

ENVIRONMENTAL APPEALS BOARD
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C.


In re:)
Land O' Lakes, Inc. (Hudson Oil Refinery) CERCLA § 106(b) Petition No. 15-01
Superfund Site))
Docket No. 06-16-08)
_____)

RESPONSE ADDRESSING PREREQUISITES FOR REVIEW

After thorough review and analysis, and discussion within the Office of General Counsel, and the Office of Site Remediation and Enforcement, the Respondent, EPA, is not filing a response addressing prerequisites for Environmental Appeals Board (the Board) review. It is our understanding from the Board's Order of September 18, 2015, that the Board anticipates ruling on the pending Agreed Motion to Stay Proceedings prior to the due date of the merits response. We further understand that the merits response and accompanying certified index and copies of documents are currently due on November 20, 2015.

Dated this 15th day of October 2015.

Respectfully submitted,



Clarence Featherston

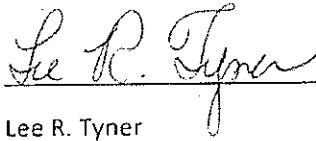
Office of Enforcement and Compliance Assurance

U.S. EPA (2272A)

1200 Pennsylvania Avenue. NW

Washington, DC 20460

202.564.4234, FAX 202.501.0269



Lee R. Tyner

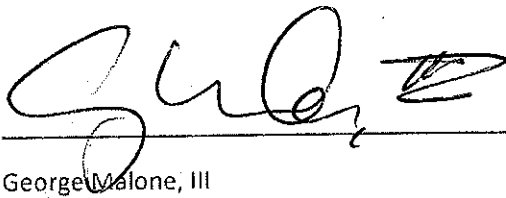
Office of General Counsel

U.S. EPA (2366A)

1200 Pennsylvania Avenue, NW

Washington, DC 20460

202.564.5524, FAX 202.564.3711



George Malone, III

Assistant Regional Counsel

Office of Regional Counsel (6RC-5)

U.S. EPA, Region 6

1445 Ross Avenue

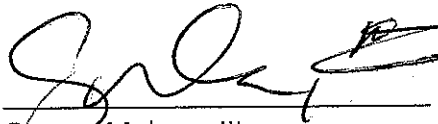
Dallas, TX 75-202-2733

214.665.8030, FAX 214.665.6460

CERTIFICATE OF SERVICE

I hereby certify that on the 15th of October, 2015, I served a true and correct copy of the above response by mailing a copy via first class United States Mail to:

Byron E. Starns, Esq.
Stinson Leonard Street LLP
150 South Fifth Street, Suite 2300
Minneapolis, MN 55402


George Malone, III