UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

URGENT LEGAL MATTER—PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

November 21, 2013

Rumford Paper Company
c/o George F. Martin, President
NewPage Corporation
8540 Gander Creek
Miamisburg, OH 45342

Re: Request for Information Pursuant to Section 104 of CERCLA
Leeds Metal Superfund Site, Leeds, Maine

Dear Mr. Martin:

This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Leeds Metal Superfund Site located at Blue Rock Road in Leeds, Androscoggin County, Maine (the "Site"). The Site is further identified by the Town of Leeds Tax Assessor's Office as Map #4, Lot #38.

The United States Environmental Protection Agency ("EPA") is investigating the release or threatened release of hazardous substances, pollutants, and contaminants at the Site. This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to or generated, treated, stored, or disposed of at the Site. EPA is also seeking information concerning those persons responsible for the cleanup of the Site and their ability to undertake or finance that cleanup.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in the Enclosure to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request within thirty (30) days of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to thirty-seven thousand five hundred dollars ($37,500) for each day of non-compliance.

SDMS Doc ID 549505

Please note that responses which are incomplete, ambiguous, or evasive will be treated as complete non-compliance with this Information Request. Also be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 *et seq*. Your response to this Information Request should be mailed to:

Barbara O'Toole
US EPA New England
5 Post Office Square Suite 100 (OSRR07-2)
Boston, MA 02109-3912

If you have general questions concerning the Site or this Information Request, please contact Anni Loughlin, Remedial Project Manager, U.S. Environmental Protection Agency, 5 Post Office Square, Suite 100 (OSRR07-1), Boston, MA 02109-3912 at (617) 918-1273. If you have any legal questions, or if your attorney wishes to communicate with EPA on your behalf, please contact Maximilian Boal, Enforcement Counsel, U.S. Environmental Protection Agency, 5 Post Office Square, Suite 100 (OES04-2), Boston, MA 02109-3912, at (617) 918-1750.

Due to the seriousness of the problem at the Site and the legal ramifications of your failure to respond properly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above.

Thank you for your cooperation in this matter.

Sincerely,

Michael Jasinski, Acting Chief
ME, VT, and CT Superfund Section

Enclosure

cc: Maximilian Boal, EPA Enforcement Counsel
Anni Loughlin, EPA Remedial Project Manager
Barbara O'Toole, EPA Enforcement Coordinator
Becky Blais, Project Manager, Maine Department of Environmental Protection
Patti Ludwig, EPA CERCLIS Data Administrator
Judy Lao, EPA FOIA Specialist

INFORMATION REQUEST FOR
LEEDS METAL SUPERFUND SITE

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* **Period Being Investigated: 1970 to Present** *
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In addition to the questions which follow, this enclosure includes a declaration, a site description, detailed instructions for responding to this request, and definitions of words such as "Respondent," "identify," "waste," and "asset" used in the questions. These materials appear at the end of the questions; please refer to them in answering all questions. Of particular importance:

- Answer each question with respect to the period being investigated noted above unless the question indicates otherwise.
- Answer all questions completely in accordance with the definitions and instructions.
- Complete the enclosed declaration.
- For each question, identify all persons and documents relied upon in the preparation of the answer.
- All information provided for which you are making a claim of business confidentiality or which contains personal privacy information should be contained on separate sheets and clearly marked as confidential or private.

This request imposes a continuing obligation upon you to submit responsive information discovered after your original response is submitted to EPA.

INFORMATION REQUEST QUESTIONS

1. General Information about Respondent:

NOTE: All questions in this section refer to the present time unless otherwise indicated.

NOTE: The "Respondent" of this letter is Rumford Paper Company and is more completely defined in the Information Request Definitions.

a. Provide the full legal name and mailing address of the Respondent.

b. For each person answering these questions on behalf of Respondent, provide:

   i. Full name;
   ii. Title;
   iii. Business address;
   iv. E-mail address; and
   v. Business telephone and fax numbers

c. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including any legal notices, please so indicate here by providing that individual's name, address, e-mail address, and telephone and fax numbers.

d. Describe the nature of Respondent's current business, including but not limited to a brief description of the major products or services Respondent provides.

2. Respondent's Legal and Financial Status:

NOTE: All questions in this section refer to the period being investigated.

a. Describe Respondent's legal status including but not limited to the form of the business (*i.e.*, corporation, partnership, etc.), details of incorporation including date, state of incorporation, date authorized to do business in Maine, and current status of authorization to do business both in Maine and in home state.

b. List the names of the Respondent's most recent agent for service of process, officers and directors.

c. If the Respondent has ever done business under any other name provide the name(s) and dates during which such name(s) were used by Respondent.

d. If Respondent is or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each such corporate

relationship.

e. If Respondent no longer exists as a legal entity, provide a brief description of the dissolution including, date and how and to whom the assets were distributed. Include a copy of all documents with your response.

f. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving stock sale, asset purchases, or mergers, provide a brief description of the nature of the transaction, the parties involved, date of the transaction(s). Include a copy of all documents with your response.

g. If Respondent has filed for bankruptcy, provide the date, docket number and name of U.S. Bankruptcy Court in which the petition was filed. Provide a brief description of the current status of the petition.

h. Identify all of Respondent's related entities, affiliates, predecessors, or successors, and provide a description of the relationship. Provide documents that memorialize such relationship including but not limited to contracts, purchase and sale agreements, mergers, or acquisitions.

i. Identify each and every party to whom the Respondent subleased its interest in the Site. Provide copies of all such subleases. Describe subleasee's operations on the Site.

j. For the period being investigated, list all insurance policies owned by Respondent, the policy number, the insurance company, and the insurance agent. Provide copies of all policies.

k. Provide the names of all Superfund sites in New England for which Respondent has received a request for information from EPA.

l. Describe the nature of Respondent's operations at all other facilities in New England.

3. Respondent's Operations:

NOTE: All questions in this section refer to the period being investigated and Respondent's operations in the State of Maine.

NOTE: The "Site" is shown on the attached Figure labeled 'Figure 2 Property Map' and is more completely defined in the Information Request Definitions.

a. Describe the nature of Respondent's current business and operations, including but not limited to a brief description of the major products or services

Respondent provides and the dates, location, and materials used in such operations.

b. Describe in detail any agreement/contract Respondent has had with National Metal Converters, Inc., Harry Zaitlin, Irving Zaitlin, and/or Harold Siagel.

c. Describe in detail any agreement/contract Respondent has had with Leeds Metal, Inc., and/or Stephen Erb.

d. Describe in detail any agreement/contract Respondent has had with Michael Schiavone & Sons, Inc., Schiavone of Maine, Inc., and/or Michael Schiavone.

e. Describe in detail any agreement/contract Respondent has had with Maine Central Railroad and/or Pan Am Railways regarding the removal, transport, recycling, or disposal of materials from Respondent's facilities in Maine.

f. Describe in detail any agreement/contract Respondent has had with any other entity operating at the Site. In addition, identify any other company operating at the Site and describe in detail any arrangements Respondent has had with each company including the time period of Respondent's involvement.

g. Provide all business records pertaining to Respondent and: (1) National Metal Converters; (2) Leeds Metal, Inc.; (3) Michael Schiavone & Sons, Inc; (4) Schiavone of Maine, Inc.; (5) Maine Central Railroad; (6) Pan Am Railways; or (7) any other company operating at the Site, including:

    i. Copies of correspondence to and from these companies, including letters, memoranda (both internal and external);

    ii. Copies of invoices, manifests, bills-of-lading, purchase orders, tickets, and any other documents pertaining to shipping, receiving, and transporting materials; and

    iii. Copies of all business records pertaining to sale, transfer, delivery, disposal, of any hazardous substances, scrap materials, and/or recyclable materials to the Site.

If you are unable to provide any or all of these documents, explain why, and what you did to find them.

h. If you have reason to believe that someone could provide a more detailed or complete response to any of these questions or requests for copies of documents, or if you have reason to believe that there could be someone who may be able to provide additional documents that would be responsive to these questions and requests for copies of documents, identify such person(s), identify the additional

documents that they may have, and describe any information related to these questions that they may have.

i. Provide details, including dates and materials involved of all on-Site spills or releases of hazardous materials of which you have knowledge and that occurred during the processing of recyclable materials containing hazardous substances at the Site.

j. To the extent not identified in question 3(g), identify all transactions or agreements for disposal in which Respondent gave, sold, transferred any material or item, scrap materials, waste materials, pollutant, or contaminant, including transformers to the Site. In addition:

   i. State the dates on which each such person may have given, sold, transferred, or delivered such material.

   ii. Describe the materials or items that may have been given, sold, transferred, or delivered, including type of material, chemical content, physical state, quantity by volume and weight, and other characteristics.

   iii. Describe the nature, including the chemical content, characteristics, physical state (*e.g.*, solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each such arrangement.

   iv. State whether any of the hazardous substances identified in subpart iii. above exhibit any of the characteristics of a hazardous waste identified in 40 C.F.R. Section 261, Subpart C.

k. What if any other materials did Respondent send to the Site (items/materials not covered in question 3(j) above)?

Describe the purpose of each sale, transfer, or delivery of materials to the Site.

l. Describe what was done to materials indicated in your response to questions 3(j) and 3(k), above, once they were brought to the Site including any further processing of the materials.

m. Identify the person who sold, transferred, delivered, and selected the Site as the location at which materials were to be disposed or treated.

n. Describe where the persons identified in your response to question 3(m), above, planned to have the materials involved in each agreement/contract disposed of and identify all documents mentioning these arrangements for disposal.

o. Describe all efforts (*i.e.*, site visits) taken by the persons identified in your

response to question 3(m), above, to determine what would be done with the materials that may have been sold, transferred, or delivered after such materials had been sold, transferred, or delivered to the Site.

p. For each sale, transfer, or delivery of materials to the Site, had any hazardous substances been added to the materials described in your response to questions 3(j) and 3(k), above? If so, by whom, the company responding to this Request or the operator? Why were these hazardous substances added to the materials?

q. Describe the source of or the process that produced the materials described in your response to questions 3(j) and 3(k), above.

r. Identify all individuals who currently have, or who previously had, responsibility for your company's environmental matters (*e.g.*, responsibility for the disposal, treatment, storage, recycling, or sale of your company's wastes, scrap materials and/or recyclable materials). Hereafter, these individuals are referred to as environmental caretakers. For each environmental caretaker indicate the dates of the individual's employment or contractual obligation (*i.e.*, the dates indicating the length of the individual's tenure(s)), the nature of the individual's duties and responsibilities, and a description of the type of environmental information that the individual would know.

s. If any of the transactions referred to in your response to questions 3(j) and 3(k) involved metals or electrical equipment answer all questions under the section headed "Questions and Requests for Documents Related to Scrap Metal" and "Questions and Requests for Documents Related to Electrical Equipment" below. Answer these questions separately for each person identified in response to question 3(j), reading "you" in each case as referring to the person who may have given, sold, transferred, or delivered the material or item containing any hazardous substance, pollutant, or contaminant, including transformers to the Site.

4. <u>Questions and Requests for Documents Related to Scrap Metal</u>:

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

ALSO NOTE: All questions in this section refer to Respondent's operation in the State of Maine.

a. For the following questions which relate to transactions involving scrap metals, provide the requested information, and also provide copies of any documents that contain any information that is related to the response:

i. List all shipments of scrap metal Respondent sent from its facilities,

including but not limited to all shipments to the Site. In this list, include the date for each transaction, the type and quantity of scrap metal sent, the amount paid or collected in connection with each transaction, the method of payment, and identify the person making or receiving payment.

ii. Did a market exist for the scrap metal listed in your response to question a(i), above? If so, describe the nature of such market at the time of the transaction (possible uses, possible consumers, etc.) and the source of that commercial specification grade (*e.g.*, ISRI, Department of Defense, or wherever your company would find the grade published).

iii. What commercial specification grade did the scrap metal meet listed in your response to question a(i) meet? Identify/list the commercial specification grades that each scrap metal identified in a(i) met.

iv. At the time of the transaction(s) involving scrap metal listed in your response to question a(i), what was the intended disposition of the scrap metal at the Site?

v. After sale, transfer, delivery, or disposal, what portion of the scrap metal listed in your response to question a(i) was to be made available for use as a feedstock for manufacturing of new saleable products? Explain how the portion identified in this answer was derived or calculated.

vi. Could the scrap metal listed in your response to question a(i) have been used as a replacement or substitute for a virgin raw material? If so, provide details.

vii. Could any products to be made from the scrap metal listed in your response to question a(i) have been used as a replacement or substitute for a product made, in whole or in part, from a virgin raw material? If so, provide details.

viii. Did your company melt the scrap metal listed in your response to question a(i) before it was transported/delivered to the Site? If yes, describe the process used for melting the scrap metal. In addition, explain whether your company ever sent dross or skimmings to the Site.

ix. Was the transaction between your company and the facility at the Site: 1) an outright sale; 2) subject to a written or verbal "tolling" agreement between the companies; or 3) reflected the "banking" of the transacted material in a metal account at the request of your company for return or other disposition at a later date.

b. Did Respondent have a basis for believing that the scrap metal listed in your

response to question a(i) would be recycled? If not, what was that basis? Provide supporting documentation.

c. Describe all efforts (*i.e.*, site visits) taken by Respondent to determine what would be done with the scrap metal identified in your response to question a(i) that may have been sold, transferred, or delivered to the Site.

d. What steps (*e.g.*, internal procedures, federal, state, and local compliance inquiries) were taken by Respondent to ensure that National Metal Converters, Leeds Metal, Inc., Michael Schiavone & Sons, Inc., Schiavone of Maine, Inc., Maine Central Railroad, or Pan Am Railways were receiving the scrap metal listed in your response to question a(i) in compliance with applicable Federal environmental regulations or standards, and any amendments with respect to scrap metal?

e. Did Respondent have a basis for believing that the facility at the Site was in compliance with substantive provisions of any Federal, State, or local environmental law or regulation, or compliance order or decree applicable to the handling, processing, reclaiming, storage, or other management activities associated with the scrap metal listed in your response to question a(i)? If not, what was that basis? Provide supporting documentation.

f. Describe the efforts Respondent undertook with respect to the management and handling of the scrap metal listed in your response to question a(i), including the extent to which you complied with customary industry practices current at the time of the transaction designed to minimize contamination of scrap metal by hazardous substances.

g. Provide all information in your possession that shows that you were in compliance with applicable Federal environmental regulations or standards regarding the storage, transport, management, or other activities associated with the recycling of scrap metal listed in your response to question a(i).

h. For each time scrap metal was taken from Respondent's facilities, or from facilities operated by Respondent, indicate whether the scrap metal was transported by Respondent, or by a separate company. In the case of the latter, identify both the individual and the company supplying the transportation services.

   i. For each type of scrap metal specify which carrier picked it up.

   ii. For each type of scrap metal, state how frequently each carrier picked up such scrap metal.

   iii. For each type of scrap metal state the volume picked up by each carrier

(per week, month, or year).

iv. For each type of scrap metal state the dates (beginning & ending) such scrap metal was picked up by each carrier.

5. Questions and Request for Documents Related to Electrical Equipment:

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

ALSO NOTE: All questions in this section refer to Respondent's operation in the State of Maine.

a. For the following questions which relate to transactions involving electrical equipment (*e.g.*, transformers, capacitors, other electrical equipment), provide the requested information, and also provide copies of any documents that contain any information that is related to the response:

b. List all shipments of electrical equipment Respondent sent from its facilities, including but not limited to all shipments to the Site. In this list, include the following:

i. the type and quantity of electrical equipment sent;
ii. the date each equipment was taken out of service or the date(s) scrapped;
iii. the date for each transaction;
iv. the amount paid or collected in connection with each transaction, the method of payment; and
v. identify the person making or receiving payment.

c. At the time of the transaction, what was the intended deposition of the electrical equipment listed in your response to question 5(b) at the facility?

d. For each piece of equipment listed in your response to question 5(b), indicate whether it was oil-filled when in use. Supply any and all records that may indicate the contents of the oil, in particular whether the oil may have contained Polychlorinated Biphenyls (PCBs). Briefly indicate what steps were taken to determine whether the oil contained PCBs at the time the equipment was taken out of service or disposed of, and explain what precautions were taken to ensure that any PCBs contaminating the equipment were disposed of properly.

e. For each time equipment was taken from your property, or from property operated by Respondent, indicate whether the equipment was transported by Respondent, or by a separate company. In the case of the latter, identify both the individual and the company supplying the transportation services.

i. Specify which carrier picked up electrical equipment.

ii. State how frequently each carrier picked up such electrical equipment.

iii. State the volume of electrical equipment picked up by each carrier (per week, month, or year).

iv. State the dates (beginning & ending) such electrical equipment was picked up by each carrier.

f. Has Respondent ever shipped transformers or any other oil-filled electrical equipment to the Site? If so, provide the following details for each item that may have been sent to the Site:

i. The name of the manufacturer, manufacture date, and serial number;
ii. The quantity of oil contained in the equipment;
iii. The concentration of PCBs contained in the oil;
iv. The purpose of the shipment (*i.e.*, repair or resale);
v. The date on which the equipment left your facility;
vi. The time period which the equipment remained at the Site;
vii. The company name, address, and telephone number of the transporter; and
viii. The names, address, telephone numbers, and dates of ownership of any and all prior owners.

g. Provide legible copies of any and all contracts, invoices, receipts, or other documents describing the transactions that your company implemented with Respondent for each item identified for all questions above.

h. What environmental or other precautions, if any, were taken by Respondent to ensure compliance with the Toxic Substance Control Act, which regulates PCBs, including their disposal, to insure compliance with other environmental laws, and/or to avoid improper disposal of hazardous wastes?

i. Describe the efforts Respondent undertook with respect to the management and handling of the electrical equipment identified in 5(b), including the extent to which you adhered to customary industry practices current at the time of the transaction designed to minimize contamination of these materials by hazardous substances.

j. What basis, if any, did Respondent have for believing that the facility at the Site was or was not in compliance with substantive provisions of any Federal, State, or local environmental law or regulation, or compliance order or decree issued applicable to the handling, processing, reclamation, or other management activities associated with the electrical equipment?

6. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By-Products):

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

ALSO NOTE: All questions in this section refer to Respondent's operation in the State of Maine.

a. Identify all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's materials and/or wastes in the State of Maine.

b. Identify all individuals who currently have and those who have had knowledge of the disposal/treatment/storage/recycling/sale of Respondent's materials and/or wastes.

c. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters.

d. For the previous three responses, also provide each individual's:

   i. job title;
   ii. duties;
   iii. dates performing those duties;
   iv. supervisors for those duties;
   v. current position or, if such individual is no longer employed by Respondent, the date of the individuals resignation; and
   vi. the nature of the information possessed by such individuals concerning Respondent's waste management.

e. Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:

   i. the type of container (*e.g.* 55 gal. drum, dumpster, etc.);
   ii. the colors of the containers;
   iii. any distinctive stripes or other markings on those containers;
   iv. any labels or writing on those containers (including the content of those labels);
   v. whether those containers were new or used; and
   vi. if those containers were used, a description of the prior use of the containers.

f. For each type of waste describe Respondent's contracts, agreements, or other

arrangements for its disposal, treatment, or recycling.

g. Provide copies of such contracts and other documents reflecting such agreements or arrangements.

h. State where Respondent sent each type of its waste for disposal, treatment, or recycling.

i. Identify all entities and individuals who picked up waste from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).

j. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.

k. For each type of waste specify which Waste Carrier picked it up.

l. For each type of waste, state how frequently each Waste Carrier picked up such waste.

m. For each type of waste state the volume picked up by each Waste Carrier (per week, month, or year).

n. For each type of waste state the dates (beginning & ending) such waste was picked up by each Waste Carrier.

o. Provide copies of all documents containing information responsive to the previous seven questions.

p. Describe the vehicles used by each Waste Carrier to haul away each type of waste including but not limited to:

   i. the type of vehicle (*e.g.*, flatbed truck, tanker truck, containerized dumpster truck, etc.);
   ii. names or markings on the vehicles; and
   iii. the color of such vehicles.

q. Identify all of each Waste Carrier's employees who collected Respondent's wastes.

r. Indicate the ultimate disposal/recycling/treatment location for each type of waste.

s. Provide all documents indicating the ultimate disposal/recycling/treatment

location for each type of waste.

t. Describe how Respondent managed pickups of each waste, including but not limited to:

   i. the method for inventorying each type of waste;
   ii. the method for requesting each type of waste to be picked up;
   iii. the identity of the waste carrier employee/agent contacted for pickup of each type of waste;
   iv. the amount paid or the rate paid for the pickup of each type of waste;
   v. the identity of Respondent's employee who paid the bills; and
   vi. the identity of the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of waste.

u. Identify the individual or organization *(i.e.*, the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.

v. State the basis for and provide any documents supporting the answer to the previous question.

w. For all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations, complete the enclosed Waste Survey and respond to all previous questions of this Information Request with reference to such wastes.

x. If not already provided, specify the dates and circumstances when Respondent's waste was taken to the Site, and identify the companies or individuals who brought Respondent's waste to the Site. Provide all documents which support or memorialize your response.

7. <u>Information about Others</u>:

a. If you have information concerning the operations or ownership of the Site or the source, content, or quantity of materials placed or disposed at the Site which is not included in the information you have already provided, provide that information.

b. If not already included in your response, if you have reason to believe that there may be persons, including persons currently or formerly employed by Respondent, who are able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons, their addresses and phone numbers, and the additional information or documents they may have.

c. If not already provided, identify all persons, including Respondent's current and former employees who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

The following form of declaration must accompany all information submitted by Respondent in response to the Information Request:

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of

_____ (Respondent) and that the foregoing is complete,

true, and correct.

Executed on _____, 2013

_____
Signature

_____
Print or type name

INFORMATION REQUEST INSTRUCTIONS

1. Answer Every Question Completely. You are required to provide a separate answer to each and every question and subpart of a question set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.

2. Number Each Answer. Number each answer with the number of the question to which it corresponds.

3. Provide Information about the Period Being Investigated. You are required to answer each question with respect to the period being investigated, unless the question specifically states otherwise. If the response fails to address the period being investigated, EPA will consider this a failure to comply with the request and may take action against you for this noncompliance.

4. Provide the Best Information Available. You must provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.

5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.

6. Submit Documents with Labels Keyed to Question. For each document produced in response to this Information Request, indicate on the document (or in some other reasonable manner) the number of the question to which it responds.

7. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA. Failure to supplement your response within 30 days of discovering such responsive information may subject you to $37,500 per day penalties. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. If any part of the response to this Information Request is found to be false, the signatory to the response and the company may be subject to criminal prosecution.

8. Complete the Enclosed Declaration. You are required to complete the enclosed declaration which certifies that the information you are providing in response to this Information Request is true, accurate, and complete.

9. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You 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), and 40 C.F.R. § 2.203(b).

All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "confidential business information," "trade secret" or "proprietary" or "company confidential." Personal financial information, including individual tax returns, may also be claimed as confidential. In addition, please note that you bear the burden of substantiating your confidentiality claim. Your claim of confidentiality should be supported by the submission of information supporting such a claim; the type of information to be submitted is set out in 40 C.F.R. Part 2. Information covered by a claim of confidentiality will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201- 2.311. **If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.** You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

10. Disclosure to EPA Contractor. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, 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 Information Request to one or more of its private contractors listed in the attached EPA Contractor List for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. 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 Information Request.

11. 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." You should note however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you. (Please see Instruction 9 for information concerning treatment of individual tax returns.)

12. Objections to Questions. While the Respondent may indicate that it objects to certain questions in this Information Request, it must provide responsive information notwithstanding those objections. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.

13. Claims of Privilege. If you claim that any document responsive to this Information Request is a communication for which you assert that a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege. For any document for which you assert that a privilege exists for a portion of it, provide the portion

of the document for which you are not asserting a privilege, identify the portion of the document for which you are asserting the privilege, and provide the basis for such an assertion. Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

EPA CONTRACTOR LIST
Updated August, 2013

CONTRACTOR	CONTRACT NUMBER
ASRC Primus Solutions, Inc. Subcontractor: Booz Allen Hamilton Effective: August 22, 2013	Contract # EP-W-11-024
ICF International Effective: February 1, 2012	Contract # EP-BPA-12-W-00003
Eisenstein Malanchuk LLP Effective: March 1, 2013	Contract # EP-W-013-006
H&S/Nobis Effective: September 23, 2011 Subcontractor: TechLaw, Inc.	START 8(a) Contract # EP-S1-11-03

INFORMATION REQUEST DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 *et seq.*, RCRA, 42 U.S.C. Section 6901 *et seq.*, or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

1. The term "you" or "Respondent" shall mean the addressee of this Request, Rumford Paper Company, care of ("c/o") George F. Martin, President, the addressee's officers, managers, employees, contractors, trustees, successors, assigns, and agents, and any predecessor or successor corporations or companies.

2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information, including, but not limited to, electronic information. "Document" shall include, but not be limited to:

(a) writings of any kind, including electronic documents, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:

1. invoice, receipt, endorsement, check, bank draft, cancelled check, deposit slip, withdrawal slip, order;
2. letter, correspondence, fax, telegram, telex, E-mail;
3. minutes, memorandum of meetings and telephone and other conversations, telephone messages;
4. agreement, contract, and the like;
5. log book, diary, calendar, desk pad, journal;
6. bulletin, circular, form, pamphlet, statement;
7. report, notice, analysis, notebook;
8. graph or chart; or
9. copy of any document.

(b) microfilm or other film record, photograph, or sound recording on any type of device;

(c) any tape, disc, or other type of memory generally associated with computers and data processing, together with:

1. the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory; and

2. printouts of such punch card, disc, or disc pack, tape or other type of memory; and

(d) attachments to or enclosures with any document as well as any document referred to in any other document.

3. The term "identify" or "provide the identity of" means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with job title, position or business; and (d) the person's social security number.

4. The term "identify" or "provide the identity of" means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth: (a) its full name; (b) complete street address; (c) legal form *(e.g.* corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.

5. The term "identify" or "provide the identity of" means, with respect to a document, to provide: (a) its customary business description (*e.g.*, letter, invoice); (b) its date; (c) its number if any (*e.g.*, invoice or purchase order number); (d) the identity of the author, addressor, addressee and/or recipient; (e) and a summary of the substance or the subject matter. Alternatively, Respondent may provide a copy of the document.

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

7. The terms "the period being investigated" and "the relevant time period" shall mean the period being investigated as specified on the first page of the Information Request Questions.

8. The terms "the Site" or "the facility" shall mean and include the property on or about the 36 acres of land in Leeds, Maine, currently identified by EPA as the Leeds Metal Superfund Site, located in Leeds, Androscoggin County, Maine, which is more fully described in the enclosed Site Description.

9. The term "waste" or "wastes" shall mean and include automobile shredder waste, auto residue, trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

10. The term "asset" shall mean and include but not be limited to the following: cash, commodities, personal property, collectibles, real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies, interests in partnerships, corporations, and unincorporated companies, whether foreign or domestic, securities, patents, stocks, bonds, and other tangible as well as intangible property.

11. The term "real estate" shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

SITE DESCRIPTION

The Leeds Metal Superfund Site includes approximately 36 acres of mixed residential/ industrial property located on Blue Rock Road in southeastern Leeds, Androscoggin County, Maine. The approximate extent of the Site is believed to be bounded: to the north by Blue Rock Road and a sand, gravel, and concrete facility known as Blue Rock Industries; to the west by Route 106: to the south by wooded wetlands and residential properties; and to the east by the Rumford Branch line of the Maine Central Railroad, as part of the Pan Am Railways system. The Site is further identified by the Town of Leeds Tax Assessor's Office as Map #4, Lot #38.

Beginning in approximately the mid-1800s, the Site has been owned by Maine Central Railroad Company, a subsidiary of Pan Am Railways, Inc. The Site was formerly mined for sand and gravel and was known as Libby's Pit. Portions of the Site have been leased to various entities since at least the 1950s. From approximately 1969-1984, scrap metal recovery processes were conducted on the property by various entities. Junk automobiles were disposed of and shredded onsite. Auto fluff, consisting of non-ferrous materials generated during the automobile shredding process, was stockpiled at the Site. Gasoline and other fluids from junked cars were disposed of directly onto the ground, and as many as 100 drums were staged along the tree line in the southern part of the Site. The Leeds Fire Department responded to numerous fires at the Site. The Site is currently inactive and unoccupied, and it appears to have remained abandoned since operations ceased in 1984.

Hazardous substances present at the Site include polychlorinated biphenyls ("PCBs"), volatile organic compounds ("VOCs"), including, tetrachloroethene ("PCE") and trichloroethene ("TCE"), and metals (arsenic, cadmium, chromium and lead). Specific portions of the Site at which a release of hazardous substances has occurred include, but are not limited to: approximately 40,000 cubic yards of auto fluff; the former Operations Area; and, a groundwater plume of VOCs that is documented onsite and has extended southward, contaminating drinking water supply wells at concentrations exceeding health-based benchmarks.

The Maine Department of Environmental Protection ("ME DEP") has coordinated removal of drummed waste and an abandoned transformer; sampled soil, sampled nearby private drinking water wells to identify possible off-site migration of wastes; overseen a series of investigations to assess the Site and groundwater in the area; and installed carbon filtration devices at five homes with VOC contamination exceeding the state's health benchmarks. EPA completed a preliminary assessment/site investigation ("PA/SI") in 2010 that documented the need for response actions to address imminent hazards posed by uncontrolled Site wastes. ME DEP continues to monitor and filter drinking water wells in the area.

The Leeds Metal Superfund Site was placed on the National Priorities List ("NPL") on September 18, 2012.

END OF THE INFORMATION REQUEST

THANK YOU FOR YOUR ASSISTANCE IN THIS MATTER

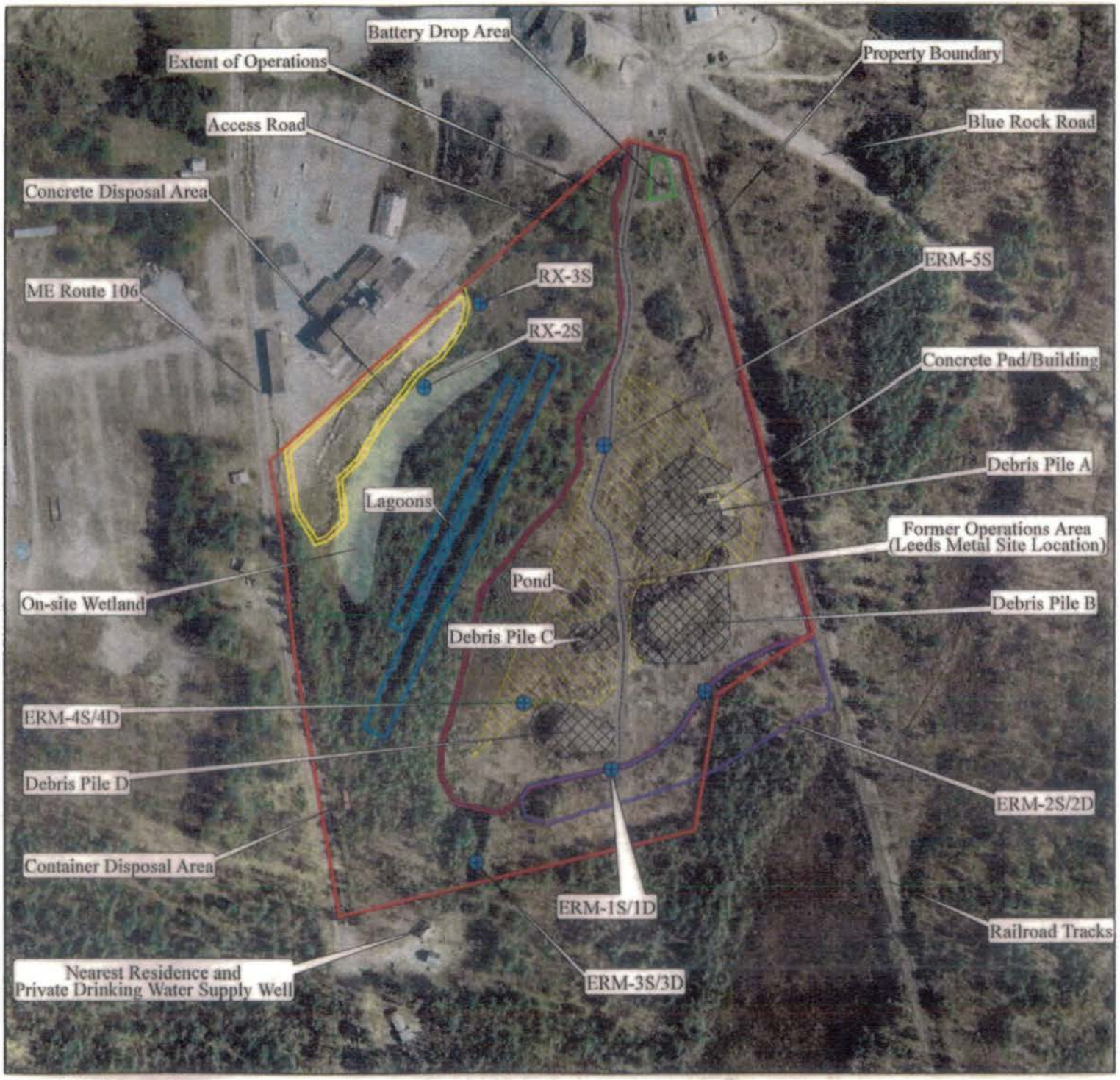

Figure 2

Property Map

Leeds Metal
Along Blue Rock Road
Leeds, Maine

EPA Region I
Superfund Technical Assessment and Response Team (START) III
Contract No. EP-W-05-042

TDD Number:	10-03-0002
Created by:	G. Hornok
Created on:	16 August 2010
Modified by:	G. Hornok
Modified on:	13 July 2011

LEGEND

- **Property**
- **Monitoring Wells**
- **Access Road**
- **Former Operations Area**
- **Drum Disposal Area**
- **Extent of Operations**
- **Debris Pile**
- **Container Disposal Area**
- **Concrete Disposal Area**
- **Lagoons**
- **Battery Drop Area**
- **Wetland**

0 50 100 200 300 400 500 600 Feet

Data Sources:
Imagery: Me GIS Spring 2003 Orthoimagery
All other data: START GPS Data Collected as part of EPA Site Inspection, References 14, 15, 16, and 17 .

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Leeds

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