CASTELLÓN & FUNDERBURK LLP
A LIMITED LIABILITY PARTNERSHIP INCLUDING A PROFSSIONAL CORPORATION
ATTORNEYS AT LAW

March 21, 2012

Via Certified Mail Return Receipt Requested & Electronic Mail
Mr. Thomas Martin, Associate Regional Counsel
United States Environmental Protection Agency, Region 5
77 W. Jackson Blvd., MC-14J
Chicago, Illinois 60640
martin.thomas@epa.gov

Re: Chemetco Superfund Site in Hartford, Illinois
Metal Briquetting Company

Dear Mr. Martin:

Our office represents Metal Briquetting Company ("MBC") and on January 17, 2012, we responded to the EPA's general notice letter dated November 30, 2011. After further evaluation and review of the documents sent by Michelle Kerr on January 12, 2012, in particular the CDM Phase 1 Report dated October 17, 2005, we learned that the total weight attributed to Metal Briquetting in Enclosure B to the November 30, 2011 letter is inaccurate.

Enclosure B to the November 30, 2011 letter states that the Total Weight All Materials for MBC is **1,197,064**. However, after further review and analysis of the CDM Phase 1 Report – this number is actually comprised of the following:

Metal Briquetting Company	914,423
Creative Brass Works	282,641
Total	**1,197,064**

Creative Brass Works and Metal Briquetting Company are two entirely separate companies. Creative Brass Works, a limited partnership, ceased operations in 2001 and the limited partnership was cancelled.

Because Creative Brass Works is an entirely separate company, it is incorrect and inaccurate to attribute Creative Brass Works' alleged total weight to MBC's alleged total weight for a combined figure of 1,197,064. In addition, because Creative Brass Works was cancelled and unaffiliated with MBC, any alleged liability attributable to Creative Brass Works should properly be treated as an orphan share and should not be allocated to MBC.

Accordingly, we request that the EPA remove Creative Brass Works' alleged potential liability from MBC's alleged potential liability. As a result, we request that MBC be viewed as a de minimis party for purposes of this site.

We look forward to receiving confirmation that the EPA agrees that MBC is a de minimis party by virtue of removing the alleged contribution from Creative Brass Works. In the meantime, should you have any questions or need further clarification, please feel free to contact the undersigned.

Very truly yours,

William W. Funderburk, Jr.

WWF:ss

cc: Michelle Kerr, Remedial Project Manager (via Electronic Mail Only at Kerr.Michelle@epamail.epa.gov)