



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
1 CONGRESS STREET, SUITE 1100
BOSTON, MA 02114-2023

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

March 3, 2003

American Hoechst Corporation n/k/a CNA Holdings, Inc.
c/o Gary M. Rowen, Assoc. General Counsel and
Corporate Vice President of Environment, Health and Safety
Celanese Americas Corporation
86 Morris Avenue
Summit, NJ 07901

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

Dear Mr. Rowen:

This letter serves to formally notify American Hoechst Corporation of the potential liability which it has or may have incurred with respect to the Centredale Manor Restoration Project Superfund Site, 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, as discussed further below.

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.

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

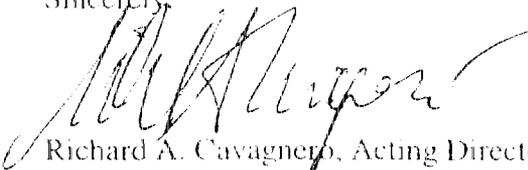
If EPA does not receive a timely response to this letter, EPA will assume that you do not wish to

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

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

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.

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 response to EPA's request for information, Celanese Americas Corporation states that American Hoechst operated a plant located at 500 Washington Street in Coventry, Rhode Island during this time period. (Celanese response.) The Coventry plant manufactured dyes, pigments, chemical intermediates and pharmaceuticals between 1948 and 1997. (Celanese response.) Raw materials used at the Coventry facility included chlorobenzene, nitrobenzene, ethanol, sulfuric acid, methanol, hydrochloric acid and nitric acid. (Celanese response.)

EPA has requested and received information from NECC about its operations. In addition, EPA personnel have interviewed many former employees of NECC. Two of the former NECC employees interviewed as part of this investigation drove trucks for NECC as part of their duties. One such truck driver was employed by NECC from about 1956 to about 1969. He drove a truck for about six of those years. According to this individual, once or twice a week, he would obtain 150 barrels from Hoechst Chemical in Arctic, Rhode Island, off Rt 117, which contained dye powder residues. He delivered the barrels to NECC for reconditioning. The residues would eat holes in his clothes and turn them colors. This evidence has been confirmed by another truck driver who was employed by NECC from about 1954 to about 1970 and drove a truck for about eight of those years. This driver picked up drums from Hoechst Chemical in West Warwick and brought them to NECC for reconditioning. He stated that Hoechst was a big supplier of barrels.

NECC's recycling operations resulted in contamination at the Site. 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.

American Hoechst Corporation and Celanese Corporation merged in 1987 forming Hoechst Celanese Corporation. (Celanese response.) Hoechst Celanese Corporation later changed its name to CNA Holdings, Inc. (Celanese response.) CNA Holdings is wholly owned by Celanese Americas Corporation. (Celanese response.)

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

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 Hadley, Contract Attorney

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 response to EPA's request for information, Unocal Corporation states that American Mineral Spirit Company (AMSCO) operated at two facilities in Rhode Island – first at 370 Allens Avenue in Providence and then, after 1967, at 1 Pier Road in East Providence – during this time period. (Unocal response.)

The AMSCO facilities in Rhode Island were used for the storage, blending, packaging and distribution of petrochemicals. (Unocal response.) Generally, chemicals would arrive at the facilities in bulk and then were loaded onto a truck or packaged and shipped to customers in the amounts requested. (Unocal response.) These chemicals included aromatic hydrocarbons, aliphatic hydrocarbons, and to a lesser extent, acetone, methyl-ethyl-ketone, methyl-iso-ketone and isopropyl alcohol. (Unocal response.) Repackaging the chemicals included the use of 55-gallon drums. (Unocal response.) AMSCO sold drums to NECC and purchased refurbished drums from NECC. (Unocal response.) Unocal acknowledges that the drums sold to or taken by NECC may have contained minor amounts of residues of AMSCO's products. (Unocal response.)

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.

In 1965, through various corporate mergers, AMSCO became a division of Unocal. (Unocal

response.) AMSCO remained a division of Unocal until the majority of assets were sold to Ashland Chemical in 1992. (Unocal response.)

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

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

Contact: Anne Christien, Manager Regulatory Compliance

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 it purchased from one of the competitor's customers. One of these customers was Ciba Geigy. This arrangement is shown in the documents attached to this summary. According to these documents, Ciba Geigy contributed about 75,000 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.

M. Farrell

FORM 20 4 3 5 2

July 19	Geigy 2103	52575	
	Banner 100-	25-	July 9/69 #5834 55075
July 69	Geigy 2123-	53075	
	Banner 8-	75-	Aug 9/69 #5935 60575
	EAST 300-		
Aug 69	Geigy 827	20675	
	Banner		Sept 3/69
	FRUIT		6023# 20675
Sept 69	Geigy 2004 @ .25	501-	
	Banner		Oct 1/69 #6154 501-
	EASTERN S.M.		
Oct 69	Geigy 2302 @ .25	575.50	
	Banner 100	25.00	
	EASTERN S.M. 100	25.00	Nov 5/69 #6511 625.50
		625.50	
Nov	Geigy Chem 2078 @ .25	519.50	
	Banner 100	25-	
	Eastern Smelting		
		570-	
		544.50	Dec 8/69 #7132 544.50
			2034.25
Dec 69	Geigy Chem 2325	581.25	
	Banner		1/70
	Eastern Smelting 100	25-	Jan 6/70 6643 606.25
Jan 70	Geigy 3122	905.50	
	Banner		
	Eastern		
			Feb 9/70 #6851 905.50
Feb 70	Geigy 2549	637.25	
	Banner 100	25-	
	Eastern		
			Mar 6/70 #7036 662.25

17000 Oct 15/69 #6200

70

Mar/70	guig	3049	76225				1
	Eastern	100	25-				2
			78725	ago?	#7208	78725	3
Apr 70	guig	2611					4
	EAST						5
	STATION	75					6
	TANNA	2	673-	May 6/70	#7373	673	7
May/70	guig	2711	67725	6/11	7575	67775	8
	EAST						9
	TANNA						10
June 70	guig	3524					11
	TANNA	100	881-	July 8/70	#730	881	12
July 70	guig	3884					13
	EAST						14
	STATION	125					15
		4709	100225	Aug 11/70	7910	100225	16
Aug 70	guig	1295	31875	9/10/70	8005	31875	17
	EAST						18
	TANNA						19
Sept	guig	5702					20
	EAST						21
	TANNA						22
Oct 70	guig	3435					23
	TANNA	100					24
Nov 70	guig	3187					25
	EASTERN	100					26
		3287					27
Dec 70							28
							29
							30
							31
							32
							33
							34
							35

P A I D

JAN 29 1971

N.E. ... 88125 ... 88125 ...

Milton Isserlis

FORM 20-4 U.S.A.

1971

Date	Drums	Amount	Date	
			Paid	Check No
1 Jan 31	Leigy - 3715 @ .25			
2	Eastern Smelting - 96 @ .25			
3	3811 @ .25	95275	2/25/71	9173
4				
5 Feb 28	Leigy - 3649 @ .25	91225	3/17/71	9300
6				
7 Mar 31	Leigy - 5685 @ .25			
8	Eastern Smelting - 119 @ .25	1301-	4/14/71	9488
9				
10 Apr 31	Leigy - 4089 @ .25			
11	Panner - 50 @ .25	103475	6/2/71	9802
12				
13 May 31	Leigy - 4059 @ .25			
14	Panner - 50 @ .25	102725	6/21/71	9928
15				
16 June 31	Leigy - 4677 @ .25			
17	Panner - 100 @ .25			
18	Eastern Smelting - 100 @ .25	106925	7/26/71	10158
19				
20 July 30	Leigy - 3633 @ .25	90825	8/25/71	10337
21	Leigy - 127 @ .25	3175		
22				
23 Aug 31	Leigy - 1806 @ .25			
24	Panner - 50 @ .25			
25	Eastern Smelting - 100 @ .25	489-	Sept 17/71	10483
26				
27 Sept 30	Leigy - 3080 @ .25	770-	October 22	10724
28				
29 Oct 30	Leigy - 2869 @ .25			
30	Panner - 50 @ .25	2875	November 15	10839
31				
32 Nov 30	Leigy - 2474 @ .25			
33	Eastern Smelting - 100 @ .25	64350	December 13	10993
34		10789.00	updated	71
35 Dec 31	Leigy - 2270 @ .25		#11153	
cc	Panner - 100 @ .25	59250	Dec 27/71	5925

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

**Copy C
For Payer's Record**

870 10-00211-1

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
Esmond, R.I. 02917

PAID BY

Department of the Treasury—Internal Revenue Service

PAID TO

Earnings
Dr Journal
1971

869.7	*
252.7	5
912.2	5
131.0	
1034.7	5
1027.2	5
1069.2	5
940.0	
489.0	
770.0	
729.7	5
643.5	5
10739.2	*

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

Cranston Print Works Company
1381 Cranston Street
Cranston, RI 02920

Contact: George W. Shuster, Chief Executive Officer

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 response to EPA's request for information, Cranston Consumer Products states that Cranston Print Works operated a textile printing business at 1381 Cranston Street in Cranston, Rhode Island during this time period. (Cranston response.) This business was privately owned from 1824 until 1987, when under an employee stock ownership plan, the company was purchased by employees. (Cranston response.)

From 1952 to 1963, the Cranston facility bleached, printed and finished 100% cotton fabric. Chemicals used in the plating and engraving process included chromic acid, ferric chloride, caustic soda, xylene and methylene chloride. (Cranston response.) In 1963, a new plant was constructed and Cranston Print Works began to print fabric using rotary screen-printing technology. (Cranston response.) This process used dyes including fiber reactive dyes, acid dyes, disperse dyes and pigments. (Cranston response.) Former Cranston Print Works employees recall that in the 1960's Cranston Print Works sold empty 55-gallon metal drums to NECC. (Cranston response.)

At about the same time, Bercen Chemical operated a chemical manufacturing company on Valley Street in Providence. (Cranston response.) Bercen primarily manufactured speciality products such as surface-active agents, detergents, wetting agents, and emulsifiers for use in the textile industry. (Cranston response.) Bercen was purchased by Cranston Print Works in 1963 and became the Bercen Division of Cranston Print Works. (Cranston response.) A former Bercen employee recalls that Bercen would purchase 55-gallon metal drums from NECC and Efros Barrel would take the drums away. (Cranston response.) Efros Barrel was a customer of NECC.

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.

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

CONFIDENTIAL

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

Contact: Barry S. Shepard, President

Evidentiary Summary

CONFIDENTIAL

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

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

Contact: Pam Rollins, President

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 its assets to Metallix, Inc.

M. J. Farrell

FORM 20-4 U.S.A.

July 19	Geigy 2103	2103	52575	
	Banner 100-		25-	July 9/69 #5834 55075
July 69	Geigy 2123-	2123-	53075	
	Banner 8-		75-	Aug 4/69 #5935 60575
	EAST 300-			
Aug 69	Geigy 827	827	20675	Sept 3/19
	Banner			6023 # 20675
	FRANK			
Sept 69	Geigy 2004 @ .25	2004 @ .25	501-	
	Banner			Oct 1/69 #6154 501-
	EASTERN SM			
Oct 69	Geigy 2302 @ .25	2302 @ .25	575.50	
	Banner 100		25.00	
	EASTERN SMELTING 100		25.00	Nov 5/69 #6331 62550
			625.50	
Nov	Geigy Chem 2078	2078	519.50	
	Banner 100		25-	
	Eastern Smelting			
			544.50	Dec 8/69 #132 544.5
				2034.25
Dec 69	Geigy Chem 2325	2325	581.25	
	Banner			
	Eastern Smelting 100		25-	Jan 6/70 #6643 606.25
Jan 70	Geigy 3122	3122	905.50	
	Banner			
	Eastern			Feb 9/70 #6851 905.50
Feb 70	Geigy 2549	2549	637.25	
	Banner 100		25-	
	Eastern			Mar 6/70 #7036 662.25
			1127.5	

70

Mar/70	guy	3049	76225			1	
	Eastern	100	25-			2	
			78725	go 1	#7205	78725	3
Apr 70	guy	2612				4	
	EAST					5	
	SMELTING	75				6	
	罐	2	673-	May 8/70	+7373	673	7
May/70	guy	2711	67725	9/11	7575	67775	8
	EAST						9
	罐						10
June 70	guy	3524					11
	罐	100	881-	July 8/70	#7930	881	12
July 70	guy	3884					13
	EAST						14
	SMELTING	125	100225	Aug 11/70	7950	100225	15
		4509					16
Augst	guy	1295	31875	9/10/70	8065	31875	17
	EAST						18
	罐						19
Sept	guy	5102					20
	EAST						21
	罐						22
Oct 70	guy	3435					23
	罐	100					24
Nov 70	guy	3187					25
	EASTERN	100					26
		3287					27
Dec/70							28
							29
							30
							31
							32
							33
							34
							35

P A I D

JAN 29 1971

NEW YORK
CHESA
THRU

Milton Isserlis

FORM 20-4 U.S.A.

1971

Date	Drums	Amount	Date Paid	Check No
1 Jan 31	Geigy - 3715 @ .25			
2	Eastern Smelting - 96 @ .25			
3		3811 @ .25	952.75	2/25/71 9173
4				
5 Feb 28	Geigy - 3649 @ .25	912.25	3/17/71	9300
6				
7 Mar 31	Geigy - 5685 @ .25			
8	Eastern Smelting - 119 @ .25	1301-	4/14/71	9488
9				
10 Apr 30	Geigy - 4089 @ .25			
11	Panner - 50 @ .25	1034.75	6/2/71	9802
12				
13 May 31	Geigy - 4059 @ .25			
14	Panner - 50 @ .25	1027.25	6/21/71	9928
15				
16 June 30	Geigy - 4077 @ .25			
17	Panner - 100 @ .25			
18	Eastern Smelting - 100 @ .25	1069.25	7/26/71	10150
19				
20 July 30	Geigy - 3633 @ .25	908.25	8/25/71	10337
21	Geigy - 127 @ .25	31.75		
22				
23 Aug 31	Geigy - 1806 @ .25			
24	Panner - 50 @ .25			
25	Eastern Smelting - 100 @ .25	489-	Sept 17/71	10483
26				
27 Sept 30	Geigy - 3080 @ .25	770-	October 22	10724
28				
29 Oct 30	Geigy - 2869 @ .25			
30	Panner - 50 @ .25	287.75	November 15	10839
31				
32 Nov 30	Geigy - 2474 @ .25			
33	Eastern Smelting - 100 @ .25	643.50	December 13	10993
34		10789.00	Jan 15/71	
35 Dec 31	Geigy - 2270 @ .25		11/15/71	
36	Panner - 100 @ .25	592.75	Jan 8/72	5925

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

**Copy C
For Payer's Record**

GPO 16-40231-1

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
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. (See 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
RFD #3, Box 489A
Esmond, R.I. 02917

PAID TO

PAID BY

Department of the Treasury—Internal Revenue Service

Earnings
in Journals
1971

#6	9.7	*
95	2.7	5
91	2.2	5
1.3	1.3	5
1.0	34.7	5
1.0	27.2	5
1.0	69.2	5
94	0.0	5
48	9.0	5
77	0.0	5
72	9.7	5
64	3.5	5
107	39.2	*

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

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

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 response to EPA's information request, Organic Dyestuffs Corporation states that it operated at 65 - 84 Valley Street in East Providence during this time period. (Organic Dyestuffs response.) From 1965 until 2001, the company also had a facility on Benefit Street in Providence. (Organic Dyestuffs response.) The operations at Valley Street include offices, a laboratory and a production area for the mixing of dry powder dye for use in the textile industry. (Organic Dyestuffs response.) The Benefit Street facility mixed various textile chemical auxiliaries such as soaps, softeners, and after treatment for dyeing. (Organic Dyestuffs response.) Raw materials included dyes containing acids or bases, pigments, and chemicals, including but not limited to, sodium hydrosulfates, sodium hydroxide, ammonia, isopropyl alcohol, ethylene glycol and acetic acid. (Organic Dyestuffs response.) Organic Dyestuffs contributed empty 55-gallon drums to NECC. (Organic Dyestuffs response.)

EPA has requested and received information from NECC about its operations. In addition, EPA personnel have interviewed many former employees of NECC. Two of the former NECC employees interviewed as part of this investigation drove trucks for NECC as part of their duties. One such truck driver was employed by NECC from about 1956 to about 1969. He drove a truck for about six of those years. According to this individual, on a monthly basis, he would obtain 10 to 12 barrels with chemical residues in them from Organic Chemical on Rt 44 in Providence, Rhode Island.

NECC's recycling operations caused contamination at the Site. 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 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.

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

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

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 response to EPA's request for information, Original Bradford Soap Works, Inc. ("Bradford") states that it manufactured specialty bar soap, soap base and specialty chemicals at 200 Providence Street in West Warwick, Rhode Island. (Bradford response.) From 1952 to 1969, employees recall that raw materials were purchased in drums of various sizes. (Bradford response.) Following the use of such raw materials, the empty drums were sold to NECC. (Bradford response.)

EPA has requested and received information from NECC about its operations. In addition, EPA personnel have interviewed many former employees of NECC. Two of the former NECC employees interviewed as part of this investigation drove trucks for NECC as part of their duties. One such truck driver was employed by NECC from about 1956 to about 1969. He drove a truck for about six of those years. According to this individual, he picked up 50 to 75 barrels, with residues, every two weeks from Bradford in Warwick, Rhode Island and transported them to NECC for reconditioning. This evidence has been confirmed by another truck driver who was employed by NECC from about 1954 to about 1970 and drove a truck for about eight of those years. This driver recalled picking up drums from Bradford Soap and bringing them to NECC for reconditioning. In addition, a former employee of the chemical company that operated at the Site confirmed that he delivered barrels from the former chemical company to Bradford in West Warwick or Coventry, Rhode Island and then picked up barrels for delivery to NECC.

NECC's operations resulted in contamination at the Site. 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 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.

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

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

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

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 response to EPA's request for information, Sequa Corporation states that Warwick Chemical Company ("Warwick") operated a facility in Wood River Junction, Rhode Island during this time. (Sequa response.) Warwick manufactured chemicals for the textile, paint, varnish and other industries. (Sequa response.) The raw materials used at the facility are believed to have included methanol, formaldehyde and mineral spirits. (Sequa response.) Warwick eventually became a division of Sun Chemical Corporation which subsequently changed its name to Sequa Corporation. (Sequa response.)

EPA has requested and received information from NECC about its operations. In addition, EPA personnel have interviewed many former employees of NECC. Two of the former NECC employees interviewed as part of this investigation drove trucks for NECC as part of their duties. One such truck driver was employed by NECC from about 1956 to about 1969. He drove a truck for about six of those years. According to this individual, he picked up 150 barrels from Warwick once to twice a week and delivered them to NECC for reconditioning. The barrels contained up to 2 inches of liquid chemicals. This evidence has been confirmed by another truck driver who was employed by NECC from about 1954 to about 1970 and drove a truck for about eight of those years. This driver recalled picking up drums from Warwick and bringing them to NECC for reconditioning. He also recalls that he picked up drums from Wood River Junction in Hope Valley, Rhode Island.

NECC's operations resulted in contamination at the Site. 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 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.

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

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

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").

EPA has requested and received information from NECC about its operations. In addition, EPA personnel have interviewed many former employees of NECC. Two of the former NECC employees interviewed as part of this investigation drove trucks for NECC as part of their duties. One such truck driver was employed by NECC from about 1956 to about 1969. He drove a truck for about six of those years. According to this individual, he picked up 30 to 40 barrels from T.H. Baylis every two weeks, and delivered them to NECC for reconditioning. The barrels contained chemical liquids, including mineral spirits. According to the driver, this company also sold barrels to NECC that came from T.H. Baylis' customers. This evidence has been confirmed by another truck driver who was employed by NECC from about 1954 to about 1970 and drove a truck for about eight of those years. This driver recalled picking up drums from T.H. Baylis and bringing them to NECC for reconditioning. In addition, a former employee of the chemical company that operated at the Site also confirmed that barrels from T.H. Baylis in Warwick, Rhode Island were delivered to NECC for reconditioning.

NECC's operations resulted in contamination at the Site. 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 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.

In response to EPA's request for information, THBC, Inc. states that T.H. Baylis merged into Sanitas Security Services Corporation, a Delaware corporation, in 1985. (THBC, Inc. response.) Following this acquisition, Sanitas changed its name to T.H. Baylis Company and continued as a Delaware corporation ("Baylis - Delaware"). (THBC, Inc. response.) By April 1988, Baylis - Delaware was insolvent and sold substantially all of its remaining operating assets, including the name "T.H. Baylis Company". (THBC, Inc. response.) Baylis - Delaware then changed its corporate name to THBC, Inc. (THBC, Inc. response.)

CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

Teknor Apex Company
505 Central Ave.
Pawtucket, RI 02861

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

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 response to EPA's request for information, Teknor Apex Company states that it operated facilities in both Pawtucket, Rhode Island and Attleboro, Massachusetts during this time period. (Teknor Apex was formerly known as Thompson Apex Company.) (Teknor Apex response.) Operations at the Pawtucket facility include the manufacturing of custom compounds of plastic resins, including the addition of fillers and color additives. (Teknor Apex response.) Custom rubber blending and molding are conducted there as well. (Teknor Apex response.) In Attleboro, Teknor Apex produces custom compounds of plastic resins, including the addition of fillers and color additives, and manufactures chemical additives for plastic compounds. (Teknor Apex response.) Raw materials for these processes include zinc stearate, oils, lead compounds, benzene, alcohols, phthalic anhydride and acids. (Teknor Apex response.) At least one employee believes that drums were shipped to NECC for reconditioning. (Teknor Apex response.)

EPA has requested and received information from NECC about its operations. In addition, EPA personnel have interviewed many former employees of NECC. Two of the former NECC employees interviewed as part of this investigation drove trucks for NECC as part of their duties. One such truck driver was employed by NECC from about 1956 to about 1969. He drove a truck for about six of those years. According to this individual, on a monthly basis, he picked up 150 barrels with motor oil residue in them and transported them to NECC for reconditioning. This driver also recalls that on a monthly basis he would obtain 150 barrels, some with chemical residue in them, from Thompson Chemical in Attleboro, Massachusetts. This evidence has been confirmed by another truck driver who was employed by NECC from about 1954 to about 1970 and drove a truck for about eight of those years. He recalls picking up drums from Teknor Apex and bringing them to NECC for reconditioning. This driver also recalls picking up drums from Thompson Chemical in Attleboro, MA.

NECC's recycling operations caused contamination at the Site. 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 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.

Teknor Apex's business relationship with NECC is further documented in the attached handwritten note which demonstrates that NECC picked up closed head drums for reconditioning from Teknor Apex.

J. L. Potter,
Telmer apex
Pantucket

Thank you for listening to me ~~the~~ last
~~other day~~ week concerning our price
of conditioned closed head drums.

As you requested I shall try to
describe what we have been doing
in servicing your account ~~in~~ in Delumville
~~which I think has~~

for many years, and which I think has
been quite satisfactory in quality.

Generally we pick up drums from
both Delumville and Pantucket. Many of
the drums in Pantucket in the past
I have been used several times by your
company before we collect them, which
of course, is good management on your part.

We on the other hand have replaced
many of these rejects with our own drums
at a higher cost to us. ~~We have~~

~~tried to sell your reject drums~~ ~~which we~~
~~pay you a price of 75¢ each.~~ In the past
many of our drums which we exchanged for yours
... the lighter 20 gauge

12,
drum which ~~was~~ picked up from your
yard. #

I hope I have not confused you but
I think you ~~will first~~ have found that
our drum processing ~~has resulted~~
~~from the~~ which includes ~~sediment~~
& automatic leak detecting ~~and~~ has resulted
in ~~of~~ a satisfactory
container with few complaints.

~~We would like to put the~~
~~following new price~~

Concerning price adjustment we shall
charge \$ 2.60 each for servicing ~~of~~
closed head drums supplied by you.

For instance if we pick up 100 of your drums
and find ~~one~~ leaks or rejects we would
credit you \$ 2.60 each for the five rejects and
charge ~~for~~ for the balance of 95 drums.

~~We~~ would be happy to continue
serving your needs as carefully as possible
and we thank you for your consideration
of our company in the past.

UTJ