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Newark, New Jersey 07102-5310
(973) 596-4500
Attorney for Third-Party Defendant
Innospec Active Chemicals, LLC

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION and THE ADMINISTRATOR OF THE NEW JERSEY SPILL COMPENSATION FUND,	:	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: ESSEX COUNTY
	:	DOCKET NO. L-9868-05 (PASR)
	:	
Plaintiffs	:	
v.	:	CIVIL ACTION
	:	
OCCIDENTAL CHEMICAL CORPORATION, TIERRA SOLUTIONS, INC., MAXUS ENERGY CORPORATION, REPSOL YPF, S.A., YPF, S.A., YPF HOLDINGS, INC. and CLH HOLDINGS, INC.,	:	CMO V THIRD-PARTY INITIAL DISCLOSURE ON BEHALF OF INNOSPEC ACTIVE CHEMICALS, LLC
	:	
Defendants.	:	
	:	
MAXUS ENERGY CORPORATION and TIERRA SOLUTIONS, INC.,	:	
	:	
Third-Party Plaintiffs,	:	
	:	
v.	:	
	:	
3M COMPANY, <i>et al.</i> ,	:	
	:	
Third-Party Defendants.	:	

Comes now Third-Party Defendant Innospec Active Chemicals, LLC (“Innospec”), and for its Initial Disclosure in accordance with Case Management Order V provides the following specific information:

Reservations

1. Innospec reserves the right to object to the production of any documents or other information on any ground, including relevance and undue burden, and to assert any applicable privilege, including the attorney-client privilege, the work product doctrine, the common interest doctrine, and any other applicable privilege or protection. These disclosures are not intended to prejudice or waive any privileges or objections Innospec may have with respect to any outstanding or subsequent requests for discovery.

2. Innospec's investigation in this matter is continuing. Accordingly, it reserves the right to supplement, clarify, and revise these disclosures to the extent additional information becomes available or is obtained through discovery. Further, Innospec reserves the right to amend these disclosures to the extent the claims brought by or alleged against Innospec in this litigation are amended.

3. The time period covered by the allegations in the Plaintiffs' Second Amended Complaint is quite long and encompasses at least six decades. The geographic scope of the Second Amended Complaint is also quite broad, covering the 'Newark Bay Complex,' which spans the 'lower 17 miles of the Passaic River, Newark Bay, the lower reaches of the Hackensack River, the Arthur Kill, the Kill van Kull, and into adjacent waters and sediments.' Second Amended Complaint, ¶ 1. The scope of inquiry required by Plaintiffs and Third-Party Defendants is accordingly quite broad and potentially burdensome. Innospec is therefore engaged in a continuing investigation and reserves the right to supplement and modify these disclosures.

Initial Disclosures

a. The name, address and telephone number, as may be known of each individual likely to have discoverable information, along with the subjects of that information, that relates to any alleged discharge or release of pollutants, contaminants and/or hazardous substances (“Pollutants”) into the Newark Bay Complex (as these terms are defined in the Second Amended Complaint and the Third-Party Complaints) from the site(s) and/or properties with which the disclosing party is associated in the Third-Party Complaint (“Alleged Discharges”);

Response

Defendant-Third Party Plaintiffs Tierra Solutions, Inc. and Maxus Energy Corporation (collectively, “TPPs”) allege that discharges of hazardous substances to and from the Innospec Site were transported into Fleisher Brook and thence into the Passaic River, which TPPs allege is part of the Newark Bay Complex. Innospec denies that any Pollutants that may have been discharged or released at the Innospec Site were transported to or impacted the Newark Bay Complex. Accordingly, Innospec does not have knowledge of any individual likely to have discoverable information relating to alleged discharge of Pollutants into or affecting the Newark Bay Complex.

However, in a good faith effort to comply with CMO V, Innospec is disclosing the following individuals who may have discoverable information relating to the Innospec Site and remedial activities at the Innospec Site. This identification is not an admission that such persons have information relating to any Alleged Discharges, and no applicable privileges, doctrines, defenses, or protections should be deemed waived concerning these individuals or the entities with which they are associated. Innospec reserves the right to amend this list as more specific information regarding the nature and basis of Third Party Plaintiffs’ claims becomes available.

Innospec requests that notice be provided in writing to undersigned counsel before any current or former employees or consultants of Finetex, Octel, or Innospec are contacted.

NAME/TITLE/COMPANY	LAST KNOWN ADDRESS/PHONE	SUBJECT
Andrew Hartley, General Counsel EMEA and AsPac, Innospec Inc.	Innospec Manufacturing Park Oil Sites Road, Ellesmere Port Cheshire, CH65 4EY, UK +44 (0) 151 355 3611	Remediation activities on-site
Phillip Matena, Vice President Sales & Business Development Innospec Active Chemicals, LLC	397 Thornall Street 2nd Floor Edison NJ 08837 732- 321-3500	Remediation activities on-site

Bruce McDonald, Innospec Active Chemicals, LLC	397 Thornall Street 2nd Floor Edison NJ 08837 732- 321-3500	Remediation activities on-site
Emmett Kirby Atwood, Jr., Compliance Coordinator, Finetex, Inc.	P.O. Box 164 Spencer, NC 28159 704-633-8028	Remediation activities on-site
Robert Burges, Vice President, Finetex, Inc.	1025 Timberline Circle Salisbury, NC 28146	Remediation activities on-site
Alexander Goldberg, Director of Sanitation, Finetex, Inc.	P.O. Box 216 Elmwood Park, NJ 07407 201-797-4686	Remediation activities on-site
Jack Heath, Finetex, Inc.	147 Eastridge Court Advance, NC 27006	Remediation activities on-site
John Honn, Finetex, Inc.	P.O. Box 216 Elmwood Park, NJ 07407 201-797-4686	Remediation activities on-site
J. Roger Porter, Finetex, Inc.	P.O. Box 216 Elmwood Park, NJ 07407 201-797-4686	Remediation activities on-site
Thomas L. Scala, President, Finetex, Inc.	203 Stephens Rd West Milford, NJ 07480	Remediation activities on-site
T. Scaza, Plant Manager, Finetex, Inc.	P.O. Box 216 Elmwood Park, NJ 07407 201-797-4686	Alleged Sperm Oil Spill
Jim Scialabba, Quality Assurance Manager, Finetex, Inc.	P.O. Box 216 Elmwood Park, NJ 07407 201-797-4686	Alleged Neodol spill
Ismail Walele, Finetex, Inc.	P.O. Box 216 Elmwood Park, NJ 07407 201-797-4686	Alleged Neodol spill
Dr. William N. Knopka, Octel America, Inc.	5300 Woodbridge Forest Trail, Atlanta, GA 770-952-7519	Remediation activities on-site
Robert E. Loveall, Octel America, Inc.	5300 Woodbridge Forest Trail, Atlanta, GA 770-952-7519	Remediation activities on-site

John M. Brennan, Brennan Environmental, Inc.	19 Chatham Road Summit, NJ 07901 908-918-1702	Remediation activities on-site
Robert Dooley, Senior Environmental Scientist, Brennan Environmental, Inc.	19 Chatham Road Summit, NJ 07901 908-918-1702	Remediation activities on-site
John C. Hernandez, Project Manager, Brennan Environmental, Inc.	19 Chatham Road Summit, NJ 07901 908-918-1702	Remediation activities on-site
Jeff McCurdy, Environmental Scientist, Brennan Environmental, Inc.	19 Chatham Road Summit, NJ 07901 908-918-1702	Remediation activities on-site
Keven Ziegler, Project Manager, Brennan Environmental, Inc.	19 Chatham Road Summit, NJ 07901 908-918-1702	Remediation activities on-site
Frank Ocasio, Clean Venture, Inc.	201 South First Street Elizabeth, NJ 07206 908-355-5800	Remediation activities on-site
Gary Parr, Clean Venture, Inc.	201 South First Street Elizabeth, NJ 07206 908-355-5800	Remediation activities on-site
Kevin Perez, Clean Venture, Inc.	201 South First Street Elizabeth, NJ 07206 908-355-5800	Remediation activities on-site
John Pescatore, Clean Venture, Inc.	201 South First Street Elizabeth, NJ 07206 908-355-5800	Remediation activities on-site
Eric Smith, Clean Venture, Inc.	201 South First Street Elizabeth, NJ 07206 908-355-5800	Remediation activities on-site
J. Wellins, Clean Venture, Inc.	201 South First Street Elizabeth, NJ 07206 908-355-5800	Remediation activities on-site
Helen Ellis, Cycle Chem, Inc.	201 South First Street Elizabeth, NJ 07206 908-355-5800	Remediation activities on-site
Alicia Gibson, Cycle Chem, Inc.	201 South First Street Elizabeth, NJ 07206 908-355-5800	Remediation activities on-site
Joe Abell, Driller, Environmental Probing Investigations	16 Hornerstown Road Cream Ridge, NJ 08514 1-800-977-7623	Remediation activities on-site
Ron Higgins, Driller, Environmental Probing Investigations	16 Hornerstown Road Cream Ridge, NJ 08514 1-800-977-7623	Remediation activities on-site

Brian Kokol, Driller, Environmental Probing Investigations	16 Hornerstown Road Cream Ridge, NJ 08514 1-800-977-7623	Remediation activities on-site
Gary Wisniewski, Delta Consultants	8008 Corporate Center Dr. Suite 100 Charlotte, NC 28226 800-477-7411	Environmental due diligence
Michael H. Leftin, Ph.D., Lab Director, Integrated Analytical Laboratories, LLC	273 Franklin Road, Randolph, NJ 07869 973 361 4252	Remediation activities on-site
Jim Lowell, Integrated Analytical Laboratories, LLC	273 Franklin Road, Randolph, NJ 07869 973 361 4252	Remediation activities on-site
Nick Kins, Technical Director, Jersey Analytical Service, Inc.	3 Maple Ave. Andover, NJ 07821 201-786-6191	Remediation activities on-site
John Kosciolk, Jr., Assistant Regional Manager, HMHTTC	P.O. Box 5215 Parsippany, NJ 07054 973-335-6696	Alleged September 14, 2000 Spill
Pete Dudley, S&S Subsurface Investigations	24 Hagerty Blvd, Suite 11 West Chester, PA 19382 1-800-545-1531	Remediation activities on-site
Art Salvatore, S&S Subsurface Investigations	24 Hagerty Blvd, Suite 11 West Chester, PA 19382 1-800-545-1531	Remediation activities on-site
Todd Naugle, Driller, Summit Drilling	Chimney Rock Road, Building 9W Bound Brook, NJ 08805 800-242-6648	Remediation activities on-site
John Voit, Driller, Summit Drilling Co.	Chimney Rock Road, Building 9W Bound Brook, NJ 08805 800-242-6648	Remediation activities on-site
Tony Altieri, Supervising Environmental Technician, NJDEP	Unknown	Remediation activities on-site
Armando Arcenal, Environmental Engineering Trainee, NJDEP	Unknown	Remediation activities on-site
Richard Bellis, NJDEP	Unknown	Remediation activities on-site
Lisa Besler, Technician, MIS Bureau of Financial Management, NJDEP	Unknown	Remediation activities on-site

James J. Bono, Supervisor, Application Unit, ISRA, NJDEP	401 E. State St. Trenton, NJ 08608 609-633-1434	Remediation activities on-site
Ann Brown, Sr. Tech, MIS, Bureau of Permit Administration, NJDEP	Unknown	Remediation activities on-site
Michael Buriani, Supervisor, Bureau of Northern Case Management, NJDEP	401 E. State St. Trenton, NJ 08608 609-633-1425	Remediation activities on-site
Comfort Caulper, Case Manager, NJDEP	Unknown	Remediation activities on-site
Gary Christensen, Sr. Environmental Specialist, Bureau of Permit Administration, NJDEP	Unknown	Remediation activities on-site
Jeannette Cleary, Case Manager, Bureau of Field Operations, ISRA, NJDEP	401 E. State St. Trenton, NJ 08608 609-633-1428	Remediation activities on-site
Matt Conley, Inspector, NJDEP	Unknown	Remediation activities on-site
Ronald T. Corcory, Assistant Director, Enforcement and Assessment Element, NJDEP	401 E. State St. Trenton, NJ 08608 609-633-1480	Remediation activities on-site
Laura Fonde, Bureau of Emergency Response, Region I, NJDEP	973-631-6389	Alleged Neodol spill
George C. Friedel, Acting Director, Division of Water Resources, NJDEP	Unknown	Remediation activities on-site
Josh Gradwohl, Bureau of Field Operations, NJDEP	401 E. State St. Trenton, NJ 08608 609-292-0408	Remediation activities on-site
James K. Hamilton, Administrator, Water Compliance and Enforcement Element, NJDEP	401 E. State St. Trenton, NJ 08608 609-984-5855	Remediation activities on-site
Debra Hammond, Bureau of Financial Management, NJDEP	401 E. State St. Trenton, NJ 08608 609-777-1753	Remediation activities on-site
Thomas F. Harding, Supervisor of Industrial Containment, NJDEP	Unknown	Remediation activities on-site

Thomas B. Harrington, Field Operations Supervisor, Region I, Enforcement Element, NJDEP	(now listed with the Criminal Justice unit of the NJ State Government) 609-631-4704	Remediation activities on-site
Dennis Hart, Administrator of Wastewater Facility Regulation Program, NJDEP	401 E. State St. Trenton, NJ 08608 609-219-8600	Remediation activities on-site
Dr. Shing-Fu Hsueh, Chief of the Bureau of Water Quality Analysis, NJDEP	Unknown	Remedial activities on-site
Carol Hurtig, Bureau of Collections and Licensing, NJDEP	Unknown	Remediation activities on-site
Mohammed Hussain, NJDEP	401 E. State St. Trenton, NJ 08608 609-984-4080	Remediation activities on-site
Grace Jacobs, NJDEP	Unknown	Remediation activities on-site
Walter Janicek, Bureau of Emergency Response, Region I, NJDEP	Unknown	Alleged Neodol spill
Tina Layre, NJDEP	401 E. State St., Trenton, NJ 08608 609-292-0989	Remediation activities on-site
Peter T. Lynch, Chief, Enforcement, Metro Region, NJDEP	Unknown	Remediation activities on-site
Rebecca J. Manis, Metro Bureau of Water and Hazardous Waste Enforcement, NJDEP	Unknown	Remediation activities on-site
Stacy Marinos, Technical Reviewer, NJDEP	Unknown	Remediation activities on-site
Maurice Migliarano, Regional Northern Case Manager, NJDEP	(Listed as Maurizio Migliarino in directory) 401 E. State St. Trenton, NJ 08608 609-633-1424	Remediation activities on-site

Joseph M. Mikulka, Chief, Northern Bureau of Water Compliance and Enforcement, NJDEP	Unknown	Remediation activities on-site
Robert Oberthaler, Chief, Bureau of Industrial Discharge Permits, Wastewater Facility Regulation Program, NJDEP	Unknown	Remediation activities on-site
Gary Pearson, Region Supervisor, NJDEP	973-631-6387	Alleged Neodol spill
Mark J. Pedersen, Bureau Chief, Bureau of Risk Management, Initial Notice and Case Assignment, NJDEP	401 E. State St. Trenton, NJ 08608 609-292-1928	Remediation activities on-site
Charles M. Pike, Director, Division of Water Resources, NJDEP	Unknown	Remediation activities on-site
Ellen Radow, Chief, Office of Permit Administration and Water Quality Management, NJDEP	Unknown	Remediation activities on-site
Robert J. Reed, Supervisor, Field Operations, Passaic- Hackensack Basin, Water Pollution Control MS and Enforcement Element, NJDEP	Unknown	Remediation activities on-site
Dwight Roskos, NJDEP	401 E. State St. Trenton, NJ 08608	Remediation activities on-site
Stephen Sedlak, Environmental Engineering Trainee, NJDEP	973-656-4099	Remediation activities on-site
Raymond Strassler, Bureau of Northern Case Management, NJDEP	401 E. State St. Trenton, NJ 08608 609-633-3656	Remediation activities on-site
Gloria Tandoi, Environmental Compliance Investigator, Region I, Enforcement Element, NJDEP	Unknown	Remediation activities on-site
R.S. Wharton, Environmental Compliance Investigator, NJDEP	Unknown	Remediation activities on-site

Helen V. Wright, Environmental Compliance Investigator, Metro Region, Enforcement Element, NJDEP	Unknown	Remediation activities on-site
Sgt. Kulas, NJ State Police	609-882-2000	Alleged Neodol spill
Neil Edsall, Bergen County HAZMAT	Unknown	Alleged Neodol Spill
Frank P. D'Ascensio, Manager of Industrial and Pollution Control, Passaic Valley Sewerage Commission	Unknown	Remediation activities on-site
W. Flemming, Passaic Valley Sewerage Commission	Unknown	Alleged Sperm Oil Spill
S.A. Lubetkin, Passaic Valley Sewerage Commission	Unknown	Remediation activities on-site
J. Perrapato, Passaic Valley Sewerage Commission	Unknown	Alleged Sperm Oil Spill
Hon. Richard A. Mola, Mayor of Elmwood Park Boro	Elmwood Park Municipal Building 182 Market Street Elmwood Park, NJ 07407 201-796-1457	Remediation activities on-site
Patrolman Joseph Barone, Elmwood Park Police Department	182 Market Street • Elmwood Park, NJ 07407 201-796-0700	Alleged Neodol Spill
Lt. Johnson, Elmwood Park Police Department	182 Market Street • Elmwood Park, NJ 07407 201-796-0700	Alleged Neodol spill
Chief Presler, Elmwood Park Fire Dept.	182 Market Street • Elmwood Park, NJ 07407 201-796-0700	Alleged Neodol spill
Deborah Ricci, Health Officer, Elmwood Park Health Dept.	182 Market Street Elmwood Park, NJ 07407 201-796-1072	Remediation activities on-site
Peter Anderson, USEPA	Unknown	Remediation activities on-site
Dr. Richard Baker, USEPA	Unknown	Remediation activities on-site
Guss J. Bennett, Director, Enforcement Division, USEPA	Unknown	Remediation activities on-site

Patrick Durack, United States Environmental Protection Agency	Unknown	Remediation activities on-site
Diane Gaughran, EPA Region II Permits Administration Branch	Room 432 26 Federal Plaza New York, NY 10278	Remediation activities on-site
Clifford R. Lundin, Environmental Protection Specialist, Status of Compliance Branch, Enforcement Division, USEPA	Unknown	Remediation activities on-site
Meyer Scolnick, Director of Enforcement and Regional Counsel Division, USEPA	Unknown	Remediation activities on-site
Richard G. Tisch, Chief, Water Enforcement Branch, USEPA	Unknown	Remediation activities on-site
Daniel Chung, Purchaser of 410, 416, and 418 Falmouth Avenue	Unknown	Remediation activities on-site
Wes Zion, Max-El Realty	65 Leliarts Lane, Elmwood Park, NJ	Remediation activities on-site
William P. Schemel, Land Surveyor	1658 Route 9, Toms River, NJ 08755 732-797-3100	Remediation activities on-site
Craig W. Alexander, Esq., Mandelbaum, Salsburg, Gold, Lazris, Discenza & Steinberg, P.C.	155 Prospect Avenue West Orange, NJ 07052 973-243-7926	Remediation activities on-site
Paul Dritsas, Esq., McCarter & English	Four Gateway Center 100 Mulberry Street Newark, NJ 07102 973.639.2063	Remediation activities on-site
Lawrence Jacobs, Esq., Farer Fersko	600 South Avenue P.O. Box 580 Westfield, NJ 07091 908-786-8550	Remediation activities on-site
Edward L. Burbank	Unknown	Remediation activities on-site
George Corporale	Unknown	Remediation activities on-site
A. Fuenning, East Paterson Citizen	Unknown	Alleged Sperm Oil Spill
Richard J. McManus, Director, Office of Legal Affairs	Unknown	Remediation activities on-site

Ed Post	Unknown	Remediation activities on-site
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b. The name, address and telephone number, as may be known, of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses (unless the use would be solely for impeachment);

Response:

Innospec is still engaged in a continuing investigation and has not determined who it may use to support its claims or defenses. However, some of the individuals identified in a., above, may be used.

c. The name, address and telephone number, as may be known, of any and all past or present owners, lessees or operators at the site(s) and/or properties with which it is associated in the Third-Party Complaint and the dates of such ownership, lease or operation, as may be known;

Response:

NAME/ADDRESS/PHONE	SITE ADDRESS	DATES AT SITE: OWNERSHIP
Daniel's Bethel, LLC 42 Almadera Drive, Wayne, NJ 07470	418 Falmouth Ave., Elmwood Park, NJ	From May 9, 2008
Innospec Active Chemicals LLC 379 Thornall Street Edison, NJ 08837	418 Falmouth Ave., Elmwood Park, NJ	Oct. 1, 2007-May 9, 2008
Innospec Performance Chemicals U.S. Co.(became Innospec Active Chemicals LLC)	418 Falmouth Ave. Elmwood Park, NJ	Dec. 31, 2006-Oct. 1, 2007
Innospec Holdings, Inc. (became Innospec Performance Chemicals U.S. Co.)	418 Falmouth Ave. Elmwood Park, NJ	Dec. 27, 2006-Dec. 31, 2006
Finetex, Inc. (became Innospec Holdings, Inc.)	418 Falmouth Ave. Elmwood Park, NJ	Jan. 13, 2005-Dec. 27, 2006
Wood Realty Company c/o J. Roger Porter 2601 Hammock Isle Court No. 202 Bonita Springs, FL 34134	418 Falmouth Ave. Elmwood Park, NJ	Jan. 2, 1977-Jan. 13, 2005
Robert Scala 37191 Black Velvet Lane Wadsworth, IL 60063	418 Falmouth Ave. Elmwood Park, NJ	Jan. 2, 1977-Jan. 13, 2005

Larue Porter 9 Elizabeth Lane West Paterson, NJ 07424	418 Falmouth Ave. Elmwood Park, NJ	Jan. 2, 1977-Jan. 13, 2005
Roger Porter, 2601 Hammock Isle Court No. 202 Bonita Springs, FL 34134	418 Falmouth Ave. Elmwood Park, NJ	Jan. 2, 1977-Jan. 13, 2005
Thomas L. Scala, 203 Stephens Rd West Milford, NJ 07480	418 Falmouth Ave. Elmwood Park, NJ	Mar. 4, 1954-Jan. 2, 1977

NAME/ADDRESS/PHONE	SITE ADDRESS	DATES AT SITE: OPERATION
Innospec Active Chemicals LLC 379 Thornall Street Edison, NJ 07470	418 Falmouth Ave., Elmwood Park, NJ	Oct. 1, 2007-May 9, 2008
Innospec Performance Chemicals U.S. Co. (became Innospec Active Chemicals LLC)	418 Falmouth Ave. Elmwood Park, NJ	Dec. 31, 2006-Oct. 1, 2007
Innospec Holdings, Inc. (became Innospec Performance Chemicals U.S. Co.)	418 Falmouth Ave. Elmwood Park, NJ	Dec. 27, 2006-Dec. 31, 2006
Finetex, Inc. (became Innospec Holdings, Inc.)	418 Falmouth Ave. Elmwood Park, NJ	1955-Dec. 27, 2006

d. With respect to any individual identified pursuant to paragraph (a), (b) or (c) above, (or any other individual known to have material knowledge of an alleged discharge or release of a Pollutant at or from a site and/or property, or into the Newark Bay Complex), any known inability to testify due to age, infirmity, or incompetency within 12 months following the date of the Initial Disclosure;

Response:

Innospec requests that notice be provided in writing to undersigned counsel before contacting Mr. Scala.

NAME/ADDRESS/PHONE	NATURE OF INABILITY
Robert Scala 37191 Black Velvet Lane Wadsworth, IL 60063	Mr. Scala is in ailing health.

e. A description by category and location (or copy at the discretion of the Third-Party Defendant) of all documents or electronically stored information that the disclosing party has in its possession, custody, or control with respect to Alleged Discharges including disclosure of the extent to which such documents or electronically stored information may fall within the Excepted Information.

Response

As noted in response to a. above, Innospec denies that any Pollutants that may have been discharged or released at the Innospec Site were transported to or impacted the Newark Bay Complex. Accordingly, Innospec does not have any documents with respect to Alleged Discharges. However, in good faith, Innospec provides the following description of documents that may relate to its claims or defenses:

DOCUMENTS BY CATEGORY	LOCATION	APPLICABLE EXCEPTION ¹
Administrative Orders/Complaints	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	A, B

¹ Applicable Exception Codes are as follows:

a. Information, (“Information”), including, but not limited to, environmental, chemical and/or biological testing of groundwater, surface water, soil or sediment (hereinafter "Sampling Information") contained in the nexus packages produced pursuant to paragraph 8 (e) of CMO V; and

b. Information previously produced to any branch, department, agency or instrumentality of the State of New Jersey including to the New Jersey Department of Environmental Protection (“NJDEP”) or Information produced to any other governmental agency or entity whose responsibility it is to oversee environmental compliance in the Newark Bay Complex Area, including, but not limited to, the United States Environmental Protection Agency and the United States Army Corps of Engineers (hereinafter “Governmental Recipients”);

c. Information produced to any Licensed Site Remediation Professional (hereinafter “LSRP”) who is duly licensed by the State of New Jersey at the time of receipt of such Information where such disclosure of Information is intended to be used in connection with any remedial investigation or remedial action having an assigned case number in the NJDEP’s NJEMS data system;

d. Sampling Information compiled with the expectation of being produced to a Governmental Recipient or an LSRP under Paragraphs 4(b) or 4(c) but which Sampling Information has not yet undergone quality assurance/ quality control or similar analysis;

e. Information produced by a third-party defendant to any third-party plaintiff pursuant to the New Jersey Open Public Records Act or other freedom of information law or regulation;

f. Information previously produced to Defendants and

g. Information that falls within the attorney-client privilege and/or the attorney work product privilege.

Correspondence and communications with or from consultants	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	A, B, G
Correspondence and communications with or from governmental and regulatory agencies and authorities	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	A, B
Correspondence and communications with or from outside counsel	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	G
Environmental permits, registrations, and certifications	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	B
Environmental reports, sampling plans and reports, presentations, maps, figures, laboratory documents, and drafts thereof	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	B
General compliance documentation, including but not limited to Community Right-to-Know surveys, self-monitoring reports, and material safety data sheets	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	B

Ground Water Monitoring Reports	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	B
ISRA General Information Notices	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	B
ISRA Remedial Investigation Workplans/Reports	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	B
Sampling Data	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	B, D
Transactional and related agreements, schedules, and exhibits, including drafts thereof	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	B

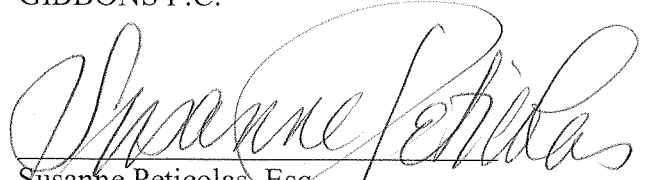
UST Closure Plans	Gibbons P.C., One Gateway Center, Newark, NJ 07102; Brennan Environmental, 19 Chatham Road Summit, NJ 07901	B
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Innospec's Initial Disclosures are made without prejudice to their right to change or supplement their responses, their right to assert privileges or objections with respect to any subsequent requests for discovery, and their right to introduce at trial additional evidence and documents as warranted by the development of the facts underlying this litigation.

Respectfully submitted,

GIBBONS P.C.

Dated: March 12, 2010



Susanne Peticolas, Esq.
One Gateway Center
Newark, New Jersey 07102-5310
Attorney for Third-Party Defendant
Innospec Active Chemicals, LLC