

US EPA ARCHIVE DOCUMENT



April 28, 2004

Elisabeth DeLisle
Boston Office
617.832.3056

By Hand

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

Re: ATTN: Wells G&H Case Team

Dear Ms. Bosworth:

Enclosed please find the response of W.R. Grace & Co.-Conn. to U.S. EPA's Request for Information regarding Whitney Barrel Company, Woburn, Massachusetts. Please feel free to contact me or Seth Jaffe with any questions. Seth can be reached at (617) 832-1203.

Sincerely,



Elisabeth DeLisle

EMD
Enclosures
cc: Seth Jaffe

RESPONSE OF W.R.GRACE & CO.-CONN. TO
U.S. EPA'S REQUEST FOR INFORMATION REGARDING
WHITNEY BARREL COMPANY, WOBURN, MASSACHUSETTS
April 27, 2004

W.R.Grace & Co.-Conn. ("Grace") submits this response to the United States Environmental Protection Agency's ("EPA's") request for information in relation to the former Whitney Barrel Company ("Whitney Barrel") at the Wells G&H Superfund Site in Woburn, Massachusetts (the "Request"). In attempting to respond to each of the EPA's questions, Grace has made a diligent effort to locate documents in its files and obtain information about this matter from current employees.

In the four New England States covered by the Request, Grace operated twenty-nine facilities during portions of the relevant time period, and manufactured hundreds of different products. All but one of those facilities are closed or have been sold to other entities not in Grace's control. During the relevant time period, operations at these facilities changed, products varied, and in several instances Grace ceased operations at the facilities entirely.

Grace's extensive search of previously provided and newly reviewed documents, as well as its current and past interviews of employees, has identified nearly fifty waste haulers and waste disposal facilities used by the Grace facilities during the time period being investigated. But not one Grace facility ever identified Whitney Barrel as a facility to which wastes from Grace were routinely sent. Grace was able to locate a small number of documents indicating that it had transacted business with Whitney Barrel. Based on this investigation, it appears that one Grace facility may have sent used barrels to the Whitney Barrel Company on at least one occasion.

Information previously provided to EPA. In past years, EPA has requested, and Grace has provided, information relating to many of Grace's facilities in the relevant states in connection with other Superfund sites. Therefore, these facilities have previously responded to requests for information regarding many of the same areas covered by the present request for information. The specific Superfund sites for which Grace facilities have provided information to EPA in the past are listed in response to Item 1(d).

The EPA has also previously obtained extensive information relating to the manufacturing and waste disposal practices of several of Grace's New England facilities through discovery in the matter of United States v. Charles George Trucking Co. et al. (Civil Action No. 85-2714-WD). In addition, Grace has previously provided the EPA and the Massachusetts Department of Environmental Protection with numerous studies concerning waste practices at various facilities. As a result, the Agency already has in its possession extensive information regarding waste disposal practices at many of the facilities operated in the covered states during the relevant time period. Grace hereby incorporates by reference into this response all such information and all objections previously made. The agency has copies of the documents previously provided and therefore Grace has simply referenced specific documents when referring to them in this Response.

Current document review and interviews. In addition to relying on information previously provided to the Agency, Grace undertook a thorough search for documents containing information responsive to the Request. In gathering responsive information, Grace reviewed the following: telephone directories; corporate transaction files located in Cambridge, MA and Columbia, MD; files located in Memphis, TN; accounting files located in dead storage in Woburn, MA; accounts payables, vendor lists, invoices, and other business document files related to the relevant facilities located in dead storage in Cambridge, MA and offsite storage; and various documents relating to the case of Anderson v. Cryovac (Civil Action No. 82-1672-S). Grace has provided, as Exhibits to this Response, copies of all non-privileged documents located by Grace which contain non-cumulative information responsive to the Request. As most of these documents contain information responsive to multiple items of the Request, Grace has not specifically identified the numbers of the questions to which they respond. In certain cases the only information located on particular facilities was from time periods either prior to Grace's ownership of the facilities or outside of the relevant time period. Grace has, in some cases, included such information in order to provide the Agency with general information regarding the facilities. However, Grace cannot confirm that such materials accurately reflect the operations of any facilities subject to this request during Grace's ownership and the relevant time period.

Grace also conducted initial interviews with eighteen current Grace employees who were employed by Grace at the relevant facilities during the time period covered by the Request, as well as follow up interviews with those employees where appropriate. Grace believes that it is unduly burdensome for EPA to require Grace to interview former employees where Grace has no particular reason to think that those former employees have relevant information. Therefore, in responding to the Request, Grace has conducted interviews with former employees only in instances in which Grace had reason to believe that the individuals may have particular information relevant to the Request.

Request for any alleged nexus documents. Because of the scope of operations carried out by Grace during the relevant time period, in an attempt to focus its investigation, Grace requested that EPA identify the alleged link between Grace and the Whitney Barrel Company which resulted in the Agency's issuance of its information request. To date, EPA has not released any documents reflecting the basis for its request, notwithstanding that, since at least 1993, it has been EPA policy voluntarily to release such documents, even if they might be subject to an exemption under FOIA. Grace notes that EPA's refusal to release these documents has hindered Grace's ability to conduct a focused, effective search for relevant information. Grace therefore restates its request that EPA promptly provide Grace with any information it may have that would tend to indicate that Grace arranged for the disposal of any hazardous substances with Whitney Barrel.

Objections. Given the Company's normal document retention procedures, the inherent limitations of the human memory in recollecting events that happened from twenty to fifty years ago, the lengthy time frame covered by the Request, and the complexity of Grace's operations during that time frame, Grace cannot provide definitive answers to all of the EPA's many detailed questions. In view of these limitations, Grace objects to any question to the extent that it requires Grace to speculate or seek information not in its possession, custody or control. Grace objects in general to the Request on the ground that many of the specific requests are irrelevant, overbroad, vague and impose an undue burden on the respondent. The nature of Grace's specific

objections are set forth more fully below. Notwithstanding, and without waiving said objections, Grace has endeavored to respond to the request to the extent of the information available to it, except where noted.

Miscellaneous. In providing the information in this response, Grace is making no admission of liability with respect to the Site under any statute or common law. Grace reserves the right to correct any misimpressions or erroneous assumptions by the EPA in the Agency's consideration of Grace's response.

It is Grace's intent to cooperate with the EPA on this matter and if the agency has further questions or requests for clarification based on this submission, the Company asks that EPA contact it to discuss how EPA's information needs can be adequately addressed without requiring the generation of irrelevant and unduly burdensome information by Grace.

The answers set forth herein, subject to inadvertent or undiscovered errors or omissions, are based on and therefore necessarily limited by the records and information currently in the possession of and retrievable by Grace or recollected by current employees of Grace. Grace reserves the right to supplement or revise any response herein to reflect any additional relevant information obtained.

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.*
- W.R. Grace & Co.-Conn.
- 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.*

William M. Corcoran
Vice President, Public and Regulatory Affairs
W.R.Grace & Co.-Conn.
7500 Grace Drive
Columbia MD 21044
410-531-4203

Lydia B. Duff
Senior Environmental Counsel
Legal Services Group
7500 Grace Drive
Columbia, MD 21044
410-531-4210

- c. *If Respondent wishes to designate an individual for all future correspondence concerning the Site, including any legal notices, please so indicate here by providing that individual's name, address, and telephone number.*

Seth D. Jaffe
Foley Hoag LLP
155 Seaport Boulevard
Boston, MA 02210
617-832-1203

- 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.*

Auburn Road Landfill
Cannons Engineering
Cook's Landfill
Silresim

**Charles George Landfill
Landfill, Resource, and Recovery
Solvents Recovery Service
Keefe Environmental Services
Re-Solve Hazardous Waste Facility
South Street (Multibestos)
Shaffer Landfill**

2. **Respondent's Legal Status**

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

Grace objects to this question for vagueness. The EPA's Request for Information is addressed to "W.R.Grace," which is not an existing corporate entity. This response is submitted on behalf of W.R.Grace & Co.-Conn., a Connecticut corporation and owner of W.R. Grace & Co.'s primary business operations in the United States.

- 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.*

W.R.Grace & Co., a Connecticut corporation, was incorporated in 1899 in Connecticut. In 1988, it was renamed W.R.Grace & Co.-Conn.

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

See response to Item 2(a). Corporation Services Company, 50 Weston Street, Hartford CT 06120-1537 is the 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.*

Not applicable.

- 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.*

W.R. Grace & Co.-Conn. is a wholly owned subsidiary of W. R. Grace & Co., a Delaware corporation, and has been such since 1988.

W.R.Grace & Co. locates its corporate headquarters at 7500 Grace Drive, Columbia, MD 21044.

- 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.*

See Response to Item 2(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.*

See Response to Item 2(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.*

W.R. Grace & Co.-Conn. and certain of its affiliates filed for Chapter 11 Reorganization under the U.S. Bankruptcy Code on April 2, 2001, in the United States Bankruptcy Court for the District of Delaware, and these cases have been consolidated for administrative purposes only under Case No. 01-1139. Pursuant to Sections 1107(a) and 1108 of the Bankruptcy Code, Grace continues to operate its businesses and manage its properties as debtors in possession.

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.*

Since the request specifically excludes facilities engaged solely in clerical or office work Grace therefore is not responding with respect to sales or administrative offices. In addition, Grace owned a number of retail operations during the relevant time period. To respond with respect to such facilities would significantly increase the already substantial burden of responding to this Request, without any real possibility of providing EPA with relevant information. Therefore, and based on conversations with EPA personnel, Grace will not respond with respect to retail facilities. Instead, Grace has included in its response only those facilities at which Grace's operations included manufacturing, laboratory, and/or warehouse facilities.

Subject to these limitations, Grace believes, to the best of its knowledge and after diligent search, that during the relevant time period Grace carried out its operations at the following facilities:

1. 50 Independence Rd.
Acton, MA
2. Harmony Street
Adams, MA
3. 21 Ramah Cir.
Agawam, MA
4. YD Road
Bedford, MA
5. North Billerica, MA
6. 9 Linnell Circle
Billerica, MA
7. 50 Business Street
Boston, MA
8. 62 Whittemore Avenue
Cambridge, MA
9. 869 Washington Street
Canton, MA
10. 59 Walpole Street
Canton, MA

11. Cherry Hill Drive
Danvers, MA
 12. Wemelco Way
Easthampton, MA
 13. Sea Pak
Rogers Street
Gloucester, MA
 14. Off Shore Fisheries
P.O. Box 221
Gloucester, MA
 15. 50 Island Street
Lawrence, MA
 16. 25 Hartwell Avenue
Lexington, MA
 17. 55 Hayden Avenue
Lexington, MA
 18. Foot of John Street
Lowell, MA
 19. 33 Hayes Memorial Drive
Marlboro, MA
 20. 380 South Street
Plainville, MA
 21. 369 Washington Street
Woburn, MA
 22. 61 Holton Street
Woburn, MA
 23. Dragon Court /Commonwealth Avenue Building Complex
Woburn, MA
 24. 54 Rockdale Street
Worcester, MA
 25. 1060 Millbury Street
Worcester, MA
 26. 16-18 Flagstone Drive
Hudson, NH
 27. Poisson Avenue
Nashua, NH
 28. U.S. Highway 1
Searsport, ME
 29. Address Unknown
Taunton MA
- 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.*

The following responses are based on the best available information at this time, based on review of documents and interviews of employees. However, the information provided may not reflect operations of facilities at all times throughout the relevant 35 year period.

1. Acton Facility

Grace has previously provided EPA with extensive information regarding the operations, types of work performed, and types of products manufactured, recycled, recovered, treated or otherwise processed at the Acton Facility. Grace provided EPA with information responsive to this Item 3(b) in its Report submitted to the Director, Enforcement Division, of U.S. EPA on November 12, 1980, its December 9, 1988 response regarding Auburn Road Landfill and the attachments thereto, and its March 15, 1989 response regarding Charles George Reclamation Trust and the attachments thereto. Grace has also provided substantial documentation concerning the Acton Facility to EPA in connection with its ongoing remedial activities at the Acton Facility. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

In brief, Grace states that the Acton Facility operated as part of the Dewey and Almy, Organic Chemical, and Polyfibron business units. Dewey and Almy acquired the facility in 1945. The Dewey and Almy Chemical Division manufactured container sealing compounds at the Acton Facility through 1976. Additionally, cellulosic battery separators were manufactured to supply lead/acid battery manufacturers. A third line of products manufactured was a group of organic polymer resins made and sold to the adhesive and paint industry by the Organic Chemical Division of Grace. In 1979, a new plant for the DARAMIC plastic battery separator operation was built on the Acton property. At some time prior to 1983, the Organic Chemical operations were shut down or moved and the Construction Products Division's concrete additive operation later occupied some of the building vacated by the Organic Chemical operations and began operating at the Acton Facility. Although Grace currently owns the Acton Facility, it does not currently conduct any manufacturing operations at the Acton Facility.

2. Adams facility

Grace has previously provided the Agency with information regarding the operations, types of work performed, and types of products manufactured, recycled, recovered, treated or otherwise processed at the Adams Facility. Grace provided EPA with information responsive to this Item 3(b) in its March 15, 1989 response regarding Charles George Reclamation Trust and its January 14, 1993

response regarding Solvents Recovery Services of New England (SRSNE). Grace hereby incorporates by reference all such information responsive to this Item of the Request. In addition, Grace refers to the documents attached hereto as Exhibit 1.

The Adams facility operated as part of the Polyfibron business unit. Grace acquired the facility as part of the Dewey and Almy business in 1954 and operated it through the end of the relevant period. Based on information Grace located regarding Grace's acquisitions and dispositions of property, Grace sold the Adams Facility in 1994. The Adams Facility manufactured a variety of polymer-fiber blankets for offset and letterpress printing equipment serving commercial, newspaper, business forms and textile markets. On information and belief, the process used to manufacture these products involved mixing solvents and filler in a Banbury mixer to form a liquid rubber which was then used to coat a paper or fabric backing, producing rolls of printing blankets. The rolls were then built up or sanded down and cut according to customer specifications. Currently, Grace neither owns nor conducts business at the Adams Facility.

3. Agawam Facility

Grace refers to the documents attached hereto as Exhibit 2. Grace states that the Agawam Facility was operated as a manufacturing and office facility of the Emerson & Cuming business unit. The property was acquired March 5, 1985 when Emerson & Cuming purchased the property. Grace sold the Agawam Facility three years later in 1988. The Agawam Facility fabricated products from fiberglass and related composite materials. Operations involved molding, finishing and painting products composed generally of resins and hardeners. The Facility also fabricated and cut fiberglass and graphite composite cloth. The Facility included office, laboratory, manufacturing, and maintenance areas. Currently, Grace neither owns nor conducts business at the Agawam Facility.

4. Bedford Facility

Grace refers to the documents attached hereto as Exhibit 3. In brief, Grace states that from approximately 1966 through 1969, Grace leased from Mr. Alfred Iodice 2500 square feet of warehouse space in a building on YD Road, in Bedford MA. The Bedford Facility was operated as part of the Construction Products Division business unit. Grace maintained the space as a wholesale and retail operation for the pickup and delivery of concrete admixtures and coatings. No manufacturing occurred on the premises. The admixtures and coatings were chemical liquids utilized by the construction industry to control the water and air content of concrete, the hardening time and other characteristics, or to cover newly constructed surfaces. Grace maintained a floor tank on the premises for inventory of products sufficient for one or two days' requirements of customers. There was also a stock of 55-gallon drum material and 5-gallon pail material for pickup and delivery to customers. Additionally, Grace maintained an inventory of replacement mechanical parts such as small electrical motors, pumps, etc., used in

the normal course of daily business. Grace has identified no additional information regarding the Bedford Facility. Currently, Grace neither owns nor conducts business at the Bedford Facility.

5. North Billerica Facility

Grace refers to the documents attached hereto as Exhibit 4. The North Billerica Facility was operated as part of the Construction Products Division business unit. Based on information Grace located regarding Grace's acquisitions and dispositions of property, Grace states that it acquired the North Billerica Facility in 1963 and sold the Facility in 1964. Thus, Grace owned the Facility for only a short time during the relevant time period. The North Billerica Facility operated as part of the Zonolite Company and produced a vermiculate product named Terra-Lite, which was manufactured for use in gardening applications. Grace has identified no additional information regarding the North Billerica Facility. Currently, Grace neither owns nor operates the North Billerica Facility.

6. Billerica Facility

Grace refers to the documents attached hereto as Exhibit 5. The Billerica Facility was leased by the Amicon business unit in 1984. Amicon-Polymer Products Division, which during a reorganization became part of Emerson and Cuming, Inc., used the facility to manufacture conductive inks, coatings and adhesives used in the electronics industry. Amicon vacated the property in 1986, when, on information and belief, Grace entered into an agreement to sublease the property to Hyperion Catalysis International in 1986. The lease was terminated effective as of September 30, 1988. Currently, Grace neither owns nor operates the Billerica Facility.

7. Boston Facility

Grace refers to the documents attached hereto as Exhibit 6. Based on information contained in Grace's 1966 Product Guide, the Boston Facility operated as part of the Dearborn Chemical Division business unit. The Dearborn Chemical Division manufactured and marketed industrial water treatment chemicals, maintenance and production coatings, pipeline coatings, wrappers and transportation cleaners. The 1966 Product Guide indicates that the Boston Facility produced cleaners, maintenance coatings, pipeline coatings, pipeline wrappers, and production coatings. The Boston Facility was also listed in Grace's 1968 Product Guide. Grace has identified no additional information regarding the Boston Facility. Currently, Grace neither owns nor operates the Boston Facility.

8. Cambridge Facility

Grace has previously provided EPA with extensive information regarding the operations, types of work performed, and types of products manufactured, recycled, recovered, treated or otherwise processed at the Cambridge Facility. Grace provided EPA with information responsive to this Item 3(b) in its

December 9, 1988 response regarding Auburn Road Landfill and the attachments thereto, its March 15, 1989 response regarding Charles George Reclamation Trust and the attachments thereto, its June 29, 1992 response regarding Shaffer Landfill and the attachments thereto, and its April 27, 2000 response of the Cambridge Laboratories to the Third Request for Information regarding W.R. Grace Libby Asbestos Site (the "Libby Response"). Grace hereby incorporates by reference all such information responsive to this Item of the Request.

Grace states that Grace acquired the Cambridge Facility in 1954 as the result of a merger with the Dewey and Almy Chemical Company. Grace continued to operate the Cambridge Facility through the end of the relevant time period, and currently owns and operates the facility.

In brief, Grace states that the operations at the Cambridge Facility have changed a great deal over time. During Grace's ownership of the Cambridge Facility a number of major manufacturing operations, as well as numerous research and development laboratories and pilot plant facilities performing research on hundreds of products, have been operated at the facility. Employees interviewed for purposes of responding to this Request recall that headquarters and laboratory operations for certain divisions were located at the Cambridge Facility prior to being transferred to the Hayden Avenue Facility in approximately 1973. According to employees, full scale manufacturing operations, with the exception of a small machine shop, ceased at the Cambridge Facility sometime during the middle to late 1970's or early 1980's. Employees also recall that laboratory operations for certain Construction Products Division product lines were located at the facility during the mid-1980's.

Currently, the facility houses administrative offices for various business units, research facilities, and a small machine shop. The only industrial operations currently conducted at the Site are conducted in the machine shop. The machine shop produces equipment for customers that utilize Grace's FDA-approved can sealing compounds to seal food and beverage cans.

9. Canton Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 7. The Canton Washington Street Facility operated as part of the Emerson and Cuming business unit. Based on information Grace located regarding Grace's acquisitions and dispositions of property, Grace states that it acquired the Washington Street Facility in 1978 when it acquired the assets of Emerson and Cuming. Grace sold the Washington Street Facility in 1997. On information and belief, the products manufactured at the Washington Street Facility included resins and solvents for use in automotive applications, rollers for printing machines, polymer type products, adhesives used in the circuit industry and dielectric materials. Currently, Grace neither owns nor conducts business at the Washington Street Facility.

10. Canton Walpole Street Facility

Grace refers to the documents attached hereto as Exhibit 8. The Canton Walpole Street Facility operated as part of the Emerson and Cuming business unit. Based on information Grace located regarding Grace's acquisitions and dispositions of property, Grace states that it acquired the Walpole Street Facility in 1978 when it acquired the assets of Emerson and Cuming. Grace sold the Walpole Street Facility in 1995. Products manufactured at the Walpole Street Facility included syntactic foam flotation products, microwave absorber products, dielectric compound products and conductive coating products. An employee recalls that the process used to manufacture flotation products involved piping materials from bulk storage into mix vessels where the materials were mixed and the mixture used to fill molds, after which the products were cured and sold. An employee estimated that the facility employed approximately 75-80 individuals as of approximately 1982. Currently, Grace neither owns nor conducts business at the Walpole Street Facility.

11. Danvers Facility

Grace refers to the documents attached hereto as Exhibit 9. Although many of the documents are from time periods either prior to Grace's ownership of the Danvers Facility or outside of the relevant time period, Grace has included the documents to provide the Agency with general information regarding Danvers Facility operations. Grace has been unable to confirm whether the information contained in these documents accurately reflects operations at the Danvers Facility during Grace ownership of the Facility during the relevant time period. The Danvers Facility operated as part of the Amicon business unit and manufactured products included in Grace's Filtration product line. Grace states that it acquired the facility in 1983 when it acquired the stock of Amicon. Grace sold the Facility in 1996. The Facility produced three general types of membranes: ultrafiltration, microporous, and hollow fibers. The Danvers Facility also manufactured chromatographic gels. Currently, Grace neither owns nor conducts business at the Danvers Facility.

12. Easthampton Facility

Grace refers to the documents attached hereto as Exhibit 10. In brief, Grace states that the Easthampton Facility was constructed in 1963 and operated through the end of the relevant time period. Grace closed the Easthampton Facility in 1992. From the time it opened until 1969, the Easthampton Facility operated as part of the Zonolite Division of Grace's Dewey and Almy Chemical Division. In 1969, as the result of a restructuring, the Facility commenced operating as part of the Construction Product's Division of Grace's Industrial Chemical Group. The facility manufactured vermiculite based products. The products manufactured included, Monokote MK-5 Fireproofing, Zonolite Masonry Insulation, Concrete Pool Base Aggregate, Zonolite Roofing Concrete Aggregates, and various other vermiculite products.

Based on information and belief, the process for manufacturing vermiculite at the Easthampton Facility involved heating vermiculite to 2000 degrees F. Vermiculite was in some cases then mixed with other materials to produce various products. On information and belief, at some point in time the Easthampton Facility began using ground styrene in place of vermiculite in the manufacture of its Monokote product. Grace no longer conducts business at the Easthampton Facility.

13. Gloucester -- Sea-Pak

Grace refers to the documents attached hereto as Exhibit 11. Grace acquired the Sea-Pak Corporation through a merger which became effective on March 2, 1967. The facility was listed in Grace corporate directories for the years 1971 through 1977. Grace has identified no additional information regarding the Sea-Pak Facility. Currently, Grace neither owns nor conducts business at the Sea-Pak Facility.

14. Gloucester -- Off Shore Fisheries

The Off Shore Fisheries Facility was listed in Grace corporate directories for the years 1974 through 1977. Grace has identified no additional information regarding the Off Shore Fisheries Facility. Currently, Grace neither owns nor conducts business at the Off Shore Fisheries Facility.

15. Lawrence Facility

Grace refers to the documents attached hereto as Exhibit 12. In brief, Grace states that Grace acquired the business and assets of Lawrence Maid Footwear, Inc. and Superior Shoe Company on or about October 23, 1970. At approximately the same time, Lawrence Maid Footwear, Inc. conveyed to W.R. Grace through a Quitclaim Deed the property located at 50 Island Street, Lawrence, MA. Additionally, Lawrence Maid Footwear, Inc. assigned to Grace its lease relating to a portion of Floor No. 1A of 5 South Union Street, Lawrence, MA. The facility was listed in corporate directories for the years 1971 through 1978. Grace has identified no additional information regarding the Lawrence Facility. Currently, Grace neither owns nor conducts business at the Lawrence Facility.

16. Lexington Hartwell Avenue Facility

Grace has previously provided EPA with extensive information regarding the operations, types of work performed, and types of products manufactured, recycled, recovered, treated or otherwise processed at the Hartwell Avenue Facility. Grace provided EPA with information responsive to this Item 3(b) in its December 9, 1988 response regarding Auburn Road Landfill, its December 24, 1988 supplemental response regarding Auburn Road Landfill, and Amicon Grace Electronic Materials' June 29, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request. In addition, Grace refers to the documents attached hereto as Exhibit 13.

The Lexington Hartwell Avenue Facility operated as part of the Amicon business unit. Based on information Grace located regarding Grace's acquisitions and dispositions of property, Grace states that it acquired the facility in 1983 when it purchased the stock of Amicon. Amicon Grace Electronic Materials operated business at the facility from 1983 through the end of the relevant period. Grace sold the Hartwell Avenue Facility in 1997.

In brief, Grace states that operations at the facility involved research, development, manufacturing and shipping of electronic materials, composed primarily of die-attach adhesives used in the manufacturing of integrated circuits. The facility also cut epoxy tape adhesives to customer specifications, and manufactured micro-electronic grade silicone compounds. Processes involved were mixing, rolling, testing, cutting and measuring epoxy materials and silicone materials. Products manufactured were principally silver-containing and fiberglass backed epoxy adhesive resin coatings containing aluminum oxide. The production process for die-attach adhesives involved recycling and or reclamation of raw or mixed materials.

Currently, Grace neither owns nor conducts business at the Hartwell Avenue Facility.

17. Lexington Hayden Avenue Facility

Grace has previously provided EPA with extensive information regarding the operations, types of work performed, and types of products manufactured, recycled, recovered, treated or otherwise processed at the Hayden Avenue Facility. Grace provided EPA with information responsive to this Item 3(b) in its December 19, 1988 response regarding Auburn Road Landfill, Grace Specialty Chemical Co.'s March 15, 1989 response regarding Charles George Reclamation Trust, its August 1, 1989 response regarding Landfill & Resource Recovery Site, and in Dewey and Almy Division's June 26, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item.

Grace states, in brief, that the Lexington Hayden Avenue Facility operated as part of the Dewey and Almy, Polyfibron, and Organic Chemicals Division business units. Grace built the facility in 1972. The facility was operated from 1973 through the end of the relevant period. Grace sold the Hayden Avenue Facility in 1997. The Hayden Avenue Facility operated administrative offices and undertook research and development for sealants for the drum and container industry, metalworking lubricants, automotive sealants (limited to 1976 through 1986), and carbon dioxide absorbents for the medical and diving industries. The facility also performed bench scale small quantity mixing of sealants for the container industry, automotive industry, metalworking industry, and the medical industry. Employees interviewed for purposes of responding to this request recall that the headquarters of the Organic Chemicals Division, the Dewey and Almy Division, and the Polyfibron Division's Letterflex, printing blanket, and battery separator

operations, were located at the Hayden Avenue Facility. Currently, Grace neither owns nor conducts business at the Hayden Avenue Facility.

18. Lowell Facility

Grace refers to the documents attached hereto as Exhibit 14. The Lowell Facility was owned and operated as part of the Formed Plastics Group, which carried on a business for the sale of foodservice products through its Jet Containers Operation. The facility manufactured injection molded polystyrene foodservice products. Grace operated the Lowell Facility for a period of approximately three years beginning in 1971. Through an Agreement and Plan of Reorganization dated July 19, 1971, Grace acquired Jet Containers, Inc. Grace leased the Foot of John Street property pursuant to an Indenture of Lease between Boott Mills, as landlord, and Jet Containers, Inc., as lessee, dated July 1, 1971. Grace sold the manufacturing facilities and business of the Jet Containers Operation to Mobil Oil Corporation pursuant to an Agreement of Purchase and Sale dated January 11, 1974. Grace has identified no additional information regarding the Lowell Facility. Currently, Grace neither owns nor conducts business at the Lowell Facility.

19. Marlboro Facility

Grace refers to the documents attached hereto as Exhibit 15. The Marlboro Facility operated as part of the Dewey and Almy Chemical Division business unit. Grace states that it acquired the property in 1966. Grace sold the property in or about 1972. A 1968 Product Guide indicates that the Marlboro Facility produced Polyfibron products including IDEAL Mechanical Rollers, IDEAL Printing Plate Adhesives, and IDEAL Printing and Lithographic Rollers. These products appear to have consisted generally of natural and synthetic rubber materials, rubber adhesives, and plastics. Currently, Grace neither owns nor conducts business at the Marlboro Facility.

20. Plainville Facility

Grace refers to the documents attached hereto as Exhibit 16. Grace states that Chomerics, Inc., purchased the Plainville Facility from Microwave Specialties, Inc., in 1962. Chomerics, Inc., then sold the Facility to Microwave Specialties, Inc., in 1966. The facility manufactured precision metal electronic components. Processes used included stamping, drawing, machining, tumbling, and degreasing. Currently, Grace neither owns nor conducts business at the Plainville Facility.

21. Woburn Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 17. In brief, Grace states that the Woburn Washington Street Facility operated as part of the Cryovac Division business unit. The Washington Street Facility was built in 1960. The Washington Street Facility manufactured machinery for the food packaging industry. On information and belief, processes at the facility involved machining

parts, welding, grinding, plating, and painting. The Washington Street Facility's operations included a machine shop, a metal shop, and a paint shop. Grace currently owns but no longer conducts business at the Facility.

22. Woburn Holton Street Facility

Grace refers to the documents attached hereto as Exhibit 18. Although several of the documents are from time periods either prior to Grace's ownership of the Holton Street Facility or outside of the relevant time period, Grace has included the documents to provide the Agency with general information regarding Holton Street Facility operations. Grace has been unable to confirm whether the information contained in these documents accurately reflects operations at the Facility during Grace's ownership of the facility during the relevant time period. The Woburn Holton Street Facility operated as part of the Dewey and Almy and Amicon business units. Based on information Grace located regarding Grace's acquisitions and dispositions of property, Grace states that it began leasing the Holton Street Facility in 1983 when the lease was transferred from Amicon to Grace at approximately the same time that Grace purchased Amicon. The lease for the Holton Street Facility was extended until 1998. The Holton Street Facility manufactured adhesives for use in the circuit industry, general dielectric materials and epoxy type materials. Currently, Grace neither owns nor conducts business at the Holton Street Facility.

23. Woburn Dragon Court/Commonwealth Avenue Building Complex

Grace has previously provided the Agency with information regarding operations at the Dragon Court Facility. Grace provided EPA with information responsive to this Item 3(a) in its December 9, 1988 response regarding Auburn Road Landfill and in Chomerics, Inc.'s January 28, 1992 response regarding Shaffer Landfill. In brief, the Dragon Court Facility operated as part of the Chomerics business unit. Based on information Grace located regarding Grace's acquisitions and dispositions of property, Grace states that it did not acquire the Dragon Court Facility until 1985 when it acquired Chomerics by merger. Grace thus operated the facility for only a short period of time during the relevant time period. Grace sold the Dragon Court Facility in 1994. In brief, Grace states that the Dragon Court Facility manufactured high performance electromagnetic interference and radio frequency interference shielding components used to contain electromagnetic energy emissions. Currently, Grace neither owns nor conducts business at the Dragon Court Facility.

24. Worcester Rockdale Street Facility

Grace refers to the documents attached hereto as Exhibit 19. Grace states that the Worcester Rockdale Street Facility was operated as part of the Vellumoid Company business unit. Grace has identified no information specifying the date operations at the Rockdale Street Facility commenced. The earliest year for which Grace was able to locate a listing of the Rockdale Street Facility in a Grace

corporate directory is 1963. Grace sold the Vellumoid Company business unit and assets, including the Rockdale Street Facility to Federal Mogul in 1965. Grace has identified no additional information regarding the Rockdale Street Facility. Currently, Grace neither owns nor conducts business at the Rockdale Street Facility.

25. Worcester Millbury Street Facility

On information and belief, the Worcester Millbury Street Facility was operated as part of the Dubois Chemicals business unit. Grace has identified no additional information regarding the Millbury Street Facility. On information and belief, the Facility was used for warehousing purposes, and is listed in Grace directories for the time period 1973 to 1974. Currently, Grace neither owns nor conducts business at the Millbury Street Facility.

26. Hudson Facility

Grace has previously provided the Agency with information regarding operations at the Hudson Facility. Grace provided the EPA with information responsive to this Item 3(a) in Chomerics, Inc.'s April 1, 1991 response regarding Shaffer Landfill and Chomerics, Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item.

The Hudson Facility was operated as part of the Chomerics business unit. Based on information Grace located regarding Grace's acquisitions and dispositions of property, Grace states that it did not acquire the Hudson Facility until 1985, when it acquired Chomerics by merger. Thus, Grace owned and operated the Hudson Facility for only a short period of time during the relevant time period. Grace sold the Hudson Facility in 1994. At some point in time, the Hudson Facility may have operated under the names Chomerics Laminates and TME. In brief, Grace states that the Hudson Facility manufactured silicone resin based, thermally conductive rubbers and specialty laminates of metal foils to dielectric films. Currently, Grace neither owns nor conducts business at the Hudson Facility.

27. Nashua Facility

Grace has previously provided the Agency with extensive information regarding the operations of the Nashua Facility. Grace provided EPA with such information in its May 16, 1986 response regarding Auburn Road Landfill, its December 9, 1988 response regarding Auburn Road Landfill and its December 24, 1988 supplement thereto, its December 20, 1988 response regarding Burns Hill Road Site and its January 30, 1989 supplement thereto, Grace Specialty Chemical Co.'s March 15, 1989 response regarding Charles George Reclamation Trust, Grace Specialty Chemical Co.'s October 26, 1990 response regarding Greenwood Chemical Site, its April 1, 1991 and January 29, 1992 responses regarding Shaffer Landfill, and the Organic Chemical Division's August 21, 1992 response

regarding Nyanza Chemical Waste Dump. Grace hereby incorporates all such information responsive to this Item of the Request. Additional responsive documents not yet provided to the Agency are attached hereto as Exhibit 20.

The Nashua Facility was operated as part of the Hampshire Chemical and Dewey and Almy business units. Based on information Grace located regarding Grace's acquisitions and dispositions of property, Grace states that it acquired the facility in 1965 when it acquired the assets and business of Hampshire Chemical. Grace operated the facility through the end of the relevant time period. Grace sold the Nashua Facility in 1992.

In brief, Grace states that the Nashua Facility was a batch chemical manufacturing plant which made a large variety of different products during the relevant time period. It also contained a research and development facility. Among the products manufactured were amino acids, chelating agents, chelated metals, sarcosine bases, surfactants, chemical intermediates and agricultural micronutrients. In addition, the Nashua Facility manufactured inorganic chemicals such as ammonia and sodium sulfate. Currently, Grace neither owns nor conducts business at the Nashua Facility.

28. Searsport Facility

Grace refers to the documents attached hereto as Exhibit 21. In brief, Grace states that from October 1, 1966 through March 31, 1970, Grace leased the plant and property from Northern Chemical Industries, Inc. (NCI). The original plant facilities were built during the 1930's by Summers Fertilizer Company and were acquired by NCI in the mid-1940s. When Grace entered into the contract to lease the Searsport Facility, NCI shut down a portion of the plant that produced anhydrous ammonia. Grace constructed a marine terminal to receive anhydrous ammonia by ship from Grace's plant in Trinidad, West Indies. On March 31, 1970, Delta Chemicals, Inc. purchased from Grace property improvements and certain raw material and product inventories present on NCI property. During Grace's operation of the facility, it produced agricultural fertilizers. More specifically, the plant produced: anhydrous ammonia, nitrogen solutions, sulfuric acid, ammonium sulfate, alum (aluminum sulfate) and normal superphosphate. Currently, Grace neither owns nor conducts business at the Searsport Facility.

29. Taunton Facility

Grace refers to the documents attached hereto as Exhibit 19. Grace states that the Taunton Facility was operated as part of the Vellumoid Company business unit. Grace has identified no information specifying the date operations at the Taunton Facility commenced. Grace sold the Vellumoid Company business unit and assets, including the Taunton Facility to Federal Mogul in 1965. Grace has identified no additional information regarding the Taunton Facility. Currently, Grace neither owns nor conducts business at the Taunton Facility.

- 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.*

Grace objects to Item 3(c) as being unduly burdensome. Without waiving its objection, Grace states as follows:

1. Acton Facility

Grace has previously provided EPA with extensive information regarding the chemicals produced, processed or used, or which would have been present in materials produced, processed or used, at the Acton Facility. Grace provided EPA with information responsive to this Item 3(c) in its Report submitted to the Director, Enforcement Division, of U.S. EPA on November 12, 1980, its December 9, 1988 response regarding Auburn Road Landfill and the attachments thereto, and its March 15, 1989 response regarding Charles George Reclamation Trust and the attachments thereto. Grace hereby incorporates by reference all such information responsive to this Item of the Request. In addition, Grace refers to the documents attached hereto as Exhibit 22.

2. Adams Facility

Grace has previously provided EPA with information regarding the chemicals produced, processed or used, or which would have been present in materials produced, processed or used, at the Adams Facility. Grace provided EPA with information responsive to this Item 3(c) in its January 14, 1993 response regarding Solvents Recovery Services of New England (SRSNE). Grace hereby incorporates by reference all such information responsive to this Item of the Request. In addition, Grace refers to the documents attached hereto as Exhibit 1. Employees interviewed for the purpose of responding to this Request stated that materials used at the Adams Facility included paper, perchloroethylene, toluene, methyl ethyl ketone, latex, and rubbers.

3. Agawam Facility

Grace refers to the documents attached hereto as Exhibit 2. In summary, Grace states that materials used at the Agawam Facility included: fiberglass, epoxy resins, epoxy hardeners, borosilicate microballoons, syntactic foam, acetaldehyde, acetone, methanol, methylene chloride, n-butyl alcohol, nitrobenzene, phenol, pyridine, toluene, trichlorofluoromethane, waste oil, xylene, fluorocarbon compounds, compressor oil, Frekote 1711, Frekote HMT, solvents, methyl ethyl ketone, methyl n-butyl ketone, butyl cellusolve, iso-butyl alcohol, n-butyl acetate,

ethyl acetate, cellusolve acetate, ethylene glycol mono ethyl ether, diethylene glycol dimethyl ether, 3,4 dicarboxy phenyl hexafluro propane, and epoxy paints. However, Grace does not know which, if any, of these materials were used during the relevant period.

4. Bedford Facility

N/A. Grace did not produce or process chemicals at the Bedford Facility. Grace's operations at the Bedford Facility were limited to a wholesale/retail operation for pickup and delivery of concrete admixtures and coatings.

5. North Billerica Facility

Grace refers to the documents attached hereto as Exhibit 4. In brief, Grace states that materials used at the North Billerica Facility included vermiculite.

6. Billerica Facility

Grace refers to the documents attached hereto as Exhibit 5. In brief, Grace states that materials used at the Billerica Facility included silver.

7. Boston Facility

Grace has identified no information responsive to this Item.

8. Cambridge Facility

Grace has previously provided EPA with extensive information regarding the chemicals produced, processed or used, or which would have been present in materials produced, processed or used, at the Cambridge Facility. Grace provided EPA with information responsive to this Item 3(c) in its December 9, 1988 response regarding Auburn Road Landfill and the attachments thereto, its March 15, 1989 response regarding Charles George Reclamation Trust and the attachments thereto, its June 29, 1992 response regarding Shaffer Landfill and the attachments thereto, and its Libby Response. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

Employees interviewed for the purpose of responding to this request stated that materials used at the Cambridge Facility included: acetone, alcohols, amines, asphalt, carbon black, clays, cleaning fluids, fillers, polystyrene, vermiculite, glycols, gypsum, heptanes, hexane, isoheptane, latex, lignosulfonates, lime, methyl ethyl ketone, oils, pigments, polyethylene, rubbers, solvents, tackifying resins, toluene, and water.

9. Canton Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 7.

10. Canton Walpole Street Facility

Grace refers to the documents attached hereto as Exhibit 8. In brief, Grace states that the materials used at the Walpole Street Facility included: methylene chloride, liquid epoxy resins, amine, tetraethylene pentamine, epoxy paint resin, tertbutylstyrene, acrylate copolymer latex, acrylic latex, butyl cellusolve, dodecylsuccinicanhydride, epoxy curing agent, fiberglass, polystyrene beads, glass beads, glass microballoons, akylyl glycidyl ether, trimethylol propane trimethacrylate, gamma methacryloxypropyltrimethoxysilane, polyamide resin, methyl ethyl ketone peroxide, benzoyl peroxide, cobalt naphthanate solution, and di-2 ethyl hexyl phthalate. Additional materials used in smaller quantities are described in the attached documents. Employees interviewed for the purpose of responding to this Request indicated that materials used at the Walpole Street Facility included: carbon black, epoxy resins, fiberglass, and reinforced fillers.

11. Danvers Facility

Grace refers to the documents attached hereto as Exhibit 9. However, Grace cannot confirm that the information contained in these documents accurately reflects operations at the Danvers Facility during Grace's ownership of the facility during the relevant time period. Grace states that materials used at the Danvers Facility included polymers, solvents, additives, agarose, absorbant pads, asbestos, acrylonitrile, mercury and substrate for sheet membrane.

12. Easthampton Facility

Grace refers to the documents attached hereto as Exhibit 10 and to its response to Item 3(b). In addition, Grace states that employees interviewed for the purpose of responding to this Request stated that materials used at the Easthampton Facility included: gypsum, paper, powdered soap products, styrene, tar, and vermiculite.

13. Gloucester – Sea-Pak

Grace has identified no information responsive to this Item.

14. Gloucester – Off Shore Fisheries

Grace has identified no information responsive to this Item.

15. Lawrence Facility

Grace has identified no information responsive to this Item.

16. Lexington Hartwell Avenue Facility

Grace has previously provided EPA with information regarding the chemicals produced, processed, or used, or which would have been present in the materials produced, processed, or used, at the Hartwell Avenue Facility. Grace provided

EPA with information responsive to this Item 3(c) in its December 9, 1988 response regarding Auburn Road Landfill and its December 24, 1988 supplement regarding the same, and in Amicon Grace Electronic Materials' June 26, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request. In addition, Grace refers to the documents attached hereto as Exhibit 13.

17. Lexington Hayden Avenue Facility

Grace has previously provided EPA with information regarding the chemicals used, or which would have been present in materials used, at the Hayden Avenue Facility. Grace provided EPA with information responsive to this Item 3(c) in its December 19, 1988 response regarding Auburn Road Landfill, its August 1, 1989 response regarding Landfill Resource & Recovery Site, and in Dewey & Almy Division's June 26, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item.

Employees interviewed for the purpose of responding to this request stated that the following materials were used at the Hayden Avenue Facility: acids, acrolates, aluminum, ammonia, clays, extenders, fillers, heptane, hexane, hexane acetones, hexatone, hydrocarbons, iron oxides, isocyanates, isopropanol, isopropyl alcohol, ketones, latex, methanol, methyl ethyl ketone, methacrylate, paper, photopolymers, phthalates, pigments, polyols, PVC, rubbers, solvents, steel, tackifying resins, toluene, thiol containing chemicals, thyo photo initiator, and xylene.

18. Lowell Facility

Grace has identified no information responsive to this Item.

19. Marlboro Facility

Grace has identified no information responsive to this Item.

20. Plainville Facility

Grace refers to the documents attached hereto as Exhibit 16. In summary, Grace states that materials used at the Plainville Facility included metals, lubricating oils and trichloroethylene.

21. Woburn Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 17. On information and belief, materials used at the Washington Street Facility included: zinc cyanide, nickel, alkaline, phosphoric acid, paint, lacquer, oil, solvents, trichloroethylene, toluene, sodium cyanide, muriatic acid, sodium hydroxide, nitric acid, chromic acid, alcohol, acetone, carbon tetrachloride, mineral spirits, lacquer thinner, alkon, helium, argon ,coolant, cutting oil, and lubricating oil, as well as brand name

products including “lubricool”, Perj, Differentiated, Klarifiant, Durkote, Prepare, Alkon, Sprex AC, Dufix, Supar Strip, Du Dri, Syn Electro Cooler. In addition, on information and belief, an on-site investigation indicated the presence of the following at the Washington Street Facility: tetrachloroethylene, trichlorethylene, 1,2-transdichloroethylene, vinyl chloride, 1,1,1-trichloroethane, chloroform, and benzene.

22. Woburn Holton Street Facility

Grace has previously provided EPA with information regarding the chemicals produced, processed or used, or which would have been present in materials produced, processed or used, at the Holton Street Facility. Grace EPA with information responsive to this Item 3(c) in Amicon Corporation’s June 7, 1983 response regarding Re-Solve, Inc. and Grace’s September 29, 1983 response regarding Silresim Chemical Corporation. Grace also refers to the documents attached hereto as Exhibit 18. However, Grace cannot confirm whether the information contained in these documents accurately reflects operations during Grace’s ownership of the Facility during the relevant time period. In summary, on information and belief, materials used at the Holton Street Facility included silver, acetone, lacquer thinner, epoxy resins, urethane, polyimide, fillers, xylene, hexane, trichlorethane, asbestos, and methyl ethyl ketone.

23. Woburn Dragon Court/Commonwealth Avenue Building Complex

Grace has previously provided EPA with information regarding the chemicals produced, processed or used, or which would have been present in materials produced, processed or used, at the Dragon Court Facility. Grace provided EPA with information responsive to this Item 3(c) in Chomerics, Inc.’s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

24. Worcester Rockdale Street Facility

Grace has identified no information responsive to this Item.

25. Worcester Millbury Street Facility

Grace has identified no information responsive to this Item.

26. Hudson Facility

Grace has previously provided EPA with information regarding the chemicals produced, processed or used, or which would have been present in materials produced, processed or used, at the Hudson Facility. Grace provided EPA with information responsive to this Item 3(c) in Chomerics, Inc.’s April 1, 1991 response regarding Shaffer Landfill and Chomerics, Inc.’s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request. In summary, Grace

states that acrylic adhesives, Freon, isopropyl alcohol, methyl ethyl ketone, methylene chloride, polyester adhesives, and urethane.

27. Nashua Facility

Grace has previously provided EPA with information regarding the chemicals produced, processed or used, or which would have been present in materials produced, processed or used, at the Nashua Facility. Grace provided EPA with information responsive to this Item 3(c) in its May 16, 1986 response regarding Auburn Road Landfill, its December 9, 1988 response regarding Auburn Road Landfill and its December 24, 1988 supplement thereto, its December 20, 1988 response regarding Burns Hill Road Site and its January 30, 1989 supplement thereto, Grace Specialty Chemical Co.'s March 15, 1989 response regarding Charles George Reclamation Trust, Grace Specialty Chemical Co.'s October 26, 1990 response regarding Greenwood Chemical Site, its April 1, 1991 and January 29, 1992 responses regarding Shaffer Landfill, and the Organic Chemical Division's August 21, 1992 response regarding Nyanza Chemical Waste Dump. Grace hereby incorporates all such information responsive to this Item of the Request. Grace also refers to the documents attached to as Exhibit 20. In summary, Grace states that materials used at the Nashua Facility included the following: ammonia, formaldehyde, hydrogen cyanide, ethylenediaminetetraacetic acid, sodium cyanide, nitrilotriacetic acid, sulfuric acid, nitric acid, methyl ethyl ketone, and methyl isobutyl ketone.

28. Searsport Facility

Grace refers to the documents attached hereto as Exhibit 21. In summary, Grace states that the materials used at the Searsport Facility included the following: molten sulfur, Bunker "C" Oil, Urea pills, granular bauxite (Al_2O_3), and ground phosphate rock.

29. Taunton Facility

Grace has identified no information responsive to this Item.

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.

Grace does not understand this question to seek information regarding changes in the nature or size of Respondent's operations outside of the relevant time period. Grace objects to Item 3(d) as being duplicative and irrelevant. Without waiving its objection, Grace states as follows:

Grace refers to its responses to Item 3(b).

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

Grace objects to Item 3(e) as being duplicative, irrelevant, and unduly burdensome. Without waiving its objection, Grace states as follows:

Grace refers to its responses to Item 3(b).

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

Grace objects to Item 3(f) as being duplicative, irrelevant, and unduly burdensome. Without waiving its objection, Grace states as follows:

Grace refers to its responses to Items 3(b) and 3(c).

- 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*
 - ii. *the monthly or annual quantity of each material used.*

Grace objects to Item 3(g) as being irrelevant and unduly burdensome. Without waiving its objection, Grace states as follows:

1. Acton Facility

Grace has previously provided EPA with information regarding the cleaning and maintenance of equipment and machinery at the Acton Facility. Grace provided EPA with information responsive to this Item 3(g) in its Report submitted to the Director, Enforcement Division, of U.S. EPA on November 12, 1980, and its December 9, 1988 response regarding Auburn Road Landfill and the attachments thereto. Grace hereby incorporates by reference all such information responsive to this Item.

2. Adams Facility

Grace has previously provided EPA with information regarding the cleaning and maintenance of equipment and machinery at the Adams Facility. Grace provided EPA with information responsive to this Item 3(c) in its January 14, 1993 response regarding Solvents Recovery Services of New England (SRSNE). Grace hereby incorporates by reference all such information responsive to this Item of the Request. In brief, Grace states that toluene, methyl ethyl ketone, isopropanol, and propylene dichloride were used to clean and maintain equipment and machinery.

3. Agawam Facility

Grace refers to the documents attached hereto as Exhibit 2. In summary, Grace states that acetone was used to clean parts and methylene chloride was used to clean syntactic foam molds. However, the time period during which these materials were used for such purposes is unclear.

4. Bedford Facility

Grace refers to the documents attached herein as Exhibit 3, which indicate that the Bedford Facility kept an inventory of replacement parts such as small electrical motors, pumps, etc., used in the normal course of daily business. Grace has identified no additional information responsive to this Item of the Request.

5. North Billerica Facility

Grace has identified no information responsive to this Item.

6. Billerica Facility

Grace has identified no information responsive to this Item.

7. Boston Facility

Grace has identified no information responsive to this Item.

8. Cambridge Facility

Grace has previously provided EPA with information regarding the cleaning and maintenance of equipment at the Cambridge Facility. Grace provided EPA with information responsive to this Item 3(g) in its responses to Inquiries 2 and 3 of the Construction Products Division's Cambridge facility June 29, 1992 response regarding Shaffer Landfill and the attachments thereto. Grace hereby incorporates by reference all such information responsive to this Item. In addition, one employee interviewed for the purpose of responding to this request stated that cotton pads were used to wipe down lab benches and were disposed of in waste receptacles. Another stated that rags containing solvents were used to wipe down equipment and were subsequently disposed of in waste receptacles. An employee familiar with the machine shop stated that cleaning fluids were used for cleaning parts in that shop. The employee also recalled that during the 1980's a maintenance company would come to the machine shop to change out the equipment, and would manifest and dispose of waste oil.

9. Canton Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 7. In brief, those documents indicate that methylene chloride was used for resin system pipe cleaning and 1,1,1 trichloroethane was used for parts cleaning.

10. Canton Walpole Street Facility

Grace has identified no information responsive to this Item.

11. Danvers Facility

Grace has identified no information responsive to this Item.

12. Easthampton Facility

One employee interviewed for the purpose of responding to this Request stated that the oil from hydraulics was changed when necessary, with waste oil being disposed of at a local gas station. Another employee indicated that maintenance activities were performed by Grace employees.

13. Gloucester – Sea-Pak

Grace has identified no information responsive to this Item.

14. Gloucester – Off Shore Fisheries

Grace has identified no information responsive to this Item.

15. Lawrence Facility

Grace has identified no information responsive to this Item.

16. Lexington Hartwell Avenue Facility

Grace previously provided the Agency with information regarding the cleaning and maintenance of equipment at the Hartwell Avenue Facility in response to Inquiry 2(d) of Grace Amicon Electric Materials' June 29, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item. In summary, operators performed routine cleaning and housekeeping, general maintenance was performed by in-house facilities personnel, and outside contractors were used to perform major and non-routine repairs. Methyl ethyl ketone was used as a cleaning agent.

17. Lexington Hayden Avenue Facility

Grace has previously provided EPA with information regarding the cleaning and maintenance of equipment at the Hayden Avenue Facility. Grace provided EPA with information responsive to this Item 3(g) in its response to Inquiries 2(d) and 3(d) of the Dewey & Almy Division's June 26, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item. In summary, Grace states that most machinery and equipment used in the administrative offices was repaired through the use of outside contractors. Some laboratory equipment maintenance, including motor and gearbox replacements and replacements of switches, fuses and gearpins, were performed

by facilities staff. Additionally, chemical developer for a camera/developer machine was changed by in-house personnel.

Employees interviewed for purposes of responding to this Request stated that methyl ethyl ketone and other solvents, including possibly isopropyl alcohol, were used for cleaning. According to employees, during the relevant time period cotton pads were used to wipe down laboratory benches and equipment and were disposed of in waste receptacles.

18. Lowell Facility

Grace has identified no information responsive to this Item.

19. Marlboro Facility

Grace has identified no information responsive to this Item.

20. Plainville Facility

Grace refers to the documents attached hereto as Exhibit 16. Grace states that trichloroethylene was used to clean metal parts.

21. Woburn Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 17. Employees deposed in the Anderson v. Cryovac litigation indicated that equipment was cleaned by employees using rags dipped into a solution that was kept in a 55 gallon container in the paint shop. Employees identified the solution variously as trichloroethylene (TCE), toluol, or mineral spirits. One employee also indicated that he had used alcohol to clean equipment. Another employee stated that he had used oakite, a degreaser soap, and acid to clean machines in the metal shop. One employee recalled using oakite to wash large conveyers on the blacktop outside of the assembly area. On information and belief, DuJet may also have been used as a cleaning product.

In addition, Employees deposed in the Anderson v. Cryovac litigation stated that the liquid in the degreasing tank was changed from time to time by Grace employees, although the frequency with which it was changed is unknown. Employees recollections regarding the frequency with which the liquid in the tank was changed ranged from every two weeks to twice a year. Several employees stated that a wet vacuum was used on occasion to remove waste liquids from equipment. On information and belief, the spray painting booth was also cleaned from time to time by Grace employees, although the frequency with which it was cleaned is unknown.

22. Woburn Holton Street Facility

Grace has identified no information responsive to this Item.

23. Woburn Dragon Court/Commonwealth Avenue Building Complex

Grace has previously provided the Agency with information regarding the cleaning and maintenance of equipment at the Dragon Court Facility. Grace provided EPA with information responsive to this Item 3(g) in Chomerics Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

24. Worcester Rockdale Street Facility

Grace has identified no information responsive to this Item.

25. Worcester Millbury Street Facility

Grace has identified no information responsive to this Item.

26. Hudson Facility

Grace has previously provided the Agency with information regarding the cleaning and maintenance of equipment at the Hudson Facility. Grace provided EPA with information responsive to this Item 3(g) in Chomerics Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

27. Nashua Facility

Grace has previously provided the Agency with information regarding the cleaning and maintenance of equipment and machinery at the Nashua Facility. Grace provided EPA with responsive information in its response to Inquiries 8 and 9 of its January 29, 1992 response regarding Shaffer Landfill. In addition, Grace provided additional responsive information in its December 9, 1988 response regarding Auburn Road Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

28. Searsport Facility

Grace has identified no information responsive to this Item.

29. Taunton Facility

Grace has identified no information responsive to this Item.

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.*

As an initial matter, Grace objects to the implication underlying this Item that spills occurred at the relevant facilities. In addition, Grace objects to Item 3(h) as being irrelevant and unduly burdensome. Without waiving its objection, Grace states as follows:

1. Acton Facility

Grace has previously provided EPA with information regarding the methods used to clean spills at the Acton Facility. Grace provided EPA with information responsive to this Item 3(h) in its Report submitted to the Director, Enforcement Division, of U.S. EPA on November 12, 1980, and its December 9, 1988 response regarding Auburn Road Landfill and the attachments thereto. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

2. Adams Facility

Grace refers to the documents attached hereto as Exhibit 1.

3. Agawam Facility

Grace refers to the documents attached hereto as Exhibit 2. In summary, Grace states that small amounts of acetone and methylene chloride may have been disposed of or spilled on the ground during periods in the 1960's and 1970's.

4. Bedford Facility

Grace has identified no information responsive to this Item.

5. North Billerica Facility

Grace has identified no information responsive to this Item.

6. Billerica Facility

Grace has identified no information responsive to this Item.

7. Boston Facility

Grace has identified no information responsive to this Item.

8. Cambridge Facility

Grace has previously provided EPA with information regarding the cleanup of spills at the Cambridge Facility. Grace provided EPA with information responsive to this Item 3(h) in its response to Item 3 of the Construction Products Division's Cambridge facility June 29, 1992 response regarding Shaffer Landfill and the

attachments thereto. Grace hereby incorporates by reference all such information responsive to this Item. In addition, one employee interviewed for the purpose of responding to this request stated that spill kits or vermiculite were used to contain spills and materials were subsequently disposed of in pails or small containers.

9. Canton Washington Street Facility

Grace refers to its February 1, 1989 response to EPA's request for information related to the Washington Street Facility, included in the documents attached hereto as Exhibit 7, for information responsive to this Item 3(h).

10. Canton Walpole Street Facility

Grace refers to the documents attached hereto as Exhibit 8 for information responsive to this Item 3(h).

11. Danvers Facility

Grace refers to the documents attached hereto as Exhibit 9. However, Grace cannot confirm that the information contained in these documents accurately reflects operations during the time Grace owned the Danvers Facility and the relevant time period.

12. Easthampton Facility

On information and belief, due to the nature of the materials used at the Easthampton Facility, known spills were of solid materials that were cleaned up and either used, recycled, or disposed of.

13. Gloucester – Sea-Pak

Grace has identified no information responsive to this Item.

14. Gloucester – Off Shore Fisheries

Grace has identified no information responsive to this Item.

15. Lawrence Facility

Grace has identified no information responsive to this Item.

16. Lexington Hartwell Avenue Facility

Grace has identified no information responsive to this Item.

17. Lexington Hayden Avenue Facility

Grace has previously provided EPA with information regarding the cleanup of spills at the Hayden Avenue Facility. Grace provided EPA with information

responsive to this Item 3(c) in its response to Inquiry 3(a) of the Dewey & Almy Division's June 26, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item. In summary Grace states that speedy dry absorbent was used for spills and was subsequently disposed of in a dumpster. In addition, one employee interviewed for the purpose of responding to this Request stated that spill kits or vermiculite were used to contain spills and were subsequently disposed of in pails or small containers.

18. Lowell Facility

Grace has identified no information responsive to this Item.

19. Marlboro Facility

Grace has identified no information responsive to this Item.

20. Plainville Facility

Grace has identified no information responsive to this Item.

21. Woburn Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 17. An employee deposed in the Anderson v. Cryovac litigation stated that on at least one occasion a drum, possibly containing a liquid used to clean metal, was punctured, resulting in the liquid spilling on the receiving room floor. The employee stated that he used water to wash the liquid out the receiving room door. Another employee stated that oakite spilled in the process of washing conveyors would be washed down drains in the Facility.

22. Woburn Holton Street Facility

Grace has identified no information responsive to this Item.

23. Woburn Dragon Court/Commonwealth Avenue Building Complex

Grace has previously provided the Agency with information regarding the cleanup of spills at the Dragon Court Facility. Grace provided EPA with information responsive to this Item 3(h) in Chomerics Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item.

24. Worcester Rockdale Street Facility

Grace has identified no information responsive to this Item.

25. Worcester Millbury Street Facility

Grace has identified no information responsive to this Item.

26. Hudson Facility

Grace has previously provided the Agency with the information Grace has been able to locate regarding the cleanup of spills at the Hudson Facility. Grace provided EPA with information responsive to this Item 3(h) in Chomerics Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item.

27. Nashua Facility

Grace has previously provided the Agency with information regarding the cleanup of spills at the Nashua Facility. Grace provided EPA with information responsive to this Item 3(h) in its January 29, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item. In summary, Grace states that that response indicates that Nutmeg brand cleaner was used for cleanup of small spills, with the resulting waste being disposed of in the trash.

28. Searsport Facility

Grace has identified no information responsive to this Item.

29. Taunton Facility

Grace has identified no information responsive to this Item.

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

Grace objects to Item 3(i) as being duplicative, vague, irrelevant, and unduly burdensome. Without waiving this objection, Grace states as follows:

Grace refers to its responses to Item 3(b).

- 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.*

The employees or former employees (some of whom may be deceased) identified below may have information responsive to the previous items of the Request.

1. Acton Facility

Grace provided EPA with information regarding individuals who have or had knowledge regarding operations and/or disposal practices in its December 9, 1988 response regarding Auburn Road Landfill. Grace hereby incorporates by

reference all such information responsive to this Item. In addition, Tom Barry, a current employee interviewed for the purpose of responding to this request, may have knowledge regarding Acton Facility operations and/or waste disposal practices. Employees interviewed indicated that the following former employees may have or have had responsive information: Frank Carusso, Tim Fisher, Tamal Hamdar, Norm Leveque, Frank Nicissy, Gil Nobile, Bob Phipps, and Don Pittman.

2. Adams Facility

Grace provided EPA with information regarding individuals who have or had knowledge regarding operations and/or disposal practices in its January 14, 1993 response regarding Solvents Recovery Services of New England (SRSNE). Grace hereby incorporates by reference all such information responsive to this Item. In addition, Grace refers to the documents attached hereto as Exhibit 1. Grace also states that Gregory Ciampa, James Hastie, Pat Moran, and John Stankiewicz, current employees interviewed for the purpose of responding to this Request, have knowledge regarding Adams Facility operations and/or waste disposal practices. Employees interviewed for purposes of responding to this request indicated that the following individuals may have relevant information: Al Cironi, Tom DiPerna, Harry Eschenbach, Tom Gavin, Johnny Johnson, Al Michaud, Paul Percy, Ed Murphy, and Bill Turek.

3. Agawam Facility

Grace refers to the documents attached hereto as Exhibit 2.

4. Bedford Facility

Grace has identified no information responsive to this Item.

5. North Billerica Facility

Grace has identified no information responsive to this Item.

6. Billerica Facility

Grace refers to the documents attached hereto as Exhibit 5.

7. Boston Facility

Grace has identified no information responsive to this Item.

8. Cambridge Facility

Grace provided EPA with information regarding individuals who have or had knowledge regarding operations and/or disposal practices at the Cambridge Facility, in its December 9, 1988 response regarding Auburn Road Landfill, its

June 29, 1992 response regarding Shaffer Landfill, and its August 21, 1992 response regarding Nyanza Chemical Waste Dump. Grace hereby incorporates by reference all such information responsive to this Item. In addition, Tom Barry, Barry Conlon, Maureen Dalton, Mario Favorito, Jim Hastie, John Hession, Dave Magner, Dave Smith, and Dave Steiner, current employees interviewed for the purpose of responding to the Request, have knowledge regarding Cambridge Facility operations and/or disposal practices. Employees interviewed indicated that the following individuals may also have or have had relevant information: George Allen, Lee Ming Choi, Kal Kallio, George Kevorkian, Dick Lee, Emil Petrusek, Tom Reilly, George Sykes, Joe Trebendis, Marlin Whitney, and Walter Zakrzewski.

9. Canton Washington Street Facility

Grace provided EPA with information regarding individuals who have or had knowledge regarding operations and/or disposal practices at the Washington Street Facility in its December 9, 1988 response regarding Auburn Road Landfill. Grace hereby incorporates by reference all such information responsive to this Item. Grace also refers to the documents attached hereto as Exhibit 7. In addition, Paul Hanlon, John Hession, and Greg Manning, current employees interviewed for the purpose of responding to this Request, have some knowledge regarding operations and waste disposal practices at the Washington Street Facility. In addition, employees interviewed indicated that the following individuals may have or have had relevant information: John Farrel, Bob Marshall and Tom Phair.

10. Canton Walpole Street Facility

Grace provided EPA with information regarding individuals who have or had knowledge regarding operations and/or disposal practices at the Walpole Street Facility in its December 9, 1988 response regarding Auburn Road Landfill. Grace hereby incorporates by reference all such information responsive to this Item. Grace also refers to the documents attached hereto as Exhibit 8. In addition, Paul Hanlon, and John Hession, current employees interviewed for the purpose of responding to this Request, have some knowledge regarding operations and waste disposal practices at the Washington Street Facility. In addition, employees interviewed indicated that the following individuals may have or have had relevant information: Bill Mischel, Randy Olsen, Larry Parkinson, Bill Porcello, Mike Small, Tim Teague, Noel Tessier, Bob Walsh, Craig Wellington, Jack White, and Al Willey.

11. Danvers Facility

Grace provided EPA with information regarding individuals who may have or had knowledge regarding operations and/or disposal practices at the Danvers Facility in its December 9, 1988 response regarding Auburn Road Landfill. Grace hereby incorporates by reference all such information responsive to this Item. Grace also

refers to the documents attached hereto as Exhibit 9, although Grace cannot confirm that the information contained in these documents accurately reflect operations during Grace's ownership and the relevant time period. In addition, an employee interviewed for the purpose of responding to this Request indicated that Walter Zakrzewski may have information regarding operations and/or waste disposal practices at the Danvers Facility.

12. Easthampton Facility

Grace refers to the documents attached hereto as Exhibit 10. In addition, James Grimaldi and Doug Powling, current employees interviewed for the purpose of responding to this Request, have some knowledge regarding operations and waste disposal practices at the Easthampton Facility. In addition, employees interviewed indicated that the following individuals may have or have had relevant information: Harry Eschenbach, Jay Kelly and Otto Blablaugh.

13. Gloucester – Sea-Pak

Grace has identified no information responsive to this Item.

14. Gloucester – Off Shore Fisheries

Grace has identified no information responsive to this Item.

15. Lawrence Facility

Grace has identified no information responsive to this Item.

16. Lexington Hartwell Avenue Facility

Grace previously provided the Agency with information regarding individuals who have knowledge or information regarding operations at the Hartwell Avenue Facility. Grace provided EPA with responsive information in Amicon Grace Electronic Materials' June 29, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item. In addition, employees interviewed for the purpose of responding to this Request indicated that the following individuals may have or have had relevant information: Al Cramphorn and Steve Hines.

17. Lexington Hayden Avenue Facility

Grace has previously provided EPA with information regarding individuals who have knowledge or information regarding operations at the Hayden Avenue Facility. Grace provided EPA with responsive information in its December 9, 1988 response regarding Auburn Road Landfill, its March 16, 1989 response regarding the L&RR Site, and the Dewey & Almy Division's June 26, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item. In addition, Tom Barry, Robert

Bettachi, Barry Conlon, Maureen Dalton, Paul Hanlon, Jim Hastie, Dick Lee, Dave Magner, Dave Smith, Bob Sorrentino, John Stenkiewicz, and Dave Steiner, individuals interviewed for the purpose of responding to this Request, have some knowledge regarding operations and waste disposal practices at the Hayden Avenue Facility. In addition, employees interviewed indicated that the following individuals may have or have had relevant information: Tim Adams, Bob Akiyama, Frank Bennet, Mike Carpenter, Joe Cunniff, Victor Dede, Tom DiPerna, Chuck Ehlers, Roy Fountain, Glen Gerehart, David Gibbs, Don Gush, Dave Hanley, Cheryl Hanlon, Bob Hoefeldt, Doug Hughes, Sandra Ladoulis, Bob Laferty, Chuck Larsen, Steve Lewis, Erik Lind, Walter Maloney, Lee Mapelthoppe, John Maria, Larry McCabe, Steve Naugler, Steve Olfgey, Robert Pemberton, Frank Peterson, Art Porter, Frank Rendulic, Joe Reynolds, Andy Robinson, Dick Shaner, Dick Steeves, Jean Tichanuk, Forest Wessels, Michael Yang, and Jim Zisson.

18. Lowell Facility

Grace has identified no information responsive to this Item.

19. Marlboro Facility

Grace has identified no information responsive to this Item.

20. Plainville Facility

Grace has identified no information responsive to this Item.

21. Woburn Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 17. In addition, Grace states the following individuals, whose depositions, taken in the course of the Anderson v. Cryovac litigation, were reviewed for purpose of responding to this Request, have or had knowledge regarding operations and/or disposal practices at the Washington Street Facility: Tom Barbas, Jan Bialach, Stanley Bialach, Vincent Forte, Paul Kelly, John Love, Guiseppe Meola, Ulf Nordin, Ed Orgazine, Paul Shalline, Richard Stewart, and James Watkins.

22. Woburn Holton Street Facility

Grace provided EPA with information regarding individuals who have or had knowledge regarding operations and/or disposal practices at the Holton Street Facility in its December 9, 1988 response regarding Auburn Road Landfill. Grace hereby incorporates by reference all such information responsive to this Item. Grace also refers to the documents attached hereto as Exhibit 18. However, Grace cannot confirm whether the information contained in these documents accurately reflects operations at the Facility during Grace's ownership of the Facility during the relevant time period. In addition, employees interviewed for the purpose of responding to this Request indicated that the following individuals

may have or have had relevant information: Gerry Caffey, John Mertens, Mike Patenaude, Gail Reed, and Paul Witts.

23. Woburn Dragon Court/Commonwealth Avenue Building Complex

Grace has previously provided the Agency with information regarding individuals with knowledge or information regarding operations and/or waste disposal practices at the Dragon Court Facility. Grace provided EPA with information responsive information in its December 9, 1988 response regarding Auburn Road Landfill, Chomerics, Inc.'s April 1, 1991 response regarding Shaffer Landfill and Chomerics, Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request. In addition, employees interviewed for the purpose of responding to this Request indicated that the following individuals may have or have had relevant information: Justin Bolger, Ron LaRochelle, Vicki Longo, and Richard Sherman.

24. Worcester Rockdale Street Facility

Grace has identified no information responsive to this Item.

25. Worcester Millbury Street Facility

Grace has identified no information responsive to this Item.

26. Hudson Facility

Grace has previously provided the Agency with information regarding individuals with knowledge or information regarding operations at the Hudson Facility. Grace provided EPA with information responsive information in its December 9, 1988 response regarding Auburn Road Landfill, Chomerics, Inc.'s April 1, 1991 response regarding Shaffer Landfill and Chomerics, Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

27. Nashua Facility

Grace has previously identified individuals with whom Grace has consulted to obtain information regarding operations and/or waste disposal at the Nashua Facility. Grace provided EPA with information responsive to this Item 3(j) in its May 16, 1986 response regarding Auburn Road Landfill, its December 9, 1988 response regarding Auburn Road Landfill, its December 20, 1988 response regarding Burns Hill Road Site, its January 29, 1992 responses regarding Shaffer Landfill, and the Organic Chemical Division's August 21, 1992 response regarding Nyanza Chemical Waste Dump. Grace hereby incorporates all such information responsive to this Item of the Request. In addition, employees interviewed for the purpose of responding to this Request indicated that the following individuals may have or have had relevant information: Bob Cronin,

Don Chapman, Harry Eschenbach, Peter Matonis, and Rick Winterson. Carl Erickson, a former employee at the Nashua Facility, may have relevant information.

28. Searsport Facility

Mr. Reed Wright was plant manager during Grace's tenure (1966-1970). His current address is unknown to Grace.

29. Taunton Facility

Grace has identified no information responsive to this Item.

4. Respondent's Wastes and Waste Streams

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.*

Grace objects to Item 4(a) as being redundant and unduly burdensome. Without waiving these objections, Grace states as follows:

Grace refers to its Response to Item 4(b).

- 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.*

Grace objects to Item 4(b) as being unduly burdensome. Without waiving this objection, Grace states as follows:

1. Acton Facility

Grace has previously provided EPA with detailed information regarding wastes generated at the Acton Facility. To the extent such information is available, Grace provided EPA with information responsive to this Item 4(b) in its Report submitted to the Director, Enforcement Division, of U.S. EPA on November 12, 1980, its December 9, 1988 response regarding Auburn Road Landfill and the attachments thereto, and its March 15, 1989 response regarding Charles George Reclamation Trust and the attachments thereto. Grace hereby incorporates by reference all such information responsive to this Item of the Request. In addition, Grace refers to the documents attached hereto as Exhibit 22.

2. Adams Facility

Grace has previously provided EPA with information regarding wastes generated at the Adams Facility. To the extent such information is available, Grace provided EPA with information responsive to this Item 4(b) in its January 14, 1993 response regarding Solvents Recovery Services of New England (SRSNE). In brief, that document states that the following volumes of wastes were being generated as of 1975:

Toluene	55 gallons/week
Methyl ethyl ketone	20 – 30 gallons/week
Propylene dichloride	15 – 20 gallons/week
Isopropanol	minimal
Laboratory samples	55 gallon fiber pack filled with 8 oz. jars/month
Waste #6 Fuel Oil	20 – 30 gallons/month

That response also states that employees recalled that neoprene and nitrile rubbers, methylene chloride, and wastes consisting of latex/rubber suspensions may have been generated by the facility. In addition, Grace refers to the documents attached hereto as Exhibit 1. Grace also states that an employee interviewed for the purpose of responding to this Request stated that wastes from the bottom of kettles used to mix solvents and fillers were disposed of in drums. Another employee estimated that in the late 1970's approximately fifty to eighty drums of waste materials were disposed of approximately once per year. That employee also recalls that solid scraps of rubber were generated by the Facility and were disposed of in a dumpster.

3. Agawam Facility

Grace refers to the documents attached hereto as Exhibit 2. In summary, Grace states that wastes generated by the Agawam Facility included waste hazardous liquids including methylene chloride, and solid wastes including scrap fiberglass. Many of the solvents used, including acetone, fluorocarbon compounds, and methylene chloride, evaporated during use.

4. Bedford Facility

Grace has identified no information responsive to this Item.

5. North Billerica Facility

Grace has identified no information responsive to this Item.

6. Billerica Facility

Grace refers to the documents attached hereto as Exhibit 5. Grace states that wastes generated from the manufacturing process conducted by Amicon contained silver. In addition, wastes generated by the Billerica Facility included solid wastes such as paper and cardboard waste.

7. Boston Facility

Grace has identified no information responsive to this Item.

8. Cambridge Facility

Grace has previously provided EPA with detailed information regarding wastes generated at the Cambridge Facility. To the extent that such information is available, Grace provided EPA with information responsive to this Item 4(b) in its December 9, 1988 response regarding Auburn Road Landfill, Grace Special Chemical's March 15, 1989 response regarding Shaffer Landfill, the Construction Products Division's Cambridge facility June 29, 1992 response regarding Shaffer Landfill, and Cambridge Laboratories' Libby Response. Grace hereby incorporates by reference all such information responsive to this Item.

In addition, one employee interviewed for the purpose of responding to this Request stated that wastes from the Construction Products Division laboratory would have consisted of mostly organic solid wastes. Another employee indicated that wastes from the machine shop included waste oils, cleaning fluids, a small amount of solvents, spray cans, and cleaning rags.

9. Canton Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 7. In summary, Grace states that wastes generated by the Washington Street Facility included: water, oil, styrene monomer, vacuum pump oil, epoxy, silicone, 1,1,1-trichloroethane, water and amine catalyst, water and anhydride, water and neoprene, toluene, acetone, methylene chloride, machine oil, zinc chloride, aluminum chloride, styrene-polyester-acrylic, styrene-oil-epoxy, spent potassium cyanide solution, and turpentine-acetone.

10. Canton Walpole Street Facility

Grace refers to the documents attached hereto as Exhibit 8. In summary, Grace states that wastes generated by the Walpole Street Facility included: adsorber trash, scrap foam, paper, cardboard, boxes, cured epoxy wastes, PCB materials, solid epoxy resin powder, aluminum powder, Pliobond contact adhesive, methylene chloride, pyromellitic dianhydride, epoxy resin 828, glass microballoon, epoxy latex paint, cured tertbutylstyrene, alkyl glycidyl ether, powdered phenolic resin, iron oxide powder, cured epoxy resin, polyester resin, tertbutylstyrene resin, dodecenylsuccinic anhydride, isopropyl alcohol, liquid and solid carbon black, and waste oil. One employee interviewed for the purpose of responding to this Request who worked at the Walpole Street Facility subsequent to the relevant time period indicated that because of the nature of the operations at the Facility, very little liquid waste would have been generated by the Facility. According to that employee, the materials would react and form a non-hazardous plastic solid waste.

11. Danvers Facility

Grace refers to the documents attached hereto as Exhibit 9. However, Grace cannot confirm that the information contained in these documents accurately

reflects operations at the Danvers Facility during the time Grace owned the Facility and the relevant time period. .

12. Easthampton Facility

Grace refers to the documents attached hereto as Exhibit 10. In particular, Grace refers to its July 22, 1988 response to MA DEQE's request for information regarding the Oliver Street Landfill, which stated that the types of materials generally believed to have been transported from the Easthampton Facility to the Oliver Street Site consisted primarily of vermiculite fines and screenings, baghouse dusts, and stoner rocks. Scrap packaging, boxes, paper bags, occasional damaged inventory, small amounts of waste oil, broken wooden pallets, empty drums and general office and plant scrap were also removed from the facility. Some of the packaging, bags and boxes contained raw materials used by Grace.

In addition, employees interviewed for the purpose of responding to this Request stated that wastes included: crushed barrels, solidified tar, waste fuel oil, fiber drums, paper bags, waste material from vermiculite, and general office trash. The employees also indicated that the facility generated very little liquid waste.

13. Gloucester – Sea-Pak

Grace has identified no information responsive to this Item.

14. Gloucester – Off Shore Fisheries

Grace has identified no information responsive to this Item.

15. Lawrence Facility

Grace has identified no information responsive to this Item.

16. Lexington Hartwell Avenue Facility

Grace previously provided EPA with information regarding wastes generated at the Hartwell Avenue Facility. To the extent that such information is available, Grace provided EPA with responsive information in Amicon Grace Electronics Materials' June 29, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item.

17. Lexington Hayden Avenue Facility

Grace has previously provided EPA with information regarding wastes generated at the Hayden Avenue Facility. To the extent that such information is available, Grace provided EPA with responsive information in its December 9, 1988 response regarding Auburn Road Landfill, its March 16, 1989 response regarding the L&RR Site, and the Dewey & Almy Division's June 26, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such

information responsive to this Item. In summary, those responses indicate that wastes included empty food cans, office wastes, lab wastes, glass jars, food wastes, speedy-dry absorbent for spills, crankcase oil, empty jugs and containers, metal chips from a small lathe, latex, urethane, solids and solvents. Additionally, those responses attach various documents which provide additional details regarding the types and volumes of hazardous wastes generated at the Hayden Avenue Facility.

In addition, employees interviewed for the purpose of responding to this Request stated that wastes included: waste cans from the taste testing labs, dried cured rubber on fabric or paper, powders, clays, cured solid wastes, latex water based waste, heptane, hexane, off-spec liquid solutions, rubbers, and paste-like, semi-liquid wastes from the plastisols laboratory.

18. Lowell Facility

Grace has identified no information responsive to this Item.

19. Marlboro Facility

Grace has identified no information responsive to this Item.

20. Plainville Facility

Grace refers to the documents attached hereto as Exhibit 16. In summary, Grace states that wastes generated by the Plainville Facility included trichloroethylene, waste oil, metal scrap, and process wastewater.

21. Woburn Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 17. In summary, Grace states that on information and belief, wastes generated at the Washington Street Facility may have included: paint sludge, scrap metal, waste oil, waste solvents, paper, light bulbs, empty cans, rags, wood, metal chips, paint thinner, lubricants, and cutting oils. One employee interviewed for the purpose of responding to this Request indicated that due to the nature of the operations at the Facility, the amount of solvents used was not large.

22. Woburn Holton Street Facility

Grace provided EPA with information regarding wastes generated by the Holton Street Facility in Amicon Corporation's June 7, 1983 response regarding Re-Solve, Inc. and Grace's September 29, 1983 response regarding Silresim Chemical Corporation. Grace hereby incorporates by reference all such information responsive to this Item. Grace also refers to the documents attached hereto as Exhibit 18. However, Grace cannot confirm whether the information contained in these documents accurately reflects operations during Grace's ownership of the Facility during the relevant time period. Grace states that wastes

generated by the Holton Street Facility included silver, lacquer thinner, acetone, polymer resins, xylene, hexane, and trichlorethane.

23. Woburn Dragon Court/Commonwealth Avenue Building Complex

Grace has previously provided the Agency with available information regarding wastes generated at the Dragon Court Facility. Grace provided EPA with information responsive information in its December 9, 1988 response regarding Auburn Road Landfill, and Chomerics, Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

In brief, those responses indicate that wastes generated at the Dragon Court Facility included trash, waste flammable liquid including alcohol, toluene/acetone mixture, acetone, and aluminum hydroxide sludge.

24. Worcester Rockdale Street Facility

Grace has identified no information responsive to this Item.

25. Worcester Millbury Street Facility

Grace has identified no information responsive to this Item.

26. Hudson Facility

Grace has previously provided the Agency with available information regarding wastes generated at the Hudson Facility. Grace provided EPA with information responsive to this Item 4(b) in Chomerics, Inc.'s April 1, 1991 response regarding Shaffer Landfill, and Chomerics, Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

27. Nashua Facility

Grace has previously provided the Agency with information regarding wastes and byproducts generated at the Nashua Facility. In particular, in its January 29, 1992 response regarding Shaffer Landfill, Grace provided extensive information regarding wastes generated at the Nashua Facility. In addition, Grace provided EPA with additional responsive information in its December 9, 1988 response regarding Auburn Road Landfill and its December 24, 1988 supplement thereto, its December 20, 1988 response regarding Burns Hill Road Site and its January 30, 1989 supplement thereto, Grace Specialty Chemical Co.'s March 15, 1989 response regarding Charles George Reclamation Trust, and its April 1, 1991 response regarding Shaffer Landfill. Grace hereby incorporates all such information responsive to this Item of the Request. In addition, Grace refers to the documents attached hereto as Exhibit 20.

28. Searsport Facility

Grace has identified no information responsive to this Item.

29. Taunton Facility

Grace has identified no information responsive to this Item.

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.*

1. Acton Facility

Grace has previously provided EPA with detailed information regarding waste collection and storage at the Acton Facility. Grace provided EPA with information responsive to this Item 4(c) in its Report submitted to the Director, Enforcement Division, of U.S. EPA on November 12, 1980, its December 9, 1988 response regarding Auburn Road Landfill and the attachments thereto, and its March 15, 1989 response regarding Charles George Reclamation Trust and the attachments thereto. In addition, an additional responsive document, attached hereto as Exhibit 22, indicates that on at least one occasion 55-gallon drums and 5-gallon pails were removed from the Acton Facility by Suffolk Services. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

2. Adams Facility

Grace has previously provided EPA with information regarding waste collection and storage at the Adams Facility. Grace provided EPA with information responsive to this Item 4(c) in its January 14, 1993 response regarding Solvents Recovery Services of New England (SRSNE). Grace hereby incorporates by reference all such information responsive to this Item. In summary, that response indicates that wastes were removed from the Adams Facility in 55 gallon drums. In addition, Grace refers to the documents attached hereto as Exhibit 1.

In addition, one employee interviewed for the purpose of responding to this Request stated that wastes from kettle bottoms were placed in drums and stored in a drum storage area in the backyard of the Facility. The employee stated that he

had no knowledge regarding whether the drums were new or used. Another employee indicated that solvent and rubber compound wastes were collected in black steel drums or tan lined fiber drums which were located in areas of the plant where rubber compounds were used. The employee stated that full drums were moved to the back of the building or outside of the plant. The employee also indicated that he recalled that solid wastes were disposed of in a dumpster.

3. Agawam Facility

Grace refers to the documents attached hereto as Exhibit 2. Grace states that wastes were collected, stored, and disposed of in drums and in an on-site dumpster.

4. Bedford Facility

Grace has identified no information responsive to this Item.

5. North Billerica Facility

Grace has identified no information responsive to this Item.

6. Billerica Facility

Grace has identified no information responsive to this Item.

7. Boston Facility

Grace has identified no information responsive to this Item.

8. Cambridge Facility

Grace has previously provided EPA with detailed information regarding waste collection and storage at the Cambridge Facility. To the extent that such information is available, Grace provided EPA with information responsive to this Item 4(c) in its December 9, 1988 response regarding Auburn Road Landfill, Grace Special Chemical's March 15, 1989 response regarding Shaffer Landfill, its June 29, 1992 response regarding Shaffer Landfill, and Cambridge Laboratories' Libby Response. Grace hereby incorporates by reference all such information responsive to this Item. In summary, Grace states that those responses indicate that drums, pails, jars, Lever paks, storage receptacles, dumpsters, and on-site settling ponds were used to collect, store and dispose of wastes. In addition, Grace refers to the documents attached hereto as Exhibit 23, which indicate that drums and various sized containers were used to store and dispose of wastes generated at the Cambridge Facility.

In addition, one employee interviewed for the purpose of responding to this request indicated that between 1967 and 1972, laboratory wastes were disposed of in drums, red containers, pails, and tins, that were placed in the laboratory for that

purpose. Another employee indicated that waste rags and oil from machine shop operations would be placed into drums stored in the machine shop. The drum would be transported to an area outside of Building 30 approximately once every two months, after which it would be removed by a waste hauler.

9. Canton Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 7. In summary, Grace states that wastes were stored, collected, and disposed of in drums and pails.

10. Canton Walpole Street Facility

Grace refers to the documents attached hereto as Exhibit 8. In summary, Grace states that wastes were stored, collected, and disposed of in carts, balers, dumpsters, boxes, barrels, pails, and steel drums.

11. Danvers Facility

Grace refers to the documents attached hereto as Exhibit 9. However, Grace cannot confirm that the information contained in these documents accurately reflects operations at the Danvers Facility during the time Grace owned the Facility during the relevant time period. Grace states that a construction company providing services at the Danvers Facility may have used a 30 yard open top dumpster to collect construction wastes.

12. Easthampton Facility

Grace refers to the documents attached hereto as Exhibit 10. In particular, Grace refers to its July 22, 1988 response to MA DEQE's request for information regarding the Oliver Street Landfill, which stated that waste paper, empty cardboard barrels and broken skids were stored in a 40 cubic yard compactor; stone waste was stored in a 20 cubic yard compactor (stone waste was formerly placed in an open stone container); and all other waste was stored in a 30 cubic yard open top container. An employee interviewed for the purpose of responding to this Request indicated that a compactor was used to store and dispose of wastes, and that for some period of time stone was placed into a separate container.

13. Gloucester – Sea-Pak

Grace has identified no information responsive to this Item.

14. Gloucester – Off Shore Fisheries

Grace has identified no information responsive to this Item.

15. Lawrence Facility

Grace has identified no information responsive to this Item.

16. Lexington Hartwell Avenue Facility

Grace has previously provided EPA with information regarding waste collection and storage at the Hartwell Avenue Facility. Grace provided EPA with information responsive to this Item 4(c) in its June 29, 1992 response regarding Shaffer Landfill. In summary, that response indicates that Pease and Curran 55 gallon capacity 3-ring black drums, a 10 cubic yard capacity blue dumpster with Browning Ferris Industries ("BFI") markings, various sized containers, and small wastebaskets were used to collect and dispose of wastes. Additionally, a Suffolk Services customer container list, attached hereto as Exhibit 13, indicates that various sized containers were used at the Hartwell Avenue Facility.

17. Lexington Hayden Avenue Facility

Grace has previously provided EPA with information regarding waste collection and storage at the Hayden Avenue Facility. Grace provided EPA with information responsive to this Item 4(c) in response to Inquiry 4(b) in Dewey & Almy Division's June 26, 1992 response regarding Shaffer Landfill. In addition, Grace provided EPA with additional responsive information in its December 9, 1988 response regarding Auburn Road Landfill, and its March 16, 1989 response regarding the L&RR Site. Grace hereby incorporates by reference all such information responsive to this Item. In addition, Grace refers to the documents attached hereto as Exhibit 24.

In summary, those documents state that the following were used to collect, store, and/or dispose of wastes: beige steelcase wastebaskets; blue dumpsters; gray 2.5 gallon tighthead or openhead containers; green and white or black 5 gallon pails; yellow 30 gallon drums; 55 gallon drums of various colors, some black, with orange labels, with "flammable liquid" labels on some drums and some marked "latex" and "non-hazardous waste"; and 55 gallon lever-pack drums. Additionally, the attached documents indicate that various sized containers were used at the Hayden Avenue Facility.

In addition, employees interviewed for the purpose of responding to this Request stated that drums were placed in laboratory areas for the disposal of wastes. One employee indicated that employees would transport empty drums from the solvent storage areas to laboratory areas for use as waste receptacles. The employee indicated that he had no knowledge of whether the empty drums were used or new. A laboratory employee indicated that labels were placed on drums indicating the contents of the drum and the dates when the drum started and concluded being used to collect wastes. On information and belief, filled drums were transported to a waste storage area, located near the loading dock, for storage until removal. Employees also indicated that some wastes were carried to the waste storage area and placed in drums located in that area. Full drums would be manifested, and paperwork kept in a filing cabinet in the Shipping and

Receiving Department. Liquid wastes were stored in 55 gallon drums or pails. Employees recalled that open-head drums were black and closed-head drums were black or green. On information and belief some liquid and solid wastes were also placed in jars which were then placed into drums packed with vermiculite. Employees referred to these drums as labpacks. One employee indicated that these labpacks were black with white tops. One employee indicated that labpacks would be packed and manifested by employees of the waste hauler.

Some employees indicated that they believed that drums in which raw materials were received were later used for waste storage and disposal. One employee recalled that the Facility purchased approximately fifty to ninety empty drums approximately once every two years, which were stored outside of the Facility or inside the Facility near the waste storage area and removed and used as needed. That employee stated the Hayden Avenue Facility purchased both new and reconditioned drums, which were used for the disposal of hazardous and non-hazardous wastes, respectively, and that the empty drums were purchased from Bancroft Barrel Company.

Another employee indicated that empty drums were received from John Kelly, an independent trash hauler, who on information and belief removed wastes from the facility. The employee indicated that Mr. Kelly would transport empty drums to replace the waste drums he removed from the Facility.

18. Lowell Facility

Grace has identified no information responsive to this Item.

19. Marlboro Facility

Grace has identified no information responsive to this Item.

20. Plainville Facility

Grace refers to the documents attached hereto as Exhibit 16. Those documents indicate that for some period prior to 1990, process wastewater was discharged into on-site cesspools. Grace has identified no additional information responsive to this Item.

21. Woburn Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 17. On information and belief, dirty solvent was placed in a drum in the paint shop. One employee deposed during the Anderson v. Cryovac litigation indicated that some waste solvents were collected in 55 gallon drums that were placed outside near the back of the building. Employees also indicated that paint sludge was either dumped on the ground, dried, and placed with general plant trash, or placed in 55 gallon drums. Metal scraps from the degreasing machine were, according to the statements of one employee, put in a barrel and picked up by a dump truck. One

employee stated that scrap metal, folded sheet metal strips, left over ends of rods, wood, paper, bag, and lunch bags would be placed in barrels. Several employees also indicated that wastes were collected in various sized containers prior to being disposed of on-site at the Facility.

In addition, an employee deposed during that litigation stated that during the mid to late 1970's the Facility received up to twenty empty barrels per year which were used for the collection of wastes in various parts of the Facility. The employee stated that he could not remember which company supplied the barrels. The employee did not identify the Whitney Barrel Company as the supplier of the barrels. In addition, in the deposition of John Whitney, III, attached hereto as Exhibit 25, Mr. Whitney states that Whitney Barrel never received drums from or sold drums to the Washington Street Facility.

22. Woburn Holton Street Facility

Grace refers to the documents attached hereto as Exhibit 18. However, Grace cannot confirm whether the information contained in these documents accurately reflects operations at the Facility during Grace's ownership of the Facility during the relevant time period. In summary, Grace states that wastes were collected and/or removed from the Holton Facility in drums and containers.

23. Woburn Dragon Court/Commonwealth Avenue Building Complex

Grace has previously provided the Agency with information regarding containers used to store and dispose of wastes generated at the Dragon Court Facility. Grace provided EPA with information responsive to this Item 4(c) in its December 9, 1988 response regarding Auburn Road Landfill, and Chomerics, Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

In brief, Grace states that those responses indicate that various sized containers were used to store and dispose of trash, and drums, bags, and smaller sized containers were used to dispose of other wastes.

24. Worcester Rockdale Street Facility

Grace has identified no information responsive to this Item.

25. Worcester Millbury Street Facility

Grace has identified no information responsive to this Item.

26. Hudson Facility

Grace has previously provided the Agency with information regarding containers used to store and dispose of wastes generated at the Hudson Facility. To the extent such information is available, Grace provided EPA with information

responsive to this Item 4(c) in Chomerics, Inc.'s April 1, 1991 response regarding Shaffer Landfill and Chomerics, Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

In summary, Grace states that those responses indicate that containers from BFI were used to collect and dispose of wastes. In addition, those responses indicate additional wastes were collected in 55-gallon drums which were sealed and stored until arrangements for pickup and disposal were made.

27. Nashua Facility

Grace has previously provided the Agency with information regarding the storage and disposal of wastes generated at the Nashua Facility. In particular, in its January 29, 1992 response regarding Shaffer Landfill, Grace provided extensive information regarding waste storage and disposal. In addition, Grace provided EPA with additional responsive information in its December 1, 1982 letter regarding Keefe Environmental Services, its September 29, 1983 letter regarding Silresim Chemical Corporation, its December 9, 1988 response regarding Auburn Road Landfill and its December 24, 1988 supplement thereto, its December 20, 1988 response regarding Burns Hill Road Site and its January 30, 1989 supplement thereto, Grace Specialty Chemical Co.'s March 15, 1989 response regarding Charles George Reclamation Trust, and its April 1, 1991 response regarding Shaffer Landfill. Grace hereby incorporates all such information responsive to this Item of the Request. In addition, Grace refers to the documents attached hereto as Exhibit 20. In brief, Grace states that these documents indicate that at various times an on-site lagoon, 55 gallon drums, 5 gallon containers, bottles, fiber drums, various sized containers were used to store and dispose of wastes from the Nashua Facility.

28. Searsport Facility

Grace has identified no information responsive to this Item.

29. Taunton Facility

Grace has identified no information responsive to this Item.

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

Grace objects to this item of the Request on the ground that the terms "responsibility" and "managing" are vague and ambiguous. Grace understands this item of the request to seek information concerning persons who collected or disposed of waste, or directed others to collect or dispose of waste, at each facility subject to the Request. In addition, Grace objects to Item 4(d) as being duplicative. Without waiving these objections, Grace states as follows:

Grace refers to its responses to Item 5(a).

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.

1. Acton Facility

The following available responsive documents have been provided to EPA:

Historical Operational Usage Report, April 14, 1983.

Sept. 12, 1980, Preliminary Report to DEQE (describes past and present waste disposal practices and waste disposal sites at Acton Facility)

Nov. 12, 1980, Report to DEQE and EPA (describes past and present waste disposal practices and waste disposal sites at Acton Facility)

2. Adams Facility

The following available responsive documents were provided to EPA in Grace-Polyfibron's January 14, 1993 response regarding SRSNE:

Eckhart Survey, 1979

09/11/1975 Memo re Solvent Disposal Problems

3. Agawam Facility

Grace has identified no information responsive to this Item.

4. Bedford Facility

Grace has identified no information responsive to this Item.

5. North Billerica Facility

Grace has identified no information responsive to this Item.

6. Billerica Facility

Grace has identified no information responsive to this Item.

7. Boston Facility

Grace has identified no information responsive to this Item.

8. Cambridge Facility

The following available responsive documents have been provided to EPA:

Excerpts of, Haley and Aldrich, Inc., Environmental Assessment Report for the Proposed Alewife Center Development at the W.R. Grace & Co. Property; April 16, 1985

Excerpts of, Haley and Aldrich, Inc., Environmental Data Report for the W.R. Grace & Co. Property in Cambridge, Massachusetts; April 1988

Cambridge facility annual hazardous waste reports for 1981 and 1983 to 1986.

1979 Cambridge response to Eckhart Survey

Cambridge facility CERCLA §103(c) notification forms

Haley and Aldrich, Inc., Groundwater Investigation, W.R. Grace & Company, Cambridge, MA, March 5, 1980

9. Canton Washington Street Facility

The following document is included in the documents attached hereto as Exhibit 7:

Annual Hazardous Waste Report for the year ending 1983

10. Canton Walpole Street Facility

The following documents are included in the documents attached hereto as Exhibit 8:

Spill Control Audit at Plant No. 2, Camp Dresser & McKee, Inc., January 1983

Annual Hazardous Waste Reports for the years ending 1983, 1984 and 1985

11. Danvers Facility

Grace has identified no information responsive to this Item.

12. Easthampton Facility

Grace has identified no information responsive to this Item.

13. Gloucester – Sea-Pak

Grace has identified no information responsive to this Item.

14. Gloucester – Off Shore Fisheries

Grace has identified no information responsive to this Item.

15. Lawrence Facility

Grace has identified no information responsive to this Item.

16. Lexington Hartwell Avenue Facility

Grace has identified no information responsive to this Item.

17. Lexington Hayden Avenue Facility

The following available responsive documents have been provided to EPA:

Commonwealth of Massachusetts, Department of Environmental Quality Engineering Proposed Annual Hazardous Waste Report for 1982

Commonwealth of Massachusetts, Department of Environmental Quality Engineering Generator and Facility Annual Reports for 1983-1986

EPA, Section 103(c), Notification of Hazardous Waste Site

Quarterly wastewater discharge reports

18. Lowell Facility

Grace has identified no information responsive to this Item.

19. Marlboro Facility

Grace has identified no information responsive to this Item.

20. Plainville Facility

Grace has identified no information responsive to this Item.

21. Woburn Washington Street Facility

The following documents have previously been provided to EPA or are attached hereto as Exhibit 17:

September 21, 1978 Site Inspection Report

February 5, 1982 response to Request for Information pursuant to Section 3007 of the Resource Conservation and Recovery Act

22. Woburn Holton Street Facility

Grace has identified no information responsive to this Item.

23. Woburn Dragon Court/Commonwealth Avenue Building Complex

The following available responsive documents have been provided to EPA:

May 23, 1989 Notice to EPA filed pursuant to Section 103(c) of CERCLA regarding onsite disposal of wastes prior to 1980

24. Worcester Rockdale Street Facility

Grace has identified no information responsive to this Item.

25. Worcester Millbury Street Facility

Grace has identified no information responsive to this Item.

26. Hudson Facility

The following available responsive documents have been provided to EPA:

Annual Hazardous Waste Generation report for the period July 1985 through July 1986

27. Nashua Facility

The following available responsive documents have been provided to EPA:

Quarterly Hazardous Waste Generator Reports, 1981-1986.

28. Searsport Facility

Grace has identified no information responsive to this Item.

29. Taunton Facility

Grace has identified no information responsive to this Item.

- 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.*

Grace understands this Item to Request information regarding former or current employees and all other persons who have knowledge or information regarding wastes, wastes streams, and waste collection at the relevant facilities.

Grace refers to its responses to Item 3(j).

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.*

Grace objects to Item 5(a) on the ground that it is redundant, vague and ambiguous. Furthermore, Grace reiterates that it no longer operates 28 out of 29 facilities subject to this request. Without waiving its objection, Grace states as follows:

1. Acton Facility

On information and belief, the following individuals had responsibility at various times for the disposal, treatment, storage, recycling, or sale of wastes: Frank Carusso, Tim Fisher, Frank Nicissy, Gil Nobile, and Bob Phipps.

2. Adams Facility

Grace has previously provided EPA with information regarding individuals who had responsibility for the disposal, treatment, storage, recycling, or sale of wastes generated at the Adams Facility. Grace provided EPA with information responsive to this Item 5(a) in its January 14, 1993 response regarding Solvents Recovery Services of New England (SRSNE). Grace hereby incorporates by reference all such information responsive to this Item of the Request. In addition, Grace refers to the documents attached hereto as Exhibit 1. Grace also refers to its response to Item 3(j).

In addition, employees interviewed for the purpose of responding to this Request indicated that the following individuals had responsibility at various times for the disposal of wastes generated at the Facility: Greg Ciampa, Al Cironi, Tom Gavin, Johnny Johnson, Pat Moran, Al Michaud, Ed Murphy, and Bill Turek.

3. Agawam Facility

Grace refers to the documents attached hereto as Exhibit 2.

4. Bedford Facility

Grace has identified no information responsive to this Item.

5. North Billerica Facility

Grace has identified no information responsive to this Item.

6. Billerica Facility

Grace refers to the documents attached hereto as Exhibit 5, which indicate that John Mertens and Brian Price had responsibility for or knowledge regarding the disposal of wastes from the Billerica Facility

7. Boston Facility

Grace has identified no information responsive to this Item.

8. Cambridge Facility

Grace has previously provided EPA with information regarding individuals who had responsibility for the disposal, treatment, storage, recycling, or sale of wastes from the Cambridge Facility. Grace provided EPA with information responsive to this Item 5(a) in its response to Inquiry 4 of the Construction Products Division's Cambridge facility's June 29, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item. In addition, employees interviewed for the purposes of responding to this Request indicated that the following individuals at various times may have had responsibility for the disposal, treatment, storage, recycling, or sale of wastes: George Allen, Kal Kalio, George Kevorkian, George Sykes, Joe Trebendis, and Walter Zakrewski.

9. Canton Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 7. In addition, on information and belief, the following individuals at various times may have had responsibility for the disposal, treatment, storage, recycling, or sale of wastes: Bob Marshall and Tom Phair.

10. Canton Walpole Street Facility

Grace refers to the documents attached hereto as Exhibit 8. In addition, on information and belief, the following individuals may have had responsibility at various times for the disposal, treatment, storage, recycling, or sale of wastes: Jim Adams, Randy Olsen, Bob Walsh, Craig Wellington, and Jack White.

11. Danvers Facility

Grace refers to the documents attached hereto as Exhibit 9. However, Grace cannot confirm that the information contained in these documents accurately reflects operations at the Danvers Facility during Grace's ownership of the Facility during the relevant time period.

12. Easthampton Facility

Grace refers to the documents attached hereto as Exhibit 10. In addition, on information and belief, the following individuals at various times had responsibility for the disposal, treatment, storage, recycling, or sale of wastes: Otto Blablaugh, James Grimaldi, Jay Kelly, and Doug Powling.

13. Gloucester – Sea Pak

Grace has identified no information responsive to this Item.

14. Gloucester – Off Shore Fisheries

Grace has identified no information responsive to this Item.

15. Lawrence Facility

Grace has identified no information responsive to this Item.

16. Lexington Hartwell Avenue Facility

Grace has previously provided EPA with information regarding individuals responsible for the waste disposal at the Hartwell Avenue Facility. Grace provided EPA with responsive information in its response to Inquiry 4(a) in Amicon Grace Electronic Divisions' June 29, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

17. Lexington Hayden Avenue Facility

Grace has previously provided EPA with information regarding individuals responsible for the waste disposal at the Hayden Avenue Facility. Grace provided EPA with responsive information in its response to Inquiry 4(a) in Dewey & Almy Division's June 26, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request.

In addition, employees interviewed for the purposes of responding to this Request indicated that the following individuals at various times may have had responsibility for the disposal, treatment, storage, recycling, or sale of wastes: Tom Barry, Barry Conlon, Maureen Dalton, Dave Hanley, Jim Hastie, Sandra Ladoulis, Dick Lee, Steve Lewis, Erik Lind, Walter Maloney, Steve Naugler, Art Porter, and Dick Shaner.

18. Lowell Facility

Grace has identified no information responsive to this Item.

19. Marlboro Facility

Grace has identified no information responsive to this Item.

20. Plainville Facility

Grace has identified no information responsive to this Item.

21. Woburn Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 17.

22. Woburn Holton Street Facility

Grace refers to the documents attached hereto as Exhibit 18. However, Grace cannot confirm that the information contained in these documents accurately reflects operations during Grace's ownership of the Facility during the relevant time period. On information and belief, the following individuals at various times may have had responsibility for the disposal, treatment, storage, recycling, or sale of wastes: John Mertens and Paul Wilts.

23. Woburn Dragon Court/Commonwealth Avenue Building Complex

To the extent that such information is available, Grace has provided EPA with information responsive to this Item 5(a) in its December 9, 1988 response regarding Auburn Road Landfill, Chomerics, Inc.'s April 1, 1991 response regarding Shaffer Landfill, and Chomerics Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Response.

24. Worcester Rockdale Street Facility

Grace has identified no information responsive to this Item.

25. Worcester Millbury Street Facility

Grace has identified no information responsive to this Item.

26. Hudson Facility

To the extent that such information is available, Grace has provided EPA with information responsive to this Item 5(a) in its December 9, 1988 response regarding Auburn Road Landfill, Chomerics, Inc.'s April 1, 1991 response regarding Shaffer Landfill, and Chomerics Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Response.

27. Nashua Facility

Grace has previously provided the Agency with information regarding individuals with responsibility for waste disposal at the Nashua Facility. Specifically, Grace provided EPA with responsive information in its response to Inquiry 11 of its January 29, 1992 response regarding Shaffer Landfill. Grace hereby incorporates all such information responsive to this Item of the Request. In addition, employees interviewed for the purpose of responding to this Request indicated that the following individuals at various times had responsibility for the disposal, treatment, storage, recycling, or sale of wastes: Don Chapman, Bob Cronin, Harry Eschenbach, and Rick Winterson. In addition, on information and belief Carl Erickson at various times had responsibility for the disposal, treatment, storage, recycling, or sale of wastes.

28. Searsport Facility

Grace has identified no information responsive to this Item.

29. Taunton Facility

Grace has identified no information responsive to this Item.

- 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.*

Grace objects to this item of the Request on the grounds that it is vague, redundant, and unduly burdensome. Without waiving its objection, Grace states as follows:

Grace refers to its responses to Items 3(j), 4(f), and 5(a).

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

Grace objects to this item of the Request on the ground that the terms "responsibility" and "environmental matters" are vague and ambiguous. In addition, Grace objects to Item 5(c) as being redundant to Item 5(a). Grace understands this item of the request to seek information concerning persons with responsibility for managing environmental matters such as waste disposal. To the extent that Item 5(c) seeks information regarding individuals with responsibility for environmental matters beyond the scope of those covered by 5(a), Grace objects to Item 5(c) as seeking irrelevant information. Without waiving its objection, Grace states as follows:

Grace refers to its response to Item 5(a), and further states that at present the Vice President for Public and Regulatory Affairs, William M. Corcoran, and the Director of Environment, Health and Safety, Theodore Fasting, have corporate management responsibility for 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;*
 - vi. *the nature of the information possessed by such individuals concerning Respondent's waste management.*

Grace has been unable to locate information responsive to all of the subparts for each of the employees identified. To the extent that information is available, Grace states the following:

Grace refers to its responses to Items 5(a)-(c) and 9(a) and to the document attached hereto as Exhibit 26.

- 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.*

Grace objects to Item 5(e) as being duplicative. Without waiving its objection, Grace states as follows:

Grace refers to its responses to Item 4(c).

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

1. Acton Facility

Grace has previously provided EPA with detailed information regarding disposal practices at the Acton Facility. Grace provided EPA with information responsive to this Item 5(f) in its Report submitted to the Director, Enforcement Division, of U.S. EPA on November 12, 1980, its December 9, 1988 response regarding Auburn Road Landfill and the attachments thereto, and its March 15, 1989 response regarding Charles George Reclamation Trust and the attachments thereto. Grace hereby incorporates by reference all such responsive information.

In addition, Grace states that an additional responsive document indicates that on at least one occasion Grace made arrangements with Suffolk Services for removal of waste from the Acton Facility. The Acton Facility was also identified as the generator of a waste sample, transported by Suffolk Services, in a Waste Product Survey from Cannons Engineering. However, Grace indicated in a May 30, 1986 letter to EPA regarding Cannons Engineering: Bridgewater, MA, that it had no additional information regarding this waste sample. These additional documents are included in Exhibit 22.

2. Adams Facility

Grace has previously provided EPA with information regarding disposal arrangements of the Adams Facility. Grace provided EPA with information responsive to this Item 5(f) in Grace Polyfibrion's January 14, 1993 response regarding SRSNE, and in Grace and Amicon Corporation's response regarding Silresim Chemical Corporation ("Silresim"). Grace incorporates the information contained in those responses herein. Grace also refers to the documents attached hereto as Exhibit 1. In brief, Grace states that during the relevant time period Grace made arrangements for the disposal of wastes with SRSNE, Silresim, Jim Dawson Trucking, R.L. Randall, Clean Harbors, Inc., SCA Chemical Services/Recycling Industries, Inc., and Inland Pollution Control, Inc. Grace may also have made arrangements for disposal with CECOS International, Inc., Environmental Waste Removal, and American Recovery. In addition Adams Facility employees may have hauled waste from the facility at some point during the relevant time period. On information and belief, in approximately 1975 the Adams Facility provided the City of North Adams with a large number of drums. In addition, an employee interviewed for the purpose of responding to this Request recalled that Solvent Recovery Service was used to haul waste from the facility, and indicated that on one occasion he arranged for approximately 600 drums that had been stored behind the Facility to be sent to SRS. Another employee indicated that he believed that a waste hauler removed approximately fifty to eighty drums of waste approximately once every year during the late 1970's. Prior to removal, waste drums were collected in the Adams Facility parking lot and wastes were identified, segregated, and consolidated into a smaller number of drums where possible. The employee indicated that someone at the Facility would contact a waste hauler who would come to the Adams Facility to remove the waste drums, which would be loaded onto the truck by Grace employees.

3. Agawam Facility

Grace refers to the documents attached hereto as Exhibit 2. On information and belief, prior to Grace's ownership of the Facility, some wastes were disposed of on-site at the Agawam Facility, and drummed wastes were disposed of at the Agawam town dump. Also prior to Grace's ownership of the Facility, empty drums may have been donated to the Air National Guard.

Empty drums were crushed for disposal or were removed by Astro Chemical, Inc., although the exact time period during which such arrangements were made is unclear. Solid wastes, including empty non-hazardous material drums, were disposed of in an on-site dumpster and subsequently hauled off-site by Commercial Disposal Company of West Springfield, MA. However, the exact time period during which such arrangements were made is unclear.

In 1985, Grace arranged for the disposal of wastes from the Agawam Facility with Clean Harbors, Inc.

4. Bedford Facility

Grace refers to the documents attached hereto as Exhibit 3. Those documents indicate that ordinary refuse was picked up on a regular basis. Grace has identified no additional information responsive to this Item.

5. North Billerica Facility

Grace has identified no information responsive to this Item.

6. Billerica Facility

Grace refers to the documents attached hereto as Exhibit 5. Grace states that wastes generated from the manufacturing process conducted by Amicon were hauled by Pease and Curran, Inc., for reclamation of the silver used to manufacture Amicon's products. Other wastes were hauled by a licensed waste hauler for disposal.

7. Boston Facility

Grace has identified no information responsive to this Item.

8. Cambridge Facility

Grace has previously provided EPA with detailed information regarding the disposal practices of the Cambridge Facility. Grace provided EPA with information responsive to this Item 5(f) in its December 9, 1988 response regarding Auburn Road Landfill, Grace Special Chemical's March 15, 1989 response regarding Charles George Reclamation Trust, its response to Inquiry 4 of the Construction Products Division's Cambridge facility's June 29, 1992 response regarding Shaffer Landfill, and its Libby Response. Grace hereby incorporates by reference all such information responsive to this Item.

In short, Grace states that those responses indicate that the Cambridge Facility had arrangements with the following facilities, companies or individuals regarding the disposal, treatment, or recycling of wastes during the relevant time period:

Ted Barron as Nu-Way
SCA Services or Sanitas
Charles George Trucking Company
Miller Disposal Company
Browning Ferris Industries
Paul Hillery (Trucking Operation)
Mile Road Dump
Cambridge City Dump
Kingston Sanitary Landfill
Rollins Environmental
John Kelly, Acton Disposal Company
Jet Line Services
Coating Systems, Inc.
Transformer Service, Inc.
Clean Industry
Narragansett Improvement Co.
Emergency Tech Service Corp.
Peabody Clean Industries.

Additional documents, attached hereto as Exhibit 23, indicate that the Cambridge Facility may also have arranged with Shaffer Paper Fibres, Inc., Suffolk Services, Inc., and Keefe Environmental Services for the disposal, treatment, or recycling of wastes.

9. Canton Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 7. In brief, Grace states that the Washington Street Facility arranged with Chemical Waste Management for the disposal of wastes.

10. Canton Walpole Street Facility

Grace refers to the documents attached hereto as Exhibit 8. In summary, Grace states that during the relevant time period the Walpole Street Facility arranged for the disposal, treatment, or recycling of wastes with Browning Ferris Industries, Chemical Waste Management, Jet Line Services, Clean Harbors, and SCA Chemical Services. Clean scrap foam was removed from the Facility by Clark Foam. In addition, Grace states that in 1986 and 1987 Grace arranged with Northeast Solvents Corp. and Ryan Barrel Co., Inc., for the disposal of empty drums which had accumulated at the Walpole Street Facility.

11. Danvers Facility

Grace refers to the document attached hereto as Exhibit 9, which indicates that a construction company working at the Danvers Facility may have made arrangements with Suffolk Services for the disposal of construction wastes. Grace has identified no additional information responsive to this Item.

12. Easthampton Facility

Grace refers to the documents attached hereto as Exhibit 10. In particular, Grace refers to its July 22, 1988 response to MA DEQE's request for information regarding the Oliver Street Landfill, which states that waste generated at the Easthampton Facility was removed by M.T. Sullivan Co. Inc., Chicopee, MA; Curtis L. Swenor, Easthampton, MA; H.R. Dietz Jr. & Sons, Easthampton, MA; Leger's Rubbish Removal Corp., West Springfield, MA; Waste Management of Mass., Inc., West Springfield, MA; and Commercial Disposal Co., Inc., West Springfield, MA.

Employees interviewed for purposes of responding to this Request stated that Legers, Commercial Disposal, and Waste Management were used to haul wastes from the Facility. On information and belief, wastes were disposed of at the Easthampton Landfill and the Springfield, Chicopee and Grandville dumps.

13. Gloucester – Sea-Pak

Grace has identified no information responsive to this Item.

14. Gloucester – Off Shore Fisheries

Grace has identified no information responsive to this Item.

15. Lawrence Facility

Grace has identified no information responsive to this Item.

16. Lexington Hartwell Avenue Facility

Grace has previously provided EPA with information regarding the disposal practices of the Hartwell Avenue Facility. Grace provided EPA with information responsive to this Item 5(f) in Amicon Grace Electronic Materials' June 29, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request. In brief, that response indicates that the Hartwell Avenue Facility, and possibly other facilities operated by Amicon Grace Electronic Materials, arranged for the disposal of wastes with the following individuals or companies during the relevant time period:

Chemical Waste Management
Browning Ferris Inc.
Pease & Curren
Solvents Recovery Service

The response also indicates that the following additional transporters or facilities were used during the years 1983-1986:

Clean Harbors Natick

SCA Chemical Services (CWM)
Clean Harbors Braintree

Additional documents, attached hereto as Exhibit 13, indicate that the Hartwell Avenue Facility may have also made arrangements for waste disposal with Suffolk Services during the relevant time period.

17. Lexington Hayden Avenue Facility

Grace has previously provided EPA with extensive information regarding the disposal practices of the Hayden Avenue Facility. Grace provided EPA with information responsive to this Item 5(f) in its December 9, 1988 response regarding Auburn Road Landfill, its March 16, 1989 response regarding the L&RR Site, and in its response to Inquiry 4(c) of the Dewey and Almy Division's June 26, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item. In summary, the information provided in those responses indicates that Grace contracted with Miller Disposal and Browning Ferris Industries to remove trash from dumpsters located at the facility, and that hazardous waste haulers were contracted on call to pick up hazardous waste shipments. Waste haulers used during the relevant time period included:

Suffolk Services, Inc.
Recycling Industries, Inc.
Northeast Solvents Corp.
Chemical Waste Management, Inc.
Coating Systems, Inc.
Emergency Technical Services Corp.
GSX Services, Inc.
SCA

Additional documents attached as Exhibit 24 indicate that the Hayden Avenue Facility may also have arranged for wastes to be transported to Keefe Environmental Services for disposal. In addition, the responses referenced above indicate that some wastes generated at the Hayden Avenue Facility may have been disposed of at the Acton facility landfill. Additionally, the responses indicate that some employees recall that Suburbanite Cesspool was hired to clean out sewer wastewater sludge from a retention pit.

Employees interviewed for the purpose of responding to this information request stated that wastes were removed from the facility every 90 days. One employee estimated that approximately ten to fifteen drums were removed from the Hayden Avenue Facility approximately every 90 days. In addition, employees stated that laboratories were cleaned out, and wastes disposed of, approximately once per year. One employee stated that John Kelly, an independent waste hauler previously identified as having hauled waste from the Cambridge Facility, would be called to remove wastes from the Hayden Avenue Facility when removal was

needed. Another employee indicated that Clean Harbors and Northeast Solvents were used to haul wastes, while BFI was used to dispose of trash.

18. Lowell Facility

Grace has identified no information responsive to this Item.

19. Marlboro Facility

Grace has identified no information responsive to this Item.

20. Plainville Facility

Grace refers to the documents attached hereto as Exhibit 16. Those documents indicate that for some period prior to 1990, process wastewater was discharged into on-site cesspools. Grace has identified no additional information responsive to this Item.

21. Woburn Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 17. On information and belief, trash was removed from the Facility on a daily basis by an independent waste hauler named Frank Sarno. On information and belief, Frank Sarno hauled non-hazardous trash and drums from Washington Street Facility. On information and belief, the Facility may have also arranged for the disposal of wastes with the Axton Cross Company and the Woburn Oil Company. Employees deposed in the course of the Anderson v. Cryovac litigation indicated that the Axton Cross Company hauled drums away approximately once or twice per year during the 1980's. That employee believed that drums were removed during the 1970's as well, and assumed that the Axton Cross Company was the hauler during that time period. On information and belief, Eastern Chem-Lac may also have removed barrels of waste from the Facility, some empty barrels may have been returned to Mobil in exchange for return of a deposit. Employees also indicated that arrangements were made for individuals who recycled metal to remove scrap materials from the facility, but employees had no recollection regarding the names of such individuals. The deposition of John Whitney, III, who was also deposed in the course of the Anderson v. Cryovac litigation, stated that Grace was never a customer of Whitney Barrel.

22. Woburn Holton Street Facility

Grace refers to the documents attached hereto as Exhibit 18. In brief, those documents indicate that the Holton Street Facility made arrangements for waste disposal with Suffolk Services, Re-Solve, Inc., and Silresim Chemical Corporation. In addition, Grace refers to the June 24, 1992 memo, previously submitted in Amicon Grace Electronic Materials' June 29, 1992 response regarding Shaffer Landfill, which Grace understands may include information regarding the waste disposal arrangements of the Holton Street Facility.

23. Woburn Dragon Court/Commonwealth Avenue Building Complex

Grace has previously provided EPA with information regarding the disposal practices of the Dragon Court Facility. Grace provided EPA with information responsive to this Item 5(f) in its December 9, 1988 response regarding Auburn Road Landfill and Chomerics Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request. In summary, Grace states that, based on information and belief, Charles George removed trash from the facility beginning in 1973 and continuing until 1982. In addition, these responses indicate that wastes were also removed from the facility by Chemical Waste Management, Inc., SCA Disposal Services, and GSX Corp. of New England.

24. Worcester Rockdale Street Facility

Grace has identified no information responsive to this Item.

25. Worcester Millbury Street Facility

Grace has identified no information responsive to this Item.

26. Hudson Facility

Grace has previously provided the Agency with information regarding the disposal practices of the Dragon Court Facility. Grace has provided EPA with information responsive to this Item 5(f) in Chomerics, Inc.'s April 1, 1991 response regarding Shaffer Landfill and Chomerics Inc.'s January 28, 1992 response regarding Shaffer Landfill. Grace hereby incorporates by reference all such information responsive to this Item of the Request. In summary, Grace states that such documents indicate that during the relevant time period the facility arranged with BFI for the removal of wastes from the facility. Such documents also indicate that Coating Systems Inc. transported waste from the facility during fiscal year 1985-1986.

27. Nashua Facility

Grace has previously provided the Agency with extensive documentation regarding the disposal arrangements of the Nashua Facility. Grace provided EPA with information responsive to this Item 5(f) in its December 1, 1982 letter regarding Keefe Environmental Services, Inc., its September 29, 1983 response regarding Silresim Chemical Corporation, its December 9, 1988 response regarding Auburn Road Landfill and its December 24, 1988 supplement thereto, its December 20, 1988 response regarding Burns Hill Road Site and its January 30, 1989 thereto, Grace Specialty Chemical Co.'s March 15, 1989 response regarding Charles George Reclamation Trust, and its April 1, 1991 and January 29, 1992 responses regarding Shaffer Landfill. Grace hereby incorporates all such information responsive to this Item of the Request. In addition, Grace refers to the documents attached as Exhibit 20.

In summary, Grace states that these documents indicate that during the relevant time period Grace made arrangements with the following individuals, companies, or facilities, for the disposal of wastes generated at the Nashua Facility:

Acton Facility Landfill
Earl's Rubbish Disposal, Inc.
Earl Burton or Barton
Browning Ferris Industries
Keefe Environmental Services, Inc.
CECOS International, Inc.
Buffalo Fuel Corp.
Niagara Industrial Warehousing
Interex Corp.
Rollins Environmental Services
Recycling Industries, Inc.
Environmental Waste Resources, Inc.
SCA Chemical Services
Clean Harbors Industries
Nashua Landfill

In addition, Grace states that some wastes were disposed of on-site in a lagoon or in drums. Additionally, some wastes were disposed of at the Rodgers Mobile Home Park Site, the Silresim Chemical Corporation Site, and the Charles George Landfill, although it is not clear whether Grace arranged for disposal at those locations. In addition, Grace refers to its response to Item 7 of this Request.

28. Searsport Facility

Grace has identified no information responsive to this Item.

29. Taunton Facility

Grace has identified no information responsive to this Item.

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

Grace refers to its responses to Item 5(f).

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

1. Acton Facility

Grace refers to its response to Item 5(f). In addition, Grace states that much of the waste generated at the Acton Facility was deposited in on-site lagoons and/or at the Acton Facility Landfill, which was owned and operated by Grace during much of the relevant time period.

2. Adams Facility

Grace refers to its response to Item 5(f). In addition, Grace states that the responses cited therein indicate that Adams Facility wastes were disposed of at the North Adams Sanitary Landfill and the Adams Sanitary Landfill.

3. Agawam Facility

Grace refers to its response to Item 5(f).

4. Bedford Facility

Grace has identified no information responsive to this Item.

5. North Billerica Facility

Grace has identified no information responsive to this Item.

6. Billerica Facility

Grace refers its response to Item 5(f).

7. Boston Facility

Grace has identified no information responsive to this Item.

8. Cambridge Facility

Grace refers to its response to Item 5(f). In summary, Grace states that wastes from the Cambridge Facility were disposed of in an on-site lagoon, in an on-site trash incinerator, off-site at the Grace Acton Facility, at Mile Road Dump, Cambridge City Dump, and Kingston Sanitary Landfill. Grace also states that documents previously provided to the Agency indicate that a drum reconditioning plant was located at the Cambridge Facility at some point during the relevant time period, however Grace has identified no further details regarding its operations.

9. Canton Washington Street Facility

Grace refers to its response to Item 5(f).

10. Canton Walpole Street Facility

Grace refers to its response to Item 5(f).

11. Danvers Facility

Grace refers to its response to Item 5(f).

12. Easthampton Facility

Grace refers to its response to Item 5(f).

13. Gloucester – Sea-Pak

Grace has identified no information responsive to this Item.

14. Gloucester – Off Shore Fisheries

Grace has identified no information responsive to this Item.

15. Lawrence Facility

Grace has identified no information responsive to this Item.

16. Lexington Hartwell Avenue Facility

Grace refers to its response to Item 5(f).

17. Lexington Hayden Avenue Facility

Grace refers to its response to Item 5(f).

18. Lowell Facility

Grace has identified no information responsive to this Item.

19. Marlboro Facility

Grace has identified no information responsive to this Item.

20. Plainville Facility

Grace refers to its response to Item 5(f).

21. Woburn Washington Street Facility

Grace refers to its response to Item 5(f). In addition, Grace states that on information and belief, Frank Sarno disposed of wastes primarily in the Billerica dump. In addition, Grace states that on information and belief, certain wastes from the facility were disposed of through the Town of Woburn sewer system. In addition, on information and belief, unknown quantities of wastes were disposed of on site at the Washington Street Facility. Such wastes may have been disposed of by being poured or placed on the ground at the site. Some number of drums were disposed of by being buried on the site and were the subject of an investigation and removal in the early 1980's.

22. Woburn Holton Street Facility

Grace refers to its response to Item 5(f).

23. Woburn Dragon Court/Commonwealth Avenue Building Complex

Grace refers to its response to Item 5(f). In addition, Grace refers to Chomerics, Inc.'s January 28, 1992 response, which indicates that prior to Grace's ownership, some amount of wastes was disposed of on site at the Dragon Court Facility.

24. Worcester Rockdale Street Facility

Grace has identified no information responsive to this Item.

25. Worcester Millbury Street Facility

Grace has identified no information responsive to this Item.

26. Hudson Facility

Grace refers to its response to Item 5(f).

27. Nashua Facility

Grace refers to its response to Items 5(f).

28. Searsport Facility

Grace has identified no information responsive to this Item.

29. Taunton Facility

Grace has identified no information responsive to this Item.

- 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).*

Grace refers to its responses to Items 5(f) through 5(h).

- 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.*

Grace has reason to believe that four of the relevant facilities may have transported wastes away from their operations. As Grace has no information indicating that any other facilities transported their own wastes, Grace has only provided responses for the three facilities. Grace responds as follows:

1. Adams Facility

Grace refers to its response to Item 5(f).

3. Agawam Facility

On information and belief, prior to Grace's ownership of the Agawam Facility, employees used a truck to haul wastes to a local dump.

11. Easthampton Facility

Grace refers to the documents attached hereto as Exhibit 10. In particular, Grace refers to its July 22, 1988 response to MA DEQE's request for information regarding the Oliver Street Landfill, which indicates that wastes may have been disposed of by Grace employees. In addition, an employee interviewed for purposes of responding to this Request indicated that employees would occasionally haul wooden palettes to the Easthampton Landfill for disposal. The employee also indicated that from time to time employees would remove empty drums from the facility for their own personal use.

21. Woburn Washington Street Facility

Grace refers to the documents attached hereto as Exhibit 17. In summary, Grace states that one employee deposed in the course of the Anderson litigation stated that on at least one occasion he removed approximately six to eight empty drums from the facility for his own personal use.

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

For available information, Grace refers to its Responses to Items 5(f) through 5(h).

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

For available information, Grace refers to its Responses to Items 5(f) through 5(h).

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

Grace objects to Item 5(m) as being unduly burdensome. Grace also objects on the ground that this Item of the request is redundant of Item 5(f)-(l). Without waiving this objection, Grace states as follows:

For available information, Grace refers to its Responses to Items 5(f) through 5(h).

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

Grace objects to Item 5(n) as being unduly burdensome. Grace also objects on the ground that this Item of the request is redundant of Item 5(f)-(l). Without waiving this objection, Grace states as follows:

For available information, Grace refers to its Responses to Items 5(f) through 5(h).

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

Grace refers to its Responses to Items 5(f) through 5(h).

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

For available information, Grace refers to its Responses to Items 5(f) through 5(h).

- q. *indicate the ultimate disposal/recycling/treatment location for each type of waste.*

Grace refers to its Responses to Items 5(f) through 5(h).

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

Grace refers to its Responses to Items 5(f) through 5(h).

- 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.*

Grace objects to Item 5(s) as being unduly burdensome. Grace also objects on the ground that this Item of the request is redundant of Items 5(f)-(r). Without waiving this objection, Grace states as follows:

Grace refers to its responses to Items 5(f) through 5(h).

- 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.*

For available information, Grace refers to its responses to Items 5(f) through 5(h).

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

Grace refers to its responses to Item 5(t).

- 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.*

Grace objects to Item 5(v) as being unduly burdensome. Grace also objects on the ground that this Item of the request is redundant of Item 5(b). Without waiving this objection, Grace states as follows:

Grace refers to its responses to Item 5(b).

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.*

Due to the extended period of time that has passed since the time period being investigated, coupled with the fact that Grace no longer owns or conducts business at the large majority of the relevant facilities, Grace has identified no information responsive to this Item 6(a) for many of the relevant facilities. To the extent that relevant information is available, Grace states as follows:

<u>Address</u>	<u>RCRA Number</u>
Harmony Street Adams, MA	MAD002081651
21 Ramah Circle Agawam, MA	MAD057989246
869 Washington Street Canton, MA	MAD000843920
59 Walpole Street Canton, MA	MAD000361709
62 Whittemore Avenue Cambridge, MA	MAD001409150
Wemelco Way Easthampton, MA	MAD019335561
Hartwell Avenue Lexington, MA	MAD019292846
Hayden Avenue Lexington, MA	MAD076624311
Dragon Court/Commonwealth Avenue Woburn, MA	MAD001419514
Holton Street Woburn, MA	MAD019495309
Flagstone Drive Hudson, NH	NHD048727994
Poisson Avenue Nashua, NH	NHD048724173

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

Grace objects to this item of the Request on the grounds that it is unduly burdensome and duplicative. Grace has provided the Agency with much of the responsive information in its responses to prior information requests and in the

documents attached hereto as exhibits to the current Request. In addition, due to the extended period of time that has passed since the time period being investigated, coupled with the fact that Grace no longer owns or conducts business at the large majority of the relevant facilities, for many of the relevant facilities Grace has identified no information responsive to this Item 6(b). Without waiving these objections, Grace states as follows:

Grace refers to the document attached hereto as Exhibit 27.

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

Grace refers to its response to Item 6(b).

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

Grace refers to its response to Item 6(b).

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

Grace refers to its response to Item 6(b).

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, 42U.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.*

Grace refers to its response to Item 6(b).

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.*

Grace refers to its response to Item 6(b).

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.*

After a diligent search, Grace has located only a small number of documents, attached hereto as Exhibit 28, which appear to reflect the existence of any business relationship with Whitney Barrel. Grace has identified one former employee who believes that at some point in the mid-1970's the Nashua Facility may have provided barrels to John Whitney. However, the number, contents, or prior contents of such barrels is not known.

Grace has, in this response and in prior responses to requests for information regarding other sites, identified more than fifty waste haulers and disposal facilities used by Grace during the relevant time period. None of these have included Whitney Barrel as a waste hauler or disposal facility. This fact and the very small number of documents indicating a relationship between Grace and Whitney Barrel demonstrate that Grace had only a very limited number of transactions with Whitney.

- 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.*

On information and belief, Grace may have purchased barrels from Whitney Barrel on at least two occasions during the early 1980's. Based on two vendor purchase listings apparently identifying all Dewey and Almy vendors for the periods ending December 31, 1981 and June 18, 1982, included in Exhibit 28, the Dewey and Almy Chemicals Division paid Whitney Barrel \$215.00 and \$300.00 respectively. Vendor purchase listings for the periods ending June 19, 1981, December 31, 1980, June 20, 1980, March 21, 1980, and December 31, 1979, did not reflect any transactions with Whitney Barrel.

Based on interviews with employees familiar with Grace's billing practices, Grace believes that the transactions relate to the Lexington Hayden Avenue Facility or the Cambridge Facility. The attached vendor purchase listings indicate that they pertain to the Dewey and Almy Chemicals Division. Employees interviewed stated that during the time frame represented by the documents, the Dewey and Almy Chemicals Division used a different accounting system than did the Polyfibron, Organic Chemicals, and Construction Products Divisions. An employee also indicated that at the time, accounting for Emerson and Cuming, a part of the Dewey and Almy Chemicals Division, was performed in Canton and was also kept separate from the Dewey and Almy Chemicals Division accounting. Thus, the vendor purchase listings appear to relate to Dewey and Almy Chemicals accounts payables and/or purchasing. At the time, the Lexington Hayden Avenue Facility and the Machine Shop at the Cambridge Facility were the only facilities in New England at which Dewey and Almy Chemicals Division conducted operations, and thus were likely the only facilities that would have transacted business with Whitney Barrel.

According to employees, the aforementioned documents indicate the amount paid to Whitney Barrel during the time periods, but do not provide any information regarding whether the figures represent accounts payable and/or purchasing. Employees who worked at the Lexington Hayden Avenue Facility stated that they believed that the figures likely represent the purchase of drums from Whitney Barrel rather than payments to Whitney Barrel to remove wastes or waste containers. As described earlier in the Request, employees interviewed for purposes of responding to this Request recalled that the Hayden Avenue Facility received empty drums from time to time which were used to collect wastes and were removed by licensed haulers when full. The employees also stated that because the facility required a greater number of drums to collect and dispose of waste materials than the number of drums in which it received raw materials, and because the Facility reused drums in which it received raw materials to collect waste, the Hayden Avenue Facility would likely not have had a surplus of empty drums for which it needed removal or recycling services.

One employee familiar with the operations of the Machine Shop at the Cambridge Facility indicated that that shop used a small number of barrels to collect waste rags and oil, with one barrel being filled approximately every two months. On information and belief, such barrels were disposed of along with other Cambridge Facility wastes.

Grace also located a small number of accounts payable check registers, attached as Exhibit 28, which appear to reflect payments to Whitney Barrel. While two of these documents likely reflect payments included in the vendor purchase listing documents described above, the other two documents may reflect additional payments to Whitney Barrel. Because these two payments do not appear to have been included in the vendor purchasing listings for Dewey and Almy, Grace believes that these payments may reflect payments made by another business unit of the Industrial Chemical Group, which, on information and belief, included the

Dewey and Almy, Polyfibron, Construction Products, and Organic Chemical business units. Grace had not located any additional information regarding 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.*

After a diligent search through Grace's records for the vendor name Whitney Barrel, as well as for the vendor numbers used to identify that company, Grace has not located any document reflecting shipment or sale of barrels to Whitney Barrel. A former employee interviewed for purposes of responding to this request stated that, to the best of his current recollection, on at least one occasion the Nashua Facility had drums removed by Whitney Barrel. The employee recalled that the incident was related to an attempt to make space at the facility for an expansion. The employee stated that perhaps one hundred drums were involved, but was unsure of the contents or prior contents of the drums that were provided.

- 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.*

Please refer to Grace's response to Items 7(a)-(c) of this Request. Grace has not identified any instance of reconditioning or cleaning of drums by Whitney Barrel.

- 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.*

On information and belief, the Nashua Facility rented a tractor from Whitney Barrel early in 1974. An invoice from April, 1974, attached as Exhibit 28, indicates that the Industrial Chemicals Group paid \$72.00 to Whitney Barrel for a six hour tractor rental. A former employee described the provision of an above-ground fuel storage tank to the Nashua facility in the early 1970s by Whitney Barrel.

- 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.*

No.

- 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.

- 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.

- 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.*

In connection with the foregoing questions 7(a) – 7(h), Grace conducted interviews with Tom Barry, Paul Hanlon, John Hession, and Greg Manning regarding the information contained in the documents attached hereto as Exhibit 28. Those individuals were contacted because they are current Grace employees who are knowledgeable regarding accounting practices during the relevant time period. In addition, Grace conducted additional interviews with individuals who were employed in the Shipping and Receiving Department at the Hayden Avenue Facility, including Jim Hastie, Barry Conlon, and Dick Lee, a former employee. However, none of those individuals recalled the Hayden Avenue Facility having done business with Whitney Barrel. Grace also spoke with Tom Barry regarding operations of the Machine Shop at the Cambridge Facility. In addition, Grace spoke with Carl Erickson, a former Grace employee who was employed at the Nashua Facility.

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.*

Grace possesses copies of certain documents that appear to reflect investigations of Whitney Barrel Company by regulatory agencies in the 1970s or 1980s. Grace assumes that EPA already possesses all such documents, but would be pleased to make copies of such documents available to EPA at EPA's request.

- 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.*

Grace has no other information responsive to any of the subparts of this Item of the Request.

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;*

In response to Items 9(a)(i) through 9(a)(iv), Grace states that it consulted the following Grace employees:

Tom Barry – Director of Facility Services, Cambridge, MA.

Plant Accountant, Acton Facility, 1967-1971.
Staff Accountant, Cambridge Facility, 1971-1972.
Office Manager, Dewey and Almy, Cambridge Facility, 1972.
Office Manager, Woodbury, NJ, 1972-1978.
Production Manager, Woodbury, NJ, 1978-1979.
Plant Manager, California Facility, 1979-1983.
Facilities Manager and Machinery Manager, Hayden Avenue Facility, 1983-2000.
Director of Facility Services, Cambridge Facility, 2000-present.

Robert Bettachi – President of Construction Products Division and Darex Division, Cambridge, MA.

Commercial Development Analyst; Sales Manager; Sales and Marketing, Letterflex Product Line, Hayden Avenue, 1974 - 1979.
Marketing, Construction Products Division acquisition in California, Cambridge Facility, 1979-1986.
General Manager, Construction Products Division, Cambridge Facility, 1986-1990.
President, Construction Products Division, Cambridge Facility, 1990-1992.
President, Global Construction Products Division, Cambridge Facility, 1992-1998.

Gregory Ciampa – North American Sales Manager, Underlayments and Tapes, Specialty Building Materials Group, Cambridge, MA.

Accountant, Polyfibron Division, Burlington Office, 1974.
Accountant, Hayden Avenue Facility, 1974-1977.

Controller; Assistant Plant Superintendent; Assistant Plant Manager, Adams Facility, 1977-1982.

Construction Products Division, Cambridge Facility, 1982-1986.

Group Product Manager, Cambridge Facility, 1986.

General Manager, Special Business Unit, Coplane Polycell Product, 1986-1991.

Manager of Manufacturing and Engineering for North America, Dewey and Almy Division, Hayden Avenue Facility, 1991-1995. Other employment, 1995-2002.

Barry Conlon – Purchasing Department, Construction Products Division, Cambridge, MA.

Mailroom and Laboratory Stockroom Attendant, Hayden Avenue Facility, 1975-1978.

Print Shop, Cambridge Facility, 1978-1980.

Manager, Shipping and Receiving Department, Hayden Avenue Facility, 1980 - 1985.

Purchasing Department, Construction Products Division, Cambridge Facility, 1985-present.

Maureen Dalton – Global Technical Control Office, Cambridge, MA.

Research Chemist, Dewey and Almy Division, Cambridge Facility, 1970-1975.

Research Chemist, Dewey and Almy Division, Hayden Avenue Facility, 1975-1981.

Manufacturing Technical Services, Hayden Avenue Facility, 1981-1985. During this time, became responsible for Government Controls, including product compliance activities, completing OSHA data sheets, and ensuring compliance with OSHA and TSCA.

Process Development, Hayden Avenue Facility, 1985-late 1990's.

Returned to Cambridge Facility, late 1990's or 2000.

Carl Erickson -- Former Employee

Employee, Acton Facility, 1962-1967.

Employee, Nashua Facility, 1970-1981.

Mario Favorito -- Vice President and Chief Counsel (Cambridge) for W.R. Grace & Co.-- Conn., Cambridge, MA.

Counsel, 1970-present.

James Grimaldi – Technical Field Advisor, Cambridge, MA.

Worker, Easthampton Facility, 1974-1978.

Production Supervisor, Easthampton Facility, 1978-1979.

Plant Manager, Easthampton Facility, 1979-1989.

Paul Hanlon – Vice President, Business and Development, Cambridge, MA.

Account Manager for Walpole Street Canton Facility, located at Washington Street Canton Facility, 1981-1984.
Manager of Cost Accounting, Dewey and Almy Division, Hayden Avenue Facility, 1984-1985.
Assistant Comptroller, Dewey and Almy Division, Dragon Court Facility, 1985-1990.
Manager, Financial Planning and Analysis, Dewey and Almy Division, 1990-1993.
Manager, Financial Planning and Analysis, Construction Products Division; Vice President, Business and Development, Cambridge Facility 1993-present.

Jim Hastie – Manager, E-Business Technology, Cambridge, MA.

Mail Room, Cambridge Facility, 1971-1972.
Lab Technician, Polyfibron Division, Cambridge Facility, 1972-1974.
Assistant, Shipping and Receiving, Hayden Avenue Facility; Head of Office Services, Hayden Avenue Facility, 1974-1981.
Junior Buyer, Cambridge Facility, 1981-1986.
Purchasing Department, Cambridge Facility, 1986-1995.
Information Technology Department, 1995.

John Hession – Financial Leader, Darex Product Line, Cambridge, MA.

Staff General Accountant, Walpole Street Canton Facility, 1982-1985.
Staff General Accountant, Hayden Avenue Facility, 1985-1987.
Plant Comptroller, Holton Street Woburn Facility, 1987-1988.
Plant Comptroller, Washington Street Canton Facility, 1988-1991. Accountant, Darex Worldwide, Hayden Avenue Facility, 1991.

Dick Lee -- Former employee.

Worker, Cambridge Facility, 1953-Sept. 1981.
Courier, Cambridge Facility, 1981-Feb. 1982.
Shipping and Receiving, Hayden Avenue Facility, 1982-1998.

Greg Manning – Cost Accounting Manager, Cambridge, MA..

Coop Student, Washington Street Canton Facility, 1985-1986.
Staff Accountant, Hayden Avenue Facility, 1986-1988.
Staff Accountant, Holton Street Woburn Facility, 1988-1992.
Other employment, 1992-2001.

Dave Magner -- Senior Applications Supervisor, Cambridge, MA.

Lab Technician, Customer Service Department, Cambridge Facility, 1970-1973.
Lab Technician, Customer Service Department, Hayden Avenue Facility, 1973-1975.

Supervisor of Technical Service, Applications Laboratory; Senior Applications Supervisor, 1975-present.

Pat Moran – Vice President, FCC Manufacturing

Production Supervisor, Adams Facility, 1976-1977.
Production Superintendent, Adams Facility, 1977-1978.
Plant Manager, various locations.

Doug Powling – Plant Manager, Pompano Beach, FL.

Assistant Plant Manager; Plant Manager, Easthampton Facility, 1974-1979.
Plant Manager, Pompano Beach, FL, 1979-present.

Dave Smith – Director of Research, Darex Product Line, Cambridge, MA

Research and Development Laboratory, Cambridge Facility, 1967-1972.
Research and Development Laboratory, Hayden Avenue Facility, 1972-2001.
Director of Research, Cambridge Facility, 2001-present.

Bob Sorrentino –Cambridge, MA.

Columbia, MD, 1972-1974.
Customer Service Manager, Polyfibron Division's Letterflex Product Line, Hayden Avenue Facility, 1974-1985.
Marketing, Battery Separator product line, 1985-1989.
General Manager, Composite Materials, Walpole Street Canton Facility, 1989-1994.

John Stankiewicz – Laboratory Technician, Construction Products Division, Cambridge, MA.

Part-time Laboratory Technician, Polyfibron Division, Hayden Avenue Facility, 1981-1983.
Laboratory Technician, Dewey and Almy Division, Darex Product Line, Hayden Avenue Facility, 1983 - 1999.
Laboratory Technician, Construction Products Division, Cambridge, MA, 1999-present.

Dave Steiner – Manager of Project Engineering, MA.

Project Engineer, Cambridge Facility, 1974-1976.
Project Engineer, Hayden Avenue Facility, 1976-1978.
Production and Maintenance Supervisor, Dewey and Almy, Chicago, 1978-1981.
Manager of Project Engineering, Dewey and Almy, Hayden Avenue Facility, 1981-1999.

- 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.*

In response to Items 9(a)(v) through 9(a)(viii), Grace states the following:

In order to assemble a list of facilities in the four states that were owned or operated by Grace during the relevant time period, Grace reviewed available corporate directories from the relevant time period. The available directories were from the following years: 1963, 1965-1969, 1971-1974, 1976-1985. In addition, existing real estate files in Cambridge and product guides from the relevant time period were reviewed. The only such available files and guides were from 1966 and 1968. This information produced a list of twenty-nine facilities, excluding retail and restaurant listings. Corporate transaction files in Cambridge and Columbia, MD were reviewed to obtain information regarding acquisitions and divestitures of businesses related to the relevant facilities.

Files located in Memphis, TN were reviewed for information related to the Agricultural Chemicals Facility in Searsport, ME. Information contained in previous 104(e) responses from the relevant facilities was believed to be potentially relevant to the current Request. Thus, legal files in Cambridge and Grace's offsite storage location were reviewed to locate copies of previous responses.

In order to obtain additional information on the relevant facilities, dead storage files in Woburn, Cambridge, and an offsite storage location were reviewed. The files located in Woburn contain accounting records which were shipped from the Hayden Avenue Facility when it was sold. The database of these files was searched for accounts payable records from the relevant time period. Approximately 40 boxes out of over 4000 were found to be from before 1986 and have an accounts payable description. Those boxes were located and reviewed in Woburn. A list of boxes located in Cambridge and offsite storage that needed to be reviewed was generated by searching the record retention spreadsheet, reviewing paper copies of record retention slips for boxes which were not part of the record retention spreadsheet, and physically inspecting boxes in several Cambridge dead storage locations. The focus of this search was accounts payable related boxes with keyword searches including A/P, vendor, invoice, and various Grace businesses related to the relevant facilities. The information search was discussed with several Accounting Department employees in order to confirm that no additional locations and or files were likely to contain responsive information. These individuals indicated that it was their understanding that accounting files from the relevant time period were destroyed pursuant to the normal record retention policy guidelines. Additionally, these same sources of files were

reviewed to determine if they contained facility specific information responsive to the Request and a number of boxes were reviewed for such information.

In addition, an index of over three hundred boxes of materials related to the Anderson v. Cryovac was reviewed. Approximately twenty-five of those boxes which appeared to relate to operations, waste streams, and/or waste disposal practices at the Washington Street Facility were retrieved from storage. The contents of the boxes were reviewed, and relevant information, including reports from investigations, facility internal documents, and employee depositions, were reviewed. Employee depositions were selected for review based on a determination of the likelihood of the individual having relevant information, with consideration being given to the position the individual held at the Facility.

Grace also obtained information from outside counsel for two facilities regarding which Grace's counsel has been conducting discovery on an unrelated matter.

In order to prepare for interviews of employees, the names of employees listed for any relevant facility in the corporate directories were combined with the names of employees listed on previously submitted 104(e) responses for the relevant facilities. This list was then sent to the Human Resources Department in Columbia, MD, and current status and contact information was requested for the entire list. All current employees on the combined list were interviewed. Follow-up interviews were conducted where necessary. Interviews of additional current Grace employees were conducted where those employees were identified as being likely to have additional relevant information. On two occasions, former employees were contacted where those individuals were believed to have specific information relevant to the current Request.

WELLS G&H

ENCLOSURE H - DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of W.R. Grace & Co.-Conn. and that, based on the investigation conducted by Grace personnel and relying on information provided to me by such personnel, the foregoing is a complete, true, and correct response to the best of my knowledge.

Executed on April 27, 2004

Lydia B. Duff
Signature

LYDIA B. DUFF
Type Name

Senior Environmental Counsel
Title (if any)