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February 4, 2016

Via Electronic and Regular Mail

Nicoletta M. DiForte
Emergency and Remedial Response Division
U.S. Environmental Protection Agency – Region II
290 Broadway, 19th Floor
New York, NY 10007-1866

Amy Chester
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency – Region II
290 Broadway, 16th Floor
New York, NY 10007-1866

Re: Saint-Gobain Performance Plastics Corporation
Request for Information Pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601 et seq.

Dear Ms. DiForte and Ms. Chester:

On behalf of my client Saint-Gobain Performance Plastics Corporation ("SGPP"), I write to thank you for agreeing to SGPP's request for an extension until February 17, 2016 for SGPP to respond to the United States Environmental Protection Agency's ("USEPA") request for information pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e) (the "104(e) Request"). As set forth in Ms. Chester's e-mail of February 1, 2016, the extension was conditioned upon SGPP providing to USEPA, by February 4, 2016, all sampling data that SGPP has related to Question Nos. 17, 19, 20, 21 and 23 of the 104(e) Request. That sampling data is enclosed.

Please note that in providing this sampling data, SGPP objects to the 104(e) Request to the extent the Request or its definitions require SGPP to produce information or documents or create responses containing information that are not required to be produced pursuant to Section 104(e) of CERCLA or other applicable law.

SGPP objects to the extent the 104(e) Request can be construed as asking for disclosure of privileged information or as requesting information of a kind and/or in a form not authorized by applicable law. SGPP claims any applicable privilege and objects to the 104(e) Request. Privileged documents are not being produced with this response and any inadvertent production of privileged material is not intended as a waiver of the applicable privilege.

SGPP further objects to the extent the 104(e) Request seeks information concerning operations and events taking place at the facilities by the prior owner/operators of those facilities.

SGPP further objects to the extent the 104(e) Request seeks information concerning other facilities that are or have been owned or operated by SGPP within a fifteen mile radius of Hoosick Falls, New York because there are two facilities falling within that criteria that are located in the State of Vermont, outside of USEPA Region 2 jurisdiction.

Please note that submission of the enclosed documents is not intended, and should not be construed, as an acknowledgment or admission of any responsibility, or liability of SGPP, its officers, directors, employees, agents or representatives, or as a waiver of any rights, privileges or defenses with respect thereto. SGPP reserves the right to object to the use, in whole or in part, of any document submitted herewith in any proceeding for any purpose. SGPP also reserves the right to supplement and amend the information provided.

Please feel free to contact me if you have any questions.

Very truly yours,

CHRISTOPHER R. GIBSON

Enclosure

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