

US EPA ARCHIVE DOCUMENT

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File No. 031529-0010

ATHAM & WATKINS LLP

March 18, 2004

VIA FEDEX

Mary Jane O'Donnell
Office of Site Remediation and Restoration
U.S. Environmental Protection Agency
1 Congress Street (HBT)
Boston, MA 02114-2023

Re: Stepan Company – Request for Information Pursuant to Section 104 of CERCLA in relation to the former Whitney Barrel Company at the Wells G & H Superfund Site in Woburn, Massachusetts

Dear Mary Jane:

Enclosed please find Stepan Company's response to the above referenced request for information. As confirmed in my letter to you dated February 12, 2004, EPA agreed to an extension until March 19, 2004 for Stepan Company to provide this response. Thank you for your cooperation, and please contact me or Carol Bynoe at Stepan Company (contact information in enclosed response) if you have any questions.

Best regards,



David H. Becker
of LATHAM & WATKINS LLP

Enclosures

cc: C. Bynoe, Stepan Company (via FedEx)

US EPA ARCHIVE DOCUMENT

WELLS G & H SUPERFUND SITE
WOBURN, MASSACHUSETTS
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.

**Stepan Company
22 West Frontage Road
Northfield, Illinois 60093**

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.

**Carol A. Bynoe, Esq.
Senior Attorney
Stepan Company
22 West Frontage Road
Northfield, Illinois 60093
(847) 501-2244**

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.

The Legal Contact for Stepan Company ("Stepan") for this matter is:

**Carol A. Bynoe, Esq.
Senior Attorney
Stepan Company
22 West Frontage Road
Northfield, Illinois 60093
(847) 501-2244**

d. Provide the names of all Superfund sites in Region I (New England) for which Respondent has received a 104(e) Request for Information Letter from EPA.

Stepan has information indicating it received or may have received 104(e) Request for Information Letters from EPA for the following Region I Superfund sites:

**Charles-George Reclamation Landfill (Tyngsborough, MA)
Iron Horse Park (Billerica, MA)**

2. Respondent's Legal Status

NOTE: All questions in this section refer to the present time unless otherwise indicated.

- a. If the Respondent has ever done business under any other name;
- i. list each such name; and
 - ii. list the dates during which such name was used by Respondent.

Stepan Company (an Illinois corporation) from 1932 until February 19, 1959.

Stepan Chemical Company (a Delaware corporation) from February 19, 1959 until December 31, 1983, on which date Respondent's name changed to Stepan Company.

- b. If Respondent is a corporation, provide:
- i. the date of incorporation;
 - ii. state of incorporation;
 - iii. agent for service of process

Stepan Company was incorporated in the State of Delaware on February 19, 1959.

Agent for service of process is:

**Corporation Trust Company
1209 Orange Street
Wilmington, DE 19801**

- c. If Respondent was a business entity other than a corporation, provide:
- i. the type of organization (sole proprietorship, partnership, trust, etc.)
 - ii. the date the business began; and
 - iii. owner, managing partner, or other equivalent person in charge.

N/A

d. If Respondent is, or was at any time during the period being investigated, a subsidiary of, otherwise owned or controlled by, or otherwise affiliated with another corporation or entity, then describe the nature of each such corporate relationship, including but not limited to:

- i. a general statement of the nature of the relationship;
- ii. the dates such relationship existed;
- iii. the percentage of ownership of Respondent that is held by such other entity; and
- iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities.

See Attachment 1 for a list of Stepan affiliates.

Stepan Canada, Inc., Stepan Mexico, S.A. de C.V., Stepan Europe, Stepan Colombiana de Quimicos S.A., and Stepan Quimica Ltda. are 100% owned subsidiaries of Stepan Company.

Stepan Deutchland GmbH and Stepan UK Ltd. are 100% owned subsidiaries of Stepan Europe.

Stepan Philippines, Inc. (J.V.) is a 50% owned subsidiary of Stepan Company.

Nanjing Stepan Jinling Chemical Limited Liability (J.V.) is a 55% owned subsidiary of Stepan Company.

e. Identify all of Respondent's predecessors-in-interest and provide a description of the relationship between Respondent and each of those predecessors-in-interest.

N/A

f. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:

- i. the titles and dates of the transactions and copies of documents that embody the terms of such transactions (i.e., purchase agreements, merger and dissolution agreements, etc.);
- ii. the identities of the seller, buyer, and any other parties to such transactions;
- iii. a brief statement describing the nature of the asset purchases or mergers; and
- iv. a brief statement describing and copy(s) of documents embodying any/all indemnification agreements.

N/A

g. If Respondent has filed for bankruptcy, provide:

- i. the U.S. Bankruptcy Court in which the petition was filed;
- ii. the docket numbers of such petition
- iii. the date the bankruptcy petition was filed;
- iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
- v. a brief description of the current status of the petition.

N/A

3. Respondent's Operations

NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.

ALSO NOTE: All questions in this Section refer to facilities owned or operated by the Respondent within Massachusetts, Rhode Island, New Hampshire or Maine and to any other facility owned or operated by Respondent which had any business or other contractual relationship with Whitney Barrel Company. **Please note that it is not necessary to identify or provide information about any facilities that are engaged solely in clerical/office work.**

a. Provide the complete addresses of Respondent's plants and other buildings or structures where Respondent carried out its operations.

From 1968 until 1980, Stepan owned and operated a plant at 51 Eames Street, Wilmington, MA 01887 ("Wilmington Plant").

Stepan did not own and does not currently own any other plants in Massachusetts, Rhode Island, New Hampshire and Maine.

- b. Provide a brief description of the nature of Respondent's operations at each location including:
- i. the date such operations commenced and concluded;
 - ii. the types of work performed at each location, including but not limited to the industrial, chemical, or institutional processes undertaken at each location; and
 - iii. the type of products manufactured, recycled, recovered, treated or otherwise processed in these operations.

On December 20, 2002, counsel for Stepan submitted a response to a Request for Information from the Massachusetts Department of Environmental Protection, which is enclosed ("MADEP Response"). Attached as Tabs to the MADEP Response are the available records related to the Wilmington Plant that are responsive to this Request for Information. Citation to the documents at the Tabs attached to the MADEP Response are made below, where appropriate.

Stepan purchased the Wilmington Plant from Fissons Corporation in 1968. Stepan sold the Wilmington Plant to Olin Corporation in 1980. The plant produced chemical additives for rubber and plastics processing. For additional detail, please see documents attached at Tabs 1, 2, 3, 4, 6, 9 & 10 of the MADEP Response.

Please Note: As described in the document attached at Tab 10 of the MADEP Response, the business records pertaining to the Wilmington Plant were left at the premises when Stepan sold the Plant to Olin Corporation in 1980.

- c. Enclosure F provides a list of chemical constituents conclusively identified to date at the Site. For each facility identified in 3.a above, identify, to the best of your knowledge, any chemical constituents listed in Enclosure F that:
- i. would have been produced, processed, or used in connection with facility operations; or
 - ii. would have been present in materials produced, processed, or used in connection with facility operations.

Please see documents at Tabs 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14 & 15 of the MADEP Response.

d. If the nature or size of Respondent's operations changed over time, describe those changes, the dates they occurred, and the nature of the current business at each such location, including but not limited to a brief description of the major products or services Respondent manufactures or provides.

To the best of its knowledge, based on its review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question. Stepan does not own or operate the current business at the site of the Wilmington Plant.

e. List the products Respondent manufactured, recycled, recovered, treated, or otherwise processed in these operations.

Please see documents at Tabs 1, 2, 3, 6, 9 & 10 of the MADEP Response.

f. In general terms, list the types of raw materials used in the operations.

Please see documents at Tabs 1, 2, 3, 4, 6, 9 & 10 of the MADEP Response.

g. Describe the cleaning and maintenance of the equipment and machinery involved in these operations, including but not limited to:

- i. the types of material used to clean/maintain this equipment/machinery; and
- ii. the monthly or annual quantity of each material used.

To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

h. Describe the methods used to clean up spills of liquid or solid material during operations, including but not limited to:

- i. the type of materials spilled in operations;
- ii. the materials used to clean up these spill
- iii. the methods used to clean up those spills; and
- iv. where the materials used to clean up those spills were disposed of.

To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's

operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

i. Provide a schematic diagram or flow chart that fully describes and/or illustrates the operations at the Site.

To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

j. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had any contact with Whitney Barrel Company.

Except for the former employees listed below in the response to Question 9, to the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

4. Respondent's Wastes and Waste Streams (including By-Products)

NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.

a. Complete the enclosed "Waste Survey " checking each substance present in Respondent's wastes or by-products and providing all requested information for each such substance that is checked.

Please see documents at Tabs 1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14 & 15 of the MADEP Response.

b. For each type of waste (including by-products) from Respondent's operations, including but not limited to all liquids, sludges, and solids, provide the following information:

- i. its physical state,
- ii. its name and chemical composition;
- iii. the approximate monthly and annual volumes of each type of waste (using such measurements as gallons, cubic yards, pounds, etc.); and
- iv. the dates (beginning & ending) during which each type of waste was produced by Respondent's operations.

Please see response to Question 4a.

c. Describe how each type of waste was collected and stored at Respondent's operation prior to disposal/recycling/sale/transport, including:

- i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);
- ii. the colors of the containers;
- iii. any distinctive stripes or other markings on those containers;
- iv. any labels or writing on those containers (including the content of those labels);
- v. whether those containers were new or used;
- vi. where each type of waste was collected/stored. and
- vii. if those containers were used, a description of the prior use of the containers.

Please see response to Question 4a.

d. Identify (see Definitions) the person(s) who was responsible for collecting and managing each type of waste.

To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

e. For each location, identify and provide copies of all surveys or studies conducted between 1950 and 1985 about its waste management practices including but not limited to disposal, treatment, storage, recycling, or sale of wastes.

To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

f. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

Except for the former employees listed below in the response to Question 9, to the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

5. Respondent's Disposal/Treatment/Storage/Recycling/Sale of Waste (including By Products):

NOTE: All questions in this section refer to the period being investigated (1950-1985) unless otherwise indicated.

ALSO NOTE: Your response to questions in this section must refer to all locations to which Respondent sent its wastes.

a. Identify (see Definitions) all individuals who currently have and those who have had responsibility for the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

The individual with current overall responsibility for the disposal, treatment, storage, recycling, or sale of Stepan's wastes is Dave Milner, Director of Environmental Health & Safety. Stepan understands this request to otherwise refer to its operations within Massachusetts, Rhode Island, New Hampshire, and Maine for the period being investigated, which is limited to the Wilmington Plant between 1968 and 1980. To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any other information responsive to this question.

b. Identify (see Definitions) all individuals who currently have and those who have had knowledge of the disposal, treatment, storage, recycling, or sale of Respondent's wastes, including, but not limited to barrels or empty barrels.

Please see response to Question 5a.

c. Identify (see Definitions) all individuals who currently have and those who have had responsibility for Respondent's environmental matters.

Please see response to Question 5a.

d. 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 Respondent, the date of the individual's resignation; and
- vi. the nature of the information possessed by such individuals concerning Respondent's waste management.

Please see response to Question 5a.

e. Describe the containers used to take each type of waste from Respondent's operation, including but not limited to:

- i. the type of container (e.g. 55 gal. drum, tank, dumpster, etc.);
- ii. the colors of the containers;
- iii. any distinctive stripes or other markings on those containers;
- iv. any labels or writing on those containers (including the content of those labels);
- v. whether those containers were new or used; and
- vi. if those containers were used, a description of the prior use of the containers.

To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

f. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.

Please see documents at Tabs 5, 7, 8, 9, 10, 11, 12, 13, 14 & 15 of the MADEP Response. To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any other information responsive to this question.

g. Provide copies of such contracts and other documents reflecting such agreements or arrangements.

To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

h. State where Respondent sent each type of its waste, including barrels and empty barrels, for disposal, treatment, or recycling.

Please see documents at Tabs 5, 7, 8, 9, 10, 11, 12, 13, 14 & 15 of the MADEP Response.

i. Identify (see Definitions) all entities and individuals who picked up waste, including barrels, from Respondent or who otherwise transported the waste away from Respondent's operations (these companies and individuals shall be called "Waste Carriers" for purposes of this Information Request).

Please see documents at Tabs 5, 8, 9, 10, 11, 12, 13, & 15 of the MADEP Response for information responsive to Questions i through u.

j. If Respondent transported any of its wastes away from its operations, please so indicate and answer all questions related to "Waste Carriers" with reference to Respondent's actions.

k. For each type of waste specify which Waste Carrier picked it up.

l. For each type of waste, state how frequently each Waste Carrier picked up such waste.

m. For each type of waste state the volume picked up by each Waste Carrier (per week, month, or year).

n. For each type of waste state the dates (beginning & ending) such waste was picked up by each Waste Carrier.

o. Provide copies of all documents containing information responsive to the previous seven questions.

p. Identify (see Definitions) all of each Waste Carrier's employees who collected Respondent's wastes and waste containers.

q. Indicate the ultimate disposal/recycling/treatment location for each type of waste.

r. Provide copies of all documents indicating the ultimate disposal/recycling/treatment location for each type of waste.

s. Describe how Respondent managed pickups of each waste, including but not limited to:

- i. the method for inventorying each type of waste;
- ii. the method for requesting each type of waste to be picked up;
- iii. the identity of (see Definitions) the waste carrier employee/agent contacted for pickup of each type of waste;
- iv. the amount paid or the rate paid for the pickup of each type of waste;
- v. the identity of (see Definitions) Respondent's employee who paid the bills; and
- vi. the identity of (see Definitions) the individual (name or title) and company to whom Respondent sent the payment for pickup of each type of waste.

t. Identify (see Definitions) the individual or organization (i.e., the Respondent, the Waste Carrier, or, if neither, identify such other person) who selected the location where each of the Respondent's wastes were taken.

u. State the basis for and provide any documents supporting the answer to the previous question.

v. Identify all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions.

Except for the former employees listed below in the response to Question 9, to the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

6. Respondent's Environmental Reporting:

NOTE: All questions in this section refer to the period being investigated (1950-1985).

a. Provide all Resource Conservation and Recovery Act (RCRA) Identification Numbers issued to Respondent by EPA or a state for Respondent's operations.

To the best of Stepan's knowledge, the RCRA Generator Identification Number for the Wilmington Plant was MAD001403104.

b. Identify (see Definitions) all federal offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

United States Environmental Protection Agency, Region I

c. State the years during which such information was sent/filed.

1989 – please see documents at Tabs 9 & 10 of the MADEP Response

d. Identify (see Definitions) all state offices to which Respondent has sent or filed hazardous substance or hazardous waste information.

**Commonwealth of Massachusetts, Div. of Water Pollution Control
Commonwealth of Massachusetts, Dept. of Environmental Quality
Engineering
Massachusetts Department of Environmental Protection**

e. State the years during which such information was sent/filed.

1979 – please see document at Tab 4 of the MADEP Response
1971 – please see document at Tab 5 of the MADEP Response
1970 – please see document at Tab 7 of the MADEP Response
1981 – please see document at Tab 12 of the MADEP Response
2002 – please see MADEP Response

Other than the information listed, to the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

f. List all federal and state environmental laws and regulations under which Respondent has reported to federal or state governments, including but not limited to: Toxic Substances Control Act, 15 U.S.C. §§ 2601 et s., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. §§ 1101 et s., (EPCRA); and the Clean Water Act (the Water Pollution Prevention and Control Act), 33 U.S.C. §§ 1251 et seq. and equivalent state law.

Other than the information listed in response to other questions in this section, to the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

g. Identify (see Definitions) the federal and state offices to which such information was sent. Provide the full legal name and mailing address of the Respondent.

N/A – please see response to Question 6f.

7. Information Concerning Respondent's Association with the Whitney Barrel Company

NOTE: All questions in this section refer to the period being investigated (1950-1985).

a. Please describe Respondent's business association with the Whitney Barrel Company.

Based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at its Wilmington Plant during the relevant time period, Stepan has not identified any information that it was associated with the Whitney Barrel Company. As noted above and in the document attached at Tab 10 of the MADEP Response, the business records pertaining to the Wilmington

Plant were left at the premises when Stepan sold the Plant to Olin Corporation in 1980.

b. Did your association with the Whitney Barrel Company involve the buying of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit your response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s);
- v. the condition of each container(s);
- v. the contents (including but not limited to empty barrel residues) of each container including
 - (a) the name of each material;
 - (b) the chemical composition of each material;
 - (c) the physical state of each material (e.g., solid, sludge, liquid);
 - (d) the volume of each material; and
- vi. please include all documentation relating to these transactions.

N/A - please see response to Question 7a.

c. Did your association with the Whitney Barrel Company involve the shipping, transport or selling of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s);
- iv. the condition of each container(s)
- v. the contents (including but not limited empty barrel residues) of each container including
 - (a) the name of each material;
 - (b) the chemical composition of each material;
 - (c) the physical state of each material (e.g., solid, sludge, liquid);
 - (d) the volume of each material; and
- vi. please include all documentation relating to these transactions.

N/A - please see response to Question 7a.

d. Did your association with the Whitney Barrel Company involve the cleaning and/or reconditioning of drums or other size/type of containers? Unless your answer is an absolute "No", please explain. Include but do not limit response to:

- i. the dates of each pickup and delivery;
- ii. the type(s) of container(s);
- iii. the size(s) of the container(s);
- iv. the condition of each container(s)
- v. the contents (including but not limited to empty barrel residues) of each container including
 - (a) the name of each material;

- (b) the chemical composition of each material;
- (c) the physical state of each material (e.g., solid, sludge, liquid);
- (d) the volume of each material; and
- vi. please include all documentation relating to these transactions.

N/A - please see response to Question 7a.

e. Did the Whitney Barrel Company ever perform any other service for you or your company? Unless an absolute "No", please explain. Include but do not limit your response to:

- i. the type of service(s);
- ii. the frequency of the service(s);
- iii. the date(s) of service(s); and
- iv. please include any documentation relating to these transactions.

N/A - please see response to Question 7a.

f. Did Respondent ever pick up materials from other parties which were taken directly or indirectly to the Whitney Barrel Company (to be referred to as "customers" for purposes of this Information Request)? Unless your answer is an absolute "No", please explain.

N/A - please see response to Question 7a.

g. Identify (see Definitions) all persons and entities from whom Respondent picked up materials which were taken directly or indirectly to the Whitney Barrel Company.

N/A - please see response to Question 7a.

h. In addition to providing a list that identifies all such customers, provide for each pickup and delivery of materials to the Whitney Barrel Company:

- i. the dates of each pickup and delivery;
- ii. the type of container(s);
- iii. the size of the container(s);
- iv. the condition of each container(s);
- v. for each customer's materials taken to the Whitney Barrel Company describe:
 - (a) the nature of each material;
 - (b) the chemical composition of each material;
 - (c) the physical state of each material(e.g.,solid, liquid);
 - (d) the volume of each material; and
- vi. please include all documentation relating to your pickup and delivery of materials to the Whitney Barrel Company

N/A - please see response to Question 7a.

i. Identify (see Definitions) all former or current employees and all other persons who have any knowledge of or information about the subject matter of any of the foregoing questions or who had contact with Whitney Barrel Company.

N/A - please see response to Question 7a.

8. Information About Others

a. If you have information concerning the operation of the Site or the source, content or quantity of materials placed/disposed at the Site which is not included in the information you have already provided, provide all such information.

To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at the Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

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.

To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at the Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question. It is possible that records for the Wilmington Plant for the period being investigated are still maintained at the site of the Plant under the control of the current owner.

c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

To the best of its knowledge, based on a review of documents where such information would be expected to be found if it existed, and based on consultation with individuals with knowledge of Stepan's operations at the Wilmington Plant during the relevant time period, Stepan has not identified any information responsive to this question.

9. 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.

Stepan's efforts in responding to this information request included, but was not limited to, review of the MADEP Response; review of documents kept in the Stepan corporate archives in Northfield, Illinois; and review of documents related to past litigation involving the Wilmington Plant, kept at the law firm of Goulston & Storrs in Boston, Massachusetts. In addition, the following former or current employees were consulted regarding their knowledge of information responsive to this information request:

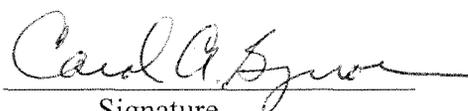
Dr. James Hartledge, former Senior Vice President, Technology & Operations (retired)
Charles P. Riley, Jr., former Wilmington Plant Manager (retired)
Paul Cunha, former Wilmington Plant Process Engineer (retired)
Dave Milner, Director, Environmental Health & Safety, Northfield, Illinois
Gary Traverso, Plant Manager, Millsdale Plant, Elwood, Illinois
Mike Williams, Environmental Health & Safety Manager, Winder, Georgia
Dennis Pratt, Safety Manager, Fieldsboro Plant, Bordentown, New Jersey
Belen Fernandez, Safety Manager, Anaheim, California
Tom Szczeblowski, Plant Manager, Anaheim, California
Larry Whited, Plant Manager, Fieldsboro Plant, Bordentown, New Jersey
Tony Zoglio, Vice President of Manufacturing, Northfield, Illinois
Don Watson, Plant Manager, Maywood, New Jersey
Ed Hyer, Plant Manager, Winder, Georgia
Dan Munro, Environmental Health & Safety Manager, Northfield, Illinois
Steve Geydoshek, Safety Manager, Maywood, New Jersey
Roberta Mauser, Safety Manager, Millsdale Plant, Ellwood, Illinois
Scott Nelson, Environmental Health & Safety Manager, Northfield, Illinois
Dan Callahan, Environmental Health & Safety Manager, Fieldsboro Plant & Maywood, New Jersey

WELLS G & H

ENCLOSURE H - DECLARATION

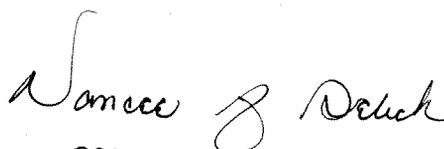
I declare under penalty of perjury that I am authorized to respond on behalf of Stepan Company (Respondent) and that the foregoing is complete, true, and correct.

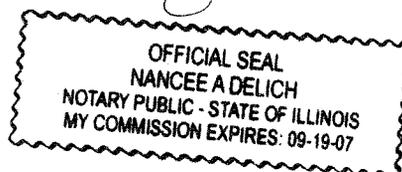
Executed on MARCH 16, 2004


Signature

Carol A. Bynoe, Esq.

Senior Attorney







LATSHA DAVIS YOHE
& MCKENNA, P.C.

ATTORNEYS AT LAW

PLEASE REPLY TO: Exton
WRITER'S E-MAIL: Kmckenna@ldylaw.com

December 19, 2005

Via Facsimile and First Class Mail

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

**Re: Stepan Company
Wells G&H Superfund Site, Woburn MA
Our File No. 924-05**

Dear Ms. Bosworth:

Enclosed please find Stepan Company's response to the Supplemental Request for Information pursuant to Section 104 of CERCLA. As confirmed in my letter to you dated November 16, 2005, EPA agreed to an extension until December 21, 2005 for Stepan Company to submit its response.

Thank you for your cooperation and courtesy in this matter. Please feel free to contact me or Carol Bynoe at Stepan Company if you have any questions.

Sincerely,

Kevin M. McKenna

KMM/stw

Enclosure

cc: Carol A. Bynoe, Esquire (via Electronic and First Class Mail)

350 Eagleview Boulevard, Suite 100 • Exton, PA 19341 • (610) 524-8454 • FAX (610) 524-9383

1700 Bent Creek Boulevard, Suite 140 • Mechanicsburg, PA 17050 • (717) 620-2424 • FAX (717) 620-2444

3000 Atrium Way, Suite 251 • Mt. Laurel, NJ 08054 • (856) 231-5351 • FAX (856) 231-5341

Maryland Telephone: (410) 727-2810

0059-0184

US EPA ARCHIVE DOCUMENT

**WELLS G&H Superfund Site
Response of Stepan Company to Supplemental 104(e) Questionnaire**

Information Concerning Olin's Waste Disposal and Facility Closure Activities

1. In your 104 (e) response you stated that Olin disposed of 193 barrels of material between 1981 and 1982 which were left at the Wilmington facility by the prior owner. Please identify all of the waste carriers, companies and/or facilities used to dispose of these barrels.

Stepan Company's 104(e) response dated March 18, 2004 did not include a statement that "Olin disposed of 193 barrels of material between 1981 and 1982 which were left at the Wilmington facility by the prior owner."

Stepan Company ("Stepan") is a separate and distinct company from Olin Corporation ("Olin"); the only relationship between these two companies arises out of the 1980 sale by Stepan to Olin of the plant located at 51 Eames Street, Wilmington, MA 01887 ("Wilmington Plant"). Based on this fact and the fact that Stepan has not been provided a copy of Olin's initial 104(e) responses, Stepan has no information responsive to this question.

2. For each company, please provide:
 - a. The dates of each pickup and delivery;
 - b. The number of containers;
 - c. The type(s) of container(s);
 - d. The size(s) of containers;
 - e. The condition of each container;
 - f. The original and any subsequently added contents (i.e. bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to empty barrel residues, of each container including:
 - i. The name of each material;
 - ii. The chemical composition of each material;
 - iii. The physical state of each material (e.g. solid, sludge, liquid);
 - iv. The volume of each material; and
 - g. All documentation or additional information related to these transactions.

Stepan has no information responsive to this question. See Response to Question 1.

3. According to facility closure plan documents provided with your 104 (e) response, Respondent hired a contractor to provide disposal of four process tanks to a scrap dealer in 1986. According to the agreement between Olin and the Contractor, "all methods of disposal and disposal sites [were] subject to Olin's approval." For each of these tanks, please identify the contractor(s), scrap dealer(s), and disposal location(s) used.

See Response to Question 1. Additionally, Stepan has not been provided copies of the "facility closure plan documents" or the agreement between Olin and the Contractor provided with Olin's 104(e) response. Therefore, Stepan has no information responsive to this question.

Information Concerning Respondent's Association with E.C. Whitney & Son

1. In your 104 (e) response, you provided invoices documenting transactions with E.C. Whitney that reference "empty drums," "triple-rinsed empty drums," "mixed empty drums," "triple wash empty steel drum(s)," and "regular empty steel drums." Please describe the difference between each of these types of drums, including the processes used for each drum type.

Stepan's 104(e) response dated March 18, 2004 did not include invoices documenting transactions with E.C. Whitney, and Stepan has not been provided copies of such invoices provided with Olin's 104(e) response. Therefore, Stepan has no information responsive to this question.

2. In your 104 (e) response you stated that, pursuant to RCRA regulations, all drums were required to be "thoroughly cleaned before being transported off-site." Please describe the procedures you employed to "thoroughly clean" all the drums you sold or otherwise sent/delivered off-site for recycling and/or disposal. Please describe how you disposed of any emptied materials and/or rinse waster from these drums.

Stepan's 104(e) response dated March 18, 2004 did not include a statement that "pursuant to RCRA regulations, all drums were required to be 'thoroughly cleaned before being transported off-site.'" Additionally, Stepan has not been provided with Olin's 104(e) response and therefore, Stepan has no information responsive to this question.

3. Documentation regarding shipment of drums to E.C. Whitney was included in your 104(e) response. For each transaction, please provide:
- The dates of each pickup and delivery;
 - The type(s) of containers;

- c. The size(s) of the containers;
- d. The condition of each container;
- e. The original and any subsequently added contents (i.e. bulk raw material storage, finished product packaging, and/or waste storage), including but not limited to empty barrel residues, of each container including:
 - i. the name of each material;
 - ii. the chemical composition of each material;
 - iii. the physical state of each material (e.g. solid, sludge, liquid);
 - iv. the volume of each material;
- f. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
- g. A description of how Respondent disposed of any emptied materials and/or rinse water; and;
- h. Any documentation or additional information regarding these transactions.

Stepan's 104(e) response dated March 18, 2004 did not include documentation concerning shipment of drums to E.C. Whitney. Additionally, Stepan has not been provided with Olin's 104(e) response and therefore, Stepan has no information responsive to this question.

Information Concerning Respondent's Association with any other Drum Reconditioning and/or Recycling Companies

1. State whether you sent/delivered containers to any other drum reconditioning/recycling company, including but not limited to Kingston Steel Drum/Great Lakes Container Corporation (now known as Mallinckrodt, Inc.), Kingsland Drum Company, Roche Brothers Barrel & Drum Co., Roy Brothers, Inc., Ryan Barrel Company, Inc., and Woburn Barrel.

Stepan did not contract with any of the drum reconditioning/recycling companies referenced in this question.

2. For each company identified above please provide:
 - a. The full name of each company or individual;
 - b. The full address for each company or individual;
 - c. How frequently you sent/delivered tanks to each company;
 - d. The time period during which tanks were sent/delivered;

- e. The original and any subsequently added contents (i.e. bulk raw material storage, finished product packaging and/or waste storage), including but not limited to empty barrel residues, of each container including:
 - i. the name of each material;
 - ii. the chemical composition of each material;
 - iii. the physical state of each material (e.g. solid, sludge, liquid);
 - iv. the volume of each material;
- f. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
- g. A description of how Respondent disposed of any emptied materials and/or rinse water; and;
- h. Any documentation or additional information regarding these transactions.

Stepan has no information responsive to this question.

Compliance with this Request

Note: All questions in this section refer to the present time unless otherwise indicated.

1. Describe all sources reviewed or consulted in responding to this request and all individuals who have any knowledge of, or information about, the subject matter of any of the foregoing questions, including but not limited to:
 - a. The name of each individual;
 - b. The current job title and job description of each individual;
 - c. The job title and job description during the period being investigated of each individual;
 - d. Whether each individual is a current or past employee of Respondent;
 - e. A description of the types of information the individual possesses (i.e., specific information on company operations, wastes generated, and/or waste disposal practices);
 - f. The names of all divisions or offices of Respondent for which records were reviewed;
 - g. The nature of all documents reviewed;
 - h. The locations where those documents reviewed were kept prior to review; and
 - i. The location where those documents reviewed are currently kept.

Stepan's efforts in responding to this information request included, but was not limited to, a review of its March 18, 2004 104(e) response and a review of relevant documents related to the Wilmington plant. Carol Bynoe, Senior Attorney of Stepan, coordinated these efforts.

WELLS G & H

DECLARATION OF STEPAN COMPANY

I declare under penalty of perjury that I am authorized to respond on behalf of Stepan Company (Respondent) and that the foregoing is complete, true and correct.

12-16-05

Date



Carol Bynoe, Senior Attorney
Stepan Company



MCGRATH NORTH MULLIN & KRATZ, PC LLO

ATTORNEYS AT LAW

SUITE 3700 FIRST NATIONAL TOWER
1601 DODGE STREET, OMAHA, NEBRASKA 68102
www.mcgrathnorth.com

JOHN A. ANDREASEN

TELEPHONE: 402-341-3070
E-MAIL: jandreasen@mcgrathnorth.com

February 6, 2007

VIA FEDERAL EXPRESS

Martha Bosworth
Enforcement Coordinator
U.S. Environmental Protection Agency, Region 1
Office of Site Remediation and Restoration (HBS)
1 Congress Street, Suite 1100
Boston, Massachusetts 02114

ATTN: Wells G&H Case Team

Re: Supplemental Request for Information Pursuant to Section 104(e) of CERCLA in
Relation to the Former Whitney Barrel Company at the Wells G&H Superfund
Site in Woburn, Massachusetts

Dear Ms. Bosworth:

Our office represents ConAgra Foods, Inc., a corporate successor of Polyvinyl Chemicals, Inc. This response is being submitted to the above-referenced Supplemental Request for Information dated January 4, 2007 and received by our office on January 9, 2007. Further, this response incorporates previous correspondence and information contained therein from our office to the Agency and from Avecia, Inc., dated March 30, 2004 (copies attached as Exhibits A and B).

The above-referenced Supplemental Request for Information identifies Polyvinyl Chemicals, Inc. as having a possible connection to the Whitney Barrel Company. The pertinent time period identified as being investigated is 1950 to 1985. As previously stated, during this time period, Polyvinyl Chemicals operated at two different facilities within the vicinity of the subject Site, at 26 Howley Street, Peabody, Massachusetts from approximately 1959 until 1967 and at 730 Main Street, Wilmington, Massachusetts from 1967 to the present, subject to the various changes in business ownership as set forth in the above-referenced March 30, 2004 correspondence and as set forth in a response of AstraZeneca to a Request for Information for the Sutton Brook Disposal Area Superfund Site in Tewksbury, MA, dated April 6, 2001 (copy without enclosures attached as Exhibit C).

As previously stated in the above-referenced March 30, 2004 correspondence, Polyvinyl Chemicals, Inc. is not n/k/a AstraZeneca Pharmaceuticals, LP. The business that was previously

0045-1247

Martha Bosworth
February 6, 2007
Page 2

known as Polyvinyl Chemicals, Inc. is now owned and operated by DSM NeoResins, at 730 Main Street, Wilmington, Massachusetts.

Based upon the parties' additional investigation, no additional information responsive to the Whitney Barrel Company Request for Information is available at this time. As previously stated, Polyvinyl Chemicals has never operated at Eames Street, Wilmington, Massachusetts, as inferred by the interview documentation of a former Whitney Barrel employee, which was included in the documentation enclosed with the Agency's January 4, 2007 Supplemental Request for Information. However, we do note that a non-related company, National Polychemicals, Inc. operated a business at 51 Eames Street, Wilmington, Massachusetts which operated from 1953-1986 by several owners including American Biltrite Rubber Co., Fisons Limited, Fisons Corporation, Stepan Chemical Corporation and Olin Corporation. This facility is now the NPL Site known as Olin Chemical, Wilmington, Massachusetts. We further note that the interview documentation of the former Whitney Barrel employee identifies the pertinent party as "Poly Chemical/Poly Vinyl of Eames Street, Wilmington, MA." (Paragraph 7 of Enforcement Documentation).

This response is submitted on behalf of the aforementioned Polyvinyl Chemicals, Inc., based upon a good faith investigation consistent with the requirements of CERCLA 104(e). Polyvinyl Chemicals, Inc. and our client will comply with their obligations to provide EPA responsive information, if such information is discovered following submittal of this Response.

Please contact the undersigned regarding further information or inquiry with respect to this matter.

Very truly yours,



John A. Andreasen

JAA:it
Enclosure

cc: Luke Mette (w/enclosures)
Senior Counsel
AstraZeneca Pharmaceuticals LP
1800 Concord Pike
PO Box 15437
Wilmington, DE 19850

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

NEW ENGLAND
1 CONGRESS STREET, SUITE 1100,
BOSTON, MA. 02114-2023

DATE: December 15, 2003 (Memo to File)

FROM: Search & Cost Recovery Section

TO: File

SUBJ.: (Interview) SSID #
(Wells G & H)

MEMORANDUM

ENFORCEMENT CONFIDENTIAL
ATTORNEY/CLIENT PRIVILEGE

Person Interviewed:

On Monday, November 24, 2003, I traveled to Burlington, Massachusetts to meet with the above-named individual. Upon arrival, I was greeted at the door by a female that introduced herself as the wife of [REDACTED]. I advised her as to whom I was and why I was there. She invited me in and led me to the dining area. [REDACTED] was aware of the reason for my visit and felt very strongly that she and I should talk, which we did, before I began dialog with her husband.

[REDACTED] entered the dining area shortly afterwards. I rose, presented my identification to him and in turn, he introduced himself to me. [REDACTED] left the room and [REDACTED] and I sat and then began to have conversation. [REDACTED] advised me of his medical condition and what he has gone through so far but felt that the worst was over and he was well on the road to recovery. I advised [REDACTED] of my reason for being there and what I was looking to

REDACTED

0045-0001

accomplish by my visit with him. He was very cooperative and straight forward.
advised me of the following:

1. worked at Whitney Barrel at 256 Salem Street, Woburn, MA from 1969 until 1976.

2. He performed many functions while there. He was a truck driver, a barrel painter, a barrel washer and he did any other job that needed to be done.

3. His main job was that of the Whitney Barrel Company truck operator. His duty was to pick up and deliver barrels for the company. The truck could carry as many as 150 barrels per load.

4. Whitney Barrel Company usually employed at least five employees but during the summer, extra help was hired.

5. Some of the other Whitney Barrel Company employees were:

6. The Whitney Barrel Company was in the business of collecting, cleaning, refurbishing, recycling and selling used barrels and sometimes two-, three- and ten-thousand gallon tanks. The business was located at 256 Salem Street, Woburn, MA.

7. Whitney Barrel Company picked up barrels for refurbishing and recycling from
Poly Chemical/Poly Vinyl
of Eames Street, Wilmington, MA,

All barrels picked up from the above locations were taken to Whitney Barrel Company and put through the refurbishing/recycling process.

8. Whitney Barrel Company also traded barrels with other companies, depending upon the needs of the different companies. Some of the barrel companies involved in the trading were:

REDACTED

0045-0002

11. **Poly Chemical Company:** The drums from this location were brought to the Whitney Barrel Company for recycling. The residues from these drums, when dumped, would turn the water in the cleaning cycle green. These drums had markings on them but he does not remember what markings. He did not recall any particular odor from these drums, just smelled like chemicals.

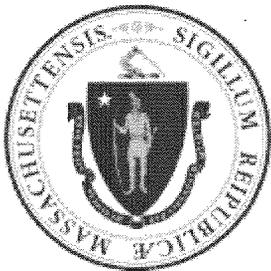
REDACTED

0045-0003

15. Drums with residues inside would come in, the covers went one way and the rings went another. The contents of the drums would be dumped in the hole in the floor. The hole was four to five feet in diameter and about five feet deep with a grate over it. The grate was "messed" up once and an employee fell into the hole. Could not remember the name of the employee. It was said that the drain ran out to the sewer but "stuff" still leached out to the Aberjona River.

REDACTED

0045-0004



The Commonwealth of Massachusetts
William Francis Galvin

Secretary of the Commonwealth, Corporations Division
 One Ashburton Place, 17th floor
 Boston, MA 02108-1512
 Telephone: (617) 727-9640

STEPAN CHEMICAL COMPANY Summary Screen

Help wit

[Request a Certificate](#)

The exact name of the Foreign Corporation: STEPAN CHEMICAL COMPANY

Entity Type: Foreign Corporation

Identification Number: 361823834

Date of Registration in Massachusetts: 12/18/1972

Date of Withdrawal: 12/21/1993

The is organized under the laws of: State: DE Country: USA on: 06/30/1971

Current Fiscal Month / Day: 12 / 31 Previous Fiscal Month / D:

The location of its principal office:

No. and Street: RDS
 City or Town: NORTHFIELD State: IL Zip: 60093 Country: USA

The location of its Massachusetts office, if any:

No. and Street:
 City or Town: State: Zip: Country:

Name and address of the Registered Agent:

Name:
 No. and Street:
 City or Town: State: Zip: Country:

The officers and all of the directors of the corporation:

Title	Individual Name First, Middle, Last, Suffix	Address (no PO Box) Address, City or Town, State, Zip Code	Ex c
PRESIDENT	F. Q. STEPAN	200 LINDEN AVE., WINNETKA, IL 60093 USA 200 LINDEN AVE., WINNETKA, IL 60093 USA	
TREASURER	UNKNOWN	U NKNOWN,	

		U NKNOWN,
SECRETARY	UNKNOWN	U NKNOWN, U NKNOWN,

business entity stock is publicly traded:

The total number of shares and par value, if any, of each class of stock which the business entity is authorized to issue:

Class of Stock	Par Value Per Share Enter 0 if no Par	Total Authorized by Articles of Organization or Amendments		Total Issued and Outstanding Num of S
		Num of Shares	Total Par Value	

No Stock Information available online. Prior to August 27, 2001, records can be obtained on microfilm

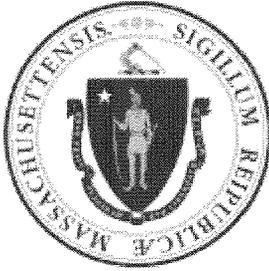
Consent
 Manufacturer
 Confidential Data
 Does Not Require Annual Report
 Partnership
 Resident Agent
 For Profit
 Merger Allowed

Note: There is additional information located in the cardfile that is not available on the system.

Select a type of filing from below to view this business entity filings:

- ALL FILINGS
- Amended Foreign Corporations Certificate
- Annual Report
- Annual Report - Professional
- Application for Reinstatement

Comments



The Commonwealth of Massachusetts
William Francis Galvin

Secretary of the Commonwealth, Corporations Division
 One Ashburton Place, 17th floor
 Boston, MA 02108-1512
 Telephone: (617) 727-9640

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Entity Name: STEPAN CHEMICAL COMPANY

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<input type="checkbox"/>	Annual Report	1991	12/29/1993	020502095306	Index Number = 93128834 (1 pages)
<input type="checkbox"/>	Annual Report	1987	12/29/1993	020502095311	Index Number = 93128838 (1 pages)
<input type="checkbox"/>	Annual Report	1993	12/29/1993	020502095303	Index Number = 93128832 (1 pages)
<input type="checkbox"/>	Annual Report	1989	12/29/1993	020502095309	Index Number = 93128836 (1 pages)
<input type="checkbox"/>	Annual Report	1990	12/29/1993	020502095308	Index Number = 93128835 (1 pages)
<input type="checkbox"/>	Annual Report	1986	12/29/1993	020502095312	Index Number = 93128839 (1 pages)
<input type="checkbox"/>	Annual Report	1985	12/29/1993	020502095313	Index Number = 93128840 (1 pages)
<input type="checkbox"/>	Annual Report	1984	12/29/1993	020502095314	Index Number = 93128841 (1 pages)
<input type="checkbox"/>	Annual Report	1992	12/29/1993	020502095305	Index Number = 93128833 (1 pages)
<input type="checkbox"/>	Annual Report	1988	12/29/1993	020502095310	Index Number = 93128837 (1 pages)
<input type="checkbox"/>	Annual Report	1983	12/29/1993	020502095315	Index Number = 93128842 (1 pages)
<input checked="" type="checkbox"/>	Certificate of Withdrawal		12/21/1993	020502091191	Index Number = 93366059 (4 pages)
<input type="checkbox"/>	Annual Report	1980	6/30/1981	020501764599	Index Number = 81018510 (1 pages)
<input type="checkbox"/>	Foreign Corporation Certificate			000361823834	Index Number = None (0 pages)

Request

Annual Reports and No Fee changes have a retention period of ten years; therefore these documents are no longer available prior to December 31, 1993.

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Department of State: Division of Corporations

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Entity Details

THIS IS NOT A STATEMENT OF GOOD STANDING

File Number: 0533511 **Incorporation Date / Formation Date:** 02/19/1959 (mm/dd/yyyy)

Entity Name: STEPAN COMPANY

Entity Kind: CORPORATION **Entity Type:** GENERAL

Residency: DOMESTIC **State:** DE

REGISTERED AGENT INFORMATION

Name: THE CORPORATION TRUST COMPANY

Address: CORPORATION TRUST CENTER 1209 ORANGE STREET

City: WILMINGTON **County:** NEW CASTLE

State: DE **Postal Code:** 19801

Phone: (302)658-7581

Additional Information is available for a fee. You can retrieve Status for a fee of \$10.00 or more detailed information including current franchise tax assessment, current filing history and more for a fee of \$20.00.

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To contact a Delaware Online Agent [click here](#).