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June 28, 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 enclosed preliminary information, together with a claim of confidentiality and continuing general objections, which are enclosed herewith. Los Angeles By-Products Co.'s responses, claim of confidentiality and continuing general objections are enclosed. However, due to the amount of documents being sent, they are being separately delivered by a common courier.

I would also like to confirm your receipt of the information previously submitted under cover dated June 14, 2006. If you are not in receipt of the previously submitted information, please advise the undersigned.

The final set of responses to the requests for information will be due on July 19, 2006, pursuant to agreement with Michael Massey on June 16, 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.

Claim of Confidentiality

Applicable to the

Solid Waste Assessment Test Reports

and Other Reports Provided

Please see the accompanying Solid Waste Assessment Test Reports ("SWAT") documents. The company is stating a claim of confidentiality as stated in each of the following responses and 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 RCRA, 42 U.S.C. §6927(b), and 40 C.F.R. §2.203(b) and any other relevant and/or applicable Statutes.

The following confidentiality claims are applicable to each and every SWAT document:

SCAQMD – Penrose Reports

1993 – 4th Q

1994 - 4th Q – 2nd Q – 3rd Q – 1st Q

1995 - 4th Q – 3rd Q – 2nd Q – 1st Q

1996 - 4th Q – 2nd Q – 3rd Q – 1st Q

1997 - 4th Q – 3rd Q – 2nd Q – 1st Q

1998 – 4th Q – 3rd Q – 1st Q Compliance Plan 1150.1

1999 - 4th Q – 3rd Q – 2nd Q – 1st Q

2000 – 4th Q – 1st Q

2001 - 4th Q – 3rd Q – 2nd Q

2002 - 4th Q – 3rd Q – 2nd Q – 1st Q

2004 – 2nd Q – 3rd Q

2005 – 4th Q – 1st Q – 3rd Q – 2nd Q

2004 – 2nd Semi Annual GWMR – STRATH

2005 – GWMR – January – June

2004 – GWMR – 1st Semi Annual – STRATH

1998 – 1st Quarter GWMR – STRATHERN

2005 – GWMR-STRATH- July – December

2003 – GWMR – STRATH – 2nd Quarter

2003- GWMR – 4th Quarter- Annual Sum. STRATH

2002 – GWMR – STRATH- 4th Quarter & Ann. Sum

Monitor Well Redevelp. Well 4928C – 2003

2002 – GWMR – STRATH – 2nd Quarter

2001 – GWMR – 1st Quarter – STRATH

2001 - GWMR – STRATH – Annual

2001 – GWMR – STRATH – 3rd Quarter

2000 – GWMR – STRATH – Ann. Sum

2000 – GWMR – STRATH – 1st Quarter

2000 – GWMR – STRATH – 3rd Quarter

1999 – GWMR – STRATH – Ann. Report

1999 – GWMR – STRATH – 1st Quarter

1998 – GWMR – STRATH – Ann. Report

1998 –GWMR – STRATH – 3rd quarter

1997 – GWMR – STRATH – 1st Quarter

1997 – GWMR – STRATH – 3rd Quarter

1997 - GWMR – STRATH – Ann. Report

1996 – GWMR – STRATH – Ann. Report

1995 – GWMR – STRATH – 1st Quarter

1995 – GWMR – STRATH – Ann. Report

1994 – GWMR – STRATH – Ann. Report

1994 – GWMR – STRATH – 3rd Quarter

1993 – GWMR – STRATH – 1st Quarter

1993 – GWMR – STRATH - Ann. Report

1992 – GWMR – STRATH – Ann. Report

1987 – GWMR – Penrose – 4th Quarter

Constr. Testing Vadose Zone Penrose & Newberry & Strath 1989

SWAT – 1989 – Penrose/Newberry/STRATH

CBI

CBI

Response to Information Request

7. The Company's operations at the Tuxford Facility during the period of time the Company operated at the Facility was limited to landfill operations until the landfill operations ceased and the landfill was closed. The landfill operations commence in approximately 1948 and continued until approximately 1955. So far as it is known, from 1955 to 1960, the Company's only activities at the Facility were in connection with complying with closure requirements of the regulatory agencies. So far as it is known, the Company did not conduct any operations at the Facility from 1960 to 1967 when it was sold to Sam Adlen. During the Company's landfill operations, only household refuse was accepted at the Facility.

24. The Company did not engage in the use of hazardous substances or disposal of wastes at the Penrose Facility, other than those wastes associated with the landfill operations. The Company does not otherwise have or had employees with knowledge of the use of hazardous substances and disposal of wastes at the Penrose Facility.

25. The Company did not engage in the use of hazardous substances or disposal of wastes at the Hewitt Pit Facility, other than those wastes associated with the landfill operations. The Company did not otherwise have employees with knowledge of the use of hazardous substances and disposal of wastes at the Hewitt Pit Facility.

26. The Company did not engage in the use of hazardous substances or disposal of wastes at the Tuxford Facility, other than those wastes associated with the landfill operations. The Company did not otherwise have employees with knowledge of the use of hazardous substances and disposal of wastes at the Tuxford Facility.

27. The Company estimates, at any given time, approximately 4 to 8 people were employed by the Company at the Penrose Facility. The only service performed by the Company at the Penrose Facility was and is landfill operations.

28. The Company estimates, at any given time, approximately 4 to 8 people were employed by the Company at the Hewitt Pit Facility. The only service performed by the Company at the Hewitt Pit Facility was landfill operations.

29. The Company estimates, at any give time, approximately 4 to 8 people were employed by the Company at the Tuxford Facility. The only service performed by the Company at the Tuxford Facility was landfill operations.

34. The Company did not use any chemicals or hazardous substances at the Penrose Facility. The Company does not have any Material Safety Data Sheets. So far as it is known, no chemical or hazardous substances were used at the Penrose Facility.

37. The Company did not use or transport to the Penrose Facility any volatile organic compounds. So far as it is known, no volatile organic compounds were used or transported to the Penrose Facility.

38. The Company did not use or transport to the Hewitt Pit Facility any volatile organic compounds. So far as it is known, no volatile organic compounds were used or transported to the Hewitt Pit Facility during the Company's operations at the Facility.

39. The Company did not use or transport to the Tuxford Facility any volatile organic compounds. So far as it is known, no volatile organic compounds were used or transported to the Tuxford Facility during the Company's ownership or operations at the Facility.

40. Copies of the requested information which is in the possession, custody or control of the Company is provided herewith.

43. Copies of the requested information which is in the possession, custody or control of the Company is provided herewith.

50. The Company did not discharge any of its waste stream to the sewer at the Penrose Facility.

56. The Company did not generate any waste streams at the Penrose Facility for transport to a disposal site.

59. The Company did not engage in the removal of waste streams from sumps at the Penrose Facility.

68. 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 Penrose Facility.

72. The Company has never owned a facility known as the Blue Diamond Pit

located near the Penrose Facility.

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