

5257
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233

SIDLEY & AUSTIN
A PARTNERSHIP INCLUDING PROFESSIONAL CORPORATIONS

CHICAGO
LOS ANGELES
WASHINGTON, D.C.

875 THIRD AVENUE
NEW YORK, NEW YORK 10022
TELEPHONE 212: 906-2000
TELEX 97-1696
FACSIMILE 212: 906-2021

LONDON
SINGAPORE

TOKYO

WRITER'S DIRECT NUMBER

125th
Anniversary
1866-1991

Superfund Records Center
SITE: SRSNE
BREAK: 11.9
OTHER: 448117

(212) 906-2323

December 22, 1992



SDMS DocID

448117

VIA EXPRESS MAIL

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

Re: SRSNE Site - Response of Borden, Inc. for Columbus
Coated Facility and Leominster Facility

Dear Ms. Goldberg:

Enclosed are Borden, Inc.'s responses to EPA's information requests for the Columbus Coated Massachusetts facility and the Leominster, Massachusetts facility. These responses are provided after a thorough search of all available records. They are submitted at this time pursuant to agreements with Lloyd Selbst, Esq. and our recent letter.

Please contact me if you have any questions or concerns regarding these responses.

Very truly yours,


Mark Rachlin

M3R/lis

cc: Lawrence Dieker, Esq.
Linda Fitzpatrick, Esq.

ENCLOSURE B

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

- Columbus Coated Fabrics, Borden Packaging and
Industrial Products, Division of Borden, Inc.
1. Name of Respondent: Columbus Coated Fabrics, Borden Packaging and
Industrial Products, Division of Borden, Inc.
 2. Date Information Request Completed: December 22, 1992
 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. (attached)

Mr. Richard Peters
Duracoat Corporation
350 North Diamond Street
Ravenna, Ohio 44266
(216) 296-9600
Relation to Respondent: Former Plant Manager, Columbus Coated Fabrics

Mr. William Ilg
(614) 864-6123
Relation to Respondent: Former Environmental Coordinator,
Columbus Coated Fabrics

Mr. Gary Shinnick
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43216
(614) 297-6149
Relation: Assistant Controller, Columbus Coated Fabrics

Mr. John H. Sykes
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43216
(614) 297-6043
Relation: Environmental Coordinator, Columbus Coated Fabrics

Mr. Grover Thomas
Columbus Coated Fabrics
1280 North Grant Avenue
Columbus, Ohio 43216
(614) 297-6097
Relation: Environmental Manager, Columbus Coated Fabrics

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

Name: Mark Rachlin

Address: Sidley & Austin

875 Third Avenue, New York, NY 10022

Phone No. (212) 906-2323

Relation to Respondent: Legal Counsel

Name: _____

Address: _____

Phone No. _____

Relation to Respondent: _____

Name: _____

Address: _____

Phone No. _____

Relation to Respondent: _____

**Solvents Recovery Service of New England
Columbus Coated**

Transaction Date (1)	Gallon Volume (2)	Waste Type (3)	Name/Address of Transporter	Name/Description of Who Selected the Site (4)
06/14/78	4,400.00	<p>Borden has no record of a transaction on this date and EPA has not provided any documents as to such alleged transaction. Borden does have a record of a financial transaction on 6-19-78 which is contained within Exhibit 2 as described below.</p> <p>Borden submits three documents which provide general references to SRSNE. Borden stresses that, aside from the shipping documents attached to Exhibit 1, none of the additional documents provide any specific indications of specific transactions involving shipments of materials to SRSNE.</p> <p>Exhibit 1 is an internal memo from R.A.Peters to D. Bulson regarding MEK recovery at Columbus, dated April 28, 1977. This memo was generated when CCF was again considering sending MEK generated in the North Andover facility to CCF Columbus, Ohio for recovery. The CCF Columbus facility had the capability to process MEK, and in fact, according to Mr. Peters, at various times during CCF North Andover's operation, MEK was sent to Columbus for recovery. The April 28, 1977 memo states that CCF was sending MEK for recovery an average of fifty-five (55) fifty (50) gallon drums per month of scrap solvent and ink. The memo does not specifically indicate the quantity of scrap solvent and/or ink sent to SRSNE.</p> <p>Exhibit 2 is a list containing all payments made by CCF North Andover to SRSNE. This document provides each cash amount paid to SRSNE (payments not involving SRSNE are redacted.) The document does not account for any volumes</p>		

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
Borden Inc. Chemical Div./Columbus Coated Fabrics

Transaction Date (1)	Gallon Volume (2)	Waste Type (3)	Name/Address of Transporter	Name/Description of Who Selected the Site (4)
07/14/78	3,630.00	These figures are based on EPA provided documents SRP030-1252 and 1253.		
07/14/78	660.00	Borden is unable to surface any additional information regarding these transactions other than what is provided in these two documents.		

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.



INTER-COMPANY AND OFFICE CORRESPONDENCE

TO: Doug Bulson

FROM: R. A. Peters

LOCATED AT:

SUBJECT: MEK RECOVERY AT COLUMBUS

DATE: April 28, 1977

Dept.
Branch
Division
Company

Per our telephone conversation, I have checked at North Andover to determine the amount of waste solvent and scrap ink that we are sending out for recovery. I checked over the past year and find the average to be fifty-five (55) fifty (50) gallon barrels of scrap solvent and scrap ink per month. The breakdown between scrap solvent and scrap ink is approximately thirty-two (32) barrels average scrap solvent and twenty-two (22) barrels scrap ink.

At present, we are sending our material to a recovery company in Connecticut. They charge us as follows:

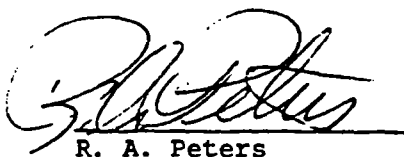
- 1) MEK reclaimed - .35¢/gallon.
- 2) For disposal of sludge - .11¢/gallon.
- 3) Average percent yield of MEK - 55%.

In addition, we are charged \$255.00 for transportation of eighty (80) barrels of scrap from North Andover to Connecticut and \$255.00 per tank truck of recovered solvent from Connecticut to North Andover.

The present recovery company will pick up no less than eighty (80) drums of scrap material and only returns recovered MEK by the tank truck, which would average 6500 gallons. Also, the material which we receive is evaluated both by the Columbus and North Andover Laboratory for quality and is used as virgin MEK.

I am attaching a current billing from the company we use in Connecticut which will give you an overall concept of the cost of material returned to us.

If you have any further questions, do not hesitate to ask.



R. A. Peters

RAP:fhf

Attachment



BORDEN INC
CHEMICAL DIVIS

ORIGIANATORS COPY

/ COLUMBUS COATED

3RICS

ORDER

1280 NORTH GRANT AVENUE / COLUMBUS, OHIO 43216

Telephone: (614) 225-6174 / Telex: 246-670

NO. 29616

IMPORTANT - SEE REVERSE SIDE FOR ADDITIONAL TERMS AND CONDITIONS WHICH ARE PART OF THIS PURCHASE ORDER.

THIS ORDER NUMBER MUST APPEAR ON ALL INVOICES, B/L'S PACKING CASES, BUNDLES, DRUMS, PACKING SLIPS AND CORRESPONDENCE.

TO

Solvents Recovery Service of W.E. Inc.
Lary Lane
Southington, Ct. 06489

S
H
I
P
T
O

1280 GRANT AVE. COLUMBUS, OHIO 43216
(UNLESS OTHERWISE SHOWN BELOW)

OLD CLARK ROAD
NO. ANDOVER, MASS. 01845

38083 CHERRS STREET
NEWARK, CALIFORNIA 94560

☐ TAXABLE

☒ NON-TAXABLE

REQUISITIONED BY: H. LELI

SHIP'S POINT		DESTINATION		FREIGHT		P.P. AND ALLOW'D		P.P. AND CHARGE		COLLECT		SHIP VIA		USED FOR	
ENDOR CODE		COMPANY CODE		LOCATION CODE		ORDER DATE		DEL'Y DATE		CHARGE DEPT.		TERMS OF PAYMENT		DELIVER TO	
						2/23/77				075-013		SRS		Reclaimed Solvent	
														North Andover	

ITEM QUANTITY ORDERED ITEM CODE NO. ← CODE NUMBERS MUST APPEAR ON ALL ROLLS AND CONTAINERS DESCRIPTION PRICE DIS-COUNT

			CONFIRMED and RECEIVED		
	5,450		Gallons MEK @ .34	\$1,853.00	
	4,585		Gallons sludge @ .11	504.35	
	3		Drums N.9 @ \$16/drum	30.00	
			Transportation: 9/24 (80 drums)	255.00	
			11/3 (80 drums)	255.00	
			12/3 (80 drums)	255.00	
			12/21 (80 drums)	255.00	
			Tr delivery 1/25		
				\$3,662.35	
			Total-----	\$3,662.35	
			SEND INVOICE TO:		
			COLUMBUS COATED FABRICS		
			OLD CLARK ROAD		
			NORTH ANDOVER, MASS. 01845		
			NO DELIVERIES AFTER 2 P.M.		
			EXCEPT ON REQUEST		
			ALL INVOICES MUST BE ACCOMPANIED BY BILL OF LADING		

NOTICE: YOUR ACKNOWLEDGEMENT OF THIS ORDER OR SHIPMENT OF GOODS OR FURNISHING OF SERVICES WILL CONSTITUTE AGREEMENT TO THE TERMS AND CONDITIONS OF THIS OFFER SET FORTH ON THIS SIDE AND ON THE REVERSE OF THIS PAGE. YOUR ACCEPTANCE IS EXPRESSLY LIMITED TO THOSE TERMS AND CONDITIONS. WHICH SUPERSEDE ALL OTHERS.

THE BORDEN CHEMICAL COMPANY
COLUMBUS COATED FABRICS DIVISION

AUTHORIZED SIGNATURE



CUSTOM DISTILLATIONS
FOR INDUSTRY

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

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

SOLD TO

Columbus Coated Fabrics
Division of Borden Company
Old Clark Rd.
No. Andover, MA 01845

SHIP TO

Same

RECEIVED

DATE SHIPPED	VIA	PREPAID	COLLECT	INVOICE DATE	OUR ORDER NO.	YOUR ORDER NO.
1/25/77	SRS	X		1/31/77	5401	
QUANTITY	DESCRIPTION			UNIT PRICE	AMOUNT	
5450	GALS OR LBS MEK			.34	\$ 1853.00	
4585	GALS SLUDGE			.11	504.35	
10035	GALS OR LBS CRUDE PROCESSED					
54	% YIELD					
3	DRUMS PROCESSED N.G.			10.00	30.00	
	DRUMS SCRAPPED					
	TRANSPORTATION Pickup 9/24 (80 Drums)				255.00	
	" 11/3 (80 Drums)				255.00	
	" 12/3 "				255.00	
	" 12/21 " "C.C.F. NO ANDOVER				255.00	
	TT Delivery 1/25				255.00	
	MGR.			DATE	3662.35	
	REQUESTER			DATE		
	188 Drums processed + 3 N.G. (38)					
	Weight Slip Enclosed			ACCOUNTING		

TERMS: 1% 10 DAYS - NET 30 DAYS

7344630 SOLVENTS RECOVERY SERVICE
LAZY LANE

SOUTHINGTON CT

06489

--- DOCUMENT ---	TERMS	DUE	PROF	BATCH		A M O U N T S				DRAFT DATA		
NUMBER	DATE	DAYS	DATE	CNTR	NUMB X	GROSS	DISCOUNT	DEDUCTION	NET	DATE	OUR NO	DRAFT NO
138732	11/12/75	001	11/13/75	026	159	1,387.32	13.87	.00	1,373.45	12/23/75	309765	575570
										PAID		OPEN
					VENDOR TOTALS	1,387.32	13.87	.00	1,373.45	1,373.45		.00

VENDOR - 007344530	SOLVENTS RECOVERY SERVICE	LAZY LANE	SOUTHINGTON CT	05493
00001792 6474	11-30-77 013951 05043 12-01-77 02-08-78	925 PD INV	2,470.05	2,470.05
		CHECK TOTALS	2,470.05	.00
00031478 632722	05-19-78 075511 06020 05-20-78 05-05-78	926 PD INV	3,721.25	3,721.25
		CHECK TOTALS	3,721.25	.00
00043159 7723922	05-27-78 099237 06104 06-28-78 07-25-78	925 PD INV	4,183.40	4,183.40
		CHECK TOTALS	4,183.40	.00
00073970 1242000	10-23-78 152848 05005 10-24-78 11-29-78	925 PD INV	420.00	420.00
		CHECK TOTALS	420.00	.00
50012035 508522	12-17-77 009879 01098 12-18-77 01-25-78	925 PD INV	4,075.53	4,075.53
		CHECK TOTALS	4,075.53	.00
		VENDOR TOTALS	14,870.24	.00

7344630 SOLVENTS RECOVERY SERVICE
LAZY LAKE

SOUTHINGTON CT

06489

-- DOCUMENT ---						A M O U N T S				----- DRAFT DATA -----		
NUMBER	DATE	TERMS DAYS	DUE DATE	PROF CNTR	BATCH T NMNR X	GROSS	DISCOUNT	DEDUCTION	NET	DATE	OUR NO	DRAFT NO
004014	12/31/75	001	01/01/76	026	128	2,362.60	23.63	.00	2,338.97	01/28/76	315392	582226
004465	04/30/76	001	05/01/76	026	151	3,485.60	34.86	.00	3,450.74	05/27/76	339034	20248
004886	10/31/76	001	11/01/76	026	029	2,360.00	23.60	.00	2,336.40	12/07/76	379695	65349
									PAID	OPEN		
VENDOR TOTALS						8,208.20	22.09	.00	8,126.11	8,126.11	.00	

7344630 SOLVENTS RECOVERY SERVICE

LAZY LANE

SOUTHINGTON CT

06489

-- DOCUMENT --						A M O U N T S				DRAFT DATA			
NUMBER	DATE	TERMS	DUE	PROF	BATCH								
		DAYS	DATE	CNTR	MMBR	X	GROSS	DISCOUNT	DEDUCTION	NET	DATE	OUR NO	DRAFT NO
005401	01/31/77	001	02/01/77	026	072		3,662.35	36.62	.00	3,625.73	03/15/77	400909	87029
005627	04/26/77	001	04/27/77	026	069		3,264.72	32.65	.00	3,232.07	06/14/77	420425	106961
											PAID	OPEN	
VENDOR TOTALS							6,927.07	69.27	.00	6,857.80	6,857.90	.00	

VENDOR - 007344630 SOLVENTS RECOVERY SERVICE

LAZY LANE

SOUTHINGTON CT

06489

00124202 745322A

03-14-79 257484 06022 03-15-79 05-04-79

926 PD INV

3,615.68

3,615.68

(DO NOT USE) (1-8)

CONFIDENTIAL

ATTORNEY WORK PAPERS
PREPARED FOR AND AT
THE REQUEST OF COUNSEL

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>10 | 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) | 1 | (47) |
| arsenic, selenium, antimony | 1 | (48) |
| mercury | 2 | (49) |
| iron, manganese, magnesium | 1 | (50) |
| zinc, cadmium, copper, chromium (trivalent) | 1 | (51) |
| chromium (hexavalent) | 1 | (52) |
| lead | 1 | (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 | 2 | (68) |
| PCB/PBB's | 2 | (69) |
| amides, amines, imides | 2 | (70) |
| plastizers | 2 | (71) |
| resins | 2 | (72) |
| elastomers | 2 | (73) |
| solvents polar (except water) | 2 | (74) |
| carbontetrachloride | 2 | (75) |
| trichloroethylene | 2 | (76) |
| other solvents nonpolar | 2 | (77) |
| solvents halogenated aliphatic | 2 | (78) |
| solvents halogenated aromatic | 2 | (79) |
| oils and oil sludges | 2 | (80) |
| esters and ethers | 2 | (81) |
| alcohols | 2 | (82) |
| ketones & aldehydes | 2 | (83) |
| dioxins | 2 | (84) |
| Inorganics | 2 | (85) |
| salts | 2 | (86) |
| mercaptans | 2 | (87) |
| Misc..... | 2 | (88) |
| pharmaceutical wastes | 2 | (89) |
| paints & pigments | 2 | (90) |
| catalysts (eg. vanadium, platinum, palladium) | 2 | (91) |
| asbestos | 2 | (92) |
| shock sensitive wastes (eg. nitrated toluenes) | 2 | (93) |
| air water reactive wastes (eg. P ₄ , aluminum chloride) | 2 | (94) |

PROVIDE A COMPLETE LIST OF ALL FIRMS AND INDEPENDENT CONTRACTORS, INCLUDING THE COMPANY AND ITS AFFILIATES AND SUBSIDIARIES, USED TO REMOVE PROCESS WASTES FROM THIS FACILITY SINCE 1950.

Company Name: Borden, Inc.Facility Name: Columbus Coated Fabrics - No. Andover

<u>Name of Firm or Contractor</u>	<u>Address</u>	<u>ICC # (If Known)</u>	<u>Years Used</u>
Solvent Recovery Service	Lazy Lane Southington, Conn.		1977-1978

CONFIDENTIALATTORNEY WORK PAPERS
PREPARED FOR AND AT
THE REQUEST OF COUNSEL

ENCLOSURE B

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

1. Name of Respondent: Borden, Inc. Leominster, Mass. Facility
2. Date Information Request Completed: December 22, 1992
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.
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Solvents Recovery Service of New England
Borden Chemical

Transaction Date (1)	Gallon Volume (2)	Waste Type (3)	Name/Address of Transporter	Name/Description of Who Selected the Site (4)
07/06/71	1,100.00	This alleged transaction implicates Borden's Leominster, Mass. facility. The Leominster facility shut down in 1984. All available documents relating to Leominster were reviewed. However, no documents were found which related to the SRSNE site. Additionally, Borden was unable to locate any person with knowledge of any relationship between the Leominster facility and SRSNE.		

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.
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- (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.