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November 29, 2012

Eve S. Vaudo, Esq.
Senior Enforcement Counsel
EPA-New England, Region I
5 Post Office Square Suite 100
Mail Code OES04-4
Boston, MA 02109-3912

RE: November 14, 2012 Invitation to Perform Limited Cleanup Activities for the Centredale Manor Restoration Project Superfund Site

Dear Ms. Vaudo:

This letter is in response to your November 14, 2012 letter inviting the 13 members of the NECC Customer Group ("Group"), among others, to perform specific remedial activities at the Centredale Manor Site ("the Site").

As you know, on July 16, 2012, representatives of these companies met with U.S. EPA and the U.S. Department of Justice ("DOJ") and made a de minimis settlement offer to resolve the Group's alleged liability at the site. This meeting followed an initial de minimis offer made by the Group in July 2006. We understood from our summer meeting that EPA and DOJ were open to the possibility of a monetary settlement but wanted this matter resolved in the context of Court ordered mediation in the ongoing litigation. As a result, we are diligently working toward that end.

The Group's members, most of which are third-party defendants in the ongoing Emhart, et al. v. United States, et al., No. 11-cv-023S (D.R.I.) litigation, are currently participating in the selection process of a prospective mediator as required by the current Case Management Order. Our goal remains to reach a de minimis settlement with the United States as soon as possible. Our Group consensus and strong preference is to resolve the Group's alleged liability in that manner and not by means of the work described in your letter, the cost of which would significantly exceed the Group's alleged responsibility with respect to the Site.

Sincerely,



David B. Graham
(On behalf the NECC Customer Group members
listed on Attachment A)

Enclosure

ATTACHMENT A
(NECC Customer Group Members)

BASF Corporation(Ciba Specialty Chemicals Corporation)

CNA Holdings LLC (American Hoechst)

Union Oil Company of California (American Mineral Spirits Company)

Sequa Corporation (Warwick)

Duro Textiles

The Original Bradford Soap Co.

Exxon Mobil Corporation

Teknor Apex Company

Cranston Print Works Company

Organic Dystuffs Corporation

BNS Co.

Phibro Animal Health Corporation

Lonza Inc.