

US EPA ARCHIVE DOCUMENT

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Service must be marked on airbill

VTBS

FedEx Service



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FedEx First Overnight®

FedEx

FedEx | Ship Manager | Label 7901 7075 0310

From: Origin ID: (612)375-7359
Aimee Stevens
The Valspar Corporation
1101 South Third Street

Minneapolis, MN 55415



Ship Date: 29SEP05
Actual Wgt: 1 LB
System#: 3895559/NET2200
Account#: S *****

REF: 000117000000706970000907



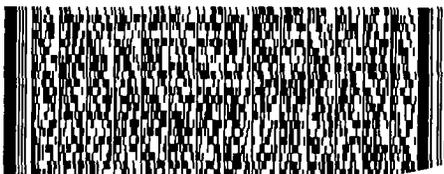
Delivery Address Barcode

SHIP TO: (617)918-1407

BILL SENDER

Martha Bosworth
U.S. EPA
One Congress Street, Suite 1100

Boston, MA 02114



FIRST OVERNIGHT

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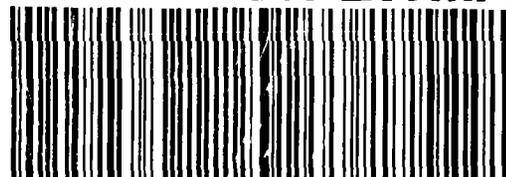
FORM 0201

Deliver By:
30SEP05

BOS A1

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**UPDATE ALL INFO
POD INTO COS

- Incorrect recipient address/incomplete recipient address
- Need apartment or suite number
- Recipient moved and left no forwarding address or phone number
- Not in / Business closed / Not authorized to leave shipment without a signature
 - 1st Attempt
 - 2nd Attempt
 - 3rd Attempt
- Signature required, please contact shipper for disposition
- Holiday - Closed
- Package not attempted (reason): _____
- Refused (reason): _____
- Future delivery. Reattempt on (date): _____
- Recipient requested hold for pickup
- Collect on Delivery. Payment not available. Reattempt to be made on (date): _____
- Bill recipient shipment, Payment not available. Reattempt to be made on (date): _____
- Other: _____

Date: _____ Employee #: _____

POD MUST BE OBTAINED WHEN DELIVERY IS COMPLETED.

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FEDEX DELIVERY
M-0205 01/01 WCS

0052-0359



SDMS DocID

283459



Ronda P. Bayer
Associate General Counsel

1101 South Third Street, Minneapolis, MN 55415
612-375-7306 FAX 612-375-7313

Superfund Record:
SITE: Wells G & H
PROJECT: 11.7
OTHER: 083459

September 29, 2005

Via Overnight Courier

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

Attn: Wells G&H Case Team

RE: Supplemental 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 Ms. Bosworth:

Enclosed please find Samuel Cabot Incorporated's response to the above request. Please
direct any questions or future inquiries to me at the above address.

Very truly yours,

Ronda P. Bayer

Enclosure

US EPA ARCHIVE DOCUMENT

**RESPONSE OF SAMUEL CABOT INCORPORATED (“RESPONDENT”) TO
SUPPLEMENTAL REQUEST FOR INFORMATION IN RELATION TO THE
FORMER WHITNEY BARREL COMPANY AT THE
WELLS G & H SUPERFUND SITE IN WOBURN, MASSACHUSETTS**

General Questions Regarding Respondent’s Operations

QUESTION NO. 1:

Identify any equipment that was removed during the dismantling of the Chelsea facility in 1979. For each piece of equipment removed, please describe the removal process, including:

- a. The names of all contractors and/or companies who removed the equipment;
- b. The names of all contractors and/or companies who cleaned the equipment prior to removal;
- c. The waste(s) generated as a result of the equipment removal and cleaning processes;
- d. Where these wastes were disposed of;
- e. How the equipment was transported from the facility after removal; and
- f. Where the equipment was taken after the dismantling.

RESPONSE NO. 1:

Unknown. The Chelsea facility was operating in 1979. According to the prior response, a still operation was dismantled in 1979. The removal process is unknown. The Chelsea facility was operating until 1985. All documents were produced with Respondent’s prior response.

Respondent sold the Chelsea facility in 1988 on an “as is” basis. Except for the manufacturing equipment that was moved to Respondent’s Newburyport location, Respondent did not dismantle the Chelsea facility.

QUESTION NO. 2:

Were any containers removed from the Chelsea facility as part of the facility closure process? Unless your response is an absolute “No,” please provide:

- a. The name of the company or individual who removed the containers;
- b. The dates of each pickup;
- c. The number of containers;
- d. The type(s) of containers;
- e. The size(s) of the containers;
- f. The condition of each container;

- g. 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 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;
- h. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
- i. A description of how Respondent disposed of any emptied materials and/or rinse water; and
- j. Any documentation or additional information related to these transactions.

RESPONSE NO. 2:

Unknown. All documents were produced with Respondent’s prior response.

Respondent sold the Chelsea facility in 1988 on an “as is” basis. Except for the manufacturing equipment that was moved to Respondent’s Newburyport location, Respondent did not dismantle the Chelsea facility. The Chelsea closure process was not performed by Respondent.

QUESTION NO. 3:

Describe your handling and disposal practices for leaking and/or defective containers, including:

- a. How you handled and disposed of the leaking raw material and/or waste material;
- b. The names of each contractor, company, and/or facility used to dispose of the leaking raw material and/or waste material;
- c. The names of each contractor, company, and/or facility used to dispose of these defective containers; and
- d. Please include any documentation or additional information related to these transactions.

RESPONSE NO. 3:

Respondent’s practices for the period being investigated are unknown.

QUESTION NO. 4:

In your 104(e) response, you provided a Coastal Services, Inc. Daily Job Report indicating that Coastal Services, Inc. “industrial” cleaned one of Samuel Cabot’s tanks to remove “sludge, oil and water for disposal.” Please describe Respondent’s procedures for tank cleaning and maintenance, including:

- a. Whether “industrial” cleaning of your tanks was a routine practice;
- b. How often Respondent’s tanks were cleaned;
- c. The names and street addresses of all contractors and/or companies who provided tank cleaning services to Samuel Cabot;
- d. The location where the tanks were cleaned (i.e., at Respondent’s facility or sent to the outside contractor or company’s facility); and
- e. How Respondent disposed of any materials removed from the tanks and/or rinse water.

RESPONSE NO. 4:

Respondent’s procedures for the period being investigated are unknown. The document indicates the wastes were disposed of pursuant to Manifest #MA 2209.

Information Concerning Respondent’s Association with Whitney Barrel

QUESTION NO. 1:

Please identify each Samuel Cabot facility which had a relationship with Whitney Barrel.

RESPONSE NO. 1:

To the best of Respondent’s knowledge, none.

QUESTION NO. 2:

For each shipment of used containers to Whitney Barrel, please provide:

- a. The dates of each pickup and delivery;
- b. The number of containers;
- c. The type(s) of containers;
- d. The size(s) of the 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 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;
- g. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
- h. A description of how Respondent disposed of any emptied materials and/or rinse water; and
- i. Any documentation or additional information related to these transactions.

RESPONSE NO. 2:

Not applicable.

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

QUESTION NO. 1:

State whether Samuel Cabot sent/delivered containers to any other drum reconditioning/recycling company, including but not limited to, Edward C. Whitney & Son, Inc. (also known as E.C. Whitney), 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, and Woburn Barrel.

RESPONSE NO. 1:

To the best of Respondent's knowledge, barrels were picked up by American Barrel of Chelsea, Massachusetts.

QUESTION NO. 2:

For each of the above companies, please identify:

- a. How frequently Respondent sent/delivered containers;
- b. 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 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;
- c. A description of the process Respondent used to empty, rinse, and/or clean the containers prior to pick-up/delivery;
- d. A description of how Respondent disposed of any emptied materials and/or rinse water;
- e. The volume (i.e., number of containers, size of each container, and volume of waste associated with each container) of containers sent/delivered by Respondent;
- f. The time period during which containers were sent/delivered by the Respondent;
- g. All of the employees who transported containers from the Respondent's facility(ies); and
- h. Provide any documentation or additional information related to these transactions.

RESPONSE NO. 2:

Unknown.

Compliance with this Request**QUESTION NO. 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.

RESPONSE NO. 1:

**Brian Lavelle, Accounting Manager/Controller
John Anderson, Vice President of Manufacturing**

Respondent reviewed its prior responses for both this site and its 1994 response for the Turchin Junkyard site. In addition, Respondent consulted Samuel Cabot Incorporated's former counsel, Victor N. Baltera, of the law firm Sullivan & Worcester, One Post Office Square, Boston, Massachusetts 02109, Phone: (617) 338-2800. Mr. Baltera assisted with Respondent's prior response. Respondent conducted an additional records search at its Newburyport facility, but found no documents in addition to those produced with the prior response. The Newburyport facility is Respondent's only location.