

NOTICE: If the film image is less clear than this notice, it is due to the quality of the document being filmed

GROVELAND WELLS
ADMINISTRATIVE RECORD

GRO 006

2006

F

11.9.33

NUTTER, McLENNEN & FISH

A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

FEDERAL BAR BUILDING WEST
1818 H STREET, N.W.
WASHINGTON, D.C. 20006
TELEPHONE (202) 896-3500
EUROPEAN COUNSEL
PARIS

FEDERAL RESERVE PLAZA
600 ATLANTIC AVENUE
BOSTON, MASSACHUSETTS 02110

(617) 973-9700

TELEX 940790
TELECOPIER (617) 973-9748

333 MARKET STREET
27TH FLOOR
SAN FRANCISCO, CALIFORNIA 94105
TELEPHONE (415) 341-9399
JAPANESE COUNSEL
TOKYO

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.

NOTICE: If the film image
is less clear than this
notice, it is due to the
quality of the document
being filmed

GROVELAND WELLS
ADMINISTRATIVE RECORD

GRO 006

2007

L

NUTTER, McCLENNEN & FISH
U.S. Environmental Protection Agency
Heather M. Ford, Chief
September 18, 1985
Page 2

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

Mary K. Ryan
Nutter, McClennen & Fish
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210
(617) 973-9700