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**CERTIFIED MAIL**  
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7001 2240 0000 6593 3161  
DATE 6659 0000 0477 7002

Postage \$ \_\_\_\_\_

Certified Fee \_\_\_\_\_

Return Receipt Fee  
(Endorsement Required) \_\_\_\_\_

0089-0001

Postmark  
Here

William F. O'Connor  
Vice President of Risk Management  
Clean Harbors, Inc.  
P.O. Box 859048  
1501 Washington Street,  
Braintree, MA 02185

PS

See Reverse for Instructions

### **Certified Mail Provides:**

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

### **Important Reminders:**

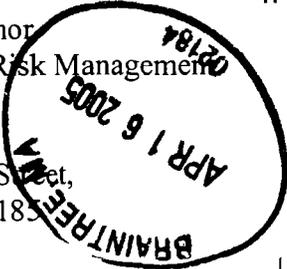
- Certified Mail may **ONLY** be combined with First-Class Mail or
- Certified Mail is not available for any class of international mail
- **NO INSURANCE COVERAGE IS PROVIDED** with Certified valuables, please consider Insured or Registered Mail.
- For an additional fee, a Return Receipt may be requested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

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

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

William F. O'Connor  
Vice President of Risk Management  
Clean Harbors, Inc.  
P.O. Box 859048  
1501 Washington Street,  
Braintree, MA 02185



7001 1140 0000 6593 3161

**COMPLETE THIS SECTION ON DELIVERY**

A. Received by (Please Print Clearly) B. Date of Delivery

*Lee Ruth*

C. Signature  Agent  
 Addressee

D. Is delivery address different from item 1?  Yes  
 No

Address below:

0089-0002

Express Mail  
Return Receipt for Merchandise

Insured Mail  C.O.D.

Restricted Delivery? (Extra Fee)  Yes

UNITED STATES POSTAL SERVICE



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

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

U.S. Environmental Protection Agency  
Martha Bosworth, Enforcement Coordinator  
Office of Site Remediation and Restoration (HBS)  
One Congress Street, Suite 1100  
Boston, MA 02114

ATTN: Wells G&H Case Team





Wells G & H  
11.9  
282336

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

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

April 14, 2005

William F. O'Connor  
Vice President of Risk Management  
Clean Harbors, Inc.  
P.O. Box 859048  
1501 Washington Street,  
Braintree, MA 02185

Re: Request for Information Pursuant to Section 104 of CERCLA regarding Murphy's Waste Oil Service, Inc. in relation to the Wells G & H Superfund Site

Dear Mr. O'Connor:

The United States Environmental Protection Agency (EPA) is investigating the release or threatened release of hazardous substances, pollutants or contaminants, or hazardous wastes at the Wells G & H Superfund Site in Woburn, Massachusetts (the "Site"). This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to the Site and/or generated, treated, stored, or disposed of at the Site. This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Site. This request focuses specifically on the portion of the Site known as the Southwest Properties (see Enclosure D). Murphy's Waste Oil Service, Inc.'s facility is located within the Southwest Properties.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in the Enclosure to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request **within thirty (30) days** of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to ~~thirty two thousand five hundred dollars (\$22,500)~~ for each day of non-compliance.

SYMBOL	Please note that responses which are incomplete, ambiguous, or evasive will be treated as				
SURNAME	HBS	Marsella			
DATE	4/14/05	4/14/05			



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

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**CERTIFIED MAIL: RETURN RECEIPT REQUESTED**

April 14, 2005

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Please note that responses which are incomplete, ambiguous, or evasive will be treated as

complete non-compliance with this Information Request. Also, be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq. Your response to this Information Request should be mailed to:

U.S. Environmental Protection Agency  
Martha Bosworth, Enforcement Coordinator  
Office of Site Remediation and Restoration (HBS)  
One Congress Street, Suite 1100  
Boston, MA 02114

ATTN: Wells G&H Case Team

If you have questions concerning the this Information Request, you may contact Martha Bosworth, Enforcement Coordinator at 617-918-1407. Technical questions concerning the Site should be referred to Joseph LeMay, the Remedial Project Manager at 617-918-1323. If you have legal questions, or if your attorney wishes to communicate with EPA on your behalf, please contact Susan Scott, Enforcement Counsel, U. S. Environmental Protection Agency, Office of Environmental Stewardship, 1 Congress St. (SES), Boston, MA 02114-2023, or at 617-918-1778.

Due to the seriousness of the problem at the Site and the legal ramifications of your failure to respond properly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above. Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in cursive script that reads "Bruce A. Marshall".

Bruce A. Marshall, Chief  
Search and Cost Recovery Section, Technical & Support Branch  
Office of Site Remediation and Restoration

Enclosures  
Information Request Questions  
Information Request Instructions  
Information Request Definitions  
Site Description  
Site Map  
Declaration

**WELLS G & H**  
**ENCLOSURE A - INFORMATION REQUEST QUESTIONS**

\*\*\*\*\*  
\* \* \* \* \*  
\* Period Being Investigated: 1950 to Present \*  
\* \* \* \* \*  
\*\*\*\*\*

In addition to the questions which follow in this enclosure (Enclosure A), this letter includes detailed Instructions for responding to this request (Enclosure B), Definitions of words such as "Respondent," "identify," and "waste" used in the questions (Enclosure C), a Site Description (Enclosure D), Map (Enclosure E) and a Declaration (Enclosure F). These enclosures appear at the end of the questions; please refer to them in answering all questions. Of particular importance:

- Answer each question with respect to the period being investigated (noted above) unless the question indicates otherwise.
- Answer all questions completely in accordance with the definitions and instructions.
- For each question, identify all persons and documents consulted in the preparation of the answer and provide copies of all those documents.
- All information provided for which you are making a claim of business confidentiality should be contained on separate sheets and clearly marked as CONFIDENTIAL.
- All personal information, the release of which would constitute an unwarranted invasion of privacy, should be contained on separate sheets and clearly marked as PRIVACY MATERIAL.
- This request imposes a continuing obligation upon you to submit responsive information discovered after your original response is submitted to EPA.
- Complete the enclosed declaration (Enclosure F).

## INFORMATION REQUEST QUESTIONS

### 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.
- 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, and telephone number.
- d. Provide the names of the current officers, directors, and the current shareholders owning more than 5% of the stock of Clean Harbors, Inc. and/or Clean Harbors Environmental Services, Inc. Provide the names of the current officers, directors, and shareholders owning more than 5% of Murphy's Waste Oil Service, Inc.'s stock. Describe how these directors and officers were hired, elected, or assigned.
- e. Provide the names of all officers, directors, and shareholders that owned more than 5% of the stock of Clean Harbors, Inc. and/or Clean Harbors Environmental Services, Inc. during the time period from 1986 through the present time. Provide the names of all officers, directors, and shareholders owning more than 5% of Murphy's Waste Oil Service, Inc.'s stock during that same time period.

### 2. Respondent's Operations (Pre-1987)

**NOTE: All questions in this section refer to the period 1977 through 1987.**

- a. Joan Murphy of Murphy's Waste Oil Service, Inc. identified Clean Harbors, Inc. [a/k/a Clean Harbors Environmental Services, Inc. (collectively, "Clean Harbors")] as a "large quantity generator[s]" of waste oil at the facility in her response to a CERCLA Section 104(e) Information Request dated February 9, 1988. Provide any information you may have regarding the waste oil sent to the facility by Clean Harbors including:

- i. the time period during which Clean Harbors transported waste oil to the facility;
    - ii. the types of waste oil transported to the facility;
    - iii. the annual volume of each type of waste oil sent to the facility; and
    - iv. provide any documentation regarding the transport of this waste oil to the facility, including but not limited to all manifests, invoices, bills of lading, and contracts.
  - b. Provide any documentation or information you may have regarding waste oil sent to the facility by other generators or transporters, including but not limited to:
    - i. all manifests, invoices, bills of lading, and contracts;
    - ii. the types of waste oil sent by each generator or transporter; and
    - iii. the annual volume of each type of waste oil the facility accepted from each generator or transporter.
  - c. Describe the nature of Clean Harbors involvement with operations at the facility, including but not limited to any planning, site development, remediation, and business development activities.
  - d. Describe Clean Harbors involvement, if any, in the expansion of the oil tank farm at the facility in 1986. Provide any documentation or information you may have regarding this expansion.
3. Respondent's Operations (Post-1987)

**NOTE: All questions in this section refer to the period 1987 through 1990.**

- a. Identify all activities conducted by Clean Harbors at the Murphy's Waste Oil Service, Inc. facility including:
  - i. the dates each activity commenced and concluded;
  - ii. the types of work performed and the area(s) of the facility in which the work was performed, including the removal of any above-ground tanks, soil excavation, and oil and groundwater sampling;
  - iii. the contractors hired to perform the work;
  - iv. the foreman or manager responsible for the oversight of the work;
  - v. the results of any soil and/or groundwater sampling;
  - vi. the location where removed materials were taken for disposal and the transporter(s) who hauled the materials; and
  - vii. provide copies of any documents related to these activities.

- b. Describe Clean Harbors' involvement, if any, with the siting of the new oil storage facility in the central portion of the property, including:
  - i. the dates that all facility siting activities commenced and concluded;
  - ii. the types of work performed and the area(s) of the facility in which the work was performed, including any tank removals, soil excavation, and soil and groundwater sampling;
  - iii. the contractors hired to perform the work;
  - iv. the foreman or manager responsible for the oversight of the new facility siting work;
  - v. the results of any soil and/or groundwater sampling;
  - vi. the individuals or companies that transported the removed materials and the disposal location(s) for the removed materials; and
  - vii. provide copies of any documents related to these siting activities.
  
- c. Describe the nature of Clean Harbors involvement, if any, in the August/September 1988 petition for a height variance for the fence at the facility, including:
  - i. the reason for the fence installation;
  - ii. any other actions Clean Harbors took to ensure the security of the facility; and
  - iii. provide copies of any documents related to the fence installation or any other security measures implemented by Clean Harbors.

4. Respondent's Operations (1987-present)

**Note: All questions in this section refer to Clean Harbors' operation of the facility unless otherwise indicated. Questions in this section refer to the period 1987 to present.**

- a. Describe how Clean Harbors publicly announced its purchase of Murphy's Waste Oil Service, Inc.'s stock and its operation at the facility, including:
  - i. how Clean Harbors represented itself and the facility in comparison to the old Murphy's Waste Oil Service, Inc.'s facility and management;
  - ii. how Clean Harbors marketed the facility; and
  - iii. provide copies of any documents concerning the sale of the facility and Clean Harbors marketing of the facility's services.
  
- b. Please describe any arrangements between the City of Woburn (and its agencies) and Murphy's Waste Oil Service, Inc. for the provision of a waste motor oil tank at the facility, including:

- i. any liabilities concerning the improper disposal of waste oil assumed by the City of Woburn under this arrangement;
  - ii. any benefits Murphy's Waste Oil Service, Inc. derived from this use of the facility;
  - iii. any compensation Murphy's Waste Oil Service, Inc. received in return for providing this service; and
  - iv. provide copies of any documents regarding the creation and management of this arrangement.
- c. Provide copies of all lease agreements and related documents between Clean Harbors (a/k/a Murphy's Waste Oil Service, Inc.) and the Old Oil Realty Trust concerning the use of 250, 252, and/or 252R Salem Street.
- d. Describe Clean Harbors' (a/k/a Murphy's Waste Oil Service, Inc.) payment arrangement for the lease of the property at 252 and/or 252R Salem Street, Woburn, MA, including:
  - i. the method of payment (e.g., cash, check, money order);
  - ii. to whom those payments were made; and
  - iii. the identity of the Murphy's Waste Oil Service, Inc. employee/agent in charge of accounting for and making such payments.
- e. Describe any claims Clean Harbors (a/k/a Murphy's Waste Oil Service, Inc.) has made against Old Oil Realty Trust pursuant to Paragraph 14 of the February 1989 Lease Agreement between said parties. Please provide copies of any documents regarding or supporting these claims.
- f. Describe the nature of Clean Harbors current business at the Murphy's Waste Oil Service, Inc. facility, including but not limited to, a brief description of the major services Clean Harbors provides. If the nature or size of these operations changed over time, describe those changes and the dates they occurred.
- g. Describe Clean Harbors' procedure for the acceptance of waste oil at the facility, including:
  - i. what is done to the waste oil after it is received at the facility; and
  - ii. where the waste oil is disposed or otherwise placed at the facility.
- h. If particular types of waste oils are placed or disposed in separate or specific areas of the facility indicate:
  - i. the types of waste oils so placed or disposed;

- ii. where on the facility those waste oils are placed or disposed; and
  - iii. how those waste oils are placed or disposed (e.g., facility operator crushed full pails with bulldozer or Respondent emptied full 55 gallon metal barrels into a pit and facility operator then crushed and buried the barrels).
- i. If particular customers' waste oils are placed or disposed in separate or specific areas of the facility, indicate:
  - i. the identity of each such customer;
  - ii. the nature and chemical composition of each such customer's type of waste oil so placed or disposed;
  - iii. the quantity of each such customer's waste oil so placed or disposed; and
  - iv. where on the facility each such customer's waste oil is so placed or disposed.
- j. If drums are placed or disposed at the facility, indicate:
  - i. where they are placed or disposed;
  - ii. their condition when placed or disposed (e.g., if they are left open or closed, intact or punctured, whole or crushed); and
  - iii. if there was any consolidation, where the consolidation took place and what considerations were given to the consolidation practice.
- k. If liquids are placed or disposed at the facility, indicate whether and how liquids are:
  - i. mixed at the facility;
  - ii. placed or disposed in a separate area(s); and
  - iii. placed or disposed in their containers or removed from their containers.
- l. Describe the methods used to clean up spills of liquid or solid materials, including but not limited to:
  - i. the types of materials spilled in Respondent's operations;
  - ii. the materials used to clean up those spills;
  - iii. the methods used to clean up those spills;
  - iv. the method used to dispose of the materials used to clean up spills; and
  - v. any Clean Harbors' affiliates involved in the transportation and disposal of materials used to clean up spills.
- m. Describe the drums, if any, that Clean Harbors sent to Whitney Barrel Company, Inc. for recycling/reclamation, including:

- i. the time period during which drums were sent;
  - ii. the types of drums sent;
  - iii. the names and chemical composition of the materials stored in the drums;
  - iv. the quantity of materials contained in the drums;
  - v. the quantity of drums of each material sent; and
  - vi. information on any labels included on the drums.
  
- n. Identify any other drum/barrel recycling facilities that Clean Harbors sent drums to, including:
  - i. the name and address of each facility;
  - ii. the types of drums/materials sent to each facility (including the chemical composition of each material);
  - iii. the quantity of materials contained in the drums;
  - iv. the quantity of drums of each material sent to each facility; and
  - v. information on any labels included on the drums.
  
- o. Identify all Clean Harbors employees who currently have and those who have had knowledge of, or responsibility for the disposal, treatment, storage, or recycling of waste oils at the Murphy's Waste Oil Service, Inc. facility.
  
- p. Identify all Clean Harbors employees who currently and those who have had knowledge or, or responsibility for collecting waste oil from customers and transporting the waste oil to the Murphy's Waste Oil Service, Inc. facility.
  
- q. For the previous three responses, also provide each individual's:
  - i. job title;
  - ii. duties;
  - iii. dates performing those duties;
  - iv. supervisors for those duties;
  - v. current position or, if such individual is no longer employed by Clean Harbors, the date of the individual's resignation; and
  - vi. the nature of the information possessed by such individuals concerning Clean Harbors waste management at the Murphy's Waste Oil Service, Inc. facility.
  
- r. Identify all Clean Harbors customers who currently and those who have in the past transported their own waste oil to the Murphy's Waste Oil Service, Inc. facility for disposal, treatment, storage, or recycling. For each customer, identify the dates during which the customer hauled its waste oil to the facility.
  
- s. Describe how Clean Harbors managed pickups of waste oil, including:

- i. the method for inventorying each type of waste; and
  - ii. the amount charged or the rate charged for the pickup of the waste oil.
- t. Describe Clean Harbors' procedures for accepting payment for the disposal/placement of waste oil at the facility, including but not limited to:
  - i. the types of payment received (e.g., cash, check, money order);
  - ii. the frequency of the payments that were received;
  - iii. from whom those payments were received;
  - iv. the total amount of those payments and the rates paid;
  - v. where those payments were made (e.g., at the facility, sent in mail, etc.); and
  - vi. provide the identity of the Murphy's Waste Oil Service, Inc. employee/agent in charge of receiving and accounting for such payments.
- u. Provide copies of all documents (including but not limited to log books, dump slips, manifests, receipts, and invoices) created or kept by Clean Harbors related to the collection of materials (including, but not limited to, composition and quantity of materials) from customers whose materials were taken to the Murphy's Waste Oil Service, Inc. facility.
- v. Identify all liability insurance policies held by Murphy's Waste Oil Service, Inc. and Clean Harbors. In identifying such policies, state:
  - i. the name and address of each insurer and of the insured;
  - ii. the amount of coverage under each policy;
  - iv. the effective dates (policy period) for each policy;
  - v. whether the policy contains a "pollution exclusion" clause; and
  - vi. whether the policy covers sudden, non-sudden, or both types of accidents.

In lieu of providing this information, you may submit complete copies of all insurance policies that may cover the release or threatened release of hazardous materials at the Murphy's Waste Oil Service, Inc. facility.

- w. In its response to a CERCLA Section 104(e) Information Request for the Beede Waste Oil Site dated December 27, 1999, Clean Harbors stated that it hired a former employee of Murphy's Waste Oil Service in approximately 1992. Identify this employee, including:
  - i. the time period during which this individual was an employee of Murphy's Waste Oil Service; and
  - ii. the individual's day-to-day responsibilities.

- x. Identify whether Joan Murphy served as a consultant for Murphy's Waste Oil Service, Inc., including:
  - i. the time period during which she provided consulting services;
  - ii. the type of services she provided in this role;
  - iii. if Joan Murphy's responsibility included marketing Murphy's Waste Oil Service, Inc. to the public; and
  - iv. provide copies of any documents regarding or related to this arrangement and the services provided by Joan Murphy.
  
- y. Identify all current or former Clean Harbors employees and all other persons who have not been identified in response to the previous questions who have any knowledge of or information about the subject matter of any of the foregoing questions.
  
- z. Joan Murphy stated in her response to a CERCLA Section 104(e) Information Request dated February 9, 1988 that she had documentation for all of the Murphy's Waste Oil Service, Inc. small volume generators. Clean Harbors stated in its response to a CERCLA Section 104(e) Information Request dated December 27, 1999 for the Beede Waste Oil Site that a pre-transaction officer of Murphy's Waste Oil Service, Inc. prepared a list of customers for Clean Harbors after the sale. Identify those customers of Clean Harbors that were former Murphy's Waste Oil Service, Inc. customers. Provide any documentation Clean Harbors has regarding the pre-transaction customers of Murphy's Waste Oil Service, Inc. and any customer lists Clean Harbors has from late 1989 through the early 1990s.
  
- aa. Describe the process, if any, Clean Harbors used to contact former Murphy's Waste Oil Service, Inc. customers, including:
  - i. how these customers were contacted;
  - ii. how Clean Harbors characterized its relationship to Murphy's Waste Oil Service, Inc. in these communications; and
  - iii. provide copies of any letters sent to these customers or related information concerning the operation of the facility by Clean Harbors.

5. Information About Others

- a. If you have information concerning the operation of the facility or the Site or the source, content or quantity of materials placed/disposed at the facility or the Site which 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 facility or the Site.

6. 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.

## WELLS G & H

### ENCLOSURE B - INSTRUCTIONS

1. Answer Every Question Completely. You are required to provide a separate answer to each and every question and subpart of a question set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.
2. Number Each Answer. Number each answer with the number of the question to which it corresponds.
3. Provide Information about the Period Being Investigated. You are required to answer each question with respect to the period being investigated. If the response fails to address the period being investigated, EPA will consider this a failure to comply with the request and may take action against you for this noncompliance.
4. Provide the Best Information Available. You must provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in the preparation of your answer.
6. All Documents Must be Labeled. For each document submitted in response to this Information Request, indicate on the document (or in some other reasonable manner) the number of the question to which it responds.
7. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA. Failure to supplement your response within 30 days of discovering such responsive information may subject you to \$27,500 per day penalties. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. If any part of the response to this Information Request is found to be false, the signatory to the response and the company may be subject to criminal prosecution.
8. Complete the Enclosed Declaration. You are required to complete the enclosed declaration which certifies that the information you are providing in response to this Information Request is true, accurate, and complete.
9. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a

confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." In addition, please note that you bear the burden of substantiating your confidentiality claim. Your claim of confidentiality should be supported by the submission of information supporting such a claim; the type of information to be submitted is set out in 40 C.F.R. Part 2. Information covered by a claim of confidentiality will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. **If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.** You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

10. Objections to Questions. While the Respondent may indicate that it objects to certain questions in this Information Request, it must provide responsive information notwithstanding those objections. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.

11. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information." You should note however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you.

12. Claims of Privilege.

(a) If you claim any document responsive to this Information Request is a communication for which you assert a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege.

(b) If you claim any document responsive to this Information Request is a communication for which you assert a privilege exists for a portion of the document, identify the portion of the document for which you are asserting the privilege, and provide the basis for the assertion.

Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

13. Disclosure to EPA Contractor. Information which you submit in response to this Information Request will be disclosed by EPA to authorized representatives of the United States, pursuant to 40 C.F.R. 2.310(h), even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors, listed below, for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

**EPA CONTRACTOR LIST**

Updated March 24, 2005

**CONTRACTOR**

**CONTRACT NUMBER**

Arctic Slope Regional Corp.(ASRC) Aerospace  
Effective: 9/5/02

Contract No.: 68-R1-02-01

Booz, Allen & Hamilton  
Effective: 01/01/04  
Effective: 12/30/98

EPA IAG No. DW47940245  
GSA ANSWER Contract No.: GS09K99BHD0002

TechLaw, Inc.  
Effective: Effective July 12, 1999

GSA Contract No.: GS-10F-0168J

James Kerr and Associates, LLC  
Effective 9/04/2003

## WELLS G & H

### ENCLOSURE C - DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 et seq., RCRA, 42 U.S.C. Section 6901 et seq., or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

1. The term "you" or "Clean Harbors", except where otherwise indicated, shall mean Clean Harbors, Inc. and Clean Harbors Environmental Services, Inc. in the following capacities:
  - a. Clean Harbors, Inc. as the parent corporation of Murphy's Waste Oil Service, Inc.;
  - b. Clean Harbors Environmental Services, Inc. as the principal operating subsidiary of the holding company Clean Harbors, Inc.;
  - c. Clean Harbors Environmental Services, Inc. as the employer of all Murphy's Waste Oil Service, Inc. employees; and
  - d. Clean Harbors, Inc. (a/k/a Clean Harbors of Kingston, MA and Clean Harbors Environmental Services, Inc.) as a hazardous waste transporter that hauled waste to the Murphy's Waste Oil Service, Inc. facility prior to Clean Harbors of Kingston, MA's (a/k/a Clean Harbors, Inc.) purchase of the assets of Murphy's Waste Oil Service, Inc.
  
2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include but not be limited to:
  - (a) writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:
    - (1) invoice, receipt, endorsement, check, bank draft, cancelled check, deposit slip, withdrawal slip, order;
    - (2) letter, correspondence, fax, telegram, telex;
    - (3) minutes, memorandum of meetings and telephone and other conversations, telephone messages;
    - (4) agreement, contract, and the like;
    - (5) log book, diary, calendar, desk pad, journal;
    - (6) bulletin, circular, form, pamphlet, statement;
    - (7) report, notice, analysis, notebook;
    - (8) graph or chart; or
    - (9) copy of any document.
  - (b) microfilm or other film record, photograph, or sound recording on any type of

- device;
- (c) any tape, disc, or other type of memory generally associated with computers and data processing, together with:
    - (1) the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory; and
    - (2) printouts of such punch card, disc, or disc pack, tape or other type of memory; and
  - (d) attachments to or enclosures with any document as well as any document referred to in any other document.

3. The term "identify" or "provide the identity of" means, with respect to a natural person, to set forth:

- (a) the person's full name,
- (b) present or last known business and home addresses and telephone numbers;
- (c) present or last known employer (include full name and address) with job title, position or business; and
- (d) the person's social security number.

4. The term "identify" or "provide the identity of" means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth:

- (a) its full name;
- (b) complete street address;
- (c) legal form (e.g. corporation, partnership, etc.);
- (d) the state under whose laws entity was organized; and
- (e) a brief description of its business.

5. The term "identify" or "provide the identity of" means, with respect to a document, to provide:

- (a) its customary business description (e.g., letter, invoice);
- (b) its date;
- (c) its number if any (e.g., invoice or purchase order number);
- (d) the identity of the author, addressor, addressee and/or recipient; and
- (e) a summary of the substance or the subject matter.

Alternatively, Respondent may provide a copy of the document.

6. The terms "the period being investigated" and "the relevant time period" shall mean the period being investigated as specified on the first page of the Information Request Questions, unless otherwise defined in the Information Request Questions.

7. The term "facility" shall mean Murphy's Waste Oil Service, Inc., including all land and buildings located at 250 Salem Street; 252 and 252R Salem Street, under the ownership and/or management of all owners, operators, and lessees from 1919 to the present.

8. The term "material" or "materials" shall mean any and all objects, goods, substances, or matter

of any kind, including but not limited to wastes.

9. The term "Site" shall mean the property on or about the 330 acres of land in Woburn, Massachusetts currently identified by EPA as the Wells G & H Superfund Site.

10. The term "waste" or "wastes" shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

11. The term "waste oil" shall mean all used or spent oils, including but not limited to, fuel oils, lubricating oils, and transformer oil.

12. The term "Whitney Barrel Company, Inc". shall mean the land and buildings located at 256 Salem Street under ownership and/or management of all owners, operators and lessees of the facility since 1950.

## WELLS G & H

### ENCLOSURE D - SITE DESCRIPTION

Wells G & H were two municipal wells developed in 1964 and 1967 to supplement the water supply of the City of Woburn. The wells supplied 30 percent of the city's drinking water. The population of the City of Woburn is approximately 36,000 people.

In 1979, city police discovered several 55-gallon drums of industrial waste abandoned on a vacant lot in the vicinity of the site; these drums subsequently were removed. As a result of this finding, the nearby wells were tested and found to be contaminated. Both of these wells were shut down in 1979. Five separate properties were found to be the contributing sources of contamination to the aquifer that supplied the water to the two municipal wells. The Wells G & H site covers a total area of 330 acres which encompass commercial and industrial parks, recreational and residential areas in East Woburn. The site is bounded by Route 128 to the north, Route 93 to the east, the Boston and Maine Railroad to the west, and Salem Street and Cedar Street to the south. The area surrounding the site is predominantly residential. The Aberjona River flows through the middle of the site. Primary contaminants include volatile organic compounds including trichloroethylene (TCE) and tetrachloroethylene (PCE), polycyclic aromatic hydrocarbons (PAHs) and heavy metals.

The Southwest Properties are located in the Aberjona River Valley in the southwestern corner of the Wells G&H Superfund Site. Similar to many agriculturally and commercially developed valleys in New England, the Aberjona River Valley (including the Southwest Properties) was attractive to development because it has a relatively low topographic relief, is easily constructed upon, and is underlain by a valley-fill aquifer that is capable of supplying large quantities of water. As such, the Aberjona River Valley has a long history of industrial uses. The valley also has a lengthy agricultural history.

The primary identified site contaminants in soils, sediments, and groundwater across the Southwest Properties include the following constituents, broken down by contaminant type. These include:

VOCs, including benzene, petroleum hydrocarbons, methyl tertiary butyl ether, tetrachloroethene, trichloroethene, and vinyl chloride;

Semivolatile organic compounds, including benzo(a)anthracene, and benzo(a)pyrene;

Pesticides, such as alpha-chlordane and gamma chlordane;

PCB Aroclors, such as 2,3',4,4'5-PentCB(118) and 3,3'4,4'5,-PentaCB(126); and

Metals, including arsenic, cadmium, chromium, and lead.

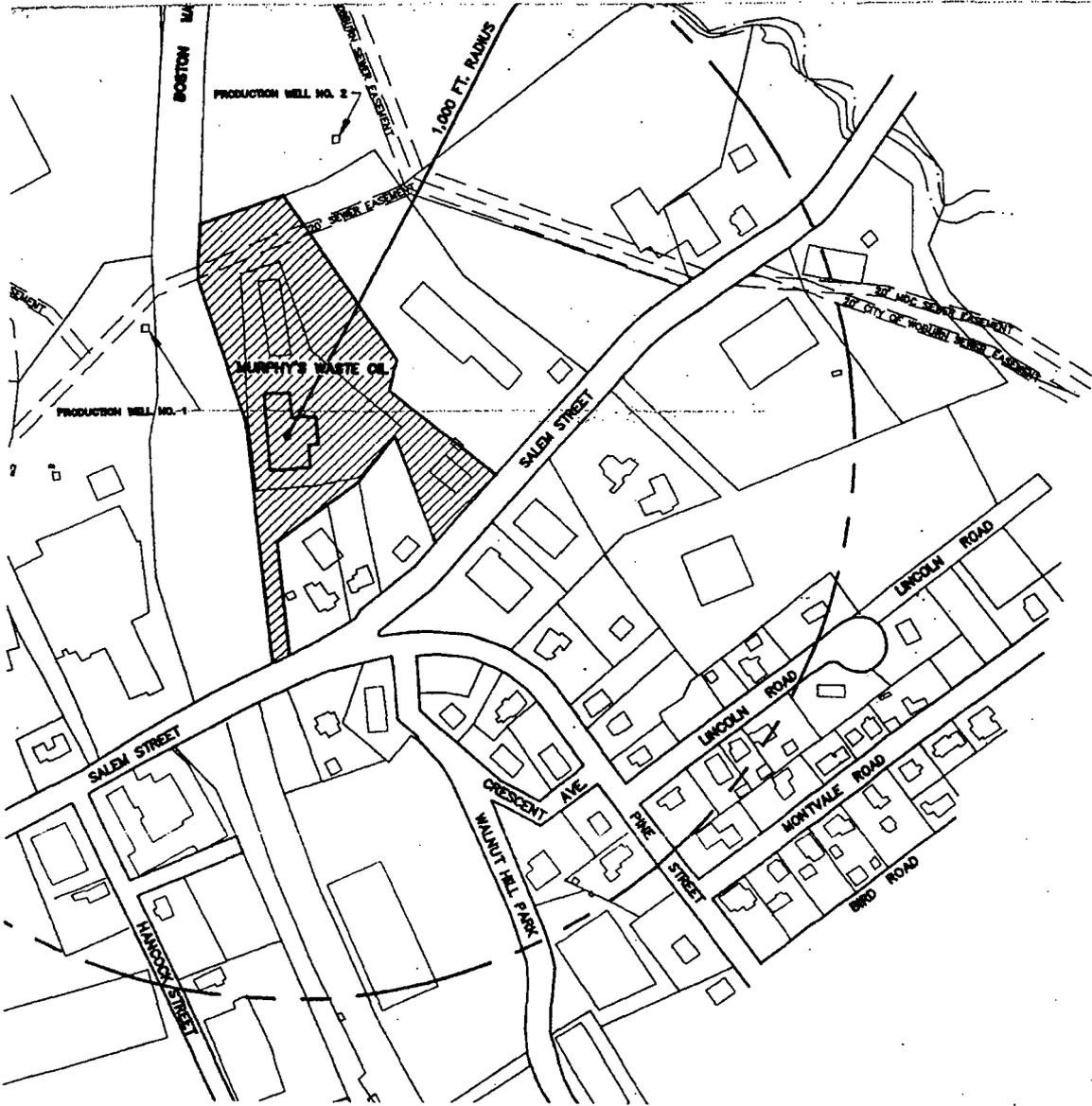
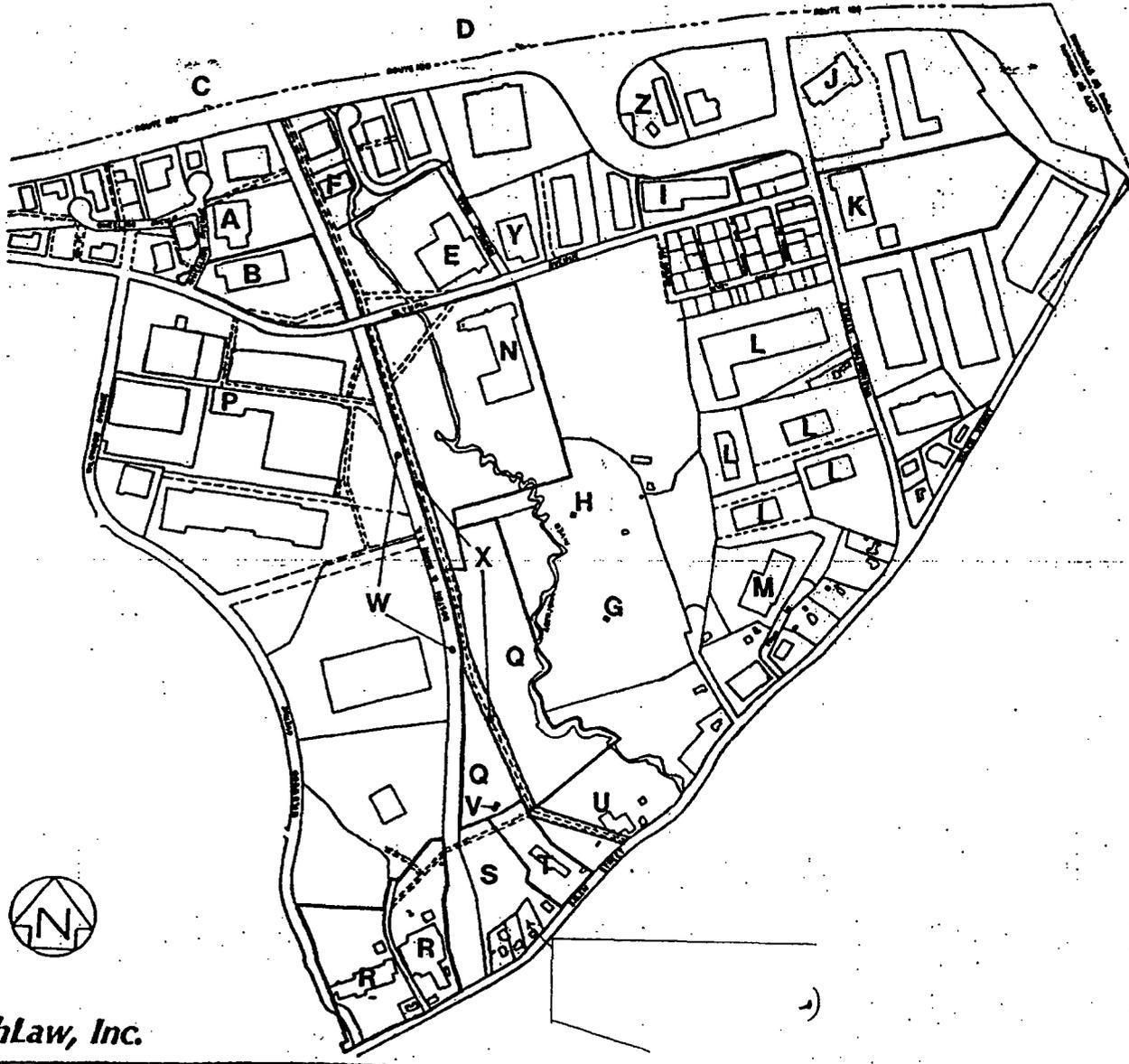


FIGURE 5

B	RCRA PART B SUBMITTAL UPDATE	K.M.C.	P.A.A.	P.A.A.	1/31/94
A	RCRA PART B SUBMITTAL	K.M.C.	P.A.A.	P.A.A.	1/8/93
ISSUE	DESCRIPTION	DRWN.	CHKD.	APPR.	DATE

**CleanHarbors**  
 ENVIRONMENTAL SERVICES, INC.  
 325 Wood Road  
 Braintree, Massachusetts 02184  
 Telephone (617) 849-1200/1800

TITLE **MURPHY'S WASTE OIL SERVICE, INC.**  
 252 SALEM STREET  
 WOBURN, MASSACHUSETTS 01801



KEY	
SYMBOL:	DESCRIPTION:
A	Major Glass Company
B	Weyerhaeuser Company
C	MBTA Property -Was used as dump
D	Brodie Inc.
E	Northern Research & Eng.
F	Economics Laboratory
G	Municipal Well G
H	Municipal Well H
I	Unifirst Corporation
J	Crest Buick
K	W.R. Grace & Co. Inc.
L	West Cummings Park
M	New England Plastics Corp. Tenant: Prospect Tool & Die
N	Truck Terminal Property Tenants: United Truck Leasing Nunes Bros. Roadway Package Systems North Shore Bus Company
P	S.S. Pierce
Q	Wetlands Property
R	Tannery Property
S	Murphy's Waste Oil Service
T	Whitney Barrel Co.
U	Aberjona Auto Parts
V	Riley Tannery production well
W	B & M Railroad tracks
X	Dirt access road -Includes MDC and Woburn sewer easements.
Y	Siegal Realty Trust
Z	Woburn Foreign Motors

FIG. 1: Wells G & H Study Area, Woburn, MA

**LEGEND**  
 Bold parcel outlines indicate parcels investigated during title search.  
 Dashed lines indicate easements.



SOURCE: DERIVED FROM TITLE SEARCH FIG. 2

TechLaw, Inc.

**WELLS G & H**

**ENCLOSURE F - DECLARATION**

I declare under penalty of perjury that I am authorized to

respond on behalf of \_\_\_\_\_ and that the  
Respondent

foregoing is complete, true, and correct.

Executed on \_\_\_\_\_, 2\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Type Name

\_\_\_\_\_  
Title [if any]