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March 9, 1988

By Hand

Ms. Gretchen Muench
Office of Regional Counsel
U. S. Environmental Protection Agency
J.F.Kennedy Federal Building
Boston, MA 02203

Re: Request for Information Pursuant to Section 104 of CERCLA and Section 3007 of RCRA, for certain activities occurring at the Wildwood Conservation Corporation property and the Wedel Corporation property, located on Salem Street in Woburn, Massachusetts, referred to as "the Facility"

Dear Gretchen:

I am writing to follow up on our telephone conversation of yesterday. I have talked with Beatrice's in-house counsel, Carol Gavin, and, unless there is some unforeseen problem, I expect that Beatrice will be able to provide you with the information requested concerning the ownership and financial condition of the relevant corporate entity on Monday, March 14, 1988. Based on our conversation, I understand this to mean that Beatrice will answer Questions 1, 2, 3, 4, 8, 9, 10, 13, and 21 through 26.

I also understand from our conversation that you are not requiring Beatrice to answer the remaining questions contained in the information request by March 14 pending further consideration by you of the matters discussed yesterday.

As we discussed yesterday, the person in charge of the day-to-day operations of the Riley tannery when it was owned by Beatrice was John J. Riley, Jr. On behalf of Wildwood Conservation Corp. and John J. Riley Company, Inc., he has already answered questions identical to those addressed to Beatrice. Beatrice does not believe it has any employees with any personal knowledge about tannery operations or alleged activities on the Wildwood Conservation Corp. property. The only other source of information which Beatrice may have is that which was developed during the discovery and trial of the Anderson, et al v. Cryovac,



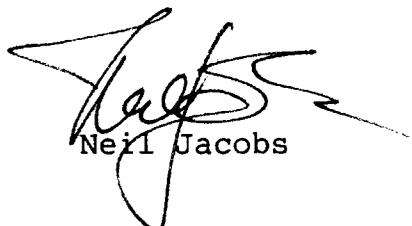
Ms. Gretchen Muench
Page 2
March 9, 1988

Inc., et al case. As I explained, Beatrice's view is that it is neither manageable nor fair to try to impose upon Beatrice the burden of summarizing the massive amounts of disputed information which was developed during the Anderson case.

If the EPA wishes to arrange to view any of the discovery or trial materials, we would be happy to cooperate. In any event, you and I have left it that you are going to consider whether there are any alternatives which would permit Beatrice to provide information concerning the release of hazardous wastes at the facility in a more manageable and useful way than simply offering access to the Anderson materials.

I look forward to working with you on this matter.

Sincerely,



Neil Jacobs

NJ:jcd

cc: Carol Coghlan Gavin, Esq.