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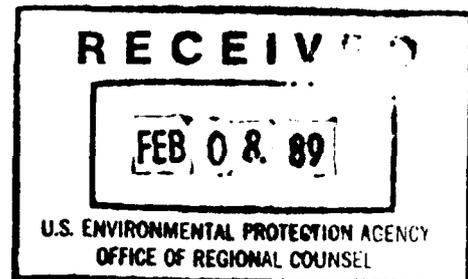
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58370
Date: New York
Time: 11:17
Other: Aerovox

January 23, 1989

Ellen M. Mahan, Esq.
U.S. Department of Justice
Environmental Enforcement Section
Land and Natural Resources Division
Room 1742 R
9th and Pennsylvania Avenue, N.W.
Washington, DC 20530



Dear Ellen:

This is in response to Judge Young's order of December 23, 1989 on December 23, 1989.

It is not anticipated that the trial experts of Aerovox Incorporated will base their testimony, in whole or in part, on the 1983 ASA reports or the Heavers Appendix thereto. Accordingly, the documents described in paragraphs 1 and 2 of the order will not be produced. A copy of the tidal flow measurement data referenced in paragraph 3 is being sent to you herewith, although I believe you already have it.

With respect to John Brown's work, it is my understanding that you previously have received the chromatograms for the sediment samples. Indeed, a set was sent by Dr. Brown to your Dr. Lake at the Narragansett laboratory in November. I have asked Dr. Brown to send to Dr. Lake the protocols for his laboratory work and the chromatograms for the water samples that were collected on December 22, 1986. The analyses of the water samples were never completed, and it is not now anticipated that Dr. Brown will testify about them, but I have asked him to send them along nonetheless.

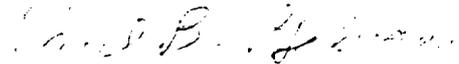
Finally, I am enclosing herewith another set of the GHR documentation and the protocols for its sediment sampling. I do not understand your request for "computer tapes and the documentation for the computer programming and file structure." If you could elaborate, perhaps I could furnish

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what you want, but it is not anything that Dr. Brown intends to testify about.

There is nothing to produce in response to paragraph 7, although I am enclosing a redacted copy of Dr. Brown's September, 1986 draft report as previously promised.

Very truly yours,



Paul Galvani

PBG/dfs

cc: Ms. Nancy E. Preis
Charles C. Bering, Esq.
Mary K. Ryan, Esq.
David A. McLaughlin, Esq.
Verne W. Vance, Jr., Esq.