UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
BOSTON, MA 02109-3912

March 30, 2012

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. George A. Bates, President
Shield Packaging Company, Inc.
99 University Road
Canton, MA 02021

Mr. A. Bruce Simpson, Vice President of Operations
Shield Packaging Company, Inc.
50 Oxford Avenue
Dudley, MA 01571

Re: Request for Information Issued Pursuant to Section 114(a)(1) of the Clean Air Act ("CAA"), 42 U.S.C. § 7414(a)(1), and Section 3007 of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927

Dear Messrs. Bates and Simpson:

On December 9, 2010, representatives from the United States Environmental Protection Agency ("EPA") Region 1 conducted an inspection of Shield Packaging Company, Inc. ("Shield"), located at 50 Oxford Avenue, Dudley, Massachusetts (the "Facility"). The purpose of this inspection was, in part, to determine Shield's compliance with Section 112(r) of the amended Clean Air Act ("CAA"), 42 U.S.C. § 7412(r) and implementing regulations set forth at 40 C.F.R. Part 68. CAA Section 112(r) and its implementing regulations mandate a federal focus on the prevention of chemical accidents. The objective of Section 112(r) is to prevent accidental releases of substances that can cause serious harm to public health and the environment. Under these requirements, industry has the obligation to prevent chemical releases by (1) identifying hazards that might result in such releases, using appropriate hazard assessment techniques; (2) designing and maintaining a safe facility; and (3) minimizing the consequences of releases that do occur.

On April 6-7, 2011, representatives from EPA Region 1 conducted another inspection of the Facility. The purpose of this inspection was, in part, to determine Shield's compliance with the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 *et seq.*, and its implementing regulations. The objective of RCRA is to provide a statutory framework that will ensure the proper management of hazardous wastes. Under these requirements, generators of hazardous waste are responsible for determining whether their waste is hazardous and must

identify, accumulate, store, manage, and ship their wastes off-site in accordance with management standards specified by RCRA regulations.

Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1), gives EPA the authority to require a company to submit such information as EPA may reasonably require to determine its compliance with the CAA. Likewise, Section 3007 of RCRA, 42 U.S.C. § 6927, authorizes EPA to obtain information from companies that that generate, store, treat, transport, dispose of, or otherwise handle hazardous wastes about such wastes. To enable EPA to determine the compliance status of the Facility, responses to Questions 1 and 18-21 of the enclosed list of questions (Attachment 2) must be furnished within thirty (30) calendar days of your receipt of this letter, and responses to Questions 2-17 must be furnished within forty-five (45) calendar days of your receipt of this letter.

Compliance with this Information Request is mandatory. Failure to respond fully and truthfully, or to adequately justify any failure to respond, within the timeframe specified above can result in an enforcement action by EPA pursuant to Section 113 of the CAA, 42 U.S.C. § 7413, and Section 3008 of RCRA, 42 U.S.C. § 6928. These statutes permit EPA to seek the imposition of penalties. This reporting requirement is not subject to Office of Management and Budget review under the Paperwork Reduction Act. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties.

You are required to submit the above-referenced information within the timeframe specified above to:

Susann D. Nachmann, Environmental Engineer
RCRA, EPCRA, and Federal Facilities Unit
U.S. EPA, Region 1
5 Post Office Square, Suite 100
Mail Code OES05-1
Boston, MA 02109-3912

As part of your response, please complete the enclosed declaration (Attachment 1) and provide a cover letter carefully specifying what documentation is included to answer each question. If you have any questions regarding this Information Request, please contact Laura J. Berry, Esq. of my staff at (617) 918-1148.

Sincerely,

Susan Studlien

Susan Studlien, Director
Office of Environmental Stewardship

Enclosures

cc: Susann D. Nachmann, EPA
Leonard Wallace, EPA
Laura J. Berry, EPA

ATTACHMENT 1

Instructions: Complete and Include With Your Response.

DECLARATION

I declare under penalty of perjury that I am

the _____ of _____,
[Title] [Name of Facility]

that I am authorized to respond on behalf of

_____, and that the foregoing is a
[Name of Facility]

complete, true, and correct response.

Executed on _____ _____
[Date] [Signature]

_____
[Type Name and Title]

ATTACHMENT 2

SHIELD PACKAGING COMPANY, INC. ("SHIELD")
INFORMATION REQUEST

Guidance on How to Respond. You must submit all responsive documents. Please respond separately to each of the questions, referencing each question by paragraph or subparagraph number in your answer. The response must include copies of all documents that you reference in your response or which you feel are relevant to the information being requested.

As part of your response, please complete the enclosed declaration (Attachment 1) and provide a cover letter carefully specifying what documentation is included to answer each question. (If documents requested in response to one item duplicate those requested by another question, submit only one copy of the documentation.) Your submission must be a self-explanatory, complete response that is dated and signed by an authorized facility official.

Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to these questions become known or available after answering this request, including, but not limited to, specific information that may be deemed unknown at the time of your response, EPA hereby requests, pursuant to Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1), and Section 3007 of RCRA, 42 U.S.C. § 6927, that you supplement your response to EPA within ten (10) days of discovering such information. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is incomplete or misrepresents the truth, notify Susann D. Nachmann of this fact as soon as possible and provide EPA with a corrected response.

Confidential Business Information. The information requested herein must be provided even though Shield may contend that it includes possible confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Section 114(c) of the CAA, 42 U.S.C. § 7414(c), Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), and 40 C.F.R. Section 2.203(b), by attaching to such information at the time it is submitted a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret," or "proprietary," or "company confidential." Information covered by such a claim will be disclosed by EPA only to the extent, and only by means, of the procedures set forth in the statute and regulation identified above. 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. 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.

Please note the burden of proof is on you to demonstrate that information claimed as confidential satisfies the criteria set forth in 40 C.F.R. § 2.208. If any portion of your response contains information which you claim as confidential, you must submit two copies of any such "confidential business information" in accordance with the following procedures:

1) The first copy of any document containing such "confidential business information" must be complete and contain all information. Additionally, each such page must be marked conspicuously to indicate that it is claimed as confidential.

2) The second copy of any document that is subject to a CBI claim must be redacted so that it contains only information that is not claimed as confidential.

Definitions. The following definitions shall apply to the following words as they appear in this Attachment 2:

The term "you" or "Shield Packaging" or "Shield" shall include Shield Packaging Company, Inc., the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.

The term "person" shall have the same definition as in Section 302(e) of the CAA and Section 1004(15) of RCRA, (*i.e.*, an individual, trust, firm, joint stock company, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, interstate body, or any agency, department, or instrumentality of the United States, and any officer, agent, or employee thereof).

The term "Facility" means the manufacturing and storage buildings, outdoor tank farms and storage areas, and other buildings (including all physical structures) operated by Shield at 50 Oxford Avenue, Dudley, Massachusetts 01571.

The term "document" means any object that contains, records, stores or presents information, whether in paper, electronic or any other form. The term "document" includes the original or an identical and readable copy thereof, and all non-identical copies (whether different from the original by reason of notation made on such copies or otherwise).

The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (*e.g.*, corporation, limited liability company, partnership, etc.), organization, if any, and a brief description of its business.

The term "identify" means, with respect to a document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.

The term "raw material(s)" means all chemicals or other materials, regardless of whether they are provided by a Shield customer or purchased by Shield, that are used or have been used by Shield to formulate, mix, and/or package products for its customers.

The term "finished product(s)" means final product(s) that are the result of Shield formulating, mixing, filling aerosol cans or other containers with product and/or propellant, labeling, and/or packaging materials for current or former Shield customers.

The term "RMP" means a Risk Management Plan required by Section 112(r)(7) of the Clean Air Act, 42 U.S.C. § 7412(r)(7), and the regulations found at 40 C.F.R. Part 68.

The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the Clean Air Act, the Resource Conservation and Recovery Act, or their implementing regulations, in which case the statutory or regulatory definitions shall apply.

A requested document, item or information shall be deemed to be in your possession, custody or control if you know where it is and can obtain access to it, even if it is not presently in your possession.

Questions

For the period from January 1, 2007, to the present, provide a separate numbered response to each numbered paragraph or subparagraph below. **To the extent that you believe that you have answered a question in another section, please refer to the section and answer you have provided.**

Company and Facility

1. Provide the following information about Shield:

    a. Describe the ownership and business structure;

    b. Indicate the date and state of incorporation;

    c. Identify any corporate officers;

    d. Identify any parent and subsidiary corporations and divisions;

    e. Provide the net worth of the company;

    f. Identify who is responsible for environmental compliance at the Facility; and

    g. Identify Shield facilities nationwide, the activities performed at each facility, the NAICS code(s) for primary and all other processes performed at each facility, and provide the physical and mailing addresses for each facility.

Chemicals at the Facility

2. Provide an inventory of each substance listed under 40 C.F.R. § 68.130 or 40 C.F.R. Part 355 Appendix A, either by itself or as part of a mixture[1], each flammable chemical or mixture with a National Fire Prevention Association flammability hazard rating of 3 or 4, and each pesticide that is currently present at the Facility (including but not limited to raw materials, finished products, off-specification products, and materials labeled or identified by Shield personnel as "quarantine" or "obsolete" materials). For each such substance, including the following information:

    a. Name of the material (trade name and chemical name or CAS number);

    b. Quantity;

    c. Location (by building and floor, or by tank farm location and tank number, where applicable);

    d. MSDS sheet; and

    e. Indicate if the substance has been identified by Shield as "Quarantine" or "Obsolete," or is an off-specification product.

3. Describe the inventory system that Shield has in place to keep track of the presence of all hazardous substances at the Facility, including but not limited to raw materials, finished products,

[1] In concentrations of at least 1% by weight or more.

off-specification products, non-conforming materials, retain samples, and materials labeled or identified by Shield personnel as "quarantine" or "obsolete" materials. In particular, describe how Shield keeps track of its chemical inventory and where such chemicals are stored on a daily basis.

4. Provide a history of the contents of the propellant blend(s) contained in Tank 22 (identified in Shield's RMP as containing "various propellants") from January 1, 2007 to the present, specifying which chemicals or mixtures were stored in Tank 22 at which times.

5. For each of the following chemicals,

    a. butane/propane blend;

    b. isobutane;

    c. propane;

    d. dimethyl ether;

    e. 1,1-difluoroethane; and

    f. propellant blend(s) in Tank 22.

    provide the following information and provide any available documentation that supports your response (*e.g.*, inventory records, invoices, etc.):

    i. Calculate the maximum and typical amounts of all mixtures containing the substance present in aerosol cans at the Facility in each calendar year from January 1, 2007 to the present. Provide a description of how you made that calculation and/or determination and provide backup documentation of how the calculation was performed. Indicate if you can demonstrate, with documentation, that the mixture itself does not have a National Fire Prevention Association flammability hazard rating of 4, in accordance with 40 C.F.R. § 68.115(b)(2)(i);

    ii. Provide the maximum and typical amounts of each substance present at the Facility as (a) aggregated over the entire Facility and as (b) contained in each "process" as that term is defined in 40 C.F.R. § 68.3 in each calendar year from January 1, 2007 to the present (note that EPA generally considers that chemicals stored in the same warehouse or rooms are stored in one "process");

    iii. For each amount listed in response to Question 5(ii), provide an explanation of how you determined the maximum and typical storage quantities with supporting documentation; and

    iv. For each amount listed in response to Question 5(ii), describe the types and sizes of containers used to store each individual substance at the Facility, including the number of each type of container, and where each substance is stored.

<u>Hazard Analyses</u>

6. Provide all hazard analyses for the Facility, including but not limited to Hazard and Operability ("HAZOP") studies, insurance company audits and any other hazard analysis pertaining to the

production, processing, handling, or storage of all chemicals at the Facility. Identify outside parties who participated in conducting any such analyses. Describe whether the hazard analyses identified potential release scenarios and their potential impacts on the public and the environment.

Operating Procedures

7. Provide any updates to the Operating Procedures attached as Appendix H to Shield's January 2008 Risk Management Program and Safety Management Program, and documentation of Shield's process for updating these procedures.

8. Describe how employees are able to identify the valves referenced by letter (*e.g.*, "valve A") in the Operating Procedures attached as Appendix H to Shield's January 2008 Risk Management Program and Safety Management Program, and explain whether the same letters apply to all tanks for the chemicals listed in Question 5.

Mechanical Integrity

9. Describe the inspection and testing procedures followed to maintain the ongoing integrity of tanks and associated equipment utilized in covered processes under the Facility's RMP plan, and the frequency with which those inspections or tests are conducted.

10. Provide documentation of all inspections and tests conducted to maintain the ongoing integrity of tanks and associated equipment utilized in covered processes under the Facility's RMP plan from January 1, 2007 to the present. This documentation should include the date of the inspection or test, the name of the person who performed the inspection or test, the serial number or other identifier of the equipment on which the inspection or test was performed, a description of the inspection or test performed, and the results of that inspection or test.

11. Describe any actions taken to correct deficiencies noted, if any, during inspections or testing of tanks and associated equipment utilized in covered processes under the Facility's RMP plan, including a brief description of the action, the date the action was taken, and the serial number or other identifier of the equipment affected.

Training

12. Provide copies of the following documents associated with training employees involved in operating a covered process under the Facility's RMP plan or in maintaining tanks and equipment utilized in such a process from 2007 to the present. If any of the requested information regarding training does not exist, please so state:

    a. A list of all employees at Shield involved with operating a process covered under the Facility's RMP plan or in maintaining equipment utilized in such a process. For each such employee, list their full name, title, average hours worked per week, and the name and date of all training programs completed by that employee, including whether the training was conducted by the Health and Safety Officer, by a responsible official, or by a private consultant. Include a summary description of each trainer's qualifications;

    b. The job title and written description for each position at the Facility involved in operating a covered process under the Facility's RMP plan or in maintaining equipment utilized in

such a process, the name of each employee that has held those positions, and the dates during which each employee held those positions from January 1, 2007 through the present;

c. A written description of the type and amount of both introductory and continuing training provided to each person filling a position with duties involving operating a covered process under the Facility's RMP plan or maintaining equipment utilized in such a process; and

d. Records documenting the completion of training by employees involved in operating a covered process under the Facility's RMP plan or in maintaining equipment utilized in such a process, including but not limited to copies of any training materials, records of attendance, dates of attendance, and training certificates.

Compliance Audits

13. Provide copies of all reports documenting compliance audits evaluating Shield's compliance with the RMP regulations found at 40 C.F.R. Part 68 from January 1, 2007 to the present.

Design Codes

14. Describe any specific building, equipment, and operation design codes employed by the Facility to prevent and/or mitigate chemical releases in compliance with recognized and generally accepted good engineering practices, including but not limited to codes and standards issued by the American National Standards Institute ("ANSI"), the American Petroleum Institute ("API"), the National Fire Protection Association ("NFPA"), and the Occupational Health and Safety Administration ("OSHA"). Provide records of compliance with these codes and standards, if available.

Building Construction

15. Describe when Shield first started using flammable materials in each process at the Facility, including but not limited to piping flammable materials into the Main Plant from outdoor storage tanks and storing flammable materials in the Main Plant, the Warehouse building, and/or Building No. 3.

16. Provide copies of all reports, backup documentation, and any other documents relating to any studies of the structural integrity of the Main Plant and/or Warehouse building(s), including but not limited to the weight-bearing capacity of the upper floors of the building(s).

Potential Air Emissions

17. Provide a calculation of potential to emit ("PTE") of volatile organic compounds ("VOCs") and hazardous air pollutants ("HAPs"), taking into consideration the mix of products produced by the Facility over the past five years, and using the methodology referenced in the August 29, 1996 memorandum from John S. Seitz, Director of Office of Air Quality Planning and Standards, entitled "Clarification of Methodology for Calculating Potential to Emit For Batch Chemical Production Operations" (found at http://www.epa.gov/region07/air/title5/t5memos/socma820.pdf). For HAPs, list each compound and calculated PTE separately. Also include the calculations for each PTE.

Hazardous Waste

18. Provide copies of the following documents associated with RCRA Hazardous Waste Management Training Program at Shield from 2008 to the present. If any of the requested information regarding training does not exist, please so state:

    a. A list of all employees at Shield with hazardous waste management duties, including but not limited to employees who handle hazardous waste from production lines, mixing areas, laboratory/testing areas, hazardous waste storage areas, Building No. 3, and/or the Retain Room. For each such employee, list their full name and assigned work area(s);

    b. The job title and written job description for each position at the Facility related to hazardous waste management. Provide the name of each employee with those hazardous waste management duties and the dates during which each employee held those responsibilities from January 1, 2008 through the present;

    c. For all employees listed in response to Question 18(a) above, provide a written description of the type and amount of both introductory and continuing RCRA hazardous waste management training completed by each person; and

    d. Employee records documenting the completion of hazardous waste management training, including but not limited to copies of any training materials, records of attendance, dates of attendance, and training certificates.

19. Describe the actions you have taken to inventory and dispose of waste on site since EPA's April 2011 Inspection. Also, provide copies of all waste profiles, manifests of disposal, and land disposal restriction notices from April 1, 2011 to the present.

Materials Observed at the Facility During EPA Inspections

20. During EPA's April 2011 Inspection, EPA inspectors observed numerous retain samples outside of the Retain Room. If any of those samples have been disposed of as waste, provide copies of any supporting documentation (*e.g.*, bills of lading, hazardous waste determinations, land disposal restriction notifications, or any other process knowledge used to characterize those wastes).

21. For the materials listed in subparts (i) – (xxviii) below, provide the following information and supporting documentation for each material. For each romanette numeral below, *i.e.*, (i) – (xxviii), provide your responses to question subparts (a) – (d) below clipped or otherwise packaged together by item and/or romanette:

    a. Name of the material (trade name and chemical name or CAS number);

    b. Inventory tracking number (*i.e.*, SPN, SR and/or NCMR number(s));

    c. Indicate if the material is a waste and if so, provide any supporting documentation including but not limited to hazardous waste determinations (*i.e.*, analytical data, MSDS sheets, or other process knowledge information), waste profiles, manifests of disposal, land disposal restriction notifications, or bills of lading; and

d. If the material is not a waste, describe for what purpose Shield intends to or has already used it, and provide copies of any supporting documentation to prove that the material is not a waste (*e.g.*, invoices, purchase orders, shipping records, financial records, accounting records documenting that product has been written off by Shield as a loss, etc.);

   i. If the material is a finished product or a raw material used by Shield to mix and package a finished product, identify the following, in addition to providing the documentation requested above:

      1. the customer(s) and finished product(s) for which it is used; and

      2. the date on which Shield last produced and/or packaged that product for that customer; or

   ii. If the material is otherwise used at the Facility (*e.g.*, maintenance, commercial chemical product substitutes), identify how, where, and how often it is used, in addition to providing the documentation requested above.

Provide the information requested above for the following materials observed at the Facility:

i. One (1) 55-gallon drum labeled "Conquest, 10/23/08, Part No. 095002" and marked with a large "X" within a square on the drum lid, observed in the flammable storage room during EPA's April 2011 Inspection;

ii. Containers of "Dowanol" pesticides and a 55-gallon drum of aqueous ammonia observed near each other on the second floor of the plant, stored along the right side of the aisle space opposite of the Retain Room during EPA's April 2011 Inspection;

iii. The following materials observed in the "Old Warehouse Section" of Building No. 3 during EPA's inspection: One (1) damaged fiber drum labeled "RESU Z8-2930" and "05063 #3"; and one (1) drum labeled "Dowicide-1 Antimicrobial";

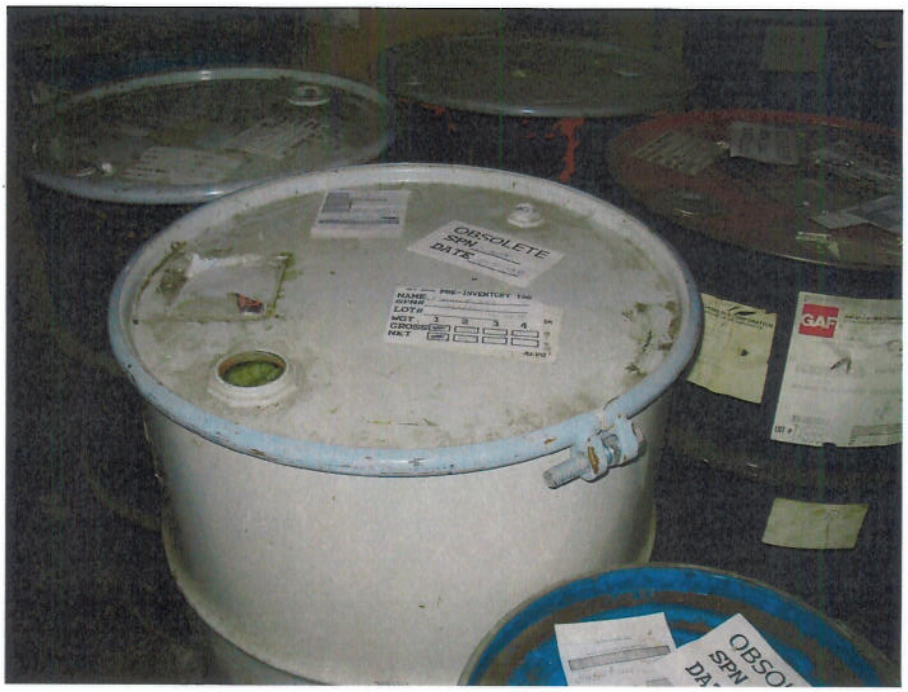
iv. All materials labeled "CABOT" or otherwise identified by Shield personnel as raw materials or finished product relating to contracts with former customer Cabot (regardless of current owner of materials);

v. All materials labeled "Butcher Products," Sumner Laboratories," and/or "Manart-Hirsch" located at the Facility at the time of the inspection (including but not limited to: Butcher's Glass Cleaner, Butcher's Night and Day Oven Cleaner, Level 1 aerosol Butcher's Jackhammer, Butcher's Speedball 2000, Butcher Spray Cleaning Polish, Manart-Hirsch 210 Plastic Cleaner and Polish, Sumner Laboratories 210 Plastic Cleaner and Polish, PL #23 Lancer and/or Butcher Lancer, and Butcher's PL#4 Sundance Neutral Cleaner);

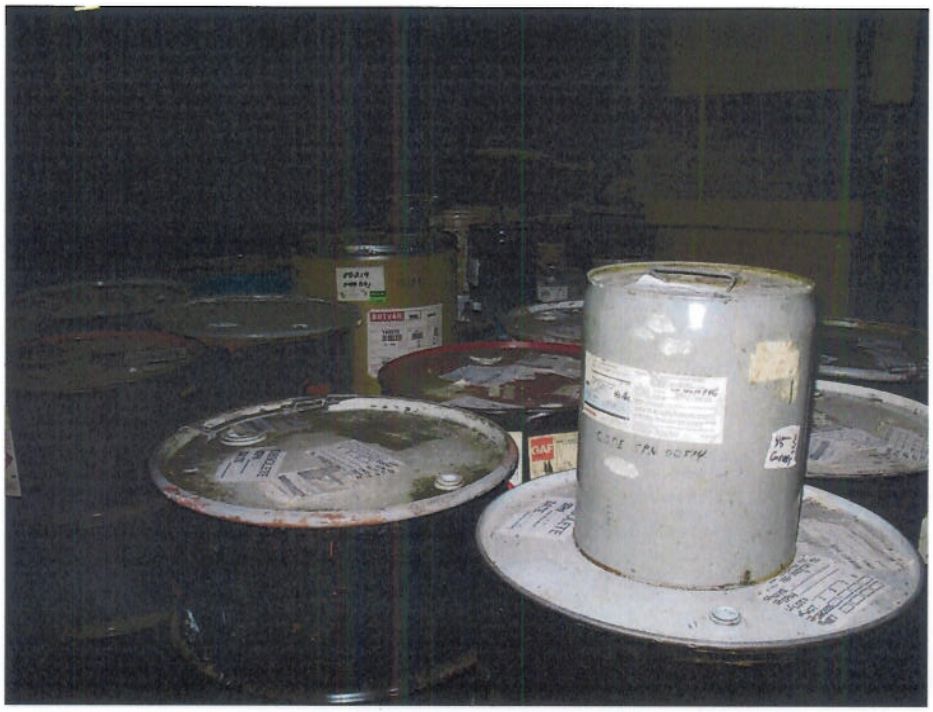
vi. All aerosol cans of WD-40 and WD40 Co. 3-in-1 Lubricant located in Building No. 3 at the time of the inspection;

vii. All materials marked "OBSOLETE" in the following image (EPA Image 9) taken on the second floor of the main plant building during EPA's April 2011 Inspection, to the left of the main/center aisle (includes materials marked with SPN numbers 08138 and 00405)

viii. All materials marked "OBSOLETE" in the following image (EPA Image 16) taken on the second floor of the main plant building during EPA's April 2011 Inspection (includes materials labeled "11-5-08, Tixogel ® OMS, lot 10/24/08, SPN 01920"; "11-5-08, Uvinul ® 3035, SPN 02000"; "11-5-08, PVP/VA I335 Copolymer, SPN 01620"; and "11-5-08, Viberseal, lot 10/22/08")



ix. All materials marked "OBSOLETE" in the following image (EPA Image 20) taken on the second floor of the main plant building during EPA's April 2011 Inspection, (includes materials labeled "Ektapro EEP solvent, SPN 00514" and "11-5-08, 142 Solvent 66/3, SPN 00405")



x. All materials marked "OBSOLETE" in the following image (EPA Image 21) taken on the second floor of the main plant building during EPA's April 2011 Inspection, (includes materials labeled "SPN 00314"; "SPN 00136"; "Dow Corning 244 Fluid"; and "[illegible] chlorobenzene")

xi. All materials in the following image (EPA Image 50) taken on the second floor of the main plant building during EPA's April 2011 Inspection

xii. All materials in the following image (EPA Image 51) taken on the second floor of the main plant building during EPA's April 2011 Inspection includes materials marked "Trizone Penetrating Solvent"; "Zap-A-Spot Carpet and Spot Cleaner"; and "extremely flammable")

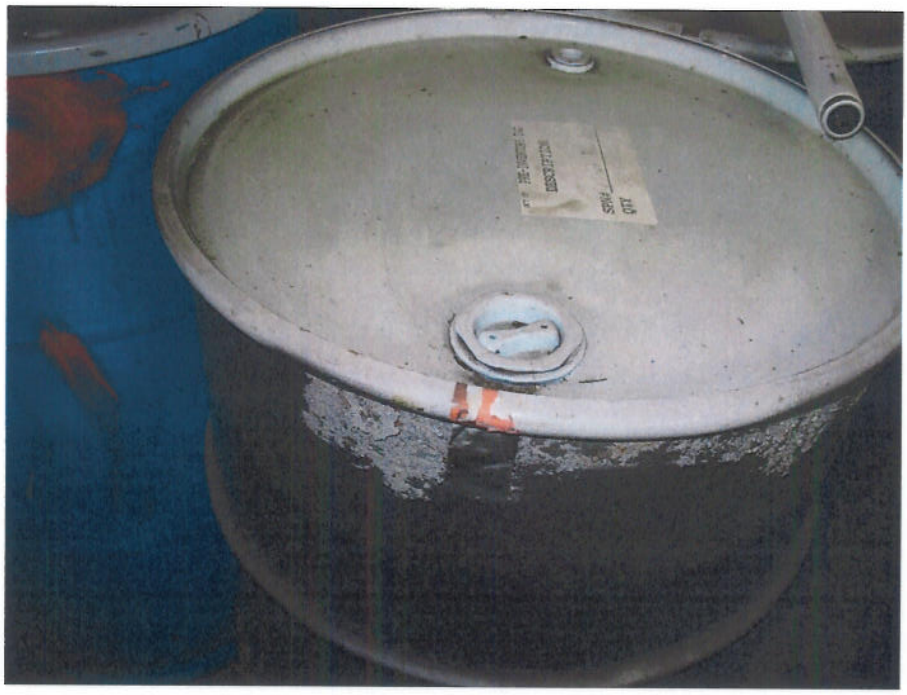
xiii. All materials in the following image (EPA Image 53) taken on the fourth floor of the warehouse during EPA's April 2011 Inspection (includes materials labeled "OBSOLETE"; "G/R"; "Shoo-fly Hornet Jet Bombs"; "Cabot SPF Cleaner and Conditioner Deck and Fence Pre-treatment"; and "TACC Adhesives")

xiv. All materials in the following image (EPA Image 59) taken on the fourth floor of the warehouse during EPA's April 2011 Inspection (includes materials labeled "OBSOLETE"; and "Cabot SPF Deck and Fence Pre-treatment")

xv. All materials in the following image (EPA Image 60) taken on the fourth floor of the warehouse during EPA's April 2011 Inspection

xvi. All materials in the following image (EPA Image 63) taken on the fourth floor of the warehouse during EPA's April 2011 Inspection (includes materials labeled "OBSOLETE" and "IGI Klipper Wiz")

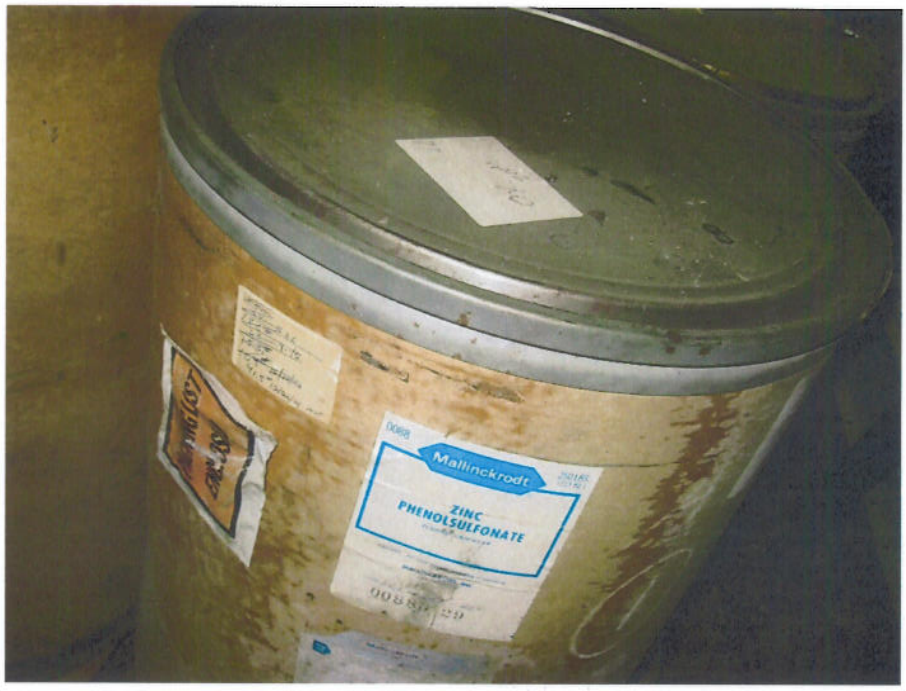
xvii. Materials in the following image (EPA Image 77) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection (includes materials labeled "Viber Seal Red, 50 gallons")



xviii. All materials in the following image (EPA Image 82) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection (includes materials labeled "TSPP 2004 for cleaner, tetrasodium pyrophosphate;" "Inventory Tag 790"; and "Inventory Tag 791 Hercules 7L-T3"

xix. Materials in the following image (EPA Image 83) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection (includes materials labeled "Ammo 4, 400 lbs, Ammonyx from Onyx Chem. Co.")

xx. Materials in the following image (EPA Image 84) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection (includes materials labeled "Mallinckrodt, zinc phenolsulfonate, 250 lbs., 41.5# 12/20/1976 net")



xxi. All materials in the following image (EPA Image 91) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection (includes materials labeled Viberseal; TAL 5 concentrate; and tetrasodium pyrophosphate)

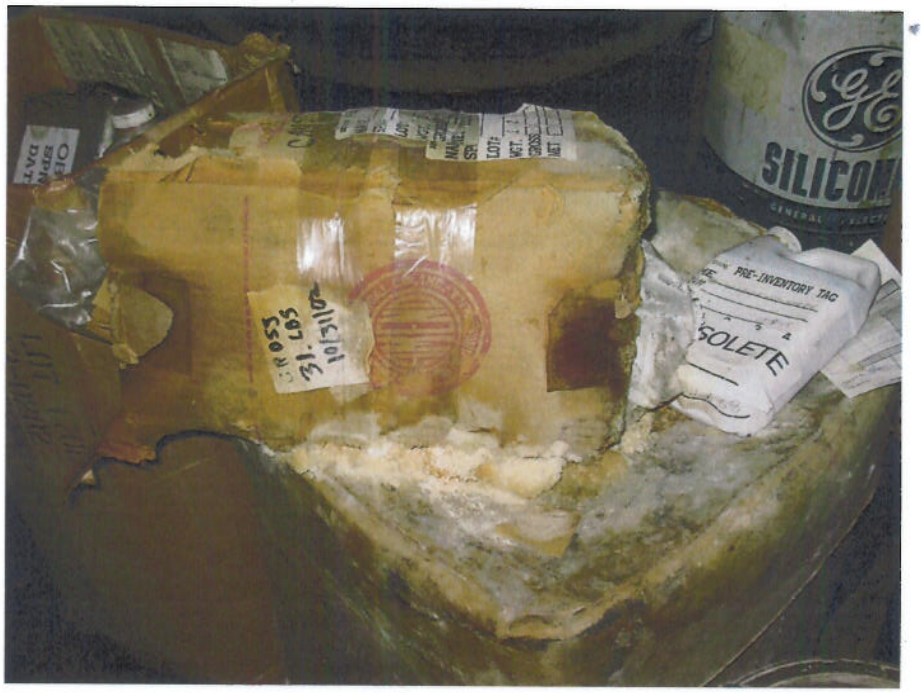
xxii. All materials in the following image (EPA Image 111) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection (includes unlabeled materials wrapped in plastic with the words "For Bruce" written on it)

xxiii. All materials in the following image (EPA Image 115) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection

xxiv. All materials in the following image (EPA Image 116) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection (includes materials labeled "non-regulated"; "flammable liquid"; "contains toluol"; "silicone fluid"; "3D, Formulation X205681D, (134a propellant)"; "Oil Trement"; and "hydraulic")

xxv. All materials in the following image (EPA Image 121) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection (includes materials labeled "Loctite Corporation Development Product, Product No. 7380 Activator 3E604"; "Swix, I 75 Ski Wax Remover"; "Special 610 Lube"; "SR 906.0"; and "Cubitainer This Side Up")

xxvi. All materials in the following image (EPA Image 129) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection

xxvii. All materials in the following image (EPA Image 130) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection (includes materials labeled "Key Tech, Developmental Product, Lock-n-Pop, X3237"; "Gross's, 01824, 97-506, accepted 10/21/07")

xxviii. All materials in the following image (EPA Image 135) taken on the first floor of "Building No. 3" during EPA's April 2011 Inspection (includes materials in unlabeled cardboard boxes; cardboard boxes labeled "obsolete, caustic waste, 26 lbs, lot 4/28/08, CR053, 31 lbs, 10/31/02" and "[illegible] amine, 1G 22, G-2328, Lot-2-4711, 26#, 12-5, JC"; and material in a plastic 1-gallon bucket labeled "obsolete, wood stripper with green dye, 10-9-08")