

Iowa Department of Natural Resources
6200 Park Avenue, Suite 200
Des Moines, Iowa 50321

Re: **Confidentiality Request Under IAC 561-2.5(7)(c)**

Submitted Item: **General Letter Containing Time-Extension Request, CRT Panel Glass TCLP Summary, and Operational Plans for Hoop Building and Panel Processing**

To Whom It May Concern:

Pursuant to **IAC 561-2.5(7)(c)**, GKAT Reclamation LLC hereby submits the enclosed general letter, which includes:

- a request for additional time relating to management of CRT panel glass,
- a summary of recent TCLP analytical results for CRT panel glass, and
- an overview of GKAT's planned operational steps, including installation of the hoop building and updates to panel-glass processing practices.

GKAT respectfully requests that the enclosed material be treated as **confidential**. In support of this claim, the following substantiation is provided.

1. Measures taken to protect confidentiality and commitment to maintain those measures.

GKAT Reclamation LLC treats internal operational communications, processing plans, regulatory planning documents, and environmental testing information as confidential. Access is limited to authorized personnel, and materials are housed in secured systems. We will continue applying these protections to the enclosed materials.

2. Practices of other businesses regarding similar information.

In the electronics recycling and materials-management sectors, businesses routinely treat internal operational plans, regulatory strategies, environmental testing summaries, and facility-expansion or modification plans, such as building additions, processing modifications, or corrective-action timelines, as confidential. Such information is generally shared only with regulators and is not made available to the public.

3. Information not reasonably obtainable by others without authorization.

The enclosed letter reflects GKAT's internal operational planning, including timing for the hoop building installation, panel-glass processing plans, and environmental testing summaries that are not public, not published, and cannot be obtained through legitimate means without GKAT's consent.

4. Likelihood of substantial harm if disclosed.

Even though the enclosed materials do not include pricing or sensitive business strategies,

public release would disclose GKAT's internal compliance approach, operational sequencing, panel-processing adjustments, and facility-planning considerations related to CRT panel glass. Releasing these internal details may lead to misunderstandings, create unnecessary exposure, or place GKAT at a disadvantage relative to entities not required to make such internal operational strategies public.

5. Prior confidential treatment of similar categories.

Regulatory agencies, including the Iowa DNR, have historically treated internal environmental testing results, corrective-action planning information, facility-modification plans (including temporary structures such as hoop buildings), and operational updates as confidential when supported by a proper claim. Similar categories of information have previously been withheld under Iowa Code section 22.7 and IAC 561-2.5.

Based on the above, **GKAT Reclamation LLC respectfully requests confidential treatment of the enclosed materials** in accordance with IAC 561-2.5(7)(c) and Iowa Code section 22.7.

Please contact us if additional information or further substantiation is needed.

Thank you for your consideration.

Sincerely,

Brian Paterson

Partner

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