

US EPA ARCHIVE DOCUMENT



Superfund Records Center
Wells G & H
119
282351

HUNTON & WILLIAMS LLP
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RALEIGH, NC 27602-0109

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ETHAN S. NAFTALIN
DIRECT DIAL: 919 899 3090
enaftalin@hunton.com

February 20, 2004

46520.9



SDMS DocID

282351

Via Email and UPS

Ms. Martha Bosworth
EPA Region 1
Office of Site Remediation and Restoration (HBS)
1 Congress Street
Boston, MA 02114

Re: MAD 980732168; Wells G & H, Woburn, MA
December 15, 2003 RFI to Geo. A. Goulston Co.

Dear Ms. Bosworth:

I enclose the response of Goulston Technologies.

Goulston asserts business confidentiality as to Attachment 2 under 40 CFR § 2 and privacy status to Attachment 6.

Please contact me if you need anything further.

Best regards,

Ethan S. Naftalin

Enclosure

c: Charles D. Case (w/ enc.)
Alan Gold (w/ enc.)
Veronica McKinney (w/ enc.)
Mary Jane O'Donnell (w/ enc.)

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US EPA ARCHIVE DOCUMENT

Response of Goulston Technologies, Inc. to December 15, 2003 Request for Information

Wells G and H Superfund Site - Woburn, MA

BUSINESS CONFIDENTIALITY ASSERTED AS TO ATTACHMENT 2 - 40 CFR § 2

1. General Information about Respondent

Period of Investigation: 1950 - 1985

a. Name/Address

Response:

Goulston Technologies, Inc.
PO Box 5025
Monroe, NC 28111-5025

Legal form: corporation
State of Incorporation: Delaware
Business Description: manufacturer of fiber lubricants

Respondent is successor by merger to

George A. Goulston Company
1000 Crescent Boulevard
Scituate, Massachusetts 02066

Legal form: corporation
State of Incorporation: Massachusetts
Business Description: manufacturer of fiber lubricants

and

George A. Goulston Co., Inc.
700 North Johnson Street
Monroe, NC 28110

Legal form: corporation
State of Incorporation: North Carolina
Business Description: manufacturer of fiber lubricants

b. Persons Answering on Respondent's Behalf

Response:

Alan Gold - VP- Finance
Veronica McKinney - HSE Manager
Mike Newsome - Accounting Manager

Goulston Technologies, Inc.
PO Box 5025
Monroe, NC 28111-5025
704 289 6464

c. Contact Person for Respondent

Response:

Veronica McKinney - HSE Manager
 Goulston Technologies, Inc.
 PO Box 5025
 Monroe, NC 28111-5025
 704 289 6464

d. Other Region 1 Superfund Sites

Response: None

2. Respondent's Legal Status

Period of Investigation: 1950 - 1985

Persons Providing Information

Alan Gold and Mike Newsome - see response to question 1.

a. Prior Names and Use of Same

Response: George A. Goulston Company; 1969-1995

b. Corporate Information

i. date of incorporation

Response: 1988

ii. state of incorporation

Response: Delaware

iii. service agent

Response: Alan Gold (see address above)

c. Entity other than Corporation

Response: not applicable

d. Affiliations during Period

Response: none other than the Goulston entities identified in response to question 1

e. Predecessors-in-interest

Response: none other than the Goulston entities identified in response to question 1

f. Transaction Information and Documents

Response: See Attachment 2 - BUSINESS CONFIDENTIALITY ASSERTED - 40 CFR § 2

g. Bankruptcy

Response: not applicable

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. Addresses of Respondent's Operating Location(s)

Response:

George A. Goulston Company
1000 Crescent Boulevard
Scituate, MA 02066

b. Description of Respondent's Operations

i. date operations commenced and concluded

Response: 1937-1991

ii. types of work.

Response: manufacturer of fiber lubricants

iii. type of products handled

Response: mineral oils and surfactants

c. Enclosure F Constituents Managed at Respondent's Locations

Response: no information available

d. Changes in Operations

Response: no information available

e. Product List

Response: See Attachment 3

f. Raw Materials Used

Response: no information available

g. Maintenance

i. material used

Response: no information available

ii. monthly or annual quantity of each material used

Response: no information available

h. Spill Response

i. materials spilled in operations

Response: no information available

ii. materials used to clean up spills

Response: no information available

iii. cleanup methods

Response: no information available

- iv. management of cleanup residue

Response: no information available

- i. Schematic Diagram of Operations

Response: no information available

- j. Knowledgeable Persons

Response: no information available

4. Respondent's Wastes

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

- a. Waste Survey

See Attachment 4.

- b. Waste Characteristics

- i. physical state

Response: no additional information

- ii. name and chemical composition

Response: no additional information

- iii. monthly and annual waste volumes

Response: no additional information

- iv. dates of waste management

Response: no additional information

- c. Waste Management

- i. container type

Response: no additional information

- ii. container colors

Response: no additional information

- iii. container markings

Response: no additional information

- iv. container labels or writing

Response: no additional information

- v. new v. used container

Response: no additional information

- vi. waste management locations

Response: no additional information

- vii. prior container use - where applicable

Response: no additional information

d. Individuals with Waste Management Responsibility

Response: no additional information

e. Waste Management Records

Response: no additional information

f. Persons with Waste Management Knowledge

Response: no additional information

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. Individuals with Waste Management Responsibility

Response: no information available

b. Individuals with Waste Management Knowledge

Response: no information available

c. Individuals with Environmental Compliance Responsibility

Response: no information available

d. Specific Information

i. job title

Response: no information available

ii. duties

Response: no information available

iii. dates performing those duties

Response: no information available

iv. supervisors

Response: no information available

v. tenure

Response: no information available

vi. nature of information possessed

Response: no information available

e. Containers

i. type

Response: no information available

ii. color

Response: no information available

iii. stripes and markings

Response: no information available

iv. labels and writing

Response: no information available

v. whether new or used

Response: no information available

vi. where used, prior use

Response: no information available

f. Contracts and Arrangements - Description

Response: no information available

g. Ibid - Documents

Response: no information available

h. Destinations

Response: no information available

i. Waste Carriers

Response: no information available

j. Respondent as Waste Carrier

Response: no information available

k. Specific Waste Carriers

Response: no information available

l. Frequency

Response: no information available

m. Volume

Response: no information available

n. Management Period

Response: no information available

o. Documents

Response: no information available

p. Waste Carrier Employees

Response: no information available

q. Waste Destinations - Descriptions

Response: no information available

r. Ibid - Documents

Response: no information available

s. Waste Pickup

i. inventory

Response: no information available

ii. pickup requests

Response: no information available

iii. waste carrier contacts

Response: no information available

iv. charges

Response: no information available

v. Respondent's payor employees

Response: no information available

vi. waste carrier payment collection agents

Response: no information available

t. Selector of Waste Management Facilities

Response: no information available

u. Ibid - Supporting Documents

Response: no information available

v. Knowledgeable Persons

Response: no information available

6. Respondent's Environmental Reporting

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

a. RCRA Identification Numbers

Response: MAD066619214

b. Federal Offices to Which Waste Information Sent

Response: no information available

c. Period of Information

Response: no information available

d. State Offices to Which Waste Information Sent

Response: no information available

e. Period of Information

Response: no additional information

f. Other Reporting Programs

Response: no information available

g. Offices to Which Other Program Information Sent

Response: no information available

7. Respondent's Association with Whitney Barrel Company

Period of Investigation: 1950 - 1985

Person Providing Information: [former employee] see Attachment 6 - PRIVACY MATERIAL

a. Business Association

Response: George A. Goulston Company purchased approximately two truckloads of clean reconditioned drums (140-160 total drums) from Whitney Barrel Company.

b. Purchase of Drums/Containers

Response: Yes.

i. dates of each pickup and delivery:

Response: late 1950s or early 1960s

ii. container type

Response: drums

iii. container size

Response: 55 gallon

iv. container condition

Response: good

v. container contents

(a) the name of each material:

Response: none (empty)

(b) the chemical composition of each material:

Response: not applicable

(c) the physical state of each material (e.g., solid, sludge, liquid):

Response: not applicable

(d) the volume of each material:

Response: not applicable

vi. documentation relating to these transactions:

Response: none available

c. Shipments to Whitney Barrel

Response: yes

i. pickup and delivery dates

Response: shipment dates: 1/02/80, 4/18/80, 6/13/80, 8/22/80, 10/31/80, 12/29/80, 2/10/81, 4/22/81, 6/26/81, 7/16/81, 8/04/81, 10/09/81, 12/17/81, 2/19/82, 7/01/82, 7/19/82, 5/16/83

ii. container type

Response: drums

iii. container size

Response: no information available

iv. container condition

Response: used

v. container contents

(a) name

Response: (none) empty

(b) chemical composition

Response: not applicable

(c) physical state (e.g., solid, sludge, liquid)

Response: not applicable

(d) volume

Response: not applicable

vi. documentation

Response: See Attachments 3 (list of products) and 5 (summary of shipments to Whitney Barrel). The summary is based on the information found in Attachment 3.

d. Cleaning/Reconditioning of Containers

i. period

Response: no information available

ii. container type

Response: no information available

iii. container size

Response: no information available

iv. container condition

Response: no information available

v. container contents

(a) name

Response: no information available

(b) chemical composition

Response: no information available

(c) physical state (e.g., solid, sludge, liquid)

Response: no information available

(d) volume

Response: no information available

vi. documentation

Response: no information available

e. Other Services

i. type

Response: no information available

ii. frequency

Response: no information available

iii. period

Response: no information available

iv. documentation

Response: no information available

f. Transport for Customers

Response: no information available

g. Customer Identification

Response: no information available

h. Deliveries to Whitney Barrel

i. period

Response: same as 7ci

ii. container type

Response: drums

iii. container size

Response: no information available

iv. container condition

Response: used

v. container contents

(a) name

Response: (none) empty

(b) chemical composition

Response: not applicable

(c) physical state (e.g., solid, sludge, liquid)

Response: not applicable

(d) volume

Response: not applicable

vi. documentation

Response: See Attachment 5 - summary of shipments to Whitney Barrel.

i. Knowledgeable Persons

Response: former employee - see Attachment 6 - PRIVACY MATERIAL

8. Information about Others

Period of Investigation: 1950 - 1985

Response: none

9. Compliance with Request

Period of Investigation: 1950 - 1985

a. Sources of Information

i. Individuals Providing Information

Response: See responses to sections 1 and 7 above.

ii. Job Title and Description

Response:

Alan Gold

- Vice president - finance
- manages accounting, information systems and HR functions for Goulston Technologies, Inc.

Veronica McKinney

- health safety and environmental manager
- manages safety, health and environmental programs for Goulston Technologies, Inc.

Mike Newsome

- accounting manager
- manages accounting functions for Goulston Technologies, Inc.

Former employee - see Attachment 6 - PRIVACY MATERIAL

iii. Prior Job Titles and Descriptions

Response:

Alan Gold - none

Veronica McKinney - Environmental & Safety Specialist

Mike Newsome - none

iv. Employment Status

Alan Gold - current employee

Veronica McKinney - current employee

Mike Newsome - current employee

v. Names of Offices Where Records Reviewed

Response:

Goulston Technologies
700 North Johnson Street
Monroe, NC 28110

vi. Nature of Records Reviewed

Response:

Sales Analyses - prior/current location – Accounting department in file storage area - Monroe office.

Acquisition Agreement - prior/current location – Accounting department in file storage area - Monroe office.

Waste Files – prior location –downstairs HSE files - Monroe office. Current location- HSE files in HSE Manager’s office - Monroe office.

vii. Location of Records Prior to Review

Response: Some records may have been located previously in Scituate, Massachusetts.

viii. Current Location of Records

Response: no change from when reviewed

Attachments

1. Corporate History - February 2004 Letter
2. Transaction Document Excerpts - **Business Confidentiality Asserted - 40 CFR § 2**
3. Product List
4. Waste Survey and April 23, 1983 Commonwealth Notice
5. Summary of Shipments to Whitney Barrel
6. Privacy Material
7. Declaration

Attachment 1

Corporate History - February 2004 Letter



GOULSTON TECHNOLOGIES, INC.

THE LEADER IN FIBER LUBRICANT TECHNOLOGY

February 19, 2004

Mr. Ethan S. Naftalin
Hunton & Williams LLP
One Hannover Square
Suite 1400
Raleigh, NC 27601

Dear Mr. Naftalin:

As you requested, we are providing the following information to enable you to respond to EPA Information Request (MAD 980732168, Wells G & H, Woburn, MA).

Goulston Massachusetts was organized in Massachusetts on August 13, 1937. Goulston North Carolina was organized on September 27, 1956. Please note that Goulston North Carolina did not move to its Monroe location until 1969.

Goulston Delaware was organized in Delaware on January 27, 1988 by Takemoto Oil & Fat Co., Ltd. On February 29, 1998, Goulston Delaware acquired the stock of Goulston Massachusetts and Goulston North Carolina and simultaneously changed its name to George A. Goulston Co., Inc. At around 1995, George A. Goulston Company, Inc. changed its name to Goulston Technologies.

Please note that the Acquisition Agreement documenting Takemoto's purchase of Goulston is located in Goulston's Accounting Department and is over three inches thick. In lieu of sending that entire volume, I am providing you with copies of the memorandum of closing and table of contents to assist you in answering the EPA inquiry. If you need additional documents in this volume, please let me know.

We hope that this information is sufficient to facilitate the response. Please feel free to contact me if you have further questions or need additional documentation.

Sincerely,

GOULSTON TECHNOLOGIES, INC.


Alan J. Gold
Vice President - Finance

Enclosures

Attachment 3

Product List

List of Products Question 3a of RFI

PART NUMBER RECAP

US EPA ARCHIVE DOCUMENT

PART #	DESCRIPTION	CURRENT MONTH				YEAR TO DATE			
		QTY	VALUE	COST	%	QTY	VALUE	COST	%
SG001	RACKING					4	14.00	.00	.00
SG002	USED CPUs	143	350.00	.00	.00	552	1,957.50	.00	.00
SG003	DRUMS RETURNED	79	339.90	.00	.00	1,572	5,891.30	.00	.00
SG010	MT HAULAGE					10	400.00	.00	.00
S1107	FY266	36,096	19,896.52	10,487.06	.53	342,500	184,842.10	93,012.99	.50
S1108	FYR7					7,620	5,506.42	2,861.43	.52
S1114	STAINL	5,561	4,498.41	2,593.19	.53	56,907	47,575.53	27,161.78	.57
S1116	USC3H	30,560	13,900.00	8,094.42	.58	330,562	146,817.66	93,072.07	.57
S1118	TOPRSC	140,333	47,972.92	31,877.14	.66	1,592,662	516,065.51	337,122.73	.65
S1119	TOPSOL2					97,045	29,242.15	18,617.70	.63
S1120	FY6595	10,340	7,416.60	5,862.40	.79	275,122	189,109.60	140,908.99	.78
S1121	HEASO					21,930	9,001.60	5,106.65	.56
S1123	HEARG	3,440	2,580.00	1,373.79	.53	271,330	191,561.45	100,749.83	.53
S1124	STATIC NIL CAS	5	101.25	24.24	.24	27	1,031.25	214.93	.21
S1125	OS12A	4,416	4,592.64	2,174.23	.47	15,172	12,876.92	6,245.50	.48
S2110	L77L71	25,600	11,648.00	6,166.52	.53	160,832	79,495.51	41,233.63	.52
S2126	LE4					400	160.00	79.40	.49
SE111	GN46					15,533	6,423.14	3,095.31	.48
SE114	LN336					10,345	10,121.60	7,002.58	.69
S9999	MISCELLANEOUS	1	20.00	.00	.00	6,290	5,995.93	45.00	.01
SR0202	SRC202	1,026	964.44	664.60	.69	2,026	1,834.44	1,269.69	.69
SR0302	SRC302					270	155.25	139.08	.50
SR0802	SRC802					92	84.54	46.92	.56
SR0903	SRC903	20,500	4,228.00	3,127.25	.86	40,535	4,235.00	3,735.34	.89
SR0923	SRC923	1	45.00	20.00	.05	1	45.00	20.00	.05
		277,531	117,884.48	72,047.01	.62	3,254,175	1,478,448.70	677,621.58	.61

9/24/80

*** PART NUMBER RECAP ***

SERIES #	CURRENT MONTH				YEAR TO DATE			
	QTY	VALUE	COST	%	QTY	VALUE	COST	%
8000 SERIES	44	10.10	.00	.00	1,020	4,319.80	.00	.00
8100 SERIES	270,741	100,958.94	62,287.57	.62	3,010,877	1,334,212.19	820,974.60	.62
8200 SERIES	25,600	11,678.00	6,166.52	.53	189,252	79,601.51	41,313.03	.52
8600 SERIES					25,278	10,544.74	10,097.89	.61
8900 SERIES	1-	20.00-	.00	.00	1,290	5,995.93	45.00	.01
8900 SERIES	21,527	5,237.44	4,393.97	.84	22,924	6,354.23	5,191.06	.82
	277,931	117,884.48	72,847.81	.62	3,254,175	1,438,408.70	877,621.58	.61
TOTALS WITHOUT SUCC	277,967	117,874.38	72,847.81	.62	3,255,201	1,442,708.50	877,621.58	.61

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PART #	DESCRIPTION	CURRENT Y-T-D				LAST Y-T-D			
		QTY	VALUE	COST	%	QTY	VALUE	COST	%
S0001	PACKING	2	8.00	.00	.00	4	14.00	.00	.00
S0002	USED DRUMS	798	1,538.00	.00	.00	552	1,957.50	.00	.00
S0003	DRUMS RETUR	1,706-	6,153.99-	.00	.00	1,572-	5,891.30-	.00	.00
S0010	MT HAULAGE					10-	400.00-	.00	.00
S1107	PY268	380,030	183,286.68	90,961.54	.50	342,500	184,842.10	93,012.99	.50
S1108	PY17	8,080	6,660.00	3,527.00	.53	7,620	5,506.42	2,861.43	.52
S0114	STATNIL	37,795	33,367.11	18,204.19	.55	58,907	47,575.53	27,161.78	.57
S0116	OSC3M	378,330	189,233.89	108,731.08	.57	330,562	146,817.66	83,072.07	.57
S1118	DOPRSC	1,919,465	724,835.81	505,711.27	.70	1,592,662	516,065.51	337,122.73	.65
S0119	DOPBOL2					97,045	29,742.15	18,617.70	.63
S0120	PY6595	198,893	145,633.94	110,625.85	.76	275,122	189,109.60	146,808.99	.79
S0121	WEA50	34,716	15,920.61	9,378.00	.59	21,930	9,001.60	5,106.65	.56
S1123	WEARG	443,078	334,323.19	183,452.19	.55	271,330	191,561.45	100,749.83	.53
S1124	STATIC NIL	48	2,154.00	559.56	.26	27	1,031.25	214.93	.21
S1125	OS12A	4,370	5,025.50	2,462.95	.49	13,172	12,878.92	6,245.50	.48
S2110	L77L71	322,147	58,864.71	33,753.26	.57	188,832	79,495.51	41,233.63	.52
S2118	UROL 232	7,235	4,032.00	2,758.83	.68				
S2126	404					400	166.00	79.40	.48
S2138	WF290A	137,400	55,647.00	46,970.21	.84				
S2041	U212A	4,802	2,883.79	2,051.04	.71				
S4122	UROL PPZ81	800	862.40	558.60	.64				
S6002	UROL NR-22	400	376.00	225.80	.60				
S8011	UN46	1,590-	531.10-	267.68-	.50	15,533	6,423.14	3,095.31	.48
S8014	UN230	10,985	13,002.15	8,253.34	.63	10,345	10,121.60	7,002.58	.69
S8020	UN46M	10,266	4,773.03	2,440.64	.51				
S9999	MISCELLANEO	3,335	2,009.22	391.80	.20	6,290	5,995.83	45.00	.01
S0202	SRC202	1,028	966.32	663.92	.69	2,026	1,834.44	1,269.69	.69

PARTIAL

9/22/81

***** PART NUMBER RECAP *****

US EPA ARCHIVE DOCUMENT

PART #	DESCRIPTION	- P - C U R R E N T Y - T - D - - -				- - - L A S T Y - T - D - - -			
		QTY	VALUE	COST	%	QTY	VALUE	COST	%
SR0302	: SRC302					270	155.25	139.08	.90
SR0802	: SRC802					92	84.54	46.92	.56
SR0903	: SR0903	20,573	4,248.00	3,744.19	.88	20,535	4,235.00	3,733.34	.88
SR0966	: SR0966	135	99.00	67.67	.68				
SR0983	: SRC983	1	51.00	2.02	.04	1	45.00	2.03	.05
		3,652,346	1,783,006.26	1,135,220.27	.64	3,254,175	1,436,448.70	877,621.58	.61

0014-0055

09/25/82

*** PART NUMBER RECAP ***

PART #	DESCRIPTION	--- CURRENT ---				--- LAST Y ---			
		QTY	VALUE	Y-T-D	COST	QTY	VALUE	Y-T-D	COST
SR0202	SR0202					1,028	966.32	663.92	.69
SR0801	SR0801	1,000	680.00	600.00	.88				
SR0903	SR0903					20,573	4,248.00	3,744.19	.88
SR0966	SR0966					15	99.00	67.67	.68
SR0983	SR0983	2	112.00	4.34	.04	1	51.00	2.02	.04
SR1036	SR1036	370	447.70	455.88	1.02				
999	SR9999	400	552.00	522.40	.95				
S0001	PACKING					2	8.00	.00	.00
S0002	USED DRUMS	774	1,470.00	.00	.00	798	1,518.00	.00	.00
S0003	DRUMS RETURN	1,522	5,468.10	.00	.00	1,706	6,153.99	.00	.00
S1107	PY268	264,550	162,744.65	81,097.60	.50	310,030	183,206.68	90,961.54	.50
S1108	PY87	10,800	10,396.00	4,958.50	.48	8,000	6,660.00	3,527.00	.53
S1114	STATNIL	39,682	37,767.55	18,872.85	.50	37,795	33,367.11	18,204.19	.55
S1116	OSC3H	387,226	210,006.81	109,272.77	.52	378,330	189,233.89	108,731.08	.57
S1118	TOPRSC	1,783,114	738,055.59	478,727.50	.65	1,919,655	724,835.81	505,711.27	.70
S1120	PY6595	88,108	65,303.72	51,067.72	.78	198,893	145,633.94	110,625.85	.76
S1121	HEASD	18,060	8,806.40	5,199.37	.59	34,716	15,920.61	9,378.00	.59
123	HEARG	400,398	308,064.23	172,333.27	.56	443,978	334,323.19	183,452.19	.55
S1124	STATIC NIL	39	1,755.00	526.89	.30	48	2,154.00	559.56	.26
S1125	DS12A	2,150	2,472.50	1,208.49	.49	4,370	5,025.50	2,462.95	.49
S1126	PY6595	20,680	15,858.98	10,286.65	.65				
S2110	L77L71	130,400	67,654.00	38,230.37	.57	122,147	58,854.71	33,753.26	.57
S2118	LUR0L212					7,235	4,032.00	2,758.83	.68
S2133	LS 548	13,320	12,454.20	11,822.98	.95				
S2135	LS 612	54,400	48,688.00	46,024.47	.95				
S2138	LF210AS	160,000	66,000.00	55,264.00	.84	137,400	55,647.00	46,970.21	.84

0014-0056

09/25/82

*** PART NUMBER RECAP ***

PART #	DESCRIPTION	--- CURRENT Y-T-D ---				--- LAST Y T-D ---			
		QTY	VALUE	COST	%	QTY	VALUE	COST	%
S2141	L212A	17,184	10,817.76	7,477.72	.69	4,802	2,883.79	2,051.04	.71
S2143	L283	4,704	3,281.04	1,728.54	.53				
S2145	L210AS	120,000	51,600.00	39,358.80	.76				
S4122	LPP781					880	862.40	551.60	.64
S4129	LUROL PP-91	440	433.40	256.64	.59				
S6102	LUROL NR-22	400	392.00	227.00	.58	400	376.00	225.80	.60
S8106	LUREN 130	3,200	1,576.00	539.20	.34				
S8111	LN46					1,590	531.10	267.68	.50
S8114	LN330					10,985	13,002.15	8,253.34	.63
S8120	LN46M	2,859	1,521.27	567.07	.37	10,266	4,773.03	2,440.64	.51
S8121	PY268BASE	2,842	2,078.66	1,774.71	.86				
S8122	TOPRSCBASE	15,180	8,273.10	7,056.81	.85				
S8123	L-1066	2,100	798.00	481.89	.60				
S9999	MISCELLANEO	2,346	1,290.30	1,290.30	1.00	3,338	2,009.22	391.80	.20
T0113	MILUBE A33	36	38.16	21.60	.57				
		3,540,550	1,833,336.32	1,144,675.73	.62	3,652,386	1,783,006.26	1,139,220.27	.64

09/30/83

*** PART NUMBER RELAP ***

PART #	DESCRIPTION	CURRENT			LAST Y		
		QTY	VALUE	Y-T-D COST %	QTY	VALUE	Y-T-D COST %
SR0901	SR0901				1,000	690.00	594.00 .87
SR0966	SR0966	15	101.00	75.91 .75			
SR0983	SR0983				2	112.00	4.34 .04
SR1034	SR1034	45	90.00	90.00 1.00			
SR1036	SR1036				370	447.70	452.89 1.01
SR9999	SR9999	7,760	5,569.06	5,726.69 1.03	400	552.00	519.40 .94
S0002	USED DRUMS	85	115.40	.00 .00	774	1,470.00	.00 .00
S0003	DRUMS RETUR	1,308	6,139.00	.00 .00	1,522	5,468.10	.00 .00
S1107	PY268	262,730	160,378.10	78,396.76 .49	264,550	162,744.65	79,936.60 .49
S1108	PY87	9,200	8,908.00	4,279.42 .48	10,800	10,396.00	4,889.50 .47
S1114	STATNIL	25,300	24,267.30	11,458.85 .47	39,682	37,767.55	18,704.85 .50
S1116	OSC3H	383,052	211,932.24	97,965.14 .46	397,226	210,006.81	107,577.77 .51
S1118	TOPRSC	1,435,301	759,026.18	463,464.48 .61	1,783,114	738,055.59	473,213.50 .64
S1120	PYG595				88,108	65,303.72	50,830.72 .78
S1121	HEASO	11,610	5,774.90	3,206.82 .56	18,060	8,806.40	5,133.37 .58
S1123	HEARG	488,580	368,762.70	199,784.37 .54	400,398	308,064.23	171,382.27 .56
S1124	STATIC NIL	21	945.00	289.11 .31	39	1,755.00	526.89 .30
S1125	OS12A	2,200	2,530.00	1,208.83 .48	2,150	2,472.50	1,193.49 .48
S1126	PYG595	114,816	84,710.40	54,725.92 .65	20,680	15,858.98	10,232.65 .65
S1128	TOPRSC-346	41,380	17,896.60	8,207.78 .46			
S2105	L-51	390	196.95	152.79 .78			
S2110	L77L71	202,000	100,934.00	53,114.96 .53	130,400	67,654.00	37,552.37 .56
S2125	L-255	3,200	1,280.00	1,366.40 1.07			
S2133	LS 548	13,320	12,787.20	11,861.58 .93	13,320	12,454.20	11,702.98 .94
S2135	LS 612	53,600	47,280.00	42,698.72 .90	54,400	48,688.00	45,616.47 .94
S2138	LF210AS				160,000	66,000.00	55,264.00 .84

PART #	DESCRIPTION	C U R R E N T				L A S T			
		QTY	VALUE	Y - T - D	%	QTY	VALUE	Y - T - D	%
S2141	L212A	1,600	1,036.00	722.80	.70	17,184	10,817.76	7,417.72	.69
S2143	L283	27,526	19,201.25	11,179.44	.58	4,704	3,281.04	1,698.54	.52
S2145	L210AS					120,000	51,600.00	39,358.80	.76
S2147	L-260A	7,595	4,892.80	2,548.97	.52				
S2155	LS585	5,328	8,125.20	7,512.80	.92				
S2156	LS921	2,960	2,619.60	2,350.40	.90				
S4129	LUROL PP-912					440	433.48	253.64	.59
S6102	LUROL NR-22	1,200	1,260.00	760.19	.60	400	392.00	227.00	.58
S6120	LTF+748M	800	2,360.00	1,787.38	.76				
S8106	LUREEN 130					3,200	1,576.00	539.20	.34
S8114	LN330	1,730	2,197.10	1,117.47	.51				
S8115	LN48M	2,271	1,440.61	583.10	.40				
S8120	LN46M	1,199	676.61	238.01	.35	2,859	1,521.27	549.07	.36
S8121	PY268BASE	1,840	1,343.20	1,152.31	.86	2,842	2,074.66	1,756.71	.85
S8122	TOPRSCBASE	35,506	19,350.76	15,235.76	.79	15,180	8,273.10	6,951.81	.84
S8123	L-1066					2,100	798.00	466.89	.59
S9999	MISCELLANEO	2,460	1,746.60	120.00	.07	2,346+	1,290.30+	1,290.30+	1.00
T0105	MILUBE A89	2,876	1,495.52	575.92	.39				
T0113	MILUBE A33					36	38.16	21.60	.57
		3,548,188	1,874,860.48	1,083,958.98	.58	3,540,550	1,833,336.32	1,133,278.73	.62

GEORGE A GULLSTON CO - SCITUATE
 PART NUMBER RECAP
 AS OF 8/31/84

9/24/84 PAGE 1
 8:18:11

W3-ANNE
 COST DATE 7/31/84

PART NO.	DESCRIPTION	CURRENT MONTH				YEAR TO DATE			
		QTY	VALUE	COST	X	QTY	VALUE	COST	X
SR0109	FOE 6.5 C12-C13 LINE	1,700	1,122.00	1,011.40	.90	1,700	1,122.00	1,011.40	.90
SR0320	PEG 400 MONOPELARGON					450	391.50	397.94	1.02
SR1034	TROYSAN 174	90	180.00	141.30	.79	449	898.00	701.61	.78
S00003	RETURNED DRUMS	276-	1,380.00-			2,099-	10,145.19-		
S01101	HEATHERLUBE 50					1,290-	606.30-	355.65-	.59
S01107	PYRONIL 268	54,990	33,515.70	17,070.70	.51	391,993	241,242.23	119,605.65	.50
S01108	PYRONIL 87					5,200	4,928.00	2,446.65	.50
S01113	TOPSOL RSC	222,948	93,694.52	55,922.31	.60	2,430,301	997,522.94	590,840.72	.59
S01114	STATIC NIL	1,840	1,729.60	871.19	.50	44,345	42,857.00	20,783.17	.48
S01116	OLIVE SUB C-3	40,932	21,727.80	11,189.70	.51	444,987	245,312.05	118,278.79	.48
S01120	FYRSTAT G-595	2,350	1,974.00	1,110.76	.56	119,945	91,100.95	56,910.75	.62
S01123	HEATHERLUBE RG	41,440	31,380.20	16,954.28	.54	553,780	414,755.45	218,900.21	.53
S01124	STATIC NIL CASES	4	180.00	54.86	.30	55	2,475.00	755.97	.31
S01128	TOPSOL RSC/346					15,840	7,444.80	3,033.68	.41
S01133	TOPSOL RSC BASE					33,774	18,406.82	14,913.45	.81
S02105	LURDL 51					780	421.20	310.99	.74
S02110	LURDL 77/LURDL 71	30,400	14,974.00	8,648.86	.58	248,437	124,274.94	73,686.91	.59
S02125	LURDL 255					2,000	900.00	785.38	.87
S02143	LURDL 283	5,600	3,904.00	2,248.47	.58	36,000	25,110.00	14,982.18	.60
S02147	LURDL 260-A					9,810	5,994.90	3,298.31	.55
S04158	LURDL NR-225					435	456.75	275.40	.60
S06102	GLOBE LS-585					13,653	20,820.83	18,846.10	.91
S06103	GLOBE LS-921					2,960-	2,619.60-	2,279.82-	.87
S09101	LURDL PP-912					440	506.00	271.94	.54
S12002	LURDL TF-165					36	54.00	50.56	.94
S12003	LURDL TF-748M					2,380	7,140.00	5,230.53	.73

0014-0060

W3-THINE
COST DATE 7/31/84

PART NUMBER RECAP
AS OF 8/31/84

8:18:11

PART NO.	DESCRIPTION	-----CURRENT MONTH-----				-----YEAR TO DATE-----			
		QTY	VALUE	COST	%	QTY	VALUE	COST	%
S13001	LUREEN 48M					1,895	1,010.03	463.70	.46
S13013	LUREEN 330					1,750	2,415.00	1,653.80	.68
S13999	GENERAL MISCELLANEOU					40	582.06-	304.19	.52-
S14101	MILUBE A-24					43	48.16	30.71	.64
S14105	MILUBE A-89	4,000	2,080.00	793.92	.38	21,600	11,232.00	4,294.08	.38
	TOTALS ***	406,018	205,083.82	116,017.75	.57	4,375,769	2,254,887.40	1,270,429.30	.56

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US EPA ARCHIVE DOCUMENT

0014-0061

AS OF 8/31/85

PART NO.	DESCRIPTION	C U R R E N T Y T D				L A S T Y T D			
		QTY	VALUE	COST	X	QTY	VALUE	COST	X
SR0109	FOE 6.5 C12-C13 LINE					1,700	1,122.00	1,011.40	.90
SR0320	PEG 400 MONOPELARGON					450	391.50	397.94	1.02
SR0802	HEXYL PHOSPHATE	3,614	2,971.21	2,213.95	.75				
SR0804	FOE 2 ETHYL HEXYL PO	940	799.00	643.62	.81				
SR0903	EXXON 1383 OIL	4,800	2,496.00	1,067.04	.43				
SR0943	WITCO 200 HT OIL	38	20.52	14.17	.69				
SR0966	ROSEMARY OIL	8	60.00	45.76	.76				
SR1000	DEMINEALIZED WATER	450	13.50						
SR1034	TROYBAN 174	717	1,434.00	1,105.71	.77	449	898.00	701.61	.78
S00002	NEW DRUMS	3	61.50						
S00003	RETURNED DRUMS	862-	4,171.67-			2,099-	10,145.19-		
S01101	HEATHERLUBE 50					1,290-	606.30-	355.65-	.59
S01107	PYRONIL 268	334,049	200,723.92	103,264.13	.51	391,993	241,242.23	119,605.65	.50
S01108	PYRONIL 87	1,951	1,990.02	959.20	.48	5,200	4,928.00	2,446.65	.50
S01113	TOPSOL RSC	2,121,787	853,027.44	525,713.77	.62	2,430,301	997,522.94	590,840.72	.59
S01114	STATIC NIL	28,684	27,610.41	13,437.97	.49	44,345	42,857.00	20,783.17	.48
S01116	OLIVE SUB C-3	278,159	154,895.91	79,573.09	.51	444,987	245,312.05	118,278.79	.48
S01120	PYROSTAT G-595	121,865	96,602.45	55,764.80	.58	119,945	91,100.95	56,910.75	.62
S01123	HEATHERLUBE RG	626,232	471,076.34	265,212.51	.56	553,780	414,755.45	218,900.21	.53
S01124	STATIC NIL CASES	44	1,980.00	605.53	.31	55	2,475.00	755.97	.31
S01125	OLIVE SUB 12A	4,365	5,238.00	2,474.97	.47				
S01128	TOPSOL RSC/346	40,080	16,032.00	8,130.23	.51	15,840	7,444.80	3,033.68	.41
S01133	TOPSOL RSC BASE	44,599	24,306.44	20,324.25	.84	33,774	18,406.82	14,913.45	.81
S01138	LUROL 1852	8,360	10,032.00	4,984.35	.50				
S02105	LUROL 51					780	421.20	310.99	.74
S02110	LUROL 77/LUROL 71	197,637	100,972.05	59,787.60	.59	248,437	124,274.94	73,686.91	.59

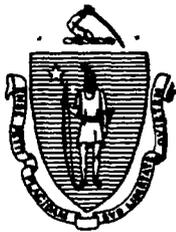
AS OF 8/31/85

PART NO.	DESCRIPTION	C U R R E N T				L A S T			
		QTY	VALUE	Y T D	X	QTY	VALUE	Y T D	X
S02125	LURQL 255	3,600	1,620.00	1,464.68	.90	2,000	900.00	785.38	.87
S02143	LURQL 283	29,450	20,625.37	11,414.41	.55	36,000	25,110.00	14,982.18	.60
S02147	LURQL 260-A	3,510	2,246.40	1,196.63	.53	9,810	5,994.90	3,298.31	.55
S02166	LURQL 1689(SEE S0217	430	322.50	191.05	.59				
S04158	LURQL NR-225	800	840.00	505.30	.60	435	456.75	275.40	.60
S05106	LURQL PP-1760	71,280	82,737.60	42,431.69	.51				
S06102	GLOBE LB-585	2,664	3,996.00	3,620.40	.91	13,653	20,820.83	18,846.10	.91
S06103	GLOBE LS-921					2,960-	2,619.60-	2,279.82-	.87
S07110	MILUBE 1782	1,278	1,776.42	651.34	.37				
S09101	LURQL FP-912	880	1,161.60	497.09	.43	440	506.00	271.94	.54
S12002	LURQL TF-165					36	54.00	50.56	.94
S12003	LURQL TF-748M					2,380	7,140.00	5,230.53	.73
S12011	LURQL TF-1567	1,200	3,420.00	2,704.28	.79				
S13001	LUREEN 48M	1,497	812.74	366.99	.45	1,895	1,010.03	463.70	.46
S13013	LUREEN 330	1,760	2,710.40	1,939.20	.72	1,750	2,415.00	1,653.80	.68
S13999	GENERAL MISCELLANEOU	10,520	11,100.86	6,449.19	.58	40	582.06-	304.19	.52-
S14101	MILUBE A-24					43	48.16	30.71	.64
S14105	MILUBE A-89	20,000	10,400.00	3,930.66	.38	21,600	11,232.00	4,294.08	.38
S14112	MILUBE N-34	400	356.00	261.43	.73				
	TOTALS ***	3,966,789	2,112,296.93	1,222,946.99	.58	4,375,769	2,254,887.40	1,270,429.30	.56

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Attachment 4

Waste Survey and April 23, 1983 Commonwealth Notice



The Commonwealth of Massachusetts
Executive Office of Environmental Affairs
Department of Environmental Quality Engineering

Southeast Region

Lakeville Hospital, Lakeville, Massachusetts 02346

947-1231, Ext. 680-684

April 21, 1983

ANTHONY D. CORTESE Sc. D
 Commissioner

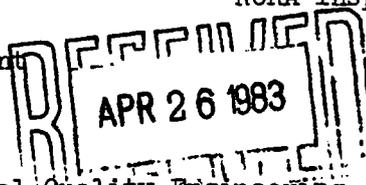
PAUL T. ANDERSON
 Regional Environmental Engineer

George A. Goulston Co.
 1000 Crescent Blvd.
 Scituate, Massachusetts 02066

RE: SCITUATE--Hazardous Waste--
 George A. Goulston Co.,
 1000 Crescent Blvd., Scituate,
 RCRA Inspection, Site ID #MAD066619214

ATTENTION: Arnold Goulston
 Executive Vice President

Gentlemen:



The Department of Environmental Quality Engineering, on April 8, 1983, inspected your facility located at 1000 Crescent Blvd., Scituate, Massachusetts. The purpose of this inspection was to determine the status of your facility relative to compliance with the Hazardous Waste Regulations contained in 310 CMR 30.000 and 40 CFR 260-265.

The inspection revealed that the George Goulston Co. does not generate a hazardous waste.

Please be advised that no person who generates or otherwise comes into possession of hazardous waste shall transfer custody or possession of such waste to any person who does not have a valid hazardous waste license and that a properly prepared manifest must accompany such waste.

If you have any questions, please contact Andrea Sewall of this office.

Very truly yours,

For the Commissioner

Robert E. Donovan,
 Deputy Regional Environmental Engineer

D/AS/pd

cc; Kenneth M. Bates
 Hazardous Waste Coordinator
 Dept. of Public Works
 161 Driftway
 Scituate, Mass. 02066

~~We have no information of wastes generated.~~ See attached letter from the Department of Environmental Quality Engineering dated April 8, 1983.

ENCLOSURE E-WASTE SURVEY

Name of Respondent: Goulston Technologies, Inc. Respondent's Location: Monroe, NC Date: 2/19/04

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).
Acids				
Adhesives				
Asbestos				
Adsorbents (from spills, leaks, etc.)				
Automotive Related Wastes:				
Antifreeze				
Batteries				
Brake Fluids				
Degreasers				
Lubricants				
Oils				

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).
Oil Filters				
Transmission fluids				
other:				
Batteries				
Bleaches				
Caustics/Alkalis				
Chemicals				
Cleaning compounds or fluids				
Coolants				
Degreasers				
Disinfectants				
Distillation Byproducts (Still Bottoms)				
Dyes				
Etching Solutions				
Filters				

	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).
	Flammable, Reactive, or Explosive Materials				
	Fungicides				
	Herbicides				
	Insecticides				
	Insulating/Fire Proofing Materials				
	Laboratory Wastes				
	Lubricants				
	Metals:				
	grindings				
	powders				
	shavings				
	sludges				
	solutions				
	other:				
	Paint and Coating 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).
paint				
pigments				
stripper				
stains				
thinner				
turpentine				
varnish				
other:				
PCBs (polychlorinated biphenyls)				
Pesticides				
Photocopying Wastes:				
toners				
other:				
Photography Wastes:				
developers				
fixers				

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).
other:				
Plating Solutions				
Pretreatment Sludges/Solutions (sewage)				
Printing Wastes:				
inks				
dyes				
other:				
Rags, Used (Indicate prior use)				
Rodenticides				
Septic System Wastes				
Sludges				
Soldering Solutions				
Solutions of Polymers, resins, plastics				
Solvent Extracts				

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).

Attachment 5

Summary of Shipments to Whitney Barrel

SUMMARY OF SHIPMENTS TO WHITNEY BARREL QUESTION 7 OF RFI

Customer/ Location	Invoice Number	Quantity	Price	Shipment Value	Shipment Date
Whitney Barrel-Woburn, MA	18665	120	\$4.00	\$480.00	01/02/1980
Whitney Barrel-Woburn, MA	18852	143	\$4.00	\$572.00	04/18/1980
Whitney Barrel-Woburn, MA	18927	133	\$4.00	\$532.00	06/13/1980
Whitney Barrel-Woburn, MA	18927	10	\$1.00	\$10.00	06/13/1980
Whitney Barrel-Woburn, MA	19021	69	\$4.00	\$276.00	08/22/1980
Whitney Barrel-Woburn, MA	19021	74	\$1.00	\$74.00	08/22/1980
Year end 08/80		549		\$1,944.00	
Whitney Barrel-Woburn, MA	19139	86	\$1.00	\$86.00	10/31/1980
Whitney Barrel-Woburn, MA	19139	57	\$4.00	\$228.00	10/31/1980
Whitney Barrel-Woburn, MA	19232	96	\$1.00	\$96.00	12/29/1980
Whitney Barrel-Woburn, MA	19232	31	\$4.00	\$124.00	12/29/1980
Whitney Barrel-Woburn, MA	19302	96	\$1.00	\$96.00	02/10/1981
Whitney Barrel-Woburn, MA	19302	47	\$4.00	\$188.00	02/10/1981
Whitney Barrel-Woburn, MA	19436	76	\$1.00	\$76.00	04/22/1981
Whitney Barrel-Woburn, MA	19436	32	\$4.00	\$128.00	04/22/1981
Whitney Barrel-Woburn, MA	19563	75	\$1.00	\$75.00	06/26/1981
Whitney Barrel-Woburn, MA	19563	66	\$4.00	\$264.00	06/26/1981
Whitney Barrel-Woburn, MA	19585	-75	\$1.00	-\$75.00	07/16/1981
Whitney Barrel-Woburn, MA	19585	-66	\$4.00	-\$264.00	07/16/1981
Whitney Barrel-Woburn, MA	19586	99	\$1.00	\$99.00	07/16/1981
Whitney Barrel-Woburn, MA	19586	42	\$4.00	\$168.00	07/16/1981
Whitney Barrel-Woburn, MA	19611	105	\$1.00	\$105.00	08/04/1981
Whitney Barrel-Woburn, MA	19611	31	\$4.00	\$124.00	08/04/1981
Year end 08/81		798		\$1,518.00	
Whitney Barrel-Woburn, MA	19735	90	\$1.00	\$90.00	10/09/1981
Whitney Barrel-Woburn, MA	19735	35	\$4.00	\$140.00	10/09/1981
Whitney Barrel-Woburn, MA	19838	39	\$4.00	\$156.00	12/17/1981
Whitney Barrel-Woburn, MA	19838	68	\$1.00	\$68.00	12/17/1981
Whitney Barrel-Woburn, MA	19950	40	\$40.00	\$160.00	02/19/1982
Whitney Barrel-Woburn, MA	19950	86	\$1.00	\$86.00	02/19/1982
Whitney Barrel-Woburn, MA	20179	209	\$1.00	\$209.00	07/01/1982
Whitney Barrel-Woburn, MA	20192	118	\$4.00	\$472.00	07/19/1982
Whitney Barrel-Woburn, MA	20192	89	\$1.00	\$89.00	07/19/1982
Year end 08/82		774		\$1,470.00	
Whitney Barrel-Woburn, MA	20667	168	\$1.75	\$294.00	05/16/1983
Year end 08/83		168		\$294.00	

Attachment 7

Declaration

WELLS G & H

ENCLOSURE H - DECLARATION

I declare under penalty of perjury that I am authorized to

respond on behalf of Goulston Technologies, Inc. and that the
Respondent

foregoing is complete, true, and correct.

Executed on Feb. 12, 2004



Signature

Roger J. Crossfield

Type Name

President

Title [if any]

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

* * * * *
* Period Being Investigated: 1950 to 1985 *
* * * * *

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

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

The Site: For the purposes of this Information Request letter, as set forth in the Definitions of Enclosure C (Item 7), Site shall refer to the Wells G & H Superfund site in Woburn, MA.

QUESTIONS

1. General Information About Respondent

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

- a. Provide the full legal name and mailing address of the Respondent.
- b. For each person answering these questions on behalf of Respondent, provide:
 - i. full name;
 - ii. title;
 - iii. business address; and
 - iv. business telephone number.
- c. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including any legal notices, please so indicate here by providing that individual's name, address, and telephone number.
- d. Provide the names of all Superfund sites in Region I (New England) for which Respondent has received a 104(e) Request for Information Letter from EPA.

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

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.

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.

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.

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.

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.

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.

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.

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.

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

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

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.

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 spills;
- iii. the methods used to clean up those spills; and
- iv. where the materials used to clean up those spills were disposed of.

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

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.

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.

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.

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.

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

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.

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.

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.

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.

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

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.

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.
- f. For each type of waste describe Respondent's contracts, agreements, or other arrangements for its disposal, treatment, or recycling.
- g. Provide copies of such contracts and other documents reflecting such agreements or arrangements.
- h. State where Respondent sent each type of its waste, including barrels and empty barrels, for disposal, treatment, or recycling.
- 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).
- 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.

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.

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

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

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

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

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 seq., (TSCA); Emergency Planning and Community Right-to-Know Act, 42 U.S.C. §§ 1101 et seq., (EPCRA); and the Clean Water Act (the

Water Pollution Prevention and Control Act), 33 U.S.C. §§ 1251 et seq. and equivalent state law.

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.

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.

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);
- 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.

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 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.

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.

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.

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.

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.

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

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.

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.

b. If not already included in your response, if you have reason to believe that there may be persons, including persons currently or formerly employed by Respondent, who are able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.

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

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.