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February 10, 1988

Ellen M. Mahan
Trial Attorney
Environmental Enforcement Section
U.S. Department of Justice
P.O. Box 7415
Washington, D.C. 20044-7415

FEB 16 1988
REGION I
OFFICE OF REGIONAL COUNSEL

Re: United States, et al. v. AVX Corp., et al.

Dear Ms. Mahan:

This letter confirms our telephone conversation yesterday that you and other representatives of the United States and the Environmental Protection Agency ("EPA") have agreed to meet with defense counsel concerning the pilot dredging project on February 18, 1988 in Boston at 1:30 p.m. Counsel for AVX has offered to make the offices at Nutter, McClennen & Fish available for the meeting. You agreed to confirm by letter whether the meeting would be held at Nutter or at the JFK Building in Boston.

During our conversation, I also commented on your letter to me of February 4, 1988. In your letter, you state that the United States is willing to meet with defense counsel to discuss their participation in the RI/FS process, but that such a meeting would be productive only if defense counsel can first provide you with a specific proposal. I pointed out that defense counsel believe that submission of a specific proposal is not necessary to a fruitful discussion of our participation in the RI/FS process. What we are in general requesting is an on-going opportunity to interact on important technical issues as developments occur. Such interaction, of course, is necessarily dependent on timely access to EPA data and reports. These are concepts that we have advanced before, and a discussion of them in the context of the pilot dredging project would help develop them further.

Ellen Mahan, Esq.
February 10, 1988

Page 2

I look forward to the meeting on February 18.

Very truly yours,



Janine M. Sweeney

cc: Paul Galvani
Daniel Gleason
David McLaughlin
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William D. Brighton
✓ Charles Bering
Colene Gaston