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September 4, 1981

Hon. John T. Curtin
United States District Court
U. S. Court House
Buffalo, New York 14202

Re: United States, et al v. Hooker Chemicals
Corporation, et al (Hyde Park Landfill)
(Civil 79-989)

Dear Judge Curtin:

In accordance with the Order of the Court, dated August 12, 1981, we set forth below the names of the two principal witnesses Hooker intends to present at the factual hearing scheduled to commence September 9, 1981, with a brief summary of their proposed areas of testimony. Attached for the information of the Court and participants are resumes for each witness.

A. DR. PHILIP L. LEVINS

Dr. Levins is presently Vice-President and Manager of the Analytical and Environmental Chemistry Section of Arthur D. Little, Inc., Cambridge, Massachusetts.

Dr. Levins will testify on the following subjects:

1. Surveys and Indicator Chemicals

Dr. Levins will explain the use of indicator chemicals in conducting the soil surveys, the plume definition, the sediment monitoring, the monitoring of collection systems effectiveness, and the Bloody Run monitoring, required by the proposed Settlement Agreement.

2. Treatment of Liquids Collected at the Landfill and Spent Media

Under the proposed Settlement Agreement, leachate collected at the landfill site by one of the barrier

Hon. John T. Curtin

- 2 -

September 4, 1981

collection systems must be treated prior to discharge into the environment (pages I-25-36). The proposed Settlement Agreement requires the use of an activated carbon treatment system. Dr. Levins will testify on the various technologies considered for treatment of collected leachate and the reasons for selection of the carbon filtration system and will describe its operation.

In addition, Dr. Levins will explain how the system will be monitored to insure that the leachate is properly treated.

3. Disposal of Treatment Residue

Dr. Levins will describe the technologies to be applied under the proposed Settlement Agreement for disposition of residues which are generated during the treatment process.

B. FRANK A. ROVERS

Mr. Rovers is a professional engineer and hydrogeologist and presently a principal in the engineering firm of Conestoga-Rovers & Associates Limited, Waterloo, Ontario, Canada.

Mr. Rovers will testify on the following subjects:

1. Existing Remedial Work at the Hyde Park Landfill

Prior to 1980, certain remedial work was undertaken to address environmental conditions at the Hyde Park landfill site. Mr. Rovers will describe the specific remedial actions which were taken at the site.

2. Lagoon Operation

Under the proposed Settlement Agreement, certain actions must be taken regarding the lagoons presently existing at the landfill site (pages I-33-34). Mr. Rovers will discuss the present condition and operation of these lagoons and their anticipated use under the proposed Settlement Agreement.

*Toe drains (2) failed
to prevent leachate
break -
now dispo-
copping -*

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Hon. John T. Curtin

- 3 -

September 4, 1981

3. Termination of Operation of
Barrier Collection Systems

The proposed Settlement Agreement provides that, once installed, operation of a barrier collection system or a component thereof may be terminated under certain specified conditions (pages III-1-2). Mr. Rovers will describe the type of specific factual circumstances under which all or part of a barrier collection system may be terminated.

4. Description of "Sponge Pig" and
"Porcupine" Used in Bloody Run Area
Cleaning

The proposed Settlement Agreement refers to the use of a "sponge pig" and "porcupine" in clean-up activities in the Bloody Run area (page I-45). Mr. Rovers will describe these cleaning tools and explain their use.

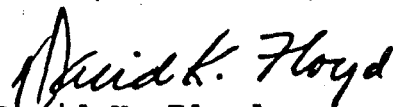
5. Evaluation of Containment Program

Mr. Rovers will explain the bases for his opinion that the containment Program described in the Agreement is appropriate to collectively address conditions in the Hyde Park-Bloody Run area.

Very respectfully yours,

PHILLIPS, LYTLE, HITCHCOCK, BLAINE & HUBER

By


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KKz
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PHILIP L. LEVINS

B.S., University of Vermont

Ph.D., Physical-Organic Chemistry, University of New Hampshire

Post-Doctoral Fellow, Pennsylvania State University

Arthur D. Little, Inc., 1961-

Dr. Levins is a Vice President of Arthur D. Little, Inc. and Manager of the Analytical and Environmental Chemistry Section.

AREAS OF SPECIALIZATION

Analytical Chemistry

Air and Water Pollution Analysis

Industrial Hygiene Analysis

Source and Ambient Sampling

RELATED EXPERIENCE

Dr. Levins has been responsible for the Analytical Section conducting the experimental environmental programs at Arthur D. Little for the past several years. He has directed several large multi-disciplinary programs at Arthur D. Little including studies staffed entirely by Arthur D. Little staff members and programs involving subcontract team efforts with other research organizations.

Dr. Levins was in charge of a diesel exhaust odor program which came to a successful completion after five years of research involving a multi-disciplinary research team and coordination with a seven-member client steering committee. He directed a field and laboratory test program involving the incineration of industrial wastes at several sites across the country--this was a team program. He has managed the Arthur D. Little portion of the long-term ADL/SRI International program to develop sampling and analysis methods for NIOSH. The three-year multi-task program for the measurement of organic species in environmental samples was managed by Dr. Levins. He is directing the EPA study to identify sources of priority pollutants in POTW's.

He has conducted research in many of the areas of environmental concern. These studies include identification of the chemical species responsible for the characteristic odor of diesel exhaust, characterization of secondary waste effluent, incinerator particulate and gas analysis, ambient air sampling, trace metals analysis, pesticide residue determination, and fundamental studies on nitrogen oxides oxidation and analysis. In the diesel odor program, he has applied the full range of modern instrumental analysis methods to obtain a complete detailed description of the organic compounds in the exhaust derived from both the fuel and partial combustion products.

PHILIP L. LEVINS (Continued)

He has developed new analysis methods for PAH and PCB contaminants and has applied his general knowledge of analytical methods to a wide range of industrial chemicals.

He has directed air quality surveys and analyses and studies of salting effects on water quality.

The results of his research have led to numerous publications and patents. He is a member of the Sigma Xi Society, American Chemical Society, the American Association of the Advancement of Science, the American Society of Mass Spectroscopists, the American Society of Testing and Materials, and the Air Pollution Control Association.