**Information Request Questions:
Arranger/Generator**

Instructions for use.

1. Throughout this list of questions, there are options for focusing on “materials” or “hazardous substances.” Depending on the stage of the enforcement process at the site and the characteristics of the respondent, the drafter will need to determine which phrase works best. For instance, if the site is in an early stage of the enforcement process and the Respondent is a relatively small company, the drafter may choose the broader term “materials” to learn as much about the site and the respondent as possible. However, if the drafter already has a lot of information about the site and the respondent is a large corporation, it would be best to narrow the scope of the questions and use “hazardous substances” to ensure EPA does not receive voluminous amounts of non-relevant material. In addition, if the drafter knows the specific hazardous substance at issue at the site, the drafter may want to insert that specific hazardous substance in these questions.

2. Note that some questions ask the respondent to provide related documents. For example, question 39 asks about the price of the contract and then asks the respondent to provide the contract. Contracts are also requested in question 7. However, some questions do not request the respondent to provide related documents. Please pay attention to each question and determine whether it would be productive, based on available resources, to ask for these additional documents. If a specific document would help your enforcement case, explicitly ask the respondent for the document.

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# DEFINITIONS

The following definitions shall apply to the following terms as they appear in the information request.

“Agreement” means every separate contract, transaction, or invoice, whether written or oral.

The terms “and” and “or” shall be construed either disjunctively or conjunctively, as necessary, to bring within the scope of this request any information which might otherwise be construed to be outside its scope.

“CERCLA” shall mean the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9601-9675*.*

“CWA” shall mean the Clean Water Act (the Federal Water Pollution Control Act), 33 U.S.C. §§ 1251 et seq.

“Disposal” shall mean the discharge, deposit, injection, dumping, spilling, leaking, or placing of any material and/or hazardous substance into or on any land or water so that such material and/or hazardous substance or any constituent thereof may enter the environment or be emitted into the air or discharged into any waters, including ground waters.

“Documents” includes any written, recorded, computer-generated, or visually or orally reproduced material of any kind in any medium in Respondent’s possession, custody, or control, or known by Respondent to exist, including originals, all prior drafts, and all non-identical copies.

“Environment” shall have the same definition as that contained in Section 101(8) of CERCLA, and includes (A) the navigable waters, the waters of the contiguous zone, and the ocean waters of which the natural resources are under the exclusive management authority of the United States under the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C.A §§ 1801 et seq., and (B) any other surface water, ground water, drinking water supply, land surface or subsurface strata, or ambient air within the United States or under the jurisdiction of the United States.

“EPA” shall mean the United States Environmental Protection Agency and its successor departments, agencies, or instrumentalities.

“EPCRA” shall mean the Emergency Planning and Community Right-to-Know Act,
42 U.S.C. §§ 11001 et seq.

“Facility” shall have the same definition as that contained in Section 101(9) of CERCLA, and includes (A) any building, structure, installation, equipment, pipe or pipeline (including any pipe into a sewer or publicly owned treatment works), well, pit, pond, lagoon, impoundment, ditch, landfill, storage container, motor vehicle, rolling stock, or aircraft, or (B) any site or area where a hazardous substance has been deposited, stored, disposed of, or placed, or otherwise come to be located; but does not include any consumer product in consumer use or any vessel.

“Hazardous Substance” or “Hazardous Substances” shall have the same definition as that contained in Section 101(14) of CERCLA, and includes any mixtures of such hazardous substances with any other substances, including mixtures of hazardous substances with petroleum products or other nonhazardous substances.

“Identify” means:

* 1. With respect to a natural person, state: (a) the person's full name; (b) present or last known business and home addresses, telephone numbers, and email addresses; and (c) present or last known employer (include full name and address) with title, position or business.
	2. With respect to a corporation, partnership, or other business entity (including a sole proprietorship), the term “identify” means to provide its full name, address, and affiliation with the individual and/or company to whom/which this request is addressed.

“Material” or “Materials” shall mean any and all objects, goods, products, by-products, substances, or matter of any kind, including but not limited to wastes.

“Person” shall have the same definition as that contained in Section 101(21) of CERCLA, and includes an individual, firm, corporation, association, partnership, consortium, joint venture, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body.

“RCRA” shall mean the Solid Waste Disposal Act, 42 U.S.C. §§ 6901-6992 (also known as the Resource Conservation and Recovery Act).

“Release” shall have the same definition as that contained in Section 101(22) of CERCLA, and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including but not limited to the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.

“Respondent” shall mean [**name of individual, small business, firm, unincorporated association, partnership, corporation, company, trust, or other entity**] and if applicable, each parent, subsidiary, affiliate, predecessor and successor of Respondent that owned or operated any of Respondent’s plants or facilities. **[Additional language for small business: The term “you” also includes any officers, managers, employees, contractors, trustees, successors, assigns, and agents of [name of small business].]**

“Site” shall mean the [**Site name**] Superfund Site located at [**address of the site**].

“Treatment” and “Treat” shall mean any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological character or composition of any material and/or hazardous substance so as to neutralize such material and/or hazardous substance or so as to render such material and/or hazardous substance nonhazardous, safer for transport, amenable for recovery, amendable for storage, or reduced in volume. Such terms include any activity or processing designed to change the physical form or chemical composition of a material and/or hazardous substance so as to render it nonhazardous.

“TSCA” shall mean the Toxic Substances Control Act, 15 U.S.C. §§ 2601 et seq.

“Waste” or “Wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

“Waste Carriers” shall mean persons who picked up hazardous substances from Respondent or who otherwise transported hazardous substances away from Respondent's Facility.

# RESPONDENT’S OPERATIONS

1. Provide the correct name and addresses of Respondent’s plants and other facilities where Respondent carried out its operations (excluding locations where ONLY clerical/office work was performed).
2. Provide a schematic diagram or flow chart that fully describes and/or illustrates the Respondent's operations at each of Respondent’s plants and facilities.
3. Provide a brief description of the nature of Respondent's operations at each plant or facility including:
	1. the date such operations commenced and concluded; and
	2. the types of work performed at each plant or facility, including but not limited to the industrial, chemical, or institutional processes and treatments undertaken at each plant or facility.
4. If the nature or size of Respondent's operations changed over time, describe those changes and the dates they occurred.
5. How did Respondent come to possess the **[materials or hazardous substances]** that came to be located at the Site?
6. List all persons from whom Respondent acquired any **[material or hazardous substance]** used, generated, treated, stored, or disposed of during Respondent’s operations.
7. Provide copies of all contracts, agreements, waste logs, journals, notes, or any other written material related to your transactions with any parties identified in your responses to questions 5 and 6.
8. What was the monthly or annual quantity of **[materials or hazardous substances]** that Respondent generated, acquired, or came to possess?
9. List all **[materials or hazardous substances]** used, generated, treated, stored, disposed of, manufactured, recycled, recovered, treated, or otherwise processed during Respondent's operations at any facility or vessel.
10. Provide copies of Material Safety Data Sheets (MSDS) for materials used in Respondent's operations.
11. Describe all of Respondent’s actions to manage, store, or dispose of any **[material or hazardous substance]** you acquired for your operations.
	1. What costs were incurred by Respondent for these actions?
12. Describe all actions taken by Respondent to inspect its **[materials or hazardous substances]**?
	1. Describe how they were inspected.
	2. Describe how often they were inspected.
	3. If available, provide the results of any inspections identified in response to this question.
	4. Identify the individuals and their positions responsible for storing, maintaining, and inspecting the **[material or hazardous substance]**.
13. Were the **[materials or hazardous substances]** treated at Respondent’s Facility?
	1. What treatment process(es) took place?
	2. What was the result?
14. Were the **[materials or hazardous substances]** separated (e.g., physically or chemically) from other materials at Respondent’s Facility?
	1. If so, what was done with the **[material or hazardous substance]** once it was separated?
	2. In what kinds of situations or scenarios were the **[material or hazardous substance]** separated from other materials?
	3. If the **[material or hazardous substance]** was separated or could have been separated from other **[materials or hazardous substances]**, explain why, and provide in detail the process of separating the material. Include the cost, if any, of this separation process, and what was done with the **[material or hazardous substance]**.
	4. If the **[materials or hazardous substances]** could feasibly be separated from other materials, but Respondent did not separate out the **[materials or hazardous substances]** explain why the **[materials or hazardous substances]** were not separated.
15. Were the **[materials or hazardous substances]** mixed or combined with non-hazardous substances?
	1. Did the **[materials or hazardous substances]** need to be used in conjunction with non-hazardous substances?
	2. Did the **[materials or hazardous substances]** ever lose their usefulness?
16. Describe how each type of **[material or hazardous substance]** was collected and stored at Respondent's Facility prior to disposal/recycling/sale/transport, including:
17. the type of container in which each type of **[material or hazardous substance]** was placed/stored; and
18. where each type of **[material or hazardous substance]** was collected and stored.
19. List all settling tank, septic system, or pretreatment system sludges or other treatment wastes resulting from Respondent's operations.
20. List and fully describe all waste streams produced by the Respondent’s operations, including solid, liquid, or any other type of waste.
21. Describe in detail the handling, storage, and disposal practices by Respondent for each waste stream resulting from Respondent’s operations.
22. Describe any leaking of any **[materials or hazardous substances]** generated, used, stored, or treated at any vessel or facility where Respondent operated.
23. Describe all **[material or hazardous substance]** disposed of by Respondent into Respondent's drains including but not limited to:
	1. the nature and chemical composition of each type of waste;
	2. the dates on which those wastes were disposed;
	3. the approximate quantity of those wastes disposed of by month and year;
	4. the location to which these wastes drained (e.g., on-site septic system, on-site storage tank, pre- treatment plant, Publicly Owned Treatment Works (POTW), etc.); and
	5. whether and what pretreatment was provided.
24. Describe the cleaning and maintenance of the equipment and machinery of Respondent’s operations, including but not limited to:
	1. the types of materials used to clean/maintain Respondent’s equipment/machinery;
	2. the monthly or annual quantity of each such material used;
	3. the methods used to clean the equipment and machinery; and
	4. where the cleaning materials were disposed of.
25. Describe the methods used to clean up spills of liquid or solid materials during Respondent's operation, including but not limited to:
	1. the types of materials spilled in Respondent's operations;
	2. the quantity of materials spilled; and
	3. where the materials used to clean up those spills were disposed of.
26. Identify, describe, and provide all documents regarding the steps Respondent or other persons took to reduce any spillage, leakage, or placement of **[materials or hazardous substances]** into the environment.
	1. Identify any operational manuals or policies (e.g.,a facility’s spill control policy) which address the management of spills and leaks.

# RESPONDENT’S BY-PRODUCTS

1. For each type of by-product from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:
2. physical state,
3. nature and chemical composition,
4. color,
5. odor,
6. approximate monthly and annual volumes of each by-product (using such measurements as gallons, cubic yards, pounds, etc.), and
7. dates (beginning & ending) during which each by-product was produced by Respondent's operations.
8. List and describe the nature and composition of all by-products generated by Respondent’s operations.

# RESPONDENT'S HANDLING AND MANAGEMENT OF [MATERIALS OR HAZARDOUS SUBSTANCES]

1. Identify all individuals who currently have and those who have had responsibility for Respondent's environmental matters (e.g., responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's **[materials or hazardous substances]**).
	1. Provide each individual's job title, duties, dates performing those duties, supervisors for those duties, current position, and if applicable, the date of the individual’s resignation or termination.
	2. Provide the nature of the information possessed by such individuals concerning Respondent's waste management.
2. List and describe, and provide all documents that refer or relate to:
	1. The precise locations, addresses, and names of the facilities where disposal, treatment, storage, recycling, unloading, management, or handling of the **[material or hazardous substance]** occurred.
	2. Provide the official name of the facilities and a description of the facilities where each **[material or hazardous substance]** involved in such transactions was actually disposed of or treated.
	3. If the locations or facilities of such disposal, treatment, storage, recycling, unloading, management or handling are different locations or facilities than what was originally intended, provide all documents that relate and/or refer to why the substances came to be located at the different location or facility.
	4. All intermediate sites where the **[material or hazardous substance]** involved in each arrangement were transferred, or where they were stored or held, any time prior to final treatment or disposal.
	5. Locations where the **[materials or hazardous substances]** were transferred to other than the Site.
3. Did Respondent send or arrange to send **[materials or hazardous substances]** to any third parties for treatment?
	1. If so, identify the third party and the dates the **[materials or hazardous substances]** were sent for treatment, where they were sent for treatment, what treatment processes took place, the result of the treatment process (including where the **[materials or hazardous substances]** were sent after being treated), and the disposition of the **[materials or hazardous substances]**.
4. Describe the containers used to transfer each **[material or hazardous substance]** from Respondent's operation, including but not limited to:
	1. the type of container (e.g., 55 gallon drum, dumpster, etc.);
	2. the colors of the containers;
	3. any distinctive stripes or other markings on those containers;
	4. any labels or writing on those containers (including the content of those labels);
	5. whether those containers were new or used; and
	6. if those containers were used, a description of the prior use of the containers.
5. Apart from contracting for disposal through another entity or party, did Respondent ever dispose of hazardous substances?
	1. If so, describe in detail the circumstances of Respondent’s disposal, including what was disposed, when the disposal(s) took place, where the substances were disposed, and the quantity, amount, or volume disposed. Include any documentation relating to such disposal.
6. Identify any sewage authority or treatment works to which Respondent's **[material or hazardous substance]** was sent.
7. With respect to its materials containing hazardous substances, explain what Respondent does with these materials if Respondent cannot find a buyer to purchase such material, including all methods of use, handling, treatment, sale, recycling, and disposal, and how much Respondent paid or received for each such method.

# PARTIES INVOLVED IN THE TRANSFER, TREATMENT AND DISPOSAL OF [MATERIALS OR HAZARDOUS SUBSTANCES]

1. Identify all persons, including Respondent, who may have received the **[materials or hazardous substances]** or entered into an agreement for the transfer, handling, disposal, treatment or transportation of the **[materials or hazardous substances]** at or to the Site **[or any transshipment site]**.
	1. Provide all documents relating to question 34.
2. Identify all persons who controlled and/or transported the **[materials or hazardous substances]** prior to delivery to the Site?
3. Provide all documents relating to question 35.
4. Provide agreements and documents, including waste logs, journals, or notes, showing the times when each party possessed the **[materials or hazardous substances]**.
5. Identify all owner(s) or possessor(s) (persons in possession) of the **[materials or hazardous substances]** involved in each agreement for the transfer, disposal, or treatment of the **[materials or hazardous substances]**.
	1. If the ownership(s) changed, when did this change(s) occur?
	2. Provide documents, including agreements, waste logs, journals, or notes, describing this change of ownership, including the date of change, persons involved in the change, reason for the change of ownership, and details of the agreement(s) such as contracts, agreements, etc.
	3. If Respondent did not own the **[materials or hazardous substances]** when shipped, who did own them and how did Respondent come to own or possess the **[materials or hazardous substances]**?
	4. Provide all documents relating to question 36.
6. Identify all persons that selected the location where the **[materials or hazardous substances]** were to be transferred, disposed of, or treated?
	1. Provide all documents relating to question 37.

# TRANSACTIONAL DOCUMENTS

1. For each type of **[material or hazardous substance]**, describe Respondent's agreements or other arrangements for its disposal, treatment, storage, recycling, or sale.
	1. Provide any agreement and document, including waste logs, journals, or notes, related to any transfer of **[materials or hazardous substances]** from Respondent’s Facility that came to be located at the Site.
	2. Provide all correspondence and written communications, including but not limited to emails, between Respondent and each owner/operator of the Site regarding the Respondent’s **[materials or hazardous substances]** that came to be located at the Site.
2. List any amount paid by Respondent, and other persons in connection with each transaction for any arrangement identified in question 38 above, the method of payment, and the identity of the persons involved.
	1. Provide any documentation memorializing the costs and payments.
3. List any amount of money received by Respondent and other persons for the sale, transfer, or delivery of any material containing hazardous substances.
	1. If the material was repaired, refurbished, or reconditioned, how much money was paid for this service?
4. Was the price of any transaction reduced because of the inclusion of hazardous substances among the materials transferred?
	1. If so, by how much?
5. Was there a shrinkage/spillage provision or loss allowance in the agreement, or an understanding outside of the agreement?
	1. As a part of the transaction, was there any penalty for shrinkage, spillage, or loss?
	2. Did the agreement acknowledge that spills would occur?
6. Did Respondent tell the owner(s) and/or operator(s) of the Site about any hazardous substances being sold, transferred or delivered?
	1. Were hazardous substances specifically mentioned in the transactional documents?
	2. If so, what information was provided? When was this information provided? To whom was this information provided?
7. Did Respondent sell or transfer the **[materials or hazardous substances]** to other locations besides the Site?
	1. If so, provide any agreements and documents, including waste logs, journals, or notes, related to the transfer of the **[materials or hazardous substances]** from Respondent’s Facility to locations other than the Site.
8. Did Respondent consider transferring the **[materials or hazardous substances]** to other locations besides the Site?
	1. If so, provide the addresses of the other locations.
9. Did Respondent consider transferring the **[materials or hazardous substances]** through a disposal company?
	1. Did Respondent receive estimates for disposing of the **[materials or hazardous substances]** through parties other than those who transported the **[materials or hazardous substances]** to the Site?
	2. If so, how much would it have cost to dispose of the **[materials or hazardous substances]**?
10. Did Respondent ever request from the buyer that hazardous substances **[or components of the materials that contained hazardous substances]** be returned to Respondent after buyer’s use of the product **[or other non-hazardous components]** had finished or otherwise ceased?
	1. If so, explain the details of such transaction(s). Provide any documentation relating to any return to Respondent of hazardous substances.
11. Provide agreements and documents, including waste logs, journals, or notes, that include the following:
12. Where Respondent sent each type of **[material or hazardous substance]** for disposal, treatment, or recycling.
13. List all Waste Carriers used by Respondent.
14. For each type of **[material or hazardous substance]**, specify which Waste Carrier picked it up.
15. For each type of **[material or hazardous substance]**, state how frequently each Waste Carrier picked up such waste.
16. For each type of **[material or hazardous substance]**, provide the volume picked up by each Waste Carrier (per week, month, or year).
17. For each type of **[material or hazardous substance]**, identify the dates (beginning & ending) such waste was picked up by each Waste Carrier.
18. Describe the vehicles used by each Waste Carrier to haul away each type of **[material or hazardous substance]**, including but not limited to the:
	* 1. type of vehicle (e.g., flatbed truck, tanker truck, containerized dumpster truck);
		2. names or markings on the vehicles; and
		3. color of such vehicles.
19. Identify all of each Waste Carrier's employees who collected Respondent's **[material or hazardous substance]**.
20. Indicate the ultimate location for each type of **[material or hazardous substance]**.
	1. Provide all documents indicating the ultimate disposal/recycling/treatment location for each type of **[material or hazardous substance]**.
21. Describe how Respondent managed pickups of each **[material or hazardous substance]**, including but not limited to the:
22. method for inventorying each type of **[material or hazardous substance]**;
23. method for requesting each type of **[material or hazardous substance]** to be picked up;
24. identity of the Waste Carrier employee/agent contacted for pickup of each type of **[material or hazardous substance]**;
25. amount paid or the rate paid for the pickup of each type of **[material or hazardous substance]**;
26. identity of Respondent's employee who paid the bills for the pickup of each type of **[material or hazardous substance]**; and
27. identity of the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of **[material or hazardous substance]**.
28. Identify the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.
	1. Describe the basis for and provide any documents supporting the answer to this question.
29. If not already provided, specify the dates and circumstances when Respondent's **[material or hazardous substance]** was taken to the Site, and identify the companies or individuals who brought Respondent's **[material or hazardous substance]** to the Site.
	1. Provide all documents which support or memorialize Respondent’s response.
30. If Respondent transported any of its wastes away from its operations, indicate and answer all preceding subpart questions within question 48 related to “Waste Carriers” with reference to Respondent's actions.

# CONDITION OF THE HAZARDOUS SUBSTANCES

1. Identify, describe, and provide all documents that refer or relate to:
2. The nature, including the chemical content, characteristics, physical state (e.g., solid, liquid) and quantity (volume and weight) of all hazardous substances involved in each arrangement transferring materials from any facility owned or operated by Respondent to any other facility.
3. In general terms, the nature and quantity of the non-hazardous substances involved in each such arrangement.
4. The hazardous substances being mixed or combined with other hazardous substances or non-hazardous substances. Is this mixing or combining common in the industry? Was Respondent ever asked to stop mixing or combining the hazardous substances with the non-hazardous substances? Did the hazardous substances need to be used in conjunction with the non-hazardous substances? Did the hazardous substances ever lose their usefulness?
5. Other materials besides the hazardous substances that were involved in the transaction. How did the hazardous substances factor into the sales price?
6. The condition of the transferred material containing hazardous substances when it was stored, disposed of, treated or transported for disposal or treatment.
7. The markings on and type, condition and number of containers in which the hazardous materials were contained when they were stored, disposed, treated, or transported for disposal or treatment.
8. All tests, analyses, analytical results and manifests concerning each hazardous substance involved in each transaction. Include information regarding who conducted the test and how the test was conducted (batch sampling, representative sampling, splits, composite, etc.)
9. Did the buyer ever communicate to or otherwise inform Respondent that the buyer had no use for the hazardous substances?
10. Provide any correspondence or other communications between Respondent and the buyer regarding what the buyer planned to do with the hazardous substance.
11. Describe any leaking of any materials at the time of Respondent’s delivery of these materials to any buyer’s property.

# OPERATIONS AT THE SITE

1. Identify and describe, and provide all documents that refer or relate to the following:
2. How were hazardous substances or materials containing hazardous substances used or planned to be used at the Site?
3. What was done to any hazardous substances once they were brought to the Site, including any service, repair, recycling, treatment, or disposal?
4. What activities were typically conducted at the Site or the specific facility where any hazardous substances were sent by Respondent? What were the common business practices at the Site? How and when did Respondent obtain this information?
5. How were hazardous substances typically used, handled, or disposed of at the Site?
6. Did Respondent ever travel to the Site? If so, how many times and when did Respondent travel to the Site? When travelling to the Site, explain the details of the visit, including how long Respondent stayed, who Respondent met with, and the nature of the visit.
7. Did Respondent know that hazardous substances were disposed of at the Site? If not, why not?
8. Did Respondent have any influence over waste disposal activities at the Site? If so, how?
9. Did Respondent know if the owner(s) and/or operator(s) of the Site were removing a hazardous substance from the transferred material?
10. Did Respondent know, based on general industry knowledge, if the hazardous substances would need to be removed from the transferred material in order for that material to be useful?
11. What percentage of Respondent’s total hazardous substances went to the Site?
12. What steps did Respondent take to dispose of or treat any hazardous substances among the materials transferred to the Site? Provide any agreements and documents, including waste logs, journals, or notes, reflecting these steps.
13. What involvement (if any) did Respondent have in selecting the particular means and method of disposal of the hazardous substances at the Site?
14. At the time Respondent transferred the materials containing hazardous substances to the Site, what did Respondent intend to happen to the hazardous substances? Provide any agreements and documents, including waste logs, journals, or notes, reflecting the intention of the parties. If Respondent does not have such documents and/or materials, please so state.
15. With respect to all arrangements involving materials containing hazardous substances, at the time of the arrangement, specify the measures Respondent took to determine the actual means of treatment, disposal or other uses of hazardous substances at the Site. Provide information Respondent had about the treatment and disposal practices at the Site. What assurances, if any, were Respondent given by the owners/operators at the Site regarding the proper handling and ultimate disposition of the materials Respondent sent there?
16. What efforts, if any, did Respondent take to investigate the nature of the operations conducted at the Site and the environmental compliance of the Site prior to selling, transferring, delivering (e.g., for repair, consignment, or joint-venture), disposing of, or arranging for the treatment or disposal of any hazardous substances.
17. How long did Respondent have a relationship with the owner(s) and/or operator(s) of the Site?
18. Provide names, addresses, telephone numbers, and email addresses of any individuals, including former and current employees, who may be knowledgeable of Respondent's operations and practices concerning the handling, storage and disposal of hazardous substances at the Site.
19. Identify the date(s) on which the hazardous substances were sent, brought or moved to the Site, and the names, addresses and telephone numbers of the person(s) making arrangements for the containers (e.g., 55 gallon drum, dumpster, etc.) holding the hazardous substances to be sent, brought or moved to the Site.

# PERMITS/REGISTRATIONS

1. List all federal, state, and local permits and/or registrations including respective permits issued to Respondent for the transport, generation, and/or disposal of **[materials or hazardous substances]**.
2. Which shipments or arrangements were sent under each permit? If what happened to the **[materials or hazardous substances]** differed from what was specified in the permit, state, to the best of Respondent’s knowledge, the basis or reasons for such difference.
3. Were all **[materials or hazardous substances]** transported by licensed carriers to hazardous waste treatment, storage, and disposal facilities permitted by the EPA?
4. Does Respondent have a permit or permits issued under RCRA?
	1. Does Respondent have, or has Respondent ever had, a permit or permits under the hazardous substance laws of the state of **[insert state]**?
	2. Does Respondent have an EPA Identification Number, or an identification number supplied by **[insert the corresponding state agency or official of the state]**? If so, supply any such identification number(s).
5. Was a Notification of Hazardous Waste Activity ever filed with the EPA or the **[insert the corresponding state agency or official of the state]**,
	1. List the date of such filing.
	2. List the wastes described in such notice.
	3. List the quantity of wastes described in such notice.
	4. List the identification number assigned to such facility by EPA or the **[insert the corresponding state agency or official of the state]**.

# RESPONDENT'S ENVIRONMENTAL REPORTING

1. List all federal and state offices to which Respondent has sent or filed hazardous substance or hazardous waste information.
2. Indicate the years during which such information was sent/filed.
3. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: TSCA, EPCRA, CWA, and **[insert state laws and regulations].**
	1. Describe the circumstances of such reporting.
4. Provide any release reports that were made pursuant to Section 103(a) of CERCLA and Section 304 of EPCRA.
5. List the federal and state offices to which such information was sent.
6. Has Respondent made any claims on comprehensive liability insurance related to a spill or accident involving any hazardous substance at Respondent’s Facility?
7. Have any worker’s compensation claims been made due to exposure of any **[materials or hazardous substances]** at Respondent’s Facility?