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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-3211

Via Airborne Express

March 28, 1990

David B. Graham, Esq.
Kaye, Scholer, Fierman, Hays & Handler
901 Fifteenth Street, N.W., suite 1100
Washington, D.C. 20005

Re: Picillo Farm Superfund Site--RI/FS Work Plan

Dear Mr. Graham:

In response to your request, I enclose a copy of the two-volume "Final Work Plan--Remedial Investigation and Feasibility Study--Picillo Farm Site, Town of Coventry, Rhode Island" dated January 1990 that was prepared for EPA by Ebasco Services Incorporated.

As I explained over the phone, EPA is preparing to start a Remedial Investigation/Feasibility Study ("RI/FS") for the Picillo Farm Superfund Site in Coventry, R.I. (the "Site"). I contacted you to notify your clients Ashland Company, GAF Corporation, General Electric Company, and Monsanto Company (the "Settling Parties") of this RI/FS and to offer the Settling Parties the opportunity to conduct or participate in the development of the RI/FS.

As I also explained over the phone, EPA has A.D. Little under contract for RI/FS work. The RI/FS Work Plan breaks the RI/FS down into phases. The first phase, Phase IA, would characterize existing site conditions, take 5-6 months, and cost perhaps \$150,000. A.D. Little is expected to be ready to start the preparation for this Phase IA on May 1. Phase IB would consist of dropping new wells, taking samples, and writing up reports; this is expected to take 5 months, would be completed by the end of spring 1991, and may cost \$200,000. The scope of Phase II would be determined by Phase IB results, may cost between \$350,000 and \$600,000, and should be completed by December of 1991. These are rough estimates and subject to change.

These Settling Parties entered into a consent decree with the United States regarding the Site that was entered April 14, 1988 in U.S. v. Ashland Chemical Company, et al. (D.R.I. Civ. No. 87-0475) and O'Neil v. Picillo, et al. (D.R.I. Civ. No. 83-0787).

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PICILLO FARM
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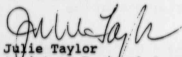
Notice regarding this RI/FS has also been provided to attorneys for American Cyanamid Company and Rohm & Haas Company (defendants in the cost recovery lawsuit filed by the United States in October of 1989), attorneys for 18 defendants in a contribution action filed by American Cyanamid and Rohm & Haas, attorneys for the Capuanos and their corporations (settlers under a consent decree with the U.S. regarding the Site), and attorneys for Hydron Laboratories, Inc. (a settler under a consent decree with the U.S. regarding the Site).

You and I discussed that the Settling Parties were not released under their consent decree from liability for groundwater claims at the Site. The Settling Parties may therefore conclude that participating in the RI/FS is in their best interests in the long run, as the groundwater remedial work will be determined by the RI/FS.

As I conveyed to you, EPA would like some more formal indication of your clients' intentions regarding their involvement with the RI/FS work as soon as possible.

If you have any questions regarding this letter, please call me at (617) 565-3430. Thank you for your cooperation.

Sincerely,



Julie Taylor
Assistant Regional Counsel

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