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April 24, 2008

Re: EPA Audit & 10 Action Items

Ladies and Gentlemen:

In an effort to save time during the audits, we have been in the practice of disclosing “potential violations” as well as violations confirmed during the audit. In the case of potential violations we used the corrective action period to confirm or eliminate those violations.

EPA has recently asked that we not disclose “potential” violations and has insisted that we determine at the audit whether or not a true violation exists.

Enclosed is a list of 10 Action Items that HRP Associates, Inc. has shared with you as a list of “good ideas” to be considered before your audit. I now ask you to reconsider that list and proceed aggressively to accomplish those tasks prior to your audit. In this way, we can reduce the amount of time which otherwise might be necessary for the auditors to spend on your campus and we can give EPA the information they need in a timely manner.

I can assure you that this arises purely from EPA’s need to assign review of our filings and does not arise from any discontent with the program. Rather, it is a set of tasks which will benefit all involved.

Thank you for your cooperation and I look forward to working with you toward a successful completion of this project.

Very truly yours,



David B. Losee

DBL/sm
Enclosure