



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

March 31, 2003

By Certified Mail - Return Receipt Requested

Mr. Jeffrey O. Plank
Chairman
Refinity Corporation
37-39 Bubier Street
Lynn, MA 01901

Superfund Records Center

SITE: CENTREDALE MANOR

BREAK: 11.9

OTHER: 274 330

Re: Centredale Manor Restoration Project Superfund Site
North Providence, Rhode Island

Dear Mr. Plank:

On March 3, 2003, the U.S. Environmental Protection Agency ("EPA") issued notice letters to eleven companies informing them that EPA considers them to be potentially liable for the cleanup of environmental contamination at the Centredale Manor Restoration Project Superfund Site in North Providence, Rhode Island ("Site"). The letters were issued based on evidence indicating that these companies sent barrels to New England Container Company when that company operated a barrel recycling business at the Site. One of the notice letters was issued to Eastern Smelting. A copy of that letter was sent to Metallix, as a possible successor to Refinity Corporation. At that time, we did not have an address for Refinity. EPA is now issuing the enclosed notice letter to Refinity.

An informational meeting was held in our offices on Tuesday, March 18. I apologize that you did not receive the enclosed letter in time to attend that meeting. I have enclosed the two handouts provided to the participants during the meeting. I have also enclosed a copy of the attendance sheet. Finally, I have enclosed three computer disks that contain documents that support and describe the investigations and cleanup work performed at the Site to date.

If you have technical questions about the Site, please call Anna Krasko at (617) 918-1232. Legal questions should be directed to me at (617) 918-1089. I believe that the parties have scheduled another meeting in Rhode Island for early April. You may wish to call one of the other participants to obtain further information about the meeting.



Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

SDMS DocID

274330

Thank you for your attention to this important matter.

Sincerely,

A handwritten signature in black ink that reads "Eve S Vaudo". The signature is written in a cursive style with a large, prominent "E" and "V".

Eve Stolov Vaudo

enclosures

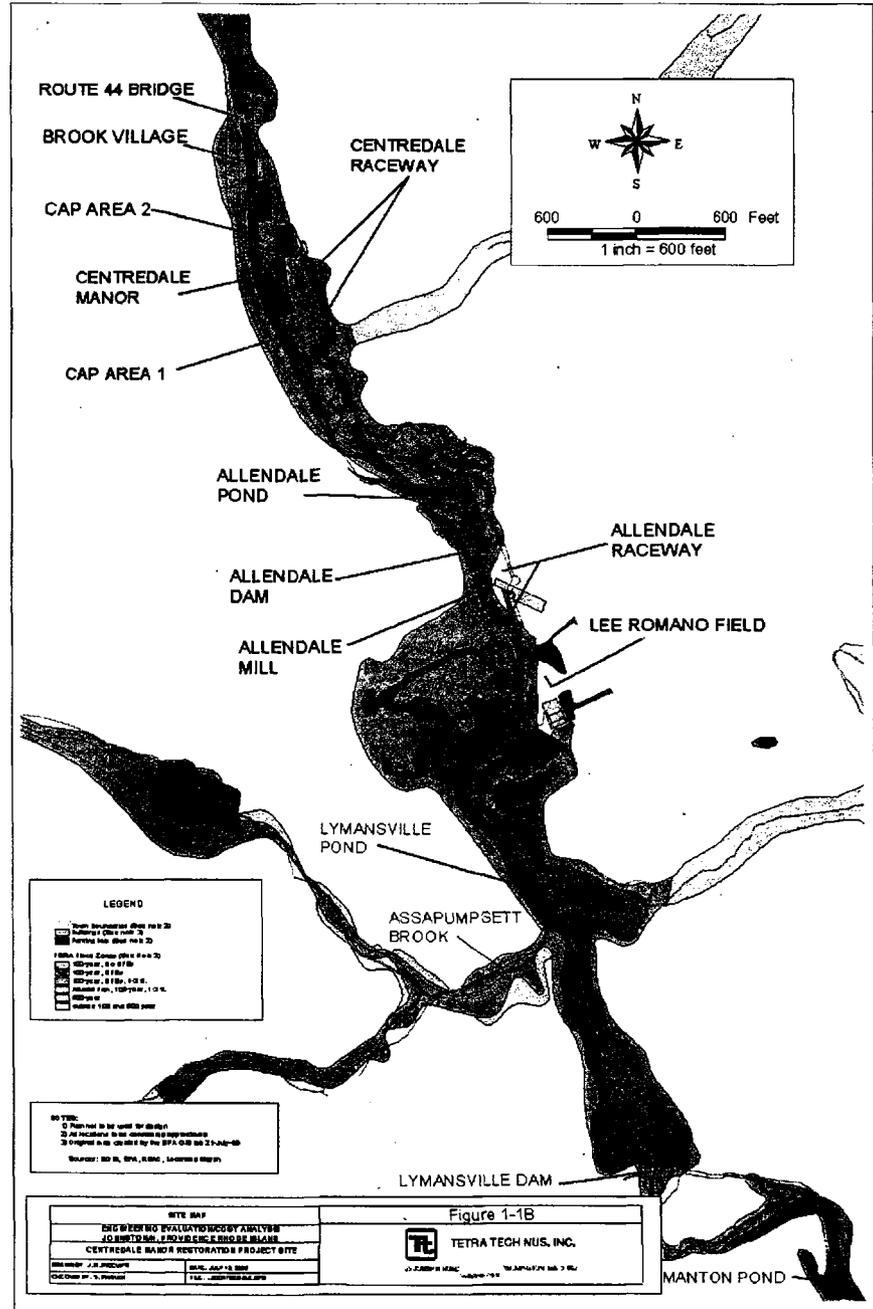
cc: Bret Jedele, RIDEM Legal Services
Louis Maccarone, RIDEM Remedial Project Manager
Eve Vaudo, EPA Office of Environmental Stewardship
Anna Krasko, EPA Remedial Project Manager
Ted Bzenas, EPA On-Scene Coordinator
Bruce Marshall, Chief, EPA Search & Cost Recovery Section
Rudy Brown, EPA Office of Government Relations

**U.S. Environmental Protection Agency
Centredale Manor Restoration Project Superfund Site
Informational Meeting for Generators
March 18, 2003**

- I. Welcome
- II. Site History and Cleanup Activities
- III. Anticipated 2003 Activities
- IV. The Superfund Law
- V. The Identification of Potentially Responsible Parties
- VI. Next Steps
- VII. Where To Go For More Information
- VIII. Questions & Answers



Centredale Manor Restoration Project



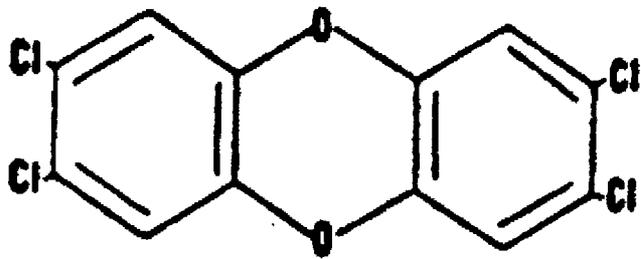


Centredale Manor Site Background

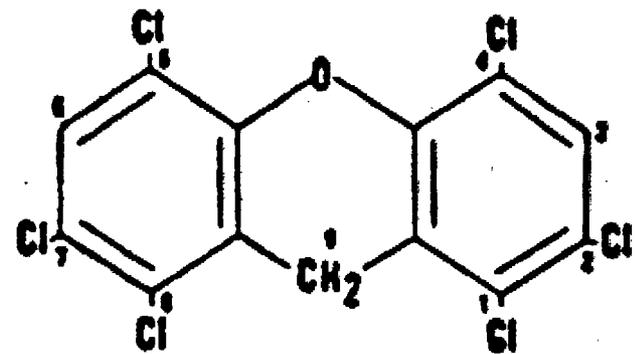
- Chemical company operations
 - 1940s – early 1970s
 - Hexachlorothene production in mid-1960s
- Incinerator-based drum reconditioning
 - 1952-1969
- High-rise elderly housing build after major fire in 1972
 - Brook Village Apartments – 1977
 - Centredale Manor Apartments - 1983

Centredale Manor Site Background (cont.)

- Early EPA activities
 - Screening Site Inspection - 1990
 - Dioxin found in fish in Woonasquatucket River in 1996
 - Expanded Site Inspection (ESI) – 1998
- Site listed on NPL in February 2000



**2,3,7,8-tetrachloro
dibenzo-p-dioxin
(TCDD)**

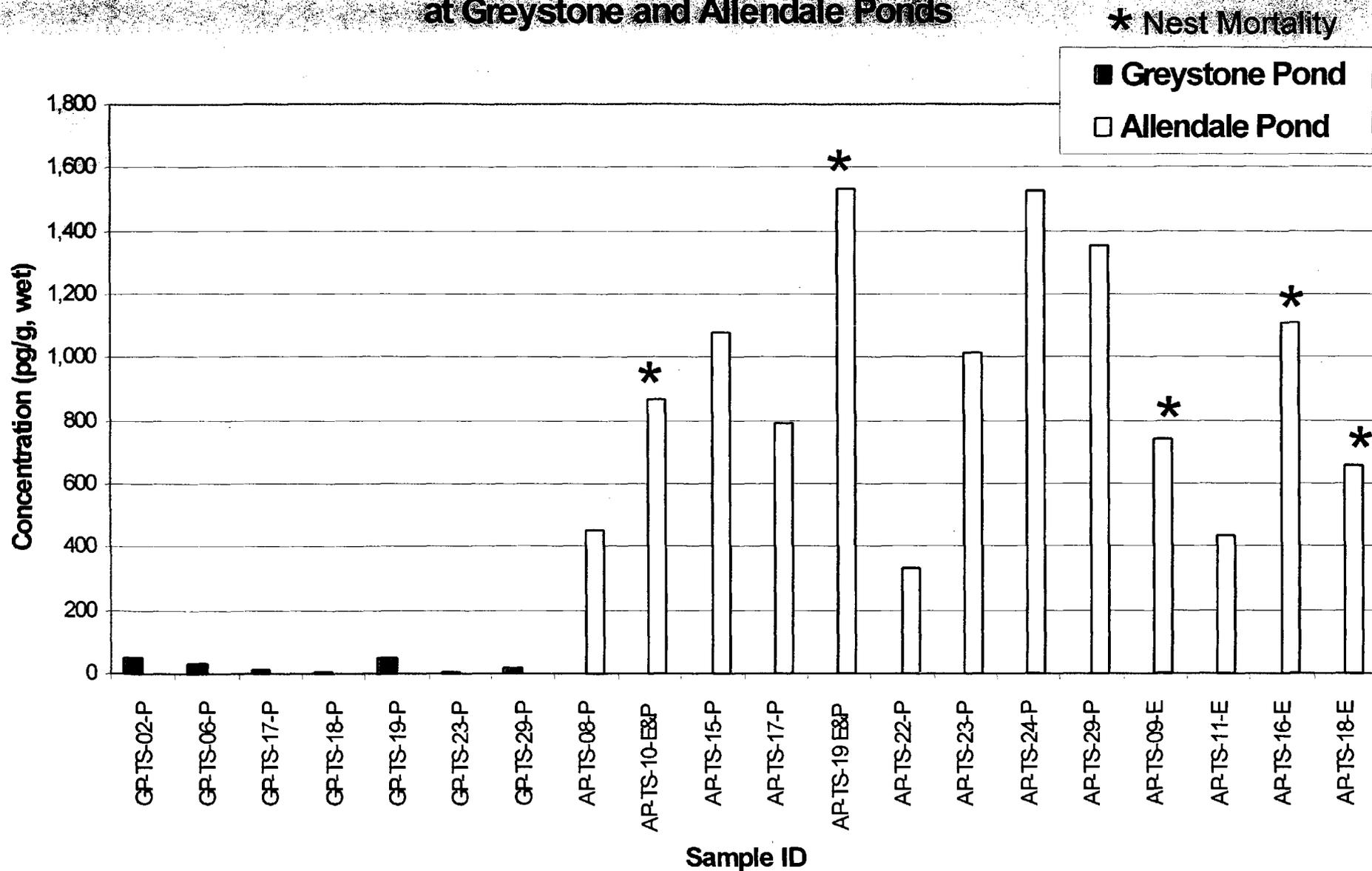


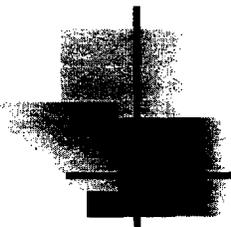
**1,2,4,5,7,8. Hexachloro(9-H)xanthene
(HCX)**

DANGER!



Concentrations of 2,3,7,8-TCDD in Tree Swallow Egg Samples Collected at Greystone and Allendale Ponds

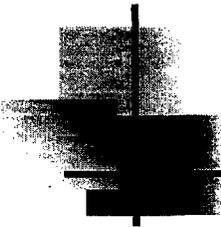




EPA Superfund Responses

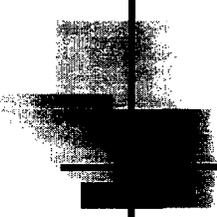
- Time Critical Removal
- Non-Time Critical Removal
- Long-term Remedial Response





Non-Time Critical Removal

- Engineering Evaluation/Cost Analysis**
 - Completed September 2000
 - Public Comment Oct./Nov. 2000
- Action Memorandum January 2001**
- Field Implementation 2002/2003**

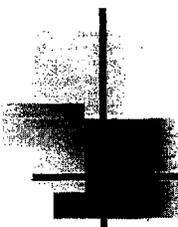


NTCRA

- Restoration of Allendale Dam
 - Completed February 2002
- Excavation of Residential Soils
 - Excavation completed December 2002
 - Disposal of soil to be completed April 2003
- Off-site treatment disposal of sediments and soil

ALLENDALE DAM
Summer 2001 (breached) and February 2002 (restored)





Long-term Remedial Response

- Remedial Investigation (in progress)
- Feasibility Study
- Proposed Plan
- Public Comment
- Record of Decision
- Remedy Implementation

EPA

RI DOH

*Mayor of
North
Providence*

*RI
DEM*

*Management
Action
Committee*

ATSDR

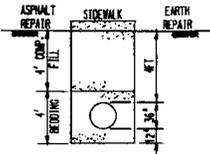
*State
Senator*

*Senator
Chafee*

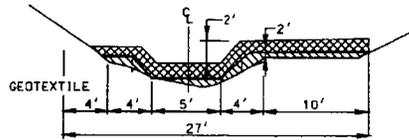
*Mayor of
Johnston*

*RI
Governor's
Office*

*Urban
Rivers
Team*



SECTION-TYPICAL
N.T.S.

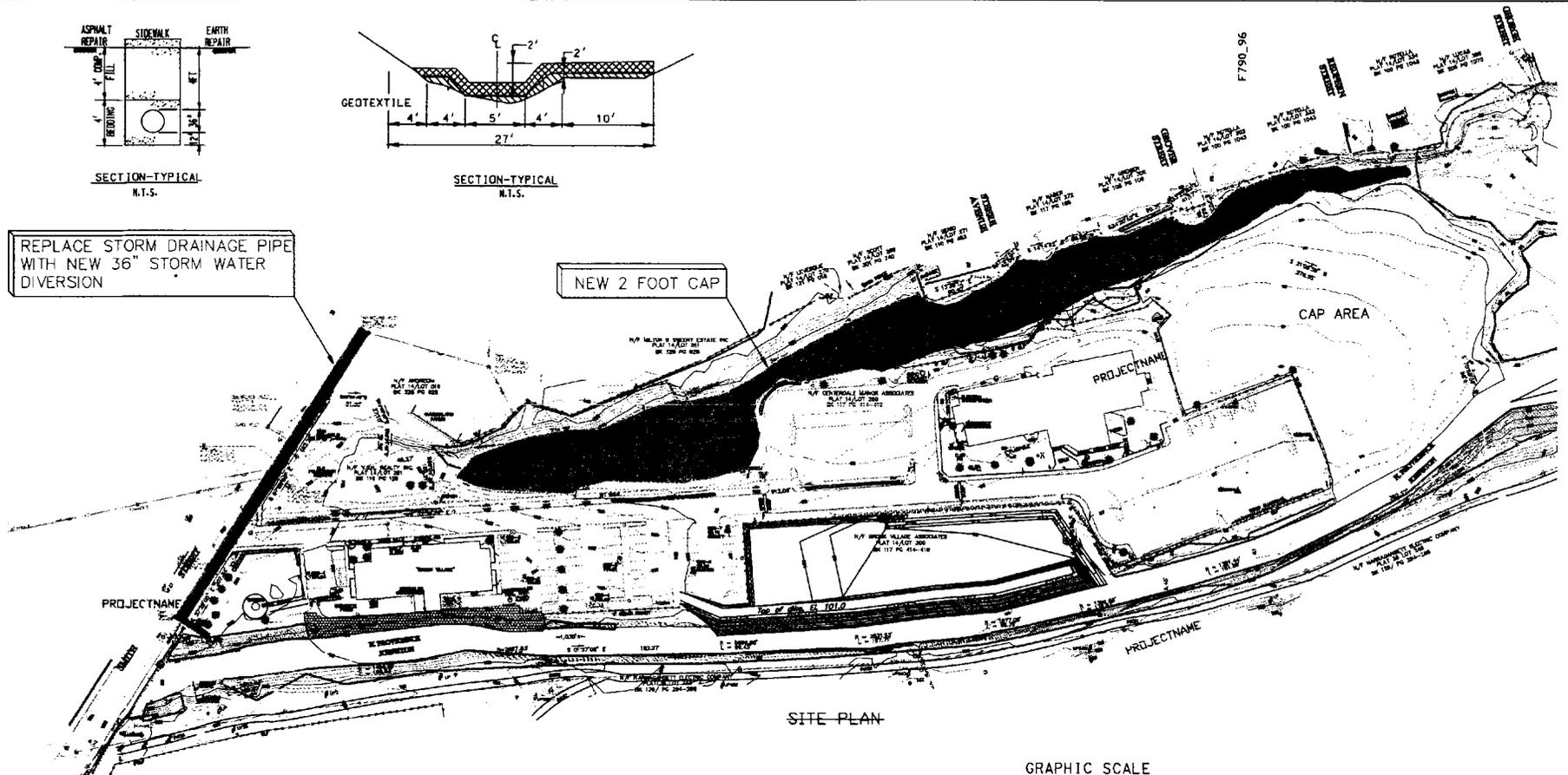


SECTION-TYPICAL
N.T.S.

REPLACE STORM DRAINAGE PIPE
WITH NEW 36" STORM WATER
DIVERSION

NEW 2 FOOT CAP

CAP AREA



SITE PLAN

GRAPHIC SCALE



DEPARTMENT OF THE ARMY NEW ENGLAND DISTRICT CORPS OF ENGINEERS CONCORD, MA	WATER RESOURCES DEVELOPMENT PROJECT CENTREDALE MANOR TAILRACE STORM WATER DIVERSION AND EARTH CAP SITE PLAN	1 <hr/> 2
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SUPERFUND PROGRAM

Program Components

Cleanup - National Contingency Plan

Enforcement - Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)

How Are Sites Cleaned Up?

1. Responsible party performs work pursuant to an agreement with EPA.
(EPA's preferred approach.)
2. No agreement is reached and EPA orders a party to perform work.
3. EPA performs working using Superfund money and then seeks to recover the costs from responsible parties.

What Is A PRP (Potentially Responsible Party)?

1. Current owner or operator of the site
2. Owner or operator of the site at the time of disposal
3. **Generator - Party who arranged for disposal of hazardous substances at the site or arranged for the transportation of hazardous substances to the site**
4. Transporter - Party who selected and transported hazardous substances to the Site

PRPs Are Primarily Responsible For:

1. All cleanup costs incurred by the federal or state government that are not inconsistent with the NCP;
2. Any other necessary response costs incurred by any other person that are consistent with the NCP; and
3. Injury to or loss of natural resources, including costs to assess the injury.

Certain Elements of the Program

- Contribution Actions and Contribution Protection
- Strict Liability/No Fault Statute
- Joint and Several Liability

PRP SEARCH

- Began in 1999
- Examples of Activities
- September 1999 - EPA identified three PRPs
- February 2000 - EPA identified two additional PRPs
- May 2002 - EPA identified one additional PRP
- March 2003 - EPA identified eleven additional PRPs based primarily on information request responses and former employee statements
- The PRP search continues

NEXT STEPS

1. The formation of a PRP Group.
2. Upcoming removal action.
3. Further PRP search work.

WHERE TO GO FOR MORE INFORMATION

1. EPA Website - www.epa.gov/region01/superfund/resource/centredale.htm
2. EPA Records Center - (617) 918-1440
3. North Providence Union Free Library, North Providence, RI
4. Marion J. Mohr Memorial Library, Johnston, RI
5. EPA Representatives

Technical Questions

About the Removal Work:

Ted Bzenas, On-Scene Coordinator
(617) 918-1230

Technical Questions:

Anna Krasko, Remedial Project Manager
(617) 918-1232

Legal Questions:

Eve Vaudo, Attorney
(617) 918-1089

US EPA
Centredale Manor Restoration Project Superfund Site
Informational Meeting for Generators
Tuesday, March 18, 2003

(please print)

Name	Affiliation	Address	Telephone
Grace M Donnelly	(ECCO)	Providence RI	401.273-2525
BARRY S. SHEPARD	EISSERA	PROVIDENCE	401-331-9000
Richard Malachowski	Cranston Print	Cranston RI	401-943-480
Jennifer Cervenk	Providence, RI		401-824-5109
Nick Longo	Unocal Corp.	Chicago IL	847-310-6821
Rick Rifici	BRADFORD SOAP	CR. CO. PROVIDENCE RI	401-381-6079
DAVID GRAHAM	CELANESE	KAUFMAN & CANOLES 1200 Old Colony Ln Williamstown MA 01267	757 259 3855
Andrew W. Davis	organic P, solvent	Providence RI	401-273-9000
Sharon Fennelly	EPA		617-918-1263
James Mawsky	CISA SPECIALTY CHEMICALS		914 785-2567

US EPA
Centredale Manor Restoration Project Superfund Site
Informational Meeting for Generators
Tuesday, March 18, 2003

(please print)

Name	Affiliation	Address	Telephone
Stuart DeGas	Robinson & Cole LLC	Shrewsbury CT	(203) 422-7506
David Scott	LOUREIRO ENGINEERING	PLAINVILLE CT 1301 "K" ST NW Suite 800-EE	800-747-6018
Coke Cherney	Ropes & Gray	Wash DC 20005 3000 K ST NW	202-626-3914
N.A. FITCH	SWIDLER BERLIN	W - DC 20007	(202) 424-7695
Laine Burt	Foley Hoag	155 Leupold Blvd. Boston MA 02110	617/832-1111
SCOTT MILLER	LOUREIRO ENGINEERING ASSOC.	100 NEW WEST DR. PLAINVILLE, CT 06062	(860) 410-2958

US EPA
Centredale Manor Restoration Project Superfund Site
Informational Meeting for Generators
Tuesday, March 18, 2003

(please print)

Name	Affiliation	Address	Telephone
RICHARD SHERMAN	COUNCIL FOR BRADFORD SOA	EDWARDS ANGELL 2800 FINANCIAL PLAZA PROVIDENCE RI 02902	401- 276-6512
TED BARENAS	EPA DC	1 Congress St Boston	617-918-1230
Anna Krasko	EPA	1 Congress St. Boston	617-918-1232
Eve Vaudo	EPA	1 Congress St. Boston	617-918-1089
Luzela Bonarigo	EPA	"	617-918-1034



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

March 31, 2003

Eastern Smelting/Refinity
c/o Jeffrey O. Plank
Refinity Corporation
37-39 Bubier Street
Lynn, MA 01901

Re: Notice of Potential Liability for Centredale Manor Restoration Project Superfund Site,
North Providence, Rhode Island

Dear Mr. Plank:

This letter serves to formally notify Eastern Smelting/Refinity Corporation of the potential liability which it has or may have incurred with respect to the Centredale Manor Restoration Project Superfund Site in North Providence, Rhode Island ("Site"). In addition, this letter requests that you pay certain costs related to the Site and that you prepare to participate in the conduct or financing of certain clean-up activities at the Site.

NOTICE OF POTENTIAL LIABILITY

The U.S. Environmental Protection Agency ("EPA") has documented the release or threatened release of hazardous substances, pollutants or contaminants at the Site. EPA has spent and is considering spending public funds on actions to investigate and control such releases or threatened releases. Unless EPA reaches an agreement under which a responsible party or parties such as yourself will properly perform or finance such actions, EPA may itself perform these actions or order responsible parties to perform these actions pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. §§ 9601 et seq. ("CERCLA").

Under Sections 106(a) and 107(a) of CERCLA, 42 U.S.C. §§ 9606(a) and 9607(a), and other laws, responsible parties may be obligated to undertake actions deemed necessary by EPA to protect the public health, welfare or environment. Responsible parties may also be liable for all costs incurred by the government in responding to any release or threatened release at the Site. Such costs may include, but are not limited to, expenditures for investigation, planning, clean-up response and enforcement activities. In addition, responsible parties may be required to pay damages for injury to, destruction of, or loss of natural resources, including the costs to assess such damages.

Toll Free • 1-888-372-7341

Internet Address (URL) • <http://www.epa.gov/region1>

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on Recycled Paper (Minimum 30% Postconsumer)

Responsible parties under CERCLA include persons who are current or former owners and/or operators of a site, persons who arranged for disposal of hazardous substances at a site, or persons who accepted hazardous substances for transport to a site selected by such persons.

EPA has evaluated a large body of evidence in connection with its investigation of the Site, including witness interviews; written statements and administrative depositions from persons familiar with activities at the former chemical and drum recycling companies that operated at the Site; and responses to CERCLA Section 104(e) information requests. Based on this evidence, EPA has information indicating that you are a potentially responsible party ("PRP") with respect to this Site. Specifically, EPA has reason to believe that you arranged by contract, agreement or otherwise for disposal or treatment, or arranged with a transporter for transport for disposal or treatment of hazardous substances found at the Site.

By this letter, EPA notifies you of your potential liability with regard to this matter. EPA also encourages you, as a PRP, to reimburse EPA for the costs incurred to date as set out below, to participate in a "General Notice Meeting" as described below, and to prepare to voluntarily perform or finance future response activities which EPA determines are necessary to address the contamination at the Site.

DEMAND FOR PAYMENT OF COSTS

In accordance with CERCLA and other authorities, EPA has undertaken certain actions and incurred costs in response to conditions at the Site. These response actions are described below. The costs to date associated with these actions are approximately \$11,340,000, excluding interest. EPA anticipates that it will expend additional funds for response activities at the Site under the authority of CERCLA and other laws, including those response activities described below.

In accordance with Section 107(a) of CERCLA, 42 U.S.C. § 9607(a), demand is hereby made for payment of the above amount, and all interest authorized to be recovered under that Section or under any other provisions of law. Demand is also hereby made under these authorities for payment of all future costs, and interest thereon, that EPA may accrue in regard to the Site.

In the event the addressee of this notice intends or has already filed for dissolution or reorganization under bankruptcy laws, you are hereby requested to include EPA-Region I and the United States Department of Justice on any mailing or notice lists used in that proceeding. The United States reserves the right to file a proof of claim or application for reimbursement of administrative expenses in such a proceeding.

RESPONSE ACTIVITIES AT THE SITE

EPA has conducted or is planning in the future to conduct the following activities at the Site:

1. Previous Site activities:

Previous activities by EPA

- established site security;
- restricted access to contaminated soils;
- conducted certain characterization activities to assist in determining the extent of contamination at the Site;
- installed one and partially installed a second interim cap over two contaminated soil areas at the Site; and
- conducted an Engineering Evaluation/Cost Analysis for addressing the breached Allendale dam and contaminated soil and sediment on residential-use properties.

Previous activities by PRPs

- completed installation of a second interim cap over a contaminated soil area at the Site; and
- completed the restoration of the Allendale Dam.

2. Current Site activities:

Current activities by EPA

- a remedial investigation to identify the characteristics of the Site, to define the nature and extent of soil, sediment, air, surface water and ground water contamination at the Site; and to characterize the risk posed by the Site;
- a feasibility study to evaluate a number of different means for addressing the contamination at the Site and the risk posed by that contamination; and
- a continuing search for additional PRPs.

Current activities by PRPs

- sampling and analysis and excavation and off-site disposal of contaminated soils and sediments located in areas accessible by residential and recreational users.

3. Future Site activities:

Future work at the Site may include removal actions to address any remaining sources of contamination. Future work shall also include the design and implementation of the remedial action to be selected and approved by EPA for the Site and any operation, maintenance and monitoring activities necessary at the Site.

In addition to those activities enumerated above, EPA may, pursuant to its authorities under CERCLA and other laws, decide that other studies or clean-up activities are necessary to protect public health, welfare or the environment.

FUTURE SPECIAL NOTICE AND NEGOTIATION MORATORIUM

At an appropriate point in the future, EPA will send to you, or a person you designate to

represent you, a notice informing you that one or more of the above activities is pending and that your cooperation is being requested to negotiate an agreement to perform or finance those activities.

This forthcoming notice will tell you whether EPA has decided to use the "Special Notice" procedures pursuant to CERCLA Section 122(e), 42 U.S.C. § 9622(e), to formally negotiate the terms of a consent order or consent decree to conduct or finance response activities at the Site. If EPA does not use Section 122(e) Special Notice procedures, the notice will explain to you why EPA has determined that those procedures are not appropriate for this Site.

If EPA chooses to employ the Special Notice procedures under Section 122(e) CERCLA, that notice will commence formal negotiations between EPA and the PRPs. This notice will also trigger a moratorium on certain EPA activities at the Site. The purpose of the moratorium is to provide a period of time when PRPs and EPA may negotiate a settlement.

INFORMATION TO ASSIST POTENTIALLY RESPONSIBLE PARTIES

GENERAL NOTICE MEETING

EPA will hold a meeting for all those parties sent this notice on **Tuesday, March 18, 2003, at 1:00 p.m.** at the following location:

1 Congress Street - 11th Floor
Boston, Massachusetts

At this meeting, representatives of EPA will discuss EPA's activities at the Site to date, and its planned future activities. EPA will also provide you with additional information about the proposed removal activities. EPA will answer questions you may have regarding the Site or this notice letter. At the end of EPA's portion of the meeting, we will make a room available for the recipients of this letter to meet with the representatives of the existing PRPs.

For security purposes, we must provide our building security with the names of all visitors in advance. Please call Lauren O'Neill at (617) 918-1730 by noon on Monday, March 17, 2003, with the names of all individuals who will be attending the meeting. Please also provide the name of the company or firm with whom the person is associated.

SITE INFORMATION

In order to encourage you to meet with other PRPs and to begin organizing yourselves for future negotiations with EPA, the following information has been attached to this letter:

1. A list of the names and addresses of PRPs to whom this notification is being provided. This list represents EPA's preliminary findings on the identities of PRPs. Inclusion on or exclusion from the list does not constitute a final determination by the Agency concerning

the liability of any party for response actions at the Site (Enclosure A).

2. A list of contacts for PRPs previously identified for this Site (Enclosure B).
3. An evidentiary summary which sets forth the documentary evidence which indicates, along with other investigatory information gathered by EPA, that you are a PRP for this Site (Enclosure C).

In most cases, EPA seeks an active dialogue with PRPs regarding the search for additional PRPs. If you have evidence regarding the liability of any party for response actions at the Site which has not already been provided to EPA, you should provide that information no later than thirty (30) days from the date of this letter. In addition, if you are interested in participating in the search for additional PRPs, you should contact members of the EPA case team, listed below, for guidance on how you can best target your efforts. You should note that any evidence which you gather and offer to EPA regarding other PRPs will be subject to independent evaluation by EPA. Therefore, this evidence must be reliable and sufficiently detailed to be verified by EPA.

ORPHAN SHARE INFORMATION

Pursuant to the Superfund Reforms, when EPA enters into certain settlements, EPA may compensate settlors for a portion of the shares specifically attributable to insolvent and defunct PRPs ("orphan share"), if any. EPA believes that there may be PRPs at this Site who are insolvent or defunct. If in the future you, either individually or with other PRPs, enter into a cost recovery or RD/RA settlement with EPA and provide sufficient information about the existence, liability, and relative shares of responsibility of insolvent and defunct PRPs, EPA will analyze the information and determine whether to consider the shares of these parties in the amount of past costs and future oversight costs which EPA will seek to recover in such settlement.

STEERING COMMITTEE

EPA recommends that all PRPs form a single steering committee to negotiate on behalf of the entire group of PRPs, and to otherwise pursue the interests of the PRPs. Establishing an effective steering committee, which represents the different interests of all of the PRPs at the Site, is a critical component of the negotiation process.

EPA recognizes that the organization of a steering committee and the allocation of responsibility among PRPs may be difficult. If PRPs are unable to organize an effective steering committee or to reach consensus among themselves, we encourage the use of the services of a neutral third party to facilitate negotiations. If requested, EPA can provide a list of experienced third-party neutrals and help arrange for the PRPs to meet with such a neutral.

ADMINISTRATIVE RECORD

In accordance with Section 113(k) of CERCLA, EPA must establish an administrative record

containing the documents used by EPA to select the appropriate response action for the Site.

The administrative record is available to the public for inspection at:

EPA Records Center
1 Congress Street
Boston, MA 02114-2023
Telephone No. 617-918-1440.

Please call the EPA Records Center for current hours and directions.

This administrative record is also available at North Providence Union Free Library, 1810 Mineral Springs Ave., North Providence RI 02911 and Marion J. Mohr Memorial Library, 1 Memorial Avenue, Johnston, RI 02919.

In addition, this administrative record is available at
<http://www.epa.gov/region01/superfund/resource/centredale.htm>.

TIMING AND FORM OF RESPONSE TO THIS LETTER

As a PRP, you should notify EPA in writing within 30 days from the date of this letter of your receipt of this letter, and your willingness to join the other PRPs in addressing the contamination at the Site, and in paying EPA's outstanding response costs set out in this letter. Your response should indicate the appropriate name, address, and telephone number for further contact with you. If you are already involved in discussions with state or local authorities, engaged in voluntary clean-up action, or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you with respect to any such activities. EPA requests that you report the status of such Site-related activities in your response to this letter.

Your response letter should be sent to:

Anna Krasko
U.S. Environmental Protection Agency
Office of Site Remediation and Restoration
1 Congress Street, Suite 1100 (HBO)
Boston, MA 02114-2023

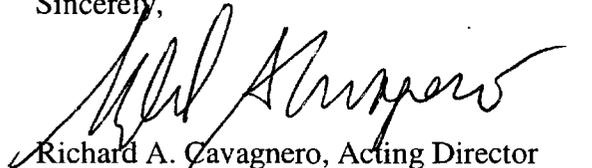
If EPA does not receive a timely response to this letter, EPA will assume that you do not wish to negotiate a resolution of your liabilities in connection with the Site and that you have declined any involvement in performing the response activities, and paying outstanding costs.

If you have questions regarding the Site or this notice letter, please contact Anna Krasko at (617) 918-1232. If you have an attorney representing you in this matter, please direct his or her

questions to Eve Vaudo of the EPA Office of Environmental Stewardship at (617) 918-1089.

The factual and legal discussions in this letter are intended solely to provide notice and information, and such discussions are not to be construed as a final agency position on any matter set forth herein. Due to the seriousness of the environmental and legal problems posed by conditions at the Site, EPA urges that immediate attention and a prompt response be given to this letter.

Sincerely,



Richard A. Cavagnero, Acting Director
Office of Site Remediation and Restoration

Enclosures

cc: Bret Jedele, RIDEM Legal Services
Louis Maccarone, RIDEM Remedial Project Manager
Eve Vaudo, EPA Office of Environmental Stewardship
Anna Krasko, EPA Remedial Project Manager
Ted Bazenas, EPA On-Scene Coordinator
Bruce Marshall, Chief, EPA Search & Cost Recovery Section
Rudy Brown, EPA Office of Government Relations

ENCLOSURE A

CONTACTS FOR GENERAL NOTICE LETTER RECIPIENTS

1. For American Hoechst Corporation

American Hoechst Corporation n/k/a CNA Holdings, Inc.
c/o Celanese Americas Corporation
86 Morris Avenue
Summit, NJ 07901

Contact: Gary M. Rowen
Assoc. General Counsel and
Corporate Vice President of Environment, Health and Safety.

2. For American Mineral Spirits Company

American Mineral Spirits Company
c/o Union Oil Company of California d.b.a. Unocal
2300 Barrington Road, Suite 500
Hoffman Estates, IL 60195

Contact: Theodore C. Hadley, Contract Attorney

3. For Ciba Geigy

Ciba Geigy
c/o Ciba Specialty Chemicals
540 White Plains Road
Tarrytown, NY 10591-9005

Contact: Anne Christien, Manager Regulatory Compliance

4. For Cranston Print Works Company

Cranston Print Works Company
1381 Cranston Street
Cranston, RI 02920

Contact: George W. Shuster, Chief Executive Officer

5. For Eastern Color and Chemical Company

Eastern Color and Chemical Company
35 Livingston Street
Providence, RI 02904

Contact: Barry S. Shepard, President

6. For Eastern Smelting

Eastern Smelting/Refinity
c/o Metallix, Inc.
Foot of Jersey Avenue
Jersey City, NJ 07302

Eastern Smelting/Refinity
c/o Jeffrey O. Plank, Chairman
Refinity Corporation
37-39 Bubier Street
Lynn, MA 01901

7. For Organic Dyestuffs Corporation

Organic Dyestuffs Corporation
65 Valley Street
East Providence, RI 02914

Contact: Gregory M. Gormley, President

Contact: Andrew W. Davis
Henry M. Swan
Davis, Kilmarx, Swan & Bowling, LLP
101 Dyer Street
Providence, RI 02903

8. For The Original Bradford Soap Works, Inc.

The Original Bradford Soap Works, Inc.
P.O. Box 1007
200 Providence Street
West Warwick, RI 02893

Contact: Stephen B. Forman, Chief Financial Officer

Contact: Richard A. Sherman, Esq.
Edwards & Angell LLP
2800 Financial Plaza
Providence, RI 02903

9. For Warwick Chemical Company

Warwick Chemical Company
c/o Sequa Corporation
3 University Plaza, Suite 300
Hackensack, NJ 07601

Contact: Leonard P. Pasculli, Esq.
Senior Associate General Counsel.

10. For T.H. Baylis, Co.

T.H. Baylis Co.
n/k/a THBC, Inc.
c/o Stanwich Partners, Inc.
One Stamford Landing
62 Southfield Avenue
Stamford, CT 06902

Contact: Charles E. Bradley, President

Contact: Scott Junkin, Esq.
Scott A. Junkin PC
One Stamford Lane
62 Southfield Avenue
Stamford, CT 06902

11. For Teknor Apex Company

Teknor Apex Company
505 Central Ave.
Pawtucket, RI 02861

Contact: Jonathan D. Fain, President
David Yopak, EHS Director

ENCLOSURE B

CONTACTS FOR EXISTING PRPs

For Brook Village Associates Limited Partnership:

Colburn T. Cherney
Ropes & Gray
One Franklin Square
1301 K Street, NW, Suite 800 East
Washington, D.C. 20005-3333
PH 202-626-3900
FAX 202-626-3961

Howard Castleman
Murtha Cullina Roche Carens & DeGiacomo
99 High Street
Boston, MA 02110
PH 617-457-4000
FAX 617-482-3868

For Centerdale Manor Associates Limited Partnership (C/S Housing Associates):

Leonard H. Freiman
Goulston & Storrs, A Professional Corporation
400 Atlantic Avenue
Boston, MA 02110-3333
PH 617-482-1776
FAX 617-574-4112

For Centerdale Manor Associates Limited Partnership (Centerdale Associates):

Richard J. Welch
Moses & Alfonso, Ltd.
170 Westminster Street, Suite 201
Providence, RI 02903
PH 401-453-3600
FAX 401-453-3604

Laurie Burt
Foley, Hoag & Eliot LLP
One Post Office Square
Boston, Massachusetts 02109
PH 617-832-1000
FAX 617-832-7000

For Emhart Industries, Inc.

Jerome C. Muys, Jr.
Swidler Berlin Shereff Friedman LLP
3000 K Street, NW, Suite 300

Washington DC 20007-5116
PH 202-424-7547
FAX 202-424-7643

Warren Anthony Fitch
Swidler Berlin Shereff Friedman LLP
3000 K Street, NW, Suite 300
Washington DC 20007-5116
PH 202-424-7695
FAX 202-424-7643

For New England Container Company, Inc.:

Stuart R. Deans, Esq.
Robinson & Cole LLP
Financial Centre
695 East Main Street
P.O. 10305
Stamford, CT 06904-2304
PH 203-462-7500
FAX 203-462-7599

For Crown Metro, Inc.

Knox L. Haynsworth, III
Brown, Massey, Evans, McLeod & Haynsworth, P.A.
P.O. Box 2464
Greenville, SC 29602
PH 864-271-7424
FAX 864-242-6469

For Bernard V. Buonanno, Sr.

Deming Sherman, Esq.
Edwards & Angell, LLP
2800 BankBoston Plaza
Providence, Rhode Island 02903-2499
PH 401-276-6443
FAX 401-276-6611

ENCLOSURE C

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

**Eastern Smelting
c/o Metallix, Inc.
Foot of Jersey Avenue
Jersey City, NJ 07302**

Contact: Pam Rollins, President

**c/o Refinity Corporation
37-39 Bubier Street
Lynn, MA 01901**

Contact: Jeffrey O. Plank

Evidentiary Summary

New England Container Company, Inc. ("NECC") operated a drum recycling business at 2074 Smith Street in North Providence, Rhode Island from approximately 1952 to approximately mid-1971. This property is now part of the Centredale Manor Restoration Project Superfund Site ("Site").

In the 1960s (and possibly earlier), NECC had an arrangement with a competitive barrel recycler, owned by Milton Isserlis, pursuant to which NECC paid Mr. Isserlis 25 cents for each barrel NECC purchased from one of the competitor's customers. Eastern Smelting was one such customer. This arrangement is shown in the documents attached to this summary. According to these documents, Eastern Smelting contributed at least 1,300 drums to the Site in the late 1960s and early 1970s.

EPA has requested and received information from NECC about its operations. In addition, EPA personnel have interviewed many former employees of NECC. From these activities, EPA has learned about NECC's operations at the Site, and has concluded that those operations resulted in contamination. NECC received drums by truck. The drums were then unloaded and stacked on the ground. The contents of some of the drums leaked onto the ground. Drums were then placed upside down on a conveyor belt inside a furnace. The drum contents either drained into a pit located under the conveyor belt or were burned out. Ash from the incineration process either fell into the pit or was swept into the pit. (The liquid contents of some drums may have been emptied into other drums or onto the ground before being placed on the conveyor belt.) The contents of the pits were emptied periodically into drums. Those drums or the contents of those drums were then taken to an area south of the facility (but still within the Site property) and dumped. Residents living near the Site observed the dumping of drums in this area. In addition, residents observed bulldozers burying drums into the ground.

Subsequent to the early 1970s, Eastern Smelting became known as Refinity. In November 2002, Refinity sold some assets to Metallix, Inc.

M. J. Farrell

FORM 20-4 U.S.A.

July 19	Geigy 2103	52575	July 9/69 #5834	55075
	Banner 100-	25-		
July 19	Geigy 2123-	53075	Aug 4/69 #5935	60575
	Banner 100-	75-		
Aug 19	Geigy 127	20675	Sept 3/19	20675
	Banner		6023	
	Eastern			
Sept 19	Geigy 2004 @ .25	501-	Oct 6/19 #6154	501-
	Banner			
	EASTERN SM.			
Oct 19	Geigy 2302 @ .25	575.50	Nov 5/19 #6331	62550
	Banner 100	25.00		
	EASTERN SMELTING 100	25.00		
		625.50		
Nov	Geigy Chem 2078	519.50		
	Banner 100	25-		
	Eastern Smelting			
		544.50	Dec 8/69 #6322	544.50
				2034.25
Dec 69	Geigy Chem 2325	581.25	1/70	
	Banner			
	Eastern Smelting 100	25-	Jan 6643	606.25
Jan 70	Geigy 3122	905.50	Feb 9/70 #6851	905.50
	Banner			
	Eastern			
Feb 70	Geigy 2549	637.25	Mar 6/70 #7038	662.25
	Banner 100	25-		
	Eastern			
		662.25		

70

Mar/70	guy	3049	76225		1
	Eastern	100	25		2
			78725	ago 7 #7208	3
					4
Apr 70	guy	2411			5
	EAST				6
	STATION	75			7
	TANNE	2	673-	May 6/70 +7373	8
				673	9
May/70	guy	2711	67775	6/11	10
	EAST			7575	11
	TANNE			67775	12
					13
June 70	guy	3524			14
	TANNE	100	881-	July 8/70 #7930	15
				881	16
					17
July 70	guy	3884			18
	EAST				19
	SMELTIF	125	100225	Aug 11/70	20
		4009		100225	21
Augst	guy	1295	31875	9/10/70	22
	EAST			8065	23
	TANNE	2		31875	24
Sept	guy	5702			25
	EAST				26
	TANNE				27
Oct 70	guy	3435			28
	TANNE	100			29
					30
Nov 70	guy	3187			31
	EASTERN	100			32
		3287			33
Dec/70					34
					35
					36

P A I D

JAN 29 1971

N.E. ... 88175 ... 88175

8477
Oct 8/70 # 925.00

Nov 20 # NOV 88375

82175 Dec 7/70 #8675 82175

86970 Jan 1/71 #8968 86970

Milton Isserlis

FORM 20-4 U.S.A.

1971

Date	Drums	Amount	Date Paid	Check No
1 Jan 31	Keigy - 3715 @ .25			
2	Eastern Smelting - 96 @ .25			
3	3811 @ .25	952.75	2/25/71	9173
4				
5 Feb 28	Keigy - 3649 @ .25	912.25	3/17/71	9300
6				
7 Mar 31	Keigy - 5085 @ .25			
8	Eastern Smelting - 119 @ .25	1301-	4/14/71	9488
9				
10 Apr 30	Keigy - 4689 @ .25			
11	Panner - 50 @ .25	1034.75	6/2/71	9802
12				
13 May 31	Keigy - 4059 @ .25			
14	Panner - 50 @ .25	1027.25	6/21/71	9928
15				
16 June 30	Keigy - 4077 @ .25			
17	Panner - 100 @ .25			
18	Eastern Smelting - 100 @ .25	1069.25	7/26/71	10150
19				
20 July 30	Keigy - 3633 @ .25	908.25	8/25/71	10337
21	Keigy - 127 @ .25	31.75		
22				
23 Aug 31	Keigy - 1806 @ .25			
24	Panner - 50 @ .25			
25	Eastern Smelting - 100 @ .25	489-	Sept 17/71	10483
26				
27 Sept 30	Keigy - 3080 @ .25	770-	October 22	10724
28				
29 Oct 30	Keigy - 2869 @ .25			
30	Panner - 50 @ .25	22.75	November 15	10839
31				
32 Nov 30	Keigy - 2474 @ .25			
33	Eastern Smelting - 100 @ .25	643.50	December 13	10993
34		<u>10239.00</u>	repeated 71	
35 Dec 31	Keigy - 2270 @ .25		#11153	
36	Eastern Smelting - 100 @ .25	592.75	Jan 2/72	5925

Form 1099—U.S. INFORMATION RETURN FOR CALENDAR YEAR 1969

**Copy C
For Payer's Record**

SPD 16-80231-1

INTEREST						
1. Gross dividends and other distributions on stock	2. Earnings from savings and loan associations, credit unions, etc.	3. Other interest. Do not include amounts reportable in column 2	4. Patronage dividends and certain other distributions by co-operatives	5. Rents and royalties	6. Annuities, pensions, and other fixed or determinable income	7. Commissions, fees, prizes and awards, etc., to nonemployees, and foreign items. (No Form W-2 items)
						\$3,034.25

Type or print taxpayer identifying number →

Milton Isserlis

05-0268961
New England Container Co. Inc.,
2072 Smith St.
Centredale R.I. 02911

TO WHOM PAID Type or print name and address (include ZIP code). If account is for multiple payees with different surnames or it includes the name of a fiduciary, trust, or estate, designate the name of the individual or entity to whom the identifying number belongs.

BY WHOM PAID (Name, address (include ZIP code), and identifying number)
U.S. Treasury Department, Internal Revenue Service

Form 1099—U.S. INFORMATION RETURN FOR CALENDAR YEAR 1971

**Copy C
For Payer's Record**

1. Gross dividends and other distributions on stock	INTEREST		4. Patronage dividends and certain other distributions by cooperatives	5. Rents and royalties	6. Other fixed or determinable income	7. Commissions, fees, prizes and awards, etc., to nonemployees, and foreign items. (No Form W-2 items)
	2. Earnings from savings and loan associations, credit unions, etc.	3. Other interest on bank deposits, etc. Do not include column 2 amounts				
						\$10,739.20

Type or print taxpayer identifying number →

.Milton. Isserlis

05-0268961
New England Container Co. Inc
PO Box 403A
Esmond, R.I. 02917

PAID TO

PAID BY

Department of the Treasury—Internal Revenue Service

Earnings
on Jovels
1971

86	9.7	*
95	2.7	5
91	2.2	5
1.3	1.0	5
1.0	3.4	5
1.0	2.7	5
1.0	6.9	5
94	0.0	5
48	9.0	5
77	0.0	5
72	9.7	5
64	3.5	5
10.7	3.9	5*

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

- 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.

A. Received by (*Please Print Clearly*)

B. Date of Delivery

C. Signature

X

- Agent
- Addressee

D. Is delivery address different from item 1?

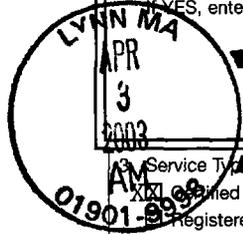
Yes

IF YES, enter delivery address below:

No

1. Article Addressed to:

Mr. Jeffrey O. Plank
 Chairman
 Refinity Corporation
 37-39 Bubier St.
 Lynn, MA 01901



3. Service Type

- Registered Mail
- Insured Mail
- Express Mail
- Return Receipt for Merchandise
- C.O.D.

4. Restricted Delivery? (*Extra Fee*)

Yes

2. Article Number (*Copy from service label*)

7001 1140 0000 6591 6706

PS Form 3811, July 1999

Domestic Return Receipt

102595-99-M-1789



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

• Sender: Please print your name, address, and ZIP+4 in this box •

Eve Vaudo, SES
U.S. EPA
1 Congress St.
Boston, MA 02114-2023



22



U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7001 1140 0000 6591 6706

7001 1140 0000 6591 6706

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

Sent To
Mr. Jeffrey O. Plank, Chairman, ReFinity Corporation
Street, Apt. No.,
or PO Box No. 37-39 Bubber St.
City, State, ZIP+ 4 Lynn, MA 01901

Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A signature upon delivery
- A record of delivery kept by the Postal Service for two years

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail or Priority Mail.
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.