



pennsylvania

DEPARTMENT OF ENVIRONMENTAL
PROTECTION

September 24, 2018

CERTIFIED MAIL 7001 2510 0005 9957 8410

Liberty Mutual Holding Co. for
Liberty Mutual Insurance Co.
David Long, Chairman and Chief Executive Officer
175 Berkeley Street
Boston, MA 02116

**RE: Required Submission of Information to Pennsylvania
Department of Environmental Protection for the
Bishop Tube HSCA Site, Malvern, PA.;
Christian Metals Corporation, Insured; Liberty Mutual Ins. Co., Insurer**

Dear Sir or Madam:

The Pennsylvania Department of Environmental Protection ("Department") is seeking information concerning insurance coverage related to the Bishop Tube HSCA Site ("Site"), located at and around the intersection of South Malin Road and Lancaster Avenue in Malvern, Pennsylvania with a mailing address of 1 South Malin Road, Frazer, PA 19355 in East Whiteland Township, Chester County. The Department and other parties have been investigating contamination from hazardous substances at and from the Site for the last several years pursuant to the Department's authority under Chapter 5 of the Pennsylvania Hazardous Sites Cleanup Act ("HSCA"), 35 P.S. §§ 6020.501-6020.513. In 2008, the Department commenced a lawsuit in the United States District Court, Eastern District of Pennsylvania, under HSCA and the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA") against former owners and operators of the Site, and amended its complaint in 2017 to include Christiana Metals Corporation ("Christiana").

The Department is aware that Liberty Mutual Insurance Company or one of its subsidiaries or affiliates (collectively, "Liberty" or "You") issued one or more policies to Christiana, also d/b/a Bishop Tube Company. Please see the attached Certificate of Insurance for your reference. Christiana owned and operated the Site for over twenty-five (25) years. Based upon information and belief, the Department has claimed that Christiana caused the release of trichloroethylene ("TCE") and other hazardous substances into the Site soils, surface water, and groundwater causing contamination of those media.

Sections 503(a) and 503(b) of HSCA, 35 P.S. §§ 6020.503(a) and 503(b), authorizes the Department to require Liberty to furnish all information and documents in its possession, custody, or control, or in the possession, custody, or control of any of Liberty's employees or agents, that concern, refer, or relate to the ability of a person to pay for or perform an environmental cleanup under HSCA. The Department requests that you send all such

September 24, 2018

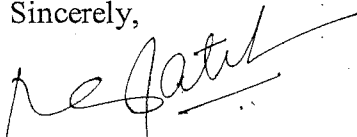
information and documents related to the insurance of Christiana by Liberty or any other insurance carrier that could pertain to Christina's ownership or operation of its business at the Site from 1974 to the present.

The above-requested information should be sent directly to Dustin Armstrong, Environmental Protection Specialist, Environmental Cleanup and Brownfields Program, Hazardous Sites Cleanup Section, at the above address, within thirty (30) calendar days of receipt of this letter.

This letter, issued under the Department's authority to obtain information, is neither a final action nor an order, and gives you no right of appeal. If you do not provide the requested information, however, the Department has the authority to issue an order against you or to take other appropriate legal action. Any destruction or alteration of the documents requested in this letter may subject you to criminal penalties under Section 1105(c) of the Hazardous Sites Cleanup Act, 35 P.S. § 6021.1105(c).

If you have any questions regarding the above, please contact Dustin Armstrong at 484.250.5723 and darmstrong@pa.gov or Supervisory Counsel Adam Bram, Esq. at 484.250.5930 or abram@pa.gov.

Sincerely,



Ragesh R. Patel
Regional Manager
Environmental Cleanup and Brownfields

Enclosure: Liberty Mutual Certificate of Insurance (4-10-86)

cc: Dustin Armstrong, Environmental Protection Specialist (electronic mail only)
Bonnie McClennen, HSCA Supervisor (electronic mail only)
Adam Bram, Esq., Supervisory Counsel (electronic mail only)
Anderson Lee Hartzell, Esq., Regional Chief Counsel (electronic mail only)
Mica Iddings, Esq., Assistant Counsel (electronic mail only)

Certificate of Insurance

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON YOU THE CERTIFICATE HOLDER. THIS CERTIFICATE IS NOT AN INSURANCE POLICY AND DOES NOT AMEND, EXTEND, OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

This is to Certify that

Christiana Metals Corp.
T/A Bishop Tube Company
Malin Rd.

Name and address of Insured.

LIBERTY MUTUAL



LIBERTY MUTUAL INSURANCE COMPANY - LIBERTY MUTUAL FIRE INSURANCE COMPANY
LIBERTY INSURANCE CORPORATION - BOSTON, MA

Frazer, PA 19355

is, at the issue date of this certificate, insured by the Company under the policy(ies) listed below. *The insurance afforded by the listed policy(ies) is subject to all their terms, exclusions and conditions and is not altered by any requirement, term or condition of any contract or other document with respect to which this certificate may be issued.

TYPE OF POLICY		CERT. EXP. DATE	POLICY NUMBER	LIMITS OF LIABILITY	
WORKERS' COMPENSATION		1-7-87	WC7-131-072169-076	COVERAGE AFFORDED UNDER W.C. LAW OF THE FOLLOWING STATES: PA COV. B BODILY INJURY BY ACCIDENT \$ 100,000. EA. ACCIDENT BODILY INJURY BY DISEASE \$ 100,000. EA. PERSON BODILY INJURY BY DISEASE \$ 500,000. POLICY LIMIT	
GENERAL LIABILITY	<input checked="" type="checkbox"/> COMPREHENSIVE FORM <input type="checkbox"/> SCHEDULE FORM	1-7-87	LG1-131-072169-026	BODILY INJURY	
	<input checked="" type="checkbox"/> PRODUCTS COMPLETED OPERATIONS			\$ 500,000. EACH OCCURRENCE	\$ 250,000. EACH OCCURRENCE
	<input checked="" type="checkbox"/> INDEPENDENT CONTRACTORS/CONTRACTORS PROTECTIVE			\$ 500,000. AGGREGATE	\$ 250,000. AGGREGATE
<input checked="" type="checkbox"/> CONTRACTUAL LIABILITY <input type="checkbox"/>				COMBINED SINGLE LIMIT BODILY INJURY AND PROPERTY DAMAGE \$ EACH OCCURRENCE \$ AGGREGATE	
AUTO LIABILITY	<input checked="" type="checkbox"/> OWNED <input checked="" type="checkbox"/> NON-OWNED <input checked="" type="checkbox"/> HIRED	1-7-87	AS1-131-072169-036	\$ 1,000,000. EACH ACCIDENT-SINGLE LIMIT-B.I. AND P.D. COMBINED \$ EACH PERSON EACH ACCIDENT OR OCCURRENCE \$ EACH ACCIDENT OR OCCURRENCE	
OTHER	Umbrella Excess Liability	1-7-87	LE1-131-072169-046	\$5,000,000. Single Limit for Bodily Injury and Property Damage over Underlying Limits,	
LOCATION(S) OF OPERATIONS & JOB # (if Applicable)			DESCRIPTION OF OPERATIONS:		
All Locations					

*NOTE: You will NOT be notified annually of the continuation of this coverage. You will be notified if this coverage is terminated or reduced.

NOTICE OF CANCELLATION: THE COMPANY WILL NOT TERMINATE OR REDUCE THE INSURANCE AFFORDED UNDER THE ABOVE POLICIES UNLESS none DAYS NOTICE OF SUCH TERMINATION OR REDUCTION HAS BEEN MAILED TO:

Issued as Evidence of Coverage

CERTIFICATE HOLDER →

Lemari S. Felicini
AUTHORIZED REPRESENTATIVE

4-10-86 Bala Cynwyd, PA 19004

DATE ISSUED

OFFICE

This certificate is executed by LIBERTY MUTUAL INSURANCE COMPANY as respects such insurance as is afforded by That Company, it is executed by LIBERTY MUTUAL FIRE INSURANCE COMPANY as respects such insurance as is afforded by That Company, it is executed by LIBERTY INSURANCE CORPORATION as respects such insurance as is afforded by That Company.

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

0178 2566 5000 0152 7002

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Sent To Liberty Mutual Holding, David Long
Street, Apt. No.,
or PO Box No. 175 Berkley St
City, State, ZIP+4 Boston MA 02116

PS Form 3800, January 2001

See Reverse for Instructions