

Attachment B

Copies of Disclosures and Relevant Correspondence

HOGAN & HARTSON

L.L.P.

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December 23, 2004

PRIVILEGED & CONFIDENTIAL SETTLEMENT COMMUNICATIONS

VIA ELECTRONIC TRANSMISSION AND REGULAR MAIL

Philip L. Milton
Multimedia Enforcement Division (2248A)
Office of Regulatory Enforcement
Office of Enforcement and Compliance Assurance
South Lobby Entrance
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

**Re: Verizon Wireless
Voluntary Disclosure of Potential EPCRA Violations**

Dear Phil:

I am writing to you on behalf of Cellco Partnership and its affiliates doing business as Verizon Wireless ("Verizon Wireless") pursuant to EPA's policy on "Incentives for Self-Policing: Discovery, Correction and Prevention of Violations" (65 Fed. Reg. 19618, April 11, 2000) (the "Policy") to disclose recently-discovered potential non-compliance with Sections 302, 311 and 312 of the Emergency Planning and Community Right-to-Know Act (EPCRA). There currently are 188 implicated facilities identified on Attachment 1 hereto.

This letter and its attachments contain information intended for use in settlement of claims EPA may have against Verizon Wireless regarding the potential violations disclosed herein, and as such this information constitutes privileged settlement communications and should be afforded the protections of such communications.

While we are disclosing the potential violations now in order to meet the 21-day reporting requirement of the Policy, we will need additional time to confirm the

Philip L. Milton
Office of Regulatory Enforcement
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facts and the number of sites that are implicated. The potential violations have been discovered through an active compliance management system covering over 21,000 wireless sites owned or operated by Verizon Wireless, and there is an on-going effort to verify the violations and determine whether some facilities have been mistakenly identified and whether others need to be included. Many of the sites have been identified because of relatively small exceedances of the reporting threshold for sulfuric acid in back-up power batteries. The calculation of the amount of sulfuric acid in the batteries is not always straightforward and requires confirmation.

We believe Verizon Wireless will need approximately 30 days to complete its evaluation and submit a final self-disclosure report of confirmed violations. I would appreciate confirmation from you that Verizon Wireless will have until January 22, 2005, to submit that report.

Verizon Wireless looks forward to working with you under the Policy to resolve the issues raised by these disclosures as quickly as possible. I request that this letter and all information contained with it be treated as confidential. If you have any questions or require additional information, please contact me.

Sincerely,



James T. Banks

Cc: Colleen Casey (via facsimile)
Rob Strobel, Esq. (via facsimile)

Date Reporting Triggered	Site name	Address	City	State	Sulfuric acid (lbs)	Section 301	Section 302	Section 303
10/1/2003	Blue Mountain	2805 Aaron	Anniston	AL	652			
11/12/2003	Hanceville	2715 CR 587	Hanceville	AL	1020			
2/15/2004	Rock Springs	Off Webster Chapel Road	Glencoe	AL	655			
6/18/2002	El Segundo	650 Sepulveda Boulevard	El Segundo	CA	549			
2/25/2003	Hotel Hollywood	5825 Sunset Boulevard	Hollywood	CA	547			
2/11/2004	Lancaster	1271 Avenue H	Lancaster	CA	515			
Jan-03	Magic Mountain Peak	11005 Santa Clara Truck Trail	Santa Clarita	CA	773			
	Mission Viejo Hospital	26691 Plaza Drive, Suite109	Mission Viejo	CA	634			
12/9/1999	Rosemead	9237 Lower Azusa Road	Temple City	CA	672			
3/6/2004	Stanford	1990 South Santa Cruz	Anaheim	CA	530			
	Stanton	11109 Brookhurst	Garden Grove	CA	528			
	Brentwood Bell South Corp.	18560 NW 27th Avenue	Opa Locka	FL	528			
5/1/2003	SpectrasiteHypoluxo	1801 Building G	Lantana	FL	527			
6/15/2003	WRBD Radio Tower	4431 Rock Island Road	Fort Lauderdale	FL	633			
11/2/2002	Dublin	613 Firetower Road	Dublins	GA	522			
11/1/2002	Snellville	2289 Scenic Drive	Snellville	GA	660			
7/2/2002	6 Mile & Farmington	32340 Six Mile	Livonia	MI	518			
10/10/2002	Airport North	27135 TROLLEY INDUS PLAZA	TAYLOR	MI	518			
4/2/2002	Algonac	622 COLUMBIA	ALGONAC	MI	511			
4/12/2001	Almont	315 Spring Street	Almont	MI	532			
5/1/2003	Anchorville	37209 28 MILE RD.	Lenox	MI	619			
10/14/2002	Ann Arbor II	4114 Morgan Rd	Ypsilanti	MI	518			
9/30/2002	Auburn Hills	3509 Auburn Rd.	Auburn Hills	MI	518			
10/23/2002	Bancroft	7071 SOUTH STATE ROAD	Bancroft	MI	532			
5/18/2001	Barton Hills	2206 North Maple	Ann Arbor	MI	518			
1/19/2004	Bay City North	1715 LEWIS ROAD	BAY CITY	MI	518			
5/23/2001	Bay City South	4611 Three Mile Rd.	Monitor Township	MI	518			
2/20/2003	Beltline North	533 LEFFINGWELL STREET	GRAND RAPIDS	MI	502			
8/3/2001	Bennington	3417 Bennington Road	Bennington Township	MI	533			
7/23/2000	Big Beaver & Adams	290 Strathmore	Bloomfield Twp.	MI	509			
5/29/2001	Birch Run	9103 E. BIRCH RUN ROAD	BIRCH RUN	MI	533			
6/2/2002	Birmingham Downtown	225 MERRILL STREET	BIRMINGHAM	MI	514			
12/23/1999	Bishop Airport	2470 Ballenger Rd.	Flint Twp.	MI	533			
5/1/1999	Bloomfield Hunt Club	1910 Stonycroft	Bloomfield Hills	MI	509			
6/1/1999	Brookfield	31500 Northwestern Hwy	Farmington Hills	MI	509			
11/13/2002	Cannonsburg	9921 Greenland	Rockford	MI	514			
4/2/2002	Capac	15525 Bryce	Capac	MI	533			
3/9/2001	Capital Airport	925 STANLEY STREET	LANSING	MI	518			
10/21/2003	Cedar Springs	3980 11 MILE ROAD	ROCKFORD	MI	554			
6/17/2002	CK College	2025 E. BELTLINE, STE 306	GRAND RAPIDS	MI	518			
5/21/2001	Clio	1445 HURD ROAD	VIENNA TOWNSHIP	MI	550			
7/18/2001	Cohoctah	14908 Pierce	Burns Township	MI	518			
10/22/2003	Coopersville	213 S. 48TH STREET	COOPERSVILLE	MI	554			
8/2/2002	Dalton	2591 Russell Rd	Muskegon	MI	533			
11/19/2002	Davison	5974 GENESSEE ROAD	LAPEER	MI	619			
4/2/2002	Davison & I-96	7751 W. DAVISON AVENUE	DETROIT	MI	502			
11/14/2002	Detroit West II	18454 GRAND RIVER AVENUE		MI	518			
6/1/2003	Dimondale	4780 GUNNELL	DIMONDALE	MI	518			
9/25/2003	Downtown Saginaw	930 South 13th/2000 Whittier	Saginaw	MI	518			
1/10/2002	Drake & 14 Mile	6811 Drake	West Bloomfield	MI	518			
10/27/2002	Dundee	16170 Pherdon Rd.	Dundee	MI	533			
6/28/2001	Durand II	9469 GOODALL ROAD	VERNON TOWNSHIP	MI	533			
8/16/2001	Egypt Valley	8441 2 MILE ROAD	Grand Rapids	MI	518			
10/7/2002	Elizabeth Lake	4641 Elizabeth Lake Road	Waterford	MI	518			
5/30/2001	Eureka & I275	36240-100 PENNSYLVANIA RD	ROMULUS	MI	518			
10/31/2002	Farmington Hills	33533 12 Mile Road	Farmington Hills	MI	514			
7/10/2003	Fenton	201 S FENWAY DRIVE	FENTON	MI	514			
11/21/2002	Flint West	4357 MILLER ROAD	FLINT	MI	518			
6/21/2001	Fosters	2000 E. TOWNLINE ROAD	BRIDGEPORT	MI	511			
6/18/2002	Fowler	10730 W. WALKER ROAD	FOWLER	MI	533			
11/1/2002	Fowlerville	706 E. VAN RIPE ROAD	FOWLERVILLE	MI	518			
8/14/2001	Frankenmuth	418 List Avenue	Frankenmuth	MI	518			
5/1/2001	Fruitport	5330 Sheridan	Fruitport	MI	511			
11/18/2002	Garfield	42106 GARFIELD	MT. CLEMENS	MI	514			
04/01/0001	Ginger Lake & I75	4880 Maybee Rd.	Independence Twp.	MI	514			
11/17/2002	Goodrich	7214 State Rd	Atlas Twp.	MI	530			
11/7/2002	Grand Blanc	4420 BALDWIN ROAD	GRAND BLANC	MI	600			
11/5/2002	Grand Blanc II	8166 Embury Road	Grand Blanc	MI	600			
10/23/2002	Grand Ledge	14301 S. GRANGE ROAD	EAGLE	MI	533			
10/20/2003	Grand Rapids North	3353 EAST BELTLINE AVENUE	GRAND RAPIDS	MI	518			
10/2/2002	Gratiot & McNichols	13948 Gratiot	Detroit	MI	518			
8/1/1999	Greenfield & 12 Mile	29097 Greenfield	Southfield	MI	509			
1/14/2002	Hamlin & Dequindre	1477 E. Hamlin Rd.	Rochester Hills	MI	518			
11/17/2002	Hamtramck	11669 Mt. Elliott	Detroit	MI	509			
12/18/2002	Holland	438 W. 29TH STREET	HOLLAND	MI	646			
9/22/2003	Holt	820 Conrad	Lansing	MI	518			
4/1/2001	Hudson Mills	7300 JOY RD	WEBSTER TOWNSH	MI	533			
1/16/2002	Hudsonville	5032 40TH AVENUE	HUDSONVILLE	MI	TBD			
4/10/2001	I69 & M24	411 LAKE NEPESSING ROAD	ELBA TWP	MI	550			
11/6/2002	I-75 & Davison	14655 DEQUINDRE	DETROIT	MI	523			

5/1/2003	I94 & I696	18179 SYCAMORE	ROSEVILLE	MI	533
8/2/2002	I94 MORANG	19430 HARPER	HARPER WOODS	MI	518
3/9/2001	I96 & I496	2202 Ena Dr.	Lansing	MI	518
11/6/2002	I-96 & Livernois	9583 GRAND RIVER AVENUE	DETROIT	MI	518
4/4/2001	Imlay	640 FIRST STREET	IMLAY CITY	MI	550
9/26/2002	Island Lake	11763 E. GRAND RIVER AVENUE	GREEN OAK TWP	MI	518
3/1/2001	Jefferson & Waterworks	330 VISTA AVENUE	DETROIT	MI	511
10/13/2002	Jenison	7044 12th	Georgetown Township	MI	518
3/11/2001	Laingsburg South	320 Railroad St.	City of Laingsburg	MI	532
5/1/2003	Lake Angelus	317 COLLIER ROAD	AUBURN HILLS	MI	518
4/30/2001	Lakeville	1446 ROCHESTER ROAD	ADDISON TWP	MI	532
8/2/2002	Lodge & Wyoming	15398 Wyoming	Detroit	MI	518
6/1/2003	Lowell	6096 HASTINGS ROAD	BOSTON TWP	MI	533
8/2/2002	M15 North	4335 N State Road	Davison	MI	533
8/2/2002	M46 & M52	180 N. Graham Rd	Saginaw	MI	533
11/1/2003	M59 & Rochester	3035 ROCHESTER ROAD	ROCHESTER HILLS	MI	509
5/10/2001	M59 & US23	878 OLD US 23	HARTLAND TWP	MI	533
4/25/2002	Marine City	6300 KING ROAD	MARINE CITY	MI	533
7/2/2003	Mason	3270 Harper Rd.	Mason	MI	518
4/11/2001	Memphis	78500 Wahl Rd.	Richmond Twp.	MI	533
4/12/2001	Metamora	726 Dryden Road	Metamora	MI	533
5/1/2001	Midland East	4604 James Savage	Midland	MI	518
11/3/2002	Milan	14666 SANFORD	MILAN	MI	533
2/25/2003	Millville	3985 COLUMBIA ROAD	DANSVILLE	MI	583
10/29/2002	Monroe South	15147 LAPLAISANCE ROAD	MONROE	MI	518
6/2/2002	Mt. Clemens East	38971 Jefferson Avenue	Harrison Twp.	MI	514
11/1/2002	Mt. Clemens North	264 Elizabeth	Mt. Clemens	MI	514
5/23/2001	Mt. Morris II	9094 DORT HIGHWAY	THETFORD TWP	MI	619
4/1/2001	Mt. Brighton	310 FRANKLIN STREET	BRIGHTON	MI	533
11/18/2002	New Boston	26155 WALTZ ROAD	NEW BOSTON	MI	533
10/29/2002	Newport	2349 Sigler Rd.	Carleton	MI	533
11/4/2002	North Maumee	2513 E. DEAN ROAD	ERIE TWP	MI	518
8/11/2001	Norton Shores	1121 SEMINOLE	NORTON SHORES	MI	533
11/1/2002	Oak Park	19978 JAMES COUZENS FRW	DETROIT	MI	509
11/1/2002	Oakwood	2908 Indianwood Trail	Lake Orion	MI	533
7/12/2004	Okemos	2379 CLUB MERIDIAN	OKEMOS	MI	518
10/17/2002	Orchard Lake	4600 Walnut Lake Rd.	West Bloomfield	MI	509
7/18/2000	Ortonville	594 S. Ortonville	Ortonville	MI	550
10/22/2002	Owosso	809 MIDDLETON ROAD	CALEDONIA	MI	533
10/1/2002	Petersburg	13840 LULU ROAD	IDA	MI	533
8/17/2001	Pigeon Hill	921 Pulaski Dr	Muskegon	MI	533
6/2/2002	Pinckney	1594 Patterson Lake Road	Pinckney	MI	533
4/1/2001	Plymouth	400 W PEARL ST	PLYMOUTH	MI	533
10/28/2002	Pontiac South	810 FEATHERSTONE ROAD	PONTIAC	MI	518
5/2/2002	Port Huron Downtown	332 Griswold	Port Huron Downtown	MI	533
10/21/2002	Portland	979 E GRAND RIVER TRAIL	PORTLAND	MI	533
1/1/2002	Portland Downtown	7679 E KNOX ROAD	PORTLAND	MI	533
5/1/2001	Rawsonville	10879 BLACKMORE	YPSILANTI TWP	MI	518
6/19/2003	Redford	23851 KELLER RD.	DETROIT	MI	509
11/1/2002	Rochester South	1790 LIVERNOIS ROAD, BLDG	ROCHESTER HILLS	MI	509
2/1/2002	Romeo	12497 34 Mile Rd.	Romeo	MI	533
5/4/2001	Romulus	28777 Eureka Rd., Suite 400	Romulus	MI	518
2/5/2003	Saginaw East	1963 26th Street	Buena Vista Twp.	MI	518
8/17/2001	Spring Lake	101 ROTARY STREET	SPRING LAKE	MI	511
4/3/2001	St. Clair	6777 Rattle Run Rd.	St. Clair	MI	588
4/2/2002	St. Clair Downtown	1554 Edison St.	St. Clair	MI	511
10/15/2003	St. Johns North	806 W. STATE STREET	ST. JOHNS	MI	533
6/1/1999	Taylor East	20202 Kinyon Ave	Taylor	MI	509
11/14/2002	Tiger Stadium	3575 VINEWOOD	DETROIT	MI	533
6/4/1999	Walton & Crooks	1468 Walton Road	Rochester	MI	509
6/14/2002	Waterford	5247 HUDSON ROAD	WATERFORD	MI	514
5/1/2001	WDIV II	15401 West 10 Mile	Oak Park	MI	533
10/16/2003	West 28th Street	3551 VIADUCT STREET	GRANDVILLE	MI	518
10/21/2002	West Lansing	3320 W MAIN STREET	LANSING	MI	518
10/20/2002	Williamston	228-B ELEVATOR STREET	WILLIAMSTON	MI	518
4/25/2001	Willis & US23	3503 Willis Rd	Yorktown Township	MI	511
2/20/2003	Wyoming	3647 LINDEN	WYOMING	MI	518
10/1/2001	Zeeland	9719 ADAMS ST	HOLLAND TOWNSHIP	MI	511
10/20/2004	East Grand Fork	EAST GRAND FORKS	SOUTH OF SEWAGE LAGOON #22	MN	662
	Gheen	Approx 300	Gheen	MN	754
	St Paul	643 E. 7TH STREET	St. Paul	MN	720
	Two Harbors	100 PORK CITY HILL	Two Harbors	MN	662
2/20/2004	Antire & 44th	202 Lewis Road	St. Louis	MO	508
3/15/2002	Dexter	County Road 413	Dexter	MO	700
8/2/2002	Perryville	230 FT S/O CORD 602 & 0.30 MIE/O CORD 604	Perryville	MO	508
8/1/2002	Poplar Bluff	745 FT N/O CORD 450 & CORD 465	Poplar Bluff	MO	508
4/1/2001	Proctor & Gamble	14785 Highway 177	Jackson	MO	508
8/1/2002	Sikeston II	317 N WEST ST	Sikeston	MO	508
1/15/2004	Warrenton	2.4 Miles NNW of Warrenton	Warrenton	MO	562
10/1/2002	Airport Drive	1730 Airport Drive	Great Falls	MT	578
11/10/2001	Talmadge	3705 SECOR RD	Toledo	OH	535
2/12/2004	Franklin	2130 Curd Lane	Franklin	TN	655

	Republic Center	633 Chestnut Street Suite 1400	Chattanooga	TN	918		
7/15/2003	Sugar Tree	780 Gossett Road	Sugar Tree	TN	587		
12/2/2002	April Sound	Hwy 105- McCaleb & Copeland	April Sound	TX	578		
8/1/2003	Ashbrook	5405 Ashbrook	Houston	TX	578		
8/23/2003	Ashford	1415A Wilcrest	Houston	TX	578		
6/1/2003	Astrodome	8686 Kirby	Houston	TX	578		
8/3/2003	Baytown	607 1/2 East James Street	Baytown	TX	578		
10/23/2003	Beechnut	8303 S.W. FWY #965	Houston	TX	578		
4/30/2003	BOBAIR	5327 FRY RD	KATY	TX	578		
2/24/2000	Broadway (HTX)	313 Hwy 146	LaPorte	TX	578		
6/15/2002	CAMPBELL	7150 BREEN DR	HOUSTON	TX	578		
4/1/2003	CLODINE(REV)	13210 GABY VIRBO DR	HOUSTON	TX	578		
3/13/2002	CONROE	1504 FM 2854	CONROE	TX	578		
6/16/2000	CYPRESS	15937 HOUSE RD	HOCKLEY	TX	578		
6/27/2003	FALLBROOK	11907A WINDFERN RD	HOUSTON	TX	578		
7/1/2003	FONDREN	7633 DASHWOOD DR	HOUSTON	TX	578		
8/1/2003	FRIENDSWOOD # 5	109 1/2 E WILLOWICK AVE	FRIENDSWOOD	TX	578		
2/2/2003	Gessner	1313 Cedar Post Lane	Houston	TX	634		
8/29/2003	GREENSPPOINT/ GREE	11811 NORTH FWY	HOUSTON	TX	578		
7/17/2002	HARLEY	1221 W 43RD ST	HOUSTON	TX	578		
4/1/2001	Humble	16011 Old Humble Road	Humble	TX	561		
5/1/2003	MANDELL	4212 1/2 MT VERNON ST	HOUSTON	TX	578		
8/1/2003	MASON	21702 HIGHLAND KNOLLS DR	Katy	TX	578		
11/1/2001	NORTH HOUSTON	12122 DULA	Cypress	TX	561		
1/7/2003	REVIELLE	5575 FM 1179	College Station	TX	578		
6/4/2003	WOODLANDS	2227 GOLDEN RD	THE WOODLANDS	TX	578		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

JAN 12 2005

Via Federal Express and Facsimile

James T. Banks
Hogan and Hartson, LLP
Columbia Square
555 Thirteenth Street, N.W.
Washington, DC 20004-1109

Re: Audit Policy Disclosure by Verizon Wireless

Dear Mr. Banks:

The United States Environmental Protection Agency ("EPA") is in receipt of your letter dated December 23, 2004, in which you disclose, on behalf of Verizon Wireless, possible non-compliance with reporting requirements under the Emergency Planning and Community Right-to-Know Act ("EPCRA"). EPA appreciates Verizon Wireless's willingness to self-police, disclose, and correct violations in a timely manner for its facilities. We encourage Verizon Wireless to consider evaluating its compliance under other environmental statutes as well.

In your December 23, 2004 letter, you stated that Verizon Wireless expects to complete its environmental compliance audit and submit a final self-disclosure report by January 22, 2005. We agree that Verizon Wireless's final self-disclosure report shall be submitted by January 22, 2005, or 30 days from the date of this letter, whichever is later. Should Verizon Wireless find that additional time is needed to complete the audit and submit the final report, please provide a written justification and request for an extension.

The Agency's Audit Policy requires that violations be corrected within 60 days of discovery. Should Verizon Wireless find that it requires additional time to complete the review of its facilities and complete any corrective action required, please let me know immediately.

While the Audit Policy requires companies to disclose within 21 days of finding potential violations, we recognize that a consolidated reporting framework is appropriate in this circumstance. The Agency's interpretive guidance document ("Audit Policy Interpretive Guidance," dated January 15, 1997) allows Verizon Wireless to submit a list of all facilities that Verizon intends to evaluate, instead of disclosing each violation within 21 days. Your letter of December 23, 2004 included an attachment listing facilities that have been implicated thus far by the compliance audit. We understand that the universe of facilities under review is much larger, (21,000 wireless sites); please provide us with a list of all facilities that are being evaluated as part of the Verizon Wireless audit within seven days of the date of this letter.

Condition 7 - No Repeat Violations

Condition 7 of the Audit Policy bars repeat offenders from receiving Audit Policy credit. Under the repeat violations exclusion, the same or a closely-related violation must not have occurred at the same facility within the past three years. The three-year period begins to run when the government or third party has given the violator notice of a specific violation, without regard to when the original violation cited in the notice actually occurred. When the facility is part of a multi-facility organization, Audit Policy relief is not available if the same or a closely-related violation occurred as part of a pattern of violations at one or more of these facilities within the past five years.¹ If a facility has been newly acquired, the existence of a violation prior to acquisition does not trigger the repeat violations exclusion.

On August 30, 2001, Cellco Partnership, doing business as Verizon Wireless, submitted a final report of an audit conducted on approximately 120 wireless communications towers. This final report disclosed violations of EPCRA at 110 facilities. A Final Order in this matter was issued by the Environmental Appeals Board (EAB) on December 3, 2001.

As part of Verizon Wireless's final audit report, please provide certification that none of the facilities evaluated as part of the August, 2001 self-disclosure are included as part of the current audit and self-disclosure.

Please also provide an explanation for why Condition 7 is not applicable to Verizon Wireless at this time.

Audit Policy Criteria

To determine whether Verizon Wireless has met the criteria in the Audit Policy, EPA will need additional factual information specific to each of the criteria in the Audit Policy. Verizon Wireless's final audit report should include all available factual information which addresses

¹The five year time period is considered to begin with the issuance of a Final Order by the Environmental Appeals Board (EAB) for a self-disclosure settlement.

conditions one through nine of the Audit Policy. To assist you in collecting the necessary data, enclosed is a copy of a questionnaire indicating the information needed by the Agency.

Facility Compliance

So that the Agency has complete information on the violations that may have occurred, we request detailed information on each facility's compliance record for each violation. Listed below is the type of the information that will be required .

EPCRA Reporting Requirements (You may submit the requested information in tabular form to facilitate your response and our review)

Facility name,
Facility type (if appropriate),
Facility address (street, city, state, zip code),
Date facility began operations,
Nature of potential violation(s) (e.g., failure to submit annually to the SERC, LEPC, and the fire department, a completed chemical inventory form (as required by EPCRA §312)),
Dates of possible non-compliance (e.g., March 1, 1991 - present),
Chemical(s) involved,
Quantity of materials (lbs.),
Date audit team discovered possible noncompliance,
Date EPA notified of possible noncompliance,
Date facility returned to compliance,
Actions taken to return to compliance (e.g., Tier II form submitted to LEPC, SERC, and fire department).

Actions taken to return to compliance (e.g., submission of permit application/exemption request to appropriate regulatory agency)

Cost of Compliance (You may submit the requested information in tabular form to facilitate your response and our review)

For each facility, determine the cost to return to compliance. Such costs should include internal staff or outside consultants' time to become familiar with the regulations, determining which chemicals meet/exceed reporting thresholds, preparing forms/plans, submitting forms to appropriate agencies, fees collected by state or other regulatory agencies, release detection equipment, and secondary containment or start-up costs for plan implementation or tank monitoring.

After we have received your response, we will determine the specific violations which occurred, a proposed penalty, and whether the Audit Policy applies. It is our goal to attempt to resolve this matter as expeditiously as possible with your cooperation.

Again, EPA appreciates Verizon Wireless's willingness to self-police, disclose, and correct potential violations at its facilities. David Abdalla and I will serve as your primary points of contact for this matter. If you have any questions, please contact me at (202) 564-3271 or David at (202) 564-2413.

Sincerely,



Beth Cavalier
Analyst,
Special Litigation and Projects Division (2248A)
Office of Regulatory Enforcement

Enclosure

cc: David Abdalla, Esq.

SELF-DISCLOSURE QUESTIONNAIRE

Provide the following information for each potential violation at all of the facilities disclosed by Verizon Wireless. Please correlate each answer to the specific violation.

1. Describe the violation and state the specific regulatory or statutory provision violated.
2. Explain how the violation was discovered. Please be as detailed as possible.
3. State whether the violation of a federal, state, or local regulation was discovered by means of a systematic, internal, environmental audit or through a compliance management system ("CMS").

If Verizon Wireless believes that the violation was discovered through "CMS," as defined in EPA's Audit Policy, explain, in detail, how the company's practices and procedures leading to the discovery of the violation reflect the due diligence criteria defined in Section B of the Policy statement.

If the violation was discovered by means of an environmental audit, provide the following information:

- A. State the date(s) on which the environmental audit or systematic procedure or practice that identified the violation was being conducted.
- B. State the frequency of environmental audits of the Verizon Wireless facilities involved. State the date(s) on which the last environmental audit was conducted at each facility prior to your disclosure.
- C. State whether the facilities have a written policy or directive to follow up on audit findings to correct identified problems and prevent their recurrence.

Provide the Special Litigation and Projects Division (SLPD) with a copy of this written policy or directive.

- D. Describe the relationship between the involved facilities and the person(s) responsible for conducting environmental audits. Explain how Verizon Wireless ensures the auditor's tasks or inquiries are carried out in an objective and unobstructed manner. Include in your answer a discussion of the manner in which personnel, financial, or other potential conflicts of interest are avoided between employees of the facility and the individuals conducting an audit.

- E. Provide a copy of written audit policies and procedures for the facility. The requested policies and procedures should indicate the scope of the audit, the process for examining audit findings, the protocol for communicating audit results to Verizon Wireless management, auditor conflict of interest policy, auditor education and training requirements, and follow-up measures.
4. Was the violation identified through an activity which Verizon Wireless was legally required to perform, such as under a State or Federal statute, regulation or permit, or under the terms of a judicial or administrative order or consent agreement? If so, identify the authority under which the activity was required.
 5. Is the violation required to be reported under any Federal or State statute, regulation or permit? If so, identify each such statute, regulation or permit.
 6. State the date on which the violation was discovered. If Verizon Wireless believed additional analysis or information was needed after the audit/systematic procedure or practice to determine whether a violation existed, state the reasons for the additional analysis.
 7. If disclosure of the violation was not within 21 days of the date of discovery, or such shorter period as may be provided by law, please explain, in detail, the reasons that the violation was not disclosed within 21 days of discovery.
 8. Identify the name, title, and employer of each individual who discovered the violation.
 9. If the violation was discovered by an independent auditor, (that is, by a person not employed by Verizon Wireless), provide the date and the manner in which Verizon Wireless was made aware of the violation.
 10. Explain in detail all measures taken to correct or remediate the violation. Provide an estimate of the length of time it took or will take to complete these measures. If Verizon Wireless estimates that more than 60 days will be needed to correct the violation, please explain fully and provide the opinion of any technical or engineering expert relied upon to arrive at that estimate.
 11. Explain in detail all measures taken or to be taken to ensure that the violation disclosed will not be repeated. Include in your discussion any improvements made to Verizon Wireless's environmental auditing or CMS efforts in an attempt to prevent recurrence of the violation.
 12. Did the violation result in any serious actual harm to human health or the environment? Provide a full explanation of how this conclusion was reached.

13. Did the violation present or may it present, any form of endangerment to public health or the environment? Provide a full explanation of how this conclusion was reached.
14. Did the violation violate the specific terms of a judicial or administrative order or consent agreement? If so, please identify the order or agreement.

HOGAN & HARTSON
L.L.P.

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February 14, 2005

Confidential Settlement Communication

VIA ELECTRONICALLY AND FIRST CLASS MAIL

Ms. Beth Cavalier, Analyst
Special Litigation and Projects Division (2248A)
Office of Regulatory Enforcement
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Audit Policy Disclosure by Verizon Wireless

Dear Ms. Cavalier:

I am writing to you on behalf of Celco Partnership and its affiliates doing business as Verizon Wireless in connection with the Company's December 23, 2004 Audit Policy Disclosure. This letter and its attachments address the items remaining open from your January 12, 2005 letter to me:

1. Compliance report, including information on the cost of compliance, is found in Attachment A hereto; and
2. Certification that none of the facilities evaluated as part of the August 2001 self-disclosure are included as part of the current self-disclosure is Attachment B hereto.

While most of the facility-specific information requested on page 3 of your January 12, 2005 letter to me is set forth in tabular form in Attachment A, there are several exceptions. Facility type is not indicated; these facilities primarily are cell sites or switches. Instead of providing the date on which a facility began operations, the Company has provided the "Date Triggering EPCRA Reportability." This is the date on which the amount of a chemical is known to have increased (e.g.

Ms. Beth Cavalier
U.S. Environmental Protection Agency
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by the addition of batteries) such that EPCRA compliance responsibility began. In lieu of providing dates of possible non-compliance, the Company has provided the "Total Reporting Years ("RYs") Without Inventories." As to the date a facility returned to compliance, we have indicated that all current and historical filings will be made no later than March 1, 2005, as approved by your office via email correspondence dated January 31, 2005 (see Attachment A, footnote 3). Finally, the actions taken to return to compliance will be the submission of all filings for prior years and the payment of appropriate fees. The amount of fees will not be known for some jurisdictions until filings are completed, as the standard practice for these jurisdictions is to invoice the filer after receipt of a report.

We note that the cost estimates provided in Attachment A should be regarded as delayed costs rather than avoided costs in EPA's calculation of the economic benefit of non-compliance. In the course of performing its compliance evaluation and correcting the violations identified in that evaluation, Verizon Wireless actually will incur each of these costs. As noted above, all forms will be prepared and submitted for prior reporting years, together with the appropriate fees. Threshold reporting determinations are not an annually recurring cost, as the Company's EMIS performs this function automatically based upon inputs that change infrequently (e.g. battery string additions or changes).

We have not estimated a cost of becoming familiar with regulations because Verizon Wireless personnel responsible for environmental compliance were familiar with the regulations and had provided procedures, training and a database to field personnel in order to have those personnel provide information to the environmental staff for a compliance determination. There was no need for the environmental staff to become familiar with the regulations.

With regard to the facilities identified as having violations on Attachment A, please note that the vast majority of the facilities are clustered in four distinct regions for Verizon Wireless: Michigan, Illinois/Wisconsin, Texas and Southern California. Absent the violations in these regions, the Company would be reporting violations at only 87 of its over 21,000 sites. Obviously, this begs the question of what went wrong in the four regions. The Company is actively investigating each situation, and will address any programmatic shortcomings it identifies.

In the meantime, the Company has initiated the measures to prevent recurrence as outlined in my January 26, 2005 letter to you: certifications will be required annually regarding timely and accurately updating of the Company's environmental management information system ("EMIS"); corporate environmental counsel is participating in a series of calls with the regions to emphasize the

Ms. Beth Cavalier
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importance of updating EMIS; reports will be run monthly to determine whether each region is actively using EMIS, and during bi-monthly calls with the regions they will be requested to confirm that all field changes have been added to EMIS. In addition, since the date of my letter, and as a result of the Company's preliminary investigation, the company has initiated an effort to clarify roles and responsibilities with regard to updating EMIS so as to increase personal accountability for compliance.

Thank you for your continued attention to this matter. I will call you to see if you have any questions or require any additional information.

Sincerely,


James T. Banks

Cc: Colleen Casey (via email)
Robert O. Strobel, Esq. (via email)
David Abdalla, Esq.

ATTACHMENT A

COMPLIANCE REPORT ON FOLLOWING PAGES

EPCRA-REPORTABLE SITES

Count	Facility Name	Address	City	State	Zip	Date Triggering EPCRA Reportability	EPCRA Reportable Chemicals	EPCRA-Reportable Chemical Quantity (lbs)	Date Noncompliance Confirmed	Submission Date of Outstanding Filings	Section 311	Section 312	Section 302	Total RYs without Inventories	One Time Cost	Total of Annual Costs
1	Blue Mountain	2605 Aaron	Anniston	AL	36201	10/1/2003	Sulfuric Acid	652	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
2	Dothan MTSO	510 N Cherry St	Dothan	AL		12/1/2002	Sulfuric Acid, Diesel, Lead	2892, 18125, 26400	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
3	Hanceville	2715 CR 587	Hanceville	AL		11/12/2003	Sulfuric Acid	1020	12/3/2004	Before 3/1/05	X	X	X	1	\$23.00	\$ 19.50
4	Phenix City	43 Womack Road	Phenix City	AL		5/13/2004	Sulfuric Acid	612	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
5	Rock Springs	Off Wheeler Chapel Road	Glencoe	AL	35905	2/15/2004	Sulfuric Acid	655	12/3/2004	Before 3/1/05	X	X		0	\$23.00	\$ -
6	Parker Hub	3710 W. E. of California St. & Shea Rd.	Parker	AZ		6/10/2000	Sulfuric Acid	1148	See Footnote 1	Before 3/1/05	X	X	X	4	\$23.00	\$ 78.00
7	Ascot	18720 South Normandie Ave., Unit B	Gardena	CA		6/30/2003	Sulfuric Acid	530	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
8	Atolia	Hwy 395-Section 18, T30S, R41E	Atolia	CA		5/12/2004	Sulfuric Acid	502	See Footnote 1	Before 3/1/05	X			0	\$23.00	\$ -
9	Barrington	Floor	Los Angeles	CA		10/20/2004	Sulfuric Acid	513	See Footnote 1	Before 3/1/05	X			0	\$23.00	\$ -
10	Baños	7130 Avenida Encinas, #106	Carrizo	CA		11/3/2004	Sulfuric Acid	523	See Footnote 1	Before 3/1/05	X			0	\$23.00	\$ -
11	Belvedere	4527 Cesar Chavez Ave.	Los Angeles	CA		6/24/2002	Sulfuric Acid	569	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
12	Brazill Street	4600 Brazill Street	Los Angeles	CA		6/1/2002	Sulfuric Acid	518	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
13	Carmel Point	15050 Ave. of Sciences, #101	San Diego	CA		8/1/2003	Sulfuric Acid	523	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
14	Casa De Oro	3902 Kenwood Dr. A	Spring Valley	CA		11/3/2003	Sulfuric Acid	504	See Footnote 1	Before 3/1/05	X	X		4	\$23.00	\$ 78.00
15	Castro Peak Hub	1953 Lalligo Canyon Rd.	Malibu	CA		1/1/2000	Sulfuric Acid	619	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
16	Cerritos	6907 Marlin Circle	La Palma	CA		2/24/2004	Sulfuric Acid	523	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
17	Chino 2	12061 Pipeline Ave	Chino	CA		10/28/2003	Sulfuric Acid	539	See Footnote 1	Before 3/1/05	X	X		4	\$23.00	\$ 78.00
18	Coachella	38155 Monroe St.	Indio	CA		11/7/2003	Sulfuric Acid	514	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
19	Colton Hub	600 West Linton Ave.	Colton	CA		11/7/2003	Sulfuric Acid	671	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
20	Costa Mesa Hub	9275 West 18th St.	Costa Mesa	CA		10/16/2003	Sulfuric Acid	544	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
21	Crazy Horse	2210 South Ritchey St.	Santa Ana	CA		2/14/2002	Sulfuric Acid	545	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
22	Crenshaw	2345 Crenshaw Boulevard	Los Angeles	CA		4/28/2003	Sulfuric Acid	538	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
23	Cucamonga	9272 Hyssop Dr.	Cucamonga	CA		8/28/2003, 7/20/04	Sulfuric Acid	520	See Footnote 1	Before 3/1/05	X	X		4	\$23.00	\$ 78.00
24	El Monte	1431 North Central	South El Monte	CA		9/30/2004	Sulfuric Acid	551	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
25	El Segundo	650 Sepulveda Boulevard	El Segundo	CA	90245	6/18/2002	Sulfuric Acid	549	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
26	Fallbrook, SD	3490 East Mission Rd.	Fallbrook	CA		5/5/2003	Sulfuric Acid	654	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
27	Farm Country	14782 Schlemmer	Corona	CA		8/14/2003	Sulfuric Acid	518	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
28	Five Points	9210 Whitmore St.	El Monte	CA		4/14/2003	Sulfuric Acid	530	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
29	Fontana	17173 Valley Blvd.	Fontana	CA		1/30/2003	Sulfuric Acid	523	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
30	Hotel Hollywood	5825 Sunset Boulevard	Hollywood	CA	90028	2/25/2003	Sulfuric Acid	547	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
31	Inglewood	Unit 8	Inglewood	CA		5/30/2003	Sulfuric Acid	514	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
32	Inwindale	1442 Arrow Highway, Unit P	Inwindale	CA		2/16/2004	Sulfuric Acid	523	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
33	Island	537 North Figueroa	Wilmington	CA		1/12/2000	Sulfuric Acid	530	See Footnote 1	Before 3/1/05	X	X		4	\$23.00	\$ 78.00
34	Jeronimo	25017 172 Whisler Drive	Lake Forest	CA		2/15/2002	Sulfuric Acid	530	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
35	Lancaster	1271 Avenue H	Lancaster	CA		2/11/2004	Sulfuric Acid	515	12/3/2004	Before 3/1/05	X	X		0	\$23.00	\$ -
36	Las Bolsas	12912 Brookhurst St., Suite 270	Garden Grove	CA		1/12/2000	Sulfuric Acid	512	See Footnote 1	Before 3/1/05	X	X		4	\$23.00	\$ 78.00
37	Lincoln Village	2045 East Carson St.	Carson	CA		12/23/2003	Sulfuric Acid	530	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
38	Magic Mountain Peak	11005 Santa Clara Truck Trail	Santa Clara	CA	91321	1/1/2003	Sulfuric Acid	773	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
39	Mailbu Civic Center	23555 Civic Center Way	Mailbu	CA		4/17/2004	Sulfuric Acid	514	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
40	MacKinley	2185 Sampson, Unit 101A	Corona	CA		1/20/2003	Sulfuric Acid	504	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
41	Mission Valley	581 Camino De La Reina	San Diego	CA		4/28/2003	Sulfuric Acid	614	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
42	Mission Viejo	26691 Plaza Drive, Suite 109	Mission Viejo	CA	92692	2/19/2001	Sulfuric Acid	634	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
43	Nerco Hub	1840 Lampton Lane	Nerco	CA		2/19/2003	Sulfuric Acid	694	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
44	Pacific	13119-1357 West Garvey	West Covina	CA		4/25/02	Sulfuric Acid	528	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00

EPCRA-REPORTABLE SITES

Count	Facility Name	Address	City	State	Zip	Date Triggering EPCRA-Reportability	EPCRA Reportable Chemicals	EPCRA-Reportable Chemical Quantity (lbs)	Date Noncompliance Confirmed ¹	Submission Date of Outstanding Filings ²	Section 311	Section 312	Section 302	Total RVE without Inventories	One Time Cost	Total of Annual Costs
45	Palmdale Hub	Tenhi Mtn (APN 3054-25-30)	Palmdale	CA	91364	6/12/2003	Sulfuric Acid	507	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
46	Pomona	732 Indigo Court	Pomona	CA	91768	1/14/2003	Sulfuric Acid	640	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
47	Redondo Beach	700 Diamond St.	Redondo Beach	CA	90280	12/30/2003	Sulfuric Acid	503	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
48	Riverside Junction	2200 East La California Dr.	Riverside	CA	92503	8/5/2003	Sulfuric Acid	519	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
49	Rosemead	4927 Lower Azusa Road	Tempe City	CA	91780	12/31/1999	Sulfuric Acid	672	12/3/2004	Before 3/1/05	X	X		5	\$23.00	\$ 97.50
50	San Dimas	919 West Gladstone Ave.	San Dimas	CA	91773	11/7/2003	Sulfuric Acid	535	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
51	Capistrano	27174 Ortega Highway	Capistrano	CA	91714	1/1/2000	Sulfuric Acid	523	See Footnote 1	Before 3/1/05	X	X		4	\$23.00	\$ 78.00
52	Sepulveda 2	16000 Mulholland Drive	Los Angeles	CA	90044	9/4/2003	Sulfuric Acid	523	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
53	Stanton	1990 South Santa Cruz	Anaheim	CA	92805	3/6/2004	Sulfuric Acid	530	12/3/2004	Before 3/1/05	X	X		0	\$23.00	\$ -
54	Stanton	11109 Brockhurst	Garden Grove	CA	92840	3/1/2004	Sulfuric Acid	528	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
55	Sun City	Bell Mountain	Sun City	CA	92720	3/21/2003	Sulfuric Acid	646	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
56	UCI	4364 Bonnie Canyon	Irvine	CA	92714	7/10/2003	Sulfuric Acid	514	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
57	UTC	9191 Towns Centre Dr.	Irvine	CA	92618	1/19/2004	Sulfuric Acid	523	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
58	Venice	4090 Del Rey Avenue	Venice	CA	90290	4/30/2002	Sulfuric Acid	710	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
59	Venue Park	1000 South Ventu Park Rd.	Newbury Park	CA	91325	8/25/2003	Sulfuric Acid	529	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
60	Via Verde	1790 South San Dimas Ave.	San Dimas	CA	91773	5/8/2003	Sulfuric Acid	504	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
61	Victorville Hub	17232 Oro Grande Peak Road	Victorville	CA	92392	1/29/2003	Sulfuric Acid	663	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
62	Villa Park	1938 East Katiella Ave.	Orange	CA	71403	7/24/03	Sulfuric Acid	530	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
63	Watson Junction	6300 Quary Avenue	Wilmington	CA	90744	12/31/2003	Sulfuric Acid	530	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
64	Willowbrook	2630 East 124th Street	Compton	CA	90226	6/28/2002	Sulfuric Acid	542	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
65	Windsford	8621 Bellanca Ave., Suite 102	Los Angeles	CA	90045	5/3/2003	Sulfuric Acid	530	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
66	Woodcrest	16380 Van Buren Blvd.	Riverside	CA	92504	7/15/2002	Sulfuric Acid	514	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
67	Reservoir Bell South Corp. Feather Sound Corporate Park	4759 Reservoir Road	Washington DC	DC	20004	8/1/2003	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
68	Reservoir Bell South Corp. Feather Sound Corporate Park	18590 NW 27th Avenue	Opa Locka	FL	33066	3/1/2001	Sulfuric Acid	526	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 69.00
69	Fontana Hall	13577 Feather Sound Dr. Bldg. 2	Cleanwater	FL	33914	3/10/2004	Sulfuric Acid	533	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
70	OIA Terminal A	4200 East Blatcher Ave.	Tampa	FL	33611	5/22/2003	Sulfuric Acid	533	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
71	OIA Terminal B	9200 Airport Blvd.	Orlando	FL	32827	10/9/2002	Sulfuric Acid	533	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
72	Specrasitehypolux	8407 Airport Blvd.	Orlando	FL	32827	10/9/2002	Sulfuric Acid	533	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
73	WREB Radio Tower	1601 Building G	Lantana	FL	33462	5/1/2003	Sulfuric Acid	527	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
74	WREB Radio Tower	4431 Rock Island Road	Fort Lauderdale	FL	33319	6/15/2003	Sulfuric Acid	633	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
75	Alpharetta MTSO	10300 Old Alabama Connector	Alpharetta	GA	30201	10/31/2003	Sulfuric Acid, Diesel, Lead	6480, 72600, 69264	See Footnote 1	Before 3/1/05	X (diesel, lead, H2SO4)	X		1	\$23.00	\$ 19.50
76	Dublin	613 Finowen Road	Dublin	GA	31021	11/2/2002	Sulfuric Acid	522	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
77	Lithonia	7132 Maddox Road	Lithonia	GA	30058	1/29/2002	Sulfuric Acid	528	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
78	Snellville	2289 Scenic Drive	Snellville	GA	30078	11/1/2002	Sulfuric Acid	660	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
79	TCI Warehouse	1295 Progress Industrial Blvd.	Lawrenceville	GA	30046	2/1/2004	Sulfuric Acid, Lead	3149, 11685	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
80	Wack	2701 Burton Road NW	Atlanta	GA	30328	6/25/2002	Sulfuric Acid	760	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
81	WATX	5656 Light Street	Columbus	GA	31906	12/15/2002	Sulfuric Acid	505	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
82	Lowden	2130 142nd Street	Lowden	IA	50152	12/1/1998	Sulfuric Acid	544	See Footnote 1	Before 3/1/05	X	X		6	\$23.00	\$ 117.00
83	Muscataine	312 East 5th St.	Muscataine	IA	50152	12/30/1998	Sulfuric Acid	508	See Footnote 1	Before 3/1/05	X	X		6	\$23.00	\$ 198.00

EPCRA-REPORTABLE SITES

Count	Facility Name	Address	City	State	Zip	Date Triggering EPCRA Reportability	EPCRA Reportable Chemicals	EPCRA-Reportable Chemical Quantity (lbs)	Data Non-compliance Confirmed	Submission Date of Outstanding Filings	Section 311	Section 312	Section 302	Total RYs without Inventories	One Time Cost	Total of Annual Costs
84	Otter Creek	17935 167th Ave.	Maxquokwa	IA		12/30/1989	Sulfuric Acid	508	See Footnote 1	Before 3/1/05	X	X		5	\$23.00	\$ 97.50
85	Algonquin	2120 Rt. 25	Algonquin	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
86	Aurora Pump	2301 Liberty	Aurora	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
87	Batavia	Rte 1 - 2700 County Line Farm	Aurora	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
88	Bloomington II	159 W. Lake St.	Bloomington	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
89	Bradley	359 S. Kinzie	Bradley	IL		10/12/2003	Sulfuric Acid	1258	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
90	Broadview	2300 S. 25th Ave.	Broadview	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
91	California	2814 N. California	Chicago	IL		3/1/2004	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
92	Camelot Towers	1415 E. State Street	Rockford	IL		11/12/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
93	CANOE CREEK	29400 RTE 2 NORTH	Hillsdale	IL		11/11/1994	Sulfuric Acid	508	See Footnote 1	Before 3/1/05	X	X		10	\$23.00	\$ 195.00
94	Chain of Lakes	11006 Wilmont Road	Spring Grove	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
95	CHI LOOP	750 SOUTH DEP PLAINES	CHICAGO	IL		4/7/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
96	Decatur	1991 N. Elizabeth	Decatur	IL		7/15/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
97	Decatur	7480 S. Main Rd.	Decatur	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
98	Downtown Elgin	222 Locust St.	Elgin	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
99	Downtown Skokie	8524 Skokie Rd.	Skokie	IL		11/32/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
100	DT CHAMPAIGN II	504 SOUTH NEIL STREET	CHAMPAIGN	IL		7/12/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
101	DT OSWEGO	340 S. Madison Street	Oswego	IL		11/72/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
102	DT PARIS (2001)	228 N. CENTRAL AVE	PARIS	IL		3/15/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
103	DT Urbana	201 E. Main	Urbana	IL		7/15/2001	Sulfuric Acid	668	See Footnote 1	Before 3/1/05	X	X		3	\$23.00	\$ 68.50
104	Edwardsville	Ridgeview Rd., Route 4	Edwardsville	IL		14/2004	Sulfuric Acid	562	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
105	Effingham Rolo	14458 E. 1600 Avenue	Effingham	IL		2/27/2004	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
106	ERU	2320 WOODFALL RD	CHARLESTON	IL		4/1/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
107	ERIE IL	9822 FROG POND RD	ERIE	IL		12/11/1993	Sulfuric Acid	579	See Footnote 1	Before 3/1/05	X	X		11	\$23.00	\$ 214.50
108	FAIRFIELD															
109	FAIRFIELD															
110	Fox Lake Water Tower	24280 W. Hwy 60	Grayslake	IL		12/11/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
111	Franklin Park	30 Ernest Ave.	Fox Lake	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
112	Franklin Park II	9501 W. Belmont	Franklin Park	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
113	Freeport	10525 W. Waveland	Franklin Park	IL		12/12/2003	Sulfuric Acid	943	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
114	Funhouser	2987 N. Henderson	Freeport	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
115	Gage Park	10989 East 12600th	Effingham	IL		3/16/2004	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
116	Geneva	3245 W. 59th St.	Chicago	IL		10/22/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
117	Glenview	1900 South St.	Geneva	IL		12/22/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
118	Grand & Ohio	2600 Geff Rd.-Talsman Tower	Glenview	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
119	Green Oaks	211 E. Ohio	Glenview	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
120	Greenwood	14121 Highway 176 (Rockland I	Lake Bluff	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
121	Hampshire	5402 N. Rl. 47	Woodstock	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
122	Hoffman Estates 3	Parcel # 2 Harmony Road	Hampshire	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
123	Holcomb	4690 Oimsted Dr.	Hoffman Estates	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
124	Homewood	11538 E. Holcomb Rd.	Davis Junction	IL		12/30/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
125	I 55 AND RT 113	17755 South Ashland Ave.	Homewood	IL		12/12/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
126	IRVING PARK & MEACHAM	8655 SOUTH COSTER	Gardner	IL		8/2/2001	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
127	Kimmunity	181050 63RD ST	BURR RIDGE	IL		11/22/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
128	Kirkland	21 W. 750 Irving Park Road	Medinah	IL		5/5/2004	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
129	LAKE SUMMERSET	5973 Robb Road	Kimmunity	IL		3/1/2001	Sulfuric Acid	590	See Footnote 1	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
130	LAKE VILLA	30911 Aull Rd.	Kirkland	IL		12/30/1994	Sulfuric Acid	703	See Footnote 1	Before 3/1/05	X	X		10	\$23.00	\$ 195.00
131	LAKE VILLA	9814 PIPER ROAD	DAVIS	IL		12/11/1997	Sulfuric Acid	508	See Footnote 1	Before 3/1/05	X	X		7	\$23.00	\$ 136.50
132	LAKE VILLA	1510 CEDAR LAKE RD.	LAKE VILLA	IL		12/32/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
133	LEHIGH	4356 W. RT. 17	KANKAKEE	IL		10/92/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
134	LOWE ROAD	7754 ELEVATOR RD	ROSCOE	IL		12/11/1994	Sulfuric Acid	508	See Footnote 1	Before 3/1/05	X	X		10	\$23.00	\$ 195.00
135	MALCOLM X	2120 W. Van Buren St.	Chicago	IL		12/11/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50

EPCRA-REPORTABLE SITES

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134	Marquette Pk	7440 S. Western Ave.	Chicago	IL		8/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
135	Matteson	4210 W. 204th Street	Matteson	IL		8/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
136	Mitchell Road	7664 MITCHELL ROAD	Roscoe	IL		12/30/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 38.00
137	MOSSVILLE ROAD	11825 N. Route 40	Dunlap	IL		2/12/01	Sulfuric Acid	590	See Footnote 1	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
138	N.E. Loop	900 N. Dewitt	Chicago	IL		11/29/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
139	Naperville Holiday Inn	1801 N. Napier Blvd.	Naperville	IL		11/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
140	Naperville South	1802 S. Washington St. # 104	Naperville	IL		9/6/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
141	NAVY PIER (M)	800 EAST GRAND AVE	CHICAGO	IL		6/13/2004	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
142	NE Decatur	1551 McBride St.	Decatur	IL		7/15/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 38.00
143	NEW BUILD - WU	SITE SEARCH	MACOMB	IL		7/14/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
144	Normal	2 MILES NORTHWEST OF NO	Normal	IL		7/15/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 38.00
145	North Barrington	24664 Miller Rd.	Barrington	IL		11/25/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
146	BLOOMINGTON NORTH SHORE	814 L.A.A. Drive	Bloomington	IL		8/12/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 38.00
147	TOWING RELO	SITE SEARCH	CHICAGO	IL		11/30/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
148	Oakley	8048 Angola Crossing Road	Oakley	IL		3/2/2003	Sulfuric Acid	590	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 38.00
149	Old Mill Creek	39714 Mill Creek Rd.	Wadsworth	IL		10/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
150	Owens Creek	3782 State Road 54	Clare	IL		12/30/2002	Sulfuric Acid	590	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 38.00
151	Tower	Smith Street Tank	Palatine	IL		11/30/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
152	PEPSI	SOUTH U.S. ROUTE 52	PANA	IL		8/12/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 38.00
153	PEPSI	3501 Apponquin Rd.	Rolling Meadows	IL		4/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
154	Plato	429W373 Plato Rd.	Elgin	IL		4/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
155	PLOTE	1100 Brandt Dr.	Hoffman Estates	IL		12/20/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
156	POLO	3424 S. GALENA TRAIL	POLO	IL		12/30/1997	Sulfuric Acid	598	See Footnote 1	Before 3/1/05	X	X		7	\$23.00	\$ 136.50
157	PRIME (RELO)	SITE SEARCH	Oak Brook Terrace	IL		5/4/2004	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
158	Pulaski	4017 W. Armitage	Chicago	IL		12/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
159	PULASKI/183 (2001)	3880 W. 183RD ST	HOMEWOOD	IL		9/5/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
160	R23 & I-90	11506 COON CREEK RD	Marengo	IL		10/5/1995	Sulfuric Acid	503	See Footnote 1	Before 3/1/05	X	X		9	\$23.00	\$ 175.50
161	RAMSEY	4000 E OF CTY RD 100 & 2800	RAMSEY	IL		11/29/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 38.00
162	Ridgfield	8711 Ridgfield Rd.	Crystal Lake	IL		11/19/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
163	ROCHESTER	4520 Maschmer Road	Rochester	IL		8/15/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 38.00
164	Rolling Meadows II ROSELLE/CHI-FFF-	2455 W. Plum Grove Rd.	Rolling Meadows	IL		12/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
165	Rosemont	1478 N ROSELLE RD	SCHAUMBURG	IL		12/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
166	RT 120 & CHAPEL	9650 Foster Ave	Rosemont	IL		12/15/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
167	HILL	1803 W HIGHWAY 120	MCHENRY	IL		11/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
168	RU 53 & Rand	1120 Frontage Rd.	Palatine	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
169	RUSSELL RD - Schaumburg	16210 RUSSELL RD	ZION TOWNSHIP	IL		3/11/1997	Sulfuric Acid	587	See Footnote 1	Before 3/1/05	X	X		7	\$23.00	\$ 136.50
170	Schaumburg Post	50 N. Martingale Rd.	Schaumburg	IL		10/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
171	Schaumburg Post	450 W. Schaumburg Rd.	Schaumburg	IL		12/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
172	Shiloh	4126 Lebanon Rd.	Belleville	IL		2/20/2004	Sulfuric Acid	562	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
173	Sockton	785 N. Park Rd.	Stockton	IL		12/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
174	SOLDIER FIELD	1712 S.PRAIRIE	CHICAGO	IL		4/3/2003	Sulfuric Acid	943	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
175	SOLDIER FIELD 2	1712B S PRAIRIE	CHICAGO	IL		4/20/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
176	South Canton	23989 N. IL 78 Hwy.	Canton	IL		11/12/2000	Sulfuric Acid	590	See Footnote 1	Before 3/1/05	X	X		4	\$23.00	\$ 78.00
177	SOUTH SHORE	2250 E. 78th St.	Chicago	IL		12/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50

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178	SPRINGFIELD	3115 DOTMAR DRIVE	SPRINGFIELD	IL		10/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
179	MW011038	1220 N State Parkway	Chicago	IL		11/29/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
180	State Parkway	1035 N. Throp	Chicago	IL		10/20/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
181	Throp	2410 S. River Rd.	Des Plaines	IL		12/2/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
182	Tri-State/Touhy	1601 S MARYLAND DRIVE	URBANA	IL		7/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
183	U OF I 2	100 S DESPLAINES ST	CHICAGO	IL		9/22/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
184	UIC/CH-GK-283	RR 800 E	VANDALIA	IL		11/15/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
185	VANDALIA	Rt. 1 Box 28 Lake St.	Elgin	IL		12/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
186	Villa Olivia	638 Lakeshore Blvd.	Wauconda	IL		12/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
187	WAUCONDA	4N633 Grandmas Lane	St. Charles	IL		12/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
188	Wayne	913 Milwaukee Ave.	Wheeling	IL		12/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
189	Wheeling															
189	WHITE OAKS (2001)	2927 S KOKE MILL ROAD	SPRINGFIELD	IL		10/12/2001	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		3	\$23.00	\$ 68.50
190	WI CENTRAL RR	Sec 33 T 4 N R 12 E	Des Plaines	IL		12/3/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
191	Woodridge	2800 Woodridge Dr.	Woodstock	IL		11/2/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
192	Woodstock	11910 Catalpa	Woodstock	IL		4/4/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
193	WRIGLEY FIELD	3535-37 N CLARK ST	CHICAGO	IL		12/5/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
194	Chesteron 2	US RT 20 AT RT 49	Chesteron	IN		10/12/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
195	Downtown/Virginia															
195	St.	1418 E. Michigan St.	Evanston	IN		6/2/2003	Sulfuric Acid	955	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
196	East Hammond	7029 W. 28th Ave.	Gary	IN		10/12/1997	Sulfuric Acid	587	See Footnote 1	Before 3/1/05	X	X		7	\$23.00	\$ 136.50
197	Kouts (2000)	829 Suncal Dr.	Kouts	IN		12/21/1998	Sulfuric Acid	508	See Footnote 1	Before 3/1/05	X	X		5	\$23.00	\$ 97.50
198	Michigan City	4266 N 525 W County Rd.	La Porte	IN		9/12/2003	Sulfuric Acid	943	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
199	North Hammond															
199	(Whiting)	2740 S. Sheffield	Hammond	IN		3/1/2003	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
200	Notre Dame	53741 Lamar	South Bend	IN		6/1/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
201	Portage	1376 Chisman Rd	Portage	IN		3/2/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
202	Wheeler	535 W. 600 N., Hobart	Portage	IN		11/2/2002	Sulfuric Acid	629	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
203	Berwyn Heights	4711 Berwyn House Rd.	College Park	MD		12/9/2003	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 19.50
204	Jacksonville	14209 Jarrattville Pike	Jacksonville	MD		6/1/2002	Sulfuric Acid	612	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
205	Silver Spring	8670 Georgia Avenue	Silver Spring	MD		9/2/2003	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
206	11 Mile & Haggerty	25200 Haggerty Road	Farmington Hills	MI		11/2/2004	Sulfuric Acid	522	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
207	6 Mile & Farmington	32340 Six Mile	Livonia	MI	3152-336	7/2/2002	Sulfuric Acid	518		Before 3/1/05	X	X		2	\$23.00	\$ 39.00
208	Airport North	27135 TROLLEY INDUS PLAZA	TAYLOR	MI	48180	10/10/2002	Sulfuric Acid	518		Before 3/1/05	X	X		2	\$23.00	\$ 39.00
209	Algonac	622 COLUMBIA	ALGONAC	MI	48001	10/28/2002	Sulfuric Acid	511		Before 3/1/05	X	X		2	\$23.00	\$ 39.00
210	Almont	315 Spring Street	Almont	MI	48003	12/1/2001	Sulfuric Acid	532		Before 3/1/05	X	X		3	\$23.00	\$ 56.50
211	Anchorville	37209 28 MILE RD.	Lenox	MI	3048-154	5/1/2003	Sulfuric Acid	619		Before 3/1/05	X	X		1	\$23.00	\$ 19.50
212	Ann Arbor East	2217 Hogback Road	Ann Arbor	MI		4/7/2004	Sulfuric Acid	543	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
213	Ann Arbor II	4114 Morgan Rd	Ypsilanti	MI	48197	10/14/2002	Sulfuric Acid	518		Before 3/1/05	X	X		2	\$23.00	\$ 39.00
214	Auburn Hills	3509 Auburn Rd.	Auburn Hills	MI	48057	9/30/2002	Sulfuric Acid	518		Before 3/1/05	X	X		2	\$23.00	\$ 39.00
215	Bancroft	1071 SOUTH STATE ROAD	Bancroft	MI	48414	10/23/2002	Sulfuric Acid	532		Before 3/1/05	X	X		2	\$23.00	\$ 39.00
216	Bay City North	2208 North Maple	Ann Arbor	MI	48014	5/19/2001	Sulfuric Acid	518		Before 3/1/05	X	X		3	\$23.00	\$ 56.50
217	Bay City South	1715 LEWIS ROAD	BAY CITY	MI	48706	11/9/2004	Sulfuric Acid	518		Before 3/1/05	X	X		0	\$23.00	\$ -
218	Beaumont	4611 Three Mile Rd.	Monitor Township	MI	48706	5/23/2001	Sulfuric Acid	518		Before 3/1/05	X	X		3	\$23.00	\$ 56.50
219	Birmingham	533 LEFTINGWELL STREET	GRAND RAPIDS	MI	49506	2/20/2003	Sulfuric Acid	502		Before 3/1/05	X	X		1	\$23.00	\$ 19.50
220	Big Beaver & Adams	3417 Bannington Road	Bannington Township	MI	48887	12/10/2002	Sulfuric Acid	533		Before 3/1/05	X	X		2	\$23.00	\$ 39.00
221	Birch Run	200 Strathmore	Bloomfield Twp.	MI	48083	12/2/2001	Sulfuric Acid	509		Before 3/1/05	X	X		2	\$23.00	\$ 39.00
222	Birmingham	9103 E. BIRCH RUN ROAD	BIRCH RUN	MI	48415	5/29/2002	Sulfuric Acid	533		Before 3/1/05	X	X		3	\$23.00	\$ 56.50
223	Downtown	225 MERRILL STREET	BIRMINGHAM	MI	48009	6/2/2002	Sulfuric Acid	514		Before 3/1/05	X	X		2	\$23.00	\$ 39.00
224	Bishop Airport	2470 Ballenger Rd.	Flint Twp.	MI	48507	12/23/1999	Sulfuric Acid	533		Before 3/1/05	X	X		5	\$23.00	\$ 97.50

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225	Bloomfield Hunt Club	1910 Stonycroft	Bloomfield Hills	MI	48304	12/2002	Sulfuric Acid	509	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
226	Briarwood	2506 S. State Street	Ann Arbor	MI	48106	4/7/2004	Sulfuric Acid	543	See Footnote 1	Before 3/1/05	X			0	\$23.00	\$ -
227	Brookfield	31500 Northwestern Hwy	Farmington Hills	MI	48334	12/2002	Sulfuric Acid	509	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
228	Cannonsburg	9921 Greenland	Rockford	MI	48341	11/3/2002	Sulfuric Acid	514	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
229	Capac	15525 Bryce	Capac	MI	48014	4/2/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
230	Capital Airport	925 STANLEY STREET	LANSING	MI	48915	3/9/2001	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
231	Cedar Springs	3980 11 MILE ROAD	ROCKFORD	MI	49341	10/21/2003	Sulfuric Acid	554	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
232	CK College	2025 E. BELTLINE, STE 308	GRAND RAPIDS	MI	49458	8/17/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
233	Clto	1449 HURD ROAD	VIENNA TOWNSHIP	MI	48420	12/3/2003	Sulfuric Acid	550	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
234	Cohocish	14608 Piers	Burns Township	MI	48418	7/18/2001	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
235	Coopersville	213 S. 48TH STREET	COOPERSVILLE	MI	49404	10/22/2003	Sulfuric Acid	554	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
236	Dalton	2591 Russell Rd	Muskegon	MI	49445	8/2/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
237	Davidson	5974 GENESSEE ROAD	LAPEER	MI	48448	11/19/2002	Sulfuric Acid	619	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
238	Davidson & L-98	1751 W. DAVISON AVENUE	DETROIT	MI	48238	4/2/2002	Sulfuric Acid	502	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
239	Detroit West II	18454 GRAND RIVER AVENUE	DETROIT	MI	48238	11/14/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
240	Dimondale	4780 GUNNELL	DIMONDALE	MI	48821	5/1/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
241	Downtown Saginaw	930 South 13th/2000 Whittier	Saginaw	MI	48601	9/25/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
242	Drake & 14 Mile	6811 Drake	West Bloomfield	MI	48325	1/10/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
243	Durand	16170 Phendon Rd.	Durand	MI	48131	10/27/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
244	Durand II	9469 GOODALL ROAD	VERNON TOWNSHIP	MI	48429	6/28/2001	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
245	East Lansing	333 Albert, Site 412	East Lansing	MI	48901	3/22/2004	Sulfuric Acid	625	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
246	Egypt Valley	8441 2 MILE ROAD	Grand Rapids	MI	49301	8/18/2001	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
247	Elizabeth Lake	4641 Elizabeth Lake Road	Waterford	MI	48054	10/7/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
248	Eureka & I275	36240-100 PENNSYLVANIA RD	ROMULUS	MI	48174	5/30/2001	Sulfuric Acid	514	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
249	Farmington Hills	33533 12 Mile Road	Farmington Hills	MI	48331	10/31/2002	Sulfuric Acid	514	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
250	Fenton	201 S FENWAY DRIVE	FENTON	MI	48430	7/19/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
251	Film West	4357 MILLER ROAD	FLINT	MI	48532	11/21/2002	Sulfuric Acid	511	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
252	Fosters	2000 E. TOWNLINE ROAD	BRIDGEPORT	MI	48722	1/28/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
253	Fowler	10730 W. WALKER ROAD	FOWLER	MI	48835	6/18/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
254	Fowlerville	706 E. VAN RIPE ROAD	FOWLERVILLE	MI	48836	11/1/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
255	Frankenmuth	418 List Avenue	Frankenmuth	MI	3734-19	8/14/2001	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
256	Fruitport	5330 Sheridan	Fruitport	MI	49415	5/12/2001	Sulfuric Acid	511	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
257	Garfield	42106 GARFIELD	MT. CLEMENS	MI	48044	11/18/2002	Sulfuric Acid	514	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
258	Ginger Lake & I75	4880 Maybee Rd.	Independence Twp.	MI	48348	4/1/2001	Sulfuric Acid	514	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
259	Goodrich	7214 State Rd	Alias Twp.	MI	48438	11/17/2002	Sulfuric Acid	600	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
260	Grand Blanc	4420 BALDWIN ROAD	GRAND BLANC	MI	48439	11/7/2002	Sulfuric Acid	530	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
261	Grand Blanc II	8166 Embury Road	Grand Blanc	MI	48439-816	11/5/2002	Sulfuric Acid	600	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
262	Grand Lege	14301 S. GRANGE ROAD	EAGLE	MI	48922	10/23/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
263	Grand Rapids North	3353 EAST BELTLINE AVENUE	GRAND RAPIDS	MI	48905	10/20/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
264	Grand River & I94	2031 Mark Street	Detroit	MI	48226	10/4/2004	Sulfuric Acid	628	See Footnote 1	Before 3/1/05	X			0	\$23.00	\$ -
265	Grabot & McNichols	13948 Grabot	Detroit	MI	48205	10/2/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
266	Greenfield & 12 Mile	29097 Greenfield	Southfield	MI	48076	8/11/1999	Sulfuric Acid	509	12/3/2004	Before 3/1/05	X	X		5	\$23.00	\$ 97.50
267	Hamlin & Dequindre	1477 E. Hamlin Rd.	Rochester Hills	MI	48077	1/14/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
268	Hamtramck	11669 Mt. Elliott	Detroit	MI	48212	11/17/2002	Sulfuric Acid	509	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
269	Haskell	1593 Haskell Rd.	Haskell	MI	48423	7/1/2004	Sulfuric Acid	543	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
270	Holland	438 W. 29TH STREET	HOLLAND	MI	49423	12/18/2002	Sulfuric Acid	646	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
271	Holt	820 Conrad	Lansing	MI	48933	9/22/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
272	Hudson Mills	7300 JOY RD	WEBSTER TOWNSHIP	MI	48130	4/1/2001	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
273	Hudsonville	5032 40TH AVENUE	HUDSONVILLE	MI	49428	1/16/2002	Sulfuric Acid	TBD	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00

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274	169 & M24	411 LAKE NEPESSESSING ROAD	ELBA TWP	MI	48807	4/10/2001	Sulfuric Acid	550	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
275	F-78 & Davison	14655 DEQUINDRE	DETROIT	MI	48226	11/6/2002	Sulfuric Acid	523	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
276	B4 & 1696	18179 SYCAMORE	ROSELVILLE	MI	48066	5/1/2003	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
277	B4 MORANG	19430 HARPER	HARPER WOODS	MI	48225	8/2/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
278	196 & 1498	2202 Ena Dr	Lansing	MI	48917	3/6/2001	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
279	196 & Livernois	9563 GRAND RIVER AVENUE	DETROIT	MI	48204	11/6/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
280	Imity	1640 FIRST STREET	MILAY CITY	MI	48444	4/4/2001	Sulfuric Acid	550	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
281	Island Lake Jefferson & Waterworks	11763 E. GRAND RIVER AVENUE	GREEN OAK TWP	MI	48116	9/25/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
282	Waterworks	330 VISTA AVENUE	DETROIT	MI	48207	3/1/2001	Sulfuric Acid	511	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
283	Jenison	7044 12th	Georgetown Township	MI	49426	10/13/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
284	Lainingsburg South	320 Railroad St	City of Lainingsburg	MI	48848	3/11/2001	Sulfuric Acid	532	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
285	Lake Argelus	317 COLLIER ROAD	AUBURN HILLS	MI	48057	6/1/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
286	Lakerville	1448 ROCHESTER ROAD	ADDISON TWP	MI	48367	4/30/2001	Sulfuric Acid	532	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
287	Lodge & Wyomiting	15368 Wyoming	Detroit	MI	48238	8/2/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
288	Lowell	6096 HASTINGS ROAD	BOSTON TWP	MI	48881	6/1/2003	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
289	M15 North	4335 N State Road	Davidson	MI	3423-855	8/2/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
290	M46 & M52	180 N. Graham Rd	Saginaw	MI	48609	8/2/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
291	M59 & Rochester	3035 ROCHESTER ROAD	ROCHESTER HILLS	MI	48307	11/1/2003	Sulfuric Acid	509	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
292	M59 & US23	878 OLD US 23	HARTLAND TWP	MI	48353	5/10/2001	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
293	Marine City	5300 KING ROAD	MARINE CITY	MI	48039	4/25/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
294	Mason	3270 Harper Rd.	Mason	MI	48554	7/22/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
295	Memphis	78500 Wahl Rd.	Richmond Twp.	MI	48062	4/1/2001	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
296	Metamora	726 Dryden Road	Metamora	MI	48640	5/1/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
297	Midland East	4604 James Savage	Midland	MI	48640	5/1/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
298	Milan	14666 SANFORD	MILAN	MI	48160	11/3/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
299	Millville	3965 COLIMBIA ROAD	DANSVILLE	MI	48119	2/25/2003	Sulfuric Acid	583	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
300	Monroe South	15417 LARSAUNCE ROAD	MONROE	MI	48161	10/29/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
301	Mt. Clemens East	38971 Jefferson Avenue	Harrison Twp.	MI	3045-228	6/2/2002	Sulfuric Acid	514	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
302	Mt. Clemens North	264 Elizabeth	Mt. Clemens	MI	48045	11/1/2002	Sulfuric Acid	514	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
303	Mt. Morris II	9094 DORT HIGHWAY	THETFORD TWP	MI	48116	5/23/2001	Sulfuric Acid	619	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
304	Mt. Brighton	310 FRANKLIN STREET	BRIGHTON	MI	48116	4/1/2001	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
305	New Boston	26155 WALTZ ROAD	NEW BOSTON	MI	48117	10/29/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
306	Newport	2349 Sklar Rd.	Carleton	MI	48117	11/4/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
307	North Maumee	2513 E. DEAN ROAD	ERIE TWP	MI	48133	8/11/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
308	Norton Shores	1121 SERINOLE	NORTON SHORES	MI	49441	8/11/2001	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
309	Oak Park	19978 JAMES COUZENS FRW	DETROIT	MI	48236	11/11/2002	Sulfuric Acid	509	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
310	Oakwood	2908 Indianwood Trail	Lake Orion	MI	48361	11/1/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		0	\$23.00	\$ 39.00
311	Okeemos	2379 CLUB MERIDIAN	OKEMOS	MI	48864	7/12/2004	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		0	\$23.00	\$ 39.00
312	Orchard Lake	4600 Walnut Lake Rd.	West Bloomfield	MI	48332	10/17/2002	Sulfuric Acid	509	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
313	Ortonville	594 S. Ortonville	Ortonville	MI	48462	7/18/2000	Sulfuric Acid	550	12/3/2004	Before 3/1/05	X	X		4	\$23.00	\$ 78.00
314	Owosso	809 MIDDLETON ROAD	CALEDONIA	MI	49316	10/22/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
315	Peterborough	13940 LULU ROAD	IDA	MI	48140	10/1/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
316	Pigeon Hill	921 Palski Dr	Mustagon	MI	49441	8/1/2001	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
317	Pinecreek	1594 Patterson Lake Road	Pinecreek	MI	3169-974	6/2/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
318	Plymouth	400 W PEARL ST	PLYMOUTH	MI	48170	4/12/00	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
319	Pontiac South	8120 FEATHERSTONE ROAD	PONTIAC	MI	48053	10/29/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
320	Port Huron	332 Griswold	Port Huron, Downtown	MI	48060	5/2/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
321	Portland	979 E GRAND RIVER TRAIL	PORTLAND	MI	48875	10/21/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
322	Portland Downtown	7679 E KNOX ROAD	PORTLAND	MI	48875	11/2/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
323	Rawsonville	10879 BLACKMORE	YPSILANTI TWP	MI	48197	5/12/2001	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
324	Reelfoot	23851 KELLER RD.	DETROIT	MI	48209	6/19/2003	Sulfuric Acid	509	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
325	Rochester South	1790 LIVERNOIS ROAD, BLDG	ROCHESTER HILLS	MI	48307	11/1/2002	Sulfuric Acid	509	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00

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326	Romeo	12497 34 Mile Rd.	Romeo	MI	48065	2/1/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
327	Romulus	28777 Eureka Rd., Suite 400	Romulus	MI	48174	5/4/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 58.50
328	Saginaw East	1953 26th Street	Buena Vista Twp.	MI	48601	2/6/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 19.50
329	Spring Lake	101 ROTARY STREET	SPRING LAKE	MI	49456	8/17/2001	Sulfuric Acid	511	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
330	St. Clair	8777 Rattle Run Rd.	St. Clair	MI	48079	4/3/2001	Sulfuric Acid	588	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
331	St. Clair Downtown	1554 Edison St.	St. Clair	MI	48079	4/2/2002	Sulfuric Acid	511	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
332	St. Johns North	20202 KIMON AVE	ST. JOHNS	MI	48879	10/15/2003	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
333	Taylor East	3575 VINEWOOD	Taylor	MI	48180	8/11/1999	Sulfuric Acid	509	12/3/2004	Before 3/1/05	X	X		5	\$23.00	\$ 97.50
334	Tiger Stadium	1488 Walton Road	DETROIT	MI	48197	11/14/2002	Sulfuric Acid	533	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
335	Walton & Crooks	5247 HUDSON ROAD	Rochester	MI	48308	6/4/1998	Sulfuric Acid	509	12/3/2004	Before 3/1/05	X	X		5	\$23.00	\$ 97.50
336	Waterford	15401 West 10 Mile	WATERFORD	MI	48329	5/1/2001	Sulfuric Acid	514	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
337	WDIV II	3551 VIADUCT STREET	Oak Park	MI	48374	10/16/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
338	West 28th Street	3320 W MAIN STREET	GRANDVILLE	MI	49418	10/16/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
339	West Lansing	228-B ELEVATOR STREET	LANSING	MI	48917	10/21/2002	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
340	Williamston	3503 WILLIS RD	WILLIAMSTON	MI	48895	10/20/2002	Sulfuric Acid	511	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
341	Willis & US23	3647 LINDEN	Yorktown Township	MI	48197	4/25/2001	Sulfuric Acid	511	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
342	Wyoming	9719 ADAMS ST	WYOMING	MI	48509	2/20/2003	Sulfuric Acid	518	12/3/2004	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
343	Zeeland	EAST GRAND FORKS	Zeeland Township	MI	49424	10/1/2001	Sulfuric Acid	511	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
344	East Grand Fork	Approx 300	LAGOON #22	MI	49424	10/20/2004	Sulfuric Acid	662	12/3/2004	Before 3/1/05	X	X		0	\$23.00	\$ -
345	Green	643 E. 7TH STREET	Gheen	MI	55771	11/1/1998	Sulfuric Acid	754	12/3/2004	Before 3/1/05	X	X		6	\$23.00	\$ 117.00
346	St Paul	100 PORK CITY HILL	St. Paul	MI	48180	6/4/1984	Sulfuric Acid	720	12/3/2004	Before 3/1/05	X	X		20	\$23.00	\$ 390.00
347	Two Harbors	202 Lewis Road	Two Harbors	MI	49895	12/28/1990	Sulfuric Acid	662	12/3/2004	Before 3/1/05	X	X		14	\$23.00	\$ 273.00
348	Antire & 44th	County Road 113	St. Louis	MO	63049	2/20/2004	Sulfuric Acid	508	12/3/2004	Before 3/1/05	X	X		0	\$23.00	\$ -
349	Dexter	230 FT 300 COR 902 & 0.30	Dexter	MO	63841	3/15/2002	Sulfuric Acid	700	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
350	Perryville	745 FT 300 COR 450 & COR 465	Perryville	MO	63775	8/2/2002	Sulfuric Acid	508	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
351	Poplar Bluff	1476S Highway 177	Poplar Bluff	MO	63755	8/1/2002	Sulfuric Acid	508	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
352	Proctor & Gamble	2110 N. Bishop Ave.	Rolla	MO	63755	4/1/2001	Sulfuric Acid	508	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 56.50
353	Rolla	4006 S. Broadway	Rolla	MO	63801	5/8/2001	Sulfuric Acid	508	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 56.50
354	S. Broadway	317 N WEST ST	St. Louis	MO	63801	1/15/2002	Sulfuric Acid	508	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
355	Sikeston II	2.4 Miles NNW of Warrenton	Sikeston	MO	63885	8/17/2002	Sulfuric Acid	508	12/3/2004	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
356	Warrenton		Warrenton	MO	63885	1/15/2004	Sulfuric Acid	562	12/3/2004	Before 3/1/05	X	X		0	\$23.00	\$ -
357	Raleigh New MTSC	3020 Hammond Rd.	Raleigh	NC		6/24/2004	Sulfuric Acid; Diesel; Lead	6480, 73588, 89264	See Footnote 1	Before 3/1/05	X	X	X	0	\$23.00	\$ -
358	Sweden Road	4700 Sweden Rd.	Charlotte	NC		5/1/2002	Sulfuric Acid	557	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
359	Wilmington Call Center	3601 Converse Drive	Wilmington	NC		6/1/2004	Sulfuric Acid, Diesel	644, 36260	See Footnote 1	Before 3/1/05	X	X	X	0	\$23.00	\$ -
360	Bluffton	200 Lake Street	Bluffton	OH		7/2/2002	Sulfuric Acid	533	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
361	Dunlap	11425 Colrain Ave	Cincinnati	OH		9/15/2004	Sulfuric Acid	549	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
362	Garfield Heights	9501 Granger Rd.	Garfield Heights	OH		8/23/2003	Sulfuric Acid	518	See Footnote 1	Before 3/1/05	X	X		1	\$23.00	\$ 19.50
363	Marion	365 Euclid Avenue	Marion	OH		7/15/2004	Sulfuric Acid	512	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
364	Republic	1043 State Route 67	Republic	OH		5/12/2004	Sulfuric Acid	515	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
365	Riley	2524 Sate Route 412	Fremont	OH		5/12/2004	Sulfuric Acid	515	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
366	Spencerville	3705 SECOR RD	Spencerville	OH		3/29/2002	Sulfuric Acid	533	See Footnote 1	Before 3/1/05	X	X		2	\$23.00	\$ 39.00
367	Talmeidge	15472 Wapakoneta	Toledo	OH		11/10/2001	Sulfuric Acid	535	12/3/2004	Before 3/1/05	X	X		3	\$23.00	\$ 58.50
368	Wapakoneta	Fisher Road	Wapakoneta	OH		10/12/2000	Sulfuric Acid	509	See Footnote 1	Before 3/1/05	X	X		4	\$23.00	\$ 78.00
369	West Beaver Creek	4329 Dayton Xenia Rd.	Dayton	OH		10/31/2004	Sulfuric Acid	553	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
370	West Carrollton	700 Liberty Lane	West Carrollton	OH		10/31/2004	Sulfuric Acid	506	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
371	Woodland & I-77	3538 Orange Ave.	Cleveland	OH		10/31/2004	Sulfuric Acid	508	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -
372	Woodville	5665 Sandusky County Rd	Woodville	OH		5/1/2004	Sulfuric Acid	569	See Footnote 1	Before 3/1/05	X	X		0	\$23.00	\$ -

EPCRA-REPORTABLE SITES

Count	Facility Name	Address	City	State	Zip	Date Triggering EPCRA Reportability	EPCRA Reportable Chemicals	EPCRA-Reportable Chemical Quantity (lbs)	Date Noncompliances Confirmed	Submission Date of Outstanding Filings	Section 311	Section 312	Section 302	Total R/Vs without Inventories	One Time Cost	Total of Annual Costs
373	Wooster Heights	1674 Mansfield-Lucas Rd.	Mansfield	OH		5/15/2001	Sulfuric Acid	562	See Footnote 1	Before 3/1/05	X	X	3	\$ 23.00	\$ 58.50	
374	Harrisburg	333 Market Street	Harrisburg	PA		8/17/2001	Sulfuric Acid	562	See Footnote 1	Before 3/1/05	X	X	3	\$ 23.00	\$ 58.50	
375	Wilkes Barre	67 Public Square, Wilkes Barre	Wilkes Barre	PA		10/22/2001	Sulfuric Acid	562	See Footnote 1	Before 3/1/05	X	X	3	\$ 23.00	\$ 58.50	
376	Wopsey (2 Towers)	Top of Lookout Road	Wopsey	PA		2/19/2004	Sulfuric Acid	690	See Footnote 1	Before 3/1/05	X		0	\$ 23.00	\$ -	
377	East Providence	404 Wampanoag Trail	Riverside	RI		6/18/2003	Sulfuric Acid	740	See Footnote 1	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
378	Charleston Cell	2401 Mail Drive	Charleston	SC		10/12/2004	Diesel	21968	See Footnote 1	Before 3/1/05	X (Diesel only)		0	\$ 23.00	\$ -	
379	Hartleyville	968 E. Main Street	Hartleyville	SC		9/22/2003	Sulfuric Acid	631	See Footnote 1	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
380	Wando	Rt. 1 Box 11 Calinboy Rd.	Wando	SC		9/17/2003	Sulfuric Acid	670	See Footnote 1	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
381	Franklin	2130 Curt Lane	Franklin	TN	37064	2/12/2004	Sulfuric Acid	655	12/3/2004	Before 3/1/05	X		0	\$ 23.00	\$ -	
382	Jackson	1520 North Parkway	Jackson	TN		6/17/2004	Sulfuric Acid	958	See Footnote 1	Before 3/1/05	X		0	\$ 23.00	\$ -	
383	Republic Center	653 Chestnut Street Suite 1400	Chattanooga	TN	37402	7/12/2003	Sulfuric Acid	918	12/3/2004	Before 3/1/05	X	X	4	\$ 23.00	\$ 78.00	
384	Riverview	200 Jefferson Ave	Memphis	TN		11/21/2003	Sulfuric Acid	536	See Footnote 1	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
385	Sugar Tree	780 Gossett Road	Sugar Tree	TN		7/15/2003	Sulfuric Acid	587	See Footnote 1	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
386	Wildersville	2500 Mt. Glad Road	Union Cross	TN		7/15/2003	Sulfuric Acid	587	See Footnote 1	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
387	Martin	Public Wells Road	Martin	TN		6/5/2004	Sulfuric Acid	597	See Footnote 1	Before 3/1/05	X		0	\$ 23.00	\$ -	
388	April Sound	HWY 105-McCaleb & Copeland	April Sound	TX		12/2/2002	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	3	\$ 23.00	\$ 58.50	
389	Ashbrook	3405 Ashbrook	Houston	TX	77081	8/1/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
390	Ashford	1415A Wilcrest	Houston	TX	77042	8/23/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
391	Astrodome	8686 Kirby	Houston	TX	77054	6/1/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
392	Baytown	807 1/2 East James Street	Baytown	TX	77520	8/3/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
393	Beechmont	8303 S.W. Fwy #865	Houston	TX	77074	10/23/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
394	BOBAIR	5327 FRY RD	KATY	TX	77450	4/30/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
395	Broadway (HTX)	313 Hwy 148	LaPorte	TX	77571	2/24/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	4	\$ 23.00	\$ 78.00	
396	CAMPBELL	7150 BREEN DR	HOUSTON	TX	77066	6/15/2002	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	2	\$ 23.00	\$ 39.00	
397	CLOINNE (REV)	13210 GABY VIRBO DR	HOUSTON	TX	77063	4/12/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
398	GONROE	1504 FM 2854	GONROE	TX	77304	3/13/2002	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	2	\$ 23.00	\$ 39.00	
399	CYPRESS	15837 HOUSE RD	HOCKLEY	TX	77429	6/16/2000	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	4	\$ 23.00	\$ 78.00	
400	FONDREN	7633 DASHWOOD DR	HOUSTON	TX	77036	7/1/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
401	FRIENDSWOOD # 5	109 1/2 E WILLOWICK AVE	FRIENDSWOOD	TX	77546	8/1/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
402	GREENSPONT/	11811 NORTH FWY	HOUSTON	TX	77060	8/29/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
403	HARLEY	1221 W 43RD ST	HOUSTON	TX	77018	7/17/2002	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	2	\$ 23.00	\$ 39.00	
404	Heritage Oaks (S-131)	10324 FM 1957	San Antonio	TX		1/29/2003	Sulfuric Acid	543	See Footnote 1	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	
405	Humble	16011 Old Humble Road	Humble	TX		4/1/2001	Sulfuric Acid	561	12/3/2004	Before 3/1/05	X	X	3	\$ 23.00	\$ 58.50	
406	Lewisville	1720 Lakepointe Dr.	Lewisville	TX		1/8/1999	Sulfuric Acid, Lead	1104, 11952	See Footnote 1	Before 3/1/05	X	X	5	\$ 23.00	\$ 97.50	
407	Center	Suite 100	Lewisville	TX		4/17/2004	Sulfuric Acid	535	See Footnote 1	Before 3/1/05	X		0	\$ 23.00	\$ -	
408	Lytle (S-93)	17031 Shepherd Rd. #1	Astascoga	TX		5/1/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	2	\$ 23.00	\$ 39.00	
409	MANDELL	4212 1/2 MT VERNON ST	HOUSTON	TX	77006	8/1/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	2	\$ 23.00	\$ 39.00	
410	WASON	21702 HIGHLAND KNOLLS DR	Katy	TX	77450	8/1/2003	Sulfuric Acid	578	12/3/2004	Before 3/1/05	X	X	2	\$ 23.00	\$ 39.00	
411	Meyerland (REV/598)	4510 Jackwood	Houston	TX		7/1/2003	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X	2	\$ 23.00	\$ 39.00	
412	Mission Bend	7324 Clodine Reddick Rd.	Houston	TX		6/1/2004	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X	2	\$ 23.00	\$ 39.00	
413	Mont Behaveu	3203 Bridget Lane	Mont Behaveu	TX		11/1/2001	Sulfuric Acid	561	12/3/2004	Before 3/1/05	X	X	3	\$ 23.00	\$ 58.50	
414	NORTH HOUSTON	12122 DULA	Cypress	TX	77429	5/1/2004	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X		0	\$ 23.00	\$ -	
415	Peterson Landing / 9P-Peterson Landing	1500 Green Pine and Russell Permer	Kingwood	TX		6/30/2003	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X	1	\$ 23.00	\$ 19.50	

EPCRA-REPORTABLE SITES

Count	Facility Name	Address	City	State	Zip	Date Triggering EPCRA Reportability	EPCRA Reportable Chemicals	EPCRA-Reportable Chemical Quantity (lbs)	Date Noncompliance Confirmed ¹	Submission Date of Outstanding Filings ²	Section 311	Section 312	Section 302	Total RYs without Inventories	One Time Cost	Total of Annual Costs
416	Porter	FM 1485 E	Porter	TX		6/1/2001	Sulfuric Acid	736	See Footnote 1	Before 3/1/05	X	X	X	3	\$23.00	\$ 58.50
417	REVIELLE	5575 FM 1179	College Station	TX	77840	1/7/2003	Sulfuric Acid	578	12/2/2004	Before 3/1/05	X	X	X	1	\$23.00	\$ 19.50
418	San Gerontimo	18970 State Hwy 16	Houston	TX		10/7/2004	Sulfuric Acid	543	See Footnote 1	Before 3/1/05	X	X	X	0	\$23.00	\$ -
419	Samford	1822 Ojeman Rd.	Houston	TX		7/4/2003	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X	X	1	\$23.00	\$ 19.50
420	Sheldon	479 Sheldon Rd.	Channelview	TX		9/1/2004	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X	X	0	\$23.00	\$ -
421	Sugarland (Rev 0599)	2050 Owens Rd	Sugar Land	TX		4/15/2003	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X	X	1	\$23.00	\$ 19.50
422	Washington	109 Waco St.	Bryan	TX		15/2003	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X	X	1	\$23.00	\$ 19.50
423	Waylon	12555 Silver Lake Rd.	Humble	TX		7/1/1989	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X	X	5	\$23.00	\$ 97.50
424	Westheimer	1600 S. Gessner Dr.	Houston	TX		8/9/2003	Sulfuric Acid	578	See Footnote 1	Before 3/1/05	X	X	X	1	\$23.00	\$ 19.50
425	WOODLANDS	2227 GOLDEN RD.	THE WOODLANDS	TX	77380	8/4/2003	Sulfuric Acid	578	12/2/2004	Before 3/1/05	X	X	X	1	\$23.00	\$ 19.50
426	Pungo	2081 Indian River Rd.	Virginia Beach	VA		9/27/2002	Sulfuric Acid	652	See Footnote 1	Before 3/1/05	X	X	X	2	\$23.00	\$ 39.00
427	Walker	5750 Mt. Pleasant Rd.	New Kent	VA		5/15/2002	Sulfuric Acid	504	See Footnote 1	Before 3/1/05	X	X	X	2	\$23.00	\$ 39.00
428	Apple Cove	27055 Ohio Avenue, N.E.	Kingston	VA		1/1/2000	Sulfuric Acid	720	See Footnote 1	Before 3/1/05	X	X	X	4	\$23.00	\$ 78.00
429	Capital Centre	344 W. Dayton	Madison	WI		6/30/2004	Sulfuric Acid	684	See Footnote 1	Before 3/1/05	X	X	X	0	\$23.00	\$ -
430	High Point	2.1 Miles SW of Ridge	Ridge	WV		6/1/2002	Sulfuric Acid	562	See Footnote 1	Before 3/1/05	X	X	X	2	\$23.00	\$ 39.00
431	Cherokee Peak	5244 North Avenue	Rawlins	WY		8/1/1993	Sulfuric Acid	612	See Footnote 1	Before 3/1/05	X	X	X	11	\$23.00	\$ 214.50
432	Flat Top Mountain	BLM #132878/T14N, R63W, 8th P.M. 15.5mi NW of Briggs	Briggs	WY		6/2/2002	Sulfuric Acid	756	See Footnote 1	Before 3/1/05	X	X	X	2	\$23.00	\$ 39.00
Total															\$8,938.00	\$15,873.00

Footnotes:

1. With reference to USEPA's letter dated January 12, 2005, we have used the period of time following the initial violations on December 3, 2004 through February 12, 2005.

2. Cost of Compliance includes the costs associated with baselining the site, assessing regulatory applicability, preparing and submitting the report. See chart

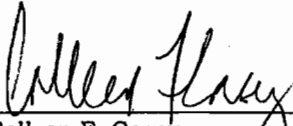
Description	Job Type	Hours	Cost	Unit	Frequency	One-Time Cost	Annual Cost
Baselining Site	Field	0.5	\$10.00	Per Site	One-time		
Remaining Data Assessing	Env. Spec.	0.25	\$8.00	Per Site	One-time	\$23.00	
Assessing Receipts & Entering into System	Admin	0.25	\$5.00	Per Site	One-time		
Pre & Run Reportorial out	Admin	0.5	\$10.00	Per Site	Annual		
Review/Sign	Mgt	0.1	\$4.50	Per Site	Annual		\$19.50
Reproportionage		N/A	\$5.00	Per Site	Annual		

3. As approved by the USEPA, all current and historical filings will be made no later than March 1, 2005.

ATTACHMENT B

CERTIFICATION

On behalf of Celco Partnership d/b/a Verizon Wireless ("Verizon Wireless"), I hereby certify that no site evaluated as part of Verizon Wireless's August 2001 self-disclosure is included as part of the current audit and self-disclosure.



Colleen F. Casey
Associate Director- Network Compliance



"Banks, James T."
<JTBanks@HHLAW.com>

06/22/2005 05:32 PM

To Beth Cavalier/DC/USEPA/US@EPA, David
Abdalla/DC/USEPA/US@EPA

cc

bcc

Subject List of Additional Verizon Sites.

Here are the additional sites I mentioned. The list totals 22, but as you can see there are open questions about whether there ever were violations for 3 of those. Jim

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CA BkYr sites May-June 2005.xls

Count	Site Name	Address	City	State	Zip Code	County	Date Triggering EPCRA Reportability	Date Discovered	EPCRA Reportable Chemicals	EPCRA Chemical Quantity in (lbs)	EPCRA Section 311	EPCRA Section 312	EPCRA Section 302
1	Bonsall	4163 Holly Lane	Bonsall	CA	92003	San Diego	10/11/2004	5/11/2005	Sulfuric Acid	522	X	X	
2	Casa Loma Crossroads	2040 Casa Loma Drive 2 Meadowbrook	Bakersfield	CA	93721	Kern	10/26/2004	6/10/2005	Sulfuric Acid	684	X	X	
3	Dana Hills	33333 Street of the Golden Lantern	Irvine	CA	92714	Orange	2/28/2004	5/26/2005	Sulfuric Acid	548	X	X	
4			Dana Point	CA	92629	Orange	2/28/2004	5/26/2005	Sulfuric Acid	535	X	X	
5	El Morro Replacement	8601 North Coast Highway (El Morro Reservoir)	Laguna Beach	CA	92651	Orange	2/27/2004	5/26/2005	Sulfuric Acid	Currently not reportable. Working to field verify and confirm never was reportable.			
6	Good Shepherd	18080 Beach Boulevard	Huntington Beach	CA	92648	Orange	3/3/2004	5/26/2005	Sulfuric Acid	535	X	X	
7	Huntington Beach 2	1905 Main Street	Huntington Beach	CA	92648	Orange	3/3/2004	5/26/2005	Sulfuric Acid	552	X	X	
8	KFI	14670 East Firestone, Suite 415	La Mirada	CA	90638	Orange	3/16/2004	5/11/2005	Sulfuric Acid	Currently not reportable. Working to field verify and confirm never was reportable.			
9	Kingsley Park	5179 Brooks Street, Unit E	Montclair	CA	91763	Los Angeles	5/4/2004	5/26/2005	Sulfuric Acid	Currently not reportable. Working to field verify and confirm never was reportable.			
10	La Habra	240 East 4th Avenue 600 North Poplar Street (20286)	La Habra	CA	90631	Orange	3/17/2004	6/22/2005	Sulfuric Acid	534	X	X	
11	Laguna Beach	Laguna Canyon Rd.	Laguna Beach	CA	92651	Orange	2/27/2004	5/26/2005	Sulfuric Acid	559	X	X	
12	Live Oak	10 West Live Oak Avenue	Arcadia	CA	91007	Los Angeles	3/22/2004	5/26/2005	Sulfuric Acid	522	X	X	
13	Manchester	8106 South Figueroa Street	Los Angeles	CA	90003	Los Angeles	4/1/2004	5/26/2005	Sulfuric Acid	551	X	X	
14	Panorama City	8955 Sepulveda Blvd., Unit C	Sepulveda	CA	91340	Los Angeles	3/12/2004	5/26/2005	Sulfuric Acid	535	X	X	
15	Pomona 2	2157 Murchison Blvd., Unit 850	Pomona	CA	91768	Los Angeles	11/11/2004	5/26/2005	Sulfuric Acid	522	X	X	
16	Port Hueneume	650 Mountain View Avenue	Oxnard	CA	93030	Ventura	10/12/2004	5/26/2005	Sulfuric Acid	513	X	X	
17	Puente Hills	3179 Temple Avenue	Pomona	CA	91768	Los Angeles	4/14/2004	5/26/2005	Sulfuric Acid	523	X	X	
18	Ramona SD	18303 Spring Wagon Road	Ramona	CA	92065	San Diego	10/4/2004	5/26/2005	Sulfuric Acid	541	X	X	
19	Rowland Heights	18624 Railroad Street	City of Industry	CA	91748	Los Angeles	3/25/2004	5/26/2005	Sulfuric Acid	523	X	X	
20	San Gabriel	318 South Mission Road	San Gabriel	CA	91776	Los Angeles	4/22/2004	5/26/2005	Sulfuric Acid	535	X	X	
21	San Ysidro	2473 Monument Rd. #8	San Diego	CA	92154	San Diego	10/13/2004	5/11/2005	Sulfuric Acid	522	X	X	
22	Tarzana	18601 Oxnard Street	Tarzana	CA	91356	Los Angeles	3/16/2004	5/26/2005	Sulfuric Acid	522	X	X	

Attachment C

**Letter from James T. Banks, dated Jan. 26, 2005
re:previous disclosures by Cellco Partnership and its
Affiliates Doing Business as Verizon Wireless**

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Confidential Settlement Communication

January 26, 2005

VIA ELECTRONICALLY AND OVERNIGHT MAIL

Ms. Beth Cavalier
Analyst
Special Litigation and Projects Division (2248A)
Office of Regulatory Enforcement
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Audit Policy Disclosure by Verizon Wireless

Dear Ms. Cavalier:

I am writing to you on behalf of Cellco Partnership and its affiliates doing business as Verizon Wireless in connection with the Company's December 23, 2004 Audit Policy Disclosure. In an effort move this matter to a prompt conclusion, Verizon Wireless is addressing the following matters raised in your January 12, 2005 letter to me:

1. Condition 7- No Repeat Violations – is addressed in Attachment A hereto;
2. Coverage of facilities evaluated as part of the August, 2001 self-disclosure, also addressed in Attachment A; and
3. Self-Disclosure Questionnaire Responses are addressed in Attachment B hereto.

Verizon Wireless currently anticipates that it will be able to provide the remaining requested information by February 12. This information will

Ms. Beth Cavalier
U.S. Environmental Protection Agency
January 26, 2005
Page 2

include the compliance report for each facility, a certification that no facilities included in the Company's 2001 self-disclosure are included in the current self-disclosure, and cost of compliance information.

With regard to the audit policy requirement that facilities be returned to compliance within 60 days of discovering a violation, we propose that March 1 is an appropriate date for all facilities to be in compliance under EPCRA regardless of the date a violation at a particular facility is confirmed. As indicated in the December 23 Disclosure, Verizon Wireless is in the process of evaluating potential violations. Whether those potential violations are actual violations will be determined on a site-by-site basis on a variety of dates. Because the Company also is in the midst of making its annual Tier II filings for approximately 2500 sites, it would be helpful if we could plan to make all current and, where necessary, back filings according to the schedule for submitting filings for 2004. This would mean that all violations would be corrected no later than March 1. Please let me know if this is acceptable.

Thank you for your attention to this matter. I will call you later in the week to see if you have any questions or require any additional information.

Sincerely,


James T. Banks

Cc: David Abdalla
Colleen Casey (via facsimile)
Robert O. Strobel, Esq. (via facsimile)

ATTACHMENT A
January 26, 2005

EXPLANATION OF VERIZON WIRELESS COMPLIANCE
HISTORY IN CONNECTION WITH
DECEMBER 23, 2004 DISCLOSURE:
CONDITION 7- NO REPEAT VIOLATIONS

Other than the self-disclosures that are the subject of the December 3, 2001 Final Order of the Environmental Appeals Board In the Matter of Cellco Partnership d/b/a Verizon Wireless, Docket No. EPCRA-HQ-2001-6040 ("2001 Self-disclosure"), Cellco Partnership and its affiliates have made no other self-disclosures within the past 5 years, and have not otherwise experienced any pattern of violations at their facilities.

The violations identified in the 2001 Self-disclosure are not part of a pattern of violations that would render Cellco Partnership and its affiliates doing business as Verizon Wireless ineligible under the "Incentives for Self-policing: Discovery, Correction and Prevention of Violations", 65 Fed. Reg. 19618, April 11, 2000 (the "Policy"). That self-disclosure related to newly acquired sites where the violations existed prior to acquisition, and violations at such sites do not trigger the repeat violation exclusion. Policy, 65 Fed. Reg. at 19623.

The 120 sites identified in the 2001 Self-disclosure were among the approximately 5800 sites ("AirTouch Sites") acquired in April 2000 by Cellco Partnership from Vodafone AirTouch Plc. in connection with the formation of a national wireless business that was given a "doing business as" or d/b/a name of Verizon Wireless. In the course of integrating the newly acquired AirTouch Sites into Verizon Wireless in preparation for the initial Verizon Wireless EPCRA Section 312 filings for the calendar year 2000, Verizon Wireless discovered that the frequency of submissions and recipients of submissions in California may not have been fully compliant for reporting years prior to the sites' acquisition by Verizon Wireless. Because those violations pre-dated the acquisition of the sites by Verizon Wireless, they should not be considered for purposes of determining if there is a repeat violation by Verizon Wireless.

Verizon Wireless confirms that none of the facilities evaluated as part of the August, 2001 self-disclosure are to be included as part of the current self-disclosure.

VERIZON WIRELESS RESPONSE TO EPA
SELF-DISCLOSURE QUESTIONNAIRE

1. Describe the violation and state the specific regulatory or statutory provision violated.

As indicated in the Table of Facilities submitted with Verizon Wireless's self disclosure, some or all of the following types of potential violations have occurred at these facilities:

- a. Failure to notify the State emergency response commission that certain of the facilities are subject to emergency planning requirements. Emergency Planning and Community Right to Know Act ("EPCRA") Section 302, 42 U.S.C. Section 11022.
- b. Failure to submit to the local emergency planning commission ("LEPC"), the State emergency response commission ("SERC") and the local fire department a material safety data sheet for covered chemicals or a list of such chemicals within 30 days of exceeding the threshold for such chemicals at certain facilities. EPCRA Section 311, 42 U.S.C. Section 11021.
- c. Failure to submit EPCRA Tier II reports to the LEPC, SERC and local fire department for chemicals exceeding the reporting threshold at certain facilities. EPCRA Section 312, 42 U.S.C. Section 11022.

2. Explain how the violation was discovered. Please be as detailed as possible.

The violations were discovered as the result of a review by Verizon Wireless's corporate environmental group of baseline information entered into the company's intranet-based environmental management information system (EMIS) as part of a concerted, systematic effort to ensure that all baseline information was current and accurate. The baseline information includes the dates and types of battery systems and the size of fuel storage tanks used in generator systems for all non-retail locations.

3. State whether the violation of a federal, state, or local regulation was discovered by means of a systematic, internal, environmental audit or through a compliance management system ("CMS").

The violations were discovered through systematic, internal audit of information entered into EMIS as part of the company's CMS. Copies of Verizon Wireless's most relevant policies, standards and procedures are attached hereto. These materials are located on the company intranet and are available to all employees. The materials present regulatory requirements in an activity based (i.e. installing a battery pack) and regulation based (i.e. information on a specific regulatory program such as EPCRA) format. They also explain how and when to update information in EMIS. For example, fuel tank information is to be added to EMIS before the tank is purchased, and changes in battery information is required to added to EMIS within 10 days after such change. Dick Lynch, Executive Vice President and Chief Technology Officer, is also the Corporate Environmental Compliance Officer. The program is implemented through Colleen Casey, Associate Director-Compliance, and responsibility for compliance in various areas of the country is assigned to her corporate environmental staff. In addition, the company maintains a "hotline" staffed by a third party vendor that can be called to report potential violations of environmental requirements on an anonymous basis (none of these violations was discovered through the hotline).

Because EMIS is a new intranet based system that replaced a manual system in early 2004, the corporate environmental group initiated a concerted campaign in fall 2004 to have the information in EMIS reviewed and updated. Although this was a focused effort, the company's procedures are always available to all employees on the intranet and the importance of environmental compliance is part of the Company's Code of Conduct, which is distributed annually to employees. More particularly, the corporate environmental group holds bi-monthly calls with the regional staff responsible for updating EMIS to review compliance procedures and matters.

As indicated, environmental compliance is part of Our Code of Conduct. The Code makes clear that "[v]iolations of the law, Our Code, and other Company policies, procedures, instructions, practices and the like can lead to disciplinary action up to and including termination from employment...Supervisors may also be disciplined for failure to take action to prevent and detect violations..." In response to the discovery of the violations subject to this disclosure, the corporate

environmental group has requested a certification from managers around the company that EMIS has been updated and is accurate. In addition, in-house environmental counsel is participating in the bi-monthly calls to emphasize the need to make real-time updates to EMIS and the serious consequences that can result from failing to do so.

4. **Was the violation discovered through an activity which Verizon Wireless was legally required to perform, such as a State or Federal statute, regulation or permit, or under the terms of a judicial or administrative order or consent agreement? If so, identify the authority under which the activity was required.**

No. As indicated above, the violations were discovered through a voluntary review conducted by the Company.

5. **Is the violation required to be reported under any Federal or State statute, regulation or permit? If so, identify each such statute, regulation or permit.**

No.

6. **State the date on which the violation was discovered. If Verizon Wireless believed additional analysis or information was needed after the audit/systematic procedure or practice to determine whether a violation existed, state the reasons for the additional analysis.**

The potential violations initially disclosed to EPA on December 23, 2004 were identified on December 2-3, when the corporate environmental staff completed its review of the information entered into EMIS as a result of the fall 2004 push to drive updating of the information. Because the reporting thresholds were in many cases exceeded by only a slight amount of sulfuric acid in batteries and the calculation of the amount of sulfuric acid in a battery is not always straightforward, the staff continues to carefully check the information entered in EMIS to confirm its accuracy. Any violations in addition to the potential violations identified in the company's December 23 letter to EPA will be identified on a variety of dates during the period provided by EPA to review our approximately 21,000 sites.

7. **If disclosure of the violation was not within 21 days of the date of discovery, or such shorter period as may be provided by law,**

please explain, in detail, the reasons that the violation was not disclosed within 21 days of discovery.

EPA granted Verizon Wireless additional time to complete its audit of its facilities and submit a final self-disclosure report.

- 8. Identify the name, title, and employer of each individual who discovered the violation.**

Colleen Casey
Associate Director-Compliance
Verizon Wireless

- 9. If the violation was discovered by an independent auditor, (that is, by a person not employed by Verizon Wireless), provide the date and the manner in which Verizon Wireless was made aware of the violation.**

Not applicable.

- 10. Explain in detail all measures taken to correct or remediate the violation. Provide an estimate of the length of time it took or will take to complete these measures. If Verizon Wireless estimates that more than 60 days will be needed to correct the violation, please explain fully and provide the opinion of any technical expert relied upon to arrive at that estimate.**

As new or updated site information is submitted into the online EMIS tool by regional staff, it is placed into a queue for review of completeness and accuracy. Upon approval, the data is loaded directly into the compliance review queue in the system. If information is found incomplete or incorrect, automatic e-mail notification is made to the regional sender of the data. This is an iterative process as there are more than 500 battery models used as back-up power across the regions, and the variation on configurations is considerable. Ensuring proper inventorying is critical to accurately determining EPCRA-reportability. The verification often requires a follow-up trip to the site.

Upon verification that a site has become EPCRA-reportable, the proper recipients (e.g., SERC, LEPC and Fire Department with jurisdiction) are located and their contact information is entered into EMIS. EMIS is then used to generate the appropriate notification (e.g. Section 302 letter, Section 311 letter, and Section 312 Filing). Dates of such

correspondence are then keyed into EMIS. Corrective action for all sites identified through this self-disclosure will be taken no later than March 1, 2005. All information is maintained in EMIS for use in preparing future annual Section 312 filings.

- 11. Explain in detail all measures taken or to be taken to ensure that the violation disclosed will not be repeated. Include in your discussion any improvements made to Verizon Wireless environmental auditing or CMS efforts in an attempt to prevent recurrence of the violation.**

As described above, the corporate environmental group has requested that managers across the country certify that EMIS has been fully and accurately updated. The impact of this should be two-fold: ensure current compliance, and educate the managers on the need to make sure that their staffs fully utilize the system in accordance with company procedures. In addition, in-house environmental counsel is participating in a series of calls that occur bi-monthly with field staff to emphasize the need for real-time use of EMIS and the potential consequences for failing to do so.

To ensure that regions are regularly using EMIS and that updates are being performed in a timely manner, the corporate environmental group will prepare reports every 30 days showing EMIS activity for each region. During each bi-monthly conference call, the respective region will be required to confirm that all field changes are reflected in EMIS-generated reports. In addition, the corporate environmental group will require annually a certification from managers around the company that EMIS has been updated on a timely basis and is accurate.

- 12. Did the violation result in any serious actual harm to human health or the environment? Provide a full explanation of how this conclusion was reached.**

No. The violations involve the administrative filing of lists of chemicals or MSDSs and EPCRA Tier II reports. The company has not received any reports of harm to human health or the environment as a result of the violations.

- 13. Did the violation present or may it present, any form of endangerment to public health or the environment? Provide a full explanation of how this conclusion was reached.**

Verizon Wireless understands that the objective of the EPCRA program is to provide information that will enable emergency response officials to plan for precautions that can minimize endangerment to public health and the environment. The company fully supports this objective, and has implemented its EMIS, as well as the systematic review that prompted this self disclosure, to ensure that our information is both accurate and provided in a timely manner to the appropriate officials.

The company's self-disclosure obviously demonstrates that our previous, manual information system had failed to meet this objective. The review undertaken by our corporate environmental group also demonstrates that the company's CMS is effecting continuous improvement in our compliance program.

While Verizon Wireless does not view this number of violations as acceptable by any means, we also do not believe the violations presented endangerment to public health or the environment. In numerous instances, for example, the reported violations resulted from a failure to recognize that sulfuric acid amounts contained within batteries were slightly above the reporting threshold, and thus the amounts on-site were not significantly different from amounts that would be encountered by emergency-response personnel had there been no violation of reporting requirements. In addition, we believe the use of sulfuric acid in batteries for backup power is so widespread in our industry, and in many others, that emergency response officials are cognizant of the precautions needed in addressing potential releases at such facilities. Moreover, Verizon Wireless is not aware of any incident to date where the sulfuric acid has been released from a battery in such a way as to endanger public health or the environment and does not believe that such a release is in any way imminent at any of its sites. Finally, we would note that the Agency has not found any potential endangerment to public health or the environment in the course of resolving dozens of substantially identical self disclosures by telecommunications companies throughout the country over the past several years.

- 14. Did the violation violate the specific terms of a judicial or administrative order or consent agreement? If so, please identify the order or agreement.**

No.