Andrea Fasolina
212.453.0727(direct)
Afasolina@GRSM.COM

GORDON&REES
SCULLY MANSUKHANI

ATTORNEYS AT LAW
1 BATTERY PARK PLAZA
28TH FLOOR
NEW YORK, NY 10004
PHONE: (212) 269-5500
FAX: (212) 269-5505
WWW.GORDONREES.COM

November 15, 2018

VIA WEBSITE SUBMISSION ONLY

Environmental Protection Agency

Re: ***Stanley Peterson and Debby Peterson v. Occidental Chemical Corporation, et al.***
Supreme Court of the State of New York County of New York
Index No.: 190169/2018

Dear Sir/Madam:

Please consider the following a formal request pursuant to the New York Freedom of Information Law, Article 6 of the Public Officers Law, I hereby request a copy of any and all documents, records, correspondence, contracts, reports, logs, test results, permits, citations/violations, hazardous waste disposal manifests, or any other records in any form (written or digital) pertaining to:

Lake Area Technical Institute
1201 Arrow Ave. NE
Watertown, SD 57201

Midway Industries
a/k/a Family Farmers & Ranchers, Inc.
a/k/a Donald Hjermstad
190 North Lake Drive
Watertown, SD 57201

Minnesota Rubber & Plastics
a/k/a Quadee Rubber Company
600 Quadee Drive
Watertown, SD 57201

Nonnahs, Inc.
600 Oakwood Road
Watertown, SD 57201

Solar Gas, Inc.
Watertown, SD

Tescom Corporation
2601 Lockheed Avenue
Watertown, SD 57201

Smith Equipment Manufacturing Company, LLC
a/k/a Smith Equipment
a/k/a Illinois Tool Works, Inc.
2601 Lockheed Ave
Watertown, SD 57201

Arcsmith, Inc.
a/k/a Illinois Tool Works, Inc.
2601 Lockheed Ave
Watertown, SD 57201

Illinois Tool Works, Inc.
2601 Lockheed Ave
Watertown, SD 57201

Lakeside Ceramics
a/k/a Unique Designs by Lakeside Ceramics
4501 N. Highway 20
Watertown, SD 57201

With respect to the location above, please accept this letter as a request for copies of the following documents specifically during the timeframe of **1960 to present**.

- Any and all records regarding asbestos;
- Any and all records regarding inspections for asbestos;
- Any and all records regarding installation or removal of asbestos;
- Any and all records pertaining to use of asbestos-containing products and asbestos-containing equipment;
- Any and all records regarding policies, procedures, inspection reports, asbestos management plans, and asbestos abatement actions performed pursuant to any other applicable governing authorities, including but not limited to, OSHA;
- Any and all records relating to air testing, or other dust-release testing performed and any and all asbestos analysis data sheets;
- Any and all records relating to asbestos remediation, including those that identify asbestos removal contractors and any contracts or reports for the removal of asbestos; and
- Any and all specification sheets for insulating materials, including but not limited to pipe insulation.

In order to help you to determine my status to assess fees, please note that we are seeking the above information for use in a pending lawsuit. I am willing to pay fees for this request up to a maximum of $100.00. If you estimate that the fees will exceed this limit, please contact me first.

If you deny any part of this request, please cite each specific reason you believe justifies your refusal to release the information and notify me of the applicable appeal procedures available under the law.

If you have any questions regarding the processing of this request, please do not hesitate to contact the undersigned. Thank you for your consideration of my request.

Regards,

Gordon Rees Scully Mansukhani, LLP

Andrea Fasolina
Paralegal