UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
EPA New England, Region 1
5 Post Office Sq., Suite 100
Boston, MA 02109-3912

Superfund Records Center
SITE: Centredale
BREAK: 11-9
OTHER: 494712

GENERAL NOTICE LETTER
URGENT LEGAL MATTER
PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

September 23, 2011

Ms. Jeanne Thoma
President
Lonza, Inc.
90 Boroline Road
Allendale, NJ 07401

Re: Notice of Potential Liability for the Centredale Manor Restoration Project Superfund Site in North Providence, Rhode Island

Dear Ms. Thoma:

This letter serves to formally notify Lonza, Inc. of the potential liability which it has or may have incurred with respect to the Centredale Manor Restoration Project Superfund Site ("the Site") located in North Providence, Rhode Island. 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 cleanup activities at the Site.

Explanation of Potential Liability

The U.S. Environmental Protection Agency ("EPA") has documented the release or threatened release of hazardous substances, pollutants or contaminants at the Site. EPA has spent and is considering spending additional public funds on actions to investigate and control such releases or threatened releases. Unless EPA reaches an agreement under which a responsible party or parties such as yourself will properly perform or finance such actions, EPA may itself perform these actions or order responsible parties to perform these actions pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9601 et seq. ("CERCLA"), commonly known as the federal "Superfund" law.

Under Sections 106(a) and 107(a) of CERCLA, potentially responsible parties ("PRPs") may be required to perform cleanup actions to protect the public health, welfare, or the environment. PRPs may also be responsible for costs incurred by EPA in cleaning up the Site, unless the PRP can show divisibility or any of the other statutory defenses. Such costs may include, but are not limited to, expenditures for investigation, planning, cleanup response and enforcement activities. In addition, PRPs may be required to pay damages for injury to, destruction of, or loss of natural resources, including the costs to assess such damages.

SDMS DocID 494712

PRPs include current and former owners and operators of a Site, as well as persons who arranged for treatment and/or disposal of any hazardous substances found at the site, and persons who accepted hazardous substances for transport and selected the site to which the hazardous substances were delivered.

EPA has evaluated a large body of evidence in connection with its investigation of the Site, including witness interviews; written statements and depositions from persons familiar with activities at the former chemical and drum refurbishing companies that operated at the Site; and responses to CERCLA Section 104(e) information requests. Based on the information collected, EPA has reason to believe that Lonza, Inc. is the legal successor to Universal Chemicals Corporation which may be liable under Section 107(a) of CERCLA as an arranger, who by contract, agreement or otherwise arranged for the 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, and to prepare to voluntarily perform or finance future response activities which EPA determines are necessary to address the contamination at the Site.

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 $21 million, 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), 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.

Response Activities at the Site

EPA has conducted or is planning in the future to conduct the following activities at the Site:

1. Previous Site activities:

Previous activities by EPA

- established site security;
- restricted access to contaminated soils;
- conducted certain characterization activities to assist in determining the extent of contamination at the Site;
- installed one and partially installed a second interim cap over two contaminated soil areas at the Site;

- conducted an Engineering Evaluation/Cost Analysis for addressing the breached Allendale Dam and contaminated soil and sediment on residential-use properties;
- conducted a remedial investigation to identify the characteristics of the Site, to define the nature and extent of soil, sediment, air, surface water and ground water contamination at the Site, and to characterize the risk posed by the Site; and
- conducted a feasibility study to evaluate a number of different means for addressing the contamination at the Site and the risks posed by that contamination.

Previous activities by PRPs

- completed installation of a second interim cap over a contaminated soil area at the Site;
- completed the restoration of the Allendale Dam;
- sampled, analyzed, excavated and disposed of contaminated soils and sediments located in areas accessible by residential and recreational users;
- completed the reconstruction of the tail-race, including the construction of a cap over contaminated soil and sediment and construction of a drainage swale to prevent migration;
- performed studies and investigations to assist EPA in its analysis of the conditions that would potentially result from the removal of the Allendale and Lyman Mill Dams; and
- performed excavation and off-site disposal of contaminated soil and construction of an engineered cap to minimize migration of contamination in groundwater to the Woonasquatucket River.

2. Current Site activities:

Current activities by EPA

- preparation of a proposed plan (with a Feasibility Study addendum) that will set forth EPA's proposed cleanup remedy for the Site.

3. Future Site activities:

Future work shall include the design and implementation of the remedial action to be selected and approved by EPA for the Site and any operation, maintenance and monitoring activities necessary at the Site. Future work at the Site may also include removal actions to address any remaining sources of contamination.

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

Future Special Notice and Negotiation Moratorium

At an appropriate point in the future, EPA will send to you, or a person you designate to represent you, a notice informing you that one or more of the above activities is pending and that your cooperation is being requested to negotiate an agreement to perform or finance those

activities.

This forthcoming notice will tell you whether EPA has decided to use the "Special Notice" procedures pursuant to CERCLA Section 122(e), 42 U.S.C. § 9622(e), to formally negotiate the terms of a consent order or consent decree to conduct or finance response activities at the Site. If EPA does not use Section 122(e) Special Notice procedures, the notice will explain to you why EPA has determined that those procedures are not appropriate for this Site.

If EPA chooses to employ the Special Notice procedures under Section 122(e) of CERCLA, that notice will commence formal negotiations between EPA and the PRPs. This notice will also trigger 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 negotiate a settlement.

Financial Concerns/Ability to Pay Settlements

EPA is aware that the financial ability of some PRPs to contribute toward the payment of response costs at a site may be substantially limited. If you believe, and can document, that you fall within that category, please contact Eve Vaudo at (617) 918-1089 for information on "Ability to Pay Settlements." In response, you will receive a package of information about the potential for such settlements and a form to fill out with information about your finances, and you will be asked to submit financial records including business [and personal] federal income tax returns. If EPA concludes that Lonza, Inc. has a legitimate inability to pay the full amount of EPA's costs, EPA may offer a schedule for payment over time or a reduction in the total amount demanded from you.

Also, please note that, because EPA has a potential claim against you, you must include EPA as a creditor if you file for bankruptcy.

Information to Assist You

EPA would like to encourage communication between you, other PRPs, and EPA at the Site. EPA recommends that all PRPs meet to select a "steering committee" that will be responsible for representing the group's interests. Establishing a manageable group is critical to successful negotiations with EPA. If this is not possible, EPA encourages each PRP to select one person from its company or organization to represent its interests to EPA.

To assist you in your efforts to communicate, please find the following attached information:

1. A list of names and addresses of PRPs to whom this letter is being sent (Enclosure A).

2. A list of names and addresses of PRPs previously identified for this Site (Enclosure B).

3. An evidentiary summary which sets forth the documentary evidence which indicates, along with other investigatory information gathered by EPA, that you

are a PRP for this Site (Enclosure C).

4. A compact disk set (with user manual) that contains evidentiary documents including responses to EPA's information requests; deposition transcripts; and summaries of interviews or written statements from former employees of the companies that previously operated at the Site (Enclosure D). EPA will issue an updated disk periodically as new documents are issued and received.

5. A compact disk set that contains that portion of the ongoing administrative record file that is not available on EPA's website (Enclosure E).

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 actions for the Site.

The administrative record file for past response actions is available to the public for inspection at:

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

Please call the EPA Records Center at (617) 918-1440 for current hours and directions.

This administrative record file is also available at North Providence Union Free Library, 1810 Mineral Springs Ave., North Providence RI 02911 and Marion J. Mohr Memorial Library, 1 Memorial Avenue, Johnston, RI 02919.

In addition, this administrative record file, along with a copy of EPA's April 2010 Interim Feasibility Study, is available at http://www.epa.gov/region01/superfund/resource/centredale.htm.

In most cases, EPA seeks an active dialogue with PRPs regarding the search for additional PRPs. If you have evidence regarding the liability of any party for response actions at the Site which has not already been provided to EPA, you should provide that information no later than thirty (30) days from the date of this letter. You should note that any evidence which you gather and offer to EPA regarding other PRPs will be subject to independent evaluation by EPA. Therefore, this evidence must be reliable and sufficiently detailed to be verified by EPA.

Orphan Share Information

Pursuant to the Superfund Reforms, when EPA enters into certain settlements, EPA may compensate settlors for a portion of the shares specifically attributable to insolvent and defunct PRPs ("orphan share"), if any. EPA believes that there may be PRPs at this site who are insolvent or defunct. If in the future you, either individually or with other PRPs, enter into a cost recovery or RD/RA settlement with EPA and provide sufficient information about the existence, liability, and relative shares of responsibility of insolvent and defunct PRPs, EPA will analyze

the information and determine whether to consider the shares of these parties in the amount of past costs and future oversight costs which EPA will seek to recover in such settlement.

Resources and Information for Small Businesses

As you may be aware, on January 11, 2002, President Bush signed into law the Superfund Small Business Liability Relief and Brownfields Revitalization Act. This Act contains several exemptions and defenses to CERCLA liability, which we suggest that all parties evaluate. You may obtain a copy of the law via the Internet at http://www.epa.gov/swerosps/ bf/sblrbra.htm and review EPA guidances regarding these exemptions at http://www.epa.gov/ compliance/resources/policies/cleanup/superfund.

EPA has created a number of helpful resources for small businesses. EPA has established the National Compliance Assistance Clearinghouse as well as Compliance Assistance Centers which offer various forms of resources to small businesses. You may inquire about these resources at http://www.epa.gov. In addition, the EPA Small Business Ombudsman may be contacted at http://www.epa.gov/sbo. Finally, EPA developed a fact sheet about the Small Business Regulatory Enforcement Fairness Act ("SBREFA"), which is enclosed with this letter.

Timing and Form of Response to this Letter

As a PRP, you should notify EPA in writing within 30 days from the date of this letter of your receipt of this letter, and your willingness to join the other PRPs in addressing the contamination at the Site, and in paying EPA's outstanding response costs set out in this letter. Your response 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 cleanup 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 with respect to any such activities. EPA requests that you report the status of such Site-related activities in your response to this letter.

Your response letter should be sent to:

Anna Krasko
EPA-New England
5 Post Office Square, Suite 100
Mail Code OSRR07-1
Boston, MA 02109-3912

If EPA does not receive a timely response to this letter, EPA will assume that you do not wish to negotiate a resolution of your liabilities in connection with the Site and that you have declined any involvement in performing the response activities, and paying outstanding costs.

If you have questions regarding the Site or this notice letter, please contact Anna Krasko at (617) 918-1232. If you have an attorney representing you in this matter, please direct his or her questions to Eve Vaudo of the EPA Office of Environmental Stewardship at (617) 918-1089.

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. Please give these matters your immediate attention and consider consulting with an attorney.

Sincerely,

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

Enclosures

cc: David J. Freeman, Esq., Paul, Hastings, Janofsky & Walker LLP
John Langlois, Esq., RIDEM Legal Services
Louis Maccarone, RIDEM Remedial Project Manager
Jerome MacLaughlin, Esq.,USDOJ
Eve Vaudo, Esq., EPA Office of Environmental Stewardship
Anna Krasko, EPA Remedial Project Manager
Stacy Greendlinger, EPA Community Involvement Coordinator
Patty Ludwig, EPA Wastelan Coordinator

United States Environmental Protection Agency

Office of Enforcement and Compliance Assurance (2201A)
EPA-300-F-11-006 June 2011

U.S. EPA Small Business Resources Information Sheet

The United States Environmental Protection Agency provides an array of resources, including workshops, training sessions, hotlines, websites and guides, to help small businesses understand and comply with federal and state environmental laws. In addition to helping small businesses understand their environmental obligations and improve compliance, these resources will also help such businesses find cost-effective ways to comply through pollution prevention techniques and innovative technologies.

EPA's Small Business Websites

Small Business Environmental Homepage - www.smallbiz-enviroweb.org

Small Business Gateway - www.epa.gov/smallbusiness

EPA's Small Business Ombudsman - www.epa.gov/sbo or 1-800-368-5888

EPA's Compliance Assistance Homepage
www.epa.gov/compliance/assistance/business.html

This page is a gateway to industry and statute-specific environmental resources, from extensive web-based information to hotlines and compliance assistance specialists.

EPA's Compliance Assistance Centers
www.assistancecenters.net

EPA's Compliance Assistance Centers provide information targeted to industries with many small businesses. They were developed in partnership with industry, universities and other federal and state agencies.

Agriculture
www.epa.gov/agriculture/

Automotive Recycling
www.ecarcenter.org

Automotive Service and Repair
www.ccar-greenlink.org or 1-888-GRN-LINK

Chemical Manufacturing
www.chemalliance.org

Construction
www.cicacenter.org or 1-734-995-4911

Education
www.campuserc.org

Food Processing
www.fpeac.org

Healthcare
www.hercenter.org

Local Government
www.lgean.org

Metal Finishing
www.nmfrc.org

Paints and Coatings
www.paintcenter.org

Printed Wiring Board Manufacturing
www.pwbrc.org

Printing
www.pneac.org

Ports
www.portcompliance.org

U.S. Border Compliance and Import/Export Issues
www.bordercenter.org

Hotlines, Helplines and Clearinghouses

www.epa.gov/epahome/hotline.htm

EPA sponsors many free hotlines and clearinghouses that provide convenient assistance regarding environmental requirements. Some examples are:

Antimicrobial Information Hotline
info-antimicrobial@epa.gov or 1-703-308-6411

Clean Air Technology Center (CATC) Info-line
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 or 1-800-424-9346

EPA Imported Vehicles and Engines Public Helpline
www.epa.gov/otaq/imports or 734-214-4100

National Pesticide Information Center
www.npic.orst.edu/ or 1-800-858-7378

National Response Center Hotline - to report oil and hazardous substance spills
www.nrc.uscg.mil or 1-800-424-8802

Pollution Prevention Information Clearinghouse (PPIC)
www.epa.gov/opptintr/ppic or 1-202-566-0799

Safe Drinking Water Hotline
www.epa.gov/safewater/hotline/index.html or 1-800-426-4791

Stratospheric Ozone Protection Hotline
www.epa.gov/ozone or 1-800-296-1996

Toxic Substances Control Act (TSCA) Hotline
tsca-hotline@epa.gov or 1-202-554-1404

Wetlands Information Helpline
www.epa.gov/owow/wetlands/wetline.html or 1-800-832-7828

State and Tribal Web-Based Resources

State Resource Locators
www.envcap.org/statetools

The Locators provide state-specific contacts, regulations and resources covering the major environmental laws.

State Small Business Environmental Assistance Programs (SBEAPs)
www.smallbiz-enviroweb.org

State SBEAPs help small businesses and assistance providers understand environmental requirements and sustainable business practices through workshops, trainings and site visits. The website is a central point for sharing resources between EPA and states.

EPA's Tribal Compliance Assistance Center
www.epa.gov/tribalcompliance/index.html

The Center provides material to Tribes on environmental stewardship and regulations that might apply to tribal government operations.

EPA's Tribal Portal
www.epa.gov/tribalportal/

The Portal helps users locate tribal-related information within EPA and other federal agencies.

EPA 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 such policies that may apply to small businesses:

EPA's Small Business Compliance Policy
www.epa.gov/compliance/incentives/smallbusiness/index.html

This Policy offers small businesses special incentives to come into compliance voluntarily.

EPA's Audit Policy
www.epa.gov/compliance/incentives/auditing/auditpolicy.html

The Policy provides incentives to all businesses that voluntarily discover, promptly disclose and expeditiously correct their noncompliance.

Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established a SBREFA 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 designation, number of employees or annual receipts, as 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), or go to their website at www.sba.gov/ombudsman.

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 a comment 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.

ENCLOSURE A

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

1. Exxon Mobil Corporation

Joanne W. Eaglet
Project Manager
ExxonMobil Evironmental Services Company
3225 Gallows Road, Rm. 8B0830
Fairfax, VA 22037-0001
(P): (703) 846-3354
(F): (703) 846-5257

Kevin J. Vaughan
Counsel
Exxon Mobil Corporation
3225 Gallows Road, Rm. 3D0212
Fairfax, VA 22037-0001
(P): (703) 846-4416
(F): (703) 846-5872

2. Lonza, Inc.

Ms. Jeanne Thoma
President
Lonza, Inc.
90 Boroline Road
Allendale, NJ 07401

David J. Freeman, Esq.
Paul, Hastings, Janofsky & Walker LLP
75 East 55th Street
New York, NY 10021
(P): (212) 318-6555
(F): (212) 230-7638

3. Woburn Steel Drum, Incorporated

Mr. Stephen Dagata
Woburn Steel Drum, Incorporated
211 New Boston Street
Woburn, MA 01801
(P): (781) 933-3329
(F): (781(933-5903

ENCLOSURE B

September 2011

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

1. A. Harrison & Co., Inc.

   Richard R. Harrison
   President
   A. Harrison & Co., Inc.
   35 Hurdis Street
   North Providence, RI 02904
   (P): (401) 725-7450
   (F): (401) 725-3570

2. American Mineral Spirits Company

   Richard T. Hughes
   Senior Counsel, Environmental Practice Group
   Law Department
   Chevron U.S.A. Inc.
   1600 Smith Street, 27038B
   Houston, TX 77210
   (P): (713) 754-7856
   (F): (713) 754-7873
   Rhughes@chevron.com

3. BNS Co.

   Richard A. Sherman, Esq.
   Edwards Angell Palmer & Dodge LLP
   2800 Financial Plaza
   Providence, RI 02903
   (P): (401) 276-6513
   (F): (888) 325-9062
   rsherman@eapdlaw.com

4. Ciba Specialty Chemicals Corporation (BASF Corp.)

Catherine A. Trinkle, Esq.
Counsel
BASF Corporation
100 Campus Drive
Florham Park, NJ 07932
(P): (973) 245-6015
(F): (973) 245-6711
catherine.trinkle@basf.com

R. Howard Grubbs, Esq.
Womble Carlyle Sandridge & Rice, PLLC
P.O. Box 10208
Greenville, SC 29603-0208
hgrubbs@wcsr.com

5. Cal Chemical Corporation

Gardner H. Palmer, Jr. Esq.
Law Office of Joseph M. DiOrio, Inc.
144 Westminster Street
Suite 302
Providence, RI 02903
(P): (401) 632-0911
(F): (401) 632-0751
ghpalmer@dioriolaw.com

Charles A. Lamendola
President
P.O. Box 1452
592 Arnold Road
Coventry, RI 02816
(P): (401) 821-0320
(F): (401) 823-5001

6. CNA Holdings, Inc.

David B. Graham, Esq.
Kaufman & Canoles, P.C.
4801 Courthouse Street, Suite 300
Williamsburg, VA 23188
(P): (757) 259-3855
(F): (757) 259-3838
dbgraham@kaufcan.com

7. ConocoPhillips Company

Ms. Willette A. DuBose
Senior Legal Assistant
ConocoPhillips Company
Legal-ML 1116
600 North Dairy Ashford
Houston, TX 77079
(P): (281) 293-6952
(F): (281) 293-1987
willette.a.dubose@conocophillips.com

8. Cranston Print Works Company

Steven M. McInnis, Esq.
38 Bellevue Avenue
Newport, Rhode Island 02840
(P): (401) 841-8480
(F): (401) 841-8555
steve@mcinnislaw.com

9. Crown-Metro, Inc.

Knox L. Haynsworth, III, Esq.
Brown, Massey, Evans, McLeod & Haynsworth, LLC
P.O. Box 2464
Greenville, SC 29602
(P): (864) 271-7424
(F): (864) 242-6469
knoxhaynsworth@bmemhlaw.com

10. Duro Industries, Division of Duro Textiles LLC

Alexandra K. Callam
Hinckley, Allen Snyder LLP
50 Kennedy Plaza, Suite 1500
Providence, RI 02903-2319
(P): (401) 274-2000
(F): (401) 277-9600
acallam@haslaw.com

Mansour Nejad
Vice President of Engineering
Duro Textiles LLC
110 Chace Street
P.O. Box A
Fall River, MA 02724
(P): (508) 675-0101
(F): (508) 678-0170

11. Eastern Color & Chemical Company

Gregory L. Benik, Esq.
Benik & Associates P.C.
931 Jefferson Boulevard, Suite 2008
Warwick, RI 02886
(P): (401) 454-0054
(F): (401) 732-5054
gbenik@jreri.com

Mr. Barry S. Shepard
President
Eastern Color & Chemical Company
35 Livingston Street
Providence, RI 02904
(P): (401) 331-9000
(F): (401) 331-2155

12. Eastern Resins Corp.

David A. Viola
President
Eastern Resins Corp.
1174 River Street
P.O. Box 1206
Woonsocket, RI 02895
(P): (401) 769-6700
(F): (401) 769-6710

13. Eli Lilly and Company

Michelle A. Gale, Esq.
Todd C. Schebor
Dykema Gossett PLLC
400 Renaissance Center
Detroit, Michigan 48243
(P): (313) 568-6672
(F): (313) 568-6701
tschebor@dykema.com

14. Emhart Industries, Inc.

Jerome C. Muys, Jr., Esq.
Sullivan & Worcester
1666 K Street, N.W.
Washington, DC 20006
(P): (202) 370-3920
(F): (202) 293-2275
jmuys@sandw.com

15. Indusol, Inc.

John K. McGuire, Jr.
McGuire & McGuire, P.C.
14 Harvard Street
Worcester, MA 01609
(P): (508) 754-3291
(F): (508) 798-9415

16. New England Container Company, Inc.

Kirstin M. Etela, Esq.
Robinson & Cole LLP
1055 Washington Boulevard
Stamford, CT 06901-2249
(P): 203-462-7534
(F): 203-462-7599
ketela@rc.com

17. Northeast Products Company, Inc.

Alexandra K. Callam, Esq.
Hinckley, Allen & Snyder LLP
50 Kennedy Plaza
Suite 1500
Providence, RI 02903-2393
(P): 401-274-2000
(F): 401-277-9600
acallam@haslaw.com

18. Organic Dyestuffs Corporation

Greg Gormley
Organic Dyestuffs
P.O. Box 14258
East Providence, RI 02914
(P): 401-434-3300
greg@organicdye.com

19. Refinity Corporation

Jeffrey Plank
9 Hemlock Road
Weston, MA 02493
jplank@refinity.cc

20. Sequa Corporation

Irvin M. Freilich, Esq.
Director
Gibbons P.C.
One Gateway Center
Newark, NJ 07102-5310
(P): (973) 596-4735
(F): (973) 639-6232
ifreilich@gibbonslaw.com

21. The Original Bradford Soap Works, Inc.

Richard A. Sherman, Esq.
Edwards & Angell, LLP
2800 Financial Plaza
Providence, RI 02903
(P): 401-276-6513
(F): 401-276-6611
rsherman@eapdlaw.com

22. Teknor Apex Company

Bret W. Jedele, Esq.
Chace Ruttenberg & Freedman LLP
One Park Row
Suite 300
Providence, RI 02903
(P) 401-453-6400
(F) 401-453-6411
bjedele@crflp.com

Mr. David F. Yopak
Director of Environmental, Health and Safety
Teknor Apex Company
505 Central Avenue
Pawtucket, RI 02861-1900
(P) 401-725-8000
(F) 401-725-0978
dyopak@teknorapex.com

23. THBC, Inc.

Mr. Charles E. Bradley
President
THBC, Inc.
c/o Stanwich Partners, Inc.
62 Southfield Avenue
Stamford, CT 06902

Scott Junkin, Esq.
Reid and Riege, PC
195 Church Street
15th Floor
New Haven, CT 06510
(P): (203) 777-8008
(F): (203) 777-6304
sjunkin@reidandriege.com

24. United States Department of the Navy

Chin-Zen L. Plotner
Senior Litigation Attorney
Navy Litigation Office
Department of the Navy
Office of the General Counsel
Navy Litigation Office
720 Kennon Street, SE Rm 233
Washington Navy Yard, DC 20374-5013
(P): 202-686-6977
chinzen.plotner@navy.mil

Joshua Levin, Esq.
U.S. Department of Justice
Environmental and Natural Resources Division
Environmental Defense Section
P.O. Box 23986
Washington, DC 20026-3986
(P): 202-514-4198
joshua.levin@usdoj.gov

25. United States Air Force

Brian P. Turcott, Esq.
Deputy Regional Counsel
Department of the Air Force
Air Force Legal Operations Agency (AFLOA)
Regional Environmental Counsel, Eastern Region
60 Forsyth St, SW, Suite 8M80
Atlanta, GA 30303-8810
(P): 404-562-4215
brian.turcott@brooks.af.mil

Joshua Levin, Esq.
U.S. Department of Justice
Environmental and Natural Resources Division
Environmental Defense Section
P.O. Box 23986
Washington, DC 20026-3986
(P): 202-514-4198
joshua.levin@usdoj.gov

ENCLOSURE C

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

Lonza, Inc.
90 Boroline Road
Allendale, NJ 07401

Evidentiary Summary

Pursuant to a Plan of Merger of Universal Chemicals Corporation ("Universal Chemicals") Into Lonza, Inc., dated June 1973, Universal Chemicals merged into Lonza, Inc. ("Lonza") with Lonza continuing as the surviving corporation. According to Lonza's October 17, 2008 response to EPA's July 1, 2008 Information Request ("Lonza's Response"), Universal Chemicals owned and operated a facility located at 1224 Mendon Road in Cumberland, RI, prior to 1973. Universal Chemicals manufactured synthetic detergents at the facility. In 1973, Lonza merged with Universal Chemicals and acquired the Universal Chemicals business and facility as part of the merger. Lonza continued to manufacture specialty chemicals at the facility for use in the formulation of detergents.

New England Container Company, Inc. ("NECC") operated a drum recycling business at 2074 Smith Street in North Providence, Rhode Island from approximately 1952 to approximately mid-1971. This property is now part of the Centredale Manor Restoration Project Superfund Site ("Site"). EPA has requested and received information from NECC about its operations. In responses to EPA's requests for information, NECC provided EPA with a list of companies whose drums were taken to the Site for refurbishing. Universal Chemicals is on that list. (NECC Responses dated February 12, 2002 and August 22, 2002.) In addition, a business relationship between Universal Chemicals and NECC was confirmed in a deposition of Vincent Buonanno taken on March 28, 2003 in Russell-Stanley Holdings v. Vincent Buonanno (U.S. Dist. Ct., So. District of NY). Mr. Buonanno, whose father was a part owner of NECC, worked at NECC in the summers in the early 1960s; became a salesperson in 1967; and eventually became the Chief Executive Officer. Specifically, Mr. Buonanno stated that Universal Chemicals was a customer of NECC.

EPA personnel have interviewed many former employees of NECC and former residents of the area. EPA has concluded that NECC's recycling operations resulted in contamination at the Site. NECC received drums by truck. The drums were then unloaded and stacked on the ground. The contents of some of the drums leaked onto the ground. Drums were then placed upside down on a conveyor belt inside a furnace. The drum contents either drained into a pit located under the conveyor belt or were burned out. Ash from the incineration process either fell into the pit or was swept into the pit. (The liquid contents of some drums may have been emptied into other drums or onto the ground before being placed on the conveyor belt.) The contents of the pits were emptied periodically into drums. Those drums or the contents of those drums were then taken to an area south of the facility (but still within the Site property) and dumped. Residents

living near the Site observed the dumping of drums in this area. In addition, residents observed bulldozers burying drums into the ground.