

10/16 4030

PIRELLI ARMSTRONG TIRE CORPORATION

Superfund Records Center

SITE: SRSNE

BREAK: 119

NO. 445591

Sherwood S. Willard
General Counsel
and Corporate Secretary



SDMS DocID 445591

November 25, 1992

Marilyn K. Goldberg
U.S. Environmental Protection Agency
P.O. Box 221470
Chantilly, VA 22022

RE: Request for Information for Solvents Recovery Service of New England (SRSNE) Superfund Site in Southington, Connecticut

Dear Ms. Goldberg:

Enclosed is the information requested in the November 3, 1992 letter from Merrill S. Hohman, Director Waste Management Division of Region I, USEPA relating to the above referenced matter. Please note that we have not been able to locate any files that provide information with respect to the use of this site by The Armstrong Rubber Company. The transactions listed on Form I are those indicated by EPA in the information supplied to Pirelli Armstrong and have not been independently verified. The only additional information we are adding is the name of the shipper which was recalled by a former employee and our best estimate of the contents of the material based on a knowledge of the manufacturing process. We are continuing to look for records and if additional relevant information is found, it will be forwarded to your attention.

Based on the information available to date, it is the position of Pirelli Armstrong that its volume allocation should not change from the 6,710 gallons estimated by EPA.

Please do not hesitate to contact this office if further information is required.

Sincerely yours,

Sherwood S. Willard

Enclosures

ENCLOSURE B

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

1. Name of Respondent: Pirelli Armstrong Tire Corporation (Armstrong Rubber)
2. Date Information Request Completed: 11/25/92
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: Peter Provost
Address Pirelli Armstrong Tire Corporation
500 Sargent Drive, New Haven, CT 06536
Phone No. 203-784-2431
Relation to Respondent Environmental Coordinator

Name: Martin Hannon
Address: Pirelli Armstrong Tire Corporation
500 Sargent Drive, New Haven, CT 06536
Phone No. 203-784-2224
Relation to Respondent Research & Development

Name: Kim McAllister
Address: Pirelli Armstrong Tire Corporation
710 Myatt Drive, P.O. Box 359, Madison, TN 37116-0359
Phone No. 615-860-1290
Relation to Respondent: P E Manager

Name: Zolton Benyus
Address: 178 Highclear Drive
Stamford, CT
Phone No. 203-322-7970
Relation to Respondent: Former Employee

6. (continued)

Name: Frank Luysterborghs
Address 458 Welch's Point Road
Milford, CT 06460
Phone No. 203-874-8428
Relation to Respondent Former Employee

Name: _____
Address: _____

Phone No. _____
Relation to Respondent _____

Name: _____
Address: _____

Phone No. _____
Relation to Respondent: _____

Name: _____
Address: _____

Phone No. _____
Relation to Respondent: _____

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

Name: Sherwood S. Willard

Address: Pirelli Armstrong Tire Corporation

500 Sargent Drive, New Haven, CT 06536

Phone No. 203-784-2326

Relation to Respondent: General Counsel

Name: _____

Address: _____

Phone No. _____

Relation to Respondent: _____

Name: _____

Address: _____

Phone No. _____

Relation to Respondent: _____

**Solvents Recovery Service of New England
Armstrong Rubber Company**

Transaction Date (1)	Gallon Volume (2)	Waste Type (3)	Name/Address of Transporter	Name/Description of Who Selected the Site (4)
05/07/65	550.00	See Below	Zolo Brothers	Zolo Brothers
06/08/65	1,540.00			
09/30/65	1,540.00			
01/26/66	1,540.00			
07/25/66	1,540.00			

To the best of our knowledge and belief, waste material was most probably a mixture of waste cement, used solvent, and/or outside tire spray. The tire cement was a mixture of solvent and dissolved rubber. The solvent was probably a petroleum naphtha. The rubber cement would have been a mixture of the solvent and dissolved rubber.

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.

Solvents Recovery Service of New England
Armstrong Rubber Company

Transaction Date (1)	Gallon Volume (2)	Waste Type (3)	Name/Address of Transporter	Name/Description of Who Selected the Site (4)
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NO KNOWLEDGE OF ANY SHIPMENTS OTHER THAN THOSE IDENTIFIED BY EPA

