



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

Office of Regional Counsel

Andrew S. Goldman (3RC10)
215-814-2487
Goldman.andrew@epa.gov

January 13, 2022

VIA EMAIL

Dan J. Jordanger, Esquire
Hunton Andrews Kurth LLP
Riverfront Plaza, East Tower
951 East Byrd Street
Richmond, VA 23219

**Re: Culpeper Settlement (CERCLA-03-2020-0055DC):
Dispute Regarding EPA Demand for Stipulated Penalties**

Dear Dan:

We received the Notice of Dispute, dated January 10, 2022 and received by EPA on that day, filed on behalf of Jefferson Homebuilders following its receipt, on January 6, 2022, of EPA's demand for payment of stipulated penalties. Pursuant to Paragraph 52 of the settlement, payment of the demanded penalties is stayed pending resolution of this dispute.

We have reviewed your arguments and our position is unchanged. Pursuant to Paragraph 51 of the settlement, the seven-day period for informal negotiations will expire on January 17 unless extended by EPA. We are willing to extend this period if, by January 17, you so request. In addition, we propose a virtual meeting to discuss our respective positions in an effort to resolve this matter. If you are interested in such a meeting, please identify your availability during the next two weeks.

I look forward to your response to this letter.

Respectfully,

ANDREW S. GOLDMAN
Sr. Assistant Regional Counsel

cc: Evelyn Sorto
Victoria Schantz
Regional Hearing Clerk