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August 17, 1995

Ms. Carolyn Kwan
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Re: Tutu Wellfield Superfund Site
Our File No. 05120.24094

Dear Ms. Kwan and Mr. Praschak:

On behalf of our clients, we write concerning the United States Environmental Protection Agency's ("EPA") identification of Potentially Responsible Parties ("PRPs") for the Tutu Wellfield Superfund Site.

We bring to your attention the existence of a number of individuals who may qualify as PRPs under CERCLA but have not been identified by the EPA as PRPs. Specifically, we refer to the officers, directors, partners, and shareholders of Four Winds Plaza Partnership, L'Henri, Inc., Western Auto Repair, Tillet Gardens, and Ramsey Motors, Inc. Under CERCLA, individuals who had the ability to control or direct

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Ms. Carolyn Kwan and
Mr. Andrew L. Praschak
August 17, 1995
Page 2

the waste handling, treatment, storage or disposal of hazardous materials at facilities within the Tutu Wellfield Superfund Site qualify as PRPs.

To our knowledge, no effort has been made by EPA to identify these individuals as PRPs, despite the fact that you advised all of those present on June 12, 1995, at the PRP meeting in New York, that you had read all of the deposition testimony and other filed documents in the PID/Harthman litigation pending before Judge Brotman.

It is in the public interest that all potentially responsible parties be named in the EPA proceedings. With this in mind, we urge you to identify, as PRPs, the officers, directors, partners and shareholders of Four Winds Plaza Partnership, L'Henri, Inc., Tillet Gardens, Western Auto Repair, and Ramsey Motors, Inc., which may include, but are not limited to, the following persons: Frank Bonanno, Joseph Bonanno and Vincent Bonomo - Four Winds Plaza Partnership; Leo T. Barbel and Henry L. Magras - L'Henri, Inc.; Boris Tillet, James Tillet, Rhoda Tillet and Eric Tillet - Tillet Gardens; Rita Ramsey - Ramsey Motors, Inc.; and John Leeach - Western Auto Repair.

This letter is not intended as a response to the PRP letters issued by the EPA on August 3, 1995 to Laga Industries, Ltd., The Duplan Corporation and Panex Industries, Inc. Under separate cover, we shall specifically respond to such letters.

We request that you give this matter your earliest attention.

Should you need any additional information, please do not hesitate to call us.

Very truly yours,

John M. Newman

JMN:DMS:prc

cc: All counsel on attached list