UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

JAN 21 2016

PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

G-I Holdings Inc.
1 Campus Drive
Parsippany, New Jersey 07054
Attn: Daniel J. Goldstein
Sr. Vice President and Gen. Counsel

Re: Request for Information Pursuant to Section 104 of CERCLA
LCP Chemicals, Inc. Superfund Site, Linden, New Jersey

Dear Sir:

The United States Environmental Protection Agency ("EPA") is charged with responding to the release or threatened release of hazardous substances, pollutants, and contaminants into the environment and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, ("CERCLA"), 42 U.S.C. § 9601 et seq. (also known as the "Superfund" law). For your information, a copy of the Superfund law may be found at **www.epa.gov/superfund/action/law/index.htm.**

This letter seeks your cooperation in providing information and documents relating to the **LCP Chemicals, Inc. Superfund Site (the "Site")** located at the foot of South Wood Avenue, Linden, Union County, New Jersey. EPA encourages you to give this letter your immediate attention. A complete and truthful response should be provided to the attached Request for Information **within 30 days** of your receipt of this letter.

EPA has documented the release and threatened release of hazardous substances into the environment at the Site. A Record of Decision ("ROD") selecting the remedial action for the Site was issued in February 2014. A copy of the ROD may be found in the administrative record repositories maintained at the EPA Region 2 office (290 Broadway, New York, New York 10007) and the Linden Public Library, (31 East Henry Street, Linden, NJ).

Under Section 104(e)(2) of CERCLA, 42 U.S.C. Section 9604(e)(2), EPA has broad information gathering authority which allows EPA to require persons to provide information or documents relating to materials generated, treated, stored,

or disposed of at or transported to a facility; the nature or extent of a release of a hazardous substance, or pollutant, or contaminant at or from a facility; and the ability of a person to pay for or perform a cleanup.

While EPA seeks your cooperation in this investigation, compliance with the Request for Information is required by law. When you have prepared your response to the Request for Information, please sign the enclosed "Certification of Answers to Request for Information," and return that Certification to EPA along with your response. Please note that false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under federal law. In addition, Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes EPA to pursue penalties for failure to comply with a Request for Information.

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 described in the Instructions section which follows this letter, including the requirement for supporting your claim for confidentiality.

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

Please note that if after submitting your response you obtain additional or different information concerning the matters addressed by our Request for Information, it is necessary that you promptly notify EPA. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

See the enclosed Instructions for information on how to respond to the enclosed questions and/or information requests. Your response to this Request for Information should be mailed to:

Jonathan Gorin
Emergency and Remedial Response Division
U.S. Environmental Protection Agency, Region 2
290 Broadway, 19th Floor
New York, New York 10007

A copy of your reply should be sent to:

Frank Cardiello, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, New York 10007

If you have any questions regarding this Request for Information, or would like to discuss this matter with EPA, please contact Mr. Gorin at (212) 637-4361. Inquiries from attorneys should be addressed to Mr. Cardiello at (212) 637-3148.

We appreciate and look forward to your prompt response to this matter.

Sincerely yours,

Nicoletta DiForte

Nicoletta DiForte
Deputy Director of Enforcement
Emergency and Remedial Response Division

cc. Dennis J. O'Grady, Riker, Danzig, Scherer, Hyland & Perretti
Frank Cardiello, USEPA
Jonathan Gorin, USEPA
Thomas Carroll, USDOJ

INSTRUCTIONS FOR RESPONDING TO REQUEST FOR INFORMATION

A. Directions

1. A complete and separate response should be given for each question. For each question contained in this letter, if information or documents responsive to this information request are not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.

2. Identify each answer with the number of the question and the subpart to which it responds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the question to which it applies.

3. 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. Consult with all present and past employees and agents of the Company whom you have reason to believe may be familiar with the matter to which the question pertains.

4. In answering each question, identify each individual and any other source of information (including documents) that were consulted in the preparation of the response to the question.

5. If additional information or documents responsive to this Request becomes known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that the Company supplement its response to EPA within 30 days from the date such information or documents became available to it.

6. If you have reason to believe that an individual other than one employed by the Company may be able to provide additional details or documentation in response to any question, state that person's name, last known address, phone number and the reasons for your belief.

7. If a document is requested but not available, state the reason for its unavailability. To the best of your ability, identify the document by author, date, subject matter, number of pages and all recipients of the documents with their addresses.

8. If anything is omitted from a document produced in response to the Request for Information, state the reason for, and the subject matter of, the omission.

9. If you cannot provide a precise answer to a question, please approximate but, in any such instance, state the reason for your inability to be specific.

10. Whenever this Request for Information requests the identification of a natural person, or other entity, the person or entity's full name and present or last known address also should be provided.

11. Confidential Information. The information requested herein must be provided even though the Company may contend that it includes confidential information or trade secrets. The Company 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), Section 3007 (b) of RCRA, 42 U.S.C. § 6927(b), and 40 C.F.R. § 2.203(b).

If you make a claim of confidentially for any of the information the Company submits to EPA, the Company must prove that claim. For each document or response the Company claims is confidential, the Company 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 the Company 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 the Company asserts 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 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 nonconfidential 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 are in one envelope and all materials for which you desire confidential treatment are in another envelope. All confidentiality claims are subject to EPA verification. It is important that the Company satisfactorily show that it has taken reasonable measures to protect the confidentiality of the information and that it intends to continue to do so, and that it is not and has not been obtainable by legitimate means without the Company's consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by CERCLA Section 104(e). 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 the Company.

12. Disclosure to EPA Contractor. Information which you submit in response to this Request for Information may be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. Part 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Request for Information to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Request for Information. 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) days of receiving this Request for Information.

13. 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."

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

B. DEFINITIONS

1. The term "by-product" means any secondary or incidental product generated as a consequence of an industrial or manufacturing process, and is not the primary product or service being produced. A by-product can be useful

and marketable, or it can be considered waste.

2. The term "you," "your" or "Company" shall mean the company to which this Request for Information is addressed and any divisions, branches, officers, managers, employees, contractors, assigns or agents.

3. The term "document" and "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.

4. The term "G-I Holdings Inc." means G-I Holdings Inc. as the corporate successor to all companies previously known as GAF Corporation, G-I, G Industries, GAF Fiberglass Corp., GAF Chemicals Corp. and GAF Building Materials Corp.

5. The term "hazardous substances" 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, products or other nonhazardous substances.

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

7. With respect to a corporation, partnership, business trust or other association or 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/with this request is addressed.

8. The term "industrial waste" shall mean any solid, liquid or sludge or any mixture thereof which possesses any of the following characteristics:

a. it contains one or more hazardous substances (at any concentration) as defined in 42 U.S.C. § 9601(14);
b. it is a "hazardous waste" as defined in 42 U.S.C. § 6903(5);
c. it is an industrial waste product;
d. it is "slag" containing metal waste;
e. it is an industrial treatment plant sludge or supernatant;
f. it is an industrial by-product;
g. it is coolant water or blowdown waste from a coolant system;
h. it is a spent product which could be reused after rehabilitation; or,
i. it is any material which you have reason to believe would be toxic if

either ingested, inhaled or placed in contact with your skin.

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

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

11. The term “record” or “records” shall mean any tangible item or electronic storage medium on which information of any type is placed. The term includes any paper document, digital record, photograph, business record, contract, E-mail and all other items on which information of any type is stored or recorded.

12. The term “GAF Linden Site” means the property known as the GAF Chemicals Site located in the Tremley Point section of Linden, New Jersey off of South Wood Avenue, and designated as Block 587, Lots 1, 2.01 and 2.02 on the tax map of Linden, Union County, New Jersey.

13. The term “LCP Linden Site” means the property known as the LCP Chemicals, Inc. Superfund Site located in the Tremley Point section of Linden, New Jersey off of South Wood Avenue, and designated as Block 587, Lots 3.01, 3.02 and 3.03 on the tax map of Linden, Union County, New Jersey.

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

15. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or RCRA, in which case the statutory definitions shall apply.

REQUEST FOR INFORMATION

1. Provide copies of all casualty, liability and/or pollution insurance policies, and any other insurance contracts (including, but not limited to, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies, Institutional Controls and Post Remediation Care Insurance) that you maintain or have maintained may potentially provide, or previously has provided, insurance for bodily injury, property damage and/or environmental contamination in connection with the GAF and/or the LCP Linden Sites. Include, without limitation, all comprehensive general liability, primary, excess, and umbrella policies.

2. If there are any such policies from Question 1 above of which you are aware but neither possess copies, nor are able to obtain copies, identify each such policy to the best of your ability by identifying:

a. The name and address of each insurer and each insured;
b. The type of policy and policy numbers;
c. The per occurrence policy limits of each policy; and
d. The effective dates for each policy.

3. Identify all payments by or settlements with any insurer which relates in any way to environmental liabilities and/or to the policies referenced in Questions 1 and 2 above, including:

a. The date of the payment or settlement;
b. The scope of release provided in connection with such payment or under such settlement;
c. The amount of money paid by the insurer.
Provide copies of all correspondence relating to such payment or such settlement agreements.

4. Identify all communications and provide all records and documents that evidence, refer, or relate to claims made in connection with the GAF and/or the LCP Linden Sites by or on **behalf of: G-1 Holdings Inc., GAF Chemical Corp., GAF Corporation or their successors or predecessors, or; Ashland Inc., International Specialty Products, Inc., ISP Environmental Services, Inc. or their successors or predecessors,** under any insurance policy referenced in

Questions 1 and 2 above. Include any responses from the insurer with respect to any claims.

5. Provide copies of all reports, correspondence and other records and documents filed with or submitted to the U.S. Securities and Exchange Commission ("SEC") or its staff, and the SEC's responses thereto, referencing the GAF and/or the LCP Linden Sites **or** insurance claims for the GAF and/or the LCP Linden Sites.

6. Provide copies of all records and documents, prepared prior to January 1, 2015, that define, characterize, describe or otherwise explain the meaning of the following terms as those terms are used in the attached Exhibit A and Exhibit B:

a. "Chemicals Business" (See Exhibit A, Paragraph 4(i).)

b. "Specialty Chemicals" (See Exhibit A, Paragraph 4(i).)

c. "Project Aware" (See Exhibit A, Paragraph 4(iii) (B).)

d. "Linden Site" (See Exhibit B, Schedule of Liabilities and Obligations.)

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of New Jersey
County of :

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

_____
NAME (print or type)

_____
TITLE (print or type)

_____
SIGNATURE

Sworn to before me this
day of , 2016

_____
Notary Public