

EXHIBIT 65



Diamond Shamrock

June 20, 1984

Mr. Michael Catania
Director, Office of Regulatory Services
New Jersey Department of Environmental Protection
CN-402
John Fitch Plaza
Labor and Industry Building - 8th Floor
Trenton, New Jersey 08625

Reference: Administrative Consent Order 40-18
Modification of Site Evaluation Plan

Dear Mr. Catania:

On behalf of Diamond Shamrock Chemicals Company and in response to your comments on the site evaluation plan which we submitted April 19, and in accordance with paragraph 6 (b) of the above named order, we are submitting the attached modifications. These modifications have been made in direct response to both your "General Comments/Concerns" and "Specific Comments/Concerns", and the format is patterned to answer each of your comments specifically.

Overall, we disagree with your suggestion that a grid system would be more effective for the 80 Lister Avenue site than the biased sampling approach. We believe quantification of the dioxin levels and amounts of other chemicals on this site could best be accomplished by our original plan, but we have modified the plan to accommodate your comments.

Additionally, we have reviewed the Sampling Parameters requesting that selected samples be analyzed for TCDF and OCDD.

Diamond Shamrock Corporation
World Headquarters, 717 North Harwood Street, Dallas, Texas 75201 Phone: 214 922-2000

New Jersey Department of Environmental Protection
June 18, 1984
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Even though not required by the order, analysis of 10% of the near-surface samples borings and sediment samples have been included in the site evaluation plan modifications.

If you have any questions, please let me know.

Very truly yours,



William C. Hutton, PE
Corporate Manager
Environmental Affairs

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Attach.

cc: Mr. Ron Senna (12 copies)
Bureau Chief
New Jersey Department of Environmental Protection
Hazardous Site Mitigation Administration
8 Hanover Street
Trenton, New Jersey 08625