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June 14, 2006

VIA CERTIFIED MAIL

Kim Muratore, Case Developer (SFD-7-B)
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: General Notice Letter/104(e) for the San Fernando Valley/North Hollywood Superfund Site
North Hollywood, California

Dear Ms. Muratore:

In further response to the information request contained in your General Notice Letter dated April 25, 2006, Los Angeles By-Products Co. submits the following preliminary information, together with continuing general objections, which are enclosed herewith.

I would also like to confirm your receipt of the information previously submitted under cover dated May 31, 2006. If you are not in receipt of the previously submitted information, please advise the undersigned.

The next set of responses to the requests for information will be due on June 28, and the final group would be due July 12, 2006.

Very truly yours,

Raul M. Montes

Raul M. Montes

General Objections To General Notice Letter (104(e))
And To Definitions Applicable To Appendix D; To Enclosure D:
Information Request And To All Contents Therein

"The Company" (as defined by EPA) and "Responding Party" shall be used interchangeably herein. Responding Party hereby raises a continuing objection to each and every Request for Information ("Request") contained in General Notice Letter/104(e) for the San Fernando Valley/North Hollywood Superfund site. Rather than repeat each objection for each request, Responding Party objects on the following grounds, including but not limited to, the Requests are overly broad; not reasonably limited in scope and time; are vague, ambiguous and uncertain, lack reasonable particularity; are burdensome and oppressive; and have been previously asked and answered. Responding Party hereby reserves its right to raise other objections, including but not limited to attorney-client privilege, attorney work-product doctrine and any other privileges, to the fullest extent provided by law.

Responding Party reserves the right to challenge the constitutionality and/or legality of each and every Request contained therein and to the entire contents of the General Notice Letter.

Responding Party is presently not engaged in litigation with EPA and therefore, these responses are made without prejudice to Responding Party's rights to present additional documents in the future, whether it be prior to any litigation and/or further proceedings in this action or as evidence at trial.

Responding Party, while complying with EPA's timetables, has not had the opportunity for conferring, adjudicating or otherwise limiting, modifying any of the Requests. Therefore, further investigation and/or discovery may lead to additions to, changes in and variations from the responses herein set forth. The responses are given without prejudice to Responding Party's ability to produce evidence of any subsequently discovered documents or facts and to change any and all responses herein, and/or to seek any limitations, challenges, and modifications of each and every Request. Responding Party also reserves its rights to challenge any and all Requests on privacy and/or confidentiality grounds at any time herein. Such reservations and challenges are applicable to the "Definitions applicable to Appendix D".

These General Objections are applicable to any and all Responses submitted to the EPA by Responding Party, including its first set of Responses.

If Responding Party becomes a defendant or party to any future litigation, Responding Party reserves its rights to seek any protective orders, modification orders and/or any available protections with regard to each and every Request.

Responses to Information Request

33. So far as it is known, there were and are no hazardous material business plans and chemical inventory forms for any of the Facilities submitted to city, county, and state agencies.

35. So far as it is known, no chemicals or hazardous substances were used at the Hewitt Pit Facility during the Company's operations at the Facility.

36. So far as it is known, no chemicals or hazardous substances were used at the Tuxford Facility during the Company's ownership or operations at the Facility.

51. The Company has no information indicating any discharge of any waste stream to the sewer at the Hewitt Pit Facility during the Company's operations at the Facility. So far as it is known, the Company did not have any sewer connection at that Facility and there were no permits or analyses during the Company's operations at the Facility.

52. The Company has no information indicating any discharge of any waste stream to the sewer at the Tuxford Facility during the Company's ownership or operations at the Facility. So far as it is known, the Company did not have any sewer connection at that Facility and there were no permits or analyses during the Company's ownership or operations at the Facility.

54. So far as it is known, the Company did not generate any waste streams at the Hewitt Pit Facility during the Company's operations at the Facility.

55. So far as it is known, the Company did not generate any waste streams at the Tuxford Facility during the Company's ownership or operations at the Facility.

57. So far as it is known, the Company did not generate any waste streams at the Hewitt Pit Facility during the Company's operations at the Facility.

58. So far as it is known, the Company did not generate any waste streams at the Tuxford Facility during the Company's ownership or operations at the Facility.

60. So far as it is known, the Company did not remove waste streams from sumps at the Hewitt Pit Facility during the Company's operations at the Facility.

61. So far as it is known, the Company did not remove waste streams from sumps at the Tuxford Facility during the Company's ownership or operations at the Facility.

63. So far as it is known, during the Company's operations at the Hewitt Pit Facility, no wastes were stored for shipment for disposal at the Facility.

64. So far as it is known, during the Company's operations at the Tuxford Facility, no wastes were stored for shipment for disposal at the Facility during the Company's ownership or operations at the Facility.

66. So far as it is known, during the Company's operations at the Hewitt Pit Facility, there were no leaks, spills or other releases into the environment of any hazardous substances or pollutants or contaminants that occurred at or from the Hewitt Pit Facility.

67. So far as it is known, during the Company's ownership and or operations at the Tuxford Facility, there were no leaks, spills or other releases into the environment of any hazardous substances or pollutants or contaminants that occurred at or from the Tuxford Facility.

69. So far as it is known, there is no correspondence between the Company and local, state or federal authorities concerning the use, handling, or disposal of hazardous substances at the Hewitt Pit Facility.

70. So far as it is known, there is no correspondence between the Company and local, state or federal authorities concerning the use, handling, or disposal of hazardous substances at the Tuxford Facility.

The foregoing information is based upon a diligent review of the Company's records in its possession and control.