From: Jaikaran, Bianca
To: SDeGeorge@robinsonbradshaw.com
Subject: FW: Horton Iron & Metal Site/Special Notice Letter
Date: Tuesday, July 23, 2019 10:02:00 AM
Attachments: Ltr to EPA.pdf
image001.png

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,

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U.S. EPA Region 4
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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

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