From: Flower, Jason
To: Chiccine, Catherine; Fanning, Daniel
Subject: RE: Question re Findett FOIA
Date: Wednesday, May 26, 2021 11:28:53 AM

Cathie,

The 2020 ATP documents work for now with the understanding that we may request the 1990 ATP docs in the future and we'd appreciate you agreeing that we would not need to submit another FOIA request if we get to that point.

We're more interested in any documents you have related to the corporate history of Findett and SantoLubes (and their many affiliated entities). We're holding on responding to your email on SantoLubes until we get the FOIA response but there are so many inconsistencies in their 104(e) responses that it is hard to sort through them. One important piece of information seems to be an agreement from September 2003 whereby, according to Garrison and Findett, Arch Technology Holdings acquired 100% of the equity of Findett Corporation (which is the entity that signed the OU1 CD). Then, Findett/Garrison says that Arch Technology became SantoLubes. Did you get the 2003 equity purchase agreement? We requested it from Findett/Garrison a few years ago and were told that it existed but they refused to share it.

Also, I expect not because we should have been notified but did you reach an ATP settlement with Garrison and/or a Findett entity?

Let me know if you have any questions.

Thanks,
Jason

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From: Chiccine, Catherine <chiccine.catherine@epa.gov>
Sent: Tuesday, May 25, 2021 3:34 PM
To: Fanning, Daniel <Daniel.Fanning@huschblackwell.com>; Flower, Jason <Jason.Flower@huschblackwell.com>
Subject: Question re Findett FOIA

[EXTERNAL EMAIL]

Jason and Daniel,

Are there any date ranges you want for request number 1, regarding documents Findett submitted as to its ability to pay? As you know, Findett submitted ATP documents in 2020 and we are producing those. But Findett also submitted ATP documents back in the 1990s, the first time an

ability-to-pay analysis was conducted. Obtaining those will take significantly more time and effort as they are only on paper and have not been uploaded to our electronic records system. I'm assuming you want Findett's most recent ATP information, so I wanted to confirm with you before I continue my search for older ATP documents.

Thanks,

Cathie Chiccine| Attorney-Advisor
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