EASTMAN & SMITH LTD.
ATTORNEYS AT LAW
Established 1844

David W. Nunn
Attorney at Law
Direct Dial: 419-247-1672
dwnunn@eastmansmith.com

One SeaGate, 24th Floor
P.O. Box 10032
Toledo, Ohio 43699-0032
Telephone: 419-241-6000
Facsimile: 419-247-1777

March 19, 2015

VIA ELECTRONIC MAIL ONLY

Lauren P. Charney, Esq.
Assistant Regional Counsel
New York/Caribbean Superfund Branch
Office of Regional Counsel, EPA Region 2
290 Broadway, 17th Floor
New York, NY 10007-1866

Re: Lower Ley Creek Subsite of the Onondaga Lake Superfund Site
Notice Letter to Perform Remedial Design

Dear Ms. Charney:

We are writing in response to U.S. EPA's notice letter of March 3, 2015 regarding the performance of a Remedial Design at the Lower Ley Creek Subsite. This letter responds to that notice letter on behalf of the following parties who have expressly authorized their inclusion in this response:

Carrier Corporation
City of Syracuse, NY
Cooper Crouse-Hinds LLC
Niagara Mohawk Power Company, d/b/a National Grid
Onondaga County, NY
Syracuse China Company

Please be advised that the foregoing entities (the "Responding Parties") are willing to negotiate with U.S. EPA the performance of the design of the remedy selected in the Record of Decision for the Lower Ley Creek Subsite.

The Responding Parties acknowledge that any agreement by which they would consent to undertake the performance of the Remedial Design for the Lower Ley Creek Subsite would need to be memorialized in an Administrative Order on Consent issued by U.S. EPA under CERCLA. As you know, the Responding Parties have already engaged in legal and technical discussions

with U.S. EPA on the performance of the requested Remedial Design, including submitting documents setting forth potential terms and conditions for completing this work. The Responding Parties are willing to continue their negotiations in good faith with U.S. EPA on these issues, as well as the issue of how and when the General Motors settlement funds will be applied to this Subsite, with the goal of reaching final agreement with U.S. EPA on mutually acceptable terms of performing the Remedial Design.

Nothing in this letter constitutes a commitment by the Responding Parties to undertake the performance of the Remedial Design for the Lower Ley Creek Subsite unless and until such commitment is memorialized in a final Administrative Order on Consent and Scope of Work executed by U.S. EPA and each Responding Party who agrees to perform the work. Additionally, nothing herein constitutes an admission of any fact or legal responsibility, fault, or liability on behalf of the Responding Parties, individually or collectively, and the Responding Parties reserve all of their rights to contest the allegations contained in U.S. EPA's notice letters. Lastly, U.S. EPA has not issued notice letters to all potentially responsible parties relating to the Lower Ley Creek Subsite and, accordingly, the Responding Parties reserve all of their rights relating to such other potentially responsible parties, as well as U.S. EPA's failure to issue notice letters to those parties at this time.

Please let the representatives of the Responding Parties know if you require anything further at this time.

Very truly yours,

EASTMAN & SMITH LTD.

David W. Nunn

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Enclosures
cc: Responding Party

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