Message

From: Tuori, Thomas [ttuori@hselaw.com]
Sent: 11/14/2017 6:08:22 PM
To: Ludmer, Margo [ludmer.margo@epa.gov]; Daly, Eric [Daly.Eric@epa.gov]
Subject: RE: Documentation re: Niagara Falls Boulevard Site [HSELAW-WORKSITE.FID715352]

Hi Margo,

I agree -- I think a call makes sense. I am available tomorrow except for 12 to 1:30.

Thank you,
Tom

Thomas M. Tuori
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From: Ludmer, Margo [mailto:ludmer.margo@epa.gov]
Sent: Tuesday, November 14, 2017 12:24 PM
To: Tuori, Thomas; Daly, Eric
Subject: RE: Documentation re: Niagara Falls Boulevard Site [HSELAW-WORKSITE.FID715352]

Hi Tom,

We can certainly provide you with the requested documentation; however, I think it would be helpful to discuss in more detail what you and your clients do/do not already have. We have quite a lot of data from the years that you have specified. What is your availability tomorrow for a call with Eric and me?

Thank you,
Margo

Margo B. Ludmer
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Office of Regional Counsel
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(212) 637-3187

From: Tuori, Thomas [mailto:ttuori@hselaw.com]
Sent: Monday, November 13, 2017 10:23 AM
To: Daly, Eric <Daly.Eric@epa.gov>; Ludmer, Margo <ludmer.margo@epa.gov>
Subject: Documentation re: Niagara Falls Boulevard Site [HSELAW-WORKSITE.FID715352]

Hi Eric and Margo,

I hope you have both been well.

As you may have heard, we initiated our litigation in October. We are representing 28 plaintiffs who own and/or operate/occupy 32 separate parcels. Our plaintiffs include the owners/operators of all of the impacted parcels at the Niagara Falls Boulevard Site (other than the church); Mr. Raymond, Mr. Wade, and Mr. & Mrs. Michaels on Robert St.; Talarico Bros. Building Corp., Mr. Grace, and the Lozinas (who own/occupy 728 Upper Mountain Road).

In the process of reviewing EPA information about our plaintiffs' properties, I realized that we have very little information and documentation from the EPA's recent work at the Niagara Falls Boulevard properties. Other than the gamma survey data summarized on the attached map, we don't have any results or other documentation from work done in 2015, 2016 or 2017. For example, we have no results from indoor gamma surveys, outdoor sampling of soil/slag, radon sampling or any indoor sub-slab sampling of soil/slag (if conducted).

Are you available for a quick call to discuss this issue? I am generally available this week other than Friday.

Thank you,
Tom

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