UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE – SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

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

August 30, 2017

Ansonia Specialty Metals, LLC
William E. Wolf, Manager
905 Sunset Road
Winnetka, IL 60093-3621

Re: Notice of Potential Liability and Invitation to Perform or Finance Proposed Cleanup Activities for the Liberty Street Ansonia Copper and Brass Site, Ansonia, CT

Dear Mr. Wolf:

This letter serves to Ansonia Specialty Metals, LLC ("you") of potential liability regarding the Liberty Street Ansonia Copper and Brass Site in Ansonia, CT ("Site"), as defined by Section 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), commonly known as the federal "Superfund" law. This letter also notifies you of planned removal activities at the Site which you are invited to perform or finance, and which you may be ordered to perform at a later date.

NOTICE OF POTENTIAL LIABILITY

Under CERCLA, the United States Environmental Protection Agency ("EPA") is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment, *i.e.*, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. EPA has documented that a release has occurred, and there is a threat of additional releases, at the Site located at 75 Liberty Street and 7 Riverside Drive in Ansonia, New Haven County, CT. Both properties are owned by Ansonia Copper & Brass, Inc. The 75 Liberty Street property is fully described by the City of Ansonia as Parcel ID 03300190000, and recorded on a deed in Book 205, Page 614. The 7 Riverside Drive property is fully described by the City of Ansonia as Parcel ID 03500010004, and on a deed in Book 233, Page 8.

Hazardous substances, pollutants, and contaminants involved in the release or threat of release of hazardous substances at the Site include, but are not limited to: PCBs, heavy metals (lead is the primary), corrosive wastes, friable asbestos and friable asbestos containing material ("ACM"). EPA has spent public funds and is considering spending additional public funds to investigate and address the releases and/or threatened release(s) at the Site. Based on information presently

available to EPA, as an operator of the Site, EPA has determined that you are potentially liable under CERCLA for the cleanup of the Site, which you are invited to perform or finance and which you may be ordered to perform at a later date. Unless you or some other potentially responsible party ("PRP") or parties commit to properly performing or financing such actions, EPA will perform these actions pursuant to Section 104 of CERCLA, 42 U.S.C. § 9604.

EXPLANATION OF POTENTIAL LIABILITY

Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) and 9607(a), Section 7003 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6973, and other laws, potentially responsible parties ("PRPs") may be required to implement cleanup actions deemed necessary by EPA to protect public health, welfare, or the environment. PRPs may also be responsible for all costs incurred by the Government in responding to any release or threatened release at the Site. Such actions and costs may include, but are not limited to: expenditures for investigations, planning, response, disposal, oversight, and enforcement activities.

PRPs include current and former owners and operators of a Site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the Site, and persons who accepted hazardous substances for transport and selected the Site to which the hazardous substances were delivered.

Based on information gathered during investigations of the Site, EPA believes that you are a PRP under Section 107(a) of CERCLA with respect to the Site. Specifically, EPA has reason to believe that you are an operator or were a former operator of the Site during the time of disposal and have potential liability for the Site. You are urged to voluntarily perform or finance those response activities that EPA determines are necessary at the Site.

OUTLINE OF SITE RESPONSE ACTIVITIES

In accordance with CERCLA and other authorities, EPA has taken the following response actions at the Site under the authority of the Superfund Program, so far: a Preliminary Assessment and Site Investigation ("PA/SI") in order to gain a basic understanding of any risks posed to human health and/or the environment by releases or threatened releases from the Site.

Due to the presence of hazardous substances at the Site, and in light of other factors, EPA has determined that there is an imminent and substantial endangerment to public health, welfare, or the environment. In response, EPA plans to conduct the following immediate removal activities at the Site: 1) site security as necessary based on conditions; 2) additional sampling as needed, to determine the extent of contamination; 3) air monitoring as needed; 4) lab pack chemicals located in metallurgy laboratory; 5) collect and consolidate accessible friable asbestos in degrading condition located inside and around the buildings; 6) conduct hazardous categorization of drums/containers/pits/trough contents; 7) remove contaminated liquid/solid/sludge areas

inside the buildings and stage for transportation; 8) pump out the contaminants from any vats or tanks and then neutralize, clean and disable those containers so they are no longer usable; 9) consolidate/over-pack and stage containers of hazardous substances; 10) remove and dispose of the identified drums, containers and ACM; 11) perform any additional sampling, analysis, characterization, neutralization, bulking or overpacking, and removal of hazardous substances as necessary; 12) identify and characterize waste streams and develop waste disposal profiles; 13) provide transportation and disposal of hazardous substances at CERCLA-approved-off-site disposal and recycling facilities in a safe and as cost-effective manner as possible; and 14) repair response-related damage.

INVITATION TO PERFORM SITE RESPONSE ACTIVITIES

Before EPA spends additional public funds to undertake the removal action at the Site, EPA urges you to participate in removal activities or finance all the removal activities outlined above. Any such work performed by you in your capacity as a PRP may be conducted pursuant to an administrative order and an EPA-approved work plan as authorized by Section 106(a) of CERCLA, 42 U.S.C. § 9606(a). Prior to final issuance of such an order, a draft order would be sent to you or your representative for review and comment. Enclosed is a copy of a summary of a generic Scope of Work (Enclosure 1). This document should-provide an understanding of the types of plans and activities typically required by such an Order.

Be advised that even if you do not indicate a willingness to perform or finance necessary response actions, EPA explicitly reserves any rights it may have to order you to undertake such actions under Section 106 of CERCLA, 42 U.S.C. § 9606. Failure to comply with a Section 106(a) administrative order may result in a fine of up to fifty-four thousand seven hundred eighty-nine dollars ($54,789) per day under Section 106(b) or imposition of treble damages under Section 107(c) (3) of CERCLA. Further, you may be held liable under Section 107(a) for the cost of the response activities EPA performs at the Site and for any damages to natural resources. In addition, by virtue of Section 113 of CERCLA, 42 U.S.C. § 9613, other PRPs who agree to perform the necessary response action may seek contribution protection.

FINANCIAL CONCERNS/ABILITY TO PAY SETTLEMENTS

EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a Site may be substantially limited. If you believe, and can document, that you fall within that category, please contact Tina Hennessy or Michelle Lauterback at the addresses below for information on "Ability to Pay Settlements." In response, you will receive a package of information about the potential for such settlements. You will be asked to fill out form(s) about your finances and to submit financial records including business federal and state income tax returns. If EPA concludes that you have a legitimate inability to pay the full amount of EPA's costs, EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

In the event you intend to or have already filed for dissolution or reorganization under bankruptcy laws, you are hereby requested to include EPA-Region 1 on any mailing or notice lists used in that proceeding. The United States reserves the right to file a proof of claim or application for reimbursement of administrative expenses in such a proceeding.

PRP RESPONSE AND EPA CONTACT

You should contact EPA within **seven (7) business days** after receipt of this letter to indicate your willingness to perform or finance the response activities outlined above. If EPA does not receive a response within that time, EPA will assume that you do not wish to negotiate a resolution of your liabilities in connection with the response and that you have declined any involvement in performing response activities. Be advised, however, that liability under CERCLA is joint and several; therefore, each PRP is potentially liable for undertaking all response actions or reimbursing the Government for the entire amount of its response costs.

Please provide the name, address, and telephone number of a designated contact for future communications. Your written response, including any technical comments or questions concerning the proposed response activities, should be directed to the EPA On-Scene Coordinator ("OSC") or the Enforcement Coordinator ("EC") for the Site:

Allen Jarrell, OSC
U.S. Environmental Protection Agency
Emergency Response & Removal Section 1 (OSRR02-2)
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
TEL (617) 918-1314
FAX (617) 918-031

Tina Hennessy, EC
U.S. Environmental Protection Agency
Emergency Response & Removal Section 1 (OSRR02-2)
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
TEL (617) 918-1216
FAX (617) 918-0216

Legal questions and all communications from counsel should be directed to:

Michelle Lauterback, Senior Enforcement Counsel
U.S. Environmental Protection Agency
Office of Environmental Stewardship (OES04-3)

5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
TEL (617) 918-1774
FAX (617) 918-0774

DECISION NOT TO USE SPECIAL NOTICE

Under Section 122(e) of CERCLA, 42 U.S.C. § 9622(e), EPA has the discretionary authority to invoke special notice procedures to formally negotiate the terms of an agreement between EPA and the PRPs to conduct or finance response activities. The use of special notice procedures triggers a moratorium on certain EPA activities at the Site while formal negotiations between EPA and the PRPs are conducted.

Due to the exigencies posed by conditions present at the Site, removal activities must be conducted as expeditiously as possible. EPA has, therefore, decided not to invoke the Section 122(e) special notice procedures with respect to CERCLA removal actions at this Site. Nonetheless, EPA is willing to discuss settlement opportunities without invoking a moratorium, but will continue the response action as planned unless such discussions lead expeditiously to a settlement.

ADMINISTRATIVE RECORD

Pursuant to Section 113(k) of CERCLA, 42 U.S.C. § 9613(k), EPA will establish an administrative record containing documents that serve as the basis of EPA's decision on the selection of a cleanup action for the Site. The Administrative Record files may be inspected and comments may be submitted by contacting the OSC for the Site, Allen Jarrell, at the above address.

The Administrative Record Files with corresponding index should be available for inspection at a repository near the Site within sixty (60) days of initiation of on-site removal activities, as well as the Superfund Records Center, U.S.E.P.A., 5 Post Office Square, Suite 100, Boston, MA 02109, (617) 918-1440.

INFORMATION TO ASSIST YOU

EPA would like to encourage communication between you, other PRPs, and EPA concerning the Site. A notice of potential liability has also been sent to Ansonia Copper & Brass, Inc. EPA has notified this party that you have been also been identified as a PRP. You or your attorney may wish to discuss the matters set forth in this letter with such party or its attorney.

SITE ACTIVITY OUTSIDE EPA ACTIONS

If you are already involved in discussions with state or other local authorities or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise or direct you to restrict or discontinue any such activities. However, you are advised to report the status of any such discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions.

CONSENT TO ACCESS

EPA hereby requests access to the Site through your written consent, so that EPA can perform or oversee the response actions discussed above. This request is enclosed.

RESOURCES AND INFORMATION FOR SMALL BUSINESSES

On January 11, 2002, the Superfund Small Business Liability Relief and Brownfields Revitalization Act was enacted. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may download a copy of the law from www.epa.gov/brownfields/brownfields-laws-and-regulations and review EPA guidance regarding these exemptions at https://www.epa.gov/enforcement/defenses-and-exemptions-superfund-liability.

EPA has created a number of helpful resources for small businesses. EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at www.epa.gov/smallbusiness. In addition, the EPA Small Business Ombudsman may be contacted at www.epa.gov/aboutepa/about-office-small-and-disadvantaged-business-utilization-osdbu. Finally, EPA developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act ("SBREFA"), which is also enclosed with this letter.

PURPOSE AND USE OF THIS NOTICE

The factual and legal discussions contained in this letter are intended solely to provide notice and information. Such discussions are not intended to be, and cannot be, relied upon as EPA's final position on any matter set forth herein.

Please give these matters your immediate attention and consider consulting with an attorney. If you have any questions regarding this letter, please contact either Michelle Lauterback or Tina Hennessy at the telephone numbers referenced above.

By copy of this letter, EPA is notifying the State of Connecticut and the Natural Resources Trustees of EPA's intent to perform, or to enter into negotiations for the performance or financing of, response actions at the Site.

Thank you for your attention to this matter.

Sincerely,

Carol Tucker, Chief
Emergency Planning and Response Branch

Enclosures

cc: Dave Poynton, CTDEEP
Andrew Raddant, Regional Environmental Officer - U.S. DOI
Ken Finkelstein, National Oceanic & Atmospheric Administration - NOAA
Allen Jarrell, EPA On-Scene Coordinator – OSRR02-2
Tina Hennessy, EPA Enforcement Coordinator – OSRR02-2
Michelle Lauterback, EPA Senior Enforcement Counsel – OES04-3
Holly Inglis, EPA Records Center – OSRR01-5
Patti Ludwig, EPA CERCLIS Coordinator – OSRR01-5
Raymond McGee, Ansonia Copper & Brass, Inc.

SUMMARY OF GENERIC SCOPE OF WORK

This summary of the Generic Scope of Work is provided for informational purposes only. More detailed provisions will be set forth in the site-specific Scope of Work. Provisions may vary from site to site.

When EPA determines that a Potentially Responsible Party (PRP) has the ability to promptly and properly prevent, mitigate, or eliminate the threats posed by hazardous substances at the Site, EPA may issue an Administrative Order (Order) to such party (the Respondent) with an attached Scope of Work (SOW). The Order and SOW, among other things, compel the Respondent to develop a plan to clean up the Site. The components of the plan (also called a "deliverable") must be submitted to EPA for approval before implementation. Detailed instructions for generating each component shall be provided in the SOW. The plan shall consist of the components listed below.

1) **Site Security** - The Respondent shall provide on-site security service. Site security shall be maintained until EPA determines the threats posed by conditions at the Site are eliminated or substantially mitigated.

2) **Notification of Contractor Selection** - The Respondent shall notify EPA of the proposed cleanup contractor selected to perform work required under the Order.

3) **Site-Specific Health and Safety Plan (HASP) -** The Respondent shall develop and implement a HASP for all activities to be conducted at the Site. The HASP shall be developed to protect all on-site personnel and must comply with all applicable health and safety regulations.

4) **Quality Assurance Plan (QAP) -** The Respondent shall develop a QAP to be utilized in conducting all field and laboratory analysis. The QAP shall ensure that analytical results generated are of known quality.

5) **Site Assessment Plan (SAP)** - The Respondent shall develop a SAP specifying the overall strategy of the field investigative work necessary to characterize site contamination.

6) **Site Assessment** - A Site Assessment shall be conducted following EPA approval of the SAP.

7) **Site Assessment Report and Cleanup Plan (SAR/CP)** - Following completion of the Site Assessment, the Respondent shall develop a SAR/CP that summarizes the Site Assessment and proposes cleanup methods necessary to substantially mitigate and/or eliminate the threats posed by hazardous substances present at the Site.

8) **Site Cleanup** - The Site Cleanup shall be conducted according to the EPA approved Cleanup Plan.

9) **Completion of Work Report (CWR)** - Upon completion of the Site Cleanup, the Respondent shall submit a CWR summarizing the work performed under the Order and SOW and outlining any remaining contamination.

At any time prior to or after the completion of the work specified in this SOW, EPA may determine that additional tasks are necessary in order to achieve the objectives of the Order, the SOW and CERCLA.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109

ATTN: OSC Allen Jarrell (OSRR02-2)

CONSENT FOR ACCESS TO PROPERTY FOR A REMOVAL ACTION

SITE NAME: Liberty Street Ansonia Copper & Brass Site

OPERATOR NAME: Ansonia Specialty Metals, LLC

LOCATION OF PROPERTY: 75 Liberty Street (Parcel ID 03300190000)
7 Riverside Drive (Parcel ID 03500010004)

I (We), consent to the officers, employees, agents, contractors, subcontractors, consultants, and other authorized representatives of the United States Environmental Protection Agency ("EPA") entering and having continued access to the above-referenced property for the following purpose(s):

- Performing removal actions, or overseeing potentially responsible parties performing removal actions, to mitigate the hazards posed by hazardous substances, pollutants and contaminants that were released, or pose a substantial threat of release, at the Site, including: 1) site security as necessary based on conditions; 2) additional sampling as needed, to determine the extent of contamination; 3) air monitoring as needed; 4) lab pack chemicals located in metallurgy laboratory; 5) collect and consolidate accessible friable asbestos in degrading condition located inside and around the buildings; 6) conduct hazardous categorization of drums/containers/pits/trough contents; 7) remove contaminated liquid/solid/sludge areas inside the buildings and stage for transportation; 8) pump out the contaminants from any vats or tanks and then neutralize, clean and disable those containers so they are no longer usable; 9) consolidate/over-pack and stage containers of hazardous substances; 10) remove and dispose of the identified drums, containers and ACM; 11) perform any additional sampling, analysis, characterization, neutralization, bulking or overpacking, and removal of hazardous substances as necessary; 12) identify and characterize waste streams and develop waste disposal profiles; 13) provide transportation and disposal of hazardous substances at CERCLA-approved-off-site disposal and recycling facilities in a safe and as cost-effective manner as possible; and 14) repair response-related damage.

- Taking any other response actions or evaluating the need to take other response actions.

I (We) understand that a representative of the company may accompany EPA or its representatives during the removal action and I (we) agree that our representatives will not interfere in any way with conduct of the removal action. However, this Consent for Access is not contingent on a representative accompanying EPA or its representatives during the removal action.

I (we) realize that these actions are undertaken under EPA's response and enforcement authorities under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601 et seq.

I (We) give this written permission voluntarily with knowledge of my (our) right to refuse, and without threats or promises of any kind.

CONSENT OF OPERATOR(S)

_____ _____
Date Signature of Operator/Operator's Authorized Representative

Printed Name: _____

Title: _____

Address: _____

_____

Phone: _____

Email: _____

(Attach additional sheets if necessary)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
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FREQUENTLY ASKED QUESTIONS ABOUT REQUESTS FOR ACCESS FOR PRELIMINARY ASSESSMENTS & SITE INVESTIGATIONS ("PA/SIs") AND OTHER REMOVAL ACTIONS BY THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY ("EPA")

EPA has frequently been asked the following questions regarding access to property for PA/SIs and other types of Removal Actions. We hope these answers assist you.

1. What type of work will be done on my property?

PA/SIs and other types of removal actions are usually done by an EPA contractor under the direction of the EPA On-Scene Coordinator (the "OSC"). Generally, the OSC and the contractor will walk around the property to get an overview of the area and collect a small number of water, sediment, or soil samples. In most cases, sampling is done with a hand auger or similar hand-held sampling device, and heavy equipment is not used. Sometimes, it is necessary to drive vehicles onto the property. It may also be necessary to take photographs of the property before work begins or during the sampling activities. Unless there is some unusual circumstance, the work is performed during normal business hours.

2. How long with EPA be on my property?

A typical PA/SI will take 1-2 days to complete. The initial site reconnaissance may take several hours. A return visit to perform sampling could require a full day or more. Other types of removal actions can take up to several months to perform.

3. Can I be there when EPA is on the property?

Yes, you or your representative may observe the work. However, you may not interfere with the work and your presence may not be a condition for the work to take place.

4. Will the property be changed or damaged in some way?

The work that EPA will be doing will not change or damage the property. It is EPA's policy to leave the property in the same condition as before EPA entered, whenever practicable. Should something happen to the property as a result of EPA's actions, EPA's contractors are required to carry comprehensive general liability insurance. In addition, the protections of the Federal Tort Claims Act would also apply.

5. Do I have to allow EPA onto my property?

The Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), also known as Superfund, gives EPA the right to enter your property if it has a reasonable basis to believe that there is a release or threat of release of hazardous substances on your property. This access authority extends to properties adjacent to existing Superfund sites, as well as to the sites themselves.

6. Can I get a release from liability or indemnification from EPA?

No. EPA's right to access to conduct the PA/SI or other types of removal actions may not be conditioned on the Agency giving up any legal claims which it might have against the property owner. EPA also cannot agree to indemnify an owner for damages caused by EPA or its contractor. Indemnification by EPA is a violation of the Anti-Deficiency Act and illegal for EPA to provide.

7. Can I get copies of any reports EPA prepares about the property?

Yes. You will be given copies of the final PA/SI reports and Removal Action Reports. You may also receive copies of any data which has already gone through the sampling analysis quality assurance and quality control process. You may also receive, upon request a portion of the samples which were collected and which you may have analyzed at your own expense.

8. Will EPA give me notice before coming onto my property?

It is EPA's practice to provide advance notice of property access whenever practicable. However, in the event of any emergency, EPA will require immediate access to the property.

9. What will happen if I do not agree to give EPA access?

If EPA determines that it is necessary to obtain access at this time, CERCLA allows EPA to issue an administrative order requiring you to provide access, or EPA may request that the U.S. Department of Justice seek a warrant or judicial order for access from the U.S. District Court. The Department of Justice has been successful in obtaining warrants or judicial orders in the past.

Office of Enforcement and Compliance Assurance
EPA-300-B-17-001 June 2017

U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

Office of Small and Disadvantaged Business Utilization (OSDBU)
www.epa.gov/aboutepa/about-office-small-and-disadvantaged-business-utilization-osdbu

EPA's OSBBU advocates and advances business, regulatory, and environmental compliance concerns of small and socio-economically disadvantaged businesses.

EPA's Asbestos Small Business Ombudsman (ASBO)
www.epa.gov/resources-small-businesses/asbestos-small-business-ombudsman or 1-800-368-5888

The EPA ASBO serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

Small Business Environmental Assistance Program
https://nationalsbeap.org

This program provides a "one-stop shop" for small businesses and assistance providers seeking information on a wide range of environmental topics and state-specific environmental compliance assistance resources.

EPA's Compliance Assistance Homepage
www.epa.gov/compliance

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

Compliance Assistance Centers
www.complianceassistance.net

EPA sponsored Compliance Assistance Centers provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture
www.epa.gov/agriculture

Automotive Recycling
www.ecarcenter.org

Automotive Service and Repair
www.ccar-greenlink.org or 1-888-GRN-LINK

Chemical Manufacturing
www.chemalliance.org

Construction
www.cicacenter.org

Education
www.campuserc.org

Food Processing
www.fpeac.org

Healthcare
www.hercenter.org

Local Government
www.lgean.org

Surface Finishing
http://www.sterc.org

Paints and Coatings
www.paintcenter.org

Printing
www.pneac.org

Ports
www.portcompliance.org

Transportation
www.tercenter.org

U.S. Border Compliance and Import/Export Issues
www.bordercenter.org

EPA Hotlines and Clearinghouses
www.epa.gov/home/epa-hotlines

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Examples include:

Clean Air Technology Center (CATC) Info-line
www.epa.gov/catc or 1-919-541-0800

Superfund, TRI, EPCRA, RMP, and Oil Information Center
1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline
www.epa.gov/otaq/imports or 1-734-214-4100

National Pesticide Information Center
www.npic.orst.edu or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills - http://nrc.uscg.mil or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC) - www.epa.gov/p2/pollution-prevention-resources#ppic or 1-202-566-0799

Safe Drinking Water Hotline - www.epa.gov/ground-water-and-drinking-water/safe-drinking-water-hotline or 1-800-426-4791

Toxic Substances Control Act (TSCA) Hotline
tsca-hotline@epa.gov or 1-202-554-1404

Small Entity Compliance Guides
https://www.epa.gov/reg-flex/small-entity-compliance-guides

EPA publishes a Small Entity Compliance Guide (SECG) for every rule for which the Agency has prepared a final regulatory flexibility analysis, in accordance with Section 604 of the Regulatory Flexibility Act (RFA).

Regional Small Business Liaisons
www.epa.gov/resources-small-businesses/epa-regional-office-small-business-liaisons

The U.S. Environmental Protection Agency (EPA) Regional Small Business Liaison (RSBL) is the primary regional contact and often the expert on small business assistance, advocacy, and outreach. The RSBL is the regional voice for the EPA Asbestos and Small Business Ombudsman (ASBO).

State Resource Locators
www.envcap.org/statetools

The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

State Small Business Environmental Assistance Programs (SBEAPs)
https://nationalsbeap.org/states/list

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits.

EPA's Tribal Portal
www.epa.gov/tribalportal

The Portal helps users locate tribal-related information within EPA and other federal agencies.

EPA Compliance Incentives
EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two such policies that may apply to small businesses:

EPA's Small Business Compliance Policy
www.epa.gov/enforcement/small-businesses-and-enforcement

EPA's Audit Policy
www.epa.gov/compliance/epas-audit-policy

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply

If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.