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February 4, 2002

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File No: 97-10880MFL

*Certified by the Supreme Court
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FOIPA REQUEST
Case No. 2002-0125
Date Rec'd: 2-11-2002
Action Off: Brown
Related Case:

✓ Nuclear Regulatory Commission
Two White Flint North
11545 Rockville Pike
Rockville, MD 21758
att: FOIA Officer

U.S. Nuclear Regulatory Commission
Office of Public Affairs
Publications Services Division
Washington D.C. 20555
att: FOIA Officer

Defense Department
OATSD (PA)
Rm 1400 Defense, Pentagon
Washington, DC 20301-1400
att: FOIA Officer

Defense Nuclear Agency
Public Affairs Office
6801 Telegraph Road
Alexandria, VA 22310-3398
att: FOIA Officer

Environmental Protection Agency
US EPA
West Tower, Rm 385
401 M. Street, S.W.
Washington, DC 20460
att: FOIA Officer

Page No. _____

To: Recd _____

Action Off: _____

Related Cases: _____

File 10880

2/4/02

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**RE : DuPont Pompton Lakes Works;
Pompton Lakes, Passaic, County, NJ
Uranium; Depleted Uranium; Munitions**

EXPEDITED Freedom of Information Act Request

Dear Sir or Madam:

The undersigned represents over 1,600 present or former residents of Pompton Lakes, NJ, in an environmental tort lawsuit against E.I. DuPont de Nemours & Co., which, from approximately 1902, manufactured munitions and explosives at its Pompton Lakes Works, Pompton Lakes, Passaic County, New Jersey (hereinafter "PLW").

Under the Freedom of Information Act, I request copies of all records in the possession of your department and/or office dealing with:

1. The transfer, transportation, delivery, storage, movement, etc. of uranium and/or depleted uranium to, from or on PLW;
2. The assembly, manufacture, storage, distribution at PLW of munitions, shells, shell caps or other products containing uranium and/or depleted uranium;
3. Disposal at or from PLW of products containing uranium and/or depleted uranium;

On behalf of my clients, I am making this request to inquire whether uranium and/or depleted uranium was involved at the PLW site. If this inquiry is confirmed, there may be public health concerns based upon the manufacture and disposal methods at the PLW site.

I request that this FOIA request be expedited, as the environmental tort action captioned Naftali v. E.I. DuPont de Nemours & Co., Superior Court of New Jersey, Law Division, Passaic County, has a trial date of April 1, 2002.

Your attention to this matter is greatly appreciated.

Very truly yours,



Michael F. Lombardi

MFL/cmm