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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
ENVIRONMENTAL APPEALS BOARD 2007 AUG -3 PM 2: 57

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In re : ENVIR. APPEALS BOARD
: :
LEOMINSTER WATER POLLUTION : Appeal No. 06-16
CONTROL FACILITY : :
: :
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1140 Connecticut Avenue, NW.
Washington, D.C.

Thursday, June 21, 2007

The HEARING in this matter began at
approximately 11:00 a.m. pursuant to notice.

BEFORE:

JUDGE SCOTT FULTON

2

1 APPEARANCES:
 2 On behalf of Environmental Protection Agency:
 3 EURIKA DURR, Clerk of the Board
 4 Environmental Appeals Board
 5 Environmental Protection Agency
 6 1341 G Street, NW., Suite 600
 7 Washington, D.C. 20005
 8 (202) 233-0122

9 On behalf of EPA Region I:
 10 JOSHUA CADITZ, ESQUIRE
 11 Environmental Protection Agency, Region I
 12 1 Congress Street, Suite 1160
 13 Boston, Massachusetts 02114
 14 (617) 918-1787

15 On behalf of City of Leominster:
 16 JEFFREY BLAKE, ESQUIRE
 17 Kopelman & Paige
 18 101 R Street
 19 Boston, Massachusetts 02110
 20 (617) 556-0007

21 * * * * *

22

4

1 our systems difficulties. It is our
 2 preference to do the status calls through
 3 video conferencing or in person so that we
 4 can see one another, but in view of the fact
 5 that the system's down, this is the best --
 6 the best we can do today, so thank you for
 7 your flexibility and -- and working with
 8 those difficulties.

9 The way that I'd like to proceed is
 10 just to simply hear from the parties in turn.
 11 I think maybe starting with the Petitioner,
 12 the City of Leominster, and then I would like
 13 to hear from the Region -- and, so perhaps
 14 then, Mister -- Mr. Blake, you can start us
 15 off, and if you could speak to those two
 16 questions. One being the current status of
 17 the negotiations as you see it, and, second,
 18 whether this is on a promising track for
 19 resolution and how much time will be needed
 20 to accomplish that.

21 MR. BLAKE: Yes, Your Honor.
 22 Jeffrey Blake for the City of Leominster.

3

1 PROCEEDINGS
 2 JUDGE FULTON: Gentlemen, welcome
 3 to you. We're going to be doing this on the
 4 record this morning. Mr. Bryce will be
 5 serving us, our court reporter. And we're
 6 here today pursuant to the Board's order of
 7 May 4 of this year, and the purpose of this
 8 status conference is twofold.

9 First, we want to hear from the
 10 parties regarding the current status of your
 11 settlement negotiations. And, second, we
 12 want to determine whether additional time
 13 here is likely to lead to resolution of this
 14 matter.

15 We're coming up on the anniversary
 16 date for this permit, and are thus interested
 17 in seeing whether it can expeditiously be
 18 resolved through settlement or whether we
 19 need to move it on to a path that allows for
 20 resolution by the Board.

21 I want to thank -- thank you all
 22 for your flexibility and -- and working with

5

1 And with -- with respect to the
 2 status of -- of the matter, we are -- I think
 3 I can report that we have reached an
 4 agreement in principal, and there's some
 5 minor -- minor points in language in -- in
 6 certain clauses of a -- of a compliance order
 7 and a compliance schedule that need to be
 8 worked out, but I -- I can -- I think I can
 9 report with confidence that we will work
 10 these things out, and it looks like we will
 11 have this -- we will have reached an
 12 agreement probably -- I would like until the
 13 end of July only because of the -- the next
 14 coming month being a summer month, I -- I
 15 anticipate that we will have -- it will flow
 16 down in some of my approval since there's
 17 probably vacations going on.

18 JUDGE FULTON: Very well, Mr.
 19 Blake. Anything else you -- you want to add?

20 MR. BLAKE: I don't think so, Your
 21 Honor.

22 JUDGE FULTON: Okay. Mister -- Mr.

6	<p>1 Caditz?</p> <p>2 MR. CADITZ: Yeah, Mr. Blake</p> <p>3 accurately described the matter we have made</p> <p>4 considerable progress and there's just a</p> <p>5 handful of aspects of the administrative</p> <p>6 order that remain to be resolved.</p> <p>7 JUDGE FULTON: Can you give me a --</p> <p>8 a flavor of the types of issues we're talking</p> <p>9 about with the form of the order?</p> <p>10 MR. CADITZ: We're still in the</p> <p>11 progress of discussing interim measures that</p> <p>12 would apply before the end of the compliance</p> <p>13 schedule when the 2006 limits would go into</p> <p>14 effect or it would be enforced. We have been</p> <p>15 discussing essentially some re-opener</p> <p>16 language that we came to a resolution early</p> <p>17 this morning. Those are the -- the sort of</p> <p>18 matters we'll be working with.</p> <p>19 JUDGE FULTON: So, the interim</p> <p>20 measures -- or that's the feature of the</p> <p>21 compliance schedule that -- that you're</p> <p>22 developing?</p>	8	<p>1 council, excuse me.</p> <p>2 JUDGE FULTON: Okay. Yeah, I noted</p> <p>3 that in your status report, you were asking</p> <p>4 until July 13. I guess what -- what Mr.</p> <p>5 Blake is saying is that even after you all</p> <p>6 have arrived at what you think is a workable</p> <p>7 resolution here, the -- the approval process</p> <p>8 for the -- for the city is -- yeah. The city</p> <p>9 might take a few more weeks beyond that time.</p> <p>10 MR. BLAKE: That's -- that's true,</p> <p>11 Your Honor. What -- what -- I -- I've kept</p> <p>12 the city apprised and the plant manager has</p> <p>13 been involved in the negotiations all the way</p> <p>14 through, and he kept city council apprised,</p> <p>15 but when we get a final agreement, I need to</p> <p>16 bring it to the city council for their final</p> <p>17 approval.</p> <p>18 And, like I said before, I'm just a</p> <p>19 little worried that during July, I may have</p> <p>20 trouble getting a quorum together, especially</p> <p>21 early in the month of July, being the Fourth</p> <p>22 of July holiday. And that's why I'm -- just</p>
7	<p>1 MR. CADITZ: Yes.</p> <p>2 JUDGE FULTON: I see. And the</p> <p>3 issues that divide the parties are really</p> <p>4 just a question of drafting or do you think</p> <p>5 there -- there are conceptual difficulties</p> <p>6 still?</p> <p>7 MR. CADITZ: In terms of the</p> <p>8 interim measure, we -- it remains to be seen</p> <p>9 whether or not the -- the issues will be</p> <p>10 substantive. It -- it -- I think will</p> <p>11 primarily be of drafting, but there -- there</p> <p>12 could be some -- some issues with the types</p> <p>13 of measures applied, as well.</p> <p>14 JUDGE FULTON: Okay. And the</p> <p>15 timeframe that Mr. Blake mentioned, is this</p> <p>16 one that would work, for the region, as well?</p> <p>17 MR. CADITZ: Yes, I -- I'm very</p> <p>18 hopeful that we will come to a resolution on</p> <p>19 the issue that I've been describing in the</p> <p>20 next few weeks. And then it would be a</p> <p>21 matter of -- of Mr. Blake being able to get</p> <p>22 approval from the town council. City</p>	9	<p>1 would like the additional couple of weeks</p> <p>2 just to be sure that I can have everything</p> <p>3 buttoned up.</p> <p>4 JUDGE FULTON: Okay. And, Mr.</p> <p>5 Blake, is -- I don't want to push beyond the</p> <p>6 bounds of your representational limits here,</p> <p>7 but if -- if we were to establish a schedule</p> <p>8 that contemplated hearing back from counsel,</p> <p>9 that, in your view, you've arrived at a</p> <p>10 resolution of -- of the issues, recognizing</p> <p>11 that that's the subject of approval and</p> <p>12 ratification and that sort of thing.</p> <p>13 Is that something you would be</p> <p>14 comfortable with? So, in other words, if we</p> <p>15 were to say in a scheduling order that we</p> <p>16 would be looking to hear from you by July 13</p> <p>17 or so in terms of whether counsel believed</p> <p>18 they resolved the issues, subject to</p> <p>19 follow-up approval, and then set the end of</p> <p>20 July as kind of a -- a second milestone, is</p> <p>21 that an arrange -- an approach that would --</p> <p>22 that would be consistent with your working</p>

10	12
1 relationship with the City?	1 -- we'll try to play a role in that regard.
2 MR. BLAKE: Yes, Your Honor. I	2 MR. CADITZ: Thank you, Your Honor
3 could certainly -- I could certainly do that.	3 MR. BLAKE: Thank you, Your Honor.
4 JUDGE FULTON: Okay. Okay, well,	4 JUDGE FULTON: Okay, very well
5 think we'll plan an order around that, so it	5 then. We'll go ahead and issue an order
6 sounds like the parties both believe that	6 probably later today that -- that addresses
7 this is likely to settle and that a lot of	7 the points that have been discussed here and
8 the material issues have been addressed	8 I appreciate, again, your time and your
9 already and but there's confidence that --	9 flexibility in getting together, and we'll
10 that there will be a resolution.	10 forward to hearing from you in a few weeks.
11 The remaining issues, and we'll --	11 MR. CADITZ: Thank you, Your Honor
12 we'll look to hear back from you by July 13	12 MR. BLAKE: Thank you, Your Honor.
13 in terms of whether the -- whether counsels	13 JUDGE FULTON: Any further
14 believe they resolved the remaining issues	14 questions?
15 with the recognition that it will take a	15 MR. CADITZ: No.
16 little time beyond that to get the necessary	16 JUDGE FULTON: Okay. Very well
17 approvals lined up with the City.	17 then. We'll adjourn. Thank you, Mr. Bryce.
18 Does that sound satisfactory?	18 THE REPORTER: Thank you.
19 MR. BLAKE: That's satisfactory to	19 MR. CADITZ: Thank you.
20 the City.	20 JUDGE FULTON: Bye now.
21 MR. CADITZ: Yes, Your Honor. To	21 (Whereupon, at 11:19 a.m., the
22 the Region, as well.	22 HEARING was adjourned.)

11	13
1 JUDGE FULTON: And I -- I take it	1 * * * * *
2 the issues that remain are of the nature that	2
3 it -- you don't need the services of a	3
4 third-party neutral or mediation process.	4
5 You all are pretty confident you can resolve	5
6 this between you?	6
7 MR. CADITZ: I think that's true,	7
8 Your Honor.	8
9 JUDGE FULTON: Okay. In the event	9
10 that things should prove to work differently	10
11 here and if you think there would be any	11
12 value in having mediation, I just want you to	12
13 know that we do have the capacity here on the	13
14 board to -- to conduct mediation. We have a	14
15 number of trained mediators, including	15
16 several of the judges, and that's a service	16
17 we can provide in the event that you need it.	17
18 We're not going to impose it on	18
19 you. At least not at this stage, but if --	19
20 if you do reach an impasse on your interim	20
21 measures and you think that would be	21
22 beneficial or helpful, let us know and we'll	22

4 (Pages 10 to 13)

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