coral
international inc
135 LeBaron Street • Waukegan, IL 60085 • (708) 336-8100

December 8, 1994

Mr. Richard Boice HSRL-6J
Office of Superfund
U.S. EPA - Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Re: Second Request for Information Pursuant to Section 104(e) of the CERCLA and Section 3007 of RCRA

Dear Mr. Boice:

Coral International, Inc. ("Coral") submits the following information in response to your second request for information dated October 28, 1994. The time for submitting this information was extended to December 12, 1994 by your telephone conversation with David Muschler, our attorney, on December 5, 1994.

This second request references a Coral facility located at 1535 Morrow Avenue, Waukegan, Illinois. Coral utilized an office for sales purposes only, located at 1535 Morrow Avenue, North Chicago, Illinois. This was prior to or during the very early part of the period that the Site was operated as a landfill from 1959 through 1969 (the "Relevant Period"). That location was solely operated as an office and no manufacturing occurred there.

At page 4 of the Second Request, it is indicated that Coral failed to supplement its prior response as a result of information disclosing that Waukegan Disposal disposed of waste at the Site. Coral's response of September 7, 1989 at paragraph 1 indicated that Browning Ferris Industries ("BFI") removed materials from its premises and that this included its predecessor known as Waukegan Disposal. Coral at no time had any knowledge as to where Waukegan Disposal disposed of any waste that may have been picked up from Coral. To date, Coral would be unable to state where Waukegan Disposal disposed of any waste.

In responding to the specific questions raised in the Second Request, Coral makes this response as it pertains to its facility at 135 Le Baron Street, Waukegan, Illinois. Coral has no independent knowledge with regard to any waste disposal practices from the Morrow Avenue, North Chicago location, other than the fact that the location was utilized for sales purposes only and no manufacturing took place there. Coral responds to the specific questions as follows:

1. Provide a description of the facility operations, including:
   a) type of work performed;
   b) manufacturing processes;
   c) materials used;
   d) wastes generated, including residual powders disposed of along with empty bags and drums, liquids, and any wastes disposed of in drums.
   e) waste disposal practices;
   f) the time period over which the facility operated

RESPONSE:

a) Coral's business is the mixing and combination of chemicals and other materials pursuant to specification to produce a product for a particular use by a particular customer. Ideally, that process produces no waste.

b) From approximately 1963, production equipment consisted of one 70 foot cubic paddle blender and a fork lift. A paddle blender is a large trough with a shaft running through the center of the trough for the entire length. Arms are affixed to the shaft that act as paddles when the shaft is rotated. The blender is capable of mixing solid, free-flowing materials (i.e., salt, sand) and cannot mix any pure liquid materials (i.e., vinegar, oil, water).

Beginning some time in 1965, a separate area was established for blending liquid products. Approximately 3 blending tanks were installed. Each tank was equipped with an agitator to effect the blending. The tanks ranged in size from about 165 gallons to 1,150 gallons. Material flow was virtually identical to that described for powdered products except that raw materials were usually received in 55 gallon drums. Liquid production can be compared to making a pitcher of Bloody Marys. Ingredients are added to the blending tank in order, the tank is stirred, and the resulting blended product is packaged for shipment and consumption, mostly in 55 gallon drums, although some smaller packaging was also provided.

c) Attached hereto as an exhibit is a raw material list for the year 1967. This was derived by a review of individual batch cards for the year 1967. We estimate that there are approximately 24,000 hand written production cards for the period 1963 through 1969. The raw materials for the years of the Relevant Period that Coral utilized an outside waste hauler would not have differed significantly from the raw materials used in 1967.

d) Broken & Un-reuseable Pallets
Cardboard Slip Sheets
Miscellaneous Used Packaging Materials
Strapping, Metal and Plastic
Food Scraps from Lunch
Coffee Grounds
Paper, Newspaper & Cardboard
Steel & Aluminum Beverage Containers
Broken or Wornout Equipment
Used Floor Sweeping Compound
Dust Collector Wastes
Used Laboratory Experiment Metal Parts
Used Laboratory Experiment Chemicals
Q.C. Retain Samples
Production Over-Runs
Raw Material Spills
Production Rejects
Obsolete Raw Materials
Empty Containers With or Without Chemical Residue
Glass & Plastic Bottles, 2 oz - 1 gal
Plastic Pails, 5 gal
Fiber Kegs & Drums, 7-61 gal
Steel & Plastic Drums, 15-55 gal
Paper & Plastic Bags, 0.8-1.8 cubic foot

e) Until mid-1965, all waste was disposed at the Le Baron facility either by burning or disposal through the municipal sewer system. Commencing in mid-1965, Coral utilized Waukegan Disposal to haul certain of its waste off-site while, at the same time, continuing its disposal by burning and through the municipal sewer system.

f) Coral purchased the facility in 1961 and took occupancy after some construction in mid or late 1961. Until approximately November 1962, no manufacturing took place at the facility as it was only utilized for sales purposes. Commencing in approximately November 1962 some pilot blending of powders commenced at the facility. That blending continued until approximately 1965 when liquid blending commenced and continued through 1969.

2. Transporters to the Yeoman Creek Landfill have included: Waukegan Disposal, National Disposal Corporation, A&A Disposal, Barrington Trucking, Dotton and Larson, Delta Disposal, Peter Faargard, Little Disposal, Fred Noorlag, Sisson Disposal, Jensen Disposal, Obenauf Disposal and T-K City Disposal. Since we have depositions that state that wastes from Coral Chemical Company were picked up by Waukegan Disposal, and disposed of in the Yeoman Creek Landfill Site during the relevant time period, please respond to the following:

a) Provide copies of all shipping documents, or other business documents including receipts, relating to the transportation, storage and/or disposal by Waukegan Disposal, the other transportation/disposal companies listed above, or by any other transportation/disposal company that utilized the Site.

b) Provide the generic, common or trade name and the chemical composition and character (i.e. liquids, solid, sludge) of the materials transported to, stored and/or disposed by Waukegan Disposal, the other transportation/disposal companies listed above, or by any other transportation/disposal company that utilized the Site, including residual powders disposed within empty bags and drums, liquids, and any wastes disposed of in drums.

c) For each waste material identified above, please give the total volume in gallons for liquids, in cubic yards for solids, for which you have arranged disposal.

d) State the amount paid in connection with each transaction, the method of payment, and the identity of the person from whom payment was received.

e) Provide copies of all records, including analytical results, and material safety sheets, which indicate the chemical composition and/or chemical character of the waste material(s) transported, or disposed by Waukegan Disposal, by the other transportation/disposal companies listed above, or by any other transportation/disposal company that utilized the Site.

RESPONSE:

a) No such documents available.

b) Coral has no additional information with regard to the materials disposed through Waukegan Disposal other than that set forth in response to question 1(d) above.

c) Coral has estimated that its general plant trash was 1 cubic yard per day in 1965, 2 cubic yards per day in 1966, 3 cubic yards per day in 1967 and 1968 and 4 cubic yards per day in 1969. Of that total waste disposed off-site, it estimates that it disposed of 4.9 to 5.5 cubic yards of chemical waste per year.

d) Coral made regular payments to Waukegan Disposal for the services rendered during the period 1965 through 1969 but has no records as to the amount paid to Waukegan Disposal for those services.

e) No such records available.

3. [There was no questions 3]

4. Identify all persons consulted in the preparation of the answers to these Information Requests.

RESPONSE:

John Schueneman, President of Coral International.

5. Identify all documents consulted, examined, or referral (sic) to in the preparation of the answers to these Requests and provide copies of all such documents.

RESPONSE:

The only documents which Coral has from this period are approximately 24,000 hand written production cards showing the chemical composition of each order received from November 1962 through 1969. The information contained in these records is confidential and any review of this information would be subject to the confidentiality provisions of 40 CFR 2.201. The basis of this claim of confidentiality is that the production records identify the customer, the product and the compositions of each product from November 1962 through 1969.

The undersigned certifies that all the information contained herein is true and accurate to the best of his knowledge and belief and that he has made a diligent search for all documents responsive to this request.

John E. Schueneman, President
Coral International, Inc.

SUBSCRIBED AND SWORN TO before me by JOHN E. SCHUENEMAN this 8 day of DEC, 1994.

"OFFICIAL SEAL"
Dennis D. Pearson
Notary Public, State of Illinois
My Commission Expires 2/4/98

Notary Public

cii-13/dem/sh

1967 RAW MATERIAL LIST

Acryloid B-67	
Actrasol C-75	
Activating Compound 913	
Aerosol OS	
Aerosol OT-75	
Alizarine Violet dye	
Alipal CO-436	
Alketerg T	
Alox 318	
Alox 575	
Alox 1727	
Alox 2026	
aluminum chips	
aluminum oxide	
Amine R	
Amity 1200	
ammonia, 26 Be	
ammonium bicarbonate	
ammonium bifluoride	
ammonium thiocyanate	
Antara LF 205	Rust Preventive
Antara LM 400	
Antifoam AF	
anthroquinone	
Armohib 25	
Armohib 28	
Armohib 31	
Armour 524	soap
Armour 92% soap	
ASP-100 clay	
Azo Ruben red dye	
Benax 2A-1, liquid	(346-15)
Benax 2A-1, powder	
Bentonite 325	
bicarbonate	
Biosoft D-60	
Blend 10326 solvent	
Borax 30/100	
Borax 40/200	
Borax Tech, extra coarse	
BTC 824	
BTC 2125	
Butyl Cellosolve	
calcium chloride	
calcium nitrate	
caramel color	
Carbium	fire retardant
Carbose	
caustic potash	
caustic soda	
Century Oil, 150	RP
CDB 63	
Cerelose Dextrose	
CPH 212	

chloroacetic acid	
Chloro-San	
chromic acid	
citric acid	
cobalt sulfate	
Colorome A	
Compound C	
Compound D	
Compound L	
Comsolv #6	
corn meal	
Cresol #4	
cresylic acid	
Daisy powder	
Deriphot 154	
DDT	
deodorized kerosene	
Desowet T	
Dextrin 9084	
dimethyl acid pyrophosphate	
disodium phosphate	
Dresinate TX	
Dresinate X	
Dresinate XX	
Duomeen C	
EDTA	
Emersol 213	
Epsom salts	
Ethomeen C/25	
ethylene dichloride	
Fastusol Blue dye	
ferric chloride	
Flozan	soda ash
fluoboric acid	
formaldehyde	
formic acid	
Gafac RE 610	
gluconic acid	
Haag 50% Lube Soap	
Halane	fire retardant
hexylene glycol	
Hyamine 1622	
Hycryl A-1000	
hydrated lime	
hydrochloric acid, 22 BE	
hydrofluoric acid	
hydrofluosilicic acid	
hydrogen peroxide	
hydroxyacetic acid	
isopropyl alcohol, 99%	
Kasil #6	
Kaysoy 200C	protein
KC 36 talc	
kerosene	
lactic acid	
Latol 28	

Leeben Pink dye	
Lytron 602	polystyrene emulsi
manganese carbonate	
Maracell E	
Marasperse N	
Metanil yellow dye	
methanol	
Methocell 8000	
methylene chloride	
methyl salicylate	
methyl orange	
Metso 60	
Metso 200	
mineral seal oil	
Miranol J2M	
Mirol 1281	
Mobil Flourex 200	mineral oil
monoammonium phosphate	
monocalcium phosphate	
monoethanolamine	
monosodium phosphate	
Morpholine	
Nacan	
Nacconal 40 DBX	
Naccosol A	
naphthol green dye	
Neutroleum Alpha	
Neutronix 626	
nickel carbonate	
nickel sulfate	
Ninol 1281	
nitric acid	
Nopco 1619B	surfactant
Nopco KFH (defoamer)	
Nopco NDW	
Oiate flakes	
Onyx 336	
Opal Bouquet Toilet Soap, 15%	
orange blossom perfume	
orthodichlorobenzene	
Orvus AB	surfactant
paraffin wax	
Perk	F1060
Petro AA	
Petromix 9	
Petronate CR	
phosphoric acid	
pine oil	
Pittchlor (powder)	
Pluronic L-61	
Pluronic L-62	
Polyrad 1110	
Polyterg J-400	
potassium ferrocyanide	
propylene glycol	
Pumice N-908-1	

Quadrol
Reilly #22
Reliance 370-64 (booth coat)
Rodine 82A
Rodine 115
salt, general purpose
Santosite — sodium sulfite
SC Solvent 450
silica flour
silica sand, white
soda ash, dense
soda ash, light
sodium acid pyrophosphate
sodium bichromate
sodium bisulfate
sodium chlorite
sodium chlorate
sodium chromate
sodium fluoride
sodium gluconate
sodium hydroxide
sodium lauryl sulfate
sodium metaborate
sodium metanitrobenzene sulfonate
sodium metasilicate
sodium molybdate
sodium nitrate
sodium nitrite
sodium silicate
sodium silicofluoride
sodium sulfate
sodium thiosulfate
sodium tripolyphosphate
Solvent 598
Star Oil 67
Star PF-63
Sterox CD — surfactant
stock color #1
sulfamic acid
Sulframin 45S
Sulframin 1298
Sulframin 4010
sulfuric acid
Super Amide GR
Super Resin — 560-3
Surco 60-S
Surfactant DF12
Swift 5589 soap
talc
Tamol SN
Tergitol 08
tetrahydrofurfuryl alcohol
Tetranol 3
tetrapotassium pyrophosphate
tetrasodium phosphate
tetrasodium phosphate, chlorinated

tetrasodium pyrophosphate
Texas Pale Oil, 200
tricalcium phosphate
triethane
trichloroethylene
triethanolamine
tripolyphosphate
trisodium phosphate
Triton B1956
Triton CF-10
Triton CF-32
Triton QS-30
Triton X-100
Triton X-102
Triton X-114
Triton X-155
Troykyd 333
Tween 85
uranine dye
Tymet 100 chelator
urea
Veesonal 120
Victolite
Vitrophos
wood flour
Xylol
Yellow Protopet
zinc chloride
zinc nitrate
zinc oxide
zinc stearate

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