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2 Your Internal Billing Reference: 1000-601900-10828US

3 To Recipient's Name: Martha Bosworth Phone: 617-918-1407
Enforcement Coordinator
 Company: U.S. Environmental Protection Agency

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Kevin Loftus
Deputy General Counsel

Prudential Tower Building
Boston, MA 02199-8004
Tel 617.421.7880
Fax 617.421.7866
kevin_loftus@gillette.com

August 23, 2005

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

Re: Response to Information Request for the former Whitney Barrel Company facility at the Wells G&H Superfund Site in Woburn, Massachusetts

Dear Ms. Bosworth:

On behalf of The Gillette Company ("Gillette"), this letter and the attachments respond to EPA's Request for Information, transmitted by letter dated June 21, 2005, from Bruce A. Marshall to Edward F. DeGraan, relating to the former Whitney Barrel Company facility at the Wells G&H Superfund Site in Woburn, Massachusetts.

The Request for Information is extremely broad and asks for information that goes substantially beyond Gillette's relationship with the former Whitney Barrel Company facility that is the subject of EPA's investigation. In particular, questions 2, 3, 4 and 5 ask for information relating to Gillette's legal status, operations, wastes and waste streams, and disposal/storage/treatment/storage/recycling/sale of waste in at least four states and for a thirty-five year period (1950-1985), commencing fifty-five years ago. Because of the breadth of the request and the passage of time, it is difficult to state with reasonable certainty that the information Gillette is providing is either complete or, perhaps, wholly accurate. Rather, Gillette is responding to EPA's Request for Information based on a reasonable, diligent search for and review of information that is currently available.

Further, Gillette has previously responded to Requests for Information relating to other Superfund sites in EPA Region I, including the Sutton Brook Disposal Area Superfund Site, the Shaffer Landfill, the Charles George Landfill, the Silresim Superfund Site, and the Solvent Recovery Systems of New England Superfund Site. In response to those requests, Gillette has previously provided EPA with many boxes of documents relating to the wastes generated at its facilities, including, *inter alia*: internal memoranda describing the off-site disposal of Gillette's waste; agreements with and invoices from Gillette's waste haulers; and Gillette's own agreements with off-site disposal facilities. We are not enclosing with this submission the voluminous documents that Gillette has previously provided to EPA. To Gillette's knowledge,

0076-0011

however, none of the documents previously provided to EPA refers or relates to Gillette's relationship with the former Whitney Barrel Company facility.

Following EPA's review of this letter and the attachment, please contact me at 617-421-7880 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Kevin Loftus". The signature is written in a cursive style with a large, prominent "K" and "L".

Kevin Loftus

GILLETTE'S RESPONSES TO INFORMATION REQUEST QUESTIONS

Gillette's numbered responses correspond to the numbered questions in EPA's

Information Request, as follows:

1.
 - a. The Gillette Company
Prudential Tower Building
Boston, MA 02199
 - b. Kevin Loftus
Deputy General Counsel
(same address as above)
617-421-7880
 - c. Same as 1.b above
 - d. Sutton Brook Disposal Area Superfund Site; the Shaffer Landfill; the Charles George Landfill; the Silresim Superfund Site; Solvent Recovery Systems of New England Site.
2.
 - a. The American Safety Razor Company was founded in 1901, reorganized as Gillette Safety Razor Company in 1917, and renamed The Gillette Company in 1952.
 - b.
 - i. 1917
 - ii. Delaware
 - iii. CT Corporation
101 Federal Street
Boston, MA 02110
 - c. See 2.a above
 - d. Not applicable
 - e. See 2.a above
 - f. Not applicable
 - g. Not applicable
3.
 - a. Andover Manufacturing Center ("AMC")
30 Burt Road
Andover, MA 01810

South Boston Manufacturing Center ("SBMC")
Gillette Park
Boston, MA 02106

b. AMC: manufacture of toiletry products; operational 1969 to present.

SBMC: manufacture of blades and razors; operational 1907 to present.

c. Enclosed with these responses are marked versions of Enclosure F for AMC and SBMC, showing constituents that would have been produced, processed or used, or would have been present in materials produced, processed or used, during the relevant period, based on available information. Because of the passage of time since the end of the relevant period in 1985, some of the responses on Enclosure F are based on conjecture that the constituents present at AMC and SBMC during the relevant period may have been the same as the constituents known to be present after the relevant period. Many of the constituents listed on Enclosure F would have been present in small concentrations in materials used at AMC or SBMC, or would have been used in small quantities at AMC or SBMC.

d. The size of the operations at AMC and SBMC has gradually expanded over time. Toiletry products were manufactured at SBMC before AMC became operational in 1969. Otherwise, the nature of operations has not changed substantially.

e. AMC: manufactures antiperspirants, deodorants, shave products (e.g., Right Guard, Gillette Series).

SBMC: manufactures razors and blades.

f. AMC: ethanol, perfume oils, soaps, waxes, mineral oils, aluminum-zirconium salt, propellants, gases, cans, glass containers, metal tubes.

SBMC: stainless steel, brass, aluminum, plastics, soaps, oils, solvents, acids, corrugated paper, chipboard.

g. At AMC and SBMC, a water wash down would have been the principal method of cleaning the machinery during the relevant period. There also would have been a manual wipe down of certain machinery using industrial rags. The quantity of the materials used is unknown.

h. Gillette is unaware of any specific spills that occurred at AMC and SBMC during the relevant time period. To the extent there may have been spills of non-hazardous materials at AMC (shave creams, soaps, oils, or other cosmetics), they would have been flushed to the municipal sewer system.

i. The various operations at AMC (high speed aerosol filling, formulation/batch preparation, chemical mixing, high speed liquid filling, and packaging) and at SBMC (razor manufacturing, including metal stamping, plating and assembly, blade coating, steel hardening, steel sharpening, perforating operations, and packaging) are too complex to diagram fully. Gillette respectfully requests that EPA describe the specific operations, if any, it is necessary to diagram.

j. Marc J. Phaneuf
Purchasing Agent, AMC

Robert Healey
Former Director of Environmental Affairs, Gillette

Frank Dolliver
Former Fork Truck Operator, SBMC
Former Planning & Material Control & MIS Director, AMC

Richard Geary
Former Safety Manager, AMC

William O'Rourke
Former Plant Facility Manager, SBMC

James McKallagat
Mix and Formulation Supervisor, AMC

4. a-e. The responses to the enclosed Waste Survey incorporate available information relating to Gillette's wastes and waste streams. Because of the passage of time since the end of the relevant period in 1985, some of the responses to the Waste Survey are based on conjecture that the wastes and waste streams generated during the relevant period may have been the same as the wastes and waste streams known to be generated after the relevant period.

f. See 3.j above

5. a-d. During the relevant period, at both AMC and SBMC, wastes were handled by the particular departments that generated the wastes and not by a centralized function. As a result, Gillette does not have detailed information regarding the numerous individuals who were responsible for handling waste or who may have information regarding the various waste streams during the relevant period. In addition to the individuals listed in 3.j above, the individuals responsible for these matters currently are as follows:

William Smith

Senior Environmental Specialist, AMC
Supervisor – Patrick Ladd, Facility Manager, AMC

Sandra Bissett
Manager of Environmental Affairs and Safety, SBMC
Supervisor – Alfredo Castro, Facility Manager, SBMC

Steven Fradkoff
Environmental Project Engineer, SBMC
Supervisor – Sandra Bissett, Manager of Environmental Affairs and Safety, SBMC

e-v. The responses to the enclosed Waste Survey incorporate available information relating to the disposal of Gillette's wastes and waste streams.

Generally, at AMC waste streams were disposed of during the relevant period as follows:

- When the plant became operational in 1969, liquid sanitary waste and overflow from the liquid mixing room flowed to the Andover Sewer System. Sometime around 1974, the Andover Sewer System became part of the Greater Lawrence Sanitary District ("GLSD") and AMC continued to send the same waste there. From 1969 to 1982, process wastewater was disposed of on-site in wastewater lagoons; subsequently, process wastewater was disposed of at GLSD.
- Wastes from the cream mix room were held on site in a holding tank, then pumped out and disposed of at the Reading interceptor of the Metropolitan District Commission ("MDC") system. Later, when the MDC was unavailable for such waste it was managed at AMC via holding ponds and spray irrigation. Later, it was sent to the GLSD.
- In 1982, AMC began to operate a permitted Resource Recovery Facility ("RRF"). After 1982, reject and defective aerosol containers, mix room wastes, and ordinary solid wastes including oils, filters and polymers, were sent to the RRF.
- From 1969 to approximately 1972, nearly all solid waste was sent to the Andover Landfill. From approximately 1972 until the RRF became operational, most solid waste was sent to the Charles George Landfill. AMC's waste transporters included P&T Refuse (for disposal at the Andover Landfill and perhaps other sites) and the Charles George Trucking Company (for disposal at the Charles George Landfill). Some waste (e.g., cardboard) is believed to have been sent to a recycling facility. Some waste also was believed to have been sent to RESCO, a waste-to-energy facility in Saugus, MA.

- After the passage of RCRA, hazardous wastes were properly labeled, manifested and disposed of at RCRA permitted facilities.

Gillette does not possess information relating to SBMC's disposal of waste streams during the relevant period, following consultation with current employees and a search for documents. There may be information relating to SBMC's waste disposal in prior responses to EPA Requests for Information relating to other Superfund sites, but Gillette believes those prior responses do not refer or relate to Whitney Barrel Company.

6. a. AMC: MAD 053483467
SBMC: MAD 066605809

b-g. Gillette may have filed hazardous waste generator reports for AMC or SBMC during the relevant period. At SBMC, Gillette also may have filed reports in connection with its NPDES permit for discharge of non-contact cooling water, or in connection with its discharge of rinsewaters from washing operations to the Massachusetts Water Resources Authority. Gillette is unaware of any other environmental reporting to federal or state governments during the relevant period, but cannot rule it out.

7. a. As described further below, during a portion of the relevant period Whitney Barrel Company ("Whitney") purchased and transported used, empty drums from Gillette for Whitney's reconditioning and sale to third parties.

b. No.

c. i. Gillette does not currently possess information relating to the dates of each pickup of used, empty drums by Whitney. Generally, Whitney picked up used, empty drums from AMC from the time AMC became operational in 1969 through the end of the relevant period in 1985 (although, as explained in 7.c.ii below, the types of drums changed over time). Whitney also picked up used, empty drums from SBMC during a period beginning before 1965 and continuing through at least 1969.

ii. The types of containers that Whitney picked up from Gillette were either steel or fiber drums. Whitney picked up both steel and fiber drums from AMC from 1969 through the late 1970s; thereafter, Whitney picked up only fiber drums from AMC. The fiber drums contained plastic liners that were removed and disposed of by AMC before Whitney picked up the drums.

iii. Gillette believes that most or all of the drums that Whitney picked up were 55-gallon drums.

iv. Gillette believes that the drums would have been in good, reusable condition.

v. Whitney picked up empty drums from Gillette. Generally, when Gillette received the drums they contained raw materials for use in Gillette's operations. As explained in 7.c.ii above, the fiber drums contained plastic liners that were removed. Gillette does not know the extent to which the steel drums contained empty barrel residues when picked up by Whitney.

vi. Gillette has been unable to locate documentation relating to its dealings with Whitney.

d. No, except that Gillette understood that Whitney reconditioned the drums it picked up from Gillette and resold them to third parties.

e. No.

f. No.

g. None.

h. None.

i. See 3.j above

8. a-c. None.

9. a.

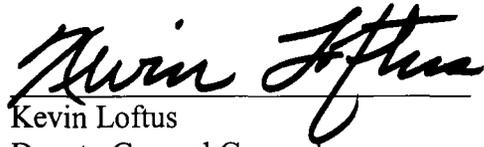
i-iv. See 3.j and 5a-d above

v-viii. Efforts were made to locate responsive documents maintained by AMC and SBMC, but no documents relating to Whitney were located. Gillette has previously provided to EPA voluminous documents relating to wastes generated by AMC and SBMC in response to other Requests for Information relating to other Superfund sites, but to Gillette's knowledge, none of those documents refers or relates to Gillette's relationship with Whitney.

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of The Gillette Company and that the foregoing is complete, true and correct, to the best of The Gillette Company's knowledge following a reasonable, diligent search of information currently available.

Executed on August 23, 2005

A handwritten signature in black ink, appearing to read "Kevin Loftus", written over a horizontal line.

Kevin Loftus
Deputy General Counsel
The Gillette Company

ENCLOSURE E-WASTE SURVEY

Name of Respondent: The Gillette Company

Respondent's Location: Andover, MA

Date: 8/22/05

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
X	Acids	Liquid	Neutralized Hydrochloric/Sulfuric	Unknown	1969-1985: Sewer (Note: no acids were ever sent to sewer without prior neutralization)
X	Adhesives	Glues on discarded packaging	N/A	Small Quantities	1969-1982: Andover Landfill/Charles George Landfill 1982-1985: Onsite permitted resource recovery facility (RRF)
	Adsorbents (From Spills, Leaks, Etc.)				
X	Asbestos	Solid	Insulation	Small Quantities	Dec-Tam Removal Company
	Automotive Related Wastes:				
	Antifreeze				
X	Batteries	(from Gillette fork trucks -- solid with liquid inside)	Lead/acid battery	Small Quantities	1969-1985: Reclamation
	Brake Fluids				
	Degreasers				
	Lubricants				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
	Oils				
	Oil Filters				
	Transmission Fluids				
	Batteries				
	Bleaches				
X	Caustics/Alkalis	Liquid	Neutralized Sodium Hydroxide	Unknown	Sewer (Note: No NaOH was sent to sewer without prior neutralization)
X	Chemicals	Liquid/Sludge	Washdowns containing non-hazardous residuals	Varies	Onsite spray pond
X	Chemicals	Liquid/Sludge	Mix vessel flush outs of non-hazardous residue/materials	Varies between 900 gal./month to 9000 gal./month	1969-1985: Reclaimed and reused
X	Chemicals	Liquid/Sludge	Mix vessel flush outs of hazardous residue/materials (i.e., alcohol, low-flash silicon)	1969-1985: Approx. 1,000 gal./month	1969-1985: Onsite spray pond
	Cleaning Compounds or Fluids				
	Coolants				
X	Degreasers	Liquid	Permag/1, 1, 1 TCE	Approx. 25 gal./month	1970-1982 onsite irrigated spray pond 1982-1985: Drummed by Gillette and sent offsite as hazardous waste to unknown

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
					solvent reclaimer
	Disinfectants				
	Distillation Byproducts (Still Bottoms)				
	Dyes				
X	Etching Solutions	Unknown	Oakite "Super Rustripper"	Unknown	1969-1982: Spray Pond 1982-1985: Shipped to Treatment Storage Disposal Facility
X	Filters	Paper/fiber filters containing waxes, perfumes, alcohols and powders	Varies	Unknown	1969-1982: Andover Landfill/Charles George Landfill 1982-1985: Onsite permitted resource recovery facility
X	Filters	Solid/Sludge	Oil	Varies	1969-late 1980s: Andover Landfill/Charles George Landfill
X	Flammable, Reactive, or Explosive Materials	See last page: Reject Aerosol			
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
X	Laboratory Wastes	Liquid	Solvents, Acids	Approx. 20 gal./month ('69 - '85)	1969-1982: Spray Ponds 1982-1985: Lab-Packed and

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
					shipped to Treatment Storage Disposal Facility
X	Lubricants	Liquid/55 gal. Drums	Unknown	Minimal (approx. 2 drums/year)	1969-late 1980's: Oil and water to Charles George Landfill
	Metals:				
	Grindings				
	Powders				
	Shavings				
	Sludges				
	Solutions				
	Other:				
	Paint and Coating Wastes:	For Facilities Maintenance Only:			
X	Paint	Residual in empty 5 gal. Pails	Unknown	Minimal	1969-late 1980's: Andover Landfill/Charles George Landfill
	Pigments				
	Stripper				
	Stains				
X	Thinner	Residual in empty 5 gal. Pails	Unknown	Minimal	1969-late 1980's: Andover Landfill/Charles George Landfill
X	Turpentine	Residual in empty 5 gal. Pails	Unknown	Minimal	1969-late 1980's: Andover Landfill/Charles George Landfill
X	Varnish	Residual in empty 5 gal. Pails	Unknown	Minimal	1969-late 1980's: Andover Landfill/Charles George

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
					Landfill
	Other				
	PCBs (Polychlorinated Biphenyls)				
	Pesticides				
	Photocopying Wastes:				
	Toners				
	Other:				
	Photography Wastes:				
	Developers				
	Fixers				
	Other:				
	Plating Solutions				
	Pretreatment Sludges/Solutions (Sewage)				
	Printing Wastes:				
X	Inks (for coding Cans)	Empty 1 pint or 1 gal. Cans	Unknown	Unknown	1969-late 1980's: Andover Landfill/Charles George Landfill
	Dyes				
	Other:				
X	Rags, Used (Indicate Prior Use)	With ink and solvent	Varies	Unknown	1969-late 1980's: Andover Landfill/Charles George Landfill

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
	Rodenticides				
X	Septic System Wastes	Unknown	Unknown	Unknown	1969-early 1980's: MDC System via Reading by unknown cesspool pumping contractor Early 1980's-1985: Greater Lawrence Sanitary District (GLSD)
	Soldering Solutions				
	Solutions of Polymer, resins, plastics				
	Solvent Extracts				
X	Solvents	Liquid/55 gal. Metal drum	111 TCE, chlorinated base materials, freons	Unknown	1969-1982: Onsite spray ponds 1982-1985: Shipped to Treatment Storage Disposal Facility
X	Waste Oils	Liquid/55 gal. Metal drum	Oil	Minimal (9 gal./month)	1969-1982: unknown 1982-1985: Onsite permitted resource recovery facility
	Wood Preservatives				
X	Other:				
X	Reject Aerosols	Cans/Containers	Foamy™, Right Guard™, etc.	1969-1982: Approx. 1800 lbs/day 1982-1985: Approx. 1800lbs-2200 lbs/day	1969-1982: Andover Landfill/Charles George Landfill 1982-1985: Onsite permitted resource recovery facility
X	Waste Perfume	Liquid/55 gal. Metal	Varies	Very Minimal	1969-1982: small amounts to

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
	Oils	drums			onsite spray pond 1969-1982: small amounts to Andover Landfill/Charles George Landfill 1982-1985: Onsite permitted resource recovery facility

The Gillette Company
Andover, MA

WELLS G & H
ENCLOSURE F- CONSTITUENT LIST.

Petroleum Hydrocarbons

C11 - C22 Aromatic Hydrocarbons	C9 - C10 Aromatic Hydrocarbons
C19 - C36 Aliphatic Hydrocarbons	C9 - C12 Aliphatic Hydrocarbons
C5 - C8 Aliphatic Hydrocarbons	C9 - C18 Aliphatic Hydrocarbons

Herbicides

2,4,5-T (2,4,5-trichlorophenol)	2,4-D (2,4-dichlorophenoxyacetic acid)
2,4,5-TP (Silvex) (alpha-(2,4,5-trichlorophenoxy)propionic acid)	2,4-DB (magnesium bis(2,3-dibromopropyl)phosphate)

Metals

Aluminum	Antimony
Arsenic	Barium
Beryllium	Boron
Cadmium	Calcium
Chromium	Hexavalent Chromium
Cobalt	Copper
Cyanide	Iron
Lead	Lithium
Magnesium	Manganese
Mercury	Molybdenum
Nickel	Phosphorus

Potassium	Selenium
Silica	Silver
Sodium	Strontium
Thallium	Tin
Titanium	Vanadium
Zinc	

Polychlorinated Biphenyl (PCB) Aroclors

Aroclor 1016	Aroclor 1221
Aroclor 1232	Aroclor 1242
Aroclor 1248	Aroclor 1254
Aroclor 1260	

Polychlorinated Biphenyl (PCB) Congeners

PCB 105	PCB 114
PCB 118	PCB 123
PCB 126	PCB 156/157
PCB 157	PCB 167
PCB 169	PCB 170
PCB 189	PCB 193/180
PCB 77	PCB 81

Pesticides

4,4'-DDD (1,1-bis(4-chlorophenyl)-2,2-dichloroethane)	4,4'-DDE (2,2-bis(p-chlorophenyl)-1,1-dichloroethylene)
4,4'-DDT (1,1-bis(4-chlorophenyl)-2,2,2-trichloroethane)	Aldrin

a-BHC	b-BHC
d-BHC	g-BHC
BHC	Chlordane
Dieldrin	Endosulfan
Endosulfan I	Endosulfan II
Endosulfan sulfate	Endrin
Endrin aldehyde	Endrin ketone
Heptachlor	Heptachlor epoxide
Methoxychlor	a-Chlordane
g-Chlordane	Toxaphene

Semivolatile Organic Compounds (SVOCs)

(Constituents in Larger Chemicals) (dates unknown)

1,1'-Biphenyl		Benzo(b)Fluoranthene
1,2,4-Trichlorobenzene	X	Benzo(g,h,i)perylene
1,2-Dichlorobenzene		Benzo(k)Fluoranthene
1,3-Dichlorobenzene		Benzoic acid
1,4-Dichlorobenzene		Benzyl alcohol
2,2'-Oxybis(1-Chloropropane)		Bis(2-chloroethoxy) methane
2,4,5-Trichlorophenol		Bis(2-chloroethyl) ether
2,4,6-Trichlorophenol		Bis(2-chloroisopropyl) ether
2,4-Dichlorophenol		Bis(2-ethylhexyl) phthalate
2,4-Dimethylphenol		Butyl benzyl phthalate
2,4-Dinitrophenol		Caprolactam
2,6-Dinitrotoluene		Carbazole
2-Chloronaphthalene		Chrysene
2-Chlorophenol		Cresol
2-Methylnaphthalene		Dibenz(a,h) anthracene
2-Methylphenol		Dibenzofuran

2-Nitroaniline	Diethyl phthalate	
2-Nitrophenol	Dimethyl phthalate	
3,3'-Dichlorobenzidine	Di-n-butyl phthalate	
3-Nitroaniline	Di-n-octyl phthalate	
4,6-Dinitro-2-methylphenol	Fluoranthene	
4-Bromophenyl phenyl ether	Fluorene	
4-Chloro-3-Methylphenol	Hexachlorobenzene	
4-Chloroaniline	Hexachlorocyclopentadiene	
4-Chlorophenyl phenyl ether	Hexachloroethane	
4-Methylphenol	Indeno(1,2,3-cd)pyrene	
4-Nitroaniline	Isophorone	
4-Nitrophenol	Naphthalene	X
Acenaphthene	Nitrobenzene	
Acenaphthylene	N-Nitrosodi-n-propylamine	
Acetophenone	N-Nitrosodiphenylamine	
Aniline	p-Chlorotoluene	
Anthracene	Pentachlorophenol	
Atrazine	Phenanthrene	
Benzo(a)Anthracene	Phenol	
Benzo(a)Pyrene	Pyrene	

Volatile Organic Compounds (VOCs)

(Constituents in Larger Chemicals) (dates unknown)

1,1,1-Trichloroethane	X	Chloroform	X
1,1,2,2-Tetrachloroethane	X	Chloromethane	X
1,1,2-Trichloro-1,2,2-trifluoroethane		cis-1,2-Dichloroethene	X
1,1,2-Trichloroethane	X	cis-1,3-Dichloropropene	X
1,1-Dichloroethane	X	Cyclohexane	

1,1-Dichloroethene	X	dibromochloromethane	
1,2,3-trichlorobenzene	X	Dibromomethane	X
1,2,4-Trichlorobenzene		Dichlorodifluoromethane	X
1,2,4-Trimethylbenzene	X	ethanol	
1,2-Dibromo-3-chloropropane		Ethyl ether	
1,2-dibromoethane		Ethyl methacrylate	
1,2-Dichlorobenzene	X	Ethylbenzene	X
1,2-Dichloroethane	X	Ethylenedibromide	
1,2-Dichloroethene (total)		Fluorotrichloromethane	
1,2-Dichloropropane	X	freon-114	
1,3,5-Trimethylbenzene	X	freon-12	
1,3-Dichlorobenzene	X	halothane	
1,3-Dichloropropane	X	Hexachlorobutadiene	X
1,4-Dichlorobenzene	X	Iodomethane	
1,4-Dichlorobutane		isopropyl alcohol	
2,2-Dichloropropane	X	Isopropylbenzene	X
2-Butanone (MEK)	X	Methyl acetate	
2-Chloroethyl vinyl ether		Methyl cyclohexane	
2-Chlorophenol		methyl isobutyl ketone (MIBK)	
2-Hexanone	X	Methyl tert-butyl ether	X
4-bromofluorobenzene		Methylene chloride	
4-chlorotoluene	X	Naphthalene	
4-Methyl-2-pentanone	X	n-Butylbenzene	X
Acetone	X	n-Propylbenzene	
acetonitrile		o-Chlorotoluene	
Acrolein		p-Isopropyltoluene	X
Acrylonitrile		sec-Butylbenzene	
Benzaldehyde		Styrene	X
Benzene	X	tert-Butylbenzene	X

Bromobenzene	X	Tetrachloroethene	
Bromochloromethane	X	Toluene	X
Bromodichloromethane	X	trans-1,2-Dichloroethene	X
Bromoform	X	trans-1,3-Dichloropropene	X
Bromomethane	X	trans-1,4-Dichloro-2-butene	
Carbon disulfide		Trichloroethene	X
Carbon tetrachloride	X	Vinyl Acetate	
Chlorobenzene		Vinyl chloride	X
Chlorodibromomethane		Xylenes (total)	
Chloroethane			

ENCLOSURE E-WASTE SURVEY

Name of Respondent: The Gillette Company

Respondent's Location: South Boston, MA

Date: 8/22/05

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
X	Acids	Liquid + sludge (?)			
X	Adhesives	Permaband (?)	Super glue		
X	Adsorbents (From Spills, Leaks, Etc.)	Probably		Incidental spills	
	Asbestos				
	Automotive Related Wastes:				
X	Antifreeze	HVAC systems			
X	Batteries	(from fork trucks)			
	Brake Fluids				
X	Degreasers	Liquid + sludge (?)	TCE, PERC, TCA		
	Lubricants				
X	Oils	Oily solids + liquids			
X	Oil Filters	Maybe from equipment			
	Transmission Fluids				
	Batteries				
	Bleaches				
X	Caustics/Alkalis	Liquid soaps			
	Chemicals				
X	Cleaning	Liquid soaps			

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
	Compounds or Fluids				
	Coolants				
	Degreasers				
	Disinfectants				
X	Distillation Byproducts (Still Bottoms)	Still bottoms	TCE		
	Dyes				
X	Etching Solutions	Acids (small quantity)			
	Filters				
X	Flammable, Reactive, or Explosive Materials	Flammable solvents	Acetone		
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes				
X	Lubricants	Oils			
	Metals:				
	Grindings				
	Powders				
	Shavings				
X	Sludges	Plating (?)			
X	Solutions	Plating (?)			
	Other:				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
	Paint and Coating Wastes:				
X	Paint	From maintenance			
	Pigments				
	Stripper				
	Stains				
	Thinner				
	Turpentine				
	Varnish				
	Other				
	PCBs (Polychlorinated Biphenyls)				
	Pesticides				
	Photocopying Wastes:				
	Toners				
	Other:				
	Photography Wastes:				
X	Developers	Small quantity			
X	Fixers	Small quantity			
	Other:				
	Plating Solutions				
	Pretreatment Sludges/Solutions (Sewage)				
	Printing Wastes:				

	Substance	Physical State when Disposed/Type of Container (e.g. Liquid/5 gal pails, Sludge/55 gal drums, Solid/directly in dumpster.)	Trade Name/Chemical Composition (e.g. Nitric acid/HNO ₃ , Tetrahydrofuran/C ₄ H ₈ O.)	Volume (per month)	Disposal Method and Location (year) (e.g. dumpster ('55-68), [Name] Landfill ('69-81), [Name] Solvent Reclaimer ('82-'91).
X	Inks	Small quantity			
X	Dyes	Stationary product subs			
	Other:				
X	Rags, Used (Indicate Prior Use)	Oily rags			
	Rodenticides				
	Septic System Wastes				
	Soldering Solutions				
X	Solutions of Polymer, resins, plastics	Plastics			
	Solvent Extracts				
X	Solvents		TCE, PERC, TCA, Acetone		
	Waste Oils				
	Wood Preservatives				
	Other:				

WELLS G & H
 ENCLOSURE F- CONSTITUENT LIST

Petroleum Hydrocarbons

C11 – C22 Aromatic Hydrocarbons	C9 – C10 Aromatic Hydrocarbons
C19 – C36 Aliphatic Hydrocarbons	C9 – C12 Aliphatic Hydrocarbons
C5 – C8 Aliphatic Hydrocarbons	C9 – C18 Aliphatic Hydrocarbons

Herbicides

2,4,5-T (2,4,5-trichlorophenol)	2,4-D (2,4-dichlorophenoxyacetic acid)
2,4,5-TP (Silvex) (alpha-(2,4,5-trichlorophenoxy)propionic acid)	2,4-DB (magnesium bis(2,3-dibromopropyl)phosphate)

Metals

Aluminum	x	Antimony
Arsenic		Barium
Beryllium		Boron
Cadmium		Calcium
Chromium		Hexavalent Chromium
Cobalt		Copper
Cyanide		Iron
Lead		Lithium
Magnesium		Manganese
Mercury		Molybdenum
Nickel		Phosphorus

(Used aluminum, brass, stainless steel in manufacturing)

Potassium	Selenium
Silica	Silver
Sodium	Strontium
Thallium	Tin
Titanium	Vanadium
Zinc	

Polychlorinated Biphenyl (PCB) Aroclors

Aroclor 1016	Aroclor 1221
Aroclor 1232	Aroclor 1242
Aroclor 1248	Aroclor 1254
Aroclor 1260	

Polychlorinated Biphenyl (PCB) Congeners

PCB 105	PCB 114
PCB 118	PCB 123
PCB 126	PCB 156/157
PCB 157	PCB 167
PCB 169	PCB 170
PCB 189	PCB 193/180
PCB 77	PCB 81

Pesticides

4,4'-DDD (1,1-bis(4-chlorophenyl)-2,2-dichloroethane)	4,4'-DDE (2,2-bis(p-chlorophenyl)-1,1-dichloroethylene)
4,4'-DDT (1,1-bis(4-chlorophenyl)-2,2,2-trichloroethane)	Aldrin

a-BHC	b-BHC
d-BHC	g-BHC
BHC	Chlordane
Dieldrin	Endosulfan
Endosulfan I	Endosulfan II
Endosulfan sulfate	Endrin
Endrin aldehyde	Endrin ketone
Heptachlor	Heptachlor epoxide
Methoxychlor	a-Chlordane
g-Chlordane	Toxaphene

Semivolatile Organic Compounds (SVOCs)

1,1'-Biphenyl	Benzo(b)Fluoranthene
1,2,4-Trichlorobenzene	Benzo(g,h,i)perylene
1,2-Dichlorobenzene	Benzo(k)Fluoranthene
1,3-Dichlorobenzene	Benzoic acid
1,4-Dichlorobenzene	Benzyl alcohol X (lab use)
2,2'-Oxybis(1-Chloropropane)	Bis(2-chloroethoxy) methane
2,4,5-Trichlorophenol	Bis(2-chloroethyl) ether
2,4,6-Trichlorophenol	Bis(2-chloroisopropyl) ether
2,4-Dichlorophenol	Bis(2-ethylhexyl) phthalate
2,4-Dimethylphenol	Butyl benzyl phthalate
2,4-Dinitrophenol	Caprolactam
2,6-Dinitrotoluene	Carbazole
2-Chloronaphthalene	Chrysene
2-Chlorophenol	Cresol
2-Methylnaphthalene	Dibenz(a,h) anthracene
2-Methylphenol	Dibenzofuran

2-Nitroaniline	Diethyl phthalate
2-Nitrophenol	Dimethyl phthalate
3,3'-Dichlorobenzidine	Di-n-butyl phthalate
3-Nitroaniline	Di-n-octyl phthalate X (Lab use)
4,6-Dinitro-2-methylphenol	Fluoranthene
4-Bromophenyl phenyl ether	Fluorene
4-Chloro-3-Methylphenol	Hexachlorobenzene
4-Chloroaniline	Hexachlorocyclopentadiene
4-Chlorophenyl phenyl ether	Hexachloroethane
4-Methylphenol	Indeno(1,2,3-cd)pyrene
4-Nitroaniline	Isophorone
4-Nitrophenol	Naphthalene
Acenaphthene	Nitrobenzene
Acenaphthylene	N-Nitrosodi-n-propylamine
Acetophenone	N-Nitrosodiphenylamine
Aniline	p-Chlorotoluene
Anthracene	Pentachlorophenol
Atrazine	Phenanthrene
Benzo(a)Anthracene	Phenol
Benzo(a)Pyrene	Pyrene

Volatile Organic Compounds (VOCs)

1,1,1-Trichloroethane	X	Chloroform	X (Lab use)
1,1,2,2-Tetrachloroethane	X	Chloromethane	
1,1,2-Trichloro-1,2,2-trifluoroethane		cis-1,2-Dichloroethene	
1,1,2-Trichloroethane		cis-1,3-Dichloropropene	
1,1-Dichloroethane		Cyclohexane	

1,1-Dichloroethene		dibromochloromethane
1,2,3-trichlorobenzene		Dibromomethane
1,2,4-Trichlorobenzene		Dichlorodifluoromethane
1,2,4-Trimethylbenzene		ethanol X
1,2-Dibromo-3-chloropropane		Ethyl ether X (Lab use)
1,2-dibromoethane		Ethyl methacrylate
1,2-Dichlorobenzene		Ethylbenzene
1,2-Dichloroethane		Ethylenedibromide
1,2-Dichloroethene (total)		Fluorotrichloromethane
1,2-Dichloropropane		freon-114 X (HVAC)
1,3,5-Trimethylbenzene		freon-12 X (HVAC)
1,3-Dichlorobenzene		halothane
1,3-Dichloropropane		Hexachlorobutadiene
1,4-Dichlorobenzene		Iodomethane
1,4-Dichlorobutane		isopropyl alcohol X
2,2-Dichloropropane		Isopropylbenzene
2-Butanone (MEK)	X (Lab use)	Methyl acetate
2-Chloroethyl vinyl ether		Methyl cyclohexane
2-Chlorophenol		methyl isobutyl ketone (MIBK) X (Lab use)
2-Hexanone		Methyl tert-butyl ether
4-bromofluorobenzene		Methylene chloride X (Lab use)
4-chlorotoluene		Naphthalene
4-Methyl-2-pentanone		n-Butylbenzene
Acetone	X	n-Propylbenzene
acetonitrile		o-Chlorotoluene
Acrolein		p-Isopropyltoluene
Acrylonitrile	X (Lab use)	sec-Butylbenzene
Benzaldehyde		Styrene
Benzene		tert-Butylbenzene

Bromobenzene		Tetrachloroethene	X
Bromochloromethane		Toluene	X (Lab use)
Bromodichloromethane		trans-1,2-Dichloroethene	
Bromoform		trans-1,3-Dichloropropene	
Bromomethane		trans-1,4-Dichloro-2-butene	
Carbon disulfide	X (Lab use)	Trichloroethene	X
Carbon tetrachloride	X (Lab use)	Vinyl Acetate	
Chlorobenzene		Vinyl chloride	
Chlorodibromomethane		Xylenes (total)	
Chloroethane			