UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NEW YORK 10007-1866

April 10, 2020

PROMPT REPLY NECESSARY
VIA EMAIL

Attn: John F. Cayton, Esq.
Paddock Enterprises, LLC (formerly Owens-Illinois, Inc.)
One Michael Owens Way, Plaza One
Perrysburg, OH 43551-2999
John.Cayton@o-i.com

Re: Supplemental Request for Information Pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act, § 9604(e), relating to the PROTECO Site in Peñuelas, Puerto Rico

Dear Mr. Cayton:

The United States Environmental Protection Agency ("EPA") is charged with responding to releases or threatened releases of hazardous substances, pollutants, and/or contaminants into the environment, and with enforcement responsibilities under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. §§ 9601-9675 ("CERCLA"), also known as the "Superfund" law. For your information, a copy of the Superfund law may be found at www.epa.gov/superfund.

This letter seeks your cooperation in providing information and documents related to the contamination of the PROTECO Site ("the Site") and to supplement the information provided in Owens-Illinois, Inc.'s June 3, 2019 response to EPA's March 28, 2019 Request for Information. We encourage you to give this matter your immediate attention and request that you provide a complete and truthful response to the attached Supplemental Request for Information **within 21 calendar days** of your receipt of this letter.

EPA has documented the release or threatened release of hazardous substances into the environment at the Site. Pursuant to CERCLA, EPA has spent public funds and anticipates spending additional public funds at the Site. Background information concerning the Site was provided in EPA's March 28, 2019 Request for Information.

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REQUEST FOR INFORMATION

Under Section 104(e)(2) of CERCLA, 42 U.S.C. § 9604(e)(2), EPA has broad information gathering authority to require persons to provide the following: information and/or documents relating to materials generated, treated, stored, or disposed of at, or transported to a facility; the nature or extent of a release or threatened release of a hazardous substance, pollutant, or contaminant at or from a facility; and the ability of a person to pay for or perform a cleanup.

While EPA seeks your cooperation in this investigation, your compliance with the attached Supplemental Request for Information is required by law. In preparing your response to this Supplemental Request for Information, please follow the instructions provided in Attachment A.

When you have prepared your response to the Supplemental Request for Information, please sign and have notarized the enclosed "Certification of Answers to Request for Information," and return and/or scan and email that Certification to EPA along with your response. Please note that false, fictitious, or fraudulent statements or representations may subject you to civil or criminal penalties under federal law. In addition, Section 104 of CERCLA, 42 U.S.C. § 9604, authorizes EPA to pursue penalties for failure to comply with a Request for Information.

Some of the information EPA is requesting may be considered by you to be confidential business information. Please be aware that you may not withhold the information on that basis. If you wish EPA to treat all or part of the information confidentially, you must advise EPA of that fact by following the procedures described in the Instructions included in Attachment A, including the required support of your claim of confidentiality.

If you have information about other parties who may have information that may assist EPA in its investigation of the Site or who may be responsible for the material stored or disposed of at the Site, that information should be submitted within the time frame noted above. Please note that if after submitting your response you obtain additional or different information concerning the matters addressed by this Supplemental Request for Information, you must promptly notify EPA and turn over the additional or different information to EPA.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §§ 3501-3520.

Your response to this Supplemental Request for Information, which we encourage you to submit electronically, should be sent to the following:

Andrea Leshak, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, New York 10007-1866
leshak.andrea@epa.gov

and to:

Zolymar Luna
Caribbean Environmental Protection Division
U.S. Environmental Protection Agency, Region 2
City View Plaza II, Suite 7000
#48 Rd 165, km 1.2
Guaynabo, Puerto Rico 00968-8069
luna.zolymar@epa.gov

If you have any questions regarding this letter, or would like to discuss the matter with EPA, you may call Ms. Luna at (787) 977-5844 or email her at the email address listed above. Please direct all inquiries from an attorney to Ms. Leshak at (212) 637-3197 or at the email address listed above.

We appreciate your attention to this matter and look forward to your prompt response to this letter.

Sincerely yours,

Eric J. Wilson
Acting Director
Superfund and Emergency Management Division

Enclosures

Cc: Kegan A. Brown (Kegan.Brown@lw.com)
Christopher Antonacci (Christopher.Antonacci@lw.com)

ATTACHMENT A

INSTRUCTIONS FOR RESPONDING TO REQUEST FOR INFORMATION

DIRECTIONS

1. Answer Every Question Completely. A separate response must be made to each of the questions set forth in this Supplemental Request for Information. For each question contained in **Attachment B** of this letter, if information responsive to this Supplemental Request for Information is not in your possession, custody, or control, please identify the person(s) from whom such information may be obtained.

2. Number Each Answer. Precede each answer with the corresponding number of the question and the subpart to which it responds.

3. Provide the Best Information Available. Provide responses to the best of your 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 and/or agents. Submission of cursory responses when other responsive information is available to you will be considered non-compliance with this Supplemental Request for Information. Whenever in this Supplemental Request for Information there is a request to identify a natural person or an entity, state, among other things, the person or entity's full name and present or last known address.

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

5. Inability to Answer or Provide Documents. If you are unable to answer a question in a detailed and complete manner or if you are unable to provide any of the information or documents requested, indicate the reason for your inability to do so. If you have reason to believe that there is an individual who may be able to provide more detail or documentation in response to any question, state that person's name and last known address and telephone number and the reason for your belief.

6. Documents. If anything is deleted from a document produced in response to this Supplemental Request for Information, state the reason for, and the subject matter of, the deletion.

7. Continuing Obligation to Provide and to Correct Information. If additional information or documents responsive to this Supplemental Request for Information become known or available to you after you respond to this Supplemental Request for Information, EPA hereby requests pursuant to Section 104(e) of CERCLA that you supplement your response to EPA. If after submitting your response, you discover that information you submitted is incorrect, it is necessary that you promptly notify EPA and correct such information.

8. 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). If you make a claim of confidentiality for any of the information you submit to EPA, you must separately address the following points:

   a. the portions of the information alleged to be entitled to confidential treatment;
   b. the period of time for which confidential treatment is desired (e.g., until a certain date, until the occurrence of a specific event, or permanently);
   c. measures taken by you to guard against the undesired disclosure of the information to others;
   d. the extent to which the information has been disclosed to others, and the precautions taken in connection therewith;
   e. pertinent confidentiality determinations, if any, by EPA or other federal agencies, and a copy of any such determinations or reference to them, if available; and
   f. whether you assert that disclosure of the information would likely result in substantial harmful effects on your business' competitive position, and if so, what those harmful effects would be, why they should be viewed as substantial, and an explanation of the causal relationship between disclosure and such harmful effects.

   To make a confidentiality claim, please stamp or type "CONFIDENTIAL" on all responses and any related documents you assert to be confidential. Confidential portions of otherwise non-confidential documents should be clearly identified. You should indicate a date, if applicable, after which the information need no longer be treated as confidential. Please submit your response so that all non-confidential information, including any redacted versions of documents, are in one envelope and all materials for which you desire confidential treatment are in another envelope.

   All confidentiality claims are subject to EPA review. It is important that you satisfactorily show that you have taken reasonable measures to protect the confidentiality of the information and that you intend to continue to do so and that it is not and has not been obtainable by legitimate means without your consent. Information covered by such claim will be disclosed by EPA only to the extent permitted by Section 104(e)(7) of CERCLA and EPA's pre-disclosure notification procedures. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. EPA provides no assurances that all information that you assert as confidential business information will not be publicly disclosed. Any determination regarding public disclosure will be based on a review of the information and relevant countervailing factors.

9. Disclosure to EPA Contractor. Information that you submit in response to this Supplemental Request for Information may be disclosed by EPA to authorized

representatives of the United States, pursuant to 40 C.F.R. Part 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA may disclose all responses to this Supplemental Request for Information to one or more of its private contractors for the purpose of organizing and/or analyzing the information contained in the responses to this Supplemental Request for Information. Pursuant to 40 C.F.R. Part 2.310(h), private contractors must sign a contractual agreement that prohibits the disclosure of such information to anyone other than EPA without the prior written approval of each affected business or of an EPA legal office. If you are submitting information that you assert is entitled to treatment as confidential business information, you may comment on this potential disclosure within fourteen (14) days of receiving this Supplemental Request for Information.

10. 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."

11. Objections to Questions. If you have objections to some or all the questions within the Request for Information letter, you are still required to respond to each of the questions.

DEFINITIONS

The following definitions shall apply to the following words insofar as they appear in this Supplemental Request for Information.

1. The term "arrangement" means every separate contract or other agreement between two or more persons, whether written or oral.

2. The term "documents" includes any written, recorded, computer-generated, visually, or aurally reproduced material of any kind in any medium in your possession, custody, or control or known by you to exist, including originals, all prior drafts, and all non-identical copies.

3. The term "entity" or "entities" refers to persons, individuals, companies, partnerships, or any other type of business association.

4. The term "Facility" shall mean the location of the Owens-Illinois de Puerto Rico facility located at Road 690 KM 1.1 in Vega Alta, Puerto Rico.

5. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA, 42 U.S.C. § 9601(14), and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances. The substances that have been designated as hazardous substances pursuant to Section 102(a) of

CERCLA, 42 U.S.C. § 9602(a), (which, in turn, comprise a portion of the substances that fall within the definition of "hazardous substance" under Section 101(14) of CERCLA) are set forth at 40 C.F.R. Part 302.

6. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of the Resource Conservation and Recovery Act, as amended ("RCRA"), 42 U.S.C. § 6903(5).

7. The term "identify" means, with respect to a natural person, to set forth the person's full name, present or last known employer, business address, and business telephone number, as well as the present or last known home address and home telephone number. With respect to a corporation, partnership, or other business entity (including a sole proprietorship), the term "identify" means to provide its full name, address, and any affiliation or contractual relationship it has with the individual and/or Company to whom/which this Supplemental Request for Information is addressed.

8. The term "industrial waste" shall mean any solid, liquid, or sludge or any mixtures thereof that possess <u>any</u> of the following characteristics:

   a. it contains one or more "hazardous substances" (at any concentration) as defined in Section 101(14) of CERCLA;
   b. it is a "hazardous waste" as defined in Section 1004(5) of RCRA;
   c. it has a pH less than 2.0 or greater than 12.5;
   d. it reacts violently when mixed with water;
   e. it generates toxic gases when mixed with water;
   f. it easily ignites or explodes;
   g. it is an industrial waste product;
   h. it is radioactive;
   i. it is an industrial treatment plant sludge or supernatant;
   j. it is an industrial byproduct having some market value;
   k. it is coolant water or blowdown waste from a coolant system;
   l. it is a spent product that could be reused after rehabilitation; or
   m. it is any material that you have reason to believe would be toxic if either ingested, inhaled, or placed in contact with skin.

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

10. The term "Owens-Illinois, Inc." shall mean the company that merged into Paddock Enterprises, LLC in December 2019.

11. The term "Owens-Illinois de Puerto Rico" or "OIPR" shall mean the company or commercial partnership that operated the Owens-Illinois de Puerto Rico facility located at Road 690 KM 1.1 in Vega Alta, Puerto Rico beginning in the mid-1970s.

12. The term “Owens-Illinois de Puerto Rico, LLC” or “OIPR, LLC” shall mean the company that was incorporated in the state of Delaware in 2001 and that operated the Owens-Illinois de Puerto Rico facility located at Road 690 KM 1.1 in Vega Alta, Puerto Rico until it closed in July 2007.

13. The term “person” shall include any individual, firm, unincorporated association, partnership, corporation, trust, or other entity.

14. The term “release” shall have the same definition as that contained in Section 101(22) of CERCLA, which includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.

15. The term “Site” shall mean the PROTECO Site, including the real property located at Road 385, Km 4.4, Bo. Tallaboa, Peñuelas, Puerto Rico.

16. The term “treatment” or “treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.

17. 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.

18. The term “waste transporters” shall mean persons who picked up hazardous substances from the Company or who otherwise transported hazardous substances away from the Company’s Facility.

19. The term “you” shall mean the addressee of this Supplemental Request for Information.

20. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA or RCRA, in which case the statutory definitions shall apply.

ATTACHMENT B

REQUEST FOR INFORMATION

1. Answer the following questions regarding the entity known as Owens-Illinois de Puerto Rico ("OIPR"), which we believe commenced operations at the Facility in the mid-1970s and arranged for the disposal of hazardous substances at the Site in or around 1985:

    a. State the correct legal name and mailing address for OIPR;
    b. State the name(s) and address(es) of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of OIPR;
    c. Identify the state/commonwealth and date of incorporation of OIPR and the name of its agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different; and
    d. Identify any successor corporations, predecessor corporations, or other entities related to OIPR. If OIPR is or was a subsidiary or affiliate of another corporation or other entity, identify each of those other entities' Chief Executive Officers, Presidents, and Chairpersons of the Board. Identify the state/commonwealth of incorporation and agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different, for each entity identified in your response to this question.

2. State the corporate history of OIPR, including all name changes and mergers. List all names under which OIPR has operated and has been incorporated. For each other name, provide the following information:

    a. Whether that other company or business continues to exist, and if it is no longer in business indicate the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale);
    b. Names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
    c. Names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations, if any, of each other company.

3. Identify all changes in ownership relating to OIPR from its date of incorporation to the present, including the date of any ownership change. If any owner was/is a corporation, identify if the corporation was a subsidiary or division of another corporation. In your identification of any corporation, it is requested that you provide the full corporate name, the state/commonwealth of incorporation, and all fictitious names used/held by that corporation.

4. Provide copies of OIPR's authorization to do business in Puerto Rico. Include all authorizations, withdrawals, suspensions, and reinstatements.

5. State the dates during which OIPR owned, operated, or leased any portion of the Facility, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including but not limited to purchase and sale agreements, deeds, leases, etc.

6. Describe in detail Owens-Illinois, Inc.'s (now Paddock Enterprises, LLC) relationship with OIPR and the Facility. Indicate whether the corporate relationship between OIPR and Owens-Illinois, Inc. changed over the years, and, if so, explain how the relationship changed. Respond to each of the following requests regarding the relationship:

    a. State the date on which Owens-Illinois, Inc. acquired ownership or an interest in OIPR and the Facility. State the prior owners, if any, of OIPR and the Facility. Submit a copy of all documents relating to Owens-Illinois, Inc.'s purchase of OIPR and the Facility.
    b. Indicate whether Owens-Illinois, Inc. sold or otherwise divested itself of any stock, assets, or other interest in OIPR or any other company that operated the Facility. Fully describe the nature of the sale and/or transaction. State if the transaction consisted of a merger, consolidation, sale or transfer of assets, and provide all documents relating to such transaction, including all documents pertaining to any agreements, express or implied, for the purchasing corporation to assume the liabilities of the selling corporation.
    c. Indicate whether Owens-Illinois, Inc. retained the liabilities of OIPR for events prior to the sale.

7. According to court records, OIPR was a commercial partnership, and Owens-Illinois, Inc. was a principal partner and parent company of OIPR. Please confirm this arrangement and/or provide the partnership agreement governing OIPR and any relevant records concerning the OIPR partnership and the corporate relationship between OIPR and Owens-Illinois, Inc. (now Paddock Enterprises, LLC).

8. Describe all other corporate transactions that apply to OIPR. This is to include all transactions between OIPR and any and all of the following:

    a. Affiliated business entities, affiliated partnerships, or other business entities that although not owned by this partnership may have the same owner/investor;
    b. The parent corporate entity, all subsidiary entities of the parent corporation, and all subsidiaries of this corporation; and
    c. The stockholders of this corporation.

9. Indicate whether Owens-Illinois, Inc. (now Paddock Enterprises, LLC) is the successor to any liabilities, including those under CERCLA, of OIPR, and provide an explanation for your answer.

10. Describe the corporate relationship between OIPR and Owens-Illinois de Puerto Rico, LLC ("OIPR, LLC"). Indicate whether OIPR, LLC is the successor to OIPR.

11. Answer the following questions regarding OIPR, LLC:

    a. State the correct legal name and mailing address for OIPR, LLC;
    b. State the name(s) and address(es) of the President, Chief Executive Officer, and the Chairman of the Board (or other presiding officer) of OIPR, LLC;
    c. Identify the state/commonwealth and date of incorporation of OIPR, LLC and the name of its agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different; and
    d. Identify any successor corporations, predecessor corporations, or other entities related to OIPR, LLC. If OIPR, LLC is or was a subsidiary or affiliate of another corporation or other entity, identify each of those other entities' Chief Executive Officers, Presidents, and Chairpersons of the Board. Identify the state/commonwealth of incorporation and agents for service of process in the state/commonwealth of incorporation and in Puerto Rico, if different, for each entity identified in your response to this question.

12. State the corporate history of OIPR, LLC, including all name changes and mergers. List all names under which OIPR, LLC has operated and has been incorporated. For each other name, provide the following information:

    a. Whether that other company or business continues to exist, and if it is no longer in business indicate the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale);
    b. Names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel; and
    c. Names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations, if any, of each other company.

13. Identify all changes in ownership relating to OIPR, LLC from its date of incorporation to the present, including the date of any ownership change. If any owner was/is a corporation, identify if the corporation was a subsidiary or division of another corporation. In your identification of any corporation, it is requested that you provide the full corporate name, the state/commonwealth of incorporation, and all fictitious names used/held by that corporation.

14. Provide copies of OIPR, LLC's authorization to do business in Puerto Rico. Include all authorizations, withdrawals, suspensions, and reinstatements.

15. State the dates during which OIPR, LLC owned, operated, or leased any portion of the Facility, and provide copies of all documents evidencing or relating to such ownership, operation, or lease, including but not limited to purchase and sale agreements, deeds, leases, etc.

16. Describe in detail Owens-Illinois, Inc.'s (now Paddock Enterprises, LLC) relationship with OIPR, LLC and the Facility. Indicate whether the corporate relationship between OIPR and Owens-Illinois, Inc. changed over the years, and, if so, explain how the relationship changed. Respond to each of the following requests regarding the relationship:

    a. State the date on which Owens-Illinois, Inc. acquired ownership or an interest in OIPR, LLC and the Facility. State the prior owners, if any, of OIPR, LLC and the Facility. Submit a copy of all documents relating to Owens-Illinois, Inc.'s purchase of OIPR, LLC and the Facility.
    b. Indicate whether Owens-Illinois, Inc. sold or otherwise divested itself of any stock, assets, or other interest in OIPR, LLC or any other company that operated the Facility. Fully describe the nature of the sale and/or transaction. State if the transaction consisted of a merger, consolidation, sale or transfer of assets, and provide all documents relating to such transaction, including all documents pertaining to any agreements, express or implied, for the purchasing corporation to assume the liabilities of the selling corporation.
    c. Indicate whether Owens-Illinois, Inc. retained the liabilities of OIPR, LLC for events prior to the sale.

17. Describe all other corporate transactions that apply to OIPR, LLC. This is to include all transactions between OIPR, LLC and any and all of the following:

    a. Affiliated business entities, affiliated partnerships, or other business entities that although not owned by this partnership may have the same owner/investor;
    b. The parent corporate entity, all subsidiary entities of the parent corporation, and all subsidiaries of this corporation; and
    c. The stockholders of this corporation.

18. Indicate whether Owens-Illinois, Inc. (now Paddock Enterprises, LLC) is the successor to any liabilities, including those under CERCLA, of OIPR, LLC, and provide an explanation for your answer.

19. According to Owens-Illinois, Inc.'s June 3, 2019 Response to EPA's March 28, 2019 Request for Information, on or about August 2001, United Caribbean Container, Ltd, a Cayman Islands corporation, took 100% ownership of OIPR, LLC. Please respond to the following requests regarding this transaction:

    a. Provide a copy of the agreement of sale as well as all attachments and amendments to this agreement of sale, including related agreements such as exclusive service contracts, non-compete agreements or consulting agreements, that document each asset sold as well as the consideration paid for each and every asset.
    b. In addition to the documentation requested in Request #19.a., above, identify all consideration paid for the assets. In identifying the consideration, provide the

amount paid in cash, the amount paid in promissory notes or other form of debenture payable to the entity and/or officers, directors and/or shareholders of the entity selling the assets, the value associated with the assumption of liabilities (if assumption of liabilities are involved, you are also to identify the types of liabilities assumed), the value associated with the performance of services, the value associated with shares of stock exchanged as part of the sale, and the type and value associated with any other form of consideration not identified above.

20. Please provide all documents, if not already requested above, that support your responses to Requests #1 - #19, above.

21. If you have reason to believe that there may be persons able to provide a more detailed or complete response to any question contained herein or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

22. State the name, title, and address of each individual who assisted or was consulted in the preparation of the response to this Supplemental Request for Information. In addition, state whether this person has personal knowledge of the information in the answers provided.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State/Commonwealth of _____

County/Municipality of _____

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

_____
NAME (print or type)

_____
TITLE (print or type)

_____
SIGNATURE

Sworn to before me this

_____day of_____ 2020.

Notary Public