REDACTED VERSION

WILLIAMS & ROME, LLC
Attorneys at Law

Sharon M. Williams
Gregory W. Rome

2413 Pakenham Drive
Chalmette, La. 70043

Telephone (504) 875-4397
Facsimile (504) 875-4402

Via Certified Mail — 7011 2970 0002 0810 1478 October 31, 2012
Mr. Robert Werner, Enforcement Officer
Superfund Enforcement Assessment Section (6SF-TE)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

RECEIVED
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DIV.
OFC.

Re: Delta Superfund Site, Houma, Terrebonne Parish, La.
SSID No. 06GC

Dear Mr. Werner,

I represent (b) (6)(b) (6) to whom you recently sent a set of requests for information. I have prepared the enclosed responses on (b) (6) (b) (6) behalf.

Unfortunately, (b) (6) cannot provide much help to your investigation. He is nearly 89 years old and has severe memory and other cognitive problems. (b) (6) memory loss and cognitive impairment are consistent with the onset of Alzheimer's Disease.

I'm very sorry that I cannot provide you with more information about the former Delta site. But if I can be of any other assistance, please call my office.

Yours sincerely,

Gregory W. Rome

Enclosure: Dean's responses

9336061

Responses to Delta Shipyard Superfund Site

Information Request

A. Please answer the below questions, If you choose to have someone answer these questions for you, please ask that person(s) to include their address, phone number, and e-mail address along with your response to this letter.

Response A
These questions will be answered on behalf of (b) (6) by his attorney, Gregory W. Rome. Mr. Rome's contact information is below:

Gregory W. Rome
Williams & Rome, L.L.C.
2413 Pakenham Drive
Chalmette, LA 70043
Telephone: (504) 875-4397
Email: gwrome@williamsandrome.com

B. Were you ever employed by one or more of the following business entities? If your answer to this question is yes, please explain.

1. Any corporate entity known as Delta Iron Works, Inc. (DIWI) or any of its associated business entities that operated a boat and barge cleaning and repair facility at the Site.

   Response B(1)
   No.

2. Any corporate entity known as Chromalloy American Corporation (CAC) or any of its associated business entities that operated a boat and barge cleaning and repair facility at the Site.

   Response B(2)
   No.

3. The Louisiana partnership known as Delta Services Industries (DSI) or any of its associated business entities that operated a boat and barge cleaning and repair facility at the Site.

   Response B(3)
   No.

4. Delta Services, Inc. or Granite Capital Corporation, both being partners of Delta Services Industries (DSI) that, via one of its associated business entities, operated a boat and barge cleaning and repair facility at the Site.

Response B(4)
No.

5. The non-incorporated business entity known as Delta Shipyard (DS) that operated a boat and barge cleaning and repair facility at the Site.

Response B(5)
No.

C. Do you have knowledge of any boat and barge cleaning and repair activities that occurred at the Site. If your answer to this question is yes, please explain.

Response C
(b) (6) has no personal knowledge of any boat and barge cleaning and repair activities that occurred at the Site. Dean Boats, Inc., a company owned by (b) (6) purchased the property from Delta Services Industries's bankruptcy estate on April 8, 1986. By that time, DSI had ceased operations at the Site. In 1989, Dean Boats, Inc., transferred the property to (b) (6) himself.

D. Do you know the names of any business entities that brought tanks, boats, barges, and/or floating objects (hereafter referred to as "equipment") to the Site to be cleaned and/or repaired? If your answer to this question is yes, please provide the names of the business entities.

Response D
(b) (6) has no personal knowledge of any business that brought equipment to the Site to be cleaned or repaired. (b) (6) did not acquire the property until after DSI had ceased operations.

E. Did you, or any did business entity you control or manage, contract with or arrange with any business entity described in question B to clean and/or repair equipment at the Site prior to 1986?

Response E
No.

F. According to public records, on April 8, 1986, Dean Boats, Inc., purchased a 110.2759 acre tract of land from W. Simmons Sandoz, Trustee for the estate of Delta Services Industries. The Site is located on a part of this 110.2759 are tract of land. On March 31, 1989, the incorporators and directors of Dean Boats, Inc., approved the transfer of the 110.2759 acre tract of land from Dean Boats, Inc., to (b) (6)(b) (6) Please answer the following questions that pertain to the described land purchase and land transfer.

1. During the period between April 8, 1986, and March 31, 1989, do you have any knowledge of any materials, hazardous materials, hazardous substances, and/or hazardous wastes that were brought to, or left in, any of the pits at the Site? If your answer to this question is yes, please explain.

   Response F(1)
   No.

2. During the period between March 31, 1989, and the date of this letter, do you have any knowledge of any materials, hazardous materials, hazardous substances, and/or hazardous wastes that were brought to, or left in, any of the pits at the Site? If your answer to this question is yes, please explain.

   Response F(2)
   No.

3. During the period between April 8, 1.986, and March 31, 1989, was Dean Boats, Inc. the sole owner of the part of the 110.2759 acre tract of land upon which the Site is located? If your answer is no, please explain.

   Response F(3)
   Yes.

4. During the period between March 31, 1989, and the date of this letter, have you been the sole owner of the part of the 110.2759 acre tract of land upon which the Site is located? Please answer yes or no. If your answer is no, please explain.

   Response F(4)
   Yes. The Agency should note that the tract is community property.

5. As of the date of this letter, are you the sole owner of the part of the 110.2759 acre tract of land upon which the Site is located? Please answer yes or no. If your answer is no, please explain.

Response F(5)

Yes, (b) (6) owned the tract as community property on the date of the letter. But (b) (6)(b) (6) are in the process of completing their estate plan and recently transferred ownership of the 110.2759 acre tract of land upon which the Site is located to Dean Services West, L.L.C., and C&H Canal Lands, L.L.C., as part that estate plan. Both are Louisiana limited liability companies presently owned exclusively by (b) (6)(b) (6) Interests in the companies will soon be transferred as part of their estate plan, but (b) (6) will retain control of the entities.

WILLIAMS & ROME, LLC
2413 PAKENHAM DRIVE
CHALMETTE, LA. 70043

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MR. ROBERT WERNER, ENFORCEMENT OFFICER
Superfund Enforcement Assessment Section (6SF-TE)
U.S. EPA, Region 6
1445 Ross Avenue
Dallas, TX 75202-2733

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