New Cassel/Hicksville Ground Water Contamination Superfund Site
Located in Towns of Hempstead, North Hempstead and Oyster Bay, NC, New York

INSTRUCTIONS FOR RESPONDING TO REQUEST FOR INFORMATION

A. Directions

1. A complete and separate response should be given for each question.

2. Identify each answer with the number of the question to which it is addressed.

3. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the question to which it applies.

4. In preparing your response to each question, consult with all present and former employees and agents of the Company whom you have reason to believe may be familiar with the matter to which the question pertains.

5. In answering each question, identify each individual and any other source of information (including documents) that was consulted in the preparation of the response to the question.

6. If you are unable to give a detailed and complete answer, or to provide any of the information or documents requested, indicate the reason for your inability to do so.

7. If you have reason to believe that an individual other than one employed by the Company may be able to provide additional details or documentation in response to any question, state that person's name, last known address, phone number and the reasons for your belief.

8. If a document is requested but not available, state the reason for its unavailability. To the best of your ability, identify the document by author, date, subject matter, number of pages, and all recipients of the document with their addresses.

9. If anything is omitted from a document produced in response to this Request for Information, state the reason for, and the subject matter of, the omission.

10. If you cannot provide a precise answer to a question, please approximate but, in any such instance, state the reason for your inability to be more specific.

11. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential business 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).

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If you make a claim of confidentiality for any of the information you submit to EPA, you must prove that claim. For each document or response you claim to be confidential, you must separately address the following points:

a. the portions of the information which are alleged to be entitled to confidential treatment;

b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);

c. measures taken by you to guard against the undesired disclosure of the information to others;

d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;

e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and

f. whether you assert that disclosure of the information would be likely to result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be; why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

To make a confidentiality claim, please stamp, or type, "Confidential" on all confidential responses and any related confidential documents. Confidential portions of otherwise non-confidential documents should be clearly identified. Please submit your response so that all non-confidential information, including any redacted versions of documents, are in one envelope and all materials for which you desire confidential treatment are in another envelope.

All confidentiality claims are subject to EPA verification. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information, that you intend to continue to do so, and that the information is not and has not been obtainable by legitimate means without your consent. Information covered by such a claim will be disclosed by EPA only to the extent permitted by Section 104(e) of CERCLA and 40 C.F.R. Part 2, Subpart B. If no such claim accompanies the information when it is received by EPA, then it may be made available to the public by EPA without further notice to you.

B. Definitions

1. The terms "and" as well as "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these questions any information which might otherwise be construed to be outside of their scope.

2. The term "arrangement" means every separate contract or other agreement between two or more persons.

3. As used herein, and unless otherwise stated, the term "Company" refers to the addressee of this letter or any company, partnership, business, and/or other entity related in any way to the addressee. The term refers to the Company as it is currently constituted, as well as all predecessors and successors in interest of the Company and all subsidiaries, divisions, affiliates, and branches of the Company or of its predecessors or successors.

4. The terms "document" and "documents" shall include writings of any kind, formal or informal, whether or not wholly or partially in handwriting, and electronic communications, including by way of illustration and not by way of limitation any email, letter, memorandum of conversations, meetings, or intra-office communication, and any agreements, contracts, invoices, bills of lading and manifests.

5. As used herein, the term "Facility" shall mean the Sylvania Corning Plant/former Sylvania Electric Products facility, an approximately 9.49 acre area divided into three separate properties currently located at 70, 100 and 140 Cantiague Rock Road in the Town of Oyster Bay, and within the area of the New Cassel/Hicksville Ground Water Contamination Superfund Site.

6. The term "identify" with respect to a natural person means to set forth the person's name, present and/or last known business address and business telephone number, present and/or last known home address and home telephone number, and present and/or last known job title, position, or business.

7. The term "identify" with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship) means to set forth its full name, address, legal form (e.g. corporation, partnership, etc.), organization, if any, and a brief description of its business.

8. The term "identify" with respect to a document means to provide its customary business description, its date, its number if any (e.g. invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.

9. As used herein the term "person" shall have the meaning set forth in Section 101(21) of CERCLA, 42 U.S.C. § 9601(21).

10. As used herein, the term "the Property" shall mean and include any property within the Site that the Company (1) presently owns or formerly owned at any time or (2) where the Company presently operates or formerly operated a Facility at the Site.

11. The term “Site” shall mean and include the area known as the New Cassel/Hicksville Ground Water Contamination (“NCHGWC”) Superfund Site. The NCHGWC Site comprises a widespread area of groundwater contamination which is located in the Towns of Hempstead, North Hempstead and Oyster Bay, New York.

12. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or the Resource Conservation and Recovery Act, in which case the statutory definitions shall apply.

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REQUEST FOR INFORMATION

1. a. State the correct legal name and mailing address of your Company.

   b. State the name(s) and address(es) of the President, Chief Executive Officer and the Chairman of the Board (or other presiding officer) of the Company.

   c. Identify the state and date of incorporation of the Company and the Company's agents for service of process in the state of incorporation, and in New York State.

   d. If your Company is a subsidiary or affiliate of another corporation or entity, identify each of those other corporations or entities and for each, the President, Chief Executive Officer and Chairman of the Board. Identify the state of incorporation and agents for service of process in the state of incorporation and in New York State for each corporation identified in your response to this question.

   e. If your Company is a successor to or has been preceded by another entity, identify such other entity and provide the same information as requested in 1.d., above.

2. Identify the address, Section, Block and Lot numbers, and the size of each property (hereinafter, "Property" or "Properties") that your Company either presently owns and/or formerly owned within the Site from the date your Company, or any related company had an ownership interest. (*See* Definitions section for terms.)

3. For each Property identified in response to question 2. in which your Company has and/or had an ownership interest currently or in the past, please identify:

   b. The date your Company acquired an ownership interest. An ownership interest includes, but is not limited to, fee owner, lessor or lessee, licensee and/or operator;

   c. The name and address of all other current and/or previous owners;

   d. All individuals or entities that have leased, subleased or otherwise operated at each Property at any time currently or in the past, and identify the dates (month and year) that each such individual or entity began and ended its leasehold interest or its operations;

   e. Any portion of any Property which was transferred or sold, and the block and lot number, the date of the transfer or sale, the sale price and the entity that acquired the Property;

   f. The relationship, if any, between your Company and each of the individuals and/or other entities identified as having leased or operated at each Property;

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g. The degree of your Company's involvement in all operations conducted by each lessee and/or other individual or entity identified in response to question 3c., above; and

h. For each Property, all documents relevant to your responses to questions 3a.- 3f., above, and provide copies, including, but not limited to, copies of surveys, title search documents, deeds, rent rolls, leases and correspondence.

5. Provide copies of all maps, building plans, floor plans and/or drawings for each Property identified in response to question 2. above. Your response to this question should include, but not be limited to existing and/or former plumbing, drainage system plans, waste-water discharge areas, tunnel sumps, dry wells, septic systems and waste lagoons in proximity to or within all structures on each Property.

5. For each Property identified in question 2., above, describe in detail the manufacturing processes and/or other operations that the Company conducted at the Property, and the years of operations. If those operations changed through the years, describe the nature of all changes, and state the year of each change. If detailed information about the Company's operations is not available, provide, at a minimum, a general description of the nature the business operations at the Property, the years of operation, the type of work conducted, and the number of employees for all the operations.

6. With respect to hazardous substances, hazardous wastes and industrial wastes at the Property, list all hazardous substances, hazardous wastes and industrial wastes that were used, stored, generated, handled or received at the Property. Your response to this question should include, but not be limited to, use, storage, generation and/or handling of trichloroethylene ("TCE"), tetrachloroethylene ("PCE"), 1,1,1-trichloroethane ("1,1,1-TCA") and other chlorinated or non-chlorinated solvents, as well as those substances listed on the chart below. Be as specific as possible in identifying each chemical, and provide, among other things, the chemical name, brand name, and chemical content.

7. State when each hazardous substance, hazardous waste and industrial waste identified in your response to question 6, above, was used, stored, generated, handled or received, and state the volume of each hazardous substance, hazardous waste and industrial waste used, stored, generated and/or handled on an annual basis. If you do not have exact volumes, estimate, and explain the basis for your estimate.

8. Describe the activity or activities in which each hazardous substance, hazardous waste and industrial waste identified in your response to question 6, above, was used, stored, handled or received.

9. For each substance listed in the chart below, state whether it was detected in sampling performed at the Property at any time. If your answer is Yes, on a separate sheet, provide the identity of the study, the investigator, the date of the study, specifically where on the Property and by whom the sampling was performed.

Substance	Yes or No
Trichloroethylene (TCE)	
Tetrachloroethylene (PCE)	
Cis-1,2-dichloroethylene	
1,1-dichloroethylene	
1,1,1-trichloroethane (1,1,1-TCA)	
1,4 Dioxane	
Carbon Tetrachloride	
Chlorobenzene	
Benzene	
1,2 – dichlorobenzene	
Methyl ethyl ketone (2-butanone)	
Bis (2 ethyl hexyl) phthalate and Butyl phthalate	
Chromium	
Trivalent Chromium	
Hexavalent Chromium	
Vinyl Chloride	
Arsenic	
Barium	
Cadmium	
Chloride	
Copper	
Ferrous Iron and Total Iron	
Lead	
Manganese	
Mercury	
Nickel	
Beryllium	
Radionuclides Uranium and Thorium	
Zinc	

10. Describe in detail how and where the hazardous substances, hazardous wastes and industrial wastes identified in response to question 6., above, were disposed. For each disposal location and method, state the nature and quantity of the material disposed of on an annual basis. For those time periods when a precise quantity is not available, provide an estimate and the basis for the estimate. Provide manifests for disposal, if available.

11. Describe where drummed wastes were staged on the Property. If drums were buried on the Property, identify where they were buried. If buried drums were excavated and removed, identify the locations of the drum removal. Provide an inventory of the number of drums, the contents of the drums and disposal site for such drums. For drums disposed of offProperty, provide manifests for their disposal.

12. State the number and the locations of the underground storage tanks ("UST") at the Property from the 1950s to the present. For each UST, state whether it was used for storage of product, storage or treatment of hazardous waste and/or industrial waste. State whether the USTs were in compliance with the hazardous waste regulations set forth in 40 C.F.R. Part 264/265. If any USTs contained petroleum product, state whether they were in compliance with the regulations at 40 C.F.R. Part 280.

13. Provide a summary listing of environmental assessments or studies, investigations, removal actions, remedial activities, or any other environmental work conducted by your Company or by any other party on your Company's behalf relating to hazardous substances, hazardous wastes and/or industrial wastes released at or from the Property and/or the Site. If any copies of the records requested in this question are available electronically, kindly submit your answer to this question on a hard drive or discs.

14. Describe in detail any knowledge your Company has about intentional or unintentional disposal of hazardous substances, hazardous wastes and/or industrial wastes at each Property identified in response to question 2. above. Your response should include instances in which hazardous substances, hazardous wastes and/or industrial wastes were spilled or otherwise disposed into lagoons, historic leach pools, or into or onto the ground from septic systems, pipes, drains, drums, tanks, or by any other means. Provide copies of all documents supporting to your response.

15. Identify all leaks, spills, or releases of any kind of any hazardous substances, hazardous wastes or industrial wastes (including, but not limited to, TCE and PCE or other chlorinated or non-chlorinated solvents or wastes containing such solvents) into the environment that have occurred, or may have occurred, at or from the Property, including any leaks or releases from drums and other containers. Provide copies of all documents supporting your response.

16. Explain whether any repairs or construction were implemented to address any leaks, spills, releases or threats of releases of any kind, the nature of the work and the dates of any such work.

17. Provide copies of all insurance policies held and indemnification agreements entered into by the Company which may potentially indemnify the Company against any liability which it may be found to have under CERCLA for releases and threatened releases of hazardous substances at

and from the Property. In response to this request, please provide not only those insurance policies and agreements which currently are in effect, but also those that were in effect during any period of time that the Company conducted operations at, or held a property interest in the Property.

18. State the names, telephone numbers and present or last known addresses of all individuals whom you have reason to believe may have knowledge, information or documents regarding the use, storage, generation, disposal of or handling of hazardous substances, hazardous wastes and industrial wastes at the Site, the transportation of such materials to the Site, or the identity of any companies whose material was treated or disposed of at the Site.

19. If you have information or documents which may help EPA identify other companies that conducted operations, owned property, or were responsible for the handling, use, storage, treatment, or disposal of hazardous substances, hazardous wastes or industrial wastes that potentially contributed to contamination of the New Cassel/Hicksville Ground Water Contamination Site, please provide that information and those documents, and identify the source(s) of your information.

20. Please state the name, title and address of each individual who assisted or was consulted in the preparation of your response to this Request for Information. In addition, state whether each person has personal knowledge of the answers provided.

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CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of _____

County of _____:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information regarding the New Cassel/Hicksville Site) and all documents submitted herewith, and that I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

_____
NAME (print or type)

_____
TITLE (print or type)

_____
SIGNATURE

Sworn to before me this

__ day of _____, 2013

_____
Notary Public

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