



May 7, 2013

via electronic transfer

Nick Tymchenko
Remedial Branch Hazardous Site Cleanup Division
US EPA Region 3 (3HS22)
1650 Arch Street
Philadelphia, PA 19103-2029

RE: Sauer Dump Superfund Site
Administrative Settlement Agreement and Order on Consent for RI/FS
United States of America v. American Premier Underwriters, Inc. et. al.,
Docket No. CERC-03-2012-0177DC

In accordance with Paragraph 8.1 of the Remedial Investigation/Feasibility Study (“RI/FS”) Administrative Settlement Agreement and Order on Consent for the Sauer Dump Superfund Site (“the Site”) entered March 18, 2013 in the above-captioned case (“the Order”), the Sauer Dump Settling Parties Group (“the Group”) submitted the name of the Group’s project coordinator to U.S. EPA on April 17, 2013. This letter is submitted on behalf of the Group. During our telephone conversation on April 18, 2013, I informed you of the Group’s efforts to identify and contract with a qualified and experienced consultant to perform the RI/FS and the need for an extension to the schedule specified by the Order. The purpose of this letter is to provide you with an update of the Group’s efforts to contract with a qualified consulting firm and to request a schedule extension.

During April 2013, the Group distributed a Request for Proposal to a number of qualified companies and conducted a Site visit with their representatives on April 12, 2013. Due to the extensive number of historical reports and data for this Site, and the time required for review and evaluation of the information, the Group will not receive scope of work and cost proposals until May 6, 2013. The Group will then require time to review and evaluate the proposals, select several of the best candidates, and conduct interviews necessary for final selection. After the selection process is complete, some period of time will be required for contract negotiation. The Group will strive to expedite this process but it is likely that the required notification to U.S. EPA under Paragraph 9.1(a) of the Order cannot be made until late-May 2013. Therefore, the Group requests that U.S. EPA grant an extension to the schedule for submittal of the Group’s consultant to May 28, 2013.



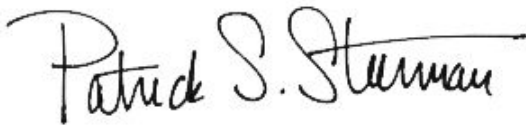
Steerman Environmental
Management & Consulting, LLC
422 Creek View Lane
Roswell, Georgia 30075
(404) 421-3275 - Voice
psteerman@charter.net

The extension for submittal of the consultant to U.S. EPA may be offset somewhat by the earlier submission of the RI/FS Work Plan (“the Work Plan”) specified in Paragraph 9.1(a) of the Order, which is to be submitted within 45 days of U.S. EPA’s approval of the Group’s consultant. While the Order allows 45 days for submittal of the Work Plan, the Group is committed to working with the consultant, and U.S. EPA, to develop ways to mitigate delays associated with implementation of field activities that will be required by the Work Plan. The Group will work with the consultant and expects that an approvable RI Work Plan may be submitted to U.S. EPA within 30 days. Since the scope of work for the RI is well defined in the Order, an option for achieving the 30 day submittal schedule may be for the consultant to prepare a detailed RI Work Plan for review and approval by U.S. EPA and submit the FS Work plan later, as a separate document. It is expected that this may allow the required fieldwork to begin in close time proximity to the original schedule envisioned by U.S. EPA.

Thank you for U.S. EPA’s consideration of this request. The Group is hopeful that U.S. EPA will interpret its efforts to secure a qualified and experienced consultant as a strong indication of its desire to undertake the work set forth in the Order.

If you have any questions, please feel free to contact the undersigned at (770) 992-2386 or respond by electronic message to psteerman@charter.net.

Sincerely,

A handwritten signature in black ink that reads "Patrick S. Steerman". The signature is written in a cursive style with a long horizontal line extending from the end of the name.

Patrick S. Steerman
on behalf of the Sauer Dump Settling Parties Group

pss

cc: Cynthia Nadolski
Sauer Dump Settling Parties Group
Paul Miller – Sauer Dump Project Coordinator