ReedSmith

**Phillip Babich**
Direct Phone: +1 415 659 5654
Mobile: +1 213 999 5749
Email: pbabich@reedsmith.com

Reed Smith LLP
101 Second Street
Suite 1800
San Francisco, CA 94105-3659
Tel +1 415 543 8700
Fax +1 415 391 8269
reedsmith.com

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**By Certified Mail**

Regional Freedom of Information Officer
U.S. EPA, Region 9
75 Hawthorne Street (OPA-2)
San Francisco, CA 94105

**Freedom of Information Act (FOIA) Request**

Dear FOIA Officer:

Pursuant to the Freedom of Information Act (the "Act"), 5 U.S.C. § 552, we respectfully request DOCUMENTS[1] as described in the listed categories below. For purposes of this FOIA request, the following definitions apply:

ENVIRONMENTAL CONTAMINANTS means pollutants, the discharge of which would be in violation of the General Industrial Permit under the Clean Water Act and implementing regulations (33 U.S.C. §§ 1311(a) and 1242; 40 C.F.R § 125).

ECHO means the EPA's Enforcement and Compliance History Online website.

EPA means the U.S. Environmental Protection Agency.

GKN FACILITY means the facility located at 1150 W. Bradley Avenue, El Cajon, California 92020, operated by GKN Chem Tronics Incorporated with FRS ID number 110000478536.

NOI means the Notice of Intent to Comply with the General Permit to Discharge Storm Water Associated with Industrial Activity.

NPDES means National Pollution Discharge Elimination System (40 C.F.R. § 125).

RCRA means the Resource Conservation and Recovery Act (42 U.S.C. §§ 6901 *et seq.*).

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[1] DOCUMENT" shall have the broadest meaning permissible pursuant to the Cal. Evid. Code § 250 and shall mean and refer to all written, recorded, or graphic matter, including, but not limited to, all writings and records of every type and description including, but not limited to, contracts, agreements, correspondence, memoranda, letters, facsimiles, electronic ("E") mail, records of telephone conversations, handwritten and typewritten notes of any kind, statements, reports, minutes, recordings, transcripts and summaries of meetings, voice recordings, pictures, photographs, drawings, computer cards, tapes, discs, printouts and records of all types, studies, instruction manuals, policy manuals and statements, books, pamphlets, invoices, canceled checks and every other device or medium by which or through which information of any type is transmitted, recorded, or preserved. The term also means a copy where the original is not in your possession, custody or control and every copy of any document if such copy is not an identical duplicate of the original. A DOCUMENT with handwritten notes, editing marks, etc., shall not be deemed a duplicate identical to one without such notes or marks.

SWPPP means Storm Water Pollution Prevention Plan

**Requests**

1. Copies of any and all permit applications for the GKN FACILITY, including but not limited to the NOI for the facility.

2. Copies of any and all permits issued to or for the GKN FACILITY, including, but not limited to the NPDES permit for the facility.

3. DOCUMENTS related to governmental and/or regulatory inspections of the GKN FACILITY for ENVIRONMENTAL CONTAMINANTS.

4. DOCUMENTS related to ENVIRONMENTAL CONTAMINANTS at the GKN Facility.

5. DOCUMENTS related to RCRA violations by and/or at the GKN FACILITY, including, but not limited to, those violations referenced in the Detailed Facility Report for the GKN FACILITY on ECHO with RCRA source ID number CAD990845513.

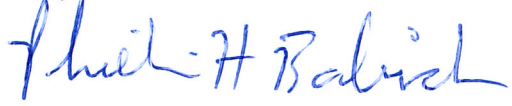
6. DOCUMENTS related to hazardous waste and/or hazardous materials at or generated by the GKN FACILITY.

7. DOCUMENTS related to any and all emergency notifications for releases of hazardous substances and/or hazardous materials at or by the GKN FACILITY, including, but not limited to, such notifications given under the Emergency Planning and Community Right-To-Know Act ("EPCRTKA"), 42 U.S.C. §§ 11001 *et seq*.

8. DOCUMENTS related to any and all data sheets and forms for hazardous and/or toxic chemicals at or released by the GKN FACILITY, including, but not limited to, such data sheets and forms submitted or provided under EPCRTKA's reporting requirements, 42 U.S.C. §§ 11021–11023.

The Act allows you twenty business days in which to comply with this request. Please contact me regarding anticipated fees associated with this request and I will promptly remit payment. To the extent it is easier for you, we would be willing to discuss receipt of DOCUMENTS in an electronic format. Alternatively, we are open to discussing whether it would be more expedient if we come to EPA's offices to review potentially responsive DOCUMENTS and/or use our own photocopy service to copy certain DOCUMENTS. Please contact me if you have any questions or if I can help to further narrow the focus of your response. Thank you in advance for your time and attention to this matter.

Sincerely,



Phillip Babich

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