



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I - NEW ENGLAND  
5 POST OFFICE SQUARE, SUITE 100  
BOSTON, MA 02109-3912

**URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY**  
**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

July 14, 2011

Thomas & Betts Corporation  
c/o Mr. Michael J. Geiger, Esq.  
Asst. General Counsel  
8155 T&B Boulevard  
Memphis, TN 38125

Re: **Notice of Potential Liability** at Operable Unit Two of the Peterson/Puritan, Inc. Superfund Site which includes the J.M. Mills Landfill in Cumberland and Lincoln, Rhode Island.

Dear Mr. Geiger:

This letter serves to formally notify Thomas & Betts Corporation of the potential liability it has or may have incurred with respect to Operable Unit Two of the Peterson/Puritan, Inc. Superfund Site which includes the J.M. Mills Landfill, in Cumberland and Lincoln, Rhode Island (the "Site"). In addition, this letter requests that you pay certain costs related to the Site and that you prepare to participate in the conduct or financing of certain clean-up activities at the Site.

**NOTICE OF POTENTIAL LIABILITY**

The United States Environmental Protection Agency ("EPA") has documented the release or threatened release of hazardous substances, pollutants or contaminants at the Site.

Under Sections 106(a) and 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9606(a) and 9607(a) ("CERCLA"), and other laws, responsible parties may be obligated to undertake actions deemed necessary by EPA to protect the public health, welfare, or environment. Responsible parties may also be liable for all costs incurred by the government in responding to any release or threatened release at the Site. Such costs may include, but are not limited to, expenditures for investigation, planning, clean-up response and enforcement activities. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the costs to assess such damages.

Responsible parties under CERCLA include persons who are current or former owners and/or operators of a site, persons who arranged for disposal of hazardous substances at a site, or

persons who accepted hazardous substances for transport to a site selected by such persons.

EPA has evaluated a large body of evidence in connection with its investigation of the Site, including Site business records, manifests, state records, and corporate records. Based on this evidence, EPA has information indicating that you are a potentially responsible party ("PRP") with respect to this Site. Specifically, EPA has reason to believe that you are the successor to Augat, Inc., an entity that arranged by contract, agreement or otherwise for disposal or treatment, or arranged with a transporter for transport for disposal or treatment of hazardous substances found at the Site.

By this letter, EPA notifies you of your potential liability with regard to this matter. EPA also encourages you, as a PRP, to reimburse EPA for the costs incurred to date as set out below. Currently, KIK Custom Products, Inc. ("KIK") and Waste Management are under an obligation to perform the Remedial Investigation and Feasibility Study ("RI/FS") and Unilever and Waste Management are under an obligation to finance the RI/FS at the Site through an October 18, 2004 Third Amendment to the Administrative Order on Consent. EPA encourages you to voluntarily enter into discussions with KIK, Unilever, and Waste Management, and to cooperate and participate with these parties in the performance of the RI/FS at the Site. EPA understands that the PRPs are in the process of forming a Steering Committee and suggests that you contact Curt Connors (cconnors@gncm.net), Jonathan Murphy (jamurphy@bpslaw.com) or David Graham (dbgraham@kaufcan.com) to discuss those efforts.

### **DEMAND FOR PAYMENT OF COSTS**

In accordance with CERCLA and other authorities, EPA has undertaken certain actions and incurred costs in response to conditions at the Site. These response actions are described below. The costs to date associated with these actions are approximately \$2,245,630.50 excluding interest. EPA anticipates that it will expend additional funds for response activities at the Site under the authority of CERCLA and other laws, including those response activities described below.

In accordance with Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), a demand is hereby made for payment of the above amount, and all interest authorized to be recovered under that Section or under any other provisions of law. Demand is also hereby made under these authorities for payment of all future costs, and interest thereon, that EPA may accrue in regard to the Site.

In the event the addressee of this notice intends or has already filed for dissolution or reorganization under bankruptcy laws, you are hereby requested to include EPA-Region I, and the United States Department of Justice on any mailing or notice lists used in that proceeding. The United States reserves the right to file a proof of claim or application for reimbursement of administrative expenses in such a proceeding.

Contained in Enclosure B of this letter is a current summary of the costs expended for this Operable Unit of the Site. As you may be aware, PRPs are entitled to review the invoices which form the basis for EPA's past costs. Some of these documents may contain information that EPA's contractors claim is entitled to confidential treatment. The Agency's past practice has

been to obtain the consent of the contractors pursuant to 40 C.F.R. 2.209(f) (confidential business information regulations) before releasing this information to PRPs. These regulations, however, have been revised to allow information on past costs to be released provided that the interested party signs a Confidential Business Information Agreement ("Agreement") not to disclose this information.

This Agreement is necessary to protect the interests of the submitters in the confidentiality of the business information. No party is under any obligation to execute this Agreement. Without executing this Agreement, however, the Agency cannot release documentation on past costs. If you are interested in reviewing these documents, please contact David J. Newton, EPA Regional Project Manager, at (617) 918-1243.

### **RESPONSE ACTIVITIES AT THE SITE**

EPA has conducted the following activities at the Site:

1. A time-critical removal action in response to tanks, still bottoms and drums located at the Site and to restrict access to the Site by the construction of a fence; and
2. A time-critical removal action in response to asbestos disposal and fence repair.

EPA is conducting or plans to conduct the following activities at the Site:

1. Remedial Investigations to identify the local characteristics of the Site and to define the nature and extent of soil, air, surface water and ground water contamination at the Site;
2. Feasibility Studies to evaluate the feasibility of possible remedial actions to remove or contain hazardous substances, pollutants and contaminants at the Site;
3. Design and implementation of a Remedial Action for the Site to be approved by EPA; and
4. Operation, maintenance and monitoring of the Site as deemed necessary by EPA.

In addition to those enumerated above, EPA may, pursuant to its authorities under CERCLA and other laws, decide that other response activities are necessary to protect public health, welfare or the environment.

### **SPECIAL NOTICE AND NEGOTIATION MORATORIUM**

At an appropriate point in the future, you will receive an additional notice informing you that one or more of the above activities is pending and that your cooperation is being requested to negotiate the terms of an agreement to perform or finance these activities. This forthcoming notice will serve to inform you that EPA is using either CERCLA Section 122(e) Special Notice

procedures to formally negotiate the terms of a consent order or consent decree to conduct or finance site response activities at the Site or it will inform you that EPA is not using such procedures pursuant to Section 122(a). If EPA does not use Section 122(e) Special Notice procedures, the Section 122(a) notice will explain why the Special Notice procedures were not appropriate in this case. Under Section 122(e), EPA has the discretionary authority to invoke Special Notice procedures if EPA determines that such procedures would facilitate an agreement between EPA and the PRPs and would expedite remedial action at the Site. Use of the Special Notice procedure triggers a moratorium on certain EPA activities at the Site. The purpose of the moratorium is to provide a period of time when PRPs and EPA may enter into formal negotiations allowing PRPs the opportunity to conduct or finance the response activities at the Site.

### **ENCLOSURE INFORMATION**

- A description of the Site, specifically Operable Unit 2 which includes the J. M. Mills Landfill. (Enclosure A)
- Master Roll-Off Sheet dated September 18, 1972 indicating that Goditt & Boyer picked up drums from Augat, Inc. for disposal at the Site (represents additional evidence of waste disposal at the Site discovered since the January 2011 104(e) Information Request Mailing) (Enclosure B)
- A current Site Cost Summary for OU 2. (Enclosure C)
- A list of the names and addresses of potentially responsible parties to whom this notification was provided. This list represents EPA's preliminary findings on the identities of potentially responsible parties. EPA's responsible party search is continuing. Inclusion on or exclusion from the list does not constitute a final determination by the Agency concerning the liability of any party for the hazard or contamination at the Site. (Enclosure D)
- An Information Sheet for Small Businesses. (Enclosure E)

### **PRP Steering Committee:**

EPA understands that the PRPs are in the process of forming a Steering Committee and suggests that you contact Curt Connors (cconnors@gncm.net), Jonathan Murphy (jamurphy@bpslaw.com) or David Graham (dbgraham@kaufcan.com) to discuss those efforts. This Steering Committee will function as a group representing and pursuing the interests of the PRPs during negotiations with EPA. To facilitate negotiations at an appropriate time in the future, EPA will conduct a meeting with responsible parties. At the meeting, EPA will detail the existing knowledge about conditions at the Site and describe the past response activities that have been taken at the Site to date.

## Administrative Record

In accordance with Section 113(k) of CERCLA, EPA must establish an administrative record containing the documents used by EPA to select the appropriate response action for the Site. An administrative record for Operable Unit 1 of the Site has been previously established. An administrative record for Operable Unit 2 of the Site will also be established. The administrative record will be available to the public for inspection and comment at:

U.S. EPA Records Center  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912  
Telephone No. 617-918-1440

Another copy of the administrative record will also be made available at the Cumberland Public Library at 1464 Diamond Hill Road in Cumberland, Rhode Island.

## TIMING AND FORM OF RESPONSE TO THIS LETTER

You, as a potentially responsible party, should notify EPA in writing within **twenty-one (21) days** from receipt of this letter regarding your willingness to perform or finance the response activities described above. If EPA does not receive a timely response, EPA will assume that your organization does not wish to negotiate a resolution of its liabilities in connection with the Site and that your organization has declined any involvement in performing the response activities.

Your letter should indicate the appropriate name, address, and telephone number for further contact with you. If you are already involved in discussions with state or local authorities, engaged in voluntary clean-up action, or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions.

Your response letter should be sent to:

U.S. EPA Records Center  
c/o Peterson/Puritan, Inc. Superfund Site  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

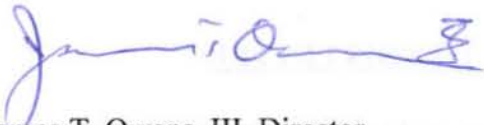
If you have general questions concerning the Site, please contact David J. Newton, Remedial Project Manager, U.S. Environmental Protection Agency, 5 Post Office Square, Suite 100 (OSRR07-1), Boston, MA 02109-3912, (617) 918-1243. If you have any legal questions relevant to the Notice of Liability or if your attorney wishes to communicate with EPA on your behalf, please contact Michelle Lauterback, Senior Enforcement Counsel, U.S. Environmental Protection Agency, 5 Post Office Square, Suite 100 (OES04-3), Boston, MA 02109-3912, (617) 918-1774.

The factual and legal discussions in this letter are intended solely to provide notice and information, and such discussions are not to be construed as a final agency position on any matter set forth herein. Due to the seriousness of the environmental and legal problems posed by conditions at the Site, EPA urges that immediate attention and a prompt response be given to this letter.

By copy of this letter, EPA is notifying the State of Rhode Island and the Federal Natural Resource Trustee(s) of our intent to perform or enter into negotiations for the performance or financing of response actions at the Site.

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "James T. Owens, III".

James T. Owens, III, Director  
Office of Site Remediation and Restoration

Enclosures

*Sent by electronic mail only*

cc. Michelle Lauterback, EPA Superfund Legal Office  
David J. Newton, EPA Remedial Project Manager  
Donna Murray, EPA Enforcement Coordinator  
Paul Kulpa, RIDEM Project Manager  
Michael Rubin, EAU, Office of Rhode Island Attorney General  
Leo Hellested, Office Waste Management, RI Dept. of Environmental Management  
Andy Raddant, Department of the Interior, Federal Natural Resource Trustee  
Ken Finkelstein, NOAA, Federal Natural Resource Trustee

## ENCLOSURE A: SITE DESCRIPTION

The Peterson/Puritan, Inc. Superfund Site (the "Site") consists of two operable units ("OUs") and a potential OU 3 area, totaling over two linear miles of mixed industrial/commercial/residential property. The Site is located along the Blackstone River and includes a portion of the Blackstone River Valley National Heritage Corridor. The Site is located in the towns of Cumberland and Lincoln, in the north-central corner of Rhode Island.

The OU 2 portion of the Site, which contains the J.M. Mills Landfill, is surrounded by industrial, residential and semi-rural properties. Bordering OU 2 to the north is the Hope Global Company, located at 88 Martin Street, Cumberland. Hope Global is part of the OU 1 area of the Site. To the south of OU 2 is the Stop and Shop Market (and strip mall) on Mendon Road, Cumberland (Route 122). The eastern boundary of OU 2 includes a portion of the Mackland Sand and Gravel operations and wetlands formerly known locally as the New River. Finally, the western boundary of OU 2 is the Blackstone River.

OU 2 contains many different parcels. EPA believes that the most contaminated parcel is the privately owned 52 acre J. M. Mills Landfill which accepted mixed municipal and industrial waste from 1954 through 1986. Adjacent to the J.M. Mills Landfill is a privately owned 34 acre unnamed island located in the Blackstone River. EPA recently discovered solid wastes disposed on this island and believes that the island's soils were used to provide daily cover materials for the landfill and, perhaps, was even used as an additional disposal location during the time in which the landfill was operating. Down river from the unnamed island is the Pratt Dam, which provides an access point to the island. The Site also includes the 26 acre Lincoln Quinville Wellfield and the Cumberland Lenox Street municipal well. These wells were used by the towns of Lincoln and Cumberland as a municipal water supply until 1979 when they were closed by the Rhode Island Department of Health due to the presence of volatile organic contaminants found in the water. A section of the Providence and Worcester Railroad line runs through OU 2 and forms the eastern extent of the landfill slope while the river forms the landfill's western boundary. A former privately owned transfer station arranged for waste to be disposed of at the J.M. Mills Landfill. This transfer station was located on the southern portion of the Site. Other areas of OU 2 include portions of the Blackstone River and an adjacent canal, the Blackstone River Bikeway and a privately owned sand and gravel operation.

Preliminary samples taken from OU 2 indicate the presence of volatile organic contaminants (including, but not limited to, trichloroethylene, freon 11, 1,2-dichloroethene, 1,1,1-trichloroethane, benzene) and also chromium, nickel and lead in the groundwater. Contaminants found in the soil and sediment include benzo(a)pyrene, chrysene, indeno(1,2,3+cd)pyrene, bis(2-ethylhexyl)phthalate, aroclors and asbestos insulation/transite. In addition, preliminary sampling of the soils along the river has found contamination with polychlorinated biphenyls, polyaromatic hydrocarbons and heavy metals.

EPA included the Site on the Superfund National Priorities List on September 8, 1983. EPA conducted a removal action on the OU 2 area in 1992 to construct a fence around the former J.M. Mills Landfill and to remove drums containing contaminated materials from the base of the landfill. In November 1997, a second removal action was conducted at the J.M. Mills Landfill to address recently disposed asbestos-containing wastes found outside of the fenced-in area. The security fence was extended to limit further dumping and restrict access to the OU 2 portion of the Site.

An investigation into the nature and extent of contamination at the J.M. Mills Landfill and surrounding areas is currently underway. Following the completion of this study, a final cleanup remedy will be selected, a remedial design will be completed and the remedial action will be initiated.

001004

MASTER ROLL-OFF ROUTE SHEET

Date MON. Sept 18, 1971

(47)

| TIME CALLED IN | TIME GIVEN OUT | DRIVER OR HAULER | CUSTOMER                                | STORE NO. | CONT. SIZE | DUMPED         |
|----------------|----------------|------------------|---|-----------|------------|----------------|
| 1              |                | S                | SISALKRAFT                              | X         | 30         | 1-2004         |
| 2              |                |                  |   | X         | 40         | 3-Corona       |
| 3              |                | RS               | APEX DUST                               | X         | 90         | Cumb. ✓        |
| 4              |                | TC               | APEX PACKER                             | X         | 42         | Cumb. ✓        |
| 5              |                | TC               | PURITAN                                 | X         | 42         | Cumb. ✓        |
| 6              |                | gc               | HARODITE                                | X         | 42         | Taunton        |
| 7              |                | L.S.             | SEARS QUINCY                            | X         | 40         | Sugamon        |
| 8              |                | JW               | CERRETANI'S REVERE                      | X         | 40         | Stein          |
| 9              |                | JW               | CERRETANI'S MELROSE                     | X         | 40         | Stein          |
| 10             |                | JW               | CERRETANI'S READING                     | X         | 40         | Stein          |
| 11             |                | L.S.             | Shannout                                | X         | 42         | Thaughton      |
| 12             |                | RS               | Paint Man. H.S.P.                       | X         | 37         | Cumb. ✓        |
| 13             |                | JW               | First National                          | X         | 40         | Stein          |
| 14             |                | B                | Albid Cart.                             | X         | 40         | Eddy           |
| 15             |                | K                | S. S. Dartmouth #28                     | X         | 40         | United         |
| 16             |                | RS               | Crescent Blocks                         | X         | 30         | Cumb. ✓        |
| 17             |                | JW               | Child World Laugus                      | X         | 40         | Stein          |
| 18             |                | RS               | Standard Pump Corant 1-4                | X         | 40         | Cumb. ✓        |
| 19             |                | JCh.             | Whitman Prod. W.W.                      | X         | 40         | W.W.W.         |
| 20             |                | JCh.             | Berkman Packer                          | X         | 40         | Copmans ✓      |
| 21             |                | JCh.             | Ann Hesper (C)                          | X         | 40         | United         |
| 22             |                | S                | Wells                                   | X         | 40         | Chello         |
| 23             |                | K                | Bradley Westgate #886                   | X         | 40         | Cal's          |
| 24             |                | gc               | S. S. Fall River #61                    | X         | 40         | United         |
| 25             |                | S                | August Drums #4 Drums                   | X         | 15         | DRUMS Cumb. ✓  |
| 26             | x              | TC               | J.H. Anderson + back                    | X         | 30         | Copmans ✓      |
| 27             |                | RS               | Apex Inc. Paint                         | X         | 40         | Cumb. ✓        |
| 28             |                |                  | Big G. Westoby                          |           |            | ✓              |
| 29             |                | JCh.             | Nyman Mfg                               | X         | 40         | Cumb. ✓        |
| 30             | *              | S                | 27 Elm St. Foxboro                      | X         | 30         | Foxboro        |
| 31             |                | JW               | Ann Hesper Drums (C)                    | X         | 40         | Stein          |
| 32             |                | JCh.             | S. S. Worcester #55                     | X         | 40         | United         |
| 33             |                | L.S.             | Spaly                                   | X         | 40         | Randall        |
| 34             |                | B                | S. S. Westgate #480                     | X         | 40         | United         |
| 35             |                | TC               | Beacon Paps + 1-out                     | X         | 30         | T-A (1-out) ✓✓ |
| 36             |                | JCh.             | Apex Hesper W.W. (C)                    | X         | 40         | Copmans ✓      |
| 37             |                | JCh.             | S. S. Abington Ave #710                 | X         | 40         | United         |
| 38             |                | TC               | Eastern Refractories 1-30 Bell Meadows  |           |            | Dance          |
| 39             |                | JCh.             | Big S. Old Hill                         | X         | 40         | United         |
| 40             |                | JCh.             | Whymon Andon                            | X         | 40         | Eddy           |
| 41             |                |                  | S. S. Falmouth #816 (Tues am)           |           |            | ✓              |
| 42             |                |                  | S. S. Somerset #966 (Tues am)           |           |            | ✓              |
| 43             |                | S                | Mansfield Opt.                          | X         | 30         | Mansfield      |
| 44             |                |                  | North W. Corbury (Tues)                 |           |            | ✓              |
| 45             |                | B                | S. S. Melford #82                       | X         | 40         | United         |
| 46             |                | JW               | Standard Asso                           | X         | 40         | Eddy           |
| 47             |                | RS               | Union Wadding                           | X         | 40         | Cumb. ✓        |
| 48             | X              | X                | Knigs Bunker (Tues)                     |           |            | ✓              |
| 49             |                | L.S.             | Del. 1-50 to A.P. Chatham 3-4           |           |            | Dance          |
| 50             |                | RS               | Del. 1-30 2 Pennine for high St. school |           |            | Dance          |
| 51             |                | K                | Bradley F.R. #871                       |           |            | ✓              |
| 52             |                |                  | Mans Medway                             |           |            | ✓              |
| 53             |                |                  | Mans Attdo                              |           |            | ✓              |
| 54             |                |                  | Spanthony                               |           |            | ✓              |
| 55             |                |                  | Angelic Falmouth                        |           |            | ✓              |
| 56             |                |                  | Bradley Yarmouth #817                   |           |            | ✓              |
| 57             |                |                  | Bradley Big G. South                    |           |            | ✓              |
| 58             |                |                  | Berkman West a Family (Tues)            |           |            | ✓              |
| 59             |                | JW               | Ann Hesper Drums (C)                    | X         | 40         | Dance          |
| 60             |                | TC               | Finn's Wares. Skids                     | X         | 30         | Cumb. ✓        |



001005

MASTER ROLL-OFF ROUTE SHEET

Date *Mon. Sept. 18, 1972*

| TIME CALLED IN | TIME GIVEN OUT | DRIVER OR HAULER | CUSTOMER                      | STORE NO. | CONT. SIZE | DUMPED |
|----------------|----------------|------------------|-------------------------------|-----------|------------|--------|
| 1              |                |                  | <i>Thompson Chem.</i>         | ✓         |            |        |
| 2              |                |                  | <i>Bob Burt # 712</i>         | ✓         |            |        |
| 3              |                |                  | <i>Am. Home Club.</i>         | ✓         |            |        |
| 4              |                |                  | <i>Bearon Prop. P.A.</i>      | ✓         |            |        |
| 5              |                |                  | <i>Hgt. Street School</i>     | ✓         |            |        |
| 6              |                |                  | <i>Reebaby F.R. Canal St.</i> | ✓         |            |        |
| 7              | <i>jw</i>      | <i>x</i>         | <i>Dutchess Footwear</i>      | ✓         |            |        |
| 8              |                |                  |                               |           |            |        |
| 9              |                |                  |                               |           |            |        |
| 10             |                |                  |                               |           |            |        |
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| 58             |                |                  |                               |           |            |        |
| 59             |                |                  |                               |           |            |        |
| 60             |                |                  |                               |           |            |        |

IFMS Reconciliation Pending

Itemized Cost Summary

PETERSON/PURITAN, CUMBERLAND, RI SITE ID = 01 40

Operable Unit(s): 00, 02, 03, Blank

Unrecovered OU2 costs through September 30, 2010

|  |                     |
|--|---------------------|
| <b>REGIONAL PAYROLL COSTS .....</b>                                  | <b>\$617,045.28</b> |
| <b>HEADQUARTERS PAYROLL COSTS .....</b>                              | <b>\$7,473.40</b>   |
| <b>REGIONAL TRAVEL COSTS .....</b>                                   | <b>\$1,467.76</b>   |
| <b>HEADQUARTERS TRAVEL COSTS .....</b>                               | <b>\$1,047.59</b>   |
| <b>ALLOCATION TRANSFER IAG COSTS</b>                                 |                     |
| DEPARTMENT OF HEALTH & HUMAN SERVICES (ATSDR) .....                  | \$5,821.93          |
| DEPARTMENT OF COMMERCE (NOAA) .....                                  | \$18,573.59         |
| <b>EMERGENCY REMOVAL CLEANUP SERVICES (ERCS) CONTRACT COSTS</b>      |                     |
| OHM REMEDIATION SERVICES CORPORATION (68-01-7445) .....              | \$44,565.95         |
| OHM REMEDIATION SERVICES CORPORATION (68-W3-0012) .....              | \$21,897.18         |
| <b>ENFORCEMENT SUPPORT SERVICES (ESS) CONTRACT COSTS</b>             |                     |
| MABBETT & ASSOCIATES, INC. (EPW07051) .....                          | \$72,272.69         |
| <b>ENVIRONMENTAL SERVICES ASSISTANCE TEAMS (ESAT) CONTRACT COSTS</b> |                     |
| ROY F. WESTON, INC. (68-01-7443) .....                               | \$3,617.21          |
| <b>INTERAGENCY AGREEMENT (IAG) COSTS</b>                             |                     |
| DEPARTMENT OF THE INTERIOR - FWS (DW14424801) .....                  | \$2,267.67          |
| <b>OTHER CONTRACT COSTS</b>  |                     |
| TECHLAW, INC. (0Z0109NBLX) .....                                     | \$980,205.81        |
| LABAT ANDERSON INC. (68-W9-0052) .....                               | \$3,543.63          |
| TECHLAW, INC. (EP051000077) .....                                    | \$164,998.49        |
| <b>REMEDIAL (REM) CONTRACT COSTS</b>                                 |                     |
| CDM FEDERAL PROGRAMS CORPORATION (68-01-6939) .....                  | \$2.33              |

## IFMS Reconciliation Pending

## Itemized Cost Summary

PETERSON/PURITAN, CUMBERLAND, RI SITE ID = 01 40

Operable Unit(s): 00, 02, 03, Blank

Unrecovered OU2 costs through September 30, 2010

**SUPERFUND TECHNICAL ASSISTANCE AND RESPONSE TEAM (START)****CONTRACT COSTS**

|  |          |
|--|----------|
| ROY F. WESTON, INC. (68-W5-0009) ..... | \$507.68 |
|--|----------|

**TECHNICAL ASSISTANCE TEAM (TAT) CONTRACT COSTS**

|  |             |
|--|-------------|
| ROY F. WESTON, INC. (68-01-7367) ..... | \$10,882.71 |
|--|-------------|

|  |             |
|--|-------------|
| ROY F. WESTON, INC. (68-W0-0036) ..... | \$23,316.71 |
|--|-------------|

**TECHNICAL ENFORCEMENT SUPPORT (TES) CONTRACT COSTS**

|   |          |
|---|----------|
| CDM FEDERAL PROGRAMS CORPORATION (68-01-7331) ..... | \$257.75 |
|---|----------|

|   |             |
|---|-------------|
| CDM FEDERAL PROGRAMS CORPORATION (68-W9-0002) ..... | \$12,221.16 |
|---|-------------|

|  |              |
|--|--------------|
| ALLIANCE TECHNOLOGIES CORPORATION (68-W9-0003) ..... | \$163,429.63 |
|--|--------------|

**CONTRACT LAB PROGRAM (CLP) COSTS**

|                              |             |
|------------------------------|-------------|
| FINANCIAL COST SUMMARY ..... | \$20,960.34 |
|------------------------------|-------------|

|  |                |
|--|----------------|
| <b>MISCELLANEOUS COSTS (MIS) .....</b> | <b>\$34.68</b> |
|--|----------------|

|                                 |                     |
|---------------------------------|---------------------|
| <b>EPA INDIRECT COSTS .....</b> | <b>\$698,026.84</b> |
|---------------------------------|---------------------|

|  |                       |
|--|-----------------------|
| <b>TOTAL SITE COSTS BEFORE COST RECOVERY COLLECTIONS .....</b> | <b>\$2,874,438.01</b> |
|--|-----------------------|

|                                      |                       |
|--------------------------------------|-----------------------|
| <b>COLLECTIONS/ADJUSTMENTS .....</b> | <b>(\$628,807.51)</b> |
|--------------------------------------|-----------------------|

|                          |                       |
|--------------------------|-----------------------|
| <b>Total Site Costs:</b> | <b>\$2,245,630.50</b> |
|--------------------------|-----------------------|

## GENERAL NOTICE

Peterson/Puritan, Inc. Operable Unit 2  
A list of the names and addresses of Potentially Responsible  
Parties to whom this notification was provided.

### Enclosure D

**Acme Service**

985 Plainfield Street  
Johnston, RI 02919

**ACS Industries, Inc.**

Steve N. Buckler, President  
191 Social Street  
Woonsocket, RI 02895-4835

**Adams Drug Co., Inc.**

c/o CVS Caremark Corporation  
Ms. Christine L. Egan  
Asst. General Counsel  
One CVS Drive  
Woonsocket, RI 02895

**Adv. Envir. Tech.**

Onyx Environmental Services, L.L.C.  
Greig Sidor, General Counsel  
Onyx Environmental Services, L.L.C.  
700 East Butterfield Road, Suite 201  
Lombard, IL 60148

**Aerovox**

Dan Lopes, Facility Manager  
Aerovox  
167 John Vertenta Boulevard  
New Bedford, MA 02745

**Allied Container**

c/o International Paper  
Camille A. Corbin, Senior Counsel  
Environmental, Health & Safety  
6400 Poplar Avenue  
Memphis, TN 38197

**Allied Waste**

c/o Jonathan R. Haden  
Lathrop & Gage L.C.  
2345 Grand Blvd.  
Kansas City, MO 64108

**American Insulated Wire Corporation**

Daniel Gillingham  
Environmental Manager  
36 Freeman Street  
Pawtucket, RI 02862-0880

**American Optical Lens Co.**

c/o Carl Zeiss Vision, Inc.  
Jeremy C. Bishop  
Chief Executive Officer  
Torreyview Corporate Center; Suite 300  
10590 West Ocean Air Drive  
San Diego, CA 92130

**American Steel and Aluminum Corp. (RI)**

c/o United Steel and Aluminum Corp.  
Peter V. Baldoni  
Vice President-Finance and Treasurer  
1050 University Avenue  
Norwood, MA 02062

**Amperex Electronics**

c/o Philips Electronics North America  
Risa H. Weinstock, Senior Counsel  
1251 Avenue of the Americas  
New York, NY 10020

**Arkwright Incorporated**

Jesse Whittemore  
Environmental Manager  
583 Main Street  
P.O. Box 139  
Fiskeville, RI 02823-0139

**Armstrong Cork, Inc.**

Armstrong World Industries, Inc.  
c/o Elizabeth B. Davis  
Womble Carlyle Sandridge & Rice  
1201 West Peachtree Street  
Atlanta, GA 30309

**A.T. Cross Company**  
David G. Whelan  
President  
1 Albion Road  
Lincoln, RI 02865-3700

**Avnet, Inc.**  
2211 South 47<sup>th</sup> Street  
Phoenix, AZ 85034

**Augat, Inc.**  
c/o Thomas & Betts Corporation  
Mr. Michael J. Geiger, Esq.  
Asst. General Counsel  
8155 T&B Boulevard  
Memphis, TN 38125

**Benjamin Moore & Co.**  
Marc L. Zoldessy  
Assistant General Counsel  
51 Chestnut Ridge Road  
Montvale, NJ 07645

**Blane Division of Reichhold Inc.**  
(f/k/a Reichhold Chemicals, Inc.)  
c/o David P. Flynn, Esq.  
Phillips Lytle LLP  
3400 HSBC Center  
Buffalo, NY 14203

**Narragansett Electric Company**  
successor to Blackstone Valley Electric Co.  
c/o Carolyn L. McIntosh, Esq.  
Patton Boggs LLP  
1660 Lincoln Street  
Suite 1900  
Denver, CO 80264

**Boston Edison Company**  
NSTAR Electric & Gas Company  
Jeffrey N. Stevens, Esq.  
800 Boylston Street  
Boston, MA 02199

**Mr. David J. Brask**  
217 O'Neil Boulevard  
Attleboro, MA 02703

**Carol Cable Company**  
General Cable Industries  
c/o Kenneth N. Klass, Esq.  
Blank Rome Comisky & McCauley, LLP  
One Logan Square  
Philadelphia, PA 19103-6998

**CCL Custom Manufacturing, Inc.**  
(Successor to Peterson/Puritan, Inc.)  
6133 North River Road, Suite 800  
Rosemont, IL 60018

**City Hospital**  
Boston Medical Center  
Offices of Facility Management  
715 Albany Street  
Boston, MA 02118

**Clean Harbors, Inc.**  
385 Quincy Avenue  
Braintree, MA 02184

**Coastal Service**  
Coastal Transportation Services  
26 Autumn Pond Park  
East Boston, MA 02128

**Compo Chemical Company, Inc.**  
Mr. Brent Anderson  
IRG Mansfield, LLC  
7991 Shaffer Parkway, Suite 100  
Littleton, CO 80127

**Compugraphic Corp.**  
80 Industrial Way  
Wilmington, MA 01887

**Corning, Inc.**  
1 Riverfront Plaza  
Corning, NY 14830

**Crosby Valve**  
Ellen Roberts  
Controller  
Anderson Greenwood  
3950 Greenbriar  
Stafford, TX 77477

**Crystal Thermoplastics, Inc.**  
c/o Dan Frost, Jr., Esq.  
Skadden, Arps, Slate, Meagher & Flom  
1440 New York Avenue, NW  
Washington, DC 20005

**Cumberland Engineering Company**  
c/o ACS Auxiliaries Group  
Andrew J. Marsh  
Executive Vice President/General Manager  
100 Roddy Avenue  
South Attleboro, MA 02703

**Damon Corporation**  
Dr. David I. Kosowsky  
President  
80 Wilson Way  
Westwood, MA 02090

**Datel, Inc.**  
c/o Murata Power Solutions, Inc.  
Robert C. Caspar  
Director of Finance  
11 Cabot Blvd.  
Mansfield, MA 02048

**Digital Equipment**  
Walt Rosenberg  
Environmental Division-Compaq  
Computer Corporation  
P.O. Box 692000  
Houston, TX 77269

**E.C. Whitney**  
E.C. Whitney & Son  
Donald P. Nagle, Esq.  
Law Offices of Donald P. Nagle, P.C.  
5 Main Street Extension, Suite 300  
Plymouth, MA 02360

**Eastern Wire Products**  
c/o Marvin Granoff  
498 Kinsley Avenue  
Providence, RI 02909-1093

**Eye Research Institute**  
Kimberly Geer  
Schepens Eye Research Institute  
20 Staniford Street  
Boston, MA 02114

**Faulkner Hospital**  
Paul Keating  
Material Management Supervisor  
Faulkner Hospital  
1153 Centre Street  
Jamaica Plain, MA 02130

**Fortifiber Corporation**  
c/o Robert S. Sanoff, Esq.  
Foley Hoag LLP  
155 Seaport Boulevard  
Boston, MA 02210

**Foxboro Co.**  
33 Commercial Street  
Foxboro, MA 02035

**Galego Equities, Inc.**  
Paul F. Galego, President  
c/o Tillinghast, Licht, Perkins & Cohen, LLP  
PO Box 1402  
North Kingstown, RI 02852

**General Electric**  
Mark Herwig  
Leader, Environmental Programs  
General Electric  
1000 Western Avenue (MD 164X9)  
Lynn, MA 01910

**General Tire**  
Rick Ledsinger  
Continental General Tire, Inc.  
1800 Continental Boulevard  
Charlotte, NC 28273

**Gerson Co.**  
Dave Anteski  
Plant Manager  
Louis M. Gerson Company  
15 Sproat Street  
Middleboro, MA 02346

**Gorham Manufacturing**

Patricia Bisshopp  
Environmental Specialist  
Textron, Inc.  
40 Westminster Street  
Providence, RI 02903

**GTE**

Al Ludwig  
Vice President Controller  
GTE Operations Support, Inc.  
600 Hidden Ridge Drive (HQEO3E60)  
Irving, TX 75038

**Halliday Lithograph Corporation**

c/o Crosby, Heafey, Roach & May  
William D. Wick, Esq.  
1999 Harrison Street  
Oakland, CA 94612-3572

**Harvard University**

Donald S. Berry, Esq.  
McDermott, Will & Emery P.C.  
28 State Street, 34<sup>th</sup> Floor  
Boston, MA 02109-1775

Mary T. Feeney, Esq  
Office of the General Counsel  
980 Holyoke Center  
1350 Massachusetts Avenue  
Cambridge, MA 02138

**Hazeltine**

Sue Tynan  
BAE Systems  
115 Bay State Drive  
Braintree, MA 02184

**Hollingsworth & Vose Company**

Deirdre M. Murphy, Esq.  
112 Washington Street  
East Walpole, MA 02032

**Honeywell**

Mr. David P. Cooke  
Assistant General Counsel  
Honeywell  
P.O. Box 2245  
Morristown, NJ 07692-2245

**Henry Oil Co., Inc.**

Carmine Henry DiSanto, President  
675 Hartford Avenue  
Providence, RI 02909

**I.C.I.**

Michelle T. Dillione, Esq.  
AstraZeneca, Inc.  
1800 Concord Pike  
P.O. Box 15438  
Wilmington, DE 19850-5438

**Imperial Knife/Plate**

David A. Swiden  
Consultant  
Imperial Schrade Corp.  
7 Schrade Court  
Ellenville, NY 12428

**J.E. Case, Inc.**

John E. Case  
President  
1320 South Washington Street  
North Attleboro, MA 02760

**Kaiser Aluminum & Chemical Corp.**

Joseph A. "Tre" Fischer II  
Assistant General Counsel  
5847 San Felipe, Suite 2600  
Houston, TX 77057

**Kaman Aerospace**

William Pakunis  
Manager, Environmental Affairs  
P.O. Box 2  
Old Windsor Road  
Bloomfield, CT 06002

**Kmart Corporation**

Louis Zednik  
Sr. Environmental Attorney  
3100 West Big Beaver Road  
Troy, Michigan 48084-3163

**Larson Tool & Stamping Company**

Daniel G. Larson  
President  
90 Olive Street  
P.O. Box 2970  
Attleboro, MA 02703-0970

**Liqwacon**

Envirite Corp.  
James Cassidy, President  
620 West Germantown Pike, Suite 250  
Plymouth Meeting, PA 19462

**Maine Electronics**

Maine Electronics Rockwell International  
River Road  
Lisbon, ME 04250

**Mainline Paint Mft. Co**

Richard Main, President  
768 Main Street  
Pawtucket, RI 02860-3630

**Mandeville Signs, Inc.**

Thomas Mandeville, President  
676 George Washington Highway  
Lincoln, RI 02865

**Linda Marszalkowski**

4651 Gulf Shore Boulevard #1501  
Naples, FL 34103

**Michael John Realty**

176 Sherman Avenue  
Seekonk, MA 02771-4914

**Microfibres, Inc.**

James R. McCulloch, President  
1 Moshassuck Street  
Pawtucket, RI 02860

**Microwave Associates**

Northwest Industrial Park  
South Avenue  
Burlington, MA 01803

**Morse Cutting Tool Division**

William Hagen, President  
Morse Cutting Tool Division  
31695 Stephenson Highway  
Madison Heights, MI 48071

**Mossberg Industries, Inc.**

Gregory L. Benik, Esq.  
McGovern Noel & Benik, Inc.  
One Bank Boston Plaza, Suite 1800  
Providence, RI 02903

**Motorola Law Department**

Lisa Shelton, Esq.  
Motorola Law Department  
770 Parmer Lane  
Austin, TX 78729

**Mule Emergency Lighting, Inc.**

Mr. Robert P. Cross  
President  
325 Valley Street  
Providence, RI 02908

**MW Carr**

M.W. Carr  
68 Gorham Street  
Somerville, MA 02114

**Nunes Disposal, Inc.**

Mendon Road  
Cumberland, RI 02864

**Nyman Manufacturing Company**

Mr. Robert Donnelly  
Project Engineer  
275 Ferris Avenue  
East Providence, RI 02916-1001

**Owens Corning**

Tom Merlino, Esq.  
Director Environmental Liabilities Resolution  
One Owens Corning Parkway  
Toledo, Ohio 43659



**Polaroid**  
784 Memorial Drive  
Cambridge, MA 02139

**Polyvinyl Chemical**  
Zeneca, Inc.  
Joseph C. Kelly, Esq.  
P.O. Box 751  
1800 Concord Pike  
Wilmington, DE 19850-5438

**P&W Railroad**  
President  
Providence and Worcester Railroad Company  
75 Hammond Street  
Worcester, MA 01610

**Raytheon**  
Ken Tierney  
Environmental Health & Safety Officer  
Raytheon Company  
141 Spring Street  
Lexington, MA 02421

**Re-upping**  
Rueping East Tannery  
491 West Water Street  
Taunton, MA 02780

**Revere Copper**  
Wayne Linn  
Environmental Manager  
Revere Copper Products  
24 North Front Street  
New Bedford, MA 02740

**Scott Graphics**  
195 Appleton Street  
Holyoke, MA 01040

**Seaconke Wampanoag Tribe  
Wampanoag Nation, Inc.**  
Chief Wilfred Greene  
2220 Warwick Avenue, Apt. H10  
Warwick, RI 02889-3166

**Sears, Roebuck and Co.**  
James Walpole, Esq.  
3333 Beverly Road 6-370B  
Hoffman Estates, IL 60179

**Sequa**  
Bill Gendreau  
Operations Manager  
General Printing Ink  
320 Forbes Boulevard  
Mansfield, MA 02048-1806

**Shipley Co.**  
455 Forest Street  
Marlborough, MA 01752

**Standard Rubber Products, Inc.**  
c/o Adam J. Brodsky, Esq.  
72 Sharp Street, Unit A9  
Hingham, MA 02043

**Teknor Apex Company**  
David F. Yopak  
Director of Environmental, Health and Safety  
505 Central Avenue  
Pawtucket, RI 02861-1900

**Texas Instruments**  
Mr. Joseph F. Hubach  
Senior Vice President & General Counsel  
P.O. Box 660199  
Dallas, TX 75266-0199

**Texon**  
Jack Dempsey  
Personnel Manager  
Texon USA, Inc.  
1190 Huntington Road  
Russell, MA 01071

**Three R's Trucking**  
c/o Robert G. Funke, Esq.  
58 Tremont Street  
P.O. Box 628  
Taunton, MA 02780

**Timex Clock Co.**  
Timex Corporation  
P.O. Box 310  
Middlebury, CT 06762

**Truex Incorporated**  
Daniel P. Dyer, III, General Manager  
300 Armistice Blvd.  
Pawtucket, RI 02861-2332

**Union Carbide**  
401 Gage Street  
Bennington, VT 05201

**U.S. Envelope**  
c/o MeadWestvaco Corporation  
James A. Buzzard  
President  
11013 West Broad Street  
Glen Allen, VA 23060

**VA Hospital**  
Tim S. McClain  
General Counsel  
Department of Veterans Affairs  
810 Vermont Avenue  
Washington, D.C. 20420

**Valentine Tools and Stamping, Inc.**  
171 West Main Street  
Norton, MA 02766

**Ventron Corp.**  
c/o Rohm and Haas Company  
100 Independence Mall West  
Philadelphia, PA 19106

**Verizon of New England**  
New England Telephone and Telegraph Co.  
David Feldman, Esq.  
1095 Avenue of the Americas  
Room 3806  
New York, NY 10036

**Vinyl Packaging, Inc.**  
Leonard Accardo, Jr., Esq.  
Accardo Law Offices  
311 Angell Street  
Providence, RI 02906

**Waste Management of North America**  
3003 Butterfield Road  
Oak Brook, IL 60521

**Western Electric**  
1600 Osgood Street  
North Andover, MA 01845

**Wyman-Gordon Company**  
Bradford C. Middlesworth, P.E.  
Manager of Environmental Engineering  
244 Worcester Street  
P.O. Box 8001  
North Grafton, MA 01536-8001



Office of Enforcement and Compliance Assurance

## INFORMATION SHEET

### U. S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance resources such as workshops, training sessions, hotlines, websites, and guides to assist you in complying with federal and state environmental laws. These resources can help you understand your environmental obligations, improve compliance, and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

#### Compliance Assistance Centers

([www.assistancecenters.net](http://www.assistancecenters.net))

In partnership with industry, universities, and other federal and state agencies, EPA has established Compliance Assistance Centers that provide information targeted to industries with many small businesses.

##### Agriculture

([www.epa.gov/agriculture](http://www.epa.gov/agriculture) or 1-888-663-2155)

##### Automotive Recycling Industry

([www.ecarcenter.org](http://www.ecarcenter.org))

##### Automotive Service and Repair

([www.ccar-greenlink.org](http://www.ccar-greenlink.org) or 1-888-GRN-LINK)

##### Chemical Industry

([www.chemalliance.org](http://www.chemalliance.org))

##### Construction Industry

([www.cicacenter.org](http://www.cicacenter.org) or 1-734-995-4911)

##### Education

([www.campuserc.org](http://www.campuserc.org))

##### Healthcare Industry

([www.hercenter.org](http://www.hercenter.org) or 1-734-995-4911)

##### Metal Finishing

([www.nmfrc.org](http://www.nmfrc.org) or 1-734-995-4911)

##### Paints and Coatings

([www.paintcenter.org](http://www.paintcenter.org) or 1-734-995-4911)

##### Printed Wiring Board Manufacturing

([www.pwbrc.org](http://www.pwbrc.org) or 1-734-995-4911)

##### Printing

([www.pneac.org](http://www.pneac.org) or 1-888-USPNEAC)

#### Transportation Industry

([www.transource.org](http://www.transource.org))

#### Tribal Governments and Indian Country

([www.epa.gov/tribal/compliance](http://www.epa.gov/tribal/compliance) or 202--564-2516)

#### US Border Environmental Issues

([www.bordercenter.org](http://www.bordercenter.org) or 1-734-995-4911)

The Centers also provide State Resource Locators ([www.envcap.org/statetools/index.cfm](http://www.envcap.org/statetools/index.cfm)) for a wide range of topics to help you find important environmental compliance information specific to your state.

#### EPA Websites

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. If you don't have access to the Internet at your business, many public libraries provide access to the Internet at minimal or no cost.

##### EPA's Home Page

[www.epa.gov](http://www.epa.gov)

##### Small Business Gateway

[www.epa.gov/smallbusiness](http://www.epa.gov/smallbusiness)

##### Compliance Assistance Home Page

[www.epa.gov/compliance/assistance](http://www.epa.gov/compliance/assistance)

##### Office of Enforcement and Compliance Assurance

[www.epa.gov/compliance](http://www.epa.gov/compliance)

##### Voluntary Partnership Programs

[www.epa.gov/partners](http://www.epa.gov/partners)



## U.S. EPA SMALL BUSINESS RESOURCES

### Hotlines, Helplines & Clearinghouses

([www.epa.gov/epahome/hotline.htm](http://www.epa.gov/epahome/hotline.htm))

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. A few examples are listed below:

#### Clean Air Technology Center

([www.epa.gov/ttn/catc](http://www.epa.gov/ttn/catc) or 1-919-541-0800)

#### Emergency Planning and Community Right-To-Know Act

([www.epa.gov/superfund/resources/infocenter/epcra.htm](http://www.epa.gov/superfund/resources/infocenter/epcra.htm) or 1-800-424-9346)

EPA's **Small Business Ombudsman Hotline** provides regulatory and technical assistance information. ([www.epa.gov/sbo](http://www.epa.gov/sbo) or 1-800-368-5888)

The **National Environmental Compliance Assistance Clearinghouse** provides quick access to compliance assistance tools, contacts, and planned activities from the U.S. EPA, states, and other compliance assistance providers ([www.epa.gov/clearinghouse](http://www.epa.gov/clearinghouse))

**National Response Center** to report oil and hazardous substance spills.

([www.nrc.uscg.mil](http://www.nrc.uscg.mil) or 1-800-424-8802)

#### Pollution Prevention Information Clearinghouse

([www.epa.gov/opptintr/ppic](http://www.epa.gov/opptintr/ppic) or 1-202-566-0799)

#### Safe Drinking Water Hotline

([www.epa.gov/safewater/hotline/index.html](http://www.epa.gov/safewater/hotline/index.html) or 1-800-426-4791)

#### Stratospheric Ozone Refrigerants Information

([www.epa.gov/ozone](http://www.epa.gov/ozone) or 1-800-296-1996)

**Toxics Assistance Information Service** also includes asbestos inquiries.

(1-202-554-1404)

#### Wetlands Helpline

([www.epa.gov/owow/wetlands/wetline.html](http://www.epa.gov/owow/wetlands/wetline.html) or 1-800-832-7828)

### State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information or the following two resources:

#### EPA's Small Business Ombudsman

([www.epa.gov/sbo](http://www.epa.gov/sbo) or 1-800-368-5888)

#### Small Business Environmental Homepage

([www.smallbiz-enviroweb.org](http://www.smallbiz-enviroweb.org) or 1-724-452-4722)

### Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations before an enforcement action has been initiated,

businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses:

#### The Small Business Compliance Policy

([www.epa.gov/compliance/incentives/smallbusiness](http://www.epa.gov/compliance/incentives/smallbusiness))

#### Audit Policy

([www.epa.gov/compliance/incentives/auditing](http://www.epa.gov/compliance/incentives/auditing))

### Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an SBA Ombudsman and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. If you believe that you fall within the Small Business Administration's definition of a small business (based on your North American Industry Classification System (NAICS) designation, number of employees, or annual receipts, defined at 13 C.F.R. 121.201; in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

Every small business that is the subject of an enforcement or compliance action is entitled to comment on the Agency's actions without fear of retaliation. EPA employees are prohibited from using enforcement or any other means of retaliation against any member of the regulated community in response to comments made under SBREFA.

### Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

*EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act or related provisions.*

U.S. Postal Service  
**CERTIFIED MAIL RECEIPT**  
(Domestic Mail Only; No Insurance Coverage Provided)

**O F F I C I A L U S E**

**JUL 14 2011**

Postmark  
Here

|   |           |
|---|-----------|
| Postage   | \$        |
| Certified Fee                                     |           |
| Return Receipt Fee<br>(Endorsement Required)      |           |
| Restricted Delivery Fee<br>(Endorsement Required) |           |
| <b>Total Postage &amp; Fees</b>                   | <b>\$</b> |

**Sent To**

Street, Apt. 1  
or PO Box N

City, State, 2

**Thomas & Betts Corporation**  
**c/o Mr. Michael J. Geiger, Esq.**  
**Asst. General Counsel**  
**8155 T&B Boulevard**  
**Memphis, TN 38125**

CTER 9L59 91111 0991 21111

## **Certified Mail Provides:**

- A mailing receipt
- A unique identifier for your mailpiece
- A signature upon delivery
- A record of delivery kept by the Postal Service for two years

### ***Important Reminders:***

- Certified Mail may **ONLY** be combined with First-Class Mail or Priority Mail.
- Certified Mail is not available for any class of international mail.
- **NO INSURANCE COVERAGE IS PROVIDED** with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "*Return Receipt Requested*". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "*Restricted Delivery*".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

**IMPORTANT: Save this receipt and present it when making an inquiry.**

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**Thomas & Betts Corporation**  
**c/o Mr. Michael J. Geiger, Esq.**  
**Asst. General Counsel**  
**8155 T&B Boulevard**  
**Memphis, TN 38125**

2. Article Number

(Transfer from service label)

**7002-0860-0000-6596-8315****COMPLETE THIS SECTION ON DELIVERY**

A. Signature

**X***Rob J. Geiger* Agent Addressee

B. Received by (Printed Name)

*Rob J. Geiger*

C. Date of Delivery

*7-20-11*D. Is delivery address different from item 1?  Yes

If YES, enter delivery address below:

 No

3. Service Type

 Certified Mail Express Mail Registered Return Receipt for Merchandise Insured Mail C.O.D.

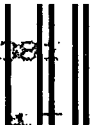
4. Restricted Delivery? (Extra Fee)

 Yes

UNITED STATES POSTAL SERVICE

MEMPHIS TN 381

21 JUL 2011 PM 4 T



First Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Donna Murray  
US EPA Region I NE  
Mail Code: OSRR07-2  
5 Post office Square, Suite 100  
Boston, MA 02109-3912



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