

October 13, 2009

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, New York 10007-1866

Re: Ampacet Corporation
Docket No. TSCA-02-2009-9243

U.S. ENVIRONMENTAL
PROTECTION AGENCY-REG. II
2009 OCT 15 PM 2:16
REGIONAL HEARING
CLERK

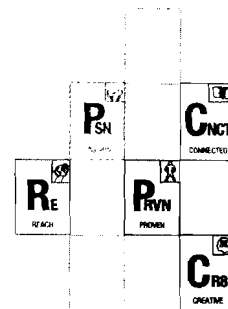
Dear Sir or Madam,

In reference to the above docket number, we hereby request a formal extension to the 30 day response period in order to file our Answer to this Complaint and Notice, to enable us to obtain answers to questions raised in the complaint and collect necessary data from a variety of sources and suppliers within the U.S. and foreign countries. At this time, we have also requested an informal conference with Naomi Shapiro, Assistant Regional Counsel, to discuss our questions.

We appreciate your time and await your response.

Sincerely Yours,

Robert A. DeFalco
President & CEO



October 13, 2009

Naomi Shapiro, Assistant Regional Counsel
Office of Regional Counsel
Waste and Toxic Substances Branch
U.S. Environmental Protection Agency, Region 2
290 Broadway, 16th Floor
New York, New York 10007-1366

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Re: Ampacet Corporation
Docket No.TSCA-02-2009-9243

Dear Ms. Shapiro,

In reference to the above mentioned complaint, Ampacet Corporation requests an informal conference to clarify a number of questions concerning allegations in the complaint.

Item #8 We question Ampacet Corporation's qualification as the "importer" of all quantities of chemical substances listed in the complaint as we have subsequently discovered that some of our suppliers have reported some, if not all of the above-mentioned chemical substances via IUR as outlined in §710.55(b).

Item #12 We believe that Ampacet Corporation is exempt from this reporting requirement because we believe our product does not meet the definition of "mixture" and our manufacturing process does not result in the creation of a new chemical "substance".

Ampacet Corporation believes that other allegations in the complaint are answerable based on these two issues.

At the same time, we are also requesting a formal extension to the 30 day response period in order to properly file our answer to this complaint and notice, having collected necessary data from a variety of sources and suppliers within the U.S. and foreign countries.

Ampacet Corporation has a long history of complying with EPA regulations in order to protect the environment, our employees, and the community at large. We have faithfully complied with SARA Tier II and Form R reporting requirements since its inception. While we understand that ignorance of the law is no excuse, we were not aware of this Inventory Update Rule. Had we been aware of it, we would have investigated the requirements and sought answers to our questions during the reporting time period prescribed. We are fully committed to establishing a training program for our Environmental staff to ensure we stay up-to-date on this and other EPA regulations in the future.

Ampacet Corporation also has a history of upgrading existing facilities and building new facilities using current engineering and manufacturing controls to prevent contamination of air, land and water in each region of the United States and other countries where we operate, which can be verified by documentation of capital projects completed at various manufacturing sites over the years.

We would also like to review an upcoming project at one of our US facilities, which we believe would qualify as an acceptable SEP in consideration of reducing the penalty.

As this is our first offense, and based upon our history, we also respectfully question the severity of the proposed penalty and wish to discuss that with you as well.

We appreciate your time and attention to this matter, and await your response.

Sincerely Yours,



Robert A. DeFalco
President & CEO

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