors and/or predecessors, contributed
7 manifested waste to the BKK Class I Facility. This manifested waste contained
8 Hazardous Substances that Defendant Long Beach Oil Development Co. generated
9 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
10 Long Beach Oil Development Co. has not incurred any costs at the BKK Class I
11 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
12 Class I Facility.

13 471. According to historical BKK Corp. records, Defendant Long Beach
14 Plating Co., and its successors and/or predecessors, contributed manifested waste to
15 the BKK Class I Facility. This manifested waste contained Hazardous Substances
16 that Defendant Long Beach Plating Co. generated and/or arranged for its disposal at
17 the BKK Class I Facility. To date, Defendant Long Beach Plating Co. has not
18 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
19 incurred by the Plaintiffs at the BKK Class I Facility.

20 472. According to historical BKK Corp. records, Defendant Los Angeles
21 Community College District, and its successors and/or predecessors, contributed
22 manifested waste to the BKK Class I Facility. This manifested waste contained
23 Hazardous Substances that Defendant Los Angeles Community College District
24 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
25 Defendant Los Angeles Community College District has not incurred any costs at
26 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
27 Plaintiffs at the BKK Class I Facility.

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1 473. According to historical BKK Corp. records, Defendant Los Angeles
2 Screw Products Inc., and its successors and/or predecessors, contributed manifested
3 waste to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant Los Angeles Screw Products Inc. generated and/or
5 arranged for its disposal at the BKK Class I Facility. To date, Defendant Los
6 Angeles Screw Products Inc. has not incurred any costs at the BKK Class I Facility
7 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
8 Facility.

9 474. According to historical BKK Corp. records, Defendant Los Angeles
10 Tanning Co., and its successors and/or predecessors, contributed manifested waste
11 to the BKK Class I Facility. This manifested waste contained Hazardous
12 Substances that Defendant Los Angeles Tanning Co. generated and/or arranged for
13 its disposal at the BKK Class I Facility. To date, Defendant Los Angeles Tanning
14 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
15 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

16 475. According to historical BKK Corp. records, Defendant Lubrication Co.
17 of America, and its successors and/or predecessors, contributed manifested waste to
18 the BKK Class I Facility. This manifested waste contained Hazardous Substances
19 that Defendant Lubrication Co. of America generated and/or arranged for its
20 disposal at the BKK Class I Facility. To date, Defendant Lubrication Co. of
21 America has not incurred any costs at the BKK Class I Facility nor has it paid its
22 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 476. Upon information and belief, Defendant Lundeen Inc. is the successor
24 to Defendant Lundeen Rail Car Repair Service and/or otherwise liable for
25 manifested waste that was contributed to the BKK Class I Facility by Lundeen Rail
26 Car Repair Service. According to historical BKK Corp. records, Defendant
27 Lundeen Rail Car Repair Service contributed manifested waste to the BKK Class I
28 Facility. This manifested waste contained Hazardous Substances that Defendant

1 Lundeen Rail Car Repair Service generated and/or arranged for its disposal at the
2 BKK Class I Facility. To date, Defendant Lundeen Inc. has not incurred any costs
3 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
4 Plaintiffs at the BKK Class I Facility.

5 477. According to historical BKK Corp. records, Defendant Lundeen Rail
6 Car Repair Service, and its successors and/or predecessors, contributed manifested
7 waste to the BKK Class I Facility. This manifested waste contained Hazardous
8 Substances that Defendant Lundeen Rail Car Repair Service generated and/or
9 arranged for its disposal at the BKK Class I Facility. To date, Defendant Lundeen
10 Rail Car Repair Service has not incurred any costs at the BKK Class I Facility nor
11 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
12 Facility.

13 478. According to historical BKK Corp. records, Defendant Lyco Food
14 Products, and its successors and/or predecessors, contributed manifested waste to
15 the BKK Class I Facility. This manifested waste contained Hazardous Substances
16 that Defendant Lyco Food Products generated and/or arranged for its disposal at the
17 BKK Class I Facility. To date, Defendant Lyco Food Products has not incurred any
18 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
19 the Plaintiffs at the BKK Class I Facility.

20 479. According to historical BKK Corp. records, Defendant Lyle Van
21 Patten Co. Inc., and its successors and/or predecessors, contributed manifested
22 waste to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Lyle Van Patten Co. Inc. generated and/or arranged for
24 its disposal at the BKK Class I Facility. To date, Defendant Lyle Van Patten Co.
25 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
26 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 480. According to historical BKK Corp. records, Defendant M. P.
28 McCaffrey Inc., and its successors and/or predecessors, contributed manifested

1 waste to the BKK Class I Facility. This manifested waste contained Hazardous
2 Substances that Defendant M. P. McCaffrey Inc. generated and/or arranged for its
3 disposal at the BKK Class I Facility. To date, Defendant M. P. McCaffrey Inc. has
4 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
5 costs incurred by the Plaintiffs at the BKK Class I Facility.

6 481. According to historical BKK Corp. records, Defendant M. Slayen &
7 Associates, and its successors and/or predecessors, contributed manifested waste to
8 the BKK Class I Facility. This manifested waste contained Hazardous Substances
9 that Defendant M. Slayen & Associates generated and/or arranged for its disposal at
10 the BKK Class I Facility. To date, Defendant M. Slayen & Associates has not
11 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
12 incurred by the Plaintiffs at the BKK Class I Facility.

13 482. According to historical BKK Corp. records, Defendant M. V. Japan
14 Canela, and its successors and/or predecessors, contributed manifested waste to the
15 BKK Class I Facility. This manifested waste contained Hazardous Substances that
16 Defendant M. V. Japan Canela generated and/or arranged for its disposal at the
17 BKK Class I Facility. To date, Defendant M. V. Japan Canela has not incurred any
18 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
19 the Plaintiffs at the BKK Class I Facility.

20 483. According to historical BKK Corp. records, Defendant Macmillan Oil
21 Co., and its successors and/or predecessors, contributed manifested waste to the
22 BKK Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant Macmillan Oil Co. generated and/or arranged for its disposal at the BKK
24 Class I Facility. To date, Defendant Macmillan Oil Co. has not incurred any costs at
25 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
26 Plaintiffs at the BKK Class I Facility.

27 484. According to historical BKK Corp. records, Defendant Magna Mill
28 Prod., and its successors and/or predecessors, contributed manifested waste to the

1 BKK Class I Facility. This manifested waste contained Hazardous Substances that
2 Defendant Magna Mill Prod. generated and/or arranged for its disposal at the BKK
3 Class I Facility. To date, Defendant Magna Mill Prod. has not incurred any costs at
4 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
5 Plaintiffs at the BKK Class I Facility.

6 485. According to historical BKK Corp. records, Defendant Maness
7 Excavating, and its successors and/or predecessors, contributed manifested waste to
8 the BKK Class I Facility. This manifested waste contained Hazardous Substances
9 that Defendant Maness Excavating generated and/or arranged for its disposal at the
10 BKK Class I Facility. To date, Defendant Maness Excavating has not incurred any
11 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
12 the Plaintiffs at the BKK Class I Facility.

13 486. According to historical BKK Corp. records, Defendant Marbeth
14 Chemical Co., and its successors and/or predecessors, contributed manifested waste
15 to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Marbeth Chemical Co. generated and/or arranged for its
17 disposal at the BKK Class I Facility. To date, Defendant Marbeth Chemical Co. has
18 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
19 costs incurred by the Plaintiffs at the BKK Class I Facility.

20 487. According to historical BKK Corp. records, Defendant Marcrest
21 Pacific Co. Inc., and its successors and/or predecessors, contributed manifested
22 waste to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Marcrest Pacific Co. Inc. generated and/or arranged for
24 its disposal at the BKK Class I Facility. To date, Defendant Marcrest Pacific Co.
25 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
26 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 488. According to historical BKK Corp. records, Defendant Marina
28 Pacifica, and its successors and/or predecessors, contributed manifested waste to

1 the BKK Class I Facility. This manifested waste contained Hazardous Substances
2 that Defendant Marina Pacifica generated and/or arranged for its disposal at the
3 BKK Class I Facility. To date, Defendant Marina Pacifica has not incurred any
4 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
5 the Plaintiffs at the BKK Class I Facility.

6 489. According to historical BKK Corp. records, Defendant Mark
7 Industries, and its successors and/or predecessors, contributed manifested waste to
8 the BKK Class I Facility. This manifested waste contained Hazardous Substances
9 that Defendant Mark Industries generated and/or arranged for its disposal at the
10 BKK Class I Facility. To date, Defendant Mark Industries has not incurred any
11 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
12 the Plaintiffs at the BKK Class I Facility.

13 490. According to historical BKK Corp. records, Defendant Marlex Oil &
14 Refining Inc., and its successors and/or predecessors, contributed manifested waste
15 to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Marlex Oil & Refining Inc. generated and/or arranged
17 for its disposal at the BKK Class I Facility. To date, Defendant Marlex Oil &
18 Refining Inc. has not incurred any costs at the BKK Class I Facility nor has it paid
19 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

20 491. According to historical BKK Corp. records, Defendant Marmac
21 Resource Co., and its successors and/or predecessors, contributed manifested waste
22 to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Marmac Resource Co. generated and/or arranged for its
24 disposal at the BKK Class I Facility. To date, Defendant Marmac Resource Co. has
25 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
26 costs incurred by the Plaintiffs at the BKK Class I Facility.

27 492. According to historical BKK Corp. records, Defendant Marquadt Co.,
28 and its successors and/or predecessors, contributed manifested waste to the BKK

1 Class I Facility. This manifested waste contained Hazardous Substances that
2 Defendant Marquadt Co. generated and/or arranged for its disposal at the BKK
3 Class I Facility. To date, Defendant Marquadt Co. has not incurred any costs at the
4 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
5 at the BKK Class I Facility.

6 493. According to historical BKK Corp. records, Defendant Marquis
7 Industries, and its successors and/or predecessors, contributed manifested waste to
8 the BKK Class I Facility. This manifested waste contained Hazardous Substances
9 that Defendant Marquis Industries generated and/or arranged for its disposal at the
10 BKK Class I Facility. To date, Defendant Marquis Industries has not incurred any
11 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
12 the Plaintiffs at the BKK Class I Facility.

13 494. According to historical BKK Corp. records, Defendant Master Fence
14 Fittings, and its successors and/or predecessors, contributed manifested waste to the
15 BKK Class I Facility. This manifested waste contained Hazardous Substances that
16 Defendant Master Fence Fittings generated and/or arranged for its disposal at the
17 BKK Class I Facility. To date, Defendant Master Fence Fittings has not incurred
18 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
19 by the Plaintiffs at the BKK Class I Facility.

20 495. According to historical BKK Corp. records, Defendant Master
21 Products Manufacturing Co., and its successors and/or predecessors, contributed
22 manifested waste to the BKK Class I Facility. This manifested waste contained
23 Hazardous Substances that Defendant Master Products Manufacturing Co.
24 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
25 Defendant Master Products Manufacturing Co. has not incurred any costs at the
26 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
27 at the BKK Class I Facility.

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1 496. According to historical BKK Corp. records, Defendant Mayon Foods,
2 and its successors and/or predecessors, contributed manifested waste to the BKK
3 Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant Mayon Foods generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant Mayon Foods has not incurred any costs at the
6 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
7 at the BKK Class I Facility.

8 497. According to historical BKK Corp. records, Defendant McAlmond Oil
9 & Gas, and its successors and/or predecessors, contributed manifested waste to the
10 BKK Class I Facility. This manifested waste contained Hazardous Substances that
11 Defendant McAlmond Oil & Gas generated and/or arranged for its disposal at the
12 BKK Class I Facility. To date, Defendant McAlmond Oil & Gas has not incurred
13 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
14 by the Plaintiffs at the BKK Class I Facility.

15 498. According to historical BKK Corp. records, Defendant McAuley Oil
16 Co., and its successors and/or predecessors, contributed manifested waste to the
17 BKK Class I Facility. This manifested waste contained Hazardous Substances that
18 Defendant McAuley Oil Co. generated and/or arranged for its disposal at the BKK
19 Class I Facility. To date, Defendant McAuley Oil Co. has not incurred any costs at
20 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
21 Plaintiffs at the BKK Class I Facility

22 499. According to historical BKK Corp. records, Defendant McCulloch
23 Corp., and its successors and/or predecessors, contributed manifested waste to the
24 BKK Class I Facility. This manifested waste contained Hazardous Substances that
25 Defendant McCulloch Corp. generated and/or arranged for its disposal at the BKK
26 Class I Facility. To date, Defendant McCulloch Corp. has not incurred any costs at
27 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
28 Plaintiffs at the BKK Class I Facility.

1 500. According to historical BKK Corp. records, Defendant McCurdy
2 Circuits, and its successors and/or predecessors, contributed manifested waste to the
3 BKK Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant McCurdy Circuits generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant McCurdy Circuits has not incurred any costs at
6 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
7 Plaintiffs at the BKK Class I Facility.

8 501. According to historical BKK Corp. records, Defendant McMahan
9 Development, and its successors and/or predecessors, contributed manifested waste
10 to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant McMahan Development generated and/or arranged for
12 its disposal at the BKK Class I Facility. To date, Defendant McMahan
13 Development has not incurred any costs at the BKK Class I Facility nor has it paid
14 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 502. According to historical BKK Corp. records, Defendant McNottingham
16 Co. of Southern California, and its successors and/or predecessors, contributed
17 manifested waste to the BKK Class I Facility. This manifested waste contained
18 Hazardous Substances that Defendant McNottingham Co. of Southern California
19 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
20 Defendant McNottingham Co. of Southern California has not incurred any costs at
21 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
22 Plaintiffs at the BKK Class I Facility.

23 503. According to historical BKK Corp. records, Defendant Menasha
24 Corp., and its successors and/or predecessors, contributed manifested waste to the
25 BKK Class I Facility. This manifested waste contained Hazardous Substances that
26 Defendant Menasha Corp. generated and/or arranged for its disposal at the BKK
27 Class I Facility. To date, Defendant Menasha Corp. has not incurred any costs at the
28

1 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
2 at the BKK Class I Facility.

3 504. According to historical BKK Corp. records, Defendant Merit Oil Co.,
4 and its successors and/or predecessors, contributed manifested waste to the BKK
5 Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Merit Oil Co. generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant Merit Oil Co. has not incurred any costs at the
8 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
9 at the BKK Class I Facility.

10 505. According to historical BKK Corp. records, Defendant Metal Treaters
11 Inc., and its successors and/or predecessors, contributed manifested waste to the
12 BKK Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Metal Treaters Inc. generated and/or arranged for its disposal at the BKK
14 Class I Facility. To date, Defendant Metal Treaters Inc. has not incurred any costs
15 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
16 Plaintiffs at the BKK Class I Facility.

17 506. According to historical BKK Corp. records, Defendant Metlox Pottery,
18 and its successors and/or predecessors, contributed manifested waste to the BKK
19 Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Metlox Pottery generated and/or arranged for its disposal at the BKK
21 Class I Facility. To date, Defendant Metlox Pottery has not incurred any costs at the
22 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
23 at the BKK Class I Facility.

24 507. According to historical BKK Corp. records, Defendant Metropolitan
25 Circuits Inc., and its successors and/or predecessors, contributed manifested waste
26 to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant Metropolitan Circuits Inc. generated and/or arranged for
28 its disposal at the BKK Class I Facility. To date, Defendant Metropolitan Circuits

1 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
2 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 508. According to historical BKK Corp. records, Defendant Miller Dial
4 Corp., and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Miller Dial Corp. generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant Miller Dial Corp. has not incurred any costs at
8 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
9 Plaintiffs at the BKK Class I Facility.

10 509. According to historical BKK Corp. records, Defendant Milo
11 Equipment Co., and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant Milo Equipment Co. generated and/or arranged for its
14 disposal at the BKK Class I Facility. To date, Defendant Milo Equipment Co. has
15 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
16 costs incurred by the Plaintiffs at the BKK Class I Facility.

17 510. According to historical BKK Corp. records, Defendant Mission Plating
18 Co., and its successors and/or predecessors, contributed manifested waste to the
19 BKK Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Mission Plating Co. generated and/or arranged for its disposal at the
21 BKK Class I Facility. To date, Defendant Mission Plating Co. has not incurred any
22 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
23 the Plaintiffs at the BKK Class I Facility.

24 511. According to historical BKK Corp. records, Defendant Modern
25 Coatings Inc., and its successors and/or predecessors, contributed manifested waste
26 to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant Modern Coatings Inc. generated and/or arranged for its
28 disposal at the BKK Class I Facility. To date, Defendant Modern Coatings Inc. has

1 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
2 costs incurred by the Plaintiffs at the BKK Class I Facility.

3 512. According to historical BKK Corp. records, Defendant Modern Plating
4 Co., and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Modern Plating Co. generated and/or arranged for its disposal at the
7 BKK Class I Facility. To date, Defendant Modern Plating Co. has not incurred any
8 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
9 the Plaintiffs at the BKK Class I Facility.

10 513. According to historical BKK Corp. records, Defendant Modine
11 Manufacturing Co., and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant Modine Manufacturing Co. generated and/or arranged
14 for its disposal at the BKK Class I Facility. To date, Defendant Modine
15 Manufacturing Co. has not incurred any costs at the BKK Class I Facility nor has it
16 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

17 514. According to historical BKK Corp. records, Defendant Mola
18 Development Corporation, and its successors and/or predecessors, contributed
19 manifested waste to the BKK Class I Facility. This manifested waste contained
20 Hazardous Substances that Defendant Mola Development Corporation. Generated
21 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
22 Mola Development Corporation has not incurred any costs at the BKK Class I
23 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
24 Class I Facility.

25 515. According to historical BKK Corp. records, Defendant Monitor
26 Plating & Anodizing, and its successors and/or predecessors, contributed
27 manifested waste to the BKK Class I Facility. This manifested waste contained
28 Hazardous Substances that Defendant Monitor Plating & Anodizing generated

1 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
2 Monitor Plating & Anodizing has not incurred any costs at the BKK Class I Facility
3 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
4 Facility.

5 516. According to historical BKK Corp. records, Defendant
6 Monogram/Peacock Manufacturing, and its successors and/or predecessors,
7 contributed manifested waste to the BKK Class I Facility. This manifested waste
8 contained Hazardous Substances that Defendant Monogram/Peacock
9 Manufacturing generated and/or arranged for its disposal at the BKK Class I
10 Facility. To date, Defendant Monogram/Peacock Manufacturing has not incurred
11 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
12 by the Plaintiffs at the BKK Class I Facility.

13 517. According to historical BKK Corp. records, Defendant Motor
14 Processors Inc., and its successors and/or predecessors, contributed manifested
15 waste to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Motor Processors Inc. generated and/or arranged for its
17 disposal at the BKK Class I Facility. To date, Defendant Motor Processors Inc. has
18 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
19 costs incurred by the Plaintiffs at the BKK Class I Facility.

20 518. According to historical BKK Corp. records, Defendant MPC
21 Industries, and its successors and/or predecessors, contributed manifested waste to
22 the BKK Class I Facility. This manifested waste contained Hazardous Substances
23 that Defendant MPC Industries generated and/or arranged for its disposal at the
24 BKK Class I Facility. To date, Defendant MPC Industries has not incurred any
25 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
26 the Plaintiffs at the BKK Class I Facility.

27 519. According to historical BKK Corp. records, Defendant Mustang
28 Equipment Co., and its successors and/or predecessors, contributed manifested

1 waste to the BKK Class I Facility. This manifested waste contained Hazardous
2 Substances that Defendant Mustang Equipment Co. generated and/or arranged for
3 its disposal at the BKK Class I Facility. To date, Defendant Mustang Equipment
4 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
5 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

6 520. According to historical BKK Corp. records, Defendant Nardon
7 Manufacturing Co. Inc., and its successors and/or predecessors, contributed
8 manifested waste to the BKK Class I Facility. This manifested waste contained
9 Hazardous Substances that Defendant Nardon Manufacturing Co. Inc. generated
10 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
11 Nardon Manufacturing Co. Inc. has not incurred any costs at the BKK Class I
12 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
13 Class I Facility.

14 521. According to historical BKK Corp. records, Defendant National Paint
15 & Varnish Co. Inc., and its successors and/or predecessors, contributed manifested
16 waste to the BKK Class I Facility. This manifested waste contained Hazardous
17 Substances that Defendant National Paint & Varnish Co. Inc. generated and/or
18 arranged for its disposal at the BKK Class I Facility. To date, Defendant National
19 Paint & Varnish Co. Inc. has not incurred any costs at the BKK Class I Facility nor
20 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
21 Facility.

22 522. According to historical BKK Corp. records, Defendant National
23 Standard Co., and its successors and/or predecessors, contributed manifested waste
24 to the BKK Class I Facility. This manifested waste contained Hazardous
25 Substances that Defendant National Standard Co. generated and/or arranged for its
26 disposal at the BKK Class I Facility. To date, Defendant National Standard Co. has
27 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
28 costs incurred by the Plaintiffs at the BKK Class I Facility.

1 523. According to historical BKK Corp. records, Defendant National
2 Technology, and its successors and/or predecessors, contributed manifested waste
3 to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant National Technology generated and/or arranged for its
5 disposal at the BKK Class I Facility. To date, Defendant National Technology has
6 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
7 costs incurred by the Plaintiffs at the BKK Class I Facility.

8 524. According to historical BKK Corp. records, Defendant Nattier
9 Manufacturing Co., and its successors and/or predecessors, contributed manifested
10 waste to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant Nattier Manufacturing Co. generated and/or arranged for
12 its disposal at the BKK Class I Facility. To date, Defendant Nattier Manufacturing
13 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
14 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 525. According to historical BKK Corp. records, Defendant Nelco Oil
16 Refining Corp., and its successors and/or predecessors, contributed manifested
17 waste to the BKK Class I Facility. This manifested waste contained Hazardous
18 Substances that Defendant Nelco Oil Refining Corp. generated and/or arranged for
19 its disposal at the BKK Class I Facility. To date, Defendant Nelco Oil Refining
20 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
21 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

22 526. Upon information and belief, Defendant New Bastion Development,
23 Inc. is the successor to Defendant Jetronic Industries Inc. and/or otherwise liable for
24 manifested waste that was contributed to the BKK Class I Facility by Defendant
25 Jetronic Industries Inc. According to historical BKK Corp. records, Defendant
26 Jetronic Industries Inc. contributed manifested waste to the BKK Class I Facility.
27 This manifested waste contained Hazardous Substances that Defendant Jetronic
28 Industries Inc. generated and/or arranged for its disposal at the BKK Class I

1 Facility. To date, Defendant New Bastion Development, Inc. has not incurred any
2 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
3 the Plaintiffs at the BKK Class I Facility.

4 527. According to historical BKK Corp. records, Defendant Newhall
5 Refining Co. Inc., and its successors and/or predecessors, contributed manifested
6 waste to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Newhall Refining Co. Inc. generated and/or arranged for
8 its disposal at the BKK Class I Facility. To date, Defendant Newhall Refining Co.
9 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
10 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

11 528. According to historical BKK Corp. records, Defendant Newport
12 Electronics Inc., and its successors and/or predecessors, contributed manifested
13 waste to the BKK Class I Facility. This manifested waste contained Hazardous
14 Substances that Defendant Newport Electronics Inc. generated and/or arranged for
15 its disposal at the BKK Class I Facility. To date, Defendant Newport Electronics
16 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
17 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

18 529. According to historical BKK Corp. records, Defendant Nordskog Co.
19 Inc., and its successors and/or predecessors, contributed manifested waste to the
20 BKK Class I Facility. This manifested waste contained Hazardous Substances that
21 Defendant Nordskog Co. Inc. generated and/or arranged for its disposal at the BKK
22 Class I Facility. To date, Defendant Nordskog Co. Inc. has not incurred any costs at
23 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
24 Plaintiffs at the BKK Class I Facility.

25 530. According to historical BKK Corp. records, Defendant Norman High
26 Demolition, and its successors and/or predecessors, contributed manifested waste to
27 the BKK Class I Facility. This manifested waste contained Hazardous Substances
28 that Defendant Norman High Demolition generated and/or arranged for its disposal

1 at the BKK Class I Facility. To date, Defendant Norman High Demolition has not
2 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
3 incurred by the Plaintiffs at the BKK Class I Facility.

4 531. According to historical BKK Corp. records, Defendant Northern
5 Telecom, and its successors and/or predecessors, contributed manifested waste to
6 the BKK Class I Facility. This manifested waste contained Hazardous Substances
7 that Defendant Northern Telecom generated and/or arranged for its disposal at the
8 BKK Class I Facility. To date, Defendant Northern Telecom has not incurred any
9 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
10 the Plaintiffs at the BKK Class I Facility.

11 532. According to historical BKK Corp. records, Defendant Norton & Son
12 of California Inc., and its successors and/or predecessors, contributed manifested
13 waste to the BKK Class I Facility. This manifested waste contained Hazardous
14 Substances that Defendant Norton & Son of California Inc. generated and/or
15 arranged for its disposal at the BKK Class I Facility. To date, Defendant Norton &
16 Son of California Inc. has not incurred any costs at the BKK Class I Facility nor has
17 it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

18 533. According to historical BKK Corp. records, Defendant Now
19 Construction Corp., and its successors and/or predecessors, contributed manifested
20 waste to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Defendant Now Construction Corp. generated and/or arranged for
22 its disposal at the BKK Class I Facility. To date, Defendant Now Construction
23 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
24 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

25 534. According to historical BKK Corp. records, Defendant Nu Way
26 Plating Co. Inc., and its successors and/or predecessors, contributed manifested
27 waste to the BKK Class I Facility. This manifested waste contained Hazardous
28 Substances that Defendant Nu Way Plating Co. Inc. generated and/or arranged for

1 its disposal at the BKK Class I Facility. To date, Defendant Nu Way Plating Co.
2 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
3 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

4 535. According to historical BKK Corp. records, Defendant Oil Co., and its
5 successors and/or predecessors, contributed manifested waste to the BKK Class I
6 Facility. This manifested waste contained Hazardous Substances that Defendant
7 Oil Co. generated and/or arranged for its disposal at the BKK Class I Facility. To
8 date, Defendant Oil Co. has not incurred any costs at the BKK Class I Facility nor
9 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
10 Facility.

11 536. According to historical BKK Corp. records, Defendant Oilfields
12 Trucking Co., and its successors and/or predecessors, contributed manifested waste
13 to the BKK Class I Facility. This manifested waste contained Hazardous
14 Substances that Defendant Oilfields Trucking Co. generated and/or arranged for its
15 disposal at the BKK Class I Facility. To date, Defendant Oilfields Trucking Co. has
16 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
17 costs incurred by the Plaintiffs at the BKK Class I Facility.

18 537. According to historical BKK Corp. records, Defendant Oil Well
19 Service Co., and its successors and/or predecessors, contributed manifested waste to
20 the BKK Class I Facility. This manifested waste contained Hazardous Substances
21 that Defendant Oil Well Service Co. generated and/or arranged for its disposal at
22 the BKK Class I Facility. To date, Defendant Oil Well Service Co. has not incurred
23 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
24 by the Plaintiffs at the BKK Class I Facility.

25 538. According to historical BKK Corp. records, Defendant Olmstead
26 Trucking, and its successors and/or predecessors, contributed manifested waste to
27 the BKK Class I Facility. This manifested waste contained Hazardous Substances
28 that Defendant Olmstead Trucking generated and/or arranged for its disposal at the

1 BKK Class I Facility. To date, Defendant Olmstead Trucking has not incurred any
2 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
3 the Plaintiffs at the BKK Class I Facility.

4 539. According to historical BKK Corp. records, Defendant Olympic
5 Plating & Polishing Inc., and its successors and/or predecessors, contributed
6 manifested waste to the BKK Class I Facility. This manifested waste contained
7 Hazardous Substances that Defendant Olympic Plating & Polishing Inc. generated
8 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
9 Olympic Plating & Polishing Inc. has not incurred any costs at the BKK Class I
10 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
11 Class I Facility.

12 540. According to historical BKK Corp. records, Defendant Omar
13 Industries, and its successors and/or predecessors, contributed manifested waste to
14 the BKK Class I Facility. This manifested waste contained Hazardous Substances
15 that Defendant Omar Industries generated and/or arranged for its disposal at the
16 BKK Class I Facility. To date, Defendant Omar Industries has not incurred any
17 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
18 the Plaintiffs at the BKK Class I Facility.

19 541. According to historical BKK Corp. records, Defendant Omega Oil Co.
20 Inc., and its successors and/or predecessors, contributed manifested waste to the
21 BKK Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Omega Oil Co. Inc. generated and/or arranged for its disposal at the
23 BKK Class I Facility. To date, Defendant Omega Oil Co. Inc. has not incurred any
24 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
25 the Plaintiffs at the BKK Class I Facility.

26 542. According to historical BKK Corp. records, Defendant Ontario Auto
27 Truck Plaza, and its successors and/or predecessors, contributed manifested waste
28 to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Defendant Ontario Auto Truck Plaza generated and/or arranged for
2 its disposal at the BKK Class I Facility. To date, Defendant Ontario Auto Truck
3 Plaza has not incurred any costs at the BKK Class I Facility nor has it paid its fair
4 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

5 543. According to historical BKK Corp. records, Defendant Orange Coast
6 Plating Inc., and its successors and/or predecessors, contributed manifested waste to
7 the BKK Class I Facility. This manifested waste contained Hazardous Substances
8 that Defendant Orange Coast Plating Inc. generated and/or arranged for its disposal
9 at the BKK Class I Facility. To date, Defendant Orange Coast Plating Inc. has not
10 incurred any costs at the BKK Class I Facility nor has it paid its Fair share of costs
11 incurred by the Plaintiffs at the BKK Class I Facility.

12 544. According to historical BKK Corp. records, Defendant Orange County
13 Dust Control Inc., and its successors and/or predecessors, contributed manifested
14 waste to the BKK Class I Facility. This manifested waste contained Hazardous
15 Substances that Defendant Orange County Dust Control Inc. generated and/or
16 arranged for its disposal at the BKK Class I Facility. To date, Defendant Orange
17 County Dust Control Inc. has not incurred any costs at the BKK Class I Facility nor
18 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
19 Facility.

20 545. According to historical BKK Corp. records, Defendant Orange County
21 Electronics Corp., and its successors and/or predecessors, contributed manifested
22 waste to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Orange County Electronics Corp. generated and/or
24 arranged for its disposal at the BKK Class I Facility. To date, Defendant Orange
25 County Electronics Corp. has not incurred any costs at the BKK Class I Facility nor
26 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
27 Facility.

28

1 546. According to historical BKK Corp. records, Defendant Orange Heights
2 Orange Association, and its successors and/or predecessors, contributed manifested
3 waste to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant Orange Heights Orange Association generated and/or
5 arranged for its disposal at the BKK Class I Facility. To date, Defendant Orange
6 Heights Orange Association has not incurred any costs at the BKK Class I Facility
7 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
8 Facility.

9 547. According to historical BKK Corp. records, Defendant Orange Co.
10 Machine Works, and its successors and/or predecessors, contributed manifested
11 waste to the BKK Class I Facility. This manifested waste contained Hazardous
12 Substances that Defendant Orange Co. Machine Works generated and/or arranged
13 for its disposal at the BKK Class I Facility. To date, Defendant Orange Co.
14 Machine Works has not incurred any costs at the BKK Class I Facility nor has it
15 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

16 548. According to historical BKK Corp. records, Defendant Orange
17 Precision Circuits, and its successors and/or predecessors, contributed manifested
18 waste to the BKK Class I Facility. This manifested waste contained Hazardous
19 Substances that Defendant Orange Precision Circuits generated and/or arranged for
20 its disposal at the BKK Class I Facility. To date, Defendant Orange Precision
21 Circuits has not incurred any costs at the BKK Class I Facility nor has it paid its
22 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 549. According to historical BKK Corp. records, Defendant Orchids Paper
24 Products Co., and its successors and/or predecessors, contributed manifested waste
25 to the BKK Class I Facility. This manifested waste contained Hazardous
26 Substances that Defendant Orchids Paper Products Co. generated and/or arranged
27 for its disposal at the BKK Class I Facility. To date, Defendant Orchids Paper
28

1 Products Co. has not incurred any costs at the BKK Class I Facility nor has it paid
2 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 550. According to historical BKK Corp. records, Defendant Ozalid Corp.,
4 and its successors and/or predecessors, contributed manifested waste to the BKK
5 Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Ozalid Corp. generated and/or arranged for its disposal at the BKK Class
7 I Facility. To date, Defendant Ozalid Corp. has not incurred any costs at the BKK
8 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
9 BKK Class I Facility.

10 551. According to historical BKK Corp. records, Defendant Ozite
11 Corporation, and its successors and/or predecessors, contributed manifested waste
12 to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant Ozite Corporation generated and/or arranged for its
14 disposal at the BKK Class I Facility. To date, Defendant Ozite Corporation has not
15 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
16 incurred by the Plaintiffs at the BKK Class I Facility.

17 552. According to historical BKK Corp. records, Defendant P. C. World
18 Orange County, and its successors and/or predecessors, contributed manifested
19 waste to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Defendant P. C. World Orange County generated and/or arranged
21 for its disposal at the BKK Class I Facility. To date, Defendant P. C. World Orange
22 County has not incurred any costs at the BKK Class I Facility nor has it paid its fair
23 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 553. According to historical BKK Corp. records, Defendant P. W. Stephens
25 Contractors Inc., and its successors and/or predecessors, contributed manifested
26 waste to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant P. W. Stephens Contractors Inc. generated and/or
28 arranged for its disposal at the BKK Class I Facility. To date, Defendant P. W.

1 Stephens Contractors Inc. has not incurred any costs at the BKK Class I Facility nor
2 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
3 Facility.

4 554. According to historical BKK Corp. records, Defendant Pacific
5 Airmotive Corp., and its successors and/or predecessors, contributed manifested
6 waste to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Pacific Airmotive Corp. generated and/or arranged for
8 its disposal at the BKK Class I Facility. To date, Defendant Pacific Airmotive Corp.
9 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
10 of costs incurred by the Plaintiffs at the BKK Class I Facility.

11 555. According to historical BKK Corp. records, Defendant Pacific Coast
12 Warehouse Corp., and its successors and/or predecessors, contributed manifested
13 waste to the BKK Class I Facility. This manifested waste contained Hazardous
14 Substances that Defendant Pacific Coast Warehouse Corp. generated and/or
15 arranged for its disposal at the BKK Class I Facility. To date, Defendant Pacific
16 Coast Warehouse Corp. has not incurred any costs at the BKK Class I Facility nor
17 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
18 Facility.

19 556. According to historical BKK Corp. records, Defendant Pacific Engine,
20 and its successors and/or predecessors, contributed manifested waste to the BKK
21 Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Pacific Engine generated and/or arranged for its disposal at the BKK
23 Class I Facility. To date, Defendant Pacific Engine has not incurred any costs at the
24 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
25 at the BKK Class I Facility.

26 557. According to historical BKK Corp. records, Defendant Pacific
27 Financial Center, and its successors and/or predecessors, contributed manifested
28 waste to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Defendant Pacific Financial Center generated and/or arranged for
2 its disposal at the BKK Class I Facility. To date, Defendant Pacific Financial
3 Center has not incurred any costs at the BKK Class I Facility nor has it paid its fair
4 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

5 558. According to historical BKK Corp. records, Defendant Pacific Oasis,
6 and its successors and/or predecessors, contributed manifested waste to the BKK
7 Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Pacific Oasis generated and/or arranged for its disposal at the BKK
9 Class I Facility. To date, Defendant Pacific Oasis has not incurred any costs at the
10 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
11 at the BKK Class I Facility.

12 559. According to historical BKK Corp. records, Defendant Pacific
13 Precision Metals, and its successors and/or predecessors, contributed manifested
14 waste to the BKK Class I Facility. This manifested waste contained Hazardous
15 Substances that Defendant Pacific Precision Metals generated and/or arranged for
16 its disposal at the BKK Class I Facility. To date, Defendant Pacific Precision
17 Metals has not incurred any costs at the BKK Class I Facility nor has it paid its fair
18 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

19 560. According to historical BKK Corp. records, Defendant Pacific Press,
20 and its successors and/or predecessors, contributed manifested waste to the BKK
21 Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Pacific Press generated and/or arranged for its disposal at the BKK Class
23 I Facility. To date, Defendant Pacific Press has not incurred any costs at the BKK
24 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
25 BKK Class I Facility.

26 561. According to historical BKK Corp. records, Defendant Pacific
27 Treatment Corp., and its successors and/or predecessors, contributed manifested
28 waste to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Defendant Pacific Treatment Corp. generated and/or arranged for
2 its disposal at the BKK Class I Facility. To date, Defendant Pacific Treatment Corp.
3 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
4 of costs incurred by the Plaintiffs at the BKK Class I Facility.

5 562. According to historical BKK Corp. records, Defendant Pacific Tube
6 Co., and its successors and/or predecessors, contributed manifested waste to the
7 BKK Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Pacific Tube Co. generated and/or arranged for its disposal at the BKK
9 Class I Facility. To date, Defendant Pacific Tube Co. has not incurred any costs at
10 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
11 Plaintiffs at the BKK Class I Facility.

12 563. According to historical BKK Corp. records, Defendant Pacific
13 Vacuum Truck Co., and its successors and/or predecessors, contributed manifested
14 waste to the BKK Class I Facility. This manifested waste contained Hazardous
15 Substances that Defendant Pacific Vacuum Truck Co. generated and/or arranged for
16 its disposal at the BKK Class I Facility. To date, Defendant Pacific Vacuum Truck
17 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
18 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

19 564. According to historical BKK Corp. records, Defendant Pacific Valves,
20 and its successors and/or predecessors, contributed manifested waste to the BKK
21 Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Pacific Valves generated and/or arranged for its disposal at the BKK
23 Class I Facility. To date, Defendant Pacific Valves has not incurred any costs at the
24 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
25 at the BKK Class I Facility.

26 565. According to historical BKK Corp. records, Defendant Pacifica Plating
27 Inc., and its successors and/or predecessors, contributed manifested waste to the
28 BKK Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant Pacifica Plating Inc. generated and/or arranged for its disposal at the
2 BKK Class I Facility. To date, Defendant Pacifica Plating Inc. has not incurred any
3 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
4 the Plaintiffs at the BKK Class I Facility.

5 566. According to historical BKK Corp. records, Defendant Pactra Co., and
6 its successors and/or predecessors, contributed manifested waste to the BKK Class I
7 Facility. This manifested waste contained Hazardous Substances that Defendant
8 Pactra Co. generated and/or arranged for its disposal at the BKK Class I Facility.
9 To date, Defendant Pactra Co. has not incurred any costs at the BKK Class I
10 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
11 Class I Facility.

12 567. According to historical BKK Corp. records, Defendant Palace Plating
13 Co., and its successors and/or predecessors, contributed manifested waste to the
14 BKK Class I Facility. This manifested waste contained Hazardous Substances that
15 Defendant Palace Plating Co. generated and/or arranged for its disposal at the BKK
16 Class I Facility. To date, Defendant Palace Plating Co. has not incurred any costs at
17 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
18 Plaintiffs at the BKK Class I Facility.

19 568. According to historical BKK Corp. records, Defendant Pan Western
20 Oil Co., and its successors and/or predecessors, contributed manifested waste to the
21 BKK Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Pan Western Oil Co. generated and/or arranged for its disposal at the
23 BKK Class I Facility. To date, Defendant Pan Western Oil Co. has not incurred any
24 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
25 the Plaintiffs at the BKK Class I Facility.

26 569. According to historical BKK Corp. records, Defendant Park Metal Co.,
27 and its successors and/or predecessors, contributed manifested waste to the BKK
28 Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant Park Metal Co. generated and/or arranged for its disposal at the BKK
2 Class I Facility. To date, Defendant Park Metal Co. has not incurred any costs at the
3 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
4 at the BKK Class I Facility.

5 570. According to historical BKK Corp. records, Defendant Parsley &
6 Kennedy, and its successors and/or predecessors, contributed manifested waste to
7 the BKK Class I Facility. This manifested waste contained Hazardous Substances
8 that Defendant Parsley & Kennedy generated and/or arranged for its disposal at the
9 BKK Class I Facility. To date, Defendant Parsley & Kennedy has not incurred any
10 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
11 the Plaintiffs at the BKK Class I Facility.

12 571. According to historical BKK Corp. records, Defendant Pascoe
13 Building Systems, and its successors and/or predecessors, contributed manifested
14 waste to the BKK Class I Facility. This manifested waste contained Hazardous
15 Substances that Defendant Pascoe Building Systems generated and/or arranged for
16 its disposal at the BKK Class I Facility. To date, Defendant Pascoe Building
17 Systems has not incurred any costs at the BKK Class I Facility nor has it paid its
18 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

19 572. According to historical BKK Corp. records, Defendant PCA Metal
20 Finishing Inc., and its successors and/or predecessors, contributed manifested waste
21 to the BKK Class I Facility. This manifested waste contained Hazardous
22 Substances that Defendant PCA Metal Finishing Inc. generated and/or arranged for
23 its disposal at the BKK Class I Facility. To date, Defendant PCA Metal Finishing
24 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
25 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

26 573. According to historical BKK Corp. records, Defendant Pease & Curren
27 Reliable Recovery Inc., and its successors and/or predecessors, contributed
28 manifested waste to the BKK Class I Facility. This manifested waste contained

1 Hazardous Substances that Defendant Pease & Curren Reliable Recovery Inc.
2 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
3 Defendant Pease & Curren Reliable Recovery Inc. has not incurred any costs at the
4 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
5 at the BKK Class I Facility.

6 574. Upon information and belief, Defendant Pembina is the successor to
7 Defendant De Calta International and/or otherwise liable for manifested waste that
8 was contributed to the BKK Class I Facility by Defendant De Calta International.
9 According to historical BKK Corp. records, Defendant De Calta International, and
10 its successors and/or predecessors, contributed manifested waste to the BKK Class I
11 Facility. This manifested waste contained Hazardous Substances that Defendant
12 De Calta International generated and/or arranged for its disposal at the BKK Class I
13 Facility. To date, Defendant Pembina has not incurred any costs at the BKK Class
14 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
15 Class I Facility.

16 575. According to historical BKK Corp. records, Defendant Pepper
17 Industries Inc., and its successors and/or predecessors, contributed manifested
18 waste to the BKK Class I Facility. This manifested waste contained Hazardous
19 Substances that Defendant Pepper Industries Inc. generated and/or arranged for its
20 disposal at the BKK Class I Facility. To date, Defendant Pepper Industries Inc. has
21 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
22 costs incurred by the Plaintiffs at the BKK Class I Facility.

23 576. According to historical BKK Corp. records, Defendant Perlite
24 Processing, and its successors and/or predecessors, contributed manifested waste to
25 the BKK Class I Facility. This manifested waste contained Hazardous Substances
26 that Defendant Perlite Processing generated and/or arranged for its disposal at the
27 BKK Class I Facility. To date, Defendant Perlite Processing has not incurred any
28

1 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
2 the Plaintiffs at the BKK Class I Facility.

3 577. According to historical BKK Corp. records, Defendant Permalab
4 Equipment Corp., and its successors and/or predecessors, contributed manifested
5 waste to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant Permalab Equipment Corp. generated and/or arranged
7 for its disposal at the BKK Class I Facility. To date, Defendant Permalab
8 Equipment Corp. has not incurred any costs at the BKK Class I Facility nor has it
9 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 578. According to historical BKK Corp. records, Defendant Peterson
11 Manufacturing Co. Inc., and its successors and/or predecessors, contributed
12 manifested waste to the BKK Class I Facility. This manifested waste contained
13 Hazardous Substances that Defendant Peterson Manufacturing Co. Inc. generated
14 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
15 Peterson Manufacturing Co. Inc. has not incurred any costs at the BKK Class I
16 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
17 Class I Facility.

18 579. According to historical BKK Corp. records, Defendant Petro Lewis
19 Corp., and its successors and/or predecessors, contributed manifested waste to the
20 BKK Class I Facility. This manifested waste contained Hazardous Substances that
21 Defendant Petro Lewis Corp. generated and/or arranged for its disposal at the BKK
22 Class I Facility. To date, Defendant Petro Lewis Corp. has not incurred any costs at
23 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
24 Plaintiffs at the BKK Class I Facility.

25 580. According to historical BKK Corp. records, Defendant Petrochemicals
26 Co. Inc., and its successors and/or predecessors, contributed manifested waste to the
27 BKK Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Petrochemicals Co. Inc. generated and/or arranged for its disposal at the

1 BKK Class I Facility. To date, Defendant Petrochemicals Co. Inc. has not incurred
2 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
3 by the Plaintiffs at the BKK Class I Facility.

4 581. According to historical BKK Corp. records, Defendant Phototron
5 Corp., and its successors and/or predecessors, contributed manifested waste to the
6 BKK Class I Facility. This manifested waste contained Hazardous Substances that
7 Defendant Phototron Corp. generated and/or arranged for its disposal at the BKK
8 Class I Facility. To date, Defendant Phototron Corp. has not incurred any costs at
9 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
10 Plaintiffs at the BKK Class I Facility.

11 582. According to historical BKK Corp. records, Defendant Pichel
12 Industries Inc., and its successors and/or predecessors, contributed manifested
13 waste to the BKK Class I Facility. This manifested waste contained Hazardous
14 Substances that Defendant Pichel Industries Inc. generated and/or arranged for its
15 disposal at the BKK Class I Facility. To date, Defendant Pichel Industries Inc. has
16 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
17 costs incurred by the Plaintiffs at the BKK Class I Facility.

18 583. According to historical BKK Corp. records, Defendant PL Porter Co.,
19 and its successors and/or predecessors, contributed manifested waste to the BKK
20 Class I Facility. This manifested waste contained Hazardous Substances that
21 Defendant PL Porter Co. generated and/or arranged for its disposal at the BKK
22 Class I Facility. To date, Defendant PL Porter Co. has not incurred any costs at the
23 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
24 at the BKK Class I Facility.

25 584. According to historical BKK Corp. records, Defendant Plastic Dress-
26 Up Corp., and its successors and/or predecessors, contributed manifested waste to
27 the BKK Class I Facility. This manifested waste contained Hazardous Substances
28 that Defendant Plastic Dress-Up Corp. generated and/or arranged for its disposal at

1 the BKK Class I Facility. To date, Defendant Plastic Dress-Up Corp. has not
2 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
3 incurred by the Plaintiffs at the BKK Class I Facility.

4 585. According to historical BKK Corp. records, Defendant Poly Disc
5 System Inc., and its successors and/or predecessors, contributed manifested waste
6 to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Poly Disc System Inc. generated and/or arranged for its
8 disposal at the BKK Class I Facility. To date, Defendant Poly Disc System Inc. has
9 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
10 costs incurred by the Plaintiffs at the BKK Class I Facility.

11 586. According to historical BKK Corp. records, Defendant Polyester
12 Hutco Group, and its successors and/or predecessors, contributed manifested waste
13 to the BKK Class I Facility. This manifested waste contained Hazardous
14 Substances that Defendant Polyester Hutco Group generated and/or arranged for its
15 disposal at the BKK Class I Facility. To date, Defendant Polyester Hutco Group has
16 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
17 costs incurred by the Plaintiffs at the BKK Class I Facility.

18 587. According to historical BKK Corp. records, Defendant Polymer
19 Development Labs Inc., and its successors and/or predecessors, contributed
20 manifested waste to the BKK Class I Facility. This manifested waste contained
21 Hazardous Substances that Defendant Polymer Development Labs Inc. generated
22 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
23 Polymer Development Labs Inc. has not incurred any costs at the BKK Class I
24 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
25 Class I Facility.

26 588. According to historical BKK Corp. records, Defendant Post
27 Transportation Co., and its successors and/or predecessors, contributed manifested
28 waste to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Defendant Post Transportation Co. generated and/or arranged for its
2 disposal at the BKK Class I Facility. To date, Defendant Post Transportation Co.
3 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
4 of costs incurred by the Plaintiffs at the BKK Class I Facility.

5 589. According to historical BKK Corp. records, Defendant Powerline
6 Sales, and its successors and/or predecessors, contributed manifested waste to the
7 BKK Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Powerline Sales generated and/or arranged for its disposal at the BKK
9 Class I Facility. To date, Defendant Powerline Sales has not incurred any costs at
10 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
11 Plaintiffs at the BKK Class I Facility.

12 590. According to historical BKK Corp. records, Defendant PQ
13 Corporation, and its successors and/or predecessors, contributed manifested waste
14 to the BKK Class I Facility. This manifested waste contained Hazardous
15 Substances that Defendant PQ Corporation generated and/or arranged for its
16 disposal at the BKK Class I Facility. To date, Defendant PQ Corporation has not
17 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
18 incurred by the Plaintiffs at the BKK Class I Facility.

19 591. According to historical BKK Corp. records, Defendant Pre Recording
20 Co., and its successors and/or predecessors, contributed manifested waste to the
21 BKK Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Pre Recording Co. generated and/or arranged for its disposal at the BKK
23 Class I Facility. To date, Defendant Pre Recording Co. has not incurred any costs at
24 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
25 Plaintiffs at the BKK Class I Facility.

26 592. According to historical BKK Corp. records, Defendant Precipitator
27 Inc., and its successors and/or predecessors, contributed manifested waste to the
28 BKK Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant Precipitator Inc. generated and/or arranged for its disposal at the BKK
2 Class I Facility. To date, Defendant Precipitator Inc. has not incurred any costs at
3 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
4 Plaintiffs at the BKK Class I Facility.

5 593. According to historical BKK Corp. records, Defendant Precision
6 Anodizing & Plating Inc., and its successors and/or predecessors, contributed
7 manifested waste to the BKK Class I Facility. This manifested waste contained
8 Hazardous Substances that Defendant Precision Anodizing & Plating Inc. generated
9 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
10 Precision Anodizing & Plating Inc. has not incurred any costs at the BKK Class I
11 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
12 Class I Facility.

13 594. According to historical BKK Corp. records, Defendant Precision Heat
14 Treating Co., and its successors and/or predecessors, contributed manifested waste
15 to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Precision Heat Treating Co. generated and/or arranged
17 for its disposal at the BKK Class I Facility. To date, Defendant Precision Heat
18 Treating Co. has not incurred any costs at the BKK Class I Facility nor has it paid
19 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

20 595. According to historical BKK Corp. records, Defendant Premiere
21 Alum. Prod. Inc., and its successors and/or predecessors, contributed manifested
22 waste to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Premiere Alum. Prod. Inc. generated and/or arranged for
24 its disposal at the BKK Class I Facility. To date, Defendant Premiere Alum. Prod.
25 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
26 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 596. According to historical BKK Corp. records, Defendant President
28 Lincoln, and its successors and/or predecessors, contributed manifested waste to the

1 BKK Class I Facility. This manifested waste contained Hazardous Substances that
2 Defendant President Lincoln generated and/or arranged for its disposal at the BKK
3 Class I Facility. To date, Defendant President Lincoln has not incurred any costs at
4 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
5 Plaintiffs at the BKK Class I Facility.

6 597. According to historical BKK Corp. records, Defendant Process
7 Technology Co., and its successors and/or predecessors, contributed manifested
8 waste to the BKK Class I Facility. This manifested waste contained Hazardous
9 Substances that Defendant Process Technology Co. generated and/or arranged for
10 its disposal at the BKK Class I Facility. To date, Defendant Process Technology
11 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
12 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

13 598. According to historical BKK Corp. records, Defendant Production
14 Plating Co., and its successors and/or predecessors, contributed manifested waste to
15 the BKK Class I Facility. This manifested waste contained Hazardous Substances
16 that Defendant Production Plating Co. generated and/or arranged for its disposal at
17 the BKK Class I Facility. To date, Defendant Production Plating Co. has not
18 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
19 incurred by the Plaintiffs at the BKK Class I Facility.

20 599. According to historical BKK Corp. records, Defendant Products
21 Engineering Corp., and its successors and/or predecessors, contributed manifested
22 waste to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Products Engineering Corp. generated and/or arranged
24 for its disposal at the BKK Class I Facility. To date, Defendant Products
25 Engineering Corp. has not incurred any costs at the BKK Class I Facility nor has it
26 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 600. According to historical BKK Corp. records, Defendant Prototech
28 Circuitry, and its successors and/or predecessors, contributed manifested waste to

1 the BKK Class I Facility. This manifested waste contained Hazardous Substances
2 that Defendant Prototech Circuitry generated and/or arranged for its disposal at the
3 BKK Class I Facility. To date, Defendant Prototech Circuitry has not incurred any
4 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
5 the Plaintiffs at the BKK Class I Facility.

6 601. According to historical BKK Corp. records, Defendant PSI West, and
7 its successors and/or predecessors, contributed manifested waste to the BKK Class I
8 Facility. This manifested waste contained Hazardous Substances that Defendant
9 PSI West generated and/or arranged for its disposal at the BKK Class I Facility. To
10 date, Defendant PSI West has not incurred any costs at the BKK Class I Facility nor
11 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
12 Facility.

13 602. Upon information and belief, Defendant PTM & W Industries Inc. is
14 the successor to Defendant Wyndam Manufacturing Co. Inc. and/or otherwise
15 liable for manifested waste that was contributed to the BKK Class I Facility by
16 Defendant Wyndam Manufacturing Co. Inc. According to historical BKK Corp.
17 records, Defendant Wyndam Manufacturing Co. Inc. contributed manifested waste
18 to the BKK Class I Facility. This manifested waste contained Hazardous
19 Substances that Defendant Wyndam Manufacturing Co. Inc. generated and/or
20 arranged for its disposal at the BKK Class I Facility. To date, Defendant PTM &
21 W Industries Inc. has not incurred any costs at the BKK Class I Facility nor has it
22 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 603. According to historical BKK Corp. records, Defendant Punch Press
24 Products, and its successors and/or predecessors, contributed manifested waste to
25 the BKK Class I Facility. This manifested waste contained Hazardous Substances
26 that Defendant Punch Press Products generated and/or arranged for its disposal at
27 the BKK Class I Facility. To date, Defendant Punch Press Products has not incurred
28

1 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
2 by the Plaintiffs at the BKK Class I Facility.

3 604. According to historical BKK Corp. records, Defendant PVO
4 International, and its successors and/or predecessors, contributed manifested waste
5 to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant PVO International generated and/or arranged for its
7 disposal at the BKK Class I Facility. To date, Defendant PVO International has not
8 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
9 incurred by the Plaintiffs at the BKK Class I Facility.

10 605. According to historical BKK Corp. records, Defendant Quality
11 Aluminum Forge Co., and its successors and/or predecessors, contributed
12 manifested waste to the BKK Class I Facility. This manifested waste contained
13 Hazardous Substances that Defendant Quality Aluminum Forge Co. generated
14 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
15 Quality Aluminum Forge Co. has not incurred any costs at the BKK Class I Facility
16 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
17 Facility.

18 606. According to historical BKK Corp. records, Defendant Quality Farms,
19 and its successors and/or predecessors, contributed manifested waste to the BKK
20 Class I Facility. This manifested waste contained Hazardous Substances that
21 Defendant Quality Farms generated and/or arranged for its disposal at the BKK
22 Class I Facility. To date, Defendant Quality Farms has not incurred any costs at the
23 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
24 at the BKK Class I Facility.

25 607. According to historical BKK Corp. records, Defendant Quality Metal
26 Finishing Co., and its successors and/or predecessors, contributed manifested waste
27 to the BKK Class I Facility. This manifested waste contained Hazardous
28 Substances that Defendant Quality Metal Finishing Co. generated and/or arranged

1 for its disposal at the BKK Class I Facility. To date, Defendant Quality Metal
2 Finishing Co. has not incurred any costs at the BKK Class I Facility nor has it paid
3 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

4 608. According to historical BKK Corp. records, Defendant Quality
5 Sprayers Inc., and its successors and/or predecessors, contributed manifested waste
6 to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Quality Sprayers Inc. generated and/or arranged for its
8 disposal at the BKK Class I Facility. To date, Defendant Quality Sprayers Inc. has
9 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
10 costs incurred by the Plaintiffs at the BKK Class I Facility.

11 609. According to historical BKK Corp. records, Defendant R. & E. Plating
12 Co., and its successors and/or predecessors, contributed manifested waste to the
13 BKK Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant R. & E. Plating Co. generated and/or arranged for its disposal at the
15 BKK Class I Facility. To date, Defendant R. & E. Plating Co. has not incurred any
16 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
17 the Plaintiffs at the BKK Class I Facility.

18 610. According to historical BKK Corp. records, Defendant R. & R.
19 Industrial Waste Haulers Inc., and its successors and/or predecessors, contributed
20 manifested waste to the BKK Class I Facility. This manifested waste contained
21 Hazardous Substances that Defendant R. & R. Industrial Waste Haulers Inc.
22 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
23 Defendant R. & R. Industrial Waste Haulers Inc. has not incurred any costs at the
24 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
25 at the BKK Class I Facility.

26 611. According to historical BKK Corp. records, Defendant R. G. Wallace
27 Co. Inc., and its successors and/or predecessors, contributed manifested waste to the
28 BKK Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant R. G. Wallace Co. Inc. generated and/or arranged for its disposal at the
2 BKK Class I Facility. To date, Defendant R. G. Wallace Co. Inc. has not incurred
3 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
4 by the Plaintiffs at the BKK Class I Facility.

5 612. According to historical BKK Corp. records, Defendant Rainbow
6 Trucking Co., and its successors and/or predecessors, contributed manifested waste
7 to the BKK Class I Facility. This manifested waste contained Hazardous
8 Substances that Defendant Rainbow Trucking Co. generated and/or arranged for its
9 disposal at the BKK Class I Facility. To date, Defendant Rainbow Trucking Co. has
10 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
11 costs incurred by the Plaintiffs at the BKK Class I Facility.

12 613. According to historical BKK Corp. records, Defendant Rayne Water
13 Systems, and its successors and/or predecessors, contributed manifested waste to
14 the BKK Class I Facility. This manifested waste contained Hazardous Substances
15 that Defendant Rayne Water Systems generated and/or arranged for its disposal at
16 the BKK Class I Facility. To date, Defendant Rayne Water Systems has not
17 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
18 incurred by the Plaintiffs at the BKK Class I Facility.

19 614. According to historical BKK Corp. records, Defendant Real Property
20 West Inc., and its successors and/or predecessors, contributed manifested waste to
21 the BKK Class I Facility. This manifested waste contained Hazardous Substances
22 that Defendant Real Property West Inc. generated and/or arranged for its disposal at
23 the BKK Class I Facility. To date, Defendant Real Property West Inc. has not
24 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
25 incurred by the Plaintiffs at the BKK Class I Facility.

26 615. According to historical BKK Corp. records, Defendant Rebel Oil Co.
27 Inc., and its successors and/or predecessors, contributed manifested waste to the
28 BKK Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant Rebel Oil Co. Inc. generated and/or arranged for its disposal at the BKK
2 Class I Facility. To date, Defendant Rebel Oil Co. Inc. has not incurred any costs at
3 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
4 Plaintiffs at the BKK Class I Facility.

5 616. According to historical BKK Corp. records, Defendant Redi-Strip Co.
6 Inc., and its successors and/or predecessors, contributed manifested waste to the
7 BKK Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Redi-Strip Co. Inc. generated and/or arranged for its disposal at the BKK
9 Class I Facility. To date, Defendant Redi-Strip Co. Inc. has not incurred any costs
10 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
11 Plaintiffs at the BKK Class I Facility.

12 617. According to historical BKK Corp. records, Defendant Redondo Oil
13 Co., and its successors and/or predecessors, contributed manifested waste to the
14 BKK Class I Facility. This manifested waste contained Hazardous Substances that
15 Defendant Redondo Oil Co. generated and/or arranged for its disposal at the BKK
16 Class I Facility. To date, Defendant Redondo Oil Co. has not incurred any costs at
17 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
18 Plaintiffs at the BKK Class I Facility.

19 618. According to historical BKK Corp. records, Defendant Refiners
20 Marketing Co., and its successors and/or predecessors, contributed manifested
21 waste to the BKK Class I Facility. This manifested waste contained Hazardous
22 Substances that Defendant Refiners Marketing Co. generated and/or arranged for its
23 disposal at the BKK Class I Facility. To date, Defendant Refiners Marketing Co.
24 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
25 of costs incurred by the Plaintiffs at the BKK Class I Facility.

26 619. According to historical BKK Corp. records, Defendant Reliable
27 Recovery Inc., and its successors and/or predecessors, contributed manifested waste
28 to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Defendant Reliable Recovery Inc. generated and/or arranged for its
2 disposal at the BKK Class I Facility. To date, Defendant Reliable Recovery Inc. has
3 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
4 costs incurred by the Plaintiffs at the BKK Class I Facility.

5 620. Upon information and belief, Defendant Rentokil North America, Inc.
6 is the successor to Defendant Target Chemical Co. and/or otherwise liable for
7 manifested waste that was contributed to the BKK Class I Facility by Defendant
8 Target Chemical Co. According to historical BKK Corp. records, Defendant Target
9 Chemical Co. contributed manifested waste to the BKK Class I Facility. This
10 manifested waste contained Hazardous Substances that Defendant Target Chemical
11 Co. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
12 Defendant Rentokil North America, Inc. has not incurred any costs at the BKK
13 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
14 BKK Class I Facility.

15 621. According to historical BKK Corp. records, Defendant Renu Plating
16 Co. Inc., and its successors and/or predecessors, contributed manifested waste to the
17 BKK Class I Facility. This manifested waste contained Hazardous Substances that
18 Defendant Renu Plating Co. Inc. generated and/or arranged for its disposal at the
19 BKK Class I Facility. To date, Defendant Renu Plating Co. Inc. has not incurred
20 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
21 by the Plaintiffs at the BKK Class I Facility.

22 622. According to historical BKK Corp. records, Defendant Revere
23 Extruders Inc., and its successors and/or predecessors, contributed manifested waste
24 to the BKK Class I Facility. This manifested waste contained Hazardous
25 Substances that Defendant Revere Extruders Inc. generated and/or arranged for its
26 disposal at the BKK Class I Facility. To date, Defendant Revere Extruders Inc. has
27 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
28 costs incurred by the Plaintiffs at the BKK Class I Facility.

1 623. According to historical BKK Corp. records, Defendant Rex Precision
2 Products Inc., and its successors and/or predecessors, contributed manifested waste
3 to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant Rex Precision Products Inc. generated and/or arranged
5 for its disposal at the BKK Class I Facility. To date, Defendant Rex Precision
6 Products Inc. has not incurred any costs at the BKK Class I Facility nor has it paid
7 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

8 624. According to historical BKK Corp. records, Defendant Rexart Corp.,
9 and its successors and/or predecessors, contributed manifested waste to the BKK
10 Class I Facility. This manifested waste contained Hazardous Substances that
11 Defendant Rexart Corp. generated and/or arranged for its disposal at the BKK Class
12 I Facility. To date, Defendant Rexart Corp. has not incurred any costs at the BKK
13 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
14 BKK Class I Facility.

15 625. According to historical BKK Corp. records, Defendant Rheem Metals
16 Inc., and its successors and/or predecessors, contributed manifested waste to the
17 BKK Class I Facility. This manifested waste contained Hazardous Substances that
18 Defendant Rheem Metals Inc. generated and/or arranged for its disposal at the BKK
19 Class I Facility. To date, Defendant Rheem Metals Inc. has not incurred any costs at
20 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
21 Plaintiffs at the BKK Class I Facility.

22 626. According to historical BKK Corp. records, Defendant Rho Chem
23 Corp., and its successors and/or predecessors, contributed manifested waste to the
24 BKK Class I Facility. This manifested waste contained Hazardous Substances that
25 Defendant Rho Chem Corp. generated and/or arranged for its disposal at the BKK
26 Class I Facility. To date, Defendant Rho Chem Corp. has not incurred any costs at
27 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
28 Plaintiffs at the BKK Class I Facility.

1 627. According to historical BKK Corp. records, Defendant RHS Carpet
2 Mill, and its successors and/or predecessors, contributed manifested waste to the
3 BKK Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant RHS Carpet Mill generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant RHS Carpet Mill has not incurred any costs at
6 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
7 Plaintiffs at the BKK Class I Facility.

8 628. According to historical BKK Corp. records, Defendant Richardson &
9 Holland, and its successors and/or predecessors, contributed manifested waste to
10 the BKK Class I Facility. This manifested waste contained Hazardous Substances
11 that Defendant Richardson & Holland generated and/or arranged for its disposal at
12 the BKK Class I Facility. To date, Defendant Richardson & Holland has not
13 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
14 incurred by the Plaintiffs at the BKK Class I Facility.

15 629. According to historical BKK Corp. records, Defendant Richlynn
16 Technology Inc., and its successors and/or predecessors, contributed manifested
17 waste to the BKK Class I Facility. This manifested waste contained Hazardous
18 Substances that Defendant Richlynn Technology Inc. generated and/or arranged for
19 its disposal at the BKK Class I Facility. To date, Defendant Richlynn Technology
20 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
21 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

22 630. According to historical BKK Corp. records, Defendant Rinchem Co.
23 Inc., and its successors and/or predecessors, contributed manifested waste to the
24 BKK Class I Facility. This manifested waste contained Hazardous Substances that
25 Defendant Rinchem Co. Inc. generated and/or arranged for its disposal at the BKK
26 Class I Facility. To date, Defendant Rinchem Co. Inc. has not incurred any costs at
27 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
28 Plaintiffs at the BKK Class I Facility.

1 631. According to historical BKK Corp. records, Defendant Riverside
2 Cement Co., and its successors and/or predecessors, contributed manifested waste
3 to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant Riverside Cement Co. generated and/or arranged for its
5 disposal at the BKK Class I Facility. To date, Defendant Riverside Cement Co. has
6 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
7 costs incurred by the Plaintiffs at the BKK Class I Facility.

8 632. According to historical BKK Corp. records, Defendant Robert Keith &
9 Co. Inc., and its successors and/or predecessors, contributed manifested waste to the
10 BKK Class I Facility. This manifested waste contained Hazardous Substances that
11 Defendant Robert Keith & Co. Inc. generated and/or arranged for its disposal at the
12 BKK Class I Facility. To date, Defendant Robert Keith & Co. Inc. has not incurred
13 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
14 by the Plaintiffs at the BKK Class I Facility.

15 633. According to historical BKK Corp. records, Defendant Rocket
16 Industries, and its successors and/or predecessors, contributed manifested waste to
17 the BKK Class I Facility. This manifested waste contained Hazardous Substances
18 that Defendant Rocket Industries generated and/or arranged for its disposal at the
19 BKK Class I Facility. To date, Defendant Rocket Industries has not incurred any
20 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
21 the Plaintiffs at the BKK Class I Facility.

22 634. According to historical BKK Corp. records, Defendant Rodding
23 Cleaning Service, and its successors and/or predecessors, contributed manifested
24 waste to the BKK Class I Facility. This manifested waste contained Hazardous
25 Substances that Defendant Rodding Cleaning Service generated and/or arranged for
26 its disposal at the BKK Class I Facility. To date, Defendant Rodding Cleaning
27 Service has not incurred any costs at the BKK Class I Facility nor has it paid its fair
28 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 635. According to historical BKK Corp. records, Defendant Roehl Disposal
2 Services, and its successors and/or predecessors, contributed manifested waste to
3 the BKK Class I Facility. This manifested waste contained Hazardous Substances
4 that Defendant Roehl Disposal Services generated and/or arranged for its disposal
5 at the BKK Class I Facility. To date, Defendant Roehl Disposal Services has not
6 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
7 incurred by the Plaintiffs at the BKK Class I Facility.

8 636. According to historical BKK Corp. records, Defendant Rohrig
9 Brothers, and its successors and/or predecessors, contributed manifested waste to
10 the BKK Class I Facility. This manifested waste contained Hazardous Substances
11 that Defendant Rohrig Brothers generated and/or arranged for its disposal at the
12 BKK Class I Facility. To date, Defendant Rohrig Brothers has not incurred any
13 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
14 the Plaintiffs at the BKK Class I Facility.

15 637. According to historical BKK Corp. records, Defendant Ronald M.
16 Jones, and its successors and/or predecessors, contributed manifested waste to the
17 BKK Class I Facility. This manifested waste contained Hazardous Substances that
18 Defendant Ronald M. Jones generated and/or arranged for its disposal at the BKK
19 Class I Facility. To date, Defendant Ronald M. Jones has not incurred any costs at
20 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
21 Plaintiffs at the BKK Class I Facility.

22 638. According to historical BKK Corp. records, Defendant Ronson
23 Hydraulic Corp., and its successors and/or predecessors, contributed manifested
24 waste to the BKK Class I Facility. This manifested waste contained Hazardous
25 Substances that Defendant Ronson Hydraulic Corp. generated and/or arranged for
26 its disposal at the BKK Class I Facility. To date, Defendant Ronson Hydraulic
27 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
28 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 639. According to historical BKK Corp. records, Defendant Rose Hills
2 Memorial Park Association, and its successors and/or predecessors, contributed
3 manifested waste to the BKK Class I Facility. This manifested waste contained
4 Hazardous Substances that Defendant Rose Hills Memorial Park Association
5 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
6 Defendant Rose Hills Memorial Park Association has not incurred any costs at the
7 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
8 at the BKK Class I Facility.

9 640. According to historical BKK Corp. records, Defendant Rosens Elect.
10 Equip. Co., and its successors and/or predecessors, contributed manifested waste to
11 the BKK Class I Facility. This manifested waste contained Hazardous Substances
12 that Defendant Rosens Elect. Equip. Co. generated and/or arranged for its disposal
13 at the BKK Class I Facility. To date, Defendant Rosens Elect. Equip. Co. has not
14 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
15 incurred by the Plaintiffs at the BKK Class I Facility.

16 641. According to historical BKK Corp. records, Defendant Rotary Offset
17 Printers, and its successors and/or predecessors, contributed manifested waste to the
18 BKK Class I Facility. This manifested waste contained Hazardous Substances that
19 Defendant Rotary Offset Printers generated and/or arranged for its disposal at the
20 BKK Class I Facility. To date, Defendant Rotary Offset Printers has not incurred
21 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
22 by the Plaintiffs at the BKK Class I Facility.

23 642. According to historical BKK Corp. records, Defendant Routh
24 Transportation, and its successors and/or predecessors, contributed manifested
25 waste to the BKK Class I Facility. This manifested waste contained Hazardous
26 Substances that Defendant Routh Transportation generated and/or arranged for its
27 disposal at the BKK Class I Facility. To date, Defendant Routh Transportation has
28

1 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
2 costs incurred by the Plaintiffs at the BKK Class I Facility.

3 643. According to historical BKK Corp. records, Defendant Royal Plating
4 Works, and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Royal Plating Works generated and/or arranged for its disposal at the
7 BKK Class I Facility. To date, Defendant Royal Plating Works has not incurred any
8 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
9 the Plaintiffs at the BKK Class I Facility.

10 644. According to historical BKK Corp. records, Defendant Rupes
11 Hydraulics, and its successors and/or predecessors, contributed manifested waste to
12 the BKK Class I Facility. This manifested waste contained Hazardous Substances
13 that Defendant Rupes Hydraulics generated and/or arranged for its disposal at the
14 BKK Class I Facility. To date, Defendant Rupes Hydraulics has not incurred any
15 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
16 the Plaintiffs at the BKK Class I Facility.

17 645. According to historical BKK Corp. records, Defendant Russell
18 Burdsall & Ward Inc., and its successors and/or predecessors, contributed
19 manifested waste to the BKK Class I Facility. This manifested waste contained
20 Hazardous Substances that Defendant Russell Burdsall & Ward Inc. generated
21 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
22 Russell Burdsall & Ward Inc. has not incurred any costs at the BKK Class I Facility
23 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
24 Facility.

25 646. According to historical BKK Corp. records, Defendant Rutherford Oil
26 Co., and its successors and/or predecessors, contributed manifested waste to the
27 BKK Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Rutherford Oil Co. generated and/or arranged for its disposal at the BKK

1 Class I Facility. To date, Defendant Rutherford Oil Co. has not incurred any costs
2 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
3 Plaintiffs at the BKK Class I Facility.

4 647. According to historical BKK Corp. records, Defendant S. Rose
5 Cooperage, and its successors and/or predecessors, contributed manifested waste to
6 the BKK Class I Facility. This manifested waste contained Hazardous Substances
7 that Defendant S. Rose Cooperage generated and/or arranged for its disposal at the
8 BKK Class I Facility. To date, Defendant S. Rose Cooperage has not incurred any
9 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
10 the Plaintiffs at the BKK Class I Facility.

11 648. According to historical BKK Corp. records, Defendant S. T. & I. Inc.,
12 and its successors and/or predecessors, contributed manifested waste to the BKK
13 Class I Facility. This manifested waste contained Hazardous Substances that
14 Defendant S. T. & I. Inc. generated and/or arranged for its disposal at the BKK
15 Class I Facility. To date, Defendant S. T. & I. Inc. has not incurred any costs at the
16 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
17 at the BKK Class I Facility.

18 649. According to historical BKK Corp. records, Defendant Safetran
19 Systems Corp., and its successors and/or predecessors, contributed manifested
20 waste to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Defendant Safetran Systems Corp. generated and/or arranged for its
22 disposal at the BKK Class I Facility. To date, Defendant Safetran Systems Corp.
23 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
24 of costs incurred by the Plaintiffs at the BKK Class I Facility.

25 650. According to historical BKK Corp. records, Defendant Sals Plating,
26 and its successors and/or predecessors, contributed manifested waste to the BKK
27 Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Sals Plating generated and/or arranged for its disposal at the BKK Class

1 I Facility. To date, Defendant Sals Plating has not incurred any costs at the BKK
2 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
3 BKK Class I Facility.

4 651. According to historical BKK Corp. records, Defendant San Fernando
5 Electric Manufacturing Co., and its successors and/or predecessors, contributed
6 manifested waste to the BKK Class I Facility. This manifested waste contained
7 Hazardous Substances that Defendant San Fernando Electric Manufacturing Co.
8 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
9 Defendant San Fernando Electric Manufacturing Co. has not incurred any costs at
10 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
11 Plaintiffs at the BKK Class I Facility.

12 652. According to historical BKK Corp. records, Defendant Santa Ana
13 Diesel, and its successors and/or predecessors, contributed manifested waste to the
14 BKK Class I Facility. This manifested waste contained Hazardous Substances that
15 Defendant Santa Ana Diesel generated and/or arranged for its disposal at the BKK
16 Class I Facility. To date, Defendant Santa Ana Diesel has not incurred any costs at
17 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
18 Plaintiffs at the BKK Class I Facility.

19 653. According to historical BKK Corp. records, Defendant Santa Monica
20 College, and its successors and/or predecessors, contributed manifested waste to the
21 BKK Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Santa Monica College generated and/or arranged for its disposal at the
23 BKK Class I Facility. To date, Defendant Santa Monica College has not incurred
24 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
25 by the Plaintiffs at the BKK Class I Facility.

26 654. According to historical BKK Corp. records, Defendant Schlitz
27 Brewing Co., and its successors and/or predecessors, contributed manifested waste
28 to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Defendant Schlitz Brewing Co. generated and/or arranged for its
2 disposal at the BKK Class I Facility. To date, Defendant Schlitz Brewing Co. has
3 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
4 costs incurred by the Plaintiffs at the BKK Class I Facility.

5 655. According to historical BKK Corp. records, Defendant Scovill Inc.,
6 and its successors and/or predecessors, contributed manifested waste to the BKK
7 Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Scovill Inc. generated and/or arranged for its disposal at the BKK Class I
9 Facility. To date, Defendant Scovill Inc. has not incurred any costs at the BKK
10 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
11 BKK Class I Facility.

12 656. According to historical BKK Corp. records, Defendant SCS Industries,
13 and its successors and/or predecessors, contributed manifested waste to the BKK
14 Class I Facility. This manifested waste contained Hazardous Substances that
15 Defendant SCS Industries generated and/or arranged for its disposal at the BKK
16 Class I Facility. To date, Defendant SCS Industries has not incurred any costs at the
17 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
18 at the BKK Class I Facility.

19 657. According to historical BKK Corp. records, Defendant Sea Lift
20 Maritime, and its successors and/or predecessors, contributed manifested waste to
21 the BKK Class I Facility. This manifested waste contained Hazardous Substances
22 that Defendant Sea Lift Maritime generated and/or arranged for its disposal at the
23 BKK Class I Facility. To date, Defendant Sea Lift Maritime has not incurred any
24 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
25 the Plaintiffs at the BKK Class I Facility.

26 658. According to historical BKK Corp. records, Defendant Security
27 Environmental Systems, and its successors and/or predecessors, contributed
28 manifested waste to the BKK Class I Facility. This manifested waste contained

1 Hazardous Substances that Defendant Security Environmental Systems generated
2 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
3 Security Environmental Systems has not incurred any costs at the BKK Class I
4 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
5 Class I Facility.

6 659. According to historical BKK Corp. records, Defendant Shafco
7 Industries Inc., and its successors and/or predecessors, contributed manifested
8 waste to the BKK Class I Facility. This manifested waste contained Hazardous
9 Substances that Defendant Shafco Industries Inc. generated and/or arranged for its
10 disposal at the BKK Class I Facility. To date, Defendant Shafco Industries Inc. has
11 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
12 costs incurred by the Plaintiffs at the BKK Class I Facility.

13 660. According to historical BKK Corp. records, Defendant Shasta Pan Oil
14 Co., and its successors and/or predecessors, contributed manifested waste to the
15 BKK Class I Facility. This manifested waste contained Hazardous Substances that
16 Defendant Shasta Pan Oil Co. generated and/or arranged for its disposal at the BKK
17 Class I Facility. To date, Defendant Shasta Pan Oil Co. has not incurred any costs at
18 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
19 Plaintiffs at the BKK Class I Facility.

20 661. According to historical BKK Corp. records, Defendant Sierra Pacific
21 Container Corp., and its successors and/or predecessors, contributed manifested
22 waste to the BKK Class I Facility. This manifested waste contained Hazardous
23 Substances that Defendant Sierra Pacific Container Corp. generated and/or arranged
24 for its disposal at the BKK Class I Facility. To date, Defendant Sierra Pacific
25 Container Corp. has not incurred any costs at the BKK Class I Facility nor has it
26 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 662. According to historical BKK Corp. records, Defendant Singer
28 Aerospace, and its successors and/or predecessors, contributed manifested waste to

1 the BKK Class I Facility. This manifested waste contained Hazardous Substances
2 that Defendant Singer Aerospace generated and/or arranged for its disposal at the
3 BKK Class I Facility. To date, Defendant Singer Aerospace has not incurred any
4 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
5 the Plaintiffs at the BKK Class I Facility.

6 663. According to historical BKK Corp. records, Defendant Snow Summit
7 Ski Corp., and its successors and/or predecessors, contributed manifested waste to
8 the BKK Class I Facility. This manifested waste contained Hazardous Substances
9 that Defendant Snow Summit Ski Corp. generated and/or arranged for its disposal
10 at the BKK Class I Facility. To date, Defendant Snow Summit Ski Corp. has not
11 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
12 incurred by the Plaintiffs at the BKK Class I Facility.

13 664. According to historical BKK Corp. records, Defendant SoCal
14 Finishing Co., and its successors and/or predecessors, contributed manifested waste
15 to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant SoCal Finishing Co. generated and/or arranged for its
17 disposal at the BKK Class I Facility. To date, Defendant SoCal Finishing Co. has
18 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
19 costs incurred by the Plaintiffs at the BKK Class I Facility.

20 665. Upon information and belief, Defendant Soco West, Inc. is the
21 successor to Defendant Stinnes Western Chemical Corp. and/or otherwise liable for
22 manifested waste that was contributed to the BKK Class I Facility by Defendant
23 Stinnes Western Chemical Corp. According to historical BKK Corp. records,
24 Defendant Stinnes Western Chemical Corp. contributed manifested waste to the
25 BKK Class I Facility. This manifested waste contained Hazardous Substances that
26 Defendant Stinnes Western Chemical Corp. generated and/or arranged for its
27 disposal at the BKK Class I Facility. To date, Defendant Soco West, Inc. has not
28

1 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
2 incurred by the Plaintiffs at the BKK Class I Facility.

3 666. According to historical BKK Corp. records, Defendant Solutia Inc.,
4 and its successors and/or predecessors, contributed manifested waste to the BKK
5 Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Solutia Inc. generated and/or arranged for its disposal at the BKK Class I
7 Facility. To date, Defendant Solutia Inc. has not incurred any costs at the BKK
8 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
9 BKK Class I Facility.

10 667. According to historical BKK Corp. records, Defendant Sonic Plating
11 Co., and its successors and/or predecessors, contributed manifested waste to the
12 BKK Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Sonic Plating Co. generated and/or arranged for its disposal at the BKK
14 Class I Facility. To date, Defendant Sonic Plating Co. has not incurred any costs at
15 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
16 Plaintiffs at the BKK Class I Facility.

17 668. According to historical BKK Corp. records, Defendant Ssp
18 Construction Equipment Inc., and its successors and/or predecessors, contributed
19 manifested waste to the BKK Class I Facility. This manifested waste contained
20 Hazardous Substances that Defendant Ssp Construction Equipment Inc. generated
21 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant Ssp
22 Construction Equipment Inc. has not incurred any costs at the BKK Class I Facility
23 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
24 Facility.

25 669. According to historical BKK Corp. records, Defendant Supracote Inc.,
26 and its successors and/or predecessors, contributed manifested waste to the BKK
27 Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Supracote Inc. generated and/or arranged for its disposal at the BKK

1 Class I Facility. To date, Defendant Supracote Inc. has not incurred any costs at the
2 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
3 at the BKK Class I Facility.

4 670. According to historical BKK Corp. records, Defendant Southern
5 California Waste Reduction, and its successors and/or predecessors, contributed
6 manifested waste to the BKK Class I Facility. This manifested waste contained
7 Hazardous Substances that Defendant Southern California Waste Reduction
8 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
9 Defendant Southern California Waste Reduction has not incurred any costs at the
10 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
11 at the BKK Class I Facility.

12 671. According to historical BKK Corp. records, Defendant Soule Steel
13 Co., and its successors and/or predecessors, contributed manifested waste to the
14 BKK Class I Facility. This manifested waste contained Hazardous Substances that
15 Defendant Soule Steel Co. generated and/or arranged for its disposal at the BKK
16 Class I Facility. To date, Defendant Soule Steel Co. has not incurred any costs at
17 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
18 Plaintiffs at the BKK Class I Facility.

19 672. According to historical BKK Corp. records, Defendant South Coast
20 County Water District, and its successors and/or predecessors, contributed
21 manifested waste to the BKK Class I Facility. This manifested waste contained
22 Hazardous Substances that Defendant South Coast County Water District generated
23 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
24 South Coast County Water District has not incurred any costs at the BKK Class I
25 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
26 Class I Facility.

27 673. According to historical BKK Corp. records, Defendant Southern
28 California Drum Co., and its successors and/or predecessors, contributed

1 manifested waste to the BKK Class I Facility. This manifested waste contained
2 Hazardous Substances that Defendant Southern California Drum Co. generated
3 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
4 Southern California Drum Co. has not incurred any costs at the BKK Class I
5 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
6 Class I Facility.

7 674. According to historical BKK Corp. records, Defendant Southwest
8 Aircraft Services, and its successors and/or predecessors, contributed manifested
9 waste to the BKK Class I Facility. This manifested waste contained Hazardous
10 Substances that Defendant Southwest Aircraft Services generated and/or arranged
11 for its disposal at the BKK Class I Facility. To date, Defendant Southwest Aircraft
12 Services has not incurred any costs at the BKK Class I Facility nor has it paid its
13 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

14 675. According to historical BKK Corp. records, Defendant Southwest
15 Metal Co., and its successors and/or predecessors, contributed manifested waste to
16 the BKK Class I Facility. This manifested waste contained Hazardous Substances
17 that Defendant Southwest Metal Co. generated and/or arranged for its disposal at
18 the BKK Class I Facility. To date, Defendant Southwest Metal Co. has not incurred
19 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
20 by the Plaintiffs at the BKK Class I Facility.

21 676. According to historical BKK Corp. records, Defendant Southwest
22 Petro Chemical, and its successors and/or predecessors, contributed manifested
23 waste to the BKK Class I Facility. This manifested waste contained Hazardous
24 Substances that Defendant Southwest Petro Chemical generated and/or arranged for
25 its disposal at the BKK Class I Facility. To date, Defendant Southwest Petro
26 Chemical has not incurred any costs at the BKK Class I Facility nor has it paid its
27 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

28

1 677. According to historical BKK Corp. records, Defendant Southwest
2 Processors Inc., and its successors and/or predecessors, contributed manifested
3 waste to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant Southwest Processors Inc. generated and/or arranged for
5 its disposal at the BKK Class I Facility. To date, Defendant Southwest Processors
6 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
7 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

8 678. According to historical BKK Corp. records, Defendant Southwestern
9 Alloys Inc., and its successors and/or predecessors, contributed manifested waste to
10 the BKK Class I Facility. This manifested waste contained Hazardous Substances
11 that Defendant Southwestern Alloys Inc. generated and/or arranged for its disposal
12 at the BKK Class I Facility. To date, Defendant Southwestern Alloys Inc. has not
13 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
14 incurred by the Plaintiffs at the BKK Class I Facility.

15 679. According to historical BKK Corp. records, Defendant Space
16 Ordinance Systems, and its successors and/or predecessors, contributed manifested
17 waste to the BKK Class I Facility. This manifested waste contained Hazardous
18 Substances that Defendant Space Ordinance Systems generated and/or arranged for
19 its disposal at the BKK Class I Facility. To date, Defendant Space Ordinance
20 Systems has not incurred any costs at the BKK Class I Facility nor has it paid its
21 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

22 680. According to historical BKK Corp. records, Defendant Specific
23 Plating Co. Inc., and its successors and/or predecessors, contributed manifested
24 waste to the BKK Class I Facility. This manifested waste contained Hazardous
25 Substances that Defendant Specific Plating Co. Inc. generated and/or arranged for
26 its disposal at the BKK Class I Facility. To date, Defendant Specific Plating Co.
27 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
28 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 681. According to historical BKK Corp. records, Defendant Spectrum
2 Chemical Manufacturing Inc., and its successors and/or predecessors, contributed
3 manifested waste to the BKK Class I Facility. This manifested waste contained
4 Hazardous Substances that Defendant Spectrum Chemical Manufacturing Inc.
5 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
6 Defendant Spectrum Chemical Manufacturing Inc. has not incurred any costs at the
7 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
8 at the BKK Class I Facility.

9 682. According to historical BKK Corp. records, Defendant Spirit
10 Silkscreen, and its successors and/or predecessors, contributed manifested waste to
11 the BKK Class I Facility. This manifested waste contained Hazardous Substances
12 that Defendant Spirit Silkscreen generated and/or arranged for its disposal at the
13 BKK Class I Facility. To date, Defendant Spirit Silkscreen has not incurred any
14 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
15 the Plaintiffs at the BKK Class I Facility.

16 683. According to historical BKK Corp. records, Defendant Standard
17 Brands Paint Co. Inc., and its successors and/or predecessors, contributed
18 manifested waste to the BKK Class I Facility. This manifested waste contained
19 Hazardous Substances that Defendant Standard Brands Paint Co. Inc. generated
20 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
21 Standard Brands Paint Co. Inc. has not incurred any costs at the BKK Class I
22 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
23 Class I Facility.

24 684. According to historical BKK Corp. records, Defendant Standard
25 Crankshaft Inc., and its successors and/or predecessors, contributed manifested
26 waste to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant Standard Crankshaft Inc. generated and/or arranged for
28 its disposal at the BKK Class I Facility. To date, Defendant Standard Crankshaft

1 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
2 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 685. According to historical BKK Corp. records, Defendant Standard Felt
4 Co., and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Standard Felt Co. generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant Standard Felt Co. has not incurred any costs at
8 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
9 Plaintiffs at the BKK Class I Facility.

10 686. According to historical BKK Corp. records, Defendant Standard
11 Nickel Chromium Plating, and its successors and/or predecessors, contributed
12 manifested waste to the BKK Class I Facility. This manifested waste contained
13 Hazardous Substances that Defendant Standard Nickel Chromium Plating generated
14 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
15 Standard Nickel Chromium Plating has not incurred any costs at the BKK Class I
16 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
17 Class I Facility.

18 687. According to historical BKK Corp. records, Defendant Standun Inc.,
19 and its successors and/or predecessors, contributed manifested waste to the BKK
20 Class I Facility. This manifested waste contained Hazardous Substances that
21 Defendant Standun Inc. generated and/or arranged for its disposal at the BKK Class
22 I Facility. To date, Defendant Standun Inc. has not incurred any costs at the BKK
23 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
24 BKK Class I Facility.

25 688. According to historical BKK Corp. records, Defendant Stang
26 Hydronics, and its successors and/or predecessors, contributed manifested waste to
27 the BKK Class I Facility. This manifested waste contained Hazardous Substances
28 that Defendant Stang Hydronics generated and/or arranged for its disposal at the

1 BKK Class I Facility. To date, Defendant Stang Hydronics has not incurred any
2 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
3 the Plaintiffs at the BKK Class I Facility.

4 689. According to historical BKK Corp. records, Defendant Star Nameplate
5 Co., and its successors and/or predecessors, contributed manifested waste to the
6 BKK Class I Facility. This manifested waste contained Hazardous Substances that
7 Defendant Star Nameplate Co. generated and/or arranged for its disposal at the
8 BKK Class I Facility. To date, Defendant Star Nameplate Co. has not incurred any
9 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
10 the Plaintiffs at the BKK Class I Facility.

11 690. According to historical BKK Corp. records, Defendant Statewide
12 Environmental Services, and its successors and/or predecessors, contributed
13 manifested waste to the BKK Class I Facility. This manifested waste contained
14 Hazardous Substances that Defendant Statewide Environmental Services generated
15 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
16 Statewide Environmental Services has not incurred any costs at the BKK Class I
17 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
18 Class I Facility.

19 691. According to historical BKK Corp. records, Defendant Stephen C.
20 Groat Development, and its successors and/or predecessors, contributed manifested
21 waste to the BKK Class I Facility. This manifested waste contained Hazardous
22 Substances that Defendant Stephen C. Groat Development generated and/or
23 arranged for its disposal at the BKK Class I Facility. To date, Defendant Stephen C.
24 Groat Development has not incurred any costs at the BKK Class I Facility nor has it
25 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

26 692. According to historical BKK Corp. records, Defendant Steponovich &
27 Long, and its successors and/or predecessors, contributed manifested waste to the
28 BKK Class I Facility. This manifested waste contained Hazardous Substances that

1 Defendant Steponovich & Long generated and/or arranged for its disposal at the
2 BKK Class I Facility. To date, Defendant Steponovich & Long has not incurred any
3 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
4 the Plaintiffs at the BKK Class I Facility.

5 693. According to historical BKK Corp. records, Defendant Steverson Bros,
6 and its successors and/or predecessors, contributed manifested waste to the BKK
7 Class I Facility. This manifested waste contained Hazardous Substances that
8 Defendant Steverson Bros generated and/or arranged for its disposal at the BKK
9 Class I Facility. To date, Defendant Steverson Bros has not incurred any costs at the
10 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
11 at the BKK Class I Facility.

12 694. According to historical BKK Corp. records, Defendant Stinnes
13 Western Chemical Corp., and its successors and/or predecessors, contributed
14 manifested waste to the BKK Class I Facility. This manifested waste contained
15 Hazardous Substances that Defendant Stinnes Western Chemical Corp. generated
16 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
17 Stinnes Western Chemical Corp. has not incurred any costs at the BKK Class I
18 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
19 Class I Facility.

20 695. According to historical BKK Corp. records, Defendant Summit Ink
21 Co., and its successors and/or predecessors, contributed manifested waste to the
22 BKK Class I Facility. This manifested waste contained Hazardous Substances that
23 Defendant Summit Ink Co. generated and/or arranged for its disposal at the BKK
24 Class I Facility. To date, Defendant Summit Ink Co. has not incurred any costs at
25 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
26 Plaintiffs at the BKK Class I Facility.

27 696. According to historical BKK Corp. records, Defendant Super Tech,
28 and its successors and/or predecessors, contributed manifested waste to the BKK

1 Class I Facility. This manifested waste contained Hazardous Substances that
2 Defendant Super Tech generated and/or arranged for its disposal at the BKK Class I
3 Facility. To date, Defendant Super Tech has not incurred any costs at the BKK
4 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
5 BKK Class I Facility.

6 697. According to historical BKK Corp. records, Defendant Superchrome
7 Engineering Co., and its successors and/or predecessors, contributed manifested
8 waste to the BKK Class I Facility. This manifested waste contained Hazardous
9 Substances that Defendant Superchrome Engineering Co. generated and/or arranged
10 for its disposal at the BKK Class I Facility. To date, Defendant Superchrome
11 Engineering Co. has not incurred any costs at the BKK Class I Facility nor has it
12 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

13 698. According to historical BKK Corp. records, Defendant Superior
14 Industrial Pumping, and its successors and/or predecessors, contributed manifested
15 waste to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Superior Industrial Pumping generated and/or arranged
17 for its disposal at the BKK Class I Facility. To date, Defendant Superior Industrial
18 Pumping has not incurred any costs at the BKK Class I Facility nor has it paid its
19 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

20 699. According to historical BKK Corp. records, Defendant Superior
21 Pacific Galvanizing Co., and its successors and/or predecessors, contributed
22 manifested waste to the BKK Class I Facility. This manifested waste contained
23 Hazardous Substances that Defendant Superior Pacific Galvanizing Co. generated
24 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
25 Superior Pacific Galvanizing Co. has not incurred any costs at the BKK Class I
26 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
27 Class I Facility.

28

1 700. According to historical BKK Corp. records, Defendant Superior
2 Plating, and its successors and/or predecessors, contributed manifested waste to the
3 BKK Class I Facility. This manifested waste contained Hazardous Substances that
4 Defendant Superior Plating generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant Superior Plating has not incurred any costs at
6 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
7 Plaintiffs at the BKK Class I Facility.

8 701. According to historical BKK Corp. records, Defendant Synres
9 Chemical Corp., and its successors and/or predecessors, contributed manifested
10 waste to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant Synres Chemical Corp. generated and/or arranged for its
12 disposal at the BKK Class I Facility. To date, Defendant Synres Chemical Corp.
13 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
14 of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 702. According to historical BKK Corp. records, Defendant Systems
16 Furniture Co., and its successors and/or predecessors, contributed manifested waste
17 to the BKK Class I Facility. This manifested waste contained Hazardous
18 Substances that Defendant Systems Furniture Co. generated and/or arranged for its
19 disposal at the BKK Class I Facility. To date, Defendant Systems Furniture Co. has
20 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
21 costs incurred by the Plaintiffs at the BKK Class I Facility.

22 703. According to historical BKK Corp. records, Defendant T. P. Hearne
23 Co., and its successors and/or predecessors, contributed manifested waste to the
24 BKK Class I Facility. This manifested waste contained Hazardous Substances that
25 Defendant T. P. Hearne Co. generated and/or arranged for its disposal at the BKK
26 Class I Facility. To date, Defendant T. P. Hearne Co. has not incurred any costs at
27 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
28 Plaintiffs at the BKK Class I Facility.

1 704. According to historical BKK Corp. records, Defendant Tac Aluminum
2 Processing, and its successors and/or predecessors, contributed manifested waste to
3 the BKK Class I Facility. This manifested waste contained Hazardous Substances
4 that Defendant Tac Aluminum Processing generated and/or arranged for its disposal
5 at the BKK Class I Facility. To date, Defendant Tac Aluminum Processing has not
6 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
7 incurred by the Plaintiffs at the BKK Class I Facility.

8 705. According to historical BKK Corp. records, Defendant Target
9 Chemical Co., and its successors and/or predecessors, contributed manifested waste
10 to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant Target Chemical Co. generated and/or arranged for its
12 disposal at the BKK Class I Facility. To date, Defendant Target Chemical Co. has
13 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
14 costs incurred by the Plaintiffs at the BKK Class I Facility.

15 706. According to historical BKK Corp. records, Defendant Tarnutzer
16 Venture, and its successors and/or predecessors, contributed manifested waste to
17 the BKK Class I Facility. This manifested waste contained Hazardous Substances
18 that Defendant Tarnutzer Venture generated and/or arranged for its disposal at the
19 BKK Class I Facility. To date, Defendant Tarnutzer Venture has not incurred any
20 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
21 the Plaintiffs at the BKK Class I Facility.

22 707. According to historical BKK Corp. records, Defendant Teal Industries,
23 and its successors and/or predecessors, contributed manifested waste to the BKK
24 Class I Facility. This manifested waste contained Hazardous Substances that
25 Defendant Teal Industries generated and/or arranged for its disposal at the BKK
26 Class I Facility. To date, Defendant Teal Industries has not incurred any costs at the
27 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
28 at the BKK Class I Facility.

1 708. According to historical BKK Corp. records, Defendant Texas
2 Polymers, and its successors and/or predecessors, contributed manifested waste to
3 the BKK Class I Facility. This manifested waste contained Hazardous Substances
4 that Defendant Texas Polymers generated and/or arranged for its disposal at the
5 BKK Class I Facility. To date, Defendant Texas Polymers has not incurred any
6 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
7 the Plaintiffs at the BKK Class I Facility.

8 709. According to historical BKK Corp. records, Defendant Textile Rubber
9 & Chemical Co., and its successors and/or predecessors, contributed manifested
10 waste to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant Textile Rubber & Chemical Co. generated and/or
12 arranged for its disposal at the BKK Class I Facility. To date, Defendant Textile
13 Rubber & Chemical Co. has not incurred any costs at the BKK Class I Facility nor
14 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
15 Facility.

16 710. According to historical BKK Corp. records, Defendant Thatcher Glass,
17 and its successors and/or predecessors, contributed manifested waste to the BKK
18 Class I Facility. This manifested waste contained Hazardous Substances that
19 Defendant Thatcher Glass generated and/or arranged for its disposal at the BKK
20 Class I Facility. To date, Defendant Thatcher Glass has not incurred any costs at the
21 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
22 at the BKK Class I Facility.

23 711. According to historical BKK Corp. records, Defendant Thompson
24 Tank Construction, and its successors and/or predecessors, contributed manifested
25 waste to the BKK Class I Facility. This manifested waste contained Hazardous
26 Substances that Defendant Thompson Tank Construction generated and/or arranged
27 for its disposal at the BKK Class I Facility. To date, Defendant Thompson Tank
28

1 Construction has not incurred any costs at the BKK Class I Facility nor has it paid
2 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 712. According to historical BKK Corp. records, Defendant Textured
4 Coatings, and its successors and/or predecessors, contributed manifested waste to
5 the BKK Class I Facility. This manifested waste contained Hazardous Substances
6 that Defendant Textured Coatings generated and/or arranged for its disposal at the
7 BKK Class I Facility. To date, Defendant Textured Coatings has not incurred any
8 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
9 the Plaintiffs at the BKK Class I Facility.

10 713. According to historical BKK Corp. records, Defendant Thrifty Mart
11 Co., and its successors and/or predecessors, contributed manifested waste to the
12 BKK Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Thrifty Mart Co. generated and/or arranged for its disposal at the BKK
14 Class I Facility. To date, Defendant Thrifty Mart Co. has not incurred any costs at
15 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
16 Plaintiffs at the BKK Class I Facility.

17 714. According to historical BKK Corp. records, Defendant Thrifty Oil Co.,
18 and its successors and/or predecessors, contributed manifested waste to the BKK
19 Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Thrifty Oil Co. generated and/or arranged for its disposal at the BKK
21 Class I Facility. To date, Defendant Thrifty Oil Co. has not incurred any costs at the
22 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
23 at the BKK Class I Facility.

24 715. According to historical BKK Corp. records, Defendant Timco, and its
25 successors and/or predecessors, contributed manifested waste to the BKK Class I
26 Facility. This manifested waste contained Hazardous Substances that Defendant
27 Timco generated and/or arranged for its disposal at the BKK Class I Facility. To
28 date, Defendant Timco has not incurred any costs at the BKK Class I Facility nor

1 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
2 Facility.

3 716. According to historical BKK Corp. records, Defendant Titech
4 International Inc., and its successors and/or predecessors, contributed manifested
5 waste to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant Titech International Inc. generated and/or arranged for
7 its disposal at the BKK Class I Facility. To date, Defendant Titech International
8 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
9 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 717. According to historical BKK Corp. records, Defendant TMC
11 Properties LLC, and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant TMC Properties LLC generated and/or arranged for its
14 disposal at the BKK Class I Facility. To date, Defendant TMC Properties LLC has
15 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
16 costs incurred by the Plaintiffs at the BKK Class I Facility.

17 718. According to historical BKK Corp. records, Defendant Tool & Jig
18 Plating, and its successors and/or predecessors, contributed manifested waste to the
19 BKK Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Tool & Jig Plating generated and/or arranged for its disposal at the BKK
21 Class I Facility. To date, Defendant Tool & Jig Plating has not incurred any costs at
22 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
23 Plaintiffs at the BKK Class I Facility.

24 719. According to historical BKK Corp. records, Defendant Torrance
25 Business Park, and its successors and/or predecessors, contributed manifested waste
26 to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant Torrance Business Park generated and/or arranged for its
28 disposal at the BKK Class I Facility. To date, Defendant Torrance Business Park

1 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
2 of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 720. According to historical BKK Corp. records, Defendant Trans Harbor
4 Service, and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Trans Harbor Service generated and/or arranged for its disposal at the
7 BKK Class I Facility. To date, Defendant Trans Harbor Service has not incurred
8 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
9 by the Plaintiffs at the BKK Class I Facility.

10 721. According to historical BKK Corp. records, Defendant Trent Tube
11 Co., and its successors and/or predecessors, contributed manifested waste to the
12 BKK Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Trent Tube Co. generated and/or arranged for its disposal at the BKK
14 Class I Facility. To date, Defendant Trent Tube Co. has not incurred any costs at
15 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
16 Plaintiffs at the BKK Class I Facility.

17 722. According to historical BKK Corp. records, Defendant Trewax Co.,
18 and its successors and/or predecessors, contributed manifested waste to the BKK
19 Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Trewax Co. generated and/or arranged for its disposal at the BKK Class
21 I Facility. To date, Defendant Trewax Co. has not incurred any costs at the BKK
22 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
23 BKK Class I Facility.

24 723. According to historical BKK Corp. records, Defendant Tri-County
25 Insulation Co. Inc., and its successors and/or predecessors, contributed manifested
26 waste to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant Tri-County Insulation Co. Inc. generated and/or
28 arranged for its disposal at the BKK Class I Facility. To date, Defendant Tri-

1 County Insulation Co. Inc. has not incurred any costs at the BKK Class I Facility
2 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
3 Facility.

4 724. According to historical BKK Corp. records, Defendant Triad Marine &
5 Industrial Cleaning, and its successors and/or predecessors, contributed manifested
6 waste to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Triad Marine & Industrial Cleaning generated and/or
8 arranged for its disposal at the BKK Class I Facility. To date, Defendant Triad
9 Marine & Industrial Cleaning has not incurred any costs at the BKK Class I Facility
10 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
11 Facility.

12 725. According to historical BKK Corp. records, Defendant Trimm
13 Industries, and its successors and/or predecessors, contributed manifested waste to
14 the BKK Class I Facility. This manifested waste contained Hazardous Substances
15 that Defendant Trimm Industries generated and/or arranged for its disposal at the
16 BKK Class I Facility. To date, Defendant Trimm Industries has not incurred any
17 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
18 the Plaintiffs at the BKK Class I Facility.

19 726. Upon information and belief, Defendant Trimm Technologies, Inc. is
20 the successor to Defendant Trimm Industries and/or otherwise liable for manifested
21 waste that was contributed to the BKK Class I Facility by Defendant Trimm
22 Industries. According to historical BKK Corp. records, Defendant Trimm
23 Industries contributed manifested waste to the BKK Class I Facility. This
24 manifested waste contained Hazardous Substances that Defendant Trimm Industries
25 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
26 Defendant Trimm Technologies, Inc. has not incurred any costs at the BKK Class I
27 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
28 Class I Facility.

1 727. According to historical BKK Corp. records, Defendant Tubing Seal
2 Cap Co., and its successors and/or predecessors, contributed manifested waste to
3 the BKK Class I Facility. This manifested waste contained Hazardous Substances
4 that Defendant Tubing Seal Cap Co. generated and/or arranged for its disposal at
5 the BKK Class I Facility. To date, Defendant Tubing Seal Cap Co. has not incurred
6 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
7 by the Plaintiffs at the BKK Class I Facility.

8 728. According to historical BKK Corp. records, Defendant U.S.
9 Prefinished Metals, and its successors and/or predecessors, contributed manifested
10 waste to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant U.S. Prefinished Metals generated and/or arranged for
12 its disposal at the BKK Class I Facility. To date, Defendant U.S. Prefinished Metals
13 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
14 of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 729. According to historical BKK Corp. records, Defendant Union
16 Manufacturing Co., and its successors and/or predecessors, contributed manifested
17 waste to the BKK Class I Facility. This manifested waste contained Hazardous
18 Substances that Defendant Union Manufacturing Co. generated and/or arranged for
19 its disposal at the BKK Class I Facility. To date, Defendant Union Manufacturing
20 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
21 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

22 730. According to historical BKK Corp. records, Defendant Union Packing,
23 and its successors and/or predecessors, contributed manifested waste to the BKK
24 Class I Facility. This manifested waste contained Hazardous Substances that
25 Defendant Union Packing generated and/or arranged for its disposal at the BKK
26 Class I Facility. To date, Defendant Union Packing has not incurred any costs at the
27 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
28 at the BKK Class I Facility.

1 731. According to historical BKK Corp. records, Defendant Union Tribune
2 Publishing Co., and its successors and/or predecessors, contributed manifested
3 waste to the BKK Class I Facility. This manifested waste contained Hazardous
4 Substances that Defendant Union Tribune Publishing Co. generated and/or arranged
5 for its disposal at the BKK Class I Facility. To date, Defendant Union Tribune
6 Publishing Co. has not incurred any costs at the BKK Class I Facility nor has it paid
7 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

8 732. According to historical BKK Corp. records, Defendant Unitog Rental
9 Services Inc., and its successors and/or predecessors, contributed manifested waste
10 to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Defendant Unitog Rental Services Inc. generated and/or arranged
12 for its disposal at the BKK Class I Facility. To date, Defendant Unitog Rental
13 Services Inc. has not incurred any costs at the BKK Class I Facility nor has it paid
14 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 733. According to historical BKK Corp. records, Defendant Universal
16 Circuits Inc., and its successors and/or predecessors, contributed manifested waste
17 to the BKK Class I Facility. This manifested waste contained Hazardous
18 Substances that Defendant Universal Circuits Inc. generated and/or arranged for its
19 disposal at the BKK Class I Facility. To date, Defendant Universal Circuits Inc. has
20 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
21 costs incurred by the Plaintiffs at the BKK Class I Facility.

22 734. Upon information and belief, Defendant Universal Molding Company
23 is the successor to Defendant Glass Arts and/or otherwise liable for manifested
24 waste that was contributed to the BKK Class I Facility by Defendant Glass Arts.
25 According to historical BKK Corp. records, Defendant Glass Arts contributed
26 manifested waste to the BKK Class I Facility. This manifested waste contained
27 Hazardous Substances that Defendant Glass Arts generated and/or arranged for its
28 disposal at the BKK Class I Facility. To date, Defendant Universal Molding

1 Company has not incurred any costs at the BKK Class I Facility nor has it paid its
2 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 735. According to historical BKK Corp. records, Defendant Universal Paint
4 Corp., and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Universal Paint Corp. generated and/or arranged for its disposal at the
7 BKK Class I Facility. To date, Defendant Universal Paint Corp. has not incurred
8 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
9 by the Plaintiffs at the BKK Class I Facility.

10 736. According to historical BKK Corp. records, Defendant USA
11 Petroleum, and its successors and/or predecessors, contributed manifested waste to
12 the BKK Class I Facility. This manifested waste contained Hazardous Substances
13 that Defendant USA Petroleum generated and/or arranged for its disposal at the
14 BKK Class I Facility. To date, Defendant USA Petroleum has not incurred any
15 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
16 the Plaintiffs at the BKK Class I Facility.

17 737. According to historical BKK Corp. records, Defendant V&M
18 Precision Grinding, and its successors and/or predecessors, contributed manifested
19 waste to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Defendant V&M Precision Grinding generated and/or arranged for
21 its disposal at the BKK Class I Facility. To date, Defendant V&M Precision
22 Grinding has not incurred any costs at the BKK Class I Facility nor has it paid its
23 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 738. According to historical BKK Corp. records, Defendant Val Circuits
25 Inc., and its successors and/or predecessors, contributed manifested waste to the
26 BKK Class I Facility. This manifested waste contained Hazardous Substances that
27 Defendant Val Circuits Inc. generated and/or arranged for its disposal at the BKK
28 Class I Facility. To date, Defendant Val Circuits Inc. has not incurred any costs at

1 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
2 Plaintiffs at the BKK Class I Facility.

3 739. According to historical BKK Corp. records, Defendant Valley Brake
4 Bond Co. Inc., and its successors and/or predecessors, contributed manifested waste
5 to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant Valley Brake Bond Co. Inc. generated and/or arranged
7 for its disposal at the BKK Class I Facility. To date, Defendant Valley Brake Bond
8 Co. Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its
9 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 740. According to historical BKK Corp. records, Defendant Valley Friction
11 Materials, and its successors and/or predecessors, contributed manifested waste to
12 the BKK Class I Facility. This manifested waste contained Hazardous Substances
13 that Defendant Valley Friction Materials generated and/or arranged for its disposal
14 at the BKK Class I Facility. To date, Defendant Valley Friction Materials has not
15 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
16 incurred by the Plaintiffs at the BKK Class I Facility.

17 741. According to historical BKK Corp. records, Defendant Van Der Horst
18 Corp., and its successors and/or predecessors, contributed manifested waste to the
19 BKK Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Van Der Horst Corp. generated and/or arranged for its disposal at the
21 BKK Class I Facility. To date, Defendant Van Der Horst Corp. has not incurred any
22 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
23 the Plaintiffs at the BKK Class I Facility.

24 742. According to historical BKK Corp. records, Defendant Vernon Leather
25 Co., and its successors and/or predecessors, contributed manifested waste to the
26 BKK Class I Facility. This manifested waste contained Hazardous Substances that
27 Defendant Vernon Leather Co. generated and/or arranged for its disposal at the
28 BKK Class I Facility. To date, Defendant Vernon Leather Co. has not incurred any

1 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
2 the Plaintiffs at the BKK Class I Facility.

3 743. According to historical BKK Corp. records, Defendant Visitron Corp.,
4 and its successors and/or predecessors, contributed manifested waste to the BKK
5 Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Visitron Corp. generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant Visitron Corp. has not incurred any costs at the
8 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
9 at the BKK Class I Facility.

10 744. According to historical BKK Corp. records, Defendant Voi Shan, and
11 its successors and/or predecessors, contributed manifested waste to the BKK Class I
12 Facility. This manifested waste contained Hazardous Substances that Defendant
13 Voi Shan generated and/or arranged for its disposal at the BKK Class I Facility. To
14 date, Defendant Voi Shan has not incurred any costs at the BKK Class I Facility nor
15 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
16 Facility.

17 745. According to historical BKK Corp. records, Defendant W. L.
18 Chapman Co., and its successors and/or predecessors, contributed manifested waste
19 to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Defendant W. L. Chapman Co. generated and/or arranged for its
21 disposal at the BKK Class I Facility. To date, Defendant W. L. Chapman Co. has
22 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
23 costs incurred by the Plaintiffs at the BKK Class I Facility.

24 746. According to historical BKK Corp. records, Defendant W. S. Hatch
25 Co., and its successors and/or predecessors, contributed manifested waste to the
26 BKK Class I Facility. This manifested waste contained Hazardous Substances that
27 Defendant W. S. Hatch Co. generated and/or arranged for its disposal at the BKK
28 Class I Facility. To date, Defendant W. S. Hatch Co. has not incurred any costs at

1 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
2 Plaintiffs at the BKK Class I Facility.

3 747. According to historical BKK Corp. records, Defendant W. W. Irwin
4 Co., and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant W. W. Irwin Co. generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant W. W. Irwin Co. has not incurred any costs at
8 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
9 Plaintiffs at the BKK Class I Facility.

10 748. According to historical BKK Corp. records, Defendant Warners Dead
11 Stock, and its successors and/or predecessors, contributed manifested waste to the
12 BKK Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Warners Dead Stock generated and/or arranged for its disposal at the
14 BKK Class I Facility. To date, Defendant Warners Dead Stock has not incurred any
15 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
16 the Plaintiffs at the BKK Class I Facility.

17 749. According to historical BKK Corp. records, Defendant Waterfront
18 Services, and its successors and/or predecessors, contributed manifested waste to
19 the BKK Class I Facility. This manifested waste contained Hazardous Substances
20 that Defendant Waterfront Services generated and/or arranged for its disposal at the
21 BKK Class I Facility. To date, Defendant Waterfront Services has not incurred any
22 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
23 the Plaintiffs at the BKK Class I Facility.

24 750. According to historical BKK Corp. records, Defendant Waymire Drum
25 Co. Inc., and its successors and/or predecessors, contributed manifested waste to the
26 BKK Class I Facility. This manifested waste contained Hazardous Substances that
27 Defendant Waymire Drum Co. Inc. generated and/or arranged for its disposal at the
28 BKK Class I Facility. To date, Defendant Waymire Drum Co. Inc. has not incurred

1 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
2 by the Plaintiffs at the BKK Class I Facility.

3 751. According to historical BKK Corp. records, Defendant Weber Metals
4 Inc., and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Weber Metals Inc. generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant Weber Metals Inc. has not incurred any costs at
8 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
9 Plaintiffs at the BKK Class I Facility.

10 752. According to historical BKK Corp. records, Defendant Well Tech Inc.,
11 and its successors and/or predecessors, contributed manifested waste to the BKK
12 Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Well Tech Inc. generated and/or arranged for its disposal at the BKK
14 Class I Facility. To date, Defendant Well Tech Inc. has not incurred any costs at the
15 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
16 at the BKK Class I Facility.

17 753. According to historical BKK Corp. records, Defendant Wescal
18 Industries, and its successors and/or predecessors, contributed manifested waste to
19 the BKK Class I Facility. This manifested waste contained Hazardous Substances
20 that Defendant Wescal Industries generated and/or arranged for its disposal at the
21 BKK Class I Facility. To date, Defendant Wescal Industries has not incurred any
22 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
23 the Plaintiffs at the BKK Class I Facility.

24 754. According to historical BKK Corp. records, Defendant West American
25 Rubber, and its successors and/or predecessors, contributed manifested waste to the
26 BKK Class I Facility. This manifested waste contained Hazardous Substances that
27 Defendant West American Rubber generated and/or arranged for its disposal at the
28 BKK Class I Facility. To date, Defendant West American Rubber has not incurred

1 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
2 by the Plaintiffs at the BKK Class I Facility.

3 755. According to historical BKK Corp. records, Defendant Western
4 Circuits, and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Western Circuits generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant Western Circuits has not incurred any costs at
8 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
9 Plaintiffs at the BKK Class I Facility.

10 756. According to historical BKK Corp. records, Defendant Western
11 Dyeing & Finishing, and its successors and/or predecessors, contributed manifested
12 waste to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Defendant Western Dyeing & Finishing generated and/or arranged
14 for its disposal at the BKK Class I Facility. To date, Defendant Western Dyeing &
15 Finishing has not incurred any costs at the BKK Class I Facility nor has it paid its
16 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

17 757. According to historical BKK Corp. records, Defendant Western
18 Electroplating Inc., and its successors and/or predecessors, contributed manifested
19 waste to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Defendant Western Electroplating Inc. generated and/or arranged
21 for its disposal at the BKK Class I Facility. To date, Defendant Western
22 Electroplating Inc. has not incurred any costs at the BKK Class I Facility nor has it
23 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 758. According to historical BKK Corp. records, Defendant Western
25 Galvanizing Co., and its successors and/or predecessors, contributed manifested
26 waste to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant Western Galvanizing Co. generated and/or arranged for
28 its disposal at the BKK Class I Facility. To date, Defendant Western Galvanizing

1 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
2 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 759. Upon information and belief, Defendant Western Metals Corp. is the
4 successor to Defendant Rex Precision Products Inc. and/or otherwise liable for
5 manifested waste that was contributed to the BKK Class I Facility by Defendant
6 Rex Precision Products Inc. According to historical BKK Corp. records, Defendant
7 Rex Precision Products Inc. contributed manifested waste to the BKK Class I
8 Facility. This manifested waste contained Hazardous Substances that Defendant
9 Rex Precision Products Inc. generated and/or arranged for its disposal at the BKK
10 Class I Facility. To date, Defendant Western Metals Corp. has not incurred any
11 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
12 the Plaintiffs at the BKK Class I Facility.

13 760. According to historical BKK Corp. records, Defendant Western Oil &
14 Refining Co. Inc., and its successors and/or predecessors, contributed manifested
15 waste to the BKK Class I Facility. This manifested waste contained Hazardous
16 Substances that Defendant Western Oil & Refining Co. Inc. generated and/or
17 arranged for its disposal at the BKK Class I Facility. To date, Defendant Western
18 Oil & Refining Co. Inc. has not incurred any costs at the BKK Class I Facility nor
19 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
20 Facility.

21 761. According to historical BKK Corp. records, Defendant Western
22 Rebuilder Inc., and its successors and/or predecessors, contributed manifested
23 waste to the BKK Class I Facility. This manifested waste contained Hazardous
24 Substances that Defendant Western Rebuilder Inc. generated and/or arranged for its
25 disposal at the BKK Class I Facility. To date, Defendant Western Rebuilder Inc.
26 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
27 of costs incurred by the Plaintiffs at the BKK Class I Facility.

28

1 762. According to historical BKK Corp. records, Defendant Western
2 Specialty Coatings Co., and its successors and/or predecessors, contributed
3 manifested waste to the BKK Class I Facility. This manifested waste contained
4 Hazardous Substances that Defendant Western Specialty Coatings Co. generated
5 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
6 Western Specialty Coatings Co. has not incurred any costs at the BKK Class I
7 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
8 Class I Facility.

9 763. According to historical BKK Corp. records, Defendant Western States
10 Refining, and its successors and/or predecessors, contributed manifested waste to
11 the BKK Class I Facility. This manifested waste contained Hazardous Substances
12 that Defendant Western States Refining generated and/or arranged for its disposal at
13 the BKK Class I Facility. To date, Defendant Western States Refining has not
14 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
15 incurred by the Plaintiffs at the BKK Class I Facility.

16 764. According to historical BKK Corp. records, Defendant Western Wheel
17 Manufacturing Co., and its successors and/or predecessors, contributed manifested
18 waste to the BKK Class I Facility. This manifested waste contained Hazardous
19 Substances that Defendant Western Wheel Manufacturing Co. generated and/or
20 arranged for its disposal at the BKK Class I Facility. To date, Defendant Western
21 Wheel Manufacturing Co. has not incurred any costs at the BKK Class I Facility
22 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
23 Facility.

24 765. According to historical BKK Corp. records, Defendant Westway
25 Terminal Co. Inc., and its successors and/or predecessors, contributed manifested
26 waste to the BKK Class I Facility. This manifested waste contained Hazardous
27 Substances that Defendant Westway Terminal Co. Inc. generated and/or arranged
28 for its disposal at the BKK Class I Facility. To date, Defendant Westway Terminal

1 Co. Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its
2 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 766. According to historical BKK Corp. records, Defendant Wheel Service
4 Group Inc., and its successors and/or predecessors, contributed manifested waste to
5 the BKK Class I Facility. This manifested waste contained Hazardous Substances
6 that Defendant Wheel Service Group Inc. generated and/or arranged for its disposal
7 at the BKK Class I Facility. To date, Defendant Wheel Service Group Inc. has not
8 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
9 incurred by the Plaintiffs at the BKK Class I Facility.

10 767. According to historical BKK Corp. records, Defendant Whitcomb
11 Plating Inc., and its successors and/or predecessors, contributed manifested waste to
12 the BKK Class I Facility. This manifested waste contained Hazardous Substances
13 that Defendant Whitcomb Plating Inc. generated and/or arranged for its disposal at
14 the BKK Class I Facility. To date, Defendant Whitcomb Plating Inc. has not
15 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
16 incurred by the Plaintiffs at the BKK Class I Facility.

17 768. According to historical BKK Corp. records, Defendant Whitworth
18 Inc., and its successors and/or predecessors, contributed manifested waste to the
19 BKK Class I Facility. This manifested waste contained Hazardous Substances that
20 Defendant Whitworth Inc. generated and/or arranged for its disposal at the BKK
21 Class I Facility. To date, Defendant Whitworth Inc. has not incurred any costs at
22 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
23 Plaintiffs at the BKK Class I Facility.

24 769. According to historical BKK Corp. records, Defendant Whitfield Tank
25 Lines, and its successors and/or predecessors, contributed manifested waste to the
26 BKK Class I Facility. This manifested waste contained Hazardous Substances that
27 Defendant Whitfield Tank Lines generated and/or arranged for its disposal at the
28 BKK Class I Facility. To date, Defendant Whitfield Tank Lines has not incurred

1 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
2 by the Plaintiffs at the BKK Class I Facility.

3 770. According to historical BKK Corp. records, Defendant Whittier
4 Chrome & Plating, and its successors and/or predecessors, contributed manifested
5 waste to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Defendant Whittier Chrome & Plating generated and/or arranged
7 for its disposal at the BKK Class I Facility. To date, Defendant Whittier Chrome &
8 Plating has not incurred any costs at the BKK Class I Facility nor has it paid its fair
9 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 771. According to historical BKK Corp. records, Defendant Wilcor Inc.,
11 and its successors and/or predecessors, contributed manifested waste to the BKK
12 Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Wilcor Inc. generated and/or arranged for its disposal at the BKK Class I
14 Facility. To date, Defendant Wilcor Inc. has not incurred any costs at the BKK
15 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
16 BKK Class I Facility.

17 772. According to historical BKK Corp. records, Defendant Wilmington
18 Liquid Bulk, and its successors and/or predecessors, contributed manifested waste
19 to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Defendant Wilmington Liquid Bulk generated and/or arranged for
21 its disposal at the BKK Class I Facility. To date, Defendant Wilmington Liquid
22 Bulk has not incurred any costs at the BKK Class I Facility nor has it paid its fair
23 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 773. According to historical BKK Corp. records, Defendant Wilshire
25 Industries, and its successors and/or predecessors, contributed manifested waste to
26 the BKK Class I Facility. This manifested waste contained Hazardous Substances
27 that Defendant Wilshire Industries generated and/or arranged for its disposal at the
28 BKK Class I Facility. To date, Defendant Wilshire Industries has not incurred any

1 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
2 the Plaintiffs at the BKK Class I Facility.

3 774. According to historical BKK Corp. records, Defendant Winchester
4 Inn, and its successors and/or predecessors, contributed manifested waste to the
5 BKK Class I Facility. This manifested waste contained Hazardous Substances that
6 Defendant Winchester Inn generated and/or arranged for its disposal at the BKK
7 Class I Facility. To date, Defendant Winchester Inn has not incurred any costs at
8 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
9 Plaintiffs at the BKK Class I Facility.

10 775. According to historical BKK Corp. records, Defendant Winonics Inc.,
11 and its successors and/or predecessors, contributed manifested waste to the BKK
12 Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Winonics Inc. generated and/or arranged for its disposal at the BKK
14 Class I Facility. To date, Defendant Winonics Inc. has not incurred any costs at the
15 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
16 at the BKK Class I Facility.

17 776. According to historical BKK Corp. records, Defendant Wyndham
18 Manufacturing Co. Inc., and its successors and/or predecessors, contributed
19 manifested waste to the BKK Class I Facility. This manifested waste contained
20 Hazardous Substances that Defendant Wyndham Manufacturing Co. Inc. generated
21 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
22 Wyndham Manufacturing Co. Inc. has not incurred any costs at the BKK Class I
23 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
24 Class I Facility.

25 777. According to historical BKK Corp. records, Defendant Xidex Corp.,
26 and its successors and/or predecessors, contributed manifested waste to the BKK
27 Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Xidex Corp. generated and/or arranged for its disposal at the BKK Class

1 I Facility. To date, Defendant Xidex Corp. has not incurred any costs at the BKK
2 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
3 BKK Class I Facility.

4 778. According to historical BKK Corp. records, Defendant Zapata
5 Construction Inc., and its successors and/or predecessors, contributed manifested
6 waste to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Defendant Zapata Construction Inc. generated and/or arranged for
8 its disposal at the BKK Class I Facility. To date, Defendant Zapata Construction
9 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
10 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

11 779. According to historical BKK Corp. records, Defendant Zero Corp., and
12 its successors and/or predecessors, contributed manifested waste to the BKK Class I
13 Facility. This manifested waste contained Hazardous Substances that Defendant
14 Zero Corp. generated and/or arranged for its disposal at the BKK Class I Facility.
15 To date, Defendant Zero Corp. has not incurred any costs at the BKK Class I
16 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
17 Class I Facility.

18 780. According to historical BKK Corp. records, Defendant Zolatone
19 Process Inc., and its successors and/or predecessors, contributed manifested waste
20 to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Defendant Zolatone Process Inc. generated and/or arranged for its
22 disposal at the BKK Class I Facility. To date, Defendant Zolatone Process Inc. has
23 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
24 costs incurred by the Plaintiffs at the BKK Class I Facility.

25 781. According to historical BKK Corp. records, Defendant Zonver
26 Drilling, and its successors and/or predecessors, contributed manifested waste to the
27 BKK Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Zonver Drilling generated and/or arranged for its disposal at the BKK

1 Class I Facility. To date, Defendant Zonver Drilling has not incurred any costs at
2 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
3 Plaintiffs at the BKK Class I Facility.

4 782. According to historical BKK Corp. records, Defendant City of
5 Baldwin Park contributed both municipal waste and manifested waste to the BKK
6 Class I Facility. This manifested waste contained Hazardous Substances that City of
7 Baldwin Park generated and/or arranged for its disposal at the BKK Class I Facility.
8 To date, City of Baldwin Park has not incurred any costs at the BKK Class I
9 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
10 Class I Facility.

11 783. According to historical BKK Corp. records, City of Fontana
12 contributed both municipal waste and manifested waste to the BKK Class I Facility.
13 This manifested waste contained Hazardous Substances that City of Fontana
14 generated and/or arranged for its disposal at the BKK Class I Facility. To date, City
15 of Fontana has not incurred any costs at the BKK Class I Facility nor has it paid its
16 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

17 784. According to historical BKK Corp. records, City of Gardena
18 contributed both municipal waste and manifested waste to the BKK Class I Facility.
19 This manifested waste contained Hazardous Substances that City of Gardena
20 generated and/or arranged for its disposal at the BKK Class I Facility. To date, City
21 of Gardena has not incurred any costs at the BKK Class I Facility nor has it paid its
22 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 785. According to historical BKK Corp. records, City of Pomona
24 contributed both municipal waste and manifested waste to the BKK Class I Facility.
25 This manifested waste contained Hazardous Substances that City of Pomona
26 generated and/or arranged for its disposal at the BKK Class I Facility. To date, City
27 of Pomona has not incurred any costs at the BKK Class I Facility nor has it paid its
28 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 786. According to historical BKK Corp. records, City of Whittier
2 contributed both municipal waste and manifested waste to the BKK Class I Facility.
3 This manifested waste contained Hazardous Substances that City of Whittier
4 generated and/or arranged for its disposal at the BKK Class I Facility. To date, City
5 of Whittier has not incurred any costs at the BKK Class I Facility nor has it paid its
6 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

7 787. Each Defendant has declined or not responded to Plaintiffs' request(s)
8 to enter into, or has otherwise not entered into, a tolling agreement to facilitate
9 settlement discussions. A number of other PRPs at the BKK Class I Facility have
10 entered into tolling agreements with the Plaintiffs, and Plaintiffs will attempt to
11 resolve the liabilities of those PRPs without litigation.

12 788. On information and belief, each Defendant, including any of its
13 assignees, predecessors, successors in interest, or alter egos, is a "person" who
14 either (a) by contract, agreement, or otherwise, arranged for disposal or treatment,
15 or (b) arranged with a transporter for disposal or treatment, of Hazardous
16 Substances at the BKK Class I Facility.

17 789. On information and belief, between approximately 1969 and 1987,
18 Does 1-10 disposed or arranged for the disposal of Hazardous Substances at the
19 BKK Class I Facility but have not incurred any costs, nor have they paid their fair
20 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

21 **FACTUAL ALLEGATIONS COMMON TO ALL CLAIMS**

22 790. At all times relevant to this action, the BKK Class I Facility was
23 operated by BKK Corporation ("BKK Corp.") and/or other third parties and was
24 also owned by BKK Corp. from approximately 1973 through the present.

25 791. Beginning in at least 1969 and continuing to approximately 1984, the
26 BKK Class I Facility accepted manifested waste, which included Hazardous
27 Substances, for disposal. After 1984, the BKK Class I Facility continued accepting
28 municipal waste, including asbestos.

1 792. The BKK Class I Facility ceased accepting waste in 1987, at which
2 time BKK Corp. began to undertake landfill closure and post-closure activities.

3 793. By letters dated October 18 and October 20, 2004, “BKK [Corp.]
4 notified DTSC that for financial reasons, BKK [Corp.] would no longer be able to
5 perform required post-closure care of the [BKK Class I Facility], including
6 operation of the LTP, after November 17, 2004. As a result, DTSC . . . hired a
7 contractor to conduct emergency response activities at the [BKK Class I Facility].”
8 Imminent and Substantial Endangerment Determination and Order and Remedial
9 Action Order Docket No. I/SE-D 04/05-004 (“ISE Order”), 14.

10 794. On December 2, 2004, DTSC issued the ISE Order to BKK Corp. and
11 50 other respondents who were alleged to have “arranged by contract, agreement or
12 otherwise for the disposal of [their] disposed hazardous substances/wastes” at the
13 BKK Class I Facility, or who were alleged to be an “owner and operator” of the
14 BKK Class I Facility. A true and correct copy of the ISE Order is attached hereto
15 as **Exhibit B**.

16 795. In the ISE Order, DTSC asserts that “[t]here has been a ‘release’
17 and/or there is a ‘threatened release’ of hazardous substances” at the BKK Class I
18 Facility.

19 796. The ISE Order required the recipients of the order to perform certain
20 specified environmental response actions and to reimburse DTSC for the response
21 actions it had taken at the BKK Class I Facility.

22 797. In 2004, certain recipients of the ISE Order formed the BKK Working
23 Group for the purpose of cooperating with DTSC to address conditions at the BKK
24 Class I Facility. Immediately thereafter, the BKK Working Group and DTSC
25 commenced negotiations to seek a settlement to address conditions at the BKK
26 Class I Facility. Prior to finalizing this settlement, the BKK Working Group and
27 each of its then-members incurred necessary response costs at the BKK Class I
28 Facility that are consistent with the NCP.

1 798. The composition of the BKK Working Group has changed over time
2 and continues to change. New members pay an interim allocated share of past and
3 ongoing costs. Each Plaintiff, as a member of the BKK Working Group, has
4 incurred necessary response costs consistent with the NCP.

5 799. On October 31, 2005, the State of California, through its agency
6 DTSC, filed a Complaint against certain members of the BKK Working Group in
7 case number CV 05-7746 CAS (JWJx) (C.D. Cal. 2005) (hereinafter “Initial Site
8 Action”). In the Initial Site Action Complaint, the State of California sought
9 recovery of past response costs pursuant to Section 107 of CERCLA; declaratory
10 relief pursuant to Section 113 of CERCLA; and injunctive relief pursuant to CAL.
11 HEALTH & SAFETY CODE § 25358.3(e) from certain members of the BKK Working
12 Group relating to the BKK Class I Facility. The Initial Site Action Complaint was
13 filed concurrently with the lodging of a consent decree between certain members of
14 the BKK Working Group and DTSC that addressed conditions at the BKK Class I
15 Facility.

16 800. On February 8, 2006, the State of California, through its agency
17 DTSC, lodged an Amended Consent Decree (“First Consent Decree”) in the Initial
18 Site Action. The First Consent Decree, attached hereto as **Exhibit C**, was entered
19 on March 9, 2006.

20 801. Among other things, the First Consent Decree obligated certain
21 members of the BKK Working Group to perform environmental response actions at
22 the BKK Class I Facility, to reimburse DTSC for certain of its past response costs,
23 and to pay DTSC for its continuing oversight of the environmental response work
24 at the BKK Class I Facility. The response actions have included investigation
25 activities.

26 802. The First Consent Decree also “resolves the liability of [the members
27 of the BKK Working Group] for Past Response Costs . . .” and provides members
28 of the BKK Working Group with “protection from contribution actions or claims as

1 provided by CERCLA Section 113(f)(2), 42 U.S.C. § 9613(f)(2) for matters
2 addressed in [the First Consent Decree]. The matters addressed in [the First
3 Consent Decree] are (a) the Work to be Performed by [the BKK Working Group] . .
4 . (b) Past Response Costs; (c) Future Interim Response Costs; (d) Future DTSC
5 Oversight Costs; (e) interest on amounts referred to in (b), (c), and (d) above, and
6 (f) compliance with the ISE Order from its effective date through the date on which
7 it is dismissed as provided in [the First Consent Decree].” First Consent Decree at
8 ¶ 8.1.

9 803. Upon entry of the First Consent Decree, the BKK Working Group
10 began performing environmental response work, including site investigation, at the
11 BKK Class I Facility under the oversight of DTSC. All work performed under the
12 First Consent Decree is deemed to be, and was, necessary and performed in
13 accordance with the NCP.

14 804. On May 5, 2010, the State of California, through its agency DTSC,
15 filed a second complaint against certain members of the BKK Working Group in
16 case number CV 10-3378 RGK (AJWx) (C.D. Cal. 2010) (hereinafter “Second Site
17 Action”). Like the Initial Site Action Complaint, the Second Site Action Complaint
18 sought recovery of past response costs, including investigation costs, pursuant to
19 Section 107 of CERCLA; declaratory relief pursuant to Section 113 of CERCLA;
20 and injunctive relief pursuant to Cal. Health & Safety Code § 25358.3(e) from
21 certain members of the BKK Working Group relating to the BKK Class I Facility.

22 805. At that same time, the State of California, through its agency DTSC,
23 lodged a Second Consent Decree (“Second Consent Decree”) with the Court,
24 obligating the BKK Working Group to perform additional response actions,
25 including investigation activities, at the BKK Class I Facility, to reimburse DTSC
26 for certain of its past response costs, including investigation costs, and to pay future
27 oversight costs to DTSC on an ongoing basis. The Second Consent Decree,
28 attached hereto as **Exhibit D**, was entered on August 10, 2010.

1 806. Among other things, the Second Consent Decree obligates certain
2 members of the BKK Working Group to perform environmental response actions,
3 including investigation activities, at the BKK Class I Facility, to reimburse DTSC
4 for certain of its response costs, including investigation costs, to pay DTSC for its
5 continuing oversight of the environmental response work at the BKK Class I
6 Facility, and to conduct an Engineering Evaluation/Cost Analysis (“EE/CA”) of the
7 BKK Class I Facility. Second Consent Decree at ¶ 4.1.2 and Ex. D (EE/CA
8 Statement of Work). The EE/CA is to propose a non-time critical removal action
9 that contributes to the efficient performance of any long-term remedial action for
10 the BKK Class I Facility. It is anticipated that a remedial investigation/feasibility
11 study and remedial actions will be conducted at the BKK Class I Facility at the
12 conclusion of the EE/CA. It is anticipated that DTSC will select further appropriate
13 response actions to be performed at the BKK Class Facility based on the EE/CA.

14 807. Among other things, the Second Consent Decree provides certain
15 members of the BKK Working Group with “protection from contribution actions or
16 claims as provided by CERCLA Section 113(f)(2), 42 U.S.C. § 9613(f)(2) for
17 matters addressed in the Second Consent Decree. The matters addressed in the
18 Second Consent Decree are (a) the Work to be Performed by [the BKK Working
19 Group] . . . (b) Past Response Costs . . .; and (c) Future DTSC Oversight Costs . . .
20 .” Second Consent Decree at ¶ 8.1.

21 808. From August 10, 2010 until the present, the BKK Working Group
22 performed and continues to perform environmental response work, including site
23 investigation, at the BKK Class I Facility under the Second Consent Decree. All
24 work performed under the Second Consent Decree is deemed to be, and was,
25 necessary and performed in accordance with the NCP.

26 809. On February 2, 2015, the State of California, through its agency
27 DTSC, filed a third complaint against certain members of the BKK Working Group
28 in case number CV 15-729 DDP (AJWx) (C.D. Cal. 2015) (hereinafter “Third Site

1 Action”). Like the Initial and Second Site Action Complaints, the Third Site
2 Action Complaint sought recovery of past response costs pursuant to Section 107 of
3 CERCLA; declaratory relief pursuant to Section 113 of CERCLA; and injunctive
4 relief pursuant to Cal. Health & Safety Code § 25358.3(e) from certain members of
5 the BKK Working Group relating to the BKK Class I Facility.

6 810. At that same time, the State of California, through its agency DTSC,
7 lodged a Third Partial Consent Decree (“Third Partial Consent Decree”) with the
8 Court, obligating certain members of the BKK Working Group to perform
9 additional response actions, including investigation activities, at the BKK Class I
10 Facility, to reimburse DTSC for certain of its past response costs, including site
11 investigation activities, and to pay future oversight costs to DTSC on an ongoing
12 basis. The Third Partial Consent Decree, attached hereto as **Exhibit E**, was entered
13 on July 24, 2015.

14 811. Among other things, the Third Partial Consent Decree obligates certain
15 members of the BKK Working Group to perform environmental response actions,
16 including investigation activities, at the BKK Class I Facility, to reimburse DTSC
17 for certain of its response costs, including site investigation costs, to pay DTSC for
18 its continuing oversight of the environmental response work at the BKK Class I
19 Facility, and to conduct a Remedial Investigation/Feasibility Study (“RI/FS”) for
20 the groundwater beneath and around the BKK Class I Facility. Third Partial
21 Consent Decree at ¶ 4.1.3 and Exhibit D to the Third Partial Consent Decree (RI/FS
22 Statement of Work). The area of groundwater investigation pursuant to the RI/FS
23 includes the Class I Landfill and Class I Landfill operation areas, including but not
24 limited to, “Trash Island” located on the north side of the landfill; the leachate
25 treatment plant (LTP); Barrier 1; the upper detention basin below the LTP; liquid
26 piping and other liquid collection and conveyance systems associated with the
27 Class I Landfill; the fueling station and truck wash; and wherever hazardous
28 substances from such areas have or may come to be located. It is anticipated that

1 DTSC will select further appropriate response actions to be performed at and
2 around the BKK Class I Facility based on the RI/FS.

3 812. Among other things, the Third Partial Consent Decree provides certain
4 members of the BKK Working Group with “protection from contribution actions or
5 claims as provided by CERCLA Section 113(f)(2), 42 U.S.C. § 9613(f)(2) for
6 matters addressed in the Third Partial Consent Decree. The matters addressed in
7 the Third Partial Consent Decree are (a) the Work to be Performed by [members of
8 the BKK Working Group] . . . (b) Past Response Costs . . . ; and (c) Future DTSC
9 Oversight Costs . . .” Third Partial Consent Decree at ¶ 8.1.

10 813. As reflected in the BKK document archive maintained by DTSC,
11 members of the BKK Working Group also entered into additional interim
12 settlement agreements with DTSC to reimburse the State for its past response costs
13 incurred consistent with the NCP at the BKK Class I Landfill.

14 814. On July 29, 2016, the State of California, through its agency DTSC,
15 filed an amended third complaint, which joined as defendants five additional
16 members of the BKK Working Group.

17 815. At that same time, the State of California, through its agency DTSC,
18 lodged a First Amended Third Partial Consent Decree (“Amended Third Partial
19 Consent Decree”), which added the five new defendants as additional Settling
20 Defendants. The Amended Third Partial Consent Decree, attached hereto as
21 **Exhibit F**, was approved by the Court on October 18, 2016.

22 816. Among other things, the Amended Third Partial Consent Decree, like
23 the Third Partial Consent Decree, obligates certain members of the BKK Working
24 Group to perform environmental response actions at the BKK Class I Facility, to
25 reimburse DTSC for certain of its response costs, to pay DTSC for its continuing
26 oversight of the environmental response work at the BKK Class I Facility, and to
27 conduct a Remedial Investigation/Feasibility Study (“RI/FS”) for the groundwater
28

1 beneath and around the BKK Class I Facility. Amended Third Partial Consent
2 Decree at ¶ 4.1.3.

3 817. From July 24, 2015 until the present, the BKK Working Group
4 performed and continues to perform environmental response work, including site
5 investigation, at the BKK Class I Facility under the Amended Third Partial Consent
6 Decree. All work performed under the Amended Third Partial Consent Decree is
7 deemed to be, and was, necessary and performed in accordance with the NCP.

8 818. The response costs, including site investigation costs, incurred by the
9 Plaintiffs are necessary to address the release and/or threatened release at the BKK
10 Class I Facility and are required by DTSC in the First, Second, Third Partial, and
11 Amended Third Partial Consent Decrees. Plaintiffs will continue to incur response
12 costs, including site investigation expenses, to conduct response actions at the BKK
13 Class I Facility as required by DTSC.

14 819. Plaintiffs have incurred, and continue to incur, necessary response
15 costs, including consulting and attorney fees, consistent with the NCP at the BKK
16 Class I Facility associated with efforts to identify potentially responsible parties
17 (“PRPs”), including Defendants, that arranged for the disposal, or arranged with
18 third-party transporters for the disposal, of Hazardous Substances at the BKK Class
19 I Facility. Such efforts include working with DTSC to recover handwritten
20 manifests and other waste records from the BKK Corp. warehouse and other
21 locations, information contained on the computer system utilized by BKK Corp. at
22 the BKK Class I Facility and reviewing information available through the State of
23 California regarding manifested and other waste disposed at the BKK Class I
24 Facility. This investigation for the purpose of identification of additional PRPs is
25 ongoing.

26 820. The environmental conditions at the BKK Class I Facility, and the
27 attendant costs that have been and are continuing to be incurred by Plaintiffs are the

28

1 direct result of Defendants having arranged to dispose Hazardous Substances at the
2 BKK Class I Facility.

3 821. In 2020, DTSC estimated that necessary response actions to fully
4 remediate the BKK Class I Facility would cost \$869,286,436.

5 822. Plaintiffs have incurred or are committed to incur not less than
6 approximately \$250 million in costs associated with the BKK Class I Facility.

7 823. To date, Defendants have failed to participate in or contribute to any
8 work or costs at the BKK Class I Facility.

9 **FIRST CLAIM FOR RELIEF**

10 **Contribution, CERCLA § 113(f) (42 U.S.C. § 9613(f))**

11 824. Paragraphs 1-824 are incorporated by reference.

12 825. Section 113(f)(1) of CERCLA, 42 U.S.C. § 9613(f)(1), provides in
13 pertinent part:

14 Any person may seek contribution from any other person
15 who is liable or potentially liable under section 9607(a) of
16 this title, during or following any civil action under section
17 9606 of this title or under section 9607 of this title. Such
18 claims shall be brought in accordance with this section and
19 the Federal Rules of Civil Procedure, and shall be governed
20 by Federal law. In resolving contribution claims, the court
21 may allocate response costs among liable parties using
22 such equitable factors as the court determines are
23 appropriate.

24 826. Section 113(f)(3)(B) of CERCLA, 42 U.S.C. § 9613(f)(3)(B), provides
25 in pertinent part:

26 A person who has resolved its liability to the United States
27 or a State for some or all of a response action or for some
28 or all of the costs of such action in an administrative or
judicially approved settlement may seek contribution from
any person who is not party to a settlement referred to in
paragraph (2) [*i.e.*, “[a] person who has resolved its liability
to the United States or a State in an administrative or
judicially approved settlement”].

1 827. Plaintiffs that are individual members of the BKK Working Group,
2 have been subject to three separate civil actions under CERCLA § 9607: the Initial
3 Site Action, the Second Site Action, and the Third Site Action.

4 828. The First, Second and Third Partial and Amended Third Partial
5 Consent Decrees are judicially-approved settlements that resolve liability of the
6 member Plaintiffs to the State of California for response actions taken at the BKK
7 Class I Facility, and for costs of such response actions.

8 829. The interim settlement agreements entered into between DTSC and
9 certain members of the BKK Working Group were administratively approved and
10 resolved liability of those Plaintiffs to the State of California for response actions
11 taken at the BKK Class I Facility, and for costs of such response actions.

12 830. Defendants are “person[s] who [are] liable or potentially liable under
13 section 9607(a).”

14 831. Defendants have not resolved their liability to the United States or to
15 the State of California in an administrative or judicially approved settlement for
16 response costs arising from the BKK Class I Facility.

17 832. Plaintiffs are entitled to contribution from Defendants under CERCLA
18 § 113(f)(1), 42 U.S.C. § 9613(f)(1), and CERCLA § 113(f)(3)(B), 42 U.S.C.
19 § 9613(f)(3)(B), of an equitable share of all response costs incurred to date as the
20 result of a release or threatened release (within the meaning of CERCLA § 101(22),
21 42 U.S.C. § 9601(22)) of Hazardous Substances at and from the BKK Class I
22 Facility.

23 833. While Defendants are liable for necessary response costs, including
24 site investigation expenses, incurred by Plaintiffs in compliance with the NCP,
25 Defendants have not contributed an equitable share of those costs.

26 834. Defendants are liable for contribution to reimburse Plaintiffs for their
27 respective equitable shares of all costs and liability incurred by Plaintiffs as a result
28

1 of the release or any threatened release of Hazardous Substances at and from the
2 BKK Class I Facility.

3 835. Plaintiffs previously notified the Attorney General of the United States
4 and the Administrator of the United States Environmental Protection Agency about
5 this Action pursuant to Section 113(l) of CERCLA, 42 U.S.C. § 9613(l).

6 **SECOND CLAIM FOR RELIEF**

7 **Cost Recovery, CERCLA § 107(a) (42 U.S.C. § 9607(a))**

8 836. Paragraphs 1-836 are incorporated by reference.

9 837. Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), provides in pertinent
10 part:

11 (a) Notwithstanding any other provision or rule of law, and subject
12 only to the defenses set forth in subsection (b) of this section –

13 * * * *

14 (3) any person who by contract, agreement, or otherwise
15 arranged for disposal or treatment, or arranged with a
16 transporter for transport for disposal or treatment of
17 hazardous substances owned or possessed by such person
18 . . . shall be liable for –

19 * * * *

20 (B) any other necessary costs of response incurred by
21 any other person consistent with the national
22 contingency plan

23 838. Plaintiffs are each a “person” within the meaning of CERCLA
24 § 101(21), 42 U.S.C. § 9601(21).

25 839. Defendants are “persons” within the meaning of CERCLA § 101(21),
26 42 U.S.C. § 9601(21).

27 840. The BKK Class I Facility is a “facility” within the meaning of
28 CERCLA § 101(9), 42 U.S.C. § 9601(9).

1 841. Defendants arranged for disposal or treatment, or arranged with third-
2 party transporters for the disposal or treatment, of hazardous substances owned or
3 possessed by Defendants at the BKK Class I Facility.

4 842. Hazardous Substances at the BKK Class I Facility have been released
5 and/or pose a threat of release within the meaning of CERCLA § 101(22), 42
6 U.S.C. § 9601(22).

7 843. Separate from costs incurred by Plaintiffs pursuant to the First, Second
8 and Third Partial and Amended Third Partial Consent Decrees in resolution of
9 Plaintiffs' CERCLA liability to the State of California, Plaintiffs also voluntarily
10 have incurred certain additional response costs as result of a release or threatened
11 release of Hazardous Substances at and from the BKK Class I Facility.

12 844. Such costs include, but are not limited to, the costs of response for
13 installation of certain new equipment at the site, costs of response for the
14 replacement of certain aging equipment at the site necessary to facilitate further
15 cleanup actions, and costs of further site investigations, all of which have been
16 incurred and will continue to be incurred pursuant to CERCLA § 107(a), 42 U.S.C.
17 § 9607(a) and are consistent with the NCP.

18 845. Defendants are liable jointly and severally to Plaintiffs pursuant to
19 CERCLA § 107(a), 42 U.S.C. § 9607(a), for all such necessary response costs,
20 including but not limited to, reasonable attorneys' fees and prejudgment interest,
21 incurred as a result of the release or threatened release of Hazardous Substances at
22 and from the BKK Class I Facility. Such response costs have been incurred and
23 will continue to be incurred consistent with the NCP.

24 **THIRD CLAIM FOR RELIEF**

25 **CERCLA Subrogation, CERCLA § 112(c)(2) (42 U.S.C. § 9612(c))**

26 846. Paragraphs 1-846 are incorporated herein by reference.

27 847. CERCLA § 112(c)(2), 42 U.S.C. § 9612(c)(2), provides in pertinent
28 part:

1 Any person...who pays compensation pursuant to this
2 chapter to any claimant for damages or costs resulting from
3 a release of a hazardous substance shall be subrogated to
4 all rights, claims, and causes of action for such damages
5 and costs of removal that the claimant has under this
6 chapter or any other law.

7 848. Plaintiff Stauffer Management Company LLC has paid the response
8 costs incurred by Bayer CropScience, Inc. relating to the BKK Class I Facility.
9 Plaintiffs Bayer CropScience, Inc. and Stauffer Management Company LLC
10 presented a written claim to Defendants prior to the initiation of this litigation for
11 reimbursement of their fair share of Bayer CropScience Inc.'s past and future
12 response costs incurred at the BKK Class I facility, which Defendants failed to
13 satisfy. Accordingly, pursuant to CERCLA § 112(c)(2), 42 U.S.C. § 9612(c)(2),
14 Stauffer Management Company LLC has paid compensation pursuant to CERCLA
15 to a claimant, Bayer CropScience, Inc., resulting from a release of a hazardous
16 substance, and is therefore subrogated to all rights, claims, and causes of action for
17 such damages and costs of removal that BKK Working Group member Bayer
18 CropScience, Inc. has under this chapter or any other law and seeks Defendants'
19 fair share of costs incurred by Stauffer Management Company LLC through its
20 payments made to satisfy Bayer CropScience's obligations.

21 849. Plaintiff Stauffer Management Company LLC, which has received
22 some reimbursement payments from Syngenta Crop Protection, LLC for costs
23 Stauffer Management Company LLC incurred paying Bayer CropScience Inc.'s
24 obligations for response costs relating to the BKK Class I Facility, has been
25 assigned Syngenta Crop Protection, LLC's rights to subrogation for such payments.
26 Syngenta Crop Protection, LLC's payments were made to Stauffer Management
27 Company LLC, which is a claimant within the meaning of CERCLA § 112(c)(2),
28 42 U.S.C. § 9612(c)(2), for costs resulting from a release of hazardous substances.
Therefore, Stauffer Management Company LLC, through assignment of Syngenta
Crop Protection, LLC's rights, is entitled to recover from Defendants their fair

1 share of those costs incurred by Syngenta Crop Protection, LLC in partially
2 reimbursing Stauffer Management Company LLC for the response costs Stauffer
3 Management Company LLC paid to satisfy the response cost obligations incurred
4 by Bayer CropScience Inc. relating to the BKK Class I Facility.

5 850. Response costs incurred by Plaintiffs that are individual members of
6 the BKK Working Group may have been paid by or reimbursed by a separate
7 entity. Therefore, Plaintiffs presented a written claim to Defendants prior to the
8 initiation of this litigation for reimbursement of their fair share of Plaintiffs' past
9 and future response costs incurred at the BKK Class I facility, which Defendants
10 failed to satisfy. Thus, making them a claimant within the meaning of Section
11 112(c).

12 **FOURTH CLAIM FOR RELIEF**

13 **Declaratory Relief, CERCLA § 113(g)(2) (42 U.S.C. § 9613(g)(2))**

14 851. Paragraphs 1-851 are incorporated herein by reference.

15 852. CERCLA § 113(g)(2), 42 U.S.C. § 9613(g)(2), provides in pertinent
16 part:

17 In any action described in this subsection the court shall
18 enter a declaratory judgment on liability for response costs
19 or damages that will be binding on any subsequent action
or actions to recover further response costs or damages.

20 853. Defendants are jointly and severally liable to Plaintiffs for the
21 reimbursement of necessary response costs, including site investigation expenses,
22 incurred by Plaintiffs consistent with the NCP under CERCLA § 107(a), 42 U.S.C.
23 § 9607(a). Defendants are also severally liable to Plaintiffs under CERCLA §
24 113(f)(1), 42 U.S.C. § 9613(f)(1), and CERCLA § 113(f)(3)(B), 42 U.S.C. §
25 9613(f)(3)(B) for an equitable share of Plaintiffs' response costs incurred pursuant
26 to the First, Second, Third Partial and Amended Third Partial Consent Decrees, and
27 any future consent decrees, as a result of the release or threatened release of
28 Hazardous Substances at and from the BKK Class I Facility. Plaintiffs are

1 therefore entitled to a declaratory judgment pursuant to CERCLA § 113(g)(2), 42
2 U.S.C. § 9613(g)(2) and *Boeing Co. v. Cascade Corp.*, 207 F.3d 1177, 1191 (9th
3 Cir. 2000), binding as to any subsequent action or actions by Plaintiffs, declaring
4 that Defendants are jointly and severally liable to Plaintiffs for reimbursement of
5 their necessary response costs incurred consistent with the NCP under CERCLA
6 § 107(a), 42 U.S.C. § 9607(a), and are also severally liable for an equitable share of
7 Plaintiffs' future responses costs incurred pursuant to the First, Second, Third
8 Partial and Amended Third Partial Consent Decrees, and any future consent
9 decrees, to address the release or threatened release of Hazardous Substances at and
10 from the BKK Class I Facility.

11 **FIFTH CLAIM FOR RELIEF**

12 **Contribution, Hazardous Substance Account Act, California Health and**
13 **Safety Code section 78000 et seq.**

14 854. Paragraphs 1-854 are incorporated herein by reference.

15 855. Plaintiffs bring their claim for contribution against all Defendants,
16 except the following: the City of Baldwin Park; the City of Carson; the City of
17 Fontana; the City of Gardena; the City of Inglewood; the City of Pomona; the City
18 of Riverside; the City of San Diego; the City of Whittier; Burbank Unified School
19 District; Conejo Valley Unified School District; Fresno Unified School District;
20 Fullerton Unified School District; Glendale Unified School District; Irvine Ranch
21 Water District; and, the South Coast County Water District.

22 856. The Carpenter-Presley-Tanner Hazardous Substance Account Act
23 (“HSAA”), California Health and Safety Code section 78000 et seq., provides a
24 statutory right of contribution for those parties who clean up contaminated sites
25 from those parties who are responsible for the contamination.

26 857. Section 79670(a) of the HSAA provides that “A person who has
27 incurred response or corrective action costs in accordance with this chapter,
28

1 Chapter 6.5 (commencing with Section 25100 [sic]) or [CERCLA] may seek
2 contribution or indemnity from any person who is liable pursuant to this chapter.”

3 858. A “liable person” is defined in section 78145(a)(1) of the HSAA as
4 “those persons described in section 107(a) of [CERCLA] (42 U.S.C. Section
5 9607(a)).”

6 859. Section 107(a) of CERCLA describes, among others, “any person
7 who... arranged for disposal or treatment” of Hazardous Substances “owned or
8 possessed by such person,” or “any person who accepts or accepted any” Hazardous
9 Substances “for transport to disposal or treatment facilities.”

10 860. Defendants are each a “person” within the meaning of section 78085
11 and 78145(a)(1) of the Health and Safety Code.

12 861. There have been releases or threatened releases from the BKK Class I
13 Facility.

14 862. As a direct and proximate result of Defendants’ actions that
15 contributed to releases of Hazardous Substances at the BKK Class I Facility,
16 Plaintiffs have incurred response costs, including site investigation costs, in
17 accordance with the HSAA and CERCLA.

18 863. Plaintiffs have given the Director of the Department of Toxic
19 Substances Control notice of the commencement of this action as required by
20 Health and Safety Code section 79670(c).

21 864. Plaintiffs are entitled to contribution or indemnity from Defendants,
22 and each of them, under section 79670 of the Health and Safety Code, for all past,
23 present and future necessary responses costs.

24 **SIXTH CLAIM FOR RELIEF**

25 **Equitable Indemnification**

26 865. Paragraphs 1-865 are incorporated herein by reference.

27 866. Plaintiffs have been required to pay environmental response costs at
28 the BKK Class I Facility.

1 867. The disposal of wastes containing Hazardous Substances at the BKK
2 Class I Facility by Defendants is a substantial factor in causing the environmental
3 conditions present at the BKK Class I Facility.

4 868. A substantial portion of the expenses the Plaintiffs have incurred in
5 response to the actual or threatened release of Hazardous Substances at and from
6 the BKK Class I Facility, including but not limited to investigatory expenses, are
7 the result of the conduct of Defendants.

8 869. As a result, Plaintiffs are entitled to complete or partial indemnity from
9 Defendants for such expenses pursuant to the doctrine of equitable indemnification.

10 **SEVENTH CLAIM FOR RELIEF**

11 **Equitable Contribution**

12 870. Paragraphs 1-870 are incorporated herein by reference.

13 871. Plaintiffs have been required to pay environmental cleanup and other
14 costs at the BKK Class I Facility, and a money judgment has been or will be
15 rendered jointly against Plaintiffs and Defendants.

16 872. Plaintiffs have discharged or will discharge the joint judgment and/or
17 have paid or will pay more than Plaintiffs' equitable pro rata share of the joint
18 judgment.

19 873. As a result, Plaintiffs are entitled to contribution from Defendants for
20 the excess paid over the Plaintiffs' equitable pro rata shares of the joint judgment.

21 **EIGHTH CLAIM FOR RELIEF**

22 **Common Law Subrogation**

23 874. Paragraphs 1-874 are incorporated herein by reference.

24 875. As a direct and proximate result of the actions of Defendants, Plaintiff
25 Stauffer Management Company LLC has incurred and paid amounts, damages,
26 costs, expenses and fees, and may in the future incur additional liabilities through
27 its payments of Bayer CropScience, Inc.'s obligations for response costs relating to
28

1 the BKK Class I Facility. It is therefore subrogated to all state and federal causes of
2 action Bayer CropScience, Inc. otherwise would have against Defendants.

3 876. Through assignment, Plaintiff Stauffer Management Company LLC
4 has the right to recoup costs incurred by Syngenta Crop Protection, LLC in
5 reimbursing Stauffer Management Company LLC for response costs Stauffer
6 Management Company LLC incurred paying Bayer Crop Science, Inc.'s
7 obligations for response costs relating to the BKK Class I Facility. Based on those
8 reimbursement payments, and to the extent of those payments, Syngenta Crop
9 Protection, LLC is subrogated to all state and federal causes of action Bayer
10 CropScience, Inc. and/or Stauffer Management Company LLC otherwise would
11 have against Defendants.

12 **NINTH CLAIM FOR RELIEF**

13 **Declaratory Relief, CAL. CODE OF CIVIL PROCEDURE § 1060**

14 877. Paragraphs 1-877 are incorporated herein by reference.

15 878. Cal. Code of Civil Procedure § 1060 provides in pertinent part:

16 Any person . . . who desires a declaration of his or her rights
17 or duties with respect to another, or in respect to property .
18 . . may, in a case of actual controversy relating to the legal
19 rights and duties of the respective parties, bring an original
20 action or cross-complaint in the superior court . . . for a
21 declaration of his or her rights and duties in the premises. .
22 . . He or she may ask for a declaration of rights or duties
23 either alone or with other relief; and the court may make a
24 binding declaration of these rights or duties, whether or not
25 further relief is claimed at the time.

22 879. An actual controversy now exists between Plaintiffs and Defendants
23 regarding Defendants' liability for any and all costs and damages incurred and to be
24 incurred in the future by Plaintiffs arising from the BKK Class I Facility. Plaintiffs
25 contend that Defendants' liability in this regard is based on CERCLA § 112, and
26 113, the Hazardous Substances Account Act, California Health and Safety Code §
27 78000 et seq., the common law theory of equitable indemnification, and the
28 common law theory of equitable subrogation (for the indemnitor plaintiffs).

1 880. A declaratory judgment under California Code of Civil Procedure §
2 1060 for recovery of such costs and damages is appropriate and in the public
3 interest because: it will prevent the need for multiple lawsuits as the Plaintiffs
4 continue to incur future costs; it will provide a final resolution of the issues of
5 liability for those costs; and it will insure a prompt and effective response to
6 environmental conditions at the BKK Class I Facility.

7 **JURY TRIAL DEMANDED**

8 881. Plaintiffs demand trial by jury pursuant to Federal Rule of Civil
9 Procedure 38 on all causes and issues so triable under Section 16 of Article I of the
10 California Constitution, the Seventh Amendment to the Constitution, or as may be
11 guaranteed by statute.

12 **PRAYER FOR RELIEF**

13 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

- 14 1. Recovery of all costs, cost of abatement, and damages incurred by
15 Plaintiffs, including response costs consistent with the NCP, as a result of any
16 release or threatened release of Hazardous Substances at and from the BKK Class I
17 Facility;
- 18 2. Contribution of an equitable share of all costs, including response costs
19 incurred by Plaintiffs consistent with the NCP, as a result of any release or
20 threatened release of Hazardous Substances at and from the BKK Class I Facility;
- 21 3. A declaration binding in any subsequent action or actions brought by
22 Plaintiffs, that Defendants are jointly and severally liable for all future costs
23 Plaintiffs incur as a result of the release or threatened release of Hazardous
24 Substances at and from the BKK Class I Facility, and are severally liable for an
25 equitable share of all future response costs Plaintiffs incur pursuant to the First,
26 Second, Third Partial and Amended Third Partial Consent Decrees, and any future
27 consent decrees, to address the release or threatened release of Hazardous
28 Substances at and from the BKK Class I Facility;

1 4. Indemnification for and/or contribution to all costs, damages and
2 liability, in an amount to be proved at trial, that Plaintiffs have incurred as a result
3 of the release or threatened release of Hazardous Substances at and from the BKK
4 Class I Facility;

5 5. Retention of jurisdiction over this action by this Court after entry of
6 the requested declaratory judgment to grant further relief as may be necessary or
7 proper;

8 6. Attorney’s fees and pre-judgment interest (as response costs); and

9 7. Such other relief as the Court may deem just and appropriate.

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Dated: April 29, 2024

MORGAN, LEWIS & BOCKIUS LLP

By /s/James J. Dragna
James J. Dragna
Denise Gail Fellers
Attorneys for Plaintiff
BKK WORKING GROUP, an
unincorporated association, and its
individual members identified
herein

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9 Attorneys for Plaintiffs
10 BKK WORKING GROUP, an unincorporated
11 association, and individual members identified
12 below

13 UNITED STATES DISTRICT COURT
14 CENTRAL DISTRICT OF CALIFORNIA

15 BKK WORKING GROUP;
16 ANADARKO E&P ONSHORE
17 LLC; ATLANTIC RICHFIELD
18 COMPANY; ASHLAND INC.;
19 BAYER CROPSCIENCE INC.;
20 BIG HEART PET BRANDS; THE
21 BOEING COMPANY;
22 CALIFORNIA RESOURCES
23 CORPORATION; CHEVRON
24 ENVIRONMENTAL
25 MANAGEMENT COMPANY;
26 CHEVRON MARINE PRODUCTS
27 LLC; CONOCOPHILLIPS
28 COMPANY; CROSBY &
OVERTON, INC.; THE DOW
CHEMICAL COMPANY;
DUCOMMUN
AEROSTRUCTURES, INC.;
ESSEX CHEMICAL
CORPORATION; EXXON MOBIL
CORPORATION; GEMINI
INDUSTRIES, INC.; GENERAL
DYNAMICS CORPORATION;
GENERAL LATEX AND
CHEMICAL CORPORATION;
HEWLETT-PACKARD
COMPANY; AMERICAN
HONDA MOTOR CO., INC.;
HUNTINGTON BEACH
COMPANY; LOCKHEED

Case No. 2:18-cv-05836-MWF-PLA

**[FILED PURSUANT TO CMO #1
[DKT. 101]]**

**NINTH AMENDED
COMPLAINT FOR:**

1. CERCLA: CONTRIBUTION [42 U.S.C. § 9613(f)]
2. CERCLA: COST RECOVERY [42 U.S.C. § 9607(a)]
3. CERCLA: SUBROGATION [42 U.S.C. § 9612(c)(2)]
4. CERCLA: DECLARATORY RELIEF [42 U.S.C. § 9613(g)]
5. HSAA: CONTRIBUTION [HEALTH AND SAFETY CODE §§ 78000, ET SEQ.]
6. EQUITABLE INDEMNIFICATION
7. EQUITABLE CONTRIBUTION
8. COMMON LAW SUBROGATION
9. DECLARATORY RELIEF [CAL. CIV. PROC. CODE §1060]

1 MARTIN CORPORATION;
2 MARS, INC. (FORMERLY
3 KNOWN AS KAL KAN FOODS
4 INC.); MONTROSE CHEMICAL
5 CORP. OF CALIFORNIA;
6 MORTELL COMPANY;
7 MORTON INTERNATIONAL,
8 INC.; NATIONAL STEEL AND
9 SHIPBUILDING COMPANY;
10 NORTHROP GRUMMAN
11 SYSTEMS CORPORATION; OXY
12 USA INC.; QUEMETCO, INC.;
13 ROCKWELL AUTOMATION,
14 INC.; ROHM & HAAS
15 COMPANY; ROHR, INC.; SAN
16 DIEGO GAS & ELECTRIC
17 COMPANY; SMITH
18 INTERNATIONAL, INC.;
19 SOUTHERN CALIFORNIA
20 EDISON COMPANY;
21 SOUTHERN CALIFORNIA GAS
22 COMPANY; STAUFFER
23 MANAGEMENT COMPANY
24 LLC; THE PROCTER &
25 GAMBLE MANUFACTURING
26 COMPANY; THUMS LONG
27 BEACH COMPANY; UNION
28 CARBIDE CORPORATION;
UNION PACIFIC RAILROAD
(FORMERLY KNOWN AS
SOUTHERN PACIFIC
TRANSPORTATION
COMPANY); UNITED STATES
STEEL CORPORATION; RTX
CORPORATION; UNIVAR
SOLUTIONS USA LLC;
AMERON INTERNATIONAL
CORPORATION; AND XEROX
CORPORATION,

Plaintiffs,

vs.

ALBERTSONS COMPANIES, INC.;
AAMCO TRANSMISSIONS; AAR
CORP.; A.B. DICK CO.; ABBOTT
POWER CORP; ACE INDUSTRIES;

1 ACH FOOD COMPANIES, INC.;
2 ADVANCED COATING INC.;
3 AEROSOL SERVICES CO. INC.; AIR
4 INDUSTRIES CORP.; AIR LIQUIDE
5 AMERICA LP; AIRPORT CONSULT
6 GROUP LLC; ALCO CAD NICKEL
7 PLATING CORP.; ALCO WELL
8 SERVICE INC.; ALKID
9 CORPORATION; ALPHA
10 CORPORATION; ALUMINUM
11 PRECISION PRODUCTS INC.;
12 AMERICAN APPLIANCE
13 MANUFACTURING CORP.;
14 AMERICAN CAN COMPANY;
15 AMERICAN CHEMICAL &
16 REFINING; AMERICAN PACIFIC
17 INTERNATIONAL INC.;
18 AMERICAN SCIENTIFIC
19 PRODUCTS; AMERICAN TOOL &
20 ENGINEERING CORP.;
21 AMERIPRIDE SERVICES, LLC;
22 AMF TUBESCOPE INC.; ANCHOR
23 POST PRODUCTS INC.; ANCO
24 METAL IMPROVEMENT CO.;
25 ANDREW CALIFORNIA CORP.;
26 ANODYNE INC.; APEX
27 INTERNATIONAL ALLOYS;
28 APOLLO MANUFACTURING CO.;
APPLIED MAGNETICS CORP.;
ARDAGH GROUP S.A.; ARGO
PETROLEUM CORP.;
ARROWHEAD MOUNTAIN SPRING
WATER COMPANY; ARMSTRONG
WORLD INDUSTRIES, INC.;
ARNOLD CIRCUITS, INC.;
ARNOLD ELECTRONICS INC.;
ARNOLD ENGINEERING CO.;
ATLAS FABRICATORS; ATOMICA
CORP.; AURUM INDUSTRIES, INC.;
AXEL JOHNSON, INC.; B. JADOW
AND SONS, INC.; B.P. JOHN
FURNITURE CO.; BAE SYSTEMS
SAN DIEGO SHIP REPAIR INC.;
BALSER TRUCKING; BARRY
WRIGHT CONTROLS; BAUSCH
HEALTH AMERICAS, INC.;
BAXTER INTERNATIONAL INC.;

1 BEATRICE HUNT WESSON INC.;
2 BEAZER EAST, INC.; BECKMAN
3 COULTER INC.; BECTON
4 DICKINSON AND COMPANY;
5 BERNARD EPPS & CO.;
6 BETHLEHEM STEEL CORP.;
7 BEVERLY HILLS OIL COMPANY;
8 BFI XV REALTY FUND LTD.; BIG
9 THREE INDUSTRIES INC.;
10 BIRTCHER PACIFIC; BLUE
11 TRITON BRANDS, INC.; BOSTIK,
12 INC.; BPJ INTERNATIONAL, INC.;
13 BRIDGESTONE AMERICAS, INC.;
14 BROOKS & PERKINS BROWNLIN
15 DIVISION; BYRON JACKSON
16 PUMPS; C&D TECHNOLOGIES,
17 INC.; CAL CHEM CLEANING CO.;
18 CAL NEV PIPELINE CO.; CAL
19 STYLE FURNITURE
20 MANUFACTURING CO.; CALI-
21 BLOK; CALBIOCHEM-BEHRING
22 CORP.; CALIFORNIA CARPET CO.;
23 CALPROTECH INC.; CAPITAL
24 PARADE USA, INC.; CARGILL
25 INC.; CARRIER CORPORATION;
26 CERRO CORPORATION; CHB
27 FOODS; CIA MINERA DE
28 CANANEA SA; CIRCUIT ONE DIV.
OF LH RESEARCH INC.;
CLEVELAND WRECKING CO.;
COAST PLATING, INC.; COGNIS
CORP.; COLUMBIA PICTURES;
CONAGRA BRANDS, INC.;
CONTROL COMPONENTS INC.;
CRAGAR INDUSTRIES; CRAIN
WESTERN, INC.; CRE
LIQUIDATION LLC; CROCKETT
CONTAINER CORP.; CROWLEY
INC.; CROWN BEVERAGE
PACKAGING; CROWN CENTRAL
LLC; CROWN CENTRAL
PETROLEUM CORPORATION;
CROWN DISPOSAL INC.; CROWN
ZELLERBACH CO.; CSX
TRANSPORTATION; CUMMINS
SERVICE & SALES INC.; CYCLO
CHEMICAL CO.; CYTEC

1 INDUSTRIES INC.; DAIWA CORP.;
2 DARNELL CORPORATE LTD.;
3 DATA PRODUCTS CORP.; DAVIS
4 INVESTMENT CO.; DECRATREND
5 CORP.; DENSCO PRODUCTS AND
6 SERVICES AMERICAS, INC.;
7 DESOTO INC.; DEVON ENERGY
8 CORP.; DISPOSAL CONTROL; DON
9 KOTT FORD; DOUGLAS
10 FURNITURE OF CALIFORNIA;
11 DOWTY PROPELLERS AMERICAS;
12 DRACKETT CO.; DRESSER
13 INDUSTRIES, INC.; DUREX INC.;
14 E.T.C. CARPET MILLS, LTD.; EAST
15 COAST OCEANVIEW, LLC; EL
16 FAB; ELECTROFILM INC.;
17 ELECTRONIC MATERIALS CORP.;
18 ELETRCOTECH CIRCUITS INC.;
19 ELEVATE TEXTILES; EME CORP.;
20 EMERALD EQUITIES; EMERSON
21 ELECTRIC CO.; EMERY
22 INDUSTRIES INC.;
23 EMPLOYBRIDGE LLC; EMRISE
24 ELECTRONICS CORP.; ENERGY
25 DEVELOPMENT CO. INC.;
26 ENVIRONMENTAL CONTROL
27 SYSTEMS INC.; EPEC OIL CO.
28 LIQUIDATING TRUST; FAIRCHILD
INDUSTRIES; FEDERAL EXPRESS
CORPORATION; FEDERAL
RESERVE BANK; FIBERITE WEST
COAST CORP.; FIRESTONE TIRE &
RUBBER CO.; FLETCHER OIL &
REFINING CO.; FLIGHT
ACCESORY SERVICE;
FLOWSERVE CORPORATION;
FOTOMAT LABS INC.; FLYING
TIGERS LINE; FRANCISCAN
CERAMICS INC.; FRAZEE
INDUSTRIES; FRICTION INC.;
FRICTION MATERIALS CORP.;
FMC CORPORATION; FORD
AEROSPACE AND
COMMUNICATIONS CORP.; FORT
JAMES LLC; FOSTER-FORBES
GLASS CO.; FRONTIER
CALIFORNIA, INC.; GATES

1 ADMIRAL; GATX; GATX CORP.;
2 GATX TERMINALS CORP.; GE
3 BETZ, INC.; GENERAL BATTERY
4 CORP.; GENERAL MILLS, INC.;
5 GENERAL TELEPHONE CO.;
6 GENSTAR BUILDING MATERIALS
7 CO.; GENSTAR ROOFING
8 PRODUCTS COMPANY, INC.;
9 GEORGIA-PACIFIC LLC; GERALD
10 CALIFORNIA LLC; GERALD
11 METALS, INC.; GLASS
12 CONTAINERS CORP.; GLASTEEL;
13 GLOBAL TUBE CORPORATION;
14 GRAY TRUCK LINES; GREER
15 HYDRAULICS INC.; GRUPO
16 MEXICO SAB DE CV;
17 GUARANTEED PRODUCTS INC.;
18 GWB (US), INC.; HALLMARK
19 CIRCUITS INC.; HALSTEAD
20 ENTERPRISES; HANDY &
21 HARMAN; HARSCO
22 CORPORATION; HAWKER-
23 PACIFIC AEROSPACE; HEINZ
24 FOODS; HEIST MAINTENANCE
25 SERVICES INC.; HENRY SOSS &
26 CO. INC.; HESS CORPORATION;
27 HILL BROTHERS CHEMICAL CO.;
28 HILLCREST BEVERLY OIL CORP.;
HI-SHEAR CORP.; HOFFMAN
ELECTRONICS; HOLLYTEX
CARPET MILLS, INC.; HOWMET
AEROSPACE INC.; HOYA
CORPORATION USA; HR
TEXTRON INC.; HTW INDUSTRIES
INC.; HUMCO PRODUCTS;
HUTCHINSON AEROSPACE &
INDUSTRY, INC.; HYDRAULIC
UNITS INC.; ICN
PHARMACEUTICALS; ICX
INDUSTRIES, INC.; ICX
NATIONAL, INC.; IMCO SERVICES;
IMI CRITICAL ENGINEERING LLC;
INDUSTRIAL CIRCUITS;
INDUSTRIAL INSULATIONS
INCORPORATED; INDUSTRIAL
TECTONIC BEARINGS; INLAND
CONTAINER CORP.; INLAND

1 PAPERBOARD AND PACKAGING,
2 INC.; INTERNATIONAL POLYMER
3 CORP.; I.T. CORP.; ITT LLC; J.C.
4 INC.; JCI ENVIRONMENTAL
5 SERVICES; JCX; JELD-WEN, INC.;
6 JERSEY MAID MILK PRODUCTS
7 INC.; JOHNSON CONTROLS INC.;
8 JOHNSTON PUMP CO.; JONATHAN
9 MANUFACTURING CORP.;
10 JOSLYN MANUFACTURING &
11 SUPPLY CO.; KAISER
12 FOUNDATION HEALTH PLAN,
13 INC.; KAISER ROLLMET INC.;
14 KAYNAR MANUFACTURING CO.;
15 KERR-MCGEE CHEMICAL
16 WORLWIDE LLC; KEUFFEL &
17 ESSER CO.; KINDER MORGAN
18 ENERGY PARTNERS, L.P.;
19 KNUDSEN CORP.; KONICA PHOTO
20 SERVICE U.S.A., INC.; KORBEL
21 CAPITAL LLC; KRAZY GLUE INC.;
22 L'OREAL USA, INC.; LANXESS
23 CORPORATION; LIQUID WASTE
24 MANAGEMENT; LISI AEROSPACE
25 NORTH AMERICA, INC.; LONG
26 BEACH FABRICATORS INC.;
27 LONZA INC.; LORAL SPACE &
28 COMMUNICATIONS INC.; LOS
ANGLES GAUGE CO.; LOS
ANGLES PLATING CO.; LUCKY
STORES INC.; LUMIDOR
MANUFACTURING CO.; M-I L.L.C.
AKA AND/OR DBA M-I SWACO;
MACDERMID PRINTING
SOLUTIONS; MACK TRUCKS INC.;
MAERSK LINE, LIMITED (MLL);
MARCO CHEMICAL CO; MARTEN
MANAGEMENT CO.; MAXWELL
LABORATORIES INC.; MAZDA
MOTOR OF AMERICA, INC.;
MAZDA NORTH AMERICA; MCA
LABORATORIES; MCKAY
CHEMICAL CO.; MEAD JOHNSON
& COMPANY; MERCURY
AEROSPACE INC.; MERCURY
AEROSPACE FASTENERS; MEREL
CO. INC.; METAL BOX CAN; MGF

1 INDUSTRIES; MR. GASKET
2 COMPANY; MRC HOLDINGS, INC.;
3 NARCO CHEMICAL; NARCO
4 CORPORATION; NARMCO
5 MATERIALS INC.; NATIONAL
6 OILWELL VARCO; NAVCOM
7 DEFENSE ELECTRONICS, INC.;
8 NEWELL BRANDS INC.; NEW
9 FASHION CLEANERS;
10 NIPPONDENSO OF LOS ANGELES;
11 NORTH AMERICAN CAR CORP.;
12 NORTH AMERICAN
13 ENVIRONMENTAL; NORTHROP
14 PACIFIC; NORWEST EQUITY
15 PARTNERS; NOVARTIS CORP.;
16 OLD QUAKER PAINT CO.;
17 ORANGE COUNTY SANITATION
18 DISTRICT; ORYX ENERGY
19 COMPANY; PACIFIC ANCHOR
20 CHEMICAL CORP.; PACIFIC
21 INTERMOUNTAIN EXPRESS;
22 PACIFIC SOUTHWEST AIRLINES;
23 PACKAING CORP. OF AMERICA;
24 PACTIV LLC; PAINT & COATINGS
25 CORP.; PANEL AIR CORP.;
26 PARSONS CORPORATION;
27 PAULEY PETROLEUM CO.; PCC
28 ROLLMET, INC.; PEAIRS
ENGINEERS; PEAT
MANUFACUTURING CO.; PENSKE
LOGISTICS CORP.; PER-OLOF
LOOF FAMILY FOUNDATION,
INC.; PERVO INTERNATIONAL,
INC.; PERVO PAINT COMPANY;
PGP INDUSTRIES INC.;
PILLSBURY CO.; PRC-DESOTO
INTERNATIONAL INC.; PRE
DELIVERY SERVICE; PRECISION
CASTPARTS CORP.; PRICE
PFISTER *NKA* PFISTER; PRINTED
CIRCUITS, INC.; PRODUCTS
RESEARCH & CHEMICAL CORP.;
PROTO TOOL; PURE SOURCE LLC;
PUREX CORP.; PUREX
INDUSTRIES, INC.; RALPH M.
PARSONS CO.; REDKEN
LABORATORIES INC.; REGISTER

1 PROPERTIES INC.; REISNER
2 METALS; REPLACEMENT PARTS
3 MANUFACTURING; REXAM
4 BEVERAGE CAN COMPANY;
5 RICOH ELECTRONICS, INC.;
6 RICOH PRINTING SYSTEMS
7 AMERICA INC.; RIO TINTO ALCAN
8 INC.; ROBERTS MANUFACTURING
9 CO.; ROYAL ALUMINUM CO.;
10 RYDER SYSTEM, INC.; ROLLER
11 BEARING COMPANY OF
12 AMERICA, INC.; S.J. JOHNSON &
13 SON, INC.; SAN DIEGO PIPE LINE
14 CO.; SAFEWAY STORES INC.; SAN
15 FERNANDO LABORATORIES;
16 SANDIA METAL PROCESS, INC.;
17 SARGENT FLETCHER INC.;
18 SARGENT INDUSTRIES;
19 SCHLUMBERGER, LTD.;
20 SCHLUMBERGER N.V.; SEA LAND
21 SERVICE INC.; SERVICE
22 CHEMICAL CO.; SHUWA
23 INVESTMENTS CORP.; SMITH &
24 CO.; SOMACIS INC.; SONY
25 PICTURES ENTERTAINMENT INC.;
26 SOUTH WEST FOREST PRODUCTS;
27 SOUTHERN CALIFORNIA
28 CHEMICAL; SOUTHERN PACIFIC
PIPE LINES, INC.; SOUTHWEST
STEEL ROLLING MILLS;
SOUTHWESTERN ENGINEERING;
STANDARD MOTOR PRODUCTS,
INC.; STANDARD INDUSTRIAL
TOWEL & UNIFORM; STANLEY
BLACK & DECKER, INC.;
STRUCTURAL COMPOSITE
INDUSTRIES; SUN EXPLORATION;
SUN CAPITAL PARTNERS, INC.;
SWECO, INC.; T.P. INDUSTRIAL
INC.; TDY INDUSTRIES, LLC;
TELAIR US LLC; TENNECO INC.;
TENNECO OIL CO.; TESLA, INC.;
THE SAVE MART COMPANIES,
LLC; THOMPSON INDUSTRIES;
THORPE INSULATION CO.; TIMES
MIRROR PRESS; TOOLEY & CO.
INC.; TOPPAN PRINTING

1 COMPANY (AMERICA), INC.;

2 TOYOTA MOTOR

3 MANUFACTURING USA;

4 TRAMMEL CROW COMPANY;

5 TRANSEQUIP PACIFIC INC.; TRE

6 CORP.; TREATOLITE CORP.;

7 TRIBUNE PUBLISHING COMPANY;

8 TRIMAS CORPORATION;

9 TRIUMPH GROUP OPERATIONS;

10 TRIZEC PROPERTIES; TROJAN

11 BATTERY CO; TRUCK

12 TRANSPORT; TRZ HOLDINGS LLC;

13 TURKISH PRODUCTS, INC.; U.S.

14 BORAX & CHEMICAL CORP.; U.S.

15 BRASS DIVISION; U.S. FILTERS;

16 U.S. REDUCTION CO.; ULTRAMAR

17 INC.; UNITED COATINGS INC.;

18 VALCO; VALENTEC

19 INTERNATIONAL CORP.; VALERO

20 ENERGY CORPORATION; VAN DE

21 KAMP; VARCO INTERNATIONAL;

22 VEOLIA ENVIRONMENTAL

23 SERVICES NORTH AMERICA, LLC;

24 VERIZON NEW YORK INC.; VEST,

25 INC. VF CORPORATION; VONS

26 COMPANIES INC.; VOUGHT

27 AIRCRAFT INDUSTRIES INC.; WM

28 HEALTHCARE SOLUTIONS, INC.;

W. SMITH CO.; W. SMITH CO.

CONTAINER RECONDITIONING;

WEBER AIRCRAFT; WELLS

FARGO RAIL CORPORATION;

WELLS MARINE INC.; WESLOCK

CORP.; WEST VALLEY TOYOTA;

WESTERN KRAFT CORP.;

WESTERN LITHOGRAPH;

WESTERN SYNTHETIC FELT CO.;

WESTMINSTER CERAMICS INC.;

WHITTAKER CORP.;

WINDOWMASTER PRODUCTS;

WOODWARD HRT, INC.; XTRA

ENERGY; YOPLAIT USA;

ZIMMERS TRUCK STOP; and DOES

1-10,

Defendants.

1 Plaintiffs BKK WORKING GROUP; ANADARKO E&P ONSHORE
2 LLC; ATLANTIC RICHFIELD COMPANY; ASHLAND INC.; BAYER
3 CROPSCIENCE INC.; BIG HEART PET BRANDS; THE BOEING
4 COMPANY; CALIFORNIA RESOURCES CORPORATION; CHEVRON
5 ENVIRONMENTAL MANAGEMENT COMPANY; CHEVRON MARINE
6 PRODUCTS LLC; CONOCOPHILLIPS COMPANY; CROSBY &
7 OVERTON, INC.; THE DOW CHEMICAL COMPANY; DUCOMMUN
8 AEROSTRUCTURES, INC.; ESSEX CHEMICAL CORPORATION; EXXON
9 MOBIL CORPORATION; GEMINI INDUSTRIES, INC.; GENERAL
10 DYNAMICS CORPORATION; GENERAL LATEX AND CHEMICAL
11 CORPORATION; HEWLETT-PACKARD COMPANY; AMERICAN
12 HONDA MOTOR CO., INC.; HUNTINGTON BEACH COMPANY;
13 LOCKHEED MARTIN CORPORATION; MARS, INC. (FORMERLY
14 KNOWN AS KAL KAN FOODS INC.); MONTROSE CHEMICAL CORP.
15 OF CALIFORNIA; MORTELL COMPANY; MORTON INTERNATIONAL,
16 INC.; NATIONAL STEEL AND SHIPBUILDING COMPANY; NORTHROP
17 GRUMMAN SYSTEMS CORPORATION; OXY USA INC.; QUEMETCO,
18 INC.; ROCKWELL AUTOMATION, INC.; ROHM & HAAS COMPANY;
19 ROHR, INC.; SAN DIEGO GAS & ELECTRIC COMPANY; SMITH
20 INTERNATIONAL, INC.; SOUTHERN CALIFORNIA EDISON
21 COMPANY; SOUTHERN CALIFORNIA GAS COMPANY; STAUFFER
22 MANAGEMENT COMPANY LLC; THE PROCTER & GAMBLE
23 MANUFACTURING COMPANY; THUMS LONG BEACH COMPANY;
24 UNION CARBIDE CORPORATION; UNION PACIFIC RAILROAD
25 (FORMERLY KNOWN AS SOUTHERN PACIFIC TRANSPORTATION
26 COMPANY); UNITED STATES STEEL CORPORATION; RTX
27 CORPORATION; UNIVAR SOLUTIONS USA LLC; AMERON
28 INTERNATIONAL CORPORATION; AND XEROX CORPORATION

1 (collectively referred to herein as “Plaintiffs” or individually as “Plaintiff”)
2 allege as follows:

3 **STATEMENT OF THE CASE**

4 1. This is a civil action for cost recovery and contribution under Sections
5 107(a) and 113 of the Comprehensive Environmental Response, Compensation and
6 Liability Act of 1980, as amended, 42 U.S.C. § 9601 *et. seq.* (“CERCLA”) and for
7 contribution under The Carpenter-Presley-Tanner Hazardous Substance Account
8 Act (“HSAA”), California Health and Safety Code section 78000 *et seq.*,¹ relating
9 to the release and/or threatened release of hazardous substances, as that term is
10 defined in Section 101(14) of CERCLA, 42 U.S.C. § 9601 (“Hazardous
11 Substances”), from a facility known as the BKK Class I Landfill.

12 2. The BKK Class I Landfill is located on a portion of a much larger 583-
13 acre property located at 2210 South Azusa Avenue, West Covina, Los Angeles
14 County, California. Other facilities located on this property include a closed Class
15 III municipal landfill, a Leachate Treatment Plant (“LTP”), service roads, and
16 related pollution control equipment. The BKK Class I Landfill and the LTP,
17 service roads, and related pollution control equipment which serve it, are
18 collectively referred to hereinafter as the “BKK Class I Facility”² and are the
19 subject of this lawsuit. The closed Class III municipal landfill is not the subject of
20 this lawsuit. True and correct copies of the parcel maps describing the property are
21 attached hereto as **Exhibit A**.

22
23
24 ¹ Effective January 1, 2024, the California Legislature recodified and reorganized
25 the HSAA without substantive changes. (2022 Cal. Legis. Serv. Ch. 257 (Assem.
26 Bill No. 2293).

27 ² “BKK Class I Facility,” as used herein, is equivalent to the term “Subject
28 Property” as that term is used in the First, Second Third Partial and Amended Third
Partial Consent Decrees. The First, Second Third Partial and Amended Third
Partial Consent Decrees are defined *infra* at Paragraphs 820, 825, 830 and 835,
respectively.

1 3. The State of California has alleged in a series of three complaints filed
2 against some or all of the Plaintiffs³ that it has incurred response costs in
3 connection with actions taken in response to releases or threatened releases of
4 Hazardous Substances at the BKK Class I Facility. Each of the parties named as a
5 defendant herein at paragraphs 64 - 475 and Does 1-10 (collectively referred to
6 herein as “Defendants” or individually as “Defendant”) generated, transported
7 and/or arranged for disposal of materials containing Hazardous Substances to the
8 BKK Facility.

9 4. Plaintiffs seek to recover from each Defendant pursuant to Section
10 107(a) of CERCLA, 42 U.S.C. § 9607(a), past and future necessary response costs
11 incurred and to be incurred by Plaintiffs in a manner consistent with the National
12 Contingency Plan, 40 C.F.R. Part 300 *et. seq.* (“NCP”), for response activities
13 undertaken and to be undertaken at and in relation to the BKK Class I Facility that
14 were caused by the release or threatened release of Hazardous Substances at and
15 from the BKK Class I Facility.

16 5. Plaintiffs also seek contribution from each Defendant pursuant to
17 Section 113(f) of CERCLA, 42 U.S.C. § 9613(f), for past and future necessary
18 response costs incurred and to be incurred by Plaintiffs pursuant to the First,
19 Second, Third Partial and Amended Third Partial Consent Decrees in a manner
20 consistent with the NCP for response activities undertaken and to be undertaken at
21 and in relation to the BKK Class I Facility that were caused by the release or
22 threatened release of Hazardous Substances at and from the BKK Class I Facility.

23 6. Plaintiffs further seek a declaration as to each Defendant’s liability and
24 associated allocation of past and future response costs in accordance with Section
25 113(g)(2)(B) of CERCLA, 42 U.S.C. § 9613(g)(2)(B), and *Boeing Co. v. Cascade*
26 *Corp.*, 207 F.3d 1177, 1191 (9th Cir. 2000), that will be binding in any subsequent

27
28 ³ The three complaints are described in more detail in paragraphs 819, 824 and 829,
infra.

1 action or actions brought by Plaintiffs against the Defendants to recover further
2 response costs.

3 7. Plaintiffs additionally seek contribution from each Defendant pursuant
4 to the Hazardous Substance Account Act (“HSAA”), Cal. Health and Safety Code
5 §§ 78000 et seq., and Cal. Health and Safety Code § 79670 for past and future
6 necessary response costs incurred and to be incurred by Plaintiffs in a manner
7 consistent with the NCP to address releases or threatened releases of Hazardous
8 Substances at and from the BKK Class I Facility.

9 8. Plaintiffs are also entitled to complete or partial indemnity from
10 Defendants for all costs incurred or to be incurred at the BKK Class I Facility,
11 pursuant to the doctrine of equitable indemnification.

12 9. A sub-set of Plaintiffs who allege they have reimbursed entities or
13 directly paid for and participated in directing response actions on behalf of other
14 entities (including other Plaintiffs) that have incurred past, necessary response
15 costs, including pursuant to the First, Second, Third Partial and Amended Third
16 Partial Consent Decrees in a manner consistent with the NCP, for response
17 activities undertaken at and in relation to the BKK Class I Facility, assert
18 subrogated cost recovery and contribution claims against each Defendant pursuant
19 to Section 112(c)(3) of CERCLA, 42 U.S.C. § 9612(c)(3), and pursuant to common
20 law equitable subrogation.

21 10. Plaintiffs also seek a declaratory judgment pursuant to the Declaratory
22 Judgment Act, 28 U.S.C. § 2201, *et seq.*, and California Code of Civil Procedure
23 §1060 setting forth the parties’ rights and obligations toward one another for future
24 costs incurred to address contamination at or from the BKK Class I Facility.

25 11. The BKK Working Group has incurred or is committed to incur not
26 less than approximately \$250 million in costs associated with the BKK Class I
27 Facility, and the total cost of necessary response actions to fully remediate the BKK
28 Class I Facility was estimated by the State of California Department of Toxic

1 Substances Control (“DTSC”) in 2020 to be \$869,286.436. Each Defendant has
2 declined or not responded to Plaintiffs’ request(s) to enter into, or has otherwise not
3 entered into, a tolling agreement to facilitate settlement discussions, necessitating
4 this lawsuit to resolve Defendants’ liabilities.

5 **JURISDICTION**

6 12. This Court has jurisdiction over this case pursuant to 28 U.S.C. § 1331
7 and Section 113(b) of CERCLA, 42 U.S.C. § 9613(b). This Court has jurisdiction
8 over the subject matter of the claims made under state law in this action under 28
9 U.S.C. § 1367(a) because the claims under state law arise out of the same common
10 nucleus of facts as the federal question jurisdiction claims set forth in this Ninth
11 Amended Complaint, and they are so closely related to the actions brought under
12 federal law that they form part of the same case or controversy.

13 **VENUE**

14 13. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)
15 because a substantial part of the events giving rise to this action occurred within
16 this District and because the BKK Class I Facility is located within this District.

17 14. Venue is also proper in this District pursuant to Section 113(b) of
18 CERCLA, 42 U.S.C. § 9613(b), because both the releases occurred and the
19 response costs were occurred in this District.

20 **PLAINTIFFS**

21 15. The BKK Working Group, also known as the BKK Joint Defense
22 Group, is an unincorporated association of entities of the type described in Federal
23 Rule of Civil Procedure 17(b)(3)(A) and Cal. Code of Civil Procedure § 369.5. The
24 BKK Working Group currently includes the Plaintiffs identified in paragraphs 16-
25 63 below as members, which assert the claims in this Ninth Amended Complaint on
26 their own behalf and as assignees of the claims at the BKK Class I Facility of the
27 following entities that are also BKK Working Group members: Baker Petrolite
28 LLC; Honeywell International Inc., Hugo Neu Proler, Shell Oil Company, Vigor

1 Shipyards, Inc., formerly known as Todd Pacific Shipyard Corp., Unisys
2 Corporation, and Wyeth Holdings, formerly known as American Cyanamid
3 (collectively referred to as the “Member Assignors”). The BKK Working Group is
4 also a Plaintiff as assignee of CERCLA claims relating to the BKK Class I Facility
5 of the Member Assignors. Plaintiffs are working together towards the common
6 objective of addressing conditions at the BKK Class I Facility in cooperation with
7 state and federal agencies. Each Plaintiff has incurred costs, including response
8 costs consistent with the NCP, at the BKK Class I Facility. The BKK Working
9 Group, and each of its individual members, is a “person” within the meaning of
10 CERCLA § 101(21), 42 U.S.C. § 9601(21).

11 16. Plaintiff Anadarko E&P Onshore LLC is a corporation organized
12 under the laws of the State of Delaware. At all times referred to herein, Anadarko
13 E&P Onshore LLC, or its corporate predecessor(s), was and is authorized to do
14 business, and was and is doing business, in California. The State of California has
15 alleged that Plaintiff Anadarko E&P Onshore LLC arranged for the disposal of a
16 Hazardous Substance at the BKK Class I Facility, as those terms are described in
17 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Anadarko E&P Onshore
18 LLC is a member of the BKK Working Group and as a member of the BKK
19 Working Group has incurred costs, including response costs in a manner consistent
20 with the NCP, at the BKK Class I Facility. Anadarko E&P Onshore LLC asserts no
21 allegations against the following Defendants: Sun Exploration, Kerr-McGee
22 Chemical Worldwide LLC (on the basis of it being the successor to or otherwise
23 being liable for manifested waste from Sun Exploration).

24 17. Plaintiff Ashland Inc. is a corporation organized under the laws of the
25 State of Kentucky and authorized to do business in the State of California. Ashland
26 Inc. is the corporate successor of Ashland Chemical Company and, for the matters
27 set forth herein, the assignee of Filtrol’s claims in the litigation. The State of
28 California has alleged that Ashland Chemical Company and Filtrol Corporation are

1 Covered Persons, as described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a),
2 who arranged for the disposal of Hazardous Substances at the BKK Class I Facility.
3 Ashland Inc. and Filtrol Corporation are members of the BKK Working Group and
4 as members of the BKK Working Group have incurred costs, including response
5 costs consistent with the NCP, at the BKK Class I Facility. Filtrol has assigned all
6 of its rights, claims and interests relevant hereto to Ashland Inc.

7 18. Plaintiff Atlantic Richfield Company is a corporation organized under
8 the laws of the State of Delaware. At all times referred to herein, Atlantic Richfield
9 Company, or its corporate predecessor(s), was and is authorized to do business, and
10 was and is doing business, in California. The State of California has alleged that
11 Plaintiff Atlantic Richfield Company arranged for the disposal of a Hazardous
12 Substance at the BKK Class I Facility, as those terms are described in section
13 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Atlantic Richfield Company is a
14 member of the BKK Working Group and as a member of the BKK Working Group
15 has incurred costs, including response costs consistent with the NCP, at the BKK
16 Class I Facility.

17 19. Plaintiff Bayer CropScience, Inc. is a corporation organized under the
18 laws of the State of Delaware. At all times referred to herein, Bayer CropScience
19 Inc., or its corporate predecessor(s), was and is authorized to do business, and was
20 and is doing business, in California. The State of California has alleged that
21 Plaintiff Bayer CropScience Inc. arranged for the disposal of a Hazardous
22 Substance at the BKK Class I Facility, as those terms are described in section
23 107(a) of CERCLA, 42 U.S.C. § 9607(a). Bayer CropScience Inc., as a member of
24 the BKK Working Group, has incurred costs, including response costs consistent
25 with the NCP, at the BKK Class I Facility.

26 20. Plaintiff Big Heart Pet Brands is a corporation organized under the
27 laws of the State of Delaware. At all times referred to herein, Big Heart Pet Brands,
28 or its corporate predecessor(s), was and is authorized to do business, and was and is

1 doing business, in California. The State of California has alleged that the assignee
2 to the successor in interest to certain liability of H.J. Heinz Company, arranged for
3 the disposal of a Hazardous Substance at the BKK Class I Facility, as those terms
4 are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Big
5 Heart Pet Brands is a member of the BKK Working Group and as a member of the
6 BKK Working Group has incurred costs, including response costs consistent with
7 the NCP, at the BKK Class I Facility.

8 21. Plaintiff The Boeing Company is a corporation organized under the
9 laws of the State of Delaware. At all times referred to herein, The Boeing
10 Company, or its corporate predecessor(s) or affiliates, was and is authorized to do
11 business, and was and is doing business, in California. The State of California has
12 alleged that Plaintiff The Boeing Company, or its corporate predecessor(s) in
13 interest or affiliate(s), arranged for the disposal of a Hazardous Substance at the
14 BKK Class I Facility, as those terms are described in section 107(a) of CERCLA,
15 42 U.S.C. § 9607(a). Plaintiff The Boeing Company is a member of the BKK
16 Working Group. As a member of the BKK Working Group, and also prior to
17 becoming a member, The Boeing Company has incurred costs, including response
18 costs consistent with the NCP, at the BKK Class I Facility.

19 22. Plaintiff California Resources Corporation is a corporation organized
20 under the laws of the State of Pennsylvania. At all times referred to herein,
21 California Resources Corporation, or its corporate predecessor(s), was and is
22 authorized to do business, and was and is doing business, in California. The State
23 of California has alleged that Plaintiff California Resources Corporation arranged
24 for the disposal of a Hazardous Substance at the BKK Class I Facility, as those
25 terms are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff
26 California Resources Corporation is a member of the BKK Working Group and as a
27 member of the BKK Working Group has incurred costs, including response costs
28 consistent with the NCP, at the BKK Class I Facility

1 23. Plaintiff Chevron Environmental Management Company is a
2 corporation organized under the laws of the State of California. At all times referred
3 to herein, Chevron Environmental Management Company, or its corporate
4 affiliate(s), was and is authorized to do business, and was and is doing business, in
5 California. The State of California has alleged that certain corporate affiliates of
6 Plaintiff Chevron Environmental Management Company arranged for the disposal
7 of a Hazardous Substance at the BKK Class I Facility, as those terms are described
8 in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Chevron
9 Environmental Management Company is a member of the BKK Working Group
10 and as a member of the BKK Working Group has incurred costs, including
11 response costs consistent with the NCP, at the BKK Class I Facility.

12 24. Plaintiff Chevron Marine Products LLC is a limited liability company
13 organized under the laws of the State of Delaware. At all times referred to herein,
14 Chevron Marine Products LLC, or its corporate predecessor(s), was and is
15 authorized to do business, and was and is doing business, in California. The State
16 of California has alleged that Plaintiff Chevron Marine Products LLC arranged for
17 the disposal of a Hazardous Substance at the BKK Class I Facility, as those terms
18 are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff
19 Chevron Marine Products LLC is a member of the BKK Working Group and as a
20 member of the BKK Working Group has incurred costs, including response costs
21 consistent with the NCP, at the BKK Class I Facility.

22 25. Reserved.

23 26. Plaintiff ConocoPhillips Company is a corporation organized under the
24 laws of the State of Delaware. At all times referred to herein, ConocoPhillips
25 Company, or its corporate predecessor(s), was and is authorized to do business, and
26 was and is doing business, in California. The State of California has alleged that
27 Plaintiff ConocoPhillips Company arranged for the disposal of a Hazardous
28 Substance at the BKK Class I Facility, as those terms are described in section

1 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff ConocoPhillips Company is a
2 member of the BKK Working Group and as a member of the BKK Working Group
3 has incurred costs, including response costs consistent with the NCP, at the BKK
4 Class I Facility.

5 27. Plaintiff Crosby & Overton, Inc. is a corporation organized under the
6 laws of the State of California. At all times referred to herein, Crosby & Overton,
7 Inc., or its corporate predecessor(s), was and is authorized to do business, and was
8 and is doing business, in California. The State of California has alleged that
9 Plaintiff Crosby & Overton, Inc. arranged for the disposal of a Hazardous
10 Substance at the BKK Class I Facility, as those terms are described in section
11 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Crosby & Overton, Inc. is a
12 member of the BKK Working Group and as a member of the BKK Working Group
13 has incurred costs, including response costs consistent with the NCP, at the BKK
14 Class I Facility.

15 28. Plaintiff The Dow Chemical Company is a corporation organized
16 under the laws of the State of Delaware. At all times referred to herein, The Dow
17 Chemical Company, or its corporate predecessor(s), was and is authorized to do
18 business, and was and is doing business, in California. The State of California has
19 alleged that Plaintiff The Dow Chemical Company arranged for the disposal of a
20 Hazardous Substance at the BKK Class I Facility, as those terms are described in
21 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff The Dow Chemical
22 Company is a member of the BKK Working Group and as a member of the BKK
23 Working Group has incurred costs, including response costs consistent with the
24 NCP, at the BKK Class I Facility.

25 29. Plaintiff Ducommun Aerostructures, Inc. is a corporation organized
26 under the laws of the State of Delaware. At all times referred to herein, Ducommun
27 Aerostructures, Inc., or its corporate predecessor(s), was and is authorized to do
28 business, and was and is doing business, in California. The State of California has

1 alleged that Plaintiff Ducommun Aerostructures, Inc. arranged for the disposal of a
2 Hazardous Substance at the BKK Class I Facility, as those terms are described in
3 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Ducommun
4 Aerostructures, Inc. is a member of the BKK Working Group and as a member of
5 the BKK Working Group has incurred costs, including response costs consistent
6 with the NCP, at the BKK Class I Facility.

7 30. Plaintiff Essex Chemical Corporation is a corporation organized under
8 the laws of the State of New Jersey. At all times referred to herein, Essex Chemical
9 Corporation, or its corporate predecessor(s), was and is authorized to do business,
10 and was and is doing business, in California. The State of California has alleged
11 that Plaintiff Essex Chemical Corporation arranged for the disposal of a Hazardous
12 Substance at the BKK Class I Facility, as those terms are described in section
13 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Essex Chemical Corporation is
14 a member of the BKK Working Group and as a member of the BKK Working
15 Group has incurred costs, including response costs consistent with the NCP, at the
16 BKK Class I Facility.

17 31. Plaintiff Exxon Mobil Corporation is a corporation organized under
18 the laws of the State of New Jersey. At all times referred to herein, Exxon Mobil
19 Corporation, or its corporate predecessor(s), was and is authorized to do business,
20 and was and is doing business, in California. The State of California has alleged
21 that Plaintiff Exxon Mobil Corporation arranged for the disposal of a Hazardous
22 Substance at the BKK Class I Facility, as those terms are described in section
23 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Exxon Mobil Corporation is a
24 member of the BKK Working Group and as a member of the BKK Working Group
25 has incurred costs, including response costs consistent with the NCP, at the BKK
26 Class I Facility.

27 32. Plaintiff Gemini Industries, Inc. is a corporation organized under the
28 laws of the State of California. At all times referred to herein, Gemini Industries,

1 Inc. or its corporate predecessor(s), was and is authorized to do business, and was
2 and is doing business, in California. The State of California has alleged that
3 Plaintiff Gemini Industries, Inc. arranged for the disposal of a Hazardous Substance
4 at the BKK Class I Facility, as those terms are described in section 107(a) of
5 CERCLA, 42 U.S.C. § 9607(a). Plaintiff Gemini Industries, Inc. is a member of
6 the BKK Working Group. As a member of the BKK Working Group, and also
7 prior to becoming a Member, Gemini Industries, Inc. has incurred costs, including
8 response costs consistent with the NCP, at the BKK Class I Facility.

9 33. Plaintiff General Dynamics Corporation is a corporation organized
10 under the laws of the State of Delaware. During the years of operation of the BKK
11 Class I Landfill, specifically from approximately 1975 until 1984, General
12 Dynamics Corporation was authorized to do business, and was doing business, in
13 California. The State of California has alleged that Plaintiff General Dynamics
14 Corporation arranged for the disposal of a Hazardous Substance at the BKK Class I
15 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
16 9607(a). Plaintiff General Dynamics Corporation is a member of the BKK
17 Working Group and as a member of the BKK Working Group has incurred costs,
18 including response costs consistent with the NCP, at the BKK Class I Facility.

19 34. Plaintiff General Latex and Chemical Corporation is a corporation
20 organized under the laws of the State of Massachusetts. At all times referred to
21 herein, General Latex and Chemical Corporation, or its corporate predecessor(s),
22 was and is authorized to do business, and was and is doing business, in California.
23 The State of California has alleged that Plaintiff General Latex and Chemical
24 Corporation arranged for the disposal of a Hazardous Substance at the BKK Class I
25 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
26 9607(a). Plaintiff General Latex and Chemical Corporation is a member of the
27 BKK Working Group and as a member of the BKK Working Group has incurred
28

1 costs, including response costs consistent with the NCP, at the BKK Class I
2 Facility.

3 35. Plaintiff Hewlett-Packard Company is a corporation organized under
4 the laws of the State of Delaware. At all times referred to herein, Hewlett-Packard
5 Company, or its corporate predecessor(s), was and is authorized to do business, and
6 was and is doing business, in California. The State of California has alleged that
7 Plaintiff Hewlett-Packard Company arranged for the disposal of a Hazardous
8 Substance at the BKK Class I Facility, as those terms are described in section
9 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Hewlett-Packard Company is a
10 member of the BKK Working Group and as a member of the BKK Working Group
11 has incurred costs, including response costs consistent with the NCP, at the BKK
12 Class I Facility.

13 36. Plaintiff American Honda Motor Co., Inc. is a corporation organized
14 under the laws of the State of California. At all times referred to herein, American
15 Honda Motor Co., Inc. was and is authorized to do business, and was and is doing
16 business, in California. The State of California has alleged that Plaintiff American
17 Honda Motor Co., Inc. arranged for the disposal of a Hazardous Substance at the
18 BKK Class I Facility, as those terms are described in section 107(a) of CERCLA,
19 42 U.S.C. § 9607(a). Plaintiff American Honda Motor Co. is a member of the BKK
20 Working Group and as a member of the BKK Working Group has incurred costs,
21 including response costs consistent with the NCP, at the BKK Class I Facility.

22 37. Plaintiff Huntington Beach Company is a corporation organized under
23 the laws of the State of California. At all times referred to herein, Huntington Beach
24 Company, or its corporate predecessor(s), was and is authorized to do business, and
25 was and is doing business, in California. The State of California has alleged that
26 Plaintiff Huntington Beach Company arranged for the disposal of a Hazardous
27 Substance at the BKK Class I Facility, as those terms are described in section
28 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Huntington Beach Company is

1 a member of the BKK Working Group and as a member of the BKK Working
2 Group has incurred costs, including response costs consistent with the NCP, at the
3 BKK Class I Facility.

4 38. Plaintiff Lockheed Martin Corporation is a corporation organized
5 under the laws of the State of Maryland. At all times referred to herein, Lockheed
6 Martin Corporation, or its corporate predecessor(s), was and is authorized to do
7 business, and was and is doing business, in California. The State of California has
8 alleged that Plaintiff Lockheed Martin Corporation arranged for the disposal of a
9 Hazardous Substance at the BKK Class I Facility, as those terms are described in
10 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Lockheed Martin
11 Corporation is a member of the BKK Working Group. As a Member of the BKK
12 Working Group, and also prior to becoming a member, Lockheed Martin
13 Corporation has incurred costs, including response costs consistent with the NCP,
14 at the BKK Class I Facility.

15 39. Plaintiff Mars, Inc. (formerly known as Kal Kan Foods Inc.) is a
16 corporation organized under the laws of the State of Delaware. At all times referred
17 to herein, Mars, Inc., or its corporate predecessor(s), was and is authorized to do
18 business, and was and is doing business, in California. The State of California has
19 alleged that Plaintiff Mars, Inc. arranged for the disposal of a Hazardous Substance
20 at the BKK Class I Facility, as those terms are described in section 107(a) of
21 CERCLA, 42 U.S.C. § 9607(a). Plaintiff Mars, Inc. is a member of the BKK
22 Working Group and as a member of the BKK Working Group has incurred costs,
23 including response costs consistent with the NCP, at the BKK Class I Facility.

24 40. Plaintiff Montrose Chemical Corp. of California is a corporation
25 organized under the laws of the State of Delaware. At all times referred to herein,
26 Montrose Chemical Corp. of California, or its corporate predecessor(s), was and is
27 authorized to do business, and was and is doing business, in California. The State
28 of California has alleged that Plaintiff Montrose Chemical Corp. of California

1 arranged for the disposal of a Hazardous Substance at the BKK Class I Facility, as
2 those terms are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a).
3 Plaintiff Montrose Chemical Corp. of California is a member of the BKK Working
4 Group and as a member of the BKK Working Group has incurred costs, including
5 response costs consistent with the NCP, at the BKK Class I Facility.

6 41. Plaintiff Mortell Company is a corporation organized under the laws of
7 the State of Delaware. At all times referred to herein, Mortell Company or its
8 corporate predecessor(s), was and is authorized to do business, and was and is
9 doing business, in California. The State of California has alleged that Plaintiff
10 Mortell Company arranged for the disposal of a Hazardous Substance at the BKK
11 Class I Facility, as those terms are described in section 107(a) of CERCLA, 42
12 U.S.C. § 9607(a). Plaintiff Mortell Company is a member of the BKK Working
13 Group and as a member of the BKK Working Group has incurred costs, including
14 response costs consistent with the NCP, at the BKK Class I Facility.

15 42. Plaintiff Morton International, Inc. is a corporation organized under
16 the laws of the State of Indiana. At all times referred to herein, Morton
17 International, Inc., or its corporate predecessor(s), was and is authorized to do
18 business, and was and is doing business, in California. The State of California has
19 alleged that Plaintiff Morton International, Inc. arranged for the disposal of a
20 Hazardous Substance at the BKK Class I Facility, as those terms are described in
21 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Morton International,
22 Inc. is a member of the BKK Working Group and as a member of the BKK
23 Working Group has incurred costs, including response costs consistent with the
24 NCP, at the BKK Class I Facility.

25 43. Plaintiff National Steel and Shipbuilding Company is a corporation
26 organized under the laws of the State of Nevada. At all times referred to herein,
27 National Steel and Shipbuilding Company, or its corporate predecessor(s), was and
28 is authorized to do business, and was and is doing business, in California. The

1 State of California has alleged that Plaintiff National Steel and Shipbuilding
2 Company arranged for the disposal of a Hazardous Substance at the BKK Class I
3 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
4 9607(a). Plaintiff National Steel and Shipbuilding Company is a member of the
5 BKK Working Group and as a member of the BKK Working Group has incurred
6 costs, including response costs consistent with the NCP, at the BKK Class I
7 Facility.

8 44. Plaintiff Northrop Grumman Systems Corporation is a corporation
9 organized under the laws of the State of Delaware. At all times referred to herein,
10 Northrop Grumman Systems Corporation, or its corporate predecessor(s), was and
11 is authorized to do business, and was and is doing business, in California. The
12 State of California has alleged that Plaintiff Northrop Grumman Systems
13 Corporation arranged for the disposal of a Hazardous Substance at the BKK Class I
14 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
15 9607(a). Plaintiff Northrop Grumman Systems Corporation is a member of the
16 BKK Working Group and as a member of the BKK Working Group has incurred
17 costs, including response costs consistent with the NCP, at the BKK Class I
18 Facility.

19 45. Plaintiff Oxy USA Inc. is a corporation organized under the laws of
20 the State of Delaware. At all times referred to herein, Oxy USA Inc., or its
21 corporate predecessor(s), was and is authorized to do business, and was and is
22 doing business, in California. The State of California has alleged that Plaintiff Oxy
23 USA Inc. arranged for the disposal of a Hazardous Substance at the BKK Class I
24 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
25 9607(a). Plaintiff Oxy USA Inc. is a member of the BKK Working Group and as a
26 member of the BKK Working Group has incurred costs, including response costs
27 consistent with the NCP, at the BKK Class I Facility
28

1 46. Plaintiff Quemetco, Inc. is a corporation organized under the laws of
2 the State of Delaware. At all times referred to herein, Quemetco, Inc., or its
3 corporate predecessor(s), was and is authorized to do business, and was and is
4 doing business, in California. The State of California has alleged that Plaintiff
5 Quemetco, Inc. arranged for the disposal of a Hazardous Substance at the BKK
6 Class I Facility, as those terms are described in section 107(a) of CERCLA, 42
7 U.S.C. § 9607(a). Plaintiff Quemetco, Inc. is a member of the BKK Working
8 Group and as a member of the BKK Working Group has incurred costs, including
9 response costs consistent with the NCP, at the BKK Class I Facility.

10 47. Plaintiff Rockwell Automation, Inc. is a corporation organized under
11 the laws of the State of Delaware. At all times referred to herein, Rockwell
12 Automation, Inc., or its corporate predecessor(s), was and is authorized to do
13 business, and was and is doing business, in California. The State of California has
14 alleged that Plaintiff Rockwell Automation, Inc. arranged for the disposal of a
15 Hazardous Substance at the BKK Class I Facility, as those terms are described in
16 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Rockwell Automation,
17 Inc. is a member of the BKK Working Group and as a member of the BKK
18 Working Group has incurred costs, including response costs consistent with the
19 NCP, at the BKK Class I Facility.

20 48. Plaintiff Rohm & Haas Company is a corporation organized under the
21 laws of the State of Delaware. At all times referred to herein, Rohm & Haas
22 Company, or its corporate predecessor(s), was and is authorized to do business, and
23 was and is doing business, in California. The State of California has alleged that
24 Plaintiff Rohm & Haas Company arranged for the disposal of a Hazardous
25 Substance at the BKK Class I Facility, as those terms are described in section
26 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Rohm & Haas Company is a
27 member of the BKK Working Group and as a member of the BKK Working Group
28

1 has incurred costs, including response costs consistent with the NCP, at the BKK
2 Class I Facility.

3 49. Plaintiff Rohr, Inc. is a corporation organized under the laws of the
4 State of Delaware. At all times referred to herein, Rohr, Inc., or its corporate
5 predecessor(s), was and is authorized to do business, and was and is doing business,
6 in California. The State of California has alleged that Plaintiff Rohr, Inc. arranged
7 for the disposal of a Hazardous Substance at the BKK Class I Facility, as those
8 terms are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff
9 Rohr, Inc. is a member of the BKK Working Group and as a member of the BKK
10 Working Group has incurred costs, including response costs consistent with the
11 NCP, at the BKK Class I Facility.

12 50. Plaintiff San Diego Gas & Electric Company is a corporation
13 organized under the laws of the State of California. At all times referred to herein,
14 San Diego Gas & Electric Company, or its corporate predecessor(s), was and is
15 authorized to do business, and was and is doing business, in California. The State
16 of California has alleged that Plaintiff San Diego Gas & Electric Company arranged
17 for the disposal of a Hazardous Substance at the BKK Class I Facility, as those
18 terms are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff
19 San Diego Gas & Electric Company is a member of the BKK Working Group and
20 as a member of the BKK Working Group has incurred costs, including response
21 costs consistent with the NCP, at the BKK Class I Facility.

22 51. Plaintiff Smith International, Inc. is a corporation organized under the
23 laws of the State of California. At all times referred to herein, Smith International,
24 Inc., or its corporate predecessor(s), was and is authorized to do business, and was
25 and is doing business, in California. The State of California has alleged that
26 Plaintiff Smith International, Inc. arranged for the disposal of a Hazardous
27 Substance at the BKK Class I Facility, as those terms are described in section
28 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Smith International, Inc. is a

1 member of the BKK Working Group and as a member of the BKK Working Group
2 has incurred costs, including response costs consistent with the NCP, at the BKK
3 Class I Facility

4 52. Plaintiff Southern California Edison Company is a corporation
5 organized under the laws of the State of California. At all times referred to herein,
6 Southern California Edison Company, or its corporate predecessor(s), was and is
7 authorized to do business, and was and is doing business, in California. The State
8 of California has alleged that Plaintiff Southern California Edison Company
9 arranged for the disposal of a Hazardous Substance at the BKK Class I Facility, as
10 those terms are described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a).

11 Plaintiff Southern California Edison Company is a member of the BKK Working
12 Group and as a member of the BKK Working Group has incurred costs, including
13 response costs consistent with the NCP, at the BKK Class I Facility.

14 53. Plaintiff Southern California Gas Company is a corporation organized
15 under the laws of the State of California. At all times referred to herein, Southern
16 California Gas Company, or its corporate predecessor(s), was and is authorized to
17 do business, and was and is doing business, in California. The State of California
18 has alleged that Plaintiff Southern California Gas Company arranged for the
19 disposal of a Hazardous Substance at the BKK Class I Facility, as those terms are
20 described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Southern
21 California Gas Company is a member of the BKK Working Group and as a member
22 of the BKK Working Group has incurred costs, including response costs consistent
23 with the NCP, at the BKK Class I Facility.

24 54. Plaintiff Stauffer Management Company LLC is a limited liability
25 corporation organized under the laws of the State of Delaware. At all times referred
26 to herein, Stauffer Management Company LLC was and is authorized to do
27 business, and was and is doing business, in California. Stauffer Management
28 Company LLC is a contractual indemnitor of Bayer CropScience Inc., and through

1 this legal obligation, has paid the costs incurred by Bayer CropScience, Inc. and has
2 participated in directing remediation efforts as an agent for Bayer CropScience, Inc.
3 at the BKK Class I Facility. Stauffer Management Company LLC also is an
4 assignee to the subrogation and other rights or causes of action Syngenta Crop
5 Protection, LLC, a Delaware limited liability company, may have as a result of
6 reimbursements it has made to Stauffer Management Company LLC for costs paid
7 for by Stauffer Management Company LLC in connection with the BKK Class I
8 Facility. Prior to filing this lawsuit, Bayer CropScience, Inc. and Stauffer
9 Management Company LLC submitted demands to Defendants as contemplated by
10 CERCLA § 112(b) and (c), thereby making them each a “claimant” as that term is
11 used in the statute. Although Stauffer Management Company LLC and Syngenta
12 Crop Protection, LLC are not members of the BKK Working Group, because the
13 costs they have incurred result directly from Bayer CropScience’s participation in
14 the BKK Working Group, for purposes of the allegations in this Ninth Amended
15 Complaint relating to the incurrence of costs, the term “BKK Working Group”
16 includes Stauffer Management Company LLC and Syngenta Crop Protection, LLC.

17 55. Plaintiff The Procter & Gamble Manufacturing Company is a
18 corporation organized under the laws of the State of Ohio. At all times referred to
19 herein, The Procter & Gamble Manufacturing Company, or its corporate
20 predecessor(s), was and is authorized to do business, and was and is doing business,
21 in California. The State of California has alleged that Plaintiff The Procter &
22 Gamble Manufacturing Company arranged for the disposal of a Hazardous
23 Substance at the BKK Class I Facility, as those terms are described in section
24 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff The Procter & Gamble
25 Manufacturing Company is a member of the BKK Working Group and as a
26 member of the BKK Working Group has incurred costs, including response costs
27 consistent with the NCP, at the BKK Class I Facility.

28

1 56. Plaintiff THUMS Long Beach Company is a corporation organized
2 under the laws of the State of Delaware. At all times referred to herein, THUMS
3 Long Beach Company, or its corporate predecessor(s), was and is authorized to do
4 business, and was and is doing business, in California. The State of California has
5 alleged that Plaintiff THUMS Long Beach Company arranged for the disposal of a
6 Hazardous Substance at the BKK Class I Facility, as those terms are described in
7 section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff THUMS Long Beach
8 Company is a member of the BKK Working Group and as a member of the BKK
9 Working Group has incurred costs, including response costs consistent with the
10 NCP, at the BKK Class I Facility.

11 57. Plaintiff Union Carbide Corporation is a corporation organized under
12 the laws of the State of New York. At all times referred to herein, Union Carbide
13 Corporation, or its corporate predecessor(s), was and is authorized to do business,
14 and was and is doing business, in California. The State of California has alleged
15 that Plaintiff Union Carbide Corporation arranged for the disposal of a Hazardous
16 Substance at the BKK Class I Facility, as those terms are described in section
17 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Union Carbide Corporation is a
18 member of the BKK Working Group and as a member of the BKK Working Group
19 has incurred costs, including response costs consistent with the NCP, at the BKK
20 Class I Facility.

21 58. Plaintiff Union Pacific Railroad (formerly known as Southern Pacific
22 Transportation Company) is a corporation organized under the laws of the State of
23 Delaware. At all times referred to herein, Union Pacific Railroad, or its corporate
24 predecessor(s), was and is authorized to do business, and was and is doing business,
25 in California. The State of California has alleged that Plaintiff Union Pacific
26 Railroad arranged for the disposal of a Hazardous Substance at the BKK Class I
27 Facility, as those terms are described in section 107(a) of CERCLA, 42 U.S.C. §
28 9607(a). Plaintiff Union Pacific Railroad is a member of the BKK Working Group

1 and as a member of the BKK Working Group has incurred costs, including
2 response costs consistent with the NCP, at the BKK Class I Facility.

3 59. Plaintiff United States Steel Corporation is a corporation organized
4 under the laws of the State of Delaware. At all times referred to herein, United
5 States Steel Corporation, or its corporate predecessor(s), was and is authorized to
6 do business, and was and is doing business, in California. The State of California
7 has alleged that Plaintiff United States Steel Corporation arranged for the disposal
8 of a Hazardous Substance at the BKK Class I Facility, as those terms are described
9 in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff United States Steel
10 Corporation is a member of the BKK Working Group and as a member of the BKK
11 Working Group has incurred costs, including response costs consistent with the
12 NCP, at the BKK Class I Facility.

13 60. Plaintiff RTX Corporation is a corporation organized under the laws of
14 the State of Delaware. At all times referred to herein, RTX Corporation, or its
15 corporate predecessor(s), was and is authorized to do business, and was and is
16 doing business, in California. The State of California has alleged that Plaintiff
17 RTX Corporation arranged for the disposal of a Hazardous Substance at the BKK
18 Class I Facility, as those terms are described in section 107(a) of CERCLA, 42
19 U.S.C. § 9607(a). Plaintiff RTX Corporation is a member of the BKK Working
20 Group and as a member of the BKK Working Group has incurred costs, including
21 response costs consistent with the NCP, at the BKK Class I Facility.

22 61. Plaintiff Univar Solutions USA LLC (f/k/a Univar Solutions USA Inc.
23 and Van Waters & Rogers) is a corporation organized under the laws of the State of
24 Washington. At all times referred to herein, Univar Solutions USA Inc., or its
25 corporate predecessor(s), was and is authorized to do business, and was and is
26 doing business, in California. The State of California has alleged that Plaintiff
27 Univar USA LLC arranged for the disposal of a Hazardous Substance at the BKK
28 Class I Facility, as those terms are described in section 107(a) of CERCLA, 42

1 U.S.C. § 9607(a). Plaintiff Univar Solutions USA LLC is a member of the BKK
2 Working Group and as a member of the BKK Working Group has incurred costs,
3 including response costs consistent with the NCP, at the BKK Class I Facility.

4 62. Plaintiff Ameron International Corporation is a corporation organized
5 under the laws of the State of Delaware. At all times referred to herein, Ameron
6 International Corporation, or its corporate predecessor(s), was and is authorized to
7 do business, and was and is doing business, in California. The State of California
8 has alleged that Plaintiff Ameron International Corporation arranged for the
9 disposal of a Hazardous Substance at the BKK Class I Facility, as those terms are
10 described in section 107(a) of CERCLA, 42 U.S.C. § 9607(a). Plaintiff Ameron
11 International Corporation is a member of the BKK Working Group and as a
12 member of the BKK Working Group has incurred costs, including response costs
13 consistent with the NCP, at the BKK Class I Facility.

14 63. Plaintiff Xerox Corporation is a corporation organized under the laws
15 of the State of New York. At all times referred to herein, Xerox Corporation, or its
16 corporate predecessor(s), was and is authorized to do business, and was and is
17 doing business, in California. The State of California has alleged that Plaintiff
18 Xerox Corporation arranged for the disposal of a Hazardous Substance at the BKK
19 Class I Facility, as those terms are described in section 107(a) of CERCLA, 42
20 U.S.C. § 9607(a). Plaintiff Xerox Corporation is a member of the BKK Working
21 Group and as a member of the BKK Working Group has incurred costs, including
22 response costs consistent with the NCP, at the BKK Class I Facility.

23 **DEFENDANTS**

24 64. Defendants are: A.B. Dick Co.; Aamco Transmissions; AAR Corp.;
25 Abbott Power Corp.; Ace Industries; ACH Food Companies, Inc.; Advanced
26 Coating Inc.; Aerosol Services Co. Inc.; Air Industries Corp.; Air Liquide America
27 LP; Airport Consult Group LLC; Albertsons Companies, Inc.; Alco Cad Nickel
28 Plating Corp.; Alco Well Service Inc.; Alkid Corporation; Alpha Corporation;

1 Aluminum Precision Products Inc.; American Appliance Manufacturing Corp.;
2 American Can Company; American Chemical & Refining; American Pacific
3 International Inc.; American Scientific Products; American Tool & Engineering
4 Corp.; Ameripride Services, LLC; AMF Tubescope Inc.; Anchor Post Products
5 Inc.; Anco Metal Improvement Co.; Andrew California Corp.; Anodyne Inc.; Apex
6 International Alloys; Apollo Manufacturing Co.; Applied Magnetics Corp.; Ardagh
7 Group S.A.; Argo Petroleum Corp.; Arrowhead Mountain Spring Water Company;
8 Armstrong World Industries, Inc.; Arnold Circuits, Inc.; Arnold Electronics Inc.;
9 Arnold Engineering Co.; Atlas Fabricators; Atomica Corp.; Aurum Industries, Inc.;
10 Axel Johnson, Inc.; B. Jadow and Sons, Inc.; B.P. John Furniture Co.; BAE
11 Systems San Diego Ship Repair Inc.; Balser Trucking; Barry Wright Controls;
12 Bausch Health Americas, Inc.; Baxter International Inc.; Beatrice Hunt Wesson
13 Inc.; Beazer East, Inc; Beckman Coulter Inc.; Becton, Dickinson and Company;
14 Bernard Epps & Co.; Bethlehem Steel Corp.; Beverly Hills Oil Company; BFI XV
15 Realty Fund Ltd.; Big Three Industries Inc.; Birtcher Pacific; Blue Triton Brands,
16 Inc.; Bostik, Inc.; BPJ International, Inc.; Bridgestone Americas, Inc.; Brooks &
17 Perkins Brownline Division; Byron Jackson Pumps; C&D Technologies, Inc.; Cal
18 Chem Cleaning Co.; Cal Nev Pipeline Co.; Cal Style Furniture Manufacturing Co.;
19 Cali-Blok; Calbiochem-Behring Corp.; California Carpet Co.; Calprotech Inc.;
20 Capital Parade USA, Inc.; Cargill Inc.; Carrier Corporation; Cerro Corporation;
21 CHB Foods; Cia Minera De Cananea SA; Circuit One Div. of LH Research Inc.;
22 Cleveland Wrecking Co.; Coast Plating, Inc.; Cognis Corp.; Columbia Pictures;
23 Conagra Brands, Inc.; Control Components Inc.; Cragar Industries; Crain Western,
24 Inc.; CRE Liquidation LLC; Crockett Container Corp.; Crowley Inc.; Crown
25 Beverage Packaging; Crown Central LLC; Crown Central Petroleum Corporation;
26 Crown Disposal Inc.; Crown Zellerbach Co.; CSX Transportation; Cummins
27 Service & Sales Inc.; Cyclo Chemical Co.; Cytec Industries Inc.; Daiwa Corp.;
28 Darnell Corporate Ltd.; Data Products Corp.; Davis Investment Co.; Decratrend

1 Corp.; Densco Products and Services Americas, Inc.; Desoto Inc.; Devon Energy
2 Corp.; Disposal Control; Don Kott Ford; Douglas Furniture of California; Dowty
3 Propellers Americas; Drackett Co.; Dresser Industries, Inc.; Durex Inc.; E.T.C.
4 Carpet Mills, Ltd.; East Coast Oceanview, LLC; El Fab; Electrofilm Inc.;
5 Electronic Materials Corp.; Electrotech Circuits Inc.; Elevate Textiles; EME Corp.;
6 Emerald Equities; Emerson Electric Co.; Emery Industries Inc.; Employbridge
7 LLC; Emrise Electronics Corp.; Energy Development Co. Inc.; Environmental
8 Control Systems Inc.; Epec Oil Co. Liquidating Trust; Fairchild Industries; Federal
9 Express Corporation; Federal Reserve Bank; Fiberite West Coast Corp.; Firestone
10 Tire & Rubber Co.; Fletcher Oil & Refining Co.; Flight Accessory Service;
11 Flowserve Corporation; Fotomat Labs Inc.; Flying Tigers Line; Franciscan
12 Ceramics Inc.; Frazee Industries; Friction Inc.; Friction Materials Corp.; FMC
13 Corporation; Ford Aerospace and Communications Corp.; Fort James LLC; Foster-
14 Forbes Glass Co.; Frontier California, Inc.; Gates Admiral; GATX; GATX Corp.;
15 GATX Terminals Corp.; GE Betz, Inc.; General Battery Corp.; General Mills, Inc.;
16 General Telephone Co.; Genstar Building Materials Co.; Genstar Roofing Products
17 Company, Inc.; Georgia-Pacific LLC; Gerald California LLC; Gerald Metals, Inc.;
18 Glass Containers Corp.; Glasteel; Global Tube Corporation; Gray Truck Lines;
19 Greer Hydraulics Inc.; Grupo Mexico SAB de CV; Guaranteed Products Inc.; GWB
20 (US), Inc.; Hallmark Circuits Inc.; Halstead Enterprises; Handy & Harman; Harsco
21 Corporation; Hawker Pacific Aerospace; Heinz Foods; Heist Maintenance Services
22 Inc.; Henry Soss & Co. Inc.; Hess Corporation; Hill Brothers Chemical Co.;
23 Hillcrest Beverly Oil Corp.; Hi-Shear Corp.; Hoffman Electronics; Hollytex Carpet
24 Mills, Inc.; Howmet Aerospace Inc.; Hoya Corporation USA; HR Textron Inc.;
25 HTW Industries Inc.; Humco Products; Hutchinson Aerospace & Industry, Inc.;
26 Hydraulic Units Inc.; ICN Pharmaceuticals; ICX Industries, Inc.; ICX National,
27 Inc.; Imco Services; IMI Critical Engineering LLC; Industrial Circuits; Industrial
28 Insulations Incorporated; Industrial Tectonics Bearings; Inland Container Corp.;

1 Inland Paperboard and Packaging, Inc.; International Polymer Corp.; I.T. Corp.;
2 ITT LLC; J.C. Inc.; JCI Environmental Services; JCX; Jeld-Wen, Inc.; Jersey Maid
3 Milk Products Inc.; Johnson Controls Inc.; Johnston Pump Co.; Jonathan
4 Manufacturing Corp.; Joslyn Manufacturing & Supply Co.; Kaiser Foundation
5 Health Plan, Inc.; Kaiser Rollmet Inc.; Kaynar Manufacturing Co.; Kerr-McGee
6 Chemical Worldwide LLC; Keuffel & Esser Co.; Kinder Morgan Energy Partners,
7 L.P.; Knudsen Corp.; Konica Photo Service U.S.A., Inc.; Korbel Capital LLC;
8 Krazy Glue Inc.; L'Oreal USA, Inc.; Lanxess Corporation; Liquid Waste
9 Management; Lisi Aerospace North America, Inc.; Long Beach Fabricators Inc.;
10 Lonza Inc.; Loral Space & Communications Inc.; Los Angeles Gauge Co.; Los
11 Angeles Plating Co.; Lucky Stores Inc.; Lumidor Manufacturing Co.; M-I L.L.C.
12 *aka* and/or *dba* M-I Swaco; Macdermid Printing Solutions; Mack Trucks Inc.;
13 Maersk Line, Limited (MLL); Marco Chemical Co.; Marten Management Co.;
14 Maxwell Laboratories Inc.; Mazda Motor of America, Inc.; Mazda North America;
15 MCA Laboratories; McKay Chemical Co.; Mead Johnson & Company; Mercury
16 Aerospace Inc.; Mercury Aerospace Fasteners; Merel Co. Inc.; Metal Box Can;
17 MGF Industries; Mr. Gasket Company; MRC Holdings, Inc.; Narco Chemical;
18 Narco Corporation; Narmco Materials Inc.; National Oilwell Varco; NavCom
19 Defense Electronics, Inc.; Newell Brands Inc.; New Fashion Cleaners;
20 Nippondenso of Los Angeles; North American Car Corp.; North American
21 Environmental; Northrop Pacific; Norwest Equity Partners; Novartis Corp.; Old
22 Quaker Paint Co.; Orange County Sanitation District; Oryx Energy Company;
23 Pacific Anchor Chemical Corp.; Pacific Intermountain Express; Pacific Southwest
24 Airlines; Packaging Corp. of America; Pactiv LLC; Paint & Coatings Corp.; Panel
25 Air Corp.; Parsons Corporation; Pauley Petroleum Co.; PCC Rollmet, Inc.; Peairs
26 Engineers; Peat Manufacturing Co.; Penske Logistics Corp.; Per-Olof Loof Family
27 Foundation, Inc.; Pervo International, Inc.; Pervo Paint Company; PGP Industries
28 Inc.; Pillsbury Co.; PRC-DeSoto International Inc.; Pre Delivery Service; Precision

1 Castparts Corp.; Price Pfister *nka* Pfister; Printed Circuits, Inc.; Products Research
2 & Chemical Corp.; Proto Tool; Pure Source LLC; Purex Corp.; Purex Industries,
3 Inc.; Ralph M. Parsons Co.; Redken Laboratories Inc.; Register Properties Inc.;
4 Reisner Metals; Replacement Parts Manufacturing; Rexam Beverage Can
5 Company; Ricoh Electronics, Inc.; Ricoh Printing Systems America Inc.; Rio Tinto
6 Alcan Inc.; Roberts Manufacturing Co.; Royal Aluminum Co.; Ryder System, Inc.;
7 Roller Bearing Company of America, Inc.; S.C. Johnson & Son, Inc.; San Diego
8 Pipe Line Co.; Safeway Stores Inc.; San Fernando Laboratories; Sandia Metal
9 Process, Inc.; Sargent Fletcher Inc.; Sargent Industries; Schlumberger, Ltd.;
10 Schlumberger N.V.; Sea Land Service Inc.; Service Chemical Co.; Shuwa
11 Investments Corp.; Smith & Co.; Somacis Inc.; Sony Pictures Entertainment Inc.;
12 South West Forest Products; Southern California Chemical; Southern Pacific Pipe
13 Lines, Inc.; Southwest Steel Rolling Mills; Southwestern Engineering; Standard
14 Industrial Towel & Uniform; Standard Motor Products, Inc.; Stanley Black &
15 Decker, Inc.; Structural Composite Industries; Sun Exploration; Sun Capital
16 Partners, Inc.; Sweco, Inc.; T.P. Industrial Inc.; TDY Industries, LLC; Telair US
17 LLC; Tenneco Inc.; Tenneco Oil Co.; Tesla, Inc.; The Save Mart Companies, LLC;
18 Thompson Industries; Thorpe Insulation Co.; Times Mirror Press; Tooley & Co.
19 Inc.; Toppan Printing Company (America), Inc.; Toyota Motor Manufacturing
20 USA; Trammel Crow Company; Transequip Pacific Inc.; TRE Corp.; Treatolite
21 Corp.; Tribune Publishing Company; TriMas Corporation; Triumph Group
22 Operations; Trizec Properties; Trojan Battery Co.; TRZ Holdings LLC; Turkish
23 Products, Inc.; U.S. Borax & Chemical Corp.; Truck Transport; U.S. Brass
24 Division; U.S. Filters; U.S. Reduction Co.; Ultramar Inc.; United Coatings Inc.;
25 Valco; Valentec International Corp.; Valero Energy Corporation; Van De Kamp;
26 Varco International; Veolia Environmental Services North America, LLC; Verizon
27 New York Inc.; Vest, Inc.; VF Corporation; Vons Companies Inc.; Vought Aircraft
28 Industries Inc.; WM Healthcare Solutions, Inc.; W. Smith Co.; W. Smith Co.

1 Container Reconditioning; Weber Aircraft; Wells Fargo Rail Corporation; Wells
2 Marine Inc.; Weslock Corp.; West Valley Toyota; Western Kraft Corp.; Western
3 Lithograph; Western Synthetic Felt Co.; Westminster Ceramics Inc.; Whittaker
4 Corp.; Windowmaster Products; Woodward HRT, Inc.; Xtra Energy; Yoplait USA;
5 Zimmers Truck Stop; and Does 1-10.

6 65. According to historical BKK Corp. records, Defendant A. B. Dick Co.
7 contributed manifested waste to the BKK Class I Facility. This manifested waste
8 contained Hazardous Substances that Defendant A. B. Dick Co. generated and/or
9 arranged for its disposal at the BKK Class I Facility. To date, Defendant A. B.
10 Dick Co. has not incurred any response costs at the BKK Class I Facility nor has it
11 paid its fair share of response costs incurred by the Plaintiffs at the BKK Class I
12 Facility.

13 66. According to historical BKK Corp. records, Defendant Aamco
14 Transmissions contributed manifested waste to the BKK Class I Facility. This
15 manifested waste contained Hazardous Substances that Defendant Aamco
16 Transmissions generated and/or arranged for its disposal at the BKK Class I
17 Facility. To date, Defendant Aamco Transmissions has not incurred any response
18 costs at the BKK Class I Facility nor has it paid its fair share of response costs
19 incurred by the Plaintiffs at the BKK Class I Facility.

20 67. Upon information and belief, Defendant AAR Corp. is the successor to
21 Brooks & Perkins Brownline Division and/or otherwise liable for manifested waste
22 that was contributed to the BKK Class I Facility by Brooks & Perkins Brownline
23 Division. According to historical BKK Corp. records, Brooks & Perkins Brownline
24 Division contributed manifested waste to the BKK Class I Facility. This manifested
25 waste contained Hazardous Substances that Brooks & Perkins Brownline Division
26 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
27 Defendant AAR Corp. has not incurred any response costs at the BKK Class I
28 Facility nor has it paid its fair share of response costs incurred by the Plaintiffs at

1 the BKK Class I Facility.

2 68. According to historical BKK Corp. records, Defendant Abbott Power
3 Corp. contributed manifested waste to the BKK Class I Facility. This manifested
4 waste contained Hazardous Substances that Defendant Abbott Power Corp.
5 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
6 Defendant Abbott Power Corp. has not incurred any response costs at the BKK
7 Class I Facility nor has it paid its fair share of response costs incurred by the
8 Plaintiffs at the BKK Class I Facility.

9 69. According to historical BKK Corp. records, Defendant Ace Industries
10 contributed manifested waste to the BKK Class I Facility. This manifested waste
11 contained Hazardous Substances that Defendant Ace Industries generated and/or
12 arranged for its disposal at the BKK Class I Facility. To date, Defendant Ace
13 Industries has not incurred any response costs at the BKK Class I Facility nor has it
14 paid its fair share of response costs incurred by the Plaintiffs at the BKK Class I
15 Facility.

16 70. Upon information and belief, Defendant ACH Food Companies, Inc. is
17 the successor to Humco Products and/or otherwise liable for manifested waste that
18 was contributed to the BKK Class I Facility by Humco Products. According to
19 historical BKK Corp. records, Humco Products contributed manifested waste to the
20 BKK Class I Facility. This manifested waste contained Hazardous Substances that
21 Humco Products generated and/or arranged for its disposal at the BKK Class I
22 Facility. To date, Defendant ACH Food Companies, Inc. has not incurred any
23 response costs at the BKK Class I Facility nor has it paid its fair share of response
24 costs incurred by the Plaintiffs at the BKK Class I Facility.

25 71. According to historical BKK Corp. records, Defendant Advanced
26 Coating Inc. contributed manifested waste to the BKK Class I Facility. This
27 manifested waste contained Hazardous Substances that Defendant Advanced
28 Coating Inc. generated and/or arranged for its disposal at the BKK Class I Facility.

1 To date, Defendant Advanced Coating Inc. has not incurred any response costs at
2 the BKK Class I Facility nor has it paid its fair share of response costs incurred by
3 the Plaintiffs at the BKK Class I Facility.

4 72. According to historical BKK Corp. records, Defendant Aerosol
5 Services Co. Inc. contributed manifested waste to the BKK Class I Facility. This
6 manifested waste contained Hazardous Substances that Defendant Aerosol Services
7 Co. Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To
8 date, Defendant Aerosol Services Co. Inc. has not incurred any response costs at the
9 BKK Class I Facility nor has it paid its fair share of response costs incurred by the
10 Plaintiffs at the BKK Class I Facility.

11 73. According to historical BKK Corp. records, Defendant Air Industries
12 Corp. contributed manifested waste to the BKK Class I Facility. This manifested
13 waste contained Hazardous Substances that Defendant Air Industries Corp.
14 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
15 Defendant Air Industries Corp. has not incurred any response costs at the BKK
16 Class I Facility nor has it paid its fair share of response costs incurred by the
17 Plaintiffs at the BKK Class I Facility.

18 74. Upon information and belief, Defendant Air Liquide America LP is the
19 successor to Big Three Industries Inc. and/or otherwise liable for manifested waste
20 that was contributed to the BKK Class I Facility by Big Three Industries Inc.
21 According to historical BKK Corp. records, Big Three Industries Inc. contributed
22 manifested waste to the BKK Class I Facility. This manifested waste contained
23 Hazardous Substances that Big Three Industries Inc. generated and/or arranged for
24 its disposal at the BKK Class I Facility. To date, Defendant Air Liquide America
25 LP has not incurred any response costs at the BKK Class I Facility nor has it paid
26 its fair share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

27 75. Upon information and belief, Defendant Airport Consult Group LLC is
28 the successor to Cal Style Furniture Manufacturing Co. and/or otherwise liable for

1 manifested waste that was contributed to the BKK Class I Facility by Cal Style
2 Furniture Manufacturing Co. According to historical BKK Corp. records, Cal Style
3 Furniture Manufacturing Co. contributed manifested waste to the BKK Class I
4 Facility. This manifested waste contained Hazardous Substances that Cal Style
5 Furniture Manufacturing Co. generated and/or arranged for its disposal at the BKK
6 Class I Facility. To date, Defendant Airport Consult Group LLC has not incurred
7 any response costs at the BKK Class I Facility nor has it paid its fair share of
8 response costs incurred by the Plaintiffs at the BKK Class I Facility.

9 76. Upon information and belief, Defendant Albertsons Companies, Inc. is
10 the successor to Albertson's Inc. and/or Lucky Stores Inc. and/or otherwise liable
11 for manifested waste that was contributed to the BKK Class I Facility by
12 Albertson's Inc. and/or Lucky Stores Inc. According to historical BKK Corp.
13 records, Albertson's Inc. and Lucky Stores Inc. contributed manifested waste to the
14 BKK Class I Facility. This manifested waste contained Hazardous Substances that
15 Albertson's Inc. and Lucky Stores Inc. generated and/or arranged for its disposal at
16 the BKK Class I Facility. To date, Defendant Albertsons Companies, Inc. has not
17 incurred any response costs at the BKK Class I Facility nor has it paid its fair share
18 of response costs incurred by the Plaintiffs at the BKK Class I Facility.

19 77. According to historical BKK Corp. records, Defendant Alco Cad
20 Nickel Plating Corp. contributed manifested waste to the BKK Class I Facility.
21 This manifested waste contained Hazardous Substances that Defendant Alco Cad
22 Nickel Plating Corp. generated and/or arranged for its disposal at the BKK Class I
23 Facility. To date, Defendant Alco Cad Nickel Plating Corp. has not incurred any
24 response costs at the BKK Class I Facility nor has it paid its fair share of response
25 costs incurred by the Plaintiffs at the BKK Class I Facility.

26 78. According to historical BKK Corp. records, Defendant Alco Well
27 Service Inc. contributed manifested waste to the BKK Class I Facility. This
28 manifested waste contained Hazardous Substances that Defendant Alco Well

1 Service Inc. generated and/or arranged for its disposal at the BKK Class I Facility.
2 To date, Defendant Alco Well Service Inc. has not incurred any response costs at
3 the BKK Class I Facility nor has it paid its fair share of response costs incurred by
4 the Plaintiffs at the BKK Class I Facility.

5 79. Upon information and belief, Defendant Alkid Corporation is the
6 successor to Peat Manufacturing Co. and/or Cragar Industries and/or otherwise
7 liable for manifested waste that was contributed to the BKK Class I Facility by Peat
8 Manufacturing Co. and/or Cragar Industries. According to historical BKK Corp.
9 records, Peat Manufacturing Co. and Cragar Industries contributed manifested
10 waste to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Peat Manufacturing Co. and Cragar Industries generated and/or
12 arranged for its disposal at the BKK Class I Facility. To date, Defendant Alkid
13 Corporation has not incurred any response costs at the BKK Class I Facility nor has
14 it paid its fair share of response costs incurred by the Plaintiffs at the BKK Class I
15 Facility.

16 80. Upon information and belief, Defendant Alpha Corporation is the
17 successor to Glasteel and/or otherwise liable for manifested waste that was
18 contributed to the BKK Class I Facility by Glasteel. According to historical BKK
19 Corp. records, Glasteel contributed manifested waste to the BKK Class I Facility.
20 This manifested waste contained Hazardous Substances that Glasteel generated
21 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
22 Alpha Corporation has not incurred any response costs at the BKK Class I Facility
23 nor has it paid its fair share of response costs incurred by the Plaintiffs at the BKK
24 Class I Facility.

25 81. According to historical BKK Corp. records, Defendant Aluminum
26 Precision Products Inc. contributed manifested waste to the BKK Class I Facility.
27 This manifested waste contained Hazardous Substances that Defendant Aluminum
28 Precision Products Inc. generated and/or arranged for its disposal at the BKK Class

1 I Facility. To date, Defendant Aluminum Precision Products Inc. has not incurred
2 any response costs at the BKK Class I Facility nor has it paid its fair share of
3 response costs incurred by the Plaintiffs at the BKK Class I Facility.

4 82. According to historical BKK Corp. records, Defendant American
5 Appliance Manufacturing Corp. contributed manifested waste to the BKK Class I
6 Facility. This manifested waste contained Hazardous Substances that Defendant
7 American Appliance Manufacturing Corp. generated and/or arranged for its
8 disposal at the BKK Class I Facility. To date, Defendant American Appliance
9 Manufacturing Corp. has not incurred any response costs at the BKK Class I
10 Facility nor has it paid its fair share of response costs incurred by the Plaintiffs at
11 the BKK Class I Facility.

12 83. According to historical BKK Corp. records, Defendant American Can
13 Company contributed manifested waste to the BKK Class I Facility. This
14 manifested waste contained Hazardous Substances that Defendant American Can
15 Company generated and/or arranged for its disposal at the BKK Class I Facility.
16 To date, Defendant American Can Company has not incurred any response costs at
17 the BKK Class I Facility nor has it paid its fair share of response costs incurred by
18 the Plaintiffs at the BKK Class I Facility.

19 84. According to historical BKK Corp. records, Defendant American
20 Chemical & Refining contributed manifested waste to the BKK Class I Facility.
21 This manifested waste contained Hazardous Substances that Defendant American
22 Chemical & Refining generated and/or arranged for its disposal at the BKK Class I
23 Facility. To date, Defendant American Chemical & Refining has not incurred any
24 response costs at the BKK Class I Facility nor has it paid its fair share of response
25 costs incurred by the Plaintiffs at the BKK Class I Facility.

26 85. According to historical BKK Corp. records, Defendant American
27 Pacific International Inc. contributed manifested waste to the BKK Class I Facility.
28 This manifested waste contained Hazardous Substances that Defendant American

1 Pacific International Inc. generated and/or arranged for its disposal at the BKK
2 Class I Facility. To date, Defendant American Pacific International Inc. has not
3 incurred any response costs at the BKK Class I Facility nor has it paid its fair share
4 of response costs incurred by the Plaintiffs at the BKK Class I Facility.

5 86. According to historical BKK Corp. records, Defendant American
6 Scientific Products contributed manifested waste to the BKK Class I Facility. This
7 manifested waste contained Hazardous Substances that Defendant American
8 Scientific Products generated and/or arranged for its disposal at the BKK Class I
9 Facility. To date, Defendant American Scientific Products has not incurred any
10 response costs at the BKK Class I Facility nor has it paid its fair share of response
11 costs incurred by the Plaintiffs at the BKK Class I Facility.

12 87. According to historical BKK Corp. records, Defendant American Tool
13 & Engineering Corp. contributed manifested waste to the BKK Class I Facility.
14 This manifested waste contained Hazardous Substances that Defendant American
15 Tool & Engineering Corp. generated and/or arranged for its disposal at the BKK
16 Class I Facility. To date, Defendant American Tool & Engineering Corp. has not
17 incurred any response costs at the BKK Class I Facility nor has it paid its fair share
18 of response costs incurred by the Plaintiffs at the BKK Class I Facility.

19 88. Upon information and belief, Defendant Ameripride Services, LLC is
20 the successor to Gates Admiral and/or New Fashion Cleaners and/or otherwise
21 liable for manifested waste that was contributed to the BKK Class I Facility by
22 Gates Admiral and/or New Fashion Cleaners. According to historical BKK Corp.
23 records, Gates Admiral and New Fashion Cleaners contributed manifested waste to
24 the BKK Class I facility. This manifested waste contained Hazardous Substances
25 that Gates Admiral and New Fashion Cleaners generated and/or arranged for its
26 disposal at the BKK Class I Facility. To date, Ameripride Services, LLC has not
27 incurred any response costs at the BKK Class I Facility nor has it paid its fair share
28 of response costs incurred by the Plaintiffs at the BKK Class I Facility.

1 89. According to historical BKK Corp. records, Defendant AMF
2 Tubescope Inc. contributed manifested waste to the BKK Class I Facility. This
3 manifested waste contained Hazardous Substances that Defendant AMF Tubescope
4 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
5 Defendant AMF Tubescope Inc. has not incurred any response costs at the BKK
6 Class I Facility nor has it paid its fair share of response costs incurred by the
7 Plaintiffs at the BKK Class I Facility.

8 90. According to historical BKK Corp. records, Defendant Anchor Post
9 Products Inc. contributed manifested waste to the BKK Class I Facility. This
10 manifested waste contained Hazardous Substances that Defendant Anchor Post
11 Products Inc. generated and/or arranged for its disposal at the BKK Class I Facility.
12 To date, Defendant Anchor Post Products Inc. has not incurred any response costs
13 at the BKK Class I Facility nor has it paid its fair share of response costs incurred
14 by the Plaintiffs at the BKK Class I Facility.

15 91. According to historical BKK Corp. records, Defendant Anco Metal
16 Improvement Co. contributed manifested waste to the BKK Class I Facility. This
17 manifested waste contained Hazardous Substances that Defendant Anco Metal
18 Improvement Co. generated and/or arranged for its disposal at the BKK Class I
19 Facility. To date, Defendant Anco Metal Improvement Co. has not incurred any
20 response costs at the BKK Class I Facility nor has it paid its fair share of response
21 costs incurred by the Plaintiffs at the BKK Class I Facility.

22 92. According to historical BKK Corp. records, Defendant Andrew
23 California Corp. contributed manifested waste to the BKK Class I Facility. This
24 manifested waste contained Hazardous Substances that Defendant Andrew
25 California Corp. generated and/or arranged for its disposal at the BKK Class I
26 Facility. To date, Defendant Andrew California Corp. has not incurred any
27 response costs at the BKK Class I Facility nor has it paid its fair share of response
28 costs incurred by the Plaintiffs at the BKK Class I Facility.

1 93. According to historical BKK Corp. records, Defendant Anodyne Inc.
2 contributed manifested waste to the BKK Class I Facility. This manifested waste
3 contained Hazardous Substances that Defendant Anodyne Inc. generated and/or
4 arranged for its disposal at the BKK Class I Facility. To date, Defendant Anodyne
5 Inc. has not incurred any response costs at the BKK Class I Facility nor has it paid
6 its fair share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

7 94. According to historical BKK Corp. records, Defendant Apex
8 International Alloys contributed manifested waste to the BKK Class I Facility. This
9 manifested waste contained Hazardous Substances that Defendant Apex
10 International Alloys generated and/or arranged for its disposal at the BKK Class I
11 Facility. To date, Defendant Apex International Alloys has not incurred any
12 response costs at the BKK Class I Facility nor has it paid its fair share of response
13 costs incurred by the Plaintiffs at the BKK Class I Facility.

14 95. According to historical BKK Corp. records, Defendant Apollo
15 Manufacturing Co. contributed manifested waste to the BKK Class I Facility. This
16 manifested waste contained Hazardous Substances that Defendant Apollo
17 Manufacturing Co. generated and/or arranged for its disposal at the BKK Class I
18 Facility. To date, Defendant Apollo Manufacturing Co. has not incurred any
19 response costs at the BKK Class I Facility nor has it paid its fair share of response
20 costs incurred by the Plaintiffs at the BKK Class I Facility.

21 96. According to historical BKK Corp. records, Defendant Applied
22 Magnetics Corp. contributed manifested waste to the BKK Class I Facility. This
23 manifested waste contained Hazardous Substances that Defendant Applied
24 Magnetics Corp. generated and/or arranged for its disposal at the BKK Class I
25 Facility. To date, Defendant Applied Magnetics Corp. has not incurred any
26 response costs at the BKK Class I Facility nor has it paid its fair share of response
27 costs incurred by the Plaintiffs at the BKK Class I Facility.

28 97. Upon information and belief, Defendant Ardagh Group S.A. is the

1 successor to Saint-Gobain and/or Foster-Forbes Glass Co. and/or is otherwise liable
2 for manifested waste that was contributed to the BKK Class I Facility by Saint-
3 Gobain and/or Foster-Forbes Glass Co. According to historical BKK Corp.
4 records, both Saint-Gobain and Foster-Forbes Glass Co. contributed manifested
5 waste to the BKK Class I Facility. This manifested waste contained Hazardous
6 Substances that Saint-Gobain and Foster-Forbes Glass Co. each generated and/or
7 arranged for its disposal at the BKK Class I Facility. To date, Defendant Ardagh
8 Group S.A. has not incurred any response costs at the BKK Class I Facility nor has
9 it paid its fair share of response costs incurred by the Plaintiffs at the BKK Class I
10 Facility.

11 98. According to historical BKK Corp. records, Defendant Argo
12 Petroleum Corp. contributed manifested waste to the BKK Class I Facility. This
13 manifested waste contained Hazardous Substances that Defendant Argo Petroleum
14 Corp. generated and/or arranged for its disposal at the BKK Class I Facility. To
15 date, Defendant Argo Petroleum Corp. has not incurred any response costs at the
16 BKK Class I Facility nor has it paid its fair share of response costs incurred by the
17 Plaintiffs at the BKK Class I Facility.

18 99. According to historical BKK Corp. records, Defendant Arrowhead
19 Mountain Spring Water Company contributed manifested waste to the BKK Class I
20 Facility. This manifested waste contained Hazardous Substances that Defendant
21 Arrowhead Mountain Spring Water Company generated and/or arranged for its
22 disposal at the BKK Class I Facility. To date, Defendant Arrowhead Mountain
23 Spring Water Company has not incurred any response costs at the BKK Class I
24 Facility nor has it paid its fair share of response costs incurred by the Plaintiffs at
25 the BKK Class I Facility.

26 100. According to historical BKK Corp. records, Defendant Armstrong
27 World Industries, Inc. contributed manifested waste to the BKK Class I Facility.
28 This manifested waste contained Hazardous Substances (including Hazardous

1 Substances other than asbestos) that Defendant Armstrong World Industries, Inc.
2 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
3 Defendant Armstrong World Industries, Inc. has not incurred any response costs at
4 the BKK Class I Facility nor has it paid its fair share of response costs incurred by
5 the Plaintiffs at the BKK Class I Facility.

6 101. According to historical BKK Corp. records, Defendant Arnold
7 Circuits, Inc. contributed manifested waste to the BKK Class I Facility. This
8 manifested waste contained Hazardous Substances that Defendant Arnold Circuits,
9 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
10 Defendant Arnold Circuits, Inc. has not incurred any response costs at the BKK
11 Class I Facility nor has it paid its fair share of response costs incurred by the
12 Plaintiffs at the BKK Class I Facility.

13 102. Upon information and belief, Defendant Arnold Circuits, Inc. is the
14 successor to Arnold Electronics Inc. and/or otherwise liable for manifested waste
15 that was contributed to the BKK Class I Facility by Arnold Electronics Inc.
16 According to historical BKK Corp. records, Arnold Electronics Inc. contributed
17 manifested waste to the BKK Class I Facility. This manifested waste contained
18 Hazardous Substances that Arnold Electronics Inc. generated and/or arranged for its
19 disposal at the BKK Class I Facility. To date, Defendant Arnold Circuits, Inc. has
20 not incurred any response costs at the BKK Class I Facility nor has it paid its fair
21 share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

22 103. According to historical BKK Corp. records, Defendant Arnold
23 Electronics Inc. contributed manifested waste to the BKK Class I Facility. This
24 manifested waste contained Hazardous Substances that Defendant Arnold
25 Electronics Inc. generated and/or arranged for its disposal at the BKK Class I
26 Facility. To date, Defendant Arnold Electronics Inc. has not incurred any response
27 costs at the BKK Class I Facility nor has it paid its fair share of response costs
28 incurred by the Plaintiffs at the BKK Class I Facility.

1 104. According to historical BKK Corp. records, Defendant Arnold
2 Engineering Co. contributed manifested waste to the BKK Class I Facility. This
3 manifested waste contained Hazardous Substances that Defendant Arnold
4 Engineering Co. generated and/or arranged for its disposal at the BKK Class I
5 Facility. To date, Defendant Arnold Engineering Co. has not incurred any response
6 costs at the BKK Class I Facility nor has it paid its fair share of response costs
7 incurred by the Plaintiffs at the BKK Class I Facility.

8 105. Upon information and belief, Defendant Arnold Engineering Co. is the
9 successor to Arnold Electronics Inc. and/or otherwise liable for manifested waste
10 that was contributed to the BKK Class I Facility by Arnold Electronics Inc.
11 According to historical BKK Corp. records, Arnold Electronics Inc. contributed
12 manifested waste to the BKK Class I Facility. This manifested waste contained
13 Hazardous Substances that Arnold Electronics Inc. generated and/or arranged for its
14 disposal at the BKK Class I Facility. To date, Defendant Arnold Engineering Co.
15 has not incurred any response costs at the BKK Class I Facility nor has it paid its
16 fair share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

17 106. According to historical BKK Corp. records, Defendant Atlas
18 Fabricators contributed manifested waste to the BKK Class I Facility. This
19 manifested waste contained Hazardous Substances that Defendant Atlas Fabricators
20 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
21 Defendant Atlas Fabricators has not incurred any response costs at the BKK Class I
22 Facility nor has it paid its fair share of response costs incurred by the Plaintiffs at
23 the BKK Class I Facility.

24 107. Upon information and belief, Defendant Atomica Corp. is the
25 successor to Applied Magnetics Corp. and/or otherwise liable for manifested waste
26 that was contributed to the BKK Class I Facility by Applied Magnetics Corp.
27 According to historical BKK Corp. records, Applied Magnetics Corp. contributed
28 manifested waste to the BKK Class I Facility. This manifested waste contained

1 Hazardous Substances that Applied Magnetics Corp. generated and/or arranged for
2 its disposal at the BKK Class I Facility. To date, Defendant Atomica Corp. has not
3 incurred any response costs at the BKK Class I Facility nor has it paid its fair share
4 of response costs incurred by the Plaintiffs at the BKK Class I Facility.

5 108. According to historical BKK Corp. records, Defendant Aurum
6 Industries, Inc. contributed manifested waste to the BKK Class I Facility. This
7 manifested waste contained Hazardous Substances that Defendant Aurum
8 Industries, Inc. generated and/or arranged for its disposal at the BKK Class I
9 Facility. To date, Defendant Aurum Industries, Inc. has not incurred any response
10 costs at the BKK Class I Facility nor has it paid its fair share of response costs
11 incurred by the Plaintiffs at the BKK Class I Facility.

12 109. Upon information and belief, Defendant Axel Johnson, Inc. is the
13 successor to Industrial Tectonics Bearings and/or otherwise liable for manifested
14 waste that was contributed to the BKK Class I Facility by Industrial Tectonics
15 Bearings. According to historical BKK Corp. records, Industrial Tectonics
16 Bearings contributed manifested waste to the BKK Class I Facility. This manifested
17 waste contained Hazardous Substances that Industrial Tectonics Bearings generated
18 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
19 Axel Johnson, Inc. has not incurred any response costs at the BKK Class I Facility
20 nor has it paid its fair share of response costs incurred by the Plaintiffs at the BKK
21 Class I Facility.

22 110. Upon information and belief, Defendant B. Jadow and Sons, Inc. is the
23 successor to Krazy Glue Inc. and/or otherwise liable for manifested waste that was
24 contributed to the BKK Class I Facility by Krazy Glue Inc. According to historical
25 BKK Corp. records, Krazy Glue Inc. contributed manifested waste to the BKK
26 Class I Facility. This manifested waste contained Hazardous Substances that Krazy
27 Glue Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To
28 date, Defendant B. Jadow and Sons, Inc. has not incurred any response costs at the

1 BKK Class I Facility nor has it paid its fair share of response costs incurred by the
2 Plaintiffs at the BKK Class I Facility.

3 111. According to historical BKK Corp. records, Defendant B.P. John
4 Furniture Co. contributed manifested waste to the BKK Class I Facility. This
5 manifested waste contained Hazardous Substances that Defendant B.P. John
6 Furniture Co. generated and/or arranged for its disposal at the BKK Class I Facility.
7 To date, Defendant B.P. John Furniture Co. has not incurred any response costs at
8 the BKK Class I Facility nor has it paid its fair share of response costs incurred by
9 the Plaintiffs at the BKK Class I Facility.

10 112. Upon information and belief, Defendant BAE Systems San Diego Ship
11 Repair Inc. is the successor to Southwest Marine, Inc. and/or otherwise liable for
12 manifested waste that was contributed to the BKK Class I Facility by Southwest
13 Marine, Inc. According to historical BKK Corp. records, Southwest Marine, Inc.
14 contributed manifested waste to the BKK Class I Facility. This manifested waste
15 contained Hazardous Substances that Southwest Marine, Inc. generated and/or
16 arranged for its disposal at the BKK Class I Facility. To date, Defendant BAE
17 Systems San Diego Ship Repair Inc. has not incurred any response costs at the
18 BKK Class I Facility nor has it paid its fair share of response costs incurred by the
19 Plaintiffs at the BKK Class I Facility.

20 113. According to historical BKK Corp. records, Defendant Balser
21 Trucking contributed manifested waste to the BKK Class I Facility. This
22 manifested waste contained Hazardous Substances that Defendant Balser Trucking
23 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
24 Defendant Balser Trucking has not incurred any costs at the BKK Class I Facility
25 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
26 Facility.

27 114. According to historical BKK Corp. records, Defendant Barry Wright
28 Controls contributed manifested waste to the BKK Class I Facility. This

1 manifested waste contained Hazardous Substances that Defendant Barry Wright
2 Controls generated and/or arranged for its disposal at the BKK Class I Facility. To
3 date, Defendant Barry Wright Controls has not incurred any response costs at the
4 BKK Class I Facility nor has it paid its fair share of response costs incurred by the
5 Plaintiffs at the BKK Class I Facility.

6 115. Upon information and belief, Defendant Bausch Health Americas, Inc.
7 is the successor to ICN Pharmaceuticals and/or otherwise liable for manifested
8 waste that was contributed to the BKK Class I Facility by ICN Pharmaceuticals.
9 According to historical BKK Corp. records, ICN Pharmaceuticals contributed
10 manifested waste to the BKK Class I Facility. This manifested waste contained
11 Hazardous Substances that ICN Pharmaceuticals generated and/or arranged for its
12 disposal at the BKK Class I Facility. To date, Defendant Bausch Health Americas,
13 Inc. has not incurred any response costs at the BKK Class I Facility nor has it paid
14 its fair share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

15 116. Upon information and belief, Defendant Baxter International Inc. is the
16 successor to American Scientific Products and/or otherwise liable for manifested
17 waste that was contributed to the BKK Class I Facility by American Scientific
18 Products. According to historical BKK Corp. records, American Scientific
19 Products contributed manifested waste to the BKK Class I Facility. This manifested
20 waste contained Hazardous Substances that American Scientific Products generated
21 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
22 Baxter International Inc. has not incurred any response costs at the BKK Class I
23 Facility nor has it paid its fair share of response costs incurred by the Plaintiffs at
24 the BKK Class I Facility.

25 117. According to historical BKK Corp. records, Defendant Beatrice Hunt
26 Wesson Inc. contributed manifested waste to the BKK Class I Facility. This
27 manifested waste contained Hazardous Substances that Defendant Beatrice Hunt
28 Wesson Inc. generated and/or arranged for its disposal at the BKK Class I Facility.

1 To date, Defendant Beatrice Hunt Wesson Inc. has not incurred any response costs
2 at the BKK Class I Facility nor has it paid its fair share of response costs incurred
3 by the Plaintiffs at the BKK Class I Facility.

4 118. According to historical BKK Corp. records, Defendant Beazer East,
5 Inc. and/or its predecessor Koppers Co. Inc. contributed manifested waste to the
6 BKK Class I Facility. This manifested waste contained Hazardous Substances that
7 Defendant Beazer East and/or its predecessor Koppers Co. Inc. generated and/or
8 arranged for its disposal at the BKK Class I Facility. To date, Defendant Beazer
9 East, Inc. has not incurred any response costs at the BKK Class I Facility nor has it
10 paid its fair share of response costs incurred by the Plaintiffs at the BKK Class I
11 Facility.

12 119. According to historical BKK Corp. records, Defendant Beckman
13 Coulter Inc. contributed manifested waste to the BKK Class I Facility. This
14 manifested waste contained Hazardous Substances that Defendant Beckman
15 Coulter Inc. generated and/or arranged for its disposal at the BKK Class I Facility.
16 To date, Defendant Beckman Coulter Inc. has not incurred any response costs at the
17 BKK Class I Facility nor has it paid its fair share of response costs incurred by the
18 Plaintiffs at the BKK Class I Facility.

19 120. According to historical BKK Corp. records, Defendant Becton,
20 Dickinson and Company contributed manifested waste to the BKK Class I Facility.
21 This manifested waste contained Hazardous Substances that Defendant Becton,
22 Dickinson and Company generated and/or arranged for its disposal at the BKK
23 Class I Facility. To date, Defendant Becton, Dickinson and Company has not
24 incurred any response costs at the BKK Class I Facility nor has it paid its fair share
25 of response costs incurred by the Plaintiffs at the BKK Class I Facility.

26 121. According to historical BKK Corp. records, Defendant Bernard Epps
27 & Co. contributed manifested waste to the BKK Class I Facility. This manifested
28 waste contained Hazardous Substances that Defendant Bernard Epps & Co.

1 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
2 Defendant Bernard Epps & Co. has not incurred any response costs at the BKK
3 Class I Facility nor has it paid its fair share of response costs incurred by the
4 Plaintiffs at the BKK Class I Facility.

5 122. According to historical BKK Corp. records, Defendant Bethlehem
6 Steel Corp. contributed manifested waste to the BKK Class I Facility. This
7 manifested waste contained Hazardous Substances that Defendant Bethlehem Steel
8 Corp. generated and/or arranged for its disposal at the BKK Class I Facility. To
9 date, Defendant Bethlehem Steel Corp. has not incurred any response costs at the
10 BKK Class I Facility nor has it paid its fair share of response costs incurred by the
11 Plaintiffs at the BKK Class I Facility.

12 123. According to historical BKK Corp. records, Defendant Beverly Hills
13 Oil Company contributed manifested waste to the BKK Class I Facility. This
14 manifested waste contained Hazardous Substances that Defendant Beverly Hills Oil
15 Company generated and/or arranged for its disposal at the BKK Class I Facility.
16 To date, Defendant Beverly Hills Oil Company has not incurred any response costs
17 at the BKK Class I Facility nor has it paid its fair share of response costs incurred
18 by the Plaintiffs at the BKK Class I Facility.

19 124. According to historical BKK Corp. records, Defendant BFI XV Realty
20 Fund Ltd. contributed manifested waste to the BKK Class I Facility. This
21 manifested waste contained Hazardous Substances that Defendant BFI XV Realty
22 Fund Ltd. generated and/or arranged for its disposal at the BKK Class I Facility.
23 To date, Defendant BFI XV Realty Fund Ltd. has not incurred any response costs at
24 the BKK Class I Facility nor has it paid its fair share of response costs incurred by
25 the Plaintiffs at the BKK Class I Facility.

26 125. According to historical BKK Corp. records, Defendant Big Three
27 Industries Inc. contributed manifested waste to the BKK Class I Facility. This
28 manifested waste contained Hazardous Substances that Defendant Big Three

1 Industries Inc. generated and/or arranged for its disposal at the BKK Class I
2 Facility. To date, Defendant Big Three Industries Inc. has not incurred any
3 response costs at the BKK Class I Facility nor has it paid its fair share of response
4 costs incurred by the Plaintiffs at the BKK Class I Facility.

5 126. According to historical BKK Corp. records, Defendant Birtcher Pacific
6 contributed manifested waste to the BKK Class I Facility. This manifested waste
7 contained Hazardous Substances that Defendant Birtcher Pacific generated and/or
8 arranged for its disposal at the BKK Class I Facility. To date, Defendant Birtcher
9 Pacific has not incurred any response costs at the BKK Class I Facility nor has it
10 paid its fair share of response costs incurred by the Plaintiffs at the BKK Class I
11 Facility.

12 127. Upon information and belief, Defendant Blue Triton Brands, Inc. is the
13 successor to Arrowhead Mountain Spring Water Company and/or otherwise liable
14 for manifested waste that was contributed to the BKK Class I Facility by
15 Arrowhead Mountain Spring Water Company. According to historical BKK Corp.
16 records, Arrowhead Mountain Spring Water Company contributed manifested
17 waste to the BKK Class I Facility. This manifested waste contained Hazardous
18 Substances that Arrowhead Mountain Spring Water Company generated and/or
19 arranged for its disposal at the BKK Class I Facility. To date, Defendant Blue
20 Triton Brands, Inc. has not incurred any response costs at the BKK Class I Facility
21 nor has it paid its fair share of response costs incurred by the Plaintiffs at the BKK
22 Class I Facility.

23 128. Upon information and belief, Defendant Bostik, Inc. is the successor to
24 R. & D. Latex Co. and/or otherwise liable for manifested waste that was
25 contributed to the BKK Class I Facility by R. & D. Latex Co. According to
26 historical BKK Corp. records, R. & D. Latex Co. contributed manifested waste to
27 the BKK Class I Facility. This manifested waste contained Hazardous Substances
28 that R. & D. Latex Co. generated and/or arranged for its disposal at the BKK Class

1 I Facility. To date, Defendant Bostik, Inc. has not incurred any response costs at the
2 BKK Class I Facility nor has it paid its fair share of response costs incurred by the
3 Plaintiffs at the BKK Class I Facility.

4 129. Upon information and belief, Defendant BPJ International, Inc. is the
5 successor to B.P. John Furniture Co. and/or otherwise liable for manifested waste
6 that was contributed to the BKK Class I Facility by B.P. John Furniture Co.
7 According to historical BKK Corp. records, B.P. John Furniture Co. contributed
8 manifested waste to the BKK Class I Facility. This manifested waste contained
9 Hazardous Substances that B.P. John Furniture Co. generated and/or arranged for
10 its disposal at the BKK Class I Facility. To date, Defendant BPJ International, Inc.
11 has not incurred any response costs at the BKK Class I Facility nor has it paid its
12 fair share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

13 130. Upon information and belief, Defendant Bridgestone Americas, Inc. is
14 the successor to Firestone Tire & Rubber Co. and/or otherwise liable for manifested
15 waste that was contributed to the BKK Class I Facility by Firestone Tire & Rubber
16 Co. According to historical BKK Corp. records, Firestone Tire & Rubber Co.
17 contributed manifested waste to the BKK Class I Facility. This manifested waste
18 contained Hazardous Substances that Firestone Tire & Rubber Co. generated and/or
19 arranged for its disposal at the BKK Class I Facility. To date, Defendant
20 Bridgestone Americas, Inc. has not incurred any response costs at the BKK Class I
21 Facility nor has it paid its fair share of response costs incurred by the Plaintiffs at
22 the BKK Class I Facility.

23 131. According to historical BKK Corp. records, Defendant Brooks &
24 Perkins Brownline Division contributed manifested waste to the BKK Class I
25 Facility. This manifested waste contained Hazardous Substances that Defendant
26 Brooks & Perkins Brownline Division generated and/or arranged for its disposal at
27 the BKK Class I Facility. To date, Defendant Brooks & Perkins Brownline
28 Division has not incurred any response costs at the BKK Class I Facility nor has it

1 paid its fair share of response costs incurred by the Plaintiffs at the BKK Class I
2 Facility.

3 132. According to historical BKK Corp. records, Defendant Byron Jackson
4 Pumps contributed manifested waste to the BKK Class I Facility. This manifested
5 waste contained Hazardous Substances that Defendant Byron Jackson Pumps
6 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
7 Defendant Byron Jackson Pumps has not incurred any response costs at the BKK
8 Class I Facility nor has it paid its fair share of response costs incurred by the
9 Plaintiffs at the BKK Class I Facility.

10 133. Upon information and belief, Defendant C&D Technologies, Inc. is
11 the successor to Circuit One Div. of LH Research Inc. and/or Trojan Battery Co.
12 and/or otherwise liable for manifested waste that was contributed to the BKK Class
13 I Facility by Circuit One Div. of LH Research Inc. and/or Trojan Battery Co.
14 According to historical BKK Corp. records, Circuit One Div. of LH Research Inc.
15 and Trojan Battery Co. contributed manifested waste to the BKK Class I Facility.
16 This manifested waste contained Hazardous Substances that Circuit One Div. of LH
17 Research Inc. and Trojan Battery Co. generated and/or arranged for its disposal at
18 the BKK Class I Facility. To date, Defendant C&D Technologies, Inc. has not
19 incurred any response costs at the BKK Class I Facility nor has it paid its fair share
20 of response costs incurred by the Plaintiffs at the BKK Class I Facility.

21 134. According to historical BKK Corp. records, Defendant Cal Chem
22 Cleaning Co. contributed manifested waste to the BKK Class I Facility. This
23 manifested waste contained Hazardous Substances that Defendant Cal Chem
24 Cleaning Co. generated and/or arranged for its disposal at the BKK Class I Facility.
25 To date, Defendant Cal Chem Cleaning Co. has not incurred any response costs at
26 the BKK Class I Facility nor has it paid Its fair share of response costs incurred by
27 the Plaintiffs at the BKK Class I Facility.

28 135. According to historical BKK Corp. records, Defendant Cal Nev

1 Pipeline Co. contributed manifested waste to the BKK Class I Facility. This
2 manifested waste contained Hazardous Substances that Defendant Cal Nev Pipeline
3 Co. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
4 Defendant Cal Nev Pipeline Co. has not incurred any response costs at the BKK
5 Class I Facility nor has it paid its fair share of response costs incurred by the
6 Plaintiffs at the BKK Class I Facility.

7 136. According to historical BKK Corp. records, Defendant Cal Style
8 Furniture Manufacturing Co. contributed manifested waste to the BKK Class I
9 Facility. This manifested waste contained Hazardous Substances that Defendant Cal
10 Style Furniture Manufacturing Co. generated and/or arranged for its disposal at the
11 BKK Class I Facility. To date, Defendant Cal Style Furniture Manufacturing Co.
12 has not incurred any response costs at the BKK Class I Facility nor has it paid its
13 fair share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

14 137. According to historical BKK Corp. records, Defendant Cali-Blok
15 contributed manifested waste to the BKK Class I Facility. This manifested waste
16 contained Hazardous Substances that Defendant Cali-Blok generated and/or
17 arranged for its disposal at the BKK Class I Facility. To date, Defendant Cali-Blok
18 has not incurred any response costs at the BKK Class I Facility nor has it paid its
19 fair share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

20 138. According to historical BKK Corp. records, Defendant Calbiochem-
21 Behring Corp. contributed manifested waste to the BKK Class I Facility. This
22 manifested waste contained Hazardous Substances that Defendant Calbiochem-
23 Behring Corp. generated and/or arranged for its disposal at the BKK Class I
24 Facility. To date, Defendant Calbiochem-Behring Corp. has not incurred any
25 response costs at the BKK Class I Facility nor has it paid its fair share of response
26 costs incurred by the Plaintiffs at the BKK Class I Facility.

27 139. According to historical BKK Corp. records, Defendant California
28 Carpet Co. contributed manifested waste to the BKK Class I Facility. This

1 manifested waste contained Hazardous Substances that Defendant California Carpet
2 Co. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
3 Defendant California Carpet Co. has not incurred any response costs at the BKK
4 Class I Facility nor has it paid its fair share of response costs incurred by the
5 Plaintiffs at the BKK Class I Facility.

6 140. According to historical BKK Corp. records, Defendant Calprotech Inc.
7 contributed manifested waste to the BKK Class I Facility. This manifested waste
8 contained Hazardous Substances that Defendant Calprotech Inc. generated and/or
9 arranged for its disposal at the BKK Class I Facility. To date, Defendant Calprotech
10 Inc. has not incurred any response costs at the BKK Class I Facility nor has it paid
11 its fair share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

12 141. Upon information and belief, Defendant Capital Parade USA, Inc. is
13 the successor to Circuit One Div. of LH Research Inc. and/or otherwise liable for
14 manifested waste that was contributed to the BKK Class I Facility by Circuit One
15 Div. of LH Research Inc. According to historical BKK Corp. records, Circuit One
16 Div. of LH Research Inc. contributed manifested waste to the BKK Class I Facility.
17 This manifested waste contained Hazardous Substances that Circuit One Div. of LH
18 Research Inc. generated and/or arranged for its disposal at the BKK Class I Facility.
19 To date, Defendant Capital Parade USA, Inc. has not incurred any response costs at
20 the BKK Class I Facility nor has it paid its fair share of response costs incurred by
21 the Plaintiffs at the BKK Class I Facility.

22 142. According to historical BKK Corp. records, Defendant Cargill Inc.
23 contributed manifested waste to the BKK Class I Facility. This manifested waste
24 contained Hazardous Substances that Defendant Cargill Inc. generated and/or
25 arranged for its disposal at the BKK Class I Facility. To date, Defendant Cargill
26 Inc. has not incurred any response costs at the BKK Class I Facility nor has it paid
27 its fair share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

28 143. According to historical BKK Corp. records, Defendant Carrier

1 Corporation contributed manifested waste to the BKK Class I Facility. This
2 manifested waste contained Hazardous Substances that Defendant Carrier
3 Corporation generated and/or arranged for its disposal at the BKK Class I Facility.
4 To date, Defendant Carrier Corporation has not incurred any response costs at the
5 BKK Class I Facility nor has it paid its fair share of response costs incurred by the
6 Plaintiffs at the BKK Class I Facility.

7 144. Upon information and belief, Defendant Carrier Corporation is the
8 successor to Henry Soss & Co. Inc. and/or otherwise liable for manifested waste
9 that was contributed to the BKK Class I Facility by Henry Soss & Co. Inc.
10 According to historical BKK Corp. records, Henry Soss & Co. Inc. contributed
11 manifested waste to the BKK Class I Facility. This manifested waste contained
12 Hazardous Substances that Henry Soss & Co. Inc. generated and/or arranged for its
13 disposal at the BKK Class I Facility. To date, Defendant Carrier Corporation has
14 not incurred any response costs at the BKK Class I Facility nor has it paid its fair
15 share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

16 145. Upon information and belief, Defendant Cerro Corporation is the
17 successor to JCX and/or otherwise liable for manifested waste that was contributed
18 to the BKK Class I Facility by JCX. According to historical BKK Corp. records,
19 JCX contributed manifested waste to the BKK Class I Facility. This manifested
20 waste contained Hazardous Substances that JCX generated and/or arranged for its
21 disposal at the BKK Class I Facility. To date, Defendant Cerro Corporation has not
22 incurred any response costs at the BKK Class I Facility nor has it paid its fair share
23 of response costs incurred by the Plaintiffs at the BKK Class I Facility.

24 146. According to historical BKK Corp. records, Defendant CHB Foods
25 (identified in the related case as “CHP Foods”) contributed manifested waste to the
26 BKK Class I Facility. This manifested waste contained Hazardous Substances that
27 Defendant CHB Foods (identified in the related case as “CHP Foods”) generated
28 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant

1 CHB Foods (identified in the related case as “CHP Foods”) has not incurred any
2 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
3 the Plaintiffs at the BKK Class I Facility.

4 147. According to historical BKK Corp. records, Defendant Cia Minera De
5 Cananea SA contributed manifested waste to the BKK Class I Facility. This
6 manifested waste contained Hazardous Substances that Defendant Cia Minera De
7 Cananea SA generated and/or arranged for its disposal at the BKK Class I Facility.
8 To date, Defendant Cia Minera De Cananea SA has not incurred any response costs
9 at the BKK Class I Facility nor has it paid its fair share of response costs incurred
10 by the Plaintiffs at the BKK Class I Facility.

11 148. According to historical BKK Corp. records, Defendant Circuit One
12 Div. of LH Research Inc. contributed manifested waste to the BKK Class I Facility.
13 This manifested waste contained Hazardous Substances that Defendant Circuit One
14 Div. of LH Research Inc. generated and/or arranged for its disposal at the BKK
15 Class I Facility. To date, Defendant Circuit One Div. of LH Research Inc. has not
16 incurred any response costs at the BKK Class I Facility nor has it paid its fair share
17 of response costs incurred by the Plaintiffs at the BKK Class I Facility.

18 149. According to historical BKK Corp. records, Defendant Cleveland
19 Wrecking Co. contributed manifested waste to the BKK Class I Facility. This
20 manifested waste contained Hazardous Substances that Defendant Cleveland
21 Wrecking Co. generated and/or arranged for its disposal at the BKK Class I
22 Facility. To date, Defendant Cleveland Wrecking Co. has not incurred any costs at
23 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
24 Plaintiffs at the BKK Class I Facility.

25 150. According to historical BKK Corp. records, Defendant Coast Plating,
26 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
27 waste contained Hazardous Substances that Defendant Coast Plating, Inc. generated
28 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant

1 Coast Plating, Inc. has not incurred any costs at the BKK Class I Facility nor has it
2 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 151. According to historical BKK Corp. records, Defendant Cognis Corp.
4 contributed manifested waste to the BKK Class I Facility. This manifested waste
5 contained Hazardous Substances that Defendant Cognis Corp. generated and/or
6 arranged for its disposal at the BKK Class I Facility. To date, Defendant Cognis
7 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
8 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

9 152. Upon information and belief, Defendant Conagra Brands, Inc. is the
10 successor to Beatrice Hunt Wesson Inc. and/or otherwise liable for manifested
11 waste that was contributed to the BKK Class I Facility by Beatrice Hunt Wesson
12 Inc. According to historical BKK Corp. records, Beatrice Hunt Wesson Inc.
13 contributed manifested waste to the BKK Class I Facility. This manifested waste
14 contained Hazardous Substances that Beatrice Hunt Wesson Inc. generated and/or
15 arranged for its disposal at the BKK Class I Facility. To date, Defendant Conagra
16 Brands, Inc. has not incurred any costs at the BKK Class I Facility nor has it paid
17 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

18 153. According to historical BKK Corp. records, Defendant Control
19 Components Inc. contributed manifested waste to the BKK Class I Facility. This
20 manifested waste contained Hazardous Substances that Defendant Control
21 Components Inc. generated and/or arranged for its disposal at the BKK Class I
22 Facility. To date, Defendant Control Components Inc. has not incurred any costs at
23 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
24 Plaintiffs at the BKK Class I Facility.

25 154. According to historical BKK Corp. records, Defendant Cragar
26 Industries contributed manifested waste to the BKK Class I Facility. This
27 manifested waste contained Hazardous Substances that Defendant Cragar Industries
28 generated and/or arranged for its disposal at the BKK Class I Facility. To date,

1 Defendant Cragar Industries has not incurred any costs at the BKK Class I Facility
2 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
3 Facility.

4 155. According to historical BKK Corp. records, Defendant Crain Western,
5 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
6 waste contained Hazardous Substances that Defendant Crain Western, Inc.
7 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
8 Defendant Crain Western, Inc. has not incurred any costs at the BKK Class I
9 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
10 Class I Facility.

11 156. Upon information and belief, Defendant CRE Liquidation LLC is the
12 successor to Cal Style Furniture Manufacturing Co. and/or otherwise liable for
13 manifested waste that was contributed to the BKK Class I Facility by Cal Style
14 Furniture Manufacturing Co. According to historical BKK Corp. records, Cal Style
15 Furniture Manufacturing Co. contributed manifested waste to the BKK Class I
16 Facility. This manifested waste contained Hazardous Substances that Cal Style
17 Furniture Manufacturing Co. generated and/or arranged for its disposal at the BKK
18 Class I Facility. To date, Defendant CRE Liquidation LLC has not incurred any
19 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
20 the Plaintiffs at the BKK Class I Facility.

21 157. According to historical BKK Corp. records, Defendant Crockett
22 Container Corp. contributed manifested waste to the BKK Class I Facility. This
23 manifested waste contained Hazardous Substances that Defendant Crockett
24 Container Corp. generated and/or arranged for its disposal at the BKK Class I
25 Facility. To date, Defendant Crockett Container Corp. has not incurred any costs at
26 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
27 Plaintiffs at the BKK Class I Facility.

28 158. According to historical BKK Corp. records, Defendant Crowley Inc.

1 contributed manifested waste to the BKK Class I Facility. This manifested waste
2 contained Hazardous Substances that Defendant Crowley Inc. generated and/or
3 arranged for its disposal at the BKK Class I Facility. To date, Defendant Crowley
4 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
5 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

6 159. According to historical BKK Corp. records, Defendant Crown
7 Beverage Packaging contributed manifested waste to the BKK Class I Facility.
8 This manifested waste contained Hazardous Substances that Defendant Crown
9 Beverage Packaging generated and/or arranged for its disposal at the BKK Class I
10 Facility. To date, Defendant Crown Beverage Packaging has not incurred any costs
11 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
12 Plaintiffs at the BKK Class I Facility.

13 160. Upon information and belief, Defendant Crown Central LLC is the
14 successor to Crown Central Petroleum Corporation and/or otherwise liable for
15 manifested waste that was contributed to the BKK Class I Facility by Crown
16 Central Petroleum Corporation. According to historical BKK Corp. records, Crown
17 Central Petroleum Corporation contributed manifested waste to the BKK Class I
18 Facility. This manifested waste contained Hazardous Substances that Crown
19 Central Petroleum Corporation generated and/or arranged for its disposal at the
20 BKK Class I Facility. To date, Defendant Crown Central LLC has not incurred any
21 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
22 the Plaintiffs at the BKK Class I Facility.

23 161. According to historical BKK Corp. records, Defendant Crown Central
24 Petroleum Corporation contributed manifested waste to the BKK Class I Facility.
25 This manifested waste contained Hazardous Substances that Defendant Crown
26 Central Petroleum Corporation generated and/or arranged for its disposal at the
27 BKK Class I Facility. To date, Defendant Crown Central Petroleum Corporation
28 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share

1 of costs incurred by the Plaintiffs at the BKK Class I Facility.

2 162. According to historical BKK Corp. records, Defendant Crown
3 Disposal Inc. contributed manifested waste to the BKK Class I Facility. This
4 manifested waste contained Hazardous Substances that Defendant Crown Disposal
5 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
6 Defendant Crown Disposal Inc. has not incurred any costs at the BKK Class I
7 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
8 Class I Facility.

9 163. Upon information and belief, Defendant Crown Disposal Inc. is the
10 successor to Liquid Waste Management and/or otherwise liable for manifested
11 waste that was contributed to the BKK Class I Facility by Liquid Waste
12 Management. According to historical BKK Corp. records, Liquid Waste
13 Management contributed manifested waste to the BKK Class I Facility. This
14 manifested waste contained Hazardous Substances that Liquid Waste Management
15 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
16 Defendant Crown Disposal Inc. has not incurred any costs at the BKK Class I
17 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
18 Class I Facility.

19 164. According to historical BKK Corp. records, Defendant Crown
20 Zellerbach Co. contributed manifested waste to the BKK Class I Facility. This
21 manifested waste contained Hazardous Substances that Defendant Crown
22 Zellerbach Co. generated and/or arranged for its disposal at the BKK Class I
23 Facility. To date, Defendant Crown Zellerbach Co. has not incurred any costs at the
24 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
25 at the BKK Class I Facility.

26 165. Upon information and belief, Defendant CSX Transportation is the
27 successor to Sea Land Service Inc. and/or otherwise liable for manifested waste that
28 was contributed to the BKK Class I Facility by Sea Land Service Inc. According to

1 historical BKK Corp. records, Sea Land Service Inc. contributed manifested waste
2 to the BKK Class I Facility. This manifested waste contained Hazardous
3 Substances that Sea Land Service Inc. generated and/or arranged for its disposal at
4 the BKK Class I Facility. To date, Defendant CSX Transportation has not incurred
5 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
6 by the Plaintiffs at the BKK Class I Facility.

7 166. According to historical BKK Corp. records, Defendant Cummins
8 Service & Sales Inc. contributed manifested waste to the BKK Class I Facility.
9 This manifested waste contained Hazardous Substances that Defendant Cummins
10 Service & Sales Inc. generated and/or arranged for its disposal at the BKK Class I
11 Facility. To date, Defendant Cummins Service & Sales Inc. has not incurred any
12 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
13 the Plaintiffs at the BKK Class I Facility.

14 167. According to historical BKK Corp. records, Defendant Cyclo
15 Chemical Co. contributed manifested waste to the BKK Class I Facility. This
16 manifested waste contained Hazardous Substances that Defendant Cyclo Chemical
17 Co. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
18 Defendant Cyclo Chemical Co. has not incurred any costs at the BKK Class I
19 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
20 Class I Facility.

21 168. Upon information and belief, Defendant Cytec Industries Inc. is the
22 successor to Fiberite West Coast Corp. and/or otherwise liable for manifested waste
23 that was contributed to the BKK Class I Facility by Fiberite West Coast Corp.
24 According to historical BKK Corp. records, Fiberite West Coast Corp. contributed
25 manifested waste to the BKK Class I Facility. This manifested waste contained
26 Hazardous Substances that Fiberite West Coast Corp. generated and/or arranged for
27 its disposal at the BKK Class I Facility. To date, Defendant Cytec Industries Inc.
28 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share

1 of costs incurred by the Plaintiffs at the BKK Class I Facility.

2 169. According to historical BKK Corp. records, Defendant Daiwa Corp.
3 contributed manifested waste to the BKK Class I Facility. This manifested waste
4 contained Hazardous Substances that Defendant Daiwa Corp. generated and/or
5 arranged for its disposal at the BKK Class I Facility. To date, Defendant Daiwa
6 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
7 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

8 170. According to historical BKK Corp. records, Defendant Darnell
9 Corporate Ltd. Contributed manifested waste to the BKK Class I Facility. This
10 manifested waste contained Hazardous Substances that Defendant Darnell
11 Corporate Ltd. Generated and/or arranged for its disposal at the BKK Class I
12 Facility. To date, Defendant Darnell Corporate Ltd. Has not incurred any costs at
13 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
14 Plaintiffs at the BKK Class I Facility.

15 171. According to historical BKK Corp. records, Defendant Data Products
16 Corp. contributed manifested waste to the BKK Class I Facility. This manifested
17 waste contained Hazardous Substances that Defendant Data Products Corp.
18 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
19 Defendant Data Products Corp. has not incurred any response costs at the BKK
20 Class I Facility nor has it paid its fair share of response costs incurred by the
21 Plaintiffs at the BKK Class I Facility.

22 172. According to historical BKK Corp. records, Defendant Davis
23 Investment Co. contributed manifested waste to the BKK Class I Facility. This
24 manifested waste contained Hazardous Substances that Defendant Davis
25 Investment Co. generated and/or arranged for its disposal at the BKK Class I
26 Facility. To date, Defendant Davis Investment Co. has not incurred any costs at the
27 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
28 at the BKK Class I Facility.

1 173. According to historical BKK Corp. records, Defendant Decratrend
2 Corp. contributed manifested waste to the BKK Class I Facility. This manifested
3 waste contained Hazardous Substances that Defendant Decratrend Corp. generated
4 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
5 Decratrend Corp. has not incurred any costs at the BKK Class I Facility nor has it
6 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

7 174. Upon information and belief, Defendant Densco Products and Services
8 Americas, Inc. is the successor to Nippondenso of Los Angeles and/or otherwise
9 liable for manifested waste that was contributed to the BKK Class I Facility by
10 Nippondenso of Los Angeles. According to historical BKK Corp. records,
11 Nippondenso of Los Angeles contributed manifested waste to the BKK Class I
12 Facility. This manifested waste contained Hazardous Substances that Nippondenso
13 of Los Angeles generated and/or arranged for its disposal at the BKK Class I
14 Facility. To date, Defendant Densco Products and Services Americas, Inc. has not
15 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
16 incurred by the Plaintiffs at the BKK Class I Facility.

17 175. According to historical BKK Corp. records, Defendant Desoto Inc.
18 contributed manifested waste to the BKK Class I Facility. This manifested waste
19 contained Hazardous Substances that Defendant Desoto Inc. generated and/or
20 arranged for its disposal at the BKK Class I Facility. To date, Defendant Desoto
21 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
22 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 176. Upon information and belief, Defendant Devon Energy Corp. is the
24 successor to Pauley Petroleum Co. and/or otherwise liable for manifested waste that
25 was contributed to the BKK Class I Facility by Pauley Petroleum Co. According to
26 historical BKK Corp. records, Pauley Petroleum Co. contributed manifested waste
27 to the BKK Class I Facility. This manifested waste contained Hazardous
28 Substances that Pauley Petroleum Co. generated and/or arranged for its disposal at

1 the BKK Class I Facility. To date, Defendant Devon Energy Corp. has not incurred
2 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
3 by the Plaintiffs at the BKK Class I Facility.

4 177. According to historical BKK Corp. records, Defendant Disposal
5 Control contributed manifested waste to the BKK Class I Facility. This manifested
6 waste contained Hazardous Substances that Defendant Disposal Control generated
7 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
8 Disposal Control has not incurred any costs at the BKK Class I Facility nor has it
9 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 178. According to historical BKK Corp. records, Defendant Don Kott Ford
11 (previously identified as Don Knott Ford) contributed manifested waste to the BKK
12 Class I Facility. This manifested waste contained Hazardous Substances that
13 Defendant Don Kott Ford (previously identified as Don Knott Ford) generated
14 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
15 Don Kott Ford (previously identified as Don Knott Ford) has not incurred any costs
16 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
17 Plaintiffs at the BKK Class I Facility.

18 179. According to historical BKK Corp. records, Defendant Douglas
19 Furniture of California contributed manifested waste to the BKK Class I Facility.
20 This manifested waste contained Hazardous Substances that Defendant Douglas
21 Furniture of California generated and/or arranged for its disposal at the BKK Class
22 I Facility. To date, Defendant Douglas Furniture of California has not incurred any
23 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
24 the Plaintiffs at the BKK Class I Facility.

25 180. Upon information and belief, Defendant Dowty Propellers Americas is
26 the successor to Hydraulic Units Inc. and/or otherwise liable for manifested waste
27 that was contributed to the BKK Class I Facility by Hydraulic Units Inc.
28 According to historical BKK Corp. records, Hydraulic Units Inc. contributed

1 manifested waste to the BKK Class I Facility. This manifested waste contained
2 Hazardous Substances that Hydraulic Units Inc. generated and/or arranged for its
3 disposal at the BKK Class I Facility. To date, Defendant Dowty Propellers
4 Americas has not incurred any costs at the BKK Class I Facility nor has it paid its
5 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

6 181. According to historical BKK Corp. records, Defendant Drackett Co.
7 contributed manifested waste to the BKK Class I Facility. This manifested waste
8 contained Hazardous Substances that Defendant Drackett Co. generated and/or
9 arranged for its disposal at the BKK Class I Facility. To date, Defendant Drackett
10 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
11 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

12 182. According to historical BKK Corp. records, Defendant Dresser
13 Industries, Inc. contributed manifested waste to the BKK Class I Facility. This
14 manifested waste contained Hazardous Substances that Defendant Dresser
15 Industries, Inc. generated and/or arranged for its disposal at the BKK Class I
16 Facility. To date, Defendant Dresser Industries, Inc. has not incurred any costs at
17 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
18 Plaintiffs at the BKK Class I Facility.

19 183. According to historical BKK Corp. records, Defendant Durex Inc.
20 contributed manifested waste to the BKK Class I Facility. This manifested waste
21 contained Hazardous Substances that Defendant Durex Inc. generated and/or
22 arranged for its disposal at the BKK Class I Facility. To date, Defendant Durex
23 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
24 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

25 184. Upon information and belief, Defendant E.T.C. Carpet Mills, Ltd. is
26 the successor to California Carpet Co. and/or otherwise liable for manifested waste
27 that was contributed to the BKK Class I Facility by California Carpet Co.
28 According to historical BKK Corp. records, California Carpet Co. contributed

1 manifested waste to the BKK Class I Facility. This manifested waste contained
2 Hazardous Substances that California Carpet Co. generated and/or arranged for its
3 disposal at the BKK Class I Facility. To date, Defendant E.T.C. Carpet Mills, Ltd.
4 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
5 of costs incurred by the Plaintiffs at the BKK Class I Facility.

6 185. Upon information and belief, Defendant East Coast Oceanview, LLC
7 is the successor to Wells Marine Inc. and/or otherwise liable for manifested waste
8 that was contributed to the BKK Class I Facility by Wells Marine Inc. According
9 to historical BKK Corp. records, Wells Marine Inc. contributed manifested waste to
10 the BKK Class I Facility. This manifested waste contained Hazardous Substances
11 that Wells Marine Inc. generated and/or arranged for its disposal at the BKK Class I
12 Facility. To date, Defendant East Coast Oceanview, LLC has not incurred any costs
13 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
14 Plaintiffs at the BKK Class I Facility.

15 186. According to historical BKK Corp. records, Defendant El Fab
16 contributed manifested waste to the BKK Class I Facility. This manifested waste
17 contained Hazardous Substances that Defendant El Fab generated and/or arranged
18 for its disposal at the BKK Class I Facility. To date, Defendant El Fab has not
19 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
20 incurred by the Plaintiffs at the BKK Class I Facility.

21 187. According to historical BKK Corp. records, Defendant Electrofilm Inc.
22 contributed manifested waste to the BKK Class I Facility. This manifested waste
23 contained Hazardous Substances that Defendant Electrofilm Inc. generated and/or
24 arranged for its disposal at the BKK Class I Facility. To date, Defendant
25 Electrofilm Inc. has not incurred any costs at the BKK Class I Facility nor has it
26 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 188. According to historical BKK Corp. records, Defendant Electronic
28 Materials Corp. contributed manifested waste to the BKK Class I Facility. This

1 manifested waste contained Hazardous Substances that Defendant Electronic
2 Materials Corp. generated and/or arranged for its disposal at the BKK Class I
3 Facility. To date, Defendant Electronic Materials Corp. has not incurred any costs
4 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
5 Plaintiffs at the BKK Class I Facility.

6 189. According to historical BKK Corp. records, Defendant Electrotech
7 Circuits Inc. contributed manifested waste to the BKK Class I Facility. This
8 manifested waste contained Hazardous Substances that Defendant Electrotech
9 Circuits Inc. generated and/or arranged for its disposal at the BKK Class I Facility.
10 To date, Defendant Electrotech Circuits Inc. has not incurred any costs at the BKK
11 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
12 BKK Class I Facility.

13 190. Upon information and belief, Defendant Elevate Textiles is the
14 successor to Wells Marine Inc. and/or otherwise liable for manifested waste that
15 was contributed to the BKK Class I Facility by Wells Marine Inc. According to
16 historical BKK Corp. records, Wells Marine Inc. contributed manifested waste to
17 the BKK Class I Facility. This manifested waste contained Hazardous Substances
18 that Wells Marine Inc. generated and/or arranged for its disposal at the BKK Class I
19 Facility. To date, Defendant Elevate Textiles has not incurred any costs at the BKK
20 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
21 BKK Class I Facility.

22 191. According to historical BKK Corp. records, Defendant EME Corp.
23 contributed manifested waste to the BKK Class I Facility. This manifested waste
24 contained Hazardous Substances that Defendant EME Corp. generated and/or
25 arranged for its disposal at the BKK Class I Facility. To date, Defendant EME
26 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
27 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

28 192. Upon information and belief, Defendant Emerald Equities is the

1 successor to Merel Co. Inc. and/or otherwise liable for manifested waste that was
2 contributed to the BKK Class I Facility by Merel Co. Inc. According to historical
3 BKK Corp. records, Merel Co. Inc. contributed manifested waste to the BKK Class
4 I Facility. This manifested waste contained Hazardous Substances that Merel Co.
5 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
6 Defendant Emerald Equities has not incurred any costs at the BKK Class I Facility
7 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
8 Facility.

9 193. According to historical BKK Corp. records, Defendant Emerson
10 Electric Co. contributed manifested waste to the BKK Class I Facility. This
11 manifested waste contained Hazardous Substances that Defendant Emerson Electric
12 Co. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
13 Defendant Emerson Electric Co. has not incurred any costs at the BKK Class I
14 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
15 Class I Facility.

16 194. Upon information and belief, Defendant Emerson Electric Co. is the
17 successor to Beckman Coulter Inc. and/or otherwise liable for manifested waste that
18 was contributed to the BKK Class I Facility by Beckman Coulter Inc. According to
19 historical BKK Corp. records, Beckman Coulter Inc. contributed manifested waste
20 to the BKK Class I Facility. This manifested waste contained Hazardous
21 Substances that Beckman Coulter Inc. generated and/or arranged for its disposal at
22 the BKK Class I Facility. To date, Defendant Emerson Electric Co. has not incurred
23 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
24 by the Plaintiffs at the BKK Class I Facility.

25 195. According to historical BKK Corp. records, Defendant Emery
26 Industries Inc. contributed manifested waste to the BKK Class I Facility. This
27 manifested waste contained Hazardous Substances that Defendant Emery Industries
28 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,

1 Defendant Emery Industries Inc. has not incurred any costs at the BKK Class I
2 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
3 Class I Facility.

4 196. Upon information and belief, Defendant Employbridge LLC is the
5 successor to Heist Maintenance Services Inc. and/or otherwise liable for manifested
6 waste that was contributed to the BKK Class I Facility by Heist Maintenance
7 Services Inc. According to historical BKK Corp. records, Heist Maintenance
8 Services Inc. contributed manifested waste to the BKK Class I Facility. This
9 manifested waste contained Hazardous Substances that Heist Maintenance Services
10 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
11 Defendant Employbridge LLC has not incurred any response costs at the BKK
12 Class I Facility nor has it paid its fair share of response costs incurred by the
13 Plaintiffs at the BKK Class I Facility.

14 197. Upon information and belief, Defendant Emrise Electronics Corp. is
15 the successor to Arnold Circuits, Inc. and/or Arnold Electronics Inc. and/or
16 otherwise liable for manifested waste that was contributed to the BKK Class I
17 Facility by Arnold Circuits, Inc. and/or Arnold Electronics Inc. According to
18 historical BKK Corp. records, Arnold Circuits, Inc. and Arnold Electronics Inc.
19 contributed manifested waste to the BKK Class I Facility. This manifested waste
20 contained Hazardous Substances that Arnold Circuits, Inc. and Arnold Electronics
21 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
22 Defendant Emrise Electronics Corp. has not incurred any costs at the BKK Class I
23 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
24 Class I Facility.

25 198. According to historical BKK Corp. records, Defendant Energy
26 Development Co. Inc. contributed manifested waste to the BKK Class I Facility.
27 This manifested waste contained Hazardous Substances that Defendant Energy
28 Development Co. Inc. generated and/or arranged for its disposal at the BKK Class I

1 Facility. To date, Defendant Energy Development Co. Inc. has not incurred any
2 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
3 the Plaintiffs at the BKK Class I Facility.

4 199. According to historical BKK Corp. records, Defendant Environmental
5 Control Systems Inc. contributed manifested waste to the BKK Class I Facility.
6 This manifested waste contained Hazardous Substances that Defendant
7 Environmental Control Systems Inc. generated and/or arranged for its disposal at
8 the BKK Class I Facility. To date, Defendant Environmental Control Systems Inc.
9 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
10 of costs incurred by the Plaintiffs at the BKK Class I Facility.

11 200. Upon information and belief, Defendant Epec Oil Co. Liquidating
12 Trust is the successor to Tenneco Oil Co. and/or otherwise liable for manifested
13 waste that was contributed to the BKK Class I Facility by Tenneco Oil Co.
14 According to historical BKK Corp. records, Tenneco Oil Co. contributed
15 manifested waste to the BKK Class I Facility. This manifested waste contained
16 Hazardous Substances that Tenneco Oil Co. generated and/or arranged for its
17 disposal at the BKK Class I Facility. To date, Defendant Epec Oil Co. Liquidating
18 Trust has not incurred any costs at the BKK Class I Facility nor has it paid its fair
19 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

20 201. According to historical BKK Corp. records, Defendant Fairchild
21 Industries contributed manifested waste to the BKK Class I Facility. This
22 manifested waste contained Hazardous Substances that Defendant Fairchild
23 Industries generated and/or arranged for its disposal at the BKK Class I Facility. To
24 date, Defendant Fairchild Industries has not incurred any costs at the BKK Class I
25 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
26 Class I Facility.

27 202. According to historical BKK Corp. records, Defendant Federal
28 Express Corporation contributed manifested waste to the BKK Class I Facility.

1 This manifested waste contained Hazardous Substances that Defendant Federal
2 Express Corporation generated and/or arranged for its disposal at the BKK Class I
3 Facility. To date, Defendant Federal Express Corporation has not incurred any
4 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
5 the Plaintiffs at the BKK Class I Facility.

6 203. Upon information and belief, Defendant Federal Express Corporation
7 is the successor to Flying Tigers Line and/or otherwise liable for manifested waste
8 that was contributed to the BKK Class I Facility by Flying Tigers Line. According
9 to historical BKK Corp. records, Flying Tigers Line contributed manifested waste
10 to the BKK Class I Facility. This manifested waste contained Hazardous
11 Substances that Flying Tigers Line generated and/or arranged for its disposal at the
12 BKK Class I Facility. To date, Defendant Federal Express Corporation has not
13 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
14 incurred by the Plaintiffs at the BKK Class I Facility.

15 204. According to historical BKK Corp. records, Defendant Federal
16 Reserve Bank contributed manifested waste to the BKK Class I Facility. This
17 manifested waste contained Hazardous Substances that Defendant Federal Reserve
18 Bank generated and/or arranged for its disposal at the BKK Class I Facility. To
19 date, Defendant Federal Reserve Bank has not incurred any costs at the BKK Class
20 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
21 Class I Facility.

22 205. According to historical BKK Corp. records, Defendant Fiberite West
23 Coast Corp. contributed manifested waste to the BKK Class I Facility. This
24 manifested waste contained Hazardous Substances that Defendant Fiberite West
25 Coast Corp. generated and/or arranged for its disposal at the BKK Class I Facility.
26 To date, Defendant Fiberite West Coast Corp. has not incurred any costs at the
27 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
28 at the BKK Class I Facility.

1 206. According to historical BKK Corp. records, Defendant Firestone Tire
2 & Rubber Co. contributed manifested waste to the BKK Class I Facility. This
3 manifested waste contained Hazardous Substances that Defendant Firestone Tire &
4 Rubber Co. generated and/or arranged for its disposal at the BKK Class I Facility.
5 To date, Defendant Firestone Tire & Rubber Co. has not incurred any costs at the
6 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
7 at the BKK Class I Facility.

8 207. According to historical BKK Corp. records, Defendant Fletcher Oil &
9 Refining Co. contributed manifested waste to the BKK Class I Facility. This
10 manifested waste contained Hazardous Substances that Defendant Fletcher Oil &
11 Refining Co. generated and/or arranged for its disposal at the BKK Class I Facility.
12 To date, Defendant Fletcher Oil & Refining Co. has not incurred any costs at the
13 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
14 at the BKK Class I Facility.

15 208. According to historical BKK Corp. records, Defendant Flight
16 Accessory Service contributed manifested waste to the BKK Class I Facility. This
17 manifested waste contained Hazardous Substances that Defendant Flight Accessory
18 Service generated and/or arranged for its disposal at the BKK Class I Facility. To
19 date, Defendant Flight Accessory Service has not incurred any costs at the BKK
20 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
21 BKK Class I Facility.

22 209. Upon information and belief, Defendant Flowserve Corporation is the
23 successor to Byron Jackson Pumps and/or Borg Warner and/or otherwise liable for
24 manifested waste that was contributed to the BKK Class I Facility by Byron
25 Jackson Pumps and/or Borg Warner. According to historical BKK Corp. records,
26 Byron Jackson Pumps and Borg Warner contributed manifested waste to the BKK
27 Class I Facility. This manifested waste contained Hazardous Substances that Byron
28 Jackson Pumps and Borg Warner generated and/or arranged for its disposal at the

1 BKK Class I Facility. To date, Defendant Flowserve Corporation has not incurred
2 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
3 by the Plaintiffs at the BKK Class I Facility.

4 210. According to historical BKK Corp. records, Defendant Fotomat Labs
5 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
6 waste contained Hazardous Substances that Defendant Fotomat Labs Inc. generated
7 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
8 Fotomat Labs Inc. has not incurred any costs at the BKK Class I Facility nor has it
9 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 211. According to historical BKK Corp. records, Defendant Flying Tigers
11 Line contributed manifested waste to the BKK Class I Facility. This manifested
12 waste contained Hazardous Substances that Defendant Flying Tigers Line generated
13 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
14 Flying Tigers Line has not incurred any costs at the BKK Class I Facility nor has it
15 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

16 212. According to historical BKK Corp. records, Defendant Franciscan
17 Ceramics Inc. contributed manifested waste to the BKK Class I Facility. This
18 manifested waste contained Hazardous Substances that Defendant Franciscan
19 Ceramics Inc. generated and/or arranged for its disposal at the BKK Class I
20 Facility. To date, Defendant Franciscan Ceramics Inc. has not incurred any costs at
21 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
22 Plaintiffs at the BKK Class I Facility.

23 213. According to historical BKK Corp. records, Defendant Frazee
24 Industries contributed manifested waste to the BKK Class I Facility. This
25 manifested waste contained Hazardous Substances that Defendant Frazee Industries
26 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
27 Defendant Frazee Industries has not incurred any costs at the BKK Class I Facility
28 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I

1 Facility.

2 214. Upon information and belief, Defendant Friction Inc. is the successor
3 to Friction Materials Corp. and/or otherwise liable for manifested waste that was
4 contributed to the BKK Class I Facility by Friction Materials Corp. According to
5 historical BKK Corp. records, Friction Materials Corp. contributed manifested
6 waste to the BKK Class I Facility. This manifested waste contained Hazardous
7 Substances that Friction Materials Corp. generated and/or arranged for its disposal
8 at the BKK Class I Facility. To date, Defendant Friction Inc. has not incurred any
9 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
10 the Plaintiffs at the BKK Class I Facility.

11 215. According to historical BKK Corp. records, Defendant Friction
12 Materials Corp. contributed manifested waste to the BKK Class I Facility. This
13 manifested waste contained Hazardous Substances that Defendant Friction
14 Materials Corp. generated and/or arranged for its disposal at the BKK Class I
15 Facility. To date, Defendant Friction Materials Corp. has not incurred any costs at
16 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
17 Plaintiffs at the BKK Class I Facility.

18 216. According to historical BKK Corp. records, Defendant FMC
19 Corporation contributed manifested waste to the BKK Class I Facility. This
20 manifested waste contained Hazardous Substances that Defendant FMC
21 Corporation generated and/or arranged for its disposal at the BKK Class I Facility.
22 To date, Defendant FMC Corporation has not incurred any costs at the BKK Class I
23 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
24 Class I Facility.

25 217. According to historical BKK Corp. records, Defendant Ford
26 Aerospace and Communications Corp. contributed manifested waste to the BKK
27 Class I Facility. This manifested waste contained Hazardous Substances that
28 Defendant Ford Aerospace and Communications Corp. generated and/or arranged

1 for its disposal at the BKK Class I Facility. To date, Defendant Ford Aerospace
2 and Communications Corp. has not incurred any costs at the BKK Class I Facility
3 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
4 Facility.

5 218. Upon information and belief, Defendant Fort James LLC is the
6 successor to Western Lithograph and/or otherwise liable for manifested waste that
7 was contributed to the BKK Class I Facility by Western Lithograph. According to
8 historical BKK Corp. records, Western Lithograph contributed manifested waste to
9 the BKK Class I Facility. This manifested waste contained Hazardous Substances
10 that Western Lithograph generated and/or arranged for its disposal at the BKK
11 Class I Facility. To date, Defendant Fort James LLC has not incurred any costs at
12 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
13 Plaintiffs at the BKK Class I Facility.

14 219. According to historical BKK Corp. records, Defendant Foster-Forbes
15 Glass Co. contributed manifested waste to the BKK Class I Facility. This
16 manifested waste contained Hazardous Substances that Defendant Foster-Forbes
17 Glass Co. generated and/or arranged for its disposal at the BKK Class I Facility.
18 To date, Defendant Foster-Forbes Glass Co. has not incurred any response costs at
19 the BKK Class I Facility nor has it paid Its fair share of response costs incurred by
20 the Plaintiffs at the BKK Class I Facility.

21 220. Upon information and belief, Defendant Frontier California, Inc. is the
22 successor to General Telephone Co. and/or otherwise liable for manifested waste
23 that was contributed to the BKK Class I Facility by General Telephone Co.
24 According to historical BKK Corp. records, General Telephone Co. contributed
25 manifested waste to the BKK Class I Facility. This manifested waste contained
26 Hazardous Substances that General Telephone Co. generated and/or arranged for its
27 disposal at the BKK Class I Facility. To date, Defendant Frontier California, Inc.
28 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share

1 of costs incurred by the Plaintiffs at the BKK Class I Facility.

2 221. According to historical BKK Corp. records, Defendant Gates Admiral
3 contributed manifested waste to the BKK Class I Facility. This manifested waste
4 contained Hazardous Substances that Defendant Gates Admiral generated and/or
5 arranged for its disposal at the BKK Class I Facility. To date, Defendant Gates
6 Admiral has not incurred any costs at the BKK Class I Facility nor has it paid its
7 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

8 222. According to historical BKK Corp. records, Defendant GATX
9 contributed manifested waste to the BKK Class I Facility. This manifested waste
10 contained Hazardous Substances that Defendant GATX generated and/or arranged
11 for its disposal at the BKK Class I Facility. To date, Defendant GATX has not
12 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
13 incurred by the Plaintiffs at the BKK Class I Facility.

14 223. Upon information and belief, Defendant GATX Corp. is the successor
15 to GATX and/or otherwise liable for manifested waste that was contributed to the
16 BKK Class I Facility by GATX. According to historical BKK Corp. records,
17 GATX contributed manifested waste to the BKK Class I Facility. This manifested
18 waste contained Hazardous Substances that GATX generated and/or arranged for
19 its disposal at the BKK Class I Facility. To date, Defendant GATX Corp. has not
20 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
21 incurred by the Plaintiffs at the BKK Class I Facility.

22 224. Upon information and belief, Defendant GATX Terminals Corp. is the
23 successor to GATX and/or otherwise liable for manifested waste that was
24 contributed to the BKK Class I Facility by GATX. According to historical BKK
25 Corp. records, GATX contributed manifested waste to the BKK Class I Facility.
26 This manifested waste contained Hazardous Substances that GATX generated
27 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
28 GATX Terminals Corp. has not incurred any costs at the BKK Class I Facility nor

1 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
2 Facility.

3 225. According to historical BKK Corp. records, Defendant GE Betz, Inc.
4 fka Betz Laboratories, Inc. contributed manifested waste to the BKK Class I
5 Facility. This manifested waste contained Hazardous Substances that Defendant
6 GE Betz, Inc. fka Betz Laboratories, Inc. generated and/or arranged for its disposal
7 at the BKK Class I Facility. To date, Defendant GE Betz, Inc. fka Betz
8 Laboratories, Inc. has not incurred any costs at the BKK Class I Facility nor has it
9 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 226. According to historical BKK Corp. records, Defendant General
11 Battery Corp. contributed manifested waste to the BKK Class I Facility. This
12 manifested waste contained Hazardous Substances that Defendant General Battery
13 Corp. generated and/or arranged for its disposal at the BKK Class I Facility. To
14 date, Defendant General Battery Corp. has not incurred any costs at the BKK Class
15 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
16 Class I Facility.

17 227. Upon information and belief, Defendant General Mills, Inc. is the
18 successor to Pillsbury Co. and/or otherwise liable for manifested waste that was
19 contributed to the BKK Class I Facility by Pillsbury Co. According to historical
20 BKK Corp. records, Pillsbury Co. contributed manifested waste to the BKK Class I
21 Facility. This manifested waste contained Hazardous Substances that Pillsbury Co.
22 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
23 Defendant General Mills, Inc. has not incurred any costs at the BKK Class I
24 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
25 Class I Facility.

26 228. Upon information and belief, Defendant General Mills, Inc. is the
27 successor to Yoplait USA and/or otherwise liable for manifested waste that was
28 contributed to the BKK Class I Facility by Yoplait USA. According to historical

1 BKK Corp. records, Yoplait USA contributed manifested waste to the BKK Class I
2 Facility. This manifested waste contained Hazardous Substances that Yoplait USA
3 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
4 Defendant General Mills, Inc. has not incurred any costs at the BKK Class I
5 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
6 Class I Facility.

7 229. According to historical BKK Corp. records, Defendant General
8 Telephone Co. contributed manifested waste to the BKK Class I Facility. This
9 manifested waste contained Hazardous Substances that Defendant General
10 Telephone Co. generated and/or arranged for its disposal at the BKK Class I
11 Facility. To date, Defendant General Telephone Co. has not incurred any costs at
12 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
13 Plaintiffs at the BKK Class I Facility.

14 230. According to historical BKK Corp. records, Defendant Genstar
15 Building Materials Co. contributed manifested waste to the BKK Class I Facility.
16 This manifested waste contained Hazardous Substances that Defendant Genstar
17 Building Materials Co. generated and/or arranged for its disposal at the BKK Class
18 I Facility. To date, Defendant Genstar Building Materials Co. has not incurred any
19 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
20 the Plaintiffs at the BKK Class I Facility.

21 231. Upon information and belief, Defendant Genstar Roofing Products
22 Company, Inc. is the successor to Genstar Building Materials Co. and/or otherwise
23 liable for manifested waste that was contributed to the BKK Class I Facility by
24 Genstar Building Materials Co. According to historical BKK Corp. records,
25 Genstar Building Materials Co. contributed manifested waste to the BKK Class I
26 Facility. This manifested waste contained Hazardous Substances that Genstar
27 Building Materials Co. generated and/or arranged for its disposal at the BKK Class
28 I Facility. To date, Defendant Genstar Roofing Products Company, Inc. has not

1 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
2 incurred by the Plaintiffs at the BKK Class I Facility.

3 232. Upon information and belief, Defendant Georgia-Pacific LLC is the
4 successor to Crown Zellerbach Co. and/or otherwise liable for manifested waste
5 that was contributed to the BKK Class I Facility by Crown Zellerbach Co.
6 According to historical BKK Corp. records, Crown Zellerbach Co. contributed
7 manifested waste to the BKK Class I Facility. This manifested waste contained
8 Hazardous Substances that Crown Zellerbach Co. generated and/or arranged for its
9 disposal at the BKK Class I Facility. To date, Defendant Georgia-Pacific LLC has
10 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
11 costs incurred by the Plaintiffs at the BKK Class I Facility.

12 233. Upon information and belief, Defendant Georgia-Pacific LLC is the
13 successor to Western Lithograph and/or otherwise liable for manifested waste that
14 was contributed to the BKK Class I Facility by Western Lithograph According to
15 historical BKK Corp. records, Western Lithograph contributed manifested waste to
16 the BKK Class I Facility. This manifested waste contained Hazardous Substances
17 that Western Lithograph generated and/or arranged for its disposal at the BKK
18 Class I Facility. To date, Defendant Georgia-Pacific LLC has not incurred any costs
19 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
20 Plaintiffs at the BKK Class I Facility.

21 234. Upon information and belief, Defendant Gerald California LLC is the
22 successor to PGP Industries Inc. and/or otherwise liable for manifested waste that
23 was contributed to the BKK Class I Facility by PGP Industries Inc. According to
24 historical BKK Corp. records, PGP Industries Inc. contributed manifested waste to
25 the BKK Class I Facility. This manifested waste contained Hazardous Substances
26 that PGP Industries Inc. generated and/or arranged for its disposal at the BKK Class
27 I Facility. To date, Gerald California LLC has not incurred any costs at the BKK
28 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the

1 BKK Class I Facility.

2 235. Upon information and belief, Defendant Gerald Metals, Inc. is the
3 successor to PGP Industries Inc. and/or otherwise liable for manifested waste that
4 was contributed to the BKK Class I Facility by PGP Industries Inc. According to
5 historical BKK Corp. records, PGP Industries Inc. contributed manifested waste to
6 the BKK Class I Facility. This manifested waste contained Hazardous Substances
7 that PGP Industries Inc. generated and/or arranged for its disposal at the BKK Class
8 I Facility. To date, Gerald Metals, Inc. has not incurred any costs at the BKK Class
9 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
10 Class I Facility.

11 236. According to historical BKK Corp. records, Defendant Glass
12 Containers Corp. contributed manifested waste to the BKK Class I Facility. This
13 manifested waste contained Hazardous Substances that Defendant Glass Containers
14 Corp. generated and/or arranged for its disposal at the BKK Class I Facility. To
15 date, Defendant Glass Containers Corp. has not incurred any costs at the BKK
16 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
17 BKK Class I Facility.

18 237. According to historical BKK Corp. records, Defendant Glasteel
19 contributed manifested waste to the BKK Class I Facility. This manifested waste
20 contained Hazardous Substances that Defendant Glasteel generated and/or arranged
21 for its disposal at the BKK Class I Facility. To date, Defendant Glasteel has not
22 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
23 incurred by the Plaintiffs at the BKK Class I Facility.

24 238. According to historical BKK Corp. records, Defendant Global Tube
25 Corporation contributed manifested waste to the BKK Class I Facility. This
26 manifested waste contained Hazardous Substances that Defendant Global Tube
27 Corporation generated and/or arranged for its disposal at the BKK Class I Facility.
28 To date, Defendant Global Tube Corporation has not incurred any costs at the BKK

1 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
2 BKK Class I Facility.

3 239. According to historical BKK Corp. records, Defendant Gray Truck
4 Lines contributed manifested waste to the BKK Class I Facility. This manifested
5 waste contained Hazardous Substances that Defendant Gray Truck Lines generated
6 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
7 Gray Truck Lines has not incurred any costs at the BKK Class I Facility nor has it
8 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

9 240. According to historical BKK Corp. records, Defendant Greer
10 Hydraulics Inc. contributed manifested waste to the BKK Class I Facility. This
11 manifested waste contained Hazardous Substances that Defendant Greer Hydraulics
12 Corp. generated and/or arranged for its disposal at the BKK Class I Facility. To
13 date, Defendant Greer Hydraulics Corp. has not incurred any response costs at the
14 BKK Class I Facility nor has it paid its fair share of response costs incurred by the
15 Plaintiffs at the BKK Class I Facility.

16 241. Reserved.

17 242. Upon information and belief, Defendant Grupo Mexico SAB de CV is
18 the successor to Cia Minera De Cananea SA and/or otherwise liable for manifested
19 waste that was contributed to the BKK Class I Facility by Cia Minera De Cananea
20 SA. According to historical BKK Corp. records, Cia Minera De Cananea SA
21 contributed manifested waste to the BKK Class I Facility. This manifested waste
22 contained Hazardous Substances that Cia Minera De Cananea SA generated and/or
23 arranged for its disposal at the BKK Class I Facility. To date, Defendant Grupo
24 Mexico SAB de CV has not incurred any costs at the BKK Class I Facility nor has
25 it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

26 243. According to historical BKK Corp. records, Defendant Guaranteed
27 Products Inc. contributed manifested waste to the BKK Class I Facility. This
28 manifested waste contained Hazardous Substances that Defendant Guaranteed

1 Products Inc. generated and/or arranged for its disposal at the BKK Class I Facility.
2 To date, Defendant Guaranteed Products Inc. has not incurred any costs at the BKK
3 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
4 BKK Class I Facility.

5 244. Upon information and belief, Defendant GWB (US), Inc. is the
6 successor to Networks Electronic and/or otherwise liable for manifested waste that
7 was contributed to the BKK Class I Facility by Networks Electronic. According to
8 historical BKK Corp. records, Networks Electronic contributed manifested waste to
9 the BKK Class I Facility. This manifested waste contained Hazardous Substances
10 that Networks Electronic generated and/or arranged for its disposal at the BKK
11 Class I Facility. To date, Defendant GWB (US), Inc. has not incurred any costs at
12 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
13 Plaintiffs at the BKK Class I Facility.

14 245. According to historical BKK Corp. records, Defendant Hallmark
15 Circuits Inc. contributed manifested waste to the BKK Class I Facility. This
16 manifested waste contained Hazardous Substances that Defendant Hallmark
17 Circuits Inc. generated and/or arranged for its disposal at the BKK Class I Facility.
18 To date, Defendant Hallmark Circuits Inc. has not incurred any costs at the BKK
19 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
20 BKK Class I Facility.

21 246. According to historical BKK Corp. records, Defendant Halstead
22 Enterprises contributed manifested waste to the BKK Class I Facility. This
23 manifested waste contained Hazardous Substances that Defendant Halstead
24 Enterprises generated and/or arranged for its disposal at the BKK Class I Facility.
25 To date, Defendant Halstead Enterprises has not incurred any costs at the BKK
26 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
27 BKK Class I Facility.

28 247. Upon information and belief, Defendant Handy & Harman is the

1 successor to American Chemical & Refining and/or otherwise liable for manifested
2 waste that was contributed to the BKK Class I Facility by American Chemical &
3 Refining. According to historical BKK Corp. records, American Chemical &
4 Refining contributed manifested waste to the BKK Class I Facility. This manifested
5 waste contained Hazardous Substances that American Chemical & Refining
6 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
7 Defendant Handy & Harman has not incurred any costs at the BKK Class I Facility
8 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
9 Facility.

10 248. Upon information and belief, Defendant Harsco Corporation is the
11 successor to Structural Composite Industries and/or otherwise liable for manifested
12 waste that was contributed to the BKK Class I Facility by Structural Composite
13 Industries. According to historical BKK Corp. records, Structural Composite
14 Industries contributed manifested waste to the BKK Class I Facility. This
15 manifested waste contained Hazardous Substances that Structural Composite
16 Industries generated and/or arranged for its disposal at the BKK Class I Facility. To
17 date, Defendant Harsco Corporation has not incurred any costs at the BKK Class I
18 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
19 Class I Facility.

20 249. Upon information and belief, Defendant Hawker Pacific Aerospace is
21 the successor to Flight Accessory Service and/or otherwise liable for manifested
22 waste that was contributed to the BKK Class I Facility by Flight Accessory Service.
23 According to historical BKK Corp. records, Flight Accessor Service contributed
24 manifested waste to the BKK Class I Facility. This manifested waste contained
25 Hazardous Substances that Flight Accessory Service generated and/or arranged for
26 its disposal at the BKK Class I Facility. To date, Defendant Hawker Pacific
27 Aerospace has not incurred any costs at the BKK Class I Facility nor has it paid its
28 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 250. Upon information and belief, Defendant Heinz Foods is the successor
2 to CHB Foods and/or otherwise liable for manifested waste that was contributed to
3 the BKK Class I Facility by CHB Foods. According to historical BKK Corp.
4 records, CHB Foods contributed manifested waste to the BKK Class I Facility. This
5 manifested waste contained Hazardous Substances that CHB Foods generated
6 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
7 Heinz Foods has not incurred any response costs at the BKK Class I Facility nor
8 has it paid its fair share of response costs incurred by the Plaintiffs at the BKK
9 Class I Facility.

10 251. According to historical BKK Corp. records, Defendant Heist
11 Maintenance Services Inc. contributed manifested waste to the BKK Class I
12 Facility. This manifested waste contained Hazardous Substances that Defendant
13 Heist Maintenance Services Inc. generated and/or arranged for its disposal at the
14 BKK Class I Facility. To date, Defendant Heist Maintenance Services Inc. has not
15 incurred any response costs at the BKK Class I Facility nor has it paid its fair share
16 of response costs incurred by the Plaintiffs at the BKK Class I Facility.

17 252. According to historical BKK Corp. records, Defendant Henry Soss &
18 Co. Inc. contributed manifested waste to the BKK Class I Facility. This manifested
19 waste contained Hazardous Substances that Defendant Henry Soss & Co. Inc.
20 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
21 Defendant Henry Soss & Co. Inc. has not incurred any costs at the BKK Class I
22 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
23 Class I Facility.

24 253. Upon information and belief, Defendant Hess Corporation is the
25 successor to American Pacific International Inc. and/or otherwise liable for
26 manifested waste that was contributed to the BKK Class I Facility by American
27 Pacific International Inc. According to historical BKK Corp. records, American
28 Pacific International Inc. contributed manifested waste to the BKK Class I Facility.

1 This manifested waste contained Hazardous Substances that American Pacific
2 International Inc. generated and/or arranged for its disposal at the BKK Class I
3 Facility. To date, Defendant Hess Corporation has not incurred any costs at the
4 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
5 at the BKK Class I Facility.

6 254. According to historical BKK Corp. records, Defendant Hill Brothers
7 Chemical Co. contributed manifested waste to the BKK Class I Facility. This
8 manifested waste contained Hazardous Substances that Defendant Hill Brothers
9 Chemical Co. generated and/or arranged for its disposal at the BKK Class I
10 Facility. To date, Defendant Hill Brothers Chemical Co. has not incurred any costs
11 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
12 Plaintiffs at the BKK Class I Facility.

13 255. According to historical BKK Corp. records, Defendant Hillcrest
14 Beverly Oil Corp. contributed manifested waste to the BKK Class I Facility. This
15 manifested waste contained Hazardous Substances that Defendant Hillcrest Beverly
16 Oil Corp. generated and/or arranged for its disposal at the BKK Class I Facility. To
17 date, Defendant Hillcrest Beverly Oil Corp. has not incurred any costs at the BKK
18 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
19 BKK Class I Facility.

20 256. According to historical BKK Corp. records, Defendant Hi-Shear Corp.
21 contributed manifested waste to the BKK Class I Facility. This manifested waste
22 contained Hazardous Substances that Defendant Hi-Shear Corp. generated and/or
23 arranged for its disposal at the BKK Class I Facility. To date, Defendant Hi-Shear
24 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
25 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

26 257. According to historical BKK Corp. records, Defendant Hoffman
27 Electronics contributed manifested waste to the BKK Class I Facility. This
28 manifested waste contained Hazardous Substances that Defendant Hoffman

1 Electronics generated and/or arranged for its disposal at the BKK Class I Facility.
2 To date, Defendant Hoffman Electronics has not incurred any costs at the BKK
3 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
4 BKK Class I Facility.

5 258. According to historical BKK Corp. records, Defendant Hollytex
6 Carpet Mills, Inc. contributed manifested waste to the BKK Class I Facility. This
7 manifested waste contained Hazardous Substances that Defendant Hollytex Carpet
8 Mills, Inc. generated and/or arranged for its disposal at the BKK Class I Facility.
9 To date, Defendant Hollytex Carpet Mills, Inc. has not incurred any costs at the
10 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
11 at the BKK Class I Facility.

12 259. Upon information and belief, Defendant Howmet Aerospace Inc. is the
13 successor to Kaynar Manufacturing Co., TRE Corp. and/or Weslock Corp. and/or
14 otherwise liable for manifested waste that was contributed to the BKK Class I
15 Facility by Kaynar Manufacturing Co., TRE Corp. and/or Weslock Corp.
16 According to historical BKK Corp. records, Kaynar Manufacturing Co., TRE Corp.
17 and Weslock Corp. contributed manifested waste to the BKK Class I Facility. This
18 manifested waste contained Hazardous Substances that Kaynar Manufacturing Co.,
19 TRE Corp. and Weslock generated and/or arranged for its disposal at the BKK
20 Class I Facility. To date, Defendant Howmet Aerospace Inc. has not incurred any
21 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
22 the Plaintiffs at the BKK Class I Facility.

23 260. Upon information and belief, Defendant Hoya Corporation USA is the
24 successor to Electronic Materials Corp. and/or otherwise liable for manifested
25 waste that was contributed to the BKK Class I Facility by Electronic Materials
26 Corp. According to historical BKK Corp. records, Electronic Materials Corp.
27 contributed manifested waste to the BKK Class I Facility. This manifested waste
28 contained Hazardous Substances that Electronic Materials Corp. generated and/or

1 arranged for its disposal at the BKK Class I Facility. To date, Defendant Hoya
2 Corporation USA has not incurred any costs at the BKK Class I Facility nor has it
3 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

4 261. According to historical BKK Corp. records, Defendant HR Textron
5 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
6 waste contained Hazardous Substances that Defendant HR Textron Inc. generated
7 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant HR
8 Textron Inc. has not incurred any costs at the BKK Class I Facility nor has it paid
9 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 262. Upon information and belief, Defendant HTW Industries Inc. is the
11 successor to Durex Inc. and/or otherwise liable for manifested waste that was
12 contributed to the BKK Class I Facility by Durex Inc. According to historical BKK
13 Corp. records, Durex Inc. contributed manifested waste to the BKK Class I Facility.
14 This manifested waste contained Hazardous Substances that Durex Inc. generated
15 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
16 HTW Industries Inc. has not incurred any costs at the BKK Class I Facility nor has
17 it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

18 263. According to historical BKK Corp. records, Defendant Humco
19 Products contributed manifested waste to the BKK Class I Facility. This manifested
20 waste contained Hazardous Substances that Defendant Humco Products generated
21 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
22 Humco Products has not incurred any costs at the BKK Class I Facility nor has it
23 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 264. Upon information and belief, Defendant Hutchinson Aerospace &
25 Industry, Inc. is the successor to Barry Wright Controls and/or otherwise liable for
26 manifested waste that was contributed to the BKK Class I Facility by Barry Wright
27 Controls. According to historical BKK Corp. records, Barry Wright Controls
28 contributed manifested waste to the BKK Class I Facility. This manifested waste

1 contained Hazardous Substances that Barry Wright Controls generated and/or
2 arranged for its disposal at the BKK Class I Facility. To date, Defendant
3 Hutchinson Aerospace & Industry, Inc. has not incurred any costs at the BKK Class
4 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
5 Class I Facility.

6 265. According to historical BKK Corp. records, Defendant Hydraulic
7 Units Inc. contributed manifested waste to the BKK Class I Facility. This
8 manifested waste contained Hazardous Substances that Defendant Hydraulic Units
9 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
10 Defendant Hydraulic Units Inc. has not incurred any costs at the BKK Class I
11 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
12 Class I Facility.

13 266. According to historical BKK Corp. records, Defendant ICN
14 Pharmaceuticals contributed manifested waste to the BKK Class I Facility. This
15 manifested waste contained Hazardous Substances that Defendant ICN
16 Pharmaceuticals generated and/or arranged for its disposal at the BKK Class I
17 Facility. To date, Defendant ICN Pharmaceuticals has not incurred any costs at the
18 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
19 at the BKK Class I Facility.

20 267. Upon information and belief, Defendant ICX Industries, Inc. is the
21 successor to JCX and/or otherwise liable for manifested waste that was contributed
22 to the BKK Class I Facility by JCX. According to historical BKK Corp. records,
23 JCX contributed manifested waste to the BKK Class I Facility. This manifested
24 waste contained Hazardous Substances that JCX generated and/or arranged for its
25 disposal at the BKK Class I Facility. To date, Defendant ICX Industries, Inc. has
26 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
27 costs incurred by the Plaintiffs at the BKK Class I Facility.

28 268. Upon information and belief, Defendant ICX National, Inc. is the

1 successor to JCX and/or otherwise liable for manifested waste that was contributed
2 to the BKK Class I Facility by JCX. According to historical BKK Corp. records,
3 JCX contributed manifested waste to the BKK Class I Facility. This manifested
4 waste contained Hazardous Substances that JCX generated and/or arranged for its
5 disposal at the BKK Class I Facility. To date, Defendant ICX National, Inc. has not
6 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
7 incurred by the Plaintiffs at the BKK Class I Facility.

8 269. According to historical BKK Corp. records, Defendant Imco Services
9 contributed manifested waste to the BKK Class I Facility. This manifested waste
10 contained Hazardous Substances that Defendant Imco Services generated and/or
11 arranged for its disposal at the BKK Class I Facility. To date, Defendant Imco
12 Services has not incurred any costs at the BKK Class I Facility nor has it paid its
13 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

14 270. Upon information and belief, Defendant IMI Critical Engineering LLC
15 is the successor to Control Components Inc. and/or otherwise liable for manifested
16 waste that was contributed to the BKK Class I Facility by Control Components Inc.
17 According to historical BKK Corp. records, Control Components Inc. contributed
18 manifested waste to the BKK Class I Facility. This manifested waste contained
19 Hazardous Substances that Control Components Inc. generated and/or arranged for
20 its disposal at the BKK Class I Facility. To date, Defendant IMI Critical
21 Engineering LLC. has not incurred any costs at the BKK Class I Facility nor has it
22 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 271. According to historical BKK Corp. records, Defendant Industrial
24 Circuits contributed manifested waste to the BKK Class I Facility. This manifested
25 waste contained Hazardous Substances that Defendant Industrial Circuits generated
26 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
27 Industrial Circuits has not incurred any costs at the BKK Class I Facility nor has it
28 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 272. According to historical BKK Corp. records, Defendant Industrial
2 Insulations Incorporated contributed manifested waste to the BKK Class I Facility.
3 This manifested waste contained Hazardous Substances that Defendant Industrial
4 Insulations Incorporated generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant Industrial Insulations Incorporated has not
6 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
7 incurred by the Plaintiffs at the BKK Class I Facility.

8 273. According to historical BKK Corp. records, Defendant Industrial
9 Tectonics Bearings contributed manifested waste to the BKK Class I Facility. This
10 manifested waste contained Hazardous Substances that Defendant Industrial
11 Tectonics Bearings generated and/or arranged for its disposal at the BKK Class I
12 Facility. To date, Defendant Industrial Tectonics Bearings has not incurred any
13 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
14 the Plaintiffs at the BKK Class I Facility.

15 274. According to historical BKK Corp. records, Defendant Inland
16 Container Corp. contributed manifested waste to the BKK Class I Facility. This
17 manifested waste contained Hazardous Substances that Defendant Inland Container
18 Corp. generated and/or arranged for its disposal at the BKK Class I Facility. To
19 date, Defendant Inland Container Corp. has not incurred any costs at the BKK
20 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
21 BKK Class I Facility.

22 275. Upon information and belief, Defendant Inland Paperboard and
23 Packaging, Inc. is the successor to Inland Container Corp. and/or otherwise liable
24 for manifested waste that was contributed to the BKK Class I Facility by Inland
25 Container Corp. According to historical BKK Corp. records, Inland Container
26 Corp. contributed manifested waste to the BKK Class I Facility. This manifested
27 waste contained Hazardous Substances that Inland Container Corp. generated
28 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant

1 Inland Paperboard and Packaging, Inc. has not incurred any costs at the BKK Class
2 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
3 Class I Facility.

4 276. According to historical BKK Corp. records, Defendant International
5 Polymer Corp. contributed manifested waste to the BKK Class I Facility. This
6 manifested waste contained Hazardous Substances that Defendant International
7 Polymer Corp. generated and/or arranged for its disposal at the BKK Class I
8 Facility. To date, Defendant International Polymer Corp. has not incurred any
9 response costs at the BKK Class I Facility nor has it paid its fair share of response
10 costs incurred by the Plaintiffs at the BKK Class I Facility.

11 277. According to historical BKK Corp. records, Defendant I.T. Corp.
12 contributed manifested waste to the BKK Class I Facility. This manifested waste
13 contained Hazardous Substances that Defendant I.T. Corp. generated and/or
14 arranged for its disposal at the BKK Class I Facility. To date, Defendant I.T. Corp.
15 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
16 of costs incurred by the Plaintiffs at the BKK Class I Facility.

17 278. According to historical BKK Corp. records, Defendant ITT LLC
18 and/or its predecessor ITT Corp. contributed manifested waste to the BKK Class I
19 Facility. This manifested waste contained Hazardous Substances that Defendant
20 ITT LLC and/or its predecessor ITT Corp. generated and/or arranged for its
21 disposal at the BKK Class I Facility. To date, Defendant ITT LLC has not incurred
22 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
23 by the Plaintiffs at the BKK Class I Facility.

24 279. According to historical BKK Corp. records, Defendant J.C. Inc.
25 contributed manifested waste to the BKK Class I Facility. This manifested waste
26 contained Hazardous Substances that Defendant J.C. Inc. generated and/or arranged
27 for its disposal at the BKK Class I Facility. To date, Defendant J.C. Inc. has not
28 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs

1 incurred by the Plaintiffs at the BKK Class I Facility.

2 280. Upon information and belief, Defendant JCI Environmental Services is
3 the successor to J.C. Inc. and/or otherwise liable for manifested waste that was
4 contributed to the BKK Class I Facility by J.C. Inc. According to historical BKK
5 Corp. records, J.C. Inc. contributed manifested waste to the BKK Class I Facility.
6 This manifested waste contained Hazardous Substances that J.C. Inc. generated
7 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant JCI
8 Environmental Services has not incurred any costs at the BKK Class I Facility nor
9 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
10 Facility.

11 281. According to historical BKK Corp. records, Defendant JCX
12 contributed manifested waste to the BKK Class I Facility. This manifested waste
13 contained Hazardous Substances that Defendant JCX generated and/or arranged for
14 its disposal at the BKK Class I Facility. To date, Defendant JCX has not incurred
15 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
16 by the Plaintiffs at the BKK Class I Facility.

17 282. Upon information and belief, Defendant Jeld-Wen, Inc. is the
18 successor to Windowmaster Products and/or otherwise liable for manifested waste
19 that was contributed to the BKK Class I Facility by Windowmaster Products.
20 According to historical BKK Corp. records, Windowmaster Products contributed
21 manifested waste to the BKK Class I Facility. This manifested waste contained
22 Hazardous Substances that Windowmaster Products generated and/or arranged for
23 its disposal at the BKK Class I Facility. To date, Defendant Jeld-Wen, Inc. has not
24 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
25 incurred by the Plaintiffs at the BKK Class I Facility.

26 283. According to historical BKK Corp. records, Defendant Jersey Maid
27 Milk Products Inc. contributed manifested waste to the BKK Class I Facility. This
28 manifested waste contained Hazardous Substances that Defendant Jersey Maid

1 Milk Products Inc. generated and/or arranged for its disposal at the BKK Class I
2 Facility. To date, Defendant Jersey Maid Milk Products Inc. has not incurred any
3 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
4 the Plaintiffs at the BKK Class I Facility.

5 284. According to historical BKK Corp. records, Defendant Johnson
6 Controls Inc. contributed manifested waste to the BKK Class I Facility. This
7 manifested waste contained Hazardous Substances that Defendant Johnson Controls
8 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
9 Defendant Johnson Controls Inc. has not incurred any costs at the BKK Class I
10 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
11 Class I Facility.

12 285. According to historical BKK Corp. records, Defendant Johnston Pump
13 Co. contributed manifested waste to the BKK Class I Facility. This manifested
14 waste contained Hazardous Substances that Defendant Johnston Pump Co.
15 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
16 Defendant Johnston Pump Co. has not incurred any costs at the BKK Class I
17 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
18 Class I Facility.

19 286. According to historical BKK Corp. records, Defendant Jonathan
20 Manufacturing Corp. contributed manifested waste to the BKK Class I Facility.
21 This manifested waste contained Hazardous Substances that Defendant Jonathan
22 Manufacturing Corp. generated and/or arranged for its disposal at the BKK Class I
23 Facility. To date, Defendant Jonathan Manufacturing Corp. has not incurred any
24 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
25 the Plaintiffs at the BKK Class I Facility.

26 287. According to historical BKK Corp. records, Defendant Joslyn
27 Manufacturing & Supply Co. contributed manifested waste to the BKK Class I
28 Facility. This manifested waste contained Hazardous Substances that Defendant

1 Joslyn Manufacturing & Supply Co. generated and/or arranged for its disposal at
2 the BKK Class I Facility. To date, Defendant Joslyn Manufacturing & Supply Co.
3 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
4 of costs incurred by the Plaintiffs at the BKK Class I Facility.

5 288. According to historical BKK Corp. records, Defendant Kaiser
6 Foundation Health Plan, Inc. contributed manifested waste to the BKK Class I
7 Facility. This manifested waste contained Hazardous Substances that Defendant
8 Kaiser Foundation Health Plan, Inc. generated and/or arranged for its disposal at the
9 BKK Class I Facility. To date, Defendant Kaiser Foundation Health Plan, Inc. has
10 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
11 costs incurred by the Plaintiffs at the BKK Class I Facility.

12 289. According to historical BKK Corp. records, Defendant Kaiser Rollmet
13 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
14 waste contained Hazardous Substances that Defendant Kaiser Rollmet Inc.
15 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
16 Defendant Kaiser Rollmet Inc. has not incurred any costs at the BKK Class I
17 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
18 Class I Facility.

19 290. According to historical BKK Corp. records, Defendant Kaynar
20 Manufacturing Co. contributed manifested waste to the BKK Class I Facility. This
21 manifested waste contained Hazardous Substances that Defendant Kaynar
22 Manufacturing Co. generated and/or arranged for its disposal at the BKK Class I
23 Facility. To date, Defendant Kaynar Manufacturing Co. has not incurred any costs
24 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
25 Plaintiffs at the BKK Class I Facility.

26 291. Upon information and belief, Defendant Kerr-McGee Chemical
27 Worldwide LLC is the successor to Sun Exploration and/or otherwise liable for
28 manifested waste that was contributed to the BKK Class I Facility by Sun

1 Exploration. According to historical BKK Corp. records, Sun Exploration
2 contributed manifested waste to the BKK Class I Facility. This manifested waste
3 contained Hazardous Substances that Sun Exploration generated and/or arranged
4 for its disposal at the BKK Class I Facility. To date, Defendant Kerr-McGee
5 Chemical Worldwide LLC has not incurred any costs at the BKK Class I Facility
6 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
7 Facility.

8 292. According to historical BKK Corp. records, Defendant Keuffel &
9 Esser Co. contributed manifested waste to the BKK Class I Facility. This
10 manifested waste contained Hazardous Substances that Defendant Keuffel & Esser
11 Co. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
12 Defendant Keuffel & Esser Co. has not incurred any costs at the BKK Class I
13 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
14 Class I Facility.

15 293. According to historical BKK Corp. records, Defendant Kinder Morgan
16 Energy Partners, L.P. contributed manifested waste to the BKK Class I Facility.
17 This manifested waste contained Hazardous Substances that Defendant Kinder
18 Morgan Energy Partners, L.P. generated and/or arranged for its disposal at the BKK
19 Class I Facility. To date, Defendant Kinder Morgan Energy Partners, L.P. has not
20 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
21 incurred by the Plaintiffs at the BKK Class I Facility.

22 294. Upon information and belief, Defendant Kinder Morgan Energy
23 Partners, L.P. is the successor to Cal Nev Pipeline Co., GATX, GATX Terminals
24 Corp., Southern Pacific Pipe Lines, Inc. and/or Tenneco Oil Co. and/or otherwise
25 liable for manifested waste that was contributed to the BKK Class I Facility by Cal
26 Nev Pipeline Co., GATX, GATX Terminals Corp. Southern Pacific Pipe Lines, Inc.
27 and/or Tenneco Oil Co. According to historical BKK Corp. records, Cal Nev
28 Pipeline Co., GATX, GATX Terminals Corp., Southern Pacific Pipe Lines, Inc. and

1 Tenneco Oil Co. contributed manifested waste to the BKK Class I Facility. This
2 manifested waste contained Hazardous Substances that Cal Nev Pipeline Co.,
3 GATX, GATX Terminals Corp., Southern Pacific Pipe Lines, Inc. and Tenneco Oil
4 Co. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
5 Defendant Kinder Morgan Energy Partners, L.P. has not incurred any costs at the
6 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
7 at the BKK Class I Facility.

8 295. According to historical BKK Corp. records, Defendant Knudsen Corp.
9 contributed manifested waste to the BKK Class I Facility. This manifested waste
10 contained Hazardous Substances that Defendant Knudsen Corp. generated and/or
11 arranged for its disposal at the BKK Class I Facility. To date, Defendant Knudsen
12 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
13 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

14 296. Upon information and belief, Defendant Konica Photo Service U.S.A.,
15 Inc. is the successor to Fotomat Labs Inc. and/or otherwise liable for manifested
16 waste that was contributed to the BKK Class I Facility by Fotomat Labs Inc.
17 According to historical BKK Corp. records, Fotomat Labs Inc. contributed
18 manifested waste to the BKK Class I Facility. This manifested waste contained
19 Hazardous Substances that Fotomat Labs Inc. generated and/or arranged for its
20 disposal at the BKK Class I Facility. To date, Defendant Konica Photo Service
21 U.S.A., Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its
22 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 297. Upon information and belief, Defendant Korbel Capital LLC is the
24 successor to Davis Investment Co. and/or otherwise liable for manifested waste that
25 was contributed to the BKK Class I Facility by Davis Investment Co. According to
26 historical BKK Corp. records, Davis Investment Co. contributed manifested waste
27 to the BKK Class I Facility. This manifested waste contained Hazardous
28 Substances that Davis Investment Co. generated and/or arranged for its disposal at

1 the BKK Class I Facility. To date, Defendant Korbel Capital LLC has not incurred
2 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
3 by the Plaintiffs at the BKK Class I Facility.

4 298. According to historical BKK Corp. records, Defendant Krazy Glue
5 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
6 waste contained Hazardous Substances that Defendant Krazy Glue Inc. generated
7 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
8 Krazy Glue Inc. has not incurred any costs at the BKK Class I Facility nor has it
9 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 299. Upon information and belief, Defendant L'Oreal USA, Inc. is the
11 successor to Redken Laboratories Inc. and/or otherwise liable for manifested waste
12 that was contributed to the BKK Class I Facility by Redken Laboratories Inc.
13 According to historical BKK Corp. records, Redken Laboratories Inc. contributed
14 manifested waste to the BKK Class I Facility. This manifested waste contained
15 Hazardous Substances that Redken Laboratories Inc. generated and/or arranged for
16 its disposal at the BKK Class I Facility. To date, Defendant L'Oreal USA, Inc. has
17 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
18 costs incurred by the Plaintiffs at the BKK Class I Facility.

19 300. Upon information and belief, Defendant Lanxess Corporation is the
20 successor to Purex Corp. and/or otherwise liable for manifested waste that was
21 contributed to the BKK Class I Facility by Purex Corp. According to historical
22 BKK Corp. records, Purex Corp. contributed manifested waste to the BKK Class I
23 Facility. This manifested waste contained Hazardous Substances that Purex Corp.
24 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
25 Defendant Lanxess Corporation has not incurred any costs at the BKK Class I
26 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
27 Class I Facility.

28 301. According to historical BKK Corp. records, Defendant Liquid Waste

1 Management contributed manifested waste to the BKK Class I Facility. This
2 manifested waste contained Hazardous Substances that Defendant Liquid Waste
3 Management generated and/or arranged for its disposal at the BKK Class I Facility.
4 To date, Defendant Liquid Waste Management has not incurred any costs at the
5 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
6 at the BKK Class I Facility.

7 302. Upon information and belief, Defendant Lisi Aerospace North
8 America, Inc. is the successor to Mercury Aerospace Fasteners and/or otherwise
9 liable for manifested waste that was contributed to the BKK Class I Facility by
10 Mercury Aerospace Fasteners. According to historical BKK Corp. records,
11 Mercury Aerospace Fasteners contributed manifested waste to the BKK Class I
12 Facility. This manifested waste contained Hazardous Substances that Mercury
13 Aerospace Fasteners generated and/or arranged for its disposal at the BKK Class I
14 Facility. To date, Defendant Lisi Aerospace North America, Inc. has not incurred
15 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
16 by the Plaintiffs at the BKK Class I Facility.

17 303. According to historical BKK Corp. records, Defendant Long Beach
18 Fabricators Inc. contributed manifested waste to the BKK Class I Facility. This
19 manifested waste contained Hazardous Substances that Defendant Long Beach
20 Fabricators Inc. generated and/or arranged for its disposal at the BKK Class I
21 Facility. To date, Defendant Long Beach Fabricators Inc. has not incurred any costs
22 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
23 Plaintiffs at the BKK Class I Facility.

24 304. According to historical BKK Corp. records, Defendant Lonza Inc.
25 contributed manifested waste to the BKK Class I Facility. This manifested waste
26 contained Hazardous Substances that Defendant Lonza Inc. generated and/or
27 arranged for its disposal at the BKK Class I Facility. To date, Defendant Lonza Inc.
28 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share

1 of costs incurred by the Plaintiffs at the BKK Class I Facility.

2 305. Upon information and belief, Defendant Lonza Inc. is the successor to
3 Cyclo Chemical Co., Balenco Enterprises and/or Pacific Anchor Chemical Corp.
4 and/or otherwise liable for manifested waste that was contributed to the BKK Class
5 I Facility by Cyclo Chemical Co., Balenco Enterprises and/or Pacific Anchor
6 Chemical Corp. According to historical BKK Corp. records, Cyclo Chemical Co.,
7 Balenco Enterprises and Pacific Anchor Chemical Corp. contributed manifested
8 waste to the BKK Class I Facility. This manifested waste contained Hazardous
9 Substances that Cyclo Chemical Co., Balenco Enterprises and Pacific Anchor
10 Chemical Corp. generated and/or arranged for its disposal at the BKK Class I
11 Facility. To date, Defendant Lonza Inc. has not incurred any costs at the BKK Class
12 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
13 Class I Facility.

14 306. Upon information and belief, Defendant Loral Space &
15 Communications Inc. is the successor to Ford Aerospace and Communications
16 Corp. and/or otherwise liable for manifested waste that was contributed to the BKK
17 Class I Facility by Ford Aerospace and Communications Corp. According to
18 historical BKK Corp. records, Ford Aerospace and Communications Corp.
19 contributed manifested waste to the BKK Class I Facility. This manifested waste
20 contained Hazardous Substances that Ford Aerospace and Communications Corp.
21 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
22 Defendant Loral Space & Communications Inc. has not incurred any costs at the
23 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
24 at the BKK Class I Facility.

25 307. According to historical BKK Corp. records, Defendant Los Angeles
26 Gauge Co. contributed manifested waste to the BKK Class I Facility. This
27 manifested waste contained Hazardous Substances that Defendant Los Angeles
28 Gauge Co. generated and/or arranged for its disposal at the BKK Class I Facility.

1 To date, Defendant Los Angeles Gauge Co. has not incurred any costs at the BKK
2 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
3 BKK Class I Facility.

4 308. According to historical BKK Corp. records, Defendant Los Angeles
5 Plating Co. contributed manifested waste to the BKK Class I Facility. This
6 manifested waste contained Hazardous Substances that Defendant Los Angeles
7 Plating Co. generated and/or arranged for its disposal at the BKK Class I Facility.
8 To date, Defendant Los Angeles Plating Co. has not incurred any costs at the BKK
9 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
10 BKK Class I Facility.

11 309. According to historical BKK Corp. records, Defendant Lucky Stores
12 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
13 waste contained Hazardous Substances that Defendant Lucky Stores Inc. generated
14 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
15 Lucky Stores Inc. has not incurred any costs at the BKK Class I Facility nor has it
16 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

17 310. According to historical BKK Corp. records, Defendant Lumidor
18 Manufacturing Co. contributed manifested waste to the BKK Class I Facility. This
19 manifested waste contained Hazardous Substances that Defendant Lumidor
20 Manufacturing Co. generated and/or arranged for its disposal at the BKK Class I
21 Facility. To date, Defendant Lumidor Manufacturing Co. has not incurred any costs
22 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
23 Plaintiffs at the BKK Class I Facility.

24 311. Upon information and belief, Defendant M-I L.L.C *aka* and/or *dba* M-
25 I Swaco is the successor to Imco Services and/or otherwise liable for manifested
26 waste that was contributed to the BKK Class I Facility by Imco Services.
27 According to historical BKK Corp. records, Imco Services contributed manifested
28 waste to the BKK Class I Facility. This manifested waste contained Hazardous

1 Substances that Imco Services generated and/or arranged for its disposal at the
2 BKK Class I Facility. To date, Defendant M-I L.L.C *aka* and/or *dba* M-I Swaco has
3 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
4 costs incurred by the Plaintiffs at the BKK Class I Facility.

5 312. According to historical BKK Corp. records, Defendant Macdermid
6 Printing Solutions contributed manifested waste to the BKK Class I Facility. This
7 manifested waste contained Hazardous Substances that Defendant Macdermid
8 Printing Solutions generated and/or arranged for its disposal at the BKK Class I
9 Facility. To date, Defendant Macdermid Printing Solutions has not incurred any
10 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
11 the Plaintiffs at the BKK Class I Facility.

12 313. According to historical BKK Corp. records, Defendant Mack Trucks
13 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
14 waste contained Hazardous Substances that Defendant Mack Trucks Inc. generated
15 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
16 Mack Trucks Inc. has not incurred any costs at the BKK Class I Facility nor has it
17 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

18 314. Upon information and belief, Defendant Maersk Line, Limited (MLL)
19 is the successor to Sea Land Service Inc. and/or otherwise liable for manifested
20 waste that was contributed to the BKK Class I Facility by Sea Land Service Inc.
21 According to historical BKK Corp. records, Sea Land Service Inc. contributed
22 manifested waste to the BKK Class I Facility. This manifested waste contained
23 Hazardous Substances that Sea Land Service Inc. generated and/or arranged for its
24 disposal at the BKK Class I Facility. To date, Defendant Maersk Line, Limited
25 (MLL) has not incurred any costs at the BKK Class I Facility nor has it paid its fair
26 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 315. According to historical BKK Corp. records, Defendant Marco
28 Chemical Co. contributed manifested waste to the BKK Class I Facility. This

1 manifested waste contained Hazardous Substances that Defendant Marco Chemical
2 Co. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
3 Defendant Marco Chemical Co. has not incurred any costs at the BKK Class I
4 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
5 Class I Facility.

6 316. According to historical BKK Corp. records, Defendant Marten
7 Management Co. contributed manifested waste to the BKK Class I Facility. This
8 manifested waste contained Hazardous Substances that Defendant Marten
9 Management Co. generated and/or arranged for its disposal at the BKK Class I
10 Facility. To date, Defendant Marten Management Co. has not incurred any costs at
11 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
12 Plaintiffs at the BKK Class I Facility.

13 317. According to historical BKK Corp. records, Defendant Maxwell
14 Laboratories Inc. contributed manifested waste to the BKK Class I Facility. This
15 manifested waste contained Hazardous Substances that Defendant Maxwell
16 Laboratories Inc. generated and/or arranged for its disposal at the BKK Class I
17 Facility. To date, Defendant Maxwell Laboratories Inc. has not incurred any costs
18 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
19 Plaintiffs at the BKK Class I Facility.

20 318. Upon information and belief, Defendant Mazda Motor of America,
21 Inc. is the successor to Mazda North America and/or otherwise liable for
22 manifested waste that was contributed to the BKK Class I Facility by Mazda North
23 America. According to historical BKK Corp. records, Mazda North America
24 contributed manifested waste to the BKK Class I Facility. This manifested waste
25 contained Hazardous Substances that Mazda North America generated and/or
26 arranged for its disposal at the BKK Class I Facility. To date, Defendant Mazda
27 Motor of America, Inc. has not incurred any costs at the BKK Class I Facility nor
28 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I

1 Facility.

2 319. According to historical BKK Corp. records, Defendant Mazda North
3 America contributed manifested waste to the BKK Class I Facility. This
4 manifested waste contained Hazardous Substances that Defendant Mazda North
5 America generated and/or arranged for its disposal at the BKK Class I Facility. To
6 date, Defendant Mazda North America has not incurred any costs at the BKK Class
7 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
8 Class I Facility.

9 320. According to historical BKK Corp. records, Defendant MCA
10 Laboratories contributed manifested waste to the BKK Class I Facility. This
11 manifested waste contained Hazardous Substances that Defendant MCA
12 Laboratories generated and/or arranged for its disposal at the BKK Class I Facility.
13 To date, Defendant MCA Laboratories has not incurred any costs at the BKK Class
14 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
15 Class I Facility.

16 321. According to historical BKK Corp. records, Defendant McKay
17 Chemical Co. contributed manifested waste to the BKK Class I Facility. This
18 manifested waste contained Hazardous Substances that Defendant McKay
19 Chemical Co. generated and/or arranged for its disposal at the BKK Class I
20 Facility. To date, Defendant McKay Chemical Co. has not incurred any costs at the
21 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
22 at the BKK Class I Facility.

23 322. Upon information and belief, Defendant Mead Johnson & Company is
24 the successor to Drackett Co. and/or otherwise liable for manifested waste that was
25 contributed to the BKK Class I Facility by Drackett Co. According to historical
26 BKK Corp. records, Drackett Co. contributed manifested waste to the BKK Class I
27 Facility. This manifested waste contained Hazardous Substances that Drackett Co.
28 generated and/or arranged for its disposal at the BKK Class I Facility. To date,

1 Defendant Mead Johnson & Company has not incurred any costs at the BKK Class
2 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
3 Class I Facility.

4 323. Upon information and belief, Defendant Mercury Aerospace Inc. is the
5 successor to Mercury Aerospace Fasteners and/or otherwise liable for manifested
6 waste that was contributed to the BKK Class I Facility by Mercury Aerospace
7 Fasteners. According to historical BKK Corp. records, Mercury Aerospace
8 Fasteners contributed manifested waste to the BKK Class I Facility. This
9 manifested waste contained Hazardous Substances that Mercury Aerospace
10 Fasteners generated and/or arranged for its disposal at the BKK Class I Facility. To
11 date, Defendant Mercury Aerospace Inc. has not incurred any costs at the BKK
12 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
13 BKK Class I Facility.

14 324. According to historical BKK Corp. records, Defendant Mercury
15 Aerospace Fasteners contributed manifested waste to the BKK Class I Facility.
16 This manifested waste contained Hazardous Substances that Defendant Mercury
17 Aerospace Fasteners generated and/or arranged for its disposal at the BKK Class I
18 Facility. To date, Defendant Mercury Aerospace Fasteners has not incurred any
19 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
20 the Plaintiffs at the BKK Class I Facility.

21 325. According to historical BKK Corp. records, Defendant Merel Co. Inc.
22 contributed manifested waste to the BKK Class I Facility. This manifested waste
23 contained Hazardous Substances that Defendant Merel Co. Inc. generated and/or
24 arranged for its disposal at the BKK Class I Facility. To date, Defendant Merel Co.
25 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
26 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 326. According to historical BKK Corp. records, Defendant Metal Box Can
28 contributed manifested waste to the BKK Class I Facility. This manifested waste

1 contained Hazardous Substances that Defendant Metal Box Can generated and/or
2 arranged for its disposal at the BKK Class I Facility. To date, Defendant Metal
3 Box Can has not incurred any costs at the BKK Class I Facility nor has it paid its
4 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

5 327. According to historical BKK Corp. records, Defendant MGF
6 Industries contributed manifested waste to the BKK Class I Facility. This
7 manifested waste contained Hazardous Substances that Defendant MGF Industries
8 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
9 Defendant MGF Industries has not incurred any costs at the BKK Class I Facility
10 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
11 Facility.

12 328. Upon information and belief, Defendant Mr. Gasket Company is the
13 successor to Cragar Industries and/or Peat Manufacturing Co. and/or otherwise
14 liable for manifested waste that was contributed to the BKK Class I Facility by
15 Cragar Industries and/or Peat Manufacturing Co. According to historical BKK
16 Corp. records, Cragar Industries and/or Peat Manufacturing Co. contributed
17 manifested waste to the BKK Class I Facility. This manifested waste contained
18 Hazardous Substances that Cragar Industries and/or Peat Manufacturing Co.
19 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
20 Defendant Mr. Gasket Company has not incurred any costs at the BKK Class I
21 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
22 Class I Facility.

23 329. Upon information and belief, Defendant MRC Holdings, Inc. is the
24 successor to American Can Company and/or otherwise liable for manifested waste
25 that was contributed to the BKK Class I Facility by American Can Company.
26 According to historical BKK Corp. records, American Can Company contributed
27 manifested waste to the BKK Class I Facility. This manifested waste contained
28 Hazardous Substances that American Can Company generated and/or arranged for

1 its disposal at the BKK Class I Facility. To date, Defendant MRC Holdings, Inc.
2 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
3 of costs incurred by the Plaintiffs at the BKK Class I Facility.

4 330. Upon information and belief, Defendant Narco Chemical is the
5 successor to Narco Corporation and/or otherwise liable for manifested waste that
6 was contributed to the BKK Class I Facility by Narco Corporation. According to
7 historical BKK Corp. records, Narco Corporation contributed manifested waste to
8 the BKK Class I Facility. This manifested waste contained Hazardous Substances
9 that Narco Corporation generated and/or arranged for its disposal at the BKK Class
10 I Facility. To date, Defendant Narco Chemical has not incurred any costs at the
11 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
12 at the BKK Class I Facility.

13 331. According to historical BKK Corp. records, Defendant Narco
14 Corporation contributed manifested waste to the BKK Class I Facility. This
15 manifested waste contained Hazardous Substances that Defendant Narco
16 Corporation generated and/or arranged for its disposal at the BKK Class I Facility.
17 To date, Defendant Narco Corporation has not incurred any costs at the BKK Class
18 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
19 Class I Facility.

20 332. According to historical BKK Corp. records, Defendant Narmco
21 Materials Inc. contributed manifested waste to the BKK Class I Facility. This
22 manifested waste contained Hazardous Substances that Defendant Narmco
23 Materials Inc. generated and/or arranged for its disposal at the BKK Class I
24 Facility. To date, Defendant Narmco Materials Inc. has not incurred any costs at the
25 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
26 at the BKK Class I Facility.

27 333. Upon information and belief, Defendant National Oilwell Varco is the
28 successor to AMF Tuboscope Inc. and/or Varco International and/or otherwise

1 liable for manifested waste that was contributed to the BKK Class I Facility by
2 AMF Tuboscope Inc. and/or Varco International. According to historical BKK
3 Corp. records, AMF Tuboscope Inc. and Varco International contributed manifested
4 waste to the BKK Class I Facility. This manifested waste contained Hazardous
5 Substances that AMF Tuboscope Inc. and Varco International generated and/or
6 arranged for its disposal at the BKK Class I Facility. To date, Defendant National
7 Oilwell Varco has not incurred any costs at the BKK Class I Facility nor has it paid
8 its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

9 334. Upon information and belief, Defendant NavCom Defense Electronics,
10 Inc. is the successor to Hoffman Electronics and/or otherwise liable for manifested
11 waste that was contributed to the BKK Class I Facility by Hoffman Electronics.
12 According to historical BKK Corp. records, Hoffman Electronics contributed
13 manifested waste to the BKK Class I Facility. This manifested waste contained
14 Hazardous Substances that Hoffman Electronics generated and/or arranged for its
15 disposal at the BKK Class I Facility. To date, Defendant NavCom Defense
16 Electronics, Inc. has not incurred any costs at the BKK Class I Facility nor has it
17 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

18 335. Upon information and belief, Defendant Newell Brands Inc. is the
19 successor to Krazy Glue Inc. and/or otherwise liable for manifested waste that was
20 contributed to the BKK Class I Facility by Krazy Glue Inc. According to historical
21 BKK Corp. records, Krazy Glue Inc. contributed manifested waste to the BKK
22 Class I Facility. This manifested waste contained Hazardous Substances that Krazy
23 Glue Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To
24 date, Defendant Newell Brands Inc. has not incurred any costs at the BKK Class I
25 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
26 Class I Facility.

27 336. According to historical BKK Corp. records, Defendant New Fashion
28 Cleaners contributed manifested waste to the BKK Class I Facility. This manifested

1 waste contained Hazardous Substances that Defendant New Fashion Cleaners
2 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
3 Defendant New Fashion Cleaners has not incurred any costs at the BKK Class I
4 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
5 Class I Facility.

6 337. According to historical BKK Corp. records, Defendant Nippondenso
7 of Los Angeles contributed manifested waste to the BKK Class I Facility. This
8 manifested waste contained Hazardous Substances that Defendant Nippondenso of
9 Los Angeles generated and/or arranged for its disposal at the BKK Class I Facility.
10 To date, Defendant Nippondenso of Los Angeles has not incurred any costs at the
11 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
12 at the BKK Class I Facility.

13 338. According to historical BKK Corp. records, Defendant North
14 American Car Corp. contributed manifested waste to the BKK Class I Facility.
15 This manifested waste contained Hazardous Substances that Defendant North
16 American Car Corp. generated and/or arranged for its disposal at the BKK Class I
17 Facility. To date, Defendant North American Car Corp. has not incurred any costs
18 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
19 Plaintiffs at the BKK Class I Facility.

20 339. According to historical BKK Corp. records, Defendant North
21 American Environmental contributed manifested waste to the BKK Class I Facility.
22 This manifested waste contained Hazardous Substances that Defendant North
23 American Environmental generated and/or arranged for its disposal at the BKK
24 Class I Facility. To date, Defendant North American Environmental has not
25 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
26 incurred by the Plaintiffs at the BKK Class I Facility.

27 340. According to historical BKK Corp. records, Defendant Northrop
28 Pacific contributed manifested waste to the BKK Class I Facility. This manifested

1 waste contained Hazardous Substances that Defendant Northrop Pacific generated
2 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
3 Northrop Pacific has not incurred any costs at the BKK Class I Facility nor has it
4 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

5 341. Upon information and belief, Defendant Norwest Equity Partners is
6 the successor to Douglas Furniture of California and/or otherwise liable for
7 manifested waste that was contributed to the BKK Class I Facility by Douglas
8 Furniture of California. According to historical BKK Corp. records, Douglas
9 Furniture of California contributed manifested waste to the BKK Class I Facility.
10 This manifested waste contained Hazardous Substances that Douglas Furniture of
11 California generated and/or arranged for its disposal at the BKK Class I Facility. To
12 date, Defendant Norwest Equity Partners has not incurred any costs at the BKK
13 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
14 BKK Class I Facility.

15 342. Upon information and belief, Defendant Novartis Corp. is the
16 successor to Panel Air Corp. and/or otherwise liable for manifested waste that was
17 contributed to the BKK Class I Facility by Panel Air Corp. According to historical
18 BKK Corp. records, Panel Air Corp. contributed manifested waste to the BKK
19 Class I Facility. This manifested waste contained Hazardous Substances that Panel
20 Air Corp. generated and/or arranged for its disposal at the BKK Class I Facility. To
21 date, Defendant Novartis Corp. has not incurred any response costs at the BKK
22 Class I Facility nor has it paid its fair share of response costs incurred by the
23 Plaintiffs at the BKK Class I Facility.

24 343. According to historical BKK Corp. records, Defendant Old Quaker
25 Paint Co. contributed manifested waste to the BKK Class I Facility. This
26 manifested waste contained Hazardous Substances that Defendant Old Quaker Paint
27 Co. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
28 Defendant Old Quaker Paint Co. has not incurred any costs at the BKK Class I

1 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
2 Class I Facility.

3 344. According to historical BKK Corp. records, Defendant Orange County
4 Sanitation District contributed manifested waste to the BKK Class I Facility. This
5 manifested waste contained Hazardous Substances that Defendant Orange County
6 Sanitation District generated and/or arranged for its disposal at the BKK Class I
7 Facility. To date, Defendant Orange County Sanitation District has not incurred any
8 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
9 the Plaintiffs at the BKK Class I Facility.

10 345. Upon information and belief, Defendant Oryx Energy Company is the
11 successor to Sun Exploration and/or otherwise liable for manifested waste that was
12 contributed to the BKK Class I Facility by Sun Exploration. According to historical
13 BKK Corp. records, Sun Exploration contributed manifested waste to the BKK
14 Class I Facility. This manifested waste contained Hazardous Substances that Sun
15 Exploration generated and/or arranged for its disposal at the BKK Class I Facility.
16 To date, Defendant Oryx Energy Company has not incurred any costs at the BKK
17 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
18 BKK Class I Facility.

19 346. According to historical BKK Corp. records, Defendant Pacific Anchor
20 Chemical Corp. contributed manifested waste to the BKK Class I Facility. This
21 manifested waste contained Hazardous Substances that Defendant Pacific Anchor
22 Chemical Corp. generated and/or arranged for its disposal at the BKK Class I
23 Facility. To date, Defendant Pacific Anchor Chemical Corp. has not incurred any
24 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
25 the Plaintiffs at the BKK Class I Facility.

26 347. According to historical BKK Corp. records, Defendant Pacific
27 Intermountain Express contributed manifested waste to the BKK Class I Facility.
28 This manifested waste contained Hazardous Substances that Defendant Pacific

1 Intermountain Express generated and/or arranged for its disposal at the BKK Class
2 I Facility. To date, Defendant Pacific Intermountain Express has not incurred any
3 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
4 the Plaintiffs at the BKK Class I Facility.

5 348. According to historical BKK Corp. records, Defendant Pacific
6 Southwest Airlines contributed manifested waste to the BKK Class I Facility. This
7 manifested waste contained Hazardous Substances that Defendant Pacific
8 Southwest Airlines generated and/or arranged for its disposal at the BKK Class I
9 Facility. To date, Defendant Pacific Southwest Airlines has not incurred any costs
10 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
11 Plaintiffs at the BKK Class I Facility.

12 349. According to historical BKK Corp. records, Defendant Packaging
13 Corp. of America contributed manifested waste to the BKK Class I Facility. This
14 manifested waste contained Hazardous Substances that Defendant Packaging Corp.
15 of America generated and/or arranged for its disposal at the BKK Class I Facility.
16 To date, Defendant Packaging Corp. of America has not incurred any costs at the
17 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
18 at the BKK Class I Facility.

19 350. According to historical BKK Corp. records, Defendant Pactiv LLC
20 and/or its predecessor A. & E. Plastics Co. contributed manifested waste to the
21 BKK Class I Facility. This manifested waste contained Hazardous Substances that
22 Defendant Pactiv LLC and/or its predecessor A. & E. Plastics Co. generated and/or
23 arranged for its disposal at the BKK Class I Facility. To date, Defendant Pactiv
24 LLC has not incurred any costs at the BKK Class I Facility nor has it paid its fair
25 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

26 351. According to historical BKK Corp. records, Defendant Paint &
27 Coatings Corp. contributed manifested waste to the BKK Class I Facility. This
28 manifested waste contained Hazardous Substances that Defendant Paint & Coatings

1 Corp. generated and/or arranged for its disposal at the BKK Class I Facility. To
2 date, Defendant Paint & Coatings Corp. has not incurred any costs at the BKK
3 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
4 BKK Class I Facility.

5 352. According to historical BKK Corp. records, Defendant Panel Air Corp.
6 contributed manifested waste to the BKK Class I Facility. This manifested waste
7 contained Hazardous Substances that Defendant Panel Air Corp. generated and/or
8 arranged for its disposal at the BKK Class I Facility. To date, Defendant Panel Air
9 Corp. has not incurred any response costs at the BKK Class I Facility nor has it
10 paid its fair share of response costs incurred by the Plaintiffs at the BKK Class I
11 Facility.

12 353. Upon information and belief, Defendant Parsons Corporation is the
13 successor to Ralph M. Parsons Co. and/or otherwise liable for manifested waste that
14 was contributed to the BKK Class I Facility by Ralph M. Parsons Co. According to
15 historical BKK Corp. records, Ralph M. Parsons Co. contributed manifested waste
16 to the BKK Class I Facility. This manifested waste contained Hazardous
17 Substances that Ralph M. Parsons Co. generated and/or arranged for its disposal at
18 the BKK Class I Facility. To date, Defendant Parsons Corporation has not incurred
19 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
20 by the Plaintiffs at the BKK Class I Facility.

21 354. According to historical BKK Corp. records, Defendant Pauley
22 Petroleum Co. contributed manifested waste to the BKK Class I Facility. This
23 manifested waste contained Hazardous Substances that Defendant Pauley
24 Petroleum Co. generated and/or arranged for its disposal at the BKK Class I
25 Facility. To date, Defendant Pauley Petroleum Co. has not incurred any costs at the
26 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
27 at the BKK Class I Facility.

28 355. Upon information and belief, Defendant PCC Rollmet, Inc. is the

1 successor to Kaiser Rollmet Inc. and/or otherwise liable for manifested waste that
2 was contributed to the BKK Class I Facility by Kaiser Rollmet Inc. According to
3 historical BKK Corp. records, Kaiser Rollmet Inc. contributed manifested waste to
4 the BKK Class I Facility. This manifested waste contained Hazardous Substances
5 that Kaiser Rollmet Inc. generated and/or arranged for its disposal at the BKK Class
6 I Facility. To date, Defendant PCC Rollmet, Inc. has not incurred any costs at the
7 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
8 at the BKK Class I Facility.

9 356. According to historical BKK Corp. records, Defendant Peairs
10 Engineers contributed manifested waste to the BKK Class I Facility. This
11 manifested waste contained Hazardous Substances that Defendant Peairs Engineers
12 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
13 Defendant Peairs Engineers has not incurred any costs at the BKK Class I Facility
14 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
15 Facility.

16 357. According to historical BKK Corp. records, Defendant Peat
17 Manufacturing Co. contributed manifested waste to the BKK Class I Facility. This
18 manifested waste contained Hazardous Substances that Defendant Peat
19 Manufacturing Co. generated and/or arranged for its disposal at the BKK Class I
20 Facility. To date, Defendant Peat Manufacturing Co. has not incurred any costs at
21 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
22 Plaintiffs at the BKK Class I Facility.

23 358. Upon information and belief, Defendant Penske Logistics Corp. is the
24 successor to Balser Trucking and/or otherwise liable for manifested waste that was
25 contributed to the BKK Class I Facility by Balser Trucking. According to historical
26 BKK Corp. records, Balser Trucking contributed manifested waste to the BKK
27 Class I Facility. This manifested waste contained Hazardous Substances that Balser
28 Trucking generated and/or arranged for its disposal at the BKK Class I Facility. To

1 date, Defendant Penske Logistics Corp. has not incurred any response costs at the
2 BKK Class I Facility nor has it paid its fair share of response costs incurred by the
3 Plaintiffs at the BKK Class I Facility.

4 359. Upon information and belief, Defendant Per-Olof Loof Family
5 Foundation, Inc. is the successor to Wells Marine Inc. and/or otherwise liable for
6 manifested waste that was contributed to the BKK Class I Facility by Wells Marine
7 Inc. According to historical BKK Corp. records, Wells Marine Inc. contributed
8 manifested waste to the BKK Class I Facility. This manifested waste contained
9 Hazardous Substances that Wells Marine Inc. generated and/or arranged for its
10 disposal at the BKK Class I Facility. To date, Defendant Per-Olof Loof Family
11 Foundation, Inc. has not incurred any costs at the BKK Class I Facility nor has it
12 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

13 360. Upon information and belief, Defendant Pervo International, Inc. is the
14 successor to Pervo Paint Company and/or otherwise liable for manifested waste that
15 was contributed to the BKK Class I Facility by Pervo Paint Company. According
16 to historical BKK Corp. records, Pervo Paint Company contributed manifested
17 waste to the BKK Class I Facility. This manifested waste contained Hazardous
18 Substances that Pervo Paint Company generated and/or arranged for its disposal at
19 the BKK Class I Facility. To date, Defendant Pervo International, Inc. has not
20 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
21 incurred by the Plaintiffs at the BKK Class I Facility.

22 361. According to historical BKK Corp. records, Defendant Pervo Paint
23 Company contributed manifested waste to the BKK Class I Facility. This
24 manifested waste contained Hazardous Substances that Defendant Pervo Paint
25 Company generated and/or arranged for its disposal at the BKK Class I Facility. To
26 date, Defendant Pervo Paint Company has not incurred any costs at the BKK Class
27 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
28 Class I Facility.

1 362. According to historical BKK Corp. records, Defendant PGP Industries
2 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
3 waste contained Hazardous Substances that Defendant PGP Industries Inc.
4 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
5 Defendant PGP Industries Inc. has not incurred any costs at the BKK Class I
6 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
7 Class I Facility.

8 363. According to historical BKK Corp. records, Defendant Pillsbury Co.
9 contributed manifested waste to the BKK Class I Facility. This manifested waste
10 contained Hazardous Substances that Defendant Pillsbury Co. generated and/or
11 arranged for its disposal at the BKK Class I Facility. To date, Defendant Pillsbury
12 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
13 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

14 364. Upon information and belief, Defendant PRC–DeSoto International
15 Inc. is the successor to International Polymer Corp. and/or Products Research &
16 Chemical Corp. and/or otherwise liable for manifested waste that was contributed
17 to the BKK Class I Facility by International Polymer Corp. and/or Products
18 Research & Chemical Corp. According to historical BKK Corp. records,
19 International Polymer Corp. and Products Research & Chemical Corp. contributed
20 manifested waste to the BKK Class I Facility. This manifested waste contained
21 Hazardous Substances that International Polymer Corp. and Products Research &
22 Chemical Corp. generated and/or arranged for its disposal at the BKK Class I
23 Facility. To date, Defendant PRC–DeSoto International Inc. has not incurred any
24 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
25 the Plaintiffs at the BKK Class I Facility.

26 365. According to historical BKK Corp. records, Defendant Pre Delivery
27 Service contributed manifested waste to the BKK Class I Facility. This manifested
28 waste contained Hazardous Substances that Defendant Pre Delivery Service

1 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
2 Defendant Pre Delivery Service has not incurred any response costs at the BKK
3 Class I Facility nor has it paid its fair share of response costs incurred by the
4 Plaintiffs at the BKK Class I Facility.

5 366. Upon information and belief, Defendant Precision Castparts Corp. is
6 the successor to Reisner Metals and/or otherwise liable for manifested waste that
7 was contributed to the BKK Class I Facility by Reisner Metals. According to
8 historical BKK Corp. records, Reisner Metals contributed manifested waste to the
9 BKK Class I Facility. This manifested waste contained Hazardous Substances that
10 Reisner Metals generated and/or arranged for its disposal at the BKK Class I
11 Facility. To date, Defendant Precision Castparts Corp. has not incurred any costs at
12 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
13 Plaintiffs at the BKK Class I Facility.

14 367. According to historical BKK Corp. records, Defendant Price Pfister
15 *nka* Pfister contributed manifested waste to the BKK Class I Facility. This
16 manifested waste contained Hazardous Substances that Defendant Price Pfister *nka*
17 Pfister generated and/or arranged for its disposal at the BKK Class I Facility. To
18 date, Defendant Price Pfister *nka* Pfister has not incurred any costs at the BKK
19 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
20 BKK Class I Facility.

21 368. Upon information and belief, Defendant Printed Circuits, Inc. is the
22 successor to Electrotech Circuits Inc. and/or otherwise liable for manifested waste
23 that was contributed to the BKK Class I Facility by Electrotech Circuits Inc.
24 According to historical BKK Corp. records, Electrotech Circuits Inc. contributed
25 manifested waste to the BKK Class I Facility. This manifested waste contained
26 Hazardous Substances that Electrotech Circuits Inc. generated and/or arranged for
27 its disposal at the BKK Class I Facility. To date, Defendant Printed Circuits, Inc.
28 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share

1 of costs incurred by the Plaintiffs at the BKK Class I Facility.

2 369. According to historical BKK Corp. records, Defendant Products
3 Research & Chemical Corp. contributed manifested waste to the BKK Class I
4 Facility. This manifested waste contained Hazardous Substances that Defendant
5 Products Research & Chemical Corp. generated and/or arranged for its disposal at
6 the BKK Class I Facility. To date, Defendant Products Research & Chemical Corp.
7 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
8 of costs incurred by the Plaintiffs at the BKK Class I Facility.

9 370. According to historical BKK Corp. records, Defendant Proto Tool
10 contributed manifested waste to the BKK Class I Facility. This manifested waste
11 contained Hazardous Substances that Defendant Proto Tool generated and/or
12 arranged for its disposal at the BKK Class I Facility. To date, Defendant Proto Tool
13 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
14 of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 371. Upon information and belief, Defendant Pure Source LLC is the
16 successor to Cal Chem Cleaning Co. and/or otherwise liable for manifested waste
17 that was contributed to the BKK Class I Facility by Cal Chem Cleaning Co.
18 According to historical BKK Corp. records, Cal Chem Cleaning Co. contributed
19 manifested waste to the BKK Class I Facility. This manifested waste contained
20 Hazardous Substances that Cal Chem Cleaning Co. generated and/or arranged for
21 its disposal at the BKK Class I Facility. To date, Defendant Pure Source LLC has
22 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
23 costs incurred by the Plaintiffs at the BKK Class I Facility.

24 372. According to historical BKK Corp. records, Defendant Purex Corp.
25 contributed manifested waste to the BKK Class I Facility. This manifested waste
26 contained Hazardous Substances that Defendant Purex Corp. generated and/or
27 arranged for its disposal at the BKK Class I Facility. To date, Defendant Purex
28 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair

1 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

2 373. Upon information and belief, Defendant Purex Industries, Inc. is the
3 successor to T.P. Industrial Inc. and/or otherwise liable for manifested waste that
4 was contributed to the BKK Class I Facility by T.P. Industrial Inc. According to
5 historical BKK Corp. records, T.P. Industrial Inc. contributed manifested waste to
6 the BKK Class I Facility. This manifested waste contained Hazardous Substances
7 that T.P. Industrial Inc. generated and/or arranged for its disposal at the BKK Class
8 I Facility. To date, Defendant Purex Industries, Inc. has not incurred any costs at
9 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
10 Plaintiffs at the BKK Class I Facility.

11 374. According to historical BKK Corp. records, Defendant Ralph M.
12 Parsons Co. contributed manifested waste to the BKK Class I Facility. This
13 manifested waste contained Hazardous Substances that Defendant Ralph M.
14 Parsons Co. generated and/or arranged for its disposal at the BKK Class I Facility.
15 To date, Defendant Ralph M. Parsons Co. has not incurred any costs at the BKK
16 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
17 BKK Class I Facility.

18 375. According to historical BKK Corp. records, Defendant Redken
19 Laboratories Inc. contributed manifested waste to the BKK Class I Facility. This
20 manifested waste contained Hazardous Substances that Defendant Redken
21 Laboratories Inc. generated and/or arranged for its disposal at the BKK Class I
22 Facility. To date, Defendant Redken Laboratories Inc. has not incurred any costs at
23 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
24 Plaintiffs at the BKK Class I Facility.

25 376. According to historical BKK Corp. records, Defendant Register
26 Properties Inc. contributed manifested waste to the BKK Class I Facility. This
27 manifested waste contained Hazardous Substances that Defendant Register
28 Properties Inc. generated and/or arranged for its disposal at the BKK Class I

1 Facility. To date, Defendant Register Properties Inc. has not incurred any costs at
2 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
3 Plaintiffs at the BKK Class I Facility.

4 377. According to historical BKK Corp. records, Defendant Reisner Metals
5 contributed manifested waste to the BKK Class I Facility. This manifested waste
6 contained Hazardous Substances that Defendant Reisner Metals generated and/or
7 arranged for its disposal at the BKK Class I Facility. To date, Defendant Reisner
8 Metals has not incurred any costs at the BKK Class I Facility nor has it paid its fair
9 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 378. According to historical BKK Corp. records, Defendant Replacement
11 Parts Manufacturing contributed manifested waste to the BKK Class I Facility. This
12 manifested waste contained Hazardous Substances that Defendant Replacement
13 Parts Manufacturing generated and/or arranged for its disposal at the BKK Class I
14 Facility. To date, Defendant Replacement Parts Manufacturing has not incurred any
15 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
16 the Plaintiffs at the BKK Class I Facility.

17 379. According to historical BKK Corp. records, Defendant Rexam
18 Beverage Can Company contributed manifested waste to the BKK Class I Facility.
19 This manifested waste contained Hazardous Substances that Defendant Rexam
20 Beverage Can Company generated and/or arranged for its disposal at the BKK
21 Class I Facility. To date, Defendant Rexam Beverage Can Company has not
22 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
23 incurred by the Plaintiffs at the BKK Class I Facility.

24 380. According to historical BKK Corp. records, Defendant Ricoh
25 Electronics, Inc. contributed manifested waste to the BKK Class I Facility. This
26 manifested waste contained Hazardous Substances that Defendant Ricoh
27 Electronics, Inc. generated and/or arranged for its disposal at the BKK Class I
28 Facility. To date, Defendant Ricoh Electronics, Inc. has not incurred any costs at

1 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
2 Plaintiffs at the BKK Class I Facility.

3 381. Upon information and belief, Defendant Ricoh Printing Systems
4 America Inc. is the successor to Data Products Corp. and/or otherwise liable for
5 manifested waste that was contributed to the BKK Class I Facility by Data Products
6 Corp. According to historical BKK Corp. records, Data Products Corp. contributed
7 manifested waste to the BKK Class I Facility. This manifested waste contained
8 Hazardous Substances that Data Products Corp. generated and/or arranged for its
9 disposal at the BKK Class I Facility. To date, Defendant Ricoh Printing Systems
10 America Inc. has not incurred any response costs at the BKK Class I Facility nor
11 has it paid its fair share of response costs incurred by the Plaintiffs at the BKK
12 Class I Facility.

13 382. Upon information and belief, Defendant Rio Tinto Alcan Inc. is the
14 successor to American Can Company and/or U.S. Borax & Chemical Corp. and/or
15 otherwise liable for manifested waste that was contributed to the BKK Class I
16 Facility by American Can Company and/or U.S. Borax & Chemical Corp.
17 According to historical BKK Corp. records, American Can Company and U.S.
18 Borax & Chemical Corp. contributed manifested waste to the BKK Class I Facility.
19 This manifested waste contained Hazardous Substances that American Can
20 Company and U.S. Borax and Chemical Corp. generated and/or arranged for its
21 disposal at the BKK Class I Facility. To date, Defendant Rio Tinto Alcan Inc. has
22 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
23 costs incurred by the Plaintiffs at the BKK Class I Facility.

24 383. According to historical BKK Corp. records, Defendant Roberts
25 Manufacturing Co. contributed manifested waste to the BKK Class I Facility. This
26 manifested waste contained Hazardous Substances that Defendant Roberts
27 Manufacturing Co. generated and/or arranged for its disposal at the BKK Class I
28 Facility. To date, Defendant Roberts Manufacturing Co. has not incurred any costs

1 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
2 Plaintiffs at the BKK Class I Facility.

3 384. Upon information and belief, Defendant Roller Bearing Company of
4 America, Inc. is the successor to Sargent Industries and/or otherwise liable for
5 manifested waste that was contributed to the BKK Class I Facility by Sargent
6 Industries. According to historical BKK Corp. records, Sargent Industries
7 contributed manifested waste to the BKK Class I Facility. This manifested waste
8 contained Hazardous Substances that Sargent Industries generated and/or arranged
9 for its disposal at the BKK Class I Facility. To date, Defendant Roller Bearing
10 Company of America, Inc. has not incurred any costs at the BKK Class I Facility
11 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
12 Facility.

13 385. According to historical BKK Corp. records, Defendant Royal
14 Aluminum Co. contributed manifested waste to the BKK Class I Facility. This
15 manifested waste contained Hazardous Substances that Defendant Royal Aluminum
16 Co. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
17 Defendant Royal Aluminum Co. has not incurred any costs at the BKK Class I
18 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
19 Class I Facility.

20 386. Upon information and belief, Defendant Ryder System, Inc. is the
21 successor to Pacific Intermountain Express and/or otherwise liable for manifested
22 waste that was contributed to the BKK Class I Facility by Pacific Intermountain
23 Express. According to historical BKK Corp. records, Pacific Intermountain
24 Express contributed manifested waste to the BKK Class I Facility. This manifested
25 waste contained Hazardous Substances that Pacific Intermountain Express
26 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
27 Defendant Ryder System, Inc. has not incurred any costs at the BKK Class I
28 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK

1 Class I Facility.

2 387. Upon information and belief, Defendant S.C. Johnson & Son, Inc. is
3 the successor to Drackett Co. and/or otherwise liable for manifested waste that was
4 contributed to the BKK Class I Facility by Drackett Co. According to historical
5 BKK Corp. records, Drackett Co. contributed manifested waste to the BKK Class I
6 Facility. This manifested waste contained Hazardous Substances that Drackett Co.
7 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
8 Defendant S.C. Johnson & Son, Inc. has not incurred any costs at the BKK Class I
9 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
10 Class I Facility.

11 388. According to historical BKK Corp. records, Defendant San Diego Pipe
12 Line Co. contributed manifested waste to the BKK Class I Facility. This manifested
13 waste contained Hazardous Substances that Defendant San Diego Pipe Line Co.
14 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
15 Defendant San Diego Pipe Line Co. has not incurred any costs at the BKK Class I
16 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
17 Class I Facility.

18 389. According to historical BKK Corp. records, Defendant Safeway Stores
19 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
20 waste contained Hazardous Substances that Defendant Safeway Stores Inc.
21 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
22 Defendant Safeway Stores Inc. has not incurred any costs at the BKK Class I
23 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
24 Class I Facility.

25 390. According to historical BKK Corp. records, Defendant San Fernando
26 Laboratories contributed manifested waste to the BKK Class I Facility. This
27 manifested waste contained Hazardous Substances that Defendant San Fernando
28 Laboratories generated and/or arranged for its disposal at the BKK Class I Facility.

1 To date, Defendant San Fernando Laboratories has not incurred any response costs
2 at the BKK Class I Facility nor has it paid its fair share of response costs incurred
3 by the Plaintiffs at the BKK Class I Facility.

4 391. According to historical BKK Corp. records, Defendant Sandia Metal
5 Process, Inc. contributed manifested waste to the BKK Class I Facility. This
6 manifested waste contained Hazardous Substances that Defendant Sandia Metal
7 Process, Inc. generated and/or arranged for its disposal at the BKK Class I Facility.
8 To date, Defendant Sandia Metal Process, Inc. has not incurred any costs at the
9 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
10 at the BKK Class I Facility.

11 392. According to historical BKK Corp. records, Defendant Sargent
12 Fletcher Inc. contributed manifested waste to the BKK Class I Facility. This
13 manifested waste contained Hazardous Substances that Defendant Sargent Fletcher
14 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
15 Defendant Sargent Fletcher Inc. has not incurred any costs at the BKK Class I
16 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
17 Class I Facility.

18 393. According to historical BKK Corp. records, Defendant Sargent
19 Industries contributed manifested waste to the BKK Class I Facility. This
20 manifested waste contained Hazardous Substances that Defendant Sargent
21 Industries generated and/or arranged for its disposal at the BKK Class I Facility. To
22 date, Defendant Sargent Industries has not incurred any costs at the BKK Class I
23 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
24 Class I Facility.

25 394. Upon information and belief, Defendant Schlumberger, Ltd. is the
26 successor to I.T. Corp., and/or Joy Petroleum Equipment and/or otherwise liable for
27 manifested waste that was contributed to the BKK Class I Facility by I.T. Corp.
28 and/or Joy Petroleum Equipment. According to historical BKK Corp. records, I.T.

1 Corp. and Joy Petroleum Equipment contributed manifested waste to the BKK
2 Class I Facility. This manifested waste contained Hazardous Substances that I.T.
3 Corp. and Joy Petroleum Equipment generated and/or arranged for its disposal at
4 the BKK Class I Facility. To date, Defendant Schlumberger, Ltd. has not incurred
5 any costs at the BKK Class I Facility nor has it paid its fair share of costs incurred
6 by the Plaintiffs at the BKK Class I Facility.

7 395. Upon information and belief, Defendant Schlumberger N.V. is the
8 successor to Xtra Energy and/or otherwise liable for manifested waste that was
9 contributed to the BKK Class I Facility by Xtra Energy. According to historical
10 BKK Corp. records, Xtra Energy contributed manifested waste to the BKK Class I
11 Facility. This manifested waste contained Hazardous Substances that Xtra Energy
12 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
13 Defendant Schlumberger N.V. has not incurred any costs at the BKK Class I
14 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
15 Class I Facility.

16 396. According to historical BKK Corp. records, Defendant Sea Land
17 Service Inc. contributed manifested waste to the BKK Class I Facility. This
18 manifested waste contained Hazardous Substances that Defendant Sea Land Service
19 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
20 Defendant Sea Land Service Inc. has not incurred any costs at the BKK Class I
21 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
22 Class I Facility.

23 397. According to historical BKK Corp. records, Defendant Service
24 Chemical Co. contributed manifested waste to the BKK Class I Facility. This
25 manifested waste contained Hazardous Substances that Defendant Service
26 Chemical Co. generated and/or arranged for its disposal at the BKK Class I
27 Facility. To date, Defendant Service Chemical Co. has not incurred any costs at the
28 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs

1 at the BKK Class I Facility.

2 398. According to historical BKK Corp. records, Defendant Shuwa
3 Investments Corp. contributed manifested waste to the BKK Class I Facility. This
4 manifested waste contained Hazardous Substances that Defendant Shuwa
5 Investments Corp. generated and/or arranged for its disposal at the BKK Class I
6 Facility. To date, Defendant Shuwa Investments Corp. has not incurred any costs at
7 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
8 Plaintiffs at the BKK Class I Facility.

9 399. According to historical BKK Corp. records, Defendant Smith & Co.
10 contributed manifested waste to the BKK Class I Facility. This manifested waste
11 contained Hazardous Substances that Defendant Smith & Co. generated and/or
12 arranged for its disposal at the BKK Class I Facility. To date, Defendant Smith &
13 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
14 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

15 400. Upon information and belief, Defendant Somacis Inc. is the successor
16 to Hallmark Circuits Inc. and/or otherwise liable for manifested waste that was
17 contributed to the BKK Class I Facility by Hallmark Circuits Inc. According to
18 historical BKK Corp. records, Hallmark Circuits Inc. contributed manifested waste
19 to the BKK Class I Facility. This manifested waste contained Hazardous
20 Substances that Hallmark Circuits Inc. generated and/or arranged for its disposal at
21 the BKK Class I Facility. To date, Defendant Somacis Inc. has not incurred any
22 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
23 the Plaintiffs at the BKK Class I Facility.

24 401. Upon information and belief, Defendant Sony Pictures Entertainment
25 Inc. is the successor to Columbia Pictures and/or otherwise liable for manifested
26 waste that was contributed to the BKK Class I Facility by Columbia Pictures.
27 According to historical BKK Corp. records, Columbia Pictures contributed
28 manifested waste to the BKK Class I Facility. This manifested waste contained

1 Hazardous Substances that Columbia Pictures generated and/or arranged for its
2 disposal at the BKK Class I Facility. To date, Defendant Sony Pictures
3 Entertainment Inc. has not incurred any costs at the BKK Class I Facility nor has it
4 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

5 402. According to historical BKK Corp. records, Defendant South West
6 Forest Products contributed manifested waste to the BKK Class I Facility. This
7 manifested waste contained Hazardous Substances that Defendant South West
8 Forest Products generated and/or arranged for its disposal at the BKK Class I
9 Facility. To date, Defendant South West Forest Products has not incurred any costs
10 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
11 Plaintiffs at the BKK Class I Facility.

12 403. According to historical BKK Corp. records, Defendant Southern
13 California Chemical (*aka* Southern California Chemicals) contributed manifested
14 waste to the BKK Class I Facility. This manifested waste contained Hazardous
15 Substances that Defendant Southern California Chemical generated and/or arranged
16 for its disposal at the BKK Class I Facility. To date, Defendant Southern California
17 Chemical has not incurred any costs at the BKK Class I Facility nor has it paid its
18 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

19 404. According to historical BKK Corp. records, Defendant Southern
20 Pacific Pipe Lines, Inc. contributed manifested waste to the BKK Class I Facility.
21 This manifested waste contained Hazardous Substances that Defendant Southern
22 Pacific Pipe Lines, Inc. generated and/or arranged for its disposal at the BKK Class
23 I Facility. To date, Defendant Southern Pacific Pipe Lines, Inc. has not incurred any
24 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
25 the Plaintiffs at the BKK Class I Facility.

26 405. According to historical BKK Corp. records, Defendant Southwest
27 Steel Rolling Mills contributed manifested waste to the BKK Class I Facility. This
28 manifested waste contained Hazardous Substances that Defendant Southwest Steel

1 Rolling Mills generated and/or arranged for its disposal at the BKK Class I Facility.
2 To date, Defendant Southwest Steel Rolling Mills has not incurred any costs at the
3 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
4 at the BKK Class I Facility.

5 406. According to historical BKK Corp. records, Defendant Southwestern
6 Engineering contributed manifested waste to the BKK Class I Facility. This
7 manifested waste contained Hazardous Substances that Defendant Southwestern
8 Engineering generated and/or arranged for its disposal at the BKK Class I Facility.
9 To date, Defendant Southwestern Engineering has not incurred any costs at the
10 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
11 at the BKK Class I Facility.

12 407. According to historical BKK Corp. records, Defendant Standard
13 Industrial Towel & Uniform contributed manifested waste to the BKK Class I
14 Facility. This manifested waste contained Hazardous Substances that Defendant
15 Standard Industrial Towel & Uniform generated and/or arranged for its disposal at
16 the BKK Class I Facility. To date, Defendant Standard Industrial Towel & Uniform
17 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
18 of costs incurred by the Plaintiffs at the BKK Class I Facility.

19 408. Upon information and belief, Defendant Standard Motor Products, Inc.
20 is the successor to Cali-Blok and/or otherwise liable for manifested waste that was
21 contributed to the BKK Class I Facility by Cali-Blok. According to historical BKK
22 Corp. records, Cali-Blok contributed manifested waste to the BKK Class I Facility.
23 This manifested waste contained Hazardous Substances that Cali-Blok generated
24 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
25 Standard Motor Products, Inc. has not incurred any costs at the BKK Class I
26 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
27 Class I Facility.

28 409. Upon information and belief, Defendant Stanley Black & Decker, Inc.

1 is the successor to Emhart Industries, Inc., American Tool & Engineering Corp.,
2 Black & Decker, Price Pfister *nka* Pfister, Proto Tool and/or Stanley Home
3 Products and/or is otherwise liable for manifested waste that was contributed to the
4 BKK Class I Facility by Emhart Industries, Inc., American Tool & Engineering
5 Corp., Black & Decker, Price Pfister *nka* Pfister, Proto Tool and/or Stanley Home
6 Products. According to historical BKK Corp. records, Emhart Industries, Inc.,
7 American Tool & Engineering Corp., Black & Decker, Price Pfister *nka* Pfister,
8 Proto Tool and Stanley Home Products contributed manifested waste to the BKK
9 Class I Facility. This manifested waste contained Hazardous Substances that
10 Emhart Industries, Inc., American Tool & Engineering Corp., Black & Decker,
11 Price Pfister *nka* Pfister, Proto Tool and Stanley Home Products each generated
12 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
13 Stanley Black & Decker, Inc. has not incurred any costs at the BKK Class I Facility
14 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
15 Facility.

16 410. According to historical BKK Corp. records, Defendant Structural
17 Composite Industries contributed manifested waste to the BKK Class I Facility.
18 This manifested waste contained Hazardous Substances that Defendant Structural
19 Composite Industries generated and/or arranged for its disposal at the BKK Class I
20 Facility. To date, Defendant Structural Composite Industries has not incurred any
21 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
22 the Plaintiffs at the BKK Class I Facility.

23 411. According to historical BKK Corp. records, Defendant Sun
24 Exploration contributed manifested waste to the BKK Class I Facility. This
25 manifested waste contained Hazardous Substances that Defendant Sun Exploration
26 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
27 Defendant Sun Exploration has not incurred any costs at the BKK Class I Facility
28 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I

1 Facility.

2 412. Upon information and belief, Defendant Sun Capital Partners, Inc. is
3 the successor to Keuffel & Esser Co. and/or Royal Aluminum Co. and/or otherwise
4 liable for manifested waste that was contributed to the BKK Class I Facility by
5 Keuffel & Esser Co. and/or Royal Aluminum Co. According to historical BKK
6 Corp. records, Keuffel & Esser Co. and Royal Aluminum Co. contributed
7 manifested waste to the BKK Class I Facility. This manifested waste contained
8 Hazardous Substances that Keuffel & Esser Co. and Royal Aluminum Co.
9 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
10 Defendant Sun Capital Partners, Inc. has not incurred any costs at the BKK Class I
11 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
12 Class I Facility.

13 413. According to historical BKK Corp. records, Defendant Sweco, Inc.
14 contributed manifested waste to the BKK Class I Facility. This manifested waste
15 contained Hazardous Substances that Defendant Sweco, Inc. generated and/or
16 arranged for its disposal at the BKK Class I Facility. To date, Defendant Sweco,
17 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
18 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

19 414. Upon information and belief, Defendant Sweco, Inc. is the successor to
20 Southwestern Engineering and/or otherwise liable for manifested waste that was
21 contributed to the BKK Class I Facility by Southwestern Engineering. According
22 to historical BKK Corp. records, Southwestern Engineering contributed manifested
23 waste to the BKK Class I Facility. This manifested waste contained Hazardous
24 Substances that Southwestern Engineering generated and/or arranged for its
25 disposal at the BKK Class I Facility. To date, Defendant Sweco, Inc. has not
26 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
27 incurred by the Plaintiffs at the BKK Class I Facility.

28 415. According to historical BKK Corp. records, Defendant T.P. Industrial

1 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
2 waste contained Hazardous Substances that Defendant T.P. Industrial Inc.
3 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
4 Defendant T.P. Industrial Inc. has not incurred any costs at the BKK Class I
5 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
6 Class I Facility.

7 416. According to historical BKK Corp. records, Defendant TDY
8 Industries, LLC and/or its predecessor TDY Industries, Inc. contributed manifested
9 waste to the BKK Class I Facility. This manifested waste contained Hazardous
10 Substances that Defendant TDY Industries, LLC and/or its predecessor TDY
11 Industries, Inc. generated and/or arranged for its disposal at the BKK Class I
12 Facility. To date, Defendant TDY Industries, LLC has not incurred any costs at the
13 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
14 at the BKK Class I Facility.

15 417. Upon information and belief, Defendant Telair US LLC is the
16 successor to Brooks & Perkins Brownline Division and/or otherwise liable for
17 manifested waste that was contributed to the BKK Class I Facility by Brooks &
18 Perkins Brownline Division. According to historical BKK Corp. records, Brooks &
19 Perkins Brownline Division contributed manifested waste to the BKK Class I
20 Facility. This manifested waste contained Hazardous Substances that Brooks &
21 Perkins Brownline Division generated and/or arranged for its disposal at the BKK
22 Class I Facility. To date, Defendant Telair US LLC has not incurred any costs at the
23 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
24 at the BKK Class I Facility.

25 418. Upon information and belief, Defendant Tenneco Inc. is the successor
26 to Packaging Corp. of America and/or otherwise liable for manifested waste that
27 was contributed to the BKK Class I Facility by Packaging Corp. of America.
28 According to historical BKK Corp. records, Packaging Corp. of America

1 contributed manifested waste to the BKK Class I Facility. This manifested waste
2 contained Hazardous Substances that Packaging Corp. of America generated and/or
3 arranged for its disposal at the BKK Class I Facility. To date, Defendant Tenneco
4 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
5 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

6 419. According to historical BKK Corp. records, Defendant Tenneco Oil
7 Co. contributed manifested waste to the BKK Class I Facility. This manifested
8 waste contained Hazardous Substances that Defendant Tenneco Oil Co. generated
9 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
10 Tenneco Oil Co. has not incurred any costs at the BKK Class I Facility nor has it
11 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

12 420. Upon information and belief, Defendant Tesla, Inc. is the successor to
13 Maxwell Laboratories Inc. and/or otherwise liable for manifested waste that was
14 contributed to the BKK Class I Facility by Maxwell Laboratories Inc. According to
15 historical BKK Corp. records, Maxwell Laboratories Inc. contributed manifested
16 waste to the BKK Class I Facility. This manifested waste contained Hazardous
17 Substances that Maxwell Laboratories Inc. generated and/or arranged for its
18 disposal at the BKK Class I Facility. To date, Defendant Tesla, Inc. has not
19 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
20 incurred by the Plaintiffs at the BKK Class I Facility.

21 421. Upon information and belief, Defendant The Save Mart Companies,
22 LLC is the successor to Lucky Stores Inc. and/or otherwise liable for manifested
23 waste that was contributed to the BKK Class I Facility by Lucky Stores Inc.
24 According to historical BKK Corp. records, Lucky Stores Inc. contributed
25 manifested waste to the BKK Class I Facility. This manifested waste contained
26 Hazardous Substances that Lucky Stores Inc. generated and/or arranged for its
27 disposal at the BKK Class I Facility. To date, Defendant The Save Mart
28 Companies, LLC has not incurred any costs at the BKK Class I Facility nor has it

1 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

2 422. According to historical BKK Corp. records, Defendant Thompson
3 Industries contributed manifested waste to the BKK Class I Facility. This
4 manifested waste contained Hazardous Substances that Defendant Thompson
5 Industries generated and/or arranged for its disposal at the BKK Class I Facility.
6 To date, Defendant Thompson Industries has not incurred any costs at the BKK
7 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
8 BKK Class I Facility.

9 423. According to historical BKK Corp. records, Defendant Thorpe
10 Insulation Co. contributed manifested waste to the BKK Class I Facility. This
11 manifested waste contained Hazardous Substances that Defendant Thorpe
12 Insulation Co. generated and/or arranged for its disposal at the BKK Class I
13 Facility. To date, Defendant Thorpe Insulation Co. has not incurred any costs at the
14 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
15 at the BKK Class I Facility.

16 424. According to historical BKK Corp. records, Defendant Times Mirror
17 Press contributed manifested waste to the BKK Class I Facility. This manifested
18 waste contained Hazardous Substances that Defendant Times Mirror Press
19 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
20 Defendant Times Mirror Press has not incurred any costs at the BKK Class I
21 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
22 Class I Facility.

23 425. According to historical BKK Corp. records, Defendant Tooley & Co.
24 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
25 waste contained Hazardous Substances that Defendant Tooley & Co. Inc. generated
26 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
27 Tooley & Co. Inc. has not incurred any costs at the BKK Class I Facility nor has it
28 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 426. Upon information and belief, Defendant Toppan Printing Company
2 (America), Inc. is the successor to Industrial Circuits and/or otherwise liable for
3 manifested waste that was contributed to the BKK Class I Facility by Industrial
4 Circuits. According to historical BKK Corp. records, Industrial Circuits
5 contributed manifested waste to the BKK Class I Facility. This manifested waste
6 contained Hazardous Substances that Industrial Circuits generated and/or arranged
7 for its disposal at the BKK Class I Facility. To date, Defendant Toppan Printing
8 Company (America), Inc. has not incurred any costs at the BKK Class I Facility nor
9 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
10 Facility.

11 427. According to historical BKK Corp. records, Defendant Toyota Motor
12 Manufacturing USA contributed manifested waste to the BKK Class I Facility.
13 This manifested waste contained Hazardous Substances that Defendant Toyota
14 Motor Manufacturing USA generated and/or arranged for its disposal at the BKK
15 Class I Facility. To date, Defendant Toyota Motor Manufacturing USA has not
16 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
17 incurred by the Plaintiffs at the BKK Class I Facility.

18 428. According to historical BKK Corp. records, Defendant Trammel Crow
19 Company contributed manifested waste to the BKK Class I Facility. This
20 manifested waste contained Hazardous Substances that Defendant Trammel Crow
21 Company generated and/or arranged for its disposal at the BKK Class I Facility. To
22 date, Defendant Trammel Crow Company has not incurred any costs at the BKK
23 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
24 BKK Class I Facility.

25 429. Upon information and belief, Defendant Trammel Crow Company is
26 the successor to Tooley & Co. Inc. and/or otherwise liable for manifested waste that
27 was contributed to the BKK Class I Facility by Tooley & Co. Inc. According to
28 historical BKK Corp. records, Tooley & Co. Inc. contributed manifested waste to

1 the BKK Class I Facility. This manifested waste contained Hazardous Substances
2 that Tooley & Co. Inc. generated and/or arranged for its disposal at the BKK Class I
3 Facility. To date, Defendant Trammel Crow Company has not incurred any costs at
4 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
5 Plaintiffs at the BKK Class I Facility.

6 430. According to historical BKK Corp. records, Defendant Transequip
7 Pacific Inc. contributed manifested waste to the BKK Class I Facility. This
8 manifested waste contained Hazardous Substances that Defendant Transequip
9 Pacific Inc. generated and/or arranged for its disposal at the BKK Class I Facility.
10 To date, Defendant Transequip Pacific Inc. has not incurred any costs at the BKK
11 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
12 BKK Class I Facility.

13 431. According to historical BKK Corp. records, Defendant TRE Corp.
14 contributed manifested waste to the BKK Class I Facility. This manifested waste
15 contained Hazardous Substances that Defendant TRE Corp. generated and/or
16 arranged for its disposal at the BKK Class I Facility. To date, Defendant TRE Corp.
17 has not incurred any costs at the BKK Class I Facility nor has it paid its fair share
18 of costs incurred by the Plaintiffs at the BKK Class I Facility.

19 432. According to historical BKK Corp. records, Defendant Treatolite
20 Corp. contributed manifested waste to the BKK Class I Facility. This manifested
21 waste contained Hazardous Substances that Defendant Treatolite Corp. generated
22 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
23 Treatolite Corp. has not incurred any costs at the BKK Class I Facility nor has it
24 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

25 433. Upon information and belief, Defendant Tribune Publishing Company
26 is the successor to Times Mirror Press and/or otherwise liable for manifested waste
27 that was contributed to the BKK Class I Facility by Times Mirror Press. According
28 to historical BKK Corp. records, Times Mirror Press contributed manifested waste

1 to the BKK Class I Facility. This manifested waste contained Hazardous
2 Substances that Times Mirror Press generated and/or arranged for its disposal at the
3 BKK Class I Facility. To date, Defendant Tribune Publishing Company has not
4 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
5 incurred by the Plaintiffs at the BKK Class I Facility.

6 434. Upon information and belief, Defendant TriMas Corporation is the
7 successor to Price Pfister *nka* Pfister and/or is otherwise liable for manifested waste
8 that was contributed to the BKK Class I Facility by Price Pfister *nka* Pfister.
9 According to historical BKK Corp. records, Price Pfister *nka* Pfister contributed
10 manifested waste to the BKK Class I Facility. This manifested waste contained
11 Hazardous Substances that Price Pfister *nka* Pfister generated and/or arranged for
12 its disposal at the BKK Class I Facility. To date, Defendant TriMas Corporation has
13 not incurred any costs at the BKK Class I Facility nor has it paid its fair share of
14 costs incurred by the Plaintiffs at the BKK Class I Facility.

15 435. Upon information and belief, Defendant Triumph Group Operations is
16 the successor to Los Angeles Gauge Co. and/or is otherwise liable for manifested
17 waste that was contributed to the BKK Class I Facility by Los Angeles Gauge Co.
18 According to historical BKK Corp. records, Los Angeles Gauge Co. contributed
19 manifested waste to the BKK Class I Facility. This manifested waste contained
20 Hazardous Substances that Los Angeles Gauge Co. generated and/or arranged for
21 its disposal at the BKK Class I Facility. To date, Defendant Triumph Group
22 Operations has not incurred any costs at the BKK Class I Facility nor has it paid its
23 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

24 436. According to historical BKK Corp. records, Defendant Trizec
25 Properties contributed manifested waste to the BKK Class I Facility. This
26 manifested waste contained Hazardous Substances that Defendant Trizec Properties
27 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
28 Defendant Trizec Properties has not incurred any costs at the BKK Class I Facility

1 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
2 Facility.

3 437. According to historical BKK Corp. records, Defendant Trojan Battery
4 Co. contributed manifested waste to the BKK Class I Facility. This manifested
5 waste contained Hazardous Substances that Defendant Trojan Battery Co.
6 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
7 Defendant Trojan Battery Co. has not incurred any costs at the BKK Class I
8 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
9 Class I Facility.

10 438. According to historical BKK Corp. records, Defendant Truck
11 Transport contributed manifested waste to the BKK Class I Facility. This
12 manifested waste contained Hazardous Substances that Defendant Truck Transport
13 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
14 Defendant Truck Transport has not incurred any costs at the BKK Class I Facility
15 nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
16 Facility.

17 439. Upon information and belief, Defendant TRZ Holdings LLC is the
18 successor to Trizec Properties and/or otherwise liable for manifested waste that was
19 contributed to the BKK Class I Facility by Trizec Properties. According to
20 historical BKK Corp. records, Trizec Properties contributed manifested waste to the
21 BKK Class I Facility. This manifested waste contained Hazardous Substances that
22 Trizec Properties generated and/or arranged for its disposal at the BKK Class I
23 Facility. To date, Defendant TRZ Holdings LLC has not incurred any costs at the
24 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
25 at the BKK Class I Facility.

26 440. Upon information and belief, Defendant Turkish Products, Inc. is the
27 successor to Purex Corp. and/or otherwise liable for manifested waste that was
28 contributed to the BKK Class I Facility by Purex Corp. According to historical

1 BKK Corp. records, Purex Corp. contributed manifested waste to the BKK Class I
2 Facility. This manifested waste contained Hazardous Substances that Purex Corp.
3 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
4 Defendant Turkish Products, Inc. has not incurred any costs at the BKK Class I
5 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
6 Class I Facility.

7 441. According to historical BKK Corp. records, Defendant U.S. Borax &
8 Chemical Corp. contributed manifested waste to the BKK Class I Facility. This
9 manifested waste contained Hazardous Substances that Defendant U.S. Borax &
10 Chemical Corp. generated and/or arranged for its disposal at the BKK Class I
11 Facility. To date, Defendant U.S. Borax & Chemical Corp. has not incurred any
12 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
13 the Plaintiffs at the BKK Class I Facility.

14 442. According to historical BKK Corp. records, Defendant U.S. Brass
15 Division contributed manifested waste to the BKK Class I Facility. This manifested
16 waste contained Hazardous Substances that Defendant U.S. Brass Division
17 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
18 Defendant U.S. Brass Division has not incurred any costs at the BKK Class I
19 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
20 Class I Facility.

21 443. According to historical BKK Corp. records, Defendant U.S. Filters
22 contributed manifested waste to the BKK Class I Facility. This manifested waste
23 contained Hazardous Substances that Defendant U.S. Filters. generated and/or
24 arranged for its disposal at the BKK Class I Facility. To date, Defendant U.S.
25 Filters has not incurred any costs at the BKK Class I Facility nor has it paid its fair
26 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

27 444. According to historical BKK Corp. records, Defendant U.S. Reduction
28 Co. contributed manifested waste to the BKK Class I Facility. This manifested

1 waste contained Hazardous Substances that Defendant U.S. Reduction Co.
2 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
3 Defendant U.S. Reduction Co. has not incurred any costs at the BKK Class I
4 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
5 Class I Facility.

6 445. According to historical BKK Corp. records, Defendant Ultramar Inc.
7 contributed manifested waste to the BKK Class I Facility. This manifested waste
8 contained Hazardous Substances that Defendant Ultramar Inc. generated and/or
9 arranged for its disposal at the BKK Class I Facility. To date, Defendant Ultramar
10 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
11 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

12 446. According to historical BKK Corp. records, Defendant United
13 Coatings Inc. contributed manifested waste to the BKK Class I Facility. This
14 manifested waste contained Hazardous Substances that Defendant United Coatings
15 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
16 Defendant United Coatings Inc. has not incurred any costs at the BKK Class I
17 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
18 Class I Facility.

19 447. According to historical BKK Corp. records, Defendant Valco
20 contributed manifested waste to the BKK Class I Facility. This manifested waste
21 contained Hazardous Substances that Defendant Valco generated and/or arranged
22 for its disposal at the BKK Class I Facility. To date, Defendant Valco has not
23 incurred any costs at the BKK Class I Facility nor has it paid its fair share of costs
24 incurred by the Plaintiffs at the BKK Class I Facility.

25 448. According to historical BKK Corp. records, Defendant Valentec
26 International Corp. contributed manifested waste to the BKK Class I Facility. This
27 manifested waste contained Hazardous Substances that Defendant Valentec
28 International Corp. generated and/or arranged for its disposal at the BKK Class I

1 Facility. To date, Defendant Valentec International Corp. has not incurred any
2 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
3 the Plaintiffs at the BKK Class I Facility.

4 449. Upon information and belief, Defendant Valero Energy Corporation is
5 the successor to Ultramar Inc. and/or otherwise liable for manifested waste that was
6 contributed to the BKK Class I Facility by Ultramar Inc. According to historical
7 BKK Corp. records, Ultramar Inc. contributed manifested waste to the BKK Class I
8 Facility. This manifested waste contained Hazardous Substances that Ultramar Inc.
9 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
10 Defendant Valero Energy Corporation has not incurred any costs at the BKK Class
11 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
12 Class I Facility.

13 450. According to historical BKK Corp. records, Defendant Van De Kamp
14 contributed manifested waste to the BKK Class I Facility. This manifested waste
15 contained Hazardous Substances that Defendant Van De Kamp generated and/or
16 arranged for its disposal at the BKK Class I Facility. To date, Defendant Van De
17 Kamp has not incurred any costs at the BKK Class I Facility nor has it paid its fair
18 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

19 451. According to historical BKK Corp. records, Defendant Varco
20 International contributed manifested waste to the BKK Class I Facility. This
21 manifested waste contained Hazardous Substances that Defendant Varco
22 International generated and/or arranged for its disposal at the BKK Class I Facility.
23 To date, Defendant Varco International has not incurred any costs at the BKK Class
24 I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
25 Class I Facility.

26 452. Upon information and belief, Defendant Veolia Environmental
27 Services North America, LLC is the successor to Heist Maintenance Services Inc.
28 and/or otherwise liable for manifested waste that was contributed to the BKK Class

1 I Facility by Heist Maintenance Services Inc. According to historical BKK Corp.
2 records, Heist Maintenance Services Inc. contributed manifested waste to the BKK
3 Class I Facility. This manifested waste contained Hazardous Substances that Heist
4 Maintenance Services Inc. generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant Veolia Environmental Services North America,
6 LLC has not incurred any response costs at the BKK Class I Facility nor has it paid
7 its fair share of response costs incurred by the Plaintiffs at the BKK Class I Facility.

8 453. Upon information and belief, Defendant Verizon New York Inc. is the
9 successor to Greer Hydraulics Inc. and/or otherwise liable for manifested waste that
10 was contributed to the BKK Class I Facility by Greer Hydraulics Inc. According to
11 historical BKK Corp. records, Greer Hydraulics Inc. contributed manifested waste
12 to the BKK Class I Facility. This manifested waste contained Hazardous
13 Substances that Greer Hydraulics Inc. generated and/or arranged for its disposal at
14 the BKK Class I Facility. To date, Defendant Verizon New York Inc. has not
15 incurred any response costs at the BKK Class I Facility nor has it paid its fair share
16 of response costs incurred by the Plaintiffs at the BKK Class I Facility.

17 454. Upon information and belief, Defendant Vest, Inc. is the successor to
18 Bernard Epps & Co. and/or otherwise liable for manifested waste that was
19 contributed to the BKK Class I Facility by Bernard Epps & Co. According to
20 historical BKK Corp. records, Bernard Epps & Co. contributed manifested waste to
21 the BKK Class I Facility. This manifested waste contained Hazardous Substances
22 that Bernard Epps & Co. generated and/or arranged for its disposal at the BKK
23 Class I Facility. To date, Defendant Vest, Inc. has not incurred any costs at the
24 BKK Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs
25 at the BKK Class I Facility.

26 455. Upon information and belief, Defendant VF Corporation is the
27 successor to Standard Industrial Towel & Uniform and/or otherwise liable for
28 manifested waste that was contributed to the BKK Class I Facility by Standard

1 Industrial Towel & Uniform. According to historical BKK Corp. records, Standard
2 Industrial Towel & Uniform contributed manifested waste to the BKK Class I
3 Facility. This manifested waste contained Hazardous Substances that Standard
4 Industrial Towel & Uniform generated and/or arranged for its disposal at the BKK
5 Class I Facility. To date, Defendant VF Corporation has not incurred any costs at
6 the BKK Class I Facility nor has it paid its fair share of costs incurred by the
7 Plaintiffs at the BKK Class I Facility.

8 456. According to historical BKK Corp. records, Defendant Vons
9 Companies Inc. contributed manifested waste to the BKK Class I Facility. This
10 manifested waste contained Hazardous Substances that Defendant Vons Companies
11 Inc. generated and/or arranged for its disposal at the BKK Class I Facility. To date,
12 Defendant Vons Companies Inc. has not incurred any costs at the BKK Class I
13 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
14 Class I Facility.

15 457. According to historical BKK Corp. records, Defendant Vought
16 Aircraft Industries Inc. contributed manifested waste to the BKK Class I Facility.
17 This manifested waste contained Hazardous Substances that Defendant Vought
18 Aircraft Industries Inc. generated and/or arranged for its disposal at the BKK Class
19 I Facility. To date, Defendant Vought Aircraft Industries Inc. has not incurred any
20 costs at the BKK Class I Facility nor has it paid its fair share of costs incurred by
21 the Plaintiffs at the BKK Class I Facility.

22 458. Upon information and belief, Defendant WM Healthcare Solutions,
23 Inc. is the successor to Gray Truck Lines and/or otherwise liable for manifested
24 waste that was contributed to the BKK Class I Facility by Gray Truck Lines.
25 According to historical BKK Corp. records, Gray Truck Lines contributed
26 manifested waste to the BKK Class I Facility. This manifested waste contained
27 Hazardous Substances that Gray Truck Lines generated and/or arranged for its
28 disposal at the BKK Class I Facility. To date, Defendant WM Healthcare Solutions,

1 Inc. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
2 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

3 459. According to historical BKK Corp. records, Defendant W. Smith Co.
4 contributed manifested waste to the BKK Class I Facility. This manifested waste
5 contained Hazardous Substances that Defendant W. Smith Co. generated and/or
6 arranged for its disposal at the BKK Class I Facility. To date, Defendant W. Smith
7 Co. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
8 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

9 460. According to historical BKK Corp. records, Defendant W. Smith Co.
10 Container Reconditioning contributed manifested waste to the BKK Class I
11 Facility. This manifested waste contained Hazardous Substances that Defendant W.
12 Smith Co. Container Reconditioning generated and/or arranged for its disposal at
13 the BKK Class I Facility. To date, Defendant W. Smith Co. Container
14 Reconditioning has not incurred any costs at the BKK Class I Facility nor has it
15 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

16 461. According to historical BKK Corp. records, Defendant Weber Aircraft
17 contributed manifested waste to the BKK Class I Facility. This manifested waste
18 contained Hazardous Substances that Defendant Weber Aircraft generated and/or
19 arranged for its disposal at the BKK Class I Facility. To date, Defendant Weber
20 Aircraft has not incurred any costs at the BKK Class I Facility nor has it paid its
21 fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

22 462. Upon information and belief, Defendant Wells Fargo Rail Corporation
23 is the successor to North American Car Corp. and/or otherwise liable for manifested
24 waste that was contributed to the BKK Class I Facility by North American Car
25 Corp. According to historical BKK Corp. records, North American Car Corp.
26 contributed manifested waste to the BKK Class I Facility. This manifested waste
27 contained Hazardous Substances that North American Car Corp. generated and/or
28 arranged for its disposal at the BKK Class I Facility. To date, Defendant Wells

1 Fargo Rail Corporation has not incurred any costs at the BKK Class I Facility nor
2 has it paid its fair share of costs incurred by the Plaintiffs at the BKK Class I
3 Facility.

4 463. According to historical BKK Corp. records, Defendant Wells Marine
5 Inc. contributed manifested waste to the BKK Class I Facility. This manifested
6 waste contained Hazardous Substances that Defendant Wells Marine Inc. generated
7 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
8 Wells Marine Inc. has not incurred any costs at the BKK Class I Facility nor has it
9 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

10 464. According to historical BKK Corp. records, Defendant Weslock Corp.
11 contributed manifested waste to the BKK Class I Facility. This manifested waste
12 contained Hazardous Substances that Defendant Weslock Corp. generated and/or
13 arranged for its disposal at the BKK Class I Facility. To date, Defendant Weslock
14 Corp. has not incurred any costs at the BKK Class I Facility nor has it paid its fair
15 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

16 465. According to historical BKK Corp. records, Defendant West Valley
17 Toyota contributed manifested waste to the BKK Class I Facility. This manifested
18 waste contained Hazardous Substances that Defendant West Valley Toyota
19 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
20 Defendant West Valley Toyota has not incurred any costs at the BKK Class I
21 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
22 Class I Facility.

23 466. According to historical BKK Corp. records, Defendant Western Kraft
24 Corp. contributed manifested waste to the BKK Class I Facility. This manifested
25 waste contained Hazardous Substances that Defendant Western Kraft Corp.
26 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
27 Defendant Western Kraft Corp. has not incurred any costs at the BKK Class I
28 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK

1 Class I Facility.

2 467. According to historical BKK Corp. records, Defendant Western
3 Lithograph contributed manifested waste to the BKK Class I Facility. This
4 manifested waste contained Hazardous Substances that Defendant Western
5 Lithograph generated and/or arranged for its disposal at the BKK Class I Facility.
6 To date, Defendant Western Lithograph has not incurred any costs at the BKK
7 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
8 BKK Class I Facility.

9 468. According to historical BKK Corp. records, Defendant Western
10 Synthetic Felt Co. contributed manifested waste to the BKK Class I Facility. This
11 manifested waste contained Hazardous Substances that Defendant Western
12 Synthetic Felt Co. generated and/or arranged for its disposal at the BKK Class I
13 Facility. To date, Defendant Western Synthetic Felt Co. has not incurred any costs
14 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
15 Plaintiffs at the BKK Class I Facility.

16 469. According to historical BKK Corp. records, Defendant Westminster
17 Ceramics Inc. contributed manifested waste to the BKK Class I Facility. This
18 manifested waste contained Hazardous Substances that Defendant Westminster
19 Ceramics Inc. generated and/or arranged for its disposal at the BKK Class I
20 Facility. To date, Defendant Westminster Ceramics Inc. has not incurred any costs
21 at the BKK Class I Facility nor has it paid its fair share of costs incurred by the
22 Plaintiffs at the BKK Class I Facility.

23 470. According to historical BKK Corp. records, Defendant Whittaker
24 Corp. contributed manifested waste to the BKK Class I Facility. This manifested
25 waste contained Hazardous Substances that Defendant Whittaker Corp. generated
26 and/or arranged for its disposal at the BKK Class I Facility. To date, Defendant
27 Whittaker Corp. has not incurred any costs at the BKK Class I Facility nor has it
28 paid its fair share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 471. According to historical BKK Corp. records, Defendant Windowmaster
2 Products contributed manifested waste to the BKK Class I Facility. This manifested
3 waste contained Hazardous Substances that Defendant Windowmaster Products
4 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
5 Defendant Windowmaster Products has not incurred any costs at the BKK Class I
6 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
7 Class I Facility.

8 472. Upon information and belief, Defendant Woodward HRT, Inc. is the
9 successor to HR Textron Inc. and/or otherwise liable for manifested waste that was
10 contributed to the BKK Class I Facility by HR Textron Inc. According to historical
11 BKK Corp. records, HR Textron Inc. contributed manifested waste to the BKK
12 Class I Facility. This manifested waste contained Hazardous Substances that HR
13 Textron Inc. generated and/or arranged for its disposal at the BKK Class I Facility.
14 To date, Defendant Woodward HRT, Inc. has not incurred any costs at the BKK
15 Class I Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the
16 BKK Class I Facility.

17 473. According to historical BKK Corp. records, Defendant Xtra Energy
18 contributed manifested waste to the BKK Class I Facility. This manifested waste
19 contained Hazardous Substances that Defendant Xtra Energy generated and/or
20 arranged for its disposal at the BKK Class I Facility. To date, Defendant Xtra
21 Energy has not incurred any costs at the BKK Class I Facility nor has it paid its fair
22 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 474. According to historical BKK Corp. records, Defendant Yoplait USA
24 contributed manifested waste to the BKK Class I Facility. This manifested waste
25 contained Hazardous Substances that Defendant Yoplait USA generated and/or
26 arranged for its disposal at the BKK Class I Facility. To date, Defendant Yoplait
27 USA has not incurred any costs at the BKK Class I Facility nor has it paid its fair
28 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

1 475. According to historical BKK Corp. records, Defendant Zimmers Truck
2 Stop contributed manifested waste to the BKK Class I Facility. This manifested
3 waste contained Hazardous Substances that Defendant Zimmers Truck Stop
4 generated and/or arranged for its disposal at the BKK Class I Facility. To date,
5 Defendant Zimmers Truck Stop has not incurred any costs at the BKK Class I
6 Facility nor has it paid its fair share of costs incurred by the Plaintiffs at the BKK
7 Class I Facility.

8 476. Paragraphs 476 to 806 are reserved.

9 807. Each Defendant has declined or not responded to Plaintiffs' request(s)
10 to enter into, or has otherwise not entered into, a tolling agreement to facilitate
11 settlement discussions. A number of other PRPs at the BKK Class I Facility have
12 entered into tolling agreements with the Plaintiffs, and Plaintiffs will attempt to
13 resolve the liabilities of those PRPs without litigation.

14 808. On information and belief, each Defendant, including any of its
15 assignees, predecessors, successors in interest, or alter egos, is a "person" who
16 either (a) by contract, agreement, or otherwise, arranged for disposal or treatment,
17 or (b) arranged with a transporter for disposal or treatment, of Hazardous
18 Substances at the BKK Class I Facility.

19 809. On information and belief, between approximately 1969 and 1987,
20 Does 1-10 disposed or arranged for the disposal of Hazardous Substances at the
21 BKK Class I Facility but have not incurred any costs, nor have they paid their fair
22 share of costs incurred by the Plaintiffs at the BKK Class I Facility.

23 **FACTUAL ALLEGATIONS COMMON TO ALL CLAIMS**

24 810. At all times relevant to this action, the BKK Class I Facility was
25 operated by BKK Corporation ("BKK Corp.") and/or other third parties, and was
26 also owned by BKK Corp. from approximately 1973 through the present.

27 811. Beginning in at least 1969 and continuing to approximately 1984, the
28 BKK Class I Facility accepted manifested waste, which included Hazardous

1 Substances, for disposal. After 1984, the BKK Class I Facility continued accepting
2 municipal waste, including asbestos.

3 812. The BKK Class I Facility ceased accepting waste in 1987, at which
4 time BKK Corp. began to undertake landfill closure and post-closure activities.

5 813. By letters dated October 18 and October 20, 2004, “BKK [Corp.]
6 notified DTSC that for financial reasons, BKK [Corp.] would no longer be able to
7 perform required post-closure care of the [BKK Class I Facility], including
8 operation of the LTP, after November 17, 2004. As a result, DTSC . . . hired a
9 contractor to conduct emergency response activities at the [BKK Class I Facility].”
10 Imminent and Substantial Endangerment Determination and Order and Remedial
11 Action Order Docket No. I/SE-D 04/05-004 (“ISE Order”), 14.

12 814. On December 2, 2004, DTSC issued the ISE Order to BKK Corp. and
13 50 other respondents who were alleged to have “arranged by contract, agreement or
14 otherwise for the disposal of [their] disposed hazardous substances/wastes” at the
15 BKK Class I Facility, or who were alleged to be an “owner and operator” of the
16 BKK Class I Facility. A true and correct copy of the ISE Order is attached hereto
17 as **Exhibit B**.

18 815. In the ISE Order, DTSC asserts that “[t]here has been a ‘release’
19 and/or there is a ‘threatened release’ of hazardous substances” at the BKK Class I
20 Facility.

21 816. The ISE Order required the recipients of the order to perform certain
22 specified environmental response actions and to reimburse DTSC for the response
23 actions it had taken at the BKK Class I Facility.

24 817. In 2004, certain recipients of the ISE Order formed the BKK Working
25 Group for the purpose of cooperating with DTSC to address conditions at the BKK
26 Class I Facility. Immediately thereafter, the BKK Working Group and DTSC
27 commenced negotiations to seek a settlement to address conditions at the BKK
28 Class I Facility. Prior to finalizing this settlement, the BKK Working Group and

1 each of its then-members incurred necessary response costs at the BKK Class I
2 Facility that are consistent with the NCP.

3 818. The composition of the BKK Working Group has changed over time
4 and continues to change. New members pay an interim allocated share of past and
5 ongoing costs. Each Plaintiff, as a member of the BKK Working Group, has
6 incurred necessary response costs consistent with the NCP.

7 819. On October 31, 2005, the State of California, through its agency
8 DTSC, filed a Complaint against certain members of the BKK Working Group in
9 case number CV 05-7746 CAS (JWJx) (C.D. Cal. 2005) (hereinafter “Initial Site
10 Action”). In the Initial Site Action Complaint, the State of California sought
11 recovery of past response costs pursuant to Section 107 of CERCLA; declaratory
12 relief pursuant to Section 113 of CERCLA; and injunctive relief pursuant to CAL.
13 HEALTH & SAFETY CODE § 25358.3(e) from certain members of the BKK Working
14 Group relating to the BKK Class I Facility. The Initial Site Action Complaint was
15 filed concurrently with the lodging of a consent decree between certain members of
16 the BKK Working Group and DTSC that addressed conditions at the BKK Class I
17 Facility.

18 820. On February 8, 2006, the State of California, through its agency
19 DTSC, lodged an Amended Consent Decree (“First Consent Decree”) in the Initial
20 Site Action. The First Consent Decree, attached hereto as **Exhibit C**, was entered
21 on March 9, 2006.

22 821. Among other things, the First Consent Decree obligated certain
23 members of the BKK Working Group to perform environmental response actions at
24 the BKK Class I Facility, to reimburse DTSC for certain of its past response costs,
25 and to pay DTSC for its continuing oversight of the environmental response work
26 at the BKK Class I Facility. The response actions have included investigation
27 activities.
28

1 822. The First Consent Decree also “resolves the liability of [the members
2 of the BKK Working Group] for Past Response Costs . . .” and provides members
3 of the BKK Working Group with “protection from contribution actions or claims as
4 provided by CERCLA Section 113(f)(2), 42 U.S.C. § 9613(f)(2) for matters
5 addressed in [the First Consent Decree]. The matters addressed in [the First
6 Consent Decree] are (a) the Work to be Performed by [the BKK Working Group] . .
7 . (b) Past Response Costs; (c) Future Interim Response Costs; (d) Future DTSC
8 Oversight Costs; (e) interest on amounts referred to in (b), (c), and (d) above, and
9 (f) compliance with the ISE Order from its effective date through the date on which
10 it is dismissed as provided in [the First Consent Decree].” First Consent Decree at
11 ¶ 8.1.

12 823. Upon entry of the First Consent Decree, the BKK Working Group
13 began performing environmental response work, including site investigation, at the
14 BKK Class I Facility under the oversight of DTSC. All work performed under the
15 First Consent Decree is deemed to be, and was, necessary and performed in
16 accordance with the NCP.

17 824. On May 5, 2010, the State of California, through its agency DTSC,
18 filed a second complaint against certain members of the BKK Working Group in
19 case number CV 10-3378 RGK (AJWx) (C.D. Cal. 2010) (hereinafter “Second Site
20 Action”). Like the Initial Site Action Complaint, the Second Site Action Complaint
21 sought recovery of past response costs, including investigation costs, pursuant to
22 Section 107 of CERCLA; declaratory relief pursuant to Section 113 of CERCLA;
23 and injunctive relief pursuant to Cal. Health & Safety Code § 25358.3(e) from
24 certain members of the BKK Working Group relating to the BKK Class I Facility.

25 825. At that same time, the State of California, through its agency DTSC,
26 lodged a Second Consent Decree (“Second Consent Decree”) with the Court,
27 obligating the BKK Working Group to perform additional response actions,
28 including investigation activities, at the BKK Class I Facility, to reimburse DTSC

1 for certain of its past response costs, including investigation costs, and to pay future
2 oversight costs to DTSC on an ongoing basis. The Second Consent Decree,
3 attached hereto as **Exhibit D**, was entered on August 10, 2010.

4 826. Among other things, the Second Consent Decree obligates certain
5 members of the BKK Working Group to perform environmental response actions,
6 including investigation activities, at the BKK Class I Facility, to reimburse DTSC
7 for certain of its response costs, including investigation costs, to pay DTSC for its
8 continuing oversight of the environmental response work at the BKK Class I
9 Facility, and to conduct an Engineering Evaluation/Cost Analysis (“EE/CA”) of the
10 BKK Class I Facility. Second Consent Decree at ¶ 4.1.2 and Ex. D (EE/CA
11 Statement of Work). The EE/CA is to propose a non-time critical removal action
12 that contributes to the efficient performance of any long-term remedial action for
13 the BKK Class I Facility. It is anticipated that a remedial investigation/feasibility
14 study and remedial actions will be conducted at the BKK Class I Facility at the
15 conclusion of the EE/CA. It is anticipated that DTSC will select further appropriate
16 response actions to be performed at the BKK Class Facility based on the EE/CA.

17 827. Among other things, the Second Consent Decree provides certain
18 members of the BKK Working Group with “protection from contribution actions or
19 claims as provided by CERCLA Section 113(f)(2), 42 U.S.C. § 9613(f)(2) for
20 matters addressed in the Second Consent Decree. The matters addressed in the
21 Second Consent Decree are (a) the Work to be Performed by [the BKK Working
22 Group] . . . (b) Past Response Costs . . . ; and (c) Future DTSC Oversight Costs . . .
23 .” Second Consent Decree at ¶ 8.1.

24 828. From August 10, 2010 until the present, the BKK Working Group
25 performed and continues to perform environmental response work, including site
26 investigation, at the BKK Class I Facility under the Second Consent Decree. All
27 work performed under the Second Consent Decree is deemed to be, and was,
28 necessary and performed in accordance with the NCP.

1 829. On February 2, 2015, the State of California, through its agency
2 DTSC, filed a third complaint against certain members of the BKK Working Group
3 in case number CV 15-729 DDP (AJWx) (C.D. Cal. 2015) (hereinafter “Third Site
4 Action”). Like the Initial and Second Site Action Complaints, the Third Site
5 Action Complaint sought recovery of past response costs pursuant to Section 107 of
6 CERCLA; declaratory relief pursuant to Section 113 of CERCLA; and injunctive
7 relief pursuant to Cal. Health & Safety Code § 25358.3(e) from certain members of
8 the BKK Working Group relating to the BKK Class I Facility.

9 830. At that same time, the State of California, through its agency DTSC,
10 lodged a Third Partial Consent Decree (“Third Partial Consent Decree”) with the
11 Court, obligating certain members of the BKK Working Group to perform
12 additional response actions, including investigation activities, at the BKK Class I
13 Facility, to reimburse DTSC for certain of its past response costs, including site
14 investigation activities, and to pay future oversight costs to DTSC on an ongoing
15 basis. The Third Partial Consent Decree, attached hereto as **Exhibit E**, was entered
16 on July 24, 2015.

17 831. Among other things, the Third Partial Consent Decree obligates
18 certain members of the BKK Working Group to perform environmental response
19 actions, including investigation activities, at the BKK Class I Facility, to reimburse
20 DTSC for certain of its response costs, including site investigation costs, to pay
21 DTSC for its continuing oversight of the environmental response work at the BKK
22 Class I Facility, and to conduct a Remedial Investigation/Feasibility Study
23 (“RI/FS”) for the groundwater beneath and around the BKK Class I Facility. Third
24 Partial Consent Decree at ¶ 4.1.3 and Exhibit D to the Third Partial Consent Decree
25 (RI/FS Statement of Work). The area of groundwater investigation pursuant to the
26 RI/FS includes the Class I Landfill and Class I Landfill operation areas, including
27 but not limited to, “Trash Island” located on the north side of the landfill; the
28 leachate treatment plant (LTP); Barrier 1; the upper detention basin below the LTP;

1 liquid piping and other liquid collection and conveyance systems associated with
2 the Class I Landfill; the fueling station and truck wash; and wherever hazardous
3 substances from such areas have or may come to be located. It is anticipated that
4 DTSC will select further appropriate response actions to be performed at and
5 around the BKK Class I Facility based on the RI/FS.

6 832. Among other things, the Third Partial Consent Decree provides
7 certain members of the BKK Working Group with “protection from contribution
8 actions or claims as provided by CERCLA Section 113(f)(2), 42 U.S.C. §
9 9613(f)(2) for matters addressed in the Third Partial Consent Decree. The matters
10 addressed in the Third Partial Consent Decree are (a) the Work to be Performed by
11 [members of the BKK Working Group] . . . (b) Past Response Costs . . .; and (c)
12 Future DTSC Oversight Costs . . .” Third Partial Consent Decree at ¶ 8.1.

13 833. As reflected in the BKK document archive maintained by DTSC,
14 members of the BKK Working Group also entered into additional interim
15 settlement agreements with DTSC to reimburse the State for its past response costs
16 incurred consistent with the NCP at the BKK Class I Landfill.

17 834. On July 29, 2016, the State of California, through its agency DTSC,
18 filed an amended third complaint, which joined as defendants five additional
19 members of the BKK Working Group.

20 835. At that same time, the State of California, through its agency DTSC,
21 lodged a First Amended Third Partial Consent Decree (“Amended Third Partial
22 Consent Decree”), which added the five new defendants as additional Settling
23 Defendants. The Amended Third Partial Consent Decree, attached hereto as
24 **Exhibit F**, was approved by the Court on October 18, 2016.

25 836. Among other things, the Amended Third Partial Consent Decree, like
26 the Third Partial Consent Decree, obligates certain members of the BKK Working
27 Group to perform environmental response actions at the BKK Class I Facility, to
28 reimburse DTSC for certain of its response costs, to pay DTSC for its continuing

1 oversight of the environmental response work at the BKK Class I Facility, and to
2 conduct a Remedial Investigation/Feasibility Study (“RI/FS”) for the groundwater
3 beneath and around the BKK Class I Facility. Amended Third Partial Consent
4 Decree at ¶ 4.1.3.

5 837. From July 24, 2015 until the present, the BKK Working Group
6 performed and continues to perform environmental response work, including site
7 investigation, at the BKK Class I Facility under the Amended Third Partial Consent
8 Decree. All work performed under the Amended Third Partial Consent Decree is
9 deemed to be, and was, necessary and performed in accordance with the NCP.

10 838. The response costs, including site investigation costs, incurred by the
11 Plaintiffs are necessary to address the release and/or threatened release at the BKK
12 Class I Facility and are required by DTSC in the First, Second, Third Partial, and
13 Amended Third Partial Consent Decrees. Plaintiffs will continue to incur response
14 costs, including site investigation expenses, to conduct response actions at the BKK
15 Class I Facility as required by DTSC.

16 839. Plaintiffs have incurred, and continue to incur, necessary response
17 costs, including consulting and attorney fees, consistent with the NCP at the BKK
18 Class I Facility associated with efforts to identify potentially responsible parties
19 (“PRPs”), including Defendants, that arranged for the disposal, or arranged with
20 third-party transporters for the disposal, of Hazardous Substances at the BKK Class
21 I Facility. Such efforts include working with DTSC to recover handwritten
22 manifests and other waste records from the BKK Corp. warehouse and other
23 locations, information contained on the computer system utilized by BKK Corp. at
24 the BKK Class I Facility and reviewing information available through the State of
25 California regarding manifested and other waste disposed at the BKK Class I
26 Facility. This investigation for the purpose of identification of additional PRPs is
27 ongoing.

28

1 840. The environmental conditions at the BKK Class I Facility, and the
2 attendant costs that have been and are continuing to be incurred by Plaintiffs are the
3 direct result of Defendants having arranged to dispose Hazardous Substances at the
4 BKK Class I Facility.

5 841. In 2020, DTSC estimated that necessary response actions to fully
6 remediate the BKK Class I Facility would cost \$869,286.436.

7 842. Plaintiffs have incurred or are committed to incur not less than
8 approximately \$250 million in costs associated with the BKK Class I Facility.

9 843. To date, Defendants have failed to participate in or contribute to any
10 work or costs at the BKK Class I Facility.

11 **FIRST CLAIM FOR RELIEF**

12 **Contribution, CERCLA § 113(f) (42 U.S.C. § 9613(f))**

13 844. Paragraphs 1-843 are incorporated by reference.

14 845. Section 113(f)(1) of CERCLA, 42 U.S.C. § 9613(f)(1), provides in
15 pertinent part:

16 Any person may seek contribution from any other person
17 who is liable or potentially liable under section 9607(a) of
18 this title, during or following any civil action under section
19 9606 of this title or under section 9607 of this title. Such
20 claims shall be brought in accordance with this section and
21 the Federal Rules of Civil Procedure, and shall be governed
22 by Federal law. In resolving contribution claims, the court
23 may allocate response costs among liable parties using
24 such equitable factors as the court determines are
25 appropriate.

22 846. Section 113(f)(3)(B) of CERCLA, 42 U.S.C. § 9613(f)(3)(B),
23 provides in pertinent part:

24 A person who has resolved its liability to the United States
25 or a State for some or all of a response action or for some
26 or all of the costs of such action in an administrative or
27 judicially approved settlement may seek contribution from
28 any person who is not party to a settlement referred to in
paragraph (2) [*i.e.*, “[a] person who has resolved its liability
to the United States or a State in an administrative or
judicially approved settlement”].

1 847. Plaintiffs that are individual members of the BKK Working Group,
2 have been subject to three separate civil actions under CERCLA § 9607: the Initial
3 Site Action, the Second Site Action, and the Third Site Action.

4 848. The First, Second and Third Partial and Amended Third Partial
5 Consent Decrees are judicially-approved settlements that resolve liability of the
6 member Plaintiffs to the State of California for response actions taken at the BKK
7 Class I Facility, and for costs of such response actions.

8 849. The interim settlement agreements entered into between DTSC and
9 certain members of the BKK Working Group were administratively approved and
10 resolved liability of those Plaintiffs to the State of California for response actions
11 taken at the BKK Class I Facility, and for costs of such response actions.

12 850. Defendants are “person[s] who [are] liable or potentially liable under
13 section 9607(a).”

14 851. Defendants have not resolved their liability to the United States or to
15 the State of California in an administrative or judicially approved settlement for
16 response costs arising from the BKK Class I Facility.

17 852. Plaintiffs are entitled to contribution from Defendants under CERCLA
18 § 113(f)(1), 42 U.S.C. § 9613(f)(1), and CERCLA § 113(f)(3)(B), 42 U.S.C.
19 § 9613(f)(3)(B), of an equitable share of all response costs incurred to date as the
20 result of a release or threatened release (within the meaning of CERCLA § 101(22),
21 42 U.S.C. § 9601(22)) of Hazardous Substances at and from the BKK Class I
22 Facility.

23 853. While Defendants are liable for necessary response costs, including
24 site investigation expenses, incurred by Plaintiffs in compliance with the NCP,
25 Defendants have not contributed an equitable share of those costs.

26 854. Defendants are liable for contribution to reimburse Plaintiffs for their
27 respective equitable shares of all costs and liability incurred by Plaintiffs as a result
28

1 of the release or any threatened release of Hazardous Substances at and from the
2 BKK Class I Facility.

3 855. Plaintiffs previously notified the Attorney General of the United
4 States and the Administrator of the United States Environmental Protection Agency
5 pursuant to Section 113(l) of CERCLA, 42 U.S.C. § 9613(l).

6 **SECOND CLAIM FOR RELIEF**

7 **Cost Recovery, CERCLA § 107(a) (42 U.S.C. § 9607(a))**

8 856. Paragraphs 1-855 are incorporated by reference.

9 857. Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), provides in pertinent
10 part:

11 (a) Notwithstanding any other provision or rule of law, and subject
12 only to the defenses set forth in subsection (b) of this section –

13 * * * *

14 (3) any person who by contract, agreement, or otherwise
15 arranged for disposal or treatment, or arranged with a
16 transporter for transport for disposal or treatment of
17 hazardous substances owned or possessed by such person
18 . . . shall be liable for –

19 * * * *

20 (B) any other necessary costs of response incurred by
21 any other person consistent with the national
22 contingency plan

23 858. Plaintiffs are each a “person” within the meaning of CERCLA
24 § 101(21), 42 U.S.C. § 9601(21).

25 859. Defendants are “persons” within the meaning of CERCLA § 101(21),
26 42 U.S.C. § 9601(21).

27 860. The BKK Class I Facility is a “facility” within the meaning of
28 CERCLA § 101(9), 42 U.S.C. § 9601(9).

1 861. Defendants arranged for disposal or treatment, or arranged with third-
2 party transporters for the disposal or treatment, of hazardous substances owned or
3 possessed by Defendants at the BKK Class I Facility.

4 862. Hazardous Substances at the BKK Class I Facility have been released
5 and/or pose a threat of release within the meaning of CERCLA § 101(22), 42
6 U.S.C. § 9601(22).

7 863. Separate from costs incurred by Plaintiffs pursuant to the First, Second
8 and Third Partial and Amended Third Partial Consent Decrees in resolution of
9 Plaintiffs' CERCLA liability to the State of California, Plaintiffs also voluntarily
10 have incurred certain additional response costs as result of a release or threatened
11 release of Hazardous Substances at and from the BKK Class I Facility.

12 864. Such costs include, but are not limited to, the costs of response for
13 installation of certain new equipment at the site, costs of response for the
14 replacement of certain aging equipment at the site necessary to facilitate further
15 cleanup actions, and costs of further site investigations, all of which have been
16 incurred and will continue to be incurred pursuant to CERCLA § 107(a), 42 U.S.C.
17 § 9607(a) and are consistent with the NCP.

18 865. Defendants are liable jointly and severally to Plaintiffs pursuant to
19 CERCLA § 107(a), 42 U.S.C. § 9607(a), for all such necessary response costs,
20 including but not limited to, reasonable attorneys' fees and prejudgment interest,
21 incurred as a result of the release or threatened release of Hazardous Substances at
22 and from the BKK Class I Facility. Such response costs have been incurred and
23 will continue to be incurred consistent with the NCP.

24 **THIRD CLAIM FOR RELIEF**

25 **CERCLA Subrogation, CERCLA § 112(c)(2) (42 U.S.C. § 9612(c))**

26 866. Paragraphs 1-865 are incorporated herein by reference.

27 867. CERCLA § 112(c)(2), 42 U.S.C. § 9612(c)(2), provides in pertinent
28 part:

1 Any person...who pays compensation pursuant to this
2 chapter to any claimant for damages or costs resulting from
3 a release of a hazardous substance shall be subrogated to
4 all rights, claims, and causes of action for such damages
5 and costs of removal that the claimant has under this
6 chapter or any other law.

7 868. Plaintiff Stauffer Management Company LLC has paid the response
8 costs incurred by Bayer CropScience, Inc. relating to the BKK Class I Facility.
9 Plaintiffs Bayer CropScience, Inc. and Stauffer Management Company LLC
10 presented a written claim to Defendants prior to the initiation of this litigation for
11 reimbursement of their fair share of Bayer CropScience Inc.'s past and future
12 response costs incurred at the BKK Class I facility, which Defendants failed to
13 satisfy. Accordingly, pursuant to CERCLA § 112(c)(2), 42 U.S.C. § 9612(c)(2),
14 Stauffer Management Company LLC has paid compensation pursuant to CERCLA
15 to a claimant, Bayer CropScience, Inc., resulting from a release of a hazardous
16 substance, and is therefore subrogated to all rights, claims, and causes of action for
17 such damages and costs of removal that BKK Working Group member Bayer
18 CropScience, Inc. has under this chapter or any other law and seeks Defendants'
19 fair share of costs incurred by Stauffer Management Company LLC through its
20 payments made to satisfy Bayer CropScience's obligations.

21 869. Plaintiff Stauffer Management Company LLC, which has received
22 some reimbursement payments from Syngenta Crop Protection, LLC for costs
23 Stauffer Management Company LLC incurred paying Bayer CropScience Inc.'s
24 obligations for response costs relating to the BKK Class I Facility, has been
25 assigned Syngenta Crop Protection, LLC's rights to subrogation for such payments.
26 Syngenta Crop Protection, LLC's payments were made to Stauffer Management
27 Company LLC, which is a claimant within the meaning of CERCLA § 112(c)(2),
28 42 U.S.C. § 9612(c)(2), for costs resulting from a release of hazardous substances.
Therefore, Stauffer Management Company LLC, through assignment of Syngenta
Crop Protection, LLC's rights, is entitled to recover from Defendants their fair

1 share of those costs incurred by Syngenta Crop Protection, LLC in partially
2 reimbursing Stauffer Management Company LLC for the response costs Stauffer
3 Management Company LLC paid to satisfy the response cost obligations incurred
4 by Bayer CropScience Inc. relating to the BKK Class I Facility.

5 870. Response costs incurred by Plaintiffs that are individual members of
6 the BKK Working Group may have been paid by or reimbursed by a separate
7 entity. Therefore, Plaintiffs presented a written claim to Defendants prior to the
8 initiation of this litigation for reimbursement of their fair share of Plaintiffs' past
9 and future response costs incurred at the BKK Class I facility, which Defendants
10 failed to satisfy. Thus, making them a claimant within the meaning of Section
11 112(c).

12 **FOURTH CLAIM FOR RELIEF**

13 **Declaratory Relief, CERCLA § 113(g)(2) (42 U.S.C. § 9613(g)(2))**

14 871. Paragraphs 1-870 are incorporated herein by reference.

15 872. CERCLA § 113(g)(2), 42 U.S.C. § 9613(g)(2), provides in pertinent
16 part:

17 In any action described in this subsection the court shall
18 enter a declaratory judgment on liability for response costs
19 or damages that will be binding on any subsequent action
or actions to recover further response costs or damages.

20 873. Defendants are jointly and severally liable to Plaintiffs for the
21 reimbursement of necessary response costs, including site investigation expenses,
22 incurred by Plaintiffs consistent with the NCP under CERCLA § 107(a), 42 U.S.C.
23 § 9607(a). Defendants are also severally liable to Plaintiffs under CERCLA §
24 113(f)(1), 42 U.S.C. § 9613(f)(1), and CERCLA § 113(f)(3)(B), 42 U.S.C. §
25 9613(f)(3)(B) for an equitable share of Plaintiffs' response costs incurred pursuant
26 to the First, Second, Third Partial and Amended Third Partial Consent Decrees, and
27 any future consent decrees, as a result of the release or threatened release of
28 Hazardous Substances at and from the BKK Class I Facility. Plaintiffs are

1 therefore entitled to a declaratory judgment pursuant to CERCLA § 113(g)(2), 42
2 U.S.C. § 9613(g)(2) and *Boeing Co. v. Cascade Corp.*, 207 F.3d 1177, 1191 (9th
3 Cir. 2000), binding as to any subsequent action or actions by Plaintiffs, declaring
4 that Defendants are jointly and severally liable to Plaintiffs for reimbursement of
5 their necessary response costs incurred consistent with the NCP under CERCLA
6 § 107(a), 42 U.S.C. § 9607(a), and are also severally liable for an equitable share of
7 Plaintiffs' future responses costs incurred pursuant to the First, Second, Third
8 Partial and Amended Third Partial Consent Decrees, and any future consent
9 decrees, to address the release or threatened release of Hazardous Substances at and
10 from the BKK Class I Facility.

11 **FIFTH CLAIM FOR RELIEF**

12 **Contribution, Hazardous Substance Account Act, California Health and**
13 **Safety Code Sections 78000 et seq.**

14 874. Paragraphs 1-873 are incorporated herein by reference.

15 875. The Plaintiffs bring their claim for contribution against all Defendants
16 except the following: Orange County Sanitation District.

17 876. The Carpenter-Presley-Tanner Hazardous Substance Account Act
18 (“HSAA”), California Health and Safety Code sections 78000 et seq., provides a
19 statutory right of contribution for those parties who clean up contaminated sites
20 from those parties who are responsible for the contamination.

21 877. Section 79670(a) of the HSAA provides that “A person who has
22 incurred response or corrective action costs in accordance with this chapter,
23 Chapter 6.5 (commencing with Section 25100 [sic]) or [CERCLA] may seek
24 contribution or indemnity from any person who is liable pursuant to this chapter.”

25 878. A “liable person” is defined in section 78145(a)(1) of the HSAA as
26 “those persons described in section 107(a) of [CERCLA] (42 U.S.C. Section
27 9607(a)).”
28

1 879. Section 107(a) of CERCLA describes, among others, “any person
2 who... arranged for disposal or treatment” of Hazardous Substances “owned or
3 possessed by such person,” or “any person who accepts or accepted any” Hazardous
4 Substances “for transport to disposal or treatment facilities.”

5 880. Defendants are each a “person” within the meaning of sections 78085
6 and 78145(a)(1) of the Health and Safety Code.

7 881. There have been releases or threatened releases from the BKK Class I
8 Facility.

9 882. As a direct and proximate result of Defendants’ actions that
10 contributed to releases of Hazardous Substances at the BKK Class I Facility,
11 Plaintiffs have incurred response costs, including site investigation costs, in
12 accordance with the HSAA and CERCLA.

13 883. Plaintiffs have given the Director of the Department of Toxic
14 Substances Control notice of the commencement of this action as required by
15 Health and Safety Code section 79670(c).

16 884. Plaintiffs are entitled to contribution or indemnity from Defendants,
17 and each of them, under section 79670 of the Health and Safety Code, for all past,
18 present and future necessary responses costs.

19 **SIXTH CLAIM FOR RELIEF**

20 **Equitable Indemnification**

21 885. Paragraphs 1-884 are incorporated herein by reference.

22 886. Plaintiffs have been required to pay environmental response costs at
23 the BKK Class I Facility.

24 887. The disposal of wastes containing Hazardous Substances at the BKK
25 Class I Facility by Defendants is a substantial factor in causing the environmental
26 conditions present at the BKK Class I Facility.

27 888. A substantial portion of the expenses the Plaintiffs have incurred in
28 response to the actual or threatened release of Hazardous Substances at and from

1 the BKK Class I Facility, including but not limited to investigatory expenses, are
2 the result of the conduct of Defendants.

3 889. As a result, Plaintiffs are entitled to complete or partial indemnity
4 from Defendants for such expenses pursuant to the doctrine of equitable
5 indemnification.

6 **SEVENTH CLAIM FOR RELIEF**

7 **Equitable Contribution**

8 890. Paragraphs 1-889 are incorporated herein by reference.

9 891. Plaintiffs have been required to pay environmental cleanup and other
10 costs at the BKK Class I Facility, and a money judgment has been or will be
11 rendered jointly against Plaintiffs and Defendants.

12 892. Plaintiffs have discharged or will discharge the joint judgment and/or
13 have paid or will pay more than Plaintiffs' equitable pro rata share of the joint
14 judgment.

15 893. As a result, Plaintiffs are entitled to contribution from Defendants for
16 the excess paid over the Plaintiffs' equitable pro rata shares of the joint judgment.

17 **EIGHTH CLAIM FOR RELIEF**

18 **Common Law Subrogation**

19 894. Paragraphs 1-893 are incorporated herein by reference.

20 895. As a direct and proximate result of the actions of Defendants, Plaintiff
21 Stauffer Management Company LLC has incurred and paid amounts, damages,
22 costs, expenses and fees, and may in the future incur additional liabilities through
23 its payments of Bayer CropScience, Inc.'s obligations for response costs relating to
24 the BKK Class I Facility. It is therefore subrogated to all state and federal causes of
25 action Bayer CropScience, Inc. otherwise would have against Defendants.

26 896. Through assignment, Plaintiff Stauffer Management Company LLC
27 has the right to recoup costs incurred by Syngenta Crop Protection, LLC in
28 reimbursing Stauffer Management Company LLC for response costs Stauffer

1 Management Company LLC incurred paying Bayer Crop Science, Inc.’s
2 obligations for response costs relating to the BKK Class I Facility. Based on those
3 reimbursement payments, and to the extent of those payments, Syngenta Crop
4 Protection, LLC is subrogated to all state and federal causes of action Bayer
5 CropScience, Inc. and/or Stauffer Management Company LLC otherwise would
6 have against Defendants.

7 **NINTH CLAIM FOR RELIEF**

8 **Declaratory Relief, CAL. CODE OF CIVIL PROCEDURE § 1060**

9 897. Paragraphs 1-896 are incorporated herein by reference.

10 898. Cal. Code of Civil Procedure § 1060 provides in pertinent part:

11 Any person . . . who desires a declaration of his or her rights
12 or duties with respect to another, or in respect to property .
13 . . may, in a case of actual controversy relating to the legal
14 rights and duties of the respective parties, bring an original
15 action or cross-complaint in the superior court . . . for a
16 declaration of his or her rights and duties in the premises. .
17 . . He or she may ask for a declaration of rights or duties
18 either alone or with other relief; and the court may make a
19 binding declaration of these rights or duties, whether or not
20 further relief is claimed at the time.

21 899. An actual controversy now exists between Plaintiffs and Defendants
22 regarding Defendants’ liability for any and all costs and damages incurred and to be
23 incurred in the future by Plaintiffs arising from the BKK Class I Facility. Plaintiffs
24 contend that Defendants’ liability in this regard is based on CERCLA § § 112, and
25 113, the Hazardous Substances Account Act, California Health and Safety Code §
26 78000 et seq., the common law theory of equitable indemnification, and the
27 common law theory of equitable subrogation (for the indemnitor plaintiffs).

28 900. A declaratory judgment under California Code of Civil Procedure §
1060 for recovery of such costs and damages is appropriate and in the public
interest because: it will prevent the need for multiple lawsuits as the Plaintiffs
continue to incur future costs; it will provide a final resolution of the issues of

1 liability for those costs; and it will insure a prompt and effective response to
2 environmental conditions at the BKK Class I Facility.

3 **JURY TRIAL DEMANDED**

4 901. Plaintiffs demand trial by jury pursuant to Federal Rule of Civil
5 Procedure 38 on all causes and issues so triable under Section 16 of Article I of the
6 California Constitution, the Seventh Amendment to the Constitution, or as may be
7 guaranteed by statute.

8 **PRAYER FOR RELIEF**

9 WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

10 1. Recovery of all costs, cost of abatement, and damages incurred by
11 Plaintiffs, including response costs consistent with the NCP, as a result of any
12 release or threatened release of Hazardous Substances at and from the BKK Class I
13 Facility;

14 2. Contribution of an equitable share of all costs, including response costs
15 incurred by Plaintiffs consistent with the NCP, as a result of any release or
16 threatened release of Hazardous Substances at and from the BKK Class I Facility;

17 3. A declaration binding in any subsequent action or actions brought by
18 Plaintiffs, that Defendants are jointly and severally liable for all future costs
19 Plaintiffs incur as a result of the release or threatened release of Hazardous
20 Substances at and from the BKK Class I Facility, and are severally liable for an
21 equitable share of all future response costs Plaintiffs incur pursuant to the First,
22 Second, Third Partial and Amended Third Partial Consent Decrees, and any future
23 consent decrees, to address the release or threatened release of Hazardous
24 Substances at and from the BKK Class I Facility;

25 4. Indemnification for and/or contribution to all costs, damages and
26 liability, in an amount to be proved at trial, that Plaintiffs have incurred as a result
27 of the release or threatened release of Hazardous Substances at and from the BKK
28 Class I Facility;

1 5. Retention of jurisdiction over this action by this Court after entry of
2 the requested declaratory judgment to grant further relief as may be necessary or
3 proper;

4 6. Attorney’s fees and pre-judgment interest (as response costs); and

5 7. Such other relief as the Court may deem just and appropriate.

6

7 Dated: April 29, 2024

HINSON GRAVELLE & ADAIR LLP

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By s/Douglas A. Gravelle
Douglas A. Gravelle,
Attorneys for Plaintiffs
BKK WORKING GROUP, an
unincorporated association, and
individual members identified
herein

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