GRACE

Polyfibron Division
W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173
(617) 861-6600

February 6, 1985

Ms. Nancy Sicliano
Compliance Branch - Room 2109
Water Management Division
U.S. Environmental Protection Agency
J.F. Kennedy Federal Building
Boston, Massachusetts 02203

Dear Ms. Sicliano:

RE: MAG250000

As a follow up to our conversations of January 29 and 30, this letter confirms that the Notice of Intent filed September 24, 1984 and the supplementary information Grace sent to you on January 10, 1985 was only for the discharge of non-contact cooling water from the Grace plant in Adams. Any reference to storm water in the above correspondences was unintentional. The words storm water were included because I thought the General Permit included both types of discharge. A check of Grace's previous permits (#MA0006009) would show that only non-contact cooling water discharge has been permitted.

I hope this information is sufficient, and I apologize for any inconvenience or misunderstanding.

Sincerely,

Gary W. Siegel

Gary W. Siegel
Environmental Engineer

GWS/mlr/33

cc: A. T. Michaud - Grace/Adams

a. The pH of the effluent shall not be less than nor greater than the range given for the receiving water classifications, unless these values are exceeded due to natural causes.

Classification	Range
B	6.5 - 8.0
C	6.5 - 9.0

B. MONITORING AND REPORTING

1. ~~P~~eporting

Monitoring results obtained during the previous 6 months shall be summarized for each quarter and reported on separate Discharge Monitoring Report Form(s) postmarked no later than the 15th day of the month following the completed reporting period. The reports are due on the 15th day of January and July. The first report may include less than the 6 months information.

Signed copies of these, and all other reports required herein, shall be submitted to the Director and the State at the following addresses:

Permit Compliance Section [WR/PC-2103]
Compliance Branch
Water Management Division
Environmental Protection Agency
JFK Federal Building
Boston, MA 02203

The State Agency to receive the copy is the appropriate Regional Office:

Massachusetts Division of Water Pollution Control
Western Regional Office
436 Dwight Street
Springfield, MA 01103

Massachusetts Division of Water Pollution Control
Southeastern Regional Office
Lakeville Hospital
Lakeville, MA 02346

Massachusetts Division of Water Pollution Control
Eastern Regional Office
~~323 New Boston Street~~ 5 Commonwealth Ave
Woburn, MA 01801

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (See Cuss Tower)

1. During the period beginning on the effective date and lasting through expiration, the permittee is authorized to discharge from each outfall of non-contact cooling water to a drainage basin classified as a warm or cold water fishery as designated below. Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristic	Discharge Limitations				Monitoring Requirements	
	kg/day (lbs/day)		Other Units (Specify)		Measurement	Sample
	Avg. Monthly	Max. Daily	Avg. Monthly	Max. Daily	Frequency	Type
Flow	-	-	-	1.0 MGD	quarterly	daily average
Temperature	(warm water fishery)*			83°F(28.3°C)	quarterly	4 grabs, reporting max., and avg.
	(cold water fishery)*			68°F(20°C)		
pH	(see Part I,A,1,a)				quarterly	4 grabs, reporting range

The discharge shall not cause or contribute to a rise in the temperature of the receiving waters resulting from artificial origin of greater than 4°F(2.2C).

This permit does not allow for the addition of any biocide or chemical for any purpose to the effluent.

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the point of discharge.

The effluent limitations are based on the state water quality standards and are certified by the State.

*The designation of cold or warm water fisheries shall be that provided in the Massachusetts Water Quality Standards, 314 CMR 4.05(4) and 4.05(5), Tables 1 - 27.

Bok G/1.1.3 Adams EXHIBIT "B"
GSC 59

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

April 29, 1985

Mr. David R. Beckerman
Vice President
W.R. Grace & Co.
Polyfibron Division
55 Hayden Avenue
Lexington, MA 02173

Re: General NPDES Permit No: MAG250007
Facility Name: W.R. Grace & Co.
Address: Harmony Street
Adams, MA
Receiving Water: Hoosic River

Dear Mr. Beckerman:

In response to your request of September 24, 1984, enclosed is a copy of the General National Pollutant Discharge Elimination System (NPDES) Permit for the discharge of noncontact cooling water in the State of Massachusetts. Your discharge is covered under this General Permit effective as of the date of this letter. This General Permit is regulated under 40 C.F.R. §122.28, 48 Fed. Reg. 14164-14165 (April 1, 1983).

Please be advised that pursuant to Commonwealth of Massachusetts regulations, 314 CMR 3.03, a permit to discharge non-contact cooling water to surface waters of the Commonwealth is required. Contact the Department of Environmental Quality Engineering, Division of Water Pollution Control, Permit Section, One Winter Street, 7th Floor, Boston, MA 02108, telephone (617) 292-5673 for further information on state permit requirements and application filing procedures.

Your General Permit Number is indicated above and should be referenced on all correspondence. Should you have any questions relative to your coverage under this program, don't hesitate to contact Nanci Siciliano of my staff. She may be reached at 617/223-3940.

Sincerely,

for Edward K. McSweeney, Chief
Compliance Branch

Enclosure

cc: State Water Pollution Control Agency
w/o encl.

bcc: T. O. Gavin
G. W. Siegel
M. Stoler

GRACE

RECEIVED BY
SEP 25 1984
LEGAL DEPARTMENT
CAMBRIDGE, MA

James F. Murphy, Jr.
Assistant Vice President
Polyfibron Division

W. R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

CERTIFIED MAIL

September 24, 1984

Mr. Bernard R. Sacks
Water Quality Branch
Water Management Division
U. S. Environmental Protection Agency
J. F. K. Federal Building
Boston, Massachusetts

Dear Mr. Sacks:

Re: MA0006009 Subject: Notice of Intent
MAG250000

This is to notify you that upon expiration of NPDES permit No. MA0006009 which covers the non-contact cooling water discharge from the W. R. Grace & Co. facility located at Harmony Street, Adams, Massachusetts, that it is Grace's intent to be covered by the conditions of the general NPDES permit (No. MA6250000) published in the June 15, 1984 Federal Register. The Adams permit expires on October 16, 1984.

The Grace discharge at the Adams facility meets the requirements of being covered by the general permit in that:

1) the discharge consists solely of non-contact cooling water and/or uncontaminated stormwater;

2) the flow rate of discharge is always less than one million gallons per day and;

3) the receiving water has a Water Quality Clasification "B" as designated in the Massachusetts Water Quality Standards, 314 CMR 4.00 et seq and;

4) Grace is currently in compliance with all conditions of the permit.

If you have any questions or problems with this Notice of Intent, please contact Gary Siegel or myself at 861-6600.

Sincerely,

James F. Murphy, Jr.

JFM/jb/

cc: Alan T. Michaud
Plant Manager
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

4M-1-71-048519

THE COMMONWEALTH OF MASSACHUSETTS

WATER RESOURCES COMMISSION

DIVISION OF WATER POLLUTION CONTROL
1 DRAPER HALL, UNIVERSITY OF MASSACHUSETTS
AMHERST 01002

WESTERN REGIONAL OFFICE

September 10, 1975

Mr. Albert P. Benelli, Chief
Fire Department
State Street
North Adams, Massachusetts 02147

Re: Adams-Hoosic-ilAZ
W. R. Grace Company

Dear Chief Benelli:

On September 3, 1975 this office was informed by Mr. Girardi, Superintendent of Public Works in North Adams, that you had analyses made of the liquid disposed of by W. R. Grace Company in the city's landfill. Would you please forward a copy of the test results to this office?

Your cooperation and immediate response to the above request would be greatly appreciated.

Very truly yours,

William A. Doubleday, P.E.
Regional Engineer

WAD/RJD/lev

cc: Mayor Bianco
Mr. Girardi
F. H. Bonne

Certified 720218

Adams Bot AA131

James F Murphy, Jr
Assistant Vice President
Polyfibron Division

W. R Grace & Co
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

GRACE

March 15, 1984

Ms. Nancy Wren
Division of Hazardous Waste
The Commonwealth of Massachusetts
Department of Environmental
Quality Engineering
1 Winter Street
Boston, Massachusetts 02108

Dear Ms. Wren:

Enclosed are two (2) signed certifications regarding Grace's withdrawal of interim status for its Adams and Acton plants. The letters formally requesting withdrawal of interim status were sent to the EPA on December 14, 1983 and November 16, 1983, respectively.

If you have any questions, please contact me at the above phone number.

Sincerely,

James F. Murphy, Jr.

JFM,JR/mlr

Enclosures (2)

F/U Adams Hazardous waste

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

bcc: D. R. Beckerman
T. O. Gavin
N. I. Palmer
M. Stoler - Cambridge
R. G. Tower - Adams

December 14, 1983

Ms. Mary C. Sanderson
State Waste Programs Branch
U.S. Environmental Protection Agency
J.F.K. Federal Building (Room 1903)
Boston, Massachusetts 02203

Dear Mary:

RE: MAD 002081615

The W. R. Grace & Co. facility in Adams, Massachusetts has been operating as a hazardous waste storage facility with interim status, having met the requirements of 40 CFR §270.70. Grace has recently reevaluated its need to maintain its interim status. Based on this evaluation, Grace has decided to voluntarily withdraw its Part A application and terminate its interim status. Enclosed is a subsequent notification form reflecting this change.

Grace had originally submitted its Part A application because we were uncertain that regular hazardous waste pick-ups could be arranged on a reliable basis, particularly during the winter months. Since the regulations became effective three years ago, Grace has determined that our concerns were no longer warranted. On this basis, Grace will continue to be a generator of hazardous waste and will comply with all Massachusetts generator regulations as specified in 310 CMR 30.300.

On December 16, 1983, all remaining hazardous waste that was being stored on-site was shipped off-site for disposal by Recycling Industries, Inc. All hazardous waste generated by the plant after the above date will be subject to the 90-day accumulation regulations as specified in 310 CMR 30.340. If you have any questions concerning our change of hazardous waste activity, please contact me at the above number.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr

cc: Linda Benevides - DEQE, Boston
A. T. Michaud - Grace, Adams

Please print or type with ELITE type (12 characters/inch) in the unshaded areas only.

Form Approved OMB No. 158-S79015
GSA No. 0246-EPA-OT

EPA — NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	PLEASE PLACE LABEL IN THIS SPACE
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	
III. LOCATION OF INSTALLATION	

INSTRUCTIONS: If you received a preprin label, affix it in the space at left. If any of information on the label is incorrect, draw a through it and supply the correct informat in the appropriate section below. If the labe complete and correct, leave Items I, II, and below blank. If you did not receive a preprin label, complete all items. "Installation" mean single site where hazardous waste is generat treated, stored and/or disposed of, or a tra porter's principal place of business. Please re to the INSTRUCTIONS FOR FILING NOTI CATION before completing this form. T information requested herein is required by l *(Section 3010 of the Resource Conservation a Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F | T/A: 1 | APPROVED | DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION

W. R. GRACE & CO., POLYFIBRON DIVISION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 HARMONY STREET

CITY OR TOWN	ST.	ZIP CODE
4 ADAMS	MA	01220

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 HARMONY STREET

CITY OR TOWN	ST.	ZIP CODE
6 ADAMS	MA	01220

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 ALLAN T. MICHAUD, PLANT MANAGER	413.743.0546

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 W. R. GRACE & CO.

B. TYPE OF OWNERSHIP (enter the appropriate letter into box): M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.: MAD002081651

IX. DESCRIPTION OF HAZARDOUS WASTES

C E R T I F I C A T I O N

I, James F. Murphy, Jr., Assistant Vice President, hereby

(name) (position)

certify that W. R. Grace & Co. (Adams, Massachusetts), MAD002081651, which

(name of company) (EPA I.D. #)

notified the U.S. Environmental Protection Agency ("EPA") that it treats, stores and/or disposes of hazardous waste, at all times from this date forward (1) will not accumulate any hazardous waste for more than 90 days; (2) will accumulate hazardous waste in compliance with 310 CMR 30.340; (3) will not store, treat, or dispose of hazardous waste; and (4) will comply with all other applicable requirements of 310 CMR 30.000.

I understand that the Department of Environmental Quality Engineering is deferring applicability of the financial responsibility requirements of 310 CMR 30.900 as a result of W. R. Grace & Co. having submitted

(name of company)

a request for change of status and this certification, so long as

W. R. Grace & Co. abides by the terms of this certification.

(name of company)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including possible fines and imprisonment.

James F. Murphy, Jr.

(Signature)

James F. Murphy, Jr.

Tower

F

ADAMS

TO: L. E. Roy ✓

DATE: March 21, 1982

FROM: R. G. Tower

SUBJECT: CECOS/CER

CC: E. T. Murphy

It is my considered opinion that of the 26 drums of hazardous waste returned to us from CECOS/CER, 15 drums unquestionably fit the criteria for landfilling in Ohio. This criteria, as you well know, is that the material has to be of a honey-like consistency, or thicker, according to George Woods (CECOS sales rep.).

I also feel that 2 other drums could easily have been treated at CECOS/CER in Ohio by simply topping them off with dirt or an absorbant. One of these 2 drums had an approximate 2" layer of solvent atop a high viscosity rubber solution. The other had an undetermined, but obviously minimal amount of free water within the voids of some cross-linked latex.

The remaining 9 drums indeed did not fit the criteria for landfilling in Ohio or, in fact anywhere else! The problems in this case were two-fold. First, we made some invalid assumptions on the ultimate state of our non-hazardous waste latex. Secondly, we based our labeling on erroneous data involving 3 drums. This last problem is one of human error, the potential of which will obviously always exist to some degree.

Russell G. Tower

R. G. Tower

RGT:sml

Tower

F

ADAMS

TO: L. E. Roy

DATE: April 5, 1982

FROM: R. G. Tower

SUBJECT: 4/1/82 Conversation w/Jim Murphy

CC:

On 4/1/82 I had a phone conversation with Jim Murphy concerning several pertinent issues. The following represents some of the gleanings from this discussion.

Contrary to my ill-at-ease feelings about the shipping of our "empties," Jim said not to worry. He claimed that the nature of the residues in the empty drums we generate does not necessitate the more stringent requirements (ie. labeling, manifesting and shipping only to licensed TSD facilities) that I had heard about.

Confirmation was obtained on the fact that flammable liquids, such as spent solvents, are to be shipped in close-head containers. I asked for a copy of the legistration dictating this requirement for our records.

Jim said he didn't know whether or not the retainer rings on drums of hazardous waste had to be secured with a 5/8" bolt. He'll look into this.

Russell G. Tower

R. G. Tower

RGT:sml

Tower CR

GRACE

Polyfibron Division

Industrial Chemicals Group
W.R. Grace & Co.
Harmony Street
Adams, Mass. 01220

(413) 743-0546

November 4, 1982

Commonwealth of Massachusetts
Dept. of Environmental Quality Engineering
Division of Hazardous Waste
1 Winter Street
Boston, MA. 02108

Attn: Anne Rappaport

Dear Ms. Rappaport:

Enclosed you will find a copy of New England Manifest # MA0049277. This document accompanied a shipment of 74 drums of hazardous waste and 2 drums of non-hazardous waste which left our facility today. The destination of the shipment is "American Recovery" in Baltimore, MD. The expected mode of treatment is incineration.

If you have any questions, please call me at (413) 743-0546.

Sincerely,

W. R. GRACE & CO.

Russell G. Tower

Russell G. Tower
Environmental Affairs

RGT:sml
Enclosure

~~(1) CAE-FMT~~

(2) SMC - F

November 17, 1980

Adams EPA Forms Mailed to:

EPA - Region 1
Permits Branch
P. O. Box 8748
Boston, Massachusetts 02114

bcc: O. M. Favorito - Cambridge
T. O. Gavin - Lexington
E. T. Murphy - Adams

REC'D NOV 20 1980

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER: F MAD002081651

LABEL ITEMS

I. EPA I.D. NUMBER

MAD002081651

II. FACILITY NAME

GRACE W R & CO INC

V. FACILITY MAILING ADDRESS

HARMONY ST
ADAMS MA 01220

VI. FACILITY LOCATION

HARMONY ST
ADAMS MA 01220

GENERAL INSTRUCTIONS

If a preprinted label has been provided, aff it in the designated space. Review the inform ation carefully; if any of it is incorrect, cro through it and enter the correct data in th appropriate fill-in area below. Also, if any i the preprinted data is absent *(the area to th left of the label space lists the information that should appear)*, please provide it in th proper fill-in area(s) below. If the label complete and correct, you need not comple Items I, III, V, and VI *(except VI-B whic must be completed regardless)*. Complete a Items if no label has been provided. Refer t the instructions for detailed item descri tions and for the legal authorizations und which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACH
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: W. R. GRACE & CO.

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 MURPHY, EDWARD T. PLANT MANAGER	413 743 0546

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 HARMONY STREET

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 ADAMS	MA	01220

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 HARMONY STREET

B. COUNTY NAME: BERKSHIRE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
6 ADAMS	MA	01220	

CONTINUED FROM THE FRONT

II. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
2641 (specify) PAPER COATING & GLAZING	(specify) N.A.
C. THIRD	**D. FOURTH**
(specify) N.A.	(specify) N.A.

III. OPERATOR INFORMATION

A. NAME

W. R. GRACE & CO.

B. Is the name listed in Item VIII-A also the owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)

F = FEDERAL; M = PUBLIC (other than federal or state); S = STATE; O = OTHER (specify); P = PRIVATE

P (specify)

D. PHONE (area code & no.) A 413 743 0546

E. STREET OR P.O. BOX

HARMONY STREET

F. CITY OR TOWN

ADAMS

G. STATE MA

H. ZIP CODE 01220

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
N MA0006009	9P N.A.
B. UIC (Underground Injection of Fluids)	**E. OTHER** (specify)
U N.A.	9 N.A. (specify)
C. RCRA (Hazardous Wastes)	**E. OTHER** (specify)
N.A.	9 N.A. (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

The manufacture of paper and textile printing blankets. This involves the coating of paper and textiles with solvent based, rubber coatings. Also includes grinding the surface of the blankets and cutting them to finished product size.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE
Robert W. Samuels, Vice President		

COMMENTS FOR OFFICIAL USE ONLY

(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S[illegible]003

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER: F M A D 0 0 2 0 8 1 6 5 1 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C	YR.	MO.	DAY
8	7 3	0 6	0 1

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR.	MO.	DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

N.A.

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES — CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.

1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C DUP 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G	
X-2	T 0 3	20	E	
1	S 0 1	11,000	G	
2				
3				
4				

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
5				
6				
7				
8				
9				
10				

inued from the front.

PROCESSES *(continued)*

PACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE ICLUDE DESIGN CAPACITY.

DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste*(s)* that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	D 0 0 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S30004

EPA I.D. NUMBER (enter from page 1)	FOR OFFICIAL USE ONLY
WMAD002081651	WI DUP DUP

DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F005	160,000	P	S01	
2	U220	100	P	S01	
3	U107	100	P	S01	
4	U154	100	P	S01	
5	U159	100	P	S01	
6	U226	100	P	S01	
7	D001				Included with above
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

tinued from the front.

DESCRIPTION OF HAZARDOUS WASTES (continued)

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

												T/A	C
M	A	D	0	0	2	0	8	1	6	5	1		6

. FACILITY DRAWING

ll existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

I. PHOTOGRAPHS

... existing facilities must include photographs (aerial or ground–level) that clearly delineate all existing structures; existing storage, ...ment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

...ACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)	LONGITUDE (degrees, minutes, & seconds)
42° 37' 03"	73° 07' 28"

...III. FACILITY OWNER

[X] A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
	G		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Robert W. Samuels	[signature]	11-14-80

X. OPERATOR CERTIFICATION

... penalty of law that I have personally examined and am familiar with the information ... and that based on my inquiry of those individuals ... true, accurate, and complete. I am aware that there are significant penalties ... possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

GRACE

cc: J F Murphy Jr

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

bcc: D. R. Beckerman
T. O. Gavin
N. I. Palmer
M. Stoler - Cambridge
R. G. Tower - Adams

December 14, 1983

Ms. Mary C. Sanderson
State Waste Programs Branch
U.S. Environmental Protection Agency
J.F.K. Federal Building (Room 1903)
Boston, Massachusetts 02203

Dear Mary:

RE: MAD 002081615

The W. R. Grace & Co. facility in Adams, Massachusetts has been operating as a hazardous waste storage facility with interim status, having met the requirements of 40 CFR §270.70. Grace has recently reevaluated its need to maintain its interim status. Based on this evaluation, Grace has decided to voluntarily withdraw its Part A application and terminate its interim status. Enclosed is a subsequent notification form reflecting this change.

Grace had originally submitted its Part A application because we were uncertain that regular hazardous waste pick-ups could be arranged on a reliable basis, particularly during the winter months. Since the regulations became effective three years ago, Grace has determined that our concerns were no longer warranted. On this basis, Grace will continue to be a generator of hazardous waste and will comply with all Massachusetts generator regulations as specified in 310 CMR 30.300.

On December 16, 1983, all remaining hazardous waste that was being stored on-site was shipped off-site for disposal by Recycling Industries, Inc. All hazardous waste generated by the plant after the above date will be subject to the 90-day accumulation regulations as specified in 310 CMR 30.340. If you have any questions concerning our change of hazardous waste activity, please contact me at the above number.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr

cc: Linda Benevides - DEQE, Boston
A. T. Michaud - Grace, Adams
Joan Thomas - DEQE, Springfield

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-QT

EPA — U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	PLEASE PLACE LABEL IN THIS SPACE
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	
III. LOCATION OF INSTALLATION	

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F | T/A: | C: 1 | APPROVED | DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION

W. R. GRACE & CO., POLYFIBRON DIVISION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 HARMONY STREET

CITY OR TOWN: 4 ADAMS | ST.: MA | ZIP CODE: 01220

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 HARMONY STREET

CITY OR TOWN: 6 ADAMS | ST.: MA | ZIP CODE: 01220

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 ALLAN T MICHAUD PLANT MANAGER | PHONE NO. *(area code & no.)*: 413-743-0546

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 W. R. GRACE & CO.

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: MAD002081651

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

I.D. – FOR OFFICIAL USE ONLY

W

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F005	M001				
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001)	[ ] 2. CORROSIVE (D002)	[ ] 3. REACTIVE (D003)	[ ] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
James F. Murphy Jr	James F. Murphy, Jr. Assistant Vice President	12/14/83

CONFIDENTIAL LEGAL MEMORANDUM
(Attorney's Work Product)

TO: A. Nagy/Adams
T. Phair/Canton
R. Olson/Canton

cc: M. Stoler
S. Hynes
D. Kronenberg

FROM: M. Seeler

RE: EPA Information Requests

DATE: December 16, 1988

As Mark Stoler may have explained to you, several Grace facilities in Massachusetts have received information requests from EPA pertaining to RCRA corrective action. In order to coordinate the response to these requests I will need copies of the following:

1. Part A - Hazardous Waste Permit Application (submitted in 1980) for your facility.

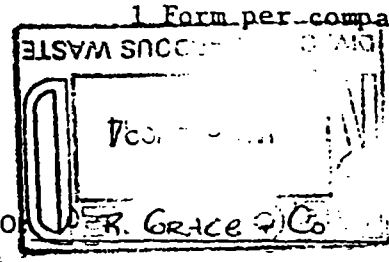
2. Any correspondence sent to EPA and/or the Commonwealth of Massachusetts withdrawing the application or notifying the US or the state of a change of status.

3. Any correspondence received from EPA and/or the Commonwealth of Massachusetts acknowledging the receipt of the prior correspondence and/or acknowledging the change of status.

I would appreciate your prompt attention to this matter.

Marcia Seeler

1 Form per company



MEMORANDUM - CHANGE OF STATUS REQUEST

TO: Nancy Wrenn
DEQE - DHW
1 Winter Street
Boston 02108

FROM: Joan Thomas

REGION: Western

DATE: 1/19/84

NAME OF CO W.R. Grace & Co

MAD# MAD002081651

CURRENT STATUS Gen, TSD

CHANGE REQUESTED Gen only

PROCESS CODES, if TSDF S01

DATE OF INSPECTION 11-21-83

FURTHER ACTION NEEDED no

CHANGE APPROVED yes

Description of Current Status, changes in processes, listing each code:

W.R Grace originally filed for a TSDF to cover any storage greater than ninety days. They have now decided to abide by a 90 day storage limit and thus eliminate the need for a TSDF status. The regional office approves this change.

cc: Community official _____

Region 1
TSD → G

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

December 14, 1983

Ms. Mary C. Sanderson
State Waste Programs Branch
U.S. Environmental Protection Agency
J.F.K. Federal Building (Room 1903)
Boston, Massachusetts 02203

Dear Mary:

RE: MAD 002081~~615~~651

The W. R. Grace & Co. facility in Adams, Massachusetts has been operating as a hazardous waste storage facility with interim status, having met the requirements of 40 CFR §270.70. Grace has recently reevaluated its need to maintain its interim status. Based on this evaluation, Grace has decided to voluntarily withdraw its Part A application and terminate its interim status. Enclosed is a subsequent notification form reflecting this change.

Grace had originally submitted its Part A application because we were uncertain that regular hazardous waste pick-ups could be arranged on a reliable basis, particularly during the winter months. Since the regulations became effective three years ago, Grace has determined that our concerns were no longer warranted. On this basis, Grace will continue to be a generator of hazardous waste and will comply with all Massachusetts generator regulations as specified in 310 CMR 30.300.

On December 16, 1983, all remaining hazardous waste that was being stored on-site was shipped off-site for disposal by Recycling Industries, Inc. All hazardous waste generated by the plant after the above date will be subject to the 90-day accumulation regulations as specified in 310 CMR 30.340. If you have any questions concerning our change of hazardous waste activity, please contact me at the above number.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr

cc: Linda Benevides - DEQE, Boston
A. T. Michaud - Grace, Adams
Joan Thomas - DEQE, Springfield

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	PLEASE PLACE LABEL IN THIS SPACE
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	
III. LOCATION OF INSTALLATION	

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act)*.

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER	APPROVED	DATE RECEIVED (yr., mo., & day)
F		

I. NAME OF INSTALLATION

W. R. GRACE & CO., POLYFIBRON DIVISION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 HARMONY STREET

CITY OR TOWN	ST.	ZIP CODE
4 ADAMS	MA	01220

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 HARMONY STREET

CITY OR TOWN	ST.	ZIP CODE
6 ADAMS	MA	01220

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*	PHONE NO. *(area code & no.)*
2 ALLAN T. MICHAUD, PLANT MANAGER	413-743-0546

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 W. R. GRACE & CO.

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: M

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: MAD002081651

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

[redacted]mes F. Murphy, Jr.
ssistant Vice President
Polyfibron Division

GRACE

W. R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

December 3, 1982

Mr. Alan Weinberg
Mr. Richard M. Driscoll
Department of Environmental
Quality Engineering
Division of Hazardous Waste
1414 State Street
Springfield, Massachusetts 01109

Dear Messrs. Weinberg and Driscoll:

This report is in response to our meeting in Springfield on November 3, 1982 in connection with a #6 fuel oil tank leak in the W. R. Grace & Co. plant in Adams, Massachusetts.

I think we have covered, in detail, all of the items we discussed at that meeting in the following report which is outlined under "Executive Summary".

Executive Summary

1. Around the first of October, 1982, a small amount of oil seeped through the boiler room wall which is adjacent to one of the buried fuel oil tanks (see drawings, Figures 1 and 2).

2. The plant contacted the DEQE in Springfield and, on the basis of preliminary inventory check and incorrect assumptions, estimated that 600 gallons of oil had been lost.

3. The oil tank (tank #1) was emptied, cleaned, inspected and air tested. A very small area of corrosion was detected about in the center of the head of the tank next to the boiler room. The air test indicated that the hole must be very small.

4. A closer look at inventory records, the viscosity of the oil, the size of the hole, and a better knowledge of the inability of #6 fuel oil to move in the ground, lead us to the conclusion that very little oil was lost -- probably less than 10 or 15 gallons.

5. The water from a nearby dug well (80 feet) was analyzed for oil and grease, both before and after pumping for 5 hours. Both samples were negative.

6. We feel that the oil tank (tank #1) should be repaired and put back into service. The repairs should be similar to the 4" Gunite lining installed in tank #2 in 1972 which successfully repaired the leak in that tank.

L. L. BROWN PAPER COMPANY, a Massachusetts corporation with principal place of business at Adams, Berkshire County, Massachusetts, for consideration paid, grants to DEWEY AND ALMY CHEMICAL COMPANY, a Massachusetts corporation with principal place of business at Cambridge, Middlesex County, Massachusetts, with WARRANTY COVENANTS the land situate in said Adams in Berkshire County, Massachusetts, with the buildings thereon excepting the building on the second parcel hereinafter referred to:

A. FIRST PARCEL: That parcel of unregistered land, bounded and described as follows:

Beginning at an iron pin in the concrete wall in the southeasterly line of the Pittsfield & North Adams R.R. Corp, land, distant 455.36 feet northeasterly from a stone monument situate in the northeasterly line of Harmony Street, and marking also the northerly corner of the Second Parcel, as well as a northerly corner of land of this Seller registered by the Massachusetts Land Court as Parcel No 8; thence north 55° 41' 30" east 781.15 feet to a point on the west bank of the Hoosac River; thence southerly and southwesterly approximately along the bank of said river, on a westerly and northwesterly line of said Parcel No. 8, 873.52 feet by various courses, to a stone bound marking the southerly corner of the parcel; thence north 34° 18' 30" west 255.09 feet along the northeasterly line of aforesaid Parcel No. 8 so registered by said Land Court (this is also the northeasterly line of the Second Parcel) to the point of beginning.

Aforesaid parcel is shown as Parcel #1 upon a plan entitled, "Plan of Lands in Adams, Massachusetts, To Be Sold By The L. L. Brown Paper Company to Dewey and Almy Chemical Company", which plan is dated December 12, 1944, and is drawn by Henry C. Neff, Civil Engineer, and is on file at the Northern Berkshire Registry of Deeds at Adams aforesaid.

The City of

NORTH ADAMS

Massachusetts

ALBERT P. DENELLI
FIRE CHIEF

September 12, 1975

William A. Doubleday, P.E.
The Commonwealth of Massachusetts
Water Resources Commission
1 Draper Hall
University of Massachusetts
Amherst, Massachusetts

Dear Mr. Doubleday:

I received your letter dated September 10, 1975. In regards to this letter, I did not have an analysis made of the liquid dumped at the city landfill area. However, we did call Chemtrec at 12:55 P.M. on 8/23/75, a national 24 hour service on chemicals. This was to determine if there was a fire or an explosive hazard. We talked to a Mr. Chazen and he informed us that there was no potential fire-explosion hazard at the city landfill area, as the liquid was dumped into the ground.

Our inquiry was made only to determine the public safety factor involved, with the chemical in it's present state, that is after it has been disposed into the ground.

On 9/4/75, we read a news article that stated that another chemical, propylenetrichloride might have also been dumped at the landfill area. At 2:40 P.M. the same day, we again called Chemtrec and talked to a Mr. Wallace. He could not find this chemical listed, but did find propylenedichloride and said that this chemical did not give any immenent danger to a fire or explosive hazard in the landfill area where the liquid was dumped. Also, he stated that the W. R. Grace Company was listed there and that he could not find these chemicals listed for said company.

Both chemicals were supposedly dumped the same day. If any other chemicals were involved, this department was not made aware of it.

This information was again requested only for the concern of the public safety in the city landfill area.

Respectfully yours,

Albert P. Denelli
Fire Chief

APD/csp

City of

COMMISSIONER OF PUPLIC WORKS
JOSEPH J. GIRARDI

NORTH ADAMS
MASSACHUSETTS

July 31, 1975

RECEIVED
AUG 1 1975
GRACE — ADAMS

Mr. Lionel Roy
W. R. Grace Company
Harmony Street
Adams, Massachusetts 01220

Dear Mr. Roy:

I have presented your question on the disposal of your containers to the Board of Health. The answer I received was verbal and very vague.

I was informed by Mr. Heisler that it was favorable to dispose of the liquid containers but not the solid waste.

It was his contention that underground fires would be fed by this by-product and would be dangerous.

I was also informed by Mr. Heisler that I could have the authority to make a suitable location to receive the barrels of waste and liquid and dispose of them as I see fit.

This letter is to inform you that I will accept the barrels that contain liquid and those that have rubbish, but you will have to dispose of the solid type elsewhere.

I must insist that you call this office one day before you dispose of the above items so that I can make the necessary arrangements for disposal at our Landfill Area.

Yours truly,

Joseph J. Girardi

Joseph J. Girardi
COMMISSIONER OF PUBLIC WORKS

JJG/r

Arrangement made to have it land at the land fill Aug 11 AM on Thursday Aug 7th

SEP 9 1975

ADAMS MATERIAL SAFETY DATA SHEET REQUEST LETTER

October 22, 1984

Company	Product Name
Uniroyal Chemical Co. Spencer Street Naugatuck, CT 06770	Aminox
Holcomb Manufacturing Co. P.O. Box 2400 Dayton, NJ 08810	Aerosol DSX
Dow Corning Corp. Customer Service Dept. P.O. Box I-M Midland, MI 48640	Catalyst 23A SYL-OFF 23
Astro Chemicals Inc. 70 Shaws Lane Springfield, MA 01101	Electric Motor Bath
IMS Co. 10373 Stafford Road Chagrin Falls, OH 44022	Silicone Mold Release
Magnaflux Corp. 7300 West Lawrence Street Chicago, IL 60656	Spot Check Cleaner
DuBois Chemicals DuBois Tower Cincinnati, Ohio 45202	Cottaway (sewer aid)
Certified Laboratory Inc. P.O. Box 2493 Fort Worth, TX 76101	NM Gel
Bowman Distribution Barnes Group Inc. 850 East 72nd Street Cleveland, OH 44103	Battery Terminal Coating

American Cyanamid Industrial Chemical Division One Cyanamid Plaza Wayne, NJ 07470	Cymel 303
R. T. Vanderbilt & Co. 30 Winfield Street Norwalk, CT 06855	Vanax A Altax
Commercial Chemicals Division 3M Company 3M Center, Bldg. 223-6SE St. Paul, MN 55144	Scotchgard Fabric Protector FC-208
Oliver Chemical Co., Inc. 2908 Spring Grove Avenue Cincinnati, OH 45225	Cell Soak 146 Compound Cell Soak 380 NF
Graymills Corp. 3705 North Lincoln Avenue Chicago, IL 60613	Agiteen Parts Cleaner

jb/ll

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

Uniroyal Chemical Co.
Spencer Street
Naugatuck, Connecticut 06770

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) became effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Aminox

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

Since Grace must compile books of the MSDSs used by the plant and incorporate them as part of our employee training, we would appreciate a response as soon as possible.

If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

Holcomb Manufacturing Co.
P. O. Box 2400
Dayton, New Jersey 08810

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Aerosol DSX

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

Dow Corning Corp.
Customer Service Dept.
P. O. Box I-M
Midland, Michigan 48640

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) became effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Catalyst 23A
SYL-OFF 23

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

Astro Chemicals Inc.
70 Shaws Lane
Springfield, Massachusetts 01101

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Electric Motor Bath

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

IMS Co.
10373 Stafford Road
Chagrin Falls, Ohio 44022

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) became effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Silicone Mold Release

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

Magnaflux Corp.
7300 West Lawrence Street
Chicago, Illinois 60656

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) became effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Spot Check Cleaner

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

DuBois Chemicals
DuBois Tower
Cincinnati, Ohio 45202

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Cottaway (sewer aid)

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

Certified Laboratory Inc.,
P. O. Box 2493
Fort Worth, Texas 76101

To Whom It May Concern:

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NM Gel

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

Bowman Distribution
Barnes Group Inc.
850 East 72nd Street
Cleveland, Ohio 44103

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Battery Terminal Coating

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

American Cyanamid
Industrial Chemical Division
One Cyanamid Plaza
Wayne, New Jersey 07470

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Cymel 303

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

R. T. Vanderbilt & Co.
30 Winfield Street
Norwalk, Connecticut 06855

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Vanax A
Altax

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

Thank you for being so responsive to my previous requests

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

Commercial Chemicals Division
3M Company
3M Center, Building 223-6SE
St. Paul, Minnesota 55144

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Scotchgard Fabric Protector FC-208

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Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

Oliver Chemical Co., Inc.,
2908 Spring Grove Avenue
Cincinnati, Ohio 45225

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Cell Soak 146 Compound
Cell Soak 380 NF

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Sincerely,

Gary W. Siegel

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

October 22, 1984

Graymills Corp.
3705 North Lincoln Avenue
Chicago, Illinois 60613

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) became effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Agiteen Parts Cleaner

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

Since Grace must compile books of the MSDSs used by the plant and incorporate them as part of our employee training, we would appreciate a response as soon as possible.

If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

IMPORTANT MSDS TERMS

TLV - Threshold Limit Value

LD_{50} - Dose at which 50% of exposed organisms died

ppm - parts per million

mg/m^3 - milligrams per cubic meter of air

CARCINOGEN - Compound capable of producing a cancer

MUTAGEN - Any substance that causes changes in the genetic structure of future generations

TERATOGEN - Any substance that causes developmental malformations not inherited to a fetus

NEUROTOXIC - Toxic to the nerves or nervous tissue which causes disorders due to altered neural relations

GWS/jb/#10
10/10/84

G.W. Siegel
September 25, 1984

CONFIDENTIAL

ADAMS COMPOUND HAZARDOUS CONSTITUENTS

LH1CG-2

DYOR
PAXOT (80 PC) "C"

TSOL-1

HIDOP
GOWNU
REHE

LHAH74SL

PHOR "C"
BEVTE
AMM

MESZ-SL

MEK

PBCD617

KAD
OXRD

LH46/4 SL

TOL
TNOB
NRO

LH65/14 SL

TOL
NRO

LH 181-7 SL

TOL
NRO

LH47/2 SL

TOL
TNOB

LH 66/1 SL

TOL
NRO

PE 2SL

TOL

1208SL-R

TOL
TNOB

LH 22/3

TOL

LH 1MCD2

OFCX "C"
PAXOT "C"

OFPAM 22 SL 20

ONE
MEK

WRAC

POLCD

LH ACT 8A

WADY
NRO

310 SL/11

TOL
NRO

LH27/3 SL-30

TOL
NRO

LPAH11SL 3

DPNSO
PIPA

S/F27-3SL

TOL
NRO

LH20/4 SL

TOL
TNOB

NP31 SL/2

TOL
FIGGU "C"
UGLI
METH
ONE
TRSB "C"

LPS2A CT NL

FISS "C"
YELOX
OXRD
VDSL
KDX-BS

ADAMS COMPOUND HAZARDOUS CONSTITUENTS

LHAH1SL

TOL
UGLI

LHAH 16/6 SL

TOL
FIGGU "C"
TNOB
UGLI
ONE
TRSB "C"

LP18 SL/3

TOL
FIGGU "C"
UGLI
METH

INTLK 50 SL

TOL
NRO
INTLK

INTLK 65 SL

TOL
NRO
INTLK

LH27/3 SL

TOL
NRO

D11ASL

MAB1C
METH
KEVYT
MYYNX

ADAMS COMPOUND HAZARDOUS CONSTITUENTS

INTLK-175 SL

TOL
NRO
EMCZA
INTLK

214 SL 30

TOL
MEK
MCL
PBIAS
NRO

NEAC-SL

TOL
BEDYE
ARMNU "C"

FIPA-25-SL

IPA

GINSB-SL

ONE

LHSPLICE

None

NOST(2)SL

FISS "C"

NABB (9T) MBSL

TOL
MM-NATT

PAC(X)SL

MCL

PBCD 6 (34)

None

ADAMS COMPOUND HAZARDOUS CONSTITUENTS

PBEB — Shipped

NIZET 50%
P33

PBPA — Shipped

None Hazardous

ZS-SL-2

ZS
ONE

156 SL/2

TOL
NRO

175 SL/5

TOL
NRO

307/2 SLX

TOL
NRO

310 SL-33/4

TOL
NRO

600 SL

TOL
NRO

602SL

TOL

CUSH(8)MB SL

TOL

LH46/3 SL-25

TOL
NRO

LH 47 SL/EX

TOL

MCEL 5 SL

None

NABB (11T)MBSL

TOZ
MM-NATTSL

NIZET SL 20/2

NIZET
MEK
ONE

PF-LCP-D5

HOOK
DCIX
ZS
COLIM
GOWNU
AGST

PF-LCP-1.0X

HOOK
DCIX
PIND
ZS
COLIM
GOWNU
AGST

PF-8F-70 (75/25) BLK

HOOK
DCIX
ZS
COLIM
GOWNU
AGST

PLACD (11) H3 SL

TOL
NRO
FIPLN

PLOR (7) SL

TOL
NRO
FIPLN

TRSB/ONE-10 SL

ONE
TRSB "C"

TRSB-YNB

ONE
TRSB "C"

TC-1

OFCX "C"

TC-2

None

TC-3

AMM

TC-3D

ONE
MEK

"C" - greater than 1 part per million suspected carcinogen present.

GWS/jb/14

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

September 17, 1984

Regional Right-To-Know Coordinator
Western Region
Department of Environmental Quality Engineering
436 Dwight Street - 4th Floor
Springfield, Massachusetts 01103

Dear Sir:

Please find enclosed the employer identification sheet and the material safety data sheets for all of the hazardous substances used at our Adams facility in accordance with CMR 3304.

You may address any questions to myself, at the above address and phone number, or Stephen Hatfield at (413) 743-0546.

Sincerely,

Gary W. Siegel

GWS/jb
enclosures (2)

Gary W. Siegel
Environmental Engineer

cc: Stephen Hatfield - Adams

EMPLOYER IDENTIFICATION SHEET

Employer's Name:	W. R. Grace & Co. Polyfibron Division
Workplace Address:	Harmony Street Adams, Massachusetts 01220
Mailing Address:	Same as above
SIC No.:	2641, 2295
Employer Contact:	Stephen C. Hatfield Personnel Manager
Plant Telephone No.:	(413) 743-0546
Estimated Number of Employees:	140

G. W. Siegel
September 13, 1984

ADAMS MATERIAL SAFETY DATA SHEET REQUEST LIST

LIST #2

Company Name and Address	Product Name (s)
The Berkshire Gas Co. Berk Gas Division 115 Cheshire Rd. Pittsfield, MA 01201	Liquid Propane
Mechanics Choice 1800 West Indiana Ave. Philadelphia, PA 19132	#78000 Cleaning Material Mix 40-1 Super Greasegone NB
Never-Seez Compound Corp. 2910 S. 18th Ave. Broadview, IL 60153	Never-Seez
General Electric Company Silicon Products Division Waterford, NY 12188	Silicone 1200 Sealant
Edward L. Carter, Inc. P.O. Box 80009 Springfield, MA 01138-0009	Elco Pine Oil Disinfectant White Noxon Metal Polish
Occidental Chemical Corp. PVC Resins Division Armand Hammer Blvd. Pottstown, PA 19464	Polyvinylidene Chloride
Industrial Supply-Sprayon Products Div. The Sherwin-Williams Co. 26300 Fargo Ave. Bedford Heights, OH 44146	Open Chain Light Lube Oil 203 Penetrating Oil
Walter Kidde Div. of Kidde Inc. Bellville, NJ 07109	Carbon Dioxide

GWS/jb/15

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

September 13, 1984

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

Since Grace must compile books of the MSDSs used by the plant and incorporate them as part of our employee training, we would appreciate a response as soon as possible, but no later than September 24, 1984.

If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/16

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

G.W. Siegel
September 13, 1984

CONFIDENTIAL

ADAMS COMPOUND HAZARDOUS CONSTITUENTS

LH1CG-2

DYOR
PAXOT (80 PC) "C"

TSOL-1

HIDOP
GOWNU

LH74 SL

PHOR "C"
BEVTE
AMM

MESZ-SL

MEK

PBCD 6/6

KAD
OXRD
TOL
TNOB

LH46/4 SL

TOL
TNOB
NRO

LH65/14 SL

TOL
NRO

LH 181-7 SL

TOL
NRO

ADAMS COMPOUND HAZARDOUS CONSTITUENTS

LH47/2 SL

TOL
TNOB

GUNK 6 SL

TOL
INTLK
TNOB
TAMT

LH 66/1 SL

TOL
NRO

PF 2 SL

TOL

1208 SL IR

TOL
TNOB

LH 22/3

TOL

LH 1MCD2

OFCX "C"
PAXOT "C"

OFPAM 22 SL 20

ONE
MEK

WRAC

POLCD

ADAMS COMPOUND HAZARDOUS CONSTITUENTS

310 SL/11

TOL
NRO

LH27/3 SL-30

TOL
NRO

LPAH11SL 3

DPNSO
PIPA

S/F27-3SL

TOL
NRO

LH20/4 SL

TOL
TNOB

NP31 SL/2

TOL
FIGGU "C"
UGLI
METH
ONE
TRSB "C"

LPS2A CT NL

FISS "C"
YELOX
OXRD
DANA
UDSL
KDX-BS

ADAMS COMPOUND HAZARDOUS CONSTITUENTS

LHAH 16/6 SL

TOZ
FIGGU "C"
TNOB
UGLI
ONE
TRSB "C"

LP18 SL/3

TOL
FIGGU "C"
UGLI
METH

INTLK 50 SL

TOL
NRO
INTLK

INTLK 65 SL

TOL
NRO
INTLK

LH27/3 SL

TOL
NRO

LH47/2 SL

TOL
TNOB

NYAD 3 SL-1

TOL
TNOB
TAMT

ADAMS COMPOUND HAZARDOUS CONSTITUENTS

LH ACT 8A

WADY
NRO
FIGGU "C"
TOL
TNOB
UGLI
ONE
TRSB "C"

MEFT 175SL

TOL
NRO
EMCZA

DA11ASL

MAB1C
METH
MYYNX

INTLK-175 SL

TOL
NRO
EMCZA
INTLK

214 SL 30

TOL
MEK
MCL
PBTAS
NRO

NEAL-SL

TOL
BEDYE
ARMNU "C"

"C" - greater than 1 part per million suspected carcinogen present.

GWS/jb/14

G. W. Siegel
September 11, 1984

MASSACHUSETTS RIGHT-TO-KNOW TRAINING OUTLINE

The following program was developed to comply with the employee training requirements specified in the Massachusetts Department of Labor Right-to-Know regulations, 441 CMR 21.07.

I. Introduction

Explain that the Massachusetts Right-to-Know law goes into effect in September and this training session is a requirement of the law. Also, there will be new signs posted around the plant within the next few weeks, and we want everyone informed as to why the signs are there and how to interpret them.

Introduce the Plant Coordinator and myself and briefly describe our roles.

Training will include a brief description of what types of hazards exist, how to find out these hazards and what rights each employee has under the law. Please hold specific questions until after the session. The Plant Coordinator will be available any time after the meeting to also answer questions.

II. To Your Health: Hazardous Materials in the Workplace

Show audiovisual program to workers as a way to properly introduce hazardous substances and how hazards can be reduced. Provides a good lead into label and MSDS instruction. If tape not available use outline of program (attached) in place of prepared program.

III. Labels

The purpose is to convey basic information on what the product is and what hazards it presents. Labels will be on the containers or drums used in the plant or posted in the areas where the chemicals are stored or used.

Show examples of some of the labels ordered. Some give more information than others and in different formats. As a way to convey basic hazard information quickly to employees, fire fighters, contractors, etc., the NFPA (National Fire Protection Association) labeling system will be used for those substances which are listed by the NFPA.

Show sample NFPA diamond. Show what each portion represents and what the numbers mean -- 0 (no hazard) to 4 (extreme hazard).

Obviously, labels do not convey all of the information about a product. If more detailed information is needed, then the Material Safety Data Sheet (MSDS) should be consulted.

IV. Material Safety Data Sheet (MSDS)

Explain briefly that an MSDS provides in-depth information on a product and is developed by the supplier. Grace has reviewed them and has requested revised versions where we feel the one we have is inadequate.

To get you familiar with what an MSDS is, we will go through each part of the MSDS of a common substance used in the plant (hexane - Acton, toluene - Adams).

a. Indentification of product - chemical name and supplier

b. Hazardous compounds of mixture - components and percentages

c. Physical data - density

d. Fire and explosion information - flash point, LEL, fire fighting procedures

e. Health data - most important section - effects of overexposure, first aid

f. Reactivity - does not apply to products used

g. Spill procedures

h. Personal protection - protection depends on how material is handled

i. Other precautions - catch all - re-emphasize main hazards

Define the following terms:

a. Carcinogenic

b. Mutagenic

c. Teratogenic

d. Neurotoxic

V. Employee Rights and Procedures

a. Workplace Notice

Poster will be displayed detailing your rights when the Department of Labor sends it to us. It will be similar to the ones already on the bulletin board.

b. Request of an MSDS

To look at an MSDS, ask the Right-to-Know Plant Coordinator. The book is always available for examination.

To get a copy of an MSDS, a written request must be given to the Plant Coordinator. We will provide copy within 4 days. If there is no MSDS available for the substance you are interested in and you would like to see it, this request must also be in writing. Some materials do not require an MSDS because they are not listed by Massachusetts as being hazardous. The Plant Coordinator or myself can help you with questions on these.

c. Work Refusal

For any written request, Grace must provide the requesting employee with an MSDS or valid written response within 4 days. Otherwise, the requesting employee may refuse to work with the substance if the employer has not shown a diligent effort to obtain such information. Refusal only applies to handling the substance or being exposed to it. It does not warrant complete refusal to work anywhere else.

Adams side light -- We currently have MSDSs for all hazardous raw materials used in the plant.

d. Employee Discrimination

An employee cannot be discriminated, disciplined or discharged for a work refusal allowed under the law.

e. Formal Complaint

If you feel that you were discriminated, disciplined or discharged for an allowed refusal, you can file a formal complaint with the Department of Labor, after which the DOL may hold a hearing on your case. Any decision by the DOL may be appealed to the Superior Court. Talk with your union or the Plant Coordinator if you have specific questions about your refusal rights.

VI. Overview of Workplace Hazards for Adams

a. Flammability

Associated with tolune, tank farm, and other flamable solvents.
Hazards - explosions, uncontrolled fires.
Precautions - no smoking, fire extinguishers and the CO_2 system.

b. Fumes

Associated with toluene and all other solvents, compounding room and all coating lines.
Hazards - narcosis, asphyxiation.
Precautions - hoods, vents, signs.

c. Dust

Associated with all fine powders and grinding.
Hazards - lung irritation.
Precautions - cyclones, hoods, dust masks when appropriate.

VII. Questions

GWS/mlr/13
9/11/84

Gary W. Siegel
September 11, 1984

Right - 12 - KOW
Jen

1-NITROPROPANE

WARNING

FLAMMABLE LIQUID

AVOID CONTACT WITH HYDROXIDES, BASES

AND OTHER REDUCING AGENTS

AS VIOLENT REACTIONS CAN OCCUR

AVOID BREATHING VAPORS

AVOID CONTACT WITH SKIN AND EYES

DO NOT INGEST

First Aid: Skin contact -- wash thoroughly with soap and water
Eye conctact -- flush with copius amounts of water; consult a physician
Ingestion -- do not induce vomiting; consult a physician immediately
Overexposure to vapors -- remove to fresh air, supply oxygen, if necessary; consult a physician

SAFETY DATA

W. R. GRACE & CO., POLYFIBRON DIVISION
Harmony Street
Adams, Massachusetts 01220

EMERGENCY PHONE NO.: (413) 743-0546

SECTION I -- IDENTIFICATION

Product Trade Name:	Polyfibron Back Cleaner
General Description:	Solvent-based Cleaner
Physical Description:	Clear, white liquid with mild chloroform odor

SECTION II -- INGREDIENTS

		CAS #	% by Weight
Hazardous Ingredients:	1,1,1-Trichlorethane	71-55-6	55
	1-Nitropropane	108-03-2	43
Non-hazardous Ingredients:			2

SECTION III -- PHYSICAL DATA

Initial Boiling Point	74°C (165.2°F)
Vapor Pressure:	<100 mm Hg @ 20° C
Vapor Density:	Heavier Than Air
Specific Gravity:	1.16
Percent Volatile:	100%

SECTION IV -- FIRE AND EXPLOSION DATA

Solvent Flash Point (Open Cup):	> 50°C (120°F)
Lower Explosive Limit:	Approximately 4%
Extinguising Media:	Water spray, foam carbon dioxide, dry chemical extinguisher
Unusual Fire Hazards:	None

SECTION V -- HEALTH HAZARD DATA

Threshold Limit Value:	25 ppm (90 mg/m^3)
Effects of Overexposure:	The vapor may irritate the eyes and respiratory system; it is narcotic in high concentrations. The liquid may irritate the skin; it irritates the eyes without causing serious damage, and it is harmful if swallowed.
First Aid:	For overexposure to vapor; remove to fresh air, give oxygen, if necessary, consult a physician. For eye contact; flush with water for at least 10 minutes, consult a physician. If swallowed; do not induce vomiting. Dilute stomach with water, contact a physician immediately. If contacted with skin; wash with soap and water.

SECTION VI -- REACTIVITY DATA

Hazardous Polymerization:	Cannot Occur
Stability	Stable
Incompatibility:	Reacts violently with hydroxides and all inorganic bases.

SECTION VII -- SPILL OR LEAK PROCEDURES

Steps to be taken in case material is spilled:	For a small spill, absorb material on paper, vermiculite or any floor absorbent and transfer to a hood. Clean spill site with soap and water.
Waste Disposal Method:	Allow volatile portion to evaporate in hood. Dispose of remaining material in accordance with applicable regulations.

SECTION VIII -- SPECIAL PROTECTION INFORMATION

Respiratory:	Provide adequate ventilation in order to prevent vapors from accumulating to a level above the TLV. If TLV is exceeded, use a NIOSA-approved chemical cartridge respirator.
Protective Gloves:	Avoid skin contact, wear gloves if prolonged skin exposure is expected.
Eye Protection:	Recommended.

SECTION IX -- SPECIAL PRECAUTIONS

None

Date Prepared - Sept. 4, 1984
by Gary W. Siegel

SAFETY DATA

W. R. GRACE & CO., POLYFIBRON DIVISION
Harmony Street
Adams, Massachusetts 01220

EMERGENCY PHONE NO.: (413) 743-0546

SECTION I -- IDENTIFICATION

Product Trade Name:	Polyfibron Cylinder Cleaner
Chemical Family:	Chlorinated Hydrocarbon
Chemical Name:	Methylene Chloride
Formula:	CH_2Cl_2
CAS Number:	75-09-2

SECTION II -- PHYSICAL DATA

Initial Boiling Point:	40° to 42°C (104°F)
Vapor Pressure:	349 mm Hg @ 20°C
Vapor Density (Air = 1):	2.93
Specific Gravity:	1.33

SECTION III -- FIRE AND EXPLOSION DATA

Solvent Flash Point:	Not applicable
Lower Explosive Limit:	15.5%
Extinguishing Media:	Water spray, carbon dioxide, dry chemical extinguisher
Unusual Fire Hazards:	When involved in fire, methylene chloride emits highly toxic fumes.

SECTION IV -- HEALTH HAZARD DATA

Threshold Limit Value (TLV):	200 ppm (700 Mg/lm^3)
Effects of Overexposure:	The vapor irritates the eyes and respiratory system and may cause headache and nausea; high concentration may result in cyanosis and unconsiousness. The liquid is extremely dangerous to the eyes.
First Aid:	For overexposure to vapor, remove to fresh air, give oxygen if necessary, consult a physician.
	For eye contact; flush with water for at least 10 minutes, seek medical attention immediately.
	If swallowed; do not induce vomiting, dilute stomach with water, contact a physician.
	If on skin; wash area thoroughly with soap and water.

SECTION V -- REACTIVITY DATA

Hazardous Polymerization:	Cannot occur
Stability:	Stable
Incompatibility:	Reacts violently with Li, Na, N_2O_4, HNO_3 and hot aluminum.

SECTION VI -- SPILL OR LEAK PROCEDURES

Steps to be taken in case material is spilled:	For a small spill, absorb material on paper, vermiculite, or any floor absorbent and transfer to a hood. Clean spill site with soap and water.
Waste Disposal Method:	Allow volatile portion to evaporate in hood. Dispose of remaining material in accordance with applicable regulations.

SECTION VII -- SPECIAL PROTECTION INFORMATION

Respiratory:	Provide adequate ventilation in order to prevent vapors from accumulating to a level above the TLV. If TLV is exceeded, use a NIOSA approved chemical cartridge respirator.
Protective Gloves:	Avoid skin contact, wear gloves if prolonged skin exposure is expected.
Eye Protection:	Always recommended as material is dangerous to the eyes.

SECTION IX -- PRECAUTIONS

None

Date Prepared - September 4, 1984
by Gary W. Siegel

SAFETY DATA

W. R. GRACE & CO., POLYFIBRON DIVISION
Harmony Street
Adams, Massachusetts 01220

EMERGENCY PHONE NO.: (413) 743-0546

SECTION I -- IDENTIFICATION

Product Trade Name:	Metro Edge Sealing Compound
General Description:	Solvent-based Adhesive
Physical Description:	Smooth, black solution with acetene odor

SECTION II -- INGREDIENTS

		CAS #	% by Weight
Hazardous Ingredients:	Methyl Ethyl Ketone	78-93-3	85
Non-hazardous Ingredients:	Adhesive Resin		15

SECTION III PHYSICAL DATA

Initial Boiling Point:	80°C (176°F)
Vapor Density (Air = 1)	2.5
Specific Gravity:	0.85
Water Soluble:	yes
Percent Volatile:	85%

SECTION IV -- FIRE AND EXPLOSION DATA

Solvent Flash Point (Closed Cup):	$-9^{o}C$ ($16^{o}F$)
Lower Explosive Limit (Solvent):	1.7%
Extinguishing Media:	Water spray, dry chemical or carbon dioxide
Unusual Fire & Explosion Data:	Keep away from sources of ignition; solvent is considered highly flammable.

SECTION V -- HEALTH HAZARD DATA

Threshold Limit Value:	200 ppm (590 mg/m^3)
Effects of Overexposure:	Inhalation of vapor may cause dizziness, headache, nausea. The liquid irritates the eyes and may cause severe damage. If swallowed, may cause gastric irritation and narcosis. Weak teratagen.
First Aid:	For overexposure to vapor; remove to fresh air, give oxygen if necessary, consult physician. For eye contact; flush with water for at least 10 minutes. Seek medical attention immediately. If swallowed; do not induce vomiting, dilute stomach with water, contact a physician.

SECTION VI -- REACTIVITY DATA

Hazardous Polymerization:	Cannot Occur
Stability:	Stable
Incompatibility:	Vigorous reaction with chloroform in the presence of bases. Explosive peroxides formed by action of H_2O_2/HNO_3.

SECTION VII -- SPILL OR LEAK PROCEDURES

Steps to be taken in case material is spilled:	For a small spill, absorb material on paper, vermiculite or any floor absorbent and transfer to a hood. Clean spill site with soap and water.
Waste Disposal Method:	Allow volatile portion to evaporate in hood. Dispose of remaining material in accordance with applicable regulations.

SECTION VIII -- SPECIAL PROTECTION INFORMATION

Respiratory:	Provide adequate ventilation in order to prevent vapors from accumulating to a level above the TLV. If TLV is exceeded, use a NIOSA-approved chemical cartridge respirate.
Protective Gloves:	Avoid skin contact, wear gloves if prolonged skin exposure is expected.
Eye Protection:	Always recommended as solution is dangerous to the eyes.

SECTION IX -- SPECIAL PRECAUTIONS

None

Date Prepared - September 4, 1984
by Gary W. Siegel

G. W. Siegel
August 28, 1984

ADAMS MATERIAL SAFETY DATA SHEET REQUEST LIST

Company Name and Address	Product Names(s)
B. F. Goodrich Chemical Group 385 Elliot Street Newton Upper Falls, MA 02164	Estane 5891 Black 288 Estane 5716 Adhesive Polymer Hycar 1571
Dearborn 300 Genesee Street Lake Zurich, IL 60047	Steamate #2004 Polymate 150 Polymate 160 Polymate 159 Dearborn 62 Dearcide 702 Polytrol D-17-80 Firemate 30 Chemical Biocide 716
Astro Chemicals Inc. 70 Shaws Lane Springfield, MA 01101	Liquid Caustic Soda 50% Sulphuric Acid
Oxygen & Welding Co. 456 Ashland Street North Adams, MA 01247 413-664-6728	Acetylene
Airco Industrial Gases Division Airco Inc. Off Lawsbrook Road Acton, MA 01720	Liquid Nitrogen
Whitney & Oettler P. O. Box 8024 Savannah, GA 31402	Turgum S
R. T. Vanderbilt & Co. 30 Winfield Street Norwalk, CT 06855	Age Rite White Unads Fine Thermal Carbon Black

Rohm and Haas Company Independence Mall West Philadelphia, PA 19105	Rhoplex E-358 Acrysol ASE-60
Harwick Chemical Co. Eight Jewell Drive Wilmington, MA 01887	Sulfasan R-Monsanto
American Cyanamid Co. Industrial Products Division 201 University Avenue Westwood, MA 02090	Calco Oil Black
Bostik Division Emhart Corporation Boston Street Middletown, MA 01949	Bostik 7906 Polyester Adhesive
Dow Chemical Company 20 William Street Wellesley, MA 02181	Methocel K15M
Ferro Corporation Chemical Division 7050 Krick Road Bedford, OH 44146	Therm-Chek 6V6A
Occidental Chemical Corp. Hooker Industrial & Specialty Chemical 360 Rainbow Boulevard Box 728 Niagara Falls, New York 14303	Hexa #26309 (Urotropin)
E. I. duPont deNemours & Co. Polymer Products Department 1007 Market Street Wilmington, Delaware 19898	DuPont Polyester Adhesive Nalon W Durable Water Repellent
Celanese Plastics & Specialties Co. One Riverfront Plaza Louisville, Kentucky 40202	Jaguar CMHPG-1

Dayton Coatings and Chemicals Division Whittaker Corporation 10 Electric Street West Alexandria, Ohio 45381	THIXON 710-1
Thiokol/Ventron Division 150 Andover Street Danvers, MA 01923	Thiokol TP-908
Uniroyal Chemical Division Uniroyal Inc. 1230 Avenue of the Americas New York, New York 10020	TRIMENE BASE
Exxon Company, USA P. O. Box 2180 Houston, Texas 77001	VARSOL 1 VARSOL 2 Terrisstic #68 Terrisstic #150
S. D. Warren 199 Wells Avenue Newton, MA 02159	Transcote CZ CIS
Kenrich Petrochems Inc. East 22nd Street Bayonne, NJ 07002	Kenmix K-26417 Kenmix K-26418
Peter Matonis W. R. Grace & Co. Organic Chemicals Division 55 Hayden Avenue Lexington, MA 02173	Polyvinylidene Chloride
Reed Lignin, Inc. 81 Holly Hill Lane Greenwich, CT 06830	Marasperse N-22
E. I. duPont deNemours & Co. Chemicals & Pigments Dept. 1007 Market Street Wilmington, Delaware 19898	Avitex 2153 Surfactant
Pierce & Stevens Chemical Corp. P. O. Box 1092 Buffalo, New York 14240	Hybond 80 NF

Frekote Inc. 170 Spanish River Boulevard Boca Raton, Florida 33431	Frekote 34
Fisher Scientific Co. 461 Riverside Avenue Medford, MA 02155	Methyl Isobutyl Ketone (M-213) Hydrochloric Acid Potassium Chloride (P-217) Cuprous Chloride (C-457) Sulfamic Acid (Δ A-295) Salicylic Acid (A-277)

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

Since Grace must compile books of the MSDSs used by the plant and incorporate them as part of our employee training, we would appreciate a response as soon as possible, but no later than September 15, 1984.

If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

B. F. Goodrich Chemical Group
385 Elliot Street
Newton Upper Falls, Massachusetts 02164

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

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Estane 5891 Black 288
Estane 5716 Adhesive Polymer
Hycar 1571

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Dearborn
300 Genesee Street
Lake Zurich, Illinois 60047

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Steamate #2004	Dearcide 702
Polymate 150	Polytrol
Polymate 160	D-17-80
Polymate 159	Firemate 30
Dearborn 62	Chemical Biocide 716

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Astro Chemicals Inc.
70 Shaws Lane
Springfield, Massachusetts 01101

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Liquid Caustic Soda 50%
Sulphuric Acid

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Oxygen & Welding Co.
456 Ashland Street
North Adams, Massachusetts 01247

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Acetylene

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Airco Industrial Gases Division
Airco Inc.
Off Lawsbrook Road
Acton, Massachusetts 01720

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Liquid Nitrogen

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Whitney & Oettler
P. O. Box 8024
Savannah, Georgia 31402

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Turgum S

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

R. T. Vanderbilt & Co.
30 Winfield Street
Norwalk, Connecticut 06855

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Age Rite White
Unads
Fine Thermal Carbon Black

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Rohm and Haas Company
Independence Mall West
Philadelphia, Pennsylvania 19105

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Rhoplex E-358
Acrysol ASE-60

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Harwick Chemical Co.
Eight Jewell Drive
Wilmington, Massachusetts 01887

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Sulfasan R-Monsanto

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

American Cyanamid Co.
Industrial Products Division
201 University Avenue
Westwood, Massachusetts 02090

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Calco Oil Black

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Bostik Division
Emhart Corporation
Boston Street
Middletown, Massachusetts 01949

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Bostik 7906 Polyester Adhesive

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Dow Chemical Company
20 William Street
Wellesley, Massachusetts 02181

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Methocel K15M

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Ferro Corporation
Chemical Division
7050 Krick Road
Bedford, Ohio 44146

To Whom It May Concern:

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A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Therm-Chek 6V6A

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

Since Grace must compile books of the MSDSs used by the plant and incorporate them as part of our employee training, we would appreciate a response as soon as possible, but no later than September 15, 1984.

If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Occidental Chemical Corp.
Hooker Industrial & Specialty Chemical
360 Rainbow Boulevard
Box 728
Niagara Falls, New York 14303

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Hexa #26309 (Urotropin)

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

E. I. duPont de Nemours & Co.
Polymer Products Department
1007 Market Street
Wilmington, Delaware 19898

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

DuPont Polyester Adhesive
Nalon W Durable Water Repellent

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Celanese Plastics & Specialties Co.
One Riverfront Plaza
Louisville, Kentucky 40202

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Jaguar CMHPG-1

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Dayton Coatings and Chemicals Division
Whittaker Corporation
10 Electric Street
West Alexandria, Ohio 45381

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

THIXON 710-1

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Thiokol/Ventron Division
150 Andover Street
Danvers, Massachusetts 01923

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Thiokol TP-908

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Uniroyal Chemical Division
Uniroyal Inc.
1230 Avenue of the Americas
New York, New York 10020

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

TRIMENE BASE

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Exxon Company, USA
P. O. Box 2180
Houston, Texas 77001

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

VARSOL 1
VARSOL 2
Terrisstic #68
Terrisstic #150

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

S. D. Warren
199 Wells Avenue
Newton, Massachusetts 02159

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Transcote CZ CIS

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Kenrich Petrochems Inc.
East 22nd Street
Bayonne, New Jersey 07002

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Kenmix K-26417
Kenmix K-26418

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

W. R. Grace & Co.
Organic Chemicals Division
55 Hayden Avenue
Lexington, Massachusetts 02173

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Polyvinylidene Chloride

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Reed Lignin, Inc.
81 Holly Hill Lane
Greenwich, Connecticut 06830

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Marasperse N-22

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

E. I. duPont de Nemours & Co.
Chemicals & Pigments Dept.
1007 Market Street
Wilmington, Delaware 19898

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Avitex 2153 Surfactant

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Pierce & Stevens Chemical Corp.
P. O. Box 1092
Buffalo, New York 14240

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Hybond 80 NF

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Frekote Inc.
170 Spanish River Boulevard
Boca Raton, Florida 33431

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Frekote 34

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

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Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

Fisher Scientific Co.
461 Riverside Avenue
Medford, Massachusetts 02155

To Whom It May Concern:

As you are probably aware, regulations concerning the Massachusetts Right-to-Know Law (Chapter 470 of the Acts of 1983) become effective September 26, 1984. As an employer in Massachusetts, Grace is required to provide its employees with Material Safety Data Sheets (MSDS) for any chemical substance or mixture of substances used by the employees which is listed in the Massachusetts substance list.

A recent inventory of the W. R. Grace & Co. facility in Adams, Massachusetts revealed that Grace currently buys and/or has in stock the following products:

Methyl Isobutyl Ketone (M-213)
Hydrochloric Acid
Potassium Chloride (P-217)
Cuprous Chloride (C-457)
Sulfamic Acid (Δ A-295)
Salicylic Acid (A-277)

A further check has revealed that our Adams plant either does not have an MSDS for the above products or the ones that we have in our file do not comply with the MSDS information requirements specified in the Department of Labor Regulations (441 CMR 21.06). Specifically, these regulations require the chemical name, CAS #, and percentage of each toxic or hazardous substance in the product. Additionally, if any of the substances has been identified as a suspected carcinogen, neurotoxin, mutagen and/or teratagen, or listed as such by the Massachusetts Department of Public Health, such information must be listed on the MSDS.

Since Grace must compile books of the MSDSs used by the plant and incorporate them as part of our employee training, we would appreciate a response as soon as possible, but no later than September 15, 1984.

If you have any questions concerning this request or on the specific Massachusetts requirements, you may contact me at the above number or Henry Johnson at the Adams plant, (413) 743-0546. Material Safety Data Sheets should be sent to me at the address in our letterhead.

Thank you for your attention, and Grace looks forward to doing business with you in the future.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/8

cc: Henry A. Johnson
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

Denise C. McKinnon
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

August 28, 1984

American Cyanamid Co.
Industrial Products Division
1 Cyanamid Plaza
Wayne, New Jersey 07470

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Calco Oil Black

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W. R. Grace & Co.
55 Hayden Avenue
Lexington, Massachusetts 02173

THE BERKSHIRE EAGLE
JAN. 19, 1990

Discussion begun on contamination at city landfill

By Erik Bruun
Berkshire Eagle Staff

NORTH ADAMS — City and state officials have begun preliminary work to assess the extent of contamination from hazardous waste at the city landfill.

Administrative Officer Fred Holmes and representatives from W.R. Grace Co. and Sprague Electric Co. met Tuesday with state Department of Environmental Protection officials to discuss options on how to evaluate possible pollution at the landfill.

"We're not saying we have a problem, but we have to find out," DEP regional engineer Stephen Joyce said. "Every landfill in the state has had substances put into it. What we're trying to determine here is if there is any damage."

Joyce said there will be another meeting next month to determine what steps will be taken and who will pay for a hazardous waste site assessment if one is needed.

Concerns about the landfill have been raised recently by teachers at nearby Drury High School.

Joint venture

Mayor John Barrett III said yesterday the city would most likely undertake a site assessment and has requested that Sprague and W.R. Grace contribute to the costs of the report. Both companies dumped hazardous waste materials in the landfill in the 1970s.

Barrett said he would like them to contribute $25,000 each for the report. "It would be a small price to pay and would prevent problems in the future," he said.

If a site assessment is done and the landfill is determined to be a hazardous waste site, the city would have to complete a costly full environmental assessment of the impact of the contamination and develop a way to contain it or clean it up, according to the state's cleanup procedures.

Preliminary water monitoring tests by O'Brien & Gere Engineers, Pittsfield, show that the landfill has not contaminated ground water, Barrett said. The work by O'Brien & Gere is separate from a site assessment and is part of a regular monitoring program at the landfill that was recently reinstituted. The last time ground water monitoring was done was in 1983, state records show.

Barrett said that there has been leaching of hazardous waste and that more tests will be done to determine the extent of damage.

"Preliminary tests show that it doesn't appear to threaten the high school, but we want to go a step further, which is to do a site assessment," he said. "It's something we recognize, and we're moving ahead with it."

Joyce said a site assessment would be more comprehensive than the ground water tests.

Barrett said W.R. Grace and Sprague Electric have been cooperative in the preliminary negotiations with the city.

Grace officials said yesterday that the company would take part in the preliminary work. But they said it was too early to tell how much the company would contribute to the process until it is known how much waste it dumped at the landfill.

According to state documents, the Adams landfill is listed as a possible hazardous waste site because of waste dumped there by Grace prior to 1980.

Sprague counsel Augustus I. DuPont also said he could not comment on Sprague's responsibility for any contamination of the North Adams landfill as the process is in the preliminary stages.

According to former Sprague workers, the company dumped many barrels of contaminated waste at the landfill over the course of several years before closing in 1984.

State: Companies may be resporisible for landfi

By MICHAEL L. COHEN
Transcript staff

NORTH ADAMS — The city may not be left holding the bag at the landfill.

The cost to study the landfill, and take whatever action is necessary may be borne, in part, by the companies that dumped hazardous materials at the landfill.

Officials from North Adams and the state Department of Environmental Protection met this morning in Springfield to discuss who dumped what at the landfill and who may be responsible for the hazardous waste there.

"We're trying to identify potentially responsible parties," Stephen Joyce, regional engineer for DEP, told The Transcript today.

Joyce said if responsible parties are identified, they would be asked to help pay for the study, and if necessary, the cleanup of hazardous waste at the landfill.

"We want to see something done. If a party deposited hazardous material there, it behooves them to take some responsibility for the cost of (site) assessments," Joyce said.

Joyce said there is precedent in Massachusetts where companies have been held accountable for materials dumped in landfills.

"It's fair to go back to the parties who did it," Joyce said.

Site Assessment, which is required by state law before the North Adams landfill can be closed, is a detailed study of hazardous waste sites to determine the level of risk posed by the site to public and the environment.

The North Adams landfill has been listed by the state as a potential hazardous waste site since 1982. A total site assessment of the landfill will cost several hundreds of thousands of dollars.

"If we have to do it (pay for the cost of the assessment) alone, I might as well turn over the keys of the city to the state," Mayor John Barrett III said today.

Likewise, the state is sensitive to the enormous costs associated with hazardous waste sites.

"I know the (financial) state the city is in, and we are very conscious of that," Joyce said.

According to state law, if a p
hazardous waste site, that pa
of the site.

Barrett said Fred Holmes,
letter from O'Brien and Gen
legal meeting.

"I don't think there is any
the landfill. And the city is a
waste there," Barrett said.

The meeting was scheduled

Joyce said he invited repre
W.R. Grace Company to sit in

"I don't know if they are co
Joyce said.

Both W.R. Grace and Sprag
for years.

See

The Transcript

"We hold the weste

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and Sou

147TH YEAR — No. 111 NORTH ADAMS, MASSACHUSETTS TUESDAY, JANUARY 16, 1990

Landfill

(Continued from page 1)

William Cooper, former supervisor of the salvage operation at Sprague, has said repeatedly that hazardous waste, including polychlorinated biphenyls (PCBs), from Sprague's operations were dumped in the landfill.

Today, officials at neither company could be reached for comment.

"If they've smart, they'll be there today," Barrett said.

Barrett hopes today's meeting will be the beginning of a process that will lead to a full study of the landfill and containment of material that may be leaching out of the landfill.

"My discussions with the DEP on this matter have been very candid, and that's nice for a change. We have to contain that landfill now and for future generations to make sure whatever leaches out is collected and does not get into the groundwater," Barrett said.

ATTACHMENT 2

ADAMS

REC. ENG. SEP 12 1975

TO: J. F. Murphy, Jr.

DATE: September 11, 1975

FROM: D. L. Hartford

SUBJECT: Solvent Disposal Problems - Adams

CC: J. F. McAfee
T. O. Gavin

The following information on the present drummed solvent waste generated in Adams will give you an idea as to what problems would have to be contended with whatever our future course of action might be concerning disposal.

There are four major solvents that are used in various processes in any significant quantity: (1) TOL (toluene), (2) PEDE (propylene dichloride), (3) MEK (methyl ethyl ketone), (4) ONE (isopropanol).

Toluene, by far, comprises the largest quantity of waste solvent. Used on the In-Line Coater process, waste TOL is generated at a rate of 55 gallons per week. Flushing of the compound lines and guns is required each Friday or the compound will set up over the weekend.

A portion of the TOL waste could be recycled back into the compound. However, this is not done presently because of the trouble and expense involved in (1) making sure the recycle is kept clean and (2) the separate system required to pump the recycle from the drum to the batcher.

MEK and ONE are used in the epoxy saturation process. Very little flushing is required after the run since the epoxy saturants do not set up as readily as the rubber solutions. MEK is used as the flushing medium with approximately 20 to 30 gallons required per week for each cleaning.

ONE is not used for flushing because MEK is so much stronger. For that reason practically no waste ONE is generated. It is used as a general grease cutting cleaning solvent where skin contact would generally be required.

PEDE is used in the textile rubber compounds. An average of 15 to 20 gallons of this solvent is used each week for flushing Cuno filters and washing down batchers. The lines to the coaters are pretty much trouble free and do not require flushing on a scheduled basis.

The contents of a typical solvent waste drum would approximate the following:

TOL - 70% PEDE - 10% MEK - 10%
ONE - .5% Solids - 9.5%

The solids would be made up of approximately 80% Nitril rubber and 20% fillers, cures and resins. These solids would naturally settle out in any distillation process and have to be contended with. At this time the plant is not disposing of any solidified rubber in the North Adams landfill.

Another waste solvent that is generated within the system is the 8-ounce jars of laboratory samples. 80% of these samples are liquid solvent, the other 20% being compound samples. The jars are presently put into 55 gallon fiber packs and generated at the rate of one per month.

Waste #6 fuel oil is generated at 20 to 30 gallons each month. In the past this has been disposed of by incineration by an outside firm.

The plant has had 105 drums of waste solvent disposed of by Silresim Chemical Corp., Lowell, Mass. in two different lots. On December 14, 1973 33 55-gallon drums were picked up at $19.50 per drum. On July 25, 1974, 72 drums were disposed of at $21.50 per drum. This figures out to 112.5 drums on an annualized basis. The plant estimates 100 - 125 drums per year being normal.

Before last Friday operators were allowed to deposit general paper waste, solvent laden rags and cups, solidified rubber and liquid solvent into the same drum. Since that time a sorting system has been initiated whereby the waste flush solvent is kept separate from the rags, cups and solid rubber. A third container will be used for the paper waste. Hopefully, this will cut down on the rate at which drums are taken to the storage area by Building 8.

DLH

D. L. Hartford

DLH:sml

F

W. R. GRACE & CO.
INDUSTRIAL CHEMICALS GROUP
62 WHITTEMORE AVE., CAMBRIDGE, MASS 02140

February 17, 1976

Stephen M. Leonard, Esq.
Assistant Attorney General
Environmental Protection Division
131 Tremont Street, Room 800
Boston, Massachusetts 02111

Re: Hazardous Waste Board vs.
W. R. Grace & Co., and
City of North Adams

Dear Mr. Leonard:

Enclosed herewith is the original of a consent judgment in the above-referenced matter which contains the terms we had discussed. Said judgment has been signed by me on behalf of W. R. Grace & Co.

Also enclosed is a check in the amount of $2000 made payable to the "Commonwealth of Massachusetts Environmental Fund" in payment of the civil penalty as stated in the consent judgment. I would appreciate it if you would advise me by telephone when the complaint and judgment are filed in this matter. I may be reached here in Cambridge at 876-1400 ext 584.

Very truly yours,

Allan R. Campbell
Assistant Counsel

ARC:sel

bcc: T. O. Gavin
E. S. Wood

THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF THE ATTORNEY GENERAL
JOHN W. Mc CORMACK STATE OFFICE BUILDING
ONE ASHBURTON PLACE, BOSTON 02108

FRANCIS X. BELLOTTI
ATTORNEY GENERAL

FEB 02 1976

January 26, 1976

Allan Campbell, Esquire
W. R. Grace Company
62 Whittemore Street
Cambridge, Massachusetts

Re: Hazardous Waste Board v. W. R. Grace and North Adams

Dear Mr. Campbell:

Enclosed for your signature is the original of a Consent Judgement in the terms which have been outlined. Please return it to this office for filing with the court.

Also enclosed are copies of the Judgement and of the Complaint; the latter will be filed at the same time as the Judgement.

Thank you for your cooperation in this matter.

Very truly yours,

Charles Corkin II
Chief
Environmental Protection Division

CCII:SML:dap
Enclosures

City of

COMMISSIONER OF PUPLIC WORKS
JOSEPH J. GIRARDI

NORTH ADAMS
MASSACHUSETTS

July 31, 1975

RECEIVED
AUG 1 1975
GRACE — ADAMS

Mr. Lionel Roy
W. R. Grace Company
Harmony Street
Adams, Massachusetts 01220

Dear Mr. Roy:

I have presented your question on the disposal of your containers to the Board of Health. The answer I received was verbal and very vague.

I was informed by Mr. Heisler that it was favorable to dispose of the liquid containers but not the solid waste.

It was his contention that underground fires would be fed by this by-product and would be dangerous.

I was also informed by Mr. Heisler that I could have the authority to make a suitable location to receive the barrels of waste and liquid and dispose of them as I see fit.

This letter is to inform you that I will accept the barrels that contain liquid and those that have rubbish, but you will have to dispose of the solid type elsewhere.

I must insist that you call this office one day before you dispose of the above items so that I can make the necessary arrangements for disposal at our Landfill Area.

Yours truly,

Joseph J. Girardi

Joseph J. Girardi
COMMISSIONER OF PUBLIC WORKS

JJG/r

Arrangement made to have it loaded at the land fill Aug 11 AM on Thursday Aug 7th

SEP 9 1975

4M-1-71-048519

THE COMMONWEALTH OF MASSACHUSETTS

WATER RESOURCES COMMISSION

DIVISION OF WATER POLLUTION CONTROL
1 DRAPER HALL, UNIVERSITY OF MASSACHUSETTS
AMHERST 01002

WESTERN REGIONAL OFFICE

September 10, 1975

Mr. Albert P. Denelli, Chief
Fire Department
State Street
North Adams, Massachusetts 02147

Re: Adams-Hoosic-HAZ
W. R. Grace Company

Dear Chief Denelli:

On September 3, 1975 this office was informed by [illegible] Cirrdi, Superintendent of Public Works in North Adams, that you had analyses made of the liquid disposed of by W. R. Grace Company in the city's landfill. Would you please forward a copy of the test results to this office?

Your cooperation and immediate response to the above request would be greatly appreciated.

Very truly yours,

William A. Doubleday, P.E.
Regional Engineer

[illegible]/lcv

cc: Mayor [illegible]
✓ [illegible] Cirrdi
[illegible]

Certified 720218

COPY

The City of

NORTH ADAMS

Massachusetts

ALBERT P. DENELLI
FIRE CHIEF

September 12, 1975

William A. Doubleday, P.E.
The Commonwealth of Massachusetts
Water Resources Commission
1 Draper Hall
University of Massachusetts
Amherst, Massachusetts

Dear Mr. Doubleday:

I received your letter dated September 10, 1975. In regards to this letter, I did not have an analysis made of the liquid dumped at the city landfill area. However, we did call Chemtrec at 12:55 P.M. on 8/23/75, a national 24 hour service on chemicals. This was to determine if there was a fire or an explosive hazard. We talked to a Mr. Chasen and he informed us that there was no potential fire-explosion hazard at the city landfill area, as the liquid was dumped into the ground.

Our inquiry was made only to determine the public safety factor involved, with the chemical in it's present state, that is after it has been disposed into the ground.

On 9/4/75, we read a news article that stated that another chemical, propylenetrichloride might have also been dumped at the landfill area. At 2:40 P.M. the same day, we again called Chemtrec and talked to a Mr. Wallace. He could not find this chemical listed, but did find propylenedichloride and said that this chemical did not give any immenent danger to a fire or explosive hazard in the landfill area where the liquid was dumped. Also, he stated that the W. R. Grace Company was listed there and that he could not find these chemicals listed for said company.

Both chemicals were supposedly dumped the same day. If any other chemicals were involved, this department was not made aware of it.

This information was again requested only for the concern of the public safety in the city landfill area.

Respectfully yours,

Albert P. Denelli
Fire Chief

APD/cmp

cc: Mayor Bianco

THE COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF THE ATTORNEY GENERAL

JOHN W. Mc CORMACK STATE OFFICE BUILDING
ONE ASHBURTON PLACE, BOSTON 02108

FRANCIS X. BELLOTTI
ATTORNEY GENERAL

DEC 23 1975

December 17, 1975

Mr. Thomas Gavin
Manager
W.R. Grace Company
Adams, Massachusetts

Dear Mr. Gavin:

You are requested to appear at a conference in this office on Tuesday, January 13, 1976, at 2:00 p.m. to discuss an incident in which, it is alleged, drums of hazardous material belonging to the W.R. Grace Company of Adams were deposited on the Adams Landfill. You may be accompanied by counsel if you wish.

Mr. Girardi, Commissioner of Public Works, and Mr. Heisler, Sanitarian of North Adams, are receiving similar invitations.

Very truly yours,

Charles Corkin II
Chief
Environmental Protection Division
131 Tremont Street, Room 800
Boston, Massachusetts 02111
(617) 727-2265

CCII:SML:dap

RECEIVED
DEC 22 1975
GRACE — ADAMS

4M-1-71-048519

THE COMMONWEALTH OF MASSACHUSETTS

WATER RESOURCES COMMISSION

DIVISION OF WATER POLLUTION CONTROL
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COPY

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Regional Engineer

WAD/RJD/lev

cc: Mayor Bianco
Mr. Girardi
Mr. H. Bonno

Certified 720218

The City of

NORTH ADAMS

Massachusetts

HEALTH DEPARTMENT

September 2, 1975

Mr. Joseph Girardi, Commissioner
Department of Public Works
City Hall
North Adams, MA 01247

Dear Mr. Girardi:

The Board of Health at its meeting on August 27th, discussed at length the recent disposal of wastes from the W. R. Grace Company of Adams at the North Adams Sanitary Landfill.

Regulations adopted by the Board of Health on January 20, 1972 specifically prohibit (Regulation 6) the disposal of such wastes at the site. In addition, Regulations of the Department of Public Health adopted on April 21, 1971, under the provisions of Section 150A, Chapter 111, General Laws, as inserted by Chapter 839 of the Acts of 1970 - Regulation 16.2 state that the "handling and disposal of certain chemicals and other hazardous wastes shall be in accordance with Sections 57 & 58 of Chapter 21 of the General Laws". (Generally, these wastes must be licensed by the Division of Water Pollution Control).

The Board regrets that such materials were disposed of at the North Adams Sanitary Landfill without steps being taken to enlist the formal aid of the Board in obtaining such a license, even if the Board, would not have been able to issue such a permit itself.

The Board wishes you to be aware of its willingness to be approached by you and others when problems arise and to render its assistance in having the letter of the law complied with.

Very truly yours,

Edmond P. Larkin M.D.

Edmond P. Larkin, M.D.
DIRECTOR OF HEALTH

EPL/fm

The City of

NORTH ADAMS

Massachuseffs

ALBERT P. DENELLI
FIRE CHIEF

September 12, 1975

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The Commonwealth of Massachusetts
Water Resources Commission
1 Draper Hall
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Respectfully yours,

Albert P. Denelli
Fire Chief

APD/csp

cc: Mayor Bianco

City of

COMMISSIONER OF PUPLIC WORKS
JOSEPH J. GIRARDI

NORTH ADAMS
MASSACHUSETTS

July 31, 1975

RECEIVED
AUG 1 1975
GRACE—ADAMS

Susan
Return to
merge for
folder
file

Mr. Lionel Roy
W. R. Grace Company
Harmony Street
Adams, Massachusetts 01220

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Yours truly,

Joseph J. Girardi

Joseph J. Girardi
COMMISSIONER OF PUBLIC WORKS

JJG/r

Arrangement made to have 1st load at the land fill by 11 AM on Thursday Aug 7th at

SEP 9 1975

The attached enclosed in envelope addressed to O. L. Favorito from T. O. Havin 9/6/75.

Girardi says city swaps dumping space for barrels

NORTH ADAMS—Joseph J. Girardi public works commissioner, said today the city gave some dumping space to an Adams firm but got 190 free barrels in return.

"That's five years worth of free barrels," said the commissioner who will use them to store sand on city streets during the winter. "It was beautiful. Nothing to it," he said.

The barrels came from W.R. Grace & Co., the textile manufacturer, which a week ago dumped 190 barrels of rags, rubbish and liquid waste at the North Adams landfill.

"If it wouldn't flow, I wouldn't take it," said Mr. Girardi, explaining that the company had his approval to dump the waste in North Adams. Some residents got excited about the deal, he said, and he knows why.

Mr. Girardi said the man who started complaints about the dumping is the city's usual barrel supplier. "He picks them up for nothing and sells them to us for $5.50, or so," said Mr. Girardi.

But there were no grounds for complaint, he said, refusing to name the man he suspects of making the first complaint. Mr. Girardi said he had an agreement from George Helaler, city sanitarian that the rubbish was not harmful.

Tuesday, September 2, 1975

Conference set with Grace

State investigating dumping of chemicals

NORTH ADAMS—The state division of water pollution control is investigating the dumping of waste material in the North Adams landfill.

Joseph Dupuis, sanitary engineer with the water pollution control division, said he will be in Adams today to talk with officials at W. R. Grace Co. about where the firm's toxic wastes have been going.

Almost two weeks ago, under an agreement between public works commissioner Joseph Girardi and the company, about 190 barrels containing rags, rainwater and some "solvent-based material" were dumped in the landfill. The dumping was in violation of local landfill regulations, as well as state public health regulations.

State law mandates that all hazardous wastes be transported by licensed carriers. Any dumping of chemicals into the landfill needs state water pollution and environmental engineering approval, said state officials from both offices today.

Glen Gilmore, sanitary engineer in the Boston environmental health office, said today the state does not issue permits to dump solvent-based materials into landfills.

Labels on two barrels indicated two substances, one an explosive, toxic solvent bonding agent Thoxin, and the other a relatively harmless water-based latex.

Thomas O. Gavin, plant manager at W.R. Grace said today none of the barrels contained Thoxin. He said the company uses all the Thoxin it receives, but uses the barrels to store discarded rags and other company produced waste.

Mr. Dupuis said he toured the W.R. Grace Co. in December 1973. He said the company had been stockpiling its toxic wastes in barrels. He said he gave the company manager a list of licensed carriers of toxic waste.

Mr. Gavin said the company disposes of its toxic waste through licensed carriers. When asked which carriers, he said, "A number of those authorized."

Although North Adams landfill regulations prohibit any chemical or liquid waste disposal, the waste liquid was dumped about two weeks ago. Mr. Gavin said he has a letter of authorization from Mr. Girardi.

Mr. Girardi said city sanitarian George Heisler approved the dumping, but Mr. Heisler has denied giving any such approval. Board of health members, who by state law must issue a permit for industrial waste disposal in the landfill, were not notified until after the waste was already buried.

Mr. Dupuis said if the barrels contained any hazardous material, W.R.Grace "would be in trouble." He also said the state division of water pollution control will want to know why the dumping was permitted.

"We are concerned about two things, pollution of the ground water supply and the possibility of explosion or fire," said another state sanitary engineer, Peter P. Mokrzesky of the department of public health.

Mr. Dupuis said, however, he is not sure what action the state will take nor what penalties can be imposed on the city or company.

Thursday, September 4, 1975

City, Grace in hot water over dumping of chemical

By PATRICIA S. PERKINS

NORTH ADAMS — The state division of water pollution control will recommend legal action against W. R. Grace Co. of Adams and the City of North Adams in the illegal dumping of industrial waste at the North Adams landfill, regional chief William Doubleday said today.

"Grace had full knowledge the stuff needs a licensed carrier. We'll go through the attorney general's office on it," Mr. Doubleday said.

A worker from the company called the North Adams Fire Department to complain about a possible fire hazard in dumping the industrial waste in the landfill, Chief Albert P. Denelli said. He said the informant listed the contents of the barrels, which included a flammable solvent, toluene.

Silresin Chemical Corp. of Lowell, a licensed carrier, in the past hauled toluene from the Adams plant for proper disposal, said state sanitary engineer R. Joseph Dupuis, who conducted an investigation on the dumping this week. Silresin was not involved in transporting anything to the city landfill.

Toluene is a solvent the vapors from which can explode when the temperature is above 40 degrees Fahrenheit. Transporting and disposing of it require a license from the state.

Also, state landfill regulations require a permit before any liquid or chemical waste is deposited in a municipal landfill. North Adams' own landfill regulations prohibit chemical or liquid wastes.

Chief Denelli said when the caller identified the contents of the barrels, he called a chemical emergency hotline for information about the fire hazard. He said he learned the chemical is a fire hazard, but not after it has been dumped in the dirt.

Mr. Dupuis said company officials said their industrial waste is not toluene, but propylenetrichloride. But state hazardous waste control officials said that solvent is also covered by state regulations and must be trucked by licensed carriers.

The number of barrels of volatile waste taken out by Silresin — over 100 — and the number dumped in the landfill "are in the same ballpark," Mr. Dupuis said.

"Unless they've changed their process, you can figure some of the dumped barrels contained toluene," said Mr. Dupuis.

Mr. Dupuis said when he visited the Grace Company in December 1973, the company was stockpiling waste in barrels. He gave company officials a list of licensed hazardous waste carriers then, he said.

Local and company officials have stressed the barrles contained mostly rainwater. But toluene is too flammable to be left in open drums to collect rainwater, Mr. Dupuis said.

"I'd be surprised if the fire marshal allowed them to store it in the open," he said.

Mr. Dupuis said he asked city public works commissioner Joseph J. Girardi, "Don't you know what is supposed to go in a landfill?" He said Mr. Girardi replied the health board controls landfill regulations.

Mr. Dupuis said he had "three different stories" about how the authorization for the dumping came about.

. Friday, September 5, 1975

Rejected because of cos

Chemical barrels offered to Readsboro, too

By MARK E. VOGLER

READSBORO, Vt.—Fifty barrels containing an industrial waste that ended up at the North Adams landfill were available to Readsboro "for free" provided the town transported and dumped the material itself, The Transcript has learned.

Brief discussion ended in selectmen's rejection of the offer for economic reasons weeks before W.R. Grace & Co. of Adams and the city of North Adams were suspected of illegally disposing of flammable chemicals believed to be in several of the barrels.

Regional Water Pollution Control chief William Doubleday yesterday said he planned to recommend to the Massachusetts attorney general's office that legal action be sought against the parties involved.

According to Readsboro administrative assistant Charles Dooley, North Adams Public Works Commissioner Joseph J. Girardi told him the barrels could be acquired from W.R. Grace at no cost to the community for use in the recycling program.

Mr. Girardi was unavailable for comment today. His office reported that he was out of town on a business assignment.

And a Grace official denied the Readsboro, report.

"Mr. Grardi was just trying to be helpful to small towns in finding out where they could get barrels for free. Selectmen had asked me to find out what was in the barrles. They rejected the idea because of the heavy transportation costs," Mr. Dooley said.

"I never found out what the material inside the barrels was, but was told that it was flammable. They told us we should dig a ditch and dump the stuff to take care of it," he said.

In a confidential note to selectmen last month, Mr. Dooley wrote, "I have discussed situation with Joe Girardi, North Adams Pub. Works Commissioner. He found a place that will give us barrels for free. W.R. Grace Co. on Harmony St. will give us barrels and load them for us on Friday August 15 at 10 a.m. The barrels contain a liquid that we must dump.

"Joe Girardi says to dig a hole and dump the liquid in it. He says the barrels are beautiful and heavy duty. Lionel Roy is person to contact at W.R. Grace."

Mr. Dooley divulged the information to The Transcript yesterday upon learning of the possible violations.

Plant manager Thomas O. Gavin today emphatically denied reports that W.R. Grace ever considered entering into an agreement with Readsboro.

"There's no truth to that at all, and I say that very affirmatively," Mr. Gavin told The Transcript.

"It's a complete surprise to me. To the best of my knowledge, I know nothing of the situation," he said.

Mr. Gavin said North Adams was the only party ever involved in plans for disposing the material.

Mr. Roy said he had been approached by members of the Readsboro highway department regarding the availability of the barrels.

"I told them that we did have some at the plant containing a combination of chemicals and water which would have to be properly and legally disposed of. After they contacted me, I never heard anything more and the issue died down," he said.

The controversy came to light this week after a worker from the company called the North Adams Fire Department to complain about a possible fire hazard in the dumping. Chief Albert P. Denelli said the informant listed the contents of the barrels as including a flammable solvent, toluene. Transporting and disposing of it require a license from the state.

State regulations also require a permit before any liquid or chemical waste is disposed of in a municipal landfill. The city's own regulations prohibit chemical or liquid wastes.

Readsboro selectmen had no immediate reaction to the incident.

"What can we really say? It's all pure conjecture to think about how this may have affected us if we decided to take the barrels," Selectman Alan J. Distler said.

"The whole deal sounded kind of peculiar — it just didn't sound right, considering the company didn't want to dispose of the material itself. The contents of the barrels was an important question in our minds, but we dropped the whole plan because it would have been too expensive," he said.

"The material was obviously something that they just couldn't drop in their own backyard. I think the ecology should be preserved and protected from any dangerous chemicals, and this would have been a necessary consideration if the agreement progressed any further," he said.

HARRY L. BAUER

JPC SEP 1 2 1975

Paul Calabane: —

Paul — the attached item of interest appeared in a recent issue of the Bennington, Vermont newspaper.

HB WRG/NY.

Down in Berkshire

City, W.R. Grace Co., named

NORTH ADAMS — Legal action against the City of North Adams and the W. R. Grace Co. of Adams was recommended this week by the state division of water pollution control for the illegal dumping of industrial waste at the North Adams landfill.

The illegal dumping recently came to light when a Grace employe anonymously called the city fire department and said the waste being dumped constituted a possible fire hazard.

The informant listed the contents of the barrels, which included a flammable solvent, toluene, the vapors from which can explode when the temperature is above 40 degrees Fahrenheit.

Transporting and disposing of it require a license from the state, and state landfill regulations require a permit before any liquid or chemical waste is deposited in a municipal landfill.

Regional pollution control chief William Doubleday said Thursday "We'll go through the attorney general's office on it." The Grace Co., he noted, "had full knowledge the stuff needs a licensed carrier."

Tuesday, March 2, 1976

Grace, city fined for dumping

NORTH ADAMS—W.R. Grace & Co. has agreed to pay the state $2,000 in civil penalties for its part in violating the state's hazardous waste [illegible] Atty. Gen. Francis X. Bellotti's office said today.

The City of North Adams agreed to pay $1,000 for agreeing to dump a hazardous byproduct of Grace's operations, toluene, in the city landfill. The fines were part of a consent judgment filed today in Suffolk Superior Court between the state hazardous waste board and W.R. Grace & Co. and the City of North Adams.

The fines, along with an $8,000 fine against the Worcester Spinning and Finishing Co. for failing to construct water pollution control facilities, are the first the state has levied for water pollution violations, the attorney general said.

In addition to the fines against the company and the city, the court has issued injunctions preventing the company from disposing of its hazardous wastes in violation of state regulations, and the city from accepting the wastes.

State regulations require the company, which manufactures textiles for the printing industry, to hire a licensed carrier for its hazardous wastes. According to state water pollution control officials, the company had been storing the chemical solvent toluene in barrels since it was told to stop dumping it in the Adams landfill about two years ago.

The company offered over 100 barrels to the city of North Adams in return for dumping their contents into the city landfill. City officials responsible for the dumping have denied the barrels contained toluene, which is a flammable liquid. The barrles contained mostly rain water and rags, they said.

The fines will be paid to the state's environmental fund, a spokesman from the attorney general's office said.

If the company or the city violates the injunctions, they will be in contempt of court, said Stephen Leonard, the attorney handling the case for the attorney general. The court could assess contempt penalties in the form of more fines, he said.

The Transcript. Friday February 6, 1976

City pays $1,000 fine for dumping chemical

NORTH ADAMS — The city has paid a $1,000 fine for dumping flammable chemical solvent in the city landfill, Mayor Joseph R. Bianco said today.

But he continued to deny any intentional wrongdoing by any of the city employes involved in the dumping.

W.R. Grace & Co. of Adams, the company that collected the solvents in barrels and offered them to the city in return for dumping their contents in the landfill, will pay a $2,000 fine, the mayor said.

Assistant Atty. Gen. Steven Leonard, who has been handling the case said the mayor is a "blabbermouth" who had "no business speaking until the case is settled."

He said W.R. Grace & Co. has not accepted the terms of the agreement and the suit for which the fine is the penalty has not even been filed.

Mr. Leonard did not deny the mayor's report the attorney general's office gave the city and the company a choice between the small fines or a whopping $40,000 lawsuit.

The settlement leaves undecided which city official authorized the dumping. Public works commissioner Joseph J. Girardi says he got permission from city sanitarian George L. Heisler. Mr. Heisler claims he never gave his permission.

Mayor Bianco said he and city solicitor James A. Bowes and assistant solicitor Lionel Richard agreed it is "better to pay the fine than risk a $40,000 lawsuit."

"On the other hand, we feel there was never any attempt by any person working for the city of North Adams to violate the law in any manner," Mayor Bianco said.

Thomas O. Gavin of W.R. Grace & Co. said he does "not intend to divulge details of the negotiations." The company's legal staff in Boston has been handling the case, he said.

The case stems from an incident in August when, in a deal with W.R. Grace, the city allowed over 100 barrels of waste to be dumped in the landfill. Grace has denied they contained toxic waste.

(Concluded on page 16)

City pays fine for dumping

(Continued from page 9)

State law prohibits dumping flammable chemicals in city landfills with a license, and hazardous waste laws require companies to hire licensed carriers to handle such chemicals. In addition, city landfill regulations prohibit dumping any liquid wastes and state and federal water pollution laws consider such dumping a pollution of groundwater sources.

Apparently, the city and the company agreed to fines under the penalty provisions of the water pollution laws.

City facing no charges on land fill, says Bianco

NORTH ADAMS — No criminal charges will be brought in the landfill case involving North Adams public works and health department officials and W. R. Grace & Co. of Adams, Mayor Joseph R. Bianco said today.

The state attorney general's office summoned officials from the city and the company to Boston yesterday to discuss allegations the city dumped about 100 barrels of Grace's toxic industrial waste in the city landfill.

A spokesman for the attorney general's office said today no resolution was reached at the conference, but said, "The ball is in their court."

"We are interested in reaching a resolution without going to court if possible. We laid out alternatives for them and it's up to them to act," said the spokesman.

Mayor Bianco said the city and the company may be subject to civil action and a "minimal" fine for the dumping. He said he is waiting for a letter from the assistant attorney general summarizing the instructions before he takes a position in the case.

Mayor Bianco did not attend the conference. Assistant city solicitor Lionel J. Richard represented the city. City sanitarian George L. Heisler, public works commissioner Joseph J. Girardi and W. R. Grace plant foreman Thomas Gavin attended the meeting. Grace's counsel from Boston also attended the meeting.

The Transcript, Friday, December 26, 1975

New evidence alleged in Grace dumping

NORTH ADAMS—Joseph J. Girardi says a mystery witness and new evidence will clear him of charges that he dumped toxic industrial waste in the city's landfill last August.

The attorney general's office has scheduled a conference in Boston on the case Jan. 13, and the public works commissioiner said today, "I'm going down there loaded."

"When I have to use the stuff, I will," he said of letters and testimony from a witness. He refused to discuss either, except to say that the witness works for W.R. Grace Co. in Adams.

In exchange for 190 free barrels, Mr. Girardi took waste from the Adams firm and ordered it to be dumped at the city's landfill. He maintains he had approval from George L. Heisler, city sanitarian, but Mr. Heisler denies that.

Early in September, William R. Doubleday, regional director of the state Division of Water Pollution Control, said he would ask state lawyers to press legal charges against the city and the company.

He said the dumping involved hazardous chemicals which require dumping permits and shipping by licensed carriers. Either violation carries a possible penalty of $5,000 in fines or six months in jail. However, state officials said they could not remember any prosecutions under the law.

Mayor Joseph R. Bianco said today that he may attend the conference in the attorney general's office Jan. 13, if his schedule permits. He also has asked Lionel J. Richard to attend the conference as assistant city solicitor, representing the city.

Mr. Girardi, however, said he had invited Mr. Richard to come to Boston with him, and there was some confusion today about whether Mr. Richard would go to Boston as Mr. Girardi's legal counsel.

Today, Mr. Richard said his original understanding — that he would represent Mr. Girardi as counsel — was incorrect and that he would simply attend the conference "to get the facts."

Mr. Heisler also received an invitation to the conference but he said today that he has been on vacation all week and has not picked up his mail. He had not seen the letter from Boston, he said.

As plant manager for the Grace firm, Thomas O. Gavin also has been invited. He will attend, he said. Mr. Girardi said he will ask Lionel R. Roy, another Grace employe, to go with him to Boston.

Mr. Roy — with whom the commissioner worked out details of the barrel-waste exchange — is not the unidentified witness, Mr. Girardi said. The witness can prove that he did no wrong, the commissioiner said, and that charges of wrongdoing have been made irresponsibly by at least one person with "an axe to grind against the company."

The stories told by Mr. Girardi and Mr. Heisler differ sharply, except on the basic facts that a deal was made: The city would accept the waste in exchange for the barrels which Mr. Girardi wanted for sand storage during the winter.

He said again today that getting the free barrels was his only aim and that he had "the best interests of the city" in mind. When the dumping took place, he argued that Mr. Heisler had given approval to accepting the waste at the landfill.

Mr. Heisler denies this, saying that he told Mr. Girardi the city's health board would never allow the industrial waste from the Adams firm to be dumped in North Adams. Although Mr. Girardi's department runs the landfill's daily operations, regulations for the site originate from the health department.

When Mr. Doubleday made his own investigation of the dumping, he heard three different versions of what happened, he said. He said both the city and the company knew some of the waste was toluene or other hazardous chemicals that are covered by state regulations on waste disposal.

The Jan. 13 conference was called for 2 p.m. by Charles Corkin, an attorney within the environmental division of the attorney general's office. He could not be reached today for comment.

The Transcript, Monday, November 3, 1975

State taking city, Grace to court

By PATRICIA S. PERKINS

NORTH ADAMS — The attorney general's office said today it will prosecute W. R. Grace & Co. and the City of North Adams for allegedly dumping a flammable chemical in the city landfill.

State law prohibits dumping flammable chemicals in city landfills without a license, and hazardous waste laws require companies to hire licensed carriers to handle such chemicals. In addition, city landfill regulations prohibit dumping any liquid wastes, and state and federal water pollution laws consider such dumping a pollution of ground water sources.

Asked what the attorney general's decision to take the case means, regional water pollution control chief William Doubleday said, "It means they're going to prosecute the hell out of them."

Thomas Gavin, plant manager at W. R. Grace & Co., said today he has no statement to make, either on whether the company has hired lawyers, or whether the liquid dumped in the landfill did contain a flammable chemical.

Mayor Joseph R. Bianco said today he is "a little bit surprised" about the attorney general's decision. He said he has heard nothing about the case since September, when the regional office of water pollution control was conducting its investigation.

The case has apparently generated some political interest. Division of water pollution control officials said "a state legislator" and deputy commissioner Frederick Markey of the Dept. of Commerce and Development called to inquire about the status of the case. Mr. Markey was unavailable for comment today.

"I don't like that at all. We are just doing our job and it annoys me to be boxed by other state agencies," said John O'Brien, a water pollution control lawyer working on the case.

The case stems from the August dumping of some liquid from over 100 barrels from W. R. Grace & Co. at the North Adams landfill.

The contents of the barrels have been a matter of debate between the division of water pollution control, which says some of the barrels contained a flammable liquid, violating state water pollution, landfill and hazardous waste laws, and city and company officials, who claim the barrels contained "mostly rainwater" and rags.

Stories about just who gave permission for the dumping differ. In fact, one state sanitary engineer says he got "three different stories" about the authorization. City sanitarian George Heisler and public works commission Joseph Girardi have blamed each other for the authorization.

In Boston, Mr. O'Brien said today the attorney general's office must decide whether to pursue the case as a criminal or civil matter. Standards of proof are more stringent in a criminal case.

Violation of hazardous waste laws, a criminal matter, could bring fines of up to $5,000 or six months in jail or both. Landfill violations carry fines between $100 and $500, Mr. O'Brien said. Violations of the Clean Waters Act could bring fines of up to $25,000 or a year in jail or both, he said.

The water pollution division has brought no criminal charges in over seven years, Mr. O'Brien said.

Water pollution officials said prosecution in this case is important "to establish the division's credibility in western Massachusetts.

"The people in that part of the state complain they are alienated from Boston. But they sometimes use the distance to thumb their noses at state regulations," said one official.

The attorney general's office has been reviewing the evidence in the case for the past two weeks. The attorney general had the discretion to accept or reject the case, state officials said.

The decision to take on the case came Friday, said a spokesman from the attorney general's office.

Girardi denies role in dumping of chemicals

By MICHAEL W. MUNLEY

NORTH ADAMS—Joseph J. Girardi calls himself "completely innocent" of allowing dangerous chemicals last month into the North Adams landfill.

In a letter to the health board, the commissioner of public works says neither was the waste material dangerous, nor did he bypass the board in taking the waste from W.R. Grace & Co. of Adams.

Stephen M. Long Jr., health board member, read the letter over the telephone today but refused to say what the board might do about it. "That would be presumptuous on my part," he said.

In almost every respect, Mr. Girardi's version of the dumping issue differs completely from the version of George L. Heisler, sanitarian, who repeated his story in an interview today.

Also today, state water pollution control officials in Amherst prepared their summary of findings and said they would be mailed today to central offices in Boston for a decision on what to do about the case.

Joseph J. Dupuis, sanitary engineer, feels state law was broken not only by the Grace firm — for not using a licensed shipper to move the waste — but by the city, in receiving it without a special permit. Penalties include a $5,000-fine or six months in jail, or both.

Mr. Girardi's letter to the health board yesterday said Mr. Heisler left the whole issue up to him but on July 31 Mr. Girardi wrote a letter to the Grace Co. saying he had Mr. Heisler's approval for the health board.

The permission "was verbal and very vague," said the letter to Grace officials from Mr. Girardi, but it allowed liquid waste to be dumped, although solid waste would be prohibited.

A copy of that letter is in the hands of Mr. Dupuis who read it over the telephone today from his Amherst office. He said it confirms Mr. Girardi's role in allowing the Adams firm to dump its waste in North Adams.

Mr. Heisler said today he is certain of everything about his version except when Mr. Girardi first approached him about the Grace company's waste. Mr. Heisler said it was late June but Mr. Girardi's letter says mid-July.

He took Mr. Heisler to the company's plant in Adams, said Mr. Girardi, for a look at the waste and a talk with the company's chemist. Then, he said, Mr. Heisler promised to seek health board approval and inform the company by letter about dumping the waste in North Adams.

Mr. Heisler confirmed he visited the plant but was not asked there about approval and never made any commitment to inform the company, verbally or by letter.

He said Mr. Girardi stopped him twice at city hall and asked whether he thought the health board would approve the dumping. "They can't, Joe," Mr. Heisler says he replied, citing the local regulations he helped write that prohibit liquid material from being dumped at the landfill.

But Mr. Girardi says that Mr. Heisler threw the whole matter in his lap, telling him the landfill budget comes within his jurisdiction as public works commissioner.

The whole operation, says Mr. Girardi's letter, saved the city $980.

He has maintained during the last month that his single aim was to dump the Grace waste and get 190 free barrels from the company in a trade. He plans to use the barrels for winter sand storage along city streets and highways.

He is sorry now that he ever wrote the letter to the health board, he said today, because he wrote it in anger and frustration. His letter says the board has accused him and found him guilty without a fair trial.

"Boards such as yours and many others are a waste of time," says the Girardi letter, addressed to Dr. Edmond

Girardi denies allowing chemicals at city landfill

(Continued from page 13)

P. Larkin, public health officer, with copies to the health board, Grace officials and Mayor Joseph R. Bianco.

In the letter, and again in an interview today, Mr. Girardi contended that none of the material he reviewed for dumping at the landfill was dangerous. It was all either water or rubbish, like rags, he said.

He calls himself "falsely accused," and "completely innocent" of this charge: allowing hazardous waste into the landfill.

Girardi refuses comment on waste dumping

NORTH ADAMS—Joseph J. Girardi ngrily refused comment today on his ole in last month's dumping of azardous waste at the city's landfill.

The commissioner of public works has ffered before a version of the dumping - which state officials say was illegal in wo ways — that differs sharply from hat of George L. Heisler, sanitarian, rho stood by his account today.

Mayor Joseph R. Bianco says he does ot know which version to believe — "There's only three people around city all I can really trust" — and refuses "to et involved after the fact."

He admitted today, however, that he elephoned state officials in Amherst last eek to complain about their nvestigation into the dumping of waste rom W.R. Grace & Co. in Adams.

He called not to interfere with the nvestigation, he said, but to complain bout long distance information athering, from one person involved and hen another.

"I told them that if they want to come p here and air the whole thing, they can et everybody — even the Grace people – at one table in this office," he said.

"I've had confusing stories about this nyself," said the mayor as he insisted, "The proper way to conduct an nvestigation is to get all the principals in ne room together. When all the rincipals are around a table and a tatement is made, someone can hallenge it."

Mr. Girardi told The Transcript in ugust that two months before he had eceived an offer from the Adams firm of 90 free barrels if he dumped their contents at the North Adams landfill. Mr. Heisler approved the deal at that time, e said.

he refused from the first to take part in the dumping, which requires approval from the local health board. As industrial waste, the material also required two kinds of state approval before being dumped.

After the dumping, when the health board learned of it, Mr. Girardi admitted that Mr. Heisler "didn't want to say yes or no. He told me to make the decision, so I wrote to the company we would take only trash and the liquid waste, not the barrels with black gooey stuff in them."

He says that after the material was buried two weeks ago, Mr. Heisler came to him and said, "There's a possibility there may be trouble over this," and then handed him local regulations that forbid dumping liquid waste at the landfill.

The health board plans no further investigation of the dumping. Stephen M. Long Jr., a board member, says that fixing the blame now could serve no real purpose. Dr. Arthur L. Mazzu, chairman, says he was not informed about the issue ahead of time but that "I don't think there was any hanky panky or intention to do wrong."

However, William R. Doubleday, director of regional water pollution control, said last week he will recommend legal action against the Grace company for failing to have a licensed carrier transport the waste to North Adams.

There will also be action against the city of North Adams, he said, for receiving at the landfill the hazardous wastes contained in the barrels. Possibly 100 or 125 of the 190 barrels contained what state law calls hazardous waste, his office said.

Joseph J. Dupuis, a sanitary engineer who said the law provides for punishment of up to $5,000 or six months uncertain the attorney general's office will act to enforce the two-year-old regulations.

"As far as I know, no one has been prosecuted for this previously. If there were action, I assume it will be the first. Enforcement has been vague so far," he said.

Rejected because of cost

Chemical barrels offered to Readsboro, too

By MARK E. VOGLER

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Mr. Girardi was unavailable for comment today. His office reported that he was out of town on a business assignment.

And a Grace official denied the Readsboro, report.

"Mr. Grardi was just trying to be helpful to small towns in finding out where they could get barrels for free. Selectmen had asked me to find out what was in the barrles. They rejected the idea because of the heavy transportation costs," Mr. Dooley said.

"I never found out what the material inside the barrels was, but was told that it was flammable. They told us we should dig a ditch and dump the stuff to take care of it," he said.

In a confidential note to selectmen last month, Mr. Dooley wrote, "I have discussed situation with Joe Girardi, North Adams Pub. Works Commissioner. He found a place that will give us barrels for free. W.R. Grace Co. on Harmony St. will give us barrels and load them for us on Friday August 15 at 10 a.m. The barrels contain a liquid that we must dump.

"Joe Girardi says to dig a hole and dump the liquid in it. He says the barrels are beautiful and heavy duty. Lionel Roy is person to contact at W.R. Grace."

Mr. Dooley divulged the information to The Transcript yesterday upon learning of the possible violations.

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"There's no truth to that at all, and I say that very affirmatively," Mr. Gavin told The Transcript.

"It's a complete surprise to me. To the best of my knowledge, I know nothing of the situation," he said.

Mr. Gavin said North Adams was the only party ever involved in plans for disposing the material.

Mr. Roy said he had been approached by members of the Readsboro highway department regarding the availability of the barrels.

"I told them that we did have some at the plant containing a combination of chemicals and water which would have to be properly and legally disposed of. After they contacted me, I never heard anything more and the issue died down," he said.

The controversy came to light this week after a worker from the company called the North Adams Fire Department to complain about a possible fire hazard in the dumping. Chief Albert P. Denelli said the informant listed the contents of the barrels as including a flammable solvent, toluene. Transporting and disposing of it require a license from the state.

State regulations also require a permit before any liquid or chemical waste is disposed of in a municipal landfill. The city's own regulations prohibit chemical or liquid wastes.

Readsboro selectmen had no immediate reaction to the incident.

"What can we really say? It's all pure conjecture to think about how this may have affected us if we decided to take the barrels," Selectman Alan J. Distler said.

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"The material was obviously something that they just couldn't drop in their own backyard. I think the ecology should be preserved and protected from any dangerous chemicals, and this would have been a necessary consideration if the agreement progressed any further," he said.

Thursday, September 4, 1975

City, Grace in hot water over dumping of chemical

By PATRICIA S. PERKINS

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Mr. Dupuis said company officials said their industrial waste is not toluene, but propylenetrichloride. But state hazardous waste control officials said that solvent is also covered by state regulations and must be trucked by licensed carriers.

The number of barrels of volatile waste taken out by Silresin — over 100 — and the number dumped in the landfill "are in the same ballpark," Mr. Dupuis said.

"Unless they've changed their process, you can figure some of the dumped barrels contained toluene," said Mr. Dupuis.

Mr. Dupuis said when he visited the Grace Company in December 1973, the company was stockpiling waste in barrels. He gave company officials a list of licensed hazardous waste carriers then, he said.

Local and company officials have stressed the barrles contained mostly rainwater. But toluene is too flammable to be left in open drums to collect rainwater, Mr. Dupuis said.

"I'd be surprised if the fire marshal allowed them to store it in the open," he said.

Mr. Dupuis said he asked city public works commissioner Joseph J. Girardi, "Don't you know what is supposed to go in a landfill?" He said Mr. Girardi replied the health board controls landfill regulations.

Mr. Dupuis said he had "three different stories" about how the authorization for the dumping came about.

Conference with Grace Co. [illegible]

State investigating dumping of chemicals

NORTH ADAMS—The state division of water pollution control is investigating the dumping of waste material in the North Adams landfill.

Joseph Dupuis, sanitary engineer with the water pollution control division, said he will be in Adams today to talk with officials at W. R. Grace Co. about where the firm's toxic wastes have been going.

Almost two weeks ago, under an agreement between public works commissioner Joseph Girardi and the company, about 100 barrels containing rags, rainwater and some "solvent-based material" were dumped in the landfill. The dumping was in violation of local landfill regulations, as well as state public health regulations.

State law mandates that all hazardous wastes be transported by licensed carriers. Any dumping of chemicals into the landfill needs state water pollution and environmental engineering approval, said state officials from both offices today.

Glen Gilmore, sanitary engineer in the Boston environmental health office, said today the state does not issue permits to dump solvent-based materials into landfills.

Labels on two barrels indicated two substances, one an explosive, toxic solvent bonding agent Thoxin, and the other a relatively harmless water-based latex.

Thomas O. Gavin, plant manager at W.R. Grace said today none of the barrels contained Thoxin. He said the company uses all the Thoxin it receives, but uses the barrels to store discarded rags and other company produced waste.

Mr. Dupuis said he talked the W.R. Grace Co. in December 1973. He said the company had been stockpiling its toxic wastes in barrels. He said he gave the company manager a list of licensed carriers of toxic waste.

Mr. Gavin said the company disposes of its toxic waste through licensed carriers. When asked which carriers, he said, "A number of those authorized."

Although North Adams landfill regulations prohibit any chemical or liquid waste disposal, the waste liquid was dumped about two weeks ago, Mr. Gavin said he has a letter of authorization from Mr. Girardi.

Mr. Girardi said city sanitarian George Heisler approved the dumping, but Mr. Heisler has denied giving any such approval. Board of health members, who by state law must issue a permit for industrial waste disposal in the landfill, were not notified until after the waste was already buried.

Mr. Dupuis said if the barrels contained any hazardous material, W.R.Grace "would be in trouble." He also said the state division of water pollution control will want to know why the dumping was permitted.

"We are concerned about two things, pollution of the ground water supply and the possibility of explosion or fire," said another state sanitary engineer, Peter P. Mokrzesky of the department of public health.

Mr. Dupuis said, however, he is not sure what action the state will take nor what penalties can be imposed on the city or company.

Girardi says city swaps dumping space for barrels

NORTH ADAMS—Joseph J. Girardi, public works commissioner, said today the city gave some dumping space to an Adams firm but got 190 free barrels in return.

"That's five years worth of free barrels," said the commissioner who will use them to store sand on city streets during the winter. "It was beautiful. Nothing to it," he said.

The barrels came from W.R. Grace & Co., the textile manufacturer, which a week ago dumped 190 barrels of rags, rubbish and liquid waste at the North Adams landfill.

"If it wouldn't flow, I wouldn't take it," said Mr. Girardi, explaining that the company had his approval to dump the waste in North Adams. Some residents got excited about the deal, he said, and he knows why.

Mr. Girardi said the man who started complaints about the dumping is the city's usual barrel supplier. "He picks them up for nothing and sells them to us for $5.50, or so," said Mr. Girardi.

But there were no grounds for complaint, he said, refusing to name the man he suspects of making the first complaint. Mr. Girardi said he had an agreement from George Heisler, city sanitarian that the rubbish was not harmful.

F

City of

COMMISSIONER OF PUPLIC WORKS
JOSEPH J. GIRARDI

NORTH ADAMS
MASSACHUSETTS

July 31, 1975

Mr. Lionel Roy
W. R. Grace Company
Harmony Street
Adams, Massachusetts 01220

Dear Mr. Roy:

I have presented your question on the disposal of your containers to the Board of Health. The answer I received was verbal and very vague.

I was informed by Mr. Heisler that it was favorable to dispose of the liquid containers but not the solid waste.

It was his contention that underground fires would be fed by this by-product and would be dangerous.

I was also informed by Mr. Heisler that I could have the authority to make a suitable location to receive the barrels of waste and liquid and dispose of them as I see fit.

This letter is to inform you that I will accept the barrels that contain liquid and those that have rubbish, but you will have to dispose of the solid type elsewhere.

I must insist that you call this office one day before you dispose of the above items so that I can make the necessary arrangements for disposal at our Landfill Area.

Yours truly,

Joseph J. Girardi

Joseph J. Girardi
COMMISSIONER OF PUBLIC WORKS

JJG/r

1st consignment made to
[illegible] at the
[illegible]
Thursday [illegible]

City of

COMMISSIONER OF PUPLIC WORKS
JOSEPH J. GIRARDI

NORTH ADAMS
MASSACHUSETTS

September 8, 1975

Edmond P. Larkin, M.D.
Director of Health
Health Department
City Hall
10 Main Street
North Adams, Massachusetts 01247

Dear Dr. Larkin:

I have before me your letter pertaining to the dumping of the chemicals at the Landfill.

I must confess that I am convinced that boards such as yours and many others are a waste of time and effort. I am being accused and called guilty before you have even given me a chance to defend myself.

I would like to set the record in order to inform you of some facts.

In July, the Grace Co. called to ask if we were interested in obtaining some metal barrels. I visited the plant and examined the contents. I was aware that I should notify your Board, therefore, I notified Mr. Heisler to meet with the Grace Co. chemist. Mr. Heisler could not be available then, so we met at a later date of July 15. Mr. Roy, Mr. Gavin, Mr. Heisler, and myself examined the materials. I tried to burn the materials and we concluded that Mr. Heisler would bring it to the Board for confirmation as to "yes" or "no". He was to send a letter to Mr. Gavin of the Grace Co.

I approached Mr. Heisler for 2 weeks for an answer because the Grace people were waiting for an answer. I was finally told that I had the authority, since the landfill was in my budget. I then wrote to the Grace Co. to accept certain type materials. I am enclosing a copy of the letter that I sent to them. This was completed and I saved $980.00 for the City.

If you can find time, please call Chief Benelli. I am sure he can enlighten you on your adjectives as to me dumping hazardous, dangerous, and harmful materials at the Landfill Area.

Doctor, if you were not notified, I can assure you with proof that I am completely innocent of this charge and all you needed was a phone call to my office!

If I made a mistake, I will stand up and take the blame, but when I am accused falsely, I will fight to prove otherwise.

Yours truly,

Joseph J. Girardi

Joseph J. Girardi
COMMISSIONER OF PUBLIC WORKS

JJG/r
Enclosure
cc: Mayor Joseph R. Bianco
Mr. Gavin, Grace Co.
Mr. Roy, Grace Co.
Board of Health Members

July 31, 1975

Mr. Lionel Roy
W. R. Grace Company
Harmony Street
Adams, Massachusetts 01220

Dear Mr. Roy:

I have presented your question on the disposal of your containers to the Board of Health. The answer I received was verbal and very vague.

I was informed by Mr. Heisler that it was favorable to dispose of the liquid containers but not the solid waste.

It was his contention that underground fires would be fed by this by-product and would be dangerous.

I was also informed by Mr. Heisler that I could have the authority to make a suitable location to receive the barrels of waste and liquid and dispose of them as I see fit.

This letter is to inform you that I will accept the barrels that contain liquid and those that have rubbish, but you will have to dispose of the solid type elsewhere.

I must insist that you call this office one day before you dispose of the above items so that I can make the necessary arrangements for disposal at our Landfill Area.

Yours truly,

Joseph J. Girardi
COMMISSIONER OF PUBLIC WORKS

JJG/r

copy in file 12/24

THE COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF THE ATTORNEY GENERAL
JOHN W. Mc CORMACK STATE OFFICE BUILDING
ONE ASHBURTON PLACE, BOSTON 02108

copy also to E- OK

T 1/9

FRANCIS X. BELLOTTI
ATTORNEY GENERAL

December 17, 1975

Mr. Thomas Gavin
Manager
W.R. Grace Company
Adams, Massachusetts

Dear Mr. Gavin:

You are requested to appear at a conference in this office on Tuesday, January 13, 1976, at 2:00 p.m. to discuss an incident in which, it is alleged, drums of hazardous material belonging to the W.R. Grace Company of Adams were deposited on the Adams Landfill. You may be accompanied by counsel if you wish.

Mr. Girardi, Commissioner of Public Works, and Mr. Heisler, Sanitarian of North Adams, are receiving similar invitations.

Very truly yours,

Charles Corkin II
Chief
Environmental Protection Division
131 Tremont Street, Room 800
Boston, Massachusetts 02111
(617) 727-2265

CCII:SML:dap

RECEIVED
DEC 24 1975
GRACE -- ADAMS

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS. CIVIL ACTION NO.

HAZARDOUS WASTE BOARD, Plaintiff v. W. R. GRACE & CO. and CITY OF NORTH ADAMS Defendants	JUDGMENT

Now come the plaintiff and the defendant W. R. Grace & Co., and hereby agree that for the purposes of settlement and without any admission or denial by Grace of the allegations made in the Complaint, that the following judgment shall enter:

A. The defendant Grace, its agents, employees and assigns is permanently enjoined from disposing of any hazardous wastes as such term is defined by Regulation 4.2 of the Hazardous Waste Regulations promulgated by the Commonwealth of Massachusetts Hazardous Waste Board, resulting from the industrial processes of Grace's plant located in the Town of Adams in violation of said Regulations.

B. The defendant Grace shall pay a civil penalty of two thousand dollars ($2000) to the Commonwealth of Massachusetts, which sum will be deposited in the Environmental Fund established

by Mass. Gen. Laws c. 21A, §10.

HAZARDOUS WASTE BOARD

By its attorneys,

CHARLES CORKIN II, Chief
Environmental Protection Division

STEPHEN M. LEONARD
Assistant Attorney General
Environmental Protection Division
131 Tremont Street
Boston, Massachusetts 02111
(617) 727-2265

W. R. GRACE & CO.

By its attorney,

ALLAN R. CAMPBELL

By the court (,J.)

Entered: _____

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS. CIVIL ACTION NO.

HAZARDOUS WASTE BOARD, Plaintiff v. W. R. GRACE COMPANY and CITY OF NORTH ADAMS, Defendants	COMPLAINT

1. This action seeks to enjoin the further illegal disposal of hazardous wastes within the Commonwealth by the defendants and to recover damages for an instance of such dumping.

2. The plaintiff is the Hazardous Waste Board of the Commonwealth of Massachusetts, having a principal place of business at 100 Cambridge Street in Boston, Suffolk County.

3. The defendant W. R. Grace Company is a corporation duly organized under the laws of the State of Connecticut and having its Massachusetts headquarters at 62 Whittemore Street in Cambridge, Middlesex County.

4. The defendant City of North Adams is a municipal corporation duly organized and existing under the laws of the Commonwealth, with a regular place of business at City Hall in North Adams, Berkshire County.

5. Mass. Gen. Laws c. 21, §57, establishes a board to regulate the handling and disposal of hazardous solid wastes (hereinafter "the Board"), and provides that one of the Board's member agencies shall be empowered to enforce regulations promulgated pursuant to the statute; the Division of Water Pollution Control has assumed this authority. Section 57 further provides that the Board shall, after a public hearing, adopt rules and regulations -- [inter alia]

> (1) identifying substances which, because of their chemical, radioactive, flammable, explosive or other characteristics, constitute or may reasonably be expected to constitute a danger to the public health, safety or welfare or to the environment and which should be handled and disposed of only by licensed hazardous waste disposers...
>
> (2) specifying in what manner said wastes may be handled or disposed of....

6. Acting pursuant to this grant of authority, the Board, on January 11, 1973, promulgated "Hazardous Waste Regulations" (hereinafter "the regulations").

7. Regulation 4.2 classifies solvents and clorinated oils as hazardous wastes within the meaning of the regulations.

8. Regulation 3.1 provides that no person shall move hazardous wastes to a disposal site without having obtained a license so to do from the Division of Water Pollution Control.

9. Regulation 3.2 provides that no person shall maintain a land site for the disposal of hazardous wastes without first having secured the approval of the Division of Water Pollution Control.

10. Regulation 3.3 provides that no person shall dispose of hazardous waste at a land site unless the site has been approved by the Division of Water Pollution Control.

11. Mass. Gen. Laws c. 21, §46, provides:

> The attorney general may, upon request of the director, [of the Division of Water Pollution Control] bring action for injunctive relief against any person violating a provision of this chapter, or of any permit, order, regulation or determination issued thereunder, and the superior court in equity shall have jurisdiction to enjoin such violation and to grant such further relief as it may deem appropriate.

12. Mass. Gen. Laws c. 21, §42, provides:

> That any person who violates any provision of this chapter, any valid regulation, order or permit prescribed or issued by the director [of the Division of Water Pollution Control] thereunder...shall be subject to a civil penalty not to exceed ten thousand dollars per day of such violation, which may be assessed in an action brought on behalf of the Commonwealth in any court of competent jurisdiction.

13. The defendant City operates a municipal landfill, which facility has not been approved as a site for the disposal of hazardous wastes.

14. As a by-product of the industrial processes of its plant located in the Town of Adams, the defendant Grace Company produces toluene, a hazardous waste as defined by regulation 4.2.

15. In February of 1974, the defendant Grace Company, through its Adams Plant Manager, was informed by the Division of Water Pollution Control of the effect of the regulations on its operations and of the necessity that its hazardous wastes be disposed of by a licensed handler; this information was reiterated in a letter dated March 14, 1974.

16. Subsequent to the above contacts, the defendant Grace Company accumulated its hazardous wastes at the site of the Adams plant; the wastes were periodically removed by a licensed carrier.

17. In August of 1975, employees at the defendant Grace's Adams plant and officials of the defendant City agreed that the City would accept drums containing the waste products of the plant (which waste products included toluene), would dispose of the contents of the drums at the City's landfill and would keep the drums.

18. The hauling of the barrels and their dumping at the landfill began on or about August 7, 1975, and continued for four days.

WHEREFORE, the plaintiff prays:

A. That a permanent injunction issue forbidding the defendant Grace Company, its agents, employees or assigns from disposing of hazardous wastes in violation of the Hazardous Waste Regulations.

B. That a permanent injunction issue forbidding the defendant City of North Adams, acting through its officials and employees, from accepting for disposal or disposing of any hazardous wastes in violation of the Hazardous Waste Regulations.

C. That the court assess a civil penalty against the defendant Grace Company in such amount as is appropriate, said penalty to be paid into the Environmental Fund established by Mass. Gen. Laws c. 21A, §10.

D. That the court assess a civil penalty against the defendant City of North Adams in such amount as is appropriate, said penalty

to be paid into the Environmental Fund established by Mass. Gen. Laws c. 21A, §10.

Respectfully submitted,

FRANCIS X. BELLOTTI
Attorney General

CHARLES CORKIN II, Chief
Environmental Protection Division

STEPHEN M. LEONARD
Assistant Attorney General
Environmental Protection Division
131 Tremont Street
Boston, Massachusetts 02111
(617) 727-2265

F

W. R. GRACE & CO.
INDUSTRIAL CHEMICALS GROUP
62 WHITTEMORE AVE.-CAMBRIDGE, MASS 02140

February 17, 1976

Stephen M. Leonard, Esq.
Assistant Attorney General
Environmental Protection Division
131 Tremont Street, Room 800
Boston, Massachusetts 02111

Re: Hazardous Waste Board vs.
W. R. Grace & Co., and
City of North Adams

Dear Mr. Leonard:

Enclosed herewith is the original of a consent judgment in the above-referenced matter which contains the terms we had discussed. Said judgment has been signed by me on behalf of W. R. Grace & Co.

Also enclosed is a check in the amount of $2000 made payable to the "Commonwealth of Massachusetts Environmental Fund" in payment of the civil penalty as stated in the consent judgment. I would appreciate it if you would advise me by telephone when the complaint and judgment are filed in this matter. I may be reached here in Cambridge at 876-1400 ext 584.

Very truly yours,

Allan R. Campbell
Assistant Counsel

ARC:sel

bcc: T. O. Gavin ✓
E. S. Wood

To: D. Kronenburg Subj: Adams

Fr. T.O. Gavin

Adams Plant Waste disposal

Dates	Hauler
up to 9/70	Plant had its own truck & waste of carried to Adams landfill by Company personnel
9/70 — 6/73?	Waste was hauled by J. Dawson trucking to Adams landfill.
1973 1974	R. Randall removal max. 300 drum to Chesire Some 250 drums of waste was disposed of at N. Adams landfill: Grace and City of N. Adams were cited & [redacted] fined
1974-76	Waste was removed by Solvent Recovery Sys. of New England which were based in Southington Conn.
1976—	A series of different certified haulers removed material. R. Tower coordinated some of this.

DEQE/WESTERN REGIONAL OFFICE

CONFERENCE/MEETING

REGISTER

Subject: N. ADAMS LF

Date 1/16/90

Time 10 –

Program holding meeting BWSC

Person conducting meeting SFJ/AW

Attendee	Representing	Title
David Kraniewicz	W. R. Grace + Co	Mgr. of Env. Affairs
Rod McLaren	"	Assistant Env. Counsel
Al duPont	Sprague Electric	VP, General Counsel
Richard Nasman	O'Brien & Gere	Project Engineer
413-663-6583 → Fred R. Holmes	city of North Adams	administrative officer
Stephen F. Joyce	DEP	REE
Alan Weinberg	DEP	EA/BWSC

Form 114A
3/18/88

COMPLETE THIS FORM FOR EACH FIRM OR INDEPENDENT CONTRACTOR (INCLUDING YOUR OWN COMPANY, ITS AFFILIATES & SUBSIDIARIES) WHO REMOVED PROCESS WASTE FROM THIS FACILITY SINCE 1950 AND TOOK IT TO AN UNKNOWN LOCATION

(DO NOT USE)

Company Name: W. R. Grace & Co., Polyfibron Division
Facility Name: GPP/Adams
Name of Hauling Firm/Contractor: Solvent Recovery Service of New England, Inc.
Address: (no.) (street) Lazy Lane
(city) Southington (state) CT (zip code) 06489

1. Year first used 19 7 6 (10-11)
2. Year last used (enter "79" if still in use) 19 7 9 (12-13)
3. Total amount of process waste hauled from this facility:
   USE TONS ONLY IF POSSIBLE- Right justify response
   thousand gallons ..... (14-21)
   hundred tons 1 (22-28)
   thousand cubic yards ..... (29-36)
4. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know):
   FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(37)
pickling liquor	2	(38)
metal plating waste	2	(39)
circuit etchings	2	(40)
inorganic acid manufacture	2	(41)
organic acid manufacture	2	(42)
Base solutions, with pH>12	2	(43)
caustic soda manufacture	2	(44)
nylon and similar polymer generation	2	(45)
scrubber residual	2	(46)
Heavy metals & trace metals (bonded organically & inorganically)	2	(47)
arsenic, selenium, antimony	2	(48)
mercury	2	(49)
iron, manganese, magnesium	2	(50)
zinc, cadmium, copper, chromium (trivalent)	2	(51)
chromium (hexavalent)	2	(52)
lead	2	(53)
Radioactive residues, >3 pico curies/liter	2	(54)
uranium residuals & residuals for UF_6 recycling	2	(55)
lathanide series elements and rare earth salts	2	(56)
phosphate slag	2	(57)
thorium	2	(58)
radium	2	(59)
other alpha, beta & gamma emitters	2	(60)
Organics	2	(61)
pesticides & intermediates	2	(62)
herbicides & intermediates	2	(63)
fungicides & intermediates	2	(64)
rodenticides & intermediates	2	(65)
halogenated aliphatics	2	(66)
halogenated aromatics	2	(67)
acrylates & latex emulsions	1	(68)
PCB/PBB's	2	(69)
amides, amines, imides	2	(70)
plastizers	1	(71)
resins	1	(72)
elastomers	1	(73)
solvents polar (except water)	1	(74)
carbontetrachloride	2	(75)
trichloroethylene	2	(76)
other solvents nonpolar	1	(77)
solvents halogenated aliphatic	1	(78)
solvents halogenated aromatic	2	(79)
oils and oil sludges	2	(10)
esters and ethers	2	(11)
alcohols	1	(12)
ketones & aldehydes	1	(13)
dioxins	2	(14)
Inorganics	2	(15)
salts	2	(16)
mercaptans	2	(17)
Misc.	2	(18)
pharmaceutical wastes	2	(19)
paints & pigments	2	(20)
catalysts (eg. vanadium, platinum, palladium)	2	(21)
asbestos	2	(22)
shock sensitive wastes (eg. nitrated toluenes)	2	
air water reactive wastes (eg. P_4, aluminum chloride)	2	

...ATOR, ITS AFFILIATES & SUBSIDIARIES) WHO REMOVED PROCESS WASTE FROM THIS FACILITY SINCE 1950 AND TOOK IT TO AN UNKNOWN LOCATION

(DO NOT USE)

Company Name: W. R. Grace & Co., Polyfibron Division
Facility Name: GPP/Adams
Name of Hauling Firm/Contractor: Silresim Chemical Corp.
Address: (no.) 86 (street) Tanner Street
(city) Lowell (state) MA (zip code) 01852

1. Year first used 19 7 4 (10-11)
2. Year last used (enter "79" if still in use) 19 7 4 (12-13)
3. Total amount of process waste hauled from this facility:
   USE TONS ONLY IF POSSIBLE- Right justify response
   thousand gallons ..... (14-21)
   hundred tons 0 (22-28)
   thousand cubic yards ..... (29-36)
4. Components (or characteristics) of process waste from this facility disposed at site: (1=present in waste; 2=not present in waste; 9=don't know): 16 tons
   FILL IN EVERY BLOCK SPACE

Acid solutions, with pH<3	2	(37)
pickling liquor	2	(38)
metal plating waste	2	(39)
circuit etchings	2	(40)
inorganic acid manufacture	2	(41)
organic acid manufacture	2	(42)
Base solutions, with pH>12	2	(43)
caustic soda manufacture	2	(44)
nylon and similar polymer generation	2	(45)
scrubber residual	2	(46)
Heavy metals & trace metals (bonded organically & inorganically)	2	(47)
arsenic, selenium, antimony	2	(48)
mercury	2	(49)
iron, manganese, magnesium	2	(50)
zinc, cadmium, copper, chromium (trivalent)	2	(51)
chromium (hexavalent)	2	(52)
lead	2	(53)
Radioactive residues >3 pico curies/liter	2	(54)
uranium residuals & residuals for UF_6 recycling	2	(55)
lathanide series elements and rare earth salts	2	(56)
phosphate slag	2	(57)
thorium	2	(58)
radium	2	(59)
other alpha, beta & gamma emitters	2	(60)
Organics	2	(61)
pesticides & intermediates	2	(62)
herbicides & intermediates	2	(63)
fungicides & intermediates	2	(64)
rodenticides & intermediates	2	(65)
halogenated aliphatics	2	(66)
halogenated aromatics	2	(67)
acrylates & latex emulsions	1	(68)
PCB/PBB's	2	(69)
amides, amines, imides	2	(70)
plastizers	1	(71)
resins	1	(72)
elastomers	1	(73)
solvents polar (except water)	1	(74)
carbontetrachloride	2	(75)
trichloroethylene	2	(76)
other solvents nonpolar	1	(77)
solvents halogenated aliphatic	1	(78)
solvents halogenated aromatic	2	(79) 1 8
oils and oil sludges	2	(10)
esters and ethers	2	(11)
alcohols	2	(12)
ketones & aldehydes	2	(13)
dioxins	2	(14)
Inorganics	2	(15)
salts	2	(16)
mercaptans	2	(17)
Misc.	2	(18)
pharmaceutical wastes	2	(19)
paints & pigments	2	(20)
catalysts (eg. vanadium, platinum, palladium)	2	(21)
asbestos	2	(22)
shock sensitive wastes (eg. nitrated toluenes)	2	
air water reactive wastes (eg. P_4, aluminum chloride)	2	
wastes with flash point below 100° F		

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: W. R. Grace & Co. Division/Subsidiary: Polyfibron
Facility Name: GPP
Name of Site: North Adams Sanitary Landfill
Address of Site: West Shaft Road
no. street

North Adams, Massachusetts 01247
city state zip code

Name of Owner (while used by facility): City of North Adams, Mass.
Address:
no. street

city state zip code

Current Owner (if different from above):
Address:
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership 9=don't know) ..... [3] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [2] (12)
   IF CLOSED, specify year closed ..... 19[ ] (13-14)
4. Year first used for process waste from this facility ..... 19[7 5] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7 5] (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: thousand gallons ..... [ ] (19-26)
   Right justify response hundred tons ..... [1 0] (27-33)
   thousand cubic yards ..... [ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know) 13 tons

landfill, mono industrial waste	[9]	(42)
landfill, mixed industrial waste	[9]	(43)
landfill, drummed waste	[9]	(44)
landfill, municipal refuse co-disposed	[1]	(45)
pits/ponds/lagoons	[3]	(46)
deep well injection	[3]	(47)
land farming	[3]	(48)
incineration	[3]	(49)
treatment (eg. neutralizing)	[3]	(50)
reprocessing/recycling	[3]	(51)
other (specify)	[3]	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: W. R. Grace & Co. Division/Subsidiary Polyfibron
Facility Name: GPP
Name of Site: Adams Sanitary Landfill *
Address of Site: East Road
no. street

Adams, Massachusetts 01220
city state zip code

Name of Owner (while used by facility): Town of Adams, Mass.
Address:
no. street

city state zip code

Current Owner (if different from above):
Address:
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership 9=don't know) ..... [3] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [2] (12)
   IF CLOSED, specify year closed ..... 19[ ] (13-14)
4. Year first used for process waste from this facility ..... 19[7][3] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7][9] (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (19-26)
   Right justify response hundred tons ..... [ ][ ][ ][ ][ ][3][2] (27-33)
   thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	[9]	(42)
landfill, mixed industrial waste	[9]	(43)
landfill, drummed waste	[2]	(44)
landfill, municipal refuse co-disposed	[1]	(45)
pits/ponds/lagoons	[3]	(46)
deep well injection	[3]	(47)
land farming	[3]	(48)
incineration	[3]	(49)
treatment (eg. neutralizing)	[3]	(50)
reprocessing/recycling	[3]	(51)
other (specify)_____	[3]	(52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

*Same site as previous Form B, but a different mix of waste shipped after 1972

FORM B: DISPOSAL SITE INFORMATION (DO NOT USE)

COMPLETE THIS FORM FOR EVERY SITE (INCLUDING THE LOCATION OF THIS FACILITY AS ONE SITE) USED FOR THE DISPOSAL OF PROCESS WASTES GENERATED BY THIS FACILITY SINCE 1950.

Company Name: W. R. Grace & Co. Division/Subsidiary: Polyfibron Division
Facility Name: GPP/Adams
Name of Site: Adams Sanitary Landfill
Address of Site: East Road
no. street

Adams, Massachusetts 01220
city state zip code

Name of Owner (while used by facility): Town of Adams, Massachusetts
Address:
no. street

city state zip code

Current Owner (if different from above):
Address:
no. street

city state zip code

1. Location (1= the property on which facility is located; 2= off-site) ..... [2] (10)
2. Ownership at time of use (1= company ownership; 2=private but not company ownership) 3=public ownership 9=don't know) ..... [3] (11)
3. Current status (1= closed; 2= still in use; 9=don't know) ..... [2] (12)
   IF CLOSED, specify year closed ..... 19[ ] (13-14)
4. Year first used for process waste from this facility ..... 19[4][5] (15-16)
5. Year last used for process waste from this facility (enter "79" if still in use) ..... 19[7][2] (17-18)
6. Total amount of process waste from this facility disposed at site:
   USE TONS ONLY IF POSSIBLE: thousand gallons ..... [ ] (19-26)
   Right justify response hundred tons ..... [4][7] (27-33)
   thousand cubic yards ..... [ ] (34-41)
7. Specify type(s) of disposal method(s) used at site and whether method is still in use (1=currently in use; 2=no longer in use; 3=never used; 9=don't know)

landfill, mono industrial waste	[9] (42)
landfill, mixed industrial waste	[9] (43)
landfill, drummed waste	[2] (44)
landfill, municipal refuse co-disposed ...	[1] (45)
pits/ponds/lagoons	[3] (46)
deep well injection	[3] (47)
land farming	[3] (48)
incineration	[3] (49)
treatment (eg. neutralizing).....	[3] (50)
reprocessing/recycling	[3] (51)
other (specify) _____....	[3] (52)

8. Users of this site (1=this facility; 2=this facility and other company facilities only; 3=this company and others; 9=don't know) ..... [3] (53)

LIST NAMES AND ADDRESSES OF OTHER KNOWN USERS BELOW

FORM A: GENERAL FACILITY INFORMATION

Company Name: W. R. Grace & Co.
Division/Subsidiary: Polyfibron Division
Facility Name: GPP/Adams

Address: Harmony Street
No. Street

Adams, Massachusetts 01220
City State Zip Code

Name of Person Completing Form: David L. Burge

Position: Process Engineer

Phone Number: (413) 743-0546

1. Year Facility Opened ..... 19 [4][5] (10-11)

2. Primary SIC Code ..... [2][6][4][1] (12-15)

3. Estimate the total amounts of process wastes (excluding wastes sold for use) generated by this facility during 1978:
USE ONLY TONS IF POSSIBLE - right justify response

thousand gallons ..... [ ][ ][ ][ ][ ][ ][ ] (16-24)

hundred tons ..... [ ][ ][ ][ ][ ][ ][6] (25-32)

thousand cubic yards ..... [ ][ ][ ][ ][ ][ ][ ] (33-41)

4. Estimate (in whole percents) how these process wastes generated in 1978 were disposed of:

in landfill ..... [ ][8][9] (42-44)

in pit/pond/lagoon ..... [ ][ ][ ] (45-47)

in deep well ..... [ ][ ][ ] (48-50)

incinerated ..... [ ][1][1] (51-53)

reprocessed/recycled ..... [ ][ ][ ] (54-56)

evaporated ..... [ ][ ][ ] (57-59)

unknown ..... [ ][ ][ ] (60-62)

other (Specify _____) ..... [ ][ ][ ] (63-65)

5. What is the total number of known sites (including disposal on the property where this facility is located as one site) that have been used for the disposal of process wastes from this facility since 1950? ..... [ ][2] (66-68)

COMPLETE ONE FORM "B" FOR EACH OF THE SITES

6. Have any of the process wastes generated at this facility been hauled (removed) from this facility for disposal? (Yes=1; no=2) ..... [1] (69)

IF YES, COMPLETE FORM "C"

7. Do you know the disposal site locations of all of the process waste hauled from your facility since 1950? (Yes=1; no=2) ..... [2] (70)

IF NO, COMPLETE ONE FORM "D" FOR EACH FIRM OR CONTRACTOR WHO TOOK WASTE TO AN UNKNOWN LOCATION

8. Specify the earliest year represented by information from company or facility records supplied on this and other forms ..... 19[7][2] (71-72)

9. Specify the earliest year represented by information from employee knowledge supplied on this and other forms ..... 19[5][0] (73-74)

GRACE
ADAMS

TO: Dave Kronenberg DATE: 12/9/88

FROM: H. A. Johnson SUBJECT: DEQE request for information

CC: A. W. Nasy

1) Originally the Adams Plant truck driver took waste to the Adams landfill. (Roger LeSage and then Ray Clavin)

2) In the latter part of the 1970's "hazardous waste" was sent out in barrels. In at least one instance it was burned and we donated the barrels to the burner as part of the agreement.
(See Solvent Recovery Systems of Connecticut as an example)

3) "Plant Managers" files may contain pertinent references to approved companies for waste disposal

Plant managers were:
Alan Sarbye. 1969-1973 (No longer a Grace employee probably living in Maine)
Tom Gavin.. 1974-1977 (Lexington)
Paul Percy 1977-1979 (DDA Chicago)
Ed Murphy 1979-1983 (Indiana - 1-219-256-8807)

4) Starting with Tom Gavin we had a more formal hazardous waste program.

Paul Przeski a North Adams State "summer intern" started a program in 1981 which was continued by Russ Fowler.

5) Lenz Bobowicz (retired & living in Savoy) gave me most of this information (743-5069) Ask me Johnson

GRACE

W. R. Grace & Co.
62 Whittemore Avenue
Cambridge, MA 02140

(617) 876-1400

December 15, 1988

Stephen F. Joyce
DEQE/Western Regional Office
436 Dwight Street
Springfield, Massachusetts 01103

RE: Information Request
Foisey Farm, Algers Street
Cheshire, Massachusetts

Dear Mr. Joyce

This letter and the attached "Response of W.R. Grace & Co. - Conn. (Grace) constitutes the response of Grace to the Department of Environmental Quality Engineering's Information Request in the above-captioned matter.

As you are aware, Grace received an anonymous telephone call at the end of September which alleged that waste hauled by a private contractor from the Polyfibron Facility in Adams had been buried on the Foisey Farm in Cheshire. Grace notified the Department of Environmental Quality Engineering and the Adams and Cheshire Boards of Health regarding this call and has continued to work in cooperation with both agencies. Since the date of the telephone call Grace has actively and aggressively investigated the alleged incident, has sampled residential well water in the vicinity of the farm and has initiated a Phase I Preliminary Site Investigation.

Both in investigating the alleged incident and in attempting to respond to DEQE's questions in this information request, Grace has made a diligent effort to locate documents and obtain information from current and former employees. However given normal document retention procedures and the inherent limitation of the human memory in recollecting events which happened years ago, Grace cannot, in some instances provide definite answers to the questions.

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

Very truly yours,

Marcia Drake Seeler

Marcia Drake Seeler
Assistant Environmental Counsel

cc: Stephen P. Winslow
Assistant General Counsel

RESPONSE OF W.R. GRACE
FOISEY FARM, CHESHIRE, MASSACHUSETTS

This is a response on behalf of the Adams facility of W.R. Grace & Co. - Conn. ("Grace") to the recent Department of Environmental Quality Engineering (DEQE) information request regarding the Foisey Farm, Cheshire, Massachusetts. The following response is submitted by Grace with the express reservation that it is representative of diligent efforts to respond to questions pertaining to events which may have occurred many years ago.

All answers below are set forth in the same order as the questions posed by DEQE.

Question 1. Transportation by Bob Randall:

(a) Did you ever use Bob Randall to dispose or transport oil and/or hazardous materials?

Answer (1)(a).

Upon information and belief Grace used Bob Randall (herein after referred to as Randall) to remove waste materials from the Adams Facility.

(b) Please give the date, the type and quantity of oil and/or hazardous materials disposed or transported and the disposal site and provide copies of any documents evidencing such disposal.

Answer (1) (b).

Upon information and belief, Randall transported waste from the Adams facility under two different arrangements.

First, at some date believed to be in 1974 or 1975, Randall removed approximately 200 to 300 drums of waste from the Adams facility. The drums are believed to have contained miscellaneous waste including but not limited to rags, papers, scrap materials, water and/or solvent based latexes, and used solvents. The disposal site for the waste removed by Randall is unknown.

In investigating an anonymous telephone call received by the Adams facility, Grace employees received the following information. During a telephone conversation with a Grace employee on September 30, 1988, Randall stated that he had removed drums from the facility and temporarily stored the drums in his driveway. He stated that most of the drums were not full and that they contained a pink compound as well as miscellaneous trash. Grace believes that the pink compound referred to by Randall is a neoprene emulsion. Randall further stated that he found out by accident that the contents of drums solidified when stored in the sun and that he emptied the drums and transported the contents to the Town of Adams landfill and sold the barrels to a Springfield firm.

As part of Grace's investigation, a Grace employee had a conversation on October 4, 1988 with Gean Foisey. During this conversation Mr. Fosiey indicated that sometime in 1975, Randall transported drummed waste to the Foisey farm in Cheshire.. According to the Foisey account, the drums were left in the sun without covers so that the contents would dry. The drums were then tipped over and the balls of rubber were buried in a hole which had been dug by Randall. The waste was covered with one to two feet of soil. Mr. Foisey could not recall if any drums were buried with the waste. Mr. Foisey showed Grace respresentatives the approximate location of the waste disposal on his property. Grace is performing a Phase I investigation of this site.

Under a second arrangement between Randall and Grace, Randall removed latex accumulation from a latex settling basin at the facility. It is believed that this activity occurred during a period from 1974 to 1979. It is further believed that between 25 and 30 drums of the latex residue would be removed by Randall during this process and that this removal occurred once a year during a four to five year period. The disposal site for the latex waste removed by Randall is unknown.

Question 2. Transportation by Yourself or Others:

(a) Have you used your own equipment or hired a transporter other than Bob Randall to transport oil and/or hazardous materials to the Site for disposal?

Answer. No.

Question 3. Generation or Oil and/or Hazardous Waste:

(a) During the 1970's, did the Adam's plant ever use or generate oil and/or hazardous materials?

Answer: Yes.

(b) If your answer to question 3 (a) is yes, please give the type and quantity used annually from 1970 to 1979.

Answer:

The exact type and quantity of oil and/or hazardous

materials used or generated annually from 1970 to 1979 is unknown. Upon information and belief, the facility generated up to six hundred drums of hazardous materials annually, including wash water wastes, acrylates and latex emulsions, plastizers, resins, elastomers, solvents polar and nonpolar, halogenated aliphatics, aromatic solvents, alcohols, and ketones and aldehydes. Representative solvent wastes would include toluene, 1-nitropropane, 1-2-dichloropropane, methyl ethyl ketone, isopropyl alcohol, methyl alcohol, methylene chloride, and ethyl acetate.

Question 4.: Disposal Practices.

Please describe the practice for disposal of oil and/or hazardous materials at the Adam's plant from 1970 to 1979 including the types and quantities of oil and/or hazardous materials disposed annually and the identities of transporter(s) and disposal site(s).

Answer:

Grace objects to this question on the basis that it is outside the information gathering authority granted to the agency by M.G.L. c. 21E. Without waiving this objection Grace responds that the types and quantities of oil and/or hazardous materials disposed of annually during the years 1970 to 1979 is unknown. Wastes generally consisted of acrylates and latex emulsions, resins, elastomers, plastizers, halogenated aliphatics, aromatic solvents, alcohols, ketones and aldehydes, and catalysts.

Until 1972 most, if not all, the waste generated at the Adams facility was disposed of at the Adams Sanitary Landfill. From 1972 to 1979 waste which was characterized as not being hazardous waste under state law continued to be disposed of at the Adams Landfill. Waste from the facility was disposed of in the North Adams Sanitary Landfill in 1975.

According to the Eckhardt Survey, attached hereto, the Adams facility used the following transporters during the periods indicated: Jim Dawson Trucking, North Adams, Massachusetts (1974 - 1979), Silresim Chemical Corp., Lowell, Massachusetts (1974), R.L. Randall, Adams, Massachusetts (1974 - 1979), Solvent Recovery Service of New England, Southington, Connecticut (1976 - 1979), Interex Corporation, Natick, Massachusetts (1979). Although referred to in Form C, of the survey, no hauler information sheet has been located for R.L. Randall. The disposal sites utilized by these transporters listed in the survey are unknown.

Question 5. Transportation Documentation:

(a) Other than the documents already provided in response to previous questions, did you generate, fill out, retain or copy any other documents, including but not limited to contracts, concerning transportation by Bob Randall of oil and/or hazardous material or disposal at the site of oil and/or hazardous material?

Answer: Grace has identified no other documents which were prepared contemporaneously with the removal and disposal of waste from the Adams facility from 1970 to 1979. Documents have been generated under the direction of counsel during the investigation of the anonymous telephone call of September 22, 1988.

Bof I 241 Adams

PHASE I SITE ASSESSMENT

495 EAST HARBOR ROAD
CHESHIRE, MASSACHUSETTS

SUBMITTED TO:

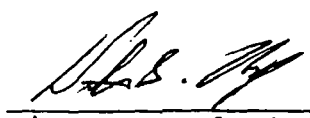
MR. DAVID KRONENBERG
W.R. GRACE AND COMPANY
55 HAYDEN AVENUE
LEXINGTON, MASSACHUSETTS 02173

SUBMITTED BY:

GROUNDWATER TECHNOLOGY, INC.
1641 RIVERDALE STREET
WEST SPRINGFIELD, MASSACHUSETTS 01089

FEBRUARY 1989

Prepared By:



Wilson S. Clayton
Hydrogeologist
Territory Manager

INTRODUCTION

W.R. Grace and Company (Grace) received an anonymous telephone call in September, 1988 which alleged that sometime in the 1970's a quantity of waste was removed from the Grace facility in Adams, Massachusetts by a private contractor and buried on a farm in Cheshire, Massachusetts (Figure 1). Grace notified the Massachusetts Department of Environmental Quality Engineering (DEQE) and the Adams and Cheshire Boards of Health and contracted Groundwater Technology, Inc. to perform a Phase I site investigation to determine if oil or hazardous materials (OHM) were disposed at the site, and provide initial characterization of the nature and extent of OHM, if present.

Grace performed an investigation into the history of alleged disposal activities at the property and reported findings to DEQE in correspondence dated December 15, 1988. Grace also collected well water samples from residences adjacent to Mr. Foisey's property. Grace contracted laboratory analysis of the samples by EPA Method 624 for detection of volatile hydrocarbon compounds, if present. No volatile hydrocarbon compounds were detected in any samples collected.

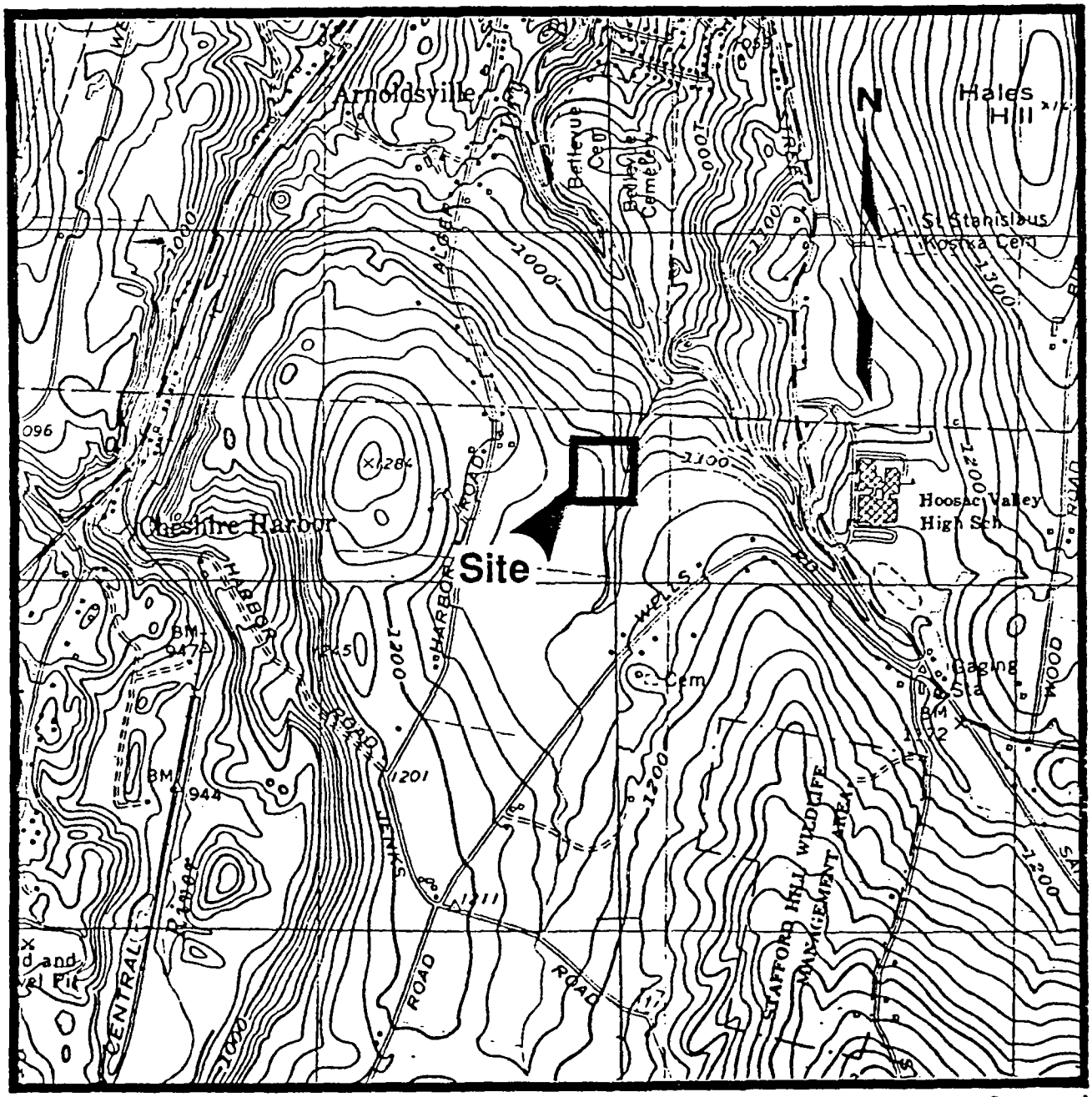
This report presents results of the Phase I site investigation. The scope of this investigation was limited to a visual observation of surface conditions at the site, conversations with Mr. Gene

FIGURE 1

SITE LOCATION MAP

W.R. GRACE FARM

ADAMS, MA.



SOURCE: U.S.G.S. CHESHIRE, MA. & WINDSOR, MA. QUADRANGLE MAPS (1973)

U.T.M. COORDINATES: 653,797E; 4,717,303N; 18N.

LAT., LONG.: 42°35'43"N; 73°07'32"W.

SCALE: 1" = 1475'

0 0.25

MILES

GROUNDWATER TECHNOLOGY, INC.

Foisey and Grace personnel, a review of information provided to DEQE by Grace, geophysical surveys of subsurface conditions, soil sampling, groundwater sampling, surface water sampling, and laboratory analysis. The investigation addressed the likelihood of oil or hazardous material contamination in the subsurface resulting from past known uses of the site.

Geochemistry, hydrogeology, and the geotechnical sciences are inexact sciences. Groundwater conditions and the behavior of contaminants in the subsurface are highly variable in nature. Our results regarding concentrations of various constituents are based upon field sampling and laboratory analyses.

The services Groundwater Technology provided and the judgments Groundwater Technology rendered on this project meet current professional standards. No warranty or guarantee of site conditions is intended. This report has been prepared solely for the use of Grace and any reliance on this report by third parties shall be at such parties own risk.

SITE HISTORY

The property at 495 East Harbor Road in Cheshire, Massachusetts (Figure 1) is currently owned by Mr. Gean Foisey. Mr. Foisey purchased the property in 1972, and has resided at the property since early 1973. Mr. Foisey has operated the property as a farm since that time, raising cattle and horses for personal use and hay for market sale.

Mr. Foisey has indicated to Grace and Groundwater Technology that during 1975 a third party temporarily stored and then buried an undetermined volume of drummed waste from the Grace facility in Adams at his farm. Mr. Foisey apparently did not witness the alleged disposal activities, but believed the waste to be solidified latex rubber. He believed the waste to have been emptied from the drums, and could not recall if any drums were buried with the waste.

The location of the alleged disposal (Figure 2) was indicated by Mr. Foisey to Grace and Groundwater Technology. According to Mr. Foisey, excavation for disposal was achieved from the west. This apparently destroyed a portion of the hedgerow present to the north of the area. Numerous boulders, adjacent to the location, were indicated by Mr. Foisey as having been unearthed during burial activities. The composition of waste materials allegedly buried

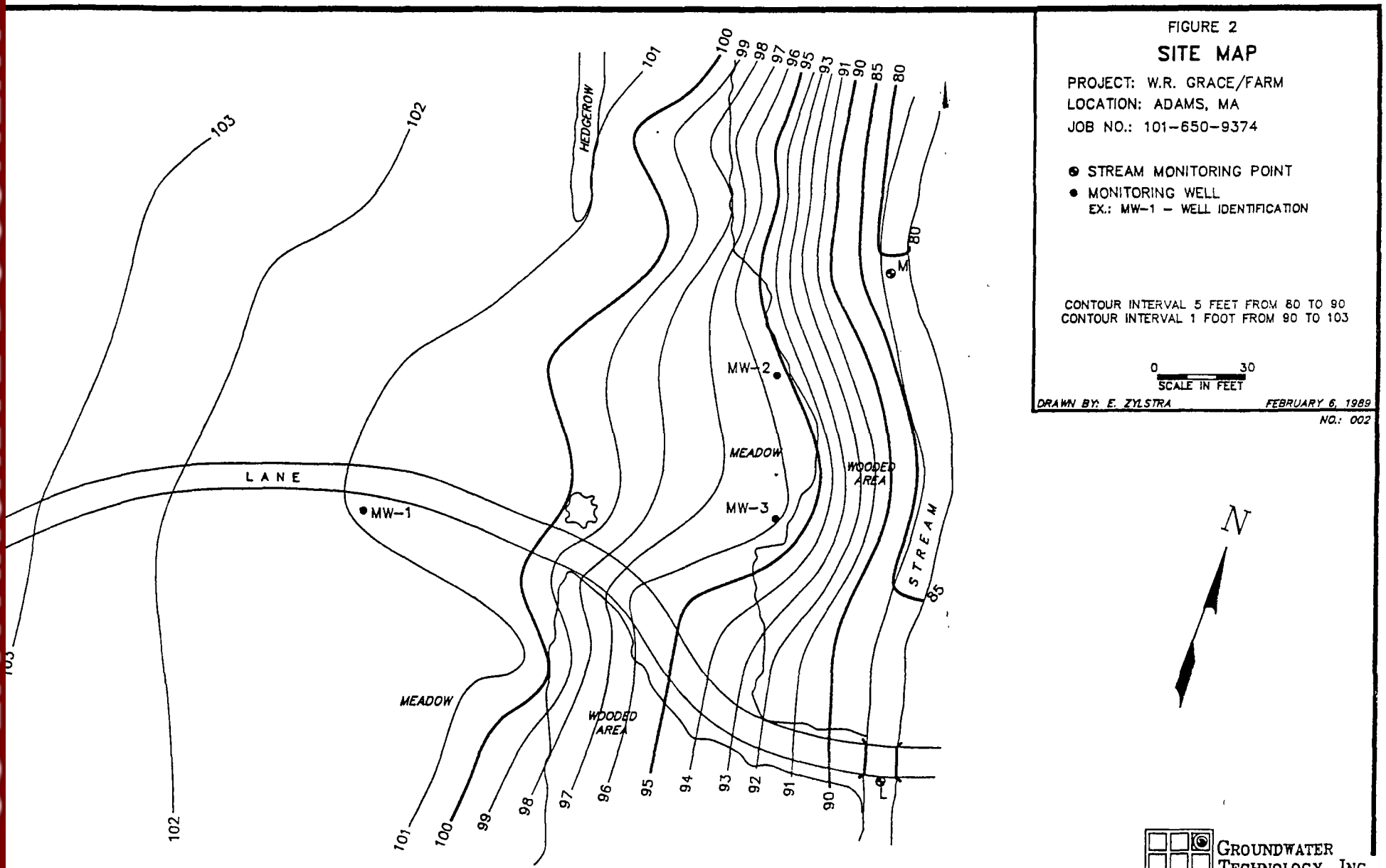


FIGURE 2

SITE MAP

PROJECT: W.R. GRACE/FARM
LOCATION: ADAMS, MA
JOB NO.: 101-650-9374

- STREAM MONITORING POINT
- MONITORING WELL
  EX.: MW-1 – WELL IDENTIFICATION

CONTOUR INTERVAL 5 FEET FROM 80 TO 90
CONTOUR INTERVAL 1 FOOT FROM 90 TO 103

0 30
SCALE IN FEET

DRAWN BY: E. ZYLSTRA FEBRUARY 6, 1989
NO.: 002

GROUNDWATER TECHNOLOGY, INC.

at this location was not known prior to initiating this site investigation.

Waste materials generated by Grace at the Adams facility during the 1970's included acrylates and latex emulsions, plasticizers, resins, elastomers, aromatic and polar and non-polar solvents (including toluene, 1-nitropropane, 1-2-dichloropropane, methyl ethyl ketone, isopropyl alcohol, methyl alcohol, methylene chloride, and ethyl acetate), halogenated aliphatics, alcohols, and ketones and aldehydes.

Box I-2-3-1
Adams

mes F. Murphy, Jr.
ssistant Vice President
Polyfibron Division

GRACE

W. R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

Spills

bcc: D. R. Beckerman
T. O. Gavin
A. T. Michaud - Adams
E. T. Murphy
N. I. Palmer
G. W. Siegel
E. S. Wood

February 8, 1984

Mr. Stephen F. Joyce
Deputy Regional Environmental Engineer
Department of Environmental Quality
Engineering
Air Pollution Control District
1414 State Street
Springfield, Massachusetts 01109

Dear Mr. Joyce:

This will confirm my telephone call today in which I told you that we just found that we had spilled what we think might be between 1 gallon and 45 gallons of toluene at our Adams plant. The spill happened as an overflow of an underground storage tank used to collect toluene which is desorbed from carbon bed emission control equipment.

The spill occurred on February 1, but was not reported because it was thought there was no spill until it was found that an underground overflow pipe to another tank had mistakenly not been installed at the time the control equipment and tank were put in a year and a half ago. I will explain more fully what happened and the things we checked.

When we installed the carbon bed emission control equipment in June of 1982, a part of the system was a pair of underground tanks. One had two compartments, each 3,000 gallons, used for collecting toluene from the desorbing of the carbon bed. The toluene was held in one or the other 3,000 gallon compartments until checked for water content by the lab, and then pumped to the other underground tank (10,000 gallons) for reuse back in the process. The flow to the 3,000 gallon compartments from the carbon bed decanter is by gravity, at a maximum rate of about slightly less than 1/2 gallon/minute when the carbon beds are desorbing.

Each of the 3,000 gallon compartments is equipped with a level gauge, and a high level alarm, and both compartments were connected with an overflow pipe (just a 2" pipe, no valves). This pipe was underground so that it would be below the level of the manhole flange. The tank and all piping were 304 S.S.

On Wednesday, February 1, the operator noticed that the fill pipe on one of the compartments was wet, and the snow was melted in a 6 or 7" circle around the pipe. He reported this, and the carbon bed desorb cycle was shut down.

The log was checked to determine when that compartment was last pumped to the 10,000 gallon tank. The level gauge and high level alarm was found to have a partially plugged bubble tube and was not operating properly. Since the adjacent tank was empty, it was still assumed there could have been no spill unless the connecting overflow pipe were plugged for some reason. Since this was a 2" pipe, this seemed improbable.

Records of what products had been coated on the equipment connected to the carbon bed were collected and calculations were made of how much toluene could have been generated. The one departure from normal in the operation of the equipment was that it had operated over the weekend. Five-day weeks was the normal operating schedule. The calculations were made conservatively, assuming that the coatings were made at the formula solids, no fugative solvent losses, and collection efficiency of 92.5% on the carbon beds. The manufacturer's guarantee on the carbon bed equipment is 85%, but actual operating tests we have made at another plant on similar carbon beds shows that the efficiency ranges between 90 and 95%, hence we used the mid-point.

This calculation showed that between the time the tank was emptied on January 27, 1984 (down to a 165.5 gallon heel), and the time the desorb process was shut down on February 1, 1984, that 45 gallons more than the capacity of the tank could have been generated. A change in solids or efficiency or some other variable could have taken it to none at all, or doubled that.

Since there was no indication of any toluene around the pipe, including little or no odor on the stone around the base of the pipe, etc., our guess was that if there was a spill, it was very small.

Since the adjacent tank was empty, we concluded that the only way there could have been a spill was for the overflow pipe between the tanks to be plugged.

Yesterday, the plant people dug down to check this pipe, and much to everyone's surprise, and to a few people's considerable embarrassment, there was no pipe. There were plugged connections on the tank, but no pipe in between.

This led to my call to you today. As I told you on the phone, there probably was a spill, but there is no indication of any on the ground around the tank. We do not think there was enough to pose a threat to the environment.

To prevent this from happening again, this overflow pipe is being installed now. In the spring, when the ground thaws, we plan to add further insurance by adding another overflow pipe which will connect the two 3,000 gallon compartments with the 10,000 gallon tank.

The level gauge and high level alarm have been repaired and will be put on a preventative maintenance list to be sure they remain in working order.

J. F. Murphy, Jr.

JFM,JR/mlr

[illegible] June [illegible], 1973

[illegible] Springfield/Lexington

[illegible] T. O. Gavin [illegible] Solvent Disposal

[illegible]: C. S. Wood
A. T. Murphy

Our operations in Adams generates on a weekly basis approximately 4 drums of solvent/compound waste. We are presently restricted from dumping in the local landfill any liquid materials. This ban on dumping is to be of indefinite duration and results in a disposal problem for this liquid material. We have employed the use of an outside source to pick up and remove these materials. However, at a cost of $20.00 per drum, this is not the most preferred approach to take.

The purpose of this letter is to request engineering assistance on this problem in order that we may come up with a disposable method which is suitable to the Pioneer Valley Air Pollution Control people as well as to the local Town Fathers. Please assign at your earliest convenience an engineer to assist us in dealing with this problem.

T. O. Gavin

TOG:sml

May 2, 1978

Lena Bobowiec of the Adams office provided the following information that you needed on solvents.

SOLVENTS PURCHASED IN 1976

OUR CODE	TRADENAME	$	QUANTITY PURCHASED
POL	Toluene	$86,929.80	1,023,782
MEK	Methyl Ethyl Ketone	7,323.20	42,481
ONE	Isopropnol 91	7,670.01	65,323
PEDE	Propylene dichloride	44,489.32	502,370
WADY	Chlorothene	4,782.24	18,000
MEOW	Monochloro benzene	1,750.00	5,000
MCL	Methylene Chloride	3,888.00	14,400
METH	Methanol	825.55	5,032

These solvents are the ones used in Manufacturing at the Adams plant.

/mlr

MAY 16 1985

The Commonwealth of Massachusetts

Executive Office of Environmental Affairs
Department of Environmental Quality Engineering
Division of Water Pollution Control
One Winter Street, Boston 02108

Thomas C. McMahon
Director

Bof I 232
Adams MA

May 8, 1985

Mr. Gary Siegel
Environmental Engineer
W.R. Grace Co.
Harmony Street
Adams, MA 01220

Re: Surface Water Discharge Permit

Dear Sir:

The Division of Water Pollution Control is in reciept of the application for a surface water discharge permit filed on May 3, 1985 for a non-contact cooling water discharge of .16 mgd to the Hoosic River.

The Division will review the application and after preparing a draft permit the Division will forward you a copy for review during the 30 day public comment period. All discharges other than non-contact cooling water discharges of less than 1 mgd are still permitted jointly by the US-EPA and the Division of Water Pollution Control under the National Pollutant Discharge Elimination System permit program.

If there are any questions, please contact Glenn Gilmore of the Division at (617) 292-5673.

Very truly yours,

Thomas C. McMahon

Thomas C. McMahon
Director

TCM/CHN/bd

cc: DEQE, Western Regional Office

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

May 1, 1985

Ms. Cynthia Hall Nakashima
Permit Section
Division of Water Pollution Control
Department of Environmental
Quality Engineering
One Winter Street
Boston, Massachusetts 02108

Dear Ms. Nakashima:

RE: MAG250007

Enclosed please find three (3) copies of Forms 1 and 2-C for the non-contact cooling water discharge from the W. R. Grace & Co. facility in Adams, Massachusetts into the Hoosic River.

If you have any questions on the application, please contact me at the above number.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr

cc: A. T. Michaud - Grace/Adams

Enclosure

bcc: Mark Stoler - Cambridge

314 CMR: DIVISION OF WATER POLLUTION CONTROL

3.20: Form 1

General Information
and Notification

DATE RECEIVED

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF WATER POLLUTION CONTROL

APPLICATION FOR PERMIT TO DISCHARGE TO WATERS OF THE COMMONWEALTH

To be filed by all persons required to obtain a permit to discharge to waters of the Commonwealth.

Do not attempt to complete this form before reading the accompanying instructions.

- Please type or print -

1. NAME, ADDRESS, LOCATION, AND TELEPHONE NUMBER OF FACILITY PRODUCING THE DISCHARGE -

A. Name W. R. Grace & Co.
B. Mailing Address
Street Harmony St.
City Adams State MA Zip 01220
C. Location
Street Harmony Street City Adams
County Berkshire
D. Telephone No. (413) - 743-0546

OWNERSHIP		STATUS	
Individual		Private	X
Corporation	X	Public	
Partnership		Other	
Other			

2. CONTACT PERSON -

Give the name, title, and work telephone number of a person who is thoroughly familiar with the operation of the facility and with the facts reported in this application and who can be contacted by the Division of Water Pollution Control if necessary.

A. Name Gary Siegel
B. Title Environmental Engineer
C. Telephone No. (617) - 861-6600

314 CMR: DIVISION OF WATER POLLUTION CONTROL

3. FACILITY STATUS -

existing X proposed _____

4. Does the project affect a site of historic or archeological significance, as defined in regulations of the Massachusetts Historical Commission, 950 CMR 71.00?

Yes _____ No X

5. Does this project require a filing under 301 CMR 10.00, the Massachusetts Environmental Policy Act?

Yes _____ No X

If yes, has a filing been made?

Yes _____ No _____

6. APPLICATION FORMS NEEDED -

Answer questions A through F to determine which additional application forms you need to submit to the Division of Water Pollution Control. If you answer "Yes" to any question, you must submit this form and the supplemental form listed in the parentheses following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "No" to each question, you need not submit any of these forms.

	Yes	No	Form Attached
A. Is this facility an existing or proposed publicly owned treatment works which results in a discharge to surface waters of the Commonwealth? (Form 2A)		X	
B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to the surface waters of the Commonwealth? (Form 2B)		X	
C. Does or will this facility result in a discharge to surface waters of the Commonwealth other than those described in A or B above? (Form 2C)	X		✓

D. Is this facility an existing or proposed treatment works which results in a discharge only of treated sewage to the land surface or to the ground waters of the Commonwealth? (Form GW-A)		X	
E. Does or will this facility include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to the land surface or ground waters of the Commonwealth? (Form GW-B)		X	
F. Does or will this facility result in a discharge to the land surface or the ground waters of the Commonwealth other than those described in D or E above? (Form GW-C)		X	

7. Is this a RCRA facility as defined in 314 CMR 8.03?

Yes _____ No X

If yes, submit the information on Form HW contained in 310 CMR 8.20 in accordance with the provisions of 314 CMR 8.08.

8. INDUSTRIAL CLASSIFICATION -

List, in descending order of significance, the four (4) digit standard industrial classification (SIC) codes which best describe your facility in terms of the principal products or services you produce or provide. Also, specify each classification in words.

	SIC CODE	SPECIFY
A.	2641	coating of paper
B.	2295	coating of fabrics
C.		
D.		

9. FACILITY OPERATOR -

Give the name, as it is legally referred to, of the person, firm, public organization, or other entity which operates the facility described in this application. If the facility owner is also the operator, write owner and list mailing address only if different from that listed in number 1 above.

A. Name W. R. Grace & Co.

B. Mailing Address

Street _____

City _____ State _____ Zip _____

314 CMR: DIVISION OF WATER POLLUTION CONTROL

OWNERSHIP		STATUS	
Individual		Private	X
Corporation	X	Public	
Partnership		Other	
Other			

10. LOCATION OF FACILITY -

A. Is the facility located on Indian Lands?

Yes _____ No X

B. Provide a topographic map or maps of the area extending at least to one mile beyond the property boundaries of the facility which clearly show the following:

The legal boundaries of the facility;

The location and serial number of each of your existing and proposed intake and discharge structures;

All hazardous waste management facilities;

All springs and surface water bodies in the area, plus all drinking water wells within one mile of the facility which are identified in the public record or otherwise known to you.

If an intake or discharge structure, hazardous waste disposal site, or injection well associated with the facility is located more than one mile from the plant, include it on the map, if possible. If not, attach additional sheets describing the location of the structure, disposal site, or well, and identify the U.S. Geological Survey (or other) map corresponding to the location.

On each map, include the map scale, meridian arrow showing north, and latitude and longitude to the nearest whole second. On all maps of rivers, show the direction of the current, and in tidal waters, show the directions of the ebb and flow tides. Use a 7-1/2 minute series map published by the U.S. Geologic Survey.

11. NATURE OF BUSINESS -

Briefly describe the nature of your business, include products produced or services provided.

The plant is involved with the manufacture of paper and textile printing blankets. This involves the coating of paper and textiles with solvent based rubber coatings. This also includes grinding the surface of the blankets and cutting them to finished product size. The plant has eight active coating lines.

12. WATER SUPPLY DATA -

A. List sources of water supply and annual water consumption for the past 5 years.

Water Sources	Year 1.	2.	3.	4.	5.	
1. Adams Fire District	63.4	59.0	62.8	71.3	78.0	Millions of Gallons
~~2.~~						
3.						
TOTAL:						

B. Please show the location of your water sources on the map described in paragraph 7.

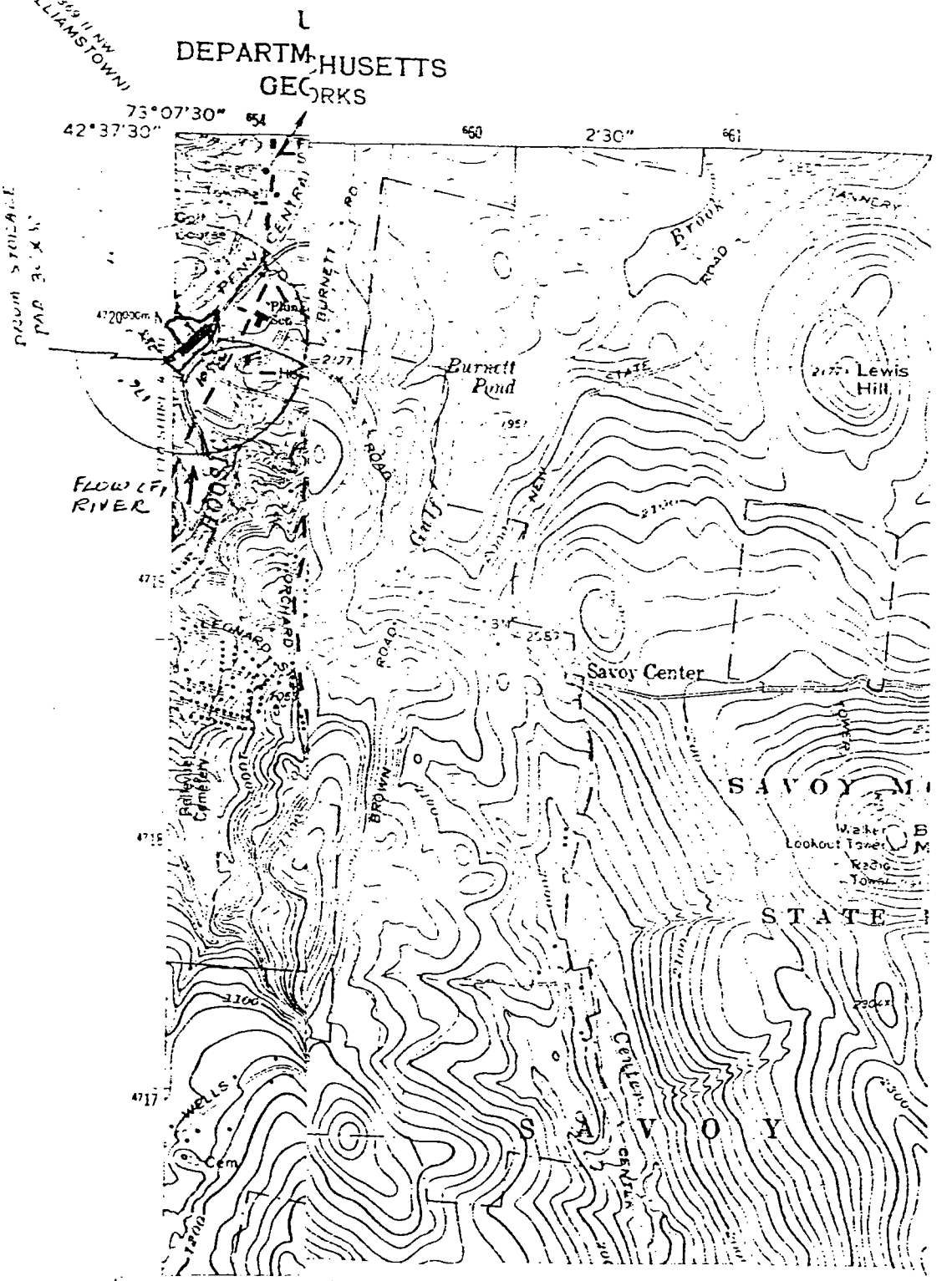
13. CERTIFICATION -

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Printed Name of Applicant — Title

Signature of Applicant — Date Signed

Name of Preparer — Title — Telephone No.



Mapped, edited, a

Control by USGS, U

Planimetry by photo
taken 1942. Topo
Revised from aerial

Polyconic projection
10,000-foot grid ba
mainland zone
1000-meter Univers
zone 18, shown in b

Fine red dashed lin

1 MILE
6000 7000 FEET
1 KILOMETER

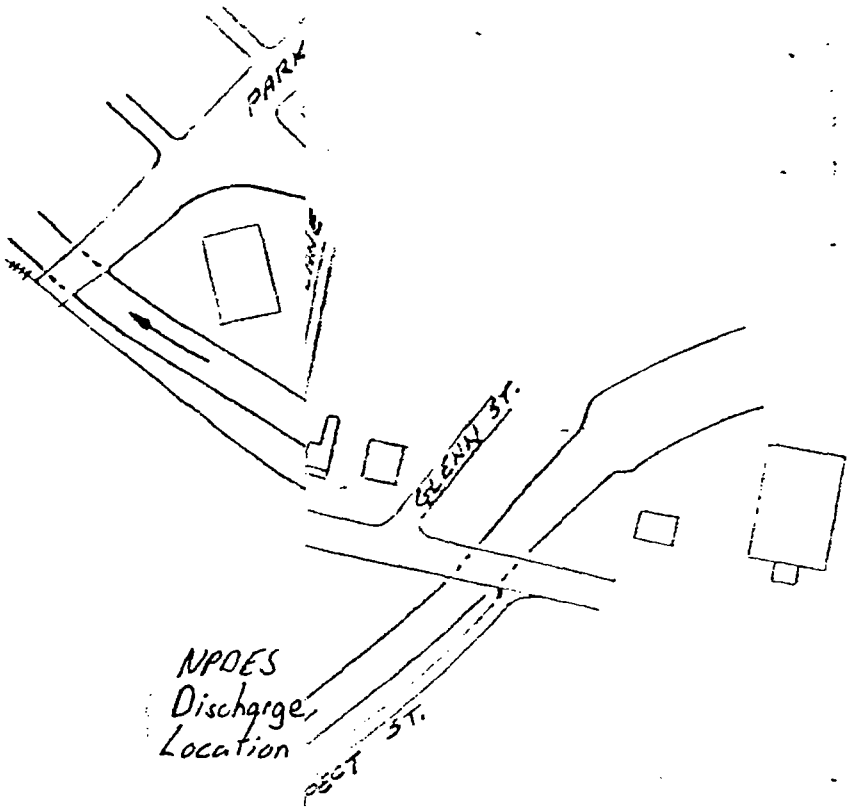
DIAGRAM)
929

Y STANDARDS
IRGINIA 22092
VAILABLE ON REQUEST

10 FT
20 FEET

MASS

QUADRANGLE LOCATION



100 0 100 200
SCALE

W. R. GRACE & CO., POLYFIBRON DIVISION
CAMBRIDGE, MASSACHUSETTS 02140, U.S.A.

GENERAL AREA MAP

MS PLANT ADAMS, MASS

DATE 4-4-72

MK APP.	SHEET OF	DWG.	
ERT MADE PURSUANT TO DRAWING CARRIES NO LICENSE OF NY KIND	PROJ. NO.	NO.	

Please print or type in the unshaded areas only.

EPA I.D. NUMBER (copy from Item 1 of Form 1): MAD 002081651

Form Approved OMB No. 158-R0173

U.S. ENVIRONMENTAL PROTECTION AGENCY

APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER

EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURAL OPERATIONS

Consolidated Permits Program

I. OUTFALL LOCATION

For each outfall, list the latitude and longitude of its location to the nearest 15 seconds and the name of the receiving water.

A. OUTFALL NUMBER (list)	B. LATITUDE			C. LONGITUDE			D. RECEIVING WATER (name)
	1. DEG.	2. MIN.	3. SEC.	1. DEG.	2. MIN.	3. SEC.	
001	42	37	7	73	7	23	Hoosic River Flood Control Channel

II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES

A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined (*e.g., for certain mining activities*), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.

B. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.

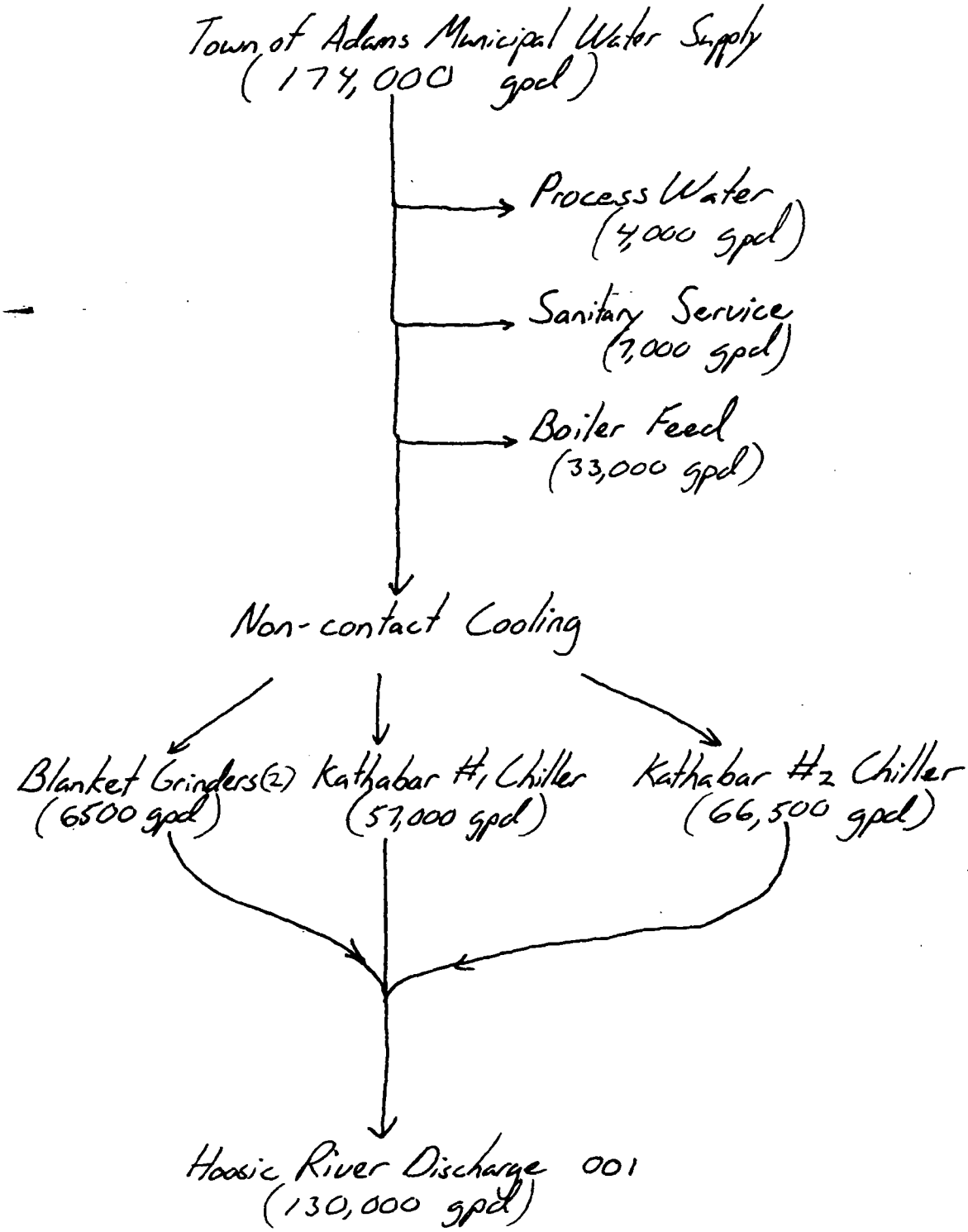
1. OUTFALL NO. (list)	2. OPERATION(S) CONTRIBUTING FLOW		3. TREATMENT		
	a. OPERATION (list)	b. AVERAGE FLOW (include units)	a. DESCRIPTION	b. LIST CODES FROM TABLE 2C-1	
001	Blanket Grinders (2)	6500 gpd	None (non-contact cooling)		
	Kathabar #1 Chiller	57,000 gpd	None (non-contact cooling)		
	Kathabar #2 Chiller	66,500 gpd	None (non-contact cooling)		

OFFICIAL USE ONLY (*effluent guidelines sub-categories*)

Form 2C
Item II A.

Process Flow Diagram

W.R. Grace & Co., Adams, Massachusetts
MAD 002081651



GWS
4/24/85

CONTINUED FROM THE FRONT

[redacted] intermittent runoff, leaks, or spills, are any of the discharges described in Items II-A or B intermittent or seasonal?

☐ YES *(complete the following table)* ☒ NO *(go to Section III)*

OUTFALL NUMBER *(list)*	[redacted] CONTRIBUTING FLOW *(list)*	3. FREQUENCY		4. FLOW				
		a. DAYS PER WEEK *(specify average)*	b. MONTHS PER YEAR *(specify average)*	a. FLOW RATE *(in mgd)*		b. TOTAL VOLUME *(specify with units)*		c. DURATION *(in days)*
				1. LONG TERM AVERAGE	2. MAXIMUM DAILY	1. LONG TERM AVERAGE	2. MAXIMUM DAILY	

III. MANUFACTURING

A. Does an effluent guideline limitation promulgated by EPA under Section 304 of the Clean Water Act apply to your facility?

☐ YES *(complete Item III-B)* ☒ NO *(to to Section IV)*

B. Are the limitations in the applicable effluent guideline expressed in terms of production *(or other measure of operation)*?

☐ YES *(complete Item III-C)* ☒ NO *(go to Section IV)*

C. If you answered "Yes" to Item III-B, list the quantity which represents an actual measurement of your maximum level of production, expressed in the terms and units used in the applicable effluent guideline, and indicate the affected outfalls.

1. MAXIMUM QUANTITY			2. AFFECTED OUTFALLS *(list outfall numbers)*
a. QUANTITY PER DAY	b. UNITS OF MEASURE	c. OPERATION, PRODUCT, MATERIAL, ETC. *(specify)*	

IV. IMPROVEMENTS

A. Are you now required by any Federal, State or local authority to meet any implementation schedule for the construction, upgrading or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ YES *(complete the following table)* ☒ NO *(go to Item IV-B)*

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS		3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE	
	a. NO.	b. SOURCE OF DISCHARGE		a. REQUIRED	b. PROJECTED

B. OPTIONAL: You may attach additional sheets describing any additional water pollution control programs *(or other environmental projects which may affect your discharges)* you now have underway or which you plan. Indicate whether each program is now underway or planned, and indicate your actual or planned schedules for construction. ☐ MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED

EPA I.D. NUMBER (copy from Item 1 of Form 1)
MAD 002081651

Form Approved OMB No. 158-R0173

V. INTAKE AND EFFLUENT CHARACTERISTICS

A, B, & C: See instructions before proceeding — Complete one set of tables for each outfall — Annotate the outfall number in the space provided. NOTE: Tables V-A, V-B, and V-C are included on separate sheets numbered V-1 through V-9.

D. Use the space below to list any of the pollutants listed in Table 2c-3 of the instructions, which you know or have reason to believe is discharged or may be discharged from any outfall. For every pollutant you list, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE
None Known			

VI. POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

A. Is any pollutant listed in Item V-C a substance or a component of a substance which you do or expect that you will over the next 5 years use or manufacture as an intermediate or final product or byproduct?

☐ YES *(list all such pollutants below)* ☒ NO *(go to Item VI-B)*

B. Are your operations such that your raw materials, processes, or products can reasonably be expected to vary so that your discharges of pollutants may during the next 5 years exceed two times the maximum values reported in Item V?

☐ YES *(complete Item VI-C below)* ☒ NO *(go to Section VII)*

C. If you answered "Yes" to Item VI-B, explain below and describe in detail the sources and expected levels of such pollutants which you anticipate will be discharged from each outfall over the next 5 years, to the best of your ability at this time. Continue on additional sheets if you need more space.

CONTINUED FROM THE FRONT

[illegible] TOXICITY TESTING DATA

[illegible] ☐ YES (identify the test(s) and describe their purposes below) ☒ NO (go to Section VIII)

VIII. CONTRACT ANALYSIS INFORMATION

Were any of the analyses reported in Item V performed by a contract laboratory or consulting firm?

☐ YES (list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below) ☒ NO (go to Section IX)

A. NAME	B. ADDRESS	C. TELEPHONE (area code & no.)	D. POLLUTANTS ANA (list)

IX. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application a attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that t formation is true, accurate and complete. I am aware that there are significant penalties for submitting false information, includi possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. PHONE NO. (area code & no.)
C. SIGNATURE	D. DATE SIGNED

IX. CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. NAME & OFFICIAL TITE William H. Starr Vice President For Business Development

B. AREA CODE & PHONE NUMBER (617) 861-6600

C. SIGNATURE [signature]

D. DATE SIGNED 1 May, 1985

PLEASE PRINT OR TYPE IN THE UNSHADED AREAS ONLY. You may report some or all of this information on separate sheets *(use the same format)* instead of completing these pages.
SEE INSTRUCTIONS.

EPA I.D. NUMBER *(copy from Item 1 of Form 1)*: MAD 002081651

Form Approved OMB No. 158-R0173

V. INTAKE AND EFFLUENT CHARACTERISTICS *(continued from page 3 of Form 2-C)*

OUTFALL NO. 001

PART A - You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

1. POLLUTANT	2. EFFLUENT							3. UNITS *(specify if blank)*		4. INTAKE *(optional)*		
	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE *(if available)*		c. LONG TERM AVRG. VALUE *(if available)*		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Biochemical Oxygen Demand (BOD)	The discharge consists solely of non contact cooling water which is supplied											
b. Chemical Oxygen Demand (COD)	from the Town's drinking water supply system. Nothing is added to the											
c. Total Organic Carbon (TOC)	cooling water, except heat. Grace is requesting a waiver from these											
d. Total Suspended Solids (TSS)	analytical requirements											
e. Ammonia (as N)												
f. Flow	VALUE 160,000		VALUE		VALUE 130,000		12*			VALUE		
g. Temperature (winter)	VALUE 15.5		VALUE		VALUE 13		12	°C		VALUE		
h. Temperature (summer)	VALUE 20		VALUE		VALUE 19		12	°C		VALUE		
i. pH	MINIMUM 6.0	MAXIMUM 7.5	MINIMUM	MAXIMUM			12	STANDARD UNITS				

PART B - Mark "X" in column 2-a for each pollutant you know or have reason to believe is present. Mark "X" in column 2-b for each pollutant you believe to be absent. If you mark column 2-a for any pollutant, you must provide the results of at least one analysis for that pollutant. Complete one table for each outfall. See the instructions for additional details and requirements.

1. POLLUTANT AND CAS NO. *(if available)*	2. MARK 'X'		3. EFFLUENT							4. UNITS		5. INTAKE *(optional)*		
	a. BELIEVED PRESENT	b. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE *(if available)*		c. LONG TERM AVRG. VALUE *(if available)*		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
a. Bromide (24959-67-9)		X												
b. Chlorine, Total Residual		X												
c. Color		X												
d. Fecal Coliform		X												
e. Fluoride (16984-48-8)		X												
f. Nitrate—Nitrite (as N)		X												

* Flow rates are based on permit monitoring reports plus plant water usage records

ITEM V-B CONTINUED FROM FRONT

1. POLLUTANT AND CAS NO. (if available)	2. MARK 'X' a. PRESENT	2. MARK 'X' b. ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	3. EFFLUENT a. MAXIMUM DAILY VALUE (2) MASS	3. EFFLUENT b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	3. EFFLUENT b. MAXIMUM 30 DAY VALUE (if available) (2) MASS	3. EFFLUENT c. LONG TERM AVG. VALUE (if available) (1) CONCENTRATION	3. EFFLUENT c. LONG TERM AVG. VALUE (if available) (2) MASS	3. EFFLUENT d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	4. UNITS b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (2) MASS
[redacted]		X											
[redacted]		X											
[redacted]		X											
[redacted]													
[redacted]		X											
[redacted]		X											
[redacted] Total		X											
(4) Radium 226, Total		X											
k. Sulfate (as SO_4) (14808-79-8)		X											
l. Sulfide (as S)		X											
m. Sulfite (as SO_3) (14265-45-3)		X											
n. Surfactants		X											
o. Aluminum, Total (7429-90-5)		X											
p. [redacted]		X											
q. [redacted] Total (7440-62-8)		X											
[redacted]		X											
[redacted]		X											
[redacted]		X											
[redacted]		X											
[redacted]		X											
w. Tin, Total (7440-31-5)		X											
x. Titanium, Total (7440-32-6)		X											

CONTINUE ON PAGE V - 3

EPA I.D. NUMBER (copy from Item 1 of Form 1)	OUTFALL NUMBER
MAD 022087657	001

CONTINUED FROM PAGE 3 OF FORM 2-C

Form Approved OMB No. 158-R0173

PART C - If you are a primary industry and this outfall contains process wastewater, refer to Table 2c-2 in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-a for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. If you are not required to mark column 2-a *(secondary industries, non-process wastewater outfalls, and non-required GC/MS fractions)*, mark "X" in column 2-b for each pollutant you know or have reason to believe is present. Mark "X" in column 2-c for each pollutant you believe to be absent. If you mark either columns 2-a or 2-b for any pollutant, you must provide the results of at least one analysis for that pollutant. Note that there are seven pages to this part; please review each carefully. Complete one table *(all seven pages)* for each outfall. See instructions for additional details and requirements.

1. POLLUTANT AND CAS NUMBER (If available)	2. MARK 'X'			3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
METALS, CYANIDE, AND TOTAL PHENOLS															
1M. Antimony, Total (7440-36-0)			X												
2M. Arsenic, Total (7440-38-2)			X												
3M. Beryllium, Total, 7440-41-7)			X												
4M. Cadmium, Total (7440-43-9)			X												
5M. Chromium, Total (7440-47-3)			X												
6M. Copper, Total (7550-50-8)			X												
7M. Lead, Total (7439-92-1)			X												
8M. Mercury, Total (7439-97-6)			X												
9M. Nickel, Total (7440-02-0)			X												
10M. Selenium, Total (7782-49-2)			X												
11M. Silver, Total (7440-22-4)			X												
12M. Thallium, Total (7440-28-0)			X												
13M. Zinc, Total (7440-66-6)			X												
14M. Cyanide, Total (57-12-5)			X												
15M. Phenols, Total			X												
DIOXIN															
2,3,7,8-Tetrachlorodibenzo-P-Dioxin (1764-01-6)			X	DESCRIBE RESULTS											

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
[illegible] – VOLATILE COMPOUNDS															
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible] (75-71-8)			X												
[illegible]			X												
[illegible] Dichloro- [illegible]			X												
[illegible] Dichloro- [illegible]			X												
[illegible] Dichloro- [illegible] (78-87-5)			X												
18V. 1,3-Dichloro-propylene (542-75-6)			X												
19V. Ethylbenzene (100-41-4)			X												
20V. Methyl Bromide (74-83-9)			X												
21V. Methyl Chloride (74-87-3)			X												

CONTINUE ON PAGE V-5

EPA I.D. NUMBER (copy from Item 1 of Form 1): NPD 032087651

OUTFALL NUMBER: 001

Form Approved OMB No. 158-R0173

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X'			3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (if available)		c. LONG TERM AVRG. VALUE (if available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS (continued)															
22V. Methylene Chloride (75-09-2)			X												
23V. 1,1,2,2-Tetrachloroethane (79-34-5)			X												
24V. Tetrachloroethylene (127-18-4)			X												
25V. Toluene (108-88-3)			X												
26V. 1,2-Trans-Dichloroethylene (156-60-5)			X												
27V. 1,1,1-Trichloroethane (71-55-6)			X												
28V. 1,1,2-Trichloroethane (79-00-5)			X												
29V. Trichloroethylene (79-01-6)			X												
30V. Trichlorofluoromethane (75-69-4)			X												
31V. Vinyl Chloride (75-01-4)			X												
GC/MS FRACTION – ACID COMPOUNDS															
1A. 2-Chlorophenol (95-57-8)			X												
2A. 2,4-Dichlorophenol (120-83-2)			X												
3A. 2,4-Dimethylphenol (105-67-9)			X												
4A. 4,6-Dinitro-O-Cresol (534-52-1)			X												
5A. 2,4-Dinitrophenol (51-28-5)			X												
6A. 2-Nitrophenol (88-75-5)			X												
7A. 4-Nitrophenol (100-02-7)			X												
8A. P-Chloro-M-Cresol (59-50-7)			X												
9A. Pentachlorophenol (87-86-5)			X												
10A. Phenol (108-95-2)			X												
11A. 2,4,6-Trichlorophenol (88-06-2)			X												

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (If available)	2. MARK 'X' a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	(2) MASS	b. MAXIMUM 30 DAY VALUE (If available) (1) CONCENTRATION	(2) MASS	c. LONG TERM AVRG. VALUE (If available) (1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	(2) MASS	b. NO. OF ANALYSES
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS															
11B. Acenaphthene (83-32-9)			X												
12B. Acenaphthylene (208-96-8)			X												
13B. Anthracene (120-12-7)			X												
14B. Benzidine (92-87-5)			X												
15B. Benzo (a) Anthracene (56-55-3)			X												
16B. Benzo (a) Pyrene (50-32-8)			X												
17B. 3,4-Benzo-fluoranthene (205-99-2)			X												
18B. Benzo (ghi) Perylene (191-24-2)			X												
19B. Benzo (k) Fluoranthene (207-08-9)			X												
20B. Bis (2-Chloroethoxy) Methane (111-91-1)			X												
21B. Bis (2-Chloroethyl) Ether (111-44-4)			X												
22B. Bis (2-Chloroisopropyl) Ether (39638-32-9)			X												
23B. Bis (2-Ethylhexyl) Phthalate (117-81-7)			X												
24B. 4-Bromophenyl Phenyl Ether (101-55-3)			X												
25B. Butyl Benzyl Phthalate (85-68-7)			X												
26B. 2-Chloronaphthalene (91-58-7)			X												
27B. 4-Chlorophenyl Phenyl Ether (7005-72-3)			X												
28B. Chrysene (218-01-9)			X												
29B. Dibenzo (a,h) Anthracene (53-70-3)			X												
30B. 1,2-Dichlorobenzene (95-50-1)			X												
31B. 1,3-Dichlorobenzene (541-73-1)			X												

CONTINUED FROM PAGE V-6

EPA I.D. NUMBER (copy from Item 1 of Form 1)	OUTFALL NUMBER
MAD 33208 651	001

Form Approved OMB No. 158-R0173

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X' a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	(2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	(2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	(2) MASS	b. NO. OF ANALYSES
B. BASE/NEUTRAL COMPOUNDS (continued)															
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible]			X												
[illegible] ...methylamine (62-75-9)			X												
43B. N-Nitrosodi-N-Propylamine (621-64-7)			X												

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK 'X' a. TESTING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	3. EFFLUENT a. MAXIMUM DAILY VALUE (1) CONCENTRATION	(2) MASS	b. MAXIMUM 30 DAY VALUE (if available) (1) CONCENTRATION	(2) MASS	c. LONG TERM AVRG. VALUE (if available) (1) CONCENTRATION	(2) MASS	d. NO. OF ANALYSES	4. UNITS a. CONCENTRATION	b. MASS	5. INTAKE (optional) a. LONG TERM AVERAGE VALUE (1) CONCENTRATION	(2) MASS	b. NO. OF ANALYSES
GC/MS FRACTION – BASE/NEUTRAL COMPOUNDS (continued)															
45. N-Nitrosodiphenylamine (86-30-6)			X												
46. Phenanthrene (85-01-8)			X												
47. Pyrene (129-00-0)			X												
48. 1,2,4 - Trichlorobenzene (120-82-1)			X												
GC/MS FRACTION – PESTICIDES															
49. Aldrin (309-00-2)			X												
50. α-BHC (319-84-6)			X												
51. β-BHC (319-85-7)			X												
52. γ-BHC			X												
			X												
			X												
			X												
			X												
			X												
			X												
			X												
			X												
			X												
			X												
			X												
			X												

EPA Form 3510-2C (8-80)

CONTINUE ON PAGE V-9

EPA I.D. NUMBER (copy from Item 1 of Form 1): MAD 002058657

OUTFALL NUMBER: 001

Form Approved OMB No. 158-R0173

1. POLLUTANT AND CAS NUMBER (If available)	2. MARK 'X'			3. EFFLUENT							4. UNITS		5. INTAKE (optional)		
	a. TARGET ING REQUIRED	b. BELIEVED PRESENT	c. BELIEVED ABSENT	a. MAXIMUM DAILY VALUE		b. MAXIMUM 30 DAY VALUE (If available)		c. LONG TERM AVRG. VALUE (If available)		d. NO. OF ANALYSES	a. CONCENTRATION	b. MASS	a. LONG TERM AVERAGE VALUE		b. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION — PESTICIDES (continued)															
17P. Heptachlor Epoxide (1024-57-3)			X												
18P. PCB-1242 (53469-21-9)			X												
19P. PCB-1254 (11097-69-1)			X												
20P. PCB-1221 (11104-28-2)			X												
21P. PCB-1232 (11141-16-5)			X												
22P. PCB-1248 (12672-29-6)			X												
23P. PCB-1260 (11096-82-5)			X												
24P. PCB-1016 (12674-11-2)			X												
25P. Toxaphene (8001-35-2)			X												

Thomas C. McMahon
Director

The Commonwealth of Massachusetts

Executive Office of Environmental Affairs
Department of Environmental Quality Engineering
Division of Water Pollution Control
One Winter Street, Boston 02108

March 25, 1985

Re: MAG250007

W.R. Grace & Co.
Harmony Street
Adams, MA 01220

Dear Sir:

The Division has received notification from the US-EPA that your facility will be covered under the General Permit MAG250007 for a 0.094 million gallon per day (MGD) non-contact cooling water discharge to the Hoosic River. Hoosic River is designated a Class B water of the Commonwealth.

314 CMR 2.00 and 3.00 require that this facility apply for and recieve a Surface Water Discharge Permit issued by the Division of Water Pollution Control. To comply with State requirements, complete Form 1 and 2-C (instructions and applications enclosed) in triplicate and return to the Massachusetts Division of Water Pollution Control, Permit Section, One Winter Street, 7th floor, Boston, MA 02108 within 30 days of receipt of this letter.

If there are any questions, please contact Cynthia Hall Nakashima of this Division at (617) 292-5668.

Very truly yours,

Thomas C. McMahon
Director

TCM/CHN/bd
Enclosures

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

February 6, 1985

Ms. Nancy Sicliano
Compliance Branch - Room 2109
Water Management Division
U.S. Environmental Protection Agency
J.F. Kennedy Federal Building
Boston, Massachusetts 02203

Dear Ms. Sicliano:

RE: MAG250000

As a follow up to our conversations of January 29 and 30, this letter confirms that the Notice of Intent filed September 24, 1984 and the supplementary information Grace sent to you on January 10, 1985 was only for the discharge of non-contact cooling water from the Grace plant in Adams. Any reference to storm water in the above correspondences was unintentional. The words storm water were included because I thought the General Permit included both types of discharge. A check of Grace's previous permits (#MA0006009) would show that only non-contact cooling water discharge has been permitted.

I hope this information is sufficient, and I apologize for any inconvenience or misunderstanding.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr/33

cc: A. T. Michaud - Grace/Adams

D.R. Beckerman, Vice President
Polyfibron Division

Industrial Chemicals Group
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

GRACE

January 10, 1985

Ms. Nancy Sicliano
Compliance Branch — Room 2109 223-3940
Water Management Division
U.S. Environmental Protection Agency
J.F.K. Federal Building
Boston, Massachusetts 02203

Dear Ms. Sicliano:

RE: MAG250000
MA0006009

This letter is in response to your request for additional information concerning W. R. Grace & Co.'s Notice of Intent to be covered by the conditions of the general NPDES permit (#MAG250000) for non-contact cooling and storm water discharges. The Notice of Intent covered a single non-contact cooling water discharge for just the W. R. Grace & Co. facility located on Harmony Street in Adams, Massachusetts. The requested information is as follows:

Operator of Facility	W. R. Grace & Co. Harmony Street Adams, Massachusetts
Owner of Facility	W. R. Grace & Co. Grace Plaza 1114 Avenue of the Americas New York, New York
Nature of Business	The manufacture of paper and textile printing blankets. This involves the coating of paper and textiles with water or solvent base rubber coatings.
Receiving Waters	Hoosic River (flood control channel)

Discharge Number and Type	001; non-contact cooling water (Note: previous application listed three discharge outfalls. These represented the three unit operations contributing to the non-contact cooling discharge. These flow into the river at a single point.)
Volume of Discharge (Avg)	0.094 MGD 357 M^3/day

If you have the need for any additional information regarding the discharge, please contact Gary Siegel at 617-861-6600.

Sincerely,

David R. Beckerman

DRB/mlr/30

cc: Allan T. Michaud
Plant Manager
W. R. Grace & Co.
Harmony Street
Adams, Massachusetts 01220

bcc: D. D. O'Rell
J. F. Murphy, Jr.
E. T. Murphy
G. W. Siegel
M. Stoler - Cambridge

LEXINGTON Polyfibron Division GRACE

To: W. J. Jolivet - Adams
A. T. Michaud - Adams

Date: November 30, 1984

From: G. W. Siegel

Subject: Town of Adams Pretreatment Requirements

cc: J. F. Murphy, Jr.
D. D. O'Rell

Regarding the letter Adams received from Joseph Fijal who is the Superintendent of the Adams treatment plant, we will have to supply Mr. Fijal with the requested monitoring reports, but we should not send them any Material Safety Data Sheets.

The EPA has regulations which require publicly owned treatment works (POTW) to develop pre-treatment programs for their industrial customers. The purpose is to reduce the amount of industrial waste which would normally flow through the plant untreated or cause a disruption of the plant's bacteria. The first part of the program, obviously, is to identify who the industries are that need to treat their discharge. The regulations require that the sampling and analysis have to be done in accordance with specified procedures and certified, but they can be done by the discharger, a consultant and an outside laboratory, or both. At this point, I think the samples can be collected at a manhole outside of the plant by either yourselves or, because I don't think it will be pleasant, a consultant. If we find we have higher than normal (meaning domestic sewage) levels of metals or BOD (which I highly doubt), we would then have to sample at the individual processes which contribute to the flow.

Concerning Mr. Fijal's second request, we have no obligation to comply. He is asking for copies of every MSDS that we sent to the DEQE on the remote chance that some of the stuff on the data sheets is showing up in the wastewater and being exposed to his operators. There is a way he can get the information if he really needs it, through the DEQE, under the Community Right-to-Know provisions of the law. I feel giving him the 200 MSDSs at this time would set a terrible precedent and put a lot of useless, but possibly damaging, information in his hands. I will write a response to the Right-to-Know section if you want.

G. W. Siegel

GWS/mlr

J F Murphy ←

Box I 232
Adams MA

THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION
DIVISION OF WATER POLLUTION CONTROL
110 TREMONT STREET
BOSTON, MASSACHUSETTS 02202

U.S. ENVIRONMENTAL PROTECTION AGENCY
ENFORCEMENT DIVISION, PERMITS BRANCH
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203

JOINT PUBLIC NOTICE OF PROPOSED COMMONWEALTH OF MASSACHUSETTS/U.S. ENVIRONMENTAL PROTECTION AGENCY REISSUANCE OF NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT(S) TO DISCHARGE INTO WATERS OF THE COMMONWEALTH OF MASSACHUSETTS UNDER CHAPTER 21, SECTION 43 OF THE MASSACHUSETTS GENERAL LAWS, AS AMENDED BY CHAPTER 546 OF THE ACTS OF 1973 AND UNDER SECTION 402 OF THE FEDERAL WATER POLLUTION CONTROL ACT (FWPCA)

PUBLIC NOTICE NUMBER: MA-90-79

PUBLIC COMMENT PERIOD: JULY 27, 1979 - AUGUST 26, 1979

APPLICANT INFORMATION

1. APPLICANT NAME: W.R. Grace & Company

MAILING ADDRESS: Harmony Street
Adams, MA 01220

APPLICATION NUMBERS: Federal App.#MA0006009
State App. #731

This facility is engaged in the production of polyfibron. The application pertains to 3 existing discharges, (average flow is 151,000 gpd), consisting of non-contact cooling water (SIC 493) to the Hoosic River (via (Flood Control Channel), a Class B watercourse, at Adams, Massachusetts. The proposed permit requires the applicant to maintain the existing uncontaminated nature of the discharge and meet a maximum temperature limitation of 83°F. This permit will expire 5 years from the effective date of reissuance.

TENTATIVE DETERMINATIONS

Tentative determinations regarding effluent limitations and other conditions to be imposed on the above NPDES permit(s) have been made by the Massachusetts Division of Water Pollution Control (DWPC) and the United States Environmental Protection Agency (EPA). The limitations and conditions imposed will assure that State water quality standards and applicable State and Federal laws will be met.

FURTHER INFORMATION

The complete application, proposed permit and other information are on file and may be inspected at the DWPC or EPA, Boston offices. Copies, obtained by calling (617)223-5061 will be made at a cost of 20¢ per page from 9:00 a.m. to 5:00 p.m., Monday through Friday.

PUBLIC COMMENTS / PUBLIC HEARINGS

Public comments on the proposed permit are invited and should be submitted in writing prior to AUGUST 26, 1979 to either the DWPC or EPA, Boston offices, at listed addresses above. Prior to such date, any person may submit a request in writing to these offices for an informal public hearing to consider the proposed permit. A hearing will be held only if the response to this notice indicates significant public interest. The application numbers should appear on the envelope and on the first page of any submitted comments. All comments received prior to the above date will be considered in the formulation of the final determinations.

Following the thirty (30) day comment period, determinations will be made by the Regional Administrator of the EPA and the Director of the DWPC with respect to each permit. Where determinations remain substantially unchanged from the tentative determinations and draft permit prepared, the Regional Administrator and Director will forward a copy of determinations to any person who has submitted written comments regarding the permit. Where determinations are substantially changed from the tenative determinations and proposed permit prepared, the Regional Administrator will provide public notice of such determinations, including a mailing to interested persons, as well as to those persons submitting written comments. Persons who feel that they may wish to request a formal adjudicatory hearing on the matter of the final permit determinations should file written comments during this thirty (30) day comment period.

Within ten (10) days of the date of receipt of the final determinations, any interested person may request an adjudicatory hearing of the Regional Administrator in accordance with the provisions of 40 C.F.R. §125.36(b) and (c), 30 FR 27081. A similar request should also be filed with the Director within thirty (30) days of the date of receipt of the final determinations in accordance with the provisions of the Massachusetts Administrative Procedures Act and the Division's Rules for the Conduct of Adjudicatory Proceedings.

Thomas C. McMahon, Director
Massachusetts Division of Water
Pollution Control

Leslie Carothers, Director
Enforcement Division
Environmental Protection Agency

GRACE

Polyfibron Division

Industrial Chemicals Group
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

June 21, 1979

Ms. Sandy Vasil
Permit Administration Section
U.S. Environmental Protection Agency
John F. Kennedy Federal Building
Boston, Massachusetts 02203

Dear Ms. Vasil:

The completed "National Pollutant Discharge Elimination System Application for Permit to Discharge - Short Form C" is hereby submitted as requested by your transmittal slip of June 8, 1979. Also enclosed is a check for $10.00 made out to the "Environmental Protection Agency".

This form should be filed with our existing NPDES Federal Permit No. MA0006009, and it is in addition to the application for "Authorization to Discharge Under the National Pollutant Discharge Elimination System" submitted by my letter of May 29, 1979 to both the Division of Water Pollution Control and the Environmental Protection Agency.

I am not returning the supplemental forms based on our telephone conversation of June 14th in which you stated that they were not necessary.

Very truly yours,

Jerry L. McAfee
Manager of Engineering

JLM/mlr

cc: Thomas C. McMahon, Director
Division of Water Pollution Control

Massachusetts Division of Water Pollution Control
Western Regional Office

T. O. Gavin - Grace, Lexington
H. A. Johnson - Grace, Adams
J. F. Murphy, Jr. - Grace, Lexington
P. F. Percy - Grace, Adams

Enclosures

410850

INDUSTRIAL CHEMICALS GROUP, W. R. GRACE & CO.
CAMBRIDGE, MASSACHUSETTS 02140

REMITTANCE ADVICE

OUR NO.	YOUR INVOICE MO.	DAY	NO.	INVOICE AMOUNT	%	DISCOUNT	NET AMOUNT
180001	06	15	5505	10 00			10 00
32-595-5				10 00			10 00

DETACH CHECK BEFORE DEPOSITING AND RETAIN THIS FOR YOUR FILES
WHEN ENDORSED THE ATTACHED CHECK IS AN ACKNOWLEDGMENT OF THE RECEIPT OF FULL PAYMENT OF THE ITEMS DESCRIBED IN THIS STATEMENT.

410850

410850

GRACE
INDUSTRIAL CHEMICALS GROUP
W. R. GRACE & CO.
CAMBRIDGE, MASSACHUSETTS 02140

TO THE ORDER OF

ENVIRONMENTAL PROTECTION AGENCY
PERMITS BRANCH ROOM 2109
JOHN F KENNEDY BUILDING
BOSTON MASS 02203

MO.	DAY	YR
06	17	75

PAY THIS AMOUNT	
$ ***10	00
DOLLARS	CENTS

THE FIRST NATIONAL BANK OF BOSTON
BOSTON, MASS. 5-39

Paul Costanzo

⑈410850⑈ ⑆011000039⑆449⑈8700⑈9

Form Approved
OMB No. 158-R0096

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
APPLICATION FOR PERMIT TO DISCHARGE - SHORT FORM C

FOR AGENCY USE

APPLICATION NUMBER								
DATE RECEIVED								
YEAR		MO.		DAY				

To be filed only by persons engaged in manufacturing and mining

Do not attempt to complete this form before reading accompanying instructions

Please print or type

1. Name, address, location, and telephone number of facility producing discharge

A. Name W. R. Grace & Co., Adams Plant

B. Mailing address

1. Street address Harmony Street
2. City Adams 3. State Massachusetts
4. County Berkshire 5. ZIP 01220

C. Location:

1. Street Same
2. City 3. County
4. State

D. Telephone No. 413 (Area Code) 743-0546

2. SIC [ ][ ][ ][ ] (Leave blank)

3. Number of employees 150

If all your waste is discharged into a publicly owned waste treatment facility and to the best of your knowledge you are not required to obtain a discharge permit, proceed to item 4. Otherwise proceed directly to item 5.

4. If you meet the condition stated above, check here ☐ and supply the information asked for below. After completing these items, please complete the date, title, and signature blocks below and return this form to the proper reviewing office without completing the remainder of the form.

A. Name of organization responsible for receiving waste

B. Facility receiving waste:

1. Name
2. Street address
3. City 4. County
5. State 6. ZIP

5. ☒ Principal product, ☐ raw material (Check one) Rubber coated printing blankets

6. Principal process coating

7. Maximum amount of principal product produced or raw material consumed per (Check one)

Basis	Amount							
	1-99 (1)	100-199 (2)	200-499 (3)	500-999 (4)	1000-4999 (5)	5000-9999 (6)	10,000-49,999 (7)	50,000 or more (8)
A. Day								
B. Month								
C. Year								X

Region I Additional Information:

1. When did this or when will this discharge begin approx. 1960 (date).
2. If this discharge began or will begin after Jan. 1, 1975, when N.A. (date) did construction (including contractual obligations) commence

8. Maximum amount of principal product produced or raw material consumed, reported in item 7, above, is measured in (Check one):

A.☐ pounds B.☐ tons C.☐ barrels D.☐ bushels E.☒ square feet

F.☐ gallons G.☐ pieces or units H.☐ other, specify _____

9. (a) Check here if discharge occurs all year ☒, or

(b) Check the month(s) discharge occurs:

1.☐ January 2.☐ February 3.☐ March 4.☐ April 5.☐ May 6.☐ June

7.☐ July 8.☐ August 9.☐ September 10.☐ October 11.☐ November 12.☐ December

(c) Check how many days per week: 1.☐ 1 2.☐ 2-3 3.☐ 4-5 4.☒ 6-7

10. Types of waste water discharged to surface waters only (check as applicable)

Discharge per operating day	Flow, operating gallons per day					Volume treated before discharging (percent)				
	0.1-999 (1)	1000-4999 (2)	5000-9999 (3)	10,000-49,999 (4)	50,000- or more (5)	None (6)	0.1-29.9 (7)	30-64.9 (8)	65-94.9 (9)	95-100 (10)
A. Sanitary, daily average					- -					
B. Cooling water, etc. daily average					X	X				
C. Process water, daily average										
D. Maximum per operating day for total discharge (all types)					X					

11. If any of the three types of waste identified in item 9, either treated or untreated, are discharged to places other than surface waters, check below as applicable. N.A.

Waste water is discharged to:	Average flow, gallons per operating day				
	0.1-999 (1)	1000-4999 (2)	5000-9999 (3)	10,000-49,999 (4)	50,000 or more (5)
A. Municipal sewer system					
B. Underground well					
C. Septic tank					
D. Evaporation lagoon or pond					
E. Other, specify					

12. Number of separate discharge points: A.☐ 1 B.☒ 2-3 C.☐ 4-5 D.☐ 6 or more

13. Name of receiving water or waters Hoosic River (via flood control channel)

14. Does your discharge contain or is it possible for your discharge to contain one or more of the following substances added as a result of your operations, activities, or processes: ammonia, cyanide, aluminum, beryllium, cadmium, chromium, copper, lead, mercury, nickel, selenium, zinc, phenols, oil and grease, and chlorine (residual). A.☐ yes B.☒ no

I certify that I am familiar with the information contained in the application and that to the best of my knowledge and belief such information is true, complete, and accurate.

Nigel I. Palmer
Printed Name of Person Signing

Vice President - Technical Services
Title

June 21, 1979
Date Application Signed

Signature of Applicant

18 U.S.C. Section 1001 provides that:

Whoever, in any matter within the jurisdiction of any department or agency of the United States knowingly and willfully falsifies, conceals, or covers up by any trick, scheme, or device a material fact, or makes any false, fictitious, or fraudulent statements or representations; or makes or uses any false writing or document knowing same to contain any false, fictitious, or fraudulent statement or entry, shall be fined not more than $10,000 or imprisoned not more than 5 years, or both.

GRACE

Polyfibron Division

Industrial Chemicals Group
W. R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

May 29, 1979

Thomas C. McMahon, Director
Division of Water Pollution Control
Leverett Saltonstall Building
Boston, Massachusetts 02202

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

Dear Sirs:

The enclosed application for "Authorization to Discharge under the National Pollutant Discharge Elimination System" is hereby submitted.

Please note the increase in flow rate for discharge 003 which is a change from the existing permit and from the draft permit enclosed with your letter of May 10, 1979. This resulted from a change in our cooling requirements which causes us to divert water from discharge 002 to discharge 003 during some seasons of the year. During the changeover between seasons, there may be a period of several days during which the higher flow rate is experienced from both discharges 002 and 003.

Yours truly,

Jerry L. McAfee
Manager of Engineering

JLM/mlr

cc: Massachusetts Division of Water Pollution Control
Western Regional Office
Draper Hall
University of Massachusetts
Amherst, Massachusetts 01002

T. O. Gavin - Grace/Lexington
H. A. Johnson - Grace/Adams
J. F. Murphy, Jr. - Grace/Lexington
P. F. Percy - Grace/Adams

Federal Permit No. MA0006009
State Permit No. 190
State Application No. 731

AUTHORIZATION TO DISCHARGE UNDER THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq; the "Act"), and the Massachusetts Clean Water Act, as amended (M.G.L.,C.21, ss26-53), W. R. Grace & Co., Adams plant

is authorized to discharge from a facility located at Harmony Street, Adams, Massachusetts 01220

to receiving waters named Hoosic River (via Flood Control Channel)

in accordance with effluent limitations, monitoring requirements and other conditions set forth in Parts I, II, and III hereof.

This permit shall become effective on 45 days after signing

This permit and the authorization to discharge shall expire at midnight, 5 years from the effective date

Signed this day of

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning effective date and lasting through expiration date the permittee is authorized to discharge from outfall(s) serial number(s) 001, 002, 003.

Such discharges shall be limited and monitored by the permittee as specified below:

	Effluent Characteristic	Discharge Limitations kg/day (lbs/day)		Discharge Limitations Other Units (Specify)		Monitoring Requirements Measurement Frequency	Monitoring Requirements Sample Type
		Daily Avg	Daily Max	Daily Avg	Daily Max		
001	Flow-m^3/Day (MGD)	-	-	250 m^3/day (.066 MGD)	262 (.069)	Quarterly	-
002	Flow-m^3/Day (MGD)	-	-	304 m^3/day (.080 MGD)	349 (.092)	Quarterly	-
003	Flow-m^3/Day (MGD)	-	-	304 m^3/day (.080 MGD)	349 (.092)	Quarterly	-
001 002 003	Temperature °C (°F)			shall not exceed 28°C (83°F)		Quarterly	Report maximum of 3 grab samples

The pH shall not be less than 6.0 standard units nor greater than 8.5 standard units and shall be monitored quarterly (report range of 3 grab samples)

There shall be no discharge of floating solids or visible foam in other than trace amounts.

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s): points of discharge

C. MONITORING AND REPORTING

1. *Representative Sampling*

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.

2. *Reporting*

Monitoring results obtained during the previous 2 quarters shall be summarized for each quarterand reported on a Discharge Monitoring Report Form (EPA No. 3320-1), postmarked no later than the 28th day of the month following the completed reporting period. The first report is due on December 28, 1979 . Duplicate signed copies of these, and all other reports required herein, shall be submitted to the Regional Administrator and the State at the following addresses:

U.S. Environmental Protection Agency
Region I
JFK Building, Room 2109
Boston, Massachusetts 02203

M.D.W.P.C.
Western Regional Office
Draper Hall
University of Massachusetts
Amherst, Massachusetts 01002

3. *Definitions* see attached definitions page

a. The "daily average" discharge means the total discharge by weight during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the daily average discharge shall be determined by the summation of all the measured daily discharges by weight divided by the number of days during the calendar month when the measurements were made.

b. The "daily maximum" discharge means the total discharge by weight during any calendar day.

4. *Test Procedures*

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act, under which such procedures may be required.

5. *Recording of Results*

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

a. The exact place, date, and time of sampling;

b. The dates the analyses were performed;

c. The person(s) who performed the analyses;

d. The analytical techniques or methods used; and

e. The results of all required analyses.

6. *Additional Monitoring by Permittee*

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report Form (EPA No. 3320-1). Such increased frequency shall also be indicated.

7. *Records Retention*

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed and calibration and maintenance of instrumentation and recordings from continuous monitoring instrumentation shall be retained for a minimum of three (3) years, or longer if requested by the Regional Administrator or the State water pollution control agency.

A. MANAGEMENT REQUIREMENTS

1. *Change in Discharge*

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansions, production increases, or process modifications which will result in new, different, or increased discharges of pollutants must be reported by submission of a new NPDES application or, if such changes will not violate the effluent limitations specified in this permit, by notice to the permit issuing authority of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited.

2. *Noncompliance Notification*

If, for any reason, the permittee does not comply with or will be unable to comply with any daily maximum effluent limitation specified in this permit, the permittee shall provide the Regional Administrator and the State with the following information, in writing, within five (5) days of becoming aware of such condition:

a. A description of the discharge and cause of noncompliance; and

b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.

3. *Facilities Operation*

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit.

4. *Adverse Impact*

The permittee shall take all reasonable steps to minimize any adverse impact to navigable waters resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

5. *Bypassing*

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except (i) where unavoidable to prevent loss of life or severe property damage, or (ii) where excessive storm drainage or runoff would damage any facilities necessary for compliance with the effluent limitations and prohibitions of this permit. The permittee shall promptly notify the Regional Administrator and the State in writing of each such diversion or bypass.

Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering navigable waters.

7. *Power Failures*

In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

a. In accordance with the Schedule of Compliance contained in Part I, provide an alternative power source sufficient to operate the wastewater control facilities;

or, if such alternative power source is not in existence, and no date for its implementation appears in Part I,

b. Halt, reduce or otherwise control production and/or all discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

B. RESPONSIBILITIES

Right of Entry

The permittee shall allow the head of the State water pollution control agency, the Regional Administrator, and/or their authorized representatives, upon the presentation of credentials:

a. To enter upon the permittee's premises where an effluent source is located or in which any records are required to be kept under the terms and conditions of this permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any monitoring equipment or monitoring method required in this permit; and to sample any discharge of pollutants.

2. *Transfer of Ownership or Control*

In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Regional Administrator and the State water pollution control agency.

3. *Availability of Reports*

Except for data determined to be confidential under Section 308 of the Act, all reports prepared in accordance with the terms of this permit shall be available for public

inspection at the offices of the State water pollution control agency and the Regional Administrator. As required by the Act, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the Act.

4. *Permit Modification*

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:

a. Violation of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. *Toxic Pollutants*

Notwithstanding Part II, B-4 above, if a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the Act for a toxic pollutant which is present in the discharge and such standard or prohibition is more stringent than any limitation for such pollutant in this permit, this permit shall be revised or modified in accordance with the toxic effluent standard or prohibition and the permittee so notified.

6. *Civil and Criminal Liability*

Except as provided in permit conditions on "Bypassing" (Part II, A-5) and "Power Failures" (Part II, A-7), nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

7. *Oil and Hazardous Substance Liability*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311 of the Act.

8. *State Laws*

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Act.

9. *Property Rights*

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

10. *Severability*

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

PART III

OTHER REQUIREMENTS

1. Discharges 001, 002 and 003 shall consist solely of uncontaminated cooling water whose physical and biochemical properties remain unaltered from those of the intake water, except for the addition of heat.

2. The combined thermal effect of the discharges shall not cause the temperatures in the receiving stream to rise by more than 4°F (2.2°C) or to exceed 68°F (20°C).

LIST OF MATERIAL

ITEM	QUAN.	SIZE	DWG. NO.	MAT'L	DESCRIPTION

MODEL	A	B	C	D	E	F	G	H	J	K	L	M	N	P	R	S	T	U	V
536	3'-0"	4'-0"	6'-5"	7'-10"	9'-4"	13'-4"	4'-0"	3'-11"	2'-6"	2'-6"	8'-4"	2'-0"	9'-6"	2'-2"	1'-10"	2'-1"	2'-5"	1'-6"	12"
548	4'-0"	3'-8"	7'-2"	8'-10"	11'-4"	16'-4"	5'-0"	4'-5"	3'-0"	2'-9"	7'-11"	2'-0"	3'-11"	2'-2"	1'-10"	2'-1"	2'-0"	1'-6"	12"
554	4'-6"	4'-5"	7'-7"	9'-4"	12'-5"	17'-11"	5'-6"	4'-8"	3'-3"	2'-11"	8'-9"	2'-0"	11'-1"	2'-4"	2'-4"	2'-0"	3'-5"	2'-6"	14"
572	6'-0"	4'-4"	9'-0"	12'-2"	15'-4"	22'-4"	7'-0"	6'-1"	4'-3"	2'-11"	9'-5"	2'-7"	12'-6"	3'-4"	3'-0"	3'-7"	4'-11"	2'-6"	18"
584	7'-0"	5'-0"	9'-10"	13'-2"	17'-4"	25'-4"	8'-0"	6'-7"	4'-3"	3'-3"	10'-1"	2'-7"	12'-11"	3'-6"	3'-1"	3'-2"	4'-11"	2'-6"	18"
596	8'-0"	6'-0"	11'-4"	14'-2"	20'-10"	29'-10"	9'-0"	7'-1"	5'-2"	4'-3"	11'-8"	2'-9"	14'-6"	4'-1"	4'-4"	5'-3"	5'-8"	2'-10"	22"
512	10'-0"	5'-11"	14'-4"	18'-2"	25'-0"	36'-0"	11'-0"	9'-1"	6'-6"	5'-3"	12'-6"	3'-7"	15'-7"	4'-8"	4'-4"	3'-4"	5'-8"	2'-10"	22"

MODEL	SCFM (2 TANK UNIT)	SCFM (3 TANK UNIT)	BLOWER H.P. (2 TANK UNIT)	BLOWER H.P. (3 TANK UNIT)	DAMPER	VAPOR VALVE (BUTTERFLY)	STEAM VALVE	WATER VALVE HT. EXCH.	PROCESS/EXHAUST AIR DUCTING CONNECTION	SHIPPING WHT (2 TANK UNIT)	SHIPPING WHT (3 TANK UNIT)	RECOMMENDED DUCTING SIZE (2 TANK UNIT)	RECOMMENDED DUCTING SIZE (3 TANK UNIT)
536	800	1300	3	5	12"	2"	3/4"	3/4"	12" DIA	4000#	5800#	12"	12"
548	1260	2200	3	5	12"	2½"	1¼"	3/4"	12" DIA	4775#	6910#	12"	12"
554	1700	3000	15	20	12"	3"	1¼"	3/4"	12" DIA	6400#	9375#	12"	14"
572	3000	5500	20	30	14"	4"	1¼"	1¼"	14" DIA	9950#	15000#	14"	18"
584	3300	7500	30	40	14"	4"	2"	2"	14" DIA	14025#	20150#	14"	22"
596	5000	10000	40	50	18"	6"	3" B.F.	3" B.F	18" DIA	20300#	29700#	18"	24"
512	8000	16000	50	100	24"	6"	3" B.F.	3" B.F.	24" DIA	28700#	42350#	24"	30"

NOTES:
1. ALL DIMENSIONS APPROXIMATE AND SUBJECT TO CHANGE WITHOUT NOTICE
2. DIMENSION TOLERANCE ± 2"

APPROVED

Department Of Environmental Quality Engineering

By [signature] Date 12-31-85

SYM	DATE	SIGNATURE	DESCRIPTION OF CHANGES	E.C.N.

MODEL 500

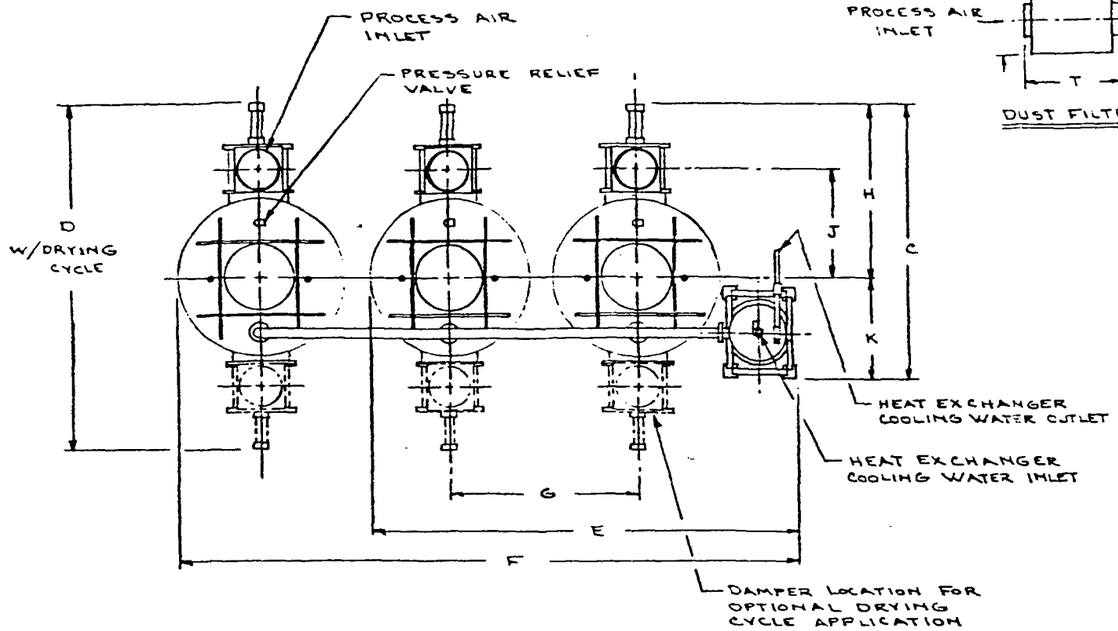
UNLESS OTHERWISE SPECIFIED

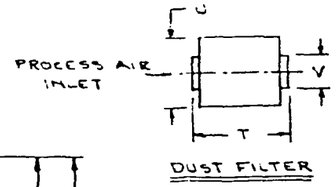
VIC MANUFACTURING COMPANY

D APD-431

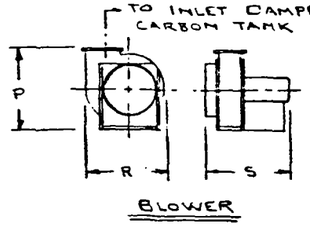
APD-431 F

LIST OF MATERIAL					
ITEM	QUAN.	SIZE	DWG. NO.	L	DESCRIPTION

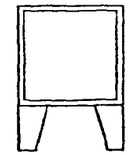




DUST FILTER

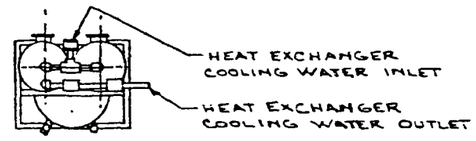


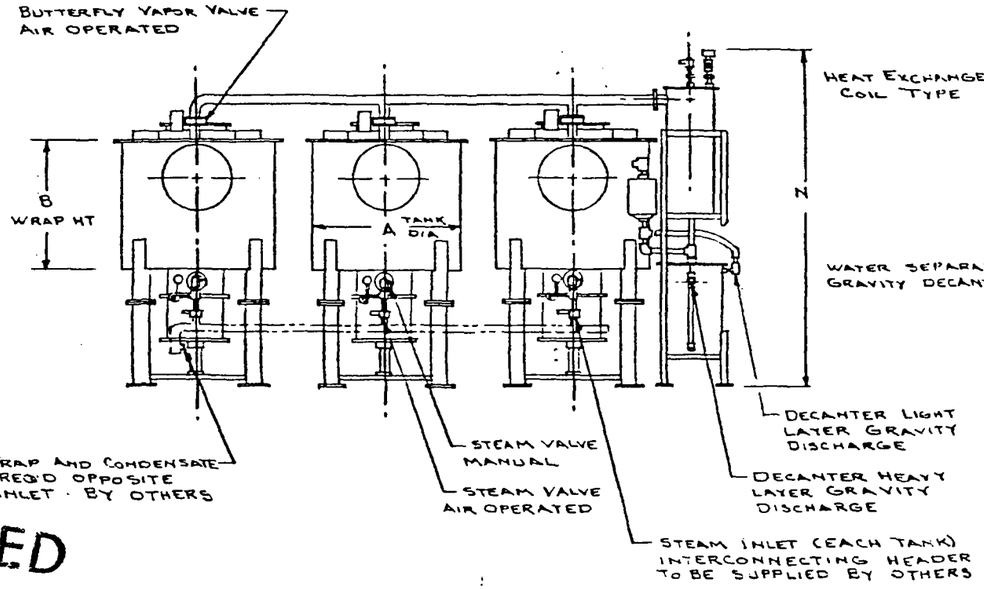
BLOWER

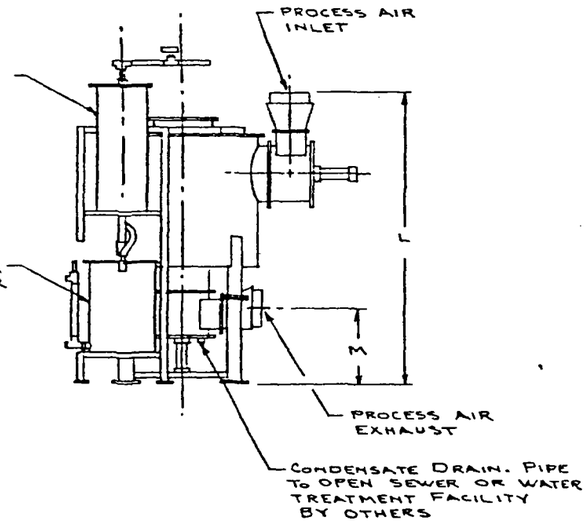


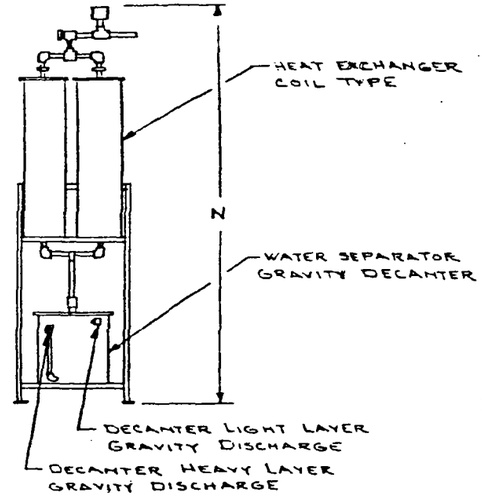
STANDARD CONTROL CABINET
68" H. x 38" W x 12" DP

HEAT EXCHANGER AND DECANTER ARRANGEMENT FOR 536 AND 512









APPROVED

Department Of Environmental Quality Engineering

ABK by SBT Date 12-31-85

SYM	DATE	SIGNATURE	DESCRIPTION OF CHANGES	E.C.N.
F	1-12-84	LDL	REVISED	—
E	1-16-83	SCH	REVISED CFM	—
D	4-1-82		[illegible]	—

MODEL 500

UNLESS OTHERWISE SPECIFIED
1. DIMENSIONS ARE IN INCHES.
2. SHARP EDGES SHALL BE BROKEN 010 R.
3. FINISHED PART SHALL BE FREE OF BURRS.
4. LAWS OR ORDINANCES UNLESS OTHERWISE SPECIFIED -

DECIMALS | FRACTIONS | ANGLES ½°

VIC MANUFACTURING COMPANY MINNEAPOLIS MINN.

D APD-431 F

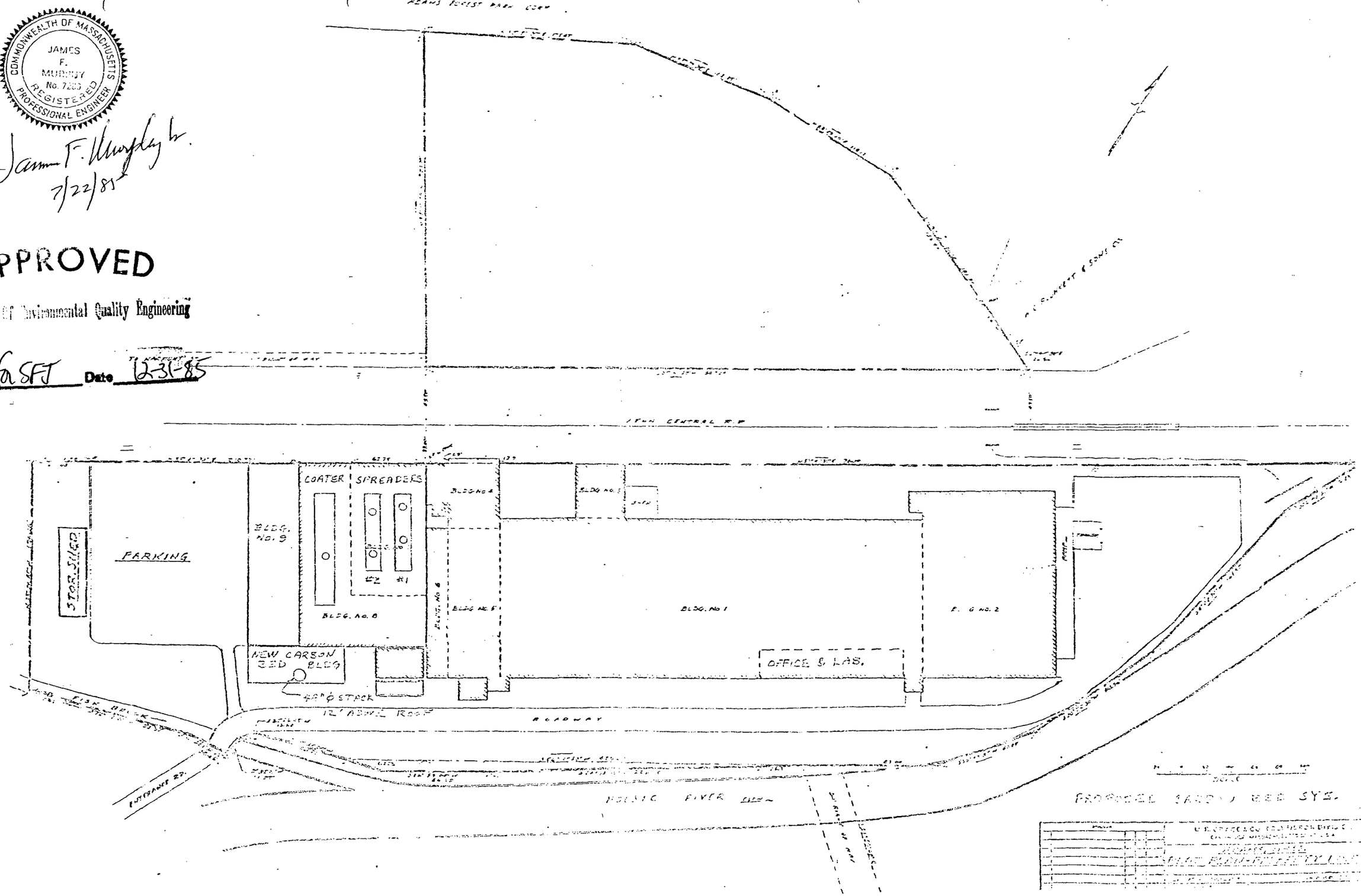
COMMONWEALTH OF MASSACHUSETTS
JAMES F. MURPHY
No. 7265
REGISTERED PROFESSIONAL ENGINEER

James F. Murphy Jr.
7/22/85

APPROVED

Department of Environmental Quality Engineering

PBL for SFT Date 12-31-85



PURCHASE ORDER

Polyfibron Division
W.R. Grace & Co.

GRACE

This number must appear on all invoices, B/L's, packing lists and related correspondence.

▶ P 21413-11

JK

☒ HARMONY ST. ADAMS, MA. 01220 ☐ 51 INDEPENDENCE RD. ACTON, MA. 01720 ☐ PHILLIP LEE DR. FULTON IND. PK. ATLANTA, GA. 30336 ☐ 62 WHITTEMORE AVE. CAMBRIDGE, MA. 02140 ☐ 55 HAYDEN AVE. LEXINGTON, MA. 02173 ☐ HIGHWAY 60E, RT 1 OWENSBORO, KY. 42301 ☐ 45 N. FOURTH ST. QUAKERTOWN, PA. 18951

JLG

Please Note! SHIP GOODS & RENDER YOUR INVOICE TO THE LOCATION CHECKED ABOVE, UNLESS OTHERWISE NOTED AT RIGHT.

SHIP TO

BILL TO

TO: VIC Manufacturing Co.
1620 Central Ave. NE
Minneapolis, MN 55413

W. R. Grace & Co.
55 Hayden Avenue
Lexington, MA 02173
Attn-Julie Harwood

PURCHASE ORDER DATE	OUR REQUISITION NO.	TERMS:			VENDOR NO.	F.O.B.
7/19/85	81844	SEE BELOW				Minneapolis, MN
TO ARRIVE BY:	**ROUTING:**	**SUBJECT TO STATE & LOCAL SALES & USE TAX** ▶	**YES**	**NO**	**TAX EXEMPTION NO.**	**DELIVER TO**
11/11/85	Express, Special Truck			X	135-114-230	D.S. Johnstone

W.R. GRACE & CO. ACCOUNT NUMBER	ITEM	QUANTITY ORDERED	PLEASE FURNISH THE MATERIAL AND/OR SERVICES SPECIFIED BELOW	UNIT	UNIT PRICE	ITEM AMOUNT
			CONFIRMED WITH TOM CANNON ON 7/2/85.			
X708703474	1	1	VIC Model 512-A4 Solvent Recovery System with Mode 3 International Sensor Analyzer, but without blower system or controls. System design - 20,000 CFM, per VIC proposal No. 039453, Addendum No.1 dated July 2, 1985. Vessels for up to 7200 lbs. of carbon.			$227,800.00
			TERMS:			
			5% Down with Order. 20% On Approval of Prints. 60% Upon Shipment. 15% On Acceptance.			

TJ 9/15

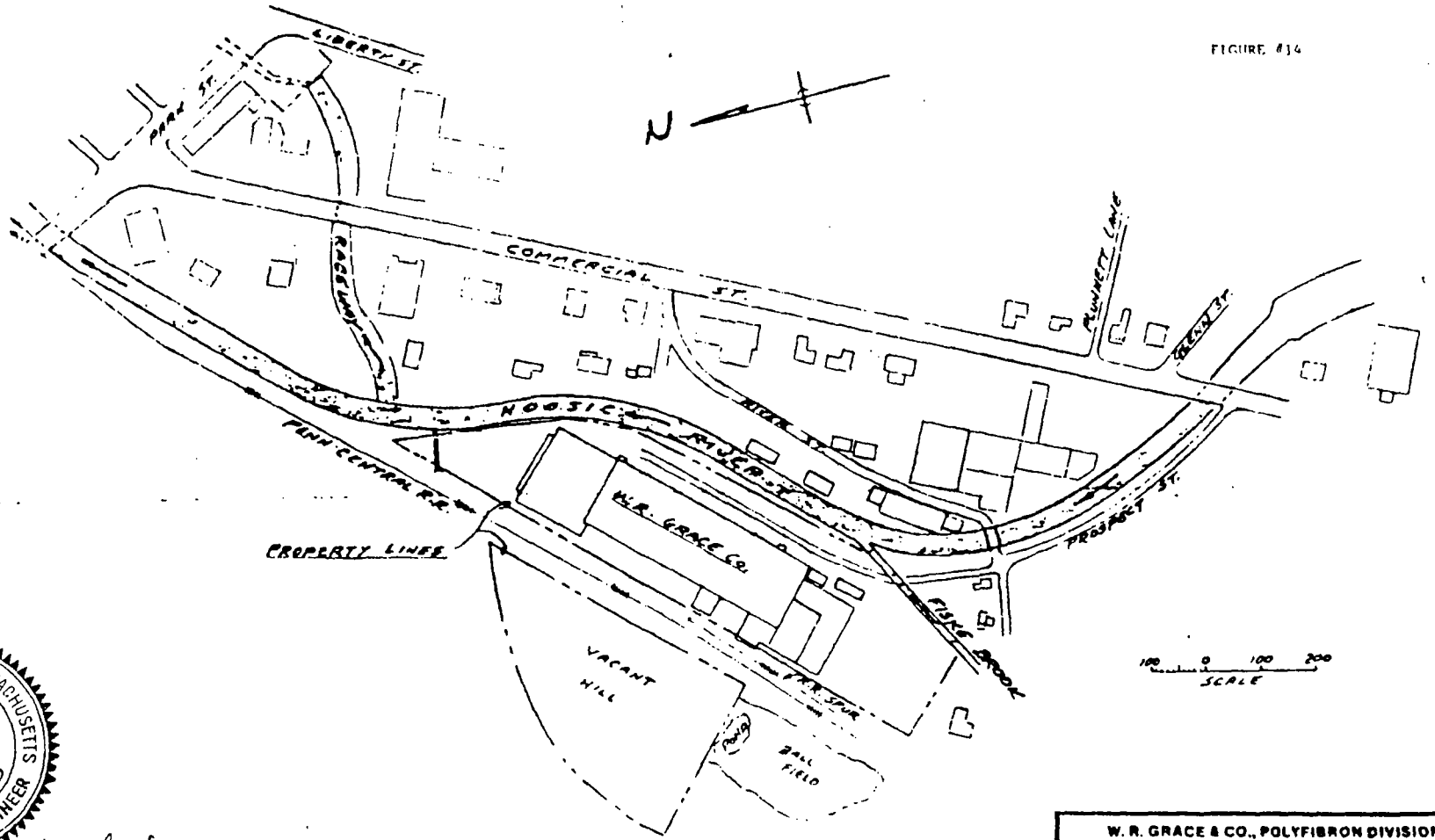
THE ACKNOWLEDGMENT COPY OF THIS PURCHASE ORDER MUST BE SIGNED, DATED, AND RETURNED PROMPTLY.

By _____

NOTICES SENT	NOTICES RECEIVED

MATERIAL CODE

FIGURE #14



COMMONWEALTH OF MASSACHUSETTS
JAMES F. MURPHY
No. 7289
REGISTERED PROFESSIONAL ENGINEER

James F. Murphy Jr
7/22/85

W. R. GRACE & CO., POLYFIBRON DIVISION
CAMBRIDGE MASSACHUSETTS 02140 U.S.A.

GENERAL AREA MAP

ADAMS PLANT ADAMS, MASS.

DRAWN BY MK DATE 4-4-72

ADSORPTION DESIGN DATA SHEET

1. General Information

   a. Firm Name: W. R. Grace & Co. Polyfibron Division

   b. Address: Harmony St. Adams, MA 01722

   c. Adsorber Manufacturer: Vic Manufacturing Company

   d. Model No. and/or description (see No. 7) 512 A4

2. Adsorbate Information

   a. Total Volume of Process Exhaust to Adsorber(s): 21,300 ACFM

   20,000 CSFM

   (1) Inlet moisture content AMBIENT lb/min

   (2) If necessary, how will process stream be cooled? N/A

   b. Volatile Organic Compound(s) to be Absorbed (common and generic names for each.) (See No. 5) Toluene

Product	% of stream	VOC A	VOC B	VOC C	VOC D	VOC E	VOC F	(% OF EACH)
1.		90%	10%					
2.								
3.								
4.								

Waste Stream to the carbon bed, at all times will be toluene and 1-nitropropane, in air, at or below 25% of the lower explosive limit (LEL) LEL for toluene is 1.27% by volume, in air. The VOC in the waste stream will be 90% toluene and 10% 1-nitropropane.

   C. Concentration in Air Stream, to be Treated ____ lb/ft^3 2500 PPM

   d. Inlet Temperature 105 °F (give range, if applicable)

   e. Outlet Temperature 105 °F (give range, if applicable)

   f. Is air stream to be Treated Free from Contaminants? no.

   (1) If "No" indicate type of control device to be used upstream of adsorber and submit applicable design data sheet.

International sensor technology exhaust gas analyzer

F. Process exhaust direction through adsorber (up/down)(See No. 1)
Down

3. Adsorber Information

a. Materials of Construction 304 S.S.

b. Type of Adsorbent including base material and mesh size (if carbon indicate grade): 4X10 BPL Calgon Activated Carbon Anthracite Coal Base

c. Surface Area of Adsorbent: 1000 M^2/G

(1) Pore size distribution: 80% 5-20 / 20% + 20 Angstroms

d. Polarity of Adsorbent: Non Polar

e. Efficiency of Removal of VOC (estimated): 90 %

f. No. of Vessels 4 Beds per Vessel 1 Surface Area per Bed 78.54 FT^2

g. Amount of Adsorbent per Bed: 5000 lbs

h. Depth of Bed: 2.1 ft

i. Surface Velocity across Bed: 84.9 FPM (3 BEDS ON LINE @ 20,000 SCFM)

j. Pressure Drop across Unit: _____ mmHg 15 in. H_2O

k. Bed Volume: 166.5 ft^3

l. System Designed to be Pressurized for Greater Efficiency? no

(1) If "Yes", indicate system pressure: N/A

m. Hours, Days of Operation (per production line) 24 hrs/day 5 days/week 48 weeks/year

n. Intermittent or Continuous Operation? Intermittent

(1) If intermitent, how will break point achievement be measured? International Sensor Technology Exhaust Gas Analyzer

(2) If continuous, time required to reach break point: N/A mins

o. Regenerative or Non-regenerative System? Regenerative

(1) If regenerative:

(a) How will saturated adsorbent be stripped? Steam

(If steam indicate lb/hr 1600)

i. Temperature 250 °F and Pressure 15 PSI

ii. Is direction opposite to adsorption (see No. 7)? Yes

(b) Time required for adequate stripping: 60 min.

(c) How will bed be cooled and dried prior to reuse? Process air stream

(d) What is downstream design (See No. 7)_____

(2) If non-regenerative, how will contaminated absorbent be disposed of (Include assigned sites, contracts with licensed haulers, etc)? N/A

4. Will VOC(s) be reused? Yes

(a) If "Yes" how collected (and seperated) See No. 7)?

Decanter and storage tank

(b) If "No" how disposed of (assigned site, contract with licensed hauler, etc)? N/A

5. Provide Pertinent Data re: Adsorbate with Adsorbent: Chemical Activity and Retentivity of Toluene has chemical activity of 37%, by weight and and retentivity of 25% by weight.

6. Indicate how unit will be Winterized: Inside building

7. Provide Flow Diagram for Adsorption Process, including flow rates and temperatures, bed arrangement, instrumentation, etc.

8. Provie Standard Operation Procedure and Standard Maintenance Procedure for process.

P.E. Stamp:

COMMONWEALTH OF MASSACHUSETTS
JAMES F. MURPHY No. 7289 REGISTERED PROFESSIONAL ENGINEER

James F. Murphy Jr
7/19/85

Submitted By: James F. Murphy, Jr.

Of: W. R. Grace & Co.

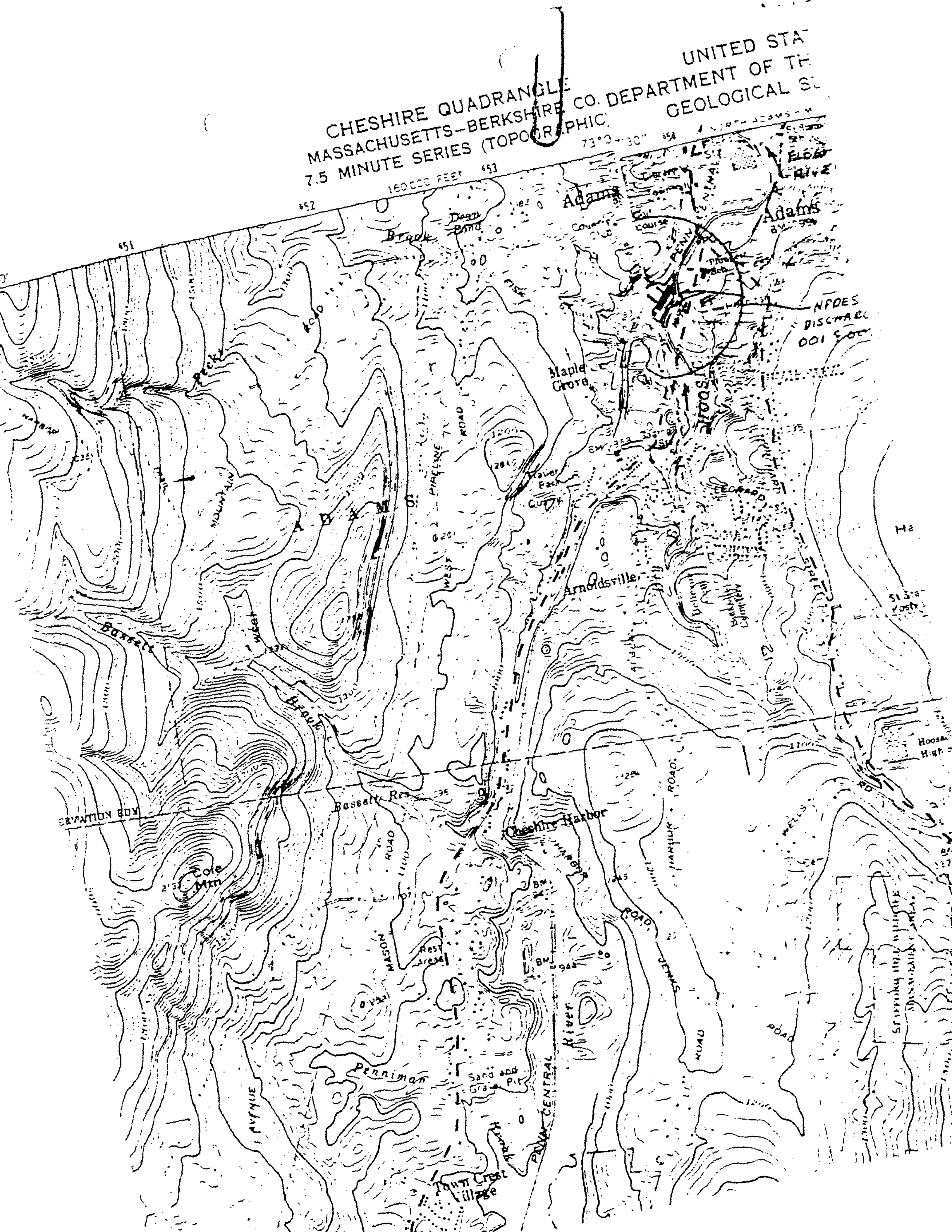
Polyfibron Division

Date: July 19. 1985

APPROVED

[illegible] Environmental Quality Engineering

JBK for SFT Date 12-31-85


UNITED STA
CHESHIRE QUADRANGLE
MASSACHUSETTS–BERKSHIRE CO.
DEPARTMENT OF TH
7.5 MINUTE SERIES (TOPOGRAPHIC)
GEOLOGICAL S
Adams
Dean Pond
Brook
Maple Grove
NPDES
DISCHARGE
001
ADAMS
MOUNTAIN
PIPELINE
WEST ROAD
Arnoldsville
Bassett
Brook
Bassett Res
Cheshire Harbor
Cole Mtn
HARBOR ROAD
MASON
ROAD
Rest Area
BM 944
River
Penniman
Sand and Gravel Pit
AVENUE
CENTRAL
Town Crest Village
Hoosac High

VIC Hydrocarbon vapor adsorption systems

ACTIVATED CARBON TYPE

- Chemical Processing
- Surface Coating
- Printing
- Vapor Degreasing
- Other Solvent Applications

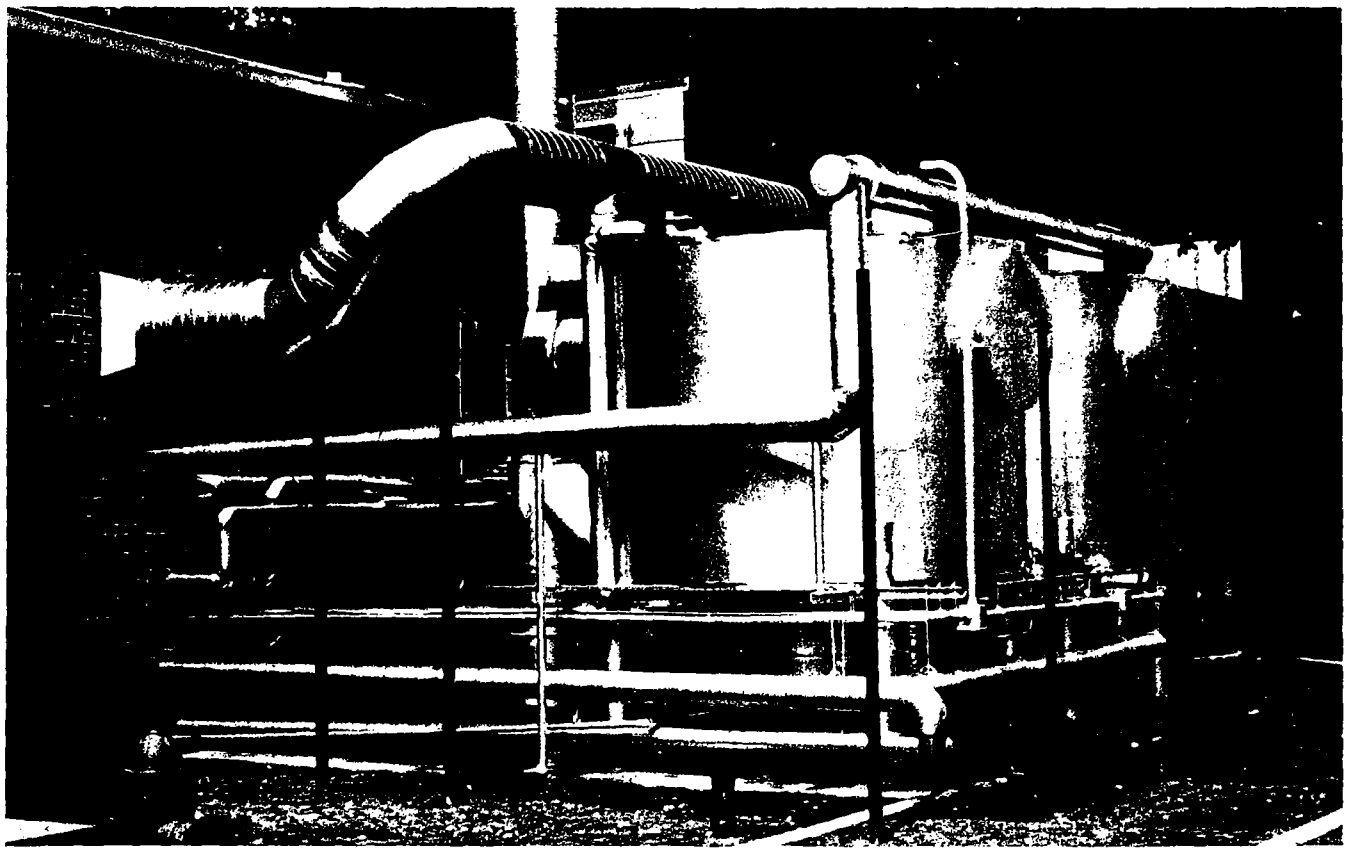
The Vic 500 series is widely used in typical applications up to 25,000 CFM. Vic's unique design eliminates carbon attrition. The small modular units provide system flexibility. A 500 system can be easily installed in a minimum amount of space. And Vic's pre-engineering reduces the cost to a customer.

The carbon adsorption process utilized in the Vic 500 series meets the requirements of EPA and OSHA. Solvents are removed from the vapor-laden air stream with up to 98% efficiency. Among those readily recovered are Hydrocarbon solvents from various classifications such as: fluorocarbons, chlorinates, aliphatics, aromatics, alcohols, ketones, esters, ethers, or combinations of these solvents.

The 500 process produces clean air both inside and out of the plant. In doing so, it improves neighborhood relations, helps reduce absenteeism and maintains employee efficiency. It also conserves energy and vital raw materials.

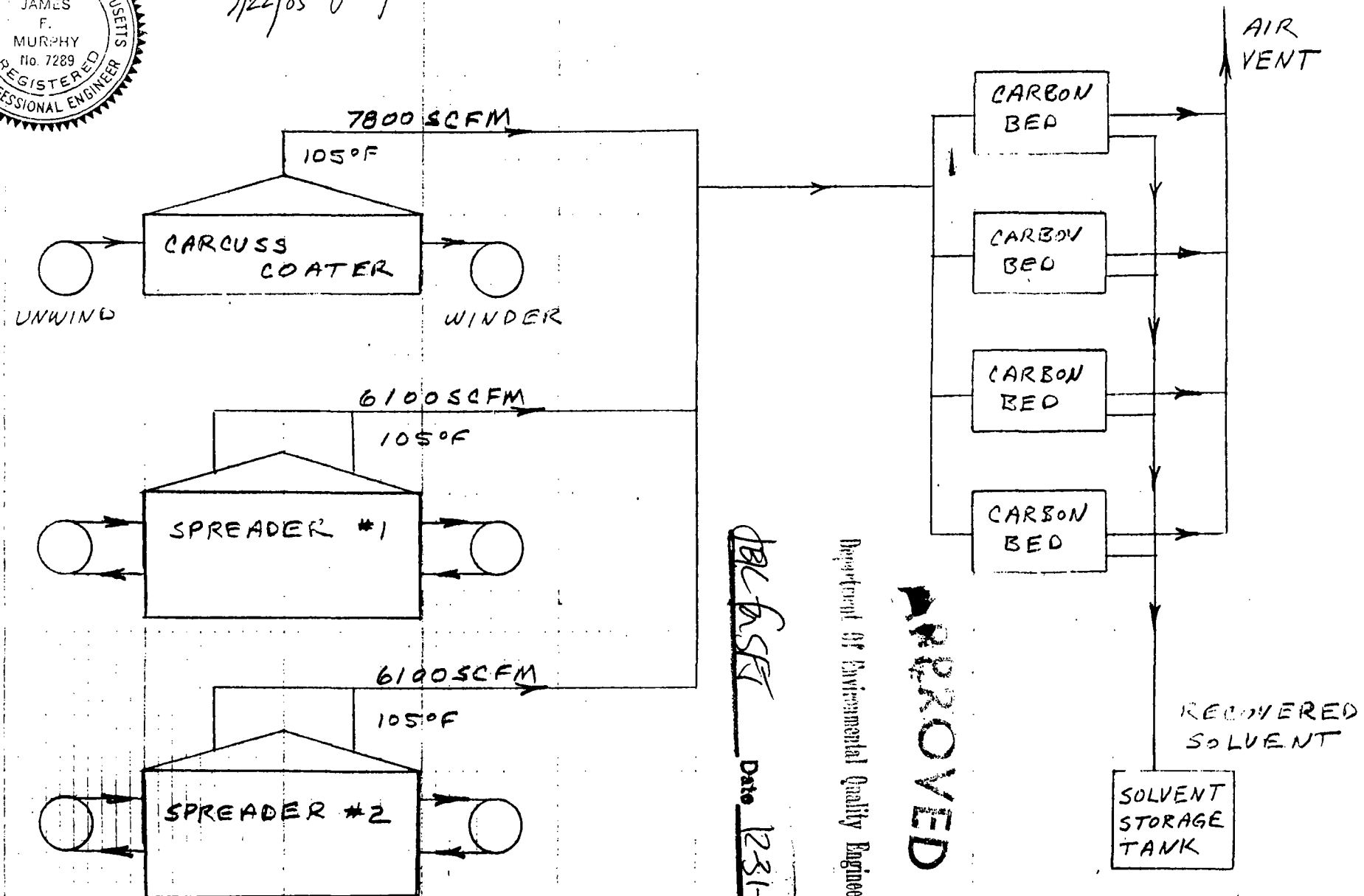
500 systems are available in a wide variety of construction materials.

American Designed, Manufactured and Serviced.



COMMONWEALTH OF MASSACHUSETTS
JAMES F. MURPHY No. 7289 REGISTERED PROFESSIONAL ENGINEER

James F. Murphy Jr
7/22/85



SOLVENT RECOVERY SYSTEM

APPROVED
Department of Environmental Quality Engineering
Date 12-31-85

5/6/85

MAY 6 1985

VIC MANUFACTURING COMPANY

Industrial Division
Hydrocarbon vapor adsorption systems

APPROVED

Department Of Environmental Quality Engineering

JBK for SFT Date 12-31-85

PROPOSAL
AND PURCHASE AGREEMENT
PROJECT NO. 03945-3

May 2, 1985

617/861-6600

W. R. Grace & Company
Polyfibron Division
55 Hayden Avenue
Lexington, MA 02173

ATTENTION: Mr. Don Johnstone, Engineering

Dear Mr. Johnstone:

At your request, we are pleased to requote you on a Solvent Recovery System for the Adams plant process conditions.

PROCESS CONDITIONS:

Exhaust Air	0 to 20,000 SCFM, 70° to 105°F., ambient pressure and R.H.
Solvent Discharge	Maximum 400 lbs/hr 90% Toluene, 10% 1-Nitropropane
Contamination	Ambient dust, talc.
Special Plant Conditions	550 Volt, 60 HZ, 3 PH current.

VIC EQUIPMENT PROPOSED:

One VIC Model 512 A4 Adsorption System consisting of:

1. Four vertical factory insulated carbon vessels.
2. Four sets of pneumatic dampers and valves.
3. Activated carbon as required.
4. ~~Blower and motor assembly with automatic inlet vane control~~.
5. Process air filter assembly.

6. Heat exchanger for steam and solvent condensing.
7. Condensate gravity decanter.
8. Fire alarms and deluge system.
9. A NEMA 12 control cabinet for remote safe area mounting.
10. One NEMA 12 auto transformer type motor starter for remote safe area mounting.

ADSORBER SPECIFICATIONS:

Carbon Vessels	Four (4) 120" diameter vertical vessels of 10 gauge 304L stainless steel.
Carbon Supports	12 gauge perforated 304L stainless steel.
Carbon Charge	5000 lbs/vessel 4 x 10 mesh, 30 lbs/cu.ft. density.
Condenser (Heat Exchanger)	Coil and shell type, 304L stainless construction.
Vapor Lines to Valves to Condenser	VIC design 304L stainless construction.
Process Air Inlet & Exhaust Ducting	No ducting included.
Decanter	Single stage gravity type, 304L stainless steel construction.
Damper & Valve Controls	Pneumatic NEMA 7R solenoids vessel mounted.
Pneumatic Tubing	Polypropylene.
Process Air Dampers	VIC designed valves with 304L stainless steel seats and vessel side parts. Housings are mild steel with phenolic lining. Two (2) per vessel.
Gasketry	TEFLON or VITON.
Controls	NEMA 12 control cabinet is supplied for remote safe area mounting, General Electric Series One programmable controller. Cabinet minimum 3 ft. above grade.
~~Blower Specs~~	~~100 HP explosion proof motor, spark resistant type "C" blower, 20,000 CFM @ 2" Neg. W.C.~~
~~Starter~~	~~The NEMA 12 auto transformer type.~~
Exhaust Gas Analyzer (Optional at extra cost)	International Sensor Technology Exhaust Gas Analyzer with recorder and cabinet.
~~Airflow Control~~	~~Automatic vane damper with anubar and indicating controller will automatically adjust airflow from 6000 to 20,000 CFM as required by the process.~~
Carbon Vessel Insulation	2" fiberglass with protective mild steel covering.

Air Filter	FARR 30-30 medium efficiency slide out disposable media filters in a epoxy lined mild steel housing with transitions for easy connection to round ducting.
Finish	Ferrous steel is painted VIC industrial gray over zinc chromate iron oxide primer.
Approx. Physical	50' L x 12' W x 12' H. Approx. 50,000 lbs.

UTILITIES REQUIRED:

Electricity	100 HP/550 Volt/60 HZ/3 PH.
Steam Saturated at 15 PSIG	Demand 1600 pounds/hour during 60 minute desorption.
Condenser Cooling Water Based on 35°F. $\triangle$ T.	105 GPM at 85°F. or cooler max. consumption.
Compressed Air	15 CFH at 80 PSIG.

ADSORBER OPERATION:

System is provided with two modes of operation as standard equipment.

MODE 1: Fully automatic. System will be provided with adjustable timers to control the length of time for each of the basic cycles; adsorb and desorb. For maximum conditions of 400 lbs/hour solvent loading, the recommended cycle is 60 minutes adsorb and 60 minutes desorb. Three vessels are always in adsorption while the fourth is desorbing.

MODE 2: VIC systems have a manual switch for each cycle so that the automatic timer controls can be overridden.

OPTIONAL MODE 3: An International Sensor Technology Exhaust Gas Analyzer with recorder can be furnished, and by selection of a control panel switch, will desorb the machine based on hydrocarbon present in the exhaust rather than by arbitrary time. This device optimizes utility consumption for processes with input variations in solvent loading. See pricing.

CONTROL FEATURES:

1. A ketone operation shutdown programmer will be supplied.
2. Condenser water outlet temperature sensor is provided to alarm a NO WATER or LOW FLOW condition. These controls shut down the steam to prevent solvent loss.
3. The compressed air circuit is provided with a LOW AIR PRESSURE alarm to indicate the point at which valves or dampers may fail to operate properly.

4. The system dampers and valves are normally closed when in shutdown position to limit oxygen supply to carbon. This feature requires a 24 hour/day compressed air supply.
5. Temperature probes set to alarm at 275°F. are placed above and below the carbon to alarm a possible fire condition.
6. Pneumatic carbon quench valves are provided with control panel switches.
7. As an option at extra cost, we can provide a process air bypass damper and a programmed sequence for the carbon quench valves. This feature completely automates the fire quenching procedures. See pricing.

SOLVENT RECOVERY:

The proposed system includes a single stage gravity decanter which will separate the solvent and steam condensate mixture into two layers by specific gravity to their solubility levels.

OPTIONAL BAROMETRIC DAMPER:

As an option. we can supply the system with a barometric damper that will take in 6000 CFM of indoor ambient air to satisfy the carbon adsorption system when there is no air flowing from the process. See pricing.

EFFICIENCY:

The system proposed is guaranteed to operate at not less than 90% average removal efficiency.

SPECIFICATION CHANGES:

Because of the special engineering work required by VIC Manufacturing Company, the seller reserves the right to change minor details of constructions shown herein. Any modifications to the construction or utilities will be shown on our Quotation Prints for Approval which will be forwarded to the purchaser before production has started. In the event purchaser requires a change in specifications after engineering has started, after materials have been ordered, or after production has started, the purchase price and/or terms will be appropriately revised. Any preinstallation work done before receipt of Quotation Prints for Approval is done at the risk of the purchaser.

EXTENT OF ASSEMBLY:

System is disassembled as necessary for truck shipment. All fittings will be flanged or pipe assembled. Carbon is furnished, but must be inserted at the job site.

FURNISHED BY SELLER:

1. Equipment as described.
2. System prints, instructions and parts lists.
3. Quotation Approval Prints to be sent out prior to fabrication of system.
   NOTE: Approval Prints will be at the technical level of the enclosed samples and cover VIC products only. Approval Prints do not include installation designs. More technical data and drawings are available by special quotation.

   VIC Manufacturing welcomes and encourages customer's engineering staff to meet with VIC personnel to review quotation approval drawings. Whenever this is necessary, it is suggested that this meeting be held at the VIC office.

   In the event that the customer would like VIC to send engineers to their location, VIC will be happy to accommodate you. Should this be necessary, the customer would be expected to pay all out-of-pocket travel expense for our personnel.

* 4. Start-up by VIC factory trained personnel for up to five (5) working days, including travel time. Additional days optional by arrangement.

5. One year warranty, as outlined on the reverse side of this page.

* 4A. We will provide factory personnel for an additional five (5) day field trip to supervise customer placement and assembly at the time of equipment arrival.

TO BE FURNISHED BY PURCHASER:

1. Freight and Rigging from factories to installation site.
2. Site preparation.
3. Suitable weather protection.
4. Design functions of installation.
5. Assembly of system.
6. Installation of furnished carbon if necessary.
7. Connection of utilities including battery limits, piping and wiring.
8. Ductwork, as required.
9. Exhaust stack or stacks.
10. Installation of auxiliary components and interrelated piping.
11. Utilities, as required.
12. Space as required.
13. Purchaser to be responsible for proper installation and operation of equipment and conformance with all state and local codes.
14. State and local taxes as applicable.

PROJECTED DELIVERIES:

Quotation Approval Prints:	2 to 3	weeks after receipt of purchase order.
Machinery Shipment:	13 to 15	weeks after receipt of signed Quotation Approval Prints.

NOTE: Delivery projections are subject to changes based on fluctuations in supply of component parts.

BACK ORDERS:

All systems will be shipped complete. VIC will not back order any components unless the purchaser agrees to a back order to expedite shipping. In this event, purchaser agrees to install back ordered parts at no cost to VIC Manufacturing Company.

REQUEST FOR FURTHER INFORMATION:

If your company decides to favor VIC Manufacturing Company as it's vendor, please furnish us with a purchase order or letter of intent. VIC will then, if requested, prepare more detailed specifications, including a supplier list which can be reviewed by your engineers. We will be happy to quote on alternate component suppliers, as may be requested, to arrive at the final system price and specifications.

In the event the purchaser specifies a particular brand name recorder, valve, blower, etc. that does not appear on VIC's approved supplier list, VIC Manufacturing Company will extend this supplier's actual warranty to the purchaser in lieu of the standard VIC warranty.

INTERNATIONAL
SENSOR TECHNOLOGY

IST INFORMATION

International Sensor Technology has been in the Gas Monitoring business for over ten years. We manufacture the most complete line of combustible and toxic gas monitoring instruments in the world. Our patented revolutionary Solid State Sensor is the heart of our system. It is the only such sensor on the market and offers a 3 year warranty with life expectancy of 10 years, minimum.

IST products in the field exceed 30,000 and are distributed worldwide. We have not experienced a burned out sensor in all this time - our sensor replacement business averages less than five units per month.

The IST Solid State Sensor is NOT a catalytic type. It is not, therefore, subject to the zero drift/span stability problems which are matters of record with catalytic sensors. It does not operate on the combustible principle, therefore, does not get hotter in presence of gas. As a result it does NOT burn out, and does not lose sensitivity with the passage of time as do all other sensors. Please refer to our IST Solid State Sensor article for further information.

IST sensors have been approved for use at launch site locations at Cape Canaveral and on the Space Shuttle, by NASA, after heavy investigation, testing and evaluation. (The applications are for Hydrogen in the atmosphere at the Cape, and Hydrogen in Helium on the Shuttle.) A Russian pipeline project is using over 150 systems, at temperatures down to -40°F for Ammonia detection at low parts per million in Nitrogen. Our growing list of customers include:

NASA, Kennedy Space Center; Florida (Hydrogen)

Kirtland Air Force Base: New Mexico (Carbon Monoxide, diesel fuel, Ammonia, Hydrogen.)

NASA Space Shuttle; Main Propulsion Test Article (Hydrogen)

ARCO Polymer: Pt. Arthur, Texas (Hexane and Butane)

Columbia LNG: Lusby, Maryland (Natural Gas)

Mobil Oil Co.; Torrance, California (H_2S)

Texas Instruments; Houston & Dallas, Texas (Hydrogen)

Santa Fe Pipeline: Oklahoma (Ammonia)

Johnson Wax Co.; Racine, Wisconsion (IsoButane)

Union Oil Co.; Kenai, Alaska (Natural Gas)

Exxon: Baton Rouge, Louisiana (Hexane & Chlorine)

Caterpillar Tractor; Peoria, Illinois (Natural Gas)

Champlin Oil Refinery; Wilmington, California (H_2S)

We have a large amount of equipment installed on many offshore platforms and drilling ships, all over the world including:

ZAPATA, ODECO, SHELL, UNION SEDCO, STANDARD OIL (of California)

SEDCO has at least one platform in the North Sea. It has had IST equipment operating without sensor replacement problems for at least 3 years.

TOXIC OR COMBUSTIBLE GAS MONITORING INSTRUMENTS

AG2000 SERIES

(WALL MOUNT)

TECHNICAL DATA SHEET

DESCRIPTION — AG2000/2002/2003/2004 WEATHERPROOF

Series AG2000 consists of FOUR distinct models shown opposite. EACH model is contained in a weatherproof, fiberglass NEMA 12 enclosure. Each has a plexiglas, gasketed, viewing window, and a gasketed, lockable door. The enclosures are standard machine tool gray, all external metal parts are stainless steel. External flanges are included to facilitate WALL MOUNTING.

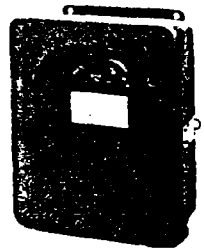
Electronic circuitry is contained in a blue anodized aluminum chassis mounted inside the enclosure. An illuminated meter provides easy viewing in dark areas, thru the window.

Completely separate electronics are provided for EACH channel. Each channel has individual controls for zero, span, warn, alarm and preset. Each channel has 3 relays for warn, alarm and malfunction plus its own meter, and individual sensor.

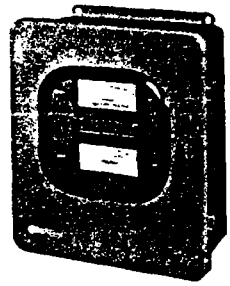
A preset switch permits adjustment of warn/alarm setpoints in conjunction with a preset potentiometer. Calibration gas is not needed for set point adjustment and zero/span controls need not be disturbed.

Combustible or toxic gases can oe handled by all models. In the multichannel versions, different gases and/or ranges can be accommodated in different channels on the same instrument.

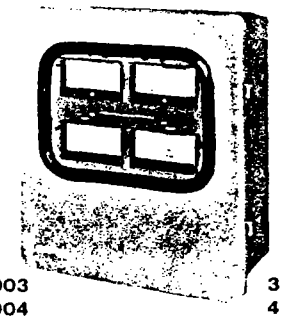
LED's are provided for ACTIVE (power on), WARN, ALARM and MALFUNCTION indication, for EACH channel. All controls are accessible with the door open (AG2000, 2002, 2003, 2004) or with explosion proof cover removed (AG2200).



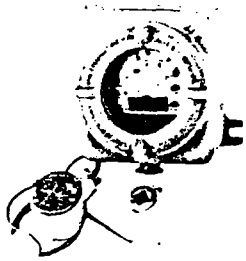
AG2000 — 1 Channel



AG2002 — 2 Channel



AG2003 — 3 Channel
AG2004 — 4 Channel



AG2200 — 1 Channel

DESCRIPTION — AG2200 EXPLOSION PROOF

The AG2200 is a single channel instrument contained in an explosion proof (Class I, Div. I) Group D housing. It has a removeable cover, allowing access to circuitry and controls. Flanges provide an easy method for WALL MOUNTING.

Electrical circuitry is the same as the Series AG2000 described above, and under specifications (next page).

FOR AREA AIR QUALITY AND SAFETY APPLICATIONS

INTERNATIONAL SENSOR TECHNOLOGY

17771 FITCH STREET • IRVINE, CALIFORNIA 92714 • TELEPHONE 714/546-0672 • TELEX 68-2402

ELECTRICAL SPECIFICATIONS

Series AG2000

AC Power ..... 115 VAC 50/60 HZ or 220 VAC 50/60 HZ 15 watts per channel.

Auxiliary DC input ..... 12 to 15V (24 VDC optional).

Operating temperature on electronic module ..... −10°C to +50°C*

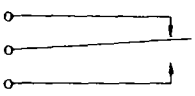
Extended operating temperature on electronic module (optional) ..... −45° to +50°C

Operation temperature on sensor module ..... −40°C to +90°C*

*The actual gas involved and span (range) of sensor, determines temperature range. Contact IST for more information.

Warn/Alarm Functions ..... Warn and Alarm relays are provided for each channel, on each model. Each relay has two sets of contacts, Norm open and Norm closed (SPDT-Form C) as shown (except AG2200*):

*NOTE: AG2200 has one set contacts (Form C) for Warn and Alarm; and one set Norm Open (Form A) for malfunction.



Malfunction ..... A malfunction relay is included for each channel on each model.

Relay contact ratings ..... 1/10 HP @ 120 VAC, 3 AMP @ 32 VDC resistive or 3 AMP @ 240 VAC (80% PF).

Recorder output ..... 100 millivolt DC (4-20 milliamp optional).

Warn/Alarm Set Points ..... Warn or Alarm set points are fully adjustable over 0-100% full scale.

Sensor Wire Length ..... A standard unshielded three conductor cable is used to connect sensor and controller. Unless otherwise specified at time of purchase, IST supplies four feet of cable for the convenience of calibration. During installation new cable is installed as per following table:

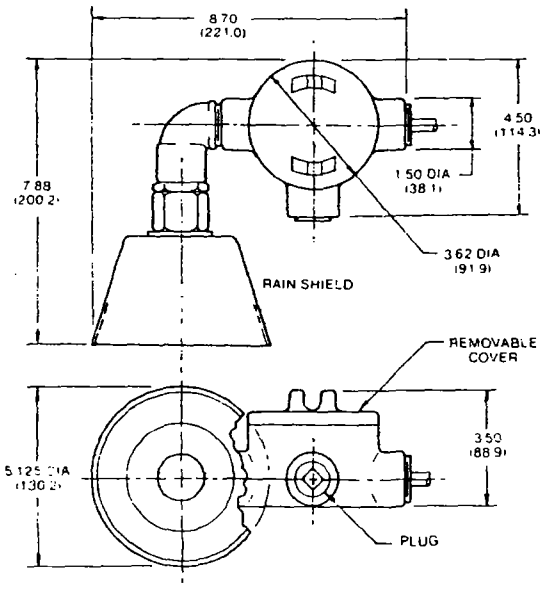
Wire Gage (AWG)	Maximum Length. Ft. Combustible (%LEL)	Toxic (ppm)
22	275	400
18	700	1030
16	1150	1690
12	2900	4270

The length of the cable is controlled by the heater wire on the sensor, the maximum loop resistance is 10 ohms for combustible sensors and 15 ohms for toxic sensors.

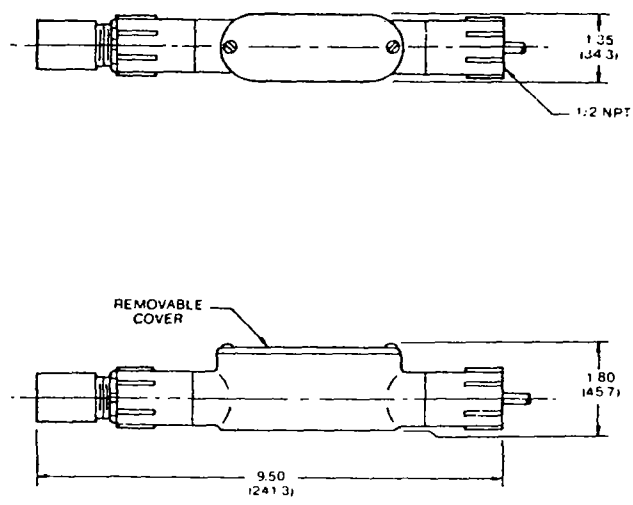
Sensor housing ..... Standard sensor housings are explosion proof, Class 1, Division 1 Group A, B, C, and D (¾" conduit). Sensor housing for Chlorine monitoring is plastic with ½" conduit as indicated below:

SENSOR HOUSING

(Shown in inches and millimeters.)



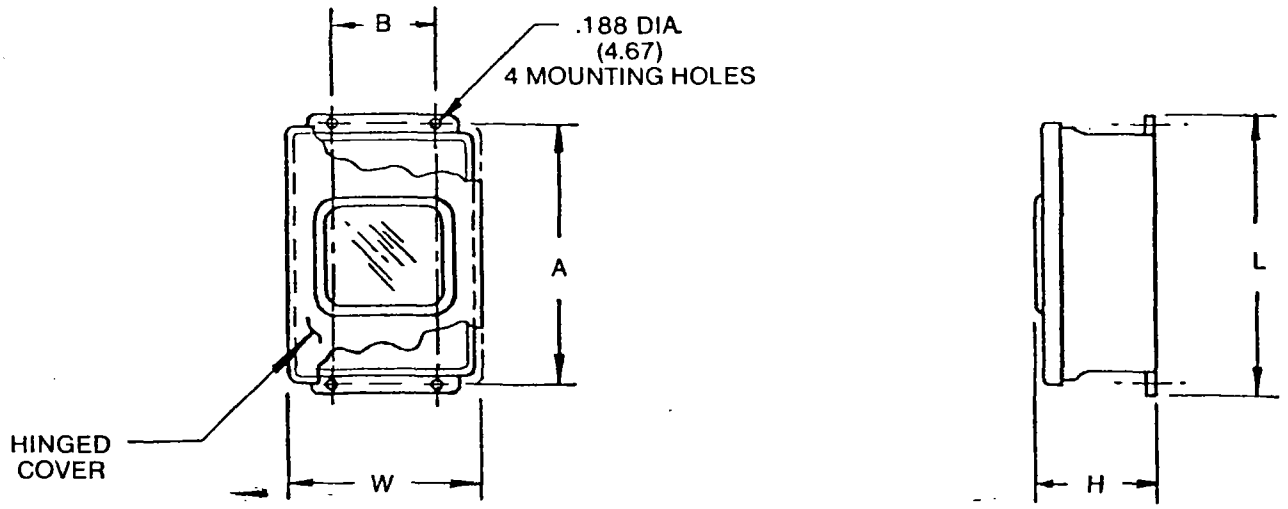
EXPLOSION PROOF TYPE
(with rainshield)



PLASTIC TYPE

DIMENSIONS

(Shown in inches and millimeters.)

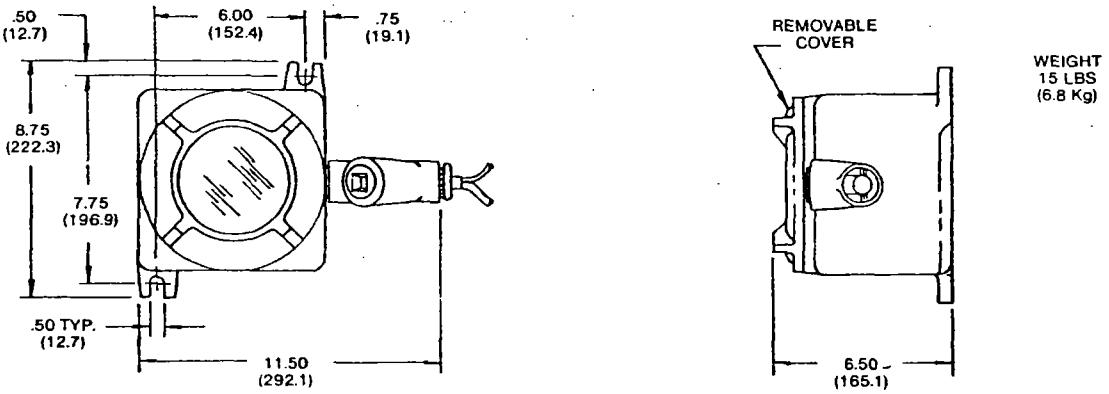


MODEL	MOUNTING HOLES A x B	OVERALL DIMS. L x W x H	WEIGHT
AG 2000	10.75 x 6.00 (273.1 x 152.4)	11.50 x 9.25 x 4.00 (292.1 x 234.5 x 101.6)	10.0 lbs (4.54 kg)
AG 2002	12.62 x 8.00 (320.6 x 203.2)	13.50 x 11.25 x 5.28 (342.9 x 285.8 x 134.1)	15.0 lbs (6.80 kg)
AG 2003	14.62 x 10.00 (371.4 x 254.0)	15.50 x 13.25 x 6.28 (393.7 x 336.6 x 159.5)	20.25 lbs (9.20 kg)
AG 2004			

DIMENSIONS

(Shown in inches and millimeters.)

AG 2200



About IST

International Sensor Technology has successfully pioneered a new Solid State gas sensor for the detection and monitoring of toxic and explosive gases since 1972. IST has rapidly gained world wide recognition as a leader in the field of Solid State Gas Sensor monitoring instrumentation.

Technical accomplishment has been impressive. IST has often helped solve the most difficult gas monitoring problems.

These include:

- Monitoring systems for testing the main propulsion engine for NASA's Space Shuttle program.
- U.S. Air Force research program.
- LNG and ammonia pipe lines requiring monitoring gases in a nitrogen background.
- Ammonia pipe line from Louisiana to Illinois.
- Special toxic or explosive gases in the petrochemical, electronic, and chemical industries for which no conventional gas instrumentation is suitable.

IST technical personnel have gained valuable new experience daily through furnishing technical information and consultation to various industries. The accumulated technical knowledge is one of IST's greatest assets. The company is dedicated to continuing to serve industry with this expertise.

About the Sensor – IST Patented Soli[illegible]ate Electrolytic Cell Gas Sensor

Detection of toxic or explosive gases is accomplished by embedding two electrodes in the solid-state sensor cell [illegible]pplying voltage between the electrodes. In the pre[illegible]e of explosive or toxic gases, the gas molecules are transformed within the sensor cell and the electrical current flows between the electrodes. The concentration of gas is accurately reflected by measuring the change in strength of the electrical current.

More specifically, the solid-state cell is composed of several metal and non-metal oxides from the transition elements, Group III and Group IV of the Periodic Table. The gas molecules are dissociated into charged ions or complexes of ions. These are then collected as an electrical signal which is used by the instrumentation electronics.

The IST instrument is selective in that it can be made more sensitive to one gas or group of gases and insensitive to others. The use of the solid-state electrolytic cell principle results in an instrument that is stable within a wide range of temperature and humidity.

The simplicity of the electronic circuit required, and the low power consumption needed to operate the sensor results in a family of reliable instruments for many applications.

There are two configurations on the sensor as shown below:

IST Solid State Sensors will monitor most gases, except for inert gases (N_2, CO_2, etc.). Gases and concentration ranges which are most frequently used are listed in the chart. It is impossible to provide a complete list. Please contact IST or our representatives regarding gases not listed.

GASES	[illegible]ANGE
Acetone	0-200, 500, 1000 ppm and %LEL
Acetylene	ppm and %LEL
Allyl Alcohol	0-50, 200 ppm and %LEL
Allyl Chloride	0-100 ppm and %LEL
Ammonia	0-75, 100, 150, 200, 400, 1000 ppm and %LEL
Vinyl Cyanide or Acrylonitrile	0-60, 200 ppm and %LEL
Benzene	0-75 ppm and %LEL
Butadiene	ppm and %LEL
Butane	0-1000 ppm and %LEL
Butanol	0-100 ppm and %LEL
Carbon Disulfide	0-60 ppm
Carbon Monoxide	0-100, 150, 500, 1000, 3000 ppm and %LEL
Chlorine	0-10, 20, 50 ppm
Dichloroethane	ppm and %LEL
Epichlorohydrin	50, 100, 200, 1000 ppm and %LEL
Ethyl Acetate	ppm and %LEL
Ethyl Benzene	200 ppm and %LEL
Ethylene	ppm and %LEL
Ethylene Oxide	0-50, 150, 200, 300, 1500 ppm and %LEL
Freon - 22	100, 1000 ppm
Hexane	200 ppm and %LEL
Hydrazine	1.5 ppm
Hydrogen	100, 1000 ppm and %LEL
Hydrogen Sulfide	10, 20, 30, 50, 100 ppm and %LEL
Hydrogen Cyanide	50, 100, 200 ppm and %LEL
JP-4	ppm and %LEL
Methane	100 ppm and %LEL
Methanol	200 ppm and %LEL
Methyl Bromide	20, 100 ppm and %LEL
Methyl Chloride	200, 300 ppm and %LEL
Naphtha	ppm and %LEL
Nitrogen Oxides	10, 20 ppm
Propane	1000 ppm and %LEL
Propylene	100 ppm and %LEL
Tetrachloroethylene	200 ppm and %LEL
Styrene	200 ppm and %LEL
Tetrahydrofuran	ppm and %LEL
Toluene	200, 500 ppm and %LEL
Vinyl Chloride	20, 100, 400 ppm and %LEL
Xylene	ppm range to %LEL

IMPORTANT – Gases listed above are subject to interference by other gases. IST Sensors are designed for area air quality and safety applications. Please consult IST for specific data.

OTHER TECHNICAL DATA SHEETS

Catalog No.	
3100:1082	1 & 2 channel rack/panel mounted models.
512:1081	Microprocessor based AG512 system. Modulized and computerized system suitable from 1 to 511 channel monitoring.
80/80R:981	8 channel modulized unit, suitable from 1 to 8 channel.
5000	All IST portable instruments.

REPRESENTED BY:

NOTE:
This catalog describes general features and performance of IST gas monitoring instruments. The operating and instruction manuals and other literature supplied with these instruments are the only source of specific details regarding proper operation and maintenance of the equipment. These instructions must be carefully read. The precautions must be followed in detail. Under no circumstances should any of these products be used — EXCEPT by trained, qualified personnel.

Bat I 232

James F. Murphy, Jr. Adams MA
Assistant Vice President
Polyfibron Division

W. R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

GRACE

July 25, 1985

B-85-IF007

Mr. David Howland
Department of Environmental Quality Engineering
Western Region
436 Dwight Street, Fourth Floor
Springfield, MA 01103

Dear Mr. Howland:

Confirming what I told you on the phone, attached are two sets of plans and specs for the carbon bed adsorber control equipment which will bring the Adams plant into compliance with regulation CMR 7.18. This compliance with the Appendix B State Bubble plan was demonstrated in my letters to you dated July 26, 1984 and December 21, 1984 and letter to John Kirzec dated June 21, 1985.

We will monitor the control system and compliance with CMR 7.18, on a monthly average and will record the actual daily emissions as compared to the allowable daily cap.

Very truly yours,

James F. Murphy, Jr.

James F. Murphy, Jr

JFM/sbw
Enclosures

APPROVED
Department Of Environmental Quality Engineering
PBK for SFT Date 12-31-85

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING
DIVISION OF AIR QUALITY CONTROL
WESTERN REGION
STATE HOUSE - WEST, 436 DWIGHT STREET - 4th FLOOR
P.O. BOX 2410, SPRINGFIELD, MA 01103
TELEPHONE NUMBER 413-785-5327

FORM DDS-3	DESIGN DATA SHEET FOR INDUSTRIAL AND COMMERCIAL FACILITIES

A APPLICABILITY

As provided in 310 CMR Section 7.02, no person shall construct, substantially reconstruct, or alter any facility regulated therein that may cause or contribute to a condition of air pollution unless the plans, specifications, proposed Standard Operating Procedure, and proposed Maintenance Procedure for such facility have been submitted to the Department of Environmental Quality Engineering, Division of Air Quality Control, for approval and approval has been granted in writing. Written Department approval is required prior to the construction, installation, modification, or operation of the proposed project. An incomplete or inaccurate PLANS APPLICATION may extend the review period beyond the normal sixty days.

B PROJECT DESCRIPTION

1. Name of Facility: W. R. Grace & Co., Polyfibron Division

2. Location of Facility: Harmony Street, Adams, Massachusetts 01220

3. Is this Application for New Facility to be Constructed? _____; or for Existing Facility to be Modified? X; 4. Describe: The facility includes a carbon bed adsorber which will collect the VOC emissions from three solvent based compound coaters.

5. Owner or Responsible Corporate Officer (to whom Approval will be sent): James F. Murphy, Jr.; 6. Phone: (617) 861-6600

7. Address: W. R. Grace & Co., 55 Hayden Ave., Lexington, Massachusetts 02173

8. Technical Questions to? William J. Jolivet; 9. Phone: (413) 743-0546

10. Address: W. R. Grace & Co., Harmony Street, Adams, Massachusetts 01220

11. Contact Person at Site: Alan T. Michaud; 12. Phone: (413) 743-0546

13. Projected Start-up Date: Completed 12/31/85

C | MATERIALS THAT CONSTITUTE A PLANS APPLICATION

Proposed projects, which are subject to Plans Application requirements for industrial and commercial facilities, must submit the following items to the appropriate Regional Office (see list on Page 11) for technical review.

The Regional Office will be glad to answer any questions concerning this submittal, such as the applicability of Regulation 310 CMR 7.02 to the proposed project, or the acceptable formats for the items requested below.

Copies of the "Regulations for the Control of Air Pollution" may be obtained from the State Bookstore, Room 116, State House, Boston, MA 02133. Telephone Nunmber 617-727-2834.

* Manufacturer's Specifications and Brochures for Process Equipment, Add-on Air Air Pollution Control Equipment, Fans/Blowers, etc.

THE FOLLOWING ITEMS SHOULD BE SUBMITTED IN DUPLICATE AND MUST BEAR THE SEAL AND SIGNATURE OF A MASSACHUSETTS REGISTERED PROFESSIONAL ENGINEER

* DESIGN DATA SHEET FOR INDUSTRIAL AND COMMERCIAL FACILITY - Data should reflect the new or modified process equipment at the facility.

* DESIGN DATA SHEET(S) for Add-on Air Pollution Control Equipment, Fossil Fuel Equipment, or for Volatile Organic Compounds (VOC's), if applicable. See listing on Page 11 of this form.

* STANDARD OPERATING PROCEDURE and STANDARD MAINTENANCE PROCEDURE - See Section J and Section K of this form.

* PLOT PLAN - Scaled drawing indicating the outlines of the significant structures within 1500 feet of the building containing this project. Topographic contours may be shown on this plan or on separate plan.

* TOPOGRAPHIC MAP - United States Geodetic Survey (USGS) map, or equivalent, showing the topographic contours for a distance of 1500 feet beyond the boundary lines in every direction. (This may be part of PLOT PLAN.)

* ROOF PLAN; BUILDING ELEVATION PLAN - Scaled drawings indicating the locations of all fresh air intakes, windows, and doors.

* SCHEMATIC PROCESS DIAGRAM - Dimensioned plan showing process equipment, hoods, ductwork, dampers, fans, temperature/pressure sensing devices, other monitors, air pollution control equipment, and all vents, by-passes, or discharges to atmosphere.

* CALCULATIONS - Detailed calculation sheets showing the manner in which the pertinent quantitative data was determined. This is especially important for calculated emission rates, sizing of air pollution control equipment, and sizing of air moving equipment.

* MISCELLANEOUS - The Department may require other materials if it considers them necessary to the plans review. For example, modeling studies may be required, or monitoring data, or a noise survey. These special items are not usually requested except on the more complex or larger projects.

DETAILED PROJECT DESCRIPTION

1. Does this application include all items requested in Section C, "Materials That Constitute a Plans Application"? (yes or no): Yes

2. If No, Explain: N/A

3. For the purpose of determining a "potential" emission rate (or rates), give the maximum operating times for this project:

   a. hours/day 24; b. days/week 5; c. weeks/year 48.

4. Fully describe the process equipment that will be installed, modified, or controlled, identifying;

   a. maximum capacity of process equipment
   b. chemical identity of all raw materials
   c. chemical identity of all finished products
   d. sequence of process events keyed to the "Process Diagram" required in Section C
   e. process temperatures
   f. process pressures

   Use additional sheets of paper if necessary. If volatile organic compounds (VOC) are used, attach separate formulation sheet(s), Forms DDS-6 or 7.

   See attached note part D4

(Section D is continued on the next page)

Part D4

Three existing solvent based rubber compound coaters will have their VOC emissions controlled by this installation. The attached process flow sheet shows this equipment and how it will be tied into a new four (4) bed activated charcoal adsorber. An existing underground storage tank will be used to collect the recovered solvent.

The #1 and #2 Spreaders have the substrate attached as an endless belt and the coating is applied in very thin multiple layers. The Carcass Coater has an unwind and wind up and is a single pass coater. For any coating cycle more or less time is spent actually coating the substrate depending on whether the product is coated on the Spreaders or on the Carcass Coater. The reason for this is the difference in down time required to get the substrate on, and the finished product off, the machine. To further complicate the scheduling, some products must be run consecutively on both the Spreaders and the Carcass Coater.

As mentioned in Part E, the complexities of our process and our scheduling led us to design and run a computer model of a typical four weeks of production just to be sure that the design criteria for the control equipment was correct.

The product, in all cases, is a fabric coated with rubber, As mentioned in Part G, the air handling system is not yet totally designed to the point of being able to list name and model number of fans. The design criteria is such that the system will be able to operate effectively to carry the ventillation air (and VOC) from any one or all of the units to and through the control equipment. This is explained more fully in Part G.

APPROVED

Department Of Environmental Quality Engineering

JBL for SET Date 12-31-85

COMMONWEALTH OF MASSACHUSETTS
JAMES F. MURPHY
No. 7289
REGISTERED PROFESSIONAL ENGINEER

James F. Murphy Jr.
1/22/1986

(Section D continued)

5. Specify maximum consumption/usage rates of each raw material:

#1 Spreader -- 70#/hr of Rubber Solution

#2 Spreader -- 70#/hr of Rubber Solution

Carcass Coater -- 165#/hr of Rubber Solution

6. Describe storage/handling procedures for raw materials:

Web stored/handled in rolls. Coating handled/stored as viscious liquid in portable tanks.

7. Specify maximum production rate(s) of finished products:

#1 Spreader -- 28 YD^2/hr.

#2 Spreader -- 28 YD^2/hr.

Carcass Coater -- 76 YD^2/hr.

8. Describe storage/handling procedures for finished products:

Product stored/handled as rolls

9. Describe features of equipment layout designed to allow for future growth, emission control device add-on, or stack testing ports?

Explain: Plant would not be expanded in this location

10. Describe how fugitive emissions will be minimized, especially during process upsets, or disruptions: Entrances and exits of coaters shrouded to improve capture of slovent vapors

11. Explain those aspects of the design that have been required because of other environmental concerns, or safety concerns, or other regulations, such as; construction materials, handling practices, system interlocks, waste disposal procedures, etc.:

Maintain ventilation so as to keep solvent/air mixture at or below 25% of LEL. This prevents risk of ever operating dryer in the explosive range.

E | EMISSIONS DATA

1. Maximum Gaseous Emission Rates

	Chemical Name	BEFORE CONTROL (pounds/hour)	AFTER CONTROL (pounds/hour)	AFTER CONTROL (ppm by volume)
a.	Toluene	182	18.2	
b.	1-Nitropropane	20	2.0	
c.				

2. Maximum Particulate Emission Rates

	Chemical Name	BEFORE CONTROL (pounds/hour)	AFTER CONTROL (pounds/hour)	AFTER CONTROL (ugm/cubic meter)
a.	N/A			
b.	N/A			
c.				

3. Indicate how the above emission rates were obtained, and attach appropriate calculations and documentation: See attached note part E3

F | AIR POLLUTION CONTROL EQUIPMENT

If new air pollution control equipment is proposed or if existing control equipment will be modified or affected by this project, then an equipment specific Design Data Sheet must be submitted. (See last page for listing.)

1. Is Emission Control System: Proposed? X ; Existing? ____; None? ____.

2. If Proposed or Existing, Describe: Carbon bed adsorber for VOC collected from three solvent based compound coaters.

3. Best Available Control Technology (BACT) may be required for this project, as stated in Regulation 310 CMR 7.02(2)(a)6.

   a. Does this application represent BACT? Yes

   b. If Yes, is required supplementary documentation attached? Yes

   c. If No, explain why this project is exempt: ____

Part E3

Daravation of maximum gaseous emission rates in 1a and 1b

On the AP2 and AP5 forms dated December 20, 1984 and attached to my letter to David Howland (dated December 21, 1984) we indicate the following:

Maximum rate per hour for rubber solution

#1 Spreader -- 70 pounds
#2 Spreader -- 70 pounds
Carcass Coater -- 165 pounds

On the same inventory sheets we indicate the VOC in the rubber solution used on the spreaders is 63% and the VOC in the rubber solution used on the Carcass Coater is 69%

The VOC in these rubber solutions is 90% Toluene and 10% 1-Nitropropane.

NUMBERS IN POUNDS/HOUR

	Total Pounds Rubber Solut.	Pounds Toluene	Pounds 1-Nitropopane
#1 Spreader	70	39.7	4.4
#2 Spreader	70	39.7	4.4
Carcass Coater	165	102.5	11.4
		181.9	20.2

Because of the complexity of our products and hence the complexity of our operations we decided to design a computer model which would simulate four weeks of operation. During these four weeks we would produce all of the products we make and would simulate about 1/12 of our annual production of each product. Most of our products require multiple coating runs and many require sequential runs on several pieces of coating equipment.

After running this computer model we feel confident that the design capacity of the control is not only adequate, but perhaps somewhat overdesigned. It turned out to be virtually impossible to run the worst case conditions on all three coaters at the same time because of product restrictions.

APPROVED

Department Of Environmental Quality Engineering

JBK for SFT Date 12-31-85

COMMONWEALTH OF MASSACHUSETTS
JAMES F. MURPHY
No. 7289
REGISTERED PROFESSIONAL ENGINEER

James F. Murphy Jr. 12/27/1985

G | AIR HANDLING SYSTEM

This section is for the description of those fans and those flow parameters associated with the processes and/or the air pollution control equipment.

	FAN A	FAN B	FAN C
1. Fan Manufacturer.....	See Attached Note Part G 1 thru 5		
2. Fan Model Number.....			
3. Fan Type (axial, centrifugal, etc.).....			
4. Capacity (in scfm).....			

MANUFACTURER'S FAN PERFORMANCE CURVE MUST BE SUBMITTED WITH THIS APPLICATION IF THE FANS ARE AN INTEGRAL PART OF THE INSTALLED OR MODIFIED EQUIPMENT. IF THIS IS NOT ATTACHED AN EXPLANATION IS REQUIRED BELOW:

5. Fan Operating Point in this System

	FAN A	FAN B	FAN C
a. Actual RPM.....	See Attached Note Part G 1 thru 5		
b. Temperature at the fan (°F).....			
c. Fan Pressure (static pressure, in. H_2O)			
d. Actual flow rate at fan (acfm).....			
e. Actual Horsepower requirements.....			

H | MISCELLANEOUS DATA

1. Number of Employees at this Facility: 150

2. Standard Industrial Classification (SIC) Code(s) for this Facility: 2641

3. Does municipal water supply to your process operations have the required "back-flow" preventer? N/A. If Yes, is it registered with the DEQE Division of Water Supply? _____.

Part G 1 thru 5

Although the engineering of the air handling system has not been completed to the point of being able to specify fans by name and model number, the design concept has been set.

Since the VOC emissions from the three coaters will be sent to a single activated charcoal adsorber, and since each of the coaters will only be operating part of the time, the air handling system must be flexible.

The system will have a main fan which will have high volume (20,000 cfm) and low static (enough to overcome system pressure drop). This main fan will have a variable speed motor and will draw the exhaust from all three of the coaters. The fan speed will change depending upon how many of the coaters are operating. The actual speed change is made by a pressure control in the air system.

The emission from the main fan will feed low volume (6,000 cfm) high static (18" wc) fans, one of which will be on each carbon bed. Each of the carbon beds is designed to take 6000 cfm but because of the high static (18" wc) required to push 6000 cfm through the carbon bed, we felt it was best not to have a high pressure blower operate over a large range of cfm. We therefore designed this system with the smaller (6000 cfm) high pressure, single speed, fans on each of the carbon beds, being fed by the larger, variable speed, low pressure fan.

As soon as we have the fan makes and model numbers we will forward them to you.

APPROVED

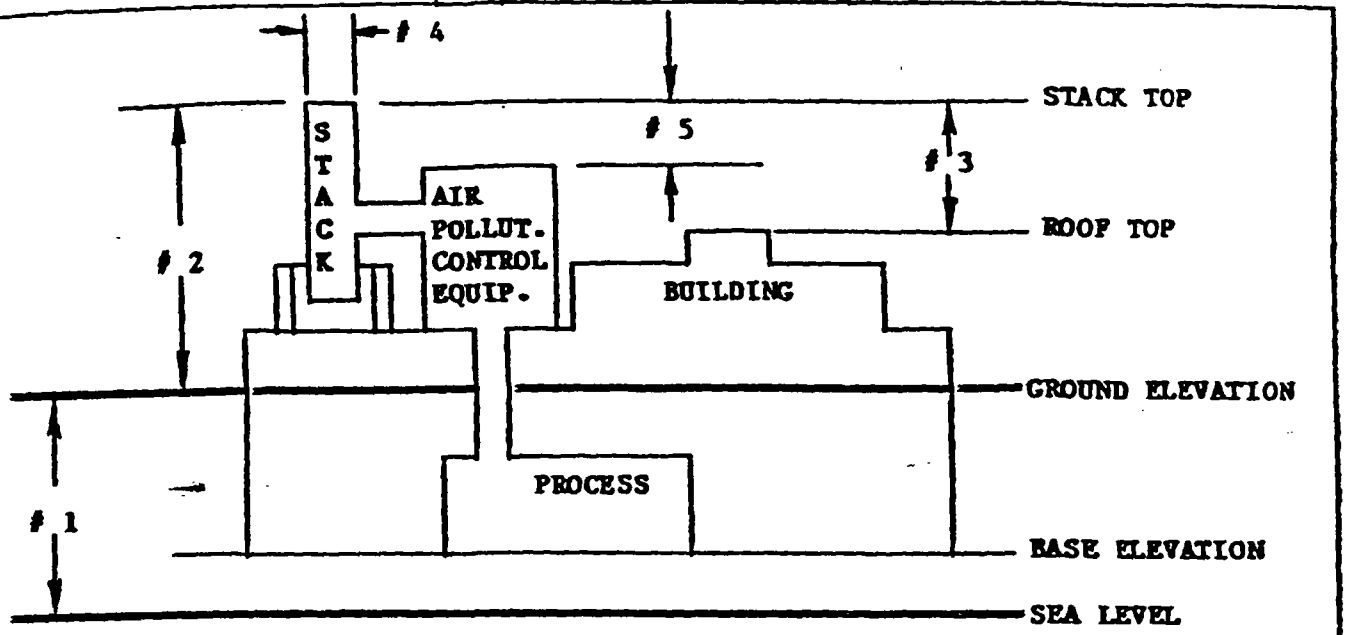
Environmental Quality Engineering

JEK for SFT Date 12-31-85

COMMONWEALTH OF MASSACHUSETTS
JAMES F. MURPHY
No. 7280
REGISTERED PROFESSIONAL ENGINEER

James F. Murphy Jr 7/22/1985

I STACK OR VENT DATA



QUESTIONS FOR THE ABOVE DIAGRAM	STACK 1	STACK 2	STACK 3
1. Height of Ground Above Sea Level..... (arrow # 1)	830 ft	ft	ft
2. Height of Stack Top above Ground..... (arrow # 2)	30 ft	ft	ft
3. Height of Stack Top above Roof..... (arrow # 3)	12 ft	ft	ft
4. Stack Exit Size (inside)..... (arrow # 4)	48 in	in	in
5. Height of Stack Top above Control Equip.. (arrow # 5)	20 ft	ft	ft
6. Discharge direction (horiz. or vertical).	Vertical		
7. Identify Stack Nos. as they appear on Process Diagram.....	N/A		
8. Inside Shell Material.....	Steel		
9. Outside Shell Material.....	Steel		
10. Range of Gas Exit Velocity (ft/sec).....	8 to 26.7	to	to
11. Range of Stack Gas Exit Temp. (°F).....	105 to 105	to	to
12. Range of Stack Gas Volume (acfm).....	6400 to 21,400	to	to
13. Type of Rain Protection.....	None		

NOTE: The rain protection device should be of such a design as to allow the unimpeded escape of the stack gases. "Rain Hats" are prohibited.

The stack parameters will be evaluated to assure they provide sufficient protection from building, terrain, and stack tip downwash effects.

J | STANDARD OPERATING PROCEDURE

Describe the start-up, operational, shut-down, and emergency procedures for the equipment that is integral to this project. The description must present, in sequence, the major steps that must be taken by the operator(s) to correctly and safely run the system. For each step, specify the duration and purpose, especially as it relates to maintaining safe operation and minimizing the emission of air contaminants. This description must detail the inter-relationship of the timing devices, the temperature indicators, the pressure indicators, the flow rate indicators, etc. The differences between the manual control procedures and automatic control procedures must be indicated. Types, amounts, and duration of the release(s) of air contaminants during system transients will be considered in evaluating the Standard Operating Procedure. Use additional paper if necessary.

See Attached VIC Manufacturing Company Instruction Manual -- Section B

K STANDARD MAINTENANCE PROCEDURE

Describe preventive maintenance procedures for this entire system. Include such items as cleaning, part replacement, scrubbing solution renewal/replacement schedules, method of leak testing, frequency of leak testing and/or effluent sampling to establish adequacy of control systems. Include Manufacturer's maintenance requirements. Each air pollution control device requires a separate and detailed maintenance procedure. Use additional paper if necessary.

See Attached Vic Manufacturing Company Instruction Manual -- Section C

L | PLANS APPLICATION PREPARER

1. Person Who Compiled the Plans Application Materials: Donald Johnstone
2. Representing: W. R. Grace & Company
3. Address: 55 Hayden Avenue

   Lexington, Massachusetts 02173
4. Telephone Number: (617) 861-6600 ; 5. Date Completed: 7/22/85

M | CLOSING INSTRUCTIONS

PLEASE ATTACH THE NECESSARY ADDITIONAL ITEMS (SEE PAGE 1). HAVE THE APPROPRIATE ITEMS CERTIFIED BY A MASSACHUSETTS REGISTERED PROFESSIONAL ENGINEER. SUBMIT THE ORIGINAL AND ONE COPY TO THE APPROPRIATE REGIONAL OFFICE (SEE PAGE 10). PLEASE ALLOW SIXTY DAYS FOR REGIONAL REVIEW AND APPROVAL OF A COMPLETE SUBMITTAL.

N | CERTIFICATION

THE SEAL AND SIGNATURE OF A MASSACHUSETTS REGISTERED PROFESSIONAL ENGINEER MUST BE ENTERED BELOW. THIS CERTIFIES THAT THE INFORMATION CONTAINED IN THIS FORM HAS BEEN CHECKED FOR ACCURACY, AND THAT THE DESIGN REPRESENTS GOOD AIR POLLUTION CONTROL ENGINEERING PRACTICE. (THESE MUST BE ORIGINALS. NO PHOTO-COPIES, ETC., OF THE SEAL AND SIGNATURE WILL BE ACCEPTED.)

COMMONWEALTH OF MASSACHUSETTS
JAMES F. MURPHY
No. 7289
REGISTERED PROFESSIONAL ENGINEER

James F. Murphy, Jr. ; 7289 ; July 22, 1985 .

(signature) P.E. # (date)

O | REGIONAL OFFICE LOCATIONS

AIR QUALITY SECTION CHIEF DIVISION OF AIR QUALITY CONTROL **METROPOLITAN BOSTON/NORTHEAST REGION** 323 NEW BOSTON STREET WOBURN, MA 01801 TELEPHONE: 617-935-2160 or 727-5194	AIR QUALITY SECTION CHIEF DIVISION OF AIR QUALITY CONTROL **SOUTHEAST REGION** LAKEVILLE HOSPITAL MAIN STREET LAKEVILLE, MA 02346 TELEPHONE: 617-947-1231 or 727-1440 x680
AIR QUALITY SECTION CHIEF DIVISION OF AIR QUALITY CONTROL **WESTERN REGION** STATE HOUSE - WEST 436 DWIGHT STREET - 4th FLOOR SPRINGFIELD, MASSACHUSETTS MAIL TO: P.O. BOX 2410 SPRINGFIELD, MA 01103 TELEPHONE: 413-785-5327	AIR QUALITY SECTION CHIEF DIVISION OF AIR QUALITY CONTROL **CENTRAL REGION** 75 GROVE STREET WORCESTER, MA 01605 TELEPHONE: 617-792-7653

P | LIST OF DESIGN DATA SHEETS AVAILABLE FROM THE DEPARTMENT

* DDS-1 - FOR FOSSIL FUEL UTILIZATION FACILITY

* DDS-2 - FOR BURNER REPLACEMENT

* DDS-3 - FOR INDUSTRIAL AND COMMERCIAL FACILITIES - To be submitted with PLANS APPLICATION whenever a modification of existing process equipment, or the installation of new process equipment is desired. This form should also be completed when air pollution control devices are to be modified or installed. In such cases, one or more of the following six forms must also be completed.

    * DDS-3a - FOR FABRIC FILTERS (BAGHOUSES)

    * DDS-3b - FOR CYCLONIC OR INERTIAL SEPARATORS

    * DDS-3c - FOR WET COLLECTION DEVICES (SCRUBBERS)

    * DDS-3d - FOR ADSORPTION EQUIPMENT

    * DDS-3e - FOR AFTERBURNERS

    * DDS-3f - FOR ELECTROSTATIC PRECIPITATORS

* DDS-4 - FOR RESIDENTIAL, COMMERCIAL, AND INDUSTRIAL INCINERATORS

* DDS-5 - FOR SOLVENT METAL CLEANERS)
* DDS-6 - FOR PAINT SPRAYING) - - VOC SOURCES
* DDS-7 - FOR APPLICATION OF SURFACE COATINGS)

* DDS-8 - FOR SURVEY OF NOISE POTENTIAL

W. R. GRACE & CO., POLYFIBRON DIVISION

62 WHITTEMORE AVENUE, CAMBRIDGE MASSACHUSETTS 02140

ORIGINAL SENT & REVIEW

June 25, 1971

New England Division
Corps of Engineers
~~424~~ Trapelo Road
Waltham, Mass. 02154

Attention: Chief Permits Branch

Gentlemen:

The Refuse Act of 1899

Enclosed is our application for a permit to discharge warm clear water into the Hoosac River from our Adams Plant, Adams, Mass.

Along with the application is our check for $100.00 and a copy of our letter to Mr. John Collins, Mass. Department of Public Health.

Very truly yours,

J.F.M

J. F. Murphy, Jr.
Director Engineering and Purchasing
Applicant's authorized agent

JFM/bjt

cc; Mr. Oscar Ackelsberg/New York Office
Mr. Jack Combes/New York Office
Mr. O.M. Favorito/Cambridge
Mr. John Collins/Div. of Invironmental Health-Boston

GRACE

GDK Copy

ORIGINAL

FORM APPROVED
OMB NO. 49-R 040

DEPARTMENT OF THE ARMY, CORPS OF ENGINEERS

APPLICATION FOR PERMIT TO DISCHARGE OR WORK IN NAVIGABLE WATERS AND THEIR TRIBUTARIES

SECTION I. GENERAL INFORMATION

1. State	Application Number (to be assigned by Corps of Engineers)			
	Div.	Dist.	Type	Sequence No.
— —	01Y	060	3	002251

2. Name of applicant and title of signing official

W. R. Grace & Co.
R.D. GOODALL
CORPORATE VICE PRESIDENT

3. Mailing address of applicant

W.R. GRACE & CO.
3 HANOVER SQ.
NEW YORK, N.Y. 10004

4. Name, address, telephone number and title of applicant's authorized agent for permit application coordination and correspondence.

Mr. J.F. Murphy, Jr.
Director of Engineering & Purchasing
North Ave.
Northwest Industrial Park
Burlington, Mass. 01803 Phone: 617 - 272-4060

NOTE TO APPLICANT: Refer to the pamphlet entitled "Permits for Work and Structures in and for Discharges or Deposits into Navigable Waters" before attempting to complete this form.

Required Information

a. All information contained in this application will, upon request, be made available to the public for inspection and copying. A separate sheet entitled "Confidential Answers" must be used to set out information which is considered by the applicant to constitute trade secrets or commercial or financial information of a confidential nature. The information must clearly indicate the item number to which it applies. Confidential treatment can be considered only for that information for which a specific written request of confidentiality has been made on the attached sheet. However, in no event will identification of the contents and frequency of a discharge be recognized as confidential or privileged information.

b. The applicant shall furnish such supplementary information as is required by the District Engineer in order to evaluate fully an application.

c. If additional space is needed for a complete response to any item on this form, attach a sheet entitled "Additional Information," Indicate on that sheet the item numbers to which answers apply.

d. Drawings required by items 20 and 21 should be attached to this application. Other papers which must be attached to this application include, if applicable, copies of a water quality certification or a written communication which describes water quality impact (see Item 22 and Item 10 of Section II below), the additional information sheet(s) in "c" above, and the confidential information sheet described in "a" above.

Fees

If any discharge or deposit is involved, an application fee of $100 must be submitted with this application. An additional $50 is required for each additional point of discharge or deposit.

Signature

a. If a discharge is involved, an application submitted by a corporation must be signed by the principal executive officer of that corporation or by an official of the rank of corporate vice president or above who reports directly to such principal executive officer and who has been designated by the principal executive officer to make such applications on behalf of the corporation. In the case of a partnership or a sole proprietorship, the application must be signed by a general partner or the proprietor. Other signature requirements are discussed in the pamphlet.

b. If no discharge is involved, an application may be signed by the applicant or his authorized agent.

Application is hereby made for a permit or permits to authorize the activities described herein. I certify that I am familiar with the information contained in this application, and that to the best of my knowledge and belief such information is true, complete and accurate.

Signature of Applicant

18 U.S.C. Section 1001 provides that:

Whoever, in any matter within the jurisdiction of any department or agency of the United States knowingly and wilfully falsifies, conceals or covers up by any trick, scheme, or device a material fact, or makes any false, fictitious or fraudulent statements or representations, or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statement or entry, shall be fined not more than $10,000 or imprisoned not more than five years, or both.

FOR CORPS OF ENGINEERS USE ONLY

Acronym name of applicant _____

Are discharge structures Major? ☐ Minor? ☐ N/A? ☐

Date received, form not complete — — — — — —

Date received, form complete but without certificate — — — — — —

Date received, form complete Date of Cert./Ltr. — — — — — —

Date sent to EPA, form not complete — — — — — —

Date sent to EPA, NOAA, D/I, AEC, FPC in complete form — — — — — —

day mo yr

5. Date: 6 mo 22 day 71 yr

(Office use) 3-000751

6. Check type of application: a. Original [X] b. Revision [ ]

7. Number of original application

8. Name of facility where discharge or construction will occur.

ADAMS PLANT: W.R. Grace & Co., Polyfibron Div.

9. Full mailing address of facility named in item 8 above.

Harmony St.
Adams, Mass. 01220

10. Names and mailing addresses of all adjoining property owners whose property also adjoins the waterway.

L. L. BROWN, HARMONY ST., ADAMS

11. Check to indicate the nature of the proposed activity:
a. Dredging [ ] b. Construction [ ] c. Construction with Discharge [ ] b. Discharge only [X]

12. If activity is temporary in nature, estimate its duration in months.

If application is for a discharge:

13. List intake sources

Source	Estimated Volume in Million Gallons Per day or Fraction Thereof
Municipal or private water supply system	.090
Surface water body	
Ground water	
Other	.008
TOTAL	.098

14. Describe water usage within the plant

Type	Estimated Volume in Million Gallons Per day or Fraction Thereof	
Cooling water	.0864	.087 DISCHARGED TO S. SEWER
Boiler Feed water	.0050	.006 USED IN BOILERS
Process water	.0010	.002 USED IN PRODUCT
Sanitary system*	.0004	.001 USED IN WASH ROOMS
Other	.0017	.002 UNEXPLAINED
TOTAL		.098

15. List volume of discharges or losses other than into navigable waters.

Type	Estimated Volume in Million Gallons Per day or Fraction Thereof
Municipal waste treatment system	.0014
Surface containment	
Underground disposal	
Waste Acceptance firms	
Evaporation	.0017
Consumption	.0010

* Indicate number employees served per day: 80

SECTION II. PLANT PROCESS AND DISCHARGE DESCRIPTION

1. Discharge described below is a. Present [X] b. Proposed new or changed [ ]	2. Implementation schedule [ ]	(Office use only) 3-000751

Name of corporate boundaries within which the point of discharge is located.

State	County	City or Town	6. Discharge Serial No.
3. MASS.	4. BERKSHIRE	5. ADAMS	

State the precise location of the point of discharge.	9. Name of waterway at the point of discharge.
? 7. Latitude NOT KNOWN ___ ___ Degrees; ___ ___ Min; ___ ___ Sec.	FLOOD CONTROL CHANNEL
? 8. Longitude ___ ___ ___ Degrees; ___ ___ Min; ___ ___ Sec.	HOOSAC RIVER

10. Has application for water quality certification or description of impact been made? If so, give date:

Date	Check if certificate is attached to form	Name Issuing Agency
6 (mo) 25 (day) 71 (yr)	[ ]	Mass. Dept. of Public Health Division of Environmental Health Boston, Mass.

11. Narrative description of activity (include terms of general 4-digit Standard Industrial Classification, and specific manufacturing process).

FABRICATING RUBBER PRODUCTS

COATING MATERIALS WITH POLYMERIC COMPOUNDS

12. Standard industrial classification number.	13. Principal product.	14. Amount of principal product produced per day.
3011 405 3069	PRINTERS BLANKETS	800 SQ. YDS.

15. Principal raw material.	16. Amount of principal raw material consumed per day.	17. Number of batch discharges per day.
SYNTHETIC RUBBER	800#	-

18. Average gallons per batch discharge.	19. Date discharge began.	20. Date discharge will begin.
-	? - - - (mo day yr)	- - - (mo day yr)

21. Describe waste abatement practices.

1962 the plant was connected to the Municipal Sewer as approved by the Commonwealth of Massachusetts Department of Health, State House, Boston, Mass.

Only clean water is discharged into the storm sewer that discharges into the flood control channel.

22. PHYSICAL DESCRIPTION OF INTAKE WATER AND DISCHARGE

Intake / Discharge

(Office use only) 3-000751

Discharge Serial No.

Parameter and (Code)	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	AVERAGE (DAILY) (3)	MINIMUM (OPERATING YEAR) (4)	MAXIMUM (OPERATING YEAR) (5)	SAMPLE FREQUENCY (6)	CONTINUOUS MONITORING (7)
Flow (Gallons per day) 00056	90,000		86,000	60,000	100,000	None	None
pH 00400	7		7	-	-	"	"
Temperature (Winter) (°F) 74028	40		70 Estimated			"	"
Temperature (Summer) (°F) 74027	60		80 Estimated			"	"

23. DISCHARGE CONTENTS

PARAMETER	PRESENT	ABSENT	PARAMETER	PRESENT	ABSENT	PARAMETER	PRESENT	ABSENT
Color 00080		X	Aluminum 01105			Nickel 01067		
Turbidity 00070			Antimony 01097			Selenium 01147		
Radioactivity 74050			Arsenic 01002			Silver 01077		
Hardness 00900			Beryllium 01012			Potassium 00937		
Solids 00500			Barium 01007			Sodium 00929		
Ammonia 00610			Boron 01022			Titanium 01152		
Organic Nitrogen 00605			Cadmium 01027			Tin 01102		
Nitrate 00620			Calcium 00916			Zinc 01092		
Nitrite 00615			Cobalt 01037			Algicides 74051		
Phosphorus 00665			Chromium 01034			Oil and Grease 00550		
Sulfate 00945			Copper 01042			Phenols 32730		
Sulfide 00745			Iron 01045			Surfactants 38260		
Sulfite 00740			Lead 01051			Chlorinated Hydrocarbons 74052		
Bromide 71870			Magnesium 00927			Pesticides 74053		
Chloride 00940			Manganese 01055			Fecal Streptococci Bacteria 74054		
Cyanide 00720			Mercury 71900			Coliform Bacteria 74056		
Fluoride 00951			Molybdenum 01062					

PART A

(Note: Submission of Part A is required of all applicants whose processes are listed on page 3 above.)

(Office use only)

3-000751

Discharge Serial No.

INFORMATION REQUIRED OF SPECIFIED INDUSTRIES

	Intake		Discharge									
PARAMETER AND CODE	(1) DAILY AVG. CONCENTRATION/ UNTREATED INTAKE WATER	(2) DAILY AVG. CONCENTRATION/ TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION	(4) MAXIMUM POUNDS PER DAY PER PROCESS UNIT	(5) MAXIMUM POUNDS PER DAY	(6) DAILY AVG. CONCENTRATION	(7) AVERAGE POUNDS PER DAY	SAMPLE TYPE	SAMPLE FREQUENCY	METHOD OF ANALYSIS	CONTINUOUS MONITORING	
								(8)	(9)	(10)	(11)	
ALKALINITY (as $Ca\ CO_3$) 00410								None	None	None	None	
B.O.D. 5-DAY 00310								"	"	"	"	
CHEMICAL OXYGEN DEMAND (C.O.D.) 00340								"	"	"	"	
TOTAL SOLIDS 00500								"	"	"	"	
TOTAL DISSOLVED SOLIDS 70300								"	"	"	"	
TOTAL SUSPENDED SOLIDS 00530								"	"	"	"	
TOTAL VOLATILE SOLIDS 00505								"	"	"	"	
AMMONIA (as N) 00610								"	"	"	"	
KJELDAHL NITROGEN 00625								"	"	"	"	
NITRATE (as N) 00620								"	"	"	"	
PHOSPHORUS TOTAL (as P) 00665								"	"	"	"	

PART B DISCHARGE DESCRIPTION

(Note: Submission of Part B is required of all applicants who are also required to submit Part A. Only those parameters specifically indicated in the instructions are to be reported by a particular industry)

(Office use only) 3-000751

W.R. Grace & Co. Application #
Adams Plant, Adams, Mass. 074 000 3-000751

Discharge Serial No.

B-1. PHYSICAL AND BIOLOGICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-1)

Intake	Discharge						
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) AVERAGE (DAILY)	(4) MINIMUM (OPERATING YEAR)	(5) MAXIMUM (OPERATING YEAR)	(6) SAMPLE FREQUENCY	(7) CONTINUOUS MONITORING
COLOR 00080	0	None	3.3	X	10	D	A
SPECIFIC CONDUCTANCE 00095							
TURBIDITY 00070	0	None	.9	X	5	D	A
FECAL STREPTOCOCCI BACTERIA 74054	0	None	0	X	0	D	A
FECAL COLIFORM BACTERIA 74055	0	None	0	X	0	D	A
TOTAL COLIFORM BACTERIA 74056	8.7	None	0	X	0	D	A

This cooling water originates as a mixture of well and city water and is used at the Kathabars and then discharged to the common storm sewer that discharges into the Hoosic Flood Control Channel.

C.C. C.C.

PART B

(Office use only)
3-000751

Discharge Serial No.

B-2. **CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)**

Intake		Discharge										
PARAMETER AND CODE	UNTREATED INTAKE WATER	TREATED INTAKE WATER	MAXIMUM CONCENTRATION	MAXIMUM POUNDS PER DAY PER PROCESS UNIT	MAXIMUM POUNDS PER DAY	DAILY AVG. CONCENTRATION	AVERAGE POUNDS PER DAY	SAMPLE TYPE	SAMPLE FREQUENCY	METHOD OF ANALYSIS	CONTINUOUS MONITORING
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)
ACIDITY (as $CaCO_3$) 00435											
TOTAL ORGANIC CARBON (T.O.C.) 00680											
TOTAL HARDNESS 00900											
NITRITE (as N) 00615											
ORGANIC NITROGEN 00605											
PHOSPHORUS-ORTHO (as P) 70507											
SULFATE 00945 X	14	None	18.0	15.00	15.00	16.67	12.26	A	D	S	A
SULFIDE 00745											
SULFITE 00740											
BROMIDE 71870											

(Office use only) 3-000751

Discharge Serial No.

B-2. (cont.) **CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)**

Intake		Discharge										
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION	(4) MAXIMUM POUNDS PER DAY PER PROCESS UNIT	(5) MAXIMUM POUNDS PER DAY	(6) DAILY AVG. CONCENTRATION	(7) AVERAGE POUNDS PER DAY	(8) SAMPLE TYPE	(9) SAMPLE FREQUENCY	(10) METHOD OF ANALYSIS	(11) CONTINUOUS MONITORING
NICKEL-TOTAL 01067											
POTASSIUM-TOTAL 00937											
SELENIUM-TOTAL 01147											
SILVER-TOTAL 01077											
SODIUM-TOTAL 00929											
THALLIUM-TOTAL 01059											
TIN-TOTAL 01102											
TITANIUM-TOTAL 01152											
ZINC-TOTAL 01092	.023	None	.050	.042	.042	.037	.031	A	D	S	A
OIL AND GREASE 00550											

(Office use only)

3-000751

Discharge Serial No.

B-2. (cont.) **CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)**

Intake	Discharge										
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION	(4) MAXIMUM POUNDS PER DAY PER PROCESS UNIT	(5) MAXIMUM POUNDS PER DAY	(6) DAILY AVG. CONCENTRATION	(7) AVERAGE POUNDS PER DAY	(8) SAMPLE TYPE	(9) SAMPLE FREQUENCY	(10) METHOD OF ANALYSIS	(11) CONTINUOUS MONITORING
PHENOLS 32730 *	0	None	0.560	.460	.460	0.560	.460	A	D	S	A
SURFACTANTS 38260											
ALGICIDES* 74051											
CHLORINATED HYDRO-CARBONS* (EXCEPT PESTICIDES) 74052											
PESTICIDES* 74053											

*Name specific compound(s) and fill in the required data for each. Use extra blanks at the end of the form and the "Remarks" space as necessary.

PART B

	(Office use only)
	Discharge Serial No.

B-3. RADIOACTIVE PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-3)

Intake	Discharge						
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) AVERAGE (DAILY)	(4) MINIMUM (OPERATING YEAR)	(5) MAXIMUM (OPERATING YEAR)	(6) SAMPLE FREQUENCY	(7) CONTINUOUS MONITORING
ALPHA-TOTAL 01501							
ALPHA COUNTING ERROR 01502							
BETA-TOTAL 03501							
BETA COUNTING ERROR 03502							
GAMMA-TOTAL 05501							
GAMMA COUNTING ERROR 05502							
TRITIUM-TOTAL 07000							
TRITIUM COUNTING ERROR 07001							

B-4. REMARKS

ORIGINAL

REC. ENG. AUG 27 1971

DEPARTMENT OF THE ARMY
NEW ENGLAND DIVISION, CORPS OF ENGINEERS
424 TRAPELO ROAD
WALTHAM, MASSACHUSETTS 02154

IN REPLY REFER TO

NEDOD-P

25 August 1971

W. R. Grace & Company
ATTN: Mr. J. F. Murphy, Jr.
North Avenue
Northwest Industrial Park
Burlington, Massachusetts 01803

Re: Polyfibron Div.
Adams, Mass.

Gentlemen:

Your application for a permit to discharge/deposit under the provisions of the "Refuse Act of 1899" (33 USC 407) has been received at this office. The application number indicated in Inclosure 1 has been assigned to this application and should be referenced in all future correspondence concerning this application.

An initial review of this application has been completed by this office in conjunction with the Regional Office of the Environmental Protection Agency. The results of this review are contained in Inclosure 1 to this correspondence. If this application is incomplete and the submission of additional or revised information is required, it is so noted in this inclosure. In some cases, the particulars of this review may have been discussed with your office by telephone and this inclosure makes only brief reference to the areas requiring further action by your office. The applicant must review these comments and initiate action as appropriate. If you must complete portions of ENG Form 4345-1, Part B, for certain discharges, it is so noted in Inclosure 1. The deadline for filing Part B with the appropriate Corps of Engineers office is 1 October 1971. This office requests that any revised or additional information requested as a result of our initial review, other than Part B, be forwarded as soon as possible to enable continued processing of the application. All application correspondence should be addressed to this office ATTN: NEDOD-P.

If you have not made application for a water quality certification from the appropriate State certifying agency by providing them with a copy of the application made to the Corps of Engineers, you must do so immediately. Any additional information provided to this office as a result of this and subsequent correspondence must also be provided to the State agency. Once you receive appropriate reply from the State certifying agency, you must forward it to this office to enable us to complete processing of the application.

NEDOD-P
W. R. Grace & Company

25 August 1971

Telephone assistance pertaining to the general permit program administration, application status, and specific information pertaining to Section I (ENG Form 4345) of the permit application should be obtained from the assigned engineer at this office. Specific assistance pertaining to water quality matters and the preparation of Section II of the permit application (ENG Form 4345-1) should be obtained by contacting the assigned engineer at EPA.

Sincerely yours,

F. W. MOEHLE
Chief, Permits Branch
Operations Division

2 Incl
1. Application Review
2. Application Forms (as appropriate)

Copy furnished:
Certifying agency

SIC Code Clarification

There has been some misinterpretation in using the Standard Industrial Classification (SIC) code numbers to identify the activities that generate a discharge.

Each industrial discharge must be identified by the appropriate SIC code number except discharges from solely sanitary waste systems.

Where possible, use the SIC code number for the specific process or activity that generates the discharge. Only when this is not possible, use the more general industry SIC number for identifying a discharge. The objective is to define the discharge type as close as possible. When two or more significantly different processes use the same discharge system, the SIC code number for each process must be used. If a discharge is solely the result of steam generation and/or cooling, use the SIC code number 493, Combination Companies and Systems, instead of the particular SIC code number which relates to your specific process or industry.

EXAMPLES:

a.	General Process.	Manufacture of synthetic resins and manmade organic fibers (SIC Number 2824).
b.	Specific Process.	Process discharge from acrylic-nitrile fiber manufacture (SIC Number 2824).
c.	Specific Process.	Cooling water obtained from any source used for cooling extrusion equipment in acrylic-nitrile fiber manufacture (SIC Number 493).
d.	Specific Process.	Boiler blowdown from steam generating plant used to heat process equipment and buildings (SIC Number 493).
e.	Specific Process.	Dyeing of acrylic-nitrile fibers (SIC Number 2269).
f.	Combined Process.	Boiler blowdown (SIC Number 493) and dyeing acrylic-nitrile fibers (SIC Number 2269) - - use both SIC code numbers when identifying the discharge.

APPLICATION REVIEW

Date 25 August 1971

1. Name & Address of Facility
   W. R. Grace & Company
   Harmony Street
   Adams, Mass. 01220

2. Assigned Application Number 3-000751

3. Assigned Engineers

		Telephone Number
a. Corps of Engineers -	John J. Bergen	617-894-2400, Ext. 324
b. EPA -	R. J. Wilder	617-223-7217

4. Corps Review Comments

Section or Discharge serial #	Comments	Required Action by Applicant
a. Sketches	Sketches provided are not adequate and not clear enough for required reproduction. Provide more detailed plan/profile view of discharge and immediate surrounding area. Provide original of plan/profile view of discharge and surrounding area on tracing linen, or vellum, or heavy tracing paper (on 8 x 10-1/2 paper).	
b. Section 1	Review the values in items 13 and 14 and correct or advise why they do not agree.	
c. Sections 1 & 11	A significant difference exists between intake volumes (Sect. 1, item 13) and discharge volumes (Sect. 1, item 15 and Sect. 11, item 22). Review and explain differences.	
d. Serial No. 001	Complete Items 7, 8, 19, 22 and 23, Part A.	
e. Serial No. 001	Critical industrial process/activity. Complete Part B (page 26, subparagraphs 1 and 2) for SIC Nos. 3011 and 3069. A separate Part B is required for each discharge.	
f. Serial No. 001	Discharge to a storm sewer needs completion of required forms.	

CAMBRIDGE

TO: O.J. Ackelsberg/Grace-N.Y. DATE: 9/28/71

FROM: J.F. Murphy, Jr. SUBJECT: Refuse Act 1899
Application #3-000751
Part B

CC: J. Combes/Grace-N.Y.

Enclosed are the original and a copy of Part B of the Corps of Engineers form 4345-1 along with covering letters.

Please forward one set to the Corps of Engineers and the other to Mass. Dept. of Public Health.

Under separate coverage is a set for your files and another for Mr. Combes.

J. F. Murphy, Jr.

JFM/bjt
Enc.

W. R. GRACE & CO., POLYFIBRON DIVISION

62 WHITTEMORE AVENUE, CAMBRIDGE MASSACHUSETTS 02140

GRACE

September 28, 1971

New England Division
Corps of Engineers
424 Trapelo Road
Waltham, Mass. 02154

Attention: Chief Permits Branch
Refuse Act of 1899
Application #3-00751 Part B

Gentlemen:

Please excuse the delay in filing Part B of the application. This was caused by having to answer your letter of August 25 asking for additional information on the original application, and your letter of September 7 informing us that we should have used S.I.C. Code 493, also our desire to carry out an engineering study to see if there was a practical way to eliminate the discharge of the water in the above application.

Enclosed is the data required under Part B. S.I.C. Code #493.

This data is the results of an analysis done for us by Jason M. Cotrell & Associates, 194 Worcester Road, Wellesley, Mass.

Very truly yours,

J. F. Murphy, Jr., Director
Engineering & Purchasing
Applicants Authorized Agent

JFM/bjt
Enc.

cc: Mr. John Collins/Div. of Environmental Health/Boston
Mr. O.J. Ackelsberg/Grace-N.Y.
Mr. J.J. Combes/Grace-N.Y.
Mr. O.M. Favorito/Cambridge

W. R. GRACE & CO., POLYFIBRON DIVISION

WHITTEMORE AVENUE, CAMBRIDGE MASSACHUSETTS 02140

CHARGE

September 28, 1971

Mr. John C. Collins, Director
Mass. Dept. of Public Health
Division of Environmental Health
600 Washington Street
Room 214
Boston, Mass. 02111

Refuse Act of 1899
Application #3-00751 Part B

Gentlemen:

Enclosed is a copy of Part B that has been forwarded to the New England Division of the Corps of Engineers.

We regret that we are late in filing; this was caused by the Corps of Engineers asking for additional information and our desire to carry out an engineering study to see if there was a practical way to eliminate the discharge of the water in the above application.

The data shown is the results of an analysis done for us by Jason M. Cotrell & Associates, 194 Worcester Road, Wellesley, Mass.

Very truly yours,

J. F. Murphy, Jr. /bt

J. F. Murphy, Jr., Director
Engineering & Purchasing

JFM/bjt
Enc.

CAMBRIDGE

TO: J.J. Combes/Grace-N.Y. DATE: 9/28/71

FROM: J.F. Murphy, Jr. SUBJECT: Refuse Act 1899 - Adams Plant
Adams, Mass.

CC:

We have been assigned the following number 074-000-3-751 from the New England Division of the Corps of Engineers.

So far we have not received a permit.

J. F. Murphy, Jr.

.JFM/bjt

PART B DISCHARGE DESCRIPTION

Note: Submission of Part B is required of all applicants who are required to submit Part A. Only those parameters specifically listed in the instructions are to be reported by a particular industry)

(Office use only) 3-000751

W.R. Grace & Co.
Adams Plant, Adams, Mass.

Application # 074 000 3-000751

Discharge Serial No.

B-1. PHYSICAL AND BIOLOGICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-1)

	Intake	Discharge					
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) AVERAGE (DAILY)	(4) MINIMUM (OPERATING YEAR)	(5) MAXIMUM (OPERATING YEAR)	(6) SAMPLE FREQUENCY	(7) CONTINUOUS MONITORING
COLOR 00080	0	None	3.3	X	10	D	A
SPECIFIC CONDUCTANCE 00095							
TURBIDITY 00070	0	None	.9	X	5	D	A
FECAL STREPTOCOCCI BACTERIA 74054	0	None	0	X	0	D	A
FECAL COLIFORM BACTERIA 74055	0	None	0	X	0	D	A
TOTAL COLIFORM BACTERIA 74056	8.7	None	0	X	0	D	A

This cooling water originates as a mixture of well and city water and is used at the Kathabars and then discharged to the common storm sewer that discharges into the Hoosic Flood Control Channel.

PART B

(Office use only)
3-000751

Discharge Serial No.

B-2. CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

Intake		Discharge										
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
ACIDITY (as $CaCO_3$) 00435											
TOTAL ORGANIC CARBON (T.O.C.) 00680											
TOTAL HARDNESS 00900											
NITRITE (as N) 00615											
ORGANIC NITROGEN 00605											
PHOSPHORUS-ORTHO (as P) 70507											
SULFATE 00945 X	14	None	18.0	15.00	15.00	16.67	12.26	A	D	S	A
SULFIDE 00745											
SULFITE 00740											
BROMIDE 71870											

EPA FORM 4345-1 JUN 71

PART B

(Office use only)

3-000751

Discharge Serial No.

V. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

	Intake	Discharge									
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION	(4) MAXIMUM POUNDS PER DAY PER PROCESS UNIT	(5) MAXIMUM POUNDS PER DAY	(6) DAILY AVG. CONCENTRATION	(7) AVERAGE POUNDS PER DAY	(8) SAMPLE TYPE	(9) SAMPLE FREQUENCY	(10) METHOD OF ANALYSIS	(11) CONTINUOUS MONITORING
CHLORIDE 00940	2.17	None	3.50	2.88	2.88	2.58	2.16	A	D	S	A
CYANIDE 00720											
FLUORIDE 00951											
ALUMINUM-TOTAL 01105											
ANTIMONY-TOTAL 01097											
ARSENIC-TOTAL 01002											
BARIUM-TOTAL 01007											
BERYLLIUM-TOTAL 01012											
BORON-TOTAL 01022											
CADMIUM-TOTAL 01027											

(Continued from front)

3-060751

CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

PARAMETER AND CODE	Intake: UNTREATED INTAKE WATER (1)	Intake: TREATED INTAKE WATER (2)	Discharge: MAXIMUM CONCENTRATION (3)	Discharge: MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	Discharge: MAXIMUM POUNDS PER DAY (5)	Discharge: DAILY AVG. CONCENTRATION (6)	Discharge: AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
CALCIUM-TOTAL 00916											
CHROMIUM-TOTAL 01034	0	None	0	0	0	0	0	A	D	S	A
COBALT-TOTAL 01037											
COPPER-TOTAL 01042											
IRON-TOTAL 01045											
LEAD-TOTAL 01051											
MAGNESIUM-TOTAL 00927											
MANGANESE-TOTAL 01055											
MERCURY-TOTAL 71900											
MOLYBDENUM-TOTAL 01062											

PART B

(Office use only) 3-000751

Discharge Serial No.

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

	Intake	Discharge									
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION	(4) MAXIMUM POUNDS PER PROCESS UNIT	(5) MAXIMUM POUNDS PER DAY	(6) DAILY AVG. CONCENTRATION	(7) AVERAGE POUNDS PER DAY	(8) SAMPLE TYPE	(9) SAMPLE FREQUENCY	(10) METHOD OF ANALYSIS	(11) CONTINUOUS MONITORING
NICKEL-TOTAL 01067											
POTASSIUM-TOTAL 00937											
SELENIUM-TOTAL 01147											
SILVER-TOTAL 01077											
SODIUM-TOTAL 00929											
THALLIUM-TOTAL 01059											
TIN-TOTAL 01102											
TITANIUM-TOTAL 01152											
ZINC-TOTAL 01092	.023	None	.050	.042	.042	.037	.031	A	D	S	A
OIL AND GREASE 00550											

PART B

(Office use only)

3-000751

Discharge Serial No.

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

Intake		Discharge									
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
PHENOLS 32730	0	None	0.560	.460	.460	0.560	.460	A	D	S	A
SURFACTANTS 38260											
ALGICIDES* 74051											
CHLORINATED HYDRO-CARBONS* (EXCEPT PESTICIDES) 74052											
PESTICIDES* 74053											

*Name specific compound(s) and fill in the required data for each. Use extra blanks at the end of the form and the "Remarks" space as necessary.

PART D

(Office use only)

Discharge Serial No.

B-3. RADIOACTIVE PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-3)

	Intake	Discharge						
PARAMETER AND CODE	UNTREATED INTAKE WATER	TREATED INTAKE WATER	AVERAGE (DAILY)	MINIMUM (OPERATING YEAR)	MAXIMUM (OPERATING YEAR)	SAMPLE FREQUENCY	CONTINUOUS MONITORING	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	
ALPHA-TOTAL 01501				X				
ALPHA COUNTING ERROR 01502				X				
BETA-TOTAL 03501				X				
BETA COUNTING ERROR 03502				X				
GAMMA-TOTAL 05501				X				
GAMMA COUNTING ERROR 05502				X				
TRITIUM-TOTAL 07000				X				
TRITIUM COUNTING ERROR 07001				X				

B-4. REMARKS

PART B - DISCHARGE DESCRIPTION

Note: Submission of Part B is required of all applicants who are required to submit Part A. Only those parameters specifically indicated in the instructions are to be reported by a particular industry)

(Office use only)

3-000751

W.R. Grace & Co.
Adams Plant, Adams, Mass.

Application # 074 000 3 000751

Discharge Serial No.

B-1. PHYSICAL AND BIOLOGICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-1)

	Intake	Discharge					
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) AVERAGE (DAILY)	(4) MINIMUM (OPERATING YEAR)	(5) MAXIMUM (OPERATING YEAR)	(6) SAMPLE FREQUENCY	(7) CONTINUOUS MONITORING
COLOR 00080	5.33	None	0	X	0	D	A
SPECIFIC CONDUCTANCE 00095							
TURBIDITY 00070	0	None	3	X	6	D	A
FECAL STREPTOCOCCI BACTERIA 74054	0	None	0	X	0	D	A
FECAL COLIFORM BACTERIA 74055	0	None	0	X	0	D	A
TOTAL COLIFORM BACTERIA 74056	0	None	4,833	X	5,070	D	A

* Samples were taken during the peak period of day.
This cooling water comes from a grinder and discharges into a sump pump that in turn discharges it into the common storm sewer that discharges into the Hoosic Flood Control Channel.

PART D

(Office use only)

3-000751

Discharge Serial No.

B-2. CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

Intake		Discharge										
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION	(4) MAXIMUM POUNDS PER DAY PER PROCESS UNIT	(5) MAXIMUM POUNDS PER DAY	(6) DAILY AVG. CONCENTRATION	(7) AVERAGE POUNDS PER DAY	(8) SAMPLE TYPE	(9) SAMPLE FREQUENCY	(10) METHOD OF ANALYSIS	(11) CONTINUOUS MONITORING
ACIDITY (as $CaCO_3$) 00435											
TOTAL ORGANIC CARBON (T.O.C.) 00680											
TOTAL HARDNESS 00900											
NITRITE (as N) 00615											
ORGANIC NITROGEN 00605											
PHOSPHORUS-ORTHO (as P) 70507											
SULFATE 00945	17.67	None	18.0	.396	.396	16.67	.368	A	D	S	A
SULFIDE 00745											
SULFITE 00740											
BROMIDE 71870											

PART B

(Office use only)

3-000751

Discharge Serial No.

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

	Intake	Discharge									
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
CHLORIDE 00940	3.00	None	5.00	.110	.110	4.83	.106	A	D	S	A
CYANIDE 00720											
FLUORIDE 00951											
ALUMINUM-TOTAL 01105											
ANTIMONY-TOTAL 01097											
ARSENIC-TOTAL 01002											
BARIUM-TOTAL 01007											
BERYLLIUM-TOTAL 01012											
BORON-TOTAL 01022											
CADMIUM-TOTAL 01027											

(Office use only)

3-000751

Discharge Serial No.

S-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table S-2)

	Intake		Discharge									
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
CALCIUM-TOTAL 00916											
CHROMIUM-TOTAL 01034	0	None	.00	.00	.00	.00	.00	A	D	S	A
COBALT-TOTAL 01037											
COPPER-TOTAL 01042											
IRON-TOTAL 01045											
LEAD-TOTAL 01051											
MAGNESIUM-TOTAL 00927											
MANGANESE-TOTAL 01055											
MERCURY-TOTAL 71900											
MOLYBDENUM-TOTAL 01062											

(Office use only) 3-000751

Discharge Serial No.

(cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

PARAMETER AND CODE	Intake: UNTREATED INTAKE WATER (1)	Intake: TREATED INTAKE WATER (2)	Discharge: MAXIMUM CONCENTRATION (3)	Discharge: MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	Discharge: MAXIMUM POUNDS PER DAY (5)	Discharge: DAILY AVG. CONCENTRATION (6)	Discharge: AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
NICKEL-TOTAL 01067											
POTASSIUM-TOTAL 00937											
SELENIUM-TOTAL 01147											
SILVER-TOTAL 01077											
SODIUM-TOTAL 00929											
THALLIUM-TOTAL 01059											
TIN-TOTAL 01102											
TITANIUM-TOTAL 01152											
ZINC-TOTAL 01092	.073	None	.12	.003	.003	.077	.002	A	D	S	A
OIL AND GREASE 00550											

PART B

(Office use only)

3-000751

Discharge Serial No.

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

Intake		Discharge										
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
PHENOLS 32730	0.0	None	.040	.009	.009	.040	.009	A	D	S	A
SURFACTANTS 38260											
ALGICIDES* 74051											
CHLORINATED HYDRO-CARBONS* (EXCEPT PESTICIDES) 74052											
PESTICIDES* 74053											

*Name specific compound(s) and fill in the required data for each. Use extra blanks at the end of the form and the "Remarks" space as necessary.

PART B

(Office use only) 3-000751

Discharge Serial No.

RADIOACTIVE PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-3)

PARAMETER AND CODE	Untreated Intake Water (1)	Treated Intake Water (2)	Discharge: Average (Daily) (3)	Discharge: Minimum (Operating Year) (4)	Discharge: Maximum (Operating Year) (5)	Discharge: Sample Frequency (6)	Discharge: Continuous Monitoring (7)
ALPHA-TOTAL 01501				X			
ALPHA COUNTING ERROR 01502				X			
BETA-TOTAL 03501				X			
BETA COUNTING ERROR 03502				X			
GAMMA-TOTAL 05501				X			
GAMMA COUNTING ERROR 05502				X			
TRITIUM-TOTAL 07000				X			
TRITIUM COUNTING ERROR 07001				X			

B-4. REMARKS

John - file

W. R. GRACE & CO., POLYFIBRON DIVISION

62 WHITTEMORE AVENUE, CAMBRIDGE MASSACHUSETTS 02140

GRACE

September 24, 1971

Mr. John C. Collins, Director
Mass. Dept. of Public Health
Division of Environmental Health
600 Washington Street
Room 214
Boston, Mass. 02111

Refuse Act of 1899
Application #3-00751

Gentlemen:

On August 25th we received a review of our application from the Corps of Engineers. In their review they asked for additional data. This additional information required that we revise the application.

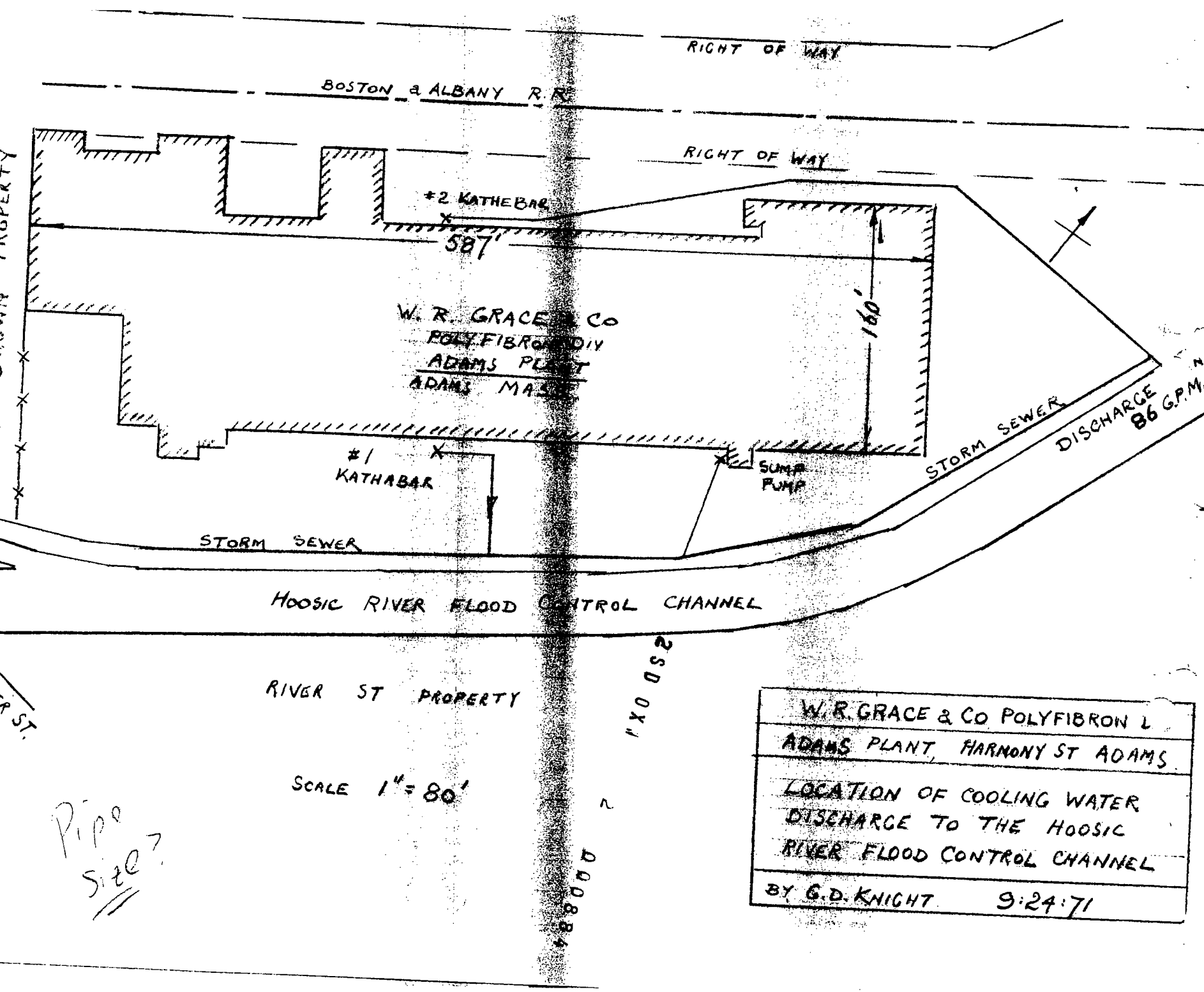
Enclosed is a copy of the revised application, and a copy of our letter to the Corps of Engineers.

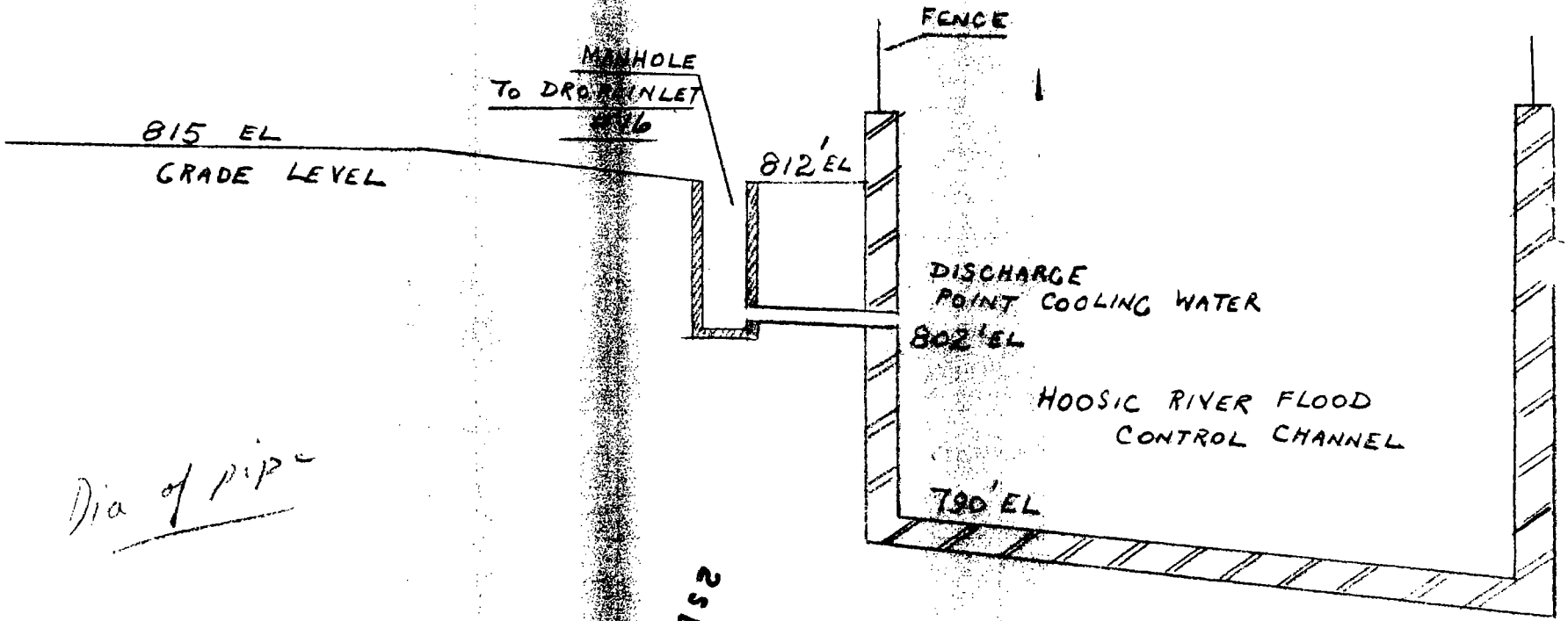
Very truly yours,

J.F. Murphy, Jr.
Director
Engineering & Purchasing

JFM/bjt
Enc.

cc: New England Division
Corps of Engineers


RIGHT OF WAY
BOSTON & ALBANY R.R.
RIGHT OF WAY
#2 KATHEBAR
587'
160'
W. R. GRACE & Co
POLYFIBRON DIV
ADAMS PLANT
ADAMS MASS
#1
KATHABAR
SUMP
PUMP
STORM SEWER
DISCHARGE
86 G.P.M.
STORM SEWER
HOOSIC RIVER FLOOD CONTROL CHANNEL
RIVER ST PROPERTY
SCALE 1" = 80'
W.R. GRACE & CO POLYFIBRON L
ADAMS PLANT, HARMONY ST ADAMS
LOCATION OF COOLING WATER
DISCHARGE TO THE HOOSIC
RIVER FLOOD CONTROL CHANNEL
BY G.D. KNIGHT 9:24:71



W. R. GRACE & Co. POLYFIBRON DIV
ADAMS PLANT, ADAMS MASS
APPROXIMATE X SECTION SHOWING ELEVATIONS COOLING WATER DISCHARGE.
G. D. KNIGHT 9:24:71

PEVISION #1 no check

FORM APPROVED
OMB NO. 49-R 0408

DEPARTMENT OF THE ARMY, CORPS OF ENGINEERS

APPLICATION FOR PERMIT TO DISCHARGE OR WORK IN NAVIGABLE WATERS AND THEIR TRIBUTARIES

2SD 0X1 2 000884

SECTION I. GENERAL INFORMATION

1. State	Application Number (to be assigned by Corps of Engineers)			
	2SD 0X1	2	000884	
	Div.	Dist.	Type	Sequence No.

2. Name of applicant and title of signing official

W.R. Grace & Co.
R.D. Goodall Corp. Vice President

3. Mailing address of applicant

W.R. Grace & Co.
3 Hanover Square
New York, N.Y. 10004

4. Name, address, telephone number and title of applicant's authorized agent for permit application coordination and correspondence.

Mr. J.F. Murphy, Jr.
Director of Engineering & Purchasing
W.R. Grace & Co., Polyfibron Division
North Ave - Northwest Industrial Park
Burlington, Mass. 01803
Tel. (617) 272-4060

NOTE TO APPLICANT: Refer to the pamphlet entitled "Permits for Work and Structures in and for Discharges or Deposits into Navigable Waters" before attempting to complete this form.

Required Information

a. All information contained in this application will, upon request, be made available to the public for inspection and copying. A separate sheet entitled "Confidential Answers" must be used to set out information which is considered by the applicant to constitute trade secrets or commercial or financial information of a confidential nature. The information must clearly indicate the item number to which it applies. Confidential treatment can be considered only for that information for which a specific written request of confidentiality has been made on the attached sheet. However, in no event will identification of the contents and frequency of a discharge be recognized as confidential or privileged information.

b. The applicant shall furnish such supplementary information as is required by the District Engineer in order to evaluate fully an application.

c. If additional space is needed for a complete response to any item on this form, attach a sheet entitled "Additional Information." Indicate on that sheet the item numbers to which answers apply.

d. Drawings required by items 20 and 21 should be attached to this application. Other papers which must be attached to this application include, if applicable, copies of a water quality certification or a written communication which describes water quality impact (see Item 22 and Item 10 of Section II below), the additional information sheet(s) in "c" above, and the confidential information sheet described in "a" above.

Fees

If any discharge or deposit is involved, an application fee of $100 must be submitted with this application. An additional $50 is required for each additional point of discharge or deposit.

Signature

a. If a discharge is involved, an application submitted by a corporation must be signed by the principal executive officer of that corporation or by an official of the rank of corporate vice president or above who reports directly to such principal executive officer and who has been designated by the principal executive officer to make such applications on behalf of the corporation. In the case of a partnership or a sole proprietorship, the application must be signed by a general partner or the proprietor. Other signature requirements are discussed in the pamphlet.

b. If no discharge is involved, an application may be signed by the applicant or his authorized agent.

Application is hereby made for a permit or permits to authorize the activities described herein. I certify that I am familiar with the information contained in this application, and that to the best of my knowledge and belief such information is true, complete, and accurate.

Robert R. Goodall

Signature of Applicant

18 U.S.C. Section 1001 provides that:

Whoever, in any matter within the jurisdiction of any department or agency of the United States knowingly and wilfully falsifies, conceals or covers up by any trick, scheme, or device a material fact, or makes any false, fictitious or fraudulent statements or representations, or makes or uses any false writing or document knowing same to contain any false, fictitious or fraudulent statement or entry, shall be fined not more than $10,000 or imprisoned not more than five years, or both.

FOR CORPS OF ENGINEERS USE ONLY

Acronym name of applicant GRA

Are discharge structures Major? ☐ Minor? ☐ N/A? ☐

	day	mo	yr
Date received, form not complete	22	JUN	71
Date received, form complete but without certificate	— —	— — —	— —
Date received, form complete	— —	— — —	— —
Date of Cert./Ltr.	— —	— — —	— —

Date sent to EPA, form not complete 31 JAN 72

Date sent to EPA, NOAA, D/I, AEC, FPC in complete form — — — — — —

ENG FORM 4345 1 OCT 1971

5. Date 9 24 71
mo day yr

(Office use only)
2SD 0X[redacted] 2 000884

6. Check type of application: a. Original ☐ b. Revision ☒

7. Number of original application
[redacted]

8. Name of facility where discharge or construction will occur.

Adams Plant
W.R. Grace & Co.
Polyfibron Division

9. Full mailing address of facility named in item 8 above.

Harmony Street
Adams, Mass. 01220

10. Names and mailing addresses of all adjoining property owners whose property also adjoins the waterway.

L.L. Brown
Harmony St.
Adams

11. Check to indicate the nature of the proposed activity:
a. Dredging ☐ b. Construction ☐ c. Construction with Discharge ☐ b. Discharge only ☒

12. If activity is temporary in nature, estimate its duration in months. NA

If application is for a discharge:

13. List intake sources

Source	Estimated Volume in Million Gallons Per day or Fraction Thereof
Municipal or private water supply system	.090
Surface water body	.
Ground water	.
Other	.008
	Total .098 = 0.196

14. Describe water usage within the plant

Type	Estimated Volume in Million Gallons Per day or Fraction Thereof
Cooling water	.087 Disch. to sewer
Boiler Feed water	.006 In boilers
Process water	.002 In Product
Sanitary system*	.001 In Wash Rooms
Other ( )	.002 Unexplained
	.098

+0.098 ? NOT EQU

15. List volume of discharges or losses other than into navigable waters.

Type	Estimated Volume in Million Gallons Per day or Fraction Thereof
Municipal waste treatment system	.0014
Surface containment	.
Underground disposal	.
Waste Acceptance firms	.
Evaporation	.0017
Consumption	.0010

+ SECTION II item 22 = 0.0901 NOTE

086

* Indicate number employees served per day 80

If structures exist, or dredging, filling or other construction will occur, the precise location of the activity must be described.

(Office use only) 2SU 0X 2 000884

a. Name the corporate boundaries within which the structures exist or the activity will occur.

16. State: Mass. 17. County: Berkshire 18. City or Town: Adams

b. Name of waterway at the location of the activity

19. Flood Control Channel - Hoosic River

20. Maps and sketches which show the location and character of each structure or activity, including any and all outfall devices, dispersive devices, and non-structural points of discharge, must be attached to this application.

21. For construction or work in navigable waters for which a separate permit is sought under 33 U.S.C. 403, the character of each structure must be fully shown on detailed plans to be submitted with this application. Note on the drawings those structures for which separate discharge information (Section II of this form) has been submitted.

22. List all approvals or denials granted by Federal, interstate, State or local agencies for any structures, construction, discharges or deposits described in this application.

Type of document	Id. No.	Date	Issuing Agency
NONE			

23. Check if facility existed or was lawfully under construction prior to April 3, 1970. [X]

24. If dredging or filling will occur:

State the type of materials involved, their volume in cubic yards, and the proposed method of measurement.

~~NONE~~ NA

25. Describe the proposed method of instrumentation which will be used to measure the volume of any solids which may be deposited and to determine its effect upon the waterway.

Do not at present plan any only fresh water discharge

NONE

26. State rates and periods of deposition described in Item 25.

86400 Average Gallons/Day

SECTION II. PLANT PROCESS AND DISCHARGE DESCRIPTION

1. Discharge described below is a. Present [X] b. Proposed new or changed [ ]	2. Implementation schedule [ ]	(Office use only) 2SD 0XW 2 000884

Name of corporate boundaries within which the point of discharge is located.

State	County	City or Town	6. Discharge Serial No.
3. Mass.	4. Berkshire	5. Adams	001

State the precise location of the point of discharge.

7. Latitude 42 Degrees; 37 Min; 18 Sec. N

8. Longitude 73 Degrees; 07 Min; 18 Sec. W

9. Name of waterway at the point of discharge.

Flood Control Channel
Hoosic River

10. Has application for water quality certification or description of impact been made? If so, give date:

Date: 6 mo 25 day 71 yr

Check if certificate is attached to form [ ]

Name Issuing Agency: Mass. Dept. of Public Health
Div. of Environmental Health
Boston, Mass.

11. Narrative description of activity (include terms of general 4-digit Standard Industrial Classification, and specific manufacturing process).

Fabricating Rubber Products

Coating Materials with Polymeric Compounds

Description of activity resulting in the discharge

12. Standard industrial classification number.	13. Principal product.	14. Amount of principal product produced per day.
3069	Printers Blankets	800 Sq. Yds.

15. Principal raw material.	16. Amount of principal raw material consumed per day.	17. Number of batch discharges per day.
Synthetic Rubber	800#	-NA

18. Average gallons per batch discharge.	19. Date discharge began.	20. Date discharge will begin.
NA	7 mo 1 day 46 yr	NA mo day yr

21. Describe waste abatement practices.

1962 the plant was connected to the Municipal Sewer as approved by the Commonwealth of Massachusetts, Dept. of Health, State House, Boston.

Only clean water is discharged into the storm sewer that discharges into the flood control channel.

22. PHYSICAL DESCRIPTION OF INTAKE WATER AND DISCHARGE

Intake / Discharge

(Office use only) [redacted]

Discharge Serial No. 001

Parameter and (Code)	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	AVERAGE (DAILY) (3)	MINIMUM (OPERATING YEAR) (4)	MAXIMUM (OPERATING YEAR) (5)	SAMPLE FREQUENCY (6)	CONTINUOUS MONITORING (7)
Flow (Gallons per day) 00056	90,000	None	86,000	60,000	100,000	None	None
pH 00400	7	None	7	7	7	None	None
Temperature (Winter) (°F) 74028	40	None	70(Est)	70(Est)	70(Est)	None	None
Temperature (Summer) (°F) 74027	60	None	82°F	80°F Estimate	80°F Estimate	None	None

23. DISCHARGE CONTENTS

PARAMETER	PRESENT	ABSENT	PARAMETER	PRESENT	ABSENT	PARAMETER	PRESENT	ABSENT
Color 00080		X	Aluminum 01105		X	Nickel 01067		X
Turbidity 00070		X	Antimony 01097		X	Selenium 01147		X
Radioactivity 74050		X	Arsenic 01002		X	Silver 01077		X
Hardness 00900		X	Beryllium 01012		X	Potassium 00937		X
Solids 00500		X	Barium 01007		X	Sodium 00929		X
Ammonia 00610		X	Boron 01022		X	Titanium 01152		X
Organic Nitrogen 00605		X	Cadmium 01027		X	Tin 01102		X
Nitrate 00620		X	Calcium 00916		X	Zinc 01092		X
Nitrite 00615		X	Cobalt 01037		X	Algicides 74051		X
Phosphorus 00665		X	Chromium 01034		X	Oil and Grease 00550		X
Sulfate 00945		X	Copper 01042		X	Phenols 32730		X
Sulfide 00745		X	Iron 01045		X	Surfactants 38260		X
Sulfite 00740		X	Lead 01051		X	Chlorinated Hydrocarbons 74052		X
Bromide 71870		X	Magnesium 00927		X	Pesticides 74053		X
Chloride 00940		X	Manganese 01055		X	Fecal Streptococci Bacteria 74054		X
Cyanide 00720		X	Mercury 71900		X	Coliform Bacteria 74056		X
Fluoride 00951		X	Molybdenum 01062		X			

24a. Have all known hazardous or potentially hazardous substances in your plant been inventoried?

[X] Yes [ ] No 2SD 0XW 2 000884

24b. If yes, have steps been taken to insure that there exists no possibility of any such known hazardous or potentially hazardous substance entering this discharge?

[X] Yes [ ] No

25. Remarks.

In the unlikely event of a drum spill some material could get into the storm sewer.

The information above completes the basic reporting requirements which are required of all applicants. Those applicants whose discharge results from an activity included within any of the Standard Industrial Classification Code (SIC Code) categories listed below must complete Part A of this form as well.

CRITICAL INDUSTRIAL GROUPS

SIC	098	FISH HATCHERIES, FARMS, AND PRESERVES
SIC	10-14	DIVISION B – MINING
SIC	201	MEAT PRODUCTS
SIC	202	DAIRY PRODUCTS
SIC	203	CANNED PRESERVED FRUITS, VEGETABLES (EXCEPT SEAFOODS, SIC 2031 AND 2036)
SIC	2031, 2036	CANNED AND CURED FISH AND SEAFOODS; FRESH OR FROZEN PACKAGED FISH AND SEAFOODS
SIC	204	GRAIN MILL PRODUCTS
SIC	206	SUGAR
SIC	207	CONFECTIONARY AND RELATED PRODUCTS
SIC	208	BEVERAGES
SIC	209	MISCELLANEOUS FOOD PREPARATIONS AND KINDRED PRODUCTS
SIC	22	TEXTILE MILL PRODUCTS
SIC	23	APPAREL AND OTHER FINISHED PRODUCTS MADE FROM FABRICS AND SIMILAR MATERIALS
SIC	242	SAWMILLS AND PLANING MILLS
SIC	2432	VENEER AND PLYWOOD
SIC	2491	WOOD PRESERVING
SIC	26	PAPER AND ALLIED PRODUCTS
SIC	281	INDUSTRIAL INORGANIC AND ORGANIC CHEMICALS (EXCEPT SIC 2818)
SIC	2818	INDUSTRIAL ORGANIC CHEMICALS
SIC	282	PLASTICS MATERIALS AND SYNTHETIC RESINS, SYNTHETIC RUBBER, SYNTHETIC AND OTHER MAN-MADE FIBERS, EXCEPT GLASS
SIC	283	DRUGS
SIC	284	SOAP, DETERGENTS, AND CLEANING PREPARATIONS, PERFUMES, COSMETICS, AND OTHER TOILET PREPARATIONS
SIC	285	PAINTS, VARNISHES, LACQUERS, ENAMELS, AND ALLIED PRODUCTS
SIC	2871	FERTILIZERS
SIC	2879	AGRICULTURAL PESTICIDES, AND OTHER AGRICULTURAL CHEMICALS, NOT ELSEWHERE CLASSIFIED
SIC	2891	ADHESIVES AND GELATIN
SIC	2892	EXPLOSIVES
SIC	29	PETROLEUM REFINING AND RELATED INDUSTRIES
SIC	3011, 3069	TIRES AND INNER TUBES; FABRICATED RUBBER PRODUCTS, NOT ELSEWHERE CLASSIFIED
SIC	3079	MISCELLANEOUS PLASTICS PRODUCTS
SIC	311	LEATHER TANNING AND FINISHING
SIC	32	STONE, CLAY, GLASS, AND CONCRETE PRODUCTS
SIC	331	BLAST FURNACES, STEEL WORKS, AND ROLLING AND FINISHING MILLS
SIC	332	IRON AND STEEL FOUNDRIES
SIC	333, 334	PRIMARY SMELTING AND REFINING OF NONFERROUS METALS; SECONDARY SMELTING AND REFINING OF NONFERROUS METALS
SIC	336	NONFERROUS FOUNDRIES
SIC	347	COATING, ENGRAVING, AND ALLIED SERVICES
SIC	35	MACHINERY, EXCEPT ELECTRICAL
SIC	36	ELECTRICAL MACHINERY, EQUIPMENT, AND SUPPLIES
SIC	37	TRANSPORTATION EQUIPMENT (EXCEPT SHIP BUILDING AND REPAIRING, SIC 3731)
SIC	3731	SHIP BUILDING AND REPAIRING
SIC	491	ELECTRIC COMPANIES AND SYSTEMS
SIC	(493)	COMBINATION COMPANIES AND SYSTEMS

PART A

(Note: Submission of Part A is required of all applicants whose processes are listed on page 3 above.)

(Office use only) 2 S 0 0 X 1 [redacted] 2 0 0 0 8 3 4

Discharge Serial No. 001

INFORMATION REQUIRED OF SPECIFIED INDUSTRIES

	Intake		Discharge									
PARAMETER AND CODE	(1) DAILY AVG. CONCENTRATION UNTREATED INTAKE WATER	(2) DAILY AVG. CONCENTRATION TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION PER PROCESS UNIT	(4) MAXIMUM POUNDS PER DAY	(5) DAILY AVG. CONCENTRATION	(6) AVERAGE POUNDS PER DAY	(7) SAMPLE TYPE	(8) SAMPLE FREQUENCY	(9) METHOD OF ANALYSIS	(10) CONTINUOUS MONITORING	(11)
ALKALINITY (as Ca CO_3) 00410	Not Known	Not Known	Not Known	Not Known	Not Known	Not Known	Not Known	None	None	None	None
B.O.D. 5-DAY 00310	"	"	"	"	"	"	"	"	"	"	"
CHEMICAL OXYGEN DEMAND (C.O.D.) 00340	"	"	"	"	"	"	"	"	"	"	"
TOTAL SOLIDS 00500	"	"	"	"	"	"	"	"	"	"	"
TOTAL DISSOLVED SOLIDS 70300	"	"	"	"	"	"	"	"	"	"	"
TOTAL SUSPENDED SOLIDS 00530	"	"	"	"	"	"	"	"	"	"	"
TOTAL VOLATILE SOLIDS 00505	"	"	"	"	"	"	"	"	"	"	"
AMMONIA (as N) 00610	"	"	"	"	"	"	"	"	"	"	"
KJELDAHL NITROGEN 00625	"	"	"	"	"	"	"	"	"	"	"
NITRATE (as N) 00620	"	"	"	"	"	"	"	"	"	"	"
PHOSPHORUS TOTAL (as P) 00665	"	"	"	"	"	"	"	"	"	"	"

PART B DISCHARGE DESCRIPTION

(Note: Submission of Part B is required of all applicants who are also required to submit Part A. Only those parameters specifically indicated in the instructions are to be reported by a particular industry)

(Office use only) 2 S D 0 X W 2 000884

W.R. Grace & Co.
Adams Plant, Adams, Mass.

Application # 074 000 3 000751

Discharge Serial No. 001

B-1. PHYSICAL AND BIOLOGICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-1)

	Intake	Discharge					
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) AVERAGE (DAILY)	(4) MINIMUM (OPERATING YEAR)	(5) MAXIMUM (OPERATING YEAR)	(6) SAMPLE FREQUENCY	(7) CONTINUOUS MONITORING
COLOR 00080	5.33	None	0	X	0	D	A
SPECIFIC CONDUCTANCE 00095							
TURBIDITY 00070	0	None	3	X	6	D	A
FECAL STREPTOCOCCI BACTERIA 74054	0	None	0	X	0	D	A
FECAL COLIFORM BACTERIA 74055	0	None	0	X	0	D	A
TOTAL COLIFORM BACTERIA 74056	0	None	4,833	X	5,070	D	A

* Samples were taken during the peak period of day.
This cooling water comes from a grinder and discharges into a sump pump that in turn discharges it into the common storm sewer that discharges into the Hoosic Flood Control Channel.

PART B

(Office use only) 2 S0 0 X W 2 000884

Discharge Serial No. 001

B-2. CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

	Intake		Discharge									
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION	(4) MAXIMUM POUNDS PER DAY PER PROCESS UNIT	(5) MAXIMUM POUNDS PER DAY	(6) DAILY AVG. CONCENTRATION	(7) AVERAGE POUNDS PER DAY	(8) SAMPLE TYPE	(9) SAMPLE FREQUENCY	(10) METHOD OF ANALYSIS	(11) CONTINUOUS MONITORING
ACIDITY (as $CaCO_3$) 00435											
TOTAL ORGANIC CARBON (T.O.C.) 00680											
TOTAL HARDNESS 00900											
NITRITE (as N) 00615											
ORGANIC NITROGEN 00605											
PHOSPHORUS-ORTHO (as P) 70507											
SULFATE 00945	17.67	None	18.0	.396	.396	16.67	.368	A	D	S	A
SULFIDE 00745											
SULFITE 00740											
BROMIDE 71870											

PART B

(Office use only) 2 S D 0 X W 2 000884

Discharge Serial No. 001

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

Intake		Discharge										
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
CHLORIDE 00940	3.00	None	5.00	.110	.110	4.83	.106	A	D	S	A
CYANIDE 00720											
FLUORIDE 00951											
ALUMINUM-TOTAL 01105											
ANTIMONY-TOTAL 01097											
ARSENIC-TOTAL 01002											
BARIUM-TOTAL 01007											
BERYLLIUM-TOTAL 01012											
BORON-TOTAL 01022											
CADMIUM-TOTAL 01027											

PART B

(Office use only) 2 SD 0 X W 2 000884

Discharge Serial No. 001

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

	Intake	Discharge									
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
CALCIUM-TOTAL 00916											
CHROMIUM-TOTAL 01034	0	None	.00	.00	.00	.00	.00	A	D	S	A
COBALT-TOTAL 01037											
COPPER-TOTAL 01042											
IRON-TOTAL 01045											
LEAD-TOTAL 01051											
MAGNESIUM-TOTAL 00927											
MANGANESE-TOTAL 01055											
MERCURY-TOTAL 71900											
MOLYBDENUM-TOTAL 01062											

PART B

(Office use only) 2 S D 0 X W 2 000884

Discharge Serial No. 001

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

	Intake		Discharge								
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
NICKEL-TOTAL 01067											
POTASSIUM-TOTAL 00937											
SELENIUM-TOTAL 01147											
SILVER-TOTAL 01077											
SODIUM-TOTAL 00929											
THALLIUM-TOTAL 01059											
TIN-TOTAL 01102											
TITANIUM-TOTAL 01152											
ZINC-TOTAL 01092	.073	None	.12	.003	.003	.077	.002	A	D	S	A
OIL AND GREASE 00550											

PART B

(Office use only) 2 S D 0 X W [redacted] 2 0 0 0 8 8 4

Discharge Serial No. 001

B-2. (cont.) **CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)**

	Intake	Discharge									
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION	(4) MAXIMUM POUNDS PER DAY PER PROCESS UNIT	(5) MAXIMUM POUNDS PER DAY	(6) DAILY AVG. CONCENTRATION	(7) AVERAGE POUNDS PER DAY	(8) SAMPLE TYPE	(9) SAMPLE FREQUENCY	(10) METHOD OF ANALYSIS	(11) CONTINUOUS MONITORING
PHENOLS 32730	0.0	None	.040	.009	.009	.040	.009	A	D	S	A
SURFACTANTS 38260											
ALGICIDES* 74051											
CHLORINATED HYDRO-CARBONS* (EXCEPT PESTICIDES) 74052											
PESTICIDES* 74053											

*Name specific compound(s) and fill in the required data for each. Use extra blanks at the end of the form and the "Remarks" space as necessary.

PART B

(Office use only)

2 S D 0 X W 2 0 0 6 8 3 4

Discharge Serial No. 001

B-3. RADIOACTIVE PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-3)

	Intake	Discharge						
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) AVERAGE (DAILY)	(4) MINIMUM (OPERATING YEAR)	(5) MAXIMUM (OPERATING YEAR)	(6) SAMPLE FREQUENCY	(7) CONTINUOUS MONITORING
ALPHA-TOTAL 01501				X			
ALPHA COUNTING ERROR 01502				X			
BETA-TOTAL 03501				X			
BETA COUNTING ERROR 03502				X			
GAMMA-TOTAL 05501				X			
GAMMA COUNTING ERROR 05502				X			
TRITIUM-TOTAL 07000				X			
TRITIUM COUNTING ERROR 07001				X			

B-4. REMARKS

George

J.J. Combes/Grace N.Y.

J.F. Murphy, Jr.

3 December 1971

E.P.A. Voluntary Survey to Establish a National Industrial Wastewater Discharge Inventory - Adams Plant - Adams, Massachusetts

Following your instructions of November 19th the forms sent to us by the Commonwealth of Massachusetts, Water Resources Commission have been filled out and forwarded to them.

Enclosed is a copy of our letter to them used to transmit the information.

J.F. Murphy, Jr.

JFM/bjt
Enc.

OMB No. 158-R0010 Approval Expires 30 Sep 74

ENVIRONMENTAL PROTECTION AGENCY

Office of Water Programs

Report of Industrial Wastewater Discharges

NOTICE

Please read carefully the instructions and notes below before attempting to complete this report.

a. If your facility has filed or will be filing an application with the U.S. Army Corps of Engineers for a permit to discharge into navigable waters, completion of this form should be governed by the following:

1. Where there is no discharge other than to navigable waters and there are no personnel or facilities for treatment of wastewater prior to discharge: complete Items 1 through 5, 8 and 9 of Section I and return the report with a statement to that effect.
2. Where there is no discharge other than to navigable waters but wastewater treatment is provided before discharge: complete Items 1 through 5, 8 and 9 of Section I and a full Section III.
3. Where there are discharges other than to navigable waters, e.g. to municipal facilities, surface containments, etc.: complete Items 1 through 5, 8 and 9 of Section I, a Section II for each discharge other than those to navigable waters and a full Section III where treatment of wastewater before discharge is involved.

b. If your facility is not required to obtain a Corps of Engineers discharge permit, complete Section I, disregarding Items 6, 7, 10 and 11. Complete a Section II for each discharge and a Section III where treatment of wastewater before discharge is involved.

c. All information contained in this report will, upon request, be made available to the public for inspection and copying. Confidential treatment may be extended to specific information which the reporting company considers to constitute trade secrets or commercial or financial information of a confidential nature. Such information must be reported on a separate sheet entitled "Confidential Answers" and must clearly indicate the item to which it applies. Confidentiality will be extended if the reporting company can clearly demonstrate to the satisfaction of the Administrator of the Environmental Protection Agency or his authorized representative that the disclosure of such information to the general public would divulge methods or processes entitled to protection as trade secrets or would reveal commercial or financial information of a confidential nature. In no event will identification of the contents and frequency of a discharge be recognized as confidential or privileged information.

d. Submission of information requested on this form is voluntary.

e. Indicate type of report by circling either a.1., a.2., a.3., or b. above.

SECTION I. GENERAL INFORMATION

1. State (standard abbreviation) | U.S. Army Corps of Engineers Application No. | Code No. (to be assigned by EPA)

MA _____ | 2 S D 0 X W 2 000884 (Div. / Dist. / Type / Seq. No.) | _____

2. Name of reporting company, agency or other organization

W.R. Grace & Co.

3. Mailing address of reporting company, agency or other organization

W.R. Grace & Co.
3 Hanover Square
New York, N.Y. 10004

4. Name, telephone number, title and mailing address of authorized agent for coordination and correspondence regarding this report

W.R. Grace & Co. Polyfibron Div. — (617) 272-4060
Name: J.F. Murphy, Jr. — Telephone Number
Title: Director of Engineering & Purchasing
Mailing Address: North Ave., Northwest Industrial Park
Burlington, Mass. 01803

Signature and title of principal officer responsible for completing and forwarding this report

Signature _____ Title _____

5. Date 12 (mo) 2 (day) 72 (yr)

(Office use only)

6. Check Type of Submittal a. Original ☐ b. Revision ☐

7. Number of Original Submittal

8. Name of plant where discharge will occur

Adams Plant, W.R. Grace & Co.

9. Full mailing address of plant named in item 8 above

Harmony Street
Adams, Mass.

10. Names and mailing addresses of all adjoining property owners whose property is also adjoins the waterway

11. Check to indicate the nature of the proposed activity

a. Discharge ☐ b. Construction ☐ c. Construction with discharge ☐ d. Discharge only ☐

12. If activity is temporary in nature, estimate its duration in months

Discharge Serial #001

13. List intake sources Corps of Engineers Permit has been submitted.

Source	Estimated Volume in Million Gallons Per day or Fraction Thereof
Municipal or private water supply system	___ ___ ___ ___ . ___ ___
Surface water body	___ ___ ___ ___ . ___ ___
Ground water	___ ___ ___ ___ . ___ ___
Other	___ ___ ___ ___ . ___ ___

14. Describe water usage within the plant

Type	Estimated Volume in Million Gallons Per day or Fraction Thereof
Cooling water	___ ___ ___ ___ . ___ ___
Boiler feed water	___ ___ ___ ___ . ___ ___
Process water	___ ___ ___ ___ . ___ ___
Sanitary system*	___ ___ ___ ___ . ___ ___
Other	___ ___ ___ ___ . ___ ___

15. List volume of discharges or losses other than into navigable waters

Type	Estimated Volume in Million Gallons Per day or Fraction Thereof
Municipal waste treatment system	___ ___ ___ ___ . ___ ___
Surface containment	___ ___ ___ ___ . ___ ___
Underground disposal	___ ___ ___ ___ . ___ ___
Waste acceptance firms	___ ___ ___ ___ . ___ ___
Evaporation	___ ___ ___ ___ . ___ ___
Consumption	___ ___ ___ ___ . ___ ___

* Indicate number employees served per day _____

OMB No. 158-R0010 Approval Expires 30 Sep 74

SECTION II. PLANT PROCESS AND DISCHARGE DESCRIPTION

1. Discharge described below is a. Present [X] b. Proposed new or changed [ ]	2. Implementation schedule [ ]	(Office use only)

Name of corporate boundaries within which the point of discharge is located

3. State	4. County	5. City or Town	6. Discharge Serial No.
MA	Berkshire	Adams	001

State the precise location of the point of discharge	9. Name of waterway or other point of discharge
7. Latitude 42 Degrees; 37 Min; 18 Sec. N 8. Longitude 73 Degrees; 07 Min; 18 Sec. W	Flood Control Channel Hoosic River

10. Has application for water quality certification or description of impact been made? If so, give date:

Date (mo / day / yr)	Check if certificate is attached to form	Name Issuing Agency
6 / 25 / 71	[ ]	Mass. Dept. of Public Health Div. of Environmental Health Boston, Mass.

11. Narrative description of activity (include terms of general 4-digit Standard Industrial Classification, and specific manufacturing process)

Fabricating Rubber Products

Coating Materials with Polymeric compounds

12. Standard Industrial Classification Code number	13. Principal products	14. Amount of principal products produced per day
493	Cooling Water From Kathebar Humidity Control Apparatus	~~115,280 Gallons~~ ~~Cooling Water~~

15. Principal raw materials	16. Amount of principal raw materials consumed per day	17. Number of batch discharges per day
-	-	-

18. Average gallons per batch discharge	19. Date discharge began (mo / day / yr)	20. Date discharge will begin (mo / day / yr)
-	7 / 1 / 46	/ /

21. Describe waste abatement practices

The Waste Water is clean Municipal Water that is used to cool two Humidity Control Apparatus. and one cooling roll. This water is then discharged to the storm sewer that discharges into the Hoosic River Flood Abatement Channel.

The Municipal Sewer was connected to the Plant in 1962 approved by the State Public Health, all toilets discharge into the Municipal sewer.

ESEPAR

22. PHYSICAL DESCRIPTION OF INTAKE WATER AND DISCHARGE

Discharge Serial No.	(Office use only)
001	

Parameter and Code	Intake: Untreated Intake Water (1)	Intake: Treated Intake Water (2)	Discharge: Average (Daily) (3)	Discharge: Minimum (Operating Year) (4)	Discharge: Maximum (Operating Year) (5)	Sample Frequency (6)	Continuous Monitoring (7)
Flow (Gallons per day) 00056	.09	None	.086	.06	.10	OTHR	ABS
pH 00400	7	None	7	7	7	OTHR	ABS
Temperature (Winter) (°F) 74028	40	None	70 EST	70 EST	70 EST	OTHR	ABS
Temperature (Summer) (°F) 74027	60	None	82	80 EST	80 EST	OTHR	ABS

23. DISCHARGE CONTENTS

PARAMETER	PRESENT	ABSENT	PARAMETER	PRESENT	ABSENT	PARAMETER	PRESENT	ABSENT
Color 00080		X	Aluminum 01105		X	Nickel 01067		X
Turbidity 00070		X	Antimony 01097		X	Selenium 01147		X
Radioactivity 74050		X	Arsenic 01002		X	Silver 01077		X
Hardness 00900		X	Beryllium 01012		X	Potassium 00937		X
Solids 00500		X	Barium 01007		X	Sodium 00929		X
Ammonia 00610		X	Boron 01022		X	Titanium 01152		X
Organic Nitrogen 00605		X	Cadmium 01027		X	Tin 01102		X
Nitrate 00620		X	Calcium 00916		X	Zinc 01092		X
Nitrite 00615		X	Cobalt 01037		X	Algicides 74051		X
Phosphorus 00665		X	Chromium 01034		X	Oil and Grease 00550		X
Sulfate 00945		X	Copper 01042		X	Phenols 32730		X
Sulfide 00745		X	Iron 01045		X	Surfactants 38260		X
Sulfite 00740		X	Lead 01051		X	Chlorinated Hydrocarbons 74052		X
Bromide 71870		X	Magnesium 00927		X	Pesticides 74053		X
Chloride 00940		X	Manganese 01055		X	Fecal Streptococci Bacteria 74054		X
Cyanide 00720		X	Mercury 71900		X	Coliform Bacteria 74056		X
Fluoride 00951		X	Molybdenum 01062		X			

24a. Have all known hazardous or potentially hazardous substances in your plant been inventoried?

[X] Yes [ ] No

24b. If yes, have steps been taken to insure that there exists no possibility of any such known hazardous or potentially hazardous substance entering this discharge?

[X] Yes [ ] No

25. Remarks

Samples were taken during September to provide information for the Part B of the Permit Application as covered by the Refuse Act 1899. No regular analysis considered necessary because the discharge is municipal water use to cool only.

The information above completes the basic reporting which is requested of all plants. Those plants whose discharge results from an activity included within any of the Standard Industrial Classification Code (SIC Code) categories listed below are also requested to complete Parts A and B of this Section.

CRITICAL INDUSTRIAL GROUPS

SIC	098	FISH HATCHERIES, FARMS, AND PRESERVES
SIC	10-14	DIVISION B – MINING
SIC	201	MEAT PRODUCTS
SIC	202	DAIRY PRODUCTS
SIC	203	CANNED PRESERVED FRUITS, VEGETABLES (EXCEPT SEAFOODS, SIC 2031 AND 2036)
SIC	2031, 2036	CANNED AND CURED FISH AND SEAFOODS; FRESH OR FROZEN PACKAGED FISH AND SEAFOODS
SIC	204	GRAIN MILL PRODUCTS
SIC	206	SUGAR
SIC	207	CONFECTIONARY AND RELATED PRODUCTS
SIC	208	BEVERAGES
SIC	209	MISCELLANEOUS FOOD PREPARATIONS AND KINDRED PRODUCTS
SIC	22	TEXTILE MILL PRODUCTS
SIC	23	APPAREL AND OTHER FINISHED PRODUCTS MADE FROM FABRICS AND SIMILAR MATERIALS
SIC	242	SAWMILLS AND PLANING MILLS
SIC	2432	VENEER AND PLYWOOD
SIC	2491	WOOD PRESERVING
SIC	26	PAPER AND ALLIED PRODUCTS
SIC	281	INDUSTRIAL INORGANIC AND ORGANIC CHEMICALS (EXCEPT SIC 2818)
SIC	2818	INDUSTRIAL ORGANIC CHEMICALS
SIC	282	PLASTIC MATERIALS AND SYNTHETIC RESINS, SYNTHETIC RUBBER, SYNTHETIC AND OTHER MAN-MADE FIBERS, EXCEPT GLASS
SIC	283	DRUGS
SIC	284	SOAP, DETERGENTS, AND CLEANING PREPARATIONS, PERFUMES, COSMETICS, AND OTHER TOILET PREPARATIONS
SIC	285	PAINTS, VARNISHES, LACQUERS, ENAMELS, AND ALLIED PRODUCTS
SIC	2871	FERTILIZERS
SIC	2879	AGRICULTURAL PESTICIDES, AND OTHER AGRICULTURAL CHEMICALS, NOT ELSEWHERE CLASSIFIED
SIC	2891	ADHESIVES AND GELATIN
SIC	2892	EXPLOSIVES
SIC	29	PETROLEUM REFINING AND RELATED INDUSTRIES
SIC	3011, 3069	TIRES AND INNER TUBES; FABRICATED RUBBER PRODUCTS, NOT ELSEWHERE CLASSIFIED
SIC	3079	MISCELLANEOUS PLASTIC PRODUCTS
SIC	311	LEATHER TANNING AND FINISHING
SIC	32	STONE, CLAY, GLASS, AND CONCRETE PRODUCTS
SIC	331	BLAST FURNACES, STEEL WORKS, AND ROLLING AND FINISHING MILLS
SIC	332	IRON AND STEEL FOUNDRIES
SIC	333, 334	PRIMARY SMELTING AND REFINING OF NONFERROUS METALS; SECONDARY SMELTING AND REFINING OF NONFERROUS METALS
SIC	336	NONFERROUS FOUNDRIES
SIC	347	COATING, ENGRAVING, AND ALLIED SERVICES
SIC	35	MACHINERY, EXCEPT ELECTRICAL
SIC	36	ELECTRICAL MACHINERY, EQUIPMENT, AND SUPPLIES
SIC	37	TRANSPORTATION EQUIPMENT (EXCEPT SHIP BUILDING AND REPAIRING, SIC 3731)
SIC	3731	SHIP BUILDING AND REPAIRING
SIC	491	ELECTRIC COMPANIES AND SYSTEMS
SIC	(493)	COMBINATION COMPANIES AND SYSTEMS

PART A

(Note: Submission of Part A is requested of all activities whose processes are listed on page 3 above.)

(Office use only)

Discharge Serial No. 001

INFORMATION REQUESTED OF SPECIFIED INDUSTRIES

PARAMETER AND CODE	Intake: (1) DAILY AVG. CONCENTRATION UNTREATED INTAKE WATER	Intake: (2) DAILY AVG. CONCENTRATION TREATED INTAKE WATER	Discharge: (3) MAXIMUM CONCENTRATION PER PROCESS UNIT	Discharge: (4) MAXIMUM POUNDS PER DAY PER DAY	Discharge: (5) DAILY AVG. CONCENTRATION	Discharge: (6) AVERAGE POUNDS PER DAY	Discharge: (7) SAMPLE TYPE	Discharge: (8) SAMPLE FREQUENCY	Discharge: (9) METHOD OF ANALYSIS	Discharge: (10) CONTINUOUS MONITORING	Discharge: (11)
ALKALINITY (as $CaCO_3$) 00410	NOT KNOWN	NOT KNOWN	NOT KNOWN	NOT KNOWN	NOT KNOWN	NOT KNOWN	NOT KNOWN	NOT KNOWN	NONE	NONE	NONE
B.O.D. 5-DAY 00310	"	"	"	"	"	"	"	"	"	"	"
CHEMICAL OXYGEN DEMAND (C.O.D.) 00340	"	"	"	"	"	"	"	"	"	"	"
TOTAL SOLIDS 00500	"	"	"	"	"	"	"	"	"	"	"
TOTAL DISSOLVED SOLIDS 70300	"	"	"	"	"	"	"	"	"	"	"
TOTAL SUSPENDED SOLIDS 00530	"	"	"	"	"	"	"	"	"	"	"
TOTAL VOLATILE SOLIDS 00505	"	"	"	"	"	"	"	"	"	"	"
AMMONIA (as N) 00610	"	"	"	"	"	"	"	"	"	"	"
KJELDAHL NITROGEN 00625	"	"	"	"	"	"	"	"	"	"	"
NITRATE (as N) 00620	"	"	"	"	"	"	"	"	"	"	"
PHOSPHORUS TOTAL (as P) 00665	"	"	"	"	"	"	"	"	"	"	"

TABLE A
Guide for Completion of Part A

PARAMETER & UNIT	METHOD	REFERENCES			SIGNIFICANCE IN REPORTING DATA
		STANDARD METHODS 13TH ED. 1971	A.S.T.M. STANDARDS Pt. 23 1970	W.Q.O. METHODS 1971	
ALKALINITY AS $Ca\ CO_3$ Mg/liter	ELECTROMETRIC TITRATION TECHNICON METHYL ORANGE METHOD	p. 370	p. 154	p. 6	X.
B.O.D. 5-DAY Mg/liter	MODIFIED WINKLER METHOD OR PROBE METHOD	p. 489	p. 712	p. 15	X.
CHEMICAL OXYGEN DEMAND (C.O.D.) Mg/liter	DICHROMATE REFLUX METHOD	p. 495	–	p. 17	X.
TOTAL SOLIDS Mg/liter	GRAVIMETRIC, 105°C. METHOD	p. 535	–	p. 280	X.
TOTAL DISSOLVED (FILTERABLE) SOLIDS Mg/liter	GLASS FIBER FILTRATION METHOD, 180°C.	p. 539	–	p. 275	X.
TOTAL SUSPENDED (NON-FILTERABLE) SOLIDS Mg/liter	GLASS FIBER FILTRATION METHOD, 103–105°C.	p. 537	–	p. 278	X.
TOTAL VOLATILE SOLIDS Mg/liter	GRAVIMETRIC METHOD 550°C.	p. 536	–	p. 282	X.
AMMONIA (as N) Mg/liter	DISTILLATION-NESSLERIZATION METHOD OR TECHNICON-DIGESTION & PHENOLATE METHOD	p. 453	–	p. 134	.XX
KJELDAHL NITROGEN Mg/liter	DIGESTION-DISTILLATION METHOD OR TECHNICON-DIGESTION & PHENOLATE METHOD	p. 469	–	p. 149	.XX
NITRATE (as N) Mg/liter	BRUCINE SULFATE METHOD OR TECHNICON-HYDRAZINE REDUCTION METHOD	p. 461	–	p. 170	.XX
TOTAL PHOSPHORUS (as P) Mg/liter	PERSULFATE DIGESTION & SINGLE REAGENT METHOD OR TECHNICON-MANUAL DIGESTION & SINGLE REAGENT OR STANNOUS CHLORIDE	p. 526	–	p. 235	.XX

PART B DISCHARGE DESCRIPTION

(Note: Submission of Part B is requested of all activities who have completed Part A. Only those parameters specifically indicated in the instructions are to be reported by a particular industry)

(Office use only)

Discharge Serial No. 001

B-1. PHYSICAL AND BIOLOGICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-1)

	Intake	Discharge					
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) AVERAGE (DAILY)	(4) MINIMUM (OPERATING YEAR)	(5) MAXIMUM (OPERATING YEAR)	(6) SAMPLE FREQUENCY	(7) CONTINUOUS MONITORING
COLOR 00080	0	None	3.3	X	10	D	A
SPECIFIC CONDUCTANCE 00095							
TURBIDITY 00070	0	None	.9	X	5	D	A
FECAL STREPTOCOCCI BACTERIA 74054	0	None	0	X	0	D	A
FECAL COLIFORM BACTERIA 74055	0	None	0	X	0	D	A
TOTAL COLIFORM BACTERIA 74056	8.7	None	0	X	0	D	A

PART B

(Office use only)

Discharge Serial No.

B-2. CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

	Intake		Discharge								
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
ACIDITY (as $CaCO_3$) 00435											
TOTAL ORGANIC CARBON (T.O.C.) 00680											
TOTAL HARDNESS 00900											
NITRITE (as N) 00615											
ORGANIC NITROGEN 00605											
PHOSPHORUS-ORTHO (as P) 70507											
SULFATE 00945	14	None	18.0	15.0	15.0	16.67	12.26	A	D	S	A
SULFIDE 00745											
SULFITE 00740											
BROMIDE 71870											

PART B

(Office use only)

Discharge Serial No.
001

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

	Intake		Discharge									
PARAMETER AND CODE	UNTREATED INTAKE WATER (1)	TREATED INTAKE WATER (2)	MAXIMUM CONCENTRATION (3)	MAXIMUM POUNDS PER DAY PER PROCESS UNIT (4)	MAXIMUM POUNDS PER DAY (5)	DAILY AVG. CONCENTRATION (6)	AVERAGE POUNDS PER DAY (7)	SAMPLE TYPE (8)	SAMPLE FREQUENCY (9)	METHOD OF ANALYSIS (10)	CONTINUOUS MONITORING (11)
CHLORIDE 00940	2.17	None	3.50	2.88	2.88	2.58	2.16	A	D	S	A
CYANIDE 00720											
FLUORIDE 00951											
ALUMINUM-TOTAL 01105											
ANTIMONY-TOTAL 01097											
ARSENIC-TOTAL 01002											
BARIUM-TOTAL 01007											
BERYLLIUM-TOTAL 01012											
BORON-TOTAL 01022											
CADMIUM-TOTAL 01027											

PART B

(Office use only)

Discharge Serial No. 001

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

	Intake	Discharge									
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION	(4) MAXIMUM POUNDS PER DAY PER PROCESS UNIT	(5) MAXIMUM POUNDS PER DAY	(6) DAILY AVG. CONCENTRATION	(7) AVERAGE POUNDS PER DAY	(8) SAMPLE TYPE	(9) SAMPLE FREQUENCY	(10) METHOD OF ANALYSIS	(11) CONTINUOUS MONITORING
CALCIUM-TOTAL 00916											
CHROMIUM-TOTAL 01034	0	None	0	0	0	0	0	A	D	S	A
COBALT-TOTAL 01037											
COPPER-TOTAL 01042											
IRON-TOTAL 01045											
LEAD-TOTAL 01051											
MAGNESIUM-TOTAL 00927											
MANGANESE-TOTAL 01055											
MERCURY-TOTAL 71900											
MOLYBDENUM-TOTAL 01062											

PART B

(Office use only)

Discharge Serial No. 001

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

	Intake		Discharge								
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION	(4) MAXIMUM POUNDS PER DAY PER PROCESS UNIT	(5) MAXIMUM POUNDS PER DAY	(6) DAILY AVG. CONCENTRATION	(7) AVERAGE POUNDS PER DAY	(8) SAMPLE TYPE	(9) SAMPLE FREQUENCY	(10) METHOD OF ANALYSIS	(11) CONTINUOUS MONITORING
NICKEL-TOTAL 01067											
POTASSIUM-TOTAL 00937											
SELENIUM-TOTAL 01147											
SILVER-TOTAL 01077											
SODIUM-TOTAL 00929											
THALLIUM-TOTAL 01059											
TIN-TOTAL 01102											
TITANIUM-TOTAL 01152											
ZINC-TOTAL 01092	.023	None	.050	.042	.042	.037	.031	A	D	S	A
OIL AND GREASE 00550											

EPA Form 7500-1 (7-71)

PART B

(Office use only)

Discharge Serial No. 001

B-2. (cont.) CHEMICAL PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-2)

	Intake		Discharge								
PARAMETER AND CODE	(1) UNTREATED INTAKE WATER	(2) TREATED INTAKE WATER	(3) MAXIMUM CONCENTRATION	(4) MAXIMUM POUNDS PER DAY PER PROCESS UNIT	(5) MAXIMUM POUNDS PER DAY	(6) DAILY AVG. CONCENTRATION	(7) AVERAGE POUNDS PER DAY	(8) SAMPLE TYPE	(9) SAMPLE FREQUENCY	(10) METHOD OF ANALYSIS	(11) CONTINUOUS MONITORING
PHENOLS 32730	0	None	0.56	0.46	0.46	0.56	.46	A	D	S	A
SURFACTANTS 38260											
ALGICIDES* 74051											
CHLORINATED HYDRO-CARBONS* (EXCEPT PESTICIDES) 74052											
PESTICIDES* 74053											

*Name specific compound(s) and fill in the required data for each. Use extra blanks at the end of the form and the "Remarks" space as necessary.

PART B

(Office use only)

Discharge Serial No. 001

B-3. RADIOACTIVE PARAMETERS OF INTAKE WATER AND DISCHARGE (See Table B-3)

	Intake	Discharge						
PARAMETER AND CODE	UNTREATED INTAKE WATER	TREATED INTAKE WATER	AVERAGE (DAILY)	MINIMUM (OPERATING YEAR)	MAXIMUM (OPERATING YEAR)	SAMPLE FREQUENCY	CONTINUOUS MONITORING	
	(1)	(2)	(3)	(4)	(5)	(6)	(7)	
ALPHA-TOTAL 01501				X				
ALPHA COUNTING ERROR 01502				X				
BETA-TOTAL 03501				X				
BETA COUNTING ERROR 03502				X				
GAMMA-TOTAL 05501				X				
GAMMA COUNTING ERROR 05502				X				
TRITIUM-TOTAL 07000				X				
TRITIUM COUNTING ERROR 07001				X				

B-4. REMARKS

4. For each of the categories below, list the current number of employees (full time/part time) doing water pollution control work and estimate the total number of employees for each of the next five calendar years. (See Instructions)

	Number Full Time Currently Employed (1)	Number Part Time Currently Employed (2)	Total Number Next Year (3)	Total Number Next Year + 1 (4)	Total Number Next Year + 2 (5)	Total Number Next Year + 3 (6)	Total Number Next Year + 4 (7)
Superintendant	None	None	None	None	None	None	None
Engineer/San. Engineer	"	"	"	"	"	"	"
Chemist	"	"	"	"	"	"	"
Biologist	"	"	"	"	"	"	"
Lab. Technician	"	"	"	"	"	"	"
Senior Operator/ Foreman	"	"	"	"	"	"	"
Equipment Operator	"	"	"	"	"	"	"
Instrument Repairman	"	"	"	"	"	"	"
Maintenance Man	"	"	"	"	"	"	"
Attendant	"	"	"	"	"	"	"
Unskilled	"	"	"	"	"	"	"
Clerical	"	"	"	"	"	"	"
Others (Specify)	"	"	"	"	"	"	"
Others (Specify)	"	"	"	"	"	"	"
Others (Specify)	"	"	"	"	"	"	"

5. Remarks

None contemplated - Only clean Water being discharged.

OMB No. 158-R0010 Approval Expires 30 Sep 74

SECTION III. WASTE TREATMENT FACILITIES COST AND MANPOWER INFORMATION

(Office use only)

1. Give approximate expenditures (in thousands of dollars) for existing and future wastewater treatment facilities and/or in-plant control processes. (See instructions)

Original Facility - Type	Year Placed in Operation	Original Cost
Facility Addition 1 - Type	Year Placed in Operation	1st Addition Cost
Facility Addition 2 - Type	Year Placed in Operation	2nd Addition Cost
Facility Addition 3 - Type	Year Placed in Operation	3rd Addition Cost
Facilities to be Constructed this Year	1971 This Year	– This Year's Expenditures
Facilities to be Constructed Next Year - Type	1972 Next Year	– Next Year's Expenditures
Facilities to be Constructed Next Year + 1 - Type	1973 Next Year + 1	– Next Year + 1 Expenditures
Facilities to be Constructed Next Year + 2 - Type	Next Year + 2	Next Year + 2 Expenditures
Facilities to be Constructed Next Year + 3 - Type	Next Year + 3	Next Year + 3 Expenditures
Facilities to be Constructed Next Year + 4 - Type	Next Year + 4	Next Year + 4 Expenditures

2. List expenditures (in thousands of dollars) for the operation and maintenance of your facility. (See instructions for calculation of operation and maintenance expenditures)

	(1)	(2)	(3)	(4)	(5)	(6)	(7)
Year	–	–	–	–	–	–	–
	Past Year	Present Year	Next Year	Next Year + 1	Next Year + 2	Next Year + 3	Next Year + 4
Expenditures	–	–					

3. Remarks

Because this is clean waste water being discharged to storm sewer no expenditure for treatment is contemplated.

COMMONWEALTH OF MASSACHUSETTS
Department of Environmental Quality Engineering

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

For Official Use Only | INSTALLATION'S EPA I.D. NUMBER | DATE ISSUED mo. day year

MAD 002 081 651

Print or type with ELITE type (12 characters/inch) in the boxes. Refer to Line-by-Line Instructions.

I. NAME OF INSTALLATION *(Do not punctuate or use initials)*

W R GRACE & CO

II. INSTALLATION MAILING ADDRESS

Street or Post Office Box

HARMONY STREET

City or Town: ADAMS | State: MA | Zip Code: 01220-

III. LOCATION OF INSTALLATION

Street or Route Number

SAME

City or Town | State | Zip Code: 01220-

IV. PRINCIPAL ACTIVITY

4 digit SIC number: 2641 | Description | 4 digit SIC number | Description

V. INSTALLATION CONTACT

Name *(last, first)*: NAGY, ALEXANDER | Title: ASST MANAG | Phone Number *(area code) (number)*: 413 743 0546

VI. OWNERSHIP

Name of Installation's Legal Owner: W R GRACE & CO

Type of Ownership: FEDERAL ☐ NON-FEDERAL ☒

Name of the Legal Owner of the Property

VII. TYPE OF HAZARDOUS WASTE ACTIVITY *Enter X on the appropriate line.*

Hazardous Waste Activity	Waste Fuel Activity	Waste Fuel Burning Type of Combustion Device
X Large quantity generator	___ Generator marketing to burner	*If a burner, specify:*
___ Small quantity generator	___ Other marketer	___ Utility boiler
___ Transporter *	___ Burner **	___ Industrial boiler
___ Treater/Storer/Disposer *	*If any of above, specify:*	___ Industrial furnace
___ Wastewater Treatment Unit	___ Hazardous waste fuel	
* *A Massachusetts license is required for these activities.*	___ Off-specification used oil fuel	** *A Massachusetts recycling permit is required.*
	___ Specification used oil fuel	

Please continue on the second page of this form.

VIII. DESCRIPTION OF HAZARDOUS WASTES

Enter the four-digit number from the Massachusetts Regulations 310 CMR for each listed hazardous waste which your installation handles. Use additional sheets if necessary.

D codes - Characteristic Non-Listed Hazardous Wastes. See 30.121 through 30.125.

D001					

F and M codes - Hazardous Wastes from Non-Specific Sources. See 30.131.

F005					
M001					

K codes - Hazardous Wastes from Specific Sources. See 30.132.

U codes - Commercial Chemical Product Hazardous Wastes. See 30.133.

P codes - Acutely Hazardous Wastes. See 30.136.

IX. COMMENTS

☐ Sheet Attached

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possiblity of fine and imprisonment.

In addition, I understand that any material supplied with this application will not be considered confidential unless I have specifically requested that such material be kept confidential and and the Department has made a determination of confidentiality in accordance with 310 CMR 3.00, Regulations Governing Access to and Confidentiality of Department Records and Files under the Hazardous Waste Management Act.

SIGNATURE	NAME & OFFICIAL TITLE (type or print)	DATE SIGNED
James F. Murphy by	James F. Murphy, Jr. Asst. Vice President	

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

INSTRUCTIONS: If you received a preprin label, affix it in the space at left. If any of information on the label is incorrect, draw a l through it and supply the correct informat in the appropriate section below. If the labe complete and correct, leave Items I, II, and below blank. If you did not receive a preprin label, complete all items. "Installation" mean single site where hazardous waste is generat treated, stored and/or disposed of, or a tra porter's principal place of business. Please re to the INSTRUCTIONS FOR FILING NOTII CATION before completing this form. T information requested herein is required by l *(Section 3010 of the Resource Conservation a Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS

C

INSTALLATION'S EPA I.D. NUMBER | APPROVED | DATE RECEIVED (yr., mo., & day)

F | T/A | C | 1

I. NAME OF INSTALLATION

W. R. GRACE & CO., POLYFIBRON DIVISION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3 HARMONY STREET

CITY OR TOWN	ST.	ZIP CODE
4 ADAMS	MA	01220

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5 HARMONY STREET

CITY OR TOWN	ST.	ZIP CODE
6 ADAMS	MA	01220

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)	PHONE NO. (area code & no.)
2 ALLAN T. MICHAUD, PLANT MANAGER	413-743-0546

V. OWNERSHIP

DETACH

A. NAME OF INSTALLATION'S LEGAL OWNER

8 W. R. GRACE & CO.

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: MAD020816511

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S W T

T/A C 1

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F005	M001				
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001)	[ ] 2. CORROSIVE (D002)	[ ] 3. REACTIVE (D003)	[ ] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
James F. Murphy Jr.	James F. Murphy, Jr. Assistant Vice President	12/14/83

DETACH

GRACE

Polyfibron Division

W.R. Grace & Co.
55 Hayden Avenue
Lexington, Mass. 02173

(617) 861-6600

cc: J. F. Murphy

bcc: D. R. Beckerman
T. O. Gavin
N. I. Palmer
M. Stoler - Cambridge
R. G. Tower - Adams

December 14, 1983

Ms. Mary C. Sanderson
State Waste Programs Branch
U.S. Environmental Protection Agency
J.F.K. Federal Building (Room 1903)
Boston, Massachusetts 02203

Dear Mary:

RE: MAD 002081615

The W. R. Grace & Co. facility in Adams, Massachusetts has been operating as a hazardous waste storage facility with interim status, having met the requirements of 40 CFR §270.70. Grace has recently reevaluated its need to maintain its interim status. Based on this evaluation, Grace has decided to voluntarily withdraw its Part A application and terminate its interim status. Enclosed is a subsequent notification form reflecting this change.

Grace had originally submitted its Part A application because we were uncertain that regular hazardous waste pick-ups could be arranged on a reliable basis, particularly during the winter months. Since the regulations became effective three years ago, Grace has determined that our concerns were no longer warranted. On this basis, Grace will continue to be a generator of hazardous waste and will comply with all Massachusetts generator regulations as specified in 310 CMR 30.300.

On December 16, 1983, all remaining hazardous waste that was being stored on-site was shipped off-site for disposal by Recycling Industries, Inc. All hazardous waste generated by the plant after the above date will be subject to the 90-day accumulation regulations as specified in 310 CMR 30.340. If you have any questions concerning our change of hazardous waste activity, please contact me at the above number.

Sincerely,

Gary W. Siegel
Environmental Engineer

GWS/mlr

cc: Linda Benevides - DEQE, Boston
A. T. Michaud - Grace, Adams
Joan Thomas - DEQE, Springfield

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S79016
GSA No. 0246-EPA-OT

U.S. ENVIRONMENTAL PROTECTION AGENCY

EPA NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.	
I. NAME OF INSTALLATION	
II. INSTALLATION MAILING ADDRESS	PLEASE PLACE LABEL IN THIS SPACE
III. LOCATION OF INSTALLATION	

INSTRUCTIONS: If you received a preprint label, affix it in the space at left. If any of t information on the label is incorrect, draw a li through it and supply the correct informati in the appropriate section below. If the label complete and correct, leave Items I, II, and below blank. If you did not receive a preprint label, complete all items. "Installation" means single site where hazardous waste is generate treated, stored and/or disposed of, or a trar porter's principal place of business. Please ref to the INSTRUCTIONS FOR FILING NOTIF CATION before completing this form. TI information requested herein is required by la *(Section 3010 of the Resource Conservation a Recovery Act).*

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F | T/A: | C: 1 | APPROVED | DATE RECEIVED (yr., mo., & day)

I. NAME OF INSTALLATION

W. R. GRACE & CO., POLYFIBRON DIVISION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3 HARMONY STREET

CITY OR TOWN: 4 ADAMS | ST.: MA | ZIP CODE: 01220

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 HARMONY STREET

CITY OR TOWN: 6 ADAMS | ST.: MA | ZIP CODE: 01220

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 ALLAN T MICHAUD, PLANT MANAGER | PHONE NO. *(area code & no.)*: 413-743-0546

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 W R GRACE & CO

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [ ] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify):*

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [ ] A. FIRST NOTIFICATION
- [X] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: MAD002081651

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

TRANSMITTAL STATEMENT

to be mailed with the Annual Report

W.R. GRACE & Co. — Name of Installation

MAD002081651 — EPA Identification No.

Please check the appropriate response(s):

1. ✓ We are submitting the Annual Report as required.

2. _____ We are submitting Part 1 of the Annual Report but do not feel we are required to complete Parts 2 or 3 for the following reasons:

   _____ We did not manifest any hazardous waste (in quantities described in Who Must File) but will retain our status as a Large Quantity Generator for possible future use, or

   _____ We did not manifest hazardous waste in the quantities described in Who Must File and would like to change our status to Small Quantity Generator,* or

   _____ We did not manifest any hazardous waste, or did not generate as much as 20 kilograms of non-acutely hazardous waste in any one month, at this address and request that our EPA ID Number be withdrawn.*

   _____ We moved our operation during 1985 and are now located at:

   _____

   _____

   New EPA Identification Number: _____

   _____ We generate only waste oil.

* Companies requesting a change of status will be sent a Certification Statement to be completed. The change of status will be confirmed by DEQE in writing. Companies contemplating a move during 1986 should apply for a new EPA Identification Number and complete a Certification Statement to withdraw their existing ID prior to the move.

ANNUAL HAZARDOUS WASTE REPORT

PART 1

Part 1 of the Annual Report is to be completed by all respondents.

1. Current Status of Installation: (check where applicable) (X Generator

( ) Treatment, Storage, Disposal Facility ( ) Wastewater Treatment Unit ( ) Recycling Permittee

2. Reporting Year: Year ending 1985

3. EPA Identification Number: MAD000208165 1

ATTACH MAILING LABEL IF INCORRECT

4. Installation's Name: W.R. GRACE & CO.

5. Installation's Address: HARMONY ST.
ADAMS, MA 01220

6. Installation Contact: Alexander W. Nagy Tel. No.: 413 743 0546

7. Does your installation discharge process wastewater? X Yes ___ No
If yes: (a) NPDES Permit Number MA0250007 or
(b) Groundwater discharge permit _____ or
(c) Name of municipal sewerage system TOWN OF ADAMS

Is the wastewater considered hazardous prior to processing?
___ Yes X No (If yes, complete Part 3, line 16.)

8. Is your installation registered with the Division of Air Quality Control?
X Yes ___ No (For verification, contact your DEQE Regional office.)

9. Transportation Services Used: (list name and EPA ID number of each)
CLEAN HARBORS (MA) INC. MAD053452637

10. Certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

In addition, I understand that any material supplied with this application will not be considered confidential unless I have specifically requested that such material be kept confidential and the Department has made a determination of confidentiality in accordance with 310 CMR 3.00, Regulations Governing Access to and Confidentiality of Department Records and Files under the Hazardous Waste Management Act.

Allan T. Michaud
Authorized Signature of Owner, Operator or Designated Official

2/10/86
Date Signed

ALLAN T. MICHAUD
Print or Type Name

PLANT MANAGER
Title of Person Signing

Generator's EPA Identification Number: MAD002081651

13. Comments (refer to line number): Use this space to explain any entry in (12).

14. Waste Reduction and On-Site Recovery by Generator (required for recycling permittees):

Manifests from large quantity generators must contain a certification that the volume and/or quantity and toxicity of the waste have been reduced to the maximum degree economically practicable and the method used to manage the waste minimizes risk to the extent practicable.

A. Type of activity: (Check where appropriate)

1) Treatment as an integral part of the manufacturing process (as defined in Mass. regulations, 310 CMR 30.010) _____

2) Recycling by permit (as defined in 310 CMR 30.143) _____

3) Oil and water separation (as defined in 310 CMR 30.202:10) _____

4) Other (please specify, for example, substitution, process modification, sludge reduction, etc.)

_____

_____

_____

B. Amount: (estimated annual quantity)

1) Total waste entered for processing: _____ gallons

2) Total amount of product: _____ gallons

C. Description of waste and process:

If you have more than one recovered or reduced material, duplicate this page for each.

PART 2

GENERATOR ANNUAL REPORT

To complete this part of the report, refer to all your manifests for the calendar year. Separate your manifests by receiving facility.

11. Generator's EPA Identification Number: MADØØ2Ø8165 1

12. Waste Shipped Off-Site: (Complete a separate page for each facility to which waste was shipped. Reproduce additional pages as necessary.)

a) Name of Receiving Facility: CLEAN HARBORS (MA) INC.

b) Facility EPA ID Number: MADØ534526 37

c) Facility Address: 385 Quincy AVE, BRAINTREE MA
(Street or P.O. Box) (City) (State)

(If the waste was exported to a foreign country, enter Waste Exported on line b. and identify the U.S. border point of departure in Comments, line 13.)

Line Number	A Description of Waste	B EPA Waste Number	C Quantity of Waste	D Unit Code (G,P,T,Y)	E Receiving Facility Handling Code
1	WASTE FLAMMABLE LIQUID NOS	DØØ1	144,400	P	SØ1, TØ6
2	WASTE FUEL OIL #6 NOS	DØØ1	400	P	SØ1

Instructions:

A. To identify your wastes, refer to your manifests. The description will usually be the U.S. DOT shipping name. Use a separate line for each type of waste. Number lines consecutively. Duplicate page as necessary.

B. The EPA Waste Number (Block I. on the Uniform Manifest Form) can also be found in Massachusetts regulations, 310 CMR 30.120-30.136. The number will be a 4-digit code, beginning with a letter, followed by 3 numbers.

C. Enter the total amount of this particular waste which was shipped to this facility during the calendar year.

D. The unit codes are: G - gallons; P - pounds; T - tons; Y - cubic yards. If you shipped waste in 55 gal. drums, multiply number of drums by 55, enter it.

E. Receiving facility handling codes are found in Block K on the Uniform Manifest. This code will be a letter (S, T, or D), followed by 2 numbers.

MAR 4 1985 GWS 1984 G

TRANSMITTAL STATEMENT

to be mailed with the Annual Report

W.R.GRACE & CO. MAD002081651

Name of Installation EPA Identification No.

Please check the appropriate response(s):

1. ✓ We are submitting the Annual Report as required.

2. ____ We are submitting Part 1 of the Annual Report but do not feel we are required to complete Parts 2 or 3 for the following reasons:

____ We did not manifest any hazardous waste (in quantities described in Who Must File) but will retain our status as a Generator for possible future use.

____ We did not manifest hazardous waste in the quantities described in Who Must File and would like to change our status to Small Quantity Generator.*

____ We did not manifest any hazardous waste, or did not generate as much as 20 kilograms of non-acutely hazardous waste in any one month, at this address and request that our EPA ID Number be withdrawn.*

____ We moved our operation during 1984 and are now located at:

_____

_____

New EPA Identification Number: _____

____ We generate only waste oil.

* Companies requesting a change of status will be sent a Certification Statement to be completed. The change of status will be confirmed by DEQE in writing. Companies contemplating a move during 1985 should apply for a new EPA Identification Number and Certification Statement to withdraw their existing ID prior to the move.

PUBLICATION #13874-7-2500-12-84-C.R.
APPROVED BY: Daniel Carter, Purchasing Agent

ANNUAL HAZARDOUS WASTE REPORT

PART 1

Part 1 of the Annual Report is to be completed by all respondents.

1. Current Status of Installation: check where applicable

(X) Generator ( ) Treatment, Storage, Disposal Facility ( ) Wastewater Treatment Unit

2. Reporting Year: Year ending 19 84

3. EPA Identification Number: MAD002081651

4. Installation's Name: W. R. GRACE & CO.

5. Installation's Address: HARMONY ST.
ADAMS, MA. 01220

6. Installation Contact: RUSSELL G. TOWER Tel. No.: 413-743-4365

7. Does your installation discharge process wastewater? X Yes ___ No

If yes: (a) NPDES Permit Number MAG250010

(b) Municipal sewerage system TOWN OF ADAMS

Is the wastewater considered hazardous prior to processing?

___ Yes X No (If yes, complete Part 3, line 16.)

ATTACH MAILING LABEL IF INCORRECT

8. Is your installation registered with the Division of Air Quality Control?

X Yes ___ No (For verification, contact your DEQE Regional office.)

9. Transportation Services Used: (List name and EPA ID Number of each.)

INLAND POLLUTION CONTROL INC. MAD095869459

SCA CHEMICAL SERVICES, MA, INC. MAD053452637

10. Certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

In addition, I understand that any material supplied with this application will not be considered confidential unless I have specifically requested that such material be kept confidential and the Department has made a determination of confidentiality in accordance with 310 CMR 3.00, Regulations Governing Access to and Confidentiality of Department Records and Files under the Hazardous Waste Management Act.

Allan F. Michaud
Authorized Signature of Owner/Operator or Designated Official

2/28/85
Date Signed

ALLAN F MICHAUD
Print or Type Name

PLANT MANAGER
Title of Person Signing

PART 2

GENERATOR ANNUAL REPORT

To complete this part of the report, refer to all your manifests for the calendar year. Separate your manifests by receiving facility.

11. Generator's EPA Identification Number: MAD002081651

12. Waste Shipped Off-Site: (Complete a separate page for each facility to which waste was shipped. Reproduce additional pages as necessary.)

a) Name of Receiving Facility: SCA CHEMICAL SERVICES, MA, INC

b) Facility EPA ID Number: MAD053452637

c) Facility Address: 395 QUINCY AVE, BRAINTREE, MA.
(Street or P.O. Box) (City) (State)

(If the waste was exported to a foreign country, enter Waste Exported on line b. and identify the U.S. border point of departure in Comments, line 13.)

Line Number	A Description of Waste	B EPA Waste Number	C Quantity of Waste	D Unit Code (G,P,T,Y)	E Receiving Facility Handling Code
1	WASTE FLAMMABLE LIQUID N.O.S.	D001	124,600	P	S01, T06
2	WASTE CEMENT LIQUID N.O.S.	D001	800	P	S01

Instructions:

A. To identify your wastes, refer to your manifests. The description will usually be the U.S. DOT shipping name. Use a separate line for each type of waste. Number lines consecutively. Duplicate page as necessary.

B. The EPA Waste Number (Block I. on the Uniform Manifest Form) can also be found in Massachusetts regulations, 310 CMR 30.120-30.136. The number will be a 4-digit code, beginning with a letter, followed by 3 numbers.

C. Enter the total amount of this particular waste which was shipped to this facility during the calendar year.

D. The unit codes are: G - gallons; P - pounds; T - tons; Y - cubic yards. If you shipped waste in 55 gal. drums, multiply number of drums by 55, enter G.

E. Receiving facility handling codes are found in Block K on the Uniform Manifest. This code will be a letter (S, T, or D), followed by 2 numbers.

Generator's EPA Identification Number: MAD002081651

13. Comments (refer to line number): Use this space to explain any entry in (12).

14. Waste Reduction and On-Site Recovery by Generator (optional question):

After September 1, 1985, manifests must contain a generator certification that the volume and/or quantity and toxicity of the waste has been reduced to the maximum degree economically practicable and the method used to manage the waste minimizes risk to the extent practicable.

A. Type of activity: (Check where appropriate)

1) Treatment as an integral part of the manufacturing process (as defined in Mass. regulations, 310 CMR 30.010) _____

2) Re-use (see 310 CMR 30.355) and/or recycling by approval of the Department (see CMR 30.380) _____

3) Oil and water separation (see 310 CMR 30.202:10) _____

4) Combustion of waste as a fuel (see 310 CMR 30.356) _____

B. Amount: (estimated annual quantity)

1) Total waste entered for processing: _____ gallons

2) Total amount of recovered product: _____ gallons

C. Description of waste and process:

If you have more than one recovered or reduced material, duplicate this page for each.

MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL QUALITY ENGINEERING

GENERAL INSTRUCTIONS

ANNUAL HAZARDOUS WASTE REPORT

WHO MUST FILE

- Large Quantity Generators, defined as those

  who generate in a month more than
  - 1,000 kilograms of non-acutely hazardous waste; or
  - 1 kilogram of acutely hazardous waste; or
  - 10 kilograms of inner liners from hazardous waste containers; or
  - 100 kilograms of any residue resulting from an acutely hazardous spill; or
  - any amount of polychlorinated byphenyl (PCB) wastes in concentrations of 50 ppm or greater; or

  who accumulated more than these amounts at any one time during the year.

  You must submit a written response if you notified as a Generator, even if your activity during this reporting year was less than the above amounts.

- Facilities which are authorized to treat, store, or dispose of hazardous waste generated on-site. (Facilities which receive any hazardous waste from an off-site source are required to file monthly reports and are exempt from all Annual Report requirements.)

- Owners/operators of wastewater treatment units (as defined in Massachusetts regulations, 310 CMR 30.605).

WHEN YOU MUST FILE

The Annual Report is due at the Department of Environmental Quality Engineering no later than March 1st for the previous calendar year's hazardous waste activity(ies).

WHAT TO FILE

PART 1 - Identification and Certification: completed by all filers

PART 2 - Summary of Wastes Shipped and Recovered: completed by Generators

PART 3 - Summary of Wastes Treated, Stored or Disposed on site: completed by authorized facilities and wastewater treatment units

You may request that any information, records, or particular part thereof be kept confidential and not considered to be public record when such information, record, or report relates to secret processes, methods of manufacture, or production and, if made public, would divulge a trade secret.

WHERE TO FILE

Mail the Annual Report with the Transmittal Statement to:

Compliance Office
Division of Solid and Hazardous Waste
Department of Environmental Quality Engineering
One Winter Street
Boston, Massachusetts 02108

For further assistance, call (617) 292-5851.

FEB 10 1986

TRANSMITTAL STATEMENT

to be mailed with the Annual Report

W.R. GRACE & Co. — Name of Installation

MAD002081651 — EPA Identification No.

Please check the appropriate response(s):

1. ✓ We are submitting the Annual Report as required.

2. _____ We are submitting Part 1 of the Annual Report but do not feel we are required to complete Parts 2 or 3 for the following reasons:

   _____ We did not manifest any hazardous waste (in quantities described in Who Must File) but will retain our status as a Large Quantity Generator for possible future use, or

   _____ We did not manifest hazardous waste in the quantities described in Who Must File and would like to change our status to Small Quantity Generator,* or

   _____ We did not manifest any hazardous waste, or did not generate as much as 20 kilograms of non-acutely hazardous waste in any one month, at this address and request that our EPA ID Number be withdrawn.*

   _____ We moved our operation during 1985 and are now located at:

   _____

   _____

   New EPA Identification Number: _____

   _____ We generate only waste oil.

* Companies requesting a change of status will be sent a Certification Statement to be completed. The change of status will be confirmed by DEQE in writing. Companies contemplating a move during 1986 should apply for a new EPA Identification Number and complete a Certification Statement to withdraw their existing ID prior to the move.

ANNUAL HAZARDOUS WASTE REPORT

PART 1

Part 1 of the Annual Report is to be completed by all respondents.

1. Current Status of Installation: (check where applicable) (X Generator

( ) Treatment, Storage, Disposal Facility ( ) Wastewater Treatment Unit ( ) Recycling Permittee

2. Reporting Year: Year ending 1985

3. EPA Identification Number: MAD062681651

4. Installation's Name: W.R. GRACE & CO.

5. Installation's Address: HARMONY ST.
ADAMS, MA 01220

6. Installation Contact: Alexander W. Nagy Tel. No.: 413 743 0546

7. Does your installation discharge process wastewater? X Yes ___ No
If yes: (a) NPDES Permit Number MA0250007 or
(b) Groundwater discharge permit _____ or
(c) Name of municipal sewerage system TOWN OF ADAMS

Is the wastewater considered hazardous prior to processing?
___ Yes X No (If yes, complete Part 3, line 16.)

ATTACH MAILING LABEL IF INCORRECT

8. Is your installation registered with the Division of Air Quality Control?
X Yes ___ No (For verification, contact your DEQE Regional office.)

9. Transportation Services Used: (list name and EPA ID number of each)
CLEAN HARBORS (MA) INC. MAD053452637

10. Certification:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

In addition, I understand that any material supplied with this application will not be considered confidential unless I have specifically requested that such material be kept confidential and the Department has made a determination of confidentiality in accordance with 310 CMR 3.00, Regulations Governing Access to and Confidentiality of Department Records and Files under the Hazardous Waste Management Act.

Allan T. Michaud
Authorized Signature of Owner, Operator or Designated Official

2/10/86
Date Signed

ALLAN T. MICHAUD
Print or Type Name

PLANT MANAGER
Title of Person Signing

PART 2

GENERATOR ANNUAL REPORT

To complete this part of the report, refer to all your manifests for the calendar year. Separate your manifests by receiving facility.

11. Generator's EPA Identification Number: MAD006281651

12. Waste Shipped Off-Site: (Complete a separate page for each facility to which waste was shipped. Reproduce additional pages as necessary.)

a) Name of Receiving Facility: CLEAN HARBORS (MA) INC.

b) Facility EPA ID Number: MAD053452637

c) Facility Address: 385 QUINCY AVE, BRAINTREE MA
(Street or P.O. Box) (City) (State)

(If the waste was exported to a foreign country, enter Waste Exported on line b. and identify the U.S. border point of departure in Comments, line 13.)

Line Number	A Description of Waste	B EPA Waste Number	C Quantity of Waste	D Unit Code (G,P,T,Y)	E Receiving Facility Handling Code
1	WASTE FLAMMABLE LIQUID NOS	D001	144,400	P	S01, T06
2	WASTE FUEL OIL #6 NOS	D001	400	P	S01

Instructions:

A. To identify your wastes, refer to your manifests. The description will usually be the U.S. DOT shipping name. Use a separate line for each type of waste. Number lines consecutively. Duplicate page as necessary.

B. The EPA Waste Number (Block I. on the Uniform Manifest Form) can also be found in Massachusetts regulations, 310 CMR 30.120-30.136. The number will be a 4-digit code, beginning with a letter, followed by 3 numbers.

C. Enter the total amount of this particular waste which was shipped to this facility during the calendar year.

D. The unit codes are: G - gallons; P - pounds; T - tons; Y - cubic yards. If you shipped waste in 55 gal. drums, multiply number of drums by 55, enter G.

E. Receiving facility handling codes are found in Block K on the Uniform Manifest. This code will be a letter (S, T, or D), followed by 2 numbers.

Generator's EPA Identification Number: MAD002081651

13. Comments (refer to line number): Use this space to explain any entry in (12).

14. Waste Reduction and On-Site Recovery by Generator (required for recycling permittees):

Manifests from large quantity generators must contain a certification that the volume and/or quantity and toxicity of the waste have been reduced to the maximum degree economically practicable and the method used to manage the waste minimizes risk to the extent practicable.

A. Type of activity: (Check where appropriate)

1) Treatment as an integral part of the manufacturing process (as defined in Mass. regulations, 310 CMR 30.010) _____

2) Recycling by permit (as defined in 310 CMR 30.143) _____

3) Oil and water separation (as defined in 310 CMR 30.202:10) _____

4) Other (please specify, for example, substitution, process modification, sludge reduction, etc.)

_____

_____

_____

B. Amount: (estimated annual quantity)

1) Total waste entered for processing: _____ gallons

2) Total amount of product: _____ gallons

C. Description of waste and process:

If you have more than one recovered or reduced material, duplicate this page for each.

TO: A. T. Michaud - Adams DATE: February 6, 1985

FROM: G. W. Siegel SUBJECT: Waste Disposal Vendors

CC: J. F. Murphy, Jr.

In responce to your concern about the increasing cost of hazardous waste disposal I have gathered the names of other firms that could handle the proper transportation, tracking, and disposal of the waste currently sent to Recycling Industries in Braintree. You should be aware that only CECOS has its own permitted landfill so that the other firms would eventually have to take the waste either to the CECOS facility, or one of Waste Management's(SCA) landfills. The fact that these other companies are not the actual disposer should not automatically rule them out. They can usally obtain volume discounts from the disposers and are being sucessfully used in Morristown and Acton.

The only precaution that needs to be taken before going with a new vendor is that you understand exactly how and where the waste will be disposed of, and visit each of the planned disposal locations. Jim or I can assist you with the site visits and review any proposed contracts.

CECOS International, Inc. 2321 Kenmore Avenue Buffalo, NY 14207	Customer Service Dept. 1-800-828-1608 716-873-4200
Pollution Control Unlimited P.O. Box 106 East Boston, MA 02128	Rick Brodie 617-561-0100 (tank testing also)
Environmental Waste Technology, Inc. P.O. Box 362 Newton Highlands, MA 02161	Frank Stufano 617-332-2877
Resource Technology Servives, Inc. Six Berkely Road Devon, PA 19333	Denise Weber 215-687-4592

If you need any other assistance let me know.

G. W. Siegel

Chemical Waste Management, Inc.
Assembly Square Office Park
5 Middlesex Avenue
Somerville MA 02145
Mike Fist (617)625-6310

File - N.Y. Hazardous Waste

LEXINGTON Polyfibron Division **GRACE**

To: L. A. Scher - New York

Date: April 18, 1984

From: G. W. Siegel

Subject: Environmental Impairment Liability Insurance Application

cc: J. F. Murphy, Jr.

ADAMS HAZ WASTE

Attached are the Environmental Impairment Liability Insurance Application forms for the applicable Polyfibron locations. Since Owensboro disposes its wastewater treatment plant sludge on-site, the longer application form was used.

If you need additional information, please let me know.

G. W. Siegel

GWS/mlr

Attachments

Name of Applicant: W. R. Grace & Co. EPA I.D. No.: MAD002081651

Location of this Fac: Adams, Massachusetts

SHANE MORAHAN & COMPANY, INC / ONE AMERICAN PLAZA / EVANSTON ILLINOIS 60201 / PHONE (312) 866-3300

SUPPLEMENTAL APPLICATION FOR ENVIRONMENTAL IMPAIRMENT LIABILITY INSURANCE (CLAIMS MADE BASIS)

APPLICANT'S INSTRUCTIONS:

1. Complete a supplemental application for each location.
2. Answer all questions; if the answer to any question is NONE, please state NONE.

1. GENERATORS

a. Describe the operations and/or processes which produce solid or liquid wastes that require landfilling, permanent container storage, cineration, or some other bulk disposal method.

Operation/Process	Manufactured Product	Raw Materials
Rubber coating of fabric and paper	Printing Blankets	Rubber, paper, c vas, latex, tolu MEK, 1-nitropropane

b.

Identity Waste (chemical name, if known)	Waste Form (liquid, solid, sludge, etc.)	Quantity Per Year (tons, cubic yds., drum etc.)
Toluene	Liquid	7.3 tons
Methyl ethyl ketone	Liquid	0.5 tons
Rubber dissolved in solvent (i.e. principally toluene with small amounts of MEK or 1-nitro-propane)	Semi-solid	46.2 tons

c. If any waste materials are temporarily stored on-site for more than 24 hours before ultimate disposal, please descri the wastes that might be so stored, the nature of storage, and the longest estimated period of time that wastes mig be stored before ultimate disposal.

Types of Waste that might be stored	Nature of Storage	Estimated longest storag period
All of the above	Drum storage on a secured outside storage area	90 day

d. Describe the location of your waste disposal facilities. ☐ On manufacturing/Processing Site ☒ Off-site

i) If, off-site, state whether disposal facility is operated by: ☐ Self ☒ Contractor.

ii) If, off-site, state whether transport to facility is performed by: ☐ Self ☒ Contractor.

e. If contractor hauls your waste to the disposal site, please name: Recyling Industries, Inc.

2. EXPOSURES

a. Check the one that most adequately describes the area in which you are located: Industrial ☐ Commercial ☐ Residential ☐ Rural Agricultural ☐ Other ☐ Describe The plant is located off a side street adjacent to a small river in a small New England manufacturing town.

b. Describe immediate adjacent properties. Behind the plant is undeveloped. The plant is along side a small river which is densely residential on the opposite side.

3. LOSS PREVENTION & CONTROL

a. Designate the person(s) responsible for environmental protection at this facility: Allan Michaud, Russell Tower, Gary Siegel

b. If the written plan to minimize damage for this facility is different from 2(b) of the general application please attach. Otherwise, indicate "same". Same

c. If the formal health and safety program for employees at this facility is different from 2(d) of the general application please attach. Otherwise indicate "same". Same

4. Attach a copy of 3510 (5-80) (application for Hazardous Waste Permit) filed with the EPA for this facility, including a copy of the topographic map filed with the EPA.

5. Attach a copy of your most recent 8700-13 (5-80) (Annual Facility Report).

I understand information submitted herein becomes a part of my General Application for Environmental Impairment Liability and is subject to the same representations and conditions.

Signature of Applicant James F. Murphy, Jr. Date April 18, 1984

James F. Murphy, Jr.

Commonwealth of Massachusetts

Department of Environmental Quality Engineering

Proposed

ANNUAL HAZARDOUS WASTE REPORT

REC. ENG. FEB 29 19

This form must be used for submission of annual reports by generators of hazardous waste and facilities which treat, store, use, or dispose of hazardous waste that is generated at the facility site. You may request that any information, records, or particular part thereof be kept confidential and not considered to be public record when such information, record, or report relates to secret processes, methods of manufacture, or production and, if made public, would divulge a trade secret. Please refer to the specific instructions for generators or facilities before completing this form.

1. Type of report: GENERATOR, FACILITY

2. Reporting year: 1983

3. Installation's name and identification number:
   W. R. GRACE + CO. — MAD002081651

4. Installation address:
   HARMONY ST.
   ADAMS, MA.

5. Installation Contact and telephone number:
   RUSSELL F. TOWER 413-743-4365

6. Transportation Services used (for Part 1A reports only):
   RECYCLING INDUSTRIES, INC. } MAD053452631
   SCA CHEMICAL SERVICES (MA), INC. }

7. Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

In addition, I understand that any material supplied with this application will not be considered confidential unless I have specifically requested that such material be kept confidential and the Department has made a determination of confidentiality in accordance with Part 12 of the regulations.

Allan T. Micnaud	Allan T Micnaud	2/28/84
Print or type name	Authorized Signature	Date signed

GENERATOR ANNUAL REPORT - PART IA

8. Generator's identification number: MAD002081651

9. Facility's identification number: MAD053452531

10. Facility name: RECYCLING INDUSTRIES, INC. } SAME
SCA CHEMICAL SERVICES (MA), INC. }

11. Facility address (street or P.O. Box, city, state, & zip code):
385 QUINCY AVE.
BRAINTREE, MA. 02184

12. Waste identification:

Line Number	A. Description of Waste	B DOT Hazard Class	C Hazardous Waste Number	D Amount of Waste
1	RUBBER DISSOLVED IN TOLUENE, 1-NITROPROPANE + METHYL ETHYL KETONE	07	D001	25700 #
2	RUBBER DISSOLVED IN TOLUENE, METHYL ETHYL KETONE + ISOPROPYL ALCOHOL	"	"	4500 #
3	RUBBER DISSOLVED IN TOLUENE + METHYL ETHYL KETONE	"	"	19200 #
4	SPENT METHYL ETHYL KETONE + ISOPROPYL ALCOHOL	"	"	5200 #
5	RUBBER DISSOLVED IN TOLUENE	"	"	27,350 #
6	RUBBER DISSOLVED IN TOLUENE + ACETONE	"	"	450 #
7	RUBBER DISSOLVED IN TOLUENE + 1-NITROPROPANE	"	"	6,150 #
8	RUBBER DISSOLVED IN TOLUENE + ISOPROPYL ALCOHOL	"	"	9,450 #
9	RUBBER DISSOLVED IN TOLUENE, 1-NITROPROPANE + ISOPROPYL ALCOHOL	"	"	1,800 #
10	RUBBER DISSOLVED IN 1-2-DICHLOROPROPANE, TOLUENE, 1-NITROPROPANE + METHYL ETHYL KETONE	"	"	450 #
11	TOLUENE MIXED IN WATER	"	"	7100 #
12	WASTE FUEL OIL #6 CONTAINED IN SOIL	01	MC01	450 #
13	WASTE FUEL OIL #6	"	"	400 #
14	WASTE TETRAHYDROFURAN	07	D001	400 #
15	PVC RESIN + RUBBER DISSOLVED IN TOLUENE, METHYL ETHYL KETONE + ISOPROPYL ALCOHOL	"	"	3750 #
16	PVC RESIN + RUBBER DISSOLVED IN TOLUENE + ISOPROPYL ALCOHOL	"	"	1250 #
17	GLASS JARS HOLDING RUBBER DISSOLVED IN HALOGENATED AND NON-HALOGENATED SOLVENTS	"	"	5200 #

13. Comments (enter information by line number - see instructions):

NONE

14. Waste identification:

Line Number	A. Description of Waste	B Hazardous Waste Number	C Handling Method	D Amount of Waste
1	RUBBER DISSOLVED IN TOLUENE, 1-NITROPROPANE + METHY ETHYL KETONE	D001	S01	25,700 *
2	RUBBER DISSOLVED IN TOLUENE, METHYL ETHYL KETONE + ISOPROPYL ALCOHOL	"	"	6,500 *
3	RUBBER DISSOLVED IN TOLUENE + METHYL ETHYL KETONE	"	"	10,200 *
4	SPENT METHYL ETHYL KETONE + ISOPROPYL ALCOHOL	"	"	5,200 *
5	RUBBER DISSOLVED IN TOLUENE	"	"	27,550 *
6	RUBBER DISSOLVED IN TOLUENE + ACETONE	"	"	450 *
7	RUBBER DISSOLVED IN TOLUENE + 1-NITROPROPANE	"	"	6,150 *
8	RUBBER DISSOLVED IN TOLUENE + ISOPROPYL ALCOHOL	"	"	1,450 *
9	RUBBER DISSOLVED IN TOLUENE, 1-NITROPROPANE + ISOPROPYL ALCOHOL	"	"	1,800 *
10	RUBBER DISSOLVED IN 1-2-DICHLOROPROPANE, TOLUENE, 1-NITROPROPANE + METHYL ETHYL KETONE	"	"	450 *
11	TOLUENE IN WATER	"	"	1,100 *
12	WASTE FUEL OIL #6 CONTAINED IN SOIL	M001	"	450 *
13	WASTE FUEL OIL #6	"	"	450 *
14	WASTE TETRAHYDROFURAN	D001	"	400 *
15	PVC RESIN + RUBBER DISSOLVED IN TOLUENE, METHYL ETHYL KETONE + ISOPROPYL ALCOHOL	"	"	3,950 *
16	PVC RESIN + RUBBER DISSOLVED IN TOLUENE + ISOPROPYL ALCOHOL	"	"	1,250 *
17	GLASS JARS HOLDING RUBBER DISSOLVED IN HALOGENATED AND NON-HALOGENATED SOLVENTS	"	"	5,200 *

15. Comments (enter information by line number):

NONE

16. Cost estimates for facilities:

Closure $ 13,622 * Post-Closure $ ——

* total Closure estimate in 1983 dollars

J. F. Murphy, Jr.
November 12, 1980

WASTE IDENTIFICATION			SHIPPING REQUIREMENTS					
			Manifest Entries			Labels		
Waste Product Or Raw Material	EPA Hazard Classification	EPA Hazardous Waste No.	DOT Proper Shipping Name	DOT Hazard Classification	UN Or NA No.	DOT	Required EPA Hazardous Waste	DOT Markings Required On Packages
1-1 Dichloroethylene		U-078	Waste 1-1 Dichloroethylene	Flammable Liquid	UN1150	Flammable Liquid	Yes	Waste 1-1 Dichloroethylene
Ethyl Acrylate	Ignitable	U-113	Waste Ethyl Acrylate	Flammable Liquid	UN1917	Flammable Liquid	Yes	Waste Ethyl Acrylate
Acrylonitrile		U-009	Waste Acrylonitrile	Flammable Liquid	UN1093	Flammable Liquid and Poison	Yes	Waste Acrylonitrile
Dimethylamine	Ignitable	U-092	Waste Dimethylamine	Flammable Liquid	UN1160	Flammable Liquid	Yes	Waste Dimethylamine
Ethyl Methacrylate		U-118	Waste Ethyl Methacrylate	Flammable Liquid	UN2277	Flammable Liquid	Yes	Waste Ethyl Methacrylate
Methyl Methacrylate	Reactive and Toxic	U-162	Waste Methyl Methacrylate	Flammable Liquid	UN1247	Flammable Liquid	Yes	Waste Methyl Methacrylate
Propylene Dichloride	Ignitable	D-001	Waste Propylene Dichloride	Flammable Liquid	UN1279	Flammable Liquid	Yes	Waste Propylene Dichloride
Methylene Chloride	Ignitable	F-002	Waste Methylene Chloride	ORM-A	Un1593	None	Yes	Waste Methylene Chloride

JFM,JR/mlr
Revised 6/12/81
Corrected 6/17/81

J. F. Murphy, Jr.
November 12, 1980

WASTE IDENTIFICATION			SHIPPING REQUIREMENTS					
			Manifest Entries			Labels		
Waste Product Or Raw Material	EPA Hazard Classification	EPA Hazardous Waste No.	DOT Proper Shipping Name	DOT Hazard Classification	UN Or NA No.	DOT	Required EPA Hazardous Waste	DOT Markings Required On Packages
1-1 Dichloroethylene		U-078	Waste 1-1 Dichloroethylene	Flammable Liquid	UN1150	Flammable Liquid	Yes	Waste 1-1 Dichloroethylene
Ethyl Acrylate	Ignitable	U-113	Waste Ethyl Acrylate	Flammable Liquid	UN1917	Flammable Liquid	Yes	Waste Ethyl Acrylate
Acrylonitrile		U-009	Waste Acrylonitrile	Flammable Liquid	UN1093	Flammable Liquid and Poison	Yes	Waste Acrylonitrile
Dimethylamine	Ignitable	U-092	Waste Dimethylamine	Flammable Liquid	UN1160	Flammable Liquid	Yes	Waste Dimethylamine
Ethyl Methacrylate		U-118	Waste Ethyl Methacrylate	Flammable Liquid	UN2277	Flammable Liquid	Yes	Waste Ethyl Methacrylate
Methyl Methacrylate	Reactive and Toxic	U-162	Waste Methyl Methacrylate	Flammable Liquid	UN1247	Flammable Liquid	Yes	Waste Methyl Methacrylate
Propylene Dichloride	Ignitable	D-001	Waste Propylene Dichloride	Flammable Liquid	UN1279	Flammable Liquid	Yes	Waste Propylene Dichloride
Methylene Chloride	Ignitable	F-002	Waste Methylene Chloride	ORM-A	Un1593	None	Yes	Waste Methylene Chloride

JFM,JR/mlr
Revised 6/12/81
Corrected 6/17/81

DIVISION OF HAZARDOUS WASTE
WESTERN REGION

WASTE INVENTORY FORM

DATE: September 14, 1

COMPANY NAME: W. R. Grace & Co.

ADDRESS: Harmony Street, Adams, Ma.

PHONE NUMBER: 413-743-0546

CONTACT NAME AND TITLE: Edward T. Murphy, Plant Manager

EPA GENERATOR ID NO.: MAD002081651

I. Type of Waste Generated:

Solid: Amount generated/month: _____

Chemical compounds _____ _____

Metals _____ _____

Plastics _____ _____

Explosive, pesticide, PCB _____ _____

Liquids: Amount generated/month: _____

Solvent _____ _____

Chlorinated compounds _____ _____

Oils _____ _____

Acids or bases _____ _____

Chemicals; (Plating or spoiled chemicals) _____ _____

Sludges: (Plating, wastewater, degreasers) Amount generated/month: 13,400 lbs.

From What: Fabric and paper coating

Contains what: Rubber dissolved in solvent

II. Storage:

Are any of the above wastes stored on site for 90 days. If yes, has EPA Part A application been filed? Massachusetts Hazardous Waste Storage License?

Yes. Yes. MAD002081651

III. Transportation:

Name of Transporter: Recycling Industries
Address: 380 Quincy Avenue, Braintree, Ma.
Manifest used? Yes
Massachusetts Hazardous Waste License No.: MAD053452637

IV. Disposal Methods:

A. Lagoon or surface impoundment, number and size _____

B. Landfill (Location) _____

C. Reclaimation - onsite _____

offsite _____

D. Other _____

COMMENTS: _____

Signature: Edward L. Murphy

Title: Plant Manager

U.S. ENVIRONMENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a prepr label, affix it in the space at left. If any o information on the label is incorrect, draw through it and supply the correct inform in the appropriate section below. If the lat complete and correct, leave Items I, II, an below blank. If you did not receive a prepri label, complete all items. "Installation" mea single site where hazardous waste is gener treated, stored and/or disposed of, or a t porter's principal place of business. Please to the INSTRUCTIONS FOR FILING NOT CATION before completing this form. information requested herein is required by *(Section 3010 of the Resource Conservation Recovery Act).*

INSTALLATION'S EPA I.D. NO.	MAD002081651
I. NAME OF INSTALLATION	GRACE W R & CO INC
II. INSTALLATION MAILING ADDRESS	HARMONY ST ADAMS MA 01220
III. LOCATION OF INSTALLATION	HARMONY ST ADAMS MA 01220

DETACH

FOR OFFICIAL USE ONLY

COMMENTS

C | C |

INSTALLATION'S EPA I.D. NUMBER | APPROVED | DATE RECEIVED (yr., mo., & day)

F | T A | C | 1 |

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3

CITY OR TOWN | ST. | ZIP CODE

4

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5

CITY OR TOWN | ST. | ZIP CODE

6

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title) | PHONE NO. (area code & no.)

2 | MURPHY EDWARD T PLANT MANAGER | 413-743-0546

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 | W R GRACE & CO

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

F = FEDERAL
M = NON-FEDERAL

M

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

- [X] A. GENERATION
- [ ] B. TRANSPORTATION (complete item VII)
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your first notification of hazardous waste activity or a subsequent notification.

- [ ] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION EPA I.D. NUMBER: MAD002081651

IX. DESCRIPTION OF HAZARDOUS WASTES

FOR OFFICIAL USE ONLY

W

DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F005	2	3	4	5	6
7	8	9	10	11	12

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U220	32 U107	33 U154	34 U159	35 U226	36
37	38	39	40	41	42
43	44	45	46	47	48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001)	[ ] 2. CORROSIVE (D002)	[ ] 3. REACTIVE (D003)	[ ] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Edward T. Murphy	Edward T. Murphy Plant Manager	8/15/80

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

GENERAL | EPA

I. EPA I.D. NUMBER: F MAD002081651

GENERAL INSTRUCTIONS

If a preprinted label has been provided, it in the designated space. Review the in ation carefully; if any of it is incorrect, through it and enter the correct data i appropriate fill-in area below. Also, if a the preprinted data is absent *(the area t left of the label space lists the inform that should appear)*, please provide it i proper fill-in area(s) below. If the lat complete and correct, you need not com Items I, III, V, and VI *(except VI-B v must be completed regardless)*. Complet Items if no label has been provided. Ref the instructions for detailed item de tions and for the legal authorizations u which this data is collected.

LABEL ITEMS

I. EPA I.D. NUMBER	MAD002081651
FACILITY NAME	GRACE W R & CO INC
V. FACILITY MAILING ADDRESS	HARMONY ST ADAMS MA 01220
VI. FACILITY LOCATION	HARMONY ST ADAMS MA 01220

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to an questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third colum if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activit is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTA
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility *(either existing or proposed)* include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility *(other than those described in A or B above)* which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility *fluids* for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: W. R. GRACE & CO.

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 MURPHY, EDWARD T. PLANT MANAGER	413 743 0546

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX: 3 HARMONY STREET

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 ADAMS	MA	01220

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER: 5 HARMONY STREET

B. COUNTY NAME: BERKSHIRE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
ADAMS	MA	01220	

SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
6411 (specify) .PAPER COATING & GLAZING	(specify) N.A.
C. THIRD	**D. FOURTH**
(specify) N.A.	(specify) N.A.

VIII. OPERATOR INFORMATION

A. NAME: W. R. GRACE & CO.

B. Is the name listed in Item VIII-A also owner? [X] YES [ ] NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL; S = STATE; P = PRIVATE; M = PUBLIC (other than federal or state); O = OTHER (specify)
P (specify)

D. PHONE (area code & no.): A 413 743 0546

E. STREET OR P.O. BOX: HARMONY STREET

F. CITY OR TOWN: ADAMS

G. STATE: MA

H. ZIP CODE: 01220

IX. INDIAN LAND

Is the facility located on Indian lands? [ ] YES [X] NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water): 9 N MA0006009	**D. PSD** (Air Emissions from Proposed Sources): 9 P N.A.
B. UIC (Underground Injection of Fluids): 9 U N.A.	**E. OTHER** (specify): 9 N.A. (specify)
C. RCRA (Hazardous Wastes): 9 N.A.	**E. OTHER** (specify): 9 N.A. (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

The manufacture of paper and textile printing blankets. This involves the coating of paper and textiles with solvent based, rubber coatings. Also includes grinding the surface of the blankets and cutting them to finished product size.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Robert W. Samuels, Vice President	Robert W. Samuels	11-14-80

COMMENTS FOR OFFICIAL USE ONLY

RCRA

EPA [illegible] WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

1										
F	M	A	D	0	0	2	0	8	1	6	5

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APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24 - 29	

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facili revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your fac EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)* — 31

[ ] 2. NEW FACILITY *(Complete item belo* — 32

C	YR.	MO.	DAY
8	7 3	0 6	0 1
15	73 74	75 76	77 78

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY
73 74	75 76	77 78

FOR NEW FACIL PROVIDE THE D *(yr., mo., & day)* C TION BEGAN OF EXPECTED TO B

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS — 22

N.A.

[ ] 2. FACILITY HAS A RCRA PERMIT — 22

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

1	2	13	14	15
C	DUP		T/A	C
				1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
	15 - 18	19 - 27	28	29 - 32		15 - 18	19 - 27	28	29 -
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	11,000	G		7				
2					8				
3					9				
4					10				

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each listed hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	200	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)

W	M	A	D	0	0	2	0	8	1	6	5	1		
1	2											13	14	15

FOR OFFICIAL USE ONLY

W	DUP		2	DUP
1	2		14	15 - 30

IV. DESCRIPTION OF HAZARDOUS WASTES (continued)

No.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (If a code is not entered in D(1))
	23 - 26	27 - 34	35	27 - 28 / 29 - 30 / 31 - 32 / 33 - 34	
1	F 0 0 5	160,000	P	S 0 1	
2	U 2 2 0	100	P	S 0 1	
3	U 1 0 7	100	P	S 0 1	
4	U 1 5 4	100	P	S 0 1	
5	U 1 5 9	100	P	S 0 1	
6	U 2 2 6	100	P	S 0 1	
7	D 0 0 1				Included with above
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. *(enter from page 1)*

													T/A	C
M	A	D	0	0	2	0	8	1	6	5	1			6

V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).*

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground—level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).*

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE *(degrees, minutes, & seconds)*	LONGITUDE *(degrees, minutes, & seconds)*
42° 37' 03"	73° 07' 28"

VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. *(area code & no.)*

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
	C G		

X. OWNER CERTIFICATION

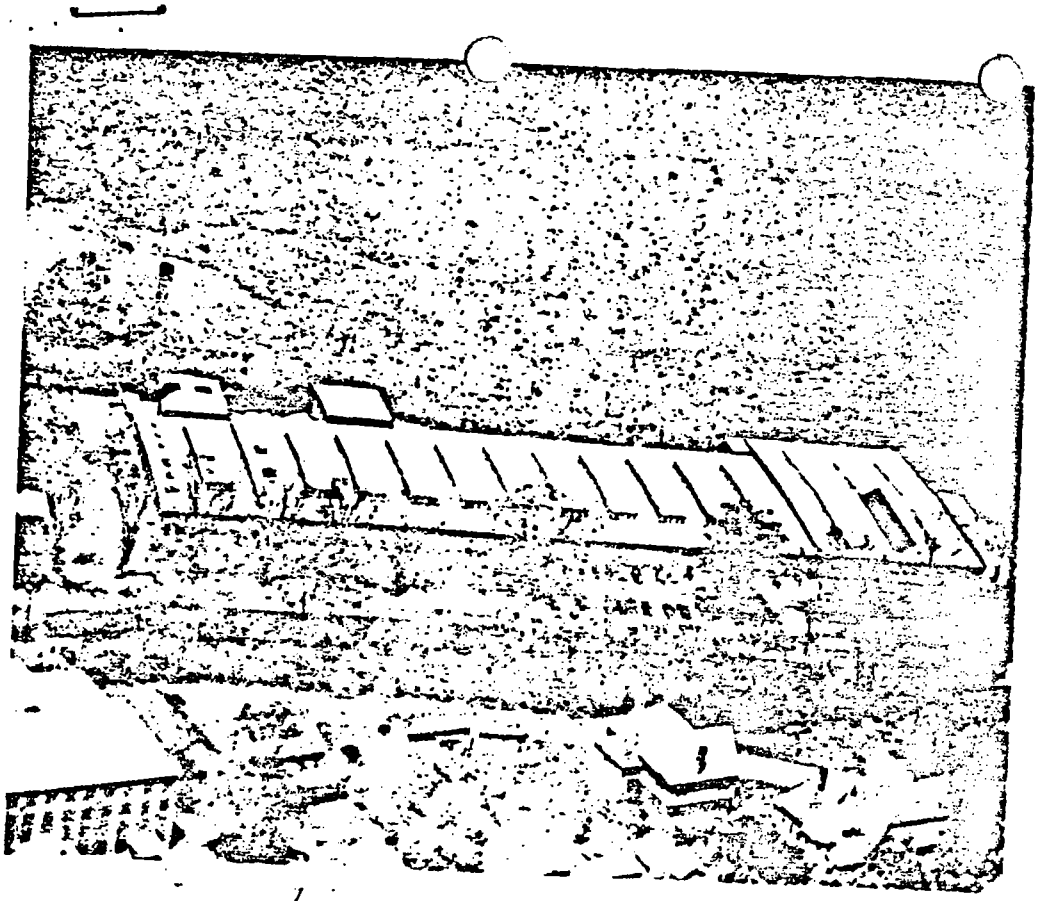
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

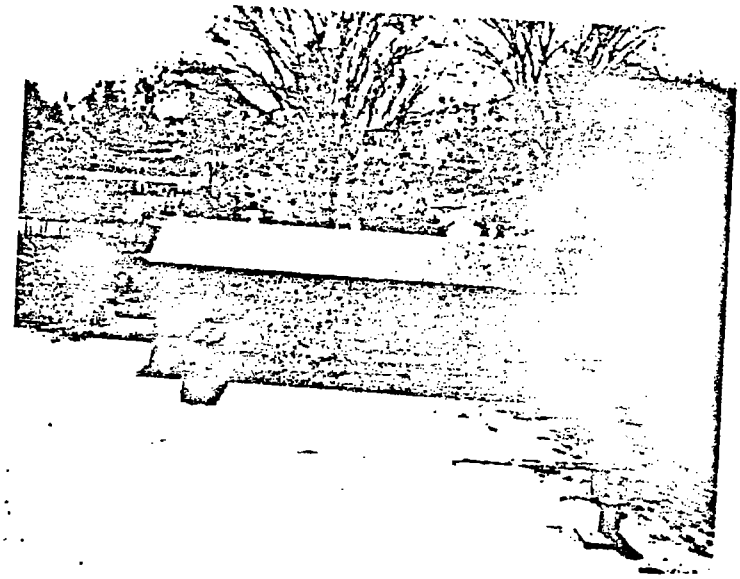
A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED
Robert W. Samuels		11-14-80

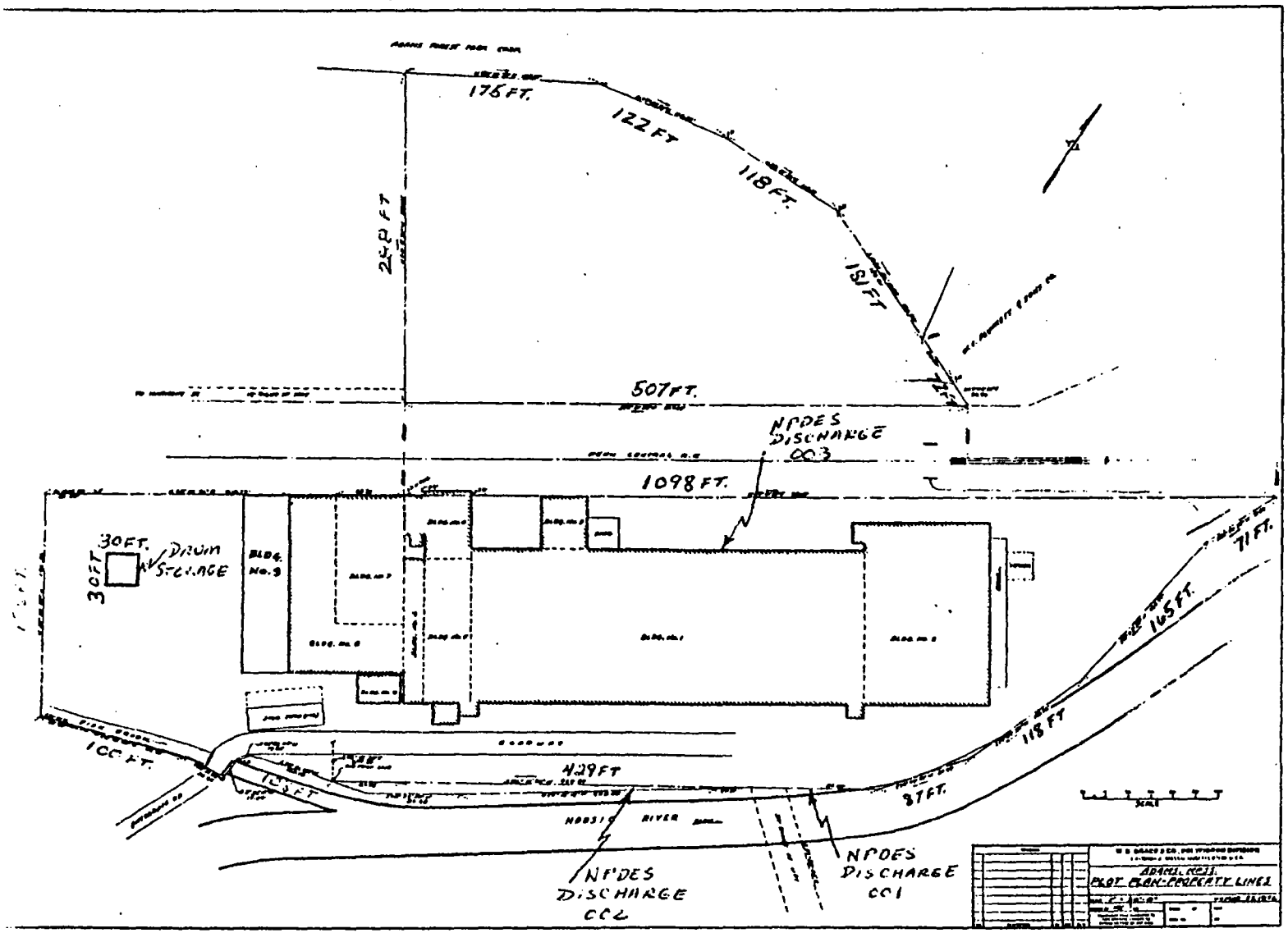
XI. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME *(print or type)*	B. SIGNATURE	C. DATE SIGNED

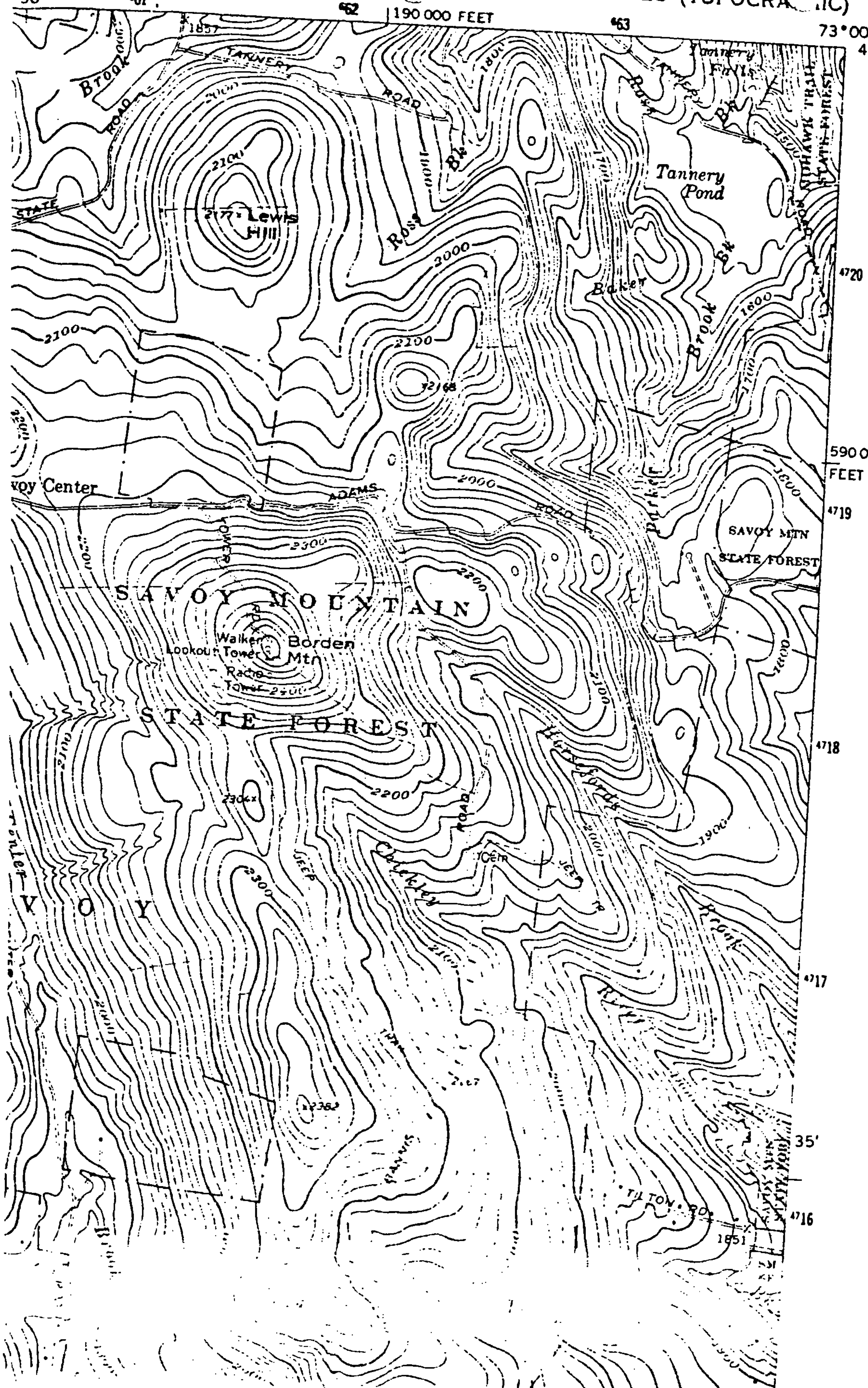


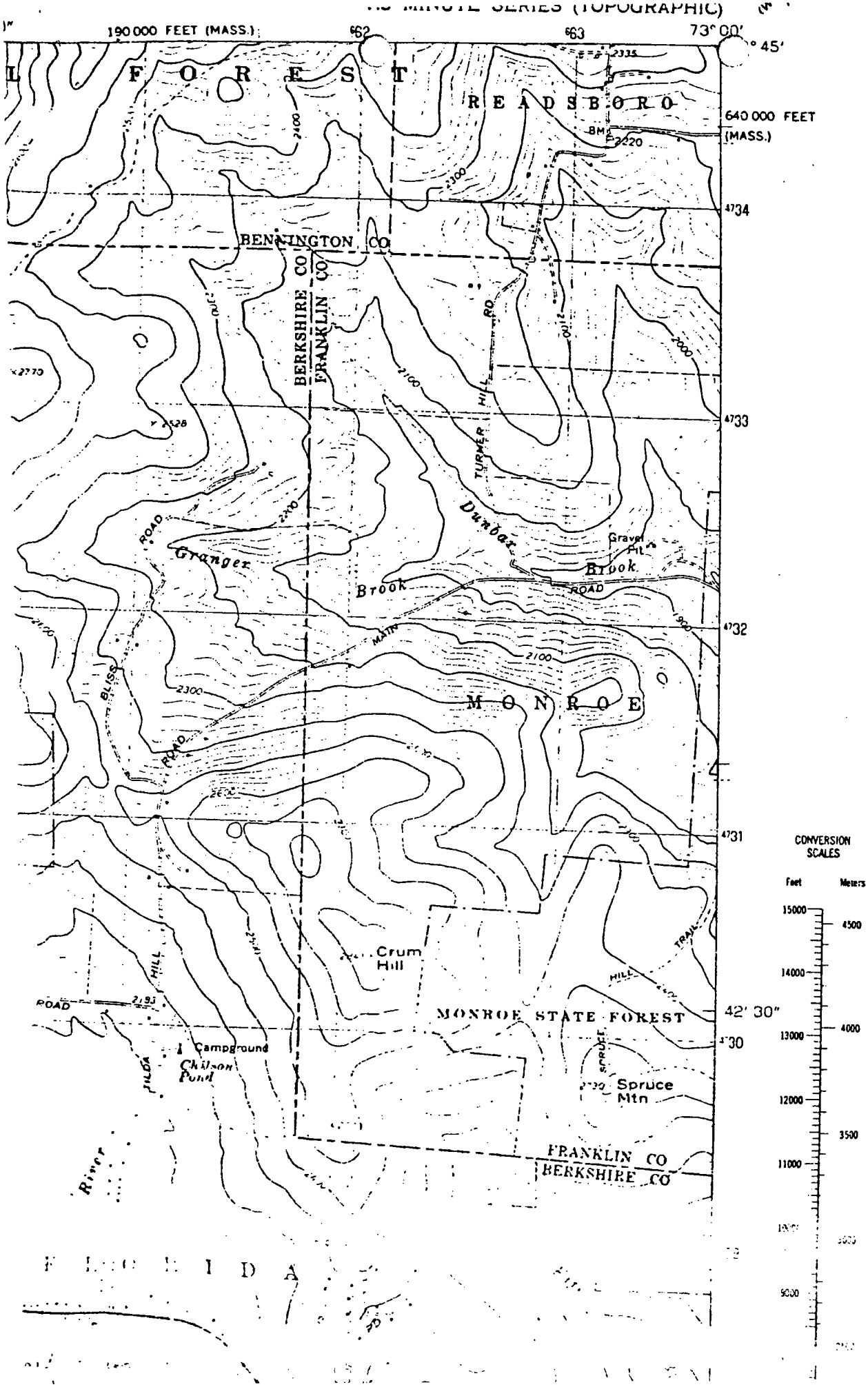


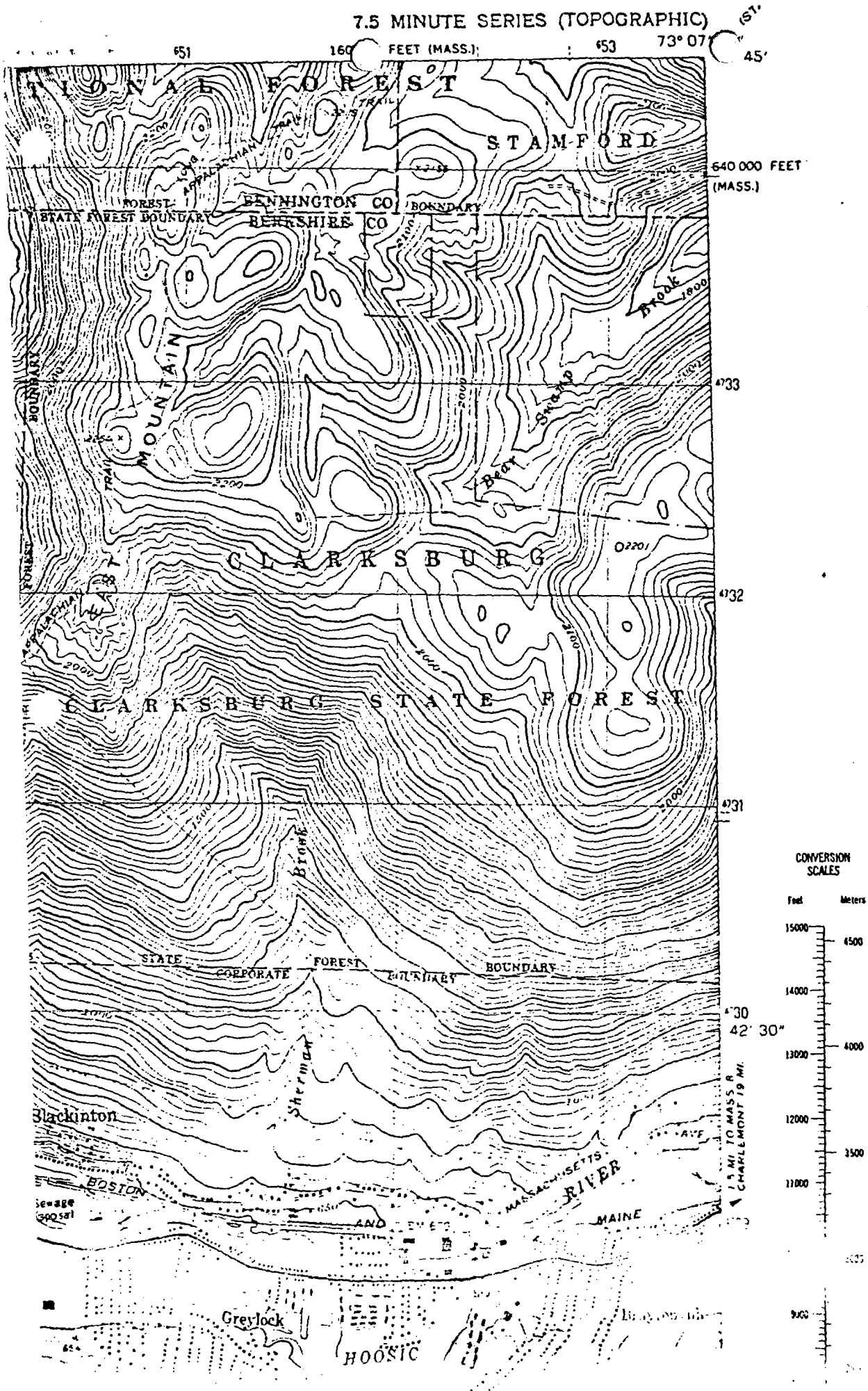

176 FT.
122 FT
118 FT.
151 FT
242 FT
507 FT.
NPDES DISCHARGE 003
1098 FT.
30 FT.
30 FT.
DRUM STORAGE
BLDG. NO. 9
100 FT.
439 FT
118 FT
165 FT.
71 FT.
87 FT.
NPDES DISCHARGE 002
NPDES DISCHARGE 001
W. R. GRACE & CO.
ADAMS, MASS.
PLOT PLAN: PROPERTY LINES

WINDSOR QUADRANGLE
MASSACHUSETTS–BERKSHIRE CO.
7.5 MINUTE SERIES (TOPOGRA[illegible]IC)

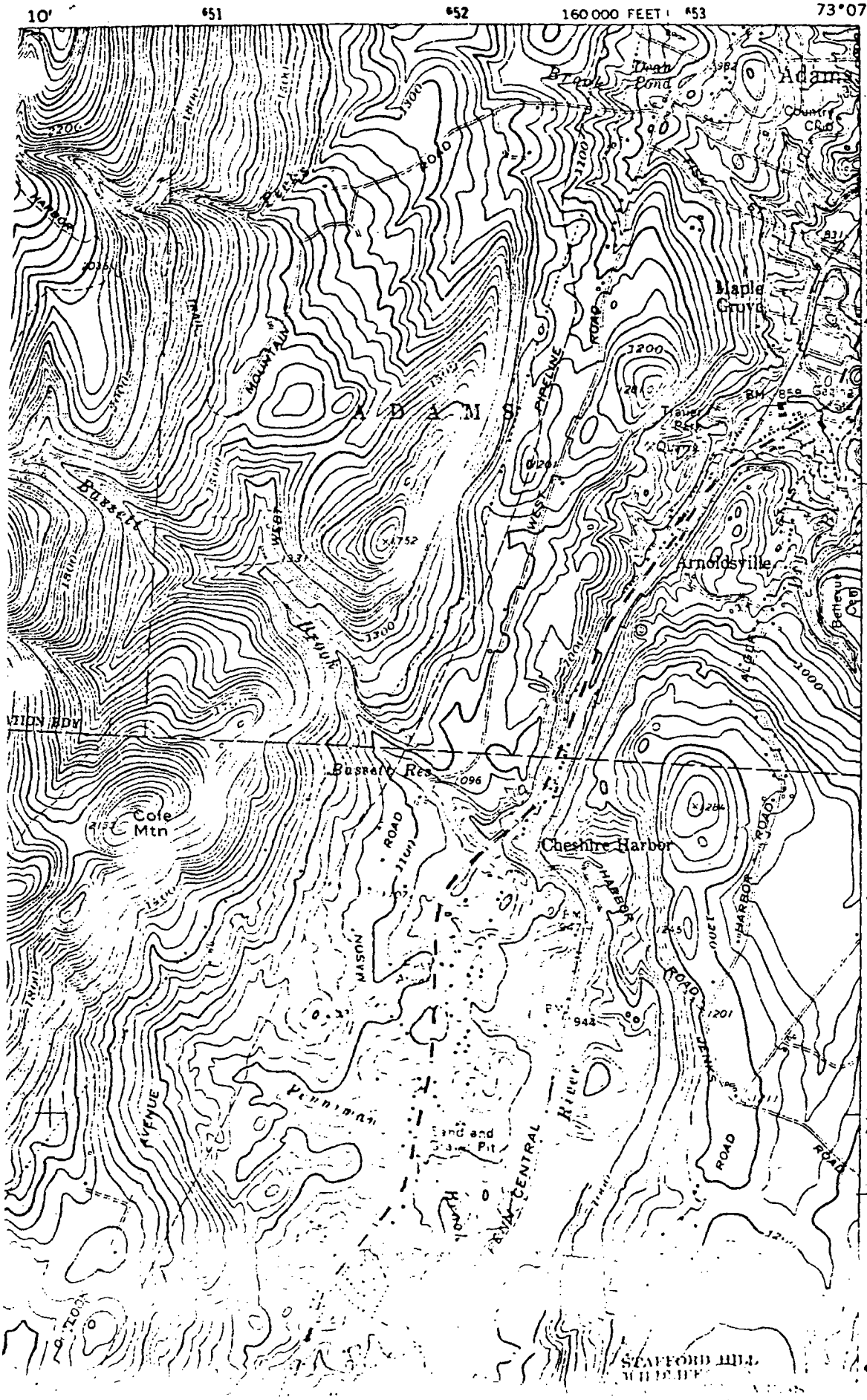
6469 III NW (ROWE)




190 000 FEET (MASS.)
662
663
73° 00'
45'
640 000 FEET (MASS.)
F O R E S T
R E A D S B O R O
BM 2320
BENNINGTON CO
BERKSHIRE CO
FRANKLIN CO
TURNER HILL RD
Granger
ROAD
Brook
Dunbar
Brook
Gravel Pit
ROAD
MAIN
BLISS
ROAD
M O N R O E
Crum Hill
ROAD
HILL
MONROE STATE FOREST
42' 30"
Campground
Chilson Pond
SPRUCE
Spruce Mtn
FRANKLIN CO
BERKSHIRE CO
4734
4733
4732
4731
4730
CONVERSION SCALES
Feet
Meters
15000
4500
14000
4000
13000
12000
3500
11000
9000


7.5 MINUTE SERIES (TOPOGRAPHIC)
73° 07' 45'
651
160
FEET (MASS.)
653
T I O N A L F O R E S T
STAMFORD
640 000 FEET
(MASS.)
STATE FOREST BOUNDARY
BENNINGTON CO
BERKSHIRE CO
BOUNDARY
MOUNTAIN
Bear Swamp
Brook
4733
4732
4731
4730
42' 30"
CLARKSBURG
CLARKSBURG STATE FOREST
STATE FOREST BOUNDARY
CORPORATE BOUNDARY
Sherman
Brook
Blackinton
BOSTON
MASSACHUSETTS
RIVER
MAINE
Greylock
HOOSIC
1.5 MI. TO MASS. & CHARLEMONT 19 MI.
CONVERSION SCALES
Feet
Meters
15000
14000
13000
12000
11000
4500
4000
3500

CHESHIRE QUADRANGLE
MASSACHUSETTS–BERKSHIRE CO.
7.5 MINUTE SERIES (TOPOGRAPHIC)



LEXINGTON Polyfibron Division GRACE

To: G. N. Ciampa - Adams
H. A. Johnson - Adams

Date: June 17, 1981

From: J. F. Murphy, Jr.

Subject: Waste Analysis

cc: T. O. Gavin
O. M. Favorito - Cambridge
E. T. Murphy - Adams
L. E. Roy - Adams
N. I. Palmer

In my letter of June 12, 1981 on "Waste Analysis", there is an error in item 3 of the letter, and the last item on the attached list. Methylene chloride has an EPA number of F002 rather than F001.

Attached is a corrected letter and list. Please throw away the original.

J. F. Murphy, Jr.

JFM,JR/mlr

Attachments

LEXINGTON Polyfibron Division GRACE

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H. A. Johnson - Adams

Date: June 12, 1981

From: J. F. Murphy, Jr.

Subject: Waste Analysis

cc: T. O. Gavin
O. M. Favorito - Cambridge
E. T. Murphy - Adams
L. E. Roy - Adams
N. I. Palmer

This confirms my phone conversation with both Johnny Johnson and Greg Ciampa regarding hazardous waste analysis.

For the existing waste material which you now have in the yard, use the following procedure:

1. None of the drums need to have detailed analysis.

2. For those drums which you know to be "rubber dissolved in toluene", the EPA number would be F005. This would be "spent non-halogenated solvent, toluene". The same EPA number would be used for methyl ethyl ketone with rubber dissolved in it.

3. For drums which you know to be "rubber dissolved in methylene chloride", the EPA number would be F002, "spent halogenated solvent, methylene chloride".

4. For all drums which are a mixture of solvents, use the EPA number D001 "ignitable liquid". This would be for any flammable liquid with a flash point below 140°F. The "hazardous waste" label and DOT "flammable liquid" labels would be required and the description should be as close as you can come to describing it, such as "rubber dissolved in a mixture of solvents, toluene, 1-nitropropane and MEK".

5. All drums of hazardous waste containing propylene dichloride must be separated from the non-halogenated waste. These would have an EPA number of D001, "ignitable liquid", and the description should be "halogenated solvent, rubber dissolved in propylene dichloride". If halogenated solvent waste has been mixed with non-halogenated solvent waste, you must assume that the entire drum is halogenated solvent waste. Since halogenated waste is considerably more expensive to dispose of, it is important to keep this type of waste segregated in the future.

6. If the waste does not fall in any of the above categories, give me a call. I have added methylene chloride and propylene dichloride to the original list (copy attached) that I sent out in November, 1980.

Two things that must be remembered when handling hazardous waste are:

1. Hazardous waste added to non-hazardous waste makes the entire container into hazardous waste.

2. A partially full drum of waste costs just as much to dispose of as a full one.

For the present and future, the waste analysis plan that I wrote up, when last in Adams, should be followed. I left this write up with Nel Roy and was the one I discussed with Greg Ciampa and Ed Murphy. Basically, it consisted of using numbered metal tags to identify all waste drums. Nothing but full drums would be stored in the back yard. All material going into drums would be logged for records which could be used when drums are shipped out.

Please let me know when you plan to ship out your first batch of hazardous waste drums. I would like to help out with the manifest, at least for the first time.

J. F. Murphy, Jr.

JFM,JR/mlr

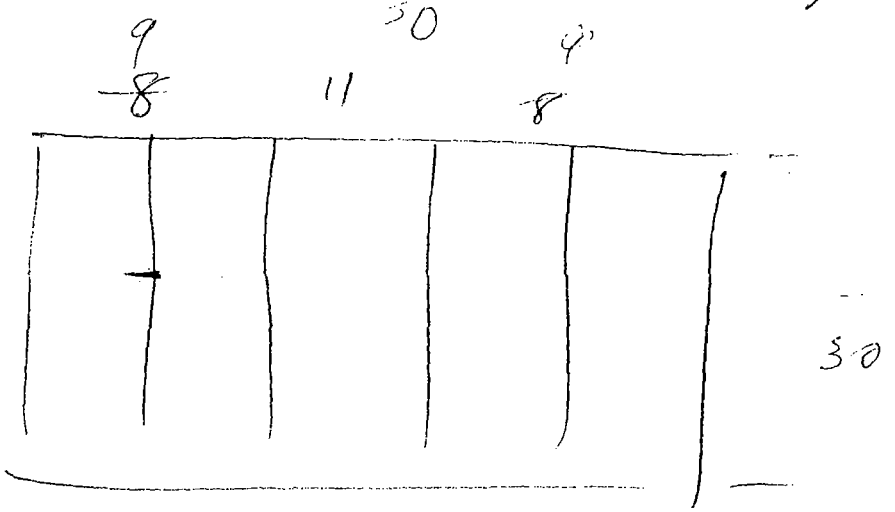
Attachment

Nel Ray

Thinks there is 1000 drums in yard.

80 - 120 are empty. out of 124 - 89 empty.

Thinks there are 30-40 drums / week (? ?)



7 × 4 × 8

28
8
224

Will have 2 men. on Monday - to separate full from empty.

LEXINGTON Polytibron Division GRACE

To: G. N. Ciampa - Adams

Date: June 17, 1981

From: J. F. Murphy, Jr.

Subject: Waste Analysis Plan

cc: T. O. Gavin
E. T. Murphy - Adams
N. I. Palmer

(2) FILE

Attached is the "Waste Analysis Plan" for the interim status requirements for RCRA. This is an expansion of one that I wrote while I was in Adams last.

We discussed this to some degree while I was there, but you and Ed should go over the detailed plan to see if you still agree or want to make changes on how it will operate.

I have checked this out with the EPA and they will accept this approach.

If you have any questions, give me a call.

J. F. Murphy, Jr.

JFM,JR/mlr

Attachment

J. F. Murphy, Jr.
June 17, 1981

ADAMS - RCRA INTERIM STATUS PLAN

WASTE ANALYSIS PLAN

The basic premise on which this plan is based is twofold: (a) as long as we keep a log of what goes into a waste drum, we will know what the composition is at the time it is shipped out of the plant; and (b) since all of the potential waste components (rubber dissolved in one or more of a number of solvents) are compatible, there is no environmental or safety hazard in mixing these components.

The materials which can be in the waste, in addition to the dissolved rubber, are:

Methylene chloride
Propylene dichloride
Trichloroethane
Di n octyl phthalate
Methanol
Methyl ethyl ketone
Toluene

The following procedure will be used in order to assure that the makeup of the waste in the drums will be known.

1. All waste drums will be tagged with numbered metal tags.

2. The numbering system will simply be consecutive numbers, starting at 1 and continuing upward.

3. There will be separate waste drums, with covers, at each coating and mixing area. These drums will be located in specific locations in each area (with lines marked on the floor) and each drum will remain at the location until full before being removed to the outside storage area. There will be space for two waste drums at each area so an empty can be ready if a waste drum should become full during a shift.

4. A permanently located log book will be kept at each waste drum location. When waste is put into the drum, the area foreman will enter in the log the following information:

    a. Waste drum number

    b. Date

    c. Type of waste by compound or solvent name or number

    d. Approximate amount (inches in the drum)

    e. Name of person making the entry

5. The types of waste that will be put into these drums will fall into two classes:

    a. Listed hazardous wastes, such as "spent toluene", EPA number F005

    b. "Ignitable" waste (flash point lower than 140°F), such as rubber dissolved in mixed solvents, EPA number D001

    Halogenated (chlorinated) solvent waste must be segregated. Halogenated solvent waste must never be mixed with nonhalogenated solvent waste. The reason for this is not one of safety, but one of cost. The cost to dispose of a drum of halogenated waste is much higher because any attempt to incinerate a halogenated solvent causes high corrosion in the incinerator and an acid effluent.

6. Completed pages of the log books will be collected once a month and filed with the other interim status written data. When hazardous waste drums are shipped out of the plant, the information on these log sheets will be used to make out manifests and hazardous waste labels for the drums (see instructions under "Manifests" dated November 12, 1980).

JFM,JR/mlr

REQUEST FOR AIRLINE TICKET Prepared By Martha Rose Date June 2, 1981 Ext 2623

Name of Passenger James Murphy Jr. Employee No. _____ Account No. 10158615000003

Home Phone No. 617-879-1498 Requested By Murphy

Class	From	To	Via	Flight no.	Date Flt. Orig.	Time Depart	Time Arrival	Status	B	L	D	S	Stops

Date to be Teleticketed _____ Airline _____ Agent _____

Copies to:	Car Rental	Hotels	For Accounting Purposes Only
Home		Treadway Williams Inn	Date _____
		Main Street (nr. RTES 2 & 7)	Account _____
		Williamstown 413-458-9371	Completed _____
		Single, Wed., June 3rd	Purpose _____
		conf by: Jodie	Time Request Received
		Guaranteed Late Arrival	
		Yes [X] No [ ]	

116-7

File Adams RCRA 6/4/81 JIM

848-0612

Recycling Ind. Paul Costain

Gave previous to 2
Chem. Waste Management. — Flam. $
can incinerate 92/drum

Solid — Essentially No free liquid.
$92 + $10 Drum prep to solidify.

Liq. flammables in closed head drums. that can't be incinerated 92+20 for storage
Extend May 19th to Nov. — to bury liquid flammable

Baltimore. — incinerate in drums.
and collect solvent

Sort of skirt analysis.
Analysis of how it will be handled
If chlorine or not.

Manifest
Toluene & Rubber —
Spent or Waste Toluene

20% — 50% —

Satisfy Recycling Ind.
May want to analyze to get range

LEXINGTON Polyfibron Division GRACE

To: G. N. Ciampa - Adams
H. A. Johnson - Adams

Date: June 17, 1981

From: J. F. Murphy, Jr.

Subject: Waste Analysis

cc: T. O. Gavin
O. M. Favorito - Cambridge
E. T. Murphy - Adams
L. E. Roy - Adams
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Attached is a corrected letter and list. Please throw away the original.

J. F. Murphy, Jr.

JFM,JR/mlr

Attachments

File Adams Liquid Waste

GRACE

Polyfibron Division

Industrial Chemicals Group
W.R. Grace & Co.
Harmony Street
Adams, Mass. 01220

(413) 743-0546

December 30, 1981

Mr. George Woods
Cecos International Inc.
5001-E Greentree Executive Campus
Marlton, N. J. 08053

Dear George:

Enclosed is a copy of the fifth waste product record from the Adams facility. This encompasses all of the lab samples which are checked by the Quality Control Lab.

The drum contains approximately 300-400 half pint glass jars which contain process samples. An inert absorbent will be placed into the drum when it is full of jars. Most of the samples have set-up and are totally solid, others are raw Toluene, Mek and Propyl Alcohol.

Sincerely,

W. R. GRACE & CO.

Paul S. Paresky

Paul S. Paresky

PSP:sml
Enc.

cc: J. Murphy - Lex.
R. G. Tower

F: Adams Liquid Waste

GRACE

Polyfibron Division

Industrial Chemicals Group
W.R. Grace & Co.
Harmony Street
Adams, Mass. 01220

(413) 743-0546

December 18, 1981

Mr. George Woods
Cecos Intl. Inc.
5001-E Greentree Executive Campus
Marlton, N. J. 08053

Dear George:

Enclosed is a waste product record of the chlorinated solvent waste. This type is rarely produced. Some of this waste may be contained in the semi-solid drums which will be shipped during our first order.

The chlorinated waste is now being segregated from all other types.

I am waiting for your disposition on our sample jars. These jars are packed into 55 gallon drums. They contain all of the types of waste described in W.P.R. #'s 1, 2, 3, 4.

Sincerely,

W. R. GRACE & CO.

Paul S. Paresky

Paul S. Paresky

PSP:sml
Enclosure

cc: J. Murphy - Lex.
R. G. Tower

REC. ENG. DEC 23

CECOS INTERNATIONAL INC.
CHEMICAL AND ENVIRONMENTAL CONSERVATION SYSTEMS
P.O. Box 619 • Niagara Falls, N.Y. 14302 • 716/731-3281

WASTE PRODUCT RECORD

THIS SECTION TO BE COMPLETED BY THE WASTE GENERATOR
(See instructions for guidance in completing this record)

PRODUCT CODE

WPR NUMBER

GENERATOR NAME: W R GRACE CO.

GENERATOR'S CUSTOMER NUMBER

ADDRESS: HARMONY ST ADAMS MA. 01220

WASTE NAME: PROCESS SAMPLES

PROCESS GENERATING THIS WASTE:

TECHNICAL CONTACT FOR THIS WASTE

NAME: RUSS TOWER — PHONE NO.: 413 743 0546

NAME: PAUL S. PARESKY — PHONE NO.: SAME

WASTE DESCRIPTION (AT 70°F)

PHYSICAL STATE : ☐ SOLID ☑ SEMI-SOLID SAMPLES WHICH HAVE SET-UP (DESCRIBE) ☐ LIQUID

VISCOSITY : ☐ LOW ☐ MEDIUM ☐ HIGH

SPECIFIC GRAVITY/DENSITY : N/A

FLASH POINT (°F) : N/A ☐ CLOSED CUP ☐ OPEN CUP

pH (INDICATE RANGE) : N/A

LIQUIDS

PHASE/LAYERING : TOP ____ % ☐ SOLID ☐ LIQUID
MIDDLE ____ % ☐ SOLID ☐ LIQUID
BOTTOM ____ % ☐ SOLID ☐ LIQUID

SOLIDS: ☐ BY WEIGHT ☐ BY VOLUME : DISSOLVED ____ % SUSPENDED ____ %

MATERIAL/OILS

BTU/LB : ____

ASH CONTENT @ 650°C : ____

CHLORINE BY WEIGHT (%) : O-TRACE OR ____ %

SULFUR BY WEIGHT (%) : O-TRACE OR ____ %

CHEMICAL COMPOSITION (Use Chemical or IUPAC Nomenclature)

COMPONENT	CONCENTRATION	RANGE
NEOPRENE RUBBER	85	75-95
MEK		
TOLUENE		
NITROPROPANE	5%	5%-15%
PROPANOL	total	
METHYLENE CHLORIDE		
1-2 DICHLOROPROPANE		
LATEX	5	0-10%
SPEEDI DRY	5%	0-10%

IS THIS WASTE RADIOACTIVE, EXPLOSIVE, PYROPHORIC OR SHOCK SENSITIVE? ☐ YES ☑ NO

IS THIS WASTE WATER OR AIR REACTIVE? ☐ YES ☑ NO

DOES THIS WASTE MATERIAL CONTAIN:
OSHA CARCINOGENS ☐ YES ☑ NO
PESTICIDES ☐ YES ☑ NO
PCB's ☐ YES ☑ NO

IF YES, REFLECT IN CHEMICAL COMPOSITION.

SPECIAL OR UNIQUE WASTE HANDLING PRECAUTIONS: ____

Is this waste "A Hazardous Waste" as defined by Part 261 of the U.S. Environmental Protection Agency Resource Conservation & Recovery Act? (RCRA) ☑ YES ☐ NO

FACILITY EPA I.D. NUMBER: MAD 002081651

IF YES PROVIDE THE EPA HAZARDOUS WASTE NUMBER(S)

D001

SHIPPING REQUIREMENTS

a. Indicate how this waste material is to be shipped.
☑ Drum ☐ Bulk ☐ Other ____
Size of Drum: 55 GALLON

b. Shipping Frequency
Quantity: 12 Per: YEAR

c. Transportation equipment requirements (for bulk liquids state required tanker specifications): REQUIRED

d. Scheduling contact: RUSS TOWER Telephone: 413 743 0546

CERTIFICATION

I hereby certify that I have personally examined and am familiar with the information submitted in this and all attached documents. Based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete to the best of my knowledge and ability and that all known and suspected hazards have been disclosed.

DATE: 12/30/81 — SIGNATURE: Paul S. Paresky — TITLE: ENVIRONMENTAL CONTROL

CECOS DOCUMENTATION

A. DISPOSAL SITE ____

B. DISPOSAL METHOD:
1. ____ 3. ____
2. ____ 4. ____

C. REGULATORY CORRESPONDENCE
1. TYPE ☐ NOTIFICATION ☐ SUPPLEMENTAL REQUEST
2. ID NUMBER ____ (DEC "N" OR "R" NUMBER)

DATE | SIGNATURE | TITLE

CECOS INTERNATIONAL INC.
Uniform state
HAZARDOUS WASTE MANIFEST
SAMPLE

WORK ORDER NO.
WASTE MANIFEST NO.

PART A

NAME	SITE ADDRESS	PHONE NO.	EPA, I. D. NO.
GENERATOR			
TRANSPORTER NO. 1			
TRANSPORTER NO. 2 (IF ANY)			
TREATMENT STORAGE OR DISPOSAL FACILITY CECOS INTERNATIONAL, INC.			

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED FILL OUT THE FOLLOWING AS APPROPRIATE
THIS FORM IS NO ____ OUT OF A TOTAL OF ____ THE FIRST MANIFEST DOCUMENT NO IS ____

GENERATOR

PROPER U.S. DOT SHIPPING NAME	CECOS PROD CODE	U.S. DOT HAZARD CLASS	UN NUMBER	FORM: SOLID	LIQUID	GAS	SLUDGE	QTY.	UNITS: GALLONS	CU. YDS.	POUNDS	TONS	CONTAINERS NO. TYPE	EPA HAZ. CODE	EPA WASTE TYPE

SPECIAL HANDLING INSTRUCTIONS OR LIQUID CONTAINER EXEMPTION OR DESCRIPTION OF ADDITIONAL WASTES INCLUDED IN SHIPMENT OF A NON HAZARDOUS NATURE WHICH IS NOT HAVE TO BE MANIFESTED

GENERATOR'S CERTIFICATION: This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA, and the State. The waste described above were consigned to the Transporter named. The Treatment, Storage or Disposal Facility can and will accept the shipment of hazardous waste and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge

GENERATOR'S SIGNATURE | TITLE | DATE SHIPPED | EXPECTED ARR. DATE | TRAILER LICENSE NO.

THIS SECTION IS FOR REGULATORY AGENCY DOCUMENTATION

A. APPROVAL STATUS: ☐ APPROVAL ☐ APPROVAL WITHHELD ☐ DISAPPROVED

B. REASONS OR SPECIAL CONDITIONS FOR APPROVAL STATUS:

DATE | SIGNATURE | TITLE/AGENCY

US EPA ARCHIVE DOCUMENT

File Adams Liquid Waste

GRACE

Polyfibron Division

Industrial Chemicals Group
W.R. Grace & Co.
Harmony Street
Adams, Mass. 01220

(413) 743-0546

December 30, 1981

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Marlton, N. J. 08053

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W. R. GRACE & CO.

Paul S. Paresky

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PSP:sml
Enc.

cc: J. Murphy - Lex.
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F: Adams Liquid Waste

GRACE

Polyfibron Division

Industrial Chemicals Group
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(413) 743-0546

December 18, 1981

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I am waiting for your disposition on our sample jars. These jars are packed into 55 gallon drums. They contain all of the types of waste described in W.P.R. #'s 1, 2, 3, 4.

Sincerely,

W. R. GRACE & CO.

Paul S. Paresky

Paul S. Paresky

PSP:sml
Enclosure

cc: J. Murphy - Lex.
R. G. Tower

REC. ENG. DEC 2

File Adams Hazardous Waste

GRACE

Polyfibron Division

Industrial Chemicals Group
W.R. Grace & Co.
Harmony Street
Adams, Mass. 01220

(413) 743-0546

REC. E. G. JUN 8 1983

June 7, 1983

Mark Schleeweis
Division of Water Pollution Control
1 Draper Hall
University of Massachusetts
Amherst, Ma.

Re: Discharge into Hoosic River

Dear Mr. Schleeweis:

The following is a description of a discharge from this facility into the Hoosic River on Friday, June 3, 1983 and the action taken.

I. Description

While we were in the process of cleaning a sewer line from our settling pits to the storm drain system manhole, a discharge occurred into the river. When the pipe suddenly cleared, a large surge of water and contaminates flooded the manhole, causing an overflow into the river. The discharge occurred at approximately 1:55 P.M. and stopped at about 2:00 P.M.

II. Contamination

The material discharged was water contaminated by latex. The material was very dilute because it a) was wash down water, b) had an opportunity to settle, and c) it was highly diluted by cooling water and sewer water.

III. Quantity

The flow into the river was estimated at 2-3 GPM. The duration of the discharge was about 5 minutes.

For additional information, do not hesitate to contact me at (413)-743-0546.

Very truly yours,
W. R. GRACE & CO.

William J. Jolivet

William J. Jolivet
Plant Engineer

WJJ:sml

cc: A. T. Michaud
W. L. Turek
J. F. Murphy, Jr.

Commonwealth of Massachusetts

Department of Environmental Quality Engineering

Proposed

ANNUAL HAZARDOUS WASTE REPORT

This form must be used for submission of annual reports by generators of hazardous waste and facilities which treat, store, use, or dispose of hazardous waste that is generated at the facility site. You may request that any information, records, or particular part thereof be kept confidential and not considered to be public record when such information, record, or report relates to secret processes, methods of manufacture, or production and, if made public, would divulge a trade secret. Please refer to the specific instructions for generators or facilities before completing this form.

1. Type of report: Generator Annual Report

2. Reporting year: 1982

3. Installation's name and identification number:
W. R. Grace + Co. / Polyfibron Division MAD002081651

4. Installation address:
Harmony St, Adams, MA.

5. Installation Contact and telephone number:
Alan T. Michaud 413-743-0546

6. Transportation Services used (for Part 1A reports only):
CT- D012138969 NY-D046765514
NY- D088658646 MA-D053452637

7. Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

In addition, I understand that any material supplied with this application will not be considered confidential unless I have specifically requested that such material be kept confidential and the Department has made a determination of confidentiality in accordance with Part 12 of the regulations.

Lionel E. Roy — Print or type name

Lionel E. Roy — Authorized Signature

2/28/83 — Date signed

8. Generator's identification number: MADØØ2Ø816ET1

9. Facility's identification number: CTDØ12138969

10. Facility name: Environmental Waste Removal

11. Facility address (street or P.O. Box, city, state, & zip code):
130 Freight St, Waterbury, CT Ø61Ø2

12. Waste identification:

Line Number	A. Description of Waste	B DOT Hazard Class	C Hazardous Waste Number	D Amount of Waste
1	Waste Toluene (TOL)	Ø7	FØØ5	9,45Ø#
2	Waste Methyl Ethyl Ketone (MEK)	Ø7	FØØ5	9ØØ#
3	- Flammable Liquid NOS - rubber dissolved in TOL, MEK and/or 1-nitropropane (coating process)	Ø7	DØØ1	9,9ØØ#
4	- Flammable Liquid NOS - rubber dissolved in TOL, MEK, 1-2-dichloropropane and/or 1-nitropropane (coating process)	Ø7	DØØ1	5ØØ#
5				
6				
7				
8				

13. Comments (enter information by line number - see instructions):

none

8. Generator's identification number: MADØØ2Ø81651

9. Facility's identification number: OHDØ87433744

10. Facility name: CECOS / CER

11. Facility address (street or P.O. Box, city, state, & zip code):
5092 Aber Rd, Williamsburg, Ohio 45176

12. Waste identification:

Line Number	A. Description of Waste	B DOT Hazard Class	C Hazardous Waste Number	D Amount of Waste
1	Flammable Liquid NOS rubber dissolved in TOL, MEK + 1-nitropropane coating process	Ø1	DØØ1	9,965 #
2	Flammable Liquid NOS rubber dissolved in TOL coating process	Ø1	DØØ1	8,315 #
3	Flammable Solid NOS (Liquid ?) glass jars containing rubber dissolved in TOL, MEK, 1-nitropropane + 1-2 dichloropropane samples from coating process	(Ø1?) Ø8	DØØ1	3,500 #
~~4~~				
5	Flammable Liquid NOS rubber dissolved in 1-2-dichloropropane coating process	Ø1	DØØ1	6,500 #
6				
7				
8				

13. Comments (enter information by line number - see instructions):

3. The "Ø8" DOT hazard class is debatable. It was used because of the "solid" glass jars (which contained Flammable Liquids that had semi-solidified).

8. Generator's identification number: MADØØ2Ø81[illegible]

9. Facility's identification number: NYDØ8Ø336241

10. Facility name: CECOS Intl.

11. Facility address (street or P.O. Box, city, state, & zip code):
56th St. & Pine Avenue, Niagara Falls, NY 14303

12. Waste identification:

Line Number	A. Description of Waste	B DOT Hazard Class	C Hazardous Waste Number	D Amount of Waste
1	Waste Toluene (TOL)	Ø7	FØØ5	5,085#
2				
3				
4				
5				
6				
7				
8				

13. Comments (enter information by line number - see instructions):

none

8. Generator's identification number: MADØØ2Ø81(51

9. Facility's identification number: MDDØ74923392

10. Facility name: American Recovery

11. Facility address (street or P.O. Box, city, state, & zip code):
2Ø01 Benhill Ave, Baltimore, MD 21226

12. Waste identification:

Line Number	A. Description of Waste	B DOT Hazard Class	C Hazardous Waste Number	D Amount of Waste
1	Flammable Liquid NOS rubber dissolved in TOL, 1-nitropropane + MEK	Ø7	DØØ1	12,ØØØ #
2	Flammable Liquid NOS rubber dissolved in TOL	Ø7	DØØ1	4,4ØØ #
3	Flammable Liquid NOS rubber dissolved in TOL + 1-nitropropane	Ø7	DØØ1	3,6ØØ #
4	Flammable Liquid NOS PVC resin + rubber dissolved in isopropyl alcohol + TOL	Ø7	DØØ1	3,2ØØ #
5	Flammable Liquid NOS rubber dissolved in 1,2-dichloropropane, TOL, 1-nitropropane + MEK	Ø7	DØØ1	2,8ØØ #
6	Cement Liquid NOS cement containing ketone solvents	Ø7	DØØ1	1,6ØØ #
7	Flammable Liquid NOS rubber dissolved in TOL + MEK	Ø7	DØØ1	8ØØ #
8	Flammable Liquid NOS rubber dissolved in TOL + isopropyl alcohol	Ø7	DØØ1	8ØØ #
9	Flammable Solid NOS diesel fuel in absorbent	Ø8	MØØ1	4ØØ #

Comments (enter information by line number - see instructions):

1-8 wastes generated by coating processes

8. Generator's identification number: MADØØ2Ø816 1

9. Facility's identification number: MADØ534526 37

10. Facility name: Recycling Industries, Inc.

11. Facility address (street or P.O. Box, city, state, & zip code): 385 Quincy Ave, Braintree, MA Ø2184

cont. on next page

12. Waste identification:

Line Number	A. Description of Waste	B DOT Hazard Class	C Hazardous Waste Number	D Amount of Waste
1	Flammable Liquid NOS rubber dissolved in TOL	Ø1	DØØ1	945Ø #
2	Flammable Liquid NOS PVC resin + rubber dissolved in isopropyl alcohol + TOL	Ø1	DØØ1	495Ø #
3	Flammable Liquid NOS rubber dissolved in TOL + MEK	Ø1	DØØ1	45ØØ #
4	Flammable Liquid NOS rubber dissolved in TOL, 1-nitropropane + MEK	Ø1	DØØ1	45ØØ #
5	Flammable Liquid NOS rubber dissolved in TOL + isopropyl alcohol	Ø1	DØØ1	27ØØ #
6	Flammable Liquid NOS glass jars containing rubber dissolved in TOL, MEK, 1-nitropropane, 1-2-Dichloropropane + isopropyl alcohol	Ø1	DØØ1	27ØØ #
7	Flammable Liquid NOS MEK + isopropyl alcohol	Ø1	DØØ1	135Ø #
8	Cement Liquid NOS cement containing ketone solvents	Ø1	DØØ1	9ØØ #

Comments (enter information by line number - see instructions):

1-8 wastes generated by coating processes

(see next page for 9-11)

8. Generator's identification number:

9. Facility's identification number: (see previous page)

10. Facility name:

11. Facility address (street or P.O. Box, city, state, & zip code):

12. Waste identification:

Line Number	A. Description of Waste	B DOT Hazard Class	C Hazardous Waste Number	D Amount of Waste
X 9	Flammable Liquid NOS rubber dissolved in MEK, TOL + 1-2-dichloropropane	Ø7	DØØ1	9ØØ #
X 10	Flammable Liquid NOS rubber dissolved in TOL + turpentine	Ø7	DØØ1	45Ø #
X 11	Flammable Liquid NOS rubber dissolved in 1-2-dichloropropane, TOL, 1-nitropropane + MEK	Ø7	DØØ1	9ØØ #
4				
5				
6				
7				
8				

13. Comments (enter information by line number - see instructions):

9-11 wastes generated by coating processes

(see previous page for 1-8)

14. Waste identification:

Line Number	A. Description of Waste	B Hazardous Waste Number	C Handling Method	D Amount of Waste
1	Flammable Liquid NOS rubber dissolved in TOL, MEK + 1- nitropropane	DØØ1	SØ1	44,365 #
2	Flammable Liquid NOS rubber dissolved in TOL, MEK, 1-nitropropane + 1-2-dichloropropane	DØØ1	SØ1	4,200 #
3	Flammable Liquid NOS rubber dissolved in TOL	DØØ1	SØ1	22,225 #
4	Waste Toluene (TOL)	FØØ5	SØ1	14,535 #
5	Flammable Liquid NOS rubber + PVC resin dissolved in isopropyl alcohol + TOL	DØØ1	SØ1	8,150 #
6	Flammable Liquid NOS glass jars containing rubber dissolved in TOL, MEK, 1-nitropropane, 1-2 dichloropropane + isopropyl alcohol	DØØ1	SØ1	6,200 #
7	Flammable Liquid NOS rubber dissolved in 1-2-dichloropropane	DØØ1	SØ1	6,500 #
8	Flammable Liquid NOS rubber dissolved in TOL + MEK	DØØ1	SØ1	5,300 #

15. Comments (enter information by line number):

see next page for 9-16

16. Cost estimates for facilities:

Closure $ 10,000.00 Post-Closure $ not applicable

14. Waste identification:

Line Number	A. Description of Waste	B Hazardous Waste Number	C Handling Method	D Amount of Waste
9	Flammable Liquid NOS rubber dissolved in TOL + 1- nitropropane	DØØ1	SØ1	3,6ØØ #
10	Flammable Liquid NOS rubber dissolved in TOL + isopropyl alcohol	DØØ1	SØ1	3,5ØØ #
11	Cement Liquid NOS cement containing ketone solvents	DØØ1	SØ1	2,5ØØ #
12	Flammable Liquid NOS MEK + isopropyl alcohol	DØØ1	SØ1	1,35Ø #
13	Flammable Liquid NOS rubber dissolved in MEK, TOL + 1-2- dichloropropane	DØØ1	SØ1	9ØØ #
14	Waste methyl ethyl ketone (MEK)	FØØ5	SØ1	9ØØ #
15	Flammable Liquid NOS rubber dissolved in TOL + turpentine	DØØ1	SØ1	45Ø #
16	Flammable Solid NOS diesel fuel in absorbant	MØØ1	SØ1	4ØØ #

15. Comments (enter information by line number):

see previous page for

1-8

16. Cost estimates for facilities:

Closure $ 10,000.00 Post-Closure $ not applicable

NOV 1 8 1983

14 OCT 1983

CERTIFIED MAIL -
RETURN RECEIPT REQUESTED

Mark Stoler, Esq.
Assistant Counsel
W.R. Grace & Co.
62 Whittemore Avenue
Cambridge, MA 02140

Re: Silresim Chemical Corporation Hazardous Waste Facility
in Lowell, Massachusetts

Dear Sir or Madam:

Enclosed with this letter are copies of records relied upon by the Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Quality Engineering (DEQE) in identifying the company named above as a potentially responsible party with respect to the Silresim Chemical Corporation site in Lowell, Massachusetts. The enclosed records consist of all documents used by EPA, its contractor, NUS, Incorporated, and DEQE, in estimating the company's total volume of shipments to the site, and in compiling the Silresim Generator Ranking distributed at the September 21, 1983 meeting in New England Life Hall. Also included are any records which indicate the volume of shipments sent to the company from the site. Documents submitted by the company in response to the EPA and DEQE information requests which accompanied the notice letters issued in August and September are not included among the enclosed records.

The enclosed documents are being released to you for the sole purpose of furthering the negotiations currently under way with respect to the Silresim site. Documents are only being released to those companies which have complied with the EPA and DEQE information requests.

Please be advised that EPA and DEQE have determined that the enclosed records are investigatory records, compiled for law enforcement purposes, the release of which may interfere with enforcement proceedings. As such, the records are exempt from mandatory disclosure under the investigatory records exemption of the Freedom of

Information Act, 5 U.S.C. sec. 552(b)(7), and under the comparable provisions of state law, M.G.L. c.4, sec. 7. Nevertheless, a limited disclosure of these records is being made in order to further the settlement negotiations and to encourage communication among the parties. These records are being provided as a discretionary release of information and they should not be disclosed further or made publicly available in any context prior to approval by EPA and DEQE.

These records are being provided with the understanding that the information requests made by EPA and DEQE in the notice letters issued in August and September are applicable to any documents or information describing the company's involvement with the Silresim site that the company discovers as a result of receiving the enclosed records. Therefore, we request that you forward any such documents and information to EPA as a further response to the EPA and DEQE information requests.

Sincerely yours,

E. Michael Thomas
Office of Regional Counsel
Environmental Protection Agency
JFK Federal Building Room 2203
Boston, MA 02203

Lee Breckenridge
Assistant Attorney General
Commonwealth of Massachusetts
One Ashburton Place
Boston, MA 02108

(55-55 GAL. DRUMS) (MIBK'S G-RERUN

W. R. GRACE ANALYSES Dec. 11, 1923

55 gals. W.R. 1	98% + MIBK	DARK
" 2	97.5% MIBK	"
" 3	56% ~~Toluene~~ + 4.3% 1,1,1.	
" 4	Two layers. ① Bottom water ② Top white thick	
" 5	2.6% MIBK + 95.5% TOLUENE	
" 6	~~67.5% TRT~~ 91% TOLUENE	
" 7	Too Thick To inject.	
" 8	8 ~~6% MIBK TRT~~ 93% TOLUENE	
" 9	Too thick to inject.	
" 10	92% TOLUENE	
" 11	SOLIDS - TOO THICK	
" 12	98% TOLUENE	
" 13	SOLIDS - TOO THICK	
" 14	" " "	
" 15	95% TOLUENE	
" 16	SOLIDS + 95% TOLUENE	
" 17	99% TOLUENE	
" 18	SOLIDS - TRASH, WASTE CANS ETC.	
" 19	98% TOLUENE	
" 20	98% TOLUENE	
" 21	3% MIBK + 97% TOLUENE	
" 22	99% TOLUENE	
" 23	5% TOLUENE — THICK	
" 24	99% TOLUENE	
" 25	TOO THICK	
" 26	99% TOLUENE	
" 27	3% MIBK + 97% TOLUENE	
" 28	3% MIBK + 97% TOLUENE	
" 29	2% MIBK + 88% TOLUENE	
" 30	2% MIBK + 89% TOLUENE	
" 31	91% TOLUENE	
" 32	95% MIBK + 4% TOLUENE	
" 33	97% MIBK + 2% TOLUENE	

2/14	
2/14	
2/14	
2/14	
2/17	
2/17	
19	
19	
19	
19	
19	
19	
19	
19	

Invoice #	Company Name	Amount
1847	S.C.I. Ind.	126
1848	Painting Specialists	81
1849	Digital Equip Corp.	234
1850	Azco Chemical	50
1851	Azco Chemical	50
1852	Service Chemical Corp.	1275
853	W.R. Grace + Co.	743
354	Digital Eq. p. Corp.	154
855	[illegible]	[illegible]
856	Advance Coatings Co.	264
357	New England Nuclear	100
358	Azco Chemical Co.	62
359	Electro Circuits Inc.	55
360	American Can Co.	54
361	S.C.I	1400
362	SCI	6300
363	Hampden Location [illegible]	[illegible]
364	Advance Coatings Corp.	385
365	American Can Co.	634
366	Arco Inc.	495
367	Arco Inc.	436
368	Raytheon, Comm II	8
369	Square Electric	199
370	[illegible]	

72-55 gal. drums

W.R. Grace Analysis — July 24, 1979

55 gal	
"	
"	
WR34	84% Tol
WR35	82% Tol + 1% MEK + 0.8% Ace
WR36	76% Tol + 1% MEK + 1% Ace
WR37	Solid Waste
WR38	Solid Waste
WR39	81% MIBK + 7% Tol + 1% MEK [redacted] + 3% MEK
WR40	84% Tol + 6.5% MEK
WR41	68% Tol + 31% MEK
WR42	0.5% Ace + 55% MIBK
WR43	81% Tol + 7% Ace + 3% MEK
WR44	88% Tol
WR45	[redacted] No Sample
WR46	[redacted] Solid MATERIAL
WR47	93% Tol
WR48	1% Ace + 10% MEK + 78% Tol
WR49	2% MEK + 7% MIBK + 90% Tol
WR50	1% MEK + 97% Tol
WR51	98% Tol
WR52	13% Ace + 83% Tol
WR53	41.4% MEK + 55% Tol
WR54	96% Tol + 4% MEK
WR55	70% Tol
WR56	3% Ace + 2% MEK + 4% MIBK + 88% Tol
WR57	[redacted] 97% Tol
WR58	[redacted] 4% Ace + 1% MEK + 59% Tol
WR59	[redacted] 95% Tol
WRG0	[redacted] 3% MEK + 97% Tol
WRG1	55% MIBK + 19% Tol
WRG2	Waste Water [redacted]
WRG3	SOLID MATERIAL
WRG4	SOLID MATERIAL
WRG5	SOLID MATERIAL
WRG6	2% MEK + 98% Tol
WRG7	1% MEK + 76% Tol

WR68 SOLID MATERIAL ✓
WR69 93% TOL
WR70 3 top: 1% XYL + 13% MEK + 5% MIBK + 66% TOL 1/3 Bot! Water
WR71 33% TOL
WR72 SOLID MATERIAL
WR73 90% TOL
WR74 1% MEK + 81% TOL
WR75 5% Ace + 9% MIBK + 83% TOL
WR76 96% TOL
WR77 43% TOL
WR78 44% TOL
WR79 ~~Too thick to ANALYZE~~
WR80 Waste Water
WR81 Waste Water
WR82 SOLID MATERIAL
WR83 6% MEK + 20% MIBK + 73% TOL
WR84 SOLID MATERIAL
WR85 SOLID MATERIAL
WR86 90% TOL
WR87 29% MEK + 73% TOL
WR88 55% TOL
WR89 3% Ace + 41% MEK + 48% TOL
WR90 1% MEK + 95% TOL
WR91 1% Ace ~~+ 1% MEK + 90%~~ TOL
WR92 15% Ace + 3% MEK + 49% TOL
WR93 2% MEK + 97% TOL
WR94 SOLID MATERIAL ✓
WR95 1% Ace + 1% MEK + 96% TOL
WR96 7% MEK + 20% TOL
WR97 24% TOL
WR98 93% TOL
WR99 7% MIBK + 20% TOL
WR100 1% MIBK + 93% TOL
WR101 1% Ace + 79% TOL

WR 102	42% MIBK + 57% TOL
WR 103	67% MEK + 20% TOL
WR 104	1% MEK + 94% TOL
WR 105	95% TOL

8/26/83 JFM

Adams

Use of Silresim Chem Corp. 1974

David Burge — Made out forms for Echarat. Committee Report.

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

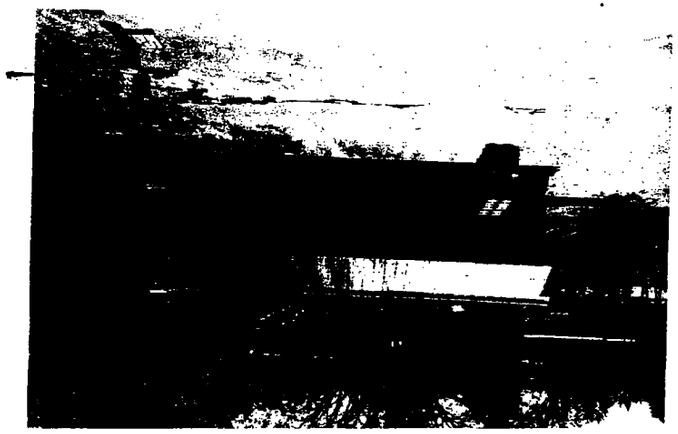
This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ • MAD002081651

GRACE W R & CO INC
HARMONY ST
ADAMS MA 01220

INSTALLATION ADDRESS ➤ HARMONY ST
ADAMS MA 01220

EPA Form 8700-12B (4-80) 11/14/80



UNITED STATES POSTAL SERVICE
OFFICIAL BUSINESS

SENDER INSTRUCTIONS
Print your name, address, and ZIP Code in the space below.
- Complete items 1, 2, 3, and 4 on the reverse.
- Attach to front of article if space permits, otherwise affix to back of article.
- Endorse article "Return Receipt Requested" adjacent to number.

PENALTY FOR PRIVATE USE TO AVOID PAYMENT OF POSTAGE, $300

U.S.MAIL

RETURN TO

US EPA, Waste Mgmnt Div
(Name of Sender)

JFK Fed Bldg, Rm 1903
(Street or P.O. Box)

Boston, MA 02203
(City, State, and ZIP Code)

ATTN: JACOB EDWARDS - RETURN DARFA

PS Form 3811, Dec. 1990 — RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: Complete items 1, 2, 3, and 4. Add your address in the "RETURN TO" space on reverse.

(CONSULT POSTMASTER FOR FEES)

1. The following service is requested (check one).
☐ Show to whom and date delivered ..... —¢
☐ Show to whom, date, and address of delivery .. —¢
2. ☐ RESTRICTED DELIVERY —¢
(The restricted delivery fee is charged in addition to the return receipt fee.)

TOTAL $ —

3. ARTICLE ADDRESSED TO: MADOO 208/651
W.R. GRACE & Co
55 HAYDEN Ave
Lexington, MA 02173

4. TYPE OF SERVICE: ☐ REGISTERED ☐ INSURED ☐ CERTIFIED ☐ COD ☐ EXPRESS MAIL
ARTICLE NUMBER

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☒ Addressee ☐ Authorized agent

5. DATE OF DELIVERY 3 Sept
POSTMARK

6. ADDRESSEE'S ADDRESS (Only if requested)

7. UNABLE TO DELIVER BECAUSE:

7a. EMPLOYEE'S INITIALS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
J. F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

3/26/84

REC ENG MAR 30 1984

Gary W. Siegel, Environmental Engineer
W.R. Grace & Company
55 Hayden Avenue
Lexington, MA 02173

Re: EPA I.D. Number MAD002081651

Dear Mr. Siegel:

This letter is in response to your letter of December 14, 1983 requesting the return of your Part A application for your company's Adams facility. From the information provided, it appears that the facility located at Harmony Steet, Adams Massachusetts, does not require a RCRA permit under Section 3005 of the Act and 40 CFR 270.1(b) (formerly 40 CFR Part 122.21(c)). This section requires owners and/or operators of hazardous waste treatment, storage, and disposal facilities to obtain a permit for these activities. A facility that does not and will not treat, store, or dispose of hazardous waste does not require a RCRA permit.

EPA is returning the Part A permit application for the Adams facility and has changed the company's status to a generator of hazardous waste. Under 40 CFR Part 270.1(c)(2) (formerly 40 CFR Part 122.21(a)(2)), a generator of hazardous waste is allowed to accumulate hazardous waste on site for up to 90 days in accordance with 40 CFR Part 262.34 without a RCRA permit.

If EPA's interpretation is incorrect, or if the facility is in fact one which is required to have a permit under Section 3005, a complete RCRA Part A application (EPA Forms 3510-1 and 3510-3) must be completed and resubmitted to this office by 4/30/84. If hazardous waste is treated, stored, or disposed of at the facility referenced above and the applicant fails or refuses to notify EPA by the date stated above, appropriate enforcement action may be taken.

If you have any questions, please contact Jacob Edwards at (617) 223-1923. All replies should be addressed to:

U.S Environmental Protection Agency
State Waste Programs Branch
JFK Federal Building, Room 1903
Boston, MA 02203

Sincerely,

Dennis A. Huebner, Chief
State Waste Programs Branch

cc: Nancy Wrenn
DEQE, DHW

Please print or type in the unshaded areas only (fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F MAD002081651

LABEL ITEMS

I. EPA I.D. NUMBER

MAD002081651

III. FACILITY NAME

GRACE W R & CO INC

V. FACILITY MAILING ADDRESS

HARMONY ST

ADAMS MA 01220

VI. FACILITY LOCATION

HARMONY ST

ADAMS MA 01220

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete Items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED	SPECIFIC QUESTIONS	YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X			D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 W. R. GRACE & CO.

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
MURPHY, EDWARD T. PLANT MANAGER	413 743 0546

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

HARMONY STREET

B. CITY OR TOWN	C. STATE	D. ZIP CODE
ADAMS	MA	01220

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

HARMONY STREET

B. COUNTY NAME

BERKSHIRE

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
ADAMS	MA	01220	

Please print or type in the unshaded areas only (fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

F M A D 0 0 2 0 8 1 6 5 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

[ ] 2. NEW FACILITY *(Complete item below.)*

C	YR.	MO.	DAY
8	73	06	01

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

YR.	MO.	DAY

FOR NEW FACILITIES PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS N.A.

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE — Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C)*.

B. PROCESS DESIGN CAPACITY — For each code entered in column A enter the capacity of the process.
1. AMOUNT — Enter the amount.
2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below)*: A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

C		T/A	C
C	DUP		1

LINE NUMBER	A. PROCESS CODE (from list above)	B.1. AMOUNT (specify)	B.2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B.1. AMOUNT	B.2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	11,000	G		7				
2					8				
3					9				
4					10				

Continued from page 2.
NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)														FOR OFFICIAL USE ONLY					
W	M	A	D	0	0	2	0	8	1	6	5	1	T/A	C	W	DUP	T/A	C	DUP
														1				2	

IV. DESCRIPTION OF HAZARDOUS WASTES *(continued)*

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)				D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
1	F005	160,000	P	S01				
2	U220	100	P	S01				
3	U107	100	P	S01				
4	U154	100	P	S01				
5	U159	100	P	S01				
6	U226	100	P	S01				
7	D001							Included with above
8								
9								
10								
11								
12								
13								
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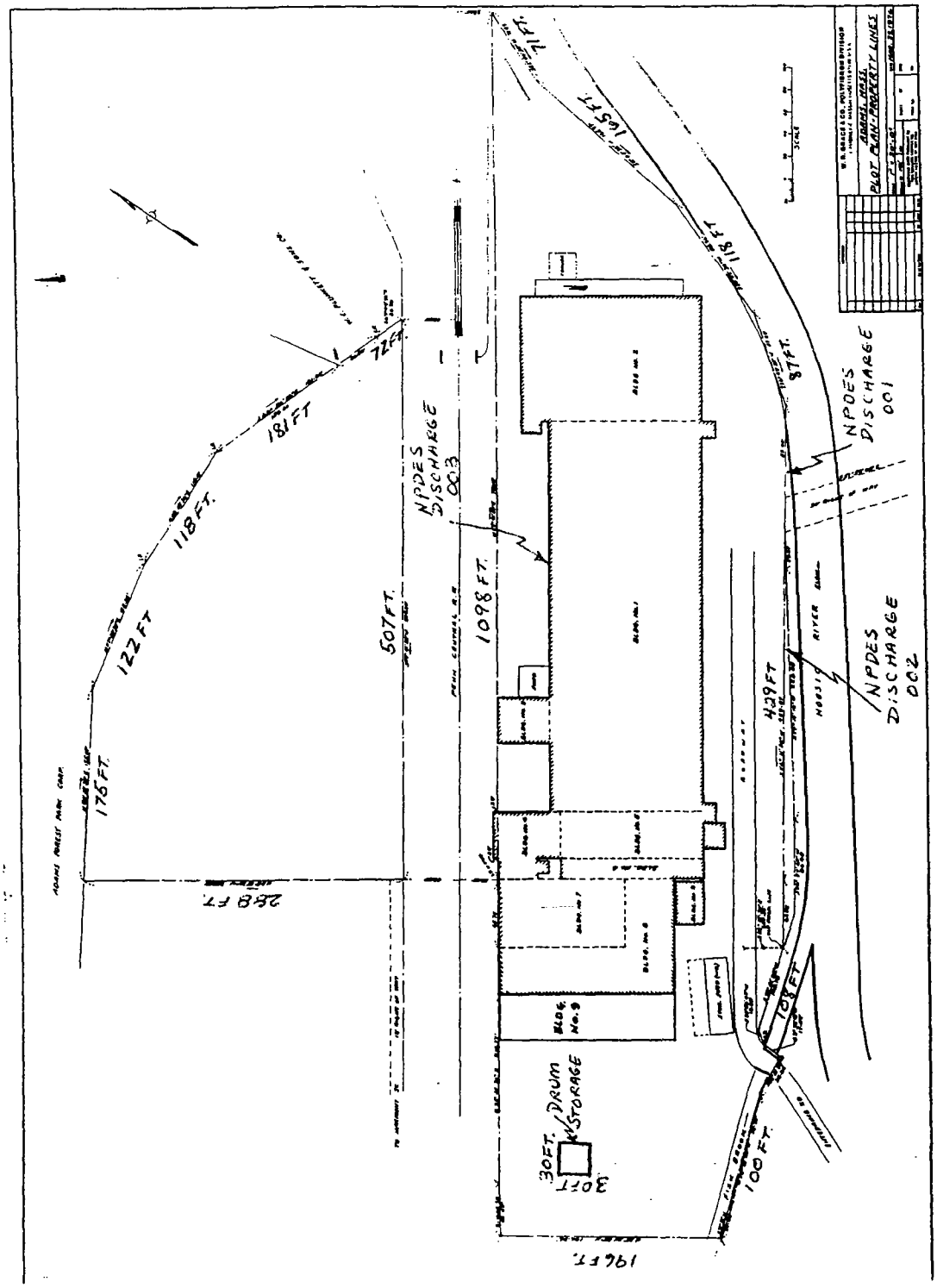
26								

Form Approved OMB No. 158-S80004

V. FACILITY DRAWING *(see page 4)*



Bok I 242
Adams MA

TO: A. G. Nagy - Adams

DATE: August 7, 1985

FROM: G. W. Siegel

SUBJECT: Revised Contingency Plan

CC: A. T. Michaud - Adams
J. F. Murphy, Jr.

Attached for your review and comment is a copy of a revised Hazardous Waste Contingency Plan for Adams. Please check it for accuracy and completeness. If the Plan is satisfactory, you should make arrangements to meet with the local emergency contacts listed in the Plan in order to give them a copy and to briefly explain its contents.

Let me know if you have any questions.

G. W. Siegel

Attachment

HAZARDOUS WASTE CONTINGENCY PLAN
W. R. GRACE & CO.
ADAMS, MASSACHUSETTS

EPA I.D. #MAD002081651 Latest Revision: August 7, 1985

General Information

This contingency plan is for the W. R. Grace & Co. facility located at Harmony Street, Adams, Massachusetts 01220. This facility manufactures printing blankets by coating fabric with a rubber/solvent coating material by means of knife-over-roll coating, pressure laminating and pressure vulcanization. The primary solvent used is toluene.

Grace accumulates most of its hazardous waste on a 75' X 75' (size of waste area is approximate) fenced storage pad located outside the plant (see Figure #1). The waste generated in all cases consists of rubber in solvent, rubber latex emulsions and solids. The waste drums are filled at the process equipment where the waste is generated. The drums are not moved to the outside pad until they are full and sealed with a cover and compatible gasket.

The waste consists of solvent based coatings in one form or another. Some of it is "batch ends" which is too old to use. Some of the waste is the material that remains on the equipment at the end of a coating run. The last type of waste handled is the solvent used to clean pipe lines and mixing equipment.

All waste drums are disposed of off-site by Clean Harbors, Inc. of Braintree, Massachusetts.

Emergency Coordinator

If an emergency situation develops at the facility, the discoverer should immediately contact one of the Emergency Coordinators listed below.

Primary Emergency Coordinator

Name:	Allan T. Michaud 53 Candlewood Drive Williamstown, Massachusetts 01267
Home Telephone:	413-458-4412
Office Telephone:	413-743-0546, Ext. 26
Office Hours:	8:00 a.m. to 5:00 p.m.

Alternate Emergency Coordinator

Name:	Alexander W. Nagy 709 Simonds Road Williamstown, Massachusetts 01267

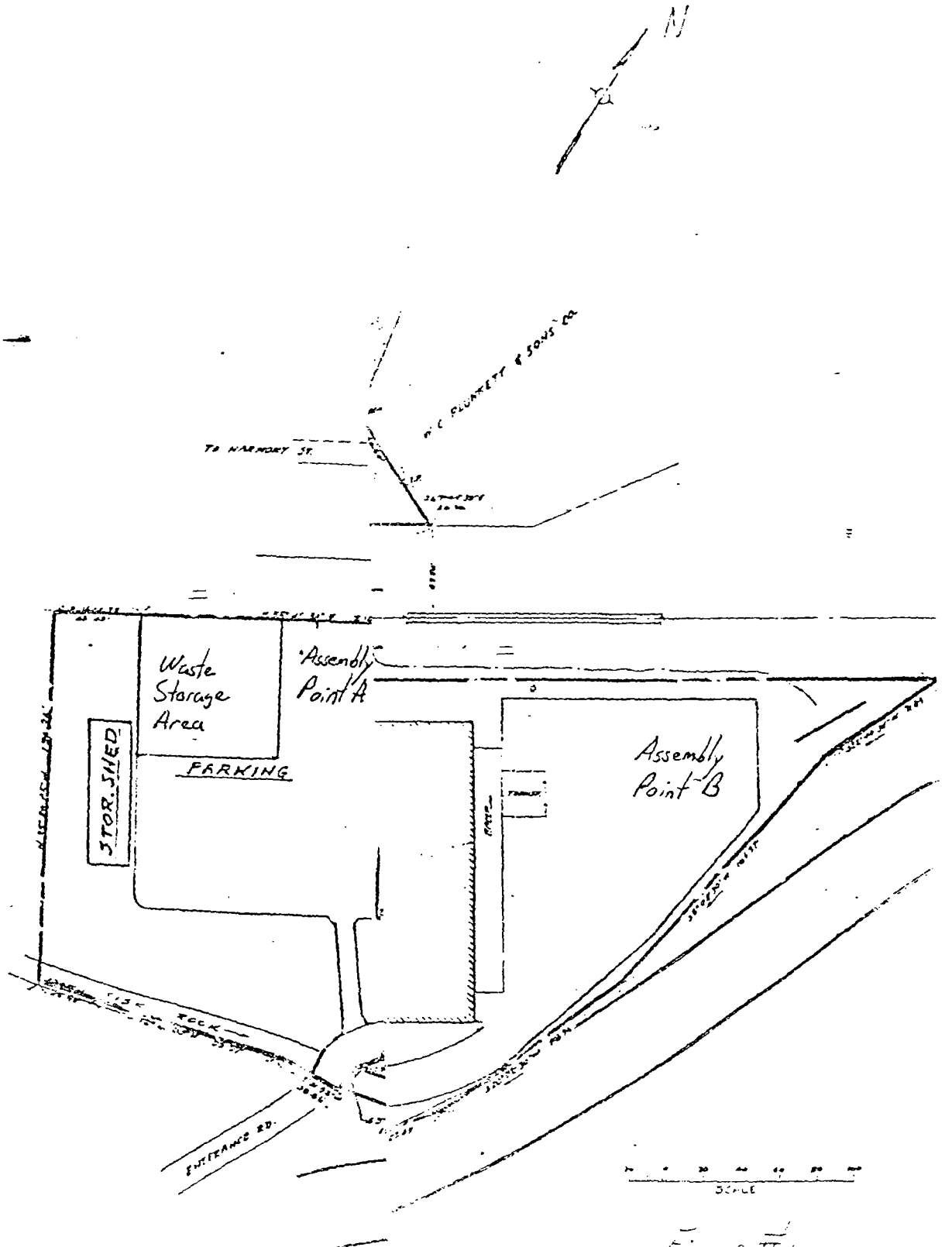


Figure 1

M.R.C. ICE & CO. POLYFIBRON DIVISION

PLOT PLAN-PROPERTY LINES

Home Telephone:	413-458-5456
Office Telephone:	413-743-0546, Ext. 32
Office Hours:	8:00 a.m. to 5:00 p.m.

Alternate Emergency Coordinator

Name:	Gerald C. Lord
	10 Depot Street
	Adams, Massachusetts 01220
Home Telephone:	413-743-4541
Office Telephone:	413-743-0546, Ext. 43
Office Hours:	3:00 p.m. to 11:00 p.m. (2nd Shift)

The Primary Emergency Coordinator and Alternates have complete authority to commit all resources of the plant in the event of an emergency.

Implementation of the Contingency Plan

The decision to implement the Contingency Plan depends upon whether or not an imminent or actual incident could threaten human health or the environment. The purpose of this section is to provide guidance to the Emergency Coordinator by providing decision-making criteria.

The Contingency Plan will be implemented in the following situations:

1. Fire and/or Explosion

   a. A fire causes the release of toxic fumes.

   b. The fire spreads and could possibly ignite materials at other locations on-site, or could cause heat-induced explosions.

   c. The fire could possibly spread to off-site areas.

   d. Use of water or water and chemical fire suppressant could result in contaminated run-off.

   e. An imminent danger exists that an explosion could occur, causing a safety hazard because of flying fragments or shock waves.

   f. An imminent danger exists that an explosion could ignite other hazardous waste at the facility.

   g. An imminent danger exists that an explosion could result in release of toxic material.

   h. An explosion has occurred.

2. Spills or Material Release

   a. The spill could result in release of flammable liquids or vapors, thus causing a fire or gas explosion hazard.

   b. The spill could cause the release of toxic liquids or fumes.

   c. The spill can be contained on-site, but the potential exists for groundwater contamination.

   d. The spill cannot be contained on-site, resulting in off-site soil contamination and/or ground or surface water pollution.

Emergency Response and Alarm Procedures

When an employee discovers an emergency condition in a situation which could be safely handled by the individual, corrective action should be taken at once. Such actions would consist of containing a small spill or putting out a small fire with an extinguisher. The Emergency Coordinator should then be notified of the condition and action taken. In the event of an explosion, any employee should activate the plant's alarm system, perform the operations below, if feasible, and evacuate the building as soon as possible. In the event of a fire beyond the control of the immediate personnel, the Emergency Coordinator should be immediately notified and then, at his discretion, the plant alarm system should be activated. Activation of the alarm system will not immediately notify the Fire Department. Therefore, the Fire Department should be telephoned or the alarm sounded outside the compound (upper FIA) room.

In general, the implementation of the Contingency Plan will follow the outline shown in Figure #2. For small fires, the Fire Department will be called if assistance is needed or the potential for additional hazards exist. The Police Department will be notified if off-site assistance is required. In the event of a chemical spill, the alarm system will not be activated unless the spill catches fire. The Emergency Coordinator may contact the Fire Department if he feels that the spill or fumes from the spill present a fire and/or explosion hazard. Appropriate State, local and Federal authorities will be notified as required by law, after initial containment or control actions are in place. If there have been any injuries, the local hospital will be notified. A list of emergency contacts is listed in Table I.

Control Procedures -- Fire and/or Explosion

The drum accumulation area can be easily accessed by fire fighting equipment and other emergency vehicles.

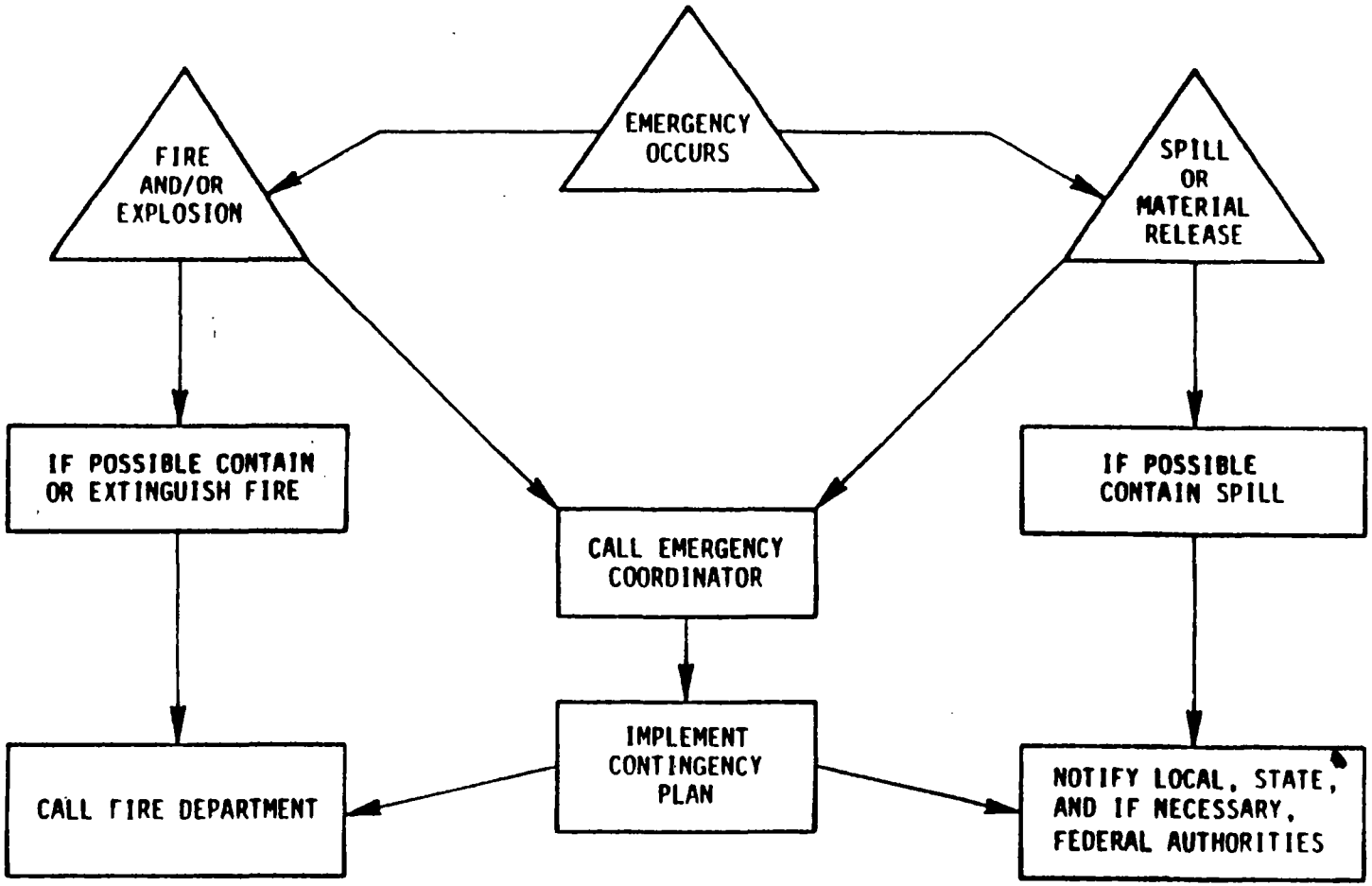


Figure 2 Overview of emergency plan of action.

The following actions will be taken in the areas affected by the fire or explosion in order to prevent it from spreading to other areas of the plant.

1. Fire doors will be closed.

2. Hazardous work in all areas will be shut down immediately.

3. All feed lines and additional equipment will be shut down, as necessary and practical.

4. The Emergency Coordinator will be contacted.

5. The area will be cleared of all personnel not actively involved in fighting the fire. These persons are to report to the designated assembling areas for accountability.

6. All injured persons will be removed, and medical treatment will be administered by qualified personnel.

Plant evacuation will be necessary in the case of a major fire or explosion. Specifics are outlined under general evacuation procedures. All personnel have been trained in evacuation procedures and means of exit from their respective work areas.

Until evacuation is signaled, personnel who are not in the affected area will stay in their respective work areas. Supervisors of unaffected areas will stay with their personnel and be ready to evacuate and account for the persons under their supervision.

The Adams Fire Chief will be in charge of any fire fighting effort for which the Fire Department is called in to assist with. An "all clear" signal will be given when the fire has been extinguished and the safety of personnel is no longer endangered. The Fire Chief will determine when the emergency has passed and consult with the Emergency Coordinator before the "all clear" signal is given. All plant emergency equipment used in the emergency must be cleaned and fit for use prior to resumption of plant operation in affected areas.

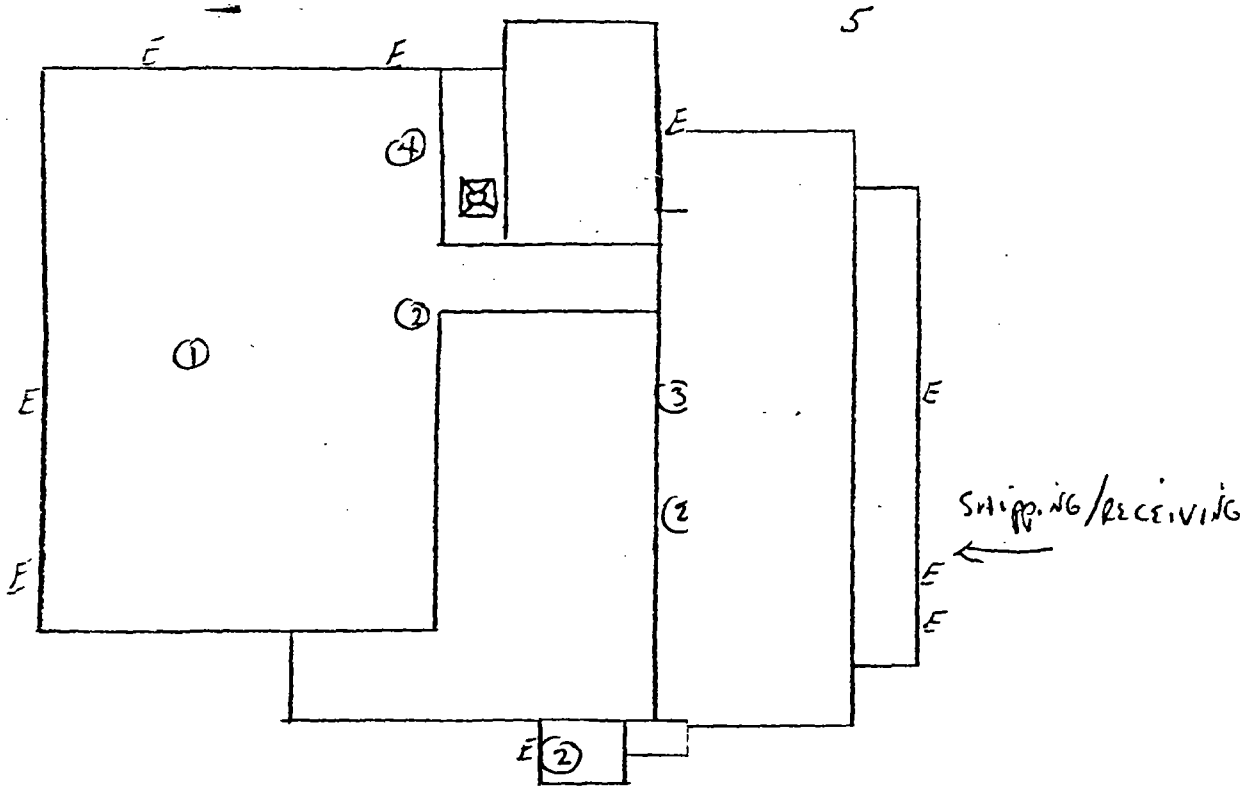
Control Procedures -- Spills

In the event of an emergency involving a chemical spill, the following general procedures will be used for rapid and safe response and control of the situation.

If the employee discovers a chemical spill, he or she will immediately report it to the Emergency Coordinator. If it is safe, the employee will then attempt to contain the spill or begin cleanup by using the absorbent material stored in designated locations throughout the plant. When he arrives at the spill site, the Emergency Coordinator will obtain information pertaining to the following:

Σm.
(1
(2
(3
(4
(5
Σ

5



5

W.R. Grace
Adams, Massac.
Figure #3

1. The material spilled.
2. Location of the spill.
3. An estimate of the amount spilled and/or the rate of continued release.
4. Where the spill is heading.
5. Any injuries involved.
6. Potential for fire and/or explosion.

This information will help the Emergency Coordinator to assess the magnitude and potential seriousness of the spill. It is expected that most spill situations will be directed by the Emergency Coordinator and handled by plant personnel. The Emergency Coordinator will contact and deploy the necessary in-plant personnel. The initial work will be to contain the spill using the absorbent material stored in the plant. If the spill is outside, dirt can be shoveled into dikes to prevent spreading. If the accident is beyond plant capabilities, the Emergency Coordinator will contact the appropriate agencies listed in Table I for proper assistance. The primary response to any emergency will be to protect human health and safety. Containment, identification, treatment and disposal assessment will be the secondary response.

All spilled material and contaminated material will be collected and placed in empty drums located on-site. The drums will be properly labeled and placed on the hazardous waste accumulation area outside. Disposal will be handled by SCA Chemical Service as is the plant's normal hazardous waste.

Evacuation Plan

The Emergency Coordinator is responsible for determining which emergency situations require plant evacuation. The page system in the plant will be used to initiate evacuation. The employees will be told to evacuate through the nearest available exit and assemble at the far side of the two parking lots (Assembly Points "A" and "B") for accountability of all plant personnel. Whenever the fire alarm is activated, employees will secure their stations, if feasible, evacuate through the nearest exit, and assemble at Assembly Points "A" and "B".

Emergency Equipment

Location of emergency equipment is shown on Figure 3 except for the plant's fire extinguishers which are listed by location in Table II. The following emergency equipment is available at the facility.

1. Fire extinguishers (chemical)
2. Fire hydrants
3. Air packs
4. Communication system (telephones)
5. Alarm system
6. Emergency lighting
7. First aid equipment
8. Eyewash stations
9. Automatic sprinkler system

Coordination Agreements

Grace has an active arrangement with the Adams Fire Department. The Fire Chief makes tours of the plant where he is informed of the materials used and potential emergencies that could arise which would require outside assistance. The Fire Department also holds training sessions in the plant where the employees are instructed in the use of the plant's emergency equipment and emergency procedures.

The following organizations have been sent copies of the Contingency Plan:

Adams Fire Department
Adams Police Department
North Adams Hospital
Adams Board of Health

Equipment Cleaning, Maintenance and Restocking

Immediately after emergency actions are completed, the Emergency Coordinator will direct the clean up of any reusable equipment until it is returned to its original state. The Emergency Coordinator will make a list of materials expended during the response (i.e., extinguishers, spill pillows, drums, etc.) and direct that all materials on the list be recharged or restocked. The Emergency Coordinator will follow up on his direction within 15 days of the incident. Any deficiencies will be immediately corrected.

Required Reports

As required by 310 CMR 30.524(F), any emergency event that requires implementing the Contingency Plan, will be reported to the Commissioner of the Department of Environmental Quality Engineering within 15 days after the incident. The report will include:

1. Name, address and telephone number of the owner or operator.
2. Name, address and telephone number of the facility.
3. Date, time and type of incident (e.g., fire, explosion).
4. Name and quantity of material(s) involved.
5. The extent of injuries, if any.
6. An assessment of actual or potential hazards to public health or the environment, where this is applicable.
7. Estimated quantity and disposition of recovered material that resulted from the incident.

Amendments to the Contingency Plan

The Contingency Plan will be reviewed and immediately ammended, if necessary, whenever:

1. The facility permit is revised.
2. The plan fails in an emergency.
3. The facility changes in its design, construction, operation, maintenance or other circumstances in a way that materially increases the potential for fires, explosions or release of hazardous waste or hazardous waste constituents, or changes in the response necessary in any emergency.
4. The list of emergency coordinators change.
5. The list of emergency equipment changes.

GWS/mlr/13
8/7/85

TABLE I
EMERGENCY CONTACTS

1)	North Adams Regional Hospital (Emergency Room and General Information)	413-663-3701
2)	Adams Ambulance Service	413-743-5656
3)	Adams Fire Department	413-743-2323
4)	North Adams Fire Department (Back-up)	413-664-4922
5)	Adams Police Department	413-743-1212
6)	DEQE Western Regional Office Weekends and Nights:	413-785-5327 617-566-4500
7)	CHEMTREC	1-800-424-9300
8)	National Response Center	1-800-424-8802

NOTE: FOR POLICE, FIRE OR AMBULANCE, DIAL 0

G. W. Siegel/13
8/7/85

TABLE II
W. R. GRACE

FIRE EXTINGUISHER DATA

YEAR OF PURCHASE	YEAR PRES. TEST	SERIAL NO.	TYPE	SIZE	LOCATION	OU NO
1970	1983	AE291851	ABC	20	West end of North wall-Spreader area by Men's rest room	1
1977	1983	M74546	ABC	20	West side Spreader area-West of Men's rest room	2
1970	1983	AC431239	ABC	20	West end of North wall-No. 1 Spreader	3
1970	1983	AC431384	ABC	20	South wall of No. 1 Spreader-center of wall	4
1974	1983	AX371993	ABC	20	South wall of No. 1 Spreader-East end of wall	5
;970	1983	AE975794	ABC	20	North wall of No. 1 Spreader-West end of wall	6
1974	1983	AX374487	ABC	20	East end of Carcass Coater	7
1974	1983	AX371867	ABC	20	West end of Carcass Coater	8
1974	1983	AX371992	ABC	20	South wall of Carcass Coater	9
1974	1983	AX374976	ABC	20	South end of No. 6 Rotocure, East wall	10
1972	1983	AN361650	ABC	20	Between No. 4 & No. 6 Rotocure, East wall	11
1972	1983	AS476218	ABC	20	East wall of Spreader Room at entrance to office	12
1974	1983	AX372368	ABC	20	Northeast wall of No. 4 Rotocure oven	13
1981		ED342530	ABC	20	East wall of entrance of boiler room	14
1979		CZ336645	ABC	20	Northwest wall of overhead door in boiler room	15
1977	1983	T370031	ABC	20	South wall, East of compressor in boiler room	16
1977	1983	N685566	ABC	20	North wall, East side of inside overhead door	17
1981		DY775131	ABC	20	Inside of drum storage area, near gate, outside	18
1969	1983	Z411314	ABC	20	Oil storage room entrance, North side	19
1979		CZ316658	ABC	20	North column, West side of Canline	20
1963	1983	H666518	ABC	20	North end of Canline, under catwalk	21
1979		CZ336650	ABC	20	West wall, West of Canline	22
1977	1983	J456647	ABC	20	No. 2 Track and Trim, column of Jib Craine	23
1977	1983	687101	ABC	20	Emergency exit, downstairs computer room	24
1981		DW310130	ABC	20	East wall, at entrance of telephone control room	25
1972	1983	956516	ABC	20	South end, West wall of Lab door	26
1972	1983	AN961624	ABC	20	East wall, near stairs to North end of No. 1 P.B. Room	27
						28
1977	1983	H727351	ABC	20	Northeast wall, White Room	29
1977	1983	P596639	ABC	20	North end of center aisle of White Room	30

YEAR OF PURCHASE	YEAR PRES. TEST	SERIAL NO.	TYPE	SIZE	LOCATION	OUR NO.
1968	1983	W149398	ABC	20	South end of White Room near Exit door	31
1975	1983	BJ624723	ABC	20	Outside of White Room, East wall, near office	32
1979		CZ316651	ABC	20	Column, main floor, Southeast of T & T	33
1979		CZ336647	ABC	20	Southeast wall, near extinguisher canisters of White Room, main floor	34
						35
1970	1983	AC428068	ABC	20	No. 1, Track & Trim, on column	36
1977	1983	H666520	ABC	20	Southwest of storage cabinet, No. 3 P.B. Coater	37
1978	1983	AX314235	ABC	20	No. 3 P.B. Coater, East side of bridge	38
1977	1983	N687697	ABC	20	South side of Upsey-Daisy room entrance	39
1979		CZ336640	ABC	20	Southeast wall, Upsy-Daisy room	40
1973	1983	AS472553	ABC	20	North wall, Upsy-Daisy room	41
1975	1983	BJ628591	ABC	20	South wall, near rubber mill	42
1967	1983	T370188	ABC	20	North wall of entrance of rubber storage room	43
1977	1983	M74530	ABC	20	Right side of entrance in mixing storage room	44
1972	1983	AS476059	ABC	20	Entrance to drum storage room	45
1968	1983	W353278	ABC	20	Top of loading platform, drum storage room	46
1977	1983	CD120864	ABC	20	White Room, between No. 2 Inline and No. 1 Backcoater	47
	1983	370064	ABC	20	Upper F.I.A. room-top of stairs of loading platform	48
1974	1983	373738	ABC	20	Upper F.I.A. room-near overhead door	49
1972	1983	472556	ABC	20	Compound Room, mezzanine, South wall, East end	50
1964	1983	80529	ABC	10	South wall, West end, Compound room	51
1968	1983	149592	ABC	20	Southwest wall, No. 2 P.B. room storage area	52
1979		CZ314898	ABC	20	West aisle, South end, carpenter shop, basement	53
1981		DW310126	ABC	10	West aisle, North end Basement	54
1967	1983	T370192	ABC	20	Center aisle, North end, basement	55
1981		DY731279	ABC	10	Center aisle, South end, basement	56
1981		DW330885	ABC	10	East aisle, South end, basement	57
1981		DY731090	ABC	10	East aisle, North end, basement	58
1972	1983	961494	ABC	10	Center West wall, No. 1 Blanket Room	59
1977	1983	405895	CO^2	5	South end, East wall, No. 1 Blanket Room	60

YEAR OF PURCHASE	YEAR PRES. TEST	SERIAL NO.	TYPE	SIZE	LOCATION	OUR NO.
1982		095259	ABC	10	North end, East wall, No. 1 Blanket Room	61
1972	1983	961602	ABC	20	Center East wall, No. 2 Blanket Room	62
1977	1983	406637	CO^2	5	North end, East wall, No. 2 Blanket Room	63
1977	1983	762254	CO^2	5	South end, East wall, No. 2 Blanket Room	64
1977	1983	DY742317	CO^2	10	Bottom of stairs to incinerator, Roof of White Room	65
1978		CR554430	ABC	10	Southeast wall, main office area	66
1978		CR554431	ABC	10	West wall, Center of mainf office area	67
1978		CR554424	ABC	10	Northeast wall, main office area	68
1964	1983	80761	ABC	10	Aisle to dispensory, South wall	69
1964	1983	80510	ABC	10	East wall, near pre-inspect, Litho-inspect room	70
1981		310137	ABC	10	1st aisle, on pole, near Litho-inspect	71
1981		318334	ABC	10	2nd aisle, on pole, South side of Litho-inspect	72
1981		DW318325	ABC	10	3rd aisle, on pole, North side of Litho-inspect	73
1977	1983	D440069	ABC	10	Near incinerator on roof, White Room	74
1977	1983	687104	CO^2	5	Northeast wall, near floor scale in Shipping & Receiving	75
1967	1983	J56290	ABC	10	Center aisle, West end Litho-inspect 1st column	76
1977	1983	J165876	CO^2	15	4th aisle, North wall, 3rd column, Litho-inspect	77
1977	1983	700442	CO^2	15	Center aisle, West end Litho-inspect	78
1973	1983	AX314708	ABC	20	West end, North wall, Litho-inpsect	79
1979		CZ316656	ABC	20	West end, South wall, Litho-inspect near Rest Room	80
1967	1983	356136	ABC	10	North wall, in Lab, near door	81
1977	1983	581901	CO^2	5	Under Greenerd stand, center of Lab	82
1979		CZ316680	ABC	20	Southeast wall, near exit, new storage area	83
1979		CZ306646	ABC	20	Southwest wall, near exit, new storage area	84
1979		CZ316685	ABC	20	West wall, North corner, new storage area	85
	1983	156	HALON	10	In Computer Room	86
1977	1983	H727400	CO^2	10	South wall, boiler room	87
						88
1982		EF456097	ABC	20	Southeast wall, C.B.A. room	89
1982		EF464419	ABC	20	South wall, lower F.I.A. Room	90

YEAR OF PURCHASE	YEAR PRES. TEST	SERIAL NO.	TYPE	SIZE	LOCATION	OUR NO.
1980		DP778511	ABC	2-3/4	Diesel Lift Truck	1X
1973	1983	AM103124	ABC	150	Wheeled Unit, Spreader Room Area	2X
1969	1983	AR905325	ABC	150	Wheeled Unit, South end No. 1 Track & Trim	3X
1973	1983	AY496458	ABC	2-3/4	Floor Sweeper	4X
1979		CZ783319	ABC	5	Old Gas Lift Truck	5X
1983		DS258416	ABC	5	New Gas Lift Truck	6X
EXTRAS						
1977	1983	E687112	CO^2	5		
1981		DS258416	ABC	5		
1977	1983	i 143853	CO^2	10		
1977	1973	T370045	ABC	20		
	1983	E156	HALON	10		
	1983	E156	HALON	10		
1978	1983	CX549820	ABC	20		