UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5
422919

REPLY TO THE ATTENTION OF:

DEC 1 2 2011

SE-5J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. Dry Cleaning Corporation
c/o Robert Y. Lee, President
USDC Tuchman Indiana, Inc.
4040 MacArthur Boulevard, Suite 305
Newport Beach, California 92260

Re: Request for Information Pursuant to Section 104 of CERCLA for
Tuchman Cleaners Site in Indianapolis, Indiana
Site Spill Identification Number: B5ZU

Dear Mr. Lee:

This letter seeks your cooperation in providing information and documents relating to the contamination of the Tuchman Cleaners Superfund Site in Indianapolis, Indiana (Site). We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to this Information Request and enclosed questions (Enclosure B) within fourteen (14) calendar days of your receipt of this letter.

The United States Environmental Protection Agency (EPA) is investigating the release or threat of release of hazardous substances, pollutants or contaminants at the Site. EPA is seeking to obtain information concerning the generation, storage, treatment, transportation and methods used to dispose of these substances, and identify activities, materials and parties that contributed to contamination at the Site. EPA will study the effects of these substances on the environment and public health. EPA believes that you might possess information, which may assist the Agency in its investigation of the Site.

Under Section 104(e)(2) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, (CERCLA), 42 U.S.C. § 9604(e)(2), EPA has broad information gathering authority, which allows EPA to require persons to furnish information or documents relating to:

(A) The identification, nature and quantity of materials which have been or are generated, treated, stored or disposed of at a vessel or facility or transported to a vessel or facility.

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(B) The nature or extent of a release or threatened release of a hazardous substance or pollutant or contaminant at or from a vessel or facility.

(C) Information relating to the ability of a person to pay for or to perform a cleanup.

While EPA seeks your cooperation in this investigation, compliance with the Information Request is required by law. In addition, providing false, fictitious or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Some of the information EPA is requesting may be considered by you to be confidential. Please be aware that you may not withhold the information upon that basis. If you wish EPA to treat the information confidentially, you must advise EPA of that fact by following the procedures outlined in Enclosure A, including the requirement for supporting your claim for confidentiality.

If you have information about other parties who may have information, which may assist the Agency in its investigation of the Site or may be responsible for the contamination at the Site, that information should be submitted within the time frame noted above.

Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes EPA to pursue penalties for failure to comply with that section or for failure to respond adequately to requests for submissions of required information.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1995, 44 U.S.C. § 3501 *et seq.*

Instructions on how to respond to the questions in Enclosure B to this document are described in Enclosure A. Your response to this Information Request should be mailed to:

Cheryl McIntyre
U.S. Environmental Protection Agency
Enforcement Services Section 1, SE-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

If you have additional questions about the history of the Site, the nature of the environmental conditions at the Site or the status of cleanup activities, please contact Shelly Lam at 317-308-3073. However, if you have specific questions about the Information Request, please contact Cheryl McIntyre at 312-886-1964.

We appreciate and look forward to your prompt response to this Information Request.

Sincerely,

Sharon Jaffess, Chief
Enforcement and Compliance Assurance Branch

Enclosures

Enclosure A
Information Request
to U.S. Dry Cleaning Corporation

Instructions

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this Information Request. For each question contained in this letter, if information responsive to this Information Request is not in your possession, custody or control, please identify the person(s) from whom such information may be obtained.

2. Number Each Answer. Precede each answer with the corresponding number of the question and the subpart to which it responds.

3. Provide the Best Information Available. Provide responses to the best of your ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to you will be considered non-compliance with this Information Request.

4. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.

5. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to Section 104(e) of CERCLA that you supplement your response to EPA.

6. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42.U.S.C. §§ 9604(e)(7)(E) and (F), and Section 3007(b) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6927(b), and 40 C.F.R. § 2.203(b).

If you make a claim of confidentiality for any of the information, you submit to EPA, you must prove that claim. For each document or response you claim confidential, you must separately address the following points:

a) the portions of the information alleged to be entitled to confidential treatment;

b) the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event or permanently);

c) measures taken by you to guard against the undesired disclosure of the information to others;

d) the extent to which the information has been disclosed to others and the precautions taken in connection therewith;

e) pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and

f) whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp or type "confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents, is in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA's verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so, and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by Section 104(e) of CERCLA. If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.

7. Disclosure to EPA Contractor. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. § 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA may disclose all responses to this Information Request to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) calendar days of receiving this Information Request.

8. Personal Privacy Information. Personnel and medical files, and similar files, the disclosure of which to the general public may constitute an invasion of privacy, should be segregated from your responses, included on separate sheet(s) and marked as "Personal Privacy Information."

9. Objections to Questions. If you have objections to some or all the questions within the Information Request letter, you are still required to respond to each of the questions.

Definitions

The following definitions shall apply to the following words as they appear in this Information Request.

1. The term "**arrangement**" means every separate contract or other agreement between two or more persons, whether written or oral.

2. The term "**documents**" includes any written, recorded, computer-generated or visually or aurally reproduced material of any kind in any medium in your possession, custody or control, or known by you to exist, including originals, all prior drafts and all non-identical copies.

3. The term "**hazardous substance**" shall have the same definition as that contained in Section 101(14) of CERCLA, 42 U.S.C. §9601(14), and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.

4. The term "**identify**" means, with respect to a natural person, to set forth: (a) the person's full name; (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with title, position or business.

5. With respect to a corporation, partnership or other business entity (including a sole proprietorship), the term "**identify**" means to provide its full name, address and affiliation with the individual and/or company to whom/which this request is addressed.

6. The term "**material**" or "**materials**" shall mean any and all objects, goods, substances or matter of any kind, including but not limited to wastes.

7. The term "**person**" shall include any individual, firm, unincorporated association, partnership, corporation, trust or other entity.

8. The term "**pollutant or contaminant**" shall include, but not be limited to, any element, substance, compound or mixture, including disease-causing agents, which after release into the environment will or may reasonably be anticipated to cause death, disease, behavioral abnormalities, cancer, genetic mutation, physiological malfunctions (including malfunctions in reproduction) or physical deformations; except that the term "pollutant or contaminant" shall not include petroleum.

9. The term "**real estate**" shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

10. The term "**release**" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.

11. The term "**Site**" or "**Facility**" shall mean the Tuchman Cleaners Superfund Site located at 4401 North Keystone, Indianapolis, Indiana.

12. The term "**waste**" or "**wastes**" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances and pollutants or contaminants, whether solid, liquid or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

13. The term "**you**" or "**Respondent**" shall mean USDC Tuchman Indiana, Inc. or U.S. Dry Cleaning Corporation.

Enclosure B
Requests

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

2. Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

4. List any EPA Identification Numbers of the Respondent.

5. Identify the acts or omissions of any persons, other than your employees, contractors or agents that may have caused the release or threat of release of hazardous substances, pollutants or contaminants from or at the Site, and damages resulting therefrom.

6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances by you, your contractors or by prior owners and/or operators at the Site.

7. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials at the Site? If the answer to the preceding question is anything but an unqualified "no", identify:

a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;

b) Who supplied you with such hazardous substances;

c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;

d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;

e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and

f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.

8. Provide a list of all property and casualty insurance (e.g., comprehensive general liability, environmental impairment, etc.) and specify the insurer, policy, effective dates and per occurrence policy limits for each policy for the time period when you owned or operated the Site. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

9. Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last three years.

10. If Respondent is a Corporation, provide a copy of the Articles of Incorporation and By-Laws.

11. If Respondent is a Partnership, provide copies of the Partnership Agreement.

12. If Respondent is a Trust, provide all relevant agreements and documents to support this claim.

13. Describe the nature of your activities or business at the Site, with respect to purchasing, receiving, processing, storing, treating, disposing or otherwise handling hazardous substances or materials at the Site.

14. State the dates during which you owned, operated or leased the Site and provide copies of all documents evidencing or relating to such ownership, operation or lease **arrangement** (e.g., deeds, leases, etc.).

15. Provide information about the Site, including but not limited to the following:

a) Property boundaries, including a written legal description;

b) Location of underground utilities (telephone, electrical, sewer, water main, etc.);

c) Surface structures (e.g., buildings, tanks, etc.);

d) Ground water wells, including drilling logs;

e) Stormwater drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s) and other underground structures; and where, when and how such systems are emptied;

f) Any and all additions, demolitions or changes of any kind on, under or about the Site, to its physical structures or to the property itself (e.g., excavation work); and any planned additions, demolitions or other changes to the Site; and

g) All maps and drawings of the Site in your possession.

16. Identify all past and present solid waste units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on the Site. For each such solid waste unit identified, provide the following information:

a) A map showing the unit's boundaries and the location of all known solid waste units whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;

b) The type of unit (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit;

c) The dates that the unit was in use;

d) The purpose and past usage (e.g., storage, spill containment, etc.);

e) The quantity and types of materials (hazardous substances and any other chemicals) located in each unit; and

f) The construction (materials, composition), volume, size, dates of cleaning and condition of each unit.

g) If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

17. Identify the prior owners of the Site. For each prior owner, further identify:

a) The dates of ownership;

b) All evidence showing that they controlled access to the Site; and

c) All evidence that a hazardous substance, pollutant or contaminant, was released or threatened to be released at the Site during the period that they owned the Site.

18. Identify the prior operators, including lessors, of the Site. For each such operator or lessor, further identify:

a) The dates of operation;

b) The nature of prior operations at the Site;

c) All evidence that they controlled access to the Site; and

d) All evidence that a hazardous substance, pollutant or contaminant was released or threatened to be released at or from the Site and/or its solid waste units during the period that they were operating the Site.

19. Provide copies of all local, state and federal environmental permits ever granted for the Site or any part thereof (e.g., Resource Conservation and Recovery Act (RCRA) permits, National Pollutant Discharge Elimination System permits, etc.).

20. Did the Site ever have "interim status" under RCRA? If so, and the Site does not currently have interim status, describe the circumstances under which the Site lost interim status.

21.Was a notification of hazardous waste activity under RCRA ever filed for the Site? If so, provide a copy of such notification.

22. Provide all reports, information or data related to soil, water (ground and surface) or air quality and geology/hydrogeology at and about the Site. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

23. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology or air quality on or about the Site? If so, identify:

a) What the nature and scope of these investigations will be;

b) The contractors or other persons that will undertake these investigations;

c) The purpose of the investigations;

d) The dates when such investigations will take place and be completed; and

e) Where on the Site such investigations will take place.

24. Identify all leaks, spills or releases into the environment of any hazardous substances, pollutants or contaminants that have occurred at or from the Site. In addition, identify:

a) When such releases occurred;

b) How the releases occurred;

c) The amount of each hazardous substances, pollutants or contaminants so released;

d) Where such releases occurred;

e) Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release.

f) Any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken; and

g) All persons with information relating to these releases.

25. Was there ever a spill, leak, release or discharge of hazardous materials into any subsurface disposal system or floor drain inside or under the building? If the answer to the preceding question is anything but an unqualified "no," identify:

a) Where the disposal system or floor drains were located;

b) When the disposal system or floor drains were installed;

c) Whether the disposal system or floor drains were connected to pipes;

d) Where such pipes were located and emptied;

e) When such pipes were installed;

f) How and when such pipes were replaced, or repaired; and

g) Whether such pipes ever leaked or in any way released hazardous materials into the environment.

26. Did any leaks, spills or releases of hazardous materials occur on the Site when such materials were being:

a) Delivered by a vendor;

b) Stored (e.g., in any tanks, drums or barrels);

c) Transported or transferred (e.g., to or from any tanks, drums, barrels or recovery units); or

d) Treated.

27. Has soil ever been excavated or removed from the Site? Unless the answer to the preceding question is anything besides an unequivocal "no," identify:

a) Amount of soil excavated;

b) Location of excavation:

c) Manner and place of disposal and/or storage of excavated soil;

d) Dates of soil excavation;

e) Identity of persons who excavated or removed the soil;

f) Reason for soil excavation;

g) Whether the excavation or removed soil contained hazardous materials and why the soil contained such materials;

h) All analyses or tests and results of analyses of the soil that was removed from the Site; and

i) All persons, including contractors, with information about (a) through (h) of this request.

28. Describe the relationship (business, legal and in any other practical or professional way) among USDC Tuchman Indiana, Inc., U.S. Dry Cleaning Corporation, National Dry Cleaners and Delia's Cleaners.

29. Was there any purchase agreements, asset or otherwise, whereby some or all of the assets of the Respondent were sold? If so, identify:

a) the date(s);

b) the companies involved;

c) the terms of such purchase agreements; and

d) provide copies of all documents regarding the purchase agreement.

30. If Respondent is a subsidiary of another corporation, identify such other corporation and State the dates during which the parent/subsidiary relationship began and the names and addresses of that corporation's president, chairman of the board and other officers.

31. Identify any successor corporations or other entities of the Respondent.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

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CERTIFIED MAIL
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U.S. Dry Cleaning Corporation
c/o Robert Y. Lee, President
USDC Tuchman Indiana, Inc.
4040 MacArthur Boulevard, Suite 305
Newport Beach, California 92260

Re: Request for Information Pursuant to Section 104 of CERCLA for
Tuchman Cleaners Site in Indianapolis, Indiana
Site Spill Identification Number: B5ZU

Dear Mr. Lee:

This letter seeks your cooperation in providing information and documents relating to the contamination of the Tuchman Cleaners Superfund Site in Indianapolis, Indiana (Site). We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to this Information Request and enclosed questions (Enclosure B) within fourteen (14) calendar days of your receipt of this letter.

The United States Environmental Protection Agency (EPA) is investigating the release or threat of release of hazardous substances, pollutants or contaminants at the Site. EPA is seeking to obtain information concerning the generation, storage, treatment, transportation and methods used to dispose of these substances, and identify activities, materials and parties that contributed to contamination at the Site. EPA will study the effects of these substances on the environment and public health. EPA believes that you might possess information, which may assist the Agency in its investigation of the Site.

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Enforcement Services Section 1, SE-5J
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Sincerely,

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10. The term "**release**" shall mean any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping or disposing into the environment, including the abandonment or discharging of barrels, containers and other closed receptacles containing any hazardous substance or pollutant or contaminant.

11. The term "**Site**" or "**Facility**" shall mean the Tuchman Cleaners Superfund Site located at 4401 North Keystone, Indianapolis, Indiana.

12. The term "**waste**" or "**wastes**" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances and pollutants or contaminants, whether solid, liquid or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

13. The term "**you**" or "**Respondent**" shall mean USDC Tuchman Indiana, Inc. or U.S. Dry Cleaning Corporation.

b) Location of excavation:

c) Manner and place of disposal and/or storage of excavated soil;

d) Dates of soil excavation;

e) Identity of persons who excavated or removed the soil;

f) Reason for soil excavation;

g) Whether the excavation or removed soil contained hazardous materials and why the soil contained such materials;

h) All analyses or tests and results of analyses of the soil that was removed from the Site; and

i) All persons, including contractors, with information about (a) through (h) of this request.

28. Describe the relationship (business, legal and in any other practical or professional way) among USDC Tuchman Indiana, Inc., U.S. Dry Cleaning Corporation, National Dry Cleaners and Delia's Cleaners.

29. Was there any purchase agreements, asset or otherwise, whereby some or all of the assets of the Respondent were sold? If so, identify:

a) the date(s);

b) the companies involved;

c) the terms of such purchase agreements; and

d) provide copies of all documents regarding the purchase agreement.

30. If Respondent is a subsidiary of another corporation, identify such other corporation and State the dates during which the parent/subsidiary relationship began and the names and addresses of that corporation's president, chairman of the board and other officers.

31. Identify any successor corporations or other entities of the Respondent.

e) Any and all activities undertaken in response to each such release or threatened release, including the notification of any agencies or governmental units about the release.

f) Any and all investigations of the circumstances, nature, extent or location of each release or threatened release including, the results of any soil, water (ground and surface) or air testing undertaken; and

g) All persons with information relating to these releases.

25. Was there ever a spill, leak, release or discharge of hazardous materials into any subsurface disposal system or floor drain inside or under the building? If the answer to the preceding question is anything but an unqualified "no," identify:

a) Where the disposal system or floor drains were located;

b) When the disposal system or floor drains were installed;

c) Whether the disposal system or floor drains were connected to pipes;

d) Where such pipes were located and emptied;

e) When such pipes were installed;

f) How and when such pipes were replaced, or repaired; and

g) Whether such pipes ever leaked or in any way released hazardous materials into the environment.

26. Did any leaks, spills or releases of hazardous materials occur on the Site when such materials were being:

a) Delivered by a vendor;

b) Stored (e.g., in any tanks, drums or barrels);

c) Transported or transferred (e.g., to or from any tanks, drums, barrels or recovery units); or

d) Treated.

27. Has soil ever been excavated or removed from the Site? Unless the answer to the preceding question is anything besides an unequivocal "no," identify:

a) Amount of soil excavated;

d) All evidence that a hazardous substance, pollutant or contaminant was released or threatened to be released at or from the Site and/or its solid waste units during the period that they were operating the Site.

19. Provide copies of all local, state and federal environmental permits ever granted for the Site or any part thereof (e.g., Resource Conservation and Recovery Act (RCRA) permits, National Pollutant Discharge Elimination System permits, etc.).

20. Did the Site ever have "interim status" under RCRA? If so, and the Site does not currently have interim status, describe the circumstances under which the Site lost interim status.

21.Was a notification of hazardous waste activity under RCRA ever filed for the Site? If so, provide a copy of such notification.

22. Provide all reports, information or data related to soil, water (ground and surface) or air quality and geology/hydrogeology at and about the Site. Provide copies of all documents containing such data and information, including both past and current aerial photographs as well as documents containing analysis or interpretation of such data.

23. Are you or your consultants planning to perform any investigations of the soil, water (ground or surface), geology, hydrology or air quality on or about the Site? If so, identify:

a) What the nature and scope of these investigations will be;

b) The contractors or other persons that will undertake these investigations;

c) The purpose of the investigations;

d) The dates when such investigations will take place and be completed; and

e) Where on the Site such investigations will take place.

24. Identify all leaks, spills or releases into the environment of any hazardous substances, pollutants or contaminants that have occurred at or from the Site. In addition, identify:

a) When such releases occurred;

b) How the releases occurred;

c) The amount of each hazardous substances, pollutants or contaminants so released;

d) Where such releases occurred;

16. Identify all past and present solid waste units (e.g., waste piles, landfills, surface impoundments, waste lagoons, waste ponds or pits, tanks, container storage areas, etc.) on the Site. For each such solid waste unit identified, provide the following information:

a) A map showing the unit's boundaries and the location of all known solid waste units whether currently in operation or not. This map should be drawn to scale, if possible, and clearly indicate the location and size of all past and present units;

b) The type of unit (e.g., storage area, landfill, waste pile, etc.), and the dimensions of the unit;

c) The dates that the unit was in use;

d) The purpose and past usage (e.g., storage, spill containment, etc.);

e) The quantity and types of materials (hazardous substances and any other chemicals) located in each unit; and

f) The construction (materials, composition), volume, size, dates of cleaning and condition of each unit.

g) If unit is no longer in use, how was such unit closed and what actions were taken to prevent or address potential or actual releases of waste constituents from the unit.

17. Identify the prior owners of the Site. For each prior owner, further identify:

a) The dates of ownership;

b) All evidence showing that they controlled access to the Site; and

c) All evidence that a hazardous substance, pollutant or contaminant, was released or threatened to be released at the Site during the period that they owned the Site.

18. Identify the prior operators, including lessors, of the Site. For each such operator or lessor, further identify:

a) The dates of operation;

b) The nature of prior operations at the Site;

c) All evidence that they controlled access to the Site; and

8. Provide a list of all property and casualty insurance (e.g., comprehensive general liability, environmental impairment, etc.) and specify the insurer, policy, effective dates and per occurrence policy limits for each policy for the time period when you owned or operated the Site. In lieu of providing this information, you may submit complete copies of all relevant insurance policies.

9. Provide copies of all income tax returns sent to the Federal Internal Revenue Service in the last three years.

10. If Respondent is a Corporation, provide a copy of the Articles of Incorporation and By-Laws.

11. If Respondent is a Partnership, provide copies of the Partnership Agreement.

12. If Respondent is a Trust, provide all relevant agreements and documents to support this claim.

13. Describe the nature of your activities or business at the Site, with respect to purchasing, receiving, processing, storing, treating, disposing or otherwise handling hazardous substances or materials at the Site.

14. State the dates during which you owned, operated or leased the Site and provide copies of all documents evidencing or relating to such ownership, operation or lease **arrangement** (e.g., deeds, leases, etc.).

15. Provide information about the Site, including but not limited to the following:

a) Property boundaries, including a written legal description;

b) Location of underground utilities (telephone, electrical, sewer, water main, etc.);

c) Surface structures (e.g., buildings, tanks, etc.);

d) Ground water wells, including drilling logs;

e) Stormwater drainage system, and sanitary sewer system, past and present, including septic tank(s), subsurface disposal field(s) and other underground structures; and where, when and how such systems are emptied;

f) Any and all additions, demolitions or changes of any kind on, under or about the Site, to its physical structures or to the property itself (e.g., excavation work); and any planned additions, demolitions or other changes to the Site; and

g) All maps and drawings of the Site in your possession.

Enclosure B
Requests

1. Identify all persons consulted in the preparation of the answers to these Information Requests.

2. Identify all documents consulted, examined or referred to in the preparation of the answers to these Requests, and provide copies of all such documents.

3. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any Information Request or who may be able to provide additional responsive documents, identify such persons.

4. List any EPA Identification Numbers of the Respondent.

5. Identify the acts or omissions of any persons, other than your employees, contractors or agents that may have caused the release or threat of release of hazardous substances, pollutants or contaminants from or at the Site, and damages resulting therefrom.

6. Identify all persons having knowledge or information about the generation, transportation, treatment, disposal or other handling of hazardous substances by you, your contractors or by prior owners and/or operators at the Site.

7. Did you ever use, purchase, store, treat, dispose, transport or otherwise handle any hazardous substances or materials at the Site? If the answer to the preceding question is anything but an unqualified "no", identify:

a) The chemical composition, characteristics, physical state (e.g., solid, liquid) of each hazardous substance;

b) Who supplied you with such hazardous substances;

c) How such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;

d) When such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you;

e) Where such hazardous substances were used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you; and

f) The quantity of such hazardous substances used, purchased, generated, stored, treated, transported, disposed or otherwise handled by you.