Atty-Client

— Inf. Confid —

Mike
Scott
Dan
Richard

Surry downs 2-2-05

19 violations ~$70K

Option - Settle before compl issued?
pre-settlement

Vulh
penalty amts are consist w/ policy
3 wks wait from notif to us inspecting
actual vs perceived risk (health)

50 ppm reg threshhold
all samples showed PCBs - some very high

Mike - confer w/ Ron on path presettle or not

Richard - could have Compl or CAFO ready by Feb 14

2-14-05
mtg w/ RA Ron, Mike, Scott Richard, Dan, Dave T.
new - Operator not bankrupt, has agents

Can show draft of complaint
Ron - opp to confer - pre filing
- our choice - KC + OP or just KC