

March 19, 1999

Sharon Fennelly, Enforcement Coordinator
U.S. Environmental Protection Agency
Region 1 - New England
One Congress Street, Suite 1100 (HBR)
Boston, MA 02114

Re: Responses to Request for Information Pursuant to Section 104 of CERCLA and Section 3007 of RCRA, for the Centredale Manor Superfund Site

Dear Ms. Fennelly:

New England Container Co., Inc. (New England Container) responds to the 104(e) Request as follows:

1. General Information About Respondent:

NOTE: All questions in this section refer to the present time unless otherwise indicated.

- a. Provide the full legal name and mailing address of the Respondent.
- b. For each person answering these questions on behalf of Respondent, provide:
 - i. full name;
 - ii. title;
 - iii. business address; and
 - iv. business telephone number and FAX machine number.
- c. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including any legal notices, please so indicate here by providing that individual's name, address, telephone number, and FAX number.
- d. State every address in Rhode Island or Massachusetts at which the Respondent conducted business during the period being investigated.

- e. State the dates during which Respondent conducted business at each location listed in response to question 1.d.
- f. Describe the nature of Respondent's current business at each location listed in response to question 1.d., including but not limited to a brief description of the major products or services Respondent manufactures or provides.
- g. List the Standard Industrial Classification (SIC) code for the business at each location listed in response to question 1.d.
- h. Describe the nature of the Respondent's business at each location listed in response to question 1.d. during the period being investigated.
- i. For each location listed in response to question 1.d., identify all surveys, studies, or collections of data for which Respondent has submitted information to local, state, federal, or private entities about its waste disposal/recycling practices.
- j. Provide a copy of the information submitted by Respondent for such survey or study.
- k. Provide a copy of the resulting survey, study, or collection of data.
- l. Provide the names of all Superfund sites in Region I (New England) for which Respondent has received a request for information from EPA.

RESPONSE:

- a. **New England Container Co., Inc., George Washington Highway, Smithfield, Rhode Island 02917.**
- b. **Gerard C. DiSchino, President, New England Container Co., Inc., George Washington Highway, Smithfield, Rhode Island 02917 (401-231-2100; FX 401-231-7960); and Vincent A. Buonanno, President, Tempel Steel Company, 5215 Old Orchard Road, Skokie, IL 60077-1076 (1-800-621-7700; FX: 847-581-9024). Vincent J. Buonanno, former President of New England Container, worked at New England Container at the Site for several years prior to 1969 and worked at the Smithfield plant thereafter. Gerard DiSchino never worked at the Site.**

- c. **Deming E. Sherman, Esq., Edwards & Angell, LLP, 2800 BankBoston Plaza, Providence, Rhode Island 02903; (401-274-9200; FX: 401-276-6611).**
- d, e. **New England Container conducted business at 2074 Smith Street, North Providence, Rhode Island from approximately 1952 through 1969 and at George Washington Highway, Smithfield, Rhode Island from approximately 1969 through the present time.**
- f. **New England Container is a steel drum reconditioning company. The company reconditions "RCRA empty" drums obtained from various industries and sells them to its customers. It is not in the hazardous waste business and does not treat, store or recycle hazardous waste. It is not a chemical company and neither manufactured nor sold chemicals.**
- g. **New England Container's SIC code is: 7699**
- h. **New England Container is and always has been a steel drum reconditioning company at both the Site and at its present location.**
- i. **With respect to its present location, New England Container files with RIDEM and the EPA the following reports: annual VOC report, bi-annual hazardous waste reports, well monitoring reports, right-to-know reports, all of which are on file with these agencies. With respect to the Site, none.**
- j. **The available information is in RIDEM and EPA files.**
- k. **The available information is in RIDEM and EPA files.**
- l. **Western Sand & Gravel Superfund Site, Burrillville, Rhode Island; Landfill & Resource Recovery Site, North Smithfield, Rhode Island.**

Sources: Vincent J. Buonanno, Gerard C. DiSchino, Richard Costa, Vice President, New England Container Co., Inc.; reports to RIDEM, EPA.

2. Respondent's Legal and Financial Status

- a. **If the Respondent has ever done business under any other name (including but not limited to: Crown Chemical; Metro Atlantic; Crown Metro; Crown Metro Atlantic; Atlantic Chemical Company, Inc.; and Metro Chemical, Inc.):**
 - i. **list each such name; and**

- ii. list the dates during which such name was used by Respondent.
- b. If Respondent is, or was at any time during the period being investigated, a corporation, provide:
 - i. the date of incorporation;
 - ii. state of incorporation;
 - iii. agent for service of process;
 - iv. the names of current officers;
 - v. the names of current directors;
 - vi. the names of current shareholders owning more than 5% of Respondent's stock;
 - vii. the names and current addresses of all officers during the period being investigated;
 - viii. the names and current addresses of all directors during the period being investigated; and
 - ix. the names of all shareholders owning more than 5% of the Respondent's stock at any time during the period being investigated.
- c. If Respondent is, or was at any time during the period being investigated, a partnership, provide:
 - i. the names of all partners in the period being investigated; and
 - ii. the type of partnership (i.e. general, limited).
- d. If Respondent is, or was at any time during the period being investigated, a trust, provide:
 - i. the names of all trustees during the period being investigated;
 - ii. the names of all beneficiaries during the period being investigated; and
 - iii. a copy of the document which sets out the purpose of the trust and the duties and powers of the trustees (e.g., the declaration of trust or trust agreement).

- e. If Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity (including but not limited to Russell-Stanley Corporation of Bridgewater, New Jersey), then describe the nature of each such corporate relationship, including but not limited to:
 - i. a general statement of the nature of the relationship;
 - ii. the dates such relationship existed;
 - iii. the percentage of ownership of Respondent that is held by such other entity; and
 - iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities.
- f. Identify all of Respondent's predecessors-in-interest and provide a description of the relationship between Respondent and each of those predecessors-in-interest.
- g. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:
 - i. the titles and dates of the documents that embody the terms of such transactions (i.e., purchase agreements, merger and dissolution agreements, etc.);
 - ii. the identities of the seller, buyer, and any other parties to such transactions; and
 - iii. a brief statement describing the nature of the asset purchases or mergers.

RESPONSE:

- a. **New England Container never did business under any other name while located at the Site. New England has done business under the following names (following acquisitions of these businesses): Hartford Cooperage, approximately 1985-1994; City Barrel, 1980 to 1990; Goodyear Steel Container Co., Inc., approximately 1982 to 1992; Bay Colony Container Co., Inc., approximately 1988 to 1993.**
- b. **New England Container was incorporated on October 1, 1952 in Rhode Island. Its agent for service of process is Bernard V. Buonanno, Jr., 2800 BankBoston Plaza, Providence, RI 02903. Its**

current officers are: Gerard C. DiSchino, President, Eugene D'Onofrio, Treasurer, Daniel W. Miller, Secretary. All can be reached through New England Container. Its current directors are: Daniel W. Miller, Robert L. Singleton, Gerard C. DiSchino. All can be reached through New England Container. Its current shareholder is Russell-Stanley Holdings, Inc., 685 Route 202/206, Bridgewater, New Jersey 08807.

During the period being investigated, the following were officers of New England Container: Bernard V. Buonanno, 465 Rochambeau Avenue, Providence, RI 02906, President and Treasurer; Vincent J. Buonanno, President and Treasurer. Shareholders who owned more than 5% of the capital stock of New England Container during the period of investigation were: Metro-Atlantic, Inc., Bernard V. Buonanno and Vincent J. Buonanno.

- c. New England Container was never a partnership.
- d. New England Container was never a trust.
- e. In July of 1998, Russell-Stanley Holdings, Inc., acquired all of the capital stock of New England Container. The following are also subsidiaries of Russell-Stanley Holdings, Inc.: (1) Russell-Stanley Corp., 685 Route 202/206, Bridgewater, New Jersey 08807; (2) Hunter Drums Limited, 5420 North Service Road, Burlington, Ontario, Canada L7L6C7; and (3) Container Management Services, Inc., 1017 Holland Road, Simpsonville, South Carolina 29681.
- f. New England Container was incorporated in 1952. It did not have a predecessor in interest.
- g. Not applicable.

Sources: Vincent J. Buonanno, Gerard C. DiSchino; New England Container Co., Inc. corporate records.

3. Operations at Site by Respondent:

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

- a. Describe the nature of all operations by Respondent at the Site each year during the period being investigated.

- b. State the beginning and ending dates of Respondent's operations at the Site.
- c. State the specific dates during which wastes were brought to the Site for use, storage, placement, treatment, recycling, or disposal by Respondent.
- d. Provide copies of all local, state, and federal permits or licenses for the operation of Respondent's facility at the Site, including but not limited to permits for the transport, receipt, generation, handling, mixing, reclamation, recycling, storage, or disposal of wastes.
- e. List all Resource and Conservation Recovery Act (RCRA) identification numbers for Respondent's facility at the Site and facilities on the Site.
- f. Identify every product made at the Site, including but not limited to hexachlorophene.
- g. Identify every raw material used at the Site, including but not limited to tetrachlorobenzene, 2,4,5 trichlorophenol, sodium 2,4,5 trichlorophenate, and formaldehyde.
- h. Provide copies of all documents related to operations at the Respondent's facility at the Site, including but not limited to:
 - i. documents concerning the nature and volume of raw materials and/or product brought to the Site and by what entity or individuals, including but not limited to tetrachlorobenzene, 2,4,5 trichlorophenol, sodium 2,4,5 trichlorophenate, formaldehyde, and hexachlorophene;
 - ii. documents concerning the nature and volume of wastes being brought to the Site;
 - iii. documents concerning the dates wastes were brought to the Site;
 - iv. documents concerning where wastes were placed or disposed at the Site;
 - v. documents concerning the entities and individuals who brought wastes to the Site;
 - vi. documents concerning the names of entities and individuals whose waste was brought to the Site by others; and
 - vii. documents concerning the amounts charged for wastes brought to the Site.

- i. Describe each type of waste brought to the Respondent's facility at the Site or generated at the Site during operations by Respondent, including but not limited to:
 - i. the name of each type of waste;
 - ii. the chemical composition of each type of waste;
 - iii. the color of each type of waste;
 - iv. the odor of each type of waste;
 - v. the physical state of each type of waste (e.g., liquid, solid, sludge); and
 - vi. whether the waste was hazardous, toxic, flammable, reactive, corrosive, or was otherwise a hazardous substance.
- j. Provide all documents which indicate that the chemical compositions of the wastes brought to the Respondent's facility at the Site or generated at the Site during operations by Respondent were hazardous, toxic, flammable, reactive, corrosive, or were otherwise hazardous substances.
- k. State the approximate quantity of each type of waste brought to the Respondent's facility at the Site or generated at the Site during operations by Respondent, by year.
- l. Describe in general how and where each type of waste was handled or placed at the Site by Respondent (e.g., drums were emptied into a specific pit or the Woonasquatucket River and immediately returned to a waste carrier, drums were dumped directly into the Woonasquatucket River or adjacent land area without being emptied).
- m. If different types of waste were disposed/treated/stored or generated by Respondent in specific areas of the Site:
 - i. describe where specific types of wastes were disposed/treated/stored/ generated at the Site;
 - ii. indicate when those wastes were disposed/treated/stored/generated there; and
 - iii. provide a sketch indicating where each type of waste was disposed/treated/ stored/generated.
- n. Describe the types of containers in which each type of waste was brought to Respondent's facility at the Site, including but not limited to drums,

- cartons, pails, tanker trucks, packer trucks, roll-off trucks, and pickup trucks.
- o. Describe the number of containers brought to Respondent's facility at the Site.
 - p. Describe the approximate quantity of each type of waste which was brought to Respondent's facility at the Site in each type of container.
 - q. For each individual and entity which brought wastes to Respondent's facility at the Site:
 - i. identify (see Definitions) each such individual and entity who brought waste to the Site, including but not limited to each driver and his or her employer;
 - ii. describe the type and color of vehicle used by each individual and entity which brought waste to the Site including any distinctive markings or color;
 - iii. describe the types of wastes brought to the Site by each individual and entity by date;
 - iv. describe the quantity of wastes brought to the Site by each individual and entity by date; and
 - v. indicate where on the Site the waste brought by each such individual or entity was placed or disposed (Respondent may provide a sketch).
 - r. For each individual or entity who sent wastes to Respondent's facility at the Site through another individual or entity (i.e., those individuals and entities whose waste appeared at the Site but who did not bring the waste to the Site themselves):
 - i. identify (see Definitions) each such individual or entity;
 - ii. identify (see Definitions) the individual or entity that brought that waste to the Site;
 - iii. state the dates the waste was brought to the Site;
 - iv. describe the types of waste brought to the Site from each such individual or entity;
 - v. describe the quantity of waste brought to the Site from each such individual or entity; and

- vi. describe where each such individual's or entity's waste was disposed/placed at the Site.
- s. Provide copies of all documents which indicate:
 - i. the amounts charged by Respondent for storage/treatment/placement/ disposal of wastes at the Site;
 - ii. the total annual amount of such charges;
 - iii. to whom those charges were paid; and
 - iv. who paid such charges and in what amounts.
- t. Provide copies of all documents, including photographs, which describe or depict the Site, its operations, all wastes brought to Respondent's facility at the Site, the arrangements for bringing waste to the Site, who brought those wastes and/or where the wastes came from. Identify (see Definitions) who else may have such documents or photographs.
- u. For any manufacturing, recycling, recovery, or other industrial or chemical processes involved in Respondent's operations at the Site during the period being investigated:
 - i. Describe each process;
 - ii. Provide schematic diagrams or flow charts of each processes;
 - iii. State the brand name and chemical name of each product produced as a result of each process; and
 - iv. State the chemical name of any type dioxin produced as a result of any such process.
- v. For each legal action brought against Respondent regarding Site operations, permitting, or environmental matters, provide:
 - i. the caption name, jurisdiction, and docket number (e.g., U.S. v. Owner (D.N.H. 92-003));
 - ii. the date such action was initiated;
 - iii. the names of parties to the action; and
 - iv. the final disposition or current status of the action.

RESPONSE:

- a, b. New England Container operated a drum reconditioning business at the Site from 1952 to approximately 1969.
- c. New England Container did not accept wastes for treatment, storage, recycling or disposal. Its sole business was empty drum reconditioning.
- d. None.
- e. None.
- f. New England Container did not manufacture any products and, specifically, did not manufacture hexachlorophene. It only reconditioned empty drums.
- g. The only raw material it used was paint for application to interior and exterior of cleaned drums.
- h. None.
- i. As set forth above, New England Container did not accept waste at its facility. Its business was empty drum reconditioning. As a result of its drum reconditioning operations, it did generate some wastes as follows:

- oil and solvent washwater waste, which was disposed of in the sewer after the drums were cleaned; liquid state; contained caustic soda used for cleaning drums; color: dark brown.
- furnace ash, which was the residue from the reconditioned drums, was disposed of at a landfill; solid state; no specific chemical composition; color: black and gray.
- paint waste and solvent waste from mixing thinner with paints; disposed of at a landfill; sludge; contained MEK, mineral spirits; color: dark gray.
- shot waste disposed of at a landfill; solid state; contained metals; color: dark gray, black.

None of these wastes had strong odors.

Under RCRA standards, these might be classified as hazardous wastes. At the time, however, they were not considered hazardous wastes.

- j. None.
- k. No waste was brought to the Site; wastes generated either went into the sewer or were placed in a dumpster for hauling to a landfill by Truk-a-Way. We are unable to estimate the quantity of wastes generated.
- l. Not applicable. New England Container did not handle wastes and did not empty drums in the Woonasquatucket River or in pits.
- m. Not applicable.
- n. Not applicable. Empty steel drums were brought to the Site to be reconditioned and resold to New England Container's customers. New England Container did not treat, store, dispose or treat waste. Waste generated were handled as stated above.
- o. New England Container reconditioned approximately 50,000 steel drums per year at the Site.
- p. Not applicable.
- q. Not applicable. Most of the drums for reconditioning came from Metro-Atlantic, Inc. In the 1950s, many of the drums were wooden which were coopered on the premises.
- r. Not applicable.
- s. Not applicable.
- t. Copies of Sanborn maps are attached. A copy of a photograph is attached.
- u. Not applicable. New England Container reconditioned drums by cleaning them with a caustic soda solution, and/or furnacing and shotblasting with steel shot, and finally painting them inside and out.
- v. None.

Sources: Vincent J. Buonanno, Bernard V. Buonanno; Sanborn maps.

4. Site Characteristics:

NOTE: All questions in this section refer to period from the beginning date of the period being investigated until the present time unless otherwise indicated.

- a. Describe the physical layout and characteristics of the Site for each three year period during the period being investigated, including but not limited to:
 - i. surface structures (e.g., buildings, gates, fences, tanks, lagoons, settling ponds, mill trenches, tail races, pipes, etc.);
 - ii. subsurface structures (e.g., underground pipes, underground tanks, storm water systems, sanitary sewer systems, leach fields, septic systems, etc.); and
 - iii. ground water wells.
- b. Provide a map depicting each of these characteristics and its location on the Site.
- c. Describe how the Site characteristics referred to in the preceding question changed over time (e.g., when they were built, installed, altered, damaged, demolished, etc.) and the dates of each change.
- d. Provide copies of all documents concerning sampling, testing or other technical or analytical information concerning the surface water, groundwater, soils, sediments, and/or air at and adjacent to the Site conducted by private entities or by local, regional, state, or federal agencies.
- e. If the Respondent or its contractor is currently undertaking or planning to undertake investigations or excavations of the soil, groundwater, surface water, sediments, air, geology, or hydrogeology on or about the Site, describe the nature and scope of these investigations and the estimated completion date.
- f. Describe all leaks, spills, or releases (including but not limited to releases due to fires, pouring, pumping, emptying, or abandonment of drums or other containers holding any hazardous, toxic, flammable, reactive, or corrosive substances) at or from the Site of materials that were or may have been hazardous, toxic, flammable, reactive, or corrosive, or may have contained hazardous substances, including, but not limited to:
 - i. the date of each such occurrence;
 - ii. the specific location on the Site of each such occurrence; and
 - iii. the materials that were involved in each such occurrence in terms of the nature, composition, color, smell, and physical state (solid or liquid) of such material.

- g. Describe all *threats* of leaks, spills or releases (including but not limited to releases due to fires, pouring, pumping, emptying, or abandonment of drums or other containers holding any hazardous, toxic, flammable, reactive, or corrosive substances) at or from the Site of materials that are or may be hazardous, toxic, flammable, reactive, or corrosive, or that may contain hazardous substances, including but not limited to:
 - i. the specific location on the Site of such threat; and
 - ii. the material threatening to be leaked, spilled or released, in terms of the nature, composition, color, smell, and physical state (solid or liquid) of such material.
- h. Describe and provide the dates of all activities undertaken by Respondent and others to:
 - i. address all leaks, spills, or releases of materials at or from the Site; and
 - ii. to prevent a threatened leak, spill, or release at or from the Site.
- i. Describe all fires, explosions, or similar occurrences at the Site, including but not limited to:
 - i. the dates of such occurrences;
 - ii. the specific locations on the Site of such occurrences;
 - iii. the nature of such occurrences (including but not limited to the source of the occurrence, the type of material which was involved with the occurrence, how long the occurrence lasted, and the color of the flames in any fire which was part of the occurrence); and
 - iv. the measures taken to respond to them; and
 - v. the identity of any person(s) who witnesses the occurrences.
- j. Provide all documents related to government inspections of the Site during the period being investigated, including but not limited to inspection reports and communications between the Site operator or owner and the government entity concerning the operation of the Site.

RESPONSE:

- a. **New England Container occupied a small portion of the Site, which was primarily occupied by Metro-Atlantic, Inc., a chemical company. Metro-Atlantic operated several buildings on the Site. New England's**

small drum reconditioning facility can be seen on the Sanborn map attached (see building marked "barrel cleaning"). Its location did not change. We have no information about subsurface structures. There were no groundwater wells to our knowledge.

- b. **See Sanborn maps attached.**
- c. **To our knowledge, the buildings on the Site remained the same while New England Container was located there.**
- d. **None.**
- e. **Not applicable.**
- f. **None to our knowledge.**
- g. **None to our knowledge.**
- h. **None.**
- i. **None while New England Container was located at the Site. There was a major fire at the Site about 1972.**
- j. **None.**

Sources: Vincent J. Buonanno, Bernard V. Buonanno; Sanborn maps.

5. Lease(s):

NOTE: All questions in this section refer to the present time and the period being investigated unless otherwise indicated.

- a. For property at the Site leased to Respondent:
 - i. identify (see Definitions) all lease(s), sublease(s), and all other written or oral agreements for the use and/or occupancy of property within the Site boundaries.
 - ii. identify (see Definitions) each lessor or landlord of property within the Site;
 - iii. list the beginning and ending dates of each such arrangement;
 - iv. describe the specific real estate and/or buildings to which each such arrangement relates; and

- v. provide copies of all documents related to each lease, sublease, or similar property interest of property within the Site boundaries, including but not limited to all documents reflecting the purpose or terms of each lease, sublease, or similar property interest.
- b. For property at the Site leased to persons other than Respondent:
- i. identify (see Definitions) all lease(s), sublease(s), and all other written or oral agreements for the use and/or occupancy of property within the Site boundaries.
 - ii. identify (see Definitions) each lessor or landlord of property within the Site;
 - iii. list the beginning and ending dates of each such arrangement;
 - iv. describe the specific real estate and/or buildings to which each such arrangement relates; and
 - v. provide copies of all documents related to each lease, sublease, or similar property interest of property within the Site boundaries, including but not limited to all documents reflecting the purpose or terms of each lease, sublease, or similar property interest.

RESPONSE:

- a. **New England Container does not have any lease documents relating to the Site. New England Container used some buildings at the easterly portion of the site and some land outside the buildings for drum and truck storage, but we do not know of a lease specifically designating the premises used by New England Container or the terms of such arrangement. To the best of our knowledge, the owner of the Site was Centerdale Enterprises (the principals of which were Hugh Bonino and Joseph Buonanno) which owned the Site from 1943 to 1971.**
- b. **No information.**

Sources: Vincent J. Buonanno; real estate records in North Providence.

6. Contractors or Site Managers:

NOTE: All questions in this section refer to the period being investigated unless otherwise indicated.

- a. If not already provided in response to previous questions, identify (see Definitions) all contractors (including but not limited to construction,

demolition, and/or environmental contractors), site managers, or other entities or individuals who performed any work at the Site.

- b. List the dates of each such entity's or person's work at the Site.
- c. Provide a detailed description of all activities of each such entity or person at the Site including but not limited to:
 - i. the nature of the activity;
 - ii. the identities of (see Definitions) the persons managing the activity;
 - iii. the identities of (see Definitions) the persons performing that activity;
 - iv. the dates of that activity; and
 - v. the specific location on the Site of that activity.
- d. Describe the nature of the relationship between each such entity or person and the owner or lessee/tenant of the Site.
- e. Identify (see Definitions) all documents specifying or memorializing the relationship between each such entity or person and the owner and/or tenant of the Site.
- f. Identify (see Definitions) all documents produced by each such entity or person concerning the Site, including but not limited to all work reports, time cards, personnel information, site analyses, surveys, and studies.

RESPONSE:

- a, c. **To our knowledge, the only contractor that performed work at the Site was a local (unknown) contractor that occasionally sprayed oil and gravel on the ground to keep down the dust. We are unaware of any construction activity at the Site.**
- b. **Late 1960s.**
- d. **Unknown.**
- e. **Unknown.**
- f. **None.**

Sources: Vincent J. Buonanno, Bernard V. Buonanno.

7. Information About Others:

- a. If you have information concerning the operation of the Site (including but not limited to operations by Crown Chemical, Metro Atlantic, Crown Metro, Crown Metro Atlantic, Atlantic Chemical Company, Inc., Metro Chemical, Inc., Marshall Contractors, Inc., ADP Flour Daniel, Jet-Lines Services, Acme Services, C. Pezza & Sons, Inc., Peloquin & Sons, Inc., Peloquin Construction, and Goldberg, Zoino & Associates ("GZA"), Inc.) or the source, content or quantity of materials placed/disposed at the Site that is not included in the information you have already provided, provide all such information.
- b. If not already included in your response, if you have reason to believe that there may be persons, including persons currently or formerly employed by Respondent, who are able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
- c. If not already provided, identify all persons, including but not limited to Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

RESPONSE:

- a. **Metro-Atlantic, Inc., a Rhode Island corporation, operated a chemical company on the Site from the late 1930s to the early 1970s. Metro-Atlantic sold finishing chemicals to the textile industry. Metro-Atlantic (sometimes known as Atlantic Chemicals) received chemicals in drums and manufactured certain chemicals in its plant on the site. These chemicals were primarily textile finishing chemicals sold to textile mills in New England. One of its chief products was atcosin, which was a soap used for washing fabric, made from urea, formaldehyde and caustic soda. Urea and caustic soda were delivered in paper bags; alcohol and formaldehyde were delivered in tank trucks or drums.**

In later years, Metro-Atlantic also manufactured (a) reserve salt, a flaky material manufactured in the western side of the maintenance building, which was a metal stripper and was sold to a company named Enthone in New Haven, Connecticut, and to Evans Plating Company, also along the Woonasquatucket River; and (b) hexachlorophene, an insecticide, which was manufactured in a

building built about 1960 close to the Woonasquatucket River, and which was processed for Eli Lilly. Both of these products were hazardous. The manufacture of reserve salt and hexachlorophene did not use any liquids from drums that were reconditioned by New England Container.

Metro-Atlantic stored some drums on the Site, some of which were partially full of chemicals.

Upon information and belief, the assets of Metro-Atlantic were sold to United Shoe Machinery Company in the early 1970s.

Most of the drums that New England Container reconditioned came from Metro-Atlantic.

For a period of time, Bernard V. Buonanno was a plant manager at Metro-Atlantic.

- b. The son of Joseph Buonanno, Jay Buonanno, who lives in Providence, may have information about the operations of Metro-Atlantic.**
- c. None.**

Sources: Vincent J. Buonanno, Bernard V. Buonanno.

8. Compliance with This Request:

- a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:**
 - i. the names of all individuals consulted;**
 - ii. the current job title and job description of each individual consulted;**
 - iii. the job title and job description during the period being investigated of each individual consulted;**
 - iv. whether each individual consulted is a current or past employee of Respondent;**
 - v. the names of all divisions or offices of Respondent for which records were reviewed;**
 - vi. the nature of all documents reviewed; and**

- vii. the locations where those documents reviewed were kept prior to review; and
- viii. the location where those documents reviewed are currently kept.

RESPONSE:

- a. **These answers are based on the personal knowledge of Vincent J. Buonanno and his father, Bernard V. Buonanno, on limited records available at New England Container, and on corporate records of New England Container. Some public records in the Town Hall of North Providence, RIDEM and the Secretary of State also were consulted.**

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent New England Container, Co. Inc., and that the foregoing is complete, true, and correct.

NEW ENGLAND CONTAINER
CO., INC.

By 
Gerard C. DiSchino, President

Executed on March 19 , 1999

Vincent J. Buonanno

Executed on March , 1999

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Respondent New England Container, Co. Inc., and that the foregoing is complete, true, and correct.

**NEW ENGLAND CONTAINER
CO., INC.**

Executed on March , 1999

By
Gerard C. DiSchino, President


Vincent J. Buonanno

Executed on March 19 , 1999