CRYOVAC DIVISION | W.R. GRACE & CO. | 369 WASHINGTON STREET
WOBURN, MASSACHUSETTS 01888 617-933-7500

February 5, 1982

Director, Enforcement Division
U. S. Environmental Protection Agency
John F. Kennedy Federal Building
Room 2103
Boston, Massachusetts 02203

Attention: RCRA Compliance Clerk

Re: U.S. EPA Letter dated January 15, 1982 - Request for Information pursuant to Section 3007 of the Resource Conservation and Recovery Act, 42 U.S.C. Section 6927.

Dear Sir:

This is in response to the referenced letter requesting information concerning certain activities which occurred at our plant site, viz., 369 Washington Street, Woburn, Massachusetts, at the time when the latest addition to our plant was constructed in 1974. It is our understanding that you have also communicated with Donald M. Manzelli, Inc. who was involved in the construction at the time.

We appreciate EPA's grant of extension of time to answer as set forth in Attorney Rikleen's letter of January 25, 1982. We are providing this response in a spirit of cooperation, with the understanding that you are at present gathering information from many sources as to the potential causes of contamination of two wells in East Woburn and that our company has not been singled out as the target of any investigation at this time.

The Woburn plant of the Cryovac Division of W. R. Grace & Co. (Cryovac) is and, since its initial construction in 1960, has been engaged in metal fabrication of packaging equipment for the food industry. Most of the fabrication involves use of stainless steel to meet the rigid health and safety specifications of this industry. Exhibit A sets forth a basic description of the physical plant dimensions and construction history.

In the course of its manufacturing activities Cryovac has utilized a limited amount of chlorinated solvents which are associated with a small parts painting operation at the site or with parts cleaning and the gluing/laminating of small parts as well as cutting fluids of the type customarily utilized in machine shops. These solvents and cutting fluids which are undoubtedly similar to those utilized by other manufacturing activities in the area and elsewhere have been used in small quantities over time as follows:

Trichloroethylene

One drum (55 gallons) purchased in 1973. Material used for hand cleaning of small metal parts. Total amount used up by 1975. Use discontinued after single initial order.

Toluene

Purchased in limited quantities, 5-gallon pails, and used as paint thinner to clean paint spray equipment. Use discontinued in 1975.

Acetone

One 5-gallon pail purchased in 1978. Used for wiping parts prior to gluing/laminating.

1,1,1-Trichloroethane

This material is a constituent of cutting fluids used in the machine shop. Cutting fluids are used in metal cutting equipment for cooling and removing particles.

Of the above mentioned materials, only 1,1,1-trichloroethane is still in use and approximately 2 gallons of acetone remains of the 5-gallon pail purchased in 1978. The 1,1,1-trichloroethane is received in 55-gallon drums. The average inventory of such material on hand at any one time has historically been four or five drums. As received from the supplier, the material is a solution containing approximately 33% 1,1,1-trichloroethane. This solution is further reduced with water by a ratio of 40-50 to one for use in machine tools. Spent cutting fluid is accumulated in 55-gallon drums for disposal, as are paint sludge and related paint equipment cleaning material from the spray booth operations used to paint small equipment parts, all of which we generally categorize as "paint sludge."

The paint sludge is generated incident to the painting of certain parts of some of the equipment we manufacture. Painting is done in a spray booth with a water wash wall, an equipment design which captures fugutive paint spray to prevent its emission to either the plant atmosphere or outside the plant. The water wash is a closed loop system which recirculates water for long periods of time. The paint dries in the sump of the system which is periodically cleaned of the paint accumulation.

When the RCRA regulations came into effect, Cryovac registered as a generator of materials subject to the Act and is in full compliance with disposal requirements applicable to said materials. The waste is manifested as required and a certified transporter and disposer of waste has been engaged.

At no time have there been above ground or underground storage tanks on the site, nor is there any septic system at the site.

With respect to our relationship with Donald M. Manzelli, Inc., our information is that in the summer of 1974 Manzelli was hired in connection with the construction of an addition to our plant. Incident to the construction, a pit was dug and used to bury construction debris as part of a general cleanup. As part of the cleanup activity we estimate that between 10-15 filled or partially filled drums of accumulated paint sludge were emptied into the pit in the belief that the paint sludge was generally innocuous in nature. No drums were placed in the pit which was closed within a week after it had been opened. This incident was the only time in which a pit was opened on the property for waste disposal. The location of the closed pit is estimated to be approximately 100 feet behind (east of) the plant building, approximately 200-300 feet from the north and south boundaries of the property, and some 500 feet from the east boundary of the property. There are no wells on the property.

The water used at the plant is supplied by Woburn's municipal water system. We have had this water analyzed and copies of the analysis are attached as Exhibits B and C.

We hope this response is helpful to you and is based on our best recollection at this time.

Cryovac is sensitive to the water problem which Woburn has been experiencing and to the health concerns which have been raised as well.

We are ready to cooperate with you in any reasonable way and hereby extend an invitation for EPA representatives to visit the plant at any mutually convenient time so that EPA may view our operations as well as the site where the pit was dug.

Very truly yours,

V. A. Forte
General Manager
Woburn Plant

Attachments

CC/ Lauren Stiller Rikleen, Esq.
O. Mario Favorito, Esq.

ATTACHMENT "A" - SUBJECT PLANT

1. Woburn Plant
Cryovac Division, W. R. Grace & Co.
369 Washington Street
Woburn, Massachusetts

Middlesex County

	Sq. Ft.
2. Date of initial construction 1960-1961	49,000
Expansion - 1966	22,000
Expansion - 1969	12,000
Expansion - 1974	14,200
12.6 acres ---------- present square feet	97,200

3. Administration	13,500
Warehouse	12,000
Manufacturing	71,700
	97,200

4. SIC 3551

Metal fabrication plant engaged in the design and fabrication of (primari) packaging machinery primarily for the food packaging industry.

RKS
1/29/82

Testing Laboratories
Incorporated
East Natick Industrial Park
6 Huron Drive • Natick, MA 01760
(617) 235-7330, 653-5950
Telex 948459 GREENELAB NTIK

Research • Deve

Branch Laboratories:
Springfield, Mass. 01104
(413) 734-6548

Auburn, Mass. 01501
(617) 832-5500

ATTACHMENT B

TEST REPORT

TO: Cryovac
Div. of W.R. Grace & Co.
369 Washington Street
ATT: Woburn, MA 01801

DATE 11/3/81
JOB NO. 16099-1
LAB. NO.
ORDER NO.

MATERIAL Water
HEAT NO.
SPECIFICATIONS:

Problem: To analyze a water sample for Volatile Organic Contaminants in a well water sample.

Sample: Domestic drinking water 10/21/81.

Method: The sample was analyzed for Volatile Organic Contaminants by Gas Chromatographic/ Mass Spectometeric Technique. The [illegible] was equipped with a purge and trap concentrator for the analysis.

Results: There were no volatile organic contaminants found at levels greater than our detection limit of 5 ppb. The list of volatile organic contaminants scanned for in the analysis is included with thenreport.

SUBSCRIBED TO AND SWORN TO BEFORE ME THIS
DAY OF 19

NOTARY PUBLIC

IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND THIS
3rd DAY OF November
ARNOLD GREENE TESTING LABORATORIES, INC.
James J. Dari[illegible]

Incorporated
East Natick Industrial Park
6 Huron Drive • Natick, MA 01760
(617) 235-7330, 653-5950
Telex 948459 GREENELAB NTIK

Branch Laboratories:
Springfield, Mass. 01104
(413) 734-6548

Auburn, Mass. 01501
(617) 832-5500

TEST REPORT

TO: Cryovac
Div of W.R. Grace & Co
369 Washington Street
Woburn, MA 01801

ATT:

DATE 11/3/81
JOB NO. 16099-1
LAB. NO.
ORDER NO. Verbal

MATERIAL
HEAT NO.
SPECIFICATIONS:

Sample: Drinking Water W.R. Grace October 23, 1981

Odor	3 OII	Nitrate (N)	0.15 mg/l
Color	14 PCCU	Nitrite (N)	0.03 mg/l
Turbidity	8.6 NTU	Total Dissolved Solids	57 mg/l
Chloride	23.2mg/l	Total Coliform Bacteria	0/100 ml MPN
pH	6.9	Iron	0.06 mg/l
Total Alkalinty ($CaCO_3$)	20.0mg/l	Manganese	0.06 mg/l
Total Hardenss ($CaCO_3$)	24.9mg/l	Sodium	12 mg/l
Ammoni (N)	0.18 mg/l		

Comment: The water analyzed does not meet the specification for Odor, color, and Turbidity.

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3rd DAY OF November 81 19
ARNOLD GREENE TESTING LABORATORIES, INC.

Michael Davis

Arnold Greene
Testing Laboratories
Incorporated

PRIORITY POLLUTANTS

VOLATILE ORGANIC CONTAMINANTS

Compound:	Compound:
methylene chloride	trans-1,3-dichloropropene
trichlorofluoromethane	trichloroethylene
1,1-dichloroethylene	dibromochloromethane
1,1-dichloroethane	cis-1,3-dichloropropane
trans-1,2-dichloroethylene	1,1,2-trichloroethane
chloroform	benzene
1,2-dichloroethane	2-chloroethylvinyl ether
1,1,1-trichloroethane	bromoform
carbon tetrachloride	1,1,2,2-tetrachloroethane
bromodichloromethane	1,1,2,2-tetrachloroethane
bis-chloromethyl ether	toluene
1,2-dichloropropane	chlorobenzene
dichlorodifluoromethane	ethylbenzene

ATTACHMENT C

WATER ANALYSIS REPORT

Culligan

WATER CONDITIONING CO.
39 Chelmsford Street, Lowell, MA. 01851
Tel. (617) 454-8896 Boston Area 259-8500

To Mr. Ulf Nordin
C/O Cryovac
369 Washington Street
Woburn, Mass. 01888

PO# 82398
Date November 20, 1981
Analysis No. #3875
Consumer Residential
Source Municipal
Sampling point
Sample represents Untreated Water

Sample taken	Sample rec'd
11/13/81	11/16/81

Turbidity			NTU	Calcium (Ca)			mg/l
				Magnesium (Mg)			mg/l
Color	None as received			Sodium (Na)			mg/l
Odor	None as received						
Total Hardness*	1.0		gpg				
pH	7.3			Chloride (Cl)			mg/l
Iron (Fe)	0.1		mg/l	Sulfate (SO_4)			mg/l
				Nitrate (NO_3)			mg/l
				Hydroxide Alk.*			mg/l
				Carbonate Alk.*			mg/l
				Bicarb. Alk.*			
TDS	75		mg/l	Conductivity			umhos/cm

* Expressed as Calcium Carbonate ($CaCO_3$)

Thomas Cavicchi
Chemist

Remarks:

This water contains only a slight amount of mineral contamination. Activated carbon filtration will do an excellent job to improve taste and eliminate odors.