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ATTORNEY AT LAW

Sent via Electronic Mail to: r4foia@epa.gov

May 21, 2013

Regional FOIA Officer
U.S. EPA, Region 4
AFC Building, 9th Floor
61 Forsyth Street, SW
Atlanta, GA 30303-8960

RE: *Freedom of Information Act (5 U.S.C. §552, as amended) Request.*

Dear Regional FOIA Officer,

In accordance with the Freedom of Information Act (5 U.S.C. § 552) and with the regulations of the U.S. Environmental Protection Agency, we are requesting copies of documents, not limited to but including all letters, notes, as well as other communications to and from Reynolds Metals Company at 1065 River Road, Muscle Shoals, AL 35661-1155 regarding the following:

1. All documents regarding Sanctions, Notices of Deficiencies, Notices of Violations, Administrative Orders, Written Warnings, Penalties, Civil Penalties and Criminal Charges concerning facility in question from 1970 through 1980;

2. All documents containing atmospheric contamination, respirators, respiratory protection program and asbestos air monitoring documentation for facility in question from 1970 through 1980; and

3. All documents concerning on-site inspections, worker complaints and referrals of facility in question from 1970through 1980.

Further, in accordance with the Freedom of Information Act (5 U.S.C. § 552), we are requesting copies of documents, memoranda, blueprints, and other papers regarding the following:

1. The nature of new construction of all or any part of facility in question at 1065 River Road, Muscle Shoals, AL 35661-1155;

2. Identify by type of product, quantity used, location used, and manufacturer/brand/trade name, any and all asbestos-containing products applied, installed, used, stripped, removed and/or disturbed during its original construction, each and every expansion, addition of new construction and/or destruction/demolition operations for facility in question;

Illinois	Missouri	South Carolina	California
2 Club Centre Court, Ste. 4	211 N. Broadway, Ste. 2940	300 W. Coleman Blvd., Ste. 200	70 Washington Street, Ste. 425
Edwardsville, IL 62025	St. Louis, MO 63102	Mount Pleasant, SC 29464	Oakland, CA 94607
Tel: 618.655.0439	Tel: 314.241.2003	Tel: 843.388.1330	Tel: 800.358.5922
Fax: 618.655.0659	Fax: 314.241.4838	Fax: 803.753.9931	Fax: 314.241.4838

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3. Identify any maps, plans, drawings, pictures, blueprints, schematics and/or like documents showing the layout of the facility, including changes or differences occurring over time of facility in question;

4. Identify any and all documents, including but not limited to, contracts, specifications, blueprints, schematics, drawings, designs, invoices, vouchers, plans, maps, surveys, reports, change orders, cancelled checks and/or work orders referring to, relating to and/or reflecting the application, installation, stripping and/or removal of asbestos-containing products during original construction, each expansion, addition and/or new construction, and/or destruction/demolition operations for facility in question; and

5. The nature of any and all expansions, additions and/or destruction/demolition operations for the facility located at 1065 River Road, Muscle Shoals, AL 35661-1155, including but not limited to those operations necessary for the re-opening of the plant in 1954.

This request is not meant to be exclusive of any other records which, though not specifically requested, would have a reasonable relationship to the subject matter of this request.

In the event that access to any of the requested records is denied, please note that the FOIA provides that if only portions of a requested file are exempted from release, the remainder must still be released. I therefore request that I be provided with all non-exempt portions which are reasonably segregable. I further request that you describe the deleted material in detail and specify the statutory basis for the denial as well as your reasons for believing that the alleged statutory justification applies in this instance. Please separately state your reasons for not invoking your discretionary powers to release the requested documents in the public interest. Such statements will be helpful in deciding whether to appeal an adverse determination, and in formulating arguments in case an appeal is taken.

In order to help to determine my status to assess fees, you should know that I am affiliated with a private corporation seeking information for company business use. I am willing to pay fees for this request.

If you have any questions, or would like to discuss this matter, please feel free to contact me. Thank you for your professional courtesies in this regard.

Sincerely,

Margaret Samadi

Margaret Samadi, Esq.

MS/cs