

Appendix B

ERRATA Noted in Baugher's Declaration

In my review of Mr. Baugher's Declaration, I noted a few typographical errors. In my opinion, those typographical errors were minor reference and editing mistakes and would not change the opinions expressed by Mr. Baugher which I adopt. Below is a list of such errors (a strikethrough indicates deletion, while an underline indicates addition):

Para 24, Line 6-7. "Figures 1 and 2 are plot plans showing the refinery at the time it was purchased by Midland in 1943 and around the time it was sold to Hudson in 1977."

Para 30, Footnote 10. SPCC, July 10, ~~1977~~ 1974

Para 32, Line 4. Reference 15 "Staff Meeting Minutes, ~~EPAFPIA002377~~ EPAFOIA0002377."

Para 36 Line 8 Reference 22 "Preliminary Figures on Material Covered Under Paragraph -1.1, ~~LOL001409-92~~ LOL0014092-3, LOL0097910"

Para 38 Line 3 Reference 25 "Meeting of Management Staff Meeting, July 30, 1981, EPAFOIA0017113; Minutes of Refinery Staff Meeting, January 29, 198, ~~LOLEPAFOIA0022376~~"

Para 40 Line 12 Reference 28 "Fuqua memo, October 15, 1985, ~~FFR001003-1006~~"

Para 46 Line 5 Reference 35, "Hudson Staff Meeting Minutes, 1977-1982, EOAFO1A0017336-93, 0017112-19, 0017123-24, 0015912-16, 0016266-68, 0017130-38, 0017148-78, 0017404-07, 0017416-51, 0017497-526, 0017532-43, 0022363-85, 0022392- 422, 0022467-90, ~~LOL003804-08, 004249-51, 0088016-18, 0 088020-23, 0 088026-28, 0088030-33, 0076649-50, 0100585-86, 0088044-48, 0088051-52, 0404679-82, 0088134-37, 100676-79, 0088054-60, 0404674-76, 0404665-70, 0100673-75, 0404690-92, 0100607-09, 0104365-66, 0404658-62, 0100669-70, 0088068-70, 0156511-13, 0100659-62, 0404696-701, 0104315-16, 0100656-58, 0100663-65, 0404704-09, 0088080-81, 0088084-85, 0100649-51, 0404861-64, 0404799-800, 0404651-52, 0402829-32, 0404767-96, 0404761-63, 0404889-95, 0404753-60, 0404745-57, 0404871-85, 0404726-40, 0404719-25, 0404815-46, 0404900-02, 0254823-55"~~

Para 102 Line 10 "Prior to at least ~~1955~~ 1945 there were no containment dikes around these two tanks⁶⁰"

Para 102 Line 10 Reference 60 "Oil Insurance Association Inspection, ~~1955, EPAFOIA007909-910~~ 1945, EPAFOIA0001074-5"

Para 106, Line 11, Reference 68 "Staff Meeting Minutes, ~~EPAFPIA002377~~ EPAFOIA0022377"