

US EPA ARCHIVE DOCUMENT

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March 17, 2000

Centredale Manor
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8491

Via Certified Mail

Mr. Ted Bzenas
On-Scene Coordinator
U.S. Environmental Protection Agency
Region 1- New England
Site Evaluation and Response Section II
1 Congress Street, Suite 1100
Mail Code HBR
Boston, Ma 02203

Re: Centredale Manor Superfund Site
PRP Letter to Crown Metro, Inc.

Dear Mr. Bzenas:

I am writing on behalf of Crown Metro, Inc. (the "Company") in response to the Environmental Protection Agency's February 28, 2000 "Notice of Potential Liability" regarding the Centredale Manor Superfund Site in North Providence, Rhode Island (the "Site"). The Company is making this submission in the context of settlement discussions, and without any admission of liability.

At the outset, I would like to point out that there is no credible evidence establishing that the Company is in any way responsible for environmental conditions at the Site. Other than having the same corporate name as a previous entity who was associated with the site, CMI here in South Carolina has nothing to do with any facilities in Rhode Island. The Company never owned or conducted operations at the Site. Moreover, based on our review of the available materials, it appears that there are a number of potentially responsible parties ("PRPs") associated with the alleged dioxin contamination at and in the vicinity of the Site that have not been issued notice letters. These PRPs include upstream generators and disposers of dioxin-containing materials, companies that arranged with New England Container Corporation for treatment or disposal of contaminated drums at the Site, companies and individuals involved in the development of the property, and the owner or owners of the riverbed and areas adjacent to the Woonasquatucket River which allegedly contain elevated levels of dioxin. Apparently elevated levels of dioxin in the vicinity of the Site have only recently been detected, raising serious questions regarding the source of the contamination and when the contamination occurred.

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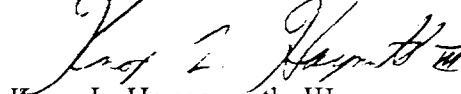
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Notwithstanding the foregoing, the Company is prepared to enter into good faith negotiations with the Agency to resolve its alleged liability, and would like to schedule a meeting with EPA at the earliest mutually-agreeable time. We have been able to locate a number of historical documents that we believe will not only establish, to EPA's satisfaction, that Crown Metro should not be considered a PRP, but such information will detail additional corporations and individuals who should be the focus of the agency's efforts. I will serve as the contact person on behalf of Crown Metro, Inc. for purposes of our discussions. I can be reached at (864) 271-7424.

With best regards, I remain

Sincerely,

BROWN, MASSEY, EVANS, McLEOD
& HAYNSWORTH, P.A.



Knox L. Haynsworth, III

KLH:ro

cc: ✓ Catherine Garypie, Esq. (via facsimile and certified mail)