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DENR - FAYETTEVILLE REGIONAL OFFICE

May 19, 2015

P. Sean Boyles, P.G.
Division of Waste Management
North Carolina Department of Environment and Natural Resources
Fayetteville Regional Office
225 Green Street, Suite 714
Fayetteville, NC 28301

Re: Planters Chemical
Fayetteville, Cumberland County, NC
NONCD0002909

Dear Mr. Boyles:

I am writing in response to your letter of May 13, 2015 stating that the Hazardous Sites Branch never received a response from Elementis. Elementis did in fact send a response (attached) on November 18, 2014. In our response, we convey that Elementis Specialty Products is not the successor to Planters Chemical and has never had any connection to the Fayetteville Site.

For the reasons stated in the May 13, 2015 letter, Elementis Specialty Products declines to participate in the voluntary party site cleanup program with respect to the Fayetteville Site. Also, for these reasons, Elementis Specialty Products is not submitting responses to the Site Conditions Questionnaire.

Please feel free to contact me if you have any additional questions.



Susan Shaw
Legal Operations Manager

Elementis Global LLC

469 Old Trenton Road
East Windsor, New Jersey
08512USA

Attachment

ELEMENTIS

November 18, 2014

P. Sean Boyles, P.G.
Division of Waste Management
North Carolina Department of Environment and Natural Resources
Fayetteville Regional Office
225 Green Street, Suite 714
Fayetteville, NC 28301

Re: Planters Chemical
Fayetteville, Cumberland County, NC
NONCD0002909

Dear Mr. Boyles:

I am writing in response to your letter of October 27, 2014 concerning a site located at 616 Commerce Street, Fayetteville, North Carolina (the "Fayetteville Site").

Elementis Specialty Products is not the successor to Planters Chemical. Further, Elementis Specialty Products has never had any connection to the Fayetteville Site.

Elementis Chemicals, Inc. (an affiliate of Elementis Specialty Products) purchased certain assets from the Thompson-Hayward Chemical Company in 1981. But the Fayetteville Site was not one of the assets involved in the transaction.

Moreover, Elementis Chemicals did not purchase Thompson-Hayward's pesticide business. As part of the 1981 transaction, Elementis Chemicals obtained the right to use the Thompson-Hayward name, but the former Thompson-Hayward continued to operate its pesticide business using a different name.

For these reasons, Elementis Specialty Products declines to participate in the voluntary party site cleanup program with respect to the Fayetteville Site. Also, for these reasons, Elementis Specialty Products is not submitting responses to the Site Conditions Questionnaire.

Please feel free to contact me if you have any additional questions.

Sincerely,



Walker Allen
General Counsel

469 Old Trenton Road
East Windsor, New Jersey
08512 USA