UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE – SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

URGENT LEGAL MATTER – PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

August 20, 2015

Jim Waters Corporation
Brian Stewart, Manager
15 Dewey Street
Bridgeport, CT 06605

Re: Notice of Potential Liability and Invitation to Perform or Finance Proposed Cleanup Activities for the Grant Street Fire Site, Bridgeport, CT

Dear Mr. Stewart:

This letter serves to notify Jim Waters Corporation ("you") of potential liability regarding the Grant Street Fire Site in Bridgeport, CT ("Site"), as defined by Section 107(a) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), commonly known as the federal "Superfund" law. This letter also notifies you of planned removal activities at the Site which you are invited to perform or finance, and which you may be ordered to perform at a later date.

NOTICE OF POTENTIAL LIABILITY

Under CERCLA, the United States Environmental Protection Agency ("EPA") is responsible for responding to the release or threat of release of hazardous substances, pollutants or contaminants into the environment, *i.e.*, for stopping further contamination from occurring and for cleaning up or otherwise addressing any contamination that has already occurred. EPA has documented that a release has occurred, and there is a threat of additional releases, at the Site located at 25 Grant Street, Bridgeport, Fairfield County, CT. The property is owned by 25 Grant Street, LLC and is fully described by the City of Bridgeport on MBLU 49/1804/3/K, and also identified on a deed recorded at the Bridgeport Clerk's Office in Book 5205, Page 317.

Hazardous substances, pollutants, and contaminants involved in the release or threat of release of hazardous substances at the Site include, but are not limited to: volatile organic compounds, semi-volatile organic compounds, metals and asbestos-containing materials. EPA has spent public funds and is considering spending additional public funds to investigate and address the releases and/or threatened release(s) at the Site. Based on information presently available to EPA, as the operator/generator of the Site, EPA has determined that you are potentially liable under CERCLA for the cleanup of the Site, which you are invited to perform or finance and

which you may be ordered to perform at a later date. Unless you or some other potentially responsible party ("PRP") or parties commit to properly performing or financing such actions, EPA will perform these actions pursuant to Section 104 of CERCLA, 42 U.S.C. § 9604.

EXPLANATION OF POTENTIAL LIABILITY

Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) and 9607(a), Section 7003 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6973, and other laws, potentially responsible parties ("PRPs") may be required to implement cleanup actions deemed necessary by EPA to protect public health, welfare, or the environment. PRPs may also be responsible for all costs incurred by the Government in responding to any release or threatened release at the Site. Such actions and costs may include, but are not limited to: expenditures for investigations, planning, response, disposal, oversight, and enforcement activities.

PRPs include current and former owners and operators of a Site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the Site, and persons who accepted hazardous substances for transport and selected the Site to which the hazardous substances were delivered.

Based on information gathered during investigations of the Site, EPA believes that you are a PRP under Section 107(a) of CERCLA with respect to the Site. Specifically, EPA has reason to believe that you are an operator/generator of the Site and have potential liability for the Site. You are urged to voluntarily perform or finance those response activities that EPA determines are necessary at the Site.

INFORMATION REQUEST

EPA is further investigating the release or threat of release of hazardous substances, pollutants and contaminants at the Site. This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to or from the Site, generated, treated, stored, or disposed of at the Site. EPA is also seeking information concerning those persons responsible for the contamination at the Site and their ability to reimburse the government for its response costs.

Pursuant to the authority of Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in an enclosure to this letter (see Enclosure 3). Compliance with the Information Request is mandatory and you have an affirmative duty to obtain the information requested, whether or not it is readily available. Failure to respond fully and truthfully to the Information Request, or to adequately justify such failure to respond, may result in an enforcement action by EPA pursuant to Section 104(e) of CERCLA which permits EPA to seek the imposition of penalties of up to thirty-seven thousand five hundred dollars ($37,500) for each day of continued noncompliance. Please be further

advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

OUTLINE OF SITE RESPONSE ACTIVITIES

In accordance with CERCLA and other authorities, EPA has taken the following response actions at the Site under the authority of the Superfund Program, so far: a Preliminary Assessment and Site Investigation ("PA/SI") in order to gain a basic understanding of any risks posed to human health and/or the environment by releases or threatened releases from the Site.

Due to the presence of hazardous substances at the Site, and in light of other factors, EPA has determined that there is an imminent and substantial endangerment to public health, welfare, or the environment. In response, EPA plans to conduct the following immediate removal activities at the Site: 1) conduct additional sampling, as needed, to determine the extent of contamination; 2) secure and/or remove building/structural materials to gain access to impacted areas; 3) identify, characterize, remove, and properly dispose of containerized chemicals and other incidental hazardous substances at an EPA-approved disposal facility; 4) remove soils, drums, containers, contaminated building materials, and non-containerized hazardous substances that may pose an imminent threat; 5) secure the Site with fencing to prevent unrestricted access; and 6) repair any response-related damage.

INVITATION TO PERFORM SITE RESPONSE ACTIVITIES

Before EPA spends additional public funds to undertake the removal action at the Site, EPA urges you to participate in removal activities or finance all the removal activities outlined above. Any such work performed by you in your capacity as a PRP may be conducted pursuant to an administrative order and an EPA-approved work plan as authorized by Section 106(a) of CERCLA, 42 U.S.C. § 9606(a). Prior to final issuance of such an order, a draft order would be sent to you or your representative for review and comment. Enclosed is a copy of a summary of a generic Scope of Work (Enclosure 1). This document should-provide an understanding of the types of plans and activities typically required by such an Order.

Be advised that even if you do not indicate a willingness to perform or finance necessary response actions, EPA explicitly reserves any rights it may have to order you to undertake such actions under Section 106 of CERCLA, 42 U.S.C. § 9606. Failure to comply with a Section 106(a) administrative order may result in a fine of up to thirty-seven thousand five hundred dollars ($37,500) per day under Section 106(b) or imposition of treble damages under Section 107(c) (3) of CERCLA. Further, you may be held liable under Section 107(a) for the cost of the response activities EPA performs at the Site and for any damages to natural resources. In

addition, by virtue of Section 113 of CERCLA, 42 U.S.C. § 9613, other PRPs who agree to perform the necessary response action may seek contribution protection.

FINANCIAL CONCERNS/ABILITY TO PAY SETTLEMENTS

EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a Site may be substantially limited. If you believe, and can document, that you fall within that category, please contact Tina Hennessy or Cynthia Lewis at the addresses below for information on "Ability to Pay Settlements." In response, you will receive a package of information about the potential for such settlements. You will be asked to fill out form(s) about your finances and to submit financial records including business federal and state income tax returns. If EPA concludes that you have a legitimate inability to pay the full amount of EPA's costs, EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

In the event you intend to or have already filed for dissolution or reorganization under bankruptcy laws, you are hereby requested to include EPA-Region 1 on any mailing or notice lists used in that proceeding. The United States reserves the right to file a proof of claim or application for reimbursement of administrative expenses in such a proceeding.

PRP RESPONSE AND EPA CONTACT

You should contact EPA within **ten (10) business days** after receipt of this letter to indicate your willingness to perform or finance the response activities outlined above. If EPA does not receive a response within that time, EPA will assume that you do not wish to negotiate a resolution of your liabilities in connection with the response and that you have declined any involvement in performing response activities. Be advised, however, that liability under CERCLA is joint and several; therefore, each PRP is potentially liable for undertaking all response actions or reimbursing the Government for the entire amount of its response costs.

Also, please send a written response to the Information Request and provide all supporting financial documentation within **thirty (30) days** to Tina Hennessy at the address below.

Please provide the name, address, and telephone number of a designated contact for future communications. Your written response, including any technical comments or questions concerning the proposed response activities, should be directed to the EPA On-Scene Coordinator ("OSC") or the Enforcement Coordinator ("EC") for the Site:

Daniel Burgo, OSC
U.S. Environmental Protection Agency
Emergency Response & Removal Section 1 (OSRR02-2)
5 Post Office Square, Suite 100

Boston, Massachusetts 02109-3912
TEL (617) 918-1052
FAX (617) 918-0052

Tina Hennessy, EC
U.S. Environmental Protection Agency
Emergency Response & Removal Section 1 (OSRR02-2)
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
TEL (617) 918-1216
FAX (617) 918-0216

Legal questions and all communications from counsel should be directed to:

Cynthia Lewis, Senior Enforcement Counsel
U.S. Environmental Protection Agency
Office of Environmental Stewardship (OES04-3)
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912
TEL (617) 918-1889
FAX (617) 918-0889

DECISION NOT TO USE SPECIAL NOTICE

Under Section 122(e) of CERCLA, 42 U.S.C. § 9622(e), EPA has the discretionary authority to invoke special notice procedures to formally negotiate the terms of an agreement between EPA and the PRPs to conduct or finance response activities. The use of special notice procedures triggers a moratorium on certain EPA activities at the Site while formal negotiations between EPA and the PRPs are conducted.

Due to the exigencies posed by conditions present at the Site, removal activities must be conducted as expeditiously as possible. EPA has, therefore, decided not to invoke the Section 122(e) special notice procedures with respect to CERCLA removal actions at this Site. Nonetheless, EPA is willing to discuss settlement opportunities without invoking a moratorium, but will continue the response action as planned unless such discussions lead expeditiously to a settlement.

INFORMATION TO ASSIST YOU

EPA would like to encourage communication between you, other PRPs, and EPA concerning the Site. A Notice of Potential Liability has also been sent to: 25 Grant Street, LLC; Rowayton Trading Company, Inc.; and L.A. Barnaby and Sons, Inc. You or your attorney may wish to

discuss the matters set forth in this letter with such parties or their attorneys.

ADMINISTRATIVE RECORD

Pursuant to Section 113(k) of CERCLA, 42 U.S.C. § 9613(k), EPA will establish an administrative record containing documents that serve as the basis of EPA's decision on the selection of a cleanup action for the Site. The Administrative Record files may be inspected and comments may be submitted by contacting the OSC for the Site, Daniel Burgo, at the above address.

The Administrative Record Files with corresponding index should be available for inspection at a repository near the Site within sixty (60) days of initiation of on-site removal activities, as well as the Superfund Records Center, U.S.E.P.A., 5 Post Office Square, Suite 100, Boston, MA 02109, (617) 918-1440.

SITE ACTIVITY OUTSIDE EPA ACTIONS

If you are already involved in discussions with state or other local authorities or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise or direct you to restrict or discontinue any such activities. However, you are advised to report the status of any such discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions.

CONSENT TO ACCESS

EPA hereby requests access to the Site through your written consent, so that EPA can perform or oversee the response actions discussed above. This request is enclosed (Enclosure 2).

RESOURCES AND INFORMATION FOR SMALL BUSINESSES

As you may be aware, on January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law via the Internet at http://www.epa.gov/swerosps/bf/sblrbra.htm and review EPA guidance documents regarding these exemptions at http://www.epa.gov/compliance/resources/policies/cleanup/superfund.

EPA has created a number of helpful resources for small businesses. EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at www.epa.gov. In addition, the EPA Small Business Ombudsman may be contacted at www.epa.gov/sbo. Finally, EPA developed a fact sheet about the Small Business Regulatory

Enforcement Fairness Act ("SBREFA"), which is also enclosed with this letter (Enclosure 4).

PURPOSE AND USE OF THIS NOTICE

The factual and legal discussions contained in this letter are intended solely to provide notice and information. Such discussions are not intended to be, and cannot be, relied upon as EPA's final position on any matter set forth herein.

Please give these matters your immediate attention and consider consulting with an attorney. If you have any questions regarding this letter, please contact either Cynthia Lewis or Tina Hennessy at the telephone numbers referenced above.

By copy of this letter, EPA is notifying the State of Connecticut and the Natural Resources Trustees of EPA's intent to perform, or to enter into negotiations for the performance or financing of, response actions at the Site.

Thank you for your attention to this matter.

Sincerely,

Carol Tucker, Chief
Emergency Planning and Response Branch

Enclosures:
Enclosure 1- Generic Scope of Work
Enclosure 2- Consent to Access for Removal Action
Enclosure 3- Information Request pursuant to Section 104(e) of CERCLA
(note – time-sensitive, response required)
Enclosure 4- Small Business Regulatory Enforcement Fairness Act fact sheet

cc: Matt Williamson, CTDEEP
Dave Poynton, CTDEEP
Andrew Raddant, Regional Environmental Officer - U.S. DOI
Ken Finkelstein, National Oceanic & Atmospheric Administration - NOAA
Daniel Burgo, EPA On-Scene Coordinator – OSRR02-2
Tina Hennessy, EPA Enforcement Coordinator – OSRR02-2
Cynthia Lewis, EPA Senior Enforcement Counsel – OES04-3
Holly Inglis, EPA Records Center – OSRR01-5
Patti Ludwig, EPA CERCLIS Coordinator – OSRR01-5

ENCLOSURE 1

SUMMARY OF GENERIC SCOPE OF WORK

This summary of the Generic Scope of Work is provided for informational purposes only. More detailed provisions will be set forth in the site-specific Scope of Work. Provisions may vary from site to site.

When EPA determines that a Potentially Responsible Party (PRP) has the ability to promptly and properly prevent, mitigate, or eliminate the threats posed by hazardous substances at the Site, EPA may issue an Administrative Order (Order) to such party (the Respondent) with an attached Scope of Work (SOW). The Order and SOW, among other things, compel the Respondent to develop a plan to clean up the Site. The components of the plan (also called a "deliverable") must be submitted to EPA for approval before implementation. Detailed instructions for generating each component shall be provided in the SOW. The plan shall consist of the components listed below.

1) **Site Security** - The Respondent shall provide on-site security service. Site security shall be maintained until EPA determines the threats posed by conditions at the Site are eliminated or substantially mitigated.

2) **Notification of Contractor Selection** - The Respondent shall notify EPA of the proposed cleanup contractor selected to perform work required under the Order.

3) **Site-Specific Health and Safety Plan (HASP) -** The Respondent shall develop and implement a HASP for all activities to be conducted at the Site. The HASP shall be developed to protect all on-site personnel and must comply with all applicable health and safety regulations.

4) **Quality Assurance Plan (QAP) -** The Respondent shall develop a QAP to be utilized in conducting all field and laboratory analysis. The QAP shall ensure that analytical results generated are of known quality.

5) **Site Assessment Plan (SAP)** - The Respondent shall develop a SAP specifying the overall strategy of the field investigative work necessary to characterize site contamination.

6) **Site Assessment** - A Site Assessment shall be conducted following EPA approval of the SAP.

7) **Site Assessment Report and Cleanup Plan (SAR/CP)** - Following completion of the Site Assessment, the Respondent shall develop a SAR/CP that summarizes the Site Assessment and proposes cleanup methods necessary to substantially mitigate and/or eliminate the threats posed by hazardous substances present at the Site.

8) **Site Cleanup** - The Site Cleanup shall be conducted according to the EPA approved Cleanup Plan.

9) **Completion of Work Report (CWR)** - Upon completion of the Site Cleanup, the Respondent shall submit a CWR summarizing the work performed under the Order and SOW and outlining any remaining contamination.

At any time prior to or after the completion of the work specified in this SOW, EPA may determine that additional tasks are necessary in order to achieve the objectives of the Order, the SOW and CERCLA.

ENCLOSURE 2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109

ATTN: OSC Daniel Burgo (OSRR02-2)

CONSENT FOR ACCESS TO PROPERTY FOR A REMOVAL ACTION

SITE NAME: Grant Street Fire Site

OPERATOR NAME: Jim Waters Corporation

LOCATION OF PROPERTY: 25 Grant Street (M/B/L/U 49/1804/3/K)
Bridgeport, CT

I (We), consent to the officers, employees, agents, contractors, subcontractors, consultants, and other authorized representatives of the United States Environmental Protection Agency ("EPA") entering and having continued access to the above-referenced property for the following purpose(s):

- Performing removal actions, or overseeing potentially responsible parties performing removal actions, to mitigate the hazards posed by hazardous substances, pollutants and contaminants that were released, or pose a substantial threat of release, at the Site, including: 1) conducting additional sampling as needed to determine the extent of contamination; 2) securing and/or removing building/structural materials to gain access to impacted areas; 3) identifying, characterizing, removing, and properly disposing of containerized chemicals and other incidental hazardous substances at an EPA-approved disposal facility; 4) removing soils, drums, containers, contaminated building materials, and non-containerized hazardous substances that may pose an imminent threat; 5) securing the Site with fencing to prevent unrestricted access and; 6) repairing any response-related damage.

- Taking any other response actions or evaluating the need to take other response actions.

I (We) understand that a representative of the company may accompany EPA or its representatives during the removal action and I (we) agree that our representatives will not interfere in any way with conduct of the removal action. However, this Consent for Access is not contingent on a representative accompanying EPA or its representatives during the removal action.

I (we) realize that these actions are undertaken under EPA's response and enforcement authorities under the Comprehensive Environmental Response, Compensation and Liability Act of 1980, as amended ("CERCLA"), 42 U.S.C. § 9601 et seq.

I (We) give this written permission voluntarily with knowledge of my (our) right to refuse, and without threats or promises of any kind.

CONSENT OF OPERATOR(S)/TENANT(S)

_____
Date

_____
Signature of Property Operator/Tenant's Authorized Representative

Printed Name: _____

Title: _____

Address: _____

_____

Phone: _____

Email: _____

(Attach additional sheets if necessary)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109

FREQUENTLY ASKED QUESTIONS ABOUT REQUESTS FOR ACCESS FOR PRELIMINARY ASSESSMENTS & SITE INVESTIGATIONS ("PA/SIs") AND OTHER REMOVAL ACTIONS BY THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY ("EPA")

EPA has frequently been asked the following questions regarding access to property for PA/SIs and other types of Removal Actions. We hope these answers assist you.

1. What type of work will be done on my property?

PA/SIs and other types of removal actions are usually done by an EPA contractor under the direction of the EPA On-Scene Coordinator (the "OSC"). Generally, the OSC and the contractor will walk around the property to get an overview of the area and collect a small number of water, sediment, or soil samples. In most cases, sampling is done with a hand auger or similar hand-held sampling device, and heavy equipment is not used. Sometimes, it is necessary to drive vehicles onto the property. It may also be necessary to take photographs of the property before work begins or during the sampling activities. Unless there is some unusual circumstance, the work is performed during normal business hours.

2. How long with EPA be on my property?

A typical PA/SI will take 1-2 days to complete. The initial site reconnaissance may take several hours. A return visit to perform sampling could require a full day or more. Other types of removal actions can take up to several months to perform.

3. Can I be there when EPA is on the property?

Yes, you or your representative may observe the work. However, you may not interfere with the work and your presence may not be a condition for the work to take place.

4. Will the property be changed or damaged in some way?

The work that EPA will be doing will not change or damage the property. It is EPA's policy to leave the property in the same condition as before EPA entered, whenever practicable. Should something happen to the property as a result of EPA's actions, EPA's contractors are required to carry comprehensive general liability insurance. In addition, the protections of the Federal Tort Claims Act would also apply.

5. Do I have to allow EPA onto my property?

The Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), also known as Superfund, gives EPA the right to enter your property if it has a reasonable basis to believe that there is a release or threat of release of hazardous substances on your property. This access authority extends to properties adjacent to existing Superfund sites, as well as to the sites themselves.

6. Can I get a release from liability or indemnification from EPA?

No. EPA's right to access to conduct the PA/SI or other types of removal actions may not be conditioned on the Agency giving up any legal claims which it might have against the property owner. EPA also cannot agree to indemnify an owner for damages caused by EPA or its contractor. Indemnification by EPA is a violation of the Anti-Deficiency Act and illegal for EPA to provide.

7. Can I get copies of any reports EPA prepares about the property?

Yes. You will be given copies of the final PA/SI reports and Removal Action Reports. You may also receive copies of any data which has already gone through the sampling analysis quality assurance and quality control process. You may also receive, upon request a portion of the samples which were collected and which you may have analyzed at your own expense.

8. Will EPA give me notice before coming onto my property?

It is EPA's practice to provide advance notice of property access whenever practicable. However, in the event of any emergency, EPA will require immediate access to the property.

9. What will happen if I do not agree to give EPA access?

If EPA determines that it is necessary to obtain access at this time, CERCLA allows EPA to issue an administrative order requiring you to provide access, or EPA may request that the U.S. Department of Justice seek a warrant or judicial order for access from the U.S. District Court. The Department of Justice has been successful in obtaining warrants or judicial orders in the past.

ENCLOSURE 3

INFORMATION REQUEST FOR THE BRIDGEPORT FIRE SUPERFUND SITE

****

Period Being Investigated: January 1, 2014 to the Present

****

In addition to the questions which follow, this enclosure includes a declaration, a site description, detailed instructions for responding to this request, and definitions of words such as "Respondent," "identify," and "waste" used in the questions. These materials appear at the end of the questions; please refer to them in answering all questions. Of particular importance:

- Answer each question with respect to the period being investigated noted above unless the question indicates otherwise.
- Answer all questions completely in accordance with the definitions and instructions.
- Complete the enclosed declaration.
- For each question, identify all persons and documents relied upon in the preparation of the answer.
- All information provided for which you are making a claim of business confidentiality or which contains personal privacy information should be contained on separate sheets and clearly marked as confidential or private.
- This request imposes a **continuing obligation** upon you to submit responsive information discovered after your original response is submitted to EPA.

1. Information Request Questions

NOTE: All questions in this section refer to the present time unless otherwise indicated.

a. Provide the full legal name mailing address and email address of Respondent.

b. For each person answering these questions on behalf of Respondent, provide:

i. full name;
ii. title;
iii. business address; and
iv. business telephone number, email address and FAX machine number.

c. If Respondent wishes to designate an individual for all future correspondence concerning the Site, including any legal notices, please provide that individual's name, address, telephone number, email address and FAX number, and the designated individual's relationship to the Respondent.

2. Legal and Financial Information for Respondent, Jim Waters Corporation

NOTE: All questions in this section refer to the time period 2001-2015, unless otherwise specifically indicated below.

a. Complete, fully, the attached **Financial Statement for Businesses** (Attachment 3-2) for Respondent and provide all supporting documentation.

b. Provide copies of all federal and state tax returns (income tax, gift tax, estate tax, or other), including all complete schedules, for Respondent for the past five (5) years, as submitted to the Internal Revenue Service.

c. Provide the last five (5) years' financial statements for Respondent including income statements, balance sheets, cash flow reports, shareholder's reports, financial audits or other financial reports showing Respondent's assets, profits, liabilities and current financial status.

d. Provide all loan applications filed by Respondent within the last five (5) years.

e. If Respondent is or was at any time, a corporation, provide

i. the date of incorporation;
ii. state of incorporation;
iii. the names of all officers during the period being investigated, including their titles and dates of office;

iv. the names of all directors during the period being investigated, including their titles and dates of office;
v. the names of all shareholders owning the company's stock at any time during the period being investigated; including the name, current or most recent address and phone number of each shareholder; and the number of shares held by each shareholder; and
vi. the names and addresses of all parent and subsidiary entities affiliated with the company.

f. If Respondent has filed for bankruptcy, provide:

i. the U.S. Bankruptcy Court in which the petition was filed;
ii. the docket numbers of such petition;
iii. the date the bankruptcy petition was filed;
iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
v. a brief description of the current status of the petition.

g. If Respondent no longer exists as a legal entity because of dissolution provide:

i. a brief description of the nature and reason for dissolution;
ii. the date of dissolution;
iii. documents memorializing or indicating the dissolution of the entity;
iv. a statement of the net worth of the entity at the time of termination; and
v. a statement of how and to whom the entity's assets were distributed.

h. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:

i. a brief statement describing the nature of the asset purchases or mergers;
ii. the titles and dates of the documents that embody the terms of such transactions;
iii. the identities of the seller, buyer and any other parties to such transactions; and
iv. copies of the documents that embody the terms of such transactions (e.g., purchase agreements, merger and dissolution agreements, etc.).

i. If Respondent has ever done business under any other name;

i. list each such name; and
ii. list the dates during which such name was used by the company.

j. Provide name and address of the person and/or account in charge of preparing or reviewing Respondent's annual report, and provide a copy of the most recent annual report.

3. Insurance

NOTE: All questions in this section apply to Respondent without regard to time.

a. Provide copies of all property, casualty and/or liability insurance policies, and any other insurance contracts referencing the Site or facility (including, but not limited to, Environmental Impairment Liability, Pollution Legal Liability, Cleanup Cost Cap or Stop Loss Policies, Institutional Controls and Post Remediation Care Insurance). Include any and all policies providing the Respondent with insurance for loss or damage to the Site property.

b. To the extent not provided in Question a. above, provide copies of all insurance policies that may potentially provide the Respondent with insurance for bodily injury or property damage in connection with the Site and/or Respondent's business operations (including, but not limited to, Comprehensive General Liability). Include, without limitation, all primary, excess, and umbrella policies.

c. To the extent not identified in Questions a. or b. above, provide all other evidence of casualty, liability and/or pollution insurance issued to Respondent for the period being investigated.

d. If there are any such policies of which you are aware but neither possess copies, nor are able to obtain copies, identify each such policy to the best of your ability by identifying:

i. the name and address of each insurer and of the insured;
ii. the type of policy and policy numbers;
iii. the per occurrence policy limits of each policy; and
iv. the effective dates for each policy.

e. Identify all insurance brokers or agents who placed insurance for the Respondent during the period being investigated. Identify by name and title, if known, individuals at the agency or brokerage most familiar with the property, pollution and/or liability insurance program of Respondent and the current whereabouts of each individual, if known.

f. Identify all previous settlements by Respondent with any insurer which relates in any way to environmental liabilities and/or to the policies referenced above, including:

i. the date of the settlement;

ii. the scope of release provided under each settlement;
iii. the amount of money paid by the insurer pursuant to such settlement; and
iv. provide copies of all such settlement agreements.

g. Identify all communications and provide all documents that evidence, refer, or relate to claims made by or on behalf of the Respondent under any insurance policy in connection with the Site since the September 2014 fire at 25 Grant Street. Include any responses from the insurer with respect to any claims.

h. Identify any and all insurance, accounts paid or accounting files that identify Respondent's insurance policies.

i. List all named insureds on property, pollution and/or casualty liability insurance providing coverage to Respondent during the period being investigated including the nature of the insurance requirement and the years when the evidence was required.

j. Identify any person or organization requiring evidence of Respondent's casualty, liability and/or pollution insurance during the period being investigated as identified in Question a. above, including the nature of the insurance requirement and the years when the evidence was required.

4. Lease(s)

NOTE: All questions in this section refer to the period being investigated.

a. Identify all lease(s), sublease(s), and all other written or oral agreements for the use and/or occupancy of the property within the Site boundaries, including:

i. each lessor or landlord and each lessee or tenant of property within the Site;
ii. the beginning and ending dates of each such arrangement; and
iii. describe the specific real estate and/or buildings to which each such arrangement relates.

b. Provide copies of all documents related to each lease, sublease, or similar property interest of property within the Site boundaries, including but not limited to all documents reflecting the purpose or terms of each lease, sublease or similar property interest.

c. Describe all activities undertaken at the Site by each lessee/tenant including, but not limited to:

i . a brief narrative of the day to day operation of the Site for every three year period during the period being investigated;
ii. a description of the activities at the Site by date;

iii. a description of the generation, storage, placement, disposal or treatment of wastes at the Site;
iv. the identification of (see Definitions) contractors, tenants, or others who carried out operations at the Site;
v. a description of the activities each contractor or other took at the Site by date;
vi. a description of the collection of monies or other compensation for the use of the Site by others;
vii. a description of the construction and/or demolition of any surface or subsurface structures at the Site (including but not limited to the dates such activities took place); and
viii. a description of any other significant operations or activities at the Site.

d. Provide a description of all hazardous materials used at the Site by each tenant or operator.

5. Respondent's Operations

NOTE: All questions in this section refer Respondent's operations at the Site before the 2014 fire unless otherwise indicated.

a. Describe the nature of Respondent's operations at the Site including:

i. a description of Respondent's activities by date;
ii. specific types of materials used (*e.g.*, perfumes, dyes, oils, solvents, etc.;
iii. how and where chemicals were stored, handled, placed or disposed of at the Site (*e.g.*, chemicals were stored in drums/containers on pallets in the building); and
iv. provide a sketch of the location(s) where chemicals were stored, handled, placed or disposed.

b. Provide copies of all local, state, and federal permits or licenses for the operations at the Site, including but not limited to permits for the transport, receipt, generation, handling, mixing, reclamation, recycling, storage, or disposal of wastes.

c. Provide copies of all documents which were created or kept concerning Site operations by owners, lessees, tenants, contractors, site managers, or others, including but not limited to:

i. documents concerning waste disposal practices;
ii. documents concerning waste disposal policies, procedures, or guidelines;
iii. documents concerning the location of wastes placed or disposed at the Site;

iv. documents concerning the entities and/or individuals who brought wastes to the Site; and

v. documents concerning responsibility for and supervision of waste disposal practices at the Site.

d. Provide copies of Materials Safety Data Sheets ("MSDS") for materials used in Respondent's operations.

e. Describe each type of waste brought to or generated at the Site during Respondent's operation from the time Respondent began operating at the Site to the present, including but not limited to:

i. the name of each type of waste;
ii. the chemical composition of each type of waste;
iii. the color of each type of waste;
iv. the odor of each type of waste;
v. the physical state of each type of waste (*e.g.*, liquid, solid, sludge); and
vi. whether the waste was hazardous, toxic, flammable, reactive, corrosive, or was otherwise a hazardous substance.

f. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations.

g. Provide copies of any and all documents (see Definitions), including photographs, and videotapes which describe or depict the Site, and its operations before the September 2014 fire at the Site. Identify (see Definitions) who else may have such documents or photographs.

h. For each legal action brought against current or prior owners, tenants, or site operators/managers of the Site regarding Site operations, permitting, or environmental matters, provide:

i. the caption name, jurisdiction, and docket number (*e.g.*, U.S. v. Owner (D.N.H. 92-003));
ii. the date such action was initiated;
iii. the names of parties to the action; and
iv. the final disposition or current status of the action.

6. Respondent's Wastes and Waste Streams (including By-Products)

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

a. Complete the enclosed "Waste Survey" (Attachment 3-3) checking each substance present in Respondent's wastes or by-products and providing all requested information for each such substance that is checked.

b. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges and solids, provide the following information:

i. its physical state;
ii. its nature and chemical composition;
iii. its color;
iv. its odor;
v. the approximate monthly and annual volumes of each type of waste (e.g., gallons, cubic yards, pounds); and
vi. the dates (beginning and ending) during which each type of waste was produced by Respondent's operations.

6. Information From Others

a. If not already included in your response, if you have reason to believe that there may be persons able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, (including but not limited to information about current and past uses of the Site) identify such persons and the additional information or documents that they may have.

7. Compliance With This Request

a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:

i. the names of all individuals consulted;
ii. the current job title, job description, address and telephone number of each individual consulted;
iii. the job title and job description during the period being investigated of each individual consulted;
iv. whether each individual consulted is a past employee of Respondent;
vi. the nature of all documents reviewed;
vii. the locations where those documents reviewed were kept prior to review; and
viii. the location where those documents reviewed are currently kept.

b. Identify Respondent's policy with respect to document retention.

The following form of declaration must accompany all information submitted by Respondent in response to the Information Request:

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of

_____ and that the foregoing is complete, true, and correct.
Respondent

Executed on _____, 20__

_____
Signature

_____
Type Name

_____
Title

ATTACHMENT 3-1

INFORMATION REQUEST INSTRUCTIONS

1. Answer Every Question Completely. You are required to provide a separate answer to each and every question and subpart of a question set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.

2. Number Each Answer. Number each answer with the number of the question to which it corresponds.

3. Provide Information about the Period Being Investigated. You are required to answer each question with respect to the period being investigated. If the response fails to address the period being investigated, EPA will consider this a failure to comply with the request and may take action against you for this noncompliance.

4. Provide the Best Information Available. You must provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.

5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.

6. Submit Documents with Labels Keyed to Question. For each document produced in response to this Information Request, indicate on the document (or in some other reasonable manner) the number of the question to which it responds.

7. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA. Failure to supplement your response within thirty (30) days of discovering such responsive information may subject you to $37,500 per day penalties. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. If any part of the response to this Information Request is found to be false, the signatory to the response and the Respondent may be subject to criminal prosecution.

8. Complete the Enclosed Declaration. You are required to complete the enclosed declaration which certifies that the information you are providing in response to this Information Request is true, accurate, and complete.

9. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." Personal financial information, including individual tax returns, may also be claimed as confidential. In addition, please note that you bear the burden of substantiating your confidentiality claim. Your claim of confidentiality should be supported by the submission of information supporting such a claim; the type of information to be submitted is set out in 40 C.F.R. Part 2. Information covered by a claim of confidentiality will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. **If no such claim accompanies the information when it is received by EPA, or if you do not assert such claim on the information, it may be made available to the public by EPA without further notice to you.** You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

10. Disclosure to EPA Contractor. Information which you submit in response to this Information Request will be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors listed in the attached EPA Contractor List for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

11. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information." You should note however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you. (Please see Instruction 9 for information concerning treatment of individual tax returns.)

12. Objections to Questions. While the Respondent may indicate that it objects to certain questions in this Information Request, it must provide responsive information notwithstanding those objections. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.

13. Claims of Privilege. If you claim that any document responsive to this Information Request is a communication for which you assert that a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege. For any

document for which you assert that a privilege exists for a portion of it, provide the portion of the document for which you are not asserting a privilege, identify the portion of the document for which you are asserting the privilege, and provide the basis for such an assertion. Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

EPA CONTRACTOR LIST

Updated February, 2015

CONTRACTOR	CONTRACT NUMBER
ASRC Primus Solutions, Inc. Subcontractor: Booz Allen Hamilton Effective: August 22, 2013	Contract # EP-W-11-024
Eisenstein Malanchuk LLP Effective: March 1, 2013	Contract # EP-W-013-006
H&S/Nobis Subcontractor: TechLaw, Inc. Effective: September 23, 2011	START 8(a) Contract # EP-S1-11-03

INFORMATION REQUEST DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 et seq., RCRA, 42 U.S.C. Section 6901 et seq., or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Information Request and related Enclosures:

1. The term "you" or "Respondent" shall mean the addressee of this Request (Jim Waters Corporation), the addressee's officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents, and any predecessor or successor corporations or companies, and/or any subsidiaries thereof.

2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include but not be limited to:

(a) writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:

1. invoice, receipt, endorsement, check, bank draft, cancelled check, deposit slip, withdrawal slip, order;
2. letter, correspondence, fax, telegram, telex, Email;
3. minutes, memorandum of meetings and telephone and other conversations, telephone messages;
4. agreement, contract, and the like;
5. log book, diary, calendar, desk pad, journal;
6. bulletin, circular, form, pamphlet, statement;
7. report, notice, analysis, notebook;
8. graph or chart; or
9. copy of any document.

(b) microfilm or other film record, photograph, or sound recording on any type of device;

(c) any tape, disc, or other type of memory generally associated with computers and data processing, together with:

1. the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory; and

2. printouts of such punch card, disc, or disc pack, tape or other type of memory; and

(d) attachments to or enclosures with any document as well as any document referred to in any other document.

3. The term "identify" or "provide the identity of" means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with job title, position or business; and (d) the person's social security number.

4. The term "identify" or "provide the identity of" means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth: (a) its full name; (b) complete street address and telephone number; (c) legal form (e.g. corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.

5. The term "identify" or "provide the identity of" means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) its number, if any (e.g., invoice or purchase order number); (d) the identity of the author, addressor, addressee and/or recipient; (e) and a summary of the substance or the subject matter. Alternatively, Respondent may provide a copy of the document.

6. The term "material" or "materials" shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.

7. The terms "the period being investigated" and "the relevant time period" shall mean the period being investigated as specified on the first page of the Information Request Questions.

8. The terms "the Site" or "the facility" shall mean and include the property located at 25 Grant Street in Bridgeport, Connecticut, currently identified by EPA as the Grant Street Fire Superfund Site, which is more fully described in the enclosed Site Description (Attachment 3-4).

9. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

10. The term "asset" shall mean and include but not be limited to the following: cash, commodities, personal property, collectibles, real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies,

interests in partnerships, corporations, and unincorporated companies, whether foreign or domestic, securities, patents, stocks, bonds, and other tangible as well as intangible property.

11. The term "real estate" shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

EPA

Attachment 3-2

Financial Statement for Businesses *

1. Your name and address *(including zipcode and county)*	1a. Business name and address *(including zipcode and county)*	2. Business phone number ( )
3. Name and address of registered agent *(including zipcode and county)*		4. *(Check appropriate box)* ☐ Sole proprietor ☐ Trust ☐ Partnership ☐ Other (specify) _____ ☐ Corporation

5. State of Incorporation (or country if foreign)	5a. Employer Identification Number	6. Date of Incorporation	7a. Type of business
			7b. SIC Code

8. Information about owner, partners, officers, directors, major shareholder (5% or more stock ownership), other holders of more than 5% equity interest, holders of rights to purchase more than equity interest and other persons with an ability to control.

Name and Title	Effective Date	Home Address	Social Security Number (optional)	Phone Number	Total Shares or Interest

Section I General Financial Information

9. Last three years Federal and state income tax returns ▶	Forms Filed	Tax Years ended	Net income before taxes

10. Bank accounts *(List all types of accounts including checking, savings, certificates of deposit, etc.)*

Name of Institution	Address	Type of Account	Account No.	Balance
		Total *(Enter in Item 19)* ▶		

11. Bank Credit available *(Lines of credit, etc.)*

Name of Institution	Address	Credit Limit	Amount Owed	Credit Available	Monthly
Totals		▶			

12. Location, box number, and contents of all safe deposit boxes rented or accessed

* This information is requested pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. § 9604, and is not subject to approval of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501, et seq.

Section I - *continued*

General Financial Information

13. Real property

Brief Description and Type of Ownership	Address *(include county, state and parcel number)*
a.	
b.	
c.	

14. Insurance policies owned with business as beneficiary

Name Insured	Company	Policy Number	Type	Face Amount	Available Loan Value
		Total *(Enter in Item 21)*		▶	

15. Additional Information *(Court and administrative proceedings by or against the business, settlement agreements, agreements to purchase or sell tangible or financial assets other than in the ordinary course of business, legal claims [whether asserted or not], bankruptcies, repossessions, recent transfers of assets for less than full value, anticipated increases in income, options to buy or sell real or personal property, real or personal property being purchased under contract, real or personal property being held on behalf of the business).*

15a. List all subsidiaries owned, joint ventures, partnerships and other entities controlled by the business. Provide current market value of the business' interest in such subsidiary or other entity.

16. Federal government departments or agencies with whom you have a contract for payment of goods or services

Agency Name	Address	Contract No.	Amount to be Received	Payment Due Date

16a. Federal government departments or agencies that have extended or given the business loans, grants or assistance, or to which you have applied (or anticipate applying for any loan, grant, or assistance) in the past 5 years.

17. Accounts/Notes receivable *(Include loans to stockholders, officers, partners, etc.)*

Agency Name	Address	Amount Due	Due Date	Status
	Total *(Enter in Item 20)* ▶			

Section II. Asset and Liability Analysis

Description (a)		Cur. Mkt Value (b)	Liabilities Bal. Due (c)	Equity in Asset (d)	Amount of Mo. Pymt. (e)	Name and Address of Lien/Note Holder/Obligee (f)	Date Pledged (g)	Date of Final Pymt. (h)
18. Cash on hand								
19. Bank accounts								
19a. Securities and other financial assets owned								
20. Accounts/Notes receivable								
21. Insurance Loan Value								
22. Real property *(from item 13)*	a.							
	b.							
	c.							
	d.							
23. Vehicles *(Model, year, license)*	a.							
	b.							
	c.							
24. Machinery and equipment *(Specify)*	a.							
	b.							
	c.							
25. Merchandise inventory *(Specify)*	a.							
	b.							
26. Other Assets (including permits, licenses, tax loss carry forwards, agreements not to compete, other contracts) *(Specify)*	a.							
	b.							
	c.							
	d.							
27. Other Liabilities *(Include judgements, notes, tax liens, etc.)*	a.							
	b.							
	c.							
	d.							
	e.							
28. Federal & State Taxes Owed								
29. **Totals**								

Section III. Income and Expense Analysis

The following information applies to income and expenses during a one year period:

_____ to _____

Accounting method used

Income		Expenses	
30. Gross receipts from sales, services, etc.	$	36. Materials purchased	$
31. Gross rental income		37. Wages and salaries of employees	
32. Interest		38. Wages/salaries/bonuses for officers, directors and stockholders	
33. Dividends		39. Rent	
34. Other income *(Specify)*		40. Installment payments *(from line 29)*	
		41. Supplies	
		42. Utilities / Telephone	
		43. Gasoline / Oil	
		44. Repairs and maintenance	
		45. Insurance	
		46. Current taxes	
		47. Other , including fees paid for services *(Specify)*	
35. **Total** ▶	$	48. **Total** ▶	$
		49. **Net difference** ▶	$

50. List all transferred real & personal property, including cash (by gift; by loan that was not at fair market terms; by sale for less than fair market value or made outside the normal course of business, etc.) that was made within the last 3 years (items of $3,000.00 or more):

Date	Amount	Property Transferred	To Whom	Conditions of Transfer
			(Indicate any relationship to business or its partners, directors, stockholders, or other controlling persons	

Certification

Under penalties of perjury, I declare that to the best of my knowledge and belief this statement of assets, liabilities, and other information is true, correct, and complete.

51. Signature	52. Print Name / Title	53. Date

INFORMATION REQUEST WASTE SURVEY CHART
Attachment 3-3

Name of Respondent: _____ Respondent's Location: _____ Date: _____

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO_3, Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @"x" location..
	Acids				
	Adhesives				
	Asbestos (incl. Insulation and transite piping)				
	Adsorbents (from spills, leaks, etc.)				
	Automotive Related Wastes:				
	Antifreeze				
	Batteries				
	Brake Fluids				
	Degreasers				
	Lubricants				
	Oils				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO_3, Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @"x" location..
	Oil Filters				
	Transmission fluids				
	other:				
	Batteries				
	Bleaches				
	Caustics/Alkalis				
	Chemicals				
	Cleaning compounds or fluids				
	Coolants				
	Degreasers				
	Disinfectants				
	Distillation Byproducts (Still Bottoms)				
	Dyes				
	Etching Solutions				
	Filters				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO_3, Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @"x" location..
	Flammable, Reactive, or Explosive Materials				
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes				
	Lubricants				
	Metals:				
	grindings				
	powders				
	shavings				
	sludges				
	solutions				
	other: (e.g. tanks)				
	Paint and Coating Wastes:				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO_3, Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @"x" location..
	paint				
	pigments				
	stripper				
	stains				
	thinner				
	turpentine				
	varnish				
	other:				
	PCBs (polychlorinated biphenyls)				
	Pesticides				
	Photocopying Wastes:				
	toners				
	other:				
	Photography Wastes:				
	developers				
	fixers				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO_3, Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @"x" location..
	other:				
	Plating Solutions				
	Pretreatment Sludges/Solutions (sewage)				
	Printing Wastes:				
	inks				
	dyes				
	other:				
	Rags, Used (Indicate prior use)				
	Rodenticides				
	Septic System Wastes				
	Sludges				
	Soldering Solutions				
	Solutions of Polymers, resins, plastics				
	Solvent Extracts				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO_3, Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @"x" location..
	Solvents				
	Waste Oils				
	Wood Preservatives				
	Other:				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO_3, Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @"x" location..

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	List: 1)Trade Name/Chemical Composition, 2)Name of Generator/Transporter (e.g. Nitric acid/HNO_3, Acme Surplus	Volume Accepted at Site (per month)	Disposal Method and Handling (year) (e.g. dumpster ('55-68), placed in Landfill/stored at "x" location on site/disposed in trenches @"x" location..

ATTACHMENT 3-4

SITE DESCRIPTION

The Site is located at 25 Grant Street (MBLU 49/1804/3/K) in Bridgeport, Fairfield County, CT. The Site contains two buildings, including an approximately 97,000 square-foot heavily fire-damaged former manufacturing building, with a one-to two-story portion remaining intact. The Site is bordered by Seaview Avenue and residential properties to the east, Yellow Mill Channel to the west, Grant Street to the south, and Boston Avenue to the north.

The Site is privately owned with several tenants, including Rowayton Trading Company, Inc., ("Rowayton"), an international trader of chemicals and raw materials for industries that manufacture products such as fragrances, oils, flavors, dyes, aromatics, and silicones. The space leased at 25 Grant Street was mainly used as a chemical warehouse. Reportedly, over 1,000 drums of products and raw materials, some of which were alcohol-based, were stored in the facility. Other tenants at the Site include a roofing company and a building supply company.

On September 11, 2014, a major fire consumed a portion of the facility and produced many fireballs from the exploding drums. EPA was notified of potential response activities, mobilized to the Site, and integrated into Unified Command with representatives from the City of Bridgeport, Connecticut Department of Energy and Environmental Protection ("CTDEEP") and the U.S. Coast Guard. From September 11, 2014 to September 15, 2014, EPA performed an Emergency Response consisting of: air monitoring; and surface water sampling from areas of firefighting runoff water near the building, parking lot, and from a culvert on the Yellow Mill Channel.

The fire primarily affected the part of the building leased to Rowayton, which stored drums of various chemicals in varying quantities used for chemical wholesale at the facility. Runoff from firefighting activities resulted in unknown and undetermined hazardous materials, including multiple dyes, being released into the creek behind the building, which drains into the Yellow Mill Channel and flows into Bridgeport Harbor. Due to the fumes and the multiple explosions from bursting drums, homes in the immediate vicinity were initially evacuated and local streets were shut down. An estimated 18,000 gallons/minute of water (for a total of over 20 million gallons) were sprayed on the fire.

After response activities concluded, the property owner engaged a contractor to address the remaining contamination onsite under CTDEEP oversight. However, cleanup actions were not completed. In March 2015, CTDEEP requested EPA's assistance due to the remaining hazards at the Site and lack of cleanup response by the property owner. Subsequently, EPA met with representatives from the City, CTDEEP, property owner and insurers. The property owner was given deadline to have under contract a CTDEEP-approved LSP and produce a basic Scope of Work to address the Site. However, these

conditions were not met. Subsequently, in May 2015, CTDEEP formally referred the Site to EPA to perform a removal action to address the remaining hazards onsite.

In June 2015, EPA performed a preliminary assessment/site investigation which included sampling drums/product and soil/sludge in the fire-damaged area. Results indicated that: 1) volatile organic compounds were detected in several of the drum samples and one of the soil/sludge samples; 2) semi-volatile organic compounds were detected in several of the drums samples and several of the soil/sludge samples; and 3) metals were detected in all soil/sludge samples.

Also, based on sampling results generated by the property owner's consultant, multiple samples of roofing paper and roof sheeting contained 35%-70% chrysotile asbestos.

EPA has determined that a removal action under the Comprehensive Environmental Response, Compensation and Liability Act is necessary to identify, characterize, remove and properly dispose of: 1) containerized chemicals and other incidental hazardous substances; and 2) soils, drums, containers, contaminated building materials, and non-containerized hazardous substances that may pose an imminent threat.

END OF INFORMATION REQUEST
THANK YOU FOR YOUR COOPERATION

Office of Enforcement and Compliance Assurance (2201A)
EPA-300-B-15-001 May 2015

U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

Small Business Programs
www.epa.gov/smallbusiness
EPA's Office of Small Business Programs (OSBP) advocates and fosters opportunities for direct and indirect partnerships, contracts, and sub-agreements for small businesses and socio-economically disadvantaged businesses.

EPA's Asbestos Small Business Ombudsman
www.epa.gov/sbo or 1-800-368-5888
The EPA Asbestos and Small Business Ombudsman (ASBO) serves as a conduit for small businesses to access EPA and facilitates communications between the small business community and the Agency.

EPA's Compliance Assistance Homepage
www2.epa.gov/compliance
This page is a gateway industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

EPA's Compliance Assistance Centers
www.assistancecenters.net
EPA's Compliance Assistance Centers provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture
www.epa.gov/agriculture/

Automotive Recycling
www.ecarcenter.org

Automotive Service and Repair
ccar-greenlink.org/ or 1-888-GRN-LINK

Chemical Manufacturing
www.chemalliance.org

Construction
www.cicacenter.org or 1-734-995-4911

Education
www.campuserc.org

Food Processing
www.fpeac.org

Healthcare
www.hercenter.org

Local Government
www.lgean.org

Metal Finishing
www.nmfrc.org

Paints and Coatings
www.paintcenter.org

Printing
www.pneac.org

Ports
www.portcompliance.org

Transportation
www.tercenter.org

U.S. Border Compliance and Import/Export Issues
www.bordercenter.org

EPA Hotlines, Helplines and Clearinghouses
www2.epa.gov/home/epa-hotlines
EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Some examples are:

Clean Air Technology Center (CATC) Info-line
www.epa.gov/ttn/catc or 1-919-541-0800

Superfund, TRI, EPCRA, RMP and Oil Information Center
www.epa.gov/superfund/contacts/infocenter/index.htm or 1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline
www.epa.gov/otaq/imports or 734-214-4100

National Pesticide Information Center
www.npic.orst.edu/ or 1-800-858-7378

National Response Center Hotline to report oil and hazardous substance spills - www.nrc.uscg.mil or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC) - www.epa.gov/opptintr/ppic or 1-202-566-0799

Safe Drinking Water Hotline - www.epa.gov/drink/hotline/index.cfm or 1-800-426-4791

Stratospheric Ozone Protection Hotline
www.epa.gov/ozone/comments.htm or 1-800-296-1996

Toxic Substances Control Act (TSCA) Hotline
tsca-hotline@epa.gov or 1-202-554-1404

Small Entity Compliance Guides
http://www.epa.gov/sbrefa/compliance-guides.html
EPA publishes a Small Entity Compliance Guide (SECG) for every rule for which the Agency has prepared a final regulatory flexibility analysis, in accordance with Section 604 of the Regulatory Flexibility Act (RFA).

Regional Small Business Liaisons
http://www.epa.gov/sbo/rsbl.htm
The U.S. Environmental Protection Agency (EPA) Regional Small Business Liaison (RSBL) is the primary regional contact and often the expert on small business assistance, advocacy, and outreach. The RSBL is the regional voice for the EPA Asbestos and Small Business Ombudsman (ASBO).

State Resource Locators
www.envcap.org/statetools
The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

State Small Business Environmental Assistance Programs (SBEAPs)
www.epa.gov/sbo/507program.htm
State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits.

EPA's Tribal Portal
www.epa.gov/tribalportal/
The Portal provides access to information on environmental issues, laws, and resources related to federally recognized tribes.

EPA Compliance Incentives
EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated, businesses may be eligible for penalty waivers or reductions. EPA has two such policies that may apply to small businesses:

EPA's Small Business Compliance Policy
www2.epa.gov/enforcement/small-businesses-and-enforcement
This Policy offers small businesses special incentives to come into compliance voluntarily.

EPA's Audit Policy
www2.epa.gov/compliance/epas-audit-policy
The Policy provides incentives to all businesses that voluntarily discover, promptly disclose and expeditiously correct their noncompliance.

Commenting on Federal Enforcement Actions and Compliance Activities
The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System designation, number of employees or annual receipts, as defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

Your Duty to Comply
If you receive compliance assistance or submit a comment to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.