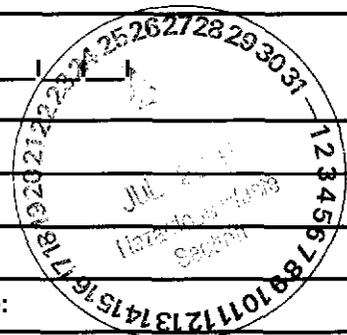


<p>SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office.</p>	<p>United States Environmental Protection Agency</p> <p>RCRA SUBTITLE C SITE IDENTIFICATION FORM</p>		
<p>1. Reason for Submittal (See instructions on page 13.)</p> <p>MARK ALL BOX(ES) THAT APPLY</p>	<p>Reason for Submittal:</p> <p><input type="checkbox"/> To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)</p> <p><input checked="" type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)</p> <p><input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application</p> <p><input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)</p> <p><input type="checkbox"/> As a component of the Hazardous Waste Report</p>		
<p>2. Site EPA ID Number (page 14)</p>	<p>EPA ID Number <u> N C R 0 0 0 0 0 0 3 1 5 </u></p>		
<p>3. Site Name (page 14)</p>	<p>Name: Bluegrass Labels Company, LLC</p>		
<p>4. Site Location Information (page 14)</p>	<p>Street Address: 1006 Norwalk Street</p>		
	<p>City, Town, or Village: Greensboro</p>	<p>State: NC</p>	
	<p>County Name: Guilford</p>	<p>Zip Code: 27407</p>	
<p>5. Site Land Type (page 14)</p>	<p>Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		
<p>6. North American Industry Classification System (NAICS) Code(s) for the Site (page 14)</p>	<p>A. <u> 5 6 1 9 1 </u></p>	<p>B. <u> </u></p>	
	<p>C. <u> </u></p>	<p>D. <u> </u></p>	
<p>7. Site Mailing Address (page 15)</p>	<p>Street or P. O. Box: Same as Item 4</p>		
	<p>City, Town, or Village:</p>		
	<p>State:</p>		
	<p>Country:</p>	<p>Zip Code:</p>	
<p>8. Site Contact Person (page 15)</p>	<p>First Name: Lynda</p>	<p>MI:</p>	<p>Last Name: Leonhard</p>
	<p>Phone Number: (336)316-5080 Extension:</p>		<p>Email address: lleonhard@smurfit.com</p>
<p>9. Operator and Legal Owner of the Site (pages 15 and 16)</p>	<p>A. Name of Site's Operator: Bluegrass Labels Company, LLC</p>		<p>Date Became Operator (mm/dd/yyyy): June 30, 2006</p>
	<p>Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		
	<p>B. Name of Site's Legal Owner: Bluegrass Container Company, LLC</p>		<p>Date Became Owner (mm/dd/yyyy): June 30, 2006</p>
	<p>Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other</p>		



9. Legal Owner (Continued) Address	Street or P. O. Box: 301 Commerce Street, Suite 3300	
	City, Town, or Village: Fort Worth	
	State: Texas	
	Country:	Zip Code: 76102

10. Type of Regulated Waste Activity
Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities
Complete all parts for 1 through 6.

1. Generator of Hazardous Waste
If "Yes", choose only one of the following - a, b, or c.
- a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
 - b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
 - c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste
- In addition, indicate other generator activities.
- d. United States Importer of Hazardous Waste
- e. Mixed Waste (hazardous and radioactive) Generator

2. Transporter of Hazardous Waste
3. Treater, Storer, or Disposer of Hazardous Waste (at your site) Note: A hazardous waste permit is required for this activity.
4. Recycler of Hazardous Waste (at your site)
5. Exempt Boiler and/or Industrial Furnace
If "Yes", mark each that applies.
- a. Small Quantity On-site Burner Exemption
 - b. Smelting, Melting, and Refining Furnace Exemption
6. Underground Injection Control

B. Universal Waste Activities

1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste generated and/or accumulated at your site. If "Yes", mark all boxes that apply:

	<u>Generate</u>	<u>Accumulate</u>
a. Batteries	<input type="checkbox"/>	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>	<input type="checkbox"/>
c. Thermostats	<input type="checkbox"/>	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>	<input type="checkbox"/>

2. Destination Facility for Universal Waste
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities
Mark all boxes that apply.

1. Used Oil Transporter
If "Yes", mark each that applies.
- a. Transporter
 - b. Transfer Facility
2. Used Oil Processor and/or Re-refiner
If "Yes", mark each that applies.
- a. Processor
 - b. Re-refiner
3. Off-Specification Used Oil Burner
4. Used Oil Fuel Marketer
If "Yes", mark each that applies.
- a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
 - b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 21.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

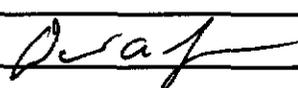
D001						

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 21.)

This facility is currently owned and operated by Smurfit-Stone Container Enterprises, Inc. As part of a stock and asset purchase agreement, ownership of the facility is scheduled to transfer to Bluegrass Container Company, LLC on June 30, 2006. As of the date of ownership transfer, Bluegrass Container Company, LLC will operate the facility under the name Bluegrass Labels Company, LLC.

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Mr. David Spuria	07/18/2006
	Vice President - Bluegrass Container Company, LLC	

July 18, 2006

NCDENR -Hazardous Waste Section
1646 Mail Service Center
Raleigh, NC 27699-1646

Re: Transfer of Ownership -Hazardous Waste ID Numbers

Permittee/Seller: Smurfit-Stone Container Enterprises, Inc. (d/b/a Smurfit-Stone Container Corporation)

Transferee/Buyer: Bluegrass Container Company, LLC

Facility Location: 1006 Norwalk Street, Greensboro, NC 27407

Permit / ID #: NCR000000315

Dear Sir/Madam:

Smurfit-Stone Container Enterprises, Inc. (d/b/a Smurfit-Stone Container Corporation) ("Smurfit-Stone") is in the process of completing a transaction (the "Acquisition"), which will result in the sale of the business and substantially all of the assets of the Consumer Packaging Division of Smurfit-Stone to Bluegrass Container Company, LLC. Bluegrass Container Company, LLC is the parent company for Bluegrass Labels Company, LLC (the "Operator"). This sale and purchase of Smurfit-Stone's Consumer Packaging Division will include the transfer by Smurfit-Stone to the Operator of the above-referenced Hazardous Waste Generator Identification Number (the "Permit").

We are writing to provide you formal notice of the Acquisition and related transfer of the Hazardous Waste ID Number. As of the closing on June 30, 2006, Operator agreed to assume all rights and obligations under the Permit and will assume, agree to perform, and in due course discharge the obligations of Smurfit-Stone under the Permit.

The technical contact information for the Operator immediately after closing shall be:

Lynda Leonhard, Environmental Coordinator

336-316-5080

July 18, 2006

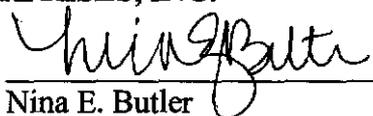
Page 2

If you have any questions regarding this request to transfer the Permit for the above-referenced facility, please contact the undersigned.

Very truly yours,

**SMURFIT-STONE CONTAINER
ENTERPRISES, INC.**

By:



Nina E. Butler

VP & Senior Environmental Counsel

**BLUEGRASS CONTAINER
COMPANY, LLC**

By:



David Spuria

Vice President

Address: 1979 Lakeside Parkway
Suite 300
Tucker, Georgia 30084

Address: c/o Texas Pacific Group
301 Commerce Street
Suite 3300
Fort Worth, Texas 76102

Phone: 770-621-6741

Fax: 770-621-6733

Email: nbutler@smurfit.com

Phone: 817-871-4080

Fax: 817-871-4001



North Carolina Department of Environment and Natural Resources
DIVISION OF WASTE MANAGEMENT

Dexter R. Matthews, Director

Michael F. Easley, Governor
William Q. Ross, Jr., Secretary

August 16, 2006

LYNDA LEONHARD
BLUEGRASS LABELS COMPANY, LLC
1006 NORWALK ST
GREENSBORO NC 27407

Re: Subsequent Notification
Bluegrass Labels Company, Llc
NCR000000315

Dear Facility Contact:

The North Carolina Hazardous Waste Section has received a Subsequent Notification from your facility. Our office has accepted and processed the changes as noted. Attached is a RCRA Site Detail Report for your review to ensure that the information is accurate. Please notify our office if additional changes need to be made. If you have any questions or need additional assistance, please call Larry Wilson at (919) 508-8573.

Sincerely,

Elizabeth W. Cannon, Chief
Hazardous Waste Section

cc: Central Files



