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AN ENVIRONMENTAL AND ENERGY LAW PRACTICE

25th ANNIVERSARY

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Admitted in PA and NJ

March 3, 2014

Via Electronic (Benton.marvin@epa.gov) and
Certified Mail – Return Receipt Requested
Marvin Benton, Esquire
Assistant Regional Counsel (6RC-S)
United States Environmental Protection Agency – Region 6
1445 Ross Avenue
Dallas, TX 75202-2733
Benton.marvin@epa.gov

Re: Cedar Chemical Corporation Site, West Helena, Phillips County, Arkansas

Dear Mr. Benton:

I am writing in response to EPA's December 31, 2013 Special Notice Letter directed to Rohm and Haas Company, requesting Rohm and Haas's participation in good-faith negotiations to enter into a consent order to perform a Remedial Investigation/Feasibility Study at the Cedar Chemical Corporation Site in West Helena, Arkansas (the "Site"). Pursuant to a telephone conversation with Mr. Lance Nixon on January 27, 2014 and a subsequent email from you on January 29, 2014, EPA agreed to extend Rohm and Haas's deadline to respond to the Special Notice Letter until March 3, 2014.

After careful evaluation of Rohm and Haas's alleged liability at and nexus to the Site, Rohm and Haas is not prepared to enter into the requested negotiations with EPA. Unlike the toll processing arrangements that we understand other PRPs may have had with the Site, Rohm and Haas's relationship was limited to sales agreements for propanil products that were manufactured at the Site. Rohm and Haas never transported or arranged for the disposal of hazardous substances in connection with these agreements or otherwise, and thus is not a liable party under CERCLA.

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Should you have any questions, please do not hesitate to contact me. Thank you for your time and attention to this matter.

Sincerely,

Kathleen B Campbell

Kathleen B. Campbell
For MANKO, GOLD, KATCHER & FOX, LLP

KBC/kl
cc: Mr. Lance Nixon, EPA Region 6 (via electronic mail)