PERKINS & TROTTER PLLC

JOHN F. PEISERICH†
jpeiserich@perkinstrotter.com

†Also licensed in Texas

A PROFESSIONAL LIMITED LIABILITY COMPANY
Attorneys and Counselors

POST OFFICE BOX 251618
LITTLE ROCK, ARKANSAS 72225-1618
www.perkinstrotter.com

Street Address
101 Morgan Keegan Drive, Suite A
Little Rock, Arkansas 72202

TEL 501-603-9000
FAX 501-603-0556

July 2, 2012

Via Electronic and U.S. Mail

Annette Cusher, P.E.
Arkansas Dept. of Environmental Quality
Hazardous Waste Division
5301 Northshore Drive
North Little Rock, AR 72118-5317
(501) 682-0744

Re: Quapaw Products LLC; Response to May 31, 2012 Correspondence

Dear Ms. Cusher:

Please accept this correspondence in response to your letter dated May 31, 2012, to our client Harcros Chemicals, Inc. ("Harcros"), following a site inspection of the former Cedar Chemical site in Helena-West Helena, Arkansas on April 27, 2012.

In response to **Item #1**, the asphalt on the leased premise has been repaired as suggested.

In response to **Item #2**, Harcros agrees that the "old lab"' building may not have been included in the RADD. However, while the lease agreement required Harcros to perform certain demolition included in the RADD, the original asbestos investigation was prepared for the entire site with the intent of completing further demolition not included in the RADD, should the need arise. This was provided in the notification and plan given to ADEQ relating to the RADD demolition work. Nonetheless, we will submit an additional notification for the "old lab" demolition as prescribed.

In response to **Item #3**, Harcros intends to abide by the lease agreement.

In response to **Item #4**, Harcros is currently working with Clean Harbors to dispose of some materials from the previous demolition that should have been removed during work related to the Cedar Chemical bankruptcy. Lab characterization work was completed for the materials and submitted to Clean Harbors for generation of the waste profile and disposal plan. Harcros will voluntarily cover the effort and costs related to this disposal as a good faith gesture as your tenant. In addition, Harcros will provide updates upon request.

In response to **Item #5**, this material was on site prior to the start of Harcros's tenancy. Harcros has verbally requested, on multiple occasions, that ADEQ either: (1)

direct the parties that generated this material to handle disposal, or (2) direct otherwise as to the disposition of this material. Harcros is willing to assist in this with manpower at no cost, but certainly should not be required to assume any other costs in doing as requested.

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

Sincerely yours,

PERKINS & TROTTER, PLLC

John F. Peiserich

cc: Dara Hall, ADEQ