



Superfund  
SITE: SPSNE  
BREAK: 11.9  
OTHER: 448176

Lilly Industries, Inc.



SDMS DocID

448176

December 17, 1992

Ms. Marilyn K. Goldberg  
U.S.E.P.A.  
P.O. Box 221470  
Chantilly, VA 22022

Re: Solvent Recovery Service of New England Superfund Site  
Response to 104(e) request dated 12-7-92

Dear Ms. Goldberg:

Attached to this letter you will find the response of Lilly Industries, Inc. (Lilly) to U.S.E.P.A.'s latest Section 104(e) request for the above referenced site. Lilly is the successor to Lilly Industrial Coatings, Inc. and Lilly Chemical Products, Inc.

Lilly's response includes several items which require explanation. First, Lilly's records for these transactions either do not exist, or do not specifically identify the waste. To the best of Lilly's knowledge, all wastes sent to SRSNE for reclamation would have resulted from the routine cleaning of mix tanks with a solvent blend and could have included an occasional drum of off specification product. These materials would have contained basically the same constituents. The primary constituents would have been toluene and xylene with lower concentrations of other non-halogenated solvents. To the best of Lilly's knowledge, no chlorinated solvents were used by Lilly.

Second, Lilly has only limited documentation of transporter information. The data available shows that either Lilly trucks transported the waste to SRSNE for reclamation and picked up reclaimed material; or that SRSNE delivered reclaimed material to Lilly and picked-up waste for reclamation. Lilly employees are unaware that any other transporter was ever used to transport Lilly waste. The "roundtrip" procedure is logical and Lilly believes that it must have been used during the entire period that Lilly did business with SRSNE.

Third, Lilly has no records or recollection as to who selected the SRSNE site for Lilly waste. The only individual who may have known is deceased. Lilly assumes that a Lilly employee made the decision.

Finally, Lilly has included copies of several documents which may apply to the entry for 12-24-80.

A factory order lists a shipment of 84 drums (4,620 gallons) shipped to SRSNE on 8-21-80 which appears to have been processed and returned to Lilly on 12-24-80 (see SRSNE invoice dated 12-31-80). Lilly has also submitted manifest # MA0003858 dated 12-24-80 for 4,620 gallons which appears to have been processed and returned to Lilly on 2-23-81 (see SRSNE invoice dated 2-25-81). It is unclear which of these shipments is reflected on the USEPA Form 1. (The factory order dated 8-21-80 and SRSNE invoice dated 12-31-80 were submitted as part of Lilly's previous 104(e) submittal).

If you have any questions regarding this information, please contact me at (317) 687-6722.

Sincerely,



Christa O. Russell  
Manager Environmental Affairs

a:129215.cr

Enclosure

**ENCLOSURE B**

**Solvents Recovery Service of New England  
104(e) Information Request Form for Generators**

1. Name of Respondent: Lilly Industries, Inc.
2. Date Information Request Completed: 12-17-92
3. For each transaction listed on Form 1 (attached), identify by chemical name the type of waste material that the Respondent sent for treatment or disposal to the Site or sent with a transporter for treatment or disposal to the Site. If the chemical name is not known, please state the trade name and the name of the manufacturer. Also identify the transporter of each waste volume and identify who made the decision to bring the waste to the Site -- the transporter, generator, or broker. Attach copies of all documents consulted, examined, or referred to in the preparation of answers to these questions.
4. At the end of Form 1 and consistent with the format of Form 1, identify and provide complete information on any additional transactions which do not appear on Form 1 or transactions which are in some manner incorrectly recorded on Form 1. Attach copies of all documents which provide information on these transactions.
5. If you are not the generator of any of the wastes attributed to you in the listing of transactions on Form 1 (i.e., you sent waste materials to the Site for disposal or treatment that were generated by a person other than you), please complete steps a through d below:
  - a) Provide the information requested for that transaction on Form 1;
  - b) Highlight the transaction by placing an asterisk (\*) to the left of the appropriate transaction date on Form 1; and
  - c) Provide the information requested on Form 2 (attached);
  - d) Attach copies of all documents consulted, examined, or referred in to the preparation of answers to these questions.
6. Please identify all persons consulted in the preparation of the answers to these questions. Indicate their relationship to the Respondent (e.g., current employee - environmental manager, past employee - maintenance department, etc.). Attach extra pages if necessary.

## 6. (continued)

Name: Christa O. Russell  
Address 733 S. West Street  
Indianapolis, IN 46225  
Phone No. 317-687-6722  
Relation to Respondent Environmental Manager

Name: Alan E. Kisiel  
Address: P.O. Box 188, Athol Road  
Templeton, MA 01468  
Phone No. 508-939-2166  
Relation to Respondent Operations Manager  
Lilly-Templeton

Name: Tom Kelley  
Address: 20 Comee Street  
Gardner, MA 01440  
Phone No. 508-632-3174  
Relation to Respondent: Former General Manager

Name: Ray Ouellette  
Address: 263 Park Street  
Gardner, MA 01440  
Phone No. 508-632-3482  
Relation to Respondent: Formerly in charge of  
Shipping/Receiving

7. Please identify the person(s) completing this questionnaire and identify the relationship to the Respondent. Attach extra pages if necessary.

Name: Christa O. Russell

Address: 733 S. West Street

Indianapolis, IN 46225

Phone No. 317-687-6722

Relation to Respondent: Environmental Manager

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone No. \_\_\_\_\_

Relation to Respondent: \_\_\_\_\_

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone No. \_\_\_\_\_

Relation to Respondent: \_\_\_\_\_

**Solvents Recovery Service of New England  
Lilly Chemical Prod. (Templeton, MA)**

<b>Transaction Date (1)</b>	<b>Gallon Volume (2)</b>	<b>Waste Type (3)</b>	<b>Name/Address of Transporter</b>	<b>Name/Description of Who Selected the Site (4)</b>
01/18/67	1,320.00	*	Unknown **	Unknown ***
06/08/67	1,760.00	*	Unknown **	Unknown ***
09/18/68	1,045.00	*	Unknown **	Unknown ***
03/25/69	1,485.00	*	Unknown **	Unknown ***
12/24/80	4,620.00	*	Unknown **	Unknown ***

\* There are no written records available, however, the wastes generated by Lilly's MA facilities results from solvent washing of mix vessels and occasionally included off-spec products. Primary constituents are Xylene, Toluene and other non-halogenated hydrocarbons. No halogenated solvents were used at this facility.

\*\* Few records exists which designate Lilly's waste transporter. However, those which do exist indicate that either Lilly or SRSNE trucks were used. Lilly is unaware of the use of any other transporter.

\*\*\* There are no records to indicate who selected the Site; it is assumed to have been Lilly employees.

**Notes:**

(1) The transaction date refers to the date the waste was delivered to SRSNE. This date may differ from the date the waste left the generator's facility, (particularly if the transaction was brokered by another party), and therefore may not match exactly with your records. EPA expects you to make your best efforts to correlate your records with EPA's documents. This is to prevent double-counting of shipments in EPA's volumetric ranking.

(2) All gallon volumes are waste-in transactions to SRSNE.

(3) Please state waste type by chemical name. If the chemical name is not known, please state the trade name and the manufacturer's name.

(4) e.g., XYZ Chemical Company - generator; ABC Waste Trucking - transporter; EFG Waste Disposal Service - broker.

**Page:** \_\_\_\_\_

[illegible]

CUSTOM DISTILLATIONS  
FOR INDUSTRY
**SOLVENTS RECOVERY SERVICE  
OF NEW ENGLAND, INC.**

LAZY LANE • SOUTHTON, CONN. 06489 PHONE 203-628-8084

SOLD TO

SHIP TO

1880

Lilly Chemical Products  
Athol Road  
Templeton, Ma. 01468

DATE SHIPPED	VIA	PREPAID	COLLECT	INVOICE DATE	OUR ORDER NO.	YOUR ORDER NO.
2/23/81	SRSNE	X		2/25/81	0649/22	
QUANTITY	DESCRIPTION			UNIT PRICE	AMOUNT	
3590 gals.	GALS OR LBS Thinner (68 drums)			1.04	\$ 3733.60	
610	GALS BY PRODUCT			.27	164.70	
4200	GALS OR LBS CRUDE PROCESSED					
85	% YIELD					
56	DRUMS <del>RECONDITIONED</del> non-reconditioned 54 #2 @ 25.00			60.00	3360.00	
	DRUMS FURNISHED 2 #3 @ 80.00				150.00	
	DRUMS SCRAPPED					
	TRANSPORTATION					
	single S/T charge on 0464 should be R/T (12/24) difference is				160.00	
	R/T 2/23/81 82-P/U 68 del.				495.00	
					7913.30	
					6063.30	
OUR TERMS ARE NET 15 DAYS						

OUR TERMS ARE NET 15 DAYS



## HAZARDOUS WASTE MANIFEST AND SHIPPING PAPER

MA 0003858

MANIFEST NUMBER

GENERATOR NAME	MAILING ADDRESS	PHONE NUMBER	STATE/EPA ID NO
Lilly Industrial Coatings Inc.	Athol Rd. Templeton MA 01468	(617) 939-2166	MA 0001440155
PRIMARY TRANSPORTER Solvents Recovery Service of New England, Inc.	Lazy Lane Southington CT 06489	(203) 628-8084	CT 0009717604
CONTINUING TRANSPORTER			
H.W.F. Solvents Recovery Service of New England, Inc.	Lazy Lane Southington CT 06489	(203) 628-8084	CT 0009717604
IF MORE THAN ONE MANIFEST/ SHIPPING PAPER IS USED:	TOTAL NO. OF FORMS ARE	THIS FORM NO IS	MANIFEST NO OF FIRST FORM
DATE SHIPPED	MONTH	DAY	YEAR
	12	24	80
EXPECTED ARRIVAL	MONTH	DAY	YEAR
DATE	12	24	80

GENERATOR COMPLETES

U.S. DOT. SHIPPING NAME	DOT. HAZARD CLASS	UN / NA NO.	WT / VOL	UNITS	UNIT CODE	CONTAINER NO	TYPE	EPA WASTE NO	DESCRIPTION OR WASTE ANALYSIS IF WASTE IS N.O.S.
Waste Compound, Paint Thinning Liquid	Flammable	NA1142	4620	gal.	6	84	DR	K075	
2									
3									
4									
5									
6									

SPECIAL HANDLING INSTRUCTIONS INCLUDING ANY CONTAINER EXCEPTION, AND EMERGENCY RESPONSE INFORMATION:

IN THE EVENT OF A SPILL, CONTACT THE NATIONAL RESPONSE CENTER, U.S. COAST GUARD 1-800-424-8602

TRANSPORTER COMPLETES

REQUIRED LABELS <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	THIS IS TO CERTIFY THAT I AM THE PRIMARY TRANSPORTER AND HAVE ACCEPTED THE DESCRIBED SHIPMENT IN PROPER CONDITION FOR TRANSPORT TO THE IDENTIFIED H.W.F. <i>[Signature]</i> SIGNATURE OF TRANSPORTER	DATE SHIPMENT ACCEPTED MONTH DAY YEAR 12 24 80	STATE VEHICLE I.D. CT 009	COMPANY NO. FOR TRAILER, MARINE OR RAIL	DATE OF DELIVERY MONTH DAY 12 24
PLACARDS REQUIRED	THIS IS TO CERTIFY THAT I AM THE CONTINUING TRANSPORTER AND HAVE ACCEPTED THE DESCRIBED SHIPMENT IN PROPER CONDITION FOR TRANSPORT TO THE IDENTIFIED H.W.F. SIGNATURE OF TRANSPORTER	DATE SHIPMENT ACCEPTED MONTH DAY YEAR	STATE VEHICLE I.D.	COMPANY NO. FOR TRAILER, MARINE OR RAIL	DATE OF DELIVERY MONTH DAY

H.W.F. COMPLETES

INDICATE ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT AND LIST REJECTED MATERIALS, INDICATE DISPOSITION OF REJECTED SHIPMENT

I CERTIFY THAT THE DESCRIBED WASTE(S) WAS DELIVERED BY THE AFOREMENTIONED DELIVERING TRANSPORTER AND THAT THE INFORMATION ON THIS

MANIFEST IS CORRECT TO THE BEST OF MY KNOWLEDGE

12 24 80

HANDLING METHOD

1	2	3	4	5	6

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 AND THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

*[Signature]*  
GENERATOR SIGNATURE

DATE 12 24 80  
GENERATOR'S EMERGENCY PHONE

# FACTORY ORDER

19716

DATE 8/4/80	SALESMAN	CUSTOMER'S ORDER NO	MARK PACKAGES
----------------	----------	---------------------	---------------

NAME Solvents Recovery Service of New England  
 Lazy ~~Ree~~ Lane  
 Southington, CT

MADE BY \_\_\_\_\_

FILLED BY \_\_\_\_\_

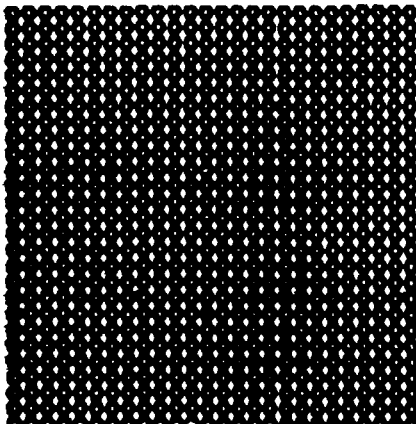
CHECKED BY \_\_\_\_\_

SHIP TO

PROD NO. \_\_\_\_\_

SHIP. WGT. 38,640

WHEN SHIP Week of 8/4/80		VIA Their Truck							DATE SHIPPED 8-24-80
CONTAINERS USED	HG DRUMS	LG DRUMS	C DRUMS	LL DRUMS	OH DRUMS	RD PAILS	SG CANS	OTHER	

S	BO	QUANTITY		C NO.	DESCRIPTION	GALLONS	RATE	AMOUNT	FORMULA
		NO	PKG						
84		84	Drums		Solvent for Reclaim				LDC MC
									

LILLY CHEMICAL PRODUCTS, INC.

ATHOL ROAD • TEMPLETON, MASSACHUSETTS 01468

OFFICE COPY

CUSTOM DISTILLATIONS  
FOR INDUSTRY

# **SOLVENTS RECOVERY SERVICE OF NEW ENGLAND, INC.**

LAZY LANE • SOUTHTON, CONN. 06489 PHONE 203-628-8084

Company

Date

SOLD TO

SHIP TO

1880

Lilly Chemical Products  
Athol Road  
Templeton, MA 01468

DATE SHIPPED	VIA	PREPAID	COLLECT	INVOICE DATE	OUR ORDER NO.	YOUR ORDER NO.
12/24/80				12/31/80	0464/22	2747
QUANTITY	DESCRIPTION			UNIT PRICE	AMOUNT	
3122	GALS. THINER			71/gal.	221.82	
3122	GALS. BY PRODUCT			23/gal.	71.81	
3122	DRUMS RECONDITIONED Lined			11.75/dr.	311.00	
30	DRUMS RECONDITIONED 42's			25.00/dr.	750.00	
2	DRUMS RECONDITIONED 43's			80.00/dr.	160.00	
7	EXCESSIVE - furnished - Lined Drums			14.75/dr.	103.25	
Del. 12/24 (59 drums)					250.00	
					4348.61	
SOLVENTS ARE						

OUR TERMS ARE NET 15 DAYS

TERMS: 1% 10 DAYS - NET 30 DAYS

SOLVENTS, INC.

100 DE NEW ENGLAND, CONN.