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November 14, 2007

VIA CERTIFIED MAIL

Kim Muratore, (SFD-7-5)
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: Supplemental Request for Information
San Fernando Valley Area 1/ North Hollywood Superfund Site

Dear Ms. Muratore:

In response to the supplemental request for information dated September 24, 2007, Los Angeles By-Products Co. submits the enclosed preliminary information, together with continuing general objections. Los Angeles By-Products Co.'s continuing general objections are enclosed.

Very truly yours,

Raul M. Montes

Raul M. Montes

RMM:akc
Enclosure

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.

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.

Response to Information Request

Supplemental Questions:

1. During the time period between the date the Company acquired the Strathern Inert Landfill until it began landfill operations in 1992, so far as it is known, the Company did not conduct any operations at the Strathern Inert Landfill. So far as it is presently known, the only operations conducted during that period of time were limited to temporary excavation activities by Blue Diamond. No other information is presently available.

2. After exercising due diligence, the Company has not located any information regarding the diversion of the flood channel into the Hewitt Pitt by Polich-Benedict Construction Co. So far as it is presently known, surface storm waters washed a berm, consisting of dirt, into the Hewitt Pitt. No other information is presently available.

3. After exercising due diligence, the Company has not located any information regarding the De Garmo Pit Landfill located at 11201 Randall Street, Sun Valley, California. So far as it is presently known, the Company operated a "transfer station" which collected recyclable ferrous materials at the site. No other information is presently available.

After exercising due diligence, the Company has not located any information regarding the relationship between the De Garmo Pit Landfill and the Community Recycling and Resource Recovery facility which currently operates at an adjacent property.

4. After exercising due diligence, the Company has not located any information regarding the Victory-Vineland Landfill located at 11051 Victory Blvd., North Hollywood, California. So far as it is presently known, the Company did operate a landfill which was sold and was subsequently excavated and filled by the City of Los Angeles. No other information is presently available.

5. So far as it is presently known to the Company, the Newberry Landfill was formerly known as the Tujunga Landfill.

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