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September 18, 1985  
2843-84

By Hand

U.S. Environmental Protection Agency  
Heather M. Ford, Chief  
Enforcement and Cost Recovery Section  
Waste Management Division  
J.F. Kennedy Federal Bldg. - Room 1907  
Boston, MA 02203

Re: Information Request to Donald A. Millard, Jr.,  
Municipal Wells Superfund Site, Groveland, MA

Dear Ms. Ford:

The following is the response of Donald A. Millard, Jr. to the information request contained in a recent undated letter from Merrill S. Hohman, Director, Waste Management Division. Mr. Millard is responding to the specific requests set forth in said Information Request and the instructions prefacing those requests insofar as they are within the statutory authority of the Environmental Protection Agency ("EPA"), namely RCRA §3007 and CERCLA §104. Mr. Millard objects to all other instructions or questions which are irrelevant to the EPA statutory authority to seek information relating to hazardous substances or hazardous wastes and/or records relating to such substances. In particular, Mr. Millard objects to the verification instructions set forth in paragraph (i) as the EPA does not have the statutory authority to require compliance with the same.

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U.S. Environmental Protection Agency  
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Response to Requests No. 4-7: Mr. Millard has no  
information responsive to these requests in addition to that  
provided in the responses of Groveland Resources Corporation  
and Valley Manufactured Products Company, Inc.

Donald A. Millard, Jr.  
By his attorneys,

*Mary K Ryan*

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