

March 3, 2000

Sharon Fennelly, Enforcement Coordinator
Site Evaluation and Response Section II
U.S. Environmental Protection Agency
Office of Site Remediation & Restoration
One Congress Street, Suite 1100, Mail Code HBR
Boston, MA 02114-2023

Centredale Manor
119
9280

**Re: Responses to Request for Information Pursuant to Section 104 of CERCLA
for the Centredale Manor Restoration Project Superfund Site, North
Providence, Rhode Island**

Dear Ms. Fennelly:

Bernard V. Buonanno responds to the 104(e) Request as follows:

1. Site-General

- a. Describe in detail the areas of the Site in which you worked between 1945 and 1972.
- b. Did you ever enter the building where hexachlorophene operations were being undertaken by Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) between 1945 and 1972? If your answer is anything other than an unequivocal "no":
 - i. how often did you enter the building and for what purpose?
 - ii. for each time you observed this area, describe what you observed there (including but not limited to waste disposal activities, if applicable)
- c. Did you ever observe the riverbank on the west side of the Site between 1945 and 1972? If your answer is anything other than an unequivocal "no":
 - i. how often did you observe the riverbank and for what purpose?
 - ii. for each time you observed this area, describe what you observed there (including but not limited to pipes and scum on the riverbank, if applicable).
- d. Did you ever observe the tail race on the east side of the Site between 1945 and 1972? If your answer is anything other than an unequivocal "no":
 - i. how often did you observe the tail race and for what purpose?

- ii. for each time you observed this area, describe what you observed there (including but not limited to the color of the water located in the tailrace).
- e. Did you ever observe the area of the Site south of where New England Container Company, Inc., operated between 1945 and 1972? If your answer is anything other than an unequivocal "no":
 - i. how often did you observe the Site south of where new England Container Company, Inc., operated between 1945 and 1972 and for what purpose?
 - ii. for each time you observed this area, describe what you observed there (including but not limited to waste disposal activities, if applicable).
- f. Did you ever observe the Woonasquatucket River located adjacent and/or down stream from the Site between 1945 and 1972? If your answer is anything other than an unequivocal "no":
 - i. how often did you observe the Woonasquatucket River and for what purpose?
 - ii. for each time you observed this area, describe what you observed there (including but not limited to the color of the River and the presence of floating drums, if applicable).
- g. Did you ever observe 55-gallon drums located at the Site between 1945 and 1972? If your answer is anything other than an unequivocal "no":
 - i. how often did you observe drums and for what purpose?
 - ii. for each time you observed drums, describe what you observed (including but not limited to the number of drums, where each drum was located, what each drum contained).
- h. Did you ever observe anyone disposing of material (including but not limited to 55-gallon drums and/or other material, if applicable) at the Site between 1945 and 1972? If your answer is anything other than an unequivocal "no":
 - i. how often did you observe the disposal and for what purpose?
 - ii. for each time you observed the disposal, describe what you observed (including but not limited to the amount of material being disposed, the method of disposal, the names of the persons and companies disposing of material, the chemical and brand names of the materials being disposed, whether or not the materials were hazardous).
- i. Did you assist New England Container Company, Inc., in preparing the response to question 1.f. in the March 19, 1999, response by New England Container Company, Inc., to EPA's Information Request? If so, define what you believe is meant by the term "RCRA empty" in the March 19, 1999, response to question 1.f. by New England Container Company, Inc., to EPA's Information Request.

RESPONSE:

- a) **I was familiar with the areas of the Site occupied by Metro-Atlantic and by NEC.**
- b) **I do not recall going into that building. That was not an operation under my supervision or control. A person named Tom Cleary (deceased) ran it.**
- c) **I am sure I did, but I do not recall any distinguishing characteristics.**
- d) **I am sure I did, but I do not recall any distinguishing characteristics.**
- e) **I observed that part of the Site. Metro-Atlantic stored some trucks and equipment there. I do not recall much else.**
- f) **No.**
- g) **Yes - there were drums all around the Metro-Atlantic plant - inside and outside. These drums contained the chemicals that Metro-Atlantic processed. Chemicals came in steel drums (as well as bags and tank cars and wooden drums early on).**
- h) **No.**
- i) **No.**

2. Operations-Atlantic Chemical Company, Inc./Metro-Atlantic, Inc.

- a. Identify the person who made decisions at Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) between 1945 and 1968 regarding waste disposal from facility operations at the Site. If someone other than you had the primary decision making ability regarding waste disposal, describe any role you had in decision making regarding waste disposal.
- b. Did you ever receive any written or verbal reports which included information regarding waste disposal by Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) at any time between 1945 and 1968? If so, describe the information regarding waste disposal contained in the reports (e.g., method of waste disposal, amount of waste being disposed).
- c. Identify the person who was responsible at Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) between 1945 and 1968 for compliance with local, state and federal environmental regulations (including but not limited to the signing of any forms required by local, state and federal government).

- d. Identify the person who was responsible at Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) between 1945 and 1968 for the hexachlorophene operations at the Site.
- e. In your July 21, 1999, response to question 3.a.i. you state that one raw material used at the Site was sodium 2,4,5 trichlorophenate. Was the hexachlorophene manufactured at the Site from highly purified 2,4,5-trichlorophenol?
- f. Did your duties as general manager at Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) between 1945 and 1968 exclude anything other than hexachlorophene operations at the Site (see your July 21, 1999, response to question 3.a.i)?
- g. Identify the person who was responsible for maintaining and/or securing the grounds occupied by Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) at the Site between 1945 and 1968. Describe the maintenance and/or security duties of that person and identify his/her supervisor.
- h. How many employees worked at the Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) facility located at the Site between 1945 and 1968? Identify (see Definitions) each and every employee who worked at the Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) facility located at the Site between 1945 and 1968, and provide a description of the job duties of each and every employee.
- i. Describe the current location of any documents related to the operations of the Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) between 1945 and 1968. If any documents related to the operations of the Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) between 1945 and 1968 have been disposed of, identify the location and method of disposal, and describe any role you had in their disposal.
- j. Describe the duties of Larry Bello and Gerry Zeoli at the Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) between 1945 and 1968.

RESPONSE:

- a) **Joseph Buonanno or Frank Mancini (both deceased).**
- b) **No.**
- c) **I don't know.**
- d) **Tom Cleary (deceased).**
- e) **I don't know.**

- f) **I don't recall.**
- g) **Frank Mancini (deceased).**
- h) **Forty to fifty. I do not recall the names, and have no records to refresh my recollection, except I do recall Larry Bello (previously identified to you).**
- i) **I don't know.**
- j) **Larry Bello was a production foreman; Gerry Zeoli was a production lead man.**

3. Operations-New England Container Company, Inc.

- a. Identify the person who made decisions at the New England Container Company, Inc., between 1948 and 1969 regarding waste disposal from facility operations at the Site. If someone other than you had the primary decision making ability regarding waste disposal, describe any role you had in decision making regarding disposal.
- b. Did you ever receive any written or verbal reports which included information regarding waste disposal by the New England Container Company, Inc., at any time between 1948 and 1972? If so, describe the information regarding waste disposal contained in the reports (e.g., method of waste disposal, amount of waste being disposed).
- c. Identify the person who was responsible at the New England Container Company, Inc., between 1948 and 1969 for compliance with local, state and federal environmental regulations (including but not limited to the signing of any forms required by local, state and federal government).
- d. Identify the person who designed the operations at the New England Container Company, Inc., between 1948 and 1969.
- e. Were any changes made to any part of the operations at the New England Container Company, Inc., between 1948 and 1969? If so, describe those changes and state your role in designing or approving the changes.
- f. Identify the person who was responsible for maintaining and/or securing the grounds occupied by New England Container Company, Inc., at the Site between 1948 and 1969. Describe the maintenance and/or security duties of that person and identify his/her supervisor.
- g. How many employees worked at the New England Container Company, Inc., facility located at the Site between 1948 and 1969? Identify (see definitions) each and every employee who worked at the New England Container Company, Inc.,

facility located at the Site between 1948 and 1969 and provide a description of the job duties of each and every employee.

- h. Describe the current location of any documents related to the operations of the New England Container Company, Inc., between 1948 and 1969. If any documents related to the operations of the New England Container Company, Inc., between 1948 and 1969 have been disposed of, identify the location and method of disposal, and describe any role you had in their disposal.
- i. For every drum obtained by the New England Container Company, Inc., between 1948 and 1969:
 - i. Identify (see Definitions) the source of the drum, including but not limited to DuPont, Monsanto, Merck and/or Hercules, if applicable);
 - ii. Describe the drum in detail:
 - (1) the condition of the drum (e.g. open, closed, sealed, damaged, new, used, etc.);
 - (2) the color of the drum;
 - (3) any distinctive stripes or other marking on the drum; and
 - (4) any labels or writing on the drum (including the content of those labels or writing).
 - iii. Describe in detail how the drum was transported to the Site:
 - (1) Identify (see Definitions) all persons (including but not limited to Respondent's employees) who may have taken or accompanied drums to the Site;
 - (2) Describe the vehicles used to transport drums, including but not limited to:
 - A. type of vehicles (e.g. tanker, flatbed, etc.);
 - B. the color(s);
 - C. the owner (including but not limited to Respondent, if applicable);
 - D. distinctive markings (e.g. company names, logo); and
 - E. number(s) of each type of vehicle.
 - iv. State whether the drum was purchased by New England Container Company, Inc.
 - v. State whether and how much New England Container Company, Inc. was paid to recycle the drum.
 - vi. Describe in detail any material contained in the drum when it arrived at the Site (e.g., amount, chemical name, brand name, color, weight, odor).
- j. For each year New England Container Company, Inc., operated, state the number of drums it attempted to recycle and the number of drums it actually recycled.
- k. Describe the duties of Christopher Del Sesto, Eustace T. Pliakas and Francis Maguire at the New England Container Company, Inc., between 1948 and 1969.

RESPONSE:

For the operations of NEC, please refer to the responses of NEC and Vincent Buonanno which I agree with and have no further information.

4. Sale of Metro-Atlantic

- a. In what year was Metro-Atlantic sold?
- b. Identify (see Definitions) the purchaser of Metro-Atlantic.
- c. Was the sale of Metro-Atlantic reduced to paper? If so, provide a copy of the contract related to the sale of Metro-Atlantic, Inc. If you do not have a copy, state where a copy of the contract is currently located.
- d. After the sale of Metro-Atlantic, did operations of Metro-Atlantic at the Site remain the same (e.g., same name, same products, same employees, same stationary)? Describe any differences in operations.
- e. Did Metro-Atlantic have a parent corporation after the sale? If so, identify the parent corporation and all of its subsidiaries.
- f. Did you have any interaction with Metro-Atlantic after the sale? If so, describe the nature of that interaction in detail.

RESPONSE:

- a) **Approximately 1969.**
- b) **USM Corp.**
- c) **I assume it was. I have no documents.**
- d) **I think so for a short time.**
- e) **I don't know.**
- f) **No.**

5. Insurance

- a. Provide copies of all liability insurance policies held by Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) each year from 1945 to 1968. In lieu of providing copies, you may provide the following information:
 - i. the name and address of each insurer and of the insured;
 - ii. the amount of coverage under each policy;

- iii. the commencement and expiration dates for each policy;
 - iv. whether or not the policy contains a "pollution exclusion" clause; and
 - v. whether or not the policy covers sudden, non-sudden or both types of accidents.
- b. Provide copies of all liability insurance policies held by New England Container Company, Inc., each year from 1948 to 1969. In lieu of providing copies, you may provide the following information:
- i. the name and address of each insurer and of the insured;
 - ii. the amount of coverage under each policy;
 - iii. the commencement and expiration dates for each policy;
 - iv. whether or not the policy contains a "pollution exclusion" clause; and
 - v. whether or not the policy covers sudden, non-sudden or both types of accidents.

RESPONSE:

I have no information about insurance for Metro-Atlantic or NEC.

6. **Information About Others**

- a. 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.
- b. Provide the current address and telephone number of Larry Bello and Gerry Zeoli (see your July 21, 1999, response to question 5.b of EPA's Information Request).
- c. Identify any person (including but not limited to yourself) who was asked to provide information to Centerdale Manor Associates Limited Partnership and/or Brook Village Associates Limited Partnership regarding operations at the Site by Atlantic Chemical Company, Inc. (later known as Metro-Atlantic, Inc.) and/or New England Container Company, Inc. State when information was provided and summarize the information provided.

RESPONSE:

- a) **I know of no other persons with information.**
- b) **See NEC response of March 3, 2000.**
- c) **None to my knowledge.**

7. 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:

I reviewed NEC responses and information supplied by Vincent J. Buonanno. I reviewed no other documents.

DECLARATION

I declare under penalty of perjury that the foregoing is complete, true, and correct to the best of my knowledge.


Bernard V. Buonanno, Sr.

Executed on March 3, 2000

103
(314)

**CENTREDALE
NORTH PROVIDENCE**

POPULATION: 7000

WATER FACILITIES:
Water Supply from Providence Water
works & Mills, Water Mains & 8" & 10" Post Hydrants.
FIRE DEPT.:
Volunteer, 4 Fire Stations, 4 Hose
Teams, 200 375 Gallon & 1 Truck (and
drawn) 1 Local Chemical on wheels.

WATERMAN

**CENTREDALE WORSTED MILLS
Wool Worsted Yarns**

SMITH

PROVIDENCE RIVER
CONCRETE BRIDGE
RIVER
TOWN OF CENTREDALE
PROVIDENCE RIVER

Head Race

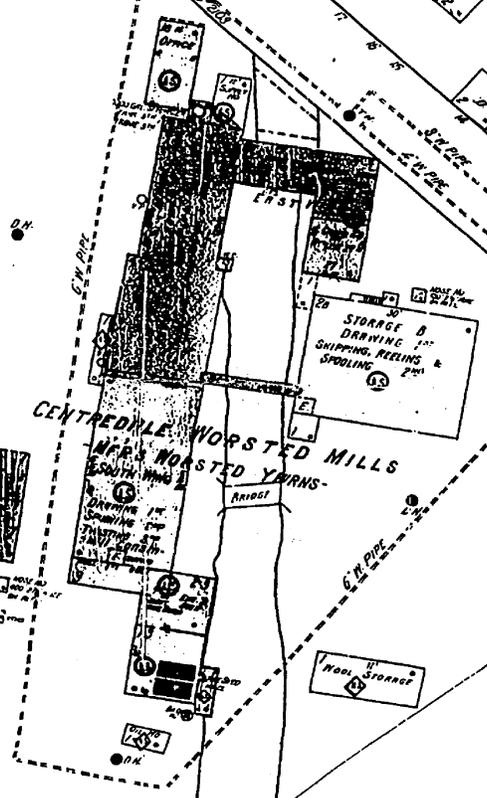
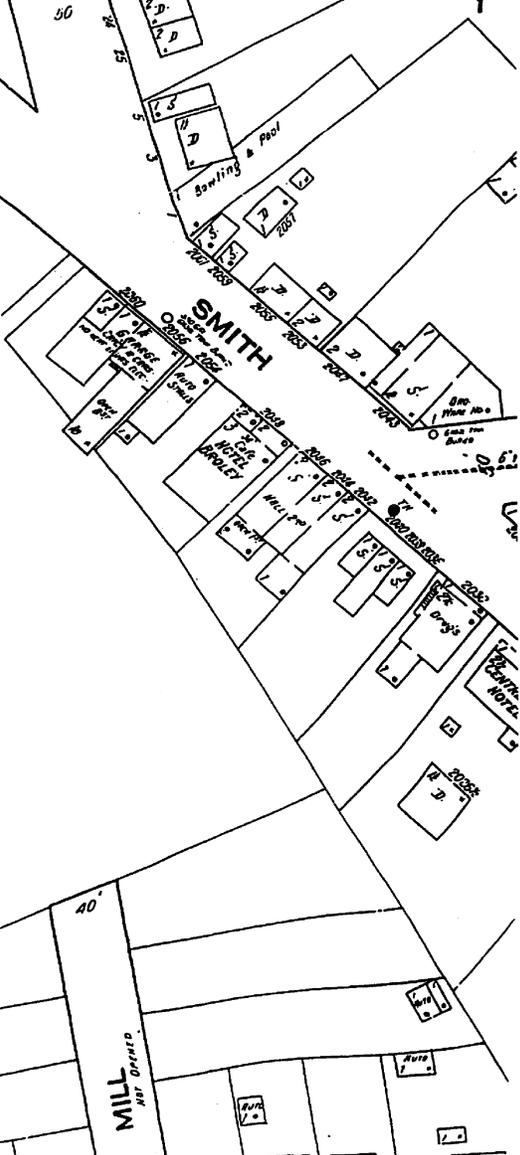
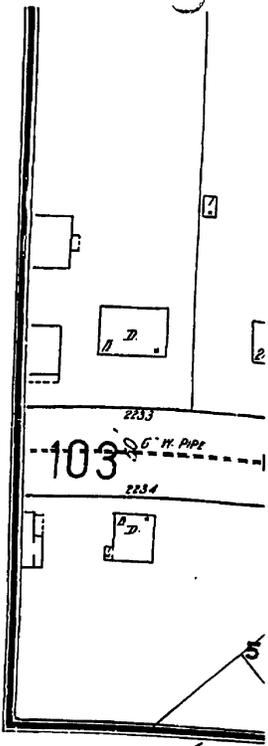
Race

NIGHT WATER AND ELECTRIC CLOCK NO. 37 315
POWER, WATER, ELECTRIC & STEAM, HOT AIR, STEAM
LIGHTS, ELEVATOR, 1 1/2" FIRE PIPES THROUGH
OUTSIDE WALLS TO SHOWY & ROOF REELS, 1000' IN
HOSE-DRAWING, AUTOMATIC SPRINKLER SYSTEM,
HOT & COLD WATER, HOT AIR, HOT WATER, HOT
AIR, HOT WATER, HOT AIR, HOT WATER, HOT AIR,
TO: BANK ALSO DRECT TO CITY HALL

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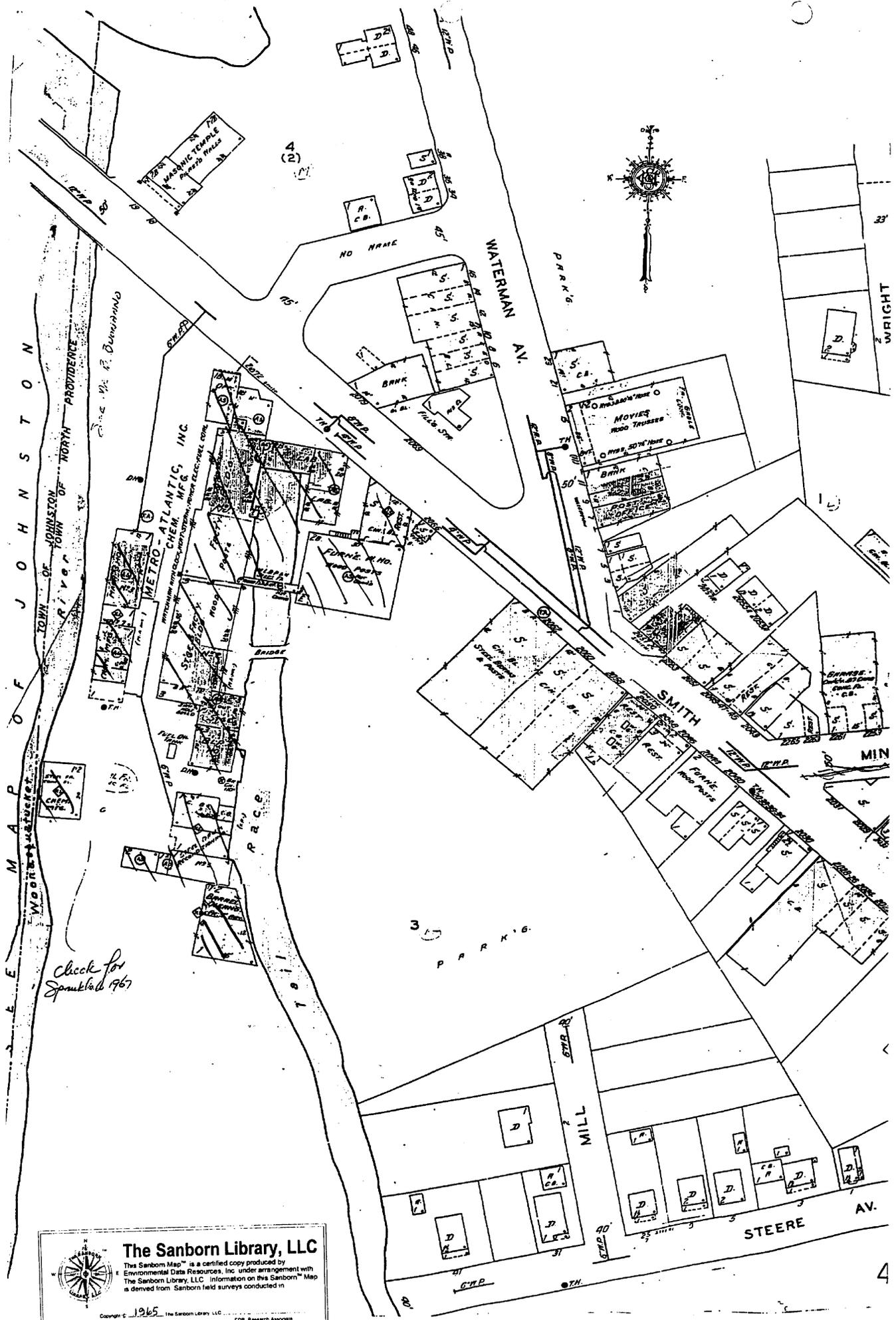


M A P O F J O H N S T O N

TOWN OF JOHNSTON OF NORTH PROVIDENCE

Watermaster

Check for Sprinklers 1967



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