

ISAACSON & RAYMOND  
ATTORNEYS AND COUNSELORS AT LAW

May 1, 2015

Maine Department of Environmental Protection  
Division of Remediation  
ATTN: David Wright, Division Director  
17 State House Station  
Augusta, Maine 04333

**Re: Sultan Corporation**

Dear David:

Enclosed please find Sultan Corp's Answer to the second Request for Information.

If you have any questions, please let me know.

Sincerely,



Ted Small

Maine Department of Environmental Protection  
Division of Remediation  
17 State House Station  
Augusta, Maine 04333

Attn: David Wright, Division Director

Dear Mr. Wright,

Sultan Corp. hereby Answers the Second Request for Information served by your division by letter dated March 19, 2015:

Question 1: Sultan Corp.

Question 2: Debra Sullivan, President.

Question 3: Debra Sullivan, Joe Dunne.

Question 4: None.

Question 5: Richard LeCompte may have additional information regarding the history of the property and potential insurance coverage. The only contact information we have is his phone number: (207) 754-3425.

Question 6: See response to Question 5 above.

Question 7: Sultan, did not know, and had no reason to know any hazardous substance was disposed of on, in, or at the facility or site. When Sultan acquired the site, the site was, as it is now, a residential facility. Sultan only learned after the inception of Department of Environmental Protection action taken after Sultan acquired the site that a party who previously owned the site had operated the site as a dry cleaner and, allegedly, had caused the discharge of hazardous substances. When it purchased the site as a residential building, Sultan had no reason to believe the substances that are the subject of this dispute had been discharged under a prior owner. Prior to purchasing the site, Sultan conducted due diligence consistent with its own practice, and consistent with commercial and customary practice to assess any risks associated with purchasing the site.

Question 8: Since Sultan has owned the site, there have been no acts or omissions of any third parties who could have contributed to the discharge or threat of discharge of hazardous substances at the site or damages relating therefrom. As a result of this present dispute, Sultan learned discharge and/or damages occurred under a prior owner, who used the property for a dry cleaning business. Sultan acquired the property after it had been converted to residential units, and there has been no risk of any discharge of any hazardous substances since Sultan acquired the property.

Question 9: We are not aware of any insurance policies covering Sultan Corporation that may cover any costs, expenses, or damages relating from or relating to the discharge or threatened discharge of hazardous substances at the site.

Question 10: Roux Insurance Services, 185 Webster St, Lewiston, ME 04240

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 with the person or persons who were directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. A diligent record search has been completed and there has been a diligent interviewing process with present and former employees who may have knowledge or operations, business, relationships, contractual agreements, financial arrangements, chemical use, hazardous substance or waste transport, disposal, storage, treatment and/or other handling methods and locations of, such handling methods and any other knowledge of the Site and/or operations relating to this request. All information and documents responsive to the Department of Environmental Protection's Request for Information have been forwarded to the DEP. All questions and requests have been responded to fully. I am aware that there are significant penalties, including the possibility of fine and imprisonment, for non-compliance with this request or for knowingly submitting false information or tampering with the information submitted.

Sincerely,



Handwritten signature in blue ink, appearing to read "Debra Sullivan, President, Sultan Corp."

Debra Sullivan, President of Sultan Corporation

Before me, personally appeared the above-named Debra Sullivan, in her capacity as President of Sultan Corporation, and made oath and swore that the foregoing statements were true based on her personal knowledge, and upon information and belief.



Handwritten signature in blue ink, appearing to read "Pamela J. Emons". Below the signature is a horizontal line and the text "Notary Public".

PAMELA J. EMMONS  
Notary Public, Maine  
My Commission Expires December 19, 2016

## Wright, David W

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**From:** Ted Small <Ted@isaacsonraymond.com>  
**Sent:** Thursday, April 16, 2015 11:15 AM  
**To:** Wright, David W  
**Subject:** RE: sultan corp - Beal's Linen Site

Thanks, David.

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**From:** Wright, David W [mailto:David.W.Wright@maine.gov]  
**Sent:** Thursday, April 16, 2015 10:34 AM  
**To:** Ted Small  
**Cc:** Blais, Becky; LaFond, Peter  
**Subject:** RE: sultan corp - Beal's Linen Site

Ted, this is to confirm that you may have an extension until May 1, 2015 to respond to the second request for information that DEP sent to Sultan Corp with respect to the Beal's Linen matter. Also, it is ok to defer the discussion until after April 24<sup>th</sup> regarding Sultan Corp taking over operations of the SSDS at that site.

David Wright, Director  
Division of Remediation, BRWM  
Maine Department of Environmental Protection  
17 SHS, Augusta, Maine 04333-0017  
207-446-4366  
[David.W.Wright@maine.gov](mailto:David.W.Wright@maine.gov)

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**From:** Ted Small [mailto:Ted@isaacsonraymond.com]  
**Sent:** Thursday, April 16, 2015 9:58 AM  
**To:** Wright, David W  
**Subject:** sultan corp

David,

I'm writing to confirm our discussion this morning. You have agreed that Sultan Corp. may have to and until May 1, 2015 to respond to the DEP letter dated March 19, 2015.

Also, although we did not discuss this, I also have a letter dated March 5, 2015 discussing the possibility of Sultan assuming the responsibility of operating and maintaining the SSDS. I'm not sure of Sultan's position on that issue yet. I may need to discuss the details with you on that issue. Let me know if it's ok to defer any discussion until I return from vacation – I will be away from April 17-April 24.

**Ted Small**  
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