Freedom INDUSTRIES

January 22, 2014

Onsite Inspector
West Virginia Department of Environmental Protection
Freedom Industries, Inc.
Charleston, WV

Dear Sir/Madam:

We are writing per Order No. 8033, which was hand delivered to Mr. Gary Southern at approximately 11:30 a.m. during an onsite meeting this morning. In pertinent part, Order No. 8033 provides that:

> By 4:00 p.m. on January 22, 2014, Freedom Industries, Inc. shall provide any and all information fully describing the composition of the materials spilled to the Elk River on January 9, 2014.

The purpose of this letter is to provide that information.

As you know, on January 9, 2014 Tank No. 396 leaked, and a portion of those leaked materials flowed into the Elk River. Our internal investigation indicates that immediately prior to the release, Tank No. 396 contained a blend of:

> Crude MCHM – this product is used by our customers in coal preparation plants, and is characterized in the Eastman Material Safety Data Sheet 150000014291 (Version 2.0, Revision Date 08/18/2011), a copy of which has been previously provided to DEP.
>
> PPH – this product is a hydrophobic glycol ether, and is characterized in the Dow chemical Material Safety Data Sheet Dowanol PPH, a copy of which has been previously provided to DEP.

PPH is added to the Crude MCHM to act as an "extender," in that the Crude MCHM is available in limited, sporadic quantities. At the time of the release on January 9th, the blend in Tank No. 396 after extensive calculation, was approximately 88.5% Crude MCHM, and 7.3% PPH, by Weight and 4.2 percent water by weight. Our records and internal investigations indicate that there were no other materials in Tank No. 396 at the time of release.

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We trust that this information satisfies our obligations under Order No. 8033.

Very Truly Yours,

Gary Southern, President
Freedom Industries, Inc.

cc: SW Regional Environmental Enforcement Office
P.O. Box 662
Teays, WV 25569

Chief Inspector
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