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September 12, 2006

VIA OVERNIGHT MAIL

Tanya Mitchell
Remedial Project Manager
United States Environmental Protection Agency – Region II
Emergency and Remedial Response Division
290 Broadway, 19th Floor
New York, New York 10007-1866

Re: Notice of Potential Liability, Request to Perform the RI/FS,
and Demand for Reimbursement of Costs for the
Crown Vantage Superfund Site,
Milford, Hunterdon County, New Jersey

Dear Ms. Mitchell:

We represent Rexam Inc. (“Rexam”) f/k/a Rexham Corporation (“Rexham”) with respect to the above-referenced matter. In September 2005, Rexam received the United States Environmental Protection Agency’s (“EPA”) 104 (e) Request for Information pertaining to the Crown Vantage Landfill Site (the “Site”). Based upon the information contained in the EPA’s 104 (e) Request, Rexam understands that the Crown Vantage Landfill Site is located in Milford, New Jersey, and was operated by a company known as Riegel Paper Corporation (“Riegel”). According to the EPA, the Site is allegedly contaminated with materials disposed of from certain former Riegel facilities. The EPA apparently believes that Rexam (as successor to Rexham) may be a potentially responsible party (“PRP”) and liable as a person who arranged for the disposal of hazardous substances at the Site.

On October 27, 2005, in connection with the preparation of Rexam’s 104(e) Responses, Rexam submitted a Freedom of Information Act (“FOIA”) request to the EPA for records pertaining to the Crown Vantage Landfill Site. (A copy of the EPA’s November 4, 2005 letter acknowledging receipt of Rexam’s FOIA request is attached hereto as Exhibit A). Rexam never received any documentation in response to its October 27, 2005 FOIA request.

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On December 16, 2005, Rexam submitted its 104 (e) Responses relating to the Site. Rexam's 104 (e) Responses provided a detailed explanation, along with supporting documentation and corporate agreements, setting forth the former business relationship between Rexham and Riegel. A summary of the relationship between Rexham and Riegel is again provided below.

Relationship Between Rexham Corporation and Riegel Paper Corporation

In 1963, Riegel Paper Corporation ("Riegel") moved its Flexible Packaging Division from the Milford, New Jersey plant ("Milford Plant") to a newly built facility located at 112 Church Street Extension, Flemington, New Jersey (the "Flemington facility"). Riegel's paper manufacturing operations remained at the Milford Plant. The Flemington facility was known as the Riegel Packaging facility.

On September 16, 1971, Rexham Corporation ("Rexham") was incorporated under the laws of the State of Delaware. On September 23, 1971, Riegel, Federal Paper Board Company, Inc. ("Federal") and Rexham entered into an Agreement And Plan Of Reorganization (the "Agreement"). (The Agreement, referenced Schedule 4.1.A and Schedule 4.1.B, and Exhibits were submitted as Attachments 1, 2, 3, and 4 respectively to Rexam's 104(e) Responses).

Prior to the merger and reorganization, the business and operations of Riegel were generally comprised of four divisions: The Paper Division, the Forest Products and Real Estate Division, the Packaging Division and the Industrial Division. To facilitate the merger and reorganization contemplated under the Agreement, Riegel combined the Paper Division and the Forest Products and Real Estate Division to form "the Paper Group" (as defined in the Agreement), and combined the Packaging Division and the Industrial Division to form "the Packaging Group" (as defined in the Agreement). As part of the merger and reorganization, and subject to the Agreement, Riegel spun-off and transferred to Rexham certain of the assets and certain of the liabilities of the Packaging Group. The Packaging Group business assets acquired by Rexham included Riegel's Flexible Packaging Division located at the Flemington facility.

The Agreement provides that Rexham assumed certain limited liabilities attributable to the Packaging Group, which included liabilities arising from the operation of the Flemington facility as defined in the Agreement and Schedule 4.1.A. Under the Agreement, Rexham did not assume any liability for the Flexible Packaging Division when it operated out of the Milford Plant. Rather, the Agreement provides that Rexham assumed only those liabilities arising from Riegel's Packaging Group business operations while at the Flemington facility. The Flemington facility was the only Packaging Group facility located in New Jersey at the time of

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the spin-off and reorganization and, therefore, the only Riegel facility in New Jersey that transferred to Rexham.

As provided in the Agreement, Rexham did not assume any liability for Riegel's former Milford Plant or for the Flexible Packaging Division when it was operated by Riegel out of the Milford Plant. The information and documentation that Rexham located and produced firmly establishes that as a result of Rexham's spin-off from Riegel, Rexham assumed only those liabilities arising from the business operations of Riegel's Packaging Group while at the Flemington facility. In addition, based on the information/documentation that Rexham located and produced to date, none of the waste generated by the Flemington facility, either during Riegel's or Rexham's operational period, was hauled to the Site.

As it was unclear to Rexham why the EPA continued to view Rexham as a PRP with respect to the Crown Vantage Landfill Site, on September 5, 2006 we contacted Alex Ince, Assistant Regional Counsel at the EPA. During the September 5, 2006 telephone conversation, Ms. Ince informed us, for the first time, that the EPA has documentation that purportedly links some of the Flemington facility waste to the Crown Vantage Landfill Site. Rexham was unaware that such documentation existed and, quite frankly, was surprised as it contradicts the information independently obtained by Rexham.

Ms. Ince suggested that Rexham submit another FOIA request to EPA, requesting the previously referenced documents pertaining to the Flemington facility. On September 5, 2006, we again (on behalf of Rexham) submitted another FOIA request to EPA requesting, among other things, the documents pertaining to the Flemington facility. (A copy of the EPA's September 12, 2006 letter acknowledging receipt of Rexham's September 5, 2006 FOIA request is attached hereto as Exhibit B). We advised Ms. Ince that until we received and reviewed the documents from the EPA that purportedly link the Flemington facility waste to the Site, Rexham would be unable to respond to the EPA's request that Rexham participate in conducting the RI/FS at the Site and/or contribute to the EPA's past response costs. Ms. Ince advised us that she would try to provide Rexham with the Flemington facility documents as quickly as possible.

To date, Rexham has not received the documents that purportedly link some Flemington facility waste to the Site. As such, Rexham is presently not in a position to consider whether to enter into a settlement with EPA and/or otherwise conduct the RI/FS at the Site. Further, as Rexham has obtained no evidence to support a finding that it is in any way responsible for, or liable for, the alleged contamination at the Site, Rexham is not in a position to consider whether to contribute toward the EPA's past response costs at this time. If additional information or documentation becomes available that alters or amends Rexham's current understanding of this matter, Rexham shall review the information/documentation and reconsider its position at that time.

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Rexam reserves all its rights and defenses with respect to this matter and requests EPA provide all documentation previously requested by Rexam with respect to the Crown Vantage Landfill Site.

Please contact us if you have any questions concerning this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read 'W. S. Hatfield', written over the typed name.

WILLIAM S. HATFIELD

cc: Alexandra Ince, Esq.
Assistant Regional Counsel



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 2, 290 Broadway, 26th Floor
New York, NY 10007
212-637-3668
212-637-5046 (fax)
Calderon.Wanda@epa.gov

November 04, 2005

Ms. Camille V. Otero
Pitney Hardin
200 Campus Drive
Florham Park, NJ, 07932
United States

RE: Request No: 02-RIN-00159-06

Dear Ms. Otero,

This is to acknowledge receipt of your Freedom of Information Act (FOIA), 5 U.S.C. 552, request dated October 27, 2005 and received in this office on October 27, 2005, for records related to:

Crown Vantage Landfill

The program(s) office(s) that have been assigned this request will be responding to you directly. The Agency has twenty (20) working days to respond to your request, except when you have agreed to an alternate due date or unusual circumstances exist that would require an extension of time under 5 U.S.C. 552 (a) (6) (B).

Include your FOIA request number in all subsequent communications with respect to this assignment. Additionally, for faster processing you may provide your email address.
Thank you.

Respectfully,

Wanda Calderon
FOIA Specialist

Exhibit B



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 2, 290 Broadway, 26th Floor
New York, NY 10007
212-637-3668
212-637-5046 (fax)
Calderon.Wanda@epa.gov

September 12, 2006

Ms. CAMILLE V. OTERO
PITNEY HARDIN
P.O. BOX 1945
MORRISTOWN, NJ, 07962
United States

RE: Request No: 02-RIN-01994-06

Dear Ms. OTERO,

This is to acknowledge receipt of your Freedom of Information Act (FOIA), 5 U.S.C. 552, request dated September 05, 2006 and received in this office on September 06, 2006, for records related to:

Crown Vantage Superfund Site

The program(s) office(s) that have been assigned this request will be responding to you directly. The Agency has twenty (20) working days to respond to your request, except when you have agreed to an alternate due date or unusual circumstances exist that would require an extension of time under 5 U.S.C. 552 (a) (6) (B).

Include your FOIA request number in all subsequent communications with respect to this assignment. Additionally, for faster processing you may provide your email address.

Thank you.

Respectfully,

Wanda Calderon
| FOIA Specialist