

LEAR SIEGLER DIVERSIFIED HOLDINGS CORP.
P. O. Box 457
Bonita Springs, FL 34133

October 16, 2014

Ms. Pauline Batarseh
Chief, Policy Implementation Branch
Policy and Program Support Division
Hazardous Waste Management Program
Department of Toxic Substances Control
1001 I Street
Sacramento, CA 95812-0806

Re: Summary of Violations – Lear Siegler

Dear Ms. Batarseh:

Please consider this letter to be a response to your letter dated July 3, 2014 addressed to CT Corporation with reference to Lear Siegler.

Before responding to the substance of your letter, I would like to provide some background on Lear Siegler. From the 1950's through the mid-1980's Lear Siegler, Inc. was a large industrial company with operations in many fields, including the manufacturing and distribution of heating and air conditioning equipment. However, in 1986 Lear Siegler, Inc. exited the heating and air conditioning business and sold all of its heating and air conditioning operations to an unrelated third party. Included with the assets transferred to the buyer were all of the books and records relating to the business. In the late 1980's Lear Siegler, Inc. began a process of corporate reorganization pursuant to which it disposed of all of its remaining business units. This process was completed in 1996, when the last operating business unit was sold. As part of this reorganization, Lear Siegler Diversified Holdings Corp. became responsible for winding up the remaining affairs of Lear Siegler, Inc., including the administration of several benefit plans for retirees (many of whom live in California), resolution of some remaining liabilities of Lear Siegler, Inc. and realization of some remaining assets of Lear Siegler, Inc. As this process has progressed, most of the employees have left, and since 1997, I have been the sole employee of the Company.

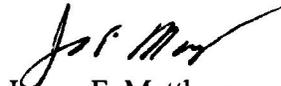
Several years ago, I became aware of the various state laws that mandated collection of discarded mercury thermostats. Given the lack of available manpower to effect compliance, and the Company's limited financial resources, it became apparent that it would be virtually impossible for Lear Siegler to respond to these statutes unilaterally. In order to be in a position to comply with these statutes, the Company became a member of Thermostat Recycling Corporation ("TRC"). For the ensuing period, the Company has complied with the mandates of these laws through the efforts of TRC.

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In evaluating Lear Siegler's compliance with the regulations promulgated by the Department, I ask that the Department take into consideration the mitigating circumstances discussed above. Simply put, Lear Siegler does not have the resources to comply with the regulations on its own. Its only avenue of compliance is through TRC. In consideration of such recognition, Lear Siegler undertakes to more aggressively work with TRC and its members to more fully respond to the issues raised by the Department in the Department's assessment of TRC's 2013 Program and to address the concerns raised by the Department with respect to TRC's Program Enhancements Proposed for 2014. In particular, we will work with TRC and its members to address additional methods that may enhance collections. Also in this regard, we would support the commissioning of a new study to provide a basis for new performance goals which both the Department and TRC's members agree are appropriate and attainable.

In closing, I would like to reiterate that it is the intent of Lear Siegler to fully comply with the regulations promulgated by the Department in a manner which is within the Company's means and which addresses the concerns of the Department. I look forward to a constructive dialog as we move forward.

Very truly yours,



James F. Matthews
President

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