SCANNED

NEAL DRAWAS
KROLL ASSOCIATES, INC.
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facsimile transmittal

To:	Greg Root	Fax:	(508)792-7621
From:	Neal Drawas	Date:	02/21/02
Re:	ATF-Davidson RTN 2-00111	Pages:	9
CC:			

☐ Urgent x For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

In accordance with your request, attached is our initial comments to the Notice of Audit Findings and Notice of Non-compliance.

I would appreciate your contacting me as soon as possible to discuss this matter, and our request for a delay of the implementation schedule to allow time for the Department's review of the enclosed information and, if necessary., a meeting.

Please call me should you have any questions.

Neal Drawas

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RDMS Doc ID 107658

Kroll Associates

900 Third Avenue
New York, NY 10022-4751
Tel: (212) 593-1000
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February 20, 2002

Mr. Greg Root
Commonwealth of Massachusetts
Department of Environmental Protection
Central Regional Office
627 Main Street
Worcester, MA 01608

RE: CRWSC-Northbridge
ATF-Davidson
1 Main Street
RTN 2-00111

Dear Mr. Root:

We have reviewed the Notice of Audit Findings and the Notice of Noncompliance issued on January 23, 2002. In completing our review, it is apparent that certain key documents and information included in the various documents previously submitted to the Department were excluded from the Department's review. Pursuant to our telephone conversation of February 13, 2002, it is our desire to meet with the Department to review the historical studies and technical information we believe adequately addressed the deficiencies cited by the Department. In preparation for such a meeting, I am providing herein, specific reference to that information.

On behalf of Arcade Realty Trust, I am also requesting that the Department delay of the implementation schedules as specified in the Notice of Audit Findings and Notice of Noncompliance. This is necessary to allow the Department time to review this information and for all parties to meet to discuss the Audit Findings.

The following responses correspond to the cited non-compliance items specified in the Department's Notice of Noncompliance Summary (NON-CE-01-3103) dated January 23, 2002.

1. Failure to Meet Phase I Performance Standards, 310 CMR 40.0482

Submit

Illustrated site boundaries: The Phase I report included a Site Plan entitled "Monitoring Well Location Plan". This figure illustrated the property boundaries of the ATF-Davidson property, and monitoring wells. The Plan was taken from previous studies prepared by Caswell, Eichler and Hill that were on file with the

Department. We acknowledge that the figure did not specifically identify the area of impacted groundwater. A Phase I Addendum can be provided that specifically identifies the "Site".

Submit

Subsurface utilities: There are no subsurface utilities within the Site, i.e. the groundwater impact area. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no subsurface utilities exist within the Site.

OKAY

Legible denotations of monitoring wells- A site plan was included in the Phase I entitled (Monitoring Well Location Plan). A Monitoring Well Plan was also included as Figure 1 in the Caswell, Eichler & Hill, "Additional M-8 Investigations" Report, dated March 1987 and provided as Appendix 4 of the Phase I Report. A Site Plan showing the locations of the monitoring wells was included as Figure 3 of the Response Action Outcome Statement dated December 1988. We are also aware that Roy F. Weston, Inc. prepared a Property Site Map (Figure 4) that also identifies the locations of the monitoring wells. If necessary, a Phase I Addendum can be provided that clearly identifies the location of all monitoring wells.

ug/g NB-1-B-5 or ug/L? P.8 states may have come from ATF!

Sediment sampling locations- Caswell, Eichler & Hill conducted two sediment studies in July 1985 and December 1985. Appendix E of the Caswell, Eichler & Hill, "Additional Investigations" Report, dated January 1986 contained a sample location plan. This report was included as Appendix 2 of the Phase I Report.

NO Soil SAMPLING for chromium?

Submit

Floor and storm drain locations- There are no floor or storm drains within the Site, i.e. the groundwater impact area. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no floor or storm drains exist within the Site.

NO TE NOTIN SITE

OKAY

0483 (1)(b)(3)(e) (1)(c)(2)(a)

General areas of Oil and Hazardous Material (OHM) Release- Based on previous consultant reports; discussions with ATF-Davidson representatives; historical correspondence from DEQE; and our own site inspection, there were no identified areas of oil and hazardous material releases within the Site, or within the property. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no Oil and Hazardous Materials Release areas were known to exist.

MUST DISCUSS INABILITY TO GET H.M. DATA Tell him ITS OKAY

Historical hazardous materials usage- As stated in the Phase I Report the "Arcade" building was initially (1944) constructed by Whitin Machine Works as an equipment warehouse. Some time after 1966, ATF-Davidson used the building for the production of graphic arts equipment. The only processes known to occur were metal turning, milling, grinding, metal treatment, assembly, painting and testing. There was no indication from discussions with the ATF-Davidson representatives or documents on file with the Department that hazardous materials were used on-site. At the time the Phase I Report was prepared, ATF-Davidson had already vacated the property and there was no evidence of

historical hazardous materials usage. As stated in the report, the principal facilities for formerly manufacturing operations that utilized hazardous materials were located at the adjacent mill property. The Phase I report does cite the present of an electric transformer. It should be noted that the DEQE had been involved with ATF-Davidson since the early 1980's. This included the period when ATF-Davidson maintained operations at the Arcade property. It was our understanding that the only unresolved environmental matter in 1997 was groundwater contamination associated with RTN 2-0111.

new MEP req. All areas addressed

List of permits and environmental compliance history- There were no local, state or federal environmental permits, or oil and/or hazardous material storage permits issued for the Site or property. The Phase I did not specify this fact. There were no records of non-compliance notices, citations or Consent Agreements for the Site or property. The Phase I did not specify this fact. However, the Phase I specifically cited historical studies pertaining to the compliance history of ATF-Davidson in response to DEQE's specific requests. A Phase I Addendum can be provided that specifically states that no environmental permits or citations were issued against the Site or property.

OKAY Already stated

Estimation of the population within 0.5 miles of the Site- This information was provided in Section IVA of the Numerical Ranking System Scoresheet submitted to the Department on April 4, 1997. A Phase I Addendum can be provided that specifically states that the population within 0.5 miles of Site ranges from 100-999 individuals.

Submit w/source OK

Number of institutions within 500 feet of the Site- This information was provided in Section IVA of the Numerical Ranking System Scoresheet submitted to the Department on April 4, 1997. A Phase I Addendum can be provided that specifically states that there are no institutions within 500 feet of the Site.

Submit w/source OK

NRS Based on Phase I 310CMR 40.0520

Names and addresses of all Potentially Responsible Parties- The name and address of the Person Undertaking Response Action was listed on the BWSC-108 Form submitted with the Phase I Report. The only other known owners of the property were ATF-Davidson and White Consolidated, Inc. which was stated in the Phase I. It is our understanding that 310CMR40.043 does not require the addresses of all potentially responsible parties, but states that a list may (emphasis added) be provided in the Phase I.

Ownership search Submit yes it does 40.0483

Mumford River sediment studies- The Phase I report includes two studies by Caswell, Eichler & Hill pertaining to chromium in the Mumford River sediments. The studies were reported in October 1985 (Phase I-Appendix 1) and January 1986 (Phase I-Appendix 2). The Phase I report specifically reported that ATF-Davidson and White Consolidated, Inc. stated that chromium was never used at the Arcade facility, and chromium was not a constituent of concern based on the on-site sampling and analysis. The January 1986 Caswell, Eichler & Hill report clearly demonstrated that the highest concentrations of chromium were located in

No figure for B-1... IN App. 1 Higher figures IN App. 2 w/figure OK

He SAID ITS AN oversight

ANY Soil DATA

No soil samples

sediment samples upstream of the Arcade property. Analytical results of groundwater samples collected from the Arcade monitoring wells reported non-detectable levels (<0.005 mg/L) of chromium (Caswell, Eichler & Hill, October 1985; Phase I-Appendix 1).

Does NOT mean that no release occurred

Soil and groundwater analysis for heavy metals- Groundwater results for heavy metals were reported by Caswell, Eichler & Hill in their October 1985 Report. None of the reported laboratory results indicated an exceedence of GW-1 standards with the exception of barium. In January 1986, in response to the DEQE's request, Caswell, Eichler & Hill performed heavy metal analyses of arsenic, barium and zinc in soil. According to their findings, none of the results exceeded S-1 standards.

gw old data no soil data

No reason to sample other metals

Information in the file indicates that electroplating rinsewaters may have been disposed at the Site- The Department has indicated that this allegation is based on a June 19, 1991 DEP report that was not in the Department's files at the time of our investigation. That 1991 report alleged that the Arcade property was filled with constituents consisting of 90% spend foundry sand, 5% coal ash, 5% paint, plating sludge, plating rinsewaters, bromide salt baths, solvents and cutting oils. The information source that allowed the author to make that quantitative statement is unknown to us. We also question the validity of that statement having reviewed the historic reports submitted by the previous owner/operator and their consultants, and having interviewed key facility personnel regarding this specific matter. ATF-Davidson has always represented that no hazardous substances were deposited in the fill area. In May 1984, ATF-Davidson certified to the USEPA that prior to 1965 all of processing and waste waters were discharged into the Mumford River from the adjacent mill property. From 1965 until 1984 all wastewater was treated at the adjacent mill property. From 1984, ATF-Davidson discontinued the use of the on-site treatment system and shipped all wastes off-site. Based on historical documents, former owner testimony and on-site site assessment data there is no information to support the statement that electroplating rinsewaters were disposed at the Site.

So now what? Check 1984 handwritten notes

These are just statements

Laboratory Analytical Reports and Chain of Custody- The documents were inadvertently left out of the Phase I report. They are available and can be provided in a Phase I Addendum report.

Submit

Approximate Limit of Contamination- Page 7 of the Phase I Report specifically identifies the location of contamination. The Phase I report states, "Analysis of groundwater samples indicated that VOC contamination was present only in monitoring wells M-3, M-6 and M-8. Analysis of samples from the other wells did not reveal VOC constituents. Analysis of the groundwater samples for priority pollutant metals; barium and cyanide revealed levels well below the Massachusetts Drinking Water Standards for all metals except barium. Barium was identified at concentrations near or slightly above that standard in monitoring wells M-4, M-5, M-6 and M-8.

No, also in GP-6, SB-2, SB-5

5 of 8 are right at riverbank!

310CMR 40.0482: Performance Standards

A Phase I Report shall provide sufficient information to meet the requirements of the Numerical Ranking System and Tier Classification process described in 310CMR 40.0500 or where appropriate, support a Response Action Outcome Statement filed for a site prior to Tier Classification.

Submit okay *

As previous stated, the Phase I report included either in the text portion or Appendices sufficient information. If necessary, a Phase I Addendum can be prepared that would clearly state any information that the Department believes is necessary to support the NRS and Tier Classification submitted to the Department in March 1997.

Failure to Meet Response Action Outcome Performance Standards, 310CMR 40.1004

The MCP requires the use of Method 2 or 3 if contamination is present in significant concentrations in media other than soil or groundwater.

* See 3/87 investigation conclusions

M-9W was essentially clean in 1987 but had 52.9 ug/L PCE in 1997

PCE is higher in M-6 in 1997 than in 1986

Did not determine GW or soil category

Did not meet 40.0971(4)

This requirement does not pertain to this Site, as the chromium contamination found in the river sediments was not associated with the Arcade property activities. As previously stated, Caswell, Eichler & Hill demonstrated through their sampling and analysis of benthic samples and on-site groundwater monitoring, that chromium was present at greater concentrations upstream of the Site, and all groundwater samples from the on-site monitoring wells had non-detectable chromium concentrations. It was the conclusion of Caswell, Eichler & Hill, the DEQE and Kroll that the chromium present in the river sediments was not associated with the Arcade property. Therefore, the RAO Statement was in compliance with the Performance Standards.

No assessment of risk to safety per 0971(5)

No Exposure points were identified.

Mon. wells should have been identified *

The only exposure points for the known groundwater contamination were the individual monitoring wells. Therefore, the RAO Statement was in compliance with the Performance Standards. Q see "Additional M-8 investigations" 3/87 — it says contaminants flowing toward river.

No exposure point concentrations were calculated. → P. 10 identifies River as exp. point.

Why not? Submit

This requirement does not pertain to this Site for the VOC contamination in groundwater. Therefore, the RAO Statement was in compliance with the Performance Standards.

The extent of the release was not indicated per 310CMR 40.0904

It is not clear what the cited deficiency refers to. As previously noted only three monitoring wells were found to have VOC and barium concentrations in excess the applicable standards. All other wells within the Site were less than standard; therefore the extent of the release was inherently defined. Therefore, the RAO Statement was in compliance with the Performance Standards.

3 wells are scattered about the site + two are immediately adj. to River.

There was no characterization of the OHM per 310CMR40.0904(3)

It is not clear what the cited deficiency refers to. The only known materials deposited in the fill area were coal ash and foundry sands. Both of which may have been the source of barium. As stated in the Phase I report and historical studies, the presence of VOC appeared to be from an unknown but localized source. Therefore, the RAO Statement was in compliance with the Performance Standards.

self-explanatory okay

The Phase I recommends continued groundwater sampling for two to three years to ensure continued reduction of contaminant concentrations levels, however, no full round of groundwater samples were collected subsequently.

Groundwater samples were collected from all impacted wells in January 1997, May 1998, and August 1998. The purpose for recommending continuing groundwater monitoring was to support the fact that the VOC concentrations were decreasing over time due to natural attenuation. By continuing to monitor groundwater, we had sufficient data to support a Response Action Outcome Statement. Groundwater monitoring was only required until such time as the applicable standards were achieved. At that time, further monitoring was not required, and the RAO Statement was filed. Therefore, the RAO Statement was in compliance with the Performance Standards.

* only 6+8 were sampled 5/98

VCL continues to rise in every round in M-8

Failure to Meet Public Notice Requirements, 310CMR40.0485

No notice to Public officials regarding the availability of the Phase I and Tier Classification was found in files available to the Department

The Phase I Report, Tier Classification and Numerical Ranking System Scoresheet were submitted to the Department in March and April 1997. Included in the submittals were:

1- Notice of an Environmental Response Action giving notice of a Phase I Initial Site Investigation Report Availability with copies submitted to the Chief Municipal Officer and Board of Health of the Town of Northbridge.
2- Notice of an Initial Site Investigation and Tier II Classification with transmittal request for publication to the Milford Daily News, Classified Ad. Dept.

If necessary, we would be please to provide the Department addition copies of the required notices that were filed with the appropriate authorities and local newspaper for publication.

okay but next time send in cover letter to officials

okay, but next time, send in real copy of newspaper listing

Town clerk 234-2001

Clipping from the newspaper or invoice as verification within seven (7) days of publication per 310CMR40.1403(6)(b).

The cited regulation does not specify that a clipping from the newspaper or an invoice is required. 310CMR40.1403(6)(b) states:

At least three days prior to publication of the legal notice, a copy of the notice shall be sent to the Chief Municipal Officer and the Board of Health in the community (ies) in which the disposal site is located and in any other communities which are, or are likely to be, affect by the disposal site. If the Department does not publish the legal notice, then a copy of the legal notice which includes the date of publication and the name of the newspaper and a copy of the cover letter to the Chief Municipal Officer and Board of Health, shall be submitted to the Department within seven days of publication of the legal notice.

DIDNT DO THIS

As previously stated, a copy of the legal notice was sent to the Municipal Officer and Board of Health and was provided with the Phase I and Tier Classification. A copy of the legal notice was sent to the Milford Daily News was also provided to the Department. As we normally send a copy of the notice to the Municipal Officer and Board of Health without a cover letter, a cover letter was not provided with the various filings to the Department. WELL, THE MCP SAYS YOU MUST

Check CITATION

No copy of the notice to public officials regarding the availability of the RAO was found in the Department's files per 310CMR40.1403(f) and 40.1404(4).

A copy of the notice of the Response Action Outcome (RAO) Statement Availability to the Chief Municipal Officer and Board of Health was included as Appendix B of the RAO Statement filed with the Department.

Please note that we have not been able to locate the cited regulation 310CMR40.1403(f), and therefore can not respond to the allegation of non-compliance. 310CMR40.1404(4) does not apply to this Site as a Public Involvement Plan Site Designation does not apply to this Site.

1403(3)(F)! correct

Violation of 310cmr 40.0620(3)(a) and 40.0620(6) (Class II) Submittal of LSP evaluation Opinion and Tier Classification by Transition Deadline

The Transition Deadline for the site was August 2, 1995. A Tier Classification and an LSP Evaluation Opinion were submitted on March 12 and April 7, 1997, respectively.

Although the Department has indicated that this violation does not require further action, it is appropriate for us to ensure that accuracy of the facts of this citation. At the time that Arcade Realty Trust acquired the property it was their

IT'S STILL A VIOLATION

understanding that all matters related to RTN 2-0111 were completed by ATF-Davidson in accordance with the MCP and DEP's requirements. This was supported by the fact that all correspondence from the Department was directed to ATF-Davidson. It was not until January 1997 with the issuance of a notice to publish a list of Tier I Site, that Arcade Realty Trust became aware of the situation. Immediately upon receipt of the Notice, Arcade Realty Trust retained Kroll to prepare the required filings that were subsequently submitted in March and April 1997.

As you can see, we do not agree with all of the allegations of non-compliance, and do not agree with the Department's requirement that the RAO Statement be retracted. It is our recommendation that the appropriate course of action is for the Department to meet with us to review the cited deficiencies and the information already submitted to the Department.

As previously requested, until we have had an opportunity to meet with the Department to review all issues, we respectfully request that the deadlines of action to be taken be reasonably extended.

Upon review of this information, should you have any questions and wish to schedule a meeting, please feel free to call me (978) 443-1833.

Thank you for your attention to this matter and our request.
KROLL, INC.

Neal M. Drawas
Managing Director

cc. Mary Gardner
James Moody
Leonard Jolles

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-102A

Release Tracking Number
☐ - ☐

RELEASE LOG FORM ATTACHMENT

A. LOG/RELEASE LOCATION INFORMATION: (complete if using BWSC-102A and 102B or BWSC-102A only)

City/Town: _____ Date: _____ Time: _____ ☐ AM ☐ PM

Release Address: _____

Use of Attachment (check one): ☐ Amendment to Release Log Form ☐ Attachment Page(s): _____ of: _____

B. ORAL PLAN SUMMARY: (check all that apply)

☐ Removal of Contaminated Soils
- ☐ Re-use or Recycling
  - ☐ On Site ☐ Off Site Volume: _____ cubic yards
- ☐ Treat ☐ On Site ☐ Off Site Volume: _____ cubic yards
  - Describe: _____
- ☐ Store ☐ On Site ☐ Off Site Volume: _____ cubic yards
- ☐ Landfill ☐ Cover ☐ Disposal Volume: _____ cubic yards

☐ Removal of Drums,Tanks or Containers
- Describe: _____

☐ Removal of Other Contaminated Media
- Specify Type and Volume: _____

☐ Deployment of Absorbent or Containment Materials
☐ Temporary Covers or Caps
☐ Bioremediation
☐ Soil Vapor Extraction
☐ Structure Venting System
☐ Product or NAPL Recovery
☐ Groundwater Treatment Systems
☐ Air Sparging
☐ Temporary Water Supplies
☐ Temporary Evacuation or Relocation of Residents
☐ Fencing and Sign Posting

☐ Other Response Actions Describe: _____

☐ Check here if this Release or Threat of Release is a candidate for future presumptive approval of an IRA or RAM Written Plan.

Check one of the following: ☐ Oral IRA Plan Approval ☐ Oral RAM Plan Approval ☐ Oral IRA Plan Modification Approval

Other Comments: _____

C. ADDITIONAL INVOLVED PERSON INFORMATION:

Check One: ☐ PRP ☐ PRP Local Contact ☐ Other Person Performing Response Action

☐ Other Relationship Specify: _____

Name of Organization: _____

Name of Contact: _____ Title: _____

Street: _____ ☐ Check here if this person received a field NOR.

City/Town: _____ State: _____ ZIP Code: _____

Telephone: _____ Ext.: _____ FAX: _____

D. DEP ASSIGNMENT: (complete if using only BWSC-102A)

Preparer of RLFA (please print): _____ Signature: _____

Staff Lead Assigned (if different from preparer): _____

☐ Check here if the Release or Threat of Release is unassigned.

☐ Check here if this RLFA records a change in staff lead.

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-102B

RELEASE LOG FORM ATTACHMENT

Release Tracking Number
2 - 0111

E. LOG/RELEASE LOCATION INFORMATION: (complete if using BWSC-102B only)

City/Town: Northbridge Date: 12/14/01 Time: 8:00 ☒ AM ☐ PM

Release Address: 1 Main ST.

Use of Attachment (check one): ☐ Amendment to Release Log Form ☒ Attachment Page(s): 1 of: 1

F. INSPECTIONS OR SITE VISITS (also Follow-up Office Response): (check one)

☐ Initial Compliance Field Response - Announced ☐ Initial Compliance Field Response - Unannounced
☒ Compliance Field Response - Announced ☐ Compliance Field Response - Unannounced ☐ Short Notice Audit Inspection
☐ Field Response - Direct Oversight ☐ Follow-up or Other Field Response ☐ Follow-up Office Response

G. ADDITIONAL DESCRIPTION:

Audit Site Inspection. I met Neal Drawas (LSP) on-site to review site conditions. We observed the locations of monitoring wells, surficial soil conditions, and riverbank conditions.

Site is mainly coal ash fill. cinders + ash covers almost the whole site. Growth is sparse but not stressed

Photos collected - see file memo

H. DEP ASSIGNMENT: (complete if using BWSC-102A and 102B or BWSC-102B only)

Preparer of RLFA (please print): Greg Root Signature: Greg Root

Staff Lead Assigned (if different from preparer):

☒ Check here if the Release or Threat of Release is unassigned.

☐ Check here if this RLFA records a change in staff lead.

KROLL ASSOCIATES, INC.

2 PENN PLAZA EAST, NEWARK, NJ 07105

TELEPHONE: (973) 589-7666 FAX: (973) 522-1338

1998

July 6, 1998

Massachusetts Department of Environmental Protection
Central Regional Office
627 Main Street
Worcester, MA 01608

RE: ATF-Davidson Property
355 Main Street, (Whitinsville) Northbridge, MA
RTN 2-0111

Dear Sir/Madam:

This status report is being provided by Kroll Associates, Inc. on behalf of Arcade Realty Trust, the current owner of the subject property. A Phase I Initial Site Investigation Report, Licensed Site Professional Evaluation Opinion and a Tier II Classification Numerical ranking Scoresheet were submitted to the MADEP in March 1997. It appeared that natural attenuation would reduce residual chlorinated constituent concentrations to within MCP Method 1 Cleanup Standards in a relatively short time period.

As described in the Phase I Report, annual groundwater sampling and analysis is being conducted to monitor conditions at the Site. Groundwater samples were collected on May 28, 1998. Vinyl Chloride (VCL), that exceed the MCP Method 1 GW2/GW3 Cleanup Standard in two monitoring wells on October 17, 1996, was the only contaminant of concern for this sampling period. The two monitoring wells that were re-sampled, as result of historical exceedances, were M-6 and M-8. For convenience a summary table with previous laboratory results and a Site Plan showing monitoring well locations are enclosed.

The results of the VOC analysis by EPA Method 8260 are tabulated below, with

	M-6		M-8		GW2/3
Compound	10/96	05/98	10/96	05/98	Standard
Tetrachloroethene (PCE)	93.3	5	ND	ND	3,000
Trichloroethene (TCE)	31.4	ND	5.1	2	300
1,2-Dichloroethene (DCE)	28.2	ND	82.1	64	20,000
Vinyl Chloride (VCL)	**17.8**	ND	**62.5**	**72**	2
Methyl-t-butyl ether (MTBE)	ND	1	ND	ND	50,000

the more restrictive of the GW-2 or GW-3 Cleanup Standards and the October 17, 1996 results also show for comparison.

As indicated above, VCL has dropped to a non-detectable level in M-6, but the concentration has risen slightly in M-8. VCL in M-8 is now the only constituent exceeding the GW-2 Cleanup Standard of 2 ug/L. the GW-2 Groundwater Category has been chosen as being the most appropriate due to the proximity of some of the monitoring wells to the building on site. The MCP characterizes groundwater as GW-3 if it is located beyond 30 feet of an occupied building or structure [310 CMR 40.0932(6)]. Therefore, groundwater in the area of M-8 may be assessed using only the GW-3 Standard of 500 ug/L for VCL due to its location (see attached Site Plan). The M-8 result of 72 ug/L readily meets this limit.

Although it is not clear why the major constituent reduction seen in M-6 has not also occurred in M-8, it is possible that the construction of a building addition immediately upgradient of M-6 has helped to mitigate that source. A passive venting that was installed under the slab to eliminate potential vapor migration into the building and the elimination of stormwater percolation all may have contributed to the contaminant reduction in groundwater.

Our understanding of the biodegradation of PCE and TCE is that high levels of DCE and VCL are positive indicators of bacterial activity. It is anticipated that natural bioremedial action will ultimately be completely adequate in degrading these compounds.

Due to the encouraging results presented here, a subsequent sampling round will be conducted in August 1998. Pending the analytical results, it is anticipated that a Class B-1 Response Action Outcome Statement will be submitted for the release, demonstrating that a permanent solution has been achieved with a level of No Significant Risk to health, safety, public welfare and the environment.

Please contact this office if you have any questions regarding these finding or need further information.

Very truly yours,
KROLL ASSOCIATES, INC.

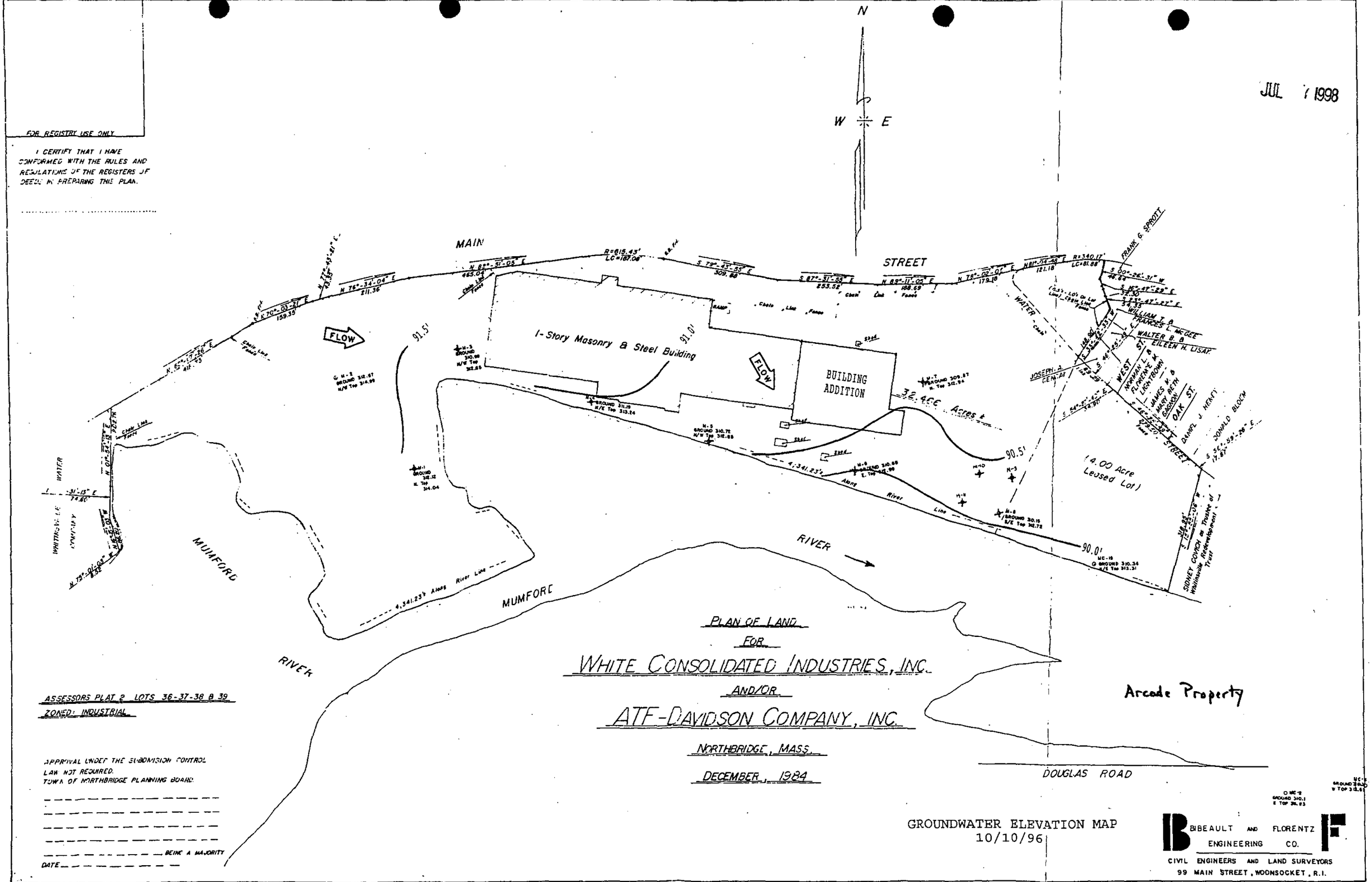
Neal M. Drawas, LSP

Encl.

JUL 7 1998

FOR REGISTRY USE ONLY

I CERTIFY THAT I HAVE CONFORMED WITH THE RULES AND REGULATIONS OF THE REGISTERS OF DEEDS IN PREPARING THIS PLAN.



2-0000111-
ATF Davidson
1 Main Street
Northbridge

Commonwealth of Massachusetts
Executive Office of Environmental Affairs

Department of Environmental Protection

William F. Weld
Governor
Trudy Coxe
Secretary, EOEA
David B. Struhs
Commissioner

June 30, 1995

RE: Deadline For an Evaluation of a Non-priority Disposal Site.

Dear Sir or Madam:

Our information indicates that you may have a connection to the above referenced location as a landowner, facility owner or operator, generator or transporter of oil or hazardous material, or another type of connection to oil or hazardous material released at such location. The Department of Environmental Protection (DEP) listed the location identified above as a **Non-priority Disposal Site** at which releases of oil and/or hazardous material occurred prior to January 1989. The Massachusetts Contingency Plan (310 CMR 40.0000, the "MCP") and Chapter 21E (the "State Superfund") of the Massachusetts General Laws contain specific requirements that must be met by those legally responsible for Non-priority Disposal Sites.

In summary, the MCP requires this site to be evaluated to determine whether a reportable release of oil and/or hazardous material has occurred and whether further response actions are required[1]. If you take appropriate action before August 2, 1995, you can minimize your cleanup costs, maintain compliance with the MCP, and avoid possible DEP enforcement action.

PLEASE BE ADVISED that, if you have not already done so, you must submit a Licensed Site Professional (LSP) Evaluation Opinion by August 2, 1995, that provides a determination that either:

1) there has not been a reportable release and no response actions are necessary; OR
2) a reportable release has occurred but previous response actions were sufficient to satisfy the cleanup requirements of the new MCP and no further response actions are necessary; OR
3) a reportable release has occurred and additional response actions are necessary. (If additional actions are necessary due to groundwater contamination in an aquifer

[1] The specific requirements that must be met for Non-priority Disposal Sites can be found in the MCP at 310 CMR 40.0636.

One Winter Street • Boston, Massachusetts 02108 • FAX (617) 556-1049 • Telephone (617) 292-5500

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that can potentially be used for drinking water, you may apply for a one year extension of the August 2, 1995 deadline. See Attachment A for further information). PPA definition change

If you previously filed a report with DEP which specifically recommended that no further actions are necessary at this site, you may submit a certified statement that affirms that recommendation in lieu of submitting an LSP Evaluation Opinion.

If you file an LSP Evaluation Opinion or affirm a no further action recommendation by August 2, 1995, DEP will not assess an Annual Compliance Fee for the first year. **If you fail to do so, the site will be categorically classified as a Tier IB Disposal Site and you will be assessed a Tier IB Annual Compliance Fee of $2,600 per year until you reclassify[2] the site or submit a RAO to the Department.**

If you believe filing an LSP Evaluation Opinion is beyond your financial, legal or technical ability you must notify DEP of your inability to file by following the procedures of 310 CMR 40.0172.

Licensed Site Professional (LSP):

You must employ a Licensed Site Professional (LSP) to file an LSP Evaluation Opinion. LSPs are professionals licensed by the Commonwealth of Massachusetts to issue Waste Site Cleanup Activity Opinions in connection with response actions at sites. For a list of LSP names, please contact the Board of Registration at (617) 556-1145.

You and your Licensed Site Professional (LSP) may obtain copies of all DEP forms and applications by contacting your DEP regional service center.

If you believe you never had or no longer have a connection to this site which makes you responsible for cleanup, please send a written explanation to my attention along with any information you have regarding those currently connected with this site. If you have other questions, please call the MCP Hotline at (617) 338-2255 from the 617 area code and outside Massachusetts or to (800) 462-0444 from the 413 and 508 area codes.

Very truly yours,

Stephen P. Winslow
Bureau of Waste Site Cleanup

---

[2] As an alternative to tier classification, persons who own property to which groundwater contamination has migrated may be able to file for Downgradient Property Status as described in 310 CMR 40.0180).

GR

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central Regional Office, 627 Main Street, Worcester, MA 01608

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

ELLEN ROY HERZFELDER
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

The Shop at Whitinsville
One Main Street
Whitinsville, MA 01588

Re: CRWSC - Northbridge
Covitch Property
One Main Street
RTN 2-0000112

Attention: Leonard Jolles
Property Manager

Notice of Response Action
Deadline Extension Approval
310 CMR 40.0000
M.G.L. c. 21E

Dear Mr. Jolles:

The Department has reviewed and approves the Request for Additional Schedule Extension, dated June 7, 2004, and submitted on your behalf by Alistair McDonald, LSP, of Golder Associates, Inc. The Department approves the deadline extension to **August 19, 2004**, for complying with the requirements of the Notice of Response Action (NORA), dated February 6, 2004.

If you have any questions regarding this deadline extension approval, please contact me at (508) 767-2803.

Sincerely,

Mark E. Baldi
Acting Section Chief
Audits/Site Management
Bureau of Waste Site Cleanup

Date: June 14, 2004

cc: Alistair R.T. MacDonald, LSP, Golder Associates, 540 North Commercial St., Manchester, NH 03101-1146
James Moody, Enforcement Tracking, BWSC, DEP-CERO
Greg Root, Audits, BWSC, DEP-CERO
Maria Pinaud, Office of Enforcement, DEP-Boston
Gregg Hunt, BWSC, DEP-Boston
File: Data Entry [C&E/DMDOAP]

This information is available in alternate format. Call Donald M. Gomes,, ADA Coordinator at 617-556-1057.

http://www.mass.gov/dep • Phone (508) 792-7650 • Fax (508) 792-7621 • TDD # (508) 767-2788
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THE SHOP AT WHITINSVILLE

Street, Apt. No.; or PO Box No.
ONE MAIN STREET

City, State, ZIP+4
WHITINSVILLE, MA 01588

FILE

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central Regional Office, 627 Main Street, Worcester, MA 01608

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

ELLEN ROY HERZFELDER
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

URGENT LEGAL MATTER: PROMPT ACTION NECESSARY

February 6, 2004

The Shop at Whitinsville
One Main Street
Whitinsville, MA 01588

RE: Northbridge- BWSC
Shop Portion of Covitch Property
RTN # 2-0000112
NOTICE OF RESPONSE ACTION
M.G.L. c.21E & 310 CMR 40.0000

Because of a failure to act by those parties potentially responsible for contamination at the above location, the Department of Environmental Protection is planning to hire its own contractor(s) to begin performing needed work at this site. If such actions occur, the Department will seek to recover 3 times its costs against those parties considered legally liable for contamination at this site, and will do so by placing a lien on all properties in the Commonwealth owned by such parties. Actions must be taken NOW to prevent the Department from proceeding in this regard.

Dear Mr. Jolles:

The Department of Environmental Protection, Bureau of Waste Site Cleanup (the "Department" or "DEP") has determined that there have been one or more releases of oil and/or hazardous material at the above-referenced site. The investigation and cleanup of such releases is governed by M.G.L. c. 21E, the Massachusetts Oil and Hazardous Materials Release Prevention and Response Action, and the regulations adopted thereunder, known as the Massachusetts Contingency Plan (the "MCP"; 310 CMR 40.0000).

On April 30, 1985 you (as used in this Notice "you" refers to The Shop at Whitinsville), notified the Department of releases of oil and hazardous materials associated with historical manufacturing site uses that resulted in impacts to soil, groundwater and a surface water threat. Release Tracking Number ("RTN") RTN # 2-0000112 was assigned and on April 30, 1985, a

Notice of Responsibility ("NOR") was issued to you. In addition, a Notice of Audit Finding/Notice of Noncompliance was issued on April 29, 2002; an Audit Follow-up Plan Conditional Approval requiring specific actions was issued on October 24, 2002. The NON informed you that you are not in compliance with M.G.L. c. 21E and the MCP because you failed to conduct certain Response Actions at the site in accordance with regulatory deadlines. As of the date of this letter, you have failed to comply with all of the Audit Follow-up Plan Conditional Approval conditions required at the site needed to address this release. As a result, if you are a legally liable party, you continue to be in noncompliance with M.G.L. c. 21E and the MCP and you are now subject to Civil Administrative Penalties under M.G.L. c. 21A, Section 16 and 310 CMR 5.00, the Civil Administrative Penalty Regulations.

This Notice provides you a final opportunity to take the Response Actions required to address this site before the Department does so. Unless you promptly reply to this Notice and comply with its requirements, the Department will prepare to take the actions described below on or after ***March 5, 2004***. Massachusetts General Law Chapter 21E, Section 4 authorizes the Department to take such Response Actions and, when time allows, requires the Department to notify you of its intent to take such actions.

RESPONSE ACTIONS REQUIRED AT THIS SITE

To comply with the requirements of M.G.L. c.21E and the MCP, as specified in the Notice of Responsibility(ies) issued in this matter, all necessary actions must be taken to eliminate substantial hazards presented by the site and achieve a level of No Significant Risk [310 CMR 40.1000]. These actions may include, but are not limited to, Comprehensive Response Actions [310 CMR 40.0800] and/or any necessary Immediate Response Actions [310 CMR 40.0400].

COMPLIANCE DEADLINE FOR NOTIFICATION OF YOUR INTENT TO CONDUCT RESPONSE ACTIONS

To perform Response Actions in lieu of the Department, you must respond to this Notice by *February 27, 2004* and provide the Department with the following:

1. A signed agreement with a Licensed Site Professional (LSP) to conduct Response Actions as required by M.G.L. c.21E and the MCP. You may obtain a list of the names and addresses of these LSPs from the Board of Registration of Hazardous Waste Site Cleanup Professionals at (617) 556-1145 or online at http://www.lspa.org;

2. A strict timetable for conducting such Response Actions;

RESPONSE ACTIONS THE DEPARTMENT INTENDS TO TAKE IF YOU FAIL TO ACT

If you do not provide the commitment to conduct Response Actions as specified above, as an initial step in the site characterization process, the Department will secure the services of one or more of its contractors to conduct the following actions at this site:

1. Review of all pertinent records including the state, local, federal and historical records which are available for information relative to the use, storage, disposal and discharge of metal plating wastes at the site.

2. Collect at least five (5) sediment samples, two (2) of which will be located downstream of the plant, to be laboratory analyzed for 13 Priority Pollutant Metals.

3. Review the Phase II Comprehensive Site Assessment and Response Action Outcome Statement, submitted in accordance with the Audit Follow-up Plan, to determine if adequate sampling was conducted downgradient of the raceway to define the extent of contamination as per the Audit Follow-up Plan Conditional Approval. Additional soil and groundwater sampling may be conducted if warranted.

Information obtained from the above initial site investigation activities will help determine the scope, nature, and timing of additional actions. The Department reserves the right to conduct the additional response actions necessary to achieve a level of No Significant Risk at the site without providing additional notice to you.

POTENTIAL LIABILITY AND TREBLE DAMAGES

Please be advised that the Department continues to considers you potentially liable under M.G.L. c.21E for up to three (3) times the Department's Response Action Costs incurred by the Department and for damages from the impairment of the Commonwealth's natural resources. This liability was described in the Notice of Responsibility previously issued to you. In addition to liability for the Department's Response Action Costs, any person who violates any provision of M.G.L. c. 21E or 310 CMR 40.0000 shall be subject to a civil penalty not to exceed $25,000 for each day of violation or by a fine of not more than $25,000 or by imprisonment for not more than two years for each such violation.

To secure payment of Response Action Costs, the Commonwealth has the authority under M.G.L. c. 21E, §13 to effect liens on site and non-site property that you own in the Commonwealth. The Commonwealth may foreclose on any such lien, and the Attorney General may bring other legal action against you to recover any debt owed the Commonwealth.

If you wish to claim that you are financially unable to conduct the required Response Actions at this time, you must submit a notice of financial, technical or legal inability as described in 310 CMR 40.0172 to secure yourself with a defense to treble damages. If you can demonstrate that you do not have the financial resources available to continue the cleanup at your property, the Department can grant Financial Inability (FI) status, which must be renewed annually. In order to be granted FI status by the Department, you must complete and submit a FI application to DEP on or before **February 27, 2004.** Your application must include submittal of your three most recent Federal Income Tax returns, along with two cost estimates prepared by LSPs for the next required action to clean up your site. For more information regarding the financial inability application, please contact Wanda Kopcych at (617) 348-4055. Even if you have a defense to treble damages, you will still be obligated to complete response actions that you are able to perform and continue to be liable for costs and damages.

Should DEP initiate Response Actions at this site, DEP reserves the right to exercise the full extent of its legal authority to obtain full compliance with all applicable requirements, including but not limited to, criminal prosecution, civil action including court-imposed civil penalties, and administrative penalties issued by DEP. If you have any questions relative to this Notice, please contact **James Moody** at the letterhead address or by telephone at **508-767-2703**. All future communications regarding this release should reference the following Release Tracking Number: RTN # 0000112.

Sincerely,

Mark E. Baldi
Acting Section Chief
Audits/Site Management
Bureau of Waste Site Cleanup

CERTIFIED MAIL # 7000 1670 0002 8600 5170

cc:
Mary Gardner, Deputy Regional Director, BWSC, DEP-CERO
Michael Maher, Regional Enforcement Coordinator, DEP-CERO
Northbridge Board of Health
DEP-BOSTON
Attn: Janine Commerford, BWSC Division Director of Technical and Financial Support
Maria Pinaud, Compliance and Enforcement Chief
Data Entry- [C&E/NORA]

Massachusetts Department of Environmental Protection **BWSC-104**
Bureau of Waste Site Cleanup

mjm 11/5/02: AVD Adm

RESPONSE ACTION OUTCOME (RAO) STATEMENT & DOWNGRADIENT PROPERTY STATUS TRANSMITTAL FORM
Pursuant to 310 CMR 40.0180 (Subpart B), 40.0580 (Subpart E) & 40.1056 (Subpart J)

Release Tracking Number: 2 - 0111

RECEIVED
OCT 31 2002
DEP - CERO

A. SITE OR DOWNGRADIENT PROPERTY LOCATION:

Site Name: (optional) ATF Davidson

Street: ~~1 Main Street~~ 355 Main Street Location Aid: opposite [illegible]

City/Town: Whitinsville (Northbridge) ZIP Code: 01588

☑ Check here if this Site location is Tier Classified. If a Tier I Permit has been issued, state the Permit Number:

Related Release Tracking Numbers that this Form Addresses: 2-11846

If submitting an RAO Statement, you must document the location of the Site or the location and boundaries of the Disposal Site subject to this Statement. If submitting an RAO Statement for a PORTION of a Disposal Site, you must document the location and boundaries for both the portion subject to this submittal and, to the extent defined, the entire Disposal Site. If submitting a Downgradient Property Status Submittal, you must provide a site plan of the property subject to the submittal and, to the extent defined, the Disposal Site.

B. THIS FORM IS BEING USED TO: (check all that apply)

☑ Submit a **Response Action Outcome (RAO) Statement** (complete Sections A, B, C, D, E, F, H, I, J and L).

☑ Check here if this is a revised RAO Statement. Date of Prior Submittal: 12/18/98

☐ Check here if any Response Actions remain to be taken to address conditions associated with any of the Releases whose Release Tracking Numbers are listed above. This RAO Statement will record only an RAO-Partial Statement for those Release Tracking Numbers.

Specify Affected Release Tracking Numbers:

☐ Submit an optional **Phase I Completion Statement supporting an RAO Statement or Downgradient Property Status Submittal** (complete Sections A, B, H, I, J, and L).

☐ Submit a **Downgradient Property Status Submittal** (complete Sections A, B, G, H, I, J and K).

☐ Check here if this is a revised Downgradient Property Status Submittal. Date of Prior Submittal:

☐ Submit a **Termination of a Downgradient Property Status Submittal** (complete Sections A, B, I, J and L).

☐ Submit a **Periodic Review Opinion** evaluating the status of a **Temporary Solution** (complete Sections A, B, H, I, J and L).

Specify one: ☐ For a Class C RAO ☐ For a Waiver Completion Statement Indicating a Temporary Solution

Provide Submittal Date of RAO Statement or Waiver Completion Statement:

You must attach all supporting documentation required for each use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.

C. DESCRIPTION OF RESPONSE ACTIONS: (check all that apply)

☑ Assessment and/or Monitoring Only

☐ Removal of Contaminated Soils

☐ Re-use, Recycling or Treatment

○ On Site ○ Off Site Est. Vol.: _____ cubic yards

Describe:

☐ Landfill ○ Cover ○ Disposal Est. Vol.: _____ cubic yards

☐ Removal of Drums, Tanks or Containers

Describe:

☐ Removal of Other Contaminated Media

Specify Type and Volume:

☐ Other Response Actions

Describe:

☐ Deployment of Absorbent or Containment Materials

☐ Temporary Covers or Caps

☐ Bioremediation

☐ Soil Vapor Extraction

☐ Structure Venting System

☐ Product or NAPL Recovery

☐ Groundwater Treatment Systems

☐ Air Sparging

☐ Temporary Water Supplies

☐ Temporary Evacuation or Relocation of Residents

☐ Fencing and Sign Posting

SECTION C IS CONTINUED ON THE NEXT PAGE.

Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup

BWSC-111

rym: 11/5/02: Adm: Avd

AUDIT FOLLOW-UP PLAN TRANSMITTAL FORM & POST- AUDIT COMPLETION STATEMENT

Pursuant to 310 CMR 40.1160 - 40.1170 (Subpart K)

Release Tracking Number: 2 - 111

A. SITE LOCATION:

Site Name: (optional) ATF Davidson

Street: ~~1 Main Street~~ 355 Main Street Location Aid: opposite Whitin Pond

City/Town: Whitinsville (Northbridge) ZIP Code:

Tier Classification Status: (check one) ☐ Not Tier Classified ☑ Tier 2 ☐ Tier 1 Permit Transmittal Number:

Related Release Tracking Numbers that this form addresses: 2-11846

B. THIS FORM IS BEING USED TO: (check one)

☐ Submit an **Audit Follow-Up Plan** (complete Sections A, B, D, E and F).

☐ Submit a **Modified or Revised Audit Follow-Up Plan** (complete Sections A, B, D, E and F).

☑ Submit a **Post-Audit Completion Statement** (complete Sections A, B, C, D, E, and F).

You must attach all supporting documentation for the use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.

C. POST-AUDIT RESPONSE ACTIONS SUMMARY:

Notice of Audit Finding: Date Issued: 01/23/2002

Check all that apply:

☑ Documentation (Check all that apply):

- ☑ Provided Technical Justification, or Supporting or Clarifying Information Relating to Previous Response Actions
- ☐ Performed Additional Risk Assessment
- ☐ Modified Disposal Site Boundary

☐ Field Work (Check all that apply):

- ☐ Sampled Previously Assessed Media (Check all that apply):
  - ☐ Soil ☐ GW ☐ SW ☐ Sediment ☐ Air ☐ Waste Material
- ☐ Sampled New Media Not Previously Assessed (Check all that apply):
  - ☐ Soil ☐ GW ☐ SW ☐ Sediment ☐ Air ☐ Waste Material
- ☐ Performed Remediation (Describe):

☐ Outcome (Check all that apply and submit appropriate transmittal form(s)):

- ☐ Implemented or Amended Activity and Use Limitation
- ☐ Modified Risk Assessment Method
- ☐ Revised Response Action Outcome (RAO) Class
- ☐ Revised Tier Classification
- ☐ Revised or Modified Phase Work
- ☐ Retracted RAO Statement
- ☐ Other:

nm: file 11/19/02

Kroll Associates

900 Third Avenue
New York, NY 10022-4751

Tel: (212) 593-1000
Fax: (212) 593-2631

November 12, 2002

MADEP
Div. Waste Site Cleanup
Central Regional Office
627 Main Street
Worcester, MA 01609

RE: Former ATF-Davidson Arcade
Main Street
Northbridge, MA
RTN# 2-0111

Gentlemen/Ladies:

Enclosed please find Certified Mail Receipts from the Northbridge (Whitinsville) Selectmen's Office and Board of Health verifying their receipt of the Notice of an Environmental Response Action issued by Corey Management Company, Inc. (see Attachment).

Very truly yours,

Neal M. Drawas

RECEIVED
NOV 18 2002

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

BOARD OF HEALTH
TOWN HALL
MEMORIAL SQUARE
WHITINSVILLE, MA 01588

2. Article Number
(Transfer from service label) 7002 0

PS Form 3811, August 2001 Domestic Re

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Clerk: KDGXB1
11/04/02

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Street, Apt. No.; or PO Box No. TOWN HALL
City, State, ZIP+4 MEMORIAL SQUARE
WHITINSVILLE, MA 01588

PS Form 3800, April 2002 See Reverse for Instructions

7002 2660 0000 0980 2002

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

SELECTMENS OFFICE
TOWN HALL
MEMORIAL SQUARE
WHITINSVILLE, MA

COMPLETE THIS SECTION ON DELIVERY

A. Signature
X Constance Hills ☐ Agent ☐ Addressee

B. Received by *(Printed Name)* Constance Hills
C. Date of Delivery 11/5/02

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number
(Transfer from ser 7002 0860 0008 4092 1634

PS Form 3811, August 2001 Domestic Return Receipt 102595-02-M-1540

RECEIVED
NOV 18 2002

[Legal Notice]

NOTICE OF AN ENVIRONMENTAL RESPONSE ACTION

ATF Davidson
1 Main Street, Northbridge, MA 01588
RTN 2-0111

Pursuant to the Massachusetts Contingency Plan [310 CMR 40.1403(3)] adopted by the Department of Environmental Protection, notice is hereby given that the item(s) checked below applies to this site:

( ) Implementation of Phase IV Remedial Actions
( ) Use of Respirators & Protective Clothing
( ) Sampling of Private Drinking Water Wells/ Indoor Air/ or Surficial Soils at Residential Property
( ) Immediate Response Action (IRA) involving Imminent Hazard
( ) IRA Completion Statement Availability for above IRAs
( ) Release Abatement Measure (RAM) Implementation
( ) Phase I Initial Site Investigation Report Availability
( ) Subsequent Phase Report Availability
(X) Response Action Outcome (RAO) Statement Availability
( ) Downgradient Property Status (DPS) Submittal Availability.

PROJECT SUMMARY (Purpose, Nature, Expected Duration, etc.)

Elevated levels of chlorinated solvents and barium were identified in groundwater at the subject site in 1985. Subsequent assessment and monitoring activities indicated that contaminant concentrations had been reduced by natural attenuation to levels within the applicable Method 1 Cleanup Standards established by the DEP.

A Class B-1 Response Action Outcome (RAO) Statement was submitted to DEP in December 1998 demonstrating that a Permanent Solution had been achieved with a level of No Significant Risk of harm to health, safety, public welfare and the environment. Following a DEP Audit, a RAO Statement Addendum was prepared and submitted to DEP which provided additional documentation in support of the RAO.

Any person interested in obtaining additional information or purchasing a copy of the document(s) (where applicable) may contact Corey Management Company, Inc. (781-275-2970) or the Central Regional Office of the Mass. Dept. of Environmental Protection (508-792-7650).

cc: Chief Municipal Officer
Board of Health

[Legal Notice]

MAB 3/6/02
RTENF
3-6-02

Kroll Associates

900 Third Avenue
New York, NY 10022-4751

Tel: (212) 593-1000
Fax: (212) 593-2631

MAR - 5

February 27, 2002

Mr. James Moody
Enforcement Coordinator
MADEP
Central Regional Office
627 Main Street
Worcester, MA 01608

RE: ATF-Davidson, 1 Main Street, Northbridge, MA
RTN 2-00111

Dear Mr. Moody:

Pursuant to our telephone conversations of February 27, 2002, it is my understanding that deadlines for action to be taken as specified in the Notice of Noncompliance Summary (NON-CE-01-3103) and Notice of Audit Findings will be indefinitely extended.

On February 20, 2002 Kroll provided the Department a response to the Notice of Noncompliance and Notice of Audit Findings. In that correspondence Kroll set out specific references to information that the Department had not taken into account during its Audit. Kroll also requested a meeting with the Department to allow all parties the opportunity to discuss the historic studies and Audit. At this time we have not received a response from the Department.

As you stated, the Department will extend the compliance dates, pending the requested meeting.

Should this not actually reflect you understanding, please contact me as soon as possible.

Thank you for your response and assistance with this matter.
KROLL INC.

Neal M. Drawas
Managing Director

cc. L. Jolles, Arcade Realty Trust

RT ENF

Kroll Associates

900 Third Avenue
New York, NY 10022-4751

Tel: (212) 593-1000
Fax: (212) 593-2631

February 20, 2002

Mr. Greg Root
Commonwealth of Massachusetts
Department of Environmental Protection
Central Regional Office
627 Main Street
Worcester, MA 01608

FEB 25 2002

DEP
CE

RE: CRWSC-Northbridge
ATF-Davidson
1 Main Street
RTN 2-00111

Dear Mr. Root:

We have reviewed the Notice of Audit Findings and the Notice of Noncompliance issued on January 23, 2002. In completing our review, it is apparent that certain key documents and information included in the various documents previously submitted to the Department were excluded from the Department's review. Pursuant to our telephone conversation of February 13, 2002, it is our desire to meet with the Department to review the historical studies and technical information we believe adequately addressed the deficiencies cited by the Department. In preparation for such a meeting, I am providing herein, specific reference to that information.

On behalf of Arcade Realty Trust, I am also requesting that the Department delay of the implementation schedules as specified in the Notice of Audit Findings and Notice of Noncompliance. This is necessary to allow the Department time to review this information and for all parties to meet to discuss the Audit Findings.

The following responses correspond to the cited non-compliance items specified in the Department's Notice of Noncompliance Summary (NON-CE-01-3103) dated January 23, 2002.

1. Failure to Meet Phase I Performance Standards, 310 CMR 40.0482

Illustrated site boundaries: The Phase I report included a Site Plan entitled "Monitoring Well Location Plan". This figure illustrated the property boundaries of the ATF-Davidson property, and monitoring wells. The Plan was taken from previous studies prepared by Caswell, Eichler and Hill that were on file with the

Department. We acknowledge that the figure did not specifically identify the area of impacted groundwater. A Phase I Addendum can be provided that specifically identifies the "Site".

Subsurface utilities: There are no subsurface utilities within the Site, i.e. the groundwater impact area. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no subsurface utilities exist within the Site.

Legible denotations of monitoring wells- A site plan was included in the Phase I entitled (Monitoring Well Location Plan). A Monitoring Well Plan was also included as Figure 1 in the Caswell, Eichler & Hill, "Additional M-8 Investigations" Report, dated March 1987 and provided as Appendix 4 of the Phase I Report. A Site Plan showing the locations of the monitoring wells was included as Figure 3 of the Response Action Outcome Statement dated December 1988. We are also aware that Roy F. Weston, Inc. prepared a Property Site Map (Figure 4) that also identifies the locations of the monitoring wells. If necessary, a Phase I Addendum can be provided that clearly identifies the location of all monitoring wells.

Sediment sampling locations- Caswell, Eichler & Hill conducted two sediment studies in July 1985 and December 1985. Appendix E of the Caswell, Eichler & Hill, "Additional Investigations" Report, dated January 1986 contained a sample location plan. This report was included as Appendix 2 of the Phase I Report.

Floor and storm drain locations- There are no floor or storm drains within the Site, i.e. the groundwater impact area. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no floor or storm drains exist within the Site.

General areas of Oil and Hazardous Material (OHM) Release- Based on previous consultant reports; discussions with ATF-Davidson representatives; historical correspondence from DEQE; and our own site inspection, there were no identified areas of oil and hazardous material releases within the Site, or within the property. The Phase I did not specify this fact. A Phase I Addendum can be provided that specifically states that no Oil and Hazardous Materials Release areas were known to exist.

Historical hazardous materials usage- As stated in the Phase I Report the "Arcade" building was initially (1944) constructed by Whitin Machine Works as an equipment warehouse. Some time after 1966, ATF-Davidson used the building for the production of graphic arts equipment. The only processes known to occur were metal turning, milling, grinding, metal treatment, assembly, painting and testing. There was no indication from discussions with the ATF-Davidson representatives or documents on file with the Department that hazardous materials were used on-site. At the time the Phase I Report was prepared, ATF-Davidson had already vacated the property and there was no evidence of

historical hazardous materials usage. As stated in the report, the principal facilities for formerly manufacturing operations that utilized hazardous materials were located at the adjacent mill property. The Phase I report does cite the present of an electric transformer. It should be noted that the DEQE had been involved with ATF-Davidson since the early 1980's. This included the period when ATF-Davidson maintained operations at the Arcade property. It was our understanding that the only unresolved environmental matter in 1997 was groundwater contamination associated with RTN 2-0111.

List of permits and environmental compliance history- There were no local, state or federal environmental permits, or oil and/or hazardous material storage permits issued for the Site or property. The Phase I did not specify this fact. There were no records of non-compliance notices, citations or Consent Agreements for the Site or property. The Phase I did not specify this fact. However, the Phase I specifically cited historical studies pertaining to the compliance history of ATF-Davidson in response to DEQE's specific requests. A Phase I Addendum can be provided that specifically states that no environmental permits or citations were issued against the Site or property.

Estimation of the population within 0.5 miles of the Site- This information was provided in Section IVA of the Numerical Ranking System Scoresheet submitted to the Department on April 4, 1997. A Phase I Addendum can be provided that specifically states that the population within 0.5 miles of Site ranges from 100-999 individuals.

Number of institutions within 500 feet of the Site- This information was provided in Section IVA of the Numerical Ranking System Scoresheet submitted to the Department on April 4, 1997. A Phase I Addendum can be provided that specifically states that there are no institutions within 500 feet of the Site.

Names and addresses of all Potentially Responsible Parties- The name and address of the Person Undertaking Response Action was listed on the BWSC-108 Form submitted with the Phase I Report. The only other known owners of the property were ATF-Davidson and White Consolidated, Inc. which was stated in the Phase I. It is our understanding that 310CMR40.043 does not require the addresses of all potentially responsible parties, but states that a list may (emphasis added) be provided in the Phase I.

Mumford River sediment studies- The Phase I report includes two studies by Caswell, Eichler & Hill pertaining to chromium in the Mumford River sediments. The studies were reported in October 1985 (Phase I-Appendix 1) and January 1986 (Phase I-Appendix 2). The Phase I report specifically reported that ATF-Davidson and White Consolidated, Inc. stated that chromium was never used at the Arcade facility, and chromium was not a constituent of concern based on the on-site sampling and analysis. The January 1986 Caswell, Eichler & Hill report clearly demonstrated that the highest concentrations of chromium were located in

sediment samples upstream of the Arcade property. Analytical results of groundwater samples collected from the Arcade monitoring wells reported non-detectable levels (<0.005 mg/L) of chromium (Caswell, Eichler & Hill, October 1985; Phase I-Appendix 1).

Soil and groundwater analysis for heavy metals- Groundwater results for heavy metals were reported by Caswell, Eichler & Hill in their October 1985 Report. None of the reported laboratory results indicated an exceedence of GW-1 standards with the exception of barium. In January 1986, in response to the DEQE's request, Caswell, Eichler & Hill performed heavy metal analyses of arsenic, barium and zinc in soil. According to their findings, none of the results exceeded S-1 standards.

Information in the file indicates that electroplating rinsewaters may have been disposed at the Site- The Department has indicated that this allegation is based on a June 19, 1991 DEP report that was not in the Department's files at the time of our investigation. That 1991 report alleged that the Arcade property was filled with constituents consisting of 90% spend foundry sand, 5% coal ash, 5% paint, plating sludge, plating rinsewaters, bromide salt baths, solvents and cutting oils. The information source that allowed the author to make that quantitative statement is unknown to us. We also question the validity of that statement having reviewed the historic reports submitted by the previous owner/operator and their consultants, and having interviewed key facility personnel regarding this specific matter. ATF-Davidson has always represented that no hazardous substances were deposited in the fill area. In May 1984, ATF-Davidson certified to the USEPA that prior to 1965 all of processing and waste waters were discharged into the Mumford River from the adjacent mill property. From 1965 until 1984 all wastewater was treated at the adjacent mill property. From 1984, ATF-Davidson discontinued the use of the on-site treatment system and shipped all wastes off-site. Based on historical documents, former owner testimony and on-site site assessment data there is no information to support the statement that electroplating rinsewaters were disposed at the Site.

Laboratory Analytical Reports and Chain of Custody- The documents were inadvertently left out of the Phase I report. They are available and can be provided in a Phase I Addendum report.

Approximate Limit of Contamination- Page 7 of the Phase I Report specifically identifies the location of contamination. The Phase I report states, "Analysis of groundwater samples indicated that VOC contamination was present only in monitoring wells M-3, M-6 and M-8. Analysis of samples from the other wells did not reveal VOC constituents. Analysis of the groundwater samples for priority pollutant metals; barium and cyanide revealed levels well below the Massachusetts Drinking Water Standards for all metals except barium. Barium was identified at concentrations near or slightly above that standard in monitoring wells M-4, M-5, M-6 and M-8.

310CMR 40.0482: Performance Standards

A Phase I Report shall provide sufficient information to meet the requirements of the Numerical Ranking System and Tier Classification process described in 310CMR 40.0500 or where appropriate, support a Response Action Outcome Statement filed for a site prior to Tier Classification.

As previous stated, the Phase I report included either in the text portion or Appendices sufficient information. If necessary, a Phase I Addendum can be prepared that would clearly state any information that the Department believes is necessary to support the NRS and Tier Classification submitted to the Department in March 1997.

Failure to Meet Response Action Outcome Performance Standards, 310CMR 40.1004

The MCP requires the use of Method 2 or 3 if contamination is present in significant concentrations in media other than soil or groundwater.

This requirement does not pertain to this Site, as the chromium contamination found in the river sediments was not associated with the Arcade property activities. As previously stated, Caswell, Eichler & Hill demonstrated through their sampling and analysis of benthic samples and on-site groundwater monitoring, that chromium was present at greater concentrations upstream of the Site, and all groundwater samples from the on-site monitoring wells had non-detectable chromium concentrations. It was the conclusion of Caswell, Eichler & Hill, the DEQE and Kroll that the chromium present in the river sediments was not associated with the Arcade property. Therefore, the RAO Statement was in compliance with the Performance Standards.

No Exposure points were identified,

FEB 25 2002

The only exposure points for the known groundwater contamination were the individual monitoring wells. Therefore, the RAO Statement was in compliance with the Performance Standards.

No exposure point concentrations were calculated.

This requirement does not pertain to this Site for the VOC contamination in groundwater. Therefore, the RAO Statement was in compliance with the Performance Standards.

The extent of the release was not indicated per 310CMR 40.0904

It is not clear what the cited deficiency refers to. As previously noted only three monitoring wells were found to have VOC and barium concentrations in excess the applicable standards. All other wells within the Site were less than standard; therefore the extent of the release was inherently defined. Therefore, the RAO Statement was in compliance with the Performance Standards.

There was no characterization of the OHM per 310CMR40.0904(3)

It is not clear what the cited deficiency refers to. The only known materials deposited in the fill area were coal ash and foundry sands. Both of which may have been the source of barium. As stated in the Phase I report and historical studies, the presence of VOC appeared to be from an unknown but localized source. Therefore, the RAO Statement was in compliance with the Performance Standards.

The Phase I recommends continued groundwater sampling for two to three years to ensure continued reduction of contaminant concentrations levels, however, no full round of groundwater samples were collected subsequently.

Groundwater samples were collected from all impacted wells in January 1997, May 1998, and August 1998. The purpose for recommending continuing groundwater monitoring was to support the fact that the VOC concentrations were decreasing over time due to natural attenuation. By continuing to monitor groundwater, we had sufficient data to support a Response Action Outcome Statement. Groundwater monitoring was only required until such time as the applicable standards were achieved. At that time, further monitoring was not required, and the RAO Statement was filed. Therefore, the RAO Statement was in compliance with the Performance Standards.

Failure to Meet Public Notice Requirements, 310CMR40.0485

FEB 25 2002

No notice to Public officials regarding the availability of the Phase I and Tier Classification was found in files available to the Department

DEP CE

The Phase I Report, Tier Classification and Numerical Ranking System Scoresheet were submitted to the Department in March and April 1997. Included in the submittals were:

1- Notice of an Environmental Response Action giving notice of a Phase I Initial Site Investigation Report Availability with copies submitted to the Chief Municipal Officer and Board of Health of the Town of Northbridge.
2- Notice of an Initial Site Investigation and Tier II Classification with transmittal request for publication to the Milford Daily News, Classified Ad. Dept.

If necessary, we would be please to provide the Department addition copies of the required notices that were filed with the appropriate authorities and local newspaper for publication.

Clipping from the newspaper or invoice as verification within seven (7) days of publication per 310CMR40.1403(6)(b).

The cited regulation does not specify that a clipping from the newspaper or an invoice is required. 310CMR40.1403(6)(b) states:

At least three days prior to publication of the legal notice, a copy of the notice shall be sent to the Chief Municipal Officer and the Board of Health in the community (ies) in which the disposal site is located and in any other communities which are, or are likely to be, affect by the disposal site. If the Department does not publish the legal notice, then a copy of the legal notice which includes the date of publication and the name of the newspaper and a copy of the cover letter to the Chief Municipal Officer and Board of Health, shall be submitted to the Department within seven days of publication of the legal notice.

As previously stated, a copy of the legal notice was sent to the Municipal Officer and Board of Health and was provided with the Phase I and Tier Classification. A copy of the legal notice was sent to the Milford Daily News was also provided to the Department. As we normally send a copy of the notice to the Municipal Officer and Board of Health without a cover letter, a cover letter was not provided with the various filings to the Department.

No copy of the notice to public officials regarding the availability of the RAO was found in the Department's files per 310CMR40.1403(f) and 40.1404(4).

A copy of the notice of the Response Action Outcome (RAO) Statement Availability to the Chief Municipal Officer and Board of Health was included as Appendix B of the RAO Statement filed with the Department.

Please note that we have not been able to locate the cited regulation 310CMR40.1403(f), and therefore can not respond to the allegation of non-compliance. 310CMR40.1404(4) does not apply to this Site as a Public Involvement Plan Site Designation does not apply to this Site.

Violation of 310cmr 40.0620(3)(a) and 40.0620(6) (Class II) Submittal of LSP evaluation Opinion and Tier Classification by Transition Deadline

The Transition Deadline for the site was August 2, 1995. A Tier Classification and an LSP Evaluation Opinion were submitted on March 12 and April 7, 1997, respectively.

Although the Department has indicated that this violation does not require further action, it is appropriate for us to ensure that accuracy of the facts of this citation. At the time that Arcade Realty Trust acquired the property it was their

understanding that all matters related to RTN 2-0111 were completed by ATF-Davidson in accordance with the MCP and DEP's requirements. This was supported by the fact that all correspondence from the Department was directed to ATF-Davidson. It was not until January 1997 with the issuance of a notice to publish a list of Tier I Site, that Arcade Realty Trust became aware of the situation. Immediately upon receipt of the Notice, Arcade Realty Trust retained Kroll to prepare the required filings that were subsequently submitted in March and April 1997.

As you can see, we do not agree with all of the allegations of non-compliance, and do not agree with the Department's requirement that the RAO Statement be retracted. It is our recommendation that the appropriate course of action is for the Department to meet with us to review the cited deficiencies and the information already submitted to the Department.

As previously requested, until we have had an opportunity to meet with the Department to review all issues, we respectfully request that the deadlines of action to be taken be reasonably extended.

Upon review of this information, should you have any questions and wish to schedule a meeting, please feel free to call me (978) 443-1833.

Thank you for your attention to this matter and our request.
KROLL, INC.

Neal M. Drawas
Managing Director

cc. Mary Gardner
James Moody
Leonard Jolles

2 Article Number

7106 4575 1292 5202 9238

3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

COMPLETE THIS SECTION ON DELIVERY

Received by (Please Print Clearly) D Duveway

B. Date of Delivery RA 1-2402

C. Signature

X D Duveway

☐ Agent
☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

Arcade Realty Trust
Main Street
Williamsville, MA 01588
Attn: Leonard Jeffries

PS Form 3811, June 2000

Domestic Return Receipt

UNITED STATES POSTAL SERVICE

WORCESTER MA
PM
24 JAN

First Class Mail
Postage & Fees Paid
USPS
Permit No G 10

• Print your name, address and ZIP Code below •

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
627 MAIN STREET
WORCESTER MA 01608-2022

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25
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CENTRAL - REGION

7106 4575 1292 5202 0

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided
Do Not Use for International Mail

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To:

Arcado Realty Trust
1 Main Street
Whitinsville, MA 01588
Attn: Leonard Jolles

PS Form 3800, June 2000 US Postal Service **Certified Mail Receipt**

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central Regional Office, 627 Main Street, Worcester, MA 01608

JANE SWIFT
Governor

BOB DURAND
Secretary

LAUREN A. LISS
Commissioner

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

JAN 23 2002

Arcade Realty Trust
1 Main Street
Whitinsville, MA 01588

Attention: Leonard Jolles,
Property Manager

Re: CRWSC - Northbridge
ATF-Davidson
1 Main Street

RTN 2-00111
NON-CE-01-3103

NOTICE OF NONCOMPLIANCE
M.G.L. c. 21E, 310 CMR 40.0000

FAILURE TO MEET PHASE I PERFORMANCE STANDARDS
FAILURE TO MEET RAO PERFORMANCE STANDARDS
FAILURE TO MEET MINIMUM PUBLIC NOTICE REQUIREMENTS

Dear Mr. Jolles:

A review of records conducted by Department of Environmental Protection ("Department") personnel demonstrates that the above-referenced site is not in compliance with one or more laws, regulations, orders, licenses, permits, or approvals enforced by the Department. Be advised that the regulations that generally set forth the requirements for Phase I Reports, Response Action Outcomes, and Public Involvement are codified at Subparts D, J, and N of the Massachusetts Contingency Plan, 310 CMR 40.0400, 310 CMR 40.1000, and 310 CMR 40.1400, respectively.

The Department has included with and specifically incorporated into this writing a NOTICE OF NONCOMPLIANCE SUMMARY, which includes:

(1) the requirements applicable to the response actions undertaken at, 1 Main Street, Northbridge, Massachusetts ("the Site");

(2) the elements and occurrence(s) of the noncompliance necessitating the issuance of this Notice; and
(3) the deadline(s) within which a return to compliance must be achieved, either by:

(i) coming into compliance with the applicable requirements, or
(ii) the submission of a written proposal to the Department setting forth how and when coming into compliance with the requirements will be achieved.

An administrative penalty may be assessed for every day from now on that you remain out of compliance with the requirements described in this Notice of Noncompliance. Notwithstanding this Notice of Noncompliance, the Department reserves the right to exercise the full extent of its legal authority in order to obtain full compliance with all applicable legal requirements, including but not limited to the assessment of civil administrative penalties, the commencement of a civil action in the court(s) of competent jurisdiction, or the commencement of a criminal prosecution in the court(s) of competent jurisdiction.

Please contact Mr. James Moody of the Central Regional Office at (508) 792-7650 x2703 if you have any questions or comments, or there is any ambiguity or confusion concerning this Notice. In responding to this Notice of Noncompliance, please reference the NON number found on the first page of this document to ensure proper acknowledgment of your response.

Sincerely,

Date: JAN 23 2002

Edmond G. Benoit
Deputy Regional Director
Bureau of Waste Site Cleanup

enclosure: NON Summary
EGB\MKG\MEB\GLR

cc: Town of Northbridge, Board of Health
Town of Northbridge, Board of Selectmen
Neal Drawas, Kroll Associates, Inc., 900 Third Avenue, New York, NY 10022
Thomas Potter, Audit Coordinator, BWSC, DEP-Boston
Office of Enforcement, DEP- Boston
James Moody, Enforcement Coordinator, BWSC, DEP-CERO
Daniel Hannon, Permits/Site Management, DEP-CERO
Michael Maher, Enforcement Coordinator, DEP-CERO
Nancy Smith, USEPA
Data Entry: [C&E/NON AUDINS/NAFNON AUDCO/NON]

NOTICE OF NONCOMPLIANCE SUMMARY
NON-CE-01-3103

ENTITY IN NONCOMPLIANCE

Arcade Realty Trust

LOCATION WHERE NONCOMPLIANCE OCCURRED OR WAS OBSERVED

1 Main Street, Northbridge, Massachusetts

DATE(S) WHEN NONCOMPLIANCE OCCURRED OR WAS OBSERVED

December 18, 1998

I. FAILURE TO MEET PHASE I PERFORMANCE STANDARDS, 310 CMR 40.0482

DESCRIPTION OF ACTIVITY OR OMISSION IN NONCOMPLIANCE

The Phase I report site plan had omissions that included: illustrated site boundaries, subsurface utilities, legible denotations of monitoring wells, sediment sampling locations, floor and storm drain locations, general areas of oil and hazardous material (OHM) releases. The report also did not include a history of hazardous material usage, a list of permits and environmental compliance history, an estimate of population within ½ mile of the site, the number of institutions within 500 feet of the site, and names and addresses of all potentially responsible parties.

Citing a 1985 report, the Phase I attributes significant levels of chromium in Mumford River sediments to the ATF-Davidson property (p. 8) or other upgradient source, but no subsequent investigation was conducted for chromium. Review of file materials for the audit did not reveal any indication of soil or groundwater analysis for heavy metals besides barium. Information in the file indicates that electroplating rinsewaters may have been disposed at the site, thus suggesting the potential for an on-site source. Sediment data from 1985 indicated the presence of chromium at concentrations of 64 ug/g, 410 ug/g, 250 ug/g, 400 ug/g, and 100 ug/g, in the river. No current sediment data was collected for the report.

The Phase I included a table of soil and groundwater data collected in 1996 and 1997, however, no chain of custody, nor laboratory analytical reports were included. No analytical method was specified.

The portion of the report pertaining to nature and extent of contamination was general discussion of levels of contamination and trends; no specific information was included that indicated where the approximate limits of the contamination were located.

DESCRIPTION OF REQUIREMENTS IN NONCOMPLIANCE

310 CMR 40.0482: Performance Standards

A Phase I Report shall provide sufficient information to meet the requirements of the Numerical Ranking System and Tier Classification process described in 310 CMR 40.0500 or, where appropriate, support a Response Action Outcome Statement filed for a site prior to Tier Classification.

II. FAILURE TO MEET RESPONSE ACTION OUTCOME PERFORMANCE STANDARDS, 310 CMR 40.1004

DESCRIPTION OF ACTIVITY OR OMISSION IN NONCOMPLIANCE

The Response Action Outcome Statement (RAO) and supporting risk characterization were inadequate to meet RAO performance standards per 310 CMR 40.1004 in the following ways:

1. The MCP requires the use of Method 2 or 3 if contamination is present in significant concentrations in media other than soil or groundwater. Because chromium exists in river sediments and there is a potential that plating operations could be a source of the wastes, Method 1 cannot be utilized for the risk characterization unless another demonstration is made pursuant to relative risks to receptors, per 310 CMR 40.0942.
2. No exposure points were identified.
3. No exposure point concentrations were calculated.
4. The extent of the release was not indicated per 310 CMR 40.0904(2).
5. There was no characterization of the OHM per 310 CMR 40.0904(3).
6. The Phase I recommends continued groundwater sampling for two to three years to ensure continued reduction of contaminant concentration levels, however, no full round of groundwater samples were collected subsequently.

Failure to meet RAO Performance Standards is a Class II violation.

III. FAILURE TO MEET PUBLIC NOTICE REQUIREMENTS, 310 CMR 40.0485, 40.1403 & 40.1404

DESCRIPTION OF ACTIVITY OR OMISSION IN NONCOMPLIANCE

A. No notice to public officials regarding the availability of the Phase I and Tier Classification was found in files available to the Department, per 310 CMR 40.1403(6)(b).

B. A copy of a legal notice draft was included in the Response Action Outcome, however, the Department requires a clipping from the newspaper or invoice as verification within seven (7) days of publication, per 310 CMR 40.1403(6)(b).
C. No copy of a notice to public officials regarding the availability of the RAO was found in the Department's files, per 310 CMR 40.1403(f) and 40.1404(4).

Failure to meet minimum public notice requirements is a Class II violation.

DESCRIPTION OF REQUIREMENTS IN NONCOMPLIANCE

310 CMR 40.1403: Minimum Public Involvement Activities in Response Actions

(3) At any time after the Department has been notified of a release or threat of release pursuant to 310 CMR 40.0300, the Chief Municipal Officer and Board of Health in the community(ies) in which the disposal site is located and in any other communities which are, or are likely to be, affected by the disposal site shall be notified of:

(e) the availability of any Response Action Outcome Statements filed pursuant to 310 CMR 40.1000.

1. Notification may take the form of copies of correspondence which contain or summarize decisions regarding the Statement or a notice of the availability of the Statement.

(4) Notifications required by 310 CMR 40.1403(3)(a), (b), and (d) may be made orally or in writing. Notifications required by 310 CMR 40.1403(3)(c), (e), (f), and (g) shall be made in writing.

(a) Oral notifications shall be followed by written notice within seven days of the oral notification.

(b) A copy of each written notice shall be submitted to the Department concurrently with its filing with the Chief Municipal Officer and Board of Health.

(6) Following Tier Classification or reclassification pursuant to 310 CMR 40.0510, the following actions shall be taken to inform the public about the status of the disposal site's classification:

(b) at least three days prior to publication of the legal notice, a copy of the notice shall be sent to the Chief Municipal Officer and the Board of Health in the community(ies) in which the disposal site is located and in any other communities which are, or are likely to be, affected by the disposal site. If the Department does not publish the legal notice, then a copy of the legal notice which includes the date of publication and the name of the newspaper, and a copy of the cover letter to the Chief Municipal Officer and Board of Health, shall be submitted to the Department within seven days of publication of the legal notice; and

DESCRIPTION OF DEADLINES OF ACTION TO BE TAKEN

An Audit Follow-up Plan to meet the requirements of a Phase II Scope of Work should be submitted to the Department by **March 1, 2002**. Please note that the site was tier classified on March 12, 1997, therefore, the Tier II classification is in effect until March 11, 2002. Sixty days prior to expiration of the Tier II classification, you should submit a Tier II extension request using form BWSC-107. In order for response actions to continue, a retraction of the Response Action Outcome Statement is necessary. The RAO retraction should be completed by **March 1, 2002.**

A Phase II – Comprehensive Site Assessment and a Phase III Remedial Alternatives Plan, if applicable or RAO should be submitted by **October 1, 2002.** A Phase IV Remedy Implementation Plan, if applicable, or an RAO should be submitted by **January 1, 2003**. Should Phase V activities be required, an RAO should be submitted no later than **December 31, 2003**.

Notify municipal officials of the availability of the Phase I – Limited Site Investigation and of the requirement to file a Tier II Extension to retain Tier II status beyond the March 11, 2001 expiration date by **March 1, 2002**. Copy the municipal correspondence to the Department within one week of mailing to the officials. Notify municipal officials of the availability of the Phase II report and upon completion of all subsequent Phase reports. The Department should be copied on these notices, also. Notify municipal officials upon re-filing an RAO in the future.

Sincerely,

Date JAN 23 2002

Edmond G. Benoit
Deputy Regional Director
Bureau of Waste Site Cleanup

2 Article Number

7106 4575 1292 5202 9429

3. Service Type **CERTIFIED MAIL**

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) DUVERNAY

B. Date of Delivery RA 1-24-02

C. Signature

X D. Duvernay

☐ Agent
☐ Addressee

D. Is delivery address different from item 1?
If YES, enter delivery address below:

☐ Yes
☐ No

PS Form 3811, June 2000

Domestic Return Receipt

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Print your name, address and ZIP Code below •

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
627 MAIN STREET
WORCESTER MA 01608-2022

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3/4

7106 4575 1292 5202 9

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No Insurance Coverage Provided
Do Not Use for International Mail

Postage	$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	$

Postmark Here

Sent To:

Arcade Realty Trust
1 Main Street
Whitinsville, MA 01588
Attn: Leonard Jolles

PS Form 3800, June 2000 US Postal Service **Certified Mail Receipt**

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Central Regional Office, 627 Main Street, Worcester, MA 01608

JANE SWIFT
Governor

BOB DURAND
Secretary

LAUREN A. LISS
Commissioner

JAN 23 2002

CERTIFIED MAIL: RETURN RECEIPT REQUESTED

Arcade Realty Trust
1 Main Street
Whitinsville, MA 01588

Attention: Leonard Jolles,
Property Manager

Re: CRWSC - Northbridge
ATF-Davidson
1 Main Street

RTN 2-00111

NOTICE OF AUDIT FINDINGS
NOTICE OF NONCOMPLIANCE
INTERIM DEADLINE

Dear Mr. Jolles,

On December 5, 2001, Arcade Realty Trust (hereafter referred to as you/your) was notified that the Massachusetts Department of Environmental Protection (the Department) had begun to audit response actions conducted to address the release of hazardous material at the location identified above. In particular, the audit focused on the tier classification at this site. This notice informs you of the results of the Department's audit.

DETERMINATION

As a result of the audit, the Department has determined that response actions were not performed in compliance with the requirements of the Massachusetts Contingency Plan (MCP). Violations were identified that require additional actions to be taken under the supervision of a Licensed Site Professional (LSP) in order to come into compliance with the MCP. The Audit Memorandum (attached) describes the activities Department personnel performed during the audit and summarizes relevant site information. A Notice of Noncompliance (attached) lists the identified violation(s) that require further action at this time.

The activities that are in noncompliance and the actions the Department wants you to take to come into compliance are described in the Notice of Noncompliance. The Notice of Noncompliance describes: (1) each activity identified during the audit which is in noncompliance, (2) the requirements violated, (3) the action the Department now wants you to take, and (4) the deadline for taking this action. An administrative penalty may be assessed for every day from now on that you are in noncompliance.

Additionally, the Department has determined that a violation of applicable requirements of the Massachusetts Contingency Plan (MCP) occurred, but do not warrant correction. Therefore, no additional actions are necessary for this violation at this time (see "Violations were identified that do not require further action"). The Audit Memorandum (attached) describes the activities Department personnel performed during the audit, summarizes relevant site information, and lists the violations that do not need further correction.

Although the Department is not requiring additional actions to address the violation identified in the Audit Memorandum, the Department may include this violation to establish a pattern of noncompliance if future enforcement actions are pursued.

A written Audit Follow-up Plan must be submitted to the Department in accordance with 310 CMR 40.1160. The Audit Follow-up Plan must set forth how and when you propose to confirm, demonstrate or achieve compliance with M.G.L. c.21E, the MCP and any other applicable requirements. To avoid enforcement actions, you must submit the Audit Follow-up Plan by no later than **March 1, 2002** including the form established by the Department (BWSC Transmittal Form 111, attached) for said purpose.

Pursuant to 310 CMR 40.1160(4), the Department has ninety (90) days to approve the plan. In approving the Audit Follow-up Plan, the Department may: (a) establish conditions, including but not limited to conditions setting forth the Department's role in overseeing elements of the Plan; (b) establish Interim Deadlines; (c) establish requirements for documentation and/or submittal information; and (d) take any other actions authorized by M.G.L. c. 21E, 310 CMR 40.0000, or any other applicable law. If you do not receive written approval from the Department within ninety (90) days of receipt of your plan, your plan is considered approved and you should proceed to implement the plan as proposed.

This deadline is hereby established as an Interim Deadline pursuant to the Department's authority under M.G.L. Chapter 21E, Section 3(j) and 310 CMR 40.0167.

LICENSED SITE PROFESSIONAL

A copy of this notice has been sent to Neal Drawas, LSP#9844, the LSP-of-Record for the Disposal site.

LIMITATIONS

The Department's findings were based upon the certainty of the information reviewed during the audit. These findings do not: (1) apply to actions or other aspects of the site that were not reviewed in the audit, (2) preclude future audits of past, current, or future actions at the site, (3) in any way constitute a release from any liability, obligation, action or penalty under M.G.L. c. 21E, 310 CMR 40.0000, or any other law, regulation, or requirement, or (4) limit the Department's authority to take or arrange, or to require any Responsible Party or Potentially Responsible Party to perform, any response action authorized by M.G.L. c. 21E which the Department deems necessary to protect health, safety, public welfare, or the environment.

If you have any questions regarding this Notice or any requirements contained in it, please contact Greg Root at 508-849-4017. Please reference the Release Tracking Number 2-0111 in any future correspondence to the Department regarding the site.

Very truly yours,

Date: JAN 23 2002

Mary Gardner
Section Chief
Audits/Site Management
Bureau of Waste Site Cleanup

0111- noaf

Attachments:
- Audit Memorandum
- Audit Follow-up Plan Transmittal Form & Post-Audit Completion Statement (BWSC-111)
- Notice of Noncompliance

cc :(w/o Attachments):
- Town of Northbridge, Board of Selectmen ✓
- Town of Northbridge, Board of Health ✓
- Neal Drawas, Kroll Associates, Inc., 900 Third Avenue, New York, NY 10022 ✓
- Thomas M. Potter, Audit Coordinator, DEP-Boston ✓
- Nancy Smith, USEPA ✓
- Data Entry: [RAO/ACTAUD AUDCO/INTLET AUDCO/NAFNON PHASE I ACTAUD]

AUDIT MEMORANDUM

I. AUDIT ACTIVITIES

The audit consists of the following activities:

- An examination of documents within the Department's records or in other public records.
- A Notice of Audit dated December 5, 2001.
- A Site Inspection on December 14, 2001.

II. SITE SUMMARY

The 27-acre site is currently leased for light industrial, warehousing and distribution uses. The Mumford River is adjacent to the site. The number of workers on the site is unknown. The nearest residence is approximately 100 feet from the site. No schools or day care facilities are located within 200 feet of the site. Potential source areas include: foundry sand in an unlined landfill that was reported to include 90% foundry sand, 5% coal ash, 5% paint, plating sludge, plating rinsewaters, bromide salt baths, solvents and cutting oils; sediment in the Mumford River contaminated with electroplating waste (maximum 410 mg/kg chromium).

Chronology

April 30, 1985	Notification of release to Department
April 30, 1985	NOR issued
October 15, 1987	Listed as a Location to be Investigated
March 12, 1997	Submittal of Phase I – Limited Site Investigation
March 12, 1997	Submittal of Tier II site classification
April 7, 1997	Submittal of LSP Evaluation Opinion
December 18, 1998	Class B-1 RAO was filed for the ATF-Davidson property

A subsurface investigation was conducted from October 1996 through January 1997 for the Phase I investigation, which included sampling of soil, sediment and groundwater media, but not surface water. Assessment activities beyond Phase I included sampling two monitoring wells in May 1998. Five monitoring wells located on-site were sampled and analyzed in August 1998 for barium and volatile organic compounds. The five wells sampled included resampling of two monitoring wells tested in May 1998. Seven geoprobe wells were advanced on January 17, 1997 and soil and groundwater samples were collected.

The 1997 geoprobe wells included one well (GP-6) where 74 ug/L of vinyl chloride were discovered in groundwater. Vinyl chloride was also discovered in groundwater from monitoring wells M-6 and M-8 at levels of 17.8 ug/L and 62.5 ug/L, respectively in October 1996. Soil from GP-6 included 25 ug/g (units unclear) vinyl chloride. A concentration of 290 ug/g acetone was present in soil from GP-2 and 200 ug/g (units unclear) acetone in soil from well GP-5.

Soil at the site consists of black foundry sand, native sand, fine gravel, cobbles and boulders with little silt. Groundwater flows south toward the Mumford River. Flow rate is approximately 23 feet per year. Bedrock was discovered to exist approximately 15 feet below grade. Groundwater is present at approximately 5 feet below grade.

No remediation has been conducted at the site and a Class B-1 RAO was submitted.

III. DOCUMENTS AUDITED

"Phase I Initial Site Investigation", March 1997, prepared by Neal Drawas, LSP No. 9844, Kroll Associates, Inc.

"Response Action Outcome (RAO) Statement", December 1998, prepared by Neal Drawas, LSP No. 9844, Kroll Associates, Inc.

"Tier Classification", March 1997, prepared by Neal Drawas, LSP No. 9844, Kroll Associates, Inc.

III (a). Risk Characterization

The RAO statement indicates that Method 1 cleanup standards were used to evaluate contamination levels at the site, the report indicates that a Method 1 risk characterization was utilized to determine No Significant risk, however, the Department has determined that several elements of a risk characterization were not included. No exposure points were identified, no exposure point concentrations were listed, there was no characterization of the oil and hazardous materials, per 310 CMR 40.0904(2), and the extent of the release was not defined. Maximum concentrations of contaminants in groundwater are: tetrachloroethylene 18 ug/L, trichloroethylene 3 ug/L, dichloroethylene 90 ug/L, vinyl chloride 82 ug/L, barium 4,700 ug/L. Maximum concentrations in soil are as follows, however, units were not specified in the table contained in the Phase I report: acetone 290 (possibly ug/kg), vinyl chloride (25 possibly ug/kg).

Soil and groundwater categories listed in the RAO are S-2 and GW-3. Groundwater exists at approximately five feet below grade across the site, therefore, GW-2 applies.

III. SITE INSPECTION

On December, 14, 2001, Mr. Greg Root of the Department met on-site with Mr. Neal Drawas, LSP of Record for the site from Kroll Associates, Inc. The site itself was observed, but no groundwater was collected for observation. Soil consists largely of coal-fired furnace waste and slag from smelting operations. Surface water in the Mumford River was observed to be free of oily sheens, other visible contamination and odors. No interior areas were observed, since sources of contamination have been determined to be outside disposal of wastes.

IV. DETERMINATIONS

On the basis of the activities performed during the audit and in reliance upon the accuracy of that information, the Department makes the following Determination.

A. Violations were identified that require further action

Please refer to the Notice of Noncompliance (attached) relative to the activities in noncompliance and the actions the Department wants you to take to come into compliance.

B. Violations were identified that do not require further action

Additionally, another violation was determined for which no further steps are necessary. Although the Department is not requiring additional actions to address the violation identified above, the Department may use this violation to establish a pattern of noncompliance when pursuing future enforcement actions.

Violation of 310 CMR 40.0620(3)(a) and 40.0620(6) (Class II) – Submittal of LSP Evaluation Opinion and Tier Classification by Transition Deadline

> The Transition Deadline for the site was August 2, 1995. A Tier Classification and an LSP Evaluation Opinion were submitted on March 12 and April 7, 1997, respectively.

File

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL REGIONAL OFFICE

WILLIAM F. WELD
Governor

ARGEO PAUL CELLUCCI
Lt. Governor

TRUDY COXE
Secretary

DAVID B. STRUHS
Commissioner

TRANSMITTAL:

TO: Mike Jennings
Roy F. Weston, Inc.
217 Middlesex Turnpike
Burlington, MA 01803

Site # 2-0111
Covitch
Main St.
Northbridge

INCLUDES:

Cover pages of Covitch and Arcade Phase I reports

Laboratory reports from 1996 sample analyses at Covitch Property

Table of 1996-1997 Laboratory Results of sampling on the Arcade Property

If you have any questions contact me at (508) 792-7653 Ext. 3841.

Very truly yours,

Gregory Root

Greg Root
Environmental Analyst
Waste Site Cleanup

627 Main Street • Worcester, Massachusetts 01608 • Telephone (508) 792-7650

Fax (508)792-7621

TTD #(508)767-2788

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Lt. Governor

TRUDY COXE
Secretary

DAVID B. STRUHS
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ATF DAVIDSON
Attn: PHILIP WHITNEY,
MAIN ST.
NORTHBRIDGE, MA 01534 Returned to Sender

January 8, 1997

RE: Publication of Tier I Disposal Site for Failure to Take Action
Release Tracking Number: **2-0000111**
Site Information: **ATF DAVIDSON**
1 MAIN ST, NORTHBRIDGE, MA

Dear Sir or Madam:

The purpose of this letter is to notify you that the Department of Environmental Protection (DEP) is preparing to publish a list of Tier I disposal sites, including "failure to take action" sites. The Tier I site list will include the above referenced property (Property) because either no response actions have been taken at the Property or response actions have not been conducted in compliance with applicable deadlines for conducting such actions. **If appropriate actions are taken by March 14, 1997, the Property will not be included as a "failure to take action" site. If you are a potentially responsible party and take appropriate action you may also avoid other DEP enforcement.**

Information available to the Department indicates that a release of oil and/or hazardous materials may have occurred at the Property. Chapter 21E of the Massachusetts General Laws and the Massachusetts Contingency Plan (the "MCP") govern the work required for assessment and cleanup of releases of oil and/or hazardous materials. Our files indicate that required assessment and cleanup activities at the Property have either not been started or have not been conducted in compliance with response action deadlines. The identification of releases and the initiation of response actions is critical to protecting public health and the environment. Therefore, in addition to publishing a list of Tier I sites, DEP will initiate enforcement against potentially responsible parties for those sites in noncompliance with the provisions of the law.

The Site List
In order to avoid publication of this Property on the Tier I, "Failure to Take Action" list, DEP must receive one of the following documents by March 14, 1997:

A) A Tier Classification Submittal prepared by a Licensed Site Professional (LSP) in accordance with the MCP at 310 CMR 40.0500, and a Tier I Permit application if applicable;
B) A Response Action Outcome (RAO) Statement prepared by an LSP in accordance with 310 CMR 40.1000; or
C) A Downgradient Property Status (DPS) Submittal prepared by an LSP in accordance with 310 CMR 40.0180.

If the above referenced Property was reported to DEP before 10/1/93, the following documents may be submitted instead of A, B or C above:

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D) An LSP Evaluation Opinion (described in 310 CMR 40.0600) indicating that:
1. there has not been a reportable release at this site and no response actions are necessary;
2. a reportable release has occurred but previous response actions sufficiently cleaned up the release to achieve a Class A or Class B Response Action Outcome (RAO);
3. the site is adequately regulated by another program in accordance with the MCP at 310 CMR 40.0110; or

E) A statement and supporting documentation in accordance with 310 CMR 40.0610(4) that a report was filed with the Department prior to October 1, 1993, which explicitly concluded that no further remedial actions were necessary.

Enforcement

Regardless of the status of a property on the Tier I site list, responsible parties are required to take actions under MGL Chapter 21E and the MCP. Potentially responsible parties include current owners for any site, as well as past owners where hazardous materials have been released. Please consider carefully the enclosed attachment for information about potentially responsible parties. If you are a potentially responsible party you may be subject to certain enforcement actions for failure to take appropriate action as described above. The potential for enforcement actions may be avoided if you submit a **written** statement or notification certified under pains and penalties of perjury, to DEP by February 17, 1997 as follows:

1) A **written** statement that you do not have nor did you ever have a connection to the Property that makes you a potentially responsible party. Include any information you have regarding those currently connected with the Property;

2) A **written** notification pursuant to 310 CMR 40.0172 asserting and demonstrating that you are financially, legally or technically unable to perform the above response actions; or

3) A **written** statement describing all response actions to date and a schedule for resuming response actions at the Property.

All submittals must be made to the Bureau of Waste Site Cleanup in the DEP Regional Office where the site is located (see attached map). Certain submittals, as indicated above, require you to employ a Licensed Site Professional (LSP) to provide the required information. LSP information and a list of LSPs can be obtained from the LSP Board of Registration at (617) 556-1091. Please note that if you do begin response actions, while you may avoid certain enforcement actions, you will be subject to Annual Compliance Assurance Fees for each year in which response actions have been or are conducted at this Property.

A copy of the MCP may be obtained from the Statehouse Bookstore in Boston by calling (617)727-2834 or in Springfield by calling (413)784-1376. **If you have other questions about the requirements for this Property described above, please call the MCP Help Line at (617) 338-2255 from the 617 area code and outside Massachusetts or (800) 462-0444 from the 413 and 508 area codes.**

Very truly yours,

James C. Colman

James C. Colman, Assistant Commissioner
Bureau of Waste Site Cleanup

Encl.: Attachment
Regional Map

Attachment: Potentially Responsible Parties Under MGL Chapter 21E

Under Massachusetts General Law (MGL) Chapter 21E, holds people responsible for ensuring that releases of oil and/or hazardous materials are cleaned up include current owners or operators of a site where a release of oil and/or hazardous materials has occurred, and any person who owned or operated a site at the time hazardous material was stored or disposed of. Potentially responsible parties also include persons who transported, disposed of, stored or treated hazardous material at a site from which there is or has been a release or threat of release of such material, or any persons who otherwise caused or are legally responsible for a release or threat of release of oil or hazardous material at a site.

Liability under Chapter 21E is "strict", meaning it is not based on fault, but solely on a person's status as an owner, operator, generator, transporter or disposer. It is also joint and several, meaning that a responsible party may be liable for all response action costs incurred at the site, regardless of the existence of any other liable parties. Please consult Section 5(a) of MGL Chapter 21E for the complete information regarding your potential liability.

If you are a potentially responsible party and fail to initiate actions required by MGL Chapter 21E and the Massachusetts Contingency Plan (MCP), you may be subject to administrative penalties for failing to conduct response actions in a timely manner. In addition, the Department is authorized by MGL c. 21E to have the work performed by its contractors. In this case, you may be held liable for up to three times DEP's costs for conducting response actions at a property should DEP intervene. By taking such actions yourself, you can avoid liability for response action costs incurred by the Department and its contractors in performing these actions, and any sanctions which may be imposed for failure to perform response actions under the MCP.

Penalties and the response costs of DEP are considered a debt to the Commonwealth. Such debts may be recovered by attaching any monies that are owed to you by the Commonwealth (tax refunds, etc.) or by placing liens on real property owned by you in Massachusetts.

Department of Environmental Protection
Emergency Response Contacts

To report a release or threat of release of oil or hazardous materials **during regular business hours**, call the Emergency Response Team in the DEP Regional Office that serves the affected community (see below).

DEP Western Region
436 Dwight Street
Springfield, MA 01103

413-784-1100

Adams, Agawam, Alford, Amherst, Ashfield, Becket, Belchertown, Bernardston, Blandford, Brimfield, Buckland, Charlemont, Cheshire, Chester, Chesterfield, Chicopee, Clarksburg, Colrain, Conway, Cummington, Dalton, Deerfield, Easthampton, East Longmeadow, Egremont, Erving, Florida, Gill, Goshen, Granby, Granville, Great Barrington, Greenfield, Hadley, Hampden, Hancock, Hatfield, Hawley, Heath, Hinsdale, Holland, Holyoke, Huntington, Lanesborough, Lee, Lenox, Leverett, Leyden, Longmeadow, Ludlow, Middlefield, Monroe, Montague, Monterey, Montgomery, Monson, Mount Washington, New Ashford, New Marlborough, New Salem, North Adams, Northampton, Northfield, Orange, Otis, Palmer, Pelham, Peru, Pittsfield, Plainfield, Richmond, Rowe, Russell, Sandisfield, Savoy, Sheffield, Shelburne, Shutesbury, Southampton, South Hadley, Southwick, Springfield, Stockbridge, Sunderland, Tolland, Tyringham, Wales, Ware, Warwick, Washington, Wendell, Westfield, Westhampton, West Springfield, West Stockbridge, Whately, Wilbraham, Williamsburg, Williamstown, Windsor, Worthington

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627 Main Street
Worcester, MA 01605

508-792-7653

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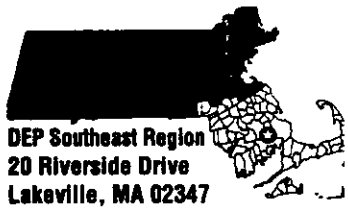

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Nights, Weekends and Holidays:

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Lt. Governor

TRUDY COXE
Secretary

DAVID B. STRUHS
Commissioner

WHITE CONSOLIDATED INDUSTRIES
Attn: WARD SMITH, PRESIDENT
15 ADAMS ST
BURLINGTON, VT 44111-

Returned to Sender

January 8, 1997

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Release Tracking Number: **2-0000111**
Site Information: **ATF DAVIDSON**
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Very truly yours,

James C. Colman

James C. Colman, Assistant Commissioner
Bureau of Waste Site Cleanup

Encl.: Attachment
Regional Map

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Springfield, MA 01103

413-784-1100

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Worcester, MA 01605

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DEP Southeast Region
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508-946-2850

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DEP Northeast Region
10 Commerce Way
Woburn, MA 01801

617-932-7681
617-932-7697

Amesbury, Andover, Arlington, Ashland, Bedford, Belmont, Beverly, Billerica, Boston, Boxford, Braintree, Brookline, Burlington, Cambridge, Canton, Carlisle, Chelmsford, Chelsea, Cohasset, Concord, Danvers, Dedham, Dover, Dracut, Essex, Everett, Framingham, Georgetown, Gloucester, Groveland, Hamilton, Haverhill, Hingham, Holbrook, Hull, Ipswich, Lawrence, Lexington, Lincoln, Lowell, Lynn, Lynnfield, Malden, Manchester-By-The-Sea, Marblehead, Medfield, Medford, Melrose, Merrimac, Methuen, Middleton, Millis, Milton, Nahant, Natick, Needham, Newbury, Newburyport, Newton, Norfolk, North Andover, North Reading, Norwood, Peabody, Quincy, Randolph, Reading, Revere, Rockport, Rowley, Salem, Salisbury, Saugus, Sherborn, Somerville, Stoneham, Sudbury, Swampscott, Tewksbury, Topsfield, Wakefield, Walpole, Waltham, Watertown, Wayland, Wellesley, Wenham, West Newbury, Weston, Westwood, Weymouth, Wilmington, Winchester, Winthrop, Woburn

Nights, Weekends and Holidays:

Dial 617-292-5500

MEMORANDUM TO FILE

FROM: Molly Elder, BWSC Enforcement Coordinator
DATE: April 23, 1997
SUBJECT: TIER 1B DEFAULT, FAILURE TO TAKE ACTION

SITE # or RTN: 2 0111

As a result of the "Failure to Take Action Letter" dated January 8, 1997 sent from the Boston office to the PRP/s (listed in the DEP database at the time) for this site, and any subsequent response from PRP/s, the following recommendation concerning listing as a Tier 1B is made:

X This site should NOT be listed as Tier 1B by Default. Although it was out of compliance, an adequate action and/or submittal was rec'd by the 3/14/97 deadline.

___ This site should NOT have rec'd the Jan 8th letter because compliance was achieved prior to the mailing of the letter.

___ This site should be LISTED as a TIER 1B by Default. Although, some correspondence was rec'd, it was not the necessary submittal for compliance to be achieved.

___ This site should be LISTED as TIER 1B by Default. No response to the Jan 8th was rec'd.

Additional Notes: TC II rec'd 3/12/97 (incomplete admin) – to be rectified by 4/7.

FRONT END SITES DATABASE CHANGE FORM

(completed by BWSC staff)

RTN #/SITE ID #: 2- 0111 **Related #:** 2-

RTN/SITE NAME OR ADDRESS: 1 Main Str. Northbridge (ATF Davidson)
STAFF SUBMITTING CHANGE: Molly Elder **DATE:** 3-31-97
AUTHORIZATION (Branch or Sect. Chief/RE):

REASONING FOR CHANGE (Not Optional):
One or more letters (Jan 8th Failure To Take Action letter) was "returned to sender" for this RTN. The legal intern called town assessors office to obtain name &/or address of current owner: current owner is Sidney Covich

if email or RLFA, is there a copy attached? (Y or N)

CHANGE/ADD

	FIELD	FROM	TO
1)	PRP: Whitinsville Realty Sidney Covich	Main Str (Whitinsville)	1 Main Str
2)	PRP address invalid:	Philip Whitney North Bridge, MA	→ returned to sender
3)	PRP address invalid:	White Consolidated Burlington VT	→ returned to sender

FEES for transition sites (must attach copy of email)

TYPE	Date cleared by Boston	SITE ID #

cc file
revised 7/18/95
P:\KDAOUST\WP\CHNGFRM.WP

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

WILLIAM F. WELD
Governor

ARGEO PAUL CELLUCCI
Lt. Governor

TRUDY COXE
Secretary

DAVID B. STRUHS
Commissioner

WHITINSVILLE REALTY TRUST
Attn: SIDNEY COVICH,
MAIN ST
WHITINSVILLE, 01588-

January 8, 1997

RE: Publication of Tier I Disposal Site for Failure to Take Action
Release Tracking Number: **2-0000111**
Site Information: **ATF DAVIDSON**
1 MAIN ST, NORTHBRIDGE, MA

Dear Sir or Madam:

The purpose of this letter is to notify you that the Department of Environmental Protection (DEP) is preparing to publish a list of Tier I disposal sites, including "failure to take action" sites. The Tier I site list will include the above referenced property (Property) because either no response actions have been taken at the Property or response actions have not been conducted in compliance with applicable deadlines for conducting such actions. **If appropriate actions are taken by March 14, 1997, the Property will not be included as a "failure to take action" site. If you are a potentially responsible party and take appropriate action you may also avoid other DEP enforcement.**

Information available to the Department indicates that a release of oil and/or hazardous materials may have occurred at the Property. Chapter 21E of the Massachusetts General Laws and the Massachusetts Contingency Plan (the "MCP") govern the work required for assessment and cleanup of releases of oil and/or hazardous materials. Our files indicate that required assessment and cleanup activities at the Property have either not been started or have not been conducted in compliance with response action deadlines. The identification of releases and the initiation of response actions is critical to protecting public health and the environment. Therefore, in addition to publishing a list of Tier I sites, DEP will initiate enforcement against potentially responsible parties for those sites in noncompliance with the provisions of the law.

The Site List

In order to avoid publication of this Property on the Tier I, "Failure to Take Action" list, DEP must receive one of the following documents by March 14, 1997:

A) A Tier Classification Submittal prepared by a Licensed Site Professional (LSP) in accordance with the MCP at 310 CMR 40.0500, and a Tier I Permit application if applicable;
B) A Response Action Outcome (RAO) Statement prepared by an LSP in accordance with 310 CMR 40.1000; or
C) A Downgradient Property Status (DPS) Submittal prepared by an LSP in accordance with 310 CMR 40.0180.

If the above referenced Property was reported to DEP before 10/1/93, the following documents may be submitted instead of A, B or C above:

Printed on Recycled Paper

1. there has not been a reportable release at this site and no response actions are necessary;
2. a reportable release has occurred but previous response actions sufficiently cleaned up the release to achieve a Class A or Class B Response Action Outcome (RAO);
3. the site is adequately regulated by another program in accordance with the MCP at 310 CMR 40.0110; or

E) A statement and supporting documentation in accordance with 310 CMR 40.0610(4) that a report was filed with the Department prior to October 1, 1993, which explicitly concluded that no further remedial actions were necessary.

Enforcement

Regardless of the status of a property on the Tier I site list, responsible parties are required to take actions under MGL Chapter 21E and the MCP. Potentially responsible parties include current owners for any site, as well as past owners where hazardous materials have been released. Please consider carefully the enclosed attachment for information about potentially responsible parties. If you are a potentially responsible party you may be subject to certain enforcement actions for failure to take appropriate action as described above. The potential for enforcement actions may be avoided if you submit a **written** statement or notification certified under pains and penalties of perjury, to DEP by February 17, 1997 as follows:

1) A **written** statement that you do not have nor did you ever have a connection to the Property that makes you a potentially responsible party. Include any information you have regarding those currently connected with the Property;

2) A **written** notification pursuant to 310 CMR 40.0172 asserting and demonstrating that you are financially, legally or technically unable to perform the above response actions; or

3) A **written** statement describing all response actions to date and a schedule for resuming response actions at the Property.

All submittals must be made to the Bureau of Waste Site Cleanup in the DEP Regional Office where the site is located (see attached map). Certain submittals, as indicated above, require you to employ a Licensed Site Professional (LSP) to provide the required information. LSP information and a list of LSPs can be obtained from the LSP Board of Registration at (617) 556-1091. Please note that if you do begin response actions, while you may avoid certain enforcement actions, you will be subject to Annual Compliance Assurance Fees for each year in which response actions have been or are conducted at this Property.

A copy of the MCP may be obtained from the Statehouse Bookstore in Boston by calling (617)727-2834 or in Springfield by calling (413)784-1376. **If you have other questions about the requirements for this Property described above, please call the MCP Help Line at (617) 338-2255 from the 617 area code and outside Massachusetts or (800) 462-0444 from the 413 and 508 area codes.**

Very truly yours,

James C. Colman

James C. Colman, Assistant Commissioner
Bureau of Waste Site Cleanup

Encl.: Attachment
Regional Map

Printed on Recycled Paper

Attachment: Potentially Responsible Parties Under MGL Chapter 21E

Under Massachusetts General Law (MGL) Chapter 21E, holds people responsible for ensuring that releases of oil and/or hazardous materials are cleaned up include current owners or operators of a site where a release of oil and/or hazardous materials has occurred, and any person who owned or operated a site at the time hazardous material was stored or disposed of. Potentially responsible parties also include persons who transported, disposed of, stored or treated hazardous material at a site from which there is or has been a release or threat of release of such material, or any persons who otherwise caused or are legally responsible for a release or threat of release of oil or hazardous material at a site.

Liability under Chapter 21E is "strict", meaning it is not based on fault, but solely on a person's status as an owner, operator, generator, transporter or disposer. It is also joint and several, meaning that a responsible party may be liable for all response action costs incurred at the site, regardless of the existence of any other liable parties. Please consult Section 5(a) of MGL Chapter 21E for the complete information regarding your potential liability.

If you are a potentially responsible party and fail to initiate actions required by MGL Chapter 21E and the Massachusetts Contingency Plan (MCP), you may be subject to administrative penalties for failing to conduct response actions in a timely manner. In addition, the Department is authorized by MGL c. 21E to have the work performed by its contractors. In this case, you may be held liable for up to three times DEP's costs for conducting response actions at a property should DEP intervene. By taking such actions yourself, you can avoid liability for response action costs incurred by the Department and its contractors in performing these actions, and any sanctions which may be imposed for failure to perform response actions under the MCP.

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DEPARTMENT OF ENVIRONMENTAL PROTECTION
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Lt. Governor

TRUDY COXE
Secretary

DAVID B. STRUHS
Commissioner

ATF DAVIDSON
Attn: PHILIP WHITNEY,
MAIN ST.
NORTHBRIDGE, MA 01534

January 8, 1997

RE: Publication of Tier I Disposal Site for Failure to Take Action
Release Tracking Number: **2-0000111**
Site Information: **ATF DAVIDSON**
1 MAIN ST, NORTHBRIDGE, MA

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James C. Colman

James C. Colman, Assistant Commissioner
Bureau of Waste Site Cleanup

Encl.: Attachment
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Secretary

DAVID B. STRUHS
Commissioner

WHITE CONSOLIDATED INDUSTRIES
Attn: WARD SMITH, PRESIDENT
15 ADAMS ST
BURLINGTON, VT 44111-

January 8, 1997

RE: Publication of Tier I Disposal Site for Failure to Take Action
Release Tracking Number: **2-0000111**
Site Information: **ATF DAVIDSON**
1 MAIN ST, NORTHBRIDGE, MA

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Very truly yours,

James C. Colman

James C. Colman, Assistant Commissioner
Bureau of Waste Site Cleanup

Encl.: Attachment
Regional Map

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SCANNED

WHITE CONSOLIDATED INDUSTRIES, INC.
CLEVELAND, OHIO 44111

DANIEL MARQUES, P. E.
ENGINEER
ENERGY & ENVIRONMENTAL AFFAIRS

December 18, 1985

Ms. Susan Cordman
Division of Hazardous Waste
The Commonwealth of Massachusetts
Department of Environment Quality Engineering
Central Region
75 Grove Street, Box 13
Worcester, Massachusetts 01605

Dear Susan:

The following is a description of the system to be implemented on the Covitch property, located in Whitinsville, Massachusetts, to remove oil from the area which is outlined in our Report (White Consolidated Industries, Inc.) Appendix "C", issued to your department in October of 1985, identified as "The Monitoring Well Installation and Soil and Water Quality Analysis - Sidney Covitch Properties - Whitinsville, Massachusetts".

The proposed system includes an interceptor trench approximately 130 to 140 feet long and 15 feet deep to intercept flow of oil from under and around Building 9 into the Raceway. This trench will be filled with crushed stone or other suitable drainage material. The downstream side of the trench will be lined with an impermeable liner at the proper depth. (Refer to Page 3 and Appendix "C" of the Report in your possession, dated September of 1985 for exact location.)

One recovery well will be located near the trench and outfitted with a Petropurge System to create a "cone depression", separate the oil, and pump it into a recovery tank located at a site provided adjacent to Building 9, and the water will be put through an Air Stripping System which will discharge water at a rate of approximately 5 to 10 gallons per minutes during the early life of the project and diminishing with time. According to past performance of the system proposed, the effluent (water) being discharged should contain less than 100 ppb of volatile organics. The entire system efficiency is approximately 99%.

RECEIVED
DEC 19 1985
Div. Solid/Hazardous Waste

Sketches of the Petropurge and Airpurge System is enclosed for your information. Based on the system described, it is requested that the system and the discharge of water into the Northbridge Sewer Department will be approved on its entirety.

Monitoring and maintenance of the system will be performed by NEPCCO, 29 Wall Street, Foxboro, Massachusetts, 02035 - 617/543-8458 - Paul Guena.

As agreed at the November meeting held at your office, the deficiency outlined in Appendix "C" of the Report is the only remaining item in the Report which White Consolidated Industries is liable for. The rest of the property sold to Sidney Covitch is free and clear of all hazardous waste in accordance with the hydrogeolic study site assessment conducted by Caswell, Eichler and Hill, Inc., Portsmouth, New Hampshire submitted to your department in November of 1985.

As of November 1985 any hazardous waste, ground or water contamination, except for the contamination exhibited in Appendix "C" of the Hydrogeolic Assessment mentioned above, will be the sole responsibility of The Shop - Sidney Covitch.

Your utmost attention to this memorandum will be extremely appreciated. If you have any questions, do not hesitate to contact the writer at 216/252-3700, Extension 404.

Very truly yours,

Daniel Marques

/ecc
Attachment

cc: K. E. Ware
D. S. Mattis
W. G. Jacobs
J. L. Calhoun

RECEIVED
DEC 19 1985
Div. Solid/Hazardous Waste

DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING

CENTRAL REGION OFFICE

75 GROVE STREET, WORCESTER, MASSACHUSETTS

ATTENDANCE SHEET

Meeting Purpose: Covich Property, Northbridge, MA

DATE: 12/16/85

Meeting Location: DEQE CRO, Worcester, MA

NAME	ORGANIZATION	ADDRESS	TELEPHONE #
1. MATT EICHLER	CASWELL EICHLER & HILL	P.O. Box 4696 NEWINGTON, N.H.	603-431-4899
2. DANIEL MARQUES	WHITE CONSOLIDATED IND	CLEVELAND	216-252-3700
3. Susan Corderman	DEQE-DSHW	75 Grove St. Worcester	792-7653
4. JEFFREY G. ANDREWS	DEQE - DWPC	" "	792-7650
5. John Desmond	DEQE	" "	"
6.			
7.			
8.			
9.			
10.			
11.			
12.			
13.			
14.			
15.			

MJB/1985

Caswell, Eichler and Hill, Inc.
GEOLOGY HYDROLOGY GEOPHYSICS
P.O. Box 4696
Portsmouth, NH 03801
TEL. (603) 431-4899

October 29, 1985

White Consolidated Industries, Inc.
11770 Berea Road
Cleveland, Ohio 44111

Attn: Mr. Dan Marques, P.E.

Re: 10-24-85 Meeting at DEQE Offices, Worcester, MA

Dear Dan:

Per the agreements arrived at during our meeting with DEQE, CEH had been given five action items to pursue. They were:

1. Research the availability of a comprehensive hazardous materials handling text.

2. Instruct RAI to evaluate the ten highest peaks of organic chemicals present (other than those chemical compounds included in the EPA 624 analysis already completed) in each of the Arcade water samples (M-1 through M-8), the three auger probe soil samples (AP-104, S-4; AP-105, S-1; AP-105, S-3) taken from the Building 9/Raceway area, and the Covitch property water samples (MC-1, 2, 3, 7, 10, 11, 12, 13, 14 and 15).

3. Select soil samples taken during monitoring well construction from MC-7 and MC-10, and have them tested for barium, arsenic and zinc.

4. Determine a quarterly sampling schedule for the Arcade monitoring wells to include volatile organic compounds (EPA 624, and others to be determined by outcome of #2 above), barium, arsenic, zinc, pH, conductivity and temperature.

5. Take additional benthic samples from the Mumford River, and conduct an EP Toxicity Test on each sample.

To date, the following actions have been taken on the above five items:

1. The hazardous materials text:

   TITLE: MATERIAL SAFETY DATA SHEETS COLLECTION (2 Vols.)

   ORDER: GENIUM PUBLISHERS
   1145 CATALYN STREET
   SCHENECTADY, NY 12303-1836

2. All tasks discussed have been begun. A preliminary progress report should be forthcoming in several weeks.

3. The soil samples were delivered to RAI, and the data should be available in several weeks.

4. The quarterly sampling schedule is as follows:

   1st November 14, 1985
   2nd February 12, 1986
   3rd May 14, 1986
   4th August 13, 1986

5. CEH and RAI will be collecting the benthic samples on November 14, 1985. Laboratory data should be completed several weeks thereafter.

Several other WCI action items were discussed during our meeting. To summarize our notes:

1. <u>Building 9/Raceway area</u>

   a. Prepare a work plan to construct and operate a collection trench/oil separator along the raceway. This plan must include a good reason why WCI is not simply removing all of the contaminated soil and ground water, and transporting it to a secure landfill or other disposal facility.

   b. Obtain a ground water discharge permit for the recycling of water that has been separated from the oil. Forms are available from Susan Corderman.

   c. The work plan should duscuss options for determining the level of oil contamination on the south side of the raceway (monitoring well, deep test pit), and how clean up or containment will be handled should problem levels exist. The work plan should also discuss long term monitoring of the south side of the raceway. The placement of a monitoring well or two should suffice.

   d. The work plan should state that once construction of the trench/separator is completed, the raceway will be once again thoroughly cleaned.

2. River Bottom

a. Have WCI legal personnel establish who owns the Mumford River bottom.

b. If WCI or ATF/D does not own the river bottom, have WCI legal submit a brief to DEQE so stating, and denying responsibility for the presence or clean-up of chromium known to be present in the benthic sediments.

c. Check meaning of Traverse Line across the Mumford River that is labeled White Consolidated Industries on FIGURE 2, PLATE I of the Covitch property report. Also check to see if Mr. Covitch owns any of the river bottom on the other side of the traverse should it be determined that WCI or ATF/D owns the river bottom to that point. Mr. Covitch may be a slightly different case in that he owns the dam which creates Whitin Pond.

Should you have any questions regarding the content of this letter, or should you need any assistance with the Building 9/Raceway work plan, please call.

Very truly yours,
CASWELL, EICHLER & HILL, INC.

Matthew F. Eichler III
Principal

MFE/SKK

Covitch

WHITE CONSOLIDATED INDUSTRIES, INC.
CLEVELAND, OHIO 44111

EXECUTIVE OFFICES

RICHARD E. HILL, P.E.
ENVIRONMENTAL ENGINEER

RECEIVED
JUL 24 1985
Div. Solid/Hazardous Waste

July 22, 1985

Ms. Susan Corderman
Division of Hazardous Waste
The Commonwealth of Massachusetts
Department of Environmental Quality Engineering
Central Region
75 Grove Street, Box 13
Worcester, Massachusetts 01605

Dear Susan:

This is to memorialize the discussion at our meeting held in your office on July 17, 1985. John Desmond and Matt Eichler were also in attendance.

We agreed to sample the location #1 of the oil pit area again. This time we would perform an EP toxicity test (metals only), total metals and a metals leachate with pH set at the value found in the ground water in that area. Further, we will add metals analysis to soil samples taken on the Covich property hydrogeological study. PCB results will be reported to you from the oil pit sampling and analyses efforts of Rhode Island Analytical Laboraties (attached) as they become available. Finally phenol testing will be performed on Covich wells Numbers 7 and 14.

We discussed the remediation of the oil contamination adjacent to building #9 in some length. Dan Marques is soliciting quotes from Clean Harbors, Jetline and O&H Materials for both a total removal of contaminated soil and oil, and installation of an oil purging system. Discussion touched on the pros and cons of each approach.

The oil purging system, which is envisioned to consist of a collection trench or field tile that would feed a sump containing an oil-water separator of some form. The oil would be collected and periodically removed. The water would be replaced upgradient of the oil pocket in order to effect a recycle purging system. The area would be paved and sealed to prevent the introduction of additional water resulting from precipitation.

Ms. Susan Corderman
Division of Hazardous Waste
The Commonwealth of Massachusetts

This approach is favored by relatively low cost and low risk. Permiting difficulties and operating attendance during the several months required for complete purging militate against this approach.

The total removal option is favored by the fact that it would be over and done with relatively soon (assuming the facility that receives this material doesn't become a Superfund site in its own right). Operating against the total removal option are both its anticipated greater cost and greater risk. The risk is primarily the result of the effect of removal of large quantities of soil on nearby building foundations and the many underground utilities in the area.

We agreed that both more information was needed before a decision could be made, and that WCI was taking prudent and prompt measures to acquire that information. John and you indicated that your agency probably could be comfortable with either approach.

You gave us the necessary paperwork for a groundwater discharge permit, which is necessary for the oil purging option. You also gave us the written approval for the Covich site assessment plan we had earlier submitted. Further, you reminded us that a health and safety plan was necessary for the activities necessary to correct the oil contamination problem. We indicated that all the well drilling efforts on both the landfill and Covich property was complete, and that sample collection would be undertaken shortly.

I trust that this is an accurate summary of our meeting.

Sincerely,

Richard E. Hill

Richard E. Hill

/ecc
Attachment

cc: S. Covich
J. Desmond
M. F. Eichler
D. Marques

MEMORANDUM

TO: File

THRU: Susan Corderman SAC

FROM: Alan Weiss AEW

DATE: July 22, 1985

SUBJECT: ATF Davidson, Whitinsville, MA

Commencing the week of Monday, July 8, 1985, CEH began the field sampling program at the Arcade and Covich properties in Whitinsville, Massachusetts.

At 1:30 p.m. on July 8, 1985, A. Weiss and S. Corderman (DEQE) met with Dan Marcus (ATF-D), Matt Eichler and Richard Hill (CEH) at the Arcade property. After observing the drilling operation on the Arcade property, and discussing: (1) the (flyash) material encountered in the boreholes, and (2) the monitoring well construction and locations the field meeting adjourned.

A meeting to discuss the results of metals analysis from samples collected behind building #9 at the Covich property was held after the above mentioned field visit, DEQE agreed that the Covich Site work should begin.

Subsequent site visits were made on Tuesday, Thursday and Friday of that week.

Should be "Covitch" R. Adler 11/28/88

By Tuesday all wells on the Arcade property completed in the Flyash landfill had been constructed, and were then developed on Wednesday. On Thursday, wells 6, 8, 9 were abandoned due to shallow refusal. Wells 3 and 5 were set and encountered fill to 7' and native M-C Sand to 10' (W.T.@ 7.5'). Well #4 was also abandoned to refusal at 5 feet, with water at 4.5 feet. Wells 1,2,7 and 10 were set in M-C sand 0-7' and sandy till 7' - 12'. The well depths are 9.5' - 12' and encountered water at (5'-8.75').

On Monday, July 15, 1985, Auger probes in the tail race area behind building #9 were made. Oily smelling fill was encountered in all four holes (AP-101, 102,103,104) in fill to 7'-8' with F. - M. sand and F. sandy till found at 8' - 12'. The most odorous samples were near the water table (7'-8', HNU 7-12 ppm). Water in the trench near building 9 was at 7', while water in the race was at 10'.

june 1985						
S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23/30	24	25	26	27	28	29

july 1985						
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28	29	30	31			

august 1985						
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september 1985						
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22	23	24	25	26	27	28
29	30					

HNU

MONDAY JULY 15 thru SUNDAY JULY 21

Monday July 15 196/169

Back = 1.8

8 AP-101: refusal @ 7' grey blk fill. 1
AP-102 8-10' oil sat'd m-c Snd, g-fill.
9 W.T. = 7.5' 10'-12 less" F-M Sng, silt 7-12 2
12'-14' F Snd - silt 4.5-7
10 AP 103 refusal @ 8.75' blk. fill. 3
AP 104 8'-10' Vodorous blk Stg
11 10'-12' odurous grey + blk Stg, 11' grey till 4
- see water from 10'-15'.
12 - trend W.T. @ 7.5 ~~[illegible]~~ 5
evening
12'-13.5' Stg. odor grey till.

Tuesday July 16 197/168

8 EPA Sampling Course 1
Lexington
9 2
10 3
11 4
12 5
evening

Wednesday July 17 198/167

8 EPA Sampling Course 1
9 2
10 3
11 4
12 5
evening

Thursday July 18 199/166

8 EPA Sampling Course 1
9 2
10 3
11 4
12 5
evening

Friday July 19 200/165

8 1
9 2
10 3
11 4
12 5
evening

Saturday July 20 201/164

Sunday July 21 202/163

AT A GLANCE®

june 1985						
S	M	T	W	T	F	S
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23/30	24	25	26	27	28	29

july 1985						
S	M	T	W	T	F	S
	1	2	3	4	5	6
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august 1985						
S	M	T	W	T	F	S
				1	2	3
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11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

september 1985						
S	M	T	W	T	F	S
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8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

Monday July 8 189/176

8 - M. Conway, GZA called, 555 Main Hudson
9 - response to F. Parsen drafted, site needs
10 Source ID, remed, Sump.
11
12

- ATF Davidson Field visit, Eichler Hill, Marcus, Niel for Cavich presenti

evening

Tuesday July 9 190/175

8 - 555 main - 21E WENOIR, Draft.
9
10
11
12

ATF Davidson field visit,

completed Arcade wells

evening

Wednesday July 10 191/174

8
9 developed wells on Cavich
10
11
12

evening

M. Cavich
M. Arcade

MONDAY JULY 8 thru SUNDAY JULY 14

Thursday July 11 192/173

8 ATF - Davidson
9 #9-8 - refusal No w.T.
#3 - moved 100' E.
10 #6 - inaccessable
5 AB = 7'6"
11 .25' water
12

Stafford St. Joe Dicarlo Charleton,

(fill to 8'-7' native from 7'-10')

evening

Friday July 12 193/172

8 #4 - refusal @ 5', w.T. @ 4.5
#7 m-c. sand w/ weathered asphalt. set @ 12'
9 m-c. to 10.5, 10.5 + 5, m-c, gravely till., WT @ 8.9"
#10
10
#1, fill asphalt, m-c sd. 0-8'; 8'-10' silty f-c gravel till, w.T @ 5.5'
11 #2 0'-7' fill f-m sand, 7'-9.5' till m-c S, g
12

W.T 5.0
set 9.5

evening

Saturday July 13 194/171

CAPE COD

Sunday July 14 195/170

AT A GLANCE®

Discussion on Pit

7/8/85 meeting
w/ ATFD, CEH, DEQE

- concrete the tails race way

  - these numbers do not send up a red flag to stop activites

  - Anxious to start immediately

  - Dan will bring and phone rest of sample results we will then form letter w/ J.D's approval.

meeting

12 soil Samples - Pit

		ppm (@ Total Hg)	
#1	3'	0.14	@ 3' Test Pit
			oil <0.05
#2	3'	0.14	
~~#~~			~~water~~ ~~<0.05~~
#3	4'	0.28	Water phase <0.0010
#4	5'	0.24	
#5	4'	0.34	~~Tail Race~~
#6	3'	0.34	Tail Race : 0.0068 (liquid)
#7	2'	~~<~~0.1 *	
#8	5'	.70	
#9	4'	.52	
#10	2'	.30	
#11	5'	.20	
#12	5'	1.3 *	

* - rechecking

WHITE CONSOLIDATED INDUSTRIES, INC.
CLEVELAND, OHIO 44111

EXECUTIVE OFFICES

RICHARD E. HILL, P.E.
ENVIRONMENTAL ENGINEER

RECEIVED
JUL 3 1985
Div. Solid/Hazardous Waste

July 1, 1985

VIA CERTIFIED MAIL

Ms. Susan Corderman
Division of Hazardous Waste
The Commonwealth of Massachusetts
Department of Environmental Quality Engineering
Central Region
75 Grove Street, Box 13
Worcester, Massachusetts 01605

Dear Susan:

Enclosed you will find a site assessment program for the Sidney Covich property in Whitinsville.

I trust this reaches you in good time so that we may discuss it at our July 8th meeting.

Very truly yours,

Richard E. Hill

Richard E. Hill

/ecc
Attachment

cc: S. Covich
D. Marques

WHITE CONSOLIDATED INDUSTRIES, INC.
CLEVELAND, OHIO 44111

EXECUTIVE OFFICES

RICHARD E. HILL, P.E.
ENVIRONMENTAL ENGINEER

RECEIVED
JUN 14 1985
Div. Solid/Hazardous Waste

June 13, 1985

VIA EMERY OVERNIGHT MAIL

Ms. Susan Corderman
Division of Hazardous Waste
The Commonwealth of Massachusetts
Department of Environmental Quality Engineering
Central Region
75 Grove Street, Box 13
Worcester, Massachusetts 01605

Dear Susan:

White Consolidated Industries, Inc. submits for your review and approval, a plan for the containment and removal of oil in the area of building #9 of the Sidney Covich property.

With respect to mercury contamination, Dan Marques will deliver the results of metal analyses to your office on June 17, 1985. Your prompt review of the sampling results and any recommendations for further sampling will allow us to have these samples collected on Wednesday, June 19, 1985.

We anticipate being able to propose an overall site evaluation plan of the Covich property by July 8, 1985.

After you have reviewed this please call me at 216/252-3700.

Very truly yours,

Rich Hill

Richard E. Hill

/ecc
cc: D. Marques
M. F. Eichler
S. Covich

WHITE CONSOLIDATED INDUSTRIES, INC.
CLEVELAND, OHIO 44111

RECEIVED
JUN 14 1985
Div. Solid/Hazardous Waste

EXECUTIVE OFFICES

RICHARD E. HILL, P.E.
ENVIRONMENTAL ENGINEER

June 13, 1985

VIA EMERY OVERNIGHT MAIL

Ms. Susan Corderman
Division of Hazardous Waste
The Commonwealth of Massachusetts
Department of Environmental Quality Engineering
Central Region
75 Grove Street, Box 13
Worcester, Massachusetts 01605

Dear Susan:

With respect to our proposal dated May 17, 1985 relative to hydrogeological evaluation of the landfill, you raised certain questions which we believe to have been satisfactorily answered by Matthew Eichler's letter to you of June 3, 1985 (copy attached).

This is to confirm our understanding that our plans are approved by your agency. This being the case, the work is scheduled to commence on July 8, 1985.

I would appreciate it if you could meet with me at the landfill site at 1:30 p.m. on July 8th, 1985 to review the status on all projects of our mutual interest.

Very truly yours,

Rich Hill

Richard E. Hill

/ecc
Attachment

cc: D. Marques
M. F. Eichler

CEH Caswell, Eichler and Hill, Inc.
GEOLOGY HYDROLOGY GEOPHYSICS
P.O. Box 4696
Portsmouth, NH 03801
TEL. (603) 431-4899

June 3, 1985

RECEIVED
JUN 11 1985
Div. Solid/Hazardous Waste

Ms. Susan Corderman
Massahcusetts DEQE - DSHW
75 Grove Street
Worcester, MA 01605

Re: ATF/Davidson and Sidney Covitch Properties (Formerly AFT/Davidson), Whitinsville, Massachusetts

Site Assessment for the Massachusetts DEQE Phases I & II - Site Investigation/Remedial Action Guidelines

a) Hydrogeologic Site Assessment
b) Monitoring Well Installation

Written Response to Work Plan Comments as Discussed in 5-30-85 Telephone Conversation

Dear Ms. Corderman:

The purpose of this letter is to provide the DEQE - DSHW with a written response to the seven items we discussed on the telephone regarding the above referenced work plan. The items are as follows:

1. We will be gathering split-spoon samples during the monitoring well construction phase of the project. continuous?

2. We will take one boring to refusal on both properties

3. The specificity with which we described our boring and well construction work was not meant to preclude other judgements being made in the field. The detail was, rather, meant to give a detailed description of our general approach should field conditions exist as described. We will, however, set a screen at the water table in all cases as discussed in our telephone conversation.

4. We will be providing a water table map,and plume delineation map should contamination be detected.

5. The laboratory (Resource Analysts, Inc.) will be conducting the sampling as described in Attachment E of our submitted Work Plan.

6. We will survey the monitoring wells for vertical and horizontal control to an arbitrary datum, or a U.S.G.S. datum should one be conveniently located.

7. We plan to use a background monitoring well completed near the ATF/ Davidson and Covitch property line as a background well for both investigations.

Should you have any further comments, please call.

Very truly yours,
CASWELL, EICHLER AND HILL, INC.

Matthew F. Eichler
Principal

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JUN 11 1985
Div. Solid/Hazardous Waste

MFE/SKK

cc: R. Hill
D. Marques

CEH Caswell, Eichler and Hill, Inc.
GEOLOGY HYDROLOGY GEOPHYSICS
P.O. Box 4696
Portsmouth, NH 03801
TEL. (603) 431-4899

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JUN 14 1985
Div. Solid/Hazardous Waste

May 30, 1985

RECEIVED
JUN 12 1985
WCI

Mr. Richard Hill, P.E.
White Consolidated Industries
11770 Berea Road
Cleveland, Ohio 44111

Re: Auger Investigation of Oil and Mercury Contamination Area

Dear Rich:

We have completed the auger probe investigation of the oil and mercury contamination area adjacent to Building 9 and the raceway on the Covitch property. As the attached schematic shows, seven probes (AP-1 through AP-7) were advanced to a depth of fifteen feet below land surface. In this fashion, we were able to observe the nature of both the subsurface stratigraphy and contamination above and below the water table. The water table was observed to exist at ten feet below land surface adjacent to Building 9, and twelve feet below land surface adjacent to the raceway.

In vertical section, the probes showed the area to consist of two to three feet of gravel and crushed stone (fill) overlying twelve to thirteen feet of silty, clayey fine/medium/coarse sand and gravel, and occasional cobbles. This is commonly known as glacial till. The upper fill was permeated with dark oil of the variety that was commonly used to create a roadbed. The glacial till showed some evidence of oil contamination above the water table where more permeable layers have allowed for preferential horizontal permeability. The zone existing from several feet above the water table to below the water table showed evidence of oil contamination best characterized as saturated. It is assumed that the natural fluctuation of the water table over the years is responsible for the observed thickness of the zone of oil saturation.

Horizontally, the till matrix at AP-1 and AP-2 contained a lesser percentage of fines than did the other probes. The silty, clayey nature of the overburden generally increased in the direction of AP-5, the matrix of which exhibited the greatest percentage of fines.

At the conclusion of the field investigation, the results were discussed with Dan Marques. At that time he expressed a desire to construct a cut-off trench along the wall of the small building attached to Building 9 where AP-1 was completed. The trench would be excavated to several feet below the existing water table, and gently sloped toward AP-1 where a sump and oil separation

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Div. Solid/Hazardous Waste

unit would be located. The trench would be lined with concrete and the entire face of the raceway and trench along the small building wall would be sealed and grouted as is customary in the construction of a swimming pool wall. The trench would then be backfilled with coarse sand and gravel. In this fashion, given the coarser nature of the native material in the vicinity of AP-1 and AP-2, the area's water table could be depressed and flow would be directed toward the sump. The oil would be removed from the influent, and the effluent water could be recirculated to drainage tiles placed along the foundation of Building 9. This would insure the hydraulic gradient and flushing action necessary to keep the system operational.

Dan requested an estimate of how much influent could be expected to enter the sump. Given an estimated hydraulic gradient of 0.25 ft/ft, an estimated in-situ permeability of 3.3×10^{-7} ft/sec. and a seepage face area of 370 ft^2, the influent rate should approximate 1800 gallons per day, or slightly more than 1 gallon per minute. The amount of oil that can be separated from this groundwater discharge is indeterminate at this time.

Several factors are important to note in the design stage of the separation system:

> A backhoe with approximately an 18 foot reach will be required for construction of the cut-off trench, and constant dewatering will be required.
>
> The entire area of excavation should be paved to prevent infiltration of precipitation.
>
> A subsurface sump inside a "man hole" is envisioned, and therefore, crushed stone should be used to backfill the trenches in the vicinity of the sump. The retaining mesh that will line the sump should be selected, therefore, to contain the thirtieth percentile (d_{30}) diameter of crushed stone employed.
>
> In that field estimates have been used in the calculations contained herein, and some variability exists in the nature of the subsurface stratigraphy, system monitoring and adjustment will undoubtedly be required.

We understand that mercury was detected in the oil samples collected by IPC, Inc. during their clean-up work at the site. We would recommend the collection of soil samples in several locations between Building 9 and the raceway, and subsequent analysis for mercury. This testing will give us an idea of the extent of contamination, and the work can be completed during the planned monitoring well installation at the Covitch site. We would advance hollow stem augers to the water table where oil contamination was noted, and take split-spoon soil samples.

Should you have any questions or further informational needs regarding this letter, please call.

Very truly yours,
CASWELL, EICHLER AND HILL, INC.

Matthew F. Eichler III
Principal

cc: D. Marques

MFE/SKK

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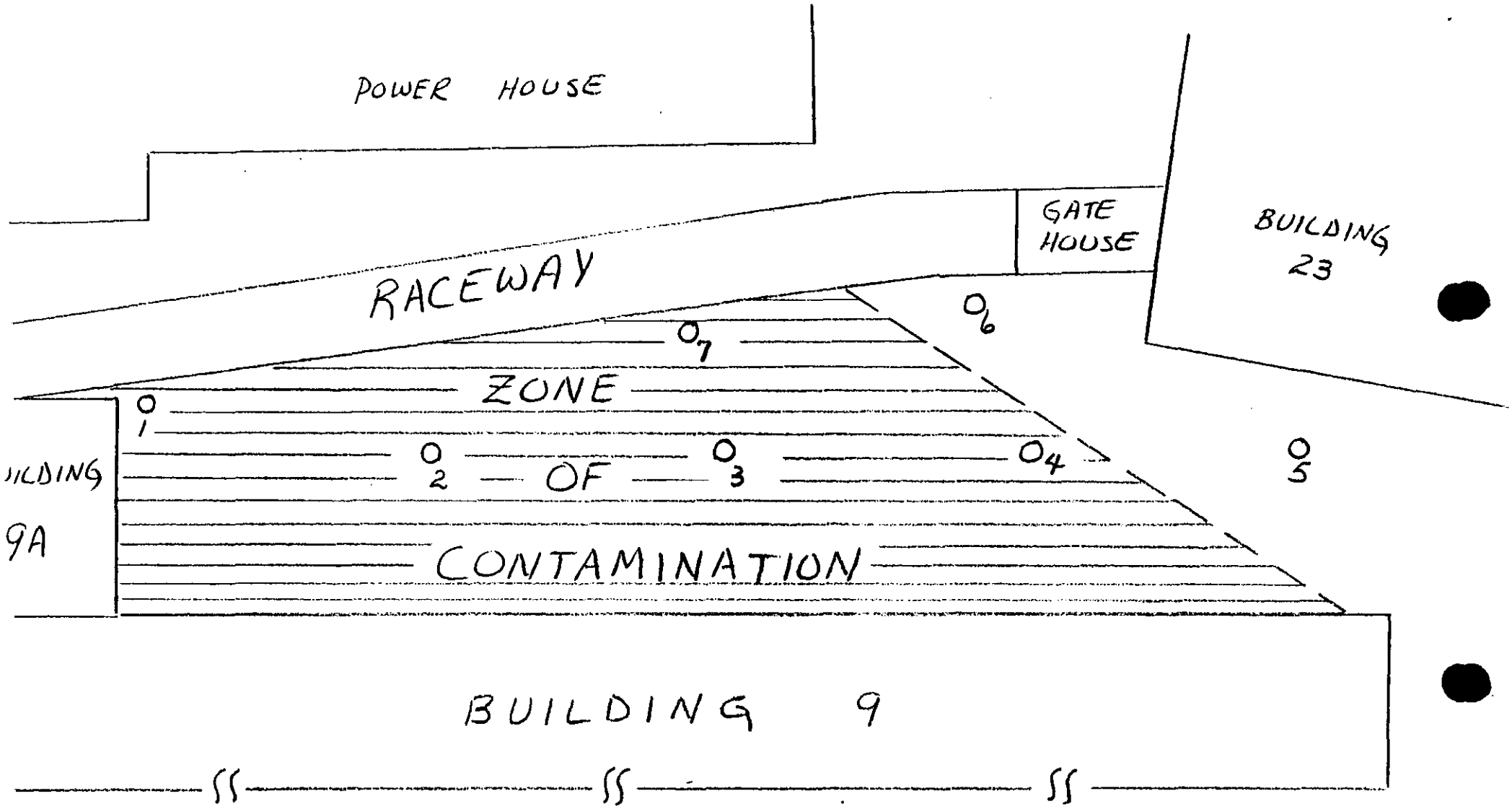
JUN 14 1985
Div. Solid/Hazardous Waste



APPROXIMATE SCALE : 1" = 25'

O_7 = AUGER PROBE

CEH 5-85

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JUN 14 1985
Div. Solid/Hazardous Waste

ATF Davidson 5/29/85

8-9 holes to below water table

defined plume based on floating product

dug trench along raceway below wt - put 3" cement wall on raceway

pitch trench & collect w/oil/water separator

fill trench w/sand

pump & collecting well will be in manhole

1/4" oil on water in the hole

5/24/85

Richard Hill said that soil samples from the pit showed 1-5 ppm mercury - they will now sample stuff from raceway for mercury.

CEH Caswell, Eichler and Hill, Inc.
GEOLOGISTS AND HYDROLOGISTS
P.O. Box 4696
Portsmouth, N.H. 03801
Tel. 207-439-4853

May 24, 1985

RECEIVED
JUL 3 1985
Div. Solid/Hazardous Waste

Mr. Richard Hill, P.E.
White Consolidated Industries, Inc.
11770 Berea Road
Cleveland, Ohio 44111

Re: Sidney Covitch Properties (Formerly ATF/Davidson Properties)
Whitinsville, Massachusetts.

Site Assessment for the Massachusetts DEQE Phases I & II -
Site Remedial Action Guidelines

a) Hydrogeologic Site Assessment
b) Monitoring Well Installation
c) Ground Water Sampling and Analysis

Dear Rich:

The purpose of this letter is to outline for you and the DEQE those investigations that we recommend to evaluate the present ground water beneath the above referenced properties which abut the Mumford River. Additionally, we will evaluate the ground water quality adjacent to a former coal ash disposal area across the river from the referenced facilities.

As the enclosed site map shows, the construction of fifteen permanent monitoring wells are recommended. Drilling, well construction,sampling/laboratory methodologies and data analyses are anticipated to parallel those previously outlined in our work plan for the AFT/Davidson facility that abuts the Covitch property. We recommend that the Covitch work be completed concurrently with the AFT/Davidson investigation to insure driller availability, eliminate double mobilization charges, and cause the least amount of impact on the overall schedule.

This letter and attachments should serve as your work plan submittal to the DEQE. Upon receipt of their comments or approval, we will ammend the scope if necessary and arrange for contractor mobilization.

Please call if you have any questions or further needs.

Very truly yours,
CASWELL, EICHLER AND HILL, INC.

Matthew F. Eichler III
Principal

RECEIVED
JUN 26 1985
WCI

MFE/SKK
cc: D. Marques

John

C. M. A. P. C. D.

MAY 24 1985

RECEIVED

LANE & ALTMAN

ATTORNEYS AT LAW

201 DEVONSHIRE STREET

BOSTON, MASSACHUSETTS 02110

NEWTON A. LANE
ARTHUR D. ALTMAN
BERNARD N. BORMAN
NATHAN T. WOLK
DONALD M. BLOCH
ROBERT M. ROSEN
DAVID L. ROKOFF
FRANK D. ARONSON
LAWRENCE M. SLATER
ARTHUR D. GOLD
BARRY M. RICH
GREGORY J. ENGLUND
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SAMUEL M. SHAFNER
PETER A. JOHNSON
A. MIRIAM JAFFE
ROBERT S. BURSTEIN
MARY E. VALLE
MARC C. LAREDO

EDWARD A. NATHANSON
1916-1955

HYMAN H. RUDOFSKY
1927-1979

TELEPHONE (617) 357-5200

May 23, 1985

Mr. Edmond G. Benoit
Deputy Regional Environmental Engineer
Department of Environmental Quality
Engineering
Central Region
75 Grove Street
Worcester, Massachusetts 01605

Re: Alleged Oil/Hazardous Material
Main Street, Northbridge, Massachusetts

Dear Mr. Benoit:

In response to your letter of April 30, 1985, please be advised that this law firm represents Mr. Sidney Covich as he is Trustee of Whitinsville Redevelopment Corp., the record owner who has informed you orally that he will accept responsibility for the aforementioned release/threat of release of oil/hazardous material, to the extent that his recent ownership would subject him thereto under Chapter 21E. Please be advised that Mr. Covich purchased this property on October, 1984 and that his predecessor in title, White Consolidated Industries, Inc., has an Indemnity Agreement indemnifying our client for any hazardous waste or material pursuant to M.C.L. c. 21E. As you know, our client has attended a D.E.Q.E. hearing on May 3 and has hired a consultant to prepare an appropriate clean-up plan.

We also wish to point out that it has been our client who has brought this matter to the State's attention and who has fully cooperated with the D.E.Q.E. It is our hope

that this matter may be handled expeditiously and handled on the administrative level. If you have any questions, please do not hesitate to contact me.

Very truly yours,

Benjamin W. Moulton

BWM:kam

WHITE CONSOLIDATED INDUSTRIES, INC.
CLEVELAND, OHIO 44111

EXECUTIVE OFFICES

RICHARD E. HILL, P.E.
ENVIRONMENTAL ENGINEER

May 20, 1985

Ms. Susan Corderman
Massachusetts Department of
Environmental Quality Engineering
75 Grove Street - Box 13
Worchester, Massachusetts 01605

CEIVED
AY 23 1985
Solid/Hazardous Was

Dear Susan:

This letter is to confirm the understandings reached between ATF/Davidson and your Agency during your inspection of the property owned by Sidney Covich, which we are cleaning up. We understand that your Agency has found the clean up (removal) actions relative to the oil in the raceway adequate for the present time. As such, we have determined that project to be complete for the present time and dismissed the clean up contractor (Inland Pollution Control).

Secondly, we dug a hole in the pit area to determine the presence of oil contamination at the water table. As you saw, oil and water accumulated in the bottom of the pit. We sucked this oil and the pit did not refill with water during the time we were present.

We indicated at the time that we were planning to bring in an auger so that we could drill test holes at a number of spots in the general area of the pit in order to determine the extent of the oil contamination. This exploration is scheduled for May 28th and 29th.

Further, we showed you a map of the facility with preliminary observation well sites marked.

After your Agency has approved my submission to you dated May 7, 1985 we will formally submit a plan of the overall site study of the Covich property.

Sincerely,

Richard Hill

Richard E. Hill

/ecc

WHITE CONSOLIDATED INDUSTRIES, INC.
CLEVELAND, OHIO 44111

EXECUTIVE OFFICES

RICHARD E. HILL, P.E.
ENVIRONMENTAL ENGINEER

May 7, 1985 CERTIFIED MAIL

Ms. Susan Corderman
Massachusetts Department
of Environmental Quality Engineering
75 Grove Street
Box 13
Worchester, MA 01605

Dear Susan:

In accordance with my letter to John Desmond of March 14, 1985, I am submitting to your agency a proposal for hydrogeological investigation of the ATF/Davidson landfill site in Whitinsville.

After you have had a chance to review this, I will call to arrange a meeting to finalize our plans on this matter with your agency.

Sincerely,

Richard E. Hill

Richard E. Hill

/ecc
Enclosures

RECEIVED
MAY 10 1985
Div. Solid/Hazardous Waste

ATF/Davidson / Covich / MA DEQE Meeting
5/3/85 9:00 am

Phone #			
216 252 3700	Richard Hill	Env. Eng.	White Consolidated
623 431 4899	Matt Eichler	Hydrogeologist	Cosnell Eichler & Hill, Inc.
	Marc Laredo	attorney	Lane & Altman
234 7451	Leonardo Solles		The Shops at Whitinsville
234 7451	Sidney Covich		Sidney Covich
234 7451	Spaulding R. Aldrich		Northbridge
792-7653	Susan Corderman	DEQE-DSHW	
234-7451	DANIEL MARQUES		A.T.F. DAVIDSON Co.
792-7653	Frank Sciannameo	(IR) DEQE	
792-7653	John Desmond	DEQE-DSHW	
234-6680	Marianne Bergenholtz	Northbridge Board of Health	
234-3102	Don Laliberty	Northbridge	

ATF-DAVIDSON COMPANY

MAIN STREET
WHITINSVILLE, MASSACHUSETTS 01588
(617) 234-7451 TELEX 928-429

ID
DH
SC

May 1, 1985

C.M.A.P.C.D.

MAY 3 1985

RECEIVED

Mr. Edmond G. Benoit
Deputy Regional Environmental Engineer
The Commonwealth of Massachusetts
Dept. of Environmental Quality Engineering
75 Grove Street
Worcester, Mass. 01605

Re: WRITTEN NOTICE OF RESPONSIBILITY

Dear Mr. Benoit:

Your notice relative to the former ATF-Davidson facility, Main Street, Whitinsville, Massachusetts, dated 4-30-85, was addressed to me. Please be advised that on October 23, 1984 the facility in question was conveyed to Mr. Sidney Covich. Any correspondence relating to that property should be mailed to:

Mr. Sidney Covich
Main Street
Whitinsville, Mass. 01588

Also, any future correspondence relating to property owned by ATF-Davidson Company, Division of White Consolidated Industries, Inc., should be mailed to:

WHITE CONSOLIDATED INDUSTRIES, INC.
11770 Berea Road
Cleveland, Ohio 44111
Attention: Mr. Richard Hill

Very truly yours,
ATF-DAVIDSON COMPANY

Philip M. Whitney
Vice President, Finance

PMW:hd

cc: Spaulding R. Aldrich, LHWC
Northbridge Conservation Commission
Northbridge Board of Health
James Coleman, DEQE, Boston
Daniel Glanz, EPA
Stephen DeGabriele, DEQE, Boston

Source

The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

Department of Environmental Quality Engineering

Central Region

75 Grove Street, Worcester, Massachusetts 01605

792-7653

April 30, 1985

Philip Whitney
A.T.F. Davidson
Main Street
Whitinsville, Massachusetts 01588

Re: Oil/Hazardous Material Release/Threat of Release At Main Street, Northbridge, Massachusetts

WRITTEN NOTICE OF RESPONSIBILITY

Dear Mr. Whitney:

As a result of an investigation conducted by the Department of Environmental Quality Engineering (DEQE) on April 24, 1985, the Department has determined that there is/has been a release/threat of release of oil/hazardous material including waste oil and mercury, at the former A.T.F. Davidson facility, Main Street, Whitinsville, Massachusetts.

This determination is based on the following information obtained during the site investigation:

1) Test pit excavations, along and adjacent to the south side of building #9, contained oil and oil contaminated soils; (In addition one of the test pits contained a small unknown quantity of mercury metal.)

2) That a water channel (raceway) transports water from Whitin Pond travels beneath the facility and empties into the Mumford River; (The raceway was used, in prior years, to produce hydroelectric power at the facility and is equipped with a number of water gate locks to control water flow.)

3) That the waters of the raceway located down gradient from the power plant (boiler room) at the gate lock in building #9 contained a large accumulation of unknown quantity of oil;

4) That the open drainage culvert located in base floor of the power plant contained an accumulation of unknown quantity of oil/water mixture;

5) That the raceway is/has discharged oil to the waters of the Mumford River for an unknown period of time;

6) That a heavy petroleum odor exists in the buildings and area adjacent to where oil has accumulated; and

7) That there are numerous locations at the facility where oil/hazardous materials are deposited or stored in containers at various stages of deterioration.

Such incident is governed by Chapter 21E of the General Laws of Massachusetts (hereinafter "M.G.L.c.21E"), the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, which was enacted on March 24, 1983, through Section 5 of Chapter 7 of the Acts and Resolves of Massachusetts of 1983.

The Department has determined that you are, under the provisions of M.G.L.c.21E, §5(a), responsible for the occurrence of such release/threat of release. This letter is intended to (1) inform you, in writing, of the Department's determination that you are responsible for such release/threat of release; (2) provide you an opportunity immediately to accept such responsibility, and (3) advise you of the potential consequences of your failure to accept such responsibility.

Your acceptance of responsibility for such release/threat of release means that you will (1) enter into a contract with a consultant knowledgeable in hazardous waste site assessment, approved by the Department, to take any necessary remedial and/or preventive response actions (i.e. assessment, containment and/or removal actions) relative to such release/threat of release and (2) pay for (a) all response costs incurred by the Department due to such release/threat of release and (b) all damages sustained from any injury to or destruction or loss of natural resources due to such release/threat of release.

If you fail to accept responsibility for such release/threat of release, the Department will, pursuant to M.G.L.c.21E, §4, take or arrange for any necessary response actions relative thereto, and the Commissioner of the Department will, pursuant to M.G.L.c.21E, §11, request the Attorney General of the Commonwealth of Massachusetts to bring a civil and/or criminal action against you under M.G.L.c.21E. Specifically, the statute subjects any person who is responsible for a release/threat of release of oil/hazardous material to the following civil liability and penalties and criminal fines and sanctions:

(1) civil liability for (a) all response costs incurred by the Department due to such a release/threat of release and (b) all damages for any injury to or destruction or loss of natural resources due to such a release/threat of release. Such liability is imposed jointly and severally, and without regard to fault, upon any person who is responsible for such a release/threat of release (M.G.L.c.21E, §5(a)); and

(2) civil liability for up to three (3) times the amount of civil liability for costs and damages as described in paragraph (1) above. Such treble liability is imposed jointly and severally upon any person who is responsible for such a release/threat of release (M.G.L.c.21E, §5(e)); and

(3) a civil penalty of not more than twenty-five thousand dollars ($25,000.00) for each violation of M.G.L.c.21E or any ORDER issued or regulation adopted thereunder (M.G.L.c.21E, § 11); and/or

(4) a criminal fine of not more than twenty-five thousand dollars ($25,000.00) and/or imprisonment for not more than five (5) years for each such violation (M.G.L.c.21E, §11). Each day such violation occurs or continues constitutes a separate violation (M.G.L.c.21E, §11).

The Department advises you to accept responsibility for the aforementioned release/threat of release of oil/hazardous material and, thereby, avoid the financial consequences resulting from a successful legal action brought against you under M.G.L.c.21E by the Commonwealth of Massachusetts.

Your acceptance of responsibility must include the following at a minimum:

1) By May 3, 1985, the engaging of a consultant knowledgeable in assessing potential hazardous waste/material sites.

2) Attendance at a meeting on May 3, 1985, at 9:00 a.m. in the Central Region DEQE office, to discuss proposed site assessment and clean-up and to establish an acceptable schedule of implementation of this work.

3) To conduct, in a timely manner, whatever investigations, sampling, and remedial measures that are deemed appropriate by the Department to prevent a further release or threat of release at said site.

4) Your acknowledgement and acceptance of these responsibilities within five (5) days of your receipt of this letter.

A copy of the text of M.G.L.c.21E is available, upon written request, from the Bookstore, Room 116, State House, Boston, Massachusetts 02133.

Very truly yours,

Edmond G. Benoit
Deputy Regional Environmental Engineer

EGB/SHC/jc

cc: Spaulding R. Aldrich, LHWC
Northbridge Conservation Commission
Northbridge Board of Health
James Coleman, DEQE, Boston
Daniel Glanz, EPA
Stephen DeGabriele, DEQE, Boston

Source

The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

Department of Environmental Quality Engineering

Central Region

75 Grove Street, Worcester, Massachusetts 01605

792-7653

April 30, 1985

Sidney Covich
Main Street
Whitinsville, Massachusetts 01588

Re: Oil/Hazardous Material Release/Threat of Release at Main Street, Northbridge, Massachustts 01588

WRITTEN NOTICE OF RESPONSIBILITY

Dear Mr. Covich:

As a result of an investigation conducted by the Department of Environmental Quality Engineering (DEQE) on April 24, 1985, the Department has determined that there is/has been a release/threat of release of oil/hazardous material including waste oil and mercury, at the former A.T.F. Davidson facility, Main Street, Whitinsville, Massachusetts.

This determination is based on the following information obtained during the site investigation:

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2) That a water channel (raceway) transports water from Whitin Pond travels beneath the facility and empties into the Mumford River; (The raceway was used, in prior years, to produce hydroelectric power at the facility and is equipped with a number of water gate locks to control water flow.)

3) That the waters of the raceway located down gradient from the power plant (boiler room) at the gate lock in building #9 contained a large accumulation of unknown quantity of oil;

4) That the open drainage culvert located in base floor of the power plant contained an accumulation of unknown quantity of oil/water mixture;

5) That the raceway is/has discharged oil to the waters of the Mumford River for an unknown period of time;

6) That a heavy petroleum odor exists in the buildings and area adjacent to where oil has accumulated; and

7) That there are numerous locations at the facility where oil/hazardous materials are deposited or stored in containers at various stages of deterioration.

Such incident is governed by Chapter 21E of the General Laws of Massachusetts (hereinafter "M.G.L.c.21E"), the Massachusetts Oil and Hazardous Material Release Prevention and Response Act, which was enacted on March 24, 1983, through Section 5 of Chapter 7 of the Acts and Resolves of Massachusetts of 1983.

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Your acceptance of responsibility for such release/threat of release means that you will (1) enter into a contract with a consultant knowledgeable in hazardous waste site assessment, approved by the Department, to take any necessary remedial and/or preventive response actions (i.e. assessment, containment and/or removal actions) relative to such release/threat of release and (2) pay for (a) all response costs incurred by the Department due to such release/threat of release and (b) all damages sustained from any injury to or destruction or loss of natural resources due to such release/threat of release.

If you fail to accept responsibility for such release/threat of release, the Department will, pursuant to M.G.L.c.21E, §4, take or arrange for any necessary response actions relative thereto, and the Commissioner of the Department will, pursuant to M.G.L.c.21E, §11, request the Attorney General of the Commonwealth of Massachusetts to bring a civil and/or criminal action against you under M.G.L.c.21E. Specifically, the statute subjects any person who is responsible for a release/threat of release of oil/hazardous material to the following civil liability and penalties and criminal fines and sanctions:

(1) civil liability for (a) all response costs incurred by the Department due to such a release/threat of release and (b) all damages for any injury to or destruction or loss of natural resources due to such a release/threat of release. Such liability is imposed jointly and severally, and without regard to fault, upon any person who is responsible for such a release/threat of release (M.G.L.c.21E, §5(a)); and

(2) civil liability for up to three (3) times the amount of civil liability for costs and damages as described in paragraph (1) above. Such treble liability is imposed jointly and severally upon any person who is responsible for such a release/threat of release (M.G.L.c.21E, §5(e)); and

(3) a civil penalty of not more than twenty-five thousand dollars ($25,000.00) for each violation of M.G.L.c.21E or any ORDER issued or regulation adopted thereunder (M.G.L.c.21E, §11); and/or

(4) a criminal fine of not more than twenty-five thousand dollars ($25,000.00) and/or imprisonment for not more than five (5) years for each such violation (M.G.L.c.21E, §11). Each day such violation occurs or continues constitutes a separate violation (M.G.L.c.21E, §11).

The Department advises you to accept responsibility for the aforementioned release/threat of release of oil/hazardous material and, thereby, avoid the financial consequences resulting from a successful legal action brought against you under M.G.L.c.21E by the Commonwealth of Massachusetts.

Your acceptance of responsibility must include the following at a minimum:

1) By May 3, 1985, the engaging of a consultant knowledgeable in assessing potential hazardous waste/material sites.

2) Attendance at a meeting on May 3, 1985, at 9:00 a.m. in the Central Region DEQE office, to discuss proposed site assessment and clean-up and to establish an acceptable schedule of implementation of this work.

3) To conduct, in a timely manner, whatever investigations, sampling, and remedial measures that are deemed appropriate by the Department to prevent a further release or threat of release at said site.

4) Your acknowledgement and acceptance of these responsibilities within five (5) days of your receipt of this letter.

A copy of the text of M.G.L.c.21E is available, upon written request, from the Bookstore, Room 116, State House, Boston, Massachusetts 02133.

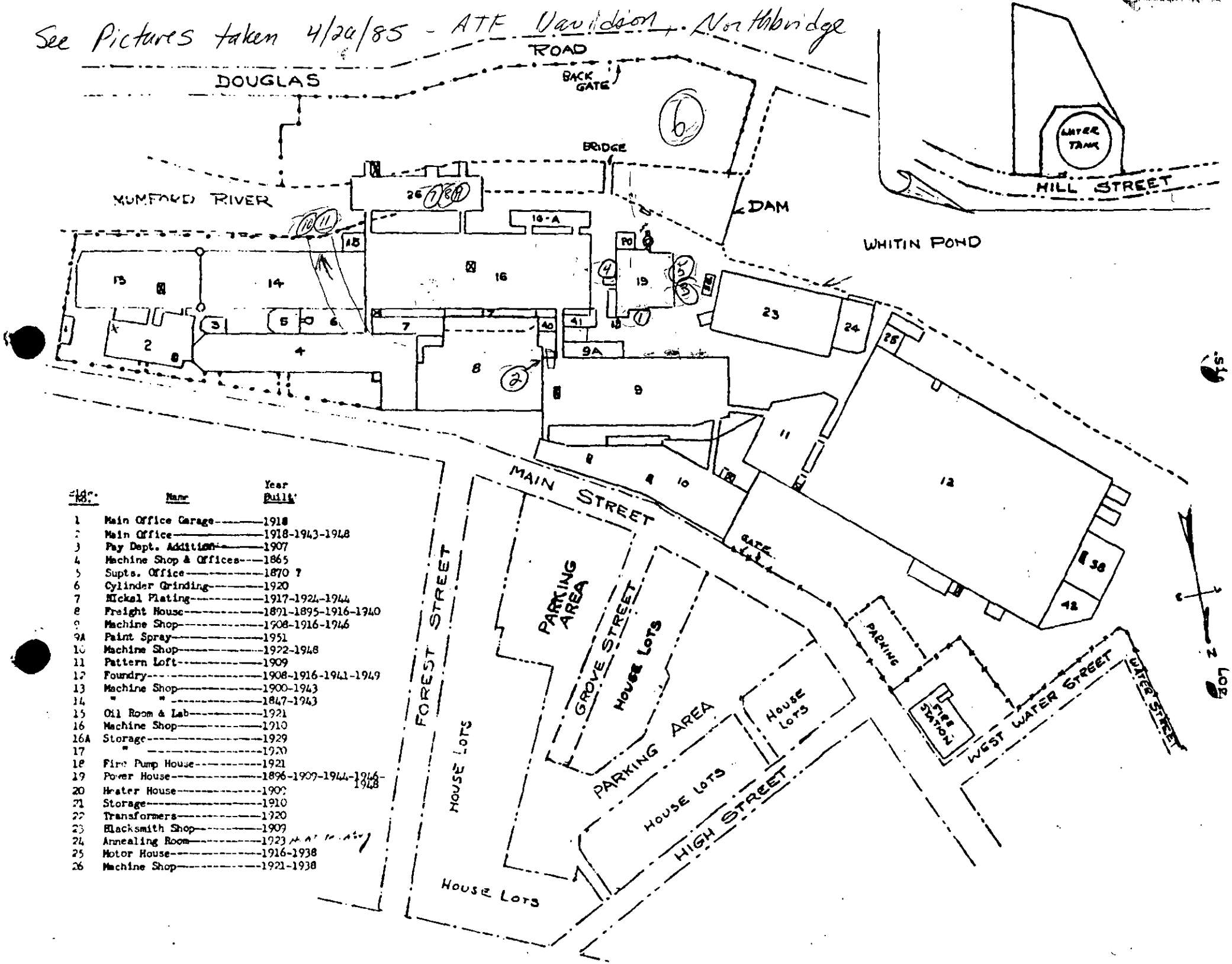
Very truly yours,

Edmond G. Benoit
Deputy Regional Environmental Engineer

EGB/SHC/jc

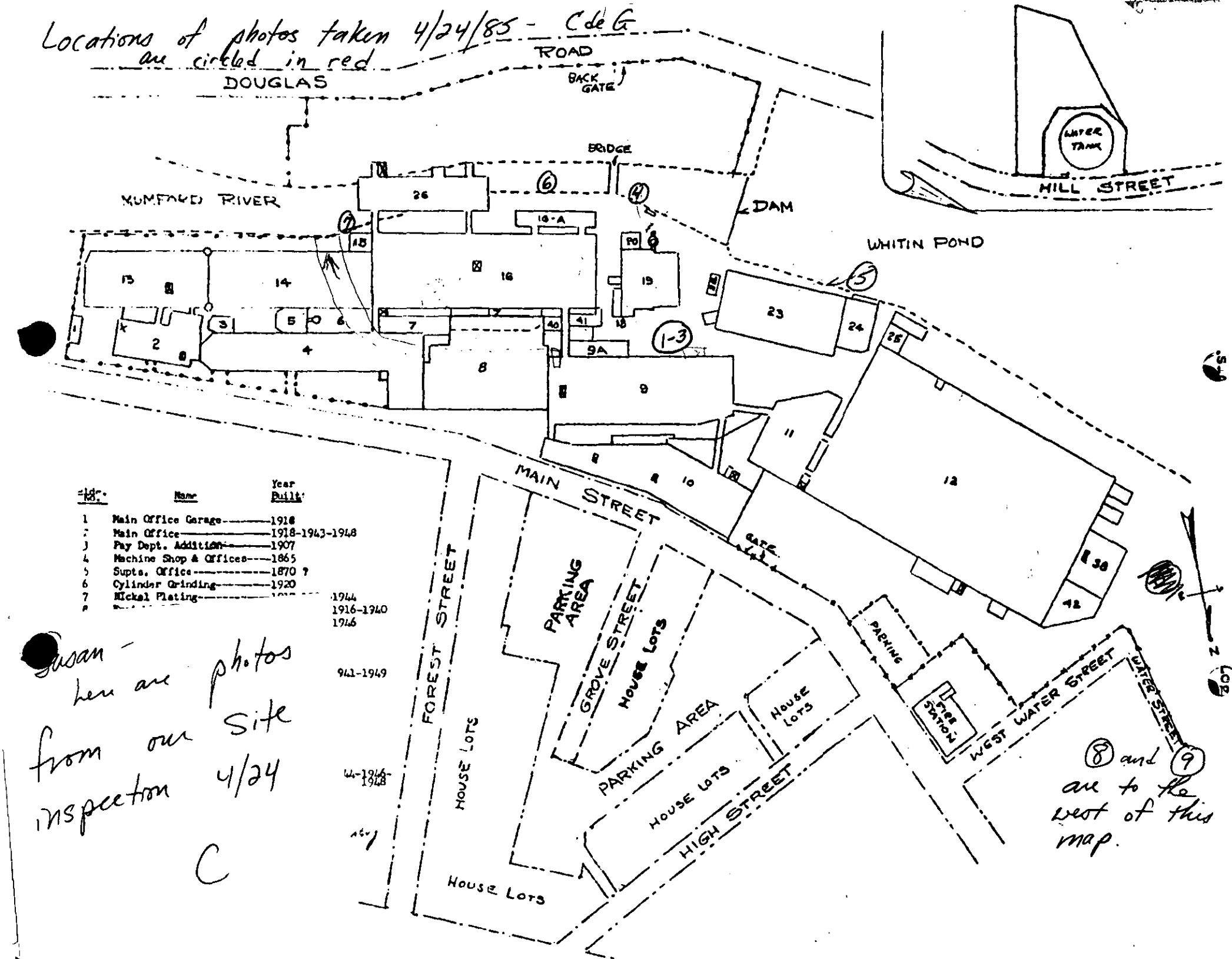
cc: Spaulding R. Aldrich, LHWC
Northbridge Conservation Commission
Northbridge Board of Health
James Coleman, DEQE, Boston
Daniel Glanz, EPA
Stephen DeGabriele, DEQE, Boston

See Pictures taken 4/24/85 - ATF Davidson + Northbridge



Bldg. No.	Name	Year Built
1	Main Office Garage	1918
2	Main Office	1918-1943-1948
3	Pay Dept. Addition	1907
4	Machine Shop & Offices	1865
5	Supts. Office	1870 ?
6	Cylinder Grinding	1920
7	Nickel Plating	1917-1924-1944
8	Freight House	1891-1895-1916-1940
9	Machine Shop	1908-1916-1946
9A	Paint Spray	1951
10	Machine Shop	1922-1948
11	Pattern Loft	1909
12	Foundry	1908-1916-1941-1949
13	Machine Shop	1900-1943
14	" "	1847-1943
15	Oil Room & Lab	1921
16	Machine Shop	1910
16A	Storage	1929
17	"	1920
18	Fire Pump House	1921
19	Power House	1896-1909-1944-1946-1948
20	Heater House	1900
21	Storage	1910
22	Transformers	1920
23	Blacksmith Shop	1909
24	Annealing Room	1923
25	Motor House	1916-1938
26	Machine Shop	1921-1938

Locations of photos taken 4/24/85 - C de G
are circled in red



Bldg. No.	Name	Year Built
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5	Supts. Office	1870 ?
6	Cylinder Grinding	1920
7	Nickel Plating	[illegible]
8	[illegible]	1944
		1916-1940
		1946
		941-1949
		44-1946-1948

Susan -
here are photos
from our site
inspection 4/24

C

WHITE CONSOLIDATED INDUSTRIES, INC.
CLEVELAND, OHIO 44111

RECEIVED
MAR 21 1985
Div. Solid/Hazardous Waste

EXECUTIVE OFFICES

RICHARD E. HILL, P.E.
ENVIRONMENTAL ENGINEER

March 14, 1985

Mr. John A. Desmond
Division of Hazardous Waste
The Commonwealth of Massachusetts
Central Region
75 Grove Street, Box 13
Worcester, Massachusetts 01605

Dear Mr. Desmond:

This is to confirm my conversation with you today relative to a site assessment of the landfill located on our property in Whitinsville, Massachusetts operated under the name of ATF/Davidson Company.

We plan to hire the hydrogeological firm of Caswell, Eichler and Hill, Inc. of North Whitefield, Maine to evaluate both water and soil quality at the site. You should plan our our submission for your approval of a sampling and analysis program no later than May 13, 1985.

If you have any questions, please call me at 216/252-3700.

Sincerely,

Rick Hill

Richard E. Hill

/ecc

cc: Dr. W. Bradford Caswell

Susan

792-7653

The Commonwealth of Massachusetts

Executive Office of Environmental Affairs

Department of Environmental Quality Engineering

Central Region

75 Grove Street, Worcester, Massachusetts 01605

January 22, 1985

Mr. Daniel Marques
Facilities Manager
ATF - Davidson
Main Street
Whitinsville, Massachusetts 01588

Re: Northbridge, Massachusetts
ATF - Davidson
Former Landfill and
Surface Impoundment

Dear Mr. Marques:

The Central Region office of the Department of Environmental Quality Engineering has reviewed information provided by you concerning the ATF - Davidson facility (formerly Whitin Machine Works) in the Whitinsville section of Northbridge, Massachusetts.

We request that you attend a meeting on February 6, 1985, at 10:00 a.m., in our offices, to discuss the status of the former landfill and surface impoundment at this facility. Please bring any additional information you may have, as well as the results from downstream sampling in the Mumford River, if it was performed.

If you have any questions, please contact Susan Corderman at 792-7653.

Very truly yours,

John A. Desmond

John A. Desmond, Chief
Solid and Hazardous Materials

JAD/SHC/jc

ATF-DAVIDSON COMPANY

MAIN STREET
WHITINSVILLE, MASSACHUSETTS 01588
(617) 234-7451 TELEX 928-429

May 16, 1984

Jacob Edwards
State Waste Programs
U.S. EPA, Room 1903
JFK Federal Building
Boston, MA 02203

C. M. A. P. C. D.
MAY 21 1984
RECEIVED

Dear Mr. Edwards:

ATF-Davidson Company requests that its hazardous waste treatment facility permit be terminated for two reasons.

First, the permit application refers to treatment of electroplating wastewater. We filed the application as was required by the federal regulation for this wastewater treatment system. After we had filed, the rules were changed so that these types of facilities were covered only by the N.P.D.E.S. System. Because of this, we believe that we do not need a hazardous waste treatment permit for this operation.

Secondly, we had also filed for storage authority in our application. Our feeling was that as long as we needed a permit anyway, we should be able to collect our wastes into quantities that would fill a semi-truck trailer. Since our waste generation rate is so low, this would require more than 90 days. However, since we do not require a treatment permit and since the storage over 90 days requirements are so burdensome (relative to paperwork), we now feel that it is in our best interest to remove all waste within 90 days regardless of transportation premiums.

We are enclosing a statement which we believe terminates our permit application and interim status. If you have need for further information, please call me at (617)234-7451.

Very truly yours,

ATF-DAVIDSON COMPANY

Daniel Marques
Facilities & Energy Mgr.

/lk
attachment

cc: Nancy Wrenn
Division of Hazardous Waste
DEQE
1 Winter Street
Boston, MA 02108

DEQE Regional Office
Central Region
75B Grove Street
Worcester, MA 01605

C E R T I F I C A T I O N

I, Daniel Marques, Facilities & Energy Mgr., hereby
(name) (position)

certify that ATF-Davidson Co., MAD046128559, which
(name of company) (EPA I.D. #)

notified the U.S. Environmental Protection Agency ("EPA") that it treats, stores and/or disposes of hazardous waste, at all times from this date forward (1) will not accumulate any hazardous waste for more than 90 days; (2) will accumulate hazardous waste in compliance with 310 CMR 30.340; (3) will not store, treat, or dispose of hazardous waste; and (4) will comply with all other applicable requirements of 310 CMR 30.000.

I understand that the Department of Environmental Quality Engineering is deferring applicability of the financial responsibility requirements of 310 CMR 30.900 as a result of ATF-Davidson Co. having submitted
(name of company)

a request for change of status and this certification, so long as ATF-Davidson Co. abides by the terms of this certification.
(name of company)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment.

D Marques
(Signature)

Daniel Marques
(Name typewritten)

M E M O R A N D U M

CERCLA LIST

RE: A.T.F. Davidson
Main Street
Whitinisville, Massachusetts 01588

TO: John A. Desmond

FROM: John F. Kronopolus JFK

DATE: December 10, 1982

A meeting/inspection was conducted at the subject facility on December 8, 1982 in conjunction with CERCLA List Activity. The following was revealed during the meeting/inspection:

(1) A.T.F. Davidson is a subsidiary of White Consolidated Industries. Daniel Marques, Manager of Facilities for A.T.F. stated that White Consolidated Industries and A.T.F. have operated this site since its construction in the early 1900's (See attached sheets for layout of site and dates of building construction). The site was primarily used to manufacture textile machinery until 1979 at which time it started to produce its current product, graphic arts equipment.

(2) The operations in these buildings included machinery of metal stock, plating, painting, heat treating, and foundry operations. The wastes generated included foundary sand (isopropylene binder), paint, plating sludge, plating rinsewaters, bromide salt baths, solvents, cutting oils, and coal ash.

(3) All of the wastes stated above, except for the plating rinses, were disposed of at the Landfill located on the sites. Mr. Marques stated that he was pretty sure that approximately 90% of what was disposed of was foundry sand and approximately 5% of what was disposed of was coal ash from their coal fired heating system. The other 5% was the remaining wastes mentioned above. Mr. Marques will research and write up as complete a history of the site as possible regarding manufacturing operations wastes produced and submit it to this office as soon as possible.

(4) Plating rinsewaters, spent stripper and cleaning solutions, along with some sludges were discharged to the adjacent Mumford River until mid-1982. At that time Mr. Marques installed an ion exchange system which allows A.T.F. to re-use all rinsewaters from the plating operation. Copies of 1981 and 1982 chemical analyses of effluent from the plating operations (in file) reveal that the parameters tested for, appear very low and not of major concern regarding CERCLA Activity. If these analyses accurately reflect what was discharged to the river in years past, then this discharge probably did not cause or will cause an environmental problem. Mr. Marques will submit a copy of analytical results obtained from a sample taken from the Mumford River downstream of the site.

December 10, 1982

RE: A.T.F. Davidson
Main Street
Whitinsville, Massachusetts 01588

(5) A.T.F. currently employs less than 500 people (2700 in prosperous times) and produces approximately 1-2 drums of hazardous waste. Much of the activity formerly done at this site are now done by outside firms.

The Landfill may be of concern regarding CERCLA Activity as it is unknown what quantities of a particular waste is buried there. Also the Landfill is located approximately 100 feet from the Mumford River. The discharges from the plating operations may not be of too much concern regarding CERCLA Activity. Mr. Marques' history of the site and the chemical analysis of the river may help to determine what the next course of action will be.

JFK/bk

Sub → AIF-Davidson 12/9/82

White Consolidated Ind, Inc.

Plating Sludge

Plating Effluent to Mumford RIVER

Pretreatment → Ion Exchange

Backwash to barrels → Chem Waste Management

Landfill - Foundry Ash

Waste Richard Hill (Cleveland) → 216 - 252 - 3700

≥ 5% ~~Cal~~ Ash

> 90% foundry sand - isopropylene - Binder resins

Paint - PA... + Booth

Plating sludge

Salt Bath - Cyanide & sulfamates

Cutting oils

2500 → 3800 people employed 1960's

500 NOW

1.3 million square ft of mfg plant → Founding for textile plant

Textile Plant to late 1979 → plating

mfg graphic Arts machinery

Mr Marquess will give history of site.

Chemical analyses of water - downstream.

DEQE - Division of Hazardous Waste - Site Log

Completed By: John F. Kronopolus **Date:** 12/8/82

Site Name: A.T.F. Davidson - Discharge to River & Landfill

Site Address: Main Street, Whitinsville, MA 01588

1. **Site History:**

A.T.F. Davidson (A subsidiary of White Consolidated Industries) manufactured textile machinery from the 1920's to 1979 at which time it started to manufacture its current product, graphic arts machinery. The operations in these buildings include machining of metal stock, plating, painting, heat treating, and foundry operations. The plating rinses were discharged to the Mumford River with EPA approval (See attached reports submitted to the EPA) until a treatment - recirculation system was put in operation in mid 1982. All other wastes probably found their way to the landfill that ATF operated located between the main facility and their "Arcade" building. (See attached Memo). Daniel Marques, Manager of Facilities, will submit a history of the site.

2. **Wastes on Site and Impacts:** (Copies of pertinent data may be attached.)

Waste Type	Collected & Analyzed By	Date	Results (Include Physical State & Quantity)
			Currently Under Investigation

3.

Impacts	Collected & Analyzed By	Date	Location and Results
Surface Waters			Currently Under Investigation
Sediments			Currently Under Investigation
Soils			Currently Under Investigation
Groundwater			
Public W.S.			Currently Under Investitation
Private W.S.			Currently Under Investigation
Other			Currently Under Investigation

	Collected & Analyzed By	Date	Location & Results
Air	Does not appear to be applicable.		
Particulates			
Organics			
Odors			
Other			

Site Security

Is the site accessable to public?

Locked fences surround ATF Property

Is the waste uncontrolled? (e.g. leaking drums, unlined lagoon, leachate)

Landfill is unlined

Fire & Explosion potential:

Minimal if any

Public health impacts:

Currently under investigation

Distance to nearest surface water: Landfill is 75ft. from Mumford River **Public water supply:** No.

Other uses of surface water within 3 mile radius(industrial, irrigation, etc.):

Possibly used as non-contact cooling water. River may also receive NPDES permitted wastes.

Population served by potentially impacted surface water within 3 mile radius: 0

Distance to nearest ground water supply: 1 Mile **Public or private supply:** Public

Other uses of ground water within 3 mile radius (industrial, irrigation) :

Under Investigation

Depth to ground water: Unknown **Soil permeability:** Unknown **Depth to bedrock:** Unknown

Demographics

Population within 3 mile radius: 12,000

Number of buildings within 3 mile radius: Unknown **Type:** Residential Commercial Industrial

Nearest buildings to site: ATF Building **Type:** Industrial

Wetlands involvement:

None

Contacts

Locals involved:

Daniel Marques, ARF Davidson, Main Street, Whitinsville, MA 01588
Spaulding R. Aldrich, LHWC, Memorial Town Hall, Whitinsville, MA 01588

Other environmental or health agencies:

Publicity (Media or Political)

Enforcement

Is the generator or responsible party known? (Give details)

ATF Davidson (White Consolidated Industries) is the responsible party.

When last inspected? 12/8/82 By who? John F. Kronopolus

Status of Enforcement:

Are Orders outstanding? Are timetables being met?

New proposed actions:

Comments:

This site is currently under investigation by Central Region Staff to determine extent of on site contamination and what impact this may have on the environment.

NOTIFICATION ID NO.	SITE NAME SITE STREET SITE CITY SITE COUNTY EPA SITE ID NO.	REQUIRED NOTIFIER NAME REQUIRED NOTIFIER STREET REQUIRED NOTIFIER CITY STATE ZIP (CONTACT NAME/TITLE) (CONTACT PHONE)	NOTIFIER STATUS (PRES OWN, PAST OWN PRES OP, PAST OP TRANSPORTER, VOLUNTEER)
MAS000001112	ATF DAVIDSON MAIN ST WHITINSVILLE 01588 WORCESTER MAD980520639	AFT DAVIDSON MAIN ST WHITINSVILLE MA 01588 (MARQUES,DANIEL /MNGR FACIL) (617-234-7451)	PRES OWN

RELEASES TO THE ENVIRONMENT: LIKELY

DATES OF WASTE HANDLING: 1930 TO 1965

WASTE AMOUNT: 0 AREA: 0 MAP PRESENT: NO FORM TYPE: 8900-1

NOTIF. POSTMARKED DATE: 81/06/09 SIGNATURE PRESENT: YES DATE OF LAST UPDATE: 82/02/05

TYPE OF FACILITY	TYPES OF WASTES	SOURCES OF WASTE
OTHER-(SEE COMMENTS)	SPENT BATH SOLU FM ELECTROPLATING OPER SLUDGES FM BOTTOM OF BATH FM ELECTRPLTNG OPER SPENT STRIP & CLEAN BATH SOLU FM ELECTRPLTNG OPER	

COMMENTS	SEQ NO.
WASTE WATER DISCHARGED INTO RIVER	1
UNTIL 1965	2
BOTTOM MUMFORD RIVER	600

NOTIFICATION ID NO.	SITE NAME SITE STREET SITE CITY SITE COUNTY EPA SITE ID NO.	REQUIRED NOTIFIER NAME REQUIRED NOTIFIER STREET REQUIRED NOTIFIER CITY STATE ZIP (CONTACT NAME/TITLE) (CONTACT PHONE)	NOTIFIER STATUS (PRES OWN, PAST OWN PRES OP, PAST OP TRANSPORTER, VOLUNTEER)
MAS000001113	ATF DAVIDSON MAIN ST WHITINSVILLE 01588 WORCESTER MAD980520639	AFT DAVIDSON MAIN ST WHITINSVILLE MA 01588 (MARQUES,DANIEL /MNGR FACIL) (617-234-7451)	PRES OWN

RELEASES TO THE ENVIRONMENT: NONE

DATES OF WASTE HANDLING: 1930 TO 1979

WASTE AMOUNT: 40,000 CU FT AREA: 730,000 SQ FT MAP PRESENT: NO FORM TYPE: 8900-1

NOTIF. POSTMARKED DATE: 81/06/09 SIGNATURE PRESENT: YES DATE OF LAST UPDATE: 82/02/05

TYPE OF FACILITY	TYPES OF WASTES	SOURCES OF WASTE
LANDFILL	ELECTROPLATING TREAT SLUDGE SALT BATH POT CLEANG SOLU FM METAL HEAT TREAT OPER	

COMMENTS	SEQ NO.
SITE USED FOR TEXTILE PRODUCTION	1
SAND DEPOSITED ADJECNT TO PLANT	2

Field Inspection: 12/9/82

ENVIRONMENTAL PROTECTION AGENCY
NOTIS DATA MANAGEMENT SYSTEM

NOTIS REPORT #4 — LISTING BY FACILITY — REPORT DATE: 02/17/82

REGION: 01 STATE: MA

NOTIFICATION ID NO.	SITE NAME / SITE STREET / SITE CITY / SITE COUNTY / EPA SITE ID NO.	REQUIRED NOTIFIER NAME / REQUIRED NOTIFIER STREET / REQUIRED NOTIFIER CITY / STATE / ZIP / (CONTACT NAME/TITLE) / (CONTACT PHONE)	NOTIFIER STATUS (PRES OWN, PAST OWN, PRES OP, PAST OP, TRANSPORTER, VOLUNTEER)
MAS000001112	ATF DAVIDSON MAIN ST WHITINSVILLE 01588 WORCESTER MAD980520639	AFT DAVIDSON MAIN ST WHITINSVILLE MA 01588 (MARQUES,DANIEL /MNGR FACIL) (617-234-7451)	PRES OWN

RELEASES TO THE ENVIRONMENT: LIKELY

DATES OF WASTE HANDLING: 1930 TO 1982

WASTE AMOUNT: 0 AREA: 0 MAP PRESENT: NO FORM TYPE: 8900-1

NOTIF. POSTMARKED DATE: 81/06/09 SIGNATURE PRESENT: YES DATE OF LAST UPDATE: 82/02/05

TYPE OF FACILITY	TYPES OF WASTES	SOURCES OF WASTE
OTHER-(SEE COMMENTS)	SPENT BATH SOLU FM ELECTROPLATING OPER SLUDGES FM BOTTOM OF BATH FM ELECTRPLTNG OPER SPENT STRIP & CLEAN BATH SOLU FM ELECTRPLTNG OPER	

COMMENTS	SEQ NO.
WASTE WATER DISCHARGED INTO RIVER	1
UNTIL 1983	2
BOTTOM MUMFORD RIVER	600

NOTIFICATION ID NO.	SITE NAME SITE STREET SITE CITY SITE COUNTY ERA SITE ID NO.	REQUIRED NOTIFIER NAME REQUIRED NOTIFIER STREET REQUIRED NOTIFIER CITY STATE ZIP (CONTACT NAME/TITLE) (CONTACT PHONE)	NOTIFIER STATUS (PRES OWN, PAST OWN PRES OP, PAST OP TRANSPORTER, VOLUNTEER)
MAS000001113	ATF DAVIDSON MAIN ST WHITINSVILLE 01588 WORCESTER MAD980520639	AFT DAVIDSON MAIN ST WHITINSVILLE MA 01588 (MARQUES,DANIEL /MNGR FACIL) (617-234-7451)	PRES OWN

RELEASES TO THE ENVIRONMENT: NONE

DATES OF WASTE HANDLING: 1930 TO 1979

WASTE AMOUNT: 40,000 CU FT AREA: 730,000 SQ FT MAP PRESENT: NO FORM TYPE: 8900-1

NOTIF. POSTMARKED DATE: 81/06/09 SIGNATURE PRESENT: YES DATE OF LAST UPDATE: 82/02/05

TYPE OF FACILITY	TYPES OF WASTES	SOURCES OF WASTE
LANDFILL	ELECTROPLATING TREAT SLUDGE SALT BATH POT CLEANG SOLU FM METAL HEAT TREAT OPER	

COMMENTS	SEQ NO.
SITE USED FOR TEXTILE PRODUCTION	1
SAND DEPOSITED ADJECNT TO PLANT	2

MEMORANDUM

COPY

file

SUBJECT: A.T.F. Davidson Company
Change in Status from TSD-G
to Generator Status

TO: Linda Benevides

FROM: Dick Johnson

DATE: Septmeber 28, 1982

On September 16, 1982 an inspection was conducted at A.T.F. Davidson Company, located on Main Street, Whitnsville, Massachusetts.

A.T.F. Davidson Company requested a change in TSD Status to Generator as a direct result of Consolidation and Economic reasons; also they are in the process of selling certain sections of the factories, such as the plating and steel fabricating buildings. A.T.F. Davidson is aware of the fact that all hazardous waste must be shipped off premises within ninety (90) days after accumulation of 1000 kg.

I would recommend the request from A.T.F. Davidson Company be approved to Generator Status.

JAD/DJ:bk

Now do not want to Change

J.K.

Site ID # MAD 046128559

Part A Application Yes____ No____

RCRA INSPECTION CHECKLIST

Site Name: ATF Davidson Inspection Date: Sept. 16, 1982

Site Location: Main St. Whitinsville Type of Facility: Graphic Mach Mfg

Generator: ✓

Phone No: (617) 234-7451 Transporter:

Inspectors: TSD:

EPA: Permits Issued:

State: Richard Johnson

Industry: Mr Marques Facilities & Energy Mgr. In Compliance Yes _____ No_____

I. Generator with Temp. Storage or TSD Facility

A. Pre-Inspection Meeting

1. General Information (Process Description, etc.)

Graphic Arts Equipment purchase casting from other Company, Machine paint assemble and ship

ATF Davidson requests a change in TSD - Gen. Status To Generator Status only

A.T.F. Davidson company representative Mr Marques states he would not be generating more than 10 to 2-55 gallon drums of waste per month

2. Hazardous Waste Profile

Type of Waste	Amt. of Waste kg/mo	Onsite Temp. Storage/ TSD	Transporter	Offsite TSD
1	45 → 55 Gal drums	Nickle Sludge		
Waste Oils	8-55 Gal. drums Monthly	McDonald & Watson Waste Oil Co Sutton Rd, Peep Toad Rd 1-401 934-0331	Sutter Takes Sludges	

This hazardous was accumulated for some time because of ATF Davidson Co TSD STATUS because of Consolidation a minimal amount of waste 2-55 gal drums may be generated

3. Records

262.21 a.) Manifest — Manifests may be checked ahead of time by state personnel who have them on file - otherwise, random selection of some during inspection for review. Must be kept for 3 years.

1) Document No.: MA 0077897

2) Generator ID, name, address: MAD046128559 ATF Davidson Main ST. Whitinsville Ma

3) Transporter(s) ID, name, address: MAD980523203 Chemical Waste Management 5 Strathmore Rd natick

4) TSD Facility ID, name, address:

5) Waste Type of Quantity: 45-55 Gal. drums Nickel Sludge

6) Date of Acceptance: 9-3-82

262.50 i) International Shipping Manifest:

262.42 ii) Exception Report:

265.13 b.) Waste Analysis Plan

1. Plan on site: _____

2. Plan should include (a) parameters: _____

(b) test methods: _____

(c) sampling method: _____

(d) frequency: _____

3. Copy of Results _____

265.15 c.) Inspection Schedule and log

1) Are inspections conducted yes

2) *Written inspection schedule no

3) Inspection Log no

(A) Daily - loading and unloading of areas subject to spills: _____
- discharge control equipment in tanks: _____
- incinerator system, thermal treatment equilpment,
- chem/phys/biol treatment equipment: _____
- freeboard level of surface impoundments: _____

(B)* Weekly - physical conditions of containers: _____
- " tanks: " _____
- " surface impoundments: _____
- " chem/phys/bio. treatment facility: _____

265.16 *d.) Personnel Training Records

1.) Job titles/position descriptions and name of employee

Mr. Marques Facilities & Energy Manager

2.) Description of training: Attended EPA Seminars Webash

3.) Records of Training: _____

4.) Training completed: _____

* Required for Temporary Storage

*e.) Contingency Plan

265.53 1. Plan on site: ___

265.53 2. Plan to local authorities: ___

265.52 3. Content of Plan: ___

a) Emergency plan: ___

b) Local authority arrangements: ___

c) Identify emergency coordinator: Mr Daniel Marques

d) List of emergency ~~plans~~ equipment: ___

e) Evacuation plans: ___

f.) Closure and Post-closure Plans; Cost Estimates

265.112, .113, .114, .115 1. Closure Plan (TSD Facilities) -

a) Plan on site:

b) Does plan include:

1) Schedule of partial closure if applicable: ___

2) Estimate of maximum inventory of waste in storage or treatment at given time: ___

3) Schedule for final closure & an estimate of the expected year of closure: ___

4) Description of steps needed to decontaminate facility equipment: ___

5) Total time required for closure: ___

6) Certification of closure: ___

265.117, .118 2. Post-closure Plan (disposal facilities only)

a) Plan on site: ___

b) Does plan identify and include frequency of: ___

o planned ground water monitoring: ___
o planned maintenance & security activities: ___
o name, address and phone number of Post-closure contact: ___

c) Length of Post-closure period identified: ___

* Required for Temporary Storage

265.142 3. Closure Cost Estimate (TSD facilities)

a) Estimate on site: Amount of estimate:

b) Estimate adjusted annually on 11/19 for inflation:

c) Has Closure Plan changed?

d) If answer to 3 is yes, has cost estimate changed?

265.144 4. Post-closure Cost Estimate (disposal facilities only)

a) Estimate on site: Amount of estimate:

b) Estimate adjusted annually on 11/19 for inflation:

c) Has Post-closure plan changed?

d) If answer to 3 is yes, has cost estimate changed?

265.73 g) Operating Records

1. Records on site _____

2. Description, quantity, method and dates of disposal: _____

_____

3. Location onsite and manifest number: _____

_____

4. Results of waste analysis: _____

5. Record of any incidents requiring use of contingency plan: ____

_____

6. Records and results of inspections: _____

7. Closure and post-closure cost estimates if needed: _____

B. Inspection

265.14 1. Site Security

a) 24 hour surveillance system: yes

b) or Artificial or natural barrier: yes

c) and Means to control entry: yes

d) Danger sign posted at each entrance legible at 25': yes

265.30-.37 **2. Site Preparedness/Prevention

a) Internal communication/alarm: yes

b) Telephone/2-way radio: _____

c) Portable fire control equipment: yes

d) Adequate water for fire control: yes

e) Testing and Maintenance of equipment: yes

f) Adequate aisle spare: yes

g) Access to equipment: good

265,170-.177 3. Containers

Leaks _____

Ruptures _____

Corrosion _____

Closed Except in use _____

Heat/Pressure _____

50' bufferzone for I and R wastes:

I = Ignitable _____; R = Reactive _____

No smoking signs near I or R waste _____

Separation of incompatible wastes _____

Evidence of spills _____

262.30-.34 Pretransport requirements: packaging _____

labelling _____

marking _____

placarding _____

Date of Waste Accumulation _____

*NYR Check for impermeable base under containers, any drains, secondary containment

*NYR - Not yet regulated
**Required for Temporary Storage

265.190-.199 4. Tanks

Leaks _____

Ruptures _____

Corrosion: Check valves, piping controls for signs of corrosion _____

≥ 2' freeboard or containment _____

Heat/pressure _____

Evidence of spills _____

Inflow and outflow controls _____

Continuous Inflow _____ Means to stop flow? _____

Special Requirements for I and R wastes _____

265.220-.230 5. Surface Impoundments (Pits, Ponds and lagoons)

Protective Cover on Dikes _____

≥ 2' freeboard _____

Special requirements for I and R waste _____

Evidence of fire, explosion - leak _____

*NYR Liner _____

265.90-.94 **Groundwater Monitoring _____

265.250-.257 6. Waste Piles

Wind erosion control _____

**Prevention of leachate from pile (if hazardous) _____

Special requirements for I and R waste _____

Evidence of fire, explosion, leak _____

Separation of incompatible wastes _____

Waste analysis _____

*NYR - Not yet regulated

**November 19, 1981

265.340
265.382

7. Incinerators/Thermal Treatment

a) Steady State conditions _____

b) Inspect combustion and emission control instruments every 15 minutes _____

c) Observe stack plume hourly _____

d) Waste analysis:

1) Heating value of waste _____

2) Organic halogen content _____

3) Sulfur content _____

4) Lead concentrations _____

5) Mercury concentrations _____

e) Evidence of leaks of spills (pumps, valves, conveyors and pipes) _____

f) Daily Inspection of Emergency shutdown controls and Alarm systems _____

g) Special Requirements for incompatible wastes _____

265.272 -
265.282

8. Phys/Chem/Bio. Treatment

a) Leaks _____

b) Ruptures _____

c) Corrosion _____

d) Waste cut off _____

e) Waste analysis _____

f) Special Requirements for I and R waste _____

g) Special Requirements for incompatible wastes _____

265.272 - 265.282 9. Land Treatment

a) Approval document _____

*b) Run-on diversion _____

*c) Run-off collection; Treat if necessary _____

d) Waste Analysis _____

e) Presence of food chain crops, if so, refer to 265.276 _____

f) Unsaturated zone monitoring plan _____

g) Unsaturated zone waste analysis _____

h) Records of application dates, rates, quantities and location of waste _____

i) Special requirements for I and R wastes _____

j) Special requirements for incompatible wastes _____

265.90-.94 *k) Groundwater Monitoring _____

265.302-.315 10. Landfills

*a) Run-on diversion _____

*b) Run-off collection; Treat if necessary _____

c) Wind dispersion controlled _____

d) Records of all dimensions, locations, and contents _____

e) Special Requirements for I and R wastes _____

f) Special Requirements for Incompatible Wastes _____

*g) Special Requirements for liquids _____

*h) Reduction in volume of empty containers _____

265.90-.94 *i) Groundwater Monitoring _____

Subpart R 11. Underground Injection

Consult appropriate subparts.

*November 19, 1981

C. Requests for Information

D. Photos Taken

E. Sampling Inspection Needed

F. Potential for Imminent Hazard, Air, or Water Discharge Violations

G. Proximity to Residential Area, Surface Water, Recharge Zone, etc.

MEMORANDUM

TO: ~~DREE~~, John Kronopolous, Central Region, DHW

FROM: Linda Benevides

DATE: 9/8/82

SUBJECT: Requests to amend Part A (Facility) Permit Applications (one additional request) - ATF Davidson

Attached are the above-mentioned requests forwarded to us by the EPA. These companies have had some change in status which they want to have reflected in their EPA notification or on their Part A application. Some of these changes are minor and may reflect an error in their original submittal. However, some of the changes eg. from facility status to generator, company no longer in business, a disposal facility that requires closure, etc., may require a follow-up by phone or through an inspection. I am forwarding all requests to you for your information and decision.

Please let me know which changes your office feels can go through at EPA and which changes you would like to investigate. I will call your office next week to check the status of these determinations.

LB/jm

ATF-DAVIDSON COMPANY

[illegible] STREET
WHITINSVILLE, MASSACHUSETTS 01588
(617) 234-7451 TELEX 928-429

RECEIVED
AUG 31 [illegible]
DIV. OF HAZARDOUS WASTE

August 27, 1982

Mr. Glen Gilmore
The Commonwealth of Massachusetts
Department of Environmental Quality
Engineering
Division of Hazardous Waste
1 Winter Street
8th Floor
Boston, MA 02108

Dear Mr. Gilmore:

ATF-Davidson Company is at present the holder of a hazardous waste permit No. MAD046128559. It is hereby requested that this permit be terminated.

The ATF-Davidson Company is in the process of consolidating its entire manufacturing activity into a one-floor operation, one building. This consolidation and manufacturing process change will furnish us with total control over the generation of waste which will be at a minimum level.

If additional information is required to expedite the termination of the above permit, please contact the ATF-Davidson Company's Facilities and Energy Manager, Daniel Marques, Tel. No. (617)-234-7451, Ext. 218.

Your cooperation and an early decision on the above subject will be appreciated.

Sincerely,

ATF-DAVIDSON COMPANY

D Marques

Daniel Marques
Facilities & Energy Mgr.

DM:lk

attachment

U S ENVIRONMENTAL PROTECTION AGENCY

ACKNOWLEDGEMENT OF APPLICATION FOR A HAZARDOUS WASTE PERMIT

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility with the EPA Identification Number shown on the front of this postcard; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

EPA Form 3510-3A (12-80)

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ▷ *MAD006128559

ATP-DAVIDSON CO INC
MAIN ST
WHITINSVILLE MA 01588

INSTALLATION ADDRESS ▷ MAIN ST
WHITINSVILLE MA 01588

[illegible] (8-80)

To: John Desmond

From: Carl de Groot.

Re: ATF Davidson, Northbridge -
Date: May 1, 1982

On April 24, 1985 a site inspection of ATF Davidson Co. in Northbridge, MA was performed by Susan Corderman + Carl de Groot. The purpose of this inspection was to check on a recent report of an oil sheen on the Mumford River ~~which runs through~~ near the ATF Davidson property as well as to tour the CERCLA-notified portions of the property currently being

assessed. Company representative Richard Hill from White Consolidated Industries, Inc. (Cleveland, Ohio corporate headquarters) was present as was Daniel Marques, ATF Davidson's Manager of Facilities + Energy and Philip Whitney of ATF Davidson.

PART B: GENERATOR'S COPY (mailed to Boston U/S Bureau of Water Waste)

GENERATOR EPA ID NO. MAD046128559

TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF DELIVERY AND NON-TAMPERING WITH SHIPMENT-ALSO PRINT SIGNATURE: T.F. Gundlach

DATE DELIVERED: 10 23 81 (MO. DAY YR.)

TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT-ALSO PRINT SIGNATURE

TRANSPORTER NO. 2 SWA REGISTRATION NO.

DATE RECEIVED: MO. DAY YR.

TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION OF DELIVERY AND NON-TAMPERING WITH SHIPMENT-ALSO PRINT SIGNATURE

DATE DELIVERED

TO BE TRANSPORTER

Form VHW-001 (10/80)

STATE OF NEW JERSEY
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Please TYPE all information.

HAZARDOUS WASTE MANIFEST

PART A: GENERATOR'S COPY

DOCUMENT NO. NJ 0067638

GENERATOR NAME	PHONE (INCLUDE AREA CODE)	EPA ID NO.
A.T.F. Davidson Co.	617-234-7451	MAD046128559

ADDRESS (STREET - CITY - STATE - ZIP CODE): Main St. Whitinsville Mass 01588

TRANSPORTER NO. 1	PHONE (INCLUDE AREA CODE)	EPA ID NO.
Environmental Transfer Corp	201-539-7111	NJT000029389

ADDRESS (STREET - CITY - STATE - ZIP CODE): 52 Speedwell Ave Morris Plains N.J.

TRANSPORTER NO. 2	PHONE (INCLUDE AREA CODE)	EPA ID NO.

ADDRESS (STREET - CITY - STATE - ZIP CODE):

TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY	PHONE (INCLUDE AREA CODE)	EPA ID NO.
Emergency Technical Service Corp	201-697-4424	NJD000692055

SITE ADDRESS (STREET - CITY - STATE - ZIP CODE): RT 515 Vernon N.J.

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE

THIS FORM IS NO. 1 **OF A TOTAL OF** 1. **THE FIRST MANIFEST DOCUMENT NO. IS** NJ→

	PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM	NET QUANTITY	UNITS	CONTAINERS NO.	CONTAINERS TYPE	EPA HAZ CODE	EPA WASTE TYP
1.	Waste Picric Acid (Wet)	Flammable Solid	NA1344	2	001.3	3	001	07	R	D00
2.										
3.										
4.										
5.										
6.										

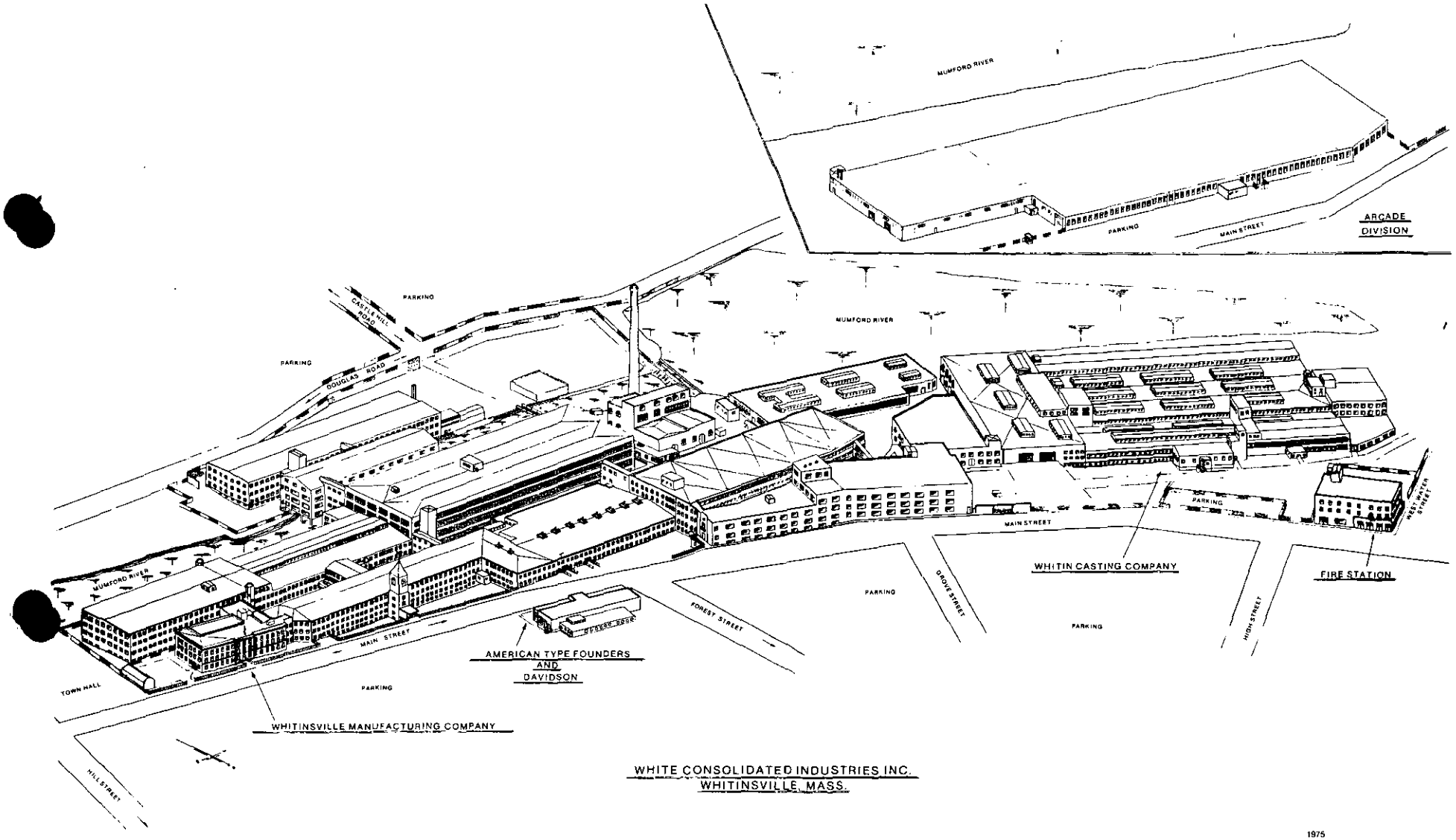
SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES INCLUDED I SHIPMENT OF A NONHAZARDOUS NATURE WHICH DO NOT HAVE TO BE MANIFESTED)

TO BE TYPED IN BY GENERATOR

GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labelled and are proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA and the State. The wastes describ above were consigned to the Transporter named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste, and has valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

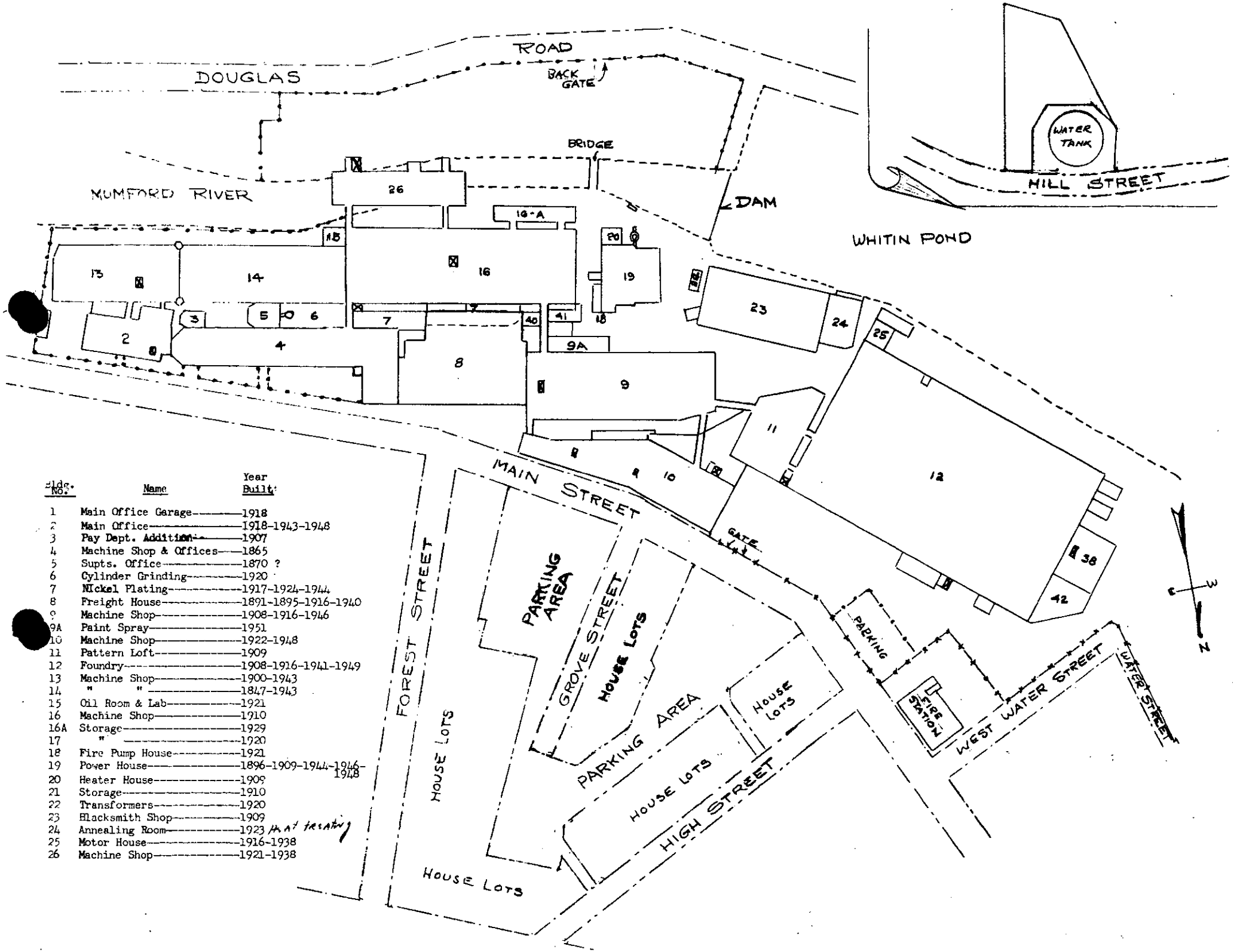
GENERATOR'S SIGNATURE - ALSO PRINT SIGNATURE	TITLE	DATE SHIPPED (MO. DAY YR.)	EXPECTED ARRIVAL DA (MO. DAY YR)
DANIEL MARQUES		10 22 81	10 23 81

TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT - ALSO PRINT SIGNATURE	TRANSPORTER NO. 1 SWA REGISTRATION NO.	DATE RECEIVED (MO. DAY YR)
T.F. Gundlach	NJSWA5632 1AT	10 22 81



WHITE CONSOLIDATED INDUSTRIES INC.
WHITINSVILLE, MASS.

1975



Bldg. No.	Name	Year Built
1	Main Office Garage	1918
2	Main Office	1918-1943-1948
3	Pay Dept. Addition	1907
4	Machine Shop & Offices	1865
5	Supts. Office	1870 ?
6	Cylinder Grinding	1920
7	Nickel Plating	1917-1924-1944
8	Freight House	1891-1895-1916-1940
9	Machine Shop	1908-1916-1946
9A	Paint Spray	1951
10	Machine Shop	1922-1948
11	Pattern Loft	1909
12	Foundry	1908-1916-1941-1949
13	Machine Shop	1900-1943
14	" "	1847-1943
15	Oil Room & Lab	1921
16	Machine Shop	1910
16A	Storage	1929
17	"	1920
18	Fire Pump House	1921
19	Power House	1896-1909-1944-1946-1948
20	Heater House	1909
21	Storage	1910
22	Transformers	1920
23	Blacksmith Shop	1909
24	Annealing Room	1923 Heat treating
25	Motor House	1916-1938
26	Machine Shop	1921-1938

EPA Notification of Hazardous Waste Site

United States Environmental Protection Agency
Washington DC 20460

This initial notification information is required by Section 103(c) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 and must be mailed by June 9, 1981.

Please type or print in ink. If you need additional space, use separate sheets of paper. Indicate the letter of the item which applies.

MAS000001112

810609

REQ.

A Person Required to Notify:
Enter the name and address of the person or organization required to notify.

Name: ATF Davidson
Street: Main Street
City: Whitinsville, State: MA Zip Code: 01588

B Site Location:
Enter the common name (if known) and actual location of the site.

Name of Site: ATF Davidson
Street: Main Street
City: Whitinsville County: Worchester State: MA Zip Code: 01588

MAD046128559

C Person to Contact:
Enter the name, title (if applicable), and business telephone number of the person to contact regarding information submitted on this form.

Name (Last, First and Title): Marques, Daniel, Mgr of Facilities
Phone: (617) 234-7451

D Dates of Waste Handling:
Enter the years that you estimate waste treatment, storage, or disposal began and ended at the site.

From (Year): 1930 To (Year): 1965

E Waste Type: Choose the option you prefer to complete

Option 1: Select general waste types and source categories. If you do not know the general waste types or sources, you are encouraged to describe the site in Item I—Description of Site.

General Type of Waste:
Place an X in the appropriate boxes. The categories listed overlap. Check each applicable category.

1. ☐ Organics
2. ☐ Inorganics
3. ☐ Solvents
4. ☐ Pesticides
5. ☐ Heavy metals
6. ☐ Acids
7. ☐ Bases
8. ☐ PCBs
9. ☐ Mixed Municipal Waste
10. ☐ Unknown
11. ☐ Other (Specify)

Source of Waste:
Place an X in the appropriate boxes

1. ☐ Mining
2. ☐ Construction
3. ☐ Textiles
4. ☐ Fertilizer
5. ☐ Paper/Printing
6. ☐ Leather Tanning
7. ☐ Iron/Steel Foundry
8. ☐ Chemical, General
9. ☐ Plating/Polishing
10. ☐ Military, Ammunition
11. ☐ Electrical Conductors
12. ☐ Transformers
13. ☐ Utility Companies
14. ☐ Sanitary Refuse
15. ☐ Photofinish
16. ☐ Lab/Hospital
17. ☐ Unknown
18. ☐ Other (Specify)

Option 2: This option is available to persons familiar with the Resource Conservation and Recovery Act (RCRA) Section 3001 regulations (40 CFR Part 261).

Specific Type of Waste:
EPA has assigned a four-digit number to each hazardous waste listed in the regulations under Section 3001 of RCRA. Enter the appropriate four-digit number in the boxes provided. A copy of the list of hazardous wastes and codes can be obtained by contacting the EPA Region serving the State in which the site is located.

F007		
F008		
F009		

UNCONTROLLED WASTE SITES
HAZARDOUS MATERIALS DIV.
JUN 11 1981

Form Approved
OMB No. 2060-0138

Notification of Hazardous Waste Site — Side Two

F Waste Quantity

Place an X in the appropriate boxes to indicate the facility types found at the site.

In the "total facility waste amount" space give the estimated combined quantity (volume) of hazardous wastes at the site using cubic feet or gallons.

In the "total facility area" space, give the estimated area size which the facilities occupy using square feet or acres.

Facility Type

1 ☐ Piles
2 ☐ Land Treatment
3 ☐ Landfill
4 ☐ Tanks
5 ☐ Impoundment
6. ☐ Underground Injection
7 ☐ Drums, Above Ground
8. ☐ Drums, Below Ground
9 ☐ Other (Specify) bottom Mumford River

Total Facility Waste Amount

cubic feet: unknown
gallons:

Total Facility Area

Square feet: unknown
acres:

G Known, Suspected or Likely Releases to the Environment:

Place an X in the appropriate boxes to indicate any known, suspected, or likely releases of wastes to the environment.

☐ Known ☐ Suspected ☒ Likely ☐ None

Note: Items H and I are optional. Completing these items will assist EPA and State and local governments in locating and assessing hazardous waste sites. Although completing the items is not required, you are encouraged to do so.

H Sketch Map of Site Location: (Optional)

Sketch a map showing streets, highways, routes or other prominent landmarks near the site. Place an X on the map to indicate the site location. Draw an arrow showing the direction north. You may substitute a publishing map showing the site location.

N

I Description of Site: (Optional)

Describe the history and present conditions of the site. Give directions to the site and describe any nearby wells, springs, lakes, or housing. Include such information as how waste was disposed and where the waste came from. Provide any other information or comments which may help describe the site conditions.

discharge of untreated electroplating wastewater to river was discontinued with the installation of a wastewater treatment plant in 1965. It is believed that the quantity of material disposed was small compared to the size of the Mumford River. The concentration of metals in the wastewater was relatively low and since this disposal ceased 16 years ago, it is highly unlikely that any measurable levels remain in the river.

J Signature and Title:

The person or authorized representative (such as plant managers, superintendents, trustees or attorneys) of persons required to notify must sign the form and provide a mailing address (if different than address in item A). For other persons providing notification, the signature is optional. Check the boxes which best describe the relationship to the site of the person required to notify. If you are not required to notify check "Other".

Name: Richard C. Bryan, President
Street: ATF-DAVIDSON COMPANY
Main Street
City: Whitinsville State: Mass Zip Code: 01588
Signature: [signature] Date: 6-9-81

☒ Owner, Present
☐ Owner, Past
☐ Transporter
☐ Operator, Present
☐ Operator, Past
☐ Other

[FR Doc. 81-11500 Filed 4-14-81; 8:45 am]

BILLING CODE 6560-29-C

MEMORANDUM

SUBJECT: Surface Impoundment Inspection, A.T.F. Davidson Co., Inc. Northbridge

filed - Whitinsville, MA

TO: Ed Benoit

FROM: Stan Szczurko Jr.

DATE: January 19, 1981

An inspection on the above subject facility was made by the writer on January 8, 1981. Accompanying the writer was Mr. Joseph Rosol, Plant Engineer for A.T.F.

Mr. Rosol pointed out that there had been two distinct areas, which the company owned and filled in the past. The first one located across the Mumford River off Douglas Avenue, had been a marsh. Fly ash had been used to fill in this 2 acre parcel. This site has been filled in and abandoned since 1950. The area has been graded, a vegetative growth covers the site and no leachate or runoff could be noticed.

A second area of approximately 5 to 7 acres is located on Main Street adjacent to the Whitin Casting Company. This particular site had been part of the Mumford River but had been filled since the 1890's. Mr. Rosol could only offer his knowledge of the material used for fill which was, gravel, excavation fill, building debris, fly ash and other ash resulting from coal fired furnaces and boilers. A small pond approximately 20' X 50' still exists but has not been filled because of current wetland regulations.

Both these sites appeared not to pose any environmental hazard but during this inspection the pond had been frozen and snow covered the area. As a result the writer suggests; 1 - a follow-up inspection in the spring during more favorable weather conditions; 2 - obtain water quality analysis from the Division of Water Pollution Control, water quality and research sections in Westborough for the Mumford River; 3 - if after steps 1 and 2 above indicate some adverse impacts on the receiving water then further groundwater and/or soil analysis should be considered.

All potable water is supplied by the Town and from all indications from Mr. Rosol there water supplies are surface and located upstream of the site location.

*U. S. GOVERNMENT PRINTING OFFICE: 1978—724-845

FORM APPROVED
OMB NO. 158—S78004

U.S. ENVIRONMENTAL PROTECTION AGENCY

SURFACE IMPOUNDMENT ASSESSMENT (SIA)

OPERATIONAL FEATURES OF THE IMPOUNDMENT AND GROUND-WATER CONTAMINATION POTENTIAL

SECTION II

DATE PREPARED

MONTH	DAY	YEAR
75 76	77 78	79 80

SERIAL NUMBER: 000080

INSTRUCTIONS: This form is to be completed for one impoundment per site *(facility)* identified in Section I, Location and Count of Impoundments Form or for one impoundment per site selected via random sampling procedures. Complete multiple choice questions by entering the code number preceding the appropriate answer.

I. FACILITY IDENTIFICATION

STATE	CNTY./CITY	PLACE	CATEGORY	SIA SITE NUMBER	IMPOUNDMENT NO.	
						1
1 2	3 – 5	6 – 10	11 – 13	14 – 18	19 – 21	22

II. PURPOSE OF IMPOUNDMENT *(Enter no. in block 23)*

1. Waste Storage 2. Waste Disposal 3. Waste Treatment *(Specify below)* 4. Other *(Specify below)*

23 SPECIFY L 24 – 34

III. IMPOUNDMENT DESCRIPTION

a. Age of impoundment in years. 35 36

b. IS IMPOUNDMENT PRESENTLY USED? 1. Yes 2. NO 37

c. If answer to III.b is 'yes', give no. of years in operation. 38 39

d. If answer to III.b is 'no', give last year of operation. 40 – 43

e. Surface area of impoundment. *(in acres)* 44 – 49

f. Surface area of all impoundments at this site *(in acres)*. 50 – 56

g. Average influent into this impoundment *(gallons per day and year of record)*.

GALS./DAY	YEAR OF RECORD
2	
22 23 – 31	32 – 35

III. IMPOUNDMENT DESCRIPTION *(Continued)*

h. Average effluent for this impoundment *(gallons per day and year of record)*.

GALS./DAY	YEAR OF RECORD
36 – 44	45 – 48

i. Average daily influent for all impoundments at this facility *(gallons per day and year of record)*.

GALS./DAY	YEAR OF RECORD
49 – 57	58 – 61

j. Average daily effluent removed from all impoundments and discharged to streams, lakes, etc, *(gallons per day and year of record)*.

GALS./DAY	YEAR OF RECORD
62 – 70	71 – 74

III. IMPOUNDMENT DESCRIPTION *(Continued)*

k. TYPE OF BOTTOM LINER *(Enter no. from the types listed into blocks 23 and 24.)* IF CLAY LINER NO. 2,3 OR 4 IS SELECTED, GIVE THICKNESS IN INCHES *(Enter in blocks 25 thru 27.)*

01. None
02. Clay
03. Bentonite Modified
04. Chemically Modified Clay
05. Concrete
06. Asphalt
07. Metal
08. Polyethylene
09. Plasticized PVC
10. Butyl Rubber Sheeting
11. Hypalon Sheeting
12. Ethylene Propylene
13. Chlorinated Polyethylene
14. Other Membrane type *(Specify in blks. 28 – 39.)*
15. Other *(Specify in blocks 28 thru 39.)*

22: 3 23 25 27 28 – 39

l. FOR AGRICULTURAL IMPOUNDMENT GIVE AVERAGE DAILY NUMBER *(in blocks 40 thru 45)* AND TYPE *(in block46)* OF LIVESTOCK.

1. Cattle 2. Hogs 3. Sheep 4. Poultry 5. Other

40 – 45 46

IV. GROUND-WATER MONITORING

a. Number of monitoring wells associated with this impoundment *(if '0' enter and go to question V.b.)*. 47 48

b. FREQUENCY OF GROUND-WATER QUALITY SAMPLING FROM MONITORING WELLS. 49

1. None
2. Daily
3. Weekly
4. Monthly
5. Quarterly
6. Semi-Annually
7. Yearly
8. Other *(Specify in blocks 50 thru 61.)*

50 – 61

V. GROUND-WATER DEGRADATION

a. HAVE SIGNIFICANT CHANGES IN GROUND-WATER QUALITY BEEN OBSERVED IN ANALYSIS FROM MONITORING WELLS? *(If 'yes', explain and describe below how the site was corrected.)*

1. Yes 2. No 3. Unknown 4. Not Applicable

EXPLAIN: 62

b. HAS THE GROUND-WATER QUALITY OF DRINKING WATER WELLS IN THE AREA BEEN ADVERSELY AFFECTED BY SEEPAGE FROM THIS IMPOUNDMENT? *(If 'yes', explain below.)*

1. Yes 2. No 3. Unknown 4. Not Applicable *(Can only be used when there are no wells within one mile of impoundment.)*

EXPLAIN: 63

VI. RATING OF THE GROUND-WATER CONTAMINATION POTENTIAL *(See instruction manual EPA 570/9—78—003)*

	STEP 1		STEP 2		STEP 3		STEP 4		STEP 5	STEP 6		MISCELLANEOUS IDENTIFIERS
	UNSAT. ZONE	CONFIDENCE	G.W. AVAIL.	CONFIDENCE	G.W. QUAL.	CONFIDENCE	WASTE	CONFIDENCE	G.W. CONTAM. POTENTIAL	HEALTH HAZARD	CONFIDENCE	
4												
22	23 24	25	26 27	28	29	30	31	32	33 34	35 36	37	38 – 40

VII. WASTE IDENTIFICATION NO.

Enter the waste identification number for Part VI, Step 4. 41 – 44

1630

FORM APPROVED
OMB NO. 158-S78004

DATE PREPARED		
MONTH	DAY	YEAR
75 76	77 78	79 80

U.S. ENVIRONMENTAL PROTECTION AGENCY

SURFACE IMPOUNDMENT ASSESSMENT (SIA)
LOCATION AND COUNT OF IMPOUNDMENTS

SECTION I

SERIAL NUMBER

FACILITY IDENTIFICATION					How many impoundments are located at this site?	STATE IDENTIFICATION NO. *(Optional)*
STATE	CNTY./CITY	PLACE	CATEGORY	SIA SITE NUMBER		
MA				1		200
1 2	3 – 5	6 – 10	11 – 13	14 – 18	22	23 – 25	26 – 37

NPDES NUMBER	STANDARD INDUSTRIAL CLASSIFICATION *(SIC Code)*	SITE LOCATION							
			DEGREES	MINUTES	SECONDS		DEGREES	MINUTES	SECONDS
	3555	LATITUDE →				LONGITUDE →	0		
38 – 46	47 – 50		51 52	53 54	55 56		57 – 59	60 61	62 63

OWNER

NAME OF OWNER

2

22 – 59

OWNER'S MAILING ADDRESS *(Street No. or P.O. Box)*

3

22 – 59

CITY OR TOWN	STATE	ZIP CODE
4		
22 – 52	53 54	55 – 59

OPERATOR

NAME OF OPERATOR

5

22 – 59

OPERATOR'S MAILING ADDRESS *(Street No. or P.O. Box)*

6

22 – 59

CITY OR TOWN	STATE	ZIP CODE
7		
22 – 52	53 54	55 – 59

DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING

DIVISION OF HAZARDOUS WASTE

Central Regional Office

FIELD INVESTIGATION FORM

Investigator(s) Stan Szczuko MAD046128559

Date 1/8/81 Time _____ a.m. p.m.

Municipality Northbridge (Whitinsville) Worcester County

Name of Facility: ATF Davidson Co. Inc Tel# 617-234-7451

Address of Facility Main St.

Individual Contacted: Joseph Rossol Title Plant Engineer

Tel# 617-234-7451

NOTES RELATIVE TO CONDITIONS (Douglas Ave)

Area of fly ash impoundment, abandoned since 1950, is completely covered approximately 2 acres of shallow pond. Presently area is covered with vegetative growth. no leachate or runoff.

Area in vicinity of Whitin Casting Co., off Main St. - approximate 5 acre site had been part of the Mumford River since 1890's. has been filled with gravel, excavation fill, fly ash and ashes from coal boilers & power furnaces. - small impoundment still exist ~~covered with~~ frozen over at this time adjacent to Meadow Pond.

No water supplies nearby, water is furnished by surface reservoirs upstream of the site location

Samples Taken: Yes _____ No ✓

Date Delivered to L.E.S: _____ Individual Receiving Samples _____

ATF-DAVIDSON COMPANY

MAIN STREET
WHITINSVILLE, MASSACHUSETTS 01588
(617) 234-7451 TELEX 928-429

JAN 16 1981
C. M. A. P. C. D.

January 13, 1981

Mr. Glen Gilmore
Commonwealth of Massachusetts
Division of Hazardous Wastes
License Division
600 Washington St.
Boston, MA 02111

Dear Mr. Gilmore:

On January 9, 1981, I met with Mr. Stanley Szczurko of the Hazardous Waste Division; and based on this meeting and information received from his telepone conversation with you, we are applying for a license to generate and store hazardous waste material on the site as proposed in attached layout.

We do have our E.P.A. Identification Number (MAD046128559), and have applied for our permit. We have not held a Massachusetts license; we were not aware that it was necessary.

All hazardous waste material will be stored and accumulated for approximately 6 months, and when disposed of, will be handled to meet all necessary regulations and manifest system.

We will deeply appreciate further information on how we should proceed further in this matter.

Sincerely,

ATF-DAVIDSON COMPANY

Joseph H. Rosol
Plant Engineer

JHR:lk

cc: Mr. E. Benoit (Chief Central Regional Office - Div. of Hazardous Waste - Worcester, MA)

ATF-DAVIDSON CO.

cc: Mr. R. C. Bryan
Mr. E. Baillargeon
Mr. D. Marques

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER → MAD046128559

ATF-DAVIDSON CO INC
MAIN ST
WHITINSVILLE MA 01588

INSTALLATION ADDRESS → MAIN ST
WHITINSVILLE MA 01588

EPA Form 8700-12B (4-80)

09/26/80

Please print or type with ELITE type (12 characters/in[illegible]) in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA 0246-EPA-OT

EPA

U.S. ENVIRONM[illegible]L PROTECTION AGENCY

NOTIFICATION OF H[illegible]ARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

INSTALLATION'S EPA I.D. NO.: MAD046128559

I. NAME OF INSTALLATION: ~~Whitin Machine Works Co., Inc.~~ ATF-Davidson Co., Inc.

II. INSTALLATION MAILING ADDRESS: MAIN ST WHITINSVILLE MA 01588

III. LOCATION OF INSTALLATION: MAIN ST WHITINSVILLE MA 01588

0 0 0 3 2 8

DETACH A

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F MAD046128559 T/A 3 C 1		800807

AUG 7 - 1 30 PM '80

I. NAME OF INSTALLATION

ATF-DAVIDSON CO INC

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 MAIN STREET

CITY OR TOWN	ST.	ZIP CODE
4 WHITINSVILLE	MA	01588

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 MAIN STREET

CITY OR TOWN	ST.	ZIP CODE
6 WHITINSVILLE	MA	01588

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 ROSOL JOSEPH PLANT ENGINEER	617-234-7451

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 ATF-DAVIDSON CO WHITE CONSOLIDATED IND

DETACH A

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: MAD046128559

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	M	A	D	0	4	6	1	2	8	5	5	9	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F001	F003	F005	F006	F007	F008
7	**8**	**9**	**10**	**11**	**12**
F009	F010	F011			

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

- [X] 1. IGNITABLE (D001)
- [ ] 2. CORROSIVE (D002)
- [X] 3. REACTIVE (D003)
- [X] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
	Ernest Baillargeon Manager of Manufacturing	8/4/80

ROUTING AND TRANSMITTAL SLIP

Date 10/28/83

TO: (Name, office symbol, room number, building, Agency/Post)	Initials	Date
1. Sandra Vasil		
2. Mary Anne Gavin		
3.		
4.		
5.		

	Action		File		Note and Return
	Approval		For Clearance		Per Conversation
	As Requested		For Correction		Prepare Reply
	Circulate		For Your Information		See Me
	Comment		Investigate		Signature
	Coordination		Justify		

REMARKS

SUBJECT: IBM Typewriter Maintenance

Please check over the attached list and make any corrections, additions, deletions necessary for your Branch. I have to turn this in to Don Toohey ASAP. Thanks.

DO NOT use this form as a RECORD of approvals, concurrences, disposals, clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)	Room No.—Bldg.
Eileen Hahnen Eileen	Phone No.

5041-102

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206

☆ U.S. GOVERNMENT PRINTING OFFICE : 1982 O - 361-529 (214)

(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R017b

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

RECEIVED

EPA I.D. NUMBER: F MAD 046 128559 D

LABEL ITEMS

I. EPA I.D. NUMBER: MAD046128559

III. FACILITY NAME: ATF-DAVIDSON COMPANY, INC.

V. FACILITY MAILING ADDRESS: MAIN STREET

PLEASE PLACE LABEL IN THIS SPACE

VI. FACILITY LOCATION: WHITINSVILLE, MASS. 01588

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold—faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	X		
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP ATF-DAVIDSON COMPANY, INC.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 ROSOL JOSEPH PLANT ENGINEER	617 234 7451

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 MAIN STREET

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 WHITINSVILLE	MA	01588

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 MAIN STREET

B. COUNTY NAME: WORCESTER

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 WHITINSVILLE	MA	01588	

CONTINUED FROM THE FRONT

VII. SIC CODES *(4-digit, in order of priority)*

A. FIRST	B. SECOND
3579 (specify) DUPLICATING MACHINES	(specify)

C. THIRD	D. FOURTH
3555 (specify) Printing Trades Machines and Equipment	(specify)

VIII. OPERATOR INFORMATION

A. NAME: ATF-DAVIDSON COMPANY, INC.

B. Is the name listed in Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR *(Enter the appropriate letter into the answer box; if "Other", specify.)*
F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC *(other than federal or state)*
O = OTHER *(specify)*

Answer: P (specify)

D. PHONE *(area code & no.)*: A 617 234 7451

E. STREET OR P.O. BOX: MAIN STREET

F. CITY OR TOWN: WHITINSVILLE

G. STATE: MA

H. ZIP CODE: 01588

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES *(Discharges to Surface Water)*	N	MA001252	
B. UIC *(Underground Injection of Fluids)*	U	NA	
C. RCRA *(Hazardous Wastes)*	R	NA	
D. PSD *(Air Emissions from Proposed Sources)*	P	NA	
E. OTHER *(specify)*		NA	(specify)
E. OTHER *(specify)*		NA	(specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS *(provide a brief description)*

MANUFACTURE OF DUPLICATING AND OFFSET PRINTING PRESSES

XIII. CERTIFICATION *(see instructions)*

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE *(type or print)*	B. SIGNATURE	C. DATE SIGNED
RICHARD C. BRYANT PRESIDENT	Richard C. Bryant	10/31/80

COMMENTS FOR OFFICIAL USE ONLY

(fill–in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U[illegible]NMENTAL PROTECTION AGENCY

HAZA[illegible] WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

EPA I.D. NUMBER

S													T/A	C
F	M	A	D	0	4	6	1	2	8	5	5	9		1

1 2 - 13 14 15

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 71 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 71 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	7 1	1 2	1 4
15	73 74	75 76	77 78

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY
73 74	75 76	77 78

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[X] 72 1. FACILITY HAS INTERIM STATUS

[ ] 72 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S		T/A	C
C	DUP		1

1 2 - 13 14 15

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
	16 - 18	19 - 27	28	29 - 32		16 - 18	19 - 27	28	29 - 32
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	2200	G		7				
2	S 0 2	2000	G		8				
3	T 0 1	5000	U		9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR R DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non—listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non—listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non—listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K054	900	P	T03 D80	
X-2	D002	400	P	T03 D80	
X-3	D001	100	P	T03 D80	
X-4	D002				included with above

 CONTINUE ON PAGE 3

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS W[illegible]ES [illegible]inued)

E. USE THIS SPACE TO LIST ADDITIONAL [illegible]ESS CODES FROM ITEM D(1) ON PAGE [illegible]

EPA I.D. NO. *(enter from page 1)*													
S	F	M	A	D	0	4	6	1	2	8	5	5	9	T/A	C
															6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail)*.

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail)*.

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
42 06 38	71 40

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*
E WHITE CONSOLIDATED INDUSTRIES, INC.	216-252-3700

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 11770 BEREA ROAD	G CLEVELAND	OH	44111

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
John B. Schulze	[signature]	11/19/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
RICHARD C. BRYAN	[signature]	10/31/80

CONTINUE ON PAGE 5

Continued from page 2.
NOTE: Photocopy this page before completing more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
WMAD046128559 T/A 1 C	W DUP T/A 2 C DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F001	6000	P	S01				
2	F003	3000	P	S01				
3	F005	1200	P	S01				
4	F006	2400	P	T01	S01			
5	F007	1000	P	T01	S01			
6	F008	1000	P	T01	S01			
7	F009	2000	P	T01	S01			
8	F010	200	P	S01				
9	F011	4000	P	S01				
10	F017	300	G	S01				
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								

CONTINUE ON REVERSE

3/2/79 two town wells on Whitins Pond have a combined yield of 2 MGD, the pond is used as an indirect surface water supply

File No. 1030

QUESTIONNAIRE ON MASSACHUSETTS SURFACE IMPOUNDMENTS

NOTES:

1. The form is designed to be easy to fill out. Most of the questions are multiple choice. We do not intend this to be a research project for you. We would prefer to receive partially completed forms rather than delay the mailing. Items 1-7 are most critical.

2. Even though an impoundment is now closed or is soon to be closed, it may still pose a very serious hazard. Please complete the form for closed sites as well as active ones.

3. This study must be completed by mid-spring time. We would appreciate it very much if you would mail back this form before MAR 2 1979. so that we can avoid spending the time and tax money required for follow-up phone calls.

4. The red file number on the upper right hand corner of this form corresponds to the red file number beside the site on the attached map. This is especially important if you have received a single map sheet containing several sites and several attached forms.

5. If you are not the person in your municipality to whom this questionnaire should have been directed, please pass it on to the appropriate person.

---

1. Who is completing this form? Name DELWYN K. BARNES Phone 617-234-7358

Street 44 LAKE ST Town & State WHITINSVILLE, MA Zip 01588

2. Please examine the enclosed map: Who is the owner of the land on which this site occurs?

Name A T F DAVIDSON CO. Street MAIN ST

Town & State WHITINSVILLE, MA Zip 01588 Phone 617-234-7451

3. If other than above, who is the principal operator of the site?

Name Street

Town & State Zip Phone

4. What kind of facility is this? (plastics, sewage treatment etc.?) FLY ASH

---

5. Where does the water come from for your municipality? (check appropriate boxes)

- ☐ Primarily individual wells or private withdrawal from surface water.
- ☑ Public Wells (How many are operating at least part of the year? 151)
- ☑ Public Reservoir (Name(s) (WHITINS POND) MEADOW POND, STOCK POND, CARPENTER RESERVOIR, & RESERVOIRS No.s 4, 5, + 6 (indirectly))
- ☐ River (Name(s))
- ☐ Our water is purchased out of town. (Where)

6. About how many houses are connected to public water? 2500 ±

7. Now, please look at the accompanying map. If any of your sources of public water fall on the map, please do the following:

A. If public supply wells are located within the area of the map, place a cross (+) at each, and put a (W) beside the cross. Also (if you can provide the information without holding up the mailing of this form) write the rated capacity of the well in gallons per day (GPD) beside each cross. It is important to plot these crosses precisely.

B. If lakes or reservoirs are used for public water, place an (S) (for surface water) on the water body. If the pumping station appears on the map, place a (P) at its site.

C. If rivers are used for public water, place an (R) on the river. If it is also on the map, place a (P) at the pumping station.

(Over please)

8. Soil conditions near the impoundments: If you can answer these questions without holding up the mailing of this questionnaire we would like to have an idea of the soil conditions near the impoundments. Are any of the following true?

- ☐ The impoundment is an old gravel pit.
- ☐ There are a number of nearby gravel pits.
- ☑ The vicinity is mostly ledge, marl or clay.
- ☐ The bottom of the impoundment has been sealed with ☐ Plastic Film ☐ Clay ☐ Some other treatment (name if known_____).

If, for any reason, you have further knowledge of the soil conditions, please write us a note in the Any More Comments? section at the end.

9. What sort of waste is entering the impoundment?

- ☐ Sewage or sewage sludge
- ☐ Plastics industry solvents
- ☐ Tannery solutions
- ☐ Pickling baths
- ☐ Fire protection pond
- ☐ Petroleum Waste
- ☐ Dry cleaning wastes
- ☐ Metal plating baths
- ☐ Unadulterated cooling water
- ☐ Not Known
- ☐ Your photo interpreter was drunk, it's only a natural pond in an old gravel pit
- ☐ Other (type if possible FLY ASH)

10. Has your community had environmental problems with this impoundment? ☐ Yes ☑ No
If Yes, please make any comments below which you feel might be pertinent to our study.

11. Do you know if any of the following are true?

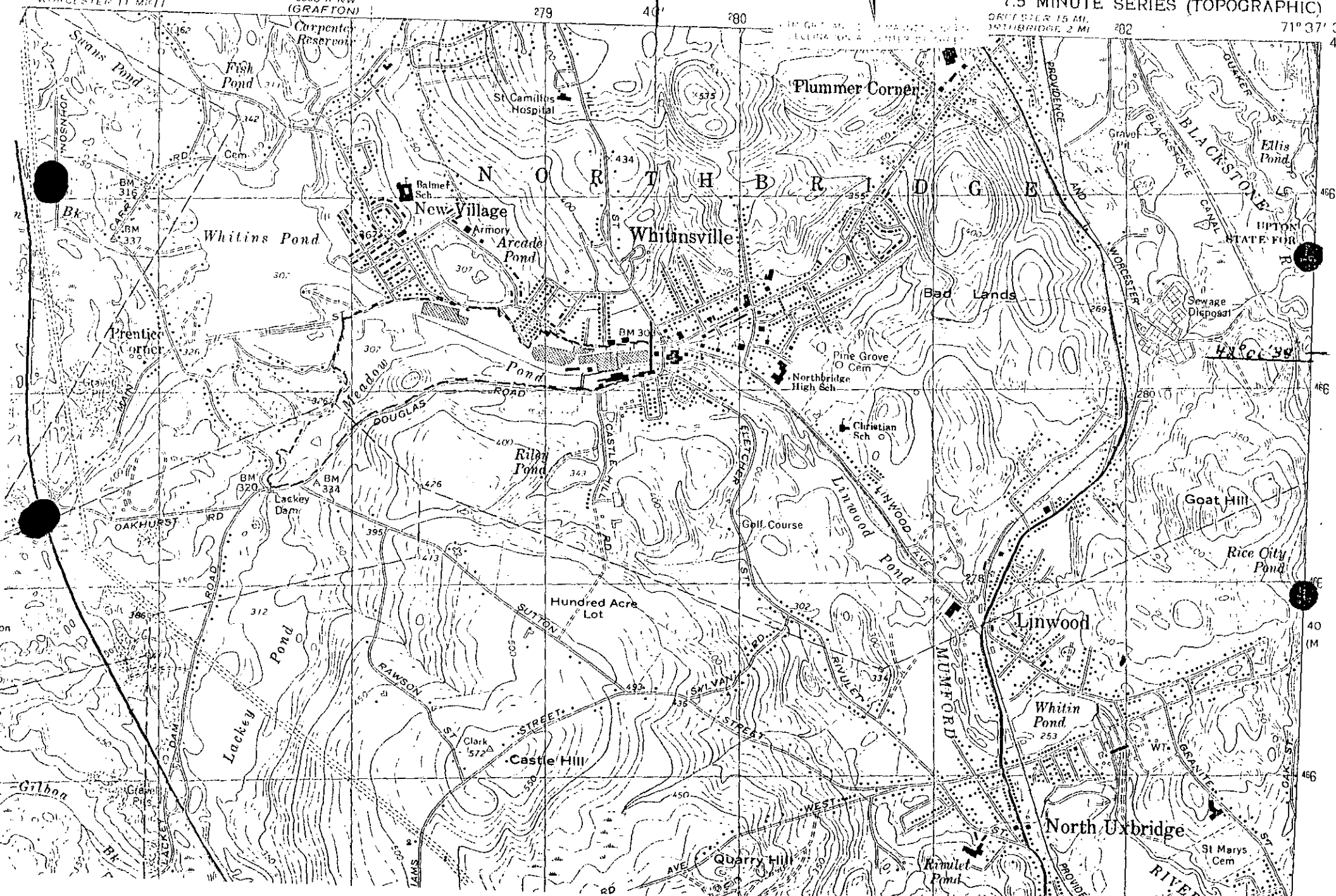
- ☑ The site is being or has been abandoned as an impoundment
- ☐ There are monitoring wells present at the site
- ☐ There are interceptor wells or other means currently being employed at the site to inhibit migration of contaminants from the site into the groundwater.

12. Any More Comments?

Has been abandoned for many years.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC WORKS

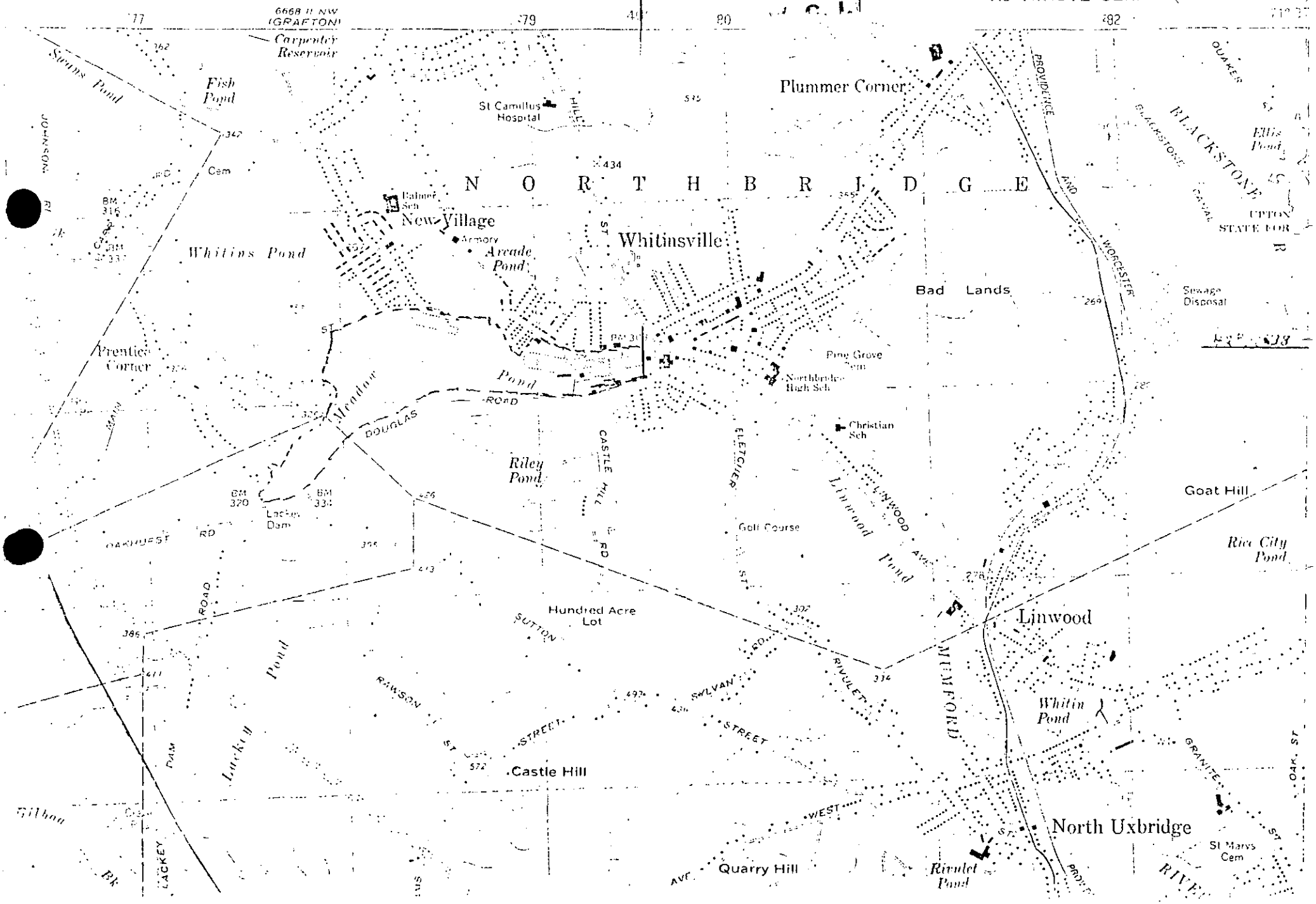
UXBRIDGE QUADRANGLE
MASSACHUSETTS–RHODE ISLAND
7.5 MINUTE SERIES (TOPOGRAPHIC)

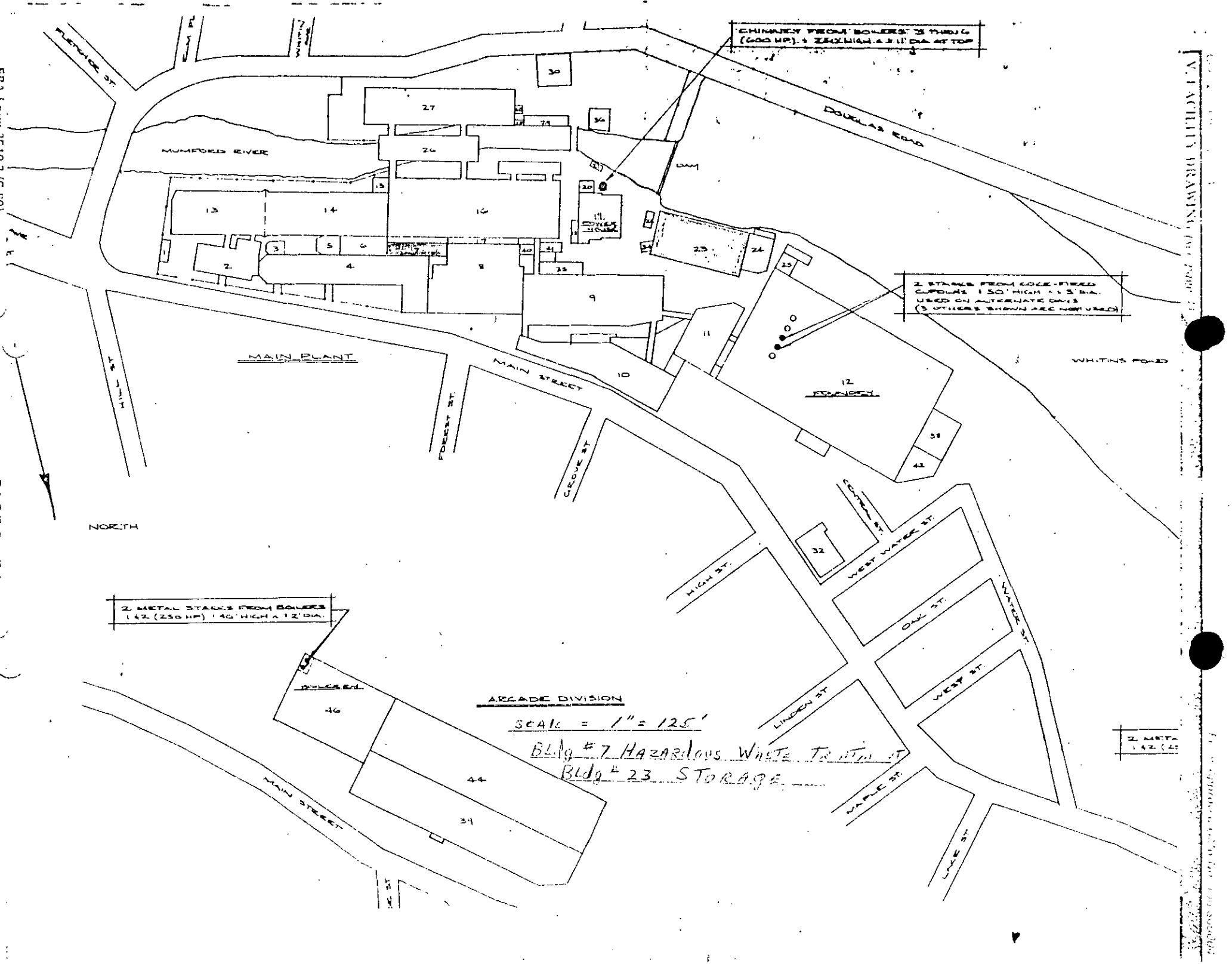


COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF PUBLIC WORKS

UXBRIDGE QUADRANGLE
MASSACHUSETTS–RHODE ISLAND
7.5 MINUTE SERIES (TOPOGRAPHIC)

71° 40' 00'
RECEIVED
SEP 24 1980





EPA Form 3510-3 (6-80)

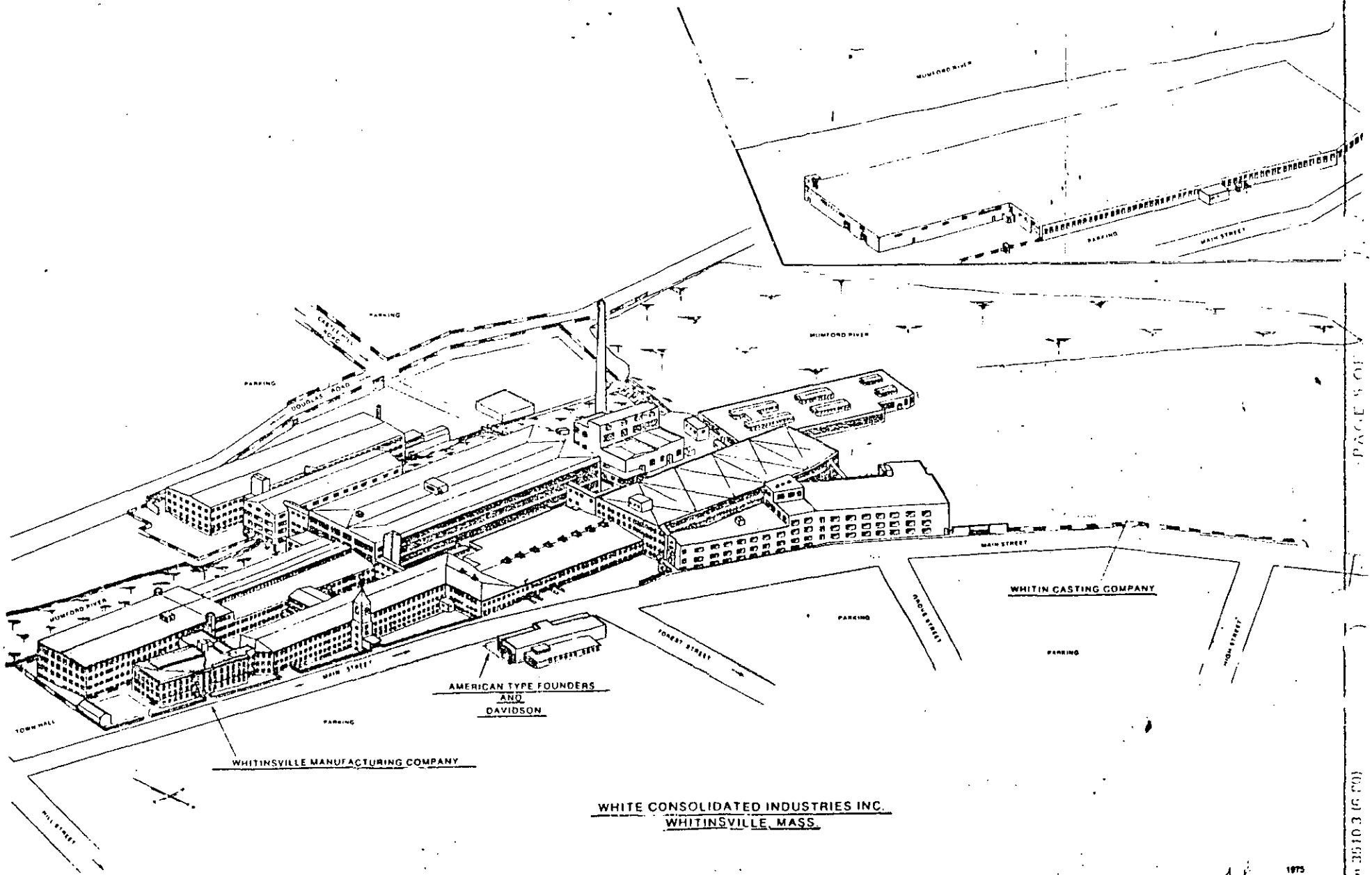
PAGE 5 OF 5

V. FACILITY DRAWING

Form Approved OMB No. 155 S80004

Continued from page 4

V. FACILITY DRAWING

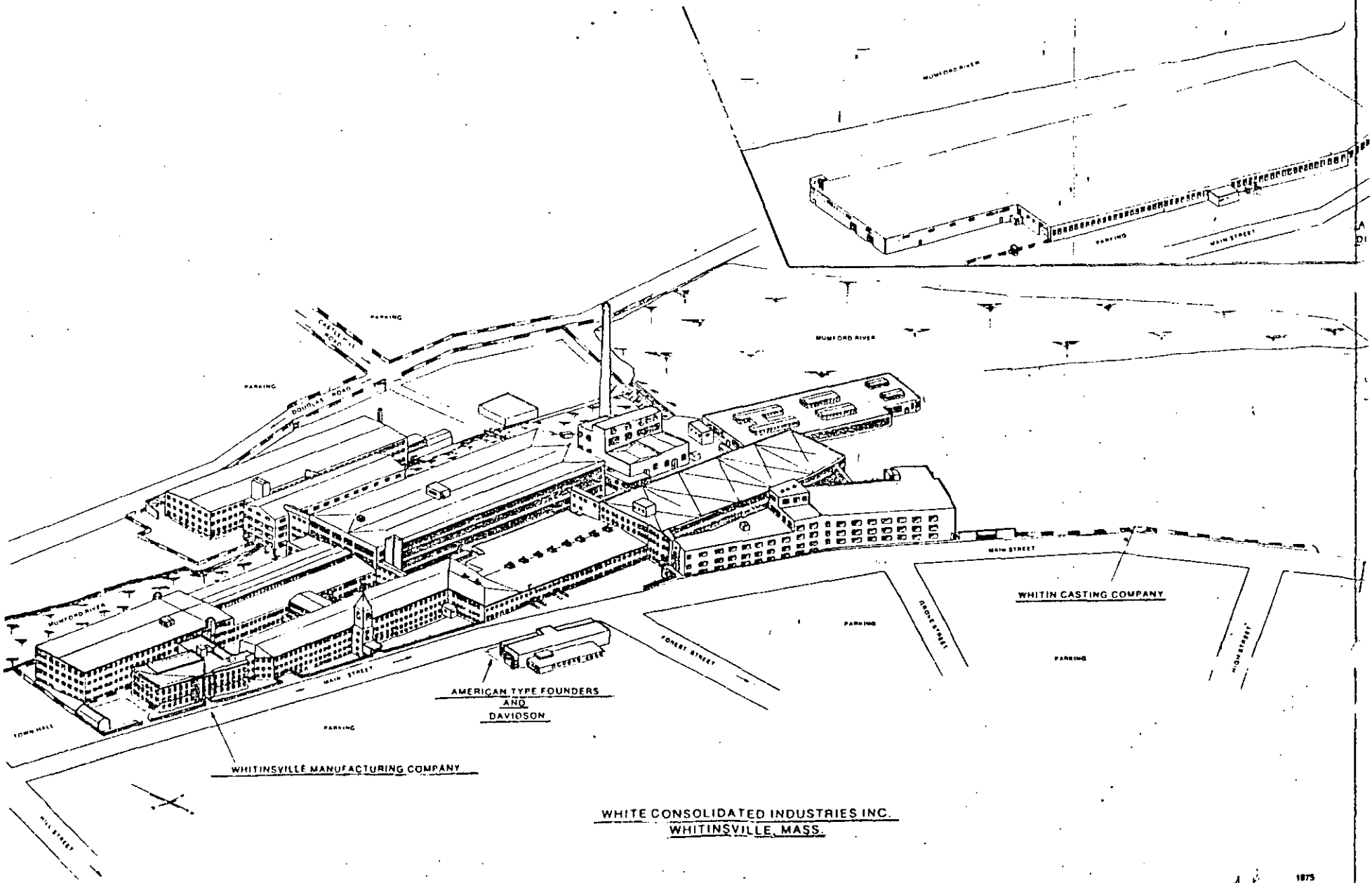


WHITE CONSOLIDATED INDUSTRIES INC.
WHITINSVILLE, MASS.

1975

EPA Form 3510-3 (6-79)

Form Approved OMB No. 1024-0018

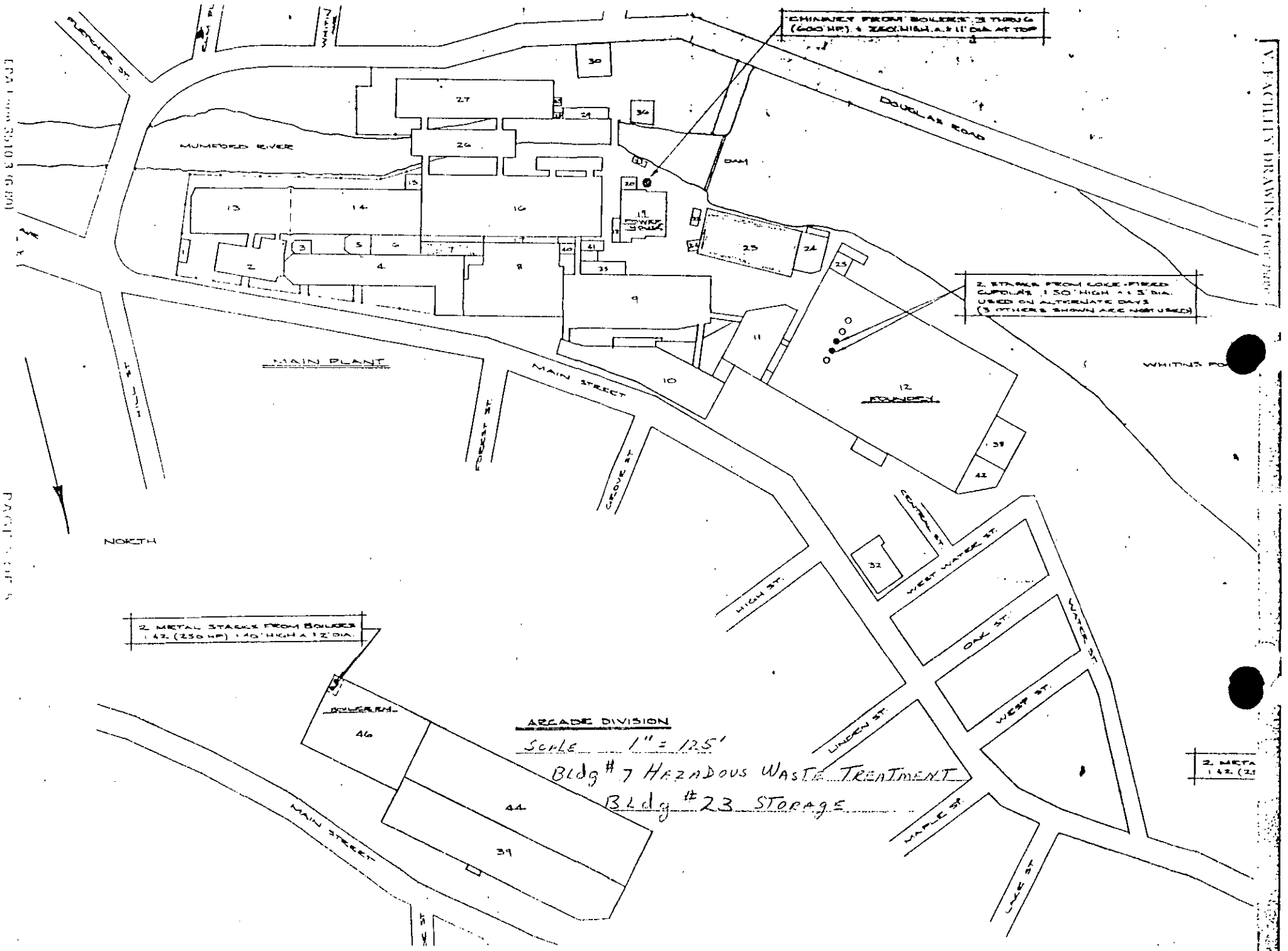


WHITE CONSOLIDATED INDUSTRIES INC.
WHITINSVILLE, MASS.

1975

Continued from page 4

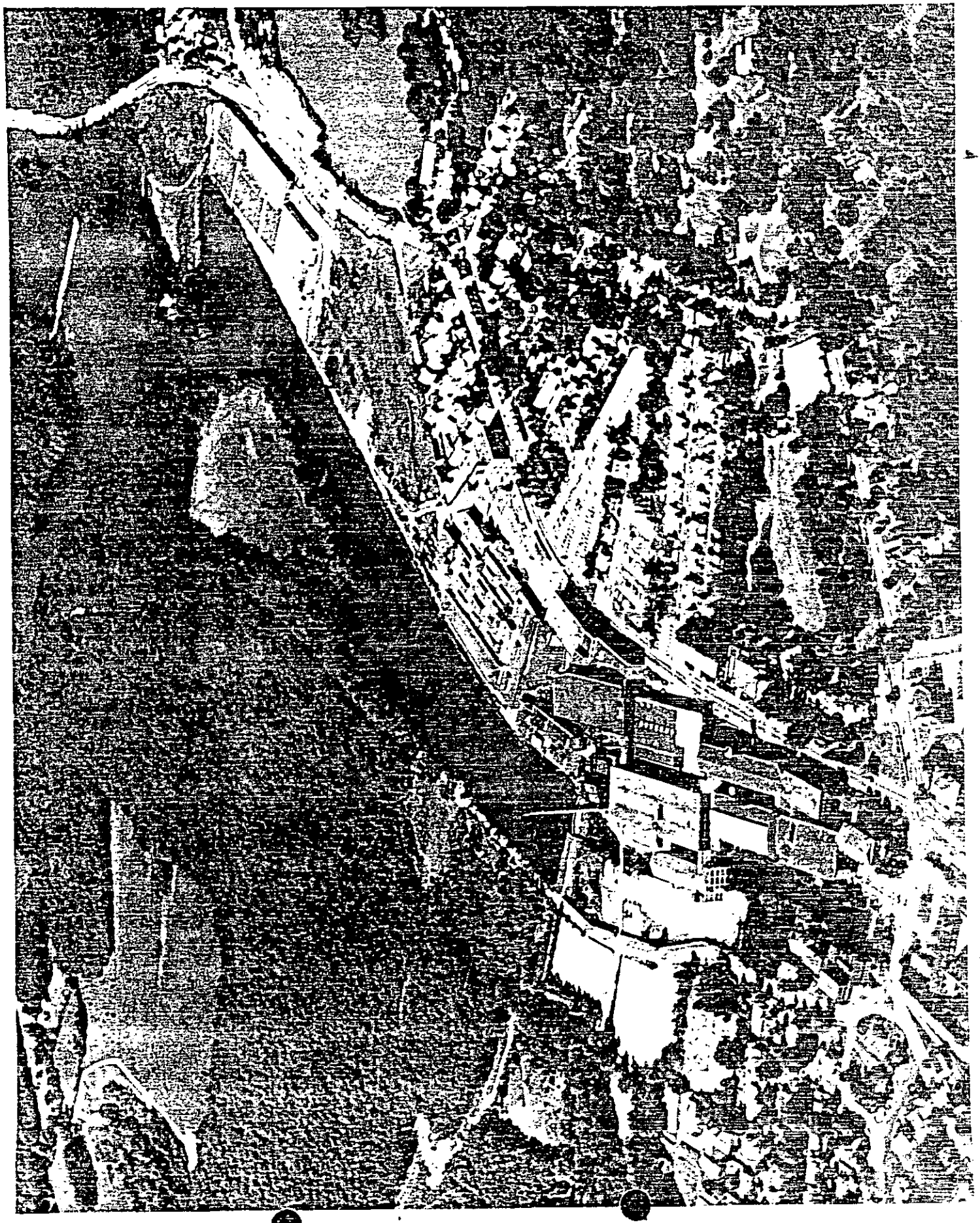
V. FACILITY DRAWING (or Photo)



V. FACILITY DRAWING, PLOT PLAN

EPA Form 3510-3 (6-80)

PAGE 3 OF 5



(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

FORM 1 GENERAL

EPA

ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

RECEIVED

EPA I.D. NUMBER: F MAD 046 128 559 3 D

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent *(this area to the left of the label space lists the information that should appear)*, please provide it in the proper fill-in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER	MAD046128559
III. FACILITY NAME	ATF-DAVIDSON COMPANY, INC.
V. FACILITY MAILING ADDRESS	MAIN STREET
	PLEASE PLACE LABEL IN THIS SPACE
VI. FACILITY LOCATION	WHITINSVILLE, MASS. 01588

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP ATF-DAVIDSON COMPANY, INC.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 ROSOL JOSEPH PLANT ENGINEER	617 234 7451

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 MAIN STREET

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 WHITINSVILLE	MA	01588

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 MAIN STREET

B. COUNTY NAME: WORCESTER

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 WHITINSVILLE	MA	01588	

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
7 3579 (specify) DUPLICATING MACHINES	7 (specify)
C. THIRD	**D. FOURTH**
7 3555 (specify) Printing Trades Machines and Equipment	7 (specify)

VIII. OPERATOR INFORMATION

A. NAME: 8 ATF-DAVIDSON COMPANY, INC.

B. Is the name listed Item VIII-A also the owner? ☐ YES ☒ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL
S = STATE
P = PRIVATE
M = PUBLIC (other than federal or state)
O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 617 234 7451

E. STREET OR P.O. BOX: MAIN STREET

F. CITY OR TOWN: B WHITINSVILLE

G. STATE: MA

H. ZIP CODE: 01588

IX. INDIAN LAND
Is the facility located on Indian lands? ☐ YES ☒ NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N MA001252

D. PSD (Air Emissions from Proposed Sources): 9 P ~~N/A~~

B. UIC (Underground Injection of Fluids): 9 U ~~N/A~~

E. OTHER (specify): 9 ~~N/A~~ (specify)

C. RCRA (Hazardous Wastes): 9 R ~~N/A~~

E. OTHER (specify): 9 ~~N/A~~ (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

F9:A150

XII. NATURE OF BUSINESS (provide a brief description)

MANUFACTURE OF DUPLICATING AND OFFSET PRINTING PRESSES

F9:A151

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
RICHARD C. BRYANT PRESIDENT	[signature]	10/31/80

COMMENTS FOR OFFICIAL USE ONLY

C

(Print or type in areas are spaced for elite type, i.e., 12 characters/inch). Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U[redacted]RONMENTAL PROTECTION AGENCY
HAZA[redacted]S WASTE PERMIT APPLICATION[redacted]
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F	M	A	D	0	4	6	1	2	8	5	5	9	2

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	71	12	14

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. **PROCESS CODE** — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. **PROCESS DESIGN CAPACITY** — For each code entered in column A enter the capacity of the process.
1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. 1. AMOUNT	B. 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
~~X-1~~	~~S02~~	~~600~~	~~G~~		5				
~~X-2~~	~~T03~~	~~20~~	~~E~~		6				
1	S01	2200000	G		7				
2	S02	2000000	G		8				
3	T01	5000000	U		9				
4					10				

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE
W M A D 0 4 6 1 2 8 5 5 9 T/A 2 C 1	W DUP T/A 2 C DUP

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F001	6000 000	P	S01				
2	F003	3000 000	P	S01				
3	F005	1200 000	P	S01				
4	F006	2400 000	P	T01	S01			
5	F007	1000 000	P	T01	S01			
6	F008	1000 000	P	T01	S01			
7	F009	2000 000	P	T01	S01			
8	F010	200 000	P	S01				
9	F011	4000 000	P	S01				
10	F017	2508000	P	S01				
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								

IV. DESCRIPTION OF HAZARDOUS W[illegible] (Continued)

E. USE THIS SPACE TO LIST ADDITI[illegible] CCESS CODES FROM ITEM D(1) ON [illegible]

EPA I.D. NO. (enter from page 1)													
F	M	A	D	0	4	6	1	2	8	5	5	9	3 6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* Fig: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* Fig: A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
~~4 2 0 6 3 8~~	~~7 3 4 0~~

VIII. FACILITY OWNER

☐ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
E WHITE CONSOLIDATED INDUSTRIES, INC.	216-252-370

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
F 11770 BEREA ROAD	G CLEVELAND	OH	44111

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
John B. Schulze	[signature]	11/19/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Richard C. Bryan	[signature]	10/31/80

DATE PREPARED

MONTH	DAY	YEAR
3	27	79
75 76	77 78	79 80

U.S. ENVIRONMENTAL PROTECTION AGENC

SURFACE IMPOUNDMENT ASSESSMENT (S

OPERATIONAL FEATURES OF THE IMPOUNDMENT AND GROUND-WATE

SECTION II

INSTRUCTIONS: This form is to be completed for one impoundment per site *(facility)* identified in Section I, impoundment per site selected via random sampling procedures. Complete multiple choice questions by ente

I. FACILITY IDENTIFICATION

STATE	CNTY./CITY	PLACE	CATEGORY	SIA SITE NUMBER	IMPOUNDMENT NO.
25	027	79495	AIV	00001	1
1 2	3 – 5	6 – 10	11 – 13	14 – 18	19 – 21	22

III. IMPOUNDMENT DESCRIPTION

Age of impoundment in years.	b. IS IMPOUNDMENT PRESENTLY USED? 1. Yes 2. NO	c. If answer to III.b is 'yes', give no. of years in operation.	d. If answer to III.b is 'no', give last year of operation.	e. Surface area of impoundment. *(in acres)*	f. Surface area of all impoundmen at this site *(in acres)*.
	2		1950		
35 36	37	38 39	40 – 43	44 – 49	50 –

POND HAS BEEN FILLED AND IS NOW A PARKING LOT

III. IMPOUNDMENT DESCRIPTION *(Continued*

. Average effluent for this impoundment *(gallons per day and year of record)*.		i. Average daily influent for all impoundments at this facility *(gallons p of record)*.	
ALS./DAY	YEAR OF RECORD	GALS./DAY	YEAR OF RECORD
36 – 44	45 – 48	49 – 57	58

III. IMPOUNDMENT DESCRIPTION *(Continued)*

. TYPE OF BOTTOM LINER *(Enter no. from the types listed into blocks 23 and 24.)*
IF CLAY LINER NO. 2,3 OR 4 IS SELECTED, GIVE THICKNESS IN INCHES *(Enter in blocks 25 thru 27.)*

1. None
2. Clay
3. Bentonite Modifi-
04. Chemically Modified Clay
05. Concrete
06. Asphalt
07. Metal
08. Polyethylene
09. Plasticized PVC
10. Butyl Rubber Sheeting
11. Hypalon Sheeting
12. Ethylene Propylene
13. Chlorinated Polyethylene
14. Other Membrane type *(Specify in blks.*
15. Other *(Specify in blocks 28 thru 39.)*

3				
22	23 24	25 – 27	28 – 39	

IV. GROUND-WATER MONITORING

ber of monitoring wells associated with this pound *(if '0' ter and go to ation V.b.)*.	b. FREQUENCY OF GROUND-WATER QUALITY SAMPLING FROM MONITORING WELLS.	a. HAVE SIGNIFICANT CHANGES IN GROUND-WATER QUAL OBSERVED IN ANALYSIS FROM MONITORING WELLS? *(If and describe below how the site was corrected.)*
	1. None 4. Monthly 7. Yearly 2. Daily 5. Quarterly 8. Other *(Specify in blocks 50 thru 61.)* 3. Weekly 6. Semi-Annually	1. Yes 2. No 3. Unknown 4. Not A EXPLAIN:
47 48	49 50 – 61	62

VI. RATING OF THE GROUND-WATER CONTAMINATION POTENTIAL *(See instruction ma*

	STEP 1		STEP 2		STEP 3		STEP 4		STEP 5	
	UNSAT. ZONE	CONFIDENCE	G.W. AVAIL.	CONFIDENCE	G.W. QUAL.	CONFIDENCE	WASTE	CONFIDENCE	G.W. CONTAM. POTENTIAL	H
4	~~2E~~	1	1E	C	5	C	5	C	20	
22	23 24	25	26 27	28	29	30	31	32	33 34	

A Form 7500-4A (5-78)

Whitinsville (Northbridge) 1030

FORM APPROVED
OMB NO. 158-S78004

DATE PREPARED			
MONTH	DAY	YEAR	
3	27	79	
75 76	77 78	79 80	

U.S. ENVIRONMENTAL PROTECTION AGENCY
SURFACE IMPOUNDMENT ASSESSMENT (SIA)
LOCATION AND COUNT OF IMPOUNDMENTS
SECTION I

(1) Imp. - Now Parking lot formerly fish pond
(1) Imp. National Pond.

SERIAL NUMBER
SIA OFFICE ONLY
9 western SIC

AIN

FACILITY IDENTIFICATION									
STATE	CNTY./CITY	PLACE	CATEGORY	SIA SITE NUMBER					
25	027	794495	~~IND~~					1	
1 2	3 - 5	6 - 10	11 - 13	14 - 18				22	

How many impoundments are located at this site? (1) ~~[illegible]~~ 23 - 25

STATE IDENTIFICATION NO. (Optional): ~~[illegible]~~ 200 - 216 - 0113 - 37

NPDES NUMBER	STANDARD INDUSTRIAL CLASSIFICATION (SIC Code)	SITE LOCATION	
	34	LATITUDE (DEGREES, MINUTES, SECONDS): 42 07 00	LONGITUDE (DEGREES, MINUTES, SECONDS): 71 40 39
38 - 46	47 - 50	51 52 53 54 55 56	57 59 60 61 62 63

OWNER

NAME OF OWNER

2 ATF DAVIDSON CO

22 - 59

OWNER'S MAILING ADDRESS (Street No. or P.O. Box)

3 MAIN ST.

22 - 59

CITY OR TOWN	STATE	ZIP CODE
4 WHITINSVILLE	MA	01588
22 - 52	53 54	55 - 59

OPERATOR

NAME OF OPERATOR

5 SAME

22 - 59

OPERATOR'S MAILING ADDRESS (Street No. or P.O. Box)

6 SAME

22 - 59

CITY OR TOWN	STATE	ZIP CODE
7 SAME		
22 - 52	53 54	55 - 59

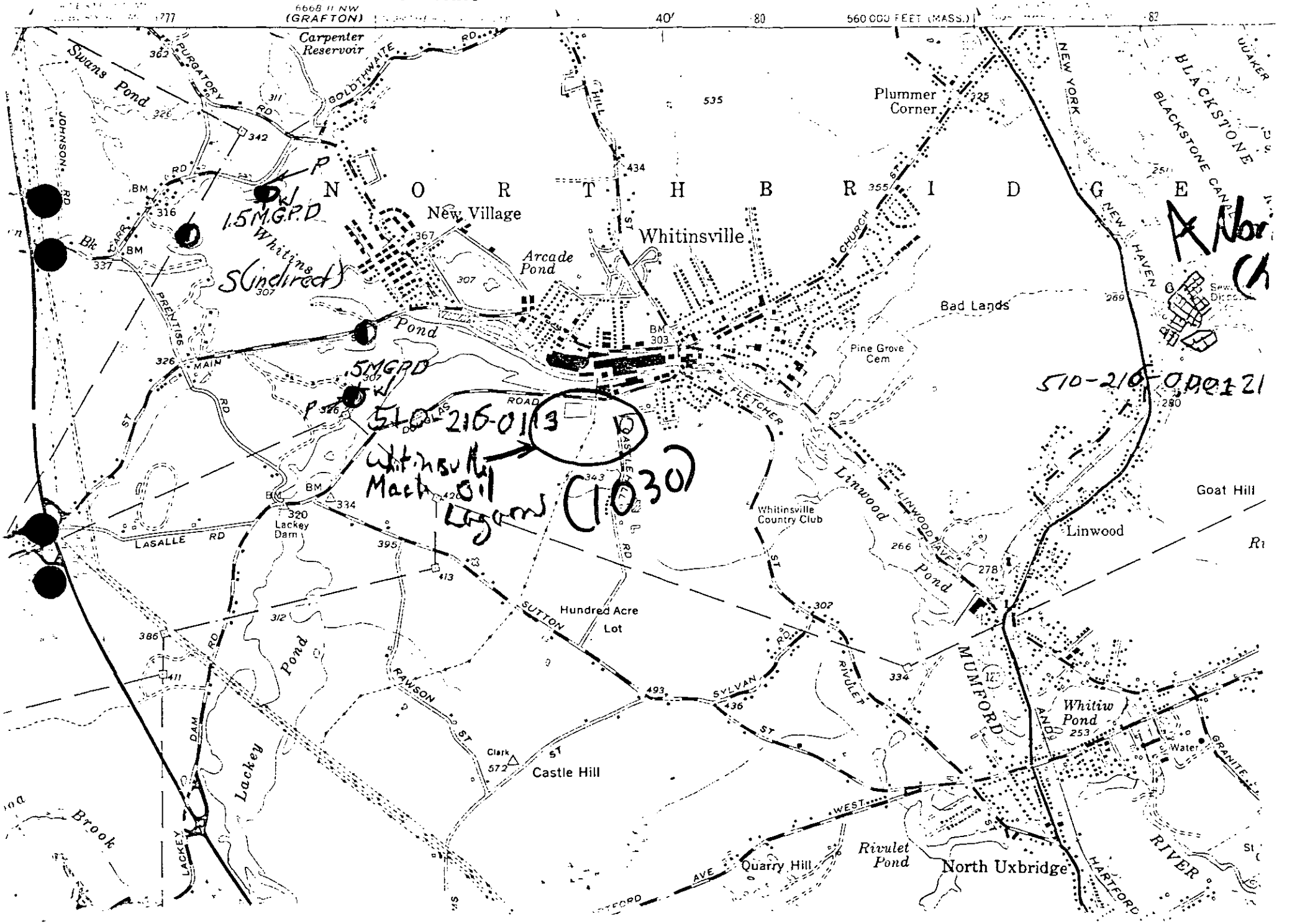
EPA Form 7500-44 (6-78)

EPA COPY

AREA I Uxbridge

STATE OF MASSACHUSETTS
DEPARTMENT OF PUBLIC WORKS

UXBRIDGE QUADRANGLE
MASSACHUSETTS—RHODE ISLAND
7.5 MINUTE SERIES (TOPOGRAPHIC)



NAME/ADDRESS (Include Location, if different)
ATR DAVIDSON COMPANY
ADDRESS MAIN STREET
WHITINSVILLE MA 01588

FACILITY
LOCATION
[illegible] PLANT METAL[illegible]

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2000-0015

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER
MA0001252	001 A

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	92	09	01	TO	92	09	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
[illegible] 1 0 [illegible]	SAMPLE MEASUREMENT	4753	9525	LBS	******	******	******	******			
	PERMIT REQUIREMENT	****** 30DA AVG	****** DAILY MX		******	******	******	******		CONTI-NUOUS	RCOR
[illegible] 0 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	1.0	******	7.5	SU			
	PERMIT REQUIREMENT	******	******	******	6.0 MINIMUM	******	9.0 MAXIMUM			CONTI-NUOUS	
[illegible], TOTAL (AS CU) 0720 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	---	0.01	MG/L			
	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX			ONCE/MONTH	COMPO
[illegible], FREE (AMN[illegible] [illegible]) 722 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	---	0.01	MG/L			
	PERMIT REQUIREMENT	******	******	******	******	.05 DAILY AV	.1 DAILY MX			ONCE/MONTH	COMPO
[illegible], TOTAL (AS CU) 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	---	0.005	MG/L			
	PERMIT REQUIREMENT	******	******	******	******	.2 DAILY AV	.2 DAILY MX			ONCE/MONTH	COMPO
[illegible], HEXAVALENT (AS CR) 1032 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	---	0.005	MG/L			
	PERMIT REQUIREMENT	******	******	******	******	.05 DAILY AV	.1 DAILY MX			ONCE/MONTH	COMPO
[illegible], TOTAL (AS CR) 1034 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	---	0.05	MG/L			
	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX			ONCE/MONTH	COMPO

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE	DATE
TYPED OR PRINTED	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE / NUMBER	YEAR / MO / DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*
[illegible] TREATMENT [illegible] FOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME: ATF-DAVIDSON COMPANY

ADDRESS: MAIN STREET
WHITINSVILLE MA 01588

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2000-0015

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER
MA0001252	001 A

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	09	01	TO	82	09	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
COPPER, TOTAL (AS CU)	SAMPLE MEASUREMENT	******	******	******	******	---	0.30				
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	MG/L		ONCE/MONTH	COMPOS
[illegible] (AS Zn)	SAMPLE MEASUREMENT	******	******	******	******	---	1.18				
[illegible]	PERMIT REQUIREMENT	******	******	******	******	2.0 DAILY AV	2.0 DAILY MX	MG/L		ONCE/MONTH	COMPOS
[illegible]	SAMPLE MEASUREMENT	******	******	******	******		0.080				
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	MG/L		ONCE/MONTH	COMPOS
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Ernest Baillargeon
Vice-President

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

Daniel Marques
Facilities & Energy Mgr.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
AREA CODE	NUMBER	YEAR	MO	DAY
617	234-7451	82	10	19

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*
[illegible] PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2000-0015

COMPANY
[illegible]
[illegible]NSVILLE MA 01588
[illegible]ILITY
LOCATION
[illegible] AKRON, PLANT SUPERINTENDENT

(2-16) MA0001252 — PERMIT NUMBER

(17-19) 001 A — DISCHARGE NUMBER

E - FINAL LIMITS
TREATMENT PLANT EFFLUENT

file copy

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	92	08	01	TO	92	08	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) (46-53) QUANTITY OR LOADING (54-61) AVERAGE	MAXIMUM	UNITS	(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) MINIMUM	(54-61) AVERAGE	MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
[illegible]	SAMPLE MEASUREMENT	3,671	7,500		******	******	******	******			
[illegible] 1 0 [illegible]	PERMIT REQUIREMENT	****** 30DA AVG	****** DAILY MX	LBS	******	******	******	******		CONTINUOUS	[illegible]
[illegible]	SAMPLE MEASUREMENT	******	******	******	6.0	******	10.6				
[illegible] 1 0 [illegible]	PERMIT REQUIREMENT	******	******	******	6.0 MINIMUM	******	9.5 MAXIMUM	SU		CONTINUOUS	
[illegible], TOTAL (AS CN) [illegible] 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	< 0.01	—				
	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	MG/L		UNCE/MONTH	COMPOS
[illegible], FREE (AS [illegible]) [illegible] 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	0.0	—				
	PERMIT REQUIREMENT	******	******	******	******	.05 DAILY AV	.1 DAILY MX	MG/L		UNCE/MONTH	COMPOS
[illegible], TOTAL (AS CR) [illegible] 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	0.103	—				
	PERMIT REQUIREMENT	******	******	******	******	.2 DAILY AV	.4 DAILY MX	MG/L		UNCE/MONTH	COMPOS
[illegible], HEXAVALENT (AS CR) 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	< 0.005					
	PERMIT REQUIREMENT	******	******	******	******	.05 DAILY AV	.1 DAILY MX	MG/L		UNCE/MONTH	COMPOS
[illegible], TOTAL (AS CU) [illegible] 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	0.09	—				
	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	MG/L		UNCE/MONTH	COMPOS

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*		TELEPHONE		DATE		
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)* [illegible] FOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME: ATF DAVIDSON COMPANY

ADDRESS: MAIN STREET
WHITINSVILLE MA 01588

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2000-0015

PERMIT NUMBER (2-16)	DISCHARGE NUMBER (17-19)
MA0001252	001 A

F - FINAL EFFLUENT
TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	[illegible]	08	01	TO	[illegible]	[illegible]	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) (46-53) QUANTITY OR LOADING (54-61) AVERAGE	MAXIMUM	UNITS	(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
[illegible], TOTAL (AS CU) [illegible]	SAMPLE MEASUREMENT	******	******	******	******	0.47	—				
	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	MG/L		ONCE/MONTH	COMP
[illegible], TOTAL (AS [illegible]) [illegible]	SAMPLE MEASUREMENT	******	******	******	******	2.45	—				
	PERMIT REQUIREMENT	******	******	******	******	2.0 DAILY AV	2.0 DAILY MX	MG/L		ONCE/MONTH	COMP
[illegible], TOTAL (AS [illegible]) [illegible]	SAMPLE MEASUREMENT	******	******	******	******	0.610	—				
	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	MG/L		ONCE/MONTH	COMP
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE	DATE
Ernest Baillargeon Vice-President	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*	Daniel Marques Facilities & Energy Mgr.	617-234-7451	82 9 8
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE NUMBER	YEAR MO DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) [illegible] 10X DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME: RIE DAVIDSON COMPANY

ADDRESS: MAIN STREET
WHITINSVILLE MA 01588

FACILITY

LOCATION: [illegible], PLANT METALLURGIST

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2000-0015

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER
MA0001252	001 A

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

file copy

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	07	01	TO	82	07	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
[illegible]	SAMPLE MEASUREMENT	0	0		******	******	******	******			
[illegible]	PERMIT REQUIREMENT	****** 30DA AVG	****** DAILY MX	[illegible]	******	******	******	******		CONTI MONS	COMPOS
[illegible]	SAMPLE MEASUREMENT	******	******	******		******					
[illegible]	PERMIT REQUIREMENT	******	******	******	10.0 MINIMUM	******	9.5 MAXIMUM	SU		CONTI MONS	
[illegible]	SAMPLE MEASUREMENT	******	******	******	******						
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	MG/L		UNCE/ FOUR	COMPOS
[illegible]	SAMPLE MEASUREMENT	******	******	******	******						
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.05 DAILY AV	.1 DAILY MX	MG/L		UNCE/ FOUR	COMPOS
[illegible]	SAMPLE MEASUREMENT	******	******	******	******						
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.2 DAILY AV	.2 DAILY MX	MG/L		UNCE/ FOUR	COMPOS
[illegible]	SAMPLE MEASUREMENT	******	******	******	******						
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.05 DAILY AV	.1 DAILY MX	MG/L		UNCE/ FOUR	COMPOS
[illegible]	SAMPLE MEASUREMENT	******	******	******	******						
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	MG/L		UNCE/ FOUR	COMPOS

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE		DATE		
Ernest Baillargeon Vice-President	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*	Daniel Marques Facilites&Energy Mgr.	617	234-7451	82	8	30
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (*Reference all attachments here*). [illegible] DUE TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

ADDRESS AIN STREET
WHITINSVILLE MA 01588

FACILITY

LOCATION

PERMIT NUMBER

DISCHARGE NUMBER

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	07	01	TO	82	07	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
[illegible]	SAMPLE MEASUREMENT	******	******	******	******						
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	mg/l		ONCE/ MONTH	CONP
[illegible]	SAMPLE MEASUREMENT	******	******	******	******						
[illegible]	PERMIT REQUIREMENT	******	******	******	******	2.0 DAILY AV	2.0 DAILY MX	mg/l		ONCE/ MONTH	CONP
[illegible]	SAMPLE MEASUREMENT	******	******	******	******						
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	mg/l		ONCE/ MONTH	CONP
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE		DATE		
Ernest Baillargeon Vice-President	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*	Daniel Marques Facilities & Energy Mgr SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	617	234-7451	82		30
TYPED OR PRINTED		AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*. [illegible] DIRECTION.
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME: ZIP DAVIDSON COMPANY

ADDRESS: MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

[illegible] AKERS, PLANT METALLURGIST

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2000-0015

(2-16) PERMIT NUMBER: MA0001257

(17-19) DISCHARGE NUMBER: 001 A

F - FINAL EFFLUENT TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	06	01	TO	82	06	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

file copy

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
FLOW, GALS	SAMPLE MEASUREMENT	3,664	5,400	MGD	******	******	******	******			
00 6 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	****** 30DA AVG	****** DAILY MX		******	******	******	******		CONTI NUOUS	RECORD
	SAMPLE MEASUREMENT	******	******	******	3.2	******	10.0				
00400 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	6.0 MINIMUM	******	9.5 MAXIMUM	SU		CONTI NUOUS	
ARSENIC, TOTAL (AS AS)	SAMPLE MEASUREMENT	******	******	******	******	---	<0.01				
00720 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	MG/L		ONCE/ MONTH	COMP
CADMIUM, TOTAL (AS CD)	SAMPLE MEASUREMENT	******	******	******	******	---	---				
01027 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05 DAILY AV	.1 DAILY MX	MG/L		ONCE/ MONTH	COMP
CADMIUM, TOTAL (AS CD)	SAMPLE MEASUREMENT	******	******	******	******	---	<0.005				
01027 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.2 DAILY AV	.2 DAILY MX	MG/L		ONCE/ MONTH	COMP
CHROMIUM, HEXAVALENT (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	---	<0.005				
01032 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05 DAILY AV	.1 DAILY MX	MG/L		ONCE/ MONTH	COMP
CHROMIUM, TOTAL (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	---	<0.05				
01034 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	MG/L		ONCE/ MONTH	COMP

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE		DATE		
Ernest Baillargeon Vice-President	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*	Daniel Marques Facilities & Energy Mgr	617-234-7451	82	7	09
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE / NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

[illegible] FOR TOX DILUTION.

REPORT DAILY RANGE & MEAN FOR PH.

NAME/ADDRESS (Include Location if different)
F DAVIDSON COMPANY
AIN STREET
WHITINSVILLE MA 01588

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2000-0015

(2-16) PERMIT NUMBER: MA0001252

(17-19) DISCHARGE NUMBER: 001 A

TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	[illegible]	06	01	TO	[illegible]	06	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
[illegible], Total (as Cu) 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	---	0.24	mg/L			
	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX			ONCE/MONTH	COMP
[illegible] Total (as Cl) 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	---	1.09	mg/L			
	PERMIT REQUIREMENT	******	******	******	******	2.0 DAILY AV	4.0 DAILY MX			ONCE/MONTH	COMP
[illegible], Total (as [illegible]) 1 1 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	---	0.120	mg/L			
	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX			ONCE/MONTH	COMP
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER			TELEPHONE		DATE		
Ernest Baillargeon Vice-President	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*	Daniel Marques Facilities&Energy Mgr.	617-234-7451		82	7	09
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (*Reference all attachments here*) [illegible] TO DIRECTION.
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME: ATF DAVIDSON COMPANY

ADDRESS: MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2000-0015

F - FINAL LIMITS

TREATMENT PLANT EFFLUENT

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER
MA0001257	001 A

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM			01	TO		12	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
[illegible]	SAMPLE MEASUREMENT	3.[illegible]	[illegible]		[illegible]	[illegible]					
	PERMIT REQUIREMENT	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]
[illegible]	SAMPLE MEASUREMENT	[illegible]	[illegible]		[illegible]		[illegible]				
	PERMIT REQUIREMENT	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]			[illegible]	
[illegible]	SAMPLE MEASUREMENT	[illegible]	[illegible]			[illegible]	[illegible]				
[illegible]	PERMIT REQUIREMENT	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
[illegible]	SAMPLE MEASUREMENT	[illegible]	[illegible]			[illegible]	[illegible]				
[illegible]	PERMIT REQUIREMENT	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
[illegible]	SAMPLE MEASUREMENT	[illegible]	[illegible]			[illegible]	[illegible]				
[illegible]	PERMIT REQUIREMENT	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
[illegible]	SAMPLE MEASUREMENT	[illegible]	[illegible]			[illegible]	[illegible]				
[illegible]	PERMIT REQUIREMENT	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
[illegible]	SAMPLE MEASUREMENT	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.05				
[illegible]	PERMIT REQUIREMENT	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]			[illegible]	[illegible]

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE		DATE		
Ernest Baillargeon Vice-President	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*	D. Marques Fac. & Energy Mgr. SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	617	234-7451	92	5	2
TYPED OR PRINTED			AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here). [illegible] & TH [illegible]

REPORT DAILY RANGE & MEAN FOR PH.

Facility Name/Location (if different)

NAME: THE DAVIDSON COMPANY

ADDRESS: MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION: [illegible] AKERS, PLANT METALLURGIST

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2000-0015

PERMIT NUMBER (2-16)	DISCHARGE NUMBER (17-19)
MA0001252	001 A

F - FINAL EFFLUENT

TREATMENT PLANT EFFLUENT

file copy

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	05	01	TO	82	05	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) (46-53) QUANTITY OR LOADING (54-61) AVERAGE	MAXIMUM	UNITS	(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
COPPER, TOTAL (AS CU) 1 0 [illegible]	SAMPLE MEASUREMENT	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	0.[illegible]	MG/L			
	PERMIT REQUIREMENT	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]			ONCE/MONTH	COMPOSITE
CHROMIUM, TOTAL (AS CR) 1007 1 0 [illegible]	SAMPLE MEASUREMENT	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	MG/L			
	PERMIT REQUIREMENT	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]			ONCE/MONTH	COMPOSITE
IRON, TOTAL (AS FE) 1092 1 0 [illegible]	SAMPLE MEASUREMENT	[illegible]	[illegible]	[illegible]		[illegible]	[illegible]	MG/L			
	PERMIT REQUIREMENT	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]			ONCE/MONTH	COMPOSITE
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]			[illegible]	[illegible]
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT	[illegible]	[illegible]		[illegible]	[illegible]	[illegible]			[illegible]	[illegible]

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE		DATE		
Ernest Baillargeon Vice President	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*	Factory & Energy Manager	617	234-7451	1982	6	2
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)* [illegible] FOR 10 DILUTION.

[illegible] DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME ATF DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

Form Approved OMB No. 2000-0015

(2-16) MA0001252 PERMIT NUMBER

(17-19) 001 A DISCHARGE NUMBER

E - FINAL LIMITS TREATMENT PLANT EFFLUENT

file copy

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	04	01	TO	82	04	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) (46-53) QUANTITY OR LOADING (54-61) AVERAGE	MAXIMUM	UNITS	(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) MINIMUM	AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
[illegible]	SAMPLE MEASUREMENT	2,805	3975		******	******	******	******			
[illegible] 1 0 [illegible]	PERMIT REQUIREMENT	****** 3000 AVG	****** DAILY MX	LBS	******	******	******	******		CONTINUOUS	MEASURE
[illegible]	SAMPLE MEASUREMENT	******	******	******	6.0	******	6.9				
[illegible] 1 0 [illegible]	PERMIT REQUIREMENT	******	******	******	6.0 MINIMUM	******	9.5 MAXIMUM	SU		CONTINUOUS	
[illegible], TOTAL (AS CN) [illegible] 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	----	0.01				
	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	mg/L		1/WEEK	COMP
[illegible], FREE (AS [illegible]) [illegible] 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	----	Refer to Report				
	PERMIT REQUIREMENT	******	******	******	******	.05 DAILY AV	.1 DAILY MX	mg/L		1/WEEK	COMP
[illegible], TOTAL (AS CN) [illegible] 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	----	0.005				
	PERMIT REQUIREMENT	******	******	******	******	.2 DAILY AV	.2 DAILY MX	mg/L		1/WEEK	COMP
[illegible], HEXAVALENT (AS CR) [illegible] 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	----	0.005				
	PERMIT REQUIREMENT	******	******	******	******	.05 DAILY AV	.1 DAILY MX	mg/L		1/WEEK	COMP
[illegible], TOTAL (AS CR) [illegible] 1 0 [illegible]	SAMPLE MEASUREMENT	******	******	******	******	----	0.05				
	PERMIT REQUIREMENT	******	******	******	******	.5 DAILY AV	1.0 DAILY MX	mg/L		1/WEEK	COMP

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: AREA CODE, NUMBER

DATE: YEAR, MO, DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (*Reference all attachments here*) - PRIOR TO DILUTION.

REPORT DAILY RANGE & MEAN FOR PH.

Facility Name/Location if different)

NAME AIR DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

OMB No. 20

(2-16) MA0001257 — PERMIT NUMBER

(17-19) 001 A — DISCHARGE NUMBER

C - FINAL EFFLUENT
TREATMENT PLANT EFFLUENT

APRIL - 1982

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	04	01	TO	82	04	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
[illegible], Total (As Cd)	SAMPLE MEASUREMENT	******	******	******	******	----	< 0.29				
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.0 DAILY AV	1.0 DAILY MX	mg/l		DAILY/MONTH	COMPOS
[illegible], Total (As Ni)	SAMPLE MEASUREMENT	******	******	******	******	----	< 1.67				
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.0 DAILY AV	2.0 DAILY MX	mg/l		DAILY/MONTH	COMPOS
[illegible], Total (As Zn)	SAMPLE MEASUREMENT	******	******	******	******	----	< 0.119				
[illegible]	PERMIT REQUIREMENT	******	******	******	******	.0 DAILY AV	1.0 DAILY MX	mg/l		DAILY/MONTH	COMPOS
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT						<				
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

E. Baillargeon
Vice President

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

D. Marques
Fac. & Energy Mgr.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
617	234-7451	82	5	14
AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

[illegible] TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

MAILING NAME/ADDRESS (Include Facility Name/Location if different)

NAME: [illegible] DAVIDSON COMPANY

ADDRESS: [illegible] STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION: [illegible] G. [illegible], PLANT MANAGER

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2000-0015

(2-16) PERMIT NUMBER: MA0001257

(17-19) DISCHARGE NUMBER: 001 A

TREATMENT PLANT EFFLUENT

MONITORING PERIOD

	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	03	01	TO	82	03	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

File copy March - 1982

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) (46-53) QUANTITY OR LOADING (54-61) AVERAGE	MAXIMUM	UNITS	(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
[illegible]	SAMPLE MEASUREMENT	3,520	5,775		******	******	******	******			
[illegible] 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	[illegible]	******	******	******	******		[illegible]	[illegible]
[illegible] 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	******	******	******	6.0	******	7.3				
	PERMIT REQUIREMENT	******	******	******	6.0	******	9.5	SU		[illegible]	
ARSENIC, TOTAL (AS AS) [illegible] 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	******	******	******	******	----	0.070				
	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	UG/L		[illegible]	[illegible]
[illegible] (AS CD) [illegible] 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	******	******	******	******	----	0.070				
	PERMIT REQUIREMENT	******	******	******	******	.05	.1	UG/L		[illegible]	[illegible]
CHROMIUM, TOTAL (AS CR) [illegible] 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	******	******	******	******	----	0.012				
	PERMIT REQUIREMENT	******	******	******	******	.7	.2	UG/L		[illegible]	[illegible]
CHROMIUM, HEXAVALENT (AS CR) [illegible] 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	******	******	******	******	----	< 0.005				
	PERMIT REQUIREMENT	******	******	******	******	.05	.1	UG/L		[illegible]	[illegible]
CHROMIUM, TOTAL (AS CR) 1034 1 0 EFFLUENT GROSS VALUE	SAMPLE MEASUREMENT	******	******	******	******	----	< 0.05				
	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	UG/L		[illegible]	[illegible]

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: AREA CODE / NUMBER

DATE: YEAR / MO / DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (*Reference all attachments here*). FOR TO DILUTION.

REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME, ADDRESS (Mailing Address)
Facility Name (Location if different)

NAME: ATE DAVIDSON COMPANY
ADDRESS: MAIN STREET
WHITTINSVILLE MA 01588

FACILITY
LOCATION: G. ARNES, PLANT METALLURGIST

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2000-0015

(2-16) MA0001257 — PERMIT NUMBER
(17-19) 001 A — DISCHARGE NUMBER

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	03	01	TO	82	03	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
COPPER, TOTAL (AS CU)	SAMPLE MEASUREMENT	******	******	*****	******	- - - -	< 0.29				
1042 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	*****	******	*	*	MG/L		DAILY/MONTH	COMP
IRON, TOTAL (AS FE)	SAMPLE MEASUREMENT	******	******	*****	******	- - - -	1.02				
1045 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	*****	******	*	2.0	MG/L		DAILY/MONTH	COMP
ZINC, TOTAL (AS ZN)	SAMPLE MEASUREMENT	******	******	*****	******	- - - -	0.120				
1092 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	*****	******	*	1.0	MG/L		DAILY/MONTH	COMP
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
E. Baillargeon
Vice - President
TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

D. Marques
Fac. & Energy Mgr.
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
617	234-7451	82	4	5
AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here) TUR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME ATT DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

ATTN: G L AKERS, PLANT METALLURGIST

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2000-0015

(2-16) MA0001252 — PERMIT NUMBER

(17-19) 001 A — DISCHARGE NUMBER

F - FINAL LIMITS

TREATMENT PLANT EFFLUENT

File Copy -

FEBRUARY - 1982

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	02	01	TO	82	02	28
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
FLOW RATE	SAMPLE MEASUREMENT	2,902	4,350		******	******	******	******			
00[redacted] 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	GPD	******	******	******	******		CONTINUOUS	RCORDR
PH [redacted]	SAMPLE MEASUREMENT	******	******	******	5.6	******	7.5				
00400 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	6.0	******	9.5	SU		CONTINUOUS	
CYANIDE, TOTAL (AS CN)	SAMPLE MEASUREMENT	******	******	******	******	---	0.010				
00720 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMPOS
CYANIDE, FREE (AMEN. TO CHLORINATION)	SAMPLE MEASUREMENT	******	******	******	******	---	0.0				
00722 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/MONTH	COMPOS
CADMIUM, TOTAL (AS CD)	SAMPLE MEASUREMENT	******	******	******	******	---	0.005				
0[redacted]7 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.2	.2	MG/L		ONCE/MONTH	COMPOS
CHROMIUM, HEXAVALENT [redacted] (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	---	0.005				
01032 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/MONTH	COMPOS
CHROMIUM, TOTAL (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	---	0.05				
01034 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMPOS

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: AREA CODE, NUMBER

DATE: YEAR, MO, DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

(Location if different)

[redacted] DAVIDSON COMPANY

[redacted] MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

ATTN: G L AKERS, PLANT METALLURGIST

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2000-0013

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER
MA0001252	001 A

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	02	01	TO	82	02	28
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
COPPER, TOTAL (AS CU)	SAMPLE MEASUREMENT	******	******	******	******	---	0.57				
0[redacted]2 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/ MONTH	COMPOS
NICKEL, TOTAL (AS NI)	SAMPLE MEASUREMENT	******	******	******	******	---	0.93				
[redacted]01067 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	2.0	2.0	MG/L		ONCE/ MONTH	COMPOS
ZINC, TOTAL (AS ZN)	SAMPLE MEASUREMENT	******	******	******	******	---	0.130				
01092 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/ MONTH	COMPOS
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
[redacted]	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
[redacted]	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

E. Baillargeon
Vice-President

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 USC § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

D. Marques
Fac. & Energy Mgr.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
617	234-7451	82	3	5
AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME ATF DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

ATTN: G L AKERS, PLANT METALLURGIST

DISCHARGE MONITORING REPORT (DMR)

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER
MA0001252	001 A

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

File Copy — January-1982

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	01	01	TO	82	01	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)
FLOW RATE	SAMPLE MEASUREMENT	2625	4275		******	******	******	******		
00056 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	GPD	******	******	******	******		CONTINUOUS
PH	SAMPLE MEASUREMENT	******	******	******	2.0	******	10.2			
00400 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	6.0	******	9.5	SU		CONTINUOUS
CYANIDE, TOTAL (AS CN)	SAMPLE MEASUREMENT	******	******	******	******	----	<0.005			
00720 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH
CYANIDE, FREE (AMEN. TO CHLORINATION)	SAMPLE MEASUREMENT	******	******	******	******	0.0	0.0			
00722 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/MONTH
CADMIUM, TOTAL (AS CD)	SAMPLE MEASUREMENT	******	******	******	******	----	0.006			
01027 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.2	.2	MG/L		ONCE/MONTH
CHROMIUM, HEXAVALENT (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	----	<0.005			
01032 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/MONTH
CHROMIUM, TOTAL (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	----	<0.05			
01034 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319 (Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years)		TELEPHONE		DATE	
TYPED OR PRINTED		SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	AREA CODE	NUMBER	YEAR	MO

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

NAME/ADDRESS (Include Name/Location if different)

NAME ATF DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

ATTN: G L AKERS, PLANT METALLURGIST

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

Form Approve
OMB No. 2000

(2-16) PERMIT NUMBER: MA0001252

(17-19) DISCHARGE NUMBER: 001 A

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	82	01	01	TO	82	01	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SA T (6
COPPER, TOTAL (AS CU)	SAMPLE MEASUREMENT	******	******	******	******	- - - -	0.52				
01042 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/ MONTH	CO
NICKEL, TOTAL (AS NI)	SAMPLE MEASUREMENT	******	******	******	******	- - - -	1.43				
01067 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	2.0	2.0	MG/L		ONCE/ MONTH	CO
ZINC, TOTAL (AS ZN)	SAMPLE MEASUREMENT	******	******	******	******	- - - -	0.090				
01092 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/ MONTH	CO
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

E. Baillargeon
Vice-President

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

D. Marques

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE	
617	234-7451	82	2
AREA CODE	NUMBER	YEAR	MO

COMMENTS AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

LIMITS APPLY TO TREAT'E'T PLANT EFFLUENT PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME ATF DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

CTN: G L AKERS, PLANT METALLURGIST

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

DECEMBER 1987 FORM APPROVED OMB No. 2000-0015

F - FINAL LIMITS

TREATMENT PLANT EFFLUENT

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER
MA0001252	001 A

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	81	12	01	TO	81	12	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
FLOW RATE	SAMPLE MEASUREMENT	2866	4425		******	******	******	******		DAILY	METER
00056 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	GPD	******	******	******	******		CONTIN UOUS	RCORDR
PH	SAMPLE MEASUREMENT	******	******	******	6.0	******	10.6				
00400 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	6.0	******	9.5	SU		CONTIN UOUS	
CYANIDE, TOTAL (AS CN)	SAMPLE MEASUREMENT	******	******	******	******	0.005					
00720 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/ MONTH	COMPOS
CYANIDE, FREE (AVEN. O CHLORINATION)	SAMPLE MEASUREMENT	******	******	******	******	N.A.	N.A.				
00722 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/ MONTH	COMPOS
CADMIUM, TOTAL (AS CD)	SAMPLE MEASUREMENT	******	******	******	******	0.005	—				
1 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.2	.2	MG/L		ONCE/ MONTH	COMPOS
CHROMIUM, HEXAVALENT (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	0.005	—				
1032 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/ MONTH	COMPOS
CHROMIUM, TOTAL (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	0.05	—				
1034 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/ MONTH	COMPOS

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION I BELIEVE THE SUBMITTED INFORMATION IS TRUE ACCURATE AND COMPLETE I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT SEE 18 USC § 1001 AND 33 USC § 1319 (Penalties under these statutes may include fines up to $10,000 and or maximum imprisonment of between 6 months and 5 years.)

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: AREA CODE, NUMBER

DATE: YEAR, MO, DAY

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

NAME/ADDRESS (Include Facility/Location if different)
ATF DAVIDSON COMPANY
MAIN STREET
WHITINSVILLE MA 01588

FACILITY
LOCATION
CONTACT: G L AKERS, PLANT METALLURGIST

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

Form Approved
OMB No. 2000-0015

(2-16) PERMIT NUMBER: MA0001252
(17-19) DISCHARGE NUMBER: 001 A

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	81	12	01	TO	81	12	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
PPER, TOTAL (AS CU)	SAMPLE MEASUREMENT	******	******	******	******	0.17	—				
042 1 0 FLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMPOS
CKEL TOTAL (AS NI)	SAMPLE MEASUREMENT	******	******	******	******	1.12	—				
067 1 0 FLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	2.0	2.0	MG/L		ONCE/MONTH	COMPOS
NC, TOTAL (AS ZN)	SAMPLE MEASUREMENT	******	******	******	******	0.054	—				
092 1 0 FLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMPOS
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Ernest Baillargeon
Manufacturing, Mgr.
TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 USC § 1001 AND 33 USC § 1319. (Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)

Samuel Marques
Facilities Mgr.
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE: AREA CODE | NUMBER
DATE: YEAR | MO | DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)
LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

NAME [illegible] DAVIDSON COMPANY
ADDRESS MAIN STREET
WHITINSVILLE MA 01588

FACILITY
LOCATION

DISCHARGE MONITORING REPORT (D.M.R.)

OMB No. 2000-001

(2-16)	(17-19)
MA0001252	001 A
PERMIT NUMBER	DISCHARGE NUMBER

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	81	11	01	TO	81	11	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
FLOW RATE	SAMPLE MEASUREMENT	2,866	4,425		******	******	******	******	0	Cont.	N.A.
00056 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	GPD	******	******	******	******		CONTINUOUS	RECORD
PH	SAMPLE MEASUREMENT	******	******	******	6.3	******	7.3				
00400 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	6.0	******	9.5	SU		CONTINUOUS	
CYANIDE, TOTAL (AS CN)	SAMPLE MEASUREMENT	******	******	******	******	< 0.005	----				
00720 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMPO.
CYANIDE, FREE (AMEN. TO CHLORINATION)	SAMPLE MEASUREMENT	******	******	******	******	----	----				
00722 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/MONTH	COMPO.
CADMIUM, TOTAL (AS CD)	SAMPLE MEASUREMENT	******	******	******	******	< 0.005	----				
01027 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.2	.2	MG/L		ONCE/MONTH	COMPO.
CHROMIUM, HEXAVALENT (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	< 0.005	----				
01032 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/MONTH	COMPO.
CHROMIUM, TOTAL (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	< 0.05	----				
01034 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMPO.

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE		DATE		
Ernest Baillargeon Vice-President Mfg.	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 USC § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*	Daniel Marques SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	617-234-7451 AREA CODE NUMBER	81 YEAR	12 MO	8 DAY
TYPED OR PRINTED						

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)
LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

Form Approved
OMB No. 2000-0015

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
DISCHARGE MONITORING REPORT (DMR)

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

ADDRESS: HAVIDAON COMPANY
MAIN STREET
WHITINSVILLE MA 01588

FACILITY
LOCATION

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER
MA0001252	001 A

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	81	11	01	TO	81	11	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
COPPER, TOTAL (AS CU)	SAMPLE MEASUREMENT	******	******	******	******	0.17	----		0	Cont.	N.A.
01 2 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/ MONTH	COMPOS
KEL, TOTAL (AS NI)	SAMPLE MEASUREMENT	******	******	******	******	1.12	----				
01067 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	2.0	2.0	MG/L		ONCE/ MONTH	COMPOS
ZINC, TOTAL (AS ZN)	SAMPLE MEASUREMENT	******	******	******	******	0.054	----				
01092 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/ MONTH	COMPOS
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER
Ernest Baillargeon
Vice-President Mfg.
TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

Daniel Marques
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE AREA CODE	NUMBER	DATE YEAR	MO	DAY
617	234-7451	81	12	8

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*
LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

Facility Name/Location if different)

NAME STF DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2080-00

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER
MA0001252	001 A

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	81	10	01	TO	81	10	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) (46-53) QUANTITY OR LOADING (54-61) AVERAGE	MAXIMUM	UNITS	(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) MINIMUM	AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
FLOW RATE	SAMPLE MEASUREMENT	4002	7,050		******	******	******	******			
[redacted] 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	GPD 4002	******	******	******	******		CONTINUOUS	RECORD
PH [redacted]	SAMPLE MEASUREMENT	******	******	******	5.6	******	7.7				
00400 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	6.0	******	9.5	SU		CONTINUOUS	
CYANIDE, TOTAL (AS CN)	SAMPLE MEASUREMENT	******	******	******	******	0.050	******				
00720 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMPOS
CYANIDE, FREE (AMEN. TO CHLORINATION)	SAMPLE MEASUREMENT	******	******	******	******	0.043	******				
00722 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/MONTH	COMPOS
CADMIUM, TOTAL (AS CD)	SAMPLE MEASUREMENT	******	******	******	******	0.062	******				
01027 1 0 [redacted]UENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.2	.2	MG/L		ONCE/MONTH	COMPOS
CHROMIUM, HEXAVALENT (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	0.008	******				
[redacted]32 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/MONTH	COMPOS
CHROMIUM, TOTAL (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	<0.05	******				
01034 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMPOS

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER		TELEPHONE		DATE		
Ernest Baillargeon Manager of Manufacturing	I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*	Daniel Marques SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT	617 AREA CODE	234-3476 NUMBER	81 YEAR	11 MO	18 DAY
TYPED OR PRINTED						

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

Facility Name/Location (if different)

NAME ATE DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2060 00..

(2-16)	(17-19)
MA0001252	001 A
PERMIT NUMBER	DISCHARGE NUMBER

F - FINAL LIMITS

TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	81	10	01	TO	81	10	31
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
COPPER, TOTAL (AS CU)	SAMPLE MEASUREMENT	******	******	******	******	0.28	******				
42 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMPOS
NICKEL, TOTAL (AS NI)	SAMPLE MEASUREMENT	******	******	******	******	1.55	******				
01067 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	2.0	2.0	MG/L		ONCE/MONTH	COMPOS
ZINC, TOTAL (AS ZN)	SAMPLE MEASUREMENT	******	******	******	******	0.049	******				
01092 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMP
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Ernest Baillargeon
Manager of Manufacturing

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

Daniel Marques

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
617	234-7451	81	11	18
AREA CODE	NUMBER	YEAR	MO	DAY

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME ATF DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

FORM APPROVED OMB No. 2000-0015

(2-16) PERMIT NUMBER: MA0001252

(17-19) DISCHARGE NUMBER: 001 A

F - FINAL LIMITS

TREATMENT PLANT EFFLUENT

EPA

MONITORING PERIOD

	YEAR	MO	DAY		YEAR	MO	DAY
FROM	81	09	01	TO	81	09	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) QUANTITY OR LOADING (46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(4 Card Only) QUALITY OR CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
FLOW RATE	SAMPLE MEASUREMENT	5,200	7,050		******	******	******	******	0	Cont.	N.A.
00056 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	GPD	******	******	******	******		CONTI NUOUS	*COMPO
	SAMPLE MEASUREMENT	******	******	******	6.2	******	7.7				
00400 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	6.0	******	9.5	SU		CONTI NUOUS	
CYANIDE, TOTAL (AS CN)	SAMPLE MEASUREMENT	******	******	******	******	---	0.006				
00720 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/ MONTH	COMPO
CYANIDE, FREE (AMEN. TO CHLORINATION)	SAMPLE MEASUREMENT	******	******	******	******	---	---				
00722 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/ MONTH	COMPO
CADMIUM, TOTAL (AS CD)	SAMPLE MEASUREMENT	******	******	******	******	---	<0.005				
01027 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.2	.2	MG/L		ONCE/ MONTH	COMPO
CHROMIUM, HEXAVALENT (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	---	<0.005				
01032 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.05	.1	MG/L		ONCE/ MONTH	COMPO
CHROMIUM, TOTAL (AS CR)	SAMPLE MEASUREMENT	******	******	******	******	---	<0.05				
01034 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/ MONTH	COMPO

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Ernest Baillargeon
Manager of Manufacturing

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN; AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

Daniel Marques

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE		DATE		
AREA CODE	NUMBER	YEAR	MO	DAY
617	234-3476	81	9	5

COMMENT AND EXPLANATION OF ANY VIOLATIONS (Reference all attachments here)

APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.
DAILY RANGE & MEAN FOR PH.

PERMIT FACILITY NAME

PERMITTEE NAME/ADDRESS (Include Facility Name/Location if different)

NAME ATF DAVIDSON COMPANY

ADDRESS MAIN STREET

WHITINSVILLE MA 01588

FACILITY

LOCATION

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

OMB No. 2000-0015

(2-16) PERMIT NUMBER	(17-19) DISCHARGE NUMBER
MA0001252	001 A

F - FINAL LIMITS
TREATMENT PLANT EFFLUENT

MONITORING PERIOD	YEAR	MO	DAY		YEAR	MO	DAY
FROM	81	09	01	TO	81	09	30
	(20-21)	(22-23)	(24-25)		(26-27)	(28-29)	(30-31)

NOTE: Read instructions before completing this form.

PARAMETER (32-37)		(3 Card Only) (46-53) QUANTITY OR LOADING (54-61) AVERAGE	MAXIMUM	UNITS	(4 Card Only) (38-45) QUALITY OR CONCENTRATION (46-53) MINIMUM	(54-61) AVERAGE	MAXIMUM	UNITS	NO. EX (62-63)	FREQUENCY OF ANALYSIS (64-68)	SAMPLE TYPE (69-70)
COPPER, TOTAL (AS CU)	SAMPLE MEASUREMENT	******	******	******	******	---	0.29				
42 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMPOS
NICKEL, TOTAL (AS NI)	SAMPLE MEASUREMENT	******	******	******	******	---	0.35				
01067 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	2.0	2.0	MG/L		ONCE/MONTH	COMPO
ZINC, TOTAL (AS ZN)	SAMPLE MEASUREMENT	******	******	******	******	---	0.040				
01092 1 0 EFFLUENT GROSS VALUE	PERMIT REQUIREMENT	******	******	******	******	.5	1.0	MG/L		ONCE/MONTH	COMPO
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										
	SAMPLE MEASUREMENT										
	PERMIT REQUIREMENT										

NAME/TITLE PRINCIPAL EXECUTIVE OFFICER

Ernest Baillargeon
Manager of Manufacturing

TYPED OR PRINTED

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN, AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THE SUBMITTED INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. § 1001 AND 33 U.S.C. § 1319. *(Penalties under these statutes may include fines up to $10,000 and/or maximum imprisonment of between 6 months and 5 years.)*

Daniel Marques

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

TELEPHONE AREA CODE	NUMBER	DATE YEAR	MO	DAY
617	234-3476	81	9	5

COMMENT AND EXPLANATION OF ANY VIOLATIONS *(Reference all attachments here)*

LIMITS APPLY TO TREATMENT PLANT EFFLUENT PRIOR TO DILUTION.
REPORT DAILY RANGE & MEAN FOR PH.

DATE 9/1

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

DISCHARGE MONITORING REPORT

Form Approved
OMB NO. 158-R0073

Facility or discharge location

see INSTRUCTIONS on back

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST	(4-16) PERMIT NUMBER	(17-19) DIS
	MA0001252	01

REPORTING PERIOD: FROM (20-21) YEAR | (22-23) MO | (24-25) DAY — TO (26-27) YEAR 81 | (28-29) MO 8 | (30-31) DAY 19

(32-37) PARAMETER		(3 card only) QUANTITY (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-70) SAMPLE TYPE
Total Cyanide	REPORTED							0.006				1-31	8 Hr. Comp
	PERMIT CONDITION												
Cyanide Amenable to Chlorination	REPORTED							-----				"	"
	PERMIT CONDITION												
Total Suspended Solids	REPORTED							2.6				"	"
	PERMIT CONDITION												
Total Chromium	REPORTED							0.05				"	"
	PERMIT CONDITION												
Hexavalent Chromium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Cadmium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Copper	REPORTED							0.29				"	"
	PERMIT CONDITION												
Nickel	REPORTED							0.35				"	"
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE
Baillargeon, Ernest	Manager of Mfg.	81 10 21
LAST FIRST MI	TITLE	YEAR MO DAY

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

DISCHARGE MONITORING REPORT

Form Approved
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST	(4-16) PERMIT NUMBER	(17-19) DIS
	MA0001252	01

REPORTING PERIOD: FROM (20-21) YEAR | (22-23) MO | (24-25) DAY — TO (26-27) YEAR 81 | (28-29) MO 8 | (30-31) DAY 19

(32-37) PARAMETER		(3 card only) (38-45) QUANTITY MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) (38-45) CONCENTRATION MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-70) SAMPLE TYPE
Zinc	REPORTED							0.040				1-31	~~8 Hr.~~ Comp.
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE
Baillargeon, Ernest	Manager of Mfg.	81 10 21
LAST FIRST MI	TITLE	YEAR MO DAY

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

DISCHARGE MONITORING REPORT

Form Approved
OMB NO. 158-R0073

Facility or discharge location

see INSTRUCTIONS on back

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST	(4-16) PERMIT NUMBER	(17-19) DIS
	MA0001252	01

REPORTING PERIOD FROM (20-21) YEAR | (22-23) MO | (24-25) DAY — TO (26-27) YEAR | (28-29) MO | (30-31) DAY: 81 | 17 | 21

(32-37) PARAMETER		(3 card only) QUANTITY (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-70) SAMPLE TYPE
Total Cyanide	REPORTED							0.010				1-31	8 Hr. Comp.
	PERMIT CONDITION												
Cyanide Amenable to Chlorination	REPORTED							-----				"	"
	PERMIT CONDITION												
Total Suspended Solids	REPORTED							1.3				"	"
	PERMIT CONDITION												
Total Chromium	REPORTED							0.05				"	"
	PERMIT CONDITION												
Hexavalent Chromium	REPORTED							0.008				"	"
	PERMIT CONDITION												
Cadmium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Copper	REPORTED							0.21				"	"
	PERMIT CONDITION												
Nickel	REPORTED							0.64				"	"
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE			
Baillargeon, Ernest	Manager of Mfg.	81	10	21	
LAST FIRST MI	TITLE	YEAR	MO	DAY	

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
DISCHARGE MONITORING REPORT

Form Approved
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST: | (4-16) PERMIT NUMBER: MA0001252 | (17-19) DIS: 01

REPORTING PERIOD FROM (20-21) YEAR | (22-23) MO | (24-25) DAY TO (26-27) YEAR 81 | (28-29) MO 7 | (30-31) DAY 21

(32-37) PARAMETER		(3 card only) QUANTITY (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-70) SAMPLE TYPE
Zinc	REPORTED							0.060				1-31	8 Hr. Comp.
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE	
Baillargeon, Ernest	Manager of Mfg.	81 10 21	*I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.*
LAST FIRST MI	TITLE	YEAR MO DAY	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

Facility or discharge location

DISCHARGE MONITORING REPORT

Form A
OMB NO.

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST:

(4-16) PERMIT NUMBER: MA 001252

(17-19) DIS: 01

REPORTING PERIOD: FROM (20-21) YEAR 1 (22-23) MO 1 (24-25) DAY 1 TO (26-27) YEAR 81 (28-29) MO 6 (30-31) DAY 24

(32-37) PARAMETER		(3 card only) (38-45) QUANTITY MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) (38-45) CONCENTRATION MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-70) SAMPLE TYPE
Total Cyanide	REPORTED							0.062				1-30	~~8 Hr.~~ Comp.
	PERMIT CONDITION												
Cyanide Amenable to Chlorination	REPORTED							0.046				"	"
	PERMIT CONDITION												
Total Suspended Solids	REPORTED							1.3				"	"
	PERMIT CONDITION												
Total Chromium	REPORTED							0.05				"	"
	PERMIT CONDITION												
Hexavalent Chromium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Cadmium	REPORTED							0.008				"	"
	PERMIT CONDITION												
Copper	REPORTED							0.28				"	"
	PERMIT CONDITION												
Nickel	REPORTED							0.67				"	"
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE
Baillargeon, Ernest	Manager of Mfg.	81 7 20
LAST FIRST MI	TITLE	YEAR MO DAY

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

Joseph Reed
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

DISCHARGE MONITORING REPORT

OMB

Facility or discharge location

see INSTRUCTIONS on back

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST: | (4-16) PERMIT NUMBER: MA 001252 | (17-19) DIS: 01

REPORTING PERIOD FROM (20-21) YEAR | (22-23) MO | (24-25) DAY TO (26-27) YEAR 81 | (28-29) MO 6 | (30-31) DAY 24

(32-37) PARAMETER		(3 card only) QUANTITY (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-72) SAMPLE TYPE
Zinc	REPORTED							0.040				1-30	8 Hr. Comp.
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE		
Baillargeon, Ernest	Manager of Mfg.	81	7	20
LAST FIRST MI	TITLE	YEAR	MO	DAY

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

Joseph Rand

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

Facility or discharge location

DISCHARGE MONITORING REPORT

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST | (4-16) MA 001252 PERMIT NUMBER | (17-19) 01 DIS

REPORTING PERIOD FROM (20-21) YEAR (22-23) MO (24-25) DAY TO (26-27) YEAR 81 (28-29) MO 52 (30-31) DAY 7

(32-37) PARAMETER		(3 card only) (38-45) QUANTITY MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) (38-45) CONCENTRATION MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-70) SAMPLE TYPE
Total Cyanide	REPORTED							0.010				1-31	8 Hr. Comp.
	PERMIT CONDITION												
Cyanide Amenable to Chlorination	REPORTED							-----				"	"
	PERMIT CONDITION												
Total Suspended Solids	REPORTED							1.4				"	"
	PERMIT CONDITION												
Total Chromium	REPORTED							0.05				"	"
	PERMIT CONDITION												
Hexavalent Chromium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Cadmium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Copper	REPORTED							0.20				"	"
	PERMIT CONDITION												
Nickel	REPORTED							1.02				"	"
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE
Baillargeon, Ernest (LAST FIRST MI)	Manager of Mfg. (TITLE)	81 (YEAR) 7 (MO) 20 (DAY)

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

Joseph Baril
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

DISCHARGE MONITORING REPORT

OMB No.

Facility or discharge location

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST:

(4-16) PERMIT NUMBER: MA 001252

(17-19) DIS: 01

REPORTING PERIOD FROM (20-21) YEAR (22-23) MO (24-25) DAY TO (26-27) YEAR 81 (28-29) MO 5 (30-31) DAY 27

(32-37) PARAMETER		(3 card only) QUANTITY (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-70) SAMPLE TYPE
Zinc	REPORTED							0.05				1-31	8 Hr. Comp.
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER (LAST, FIRST, MI)	TITLE OF THE OFFICER (TITLE)	DATE (YEAR MO DAY)	
Baillargeon, Ernest	Manager of Mfg.	81 7 20	I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
DISCHARGE MONITORING REPORT

OMB

Facility or discharge location

see INSTRUCTIONS on back

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST: | (4-16) PERMIT NUMBER: MA 001252 | (17-19) DIS: 01

REPORTING PERIOD. FROM (20-21) YEAR | (22-23) MO | (24-25) DAY TO (26-27) YEAR 81 | (28-29) MO 42 | (30-31) DAY 2

(32-37) PARAMETER		(3 card only) QUANTITY (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-70) SAMPLE TYPE
Total Cyanide	REPORTED							0.005				1-30	8 Hr. Comp.
	PERMIT CONDITION												
Cyanide Amenable to Chlorination	REPORTED							------				"	"
	PERMIT CONDITION												
Total Suspended Solids	REPORTED							0.5				"	"
	PERMIT CONDITION												
Total Chromium	REPORTED							0.05				"	"
	PERMIT CONDITION												
Hexavalent Chromium	REPORTED							0.01				"	"
	PERMIT CONDITION												
Cadmium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Copper	REPORTED							0.09				"	"
	PERMIT CONDITION												
Nickel	REPORTED							0.17				"	"
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE
Baillargeon, Ernest (LAST FIRST MI)	Manager of Mfg. (TITLE)	81 7 20 (YEAR MO DAY)

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

Joseph Rossi
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
DISCHARGE MONITORING REPORT

OMB

Facility or discharge location

see INSTRUCTIONS on back

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST

(14-16) MA 001252 PERMIT NUMBER

(17-19) 01 DIS

REPORTING PERIOD FROM (20-21) YEAR (22-23) MO (24-25) DAY TO (26-27) YEAR (28-29) MO (30-31) DAY
8 1 4 2 2

(32-37) PARAMETER		(3 card only) QUANTITY (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-70) SAMPLE TYPE
Zinc	REPORTED							0.04				1-30	8 Hr. Comp.
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE				
Baillargeon, Ernest	Manager of Mfg.	8 1	7 2 0			
LAST FIRST MI	TITLE	YEAR	MO	DAY		

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

Joseph Rose
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
DISCHARGE MONITORING REPORT

Form Approved
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

ST: | PERMIT NUMBER: MA 001252 | DIS: 01

REPORTING PERIOD FROM YEAR | MO | DAY TO YEAR 81 MO 3 DAY 25

PARAMETER		QUANTITY (3 card only) MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX	CONCENTRATION (4 card only) MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
Total Cyanide	REPORTED							0.010				1-31	~~8 Hr.~~ Comp.
	PERMIT CONDITION												
Cyanide Amenable to Chlorination	REPORTED							0				"	"
	PERMIT CONDITION												
Total Suspended Solids	REPORTED							1.3				"	"
	PERMIT CONDITION												
Total Chromium	REPORTED							0.05				"	"
	PERMIT CONDITION												
Hexavalent Chromium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Cadmium	REPORTED							0.006				"	"
	PERMIT CONDITION												
Copper	REPORTED							0.13				"	"
	PERMIT CONDITION												
Nickel	REPORTED							0.35				"	"
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER (LAST, FIRST, MI)	TITLE OF THE OFFICER (TITLE)	DATE (YEAR MO DAY)	
Dallargeon, Ernest	Manager of Mfg.	81 4 2	I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate. Joseph [illegible] SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
DISCHARGE MONITORING REPORT

Form Approved
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

ST: | PERMIT NUMBER: MA 001252 | DIS: 01

REPORTING PERIOD FROM YEAR | MO | DAY TO YEAR 81 | MO 3 | DAY 25

PARAMETER		QUANTITY (3 card only) MINIMUM	AVERAGE	MAXIMUM	UNITS	NO EX	CONCENTRATION (4 card only) MINIMUM	AVERAGE	MAXIMUM	UNITS	NO. EX	FREQUENCY OF ANALYSIS	SAMPLE TYPE
Zinc	REPORTED							0.05				1-31	~~8 Hr.~~ Comp.
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER (LAST, FIRST, MI)	TITLE OF THE OFFICER	DATE (YEAR MO DAY)	
Baillargeon, Ernest	Manager of Mfg.	81 4 2	I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate. Joseph Rose — SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

DISCHARGE MONITORING REPORT

Form Approved
OMB NO. 158-R0073

Facility or discharge location

see INSTRUCTIONS on back

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST	(4-16) PERMIT NUMBER	(17-19) DIS
	MA 001252	01

REPORTING PERIOD FROM (20-21) YEAR 1 (22-23) MO 1 (24-25) DAY 1 TO (26-27) YEAR 81 (28-29) MO 12 (30-31) DAY 21

(32-37) PARAMETER		(3 card only) QUANTITY (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-70) SAMPLE TYPE
Total Cyanide	REPORTED							0.024				1-28	8 Hr. Comp.
	PERMIT CONDITION												
Cyanide Amenable to Chlorination	REPORTED							0.014				"	"
	PERMIT CONDITION												
Total Suspended Solids	REPORTED							1.8				"	"
	PERMIT CONDITION												
Total Chromium	REPORTED							0.05				"	"
	PERMIT CONDITION												
Hexavalent Chromium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Cadmium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Copper	REPORTED							0.17				"	"
	PERMIT CONDITION												
Nickel	REPORTED							0.35				"	"
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE
Baillargeon, Ernest	Manager of Mfg.	81 4 2
LAST FIRST MI	TITLE	YEAR MO DAY

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

Joseph Rose

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

DISCHARGE MONITORING REPORT

Form Approved
OMB NO. 158-R0073

Facility or discharge location

see INSTRUCTIONS on back

Name ATF-Davidson Co.
Street Main St.
City Whitinsville,
State/Zip code Mass. 01588

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST	(4-16) PERMIT NUMBER	(17-19) DIS
	MA 001252	01

REPORTING PERIOD: FROM (20-21) YEAR | (22-23) MO | (24-25) DAY — TO (26-27) YEAR 81 | (28-29) MO 12 | (30-31) DAY 24

(32-37) PARAMETER		(3 card only) QUANTITY (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) CONCENTRATION (38-45) MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-70) SAMPLE TYPE
Zinc	REPORTED							0.04				1-28	8 Hr. Comp.
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE		
Baillargeon, Ernest	Manager of Mfg.	81	14	1
LAST FIRST MI	TITLE	YEAR	MO	DAY

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

Joseph Rosa

SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
DISCHARGE MONITORING REPORT

Form Approved
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

see INSTRUCTIONS on back

Remarks

Telephone number (including area code) (617) 234-7451

(2-3) ST: | (4-16) PERMIT NUMBER: MA 001252 | (17-19) DIS: 01

REPORTING PERIOD FROM (20-21) YEAR | (22-23) MO | (24-25) DAY TO (26-27) YEAR 81 | (28-29) MO 12 | (30-31) DAY 21

(32-37) PARAMETER		(3 card only) (38-45) QUANTITY MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(4 card only) (38-45) CONCENTRATION MINIMUM	(46-53) AVERAGE	(54-61) MAXIMUM	UNITS	(62-63) NO. EX	(64-68) FREQUENCY OF ANALYSIS	(69-75) SAMPLE TYPE
Total Cyanide	REPORTED							0.009				1-31	8 Hr. Comp.
	PERMIT CONDITION												
Cyanide Amenable to Chlorination	REPORTED							0.007				"	"
	PERMIT CONDITION												
Total Suspended Solids	REPORTED							2.0				"	"
	PERMIT CONDITION												
Total Chromium ✓	REPORTED							0.05				"	"
	PERMIT CONDITION												
Hexavalent Chromium	REPORTED							0.005				"	"
	PERMIT CONDITION												
Cadmium ✓	REPORTED							0.010				"	"
	PERMIT CONDITION												
Copper ✓	REPORTED							0.17				"	"
	PERMIT CONDITION												
Nickel ✓	REPORTED							1.29				"	"
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE
Baillargeon, Ernest	Manager of Mfg.	81 14 2
LAST FIRST MI	TITLE	YEAR MO DAY

I certify that I am familiar with the information contained in this report and that to the best of my knowledge and belief such information is true, complete, and accurate.

Joseph Rand
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

DISCHARGE MONITORING REPORT

Form Approved
OMB NO. 158-R0073

Facility or discharge location

Name ATF-Davidson Co.
Street Main St.
City Whitinsville
State/Zip code Mass. 01588

see IN

Remark

Telephone number (including area code) (617) 234-7451

(2-3) ST: | (4-16) PERMIT NUMBER: MA 001252 | (17-19) DIS: 01

REPORTING PERIOD FROM (20-21) YEAR | (22-23) MO | (24-25) DAY TO (26-27) YEAR 81 | (28-29) MO 1 | (30-31) DAY 21

Konich - is buying a piece of the property & is disputing the acreage He has threatened to call us & report the CERCLA notification which he informs about
Will recieve reply by 3/15

PARAMETER (32-37)		QUANTITY (3 card only) MINIMUM (38-45)	AVERAGE (46-53)	MAXIMUM (54-61)	UNITS	NO. EX (62-63)	(4 card only) MINIMUM (38-45)	AVE					
Zinc	REPORTED							0.					Hr.
	PERMIT CONDITION												omp.
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												
	REPORTED												
	PERMIT CONDITION												

NAME OF PRINCIPAL EXECUTIVE OFFICER	TITLE OF THE OFFICER	DATE
Baillargeon, Ernest	Manager of Mfg.	81 4 2
LAST FIRST MI	TITLE	YEAR MO DAY

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Joseph Rossi
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

SCANNED

Corey Management Company, Inc.

Date: 11/04/02

To: MARK MATYS
DEP CRD

Fax #: 508-792-7621

From: DAN COREY

Message:

ATF DAVIDSON - NORTHBRIDGE

RTN 2-0111

PER YOUR REQUEST, ATTACHED ARE BWSC-104 & BWSC-111 FIRST SHEETS, SHOWING CORRECT STREET NUMBER (#355 MAIN). THE TRANSMITTALS HAD BEEN PREPARED TO AGREE WITH DEP'S DATA BASE (SEE NOAF DATED 01/23/02) EVEN THOUGH IT HAD WRONG STREET NUMBER.

3 **Pages Including This Cover**

The documents accompanying this telecopy transmission contain confidential, privileged or proprietary information that either constitutes the property of Corey Management Company, Inc., or if the property of another represents information that is within Corey Management's care, custody and control. The information is intended for the use of the individual or entity named on the transmission sheet. If you are not the intended recipient, be aware that any disclosure, copying or use of this telecopied information is prohibited. If you received this telecopy in error, please notify us so that we may arrange for retrieval of the documents at no cost to you. Thank you.

P.O. Box 276
Bedford, MA 01730-0276

TEL: (781) 275-2970
FAX: (781) 275-3557

nym: AND: 11/27/02
CCDB

Golder Associates Inc.

540 North Commercial Street, Suite 250
Manchester, NH 03101-1146
Telephone (603) 668-0880
Fax (603) 668-1199

Golder Associates

November 26, 2002

Our Ref.: 023-6969

Massachusetts Department of
Environmental Protection
Central Regional Office
Bureau of Waste Site Cleanup
627 Main Street
Worcester, MA 01608

RECEIVED
NOV 27 2002
DEP - CERO

Attention: Mr. Greg Root

RE: RETRACTION OF RESPONSE ACTION OUTCOME
THE SHOP AT WHITINSVILLE 1 Main St
RTN 2-00112 (Northbridge)

Dear Mr. Root:

On behalf of Electrolux Home Products Inc. (Electrolux), Golder Associates Inc. (Golder) is submitting this Notice of Remedial Action Outcome (RAO) retraction of the above-referenced site. Specifically, Electrolux is retracting the Class A-3 RAO filed by Blasland, Bouck & Lee, Inc. (BB&L) in October 1997 for the Building 9-Raceway area of the property. This RAO retraction notification is being submitted in response to the Notice of Noncompliance dated April 29, 2002 (NON-CE-02-3017) and your Audit Follow-up Plan Response letter dated December 2, 2002

As an attachment to this letter we have included a copy of the Tier II Extension BWSC-107A Form submitted by BB&L as part of the August 1, 2002 NON Follow-up Plan.

Should you have any questions regarding this letter please do not hesitate to call me at (603) 668-0880 or Ms. Gail Helfrick of Quantum Management Group at (609) 259-4091.

Sincerely,

GOLDER ASSOCIATES INC.

Alistair P. T. Macdonald, CPG, LSP
Branch Manager and Principal

Cc: M. Baldi – MADEP
D. Mix – Electrolux
G. Helfrick – Quantum

APTM/cak

P:\Projects\2002\023-6969\Correspondence\112602.doc

Massachusetts Department of Environmental Protection **BWSC-107A**
Bureau of Waste Site Cleanup

TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

Release Tracking Number: 2 - 112

A. DISPOSAL SITE LOCATION:

Disposal Site Name: The Shop (Covitch Property)

Street: 1 Main Street Location Aid:

City/Town: Whitinsville (Northbridge) ZIP Code: 01588-0000

Related Release Tracking Numbers That This Submittal Will Address:

B. THIS FORM IS BEING USED TO: (check all that apply)

RECEIVED NOV 27 2002 DEP - CERO

☐ Submit a new or revised **Tier Classification Submittal for a Tier I Site**, including a Numerical Ranking Scoresheet (complete Sections A, B, C, I, J, K and L).

☐ Submit a new or revised **Tier Classification Submittal for a Tier II Site**, including a Numerical Ranking Scoresheet (complete Sections A, B, C, F, G, I, J, K and L).

☐ Submit a **Notice that an additional Release Tracking Number(s) is (are) being linked to this Tier Classified Site** and rescoring is not required at this time (complete Sections A, B, J, K and L). If this submittal is for a Tier I Site, you must also submit a Minor Permit Modification Transmittal Form (BWSC-109).

List Additional Release Tracking Number(s):

☐ Submit a **Phase I Completion Statement supporting a Tier Classification Submittal** (complete Sections A, B, I, J, K and L).

☑ Submit a **Tier II Extension Submittal** for Response Actions at a Tier II Site (complete Sections A, B, D, F, G, I, J, K and L).

☐ Submit a **Tier II Extension Submittal for Response Actions taken after expiration of a Waiver**, pursuant to 310 CMR 40.0630(4) (complete Sections A, B, D, F, J, K and L, and also complete Sections G and I *or* Section H).*

☐ Submit a **Tier II Transfer Submittal** for a change in person(s) undertaking Response Actions at a Tier II Site (complete Sections A, B, E, F, G, I, J, K, L, M, N and O).

☐ Submit a **Tier II Transfer Submittal for a change in person(s) undertaking Response Actions at a Waiver Site**, pursuant to 310 CMR 40.0630(6) (complete Sections A, B, E, F, J, K, L, M, N and O, and also complete Sections G and I *or* Section H).*

You must attach all supporting documentation required for each use of form indicated, including copies of any Legal Notices and Notices to Public Officials required by 310 CMR 40.1400.
***NOTE: The Waiver expires on the effective date of this submittal and all further Response Actions must be taken as a Tier II Site.**

C. TIER CLASSIFICATION SUBMITTAL:

Numerical Ranking Score for Disposal Site: (from Numerical Ranking Scoresheet)

Proposed Tier Classification of Disposal Site: (check one) ☐ Tier IA ☐ Tier IB ☐ Tier IC ☑ Tier II

Check which, if any, of the Tier I inclusionary criteria are met by the Disposal Site, pursuant to 310 CMR 40.0520:

☐ Groundwater is located within an Interim Wellhead Protection Area or a Zone II, and there is evidence of groundwater contamination by an Oil or Hazardous Material at the time of Tier Classification at concentrations equal to or exceeding the applicable RCGW-1 Reportable Concentration set forth in 310 CMR 40.0360.

☐ An Imminent Hazard is present at the time of Tier Classification.

☐ Check here if this Tier Classification revises a previous submittal for this Disposal Site. You must include a revised Numerical Ranking Scoresheet with this submittal. If a Tier I Permit has been issued, you may also need to submit a Major Permit Modification Application (BWSC 10).

If incorporating additional Release(s) into the Disposal Site, list Release Tracking Number(s):

D. TIER II EXTENSION SUBMITTAL

State the expiration date of the Tier II Classification or Waiver for the Disposal Site, whichever is applicable:

Attach a statement summarizing why a Permanent or Temporary Solution has not been achieved at the Disposal Site.
A Tier II Extension is effective for a period of one year beyond the current expiration date of the Tier II Classification or Waiver.

E. TIER II TRANSFER SUBMITTAL REQUIREMENTS:

State the proposed effective date of the change in person(s) undertaking Response Actions at the Disposal Site:

Attach a statement summarizing the reasons for the proposed change in person(s) undertaking the Response Actions.
All Response Actions must be completed by the deadline applicable to the person who first filed either a Tier Classification Submittal for the Disposal Site or received a Waiver of Approvals.

TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

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F. DISPOSAL SITE COMPLIANCE HISTORY SUMMARY:

> If providing either a **Tier Classification Submittal for a Tier II Site** or a **Tier II Extension Submittal for a Waiver Site**, the person named in **Section J** must provide a Compliance History.
> If providing a **Tier II Extension Submittal for a Tier II Site**, the person named in **Section J** must **update** their Compliance History since the effective date of the Tier II Classification.
> If providing a **Tier II Transfer Submittal for a Tier II or Waiver Site**, the person named in **Section M** must provide a Compliance History.

Compliance History for (provide only one name per History): See NON Follow-Up & Tier II Extension Report

☐ Check here if there has been no change to the Compliance History of the person named above (Extension Submittal for a Tier II Site ONLY).

List all permits or licenses that have been issued by the Department that are relevant to this Disposal Site:

PROGRAM:	PERMIT NUMBER:	PERMIT CATEGORY:	FACILITY ID:
Air Quality			
Hazardous Waste (M.G.L. c. 21C)			
Solid Waste			
Industrial Wastewater Management			
Water Supply			
Water Pollution Control/Surface Water			
Water Pollution Control/Groundwater			
Water Pollution Control/Sewer Connection			
Wetland & Waterways			

List all other Federal, state or local permits, licenses, certifications, registrations, variances, or approvals that are relevant to this Disposal Site:

ISSUING AUTHORITY OR PROGRAM, OR DOCUMENTATION TYPE:	IDENTIFICATION NUMBER:	DATE ISSUED:

If needed, attach to this Transmittal Form a statement further describing the Compliance History of this Disposal Site. This statement must describe the compliance history of the person named above with the following:

(1) DEP regulations; and
(2) other laws for the protection of health, safety, public welfare and the environment administered or enforced by any other government agency.

Such a statement should identify information such as:

(1) actions relevant to the Disposal Site taken by the Department to enforce its requirements including, but not limited to, a Notice of Noncompliance (NON), Notice of Intent to Assess Civil Administrative Penalty (PAN), Notice of Intent to Take Response Action (NORA), and an administrative enforcement order;
(2) administrative consent orders;
(3) judicial consent judgements;
(4) similar administrative actions taken by other Federal, state or local agencies;
(5) civil or criminal actions relevant to the Disposal Site brought on behalf of the DEP or other Federal, state, or local agencies; and
(6) any additional relevant information.

(1) name of the issuing authority, type of action, identification number and date issued;
(2) description of noncompliance cited;
(3) current status of the matter; and
(4) final disposition, if any.

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TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

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G. CERTIFICATION OF ABILITY AND WILLINGNESS:

> If providing either a **Tier II Classification Submittal** or a **Tier II Extension Submittal**, the person who signs this certification **MUST** be the person named in **Section J**, or that person's agent.

> If providing a **Tier II Transfer Submittal**, the person who signs this certification **MUST** be the person named in **Section M**, or that person's agent.

I attest under the pains and penalties of perjury that (i) I/the person(s) or entity(ies) on whose behalf this submittal is made has/have personally examined and am/is familiar with the requirements of M.G.L. c. 21E and 310 CMR 40.0000; (ii) based upon my inquiry of the/those Licensed Site Professional(s) employed or engaged to render Professional Services for the disposal site which is the subject of this Transmittal Form and of the person(s) or entity(ies) on whose behalf this submittal is made, and my/that person's(s') or entity's(ies') understanding as to the estimated costs of necessary response actions, that/those person(s) or entity(ies) has/have the technical, financial and legal ability to proceed with response actions for such site in accordance with M.G.L. c. 21E, 310 CMR 40.0000 and other applicable requirements; and (iii) that I am fully authorized to make this attestation on behalf of the person(s) or entity(ies) legally responsible for this submittal. I/the person(s) or entity(ies) on whose behalf this submittal is made is aware of the requirements in 310 CMR 40.0172 for notifying the Department in the event that I/the person(s) or entity(ies) on whose behalf this submittal is made learn(s) that it/they is/are unable to proceed with the necessary response actions.

By: _____ (signature) Title: Property Manager

For: The Shop at Whitinsville (print name of person or entity recorded in Section J or M, as appropriate) Date: Aug 5, 2002

If you are submitting either a Tier II Extension Submittal for a Waiver Site or a Tier II Transfer Submittal for a Waiver Site, you may choose to sign the alternative Ability and Willingness Certification found in Section H in place of providing the certification in Section G and the LSP Opinion in Section I.

H. ALTERNATIVE CERTIFICATION OF ABILITY AND WILLINGNESS:

> If providing a **Tier II Extension Submittal for a Waiver Site**, the person who signs this certification **MUST** be the person named in **Section J**, or that person's agent

> If providing a **Tier II Transfer Submittal for a Waiver Site**, the person who signs this certification **MUST** be the person named in **Section M**, or that person's agent.

I attest under the pains and penalties of perjury that (i) I/the person(s) or entity(ies) on whose behalf this submittal is made has/have personally examined and am/is familiar with the requirements of M.G.L. c. 21E and 310 CMR 40.0000; (ii) based upon my inquiry of the Consultant-of-Record for the disposal site which is the subject of this Transmittal Form and of the person(s) or entity(ies) on whose behalf this submittal is made, and my/that person's(s') or entity's(ies') understanding as to the estimated costs of necessary response actions, that/those person(s) or entity(ies) has/have the technical, financial and legal ability to proceed with response actions for such site in accordance with M.G.L. c. 21E, 310 CMR 40.0000 and other applicable requirements; and (iii) that I am fully authorized to make this attestation on behalf of the person(s) or entity(ies) legally responsible for this submittal. I/the person(s) or entity(ies) on whose behalf this submittal is made is aware of the requirements in 310 CMR 40.0172 for notifying the Department in the event that I/the person(s) or entity(ies) on whose behalf this submittal is made learn(s) that it/they is/are unable to proceed with the necessary response actions.

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By: _____ (signature) Title: DEP - CERO

For: _____ (print name of person or entity recorded in Section J or M, as appropriate) Date: _____

I. LSP OPINION:

I attest under the pains and penalties of perjury that I have personally examined and am familiar with this transmittal form, including any and all documents accompanying this submittal. In my professional opinion and judgment based upon application of (i) the standard of care in 309 CMR 4.02(1), (ii) the applicable provisions of 309 CMR 4.02(2) and (3), and (iii) the provisions of 309 CMR 4.03(5), to the best of my knowledge, information and belief,

> *if Section B of this form indicates that a **Tier I or Tier II Classification Submittal** which relies upon a previously submitted Phase I Completion Statement is being submitted*, this Tier Classification Submittal has been developed in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000;

> *if Section B of this form indicates that a **Phase I Completion Statement** or a **Tier I or Tier II Classification Submittal** which does not rely upon a previously submitted Phase I Completion Statement is being submitted*, the response action(s) that is (are) the subject of this submittal (i) has (have) been developed and implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes of such response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this submittal;

SECTION I IS CONTINUED ON THE NEXT PAGE

Massachusetts Department of Environmental Protection **BWSC-107A**
Bureau of Waste Site Cleanup

TIER CLASSIFICATION, TIER II EXTENSION & TIER II TRANSFER TRANSMITTAL FORM

Pursuant to 310 CMR 40.0510 and 40.0560 (Subpart E)

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I. LSP OPINION: (continued)

> *if Section B of this form indicates that a **Tier II Extension Submittal** or a **Tier II Transfer Submittal** is being submitted,* the response action(s) that is (are) the subject of this submittal (i) is (are) being implemented in accordance with the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, (ii) is (are) appropriate and reasonable to accomplish the purposes ofsuch response action(s) as set forth in the applicable provisions of M.G.L. c. 21E and 310 CMR 40.0000, and (iii) complies(y) with the identified provisions of all orders, permits, and approvals identified in this

I am aware that significant penalties may result, including, but not limited to, possible fines and imprisonment, if I submit information which I know to be false, inaccurate or materially incomplete.

☐ Check here if the Response Action(s) on which this opinion is based, if any, are (were) subject to any order(s), permit(s) and/or approval(s) issued by DEP or EPA. If the box is checked, you MUST attach a statement identifying the applicable provisions thereof.

LSP Name: Caron S. Koll LSP #: 6889 Stamp:

Telephone: 315-446-2570 Ext.: 148

FAX: (optional) 315-446-8053

Signature: Caron Koll

Date: 8/1/02

COMMONWEALTH OF MASSACHUSETTS — CARON S. KOLL No. 6889 — REGISTERED LICENSED SITE PROFESSIONAL

J. PERSON MAKING SUBMITTAL: (For Transfer Submittals describe person currently undertaking response actions, not transferee)

Name of Organization: The Shop at Whitinsville

Name of Contact: Leonard S. Jolles Title: Property Manager

Street: One Main Street

City/Town: Whitinsville State: MA ZIP Code: 01588-0000

Telephone: 508-234-6301 Ext.: FAX: (optional)

K. RELATIONSHIP TO DISPOSAL SITE OF PERSON MAKING SUBMITTAL: (check one)

☑ RP or PRP Specify: ◉ Owner ○ Operator ○ Generator ○ Transporter Other RP or PRP:

☐ Fiduciary, Secured Lender or Municipality with Exempt Status (as defined by M.G.L. c. 21E, s. 2)

☐ Agency or Public Utility on a Right of Way (as defined by M.G.L. c. 21E, s. 5(j))

☐ Any Other Person Making Submittal Specify Relationship:

L. CERTIFICATION OF PERSON MAKING SUBMITTAL:

I, Leonard S. Jolles, attest under the pains and penalties of perjury (i) that I have personally examined and am familiar with the information contained in this submittal, including any and all documents accompanying this transmittal form, (ii) that, based on my inquiry of those individuals immediately responsible for obtaining the information, the material information contained in this submittal is, to the best of my knowledge and belief, true, accurate and complete, and (iii) that I am fullyauthorized to make this attestation on behalf of the entity legally responsible for this submittal. I/the person or entity on whose behalf this submittal is made am/is aware that there are significant penalties, including, but not limited to, possible fines and imprisonment, for willfully submitting false, inaccurate, or incomplete information.

By: (signature) Title: Property Manager

For: Leonard Jolles (print name of person or entity recorded in Section J) Date: Aug 5 2002

Enter address of the person providing certification(s), including Ability and Willingness Certification where applicable, if different from address recorded in Section J:

Street:

City/Town: State: ZIP Code:

Telephone: Ext.: FAX: (optional)

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YOU MUST COMPLETE ALL RELEVANT SECTIONS OF THIS FORM OR DEP MAY RETURN THE DOCUMENT AS INCOMPLETE. IF YOU SUBMIT AN INCOMPLETE FORM, YOU MAY BE PENALIZED FOR MISSING A REQUIRED DEADLINE, AND YOU MAY INCUR ADDITIONAL COMPLIANCE FEES.