From: Jaikaran, Bianca
To: DeGeorge, R. Steven
Subject: RE: Horton Iron & Metal Site/Special Notice Letter
Date: Tuesday, July 23, 2019 12:46:00 PM
Attachments: image001.png

I'm so sorry – I think I confused you. I was saying that I could no longer locate the email in which you responded to me concerning the PRP Search Report Clawback request.

Thanks,
Bianca

From: DeGeorge, R. Steven <SDeGeorge@robinsonbradshaw.com>
Sent: Tuesday, July 23, 2019 11:55 AM
To: Jaikaran, Bianca <Jaikaran.Bianca@epa.gov>
Subject: RE: Horton Iron & Metal Site/Special Notice Letter

I just resent you the email and correct version of the letter. I hope you now have what you need, and I thank you again for your consideration.

From: Jaikaran, Bianca <Jaikaran.Bianca@epa.gov>
Sent: Tuesday, July 23, 2019 11:36 AM
To: DeGeorge, R. Steven <SDeGeorge@robinsonbradshaw.com>
Subject: RE: Horton Iron & Metal Site/Special Notice Letter

WARNING: External Email

If you don't mind, please resend your email concerning the PRP search report.

Thanks so much,
Bianca

From: DeGeorge, R. Steven <SDeGeorge@robinsonbradshaw.com>
Sent: Tuesday, July 23, 2019 10:47 AM
To: Jaikaran, Bianca <Jaikaran.Bianca@epa.gov>
Subject: RE: Horton Iron & Metal Site/Special Notice Letter

I did not mean to retract the text of any email, only the first version of the July 12 letter. Please let me know if you would like me to resend the email itself.

From: Jaikaran, Bianca <Jaikaran.Bianca@epa.gov>
Sent: Tuesday, July 23, 2019 10:31 AM
To: DeGeorge, R. Steven <SDeGeorge@robinsonbradshaw.com>
Subject: RE: Horton Iron & Metal Site/Special Notice Letter

WARNING: External Email

Thank you. I will delete the previous draft.

I believe you retracted the wrong email when you tried to retract the first version of the Special Notice response. I no longer see your email about the PRP search – did you mean to retract that one?

Thank you,

Bianca N. Jaikaran
Associate Regional Counsel
Office of Regional Counsel
U.S. EPA Region 4
61 Forsyth Street S.W.
Atlanta, GA 30303-8931
Direct: 404.562.9680
Fax: 404.562.8078
Jaikaran.Bianca@epa.gov

CONFIDENTIALITY NOTICE: This message is being sent by or on behalf of an attorney. It is intended exclusively for the individual(s) or entity(ies) to whom or to which it is addressed. This communication may contain information that is proprietary, privileged, or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by email and delete all copies of the message.

From: DeGeorge, R. Steven <SDeGeorge@robinsonbradshaw.com>
Sent: Tuesday, July 23, 2019 10:10 AM
To: Jaikaran, Bianca <Jaikaran.Bianca@epa.gov>
Subject: RE: Horton Iron & Metal Site/Special Notice Letter

Yes, this is the correct/final version of the letter. We appreciate your deletion of the draft version of the letter that was sent to you inadvertently.

Thank you very much for your consideration.

R. Steven DeGeorge
Robinson Bradshaw

t : 704.377.8380 | f : 704.373.3980
101 N. Tryon St., Suite 1900
Charlotte, NC 28246

sdegeorge@robinsonbradshaw.com | Bio
robinsonbradshaw.com

This email may contain material that is CONFIDENTIAL, PRIVILEGED and/or ATTORNEY WORK PRODUCT for the sole use of the intended recipient. Any review, reliance, distribution or forwarding by others without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.

From: Jaikaran, Bianca <Jaikaran.Bianca@epa.gov>
Sent: Tuesday, July 23, 2019 10:03 AM
To: DeGeorge, R. Steven <SDeGeorge@robinsonbradshaw.com>
Subject: FW: Horton Iron & Metal Site/Special Notice Letter

WARNING: External Email

Steven,

Please confirm that the attached letter is the correct letter that you are sending on behalf of Phillips 66 in response to EPA's Special Notice. If this one is correct, I will delete the other email received the same day.

Thank you,

Bianca N. Jaikaran
Associate Regional Counsel
Office of Regional Counsel
U.S. EPA Region 4
61 Forsyth Street S.W.
Atlanta, GA 30303-8931
Direct: 404.562.9680
Fax: 404.562.8078
Jaikaran.Bianca@epa.gov

CONFIDENTIALITY NOTICE: This message is being sent by or on behalf of an attorney. It is intended exclusively for the individual(s) or entity(ies) to whom or to which it is addressed. This communication may contain information that is proprietary, privileged, or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy, or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by email and delete all copies of the message.

From: DeGeorge, R. Steven <SDeGeorge@robinsonbradshaw.com>
Sent: Friday, July 12, 2019 7:01 PM
To: Jaikaran, Bianca <Jaikaran.Bianca@epa.gov>
Subject: Horton Iron & Metal Site/Special Notice Letter

Ms. Jaikaran: As you requested, attached is Phillips 66's revised response to EPA's Special Notice Letter, without reference to the PRP Search Report ("Report"). Although Phillips 66 wishes to maintain its constructive relationship with EPA concerning the Horton site, we are not certain that EPA's disclosure of the Report was an inadvertent disclosure of attorney work product. Therefore, we plan to retain a copy of the Report for now, although we will not

reference the Report in any outside communications until we resolve this issue. As we consider this question, we invite you to provide any authority you have supporting EPA's position. Please understand that Phillips 66 does not wish to be adversarial, but I'm sure you understand that it must protect its interests.

Thank you, and please call me if you have any further questions or concerns at this time.

R. Steven DeGeorge
Robinson Bradshaw

t : 704.377.8380 | f : 704.373.3980
101 N. Tryon St., Suite 1900
Charlotte, NC 28246

sdegeorge@robinsonbradshaw.com | Bio
robinsonbradshaw.com

This email may contain material that is CONFIDENTIAL, PRIVILEGED and/or ATTORNEY WORK PRODUCT for the sole use of the intended recipient. Any review, reliance, distribution or forwarding by others without express permission is strictly prohibited. If you are not the intended recipient, please contact the sender and delete all copies.