

July 21, 1999

Sharon C. Fennelly, Enforcement Coordinator  
Site Evaluation and Response Section II  
Office of Site Remediation & Restoration  
U.S. Environmental Protection Agency  
One Congress Street Mail Code, HBR  
Boston, MA 02114-2023

Centredale Manor  
11.9  
9279

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

Dear Ms. Fennelly:

Bernard V. Buonanno, Sr. responds to the 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;
  - 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. Describe Respondent's involvement with business entities which operated at the Site during the period being investigated, (including but not limited to New England Container Corporation, Inc., Atlantic Chemical Company, Inc., Metro Dyestuff, Inc., Metro-Atlantic, Inc., and USM Corporation). Include the following information:

- i. state the position(s) held by the Respondent at any such business entity;
- ii. the dates during which Respondent held each position listed in response to 1.d.i.; and
- iii. the responsibilities held by Respondent for each position listed in response to 1.d.i.

**RESPONSE:**

- a. **Bernard V. Buonanno, Sr.  
465 Rochambeau Avenue  
Providence, Rhode Island 02906.**
- b. **I am answering the questions on my own behalf.**
- c. **Deming E. Sherman, Esq., Edwards & Angell, LLP, 2800 BankBoston Plaza, Providence, RI 02903; Tel.: 401-274-9200; Fax: 401-276-6611.**
- d. i. - iii. **About 1945, I began to work as general manager for Atlantic Chemical Company, Inc., which became Metro-Atlantic, Inc. in the 1950s, I believe (hereinafter "Metro-Atlantic"). I continued as general manager for Metro-Atlantic until approximately 1968, when I left the company. In that capacity, I was responsible for the operations of the company. Metro-Atlantic manufactured textile chemicals such as stiffeners and softeners for cloth. In the late 1960s, it also manufactured chemicals for the paper industry.**

**In approximately 1948, I became President and Director of New England Container Co., Inc. (hereinafter "New England Container"). As President, I was responsible for the overall operations of the company. I continued as President until 1978. I continued as a Director until 1998.**

**I was not involved with the other companies listed.**

2. **Lease(s):**

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

- a. 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.

- b. Identify (see Definitions) each lessor or landlord and each lessee or tenant of property within the Site.
- c. List the beginning and ending dates of each such arrangement.
- d. Describe the specific real estate and/or buildings to which each such arrangement relates.
- e. 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. **Centerdale Enterprises was the owner of the Site. Metro-Atlantic occupied several buildings comprising most of the Site, while New England Container occupied a building and adjoining area on the easterly portion of the Site until 1969. I do not recall any written leases between Atlantic-Metro or New England Container and Centerdale Enterprises, nor do I have copies of any written leases. If there were oral leases, I do not know the terms of them.**
- b. - c. **Centerdale Enterprises was the owner of the Site from 1943 to 1971. Metro-Atlantic occupied most of the Site in several buildings from the 1940s to the late 1960s, while New England Container occupied a building and adjoining area on the easterly portion of the Site from 1952 to 1969.**
- d. **New England Container occupied a building and adjoining area on the easterly portion of the Site. See 1956 Sanborn map attached to New England Container's 104(e) response dated March 19, 1999.**
- e. **None.**

3. **Operations:**

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

- a. Describe the nature of the operations at the Site during the period being investigated, including but not limited to the following information:

- i. identify every product made at the Site (including but not limited to hexachlorophene, if applicable);
  - ii. identify every raw material used at the Site (including but not limited to tetrachlorobenzene, sodium 2,4,5 trichlorophenolate, and formaldehyde, if applicable); and
  - iii. identify every waste generated at the Site (including but not limited to dioxin, if applicable).
  
- b. For each individual and entity which operated at the Site, state the beginning and ending dates of their operations at the Site.
  
- c. For each entity which operated at the Site, describe the corporate history (e.g., date of incorporation, name changes, mergers, location of all operations, date of dissolution).
  
- d. Provide copies (or, if copies are not available, identify how and when responsive documents were disposed of) of all documents which were created or kept of Site operations by Respondent, owners, lessees, tenants, contractors, site managers, or others, including but not limited to:
  - i. documents concerning raw materials used (including not limited to tetrachlorobenzene, 2,4,5 trichlorophenol, sodium 2,4,5 trichlorophenolate and formaldehyde, if applicable);
  - ii. documents concerning the products produced at the Site from raw materials (including but not limited to hexachlorophene, if applicable);
  - iii. documents concerning wastes generated by operations at the Site (including but not limited to dioxin, if applicable);
  - iv. documents concerning the nature (including those documents which indicate that the chemical compositions of the wastes brought to or generated at the Site were hazardous, toxic, flammable, reactive, corrosive, or were otherwise hazardous substances) and volume of wastes being brought to or generated at the Site;
  - v. documents concerning the dates wastes were brought to or generated at the Site;
  - vi. documents concerning where wastes were placed or disposed, or generated at the Site;
  - vii. documents concerning the entities and individuals who brought wastes to or generated wastes at the Site;
  - viii. concerning the names of entities and individuals whose waste was brought to or generated at the Site by others;
  - ix. documents concerning the amounts charged for wastes brought to the Site;

- x. documents concerning the products resulting from all operations at the Site;
  - xi. concerning the person(s) responsible for directing waste disposal or placement at the Site; and,
  - xii. the disposition of the documents if they are no longer in Respondent's possession.
- e. Describe each type of waste (see Definitions) brought to or generated at the Site during any operations at the Site, including but not limited to:
- i. the name of each type of waste;
  - ii. chemical composition of each type of waste;
  - iii. color of each type of waste;
  - iv. odor of each type of waste
  - v. the approximate quantity (by year) of each type of waste;
  - vi. the physical state of each type of waste (e.g. liquid, solid, sludge); and
  - vii. whether the waste was hazardous, toxic, flammable, reactive, corrosive, or was otherwise a hazardous substance.
- f. Describe in general how and where each type of waste (see Definitions) was handled or placed at the Site by any individual or entity (e.g., drums were emptied into a specific pit and immediately returned to a waste carrier, drums were placed directly into an area without being emptied, by-products from chemical manufacturing were placed in a pit, etc.).
- g. If different types of waste (see Definitions) were disposed/treated/stored or generated in specific areas:
- 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 provide a sketch indicating where each type of waste was disposed/treated/stored/generated.
- h. Describe the types of containers in which each type of waste was brought to the Site, including but not limited to drums, cartons, pails, tanker trucks, packer trucks, roll-off trucks, and pickup trucks.
- i. Describe the approximate quantity of each type of waste which was brought in each type of container.
- j. For each individual and entity which brought wastes (see Definitions) to 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).
- k. For each individual or entity who sent wastes (see Definitions) to 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.
- l. Provide copies of all documents, including photographs, which describe or depict the Site, its operations, all wastes brought to 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.
- m. Describe any manufacturing, recycling, recovery, or other industrial or chemical processes involved in Site operations (including but not limited to operations by Atlantic Chemical Company, Inc., Metro Dyestuff, Metro-Atlantic, Inc., and USM Corporation) during the period being investigated. Provide schematic diagrams or flow charts of such processes.
- n. Drums (both empty and containing materials such as hazardous substances) were discovered buried at the Site in the early 1980s during

excavation activities for a building project at the Site. Provide all information you have regarding the burial of those drums, including but not limited to the following:

- i. identify the time period during which drums were buried at the Site;
  - ii. identify the individual or entity responsible for the burial of the drums;
  - iii. identify the frequency of the drum burials;
  - iv. identify the total number of drums buried at the Site;
  - v. identify the contents of drums which were buried; and
  - vi. identify the burial location of the drums (using a map, if possible).
- o. When New England Container Corporation, Inc., operated at the Site, drums (both empty and containing materials) were frequently observed floating downstream in the Woonasquatucket River after having been released from the Site. Provide all information you have regarding these floating drums, including but not limited to the following:
- i. identify the individual or entity responsible for the release of the drums;
  - ii. identify the frequency of such releases;
  - iii. identify the contents of drums which were released; and
  - iv. identify the ultimate destination of the drums which were released.
- p. When New England Container Corporation, Inc., operated at the Site, persons were hired to retrieve drums (both empty and containing materials) which were observed floating downstream in the Woonasquatucket River after having been released from the Site. Please provide any information you have regarding the retrieval of these drums, including but not limited to the following:
- i. identify the individual or entity responsible for the retrieval of drums by such persons;
  - ii. identify the persons hired to accomplish the retrieval;
  - iii. identify any instructions given to the such persons;
  - iv. identify the methods used by such persons to accomplish retrieval of the drums; and
  - v. the amount paid (per drum) to such persons for a successfully accomplished retrieval.
- q. When New England Container Corporation, Inc., ceased operations at the Site, did New England Company, Inc., leave any item at any part of the Site (e.g., drums, equipment, papers, etc.)? If so, describe the item left

(including the number or quantity of the items left if more than one), and the location where the item was left.

**RESPONSE:**

With respect to New England Container, I have reviewed the response of Vincent J. Buonanno dated July 20, 1999, and I have no information beyond that set forth therein, and I adopt his response by reference.

With respect to Metro-Atlantic, I respond as follows:

- a.
  - i. Softeners, stiffeners, detergents and water repellents for cloth were manufactured by Atlantic-Metro at the Site. At some point, a building was constructed near the Woonasquatucket River for the manufacture of hexachlorophene, but it was a separate operation for which I had no responsibility.
  - ii. Sulfuric acid, caustic soda, diethanolmine, alcohols, solvents, urea, bicarbonate soda, reserve salt, tetrachlorobenzene, sodium 2, 4, 5 trichlorophenate and formaldehyde were products used by Atlantic-Metro. Principal suppliers were: Union Carbide Corporation, Hercules Chemical Company, Dow Chemical Company, DuPont Chemical Company, Enthone Company, American Cyanamid Corporation and Baylis Company.
  - iii. There was no waste dioxin. Whatever waste there was from the manufacturing operations (e.g. bad product) was disposed of in the sewer. Most of the raw materials received were mixed into special application chemicals for the textile industry (and paper industry) and sold to customers in drums or otherwise. There was not a lot of waste. No waste was disposed of either on or off the Site.
- b.-c. The predecessor to Metro-Atlantic began operations at the Site in the 1940s. Metro-Atlantic continued operations at the Site until approximately 1969.
- d.
  - i. No documents.
  - ii. No documents.
  - iii. No documents.
  - iv. No documents.

- v. **No documents.**
  - vi. **No documents.**
  - vii. **No documents.**
  - viii. **No documents.**
  - ix. **No documents.**
  - x. **No documents.**
  - xi. **No documents.**
  - xii. **N/A**
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- e. **Wastes were not brought to the Site. Metro-Atlantic was a chemical producing company. Whatever wastes there were from operations were disposed of in the sewer. No wastes were disposed of on the Site or off the Site.**
  - f. **Wastes were not brought to the Site. Metro-Atlantic was a chemical producing company. Whatever wastes there were from operations were disposed of in the sewer. No wastes were disposed of on the Site or off the Site. No drums with waste were emptied into pits or otherwise.**
  - g. **Wastes were not treated or stored on the Site; whatever wastes were disposed of were disposed of in the sewer.**
  - h. **Wastes were not brought to the Site.**
  - i. **Wastes were not brought to the Site.**
  - j. **Wastes were not brought to the Site.**
  - k. **Wastes were not brought to the Site.**
  - l. **None, except for the Sanborn maps attached to New England Container's response dated March 19, 1999.**
  - m. **See my response to 3(a)(i-iii). Generally, raw materials were mixed together in vats; some were piped into the vats, and some were poured into the vats.**

- n. Drums were not buried at the Site.**
- o. No drums were released off Site and into the Woonasquatucket River.**
- p. I never hired anyone to retrieve drums floating on the Woonasquatucket River.**
- q. New England Container did not leave any items at the Site.**

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. structures (e.g., 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. Describe all leaks, spills, or releases (including, but not limited to, releases due to fires which occurred repeatedly at the Site during the time in which New England Container Corporation, Inc., operated at the Site, pouring, pumping, emptying, or abandonment of drums or other containers holding any hazardous, toxic, flammable, hazardous, reactive or corrosive substances) 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. 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.
- e. 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.

**RESPONSE:**

- a. **The layout for Metro-Atlantic and New England Container was as shown on the 1956 Sanborn map attached to the response of New England Container.**
- b. **See response of New England Container dated March 19, 1999.**
- c. **A building was added near the River on the western edge of the Site in which hexachlorophene was manufactured.**
- d. **No spills or leaks occurred at the Site.**
- e. **N/A**

5. **Information About Others**

- a. If you have information concerning the operation (including but not limited to operations by Atlantic Chemical Company, Inc., Metro Dyestuff, Inc., Metro-Atlantic, Inc., New England Container Corporation, Inc., Marshall Contractors, Inc., Jet-Line Services, Acme Services, Peloquin and Sons, Inc., Peloquin Construction, C. Pezza and Sons, Inc., Goldberg, Zoino and Associates ("GZA"), Inc., Centredale Properties Corporation, Centredale Enterprises, Inc., Hugh Bonino, Joseph Buonanno, Sr., Helen Buonanno, Edward Ricci and Dorothy Ricci) of the Site 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 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. **I have no further information except that Metro-Atlantic was sold to United Shoe Machinery Corporation in the late 1960's.**
- b. **As it relates to New England Container, Bernard V. Buonanno, Sr., Joseph Buonanno (already known to the EPA); as it relates to Metro-Atlantic, Larry Bello of North Providence, a retired employee of Metro-Atlantic; and Gerry Zeoli of North Providence.**
- c. **N/A**