From: Jaikaran, Bianca
To: DeGeorge, R. Steven
Subject: RE: Horton Iron & Metal Site/Special Notice Letter
Date: Tuesday, July 23, 2019 10:31:00 AM
Attachments: image001.png

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

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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
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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
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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

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